

Issue Number 16

02 July 2025

The prospect of an avalanche of applications for Review and Renewal of Salmon farms has arrived with six public consultations launched in recent weeks.

We are making strong submissions objecting to these applications on an ongoing basis and hope that we will have success, but this is a very precarious situation as the government appears to be strongly supportive of expanding this industry in Ireland.

Our supporters can rest assured that we will try and protect wild salmonids from open cage salmon farms and will go as far as possible to explore all legal avenues open to us.

SALMON WATCH IRELAND NEWSLETTER

- **Real Time Management of Atlantic salmon in Ireland – Time to change.**
- **Salmon Farm Submissions**

Real Time Management of Atlantic salmon in Ireland Time to change.

The stark reality is that as of the start of July, salmon have not run our rivers in expected numbers. The onus of protecting this resource lies with Inland Fisheries Ireland and as such we are appealing to the board and management of IFI to put in place a system of protection to allow as many salmon as possible to spawn this year. This must be enabled through real-time, catchment-specific river management.

We are aware that there is a process being undertaken to review management policies regarding salmon by Inland Fisheries Ireland, but we are frustrated that this appears to be unduly delayed.

In the interim management can implement simple plans this year to reduce exploitation by introducing by-laws to reduce levels of exploitation both commercial and recreational.

Anecdotal reports suggest that spring salmon runs across most catchments up to the end of May are at their lowest levels in recent memory. Given their critical role in sustaining ova deposition, both these fish and larger summer salmon should receive increased protection for the remainder of the season.

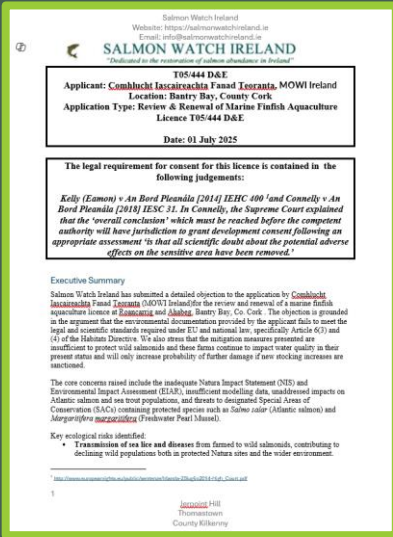
To this end we are strongly suggesting that salmon over 65cm should be returned and that rod exploitation should be reduced by reducing daily bag limits.

Regarding commercial exploitation, we strongly urge an immediate reduction in this year's quota to reflect the current conditions on these rivers. If a legal reduction is not feasible, Inland Fisheries Ireland should actively engage with commercial fishers to seek voluntary catch reductions in the interest of conservation.

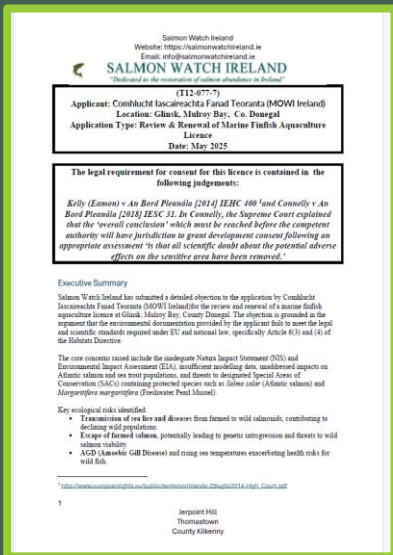
**"In the absence of salmon, there is no future for our rivers.
We must act now—real-time protection is not optional, it's
survival." – *Salmon Watch Ireland***

The latest submissions
can be read at the
following links:

Bantry Bay



Glinsk Bay



Salmon Farm Submissions

Two Licence Objections Lodged: Salmon Watch Ireland Speaks Out

Salmon Watch Ireland has officially submitted objections to the review and renewal of two marine finfish aquaculture licences applied for by Comhlucht Iascaireachta Fanad Teoranta (MOWI Ireland) — one for Glinsk in Mulroy Bay, County Donegal and the other for Roancarrig and Ahabeg in Bantry Bay, County Cork.

These objections are grounded in the argument that the environmental documentation fails to meet legal and scientific standards required under EU and national law, particularly Article 6(3) and (4) of the Habitats Directive. In both cases, no “imperative reasons of overriding public interest” (IROPI) were cited to justify the environmental risks posed.

