

Summary of Submissions received in response to the Public Consultation to the draft Galway District - Brown Trout Daily Bag Limit - Rivers Clare, Abbert, Dalgan, Grange and Sinking bye-law

Inland Fisheries Ireland undertook a Public Consultation to the draft Galway District - Brown Trout Daily Bag Limit - Rivers Clare, Abbert, Dalgan, Grange and Sinking bye-law commencing on 15th August 2023. The public consultation process consisted of a notice placed in the Western People newspaper, the Irish paper Seachtain , social media and the IFI Website <https://www.fisheriesireland.ie/news/public-consultations> . The consultation process ran for a 4-week period concluding on Thursday 14th Sept 2023.

The purpose of the public consultation was to seek submissions from the public in relation to an amendment to the current 'Conservation of Trout bye-law No. 840, 2008' which currently makes provision for a daily bag limit of four brown trout on the rivers listed within the bye-law. The amendment is to make provision for a new bye-law to reduce the daily bag limit of four brown trout to two brown trout for the Rivers Clare, Abbert, Dalgan, Grange and Sinking in the Galway Fishery District.

There were 176 submissions received in response to the public consultation by way of email and letter. These can be found in Appendix 1 of this document. In total 121 submission were in favour, 50 objections with five submissions requesting the bye-law to go much further. This represents 69% fully support the bye-law, 28% against and 3% wish for the bye-law to provide for additional restrictions. The points for and against the proposed bye-law are as follows.

Summary of the key points made in favour of the proposed bye-law

In favour of bye-law

- The 2 trout bag limit per day should be made nationwide to include all the Great Western Lakes as this shows responsible management of wild brown trout stocks. This reduction shows that anglers are prepared to play their part in conservation.
- The daily bag limit should go a step further and reduce to 1 trout per day. 2 trout limit still represents a generous daily limit. It should also incorporate 'Catch and Release only' for months of August and September and possibly all season long. Catch and Release represents an important aspect of sustainable angling.
- This is a positive step in the right direction and a great way for anglers to show their conservation efforts towards wild brown trout which will benefit both the Clare River and L. Corrib.
- All fish over 5-6lb should be returned alive to protect the spawning fish. In fact, some submissions suggest all fish over 3 lb should be returned alive.
- Many angling clubs have introduced similar bag limits on their catchment for numerous years and has helped to sustain salmonid populations in these rivers and lakes.
- There have been considerable declines in brown trout catches over the past decade with many reasons for this e.g. Water quality, predation, climate change, intensive farming practices and land drainage to name a few and there are no quick fixes. Angling pressure is also a factor. However, conservation measures through bag limits are necessary in protecting the sustainability of wild fisheries.

- The Clare river is unique in that many trout migrate from L. Corrib in early summer holding up in the Clare river before spawning in their many tributaries later in the season. These spawning fish need protection, and a 2 trout bag limit will help to conserve further spawning fish.
- Bye-law 840, 2008 is not working and so by protecting the main spawning rivers that feed into L. Corrib will ensure that more spawning fish will help with recruitment of future offspring.

Summary of the key points made objecting to the proposed bye-law;

- No science to support bye-law.
- Pike are a greater threat to trout in this catchment than angling.
- Water Quality needs to be controlled.
- No evidence to support anglers as a threat to brown trout stocks.
- Some anglers disagree with Catch and Release angling as many trout that are released die anyway.
- Remove the Pike and Coarse fish bye-law 806 and 809.
- The proposed bye-law undermines the Western Lakes Plan.
- The Habitats Directive and the Water Framework directive is not applied.
- Most anglers catch less than 2 trout in any day so no need for the bye-law.
- The 2 trout bag limit on the Clare River will mean a two-tier system in place for this catchment - 4 for Corrib and 2 for Clare River. So, Anglers could essentially catch 6 per day on the catchment.
- The bye-law is based on human sentiment not on science.
- Predator Control of Cormorant/Mink/Pike would far out weight a bag limit on trout.
- Trout are not an Annex 11 endangered species.

Other comments

- All Angling should be prohibited between 1st October and 15th February on the Corrib catchment to protect spawning trout and salmon. This should be included within the bye-law.
- Pollution/Water Quality/Invasive species are a threat to this catchment which needs to be addressed.
- Prioritise habitat restoration – spawning habitat and maintenance annually.
- Closure of hatcheries.
- Not enough funding for trout angling clubs.

Appendix 1 – Full list of submissions received

Public Consultation Submissions received in response to the proposed 'Galway District - Conservation of Trout in the Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-law'				
Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC 1	In favour of the draft bye-law	I am in favour of the submission supporting the new draft Bye-law as a conservation measure to give more protection for mature trout in the Clare River system. A 2 fish limit with no fish measuring under 13 inches for the Clare River catchment will help conserve precious stocks of wild brown trout native to this catchment.	11/08/2023	14/08/2023
PC2	Object to the draft bye-law	I and many other citizens around the Country are being severely prejudiced and disenfranchised by the failure of IFI to publish on line the proposed new Bye Law. I now formally call upon IFI to so do and recommence the Statutory process	15/08/2023	15/08/2023
PC3	In favour of the draft bye-law	This should be made nation wide. Great idea. No one needs 4 fish a day. Make all competitions catch and release as well!	16/08/2023	17/08/2023
PC4	In favour of the draft bye-law	Great idea on the 2 fish limit byelaw Apart from allowing one fish over 10lb to be kept. Would suggest revision that all fish over 5 or 6lb weight must be returned alive	17/08/2023	17/08/2023
PC5	In favour of the draft bye-law	<p>This parlous trend of poor fishing is now repeated year after year. There has been no positive sign of long-term recovery. To add to the problem, anglers are now better equipped, better informed, and they fish more intensively over longer periods of time. As a consequence, the window of exploitation has increased, and with it the level of exploitation has increased. It now takes fewer anglers to achieve the same detrimental effect. An angler equipped with a good boat and engine, a knowledge of the seasons and the methods required to catch trout leaves the fish with no areas of sanctuary, or no period where they cannot be exploited. In 2023 we need to be aware of this. The Bye-law no. 840 2008 isn't working, and if our fisheries are to recover we need to change this outdated bye-law, and we need to do it quickly. A good area to begin is with one of the main spawning rivers which feed into lough Corrib, the Clare River and its tributaries. The importance of the Clare river system is well documented. The IFI/Queens report underlines the importance of the rivers Clare, Abbert and Grange for Corrib spawners. It also states that 'the Clare system is the largest of all the lough Corrib catchments and is also important in terms of Atlantic salmon production'. On page 35 it states 'While the Clare river is also known to support comparatively smaller proportion of river resident brown trout (i.e., trout that do not migrate to the lough at all but spend their whole life cycle within the Clare system from juvenile to adult)'. In the same report, on page 34, it also stated 'taking into consideration adult lake samples collected in 2012, which involved a sampling design that allows for accurate representation of the Lough Corrib adult brown trout stock, the main contributors to the lake were Abbert and Grange (~27%)'. These tributary rivers are part of the Clare River system, and the report confirms the significance of the Clare River system as a net producer of wild brown to Lough Corrib. These are unique trout which just like the dollaghan of Lough Neagh grow to a large size. They are produced in the Clare river and then drop back to the Corrib to grow, and reach maturity. As they become mature fish, these trout then run the natal river to produce their own kind. However, once they are in the confines of a river the trout are easier to locate, and therefore more vulnerable to angler exploitation. It is an accepted fact that trout caught in the Clare river are of a high average weight, with many of the fish caught ranging from 3lb to 6lbs or bigger. Trout of this size now attract a lot of attention from anglers, and anglers from all over Ireland and from abroad are now targeting these fish. Once they begin running the river, these unique trout become more vulnerable to anglers and they are exposed to the risk of over exploitation through the actions of increased rod effort. The mature trout of the Clare river deserve more protection. The new proposed Bye-law No. XXX 2023 would provide them with this protection. 'Limit your Kill, don't Kill your Limit'. We have to limit the kill rate and bring it down to level which will give our wild fisheries a chance to recover. This imbalance of the population isn't the result of a water quality event, modern farming practices, water abstraction, land drainage or the predations of pike. The imbalance of the population distribution on Lough Mask is clear unequivocal evidence of an angler inflicted impact, and it is the fallout from the over-cropping of the three year class of fish. We believe that is a worrying trend and it is one that we should be concerned about. The adult trout which run the Clare River to spawn are unique fish. They have already been exposed to exploitation by anglers in the Corrib before they commence running the river in June, and in the confines of the river their exposure becomes greater. Don't we owe it to these unique trout, to provide them with a level of protection which will give a greater chance to complete the run successfully and procreate their kind. The reduced bag limit to two fish will help, but we need to send a clear message that it isn't a target. If we can limit the Kill rate, then as a conservation measure it will work.</p> <p>The IFI proposed new Bye-law No, XXX 2023 is a positive proposal, and it is a conservation measure which I fully support. In the words of Lee Wulff in the 'Handbook of Freshwater Fishing' 1939, "Game fish are too valuable to be caught only once" and whilst we are not advocating catch and release, we are stating that the wild brown trout of the Clare system are to valuable to be over-cropped before they have fulfilled their primary function in life, which is to reproduce.</p> <p>¹Dr Karen Delanty and Prof Martin O'Grady et al - POPULATION STRUCTURE AND GENETIC STOCK IDENTIFICATION OF Lough Corrib Brown Trout. IFI/2022/1-4581</p>	17/08/2023	18/08/2023
PC6	In favour of the draft bye-law	I support the Clare River brown trout bag limit of 2 trout per day.	17/08/2023	18/08/2023
PC7	In favour of the draft bye-law	I believe reducing the bag limit for trout from four to two is a good idea. Fishing is a unnecessary pressure on fish stocks in these rivers when trout and other fish already have the pollution and climate change pressures to contend with already	17/08/2023	18/08/2023
PC8	In favour of the draft bye-law	I would actually support the further reduction to one trout per day if proposed.	20/08/2023	21/08/2023

