

REVIEW AND ASSESSMENT OF FISHERY MANAGEMENT OPTIONS FOR THE MULCAIR
RIVER, CO LIMERICK



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1. Background

The Mulcair River rises in the Slievefelim and Silvermines mountains and joins the River Shannon downstream of the village of Annacotty, Co. Limerick. The main channel of the river is approximately 21.5 km long, and together with its tributaries, it drains a catchment area of approximately 650 km². This catchment area spans both Counties Limerick and Tipperary. The principal tributaries of the Mulcair are the Dead River, the Bilboa River and the Newport River. The catchment consists of upland and lowland areas, typical of many Irish river systems. The upland area is extensive and has numerous mountain peaks in excess of 400m. The lowland area is largely a flat river plain. The catchment topography reflects the underlying solid geology. The upland channels rise and flow over a sequence of Old Red Sandstone and Avonian Shales, before descending to the lowland corridor underlain with Carboniferous Limestone. The Mulcair Fishery is located within the Lower River Shannon Special Area of Conservation (SAC). The EU Habitats Directive 92/43/EEC provides legal protection for habitats and species within this Natura 2000 Network, which includes Special Areas of Conservation (SAC) and Special Protection Areas (SPA) designated under the EU Birds Directive 79/209/EEC.

Although modest in size by Irish standards, the Mulcair has a reputation as a highly productive salmon fishery, producing in the past very large numbers of grilse and salmon and providing consistently good fishing to local and visiting anglers. A spate system, the Mulcair fishes particularly well following floods. The catchment was subjected to several major agricultural drainage schemes which have seriously damaged the rivers suitability for fly fishing and has resulted in a situation where the majority of salmon are taken by spinning and bait fishing, when conservation regulations allow for the use of these methods. The fact that, post-drainage, the Mulcair recovered from such a profound physical upheaval and disturbance is testament to the productivity and resilience of the river. The current Conservation Limit is some 4,200 salmon and in good years, when stocks encounter improved marine survival, the river has the capacity to produce returns of two to three times this number of salmon. Recent genetic studies have shown that the Mulcair stock comprises over 90% of the original, wild strain and has been little influenced by juvenile salmon reared at Parteen Hatchery and stocked over the years into the main Shannon and its tributaries.

As the owner, the ESB controls fishing on the river by means of fishing permits. ESB has a number of appointed agents who sell both salmon and trout permits for fishing on the Mulcair River to members of the public. Permits are also distributed to local angling clubs where they are sold at a preferential rate to club members. ESB Fisheries also carry out maintenance works to the Mulcair fishery throughout the year ESB has entered into an agreement with Inland Fisheries Ireland, whereby IFI provide protection services, in order to control and enforce rules and regulations governing ESB's fisheries and fishing rights, including its fishing rights on the Mulcair River.

In October 2015, ESB engaged with IFI, local angling clubs and stakeholders on a review of the 2015 fishing season with a view to making some changes for 2016 on the Mulcair and Lower Shannon. Submissions were sought from all local stakeholders including angling clubs. Conservation of the fish stock on the river was a core component in the review while at the same time accommodating angling activity. A key element of the review in relation to the Mulcair was the fact that the river had not reached its Conservation Limit. The Standing Scientific Committee on Salmon (SSCS), of the Department of Communications Climate Action and Environment, determined that the river was only reaching 87% of its conservation limit and therefore only open under catch and release conditions for 2016. This decline in salmon numbers on the river was of serious concern to many and it was felt that additional conservation measures were required. Submissions were received by ESB from a number of clubs and organisations, as well as stakeholders. These were reviewed in conjunction with IFI and changes made to the price structure for permits and angling regulations for the 2016, including an extension to the fly only stretch on the river. A further

assessment by the SSCS in late autumn 2016, determined that the Mulcair was only meeting 83% of its Conservation Limit and it was recommended that again fishing for salmon would be limited to catch and release only for the 2017 fishing season.

In November 2016 ESB commissioned me to carry out an independent review and assessment of fisheries management of the Mulcair River, to consult with relevant stakeholders within specified time limits and to make recommendations for the management of the river for the 2017 season. The conclusions and recommendations are therefore based on the review and consultation process I carried out independently of ESB.

2. Introduction

In late November 2016 details of the planned review were placed in a number of local Newspapers in Limerick and also posted on various social media websites (see Appendix 2). Information on the review also appeared in some of the national media.

I subsequently received 12 submissions or email contacts relating to the Review. Details of all of these are to be found in Appendices to this report. One person submitting a detailed submission asked that his name not be included with his submission when published. Two other submissions contained unsubstantiated comments of a personal nature that are beyond the scope of this report and have therefore been redacted/omitted.

In January 2017 I twice visited the Mulcair area and met with all of those who had provided submissions or indicated their willingness to meet and discuss their views on the management of the fishery and the overall catchment. I also held meetings with six other groups or individuals with an interest in the Mulcair River and these are also listed in Appendix 1.

On my first visit I arranged to meet with IFI staff and walked selected sections of the catchment. During my subsequent visit I visited other relevant parts of the catchment.

Many of the submissions I received were very detailed in nature and contain very positive and useful recommendations on the management of the Mulcair River. Some of the areas covered by the submissions are outside the scope of the review (impacts on salmon abundance from illegal fishing at sea, marine aquaculture, changing ocean conditions etc) but they do serve to remind us of the backdrop against which this review is taking place.

In the past, salmon from the Mulcair, if similar to other monitored systems along the west coast, are likely to have displayed marine survival rates from smolts to grilse of 25% to 30% . Currently survival rates for wild grilse in Ireland are generally in the region of 5% to 8% and the challenges facing these stocks are at times acute. We are fortunate in Ireland to have a very sophisticated annual scientific assessment of all wild salmon stocks which can inform the year on year management decisions and management actions. Decisions directly affecting angling on our rivers are now totally dependent on the accuracy of the in-season assessments made by the fisheries authorities of salmon adult and juvenile abundance. They are also dependent on accurate angling catch returns and any management decisions taken which reduces the intensity of angling can result in an artificial drop in the catch returns for a given system. The assessment of whether or not a river is open, open on a catch and release basis or closed, is based on a five year running averages of stock abundance. A fish

counter which is out of order for prolonged periods of time or situations where the rod catch diminishes due to a major drop in effort, can result in estimates of total return which have very broad margins of error and on a precautionary basis may result in the closure of a river or limitations based on catch and release. It is in everybody's interest that accurate yearly statistics are available to the SSCS so that where appropriate the rivers remain open to angling.

In the following section I've listed out the main areas of concern arising from the submissions and from my various meetings. I've included at the end of each section a number of recommendations relating to what I believe to be desirable management actions.



3. River Mulcair – current issues and management actions

3.1 Protection

As outlined above, ESB has engaged IFI to provide protection services on their behalf, on the River Shannon. From the submissions received and through discussions with the various interested parties, there was a clear level of dissatisfaction with the level of protection on the Mulcair River. It was obvious that local IFI staff were held in the highest regard, but were seen to be very curtailed in the time they could devote to protection work on the Mulcair River. There was also a clear perception that these constraints greatly reduced IFI's ability to provide an adequate level of protection to areas where significant numbers of adult salmon were holding in the main channel. There was also concern that protection of the spawning streams and the upper reaches of the main rivers was inadequate and that these areas were subjected to, at times, quite significant levels of winter poaching.

The submissions also contained complaints that IFI are unwilling to cooperate with locally appointed water keepers and disappointment that they are not in a position to follow up on intelligence provided by such water keepers and also by members of the committees of angling clubs or information from individual anglers.