Key Environmental Concerns (Glinsk & Bantry Bay)

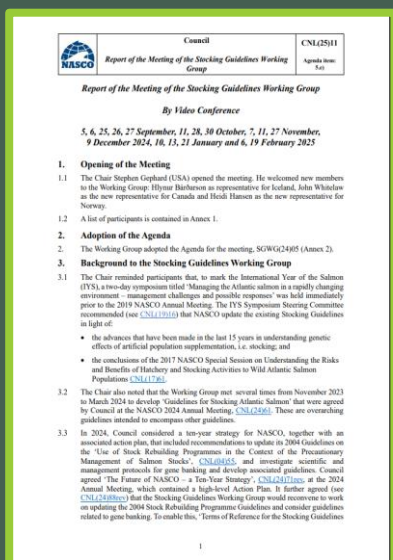
- **Sea Lice & Disease Transmission:** Farmed salmon are proven vectors for sea lice and marine diseases, which severely impact wild salmon and sea trout. Numerous peer-reviewed studies—ignored by MOWI and the Marine Institute—highlight that lice infestations lead to a significant reduction in adult salmon return rates.
- **Escapee Salmon & Genetic Pollution:** Escape events, such as the recent Killary Harbour incident, show farmed salmon can travel up to 100 km, posing genetic risks to native stocks.
- **AGD & Rising Sea Temperatures:** Amoebic Gill Disease is increasing in frequency due to warming seas. Studies show wild fish have a much higher mortality rate than farmed ones when exposed to AGD.
- **Mortality Rates & Welfare Failings:** Irish salmon farm mortality rates have been exceptional over recent decades. These mortality events raise serious animal welfare and environmental degradation concerns.
- **Cleaner Fish Use & Ecosystem Disruption:** The use of wild-caught wrasse disrupts local ecosystems and may impact protected species such as otters (*Lutra lutra*). These fish are culled after production cycles with no comprehensive impact studies provided. The culling of these fish is to prevent transmission of pathogens to wild fish stocks which in itself is an admission of environmental damage.

We also are in the process of drafting submissions for four applications relating to Kilkieran Bay



We are constantly being asked about the prospects of large-scale stock rebuilding for rivers in distress.

The following guidelines might help in understanding the various factors involved NASCO Guidelines on Stock Rebuilding



Deficiencies in Environmental Assessments

Across both submissions, Salmon Watch Ireland cites critical flaws in:

- **Natura Impact Statements (NIS) & Environmental Impact Assessments (EIA/EIAR):** These lack scientific rigor, omit vital data, and do not comply with Article 6 requirements.
- **Water Quality Modelling:** Both applications present unverifiable modelling for pollutants like DIN, BOD, and phosphorus, preventing independent validation.
- **SAC Oversight:** Special Areas of Conservation are not adequately considered in documentation presented.

Legal Framework: Scientific Certainty Required

Per the *Kelly v An Bord Pleanála* [2014] and *Connelly v An Bord Pleanála* [2018] rulings, licences cannot be renewed unless all scientific doubt about potential environmental harm is removed. Both objections emphasise that significant doubt remains.

Nature Restoration Law: Binding EU Commitments

The EU Nature Restoration Law obliges member states to:

- Restore degraded marine habitats.
- Protect migratory species like sea trout and salmon under Annex III.
- Reach ecosystem restoration milestones: 30% by 2030, 60% by 2040, 90% by 2050.

Continued open cage salmon farming is fundamentally incompatible with these obligations.

Scientific Integrity at Risk

The exclusive reliance by DAFM and MOWI on Marine Institute studies—which downplay the role of lice—ignores more comprehensive, peer-reviewed research. New studies involving 43 paired-release trials (2001–2019) across Ireland show:

- 18% reduced adult return rates due to lice.
- Treatment effectiveness waning over time.
- Correlation between lice density and population decline in both treated and untreated groups.

Please Donate to Salmon
Watch Ireland

We offer a limited
research function
regarding legal and
environmental issues

Please contact us

Email:

[Salmonwatchireland
@gmail.com](mailto:Salmonwatchireland@gmail.com)

Phone 086 3991074

Point of Contact: John
Murphy

Donate and Support

[Salmonwatchireland.
ie](http://Salmonwatchireland.ie)

Salmon Watch Ireland's Position

- Reject licence renewals for Glinsk and Bantry Bay
- End open cage salmon farming in sensitive ecosystems.
 - Transition to land-based technologies
- Uphold the precautionary principle and scientific integrity in environmental regulation.

**"We cannot allow economic
interests to override ecological
realities."**

