



Limerick Chamber
Submission on the Review
of National Ports Policy
Issues Paper

January 2024



1.0 Introduction

Limerick Chamber would like to thank the Department of Transport for the opportunity to submit our members' views on the Review of the National Ports Policy.

Limerick Chamber is the largest business representation organisation in the Mid-West, boasting a membership of over 400 businesses and over 50,000 employees. Limerick Chamber represents a wide array of businesses across the region from local retailers, indigenous exporters, renewable energy companies, logistics providers, to multinational corporations and everything in between.

Over the last several years, Limerick Chamber has taken significant and proactive approach to leveraging the economic potential of our maritime area including having three Chamber representatives on the Shannon Estuary Economic Taskforce (SEETF). The Chamber supports a review of Irish ports policy and welcome the timely nature to support ports, and the wider maritime area, as a key enabler to the national, regional and local economies.

2.0 Issues Paper Questions

1. Climate Change

A. Climate Adaption and Mitigation

Q1 - What are the main climate-related risks to port infrastructure and operations?

A1 - Port infrastructure and operations face various climate-related hazards, such as heat waves, extreme winds, and precipitation. Among these risks, the most significant threat arises from rising sea levels and the corresponding extreme sea levels. The elevation in sea levels is a consequence of global warming, while extreme sea levels are a byproduct of storm surges and intense waves. These critical dangers can result in either permanent or temporary flooding at ports, along with coastal land subsidence, potentially leading to the complete cessation of port activities and harm to critical infrastructure. Consequently, this may result in revenue losses for logistics operations and disruptions in trade due to downtime, thereby causing cascading economic impacts on the region and country.

Q2 - What policies or structures (including investment criteria, planning requirements or cross-cutting sustainability considerations) currently drive progress towards building climate resilience in Irish Ports?

A2 - To our knowledge, there are no existing policies or frameworks aimed at enhancing climate resilience in Irish ports. Thus, it is imperative to establish a robust policy framework that empowers port operators to promptly bolster resilience and adaptability. This framework should delve into the pivotal roles of modal shift, electrification, energy efficiency, and shore powering in assisting ports to effectively counteract the repercussions of climate change.

B. Environmental Regulation Framework

Q1 - How can ports contribute to the delivery of national climate targets set out in the Government's Climate Action Plan and Ireland's EU climate commitments, particularly those for the transport sector?

A1 - To align with national climate targets and EU commitments, ports need to undergo adaptation, necessitating the creation of suitable port infrastructure. Specifically within the transportation sector, ports can play a crucial role by offering shoreside electricity to incoming vessels and establishing bunkering facilities for alternative fuel supply. It is essential to establish refuelling stations for liquefied methane at maritime ports, particularly those integrated into the TEN-T core network. Additionally, ports can contribute to the establishment of green corridors, facilitating pathways for zero-carbon shipping. Furthermore, ports are critical pieces of infrastructure when thinking about the offshore wind potential in Ireland and will act as key nodes for importing critical components, and in some instances assembling or manufacturing key components.

2. Development of Offshore Renewable Energy

Q1 - What policies, structures or other measures would best support ports to develop the infrastructure necessary for the facilitation of ORE?

A1 - From liaising with our membership and wider industry we have identified energy policy, alternative fuels policy, enduring regime and a broader economic and social policy as key policy areas which must be supported. Further issues in recent industry analysis include 1) The resources and prioritisation given to planning and consents 2) Insufficient grid capacity and the resilience of the existing grid, 3) Funding support from central government 4) Clarity on timescales 5) Increased transparency, engagement and collaboration with industry and government bodies 6) Research & Development and 7) Supply Chain Support.

However, for the West Coast, The primary obstacle hindering the advancement of Offshore Renewable Energy (ORE), including attracting funding, revolves around the absence of a West Coast Designated Maritime Area Plan (DMAP). Similar to the South Coast DMAP, the west coast region necessitates a designated procurement target for the auction following Offshore Renewable Electricity Support Scheme (ORESS) 2.1.

