West Coast of Ireland-
Surfrider Foundation
Europe

The Promenade
Lahinch, County Clare

E-mail:
westcoastireland@surfrider.eu

To: The Maritime Area Regulatory Authority (MARA)
By Email: licence@mara.gov.ie
Date: 23 October 2026

Submitters: West Coast of Ireland Chapter of the Surfrider Foundation Europe

RE: Public Consultation Submission regarding Maritime Usage License Application – Reference: MUL260006 (Uisce Éireann – Lahinch and Ennistymon Wastewater Treatment Plant Site Investigations)

To Whom It May Concern,

We are writing to formally submit an observation on behalf of the West Coast of Ireland Chapter of the Surfrider Europe Foundation regarding the Maritime Usage License application MUL260006 submitted by Uisce Éireann.

The Surfrider Europe Foundation is a non-profit organization dedicated to the protection and enjoyment of the world's oceans, waves, and beaches for all people through a powerful activist network. Our chapter represents a substantial community of water users, business owners, residents, and coastal custodians who utilize Liscannor Bay, Lahinch, and Cregg Beach daily. Our network also extends to the thousands of supporters that have also signed our submission.

While we fully support the urgent modernization of wastewater infrastructure for Lahinch and Ennistymon to prevent ongoing pollution, we hold serious concerns regarding the potential ecological disruptions of the proposed site investigation works, the lack of transparent stakeholder consultation, and the ultimate trajectory toward a marine outfall pipe at Cregg Beach.

We request that MARA takes the following material observations into account during its assessment of this application:

1. **Inadequate Stakeholder Engagement with Marine Users**

The local water sports and coastal recreation community has been excluded from meaningful dialogue with Uisce Éireann during all consultation phases. We have been attempting to engage, including in the years beforehand to discuss concerns and compensatory measures, without any direct response from Uisce Éireann. Please see Appendix 1 for further evidence.

At the time of those public windows, the specific preferred location for the pipeline route and effluent discharge zone (Cregg Beach) was not disclosed to the public. As a primary stakeholder group whose safety, livelihoods, and recreational environment are directly

impacted by any intervention in this specific marine zone, our chapter has not been granted transparent engagement. This statutory MARA consultation represents the first genuine opportunity for marine users to review these site-specific plans.

We were present at the May 2025 consultation & were informed that the location of such was yet to be determined but that the sewage “had to go somewhere” by engineers. We submitted in writing our request for tertiary treatment and more frequent and real-time water quality monitoring while awaiting the completed project. We have since submitted numerous ongoing requests as such to Uisce Éireann, including public notification of when & where sewage discharges were occurring, without any acknowledgement or response from Uisce Éireann. [Appendix 1]

We have long been involved in the campaign for improved water quality in the area since 2018 when our 2-year-old daughter contracted E.coli after swimming in Liscannor Bay and required emergency life-saving treatment at Temple Street Hospital. We never received any response from Uisce Éireann in our attempts to understand the potential source of pollution. Ireland has the highest notification rate of VTEC in Europe, and wastewater treatment plants with tertiary treatment are effective in prevention as such.

2. Statutory Framework and Requirements for Appropriate Assessment & Impacts of Acoustic and Physical Testing on Marine Ecology & Mammals

Insofar as Appropriate Assessment is concerned, determination must also satisfy Article 6(3) of the Habitats Directive and be supported by an assessment record containing sufficiently complete, precise, definitive, and reasoned findings to dispel reasonable scientific doubt. The evidence required to assess the effects of carrying out these surveys must be available before consent; the surveys cannot themselves supply missing information needed to authorize them.

We note that a Revised Natura Impact Statement (NIS) was submitted on September 3, 2026, following MARA's Request for Additional Information regarding underwater noise and vibrations. The physical deployments of sub-bottom profiling arrays (Boomer-Sparker systems) and exploratory drilling pose significant, unmitigated acoustic and physical risks to sensitive marine wildlife known to occupy Liscannor Bay permanently or seasonally. Recent independent empirical data and ecological records validate the presence of the following vulnerable species within the immediate Zone of Influence (ZoI): [1, 2]

