

Department of Transport,
Leeson Lane,
Dublin 2,
D02 TR60.

RE: Public Consultation on draft Renewable Transport Fuel Policy Statement 2025-2027

23rd May, 2025

To whom it concerns,

Cork Chamber welcomes the opportunity to contribute to the Public Consultation on draft Renewable Transport Fuel Policy Statement 2025-2027.

Cork Chamber represents 1,200 members together employing 130,000 people throughout the city, metropolitan area and county. Our vision is to lead a transforming and ambitious Cork City and County, and our purpose is to unite, represent and support our members and community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals. Cork Chamber has also been designated an SDG Champion by the Department of the Environment, Climate and Communications for 2024 – 2025.

Cork Chamber welcomes the ambition of the Draft Renewable Transport Fuel Policy and its alignment with Cork's capabilities in indigenous biofuels, green hydrogen production, and sustainable port development. Cork is uniquely positioned to contribute to Ireland's energy transition with a regional supply chain that supports climate targets and delivers local economic opportunity. We urge the Department to ensure that SMEs, regional producers, and innovation hubs in Cork are empowered through supportive renewable fuels of non-biological origin (RNFBFO) design, funding access, and representation in national working groups.

In addition, Cork Chamber supports the continued upward trajectory of the RTFO (Renewable Transport Fuel Obligation) to align with National and EU decarbonisation targets. The increasing RTFO targets represent a vital mechanism for delivering emissions reductions within the transport sector, in line with Ireland's Climate Action Plan and the EU's Renewable Energy Directive. This trajectory not only ensures progress towards the 2030 goals but also sends a strong policy signal that Ireland is committed to advancing a circular, low-carbon economy.

From a business perspective, it is important that the policy provides long-term clarity to support investment decisions, particularly for SMEs and logistics companies. The transition to renewable transport fuels will require significant private sector investment across supply chains, vehicle technologies, infrastructure, and training. Predictability and

transparency in the RTFO framework are essential to underpin confidence and de-risk investment decisions, particularly for SMEs. We recommend that accessible guidance, technical support, and financial instruments are in place to ensure SMEs can fully participate in this transition.

We also encourage support for renewable fuel supply chains, particularly emerging hydrogen initiatives locally, such as ESB's Hydrogen Production facility in Aghada, which present regional economic opportunities and contribute to national resilience. Cork has a strong and growing cluster of renewable energy activity, including hydrogen feasibility projects, green port infrastructure, and a skilled innovation ecosystem. Supporting the development of RFNBOs such as green hydrogen will be critical in meeting future RES-T targets and addressing sectors that are challenging to decarbonise. Projects like ESB's proposed green hydrogen development at Aghada should be recognised and supported as key strategic assets within the RTFO and wider hydrogen strategy.

The strategic importance of the offshore renewable sector and its potential development through access to sustainable fuels for maritime operations and logistics companies involved in offshore infrastructure cannot be understated. There is a clear opportunity to support the decarbonisation of port and maritime industry particularly in regions like Cork where Port of Cork plays a central role in freight, energy and blue economy development. In particular the development and progression of offshore wind energy will require substantial maritime and port-side activity, including service vessels, tugs, construction barges, and crew transfers. Making sure these operations can use sustainable fuels is key to preventing long-term dependence on fossil fuels during the rapid expansion of infrastructure. Cork is ideally placed to pioneer low-emission logistics solutions for offshore renewable development and the RTFO and associated incentives should support this opportunity.

This strategy also has the opportunity to encourage the development and deployment of Sustainable Aviation Fuel (SAF). As Ireland's fastest growing airport, Cork Airport must be supported in transitioning toward low-carbon aviation solutions. SAF is essential to decarbonising this sector, and Cork Chamber welcomes the inclusion of SAF within the RTFO framework and ReFuelEU mandate. We recommend increased support for SAF supply chain development, regional airport readiness, and airline adoption to ensure SAF availability is not limited to any one region. Furthermore, regional airports have the potential to become strategic clusters of excellence for sustainable aviation, serving as innovation hubs for Sustainable Aviation Fuel research, testing, and deployment. Supporting these developments in would demonstrate national leadership in climate action and reinforce Ireland's commitment to a low-carbon future in line with EU and global targets. With Cork's potential for offshore renewables, Cork could be targeted as a key European site for the development Sustainable Aviation Fuels from this potential energy source.

As a final recommendation, given Cork's strategic role in offshore wind development, green hydrogen innovation, and port-based logistics, it is essential that Cork based stakeholders are represented on any working groups already established or planned under this Strategy. Cork is also ideally positioned and should be strongly considered as a location to pilot any projects in the renewable fuel switching space that might emerge as a result of this Strategy.

Cork Chamber is grateful for the opportunity to contribute to this consultation, we look forward to the outcome and hope our observations and recommendations will be considered.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Conor Healy'.

Conor Healy

CEO