Limerick Chamber
Advancing business together

National Ports Policy

Limerick Chamber Submission to Draft National Ports Policy

August 2026

Table of Contents

Summary of Final Policy Recommendations

01 Reshaping of the IMDO

Any reshaping of the IMDO must be subject to a wider consultation process whereby there it is explicitly stated the rationale and benefits and costs for such a change. Any expanded remit or standalone process must ensure that there are regional representatives at board level.

02 Establishing a West Coast Renewable Energy Pathway

Set out a clear West Coast / National DMAP timetable, aligned with a multiannual offshore renewable energy auction schedule, grid planning and port investment requirements.

03 Update the Offshore Renewable Energy Ports Strategy

Update the 2021 ORE ports statement to reflect the DMAP led system, fixed and floating wind requirements, port roles, investment costs and the Shannon Estuary opportunity.

04 Recognise Shannon Foynes as a Strategic Atlantic ORE Hub

Acknowledge Shannon Foynes and the wider Estuary as a strategic national hub for floating offshore renewable energy, green fuels, industrial clustering and supply chain development.

05 Recognise FIDD as Nationally Strategic Infrastructure

Recognise FIDD as nationally strategic enabling infrastructure for deep water capacity, ORE, rail connected logistics, trade resilience and balanced regional development.

06 Assess Shannon Foynes' Contribution to National Trade Capacity

Require future national port capacity assessments to examine the full trade and energy related capacity potential of Shannon Foynes before prioritising major new East Coast infrastructure.

07 Ensure Capacity Policy Supports Balanced Regional Development

Amend policy so future investment decisions are evidence based and assessed against regional development, supply chain resilience, emissions, congestion and available deep water capacity.

08 Develop a bankable State Funding Framework

Establish a dedicated strategic port infrastructure funding framework using Exchequer support, State backed borrowing, ISIF, NewERA, EIB, CEF and public private funding structures.

09 Align Ports Policy with the Critical Infrastructure Act

Recognise strategic port developments as potential Critical Infrastructure Projects where they support trade capacity, offshore renewable energy, energy security, climate action and supply chain resilience.

10 Coordinate Port, Road, Rail, Grid and Energy Infrastructure

Require cross departmental enabling infrastructure plans for major strategic port developments, aligning port investment with road, rail, grid, utility, energy and land use delivery timelines.

11 Reform Planning, Consenting and Environmental Preparation

Provide for early consenting engagement, properly resourced decision making bodies, clear timelines, protected port expansion lands and coordinated marine and ecological baseline data collection.

12 Balance Biodiversity Protection and Strategic Infrastructure Delivery

Confirm that biodiversity protection and nationally strategic port delivery are both public policy objectives, with robust existing environmental assessment supporting timely delivery of projects of national importance.

13 Design Performance Measures that Recognise Strategic Value

Ensure port performance metrics reflect strategic capacity, ORE readiness, wet storage, regional employment, rail freight, resilience, emissions reduction and emergency/diversion capacity.

14 Develop the Shannon Estuary Cruise Opportunity

Ensure the national cruise assessment examines the potential for the Shannon Estuary to operate as a start and finish cruise location linked to Shannon Airport and the wider tourism economy.

15 Align Dividend Policy with Strategic Investment

Allow ports implementing approved strategic masterplans to retain a greater share of earnings where funds are committed to nationally important infrastructure and EU funding match requirements.

Introduction & Background

Limerick Chamber welcomes the opportunity to respond to the consultation on the Draft National Ports Policy. As the largest business representative organisation in the Mid West, representing more than 400 businesses and over 50,000 employees, the Chamber has a strong interest in ensuring that national ports policy supports Ireland's international connectivity, energy transition and economic resilience, while also delivering meaningful and measurable balanced regional development. The Chamber's interest is particularly informed by the strategic importance of Shannon Foynes Port, the Foynes Island Deepwater Development (FIDD) and the wider Shannon Estuary to the national economy and Ireland's long term trade, industrial and renewable energy ambitions.

In its January 2024 response to the Review of National Ports Policy Issues Paper, Limerick Chamber set out a broad and interconnected series of policy priorities. Central to that submission was the need to recognise ports not simply as freight handling facilities, but as essential national infrastructure, economic development assets and energy nodes. The Chamber emphasised that future ports policy must address climate adaptation and resilience, the decarbonisation of maritime transport, the provision of shore power and alternative fuel infrastructure, the development of green shipping corridors and the role of ports in facilitating offshore renewable energy and associated industrial activity.

The Chamber's submission placed particular emphasis on the opportunity presented by Atlantic offshore renewable energy and the potential of Shannon Foynes Port to act as a large scale staging, assembly and marshalling location. It called for a clear timeline for the development of a West Coast an enduring offshore renewable energy procurement pipeline and an investment framework that would prioritise port projects by reference to their physical and strategic characteristics. These characteristics include access to deep water, extensive wet storage, proximity to the offshore resource, available development land, grid connectivity and existing road, rail and industrial infrastructure.

