

**Bill Goggins**

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**From:** [REDACTED]  
**Sent:** 20 August 2021 13:51  
**To:** IFD Public Consultations  
**Subject:** Submission on draft Designated Salmonid Waters Bye-Law

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To whom it concerns

I am opposed to the bye-law in its current form for the following reasons.

Firstly, I am gravely concerned by section 4. There is one word which undoes any potential benefit in the section. The word is "primarily" and refers to the management of our unique salmonid habitats. It should be replaced by the word "solely" in order to afford the appropriate protection to said unique salmonid habitats. By using the word "primarily", the salmonid habitats would no longer be unique, they would become mixed fisheries, thus throwing away wild salmonid waters that are the envy of anglers and countries the world over.

Secondly, I am alarmed that the minister, under section 7 will be able to amend stock management plans even if his/her amendments were to go against the expert and considered advice of Inland Fisheries. This is quite simply dangerous. Our wild salmonid lakes and rivers are too precious a resource to be left at the mercy of any one individual who may have one particular viewpoint. In political terms, this is akin to setting up a dictatorship.

This also allows the minister to ignore the Habitats Directive, putting our SACs (Special Areas of Conservation) in jeopardy. As a result, the Irish government would be in clear breach of said Habitats Directive and would be sacrificing our SACs. It also neuters the statutory body, IFI, who are charged with stock management, handing over this huge responsibility for this resource to a government department.

The Habitats Directive, and the welfare and survival of our SACs (Special Areas of Conservation) should be the first consideration of the department of the environment in matters relating to our unique salmonid waters. From what I have seen in this draft bye-law, this is not the case.

Yours Sincerely

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