Bill Goggins

From: [redacted]
Sent: 14 November 2019 15:49
To: IFD Public Consultations
Subject: Conservation Measures for 2020 Season

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hello,

In relation to the River Lennon, you have this river marked as CLOSED for a few years now until May, however you do not provide adequate protection of this river and it has become a slaughtering session during this period. I have witnessed first hand locals killing fish in Watts Pool and all along the river. This has been reported several times to the local IFI office yet nothing is done. And here we are again for another year where the same will happen yet the real fishermen who do catch and release are punished .

This is not the only river this is happening on. If you close a river you leave it open to poachers unhindered. How are you supposed to justify the conversation methods when you allow a free for all in relation to poaching.

13 fish witnessed with my own eyes slaughter on the Lennon. Even when you put a river catch and release you do not offer proper protection duties.

I would like to have an official chat with someone in relation to this river as it's completely unacceptable that this continues. You take half of my license fee for the conservation fund yet nothing is done. Local clubs can't draw down the money.

Bill Goggins

From: [redacted]
Sent: 21 November 2019 21:13
To: IFD Public Consultations
Subject: Munster Blackwater

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To Whom it Concerns.

In recent light of the catch regulations for Salmon and Sea-Trout on the Munster Blackwater. I[redacted]object to the quota for 2020.

This new quota of 5,438 is not in any way or format protecting the astronomical decline on Salmon stocks. 2018 was a bad year due to drought but 2019 was an eye opener to just how bad the Salmon runs have become.

As the largest fishery on the Blackwater and on light of your recent publication of the quotas for the coming season 2020 we have set our own catch restrictions for the next angling season, see below.

1. Catch limit of 3 fish Per year, Per Angler.
2. Salmon over 8lbs to be returned
3. Only one fish per day, all season.
4. Full Catch and Release in August and September

Since we announced these restrictions the support we have had has been nothing short of outstanding, and in recent days have had Careysville Fishery follow suit.

I would like to ask Mr Sean Canney to please implement these restrictions on the full river and preferably Nationwide. Salmon are a dying species and we need to act now before it is too late.

The days of harvesting 10 salmon per angler, per season are well gone and I ask you to please make a stand on protecting this wonderful species that so many businesses depend on to earn a living.

I look forward to hearing your response.

Kind regards

[redacted]
Ballyduff Bridge Salmon Fishery
[redacted]

Bill Goggins

From: [redacted]
Sent: 27 November 2019 16:01
To: IFD Public Consultations
Subject: River Lee

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Ms
Can you please provide me with an explanation as to why the salmon quota for the lower Lee has been reduced from 1,786 for 2019 to 1,072 for the 2020 season. What figure are used to determine the quota?

Regards

[redacted]

[redacted]
Ireland
Phone [redacted]
Mobile [redacted]
Email: [redacted]

Bill Goggins

From: [redacted]
Sent: 27 November 2019 22:10
To: IFD Public Consultations
Cc: info@salmonwatchireland.ie
Subject: Proposed Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2019

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir / Madam,

I am very concerned with the published proposal that draft net fishing (4,552 combined total) take place in the common estuary of the rivers Caragh, Laune and Maine in 2020. I question the proposed Total allowable catch of 4,209 for the Laune including the Cottoners in its combined estuary with the river Maine which has a proposed allowed catch of 343. What basis in science were these figures arrived at? Specifically I would like to know when last the fish counter at Riverville on the river Maine has worked as i have been informed that it has not been functional for a number of years?
The so called "reduced" Total allowable catch "to reflect the higher risk associated with meeting the individual river conservation limits simultaneously" has no sound Scientific basis if numbers of returning Salmon to the River Maine cannot be established annually with credible counter figures.
In the absence of counter figures are electric fishing samples the method used to prove that conservation limits are being met? If not what Scientific methods are used as the basis for the allowable catch figures arrived at for this specific river?
Anecdotally anglers as well as casual observers of the river will tell you that returning salmon numbers in the River Maine appear to have crashed in recent years. Although I admit that this anecdotal evidence alone is not a scientifically sound way of establishing the crash in returning numbers of Salmon, I feel in the absence of transparent alternative figures that the precautionary principle be used as opposed to the status quo exploitation figure year on year.

The continued unaltered allowable levels of commercial draft net salmon fishing in Castlemaine Harbour do not reflect the observed drop in returning Salmon in my opinion and only risk accelerating the reduction in numbers below conservation limits. In the absence of counter numbers to prove that conservation limit numbers are actually proven to be achieved anually in the River Maine, the continued unchanged level of exploitation of returning Salmon in the combined fishery of Castlemaine Harbour will only accelerate the unsustainable crash of the population.

I appreciate that the livelihoods of licenced fishermen would be affected detrimentally by a reduced (or total prohibition of any) allowable catch however I feel that adequate compensation should be provided as an alternative to save the Salmon from extinction in Kerry Rivers in our lifetime.

I hope you will accept and appreciate that my observations are with the best of intentions in attempting, in a fair way, to do what's most scientifically sound to protect Salmon numbers. I would like to reiterate my hope that fair commensurate compensation should be provided for the fishermen that would be affected by a total or partial prohibition on commercial salmon fishing in Castlemaine Harbour. I feel this is the only hope that wild Salmon can be preserved for future generations in the Kerry and Irish rivers given all the other uncontrollable factors at play in salmon mortality.

Yours sincerely.

Bill Goggins

From: [redacted]
Sent: 28 November 2019 06:41
To: IFD Public Consultations

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

I come since 30 years on the Moy ,and known great fishing between 90 and 2005 .Since a few years the trend is bad ,particularly this year ,with a lot of net marked fish .
I just can speak about the Moy ,but if we have new restrictions ,fewer and fewer people will come .I am myself waiting to book the boat and my house to come in 2020 .When there is a problem ,I know that anglers always pay the bill ,even if they are responsable of nothing .About the Moy ,I have spoken with a fishery officer who told me that a lot a net poachers have been caught in the estuary (I don't speak about the nets on the river) .If I can give you an advice ,don't punish anglers ,because you will kill local economy in Foxford .Regards.

Bill Goggins

From: [redacted]
Sent: 28 November 2019 10:59
To: IFD Public Consultations
Subject: Day Fee

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Why not reduce the day licence fee as it would encourage more visiting anglers to stay over. I have friends from Scotland who would love to avail of salmon fishing when over but find the day fee high. I myself would probably salmon fish more if the day fee was more attractive. Or have a visitor day fee which could be proven by address on purchase. Even reduce the fee if 2 days are fished to make it more attractive.

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Any email including its content may be monitored b[redacted]For more information on our Privacy Notice, please see the following lin[redacted]
Communication by internet email is not secure as messages may be intercepted and read by someone else[redacted]annot guarantee that this message or any attachment is virus free or has not been intercepted and amended. You should perform your own virus checks.

Bill Goggins

From: [redacted]
Sent: 29 November 2019 19:21
To: IFD Public Consultations
Subject: Salmon and Sea Trout Regulations

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Minister

I have carefully read the proposed regulations for the 2020 season.

In 2016, a bye-law was passed (943 2016 from memory) prohibiting the taking of any sea trout (not just those over 40cm) from certain rivers in the south-east, including the Colligan and Avoca. I suggest that this bye-law be made more obvious on available sources of information.

Additionally, I suggest total catch and release of all sea trout and salmon on all rivers, with fishing limited to the use of single barbless hooks, and no bait allowed including worms and prawns/shrimps.

Our stocks are in crisis. I believe this is the least we should do to help.

