

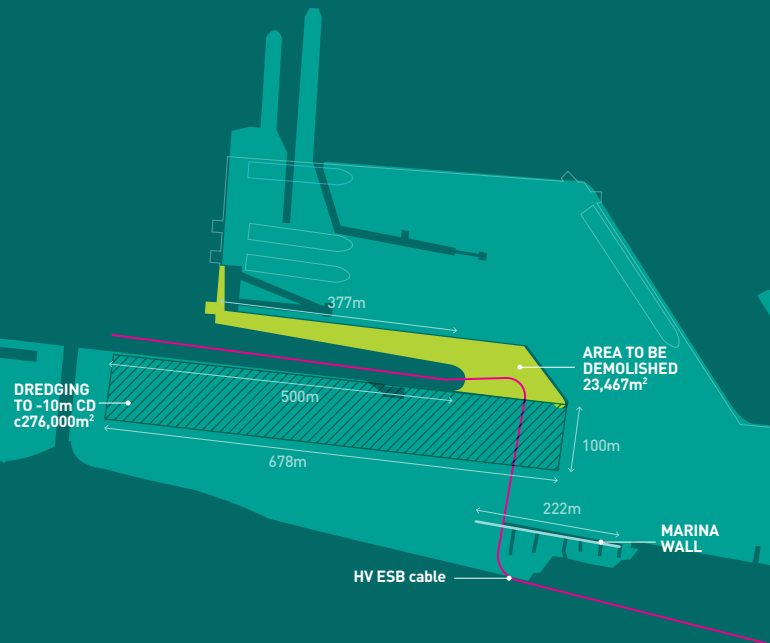
# Cruise Consultation Report

April 2020



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“DPC proposed in the Masterplan to develop new berths at North Wall Quay Extension (NWQE) suitable for cruise ships and this proposal was explicitly in support of the second Masterplan objective of re-integrating the Port with the City.”



Dublin Port Company (DPC) is developing Dublin Port in accordance with Masterplan 2040<sup>1</sup>.

The Masterplan has two objectives: firstly, to provide capacity to cater for growth in cargo volumes to 2040 and, secondly, to re-integrate Dublin Port with Dublin City.

DPC proposed in the Masterplan to develop new berths at North Wall Quay Extension (NWQE) suitable for cruise ships and this proposal was explicitly in support of the second Masterplan objective of re-integrating the Port with the City.

The proposed development is part of the Alexandra Basin Redevelopment (ABR) Project<sup>2</sup> and its construction cost is estimated at €108m.

Before committing to the development of the new berths at NWQE, DPC undertook a public consultation exercise from 22nd October 2019 to 17th January 2020<sup>3</sup>. The public consultation was informed by a discussion document<sup>4</sup> which was, in turn, supported by an economic cost benefit analysis study<sup>5</sup> and by research into the expenditure by cruise tourists in Dublin<sup>6</sup>.

1 [https://www.dublinport.ie/wp-content/uploads/2018/07/DPC\\_Masterplan\\_2040\\_Reviewed\\_2018.pdf](https://www.dublinport.ie/wp-content/uploads/2018/07/DPC_Masterplan_2040_Reviewed_2018.pdf)

2 Ten year planning permission granted by An Bord Pleanála on 8th July 2015 (PL29N.PA0034)

3 <https://www.dublinport.ie/public-consultation-opens-future-development-cruise-tourism-dublin-port/>

4 <https://www.dublinport.ie/wp-content/uploads/2019/10/DPC-Cruise-Consultation-.pdf>

5 <https://www.dublinport.ie/wp-content/uploads/2019/10/Indecon-Cost-Benefit-Analysis-Study-Report-16-09.2019-1.pdf>

6 <https://www.dublinport.ie/wp-content/uploads/2019/10/Failte-Ireland-Cruise-Ship-Passenger-Expenditure-Survey-16-06-2019-1.pdf>

## 1. Introduction

The public consultation sought answers to three questions:

1. Is there any evident appetite among cruise lines to make a major upfront investment in basic infrastructure in return for exclusive rights to operate it for a long period? Or, asked differently, is DPC likely to be able to transfer the risk of the €108m investment to the cruise lines?
2. If NWQE were built, could and would cruise lines commit to using shore power?
3. What is the attitude of Dublin Port's various stakeholders to DPC developing NWQE?

A total of 112 submissions were received with answers not only to these questions but also raising other issues.

This report analyses the viewpoints in the submissions, summarises the conclusions reached by the Board of DPC following its considerations of these viewpoints and, based on this, describes how the company will proceed in respect of the proposed development and, more widely, in terms of DPC's future involvement in cruise tourism.



The responses received fell into three categories as shown in Table 1.

**Table 1: Overview of submissions received**

Private individuals	68	61%
Public representatives	2	2%
Organisations	42	38%
<b>Totals</b>	<b>112</b>	<b>100%</b>

The tenor and content of the submissions received is described below for each of the three categories in turn. A list of the individuals and organisations who made submissions is attached as an Appendix.