Given that the South Coast is the exclusive area with a DMAP, other regions are unable to participate in ORESS 2.1 bidding. It is crucial to establish a definitive timeline for the implementation of a sufficiently substantial West Coast DMAP, capable of supporting an annual run rate of at least 500MW over the long term, ensuring the viability of essential infrastructure. This timeline is likely required before the conclusion of the ongoing consultation. The forthcoming Ports Policy should provide guidance on the investment process and decision-making, aligning with the EU Offshore Renewables Strategy (ORES) and Maritime Area Planning policy, which are crucial for ORE development facilitated by ports.

Limerick Chamber urges that when drafting a ports policy for Ireland that Government and departments consider the allocation of investment based on key characteristics which are required for developing ORE at scale, namely; deep water facilities, adequate wet storage, proximity to resources, grid connection and existing onshore infrastructure.

The Shannon Estuary Economic Taskforce (SEETF) has pinpointed ORE and the transformation of the Shannon Estuary into a marshalling port as the principal economic prospect both from a regional and national perspective. The taskforce underscored the interconnected nature of the essential processes and the involvement of various government departments required to realise ORE opportunities. Emphasising the urgency, SEETF stressed that progress on all identified fronts must be made promptly. Additionally, SEETF acknowledged Ireland's international competition in this sector, highlighting the current advancement of competitor nations in the field.

The leading international consulting engineers, Bechtel, identified significant capacity scenarios for the Shannon Estuary that should serve as a planning basis for future port capacity requirements. The three scenarios outlined in the report, low, medium and high, reflect varying generation capacities capable of being delivered in the Shannon Estuary by 2050. These capacities were 10GW, 20GW and 30GW. The analysis from Bechtel also highlights the annual ORE build out required to reach the various scenarios. While ports should be targeting c. 50GW over a 25 - 30 year timeline, a cumulative target is more appropriate from a commercial point of view.

Therefore, Limerick Chamber recommends that this ports policy should consider the opportunity for Shannon Foynes Port to be development as a potential staging platform for investment in ORE infrastructure development. This recommendation, if fulfilled, would provide capital investment opportunities over a large time scale and would support development infrastructure at scale.



3. Integrated Logistics Chain

Q1 - How can integrated logistics policy between maritime transport and other transport and logistics modes be developed?

A1 - Currently, Shannon Foynes Port Company is working with Irish Rail to ensure that the necessary rail infrastructure, to facilitate a modal shift, will be in place by 2025 at Foynes Port. This will allow alternative logistics solutions and will allow cargo to be moved by a more sustainable rail network, rather than focusing solely on the road network. In essence, it will provide greater options from a logistics and planning perspective.

Having said that, the Limerick to Foynes Road, offers significant opportunities to move heavy cargo away from the current inadequate road network and will provide increased route diversification and shorter and more sustainable journeys.

Ultimately, increased logistic diversification leads to increased transit savings from both a carbon and financial perspective and will allow Ireland, and indeed the West and Mid-West to remain as an attractive logistics proposition.

This holistic approach to sustainable and multi-modal transit currently being undertaken by Shannon Foynes Port Company and other State Agencies provides for a scalable transit solution due to the ports location, its sheltered deep water port and its proximity to key markets and connections.

However, this pioneering, innovative and integrated multi-modal solution is not without its obstacles. There are perceived barriers to change, particularly the move away from the East Coast and Dublin centric model, the lack of detailed data in terms of logistic and traffic flows and perhaps a lack of awareness in the market.

The ports policy should particularly attempt to rectify the perceived East Coast and Dublin centric issue as part of Project Ireland 2040 and the goals to grow the economic potential of regions outside Dublin.

Q2 - How can greater use of rail freight to and from our seaports be encouraged? what measures to promote such usage could be introduced?

A2 - To promote increased utilisation of rail freight to and from Irish seaports, Limerick Chamber advocates for further enhancements to rail infrastructure through investment.

The development of rail freight capacity should be synchronised with port expansions of capacity to ensure an optimal outcome. The Strategic Rail Review should thoroughly assess the rail network, focusing on the potential role of rail freight and the potential to combine this with passenger carrying capability. In the context of the Mid-West, and indeed Shannon Foynes Port, the reopening of the Foynes-Limerick line should incorporate additional upgrades to accommodate heightened freight capacity and the inclusion of passenger carriages.

