
From:
Sent: Thursday 8 December 2022 15:43
To: IFD Public Consultations
Subject: Public consultation on the Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2022 and Conservation Measures for the 2023 season
Attachments: Submission from Snap Net Fishermen's Alliance 7 Dec.docx

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Dear Sir/Madam,

Enclosed please find submission from the Snap Net Fishermen's Alliance. Please confirm receipt of this submission.

Best wishes,

Submission to the Department of the Environment, Climate and Communications on the Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2022 and Conservation Measures for the 2023 Season

7 Dec 2022

In the absence of a fish counter on the Barrow, Nore and Suir Rivers, the Angling rod catch is used to calculate the total allowable catch for that particular year. Such reliance on Angling data has limitations e.g. in the year 2018-2022, we experienced three very dry years, including two COVID years, resulting in low Angling returns due to the lack of escapements of fish into the fresh water because of low water levels. By way of example, the water level on the River Suir was so low in the Summer of 2022 that it was possible to light a fire in what should have been the middle of the river at Carrick on Suir, not seen since 1922. (Televised on RTE news).

The Barrow Nore Suir Snap Net Fishermen's Alliance are seeking clarification on what adjustments were made to the rod exploitation rate to take account of the lower fishing activity and very low water levels on the river Suir? . The Snap Net Fishermen undertook a monitoring exercise on the River Suir which concluded that no fish passed Fiddown until the rain/floods in October 2022.

The Barrow Nore Suir Snap Net Fishermen's Alliance continue to request the following measures;

1. install a fish counter on the River Suir to ensure accuracy of the number of salmon that travel up river to spawn over a full calendar year as we have no confidence in the method currently used to calculate the total allowable catch for the following year.
2. To ensure that representation of the ancient and cultural tradition of Snap Net Fishing that has been practiced on the Barrow, Nore and Suir since the Vikings came to South Kilkenny in 740AD be included in the decision making process as to what catch is allowed on the rivers Barrow, Nore and Suir.

This has already been discussed at a meeting in Leinster House with IFI (Inland Fisheries Ireland) on July 12th 2022.

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