

**From:**  
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Submission on second draft 2026 Salmon Regulations

I consent to my name and address and submission being published by IFI/DCEE.

Submission on 2026 Draft Salmon Regulations

Much of the points in my submission on the previous draft regulations remain valid in relation to the revised proposed regulations and I submit my initial submission as part of my submission on the new draft proposals.

The revised draft proposals do not address any of the shortcomings of the initial proposals.

1. They do not address the inability of the current log book and licensing system to provide accurate and up to date information to estimate individual salmon populations.  
With anglers contributing millions in conservation levies on their licences, this should be the bare minimum that the licensing system could be expected to deliver and must be a priority of conservation.
2. Introducing compulsory catch and release to protect multi sea winter fish, based purely on a temporal basis will not have the desired results. Size based limits would be more effective at protecting MSW as the peak month for their capture is within the window of allowable harvest under the proposed regulations.
3. Blanket bans on worm fishing will have a major impact on non salmon angling and will have a detrimental effect on angling tourism and the potential to diversify from salmon angling.
4. There remains no clear mechanism or targets for returning fisheries to a position where harvest is permitted outside of June, July and August. Even on fisheries with an identified surplus of Multi Sea Winter Fish.

Under what conditions will a return to harvest on rivers with a harvestable surplus be permitted and is there a scientific basis for these conditions?

5. The haphazard approach to changing the salmon regulations, where the proposed changes were only notified to the public in November, rather than at the end of the 2025 salmon season have resulted in a debacle that has done untold damage to Ireland's reputation as a salmon angling destination for visiting anglers and has further undermined confidence in the decision making processes of inland Fisheries Ireland among anglers and stakeholders.

6. There are no provisions in the draft regulations to ensure participation in salmon angling, already at an all time low, does not reduce further as a result of the increased restrictions on anglers and the complete closure of rivers.

7. No coherent case has been made to support the closure of rivers as a tool of conservation. Inevitably, closing rivers will only serve to further diminish salmon stocks, not increase them. No argument has been or proffered to demonstrate how catch and release angling is more detrimental to a fishery than its abandonment to poaching, pollution and predation.

The proposed 2026 salmon regulations represent the biggest shift in salmon management policy since the move to single stock salmon management and the ending of drift netting in 2007. Those changes came into force on January 1st 2007 and had been under consultation with stakeholders since April of 2005. Twenty months before the changes were introduced. The far reaching changes announced for 2026 will be introduced following a 30 day period during which stakeholders are invited to make a submission.

The 30 day submission process may be a box ticking exercise on decisions that have already been made and which have had no input from those who will be directly affected. Since the abolition of the regional fisheries boards to which representatives of salmon anglers and fishery owners were democratically elected. Decisions are now made with only token stakeholder engagement. The lack of stakeholder engagement directly impacts the quality of decision making in IFI, undermines trust in the organisation and in the perception of the organisation among sections of the angling community.

The current consultation period on the 2026 draft salmon regulations is a case in point. Not only were stakeholders given an entirely inadequate time period for consultation, 30 days. The advice on which the regulations are based, the TEGOS Status of Salmon Stocks and Catch Advice report, was only made available 5 days before the deadline for submissions. On the same day the report was made available, 2026 salmon licences went on sale. Anglers purchasing the 2026 salmon licences online had to agree to terms and conditions which included regulations that had not yet been signed by the minister and which were purportedly still under active consultation. Clearly the 30 day consultation period does not represent a serious attempt to engage with stakeholders.

The information on which the 2026 draft regulations are based must also be mentioned. Much is made by IFI of "citizen science", "engaging with anglers to collect crucial data for managing and conserving Ireland's fish stocks". IFI appeals to anglers to become citizen scientists while IFI collects less than half of the data from angler logbooks which is a core function of IFI under their remit for the collection and analysis of fisheries data under the 2010 Inland Fisheries Act and which they are legally empowered to collect.

Yet more than half of this data remains uncollected. The data that is collected is collated in the most inefficient manner, often leading to understandable human error while manually transcribing from a paper licence that has been exposed to waterside conditions for the best part of a year. What confidence can stakeholders have in decisions while no effort is made to improve the collection of the data on which those decisions are based.