The original submission also highlighted the importance of developing a genuinely integrated logistics network. It advocated for the restoration and enhancement of rail freight connectivity to Foynes, completion of the Limerick Foynes road, greater coordination between port, road, rail and grid investment and a wider national policy objective of reducing overdependence on Dublin and the East Coast. The Chamber argued that future trade growth and supply chain resilience should be supported by maximising the capacity of existing port assets, including the substantial expansion potential available at Shannon Foynes, rather than allowing established traffic patterns to determine the location of all future investment.

A further central theme of the Chamber's submission was that the historic port funding model would not be sufficient to deliver the scale of infrastructure required for offshore renewable energy, climate adaptation and future trade capacity. The Chamber therefore sought a more active role for Government, NewERA, the Ireland Strategic Investment Fund and other public bodies in developing investable funding structures. Our submission argued that strategically important projects must be assessed on their wider economic, regional, energy security and climate benefits, and not solely on whether they can generate a positive commercial return during the early stages of development.

Limerick Chamber welcomes the considerable degree of alignment between a number of these recommendations and the Draft National Ports Policy. The reaffirmation of Shannon Foynes Port as a Port of National Significance is particularly important, as is the recognition that the Ports of National Significance must lead the delivery of future national capacity and offshore renewable energy infrastructure. The Chamber also welcomes the continued recognition of Shannon Foynes as a TEN T core network port, which reinforces its national and European strategic importance.

The Chamber further welcomes the draft policy's support for maximising and expanding existing port assets, its requirement for port masterplans to be reviewed and its recognition that failing to invest in capacity, equipment and hinterland connectivity would pose a serious risk to the national economy. These provisions broadly align with the Chamber's position that Ireland should make full use of existing nationally significant infrastructure, including the deep water capacity and development potential of the Shannon Estuary.

There is also welcome alignment in relation to climate adaptation, alternative fuels, onshore power supply, green shipping corridors, rail freight, circular economy practices, maritime skills, accessibility and cybersecurity. Similarly, the recognition of the Foynes–Limerick freight line and the policy support for increasing rail freight represent important progress towards a more sustainable and diversified national logistics network.

The Chamber also welcomes the important change in principle whereby Government retains the option to invest in the capital infrastructure of Ports of National Significance and may consider cross governmental Exchequer funding or borrowing streams where investment supports Government policy. This represents a significant departure from the previous position that port companies should not rely on State support and reflects the Chamber's argument that ports are now being required to deliver objectives extending considerably beyond their traditional commercial functions.

Notwithstanding these areas of progress, the Chamber considers that further work is required before the final policy can provide a sufficiently clear and credible framework for regional port development and, in particular, for the full development of Shannon Foynes Port and the Shannon Estuary. The draft does not provide a timeline for a West Coast DMAP, a defined Atlantic offshore renewable energy auction pipeline or sufficient alignment between energy procurement, grid development, port investment and industrial policy. Without clarity in these areas, ports will continue to face considerable difficulty in making commercially responsible investment decisions for infrastructure that must be delivered well in advance of offshore wind deployment.

The draft also stops short of identifying Shannon Foynes as a strategic national hub for floating offshore wind assembly, staging, wet storage, manufacturing, operations and maintenance, green fuels and associated supply chain development for the west coast. Although the policy recognises that Shannon Foynes may play a role in future western offshore renewable energy development, it is presented as one of a number of possible facilities and is not supported by a transparent investment prioritisation framework based on deep water, available land, wet storage, resource proximity, transport connectivity and energy network access.

The Chamber is also concerned that the policy's strongest and most explicit geographical commitment in relation to post 2040 trade capacity is the requirement to masterplan significant additional capacity on the East Coast. While the draft refers to balanced regional development and the growth of all commercial State ports, this East Coast specific objective risks reinforcing the historic concentration of port traffic, investment and supporting infrastructure around Dublin and the eastern seaboard. It could also pre empt a more objective assessment of the contribution that Shannon Foynes and other existing ports could make to meeting future national capacity requirements.

