



GBA+
Diversity & Inclusion



Edmonton

GBA+ REPORT

PROJECT/INITIATIVE NAME: ELS02103rev - Bylaw 20700 - Public Spaces Bylaw - Additional Information

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LAND ACKNOWLEDGEMENT

The City of Edmonton acknowledges the traditional land on which we reside, the public spaces we share, and the natural community resources we enjoy are in Treaty Six Territory. We would like to thank the diverse Indigenous Peoples whose ancestors' have gathered, connected, and celebrated in these spaces for centuries, such as nêhiyaw (Cree), Dené, Anishinaabe (Saulteaux), Nakota Isga (Nakota Sioux), and Niitsitapi (Blackfoot) peoples. We also acknowledge this as the Métis' homeland and the home of one of the largest communities of Inuit south of the 60th parallel.

City of Edmonton employees who have worked on this report take their roles as Listeners, Connectors, Advocates, and Partners with Indigenous Peoples seriously as we work towards promoting the ongoing vibrancy, sustainability and equitable enjoyment of public spaces within this traditional land. We work towards creating a welcoming place for all peoples who come from around the world to share Edmonton as a home. Together we call upon all of our collective, honoured traditions and spirits to work in building a great city for today and future generations.

1. DESCRIPTION OF PROJECT OR INITIATIVE

The Public Spaces Bylaw project aims to consolidate and replace the City's three primary public spaces bylaws: Bylaw 2202 - Parkland Bylaw; Bylaw 8353 - Conduct of Transit Passengers Bylaw; and Bylaw 14614 - Public Places Bylaw. Through the proposed Public Spaces Bylaw (Attachment 1), Administration is attempting to maximize the accessibility of public spaces for all, while minimizing tension and safety concerns caused by incompatible uses; balance the needs of all users to ensure that the needs and concerns of Edmontonians are prioritized equitably; and identify opportunities to minimize the penalization of poverty. On February 14, 2024, City Council passed a multi-part referral motion directing Administration to complete a comprehensive Gender-Based Analysis Plus (GBA+) report, among other activities - this GBA+ Report responds to part 1(A) of the motion.

2. OVERVIEW OF GBA+ IMPACT

Initial review of the February 2024 Draft Public Spaces Bylaw identified sections that would pose barriers to inclusion and disproportionately impact equity-deserving groups.

Individuals who are perhaps most disproportionately impacted by a bylaw regulating public spaces include those experiencing houselessness and poverty. With houselessness and poverty being a common factor, equity-deserving Edmontonians from many backgrounds make use of public spaces due to necessity, as research shows that houselessness is directly correlated with other equity-deserving identity factors. Nearly 60 per cent of individuals who are unhoused self-identify as Indigenous. Women and gender-diverse people make up approximately half of the population, and nearly 26 per cent are children and youth (ages 0 - 24 years old). Seniors, recent refugees, racialized individuals, female lone-parent households, Indigenous households, and people with physical and developmental disabilities are at the highest risk of houselessness and housing need. LGBTQ2+ people are also more likely experience houselessness - a 2018 Statistics Canada survey found that LGBTQ2+ Canadians were more than twice as likely as their non-LGBTQ2+ counterparts to have experienced some type of homelessness or housing insecurity in their lifetime (27 per cent vs. 13 per cent, respectively).

The following focus areas from the February 2024 Draft Public Spaces Bylaw were identified as having the most potential disproportionate impact on equity-deserving Edmontonians:

- *Part VI - Consumption of Substances - Visible Drug use*
 - Summary of provisions: smoking in indoor and other designated public spaces is not permitted; consumption of alcohol in public spaces outside of designated picnic areas

and licensed premises is not permitted, in alignment with provincial legislation; visible use of controlled substances in public spaces is not permitted.

- Summary of impacts: these provisions may disproportionately impact people experiencing houselessness, as they do not have access to private spaces in which to use drugs. While controlled substances remain illegal according to provincial and federal law, the Public Spaces Bylaw would not apply to people using substances in a privately owned space.
- *Part VII - Fire and Fireworks*
 - Summary of provisions: a person cannot start or allow to remain lit a fire in a public space.
 - Summary of impacts: this provision may disproportionately impact people experiencing houselessness, as they may rely on fires for warmth.
- *Part VIII - Inappropriate Actions and Behaviours*
 - Summary of provisions: inappropriate use of transit space, remaining on transit property while engaging in behaviours unrelated to using transit is not permitted; behaviours in all public spaces that interfere with the safety or comfort of others are not permitted; aggressive panhandling is not permitted within a roadway, on a median, between roadways and on a boulevard adjacent to a roadway.
 - Summary of impacts: these provisions may disproportionately impact people experiencing houselessness who rely on indoor public spaces for temporary shelter, or who rely on panhandling as a source of income.
- *Part IX - Performances and Gatherings*
 - Summary of provisions: gatherings of more than 50 people require a permit to ensure adequate civic services can be provided; performances are allowed in transit spaces without a permit as long as they remain within a designated area for safety; amplification is not permitted in public spaces, with exceptions for life-safety systems, ambient music, and permitted events
 - Summary of impacts: these provisions may disproportionately impact people whose voices have historically been underrepresented, such as women, racialized people, 2SLGBTQI+ individuals, and other people who face discrimination. In addition, people experiencing lower incomes may rely on the use of amplification for income.
- *Part X - Protection of Public Spaces*
 - Summary of provisions: encampments and temporary shelters not permitted in public spaces; urination and defecation not permitted in public places.
 - Summary of impacts: these provisions may disproportionately impact people experiencing houselessness who rely on encampments in public spaces for shelter, who do not have access to washrooms or who rely on panhandling as a source of

income.

- *Part XIV - Vehicles*
 - Summary of provisions: bicycle, e-bicycle and e-scooters not permitted on sidewalks; bicycle, e-bicycle, e-scooter, inline skates, roller skates, or skateboard are not permitted in a park, except on a shared pathway or within a skate park or bicycle park; motor vehicles are not permitted to be parked overnight in a park.
 - Summary of impacts: these provisions may disproportionately impact vulnerable road users, including cyclists, as well as people who are underhoused and rely on vehicles as temporary shelter.
- *Part XV - Enforcement*
 - Summary of impacts: monetary fines may have a disproportionate impact on persons experiencing poverty, as they lack the means to pay fines.

