

Bill Goggins

From: Braithreacht na Coribe <braithreachtnacoiribe@gmail.com>
Sent: 20 August 2021 14:16
To: IFD Public Consultations
Subject: Proposed designated Salmonid Waters Bye-law.

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Dear Minister,

I wish to convey the serious concern of our club and its members to your proposed Salmonid Bye Law. Braithreacht Na Coiribe is the oldest and longest established club on the Lower Corrib system with a vast membership from around Galway and beyond. We had campaigned for the full designation of the Salmonid waters and are very disappointed that the draft legislation recently published does not go far enough in the protection that had been sought.

In particular, the clear issues to us in the proposed bye law that cause us most concern are the following points:

- 1) The vague interpretation of the wording, "designated waters shall be managed primarily for the benefit of wild Salmonid species"...Minister, this is causing serious unease and leads us to believe that it's vague interpretation does not offer the full protection that is required. The word Primarily should be removed and replaced by the word solely or exclusively.
- 2) The next part of the proposed bye law, Pt. 7, is where the Minister of the day, before approval, may amend stock management plans as he sees fit. This is not helpful and stock management plans should be left to the operational decisions of IFI personnel who base their decisions on good scientific advice.
- 3) Section 2 of the proposed bye law should be changed to include all the rivers and streams that fed these great Salmonid waters. The Clare river system is one of the major spawning tributaries on the Corrib catchment system just outside Galway city. It is a resting place and a huge spawning habitat for migrating Annie II Salmonid species. This river is also an SAC and the Native Annex II species are protected under the Habitats directive.

Minster, please take on board these genuine concerns. Now is the time to make these important changes and not down the road after needless legal challenges and much negative public comment.

Thanking you,

Noel O' Toole
Chairman, Braithreacht Na Coiribe.