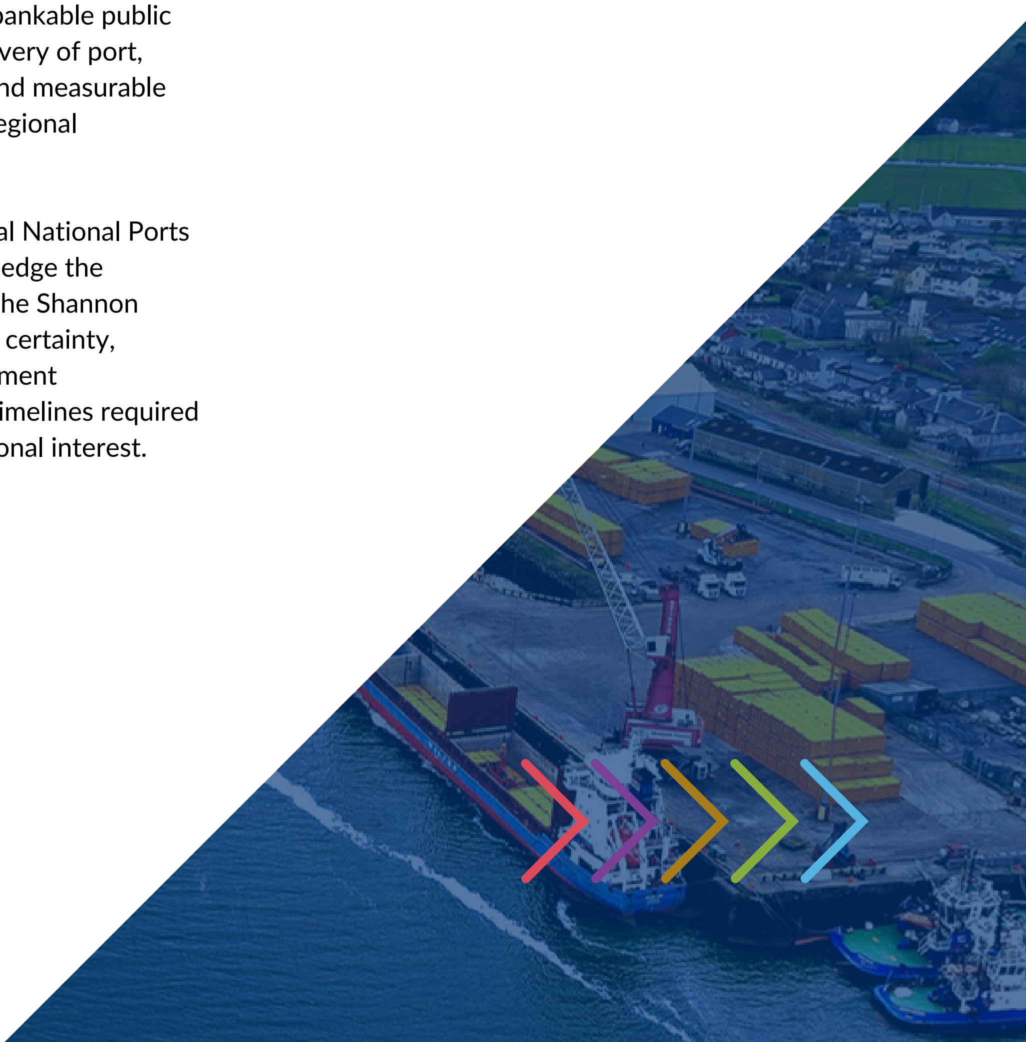
Further clarification is also required on funding. While the option of State investment is welcome, the draft continues to state that there are no proposals for direct Departmental funding and that port companies should remain financially self sufficient. This creates uncertainty for major projects that have a strong national economic, climate or regional development case but cannot demonstrate secure commercial revenues until offshore renewable energy auctions, grid connections and developer commitments are in place.

While Limerick Chamber supports the IMDO becoming a standalone entity, there is the requirement to ensure adequate governance and skills as well as regional board representation at board level.

Limerick Chamber's submission to this consultation therefore seeks to build on the positive direction established in the draft while addressing the remaining policy and delivery gaps.

In particular, the Chamber's submissions advocates for a dedicated Atlantic offshore renewable energy and port development framework; formal recognition of Shannon Foynes as strategic national infrastructure for offshore renewable energy and future trade capacity; a clear and bankable public funding pathway; coordinated delivery of port, road, rail and grid infrastructure; and measurable policy commitments to balanced regional development.

The Chamber believes that the final National Ports Policy must do more than acknowledge the potential of Shannon Foynes and the Shannon Estuary. It must provide the policy certainty, infrastructure coordination, investment mechanisms and implementation timelines required to realise that potential in the national interest.



Outstanding Issues & Recommended Amendments

Supporting Regional Route Development and Maritime Promotion

The Chamber urges caution with any potential reshaping of the Irish Maritime Development Office (IMDO). Any reshaping must ensure not to create an additional layer of red tape.

The final Ports Policy, with respect to the reshaping of the IMDO, should be informed by a wider public consultation process whereby there would be a transparent examination of the case for change, the necessity of the proposed reshaping, and the benefits (or costs) that may arise from a revised entity, supporting a well informed, evidence based decision that also reflects budgetary realities.

The draft policy is not explicit enough when it comes to the rationale for such a change or how the restructure would fit in with national promotion and route development in supporting a more balanced distribution of maritime services.

The draft policy is also not explicit enough in terms of Governance for a new standalone IMDO.

Infrastructure alone will not necessarily result in new shipping services. Shipping lines and cargo owners require detailed evidence of market demand, operating conditions, inland transport costs and potential customer volumes. Regional ports may require structured support to prepare route business cases and engage with international operators.

The Chamber's original submission identified promotion and marketing as important tools for increasing the visibility of Irish ports and distributing maritime services more evenly across the network.

Recommendations

- Enter into a public consultation for the reshaping of the IMDO providing a rationale for such a change that is communicated clearly with the potential benefits and costs provided to ensure an informed evidence based restructure.
- Furthermore, there needs to be greater clarity on the governance of the new standalone IMDO potentially seeing an independent board of directors with the required skills and experience that matches the IMDO remit while also ensuring that ports have representation on the board by reserving a seat for each of the ports or a regional representative.