Over the years the number of protection staff employed on the lower Shannon, including the Mulcair River, has diminished and the views expressed in the submissions reflect a longing for this level of protection to return.

When questioned on the above the contributors accepted that they had no way of knowing the level and frequency of IFI patrols in the catchment. Many of those I spoke to were unaware that kayak-based patrols were taking place and also unaware of the protection of the spawning streams undertaken by IFI on a rota basis throughout the winter. Effective protection is often covert and cannot by its nature be discussed openly, even with those it is designed to support and serve. What is clear is that the anglers clearly see a need for more overt surveillance of day to day angling and angling methods, which as outlined below I would see more as part of normal fishery management, rather than classic protection work. I would agree that a heightened and more visible level of surveillance on the prime angling stretches is required.

As also discussed below, there is a clear confusion in the minds of those offering submissions in relation to the role of IFI as it applies to protection and the fisheries management role, which ordinarily would complement protection and surveillance. Neither IFI nor ESB currently fulfil the classic role of Fishery Manager, which would include day-to-day encounters with those fishing on the river whether they are locals or visiting anglers and the day-to-day oversight of fishing regulations.

3.1.1 Recommendations – Protection:

- 3.1.2** IFI need to redouble their efforts in appraising stakeholders of the level and intensity of protection on the Mulcair – accepting that the level of detail which can be provided to them will be limited.

3.1.3 Efforts should be made to react as quickly as possible but in proportion to available manpower and resources, to third party reports of poaching.

3.1.4 Anglers should continue to log and to report any illegal activity or pollution incidences they may witness and to make full use of the IFI Emergency pollution and poaching hotline.

3.1.5 IFI should consider how best to work with locally appointed water keepers to ensure optimum use is made of voluntary efforts to protect the river, both in relation to poaching and incidences of pollution and habitat damage / destruction.

3.1.6 Recommendations contained in the submissions suggest the insertion of anti-poaching devices in some of the pools where poaching consistently takes place in the middle and upper catchment. IFI should discuss these suggestions with the relevant parties and see if appropriate action can be taken.

3.1.7 Anglers should accept that in a situation where priorities must be assigned, with limited staff, IFI may well choose, quite appropriately, to assign staff to combat large scale poaching, rather than dealing with day-to-day breaches of angling rules, annoying and frustrating as they be for those witnessing same on the river bank.

3.1.8 Any anglers caught fishing illegally should have their ESB- issued permit withdrawn for the season. If they are subsequently caught fishing illegally they should lose their ESB permit for 10 years.

3.2 Stock Assessment

Fundamental to the annual assessment of salmon runs and the overall assessment of salmon stocks in the Mulcair is the accuracy of the IFI operated 'Logie' fish counter. In recent years the fish counter has been out of operation for two full seasons (2011 and 2012) or for periods during the year. As a result estimates of salmon stock abundance were dependent on non-sequential data / estimated data which understandably creates a lack of trust in the fish counter results and the contribution which it makes to the five year running averages, used to assess the status of the Mulcair salmon stock.

In addition to the day to day functioning of the counter *per se*, it is important that the efficacy of the counter is known under various water height / water flow rates. A standard procedure is normally followed to validate and verify counters, such as the Logie, on several occasions throughout the year. It is advisable that this process is carried out by technical staff not normally associated with the running and maintenance of any particular counter. The availability of data relating to these aspects of the counter would go a long way towards reassuring the stakeholders that the counter was functioning effectively and indicating the level of accuracy of the counts recorded under a range of seasonally variable, environmental conditions.

3.2.1 Recommendations - Stock Assessment:

3.2.2 As a top priority the fish counter should be fully functional throughout the year.

3.2.3 An independent process of verification and validation should be undertaken on the counter by expert technical staff, twice to three times a year, under varying water height and water flow rate conditions.

3.2.4 Concern was expressed that salmon were finding it difficult at times to ascend the fish pass / weir at Annacotty. This observation should be assessed over the coming season and if found to be valid, a short-term acoustic tracking study could be carried out to gauge the severity of the problem and appropriate action taken to eliminate any blockage. If required this work could be carried out as a Mulkear AfterLife project.

3.2.5 Rod catch returns are vitally important and indeed fundamental to the assessment of the stock status of salmon. It is little appreciated that anglers, due to a lack of interest in supplying rod catch returns, may themselves be partially responsible for the closure of rivers or the curtailment of angling on rivers. All clubs should, as a priority, advise club members on the importance of their catch returns and, where appropriate clubs might consider prizes or other incentives to promote the collection of accurate catch and effort data. A range of clever apps are currently under development and some of these will make the collection of such data far less onerous and far more fun! (see refs below).

3.3 Local Management Actions

As was said to me during my discussion with contributors to the review: “.....*nobody in Limerick wants to be responsible for killing the last white rhino!....*”

I was very impressed with the passion and commitment of all of those who spoke to me over the past month and I fully accept their *bona fides* in wishing to conserve and manage stocks, while at the same time looking towards a time when normal salmon angling rules will apply on the Mulcair.

Having examined in some detail the Long Field section of the river I must agree that it is wholly unsuitable for fly angling. It is also the case that in rivers, salmon, and indeed salmon redds, are not evenly distributed. In each catchment you will find distinct and disproportionately important holding and redding areas. The Long Field comprises one such area in the Mulcair catchment. While I would agree that spinning, with a single barbless hook, should be permitted in this area for the 2017 season, a repeat of the many incidences of un-sports-man-like behaviour and fishing for the pot / commercial fishing witnessed along this stretch in the past, should be dealt with swiftly. Club members and visiting anglers must play their part in ensuring that the angling regulations are strictly adhered to. However, if such behaviour is persistent and serious in nature, a bye law should be enacted to close this area to angling and on conservation grounds and have it designated as a sanctuary zone. Some years ago this approach was very successfully taken on a stretch of the Black River, one of the tributaries of the Burrishoole system, Co Mayo.

3.3.1 Recommendations - Local Management Actions:

3.3.2 The fly only rule should be lifted for the stretch of the Mulcair from Brown's Weir to Kishyquirke on the left bank and Garrymore on the right bank, to be replaced by a spinning and fly fishing rule, stipulating single barbless hooks only.

3.3.3 Clubs should be proactive in ensuring that all of their members are familiar with the recommendations relating to catch and release and links to educational videos on this technique should be widely dispersed by means of websites and other social media (see refs below).

Once the Mulcair opens to the normal catch and kill regime:

3.3.4 On a voluntary basis all anglers should be asked not to kill salmon larger than 75cm / 30 inches in length (approximately 10lb). This will help to conserve Multi-Sea-Winter salmon stocks.



3.4 Clubs and Individual Anglers – Permit Prices

I have carefully reviewed the cost of the permits and the concessions available for club members, OAPs and juvenile anglers. If the recommendations contained in this report are followed I see no reason why the prices charged in 2016 should not remain at the same level for the 2017 season.

Every effort should be made to encourage more visiting anglers to fish the Mulcair for salmon, particularly visiting trout anglers.

3.4.1 Recommendations - Permit Prices:

3.4.2 For the 2017 season permit prices should remain as they were in 2016.

3.4.3 Target guest houses, tackle shops and tourist outlets with specific information for the visiting trout angler, encouraging them to take out a day or a weekly ticket for salmon fishing on the Mulcair during their stay.

3.5 The Salmon Factory

The topography of the Mulcair catchment is such that its many tributaries and smaller streams quickly divide into a myriad of fingers. Based on a rolling sandstone gravel base this *salmon factory* has the potential to produce large numbers of salmon fry and parr. Despite the extensive and unnecessarily damaging arterial drainage of the main channels, this upper catchment has ensured the fast recovery of the salmon stocks. This recovery was complemented by the impressive river bed restoration programme carried out under MulkearLife. Given the current concerns over changing climate and the rush to re-drain rivers, in an effort to ward off its worst effects, such as flooding, every effort should be made to ensure that the Mulcair is not subjected to any further drainage schemes, as the resilience of the system has already been tested to the limit.

