

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 420-D/430/794
December 19, 2014

Ms. Karen Hartley
Senior Protected Areas Ecologist
Ministry of Natural Resources, Policy Division
Natural Heritage, Lands and Protected Spaces Branch
Parks and Protected Areas Policy Section
300 Water Street
Peterborough Ontario
K9J 8M5

Dear Ms. Hartley:

Subject: EBR #012-2835: Provincial Bait Policy Review - Bait Use and Commercial Harvest in Provincial Parks and Conservation Reserves.

On behalf of its 100,000 members, subscribers and supporters and its 725 member clubs, the Ontario Federation of Anglers and Hunters (OFAH) is committed to the conservation of the bait resource in Ontario, as well as to the maintenance of a thriving bait industry and a diverse and fulfilling angling experience. After a review of the posted policy options, the OFAH has composed the following comments:

3.1) Policy options for fishing with bait in provincial protected areas

Angling with live bait should not be restricted in any areas of Ontario without the proper, scientifically-based rationale. Each geographic area of identified ecological concern should be dealt with individually to allow for the proper local consultation and consideration. Simply restricting angling methods due to a park delineation generalizes the process and does not necessarily address the ecological concerns of the protected area. Using this rationale, the OFAH supports the existing policies: Fishing with bait is permitted in conservation reserves, recreational and high intensity use waterway class parks. However, the OFAH would like to reiterate that the classification of an area should not be used to determine the area's sensitivity to the use of live bait. Any classification of park or conservation reserve should be open to the use and harvest of live bait, unless it can be shown that a sensitive aquatic feature would be seriously impacted by these activities.

3.2) Policy options for personal harvest of bait in provincial protected areas

The OFAH supports the existing policies which allow for the self-harvest of bait in provincial protected areas. The OFAH strongly supports the self-harvest of live bait and we believe it to be an important tradition that is critical to the enjoyment of the full spectrum of angling experiences in Ontario. The OFAH is not in favour of restricting angler choice without the proper scientifically-based rationale. If the designation of a sensitive area is due to an aquatic species or habitat that would be critically impacted through the use or harvest of live bait, the OFAH may support restrictions on the use of live bait in that defined area of sensitivity (whether inside or outside a park).

3.3) Policy options for commercial harvest of bait in protected areas

As with the previous policy options, sound, scientifically-based justification should be provided for restrictions on the harvest of bait resources in Ontario. In addition, the appropriate allocations must be made to ensure sustainability of the resource and to ensure continued commercial harvest without the preclusion of recreational anglers. If sensitive aquatic features (species or habitat) are present within a defined area that can be shown to be seriously impacted through the commercial harvest of live bait, the OFAH may support the designation of restrictions in that area.

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3.4) Policy options for the storage of commercially harvested bait in protected areas

The OFAH would not support the restriction of activities related to the bait resource, including the storage (on any scale), without scientifically-justified reasoning. Heavy consideration on the matter of restricting a harvester's ability to store bait should be made, as it would likely result in operational deficiencies and further detriment to the commercial bait industry.

3.5) Timeline for phasing out commercial bait harvest in protected areas

The OFAH supports option B, but only if the commercial harvest or storage of live bait is empirically shown to be putting the ecological integrity of the park or protected area at serious risk. If phasing out is required, there should be a five-year phase-out period to allow for the harvester to adjust their business operations.

3.6) Where to apply policy options within protected areas

As with all of the policy options related to the harvest, use and storage of bait in provincial parks and conservation reserves, each individual park, area or reserve should be considered individually to ensure that restrictions are necessary. Where there are significant concerns that are scientifically-supported regarding the conservation of aquatic resources (baitfish, habitat and general fish community), the OFAH may support restrictions on the harvest, use and storage of live bait in those designated areas. With regards to park boundaries, the OFAH believes that any restrictions that apply within a park should not include any waterbody that is not wholly contained within that park's boundary.

Conclusion:

The OFAH believes that there is no justifiable need to ban the harvest or use of bait in provincial parks and conservation reserves without more comprehensive consideration of the natural and biological features of the area. Provincial parks provide important fishing opportunities in Ontario. These opportunities should not be unnecessarily restricted. If bait policies are overly restrictive, it could limit overall use of the park and reduce revenue for Ontario Park's Special Purpose Account. Each park or conservation reserve should be individually evaluated to determine if there are sensitive aquatic features that would be impacted by the use of live bait. If there is a demonstrated need, then the public and stakeholders should be consulted through park management planning processes. Otherwise, the policies and regulations should be based on provincial policies used in areas surrounding the parks and protected areas.

We would like to thank the Ministry of Natural Resources and Forestry (MNRF) for inviting the OFAH to participate in the Bait Review Advisory Group (BRAG), and the opportunity to provide comments. We look forward to further discussing these topics with BRAG in the near future.

Yours in Conservation,



Tom Brooke
Fisheries Biologist

TB/jb

cc: Jason Borwick, Senior Fisheries Biologist, MNRF
OFAH Board of Directors
OFAH Fisheries Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff

Policy Proposal Notice:

Title:

Provincial Bait Policy Review - Bait Use and Commercial Harvest in Provincial Parks and Conservation Reserves

EBR Registry

Number: 012-2835

Ministry:

Ministry of Natural Resources

Date Proposal loaded to the Registry:

November 05, 2014

Keyword(s): Fish and Wildlife | Water | Protected Areas | Parks | Conservation

The comment period for this proposal is now over.