### 2.1 Private Individuals

There was a variety of positions to the proposed development expressed among the 68 submissions received from private individuals as shown in Table 2.

**Table 2: Analysis of submissions from private individuals**

Opposed to the development	40	59%
In favour of the development	24	35%
Conditional support for the proposed development	4	6%
<b>Totals</b>	<b>68</b>	<b>100%</b>

#### 2.1.1 Opposed to the development

Many of the submissions opposing the development were lengthy and detailed and the opposition to the development was often strongly worded.

The submissions frequently cited reports critical of the environmental impact of cruise ships, notably *One Corporation to Pollute Them All - Luxury cruise air emissions in Europe* published by Transport & Environment in June 2019<sup>7</sup>.

Other submissions cited *People, Place and Policy - Growing Tourism to 2025* (published by the Department of Transport Tourism and Sport in March 2015<sup>8</sup>) saying that the proposed development runs counter to Government policy on sustainable tourism.

There were frequent references to the effects of overtourism in locations including Venice, Bruges, Dubrovnik and Barcelona where cruise passengers were said to have been likened to a *plague of locusts*.

“The submissions frequently cited reports critical of the environmental impact of cruise ships, notably *One Corporation to Pollute Them All - Luxury cruise air emissions in Europe* published by Transport & Environment in June 2019”

7 [https://www.transportenvironment.org/sites/te/files/publications/One%20Corporation%20to%20Pollute%20Them%20All\\_English.pdf](https://www.transportenvironment.org/sites/te/files/publications/One%20Corporation%20to%20Pollute%20Them%20All_English.pdf)

8 <https://assets.gov.ie/15792/8b462712683748e7bcec6c7d5c7ecd2a.pdf>

## 2. Response to Consultation

The negative responses from public representatives (see Section 2.2 below) were repeated by a number of respondents.

Two submissions referred back to DPC's thinking in 2011 as set out in *Dublin Cruise Traffic and Urban Regeneration Plan* (published by Dublin City Council in July 2011<sup>9, 10</sup>) and in DPC's Masterplan 2012-2040<sup>11</sup> (published in 2012) and noted that issues have emerged over the past eight years which suggest that DPC should change its earlier thinking.

Some submissions challenged the Indecon cost-benefit analysis study and said that it did not take account of risks that the projected growth might not be attained because the impacts of climate change were not adequately accounted for.

In many submissions the value of cruise tourist expenditure was challenged and one respondent suggested that the *proliferation of souvenir shops and low-price-and-quality-restaurants ... contribute to increasing rents and the disappearing of many local shops and activities as well as artisans' shops and authentic traditions.*

One submission suggested sending the cruise ships to Rosslare or Drogheda.

Another submission highlighted the financial and legal risk for DPC entering into a financial arrangement with a cruise operator in the event that DPC might subsequently be mandated to reduce emissions. This, it was stated, *could significantly impinge on Dublin Port's ability to deliver its primary role of freight and passengers.*

Finally, one submission queried whether the environmental impacts of the proposed construction works at NWQE had been assessed particularly as regards hydrological effects and the need for and the impact of increased dredging.

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### 2.1.2 In favour of the development

Of the 24 submissions in favour of the proposed development of NWQE, 13 objected strongly to DPC reducing the number of cruise ships calling to Dublin Port in terms such as the following:

- *The very notion of reducing cruise capacity is economic insanity*
- *Cruising needs to be expanded and not curtailed*
- *Gutted to hear Dublin Port is reducing cruise ship numbers*
- *Object to cutting down the number of cruise ships*
- *Asking Dublin Port not to suspend cruise ships*
- *Massive mistake to either reduce or stop cruise ship calls*
- *To reduce the number of cruise ships is nothing short of madness*
- *Disappointed to hear Dublin Port is stopping cruise ships*
- *Grave concern at the curtailment of cruise ships*
- *Strong objection to reducing berthing facilities for cruise ships*
- *Object to plans to dilute the cruise business in Dublin and in Ireland as a whole*

9 [https://urbact.eu/sites/default/files/import/Projects/CTUR/outputs\\_media/DUBLIN\\_LAP.pdf](https://urbact.eu/sites/default/files/import/Projects/CTUR/outputs_media/DUBLIN_LAP.pdf)

10 <http://www.dublincity.ie/dublin-city-council-plan-launched-board-luxury-liner-crown-princess-dublin-port>

11 [https://www.dublinport.ie/wp-content/uploads/2016/09/Dublin\\_Port\\_Masterplan.pdf](https://www.dublinport.ie/wp-content/uploads/2016/09/Dublin_Port_Masterplan.pdf)

“Two submissions commented on the benefit of investing in the new cruise facilities to offset the negative impact of Brexit.”

Most submissions simply stated support for the development without going into detail.

One submission suggested that container terminals and bulk cargo import facilities should be relocated away from Dublin to facilitate an increase in the number of cruise ships and also to make the port more attractive to all visitors perhaps with some additional housing, shopping and leisure facilities in the port area.

