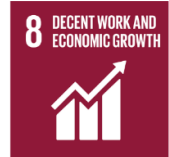




**Chambers
Ireland**
Advancing business together



Draft Revision of the National Ports Policy 2013

Submission by Chambers Ireland

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About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Executive Summary

Ports are the physical link between an island economy and its markets. More than 90% of traded goods by volume¹ pass through the State-owned commercial port network. The draft policy is therefore directly relevant to the cost and reliability of trade, the State's ability to withstand disruption to that trade and the infrastructure needed for offshore renewable energy.

The ports policy is strongest where it recognises the need to expand capacity, changes the previous position on State support, reaffirms the role of Ports of National Significance and treats ports as core enablers of the energy transition. Its weakness is that several of its most important commitments remain discretionary, are not matched by funding routes, or rely on outdated policy that no longer reflects the full context in terms of investment.

Accordingly the policy should move to a practical national investment and implementation framework. The policy must provide sufficient certainty on funding, offshore renewables and supporting infrastructure to facilitate long-term investment decisions. It should focus on protecting existing trade capacity, account for additional capacity grounded in evidence, make full use of suitable assets around the coast, and align port projects with road, rail, grid, utility, planning and offshore auction timelines.

Fundamental to the policy's success is recognising the different roles, strengths and constraints that exist across the ports network. Alongside addressing capacity requirements and strengthening connectivity, the policy should recognise the distinct but complementary role that smaller ports play in supporting maritime activity, supply chain resilience and contributing to regional economies.

¹ As set out in the consultation document:

https://assets.gov.ie/static/documents/b3a02bf2/Revision_National_Ports_Policy_Consultation_version.pdf, pg 3.

Key Recommendations

1. Create a strategic port investment framework

Publish eligibility, appraisal and project-selection criteria for Exchequer support, State-backed finance and EU co-funding. Support should be tied to additional national capacity, resilience, decarbonisation or offshore renewable energy needs, with clear safeguards against distortion of competition.

2. Plan capacity nationally and protect operational land

Adopt a capacity-first approach for nationally significant port land. Maximise and expand suitable existing assets, protect land needed for port operations and compare all credible capacity options before committing to major new infrastructure.

3. Coordinate the infrastructure outside the port gate

Require an enabling-infrastructure plan for every major strategic port development by aligning road, rail, grid, water, wastewater, energy infrastructure and local land-use decisions with the port masterplan.

4. Set service standards for approvals and connections

Place reciprocal, time-bound duties on planning, marine, environmental, licensing, utility and grid bodies whose decisions determine whether port projects can proceed.

5. Build a single digital system for port users

Develop a national Port Community System linking the relevant State inspection and border agencies with port and logistics operators, supported by consistent, appropriately aggregated freight-flow data.

6. Align ports with the offshore renewable energy pipeline

Publish a clear timetable for the National DMAP process and align it with a multi-annual offshore renewable energy auction schedule, grid development, port investment and the distinct infrastructure requirements of fixed and floating offshore wind.

7. Retain more offshore value in Ireland

Connect port investment with a national supply-chain, skills and enterprise programme covering engineering, logistics, marine services, manufacturing, operations and maintenance, and emerging clean-energy activity. This should include measures to help Irish businesses compete for contracts and structured cooperation between ports, enterprise agencies, education providers and industry.

8. Fund maritime and landside decarbonisation fairly

Treat shore power, grid reinforcement, alternative-fuel infrastructure and heavy-goods charging as enabling infrastructure. Avoid passing the full cost of State-mandated transition measures to port users.

9. Use rail where it adds national value

Prioritise rail connections and terminals where demand, distance, capacity and emissions benefits support them. Where the State requires provision in advance of commercial demand, the funding model should reflect the public-policy element.

10. Test resilience across complete routes

Assess ports, destination ports, sea routes, digital systems, access corridors and diversion capacity together, with practical contingency plans and periodic exercises.

11. Resolve governance questions transparently

Complete the Rosslare Europort ownership review against clear commercial and investment tests. Before restructuring the IMDO, publish the rationale, functions, costs, governance and intended benefits, and avoid adding a new layer of approval.

12. Make implementation measurable

Performance measures should recognise capacity, reliability, resilience, decarbonisation and regional value, not throughput and profitability alone

13. Align ports policy with the Critical Infrastructure Act

Clarify the criteria under which nationally strategic port developments may be considered through the Critical Infrastructure Act framework.

