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From: [REDACTED]
Sent: Wednesday 4 March 2026 12:24
To: DCEE IFD Public Consultations
Subject: Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations and Conservation Measures 2026
Attachments: Salmon regulations submission 2026,

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Hi,

I would like to submit the attached response to the proposed salmon and sea trout regulations amendments.

Regards,

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[REDACTED]

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Re: Submission on Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2026

I am writing to express my concerns regarding the proposed Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2026. While I fully support the urgent need for conservation measures to protect our declining salmon and sea trout populations, I believe the current proposals disproportionately target recreational anglers — a largely compliant, concerned minority — while failing to adequately address the primary drivers of stock collapse: Agricultural pollution, aquaculture impacts, and inadequate wastewater treatment infrastructure.

The proposed regulations — including the reduced bag limit from 10 fish to 3, the restricted harvest window, and the potential for future moratoriums — appear to frame recreational angling as a primary threat to salmon stocks. This framing is fundamentally misleading and ignores the overwhelming scientific evidence regarding the actual causes of decline. Based on the IFI's own data, anglers are responsible for just a small fraction of killed fish each year when compared to agriculture- or treatment plant-related fish kills such as the tragic incident on the Blackwater in August 2025.

This objection to the regulations is not in anyway questioning the evidence of stock decline. However, I contend that this collapse has occurred against a backdrop of:

- Consistently poor water quality: The EPA's 2019-2024 report shows that only 52% of Ireland's surface waters are in satisfactory ecological condition — a decline from 54% in the previous period. Of particular concern, 42% of river sites have unsatisfactory nitrogen levels and 27% have elevated phosphorus levels, both primarily attributable to intensive agriculture;
- Agricultural intensification: Ireland operates under a derogation from the EU Nitrates Directive, allowing farmers to apply manure above the standard 170kg nitrogen per hectare limit. This intensive livestock farming — dairy and beef production — is the acknowledged primary driver of diffuse pollution in Irish rivers. The Blackwater fish kill of August 2025, which local anglers estimate killed 46,000 fish over 30km including endangered eels, exemplifies this systemic failure. Despite inter-agency investigation, no perpetrator was identified and no prosecution resulted;
- Wastewater treatment failures: Ireland faces ongoing EU infringement proceedings for multiple towns — including those over 10,000 people — discharging inadequately treated wastewater into sensitive receiving waters. The European Commission referred Ireland to the Court of Justice in 2024, and the court ruled against Ireland in November 2025 (Case C-204/24) for failing to properly transpose the Water Framework Directive;
- Aquaculture impacts: Peer nations such as Norway have identified sea lice from fish farms as a major factor in declining wild salmon returns, with Norwegian salmon

populations hitting record lows and 40% of populations rated as having "very poor status" in 2024.

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In contrast to these systemic pressures, the actual impact of recreational angling must be viewed proportionately:

- In 2024, recreational anglers caught 16,457 salmon, of which 9,605 (58%) were released;
- Only 16,025 salmon licences were sold in 2024, and of those anglers, just 2,681 (16.7%) actually caught a salmon;
- The total angling harvest of 6,852 salmon represents a small fraction of the adult run compared to the mortality caused by poor water quality, disease, and habitat degradation;
- Licence sales have declined by 7.5% in just two years (17,318 in 2022 to 16,025 in 2024), reflecting both declining stocks and declining participation;
- The catch-and-release rate has risen from 56% in 2023 to 58% in 2024. This demonstrates that the angling community is responsive to conservation messaging and willing to modify behaviour voluntarily.

What could be done instead

I strongly support sustainable angling practices and believe the angling community should be treated as partners in conservation rather than scapegoats for systemic failures.

The proposed regulations do nothing to address the root causes of salmon decline. A reduction or moratorium on angling will not restore water quality, reduce agricultural nitrogen loading, or prosecute polluters. Instead, Ireland must:

- Establish real-time water quality monitoring systems that can rapidly identify pollution sources
- Prosecute industrial-scale pollution incidents such as the Blackwater fish kill with the full force of the law
- Accelerate investment in urban wastewater treatment to meet EU directives
- End the nitrates derogation

In concert with the above, we should educate anglers, and promote and incentivise catch-and-release practices, rather than restricting access through severely reduced bag limits and shortened seasons. It should not be difficult to fund comprehensive education for anglers on proper catch-and-release techniques, fish handling, and barbless hook use, along with the basics of river stewardship and simple steps that could be taken to monitor or improve water quality.

Ireland should also invest in proper data collection by engaging anglers as citizen scientists to collect data on fish health, water quality observations, and migration patterns through the use of a dedicated online platform. That we are still carrying sheets of paper on the river to record salmon catches in 2026 and posting them back to the IFI at the end of the season beggars belief. The angling community is a powerful resource that could be engaged nationwide to better protect and monitor our inshore marine and fluvial environments. An online platform could help train and resource anglers to conduct habitat improvement work, barrier removal, and riparian planting, as well as empower them to quickly report pollution incidents with guaranteed follow-up and feedback. It would also remove complications for meaningful consultation with the community on management measures

and regulations, before they are drafted, rather than after, saving everyone involved a significant amount of time and frustration.

We must address the real threats

Any regulatory package that targets angling must be accompanied by equally stringent measures targeting agriculture, aquaculture, and wastewater dischargers. Otherwise, the regulations are for the sake of optics. Putting restrictions on a small, compliant community while the actual drivers of decline continue unchecked will not resolve this crisis, and when we look back in years to come, this kind of performative time-wasting will be rightly condemned as a contributing factor in the destruction of a precious resource.

It is worth noting that while Ireland's water quality failures are not unique, they are inexcusable given our national wealth. Among the top 10 wealthiest EU nations by GDP per capita, only the Netherlands, Belgium, and Luxembourg have worse surface water quality than Ireland, and all three are far more densely populated and intensively farmed. Countries with similar or lower GDP per capita, such as Austria, Sweden, and Finland, significantly outperform Ireland on water quality because they have invested consistently in infrastructure and enforcement.

Ireland's declining water quality (from 54% satisfactory to 52% in the latest EPA assessment period) places us in a small group of EU states moving backwards rather than forwards. This is unacceptable for a country of our resources, and it is this failure — not recreational angling — that is killing salmon.

The regulations treat symptoms rather than causes. For this reason, I oppose them in their current form. They misdiagnose the problem, do nothing to tackle the worst offenders, and impose disproportionate restrictions on a community that is already demonstrating conservation commitment. I call on the department to:

- Reframe the regulations to acknowledge that water quality, agricultural pollution, and inadequate wastewater treatment are the primary drivers of salmon decline;
- Invest in angler education and catch-and-release promotion;
- Engage anglers as partners in river stewardship, habitat restoration, and citizen science;
- Accompany any angling restrictions with proportionate and enforceable measures; targeting agriculture, aquaculture, and industrial/municipal pollution;
- Commit to prosecuting major pollution incidents with the full resources of the State, as demonstrated by the failure to identify those responsible for the Blackwater fish kill.

Wild salmon and sea trout are a national heritage, an ecological indicator species, and an economic resource. Their protection requires us all to act honestly and courageously to diagnosis the problem and take collective action. Restricting a small community that would desperately like to be part of the solution, while pollution continues unabated, is neither honest nor courageous; it is disingenuous and short-sighted. I would hope that the IFI and the department can aspire to be better than that.

Kind regards,