

Bill Goggins

From: [REDACTED]
Sent: 12 November 2020 19:56
To: IFD Public Consultations

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi,

I'm looking for information on the figures that justify opening the Owenea with a quota of 199 salmon?

I run a Facebook group for anglers on this river. They have unanimously voted to pursue maintaining catch and release. We do not feel the river can afford to lose such a large number of salmon.

I look forward to hearing from you in regards to this.

Regards,
[REDACTED]

Bill Goggins

From: [REDACTED]
Sent: 13 November 2020 09:24
To: IFD Public Consultations
Subject: Public consultation draft netting.

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern,

I wish to make a short submission on this matter.

For the past 50 years Salmon and Sea trout numbers have been in serious decline on the great Irish western lakes and rivers. This is a known fact.

All of the scientific data is showing that salmon have a much lower survival rate at sea now than ever before. Frankly, The Atlantic salmon is now facing extinction in the face.

Local angling club members are giving up their own free days and holidays to try repair some of the damage done to habitat and spawning streams. Tiny gains are being made but every tiny gain takes thousands of man hours and thousands of euros in investment.

In the US scientific studies showed that the cost of getting a single adult salmon to the spawning grounds cost over 9000 euro per fish to the taxpayer.

The economic sense of netting a wild salmon simply makes no sense whatsoever.

Please, look at the overwhelming scientific evidence from all worldwide Atlantic salmon studies. Do not grant any licences to kill any returning wild Atlantic salmon. Each salmon that returns from the sea to spawn on the west coast of Ireland is actually worth its weight in gold.

Thank you,

[REDACTED]

Bill Goggins

From: [REDACTED]
Sent: 13 November 2020 11:04
To: IFD Public Consultations
Subject: Inland Fisheries Division submission

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi, As a passionate salmon angler, I'm really worried about the decline in our atlantic salmon. So far anglers are doing their bit to help safe gaurd these kings of fish. I think shortening the salmon season would also help preserve stocks, having our salmon season open on Saint Particks weekend and close on the end of August. Alot of kelts are caught at the start of the season and with the opening day now pushed back this reduce the numbers of kelts caught. This is just my thoughts and I hope they are considered. Tight lines.

Bill Goggins

From: [REDACTED]
Sent: 13 November 2020 12:19
To: IFD Public Consultations
Subject: Submission

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom concern,

I am sending this to you as a concerned angler of lough Corrib.

I am fishing Lough Corrib for over 35 years now. Under the EU directive pike are not native and they say they should be culled as lough Corrib is an SAC.

The salmon quota for the Corrib is 4540, salmon are an Annex II species.

My question is why an invasive fish such as pike should have more legislative protection in Lough Corrib SAC .

In the screen assessment for Lough Corrib IFI allocated for 1300 hundred pike to be removed and anything greater than 85 cm to be returned. This year IFI hasn't even removed a third of that.

My next question is that you can go out and catch a 15lb, 20lb or even a 30lb salmon. But you can't keep an invasive pike over 50cm and you are only allowed to keep one a day. Why do they have more protection?

If an angler goes out fishing and is in possession of a pike over 50 cm he could be prosecuted, but IFI states that removing pike from Lough Corrib is beneficial to the SAC ??

Pike are also regarded by Inland Fisheries Ireland as a non-native species within the context of the EU Water Framework Directive (IFI, 2018) (lough Corrib screen assessment 2020 4.1)

Honestly you couldn't make this stuff up.

Regards,
[REDACTED]

Bill Goggins

From: [REDACTED]
Sent: 13 November 2020 12:50
To: IFD Public Consultations
Subject: Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2020

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Sir,

As a regular angler on Corrib, both as a resident for a number of years and now as a visiting angler, I wish to make representation regarding the current inequality in the harvesting of fish within the Corrib system. At present there is a 4 trout per day limit for trout and varying bag limits for salmon, according to the time of year, with a new maximum take as set out in the proposal above. At the same time there is a one fish only limit, below a specified size, for pike, arguably an introduced species, and a similar, laughable, limit on the taking of roach, a wholly invasive species that is doing untold harm to the biomass of lough Corrib. Lough Corrib is a lake that provides some of the finest dry fly fishing for brown trout in the world from April until the end of the season. This is being eroded fast by the imbalances caused by the invasive species, more particularly as they are better protected than the superb natural gamefish species that the lake is famous for.

It is high time that Fishery Byelaws were made to specifically reflect the requirements of particular waters instead of the apparent knee jerk reaction policies currently in place driven by undue pressure from specific angling groups. I spent most of my working life in fishery management and the decisions I made were intended to satisfy the needs of the water I managed, not the fishermen. Properly managed Corrib could remain the blue ribbon water it has been but as it is managed at the moment it will continue on the downward spiral it is now in.