There is potential for Ireland to promote trucking for "first and last mile", meaning cargo that can be transported by rail utilises the road network for the first and last segments of its journey, however, the largest portion of its journey will be by rail. There is a similar concept in micro mobility public transport, where a commuter will use a scooter or bicycle for the first and last portion of their journey, but use public transport for the majority of their journey.

While investment is critical, so too is viability and financial viability. There is a case to be made that freight lines to seaports could also be used as commuter rail links with stops along the line being built up with housing and other services. For example, the Limerick to Foynes Rail Line travels from Foynes to Colbert Station in Limerick, passing through or near Adare, Patrickswell, Raheen, Dooradoyle and Ballinacura. All existing residential areas.

To encourage greater use of the rail network, Ireland should make the rail network available to all, while constructing high density developments along or near the line where possible. This would help to ensure financial viability by utilising a two pronged approach.

Q3 - Are there further measures that could improve connectivity for both passengers and freight with mainland Europe?

A3 - Aligning development with the TEN-T network aims to enhance connectivity for both passengers and freight between Ireland and mainland Europe. This involves upgrading intercity and regional rail lines, enhancing port facilities, establishing efficient rail services connecting ports, cities, and airports, constructing multi-modal freight terminals, and fostering improved integration at both local and national levels.

With that in mind, Ireland is an island nation and to ensure that we engender the connectivity that will bring us closer to Europe we must also prioritise air travel, in conjunction with sea and rail. Because of this, Limerick Chamber has continually advocated for Shannon Airport to be included, long-term, in the Regional Airports Programme and greater supports for public service obligation routes to a Northern European hub, [Limerick Chamber has continually made submissions in support of this.](#)

4. Transition to the Circular Economy

Q1 - How can ports best prepare, and show resilience, in response to an EU and national level move towards a circular economy?

A1 - Moving towards the adoption of circular processes in ports requires a multifaceted approach that involves a combination of many variables; waste reduction and recycling, energy efficiency, use of renewable energy, water conservation and recycling, green and sustainable infrastructure, encouraging circular supply chains and logistics, adopting alternative fuels, collaborating with circular economy partners, research and development and of course keeping up to date with the latest regulatory and certification requirements. Of course, like with any positive disruption, there must be the appropriate policy and supports in place to aid with adoption of new practices.

Ports should actively explore and recognise current or potential circular processes by assessing their inputs and outputs. As mentioned, this likely entails establishing suitable waste management infrastructure and recycling facilities, enabling the transformation of various inputs for further use. In the case of non-renewable resources, there is an opportunity to convert them into carbon-neutral fuels through additional infrastructure development and investment. Moreover, the advancement of ORE will contribute to the resilience of ports by offering an alternative to the dependency on non-renewable fuels.

Q2 - What policies or other measures would assist ports in the move towards a circular economy?

A2 - The first step in this regard would be to develop a dedicated policy framework addressing the Circular Economy within ports, as well as the broader circular economy aspects in the transport sector. This will facilitate the transition of ports towards circular practices and contribute to the overall circularity of the transportation and logistics industry. Additional measures that should be adopted include establishing frameworks for the lifecycle management of port infrastructure and implementing energy management and monitoring processes to ensure adherence to circular principles.

However, in the medium to long-term there are a number of initiatives which could be examined such as extended producer responsibility (EPR), green procurement policies and circular economy certification for logistics and transport hubs.

5. Port Capacity

Q1 - What impediments, if any, currently exist for the planning and provision of future ports developments?

A1 - The importance of the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) support for port policy cannot be overstated. This backing is vital for funding applications, addressing environmental challenges, and establishing Imperative Reasons of Overriding Public Interest. The necessity for additional port infrastructure must be clearly articulated in national and regional plans. Project Ireland 2040 is critical in this regard, future reviews of both documents making up Project Ireland 2040 must continue to support future port development.

Again, taking a lead from the overarching plan, Project Ireland 2040, by guiding local plans. Inclusion of port infrastructure provision in county development plans is crucial. Allocating sufficient zoned land for port facilities and potential expansion should extend well beyond the typical planning period of six years, considering the extended timelines associated with funding, planning, design, and delivery. In conjunction with this, anticipating the secondary needs resulting from future port developments and planning for them at an early stage is essential. There should be increased synergy among various providers responsible for delivering new servicing requirements, including roads, rail, access, and grid transmission.

