

Oifig an Árd Runai  
An Roinn Cumarsáide  
Fuinnimh agus Acmhainní Nádurtha  
Baile Átha Cliath 2



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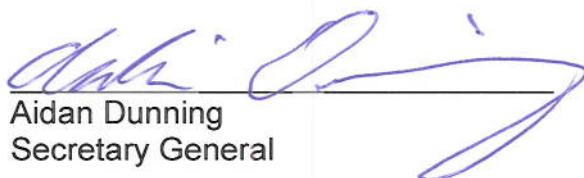
Ms Fiona Cashin  
Committee Secretariat  
Committee of Public Accounts  
Leinster House  
Dublin, 2

Dear Ms Cashin

I refer to your letter of 31 May 2012 in relation to my appearance before the Committee on 17 May 2012.

On the day, I undertook to supply the Committee with further information on the issue of the policing of rivers which is set out at Appendix I.

Yours sincerely

  
Aidan Dunning  
Secretary General



**A note on the issue of the policing of rivers, particularly in respect of draft net and drift net fishing and the expenditure involved**

Section 7(1) of the Inland Fisheries Act 2010 identifies the principal functions of Inland Fisheries Ireland (IFI) as being the protection, management and conservation of the inland fisheries resource. This includes the protection and conservation of recreationally caught sea fish species and also salmon and sea trout out to the 12 mile limit.

Prior to 2002 there were both a commercial and recreational fishery for salmon, but this was unregulated in terms of total number of fish being taken. In 2002 Ireland introduced an annual quota for the angling & commercial salmon fishery and reduced that quota progressively on an annual basis from 219,000 salmon in 2002 to 62,000 in 2007. Up to 2007 these measures provided some protection for stocks but did not however deal specifically with the mixed stock nature of Ireland's marine salmon fisheries. These fisheries were known to take salmon from stocks below conservation limits not just in Ireland but also from stocks originating from rivers in neighbouring countries.

In order to align fully with the scientific advice from ICES (International Council for Exploration of the Sea) and North Atlantic Salmon Conservation Organisation (NASCO), the Irish Government closed the mixed stock salmon fisheries (drift net fishery) in 2007.

This closure of Ireland's mixed stock commercial salmon fishery was supported by a €30m Hardship Scheme. This scheme was aimed at fishermen who were prepared to permanently leave the sector and was administered through Bord Iascaigh Mhara. While the Commercial Fishery Licences (on a public fishery) gave rise to no property interest, a hardship scheme was made available to all commercial salmon licence holders from previous years and they were given a hardship payment to cease commercial salmon fishing, surrender their net to the local Fisheries Board (now IFI) and

leave the sector. Applications were accepted up to the end of 2007 for interested applicants.

Subsequent to the introduction of the hardship scheme and the cessation of mixed stock salmon fishing at sea, commercial salmon fishing only takes place in 28 rivers and in three common estuary locations where the contributing stocks are each above their conservation limits. Castlemaine Harbour is the only estuarine location which has three contributing salmon stocks.

Since the cessation of mixed stock fisheries at sea the protection effort involved in managing the commercial salmon fishery has reduced, however there is always a requirement for fisheries protection, even when the fishery is closed. As with practically all regulatory situations there is always a cohort of people, determined though small in number, who are willing to break the law. It should be noted that there is a caveat in the agreement signed by former drift net fishermen that should they be prosecuted for illegal salmon fishing legal moves will be initiated to recover their hardship payments. However, many of the people involved in illegal salmon fishing were not in receipt of hardship payments and so the 'incentive' not to illegally fish does not apply. So while the job of policing salmon fishing has changed, as any boat now operating a salmon drift net at sea is doing so illegally, protection is still a very resource intensive activity.

The policing and regulatory functions in the State are resource intensive. To put this in a manpower context, an individual Fisheries Officer is available for 35 hours in a week, and during the salmon migration season officers work a considerable portion of their weeks at unsocial hours. In keeping with all other policing and regulatory functions in the State IFI uses experience and intelligence to target particular locations and risks. In this regard IFI also operate a very successful 24 hour illegal fishing hotline.