Public Consultation Submissions received in response to the proposed 'Galway District - Conservation of Trout in the Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-law' Aug-Sept 2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC9	In favour of the draft bye-law	Cairde an Chlair, a federation of four member angling clubs with fishing on the Clare river and a membership totalling 400 (approximate figure) members fully support the new proposed draft Bye-law, cited as Galway, District - Conservation of trout in the Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-law No. XXX - 2023. - DOCUMENT ATTACHED	20/08/2023	21/08/2023
PC10	In favour of the draft bye-law	I agree with the 2 trout limit and hopefully this will be the beginning of anglers looking after our Wild Brown Trout going forward.	20/08/2023	21/08/2023
PC11	In favour of the draft bye-law	As a former resident of Galway for 15 years and now a visitor from the UK to fish on the Corrib and river Clare and tributaries I definitely agree with the reduction in bag limit from 4 to 2 trout. This will definitely help the conservation of trout stocks for the river itself and also for Lough Corrib	21/08/2023	21/08/2023
PC12	In favour of the draft bye-law	I am a regular fisher in Ireland and it is most important to me that the fish I catch are wild brown trout. Ireland is one of the last places in Europe that has such a diversity of wild trout and it is very important to me that this does not change. I totally agree with the proposal to implement a two fish limit on the Clare river." I see this as a step forward for the conservation of your fabulous wild brown trout stocks. This move will improve the health of the fish stock and is a very positive step forward for Irish wild trout.	21/08/2023	21/08/2023
PC13	In favour of the draft bye-law	<p>I fully support and endorse the proposed new fishery byelaw, which seeks to limit the number of brown trout that any person can take by rod and line in a single day to two fish.</p> <p>It is a shame the byelaw doesn't also seek to provide increased protection to trophy sized brown trout, as these are the fish which have the most potential to maximise natural production and attract more anglers to the area in search of truly special Corrib specimens.</p> <p>With so many issues and pressures adversely impacting on the ecology of the Corrib system, it is essential to put in place conservation measures now that have the very best chance of protecting and improving the entire fishery for future generations.</p> <p>The quality and sustainability of the fishery is of paramount importance, both locally and internationally and although unpopular with some, further measures are undoubtedly required to ensure the system maintains its reputation as a world class fishery. This proposed byelaw change is a very small but essential step towards ensuring that natural wild trout populations are given adequate protection from those that might wish to excessively exploit vulnerable stocks.</p> <p>My interests in the Corrib and tributaries are twofold:</p> <ul style="list-style-type: none"> • As a visiting angler. I have made the pilgrimage to the Corrib on numerous occasions and value the fishery as one of the finest trout fisheries in the world. I have, however, witnessed the slow decline of the fishery from my earliest visits 40 years ago, to how the fishery is performing today. Exploitation of the stocks via "catch and kill", especially when combined with modern methods, equipment and technology, have left the stock vulnerable to over exploitation, with knock-on implications for natural recruitment. • As a fishery professional, with 40 years working in the fisheries conservation sector. I have visited The Clare and Abbert river in a professional capacity. We know from experience that to maintain, improve and develop any fishery, it is essential to have joined up management for the entire system. I hope that a move to restricting the number of trout that anglers can kill via this proposed byelaw will eventually result in a change in attitude towards conserving these special fish and result in a greater uptake of catch and release tactics throughout the Corrib and wider catchment. 	21/08/2023	21/08/2023
PC14	In favour of the draft bye-law	I fully back and agree with the proposal of a 2 bag limit. Our club has a 1 bag limit since this year. It's a great move in the right direction.	21/08/2023	22/08/2023
PC15	In favour of the draft bye-law	100% behind this proposal. Fantastic idea. long needed. Any club member like myself would agree	21/08/2023	22/08/2023
PC16	In favour of the draft bye-law	Tuam anglers association fully support the proposal for a 2 bag limit. We have a club bag limit of 1 fish already	21/08/2023	22/08/2023
PC17	In favour of the draft bye-law	I support the two fish byelaws for the Clare river and its tributaries	21/08/2023	22/08/2023
PC18	In favour of the draft bye-law	Public consultation, clare River brown trout bag limit Good idea to reduce bag limit to 2 trout	21/08/2023	22/08/2023
PC19	In favour of the draft bye-law	I am in total agreement that the bylaws with regard to the bag limit in this catchment should be change to either a 2 bag limit or even a 1 bag limit..also , please specify the length of trout which can be taken, ie 33 cm , be measured from the nose to the "fork" of the tail.Finally , this new proposal should include the great western lakes of Corrib , Mask & lough Carra Hoping you are successful with changing this bylaw , so that future generations can enjoy what we enjoy today	21/08/2023	22/08/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC20	In favour of the draft bye-law	I strongly believe that the bag limit should be reduced from four fish to two fish to conserve fish stocks in both the rivers and also the Corrib. If this and other remedial measures are not taken the fish stocks will be severely affected in the years to come . I also believe that the minimum size limit should be increased to 14 inches - similar to other fisheries throughout the country.	22/08/2023	22/08/2023
PC21	In favour of the draft bye-law	i think the two bag limit is enough for any angler since the have to to think about other fisher men	21/08/2023	22/08/2023
PC22	In favour of the draft bye-law	As a professional fishing guide and tour operator, I bring groups of anglers to the west coast of Ireland on a regular basis. In order to preserve and increase stocks of trout, I support the imposition of a 2 fish catch limit on the Clare River.	22/08/2023	22/08/2023
PC23	In favour of the draft bye-law	1. Water quality issues, increase weed and decline hatches needs to be addressed. 2. More habitat restoration on the Clare river is needed to improve spawning but also protect juvenile fish during their early years before they head to the lake. 3. Fish over 5lb should not be kept as they have large spawning potential and have obviously good genetics to pass on.	21/08/2023	22/08/2023
PC24	In favour of the draft bye-law	I would like to support the proposal to reduce the bag limit on the Clare river and other rivers in the Galway District, please. A 4 trout bag limit is too generous and needs to be reduced in an effort to preserve the trout population's broodstock. Thank you for your support on this matter.	23/08/2023	23/08/2023
PC25	In favour of the draft bye-law	I [REDACTED] member of the Milltown angling club fully support the new proposed draft Bye-law, cited as Galway, District - Conservation of trout in the Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-law No. XXX 2023.	23/08/2023	23/08/2023
PC26	In favour of the draft bye-law	I write to advise that I am in favour of recommending a daily bag limit of 2 trout on the River Clare Reasoning 1) Pike are large fish that can grow over a metre in length. 2) It is found all over Ireland in lakes and slow-flowing rivers and canals that have a lot of vegetation. It uses these plants as hiding places when hunting, bursting out with remarkable speed to catch fish, frogs, small mammals or ducklings. 3) Young pike called 'jack' and will eat small fish and invertebrates 4) Pike spawn between March and May, returning to the same place every year. A large female pike can produce up to 500,000 eggs in sharp contrast to female brown trout who only produce a minute fraction of the female pike colossal numbers 5) A pike can eat a prey item up to half its own body weight, even taking moorhens or young ducks. 6) Because of its size and predatory nature there are many stories about very large pike. The largest specimen caught in the UK & Ireland so far was found in 1992 in a lake in Wales: it weighed in at just over 21kg - over a third of the weight of an average British woman. Larger fish have been caught abroad and there are stories of huge pike possibly weighing up to 42kg. 7) The great lakes Lough Corrib, Mask & Conn are the last game preserves of the Irish Wild Brown trout in Europe and the River Clare as the Corrib's major nursery should be preserved for Ireland's declining native Brown trout population 8) The abundance of Pike highlights the recent extinctions of two native Arctic charr populations in the West of Ireland, one population from the Lough Conn catchment, and a second from the Lough Corrib catchment. The importance of the charr population in Lough Mask (Lough Corrib catchment) is emphasized, as it is one of the last extant examples of charr from a large Irish alkaline lake.	24/08/2023	24/08/2023
PC27	In favour of the draft bye-law	I have been fishing The Clare river for many years and I am a member of Tuam Anglers Association. I fully support the proposed two brown trout limit on the Clare river system. I believe this is a major step in the right direction for the conservation and protection of this wonderful wild resource.	24/08/2023	24/08/2023
PC28	In favour of the draft bye-law	This is my submission to support the 2 trout bag limit for the Clare River.	24/08/2023	24/08/2023
PC29	In favour of the draft bye-law	I'm writing to give my support to the conservation measure proposed by Inland Fisheries Ireland, for a bag limit of two brown trout measuring no less than 13 inches for the Clare River, cited as Galway District - Conservation of trout in Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-Law No. XXX 2023. This is a positive conservation measure, and one which all anglers who are concerned about the decline of our fisheries should support.	24/08/2023	25/08/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC30	In favour of the draft bye-law	Lowering the trout kill limit can yield multifaceted advantages. By permitting a greater number of trout to complete their life cycles, the potential for enhanced spawning and subsequent juvenile trout survival amplifies. This bolstered population could, in turn, significantly improve angling opportunities, benefiting local communities and the broader fishing industry. In essence, advocating for a reduction in the trout kill limit underscores a commitment to sustainable ecological practices and responsible management of these invaluable aquatic resources. It safeguards not only trout populations but also the intricate interplay of life dependent on them, fostering resilient ecosystems for current and future generations.	25/08/2023	25/08/2023
PC31	In favour of the draft bye-law	Reducing the daily kill limit for trout from 4 to 2 fish in the Clare River system will yield significant benefits for both the ecosystem and angling community. This conservation measure ensures the preservation of vital brood stocks, which are essential for sustaining healthy trout populations. By decreasing the daily kill rate, more mature trout are left to reproduce, maintaining genetic diversity and improving overall population resilience.	25/08/2023	25/08/2023
PC32	In favour of the draft bye-law	I am mailing to give my support to the Conservation measure proposed by Inland Fisheries for a bag limit of Two Brown Trout measuring no less than 13 inches for the Clare River cited as Galway District and also the Conservation of Trout on the Abbert, Dalgan and Grange. This is a positive Measure and I hope you will consider it.	25/08/2023	25/08/2023
PC33	In favour but Bye law not going far enough.	<p>I am writing with regard to the above draft byelaw as a frequent visiting angler to Ireland and as a professional fisheries biologist with some 43 years experience in the field</p> <p>2. The current byelaw covering daily trout bag limits was introduced in 2008 and allows anglers to take 4 fish over 33cm.</p> <p>3. Since that date there has, by common consensus, been a significant decline in brown trout catches within the Lough Corrib catchment of which the Clare, Abbert Dalgan, Grange and Sinking River form an important part. Whilst the causes of this decline can be debated, the need for conservation of the remaining stock of wild brown trout cannot.</p> <p>4. Genetic studies by Delanty and O'Grady¹ highlight the importance of the Clare River system to Lough Corrib, noting that 'taking into consideration adult lake samples collected in 2012, which involved a sampling design that allows for accurate representation of the Lough Corrib adult brown trout stock, the main contributors to the lake were Abbert and Grange (~27%)'. These tributary rivers are part of the Clare River system, and the report confirms the significance of the Clare River system as a net producer of wild brown to Lough Corrib.'</p> <p>5. Excessive cropping of fish within the Clare system will thus have a direct impact overtime on fish stocks on both the system's rivers and Lough Corrib itself.</p> <p>6. Data from numerous peer reviewed studies across the world has shown that the control of exploitation of fish by anglers has an important role in stock conservation. Fish killed cannot breed. In the absence of adequate spawning stocks, the population decline will be rapid.</p> <p>7. The present byelaw allows each angler to take up to 4 fish daily. Modern fisheries management would suggest that this level of exploitation is unlikely to be sustainable in the longer term, particularly in the absence of any kind of daily rod limit being placed on the fishery; bag limits are most effective when this is the case.</p> <p>8. There thus seems a strong argument to impose a more restrictive bag limit on the 'precautionary principle' basis</p> <p>9. This byelaw strikes a reasonable compromise between the precautionary principle of restricting take and protecting the spawning stock of these valuable rivers, and allowing anglers to kill two fish daily, a number that should satisfy all but the most-greedy.</p> <p>10. It also posts an important signal to anglers that IFI recognises the vulnerability of brown trout stocks in both the Clare River system and wider Lough Corrib catchment and will, where necessary take action to protect them from over-exploitation.</p> <p>11. As a fisheries professional it is gratifying to see small but positive management prescriptions being applied by IFI to protect Lough Corrib and its trout stocks. There seems little doubt that further steps will be needed in due course.</p>	25/08/2023	28/08/2023
PC34	Object to the draft bye-law	I have yet to see any evidence that river anglers are putting trout fish stocks at risk. My concern is that the new byelaw represents a creeping imposition of regulations on river anglers whilst little or no restrictions are placed on the corrib anglers. It can only be a matter of time before you try to impose a trout licence again under the guise of conservation.	25/08/2023	28/08/2023
PC35	In favour of the draft bye-law	I am in favour of the 2 fish limit proposed for the clare river	25/08/2023	28/08/2023
PC36	In favour of the draft bye-law	I am in favour of the 2 trout bag limit	25/08/2023	28/08/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC37	In favour of the draft bye-law	<p>The highlight of my angling year is to visit the West coast of Ireland from the UK and fish on the world famous Lough Corrib for wild brown trout, so I would whole heartedly support the IFI initiative to introduce a new bye law to reduce the daily bag limit to 2 trout on the Clare River catchment. The implementation of this new bye law to decrease the allowable trout kill from 4 fish to 2 in the Clare River System, holds the promise of yielding substantial benefits for fish stocks in Lough Corrib. This transition represents a proactive step towards the conservation of aquatic ecosystems and the preservation of sustainable angling practices.</p> <p>By enforcing a stricter catch limit, the Clare River's brood stock trout population can find some respite from the pressures of overharvesting. This respite is crucial for their ability to reproduce and maintain robust population levels. A diminished kill rate will contribute to the restoration of a balanced age structure within the trout population, enhancing their reproductive potential and aiding in the sustenance of the entire ecosystem. The interconnection between the Claire River and Lough Corrib necessitates a holistic management approach. As adult trout migrate between these water bodies for spawning and feeding, the reduction in trout kills will help ensure a healthier population that can support successful migration and contribute to the genetic diversity of Lough Corrib's trout community.</p> <p>Beyond the direct ecological advantages, this conservation effort holds implications for the local economy and recreational activities. With healthier fishing populations, Lough Corrib can continue to attract anglers from throughout the world, bolstering tourism and the economy. A thriving ecosystem has the potential to yield positive economic outcomes in terms of increased revenue from angling related tourism and sustaining livelihoods of local communities.</p> <p>In conclusion, the shift from a 4-fish to a 2 fish kill limit in the Clare River system exhibits a positive, forward-thinking and brave approach to ecosystem management. By prioritising the health of trout populations, not only does this reflect a commitment to responsible environmental stewardship, but it also sets the stage for a balanced aquatic ecosystem that can be enjoyed by current and future generations of anglers. With the additional pressures of climate change affecting all our fish stocks we now need to be doing the "Right Thing" even if it goes against the many traditions of the past.</p>	25/08/2023	28/08/2023
PC38	In favour of the draft bye-law	I totally agree with this bag limit proposal.	26/08/2023	28/08/2023
PC39	In favour of the draft bye-law	I'm writing to give my support to the conservation measure proposed by Inland Fisheries Ireland, for a bag limit of two brown trout measuring no less than 13 inches for the Clare River, cited as Galway District - Conservation of trout in Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-Law No. XXX 2023. This is a positive conservation measure, and one which all anglers who are concerned about the decline of our fisheries should support.	26/08/2023	28/08/2023
PC40	In favour of the draft bye-law	I'm writing to give my support to the conservation measure proposed by Inland Fisheries Ireland, for a bag limit of two brown trout measuring no less than 13 inches for the Clare River, cited as Galway District - Conservation of trout in Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-Law No. XXX 2023. This is a positive conservation measure, and one which all anglers who are concerned about the decline of our fisheries should support.	26/08/2023	28/08/2023
PC41	In favour of the draft bye-law	Please note following submission supporting the new proposed draft bye-law cited as Galway District - Conservation of trout in Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-Law No. August 26th 2023.	26/08/2023	28/08/2023
PC42	In favour of the draft bye-law	I [REDACTED] on my own behalf and on behalf of our club would like to offer our full support for the proposed draft By- law cited as" Galway District - Conservation of Trout in Rivers Clare , Abbert, Dalgan, Grange and Sinking.	26/08/2023	28/08/2023
PC43	In favour of the draft bye-law	<p>" As a regular fisher of Lough Corrib I wish to add my support to the proposed new Bye-law and agree totally with this positive move to implement a two fish limit on the Clare river.</p> <p>My reasons for my support are as follows:</p> <ul style="list-style-type: none"> • To protect trout populations. When anglers are allowed to keep more trout, it puts more pressure on the fish population. Reducing the kill limit will allow more trout to survive and reproduce, which will help to boost the over population. •To improve fishing quality. When there are more trout in the water, anglers will have more opportunities to catch fish. This will lead to improved fishing quality, as anglers will be more likely to have successful outings. •To encourage catch-and-release fishing. Reducing the kill limit will make catch-and-release fishing more appealing to anglers. This is a more sustainable way to fish, as it allows the fish to be released back into the water unharmed. •To improve recruitment. The Clare River is a major spawning river for Lough Corrib, and reducing the kill limit will help to improve recruitment of trout. This is because more trout will be able to survive to spawn and produce young. 	26/08/2023	28/08/2023
PC44	In favour of the draft bye-law	As an active member of the Tuam Anglers Association. I would like to cast my vote in favour of the brown trout bag limit on the clare river.	27/08/2023	28/08/2023
PC45	In favour of the draft bye-law	I wish to submit my agreement to the proposal of reducing the daily bag limit from 4 to 2 brown trout. I believe this will benefit the waterways greatly and preserve the brown trout stock.	27/08/2023	28/08/2023
PC46	In favour of the draft bye-law	In reference to "Public Consultation – Clare River brown trout bag limit" , I believe that the daily bag limit of brown trout should be reduced to two fish. It is a very beautiful fish, a tough fighter, very attractive to nature watchers and anglers.	27/08/2023	28/08/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC47	In favour of the draft bye-law	I wish to put forward a reduction of the brown trout limit to be reduced to 2. This is the right thing to do to conserve the brown trout.	27/08/2023	28/08/2023
PC48	In favour of the draft bye-law	I would like to advise that this is my submission to support the 2 trout bag limit for the Clare river.	27/08/2023	28/08/2023
PC49	In favour of the draft bye-law	I regularly fish the Clare river. This is my submission to support the 2 trout bag limit for the Clare river	27/08/2023	28/08/2023
PC50	In favour of the draft bye-law	I regularly fish the Clare river. This is my submission to support the 2 trout bag limit for the Clare river	27/08/2023	28/08/2023
PC51	In favour of the draft bye-law	I fully support the 2 fish bag limit implementation.	27/08/2023	28/08/2023
PC52	In favour of the draft bye-law	Please be advised that I would like to support the 2 trout bag limit for Lough Corrib.	28/08/2023	28/08/2023
PC53	In favour of the draft bye-law	Please be advised of my support for the 2 trout bag limit on Lough Corrib.	28/08/2023	28/08/2023
PC54	In favour of the draft bye-law	This is my submission to support the 2 trout bag limit for the Clare River.	28/08/2023	28/08/2023
PC55	In favour of the draft bye-law	This is my submission to support the 2 trout bag limit for the Clare River.	28/08/2023	28/08/2023
PC56	In favour of the draft bye-law	This is my submission to support the 2 trout bag limit for the Clare River. (Closing Date Thursday September 14th).	28/08/2023	28/08/2023
PC57	In favour of the draft bye-law	Yes I agree to this proposal to stop the decline of trout in the proposed said rivers from being cleaned out by individuals who go out to these rivers take 4 trout in the morning go home for lunch and go out in the afternoon and take another 4 more, I would also support a ban on worm fishing in those areas if it was proposed	28/08/2023	28/08/2023
PC58	In favour of the draft bye-law	As an occasional angler on the Clare River, I wish to ad my name to submissions seeking to reduce the bag limit for trout on the Clare River system to two. Spawning trout migrating from Lough Corrib are extremely vulnerable to rod and line fishing during peak summer angling. Anglers need to be proactive in protecting stocks.	28/08/2023	28/08/2023
PC59	In favour of the draft bye-law	I wish to put forward a reduction of the brown trout limit to be reduced to 2. This is the right thing to do to conserve the brown trout.	28/08/2023	29/08/2023
PC60	In favour of the draft bye-law	I support the 2 fish bag limit on the Clare River Catchment.	28/08/2023	29/08/2023
PC61	In favour of the draft bye-law	Please a must be only two fish bag of trout limit for Clare River	27/08/2023	29/08/2023
PC62	In favour of the draft bye-law	I write to give my strong support to the conservation measure proposed by IFI for a bag limit of 2 brown trout- minimum 13 inches- for the Clare, Abbert, Dalgan, Grange and Sinking Bye-Law number XXX2023. This is a positive and much needed measure.	29/08/2023	30/08/2023
PC63	In favour of the draft bye-law	Please note the following submission supporting the new proposed draft bye-law cited as Galway District - Conservation of trout in Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-Law No. XXX 2023.	29/08/2023	30/08/2023
PC64	In favour of the draft bye-law	I agree with the proposed 2 fish bag limit.	29/08/2023	30/08/2023

Public Consultation Submissions received in response to the proposed 'Galway District - Conservation of Trout in the Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-law' Aug-Sept 2023

