

Attn:  
City of Courtenay  
830 Cliffe Avenue  
Courtenay, BC V9N 2J7  
6/ 21/2024

Re: Indigenous Women's Sharing Society Comments to Proposed Bylaw #3121

Thank you for the opportunity to provide comments on the proposed bylaw, #3121. In this letter, we will explain some reasoning, our concerns, our recommendation, and comments on the proposed bylaw, and in doing so, explain why the Indigenous Women's Sharing Society (I.W.S.S.) will not support the passing of this bylaw.

We have taken the short amount of time given to us to deliberate on our response. Indigenous Women's Sharing Society, ( I.W.S.S.) actively supports the population that the proposed bylaw affects, and as such, is well-placed to provide unique, grounded, specific insights into how this bylaw's implementation will affect the community. We would welcome additional time to respond, and the opportunity to share these concerns and recommendations in person/in a different format, so that the gravity of our concerns can be heard. We would like to point out that although we appreciate the opportunity to comment at this time, this gesture for consultation was only made after several attempts to implement this bylaw had already occurred. The development of this bylaw and the implementation strategy were created without meaningful Indigenous consultation, and is in opposition to the United Nations Declaration of Human Rights of Indigenous Peoples Act.

As an Indigenous and peer-led organization, we have a deep and complex understanding of the history of racism and colonization of Canada. It is well documented that that colonizing practices and policies continue to oppress Indigenous peoples today in many diverse forms.

Indigenous peoples and organizations including Indigenous Women's Sharing Society are asked to provide consultation, emotional labour, and input on various projects. In situations like this, we are brought into the conversations only after the foundation of the project has been developed and created. This late ask for comments creates an issue where the ask feels forced and needed as a requirement, similar to tokenism. Based on our experience with this engagement, the conversation with I.W.S.S. is late into the process. An invitation to provide input only through comments, is not meaningful Indigenous consultation. First Nations Health Authority, who from our understanding were not consulted or listed. The only health authority consulted was with Island Health. While Island Health is an important collaborator, they do not necessarily represent Indigenous interests and therefore cannot necessarily meaningfully provide input or comments related to Indigenous experiences. As noted above, considering Indigenous experiences in the process of this bylaw development is necessary given that Indigenous people represent a disproportionate percentage of the population that this bylaw could affect, but it is also a legal requirement to consult with Indigenous peoples and organizations where they are affected by government processes.

It is highly concerning that some of the language of this bylaw does not explain how

collaboration with community organizations will be implemented to support individuals impacted by this bylaw. It is also concerning that trauma-informed practices will not be implemented by an additional accompanying support plan developed by the city until 2025. This indicates a lack of knowledge and training on trauma-informed practices on the part of City staff. We would encourage the City staff to complete ongoing, extensive training in trauma-informed care, community collaboration training, training on racism, and including specific training on working effectively with Indigenous peoples. We encourage the staff to review and align the City policies and bylaws with the United Nations Declaration of Human Rights of Indigenous People, which has been legally implemented in Canada since 2021.

Indigenous people represent a small percentage of the population (under 10%) in the Comox Valley, yet Indigenous people represent over 30% of Individuals in the Comox Valley experiencing homelessness. Furthermore, Indigenous youth represent over 50% percent of the children in foster care and are at high risk of experiencing homelessness. The over representation of Indigenous people impacted by these social issues is a direct result of colonization, current oppression, and murder of Indigenous people.

Because of the reasons above and additional reasons we are unable to expand on due to limited time, the Indigenous Women's Sharing Society cannot support the passing of this bylaw. We support actions that do not have the potential to create the possibility of further harm. In its current form, the proposed bylaw has real potential of furthering harm to Indigenous populations. As noted above, Indigenous Women's Sharing Society encourages the City to do the necessary work and ongoing training required to understand why this is the case. Government bodies ( at Federal, Provincial, and Municipal) have had many decades of opportunity to fully support and prioritize the issues of homelessness and homelessness prevention in unharmed ways; unfortunately this has not happened. There is strong evidence that punitive and reactionary authoritative action may briefly temporarily remove the person experiencing homelessness from public view, but perpetrating ongoing displacement of individuals can create further harm and re-traumatization that provides no long-term solution.

If the City is truly interested in a long-term solution aligned with Truth and Reconciliation Commission Calls to Action, trauma informed actions supported by evidence and the Indigenous experiences of those involved should be considered. The principle of 'nothing about us, without us,' is one that I.W.S.S. feels is relevant here: i.e., sustainable solutions (that allow each citizen to maintain their human dignity) to complex social dilemmas must include direct, meaningful, and ongoing consultation and collaboration from those that either have lived experiences in relation to such issues, or from those that can meaningfully and ethically advocate on behalf of those populations.

Upon completion of this letter, we would like to note we were advised during our meeting with the City on our options for commenting. One of the few options provided was that Indigenous Women's Sharing Society could refrain from commenting due to potential optics. This is a confusing and unacceptable statement. We did not choose this option. We are hoping that we now live in a time where Indigenous voices and experiences are valued and upheld, instead of punished, retaliated against, and/or oppressed. This bylaw is directly related to actions on

addressing homelessness. The United Nations Declaration of Human Rights of Indigenous Peoples outlines to pay specific attention to the health, well-being, safety, and dignity of Indigenous peoples in Canada. I.W.S.S. maintains that this issue of homelessness is intersected with many other systemic issues and historical facts that affect Indigenous existence in the Comox Valley. True reconciliation will require a compassionate understanding of such issues, while upholding the human Rights of Indigenous Peoples.

We encourage our City officials to actively address the underlying issues of homelessness, and develop decolonizing practices and policies that provide meaningful actions and interventions. In doing so, these practices and policies will contribute to improving the wellness and health of Indigenous people.

Thank you for your consideration, we look forward to your response and to be considered as meaningful collaborators going forward.

Sincerely,  
Indigenous Women's Sharing Society