30 October 2026

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Re: Consultation on proposals for the management of Ireland's Wild Atlantic Salmon Fisheries from 2027

Sustainable Water Network (SWAN)

The Sustainable Water Network (SWAN) is an umbrella network with 26 member environmental NGOs. We work to advocate for the protection and restoration of Irish freshwater, transitional, coastal and marine waters. We play an active role as stakeholders and in water stewardship both at the national and EU level. We are members of European eNGO networks including the European Environmental Bureau (EEB) and Seas at Risk. SWAN welcomes the opportunity to provide feedback and policy recommendations on various factors concerning salmon conservation.

Ireland’s salmon

The decline of Ireland's wild Atlantic salmon populations in recent decades is stark. As such, SWAN welcomes the Minister's review by Inland Fisheries Ireland (IFI) into Ireland's Salmon Management Framework. Wild salmon play an important role in Ireland's waters. They are both a keystone species, necessary for the functioning of their ecosystems, and an indicator species, with unhealthy salmon and declining numbers indicating an unhealthy river or bay.

Atlantic salmon (*Salmo salar*) are anadromous, beginning their lives in freshwater rivers, before making epic migrations to sea as adults, then returning to the rivers in which they were born to spawn. Given their unique lifecycles, wild salmon face numerous pressures in both freshwater and marine environments and conservation measures aimed at the protection and conservation of wild salmon must be multi-faceted to address these many threats.

Pressures

The ICES Working Group on Effectiveness of Recovery Actions for Atlantic Salmon identified 11 stressors affecting wild salmon, also used by the North Atlantic Salmon Conservation Organisation (NASCO):

- Pollution
- Barriers
- Water Regulation
- Exploitation
- Aquaculture
- Habitat Degradation
- Diseases / Parasites
- Climate Change
- Invasives
- Stocking
- Predators

Each of these stressors must be addressed to ensure the continued survival of Ireland's wild salmon. As noted, this requires cross-departmental collaboration and coordinated action. SWAN welcomes DCEE's recognition that "*no single measure [is] capable of reversing this trend [and] there is a need to take reasonable action to* ***protect returning salmon****, strengthen the* ***resilience of individual river stocks*** *and support their* ***longer-term recovery***" with action beyond existing measures.

We particularly support the IFI recommendation for a more **precautionary approach** and welcome DCEE's intention "*to undertake further work with IFI and other bodies to* ***identify opportunities to strengthen the longer-term protection and recovery*** *of wild salmon. This may include consideration of* ***habitat protection and restoration, water quality, barriers to migration and river connectivity, monitoring and scientific assessment, enforcement and compliance and other pressures*** *affecting salmon survival*." However,

we are concerned that the proposed measures then focus mainly on recreational anglers and commercial fishers. The consultation notes the pressures on salmon from numerous sources, yet makes no proposals in relation to these. As such, SWAN is submitting a written response which also includes **several other stressors** with recommended measures.

Proposed Measures

SWAN fully supports the submission made by our member organisation Salmon Watch Ireland (SWIRL) and their recommendations: "We support **river-by-river management**, **reduced exploitation** and **greater protection of spawning stocks**. We request a framework based on a **75% assessment probability** and a **management target of 110% of the Conservation Limit**, with tightly controlled recreational retention, no harvest before **1 April**, and a funded transition towards the **cessation of commercial salmon netting** with interim restrictions." We point to SWIRL's submission to this consultation for a more detailed response, to which we add our voice.

Aquaculture

SWAN's main area of concern in relation to the conservation of wild salmon regards the effects of aquaculture. SWAN's 2025 policy position included reference to several studies about the effects of open-net salmon farming on wild populations, and makes recommendations based on this evidence base. These mainly reference the effects of **pollution around cages from faeces and uneaten food, sea lice and disease spreading from cages to wild populations, and the effect of escaped fish breeding** with wild fish.

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 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*."

SWAN's main recommendation from our policy position calls for a **ban on open-net salmon farms**. When farmed salmon are no longer kept in cages off our coasts, wild

salmon will face less pressure from associated gene-mixing from escaped farmed fish and potential for disease and sea lice infestations, as well as cleaner water surrounding cages.

Water Quality

SWAN has been actively engaged in ensuring Ireland meets **Water Framework Directive (WFD) objectives** for over 20 years, and has made detailed submissions regarding water quality issues and other water policy implementation including a response to public consultation on the Significant Water Management Issues for the Fourth Cycle Water Action Plan 2028- 2033 and response to public consultation on the Timetable and Work Programme for the Fourth Cycle Water Action Plan 2028 – 2033. Within these, we go into detail about the pressures affecting water quality in Ireland's rivers, lakes and groundwaters.

Salmon are sensitive to changes in water quality and as such, **improvements to Ireland's waterways** will improve survival chances for salmon throughout their lifecycles.

The WFD also provides the **catchment management approach** which will be necessary to successfully tackle the multiple pressures on salmon in an integrated way and we recommend that salmon management is closely integrated with the Programme of Measures under the Water Action Plan.

Hydromorphology (barriers, dams, weirs)

Physical modifications to Ireland's waterways made over the past decades can have a significant effect on salmons' ability to return to their natal waters to breed. The WFD requires policy measures to **prevent or mitigate hydromorphological alterations**, which must be incorporated into future salmon conservation approaches.

Human-constructed barriers in rivers (from small weirs to large dams) can alter the hyromorphology of sections of rivers and interfere with salmon migration. **Managing flow, or removing small barriers**, can mitigate these effects.

Per Inland Fisheries Ireland (IFI) research, "hundreds of barriers are still present in Ireland’s rivers, and most now serve no purpose. Many of them **prevent our migratory fish species like salmon, eel, lamprey and shads from making their journeys between the sea and freshwater**" (IFI, 2026). These barriers must be **assessed for their ongoing usefulness and their removal considered** to improve conditions for salmon.

Climate change

Salmon require **cold, clean water** to survive and thrive. With climate change warming rivers and the ocean, salmon face temperature pressure in fresh and marine waters (Thorstad *et al*., 2021). Warmer waters have reduced oxygen, making it harder for salmon to breathe. **Increased temperatures also affect salmon survival** at different stages of their lifecycle. Their metabolism increases, requiring greater energy expenditure. Climate change is an existential threat affecting all aspects of nature and biodiversity, and must urgently be addressed at a national, EU and global level, for the ongoing survival as salmon, as well as all our ecosystems.

Conclusion

With so many threats to this important species, **salmon management requires action through many approaches, key of which must be integrated catchment management**. The wider fight against climate change must be amplified to ensure salmon have **water of an acceptable temperature**. Ireland's **rivers must meet Good Status**, requiring the objectives of the Water Framework Directive to be meet and ensuring **clean, healthy waters** for salmon. The **migration paths of salmonids** must be considered in the consideration of changes to barriers in rivers. Finally, SWAN again calls for a **transition away from open-net salmon farms**.