Yours faithfully

[REDACTED]

Bill Goggins

From: [REDACTED]
Sent: 13 November 2020 17:21
To: IFD Public Consultations
Subject: Salmon & sea trout regulations .. 2021

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

In the interests of conservation , please consider reducing the daily limit for retention of wild salmon , post May 12, from 3 per angler to 1. Far too many spring salmon are being killed in May and June. Our wild salmon stocks are in decline and legislation is essential to reduce mortality by anglers [REDACTED]

[REDACTED]

Bill Goggins

From: [REDACTED]
Sent: 13 November 2020 19:39
To: IFD Public Consultations
Subject: Blackwater quote

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi

I am objecting to the high quote that has been given to the Blackwater it is time, we should be protect what salmon we have in your rivers at this time for the future of salmon and not for the gain of others.

Well done on the Suir C&R. 🐟

[REDACTED]

Sent from Yahoo Mail on Android

Bill Goggins

From: [REDACTED]
Sent: 13 November 2020 19:45
To: IFD Public Consultations

Categories: ReVisit

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

With regard to the lower river Lee ,Cork-I myself and many seasoned anglers concluded that the 2020 run of fish was probably the best run of fish in the last decade.The average size of the grilse observed was also up on previous years.The brown tag system has caused division amongst ordinary anglers as some were left without tags and this has led to some tackle shops refusing to sell licences next year if they are forced to discriminate amongst their loyal customers in choosing who gets first preference. Our sport is dying as any young person thinking of going salmon fishing is bombarded with rules and regulations before he even gets to a river. Everybody has had a hard year _ including anglers_ and many clubs are losing members because of covid restrictions preventing them travelling to their rivers.Anglers are the guardians of their rivers and their absence on the bank will result in the rivers being wide open to every sort of abuse.I totally agree with the protection of this majestic species of fish but dividing anglers with this brown tag system is doing more harm than good as it is punishing the men who care

Bill Goggins

From: [REDACTED]
Sent: 13 November 2020 21:07
To: IFD Public Consultations
Subject: Regulations

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Minister

I suggest total catch and release for all salmon and all sea trout on all fisheries, with single hooks only and no bait (including shrimp/prawn).

Many thanks

[REDACTED]

Bill Goggins

From: [REDACTED]
Sent: 14 November 2020 09:37
To: IFD Public Consultations
Subject: Objection to the proposed opening of the Owenea, Donegal

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern,

I wish to lodge my objection to the proposed harvesting of 199 salmon from the Owenea and state my preference for maintaining the catch and release status of the river.

As an angler on the ground, I do not feel the numbers are sufficient to warrant such a harvest.

Kind regards,
[REDACTED]

Sent from my iPhone



West Clare Anglers Association

Cooraclare,

Kilrush,

Co Clare.

10—11-20

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

I write to you with regard to the Doonbeg river. This year it would appear that there was an excellent run of salmon into the river. While Fishery Officers have been working hard to ensure the safe passage of fish up to their spawning grounds, they have a difficult task due to the history of the poaching of salmon along the river.

During the year quite a number of young people took up fishing in the West Clare area and membership of our organisation grew considerably. In the past there have not been many salmon anglers among our membership. This year however there was an increase in interest in Salmon Angling and in the improvement of our river banks. Our members would like to join in the preservation of our salmon stocks and assist our fishery officers in the protection of our river.

If the Doonbeg river were to become a "Brown Tag" fishery, then I believe that many of our members would purchase Salmon Licences and play their part in the conservation of our salmon stocks. It is also my belief that the stock of salmon in our river is healthier than it has been for years. Therefore I request that the I.F.I. open our river system to Brown Tag status. Then anglers and fishery Officers would all work together in the protection and development of the river.

Congratulations on your recent appointment to the Shannon Regional Fisheries Board. We recognise the excellent record you have in Fisheries, particularly in the area of protection and we wish you every success for the future.

Yours sincerely

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Bill Goggins

From: [REDACTED] >
Sent: 20 November 2020 21:12
To: IFD Public Consultations
Subject: Salmon Regulations

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I am delighted that the River Suir will be catch and release for salmon for 2021. The damage done to this great river through over fishing legal and illegal, pollution etc in the last forty years or more can never be undone, the decline in salmon numbers returning has slowed in recent years and hopefully we will see returns increasing in the coming years. There are significant challenges ahead for this wonderful fish on this island and I believe all commercial salmon fishing should be discontinued and catch and release promoted on all rivers.

