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Lahinch

Co Clare

Email [redacted]

20/10/2026

To: licence@mara.gov.ie
Maritime Area Regulatory Authority, Menapia House, Drinagh, Wexford, Y35 RF29

Submission on MUL260006: public health and the baseline for the Liscannor Bay outfall

Dear Sir or Madam,

I am a general practitioner in Lahinch & Corofin, where I have practiced for 16 years. I have lived in Lahinch for the past 16 years, and my family has been coming to the area for over 60 years. The beach and surrounding coastal waters have always been an integral part of my life and that of my family. Now, as a parent of two young children, aged five and three, the beach and sea remain central to our daily lives. My partner and I surf regularly at Cregg Beach, as well as at Lahinch Beach, and Barrtra Point. Our children enjoy bathing in the sea and have recently begun learning to surf. Because of the sheltered bay at Cregg beach, we take them there because the waves are smaller and more accessible for smaller children and novice surfers.

As a member of the local surfing community, and through my regular contact with the wider community, I have direct experience of the year-round use and importance of Cregg Beach. It is consistently used throughout all 12 months of the year for a wide range of recreational activities, including swimming, surfing, fishing, and foraging along the shoreline. Many people also choose Cregg Beach as an alternative to the busier beaches during the summer months. My family and I live approximately two kilometers from Cregg Beach and visit it weekly, giving us a close and consistent appreciation of its role as an important recreational amenity for Lahinch and the wider West Clare community.

In addition to my personal experience, my work as a local GP has given me a broader understanding of the importance of the coastline to the lives of people in this area. The beaches and sea are not simply places for recreation; they are an important part of people's physical and mental well-being, providing opportunities for exercise, relaxation, social connection and respite from the pressures of everyday life.

When I first arrived in Ennistymon and Lahinch as a GP registrar 16 years ago, I often wondered what drew people to this area and encouraged them to settle here. Over time, I came to recognize a consistent theme: the sea, the coastline, and the opportunities they provide are central to the appeal of this part of West Clare. Whether through surfing, long walks on the beach, cold-water swimming or simply spending time beside the water, the beaches and coastal waters of Liscannor Bay attract people throughout the year, not just during the summer months.

This connection with the sea is a defining feature of the local community and contributes significantly to people's quality of life, health, and sense of belonging. It is a recurring reason why people choose to move to the area, why they remain here, and why generations of families continue to return. Cregg Beach forms an important part of this wider coastal environment and should be recognized as a valuable, well-used and year-round community amenity.

I support proper wastewater treatment for Lahinch and Ennistymon. I am writing because these surveys will gather the evidence on which the health risks of a new sewage outfall into a heavily used bathing bay will later be judged, and as proposed, I do not believe they will gather the evidence needed to protect the people who use it.

These surveys are the baseline for the health assessment

The outfall still needs development permission, and that application will require an environmental impact assessment. Under the EIA Directive, that assessment must cover "population and human health" (Article 3(1)(a)). The applicant states that these surveys are required to "provide the baseline data necessary for the future consenting and detailed design of the WWTP outfall and diffuser" (revised Natura Impact Statement, section 1.1). Whatever is not measured now will be missing when the health risk is assessed.

The application describes the water sampling only as "Water quality sampling will also be undertaken at selected points within Liscannor Bay to establish baseline conditions" (revised Natura Impact Statement, page 19). It does not say what will be measured, where, or when.

For bathing water, the relevant measures are the two faecal indicator bacteria used under the Bathing Water Directive (2006/7/EC): Escherichia coli and intestinal enterococci. They need to be measured where people actually enter the water, at Cregg and at Lahinch, in the bathing season, and after heavy rainfall, when existing discharges and run-off are at their worst. A winter-only programme at offshore points would not tell anyone what bathers, swimmers and surfers are exposed to.

Clare County Council has already raised human health

In its observation on this application (17 April 2026), Clare County Council told MARA that the area is "frequently used by surfers, swimmers and general recreational use", that secondary treatment would not guarantee there would be no impact "in particular on human health at this location given its recreational use", and warned of "the very high potential that the bathymetric surveys will indicate a shallow coastal shelf in Cregg Beach area coupled with the modelling which may indicate a lack of mixing in this area". I can find no response to these points from the applicant.

