Commercial Boat Club,
Steamer's Quay,
Galway.

Policy Review,
Inland Fisheries Ireland ,
Sunnyside House,
Macroom , Co. Cork
28th November 2016

RE: Public Consultation - Pike Management in Brown Trout Fisheries

Dear Inland Fisheries Ireland (IFI),

I am writing to you on behalf of The Commercial Boat Club (CBC). Situated on the lower reaches of the River Corrib , just above The Salmon Weir , we were founded in 1875 and currently have a membership in excess of 500. Throughout our long history , our club has always regarded Lough Corrib as a Salmonid fishery. It is fair to say that it has long been the ethos of our club . This practice is reflected by our striving to help preserve or where possible improve the fishery as a Salmonid Fishery.

For several decades The CBC through its members has played a significant role in the maintenance, development and promotion of Lough Corrib as a Wild Salmonid Fishery, primarily on Lower Lough Corrib but our membership and influence extends to all parts of Lough Corrib & indeed to a lesser extent on Lough Mask and Lough Cara.

Over time we have invested, with due diligence, in the facilities at our base on Streamers Quay on the lower River Corrib. Moreover, we have significantly contributed to the enhancement and preservation of the Trout Hatchery in Oughterard. For several decades we have participated in the process of rearing and introducing indigenous trout fry to Lough Corrib, often with the advice of the Western Regional Fisheries Board (now Inland Fisheries Ireland).

Our history demonstrates that we have consistently endeavoured to preserve Lough Corrib , in particular the lower lake , as a wild Trout fishery. We have for several decades held fishing competitions to remove Pike from the lake. We still maintain this practice by hosting two of these competitions during the summer months with the full cooperation of the IFI. We also support other clubs with their competitions by participating in and in certain circumstances by facilitating the events from our Club.

Historically , our members would have held the view that Pike , when possible , should be removed from the fishery. We have long practiced this assertion , not just on competition days but also on recreational fishing days on the lake. The Commercial Boat Club have a very strong view that the Pike Bye Law 809 (2006) should not be in force on Lough Corrib or its system . Our belief is not based on emotion or on anecdotal evidence but on experience and hard facts.

Because of our long history, we have considerable evidence when Pike numbers are not managed they have a drastic influence on the stock of adult Trout on Lough Corrib. For example, during the early 1950's records of caught trout numbers were reported as low, however once a strategic

predator control plan was introduced to control Pike by the Inland Fisheries Trust , there was a noticeable increase in the numbers of Trout in subsequent years. In more recent years , for example during the late 1980's into the early 1990's there was little or no angling or predator control in practice. However , records show that once anglers returned to the lake there were noticeable increases in the numbers of Pike and a significant decrease in the numbers of reported trout caught at that time.

In "The Ecology , Biology and Management of Pike in Irish waters with particular reference to Wild Brown Trout Fisheries" (O'Grady & Delanty 2008) the study reaches many conclusions , for instance : the necessity for controlling adult pike populations in managed lake trout fishery is a straightforward issue for many reasons :

- Adult Pike in Trout lakes show a clear preference for consuming adult Trout even in circumstances where other fish species are much more abundant than Trout
- In circumstances where Pike are feeding principally on Trout a relatively small Pike population could consume a very substantial adult Trout population. A substantial adult Pike population can "cap" an adult Trout stock.
- The quality of Trout angling on many managed Lake Trout Fisheries will decline markedly where adult Pike stocks are not managed.

Since the introduction of the Pike Bye Law 809 (2006) (where anglers may remove only one pike per day and none in excess of 85cm) on Lower Lough Corrib we have noticed and in certain circumstances recorded (in our annual fishing competitions) that (a) a noticeable increase in the numbers of large Pike caught, many in excess of 85cm (which must be returned) & (b) the decrease in the numbers of young adult trout numbers (33cm – 35cm) caught.