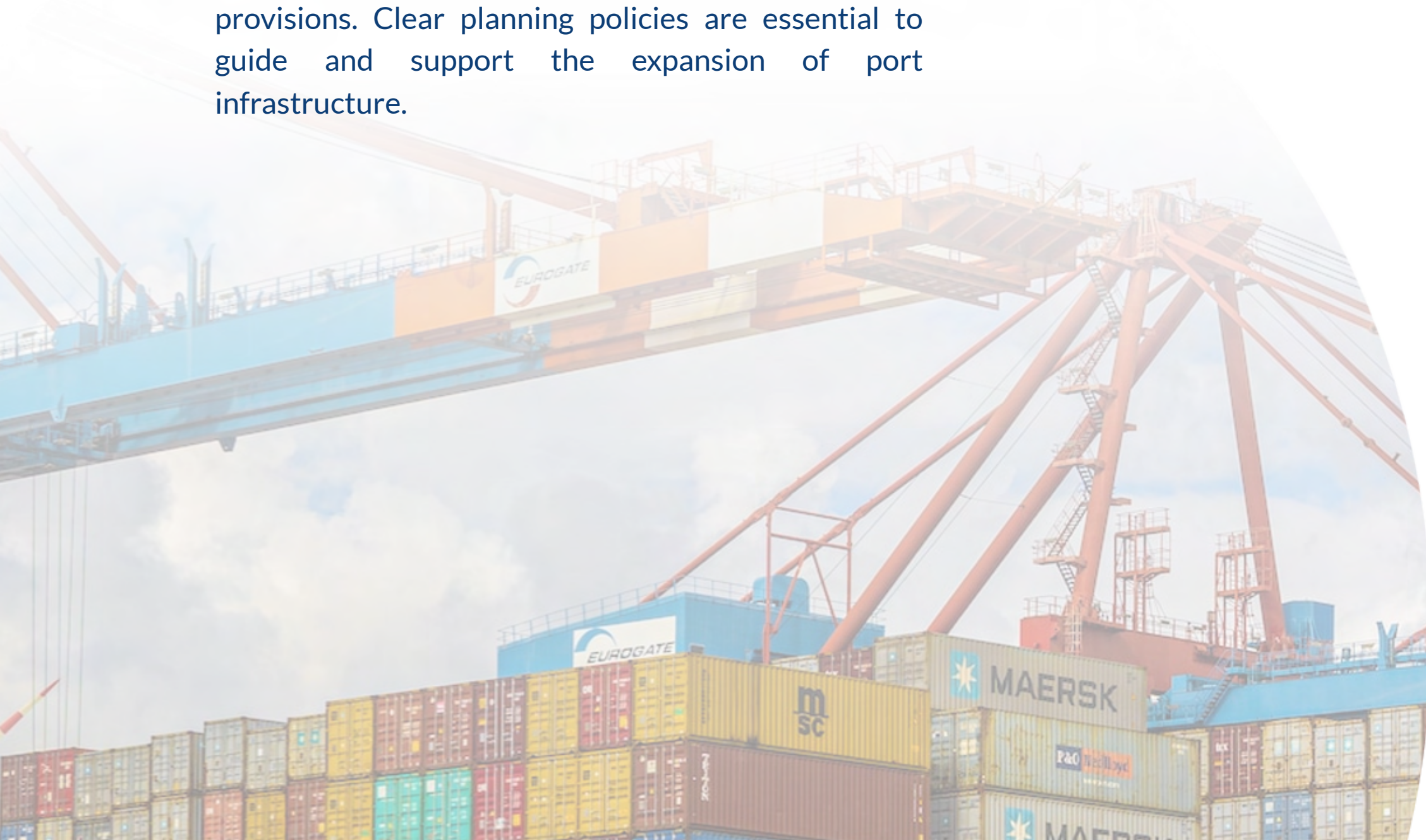
In this regard, achieving a balance between the substantial land requirements of an expanding port near a settlement and the spatial and infrastructure needs of a growing community presents a significant challenge. When conflicts arise in land use, the principle of expanding both the port and settlement at a specific location can hinder future port provisions. Clear planning policies are essential to guide and support the expansion of port infrastructure.