Our Perspective

The revised National Ports Policy reflects the increasingly strategic role that ports play in the State's economic development. Ports are critical enablers of energy security, offshore renewable energy deployment, strengthening supply chains and regional development. Taken together, these factors increase the ability of the State to remain competitive in an increasingly uncertain geopolitical environment.

The policy should not be interpreted as requiring identical roles for all ports. Investment should reflect the strategic function that an individual port or project can perform, the capacity it can provide and its contribution to national objectives.

Planning for additional capacity should proceed, given the constraints identified in the draft policy. However, a final investment decision should follow an objective assessment of the additional capacity that can be provided by existing and proposed developments across the national port network.

Renewable Energy and Decarbonisation

The Policy should recognise ports as central to energy security, offshore renewable energy deployment and the ability of the State to build an indigenous renewable energy base.

The European Commission has identified offshore renewables as a major pillar of Europe's electricity system, with EU countries setting regional cumulative offshore goals of 86 to 89 GW by 2030 and 355 to 366 GW by 2050.² Since 2021, the State has adopted a plan-led DMAP system, published a long-term Future Framework³ with ambitions of 20 GW by 2040 and at least 37 GW by 2050, along with developing an offshore wind industrial strategy. The policy should therefore be accompanied by sufficient visibility on the scale, location and sequencing of offshore development. Ports cannot make commercially responsible investment decisions where the relevant DMAP, auction, grid and developer timelines remain uncertain.

The ability to develop offshore wind and emerging renewable technologies located offshore will depend on generation capacity at sea in addition to the availability of ports capable of supporting construction, assembly, installation, operations and maintenance. Without adequate port capacity, offshore renewable energy projects become harder to deliver, more expensive and an increased risk of delay.⁴

Recommendations:

1. Design and implement an Offshore Renewable Energy Ports Strategy. Set out: the functions required at each development stage; objective criteria for port capability; alignment with DMAP, auction and grid timelines; a multi-annual investment pipeline; the

² https://energy.ec.europa.eu/topics/renewable-energy/offshore-renewable-energy_en

³ <https://www.gov.ie/en/department-of-climate-energy-and-the-environment/publications/future-framework-for-offshore-renewable-energy/>

⁴ For example, turbine components, equipment, operations and maintenance activity, supply chain services and future renewable hydrogen infrastructure all depend on port capacity: <https://windeurope.org/news/upscaling-europes-port-infrastructure-critical-for-offshore-wind-development/>

approach to a range of renewable technologies such as fixed and floating wind; and arrangements for periodic review. These criteria should include water depth, navigational access, load-bearing capacity, wet-storage potential, available development land, proximity to designated development areas, grid and transport connections, planning readiness and the potential to support industrial clustering.

2. A multi-port model should be maintained while identifying the distinct functions required across the network. Construction, assembly, deployment, wet storage and long-term operations and maintenance do not necessarily require the same facilities or locations. Applying national criteria to each function would allow ports with different characteristics to contribute without assuming that every port should provide the same infrastructure. This should include recognising the potential role of deep-water Atlantic locations in supporting floating offshore wind, renewable fuels, industrial clustering and associated supply-chain activity where they meet the relevant national criteria.

Offshore wind delivery

Offshore wind projects depend on specialised port infrastructure at almost every stage of their lifecycle. Turbine blades, towers, foundations, cables, substations and other major components must be transported, stored, assembled and loaded through ports before installation at sea. Once projects are operational, they continue to act as bases for maintenance vessels, technicians, spare parts, repairs and long-term servicing.

The scale of modern offshore wind infrastructure makes this especially important. Larger turbines require greater storage space and sufficient landside space for marshalling and assembly. Our offshore supply chain is only as strong as the ports and vessels that support it, and ports will need upgraded quays, deeper berths and significantly more space as turbines become larger and deployment accelerates.

Consequently investment cannot be treated as an isolated downstream issue. Development must be planned in parallel with offshore renewable energy targets; where port capacity is not

available at the right time, projects face delays even where planning consent, grid connection and investment are otherwise in place.

Developing green skills

Investment should facilitate opportunities that extend beyond the construction of port facilities (for example construction, deployment, long-term servicing functions and specialist professional services).

These opportunities will require coordination between ports, relevant agencies, education and training providers and industry. Skills planning should be connected to the expected offshore development pipeline so that capability is available before projects enter construction.

