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Response to public consultation on the **Draft Wild Salmon and Sea Trout Tagging Scheme (Amendment) Regulations 2025**

A. INTRODUCTION AND OVERARCHING SWAN VIEW

SWAN welcomes the opportunity to respond to the consultation on the 'Draft Wild Salmon and Sea Trout Tagging Regulations 2025'. The regulations and information note are clear in their objective to adopt conservation strategies to ensure long-term sustainability in wild salmon and sea trout populations.

Atlantic salmon stocks in Ireland have reached critically low levels, necessitating decisive intervention to ensure that as many fish as possible survive to reach their spawning grounds in the years ahead. The species is caught in a rapidly accelerating decline, with many rivers falling significantly short of the numbers required to sustain healthy future populations. Without urgent and meaningful conservation measures, we risk driving the Atlantic salmon toward irreversible collapse.

We therefore commend the Department of Climate, Energy and the Environment, Inland Fisheries Ireland, and the Technical Expert Group on Salmon (TEGOS) for their commitment to safeguard Ireland's dwindling wild salmon stocks, in advance of the 2026 season.

B. CONSERVATION LIMITS (CL)

The information note associated with the consultation document, provides detail on Conservation Limits (CL) and harvest surpluses for stakeholders through a river-by-river designation. According to the IFI Status of Irish Salmon Stocks Report, only 57% (n=44) of Ireland's assessed salmon rivers are currently estimated to be exceeding biologically based CLs[1]. The collapse of national quotas from 91,500 in 2011 to roughly 30,000 for 2025, as set out in the information note, is alarming. The pressures driving this decline are acknowledged in the information note as being of a cross-boundary nature, affecting Ireland, the United Kingdom, Norway and Spain alike. It is therefore encouraging to see an alignment of CL thresholds in Irish rivers with those set by the International Council for the Exploration of the Sea (ICES) and the North Atlantic Salmon Conservation Organisation (NASCO).

[1] Status of Irish Salmon Stocks 2024 with catch advice for 2025 (2025). Inland Fisheries Ireland.

C. ENFORCEMENT OF NEW PROTECTION MEASURES

The addition of new protections for salmon in the amended regulations is reassuring. We welcome the Mandatory 'Catch & Release' protections from January 1st to May 31st to allow vulnerable spring salmon a chance to spawn and contribute to population recovery. Restricting harvesting between June and August to rivers that have a documented surplus and closure of the harvest period after the end of August would provide salmon populations a much-needed recovery period before spawning season. The enhanced protections for Multi-Sea-Winter (MSW) Salmon also come in good time. It is crucial however, to safeguard the largest and most critical spawning fish, potentially through the setting out of size limits. While the reduced bag limit for recreational angling might provide further relief to populations, the document is unclear as to how this will be regulated or enforced (for instance, anglers that do catch ≥4 salmon per season). With strong protection measures in place, effective enforcement and compliance are critical. Resources and budgets, earmarked specifically for enforcement, may be key to sustained protection of vulnerable populations.

D. CLOSURE OF COMMERCIAL FISHERIES

While SWAN welcomes the closure of a notable number of commercial salmon fisheries, we echo our member Salmon Watch Ireland in recommending a closure of all remaining commercial fisheries to allow the populations to recover, to be supported through just transition schemes which provide financial support and certainty for fishers while aligning Ireland with modern international conservation standards.

E. RECOMMENDATIONS

The amended draft regulations for 2026 include encouraging conservation measures, and a genuine commitment to reversing the long-term decline of salmon populations. In addition to these, we further recommend a focus on the following:

1. Water Quality Improvements

Addressing pressures impacting riparian, estuarine and coastal water quality at a systemic level, is key to ensuring healthy environments for the spawning and development of wild salmon. Incidents such as the Blackwater fishkill undo all the conservation measures and efforts being made to protect vulnerable fish populations.

2. Barrier Removal

Pushing forward the Barrier Removal Action Plan would greatly alleviate the stresses of blocked migration routes that impact the wild Atlantic salmon. The disruptions to the life cycle of salmon through barriers have led to significant populations declines and localised extinctions of salmon populations[2].

[2] Barriers to Migration (Accessed 07.12.2025). Inland Fisheries Ireland Research Theme.

3. Improved Enforcement and Compliance regimes

Allocating resources to enforce regulations effectively and protect vulnerable populations is crucial to ensure sustained population growth in the long-term.

4. Addressing Climate and Marine Survival Pressures

Salmon require cold, clean water to thrive, and therefore tackling broader environmental issues is necessary to support salmon health and survival rates.

5. Mitigating Aquaculture Impacts

Salmon farming in open-net sea pens, as practiced in Ireland, can have a detrimental effect on wild species and is a major factor in Ireland's declining wild salmon populations. Sea lice on farmed fish, diseases and escaped farmed fish can all enter the natural environment and harm wild salmon populations. SWAN's policy briefing on aquaculture[3] in Ireland presents evidence for recommendations around meeting Water Framework Directive and Marine Strategy Framework Directive objectives. We have included sections from this briefing relating to wild salmon below, as well as a key recommendation backed by our members.

