



Western Development Commission (WDC) Submission to the Revision of the National Ports Policy

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Introduction

The Western Development Commission (WDC) is a statutory body with a remit to promote and encourage economic and social development in the Western Region (counties Donegal, Sligo, Leitrim, Mayo, Galway, Roscommon, and Clare). The WDC operates under the aegis of the Department of Rural and Community Development. We welcome the opportunity to make a brief submission on the draft Revision of the National Ports Policy (NPP).

The Western Region has a long coastline and significant coastal and marine assets providing access to a large area of Ireland's offshore resources. In order to ensure that we make the most of these, the WDC regards port and marine infrastructure as essential to underpinning the economic and social development of the Western Region. In this short submission we comment on the draft chapter by chapter and where the focus is on particular sections the numbers are included.

Comments on the draft Revision of the National Ports Policy (NPP)

The WDC remit relates to seven counties in the west and north west, most of which have extensive coastal and marine assets. The Port of Galway is the only state owned commercial port in the Western Region (WDC area) although Shannon Foynes is proximate as Clare is a part of the Western Region. Neither of these ports has RoRo or LoLo and both are serving particular bulk markets. Both have significant potential for serving the renewable energy industry especially as it develops off our western coast. Galway also has some passenger traffic on the Aran Islands ferry while Ros an Mhíl, a state Fisheries Harbour, provides the year round ferry connection to the Aran islands. Killybegs provides key port services including in relation to the deployment of onshore wind turbines. The draft Revision of the NPP only addresses the policy framework for state owned commercial ports but whether the Local Authority owned ports are included in all of the actions and policy objectives is not always clear. Furthermore, the revised policy does not cover the state Fisheries Harbours under the Department of Agriculture, Food and the Marine (e.g. Ros an Mhíl or Killybegs) which have an important role in the Region's port activities and which should be considered in the revised NPP.

1. Introduction

It would be helpful if there was a clearer explanation of why this is a Revision of the 2013 National Ports Policy rather than a new National Ports Policy. It seems that choosing to revise it, rather than develop a new policy, has limited the scope of this policy and we feel, makes it less effective in providing policy for the challenges and opportunities ahead. Since 2013 there have been significant changes in port activities and requirements (and indeed the types of investments being planned both in Ireland and elsewhere) and a new policy rather than a Revision could provide a more strategic vision for Irish ports in the next decades.

With the last ports policy published in 2013, it can be assumed that this ‘revision’ will cover the next 12-15 years. Therefore, a broader approach including more focus on new opportunities (such as Offshore Renewable Energy (ORE)) and challenges (such as maritime security) and their implications for port activity, with policy to address them, would have been welcome.

As we noted in [our previous submission](#) the data on capacity and port activity used is quite limited in scope and focuses mainly on tonnage rather than value. This fails to capture the importance of some of the services and port activities and the significant revenues associated with other ongoing activities, such as in relation to onshore wind deployment. Where the deployment and service of renewable energy infrastructure is part of Irish ports’ operations, tonnage alone is not an appropriate metric for measuring port activity. For example, Galway port has had significant activity in onshore wind turbine deployment which has become an important revenue source. With sizeable onshore wind targets to be met over the next decade this will continue to be an important activity for ports.

Furthermore, as suggested in [our 2024 submission on the review](#) a vision of how ports might look in for example 2050, in terms of operation, activities and port characteristics would be useful and could provide for a more future proofed strategy. This draft Revision of the NPP notes four megatrends which will impact ports and shipping operations. These are i) environmental; ii) technological; iii) geopolitical and iv) demographic. More detail as to how these trends will or could impact Irish ports and port activities, the policies to be put in place ‘to prepare for this changing trading and environmental reality’ (NPP, pg. 6), along with a more robust analysis of the implications of these trends for Irish ports and for ports policy, would be helpful.

We are particularly concerned that there should be a clear policy objective in relation to the development of port capacity to service the development of ORE. By 2040 there is expected to be very significant offshore generation, and port investment to service this industry, at all stages, needs to be planned now. Planning, funding and construction of such investment will take at least a decade. Without this the development of ORE will be delayed, and Ireland’s potential to make the most of the offshore wind resources will be restricted.