Establishing a West Coast Renewable Energy Pathway

Limerick Chamber welcomes the Draft National Ports Policy's recognition that commercial ports will be essential to the construction, deployment and maintenance of offshore renewable energy infrastructure. The draft also recognises that a multiport approach can generate employment, supply chain and enterprise benefits at both national and regional level.

However, the draft does not provide the policy certainty required to support investment in large scale Atlantic offshore renewable energy infrastructure. The Chamber's original submission identified the absence of a West Coast Designated Maritime Area Plan as one of the principal obstacles to investment in Shannon Foynes Port and the wider Shannon Estuary. The submission called for a definitive DMAP timetable and a sufficiently substantial and enduring offshore renewable energy procurement programme to support long term port investment.

The Draft Policy records that the South Coast DMAP was approved in October 2024 and that a further National DMAP is being developed. It does not, however, specify when that process will be completed, which Atlantic areas will be prioritised, when projects in those areas will enter the procurement system or the volume of offshore renewable energy expected to be delivered from the West Coast.

This lack of certainty presents a fundamental investment problem. Port infrastructure must be planned, consented, financed and constructed several years before offshore renewable energy projects enter the construction phase. Port companies cannot make commercially responsible investment decisions without reasonable certainty regarding the scale, location and timing of future offshore development.

The absence of a defined Atlantic procurement pipeline may also place Ireland at a competitive disadvantage. Other jurisdictions are progressing offshore wind port infrastructure, supply chain facilities and industrial clusters in advance of full project deployment. Delayed decisions in Ireland could result in domestic projects relying on overseas marshalling facilities, thereby reducing the proportion of economic value and employment retained within the State.

The Chamber's original submission proposed an enduring West Coast development programme capable of supporting an annual build out of at least 500 MW over the long term. The final policy should recognise that a consistent and predictable deployment pipeline will be required if major port infrastructure is to remain commercially viable and capable of supporting offshore wind development at scale.

Recommendations

The final policy should

- Provide a clear timetable for the completion and implementation plan of the National or West Coast DMAP process
- Aligne the DMAP process with a multiannual offshore renewable energy auction schedule
- Identify the anticipated scale and sequencing of Atlantic offshore renewable energy development
- Help to coordinat port infrastructure requirements with electricity grid, hydrogen, industrial and skills policy
- Provide sufficient visibility of the development pipeline to allow ports and private investors to make long term investment decisions

Updating the Offshore Renewable Energy Policy Statement

Limerick Chamber is concerned that the Draft Policy restates the Department of Transport's December 2021 Policy Statement on the Facilitation of Offshore Renewable Energy by Commercial Ports without sufficiently updating its underlying assumptions.

The restated statement reflects the offshore renewable energy policy environment that existed in 2021. It places substantial emphasis on fixed bottom development off the East and South East coasts and anticipates that significant Atlantic development will occur at a later stage. It also relies on auction structures, grid assumptions and development phases that have subsequently evolved.

While the statement recognises the medium and long term potential of floating offshore wind off the South West and West coasts, it does not provide a contemporary delivery framework for that opportunity.

The offshore renewable energy policy environment has developed substantially since 2021. The planning system has moved toward a DMAP led approach, offshore wind costs and financing conditions have changed, and the scale of infrastructure required to support floating offshore wind has become clearer. The work of the Shannon Estuary Economic Taskforce has also provided a more developed regional and national vision for the Shannon Estuary.

A restatement of the 2021 policy risks preserving outdated assumptions at the heart of a new National Ports Policy that is intended to guide investment for several decades.

The revised strategy should be regularly reviewed so that port policy remains aligned with evolving offshore renewable energy targets, technology and market conditions.

Recommendation

Limerick Chamber recommends that the annex be replaced with an updated Offshore Renewable Energy Ports Strategy. This strategy should:

- Reflect the current DMAP and plan led development system
- Distinguish between the infrastructure requirements of fixed and floating offshore wind
- Identify the expected roles of construction, deployment, wet storage and operations and maintenance ports
- Assess contemporary investment costs and funding requirements
- Incorporate the recommendations of the Shannon Estuary Economic Taskforce
- Establish a delivery pathway for Atlantic offshore renewable energy

Formal Recognition of Shannon Foynes as a strategic Atlantic Offshore Renewable Energy Hub

The Draft Policy acknowledges that Shannon Foynes Port can play a significant role in providing large scale infrastructure for offshore renewable energy development in deeper waters off the South West and West coasts. This recognition is welcome.

Nevertheless, the draft presents Shannon Foynes as one possible facility among several rather than identifying the port as a strategic national platform for Atlantic / West Coast offshore renewable energy. This does not adequately reflect the port's particular characteristics or the scale of the opportunity identified for the Shannon Estuary.

In its original submission, Limerick Chamber argued that investment decisions should be based on the physical and strategic attributes required to support offshore renewable energy at scale. These include deep water access, extensive wet storage, proximity to the offshore resource, available development land, grid connectivity and existing road, rail and industrial infrastructure.

Shannon Foynes possesses a combination of these characteristics that is of national significance. The sheltered deep waters of the Shannon Estuary, available land, existing industrial activity, rail connectivity and proximity to the Atlantic resource create the potential for a substantial integrated offshore renewable energy and green industry cluster.