Port development is inherently challenging from an environmental standpoint, demanding a high standard of proof showing no adverse impacts. Insufficient comprehensive baseline environmental data, especially survey data spanning different seasons and a longer period, poses a significant obstacle to port development. Continuous environmental survey data collection in and around ports is necessary for effective planning and the submission of planning applications. Port infrastructure planning and construction require a considerable amount of time. Balancing the preservation of the natural environment, biodiversity, and project development is challenging. Additionally, there is a lack of clarity regarding funding strategies for future port developments.

Q2 - Can expansion at existing ports address any future capacity deficit or should a new port be planned to offset port capacity requirements as we approach 2040?

A2 - With the appropriate planning and investment, existing ports can address any future potential capacity benefit. There is a case to be made for "sweating the assets" i.e. better utilising existing infrastructure in place and expanding existing infrastructure where necessary. Limerick Chamber would encourage taking advantage of the embodied carbon already within existing ports, rather than emitting more for a new port.

One only needs to examine the masterplan for Shannon Foynes Port to see the potential for expansion. For example, including the new deep water port at Foynes Island would add significant capacity to the national supply chain. Furthermore, Foynes is already located at an uncongested node on the road and rail network, which cannot be said for other ports.



Q3 - Is there a compelling case to examine the current location of Dublin Port?

A3 - In the long-term it would make sense to examine the relocation of Dublin Port. Mainly from the perspective of freeing up land for housing, this will ensure more housing can be built closer to Dublin City Centre and thus reduce the need for private car commuting and indeed public transport usage. However, this is a high level view without examining any intricacies or future plans for the port. However, in tandem to examining relocating the port, it would be beneficial to examine existing or future capacity at other ports that could potentially see some traffic diverted from Dublin to these other Irish ports.

Q4 - Is policy action needed to address the demand for cruise berth capacity at Irish ports? If so, what measures should be taken?

A4 - Yes. As outlined in the SEETF report, one of the core recommendations was to provide funding for a study on establishing the Shannon Estuary as start and finish location for the international cruise ship industry (port and airport). There was also a key action of the report to establish a working group to understand and target the cruise industry. The result of these analyses will allow a more targeted policy approach to be developed.

6. Ports Funding

Q1 - Are the funding mechanisms available to the port companies sufficient to ensure adequate and efficient port capacity?

A1 - Limerick Chamber believes that for Ireland to fully utilise the potential for our ports and ORE ambitions that the funding model will need to change. The existing model has worked in the past, but to ensure adequate and efficient capacity into the future would mean that the existing funding or financing model is redundant and not fit for purpose. ORE has the potential to yield substantial benefits for the Irish economy. Nevertheless, there are instances where realising national economic advantages necessitates government investment up front until the risk profile allows for sustained private investment.

Irish ports lack the financial strength to execute projects of this magnitude, and the inherent risk associated with future ORE revenues poses challenges to private investment. While Connecting Europe Facility (CEF) funding will play a crucial role in project delivery, it alone cannot bridge the funding gap, and its availability is not guaranteed. A comprehensive and innovative approach is required to devise alternative funding mechanisms for Irish ports.

Q2 - Is further action required at a national level to ensure the port sector can attract sufficient funding, particularly private sector investment?

A2 - Certainly. Comprehensive collaboration is required on a national scale among key government departments and agencies with a special mention to include NewERA and the Irish Strategic Investment Fund with the goal to create investable vehicles for large scale port development.

Securing private sector investment for significant port development initiative proves challenging during the early stages due to uncertainties in future revenue streams from Offshore Renewable Energy (ORE) developers. This uncertainty impedes the attraction of commercial equity and debt investments in the initial project lifecycle. While the risk profile may evolve as projects mature, making commercial funding more appealing, government support and coordinated efforts are crucial in the project's early stages.

In the absence of direct exchequer funding, potential support mechanisms include state support on commercial lending, a strategy previously employed in other project-financed endeavors. This approach enables banks to operate in an environment where the state is cognisant of the entity's commitments, mitigating their exposure to underlying project cash flow risks. A transition plan could then be implemented, shifting towards a more project finance-oriented model as the project advances and revenues become more assured.

The Irish Strategic Investment Fund (ISIF) plays a pivotal role in the landscape of port funding. Their role involves finalising assessments, confirming decisions on supported ports and structures, and providing certainty to both the ports and the market regarding their stance.