Cregg is used for bathing & surfing by local families and visitors. This autumn, 194 people nominated Cregg Beach in the Council's public consultation on identifying bathing waters for 2027. As someone who passes Cregg beach multiple times per day and uses it regularly, it is consistently used all year around by the community near and far. Within that small area it has a small surf and bathing area, two surfing reefs (Cregg right and Moy right) and Barrtra point.

Where will the sewage go?

Whether treated effluent reaches the bathing areas depends on the currents and mixing in the bay. The surveys in this application map the seabed, take sediment and cores, drill boreholes and sample water (Tables 2-1 and 2-2 of the revised Natura Impact Statement). None of them

measure currents. The applicant refers to a separate Uisce Éireann license, MUL240033, for "Strategic water-current modelling surveys" along the Clare and Galway coasts (section 3.4). It is not clear from the record whether that work measures the currents in Liscannor Bay, close to Cregg and Lahinch, in enough detail to predict where effluent from this outfall will go. Without that, the Council's concern about "a lack of mixing" cannot be answered.

Antibiotic-resistant bacteria

A peer-reviewed study of UK coastal water users, the Beach Bum Survey, found that "9/143 (6.3%) surfers were colonised by blaCTX-M-bearing E. coli, as compared to 2/130 (1.5%) of non-surfers" (risk ratio 4.09) (Leonard and others, Environment International, 2018). Lahinch is a surfing beach, with surf schools teaching children and beginners. Antimicrobial resistance is a serious and growing problem in medicine. A baseline for this bay should record antibiotic-resistant bacteria now, so that any change after the outfall begins can be detected.

In my capacity as a local GP, over the past 16 years I have encountered numerous cases per year of infections or other clinical presentations that I consider potentially associated with the use of Lahinch Beach and its surrounding coastal waters. In my clinical experience, these presentations appear to be of particular concern during periods of heavy rainfall and throughout the summer months, when the local population increases significantly due to tourism and seasonal visitors.

The clinical presentations I have encountered include otitis externa (infection of the outer ear canal) in sea swimmers & surfers, as well as lacerations and other wounds sustained during beach and water activities that subsequently become infected and require antibiotic treatment. I have also encountered a serious case in which a patient developed pneumonia following a surfing incident involving prolonged submersion in high waves and subsequently required hospital admission for approximately three weeks for intravenous antibiotic treatment. While I cannot definitively attribute the cause of this patient's illness to seawater exposure, the case highlights the potential seriousness of illness arising in the context of marine recreational activities.

I have also observed an increase in gastrointestinal infections during the summer months. While the precise source of these infections cannot be established from clinical observation alone, the timing raises concerns about possible links with increased recreational water exposure, seasonal population pressures, and potential deterioration in bathing water quality associated with faecal contamination, including elevated levels of *E. coli*. These concerns are particularly relevant during periods when sewage infrastructure may be under increased pressure and when beach closures or water quality warnings are in place.

Concerns regarding gastrointestinal illness have also arisen in the context of participants in the Lahinch–Liscannor Swim. Although I cannot establish a direct causal relationship between these illnesses and seawater quality without appropriate epidemiological investigation and water quality data, such reports warrant attention and further assessment.

Based on my clinical experience, I would advise individuals with open wounds to avoid swimming or surfing in the waters of Liscannor Bay where there is a concern about contamination, given the potential risk of soft tissue infection and secondary bacterial infection following exposure to contaminated seawater.

There is a substantial body of scientific evidence demonstrating an association between exposure to microbiologically contaminated recreational water and an increased risk of illness. This evidence is relevant to the management of Lahinch Beach, Cregg Beach and the wider coastal waters of Liscannor Bay, where swimming and surfing are important year-round recreational activities.

Arnold et al. (2017), in a prospective study of surfers published in the *American Journal of Epidemiology*, found that recreational exposure to seawater was associated with an increased incidence of illness, with particularly notable associations between wet-weather exposure and ear infections and infected wounds. The study supports concerns that rainfall-related contamination may pose a particular risk to people who regularly surf and swim in coastal waters.