Thank you for the regulations, and for your consideration of my suggestions.

[redacted]

Bill Goggins

From: [redacted]
Sent: 01 December 2019 21:02
To: IFD Public Consultations
Subject: Salmon Regulations 2020

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

As a local angler on the Suir I and the majority of anglers on the Suir are delighted that this river remains catch and release only for 2020. Everyone is aware of the serious situation facing this wonderful fish, I believe that Ireland should take a lead and ban all commercial exploitation of this endangered species and rivers which have not been meeting the minimum stock levels should not be considered for opening other than catch and release until the minimum stock level has been exceeded for at least eight years. I and many others travel to Canada every year at considerable cost to fish for Salmon (always C&R) .We would be happy to spend that money in Ireland but it is getting harder every year to find Salmon on our native rivers. A recent poll taken in our club the largest on the Suir found 90% supported C&R going forward, other clubs have had similar results.

[redacted]

From: [redacted]
Sent: 05 December 2019 10:53
To: [redacted]
Subject: Draft Salmon regulations 2020: Crana Brown tags

Hi all,

The Buncrana Anglers Association committee have met and discussed the proposed brown tag scheme for the Crana river for 2020.

After some discussion the decision of the committee is that we will not be accepting 99 brown tags for 2020 as we believe the salmon need at least another year to recover. We will review this decision again next year on foot of IFI survey results.

Thanks

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Bill Goggins

From: [redacted]
Sent: 10 December 2019 12:45
To: IFD Public Consultations
Cc: hughbarry2014@gmail.com; Colin Bateman
Subject: Draft sea trout and salmon regulations 2020

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

RE ; ARGIDEEN RIVER, CO. CORK.2020.

Dear Sirs/Madam,
I have been an active member of the Argideen Anglers since 1974.
I have kept the club records of Sea Trout catches by our members since then.
The valuable information in our records was used by Eddie Fahy in his book, "Child of the Tides."

Over the years the Argideen Anglers have worked with the SWFB to improve and enhance our fishery. A disabled access was put in place and it is used every other day in the season.

Basically we have always been a Sea Trout Fishery, and remain so to this day.
Our fishing is night time fly fishing for sea trout. Only 3 members of the club fish for salmon and trout in the day with a worm.
Last year 2019 there was a great run of sea trout in the river with fish in the 3-5lb. Size running through our fishery to pools a few miles up the river.
Our membership is about 80, but only 6-12 members fish at all.
Last year they caught up to 250 sea trout between them. I don't think any were over
40 cms. Most of the fish are returned by members.

If the river is catch and release next year it will have a very negative and significant impact on club membership and fishing activity of the river. Many members will not bother to take out a license or pay their club membership fees. There will be very little footfall on the river banks and members will not be able to deter poachers or inform the fishery board of poaching activity. The anticipation of maybe connecting with a salmon during a flood, the one and only salmon you may catch in a year will be gone.

Surely IFI is there to encourage fishing, I trust you will reconsider your intention to make the river catch and release next year, And OPEN the river for fishing and trust in the club members and the SWFB officers to look after our wonderful resource.

Thankyou for your attention.

[redacted]

Bill Goggins

From: [redacted]
Sent: 10 December 2019 19:02
To: IFD Public Consultations
Subject: FW: salmon situation river Suir

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

From: [redacted]
Sent: Wednesday, December 4, 2019 10:50 AM
To: IFDPublicConsultation@DCCAE.gov.ie
Subject: salmon situation river Suir

I am sending this email on behalf of the Clonmel and District Salmon and Trout Anglers Association to express our agreement to open the Suir for catch and release only. As a club of close on one hundred salmon anglers we know that there are not sufficient numbers of salmon coming into the Suir to allow for harvesting. A recent survey of our members found that the vast majority of those questioned support catch and release at least until there is proof positive of increased numbers of salmon coming into the system. We feel that the conservation limit needs to be exceeded by a decent number for a few years consecutively. This club has invested ten thousand euros over the last five years in spawning stream development and we feel that this natural spawning will improve the number of salmon coming into the system, It is in all our interests to do what we can to preserve the Atlantic salmon for future generations. [redacted]

IFDPublicConsultations@DCCAE.gov.ie.

Submission re Public Consultation on Wild Salmon and Sea Trout Tagging Scheme Regulations 2019 and Conservation Measures for 2020 Season

I am making this submission on behalf of the Net Fishermen of the Feale, Galey and Brick rivers. I have been duly authorised to do so. The Fishermen and I have read and researched the Draft Wild Salmon and Sea Trout Tagging System Regulations 2019 and we have considered the position of the Inland Fisheries, the Anglers and the Boats in relation to the current Public Consultation which closes on the 13th of December 2019.

We note the proposed Total Allowable Catch in Schedule 2 in relation to the Feale, Galey and Brick rivers. The position is that the rivers are to remain as Catch and Release. This seems somewhat unusual. We understand that a certain level of salmon need to pass through the counter to sustain the relevant rivers. We also understand this to be the known Conservation Limit which is taken on a five year rolling average. Recently, we have obtained the IFI figures in relation to salmon passing the counter. We have taken those figures and the average over a five year period. We must now assume, based on those figures which have significantly increased, that a surplus is present and the fishermen may use their nets from the 1st of June 2020.

If this is not the case, then please provide the basis for deciding a designation of Catch and Release. Please provide the figures, the formula and the evidence that clearly demonstrates and substantiates the decision.

[redacted] Net Fishermen of the Feale, Galey and Brick Rivers
12th of December 2019

IFD Public Consultations

Inland Fisheries Division
Roinn Cumarsáide, Gníomhaithe ar son na hAeráide & Comhshaoil
Department of Communications, Climate Action & Environment
Teach Leamháin, Bóthar Ghleann an Iarla, An Cabhán, H12 A8H7
Elm House, Earlsvale Road, Cavan, H12 A8H7

I have been asked by the **Cork and District Inshore Draft net Fishermen** to review the method by which the quota was arrived at.

I approached Inland Fisheries Ireland for relevant data and was told that I would have to apply to the Consultation on Wild Salmon and Sea Trout Tagging Scheme Regulations 2019 and Conservation Measures for 2020 Season group for information. I did this and just had an acknowledgement of the email sent. Inland Fisheries Ireland informed me that they would have to wait for a response from the Department of Communications, Climate Action and Environment before they could supply me with information.

The result is that I obtained no information on the figures used to provide the quota. This is not a fair and transparent system. Data should be freely available to stake holders.

In the absence of data I summarise that the catches from angling and draft net catches provided are averaged over a number of years. A notional number is subtracted each year for the reared fish component of theses catches. This then provided a quota for wild salmon.

The quota is then very unfair and penalises the draft net fishery because a high percentage of their catch is reared fish. Figures recorded by the fishermen in 2005 showed figures over 50% of their catch were reared. They would only reach half of the quota allowed for wild fish if they catch the full TAC.

In determining their allowable catch therefore an adjustment should be made to allow for their catch of reared fish which are not part of the quota. They could double their catch and still be complying with the wild fish quota. Some adjustment could provide them with a potentially higher catch while still protecting the wild salmon.

[redacted]

[redacted]

On behalf of

Cork and District Inshore Draft Net Fishermen

IFD Public Consultations

From: [redacted]
Sent: 13 December 2019 11:17
To: IFD Public Consultations
Subject: River Suir Catch & Relevances

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sirs

I am writing in relation to the Consultation on Wild Salmon and Sea trout tagging scheme regulations 2019 and conservation measures for 2020 season on the river Suir catchment.