2. Organisational and Ownership Structures

While the Department for Transport has clear responsibility for transport systems and so ports fall under its remit, policy for ports needs to look more widely than the transport of people and goods (e.g. freight or equipment) and encompasses the broader role of ports in Ireland for the future. Many of the areas of port activity come under other departments: Department of Agriculture, Food and the Marine (which is responsible for the Fisheries harbours which are often involved in or have the potential to be involved in wider port activities); Department of Climate, Energy and the Environment (with responsibility for offshore (and onshore) renewable energy, which is likely to be a key area of activity for ports in the future); Department of Housing, Local Government and Heritage (which is responsible for the Local Authorities which own some of the ports); and Department of Defence (which is responsible for maritime security). A whole of government approach to the development of the draft Revision of the NPP could be made more evident, showing where these departments and their policies are involved in the relevant areas.

Likewise, although reference is made to the ‘Ports of Regional Significance’ which were transferred to Local Authority Ownership following the 2013 National Ports Policy, issues for these smaller ports, and their potential activities are not examined in the draft Revision of the NPP, and the focus appears mainly to be on the five ports referenced as ‘Ports of National Significance (NPP p11). While this categorisation is based largely on the tonnage of trade through the ports (small in regional ports compared to that in the five key ports) it does not take account of other activities and their potential for development in other

areas (e.g. renewable energy) or their potential strategic importance nationally (e.g. in relation to maritime security).

Ideally a National Ports Policy should address issues for all ports (including explicitly the issues, for the ports under Local Authority ownership) and should also cover the port activity elements of the 'Fishery Harbour Centres' such as Killybegs. This would ensure that the issues for all ports were considered and the inclusion of other ports and areas of harbours with port activity would mean new and longer term challenges could be addressed more comprehensively in a National Ports Policy.

3. Corporate Governance

3.5 Future Funding

We welcome the commitment in the draft Revision of the NPP that, given the multi faceted demands being made of state owned commercial port companies, the policy on exchequer funding for port investment will be modified. We are happy to see that the government now retains the option to invest in the capital infrastructure of Ports of National Significance under with the Minister for Transport or the Minister for Housing, Local Government and Heritage.

However, while draft indicates that the policy will be modified to allow exchequer funding, we are disappointed to see that there are no proposals or indications of how this might be operationalised to fund port investment at present. However, we welcome the clear indication in Policy Objective 3 that the government retains the option to invest in capital infrastructure.

We agree that the ports are operating as commercial companies, but there are a number of areas where the long term nature of the investment can make securing funding difficult or expensive or where the government has policy objectives that lie outside the ports' commercial activities. We believe it would be a useful Policy Objective for the Department of Transport to study, in detail, the various models for government funding of ports used throughout Europe in particular (recent examples of state and European funding for ports in France, Poland and Scotland could be useful starting points). A study examining the range of investments and types of funding which have been used elsewhere, and understanding how State Aid rules have been applied, or are deemed not to apply, in relation to various investments would be useful. We would like to see such a commitment on studying potential funding mechanisms and appropriate areas for government investment or support as an explicit Policy Objective in the Revision of the NPP.

4. Ports Policy and the Development of Maritime Transport

The focus of this chapter is on capacity for trade. This is of course a central activity of the commercial ports but looking to the future, ORE deployment and service is likely to become a key activity of many Irish ports, and lack of capacity in this area will limit the development of the ORE sector. Section 4.2.2 recognises the need to align with the Programme for Government objective of working with ports 'to support investments to facilitate offshore renewable energy development including constructing, maintaining and servicing renewable infrastructure with a regionally balanced approach.' We are disappointed that this chapter, and indeed later chapters in the draft Revision of the NPP, do not address this and do not include a strategy or an objective to develop a strategy to do this.