Ref No.	In Favour/Objection	Submissions Received	Date Received	Acknowledgement Issued
PC65	In favour of the draft bye-law	I strongly support. also proposes the introduction of catch and release in the months of August and September	29/08/2023	30/08/2023
PC66	In favour of the draft bye-law	I [REDACTED] member of the Milltown Angling Club fully support the new proposed draft Bye-law, cited as Galway, District - Conservation of trout in the Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-law No. XXX 2023.	29/08/2023	30/08/2023
PC67	In favour of the draft bye-law	I support the conservation measure proposed by IFI for a bag limit of two brown trout measuring no less than 13 inches for the Clare River, cited as Galway District - Conservation of Trout in the Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-law NO. XXX 2023. Having spent numerous vacations in Ireland, I am concerned about poor fishing on Lough Corrib. It is obvious that the fish stocks are under threat, and the proposed reduction of a two trout bag limit for the Clare River is a positive conservation measure, and one which all anglers who are concerned about the decline of Ireland's fisheries should support	30/08/2023	31/08/2023
PC68	In favour of the draft bye-law	<p>I am writing to you concerning the consultation about a proposed 2 fish limit for wild brown trout in the Galway Area of Ireland.</p> <p>In this era of declining fish stocks due to the many pressures of the modern world it seems almost inconceivable that limits on catching and killing wild fish will not be necessary in order to conserve this valuable stock, whether it be brown trout, sea trout or salmon. Full catch and release has become the norm in so many wild fish fisheries that it is now the exception rather than the norm to kill such a valuable resource. Undoubtedly as these restrictions increase, the pressure on those fisheries with over generous or a total lack of a limit will increase and particularly from those wishing to continue this practice unrestricted. It seems likely that the stock on such fisheries is therefore likely to face increasing pressures.</p> <p>I have been lucky enough to fish on Lough Corrib a number of times and have been more than happy to return my total catch in an effort to support this fabulous fishery. I appreciate that there are many who still wish to retain the occasional fish for the table but also those who seem happy to kill every fish that they catch. It is the latter group from whom we need to protect such a precious resource from excessive exploitation, and I am therefore in complete support of restricting this practice. I consider that a 2 fish limit still represents a generous limit on a wild fish fishery, but I support the proposal as a useful conservation policy at this stage and most definitely a necessary step in the right direction.</p> <p>I hope to continue to enjoy sport on the Clare river system and Lough Corrib for many years to come, travelling as I do, with a group of friends from the United Kingdom. I would hope that the contribution we make to the local economy highlights the value of maintaining and improving the quality of the fishing which so many International fly anglers hold in such high esteem.</p>	30/08/2023	31/08/2023
PC69	In favour of the draft bye-law	I believe this motion should be passed to help preserve the Wild brown trout. For too long large bags of trout are killed every year by anglers who care little for sustainability. This is a step in the right direction to help protect the jewel in the crown of Wild brown trout fisheries Lough Corrib.	31/08/2023	31/08/2023
PC70	In favour of the draft bye-law	<p>As a regular visiting angler to the west of Ireland and the multitude of pressures on the health of our rivers, I agree with this positive move to implement a two fish limit on the Clare river.</p> <p>This will hopefully cease the decline of the amazing fishery and restore stocks to when we have been so fortunate enough to experience in the past. The conservation of your wonderful wild brown trout is so important and also contributes greatly to the local economy with the visiting anglers it attracts.</p>	31/08/2023	31/08/2023
PC71	In favour of the draft bye-law	I fish the aforementioned rivers for a week a year and am encouraged by this proposal as it would help with fish stock and numbers, apart from helping the wild trout within these catchments. Therefore, I vote in favour of this proposal.	31/08/2023	01/09/2023
PC72	In favour of the draft bye-law	<p>I would like to advise that this is my submission to support the 2 trout bag limit for the Clare river.</p> <p>I would appreciate a return email confirming the delivery of the above.</p>	01/09/2023	04/09/2023
PC73	In favour of the draft bye-law	I'm writing to give my support to the conservation measure proposed by Inland Fisheries Ireland, for a bag limit of two brown trout measuring no less than 13 inches for the Clare River, cited as Galway District - Conservation of trout in Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-Law No. XXX 2023. This is a positive conservation measure, and one which all anglers who are concerned about the decline of our fisheries should support.	02/09/2023	04/09/2023
PC74	In favour of the draft bye-law	I'm writing to give my support to the conservation measure proposed by Inland Fisheries Ireland, for a bag limit of two brown trout measuring no less than 13 inches for the Clare River, cited as Galway District - Conservation of trout in Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-Law No. XXX 2023. This is a positive conservation measure, and one which all anglers who are concerned about the decline of our fisheries should support.	02/09/2023	04/09/2023
PC75	In favour of the draft bye-law	I support the two bag limit for the Clare river system.	02/09/2023	04/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC76	bye-law does not go far enough	<p>Corbally Anglers welcome and fully support constructive proposals which are in the best interest for the protection and conservation of both the wild brown trout and wild atlantic salmon species on the Lough Corrib, Clare River and its tributaries which in essence is all the one system. Regardless of the short timeframe we make the following observations and submissions .</p> <p>1. We are not aware and have not been made aware of any new scientific evidence to support the proposed new bylaw and the two trout per day bag limit. 2. Angling clubs, fishery owners, were not directly notified in writing.</p> <p>3. Whatever group or person who decided on the wording for this new proposed bylaw we feel do not have a clear understanding on how the Lough Corrib Clare River and its tributaries function as a complete unit.</p> <p>4. The wild Brown Trout born in one of the many tributaries off the Clare river and makes its way downstream over time to Lough Corrib is absolutely no different to the wild brown trout that ascends the Clare river over the summer months as they are all spawning trout at various stages of their life and indeed deserve the same protection. 5. Corbally Anglers will in no way support this new proposed bylaw in its present format as we feel it will do nothing for the conservation and protection of our wild Brown Trout as it is very one sided and simply does not go far enough. Whatever group or person who decided on the wording for this new proposed bylaw we feel do not have a clear understanding on how the Lough Corrib The wild Brown Trout born in one of the many tributaries off the Clare river and makes its way downstream over time to Lough Corrib is absolutely no different to the wild brown trout that ascends the Clare river over the summer months as they are all spawning trout at various stages of their life and indeed deserve the same protection. Clare River and its tributaries function as a complete unit 6 .Corbally Anglers will support and fully welcome a two Trout per day bag limit for Lough Corrib the Clare river and its tributaries as a whole to substitute the existing four trout per day bag limit that's already on the system. 7. Corbally Anglers will support the closure of the main spawning streams off the Clare River namely the Abbert, Grange, Nanny, Tonemile, Dawros, Dalgan and Sinking from the 1st September to the 1st April annually to protect both the wild brown trout and wild Atlantic salmon during spawning and mending after periods, together with the Salmon being a protected species deserving of conservation measures under the EU Habitats directive. 8. Corbally Anglers also call for a total closure of coarse fishing on the Clare River and its tributaries from the 1st October to the 1st March for the main Clare River channel and the 1st September to the 1st April for its tributaries annually for the protection of spawning Trout and Salmon. 9. Pike infestation has over the last few years got progressively worse and is now at a crisis stage where they are decimating Wild brown Trout and Wild Atlantic salmon smolts during migration and are calling now for the removal of 806 and 809 protection bylaws.</p>	03/09/2023	04/09/2023
PC77	In favour of the draft bye-law	I fully support the two bag limit. I think it's a great deal.	03/09/2023	04/09/2023
PC78	In favour of part of the proposal but cannot agree with it in total.	1. WTT generally advocates catch and release angling as a conservation measure that promotes fishery development while preserving the all-important fish stocks and, in this case, we certainly support the bye-law proposal at least to halve the current Clare bag limit. However, we do not support the clause in Article 3 which sets an arbitrary maximum weight limit of 10lbs (4.54kg) for a takeable fish. Such large fish are at the very apex of the population pyramid and by definition, limited in number and of the highest value to the fishery; those that are females are potentially the most fecund and thus their exploitation by rods threatens the sustainability of future populations. We would suggest that a maximum size for a takeable fish be set at 3lbs (c 1.36kg): a trophy fish in its own right. From an IFI fisheries enforcement viewpoint, a daily limit of 2 fish, neither heavier than 3lbs, is a simple measure to evaluate on the bank and a more than sufficient take for the table.	05/09/2023	05/09/2023
PC79	In favour of the draft bye-law	I have fished the Care river for many years, I wholeheartedly support the 2 fish bag limit Proposal.	06/09/2023	07/09/2023
PC80	Object to the draft bye-law	█ I wish to object to any reduction in baglimits on the Clare or anywhere on the Corrib system, this proposed reduction in Harvest numbers has no basis in Science, no supporting documents with the proof of what effect this will have as a measure and is based purely on human sentiment. I as an Angler and professional boatman fear that this bye law will lead to a reduction of visiting Anglers to the region as happened when restrictions were put in place on the bag limits for Pike and other Coarse fish. The bag limits may also eventually lead to the end of Trout Angling as fishing without harvest will become a target for animal rights activist we need proper management of the Corrib system. Protection Pollution control and Invasive fish such as Pike removed from the Lakes and Rivers.	07/09/2023	11/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC81	Object to the draft bye-law	<p>There are many factors to be taken into account when considering such a measure as implementing a byelaw. First, let us consider the size of Lough Corrib, it is a substantial body of water. There is no evidence of a pollution event which could have resulted in catastrophic fish kill. We can see the direct impact farming is having on our rivers and lakes. The evidence of excessive weed blooms is one indication of farm pollution. We look to the EPA to be more diligent in helping to identify problems in our water system and to implement strategies to protect and enhance our water quality. This is a basic requirement to help grow our trout population.</p> <p>There must be consideration of trout predation by the growing Pike population. The protection of the Pike must be re-visited. We ask the question, should a dominant predator fish be left to go unchecked? This has to be a significant factor in the reduction of the trout population in the Corrib catchment area. Brood stock trout can often be removed by trolling. The use of fish finders can pinpoint the location of fish. We must also consider that the trout has changed its diet and is now feeding on a variety of different insects, small fish etc? it may also be living in deeper water to avoid Pike?</p> <p>We cannot underestimate the impact of the construction industry over the past 25 years. Countless domestic and commercial estates were built close to streams, rivers, and lakes with little consideration for our water systems. Food processing, service and mechanical industries can have accidents which have a devastating effect on the ecological environment. Housing estates and one-off houses are serviced with septic tanks and treatment plants which need regular checking to prevent spillage into our water systems.</p> <p>Poaching can also be attributed to the decline of trout numbers in our rivers and lakes. Nets do not discriminate between trout or salmon. Killing fish with nets can have a massive impact on fish numbers in a short time frame. To make a judgment that penalizes the clubs on the river by bringing in a byelaw is the wrong approach. The issue is much more complicated and requires a more integrated approach. When trying to ascertain why the trout population is in decline on the lake a number of questions need to be answered. How many boats actually fish the lake on a yearly basis? What methods of fishing on the lake are yielding the highest trout kills? Data on pike numbers on the lake has to be assessed. How can the water quality be improved? Control the Mink population.</p> <p>The Clare River is an important part of the Corrib catchment area. It has a significant number of brown trout and salmon which spawn in the tributaries of the Clare River. Our club is aware of this rich resource and have made steps to educate our membership with regard to protecting our trout and salmon population from overfishing. We implemented our own 2 trout bag limit back in 2018 to help ensure that future generations will be able to enjoy the sport of fishing. We understand that this year other clubs on the Clare River have followed our lead and have implemented their own bag limits. Angling clubs on the Clare River are progressive and forward thinking. We are not waiting for trout and salmon stocks to deplete before affording the fish the protection it deserves. We do not subscribe to the conjecture that rod and line anglers on the rivers are responsible for poor fish returns on the lakes, we regard this to be just speculation without facts or studies to back this theory. We are against the implementation of a bag limit byelaw on the Clare River, our club has taken steps in 2018 to protect our trout population.</p>	07/09/2023	11/09/2023
PC82	In favour of the draft bye-law	I'm writing to give my support to the conservation measure proposed by Inland Fisheries Ireland, for a bag limit of two brown trout measuring no less than 13 inches for the Clare River, cited as Galway District - Conservation of trout in Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-Law No. XXX 2023. This is a positive conservation measure, and one which all anglers who are concerned about the decline of our fisheries should support.	10/09/2023	11/09/2023
PC83	In favour of the draft bye-law	I agree with the proposed new byelaw	10/09/2023	11/09/2023
PC84	In favour of the draft bye-law	I support the proposed changes to the bye law to set the bag limit at 2 fish per day.	10/09/2023	11/09/2023
PC85	In favour of the draft bye-law	<p>I write to confirm my support for the reduction in the daily bag limit from 4 brown trout to 2 brown trout on the following Rivers :</p> <p>Clare; Abbert; Dalgan; Grange and Sinking</p> <p>in the Galway Fishery District.</p>	10/09/2023	11/09/2023
PC86	In favour of the draft bye-law	I am writing as a fisherman and member of several angling clubs in Ireland (Bandon river & Argideen River) plus someone who fishes many of the Corrib rivers to support the 2 fish limit and return of all fish measuring under 13 inches for the Clare River Catchment.	10/09/2023	11/09/2023
PC87	In favour of the draft bye-law	████████████████████ member of Ballindiff and Headford and Corrib angling clubs, I 100% support the proposed action in reducing the bag limits as part of the ongoing conservation of wild trout stocks on the Corrib rivers and Lough.	11/09/2023	12/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC88	In favour of the draft bye-law	<p>I write in support of the proposed new bye-law to reduce the daily bag limit from 4 brown trout to 2 brown trout for the rivers Clare, Dalgan, Abbert, Sinking and Grange.</p> <p>In a time where our fish stocks are under increased levels of threat from various quarters, it is unthinkable that anyone would need or want to kill 4 fish in a month never mind per day. I have fished in this region for many years and always practice C&R as I hope to be in a position to fish there in the future. We need to protect these rivers and many more like it if we want to conserve our fish stocks for the next generation.</p> <p>I am hopeful that sense will prevail and that the merit behind this proposed new bye-law will be seen & understood and that the law will be passed</p>	11/09/2023	12/09/2023
PC89	In favour of the draft bye-law	This is my submission to support the 2 trout bag limit for the Clare River	11/09/2023	12/09/2023
PC90	In favour of the draft bye-law	This is my submission to support the 2 trout bag limit for the Clare River. (Closing Date Thursday September 14th).	11/09/2023	12/09/2023
PC91	Object to the draft bye-law	<p>Galway city salmon anglers who also fish for salmon on the Clare River are disappointed that IFI are proposing a non scientific reduction in the bag limit from four trout down to two on the Clare River and a number of its tributaries at a time when anglers around the country were starting to gain confidence in IFI and its CEO which are taking legal action against the unsustainable salmon farming industry in Ireland. That confidence and support will now be eroded as anglers around the country are saying, it's the Clare River now, will it be our river next.</p> <p>There is no scientific evidence that an enforced bag limit reduction is needed on the Clare River as a number of clubs have a voluntary bag limit of two trout anyway. It is nearly always the case that these bag limits are proposed by so called anglers that don't have the time to fish often, or are just not able to catch fish. The Clare River and its tributaries are hard rivers to catch salmon or trout on as there is only a small window of opportunity to fish them as the water is either too high or too low and if conditions are not right no salmon or trout will be caught no matter how good an angler you are. The majority of anglers who fish the Clare River, target salmon only and catch trout by accident, only a minority target trout. It is rumoured that the netters have a field day (or should I say night) on the Clare River when the conditions are right for netting, THEY do not discriminate between salmon and trout. More IFI patrols are needed.</p> <p>IFI, it seems, are again trying to blame anglers for the perceived (by a few) low catches of trout on the Clare River as an excuse for their own failings to detect polluters and poachers ,control invasive predators such as pike, cormorants and mink which are all having a detrimental impact on the Clare River trout and salmon populations.</p> <p>There is anecdotal evidence from anglers on the Clare River that large numbers of double figure weight predatory pike are congregating in the Clare River in February, March and April and devouring large numbers of juvenile trout and salmon smolts, yet IFI are turning a blind eye to this fact and do nothing about it, they prefer to blame the anglers.</p> <p>It is no secret that IFI are trying to introduce total Catch & Release (C&R) for all game and coarse fish in the next number of years and recreational anglers in County Galway and elsewhere are of the opinion that the proposed two trout bag limit is IFI trying by stealth to get total Catch & Release introduced, which by the way, is illegal in Germany and a number of other countries for fish welfare reasons, all fish caught in these countries must be killed. Some anglers believe that IFI are trying to drive a wedge between the Lough Corrib anglers and the Clare river anglers to further their aims of C&R, time will tell.</p> <p>Trout and salmon anglers are the voluntary guardians of our lakes and rivers and have been for many many years, they have immense knowledge of the biodiversity contained in them, handed down from generation to generation, yet IFI and other government agencies continue to ignore this vast knowledge and instead listen to advice from civil servants who may have never fished in their lives.</p> <p>Anglers want to have total confidence in IFI and support them in any way they can but if IFI continues to put obstacles in the way with unnecessary new restrictions on anglers then that confidence and support will not be forthcoming and anyomosity will fester between both.</p>	11/09/2023	12/09/2023
PC91A		<p>In the attached AIE document it is admitted by I.F.I. that no scientific research was carried out to determine the impact of rod and line catches of trout in the Lough Corrib SAC system, why then is I.F.I. trying to impose a further reduction of two trout per day on anglers when all other options to safeguard trout and indeed salmon stocks have not been tried first, such as stopping pollution, netting, predation by invasive pike, perch, roach, cormorants, mink and stopping coarse fishing on spawning rivers from 1st of October to 1st February annually. Both spent/kelt/slat salmon and trout are regularly caught during this period of so called coarse fishing. Also, river enhancement and maintenance should be carried out every year to keep spawning beds clear of silt, weeds and other obstructions to allow a constant riverbed flow, I.F.I should use their influence with other state agencies to make sure this is done.</p> <p>What is the point in implementing bag reductions and catch and release if the real impact problems are not addressed first?</p> <p>I would suggest that I.F.I abandon its proposed Clare River bag limit reduction before it causes it more embarrassment in the courts.</p>		14/09/2023
PC92	Object to the draft bye-law	<p>3 of the four rivers excluding the clare were poisoned no 1 ever faced prosecution there are no trout in the grange river but rather than spend money on a stocking program lfi would rather pretend it has brown trout and limit its catch .the sinking river is full of pike there are hundreds of pike at the mouth of the clare river every January onwards waiting for spent salmon, spent trout, salmon smolts,Etc and lfi do nothing to stop it.So what is the HIDDEN AGENDA.It is not the conservation of brown trout and Salmon</p>	11/09/2023	12/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC93	Object to the draft bye-law	1. How will this stop illegal fishing or netting . People who do this don't care about bag limits2. The bag limit is suggesting blame on the anglers for fish stocks ? Really? 3.What is the science behind this bye law? 4. What legal basis has this bye law? 5.We want the lake properly managed for Salmonids. Invasive fish species need to be controlled. Water quality needs to be improved. Our spawning beds must be preserved. The benefits of this would far outweigh a limit on potential catches. From recent happenings within IFI and from reading your recent Western lakes plan I have grave concerns as to the direction IFI are going and I am seriously questioning your agenda? Are IFI actually listening to the people who live on the lake shores, ie the real stakeholders? Who do IFI see as the stakeholders and influencers in their policies? Why were pike claimed incorrectly as native and the record books never rectified ? Is this a financial plan for the State as opposed to protecting an SAC?	11/09/2023	12/09/2023
PC94	In favour of the draft bye-law	At a recently convened meeting of the executive of Corofin Fishing Association, a decision was reached to support the proposal to introduce a new bag limit of two brown trout as a means to protect brown trout stocks in the Clare River.	11/09/2023	12/09/2023
PC95	In favour of the draft bye-law	This is my submission to support the 2 trout bag limit for the Clare River	11/09/2023	12/09/2023
PC96	In favour of the draft bye-law	Further to the proposal to reduce the daily bag limit for brown trout from 4 to 2 fish with no fish measuring under 13 inches (33cm) and only 1 fish greater than 10lbs within the Clare River Catchment, I whole heartedly support this initiative. Indeed I would actually support the further reduction to one trout per day across the board if proposed or indeed a strict mandatory Catch & Release only policy.	12/09/2023	12/09/2023
PC97	In favour of the draft bye-law	Yes a 2 trout limit is needed. It is plenty for anyone on the clare river and if implemented must be advertised/sign posted well as some don't even realise there is a trout bag limit!	12/09/2023	12/09/2023
PC98	In favour of the draft bye-law	I have visited the West of Ireland, in particular the Corrib catchment, on a number of occasions and hope to continue my annual pilgrimage to these wonderful waters. I wholeheartedly agree with the implementation of a two fish limit on the Clare River. I would suspect that the Clare River is one of, if not the most important of all the Corrib tributaries from a spawning perspective & as such it should have the highest form of protection in order to continue to feed a fishery that provides enjoyment for many thousands of people every year & surely brings a substantial sum of income to the local economies. The Clare River is already negatively impacted to a massive extent by dredging and channel straightening, alongside illegal fishing methods that adversely affect fish stocks, so the very least that fishermen could consider (if they seek continued or even improved sport) is a catch limit.	09/09/2023	12/09/2023
PC 99	In favour of the draft bye-law	as per PC 89	11/09/2023	12/09/2023
PC100	Object to the draft bye-law	There is no evidence to support angling as a sufficient threat to the trout population compared to invasive species or river pollution.In my opinion,the matter of invasive species such as pike and other coarse fish and pollution to the water needs to be addressed and controlled instead of using the angler as a scapegoat.	12/09/2023	12/09/2023
PC101	In favour of the draft bye-law	As a keen and concerned angler and regular visitor to the Clare River and Lough Corrib I would support the introduction of the new daily bag limit for the Clare River & rivers Abbert, Dalgan Grange.	12/09/2023	12/09/2023
PC102	Object to the draft bye-law	I am strongly opposed to the proposed reduction in bag limits on the Clare river or anywhere else on the Corrib system.Lough Corrib is famed all over Europe for its wild brown trout and salmon. Anglers come to Lough Corrib to catch and harvest brown trout and salmon.Is the department trying to kill the goose that laid the golden eggs by reducing the bag limit bit by bit until they ban harvesting altogether. If they are, then anglers will stop coming here. I also disagree with catch and release as I believe that a very high percentage of caught and released fish die anyway.If the reason for the proposed reduction in baglimit is for conservation reasons where is the science or support documents to prove that it works.If the department is serious about trout and salmon conservation then what is needed is proper management of the whole Corrib system.Removal of the bye-laws that protect pike and other coarse fish.The removal of pike especially from rivers where trout and salmon spawn and also from the lake is essential for the conservation of trout and salmon.Protection of the lake and rivers to prevent other invasive species being introduced.Pollution is another big threat to trout and salmon and should be controlled at all cost.	12/09/2023	13/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC103	Object to the draft bye-law	<p>Firstly, I strenuously object to the reduction in the Trout Bag Limits on the Clare System for the following reasons.</p> <p>1. The Irish Government is currently being pursued by the European Commission for their failure to apply conservation objectives on Lough Corrib SAC. This is a huge failure on the part of our authorities who have consistently failed to apply the Habitats Directive and the Water Framework Directive on SAC's. I.F.I. have been pivotal in that failure on Lough Corrib SAC. They have failed to establish SAC management objectives for Lough Corrib for over 17 years. Neither I nor my angler friends have any faith that IFI will turn the corner on that failing in advance of this proposal which was superceded by a conviction and fine. REF: Info document attached.</p> <p>2. In order to establish a conservation management plan, you need the relative independent science to back it up. Lough Corrib SAC consists of 44,000 acres which is not segregated from the River Clare System (it is all one SAC) that flows directly into it. The River Clare is a fish migration highway. Any sound scientific analysis would have to be geographical based, time based, depth based, seasonality based, species migration patterned etc., etc., IFI have not conducted this type of science. Please find attached the last scientific document relating to the Clare River. As you can see there is no mention of angling pressure on the system whatsoever as it doesn't exist.</p> <p>3. If appropriate assessments were carried out on Trout Anglers on Lough Corrib, it would be found that they are benign to the SAC. Why?</p> <p>(a) The overall trout catch on Lough Corrib SAC is relatively low. Evidence of this can be found in the trout angling competition results. Our analysis reveals that an average catch in a trout angling competition, where "catch and take" is adopted, is approximately 0.8 to 1.5 trout per angler per day. This is well below the 4 trout allowance provided for under the current legislation.</p> <p>(b) Trout anglers already apply the current legislation. They adopted this as a conservation initiative. Indeed, Trout Anglers have already adopted a number of conservation measures over the years. Initially an unlimited bag limit for trout above 8 inches was applied then an unlimited bag limit for trout above 12 inches was applied. Subsequently, a 13 inch size limit and a 4 trout bag limit was adopted. To state that Trout Anglers are not conservationists is disingenuous in the extreme.</p> <p>(c) Trout Anglers have been involved in the restoration of riparian zones on rivers and streams all over the Corrib catchment for years. I.F.I. have been very slow to acknowledge this contribution for fear of legitimizing trout angler rights and undermining their own involvement in the works.</p> <p>(d) Trout anglers have run trout hatcheries for decades around the Corrib. Last year alone, 300,000 ova were hatched out in the Oughterard Hatchery.</p> <p>(e) We have been involved in educational programmes in the local schools with enormous success.</p> <p>(f) We have conducted angler SAC awareness programmes involving litter control, general environmental awareness, invasive species reporting and control, kick sampling courses and have addressed numerous threats to Lough Corrib SAC including waste, dumps, water extraction, dog pounds and water treatment facilities.</p> <p>(g) Trout anglers are heavily involved in invasive species control. We do the jobs the I.F.I. won't properly address. We are being largely left to deal with the substantive issue of the presence of invasive pike and cyprinids on Lough Corrib. I.F.I. have failed to conduct proper controls on invasive pike numbers on Lough Corrib for years. This year they have only removed 2,500 pike. Most of whom are insectivorous (up to 8 inches long). Trout anglers are killing well in excess of that number and all of our pike catch are piscivorous and capable of breeding. Please find attached a document which the I.F.I. attempted to make confidential which was carried out in 1996. The numbers of trout being predated upon is a single year on Lough Corrib by pike, are incredible – 250,000. Based on our estimates of trout angler activity and the number of boats on Lough Corrib, we would estimate that the average trout catch ranges between 5-8,000 trout per year.....yet I.F.I. want to blame trout anglers via a baseless opinion that trout numbers have dropped. Would it not be a better management policy to reduce pike numbers if trout and salmon numbers are scientifically proven to have fallen? Trout anglers more than compensate for their trout harvest on Lough Corrib, yet I.F.I. do not want to acknowledge this. I.F.I. conduct little or no control measures on all the other invasive species on Lough Corrib.....again a complete management failure.'</p>	12/09/2023	13/09/2023