Another submission mentioned the possibility of moving freight ships to Greenore, Drogheda, Wicklow, Arklow or Belview.

Two submissions commented on the benefit of investing in the new cruise facilities to offset the negative impact of Brexit.

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### **2.1.3 Conditional support for the development**

One respondent said that they were inclined to support the proposed development but needed more information on environmental factors.

Another submission highlighted the importance of making shore power mandatory.

One submission pointed towards the potential to develop a new waterfront central business district on port lands with examples of signature tall buildings and other feature buildings such as a geodesic biodome.

Finally, one submission identified a number of things which need to be done to make Dublin a welcoming city for cruise tourists. These included:

- Infrastructure improvements for cruise tour buses to avoid city centre congestion
- Levying of a small landing tax on cruise tourists to fund these infrastructure improvements
- Use of water taxis or ship’s tenders instead of buses
- Better management of walking tours with a limit of 20 or so per tour

## 2. Response to Consultation

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### 2.2 Public Representatives

Two public representatives made detailed and lengthy submissions and both were adamantly opposed to the proposed development. Their submissions raised a range of issues including the following:

- Increased numbers of large cruise ships increase the risk of large fuel leaks and the fuel used by ships is particularly dirty.
- Cruise ships elsewhere have been fined for improper waste disposal and any breach of waste disposal protocols could decimate the marine environment in Dublin Bay.
- Given Dublin's increasing air quality issue from road traffic, *it would be foolhardy to facilitate the introduction of heavily polluting cruise ships into a city struggling with the issue.*
- Cruise visitors tend to visit comparatively few large tourist attractions and spend little in local shops and what they do spend money on is souvenirs.
- DPC had not adequately assessed the environmental and climate impact of the proposed development.
- DPC, Dublin City Council and Government should advocate at EU level for:
  - Zero emission berth standards
  - More stringent air pollution standards for cruise ships
  - Extension of sulphur emission control areas (SECAs) in European waters
- The disproportionate impact of cruise ships on air quality, habitats and climate need to be considered in the context of the climate and biodiversity emergency declared by the Oireachtas and by Dublin City Council.
- The mandatory use of shore power by cruise ships would be a positive step but the energy would need to be from sustainable sources.
- The trend towards using natural gas (CNG or LNG) instead of marine diesel and heavy fuel oil as a mitigant for carbon emissions and air pollution was rejected because of methane leakage in supply chains.
- Investment should be focused on local communities rather than on *transitory cruise ship occupants.*



## 2.3 Companies / Organisations

The 42 companies and organisations who made submissions fell into nine categories as shown in Table 3.

**Table 3: Categories of companies / organisations who made submissions**

1	Representative Bodies	11	10%
2	Coach Operators	8	7%
3	Retailers	6	5%
4	Public Bodies	5	5%
5	Tour Guides	4	4%
6	Port Operators	3	3%
7	Cruise Excursion Operators	2	2%
8	Cruise Lines	1	1%
9	Miscellaneous	2	2%
	<b>Totals</b>	<b>42</b>	<b>38%</b>

The main issues raised in each of these nine categories are summarised below in turn.

### 2.3.1 Representative Bodies

The largest number of submissions from companies and organisations came from representative bodies mostly, but not exclusively, in the tourism sector.

Nearly all submissions noted the positive economic impact of cruise tourism and many referenced the dependence other cruise destinations in Ireland (including Waterford, Galway, Belfast and Cork) have on Dublin.

Three submissions made similar recommendations as follows:

- DPC should proceed with the NWQE development and consolidate Dublin’s position as an international cruise destination.
- DPC should itself lead the development of a cruise management plan for Dublin.
- DPC should review existing proposals for the development of cruise facilities at Dublin Port to establish the most cost-effective and easily-realizable solution.

Some of these recommendations also featured elsewhere.

“Nearly all submissions noted the positive economic impact of cruise tourism and many referenced the dependence other cruise destinations in Ireland (including Waterford, Galway, Belfast and Cork) have on Dublin.”

## 2. Response to Consultation

Most submissions addressed environmental issues but in a variety of ways:

- The cruise industry is small and, therefore, its emissions are small by comparison to other sectors.
- The industry is well regulated and is compliant with international standards and regulations.
- One submission stated that cruise ships are more environmentally friendly than other types of ship and questioned why DPC does not have a *diktat* that all ships should use shore power.
- This submission also stated that 2,700 HGVs are responsible for more emissions, air quality issues and congestion than any cruise ship.
- DPC was criticised for raising environmental considerations, specifically air emissions, as this set the tone for the type of submissions which DPC would ultimately receive.
- There was support for cruise ships plugging in to shore power in Dublin as they do in Norway.

As regards over-tourism, a number of submissions noted the following:

- Cruise tourists are generally a very small proportion (3% to 5%) of all tourists.
- Dublin is not over-touristed and the city could comfortably accommodate an increase in tourist numbers from 6.3m (in 2018) to 10.0m. This was supported by noting that tourist bed-nights in Barcelona in 2018 were 19.3m and in Amsterdam were 16.9m.