Only draft nets and snap nets and recreational anglers operate in river fisheries. Patrolling the legal draft net fisheries and snap net fisheries reflects



the fact that these tend to work in the same places (netting stations) and can be viewed from the shore in most instances. Nonetheless this requires a significant number of staff to ensure that salmon are protected and the fishing that takes place is legal and no illegal activity is taking place.

To physically police the salmon fishery in the sea requires a very significant fleet of RIBS (Rigid Inflatable Boats) which IFI have located at strategic locations around the coastline, and one large protection vessel (LPV). As the drift net fishery is now closed the operational need has evolved from management and overseeing to active engagement and pursuit, so in this regard the RIBS are faster and more efficient and therefore utilised more.

In terms of protecting the inland river fisheries, IFI staff use a range of vehicles and equipment and in many cases must cover significant ground. For example Fisheries Officers regularly undertake night time kayak patrols to check for illegal nets in a river, and day time kayak patrols to check recreational anglers, as well as using bicycles along certain rivers and Personal Water Craft (Jet Skis) in certain estuarine locations. Officers also utilise a range of technologies to assist them from night sights and heat seeking scopes to assist in patrolling in low light and total darkness conditions, to using hand held GPS systems. To give a practical example the River Blackwater in Munster is approximately 83 miles long and contains both commercial draft net fisheries and a significant number of recreational anglers. Fisheries Officers effectively protect the salmon as they migrate to their spawning beds. Thus during the early summer as the salmon are entering freshwater the protection focus is on the estuarine and lower reaches of the river where the draft net fisheries operate and as the season moves on the protection effort focuses to upper reaches of the main river and tributaries where fish are spawning requiring different equipment and resources, and in common with the protection of fish at sea this is a 24 hour occupation. Details of patrols etc. are set out on the attached schedule.

Those caught engaging in illegal fishing are prosecuted by IFI and while in certain circumstances significant fines are imposed there are occasions when

the penalties imposed are, in IFI's view, less than sufficient to reflect the actual damage illegal fishing is doing to the valuable salmon resource and the local economy which relies on it.

In relation to expenditure, in 2011 just over €2.7 million of total expenditure relates to the wages incurred in salmon protection only, the vast majority of which relates to the management and protection of the fisheries resource. Whilst the above question relates to the draft and drift net fishery which only accounts for two species of fish, salmon and sea trout, all the other freshwater species including trout, pike and coarse fish require a sustained protection effort along with the much sought-after sea species bass.

The expenditure relates in particular to the deployment of fisheries staff -- Fisheries officers; Assistant Inspectors and Inspectors and the need for vehicles and boats throughout the summer.

**Table 1 - Details in respect of Nore and Suir**

Protection & Surveillance		2011	2010
Short Duration Boat Patrols (combined tidal nore and barrow excluding waterford estuary)	Man Hours	1,255	602 *
Net Seized (combined tidal barrow and nore)	Yards	825	900
Boats Seized (nore only)	No.	0	0
Prosecutions Initiated (nore only)	No.	4	0
On the spot fines (Nore only)	No.	11	20
Short Duration Boat Patrols (tidal Suir excluding waterford estuary)	Man Hours	795	480 *
Net Seized (tidal Suir)	Yards	1250	1650
Boats Seized (suir only)	No.	2	1
Prosecutions Initiated (suir only)	No.	3	5
On the spot fines (Suir only)	No.	4	5

NB \* July to December 2010 only

**Table 2 - National details**

Protection & Surveillance		2011	2010
Short Duration Boat Patrols	Man Hours	28,000	14,283 *
Net Seized	Yards	30,211	31,349
Boats Seized	No.	14	8
Prosecutions Initiated	No.	169	184

NB \* July to December 2010 only