Recommendations identified in section 6 of this GBA+ Report balance the need for public safety and inclusivity, taking into account the diverse needs, dignity and circumstances of individuals who may be engaging in the activities restricted and regulated by the Public Spaces Bylaw.

3. REFLECT

The core Public Spaces Bylaw Project Team (the Project Team), which includes City of Edmonton employees from Legal Services and Workforce Safety and Employee Health Branches, regularly participated in conversations around equity and barriers to inclusion within the communities that the City of Edmonton serves as new engagement data, feedback, and nuances within the scope of the bylaw came to light. Project Team members reflected on their own identities, stereotypes and biases, and had multiple discussions on perspectives that are missing and how those can be included. Particular emphasis was given to those that are disproportionately impacted by the proposed Public Spaces Bylaw.

Throughout the research, engagement and drafting process, the Project Team sought to identify unintended impacts of the proposed bylaw, and explore ways to mitigate these impacts or redefine the bylaw's intended scope. Some examples of discussions to address systemic issues, within and outside the scope of the bylaw are outlined below:

- Temporary shelters and encampments: Edmonton has sufficient shelter capacity to have persons shelter indoors, and the shelter capacity can increase during extreme weather. Sheltering outdoors has multiple risks beyond extreme weather. In reality, people do choose to shelter outdoors, in spite of emergency shelters having capacity. This may be because some shelter spaces are perceived as unsafe or have incompatible policies, particularly for

women, couples, or people with pets, as examples. There is no overall “solution” for outdoor sheltering that can be addressed by bylaw regulations alone. Questions for consideration included: *How can the City ensure that the bylaw enables equity measures?*

- Criminalization versus regulation: Throughout the Public Spaces Bylaw discussions and engagement activities, the term ‘criminalization’ has been used to refer to different impacts on equity-deserving groups. From a legal perspective, the City does not have the authority to criminalize, but through the *Municipal Government Act* does have authority to regulate behaviours through municipal bylaws. Bylaw tickets are not criminal and do not lead to criminal charges, but can increase in severity for repeat offenders. Higher fines can be issued for more serious conduct. For example, if a bicyclist riding on sidewalk leads to a serious pedestrian injury collision, a Part 2 ticket¹ could be issued to compel an appearance before the court and impose a higher fine.

4. RESEARCH

Research sought to identify best practices and leading research on identified focus areas of the draft Public Spaces Bylaw, identified in section 2 of this GBA+ Report. Some recommendations are unable to be resolved by a municipal bylaw, may not fall within municipal authority, or may be cost prohibitive. Nonetheless, these recommended practices have been identified to provide a full picture of the research findings.

The research sources are referenced at the end of this report and include qualitative, academic, and community based publications; community advocacy reports; and jurisdictional scans to ensure a broad understanding of impacts and determine leading best practices. This research lays a foundation on a way forward that considers safety and dignity of everyone within our communities. Below are the findings from research conducted under each focus area identified (with the exception of Part XV - Enforcement, which is embedded into other focus areas):

Part VI - Consumption of Substances (Visible Drug Use):

- Research supports that drug use prohibitions disproportionately impact equity deserving groups. Prohibiting visible drug use without proper public health infrastructure, and a lack of any alternative locations for unhoused individuals to consume drugs safely, puts equity-deserving groups at risk of using drugs in secluded locations leading to drug poisoning deaths. Leading practices identified:
 - Public health approach: Have drug laws and policies that prevent, reduce and respond

¹A Part 2 ticket refers to a ticket issued under Part 2 of the *Provincial Offences Procedure Act*, and may be issued by a peace officer when the public interest warrants appearance before the court and/or the possibility of a penalty greater than that prescribed by the bylaw.

to the potential harms of drugs while also respecting human rights and promoting health and wellbeing. Supervised consumption sites may offer a range of evidence-based harm reduction services, such as drug checking. These sites also provide access to important health and social services, including substance use treatment for those who are ready.

- An integrated approach includes a variety of arrangements among different organizations to coordinate or collaborate to ensure a comprehensive range of approaches to a given problem. For example - interagency collaboration among enforcement, health and social service providers to respond to and support substance users. The goal of an integrated approach is to efficiently and effectively make use of each agency's unique capacities and resources in order to promote overall health and public safety in a community.

Part VII - Fire and Fireworks

- Prohibiting open fires in all public spaces disproportionately impacts Indigenous communities by creating barriers in their access to Ceremonial and Sacred Fires. Designating such sites are supported by articles in the *United Nations Declaration on the Rights of Indigenous Peoples* and the "Calls to Action" in the *Truth and Reconciliation Commission's Final Report*. They are also aligned with the City's Indigenous Framework. Leading practice and jurisdictional scan:
 - The City of Toronto has designated sacred fire sites in parks for Indigenous Sacred Fires. Currently, Edmontonians seeking legally sanctioned fires must submit a request for a permit to be issued by Edmonton Fire Rescue Services (EFRS).
 - In the City of Edmonton, Kihcihkaw askî-Sacred Land provides a natural setting for Indigenous peoples, groups, and communities to host ceremonies, sweat lodges and facilitate intergenerational learning.

Part VIII - Inappropriate Actions and Behaviours

- Heavy regulation of public transit space may disproportionately impact those experiencing houselessness, as indoor transit spaces are sometimes used by unhoused people to shelter from the elements.
- ETS riders are also made up of equity-deserving individuals. According to ETS' 2023 Annual Report Customer Satisfaction report, out of 3,000 ETS rider survey respondents, 20 per cent of survey respondents reported being a racialized minority, 14 per cent reported having a disability, and 9 per cent reported being Indigenous. In the same report, overall satisfaction saw a significant decrease, with the largest significant decrease in satisfaction being sense of safety and security (fell by 13 percentage points). When asked what safety and security concerns influence ridership most, respondents indicated negative or dangerous behaviour

from other passengers on substances, loiterers and unhoused people.

