

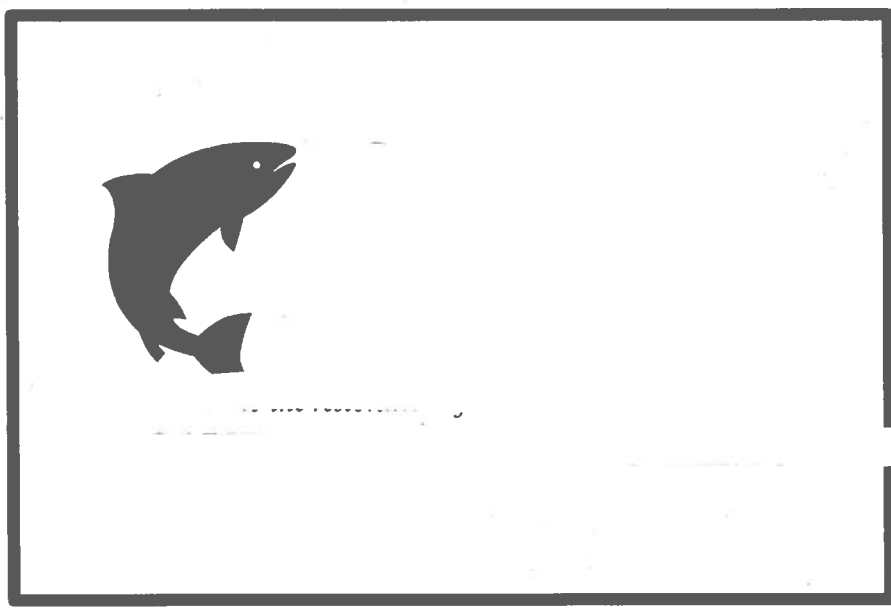
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(DCEE)

From: [redacted]
Sent: Friday 13 February 2026 15:09
To: DCEE IFD Public Consultations
Subject: Submission Draft Regulations 2026 - Wild salmon Tagging
Attachments: Draft Submission New Regulations - 13 Feb Final.pdf

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A Chara,
Please find the attached for your attention.
Kind regards



Submission on the New Draft Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2026 – Salmon Watch Ireland

A chara,

I comes the opportunity to make a submission on the new Draft Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2026.

Overall, we are broadly supportive of the intent and direction of the draft regulations, particularly the continued emphasis on protecting spring salmon, restricting harvest to a defined summer window, and maintaining a conservation-led framework at a time when wild salmon stocks remain under severe pressure. These measures recognise the reality that Ireland’s salmon populations are at, or close to, critical limits in many catchments.

However, while supporting the general objectives of the draft, we wish to outline a number of serious concerns regarding elements of the revised proposals, specifically the increased commercial and individual angling limits, and the proposed reopening of the Castlemaine mixed-stock commercial fishery.

1. Increased Individual Angling Limits

The increase in the number of blue tags available to anglers, from earlier draft proposals, represents a significant relaxation of precaution. While it is acknowledged that only a small number of anglers ever approach the maximum seasonal limit, the

setting of high individual limits nonetheless creates unnecessary risk when considered cumulatively across river systems.

Salmon stocks remain highly vulnerable, with continued uncertainty around marine survival, climate impacts, and freshwater habitat pressures. In this context, increased individual limits do not align well with the stated conservation objectives of the scheme. A lower individual limit would still allow a meaningful recreational fishery while reinforcing the principle that the priority at present must be maximising spawning escapement rather than facilitating higher personal harvests.

Particular concern arises in relation to early-running fish and larger multi-sea-winter salmon, which are disproportionately valuable for stock recovery. Any regulatory change that increases the likelihood of their retention, even indirectly, risks undermining long-term resilience.

2. Increased Commercial Exploitation

We are concerned that the revised draft regulations allow for increased commercial exploitation in certain areas compared with previous proposals. Commercial fisheries, by their nature, exert concentrated pressure over short periods and often operate in mixed-stock environments where weaker component stocks cannot be adequately protected.

At a time when the scientific advice consistently points to declining abundance and reduced margins for error, increasing commercial opportunity risks sending the wrong signal about management priorities. Continued restraint in the commercial sector is essential if confidence in science-led and precautionary fisheries governance is to be maintained.

3.

We wish to place particular emphasis on the proposal to reopen the commercial draft-net fishery in

Castlemaine is a classic mixed-stock estuarine fishery drawing salmon from the Laune, Caragh and Maine systems. While headline figures suggest a combined surplus, this masks both biological fragility and important temporal changes in run timing, particularly for the River Maine.

Recent Inland Fisheries Ireland fish counter data for the River Maine, including the IFI Consolidated Fish Counter Summary Reports (2022–2024), demonstrate a marked shift in the timing of the River Maine salmon run, with a substantially greater proportion of Maine fish now entering the system in June and July, rather than August as suggested in earlier management advice. This represents a significant departure from the assumptions underpinning the , which relied on August being the period of highest Maine stock vulnerability.

As a result of this temporal shift, reopening a June–July mixed-stock draft net fishery in
ould disproportionately intercept River Maine fish during their
peak migration window, substantially increasing the risk of over-exploitation of this
weakest component stock.

