Seals cetaceans and underwater noise

To the Maritime Area Regulatory Authority
Application MUL260006

[redacted] Ecotourism Provider/Owner Wild Kitchen/Tutor
22/10/26

[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 lived in this little cottage longer than I have lived anywhere else and my 3 boys know

Callura, the surrounding fields and Cregg beach as their home and it always will be. It is a very special place and holds many happy memories of family beach days, leaning to swim, catching fish, foraging seaweed and coastal plants and sometimes being just a place to escape to for a glorious walk along the shore to take in the beauty and wonder of this little cove on the west coast of Co.Clare.

I have been a nature lover all my life, self-taught from an early age and then as student of Organic Horticulture and country side management, delivering training on same and in the last 6 yrs as a tutor of Biodiversity for tourism online to destinations and organizations all over Ireland.

I also study Ecoliteracy and have become a passionate advocate and defender of nature, through many projects.

I believe we are a guest of nature and that it has equal rights like we do.

It is my go-to happy place, nourishing, calming and full of wonder and joy.

Known more recently as Blue space which has been proven to have many positive health benefits.

I feel a certain connection to the creatures and plants that make Cregg beach their home and have studied and photographed them for many years. In particular I have stood silent witness to a family of seals that live at Cregg and Barrtra for many years, as I go about my weekly walks collecting and identifying seaweed.





The seals haul-out here and have become almost trusting of my presence, feeding their young, warming up on the rocks or feasting on the rich pickings beneath them. This is their home, their safe place and refuge where they feel protected and are thriving because of it.

Thankfully a spotlight has been shone on this special area capturing info about these fragile and important creatures along with many others in Liscannor Bay in the last few years.

Building a Marine Strategic Alliance in County Clare,

With support from the **Local Biodiversity Action Fund** (National Parks and Wildlife Service) and Clare County Council, a collaboration between the long-established **Irish Whale and Dolphin Group** with its head office in Kilrush, and the newly formed **Banner Gleo**, which is working with the local community to support the natural capital and ecological integrity of Liscannor Bay, aims to build knowledge and share experiences of this popular marine space.

‘’With in Liscannor Bay there are marine protected areas (MPA) including the **Inagh River Estuary SAC** which flows westwards entering the sea north of Lahinch and the Cliffs of Moher SPA, with seeks to protect six breeding seabird species and the Chough. To the south lies the **Mid-Clare Coast SPA**, with wintering geese and waders and breeding cormorants protected species. ‘’In addition, seals, both grey and harbour are known to haul out regularly at Mutton Island which is also a known pupping site, but also at Lahinch (Barr Trá) and even at historically Hags Head. Bottlenose dolphins, which are part of the Shannon estuary population, are frequently recorded in the bay and common dolphin and minke whale during the summer. Basking sharks are increasingly seen foraging during early spring and in recent years courting aggregations, or torus, have been observed west of Liscannor Bay.’’

https://iwdg.ie/building-a-marine-strategic-alliance-in-county-clare/

I am hugely concerned about a number of issues in the revised NIS report regarding these creatures and from my research I have learned that seals are particularly susceptible to any sort of disturbance, physical or underwater from noise and can even flush out when a small drone is near as in the IWDG recent survey of seals in 2025.

https://maps.biodiversityireland.ie/Dataset/441/Survey/1820

(See national seal census results below)

I ask MARA to require an assessment of underwater noise which addresses the actual acoustic equipment, current evidence of marine mammal use of Liscannor Bay and the practical limits of the proposed mitigation. This concerns disturbance from the survey works covered by MUL260006.

The 2025 seal evidence

The revised NIS, printed page 44, describes no established haulout or core resting areas in Liscannor Bay and infrequent sightings. The NBDC Liscannor Bay Seal Surveys 2025 metadata describes six surveys between June and September, using UAV imagery over known or suspected haulout sites, with binocular surveys at some locations including Bar Trá and Coolrone. It contains 116 records covering two species. These are records, not 116 individual seals. The applicant should analyse the results and reconcile them with its description of local use.

The NIS acknowledges the 2025 Liscannor Bay Seal Surveys (116 records at known haul-outs) but does not analyse them. The Annex IV report also relies on 2017/18 national seal counts, although the 2024 national census (NPWS, Irish Wildlife Manuals No. 158) had been published and recorded the highest harbour seal count yet for the area that includes the project. The seal baseline is out of date at both local and national level."

The 2024 census is here: https://www.npws.ie/sites/default/files/publications/pdf/IWM158.pdf

Equipment and mitigation

The revised works description includes a boomer or sparker for subbottom profiling. The noise discussion in section 3.2.1 concentrates on vessel engines and drilling and does not provide a source

specific quantitative assessment of the boomer or sparker there. Section 3.2.1.3 provides a 30 minute watch within 500 metres and allows intrusive works to continue at night or in poor visibility. The document also uses different species wording in its operational mitigation passages.

Overlapping noise

The cumulative mitigation wording refers to separating active acoustic survey operations from noise associated with other projects. MARA should clarify whether the same coordination covers drilling and every other relevant noise source.

