

Bill Goggins

From: Denis Healy <denishealy@inbox.com>
Sent: 20 August 2021 15:38
To: IFD Public Consultations
Subject: Consultation on proposed salmonid waters bye-law
Attachments: Galway and Corrib Submission.docx

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Dear IFI and Dept. of the Environment,

The Galway and Corrib Anglers' Association club fishes from Birchall Bay on the West of Lough Corrib.

We welcome the proposal to enact a bye-law that recognizes Lough Corrib, and other lakes, as trout and salmon waters. There are aspects of the draft released for consultation that we would like to see changed so that the bye-law can more fully meet the ambition of protecting these valuable fisheries.

We believe that it should be placed beyond dispute that the designated lakes are to be managed for the benefit of salmonid species. The word "primarily" in section 4 is unnecessary and unhelpful. An agency charged by the state with the implementation of fisheries policy needs to be supported with clear, unequivocal direction. Remove the word "primarily" and the direction is clear.

A second concern is the statement in section 7 that "the Minister may, before approval, amend stock management plans as he sees fit". We are puzzled by this wording and do not understand the intent here. Our view is that if the agency (IFI) is seen as competent and is operating with clear direction there should be no need for ministerial input - some would say interference - in what is an operational decision. The words quoted above should be removed.

Finally, we would like to see the definition of "designated waters" in section 2 referring to a list of lakes contained in the footnote expanded to read as follows:

' "designated waters" means the waters designated as wild salmonid waters under article 3, their tributaries and catchment'.

Yours sincerely,

Denis Healy, Assistant Secretary, Galway and Corrib Anglers' Association