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To: IFD Public Consultations

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Dear Minister Ryan

I am writing on behalf of the Cregmore Athenry Anglers's association and it's members in relation to the recent publication of the Draft Designated Salmonid Waters Bye Law.

The Lakes mentioned in schedule 1 of the proposed Bye Law are all unique and are extremely important habitats for wild trout, salmon, and sea trout.

It is essential that these lakes are managed exclusively as salmonid fisheries.

The current programme for government committed to designating these identified lakes in order to preserve and protect these important fisheries.

We are extremely concerned that the proposed draft Bye Law will not provide the protection and basis for management that is required to safeguard these unique and valuable salmonid habitats.

Section 4 of the draft Bye Law is ambiguous on this point.

We are concerned that the Minister under section 7 of the draft Bye Law will be empowered to amend stock management plans, before publication, against the advice of Inland Fisheries Ireland the statutory body set up to manage fisheries in the state.

This is very wrong, that a minister could interfere so blatantly in the proper management of fisheries.

In effect this would mean that Inland Fisheries Ireland would not have the ability to manage without the prospect of interference from a minister who may be subjected to political pressure. If this draft Bye Law is implemented inland fisheries would be managed on the basis of political decisions rather than sound evidence based criteria.

In order for the draft Bye Law to achieve the objective of protecting our unique salmonid habitats there can be no ambiguity in relation to management.

This will require that in section 4 of the draft Bye Law the word “**primarily**” is removed. We would also require that the Minster removes in total section 7 from the bye law.

Yours sincerely,
Phil Donoghue, Secretary.