

## Bill Goggins

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**From:** Raymond Broughton <carralife@gmail.com>  
**Sent:** 11 August 2021 10:11  
**To:** IFD Public Consultations  
**Cc:** Deborah Broughton  
**Subject:** Re: Consultation Response

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Dear Bill Goggins,  
Below is the letter that was in the attachment you were unable to open. Thank you for alerting me to the problem. I trust this submission format is ok.  
Kind regards,  
Ray Broughton

### BALLINROBE & DISTRICT TROUT ANGLERS ASSOCIATION

Carra Cottage,  
Moorehall,  
Claremorris,  
Mayo,  
F12 VF57

Email: [carralife@gmail.com](mailto:carralife@gmail.com)

7th August, 2020

Dear Sirs,  
Re: Designated Salmonid Waters Bye-Law No. XXX, 2021

I write on behalf of the 117 members of our Association, in the certain view that the issues raised below will be those that every one of our Trout Anglers would also raise as concerns.

This Bye-Law, by its title, would give the impression that, finally, Salmonids would be protected in waters "designated as wild salmonid waters." (Article 3.) However, the draft Bye-Law then contradicts any protection in the following articles. It is stated (Article 4.) that "The designated waters shall be managed **primarily** for the benefit of wild salmonid species". Primarily means "mostly", "chiefly", "for the most part", and is a very loose and open term that could be interpreted in vastly different ways, e.g. primarily could lead to, say, 90% salmonids and 10% various other species, but could be as damaging as 51% salmonids and 49% other species.

Annual Plans (Article 6.) are expected when what is really needed is more long-term planning, so that resources can be managed and budgeted for over a more sensible period of e.g. 5 year Plans. The I.F.I. can plan more long-term and build in their surveys of stocks, habitats and stream improvement. If the waters were to be truly "designated as wild salmonid waters", then there should certainly be a "number of fish designated for removal" (Article 6(c)). These would be the invasive coarse species that are predators of salmonids or in competition with salmonids for food sources, often destroying traditional trout feeding habitats.

This Bye-Law expects I.F.I. to present annual plans which will be based on objective surveys, data, knowledge and experience. But then, "The Minister may, before approval, amend stock management plans **as he sees fit** and such plans, as approved by the Minister, shall be published and implemented by I.F.I." (Article 7.). The Minister, through this Bye-Law, can expect I.F.I. to do all the planning based on the requested methods of collecting data to inform decision-making, but then, if HE sees fit, he can completely ignore or override the presented I.F.I. plan, amend it and publish HIS plan, and expect I.F.I. to implement something that those officers will know does not fulfil the objectives in the best possible way. The Minister (or civil servant) is pitching his inexperience in this environmental issue as better than the very well-informed, professional experience of I.F.I. officers.

This proposed Bye-Law is either ill-considered or supports the "designated salmonid waters" as also designated coarse fish and pike waters. Such valuable and unique waters should be designated as **exclusively salmonid waters** and 5 year plans should work towards achieving this.

Please reconsider implementing this disastrous Bye-Law and act to protect our special salmonid waters.

Yours sincerely,

Ray Broughton  
Chairman

On 10 Aug 2021, at 11:31, IFD Public Consultations <[IFDPublicConsultations@decc.gov.ie](mailto:IFDPublicConsultations@decc.gov.ie)> wrote:

Good Morning Raymond,

I refer to your submission attached and wish to inform you that I am unable to view same.

Can you resend it please, in a different format than the original one or copy the text into a reply to me so I can register the submission made by your Association.

Many thanks. I look forward to hearing from you in due course.

Regards,

Bill Goggins  
Inland Fisheries Division.  
Cavan.

-----Original Message-----

From: Raymond Broughton [<mailto:carralife@gmail.com>]  
Sent: 07 August 2021 15:11  
To: IFD Public Consultations  
Subject: Consultation Response

**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.

Please find my response, on behalf of Ballinrobe and District Trout Anglers Association, to the Consultation of Designated Salmonid Waters Bye-Law No. XXX, 2021.

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