

The Georgian Bay Association (GBA) is an umbrella organization for 19 community associations along the east and north shores of Georgian Bay, representing around 3,000 families. We have been advocating on behalf of our land-owning members for over 100 years and estimate that we reach around 18,000 residents of the Georgian Bay. Our mandate is to work with our water-based communities and other stakeholders to ensure the careful stewardship of the greater Georgian Bay environment.

GBA recognizes the need to revise Ontario's live baitfish regulations in order to provide greater protection for Georgian Bay and adjacent lakes and rivers from invasive species.

The GBA is concerned that many of the proposed approaches to managing the use, sale or movement of live bait may be difficult to enforce should Provincial resources not match the intended goals. GBA recommends that the Province takes steps to address this, including:

- Hiring additional conservation officers;
- Increasing fines for violations of the regulations;
- Promoting the new regulations, once they are enacted, through education and outreach.

Regarding education, we note that anglers and boaters may be spreading invasive species into lakes and rivers unknowingly by using illegal baitfish species, or emptying their bait buckets back into a lake, river or stream, thereby jeopardizing the water quality and future fishing. Such tools as *Ontario's Fish and Wildlife Licensing Service* and *Fish On-Line* could include supporting material explaining the ecological risks associated with using and transporting live bait, as well as a watch list for high risk invasive fish.

As a further step to prevent the spread of disease and invasive species, such as Round Gobies and Eurasian Milfoil, the GBA recommends that the Province consider extending the current regulation that prohibits the practice of anglers discarding unwanted bait and contents of bait buckets within 30 m of any lake or river, to include the same restriction for boats with built-in live bait wells.

GBA also recommends that the current proposal to drop the list of permitted baitfish from 48 to 34 fish species, be further reduced by:

- A. Removing from the list all bait fish that resemble illegal fish species; and
- B. Only allowing native species as permitted bait fish.

This would help ensure the cleanest source of bait possible.

The GBA is supportive of the draft proposals to create Bait Management Zones reflecting the current Fisheries Management Zones, including the restrictions within these zones for the movement of bait in and out of these zones, and the restrictions on the bait harvest, use and storage of bait in provincial parks that are ecologically sensitive and on those lakes and rivers that have native Brook Trout populations.