



Harbours Bill

**Committee for Infrastructure
Call for Evidence**

Belfast Harbour Submission

August 2026

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1. Introduction

Foreword by the Chair of Belfast Harbour Commissioners

Belfast Harbour welcomes the opportunity to contribute to the Committee for Infrastructure's scrutiny of the Harbours Bill.

At the outset, I wish to acknowledge the leadership shown by Minister Kimmins MLA, the NI Executive and officials within the Gateways Division of the Department for Infrastructure, throughout the development of these proposals. The process has been characterised by meaningful engagement, transparency and collaboration, reflecting a shared ambition to ensure Northern Ireland's Trust Ports are equipped to meet the challenges and opportunities of the decades ahead. I would also like to thank the Committee Chair, Deputy Chair and all members for their engagement, time and consideration of this legislation.

I would also like to recognise the constructive and collaborative approach adopted by colleagues across NI's Trust Port sector. While each port serves a distinct community and economy, there has been a shared recognition that the current legislative framework no longer reflects the realities of modern ports. The reforms proposed through the Harbours Bill represent the culmination of significant engagement between ports, government and stakeholders over a number of years, and demonstrate a collective commitment to ensuring that the region's Trust Ports can continue delivering economic, environmental and social value for future generations.

Notably, the outworkings of the reforms, once enacted, would not diminish Belfast Harbour's commitment to collaboration across the Trust Port sector. We will continue to work closely with fellow Trust Ports in NI, sharing knowledge, expertise and support, recognising the important contribution each makes to local communities and the wider regional economy.

Legislation for Safer, Stronger Ports

It is of critical importance that the Committee is aware that the purpose of the Harbours Bill is not to alter Belfast Harbour's fundamental role, purpose or responsibilities. It is not privatisation. It is not deregulation. It is not the removal of accountability, transparency or oversight.

Rather, the Bill represents a sensible and proportionate modernisation of the legislative framework governing the region's Trust Ports. It will make NI Trust Ports, safer and more efficient, and ultimately, afford us greater financial flexibility; placing us on a level footing with comparable ports elsewhere in the UK whilst preserving the principles that have underpinned the Trust Port model for generations.

At a time when public finances are under significant pressure, this legislation presents a rare opportunity to unlock substantial new investment in the region's Trust Ports without placing any additional burden on the public purse. This is not legislation seeking public funding. On the contrary, it is legislation designed to unlock new investment for NI.

As a result, support for these reforms extends well beyond the Trust Port sector itself. During the Department for Infrastructure's consultation on the future governance of NI's Trust Ports in 2025, widespread support was expressed by a broad coalition of stakeholders, including Trust Port users,

representative business organisations and political parties. The policy direction underpinning these reforms was subsequently endorsed by the NI Executive through its approval of the Bill for Assembly consideration. Crucially, Belfast Harbour's own Masterplan 2025-50 consultation recorded a 95% endorsement rate from stakeholders, with many respondents specifically recognising the importance of reclassification and legislative reform in enabling the long-term investment required to deliver the ambitions set out within our port-centric Masterplan.

Belfast Harbour Helping NI to Thrive

Since the 1600s, the port at Belfast Harbour has served as a strategic gateway for the regional economy. Today, we handle approximately 70% of NI's seaborne trade and around 25% of all seaborne trade on the island of Ireland. That trade is worth almost £27 billion annually. Independent analysis by Ulster University's Economic Policy Centre demonstrates that Belfast Harbour contributes £8.8 billion in Gross Value Added each year and supports approximately 155,000 jobs across the wider economy (see Figure 1 below).

However, Belfast Harbour's role extends beyond trade alone. As a Trust Port, we exist not for shareholders but for the public benefit. Every surplus generated by Belfast Harbour is reinvested into the port, its infrastructure and the communities we serve. This model has enabled us to invest more than £692 million in capital projects over the past 25 years while supporting port capacity and services, regeneration, community development and environmental improvement across Belfast and beyond.