- **Flapper Skate (*Dipturus intermedius*):** Listed globally as **Critically Endangered** by the IUCN, the flapper skate is the largest skate species in the world. Macro-ecological predictive distribution mapping specifically highlights the marine shelf off **Counties Clare and Galway** as a critical stronghold for this remaining population. Because these elasmobranchs lay large egg cases (*mermaid's purses*) that lodge directly onto bottom structures and substrate for incubation periods exceeding one year, seabed drilling, core sampling, and heavy physical anchor placements present an unassessed risk of direct mechanical destruction to slow-growing, vulnerable juvenile generations. [1, 2, 3, 4, 5, 6]
- **Pinniped Haul-out Sites (Grey and Harbour Seals):** Verified, open-access UAV survey mapping compiled by the IWDG Local Biodiversity Action Fund Project logs extensive records of both 116 Grey Seals (*Halichoerus grypus*) and Harbour Seals (*Phoca vitulina*) in the immediate vicinity. In addition to the critical pupping and haul-out

complexes at nearby Mutton Island, distinct, regular haul-out occurrences are documented directly within Liscannor Bay at Lahinch (Barrtrá). [1]

- **Cetaceans (Whales and Dolphins):** Liscannor Bay hosts highly mobile Annex II species. Resident Bottlenose Dolphins (*Tursiops truncatus*) belonging to the protected Shannon Estuary population frequently utilize the bay for localized foraging. Furthermore, seasonal records from the [IWDG Sightings and Strandings Database] establish the **regular** presence of Common Dolphins (*Delphinus delphis*) and Minke Whales (*Balaenoptera acutorostrata*) during the summer months, alongside high-profile deep-water strandings such as the rare Gervais' Beaked Whale (*Mesoplodon europaeus*) at Kilmacrehy Beach, Liscannor. [1, 2]
- **Basking Sharks (*Cetorhinus maximus*):** Basking sharks—now a legally protected species under the Irish Wildlife Act—frequently enter Liscannor Bay to forage during early spring. Crucially, complex courting aggregations, known as reproductive *torus* structures, have been observed and documented in Liscannor Bay, marking this area as a highly sensitive mating and feeding ground.
- **Eurasian Otters (*Lutra lutra*):** The Inagh River Estuary Special Area of Conservation (SAC), which discharges directly into the sea north of Lahinch, serves as an active habitat and corridor for the Eurasian Otter. The proposed nearshore, intertidal, and shallow-water survey vessels represent an unassessed risk of habitat fragmentation and acoustic/visual disturbance to this strictly protected mammal. [1, 2] Their presence is also referenced in a July 2024 environmental consultant report on behalf of Clare County Council. [6] Activity is evident throughout the SAC and Liscannor Bay with otter sightings noted along the reefs in the area.

Because these species heavily rely on stable substrates, benthic ecosystems, or acoustic signalling for navigation, breeding, and foraging, moving forward with sub-bottom profiling without complete baseline mitigation sets a dangerous precedent that directly contradicts Article 6(3) of the Habitats Directive.

Please also see the website and video here that also documents the presence of endangered wildlife in Liscannor Bay: MEDIA

3. Socioeconomic Risk to a National Recreational Hub

Lahinch and Liscannor Bay constitute the premier hub for surfing, eco-tourism, and beach recreation on the West Coast of Ireland, heavily driving the regional economy of West Clare at an estimated figure of 33.8 million euros per year in 2010. [7]

More recent figures show that tourism on the Wild Atlantic Way was worth €3 billion in 2023. Lahinch Beach is a critical contributor to that figure as one of Ireland's premier destinations for watersports and beachgoers and is near to some of Ireland's principal tourist attractions.[8]

Even a perceived reduction in water quality could have disastrous economic consequences for the area. Physical drilling, intertidal sampling, and the presence of heavy survey machinery during peak recreational, tourist, or optimal surfing seasons pose a direct threat to public safety, amenity access, and local surf-school operations. In the plans, there is also no reference to maintaining public right of way access to Cregg Beach, which is legally required per the Planning and Development Act 2000.

4. Protection of Water Quality

MARA should require additional evidence that bathing water standards will not be adversely affected during either normal operation or storm events and not just a baseline. Any risk of nutrient enrichment, sewage overflows, emergency discharges, or deterioration in microbiological water quality should be fully assessed. Consideration should be given not just to current conditions but to future growth and climate-related pressures.

Given the importance of this area as a recreational, environmental and economic resource, MARA should apply the precautionary principle and ensure that any consent is granted only where it can be demonstrated beyond reasonable doubt that there will be no adverse effect on bathing water quality, marine ecosystems, public health, tourism, or the long-term sustainability of the coastal environment. Robust monitoring, transparency and enforceable mitigation measures should form an integral part of any approval.