- Preventing panhandling involves first understanding panhandling concerns within the municipality. It is important to note that non-aggressive panhandling itself is not prohibited by the draft Public Spaces Bylaw. The Public Spaces Bylaw is aimed at aggressive panhandling and panhandling on a road right-of-way, where the activity poses overt safety concerns in both instances. Aggressive panhandling is legally defined within the Bylaw with indicators.
- The City of Calgary has a panhandling bylaw (Bylaw Number 3M99) which protects both members of the general public and panhandler. In the bylaw, panhandling: is not allowed within 10 metres of bank entrances, automated teller machines (ATMs), transit stops, or pedestrian walkways (excluding sidewalks); is prohibited between 8 p.m. and 8 a.m.; must not block or follow people being solicited; must not solicit money from occupants in motor vehicles; must stop engaging with individuals who decline solicitation.
- Other strategies to address panhandling include: providing a warning and fines to only repeat offenders. Identifying key areas where panhandling takes place, and identifying legal spaces for panhandling to occur.

Part IX - Performances and Gatherings

- Regulations related to amplification systems and gatherings are closely related to the rights of expression and peaceful assembly guaranteed under the *Canadian Charter of Rights and Freedoms*. While municipalities may lawfully limit amplification and regulate gatherings, too many restrictions on the right to protest and or gather can lead to the silencing of historically underrepresented voices.
- In the City of Vancouver *Charter* or “rights” activities, such as protest, rallies, and demonstrations, do not require event permits; permits are required for amplified sound systems in any parks.
- Calgary has a *Safe & Inclusive Access* (Bylaw Number 17M2023) which permits and prohibits certain types of protests to occur in and around public spaces. While these demonstrations are still permitted, they must not be within 100 metres of an entrance to a recreation facility or library, or block access for others to enter or exit a recreation facility or library.

Part X - Protection of Public Spaces (Outdoor Sheltering; Urination and Defecation)

- A punitive approach to outdoor sheltering and encampments does not address the underlying experiences and challenges faced by unhoused persons.
- Locational data collected by the City of Edmonton show that encampments disproportionately impact vulnerable neighbourhoods, including communities with socio-economic challenges or a higher than average percentage of equity-deserving groups.
- While encampments can provide rudimentary shelter from the elements for people who are

unable to access indoor shelter, data has shown that outdoor sheltering in Edmonton's winter climate frequently leads to severe injury or even death.

- The City of Edmonton's Homelessness and Housing Services Plan describes the City's role in addressing and ending homelessness. It outlines the purpose and function of the City's involvement, aligned with the 2024 Community Plan to Prevent and End Homelessness and City of Edmonton's Affordable Housing Strategy (2023-2026).

Outdoor sheltering - practices for consideration:

- Use an integrated approach to encampments that respects the dignity of unhoused persons while supporting the safety and wellbeing of people and property in public spaces and the protection of property in surrounding communities.
- Meaningful participation with unhoused persons and communities over-represented amongst the unhoused is critical.
- Consider a pilot "designated encampment zone" or offer alternative shelter structures ("tiny homes"). The City's cost estimate in 2022 for a sanctioned encampment estimated the cost would be approximately \$2.0M for each three month period of accommodating sixty (60) tents. (July 4, 2022 report CS1347, Small Scale Sanctioned Encampments).
- Some municipalities in other jurisdictions have adapted their bylaws to allow limited use of public space for outdoor sheltering. For example, allowing people to stay overnight in certain public spaces, so long as the tents or shelters are removed by a certain time in the morning. Bylaws can limit outdoor sheltering to specific times and in specific locations, Such as in Victoria and Abbotsford, BC.
- Some municipalities provide harm reduction support to encampments to manage health and safety, particularly as a temporary measure where there is an absence of available shelter spaces.
- Provide low rent, alternative housing options: This includes short-term options, such as investments in modular housing and suitable shelter spaces, and longer-term investments in social and affordable housing.
- Public urination and defecation laws can disproportionately impact the houseless population. When public washrooms are unavailable, many homeless individuals urinate or defecate in public out of necessity. The City of Edmonton does have a Public Washroom Strategy which aims to improve accessibility to public washrooms for all Edmontonians, including equity-deserving groups.
- Most large municipalities have bylaws that prohibit public urination. Fines for offenders range from \$200 to \$900, the latter given to repeat (three) offenders in Wolfville, N.S.
- The City of Waterloo offers accessible and self-cleaning public washrooms.
- Leading practices include providing access to public washrooms - both temporary and

permanent on a 24/7 basis; public-private partnerships with local businesses and Business Improvement Zones to encourage private businesses to open their washrooms to the public or install their own temporary public washroom facilities.

Part XIV - Vehicles

- Living out of motor vehicles is a form of sleeping rough, representing a housing need. Edmonton has declared a homelessness emergency and the safety of those sleeping rough should be considered.
- In the City of Edmonton's Bike Plan, the City does acknowledge that many cyclists prefer to share the sidewalk with pedestrians due to high traffic volumes and speeds that would otherwise make biking dangerous. Additionally, some areas lack biking and active transportation infrastructure. The City is expanding bike facilities significantly through the Active Transportation Implementation Acceleration program, the Neighbourhood Renewal program as well as to some extent through Safe Mobility programs.
- In Calgary, shared e-scooters are permitted to ride on sidewalks. If sidewalks are busy, E-scooters can ride on pathways and/or bike lanes. Bicycles are not permitted on sidewalks (except for persons under 14 years of age)
- The City of Ottawa, and the City of Vancouver do not allow bicycles and e-scooters on sidewalks.

