

From: [REDACTED]
Sent: 10 August 2021 09:18
To: IFD Public Consultations
Subject: Proposed designation of salmonid waters

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Hi

1. I would strongly support the making of this bye-law and I congratulate Minister Ryan and his Department in bringing it forward as I consider it essential for the effective management of Ireland's premier trout and salmon fisheries. Unfortunately, foreign species such as pike have been introduced to these fisheries over the past few hundred years and have caused severe damage to trout and salmon stocks. There is now a huge body of scientific data that proves beyond doubt that pike prey heavily on both trout and juvenile salmon and, to lesser extent, on returning grilse. It is absolutely essential, therefore, that pike stocks are strictly controlled if the great western and midland lakes are to continue to support healthy stocks of trout and salmon.
2. Predation by pike takes place in tributary rivers and streams as well as in the lakes themselves and, for this reason, Schedule 1 should be broadened to include the inflowing and outflowing rivers and streams of the lakes covered by the bye-law. For example, in the River Moy catchment, the most important tributary for both salmon and trout spawning and nursery water is the River Deel which flows into Lough Conn. However, the lower part of this river holds significant stocks of pike through which salmon and trout must migrate on their way to Lough Conn and, in the case of salmon smolts, to the sea. It is well known that pike prey heavily on both species as they migrate downstream. In the case of salmon smolts, they have to run the further gauntlet of migrating through Lough Cullin which is rightly included in the proposed bye-law. In the Lough Arrow catchment, the main spawning and nursery water is the outflowing Unshin River parts of which also holds pike. For this reason, I would strongly urge that outflowing, as well as inflowing, rivers and streams are included in Schedule 1.
3. I strongly believe that, apart from broad policy considerations, management of inland fisheries should be left to Inland Fisheries Ireland. IFI has the necessary scientific expertise and experience to carry out its statutory remit and it is difficult to see the reason for the inclusion of section 7 of the proposed bye-law. Having to submit annual plans for approval and possible amendment by the Minister is unnecessary and will simply result in an increased workload for both IFI and the Department. I would suggest that this section be removed.
4. In conclusion, this important bye-law is very welcome and will be of great assistance to IFI in management of some of our most important game fisheries which are a highly valuable natural resource which deserve maximum protection. However, I would ask that serious consideration be given to the above suggested amendments.

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10 August, 2021