The River Maine surplus is currently estimated at just 143 fish. Such a small surplus is
inherently unmanageable when divided between both recreational angling and a mixed-
stock commercial fishery. Even low levels of additional interception create a high
probability of failing to meet the River Maine conservation limit, particularly given
uncertainties around run timing, counter verification, and interannual variability.

Reopening Castlemaine therefore risks repeating a long-recognised management
failure: using stronger stocks (Laune and Caragh) to justify exploitation that the weakest
stock (Maine) cannot sustain. The precautionary adjustments proposed in the draft
regulations do not adequately address this heightened temporal risk.

In light of:

- The demonstrable shift in River Maine run timing into June–July.
- The extremely limited and fragile surplus of 143 fish.
- The mixed-stock nature of the Castlemaine fishery; and
- The overarching requirement to ensure individual river conservation limits are met simultaneously,

We believe that reopening the Castlemaine commercial fishery is incompatible with a
precautionary, science-led management framework. Castlemaine Harbour must
remain closed to commercial salmon fishing in order to safeguard the River Maine and
to maintain the integrity of conservation-based fisheries management.

Owenea and Owentocker (Loughros Bay)

The draft net fishery and recreational fishery allocation identifies a surplus of just 147
salmon — representing a 73% reduction from last year’s surplus of 540 salmon. Such a
dramatic decline clearly demonstrates the fragility of the current stock position.

A surplus at this level cannot reasonably be considered manageable. On the contrary, it
reflects a stock under significant pressure and leaves no margin for error in
management. In these circumstances, proceeding with exploitation would be
inconsistent with the principles of responsible, precautionary fisheries management.

We therefore strongly assert that the only defensible course of action is to revert to the
original proposal: full closure of the draft net fishery and implementation of a catch-
and-release policy for recreational anglers.

It is important to note that catches in previous years have greatly exceeded the currently proposed surplus. Allowing fishing activity under these conditions' risks surpassing sustainable limits and undermining conservation objectives. Management decisions must prioritise long-term stock recovery and ecological sustainability over short-term opportunity.

This is fundamentally a conservation issue. Responsible stewardship requires precaution, restraint, and a clear commitment to rebuilding stock levels. Any alternative approach would fail to meet the obligation to manage this resource sustainably for future generations.

4. Need for a Strong Precautionary Signal

Taken together, the increases in individual angling limits and commercial opportunities represent a dilution of precaution compared with earlier drafts. While each change may appear modest in isolation, their combined effect is to increase overall exploitation pressure at a time when stocks have little capacity to absorb additional risk.

The regulations should err firmly on the side of caution, recognising that conservation failure will be far more costly — ecologically, socially, and economically — than temporary restraint.

5. Policy Position on Exploitation and Precaution

Finally, we wish to clearly restate our overarching policy position in relation to exploitation of wild Atlantic salmon at this time.

Given the continued and well-documented collapse in salmon abundance since 2007, current management must prioritise stock rebuilding over all forms of exploitation. This requires the progressive removal of commercial netting operations, a further reduction in recreational exploitation, and the issuance of more explicitly precautionary scientific and management advice than is currently proposed.

In particular, the probability thresholds used to determine river openings and allowable exploitation must be strengthened again, not relaxed. Where uncertainty exists — whether due to marine survival, climate impacts, altered run timing, or mixed-stock fisheries — that uncertainty must be resolved in favour of the fish. The probability factor of achieving conservation limits should be increased to provide a genuine buffer for error and to ensure sufficient spawning escapement across all river systems.

It is important to stress that this position is not ideological nor permanent. In the event of a demonstrable and sustained recovery in salmon stocks, increased exploitation can and should be revisited on the basis of robust evidence. However, this is emphatically not the situation today. This is not 2007. Salmon stocks have plummeted in the intervening years, and the margin for management error has effectively disappeared.

At present, the system requires more spawners, not more removals. Any regulatory framework that increases exploitation — whether commercial or recreational — risks locking in further decline and delaying recovery for another generation.

6. Conclusion

In conclusion, we support the overarching aims of the Draft Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2026 and acknowledge the effort to balance conservation with continued access for anglers and commercial operators.

However, we urge the Department to:

- Reduce individual angling limits to 3 Tags.
- Reduce the allocation of tags to 21 Day licences.
- Daily limit of one fish should be incorporated in regulations.
- Avoid further expansion of commercial exploitation. No commercial exploitation or recreational exploitation should be considered on Owenwee and Owentocker in the Letterkenny District as surplus is fragile and unmanageable.; and
- Retain the closure of the Castlemaine Harbour commercial fishery in order to protect vulnerable component stocks, particularly the River Maine.
- A maximum size limit should be incorporated in recreational fisheries with 65 cm deemed to be appropriate. The scope to introduce this in commercial fisheries may not be possible but should be encouraged.
- Again, we reiterate our opposition to any commercial exploitation and emphasise that the state actively signals its intent to discontinue licensing of this practise.

A genuinely precautionary approach now will give Ireland's wild salmon the best possible chance of recovery and will strengthen public confidence that management decisions are being guided primarily by long-term conservation needs.

13 February 2026