The Chamber is not proposing that Shannon Foynes should operate in isolation or that the State should abandon a multiport model. A multiport approach will remain necessary because construction, deployment, operations and maintenance activities have differing infrastructure and locational requirements. However, a multiport approach should not prevent Government from identifying ports with the unique characteristics required to perform specific national functions.

Limerick Chamber recommends that the final policy establish transparent criteria for prioritising offshore renewable energy port investment. These criteria should include water depth, navigational access, wet storage potential, land availability, proximity to development zones, transport connectivity, grid and energy network access, planning readiness and capacity to support industrial clustering. Applying such criteria would allow investment decisions to be made objectively while recognising the particular strategic value of Shannon Foynes.

Recommendations

The Shannon Estuary should not be viewed solely as a location from which offshore wind components may be handled. It has the potential to support a broader industrial ecosystem encompassing:

- Turbine assembly and integration;
- Construction staging and deployment;
- Wet storage;
- Operations and maintenance;
- Component manufacturing;
- Supply chain and logistics services;
- Green hydrogen, ammonia and other renewable fuels;
- Energy intensive industries seeking access to renewable electricity.

The final policy should therefore formally identify Shannon Foynes as a strategic national hub for the development of Atlantic and floating offshore renewable energy. Such recognition would provide a clear signal to energy developers, infrastructure investors, manufacturers and international supply chain companies.

Recognising Foynes Island Deepwater Development as Nationally Strategic Enabling Infrastructure

Limerick Chamber believes the final National Ports Policy should explicitly recognise Foynes Island Deepwater Development as nationally strategic enabling infrastructure. Shannon Foynes Port is already recognised as a Port of National Significance and a TEN T Core Network Port, and Foynes Island represents a critical opportunity to add deep water, rail connected capacity to Ireland's national port system.

The project should not be viewed solely as a commercial port expansion. It has wider national relevance because it can support additional freight capacity, offshore renewable energy assembly and deployment, larger vessel accommodation, supply chain resilience and the development of the Shannon Estuary as an Atlantic energy and industrial platform. The project will provide deep water terminal capacity, multi purpose freight capability, offshore renewable energy marshalling and assembly facilities, and additional national freight capacity.

For Limerick Chamber, the strategic value of Foynes Island lies in its ability to serve multiple national objectives at once. Infrastructure developed for offshore renewable energy can also strengthen trade capacity, diversify freight flows, support regional industrial development and improve national resilience. This would complement, rather than displace, the role of other Ports of National Significance.

The final policy should therefore assess Foynes Island Deepwater Development by reference to its full public policy value, including trade resilience, climate action, energy security, regional employment, offshore renewable energy delivery and balanced regional development. Its appraisal should not be limited to the direct financial return available to the port company in the early stages of delivery, particularly where future revenues depend on offshore renewable energy auctions, grid delivery, DMAP sequencing and developer commitments.

Recommendation

The final National Ports Policy should recognise Foynes Island Deepwater Development as nationally strategic enabling infrastructure for additional deep water port capacity, offshore renewable energy, rail connected logistics, supply chain resilience, energy security and balanced regional development. The project should be assessed by reference to its wider economic, climate, trade and regional value, and delivered in coordination with the supporting road, rail, grid, utility and land use infrastructure required to unlock the strategic potential of Shannon Foynes Port and the Shannon Estuary.

Recognising Shannon Foynes' Contribution to National Trade Capacity

The Draft Policy records the conclusion of the Irish Ports Capacity Study that planned developments should provide sufficient capacity until approximately 2040, provided that the necessary investments are delivered on time. It also recognises that failure to invest in port infrastructure, equipment and hinterland connectivity would create serious risks for the national economy.

Limerick Chamber supports the policy's immediate emphasis on maximising the use and expansion of existing assets. This broadly reflects the Chamber's earlier recommendation that the State should make greater use of existing port infrastructure before committing to a wholly new port.

The Chamber's original submission specifically highlighted the expansion potential of Shannon Foynes, including the proposed deep water development at Foynes Island. It argued that this development could add significant capacity to the national supply chain at a location with road and rail connections and without the same urban congestion constraints experienced by a number of other ports.

The Draft Policy does not expressly identify Foynes Island or assess the contribution it could make to future national capacity.

The final National Ports Policy should require the post 2040 capacity assessment to examine the full development potential of Shannon Foynes before a decision is made to prioritise major new East Coast infrastructure. This assessment should consider both trade and energy related capacity.

Shannon Foynes' future role should not be confined to bulk cargo or offshore renewable energy. The development of additional deep water capacity could strengthen national trade resilience, provide options for cargo diversification and reduce the risk associated with excessive concentration at a small number of gateways.

The final National Ports Policy should require the post 2040 capacity assessment to examine the full development and existing capacity potential of all ports before a decision is made to prioritise major new East Coast infrastructure. This assessment should consider both trade and energy related capacity.

Recommendation

The final policy should expressly recognise that infrastructure developed for offshore renewable energy may also contribute to general cargo and trade capacity. The policy also needs to ensure that existing and development capacity of all existing ports is analysed and taken advantage of prior to a commitment to prioritise major new East Coast Infrastructure.