5. ENGAGE²

GBA+ work for a Public Spaces Bylaw of this significance involves engagement, especially with groups or community members who are, or could be, unintentionally and disproportionately impacted by provisions of the bylaw. In light of several unique considerations, Administration developed a modified engagement strategy, using GBA+ methodology, to ensure that the feedback of equity-deserving groups is captured. The first consideration was that extensive public engagement already occurred during the development of the February 2024 Draft Bylaw (see Attachment 3), which includes extensive demographic data. Secondly, at the February 14, 2024, City Council Public Hearing impacted persons had an opportunity to express feedback and share their experiences, and Council discussions in relation to the referral motion indicated that Council members were not seeking a lengthy secondary round of external engagement. Finally, the Public Spaces Bylaw project team was mindful that further external engagement with equity-deserving people and groups could

²This section includes feedback received from engagement participants on the focus areas of the draft Public Spaces Bylaw. The City of Edmonton values the lived experiences of engagement participants, and so the report authors have included statements and opinions even where factual verification is not possible. The facts and opinions expressed in this section do not necessarily reflect the approaches or policies of the City of Edmonton. Where contradictory perspectives are offered by consulted parties, or where additional context can be provided, the authors have provided a brief explanation and a source.

result in engagement fatigue with stakeholder groups that represent or service equity-deserving community members.

The modified engagement strategy for this GBA+ report collected engagement findings through four distinct streams:

- *Previously completed City engagement projects*, including engagement completed for the first draft of the Public Spaces Bylaw (see Attachment 3), and also incorporates public engagement findings collected through other City engagement projects touching on topics that can reasonably be applied to the Public Spaces Bylaw.
- *Engagement with public-facing City of Edmonton employees* who frequently interact with equity-deserving groups and people with lived experience through the regular course of their work. This targeted engagement occurred from August to October, 2024, and included developing a written engagement package and hosting engagement sessions with different teams of City employees who are involved in service delivery in public spaces.
- *Reviewing feedback from City-affiliated Council advisory groups*, including the Edmonton Transit Service Advisory Board (ETSAB), the Accessibility Advisory Committee (AAC), the City of Edmonton Youth Council (CEYC), the Women's Advisory Group of Edmonton (WAVE), and the Community Services Advisory Board (CSAB).
- *Analysis of the speakers' comments from the City Council Public Hearing where the February 2024 Draft Bylaw was presented*, during which over 50 speakers from various backgrounds provided a variety of feedback, from a diverse range of perspectives, on the draft bylaw.

Below are the key findings from the engagement activities listed above - with overarching themes and key concerns provided first, followed by detailed feedback on each of the seven focus areas that were identified as likely having disproportionate impacts on equity-deserving groups.

Engagement Findings - Overarching Themes and Key Concerns

Findings from previously completed engagement projects by the City of Edmonton focused on encampments, enforcement, and visible drug use, as did findings from the engagement with public-facing City employees. Overall, these engagees shared leading practices to address key impacts on equity deserving groups. The practices shared align with the research section of this report. Key concerns from these engagement streams included:

- Impact on equity-deserving groups, including implementation of the bylaw and enforcement practices, particularly around discretionary enforcement.
- How the bylaw will be communicated, including the implications of enforcement on equity-deserving people, exceptions, and expectations around the bylaw for the general public.

- Safety of frontline workers, including Peace Officers, as well as families with children, and for people who use public spaces for their intended purpose.

The key concerns from analysis of the 50+ speakers who attended the February 14, 2024 City Council Public Hearing are summarized as follows:

- Many speakers felt that the initial draft of the bylaw was overly restrictive in nature, utilizing stringent measures such as fines for behaviors that cannot be avoided or do not have any alternatives. Speakers expressed the opinion that the bylaw criminalizes poverty - focusing too heavily on regulating behaviors in public spaces rather than addressing the underlying issues of mental health, addiction, homelessness and poverty. These prohibitions on behaviors work to criminalize unhoused, Indigenous, racialized and equity-deserving groups.
- Speakers indicated that integrating the Truth and Reconciliation Commission's Calls to Action, the United Nations Declaration on the Rights of Indigenous Peoples, and the Missing and Murdered Indigenous Women and Girls Calls for Justice into the new proposed bylaw will support the elimination of systemic racism, and remove systemic barriers for Indigenous people.
- Without additional or improved public health infrastructure such as supervised consumption sites, shelter space, supportive housing and other civil supports, prohibited behaviors will merely be shifted or moved to more hidden and secluded spaces. This may result in these activities being more unsafe for both the people engaging in them and bystanders.

Engagement Findings - Detailed Concerns by Focus Area

Part VI - Consumption of Substances (visible drug use)

- Engagement findings from previously completed City projects noted the opioid crisis as increasing in recent years, with concerns around increased incarceration of individuals experiencing homelessness.
- Supervised consumption sites are still in need. People are choosing to smoke rather than injecting due to supervised consumption services being closed.
- Engagement participants suggested having supervised consumption sites near transit locations, and dedicated receptacles for used paraphernalia.
- Many service workers (City employees) noted the increase of preventable deaths from drug poisoning.
- Suggestions from public-facing City employees included Peace Officers being given more authority under the *Controlled Drugs and Substances Act*. This is crucial for them to have lawful placement to intervene and address behaviors, especially around the display of drug paraphernalia, that could interfere with the safe enjoyment of public spaces.

- Community Outreach Transit Teams (COTT) were noted as beneficial for supporting paths to recovery and rehabilitation.
- Speakers at the February 14, 2024 City Council Public Hearing indicated concerns that the proposed bylaw prioritized perceptions of safety over actual safety. For example, by prohibiting visible drug use without adequate public health infrastructure, speakers said the bylaw put equity-deserving groups at risk of drug poisoning in hidden or secluded places. A frequently mentioned concern regarding the prohibition on visible drug use is that it carries the risk of increasing drug poisoning deaths due to isolation and lack of support.
- Some speakers indicated that some sections of the bylaw duplicated existing provisions in the Criminal Code, potentially blurring the line between municipal regulations and criminal law. Some commented that such overlap could lead to inconsistencies in enforcement and unintended consequences³.
- Some speakers suggest additional supervised consumption sites where groups can use drugs safely, out of community and business spaces.