Acoustic assumptions and actual vessel movements

The January Annex IV report assumes geophysical frequencies of about 100 to 600 kHz and an acoustic influence of only a few hundred metres (pages 12 to 13), while also listing a boomer or sparker. MARA uses a 6 km in-combination scope (screening page 18). The distances serve different purposes but their assumptions require reconciliation. The manufacturer's datasheet supplied with the applicant's response lists AA201 at a typical source level of 212 dB re 1 µPa at 1 metre with 200 J, and AA301 at 215 dB with 300 J (PDF page 142). These are illustrative specifications rather than confirmed project settings. MARA should require confirmation of the proposed equipment, operating energy, acoustic metrics and maximum source levels. The June response describes workboat transit speeds potentially reaching around 15 to 20 knots, depending on sea state, and crew transfer RIB speeds around 20 to 25 knots (pages 8 and 11). The NIS relies partly on slow operating speeds for its low collision risk conclusion (section 2.4.3). The assessment should address transit routes and speeds alongside slower survey operations, with appropriate wildlife avoidance measures.

Otter and seasonal protection

As an avid nature lover, I have been lucky enough to see otters on the banks of the Moy River that flows into Cregg beach, elusive and beautiful, these protected mammals are recorded in the area and feed on small fish and trout in the river. My neighbours have also seen them over the years, how lucky are we.

The Annex IV report describes otter use of Liscannor Bay shorelines and intertidal areas (pages 13 to 14), while the NIS screens otter out on an offshore and subtidal premise (page 50). Trial pits and probing are nevertheless included at Cregg. The applicant should identify its site survey evidence and assess shoreline access and resting places. The 24 month licence also requires assessment of seasonal seal use or binding seasonal limits.

The currency of the NPWS advice

The Department's observation of 8 April 2026 supported the original conclusion that the surveys could be screened out at Stage 1, before MARA determined on 7 August 2026 that Stage 2 Appropriate Assessment was required and before the revised NIS was prepared. The same observation noted that a Regulation 54 derogation for Annex IV species may be required. When asked whether that advice remains current, the Department replied on 5 October 2026 that, as this is a live application, it is not in a position to comment further. MARA therefore holds no NPWS observation on the revised NIS.

A relevant example of seasonal protection

MARA's MUL240033 assessment report of 25 March 2026 recommends a licence condition preventing site investigations within 200 metres of NPWS mapped harbour seal breeding sites in

Galway Bay Complex SAC between 1 June and 31 August each year (section 3.8.5, printed page 21). This provides an example of explicit seasonal protection; it is a recommended condition and does not establish an identical restriction at Cregg. MARA should assess whether the local seal evidence warrants appropriate location and species specific restrictions for MUL260006.

Action requested from MARA

1. Require analysis of the 2025 survey results, including locations, seasonal use and any relevant haulouts or breeding use. Explain the relationship between those locations and the proposed operations.

2. Identify the maximum acoustic parameters and provide site-specific modelling for the boomer or sparker before determination. Reconcile the Annex IV report, NIS and MARA screening assumptions, including the basis for the conclusion that no Regulation 54 derogation is required.

3. Specify the applicable NPWS guidance and explain any departures. Make species coverage, observation periods, exclusion zones, start and restart procedures and stop work triggers consistent and enforceable.

4. Explain how protection will remain effective in darkness, poor visibility and changing sea conditions. Apply coordination to all relevant underwater noise activities.

5. Apply or justify departures from NPWS 2014 seismic provisions for boomers and sparkers, including the default 1,000 metre monitored zone, daylight start and applicable ramp-up and restart rules. Assess transit routes and speeds and specify wildlife avoidance measures.

6. Assess otter use of shoreline access points and adjacent watercourses. Define seasonal protection for seals and the permitted operating window across the 24 month licence.

7. Obtain NPWS observations on the revised NIS before determination, including on whether a Regulation 54 derogation is required, and publish them.

Liscannor Bay is not an empty stretch of sea. It is a living place, and many of us have grown up watching its seals and dolphins thrive here for many years.

I ask MARA to make sure the evidence about these animals is in front of it, and properly weighed, before it decides. Please explain in the determination how they will be protected.

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]

Sources supporting this submission

Revised SISAA and Natura Impact Statement, August 2026. Sections 2.2, 2.6.1, 2.7.5, 3.2.1 and 3.3.

National Biodiversity Data Centre, Liscannor Bay Seal Surveys 2025 dataset metadata. Survey description, methods and dataset statistics.

Applicant Risk Assessment for Annex IV Species, January 2026. Pages 4, 12 to 14, 32 and 33.

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

Applicant attachments to the June 2026 response, Applied Acoustics boomer plate datasheet. PDF page 142, model names and source specifications.

NPWS Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Waters, January 2014. Section 4.3.4(i), pages 25 and 26.

MARA Appropriate Assessment Screening and Determination Report, determination 7 August 2026. Page 18, 6 km scope and two-year period.

Department of Housing, Local Government and Heritage (Development Applications Unit), observation of 8 April 2026, and reply of 5 October 2026.