

**From:** [REDACTED]  
**To:** [post2040](#)  
**Subject:** Submission re. Dublin Port Post 2040 Dialogue  
**Date:** 30 June 2021 16:57:08  
**Attachments:** [CUFFE 2021.06 Dublin Port Post 2040 Dialogue.pdf](#)

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Dear Jerry,

My submission as part of the Dublin Port Post 2040 Dialogue is attached.

Warmest regards,

Ciarán

**Ciarán CUFFE**

MEP for Dublin

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30 June 2021

**Jerry GRANT**

Chairperson, Dublin Port Company  
Online to [post2040@dublinport.ie](mailto:post2040@dublinport.ie)  
Port Centre - Alexandra Road  
Dublin 1 - Ireland D01 H4C6

**Re. Dublin Port Post 2040 Dialogue**

Dear Mr. Grant,

I welcome the opportunity to make my views known on the Dublin Port Dialogue 2040. While I note that your dialogues focus on the strategic development of the Port in the long term, I have taken the liberty of focusing on some immediate detailed issues that the Port might take the lead on.

I am concerned that your conundrum of planning for long-term growth does not reflect the importance of living within a climate-constrained world. This requires careful assessment of the climate and biodiversity impacts of your plans at every stage. Such assessment goes beyond Appropriate Assessment and Environmental Impact Assessment Reports and requires a root and branch analysis of your organisation's role in addressing the climate and biodiversity crises. If the Government's Plans for a 51% reduction in the State's greenhouse gas emissions are to bear fruit over the coming decade this has significant impacts on your future strategies and planning.

1. In this regard you have not sufficiently engaged with the expansion of rail traffic to and from Dublin Port in your plans. I suggest that you consider planning for the loading and discharge of long trains on the Quays rather than the removal of direct rail traffic to and from the Port. The suggestion I recently received from your CEO to build a container rail freight hub at Irish Rail's rail head on East Wall Road would require two transshipments in the vicinity of the Port and would be commercially challenging. It would seem reasonable to increase rail freight from 1% to 10% of your throughput over the coming decade and reallocate lands accordingly.
2. Given the proximity of the Port to residential areas it may be prudent to reduce the transport of dangerous cargoes and hydrocarbons through the Port over time. There continue to be concerns over Seveso sites within the city boundaries. Climate action will contribute to achieving this over time, and other less urban ports may play a role.
3. Careful management of lease arrangements within the Port may allow for more efficient use of Port lands in the medium term.
4. Any move towards mandating ships to plug into electric shore-side supply, and the turning off of ship engines when alongside would be advised.
5. Greater consideration for foot passengers and those who travel by bike, taxi and public transport would be welcome. I have had to walk out of the Port on one occasion when no other transport option was available. The Port should take a lead role in ensuring that this does not have to occur. The Port should also take a lead in ensuring that foot passengers can be accommodated on all Ro-Ro services.
6. Greater provision of publicly accessible monitoring of air and noise would be useful.

I wish you well in your consideration of your proposals and look forward to continued engagement on these issues.

Sincerely,

**Ciarán Cuffe**

**Ciarán CUFFE**, MEP for Dublin