Sent from  for Windows 10

Bill Goggins

From: [REDACTED]
Sent: 23 November 2020 09:47
To: IFD Public Consultations
Cc: ~~francis.odonnell@fisheriesireland.ie~~
Subject: Kerry Blackwater
Attachments: IFI Letter.docx

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Minister,

We would ask you to give serious consideration to our ongoing concerns with regard to the number of salmon and sea trout being recorded on the Kerry Blackwater fish counter. As you will note from the copy of our email attached, sent in August, to Mr Sean Long, Inland Fisheries Ireland Macroom, giving voice to these concerns, this has been an ongoing problem for a number of years.

Under the Wild Salmon and Sea Trout Tagging Scheme Regulations, the Kerry Blackwater River is the only river in Kenmare Bay open on a catch and release basis. All the other rivers are open for the taking of a limited number of salmon and sea trout. Sheen River (1,2360), Sneem River (695), Roughty(415) and Glanmore (254).

When the Fish Counter was constructed on the Kerry Blackwater in the early 2000's it was to be regarded as an indicator counter for all of Kenmare Bay. If that is the case then either all the proposed numbers for the rest of the rivers in Kenmare Bay are wrong or the fish counter on the Kerry Blackwater is recording incorrect numbers. We are of the firm opinion based on years of experience on the river, that the salmon and sea trout numbers have been recorded incorrectly for some years.

This observation which we are submitting is not about catching multiple numbers of salmon as we are very mindful of conservation, but we feel that the Kerry Blackwater is not getting fair play. We have set out our rationale in the letter attached for the river to be open in 2021 for limited exploitation.

Yours Sincerely,

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
17/11/2020

Dear Minister Eamon Ryan

I come from a family of five generations of wholesale and retail fishing tackle in Ireland. [REDACTED]
[REDACTED]

Submission Re Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2020

I [REDACTED] being an angler with a disability (Spina Bifida & Hydrocephalus) wish to make the following submission regarding your decision to again allow only catch and release on the Argideen River situated in the Cork catchment area.

The Argideen River is the only river in my area that I can fish. The River is managed by The Argideen Anglers Association in conjunction with the South West Regional Fisheries Board.

I am a member of this association and can only fish from the disabled stand of which there is only one on the river which has a catchment area of some fifty-six square miles. The pool I fish is located at Inchy Bridge has over the years almost fully filled up with gravel and is also a tidal pool. This disabled stand was put in place by the association at great expense.

Whilst I do agree with the practice of catch and release as a disabled angler only being allowed to flyfish for Salmon & Sea Trout under the current regulations governing catch and release bye-law #975, 2019 which states "anglers may not use worms". I feel that this is totally unfair to anglers with disabilities.

My ability with movement is very much restricted which does not allow me flyfish from a wheelchair. I do know that other disabled anglers do have the movement that does enable them to flyfish but that in my case is not so. My preferred method of fishing for Salmon and Sea Trout is by Worm which is prohibited in bye-law #975 2019. Worm fishing is by far the easiest when I need to do my fishing from my chair. I can spin fish but again this is not easy.

I refer to the regulation set out by yourself Mr Ryan and the IFI.

The regulations do NOT in any way refer to the disabled anglers needs, and the facilities provided by your department and the IFI in my area are almost non-existent. I would hope that this would be look at seriously by you and your department in the extremely near future.

I hereby ask that you further amend regulations forthwith to allow anglers with disabilities and make wheelchair users exempt from the catch and release bye-law #975 2019.

I hereby thank you for reading my submission and look forward to your favourable reply.

Yours Sincerely,
[REDACTED]
[REDACTED]
[REDACTED]

Cc: An Taoiseach Micheal Martin (Cork South Central)

Minister Micheal Mc Grath (Cork South Central)

Minister Simon Coveney (Cork South Central)

Tom Morrison

Inland Fisheries Ireland (Dublin)

Inland Fisheries Ireland (Macroom)

Bill Goggins

From: [REDACTED]
Sent: 27 November 2020 12:32
To: IFD Public Consultations
Subject: Wild Salmon and Sea Trout Tagging Scheme Regulations 2020 and Conservation Measures for the 2021 Season

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi,

I would like to submit an observation.

Why are Pike (*Esox Lucius*) an invasive species to the Lough Corrib SAC system being given more legislative protection than Atlantic Salmon (*Salmo Salar*) which are an Annex II species?

regards,
[REDACTED]

Bill Goggins

From: [REDACTED] >
Sent: 30 November 2020 08:51
To: IFD Public Consultations
Subject: Blackwater salmon and sea trout regulations 2021

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern,

I want to put in a objection in regards the increase in the TCA for the 2021 season as it's not justified that a increase in quota.