Thanks to the exceptional work carried out under MulkearLife and the continuing work under the Mulkear AfterLife Scheme, there is available a wealth of valuable background data on the upper catchment. It is vitally important that day to day fisheries management and protection work on the mainstream and its tributaries is complemented by a well planned programme of works in the upper catchment. Such a programme would monitor the streams, to ensure that blockages are removed and that any development in these areas, (such as agriculture, forestry etc) is carried out in sympathy with the needs of these spawning streams. Schemes are now available to train local volunteers in managing such smaller streams (the “adopt-a-stream” approach). A link to the details of the Atlantic Salmon Trust, Small Streams Characterisation System is provided in the references below.

Under the various community programmes carried out to date, excellent relationships have been forged with the farming and forestry communities in the catchment and it is vitally important that these are maintained and strengthened. The overall good to excellent water quality found in the catchment, despite its relatively close proximity to a major city is a unique and highly valuable asset. The coordination of the local community sectors, the two local authorities and the State agencies which has brought this about is impressive and this approach is particularly important in

safeguarding the more remote and often pristine watercourses. A recent study in University College Dublin had shown that over 70% of the biodiversity of many rivers in Ireland is held in reserve in fishless, 1st order mountain streams.

During the course of my discussions, several items were highlighted that need attention in the upper catchment. These included reducing the effects of tunnelling and also issues related to curtailing increasing levels of silt in flood waters on the river. There was also concern that silt was gathering at the mouth of the Mulcair River where it entered the River Shannon and forming a major silt bank which impedes fish passage. This bank is clearly visible from Google Maps. These issues need to be addressed and action taken to reduce the level of silt erosion from the catchment and the increase in water discolouration which mitigates greatly against fly angling during dropping floods and may pose a risk to redds and juvenile salmonids.

3.5.1 Recommendations The *Salmon Factory*:

3.5.2 Guard against efforts to carry out any further extensive arterial drainage schemes in the Mulcair or any of its tributaries. Other far more effective and long-term techniques now exist to mitigate the effects of flooding and these should be exhausted before any re-drainage of the previously drained channels is considered.

3.5.3 The upper streams of the catchment form a unique resource and consideration should be given to designating the key spawning and nursery zones as *sanctuary areas*. They should be afforded special protection, on conservation grounds, by means of a specific bye-law.

3.5.4 The smaller streams should be walked and mapped and a programme of de-tunnelling / barrier removal agreed and implemented (see an example of such a programme in the references).

3.5.5 A survey should be carried out on the sources of siltation in the river and a review undertaken of the silt bank which is in danger of blocking the mouth of the River Mulcair, where it enters the River Shannon. This work might also be undertaken as a Mulcair AfterLife project.

3.6 Invasive species

Extensive work has already been carried out in the catchment to reduce the level of terrestrial invasive species, particularly the giant hogweed and Japanese knotweed. Efforts are also afoot to deal with the influx of Himalayan balsam and pheasant berry along the banks of the river. Within the river itself concerns have been expressed to me in relation to the upstream movement of dace. My enquiries would indicate that dace were present in the Mulcair during the 60s, when the Inland Fisheries Trust carried out some test fishing for the species in the vicinity of Annacotty. Dace are proving problematic not alone in the Shannon system but also in the bigger river systems of the south, such as the Barrow, Suir and Nore. It would appear that climatic conditions are such that dace are thriving and the abundance of this species is increasing. It is unlikely that the middle and upper reaches of the Mulcair will provide an ideal habitat for this species in the medium to longer term, but every effort should be made to monitor the progress of dace stocks throughout the catchment and its potential impact on salmonids, both salmon and trout.

3.6.1 Recommendations - Invasive Species:

3.6.2 Continue work to eliminate bankside invasive plant species and to stabilise banks.

3.6.3 Monitor the progress of dace upstream and assess the impact of the species on the feeding of juvenile salmonids: trout and salmon. In the future, the impacts from invasive fish species, such as the dace, could intensify. It is important to have background information on the feeding patterns and general biology of these species at this point in time. Such work could be undertaken by third level students, both at undergraduate and post graduate level.

3.6.4 In removing barriers, take into account the likely impacts this might have on the upstream colonisation of the feeder streams by dace.

3.7 Fishery Management of the Mulcair River

The salmon and trout resource of the Mulcair River and its tributaries is a valuable national asset. As outlined earlier, it would appear to me that despite the determined efforts of ESB to support the fishery, there is currently a gap between the protection services provided by IFI and the requirement for a responsive, professional fishery management structure which would focus on the angling resource and the overall “bank-side”, day to day management and conservation of the fishery. The current fraught relationships between the various players involved with angling in the Mulcair catchment is likely to continue unless they have a clear and reactive management structure which they can share in and support.

The formation of the Mulcair River Fishery Partnership a decade ago was an excellent initiative and many of its original objectives are valid today. However, the move towards an integrated catchment initiative and the subsequent MulcairLife Programme may have deflected attention away from the fishery management requirements of the system. In my view this now needs to be refocused and built around a modern, professional, fishery management structure and approach.

In the past, finding a consensus amongst the angling interests on how best to manage the Mulcair fishery proved very difficult and divisive. To overcome such issues I recommend that responsibility for the management of the angling resource should be devolved to a modern, Fishery Co-operative structure, where all members of the Co-operative would, on a shared basis, play a full and active part in deciding on management policy and implementing an appropriate funding model. All parties would contribute to the establishment and running of the Co-operative. The Board of the Co-operative should employ a professional Fishery Manager and may also need to consider employing some part-time seasonal staff to carry out bank maintenance, permit checking etc.

The Board of the Co-operative could, for example, comprise ESB, the local angling clubs, IFI, local tourism interests and the local IRD company. The Co-operative would have a clear focus on the angling resource and its development. All other aspects of the work of the fishery co-operative would remain secondary to this goal.

The resourcing of a Manager and possibly a part-time staff member or two, would be challenging. All members of the Co-operative would have to contribute to funding and running of the Co-

operative on a shared basis. In my view this would be the best strategy for achieving the developmental potential of the fishery.

Overall protection would continue to lie with IFI but as warranted officers, the manager and his volunteers/staff would be in a prime position to deal with day to day breaches of the angling bye laws or rules governing the fishery. Such an initiative would leave the fishery manager free to concentrate fully on developing the potential of the Mulcair as a prime salmon and trout fishery, while coordinating the other initiatives, based around the use of the river by the wider community for other recreational or educational activities. The manger could also initiate and run training events for juvenile anglers and adults: angling techniques, casting techniques, fly tying, water safety, watercraft courses etc.

My task was to review the management of the Mulcair River and my comments above deal with that catchment alone. The Co-operative structure, as outlined above, would be more appropriate and easier to support and finance, if it covered the Lower Shannon Angling Fisheries and encompassed both the main stem fisheries at Plassey etc and tributaries such as the Mulcair, Kilmastulla and perhaps the Nenagh River.

Several fine examples of fishery co-operatives exist: for example on the Ballysodare River, County Sligo and the Glenisland Co-operative on Lough Beltra in County Mayo, largely funded by boat hire, season tickets, and visitor permit fees from the fisheries.