Ensuring that Capacity Policy Supports Balanced Regional Development

Limerick Chamber welcomes the Draft Policy's repeated references to balanced regional development and the role of ports in supporting regional growth. The recognition of regional ports as facilitators of local economies and the reaffirmation of Shannon Foynes as a Port of National Significance are positive.

However, these general statements are not adequately reflected in the operative capacity provisions.

Policy Objective 6 requires the immediate maximisation and expansion of existing port assets, which the Chamber supports. It then provides that the port network will require master planning for significant additional post 2040 capacity on the East Coast.

This explicit geographical commitment risks predetermining the location of future national investment before the full capacity of Shannon Foynes and other existing ports has been objectively assessed. It may also reinforce the historic concentration of port activity and supporting transport investment on the eastern seaboard.

In its original submission, the Chamber identified a perceived East Coast and Dublin centric approach as a barrier to the development of a more sustainable and resilient national logistics system. It argued that National Ports Policy should actively support Project Ireland 2040's objective of developing the economic potential of regions outside Dublin.

Balanced regional development cannot be achieved solely through narrative recognition. It requires the location of infrastructure, services and investment to be considered as part of policy design.

Limerick Chamber recommends that Policy Objective 6 should be amended so that future capacity is planned through a location neutral, evidence based national assessment. This assessment should first determine how the expansion of existing Ports of National Significance, including Shannon Foynes, can meet forecast demand.

A commitment to a new or substantially expanded East Coast facility should arise only where it is demonstrated that existing ports cannot provide the required capacity in an economically, environmentally and operationally sustainable manner.

The Chamber also recommends that the actions and timelines appendix include measurable regional development indicators. These should report on the regional distribution of State owned port investment, additional capacity, new maritime services, port related employment and supply chain activity.

Recommendation

The final policy should require capacity decisions to consider:

- Regional economic development
- National supply chain resilience
- Available deep water and land capacity
- Road and rail congestion
- Freight related emissions
- Geographical distribution of population and industry
- Port development costs
- The potential to diversify trade away from a single dominant gateway

Developing a State Funding Framework

Limerick Chamber welcomes the significant change in principle contained in the Draft Policy whereby Government retains the option to invest in the capital infrastructure of Ports of National Significance. The recognition that Exchequer or cross government borrowing streams may be considered where investment supports Government policy is an important development.

However, the language remains discretionary and does not create a reliable or bankable funding pathway. The draft states that there are no proposals for the Department of Transport to fund State owned commercial port companies directly and that ports must continue to remain financially self sufficient.

This position does not fully address the market failure identified in the Chamber's original submission. Large scale offshore renewable energy port infrastructure may have an exceptionally strong national economic, regional development, climate and energy security case while having a weak or uncertain commercial business case during its early development stages.

The uncertainty arises because the eventual revenues depend on factors outside the control of the port company, including:

- DMAP designation
- Auction timing and volumes
- Developer investment decisions
- Planning and consenting outcomes
- Grid availability
- Technology selection
- And the wider offshore renewable energy supply chain

A port may therefore be required to incur considerable planning, engineering and enabling infrastructure expenditure years before it can enter binding commercial agreements with offshore wind developers.

The Chamber's original submission argued that Irish ports do not have the balance sheet capacity to deliver the full scale of infrastructure required and that CEF funding alone cannot close the investment gap. It sought collaboration involving Government, NewERA, the Ireland Strategic Investment Fund and other public and private funding bodies.

Recommendation

The final National Ports Policy should establish a dedicated strategic port infrastructure funding framework. This should include mechanisms such as:

- Direct capital contributions for clearly defined public policy elements of projects
- State backed or State supported borrowing
- Government guarantees for early stage infrastructure
- ISIF, NewERA and European Investment Bank participation
- CEF matching finance
- public private partnership structures
- and long term funding arrangements linked to future infrastructure availability or capacity

Alignment with the Critical Infrastructure Act

Limerick Chamber welcomes the enactment of the Critical Infrastructure Act and believes that the final National Ports Policy should be more closely aligned with its objectives. The Draft National Ports Policy rightly recognises that ports are essential national infrastructure and that Ports of National Significance will be required to support Ireland's future trade capacity, offshore renewable energy ambitions, energy security, climate transition and supply chain resilience. However, the policy should go further by clearly linking nationally strategic port developments with the delivery mechanisms available under the Critical Infrastructure Act.

For the Mid West, this issue is particularly important. Shannon Foynes Port and the wider Shannon Estuary sit at the intersection of deep water port capacity, offshore renewable energy, industrial development, rail connectivity, national freight resilience and future energy infrastructure. Major port projects in this context are not simply commercial investments by an individual port company. They are enabling infrastructure for wider national policy objectives, including decarbonisation, regional economic development, energy security and the diversification of Ireland's international trade gateways.

The Chamber considers that the final policy should recognise strategic port projects as candidates for Critical Infrastructure designation where they demonstrate a clear contribution to national objectives. This would not remove the need for robust planning, environmental assessment or financial appraisal. Rather, it would provide a more coherent policy basis for prioritising, coordinating and delivering infrastructure that is essential to the State's long term economic and energy resilience.