For 3 months angling how can it happen the the quota is increased as it should be decreased.

We have NO fish counter on the system and all the recording of fish is guess work.

I'm personally aware that fisheries on the Blackwater have not submitted there returns.

IFI talk about CPR so why not protect what we have and stop the slaughter.

Regards

[REDACTED]

Bill Goggins

From: [REDACTED]
Sent: 30 November 2020 11:08
To: IFD Public Consultations
Subject: Objection 2021

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi

We wish to register an objection to the Salmon Sea-trout draft regulations 2021 for the Munster Blackwater for the increase in the TAC.

There is no scientific support for such increase. Is this just because of half decent run of summer fish in 2020 if anything the TAC should be reduced to protect our already dwindling stocks.

Scientific studies should be done on a five year average to obtain if it is feasible to allow a increase in the TAC.

This is not the case.

Kind regards

[REDACTED]

[REDACTED]

Blackwater Fly Fishing

[REDACTED]



Get [BlueMail](#) for Android

Bill Goggins

Subject: FW: River Lennon co.donegal.

Sent: 05 December 2020 22:54

To: IFD Public Consultations

Subject: River Lennon co.donegal.

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello minister Ryan. In relation to the Lennon river in co donegal closed till the 12 of may is of great concern. Under the freedom of information act that river should not be closed .There was over 800 fish spawned the year before. Now the river in falcarragh called the tullybeglly its open and it only spawned 10 fish that same year. I cant understand why. When you have men on the river fishing you are keeping poaching of it.its common sense. The river Lennon has more fish that 7 rivers in donegal and the fish run all year round. Under the circumstances in the world we have today it's the only bit of peace a man can relax and come back to nature. I hope minister Ryan you could change the river to be open again on the 1st of January. 1 stroke of a pen and you can change it. Hopefully minister Ryan you will have a change of heart.



God bless you and have a great Christmas.

Bill Goggins

From: [REDACTED]
Sent: 07 December 2020 19:33
To: IFD Public Consultations
Subject: Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2020 - Consultation
Attachments: Salmon & Sea Trout Bye-Law submission to DECC 2020.pdf
Importance: High
Categories: ReVisit

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern,
Please find attached our submission to the consultation on the Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2020.

Could you please acknowledge receipt by return email?

Thank you.

--

Regards,
Lough Corrib Pike Research & Control Group.

"Northern Pike are a problem, not an opportunity".

Bill Goggins

From: [REDACTED]
Sent: 07 December 2020 20:05
To: IFD Public Consultations
Subject: Submission on Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2020
Attachments: Submission from the Alliance_D2_1Dec2020.docx
Categories: ReVisit

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Please find attached submission from Barrow , Nore and Suir snap net Fishermen's Alliance

For further information on this submission please contact;

[REDACTED]
Chairperson, Barrow Nore and Suir Snap Net Fishermen's Alliance
[REDACTED]

Bill Goggins

From: [REDACTED]
Sent: 10 December 2020 13:16
To: IFD Public Consultations
Subject: FW: Blackwater quotas 2021 - Consultation on WSST 2020

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

-----Original Message-----

From: [REDACTED]
Sent: Thursday 10 December 2020 12:47
To: Macroom Info
Subject: Blackwater quotas 2021

I understand the date for people to comment re the above is 11 Dec. I had written to Sean Long as below but as he is away till 14 Dec could you please forward my below e mail to the person dealing with quotas. Thank you.

"Sean,

Blackwater quotas 2021

I am writing re the above to suggest that the quotas for 2021 are not increased.

Although much greater numbers of fish were caught, and seen, this year than in the last years because there's no scientific explanation for why there were greater numbers of fish it can't be taken as an indication that the long term trend in stocks has been reversed.

With stocks continuing depleted and the uncertainty factor of the statistical information used surely the error in the amount of the quota should be on the side of caution and increasing the quotas is a higher risk strategy which the actual situation does not merit.

Regards,

[REDACTED]

Thank you for your help.