It's essential to note that Ireland is not alone in facing these challenges. Other jurisdictions are experimenting with flexible and innovative approaches, such as involving ORE developers in funding port projects and subsequently sharing facilities with other developers based on the various stages of ORE development projects.

Q3 - How can ports best progress projects with a strong value case but a negative business case?

A3 - Large scale port projects should not be perceived or viewed merely as traditional port infrastructure initiatives but rather as energy nodes that deliver substantial economic and socio-economic advantages to the nation and region. As with any project, there are many positive economic spillovers that come from a project be that a financial or societal gain, however, what is often left out is a project that will achieve, or help to achieve, a specific policy goal, such as moving away from carbon intensive fuels. Therefore, all projects must be assessed on the sum of their positives.

For instance, the SEETF identified the potential creation of 50,000 additional green jobs by 2050 through the utilisation of Atlantic Wind Energy. It is this broader positive impact that will enhance the investment's value proposition. This strategy aligns with the National Industrial Strategy for Offshore Wind being developed by DETE, outlining a roadmap to ensure Ireland captures a significant share of the supply chain's value, fostering a scalable Offshore Renewable Energy (ORE) sector and maximising economic benefits across various market routes, such as new industrial demand and sustainable fuels development.

Currently, port capital expenditure under existing policies does not necessitate the creation of Public Spending Code documents, including Preliminary Business Cases. However, these documents are essential for the financial and economic evaluation of capital investment projects, demonstrating their value for money. This approach allows projects with a positive economic case to secure funding from Exchequer sources. A similar argument could be made for port investments that promise long-term economic benefits and broader societal advantages.

7. Technological Innovation

Q1 - How could a port community system be best introduced in Irish ports. Is a single national system across all Irish Ports possible?

A1- Limerick Chamber does not have the detailed in-depth port operation knowledge to answer this question. However, there is one point to note regarding data collection. Currently, Ireland does a poor job regarding imports and what their final destination is, along with other detailed logistics data. It would be appropriate with a port community system that Ireland begins to capture more detailed data which allows for better decision making.

Q2 - How can Irish ports be best protected from cyberattacks?

A2 - The European Union Directive on Security of Network and Information Systems (NIS) is the first EU-wide legislation on cybersecurity. While it focuses on ensuring the security of network and information systems across various sectors, it includes operators of essential services, which could encompass critical infrastructure like sea ports. Member states are required to identify operators of essential services and take measures to manage cybersecurity risks. However, it is unclear to date whether sea ports and their infrastructure are considered essential services or not, however, designating them essential services would be a first step in this regard.

There is scope within the Digital Europe Programme funding to strengthen the EU's strategic digital capacities, including cybersecurity. While not specific to sea ports, some of the initiatives under this program could have implications for enhancing the overall cybersecurity posture of critical infrastructure. However, there needs to be a collaborative effort between ports and state agencies, as well as members of the EU parliament, for Irish ports to tap into this funding stream.

While the European Maritime Single Window focuses on streamlining reporting processes for ships entering EU ports and it is not specifically a cybersecurity program, it emphasises the use of digital tools and technologies, which should include cybersecurity considerations, there needs to be greater representation at European level to ensure that this extends to funding for cybersecurity measures.

8. Upskilling and Diversifying the Maritime Labour Force

Q1 - What actions, if any, should be taken to ensure the ports and shipping sector has the skills necessary for the digital transformation of the sector?

A1 - We do not think it appropriate to solely examine the skills necessary for the digital transformation of the sector. While digital skills are critical of course, the maritime sector is about to undergo significant positive change regarding renewable energy therefore it is important to not lose sight of the holistic approach required to identify skills gaps and the training needed to rectify those gaps. Chamber Skillnets are primed to work with organisations in this regard.

Having said that, with the original question in mind, increased funding to undertake digital skills analysis would be required to examine what type of skills are deficient and then further funding and a mechanism is needed to address these issues, which could likely be administered through the local Skillnet.

Q2 - What steps, if any, should be taken to improve diversity and inclusion in the ports and shipping sector?

A2 - Like with any other intervention, firstly we must understand the current make-up of the maritime sector and what barriers are potentially in place for certain cohorts. Without a detailed understanding of this, we cannot say if there needs to be an improvement or not.

