

## Objections/Concerns with the Recommendations in the City Report on Drug Strategy, Housing & Homelessness

Point 1 Housing First/Human rights Human rights are \*not\* hierarchal, and they are not absolute. IOW, while it is legal to provide targeted services for specific groups, it's not to completely ignore the Charter & human rights of others, especially if they are in conflict, (a competing rights situation) or will be violated by adopting these policies/projects. This is not reflected in any of the gov't or non governmental organizations involved in any aspect of this report or larger issues of drug policy, community safety and equitable housing provisions.

The City staff should consider the potential human rights implications for \*all\* citizens, including security of person under the Charter. The County, social service groups and the city have ignored rights issues on specific projects, even going so far as to claim they couldn't consider by-law and Official Plan requirements on neighbourhood compatibility and community safety due to human rights, but they never provided any rationale, cited relevant OHRC statutes, or produced any neutral 3rd party report on this.

There was \*no\* public mandate or democratic development process for drug strategy in Guelph. Housing First is drug strategy, not housing-it targets 'chronically homeless' drug users, providing on site consumption sites and in some cases safe supply, which is controversial. This is not the jurisdiction of the County as a social housing provider, as they're publicly stated in the past. Despite the County Director saying they will accept it in later council submissions, that doesn't make it so. The fact that recommendation 6 is the Ontario Health Team is being considered as a group to work with supportive housing providers on funding is a tacit admission this is not county jurisdiction.

Housing First 'wrap-around services' are \*not specifically defined\* by the county or the city, and were not for specific supportive housing projects. The actual 'wrap around support' that is present in all supportive housing is a low barrier consumption site(s) in residential buildings for drug users who are chronically homeless due to problematic drug use. (This not all users or homeless, but a sub-set)

The City is recommending that low barrier drop-in and/or consumption sites be put in the downtown core and throughout the city as 'supportive' housing projects under this Housing First model. (This is eventually as-of-right, i.e no development permissions/requirements/bylaws needed) w/no consideration of negative effects, issues in other areas with equivalent policy/facilities, or impacts on businesses, the general public or those in marginalized OHRC status groups, like the elderly and disabled. There is also zero consideration for the lived experience of those already dealing with de facto consumption sites at County managed buildings where there have already been issues and major incidents.

The drop-in zero barrier consumption site has been tried in slightly different form without success, but is again shrouded in secrecy. The 'drug recovery space' (mainly for meth users) went from the hospital, to the community health centre, to the [then] Drop-In Centre (now Stepping Stone), to being cancelled due to "lack of staff" [pre-covid]. There was no explanation or public report on outcomes, potential issues and no accounting I could find in media or the City of Guelph website explaining the closure or what happened to the \$625,000 of funding-some from municipal coffers, i.e. the taxpayers.

The Collective Results report should not be used to guide major broad projects a/o policy on this, as it is limited in scope and only includes a small number of interviews and is totally qualitative, with no data validation by the report writers. It is biased towards harm reduction.

Points 2 & 4: re City/Council and County relationship—having city councillor(s) a/o the Mayor sit on County committees/entities that develop then vote on policy, process and projects effectively creates a Regional government tier, something noted in the Collective results report: “The City of Kitchener is particularly relevant to the City of Guelph as the Region of Waterloo serves as the Consolidated Municipal Service Manager for housing services, just as the County of Wellington does for the City of Guelph.” What the report didn’t mention is that the Region of Waterloo tier has elected representatives. The City of Guelph and County are doing this without public mandate and/or citizen representation-particularly Guelph.

3. Housing Symposium- excludes the public and anyone who does not agree with the social justice/harm reduction approach, basically it’s a rehash of the Homelessness Task Force, which had major problems, including the narrow, exclusionary focus of the Collective Results Report. The Collective Results report came out of a recommendation from the Homelessness & Community Safety ETF. This is a closed group formed & appointed by the mayor, consisting of advocates of social justice based harm reduction, latterly business and developer interests. (This includes the county) It totally excludes the public, and TMK, any group with lived experience that disagrees with this approach a/o advocates for an evidence based treatment facility focus.

The two positions initially earmarked for the “public” were instead filled by lived experience harm reduction advocates. They were part of the group that recommended a “Welcoming streets initiative” which at least one worker ended up being hired for (as a paid position). In later iterations of the ETF, there are no public slots available at all.

The Downtown Advisory Group was secreted \*within\* this ETF instead of a stand alone advisory committee, like accessibility, Heritage, etc. Why? As such it is not held to the same level of transparency, and does not allow members of the public to apply to serve terms. They are also not required to equitably or generally engage the public re: issues of public safety in the Downtown area.

All of the recommendations of the ETF/DAG, including commissioning the Collective Results Report, and funding the Mission, do not directly address public order and safety issues they were supposed to. TMK, this is the only 3rd party report commissioned by a related committee, task force, etc. or local government re: conditions & related services in the downtown core. However, it totally excludes anyone outside the members of Harm reduction advocacy groups who have a direct conflict of interest, as they owe their funding, jobs and identity to this policy continuing to be implemented.

#### Point 7 Developer Donated Land

This is a serious potential conflict of interest to have developers with projects before the City Committees and Council to also donate land for these projects. Again, it’s behind the scenes with no public mandate, but there will be no transparency on projects on the developer’s end.

Thank you for your consideration

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