

Bill Goggins

From: [REDACTED]
Sent: 20 August 2021 10:30
To: IFD Public Consultations
Subject: Draft byelaw designating Salmonid waters

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I am writing to you to express my support for the proposal to formally designate a number of lakes as Salmonid waters but I wish to bring up a number of issues regarding the draft bye law.

1. The use of the word primarily regarding the management of the fisheries in section 4 is concerning as it allows for ambiguity in what should be a very simple message, that the lakes are to be managed as Salmonid fisheries.
2. The section which states that the relevant minister can amend stock management proposals as they see fit is a ludicrous suggestion. If the competent authority proposed a stock management strategy based on scientific information then what reason would the minister have for changing this. It only allows for political lobbying of the minister. This in my view is a dangerous scenario.
3. Rather than designating lakes it should extend to the catchments of these lakes to allow proper management of the system. It would help with land management issues in the upper catchments of these lakes.

I have been involved in the protection and enhancement of wild brown trout for over 20 years and the States involvement during that time has been adhoc and reactionary for the most part. Proper management is needed to protect this part of our natural heritage and unless it happens soon we will lose all these fisheries. we have already gone from a position 20 years ago when we spoke of 13 wild brown trout fisheries in Ireland to a situation where we are now looking at only 8.

The time for action is decisive decision are now.

Regards Philip Comber

Sent from my Huawei phone