



**ONTARIO
RIVERS
ALLIANCE**

379 Ronka Road
Worthington, ON P0M3H0
LindaH@OntarioRiversAlliance.ca
OntarioRiversAlliance.ca

12 November 2019

Public Input Coordinator – Fisheries Section
300 Water Street
5th Floor, North Tower
Peterborough, ON
K9J 3C7

Via email to: bait@ontario.ca

Re: ERO-019-0518 - Ontario's Sustainable Bait Management Strategy – Draft 2019

Dear Sirs:

The Ontario Rivers Alliance (ORA) is a Not-for-Profit grassroots organization with a mission to protect, conserve and restore healthy riverine ecosystems.

The Ministry of Natural Resources and Forestry (MNRF) is proposing to modernize Ontario's bait management approach to protect Ontario's fisheries and the industries that rely on them, while maintaining flexibility for the industry and anglers.

ORA is pleased to comment on Ontario's Sustainable Bait Management Strategy.

ORA is very concerned that there would be no restrictions to harvesting bait from a wilderness, nature reserve, and/or cultural heritage class park. ORA submits that these areas should be protected from bait harvesting to protect and conserve their unique ecosystem benefits and values.

The Draft Bait Policy document only applies to protections for native Brook Trout populations in MNRF specified lakes; however, their habitat also includes the interconnecting creeks and rivers. It is very possible that invasive species could be introduced through these connecting streams; therefore, the protection of Brook Trout should also be extended to any connecting rivers and creek. The policy direction should include "and connecting streams".

In ORA's view, MNRF has been streamlined and restricted to the point where it becomes very challenging to effectively monitor and enforce any Bait Management Policy. It is also imperative that penalties are a sufficient deterrent and that funding is in place for sufficient staffing to effectively monitor and enforce the policy.

Consequently, ORA makes the following recommendations:

1. Commercial bait harvesting be prohibited in protected areas, nature reserves, wilderness environments and provincial parks.



2. Brook Trout protection should be extended to the interconnecting streams of the MNRF list of specified Brook Trout lakes.
3. Issuance of a fishing license should require that the holder take a short course and be tested in identifying fish species, prevention of the spread of invasive species, as well as angler responsibilities in maintaining sustainable fisheries and waterways.
4. A compliance framework that would entail heavy fines for any contravention of Bait Policy.
5. Sufficient funding to provide MNRF with the means to effectively monitor and enforce the Bait Policy.

The above recommendations are meant to be simple but effective in maintaining a viable commercial baitfish industry, while protecting biodiversity and preventing the spread of additional invasive species and disease into Ontario waters.

Respectfully,

Linda Heron
Chair, Ontario Rivers Alliance
(705) 866-1677