The Chartered Institute of Logistics and Transport Ireland

# Submission to Public Consultation

# Review of National Ports Policy

15th January 2024

## 1. Climate Change

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

Protecting ports is important, as they are strategic national infrastructure. Rising sea levels and an increasing number of severe storms have the potential to significantly challenge and damage port operations. An example of which was a recent severe adverse weather conditions impacting LoLo operations at Dublin port. This led to a lot of congestion, queuing to get into terminals and quays. Freight had to be brought back down the country as they couldn't get access. This added costs and reduced operational efficiency. It also had a knock-on effect across the spectrum. It led to road transport delays, impacting road freight schedules due to working time regulations. Hence, broader supply chain disruption.

A review of the threats to each port and the potential actions to protect and increase the resilience of our key import/export systems would be warranted. While financial assessments of potential measures are important, the implications for the whole economy are vast if their resilience to climate change is not increased. Barriers to improving port resilience to climate change may be more than financial in many cases, physical barriers may also be a key issue for many ports.

## 2. Development of Offshore Renewable Energy

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

There will be a need for significant infrastructure investment in ports, in particular port facilities to support offshore renewable energy, potentially from the exchequer. This should also be considered in light of the funding models which we refer to in the relevant section. An in-depth

financial and economic analysis is required. Potential opportunities for EU funding should be explored considering state aid rules. Engagement with the EU Commission on the development of new and revised funding instruments should be explored.

The 2020 Programme for Government committed to a target of 5GW of installed offshore wind capacity in Ireland's maritime area by 2030. Much of which will be developed along the east coast. Prioritisation should be given to supporting ports on the east coast. This would support and be consistent with the Republic of Ireland government policy for the rollout of renewable energy.

Consideration should also be given to assembling wind turbines in the Republic of Ireland. This would require a new terminal or new port, due to significant space demands and the ability to hold significant weight.

### 3. Integrated Logistics Chain

How can an integrated logistics policy between maritime transport and other transport and logistic modes be developed?

Integrated logistics has been a key focus, particularly rail freight to assist in cutting carbon emissions. Further developing logistics integration with rail freight would require additional analysis in terms of rail capacity but also in terms of financial/economic assessment.

There is limited infrastructure in ports to facilitate rail freight integration. The rail network would require huge investment with potentially limited benefit for freight containers due to shunting and trunking requirements. There would be a cost to reconnect lines and other developments. Investment would be required in raising bridges, signalling systems, and planning to avoid interfering with existing passenger services.

Other approaches beyond rail should also be explored, in particular coastal shipping. Benchmarking against international best practice should be undertaken, for example the Zero-Carbon Coastal Highway proposed by Maritime Research and Innovation UK.

As technology develops there is an expectation of container-terminal increased automation which would facilitate future logistics integration. A number of ports around the world are moving more to a purely automated port. Global ports such as Rotterdam and Singapore (Tuas Port) illustrate how automation technologies can potentially enhance operational efficiency, reduce costs, and facilitate logistics integration.

However, when assessing freight flow, anecdotal evidence suggests that most of the freights' destination or point of origin is in the region of the port. Therefore it may be difficult to convince and develop a case to use non-road freight transport as a key element of the chain.

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

Review the potential for financial support to encourage freight operators and forwarders to explore trial shifts from road to rail. This would allow for the development of case studies and increase the visibility of opportunities and encourage behavioural change.

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

## 4. Transition to the Circular Economy

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

The drive toward a circular economy can result in increased maintenance requirements. This maintenance is not only of port infrastructure but also of vessels. There should be an evaluation for the future potential of ship maintenance in Ireland, including the assessment of the development of dry docks to facilitate this. Also, purchasing electric port equipment with zero tail pipe emissions, such as cranes and vehicles.

## 5. Port Capacity

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

The data used as a base line for the advancement of the consultation document was outdated (2018). A new study should be undertaken so that decisions can be made based on up-to-date data. This should also include future trends, particularly as we move forward with decarbonisation and the potential reduction of oil-based products being imported. Also, consideration should be given to the CSO scenarios prediction of increased population in Ireland of between 17% to 41%.

As planning investment in infrastructure takes a considerable amount of time, we would urge for these reviews and additional research to be undertaken as soon as possible.

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?

CILT previously made a Port Capacity public consultation submission. The main points from our submission were:

As mentioned in the *Dublin Port Post 2040 Dialogue – Paper 2*[1], due to the port capacity limit, Dublin Port will reach its maximum throughput capacity projected between 2030 and 2040. Additional port capacity will be needed on the east coast of Ireland to cater for the growth.

