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Re: Public consultation on the draft revision of the National Ports Policy 2013

To whom it may concern:

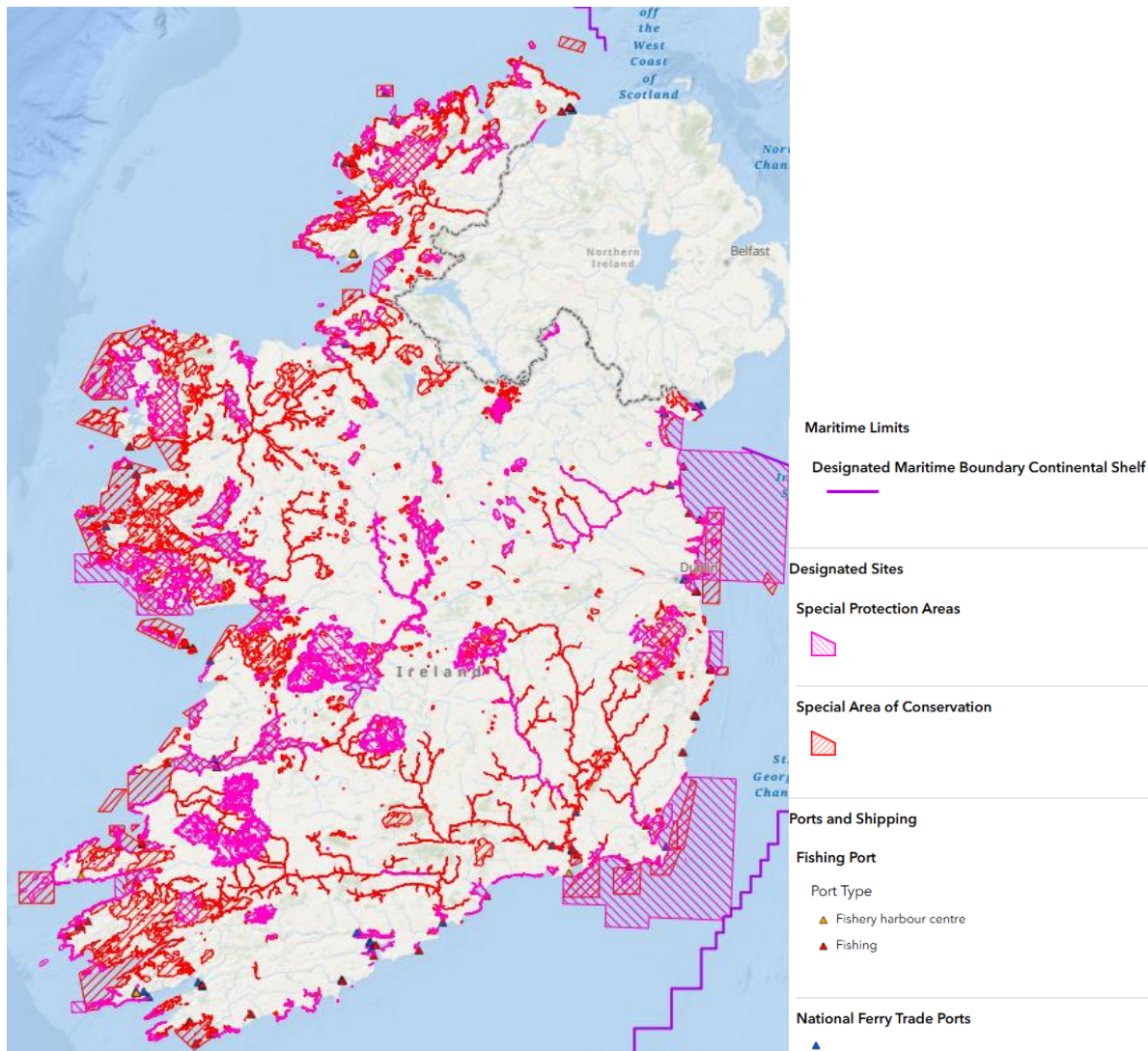
I am making this submission on behalf of the Sustainable Water Network (SWAN), an umbrella network of 26 of Ireland's leading environmental NGOs, national and regional, working together to protect and enhance Ireland's water environment. Through coordinating the work of the SWAN office with that of our members, SWAN seeks to influence water and water-related policy so as to secure maximum protection for Ireland's aquatic resources, through participation in the implementation of the Marine Strategy Framework Directive (MSFD), the Water Framework Directive (WFD) and other water-related policy and legislation. We are a founding partner of Fair Seas and a member of Seas at Risk and the Irish Sea Network.

