

**Iascach Intíre Éireann  
Inland Fisheries Ireland**

support species which utilise the marine environment for parts of their life cycle (e.g. salmon, sea trout, eel, lamprey species).

### **Aquatic Biological Diversity**

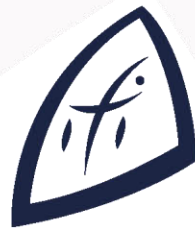
Fish need unpolluted water and abundant food in a healthy habitat that provides spawning areas, shelter and freedom of movement. The bed and soil of any surface water and the associated aquatic and riparian vegetation combine to provide the critical elements on which fish depend. A natural river channel is characterised by morphological features which are vital for the life cycle of fish: gravel shoals or reed beds for spawning, pools and riffles where fish rest and feed, and turbulent reaches which enhance oxygenation. A healthy and sustainable fishery characterises and reflects a broader healthy ecology and a biodiverse and sustainable environment.

Under section 7(3) of the IFI Act it is stated that IFI shall in the performance of its functions have regard to (g) the requirements of the European Communities (Natural Habitats) Regulations 1997 (S.I. No. 94 of 1997) and the need for the sustainable development of the inland fisheries resource (including the conservation of fish and other species of fauna and flora habitats and the biodiversity of inland water ecosystems), (h) as far as possible, ensure that its activities are carried out so as to protect the national heritage (within the meaning of the Heritage Act 1995).

The Irish implementing legislation for the Habitats Directive identifies the Minister for Environment, Climate and Communications as having a role in carrying out monitoring of the status of relevant fish species. The present IFI R&D programme addresses elements of this obligation and complements it by including those fish species listed in the current Red Data Book and not covered by the Habitats Directive including the conservation of diadromous species including salmon, shad, smelt, and lamprey. IFI also has responsibility for pollan and the recreational angling aspect of marine fish species. Pollan for example are a rare endangered and protected species listed and protected under Annex 5 of the Habitats Directive. The Irish Pollan (*Coregonus Pollan*) is unique to the Island of Ireland with its current known distribution being limited to five lakes, Lough Allen, Lough Ree and Lough Derg and Lough Neagh and Lower Lough Erne. The Arctic char (*Salvelinus alpinus*) is another example of a highly sensitive fish species endemic to Irish upland waters and which is protected under national legislation. Furthermore the European Eel is endangered and additional protection measures have also been introduced in that regard - it is incumbent on Ireland to ensure that the eel and its range and habitat are properly protected. Please also note that there are many surface waters, which are not formally designated, but which support populations of Annex II species designated under the habitats Directive.

### **The National Fisheries Resource – sustainable exploitation and the Irish economy**

Under section 7(2) of the Inland Fisheries Ireland Act, Inland Fisheries Ireland is the statutory authority responsible for the promotion, marketing, development and improvement of inland fisheries and recreational fishing in both fresh and saltwater. IFI has a mandate to market and promote Irish recreational angling in both the domestic and foreign tourism markets and this



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brief acknowledges the importance of angling as a significant contributor to the Irish economy. IFI is also the responsible agency in respect of the licensing and management of commercial and recreational fishing for salmon, with protection responsibilities at sea out to 12 miles from baselines.

Recreational angling contributes more than €800 million to the Irish economy in a normal year, directly supporting over 11,000 existing Irish jobs. Many of these jobs are in rural parts of the Irish countryside and in peripheral regions along our coastline (IFI, 2015). Within the sector, participation rates totalled 446,000 people who were involved in recreational angling in Ireland in 2015, with over 170,000 of these visiting from outside of the State.

Over a quarter of a million Irish adults (273,000) held a fishing rod in that period, with sea angling along with salmon and brown trout angling, observed as the most popular categories where domestic anglers are concerned. The quality of the Irish angling product, the friendliness and hospitality of the Irish people and the country's outstanding scenery were cited amongst the principal attractions of Ireland as an international destination for visiting overseas anglers.

Recreational fishing is a healthy and sustainable outdoor pursuit which contributes significantly to the Irish economy and forms an important part of our cultural heritage. It is vital that landowners strive to maintain good access to our rivers, lakes and seashores for visiting anglers, especially when considering fencing and other infrastructural works which may restrict access to those waterways. Good angling is also critically dependent upon good water quality and good habitat; these areas are covered in the following sections of this submission.