We are the largest tourist angling operator on the Suir catchment offering both salmon and trout fishing packages to anglers from all over the world. This brings valuable revenue to our area for hotels, restaurants, pubs and shops. [redacted]

I fully support the continued catch and release on the River Suir as salmon numbers are not anywhere near where they need to be in order to begin harvesting fish. If there was a deviation from catch and release it would send completely the wrong message internationally to our customers as fish numbers are in such a fragile state.

Also as a fishery owner on the river Suir I would like to see numbers of fish recover to a much better state before granting a quota is even considered.

Yours sincerely

[redacted]

Sean Canney T.D.
Minister of State
Dept. of Communications,
Climate Action and Environment.

[redacted]

18th Nov. 2019.

[redacted]

Dear Sean,

I have just read the Consultation Document on wild Salmon and Sea Trout. [redacted] I have fished the River Suir for 60 years (since I was 4 years old). I also wrote the book: The River Suir A Blue Riband River for Trout, Salmon Fishing. The biggest Salmon caught in Ireland was captured 10 miles from my house.

The Suir will be catch, release again from 1st January 2020. The Suir has been C+R for nearly every year since the beginning of the new Millennium. I notice that the Galway Corrib has a catch of 57%. I fished the Galway weir and half the salmon I caught came from the Cong Hatchery - Adipose fin clipped. The fee for the Galway weir, as you know, went up by a huge percentage in 2018!

There is a salmon Hatchery on the Suir which cost €59,124. Local anglers donated €30,000 of it. It is closed. While western anglers can fish and have an open hatchery we have nothing. Why?

From[redacted]
Subject: Fishing

Message Body:
Dear Mr cannery.
In relation to the River Lennon in Donegal it closed till may 12th this year again for catch and release while the river has a potential of up to 1000 fish spawning per year.now if you work out the maths on how the River in falcarragh had 10 spawning per year and that's open for catch and kill could you please explain this to me.im only saying this cause when the men out fishing honestly are keeping the poachers away from the river Lennon.In regards to this is inland fisheries not able to manage there area cause of shortish of man power.And an other thing is tourism industry which would bring along substantially more revenue to yous if the River was open early.
Ps.Do you fish if not then your getting wrong information of the men on the ground.
All the best Mr canney.
[redacted]

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This e-mail was sent from a contact form on Sean Canney (http://seancanney.com/newsite_sc)

SLANEY RIVER TRUST

Sean Canney T.D.,
Inland Fisheries Division,
Department of Communications, Climate Action and Environment,
Inland Fisheries Division,
Elm House,
Cavan Town,
H12 A8H7.

26th November 2019

Emailed to: IFDPublicConsultations@DCCAE.gov.ie

Ref: Observation/Objection to Draft Wild Salmon and Sea Trout Regulations – River Slaney

Dear Minister,

We are writing to you on behalf of anglers, riparian owners and fishing clubs along the River Slaney.

Firstly, we would like to sincerely thank your department for your support throughout the year. In particular the significant progress, as a result of your department, Ciaran Byrne and IFI and the Slaney River Trust working together, on the important issues along the river. The main priority of which has been the Clohamon tailrace issue.

The purpose of this letter is to submit our observations on the proposed opening to salmon fishing on River Slaney in 2020. While we welcome your proposals to open the River Slaney to salmon fishing on a catch and release basis in 2020, we are writing to request that you open the season earlier, to the 1st March rather than 1st April. This request follows the resounding success of opening the river earlier in 2019. However, it was not early enough as the 1st April falls in the middle of the main salmon run.

Opening the river had a positive impact on the river as anglers out fishing managed to curtail illegal poaching. Opening the river increased the level of interest from anglers who form such a crucial part in the management and protection of the river on numerous environmental fronts. The importance of anglers is something we have no doubt you are acutely aware of, but when the river was closed, this all but killed the interest of anglers on the River Slaney. This interest is being slowly built back up and by opening the river on the 1st March we are confident that this would be a hugely positive step in accelerating this vital interest.

SLANEY RIVER TRUST

The protection offered by legitimate anglers during the season was significant and we feel that presence should be there in March 2020 when the Spring run commences. In 2019 we were aware of high numbers of poachers along the banks prior to the 1st April (when legitimate anglers were not permitted to fish) with easily caught fresh fish taken and killed. A presence from anglers during March, combined with the superb and committed work of IFI, will make life an awful lot more difficult for these poachers.

With catch and release widely accepted by IFI's senior scientists as a highly effective conservation measure, we would ask that the Bye Law for the river Slaney be amended in 2020 permitting fishing for salmon on a catch and release basis from the 1st March rather than 1st April. The nett result will be an increased interest from legitimate anglers along the river and a lower mortality rate of the venerable Slaney spring salmon.

We very much hope you see the merit in our observations and implement what we see as a minor but crucial adjustment to what we feel is otherwise a sound policy. Many thanks again for your continued support.

Yours Sincerely.

[redacted]

[redacted]
Slaney River Trust

Office: Ballybawn Lane, Rathnure, Enniscorthy, Co. Wexford.
Committee: R Burgess, (Chairman), B Connolly, D Dobbs (Treasurer & Deputy Chairman), R Harvey, T Mernagh (Secretary), K Murphy, D Ryan, N Scott, K Whelan, C White

Slaney Rodfishers Association is affiliated with Slaney River Trust Ltd.

Tralee and District Anglers
Association,
Cloghmackirkeen,
Doon,
Tralee,
Co. Kerry.
[redacted]

06/12/2019

Submission to IFD Public Consultations,
Dept. of Communications, Climate Action and Environment,
Wild Salmon and Sea Trout Regulations 2020.

To whom it concerns

The above association wishes to make the following submission in relation to a recommendation by the Consultation on Wild Salmon and Sea Trout Tagging Scheme Regulations 2019 and Conservation Measures for the 2020 Season public consultation process. The submission will specifically address the proposal that the River Feale catchment remains as a catch and release entity.

We acknowledge that the River Feale has suffered diminishing salmon runs that are reflective of a much wider uninterrupted trend in falling salmon numbers for almost two decades. Moreover, we have also previously stated that where the River Feale is concerned the situation of falling salmon numbers has been exacerbated by commercial netting. The quota system in recent years has shown that the viability of commercial netting must be questioned. The prevailing assumption is that under-reporting of salmon catches in the past by this sector could be the only valid reason why it remained commercially viable and why its suspension under recent change to regulations was not welcomed by the commercial sector. Figures supplied by Inland Fisheries Ireland (IFI) show us that in 2018 the fish counter on the Feale fishery indicated that 3615 salmon ascended the river - this was the last year of a harvestable quota with an allocation of almost 400 salmon awarded to the netting sector. The 2019 figures to hand have revealed that 5426 ascended the river through the fish counter – this shows an increase of 1811 salmon, a 50% upsurge. These figures support our contention that the increased numbers of salmon registered by the counter would indicate that netting activities exceeded their quota and distorted actual salmon numbers entering the river catchment. Tralee and District Anglers Association (TDAA) are supportive of a continued pausing of commercial netting on the catchment in 2020 as suggested in the proposed regulations. It will be important that if salmon stock numbers are to be given any fair chance of recovery on the River Feale, commercial harvesting of salmon will have to permanently cease.

