



**ONTARIO  
RIVERS  
ALLIANCE**

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Jason Borwick  
Senior Fisheries Biologist  
Ministry of Natural Resources and Forestry  
Policy Division, Biodiversity Branch  
Fisheries Policy Section  
300 Water Street, 5<sup>th</sup> Floor, North Tower  
Peterborough, ON  
K9J 8M5

**Re: EBR Registry: 012-2836  
Provincial Bait Policy Review – Angler Use and Movement of Baitfish in Ontario**

Dear Mr. Borwick:

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for the French River Delta Association, CPAWS-Ottawa Valley, Kiishik Community Association, Food & Water First, Whitewater Ontario, Vermilion River Stewardship, Friends of Grassy River, Mississippi Riverwatchers, French River Stewardship, as well as many other stewardships, associations, and private and First Nations citizens who have come together to protect, conserve and restore healthy river ecosystems all across Ontario.

ORA is very pleased to comment on the Provincial Bait Policy Review which is designed to determine how to minimize the ecological risks associated with the movement and use of baitfish and leeches, and to reduce the complexity of current management regimes while increasing certainty to the bait industry.

According to the background material provided on the Environmental Registry for the Bait Policy Review, the introduction of non-indigenous species is considered one of the greatest threats to global biodiversity, and that once an alien species is established, eradication is seldom possible. Therefore the focus of the Provincial Bait Policy should be to prevent new introductions of alien species, pathogens, parasites and microscopic invasive species from occurring.

The economic impact of a heavily regulated bait fish industry has been seriously considered; however, it is imperative to consider that the economic impacts of an out-of-control aquatic invasive species such as a Zebra Mussel or Carp infestation could be far greater when considering the potential loss of a multi-million dollar fishing industry.

The release of live bait into the wild is a common occurrence despite the fact that it is illegal, and it is impossible to effectively patrol and regulate this activity throughout the thousands of lakes and rivers across the province. ORA is therefore recommending that there must be much



stricter regulation placed on the baitfish industry to protect all freshwater lakes, rivers and streams in Ontario.

ORA recommend the following for the policy options provided:

**1. Type of Bait Used by Anglers**

**Option B** – Allow live bait, but limit the number of legal baitfish species available to anglers, with a preference to native species.

**2. Managing the Scale of Angler Movement to Bait**

**Option E** – Restrict movement of bait by anglers to one or more watersheds.

**3. Angler Storage of Bait**

**Option C** – Angler storage of bait must not be allowed in Ontario.

**4. Personal Harvest of Bait**

**Option D** – Personal harvest of bait must be banned across Ontario.

**5. Use of Bait by Anglers in Defined Sensitive Areas**

**Option C** – Bait use must not be allowed in sensitive areas.

ORA is very grateful for this opportunity to comment.

Respectfully,

Linda Heron  
Chair, Ontario Rivers Alliance  
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