



**ONTARIO
RIVERS
ALLIANCE**

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Ministry of Natural Resources and Forestry
PL1383 Need full name including division, branch and unit Policy Division
Species Conservation Policy Branch
Fisheries Section
300 Water Street
Peterborough, ON
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By Email: Scott.Gibson2@Ontario.ca

Dear Sir:

Re: EBR 012-4222 - Provincial Bait Policy Review - Commercial Sale and Transport, Allocation and Reporting of Baitfish and Leeches in Ontario

Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization acting as a voice for a growing and diverse network of stewardships, associations, and private and First Nation citizens who have come together to protect, conserve and restore healthy river ecosystems all across Ontario.

ORA is pleased to offer input into the *Policy Options for Managing Commercial Sale and Transport Allocation and Reporting of Bait – OMNRF 2015 Draft*.

As the Environmental Commission of Ontario reported in a 2015 report,
*The effects of climate change – including increasing air and water temperatures, decreasing ice cover, and changes in precipitation – will alter Ontario’s aquatic ecosystems. The then MNR noted that the effects of climate change will affect fish distribution, growth, reproduction, and survival....*¹ These changes to Ontario’s ecology will have profound repercussions. Indeed, Ontario’s Biodiversity Council warned that climate change has the potential to dramatically alter our province’s natural environment.^{2,3}

Considering the major economic contributions that our Fisheries and Baitfish industries make to the Province of Ontario on an annual basis, and in the current circumstances we find ourselves

¹ Feeling the Heat: Greenhouse Gas Progress Report 2015, Environmental Commissioner of Ontario

² Ibid.

³ World Bank, report, State and Trends of Carbon Pricing 2014, 2014.



in as a result of Climate Change and the stresses it has and will bring to Ontario's freshwater resources, it is ORA's overall recommendation that the Provincial Bait Policy incorporate the most rigorous and all encompassing mitigation measures possible.

ORA offers the following recommendations:

3.1 - Commercial Movement of Bait

Section 3.6 of MNR's "A Review of Bait Use and Harvest in Ontario's Provincial Parks and Conservation Reserves, 2013" summarizes the situation elsewhere in Canada as follows: "*The use of live baitfish is completely prohibited in the fishing regulations of seven Canadian provinces and territories (Northwest Territories, Yukon, Nunavut, British Columbia, Alberta, Saskatchewan, New Brunswick) and is prohibited with regional exceptions in three others (Manitoba, Quebec, Newfoundland and Labrador) (Dunford 2012) ...*".

Therefore, given the clear ecological threats posed by the possession and transport of live baitfish (as outlined in section 2.2 of the draft report), ORA recommends a ban on live baitfish throughout the province. This would be consistent with policies that are in place in most other Canadian jurisdictions.

Failing this recommendation, our second choice is Option F - Restricting movement of bait by commercial operators to multiple watersheds would offer the highest protection if those watersheds are all located within the same Fisheries Management Zone (FMZ). This would offer enhanced focused control of the spread of invasive species and fish disease.

3.2 - Bait Testing

Option D – Develop a provincial testing program for all bait species, and broaden it to include testing for additional diseases.

3.3 - Commercial Certification and Training

Option E – All commercial bait operators, designates, as well as employees, must receive training.

3.4 - Bait Harvest in Species at Risk Areas

Aquatic species at risk and their habitats should be protected and these designated areas removed from commercial bait harvesting.

3.5 - Where Bait can be Stored in Ontario Waters

Option B – Prohibit storage of bait in sensitive areas.

3.6 - Gear Restrictions

Option C – Develop and implement standard gear requirements across the province.

3.7 - Bait Harvest Area (BHA) Alignment

Option B – Align BHA boundaries to FMZ boundaries.

3.8 - Allocation of Unallocated or Unutilized Resources

1. Unutilized BHAs should be re-allocated in order to ensure the best economic outcome for Ontario.



2. Should have a competitive bidding process for qualified harvesters to procure unallocated or unutilized resources within the province.
3. Baitfishes and leeches should be allocated separately to better utilize the resources.

3.9 - Value of the Resources

Option C – Bait licence fees and BHA fees should completely offset the administration of the commercial bait program.

3.10 - Tourist Licence Types

The Tourist Licence Types' policy as it stands appears to be workable; however, it may be helpful to limit the amount harvested in proportion to the number of harvesters and size of the BMA.

3.11 - Reporting and Record Keeping

1. Commercial harvesters, dealers and sales people must be required to keep daily records that include the location, time, number, and species of bait harvested and sold.
2. All commercial harvesters and dealers should have their vehicles clearly marked to identify their commercial bait operation.
3. Records/receipts must show the number, species, and company from which the bait was purchased.
4. Detailed records must show incidental catches of species at risk and invasive species.
5. The location where bait was caught and different sales points must be included in the bait harvesting records.

3.12 - Bait Compliance Framework

Option C – A provincial demerit point system that would have significant consequences for multiple minor infractions or major infractions. This framework would be less likely to result in shortages of baitfish in some areas.

ORA would like to commend MNRF for its organized and efficient presentation of the draft policy review; and to thank you for this opportunity to comment.

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance