Bill Goggins

From:

Sent: To: Subject: 20 August 2021 10:40 IFD Public Consultations

Salmonid By-Law

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Dear Sir.

The waters covered by the bye-law are Carra, Mask, Corrib, Conn, Cullin, Sheelin and Arrow.

The purpose of the bye-law is to enable IFI to manage the fishery for the benefit of salmonids, that is trout and salmon. It will enable them to manage the fisheries and to manage other species such as pike and coarse fish for the benefit of trout and salmon. So far so good.

However the wording of the bye-law gives us concern in three parts.

- 1. Point 4 of the draft document says: "The designated waters shall be managed primarily for the benefit of wild salmonid species". The word "primarily" should be removed. It adds nothing useful, is confusing and open to broad interpretation. The same word appears in the Explanatory Note at the end of the document and also should be removed from there.
- 2. Point 7 of the draft document says that "the Minister may, before approval, amend stock management plans as he sees fit", our view is that IFI has the expertise to devise and implement management plans and should be allowed freedom to do so once enabled by an appropriate bye-law. We want to see this section removed.
- 3. Section 2 of the draft document reads:
- "designated waters" means the waters designated as wild salmonid waters under Article 3". This isn't good enough as it omits the tributary streams and the wider catchment. If these aren't managed the lake cannot be managed. Words should be added so this section reads:
- "designated waters" means the waters designated as wild salmonid waters under Article 3, their tributaries and eatchment".