Anglers have always been supportive of initiatives that sought to conserve and enhance salmon stocks along with protecting water quality and riverine habitat. In the current setting, we must not lose sight and consider salmon management policy as being broadly influenced by returning salmon numbers. Whilst the Wild Salmon and Sea Trout Regulations for 2020 specifically deals with available stock management it would be remiss of TDAA not to comment on the lack of a coherent strategic plan to ensure the conservation of both salmon and its habitat. Statutory bodies designated

with the management of various elements associated to our fisheries only act in accordance with their remit and as a consequence, their effectiveness is restricted. This submission would like to take this opportunity to restate TDAA view in that going forward government bodies need a strategic initiative that includes greater interagency cooperation to not just minimally conserve our salmon numbers but to grow them in terms of real abundance.

Yours in good faith,

[redacted]

[redacted]

I write primarily as the Secretary of the River Moy Trust which gained its charitable status earlier this year and additionally as a concerned salmon and sea trout angler who has been fishing the Mayo and surrounding areas for the last 30 years.
We are all sadly aware that the run of Atlantic Salmon has declined dramatically and with that foremost in our minds we believe it's necessary to write to you to express our concerns and offer some suggestions for your consideration. We appreciate that some of these ideas have been raised before however we would ask they are reconsidered given the current situation. Additionally we asked that this letter is considered as a response to your draft document for the season next year.

1. IFI's Consultation Document
We have read this draft document for the forthcoming 2020 season and pleased to see that in particular the river Moy has had its harvested fish numbers reduced, however how do you know if this threshold is reached and what action would be taken to prevent the further killing of Salmon? I am sure we can agree that anglers' returns are far from accurate!

2. Fish Counters
We would like to raise the thorny issue of fish counters as the Moy Catchment Association (MCA) has written to IFI before on this subject. As they say in business "If you can't count it, you can't measure it." The same applies to our salmon stocks. The last 2 years I have fished various locations in Alaska in the USA where fish stocks are counted with sonar. As a result, 3 of the major rivers in the Anchorage bowl area were closed through the entire season during 2019. This closure was published through websites and media outlets in January this year with an apology for the hardship it would cause to communities, businesses, guides etc. None the less it was done for conservation!
Having spoken to biologists in Alaska, conservation is their primary objective and is achieved making accurate fish counts resulting in informed and appropriate decisions. Can you agree that accurate counting should be considered as 'best practice'? We know the use of sonar requires post data counting but you would have correct data on which to base your surplus figures etc. Some rivers have either a Logie or Vaki counters including the Moy, however the 'Queens Gap' has neither. Many salmon use this gap to enter the non-tidal stretch of the Moy and therefore are not counted. Your previous response to the MCA cited regulation 107 of the Consolidation of Fisheries Act (free passage of fish etc) as being one of the main reasons for not using a counter at this location, however you allow 2 anglers to fish directly in front of this gap! This is known on your fishery as the Weir Pool. Is this not a breach of the same regulation as the anglers are standing directly in the Queens gap where fish are attempting to pass?
The methodology used by IFI to ascertain the numbers of fish entering a river without a full count in our opinion is inadequate to provide the surplus numbers of fish that can be harvested and to make informed conservation decisions. The placement of 2 sonar counters, one above and one below the joining's on the Moy in the Cloongee and East Mayo Anglers fisheries would provide a full count. The difference between the 2 counters would provide the numbers of fish entering Loughs Cullen and Conn. If you are serious about conservation, then a proper reliable count must be achieved and not estimated using the current method which includes anglers returns which I stated above are totally inaccurate. Perhaps IFI are concerned that the actual figures would be cause for concern, i.e. the actual run of fish is lower than estimated? If this was the case surely it is better to take remedial action now rather than to wait until it is too late to conserve the fish stocks?
In our previous letter relating to counters the MCA offered resources to assist with the post data counting which would be treated as confidential. This offer still stands.
Although angling in Ireland produces a huge income for local communities, businesses, taxes for the government etc, surely you must agree that the emphasis must now be placed on conservation and

not income generation? The Trust has not ruled out the possibility of purchasing its own counters and providing the figures to IFI should European funding present itself. Both East Mayo Anglers and the private Foxford fishery have agreed that counters could be placed in their waters if the need arises.

3. National Strategy for Angling Development Fund. (NSAD.)
Although available to angling clubs many of the smaller clubs have limited funding, therefore it is impossible to make an application due to the cost, for example a Rural impact Assessment. In fact, I made this point at the Ballina hotel at the funding presentation given by IFI. Even if a club has the funds for the Rural Impact Assessments, they may still be declined the funding! It doesn't work in its current format.
Can the application system be reviewed? Currently it is beyond the reach of many clubs and simple projects such as stream enhancement cannot be undertaken due to lack of funding. Perhaps a presentation process or a written application could be the way forward so that all costs are covered by the NSAD fund? IFI as the agency responsible for administering the fund would make the final decision. We would therefore ask that the application process is reconsidered and changes are made to streamline this procedure and make it accessible to all fishing clubs regardless of their funding abilities. Could an application proforma be devised to cover all the requirements for applying under this fund? We have seen the recent publications where clubs have made successful applications to the fund which is encouraging.

4. In stream Development
One way of developing a rivers ability to increase salmon stocks is to enhance the spawning beds by placing gravel at strategic locations thereby enhancing the redds. I am pleased to say our Trust has been asked by our local IFI in Ballina to supply locations on the Moy where this can be done.
Is it possible that IFI's resourses are directed to take ownership of enhancement and development of streams, rivers and particularly spawning beds throughout the ROI, considering the decline of the salmon runs? This would go some way to assist those clubs that need financial assistance to improve their own spawning areas until such time that the NSAD is made available to all.

5. Technical Equipment
Human resources are the costliest part of any business and wondered if IFI have fully explored what other technology is suitable for the detection and prevention of offences under the Fisheries Act? I am not asking to know what you use as that would be counterproductive, however we are aware that drones have been deployed to some extent but there is a plethora of surveillance equipment that may be of use to you. Obviously, privacy laws must be complied with such as warning of CCTV etc.
Have you considered publicising a reward system for information given to IFI leading to the successful prosecution of an offender/s at court?

6. Reduction on the number of Tags Issued
Reduce the number of tags to 6 or 7 for example and after those fish have been harvested an angler must fish catch and release? This would also exclude the use of worm as a bait which is a very effective way of killing fish (as indicated in your own website) and used by many anglers. (see 9 below) An alternative is to issue three tags of a different colour which could only be used from the opening day of the season on any river up to the 11th of May. (spring fishing) The remaining 7 tags are then blue as usual. Many anglers only visit for the run of Grilse therefore they would be restricted to 7 tags. This in turn should reduce the number of salmon that are harvested throughout the season.

7. Purchase of Tags and Licence

Your current system allows the same angler to visit numerous retail outlets for the sale of logbooks and tags and obtain as many licences that they wish as your technology is not capable of detecting multiple sales of tags to the same person. I.E. 10 tags per angler per season. Have you considered investing in a system that will prevent this breach? We would advocate that photographic ID should also be shown at the time of purchasing a licence.

8. IFI's Websites

Your website titled Angling Ireland, states that anglers are prohibited from selling salmon (any size) or sea trout (any size) caught by rod and line and goes on to say that these guidelines have been prepared for information purposes only and do not purport to be a legal interpretation.
Another IFI website states "It is illegal to sell salmon or sea trout over 40cm between 1st January and 31st October. Does this mean that rod caught salmon and sea trout can legally be sold if they are under 40cm? I have recently spoken to Marcus Muller who has informed me that IFI are in the process of renewing their websites and ambiguities such as these will be clarified.