Impact of salmon-farming on wild salmon:

Salmon farming can lead to the spread of diseases, issues associated with escapees (including gene-mixing) and marine pollution, which affect wild salmon's ability to survive in the wild and reproduce.

In a 2024 debate by the Committee of Public Accounts, Dr Cathal Gallagher (Deputy Chief Executive Officer, Inland Fisheries Ireland) was called and examined. He told the committee that "wild salmon numbers returning to Ireland have dropped from 1.7 million in 1975 to just over 170,000 in 2022. This is a catastrophic decline in less than one generation."

The ICES Working Group on Effectiveness of Recovery Actions for Atlantic Salmon identified 11 stressors affecting wild salmon: Pollution; Barriers; Water Regulation; Exploitation; Aquaculture; Habitat Degradation; Diseases / Parasites; Climate Change; Invasives; Stocking; and Predators. The North Atlantic Salmon Conservation Organisation (NASCO- an international organisation enabling seven Governments and the European Union to cooperate to conserve wild Atlantic salmon) uses this agreed list to conduct a stressor analysis in each EU jurisdiction. In the report from NASCO's June 2025 Annual Meeting, aquaculture is recorded as one of Ireland's four highest scoring stressors. This is primarily related to "the impacts associated with marine salmon aquaculture in open-net cages on wild Atlantic salmon populations, and in some instances, the effects of freshwater salmonid hatcheries on wild river populations. Main impacts on wild salmon include increased sea lice infestation pressure, escaped farmed salmon (both adults in

[3] SWAN, Aquaculture in Ireland (and references therein): https://swanireland.ie/wp-content/uploads/2025/10/Aquaculture-in-Ireland-A-Policy-Briefing-2025.pdf

the marine and juveniles in freshwater) and other potential infections related to fish farms that could spread to wild stocks... Lack of implementation of effective mitigation measures, and absence of planned future mitigation measures, largely contributed to the high overall score in this category."

Since the 1980s, millions of farmed Atlantic salmon have escaped into the wild (Solberg et al., 2016). These escapees can have serious impacts on wild populations, leading to gene mixing. A 37-year study of wild and open-net farmed Atlantic salmon found that salmon escapees can "substantially depress recruitment [breeding] and more specifically disrupt the capacity of natural populations to adapt to higher winter water temperatures associated with climate variability," leading to potential extinction of wild populations within 20 generations (McGinnity et al., 2009). The escapees are liable to transfer disease and parasites (including sea lice and pancreas disease), interfere with wild salmon breeding, genetically alternative populations, and compete with wild populations for food (Jensen et al., 2010).

In British Columbia, Canada, the Government recognised the threat that open-net salmon farming poses to wild salmon and the wider ecosystem and in June 2024, announced a transition away from this aquaculture practice, with a ban in place from June 2029. They are already banned in Denmark, Southern Argentina and some states in the northwest USA. However, the practice in Ireland is encouraged and subsidised.

Sea Lice:

Lice from farm origin are a main source of infection in wild salmon (Jansen et al., 2012) and can cause a sizeable reduction in the runs of wild Atlantic salmon. Research published in May 2025 by Patrick Gargan (formerly of Inland Fisheries Ireland) reports that "between the early 1980s and 2023, numbers of wild Atlantic salmon fell by more than half prior to any fishing taking place, and the reported catch of wild Atlantic salmon in 2023 was the lowest in the time series since 1960," based on ICES reported status. Coastal salmon aquaculture is posing a regional threat to wild salmonid stocks, particularly through sea lice infestations from open net farms. The meta-analysis performed by the researchers showed "salmon lice from salmon aquaculture as a mechanistic threat to wild Atlantic salmon." A 2017 study used 26 years of data to examine the effect of sea lice from salmon farming in Killary Harbour and the effect on the return of wild Atlantic salmon to the River Erriff (County Mayo) and found that returns of wild adult salmon could be reduced by over 50% in years following high lice levels in the nearby salmon farms (Shephard & Gargan, 2017). This is especially concerning as the River Erriff and Killary Harbour are part of a Special Area of Conservation (SAC) in which Atlantic salmon are one of the selected species (NPWS). High concentrations of salmon in open-ocean pens or cages have been linked to increased levels of sea lice (Jansen et al., 2012; Walraven, Fjørtoft & Stene, 2021), particularly where farms are located near shore and in high densities. High densities at aquaculture sites can increase the risk of disease outbreak, with sea lice then affecting wild salmon populations. Sea lice from salmon farms have also been found

infecting wild sea trout, leading to mortality and premature return to fresh water (Gargan, Shephard & MacIntyre, 2017).

Recommendation:

Ban open-net salmon farming
SWAN calls on the Irish Government to follow the example of British Columbia (Canada) and other salmon-farming regions and ban open-net salmon farming within a transition period, for the protection of wild species and benefit of the marine environment. No renewals or new licences will be permitted within that period.