

Culdee,  
The Pier,  
Annaghdown,  
Co Galway.

28 November 2016

Policy Review,  
Inland Fisheries Ireland ( IFI ),  
Sunnyside House,  
Macroom,  
Co Cork.

**Re : Public Consultation – Pike Management in Brown Trout Fisheries.**

Ref : Oughterard Anglers & Boatmen Association Lough Corrib Brown Trout & Pike Policy Document  
Lough Corrib Trout Angling Federation Policy of Angling  
IFI – National Strategy for Angling Development ( NSAD )  
IFI Brown Trout Policy 2014  
IFI Survey of Adult Fish Stocks in Lough Corrib 2012

A Chara,

As Secretary of Annaghdown Angling Club I have been tasked with making a submission on behalf of the Club in relation to the above matter. *At the outset, we firmly believe that Lough Corrib and it's catchment area MUST be retained as a brown trout fishery and all efforts MUST be made to achieve that objective.* It would be greatly beneficial for the country, the local economy and local angling enterprises and reverse the deterioration experienced over the last number of years.

Annaghdown Angling Club was established many years ago to provide a platform for Trout Anglers to fish and to try to ensure the water quality of Lough Corrib with the overall aim of ensuring that Lough Corrib remains as *the* Brown Trout Fishery, not only in Ireland but in Europe. Since our establishment the Club has demonstrated it's involvement in these Aims by the Trout Stream Development Projects which we supported, and continue to support, in conjunction with IFI and Cairde Loch Coiribe ( Sub-committee of Lough Corrib Trout Angling Federation ). We have supported these bodies through providing finance, physical labour and on-going inter-action with Fisheries Staff on the ground.

The Club has also been active in improving the angling and tourism facilities at The Pier in Annaghdown by financial contributions towards these improvements in conjunction with very generous financial contributions from the Local Community. Some of this work has been supported by Galway Co. Co. and Galway Rural Development ( GRD ).

We are very conscious of the vital on-going efforts of our Members and the Members of all other Trout Angling Clubs around the lake. We are one of the 13 Clubs which are affiliated to Lough Corrib Trout Angling Federation.

*In making this submission, we are aware that The Federation has made a submission and we are fully behind that submission. We are also aware that Oughterard Anglers & Boatmen Association*

***has completed a major piece of Research which is the basis of their submission. We concur with the findings of that submission and fully support them in their efforts.***

Annaghdown Angling Club is situated on Annaghdown Bay, just north of "The Narrows" about 45 mins boat time from Galway City and the famous "Weir" in the City. Over recent years we have seen a deterioration in trout returns by both Members and Angling Tourists. In fact, the number of Tourism Anglers has greatly decreased, similar to other areas of the Corrib. We feel that this deterioration can be laid at the feet of the pike stocks and we feel that this has to be addressed without delay.

Lough Corrib has a series of feeder river systems, mainly Grange / Abbert, Owenriff, Cornamona / Cong, Black etc... A recent article in the Connaught Tribune ( 18 November 2016 ) written by Danny Goldrick who is well known and respected in IFI circles, indicated that many of the smaller lakes between Oughterard and Clifden have been totally infested by illegally introduced pike. In fact all the small lakes feeding into the Owenriff River have become pike lakes to the detriment of trout and salmon. This System used to be a trout and salmon mardi-gras for both Irish and Foreign Anglers but alas no more.

IFI has / had a policy of gillnetting in efforts to control the spread of pike but it appears it has bowed to the Pike Lobby which will not listen to reason or science. This must not be allowed to continue and the sooner gillnetting re-starts the better. The pike is a voracious predator and in spite of allegations to the contrary, it feeds first and foremost on trout and salmon. A recent Pike Fishing Competition, under Section 59 Authorisation, returned a pike with a spawning salmon being digested in its gullet. Pictures of this are included in the Federation Submission. Pictures of this enraged the Pike Lobby which is in total denial about the spread of the pike in Brown Trout Fisheries and the harmful effects this uncontrolled spread is causing. It's not asking too much to protect and enhance the famous trout fishing waters of Lough Corrib for the betterment of the country, the lake and the local population of all angling fraternities.

There are only a small number of brown trout fisheries in Ireland and the bulk of them are in the West of Ireland - Corrib, Mask, Carra, Conn to name a few. Pike lakes are in the main in Leinster, Cavan, Monaghan but they seem to have the ear of some of the decision bodies. As a Club we have no gripe with pike angling, many of us started that way, but they must not be allowed to dictate policy on Brown Trout Fisheries which should all be classified as salmonid and trout waters under the Habitats Directive.