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PC103		<p>4. I.F.I. are incapable of running any SAC. They continually capitulate to political and vested interest pressure. I can give numerous examples of that failing. They simply do not understand that the integrity of an SAC is not up for debate. It is not a political football to be kicked around for people to attempt to apply their own self serving narratives.</p> <p>5. I.F.I. have consistently attempted to undermine the trout anglers over the last 20 years. They have attempted to sell a "Catch and Release" narrative to anglers and have even gone so far as not to financially support "catch and take" events. This is counter riparian stakeholder and a deliberate attempt to disenfranchise trout anglers. This is only one example of baseless narratives being imposed without sound scientific support. Please find attached the German approach to Catch and Release. Catch and Release is a "societal issue". I have no issue with an angler who wishes to practice it, that is his/her prerogative ...however, if someone wishes to express their right to take 4 trout, that is their choice. Remember, trout anglers on Lough Corrib SAC do not always come home with trout in their bags... there are a lot of days when they arrive home fishless. Then there are the individuals who make the choice to return the trout when they feel that they don't need it or simply wish to practice conservation concepts. Many of the trout anglers that I know intentionally practice some level of catch and release. I.F.I. would paint us all as mindless killers.. it serves their narrative.</p> <p>6. Trout are not an Annex II species. They have not been identified as being a species under threat. While they are an integral part of the SAC, they are not considered endangered. There is no evidence of their status changing to more critical levels...then why are we dropping bag limits?</p> <p>7. It is total lunacy to think that Salmon Anglers are allowed to catch 3 Annex II species in a day, while trout anglers are to be reduced to 2.... And at the same time only one invasive predatory pike can be removed in a day. This is absolutely ridiculous and again clearly demonstrates that I.F.I. are incapable of managing a SAC.</p> <p>8. I.F.I. are a broken authority. They only have 2No. board members. They have just been through a PAC investigation and a WRC investigation. There is also an ongoing Garda investigation. Are they really an authority to be relied upon to implement appropriate legislation? Public confidence in I.F.I. is at an all time low and staff morale is on the floor.</p> <p>9. The original 4 trout Bye Law 840 is also flawed, as it has never had an Appropriate Assessment Screening done for it. It has been referenced as part of overall trout plans for years... as such, it required an appropriate assessment under the Habitats Directive. So I.F.I. are attempting to bring this addendum to a flawed Bye Law 840 and they will probably attempt to produce screenings that should be relative to Bye Law 840 screenings.... But they don't exist! They are effectively compounding a past failure. This is more ridiculous mismanagement and demonstrates a clear lack of understanding of our European obligations in SAC's.</p> <p>10. It will be interesting to see the AA screening rationale that will be produced by I.F.I. for the reduction of the 4 trout bag limit to 2 and then to compare it with the Lough Conn and Cullen AA screening (if it even exists!), which allows for a limitless 12 inch trout catch and take fishery, especially when one considers the absolute lack of science on both systems. So are I.F.I. cooking the little science that they do have to suit their narratives? The answer is YES!</p> <p>11. The recent Great Western Lakes Plan is a document riddled with McLoone Report concepts. Again, I.F.I. do not want to deal with the substantive issues. They are intent on applying Mixed Fishery models on our salmonid SAC's. Nobody in I.F.I. seems to understand what a salmonid SAC is. At best, they pay lip service to the concept. How can I.F.I. bring in legislation controlling trout anglers catches whilst persisting with McLoone Report models that have been exposed to being unsound? Currently, Bye Laws 806 & 809 have been sent to the DECC for reassessment... they will return with another attempt to legitimize the existence of invasive species on our SAC's. This is contrary to European Law and this will be taken to task by the EU Commission. Again, this confirms the I.F.I.'s mismanagement and their "kick the can down the road" management attitude.</p>		
PC103		<p>12. I.F.I. have every intention to push this through... they even had the date that it will be signed on , on the initial draft? So much for a public submission process!!! Indeed they paid little or no heed to the submissions that they received for process for the Great Western Lakes Management Plan. Our information is that the vast majority of the submissions for the Great Western Lakes Management Plan made specific reference to the retention of the current 4 trout bag limit on the Lough Corrib SAC. Is the River Clare now not part of the Great Western Lakes Management Plan? When did this change?</p> <p>13. Let's say that they do get this silliness through.... Effectively I.F.I. will have created 2No. separate jurisdictions on a single SAC/water shed/river basin. So, an angler fishing on Lough Corrib is caught with 6No. trout in his/her boat. The I.F.I. officer states the law, attempts to proceed to fine the individual ...upon which the angler states that he/she got 4No. trout on Lough Corrib and 2No. trout on the Clare System. Can the I.F.I. officer prove otherwise? The genetic code in trout from the Clare System and Lough Corrib are the same. Equally, a River Clare angler could claim 6. No. trout by making the same argument. In effect, this "conservation proposal" has effectively increased the trout take on both systems to 6No. trout. Different instances could be argued but without clear evidence, all cases will fall like nine pins.</p> <p>14. The River Basin Management Plans are due to be issued in the next while. I have been informed that Lough Corrib will probably be included in the second tranche. The whole point of these plans is to get authorities to work together to address water quality issues. These plans are largely based on EU Legislative adherence and public involvement. I.F.I. want to start their involvement off with the introduction a Great Western Lakes Plan that doesn't adhere to these concepts. They want to demonstrate their ability to understand and appreciate cultural and riparian stakeholder involvement by curtailing their rights. This again clearly demonstrates their inability to anticipate upcoming changes to how systems are to be managed. Now, is not the time to attempt to disenfranchise stakeholders.</p> <p>15. I.F.I. discovered a non-native and invasive carp on Lough Corrib in the last month or so. Once that fish was put into Lough Corrib SAC it got the protection of Bye Law 806 which protects invasive cyprinids on Lough Corrib. There was no public comment by I.F.I. on this. Their apparent solution was to attempt to cut trout anglers bag limits? Who is managing our SAC.... Certainly not I.F.I.</p> <p>16. Conservation for conservation sake is absolute folly. It must be managed correctly. When Bye Laws 806 & 809 were brought into being, anglers were sold a narrative that the new immigrant population were cleaning out our fisheries. It was a lie. It was to be a temporary measure – another lie. 806 & 809 are still in situ.</p> <p>17. When Francis O'Donnell lobbied the trout anglers for their support to back the Great Wester Lakes Plan, he promised that the trout bag limits would not be affected. He also promised to get rid of Bye Laws 806 & 809 on the Lough Corrib SAC. So now he wants to reduce the bag limit and Bye Laws 806 & 809 remain in place! WOW!!</p> <p>18. I.F.I. have never given us our rights back, once they are gone, they are gone forever. So we are making a decision for your sons and daughters too.</p> <p>I am a conservationist and an angler, you will not tarnish me as being some sort of greedy killer, which is being entertained on your Facebook page. The narratives that you are selling are English Angling magazine based garbage. Where are their fisheries now? It is very clear that this attempt to reduce trout bag limits on the Clare System is precursor to attempting to initiate the same on Lough Corrib. That will not be entertained. I ask you to stop these school boy tactics or this will end up in court</p>		

Ref No.	In Favour/Objection	Submissions Received	Date Received	Acknowledgement Issued
PC104	Object to the draft bye-law	<p>The Ballindiff Bay Angling club are totally against the proposed Clare river bye Law Daily bag limit of two Brown trout, xxx2023 10/08/2023 (4022).</p> <p>We strongly object to this proposal on the following grounds. Lough Corrib is an (SAC) and it should not be split into sections. The Clare River is one of the major spawning tributaries for wild Atlantic salmon which is an annex II species and is protected under the Habitats Directive. Also a large population of wild Brown trout which migrate from the lower lake to the Clare River at certain times when water levels lets them get to their spawning rivers.</p> <p>Brown trout are not on any protected list and are not predominantly targeted for angling on the system as it is hit or miss with water levels and colouration of water making wild brown trout a difficult target for angling. In (2021) a water fish survey under the water frame work directive and the National Research survey programme (2021) carried out by Inland Fisheries Ireland (I.F.I) it states under the summary and ecological status, quote" while the numbers (CPUE) of brown trout have fluctuated across the survey periods, no obvious trend in population status was apparent. The length and age range of brown trout captured in 2021 was similar to that recorded in previous surveys conducted since 2008" end quote. Brown Trout are the 3rd largest biomass Fish species in the 2021 survey, Invasive non native Roach and Perch were the dominant fish species in terms of abundance biomass captured during the survey.</p> <p>It is our understanding that the majority of clubs on the Clare River system currently operates under a voluntary two trout bag limit so we respect clubs that do this on a voluntary bases. Salmon are the biggest target on the system as the Galway fishery has one of the biggest surplus harvests of wild Atlantic salmon in the country. We do not agree that a compulsory two bag trout limit under this proposed Bye Law on the Clare River will help conserve the trout population on this system as Angling has no impact on brown trout on the Clare River.</p> <p>To have a proper conservation plan in place on the Clare River all mitigating factors upholding the integrity of Lough corrib (SAC) should be in place. Lough corrib is also a protected Natura 2000 site of interest with important ecological status under the EU Habitats directive (92/43/EEC) Lough corrib is a Ntura 2000 protected site and is created under the European legislation These regulations transpose the EU directives into Irish National law. The protection of Non Native invasive fish spices on Lough corrib (SAC) Special area of conservation, with the Pike bye law of 2006 and the coarse bye law of 2006 fly in the face of any conservation measures on the Clare River.</p> <p>Northern Pike are consuming large numbers of Salmonid species and especially the brown trout population on the Clare River and at the mouths of spawning tributaries. The Bye laws (coarse fish bye law 806 of 2006 and the pike bye 809 of 2006) are repugnant to the EU habitats directive and the water frame work directive and they should be removed immediately on all (SACs). The consumption of brown trout alone from statistics from the central fisheries board confidential report in 1996 stated pike were eaten 255,000 trout in one year...please don't try and tell us anglers are having an impact on trout populations with this kind of predation. Stop blaming the anglers as an excuse.</p> <p>Our club is totally disappointed with the mismanagement of Lough corrib (SAC) over the past twenty years, the failure to save the owneriff system after the native trout populations were severely impacted and marginalised after illegal introduction of non native northern pike. The failure to implement the rehabilitation programme for that system is so disappointing and to think a huge system like the Clare River could fall under the same problems or a huge pollution disaster with the continued predation from pike so therefore we have no confidence in the IFI structure realising there is no budget in the organization to adhere to carry out their statutory responsibilities.</p>	12/09/2023	13/09/2023
PC104		<p>Our club is now of the under standing that there are individuals in the Department ofEnvironment along with individuals in IFI who would not support a totally managed salmonid fishery and proposals like this bye law of a two bag trout limit is to further split angling club relations on the Clare river and the lake with the help vested interest with an end goal of having a mixed fishery model. There is no science to prove angling is having an adverse effect on the Clare River to brown trout stocks.</p> <p>If there is a problem with the poaching of trout on the Clare River this is an operational matter for IFI, again it is not the angling clubs fault that inland fisheries Ireland can not secure funding from central government. the previous CEO of IFI withdrew staff and pike management programmes on Lough corrib and the Clare River and all the western lakes .IFI can not carry out their responsibilities on habitat management as the local trout and salmon clubs over the years have been putting money from their club members to prop up conservation works in streams and rivers, also planting trees to create buffer zones and working with farmers to improve water quality and biodiversity .</p> <p>The Ballindiff angling club is part of the Lough corrib Angling Federation and part of a huge conservation programme every year it is involved with the distribution of almost 300.000 unfed wild trout fry back into the owneriff system to try and reseed that system with native trout as we stated previously in this submission that was decimated and severely impacted by non native northern pike. The clubs on Lough corrib and the Clare River have been involved in trout conservation for the last fifty years by moving to a 13in length limit and also a 4 trout bag limit from no bag limit in 2008.</p> <p>The 4 bag trout bag limit in place at the moment bye law 840 is very questionable as there is no appropriate assessment screening done for it and this also contravenes the EU habitats directive.</p> <p>This proposed two trout daily bag limit for the Clare River including the Abbert, Dalgan, Grange and the sinking rivers is nothing but an exercise by a hand full of individuals to split angling clubs . Could there be an individual in the department of Environment with a bad taste on his mouth since the Rod licence dispute in the late 1980s if so please replace him.</p> <p>We do not support this proposed Bye Law in any form. Please stop trying to blame the trout anglers for your own mismanagement. The trust has broken down since this western lakes plan and the now two bag trout limit that we were told would not be on the discussion table well bigger fools us!!!!!!!</p> <p>Here is the list of species that come under the EU water frame directive listings for having influence on the ecology of native spices in Ireland. For some reason the IFI and NPWS other statutory bodies are neglecting to highlight this list when it comes to exposing non native and invasive spices. Certainly private company's used by IFI to do appropriate assessments screenings also fail to high light this list only to be concerned with invasive plant species but then again some of these people are ex IFI staff could you call that a conflict of interest???</p>		

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PC104		<p>Three fish groups have been identified and agreed for Ecoregion 17 by a panel of fishery experts (Table 1). In the absence of major human disturbance a lake fish community is considered to be in reference state (in relation to fish) if the population is dominated by salmonids (or euryhaline species with an arctic marine past) (i.e. group 1 fish species (natives) are the only species present in the lake) (Table 1).</p> <p>Table 2: List of the three fish groups identified for Ecoregion 17</p> <table border="1" data-bbox="349 395 981 719"> <thead> <tr> <th data-bbox="349 395 551 459">1. Natives</th> <th data-bbox="551 395 752 459">2. Non-natives influencing ecology</th> <th data-bbox="752 395 981 459">3. Non-natives benign (generally not influencing ecology)</th> </tr> </thead> <tbody> <tr> <td data-bbox="349 459 551 480">Brown trout</td> <td data-bbox="551 459 752 480">Roach</td> <td data-bbox="752 459 981 480">Tench</td> </tr> <tr> <td data-bbox="349 480 551 501">Sea trout</td> <td data-bbox="551 480 752 501">Perch</td> <td data-bbox="752 480 981 501">Rudd</td> </tr> <tr> <td data-bbox="349 501 551 521">Salmon</td> <td data-bbox="551 501 752 521">Pike</td> <td data-bbox="752 501 981 521">Stoneloach</td> </tr> <tr> <td data-bbox="349 521 551 542">Char</td> <td data-bbox="551 521 752 542">Bream</td> <td data-bbox="752 521 981 542">Gudgeon</td> </tr> <tr> <td data-bbox="349 542 551 563">Pollan</td> <td data-bbox="551 542 752 563">Dace</td> <td></td> </tr> <tr> <td data-bbox="349 563 551 584">Eel</td> <td data-bbox="551 563 752 584">Carp</td> <td></td> </tr> <tr> <td data-bbox="349 584 551 604">Shad</td> <td data-bbox="551 584 752 604">Rainbow trout</td> <td></td> </tr> <tr> <td data-bbox="349 604 551 625">3-spine stickleback</td> <td data-bbox="551 604 752 625">Chub</td> <td></td> </tr> <tr> <td data-bbox="349 625 551 646">9-spine stickleback</td> <td data-bbox="551 625 752 646">Minnow</td> <td></td> </tr> <tr> <td data-bbox="349 646 551 667">Brook lamprey</td> <td></td> <td></td> </tr> <tr> <td data-bbox="349 667 551 687">River lamprey</td> <td></td> <td></td> </tr> <tr> <td data-bbox="349 687 551 708">Sea lamprey</td> <td></td> <td></td> </tr> <tr> <td data-bbox="349 708 551 729">Flounder</td> <td></td> <td></td> </tr> </tbody> </table> <p><u>Data Analysis</u></p> <p>Data analysis will involve two steps</p> <ol style="list-style-type: none"> 1. Classifying lakes into fish types. Preliminary classification will be refined through graphical analysis (box plots, scatter plots-metrics vs. habitat variables such as lake size, alkalinity etc.), professional judgement and statistical tests of final classification hypotheses. The values and distribution of metrics will be compared among lake types. Lake types that appear similar (metric distributions must be similar) can be grouped together for final classification. Hierarchical cluster analysis (Ward's method) will be used to classify the lake fish types and validation of the fish end groups will be verified using the Multi Response Permutation Procedure (MRPP) in PCORD (McCune & Mefford, 1997) and other methods. MRPP is a non-parametric procedure for testing the hypothesis that there are no significant differences between two or more groups and has the advantage over ANOVA that it is not reliant on 	1. Natives	2. Non-natives influencing ecology	3. Non-natives benign (generally not influencing ecology)	Brown trout	Roach	Tench	Sea trout	Perch	Rudd	Salmon	Pike	Stoneloach	Char	Bream	Gudgeon	Pollan	Dace		Eel	Carp		Shad	Rainbow trout		3-spine stickleback	Chub		9-spine stickleback	Minnow		Brook lamprey			River lamprey			Sea lamprey			Flounder				
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PC105	In favour of the draft bye-law	I support the new conservation measure for the rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-law No. XXX 2023.	12/09/2023	12/09/2023																																										
PC106	In favour of the draft bye-law	I would like to agree to a proposal to reduce the daily bag limit of four brown trout to two brown trout on the rivers, Clare, Abbert, Dalgan, Grange, Sinking. It would mean a lot to me for the future of our wild brown trout's existence.	12/09/2023	12/09/2023																																										
PC107	In favour of the draft bye-law	I'm writing to confirm my support for the reduction in the daily bag limit from 4 brown trout to 2 brown trout on the rivers Abbert,Dalgan Clare Grange and Sinking, in the Galway fishery district.	12/09/2023	12/09/2023																																										
PC108	In favour of the draft bye-law	I am writing to you in support of the conservation measures proposed to reduce the daily bag limit of four brown trout to two brown trout on the Rivers Clare, Abbert, Dalgan, Grange and Sinking in the Galway Fishery District. With fish stocks at their current levels this is an important step in helping maintain the long term sustainability of these rivers.	12/09/2023	12/09/2023																																										