The publication of our Masterplan 2025-2050 'Horizons of Opportunity' demonstrates the scale of our ambition for our customers, communities, the city and region. It sets out a pathway for up to £1.3 billion of investment in nationally significant port infrastructure, supporting trade growth, clean energy, energy security and economic competitiveness. Our plan clearly articulates that our focus is on port primacy and continuing to deliver improvements for our port customers. It also outlines opportunities to contribute towards wider Executive and city priorities through the delivery of up to 3,500 homes, major regeneration projects and increased investment in skills, employability and community development.

Importantly, the ambitions we seek to fulfil through our Masterplan and subsequent 5-year operating strategies are not Belfast Harbour's alone. They are closely aligned with the Programme for Government's objective of creating a globally competitive and sustainable economy, supporting climate action and delivering opportunity for all. They are also aligned with the Belfast Agenda's ambitions for housing delivery, economic growth and the creation of a better connected and more prosperous city. Through our Masterplan, Belfast Harbour is seeking to play its full part in helping government deliver these shared outcomes.

Unlocking the Potential of all NI Trust Ports

Realising the full potential of our transformative investment programme, and the wider economic and social benefits that flow from it, is closely linked to the successful implementation of the wider Trust Port reform programme, starting with the Harbours Bill. While Belfast Harbour can continue to invest and grow under existing arrangements, the pace and scale at which we can do so is constrained by our current accounting classification. Without reform, we can continue to make progress. With reform, we can go further and faster.

The Harbours Bill is the first step in enabling the Office for National Statistics (ONS) to review and reclassify the accounting status of NI's Trust Ports. This would allow Belfast Harbour, and our

colleagues at Coleraine Harbour, Foyle Port and Warrenpoint Harbour, to access additional borrowing, effectively, prudently and responsibly against our respective balance sheets in support of long-term investment. This is about providing Trust Ports with the same tools available to comparable ports elsewhere in the UK, enabling greater investment in infrastructure, capacity and growth for the benefit of the region. In addition, Belfast Harbour is particularly encouraged that the Bill, will strengthen the framework available to the region's Trust Ports to support their safe and efficient operation.

The Harbours Bill – a Critical First Step

To be clear, ONS reclassification is dependent upon the successful progression of both the Harbours Bill and the associated Harbour Orders. Both are intended to address a small number of specific provisions which are relevant to the assessment by ONS. Given the interdependency of these measures, it is important that the necessary legislative framework is in place before the conclusion of the current Assembly mandate. Doing so will provide certainty for stakeholders and enable ONS to consider the classification question at the earliest opportunity. The result will be more investment, delivered more quickly, and at no cost to the taxpayer.

We look forward to continuing our constructive engagement with the Department for Infrastructure on Belfast Harbour's Harbour Order and on the development and implementation of a new Code of Practice, both of which will be critical to the successful delivery of the wider reform programme.

The proposed Code of Practice will provide an additional layer of transparency, accountability and governance across the sector, complementing the extensive statutory, regulatory and governance obligations to which NI Trust Ports are already subject. Together, these measures will help ensure that increased flexibility is accompanied by robust oversight and continued public confidence.

NI Trust Ports – Delivering Prosperity for Generations to Come

Belfast Harbour encourages the Committee to support the principles and objectives underpinning the Harbours Bill and to recognise the strong and broad-based support that already exists across business, industry, customers, political representatives and wider stakeholders for these reforms. We also encourage the Committee and the Department for Infrastructure to continue progressing the wider reform programme, including the Harbour Orders and Code of Practice, during the current Assembly mandate. Taken together, these measures represent an opportunity to unlock investment, strengthen governance, enhance accountability and support the long-term competitiveness of the regional economy, all without placing additional demands on the public purse.

Belfast Harbour stands ready to assist the Committee throughout its scrutiny of the Harbours Bill. We would be pleased to welcome Members to the Port to see first-hand the scale of our operations and our ambitions for the future, to participate in oral evidence sessions, and to provide any further information that may assist the Committee in its deliberations.

Northern Ireland cannot afford for its strategic infrastructure to be constrained by legislation designed for a different era. This Bill is an opportunity to ensure our Trust Ports remain equipped to support prosperity, sustainability and opportunity for generations to come. We respectfully ask the Committee to help enable that future.

