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**From:**  
**Sent:** Wednesday 18 February 2026 15:32  
**To:** DCEE IFD Public Consultations  
**Cc:**  
**Subject:**  
**Attachments:**

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To whom it may concern,

Please find attached our submission regarding new regulations for salmon catch and release.

Kind regards,

As an angling club we have supported the states management of the precious natural resource that is the Salmon species and have accepted the Angling regulations imposed on us anglers over the past two decades. We are concerned that the latest proposed regulation is ill founded and based on incomplete data. There are three sources of data used to calculate the health of the River Boyne Salmon stocks, and we believe that all three on their own are imprecise. We are shocked that now IFI taking all three imprecise sources together has provided a very poor reflection of the health of the Atlantic Salmon population in the Boyne System.

The three data sources are:

- 1. Fish counter
- 2. Logbook returns
- 3. Fry survey

The Fish counter in Navan had long been an instrument of miss calculation. It has laid fallow due to technical errors on several occasions and for long periods of time. The Fish counter covers a limited span of the river barely 25% and cannot operate during times on higher water. This results in 100's of salmon crossing the weir daily at points on the weir not covered by the counter. The Weir is located at Navan, some 25 kilometres up stream of the mouth of the Boyne in Drogheda. The Counter fails to calculate the considerable volume of Salmon that spawn downstream not crossing the counter.

Over the last three years the presence of a Seal at Navan has also influenced the return negatively. The Seal has strategically positioned itself at the fish counter and hunts Salmon as they wait for an opportunity to cross the counter. This invasive saltwater predator's presence has been left unchecked by the state agency responsible for protecting the Salmon. As a result of these two factors, we contend that the Fish Counter figure relied upon by IFI is inaccurate.

**Logbook Returns**

There has been a considerable decrease in the number of Salmon licences returned. This reflects the decrease in the number of logbooks sold. Over the last number of years there has been little to no policing of the rivers by IFI. It appears that due to either low staffing numbers or a change in policy from enforcement to research, IFI are not actively policing the rivers. No member of our Angling Club has had their Salmon licence inspected in a considerable time. This reduction

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in policing is resulting in a failure to purchase Salmon licences and in turn logbook returns are reduced. This is resulting in a false calculation in the number of Salmon being caught and released by anglers. With zero policing on the waters by IFI huge number of Salmon are being illegally caught and killed. These fish never get an opportunity to cross the fish counter or reach the spawning grounds.

### **Fry Survey**

There has been a dramatic change to our weather pattern over the last two years, and this has resulted in very low water levels at crucial times in the year when the fry survey is being taken. The Water levels in the Boyne system have reached such a low level that Irish Water has had to impose hose pipe bans in towns along the system including Kells and Athboy. The low water levels have effectively rendered the IFI fry survey redundant.

On the River Blackwater which makes up 25% of the sites which IFI sample on the Boyne system the water level reaches such a level that no fish could cross the Weir at Balmoral. When the IFI carried out its survey on the 9<sup>th</sup> of April 2024 the river level at Balmoral Weir was at 18.574 cumin's. IFI state that for fish to navigate the weir successfully a figure on 50 cumin's is required. The water level in the River Blackwater did not reach the 50 cumin's figure until the 4<sup>th</sup> of October 2025, 18 months after the survey was carried out! It is clear that the weir at Balmoral in Navan has to be removed to allow Salmon to navigate the system and reach their spawning grounds.

This persistent low water level would not enable Salmon to spawn in the survey locations which have been convenient to reach by IFI staff. The salmon driven by their instinct to reproduce seek out alternative spawning locations in deeper and less accessible locations to IFI staff. While the fry counting system employed by IFI is acceptable in "normal" years, not enough weight has been placed on the extraordinary weather and low water levels over the last two years.

Over the last 20 years a considerable investment has been made by the Recreational Angling clubs on the Boyne System into spawning stream rehabilitation. Funds have been drawn from the conservation grant and 1,000's of man hours in free time and resources have been invested by clubs in the protection and re-establishment of Atlantic Salmon habitat. We have lobbied IFI and OPW in relation to the removal of manmade barriers blocking the migration of Salmon and now the consequences are evident on the Blackwater at Balmoral Weir, blocking the path of Salmon. The habitat is there; the migration path is blocked.

We as a Recreational Angling Club feel that the close the river and not permit Catch and Release Salmon angling on the Boyne System is an indication from the Irish State, her agencies and their policies have failed and have now giving up on preserving our Natural Heritage and the Atlantic Salmon.

We would implore the Minister that does not abandon the Atlantic Salmon and the Recreational Anglers who champion her cause. We would ask the Minister to allow for catch and release angling, ensure that the fry surveys are conducted annually on the Boyne System and that the obstacles blocking the path of returning Salmon are removed.

Respectfully yours,