[REDACTED]

This email and any attachments to it may be confidential and are intended solely for the use of the individual to whom it is addressed. Any views or opinions expressed are solely those of the author and do not necessarily represent those of Inland Fisheries Ireland. If you are not the intended recipient of this email, you must neither take any action based upon its contents, nor copy or show it to anyone. Please contact the sender if you believe you have received this email in error. D'fhéadfaí go bhfuil an ríomhphost seo agus ceangaltáin ar bith atá in éineacht leis faoi rún agus iad beartaithe d'úsáid an duine a bhfuil a s(h)eoladh air amháin. Dearcthaí nó tuairimí ar bith atá curtha in iúl ann, baineann siad leis an údar amháin, agus ní chaithfidh go n-aontaíonn lascaigh Intíre Éireann leo. Mura tusa faighteoir beartaithe an ríomhphoist seo, ná déan rud ar bith mar gheall ar an méid atá ann, ná é a chóipeáil ná é a thaispeáint

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

11 December 2020

Re: Consultation on Wild Salmon and Sea Trout Tagging Scheme Regulations 2020 and Conservation Measures for the 2021 Season – Owenea and Owentocker rivers.

Dear Minister Ryan,

As a traditional draft net fisherman on the Loughros Mór Estuary I am writing to you in support of your decision to designate the Owenea and Owentocker rivers an open fishery, with a small surplus for the 2021 season.

In conjunction with information derived from other stakeholders, I fully appreciate the important role that traditional draft netting plays in terms of providing crucial catch and scientific data about wild Atlantic salmon stock.

Draft net fishing on the Loughros Mór estuary is a historic tradition, with many of the skills, methods and knowledge passed from down from previous generations. The practice generates much interest in the area and fosters community spirit and engagement between the fishermen, their families and the wider community. By extension, the fishery plays a positive role in the mental health and wellbeing of those engaged in it.

Thank you for taking the time to read my submission.

Yours faithfully,

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
10th December 2020

RE: Wild Salmon and Sea Trout Tagging Scheme Regulations 2020 consultation: rivers Owenea and Owentocker rivers

Dear Minister Eamon Ryan,

I am making this submission in support of the decision to designate the Owenea and Owenea rivers a brown tag fishery, with a total allowable catch of 199 fish, for the 2021 season. For many years my family and I have fished on the Loughros Mór Estuary using a traditional draft net. I look forward to the resumption of the practice and passing the skills and knowledge on to the next generation. I also recognise the crucial role of catch data derived from the fishery, when combined with other catch data and scientific advice, in providing an overview of salmon and sea trout stocks,

Kind regards,

[REDACTED]

TO: F.I. Public
Consultations.

~~_____~~
~~_____~~
~~_____~~

30/11/20

Re: R Lee Park

Beaver Tag E4

2020

Dear Sir

In view of the
exceptionally large run of salmon
in summer on the R. Lee last
season and in view that the
river is permanently stocked
with salmon from the L.S.C.
I think each flock I suggest
that a Beaver Tag on this run
should only apply up to 14th
May 2021.

Yours faithfully
~~_____~~

Bill Goggins

From:

Sent:

12 November 2020 22:26

To:

IFD Public Consultations

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear ifi ,it seems pike ar a YOUR number 1, WHY ARE YEE PROTECTEING PIKE, why ar pike protected, WHEN PIKE STOCKS AR AT AN TRIVING RATE ,AN SALMON STOCKS AR DECREASEING , SOON IT WILL B TO LATE TO SAVE OUR SALMON , WHAT WILL U DO THEN ,SEND PIKE TO SEA AN HOPE THEY COME BACK SILVER ,YER A JOKE, "SO TELL ME PLEASE WHY AR PIKE PROTECTED "

Bill Goggins

From: [REDACTED]
Sent: 13 November 2020 17:09
To: IFD Public Consultations
Subject: Fwd: Salmon regulations submission

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

----- Forwarded message -----

[REDACTED]
Date: Fri, Nov 13, 2020 at 2:30 PM
Subject: Salmon regulations submission
To: <IFDpublicConsultations@deer.gov.ie>

Dear Minister,

As a keen salmon angler and a person who is extremely interested in the success of the species, I would suggest you open closed rivers on at least a catch and release basis. When no anglers are on the water, potential issues such as poaching, pollution and predators, to name just a few, can go unchecked, unnoticed and not reported. Anglers are the eyes and ears of rivers and the people who care most about the water quality and the species that live in these waters. Closing rivers is a dangerous policy that will not benefit salmon survival.

Yours sincerely,

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

SLANEY RIVER TRUST

Minister Eamonn Ryan,
Inland Fisheries Division,
Department of the Environment, Climate and Communications,
Elm House,
Earles Vale Road,
Cavan Town.

IFDPublicConsultations@decc.gov.ie

4th December 2020

Dear Minister Ryan,

I am writing to you on behalf of the Slaney River Trust (SRT) who represent stakeholders, including riparian owners, fishing clubs and individual anglers along the River Slaney. The reason for this letter is to make a submission on behalf of our members to draft 2021 proposals.