Dr Theresa Donaldson

Chair, Belfast Harbour Commissioners

2. How Belfast Harbour Helps Northern Ireland Thrive

What Belfast Harbour Does for the regional Economy, Environment and Society

Belfast Harbour is NI's principal port and one of the region's most important strategic assets. Every year, we facilitate almost £27 billion of trade, handle approximately 70% of the region's seaborne trade and support around 155,000 jobs across the wider economy. From food and fuel to construction materials and consumer goods, much of what businesses and consumers across NI rely upon every day passes through Belfast Harbour. Port primacy and safeguarding the critical infrastructure within our management remains our absolute priority.

As the region's primary maritime gateway, we play a critical role in maintaining the resilience and competitiveness of the regional economy. Belfast Harbour provides the infrastructure, connectivity and capacity that enable many of NI's most successful businesses to compete and grow. Companies such as W&R Barnett, a cornerstone of the agri-food sector, rely upon efficient port infrastructure to support complex supply chains and international trade. Our long-standing partnership with Stena Line ensures vital passenger and freight connectivity across the Irish Sea, supporting trade flows between NI and GB, safeguarding key economic links.

Our contribution extends beyond trade. Belfast Harbour actively supports industrial development, foreign direct investment and economic diversification. Working with Navantia we are helping facilitate the resurgence of shipbuilding and advanced manufacturing in Belfast and further supporting the growth ambitions of Airbus and Boeing. We continue to support the growth of Titanic Quarter, through our partnership with Titanic Quarter Limited, and this is now one of Europe's most successful waterfront regeneration projects, home to the world-leading attraction Titanic Belfast. City Quays has is home to major indigenous and international employers, attracting significant inward investment, supporting thousands of jobs and reinforcing Belfast's reputation as a competitive location for business.

Tourism is another important part of Belfast Harbour's contribution to the regional economy. Belfast is now the busiest cruise port on the island and the second busiest cruise port in the UK. Cruise tourism alone generates over £26 million annually for the local economy, bringing hundreds of thousands of visitors to the region each year and supporting businesses across the tourism and hospitality sectors.

Belfast Harbour is also helping address some of the most significant challenges facing the region. Through our Masterplan 2025-2050, we have identified opportunities to support the delivery of up to 3,500 homes across the Harbour Estate, directly supporting the ambitions of the Belfast Agenda and helping address housing demand in Belfast. Alongside housing, we continue to invest in regeneration, placemaking and public realm projects that improve connectivity between the city and waterfront.

A notable example is City Quays Gardens, NI's first public park designed to One Planet Living standards. Located at the heart of City Quays, it provides accessible green space for residents, workers and

visitors, and demonstrates our commitment to creating places that support both economic activity and quality of life.

Environmental stewardship is central to Belfast Harbour's long-term vision. We have reduced carbon emissions by more than 70% since 2015 and are on track to become the first net zero port operator on the island. We continue to invest in clean technologies and sustainable operations while supporting the growth of the offshore renewable energy sector.

Belfast Harbour has already played a significant role in enabling offshore wind deployment around these islands through investment in specialist infrastructure. Our £53 million Offshore Wind Terminal has facilitated delivery of projects generating over 1.3GW of renewable energy, enough to power more than one million homes.

Looking to the future, Belfast Harbour is well placed to support the next generation of offshore wind development. In 2025, we announced an agreement worth up to £100 million with JERA Nex bp for the marshalling and assembly of components for the Mona Offshore Wind Farm, reinforcing Belfast's position as a strategically important hub for the offshore wind industry in the Irish Sea. Projects such as Mona demonstrate the scale of opportunity available to NI as investment in offshore renewable energy accelerates across the UK and Ireland.

Our commitment to the environment extends beyond carbon reduction. Belfast Harbour protects more than 125 acres of designated nature conservation land and is actively supporting biodiversity enhancement projects across the estate, including pioneering work to restore native oyster populations within Belfast Lough. This demonstrates our belief that economic growth and environmental leadership can, and should, go hand in hand.

Equally important is our commitment to communities. As a Trust Port, we operate for public benefit rather than private gain. We ringfence 1% of annual operating profit for community investment, an approach matched by only a small number of FTSE 100 companies and unique amongst ports on the island of Ireland. Over the past decade, Belfast Harbour has invested more than £3.5 million through its community investment programmes.