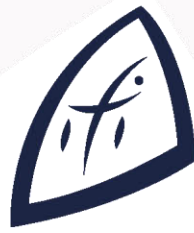
### **The EU Water Framework Directive**

The EU Water Framework Directive (2000/60/EC) is recognised as a critical regulatory legislative provision. The WFD entered into force in December 2000 and requires the protection of the ecological status of surface and ground waters – this encompasses (among other elements) water quality and requires the conservation of habitats for ecological communities.

One of the primary objectives of the Directive is to establish a framework which prevents further deterioration and protects and enhances the status of aquatic ecosystems. Protection of aquatic ecosystems requires that surface water systems be protected on a catchment basis - a shared objective between all relevant public authorities. Article 5 of the 2009 Surface Water Regulations requires that a public authority, in performance of its functions, shall not undertake those functions in a manner that knowingly causes or allows deterioration in the chemical or ecological status of a body of surface water. Article 28(2) of the said regulations states that a surface water body whose status is determined to be less than good shall be restored to at least good status not later than the end of 2015.

### **Climate Disruption / Biodiversity Crisis**

The recent IPCC AR6 report outlined the pace of climate disruption is accelerating and that unless there are "immediate, rapid and large-scale reductions in greenhouse gases (CO<sub>2</sub> and methane), then limiting warming to close to 1.5°C or even to 2°C will be beyond reach.



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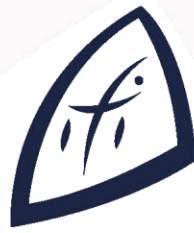
Plan and decision makers must take account of climate disruption / the biodiversity crisis and associated possible mitigation measures when considering any strategic plans / policies or proposals. With ambition to deliver in the context of the Strategic Framework for Public Sector Energy Efficiency, the National Adaptation Plan and most recently Ireland's Climate Action Plan (and upcoming Climate Bill), IFI has identified a number of actions and outputs under the strategic heading of 'IFI's Climate Action Framework' which will be further developed along with measures to address the Sustainable Development Goals in IFI's 'Climate Action Framework'. IFI endorses the similar objectives listed in the Draft CAP Strategic Plan 2023-2027

### **Draft scoping report for the environmental assessment of the CAP Strategic Plan 2023-2027**

The draft scoping report for the environmental assessment of the CAP Strategic Plan 2023-2027 should fully consider and make appropriate reference throughout to sustainability and should make provision for aquatic biological diversity, the fisheries resource and stakeholder interests. This document should recognise that protection of the aquatic environment / habitat not only requires the protection of water quality but also necessitates the protection and maintenance of physical habitat, hydrological processes and regimes and broader biological diversity. In this context and bearing in mind State obligations to ensure sustainable development, it is advocated that these plans prioritise maintenance and restoration of ecological status in all surface waters with a particular emphasis on high quality Q5 sites and systems which continue to show worrying deteriorations in quality.

IFI advocate application of the precautionary principle with respect to any proposal or development where potential for adverse effects are not fully understood. The burden of proof and associated responsibilities reside with those who argue that a proposed activity is safe and environmentally sustainable. As with any development, IFI advocate that all measures necessary should be taken in the *CAP Strategic Plan 2023-27* process to ensure comprehensive protection of local aquatic ecological integrity, in the first place by complete impact avoidance and as a secondary approach only through mitigation by reduction and remedy.

**Education and Awareness** - Implementation of an awareness campaign or measures, along with training and education based on scientific research into the impacts of existing or proposed changes in farming practices is welcome. Enhanced interaction and cooperation between all agencies with an interest in environmental management should be facilitated and encouraged in the *CAP Strategic Plan post 2023-2027* process. Regarding WFD, the Regional Operational Committee system provides a useful knowledge sharing forum for all parties with an interest in water quality and may have the potential to serve as a useful communication vehicle in terms of the ongoing *CAP Strategic Plan post 2023-2027* process.