3.7.1 Recommendations - Fishery Management of the Mulcair River:

3.7.2 To establish a modern, professionally managed Mulcair Fishery Co-operative as outlined above.

3.7.3 The Mulcair Fishery Co-operative to employ a fishery manager and some part-time / seasonal support staff.

3.7.4 To devolve to the Board of the co-operative responsibility for the management and development of the angling fishery on the Mulcair River.

3.7.5 To work closely with IFI to ensure the protection of the fishery and its aquatic resources.

4. The Wider Community

During the course of this review I sought to develop fishery management options for the Mulcair River. However, it is obviously difficult and perhaps somewhat artificial, to separate this out from the role of the river within the wider community. The work done in developing the various catchment management initiatives within the Mulcair River is exemplary and has shown the way forward for many other similar projects around the country. With the recent establishment of LAWCO (Local Authority Waters and Communities Office), there is a renewed interest in developing links between river catchments and those living locally. There is currently a unique opportunity to marshal support and funding for the overall conservation and management of the wider catchment and to involve wider catchment interests.

One of the submissions I received makes a very powerful plea for us to remember the social role which river catchments can serve in supporting the underprivileged and less fortunate in our society. The work of my good friend Des Chew, with the Dublin Angling Initiative, is a fine example of what can be achieved in this regard with a modest level of resource and limitless enthusiasm and commitment.

I very much welcome and encourage any other initiatives based in and around the Mulcair catchment but as I outlined above, it is my belief that separating out the needs of the angling fishery into a separate, self-managing, self-funding structure is essential, if the potential of the fishery is to reach fruition. A professional, carefully established and modern Fishery Co-operative could be an invaluable support to the wider catchment interests within the Mulcair River system.

5. Conclusion

There are few catchments in the country that are underpinned with such an abundance of detailed catchment information and a broadly based wealth of enthusiasm and commitment to the conservation of their local river. All of the ingredients are in place to make the Mulcair River one of the finest and well run salmon fisheries in Europe, provided the various fishery interests can agree to pull together in one unified direction!

Ken Whelan
15th February 2017



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References

Anon **MulkearLife Publications:**

- **Enhancement of Atlantic salmon populations and biodiversity considerations of habitat restoration in SACs**
- **Mulkear Management Plan: restoration of the Lower Shannon SACs (Mulkear River)**
- **Management of riparian zones in SACs, with particular reference to the management of non-native invasive plants**
- **Management guidelines for European otter (*Lutra Lutra*) in SACs**
- **Guide to sustainable water management and farms in close proximity to SACs**
- **Layman's Report: restoration of the Lower Shannon SAC (Mulkear River) - for sea lamprey, Atlantic salmon and European otter**
- **Management of upstream passage for adult sea lamprey in SACs**
- **AfterLife Conservation Plan**

Anon (2013): **The Shannon Fishery Partnership: Annual Workplan 2013 and end of year report 2012**

Anon (2014): **The Shannon Fishery Partnership Annual Workplan 2014 and end of year report 2013**

Anon (2015): **Getting to know Lough Derg** - the Lough Derg Science Group, Castlough, Portroe, Neenagh, Co. Tipperary

Whelan, K (2015) **Survey of the Mountain Water, Co Monaghan: Phase 1: Recommendations for the Management of Marginal Vegetation (Tunnelling)**, River Blackwater Catchment Trust, Commissioned Report. 22 pp.

Useful Hyperlinks

Collecting Catch and Effort data: <http://fishfigure.com/>

AST, Small Streams Characterisation System: <http://www.atlanticsalmontrust.org/small-streams-course/>

Catch and Release instructional videos: <https://www.youtube.com/playlist?list=PLXsDg09-APY7hX9W5F8HA9FoiJg2FiSe>

The content of these submissions are personal to those making the submission and do not reflect the views, nor are they endorsed by the author of the report Ken Whelan or ESB. Responsibility for the accuracy and/or validity of the information and views expressed therein lies entirely with the individuals making the submissions. Where requested, personal detail has been withheld from the submissions. Likewise, unsubstantiated comments of a personal nature, that are beyond the scope of this report, have been redacted/omitted.

Appendix 1 – Submissions

Submission 1 – Newport and District Anglers

1. Salmon that lie for long periods in the main holding pools on the lower Mulcair need to be protected from over fishing by rod and line. The angling effort allowed on those holding pools need to be reviewed in an effort to maintain a sustainable stock.
 2. Fly only areas already established on the Mulcair need to be maintained and rules and regulations associated with the fly only area properly implemented by protection staff. The introduction of a fly rod only to be carried by anglers on this section of the fishery should be introduced.
 3. The deep at the waterworks upstream of the Burn Mills on the Newport river and Burke's Flats on the Mulcair river at Boher because of their remoteness and the frequency of poaching by netting at those two areas may benefit from some anti netting snags being installed
 4. Rules to stop the removal of Brown Trout caught while salmon fishing should be printed on the salmon permits.
 5. When a catchable quota is established on the fishery spring salmon should be exempted from any quota for a number of years to allow stocks replenish September should be either closed to salmon fishing or fly only catch and release on the entire fishery for the month to preserve stocks.
 6. Rules and regulations already associated with the salmon permit should remain firmly in place.
 7. A cut off point should be established on the upper river above which no angling would be allowed to protect juvenile salmon and trout on the feeder streams.
 8. A study should be carried out at Annacotty weir to ascertain if late running salmon are able to negotiate the weir as visual observations would suggest that a large quantity of stale or red backend salmon are failing to ascend this weir.
 9. Where an on the spot fine is issued for any angling offence the E.S.B permit of the offending angler should be revoked.
 10. A review of protection throughout the entire fishery needs to take place with special emphasis given to protecting salmon in both the holding pools and spawning beds from poaching by netting and spearing.
- Finally to conclude no review of salmon within the Mulcair river could be complete without a review of the lower Shannon fishery from Thomond Bridge to the Mulkear outflow.

Fergus Hogan

Hon Secretary

William O Neill

Hon Chairman

Newport and District Anglers Association.

Submission 2 – The Shannon, Mulkear and District Anglers

The Shannon, Mulkear and District Anglers Association (hereafter referred to as “The Association”) is grateful for the opportunity to make a submission to the Mulkear River Review. The committee of The Shannon, Mulkear and District Anglers Association met on the 6th of December 2016 and we have agreed what is a representative position of our membership and our association. This position has been arrived at over the last two years and reflects members’ representations at the A.G.M. 2015 and 2016 and committee meetings. Indeed we communicated this position to Noel Greally, Manager, Fisheries, Property and Assets Recovery, E.S.B. fisheries on the 18th of November 2015. I have included the club’s position on the change the fishing methods allowed from the top of Scart (“The Bicycle Hole”) up to Kishyquirke on the left bank and Garrymore on the right bank which was imposed for the 2016 season.

The Association's 2015 A.G.M. prioritised the return of the fishery to one that is managed with the issuing of tags, as it had been managed with up to then. Angling reports for the 2016 season are that salmon runs were very significant this year. It has been reported at committee meetings that numbers of genuine salmon anglers fishing the system has diminished since the introduction of catch-and release. It is the position of The Association that genuine anglers on the bank are effectively policing and protecting this very valuable and fragile resource; a return to issuing tags, as appropriate, would encourage the genuine local angler, who may not catch a salmon in an angling season, to engage again with salmon angling on the Mulkear river.

The Association acknowledges the E.S.B.'s special concession (a 30% reduction) on permit prices for 2016 and will be very appreciative of a similar arrangement for the 2017 season.