One submission expressed concern that large scale hotels (of up to 600 beds) could have a negative impact on the economic sustainability of the hotel sector.

One submission criticised DPC for not engaging with the State or with the EU to get funding for the development of cruise berths and suggested that *the public and the tax payer have a right to presume that DPC will take decisions for the benefit of the State as a whole rather than for the port itself.*

Cruise ships having to share port space with cargo was queried in a number of submissions and, in two cases, it was suggested that cargo should be moved from Dublin Port to other ports such as Rosslare and Waterford.

One suggestion was made that port lands have a value of between €25 billion and €30 billion (equivalent to between €42m and €50m per acre) and the use of such valuable lands for cargo just 3.6km from O'Connell Bridge was questioned.

One submission quoted DPC's Masterplan and called on the company to honour its commitments to cruise tourism by building a modern tourist terminal and by promoting the Docklands as a hub for cruise tourists.

Finally, one submission identified a range of negative impacts by cruise tourism on city residents and stated that no expansion of cruise ship facilities should take place until transport and infrastructure were improved. Additionally, it was suggested that there should be a small landing tax per passenger to pay for this.

“Cruise ships having to share port space with cargo was queried in a number of submissions and, in two cases, it was suggested that cargo should be moved from Dublin Port to other ports such as Rosslare and Waterford.”

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### 2.3.2 Coach Operators

Seven coach operators made similar submissions in which they:

- Highlighted the economic benefits of cruise tourism and its future growth potential,
- Emphasised the role of Dublin Port as a marquee port in supporting the cruise business in other ports,
- Stated that Dublin needs dedicated cruise berthing and terminal facilities,
- Said that there is an opportunity for public / private partnerships to fund the necessary cruise infrastructure and
- Highlighted that cruise ship emissions are small in the context of overall shipping emissions and that the cruise industry is dedicated to improving its environmental impact.

Each of the seven coach operators made the same four recommendations:

1. Commit to the full implementation of the developments of new cruise facilities at Dublin Port.
2. Explore alternative approaches to finding the best solution to infrastructural and facility needs for cruise tourism at Dublin Port to ensure the best and most cost-effective approach.
3. DPC should take the lead in sourcing funding and managing stakeholders, and should present a solution-oriented approach and positive message to the international cruise industry.
4. Develop a multi-faceted and co-ordinated policy framework and cruise management plan for Dublin.

An eighth coach operator said that the benefit of the cruise industry was clear to him and that he would lose out if the number of cruise ships were to reduce.

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### 2.3.3 Retailers

One retailer highlighted the value of cruise tourism, asked that DPC's decision to reduce cruise ship numbers from next year be reversed and expressed strong support for the development of cruise tourism in Dublin.

Two similar submissions said that given that DPC had obtained planning permission for the new berths, it should seek financial support for the required investment from the State, from the EU, from the cruise industry or from any related institution. These submissions additionally suggested that Dublin Port's cargo capacity limitations should be addressed by using underutilised capacity at other ports on the island of Ireland.

One retailer suggested that the retail spend of tourists was much higher than shown in the Fáilte Ireland cruise passenger expenditure survey because it is unlikely that high net worth individuals making high value purchases were included in the survey.

One retailer in Donegal highlighted the spin off benefit for regional ports of cruise ships calling to Dublin and expressed strong support for the development of new berths for cruise ships in Dublin.

Two other retailers expressed concern at the impact on their businesses of any reduction in cruise ship activity in Dublin Port.

## 2. Response to Consultation

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### 2.3.4 Public Bodies

Three of the responses from public bodies:

- Recognised the economic benefit of cruise tourism.
- Highlighted the benefit of cruise tourism as a means of giving first-time visitors to Dublin a positive initial experience.
- Stressed the importance of sustainability and supported the use of shore power by cruise ships as a means of mitigating local air pollution.
- Noted the greater benefit of turnaround cruise business as a means of extending tourists stay in the city thereby increasing their expenditure.

One submission noted that Dublin City Council had expressed concern regarding the number of hotels in the city rather than voting to limit them (as had been stated in DPC's *Cruise Consultation Discussion Document*).

Two responses highlighted the inter-dependency between destinations (notably Dublin, Dun Laoghaire and Belfast) and one of these commented that if the NWQE development in Dublin did not proceed, that cruise volumes elsewhere would continue to grow but at a slower rate.

One response noted that Dun Laoghaire's cruise ship bookings had increased substantially (from six in 2019 to 22 in 2020 and to 42 in 2021) and that tender facilities in Dun Laoghaire Harbour are being relocated and enhanced to facilitate this business.

The situation regarding the proposed cruise development in Dun Laoghaire Harbour was clarified - Dun Laoghaire Rathdown County Council has withdrawn its planning application from An Bord Pleanála because of technical risks with the project and also because of funding risks due to cruise lines being unwilling to make contractual commitments.