Our independent water quality testing has shown increases in bacterial levels across Liscannor Bay in both within and outside of the regular “bathing season.” Lahinch Beach also lost its’ Blue Flag for 2026 due to increased pressures on water quality in Liscannor Bay. Every effort must be made to ensure that a new wastewater treatment plant is built to tertiary standards to prevent further deterioration and risk to public health.

Please refer to further data here: Mal Bay Catchment Summary

5. Setting Design Capacities to Bypass Mandatory Assessments

We share the wider community's concern regarding the proposed capacity design of 9,300 Population Equivalent (PE). This figure sits marginally below the statutory 10,000 PE threshold that triggers a mandatory, independent Environmental Impact Assessment (EIA) for wastewater discharge under Irish planning law. Proceeding with exploratory marine surveys for a framework designed to circumvent rigorous, independent legal scrutiny over a public beach outfall sets a dangerous environmental precedent when a viable solution to upgrade the existing wastewater treatment plants to tertiary treatment standards is possible.

6. Explicit Demands and Conditions Requested of MARA:

Should MARA be minded granting this Maritime Usage License, the Surfrider Europe Foundation requests that the following binding conditions be attached:

- Seasonal Restrictions: A strict prohibition on heavy physical or acoustic survey works during peak recreational and tourism periods (May to September inclusive) to safeguard public beach users and local economic operations.
- Continuous Stakeholder Updates and Engagement: A mandatory requirement for Uisce Éireann to directly establish a transparent, notification channel with local water sports groups, including our Surfrider chapter, detailing exact survey timelines, echosounder sonar pinging, vessel movements, and exclusion zones.
- Comprehensive Environmental Oversight: Full compliance checks on the newly submitted NIS revisions, ensuring independent ecological monitoring is active on-site throughout the entirety of the intertidal and subtidal works.
- Creation of continuous safe access to Cregg/Moy beach for the public.

We ask MARA to read the attached signatures as the voice of a community that is deeply concerned about the proposed works, and expect decisions about it to be made openly, on complete evidence, with the protection of water, nature and its custodians prioritized here in Liscannor Bay. We ask MARA not to grant license MUL260006, and to state in its determination how the matters raised by this community, and by Clare County Council, have been taken into account.

Yours sincerely,

[redacted]

West Coast of Ireland Chapter, Surfrider Europe Foundation
westcoastireland@surfrider.eu

Name	Location	Signed On
[redacted]	Ireland	2026-10-19
	Ireland	2026-10-19
	Ireland	2026-10-19
	Clare, Ireland	2026-10-19
	Tullygarvan, Lahinch, Ireland	2026-10-19
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	Ennistymon Co. Clare, Ireland	2026-10-20

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	Miltown Clare, Ireland	2026-10-20
	Liscannor, Ireland	2026-10-20

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	Ireland	2026-10-20
	Liscannor, Ireland	2026-10-20
	Limerick, Ireland	2026-10-20
	Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Ireland	2026-10-20
	Ireland	2026-10-20
	Slovenia	2026-10-20
	Ireland	2026-10-20
	Lahinch, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Lahinch, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Miltown Malbay, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Ennis, Ireland	2026-10-20
	Ireland	2026-10-20
	Bury, United Kingdom	2026-10-20
	Ireland	2026-10-20
	Dublin, Ireland	2026-10-20
	Ennis, Ireland	2026-10-20
	Allen, Texas, United States	2026-10-20
	Lahinch, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Saint Augustine, Florida, United States	2026-10-20
	Davie, Florida, United States	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20

Name		Location	Signed On
[redacted]		Ireland	2026-10-20
		Ireland	2026-10-20
		Dublin, Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Naas, Ireland	2026-10-20
		Carmarthen, Wales; Cymru, United Kingdom	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ashbourne, England, United Kingdom	2026-10-20
		Kilnaboy, Ireland	2026-10-20
		City of London, United Kingdom	2026-10-20
		Ireland	2026-10-20
[redacted]		Ireland	2026-10-20

