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From:
Sent: Thursday 5 March 2026 16:28
To: DCEE IFD Public Consultations
Subject: Submission on 2026 Wild Salmon & Sea Trout Tagging Regulations

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A Chara,

The Protection and Recovery of Salmon stocks in Irish waters should be the primary aim and focus of ALL interested and vested parties, i.e Rod Anglers, commercial fisheries, land owners, tourism angling interests etc etc.

I note and welcome the fact that the Minister Mr [redacted] as instructed the IFI to seek further submissions and present further options to him 'up to and including a Moratorium on the harvesting of salmon'.

However this nuclear option is political suicide and will not happen.

The draft Regulations reply in the main on on scientific advice and IFI inputs. The science element I will not argue with.

However, several aspects of the IFI's input to the Regulations are a major cause for concern:

EVIDENCE OF DECLINING SALMON RETURN NUMBERS TO IRISH RIVERS are based on several methods - two of which are flawed:

LOG BOOK RETURNS: The low rate of return, the truth or otherwise of returns submitted, the lack of interest in submitting returns, the paper based system of submitting returns, the lack of an incentive to submit returns, the zero automatic 'feedback' to the rod angler...have all been highlighted since 2007. It cannot and should not be trusted as a reliable indicator of rod caught salmon.

FISH COUNTER DATA: Where they are installed they are effective and should provide a reasonable estimate for the SPECIFIC river they are monitoring. However for major rivers like The BARROW, NORE and SUIR, the BLACKWATER etc to have zero cameras in place and thereby be judged/rated on an entirely different river system makes zero sense. The initial financial outlay and maintenance and data capture and retention etc of Fish Counters is expensive - However If the downward trend in salmon numbers continue then in 5/10 years time the cost of installation and maintenance will be ZERO - because there will be zero salmon to count.

Prioritising the conservation of 2SW and MSW fish is paramount - shortened harvest season of 01 Jun to 31 Aug is welcome.

HOWEVER when 'fast-flowing gravel areas of rivers' is highlighted as a necessity for optimum salmon spawning conditions the 'conservation chain' is broken. On the river Barrow for instance spawning streams that were a hotbed of spawning activity 40 years ago now contain almost zero spawning fish. WHY? the gravel is no longer in the spawning streams, it has concreted and hardened and salmon cannot lay and cover eggs on concreted river beds..

It is noted from the IFI website that 11 Km of instream Rehab was completed in 2025 - Yes it is an expensive and complex operation to make all spawning grounds fit for purpose once again but leave it for another 5/10 years and the rehab costs will be ZERO - because there will be zero salmon spawning.

The commercial fisheries and netmen are stakeholders and interested parties to the 2026 Regs - They also harvest the highest % of salmon caught per season year on year and this will not change under current and proposed regulations. The financial buyout of these stakeholders will be expensive, subject to legal challenge and take years....By not proceeding down the 'buy-out' route the monetary bill in 5/10 years will be ZERO - because no salmon will be available for harvest.

OPEN RIVER 2026; To be an 'open river' in 2026 means something is going right for salmon in that particular river. WHAT IS GOING ON IN THAT PARTICULAR RIVER THAT OTHER RIVERS ARE LACKING? Find the answer/answers to this question and implement it on rivers that are almost but not quite meeting the quota and hopefully cascade it down successfully to the closed rivers..... Yes all river systems are unique but at least try and pilot research to prove or disprove the concept.

In summary:

Cutting the harvest numbers for rod and commercial fishers is welcome.

However if it is not followed up with major financial , scientific, technical and manpower assets etc then it will be deemed a failed 'salmon rescue' endeavour.

Make the river spawning streams fit for purpose once again.

A total revamp and rethink of the Log Book Scheme - what is its present purpose and desired result? It was rolled out in 2006/2007 and things have changed since then but the Log Book scheme has not kept pace.....

Invest for a bigger network of Fish Counters throughout Ireland.

Yours sincerely

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Dublin

18/11/11