In 2027 alone, Belfast Harbour expects to invest approximately £440,000 through direct community funding, alongside an estimated £250,000 of support in kind. This includes the provision of rent-free accommodation and facilities for organisations such as Sea Cadets and SS Nomadic. As Belfast Harbour continues to grow and succeed, the value of our community investment will also increase, ensuring that economic success translates directly into social benefit for the communities we serve.

The port is, and will remain, at the heart of everything Belfast Harbour does. We are also a trade gateway, an infrastructure investor, a regeneration partner, a foreign direct investment enabler, a clean energy facilitator, a steward of the natural environment and a long-term investor in communities. The success of Belfast Harbour supports the success of the region. Every investment we make strengthens economic competitiveness, creates opportunity, improves resilience and delivers wider public benefit for current and future generations.

Figure 1: How Belfast Harbour Helps Northern Ireland Thrive

Source: Belfast Harbour Masterplan 2025-50 'Horizons of Opportunity'



3. What a New Modernised Legislative Framework Delivers

The Harbours Bill is not an end in itself. Its significance lies in what it enables the region's Trust Ports to deliver for the wider economy, environment and society in the years ahead.

The Bill and the subsequent Harbour Orders provide the foundations for the Office for National Statistics (ONS) to review the accounting classification of all NI Trust Ports. Once reclassified, the region's Trust Ports could operate on a more competitive footing, comparable to Trust Ports in Scotland and many Trust Ports in England and Wales. Critically, reclassification would enable NI Trust Ports to borrow more effectively, prudently and responsibly to support long-term investment, removing a longstanding constraint on growth and infrastructure development.

The implications extend far beyond Belfast Harbour. They are about unlocking investment, accelerating delivery and increasing the contribution that Trust Ports can make to the region's economy, environment and society.

In addition, but perhaps more fundamentally, the reforms will modernise the powers available to NI's Trust Ports, strengthening our ability to support navigational safety, manage harbour operations effectively and respond to the evolving demands of a modern maritime sector.

Port Primacy to Support Economic Growth, Trade and Competitiveness

At its core, Belfast Harbour exists to serve its port customers and facilitate trade. Port primacy is, and will remain, Belfast Harbour's primary purpose. Our current 2025-29 Strategy sets out an ambitious programme to invest more than £300m in capital projects across the port and Harbour Estate over a five-year period. Entitled 'Advance Regional Prosperity 2025-2029', this bold plan outlines Belfast Harbour's aims to invest £208m, or two thirds of our capital expenditure over that period, in significant port improvements with £105m in the ongoing regeneration and development of the Harbour Estate and waterfront.

Everything outlined within our Masterplan 2025-2050 is also built around ensuring NI continues to benefit from a competitive, resilient and future-ready port capable of meeting the needs of our customers, consumers and communities for decades to come.

The Masterplan itself was shaped through one of the most extensive engagement exercises ever undertaken by Belfast Harbour. Over a two-year period, we engaged with customers, tenants, statutory stakeholders, elected representatives, business organisations and local communities through more than 50 stakeholder briefings, city-wide engagement events, deliberative workshops and a formal public consultation. The resulting vision received support from 95% of respondents, demonstrating a strong consensus around the need to invest in the port and prepare for future growth.

That engagement confirmed a clear message from customers and stakeholders alike: investment in port capacity and infrastructure is essential if the region is to remain competitive in an increasingly challenging global marketplace.

The number one stakeholder priority expressed was the importance of ensuring port operational resilience and capacity. The Masterplan therefore reinforces port primacy throughout and outlines up to £1.3 billion of port infrastructure investment across the three horizons to 2050. To be clear, the Masterplan is completely centred around investment in the port and delivering for port customers.

This is reflected in the intention to advance major port projects, the most significant being the redevelopment of Stormont Wharf, which will be the single largest investment by Belfast Harbour in the next 25 years. This strategic project will further strengthen our deepwater capability and operational resilience and is critical to key port users in ensuring agri-food supply chain efficiency.

