

1

Bill Goggins

From: [REDACTED]
Sent: Thursday 9 December 2021 16:57
To: IFD Public Consultations
Subject: FW: submission 1 to decc

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.



- *Federation of Irish Salmon*
- *& Sea Trout Anglers*
- *Comaidhm na Sláí Iascaíirí Bradain agus Breat Gearraí*

F.I.S.S.T.A.

- FISSTA Secretary & PRO: [REDACTED] email: [REDACTED]

Dear Minister

We are once again making a submission within the 30 day consultation period only for it to be ignored. We have lost confidence in this process of consultation with the Dept as no responses to our concerns are ever acted upon so nothing changes.

The process the DECC adopted for the establishment of ACCI at this time last year was a disgrace and more importantly continues to be a serious development that must be confronted to eventually result in independent and intensive scrutiny and review.

We have decided to pursue a new course of action through a newly established and fair minded NIFF to influence and change the rapid decline in conservation which the angling communities can buy into and partake in a partnership that will impact for change. We will submit our spreadsheet of issues river by river to NIFF with a request to get SSC / IFI/ and other inter agency state contributors to approve a river by river plan as proposed by the new IFI CEO.

So, we propose to use this consultation to protest and reject the outdated and useless Dept process which no longer serves the salmon and seatrout.

We ask you Minister to reciprocate and respond to our appeal for urgent change.

Yours sincerely,

[REDACTED]

FISSTA – FEDERATION OF IRISH SALMON & SEATROUT ANGLERS

Federation of Irish Salmon & Sea Trout Anglers

Conaidhm na Slat Insaicirí Bradúin agus Breac Geal



FISSTA – FEDERATION OF IRISH SALMON & SEATROUT ANGLERS

FAO: Minister Eamon Ryan TD, Inland Fisheries Division, DECC, Elm House, Earlsvale Road, Cavan Town H12 A8H7, Ireland.

9th December 2021.

RE: Wild Salmon & Sea Trout Tagging Scheme Regulations 2021 and Conservation Measures For The 2022 Season

In response to the above Minister of DECC, publishing statutory notice of his intention to make the Wild Salmon and Sea Trout Tagging Scheme Regulations, 2021, we acknowledge the Minister's intention to provide for the management of the wild salmon and sea trout fishery by Inland Fisheries Ireland from 1st January 2022.

Our Federation, as in past years, have consulted our members on most of our salmonid rivers and agree that instead of submitting numerous comments and proposals which never receive the consideration or response we deserve, we now send one observational submission in the form of an appeal for reconsideration of the many new rivers of 2022 that have been reclassified for the following reasons below.

Since our last submission twelve months ago, the following issues have contributed to the decline in our rivers and spawning which we seek your immediate intervention as six months more may be too late:

- 1. Open all our rivers now for protection against a poaching scourge that has increased annually. The failure of the previous CEO of IFI to conduct the promised review your predecessor ordered in January 2018 has hindered the decision making process that would have assisted our rivers to be properly reclassified.*
- 2. The announcement since May 2017 that Norway had agreed a ban on any new applications of sealice generating salmon farms with a roadmap plan endorsed by Norske Industri and Marine Harvest. Ireland must follow to protect our salmon.*
- 3. The continued uncertainty in who or what organisation will support NASF to pay the buy out costs of these international agreements - If our fish are not protected in their feeding grounds of the North Atlantic then, we all will lose the returning salmon to our natal rivers to spawn. The improved runs in 2020 and 2021 is proof positive that we must not ignore this most effective conservation initiative which our economy and your government benefits greatly from its inception. Urgent action by the Irish Government is needed now.*

4. **The lack of any communication by the previous Minister between our affiliated clubs managing our many rivers and IFI and the Standing Scientific Committee is a constant issue that raises anger and shock when the draft regulations close down a river without any consultation whatsoever. Every year we are contacted for advice when no information or reasons are forthcoming directly from those who should be undertaking these duties. Once again, I enclose below a copy of the Ardara Anglers letter to the line Minister which reflects the frustration of our clubs every year at this time. We ask the Minister to put in place a better system of communication and criteria list with scientific data to back up the plan.**

We make this appeal within the 30 days period concluding on 9th December, 2021 and post this to Inland Fisheries Division, Department of Communications Energy and Natural Resources, Elm House, Earlsvale Road, Cavan Town H12 A8H7, Ireland and also we will send by e-mail. We would request that our submissions once received will be acknowledged by publishing it on the Department's website following the conclusion of the consultation period. We seek your intervention for rivers that are closed for over 15 years as surely they must have a hope of survival too. We welcome the tagging review and look forward to playing our part through NIFF to reform the process and agree that the Fishery District Committee process should have stronger powers to change the system as the advisory capacity, never did and does not now cut it anymore. Progress and change has long been overdue so we look forward to the 2022 draft regulations delivering a meaningful consultation that matters this time next year. Doing nothing is no longer an option.

