

# ONTARIO FEDERATION OF ANGLERS & HUNTERS



*Ontario Conservation Centre*

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Mr. Toby Barrett, MPP, Haldimand-Norfolk  
Parliamentary Assistant to the  
Minister of Natural Resources and Forestry  
39 Norfolk Street North  
Simcoe, Ontario  
N3Y 3N6

Dear Mr. Barrett:

Subject: "This is what we heard." – Bait Roundtable Listening Tour Feedback Compilation

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, conservation-based organization representing 100,000 members, subscribers and supporters, and 740 member clubs. We appreciate your interest and willingness to listen to stakeholders, and your ongoing commitment to seek solutions that carefully consider all relevant perspectives.

We have reviewed the feedback from the bait roundtable listening tour (titled "This is what we heard"), and feel much of the discussion throughout the province centered around concerns we identified in our original submission on the *Strategic Policy for Bait Management in Ontario* (ERO number 012-9791). This proposal will unreasonably limit Ontario anglers, has the potential to create supply and demand issues between industry and bait users, and could negatively impact the livelihoods of baitfish harvesters and business owners; with no guarantee that Ontario fisheries will be further protected. Here we provide additional insight into the bait management conversation, sharing perspectives and strategies to help guide a more logical approach.

### **Enforcement of existing regulations**

Legislation already exists to protect Ontario waters from harmful unwanted introductions of aquatic invasive and non-native species. If there are concerns that current regulations are not performing the way they were intended, then layering additional restrictions for already illegal activities will not achieve the desired effect. The Toronto Police Service employs greater than 5,500 officers (Toronto Police Service, 2019), while fewer than 200 Conservation Officers (COs) are responsible for enforcing fish and wildlife regulations for the entire province (excluding K-9 units, investigation specialists and support staff). There is a clear need to increase the number of COs to ensure adequate enforcement of existing regulations and, as an additional deterrent, increase the set fine amounts for violations.

### **Understanding noncompliance**

Increasing enforcement presence on the landscape accompanied by additional deterrents (i.e. raising set fine amounts) will help protect Ontario fisheries, but the approach cannot stop there. Additional baitfish restrictions are rendered ineffective if they cannot be adequately enforced, but understanding why anglers don't follow restrictions is an equally important aspect. Studies have shown that forty percent of anglers may dispose of their unused bait in surrounding waters out of apathy, a misunderstanding of the regulations, or the misconception that they may be doing something ecologically beneficial (Kilian et al. 2012; Litvak and Mandrak, 1993). Rehabilitating apathetic anglers will be difficult; however, anglers who are uninformed about regulations or the consequences of their decisions (i.e. dumping bait buckets) can be positively influenced.

Angler noncompliance is poorly understood in Ontario, yet it has the capacity to affect the success of bait restrictions and can be a major barrier to achieving fisheries management objectives (Paragamian, 1984; Schill and Kline, 1995). We want Ontario fisheries to be conserved in perpetuity, but also recognize the limitations of legislation. It is important for managers to accept some level of noncompliance as a permanent fixture of our fisheries and to have realistic expectations as to what can be achieved through regulations and policy. There is a need to consider innovative and practical solutions to overcome challenges related to noncompliance, and much of this can be achieved through education, outreach, and awareness; believed to be the “ultimate solution to the problem of unauthorized introductions (Rahel, 2004).”

### **Bait management solutions**

The OFAH has administered a partnership initiative, Ontario’s Invading Species Awareness Program (ISAP), with the Ministry of Natural Resources and Forestry (MNRF) for 27 years and fully appreciates the risk of invasive species to our aquatic resources. We were an active stakeholder participant on the MNRF’s Bait Review Advisory Group during the development of the draft policy for 5 years (from 2013 to 2017), and support the intent to limit the spread of aquatic invasive species and water-borne pathogens, but would like for the MNRF to consider the following:

- Conduct a thorough review of the *draft Strategic Policy for Bait Management in Ontario* to:
  - identify and remove proposals that are already covered by existing legislation, regulations and policies; and,
  - identify and remove proposals that provide little to no reduction in ecological risk.
- For greater clarity, Ontario should:
  - rescind proposed Bait Management Zones and restrictions on movement of personally harvested baitfish;
  - move forward with the removal of some species from the list of permitted baitfish to minimize accidental introductions of invasives that look like native bait species (e.g. sculpins, darters, etc.). Note: Some concerns have been expressed about specific species (e.g. sticklebacks), so we recommend thorough consultation with the industry and recreational anglers;
  - rescind proposed blanket restrictions in protected areas and evaluate each provincial park individually to determine where it is necessary (evidence-based) and practical to prohibit bait harvest, use, and possession; and,
  - update and improve the Hazard Analysis and Critical Control Point training and make the program mandatory for all commercial bait harvesters and dealers (including designates) to minimize misidentification of species at critical points in the bait pathway.
- Re-engage the inactive Bait Review Advisory Group for improved stakeholder consultation and engagement.
- Develop and enhance non-regulatory strategies to address the increasing threats posed by invasive species in Ontario, including restoring investments in education and outreach programs (e.g. OFAH-MNRF Invading Species Awareness Program) and supporting materials (e.g. Baitfish Primer for Ontario, online species identification modules, mobile apps, etc.).