Independent forecasts commissioned as part of the Masterplan indicate that trade volumes through Belfast Harbour could increase significantly over the coming decades. Under a steady growth scenario, throughput is projected to increase from approximately 24 million tonnes today to more than 30 million tonnes by 2050. Under higher-growth scenarios, throughput could reach between 40 and 50 million tonnes annually. Importantly, the analysis concluded that under almost every scenario, future demand will outpace existing infrastructure capacity before mid-century without planned investment.

Meeting that demand requires long-term investment in deepwater capacity, quays, terminals, logistics facilities and supporting infrastructure. The Harbours Bill and subsequent Harbour Orders will help create the conditions necessary to unlock that investment by enabling reclassification and allowing Trust Ports to borrow prudently against their balance sheets, as comparable ports elsewhere in the UK already do. In doing so, this legislation will help ensure Belfast Harbour can continue delivering what customers have told us they need: a competitive, resilient and future-focused port capable of supporting NI's ambitions for growth, productivity and international competitiveness.

Unlocking Major Investment Without Burdening the Public Purse

At a time when public finances remain under considerable pressure, the reforms offer an opportunity to unlock substantial new investment without requiring additional public expenditure.

As stated, Belfast Harbour's Masterplan identifies up to £1.3 billion of investment in nationally significant port infrastructure over the next 25 years. This includes investment in deepwater quays, freight and logistics facilities, offshore renewable energy infrastructure and strategic trade capacity designed to support future economic growth for the region.

This is not a request for public funding. On the contrary, it is an opportunity to unlock significant new investment into NI without placing additional demands on the public purse. Reclassification would enable Trust Ports to access private capital more effectively and responsibly, creating greater flexibility to fund major infrastructure projects through prudent borrowing and long-term investment planning.

Without reform, investment can continue. With reform, investment can be accelerated, expanded and delivered at a scale more closely aligned to the future needs of the economy and the customers we serve.

Supporting Housing, Regeneration and Place Making

The benefits of these reforms extend beyond our primary port operations, which will remain our core priority.

Belfast Harbour's Masterplan outlines opportunities to contribute to the delivery of up to 3,500 homes across the Harbour Estate, directly supporting the ambitions of the Belfast Agenda and wider objectives to increase housing supply, including social and affordable homes.

The Harbour Estate has already demonstrated the transformative impact that long-term investment can have through projects such as Titanic Quarter, City Quays and City Quays Gardens. Collectively, these developments have attracted significant inward investment, created thousands of jobs and strengthened Belfast's position as an attractive location in which to live, work and invest.

Future investment has the potential to create new homes, improve connectivity, enhance public realm and further strengthen Belfast's attractiveness as a destination for residents, businesses and visitors alike.

Supporting Energy Security and the Net Zero Transition

A modern legislative framework will also strengthen Belfast Harbour's ability to support the energy transition and contribute to the region's energy security ambitions.

Belfast Harbour has already invested significantly in offshore wind infrastructure and has played a key role in enabling renewable energy generation around these islands. Our £53 million Offshore Wind Terminal has supported projects generating more than 1.3GW of renewable energy.

Looking ahead, Belfast Harbour is well positioned to support the next generation of offshore wind development. Agreements such as the up to £100 million investment associated with JERA Nex bp's Mona Offshore Wind Farm demonstrate the scale of opportunity available to Belfast and wider region, as offshore renewable energy continues to expand.

As NI seeks to enhance energy security, reduce emissions and transition towards a net zero economy, Belfast Harbour can play an increasingly important role as an enabler of investment, supply chain development and renewable energy deployment.

Delivering Greater Community Benefit and Opportunity

As a Trust Port, Belfast Harbour's success directly benefits the communities we serve.

Unlike commercial organisations that distribute profits to shareholders, all surpluses after tax generated by Belfast Harbour are reinvested for public benefit. Central to this commitment is our pledge to ringfence 1% of annual operating profit for community investment, an approach matched by only a small number of FTSE 100 companies and unique amongst ports on these islands.

Over the last decade, Belfast Harbour has invested more than £3.5 million through its community funding programmes, supporting employability initiatives, education programmes, environmental projects, health and wellbeing initiatives and community organisations across Belfast and beyond.