We appeal to you Minister Ryan TD in your second year of accepting our submissions to revisit the Conservation Limit figures and seek more updated data which we are hopeful will lead to a reclassification of the many rivers to a brown tag fishery for 2022. We consider the 2015 – 20120 salmon catch advice in separate letters and can confirm the five year average needs re-examination in view of the data we have collected in recent years. The previous Minister accepted our argument on this issue and promised us a review of these issues that closed our rivers and small angling tourism economies that are valued as part of the €750m that angling brings to Ireland every year.

We are working with our affiliated clubs to halt the decline in whatever way we can in light of the heavy odds against us and we acknowledge the Salmon Conservation Fund has helped greatly in many circumstances. We have already cited the Glen River in Ballyshannon region as one good example where the measures were taken over the past five years to halt that decline and mitigate the impact of an industrial fish factory on the river environment. This club has succeeded where many have failed to convince and cooperate with the industries on their river and as a result have succeeded in reclaiming waters for spawning enhancement that will deliver increased returns and in return the club assisted in their successful application to Origin Green which they were awarded in 2014. The enhanced spawning programme is vital to mitigate against the large loss of migrating smolt stock (much more than 39% as IFI estimate) travelling through Donegal Bay. But it seems that it is a case of too little, too late and we are lobbying very hard to get greater support from you and your colleagues in government to grant more investment into the scheme. The now defunct NSAD €2.2m. funding never reflected the new value of €950m which angling brings to the economy

We are a national federation of over ninety salmon and seatrout clubs on the island of Ireland and our aims and objectives include the conservation of our wild salmon and seatrout as every season we manage the habitat to ensure salmon returns are improved. We are an accredited NGO at NASCO – North Atlantic Salmon Conservation Organisation (www.nasco.int) and put forward both local and international reasons why we have objected to every application for fish farming including the newly awarded VIA ALAB to MOWI in regard to Bantry Bay Shot Head license and we commend your decision and IFI to support us and others in the judicial review process.

We have objected to every one of the fin fish licenses applied for and granted in every bay including Bantry to Lougagh Swilly and Donegal Bay since the early nineties and as always the scientific advice of the Marine Institute is cited as the reason and the defense in supporting your DAFM Ministerial approval. Never or rarely has the other state scientific advice from the CFB or now the IFI or Inland Fisheries Ireland or international authorities been accepted despite many the submissions from us and others drawing the sitting

government's attention to them. The important issue is that every party gets a fair hearing and that justice must be seen to be done by arriving at decisions that are evidence based. But such scientific advice from the Marine Institute is not independent as they are not a free agent without a vested interest in the decision and the general public do not view their advice as such.

We acknowledge the task facing the Standing Scientific Committee in revisiting the calculations of the case we present and we are aware that some members share our concerns and agree that outside expertise in both socio economic impact and scientific impact continues to have in the bay. The application of good fish farm management of sealice during the critical period of February to May for migration is vital but sadly this is not even acknowledged let alone planned to accommodate other users in the bay due to the turmoil of Amoebic Gill Disease which forced MOWI to withdraw some of their activities in the late summer months.

The impact of the cages on rivers running into bays from Bantry to Donegal Bay to Swilly has decimated the fishing and the river economy of tourism in the locality to such an extent that the highly successful Wild Atlantic Way promotion was not of any benefit to most salmonid fisheries as the DAFM policy to wipe out well established angling tourism jobs and replace them with a much diminished number of salmon cages jobs that are employed predominantly to treat pollution and sealice impacts on our marine. More importantly for the DAFM, it has tarnished the image of high quality food produced by the genuine farmer whose concerns are ignored by IFA who continue to reap the financial gain from the toxic salmon producers. At the last ALAB Oral hearing in Bantry, our federation lodged evidence that Norway had agreed a ban on any new applications of sealice generating salmon farms with a roadmap plan endorsed by Norske Industri and MH/MOWI. So, as a Minister charged with the conservation of our wild salmon, we know you can influence DAFM to end this destruction of our wild fish habitat now.

Many rivers are being closed not for scientific reasons but for administrative reasons because the data breaches of mostly visiting anglers who fail to complete their logbooks. There is no reason why local fisheries and the river economy should pay the penalty for a poor system of data collection. Please rectify this very urgent issue in time for the 2023 season by reclassifying all such rivers with a brown tag allocation of 120 fish and let the results of any review be published for the new NIFF to address.

So, in the absence of the IFI review, I would appeal to you, Minister Ryan TD and your colleagues advising you not to delay and to reclassify the many closed or catch and release rivers as brown tag fisheries for 2022 to halt the serious decrease in angling returns and reduction in fishing activity on Irish rivers since driftnetting was banned in 2007.