The need for such alignment is reinforced by the long lead in time associated with major port infrastructure. Projects of national scale must progress through masterplanning, environmental assessment, consenting, funding, procurement and construction well in advance of the demand they are intended to serve. In the case of offshore renewable energy and future national port capacity, delays in enabling infrastructure could constrain Ireland's ability to meet climate, energy and trade objectives. A stronger connection between National Ports Policy and the Critical Infrastructure Act would help ensure that strategic port investments are considered within the same national delivery framework as other essential infrastructure

This is especially relevant where supporting infrastructure outside the direct control of the port company is required. Strategic port development depends on the timely delivery of road, rail, grid, utility, land use and energy network infrastructure. The final National Ports Policy should therefore use the Critical Infrastructure framework to strengthen cross government coordination and ensure that the dependencies associated with nationally important port projects are identified, sequenced and progressed on aligned timelines.

Limerick Chamber recommends that the final National Ports Policy include a specific policy commitment to recognising strategic port developments as potential Critical Infrastructure Projects where they support national objectives relating to trade capacity, offshore renewable energy, energy security, climate action, supply chain resilience and balanced regional development. This would provide greater certainty to port companies, investors, infrastructure providers and regional stakeholders, while strengthening the State's ability to deliver the port capacity required for Ireland's future economy.

Recommendation

The final National Ports Policy should recognise that strategic port developments of national significance may qualify for consideration under the Critical Infrastructure Act where they make a substantial contribution to national objectives, including trade capacity, offshore renewable energy, energy security, climate action, supply chain resilience and balanced regional development. The policy should also require Government departments and relevant agencies to coordinate the delivery of associated road, rail, grid, utility and land use infrastructure so that nationally important port projects can be delivered within clear and aligned implementation timelines.

Coordinating Port, Road, Rail, Grid and Energy Infrastructure

Limerick Chamber strongly welcomes the Draft Policy's support for rail freight and its recognition of the rehabilitation of the Foynes to Limerick line. The commitment to support actions in the All Island Strategic Rail Review provides an important policy foundation for increased rail use.

However, the successful development of Shannon Foynes cannot be achieved through port or rail investment in isolation.

A major expansion of trade, offshore renewable energy or industrial activity in the Shannon Estuary will require coordinated investment in:

- Port infrastructure;
- The Foynes–Limerick rail line;
- The Limerick–Foynes road;
- Multimodal freight and logistic terminals;
- Electricity grid capacity;
- Water and utility services;
- And potentially hydrogen, biogas or other energy networks.

The Chamber's original submission emphasised the need for greater coordination between the bodies responsible for roads, rail, access infrastructure and grid transmission. It also stressed that supporting infrastructure must be planned early because port projects have long planning and construction timelines.

The Draft Policy does not provide an integrated mechanism for coordinating these investments. A port company may have a credible masterplan but remain unable to proceed because a road, rail, grid or utility project is not funded or delivered on a compatible timeline.

For the Mid West. this should bring together Shannon Foynes Port Company, the Department of Transport, the Department responsible for energy, Transport Infrastructure Ireland, Iarnród Éireann, EirGrid, ESB Networks, relevant local authorities and other infrastructure providers.

Recommendation

Limerick Chamber recommends that the final policy require a cross departmental enabling infrastructure plan for each major strategic port development

Reforming Planning, Consenting and Environmental Preparation

Port development takes place in environmentally sensitive coastal and estuarine locations and must continue to meet the highest standards of environmental protection. Limerick Chamber supports appropriate assessment and relevant safeguards.

However, environmental protection and timely infrastructure delivery should not be viewed as mutually exclusive. Better planning, data collection and institutional coordination can improve both environmental outcomes and the quality of development applications.

The Chamber's original submission identified several barriers to strategic port development, including:

- Insufficient recognition of port requirements within national, regional and local plans;
- Inadequate long term zoning for port expansion;
- Limited coordination between infrastructure providers;
- Insufficient baseline environmental survey data;
- Lengthy planning and consent processes;
- And uncertainty regarding funding and delivery.

The Draft Policy describes the new maritime planning system and the functions of the Maritime Area Regulatory Authority, An Coimisiún Pleanála and coastal planning authorities. It does not, however, establish specific measures to ensure that nationally strategic port projects move through the system in a coordinated and timely manner.

A shared environmental data programme could reduce duplication, strengthen the evidence base for decision making and allow potential impacts to be identified and mitigated earlier.

The final policy should also provide clearer guidance on how strategic port infrastructure contributing to national energy, climate and trade objectives is to be considered within the planning hierarchy, including where questions of imperative reasons of overriding public interest arise.

Recommendation

Limerick Chamber recommends that the final policy provide for:

- Early and coordinated pre application engagement between ports and all relevant consenting bodies
- Appropriate resourcing of MARA, An Coimisiún Pleanála and other competent authorities
- Clear target timelines for decisions on strategic port infrastructure
- Long term zoning and protection of land required for port expansion
- Integration of port masterplans into the National Planning Framework, Regional Spatial and Economic Strategies and county development plans
- And coordinated collection of baseline marine, ecological and environmental data

Environment, Biodiversity and Strategic Infrastructure Delivery

Limerick Chamber supports environmental protection, biodiversity safeguards and the application of appropriate assessment within the planning system. Ports operating in coastal and estuarine environments must continue to meet environmental standards, particularly where development interacts with sensitive habitats and designated areas.