A systematic review and meta-analysis published in 2020, *Evaluating Health Risks Associated With Exposure to Ambient Surface Waters During Recreational Activities*, also identified increased risks of gastrointestinal and respiratory illness associated with recreational water exposure. Earlier epidemiological research, including a review published in the *International Journal of Epidemiology* in 1998, found evidence of an association between bacterial contamination indicators in recreational waters and gastrointestinal symptoms.

The World Health Organization's *Guidelines on Recreational Water Quality: Volume 1 — Coastal and Fresh Waters* (2021) provide authoritative guidance on the public-health risks associated with microbiological contamination of bathing waters. These guidelines emphasize the importance of identifying contamination sources, assessing exposure risks, and implementing effective monitoring and management measures to protect recreational water users.

Importantly, secondary wastewater treatment does not necessarily eliminate all disease-causing microorganisms. The potential health risk associated with a wastewater discharge depends on the effectiveness of treatment, whether additional disinfection is provided, the performance of the wider sewerage system, and the circumstances under which treated effluent or wastewater overflows enter receiving waters. It is therefore important to assess actual treatment performance and receiving-water quality rather than assume that the existence of a treatment plant alone guarantees safe bathing conditions.

The Environmental Protection Agency's *Bathing Water Quality in Ireland 2025*, published in 2026, provides further relevant Irish context. Although overall bathing-water quality remained high nationally, wastewater-related incidents were the most frequently reported cause of bathing-water problems, and heavy rainfall increased the risk of contamination. The EPA reported 79 pollution incidents resulting in temporary bathing-water closures during 2025, compared with 34 in 2024. These findings demonstrate the continuing importance of effective wastewater management, rainfall-related pollution warnings and timely public-health communication.

Taken together, these publications establish a credible scientific basis for concern about the potential health consequences of microbiological contamination in recreational coastal waters. They are particularly relevant where people have frequent and prolonged contact with seawater, where open wounds may be exposed, and where children regularly swim and play.

In light of this evidence, I believe there is a strong public-health justification for ensuring that wastewater treatment and sewerage infrastructure serving the Lahinch area are adequately assessed under both normal and peak seasonal conditions. This should include consideration

of treatment performance, any additional disinfection, stormwater and wastewater overflow events, rainfall-related changes in water quality, and appropriately timed monitoring of *E. coli* and intestinal enterococci in the receiving waters.

As a local GP with longstanding personal and professional experience in the area, I consider the protection of bathing-water quality to be an important public-health priority. The community's reliance on these beaches and coastal waters for recreation, physical activity and well-being makes it essential that potential contamination risks are properly investigated, transparently reported, and effectively managed. Given the importance of these coastal waters to the physical health, mental well-being and recreational lives of the local community and its visitors, maintaining safe access to these amenities must be an important public health priority.

No public health body has commented

I can find no observation from the Health Service Executive among the public body observations published on MARA's page for this application. Under the Bathing Water Quality Regulations 2008, it is the HSE that must be notified of situations that could affect the health of bathers. Its Environmental Health Service is the body best placed to say what this baseline should contain.

What I ask MARA to do

1. Consult the Health Service Executive, including its Environmental Health Service and Department of Public Health, before deciding on this application.

2. Require the water quality sampling to include E. coli and intestinal enterococci, at Cregg and Lahinch, at the water's edge where people bathe and surf, during the bathing season and after heavy rainfall, and not only in the winter survey window.

3. Require the sampling to include antibiotic-resistant bacteria, so that a baseline exists before any outfall is built.

4. Ask the applicant to confirm whether current measurements in Liscannor Bay, under MUL240033 or otherwise, will be sufficient to model where effluent from the proposed outfall would travel, including towards Cregg and Lahinch, and if not, to include them.

5. Require all water quality results to be published and shared with Clare County Council and the HSE.

The people who swim and surf in Liscannor Bay, many of them children, will live with this outfall for decades. The evidence on which its health risks are judged should be gathered properly now.

I also support the submission made by the Calluragh Cregg Lahinch Wastewater Action Group.

Yours faithfully,

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