Fishing methods allowed from the top of Scart ("The Bicycle Hole") up to Kishyquirke on the left bank and Garrymore on the right bank were changed for the 2016 season. Previous to the 2016 season the stretch from Ballyclough up to the top of Scart ("The Bicycle Hole") was a fly fishing stretch. Extension to this fly fishing stretch includes a major section of river that holds salmon in low water conditions during the summer months. This section is a very important section for spinning on the Mulkear for local and overseas anglers. The Association is of the position that, as a compromise, the stretch from Brown's Weir to Kishyquirke on the left bank and Garrymore on the right bank be returned to angling with a single barbless hook for spinning; this stretch is a very slow moving and deep section of the Mulkear and is thus not suitable water for fly fishing.

The Association requests that extra funding be made available to the I.F.I. for the explicit purpose of protecting the spawning beds at night-time on the upper reaches of the Mulkear river system during November and December 2017. Our association made available monies to cover our club water-keepers expenses during the 2008/2009 seasons. Salmon anglers enjoyed the best season in many years in 2012 and it is the view of our club that this was directly attributed to by the protection that the spawning beds received in 2008/2009. The water-keepers were present on the system at night-time during November and December and word went around the communities to the extent that poachers were reluctant to engage in their yearly activities on the spawning beds. We look forward to a positive decision on this issue and would be extremely appreciative if the E.S.B. would consider this spawning bed protection initiative. It is the view of The Association that salmon numbers returning to this system will significantly improve if this protection is provided on nights in November and December.

The Association has concerns regarding salmon passage through the Annacotty Weir. In higher water, salmon tend not to use the fish pass in the centre of the weir and as a result may take several attempts before successfully passing over the weir. This problem is compounded by rubber mats placed on the weir to aid lamprey eel passage; salmon are attracted towards parts of the weir where these mats are installed; these mats are not designed for salmon passage; salmon are seen to tire and damage themselves as they unsuccessfully try to negotiate the weir where these mats are positioned. The Association requests an investigation into salmon passage at the Annacotty Weir; we request that The Association be consulted so that we can provide appropriate input to this investigation.

The Association would like to thank the E.S.B. for installation of new styles from "The Long Field" up to Boher. The Association requests that the stretch of river bank from "The Meetings" to Boher be appropriately cleared of vegetation as it has become extremely difficult to fish in recent years; this would complement the new styles that were installed at significant cost and would lead to a further improvement to this stretch of river.

The Association would appreciate consultation on any other issues being considered by the Mulkear River Review with a view to making a constructive contribution to recommendations under consideration.

The Association is grateful for the opportunity to make a submission to the Mulkear River Review and we look forward to the recommendations made by this report.

William O'Halloran, Secretary

Submission 3 – Limerick and District Anglers

(Following this submission I met with Eoin Brockett for a detailed discussion. Subsequently I was informed that the Limerick and District Anglers had elected a new Committee and I met with Kevin Hannan and Noel O' Donnell representing the club)

In response to your recent add in the paper we at Limerick and District Anglers Association would like to submit the following. Just to give you a background we are the biggest and oldest club in the region established in 1939 and with more than 300 active members. We have been in dispute with both ESB and IFI since 2014. [TEXT REDACTED] It seems he [the ESB Fishery Manager] would rather work against our association than with us and has we feel done irreparable damage

to angling in the region since his appointment as fishery manager. Given he has no background in fishery management or fisheries for that matter his decisions have had a devastating effect not just angling but also on ecology of the river. We hold him solely responsible for the spread of the invasive species dace to the upper catchment. You know the effects these fish have on the indigenous fish species. The removal of Ballyclough Weir without an AA or an EIS or even planning we feel was an act of environmental vandalism. Even the rock ramp that was supposed to be installed as part of the project never materialised and responsibility for this lies solely with the ESB given their statutory obligations to the river.

The same ESB Manager increased the permits to fish the Shannon and Mulkear by a staggering 150% in the middle of the worst economic recessions this country has ever seen. This in a region that to start with had a high unemployment rate. Pensioners and unemployed struggled to cover the permit increase and ESB Fisheries priced a lot of the most vulnerable in society off the river. Minutes taken by the ESB of the now dissolved Mulkear Partnership stated at the time that it was an ESB fisheries decision. While in a letter to our treasurer two years later the ESB Fisheries Manager stated it was the anglers that requested it. If you would like a copy of both documents, we can forward on the same.

Nonsensical rules introduced by the same ESB Fisheries Manager to put anglers off the river are another bone of contention with the association. Fly only stretches introduced on what anglers would describe as flats or bait water shows the man's incompetence. Not happy with that he destroyed the aesthetics of the river bank with unsightly road type signs every ten meters. These fly only stretches were introduced in one of the few areas favoured by elderly and juvenile anglers due to their ease of access and safety. These areas are it needs to be noted one of the few places where styles were introduced to help the aforementioned. The same ESB Fisheries Manager proceeded with these actions despite protests from the only two angling clubs on the river.

In 2014 ESB Fisheries committed to go into arbitration with the association at the request of the then Minister. The fisheries manager as is his form has failed to honour this to date. We have reiterated our commitment to this on several occasions to no avail.

How the fishery should be run is a qualified external independent fisheries manager needs to be appointed and a complete review of both the Mulkear and Lower Shannon needs to take place. This newly appointed manager needs to work with both clubs in the region to find solutions to the mess the current fisheries manager has created through his authoritarian fly by the seat of your pants /kick the can down the road approach. A structured approach needs to be adopted with a genuine commitment from the ESB that they are willing to work with us would be a start. The consolidation of the Shannon and Mulkear permits as of old and a reduction in price needs to take precedent. Removal of the fly only stretch in the flat water in the long field is essential. The Lower Shannon also needs to be addressed as part of this process.

We would like to point out we are still willing to go through the arbitrary process and feel the best option as commitments made would have to be honoured and all parties can move forward for the current stalemate situation. Our committee would be more than happy to engage with you and should you wish to have a walk down of the river to familiarise yourself with the same we can accommodate you. You can contact the Associations secretary anytime on [REDACTED]. We look forward to hearing from you and are hoping we can all move forward in a collective and cohesive manner.

Limerick and District Anglers Committee

Submission 4 – An Interested Angler

(Personal details and brief bio provided. These were omitted at the request of the angler making the submission)

SUBMISSION

When I started fishing a tributary that flows by our land in about 1954 the river was teeming with fish (Salmon Trout Eels Minnows Sticklebacks and all types of water life) and water birds were very plentiful (Dippers, Kingfishers, Mallard, Waterhens and many more) and yet the cattle had to stand in the river during the summer months to keep away from the gad fly and the Co Op used to wash out the milk tanks at about 3pm every day turning the river white for quite a time and yet we had fantastic fishing !!

Today that has all changed we get the odd run of a few salmon , there are very few trout and 'Gravlin' and the minnows and sticklebacks are seldom seen a sad state of affairs

Why?? What has changed ??

Well quite a number of changes have taken place

1) The Atlantic hazards have increased due to

a) Illegal trawler fishing . One can google off our coast and see Russian factory ships hovering up all fish and we just watch them !

b) Our smolts (many small and weak) going up the west coast are hit with massive numbers of sea lice and disease from fish farms in Galway bay. We are told this does away with 39% of them. There are all sorts of other views that may add to what we can control

c) Farm fish that escape follow the wild fish up their river and at spawning time can alter the genes of the resultant fry

2) In the river there are a lot of problems. Lets start with the returning fish

a) Mouth of river netting. Our government rightly banned this at a cost of over 30 million euro. This worked for the first season but then the professional poachers took over as they saw good money to be easily got and so the numbers fell back to below what they were before the ban. This can and must be changed

b) Water pollution due to inefficient or non existent Local Authority sewage systems (43 nationally with no attempt to purify) and still a little agricultural pollution but this has reduced enormously. This can be put in order by the local authorities

c) The introduction of a non-native species to our country side MINK some due to escaping but many by people intentionally letting them out of their cages . They Kill for as long as they are able and are wiping out river bank nesting birds and upset the spawning grounds. and killing off flocks of farmyard hens. We are all working to eliminate the plant invasive species but we won't touch the mink which is doing massive damage

d)When the fertilized eggs hatch they need food. Most of this comes from fly larvae. They need green cover , usually Ranunculus and they both need direct sunlight !! Many of the tributaries below the spawning beds are completely closed in or TUNNELED thus there is no food for the young fry. I did my best to persuade the Mulcair Life management that if we want a higher level of survival and a stronger smolt heading out to sea we MUST DETUNNEL It took until the last year to get a small bit of action !! This is greatly reducing both trout and salmon numbers

e) The evergreen trees being so close to the river are increasing the acidity of the river water due to the pines shed from the evergreen trees. I have seen one place where the water actually flows under a forest tree !!