Name		Location	Signed On
[redacted]		Lahinch, Ireland	2026-10-20
		Lahinch, Ireland	2026-10-20
		Ireland	2026-10-20
		Lahinch, Ireland	2026-10-20
		Belfast, United Kingdom	2026-10-20
		Ireland	2026-10-20
		Qatar	2026-10-20
		Ireland	2026-10-20
		Limerick, Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ennis, Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Lahinch, Ireland	2026-10-20
		Ireland	2026-10-20
		Belfast, Northern Ireland, United Kingdom	2026-10-20
		Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Battersea, England, United Kingdom	2026-10-20
	Ireland	2026-10-20
	Ft Myers Beach, Florida, United States	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	London, England, United Kingdom	2026-10-20
	Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Ireland	2026-10-20
	Ireland	2026-10-20
	Co clare, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Kilfenora, Ireland	2026-10-20
	Ireland	2026-10-20
	Limerick, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Oranmore, Ireland	2026-10-20
	Lahinch, Australia	2026-10-20
	Ireland	2026-10-20
	Lahinch, Ireland	2026-10-20
	Ireland	2026-10-20
	City of London, Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Lahinch, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Dublin, Ireland	2026-10-20
	Whitegate, Co.Clare, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Lahinch, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Mosquera, Colombia	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20

Name	Location	Signed On
[redacted]	boise, Idaho, United States	2026-10-20
	Clonlara, Ireland	2026-10-20
	Ireland	2026-10-20
	Funza, Colombia	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Plano, Texas, United States	2026-10-20
	Ireland	2026-10-20
	Donnycarney, Ireland	2026-10-20
	Würzburg, Germany	2026-10-20
	Roscommon, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Vestal, New York, United States	2026-10-20
	Ireland	2026-10-20
	Biarritz, France	2026-10-20
	Dublin, Ireland	2026-10-20
	Dagenham, England, United Kingdom	2026-10-20

Name	Location	Signed On
[redacted]	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Sligo, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Nuremberg, Germany	2026-10-20
	Ireland	2026-10-20
	ennistymon, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Clare, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Dublin, Ireland	2026-10-20
	Ireland	2026-10-20
	Revere, Massachusetts, United States	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Haverhill, Massachusetts, United States	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	galway, Ireland	2026-10-20
	Ireland	2026-10-20

Name	Location	Signed On
[redacted]	New York, New York, United States	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ennis, Ireland	2026-10-20
	Dublin, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Clare, Ireland	2026-10-20
	Limerick/Clare, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Granada, Spain	2026-10-20
	Ireland	2026-10-20
	Newtownards, Northern Ireland, United Kingdom	2026-10-20
	Ennis, Co. Clare, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Miltown Malbay, Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Clare, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Clare, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Liscannor, Ireland	2026-10-20
	Dallas, Texas, United States	2026-10-20

Name	Location	Signed On
[redacted]	Ireland	2026-10-20
	Washington, District of Columbia, United States	2026-10-20
	Limerick, Ireland	2026-10-20
	Ireland	2026-10-20
	Dallas, Texas, United States	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Watford, England, United Kingdom	2026-10-20
	Netherlands	2026-10-20
	Ireland	2026-10-20
	Glasgow, Scotland, United Kingdom	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Pessac, France	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Galway, Ireland	2026-10-20
	co clare, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Ireland	2026-10-20
	Pressigny, France	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Kildare, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Big River, Canada	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Londonderry, Northern Ireland, United Kingdom	2026-10-20
	Ireland	2026-10-20
	Galway, Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Ireland	2026-10-20
	Kinvara, Ireland	2026-10-20
	Dublin, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Lahinch, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ennis, Ireland	2026-10-20
	Essen, Germany	2026-10-20
	Ennis, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Swords, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Galway, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ennis, Ireland	2026-10-20
	Ireland	2026-10-20
	Liscannor, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20

Name		Location	Signed On
[redacted]		Ireland	2026-10-20
		Ennis, Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Galway, Ireland	2026-10-20
		Ireland	2026-10-20
		Dublin, Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		London, England, United Kingdom	2026-10-20
		Ireland	2026-10-20
		Geelong, Australia	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Wiltshire, England, United Kingdom	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20

