

December 22, 2025

Office of Controlled Substances
Health Canada

Opposing Application for a Supervised Consumption Site

This submission is made in response to the application for an exemption under section 56.1 of the *Controlled Drugs and Substances Act* for the establishment of a supervised consumption site in our community.

As of 12-22-2025 there are 611 people who have signed the petition in opposition:
<https://www.ipetitions.com/petition/proposed-consumption-site-at-366-henry-ave>

Our Website lists recent media inquiries, response for opposition <https://northlogan.replit.app/>

1. Demonstration of Need for the Site

Health Canada requires applicants to demonstrate a clear, evidence-based public health need for the proposed site, supported by localized data.

The application fails to establish this requirement. Specifically:

- No verifiable baseline data has been provided regarding:
 - Overdose incidence within the immediate service area
 - Breakdown of overdoses occurring on the street, in residences, or in existing facilities
 - Trends over the preceding 12–24 months
- No comparative analysis is presented demonstrating why this location is necessary relative to other possible interventions or geographic alternatives

Absent localized, time-bound, and disaggregated data, the asserted “need” remains speculative and does not meet Health Canada’s evidentiary threshold.

2. Evidence of Public Health and Public Safety Benefits

Health Canada requires applicants to demonstrate that the proposed site will contribute to improved health outcomes without increasing risks to public safety.

The application does not substantiate this requirement. Specifically:

- There are no defined success indicators or measurable outcomes tied to the proposed site
- There is no explanation of how success will be evaluated, reported, or audited
- There is no commitment to corrective action should outcomes worsen

Without defined performance metrics, the application cannot credibly demonstrate net public health benefit or public safety protection.

3. Community Consultation

Health Canada requires meaningful, inclusive, and well-documented consultation with affected community stakeholders.

The consultation process described in the application is materially deficient:

- Residents, businesses, and community organizations report limited or no opportunity for meaningful engagement
- Feedback mechanisms are unclear, and no documentation demonstrates how concerns were incorporated or addressed
- Consultation appears informational rather than participatory, contrary to Health Canada's stated expectations

As submitted, the application fails to demonstrate good-faith community engagement.

4. Site Location and Proximity Considerations

Health Canada requires applicants to assess site location, including proximity to vulnerable populations and community infrastructure.

The proposed site is in close proximity to:

- Child- and youth-serving organizations
- Community-based prevention and education programs
- Residential and small-business corridors

The application does not adequately assess or mitigate risks associated with this proximity, nor does it explain why alternative locations with fewer conflicts were not selected.

5. Resources, Staffing, and Financial Sustainability

Health Canada requires a clear operational plan, including staffing, governance, and funding.

The application lacks:

- Transparent operating budgets
- Long-term funding commitments
- Clear accountability and oversight mechanisms
- Defined staffing levels and escalation protocols

Without this information, the application does not demonstrate operational sustainability or regulatory reliability.

6. Measures to Minimize Diversion and Address Public Disorder

Health Canada requires enforceable plans to prevent diversion of controlled substances and mitigate community impacts.

The application does not provide sufficient detail regarding:

- Enforcement mechanisms for loitering, public drug use, or paraphernalia disposal
- Coordination with law enforcement, EMS, and municipal services
- Response protocols if disorder or crime indicators increase

Given existing elevated crime trends in the area, this omission is material.

7. Impact on Crime, Safety, and Community Well-Being

Health Canada requires consideration of impacts on crime and community safety.

The application does not adequately address:

- Current crime baselines
- Expected changes to policing, EMS, and emergency department utilization
- Financial and operational burden on municipal services

Without this analysis, Health Canada cannot reasonably conclude that the site will not exacerbate existing conditions.

Conclusion and Request for Determination

For the reasons outlined above, the application does not meet Health Canada's requirements under section 56.1 of the *Controlled Drugs and Substances Act*.

Accordingly, we respectfully request that Health Canada:

1. Decline approval of the application in its current form, or
2. Require the applicant to resubmit with:
 3.
 - Verified baseline data
 - Defined success measures
 - Documented community consultation
 - Transparent financial and operational plans
 - A revised site assessment

This submission is made in good faith and in the interest of public health, public safety, and regulatory accountability.

Respectfully submitted,

North Logan Community Residents, Business & Social Services

C/O Norman J. Alegria, Resident North Logan Community