I believe that we can increase our wild salmon numbers by managing our wonderful fish correctly. There is a lot we can and must do if we are to stop the wild salmon from becoming extinct !!

My proposals are

The key words are Cooperation and Communication

1) Management . Get genuine experienced staff who have knowledge, commitment and the will to drive through the red tape to save our salmon

2) Stop professional poaching by action not word

3)Protect the spawning beds from man and mink

4) Detunnel considerable areas on each spawning tributary

5)Keep up the watch on pollution and ensure that ALL local authority waste entering our waterways is fully and effectively treated.

6) A cooperative attitude to a working relationship with land owners to save our salmon by working together to prevent pollution. Stop todays attitude of wanting to fine or jail them and so making enemies of them. Together we will succeed

7) Let the fish up the Mulcair by either removing or shaping the now big bank at the mouth of the Mulcair where it enters the Shannon. (A few of us met ██████████ on site and it was agreed that action was needed but we all felt that there would be opposition in case a few lamper eels were disturbed!!) We have to decide which is more important The survival of our native wild salmon or the mysterious Lamper eel?

8) Prevent contamination of the MULCAIR salmon genes by escaped fish from salmon farms

9) Reduce loss at sea due to disease and sea lice by preventing any more salmon farms being put anywhere near the smolt run in the sea to their feeding grounds and protecting our sea waters from foreign trawlers hovering up every species and every size of fish and throwing back any they don't want dead, while our "navy" are in the Mediterranean allowing these raiders free passage to do what they like !

10) Rules such as catch and release and fly fishing only are good and unfortunately seem only to apply to the genuine fishermen who want to increase salmon numbers and enjoy fishing as a sport. These rules must be supported by effective fish protection so it is shown to be effective in helping the main objective

Separate to the above the fishermen must work to sensible rules. The genuine fisherman will be delighted to follow them. Unfortunately there are some who think the only good salmon is in the deep freeze and don't know the life cycle of the salmon and don't want to know !! The salmon needs protection from them too as in some cases do the genuine fishermen!

Consideration should be given to the UK trust river management system with a separate cooperative system is set up on the river where all are involved from hatching to protection to the fishermen it works in Tyrone and would work here is given the right leadership . Limerick Co Co is now setting up such a scheme on the Mague catchment area.

The setting up of a Co Op to be in charge of the river with support from the Dept and the ESB should be investigated

I hope this submission is of some help and be thought provoking but genuine action is ESSENTIAL if we are to save our wild salmon on the Mulcair. I send it on behalf of the Mulcair Co Op , genuine anglers and landowners.

I would request that my name be omitted from any publicity

Submission 5 – John O ‘Connell

My name is John O Connell and I have a local business with a staff of 50 persons.

I have fished the Mulcair for over 20 years and have gained some sizeable knowledge of this area.

I would like to make some brief points that I hope will help you on your final report. There was a single permit for the Lower Shannon and this included the Mulcair @ 65euros this was split into two permits in the height of the recession and is now 100 euros per permit. This was the start of the wrong doings to the anglers and forced a lot of OAPs and young anglers off the river as they could not afford this massive hike in the price bearing in mind you also have to buy a state licence. Then in 2016 there was a farcical ruling to put a section of the Mulcair i.e. the Long field a fly section only.

This section has very high banks and is totally in accessible as the area is totally overgrown. Three years earlier from Brown’s Weir was made fly only with a lot of objections and is now also in accessible but fell on deaf ears. Please bear in mind the Mulcair is the only place on the lower Shannon that people OAPs , young children and people with disabilities have some easy access and this was taken away as a lot of the said persons could not fly fish. The season gone 2016 we lost the majority of anglers to this fly ruling and that was sad to see all the people friends old, young and especially the people with special needs. The Mulcair has a healthy run of Salmon and the main run of fish go over the weir in October to December and I have witnessed over the years and including this year for some weeks hundreds if not going into thousands of fish travelling. When you give your final report please bear in mind the persons mentioned who are personal friends and spend the day sitting down having a cup of tea on the river bank and a sandwich talking about the days gone by and this was their only outlet from the everyday pressures of life and live for the season to open . Quoted in an ESB book the rod man does no damage it’s the illegal netting and poaching is where the damage is done. When there were young children fishing the Mulcair they enjoyed the stories of old and you could see their enthusiasm and the excitement on their faces . Please bring this back for all concerned. I will sign off now and for the sake of all the persons mentioned please revisit this farcical ruling and bring some enjoyment back into the lives of the old and the young as we seem to have lost this through ignorance or arrogance. If you need any assistance please do not hesitate to contact me for the sake of Angling.

John O ‘Connell

Submission 6 – John O Connell and Colleagues

(A second submission from JOC and colleagues, received in the post)

On reading your article on the local media newspaper, we the undersigned feel that as a group of anglers who may have fished this section of the Mulcair for generations, we need to bring to your attention some very serious issues. The River Mulcair over the years has seen huge changes in rules and regulations from all organisations and some of these changes are farcical. In 2016 the Mulcair was made fly only, from the Long Field down to Brown’s Weir. This section is totally overgrown and has high banks and cannot be fly fished and large sections. This fly only rule has seen all of the OAPs, the old and the young, stop fishing, as they cannot fly fish this section.

The River Mulcair in the last several years has seen a dirty muddy colour coming right down through large sections, originating from further up the river system, so if someone is physically capable of fly fishing they cannot do so, because of this dirty water, which stagnates in slow flowing water.

Also three years ago another section was made fly only from Browns Weir. This is now in a total overgrown state and left open to all sorts of poaching. The fly section on the Mulcair is now miles long and has stopped the most vulnerable people, the old, young and people with disabilities from fishing this section, as they cannot fly fish. These are people we need to get back on the river to enjoy their lives and pass on the knowledge they have gained to the younger generation. Also note the Mulcair section is the only section on the lower Shannon that has easy road access for the said persons mentioned and is a spate river. Please see below the names of anglers that fish this section.

John O ‘Connell and colleagues (letter signed by 7 individuals)

Submission 7 – Neville Atkinson

I am delighted to see an independent analysis and assessment of the Mulcair river system being sanctioned by the ESB.

I have had a long association with the Mulcair river system from a young age. Born in Cloughjordan, Co. Tipperary, I traveled with my father, Canon Donald Atkinson, down to the Mulcair for many years fishing for salmon. Being a spate river, we would travel down when the water levels were suitable and we got the 'call' that the water level should be right.

At this time which was the late 1980's the river was teeming with salmon when the conditions were favourable. Anglers were plentiful and many fish were harvested and many sold in and around Limerick city from the 'Honda 50 brigade' who would line the 'long field' stretch of the river in Scart and beyond. Everyone got on and new friendships were made with people from all walks of life. Memorable times - I remember distinctly catching my first salmon in the weir stream in Scart at this time.