There is also a clear connection between the recorded angling catch and the return rate of angler logbooks. The rate of logbook returns has plummeted from a high of 75% to a current low of 48.7%. The 5 years of highest recorded angling catch since the introduction of the salmon tagging scheme in 2001 are, in order of total angling catch 2010, 2008, 2007, 2012 and 2011. These 5 years had angler logbook returns of 71%, 69%, 65%, 75% and 72%. Giving an average logbook return rate of 70.4% for these 5 years. Conversely the 5 lowest years of recorded angling catch since the move to single stock management are, from lowest, 2024, 2023, 2014, 2019 and 2018. Giving an average logbook return rate of 56.8% for these 5 years, which apart from the anomalous year of 2014, represent some of the lowest logbook return rates recorded.

Only 30 of Ireland's salmon rivers have salmon counters. Often these counters, such as on the river Moy, offer only a partial count of salmon numbers. Given the lack of counters and the historically sporadic nature of fry counts from catchment wide electro-fishing, angler data is essential in assessing salmon stocks on Irish rivers.

Each status of salmon report and catch advice for the following year is based on the data from the previous 5 years. For example the current proposed changes for 2026 are based on angler catch data for the years 2021 - 2025. Angler catch data for the current season is not yet available so an estimate is made. This "estimate", making up 20% of the data is made each year and each year this estimate is inaccurate and must be corrected when actual logbook catch data becomes available.

This may not be a huge problem if the remaining 80% of the data was reliable. However this is not the case. The data that isn't simply estimated is based on angler logbook return rates that have fallen below 50%. In 2024 the highest number of fish reported caught and released by an individual angler was 124. Given that less than 50% of logbooks are returned there is a better than 50/50 chance that similar scale of catches from unreturned logbooks are never recorded. The non recording of catches on this scale would have a huge impact on the stock estimates of individual rivers.

These stock estimates are calculated based on the rod catch and the expected exploitation rate of each individual river. The exploitation rates currently being used date from 25 years ago with amendments made in 2008 to account for different estimated intensities in rod effort in individual rivers. 2008 was a year which saw the second highest recorded angling catch since the introduction of the tagging scheme in 2001 and a year in which 25% more anglers participated in salmon angling than today..

It is acknowledged that there are deficiencies in the exploitation rates currently being used in stock estimates. This led to an extensive review in 2017, however 8 years later the more reliable exploitation rates have yet to be included in models used to extrapolate salmon stocks.

There are serious deficiencies in the veracity of the rod catch data and the exploitation rates currently used to extrapolate salmon stock numbers in Irish rivers. This makes accurate stock assessment and therefore management advice, difficult and uncertain.

The proposed changes to salmon regulations in 2026 impose a 70% cut in angler tag numbers from 10 to 3. The harvest period for salmon in Ireland will be reduced from 9 months to 3 months and the use of barbed hooks, treble hooks and worms will no longer be allowed for two thirds of the angling season. The effect of this will be lower angler participation, as has been observed in other jurisdictions and lower salmon catches. As the open or closed status of rivers without counters is based on salmon catches, this will inevitably lead to a feedback loop of more restrictions on angling, less participation, less reported catches and more river closures.



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Better catch data can be gathered. Real time data that is comprehensive, complete and credible. Anglers have contributed millions in salmon conservation levies. They have done this by paying double in salmon licence fees for almost 20 years. When purchasing a licence and paying a salmon conservation levy anglers deserve to be provided with a licence that is fit for purpose and contributes to an accurate assessment of salmon stocks and their conservation.

One of the proposed changes in the 2026 salmon regulations is an abandonment of single stock management principles and a return to the mixed stock management approach which existed before 2007. No longer will rivers which have an identified surplus, over their conservation limit be permitted to harvest this surplus. Rivers such as the Drowes, which have an identified surplus of MSW fish in the current catch advice for 2026 will be under the same compulsory C&R restrictions as rivers below their Conservation Limit. Under the 2026 catch advice, even at the higher 95% probability of meeting CL, the Drowes' harvestable surplus of MSW fish exceeds the number of MSW fish currently harvested during the period January to June.