Recommendation:

Develop a national offshore renewable energy supply-chain and skills programme linked to the port investment and auction pipeline. Report on participation, workforce requirements and long-term operations-and-maintenance activity.

Supporting emerging technologies

Offshore renewable energy would create opportunities in electricity generation and a host of other technologies such as renewable hydrogen and storage as these markets develop. In practical terms, this means ports can become anchor points for new industrial activity which contributes to the region within which they are based. They can connect offshore generation with onshore demand, provide space for energy-related businesses, support manufacturing and servicing activity and strengthen regional economic development by providing employment across related industries.

In terms of emerging technologies, floating offshore wind is particularly relevant because it can open access to deeper waters where fixed-bottom turbines may not be suitable. In addition floating wind places even greater demands on port infrastructure. Unlike some fixed-bottom projects, floating wind requires large-scale assembly of floating platforms and turbines at port

before they are towed to sea. This requires deep-water access, extensive quayside areas, large storage and assembly space, strong load-bearing capacity and suitable marine access. Port upgrades will be essential to avoid bottlenecks when deploying this kind of infrastructure.⁵

Ports will also be important for wave, tidal and other marine renewable technologies as they move to commercial deployment. These technologies will require testing facilities, deployment bases, maintenance capability, specialist vessels and engineering support. Opportunities associated with floating offshore wind are particularly relevant for locations with deep-water access, available development land and the capacity to support associated industrial activity. This is critical for the State in positioning itself for renewable technologies as they mature.

Recommendation:

Public funding should be staged against technology maturity, project pipeline and demonstrable shared use, avoiding premature investment in facilities without a credible route to demand.

Decarbonising Ports and Hinterland Freight

Ports will require shore power, alternative-fuel infrastructure⁶ and stronger electricity connections to meet national and EU decarbonisation requirements. Investment must be coordinated with grid delivery so that ports are not required to install infrastructure before sufficient power is available.

⁵ <https://fowcoe.co.uk/wp-content/uploads/2024/03/FOW-CoE-PR50-Port-Infrastructure-and-Manufacturing-Investment-Models.pdf>

⁶ https://transport.ec.europa.eu/transport-themes/clean-transport/alternative-fuels-sustainable-mobility-europe/alternative-fuels-infrastructure_en

Road freight will remain central to port connectivity⁷. The policy should therefore address charging infrastructure for lower-emission heavy goods vehicles and ensure that the exceptional costs of State-mandated electrification are not simply passed through to port users and businesses.

Recommendation:

Publish a costed implementation plan for shore power, alternative fuels and zero-emission HGV infrastructure at ports. The plan should identify grid requirements, land needs, delivery responsibilities and the treatment of costs that cannot reasonably be recovered from port users.

A National Approach to Capacity and Investment

Strategic infrastructure must be progressed in anticipation of future needs if the State is to maintain deliver a competitive policy for ports, particularly in areas such as offshore renewable energy. Different projects will require different financing solutions encompassing a combination of public investment, private capital and appropriate risk-sharing mechanisms. Ensuring these routes are available is important if strategically important projects are to proceed in a timely manner.

Ports are long-life infrastructure and planning, consent, finance and construction must begin before demand becomes a binding constraint. The Irish Ports Capacity Study, as summarised in the consultation document, found that planned developments could provide sufficient capacity to approximately 2040 only if the required investment, equipment and hinterland connections are delivered on time. It is also acknowledged in the IMDO's conclusion that capacity equivalent to a new port will be required on the east coast after 2040.

⁷ See further for more on travel patterns and corresponding energy demand: <https://www.seai.ie/data-and-insights/seai-statistics/transport>

Those findings require action now but they do not justify a single test based on existing throughput because historic cargo patterns reflect the infrastructure and services already available. If used in isolation, they risk directing future investment towards existing concentrations and undervaluing spare capacity, development land, deep water, route diversity and resilience elsewhere.

Accordingly, additional capacity should be assessed against a consistent set of published national criteria across the port network, while continuing planning for additional east-coast capacity. This allows the State to address the immediate constraints around its largest gateway without closing off lower-cost or more resilient options elsewhere.

Recommendation:

Amend policy Objective 6 so that post-2040 investment is based on a national options assessment covering all Ports of National Significance and other credible proposals. The assessment should compare deliverable capacity, cost, timing, environmental effects, hinterland congestion, route resilience, land availability, deep-water access and regional economic impact. East-coast masterplanning should proceed but should not pre-empt that appraisal; the need to begin planning additional capacity does not remove the parallel requirement to maximise deliverable capacity within the existing network over the short and medium term.