In 2027 alone, Belfast Harbour anticipates investing approximately £440,000 through direct community funding, alongside an estimated £250,000 of support in kind. This includes the provision of rent-free accommodation and facilities for organisations such as Sea Cadets and SS Nomadic, supporting important heritage, educational and community activities.

The Masterplan also identifies the creation of a Maritime Skills Academy as a key strategic outcome. The Academy will help ensure that the employment opportunities created through port expansion, offshore renewable energy, logistics, advanced manufacturing and maritime industries are accessible to people across Belfast and the wider region. By connecting infrastructure investment with education, training and workforce development, the Academy will help create inclusive pathways into high-quality employment while supporting the future skills needs of the regional economy.

As Belfast Harbour grows and succeeds, the value of these investments will grow in parallel. The reforms proposed through the Harbours Bill therefore have the potential to create a virtuous circle whereby increased economic success generates more investment in communities, employability, skills development, environmental initiatives and wider social outcomes.

A Stronger Future for the Region

Ultimately, the proposed legislative reforms are not about changing the fundamental purpose of NI's Trust Ports which is to safeguard the critical infrastructure under our stewardship.

They are about ensuring that Trust Ports remain equipped to fulfil that purpose in the decades ahead.

For Belfast Harbour, this means creating the conditions to accelerate investment, strengthen trade connectivity, support customers, enhance energy security, contribute to housing delivery, grow community investment and improve the region's economic competitiveness.

The Harbours Bill and subsequent Harbour Orders will not, on their own, deliver these outcomes. However, they are essential enablers of the investment required to achieve them. By creating the conditions for reclassification and enabling Trust Ports to borrow prudently and responsibly to fund long-term infrastructure investment, the new legislative framework will unlock opportunities that benefit businesses, communities and future generations alike.

In that sense, these reforms are not simply about port governance. They are about creating the conditions for greater prosperity, sustainability and opportunity across the region for generations to come.

4. Safety, Accountability and Transparency

Belfast Harbour recognises that accountability and transparency are fundamental to maintaining public confidence in the Trust Port model and are at the core of our social license to operate.

As a Trust Port, Belfast Harbour does not operate for private shareholders. We operate for the benefit of the region and are accountable to the customers, communities, businesses and stakeholders we serve. We therefore welcome focus on ensuring that any legislative reform maintains robust standards of governance, transparency and public accountability.

A key principle underpinning the Harbours Bill is that modernisation should not come at the expense of accountability. Belfast Harbour firmly believes that the legislation achieves this balance.

The Bill does not remove accountability. Nor does it remove oversight. Rather, it modernises governance arrangements whilst retaining the core principles of transparency, public scrutiny and responsible stewardship that are central to the Trust Port model.

Trust Ports will remain subject to a wide range of statutory, regulatory and governance requirements. These include annual reporting obligations, independent external audit, environmental regulation, planning legislation, health and safety obligations, company law requirements and ongoing scrutiny from customers, stakeholders, regulators and government.

Our current Masterplan also sets the clear direction for capital investment in the years ahead with the port remaining our key priority and overriding focus. This is a direct response the feedback we received from stakeholders during our Masterplan consultation phase during a two-year period.

Meanwhile, it is important to distinguish between the respective roles of the Harbours Bill, the proposed Harbour Orders and the future Code of Practice:

- (i) The Harbours Bill provides the primary legislative framework for the modernisation of the region's Trust Ports, including two vital changes designed to support ONS reclassification. This is outlined in Clause 1 with sets out a removal of the power to initiate transfer of harbour authorities and Clause 2 which is around the removal of the power to issue directions to harbour authorities.

In addition, Clause 4 introduces a framework for Harbour Directions. It is important to distinguish these from the power of the Department to issue directions to harbour authorities under Clause 2. Harbour Directions are operational measures used by harbour authorities to support the safe, efficient and effective management of navigation and marine activity within their harbour areas. Widely used across ports elsewhere in the UK, they provide harbour authorities with a modern mechanism to regulate vessel movements and address local navigational and operational requirements. Belfast Harbour welcomes their inclusion within the Bill, recognising their potential to strengthen the framework available to Trust Ports to augment navigational safety and bolster the safe and efficient operation of our ports.

