

Objections against the draft regulation of the Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2024

Please find below our objections against the draft regulation of the Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2024

In rivers with a substantial run of MSW (multi sea winter fish), like the river Moy, the existing and proposed regulation doesn't protect those fish as it should. The practice is unsustainable.

Below is our demonstration for the river Moy.

With the existing calculation of available fish to harvest, the numbers of grilse (1 SW) and springers are mixed. This is not an efficient method to protect both stocks. With a log book return of approx. 50% and ongoing poaching, the exploitation rate is highly underestimated. We can also raise doubts about the assumption that the proportion of springers, which are collapsing all over the distribution area, is still as high as 20 years ago...

With the given number of 6411 fish in the 2024 draft, the total available spring salmon to harvest for the river Moy in 2025 would be $6411 \times 0.086 = 551$.

Knowing that the Conservation Limit (CL) of springers is 1188 (IFI 2011 figures), the total run of MSW is estimated at $1188 + 551 = 1739$.

As the average exploitation rate for the past 5 years has been 28%, we can estimate that $1739 \times 0.28 = 487$ MSW fish will be killed.

This number is very close to what could be theoretically harvested to guarantee that the CL will be left for spawning. Not to mention the fact that the exploitation rate of springers is always higher than the grilse one, which would logically make it higher than 28%. We would also like to know what sort of calculations and methods are used to find those figures of CL, percentage of MSW, surpluses and exploitation rates, on which the survival of our salmon depends. Taking into account the underestimated exploitation rates of MSW due to unreturned log books, untagged fish and poaching, the protection of the MSW fish on the river Moy is far from being guaranteed.

Furthermore, to allow any angler to kill 10 springers per season in these times of dwindling salmon stocks is highly unsustainable and goes against other actual practices all over Europe where protection and care are at the forefront of policy making. Therefore we propose a system where the springers (MSW) would be better protected. For example, we could adopt a system as in Denmark or France where there are separate quotas for grilse and springers (e.g. 1 green tag per season for one springer). The size and amount of springers allowed to be kept would have to be defined. Once the quotas would be reached, fishing would still be possible on a catch and release basis only. It would also have to be assured that every fisherman can just obtain the specified amount of tags allowed per year, which is not possible with the existing non digital licence management. The current license management system can be and has been exploited. Without a digital system, it is impossible to ensure that the same individual does not purchase a second license, and therefore a second set of tags. Therefore, the whole licence-tag system should be digitised and every fish should have to be recorded online by the end of the day.

We would also like to emphasize that the period of about two weeks (Christmas period included) between the deadlines for the submission of public feedback and publishing of the new regulations is extremely short. It does not appear to give sufficient time to consider the feedback properly, before signing the final document. With the regulations coming into effect on the 1st of January 2025 and the deadline for submissions being on the 18th of December 2024, we wish IFI and minister Eamon Ryan a very studious Xmas.

Foxford, 25 th. of November: Yann-Fanch Guegan and Reto Coutalides