



**ONTARIO
RIVERS
ALLIANCE**

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Karen Hartley
Senior Protected Areas Ecologist
Ministry of Natural Resources and Forestry
Policy Division
Natural Heritage Branch, Lands and Protected Spaces Branch
300 Water Street, 5th Floor, North Tower
Peterborough, ON
K9J 8M5

**Re: EBR Registry: 012-2835
Provincial Bait Policy Review – Bait Use and Commercial Harvest in
Provincial Parks and Conservation Reserves**

Dear Ms. Hartley:

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 as it relates to the use of bait and commercial harvest in provincial parks and conservation reserves. This policy review is designed to determine measures 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 in Ontario.

The primary purpose of the *Provincial Parks and Conservation Reserves Act, 2006* is to permanently protect the best examples of Ontario's ecosystems and to manage them in ways that ensure their lands, waters, native species and natural processes are maintained or restored. It is therefore necessary for the Provincial Bait Policy to support this purpose.

ORA recommends the following for the policy options provided:

- 1. Fishing with Bait in Provincial Protected Areas**
Option A – Prohibited in provincial parks and conservation reserves.
- 2. Personal Harvest of Bait in Provincial Protected Areas**
Option A – Prohibited in provincial parks and conservation reserves.
- 3. Commercial Harvest of Bait in Protected Areas**
Option A – Prohibited in provincial parks and conservation reserves.
- 4. Storage of Commercially Harvested Bait in Protected Areas**
Option A – Prohibited in provincial parks and conservation reserves.
- 5. Phasing out Commercial Bait Harvest in Protected Areas**
Option A – An immediate stop to bait harvesting operations.
- 6. Where to Apply Policy Options within Protected Areas**
Option A – All waters within the regulated boundary of a provincial park or conservation reserve.

ORA is very grateful for this opportunity to comment.

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance
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