The eldest anglers would refer back to the good old days and the prolific runs of both grilse and salmon that would run the system in days gone by - back in the 50's, 60's & 70's.

Protection on the system was well organised and there were ample staff to monitor the passage and safety of the fish. Remains of bailiff huts can still be seen at several locations - notably under the bridge on the Newport Mulcair above Newport village.

As I moved away to college and started my working life my trips to the Mulcair reduced significantly. On the times we did visit, the river was evidently lacking funding and management. The styles and foot bridges were in poor repair and the banks more overgrown. The river was receiving less anglers but those who did fish it (mainly city anglers) were spending more time on it when conditions were favourable.

At this time I linked up with those whom I knew involved in the angling clubs and questioned what was happening - what was being done to enhance the fishery and conserve stocks. The reality was that nothing was being done and stocks were certainly in decline.

On hearing first hand from some farmers whom I knew on the foothills of the Silvermines mountains on the Newport Mulcair tributary - that poaching was rife and severe damage was being done to spawning stock. They showed me the areas it was happening in and were able to name certain individuals involved. I was curious as to why nothing was being done. Nobody seemed to really care - which was most surprising and the angling clubs on the system existed but were not pro-actively involved in managing the river system.

Wanting to be proactive and get something done I duly joined the club scene and became club secretary of the Shannon, Mulcair & District Anglers within a short time. I instigated a meeting with the ESB c/o [REDACTED] and [REDACTED] from the IFI was also invited. At this meeting I pointed out what I knew about the wholesale slaughter of salmon during spawning times in the upper reaches. There was denial from both the ESB and the IFI but they did accept that there was no management plan in place and interested parties were working independently.

Within several years the Mulcair River Partnership group was formed to oversee the management of the river system. This comprised of the ESB, IFI, Shannon Mulcair & District Anglers and the Limerick & District Anglers came on board some time later.

Progress was slow due to the fact that this was a public fishery and historically frosty relations existed between all parties. Nevertheless we did succeed over the years and many conservation initiatives implemented. I was very involved and instigated the majority of the conservation initiatives implemented below:

1. the inclusion of a fish pass under the Limerick by-pass (funded by the NRA under the guidance of [REDACTED] in the IFI)
2. the banning of the prawn
3. the separating of the fishery permits (Shannon & Mulcair) eased angling pressure
4. the removal of Ballyclough Weir (enabling free passage of fish up the system)
5. The 'Mulcair Life' rehabilitation programme - applied for by [REDACTED] from IFI and later overseen by [REDACTED] - both excellent and passionate about the enhancement of the fishery.
6. the upgrading of angling access - foot bridges and styles.
7. the inclusion of a 'fly only' stretch in Scart which has recently been extended to cover the long field area in Scart.

Unfortunately while all the above positive initiatives were put in place the protection of stocks remained inadequate. Anglers on the system could be categorised under two main headings - the recreational angler and the commercial rod angler. The recreational anglers came from far and wide and were more conservation minded and enjoyed their angling but were mindful not to over exploit.

On the other side we had the commercial rod angler who was allowed 'camp' on the system and 'overfished' removing large quantities of salmon down the years. This unfortunately was allowed to happen and led to tension between both sets of anglers. The genuine 'recreational anglers' began to distance themselves from the fishery and many were intimidated and felt unwelcome - resulting in many leaving the fishery and not returning.

All this centres around the lack of will power to protect stocks. I only ever met protection staff on the fishery once in ten years - amazing considering the prolificacy of the fishery.

Historically the ESB provided their own staff to protect stocks. By 1998 ESB protection staff had reduced to four and this number was increased by the ESB contracting out the protection to Mid-West security - with the ESB involved in personnel selection. This new arrangement was then scrapped and the protection given to the IFI from 2006.

Unfortunately this has not worked. The IFI staffing level is inadequate and more importantly their unwillingness to engage meaningfully with those who care about the fishery is disappointing. I have been at many meetings down the years with the ESB and the IFI and the IFI were continually in denial and unwilling to tackle the problem of illegal angling and poaching, particularly on the spawning beds.

To give you a few examples - we met with IFI staff and passed information their way as to where the poaching hot spots were and to who was involved - it was not followed up on. In fact the lack of protection on the spawning beds got so bad that we instigated the funding of our own club water keepers. We fundraised at club level to cover diesel expenses for our two water keepers. The IFI were unwilling to work with them [REDACTED] and [REDACTED] spent hundreds of hours keeping an eye on the spawning beds and only once met IFI protection staff. We tried to work with them and they were not interested and unfortunately saw us as a threat.

I met with them on numerous occasions trying to build up relationships and work more closely together but unfortunately this was not forthcoming. The conservation of the fishery was not foremost in their minds.

We asked for cameras to be installed on the tail race in Ardnacrusha - one of the worst poaching hot spots for decades. Both the ESB and the IFI funded several cameras. The IFI were supposedly monitoring these cameras from a premises in the Castaway business park in Limerick. It became apparent that these were not being monitored effectively as one camera was pointing in the sky for 3 months. Only after communication with the IFI was the problem corrected.

One of our committee membersattempted to work closely with the IFI and build up a working relationship with them. He was thwarted in his attempts. [.....PERSONAL DETAILS REDACTED]. When the IFI staff took over protection they would seize on average between 3-4 nets per year on the tail race - which they reluctantly admitted to us at a meeting after being quizzed on the subject. Nevertheless when Mid West security were employed by the ESB they frequently seized between 30-40 nets per annum. The IFI staff were simply not on the ground and not doing the job. [REDACTED] attended this meeting in Ardnacrusha and represented the ESB at that particular meeting.

The fish counter is managed by the IFI - it has been broken more often than not down the years. Fish counter readings and averages during these times were certainly way off the mark, as well as tag returns which are meaningless due to the lack of protection and inaccurate filling in of log books by many.

I do not like criticising the IFI but unfortunately one staff member in particular is widely known to befriend several of the commercial rod anglers - which is also highly unprofessional and worrying.

The continued opening of the lower Shannon under some dubious bye-law beggars belief. There is no doubt lobbying of local government officials also plays a part here.

Mulcair - possible solutions

I have thought long and hard about how best to one forward and the most obvious way to me is the setting up of a co-operative, whereby anglers buy their annual permit set at a reasonable fee.

It is open to everyone but zero tolerance must be adhered to.

There needs to proper resources put in place to tackle poaching and illegal angling.

The co-operative could possibly turn the 'long field' in Scart into a beat. The co-operative could have a certain number of rods per day and the remainder would be sold to visiting and tourist anglers. The funds would help with protection.

The number of fly stretches need to be increased and the current ones extended. The whole river system should be turned into fly only angling.

Cameras need to be put up at Annacotty weir to monitor safe fish passage - which is currently problematic.

In-stream rehabilitation, angling accessibility and continued bank maintenance will have to be continued.

The co-operative committee to have a representative from both the ESB & IFI.

Tourist angling day / weekly permits available.

A certain amount of annual funding will have to come from the ESB - to help with protection, maintenance and rehabilitation.

The current fish counter is unfortunately problematic and many of the historical figures are certainly inaccurate.

Submission 8 – Brendan Ryan

I am making this submission as an individual angler who has enjoyed fishing the Mulcair for some years.

Up to 2014 we were allowed to spin and fly fish, and to tag and kill a quota of fish. There was strict rules on this, and most of us anglers abided by them. There is more than enough rules there. There is no need to be making a big thing out of this. There is lots of fish there. Just let the genuine angler do what we have done for years, and enjoy our bit of fishing, enforce the rules that apply them, and enforce them fairly, and let us do our bit of spinning or fly fishing, and take the old fish. It's very simple. A man or woman with a rod and line is not doing the damage, and never did. Like myself a lot of anglers are on pension, and find the fees very expensive, so the cost of the permit should be reduced.