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PC109	Object to the draft bye-law	<p>The Proposed reduction in Bag Limits on the Clare River and its Tributaries, is wrong. It is based on a section of Angler sentiment by very vocal predator anglers whose agenda is aimed at moving Ireland's prime game fisheries towards a mixed fishery model. It has no scientific basis and I have seen no evidence that would make me support such a move.</p> <p>The four fish bag limit was introduced covering the entire Corrib catchment, all of the lakes and tributaries flowing into the Corrib system and it's distributaries at Galway.</p> <p>Why would IFI and the minister consider introducing this Bye Law which undermines the proposed Western Lakes Plan and ignores the vast majority of submissions which were received by them, which demanded proper management which was based on scientific reports i.e. Pollution control, Stream management, Predator, Invasive weed and invasive fish management?</p> <p>The plan did not provide for additional Staff to properly manage the above. A two Trout Limit is in place in the Midland and Shannon Fisheries, Bye Law No. 949 of 2017. The result of this is that these Lakes are now mixed fisheries (See my concerns in paragraph 1 above).</p> <p>Salmonid populations are under threat, not from anglers but from non-native, invasive species. A bye-law of this Nature will not help the Salmonid Population in Corrib or any other Lake against the onslaught of these illegally introduced species.</p> <p>Any such bye-law will be used by the State through IFI to reduce investment and effort in our Trout and Salmon Fisheries. The Bye Law will catch the concerned Angler who are invested in their River and lakes through club activities and funding contributions to stream enhancement projects etc. The proposed bye law will not change the fact that much of the threat to salmonids is a Fisheries Policing issue to address poaching, or a Pollution and Developmental issue. These issues would be better addressed if IFI were willing to manage these Fisheries correctly as Wild Brown Trout/salmon Fisheries, providing funding, manpower and a willingness to tackle invasive species whose numbers have grown due to a lack of control through electrofishing and gillnetting etc. The State is in neglect of its obligations under European and Irish Law, this Fishery is a Special Area of Conservation and has the ability to sustain the present Harvest Levels with proper management. The practice of catch and release as a fisheries management tool to reduce fishing mortality is only being proposed for the Clare River because of a push towards catch and release and a mixed fisheries (no maintenance) model.</p> <p>Fish mortality rates can be attributed to several factors; mortality due to predation from introduced Predators, mortality due to external factors, (water pollution, poaching, introduced species etc), natural mortality, incorrect handling during catch and release (think of IFI's campaign CPR- many lovely photos, lots of dead fish after being mishandled for prolonged periods) and angler harvesting. The occurrence of fish mortality due to fish disturbance and fish injury will increase due to catch and release angling. An increased emphasis on catch and release angling, as a means of preserving fish stocks, should not be jumped into. Germany and Switzerland, amongst other countries, has banned catch and release during recreational angling as it deems it to be inhumane. This makes catch and release a welfare issue. The recent shift towards catch and release angling in some quarters, is driven by the flawed assumption that catch and release angling automatically benefits stocks and will result in much lower total mortality rate than would otherwise occur.</p> <p>It is widely accepted that catch and release angling increases fishing-induced stress, injury, and mortality. It is easy to understand why animal welfare groups object to catch and release angling.</p> <p>Should this proposal be implemented, it is actually possible that the total annual harvest per angler will be maintained as anglers increase the number of fishing trips to compensate for reduced daily harvest limits i.e., mortality due to harvesting is unlikely to reduce (Bartholomew and Bohnsack, 2005).</p> <p>Angling by rod and line serves two purposes, to harvest fish for personal consumption and to satisfy the anglers' real desire to hunt and catch fish. The proposal to reduce harvest numbers in favour of catch and release angling will not benefit fish stocks; it will simply threaten the future of recreational angling and the many benefits it brings to communities around our western lakes and nationally.</p>	12/09/2023	12/09/2023
PC110	In favour of the draft bye-law	I am supportive of a daily bag limit of 2 brown trout on the Clare River and tributaries.	12/09/2023	12/09/2023
PC111	Object to the draft bye-law	<p>My name is [REDACTED] and I have lived [REDACTED] I am writing this email with regard to the proposed reduction to a Two bag fish limit of the Brown trout. I and my family live [REDACTED]. The Corrib has given jobs and food to countless generations of families. It is with a heavy heart I see that there is another consultation trying to be brought in to reduce the bag limit to Two. I feel that this is not a conservation measure to help with what is happening on the Corrib as a whole. Please can Inland fisheries and the Ministers involved sit down with the Angling groups and concerned anglers from around the Lake and listen to their concerns and work together on the ground instead of having to sit down to email or write letters of submissions to express our hurt and anger of the proposal to reduce the fish catch in our lake and rivers. If the science is out there to prove that rod and line are the main cause for the decline in fish numbers then we will work together to improve the stock numbers. I and countless others believe this is not the case. The work that the Inland Fisheries do is a wonderful service but as I and others know your hands are tied in what you can do with regard to finances and people on the ground to do the works involved. Please don't reduce the Bag limit Clare river to Two.</p>	13/09/2023	13/09/2023
PC112	In favour of the draft bye-law	I write to confirm my support for the reduction in the daily limit from 4 brown trout to 2 brown trout on the following Rivers Clare Albert Dalgan Grange Sin king	13/09/2023	13/09/2023
PC113	In favour of the draft bye-law	The East Corrb Alliance (ECA) is in favour of the proposed new Bylaw for the Clare River Catchment. In our submission to the Great Western Lakes Plan we suggested that such a bag limit should be introduced and we have not changed our view. We see this proposal as a conservation of fish stocks in these rivers which in our opinion will only increase the stock of brown trout in Lough Corrib.	13/09/2023	13/09/2023
PC114	Object to the draft bye-law	I am not in favour of the proposed bag limit of 2 brown trout 1. It simply doesn't promote fishing because 2 fish limit will soon become no fish limit 2. It's not a conservation measure it's a Control measure 3. Trout caught on rod and line numbers have no measureable impact on stocks 4. Catch and release is a modern feel good mindset but has no practical value in fact it's doing more harm on increased numbers of fish 5. Senior IFI officials should decide once and for all What side are they on Thanks	13/09/2023	13/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC115	In favour of the draft bye-law	As someone with deep Irish family roots and a strong connection to Ireland, I am particularly passionate about the preservation of its natural beauty and resources. Given my Irish heritage, I feel an even stronger sense of responsibility to contribute to the well-being of these precious waterways. Considering the current state of fish stocks in these rivers, I believe that implementing this adjustment is a crucial step toward ensuring the long-term sustainability of these ecosystems. By reducing the daily bag limit, we can significantly contribute to the protection and preservation of the brown trout population in these specific areas, ultimately promoting healthier and more balanced ecosystems. These measures align with our collective responsibility to act as responsible stewards of our natural resources, safeguarding the delicate ecological balance that sustains our aquatic environments. I applaud the proactive approach taken by Inland Fisheries Ireland in addressing this issue and firmly believe that such measures are essential for the continued well-being of these rivers and the communities that rely on them.	13/09/2023	13/09/2023
PC116	In favour of the draft bye-law	I write to confirm my support for the reduction in the daily bag limit for the Clare, Abbert, Dalton and Grange rivers.	13/09/2023	13/09/2023
PC117	In favour of the draft bye-law	I fully support the proposed by law for a reduced bag limit from 4 brown trout to 2 brown trout on the rivers Clare, Abbert, Dalgan, Grange and Sinking in Co. Galway.	13/09/2023	13/09/2023
PC118	In favour of the draft bye-law	I wish to add my support to the two fish limit rule proposed for the Galway Fishery District. This very much in line with the modern view of preserving wild habitats that are all too easily degraded by undue pressure. The beauty and appeal of the Galway Fishery District is the quality of the wild fish stocks within it. Wild environments are already under severe pressure due to climate change and other man made factors. If fish stocks are further degraded by excessive bag limits and fish kills by anglers, this can only be seen as a very short-sighted view by the current fishing community. If we wish to maintain great wild fishing for our children, a small amount of thought and restraint now can have a positive outcome for the future. I hope these thoughts can help in making the right decision to reduce the current daily bag limit within the Galway Fishery District of four brown trout to two.	13/09/2023	14/09/2023
PC119	Object to the draft bye-law	I am emailing you on behalf of Lough Corrib Angling Federation, the Federation consists of ten Corrib Clubs and is the largest representative organisation on the Corrib System, at our last meeting the Clubs rejected the proposed reduction and wish to objection to the reduced Bag Limit on the Clare River. The Clubs believe there is no Scientific base or proof for such a move and that in reality it will have no affect on the overall stock of Trout in the Corrib system, the Federation wish to see proper management of the system through Predation control, Stream enhancement and address the Pollution problems which are destroying spawning streams.	13/09/2023	14/09/2023
PC120	In favour of the draft bye-law	I support two bag limit for trout on the river clare	13/09/2023	14/09/2023
PC121	In favour of the draft bye-law	I support two bag limit for trout on the clare	13/09/2023	14/09/2023
PC122	Object to the draft bye-law	An angler on Lough Corrib, I would like to object to the reduction of the proposed bag limit on the Clare river. I do not see any evidence that there is any benefit in reducing the bag limit. The Corrib and Corrib system has pollution and invasive species issues that need to be address. Reducing the fish bag limit will not help this or any other problem with the Corrib	13/09/2023	14/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC123	Object to the draft bye-law	<p>Where is the Habbitats directive and the water frame work directive when you are introducing a new by law, sorry you don't apply them, thats why the irish government of are paying fines for having no clear conservation measures in place to up hold the integrity of lough corrib SAC..for the last 17yrs shocking! How can you blame anglers for low trout returns on the lake/rivers, when our citizens science says and shows very clearly that the daily average of an anglers catch is 1.5 trout! Ref. trout angling competitions. How can you as CEO stand over such deliberate nonsense as to blame anglers.Where is the Habbitats directive and the water frame work directive when you are introducing a new by lawinvasive fish namely Pike consume massive numbers of trout/Salmonids daily, in 1995/6 the fish survey by Dr Paddy Gargan and Dr M. O Grady the pike they took and open their stomachs, show the contains of trout weighed 4.6 tons of trout. From that their scientific data showed them that those pike had eaten over 255,000 trout in their life time before been killed. So you tell me how many pike are in the lake?? How many groups of that surveyed pike are in the lake, Nobody knows. But yet you want to blame the anglers. Shocking.You have minimum pike removal over the last number of years, and when you lift the few nets you have out, for some mad reason you reintroduce invasive non native pike of 85 cm back into our SAC when that alone is breaking the HD for who and why?That is Environmental Treason to our native Salmonids under the Habbitats directive., you are the same as the bucket guys that introduce other invasive fish into our lake eg,, carp oh by the way you protect those aswell under bye law 806!Take the easy option BLAME the anglers when most anglers let fish go. I'm not greedy for the freezer or vacuum packer to send trout fillets of to my friends in other durastrictions! When I kill pike most weekends, every pike I kill I SAVE a minimum of 28/30 trout over a year, that alone CREATES a trout fishing season for the average angler, do the numbers I kill 10 pike, it's 10 anglers that have a trout fishing season on the corrib system, when I reach my target of over 100 pike I have saved over 3000 trout, how many trout angling seasons have I CREATED for anglers, it goes on, and you want to blame ME for poor trout numbers on the corrib system by reducing the bag limit, I'm a conservationist NOT which the IFI is not.!</p> <p>The IFI cannot manage, maintain or up hold the integrity of lough corrib SAC, you have no staff, or the tools to maintain the SAC, there's a Garda investigation on going, the IFI are in front of the. PAC, along with the WRC, the IFI and you as the CEO are a broken body that clearly demonstrated to the public that you CANNOT carry on as a broken misleading body with no Sceince and relative data applied to your new bye law, where are the screenings for bye law 840.please show me? , it's so serious it's beyond belief, but you carry on with your LIES. Can you as the CEO of the IFI show the scientific data the impact of rod and line is having on the brown trout stock as it stands? Read attached file. Is there a screening for a 2 fish limit that would have to outline the negative impact that 4 fish limit is having on the integrity of the SAC. It would also have to outline how 2 fish wouldn't have a negative impact on the SAC integrity as opposed to 4 fish..? No you haven't got it. What the hell do you think your doing to our SAC lough corrib, who gave you the authority to decide to apply, ideas, opinions, and suggestions from fairy land to maintain our SAC to it's proper requirements to up hold its integrity for it's native Salmonids. The Bull.... is over and we'll you know it, lies, lies and more lies to me, my family and to my face. I hope you have a good look at what you've done to our beautiful lake lough corrib SAC by your complete betrayal to our lake, it's a very serious environmental crime when you decided to ignore the law. I am a indigenous riparian stakeholder, my 2 sons are 5th generation on the lake, do you think I'll allow IFI and the mismanagement of our lough corrib go down the weir.! WELL SEE YOU IN COURT and Wear something nice the judge will like on you.</p>	13/09/2023	14/09/2023
PC124	Object to the draft bye-law	<p>I completely disagree with the proposed bylaw for the reduction of the bag limit from 4 to 2 on the Clare River. This just means that the Inland Fisheries are throwing in the towel on protecting trout. You state that you use scientific evidence as a basis for your activity – what evidence exists to back up this by-law?</p> <p>Do you know how much fish anglers catch on a regular basis? How will you know that this by-law will ever make a difference? This makes no sense.</p>	13/09/2023	14/09/2023
PC125	Object to the draft bye-law	<p>I disagree with this bylaw to reduce the bag limit to 2 on the Clare river. For starters, how will an IFI officer be able to distinguish where an angler actually caught fish the trout? E.g if an angler caught 1 trout on the lake and 2 in the Clare river. Unless it was witnessed, how could this be proven? Having two different catch limits on the same system would not be enforceable in the long term. The IFI invests significant amount of finance into scientific research. Please produce the scientific research that demonstrates a link between reducing the bag limit and the long term protection of trout.If there is a concern about the number of fish taken from the Clare river, would it not make more sense to patrol it more?</p>	13/09/2023	14/09/2023
PC126	bye-law should provide additional measures aswell	<p>The National Anglers Representative Association (NARA) would like to make the following points in relation to the above proposed Bye Law. NARA supports all efforts by clubs and IFI to conserve wild brown trout. NARA supports the concept of bag limits as a conservation measure. NARA recognises that the majority of anglers use self imposed limits when it comes to the taking of wild trout. NARA recognises that a statutory bag limit supports anglers and clubs in maintaining wild trout numbers at sustainable levels. NARA supports the concept of allowing anglers to take a trout for the table within the limits of conservation. NARA submit that wild trout fisheries should be managed so that the taking of a trout for the table should not impact on the sustainability of the fishery. NARA believes that the bye law as proposed does not go far enough and will not achieve the desired impact on wild trout within the Corrib catchment. NARA submits that the bye law should be catchment wide including all of Lough Corrib and its tributaries. This is in line with NARA policy that wild trout fisheries should be managed as an entire entity with the view of sustaining suitable habitat for wild trout and salmon. The rivers covered by the proposed byelaw are vital to spawning fish, both wild trout and Atlantic salmon as are the other rivers within the Corrib system. Atlantic salmon are recognised as being in serious decline throughout Ireland. It is also clear that wild trout populations are under pressure due to deteriorating water quality and degradation of spawning habitats. NARA submit that all angling should be prohibited between the 1st October to the 15th of February on these important spawning habitats within the Corrib system and on the Lough itself. This measure is proposed in order to protect spawning trout and salmon. NARA's submit that these changes should be included in this final bye law.</p>	13/09/2023	14/09/2023
PC127	Object to the draft bye-law	<p>What Legal basis has this bye-law?There is clearly way more important dangers and Threats to our Lakes and Rivers-Water Quality,Pollution - proper Sewerage systems , controlled farms near the lake on, To name a few,River management ,Spawning Beds properly managed for Salmonid, Invasive Fish Species Controlled (Carp found on Lough Corrib). No scientific research to say catch and release is effective as stated above clearly bigger and lot more important issues to address. The Benefits of these would far outweigh a bag limit. I am pleading to You , this is your chance to save our Beautiful rivers and lakes,Please think about this , they are Gifts from God and it is our responsibility to hand them over to the next Generation in the best possible condition we can. Please think about this.</p>	13/09/2023	14/09/2023
PC128	In favour of the draft bye-law	<p>Agree with the proposal to reduce the daily bag limit of four brown trout to two brown trout on the Rivers Clare, Abbert, Dalgan, Grange and Sinking in the Galway Fishery District. I hope it's a majority vote.</p>	13/09/2023	14/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC129	Object to the draft bye-law	I wish to object to any decrease in bag limits on the Clare River as I do not believe that it is Science based and appears to blame Anglers for an apparent reduction in Trout numbers even though there is no Scientific proof for this so it would appear that it is based on hearsay from Anglers who really don't know what the stocks are like. Basically I would like to see management that is based on Science and conforms to the Habitats Directive and also more control of pollution.	13/09/2023	14/09/2023
PC130	Object to the draft bye-law	1. There is no Science behind such a move. 2. No proof that Rod and Line fishing affects the overall stock. 3. It will not address problems associated with Poaching, Degradation of Steams and Pollution which are affecting the production of Fry. 4. It is purely based on Human sentiment and has nothing to do with Conservation. 5. The implementation of these measures will spell the end of Trout Fishing and turn Fishing into nothing more than a blood sport allowing it to come under attack from animal rights activists. 6. Research shows that up to 40% of fish caught and released die within 24 hours. Inland Fisheries must conform to the Habitats Directive and put proper Conservation at the top of their agenda, pandering to sections of Angling does nothing for the future of the Salmonid Species, proper management of pollution, streams and enforcement is the only way.	13/09/2023	14/09/2023
PC131	In favour of the draft bye-law	As a keen and active member of angling clubs along the shannon catchment along with membership with a number of angling clubs on Loughs Corrib & Lough Mask I feel that this measure will in no doubt help with the conservation of our native salmonid species of brown trout & salmon. Our clubs along the shannon catchment have introduced this conservation measure to our catchments for a number of years now and is helping to sustain salmonid populations in these rivers and lakes to a certain extent. I would like to add that anglers are willing to support with measures like this but some much larger threats to our salmonid populations exist outside the control of rod & line anglers. I really hope that IFI & the government will implement the required actions needed to improve the water in our streams, rivers and lakes with urgent work required in this area of protecting the spawning areas of these river catchments from severely increased intensive agricultural practices.	13/09/2023	14/09/2023
PC132	Object to the draft bye-law	<p>Oughterard Anglers and Boatman's Association totally reject the proposed reduction in Bag limits on the Clare River.</p> <p>The Proposed reduction in Bag Limits on the Clare River and its Tributaries, is clearly based on Angler sentiment and has no Scientific base or Evidence supporting the move, when a four fish bag limit was introduced it covered the entire catchment all lakes and tributaries flowing into the Corrib system and its distributaries at Galway, so it begs the question WHY are IFI introducing this Bye Law which undermines the proposed Western Lakes Plan and ignores the vast majority of submissions which were received by them, which demanded proper Science based management i.e. Pollution control, Stream management, Predator control , Invasive weed and fish management. The plan did not provide for additional Staff to properly manage the above, a two Trout Limit is in place in the Midland and Shannon Fisheries, Bye Law No. 949 of 2017 with what result? These Lakes are now mixed fisheries and no Bye Law of this Nature will help the Salmonid Population in Corrib or any other Lake against the onslaught of illegally introduced species but will be used yet again by the State through IFI to reduce investment in our Trout and Salmon Fisheries. The Bye Law will in no way address the unscrupulous people who Net or Kill bags of Trout on the Clare system (Hearsay) it will catch the concerned Angler who are invested in their River and who already have a two Trout policy in place through their Club, it will not change the fact that much of this is a Fisheries Policing issue and a Pollution and Development issue none of which IFI are able to address due to a lack of willingness to continue to manage these Fisheries as Wild Brown Trout Fisheries; and underfunding by the State in spite of its obligations under European and Irish Law, this Fishery is a Special Area of Conservation and has the ability to sustain the present Harvest Levels with proper management. The practice of catch and release as a fisheries management tool to reduce fishing mortality is proposed for the Clare River because of a shift in the attitude of some anglers related to fish harvesting.</p> <p>Cumulative fish mortality rates occur from: -</p> <ul style="list-style-type: none"> • Mortality due to harvesting • Mortality due to catch and release • Natural mortality • Mortality due to predation from introduced Predators. • Mortality due to external factors, Water Pollution, Poaching, introduced species etc. <p>The shift towards catch and release angling is driven by an assumption that catch and release angling will benefit the stock and will result in much lower total mortality rate than would otherwise occur. This is a flawed assumption and catch and release angling is likely to conflict with the perceived goals. Should this proposal be implemented, it is likely that the total annual harvest per angler will be maintained as anglers increase the number of fishing trips to compensate for reduced daily harvest limits i.e., mortality due to harvesting is unlikely to reduce (Bartholomew and Bohnsack, 2005). The common occurrence of fish mortality due to fish disturbance and fish injury will increase i.e., fish mortality rates due to catch and release angling will increase. An increased emphasis on catch and release angling, as a means of preserving fish stocks, requires careful consideration.</p> <p>Angling by rod and line serves two purposes: -</p> <ol style="list-style-type: none"> 1. To harvest fish for consumption. 2. To satisfy the anglers' psychological desire to hunt and catch fish. <p>Whilst the welfare issues associated with catch and release angling are not fully understood, it is widely accepted that catch and release angling increases fishing-induced stress, injury, and mortality. It is not difficult to understand why animal welfare activists object to catch and release angling. Angling by rod and line to merely "satisfy the anglers' psychological desire to hunt and catch fish" cannot be morally justified.</p> <p>The proposal to reduce harvest numbers in favor of catch and release angling will not benefit fish stocks; it will threaten the future of recreational angling.--</p>	13/09/2023	14/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC133	Object to the draft bye-law	<p>I object to reduction in the trout bag limit on the Clare system for the following. In introducing any changes to legislation one must be conscious of the reasoning for such change and question why is it necessary. Is it failure of I.F.I. to implement current legislation or is there a genuine need for change to a 2 bag limit per day, seeing that most anglers fishing the system are voluntarily doing just that. Could it be angler sentiment at play! Has the trout population dropped to such an extent that it is merited? What action has I.F.I. taken to control predators i.e. pike, perch, mink, poaching, cormorants etc. that predate on fish stocks. These are all questions that need to be addressed before any changes are sought to bag limits or legislation. To suggest that rod and line has a major impact on fish stocks and will solve all the ills that affect Clare system is pure lunacy and only demonstrates the ineptitude of those in charge and its management. Bag limits never solved any problems linked to fish decline. A classic example is the story of the sea trout in Connemara where C&R was introduced decades ago to no avail and the main cause of their decline ignored to this day. Surely I.F.I. must realize this from their own modeling, surveys and studies. Crucial to this debate is the scientific evidence to support bag limits, does this science exist ? To my knowledge there is none. So why persist with a flawed concept ? Secondly, until such time as I.F.I. can clearly identify the amount of trout taken by predators can a proper discussion take place on bag limits. Back in the 1950's Toner was able to calculate that 250,000 trout were consumed by pike annually. Today this number must be multiples of that figure.The abject failure of I.F.I. over the past twenty years in terms of stream enhancement, protection, pollution, predator control, water quality and the lack of any real direction in the management of the Great Western Lakes has contributed more to stock decline than any other factor. Deflecting the problem to rod and line anglers only proves the point. The Habitat's Directive and Water Framework Directive have been totally ignored as if they never existed.Unfortunately the vast majority of anglers have lost trust and confidence in I.F.I. as an organization and can no longer be entrusted with the management and well being of our Great Western Lakes. This legislation is a precursor for the lake itself and will not be tolerated.</p>	13/09/2023	14/09/2023
PC134	In favour of the draft bye-law	<p>As a frequent visitor to this area to fish over the last 20 years I fully support the motion to reduce the daily bag limit to 2 fish. In this day and age, anglers no longer rely on fish as a source of food and in the face of declining fish stocks I can see no justification in anglers continuing to take 4 fish</p>	13/09/2023	14/09/2023
PC135	Object to the draft bye-law	<p>My name is [REDACTED] I was born in [REDACTED] was raised and live and have lived most of my life on [REDACTED] where I've taken an active interest in protecting its environs and native species, fishing its full extents, tributaries, mountain lakes etc and as such, I would therefore like to be considered a key stakeholder in relation to the above plan and the public consultation element.The attached draft Galway district conservation of trout in the rivers clare abbert dalgan grange and sinking bye law-no.-xxx-2023- where it sets out to reduce the bag limit from 4# trout to 2# trout, has no basis in scientific or evidential studies to support the rational for drafting this bye law. As it noted in WFD surveys of the Clare River 2019 and RPS studies on the Clare River flood relief scheme, pike are found the whole way through the river up to and passed Tuam. Large Pike have been noted to have been caught above Tuam itself. This range of the pike is likely a result of the Corrib main drainage scheme undertaken some 60 or so years ago, and has made large extent of the Clare River catchment into a slow flowing, deep, dark body of water, allowing sediment to build up and weed growth to strengthen (also affected by agricultural sources of pollution) which in turn has made it an ideal environment for the spread of the pike and the corresponding drop in trout pollution. There is a bag limit on the Corrib system of 4# trout, and I can testify that it has been 20 years or more since I have caught 4 trout in one day, let alone catch 2 trout with a combined weight of more than 10lbs. The majority of anglers do not exceed or are even remotely lucky enough to exceed the 4# trout bag limit, and any further reduction in bag limit on the Clare River will be a pointless exercise in trout stocks preservation with no scientific rational or IFI studies or surveys to back this up. As a result, it begs the question WHY are IFI introducing this Bye Law which undermines the proposed Western Lakes Plan and ignores the vast majority of submissions which were received by them, which demanded proper Science based management i.e. Pollution control, Stream management, Predator, Invasive weed and proper fish management. The plan does not provide for additional Staff to properly manage the above, and a two Trout Limit; which is in place in the Midland and Shannon Fisheries, Bye Law No. 949 of 2017 has shown no benefit to these systems. These Lakes are now mixed fisheries and the proposed Bye Law of this Nature will NOT help the Salmonid population in the Clare catchment or in the Corrib or any other Lake against the onslaught of illegally introduced species but will be used yet again by the State through IFI to reduce investment in our Trout and Salmon Fisheries. The practice of catch and release as a fisheries management tool to reduce fishing mortality is proposed for the Clare River because of a shift in the attitude of some anglers related to fish harvesting.</p> <p>Cumulative fish mortality rates occur from: -• Mortality due to harvesting• Mortality due to catch and release• Natural mortality• Mortality due to predation from introduced Predators.• Mortality due to external factors, Water Pollution, Poaching, introduced species etc.The shift towards catch and release angling is driven by an assumption that catch and release angling will benefit the stock and will result in much lower total mortality rate than would otherwise occur. This is a flawed assumption and catch and release angling is likely to conflict with the perceived goals. Should this proposal be implemented, it is likely that the total annual harvest per angler will be maintained as anglers increase the number of fishing trips to compensate for reduced daily harvest limits i.e., mortality due to harvesting is unlikely to reduce (Bartholomew and Bohnsack, 2005). The common occurrence of fish mortality due to fish disturbance and fish injury will increase i.e., fish mortality rates due to catch and release angling will increase. An increased emphasis on catch and release angling, as a means of preserving fish stocks, requires careful consideration.Catch and release angling affects are not fully understood, but it is widely accepted that catch and release angling increases fishing-induced stress, injury, and mortality.</p>	14/09/2023	14/09/2023
PC136	In favour of the draft bye-law	<p>I would like to introduce myself as an angler, [REDACTED] and someone who has over 40 years experience fishing the Clare river. Over the last 10 years I have seen a considerable decline in the numbers of trout being caught nationally on our wild trout fisheries and the Clare river follows this trend. Many reasons can be given for this decline. For instance,water quality,predation,poor habitat,over cropping,climate change are all concerns associated with our wild trout fisheries. There is no quick fix but we can help change things for the better. Conservation measures are necessary to help improve and sustain our wild brown trout fisheries. I believe that bag limits as a conservation measure are necessary in protecting the sustainability of wild fisheries. The Clare river is unique as many of its trout migrate from Lough Corrib during early summer and rest in the river until they run one of the tributaries later in the season to spawn. These fish need protection and a two fish limit will help protect numbers on the Clare river and its tributaries.</p>	14/09/2023	14/09/2023
PC137	In favour of the draft bye-law	<p>I have read the consultation piece on reducing the bag limit to 2 trout on the Clare river and it's tributaries , my name is [REDACTED] tuam anglers association. At this years agm we passed a motion to reduce the bag limit to 1 fish. I would be in favour of your proposal to reduce the bag limit on these rivers to 2 fish. Most of our anglers are catch and release and I am hoping that all our competitions could be turned to c&r next year.</p>	14/09/2023	14/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC138	Object to the draft bye-law	The answers to the following questions should be available before any such proposal is considered: •how many trout are caught on the clare river system per annum. As we've seen with introducing bag limits and/or 100% catch and release in the case of Connemara sea trout, neither work unless the root causes of population decline are identified and actioned. Let me make 2 proposals. 1. Firstly, restoration of spawning habitat must be accelerated to return to what it was 20/30 years ago and then maintained annually. There are miles of potential spawning redds overgrown with weeds, silted up, blocked, polluted, etc that could exponentially improve the trout population.2. Predation control - there are 3 elements to this:• Cormorants are now a major issue on lough corrib (in excess of 100 birds and increasing) and the clare river, with sightings further upstream on the tributaries year on y Each of these voracious feeders consumes an average 1.5lb of fish per day - EVERY day of the year. Conservatively, they predate on >100,000 fish each year which makes a mockery of the proposed bye law reducing the bag limit for a small (but unknown) number of anglers from 4 to 2. I drove from Oughterard to Lime Island one morning last year and counted 37 cormorants resting on the markers/rocks in that hour, it's not uncommon now to see flocks of >15 birds flying above the lake. Reduce the number of cormorants immediately.• Mink are an invasive species and are having a detrimental effect on fish and ground nesting birds all over the country. Where is the plan to completely eliminate mink from our countryside? Again, leaving this species uncontrolled makes a mockery of reducing bag limits and is akin to 'head in the sand' strategy.• Pike are another invasive species doing huge damage on the clare system as they are now to be found in strong numbers throughout the entire system predated on the trout that travel to the spawning areas intent on carrying on the circle of life that they have done uninhibited for years until mink, pike and habitat destruction are preventing them from doing so. Pike need to be removed from the upper reaches of the Clare system and managed on the lake to prevent re-colonisation in the future. • what is the breakdown per month • what has been the impact of clare river system rod caught trout on the general trout population in the clare/corrib system in the last 5/10/15/20 years • what will this proposal do the general trout population in clare/corrib river system in the coming years	14/09/2023	14/09/2023
PC139	In favour of the draft bye-law	1. On behalf of the WildFish, I am responding to IFI Galway District's consultation on the Conservation of Trout in the Rivers Clare, Abbert, Dalgan, Grange and Sinking, Bye-law No. XXX 2023 – 10.08.2023 (4022). 2. WildFish is a charity that works in the UK and Ireland to protect Wildfish and their habitats. We were founded in 1903 and have a long and distinguished history in fish and fishery conservation. Where there is pressure on wild fish stocks we advocate a reduction in fishing pressure including catch and release. 3. Whilst quantitative data are lacking, we are aware there is widespread concern amongst the angling community, its representative bodies (e.g. Cairde na Chláir) and IFI about the status of the brown trout populations (and r catches) of the Corrib. The causes are no doubt many, but catch and kill by anglers is clearly part of the issue. Numerous studies from across the world attest to the impact that unrestrained catch and kill angling can have on the productivity and sustainability of trout populations, with fisheries moving towards catch and release often realising rapid improvements in angling quality. 5. WildFish supports the bye-law proposal at least to halve the current Clare bag limit. We would suggest that a maximum size for a takeable fish be set at 3lbs (c1.36kg) to protect large female fish.From an enforcement viewpoint, a daily limit of 2 fish, neither heavier than 3lbs, is a simple measure to evaluate on the bank and a more than sufficient take for the table.	14/09/2023	14/09/2023
PC140	In favour of the draft bye-law	As an angler who enjoys visiting the west of Ireland and fishing for wild trout, I write in support of the new byelaw proposed by Inland Fisheries Ireland to reduce the daily bag limit of four brown trout to two brown trout on the Rivers Clare, Abbert, Dalgan, Grange and Sinking in the Galway Fishery District. I applaud this initiative to conserve stocks of wild brown trout and hope it is just the beginning in this respect.	14/09/2023	14/09/2023
PC141	In favour of the draft bye-law	I write in support of the proposed new bye law reducing the bag limit from 4 fish to 2 fish for the Clare river and the associated rivers in the catchment area which are subject to this proposed new by law	14/09/2023	14/09/2023
PC142	In favour of the draft bye-law	I would like to submit my views regarding the proposed bag limit reduction for brown trout within the Clare River Catchment. I support this reduction proposal from 4 fish to 2 fish. Protection of wild brown trout from all types of predation is important going forward. This reduction in some way will show that anglers are prepared to play their part. Wild native brown trout require protection and assistance. More needs to be done in addition regarding other types and forms of predation also both native and alien which affect trout and salmonoid stocks in the Clare river Catchment. IFI needs to play a more supportive role in this field and more needs to be done to protect, enhance and improve salmonoid numbers and habitat protection and preservation.	14/09/2023	14/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC143	In favour of the draft bye-law	<p>We would like to submit regarding the proposed bag limit reduction for brown trout within the Clare River Catchment. Our association supports this reduction proposal from 4 trout to 2 trout per angler per day.</p> <p>We believe that killing 2 wild brown trout per day is more than sufficient for any bona fide angler. Protection of wild brown trout from all types of predation and harm is important going forward.</p> <p>This reduction will show that anglers are prepared to play their part. Wild native brown trout require more protection and assistance than ever before.</p> <p>More needs to be done by the State appointed organisation concerning and regarding other types and forms of predation also both native and alien which affect trout and salmonoid stocks in the Clare river Catchment.</p> <p>IFI needs to play a more Hands on and supportive role in this field and more needs to be done to protect, enhance and improve salmonoid numbers in the system and also habitat protection and preservation of water quality. Wild native brown trout require more protection and assistance than ever before. More needs to be done by the State appointed organisation concerning and regarding other types and forms of predation also both native and alien which affect trout and salmonoid stocks in the Clare river Catchment.</p>	14/09/2023	14/09/2023
PC144	Object to the draft bye-law	<p>1.0 THE CLARE RIVER SYSTEM The Clare River catchment is located within the Lough Corrib Special Area of Conservation (SAC) and covers an area of approximately 900km² (FIGURE 1 & APPENDIX I). The Clare is the longest river in the Lough Corrib catchment at 93km. The Clare River rises north of Ballyhaunis in Co. Mayo and flows in a south westerly direction before entering Lower Lough Corrib approximately seven kilometres west of Claregalway. The main tributaries are the Abbert, Dalgan, Grange, Nanny and Sinking rivers. The catchment's geology is mostly limestone and shale while agriculture is the main land use. The catchment has been subject to on-going arterial drainage since the 1950s. This has included re-alignment and widening of the channel together with lowering of the bed to reduce over-bank flooding. Despite this physical pressure on fish habitat, the river is known to produce large salmon and trout.</p> <p>2.0 THE PROPOSED BROWN TROUT BAG LIMIT BYE-LAW Inland Fisheries Ireland (IFI) has proposed to reduce the daily bag limit of four brown trout to two brown trout on the Rivers Clare, Abbert, Dalgan, Grange and Sinking in the Galway Fishery District. The current daily bag limit of four brown trout for these rivers is currently legislated for under the Western Fisheries Region Conservation of Trout Bye-Law (840) 2008, which covers the entirety of Lough Corrib SAC. If the proposed legislation is signed off by the incumbent Government Minister in the near future, then there will be two separate bye-laws regulating the harvest of brown trout on Lough Corrib SAC. This will have serious implications for the policing, enforcement and legitimacy of the proposed legislation under the EU Habitats Directive. These issues will be discussed further.</p> <p>3.0 THE NECESSITY OF THE PROPOSED BYE-LAW On Tuesday August 15th this year, IFI issued a press release regarding this proposed byelaw and its public consultation. At the same time, IFI didn't publish any accompanying appropriate assessment screening, scientific report, stock survey or angling catch reports with data that would qualify and quantify why a brown trout bag limit reduction would be warranted on the Clare River system. The last fish survey report available in the public domain for the Clare River was published on July 28th 2020 by IFI (APPENDIX II). IFI stated that a total of thirty eight sites were surveyed on the Clare River catchment between July 1st and July 19th 2019 to determine the status of its fish stocks. IFI stated the following in their summary, "A Water Framework Directive fish classification tool (FCS2) was developed for Irish rivers in 2011. The tool works by comparing various fish community metric values within a site to those predicted for a site under unimpacted conditions. Fish ecological status was assigned to 37 of the 38 sites surveyed in the Clare River catchment during 2019. Seventeen sites achieved Good fish status; however only one site was assigned High Status. The remaining sites were assigned a status of moderate (ten sites), bad (seven sites) and poor (two sites). There was evidence of nutrient enrichment and other pressures throughout the catchment, particularly in the Dalgan and Sinking River catchments. Overall the Grange and Abbert Rivers had the highest percentage of Good status sites; however there were also indications of localised pressures present in these subcatchments".² Nowhere in this report did IFI state that brown trout angling is a negative anthropogenic pressure on the river system. If brown trout angling is not a negative pressure on this section of Lough Corrib SAC then why are IFI and known IFI sycophants based on the east side of Lough Corrib pushing for this unnecessary and misleading byelaw? Furthermore in a 2012 IFI preliminary report on adult fish stocks in Lough Corrib, Drs Delanty and O'Grady made the following statement: "If excessive angling catches were responsible for reducing trout stocks in recent years then a significant reduction should be seen in the numbers of larger older fish in the 2012 survey – this is not the case. It is the smaller fish, not the larger individuals, which are poorly represented in the stock".³</p> <p>4.0 THE RUSE OF BROWN TROUT CONSERVATION It is pretty evident for the last twenty odd years that there has been a covert state policy to undermine and diminish our wild salmonid fisheries even in the face of growing EU legislation (EU Habitats and Water Framework Directives) that is designed to protect the same fisheries and their integrity. Part of this covert policy is to frame the game (salmonid) angler as being the greatest threat to conservation whilst deliberately ignoring political bombs in respect of agricultural pressures on water quality plus the wanton spread of non-native/invasive fish and their subsequent legislative conservation. It's so easy for IFI and the Department of the Environment, Climate and Communications (DECC) to spin this narrative of the 'neanderthal/anti-conservation' game angler particularly on social media platforms where so many willing vacuous cheerleaders exist from Irish pike/coarse angling lobby groups and supported by their international lackeys. This proposed bye-law is further proof that the IFI SMT (Senior Management Team) are unwilling and afraid to deal with the substantive issues of water quality and non-native/invasive fish within the Clare River system but instead are succumbing to irrelevant societal pressures and a form of pseudo-morality vis-à-vis fish harvesting. Essentially, this proposed bye-law is another blatant two fingers to Lough Corrib SAC riparian stakeholders particularly when so many submissions from the same stakeholders were completely ignored during the Western Lakes Management Plan consultation this year</p>	14/09/2023	14/09/2023 & 02/11/2023