Part VII - Fire and Fireworks

- Engagement participants from previously completed City projects and public-facing City employees noted that not all parks have non-combustible surfaces, and access to water for putting out fires is challenging, even in designated areas; types of wood used should be regulated, deadfall and tree branches should be prohibited; within the bylaw, reference to cooking fire is unclear and there were questions around usage of portable propane fire pit or other Canadian Standards Association (CSA) approved cooking appliance.
- Considerations must be in place for Indigenous ceremonies.
- All fire related activities must still be licensed as per National Fire Code.
- As part of certain Asian burial practices, families or patrons may offer a fire-type burning for their loved ones in remembrance. Some municipal cemeteries have specific vessels for such activities that are available on a request basis, and report authors recommend that the City of Edmonton follow suit by including this practice for families or patrons who request it, while adhering to any fire ban directives

Part VIII - Inappropriate Actions and Behaviours (Inappropriate use of Transit Space)

- Engagement participants from previously completed City projects and public-facing City employees emphasize that transit spaces must remain safe, functional, and accessible for their primary purpose while also addressing any impacts on individuals who may be using these spaces for alternative reasons.

³Administration notes that municipal bylaws serve a different purpose from the criminal law and can target a different aspect of the conduct - in this case the public health and safety concerns associated with public drug consumption.

- There is a need to be considerate of equity-deserving populations and where they will shelter or relocate without access to transit spaces. Some engagement participants suggested that some people have received multiple bylaw tickets a day, particularly individuals who are racialized, Indigenous people, and other equity-deserving individuals.
- There are concerns around definitions of behaviours unrelated to transit use, and inequitable enforcement, such as calling of the police or the use of force towards equity-deserving or racialized individuals.
- Partnerships such as COTT are a useful tool to ensure safety of passengers and help equity-deserving users get the resources they need. Increased funding and development of other similar partnerships is recommended.
- Speakers at the February 14, 2024 City Council Public Hearing pointed out that equity-deserving groups use transit to shield from harsh weather. While some acknowledged that the purpose of public transit is not to provide shelter, speakers maintained it is the City's responsibility to provide alternate shelter support. Speakers advocated that penalizing equity-deserving groups for survival behaviors is inhumane and exacerbates problems.
- Some speakers expressed doubt and concerns regarding enforcement overall and discretionary enforcement, asking how the bylaw will be enforced, and in what instances. An example provided was that Peace Officers lack authority to make arrests for outstanding warrants.
- Some speakers agreed that the bylaw addresses the current reality which is that law abiding Edmontonians feel unsafe and uncomfortable using transit when confronted with disruptive activities like drug use, vandalism, and other illicit behaviors. Speakers suggest establishing a robust strategy to address safety concerns for both transit workers and transit passengers. Speakers also express that the bylaw needs stronger enforcement, including increased resources, training, and authority for Peace Officers to enforce bans and maintain safety.
- With regard to panhandling, speakers felt that more people are turning to panhandling, and suggested this was the result of the housing crisis and the rise of inflation. It was felt that the current bylaw as it stands does not consider this. Most speakers addressing this issue noted the "aggressive" label used in the bylaw – most do not recount their experiences with panhandling as aggressive⁴.

Part IX - Performances and Gatherings

- Engagement participants from previously completed City projects and public-facing City employees indicated that allowing people to perform and use amplification systems in public spaces can lead to a potential source of income. However, some use of amplification systems,

⁴Administration notes that panhandling itself is not proposed to be prohibited, only "aggressive" panhandling.

such as for hate speech or divisive messages, can intrude on personal space, decrease feelings of safety and make people feel targeted. Concerns were noted around this section being challenging to enforce and having a communications plan around the impact on *Charter Rights* activities for public education.

- Public-facing employees noted the usefulness to require permits for groups over 50 from an event management perspective. One comment noted that “for gatherings of more than 50 people - a permit is required to ensure the space is available for use, and to ensure adequate civic services can be provided”. Examples of event management civic services may include road closures and/or traffic management, security personnel and monitoring, or increased waste collection.
- Employees also noted the definition of ‘ambient’ music is vague, and posed questions around the intersection with the *City's Community Standards Bylaw*.
- Public speakers from the February 14, 2024 City Council Public Hearing indicated that the bylaw’s regulations on amplification systems were too strict, hindering community activities and local initiatives. Fear was expressed that amplification restrictions could stifle freedom of expression and promote selective enforcement.
- Public speakers were critical of restrictions on public gatherings as a risk to freedom of speech and expression, hindering spontaneous activism and peaceful assembly. The bylaw’s stance on gatherings and amplification systems was criticized as being out of touch with the current political climate and needs of civic engagement.
- Speakers mentioned these restrictions create barriers to community building and creative use of public spaces, such as playing music at outdoor meetups, or using sidewalk chalk.
- Speakers suggest the bylaw should shift towards stewardship of public spaces rather than over-reliance on enforcement.

Part X - Protection of Public Spaces (Encampments)

- In March 2023, Administration conducted public opinion research to understand Edmontonian’s perception of the City’s role in addressing homelessness. Engagement findings from this research indicate that Edmontonians believe the City should be doing more to address the issue of homelessness.
- Edmontonians who participated in this research prioritized a few areas including transit safety and outreach, affordable housing, year round safe shelter, coordinated response among stakeholders, connecting people in encampments to support, and implementing shelter standards to improve accessibility and appropriateness of emergency shelters.
- Further findings revealed many houseless individuals faced barriers to receiving or maintaining housing due to their physical and mental needs being perceived as “too difficult” or “complicated”, resulting in numerous referrals to various programs and agencies.