- (ii) The Harbour Orders, which are still in draft form and remain subject to further consultation and scrutiny by the Committee and Assembly, will provide the detailed governance arrangements that apply to individual NI Trust Ports. This includes granting additional powers for the purpose of improving, maintaining and managing a harbour. The Orders will set out a further vital change designed to support ONS reclassification around the removal of majority board appointments by the Department.

Key public safeguards will remain in place, including the continued appointment of the Chair by the Minister and the continued representation of elected Councillors on Belfast Harbour Commissioners Board and the introduction of a new Code of Practice. Furthermore, NI's Trust Ports will continue to operate within a comprehensive framework of statutory, regulatory and governance requirements, including planning, environmental, health and safety, audit and reporting obligations. Importantly, the Harbour Orders form a critical component of the framework required to enable ONS to review the accounting classification of NI's Trust Ports. Their timely progression will therefore be important in providing certainty for stakeholders and enabling ONS to consider the classification question at the earliest opportunity.

- (iii) The proposed new Code of Practice for NI Trust Ports, of which Belfast Harbour has seen only an early draft, will complement both by setting out governance, transparency, accountability and reporting expectations across the sector.

Taken together, these elements have the potential to create a balanced framework which combines greater commercial flexibility with robust accountability, transparency and public oversight, while safeguarding the Trust Port Model.

Belfast Harbour welcomes the Department's commitment to developing a Code of Practice for the region's Trust Ports and looks forward to continuing engagement on its development. While we have reviewed an early draft of the proposed Code, we recognise that it remains subject to further refinement and consultation. We therefore welcome the opportunity to work collaboratively with the Department for Infrastructure to help shape a final Code which reflects both best practice governance and the operational realities of modern Trust Ports.

Whilst NI has not previously had a dedicated Trust Port Code of Practice, Belfast Harbour has voluntarily aligned itself for many years with the Department for Transport's Ports Good Governance Guidance and the principles of the UK Corporate Governance Code. These frameworks are founded upon principles of openness, accountability, stakeholder engagement, effective board leadership, transparency, commercial accountability, risk management and responsible stewardship of nationally significant assets.

In practice, this means Belfast Harbour already operates according to recognised best practice in areas such as annual reporting, stakeholder engagement, board governance, succession planning, audit and assurance, ethical conduct, strategic planning, risk management and transparency. This commitment to good governance has existed independently of the current legislative reform programme and reflects our longstanding belief that commercial success and public accountability should go hand in hand.

The proposed NI Code therefore represents an opportunity to build upon existing good practice and provide greater consistency across the sector. Subject to its final content, we believe it can help reinforce public confidence, support high standards of governance and provide clarity for Trust Ports, stakeholders and government alike.

Transparency is not simply a statutory obligation. It is a core principle of how Belfast Harbour operates.

This commitment is reflected in the publication of our Annual Report and Accounts, the public consultation undertaken on our Masterplan 2025-2050, our ongoing engagement with customers, communities, media and stakeholders, and the extensive information we place in the public domain regarding our activities, investments and performance.

The development of our Masterplan provides a strong example of this approach in practice. As outlined above, this involved a comprehensive stakeholder engagement and community consultation process over a two-year period, resulting in significant support from respondents.

For Belfast Harbour, accountability and commercial success are not competing objectives. They are mutually reinforcing. As a Trust Port, our success is measured not only by the performance of the Port itself, but by the value we create for the economy, environment and communities we serve.

5. Belfast Harbour Commentary on the Bill

Belfast Harbour acknowledges the engagement with the Department to date, welcomes the progress made in drafting the Bill and is content to support the Bill as drafted.

We believe that the Bill will strengthen our ability to deliver the investment outlined in our port-centric Masterplan. Supplementing the general comments made earlier in this submission, the specific points that Belfast Harbour wishes to make are as per below. It should be noted that we are engaging with the Department for Infrastructure in relation to the queries listed here:

Clause 2 (Directions to harbour authorities)

Further clarity is sought on subsection (3) to fully understand from the Department what they have in mind in terms of any consequential amendments (including omissions) to other provisions of the 2002 Order, as it is not clear.