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PC144		<p>5.0 THE LEGALITY OF THE PROPOSED BYE-LAW</p> <p>On July 5th this year in response to a parliamentary question tabled by Noel Grealish TD regarding the Western Fisheries Region Conservation of Trout Bye-Law (840) 2008, Minister Eamon Ryan made the following remarks: “The Bye-Law relates to the conservation of trout which is not listed by the National Parks and Wildlife Service (NPWS) as a qualifying interest fish species under relevant legislation (S.I. 477 of 2011). Notwithstanding this, as part of the current review, subject to the technical and scientific inputs of IFI and relevant legal advice, a screening for appropriate assessment will be carried out of any revised Bye-Law in the context of the Habitats Directive. The existing Bye-law No. 840, 2008 was recommended to the Department by the then Western Regional Fisheries Board (WRFB) following a comprehensive public consultation process”. For this particular public consultation, IFI have failed to produce any appropriate assessment screening as indicated by Minister Eamon Ryan for this proposed bye-law. If no screening is produced, then the proposed bye-law will be in direct conflict with Articles 6.3 and 6.4 of the EU Habitats Directive thus making it legally inadmissible. Therefore, IFI and DECC will not be in a position to defend the bye-law when challenged in front of the High Court resulting in a similar debacle to the complete non-defence of the Designated Salmonid Waters Bye-Law (964) 2018 in February 2019, where the legal team representing the Irish State failed to produce any screening for the now revoked bye-law.</p> <p>As it stands, the current Western Fisheries Region Conservation of Trout Bye-Law (840) 2008 is also legally inadmissible. Lough Corrib SAC stakeholders have ascertained through legally binding Freedom of Information (FOI) requests and Access to Information on the Environment (AIE) requests that no appropriate assessment screening was conducted on the 2008 legislation. However, the foreword of the said bye-law states clearly that the Minister (Eamon Ryan), “complied with the requirements of Regulation 31 of the European Communities (Natural Habitats) Regulations 1997 (S.I. No. 94 of 1997”. Regulation 31 refers to the appropriate assessment process but admissible evidence to hand clearly shows that this statement within the 2008 legislation is a falsehood. As the Western Fisheries Region Conservation of Trout Bye-Law (840) 2008 is the parent bye-law to the proposed Clare River system legislation, it further weakens its legal provenance if the proposed bye-law appears on the Irish Statute Book, then two conflicting stock management regimes will exist for brown trout on the same SAC. Having two different brown trout management regimes may be applicable if the brown trout of the Clare River system were genetically distinct from their Lough Corrib brethren. A 2012 Lough Corrib Fish Stock Survey Report published by IFI in 2014 indicated that “78% of the adult fish in L. Corrib in March 2012 were from one of five sub-catchments – Abbert (23%), Grange (21%), Bealnabrack and Cornamona (19%) and the Oughterard River (15%)”.</p> <p>The report further indicated that “in the case of both the Grange and Abbert stocks most adult trout from these rivers were found in the lower Corrib basin”. This 2012 genetic analysis clearly shows that the brown trout stocks of Lower Lough Corrib are genetically homogenous with those of the Abbert and Grange Rivers within the Greater Clare River system. Therefore, it could be argued that having two different and fragmented management regimes for a fish species with the same genotype residing in the same SAC is completely at odds with the concept of ‘ecological integrity’ laid down within the EU Habitats Directive. This adds even further legal vulnerability to the proposed bye-law. Atlantic salmon in Lough Corrib are governed under a single stock management regime throughout the entire SAC and adjacent hydrologically linked SACs, which is underpinned by an annual appropriate assessment screening</p>		