While this Bye Law may be better suited to or desired in other fisheries, clearly it is not suited to the wellbeing of Trout stocks in Managed Lake Trout Fisheries. By attempting to enforce a national policy on all fisheries is at best short sighted and at worst may be seen as an attempt to only promote fisheries for Pike and coarse angling. By restricting the removal of Pike to just one per day further enhances the rapid expansion of this species. The CBC seeks the removal of Pike Bye Law 809 (2006) from the Corrib system with immediate effect.

To assist the IFI in the continued management of the Pike population on the Corrib system, our Club suggest and also request that training be provided to our members in the proper use of Gill Netting so that we can help the IFI in the continued practice of Pike removal by this method. Selection of appropriate personnel may be similar to the process used in the old "Water Keeper" method. Control, selection and management of appropriate areas would be at the direction of the IFI. We are very keen to pursue this and are willing to cooperate in any way possible. We would be willing to offer this service without remuneration.

As Lough Corrib is a Manged Trout Fishery , we suggest the closing of the fishery to all fishing from the 31st October in any given season. While the Trout season finishes in on 30th September , it is accepted and well known that Pike gather at the mouth of the major Salmonid spawning routes, for example the Clare and Cregg rivers on the Lower Lough Corrib. We maintain that it is imperative to permit unrestricted Pike fishing until the end of October to enable the removal of Pike and their substantial threat from these areas. Our suggestion to then close the fishery until the opening of the new Salmon , Trout & Sea Trout season is to promote the recovery of the fish which have spawned without the risk of being caught accidentally or otherwise.

Our Club's location , as it is on the lower reaches of the Corrib system , makes us acutely aware that the fishery is a very important habitat for migratory fish such as Salmon , Sea Trout and Eels . The threat to the Atlantic Eel is already well documented and a protection order is in force for this species for the foreseeable future. We advocate that we continue to preserve the Corrib system in its entirety as a Managed Trout Lake System . Continue and expand the methods of managing the Pike population so as to avoid issuing a protection order in the future on Salmonid species.

There are literally hundreds of Pike and Mixed Species fisheries throughout Ireland, there are only seven lakes where the IFI conduct Pike population management. We urge that as an absolute minimum this remains the case, otherwise we have a situation where a monopoly arises in the provision, protection and management of fisheries. This must not happen.

As members of the Lough Corrib Angling Federation and because of our widespread membership we are acutely aware of the views of anglers throughout the Corrib System. We know that the wide held if not unanimous view of anglers who frequent the area is that the Lough Corrib System should be permanently designated a Wild Salmonid Fishery. That the control of the Pike population be conducted in a manner that protects the Trout population and its position as a prime Wild Salmonid Fishery. There is no local desire, wish or request to designate the fishery a Mixed Fishery. There is only a determined conviction that the Pike population be managed with the exclusive intention of preserving Lough Corrib as a Wild Salmonid Fishery.

To recap, the Commercial Boat Club request that:

- The Corrib System in its entirety continues to be designated a Managed Trout Fishery.
- That Inland Fisheries Ireland(IFI) continue to control the Pike population on the system in a manner that is of benefit to preserving Lough Corrib as a Wild Salmonid Fishery
- To permit IFI and local angling clubs freedom to control the Pike population by whatever means necessary
- To remove with immediate effect Pike Bye Law 809 (2006) from the Corrib System
- The IFI or appropriate designee train selected Clubs in the removal of Pike by Gill Netting or other appropriate means on the Corrib System
- That Lough Corrib and its entire system be permanently designated a Wild Salmonid Fishery; that the system be manged to protect it in this designation.
- That IFI permanently manage the Pike Population on Lough Corrib and its entire system.

The Commercial Boat Club consider it misguided to attempt to implement a uniform set of regulations for all fisheries and in the management thereof. Further we regard it be imperative that Pike populations be controlled and manged on all Managed Trout Fisheries and to be seen as separate from a uniform set of rules in the administration of such a policy. We believe that Inland Fisheries Ireland (IFI) are currently the appropriate authority to manage the Corrib system and should be permitted to do so unhindered. Finally we offer our assistance in any way possible in the preservation of Lough Corrib as a Wild Salmonid Fishery and in the management of the Pike population on the system.

Yours Sincerely,

John Cloherty

Hon. Chairman Commercial Boat Club.