

## Bill Goggins

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**From:** [REDACTED]  
**Sent:** 19 August 2021 00:51  
**To:** IFD Public Consultations  
**Subject:** Public Consultation: Draft Designated Salmonid Waters Bye-Law

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To Whom it may concern .

please accept my submission to the Public Consultation: Draft Designated Salmonid Waters Bye-Law

Sincerely

Fergal Scully

1. All native Irish salmonids should be included in this law such as Char and Whitefish as these fish are valuable native species and are overall indicators of decreasing water quality. The fact they are not popular angling species should not preclude them from inclusion and protection.
2. Fishery management should not include the attempted removal of any fish species deemed to be native to Ireland in latest peer reviewed research.
3. Fishery management should not include removal of coarse fish already established in the loughs, because
  - a. this practice has not been shown to increase salmonid numbers
  - b. it has actually been shown to increase the numbers of coarse fish themselves as it upsets the natural prey –predator balance. We are now witnessing a perch explosion on some of these lakes due to the practice of removing their main predator. Species such as perch, roach and bream actually eat their own eggs and fry too but cannot if removed post spawning etc. resulting in fry explosions and survival in subsequent seasons.
  - c. the money is better spent on habitat restoration and protection especially in spawning streams and monitoring water quality and prosecuting polluters.
  - d. the native pike allow for an off season income for the tourist industry in the area if the pike netting were ended.
4. Catch and release needs to be included as a fishery management technique. Salmonid fisheries , particularly trout fisheries worldwide practice catch and release and the numbers

and quality of the trout improve massively. Catch and release on Lough Sheelin, as encouraged by the local club, has shown to be at least a significant part of the current high quality fishing to be had there in last few years. This bylaw should seek to introduce mandatory catch and release on these waters.

5. If mandatory catch and release can not be introduced then bag limits should be drastically reduced. Perhaps no more than one trout. Competitions that rely on killing trout should be banned. They have no place in modern fisheries management. Catch , measure , photo and release competitions can easily replace these. Then also catch and release should be encouraged with large permanent colour posters at all main boat launch points.

#### **Lee Wulff Quotes**

- "The finest gift you can give to any fisherman is to put a good fish back, and who knows if the fish that you caught isn't someone else's gift to you?" ...
- "Game fish are too valuable to be caught only once." ...

6. There should be published water quality guidelines and limits on pollution from industry and farm land in the catchments of these lakes.

7. There should be much stiffer penalties breaking these pollution laws .

8. There should be stiff penalties for physically interfering with the spawning streams of salmonids especially removal of gravels or altering water courses in any way.