9. Smolts

Some rivers in Scotland operate what is known as a smolt shepherding program. Put simply they use crow scaring devices or any other method during the smolt migration to keep cormorants away from the smolts. If our understanding is correct this period only occurs for 2/3 weeks in every season. Has this been considered as a viable method in the ROI? In the Moy estuary alone, there is a reasonably large population of seals, some of which are often seen in the centre of Ballina in both in the Cathedral and Ridge Pool beats eating salmon. We appreciate this is a very sensitive subject but has any scientific research been carried out to establish the numbers of seals and the damage they cause to salmon and sea trout stocks? This situation is compounded by the numbers of cormorants that feed in the same area.

10. Worm Fishing

As published recently in the Western People newspaper the salmon catch returns for 2019 were a little over 4000, this being a 20% reduction on the 2018 figures, is it therefore appropriate to ban worm fishing on the river Moy? A worm hooked salmon in most cases is a dead fish as the hook is deeply set and of course this is in direct contravention of the regulations to protect the killing of kelts. In the same article it was mentioned by Cllr John O'Hara that the river needs to be dredged between Ballina and Foxford. We sincerely hope this is not the case due to the potential damage this would cause to angling in that area. The other statement made by Cllr Annie May Reape in relation to putting wild salmon back on the restaurant menu was also reckless as this may open discussions as to how this could be achieved. (please item 12 headed netting below)

11. Enforcement

Fishery Officers have the power to use on the spot fines for 150 euros which we as a Trust and anglers fully support, however our opinion is that this method of dealing with minor fishery offences should be maximised to deter such offenders. Some local abusers of the fishing regulations have no respect for conservation and Fishery Officers. Do you also have the power to seize the angler's rods, reels, lines and more importantly their vehicles? If so, is this done as a matter of routine? With the more serious offences which are taken to court do you ask for destruction or forfeiture orders of offender's vehicles and fishing equipment if they are used in the commission of the offence? (nets are obviously dealt with by a destruction/forfeiture orders) In other words take a more hard-line approach to deter these groups or individuals if the law allows you to do so? Sometimes we see local press releases where court sentencing is far from satisfactory and wondered if IFI's CEO or representative has a good working relationship with court clerks to discuss these issues and raise your concerns? Discuss the use of public funds at court etc.

If the Trust can be of any assistance in these cases, please let us and we will contact local media outlets to express our disappointment along with your own.

12. Education

From the comments made in the Western people recently in relation to the dredging of the Moy and the ability to purchase salmon in restaurants it's clear that there is a lack of understanding locally of the real issues that relate to one of Ireland's greatest natural resources. Comments such as these do nothing to create confidence in the ability of the decision makers to resolve our dwindling salmon stocks. Perhaps IFI could run an open forum or workshop in the Ballina area as part of an education program to enlighten all interested parties?

Education for farmers could be another theme. The Trust could assist with this process as one of our Trustees is a farming consultant. Booklets could be produced informing them of the situation and how they could help.

The trust has recently purchased 6 cattle drinking troughs which are in the process of being installed throughout the catchment thus removing some cattle from the river Moy and preventing bank erosion and pollution at these locations.

Have you considered Stream Scapes as a project for schools and signage adjacent to local playgrounds and schools such as the ones used in other countries such as the USA? In our opinion education is key, not only for children but adults. By its very nature it is a slow protracted process, however without investing in people, you will never achieve a change in attitude.

13. Netting

We can see no social or economic reason for net licences of any description to remain in force given the current position of our salmon stocks. We are aware that rod and line anglers catch returns far outweigh those of salmon killed through netting hence our suggestion above to reduce the number of allocated tags per angler. Having said that, we would ask that all netting is ceased as a conservation measure. Some netting has been traditionally passed from generation to generation however as stated above it is our belief that conservation must be prioritised at all cost. Is IFI or the Government able to prevent these nets from being used?

We understand that funding and resources are not infinite, however could consideration be given to rolling out some of the strategies outlined above on a catchment by catchment basis? This may establish what can be achieved, what works and what doesn't and perhaps best practices in relation to conservation?

We look forward to hearing from you in due course and welcome the opportunity to discuss in person any of the issues that we have raised. If there are any meetings in relation to salmon conservation the trust would welcome the opportunity to attend, particularly those that were mentioned in the Western people by local Councillors.

Yours faithfully

[redacted]

[redacted]

Secretary Moy Rivers Trust

[redacted]

CAHIR & DISTRICT ANGLERS ASSOCIATION

[redacted]

Susan Campion
IFI
Anglesea Street
Clonmel

Iascach Intíre Éireann
Inland Fisheries Ireland
25 NOV 20
Clonmel
Received

12th November 2019

Dear Ms Campion

Re: Salmon Tags for 2020 Season on the River Suir

We are pleased to hear the conservation levels for salmon on the River Suir has been reached this year.

The members of our club fee it is now time for the anglers to be given tags for the 2020 season.

Cahir and District Anglers have been adhering to the catch and release policy and changing angling bylaws over the last 20 years. We as a club do not believe that the anglers on the Suir are to blame for the salmon's plight and strongly feel that there are other major issues that need addressing and should have been acted on long before any of the angling restrictions were applied to the anglers.

We are probably one of the oldest and largest clubs on the River Suir and manage, on a voluntary basis, around 30 km of fishery on the Suir and Aherlow rivers.

It is very frustrating and disappointing to see our beautiful river and its flora and fauna under so much pressure. It really is time for radical change from government as to how our rivers are used and affected by strong money making lobbies. There are industries, agencies and councils that, it is sad to say, show very limited concern for the welfare of the rivers they are directly or indirectly affecting. In the last 50 years the river has been under constant pressure, like a slow cancer, its quality and the habitat it provides for the flora and fauna has been severely impaired. If we act now, this fantastic river will recover very quickly and be the wonderful natural asset in Ireland that it should be.

Yours in angling with hope for the future,

[redacted]

09 Dec 2019

Re: Draft Catch and Release Proposals for Garavogue System Co. Sligo for 2020

Dear Minister Canney,

Our committee and club members have reviewed the draft proposals for the Garavogue fishery for 2020 and we are disappointed to see that the fishery is designated as Catch and Release for the coming season. We have concerns and objections arising from this.

We own fishing rights on sections of L. Gill, on which we pay rates, and lease the fishing rights on the river section in the town. We also have leased a section of the Bonet (Fishery 20/3B) from IFI, which is part of the Garavogue system, for the last number of years. These are a huge financial outlay for our club, and show our commitment to managing the fishery and making angling accessible to local anglers.

One of our concerns is how are the figures calculated? Are catch returns from log books the only figures used when calculating the conservation levels?

In our opinion the logbook returns are not a reliable method to calculate the health of the system. As the Garavogue was C+R from the 12 May 2019 we suffered a reduction in rod effort for the past season. In fact our membership was down from 210 members in 2018 to 178 in 2019, of which the majority of that are anglers who fished the town section of the system.

The Garavogue town section runs through the centre of the town and has high pathways along the banks with high railings. The main hole is at the arches of a road bridge and the anglers fish from the bridge on the pavement alongside the road. There are limited access points into the river and because of its contained state, within the high walled banks, wading opportunities are limited as the water remains high and fast moving even with moderate rainfall. Due to these reasons the river is primarily a worm/spinning section and only a small few anglers fly fish it. Also the proximity to road traffic and pedestrians along the river banks make fly fishing very difficult. As we had C+R regulations in place for 2019 the worm/ spin anglers did not fish it. This lead to a much reduced rod effort on the most productive section. Local IFI fishery officers can verify this.

