

Bill Goggins

From: fissta2017@gmail.com
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To: IFD Public Consultations
Subject: Submission on Designated Salmonid Bye-Law 2021 consultation
Attachments: FISSTA Submission to Minister on Designated Salmonid Waters Bye-Law 2021 consultation 19.8.21.pdf

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Federation of Irish Salmon & Sea Trout Anglers

Conaidhm na Slat Iascairí Bradáin & Breac Geal

F.I.S.S.T.A.

Chairman: Mr. PAUL LAWTON, 37 Connoly Gardens, Ballyphehane, CORK City. Secretary: NOEL CARR, Teelin Rd, Carrick, Co. Donegal. Tel: 074 9730300. Email: fissta2017@gmail.com

SUBMISSION TO MINISTER EAMON RYAN ON THE PROPOSED DESIGNATED SALMONID WATERS BYE-LAW 2021

Submitted from the FISSTA Secretariat in Donegal 19th August 2021 to: *Inland Fisheries Division, Department of the Environment, Climate and Communications, Elm House, Earlsvale Road, Cavan Town. H12 A8H7 and Minister Eamonn Ryan, Dept ECC, 29-31 Adelaide Road, Dublin 2, D02 X285.*

FISSTA, the Federation of Irish Salmon and Sea Trout Anglers are Ireland's all island salmon and seatrout angling body representing the majority of the 20,000 club anglers and the sport on the many salmon and seatrout rivers that pay millions in rod license revenue to finance the state fisheries authorities on both north and south of the border.

FISSTA welcomes the Government's genuine intention to introduce greater protection in designating Salmonid waters in the proposed draft Bye Law, but the wording as drafted, will not provide this intended protection and management responsibility that is required to safeguard these unique and important habitats. The EU Habitats Directive has long protected the integrity of our SAC's and our salmonid species, but this draft bye law wording will now be undermined.

To rectify this, we propose:

1. This proposed draft Bye Law will not achieve the objective of protecting our unique salmonid habitat as it proposes to transfer the management responsibility from Inland Fisheries Ireland to the Minister unless the entire Section 7 is deleted.
2. We would also require that the Minister removes the word "primarily" from Section 4 to read as follows:
"The designated waters shall be managed for the benefit of wild salmonid species."

We look forward to continuing to work with the Minister and his staff, and IFI to improve and enhance our wild salmonid habitat.

Yours sincerely,

Noel Carr. Runai. FISSTA