### **Non-regulatory strategies**

The Government of Ontario, through the MNRF, has the potential to introduce or enhance a number of feasible policy and outreach initiatives. These opportunities will signal meaningful action to address concerns related to the bait pathway without unnecessarily compromising recreational anglers and the bait industry. Here are some of our recommendations for how the government can take reasonable action on bait management:

- The Fish and Wildlife Licensing Service
  - The MNRF’s new Fish and Wildlife Licensing Service provides a unique opportunity to improve angler education and outreach on the ecological risks associated with live bait. The licensing system can be used as a platform for disseminating information about specific rules and regulations, associated consequences (i.e. penalties, but also ecological impacts), and the identification of high-risk invasive fish (i.e. “watch list”).

- Fish ON-Line
  - Fish ON-Line is a mobile GIS fishing application (developed by the MNRF) with maps and information on angling in Ontario. It is becoming increasingly popular and is also used for advertisements and newsfeeds. Additional baitfish education, outreach, and awareness can be done through this publicly available tool.
  
- Promote Local Bait Shops
  - One of the perceived concerns with the bait pathway is the purchasing of live bait and the subsequent overland transport (potentially over long distances). This could be addressed by advertising local businesses through an online GIS application like the MNRF's Fish ON-line website. Bait shops could voluntarily sign-up and promote their businesses.
  - Fish ON-line already exists and could be simply updated with bait shop coordinates and additional information such as addresses and hours of operation. Bait shops that voluntarily sign-up may experience economic benefits, anglers' bait will remain in good condition because of less travel time, and ecological risks associated with the overland transport of bait will be reduced.
  
- The Baitfish Primer and Mobile Application
  - The Baitfish Primer is a long-standing guide to identifying and protecting Ontario's baitfishes. The 2018 version is available and is also accompanied by a mobile application free to download. The guide was produced in part by Fisheries and Oceans Canada, MNRF, OFAH and the Bait Association of Ontario (no longer exists). The Government of Ontario, in partnership with the OFAH, should widely promote and share the Baitfish Primer with Ontario's anglers, commercial harvesters, and retailers.
  - This guide could be the basis of targeted education and outreach related to personal harvest, but also be a handy field guide for harvesters and dealers.
  
- Reporting Violations (MNRF TIPS Hotline/Partnership with Crime Stoppers)
  - A successful hotline for reporting resource violations (the MNRF TIPS hotline) already exists. The OFAH-MNRF Invading Species Awareness Program (ISAP) has previously broadcasted the use of the hotline for reporting suspected illegal activity regarding bait. ISAP can be used to deliver targeted messaging for the reporting of baitfish violations to the MNRF TIPS hotline.
  - The OFAH has a history of partnering with Crime Stoppers to deliver education and outreach messaging and provide an additional way to report resource abuse. In the past, OFAH and Crime Stoppers partnered on specific messaging related to baitfish.
  
- Other Education, Outreach, and Awareness Opportunities
  - Develop and enhance non-regulatory strategies to address the increasing threats posed by invasive species in Ontario, including maintaining investments in education and outreach programs (e.g. ISAP) and materials, with small investments in bait-specific messaging where required.
    - online species identification modules;
    - signage at the distribution/retailer level;
    - designated personal leftover baitfish bags;
    - targeted signage at lakes (especially at high-risk locations); and,
    - collaboration with other associations (e.g. cottage, boaters, fish and game, OFAH member clubs, etc.).

**Closing remarks**

Approximately 60-80% of the 1.4 million licensed anglers in Ontario use live bait (personal communications, 2018; MNRF, 2015), equating to 840,000 to 1,120,000 bait users. Anglers contribute around \$2.2 billion annually to the economy and are a fundamental component to the bait industry; valued at approximately \$23 million in 2005 (MNRF, 2017). Bait users and industry are important to the economy; however, stakeholders must also be the stewards of the environment to ensure the sustainability and ongoing productivity of Ontario fisheries.

The OFAH believes that the draft Strategic Policy for Bait Management is not the solution to unauthorized and unwanted introductions of aquatic invasive and non-native species. Increasing enforcement capacity and set fine amounts for already illegal activities, as well as exploring innovative strategies for addressing issues related to noncompliance, will have a much greater impact in the conservation of fisheries across the province.

There should be a focus on finding strategies to enhance the enforcement of existing policies before adding new regulatory approaches that won't be well received by stakeholders and won't have a significant effect in lowering risk.

We offer our continued support for working collaboratively to implement the solutions recommended above. Please do not hesitate to contact me to discuss this topic further.

Yours in Conservation,



Matt DeMille  
Manager, Fish and Wildlife Services

MD/jb

cc: David Hintz, Manager, Fisheries Section, MNRF  
Angelo Lombardo, OFAH Executive Director  
OFAH Fish and Wildlife Staff

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