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PC144		<p>6.0 THE POLICING OF THE PROPOSED BYE-LAW If it comes to fruition that two different brown trout bag limits exist on Lough Corrib SAC for the year 2024, how will IFI enforcement officers police this legal duality without penalising or attempting to prosecute innocent parties? Let us examine some scenarios that may play out come February 15th 2024.</p> <p>6.1 Scenario I A lone angler sets out on the opening day of the Lough Corrib brown trout season to troll brickeens (minnow - Phoxinus phoxinus) around the Lower Lake. The angler trolls two rods and by lunchtime has landed and kept four brown trout as per his/her legal entitlement under current legislation. Due to inclement weather, the angler has decided to seek shelter in the Clare River where one can land safely on the river bank and have lunch. Whilst enjoying their tea and sandwiches, the lone angler is approached by a warranted IFI officer who cautions the said angler and searches their boat. The IFI officer finds four brown trout in the boat and declares that they've been caught in the Clare River. The lone angler protests his/her innocence and declares that the fish have been caught on the lake and not in the river. The IFI officer ignores the pleadings of the lone angler and issues a fixed charge penalty notice for infringement of the Galway District - Conservation of Trout in the Rivers Clare etc Bye-Law. More than likely, the lone angler will have his/her rods, tackle and catch confiscated too. The end result is that we now have an innocent angler being victimised, financially penalised and potentially criminalised because they sought shelter in the Clare River, which is a common practice for many who fish Lower Lough Corrib during springtime. What have IFI and their overzealous enforcement officer achieved? More negative PR with ever growing animosity between IFI staff and Corrib anglers, driving a wedge further between riparian stakeholders and the statutory body and killing off any goodwill that may still exist with Lough Corrib anglers towards IFI.</p> <p>6.2 Scenario II A lone angler sets out from the Commercial Club in Woodquay on the opening day of the Lough Corrib brown trout season to troll the Clare River for Atlantic salmon. The Clare River is well known to have a run of spring salmon every year. The lone angler in question holds a valid 2024 salmon licence and the requisite but questionable Clare River permit. In the course of trolling the Clare River, the said angler catches and retains one fresh springer that is tagged correctly and also lands and retains two brown trout as bycatch. After lunch the angler departs the Clare River to fish the open lake for brown trout. Before the day comes to a close, the lone angler lands and retains a further four brown trout fishing close to Fly Island and the Moycullen shore. The angler in question has now landed seven fish under the following legislation. One Atlantic salmon under the forthcoming 2023 Conservation of Salmon and Sea Trout (Bag Limits) Bye-law, two brown trout under the proposed Galway District - Conservation of Trout in the Rivers Clare etc Bye-Law and a further four brown trout under the current Western Fisheries Region Conservation of Trout Bye-Law (840) 2008. The angler has complied with all the relevant legislation and is in a legally watertight position if challenged by IFI enforcement staff considering the drafting of all three bye-laws. The unintended consequence of this illconceived and knee-jerk Clare River system legislation is that IFI through their administrative incompetence would increase the brown trout bag limit from four fish to six fish on Lough Corrib SAC. Are IFI happy to push through this '4+2' idiocy and claim a conservation win for brown trout through mass/social media puff pieces?</p> <p>6.3 Scenario III A lone angler sets out to fish the Clare and Cregg Rivers from the bank for salmon and brown trout on February 15th 2024. The angler parks his vehicle close to the Curraghline (N84) on a bog road between the two rivers. The angler is also in possession of the requisite paperwork to fish for Atlantic salmon along the Clare River (Claregalway Castle Fishery). Initially, the angler decides to fish for brown trout along the Cregg River where he/she lands and retains four fish within the legislative criteria. After a few hours, the said angler leaves the Cregg River and walks south towards the Clare River to fish for Atlantic salmon. Within a few minutes of arriving at the Clare River, the angler is challenged by an IFI enforcement officer. The IFI officer finds four brown trout in the possession of the angler and forms the opinion that they have been taken from the Clare River. The lone angler protests his/her innocence and declares that the fish have been caught on the Cregg and not the Clare River. The IFI officer ignores the pleadings of the lone angler and issues a fixed charge penalty notice for infringement of the Galway District - Conservation of Trout in the Rivers Clare etc Bye-Law. The angler also has his/her rod, tackle and catch confiscated. The angler protests even further and the malevolent IFI officer threatens to confiscate the angler's vehicle as tempers flare. The end result is another self inflicted fiasco by IFI with further reputational damage for an inept organisation.</p>		