With fish numbers relatively steady for 2019 and having had a reduced rod effort on the fishery this would show that if worm/spinning was allowed, angler numbers would increase, and the catch returns would be higher than they are projected for 2019.

Another issue that impacts salmon angling on the most productive section is a by-law that has the river closed until the 01 Jun. There are only 4 months of the 9 month season in which we can fish the section. This greatly reduces our ability to increase catch returns when the town section is assessed on less than half the season applied to the rest of the fishery.

In 2019 we had a quota until 12 May which allowed our club fish on L.Gill and run our 3 traditional competitions, some of these are being fished for over 60 years. Trolling is the method used to fish on L.Gill and if C+R is imposed we will be unable to fish the lake. The method of trolling with Spoons or

Devon baits with single barbless hooks, as required when fishing C+R, would not work, the baits would

not fish correctly when the original hooks are replaced with a single barbless hook. Anglers know that it is not worthwhile trolling under C+R restrictions and therefore it will effectively close fishing on the lake.

Our club are asking that the proposed decision to apply C+R for the whole season be reconsidered. At a minimum the same restrictions as imposed for 2019 should apply. In 2019 the deficit was 13 fish below the CL and it is not significantly different for 2020. Potentially there would be a surplus had we been allowed to fish worm/spin as explained earlier.

Whilst logbook returns may be a straightforward method for calculating CL we argue that it is too simplistic and does not take into account the real world of angling and the unique difficulties impacting the fishery as outlined earlier.

Our understanding is that when the Conservation level were first proposed a number of years ago a number factors were to be used in the calculations, wetted areas, counter figures, electrofishing and red counts. Are any of these, or a combination of them applied to the Garavogue system? This would give a more holistic view rather than relying on anglers returning logbooks. It is well known that anglers not returning logbooks is an issue in many regions including our own.

In Summary we are objecting to a full C+R designation due to the following factors:

- The inability for fish worm/spinning due to C+R and the difficulties in fly fishing on our most productive section reducing the rod effort and therefore fish numbers caught.
- The reduced season available to fish on our most productive section.
- If we cannot troll L.Gill it will reduce our figures even further.
- Are only catch returns used in the CL calculations? They are not reliable due to anglers not returning logbooks.

As a club the restriction on fishing on our owned and leased waters, causing reduced member numbers, will lead us to have to reconsider our financial commitment to angling in the local area. This is not an outcome that either IFI or our club would find satisfactory.

Regards,

[redacted]

IFD Public Consultations

From: [redacted]
Sent: 11 December 2019 22:09
To: IFD Public Consultations
Subject: Argideen River Catch and Release.

Follow Up Flag: Follow up
Flag Status: Completed

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sir/Madame,

As chairman of the angling club Argideen Anglers Association I have been asked to communicate the members concern at the designation of this river catch and release and question the justification of this designation considering the healthy stocks observed by the members throughout the previous seasons.

The Argideen is fished by fly almost entirely at night, for seatrout, and the vast majority of trout returned leading to low recorded catches.
That said good bags of fish have been caught when conditions suit during the recent seasons.
There are three local members who day fish for salmon mainly when water levels are high. They took fish this season and report good numbers of fish in the river running through to the upper levels.
The catch and release designation will curtail their sport and they currently serve a vital role in keeping an eye on illegal activity and liaising with the fishery officers when problems occur.
It should be noted that healthy runs of fish are tending to head rapidly through the lower stretches where most angling activity takes place.This almost certainly due to silting and shallowing of lower pools part caused by recent larger floods depositing material! Historically the association remedied this problem by periodic deepening of pools, (not an option now.)
This has impacted to an extent on fishing effort and catches but the consequence is that very healthy stocks are to be found in the upper river and spawning sections. The fishery officers who patrol the river will confirm this and I have discussed and confirmed this situation with them.
I would propose that redd counts when conditions allow would confirm this perhaps backed up by electro fishing as further evidence to support the healthy stocks in the Argideen and question the justification of this designation.
It is important to encourage active angling clubs who by their presence on the river monitor both poaching and pollution activity and are usually the first aware of a problem when it occurs, discouraging anglers leaves the river less protected and fish more vulnerable to losses.

As a point of reference my personal best bag night angling occurred back in the 1980`s of 14 seatrout kept for one night. My second best bag 9 seatrout in 1 hour last season all returned.
My largest personal salmon on the river taken in 2018 while night fishing for trout 11-5lbs returned also even though my fishing effort a fraction of effort in the `80`s & `90`s.

I realize that is not a remotely scientific indicator but perhaps an indicator of the quality of stocks in the river.

We would ask that you would consider the suitability of catch and release for the Argideen and respectfully request that through redd counts
and contact with officers on the ground that the designation be reconsidered.
If assistance from the club with the above would help please let us know.

[redacted]

TO: MINISTER IN THE DEPARTMENT OF COMMUICATIONS, CLIMATE ACTION AND ENVIRONMENT

REF: CONSULTATION ON WILD SALMON AND SEA TROUT TAGGING SCHEME REGULATIONS 2019 AND CONSERVATION MEASURES FOR 2020 SEASON

The Secretary,

River Maine and Brown Flesk Anglers' Association,

Castleisland,

Co Kerry.

5th December 2019

Dear Minister Canney,

We are confronting an ecological disaster of epic proportions on the River Maine and Brown Flesk. The number of salmon encountered by anglers is now at unprecedented low numbers. Such is the concern that The River Maine and Brown Flesk Anglers' Association must act as custodians of this river. The club have taken the unprecedented step of applying a catch and release policy for the 2020 season. This policy will only benefit this once prolific salmon fishery if the IFI also act and apply a catch and release policy throughout the fishery, and implement the immediate cessation of commercial fishing on the Maine and Castlemaine harbour.

The Proposed 2020 TAC figures of 342 salmon for the Maine and 588 salmon for Castlemaine harbour are absolutely ludicrous. Anecdotal evidence from anglers suggests that these numbers will far exceed the total number of salmon entering the river over the entire season. The number of salmon entering the Maine over the last number years is considerably less than the conservation limit set aside for this river.

The number of anglers in our club is continuously decreasing on an annual basis as anglers are simply not encountering salmon on the river. The club has a total of 35 members for the 2019 season, with only one angler from the club encountering salmon on the river. This angler caught two grilse (3-4lbs) on the River Maine in the month of September. No angler from the club encountered salmon on the Brown Flesk River. The very survival of salmon on the river is now at a critical juncture, Minister.

The fish counter located on the River Maine has been recording unverifiable data since its installation over a decade ago. The club is strongly contending that the exorbitantly high, unverifiable salmon count numbers recorded on this fish counter are highly inaccurate. Unverifiable data is quite simply worthless and should be discarded when implementing policies that will determine the survival of salmon on this River.

The spring salmon numbers of 1233 for the 2017 season and 1458 for the 2018 season are incorrect. The club contends that a large percentage of these spring salmon, are actually sea trout. This can be corroborated by the photo that accompanies this submission.

This illegal cage was encountered by club members approximately 800 metres above the fish counter in the Brown Flesk River on the 5th of May 2017. Ten sea trout (2-4lbs) were found in the cage, and they were released by a staff member of IFI. Five of the sea trout had sea lice, which suggest that they were in fresh water for no more than 24-48 hours. This would also suggest that this cage was being serviced a number of times per week. Therefore, this would account for prolific numbers of large sea trout on an annual basis. Sea trout of this size are being recorded as salmon by this unverifiable fish counter.

