Bill Goggins

From:

dan o'donovan <kilbeg@outlook.com>

Sent:

03 August 2021 14:22

To:

IFD Public Consultations

Cc:

Brian Regan; Philip Comber; Stephen Lydon; Mark Ryan

Subject:

Designated Salmonid Waters Bye-Law

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From:

Cong & District Anglers Association c/o Lydon's Lodge Cong Co Mayo

Re: Draft Designated Salmonid Waters Bye-law

Dear Sirs.

As secretary of the Cong and District Anglers Association I have been asked to make a submission on behalf of our club in regard to the proposed bye-law. While we very much support the designation of the waters listed as Salmonid Waters there are a number of items in the draft bye-law which we feel need to be changed:

Point No. 4: We wish to see the word "primarily" removed as it's inclusion is unnecessary and creates ambiguity. The designation is very clear cut with its removal and not open to alternative interpretation. We would also wish to see "Primarily" removed from the explanatory note to the bye-law.

Point No. 7: We wish to see this point removed entirely. As IFI are the body charged with management of the loughs and have the experience and scientific expertise available to make appropriate decisions on stock management control we believe they should not be open to interference from the Minister of the day to "amend stock management plans as he sees fit".

Schedule 1: The list of designated waters in column (2) should in our view be extended to specify the inclusion of each lough's tributaries and catchment area. The tributaries and catchment area of a lough are a key element of its existence and their inclusion in the Salmonid Designation is essential if the designation is to be effective.

Thank you for the opportunity to make this submission.

Dan O'Donovan - Secretary