We understand the data produced by the Standing Scientific Committee (SSCS) forms the most critical element for management decisions and whether or not rivers should be open to fishing. We acknowledge the limited resources available to IFI in assessing fish stocks and understand it is a highly onerous and resource demanding initiative, given the number of fisheries throughout the country. We have looked at the Slaney's key indicators and would like to submit our views on these and how we believe what we feel is generally an excellent policy on the river could be slightly adjusted accordingly.

Counter Data

We were delighted to hear that the counter on the Slaney in 2020 registered record numbers of salmon. While this is positive, we feel it does not necessarily indicate a stronger run than in previous years. What it does tell us is that many more salmon migrated via the fish pass (where the counter is located), however, this could be for a number of reasons:

1. **Water Levels.** At high water fish tend to run over different parts of the weir rather than through the pass in which the counter is located. In order to evaluate a run based on counts a correlation between river heights above and below the weir would need to be reviewed in order for the data to be an accurate and relevant figure to be relied upon on an annual basis. The SRT's understanding is that water levels are not considered within this data, apart from the doubling of numbers to compensate for fish that don't use the pass. We believe this method could and often does result in false positive or negative results.

Office: Ballybawn Lane, Rathnure, Enniscorthy, Co. Wexford.
Committee: R Burgess, (Chairman), B Connolly, D Dobbs (Treasurer & Deputy Chairman), R Harvey, T Mernagh (Secretary), K Murphy, D Ryan, N Scott, K Whelan, C White

Slaney Rodfishers Association is affiliated with Slaney River Trust Ltd.

SLANEY RIVER TRUST

2. In 2020 the SRT negotiated a favorable water regime (with the owner of the Clohamon millrace) ensuring more water flowed over the weir and down the depleted reach rather than down the adjacent millrace. We believe this had a positive impact on fish migrating over the weir in 2020, of which a proportion would have swam via the counter.
3. Timing of run. Water levels were perfect for the spring run making the counter pass attractive for salmon to ascend the weir. Often in the spring during high water periods this is not the case. We also noted a large run of salmon in August and September at similar water heights. And again, this back end run quite often coincides with much higher water levels, resulting in salmon ascending over other parts of the weir rather than via the counter.

Rod Catch Data

The benefits of using rod catch data on the River Slaney when making a comparison on an annual basis in its current state may not give the most accurate results. The main reasons for this:

1. Later opening dates and earlier closing dates will skew the figures when making comparisons. The start and end of the season often provided a large portion of catch figures traditionally. Not having legitimate angling presence during these periods in recent years has reduced the annual recorded catches.
2. The high level of poaching, in which many salmon are caught and not reported, is continuing to increase. Prior to high levels of poaching along the river these salmon would have been caught by the legitimate angler and recorded.
3. The Covid situation in 2020 and the assumptions made as to what might have been caught without Covid we believe is speculative and may not teach us a lot.

Catchment Wide Electro Fishing

Electro fishing on the River Slaney has been sporadic. As a result, the 5 year running average in 2020, a critical element when assessing stocks, is based on electro fishing surveys over the past 11 years.

Year	2008	2009	2010	2014	2016	Average
CWEF value	5.00	15.9	18.4	17.7	9.1	13.2

The 5-year running average in 2016 was under the required level to allow the river to remain open. The Catchment Wide Electro Fishing Survey (CWEF) value was 13.2, but as you will see from the table above, the reason for such a low average was predominantly due to a very poor count in 2008, 8 years earlier. Two full lifecycles (for a grilse) earlier yet this figure formed the most critical part in the low average resulting in full closure of the river. Using such data to form the main basis as to why the river was

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fully closed to salmon fishing that year was very disappointing for us, a view we expressed at the time.

In 2017 the SSCS together with management following a review lowered the level at which an Irish river could be open to catch and release fishing from <17 salmon fry per five minutes standardised electro fishing to <15. As a result, the Slaney was opened as it was electro fished in 2017 removing the low 2008 figure which formed part of the average in 2016. While we welcomed the decision to lower the index as it meant the river could reopen, there was a caveat in place for the Slaney as it was considered to have a significant multi sea winter component (and correctly so) and a later opening date of April 1st was applied. Given the absence of further electro fishing data since 2017 the figure for the Slaney remains at 15.1. As a result, we are relying on a 5 year running average taken from data over an 11 year period. This figure we believe is therefore outdated, and should not be relied upon when making critical management decisions.