Use of port land

Operational port land is essential to handling and assembling the components required for offshore renewable energy infrastructure and is difficult to replace once lost. This is one of the core reasons behind the inability of ports other than Belfast port to land and assemble core components on the island of Ireland⁸.

⁸ <https://www.belfast-harbour.co.uk/news/plans-for-major-offshore-wind-hub-at-belfast-harbour-underway-with-announcement-of-100m-landmark-deal/>

Local land-use decisions can have national consequences where they reduce freight-handling capacity or constrain access to strategic infrastructure. In addition, once operational land is lost to an incompatible use, it can be difficult, expensive and time-consuming to replace.

The final policy should give port masterplans and land required for nationally significant operations clear standing in the planning hierarchy. It should also require periodic review of land occupied by obsolete, duplicated or underused State facilities so that it can be returned to operational use where this is safe and practicable.

Recommendations:

1. Introduce a national planning designation or equivalent policy protection for land demonstrably required for current or future port operations.
2. Require State bodies occupying port land to review its use with the relevant port and consolidate facilities where this can release capacity without weakening controls.
3. Port masterplans and identified future land requirements should be reflected in the National Planning Framework, Regional Spatial and Economic Strategies and relevant development plans.

A bankable investment framework

The revision of the prohibition on Exchequer support is necessary. However, retaining an option to invest on a case-by-case basis is not enough for projects that must incur substantial planning, environmental and enabling costs before revenues are certain. This is relevant where a project serves wider State objectives but the port cannot recover the full cost from users without weakening competitiveness.

Commercially recoverable port investment should be distinguished from the public-policy element of a project. This should encompass a mix of grants, loans, guarantees, State-backed borrowing, private capital and European funding. Depending on the nature of the project, this may involve the Department of Transport, NewERA, the Ireland Strategic Investment Fund, the European Investment Bank, Connecting Europe Facility support and private capital. They should

also respect State-aid rules and avoid supporting local projects that do not add national or regional strategic value.

Additionally, the public-policy element may include capacity maintained for early-stage expenditure incurred before offshore revenues are certain, or other aspects such as shared dredging, road or bridge infrastructure required to comply with State or European decarbonisation obligations.

Recommendations:

1. Publish a Strategic Port Infrastructure Funding Framework with: eligible objectives; appraisal criteria; the treatment of wider public benefits; available instruments; competition safeguards; State-aid compliance; requirements for private co-investment where appropriate; and a rolling, multi-annual pipeline of candidate projects.
2. Strategic port developments that make a substantial contribution to trade capacity, offshore renewable energy, energy security or supply-chain resilience should be assessed for alignment with the Critical Infrastructure Act.

Dividend Policy

Port users should not be charged for a capital programme only for the same earnings to be extracted before that programme is delivered. Dividend policy should remain disciplined while still reflecting approved masterplans and requirements for European grants, borrowing agreements and the timing of major investments.

Recommendation:

Dividend decisions should be made after assessing the port's approved capital programme and funding obligations. Earnings formally committed to nationally strategic projects should be capable of retention, subject to shareholder oversight, published milestones and value-for-money controls.

Joined-up Port Infrastructure

Port capacity depends on the availability of reliable infrastructure, dredging and access to suitable land. Current examples include the strategic road corridors serving Rosslare, the Limerick-Foynes road and rail connections, grid and utility capacity required for offshore renewable energy, and access improvements needed to allow regional ports to absorb additional or diverted traffic. Where a masterplan may be viewed as credible, it nonetheless may still be unable to proceed because decisions or works outside of its control are not aligned.

Delays can leave public and private expenditure stranded and misaligned planning, consenting and infrastructure timelines increase financing and construction costs. Ultimately these are the consequences of infrastructural deficiencies that are outside a port's control. Aligning the delivery of such infrastructure with port masterplans would reduce project risk and help ensure that investment is not delayed by such dependencies.

Recommendation:

Require a single enabling-infrastructure plan for each major strategic port project. The plan should identify the responsible body, consent, funding decision and target date for each road, rail, grid, water, wastewater, dredging, energy-network and land-use dependency. Progress should be reported through the National Ports Policy implementation process.

