

# Environmental Pillar's MAREIRE Response to Public Consultation on the Draft National Ports Policy of July 2026

The Environmental Pillar's MAREIRE project welcomes the opportunity to contribute to the Government of Ireland's public consultation on the Draft National Ports Policy. The Environmental Pillar is a network of thirty-eight national NGOs working to promote sustainable development and environmental protection. MAREIRE, the "Marine Renewable Energy and the Irish Environment" Project, aims to advance and lead research, policy and advocacy in relation to marine biodiversity and offshore renewable energy (ORE), and to ensure that environmental protection remains at the forefront of decision-making, policy and planning whilst meeting our targets for renewable energy.

We recognise the important roles ports play in achieving offshore wind targets, as well as ensuring a just transition through the creation of jobs that can support the development of the ORE industry. With such significant investments projected in Europe and Ireland to enable these targets, it is crucial that the impacts on nature and biodiversity are considered carefully and early. Owing to their position at the intersection of different ocean industries, ports have the opportunity to drive a sustainable and equitable transition across the blue economy.

We note that a large portion of ports in Ireland are situated in Natura 2000 sites and that all are in ecologically important coastal and estuarine zones. We emphasize the importance of these sites and our commitment to ensuring their protection and restoration, which Ireland is obligated to do, including under the EU Nature Restoration Regulation. The restoration tasks and targets outlined in the regulation are legally binding. As such, a National Port Policy should reflect these obligations and consider plans to restore relevant habitats and species. A careful analysis of where our ports could contribute to restoration - e.g. changes in dredging regime - is needed.

Based on research currently *in press* and funded by the MAREIRE project (published on [www.mareire.ie/resources](http://www.mareire.ie/resources) at the time of submission of this response), we wish to issue the following general recommendations in response to the consultation:

- 1. Develop a strategic environmental framework for offshore wind port selection**

- Our research did not find any European country that has developed a model that genuinely minimises environmental impacts at source. Instead, most port



projects proceed through mitigation, compensation, and lengthy consenting processes. Still in the early stages of port planning and planning for the National Designated Maritime Area Plan (N-DMAP), Ireland has the opportunity to develop a national strategic framework which specifically addresses the environmental sustainability of port selection and expansion for ORE. This framework should move beyond the current trend of treating environmental issues as consenting risks and instead integrate ecological considerations into early-stage strategic planning and port selection. There are already existing frameworks in place to assess sustainable marine management approaches more broadly, that could serve as a starting point, such as that proposed by Elliott et al<sup>1</sup>.

Relatedly, we suggest changing the language on page 51, *Sub-section 5.11.1 Biodiversity*, to reflect the need to consider biodiversity early, at port and site selection stage.

E.g. “The development of additional infrastructure and enhanced operations at Irish ports should include biodiversity protection aspects **at early stages**, in line with the EU Biodiversity Strategy given the sensitive areas within which these ports are located.”

## 2. Prioritise alternatives to estuarine port expansion where possible

- Estuaries are highly sensitive and biologically rich ecosystems. Our report shows that generally, port developments elsewhere in Europe have faced prolonged disputes, redesigns, and compensation requirements where port expansion in estuaries has been proposed. Moreover, the findings of this report have cast doubt on the long-term sustainability of port expansion projects and dredging in estuaries. This warrants further consideration of whether alternative port options could fulfil the same function as those being proposed in estuarine ports. To that end, a transparent and publicly available comparison of alternative port options would be useful.

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<sup>1</sup> Elliott M. et al., “Making Sense of Marine Management – The Ten-Tenets Revisited,” *Marine Pollution Bulletin*, 2025.  
<https://www.sciencedirect.com/science/article/pii/S0025326X25010562>.



To that point, we are concerned that Section 5.11 (page 51) does not mention avoidance or reduction of environmental impacts at all, rather Sub-sections 5.11.2 *Water Quality* (page 52) and 5.11.3 *Air Quality* (page 53) only mention the need to consider mitigation and management. In line with the hierarchy of mitigation, we strongly recommend that appropriate siting and port selection with the aim of **avoiding and reducing** impacts is included in Section 5.11 and the policy as a whole. Port siting and selection, expansion and development must carefully consider and align with the mitigation hierarchy of avoidance, reduction, mitigation and compensation (in that order).