As noted above, in developing the draft Revision of the NPP, it would have been helpful to look ahead, in as far as possible, to what might be the characteristics and activities of ports in 2050. ORE has been mentioned and we have noted the importance of onshore wind. Changes in tourism and leisure activities may also be relevant for some ports, while maritime security is becoming increasingly important. There

may be other marine activities which are currently in very early stages. An effort to develop a vision and to future proof our idea of ports could aid in the development of new policies.

5. Future Sustainability

As noted further below some elements of this chapter would fit better in the chapter on Corporate Governance.

5.4 Alternative Fuels

Reference should be made to the definition of 'Alternative Fuels' being used in the draft Revision of the NPP. Given that many of the 'alternative fuels' are being used as a transition to fuels that don't emit GHGs, the draft Revision of the NPP could include a strategy to enable this further transition or a commitment to develop one.

In the context of a National Ports Policy the focus could be on: how these fuels are supplied to ports; and how the ships using the fuels are serviced by the ports; and the infrastructural investment required for these. Policy Objective 11 to lead on and support research into the feasibility of the development of alternative fuel infrastructure is welcome, but the focus could be broader than State owned commercial port companies as there is likely to be similar needs in the port activities of the fishery harbours

The WDC is involved in the GH2M project with partners including Donegal County Council, Vermillion Energy and Corrib Gas (Nephin Energy). The strategic importance of developing Killybegs Harbour and Galway Port as hubs for green hydrogen production is being considered in this project. By becoming early adopters and key purchasers of green hydrogen, both could play a pivotal role in establishing the West of Ireland as a leader in green hydrogen and sustainable energy, while driving investment, innovation and long-term economic growth across the region.

5.6 Onshore Power Supply (OPS)

We welcome the recognition that the adoption of OPS in Irish Ports will require access to adequate financing and funding mechanisms to support the substantial investments in the required infrastructure. It is mentioned that the Department of Transport will support the commercial State ports' applications for Connecting Europe Facility (CEF) funding for this. It should be remembered that the Port of Galway, a Ten T comprehensive network port, is also a commercial state port though owned by Galway City Council and so will also require such support (at times in the draft Revision of the NPP the descriptions of the port categories and terms used, and the focus of the policy are a little unclear).

5.7 Offshore Renewable Energy (ORE)

While the draft Revision of the NPP notes the shorter term ORE targets (to 2030) there are considerably larger longer term targets (including a commitment to deliver [20GW of offshore renewable energy by 2040, and 37GW by 2050](#)) for which the infrastructure needs to be planned.

The facilitation of ORE will be a key service for ports in Ireland in the future (as it already is in many ports in countries where the sector is further developed). It will provide significant opportunities for many of our ports but in order to take advantage of these, and indeed to facilitate the rapid expansion of the ORE industry, there needs to be clear strategic planning for the sector in Ireland and planning for ports role as part of ORE development. Facilitation of the ORE sector will require significant investment in port infrastructure, and it is likely that public funding, in some form, will be necessary for ports to make such investments.

Renewable energy deployment projects can earn very significant revenues above that coming from conventional cargoes. This needs to be better captured in metrics of port activity. This will become even

more important as the ORE sector develops with staging, storage and deployment along with O&M services operating from the ports. There is also significant potential for associated industry activity in or adjacent to ports (e.g. Hydrogen).

We had expected clear policy for the development of port activities in relation to ORE in this draft Revision of the National Ports Policy. Given its likely significance in coming decades this should be a key part of this Revision, developed in tandem with DCEE, the DAFM (Marine) and DETE and containing clear strategy and policy for ports in relation to ORE. It is disappointing that the draft policy only chooses to include the 2021 Policy Statement and does not provide a vision of the role for Irish ports or advance policy in this area. In addition, it would be useful to provide updated information on any funding provided under the CEF between 2021 and 2023 (as is outlined in the Policy Statement) to Irish ports for either studies or infrastructural work or indeed whether there has been any other funding or investment since.

As noted, by 2040 and on to 2050 there is expected to be very significant offshore generation capacity installed. Planning, funding and construction of investments to support this will take at least a decade. Port investment to service this industry at all stages needs to be planned now. Without this the development of ORE will be delayed and Ireland's potential to make the most of the offshore wind resources will be restricted. There should be a clear policy objective in relation to the development of port capacity to service the development of ORE.

