

## Bill Goggins

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**From:** [REDACTED]  
**Sent:** Wednesday 10 November 2021 17:55  
**To:** IFD Public Consultations  
**Subject:** Comment on Salmon Regulations 2021 etc

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I refer specifically to the proposed regulations regarding Owenea/Owentocker (Letterkenny District) for 2022. In its recent statistical report recording catches for the 2020 season, Inland Fisheries Ireland clearly defines the Owenea and Owentocker as two distinct and separate rivers - draining, as they do, two totally separate catchment areas. It is an accident of geography that these rivers drain into the same bay. Given IFI's clear separation of the rivers, I wish to object to the fact that the proposed regulations classify them as a single river and therefore ascribe a total allowable to a single (non-existent) river called the Owenea/Owentocker.

Given that IFI's own statistics show a near zero catch of salmon from the Owentocker, it is reasonable to assume that in any other circumstances the Owentocker should be closed to angling on a precautionary conservation basis. If this was the case, there would be no justification for allowing the commercial exploitation of the stock by draft nets in the river estuary.

The Department is guilty of a gross deception perpetrated only for one reason and that is to put forward a false construct in order to enable commercial fishing to continue. I am well aware that there is political pressure on Ministers/Departments from netting interests, and always has been, but the continued netting of a mixed-stock estuary when stocks are in continual decline makes a mockery of your claims of salmon "conservation".

Yours sincerely  
[REDACTED]