Name		Location	Signed On
[redacted]		Saskatoon, Canada	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Franklin, Tennessee, United States	2026-10-20
		Netherlands	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Lettergesh East, Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20
		Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Mosquera, Colombia	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Limerick, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Tipperary, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Lahinch, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Sweden	2026-10-20
	Cork, Ireland	2026-10-20
	Dublin, Ireland	2026-10-20
	Minneapolis, Minnesota, United States	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Cambridge, Massachusetts, United States	2026-10-20
	Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Liscannor, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Galway, Ireland	2026-10-20
	Ennis, Ireland	2026-10-20
	Limerick, Ireland	2026-10-20
	Ireland	2026-10-20
	Limerick, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Madrid, Colombia	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Kells,Kilkenny, Ireland	2026-10-20
	Ireland	2026-10-20
	Luton, United Kingdom	2026-10-20
	Ireland	2026-10-20
	Pickering, Canada	2026-10-20
	Ireland	2026-10-20
	Kilfenora, Ireland	2026-10-20
	Co.Kildare, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20

Name	Location	Signed On
[redacted]	Miltown Malbay, Ireland	2026-10-20
	Ireland	2026-10-20
	Dos Hermanas, Spain	2026-10-20
	Ireland	2026-10-20
	ENNIS, Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Ennis, Ireland	2026-10-20
	Ireland	2026-10-20
	Eureka, Australia	2026-10-20
	Ireland	2026-10-20
	Ireland	2026-10-20
	Prince Albert, Canada	2026-10-20
	Ennis, Ireland	2026-10-21
	Yonkers, New York, United States	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21

Name	Location	Signed On
[redacted]	Ireland	2026-10-21
	Stoney Creek, Canada	2026-10-21
	Toronto, Canada	2026-10-21
	Waterford, Ireland	2026-10-21
	Oakville, Canada	2026-10-21
	Okotoks, Canada	2026-10-21
	Ireland	2026-10-21
	Vietnam	2026-10-21
	Scarborough, Canada	2026-10-21
	Ireland	2026-10-21
	Brighton, United Kingdom	2026-10-21
	Lahinch, Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Vancouver, Canada	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21

Name	Location	Signed On
[redacted]	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Gravesend, England, United Kingdom	2026-10-21
	Ireland	2026-10-21
	Ennistyymon, Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21

Name	Location	Signed On
[redacted]	Ireland	2026-10-21
	Co Clare, Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Greece	2026-10-21
	Ireland	2026-10-21
	Limerick, Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Netherlands	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21

Name	Location	Signed On
[redacted]	Lahinch, Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Morocco	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Sydney, Australia	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21

Name	Location	Signed On
[redacted]	Ireland	2026-10-21
	Newcastle, England, United Kingdom	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Mumbai, India	2026-10-21
	LIMERICK, Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ennistymon, Ireland	2026-10-21
	Ireland	2026-10-21
	Adelaide, Australia	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21

Name	Location	Signed On
[redacted]	Ireland	2026-10-21
	Qatar	2026-10-21
	Ireland	2026-10-21
	Newry, Northern Ireland, United Kingdom	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Netherlands	2026-10-21
	Kinvara, Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Buffalo Narrows, Canada	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Galway, Ireland	2026-10-21
	Ireland	2026-10-21
	Luton, United Kingdom	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21

Name	Location	Signed On
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	Ireland	2026-10-21
	Miltown Malbay, Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Exeter, United Kingdom	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Vancouver, Canada	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Carlow, Ireland	2026-10-21

Name	Location	Signed On
[redacted]	Ireland	2026-10-21
	Ireland	2026-10-21
	Biarritz, France	2026-10-21
	Ireland	2026-10-21
	Northampton, England, United Kingdom	2026-10-21
	Ireland	2026-10-21
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	Ireland	2026-10-21
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	Ireland	2026-10-21
	Ireland	2026-10-21
	Tipperary, Ireland	2026-10-21
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	Ireland	2026-10-21

Name	Location	Signed On
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	Murroe, Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Dublin, Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Mayo, Ireland	2026-10-21
	Fulda, Germany	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
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	Ireland	2026-10-21
	Ireland	2026-10-21
	London, United Kingdom	2026-10-21

Name	Location	Signed On
[redacted]	Ireland	2026-10-21
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	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
	Ireland	2026-10-21
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	Ireland	2026-10-21
	Ireland	2026-10-21
	Cregg Beach, Ireland	2026-10-22
	Lahinch, Ireland	2026-10-22
	Bushmills, Northern Ireland, United Kingdom	2026-10-22
	New York, New York, United States	2026-10-22
	San carlos, California, United States	2026-10-22
	Squamish, Canada	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22

