

# SLANEY RIVER TRUST

Sean Kyne, T.D.,  
Minister of Department of Communications, Climate Action and Environment,  
Inland Fisheries Division,  
Elm House,  
Cavan Town.  
H12 A8H7.

3rd December 2016

Ref: Draft Wild Salmon and Sea Trout Regulations – Re River Slaney

Dear Minister,

We are writing to you on behalf of anglers, riparian owners and fishing clubs along the River Slaney. We have been working together now for a number of years under an umbrella organisation. Our main role is to help protect the river with a particular emphasis on enhancing and improving fish stocks.

### *The Draft Proposal*

We are writing to you to object to the proposal to close the River Slaney to salmon fishing in 2017. We believe that this proposal, if implemented, would be far more likely to harm the salmon stock than help conserve it. This is because the closure of the river removes from the river bank the greatest inhibitor to poachers – the presence of concerned anglers. It would in effect leave the banks unpatrolled, given the scale of the task facing the under resourced IFI staff on their own.

### *The Current Arrangement*

You will be aware that the anglers have operated on a catch and release basis using single barbless hooks in recent years. This makes the capture of a salmon extremely difficult. The associated mortality is, in our direct experience, miniscule. We have no doubt the draft proposal, however well intentioned, has taken no account of the much increased mortality to salmon from poaching that would arise under the proposed regime.

Office: Ballybawn Lane, Rathnure, Enniscorthy, Co. Wexford.  
Committee: R Burgess, D Dobbs (Treasurer & Deputy Chairman), K Dodd, T Mernagh  
(Secretary), D Ryan, N Scott, K Whelan (Chairman)

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## *Assessing Fish Stocks*

The Scientific Standing Committee have not provided any information on why they have reached their decision. Without this information we feel the consultative process is one of form rather than substance. We would be particularly concerned to ascertain the extent to which account has been taken by the scientists of the likely impact of poaching under the proposed regime, as against the current 2016 regime.

We understand that Inland Fisheries Ireland assess the level of fish stocks in the River Slaney with limited resources. The absence of an operational fish counter, which has not been operational since 3<sup>rd</sup> January 2016, means that stocks are assessed primarily through electro fishing and by rod catch data obtained from anglers returning their log books. The extent to which representative Redd Counts were available in any assessment is also a factor.

Using logbook returns to assess stocks on the River Slaney is in our view, not an appropriate measure due to the following:

Recorded fish catch is a poor indicator of fish stocks on The River Slaney due to the regulation that anglers must fish with single barbless hooks. Anglers who lose fish (which is more often the case when using single barbless hooks) clearly can't record them as catches. The Slaney is predominantly a fly only fishery, and therefore catches are lower than would be the case if other fishing methods were permitted (e.g. spinning).

The fish counter (currently broken due to flood damage), which has been operational in previous years, only records fish which travel through the "Denil Fish Pass" at Clohamon Weir. While it might be an index, we have no idea what percentage of the entire run swim through this pass. The extent to which fish use this route is also determined by water levels, and therefore the percentage of fish traveling through this pass will vary considerably from year to year, depending on rainfall amounts. You will be aware, that there is second fish pass on the weir, which has no operational counter and that fish swim over the weir in high water avoiding both passes.

Furthermore, over 200 salmon were released over the weir following a rescue operation from the Mill Race in August 2016 (similar operations have been carried out in previous years). These fish represent an integral part of the relevant escapement, and should have formed part of a comprehensive assessment.

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## *The Real Challenges*

Salmon face many challenges, many outside the control of anglers, owners or the Minister. The Trust would ask the Minister to direct his attention, and that of Inland Fisheries Ireland to addressing the problems we can control – such as the protection regime on the river bank and the disastrous situation currently where large numbers of Salmon and Sea Trout are being trapped in the Mill Race at Clohamon.

Addressing the recurring problem at the Mill Race where large numbers of fish are trapped and unable to spawn would be a worthy challenge for the policy makers in your Department and in the IFI. The Slaney is a Special Area of Conservation under the Habitats Directive, mainly because of Ireland's scarce multi sea winter salmon stock. Addressing these major sources of loss and mortality (poaching and the barrier to migration) would surely be the correct approach.

The Trust appreciates that you are anxious to do the best possible for the river, but the closing of the river to angling will not achieve that. It will rather expose the threatened stock to further predation by poachers, and de-motivate anglers, riparian owners and fishing clubs from protecting the stock in the way that their presence on a catch and release basis already does.

## *Loss of Water Keepers and Ghillies*

While there will be an obvious loss of income to the local economy if the river is closed, this is not a primary concern to The Trust. The protection of Salmon stocks must not be dictated in anyway by this. However, if the river is closed to salmon fishing, there will be negative consequences. Most fisheries put any income they have directly back into the river. A significant amount of this money goes towards the employment, on a part time basis, of numerous water keepers and ghillies who do an excellent job protecting the river against poachers, pollution and other threats. This resource will be gone if the river is closed.

**It is our belief that the proposal would for the reasons outlined above be a conservation disaster for the river.**

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## *Request*

We would ask you therefore to exclude the River Slaney from any proposal to close it to salmon fishing in 2017. A key requirement is more protection – not less, and this proposal because of the license it gives to poachers, is anathema to that goal.

Should you be inclined to continue with the proposal for closure, we would ask that you meet with us before making such a final decision.

We believe that consideration of the implications of closure as proposed for predation of the salmon stocks by poachers would indicate that the proposal for closure of the Slaney in 2017 is counter-productive and mistaken.

Yours Sincerely

Thomas Mernagh

Secretary  
Slaney River Trust  
[secretary@slaneyrivertrust.ie](mailto:secretary@slaneyrivertrust.ie)

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