Bathing recreation and water quality surveys

To the Maritime Area Regulatory Authority
Application MUL260006
From [redacted]
Date 23/10/26

Postal address [redacted]
Email [redacted]

Dear Sir or Madam,

I live just over 1 klm from Cregg Beach and can hear the waves from my back door.

I have been incredibly lucky to have the ocean and surrounds on my doorstep and I created an Ecotourism Business www.wildkitchen.ie based around nature, Seaweed and wild food. I have taken people from all over the world since 2014 on seaweed and wild food walks along the coast at Cregg and Barrtra.

We have worked with Failte Ireland, the Burren Ecotourism Network and the Burren Unesco Global Geopark to promote the culinary, nutritional and historical value of seaweed, which was once a thriving industry along the coast here. We are hoping to slowly grow the hand harvesting industry again, promote the sustainable harvesting of seaweed and continue our work with students, chefs, and people from all walks of life. In order to do this, we need and expect clean sea water.

Ireland is one of the best places in the world for seaweed and I harvest up to 16 different varieties through the seasons. It is a highly sought after and nutritional regenerative food that requires clean salt water to grow in and is very susceptible to water pollution and effluent, soaking up nitrogen, while changing the health of coastal habitats they rely on.

I believe food is medicine, and along with it's culinary uses, local people here have gathered and used seaweed for it's high vitamin and mineral content for cough remedies and general good health properties. Also, for bathing and treatment of skin problems over the years.

Locals at Cregg were once paid for collecting Kelp after the Spring tides, which was transported to

Nearby Kilrush for processing into animal feed and iodine. It is a hugely important part of our living heritage and deserves recognition and protection.

My concerns not only focus on the effects of this invasive survey on the shore line where Nori and seagrass grow, but the long term effects of having effluent piped into Cregg, effectively putting an end to my business and depriving the many people who forage there of this cherished historical tradition .

I ask MARA to require a published water quality survey protocol and clear measures for protecting people using Lahinch and Liscannor Bay during the investigations. The evidence gathered should be suitable for the decisions it is intended to inform.

The Council observation

Clare County Council's letter of 17 April 2026 supports improved wastewater treatment while emphasising the importance of recreational water quality. It states that secondary treatment does not guarantee water quality suitable for human health and calls for an adequate final effluent standard. It also questions the restrictive Area A and raises investigation further into the bay because of the shallow Cregg shelf and possible lack of mixing. These are questions about the adequacy of the investigations, not a finding that the survey licence authorises a particular outfall.

The Council describes the area as "frequently used by surfers, swimmers and general recreational use". The EPA classified Lahinch bathing water as Excellent for 2022 to 2024 and Good for 2025. Cregg Beach was nominated by members of the public in Clare County Council's Identification of Bathing Waters 2027 process, which closed on 25 September 2026. The applicant's own consultation record notes a surf school's concerns about "sand flow and beach usability" (MAC application form, section 8.1).

The sampling proposal

The applicant response of 26 June 2026 proposes water quality surveys over a full spring and neap tidal cycle to inform dispersion modelling, with sampling near a potential diffuser and nearshore within Area A. It describes sondes and/or Niskin bottles and leaves numbers and timings to optimisation. That passage does not set out the microbiological endpoints, laboratory methods or event coverage needed to explain how the Council's human health concern will be addressed.

Use of the water during surveys

Vessels, survey equipment and shore investigations may interact with recreational use. The submission seeks a clear plan for managing those interactions.

The modelling assurance and its evidential basis

MARA's MAC260002 report, finalised 18 June 2026, reproduces Uisce Éireann's assurance that completed modelling indicated no impact on Lahinch bathing water or Cregg Beach, then accepts the preparatory work as satisfactory (printed page 16, criterion 9). That passage records no examination of the modelling itself. MARA's AIE decision AIE_006_2026 of 5 October 2026 states that it holds no underlying modelling, plume or dispersion records. The recorded acceptance rests on the applicant's assurance without a documented review of the modelling. MARA should explain what evidence it reviewed and distinguish any earlier model from modelling to be informed by these surveys.

Action requested from MARA

1. Publish sampling locations, depths, frequency, timetable, analytes including E. coli and intestinal enterococci, laboratory methods and quality assurance. Explain how the programme addresses the Council's human-health concern and supports dispersion modelling.

2. Provide summer sampling as well as justified winter and event coverage, explaining the treatment of tides, rainfall and river flow. State the assumed effluent quality and distinguish the provisional programme from the full 24 month licence window.

3. Give a documented response to the Council's request concerning the extent of investigations and mixing conditions beyond the shallow shelf.

4. Provide advance notices and a practical public safety plan covering vessel movements, equipment, exclusion areas and shore access. Specify contact details and incident reporting.

5. State how survey data and modelling assumptions will be made available for scrutiny in any subsequent outfall assessment.

6. Explain what modelling MARA reviewed when accepting the assurance in the MAC report, whether that modelling is relied upon for MUL260006 and how the new sampling relates to it. Confirm that the modelling and its assumptions will be published with any planning application, as the applicant stated in its MAC application (section 7.1).

For many of us, the water at Lahinch and Cregg is part of everyday life, in winter as well as summer. We want clean water as much as anyone, and we support better wastewater treatment.

What I ask is that the evidence gathered now is good enough to protect the people who use this bay, that what is essential is obtained before the decision, and that MARA explains in the determination how it has satisfied itself of that.

I ask that if the scientific evidence does not support this application then in all good conscience you must deny this survey licence.

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

Yours faithfully,
[redacted] /Forager/Ecotourism provider

Sources supporting this submission

Clare County Council observation, letter dated 17 April 2026. Both pages, treatment, human health and survey extent.

Applicant response to further information, 26 June 2026. Page 8, response on water quality surveys.

Revised SISAA and Natura Impact Statement, August 2026. Section 2.2, proposed survey activities.

MARA MAC report MAC260002, final report 18 June 2026. Printed page 16, Schedule 5 criterion 9. Supporting decision: AIE_006_2026, 5 October 2026, attach a copy of the decision.

Applicant Attachment 4.5, consistency with Water Framework Directive objectives. Page 3, sediment assumptions.

Applicant response to further information, 26 June 2026. Pages 8 and 11, vessel transit and crew-transfer speeds.

MAC260002 application form (Form MAC1), 8 January 2026, sections 7.1 and 8.1, released under AIE_006_2026.

EPA bathing water classifications for Lahinch, 2022 to 2025; Clare County Council, Identification of Bathing Waters 2027.