The introduction of the Bye-law 805 ( 2006 ) placing restrictions on the taking of pike from Irish lakes was probably a necessary evil at the time, but, while relevant in some fisheries, may be counter-productive when applied to Lough Corrib and we feel the Bye-law should be lifted / eased on the lake.

We therefore ask that this Fisheries Bye-law No. 805, the conservation of pike law, be lifted in wild brown trout fisheries, including Lough Corrib. We feel that this Bye-law in its present form is too sweeping so as to take into account the needs of a managed salmonid fishery.

It is widely accepted that pike control is an essential tool in the management of a wild brown trout fishery. From the most recent pike study of consequence carried out on Lough Corrib, in 1996 & 2012, it was asserted that an unmanaged pike population would account annually for

approximately 255,000 trout of 30-35cm. The 1996 Study led to the reintroduction of gill netting on the Corrib in an effort to control the pike population. This gill netting and new methods of electrofishing coupled with the cropping of pike by anglers seems to be doing the job of managing the pike population effectively.

However the introduction of the pike conservation bye laws, firstly in 2005 and amended in 2006 led to a serious reduction in the cropping of pike by Anglers and this has led to an increase in the pike population in the lake and has had detrimental effects on Coarse Angling Businesses around Lough Corrib. Many of these businesses have closed and the Pike Angling Tourists no longer look on holidays to this area as enjoyable. The reason for this is the restrictions placed on Pike Anglers regarding the current bag limit and size.

While there was obviously a need to bring in Pike Conservation Bye-laws to prevent the over exploitation of pike in recognised pike fisheries, there is no evidence to suggest that there was any need to protect pike stocks in managed wild brown trout fisheries. It would actually seem to be counter-productive as it led to the removal of an effective tool for selective predator control.

During the time when there was no angling regulation regarding pike on Corrib, anglers were able to assist in the pike control programme by removing larger pike from areas where the stock seemed to be getting too large. Anglers were efficient in removing some of the larger hen fish from specific areas, which we feel was a helpful exercise. The average size of pike being removed by gill netting, 1.2 kg would represent a hen fish capable of producing approximately 8,000 eggs, in stark contrast to this a large hen of 100 cm is capable of producing over 200,000 eggs.

Therefore we assert that the selective removal of larger hens at certain times of the year was very helpful in keeping down the number of juvenile pike entering the lake.

We feel that this Pike Conservation Bye-law needs to be revisited with regard to managed wild brown trout fisheries. As there are only a handful of recognised wild trout fisheries of consequence in Ireland, we feel that they should be exempted from this bye-law. There are numerous pike fisheries of note throughout Ireland, capable of producing quality pike angling and we feel that a properly controlled pike population on Corrib will still draw pike anglers as the lake has a lot more to offer the visitor than just catch returns.

We hope you will revisit these Regulations and change the anomaly that exists regarding protecting pike in a system where they need to be controlled.

A further concern of the Club is the decline of the pearl mussel population on the Owenriff River System

We would like to highlight the importance of salmonoid hosts in the life cycle of the freshwater pearl mussel which is protected under EU law (if Ireland doesn't protect the pearl mussel, the country is wide open to serious fines etc).

As a Trout Angling Club, we would like to see :

- A continuation of gill-netting and on-going removal of pike from the lake and it's feeder systems.
- The exclusion of Brown Trout Fisheries from the limitations of the Pike Regulations, a move which could potentially improve the economic well-being of those who promote and market Lough Corrib as a pike-fishing destination.
- A return of the Owenriff River System to a total brown trout system. All pike should be removed from the system and have it returned to it's previous eminence for salmon and trout.
- A continuation into the future of the removal of the invasive species vegetation which has had such detrimental effects in recent years.
- Lough Corrib designated as a salmonid and trout fishery included by the EU in the Annex I or II species list of the Habitats Directive.
- A continued engagement between IFI and the Federation ( umbrella body for the 13 Clubs around Lough Corrib ) in river enhancement and development for the betterment of Lough Corrib as a brown trout fishery. The Federation and it's Members are Stakeholders and very active Stakeholders and we would expect to be given the same respect as we afford IFI. Neither party has a monopoly on angling knowledge or experience.
- The status quo remaining in relation to catch & release. Some Clubs operate this in major Competitions but smaller Clubs weigh-in fish. The weigh-ins are governed by the bag limits imposed by law. Fish weighed-in do not have any effect on trout stocks.

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( Billy Kavanagh )

Secretary, Annaghdown Angling Club.