

From: 
Sent: 20 August 2021 12:31
To: IFD Public Consultations
Subject: Designated Salmonid Waters Bye-Law

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Sirs

I wish to comment on the Draft Designated Salmonid Waters Bye-Law as follows:

The continued application of Coarse Fish bye-law (806) and the Conservation of Pike bye-law (809) on waters where our last remaining stocks of salmonids exist in Ireland, makes a complete nonsense of the draft designated salmonid waters bye-law. Clearly these non-native, invasive species are impacting adversely on our native stocks, yet they are protected on all Irish waters by the above laws.

Recent press releases from IFI confirm that pike are continuously being unlawfully spread throughout the waters of the state (<https://www.fisheriesireland.ie/Press-releases/pike-have-been-confirmed-in-aughrusbeg-lough-co-galway-media-release.html>). IFI further stated that this "could be devastating to resident fish populations". The Oughterard lakes, have also been decimated by a similar unlawful release of pike. These releases were, most likely perpetrated by unethical anglers who wish to pursue their preferred coarse fish species on new waters and Bye-law 809 continues to reward these perpetrators by offering protection to the introduced invasive species.

The failure of the draft Designated Salmonid Waters Bye-Law to deal with this anomaly renders it completely meaningless as a conservation measure for salmonids on the western lakes, where introduced invasive fish species enjoy a greater level of protection than the native ones. The presence of non-native, invasive fish species has resulted in many of our waters failing to reach "high or good" ecological status under the provisions of the Water Framework Directive <http://wfdfish.ie/index.php/wfd-and-fish/>. Recent Article 17 reports to the European Commission also indicate that we are failing to meet agreed conservation objectives for many species (including Atlantic Salmon) and habitats under the provisions of the Habitats Directive.

https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol3_Species_Article17.pdf L06 & 102 (pp393 – 395) indicate that measures are required to reduce pressures on salmon populations arising from interaction with and predation by "other invasive species" - (other than species of Union concern – i.e. Coarse fish species that are endemic to mainland Europe but not to Ireland.)

The continued protection of invasive fish species on salmonid waters increases the risk of spread. Target 4.4. (under Objective 4) of Irelands National Biodiversity Action Plan (2017 – 2021) states that, "Harmful invasive alien species are controlled and there is reduced risk of introduction and/or spread of new species". Consequently, the failure of this bye-law to address the implementation of bye-laws 806 & 809 on salmonid waters and the protection of invasive fish species runs contrary to the objectives of the NBAP.

(<https://www.npws.ie/sites/default/files/publications/pdf/National%20Biodiversity%20Action%20Plan%20English.pdf>)

In failing to address the impact that invasive fish species are having on our salmonid waters, the draft bye-law shows a disregard to the relevant European Directives and wildlife conservation generally. The bye-law must be re-drafted to include all waters where salmonids stocks are still in a sustainable condition and abolish bye-laws 806 & 809 on these waters.