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PC144		<p>7.0 FAIT ACCOMPLI On Monday August 14th this year, a day before IFI issued a press release regarding the commencement of a public consultation on this proposed Clare River system legislation, certain individuals based on the east shore of Lough Corrib who can only be described as IFI flunkies leaked a copy of the proposed legislation through mobile messaging apps. The draft being circulated on this date clearly showed a printed signing off date of December 2023 (APPENDIX III). Was this a simple typo in the draft paperwork or something more sinister and underhand? Considering the attitudes and behaviour of IFI staff that have been exposed in front of the Dáil Public Accounts Committee by elected public representatives this summer, it can be rightfully assumed that this December 2023 signing off date was intended and deliberate. Additionally, it makes a complete mockery of the public consultation process as irrespective of submissions received, IFI have the intention of pushing through this impotent bye-law come hell or high water. Ironically, when IFI finally published the draft bye-law through official channels on August 15th this year, the reference to the December 2023 signing off date was conveniently removed (APPENDIX IV).</p> <p>8.0 SUMMARY IFI haven't published in the public domain any scientific evidence/data or an appropriate assessment screening that warrants this proposed bye-law. The perceived angling pressure on brown trout in the Clare River system is a complete red herring. If IFI truly believe that angling pressure is a major factor influencing brown trout conservation in the west of Ireland then why are IFI happy to still have an unlimited brown trout rod catch on Loughs Conn and Cullin in Co. Mayo under the North Western Fisheries Region - Lough Conn and Lough Cullin (Conservation of Brown Trout) Bye-Law (827) 2007. Both lakes are part of the River Moy SAC. Moreover, IFI see no duplicity or inconsistency in allowing an angler to harvest four brown trout of the same genotype on Lough Corrib but only two brown trout of the exact same genotype in an adjoining tributary. Even more bizarrely, an angler could fish the Cregg River (another Lough Corrib tributary) that is approximately 2kms from the Clare River and still harvest four brown trout under this asinine proposal. IFI always want to solve problems that they don't have but never the problems they do have. It would be far more prudent of IFI and DECC in terms of salmonid conservation to cease protecting non-native/invasive fish in Lough Corrib SAC and particularly in the Clare River. Current fisheries legislation such as the 806 and 809 Bye-Laws of 2006 protecting pike and other non-native/invasive freshwater fish must not conflict with or contravene the conservation objectives of the EU Habitats and Water Framework Directives. The bizarre situation whereby invasive coarse fish such as pike, roach, perch, bream, carp, tench, dace, chub, various hybrids etc being protected in salmonid/SAC fisheries must end. Is it morally acceptable that invasive pike or newly introduced Lough Corrib carp4, which are classed as non-native5 to Ireland under the EU Water Framework Directive (WFD) have more protection under current questionable legislation than our native Atlantic salmon? Please note that it is perfectly 'legal' for an angler to harvest a 30lb wild Atlantic salmon if in possession of a valid salmon licence but a 30lb invasive pike or invasive carp are untouchable under 'law'. The 806 and 809 Bye-Laws as currently worded also validate the presence of invasive coarse fish no matter where they have been deliberately introduced or will be introduced in the future including all lacustrine/riverine SACs. The 806 and 809 Bye-Laws are illegal and must be revoked. The current IFI CEO is perfectly aware of the situation and IFI stated such in a 2021 submission to its parent government department (DECC). Not alone are the 806 and 809 Bye-Laws repugnant to current Irish and EU legislation but they were formulated in 2006 without any legally required screenings on the basis of perceived threats, false facts and latent racism towards Eastern Europeans by pike/coarse angling lobbyists.6 How could IFI in the most hypocritical manner attempt to reduce the brown trout bag limit on the Clare River system while continually ignoring the ecological damage that invasive pike and invasive coarse fish cause in salmonid systems including the Clare River itself? Water bodies with non-native/invasive coarse fish species such as pike will not meet high status for WFD purposes due to the presence of these species. Future introductions of non-native/invasive fish species will also lead to a downgrading of the ecological status of a water body under the WFD. Stricter border controls especially in the post Brexit era and strengthening of existing legislation for moving these species internally in Ireland is required immediately. Legislation currently exists under Regulation 49 (Prohibition on introduction and dispersal of certain species) of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477). We are calling on DECC/IFI to add all nonnative/invasive coarse fish (covered by the 806 & 809 Bye-Laws) including zander (Sander lucioperca), barbel (Barbus barbus), wels catfish (Silurus glanis) and topmouth gudgeon (Pseudorasbora parva) to the Third Schedule (Part 2A) of S.I. 477, which already lists chub, dace, roach and carp. No additional legislation is required. Heavier fines and custodial sentences are also required if individuals are found transporting these invasive species into Ireland and within the country. An interesting footnote to S.I. 477 of 2011 is the absence of pike from the Third Schedule (Part 2A). During a consultation held on the draft regulations in 2011 by the Department of Environment, Heritage and Local Government, IFI made a submission requesting that pike be added to the Third Schedule.7 Why were pike deliberately left off this list (Third Schedule) but still are classed as 'non-native influencing ecology' under the WFD? If this proposed legislation is signed off without an appropriate assessment screening, it will be another impotent inland fisheries bye-law on the Irish Statute Book that will be subject to legal challenges in the future thus making its enforcement a pointless exercise. In conclusion, events over the past six to seven years have shown IFI to be a completely inadequate, morally bankrupt, rudderless, dysfunctional, incompetent and fractured organisation. This proposed Clare River system bye-law is another pathetic and misguided attempt by a broken statutory body to manage the angler whilst deliberately ignoring substantive issues such as water quality and non-native/invasive freshwater fish which directly affect brown trout conservation and their sustainability. Finally, why are some IFI staff in the Western River Basin District (WRBD) colluding with certain individuals with vested interests on the east side of Lough Corrib in this futile virtue signalling exercise, which will achieve absolutely nothing for brown trout sustainability?</p>		
PC145	Object to the draft bye-law	I believe this proposal is solely intended to divide trout anglers on the Lough Corrib. There is no extensive scientific analysis. I oppose this proposal	14/09/2023	14/09/2023
PC146	Object to the draft bye-law	Anglers are not to blame for the reduction of fish stocks. There are more substantive issues to blame namely invasive pike predation and pollution. Pollution caused by excessive agricultural practices that have been advised by Teagasc goes unchecked. Invasive species control on Lough Corrib in paltry, local trout anglers remove far more pike, perch etc than IFI and its all done on a voluntary basis. This proposal is a scurrilous attempt to remove anglers rights and bolster the businesses of greedy vested interests based on the Eastern side of Lough Corrib. I opposed this proposal it has no merit.	14/09/2023	14/09/2023
PC147	Object to the draft bye-law	There is no data or science , no AA screenings to support this proposal, Just an empty proposal. All IFI have to do is remove the pike and this will compensate for the losses to angling pressure. I oppose this ridiculous proposal. It is a waste of taxpayers time and money that would be better spent on dealing with the substantive issues.	14/09/2023	14/09/2023
PC148	Object to the draft bye-law	This proposal is based on a cohort of vested interest from the Eastern side of the lake only interested in supporting their own business. Bye law 806 and 809 was not needed on our salmonid SAC's. I oppose this legislation.	14/09/2023	14/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC149	Object to the draft bye-law	IFI have failed to manage the brown trout stocks on Lough Corrib. There is little or no cyprinid control over the last 20 years. , ineffective pike control, complete inability to tackle pollution all around L. Corrib, IFI management failures. Closure of hatcheries. Ineffective control of invasive weed. Poor management of funding mechanisms to local community/club initiatives. Total lack of support for trout angling clubs involved in pike control. Complete collapse of the IFI Board. PAC, WRC and Garda investigations taking up valuable time and resources. Inability of IFI to conduct the powers of the Habitats Directive and the Water Framework Directive, failure to address the Owenriff River System calamity. This proposal is farcical and without merit. No evidence to show trout are under threat. Catch and Release has little or nothing to do with the overall trout population on Lough Corrib.	14/09/2023	14/09/2023
PC150	Object to the draft bye-law	IFI have failed to control predatory invasive pike numbers on L. Corrib which eat 250,000 trout on Lough Corrib SAC every year. No Science presented. This will create 2 separate jurisdictions on one SAC, how will your manage two. The people who want this bye-law only want the trout for their own businesses.	14/09/2023	14/09/2023
PC151	Object to the draft bye-law	If it wasn't for the trout anglers, Lough Corrib would be in the same place as Lough Carra but your are happy to blame anglers for your failings. This is not good enough. Please stand up and take responsibility for your inaction on pollution, your failure to tackle central government and your failure to implement the relevant EU legislation on Lough Corrib. Plese concentrate your efforts on the real issues and stop dividing the people who really care for the system. I am against your petty proposal.	14/09/2023	14/09/2023
PC152	Object to the draft bye-law	I do not see a drop off in trout numbers, There has not been any evidence to proved there has. IFI were better spend their time on more riparian works to compensate for the losses, open more trout hatcheries instead of blaming anglers for fishery managent troubles. I oppose this proposal	14/09/2023	14/09/2023
PC153	Object to the draft bye-law	Trout are not an Annex 11 species, they are not endangered, Pike pose a greater threat to trout stocks and should be managed	14/09/2023	14/09/2023
PC154	Object to the draft bye-law	Reject the notion that this proposal has an legitimacy	14/09/2023	14/09/2023
PC155	Object to the draft bye-law	Any lowering in bag limits on the Clare or any place else in the Corrib system is something I want to protest. This proposed harvest limit and decrease have no scientific foundation, no documentation to back up its effectiveness as a measure, and are only motivated by human sentiment. I am concerned that this regulation may result in fewer out of-town anglers visiting the area, as happened when restrictions on the bag limits of pike and other coarse fish were implemented. The bag limits could also eventually spell the end of trout fishing because no-harvest fishing will become a cause for concern for animal rights advocates. We need to regulate population growth and properly manage the corrib system's production, as well as remove unwanted fish like pike from lakes and rivers.	14/09/2023	14/09/2023
PC156	Object to the draft bye-law	I wish to object to the proposed Clare river bag limit Bag limits have nothing to do with good fishery management I will not support the plan as it stands Original submissions have been totally ignored By-laws 806 and 809 need to be removed There is no need to alter bag limits at this time Staffing levels need to be increased There has been no work done on the streams for many years I agree with Bio Security being enhanced We cannot and will not allow pike or other invasive speciesto take over our Salmonid lakes I hope you will take onboard the points I have addressed	14/09/2023	14/09/2023
PC157	Object to the draft bye-law	1. There is no Science behind the move; we would like to see proper scientific management of the Corrib system. 2. There is a perceived problem with Poaching and people removing more fish than the present Bag limit allows, this is a policing issue and reducing the bay limit will not address people who are abusing our Lakes and Rivers. 3. Since the change over from the Western Regional Fisheries Board investment in the Corrib system has been cut, with basically no development since the formation of Inland Fisheries Ireland. 4. We feel that the Clare River and all other spawning rivers should be closed to all angling from September 1st, this includes Coarse Angling. 5. We have been involved in Trout Fishing and Farming all our lives and have invested time and effort in protecting a Stream running adjacent to our land with Fencing to make it stock proof. 6. The pollution of our rivers and the introduction of Alien Fish will be the death of our Trout and unless these issues are addressed the Trout will disappear and if nobody ever took a Trout again it will not prevent this. 7. This move has no evidence in fact there are mortalities associated with Catch and Release angling as well. 8. Please stop all Salmon Angling on the Clare River as this may do something to help Salmon	14/09/2023	14/09/2023
PC158	Object to the draft bye-law	Keep the 4 bag limit. Control Pike on the Clare System.	14/09/2023	14/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC159	Object to the draft bye-law	<p>Two attachments on email I totally disagree with the proposed bye law on the Clare River for a daily bag limit of two brown trout .</p> <p>Why does inland fisheries Ireland want to impose legislation on the Clare River? clubs on the Clare River are already observing a voluntary 2 bag trout bag limit. Lough Corrib is an (SAC) special Area of Conservation, Brown Trout migrate to the Clare River from the Lower lake into the Clare River and its tributaries for spawning. The system is hydrologically linked within the (SAC) .</p> <p>It unbelievable and disappointing that (IFI) would seek to have an independent and an isolated Bye law on the Clare River while not referring this discussion to the Western lake's plan 1st and 2nd draft where inland fisheries Ireland acknowledges the Clare River as part of the Lough Corrib Catchment and Lough Corrib SAC. I am seeking legal advice on this matter as I have contributed to two public consultation process already.</p> <p>This Proposed bye law seems to be designed to cause a further split in the Lough Corrib angling trout clubs and the Clare river trout and Salmon clubs. This is very evident with a new group's been set up on the eastern shore of Lough since the controversial (MOU) memorandum of understanding, which was set up by the previous (CEO) of inland fisheries Ireland and other private vested interest... It is now my understanding that not all of the Clare river angling clubs are in favour of this proposed Bye law...</p> <p>How can IFI propose to introduce a so called conservation BYE LAW while they stand over along with their Department of Environment the protection invasive non native fish species under bye laws 806 coarse fish BYE LAW and pike Bye law 809 of (2006). In doing this they are totally contradicting the Habitats directive and the Water frame work directive..These repugnant Bye laws should be removed from SACs immediately...These non native fish species are having an influence on the Native salmonid species and given these invasive non native fish species more protection than the Native species therefore effecting biodiversity and the ecology on the Native Habitats and not up holding the Integrity of the (SAC).</p> <p>I have recently seen an AIE document (attached) stating that IFI does not hold any documents to suggest the Rod and line Angling is having an adverse effect on Brown Trout Stocks on Lough Corrib SAC. On these grounds it is hard to again understand why management of IFI would want to impose such a BYE LAW on a 2 trout daily bag limit unless IFI are being lobbied by some private groups to do so!!!!</p> <p>The western lake's plan 2nd draft (Attached) doesn't mention in any form that Angling is effecting brown trout stocks on Lough Corrib its rivers, or tributaries.</p> <p>Over the last 15 years, The mismanagement by IFI to the western lake's including Lough Corrib SAC and the owneriff system, with the withdrawal of service's , withdrawal Staff, stopping pike management programmes by the last CEO The selling off of store's, the backing down of inland fisheries Ireland from the Corrib plan stream enhancement work's and riparian work's, the resignation of the Board chairman and board member's, The attendance of IFI at the public accounts committee this year, current Garda investigation , A call from political groups stating IFI is not fit for purpose, A statutory body that can not secure government finance to carry out their statutory duty ..</p> <p>Looking at all these negative issue's it is hard to have confidence in the management of IFI.. I would like to state that a lot off the staff on the ground are very pleasant to work with on local projects..</p> <p>There seems to be a hard line taken by the some officials in the department of Environment to drive a mixed fishery Model on Lough Corrib SAC and its tributaries and they seem to have an agenda to make sure the Clare River and Lough Corrib SAC will not be managed solely as a salmonid fishery.. In my opinion there seems to be support within certain divisions of IFI that do not want The Lough Corrib catchment managed solely as a salmonid fishery this is very worrying as the Government in its programme for Government states the Western lake's should be managed as salmonid fishery.</p> <p>It is time to bring back a form of regional boards as the current IFI is failing in its responsibilities..</p> <p>I totally disagree with this Clare River daily 2bag limit for Brown Trout as it again blames the anglers while IFI sits back to promote catch and release angling which have appasaloutly nothing to do in fisheries management</p>	14/09/2023	14/09/2023
PC160	In favour of the draft bye-law	<p>I wish to express my support for the new Bye Law of 2 fish bag limit for the Rivers Clare, Abbert, Dalgan, Grange and Sinking.</p> <p>I think its a great idea and should be proposed for Lough Corrib Lake as the Quality of angling has fallen off hugely over the last decade and is noting to like it was 20 years ago.</p>	14/09/2023	14/09/2023
PC161	In favour of the draft bye-law	<p>As an avid trout fisherman I would like to support the new bylaw with its ammendments to reduce taking home 2 trout as a conservation measure.</p>	14/09/2023	14/09/2023
PC162	In favour of the draft bye-law	<p>I believe that catch and release is an increasingly important aspect of sustainable fishery management and that a bag limit of even one fish per day would be more than adequate. I also believe that the size of fish permitted to be retained for the table need not be larger than 2lb (certainly no larger than 3lb). Ireland's wild fisheries are a valuable and highly prized resource, with any fish caught and returned having contributed value but also remaining as its highest value assets; the longer they survive, the greater their value is likely to become, both in trophy size and their contribution to future generations. Trout angling and the value/revenue it creates need not be at the expense of the very fish that support it. Perfectly viable fisheries operate on a predominantly or even wholly C&R basis, without the inherent detriment of exploitation. Wild fish populations are a finite resource that deserves all the protection we can afford them to ensure that they thrive long into the future. With the lack of options proposed, I certainly support the increased protection afforded by the new bylaw, but would personally advocate:• 1 fish bag limit• No fish > 2lb to be retained• Campaigns to highlight the potential impacts of exploitation and to promote trophy fisheries through increased adoption of voluntary catch and release</p>	14/09/2023	14/09/2023

Public Consultation Submissions received in response to the proposed 'Galway District - Conservation of Trout in the Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-law' Aug-Sept 2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC163	Object to the draft bye-law	I wish to object to any reduction in the bag limits on the Rivers Clare, Abbert, Dalgan, Grange and Sinking or any corrib system, there is no scientific effidence, its merely human sentiment, as a local angler if I want to take 4 fish this is up to me, I do practice catch and release on most days fishing but if I want to take some fish for the table that should be up to me and not a few people pushing catch and release fishing for there own benefit. There seems to be a particular group of anglers pushing this agenda and people sitting behind a desk try to enforce laws upon us. The fisheries should be doing more patrols on the river to stop breaking the existing laws never mind try to put more regulations on the anglers that are upholding the existing ones.The fisheries should be doing cormorant culls on Lough Corrib they are doing more damage than any angler, last week when fishing in Annaghdown there was more than 30 cormorants on one bunch of rocks alone, there is lots more as you travel further up the lake,The fisheries should be controlling the invasive species which will help the stocks of our natural salmonid system.	14/09/2023	14/09/2023
PC164	Object to the draft bye-law	What is the science behind this , and what studies have been conducted? Fish stocks are not being hampered by the anglers and this will not fix any problems.I do not believe this is good fishery management. I want the river, and the lake properly managed for Trout, as stated in your Western lakes plan.Invasive fish species need management, water quality needs to be improved, excessive farming practices have to be controlled... etc. The benefits of this would far outweigh a bag limit.	14/09/2023	14/09/2023
PC165	In favour of the draft bye-law	I want to express my support for this new proposed by law of 2 fish. This is long overdue.	14/09/2023	14/09/2023
PC166	Object to the draft bye-law	PDF Document attached to email. FISSTA explained to all their interested NGO colleagues that this bye-law was put to public consultation to embarrass the Minister, and his Department to deflect attention from the lack of action in removing the offending 806 and 809 byelaws as IFI advised in 2021. Our salmonid resource are left unprotected while non-native species are still afforded the protection under Bye-law 806 and 809 which must be removed immediately. IFI cannot defend this environmental and economic threat to our wild brown trout and salmonid habitat any longer. FISSTA are therefore vehemently opposed to the proposed Clare River bye-law of two brout trout limit and FISSTA see it as another desperate and divisive measure to deflect, confuse and distract our members from the task at hand. We must state clearly this proposed bye-law will not safeguard these unique and important habitats while a mixed stock coarse fishery is being pursued as a policy of appeasement.	14/09/2023	14/09/2023
PC167	Object to the draft bye-law	PDF Document attached to email..In summary, the protection of pike and all coarse fish is not acceptable on any SAC including Lough Corrib SAC. The protection of non-native/invasive species is repugnant to EU legislation. Are IFI happy to allow the continual degradatation and destruction of Lough Corrib SAC? We now have illegally introduced carp in 2023 protected by the Coarse Fish Conservation Bye-Law No. 806 (2006) in Lough Corrib SAC, what is waiting to be found in 2024?	14/09/2023	14/09/2023
PC168	bye-law does not go far enough	I wish to comment on the proposed conservation measures which I personally feel do not go far enough. I strongly suggest that the maximum weight of fish allowed to be kept should be set at 3 lb weight .This should be also monitored by way of measurement and/or a max length be introduced .It should be incumbent on the angler to take measures not to breach this law and a promotional campaign should be introduced to increase awareness	14/09/2023	15/09/2023
PC169	Object to the draft bye-law	as per PC 157	14/09/2023	
PC170	Object to the draft bye-law	Atlantic salmon an Annex II species listed in SI 384 of 2022. The mapping (Attachetd to amail) within the SI indicates the the natural range of Atlantic salmon is the entirety of the special area of conservation to include all of its hydrologically linked portions. The same natural range would also apply to native Brown trout. The Clare river is hydrologically linked to Lough Corrib main lake. (see above map) Therefore would the following not constituent a legitimate position should the proposed bye-law be enacted. An angler could retain 2 trout on the Clare River portion of Lough Corrib under Clare river bye-Law XXXX. And on the non Clare River portion of Lough Corrib to include all other tributaries / distributaries a further 4 trout under trout conservation bye-law 840 of 2008.? The proposed Clare river draft bye-law and the existing Trout Conservation bye-law 840 of 2008 wound not be mutually exclusive.?	08/09/2023	12/09/2023
PC171	bye-law does not go far enough	Where I believe this to be a good idea and it does have my support, I feel it doesn't go far enough at this point in time, with the seemingly dwindling numbers of salmon and trout stocks.In my opinion, any salmon or trout killed or maimed to the point where it will not survive is where the limit should be at. In my opinion, one way to implement this simply, would mean that if a salmon or trout (of any size) ingests a hook beyond a set distance from a particular point(e.g. beyond the length between its nose and it's eyes), then that should count towards the fishermans catch limit, on the basis that the fish has little or no chance of survival(likely due to internal bleeding), even with the hook removed.It is my opinion, this(or something similar) should apply in all bodies of water, nationally. In my opinion the bag limit reduction should also be applied nationally.	18/08/2023	18/09/2023
PC172	In favour of the draft bye-law	I would like to endorse the new bye law which would limit the daily catch to 2 brown trout	18/08/2023	18/09/2023

Ref No.	In Favour/ Objection	Submissions Received	Date Received	Acknowledge ment Issued
PC173	In favour of the draft bye-law	<p>I fully support the new proposed draft Bye-law, cited as Galway, District - Conservation of trout in the Rivers Clare, Abbert, Dalgan, Grange and Sinking Bye-law No. XXX 2023.</p> <p>It is obvious to all local anglers that I have talked to, who share a concern for the Irish fisheries, that the current by law governing the protection of our fisheries is one which isn't working. Our local fisheries continue to decline and at the moment there is no sign of a recovery which is very sad indeed!!!</p> <p>There are many theories why this is happening and water quality, water abstraction, land drainage, modern farming practices and the presence of predatory pike have been cited as potential causes for the demise. They are all issues which we need to address, however they are not the main reason for the catastrophic decline of the western lough fisheries. In my opinion most of the evidence points towards water quality being the main issue currently affecting the fisheries, however angler pressure is certainly an important factor that also plays a role, and this can be more easily controlled.</p> <p>The trend of poor fishing is now being repeated year after year. There has been no positive sign of long-term recovery. To add to the problem, anglers are now better equipped, share information more easily via the internet, and they fish more intensively over longer periods of time. As a consequence, the window of exploitation has increased, and as a result level of exploitation has increased. It now takes fewer anglers to achieve the same detrimental effect. The Bye-law no. 840 2008 is not working, and if our fisheries are to recover we need to change this outdated bye-law asap!!!</p> <p>In my opinion a good area to begin is by focusing on protecting one of the main spawning rivers which feed into lough Corrib, the Clare River and its tributaries. Protecting this area should ensure that more mature fish making the spawning redds are able to fulfil their natural function, to reproduce more offspring.</p> <p>The mature trout of the Clare river deserve more protection, and the new proposed Bye-law No. XXX 2023 would certainly provide them with this protection.</p> <p>Ireland's fisheries need immediate help and we should support any positive means of doing this, such as this policy being suggested. Thank you for your kind consideration of my submission!</p>	18/08/2023	18/09/2023
PC174	In favour of the draft bye-law	I agree that the bag limit for brown trout on the Clare River should be reduced from four fish to two fish per angler a day	19/08/2023	18/09/2023
PC175	In favour of the draft bye-law	I agree the bag limit on the Clare River should be reduced to 2 fish per angler per day	19/08/2023	18/09/2023
PC176	In favour of the draft bye-law	I support the introduction of the 2 Trout bag limit in the Clare river,	19/08/2023	18/09/2023