Brendan Ryan

Submission 9 – Ruairí Ó Conchúir

I would be happy to discuss with you the work of EU funded MulkearLIFE project which I managed from 2009 to 2015 and to work with you, if you so desire, on your Mulcair River Review 2017.

The focus of MulkearLIFE's work was catchment scale river restoration but it also included one of the most comprehensive annual fish stock surveys ever undertaken anywhere in Ireland as part of the project's monitoring programme, for five years from 2010 to 2014. As part of this, the project processed a total of 11,471 fish at thirty-five sites in the Mulkear catchment. The data generated has been invaluable in the AfterLIFE project phase.

I attach a short general article on the work of the project which I wrote in December 2014 for the River Restoration Centre which gives a good general overview of the work undertaken.

Ruairí Ó Conchúir

Submission 10 – Lough Derg Science Group

We noted your note in the 'Nenagh Guardian' the last two weeks on the management options for salmon on the Mulcair River. We would be pleased to have your views on the management of the salmon for the Mulcair; and with the proposed rubble fish pass at Parteen how the management would influence the re-colonisation of the Shannon by salmonids. We would also be interested to learn what other species might ascend this fish pass.

The members of our Group, the Lough Derg Science Group have an interest in the matters that might influence, in particular, Lough Derg. We have been in existence since 2003. The aims of the Lough Derg Science Group are:

1. To study the ecosystems of Lough Derg and surrounding areas, their diversity, variability and controlling mechanisms;
2. To address environmental, social and socio-economic issues affecting Lough Derg, its natural resources, amenities and users;
3. To stimulate interest in the natural features of freshwater environments and the methods used to study them; and
4. To inform and advise agencies, organizations and the public regarding problems affecting Lough Derg, changes that are occurring and management measures necessary to preserve the intrinsic environmental and recreational qualities of the lake and its margins.

So when you have completed your study we would be very interested to receive a copy of the report and also your views in relation to our queries above.

Dan Minchin & Rick Boelens

Lough Derg Science Group

Submission 11 – Peter Duggan

Further to our conversation on Thursday 12th January, I would like to make the following submissions regarding the management of the Mulcair river: could the blueprint of the Ballisodare River be replicated on the Mulcair? Could a person be found that could bring all the clubs (E.S.B. and I.F.I.) together for the betterment of the Mulcair? Failing the above, I would like to see the Long Shore in Limerick and the Long Field in Ballysimon as designated sanctuary areas. The placement of simple structures in the river in sanctuary areas should be considered. This would prevent netting and fishing. It would also prevent confrontation between fishery officers and the [REDACTED] from Limerick who fish. Spinning should be allowed – most of the river is only suitable for this method. The problems of Ardnacrusha and Parteen Weirs need to be addressed urgently by the E.S.B. Please see enclosed pictures of I.F.I. staff releasing six salmon trapped behind the Ballyartella turbine on the Nenagh River. I believe this is a good example of what is happening at Ardnacrusha for years.

Peter Duggan

Submission 12 – Martin Kiely

I see you have put a public notice on my local newspaper for a review and assessment of the Mulcair river, a tributary of the river Shannon, you are asking the clubs and general public for some input to the said assessment.

My name is Martin Kiely, I am a professional Distance Spey Caster. Angler and hold a World Title of World Senior Spey O Rama Champion 2016 which was held in the Golden Gate Fly Casting Club in San Francisco USA last April.

I would like you to take into consideration the following in your final assessment for this fishery and the people who like to fish the Mulcair. My first point is that due to the rules that are in place at the moment for Anglers mean that juveniles are restricted to Fly and Spinning for Salmon, this is very wrong as in most cases most of us started off with a bunch of worms and gained our experience in the Art of fly fishing and Spinning as we watched and learned from others. I have worked with young males through the probation service lecturing and teaching workshops to groups of young males and the amount of young males that their lives are ruined through illegal drugs and prescription Drugs in Limerick city and county are scary and to think that younger generation are losing out on what I grew up with, freedom to fish for salmon with their parents or friends with methods that every angler started out with and that's a worm, you must also take into account the affordability to young Anglers who may have difficulties coming from low income families on getting fishing gear to suit the rules enforced on the Mulcair, this is totally wrong and unjust, fishing is a way of keep kids off the streets and some day might just save their lives. I only worked with the probation service for 5 years and had the opportunity to bring these groups fishing. Unfortunately I could only bring them to lakes that had being stocked with trout as the said rules dictated that I could not bring them to any river in the Limerick area. In my 5 years I have witnessed lives lost through over dosing and suicide and to think we are keeping away young kids from the bank of the river over said Rules is very sad indeed. One of my other concerns is the older generation who cannot stand up all day casting a fly or a spinner (this will come to us all, OLD AGE) sadly since the New rules got introduced to the Mulcair we have lost some of our older generation who lost out on what got them out and about on the bank of the river, who only want to pass away their day chatting to others and maybe catch a fish but sadly we will lose others that cannot fish within the said rules and will go to their graves missing out on what they loved to do but could not due to said rules. Will you please take into consideration my views on what points I have highlighted and please think of the lives lost through addiction (kids who may have being fisher men or women) and the people we have lost and who lives may have continued a little longer if they had the freedom to fish our river without the said rules (our older generation)

Martin Kiely

Meetings with Individuals / Groups :

- 13 Eamon Cusack - Chairman, The Shannon Partnership and former CEO, Shannon Regional Fisheries Board.
- 14 Ruairi O Conchuir – Former Director, MulkearLife Progammmme.
- 15 Eoin Brockett and subsequently Kevin Hannah and Noel O Donnell – Limerick and District Anglers.
- 16 Dr Dan Minchin and Rick Boelens – Lough Derg Science Group.
- 17 Peter Gallagher – ESB Fisheries.
- 18 Noel Greely and Dennis Doherty – ESB Fisheries.
- 19 Amanda Mooney – Inland Fisheries Ireland.

Appendix 2 – Newspaper Advertisement

Review and Assessment of Fishery Management Options for the Mulcair River, Co Limerick

ESB has recently requested me to carry out an independent review and assessment of fishery management options for the Mulcair River, which prioritise the conservation of Salmon. These could include such issues as: fishing methods, permit fees etc. I have agreed to provide ESB with a full report before the end of January 2017. Accordingly I would welcome submissions from all relevant stakeholders, such as local angling clubs, the general public, State agencies, Local Government and other interested parties engaged in angling tourism or the provision of angling accommodation.

All submissions should be made via email (ken.whelan@hotmail.com) and should reach me no later than Friday 16th December 2016, at 18.00. The “subject” heading in the email should begin: “*Mulcair River Review, 2017.....*”. The submissions should include the name and full contact details of those making the submission. All submissions will be acknowledged by email during the week beginning the 19th December. Anyone who does not receive an acknowledgment by the end of that week should make contact with me by email or by telephone. Any submissions received outside of this timeline will be returned to the sender. Please note that those making submissions will bear the costs of same.

Having reviewed the submissions I will, as necessary, make contact with individuals or organisations to clarify areas of their submission or to seek additional information. Should the need arise, I will also make contact with parties that I judge have additional information which could be of importance to my review.

All submissions received shall be published with my final report and recommendations. Those making submissions will be informed in due course where the report will be published and how to access same. Social media and other internet notifications will also be posted containing details of where the report can be located.

It is intended that this review process shall be open and transparent and I look forward to working, over the coming months, with all of those who value angling on the Mulcair.

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