Summary

We feel these 3 assessment indicators; Rod Catches, Counter Data and Electro Fishing Data, are key to estimating stocks. They provide vital information about fish numbers throughout Ireland. We would like to make it very clear that we are not criticizing these models. We're sure many countries are envious of our system and its industry leading live/on demand nature. It is the data currently available for analysis on the river Slaney that we believe to be insufficient and therefore will not give a worthwhile result due to the points raised in this letter. We would also like to point out that over all we believe the management decisions made are excellent and believe these decisions have enabled fish stocks on the Slaney to improve in recent years. IFI and their scientists deserve huge credit for this. We believe the policy of catch and release is the right one and should remain. We believe fly only is correct. We believe there should be no harvesting of salmon and obviously the absence of the draft nets to be of critical importance. While we understand the decision to delay the opening of the season until 1st April is for the very best intentions in preserving the precious multi sea winter Spring run, we feel strongly this decision is having the opposite affect due to poaching.

As you will see from our recent submission for the 2021 season (sent prior to the publishing of the 2021 Draft regulations), the main concern of the SRT due to closing the river initially and now the shortened season is that poachers have thrived and continue to do so. The opportunity Covid presented compounded this. As you will see in our letter (attached) our request is that the river opens earlier on a catch and release basis. We believe this will reduce salmon mortality (as legitimate anglers will deter poaching) but also give a huge boost to those who run clubs in addition to riparian owners who have struggled to maintain viable fisheries in recent years.

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We therefore ask that the season opens on the 1st March in 2021, and that all other elements of the draft regulations remain the same, the most critical one of these being that fishing is permitted on a catch and release basis only.

In the interests of protecting the river at its most vulnerable time the SRT are in the process of recruiting 10 water keepers, one of which will be employed and funded by the SRT's limited cash reserves. We will also continue to work on improving the Tailrace situation and appreciate very much the efforts IFI have shown and we look forward to working with them in 2021. We hope this demonstrate our commitment and credibility, and that our advice/request will be given serious consideration.

Yours Sincerely

A black rectangular redaction box covering the signature of the representative of the Slaney River Trust.

Slaney River Trust

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Ballinduff Bay Angling Club

LUTIMNAGH, CORRANDULLA, CO. GALWAY.

Attn: Inland Fisheries Division

01.12.2020

Dept of the Environment, Climate and Communications

Elm House

Earlsvale Road

Cavan Town

H12 A8H7

Ireland

RE: Wild Salmon and Sea Trout Tagging Scheme Regulations 2020 and Conservation Measures for the 2021 season.

Dear Sirs,

We would like to make a number of comments regarding the above.

Comment No. 1

While IFI may regard this as an amendment of current legislation, we are of the opinion that all new legislation must go through the statutory requirements dictated by the Natura 2000 and the Habitats Directive.

Please find attached details of the proper procedure being adopted by the Dept of Public Expenditure and Reform on a project on the River Deel (Crossmolina) Drainage Scheme.

Specifically, Lough Corrib and its tributaries are within a dedicated SAC.

Therefore, appropriate assessments must be procured in advance of any proposed changes to those systems.



Ballinduff Bay Angling Club

LUTIMNAGH, CORRANDULLA, CO. GALWAY.

Comment No. 2

The conservation measures referred to mention nothing in relation to the protection of coarse fish (including predatory pike) on Lough Corrib.

It is our opinion that continued protection of these species is in violation of the EU Habitats Directive and Natura 2000 which states that pike, perch and roach etc are considered "non benign" i.e. damaging to the environment in a salmonid system and the SAC.

As such, the existing bye laws in relation to these species are in contravention of European Law.

Conservation measures that mitigate for violations of EU Law are worthless and need to be immediately reviewed to allow for proper EU compliant legislation.

Should the Department proceed to apply these regulations despite our information, a file will be sent to the EU for their consideration.

Comment No. 3

Sea Trout numbers have been decimated over the last 30 years due to the huge increase in disease and massive sea lice numbers in the water column which are largely due to the incidence of fish farming facilities along our coast.

We cannot understand why the IFI would want to curtail sea trout fishing numbers because of the wholesale destruction of the species, when the destruction is being caused by government promoted enterprises. It's akin to "shutting the stable door after the horse has bolted".

This the Dept of the Environment, please do something to protect it and shut down those toxic effluent producing facilities.

The protections are not working, recent information has revealed that our wrasse populations have been targeted to aid lice control on the farms. It has emerged that our inshore wrasse populations have collapsed. How much more of our environment is going to be sacrificed to serve large scale business interests.

This is the Department of the Environment not the Department of Environmental Destruction.



Ballindiff Bay Angling Club

LUIMNAGH, CORRANDULLA, CO. GALWAY

Comment No. 4

While the request for submissions does form part of this process – it is a pointless exercise if the relevant authority simply dismisses the content of the submissions received. This was most obvious in the Tuam Babies Disgrace. Where over 90 submissions were disregarded by the Minister.