Our club committee has met with IFI staff (Macroom office) on several occasions over the last four years to express concern regarding the near total decimation of salmon on the River Maine and Brown Flesk. A commitment was made by IFI staff, that cameras would be installed at the fish counter to verify all salmon and sea trout numbers. At the time of making this submission (Dec 2019), this commitment has not been honoured.

George Orwell reminds us "sooner or later a false belief bumps up against solid reality". The reality Minister is that you need to act urgently on the recommendations as set out in this submission:

1 Catch and release policy for the River Maine and Brown Flesk.

2 The Immediate cessation of commercial fishing on the River Maine and Castlemaine harbour.

3 The Immediate installation of cameras at the fish counter located on the River Maine. This measure is required to distinguish between salmon and large sea trout.

4 A comprehensive electro-fishing survey on the River Maine and Brown Flesk to commence in 2020.

Minister, you have the power to act as custodian for this once great river and protect it for future generations. Failure to do so will result in the younger generation asking "what were you thinking Minister, why didn't you act?"

[redacted]

[redacted]

SUBMISSION FROM THE BARROW, NORE, SUIR SNAP-NET FISHERMEN'S ALLIANCE

on the

Draft Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations and Conservation Measures for the 2020 Season

December 2019

Snap-net fishing for salmon has been carried out on the Three Sister Rivers (Barrow, Nore & Suir) in southeast Ireland for over 1,000 years. It is possible, for example, on the River Suir, that this method of fishing predates the time of the Vikings, since the cots used in the lower parts of the Suir river are keeled, like those in use by the Vikings who settled in Licketstown in Carrigeen in county Kilkenny, opposite Woodstown on the Waterford shore where there was an extensive Viking settlement, and quite unlike the flat-bottomed cots used elsewhere. Today snap-net fishing takes place from Grannagh Castle (two kilometres downriver from the Woodstown Viking settlement) to just above Carrick-on-Suir in County Tipperary.

There is no other region in the country where snap-net fishing is practised and there is no other fishing method like it, except perhaps in the tidal estuaries in Wales where coracle fishermen use similar traditional techniques but a different boat type (a coracle is small, light and rounded and covered with calico, which is waterproofed with a bitumastic paint). Coincidentally, the coracle fishermen, like the Irish cot men, use the word 'pill' to mean a river tributary in their own respective areas. (Fishing for sea trout or 'sewin' using traditional coracle boats on the rivers of west Wales was awarded special protected status by the European Commission in March 2017). The importance of snap-netting was recognised in 2019 as an element of the *National Inventory of Intangible Cultural Heritage* fulfilling Ireland's obligations under the 2003 UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage, which Ireland signed up to in December 2015 to raise awareness of, and respect for, our unique living culture (see https://nationalinventoryich.chg.gov.ie/snap-net-fishing/).

A very low rate of exploitation is associated with snap-netting, as it is limited in operation by weather and tidal conditions; even in the bountiful years of the 1970s, snap-netting generally harvested a very small percentage of the stock nationally. It is also an inefficient method of catching salmon using a small net which is fished along the bed of the river between two small canoe-like timber boats called cots.

However, snap-netting as a traditional and unique method for catching salmon on the Three Sister rivers of the southeast of Ireland is now at greater risk of being lost than ever before as there is an ageing community of fisherman; several have passed away in recent years and several more may never fish again on the rivers because of their age profile. Consequently, opportunities to pass on the technique to the new generations is gradually being lost and the method may die out if the present necessary restrictions on salmon fishing in the tidal rivers of the southeast persist for much longer. However, it is important that snap-netting as an element of the cultural heritage of Ireland is continued to ensure the survival of a tradition and a fishing method in a society that protects and promotes its heritage and culture and recognises the valued links with past generations.

It is not clear in the scientific advice for a given year what importance is attributed to the various methods that are used in the calculations for that particular year; however, it seems likely that it is the rod catch alone that is used in the majority of rivers (including the Suir), and especially on rivers where there are no fish counters and no commercial fishing. The reliance on angling data has limitations, which may vary from year to year. In 2019, for example, because of low water levels on the Suir, there was very little angling in the month of July, and so no reliable data on salmon numbers in the system could be collected. While we accept that the model and methods used in calculating the Conservation Limits and the TAC allocation is reasonably robust, despite its deficiencies and is in use for several years (and so results from it are comparable between years), we are beginning to despair if we will ever be allowed back snap-netting and that the fishermen themselves will die out before we are allowed to resume fishing. If this happens all the skills that are needed for this ancient, unique and inefficient form of fishing for salmon on the Barrow, Nore and Suir will be lost forever.

The Suir was slightly above its Conservation Limit in 2019 and is around the same level for 2020. We are hoping that a small quota or TAC will be available to us for the 2020 fishing season, which would enable snap net fishermen to return to fish the rivers as their ancestors did down the generations. It would also provide valuable and reliable data on stock levels in the rivers that could be pooled with data gathered from other sources, and reduce the over-reliance on limited angling data, which might improve the scientific advice for subsequent years. We would be delighted to accept a small quota or TAC for 2020 and to co-operate in any regime that would be deemed appropriate in gathering reliable data on stock levels in these rivers.

SALMON WATCH IRELAND

"Dedicated to the restoration of salmon abundance in Ireland"

Draft Consultation Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2019 for 2020

Sir,

Please find comments from Salmon Watch Ireland (SWIRL) in relation to the Draft Consultation Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2019 for 2020.

While agreeing with the overall approach by Inland Fisheries Ireland and Department of Communications, Climate Action and Environment, we are concerned as to the accuracy of data on certain catchments. The reasoning behind our submission is to improve data in order that management of river systems can be improved to allow a more robust understanding of the process by all stakeholders which may further improve confidence in overall conservation objectives.

In light of above SWIRL would specifically like to comment on the following catchments:

River Maine, County Kerry

- This catchment has a counter and our specific cause of concern is the purported number of Spring Salmon (up to end of May) which enter the system. As there is no verification of data possible (Data from this weir has been downgraded to un-verified due to the level of background noise on the weir) it is impossible to use this data to ascertain whether this catchment is exceeding its Conservation Limit. Furthermore the identification of species of fish crossing the weir is not satisfactory as underwater camera identification hardware is not in place. The river has in the past and indeed continues to have a healthy stock of large sea trout running the system in spring and it is contended that some of these fish may be included as spring salmon due to their size and signal strength recorded at the counter. Without camera verification it will be impossible to distinguish which species is crossing the weir during these early months.

Salmon Watch Ireland
59 Amiens Street,
Dublin 1
Post Code - DO1P786

- The rod catches of salmon in this river prior to the end of May against the counter figures do not demonstrate any correlation. The counter figures and rod catches are presented here in tabular form. Some fish may also be taken outside this period but numbers are still poor.

Year	Count to End of May	Rod Catches End of May
2015	374	5
2016	338	1
2017	1233	1
2018	1458	Not Available

- The Castlemaine Draft net and the angling recreational fishery on the river is dependent on there being a surplus in the River Maine and it would be catastrophic to the wellbeing of salmon in this river if this surplus were found not to exist but that the stock had been the subject of continued exploitation by commercial nets and recreational anglers.
- SWIRL requests that a thorough verification process is implemented on the River Maine counter with associated fish species verification cameras installed for spring 2020. SWIRL believes that implementing this verification process will improve and consolidate the scientific process and aid transparency going forward.
- In relation to transparency it is requested that stakeholders should be present at an organised calibration and verification process at the facility during spring 2020. SWIRL personnel would also like to be included.

