27 November 2016

Re: - <u>Submission of Public Consultation Process- Management of Pike in Designated Wild Brown</u> Trout Fisheries

The Lough Sheelin Trout Protection Association (LSTPA) in response to the public consultation process by Inland Fisheries Ireland (IFI) on the management of pike in designated Wild Brown Trout waters wish to make the following submission.

The LSTPA have entered into extensive consultation on this topic with our members and other interested anglers who regularly fish on Lough Sheelin.

The LSTPA are aware that a Trout Policy Document was developed by inland fisheries Ireland and was finalised in 2012. The issue of predator control in Wild Trout fisheries was dealt with in this policy document. To our knowledge no effort has been made by IFI to implement any of this trout policy document. Neither has IFI presented any scientific evidence to contradict the established scientific evidence that predator control is essential within managed Irish Wild Trout Fisheries. The LSTPA are extremely concerned that this latest consultation is one sided and totally unnecessary and that it is being carried out with the sole purpose of finding a way to further dilute IFI efforts to control pike numbers in wild brown trout fisheries as per agreement in Trout and Pike Policies of 2012.

Lough Sheelin is one of the most studied lakes in these islands. Numerous scientific studies have been completed on the biology of the lake including a number of PhD theses. There are data covering a period of time between the nineteen fifties and today on all aspects of the ecology of Lough Sheelin. All of the scientific information available indicates that predator control on the lake is critical to maintain consistent Wild Trout fishing on Lough Sheelin. A number of these studies have been carried out by the Inland Fisheries Trust, the Central and Regional Fisheries Boards and Inland Fisheries Ireland. There are no studies supporting the proposition that the removal of pike from Wild Trout waters is not beneficial to Wild Trout. I have attached at appendix one a non exhaustive list of scientific papers which support the argument for the removal of pike from Wild Trout Waters. (Appendix 1) There are no recognised studies available to support the proposition that the removal pike from Wild Brown Trout waters is not beneficial or necessary for the survival of Wild Brown Trout. Indeed the best scientific information available to us indisputably supports the opposite view.

Wild Brown Trout are an indigenous species present in our lakes since the last ice age. Pike are an introduced species and are not present in all lakes in the country. There are currently no pike in County Kerry and they are only recently introduced, illegally, to a number of lakes in Co Donegal and Connemara. There are still no pike in Lough Melvin and in numerous numbers of small mountain lakes throughout the country. Pike are an introduced species and are, despite what some are saying, a great threat to our Wild Brown Trout stocks.

The information from numerous studies carried out on Irish Wild Trout waters, including Lough Sheelin, clearly indicates that the removal of pike from these waters is essential to maintain good trout angling. Irish Trout fisheries are a unique resource and cannot be compared with reservoirs or deep lakes in England or continental Europe.

There are only 12 remaining recognised Wild Trout fisheries in Ireland and Lough Sheelin is recognised as one of the twelve. Again it is important to state that these fisheries are a unique resource and must be protected and managed as a unique resource. There are over 4,000 lakes in the country that support pike and other coarse fish. There are sufficient pike angling lakes within the country and only 12 remaining Wild Trout Fisheries. It is inconceivable that that current Management and Board of IFI will be deemed by many and by future generations to have overseen the destruction of Wild Brown Trout angling as we know and treasure it in Ireland. This is what will happen if predator control is not an intrinsic aspect of the management of Wild Trout waters. IFI cannot develop management plans for unique Wild Trout Fisheries based on campaigns on facebook and the internet by English pike anglers who will not be members of the EU within two years.

The area of Cavan in which Lough Sheelin lies is a mainly rural area with little industry other than agriculture. Angling tourism in the area provides much needed economic activity. Based on figures

Lough Sheelin Trout Protection Association

provided by IFI we estimate that Wild Trout angling in the Cavan Region is worth in the region of €12m per year. There is no doubt, based on the scientific information available, that this economic benefit will disappear if the predator control programme is not continued on the lake as part of an overall plan for the management of Lough Sheelin as a Wild Trout Fishery. The LSTPA would like to make it as clear as possible that this economic activity will be completely lost if the practice of predator control on Lough Sheelin is stopped.

The LSTPA have invested heavily in Lough Sheelin for over one hundred years with the objective of making Lough Sheelin one of the premier indigenous Wild Brown Trout fisheries in the world. In the past six years we have invested over £120,000 in stream rehabilitation work in conjunction with Cavan Monaghan Leader and IFI. We have always looked to work with the fisheries authorities in a collaborative and co-operative manner. It is the view of a large number of anglers that IFI have not kept their agreements with trout anglers over the last 2-3 years. Anglers will cite as evidence for this the lack of implementation of new bye laws as promised, the withdrawal of predator control on Lough Sheelin unilaterally during 2015, the ceasing of water analysis by IFI on Lough Sheelin, and the failure of IFI to agree a five year development plan for Lough Sheelin despite the willingness of the LSTPA to commit to providing substantial funding. There is a danger that there will be a complete breakdown of trust between Wild Trout anglers and IFI. The terms of reference for the proposed review group is completely unacceptable to the LSTPA and we will not accept any outcome that dilutes the already established scientific evidence in relation to pike in Irish Wild Trout waters.

The LSTPA wish to state that there is an agreement in place which was reached when the Trout and Pike policies were developed. These policies have never been implemented despite. We strongly urge IFI to implement these policies and stop wasting time and resources on another pointless study.

Thomas Lynch Secretary

Kenneth O'Keefe Chairman
Éamonn Ross Treasurer
Frank Kelly Vice Chairman.
John Murphy Ned Clinton
Peter Boyle Barry Harten
Albert Berry Michael Callaghan

Maurice Lyttle

Appendix 1

Went, 1957. The pike in Ireland, Irish Naturalist Journal. Vol 12 pp177-181.

O'Grady, 1981. A study of Brown Trout populations in selected Irish Lakes. PhD Thesis, NUI.

O'Grady, 1983. An estimate of the standing crop of pike in Lough Sheelin (1977-1979), Journal of Life Sciences, RDS, 4(2), 191-194

Fitzmaurice, 1983. Some aspects of the biology and management of pike stocks in Irish Fisheries. Journal of life sciences, RDS, 1661-173

Fitzmaurice, 1984. The effects of freshwater fish introductions into Ireland. E.I.F.A.C. Technical paper/document CECPI (42) Vol2 pp 4499-458

Gargan, 1986 The biology of fish and faunal communities in Lough Sheelin County Cavan. PhD Thesis, NUI.

Lough Sheelin Trout Protection Association

O'Grady, 1992, The necessity for Pike culling in managing Irelands premier Salmonid Lake Fisheries. CFB

O'Grady, Kelly and O'Reilly, 2008. Brown Trout in Ireland, ISSN; 1649-265x

O'Grady and Delanty, 2001. Current status of fish stocks in Lough Sheelin, a review of fluctuations of fish populations in this water and management recommendations for its management as a trout fishery. CFB

O'Grady and Delanty, 2008. The Ecology, Biology and Management of Pike in Irish Waters with particular reference to Wild Brown Trout Lake Fisheries, a position paper, CFB