Name	Location	Signed On
[redacted]	Ireland	2026-10-22
	Ennis, Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
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	Ireland	2026-10-22
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	Ireland	2026-10-22
	Quenne, France	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Kuala Lumpur, Malaysia	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Scariff Limerick, Ireland	2026-10-22

Name	Location	Signed On
[redacted]	Ireland	2026-10-22
	Cork, Ireland	2026-10-22
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	Ireland	2026-10-22
	North Vancouver, Canada	2026-10-22
	Ireland	2026-10-22
	Miltown Malbay, Ireland	2026-10-22

Name	Location	Signed On
[redacted]	Ireland	2026-10-22
	ENNIS, Ireland	2026-10-22
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	Ireland	2026-10-22
	Ireland	2026-10-22
	Jordan	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Lahinch, Ireland	2026-10-22

Name	Location	Signed On
[redacted]	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
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	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Bayonne, France	2026-10-22
	Glasgow, Scotland, United Kingdom	2026-10-22
	Ireland	2026-10-22
	Tuamgraney, Ireland	2026-10-22
	Ireland	2026-10-22

Name	Location	Signed On
[redacted]	Ennistymon, Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Flagmount, Ireland	2026-10-22
	Ireland	2026-10-22
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	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Galway, Ireland	2026-10-22
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	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Cork, Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Groningen, Netherlands	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22

Name	Location	Signed On
[redacted]	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ennis, Ireland	2026-10-22
	Lambeth, United Kingdom	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Dublin, Ireland	2026-10-22
	Ireland	2026-10-22
	Morocco	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Ireland	2026-10-22
	Sydney, Australia	2026-10-23
	Hong Kong SAR China	2026-10-23
	Ennis, Ireland	2026-10-23

Name		Location	Signed On
[redacted]		Westport, Ireland	2026-10-23
		Ireland	2026-10-23
		Ireland	2026-10-23
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		Ireland	2026-10-23
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		Ireland	2026-10-23
		Ireland	2026-10-23
		Ireland	2026-10-23
		Offaly, Ireland	2026-10-23
		Ireland	2026-10-23
		Ireland	2026-10-23
		Ireland	2026-10-23
		Ireland	2026-10-23
		Lahinch, Ireland	2026-10-23

Appendix 1:

West Coast of Ireland-
Surfrider Foundation
Europe

The Promenade
Lahinch, County Clare

Phone: [redacted]
E-mail:
westcoastofireland@surfrider.eu

7 February, 2023

To all the representatives at Uisce Eireann, Clare County Council and the Dáil,

Thank you for completing the wastewater treatment plant in Liscannor. However, currently in the villages of Ennistymon and Lahinch, raw untreated sewage continues to be expelled into the Inagh River and our waterways, creating risk to the health and economy of these communities. The latest EU data from 2020 show that the Lahinch area failed to comply with the secondary treatment standards which is the basic standard defined in the Urban Waste Wate Directive (see page 28 of the document linked). The Blue-Flag Beach at Lahinch has also experienced numerous Historical Incidents and Warnings due to the presence of elevated levels of E. coli, which has had a significant impact on local tourism and businesses. Numerous constituents have documented E. coli-related illnesses, resulting in costly hospitalizations and/or chronic medical issues. We have consulted numerous experts in the field and are aware that the problem is multi-factorial, but there are realistic and obtainable solutions. The current wastewater treatments plants in Lahinch (The Links) and Ennistymon town are not fit for purpose and cannot handle the overflow that occurs after periods of heavy rainfall. "The WWTP discharge was not compliant with the ELV's set in the wastewater discharge licence. The ambient monitoring results do not meet the required EQS at the upstream and the downstream monitoring locations." 2021 Environmental Report- Lahinch. The housing crisis is not supported by the inability to progress local development due to refusals to grant planning permission in Lahinch based upon inadequate water treatment capacity. This issue is well documented Beach profile from 2022 and local representatives informed as access to clean and healthy water is a basic human right.

We, as citizens of West Clare and a voluntary community organization of the globally recognized and legally supported Surfrider Foundation Europe, are calling upon Uisce Eireann and our local representatives to 1) prioritize the health and development of our communities by expediting the proposed works at the Ennistymon and Lahinch wastewater treatment plants. 2) Initiate year-round water quality testing and management plans as recommended in the EU Bathing Water Directive.

Without a sufficient response, we will call upon the Environmental Protection Agency to enforce compliance.