Kerry Blackwater, County Kerry

In relation to the counting facility on this river, SWIRL has become increasingly aware of local concern regarding the accuracy of counts. Again there is no underwater verification system in operation and effectively the verification of fish crossing this weir is from an overhead video. This effectively does not verify fish as having crossed the weir in relatively benign heights of water. There is also local concern as to the management and maintenance of this facility. As a Reference Catchment for Ireland it must be managed and maintained to the highest degree. SWIRL requests that weekly management during the period June to September be a priority from 2020 onwards. In relation to transparency it is requested that stakeholders and SWIRL should be present at an organised calibration and verification process at the facility during summer 2020. It is evident that the local angling stakeholders are very involved with conservation and protection of this river and should be encouraged.

Kenmare River Catchments

SWIRL is concerned at large surpluses being allocated to Sneem River and the Sheen River. The exploitation rate used to extrapolate surpluses must be examined as currently allocated surpluses appear to not reflect accurately the numbers of fish in these catchments. While it is accepted that rod catch data is viewed as being accurate we would suggest that the overall exploitation percentage may be under stated as both catchments have substantial numbers fishing them as well as physical impediments within these rivers which may increase exploitation pressure.

[redacted]

Salmon Watch Ireland

11 December 2019

IFD Public Consultations

From: [redacted]
Sent: 06 December 2019 11:32
To: IFD Public Consultations
Subject: submission to the Wild Salmon and Sea Trout Tagging Scheme Regulations 2019

Follow Up Flag: Follow up
Flag Status: Completed

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern at Inland Fisheries Ireland,

6th December 2019

Ref. Objection to proposed "*Wild Salmon and Sea Trout Tagging Scheme Regulations 2019*" to be introduced in 2020

Blackwater Fisheries Group
[redacted]

The **Blackwater Fisheries Group** are responding to the document "*Consultation on Wild Salmon and Sea Trout Tagging Scheme Regulations 2019 and Conservation Measures for 2020 Season*" and exercising our right as stated within the document, to object to these proposals during the consultation period.
We represent around 50 kms of river bank on the River Blackwater from Mallow down to Lismore.
The **Blackwater Fisheries Group** are jointly objecting to the proposed quota (Total Allowable Catch TAC) of 5,438 salmon that can be taken by anglers and commercial nets on the Lismore (Munster) River Blackwater district in 2020 on the following grounds

1. We (**Blackwater Fisheries Group**) deem this figure to be completely unrealistic and non reflective of the actual number of salmon returning to the R.Blackwater over the last 6 years.
2. According to the latest SSC data produced in 2016 by Inland Fisheries Ireland (IFI) when the Munster Blackwater and it's tributaries where extensively electro fished, the findings stated the following *"The Blackwater had a mean catch of 13.56 salfry/5min in 2016 which is below the 17 salmon fry threshold"*.
3. We also base our objections on the declining numbers of salmon we and our rod anglers have caught and witnessed on the river since 2014.
4. This figure of 5,438 fish, does not show any element of conservation of Munster Blackwater salmon, which have been in significant decline since 2014 as well as nationally and internationally.
5. We feel our remaining wild salmon stocks returning to the R.Blackwater are so depleted in numbers, that reaching the conservation limit is of concern and stocks are unable to recover sufficiently under this present policy of exploitation.

6. Evidence of the salmon's decline is shown in the 2016 IFI survey **A.4.1.River Blackwater (Munster), including the Glenshelane and the Finisk** and subsequent smaller surveys completed in 2017 and 2018 on 2 other Blackwater tributaries (Funschion & Finisk) showing a marked decrease in salmon juveniles from previous years.
7. We strongly feel that greater effort needs to be made by the appropriate authorities in Ireland to conserve our remaining salmon stocks and not to continue to exploit them to the point of no return. A number of fisheries on the Blackwater are already introducing their own rod catch limits for 2020, which undercut the current legal Inland Fisheries Ireland limit of 10 fish/rod/season
8. The **Blackwater Fisheries Group** is very adamant that Inland Fisheries Ireland should not undertake moving over any surplus TAC quota from the rod angling sector to the commercial netting sector, in order to help meet the 2020 or future TAC quotas. Quotas not meeting expectations on the rod angling side would either be due to an increase in anglers returning more salmon in the interests of conservation or by a lack of fish numbers. Such a decision would be seriously detrimental to salmon conservation and would result is a huge public outcry.
9. The Blackwater Fisheries Group is happy to discuss other catch options, if that means all commercial netting and exploitation of wild salmon ceases on the Munster River Blackwater, until such times as stocks recover sufficiently and the situation is reviewed.
10. Finally and most importantly, we as the **Blackwater Fisheries Group** challenge this figure of 5,438 salmon (TAC) and how this figure has been reached. Our reasons are thus.....

- There is no fish counter on the Munster Blackwater (previous fish counter was removed over 8 years ago)
- The latest SSC 2016 data and subsequent smaller surveys done in 2017 and 2018, show a decreasing trend and alarming drop in salmon fry along the Munster Blackwater valley
- According to the most up to date electro fishing survey as part of the "**Water Framework Directive**" (i.e. surveys to establish numbers of juvenile salmon & trout on the nursery streams) in 2017 and 2018 Munster Blackwater tributaries R.Funschion and R.Finisk were surveyed and on both 0+ juvenile salmon had greatly declined from 2014 and 1+ juvenile salmon had disappeared completely in 2017 from both rivers. This shows that numbers of juvenile salmon were already in decline from 2014 on these 2 Munster Blackwater spawning tributaries.
- The gathering of accurate river catch totals is hard to achieve when there is a lack of information, a risk of human error and relying on honesty which could be swayed by concerns over future drop in quotas
- As the Total Allowable Catch (TAC) is such a critically important figure, it should be based on factual and accurate information. It also seems that SSC and Water Framework Directive findings have been ignored and the opportunity to consult individually with those involved in wild salmon commercially, privately and within the rod angling tourist sector on the Munster Blackwater has not been taken up. This can be easily achieved by asking the relevant parties to fill in a form, email or letter. This all helps to gain as much information as possible, which then leads to a more realistic and sustainable figure.

We look forward to hearing from you.

Your Sincerely

[redacted]

Blackwater Fisheries Group

[redacted]

[redacted]

Sean Canney, T.D.,

Minister of Department of Communications, Climate Action and Environment,

Inland Fisheries Division,

Elm House,

Cavan Town,

H12A8H7

21st November 2019

Ref: Objection to Draft Wild Salmon and Sea Trout Regulations 2019-River Slaney

Dear Minister

While I welcome your proposal to open the River Slaney to salmon fishing on a catch and release basis in 2020, I disagree with the proposal to delay the opening date to the 1st of April, on the following basis;

- The bulk of the spring run of fresh salmon takes place in the period from March to May, i.e. **prior** to the proposed opening date.
- The river is at its most vulnerable to poaching activity during this period, as these 'fresh' run salmon are of far greater value to the poachers than the fish that have been in the river for some time.
- The presence of legitimate anglers on the riverbank provides significant protection from poachers for our precious wild salmon, as well as valuable support to IFI staff who responsibility it is to police a vast area with limited resources.

I would encourage you to reconsider your proposal, and to open the river to salmon fishing on **1st March 2020**, rather than the proposed date of 1st April 2020.

I would also suggest bringing forward the closing date for Salmon and Sea Trout fishing to 31st **July 2020.**

Yours sincerely

[redacted]