SWAN welcomes the opportunity to respond to the Department of Transport's draft revision of the National Ports Policy 2013. The environmental NGOs in our network are the voice of the natural water environment in Ireland, which is the focus of our response to this consultation. Many of our members are also represented in the Irish Environmental Network (IEN) and we support the comments and recommendations made in their response to this consultation.

With all Irish ports located in estuaries or coastal zones, SWAN is committed to ensuring our requirements to keep these ecologically important areas in good status are achieved and maintained. The sections relevant to SWAN's work which we wish to comment on are included below.

The below map was created with Ireland's [Marine Atlas Map Viewer](#), and shows fishing ports, national ferry trade ports and Natura 2000 sites (the Special Protection Areas [SPAs])

and Special Areas of Conservation [SACs] designated through the EU's Birds and Habitats Directives). As visible on the map, most of Ireland's ports are located in or near designated sites. As such, the Ports Policy must recognise the indicators specific to environmental legislation (including the Water Framework Directive, Nature Restoration Law and Birds and Habitats Directives) designed to protect the water quality and biodiversity in these vulnerable and important ecosystems.



Source: Created with Marine Atlas on 11 August 2026 (SWAN)

Yours sincerely,

E. Armshaw

Emma Armshaw
SWAN Marine & Coastal Policy Officer

3.3 Port Company Boards

SWAN supports the inclusion of environmental representatives on port company boards. In addition to “members with appropriate accounting, legal, commercial and maritime/logistics training or experience,” Boards should include members with knowledge of environmental legislation objectives and expertise in how implications on biodiversity and water quality can be mitigated in port projects or development.

4.2 Future Capacity Requirements

We welcome the Policy’s support of “a transition to net zero carbon emissions in line with national Climate Action policy” and associated reduction in greenhouse gas emissions. However, while the Policy notes ports' role in the transition to net zero, it does not go into necessary detail of how this will be achieved, or how increased capacity will affect water quality.

The Policy assumes that Ireland’s existing ports will need increased capacity to accommodate future growth. However, this would require large-scale deep-channel long quay development, likely to have significant impact on the surrounding environment of the estuaries. Consideration must be taken of utilising nearby international ports for large offshore renewable energy (ORE) assembly needs. The existing Irish ports could then focus on servicing, with linked monitoring.

4.4 Cruise tourism capacity

The Policy acknowledges that cruises “generate a significant amount of waste and pollutants” and have a significant carbon footprint. The effect of this on water quality and MSFD and WFD indicators, as well as its impact on Natura 2000 site conservation objectives and sites for restoration under the NRL must be key in consideration of cruise berth capacity.

We are broadly supportive of Policy Objective 7 (*“The Department of Transport shall conduct an assessment of the environmental and port-related economic impact of cruise ships operating in Irish waters, in consultation with relevant stakeholders including the Department of Enterprise, Tourism and Employment, which has responsibility for tourism policy in Ireland”*), but call for this to specifically prioritise the needs of the environment and meeting of environmental requirements under legislation. The Department of Housing, Local Government and Heritage (DHLGH) and Department of Climate, Energy and the Environment (DCEE) must also be involved given their respective responsibilities for the WFD and MSFD.

5.1 Future Sustainability

As this section notes, all Irish ports are located in estuaries or coastal zones. Per the above map, many of these are in, or border, Natura 2000 sites, designated under the European Birds and Habitats Directives. Major works must be avoided in these vulnerable ecosystems, and must not contravene the conservation objectives of the European sites.