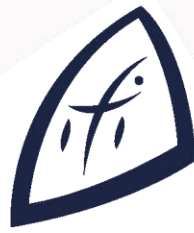
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**Intensification of farming practices** - In approaching the *CAP Strategic Plan Post 2023 -2027* process it should be noted that any intensification of conventional farming practices can pose an unacceptable risk to natural habitats including fisheries habitat and associated water quality. A reduction in water quality can result in a reduction in dissolved oxygen levels, eutrophication (nutrient enrichment), habitat degradation and ultimately suboptimal fish numbers and even fish kills. Aquatic habitats are potentially subject to many pressures (both direct and indirect) from agricultural practices including uncontrolled cattle access, loss of healthy riparian / buffer zones, damaging erosion, erection of barriers to free fish movement, inappropriate watercourse drainage, inappropriate land drainage, inappropriate or poorly planned and executed forestry practices etc. The protection of natural habitats and associated biodiversity as a component of future more sustainable farming is critical. The introduction of agri-environmental schemes focused on supporting less intensive, more environmentally sensitive farming in general but in particular in high-risk areas should be a key priority in any new strategic plan.

**Non-designated habitats and species** - IFI note that Draft CAP Strategic Plan 2023-2027 recognises that protection of the aquatic environment / habitat not only requires the protection of water quality but also necessitates the protection and maintenance of physical habitat and hydrological processes / regimes. *CAP Strategic Plan Post 2023-2027* provides an opportunity for enhanced protection for non-designated habitats and species. IFI advocate the maintenance of watercourses and riparian zones in their open natural state in order to prevent habitat loss and aid in pollution detection. IFI advocate the designation of lands adjacent to surface waters, particularly salmonid systems as areas of open preservation allowing protection / enhancement of biological diversity while providing open space and recreational amenity for river users and natural flood amelioration features.

**Reclamation** - IFI wish to highlight the critical need for adequate regulation and governance of reclamation schemes or activities at scales where there is the potential for significant impacts on watercourses. Impacts can include siltation (during construction) and improved or enhanced drainage / conveyance which can lead to increased river velocities, steam power and can accelerate bank erosion. Planning permission is often not a requirement. Such works can directly result in loss of flood plain areas with associated flood capacity impacts.

**Instream works and a 'Room for the River' approach** – IFI advocate in general, that there is a presumption against any instream interference. It is only in exceptional circumstances e.g. if there is a risk to infrastructure (e.g. outfalls, intakes, bridges) or other sustainable activity (e.g., flood risk management, water supply) that instream works should be considered and then only following consultation and agreement with IFI and other relevant agencies. If there is no significant risk to these activities then the requirement for instream works (such as gravel removal or drainage) should be reconsidered. Where essential, instream works should only be undertaken in a justified, co-ordinated and sustainable manner with minimal impact on biological diversity and natural river processes.



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**Performance-based model** - Any proposed shift from a compliance based to a performance-based model of CAP delivery must comprehensively recognise and meaningfully address current and future sustainability and environmental challenges and responsibilities facing Ireland. IFI welcomes new CAP proposals focused on enhanced climate and environmental ambition post 2020 and advocates the maximisation of environment / biodiversity and climate-oriented measures and supports which will directly impact positively on Ireland's inland fisheries resource.

### **Supporting Ireland's Farmers**

IFI wish to highlight the critical importance of meaningfully supporting Ireland's farmers in meeting and exceeding mandatory requirements under any new CAP scheme in the protection of our environment, the preservation of our biodiversity and in contributing to positive climate action and Ireland's sustainability in the context of the UN Sustainability Development Goals. Again, exceeding mandatory requirements in respect of agri-environment / climate commitments / ecoscheme delivery will either directly or indirectly result in improvements in Ireland's surface water ecological status.

### **Concluding Remarks**

The long-term environmental sustainability of any activity that may impact on the status of fish species, their habitats, fisheries and/or the recreational angling or related commercial activities that may utilise these resources is of primary concern to IFI. IFI is among the public bodies that have a role in making policies, plans or programmes relevant to surface waters in Ireland. Critical and sensitive habitats and species (both designated and otherwise) must be protected. A number of fish species and associated habitats are protected under European Directives in Ireland. From an IFI perspective, all fish species and associated habitats within its remit require protection and management for conservation and development. IFI advocates application of the precautionary principle when considering the fisheries resource in the current process. In addition, all available consideration and support should be afforded to the national 'Blue Dots Catchment Programme' which focuses on the protection or restoration of high ecological status water bodies – a vital component in fisheries ecology, freshwater ecosystems and in Ireland's aquatic biological diversity more generally.

Should you require clarification on any of the above or require a consultation meeting please contact Inland Fisheries Ireland.

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