Finally, one submission highlighted a number of public health issues including:

- Air pollution - The health effects of air pollution suggest the use of shore power should be an *absolute requirement*.
- Carbon emissions - Unspecified *knock-on effects on public health through numerous pathways*.
- Disease outbreaks – The potential strain on public health and healthcare services as a result of possible disease outbreaks on cruise ships.

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### 2.3.5 Tour Guides

One tour guide highlighted the modest scale of their business and welcomed the additional business which cruise ships bring given that hotel capacity is limited.

A second suggested that all non-tourism related port business be moved to the north of County Dublin.

Finally, a third submission said it would be a mistake to spend millions on new cruise facilities because cruise passengers spend as little as possible and because of the congestion large groups of cruise tourists cause in Dublin.

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“One operator suggested that cruise ships should use Dun Laoghaire rather than Dublin Port while another operator sought access to provide services to cruise ships at the new berths at NWQE.”

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### 2.3.6 Port Operators

Three port operators made submissions, each expressing a range of views.

Two submissions highlighted the health and safety challenges of accommodating cruise ships on berths and in areas of the port normally used for cargo handling operations.

Given the port’s limited capacity and against the background of a large growth in cargo volumes, the alternative use of NWQE to provide berths for cargo handling was suggested.

Given that berths for cruise ships are booked long in advance of their arrival, one submission highlighted that cargo ships can no longer rely on having access to a berth by virtue of being the first ship to arrive at the port. The impact of this on ship charter costs was highlighted. Against this background, the possible provision of dedicated cruise berths was welcomed.

One port operator supported DPC looking to the cruise industry to provide finance and another operator said that the financing of the cruise berths should not impact on port costs for cargo ships.

One port operator highlighted what DPC had said in its planning application for the ABR Project and said that DPC should commit to making the investment while, at the same time, criticising DPC for increasing its charges for cruise ships.

One operator suggested that cruise ships should use Dun Laoghaire rather than Dublin Port while another operator sought access to provide services to cruise ships at the new berths at NWQE.

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### 2.3.7 Cruise Excursion Operators

Both submissions noted the importance of the development of the cruise business in Dublin for the well-being of the entire cruise sector in Ireland including in locations such as Waterford, Cobh, the west coast and Belfast. In one case, this was emphasised by the example of Invergordon’s growth in cruise creating a gateway to the Scottish Highlands.

Each submission also emphasised the economic benefits of cruise tourism.

One submission said that Dublin should develop new cruise terminal facilities to meet consumer expectations and, beyond this, that the proposed NWQE solution and development cost should be revisited to identify less expensive alternatives.

DPC was encouraged to seek opportunities to partner with investors using public / private funding arrangements

One submission cited DPC’s briefing document to the Minister for Transport, Tourism and Sport<sup>12</sup> and said that it created a lack of clarity beyond 2021 and this, in turn, created doubt as to the welcome for cruise tourism in Dublin.

12 <https://www.dublinport.ie/briefing-document-minister-shane-ross-dublin-ports-new-cruise-ship-berthing-pricing-policy/>

## 2. Response to Consultation

“Each of the cruise excursion operators recognised the importance of environmental issues and one repeated observations made by other respondents elsewhere”

Each of the cruise excursion operators recognised the importance of environmental issues and one repeated observations made by other respondents elsewhere:

- The cruise industry is small and, therefore, its emissions are small by comparison to other sectors.
- The industry is well regulated and is compliant with international standards and regulations.
- There is a need for effective destination management to deal with the impact of demand peaks.
- The cruise sector is committed to broad sustainability goals that go much further than emissions and social congestion.

One of the cruise excursion operators made the same four recommendations as made by the seven coach operators (see Section 2.3.2). They additionally suggested incorporating the recommendations of the *Green Cruise Port – Action Plan 2030*<sup>13</sup> (prepared by Hamburg Port Consulting in 2019) into the co-ordinated cruise policy framework and cruise management plan for Dublin.

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### 2.3.8 Cruise Lines

One cruise line made a submission and made five points:

- The cruise industry continues to grow and there is a record number of new cruise ships due for delivery from ship yards over the next decade
- The cruise line is investing in the cleanest technologies available
- There is a proven market in Dublin for cruise turnarounds
- The cruise line would be interested in participating in a potential tender process to finance new cruise facilities in Dublin.
- Dublin needs dedicated cruise berths if it is to maximise its potential for cruise tourism.

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### 2.3.9 Miscellaneous

One organisation noted the potential for positive impacts for local communities from cruise:

- Social enterprises to service the needs of cruise passengers.
- Employment opportunities for local people in port construction projects and in cruise ship and associated industries.

A second organisation expressed dismay at what it saw as DPC’s decision to pull cruise business from Ireland and, against the background of the Indecon report, urged DPC to raise the necessary funding for the development of NWQE.

Both organisations supported the use by cruise ships of shore power to reduce air emissions.

