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From: [REDACTED]
Sent: 15 August 2021 16:55
To: IFD Public Consultations
Subject: Designated Salmonid Waters Bye-Law (draft)

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This is an entirely meaningless piece of legislation in its current form as it fails to provide any additional protection for salmonid fish in their designated waters. It does, however, continue to offer enhanced protection to the various invasive non-native fish species which have been unlawfully introduced to the designated waters. These species impact adversely on the native stocks of salmon and trout but it remains an offence to take them from the said waters. The failure to exempt the designated waters and the numerous other salmonid lakes and rivers along the western seaboard, from the influence of bye laws 806 & 809 makes a mockery of the current draft.

Pike and other coarse fish are now appearing in numerous lakes and rivers in the west of Ireland. Lough Inagh was, until recently, one of the last strongholds in Galway for Arctic Char. The criminally reckless introduction of perch to this system has brought this rare native species to the verge of extinction in the County, yet it is an offence to remove the perch while still entirely lawful to kill the last remaining char on that lake.

Why is the current minister so keen to maintain the coarse fish bye laws in waters where these species are killing or native stocks? The current draft of the designated salmonid waters bye-law is woefully inadequate, biased in favour of invasive, non native fish species and contrary to the objectives of Council Directive 92/43/EEC and Council Directive 2000/60/EC. The best thing about this bye law is that it seems to provide ample grounds for appeal. How can a minister coming from the Green Party be so ignorant in relation to our most pristine and treasured habitats? The introduction of this bye-law in its proposed form allows superior protection for introduced coarse fish than the native species he is claiming to conserve. This bye-law needs to abolish 806 and 809 on salmonid waters if it is to have any conservation value.

Pike are being illegally spread to our most pristine salmonid waters, e.g. Oughterard lakes and now Aughrisbeg. This bye law rewards the perpetrators of these criminal acts by continuing to offer better protection to the introduced invasive fish than the native species it is supposed to be conserving.

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