- Lack of transitional supports, such as temporary accommodations after incarceration, hospitalization or detox, was also highlighted.
- Engagement research found that lack of safe spaces can increase exposure to violence and exploitation. Not all encampments are desirable or safe for all unhoused or equity-deserving folks, such as youth and women. On the other hand, some perceive shelters to be unsafe, citing gang activity, lack of privacy, unsafe practices, and overpopulation. Some unhoused equity-deserving individuals expressed that they prefer or feel safer staying downtown or in public spaces, rather than remaining in a shelter.
- The research further noted that encampment removal can be demoralizing. If and when encampments are to be removed, research recommends following a compassionate and respectful procedure: provide a reasonable notice/timeline to all occupants; explain why the encampment must be removed; provide sufficient time to pack up belongings and connect them with the appropriate resources and supports, such as transportation.
- Finally, exposure to elements was noted as a risk. Living in tents and temporary structures offers inadequate protection from frostbite, especially during Edmonton's harsh winter conditions. Taking away basic tent shelter without offering an indoor sheltering alternative increases the risk of cold weather related injuries, however, tents alone are also not sufficient to protect the homeless from frostbite, fire, or other weather-related injuries.
- Some public-facing City employees who were engaged wanted clarity on this section of the bylaw, particularly on the definition of the term 'shelters', and the use of pop-up tents and sun shelters in parks, and the use of a tent for the purpose of hosting an event.
- One suggestion was to extend the inclusion of different types of housing that addresses the complex needs of equity-deserving populations; it was noted that there is currently an inadequate supply of non-market housing and the units that are available are ill-equipped for the needs of equity-deserving groups.
- With regard to urination and defecation, some feedback suggested that there is a lack of public washrooms in Edmonton, with no access to private business washrooms. A lack of public washrooms contributes to poor hygiene and sanitation, which can lead to increased health risks and loss of dignity, affecting individuals physical and mental health. Engagees recommended increased availability for facilities, calling for more safe, accessible, 24/7 public washrooms.
- Engaged groups requested the City to adopt supportive policies, such as alternatives to penalties and integrated support services.
- Some public speakers from the February 14, 2024 City Council Public Hearing described the prohibition of temporary shelters and encampments as inhumane, especially in harsh weather conditions; prohibiting temporary shelters and penalizing individuals for using public spaces to stay warm only exacerbates the vulnerability of people experiencing houselessness.

Some speakers disagreed with the prohibition on erecting temporary shelters as it did not consider the circumstances of those without adequate shelter. Some speakers were unhappy with the treatment of houseless individuals during the January 2024 encampments evictions and mentioned that they felt disappointment at the City's lack of compassion and disconnect with its own values. The bylaw was criticized as disrespecting the dignity of those who were recently evicted from encampments in hard times.

- Speakers suggested establishing supports for equity-deserving populations such as public shelters and affordable housing options. Many in the public hearing suggested the City provide alternative shelter/housing options.

Part XIV - Vehicles

- Feedback from public-facing City employees from the Safe Mobility team indicated that crash types that lead to traffic fatalities are driver related, and include drivers not yielding to right of way, following too closely, or running red lights (see Attachment 8); crashes are mostly concentrated in 15 neighbourhoods and disproportionately impact low income households, Indigenous peoples and linguistic minorities.
- The City of Edmonton's Bike Plan notes that many cyclists prefer to share the sidewalk with pedestrians due to high traffic volumes and speeds that would otherwise make biking dangerous.
- E-scooter and e-bike vendors are expanding riding zones in Edmonton to provide more neighbourhoods with access to these shared micromobility devices.
- Many public speakers from the February 14, 2024 City Council Public Hearing expressed concern over the fine penalty associated with biking on sidewalks. They pointed out there is insufficient bike infrastructure throughout Edmonton to reasonably establish this prohibition.
- Some speakers suggest that the current proposed bylaw ignored: the practical realities of cycling and also penalizes individuals for engaging in a sustainable and environmentally friendly mode of transport; concerns by parents around riding safety - with the only safe place to bike in residential areas and other spaces is on sidewalks; officer discretion on fines and ticketing leading to discriminatory enforcement or pretense policing.
- Others speakers recognized the restriction of cycling on sidewalks is not a new bylaw addition, yet to enforce fine penalties is unfair and forces cyclists to travel on busy and potentially unsafe main roads. A suggestion from speakers included a stipulation in the bylaw to allow these activities as long as it does not result in damages to property.

Part XV - Enforcement

- Public-facing City employees recommended that the bylaw consider the possibility of enforcement profiling risks; enforcement practices and approaches have the potential to be inconsistent due to their discretionary nature. Employees recommended compassionate

enforcement practices, including: informing individuals of the rules; what needs to happen next; and letting them know that further violations will lead to 'X' result; for certain violations, instead of administering tickets immediately lead with a verbal warning, written warning, then escalating to a ticket if warnings are ignored.

- Employees noted a disconnect between what enforcement officers feel is happening, what exists in policy and what the public is experiencing.
- Outreach workers expressed working with police is difficult; expressed feeling scrutinized and restricted while working with police.
- Engagement participants suggested that Transit Peace Officers may destroy confiscated drug paraphernalia by stepping on them or shattering the item, such as a glass pipe. On receipt of this feedback, a review into City practices confirmed this is not a permissible Peace Officer practice and in fact would violate policy, best-practices, and create additional hazards.
- Received suggestion is to provide Peace Officers and EPS members with sharps containers to place on their utility belts for better disposal. Security guards should also be equipped with Naloxone⁵.
- Some feedback indicated the presence of enforcement personnel downtown ends up creating a tense and restrictive environment, further exacerbated by the amount of regulations governing downtown Edmonton; suggested 'de-policing' some spaces and replacing them with supports and resources.
- There were concerns raised around the stigma, racism and discrimination from all public-facing service workers, including enforcement officers, towards equity-deserving populations. With regard to the '4E' enforcement approach used by the City, some felt that proposed bylaw policies and punitive measures do not align with this supportive and empathetic approach.
- Some City employees indicate that they feel they are working in silos, particularly disconnected from health care workers and supportive services offered in other organizations. This affects the service they provide by causing inefficiencies, frustration and even traumatizing experiences for clients. Funding structures in particular create competition between service providers, fuelled by competing priorities, such as abstinence from substances versus a harm reduction approach. To combat the silo working structure, recommendations included establish regular meetings, connector hubs, shared databases between service providers and frontline workers, group training, newsletters, establish a standard of best practices and aligned goals across the sector and other systems that allow multiple programs to work together, reduce overlap, and maximize expertise.
- City employees noted that many clients have complex needs that are not being addressed by

⁵ Current City of Edmonton practice requires Peace Officers to have sharps containers located in vehicles; most security guards carry and are trained to use Naloxone, and all Peace Officers and COTT teams carry and are trained to use Naloxone.

the current systems in place, and recommended consideration of a decentralized model, especially for youth. Aggravating factors such as unmanaged physical/mental health and addiction issues can make it difficult to keep clients housed.