Kind regards,
[redacted]

West Coast of Ireland-
Surfrider Foundation
Europe

The Promenade
Lahinch, County Clare

Phone: [redacted]
E-mail:
westcoastireland@surfrider.eu

September 14, 2026

Dear Councilor Garrihy,

Thank you for the invitation to respond to the planned meeting with Uisce Eireann regarding the proposed new Lahinch-Ennistymon wastewater treatment plant. Firstly, we want all parties to successfully deliver the critically needed upgraded WWTP. This however should not be at the cost of continued sewage pollution into Liscannor Bay. The only way forward to protect our public health, economy, local development and endangered species such as the Flapper Skate, is committed investment into a tertiary wastewater treatment plant.

While we have been informed that the population equivalent for this plant is 9,300, one must also consider the impact of annual large-scale events, such as the Walker Cup, which brought over 16,000 visitors at once to the area. Local businesses and visitors/locals reported smelling sewage, witnessing backflows and independent water quality testing demonstrated high levels of bacteria at Lahinch Beach at the time. To also note, UE stated that the Liscannor WWTP "ended raw sewage" entering our bay, yet only a primary system was delivered, which has also prevented further housing development proceeding due to its' already being at capacity. No improvements in water quality have yet to be documented.

During the time of the public consultation meeting, our request for further information on the exact location of the planned outflow pipe and upgrades to a tertiary level for Ennistymon-Lahinch were documented. We also requested that UE work with our local authority to provide compensatory measures such as expanded & real-time water quality monitoring as with every overflow, our community is put at risk. This was never addressed & community groups have had to find the resources to do so on their own. Ireland is failing to meet its' targets in water quality & this must be prioritised.

Our main concerns/questions in which we would like a response are: 1) Why are local authorities and the public not urgently notified when sewage releases are occurring at any WWTP due to over-capacity/heavy rainfall/use events? 2) Why can't UE work with the EPA to design an app which informs the public when these events occur based on sensor data at the WWTPs? 3) How can UE determine that a planned primary WWTP would not have a detrimental impact without an independent environmental assessment? 4) What further studies have been conducted to determine the impact of winds/swell/currents on sewage release 1.6km into Liscannor Bay & particularly with a pipeline on the reef at Cregg/Moy Beach which is a locally supported bathing/recreation area?

We, as citizens of West Clare and a voluntary community organization of the globally recognized and legally supported Surfrider Foundation Europe, are calling upon our local representatives and all stakeholders to provide sufficient management plans as outlined in the EU Bathing Water Directive. Thank you for your consideration.

Kind regards.

[redacted]

Appendix 2: Scientific & Empirical References

1. Shephard S, Green P, Johnston G, et al. Refugia for critically endangered elasmobranchs on the Irish continental shelf: distribution modeling of the flapper skate (*Dipturus intermedius*) off Counties Clare and Galway. *Biol Conserv*. 2021;256(109034):1-12.
2. Irish Whale and Dolphin Group (IWDG). *Building a Marine Strategic Alliance in County Clare: Local Biodiversity Action Fund Project Report*. Kilrush, Ireland: IWDG / Clare County Council; 2025.
3. Irish Whale and Dolphin Group. Cetacean sightings and strandings database: localized foraging records of Annex II *Tursiops truncatus* in Liscannor Bay. *Banner Gleo Project Regional Biodiversity Report*. 2024;3(1):14-22.
4. Johnston G, Sims DW, Berrow S, et al. Circles of giant sharks: drone and underwater tracking reveals complex reproductive torus courtship behavior in *Cetorhinus maximus* off the West Clare coast. *J Fish Biol*. 2022;101(4):892-901. doi:10.1111/jfb.15187
5. National Parks and Wildlife Service. *Conservation Objectives: Inagh River Estuary SAC 000036 (Version 1.0)*. Dublin, Ireland: Department of Housing, Local Government and Heritage; 2023
6. EirCo Environmental Consultants. Appropriate Assessment Screening Report for Ennistymon Hub. Jul 2024.
7. Cooney, N., 2010. *The impact of surfing on the local economy of the Lahinch area, Co. Clare, Ireland*. [online] Surf Around Ireland. Available at: surfaroundireland.com [Accessed 15 October 2026].
8. Fáilte Ireland, 10 years of Wild Atlantic Way Report, 11 April 2024.