Description of Policy:

The Ministry of Natural Resources and Forestry (MNR) is undergoing a comprehensive review of provincial bait policies to help improve the management of bait (i.e., baitfish and leeches). There are 5 topics being addressed by the policy review: 1) Angler Use and Movement; 2) Parks and Protected Areas; 3) Commercial Sales and Transport; 4) Allocation; and 5) Reporting. The intent of the review is to determine how the ecological risks associated with the movement and use of bait can be minimized to help maintain healthy fisheries across the province, while also reducing the complexity of current management regimes and increasing business certainty to the bait industry.

The following goals have been established to guide the policy review:
1) Bait is managed to protect the health of aquatic ecosystems.
2) Sustainable use of bait resources enhances the quality of life for Ontarians by providing recreational, social and economic benefits.
3) Bait is managed to conserve the resource and maintain a viable bait industry.
4) Bait management is adaptable, effective, consistent across the province and simple to implement.

For the purposes of this policy review, protected areas refer to provincial parks and conservation reserves regulated under the Provincial Parks and Conservation Reserves Act (PPCRA). These protected areas cover about 9% of the province. Recreational fishing is enjoyed by many visitors to these areas, with about 9% of park anglers reporting the use of live baitfish or leeches. About 8% of the area currently available for commercial bait harvest in the province is within provincial parks and conservation reserves.

MNR is evaluating potential options relating to the following six aspects of the use of bait and commercial harvest in provincial parks and conservation reserves:

- 1) The use of commercially harvested bait for angling
- 2) The use of personally harvested bait for angling
- 3) Commercial harvest of bait
- 4) Storage of commercially harvested bait
- 5) A timeline for phasing out commercial bait harvest in protected areas where this activity is not allowed
- 6) Where to apply policy options within protected areas

Options have been put forward and evaluated based on how well they meet the goals of the review. MNR is soliciting feedback to help inform the review and refine the final policy options.

Purpose of Policy:

Contact:

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To invite comments on the proposed policy options being considered for managing the use and commercial harvest of bait in provincial parks and conservation reserves.

Other Information:

In conjunction with this Environmental Registry posting, a short, online survey has been set up as a way of providing input into the possible range of policy options. The survey includes information about the options, and brief questions for ranking your preferences. The survey can be found at the following link: <https://www.surveymonkey.com/s/BSQ578H>

If you do not wish to complete the survey, the same information about the policy options that is included in the survey can be found at the following link: http://apps.mnr.gov.on.ca/public/files/er/Policy_Options_for_Bait_Management_in_Provincial_Parks_and_Conservation.pdf

The following web links provide supporting information:

<i>Provincial</i>	<i>Bait</i>	<i>Policy</i>	<i>Review:</i>
Information notice advises the public of the provincial bait policy review being conducted by MNR.	Search	ER#	012-1043

Bait use and harvest in provincial parks and conservation reserves addresses topic two of five. Other bait policy review topics will be addressed in separate postings, including: angler use and movement; commercial sale, harvest and transport, and; reporting and allocation. Feedback on the options will assist with the update and development of new policies for bait management in Ontario.

A Review of Bait Use and Harvest in Ontario's Provincial Parks and Conservation Reserves:

This report summarizes information on existing policies and activities related to the use of bait for angling and commercial bait harvest in protected areas. <http://apps.mnr.gov.on.ca/public/files/er/review-of-bait-use-and-harvest-in-ont-protected-areas-2013.pdf>

The Management of Bait in Ontario: A Review

This document provides information on the live bait industry in Ontario, including types of bait used, licence sales and harvest, economics, and the current approaches and challenges to bait management in Ontario and in other North American jurisdictions. <http://www.ontario.ca/environment-and-energy/management-bait-ontario-review>

Risks and Impacts of Spreading Aquatic Invasive Species by the Recreational Use of Bait: A Literature Review (Kerr 2013):

This report reviews the recreational use of bait as a pathway for introducing and spreading aquatic invasive species and potential impacts to fisheries and aquatic ecosystems. <http://apps.mnr.gov.on.ca/public/files/er/the-introduction-and-spread-of-aquatic-invasive-species-through-the-recreational-use-of-bait.pdf>

Provincial Parks and Conservation Reserves Act
http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_06p12_e.htm

Public Consultation:

This proposal was posted for a 44 day public review and comment period starting November 05, 2014. Comments were to be received by December 19, 2014.

All comments received during the comment period are being considered as part of the decision-making process by the Ministry of Natural Resources.

Please Note: All comments and submissions received have become part of the public record.

Other Public Consultation Opportunities:

As part of the Provincial Bait Policy Review, policy options relating to angler use and movement of bait are posted on the Environmental Registry for public comment. ER# 012-2836

Policy options have been developed in consultation with a Bait Review Advisory Group (BRAG) comprised of 13 provincial stakeholders with an interest in bait management. BRAG will continue to be engaged throughout the bait policy review process.

Aboriginal communities and provincial treaty organizations have been informed of the policy review and invited to comment.

Direct written notice of the policy review was sent to stakeholders and other interested groups and individuals. MNRF will seek additional public comment on proposed bait policies in future, as appropriate.

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