

Bill Goggins

From: Billy Smyth <billysmyth0@gmail.com>
Sent: 16 August 2021 23:11
To: IFD Public Consultations
Subject: Designated Salmonid Waters Bye-Law

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Inland Fisheries Division,
Department of the Environment, Climate and
Communications.

Submission on behalf of

Galway City Salmon Angling Association.

To whom it concerns,

Galway City Salmon Angling Association (GCSAA) objects strongly to the word " primarily " being used in section 4 of the draft Designated Waters Bye-Law to describe how salmonid lakes are to be designated. This one word will legally allow, in the future, all salmonid lakes to be run as mixed stock fisheries, which will give protection to invasive species such as Pike, Perch, Roach, etc. We ask that the word "primarily" be removed and replaced with the word "totally" or "exclusively" for the benefit of wild salmonid species.

We are also opposed to section 7 of the Draft Bye-Law which would allow the minister to have a veto over the advice of the IFI experts who will be drawing up and implementing the stock management plan.

There is no point in bringing in a Bye-Law to protect wild salmonid species in our lakes if they are not protected on their migration journeys to and from the sea. Wild salmon and sea trout have to run the gauntlet of disease carrying sea lice infestations from salmon farms all along our west coast. Farmed salmon are escaping from Irish salmon farms nearly every year and interbreeding with the wild salmon stock, which according to marine scientists will have a detrimental effect on the wild stocks. How can one Government agency protect our wild salmon and sea trout if a number of other Government agencies are promoting the expansion of salmon farms all along our west coast?

How can our wild salmonids be protected if Draft netting and poacher netting is allowed to continue on most of our rivers?

How can our wild salmonids be protected if predators such as seals, cormorants, pike, etc. are allowed to devour them at an alarming rate every day, 365 days of the year?

How can our wild salmonids be protected if man made barriers are preventing them getting to their spawning grounds?

How can our wild salmonids be protected if our rivers are being polluted on a regular basis and no proper sanctions imposed on the culprits?

While a Bye-Law that would designate our great Western Lakes as salmonid protection lakes is a welcome first step, we believe if the above issues are not addressed soon, then the Bye-Law will be a waste of time.

Please acknowledge this email submission as soon as possible.

Yours sincerely

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