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From:
Sent: Saturday 14 February 2026 14:32
To: DCEE IFD Public Consultations
Subject: Second Submission to the Proposed Salmon and Seatrout Regulations for 2026
Attachments: IFI Second Submission Regs 2026 final document.docx

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Dear

Please find our second submission to the above proposed Salmon and Sea Trout Regulations for 2026.

Yours Faithfully

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estimated values, including raising values, substituted historical averages along with inaccurate data sets instead of a full and accurate fish count.

The culmination of these out-of-date practices is that final outcomes are not derived from direct stock counting but from many inaccurate assumptions. Decisions based on such methodology would be irrational in a legal sense as they are not supported by any evidence that can sustain the conclusions reached. Their methodology acknowledges significant data gaps, counter downtime and reliance on modeled estimated corrections. Compounding this, is the use of inaccurate and incomplete angler's logbooks returns.

Anglers Logbooks

An integral component of IFI's methodology relies on angler's logbooks which are inaccurate. The latest return rate for 2024 was only 48% and 2025 was less than 50%. This means under half of the data was not available for any meaningful conclusion that could be used towards a stock assessment process. **This was the only data used by IFI to assess stocks in the River Moy for the proposed 2026 regulations. This was confirmed by IFI in a meeting with them on the 20th January 2026. This in our opinion cannot be allowed to continue.**

If stock assessment continues to rely solely on anglers' logbooks for the River Moy in 2026 and the proposed regulations are implemented, it could result in the river's closure. With fewer anglers present in 2026, the number of logbook returns will decline and likely show an even lower catch rate than in 2025. Added to this there is no counter data for 2025 included in the stock assessment.

The system of incorporating logbooks in their current format to ascertain any statistics is therefore irrational, completely flawed and would not withstand a judicial review.

Fish Counters

It is our submission that only full and accurate fish counts obtained by properly functioning and comprehensive fish counter systems can provide a lawful and defensible basis for determining conservation status and informing angling regulations.

Commercial Fishing and Fish Farms

The latest TEGOS report states that Salmon stocks have reduced from over one million per annum in the 1970's to 200,000 in recent years, so why is there no mention in the prosed legislation to address the number of fish killed by commercial fishing? Additionally, what is being done to prevent fish farms from causing genetic weaknesses in wild salmon from escapees? Parasites and diseases from overpopulated fish pens also infect wild salmon whilst on their migration route to their natal rivers.

Conclusion

The methodology currently relied upon by IFI is not fit for purpose for statutory conservation decision making.

We therefore ask you as the Minister for Inland Fisheries to ensure Inland Fisheries Ireland install post data sonar collection counters that are used in many countries to ascertain accurate counts. This would eliminate the need for future submissions and delays in signing into statute any Salmon and Sea Trout regulations.

Submitted by