Please do not allow this to occur on this occasion. Please note that the failure of authorities to include the submissions in documents detail of this type is being recorded for a report to erode.

Regards,

[Redacted Signature]

Secretary of Ballindiff Bay Angling Club

Grange

Corrandulla

Co. Galway

[Redacted Signature]



Dear Sir.

In relation to the Salmon and Seatrout Draft Tagging Regulations for the 2021 season. Salmon Watch Ireland would like to make the following points.

1. Spring Salmon are an extremely important fish from the perspective of ecosystem health and must be further protected. Salmon Watch Ireland would like to see the amount of salmon available to harvest reduced during the period up to 12 May. We advise that two tags be available instead of the present three tags. The limit of one fish per day should remain.
2. As grilse runs appear to be depressed currently, we suggest that the summer season (12th May -31st August) be reduced from 3 fish per day to 1 fish per day.
3. The run of autumn salmon has been in decline and is non existent in many catchments thus these fish must have increased protection. We request that the September (Salmon and Sea trout) and October (Sea Trout) period should be catch and release with no tags issued.
4. Salmon Watch Ireland suggests that support be given by Inland Fisheries Ireland to facilitate local initiatives regarding conservation. Bye laws to reduce exploitation should be supported if local stakeholders request same. Public consultation must form part of the process but conservation and reduction in exploitation must be a priority.
5. It is also a concern that certain methods are used early season which may impact on salmon and sea trout Kelts and a byelaw should be introduced nationally to protect these fish by limitation of methods used.

The commercial sector should also be better controlled with a specific quota dedicated to a period. This might entail that a certain percentage of quota is available in May / June and not transferable to July. However, our policy document sees an end either through suspension or permanent buy out of the commercial sector, but this may take a considerable period of time. Catches will be limited by this proposal as there is anecdotal evidence that tags are kept towards the end of season to prolong their period of fishing. We also suggest a closure of commercial fishery at end of July

Kind Regards



Director Salmon Watch Ireland

08 December 2020

Cork & District Inshore Draft Net Fishermen

Blackrock

As in 2019 I have been asked by the **Cork and District Inshore Draft Net Fishermen** to review the method by which the quota is set. In 2019 in a submission to the IFD Public Consultations I pointed out that the injustice in the system whereby no allowance was made for the fact that a high proportion of the salmon caught were reared fish and should not form part of the quota. The reply I received explains how the quota was arrived at and emphasises that the "Salmon advice is provide based on wild fish".

No effort was made to address the point made in the submission that an allowance should be made for the reared fish in the Netsmens' catch as they are not part of the advice (quota) on wild salmon.

With regard to 2021 it is not clear from the commentary provided by the Technical Expert Group on Salmon (TEGOS) in 2020 but it appears that the estimate of the number of fish returning is based on the rod catch returns using a notional exploitation rate. This is reduced by 46% based on the proportion of reared fish estimated to be in the rod catch. This provides an estimate of the wild salmon stock. The quota is then set based on this number of wild fish. It is not clear whether the commercial catch is used at any point in the assessment.

The quota is then very unfair and penalises the draft net fishery because a high proportion of their catch is reared fish. The quota calculations exclude reared fish from the estimated stock resulting in a lower quota. No allowance is subsequently made for the fact that the quota refers to wild fish only and that the netsmen take a high proportion of reared fish which fills their allowable catch.

In determining their total allowable catch therefore an adjustment should be made:

Number of wild fish caught (quota) and a notional number of hatchery fish = total allowable catch.

Other features of the quota.

Angling catches are highly dependent on weather and riverine conditions. For instance in 2020 the commercial quota was taken early in the season because there were plenty of fish present. Despite this angling returns were low. Angling catches can be low when commercial catches are good (indicating a good run of fish). Some adjustments to stock estimates should be considered based on commercial catch.

The commercial netsmens' catch is constrained by a number of factors

- 1) The allowable quota
- 2) The number of days they are allowed fish
- 3) The weather

In many years they are not able to achieve the quota because of unsuitable fishing conditions and or adverse weather. The quota is determined using precautionary approaches and is there to protect

wild salmon. The fishermen should be allowed leeway by way of extra days when the quota is not being achieved. The quota is designed to protect the wild salmon and therefore if fishermen achieve their quota the wild stocks are protected. There is also the added protection that the actual wild stock numbers in the catch are lower because a high proportion are reared fish.

[REDACTED]

[REDACTED]

[REDACTED]