**We suggest the revised policy should encourage strategic planning processes, such as individual port strategies and master plans, to create more efficient and lower-risk pathways for biodiversity integration by embedding measurable biodiversity goals (no biodiversity net loss and biodiversity net gain) and properly implementing the mitigation hierarchy to create Nature-Positive Ports<sup>2</sup>.**

Additionally, we would like to highlight the existence of suitable nearby international ports which would be available to use for the purpose of main assembly in the ORE industry. Using these ports would provide major environmental (and industry timing) advantages by avoiding large scale deep channel long quay development in Ireland and its sensitive habitats. This would allow Ireland to concentrate on identifying its best possible servicing ports with linked environmental monitoring.

### 3. Strengthen transparency and public participation

- Given growing concerns regarding the use of acceleration measures and IROPI provisions under RED III, planning processes should ensure meaningful and transparent public participation. Communities should be engaged early in decision-making processes, particularly in coastal regions where multiple infrastructure projects may interact with existing livelihoods and environmental concerns, i.e., within communities located close to the South Coast DMAP (SC-DMAP), where both port expansion and offshore wind farms are being

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<sup>2</sup> Global Initiative for Nature, Grids and Renewables (GINGR), 2025. Integrating Nature into Offshore Wind Development: Stocktake and Recommendations. *White Paper*.  
[https://www.gingr.org/\\_files/ugd/0928d6\\_a579d6bfd274439fac7842b58ce11e28.pdf](https://www.gingr.org/_files/ugd/0928d6_a579d6bfd274439fac7842b58ce11e28.pdf)



proposed. If environmental concerns are addressed early on, this may reduce the risk of delays in the planning process.

Additionally, we suggest that Port Company boards, in addition to the members detailed in *Section 3.3 Port Company Boards* (page 20), should contain members with environmental expertise. We also recommend the creation of Community-Liaison roles to improve community and public consultation in decision making processes.

#### **4. Integrate cumulative impact assessments into multi-port planning**

- The Irish Government endorses a multi-port strategy in the context of ORE, which is in line with global trends, and makes sense given the capabilities of Irish ports. However, careful coordination will be required to avoid internal competition between ports and to avoid redundant expansions. Moreover, if concurrent port expansions are planned alongside proposed developments in the SC-DMAP sites and eventually the N-DMAPsites, the cumulative impacts of these activities should be assessed and carefully monitored.

To this point, we note the absence of mention or acknowledgment of the significant cumulative impacts caused by the development of ports at the intersection of multiple environments and ocean industries, or of the intention to avoid, reduce or mitigate for them. This should be remedied by the inclusion of cumulative environmental impacts in *Section 5.11 Consideration of environmental impacts* (page 50-51) and following sub-sections, and, importantly, by enshrining the necessity to assess, avoid, reduce, mitigate and monitor the cumulative effects of environmental impacts. It is also important to note that cumulative impacts can happen at project level (the impacts of one port and its activities) as well as at multi-project level (the impacts of multiple ports or multiple infrastructure projects). It is crucial to coordinate positive measures holistically, across multiple projects and industries to ensure the measures put in place to mitigate them are truly effective.

European experience demonstrates that environmental considerations have often entered too late in the process. It is crucial that policies such as the Draft National Ports Policy ensure that biodiversity protection, cumulative impact assessment, and alternatives appraisal are embedded at the earliest stages of port planning, particularly in the context of offshore wind development.

Environmental Pillar Members: An Taisce. Bat Conservation Ireland. BirdWatch Ireland. CELT (Centre for Environmental Living & Training). Cloughjordan EcoVillage. Coastwatch Ireland. Cultivate. Eco-Advocacy. ECO-UNESCO. Feasta (Foundation for the Economics of Sustainability). Friends of the Earth. GIY. Global Action Plan. Gluaiseacht. Good Energies Alliance Ireland. Green Economy Foundation. Green Foundation Ireland. Green Sod Ireland. Hedgerows Ireland. IPCC (Irish Peatlands Conservation Council). Irish Bee Conservation Project. Irish Cycling Campaign. Irish Seed Savers. Irish Whale and Dolphin Group. Irish Wildlife Trust. Leave No Trace Ireland. Rediscovery Centre. Sonairte. Streamscapes. Talamh Beo. The Environmental Forum. The Organic Centre. Vincent Wildlife Trust. VOICE Ireland. Wildlife Rehabilitation Ireland. Zero Waste Alliance Ireland.



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