We agree with the view that moving cargo handling activities in Dublin Port to a new port built on a greenfield site will be extremely challenging in terms of environmental impact and enormous investment (as in *Dublin Port Post 2040 Dialogue – Paper 7*[2]). Moreover, port expansion and development options are generally limited by geography and land-use restrictions among major European port cities.

However, in the absence of lack of interest and funding in alternative solutions such as suggested developing alternative ports, the idea of limited land reclamation could be considered post 2040. It's important the port infrastructure can react to changes in shipping volume, and service demand, especially in the post-Brexit era.

We are of the view that a study of freight flow for Ireland in the post-Brexit and decarbonisation era could be conducted to forecast the potential demand for shipping tonnage, international freight going in/out of Ireland. A special study is required in relation to this.

Routing Dublin Port traffic to other ports may impact emissions if it results in increased road freight journey lengths, but also there is the connectivity of certain ports that may not meet customers' needs. There should be an assessment of the overall carbon footprint impact of diverting freight traffic from Dublin if it reaches capacity.

A diversion of RoRo traffic to other ports may require incentivisation for ship operators and the ports. Consideration needs to be given to various factors that influence the flow of cargo. In achieving carbon reduction initiatives, government incentives may have to be considered.

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

The major population base is the Greater Dublin Area (GDA). The freight flows tend to stay regionally and therefore to avoid increasing road transport through travelling to other ports there should be a careful review of relocating the port or the feasibility of reclaiming land to expand the port.

[1] Dublin Port Post 2040 Dialogue – Paper 2: https://www.dublinportpost2040dialogue.ie/wp-content/uploads/2020/09/Paper-2-How-have-other-European-port-cities-developed.pdf

[2] Dublin Port Post 2040 Dialogue – Paper 7: https://www.dublinportpost2040dialogue.ie/wp-content/uploads/2020/09/Paper-7-Options-for-the-greenfield-development-of-additional-east-coast-port-capacity.pdf

## 6. Ports Funding

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

Current funding mechanisms of ports infrastructure should be reviewed. The potential for major amounts of investments may not be viable under the current port business models, particularly for non-Tier 1 ports. The current and future revenue streams of some ports may not be sufficient to cater for such large investments/debt on their balance sheets. The ability to raise funds may be challenging for some ports when considering their balance sheets. There may be a need to completely revisit the approach to port funding and business models. A new/appropriate public sector evaluation mechanism should be considered to evaluate the broader impact and benefits. Consideration needs to be given to the value and sustainability of the ports' long-term future.

## 7. Technological Innovation

How can Irish ports be best protected from cyberattacks?

The development of a cybersecurity regulator would aid in setting minimum national standard for critical national infrastructure such as ports. The EU Network and Information Systems (NIS) directive and the National Cyber Security Strategy will aid the implementation of minimum standards for cybersecurity to protect the affairs of Ireland.

Port systems need to be more integrated. State systems should consider developing an integrated portal, rather than needing to engage with 3 or 4 different agencies. Individual terminals tend to have their own system. An integrated system would speed up port operations, and ship turnaround times. This would dramatically improve efficiency in operations.

## 8. Governance

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

Considering the revenue stream that would be required for future investment, a review of the ports' governance structure is required.

## 9. Port Marine Code

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?

A Port Marine code could assist with health and safety in ports. A review should be undertaken that would include reflecting on best practice in developing a code. A substantial amount of flammable liquids are imported into Ireland. A review of The Oil Companies International

Marine Forum (OCIMF) may lead to some insightful code developments. Consideration should also be given to future energy needs such as hydrogen and bio-gas. These fuels can be volatile and consideration would also need to be given to the level of energy required to store them at the correct temperature.

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Chaggie is a Policy Researcher and an aspiring Ph.D. candidate with his research being focused on promoting circular economies amongst logistics firms from a value creation perspective. He holds an MSc degree in Business Management Strategy from Dublin City University. He also works for Sysco Ireland as an Operations Project Specialist driving operational excellence within the company.

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Tim is a member of the Institute's Council, Policy Committee, and is Chair of its Education and Training Committee. Former CEO of Bus Eireann and CILT in Ireland. Over forty-five years has held a range of senior management positions in transport and tourism and has lectured at third level. He holds BE, M.Eng.Sc. and MBA degrees and is a Fellow of the Institute.

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Joe has for the last three years been the CEO of the Chartered Institute of Logistics and Transport (CILT). Additionally, Joe has vast experience of a variety of transport and logistics organisations in different sectors, including UITP (International Association of Public Transport) and the European Logistics Association.