5.7 Offshore Renewable Energy (ORE)

While supporting the broader goal of tackling the climate crisis and using renewable energy sources to reach net-zero greenhouse gas emissions by 2050, SWAN emphasises the prioritisation of nature, with the needs of biodiversity at the centre of planning as ORE is developed.

SWAN's more detailed responses to the documents mentioned in the draft Policy are available online:

- [MPPS](#), August 2025
- [SC-DMAP](#), June 2024
- [ORE Future Framework](#), February 2024

5.11 Consideration of environmental impacts

The draft Policy correctly notes the air and water pollution which can be associated with ports and requires the “greening of port operations.” Plans must go into much greater specificity about exactly what monitoring and mitigation measures will be undertaken to reduce negative impacts on biodiversity and water quality.

Where research and data are lacking, the precautionary principle must be observed. If scientific uncertainty exists, or where impacts cannot be confidently avoided or mitigated, decisions must err on the side of protecting the marine environment rather than delaying action until damage has occurred. This principle, set out in Article 191 of the Treaty on the Functioning of the European Union, states “if it is possible that a given policy or action might cause harm to the public or the environment and if there is still no scientific agreement on the issue, the policy or action in question should not be carried out” ([EUR-Lex, 2025](#)).

5.11.1 Biodiversity

The draft Policy notes *“that appropriate assessment, pursuant to Article 6(3) of the EU Habitats Directive is integrated into the Irish Planning system, through which consent is sought for the development of ports,”* with a focus *“specifically on the species and/or the habitats for which the EU’s ‘Natura 2000’ site is designated.”* While important, an ecosystems-based approach should be taken, rather than just a features-specific approach. Additionally, this refers only to ports within the boundaries of SPAs and SACs, but port developments may also impact nearby protected sites, and the cumulative effects of multiple planned and existing projects must be taken into account

SWAN is supportive of the inclusion in the draft Policy: *“The development of additional infrastructure and enhanced operations at Irish ports should include biodiversity protection aspects in line with the EU Biodiversity Strategy given the sensitive areas within which these ports are located.”*

The Department of Transport must work closely with other departments and agencies to ensure environmental legislation is adhered to and conservation objectives met. These include:

- National Parks and Wildlife Service, which manages the SPAs and SACs. The Natura 2000 sites’ conservation objectives must be taken into consideration with the development and use of ports, including those of sites near to ports.
- DHLGH, responsible for ensuring Ireland meets Good Ecological Status under the Water Framework Directive.
- DCEE, whose Marine Division is responsible for the MSFD. Several indicators of the MSFD are likely to be impacted by port development, including:
 - 1. Biological diversity
 - 6. Sea floor integrity
 - 7. Alteration of hydrographical conditions
 - 8. Concentrations of contaminants
 - 10. Marine litter
 - 11. Underwater noise
- Nature Restoration Law (NRL). Ireland’s obligations under the NRL must be incorporated into port planning. Restoration tasks are legally binding, so the National Ports Policy must reflect planning to restore relevant habitats and species, some of which may overlap with intended port development. Analysis should be undertaken of where Irish ports could contribute to restoration, such as changes in dredging.

5.11.2 Water Quality

We are deeply concerned to see the “Water Quality” section of this policy contains just one sentence. *“Recognis[ing] the need for consideration of both mitigation and management of potential impacts during both operations and expansion in line with Water Action Plan 2024: A River Basin Management Plan for Ireland”* is not adequate and the final version of the National Ports Policy must go into significantly more detail on water quality. The requirement to meet Good Ecological Status under the Water Framework Directive must be central to the National Ports Policy.

5.11.4 Dredging

Similarly, it is equally concerning to see so little space devoted to the implications of dredging on biodiversity and water quality. Dredging can have significant impacts on estuaries, many of which are already in “poor” status in Ireland. Rather than just “recognizing the need for the environmental assessment and regulation of dredging operations,” the Policy must commit to monitoring and mitigation.