

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 422/794
July 23, 2019

Mr. Dan Taillon
Ministry of Natural Resources and Forestry
300 Water Street, 5th Floor, North Tower
Peterborough, Ontario
K9J 3C7

Dear Dan:

Subject: ERO 019-0130

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 have reviewed the proposal for amending the Ontario Fishery Regulations (OFR) to allow the use of multiple lines when fishing for Common Carp, and the clarification to existing provisions as they relate to baiting an area (known as 'chumming'). The OFAH has been a long-time advocate for more multiple line opportunities, and amending the regulations for Common Carp is a good first step. We are, therefore, supportive of the proposed changes and respectfully submit the following additional comments for consideration. In particular, we wish to highlight the need to update existing regulations to permit certain baits for chumming, which will strengthen the proposal and provide greater clarity to anglers.

Areas where multiple lines should be permitted

The proposal intends to restrict the use of multiple lines when fishing for Common Carp to Fisheries Management Zones (FMZs) 12 to 20. We agree that angling opportunities for carp are limited in Northern Ontario compared to southern and central areas of the province, but there is no reason to restrict the proposal in this way. Doing so may unnecessarily limit anglers and the associated benefits of multiple lines outside of the proposed FMZs and cause an unintended opposition to the proposal. The OFAH believes that anglers should be able to use multiple lines for Common Carp in all areas where one or two lines are currently permitted (for Common Carp).

Maximum number of lines that an angler should be permitted when fishing

Many Great Lakes states, including New York, Ohio, Pennsylvania, Michigan, Illinois, Indiana, and Wisconsin, offer liberal multiple line opportunities for most sportfish; the majority allow for a maximum of three lines per person.

There is a threshold to how many lines an angler can effectively monitor and manage simultaneously. This number may be self-limiting to an extent, but the maximum should be clearly defined. This will help reduce potential social concerns (e.g. overcrowding, public perception, aesthetics), and could be further supported by requiring the angler to have a clear, unobstructed view of all rods at all times (similar to Ontario's ice fishing regulations). The definition of angling in the OFR makes reference to closely attending rods; however, this may be too subjective for the purposes of multiple lines. Other jurisdictions include language such as "immediate attendance" which would help alleviate some of the aforementioned social concerns, as well as facilitating effective catch and release of non-target species.

Maximum distance that an angler could be from their lines and/or the maximum distance between lines

A possible unintended consequence of permitting the use of multiple lines is that some anglers might occupy an excessive amount of shoreline to the detriment of other anglers. The MNRF should also prescribe the distance an angler would be allowed from their lines and the distance between lines. Anglers should not be permitted to occupy large areas of the shoreline as this would likely lead to restricted opportunities and conflicts with other anglers and potentially the general public. Setting maximum, measurable distances will help with angler compliance and the enforceability of the proposal, while simultaneously ensuring the number of lines remains manageable.

Whether using multiple lines should be permitted when fishing from shore, from a boat, or both

Using multiple lines for Common Carp should be permitted from both shore and boat. We acknowledge that when using multiple lines for Common Carp that the boat would act as a limiting factor with respect to the maximum distances an angler could be from their lines and between lines. However, for regulatory simplicity, it may be beneficial to have a uniform, standardized approach even if fishing with multiple lines for Common Carp from a boat is not commonly practised.

Common Carp bait

The proposal intends to restrict the baits and lures anglers can use when fishing with multiple lines to those that are typically used for Common Carp; specifically, only permitting a sub-set of “organic baits.” However, the MNRF’s Regulatory Guidelines for Bait and Gear Restrictions broadly defines organic bait as: *“Natural bait comprised of live or dead organisms (animals or plants), derivatives, or parts thereof. This can include minnows, leeches, frogs, insects, worms, fish eggs, cut bait, corn, macaroni, pet food, cheese or similar substances.”* The use of the term “organic” in the multiple lines proposal is inconsistent with previous definitions, as the MNRF intends to prohibit many of these baits when using multiple lines for carp. Similar to our suggestion for chumming, it may be simpler to clearly define what baits would be prohibited (e.g. artificial lures, artificial flies, dead fish, baitfish, leeches, frogs, crayfish, worms, and roe).

Existing regulations and chumming

Chumming is a common practice when angling for Common Carp and other fish species in Ontario. Bait is taken from buckets and/or containers and deposited into waterbodies to lure and attract fish. Similarly, there are a variety of carp feeders designed to house and launch bait at far distances for the purposes of chumming. However, there are aspects to chumming that are not adequately defined in the legislation. Section 28 of the OFR states that *“no person shall release live bait or live baitfish, or empty the contents of a bucket or other moveable container used to hold bait or baitfish into any waters or within 30 m of any waters.”* The generic phrasing *“bucket or other moveable container”* in combination with the broad term *“bait”* is ambiguous and confusing. Clarifying the existing regulations will further support this proposal, but will also help explain the rules regarding chumming.

The intent of the regulation on the possession or use of bait is to reduce the risks associated with spreading aquatic invasive species and fish pathogens. The OFAH acknowledges that chumming using “risky” baits such as live or dead fish, baitfish, leeches, frogs, crayfish, and roe should be prohibited and explicitly stated in the regulations. Bait that would be permitted is described in the MNRF’s proposal as “organic, non-animal”; however, this phrasing is too general and unnecessarily restrictive. Including the term “non-animal” would prohibit a number of non-risky baits. For example, anglers sometimes mix animal products into bait such as cheese, eggs, ground beef, hot dogs, pet food, and chicken livers. There is little to no risk in using these ingredients in baits for the purposes of chumming, but the inclusion of “non-animal” would restrict this practice. A more straightforward approach would be to simply list the unambiguous prohibited baits, basing decisions on actual ecological risk, while all other baits would be permitted.

Closing remarks

The OFAH would also like to remind MNRF that they and Great Lakes FMZ Advisory Councils have been reviewing multiple line regulations for a number of years. MNRF Fisheries Policy and Great Lakes management units were committed to taking a strategic approach to consolidating multiple line regulations, engaging Advisory Councils to provide insight and producing a white paper on the subject to guide public consultation. Now that multiple lines for Common Carp is being addressed, there is an opportunity to reinstate the dialogue and public consultation around multiple lines on the Great Lakes, as well as investigating if an appetite exists for more multiple line opportunities with inland FMZs and Advisory Councils. However, this will require MNRF to reinvigorate the Advisory Councils and FMZ management process; many councils have grown stagnant from infrequent meetings, cost cutting, lack of MNRF initiative, and staff turnover. Multiple lines is only a single example of the important fisheries management discussions that could be facilitated through FMZ councils.

In summary, the OFAH supports the proposal with the caveat that updating existing regulations to permit certain baits for chumming is a practical necessity to strengthen the proposal and provide greater clarity to anglers. We look forward to discussing other opportunities with MNRF to address multiple line regulations across Ontario.

Yours in Conservation,

A handwritten signature in black ink, appearing to read 'A. Weir', with a long, sweeping horizontal line extending to the right.

Adam Weir
Fisheries Biologist

AW/jb

cc: OFAH Board of Directors
OFAH Fisheries Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish and Wildlife Services
Mark Ryckman, OFAH Manager, Policy
OFAH Fish and Wildlife Staff