
From:
Sent: Wednesday 4 March 2026 15:15
To: DCEE IFD Public Consultations
Subject: Submission on Draft Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2026
Attachments: Draft Regulations submission 2026.docx

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Please find attached our submission on the Draft Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2026

Regards,

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Our committee and club members have reviewed the draft proposals for Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2026 and we have concerns arising from them.

... the main angling club in the Sligo district, our club was founded in 1926, 100 years ago.

We own fishing rights on sections of Lough Gill and the east side of Glencar Lake, on which we pay annual rates. We also have leased a section of the Glencar Lake from IFI (Fishery 20/3A) from IFI, for the past number of years. These are a huge financial outlay for our club, and show our commitment to managing the fisheries.

We try to provide affordable salmon angling on both fisheries and our membership is available to both local and tourist anglers. We also make day permits available on Glencar to cater to anglers passing through the area. Two boats are available for use on Glencar by both members and day permit holders.

As mentioned earlier, due to our financial outlays (rates and provision of services to anglers) we have an issue with the sudden and dramatic changes that occur when the regulations are made each year. A fishery can be open one year and closed the next, or Catch and Release restrictions can be put in place. This causes our club great difficulty in planning our finances for the coming year. When restrictions are put in place that reduce angling there is a corresponding reduction in membership which we rely on to fund the club.

Our club and its members, due to their presence on the waters act as watchdogs for environmental issues, spotting them as they occur or shortly afterwards, the presence of anglers also prevents poaching. Removing anglers and possibly clubs from the waterways prevents these interventions from taking place, thus allowing for an increase in undetected environmental events and poaching, which in turn is impacting on the conservation of salmon. These days most anglers return salmon caught, but they should be afforded the opportunity of keeping a fish if they wish. The numbers taken by anglers would not compare to the numbers lost if a pollution event was to go un-noticed, killing all stages of salmon life, and the insect life required to feed the salmon juveniles.

The data used in the calculation of conservation limits for a system is also an issue. There seems to be no clarity on what data is used. Is it fish counters, logbook returns, electrofishing results? There are no counters on either of our systems. Logbook returns are not credible as the data entered on them cannot be verified and a high proportion of logbooks are not returned. Another factor is with reduced numbers of anglers purchasing licences, due to restrictions, there will be less logbooks returned. Electrofishing is dependent on water levels and the whether it is actually gets scheduled to be carried out by IFI. The results of these methods has a

major impact on our club and its ability to function when restrictions are introduced based on them.

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Salmon angling restrictions have been in place on Lough Gill for more than a decade with no improvement in salmon numbers. While these restrictions have been in place, we are not aware of any enhancement or development works on salmon spawning areas. The restrictions seem to be the only method of conservation and obviously it is not working. Also Lough Gill has at least three seals resident on it, along with a major population of cormorants. These predators are killing all species of fish on the lake and nothing is being done by the authorities to remove them to protect salmon. Anglers are being impacted and punished for the decline of salmon, yet in this example nothing else has been undertaken to protect the salmon.

Our club question the effectiveness of these salmon conservation regulations, especially when there are no other enhancement programmes in place to work in conjunction with them to improve salmon numbers. Anglers are bearing the brunt of the so called conservation measures and are losing faith in the ability of the authorities to handle the situation in a credible manner.

Based on the above call for a rethink of how the conservation limits/measures are applied and, there should be obligatory development /enhancement works carried out by IFI on any system that is impacted by these measures.

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