

Fish Farm Consultation,
Inland Fisheries Ireland,
3044 Lake Drive,
Citywest Business Campus,
Dublin D24 Y265,
Ireland.

Re: - Public Consultation on IFIs exiting from freshwater trout production

To whom it may concern,

In 2015 IFI engaged the services of Canadian Aquaculture Systems Inc who carried out "*An Expert Analysis to Support Optimised Production of Freshwater Trout*". The final report from Canadian Aquaculture Systems highlighted deficiencies and outlined a number of options aimed at addressing these deficiencies. The expert analysis **does not recommend that IFI cease fish farm operations.** It is evident from the analysis that fish production operations at Roscrea are competitive when one considers that the facility is dated and inefficient. It is also evident from the report that the commercial sector will not be in a position to meet the demand for farmed trout if IFI exit trout farming operations. IFI spent a considerable sum of public money on "*An Expert Analysis to Support Optimised Production of Freshwater Trout*" and I am asking IFI to implement the recommendations contained within that report.

The decision to cease trout production operations has been taken because IFI managers have formed the general view that the cost of goods sold for stocking juvenile fish is higher than the revenue generated from the selling of the fish. A "general view" on the part of IFI managers is not sufficient justification to exit trout production operations.

The trout stocking program commenced in the midland lakes in 1957 when the Inland Fisheries Trust commenced lake management operations and introduced the Midland Fisheries Group Permit. At that time the Trust took ownership of equipment from angling clubs that were already engaged in trout production. These clubs also gave large sums of money to the Trust to assist in the development of trout hatcheries. This stocking program enhanced the angling status of many lakes and rivers and as a result some of these fisheries have played host to national and international trout angling events for many decades. Trout angling a vital social and recreational resource and it is widely acknowledged that

participation in angling activities yields social and health benefits for young people. It is absolutely vital that the status of all Irish trout fisheries is maintained if we are to continue to attract juveniles and novice anglers into the sport.

IFI have taken the decision to cease fish farm operations in the context of the IFI's budget and the financial and the employment risks that this decision presents for the wider Irish economy has not been adequately considered. Cessation of fish production operations will result in fewer lakes being stocked. The expert analysis states "*Reportedly, revenues (from the sale of permits for managed lakes program in the Southwest Region) are declining as a result of fewer lakes being stocked*". The expert analysis did not give consideration to the revenues from the sale of the Midland Fisheries Group Permit which will also decline if the decision to cease operations proceeds. In 2013 "A Socio-Economic Study of Recreational Angling in Ireland" valued recreational angling €755 million annually to the Irish economy and stated that the sector is responsible for more than 10,000 jobs. If the decision to cease operations proceeds angling related jobs will be lost and the €755 million generated through recreational angling will suffer.

I object in the strongest possible terms to IFI's decision to exit trout production operations.

Yours Respectfully,

Signature

Club or Fishery Name (Optional)