However, the final National Ports Policy should also recognise that strategic port infrastructure can be essential to the delivery of national climate, energy and economic objectives. Infrastructure such as Foynes Island Deepwater Development is not only required for future port capacity, but also for offshore renewable energy deployment, supply chain resilience, energy security and the transition to a lower carbon economy.

Environmental protection and infrastructure delivery should not be treated as opposing objectives. The planning system already provides mechanisms to identify, assess, avoid, mitigate and, where necessary, compensate for environmental impacts. The policy should therefore promote a balanced approach that protects biodiversity while also enabling timely delivery of infrastructure that is demonstrably in the national interest.

For nationally significant port projects, the final policy should give greater recognition to the wider public benefits that such projects can deliver, including reduced emissions, renewable energy deployment, lower dependence on imported fossil fuels, regional employment, trade resilience and balanced regional development. These wider benefits should be considered clearly within planning, appraisal and policy decision making.

Limerick Chamber recommends that the final National Ports Policy provide clearer guidance on how strategic port infrastructure contributing to climate action, offshore renewable energy, energy security and trade resilience should be considered within the planning and environmental assessment framework, including where questions of overriding public interest arise.

Recommendation

The final National Ports Policy should confirm that biodiversity protection and the delivery of nationally strategic port infrastructure are both essential public policy objectives. Environmental assessment processes should continue to ensure a high level of protection, while also enabling the timely delivery of port projects that make a demonstrable contribution to climate action, offshore renewable energy, energy security, trade resilience and balanced regional development.

Designing Performance Measures that Recognise Strategic and Regional Value

Limerick Chamber welcomes the proposal to introduce a national port performance measurement system. Better information can support capacity planning, investment decisions and public accountability.

The Draft Policy states that the performance system will take account of the characteristics of individual ports. This qualification is essential.

A performance system based predominantly on current throughput, profitability or utilisation could unintentionally reinforce existing traffic concentration. Established ports with high volumes would appear more productive, while ports maintaining spare capacity for resilience or investing ahead of future offshore renewable energy demand could appear underutilised.

The performance system should therefore recognise the distinct functions performed by individual ports.

Recommendation

In the case of Shannon Foynes, relevant measures should include:

- Strategic deep water capacity;
- Available land and wet storage capability;
- Readiness to support offshore renewable energy;
- Contribution to regional employment and gross value added;
- Freight transferred from road to rail;
- Supply chain resilience;
- Energy and industrial clustering;
- Emissions reduction;
- And the capacity to accommodate diverted or emergency traffic.

The Chamber also reiterates its call for better collection of detailed logistics data, including cargo origins, final destinations and inland freight movements. The original submission noted that limited data on logistics and traffic flows makes it more difficult to demonstrate the potential for routing cargo through ports outside Dublin.

The final policy should commit to developing a national port community system or equivalent data platform capable of supporting evidence based freight and infrastructure planning. The data should be made available in an appropriately aggregated form to policymakers, regional bodies and port stakeholders.

Developing the Shannon Estuary Cruise Opportunity

Limerick Chamber welcomes the Draft Policy's commitment to assess the environmental and economic impacts of cruise shipping in Irish waters. The requirement for an evidence based assessment is appropriate given both the potential economic benefits and the environmental impacts associated with cruise activity.

The Chamber's original submission referred specifically to the Shannon Estuary Economic Taskforce recommendation that the potential for the Shannon Estuary to operate as a start and finish location for international cruise services should be examined. This proposition would link port facilities with Shannon Airport and the wider tourism economy of the Mid West and western region.

Recommendation

The national assessment proposed in the draft should explicitly include the Shannon Estuary home port opportunity. It should examine:

- Suitable berth and terminal requirements
- Navigational and operational feasibility
- Connectivity with Shannon Airport
- Passenger transport and tourism infrastructure
- Economic benefits for the wider region
- Environmental and community impacts
- And potential market demand from cruise operators

The assessment should not focus exclusively on the management of capacity constraints at existing cruise locations. It should also identify opportunities to broaden the geographical distribution of cruise related economic activity.

Aligning Dividend Policy with Strategic Investment

The Draft Policy states that profitable State owned port companies should pay dividends to the State and that significant special dividends may be expected where exceptional gains arise. It also provides that dividend policy should take account of capital investment plans.

Limerick Chamber supports appropriate financial discipline and shareholder oversight. However, dividend expectations must not undermine the ability of ports to finance nationally strategic infrastructure.

Major port projects require substantial expenditure before construction begins. Ports must fund master planning, engineering, environmental studies, planning applications, land preparation and matching contributions for European grants. Retained earnings are often an important source of this early stage capital.

Recommendation

The final policy should make clear that ports implementing an approved strategic masterplan may retain a greater proportion of earnings where those funds are committed to nationally important infrastructure. Dividend decisions should consider the scale and timing of the port's capital programme, the need to match EU funding and the wider economic benefits of the proposed investment.

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