- Some public speakers from the February 14, 2024 City Council Public Hearing were critical of fine penalties as being ineffective for deterring undesirable behaviors and being counterproductive for equity-deserving groups who cannot avoid certain behaviors, such as using transit for warmth or visible drug use.
- Speakers expressed concern over enforcement methods of the bylaw, asking for clarity on how the bylaw will be properly and effectively enforced. Speakers questioned the ability of the City to thoroughly follow through on equitable enforcement, and highlighted the need for trauma-informed care and de-escalation training. Speakers noted that enforcement disproportionately impacts Indigenous and racialized populations, as well as people experiencing houselessness and poverty. Speakers suggest focusing on providing supports for equity-deserving populations, rather than penalizing them.

6. FINDINGS AND RECOMMENDATIONS

Limited scope of municipal regulatory authority and budgetary constraints restrict implementation of leading practices through the Public Spaces Bylaw or at the municipal level of government. The City of Edmonton will continue to implement related activities within the Community Safety and Wellbeing Strategy, which includes advocacy to other orders of government.

6a) Finding statement(s):	6b) Leading practice recommendation(s)	6c) Recommendation(s) for Bylaw revisions
<p><i>Part VI - Consumption of Substances:</i></p> <ul style="list-style-type: none"> Individuals who use drugs in public spaces are disproportionately more likely to experience homelessness and live in poverty; therefore, without improved public health infrastructure and supervised consumption sites, a punitive-only approach does not address the underlying challenges faced by individuals who consume drugs in public spaces. 	<p><i>To address the root causes of visible drug use:</i></p> <ul style="list-style-type: none"> Adopt prevention focused and harm reduction strategies, including increasing availability of supervised consumption sites. Use an integrated public health approach, which includes collaboration among enforcement, health and social service providers to respond to substance use. Prevent, reduce and respond to the potential harms of drug consumption in public spaces, while also respecting human rights and promoting health and wellbeing. 	<p><i>In-scope bylaw recommendation:</i></p> <ul style="list-style-type: none"> Limit municipal bylaw regulation of this activity to those spaces where public drug use creates a demonstrable concern for health, safety and well-being of the public. This might include enclosed spaces or places with poor ventilation, public transit, places intended primarily to be used by children, or locations where drug use would hinder the City's ability to maintain a public space in a reasonable state of repair.

6a) Finding statement(s):	6b) Leading practice recommendation(s)	6c) Recommendation(s) for Bylaw revisions
<p><i>Part VII - Fire and Fireworks:</i></p> <ul style="list-style-type: none"> Indigenous Peoples in Edmonton partake in cultural ceremonies involving the use of ceremonial and sacred fires; therefore, limiting fires in public spaces disproportionately impacts the cultural practices of Indigenous Peoples. 	<p><i>To mitigate disproportionate impacts:</i></p> <ul style="list-style-type: none"> Designate certain public spaces, on a temporary or permanent basis, for ceremonial and sacred fires which do not require a permit for Indigenous ceremonies. The City of Edmonton has designated space, and is leading Canada in this respect. Provide permits from EFRS on an as needed basis when communities come forward with a request. 	<p><i>In-scope bylaw recommendation:</i></p> <ul style="list-style-type: none"> Designate certain public spaces, on a temporary or permanent basis, for ceremonial and sacred fires which do not require a permit for Indigenous ceremonies.

6a) Finding statement(s):	6b) Leading practice recommendation(s)	6c) Recommendation(s) for Bylaw revisions
<p><i>Part VIII - Inappropriate Actions and Behaviours:</i></p> <ul style="list-style-type: none"> Those experiencing houselessness often use transit space for activities outside of its intended purpose, such as for shelter, and ETS riders, which are made up of other equity groups, use transit for its intended purpose. Therefore, transit spaces must remain safe, functional, and accessible for their primary purpose while also addressing disproportionate impacts on individuals experiencing houselessness who may be using these spaces as shelter. 	<p><i>To mitigate disproportionate impacts related to use of transit spaces for reasons other than their intended purpose:</i></p> <ul style="list-style-type: none"> Remove or modify the reference to “inappropriate use of transit spaces” throughout the bylaw to using transit space “for reasons other than its intended purpose”. Change indicator of “using transit as intended” from more than one vehicle to the expiry of the proof of payment (POP). Remove sections of the bylaw and the associated fines, as behaviour is still addressed by conditions of POP. If kept, develop enforcement policy directing Peace Officers to not enforce during extreme weather. <p><i>To mitigate disproportionate impacts related to panhandling:</i></p> <ul style="list-style-type: none"> Remove “aggressive manner”, or use of the term “aggressive”; broaden to target threatening and aggressive behaviour rather than a person. Use alternate language to describe aggressive behaviour that is prohibited. Specify: “for the protection and safety of the public and the panhandler”. 	<p><i>In-scope bylaw recommendation:</i></p> <ul style="list-style-type: none"> Implement all recommendations in column 6b.

6a) Finding statement(s):	6b) Leading practice recommendation(s)	6c) Recommendation(s) for Bylaw revisions
<p><i>Part IX - Performances and Gatherings:</i></p> <ul style="list-style-type: none"> The public, and in particular some equity-deserving groups, use public spaces for <i>Charter</i> activities. Overregulation of gathering numbers and prohibiting the use of amplification systems can silence voices of those who participate in these activities. 	<p><i>To mitigate disproportionate impacts related to gatherings:</i></p> <ul style="list-style-type: none"> Add subsection: <i>Charter</i> or 'rights' activities (protests, rallies, and demonstrations) do not require event permits. While these demonstrations are still permitted, they must not be within 'X' metres of an entrance to [insert public spaces], or block access for others to enter or exit [insert public spaces]. Provide advance notice to events being planned if the number is larger than 50 to be able to provide adequate civic services. <p><i>To mitigate disproportionate impacts related to amplification:</i></p> <ul style="list-style-type: none"> Require permit application and approval for use of amplification systems, exceptions for which exist in the Bylaw and to be expanded if required. 	<p><i>In-scope bylaw recommendation:</i></p> <ul style="list-style-type: none"> Implement all recommendations in column 6b.