<sup>13</sup> <http://www.greencruiseport.eu/Home.html>

From the analysis of the 112 submissions, seven main issues emerge and these are discussed in turn below.

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### 3.1 Masterplan objective for cruise and changes over the past eight years

Some submissions noted (and DPC agrees) that circumstances have changed considerably since DPC first proposed to develop NWQE to provide berths for large cruise ships.

DPC's thinking in 2012 was explicitly linked with that of Dublin City Council as set out in the *Cruise Traffic Urban Regeneration Local Action Plan* published by DCC in 2011. At that time, the country was still in deep recession and initiatives such as The Gathering were being promoted to try to generate tourism based economic growth. The development of Dublin's cruise business appeared to similarly provide an opportunity for economic growth from tourism.

As the economy recovered, tourism grew substantially. In 2011, there were 6.5m tourist visitors to Ireland with expenditure of €2.9 billion. By 2018, this had grown to 10.6m visitors with expenditure of €6.9 billion<sup>14</sup>.

However, important sustainability issues such as climate change and pollution (particularly air pollution) have come to prominence in the intervening years requiring reappraisal and reassessment of economic and commercial assumptions which had been orthodox for many decades.

Against this background, it would be unwise for DPC not to challenge its thinking of 2012 before progressing with a development as large and impactful as NWQE.

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### 3.2 DPC should review the existing proposals

A number of submissions, including submissions from commercial companies directly involved in cruise tourism, supported DPC reviewing the existing proposals for NWQE to establish the most cost-effective and easily-realizable solution to cater for the requirements of the cruise business.

<sup>14</sup> In the seven years from 2011 to 2018, tourism numbers grew by 63% and tourism expenditure by 137%. By comparison, cargo volumes through Dublin Port increased by 35% in the same period.

“DPC already has a prohibition in place on waste water discharges from open loop scrubbers in waters within the company’s jurisdiction.”

### 3. Issues

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#### 3.3 Environmental impacts of the proposed development

The *Cruise Consultation Discussion Document* raised the issue of air emissions from ships and many of the submissions received expressed concern at the contribution not only of cruise ships but of shipping generally to carbon emissions and also emissions of pollutants such as NO<sub>x</sub>.

In addition, a number of submissions raised concerns with other possible environmental impacts from shipping including possible fuel leaks, discharges of dirty water and discharges from scrubbers.

DPC already has a prohibition in place on waste water discharges from open loop scrubbers in waters within the company’s jurisdiction.

Beyond this, the company shares concerns of potential pollution from ships. In most cases, DPC relies on national and international regulations to prevent pollution. DPC also has comprehensive emergency plans in place to respond to emergency situations of various types including where marine pollution might occur.

At a policy level, DPC (through the European Sea Ports Organisation) supports the development of policies and regulations at the EU level which reduce the environmental impacts of shipping in the context of achieving the objectives of the European Green Deal in ports<sup>15</sup>. In particular, DPC would welcome the introduction of a binding zero berth emission standard which would apply Europe-wide if not world-wide. Unilateral action by a small port such as Dublin cannot change the behaviour of large international shipping lines.

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#### 3.4 Move cargo to other ports

Some submissions suggested that cargo should be moved from Dublin Port to other ports. (One submission even suggested that cruise ships should similarly be moved).

The idea of moving cargo from Dublin Port or even of relocating Dublin Port entirely to another location is a recurring suggestion. DPC does not believe that it would be economically viable or environmentally possible. Notwithstanding this, DPC will commence the *Dublin Port Post 2040 Dialogue* during 2020 to underpin the very long-term planning of Dublin Port post the Masterplan’s time horizon of 2040.

The development of major long-term port capacity at a location outside Dublin Port will take at least 20 years whether this capacity is intended to cater for just the growth after 2040 (by which stage DPC believes that Dublin Port will be at maximum throughput capacity) or whether it is to facilitate the relocation of all cargo handling activities plus growth thereafter.

As part of the *Dublin Port Post 2040 Dialogue*, DPC will publish detailed analysis of what would be involved in moving Dublin Port (location, design, environmental impacts and costings) and will invite submissions from interested parties.

Whatever the outcome from this dialogue, Dublin Port’s cargo volumes will almost certainly continue to grow over the next 20 years and this is the reality that DPC must deal with.

<sup>15</sup> [https://www.espo.be/media/ESPO%20Green%20Deal%20position%20paper%20Green%20Deal-FINAL\\_4.pdf](https://www.espo.be/media/ESPO%20Green%20Deal%20position%20paper%20Green%20Deal-FINAL_4.pdf)



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### 3.5 DPC should take a lead role in developing a cruise management plan

A number of submissions suggested that DPC should take a lead role in the development of a cruise management plan for Dublin extending into areas outside of the company's core responsibilities and competencies.

The Board of DPC decided in October 2018 that DPC should no longer be actively engaged in cruise marketing.