Clause 4 (Harbour Directions)

Belfast Harbour requests further detail on what the administrative process and timing will be for ‘authorisation orders’ made under the new section 27A(1) of the 1970 Act.

We consider that the new section 27A(6) of the 1970 Act would be clearer if it were to refer to ‘... an order authorising a harbour authority to give harbour directions may amend or repeal...’.

It would also be helpful if the Department were to confirm that the provisions of Clause 4 will be in addition to Belfast Harbour having a bespoke power, under the new Belfast Harbour Order, to give Harbour Directions. This would be the same as elsewhere in the UK, where many harbour authorities have a bespoke power in their local legislation to give such general directions, even though there is a general power (which is almost identical to Clause 4) in the Harbours Act 1964.

Clause 6 (Commencement)

Belfast Harbour would find it helpful to understand from the Department what the plans are for commencement of the Bill’s provisions, in terms of timing and any other related steps or measures required.

6. Conclusion

Belfast Harbour is a thriving Trust Port, and the leading gateway and key economic hub for trade and tourism. It handles millions of tonnes of cargo each year, supporting businesses by importing essential goods and exporting local products to markets around the world. The harbour also serves as a major gateway for tourism, welcoming cruise ships and ferry passengers, which boost the local economy. In addition, it provides thousands of jobs both directly and indirectly, contributing to economic growth. With ongoing and planned investment primarily in port infrastructure, but also renewable energy projects and waterfront regeneration, Belfast Harbour continues to be a key driver of prosperity and an important link between Northern Ireland and the rest of the world.

The introduction of a new legislative framework presents the NI Assembly with a significant opportunity to modernise the policy framework governing the region's Trust Ports. This will place Trust Ports on a more competitive footing, support growth in trade, and create greater opportunities for transformative regeneration and economic development.

Crucially, the legislation will enable the process of ONS reclassification to begin. Once completed, reclassification has the potential to unlock additional investment through prudent borrowing, allowing Trust Ports to invest in critical port infrastructure such as Stormont Wharf. It is important to reiterate that this is a technical accounting change only and comes at no cost to the public purse.

Reclassification will not alter the Trust Port model, which has served NI well for many decades. Trust Ports will continue to reinvest all profits into the port, its infrastructure and the communities they serve.

To facilitate ONS reclassification, three targeted legislative changes are required: limiting powers relating to the transfer of harbour authorities; limiting powers to issue directions to harbour authorities; and removing the Department's power to appoint the majority of board members.

Alongside these changes, accountability and transparency will be strengthened through new subordinate legislation in the form of Harbour Orders and the introduction of a Code of Practice. Robust oversight and governance arrangements for all Trust Ports will therefore remain firmly in place.

The approval of the Harbours Bill and the associated legislative and policy framework will be transformative for Belfast Harbour and the other NI Trust Ports. It will enable Belfast Harbour to build on its position as the gateway for 25% of all seaborne trade on the island of Ireland while accelerating delivery of our 2025–2050 Masterplan. This includes investing in critical port infrastructure as our number one priority, supporting ambitious trade growth, delivering new neighbourhoods and employment opportunities, contributing to climate action, and continuing to generate long-term benefits for the communities around us.

The legislation will help safeguard Belfast Harbour for future generations by ensuring we have the flexibility to invest in the infrastructure capacity required to meet future demand and maximise the economic and social value of both the port and the wider estate. In doing so, our contribution to the regional economy will continue to grow.

Belfast Harbour appreciates the importance and value of our tenants and customers who are the driving force behind the success of port operations. Our plans protect port primacy, ensuring land and

infrastructure for trade and logistics. The Harbours Bill will form the basis of delivering further and faster for our port users as we look ahead into the second half of this century.

We recognise that there is a limited window to progress this legislation during the current 2022–2027 Assembly mandate. We therefore respectfully highlight the need for robust and efficient scrutiny during Committee Stage to enable the Bill to proceed to Consideration Stage at the earliest opportunity.

Belfast Harbour looks forward to continuing to work collaboratively with the Department, the Committee and all stakeholders as we seek to enact this important legislation, and we again place on record our appreciation for the significant work undertaken to date.