From: [redacted]
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To: MARA Licence
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Reference: MUL260006
Dear Sir or Madam,

For many of us, concerns about water quality are not theoretical or just to tick a box.
I, my wife and our three daughters are residents of Lahinch and regular year-round surfers in Lahinch Bay. Through our frequent use of the bay, we have experienced on numerous occasions illnesses that we believe are linked to poor water quality, including ear infections, throat infections, sinus infections, gastrointestinal illness causing diarrhoea and vomiting, and infections arising from minor cuts and abrasions. These incidents have often resulted in medical expenses, doctor visits and courses of antibiotics. Our family's experience reflects a wider concern among regular water users that existing wastewater treatment arrangements are already failing to adequately protect public health and water quality in Lahinch Bay.

As we understand it, the existing wastewater treatment plants at Ennistymon and Lahinch provide sewage treatment. While this is clearly inadequate and requires replacement, wastewater discharged from Ennistymon currently benefits from the additional natural filtration, sedimentation and biological treatment that occurs as it passes down the River Inagh before reaching the sea.
The proposed development would replace the two existing plants with a single treatment facility and marine outfall discharging directly into the ocean.
In doing so, it appears to remove the natural filtration and settlement processes currently provided by the River Inagh between Ennistymon and Lahinch, instead piping directly into the ocean.

This is particularly concerning given the proposed outfall location between Cregg Beach and Barrtra Point, two of the best known and most heavily used surfing locations in Ireland. During periods of good swell it is common for dozens of surfers to be in the water at these locations, in addition to swimmers and other recreational users. Any proposal that has the potential to further affect water quality in this area warrants the highest level of scrutiny, particularly where public health impacts may arise for the many people who use these waters throughout the year.

My primary concern is that the headcount numbers for deciding upon secondary treatment instead of tertiary seem massaged to come in just under that requiring tertiary treatment. Coupling that with the placement of the outfall pipe mere meters outside a SAC, negating the

enforced tertiary treatment show that this project has as its primary endeavor to reduce costs at the expense of public health and safety.

Of other note:-

• The Council's concerns have not been answered. Clare County Council warned that secondary treatment will not guarantee no impact on water quality "and in particular on human health", that Area A is too restrictive, and that Cregg may have a shallow shelf with poor mixing. We can find no answer on MARA's public file. The revised Natura Impact Statement still describes the plant as providing "at least secondary treatment".

• Heavy works on a shore people use. Up to 20 boreholes in the bay, a jack-up platform, seabed sound surveys using boomer or sparker equipment, and trial pits on Cregg Beach up to 4 metres deep dug by excavator, under a licence sought for two years. The application says nothing about public access to Cregg during the works. Closing the shore to walkers, swimmers and surfers without a plan agreed with the community would be unacceptable.

• Wildlife not properly assessed. Seal surveys of the bay in 2025 logged 116 records of two species, but the Natura Impact Statement does not analyse them, and the surveys are planned for the grey seal breeding and moulting season. Local people have found a honeycomb worm (Sabellaria alveolata) reef at Cregg. Reefs of this kind are a habitat type listed in Annex I of the EU Habitats Directive. The narrow-mouthed whorl snail, a protected species monitored by NPWS at Lahinch, is ruled out in a single sentence without any survey cited.

• Heritage. The applicant's own response of 26 June 2026 records two Bronze Age ring barrows about 140 metres east of the survey area at Cregg.

These points are set out in full in CCLWAG's submission.

We ask MARA not to grant licence MUL260006 and advise that tertiary treatment be adopted instead.

Yours faithfully,



