

From: [REDACTED]
Sent: 20 August 2021 12:25
To: IFD Public Consultations
Subject: Draft Designated Salmonid Waters Bye-Law 2021

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern,

I wish to make the following observations in relation to the Draft Designated Salmonid Waters Bye-Law 2021.

I have concerns that the current wording of the proposed bye-law will in effect downgrade the Corrib Catchment Special Area of Conservation as it relates to the protection of Salmonids.

Section 4 states that "The designated waters shall be managed primarily for the benefit of wild salmonid species."

The word "primarily" is unnecessarily ambiguous and leaves room for non-salmonid species including non-native and/or invasive species to be afforded protection. I would suggest that this word be removed altogether or replaced with the word "solely". Section 7 states "The Minister may, before approval, amend stock management plans as he sees fit and such plans, as approved by the Minister, shall be published and implemented by IFI." Why would such powers be conferred on the Minister when IFI are the statutory body empowered to design and implement stock management plans. This allows for political inference either on the part of the Minister or appropriate Department when they may not have the relevant qualifications or experience to make such decisions. Oversight is clearly important but the wording which provides for amendments "as he sees fit" is extremely broad and doesn't provide any assurance that any amendments would be based on best scientific advice.

[REDACTED]