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August 18th, 2021

Inland Fisheries Division,
Department of the Environment, Climate and Communications,
Elm House,
Earlsvale Road,
Cavan Town.

Dear Sir or Madam,

I write to you in relation to the recently publicised "Consultation on Draft Designated Salmonid Waters Bye-Law" that was highlighted on the IFI website recently. I am of the opinion that the intended measures are archaic, cruel and go against science.

I understand that IFI have a difficult job to do in striking a balance between certain groups' demands and other anglers' wishes, however I feel that by implementing the intended designations which sees a continuation of gill-netting they are bowing to the demands of the group that can make the most noise in this argument. In many respects IFI are also going against their own funded research which has banished the old idea which saw pike as "the old foe" (Viney, 2018).

While the groups that operate as custodians of the salmonid stocks on the western lakes often infer that there is wholesale agreement amongst the angling community in favour of pike control measures, ESRI research enlightens us that the reality of the situation is quite different: "among trout anglers there is a sizeable majority opposed to the maintenance of

existing pike stock control measures, which is at odds with a vociferous public campaign led by trout angling representative organisations.” (Curtis, 2018)

This group’s noisy campaign may make it seem that pike control is a “no-brainer” on these waters, the truth is a different story though and there are many recreational anglers out there who are wholly opposed to the continued practice of gill-netting.

In times past, traditionally held beliefs with regards pike preying exclusively on trout along with the notion that pike were not native to this land helped give weight to the argument favouring pike removal. However recent studies have explored both of these avenues and found that these claims proved false. In a 2018 study (Pedreschi et al. 2018) evidence was found confirming: “the existence of distinct populations... which indicates that pike may have first colonized Ireland naturally.” Hard evidence of the presence of pike in Ireland go back as far as the 14th century. If the mixed-fisheries now designated as Salmonid Waters have survived since that period without the need for human intervention, I find it hard to see how the continuous removal of pike from the said waters is in any way justifiable.

The cohort of anglers pushing for continual pike removal condemn pike for their predation on wild brown trout stocks in the western lakes. The most up to date research (Fitzgerald et al. 2019) conducted in lakes such as Loughs Conn and Sheelin showed that while pike do prey on trout, they do so in small numbers. The study went on to reveal that they rely predominantly on roach and perch to fuel their diet. The closing lines of the above report is quite forthright in its conclusions with respects to the management of the designated salmonid waters: “statistical models suggested that relatively large deep lakes with strong stream connectivity offer a greater probability of coexistence for pike and trout in Ireland.” (Fitzgerald et al. 2019)

The continuous implementation of anti-pike laws costs a lot of money to the Irish taxpayer. The removal of pike from the western lakes sees a valuable chunk of tourism potential in the shape of overseas pike-anglers quashed. The research studies tend to conclude that salmonid fisheries in the west of Ireland are able to sustain both pike and trout stocks in a mixed setting. The fact that this outdated practice is continually allowed to be implemented when it is costing us so much both economically and ecologically should be a matter of utmost concern for government ministers in the region.

I write this piece as one of the silent minority that fish recreationally on the local lakes. While my view may not carry us much weight as that of the elite trout anglers I hope that my voice as well as that of the many other parties who enjoy both pike and trout angling on the lake is listened to in a fair and equitable manner.

Is mise le meas,

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References:

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- Fitzgerald, C. J., Sheehan, S., McLoone, P., Kelly, J. J., & Farnsworth, K. D. (2019). Evaluating management options for fish fisheries that conflict through predator-prey interactions on target species. *Ecological Modelling*, 416, 108740.
- Pedreschi, D., Kelly, Quinn, M., Caffrey, J., O'Grady, M., & Mariani, S. (2014). Genetic structure of pike (*Esox lucius*) reveals a complex and previously unrecognized colonization history of Ireland. *Journal of Biogeography*, 41(3), 548-560.
- Viney, M. (2018, September 15). *Pike no longer deemed to be the unacceptable foe*. The Irish Times, <https://www.irishtimes.com/news/environment/pike-no-longer-deemed-to-be-the-unacceptable-foe-1.3624412>.