Finally, although much of the focus of discussion is on offshore renewable energy, onshore wind will continue to be important with significant onshore capacity targets to be met over the next decade, so ports will continue to play a key role in the facilitation of onshore renewable development. Onshore deployment activities could also be recognised in any new ports policy, with the facilitation of the importation, storage and deployment of onshore turbine and turbine components a significant source of income for some ports and harbours.

5.8 Integrated Logistics

This section has a very narrow focus on rail freight. It is likely that development of ORE, along with other more traditional port activities, will require further development of integrated logistics although these may not necessarily fall under the remit of a National Ports Policy.

Rosslare Europort does have rail connection. This should be corrected (p 48).

5.9-5.12 All Sections

These sections would benefit from more robust analysis of the relevant sustainability, biodiversity and environmental impacts of ports so that appropriate policy can be developed or existing policy better implemented.

5.14 Port Security

The WDC welcomes the recognition of the increased importance of maritime security and the role of ports in this, as noted in the Department of Defence [National Maritime Security Strategy](#). It would be helpful, however, if the draft Revision of the NPP gave a clearer indication of how the Department of Transport (and government) envisage the role and potential requirements for ports in maritime security. Our Atlantic ports and harbours are key to Ireland's maritime security, especially as a number are points of arrival of key sub sea cables. Investment in facilities or security to support this role may be required and, if so, would be an addition to the commercial activities of the ports, and so should be facilitated through national policy. A policy objective relating on aspects of the National Maritime Security Strategy as they relate to ports would be helpful.

5.15 Gender balance and diversity

As this section appears to relate to employment in ports and the policy objective is for the State-Owned port companies to implement a Gender and Diversity Equality Action Plan, this section might sit better in the chapter on Corporate Governance. It would have been helpful to provide more rigorous analysis of the issues relating to gender equality and diversity in ports, and to include some data on patterns of employment by gender in this section. Such data should be available from the CSO (e.g. Census 2022 (and previous) employment by NACE 50 and 52).

5.16 Inclusion and Accessibility

Improving accessibility for people with disabilities and reduced mobility is essential. While accessible buildings and terminals are important, and recognised in the draft Revision of the NPP, it is also important to make sure that access through safe active travel (walking and cycling) within all ports is facilitated and recognised as a normal means of travel for those using port services, visitors and for employees to access their workplace. Such developments are clearly a necessary part of the modernisation of port infrastructure and should not be assumed to only be necessary where the ports have significant passenger traffic.

Conclusion

We welcome the opportunity to make a submission to the consultation on the on the draft Revision of the NPP. Some of our key points are restated below.

- The role of Irish ports is changing with opportunities beyond trade becoming increasingly important (for example in relation to ORE and maritime security). We would have liked to see greater vision for the future in the draft Revision of the NPP with a clear indication of what is envisaged for the future of Irish ports.
- While this Revision of the National Ports Policy focuses on State owned commercial ports, we believe that the policy should cover all port activities such as those taking place in the Fishery Harbour Centres (for example Killybegs and Ros an Mhíl both of which have significant non fishery activity).
- Ports are key regional infrastructure assets and are essential to the economic development of the region. The Revision of the National Ports Policy should emphasise this and recognise that western ports are strategic marine assets important to the regional economy and its development, for maritime security and for the development of the renewables sector, both on shore and offshore.
- In terms of the development of the Offshore Renewable Energy, the Revisions of the National Ports Policy should contain a clear strategy and policy for the development of ports to service this industry and a funding plan to allow ports to make the appropriate investments. Ireland has very significant targets for ORE by 2040 and 2050 and given the time taken for planning, funding and construction clear policy goals are needed to ensure that the appropriate ports infrastructure is in place in time.
- We welcome the modification of the previous National Ports Policy to allow for government investment in port infrastructure and developments to meet government objectives. We would have liked to see a clearer indication of how such funding might be applied and the appropriate mechanisms for doing so.

If you would like any more information or to discuss our submission further, please get in touch with me.

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