

132

---

**From:**  
**Sent:** Sunday 1 March 2026 13:54  
**To:** DCEE IFD Public Consultations  
**Subject:** Draft 2026 Wild Salmon and Sea Trout Tagging Regulations - Submission  
**Attachments:** Submission.pdf

**CAUTION:** This eMail originated from outside your organisation and the BTS Managed Desktop service. Do not click on any links or open any attachments unless you recognise the sender or are expecting the email and know that the content is safe. If you are in any doubt, please contact the OGCIO IT Service Desk.

Dear Minister,

Please see our attached submission on the draft 2026 Wild Salmon and Sea Trout Tagging Regulations.

Kind regards,

132

01<sup>st</sup> of March 2026

Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2026

**Re: Submission on the Proposed 2026 Salmon Regulations – with Particular Reference to the River Blackwater (Co. Waterford)**

To whom it may concern,

Thank you for the opportunity to comment on the proposed 2026 Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations. I support strong and science-based conservation measures, and like many anglers, I want to see wild salmon thrive once again in Irish rivers. However, I am deeply concerned that the current regulatory approach places almost the entire burden on recreational anglers while failing to tackle the real pressures driving salmon decline—especially on the Munster Blackwater, where the situation is becoming increasingly serious.

Below, I outline specific concerns about the Blackwater, followed by broader issues that must be addressed if Ireland is to meaningfully protect its declining salmon populations.

**Munster Blackwater Reclassified to Catch & Release Only in 2026**

Under the draft 2026 regulations, the Munster Blackwater (Lismore district) moves from “open with harvest surplus” in 2025 to Catch & Release in 2026.

Anglers will comply, as we always do. But this change must be acknowledged for what it is, A severe restriction placed on a user group that is not responsible for the river's current decline.

**The 2025 Blackwater Fish Kill: A Warning That Cannot Be Ignored**

In August 2025, the Munster Blackwater suffered a catastrophic fish kill, one of the worst in modern Irish history. Over a 30 km stretch, thousands of fish died: trout, salmon, eels, lamprey and more. Anglers estimated up to 40,000–50,000 fish lost. Inland Fisheries Ireland confirmed mass mortality but could not conclusively identify the pollutant.

This incident:

- Was not caused by angling,
- Shows how fragile and vulnerable the river has become,
- Reflects ongoing water-quality issues, runoff, and inadequate enforcement,
- And should be prompting major investment in habitat and water protection, not simply more restrictions on rod anglers.

If the Blackwater is to be saved, water quality and pollution control must become urgent priorities.

### **Man-Made Barriers Are Damaging the Blackwater and Many Other Rivers**

Across Ireland, but especially on the Munster Blackwater, old weirs, poor fish passes, and culverts severely restrict access to spawning grounds.

These barriers:

- Block or delay migration
- Exhaust fish before spawning
- Reduce genetic diversity
- Disrupt natural river processes
- Fragment whole river systems

Many are non-functional remnants of past industry, yet they continue to damage salmon stocks year after year.

Barrier removal is one of the few proven, high-impact conservation measures internationally.

Ireland urgently needs:

- A full national inventory of barriers
- Prioritised removal of obsolete structures
- Properly designed fish passes where necessary
- Dedicated funding and timelines

Until this happens, salmon numbers cannot recover, regardless of how strict angling regulations become.

### **Anglers Already Do Their Part, But Restrictions Alone Do Not Rebuild Stocks**

Anglers have accepted:

- Catch and release
- Barbless hooks
- Bag limits
- Tagging systems
- Closed days
- Closed rivers
- Tightened bye-laws

We have done so responsibly and willingly.

But evidence shows angling restrictions alone are not enough.

The River Dee in Scotland, after 30 years of near-universal catch and release, still collapsed in 2015 due to marine mortality, predation and environmental pressures, despite anglers having almost zero exploitation.

This demonstrates an essential truth, you cannot conserve salmon in the river while ignoring what is happening at sea, in the estuary, and in the catchment.

Ireland must learn from this.

**The Real Drivers of Decline: Pollution, Marine Mortality, Predation & Habitat Loss**

If Ireland wants wild salmon to survive, we must confront the actual causes of decline:

*Pollution*

Agricultural runoff, sewage discharges, chemical pollution, and sedimentation degrade spawning and nursery habitat. Enforcement remains inconsistent and under-resourced.

*Marine Mortality*

Mixed-stock fisheries, trawling, netting, warming seas, and shifting prey availability have hugely reduced survival at sea.

*Predation*

Seal populations at river mouths, bird predation and estuarine predators have exploded.

*Habitat Degradation*

Drainage schemes, channelisation, riparian damage, and increased storm events reduce the river's natural resilience.

None of these pressures are caused by anglers and none will be solved by tightening angling regulations.

**A National Hatchery Programme Should Be Reinstated**

Used properly and guided by science, hatcheries can:

- Supplement rivers where natural recruitment has collapsed
- Support vulnerable or recovering systems
- Rebuild stocks after pollution events
- Increase smolt output while habitat is being restored

Hatcheries should not replace habitat restoration, but they can be a critical tool in a broader recovery plan, especially on heavily impacted rivers like the Blackwater.

132

### **Enforcement Must Improve**

Illegal netting, pollution offences, habitat destruction and non-compliance with environmental regulations are serious issues. Inland Fisheries Ireland needs:

- More staff
- More resources
- Stronger penalties
- Real authority to act

Conservation without enforcement is meaningless.

### **A Holistic, Long-Term Strategy Is Needed**

A credible national salmon recovery strategy must include:

- Pollution enforcement and water-quality protection
- Large-scale habitat restoration
- Barrier removal
- Marine survival actions
- Predation management
- Scientific hatchery support
- Climate adaptation planning
- Fair and balanced management of all sectors

Focusing almost entirely on angling restrictions, year after year, will not bring back salmon. It is time for a broader, evidence-based approach.

### **Conclusion**

I support strong conservation measures and will do everything I can as an angler to help restore salmon. But the current proposals place disproportionate emphasis on rod anglers while the biggest threats: pollution, marine mortality, barriers, and habitat degradation remain inadequately addressed.

The Munster Blackwater is a prime example. Its recent fish kill should have triggered urgent environmental action, not simply additional angling limits.

To protect salmon for future generations, Ireland needs bold, science-based measures that tackle the true causes of decline. I urge the Department to adopt a more holistic approach, one that prioritises habitat, water quality, marine survival, and enforcement, while treating anglers as partners, not scapegoats.

Thank you for considering my submission.

Yours sincerely,