Planning and consenting

Strong assessment and timely decisions are compatible when competent authorities are properly resourced, baseline data are available and issues are identified before an application is lodged. This is important to ensure that relevant projects can proceed within reasonable delivery timelines and avoid unnecessary delays. Early data collection, proper resourcing and coordinated assessment should ensure that projects with demonstrable benefits can receive timely decisions.

Recommendations:

1. Set published service standards for strategic port applications and related marine, environmental, licensing and grid processes.
2. Provide coordinated pre-application engagement, adequate specialist resources and a shared programme for marine and ecological baseline data. The standards should preserve the independence of decisionmakers and all statutory environmental tests.

Road and rail connectivity

New capacity is of limited value without hinterland connections. Priority should be placed on completing strategic road links to ports and removing bottlenecks on freight corridors and protecting access routes from incompatible development. Rail should form part of an integrated freight policy, but investment should reflect the market served, distance, available port land and the capacity that a terminal would displace. As an example, the rehabilitation of the Foynes-Limerick freight line demonstrates the potential for rail where a port's cargo profile, distance to markets and supporting infrastructure provide a credible basis for modal shift. The same port-specific approach should ensure that nationally important road corridors serving direct international gateways are delivered in line with forecast port growth.

This points to a differentiated approach. Rail-connected ports with suitable geography and cargo should be enabled to expand rail freight. At ports where the commercial case is weaker or scarce operational land would be displaced, the national benefit should be demonstrated and the State should meet the public-policy cost rather than placing it entirely on port users.

Recommendation:

Prepare port-specific hinterland plans. Prioritise road and rail schemes that unlock additional capacity, reduce congestion or provide a credible modal shift. Where mandatory rail provision exceeds foreseeable commercial demand, provide a separate State funding mechanism and protect core trade capacity.

Keeping Trade Moving at a Lower Cost

Infrastructure is only one source of capacity. Better coordination between the State agencies operating at ports can reduce duplication, shorten dwell times and make more effective use of existing land. Businesses should not have to navigate parallel systems for the same movement of goods where information can lawfully and securely be shared.

A national Port Community System would provide a common operational layer for ports, terminals, shipping lines, hauliers and the relevant State bodies. It should be designed around the user journey and support future inland or bonded facilities. The objective is not a new reporting burden; it is to replace fragmented processes and create a reliable evidence base for capacity and freight planning.

Recommendation:

Establish a Port Community System implementation group involving ports, terminal and logistics operators, Revenue, the Department of Agriculture, Food and the Marine and the relevant health authorities. Publish the system's scope, data-governance arrangements, interoperability requirements and phased implementation plan.

Supporting new maritime services

Port infrastructure and spare capacity will not, by themselves, secure new shipping services. The State should support the preparation of credible route business cases, including analysis of cargo demand, inland transport costs, operating conditions and potential customer volumes. Support should focus on routes capable of improving connectivity, resilience or the efficient use of national capacity.

Recommendation:

Assign clear responsibility for evidence-based route development and engagement with shipping lines and cargo owners. This function should not depend on a decision to restructure the IMDO.

Freight and performance data

Throughput is an important measure but is insufficient on its own for national planning. The State needs aggregated information on cargo origin and destination, inland movement, dwell time, diversion capacity, and the use of road and rail. This would improve investment decisions without disclosing commercially sensitive information.

Recommendation:

Develop a common data standard and publish aggregated national indicators. Performance measurement should cover reliability, capacity utilisation, emergency capacity, connectivity, emissions, offshore renewable energy readiness and the wider value created by strategic assets.

Resilience, Security and Route Diversity

The closure of Holyhead in December 2024 demonstrated that supply-chain resilience depends on both ends of a route. Testing only infrastructure within Irish ports would miss destination-port failure and the ability of alternative gateways to absorb diverted traffic.

A diversified network reduces dependence on any single port or sea route, but resilience entails knowing which alternatives are viable, what capacity they can absorb, how quickly traffic can be redirected and which transport or customs constraints would prevent that response.

Resilience planning should also identify the practical contribution that smaller and regional ports could make during disruption, including the traffic or maritime services they could accommodate and the constraints that would prevent their use.

Recommendation:

Expand Policy Objective 17 into route-based resilience testing. Scenarios should include closure or reduced capacity at an Irish port, disruption at a destination port, cyberattack, severe weather, loss of a key road or rail corridor and sudden diversion of passenger or freight traffic. Publish high-level findings and a time-bound programme to close material gaps.