<p><i>Part X - Protection of Public Spaces:</i></p> <ul style="list-style-type: none"> • Individuals experiencing homelessness disproportionately live in poverty, therefore without alternate housing options and improved public washroom access, a punitive approach does not address the underlying challenges faced by unhoused persons. 	<p><i>To address root causes and mitigate disproportionate impacts of encampments:</i></p> <ul style="list-style-type: none"> • Provide low rent, alternative, affordable housing options or designated encampment zones. • Using an integrated approach, including adapting bylaws to allow limited use of public space - for example, allowing people to stay overnight only. Bylaws can limit outdoor sheltering to specific times and in specific locations. • Improved enforcement protocol: Council should require creation of an SOP for Peace Officers to ensure consistency and transparency. <p><i>To address root causes and mitigate disproportionate impacts of public urination and defecation:</i></p> <ul style="list-style-type: none"> • Implement a strategy on increasing public washroom availability • Keep sections of the Bylaw; reduce fine amounts. • Amendment to the Bylaw and associated Standard Operating Procedure (SOP): no penalties / fines when facilities are not available - adequate alternatives must be available before fines are levied. • Delete section 54 of the draft bylaw 	<p><i>In-scope bylaw recommendation, encampments:</i></p> <ul style="list-style-type: none"> • Refine the definition of “temporary shelters” in section 46 to include for the purpose of sheltering. Bylaw (or associated SOP) should address that encampment removal will not occur when there is inadequate shelter space, and look at different protocols that might apply when the temperature outside is freezing. • Using an integrated approach: Consider whether a limited use of public space (For example allowing people to stay overnight in public spaces only). Bylaws can limit outdoor sheltering to specific times and in specific locations. <p><i>In-scope bylaw recommendation, urination and defecation:</i></p> <ul style="list-style-type: none"> • Keep sections of the Bylaw, reduce fine amounts. • Amendment to the Bylaw/ associated SOP: No penalties/fines when facilities are not available/closed. (Adequate alternative must be available before fines are levied)
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6a) Finding statement(s):	6b) Leading practice recommendation(s)	6c) Recommendation(s) for Bylaw revisions
<p><i>Part XIV - Vehicles:</i></p> <ul style="list-style-type: none"> Houseless individuals disproportionately live in poverty and often use parking spaces to sleep “in the rough”, therefore prohibiting parking overnight will decrease safety for both houseless individuals and the public. Individuals who use active transportation options often ride on sidewalks where active biking infrastructure is lacking, therefore leading to increased safety concerns. 	<p><i>To mitigate disproportionate impacts of parking overnight</i></p> <ul style="list-style-type: none"> Add no parking signs in spaces where overnight parking is not allowed. Provide alternate safe parking zones <p><i>To address root causes and mitigate disproportionate impacts for bicycle, e-bicycle and e-scooters</i></p> <ul style="list-style-type: none"> Improve and expand active transportation infrastructure. Remove prohibition or limit enforcement to only sidewalks that run parallel to bike lanes. 	<p><i>In-scope bylaw recommendation, parking overnight:</i></p> <ul style="list-style-type: none"> Provide alternate safe parking zones <p><i>In-scope bylaw recommendations, bicycle, e-bicycle and e-scooters</i></p> <ul style="list-style-type: none"> Revise the relevant sections of Part XIV to allow bicycles, e-bikes, scooters, inline skates, roller skates, and skateboards in areas where protected active transportation infrastructure does not exist; remove prohibition or limit enforcement to only sidewalks that run parallel to bike lanes. Revise the relevant sections of Part XIV to allow bicycles, e-bicycles, e-scooters, inline skates, roller skates, and skateboards in park spaces provided the use does not cause damage.

6a) Finding statement(s):	6b) Leading practice recommendation(s)	6c) Recommendation(s) for Bylaw revisions
<p><i>Part XV - Enforcement:</i></p> <ul style="list-style-type: none"> Some provisions on enforcement in the Public Spaces Bylaw may have the effect of disproportionately impacting equity-deserving people, such as people experiencing homelessness, who spend much of their time in public spaces; attention should be given to providing support rather than penalizing through substantial fines. 	<ul style="list-style-type: none"> Change all minimum fine amounts to specified fines In cases where the primary enforcement goal is stopping problematic conduct, consider implementing a small or nominal fine. Review SOPs for enforcement and provide updated training to bylaw enforcement teams. 	<p><i>In-scope bylaw recommendation:</i></p> <ul style="list-style-type: none"> Change all minimum fine amounts to specified fines.

7. IMPLEMENTATION

Once approved, Administration will be responsible for the equitable implementation of the bylaw. Enforcement officers (Peace Officers) follow the "4E" model - Engage, Explain, Encourage, and Enforce - which prioritizes education and support over more punitive measures. This means that discretionary enforcement by a Peace Officer may include a range of actions including discussion, education or a warning, a program referral, or in some cases, ticketing. Peace Officers receive ongoing training in cultural competency, implicit bias, and gender sensitivity in order to increase understanding of historical inequities, foster trust with community members, and effectively exercise discretionary enforcement in a way that does not perpetuate further discrimination or marginalization of equity-deserving groups.

8. EVALUATION

Administration will continue to collect bylaw ticketing and warning data to monitor enforcement trends. In addition, the Community Safety and Wellbeing Framework has a robust monitoring and evaluation component, including the Community Safety and Wellbeing Dashboard. Evaluation of the bylaw will be considered as part of the holistic evaluation of the City's efforts to improve community safety and wellbeing.

Updated December 6, 2021

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