



December 17, 2014

Jason Borwick
Senior Fisheries Biologist
Ministry of Natural Resources and Forestry
Policy Division, Biodiversity Branch
Fisheries Policy Section
300 Water Street, Floor 5
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Peterborough Ontario K9J 8M5

Re: Conservation Ontario's Comments on the "Provincial Bait Policy Review – Angler Use and Movement of Baitfish in Ontario" (EBR#012-2836)

Dear Mr. Borwick:

Thank you for the opportunity to comment on the "Provincial Bait Policy Review – Angler Use and Movement of Baitfish in Ontario". Conservation Ontario is the umbrella organization for Ontario's 36 Conservation Authorities (CAs), which are local watershed management agencies that deliver services and programs that protect and manage water and other natural resources in partnership with others. The following comments are submitted for your consideration based upon a review by staff from Conservation Ontario and Conservation Authorities and follow the outline of the "Policy Options for Managing Angler Use and Movement of Bait" document.

General Comments:

Conservation Authority staff are generally supportive of restricting the movement of bait in Ontario to one or more watersheds to minimize the ecological risks associated with its movement. There are major challenges with utilizing this approach however including: a lack of angler understanding of watershed boundaries, the requirement to have a thorough knowledge of all species present in the watershed, and enforcing the regulations within the context of these known limitations. With these limitations in mind, Conservation Ontario has provided alternative suggestions to limiting bait movement to watershed boundaries, where appropriate.

2.0 Background Information

The background information would benefit from the inclusion of the current policies on baitfish harvest in other North American jurisdictions.

3.1 Policy Options for the Type of Bait used by Anglers in Ontario

Conservation Ontario supports policy Option B – "Reduce the number of legal baitfish species". The species approved for legal use should be of widespread provincial distribution, easy to identify, tolerant of handling and currently used by anglers. This could include species such as emerald shiner; white sucker; creek chub; sculpin species; and finescale and northern redbelly dace.

The list should be reviewed periodically with regard to Species at Risk (SAR) designations. River Darter is included on the list and is currently being assessed for possible SAR status.

3.2 Policy Options for Managing the Scale of Angler Movement of Bait

Conservation Ontario supports policy Option E – “Movement of bait by anglers is restricted to one or more watersheds”. From a biological perspective, restricting the movement of bait on a watershed basis is preferred, as other less restrictive options may allow the introduction of invasive species across the province. As noted in the General Comments section of this letter, limiting movement of bait by anglers to one or more watersheds may be a challenge to promote and enforce. A practical alternative might be to limit bait movement by Conservation Authority jurisdictions where they exist and Fisheries Management Zones where there are no CAs.

The use of watershed boundaries is preferred over Fisheries Management Zones (FMZs), as current FMZs span multiple watersheds (e.g. Zone 16 includes tributaries to Lake Ontario, Erie and Lake Huron). Limiting baitfish movement to a single zone may still allow for the introduction or movement of new invasive species. For example, legal baitfish movement in Zone 16 could allow baitfish access to Lake Ontario, Zone 20. In either scenario, an aggressive educational effort will be necessary to ensure angler buy-in.

3.3 Policy Options for Angler Storage of Bait

Conservation Ontario supports policy Option B – “Angler storage of bait permitted within a defined geographic area (e.g., region, group of FMZs, single FMZ, one or more watersheds) where the bait originated”. The storage of bait should follow the same limitations as described above in Policy 3.2. The policy options should also explore limiting the storage of baitfish that is purchased from a licensed dealer to artificial environments.

As part of any communications regarding angler storage of bait, the illegality and potential consequences of emptying the contents of a bait bucket should be stressed.

3.4 Policy Options for Personal Harvest of Bait

Conservation Ontario’s preferred policy option is Option C – “Personal harvest allowed but bait must be used and stored within the waterbody where it was caught”. As described in the General Comments section of this letter, there are significant limitations with this approach. Enforcement of this policy would require a thorough knowledge of all species present in the body of water being fished, and the ability to identify same, which would present a challenge. If Option C is determined to be too problematic, then Option B – “Personal harvest of bait allowed but must be used and stored within a defined geographic area” is the desired alternative.

A reduction in the number of legal baitfish species will also help with the enforcement of any limitations on the personal harvest of baitfish/leeches.

3.5 Policy Options for Use of Bait by Anglers in Defined Sensitive Areas

Conservation Ontario supports policy Option C – “Bait use is not allowed in sensitive areas”. It is recommended that the definition of “sensitive areas” be expanded to include the habitats of species at risk and areas where invasive species are established.

Thank you once again for providing the opportunity to comment on the “Provincial Bait Policy Review – Angler Use and Movement of Baitfish in Ontario”. Conservation Ontario is supportive of this Provincial Bait Policy Review and is willing to offer the Province its expertise as it moves forward with this exercise. Should you request any further information, please contact me at extension 226.

Sincerely,

A handwritten signature in black ink that reads "Leslie Rich". The signature is written in a cursive, flowing style.

Leslie Rich
Policy and Planning Officer

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