Possibility grows here.

February 20, 2026

Public Input Coordinator
Ministry of Natural Resources
Biodiversity and Invasive Species Section
300 Water Street, 5th Floor North tower
Peterborough, ON

Re: Greenbelt Foundation comments on ERO #025-1334 Draft Ontario Invasive Species Strategic Plan

Dear Ministry staff,

The Greenbelt Foundation is a long-standing provincial partner organization committed to protecting Ontario's Greenbelt and interconnected natural and agricultural systems. The Greenbelt spans over 2 million acres of protected farmland, forests, wetlands, rivers, and lakes in the Greater Golden Horseshoe. The Greenbelt is a critical and irreplaceable asset that safeguards water resources, diverse natural ecosystems, rural economies, outdoor recreation and tourism, sustainable agriculture and local food systems. Each year, the Greenbelt contributes more than $12 billion to Ontario's GDP and supports over 200,000 full-time jobs.

The Foundation supports the renewal of the Ontario Invasive Species Strategic Plan. Like many other organizations we recognize the critical importance of addressing the immense challenges of invasive species which are affecting critical agricultural, ecological and other systems in the Greenbelt region and well beyond. With the support of the Province of Ontario and other funding partners, we have been able to invest in work to confront these challenges through evidence-based plans and direct on the ground action.

We therefore recognize that a strong, properly funded Strategic Plan is an investment in Ontario's future and key to many aspects of provincial success. Invasive species harm Ontario's biodiversity, agriculture, waterways, and forests, and pose a threat to Ontario's economic and ecological resilience. We therefore support aspects of the Plan focused on prevention, early detection, and rapid response that will protect Ontario's environment and economy. We also support the Plan's priority actions to undertake meaningful engagement with Indigenous governments and increase capacity for Indigenous practices and knowledge, including Two-Eyed Seeing, to address invasive species prevention and management.

While the draft Plan establishes a robust framework for protecting biodiversity, agriculture, and forests within the Greenbelt and beyond, it lacks sufficient detail about funding and implementation. Therefore, the Foundation strongly encourages the Province to ensure sufficient funding is provided for successful implementation at a pace and scale to address the significance of the need and to ensure efficient and effective collaboration between organizations and jurisdictions.

The Foundation provides the following targeted recommendations on the renewed plan:

- **Biodiversity**: Build on provincial tools like the Invasive Species Act and the good work of partners like the Invasive Species Centre to further protect Greenbelt ecosystems and species at risk.
- **Agriculture**: Provide dedicated funding and support to farmers for managing invasive species on farmland, aligned with the Growing Ontario Agri-Food Strategy.
- **Forests**: Prioritize scientifically robust early detection of invasive forest pests alongside public participation, with well-funded education and outreach plans.

Biodiversity

The introduction and spread of invasive species lead to biodiversity loss and ecological disruption within the Greenbelt and beyond. The Greenbelt, for example, contains 721,000 acres of diverse forests, grasslands, and wetlands. Prevention, early detection, and rapid response to invasive species is necessary to protect the biodiversity of these landscapes.

This requires a collaborative approach. As such, the draft strategy rightly emphasizes collaboration between levels of government, Indigenous governments, and non-government organizations. Many conservation authorities operate effectively within the Greenbelt and could further support these efforts through their on-the-ground expertise in prevention, detection, and response. Strengthening coordination among all partners will ensure the strategy's effective implementation.

Legislation like the Invasive Species Act highlights prohibited and restricted species; however, it is not a comprehensive overview of all harmful invasive species that require management. The current strategy recognizes that gap. Recent research completed by the Foundation shows that the Greenbelt's ecosystems protect over 144 species at risk, highlighting the need for an invasive species plan that prioritizes species protections. Complementary provincial measures can build on this foundation to protect biodiversity and mitigate species loss.

Agriculture

Investing in prevention, detection, and response to invasive species is vital to protecting Ontario's economy and food system security. In the face of shifting global pressures, it is critical for Ontario to be increasingly self-reliant by ensuring a sustainable basis for locally grown food and diverse agricultural products. Ontario's agriculture sector risks serious financial impacts from invasive species particularly within the Greenbelt's highly productive agricultural land. Farmland makes up 40% of the Greenbelt and accounts for 53% of Ontario's fruit acreage and 11% of Ontario's vegetable acreage. By managing invasive species, the government can protect the economic competitiveness of agri-business across Ontario and within the Greenbelt.

To support farmers and agriculture, the strategy should address invasive species management on agricultural land, which aligns with the Growing Ontario Agri-Food Strategy. The Greenbelt Foundation recommends providing dedicated funding and support to farmers for managing invasive species on agricultural land. Effective invasive species management protects farms and prevents their spread to larger areas and sensitive ecosystems.

Forests

The Greenbelt contains approximately 182,594 hectares of forest, which covers 24% of the protected lands within it. Forests across the Greenbelt remain under threat from invasive species, such as emerald ash borer and oak wilt. Urban trees, woodlots, and commercial forestry are all at risk. Healthy forest ecosystems are critical to reducing the impacts of climate change like flooding and drought.

Early detection and reporting mechanisms are vital for protecting Ontario's forests from invasive species. This strategy promotes public participation, which may be beneficial in certain instances of introduction and spread. Complementing this with robust, scientifically informed early warning systems would maximize effectiveness. The strategy could clarify how public participation integrates with scientific monitoring tools and techniques. In addition, education and outreach remain important for prevention and response more broadly; however, the current strategy remains vague on how communication and education initiatives will be implemented.

Conclusion

The Greenbelt Foundation recommends that the Province consider three targeted enhancements to the renewed Ontario Invasive Species Strategic Plan:

1. Building coordination among existing partners with on-the-ground expertise in the Greenbelt.
2. Launching a dedicated funding and support program for agricultural landowners.
3. Clarifying how scientific early detection integrates with public reporting, alongside specific programs for education and outreach for farmers and the public.

An enhanced Ontario Invasive Species Strategic Plan that incorporates these measures would help protect the Greenbelt's biodiversity and maintain both the economic competitiveness of its farmland and the resilience of its ecosystems.

The Foundation welcomes further engagement and discussion on this matter.

Sincerely,

Edward McDonnell
Chief Executive Officer