In a situation where DPC will have to address issues arising from the environmental impact of shipping generally and, given their enormous size, from cruise ships in particular, it would be inappropriate for the company to be involved in marketing and promoting a sector whose activities it will have to regulate within Dublin Port. DPC does not do this for any other shipping sector.

DPC facilitates a number of trades (notably the importation of petroleum) which are unsustainable and does so because there is an economic imperative<sup>16</sup>. DPC is agnostic as to the continuation of such trades in the long term and, to the extent that these trades diminish over time as national and international decarbonisation policies take effect, DPC will utilise the freed-up port capacity for whatever trade in goods remains.

Likewise, DPC will, in respect of the cruise sector, facilitate its continued operation and growth in Dublin Port and will do so within the constraints and limitations of international, national and local policies however they might evolve.

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### 3.6 DPC should seek funding from the State and from the EU

National Ports Policy from 2013 explicitly rules out exchequer funding for port infrastructure projects.

Expenditure for the construction of dedicated berths for cruise ships is explicitly excluded as in the EU's project funding criteria under the Connecting Europe Facility.

However, in 2014 DPC applied for EU grant aid for the ABR Project and was awarded €23m.

Notwithstanding some submissions suggesting that DPC should seek funding from the State or from the EU for the construction of dedicated cruise berths in Dublin Port, this is precluded by national and EU policy.

<sup>16</sup> Petroleum imports through Dublin Port (4.7m tonnes in 2019) constitute almost one-third of the country's total primary energy requirements (14.7m tonnes of oil equivalent in 2019).

“Providing capacity for cruise ships on multi-purpose cargo berths creates a particular challenge given that DPC has to commit to booking slots on particular days at specified times (often determined by tides) up to two years in advance.”

## 3. Issues

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### 3.7 Berth allocation

Providing capacity for cruise ships on multi-purpose cargo berths creates a particular challenge given that DPC has to commit to booking slots on particular days at specified times (often determined by tides) up to two years in advance.

The other demands for such berths from cargo ships vary in nature.

Some ships operate what are termed liner services (typically providing services to ports in Continental Europe) and operate to schedules which can change from time to time due to market demand considerations.

Other ships have randomly occurring demand patterns sometime determined by weather conditions in Ireland (as in the case of animal feed imports).

DPC’s challenge is to cater for all three different types of demand for the port’s multi-purpose berths and to do so in such a way as to maximise the company’s revenues and also cater for all types of demand to the greatest extent possible.

It is inevitable that DPC will at times disappoint some sectors of shipping by not being able to meet their requirements when and to the extent desired.

The implication of this is that DPC will continue to have to operate a cruise ship berthing policy to ensure that it does not over-commit future berth capacity at the expense of other sectors.

Based on the analysis of the 112 submissions and based on consideration of the seven key issues emerging from the public consultation, DPC has concluded as follows:

1. The original thinking in Masterplan 2012-2040 of using the development of berths at North Wall Quay Extension suitable for cruise ships as a means of reintegrating the Port with the City has been undermined over the past eight years.
2. Where DPC has consistently said that the cost of developing the berths at NWQE needed to be met by third parties, it is extremely doubtful if this objective can be achieved.
3. Moreover, even if it could, significant risk to DPC would remain after the development of the berths at NWQE had been completed.
4. While there is support from State and public bodies for the development of NWQE, the support is conditional notably as regards sustainability.
5. Whereas there is evident public support for the development, there is also strongly felt public opposition.
6. In these circumstances, to proceed with the development at NWQE could undermine the Masterplan objective of re-integrating Dublin Port with Dublin City and could instead serve as a source of divisiveness between the Port and the City and with the communities which Dublin Port supports.
7. Against the above background, DPC will not proceed with the development of NWQE as envisaged in Masterplan 2040 and as permitted under the ABR Project planning consents.
8. Instead, DPC will continue to provide capacity for cruise ships in Dublin Port at multi-purpose cargo berths.
9. While works are progressing to redevelop Alexandra Quay West as part of the ABR Project over the period from 2021 to 2023, DPC will limit the annual number of cruise bookings to about 80 over the three years of construction as previously advised in March 2019. Thereafter, DPC will maximise the availability of multi-purpose berths to provide capacity to allow cruise volumes rebuild to their 2020 levels from 2024 onwards.
10. In the meantime, DPC will work with public bodies (notably DPC and EPA) to, firstly, develop a clear understanding of the contribution of ship emissions (including cruise ships) to air quality in Dublin and, secondly, to develop a policy and programme to reduce emissions at berth in line with developing policies at EU level.
11. DPC will not participate in cruise marketing and will instead leave it to the many private sector companies with a commercial mandate to grow their tourism businesses and to the various public sector organisations with a remit to grow cruise tourism. It is clear from the number of responses to the public consultation that there is no shortage of such bodies.
12. DPC will limit its role in cruise tourism to facilitating it to the greatest extent possible by providing berth capacity subject to the constraint of maintaining capacity availability on multi-purpose berths for all sources of demand. DPC will do this with the objective of maximising revenues to support the company's long-term capital programme. This approach is in line with Masterplan 2040's objective of providing port capacity for future cargo growth.
13. Finally, instead of developing NWQE to provide berths for cruise ships, DPC will review alternative options to develop NWQE so as to support Masterplan 2040's second objective of re-integrating the Port with the City.

