West Coast Surf Club
c/o Lahinch Surf Shop
Lahinch
Co Clare

25th October 2026

Maritime Usage Licensing,
Maritime Area Regulatory Authority,
2nd Floor, Menapia House,
Drinagh Business Park,
Drinagh,
Wexford, Y35 RF29

licence@mara.gov.ie

Ref: MUL260006 – Marine Survey License application for proposed Wastewater Treatment Plant at Cullaragh, Co Clare

Dear Sir / Madam

On behalf of the West Coast Surf Club, based in Lahinch, Co Clare, we wish to lodge the following submission with regards to the proposed Marine Survey License at the south east end of Liscannor Bay, Co Clare.

Background: Through its members, WCSC have been surfing and enjoying the near perfect surf conditions on the natural reefs and beach areas within Liscannor Bay for generations. It remains a unique resource with favourable access, environment and bathymetry which has drawn people from not only all parts of Ireland but also from all over the world. While the economic benefits of surfing in and around Lahinch, Co Clare are well known, the social environmental and cultural residuals are just as important. Nowhere is this more keenly felt than the waves stretching along the natural reefs from the southern end of the main beach all the way towards Rinneen but particularly in the area around Cregg Beach (or Moy Beach as it is often known).

The WCSC have operated closely with and fully support the findings and recommendations of the **Calluragh Cregg Lahinch Wastewater Action Group (CCLWAG)** and we fully support their key message that any proposed

wastewater treatment facility should follow the 'Right Plant. Right Process. Right Place.' approach.

We note that the main SISAA and NIS document, prepared by AQUAFACT on behalf of Uisce Eireann does not include impact or potential restrictions on the surfing environment under the key potential impact mechanisms in Section 2.6 as a result of any proposed site investigation works, again repeated in Section 2.7. This relates in particular to Area A of the proposed works. In this regard, we cannot agree with the Conclusion in Section 2.7.8 as the report has not considered all water users and stakeholders in its assessment.

While the use of the SPR (Source Pathway Receptor) model is welcomed in terms of simplicity and efficiency, it is undermined when all Receptors are not considered. There appears to have been no consultation with the surf community, beyond the open public engagements, to seek to identify how this Receptor group may be impacted. As noted above, generations of surfers have accessed the waves in and around Cregg Beach for decades. We are not shore based stakeholders but rather use a significant portion of the Area A throughout the year. Surfers would regularly be in the surf zone which could be hundreds of meters from the shore, this puts our group right in the middle of the proposed survey zone, the references Zone of Impact, however there has been no recognition of this to date.

This initial application for a Marine Survey License, MUL260006, is of significant concern to not only our members but a wide number of surfers and other water users. The Risk Register notes that surveys will be Q4 26 to Q1 27 but a total of 24 months is being sought. It is not reasonable to identify such an extensive period without first assessing impacts on the human users of the areas affected. Any license should be on a specific period, should issues arise, a review, extension or other should be sought by the applicants.

In conclusion, no assessment on water users, and surfers in particular, nor proposed mitigation measures have been set out in the supporting

documentation for this license application. In this regard, no licence should be granted without adequate stakeholder engagement. Only then, can the precise details and impacts of any proposed survey works, access restrictions to shore areas or water zones be reviewed.

On a wider note and as noted above, the WCSC do not support the proposed wastewater treatment plans as currently proposed. We remain fully supportive of the **Calluragh Cregg Lahinch Wastewater Action Group (CCLWAG)** and encourage the relevant bodies to reconsider the current proposals.

Regards

[redacted] Environmental Officer
& [redacted], Chair
West Coast Surf Club