

19th September 2022

Francis O'Donnell
Chief Executive Officer
Inland Fisheries Ireland, IFI

Long Term Management Plan for the Great Western Lakes
NCCFFI Response to the Draft For Consultation

Dear Francis,

The National Coarse Fishing Federation of Ireland is the recognised NGB for coarse and predator angling on the island of Ireland. We also represent several game and angling clubs. Affiliated to the world sporting bodies the federation hosts world championships in Ireland which serve to showcase our waters and respect for and protection of our aquatic biodiversity to anglers worldwide.

Whilst the NCCFFI understand the needs of fishery management we object to the unnecessary slaughter of our fish stocks and native wildlife. Already this takes place under the current management of Pike stocks through gill netting and electro fishing on the same waters and will be further enhanced by the removal of statutory protection.

It should be remembered that some of the Western Lakes are also known as top class pike fisheries and are attractive to overseas visitors who provide a source of income to these areas.

We see Western Lakes Plan as a backward step in protecting and conserving our freshwater biodiversity and our members do not support nor welcome the Draft Long Term Management Plan for several reasons:

- It proposes the removal of the Pike Bye-law 809 in certain fisheries.
- It proposes the removal of the Coarse Fish Bye-law 806 in the same fisheries.
- The removal of said byelaws on specific fisheries only would increase the difficulty Inland Fisheries already face with fishery protection and would open the door for misinformed anglers to practise catch & kill on all waters.
- It is untenable that a decision is taken to kill more pike and coarse fish to enhance and protect trout stocks. Particularly so, as trout stocks are healthy and the fishing is good. This is not necessarily the case for anglers fishing on the fly who are slow to adapt to a fast changing environment. Limiting the amount and size of trout killed in competition would have a more beneficial effect. At present it is common practise to apply for an exemption to said byelaws for use in competition where all fish are killed. This practise is then replicated by anglers fishing as an individual.

- There is considerable content regarding genetic studies for Pike and their introduction to Ireland which includes research suggesting their presence as 4,000 ybp. How can IFI now determine that they are non-native?
- There is no proven research that trout are in danger of predation from other species
- It also mentions the term 'newly introduced' which is ambiguous. Who will determine the exact meaning of this term?
- There is reference to the stock management of Bream on Lough Mask where Bream are removed and killed with no regard for movement to another location. This, in our opinion, is not stock management. As anglers we always practise catch & release, and our focus is respect for wildlife and the environment. In this context we propose that this plan must include a section outlining details on rehoming of removed fish in suitable waters 'if' 'such movement is required.
- Management methodologies to include gill netting and electro fishing refer only to the re-homing of coarse fish 'in some instances' and 'where feasible'.
- There is mention that there are no stock management measurements for the control of Roach and Perch but where they are encountered during other removal programmes they may be retained. But it does not clarify what if any plans are proposed for the coarse fish retained.
- How do Inland Fisheries propose to manage waters such as Lough Sheelin where its primary river, the Inny is a mixed fishery?
- It does not focus correctly on the issues facing the fisheries in question with prioritisation on those issues. For example, it is evident that water quality should be the priority #1 in this plan with a focus on stream enhancement works to restore the required environment for spawning.

We believe that this plan would not demonstrate a respect for our freshwater biodiversity and would greatly harm Ireland's image internationally. It would also serve to disimprove Ireland as an attractive and welcoming angling tourism destination.

We have submitted the view of our members, representing coarse, predator and game angling on the island of Ireland to Inland Fisheries Ireland, IFI and the respective Ministers on several occasions as published here <https://www.ncffi.ie/the-future-of-coarse-angling-in-ireland>

Yours Sincerely,



Jack Tisdall
NCFFI Chair, National Coarse Fishing Federation of Ireland