## Appendix - Respondents

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### Private individuals (68)

Teresa Barbosa	Gemma Fee	Liz Morgan
Sarah Barragry	Stephen Ferguson	Daragh Murphy
Brian Boyle	Rory Fogarty	Una Ni Bhroithe
Josef Brezina	Ciara Franck	Annette O'Connor
JoAnne Carey	Andrew Furlong	Martin O'Donoghue
M Carroll	Caroline Furlong	Mary O'Driscoll
Clive Carroll	Brian Gillespie	Jenny O'Leary
Dorothy Cashman	Lisa Goddard	Catherine O'Malley
Aileen Cashman	Paul Gorecki	Therese O'Reilly
Marion Cashman	Deirdre Gorman	John O'Sullivan
Carmen Cassin	Ann Marie Hayes	Niamh Puirseil
Evelyn Cleary	Owen Hughes	Kim Purdy
Shane Conneely	Stephen Hurley	Simon Rogers
Eric Conroy	Philip Hyland	Aidan Smith
Seamus Cullen	Derek Kelly	Lisa Smith
Donnacha Curley	Nigel Kenny	Mairéad Sweeney
Michael Dickson	Roger Lonergan	Adrienne Tasker
John Blake Dillon	Keith Magee	Owen White
Jonathan Dowling	Catherine Martin	Carmel White
Joan Doyle	Joe McGettigan	Alan Wolf
Harry Dunne	Philip McNally	
Hannah-Louise Dunne	Sinead Mercier	
Hilary Dunne	James Molloy	
Trish Fahey	Harry Molloy	

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### Public representatives (2)

Councillor Neasa Hourigan	Dublin City Council
Senator Alice Mary Higgins	Seanad Éireann

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## Companies / organisations (42)

Company / organisation	Name	Category
Association of Visitor Experiences & Attractions	Ruth Andrews	Representative body
Cobh Tourism CLG	Hendrick Verwey	Representative body
Cork Business Association	Philip Gillivan	Representative body
Cruise Europe	Michael McCathy	Representative body
Docklands Business Forum	Alan Robinson	Representative body
Dublin Town	Gerard Farrell	Representative body
Incoming Tour Operators Association Ireland	Ruth Andrews	Representative body
Irish Hotels Federation	Eoin Quinn	Representative body
Irish Tourism Industry Confederation	Eoghan O'Mara Walsh	Representative body
South Georgian Core Residents Association	Philip O'Callaghan	Representative body
The Coach Tourism and Transport Council of Ireland	Kevin Traynor	Representative body
Allied Coaches	Sinéad Nolan	Coach operator
Bartons Transport	Feargal Barton	Coach operator
Coolderry Coach Hire	Thomas Gernon	Coach operator
Foxhound Travel Ltd	Adrian Fox	Coach operator
JF Travel	Jim Dunne	Coach operator
Sillan Tours Ltd.	Brian Roe	Coach operator
Streamline Coaches	Kenny Brady	Coach operator
Ussher's Coaches	Barry Ussher	Coach operator
Brown Thomas & Arnotts Department Stores	AnnMarie Dillon	Retail
Carroll's Irish Gifts	Peter Hyland	Retail
Carroll's Property Group	Lorcán O'Connor	Retail
Taylors Three Rock	John Keenan	Retail
The Olde Castle Bar & Restaurant, Donegal	Seoirse O'Toole	Retail
Weir & Sons	Dave McCormick	Retail
Department of Public Health East HSE	Úna Nugent	Public body
Dublin City Council	John O'Hara	Public body
Dún Laoghaire Rathdown County Council	Therese Langan	Public body
Fáilte Ireland	Shane Dineen	Public body
Visit Belfast Welcome Centre	Mary Jo McCanny	Public body
Cassin Tours	Conrad Cassin	Tour guide
Cork/Kerry Regional Tour Guide & Driver	Angela Healey	Tour guide
	Mary McCarrick	Tour guide

**Appendix - Respondents**

<b>Company / organisation</b>	<b>Name</b>	<b>Category</b>
Dublin Tour Guide	Garvan Rushe	Tour guide
Doyle Shipping Group	Brian McCarthy	Port Operator
Hamilton Shipping	Leo McParland	Port Operator
R&H Hall	Matt Kerrigan	Port Operator
Excursions Ireland	Niamh McCarthy	Cruise excursion operator
Specialized Travel Services	Margaret Cronin	Cruise excursion operator
Royal Caribbean Cruises Ltd	Adam Sharp	Cruise line
St. Andrews Resource Centre	Jim Hargis	Miscellaneous
The Cruise Room - Ireland	Robbie O'Grady	Miscellaneous



