

APPENDIX 2
ROGAN ASSOCIATES LETTER OF SUPPORT



ROGAN ASSOCIATES
CONSULTING ENGINEERS - ARCHITECTS

Athens, September 14th 2026

To Whom It May Concern,

I write in support of the accompanying report (Assessment of infrastructure available for towage at Dublin Port, September 2026) which sets out a comprehensive assessment of towage provision and associated berthage arrangements within the jurisdiction of Dublin Port Company (DPC).

DPC has a statutory mandate to enable and facilitate international trade through the provision and operation of marine and landside infrastructure that is of critical importance to Ireland's national economy. Dublin Port operates within a uniquely constrained footprint and at exceptionally high levels of intensity, with throughput per hectare significantly exceeding that of comparable European ports. These operational pressures are further compounded by Dublin Port's marine environment, where up to 17,000 vessel movements per annum are safely managed within a narrow and highly regulated navigation channel.

The navigation channel at Dublin Port is designated as Critical National Infrastructure and carries the highest possible risk classification under the State's Critical National Infrastructure framework. This designation is supported by the National Risk Assessment Process and reflects both the volume and strategic importance of maritime traffic transiting the channel. Against this backdrop, the safe management of vessel movements, the protection of life, the safeguarding of the marine environment, and the continuity of port operations must remain overriding priorities in all operational and planning decisions.

The accompanying report demonstrates that towage services are a safety-critical component of these operations. The availability, positioning, and supporting infrastructure of tugs must be carefully controlled to ensure rapid response capability, safe maneuvering of large commercial vessels, and the avoidance of additional navigational or operational risk. The Harbour Master, exercising statutory

powers under the Harbours Acts, is responsible for directing shipping movements and ensuring that towage arrangements are both adequate, safe and appropriate to prevailing operational conditions.

The report provides a comprehensive assessment of all berths within Dublin Port's jurisdiction, examining each location against essential criteria including marine safety, interaction with manoeuvring vessels, shoreside access and egress, compliance with occupational health and safety requirements, availability on a continuous basis, and the provision of permanent utilities such as electrical power and water.

This assessment confirms that the overwhelming majority of berths within Dublin Port are either fully committed to commercial operations, subject to ISPS and terminal licensing constraints, or are operationally incompatible with safe and reliable towage use and tug berthing to appropriate berthing slots.

In this context, the Harbour Master's conclusion that Berths 18 and 50N provide the only suitable and sustainable bases for towage operations is coherent and addresses the overall needs of Dublin Port. These berths (Berths 18 and 50N) meet the combined requirements of marine safety, operational availability, secure access, and supporting infrastructure. The report further highlights that, at this time, alternative locations would either interfere with active RORO, LOLO, bulk solid or bulk liquid operations, or compromise vessel manoeuvring space within the navigation channel.

The report also recognizes the operational impacts of current and forthcoming infrastructure projects associated with Dublin Port's Masterplan, including MP2 and the 3FM project. The report details the increased towage infrastructure that will be constructed and made available by Dublin Port at Berth 18 and on the southside of the river within the 3FM project.

In addition, based on the data provided by DPC there has been no evidence of unmet demand for additional tug services from the shipping market. In the absence of such demand, the provision of further permanent towage berthage cannot, at this time, be justified and it may introduce unnecessary complexity, congestion, and risk into an already highly constrained port environment. Such an outcome would be contrary to the principles of safe port operation and the efficient management of critical national infrastructure, without leveraging additional towage services demand.

Having regard to the findings set out in the report, it is concluded that the Harbour Master has undertaken a comprehensive, evidence-based assessment of towage berthage requirements and has arrived at conclusions that are proportionate, and aligned with best practice in port safety management and international best practices. Therefore, I support the Report's conclusion, including that the existing dedicated towage arrangements at berths 18 and 50N are adequate and appropriate to meet current operational needs in a safe and proper manner and that no additional towage arrangements are warranted at this time.

Accordingly, I endorse the report and support its findings and recommendations.

Yours faithfully,


Antonios Boutatis

Managing Director