Instead of managing salmon on a single, individual stock basis, cogniscent of local conditions such as run times, All individual salmon stocks throughout the country will have the same period of harvest, restricted to the 3 month period of June, July and August. The logic for this is, ostensibly to protect multi sea winter fish. Despite the 2026 TEGOS report stating that "a significant proportion of the MSW can return to such rivers throughout the season. A crude specified time period ban on harvesting fish is proposed rather than more nuanced measures which would offer MSW fish protection throughout the season. That MSW fish are encountered by anglers throughout the season is evident from page 16 of the Report on Salmon Monitoring Programmes 2021 linked below.

<https://www.fisheriesireland.ie/sites/default/files/2022-03/report-of-salmon-monitoring-programmes-2021-funded-under-the-salmon-conservation-fund.pdf>

Assessments of MSW fish in Ireland are crudely based on the month fish are caught. This has led to the proposed closing of rivers to harvest from January to June. However, salmon life history analysis collated from thousands of scale samples shows that the peak month for catch of MSW fish is June, the second highest month for MSW catch is July. Both months are outside the mandatory catch and release period which is being imposed to protect multi sea winter fish. The salmon life history graph, figure 4.2 on page 16 of the report in the link above shows that the bulk of MSW fish are caught during the 3 month period when harvest is permitted under the new regulations.

This may be the reason that the Technical Expert Group on Salmon DO NOT recommend mandatory catch and release from January to June in their catch advice for 2026. The report notes that

**“Figure 7b presents trends in returning multi- sea-winter (MSW) salmon, including spring salmon which predominantly return from January to May inclusive. A moderately declining trend is evident in this stock component over the time series. However, the estimate for 2025 represents an improvement over 2023 and 2024.”**

The report further notes that it is inappropriate to manage fisheries on a national basis and emphasises the importance of river specific management to inform sustainable fisheries management decisions.



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**“It is important to note that overall trends in our salmon stocks summarised at the national or international scale do not necessarily reflect those observed in specific individual rivers where inconsistent trends can be evident in a comparable time period. Indeed, ICES have emphasised that national stock CLs are not appropriate for the management of homewater fisheries. This is because of the relative imprecision of the national CLs and because they do not consider differences in the status of different river stocks or sub-river populations. They recommend that management at finer scales should consider individual river stock status. This highlights the importance of evaluating the status of our stocks at a river-specific level as a primary basis to inform sustainable fisheries management decisions.”**

To recap. I would urge the minister to continue to manage salmon stocks in Ireland based on scientific advice and on an individual river basis. To follow the advice of the Technical Expert Group on Salmon for 2026 to allow harvest on fisheries above their Conservation Limit.

I would further urge the minister to restrict angler tag numbers to be used throughout the season. To urgently reform the licence system to allow for the collection of better data on which to base management decisions. This must be a priority and the angler funded conservation levy could be used to achieve this. To introduce a mechanism to allow for the review of any changes introduced in the 2026 season. To use more nuanced management tools for conservation of MSW fish rather than crude calendar based prohibitions on harvest. To reintroduce catch and release incentives such as badges and certificates that had been offered to anglers by IFI in the past but have since been discontinued. To improve stakeholder engagement in the decision making process and give proper consideration to the views of those involved in salmon management and angling in Ireland. To undertake a review of exploitation rate calculations and other factors informing rod catch based stock assessments to become more dynamic and accurate and reflective of angling conditions. To urgently undertake a cost benefit analysis for salmon stocks affected by the complete closure of salmon rivers. Is the potential fish mortality associated with catch and release angling greater or less than the number of fish lost to spawning due to the absence of anglers on the riverbank observing poaching, pollution and illegal fishing.

I would hope that the submissions provided by the many people who care passionately about the future of salmon and salmon angling in Ireland are given the attention they deserve and the views expressed are considered when deciding salmon management policy for 2026 and for the years to come.