9. Governance

A. Organisation and Ownership Structure

Q1 - Are our current corporate governance controls appropriate, or are further improvements needed?

A1 - Limerick Chamber lacks the operation and procedural knowledge required to understand if existent corporate governance controls are appropriate or require improvement. We would urge the department to keenly listen to port operators in this regard. Having said that, as an outside organisation looking in, there appears to be some improvements which will improve efficiency. Swift government approvals and support for port projects will instill confidence in the market, ultimately

facilitating prompt access to funding sources crucial for initiating these projects, thus the likes of New ERA's review process must be completed in a timely manner. As mentioned previously, there also must be greater flexibility and autonomy in terms of acceptable investment structures which are required to delivery capital investment.

B. Rosslare Europort

Q1 - What, if any, changes are required to facilitate the future development of Rosslare Europort?

A1 - Limerick Chamber does not have the operation and procedural knowledge required to understand what is required for the future development of Rosslare Europort.

10. Accessibility

Q1 - What further actions should be taken to improve accessibility and customer experience at ports especially for persons with a disability, persons with reduced mobility and older people?

A1 - Port companies should collaborate with local authorities and regional assemblies to enhance the accessibility of transport infrastructure and the surrounding built environment. This involves guaranteeing that new or renovated structures are fully accessible to individuals with reduced mobility. Additionally, there should be a commitment to conducting periodic accessibility audits on the new infrastructure and built environment, carried out by trained and experienced auditors to see what improvements can be undertaken.

11. Enhancing Ireland's Maritime Connectivity

Q1 - What steps, if any, could ports and policymakers take to enhance and grow Ireland's international maritime services?

A1 - To enhance and grow Ireland's maritime services both ports and policy makers need to consider the issue outlined in this submission thus far to be summarised as, 1) Investment in infrastructure, 2) Integration of Technology 3) Diversity of connectivity and multi modal transport 4) Greater environmental sustainability 5) Skills development and training 6) Research and development 9) International collaboration and risk management and security.

However, one important item to note which has not been a large part of this consultation is the positive influence promotion and marketing can play for Irish ports at the international stage.

By focusing on these areas, both ports and policymakers can contribute to the growth and improvement of Ireland's international maritime services.

Q2 How can our maritime transport routes and services be encouraged to distribute more uniformly across the port network?

A2 - Project Ireland 2040, and its dependent policies are critical in this regard. Project Ireland 2040 provides a unique opportunity to balance the formerly lopsided development of Ireland with an extreme focus on Dublin and the East Coast. Through greater strategic planning, infrastructure investment outside the Greater Dublin Area (GDA) as well as policy support for a ports diversification process and indeed marketing and promotion of regional ports there is huge potential to become a more equally distributed network. By implementing a combination of these measures, stakeholders, including port authorities, government bodies, and shipping companies, can work collaboratively to encourage a more uniform distribution of maritime transport routes and services across the port network.

Q3 - How best can the visibility of the ports and shipping sector be improved in the mind of the public?

A3 - This is simply a case of brand management and marketing. There is likely minimal awareness among the general public as to the importance of our ports and shipping, and the potential future importance in developing ORE. However, this issue is easily overcome. There is scope for the Government, ports and local chambers to collaborate on public awareness campaigns, host events and education programs, organise open days and tours especially for school pupils and other interested stakeholders. These could be done in conjunction with partnering with tourism programmes. There is also the possibility of delivering online interactive platforms that visually aid people in understanding the sector more. Limerick Chamber's experience is also that industry awards and recognition are critical for both informing the public and potentially changing perception.

12. Port Marine Code

Q1 - What benefits might arise from the development of a port marine code? Would such a code assist Irish ports in complying with their regulatory obligations?

A1 - Consolidating all marine regulatory requirements into a single document would simplify the process of locating and implementing such information. A port marine code has the potential to address broader safety concerns and offer recommendations aligned with national and international standards, guiding ports in their operations. This code could function as a comprehensive framework, serving as a roadmap to improve governance, safety, and compliance within ports. As port development becomes more crucial, having such a code would provide a structured approach to assure stakeholders and meet evolving industry needs.



www.limerickchamber.ie

