



## COUNCIL REPORT

Report Date: June 3, 2025  
Contact: Jody Sydor Jones  
Contact No.: 604.844.1763  
RTS No.: 18017  
VanRIMS No.: 08-2000-20  
Meeting Date: June 17, 2025  
[Submit comments to Council](#)

TO: Vancouver City Council

FROM: General Manager of Arts, Culture and Community Services and General Manager of Development, Buildings and Licensing

SUBJECT: Supervised Indoor Inhalation Spaces

### Recommendations

THAT Council approve, in principle, amendments to the Health By-law that exempt the buildings at 611 Powell Street and 220 Princess Avenue from the non-smoking rules in the Health By-law, and as generally set out in Appendix A;

FURTHER THAT the Director of Legal Services be instructed to bring forward for enactment by Council a By-law to amend the Health By-law, generally as set out in Appendix A, to be effective immediately upon enactment.

### Purpose and Executive Summary

The purpose of this report is to seek Council approval to provide an exemption from section 2.2 of the Health By-law, for: (1) a federally approved supervised consumption site, the Hope to Health Clinic, at 611 Powell St. operated by the BC Centre for Excellence in HIV/AIDS (BC-CfE); and, (2) The Budzey Building at 220 Princess Ave., a site at which Vancouver Coastal Health (VCH) wishes to pilot a supervised indoor inhalation project.

The purpose of the Health By-law exemptions is to enable supervised indoor inhalation spaces at these two sites, to reduce harms and death from drug overdose, specifically associated with highly prevalent inhaled consumption of unregulated toxic drugs.

Federally approved supervised consumption sites have Health Canada exemptions from the Controlled Drugs and Substances Act and can provide services that include supervised inhalation, injection, oral, and intranasal consumption of drugs. Three federally approved sites currently provide services in Vancouver, but none provide indoor inhalation space. The City's regulations on indoor smoking mean that supervised inhalation spaces must be located

outdoors.

Locations available in Vancouver for supervised outdoor inhalation are limited and, in 2023, the BC-CfE was granted permits from the City authorizing them to construct six indoor inhalation booths at the Hope to Health Clinic. At that time, staff recommended a non-enforcement resolution on the ban on indoor smoking at supervised consumption sites that have Health Canada approval, such that the full range of services allowed by Health Canada could be provided, i.e., supervised inhalation in addition to supervised injection, intranasal and oral ingestion, and drug checking. This non-enforcement of the Health By-law was applicable to the BC-CfE site and was intended to enable supervised indoor inhalation pending Health Canada approval. However, Health Canada subsequently determined that the Health By-law non-enforcement resolution was insufficient to grant approval for indoor inhalation. Health Canada has more recently provided clarity that confirmation of compliance with municipal by-laws is required to enable them to grant approval of applications to operate indoor inhalation spaces, such as the application from the BC-CfE.

If approved by Council, the Health by-law amendment would enable the BC-CfE to demonstrate compliance with municipal by-laws in their application to Health Canada for approval to operate indoor inhalation spaces at the Hope to Health clinic at 611 Powell St. The amendment would also enable VCH to pilot a supervised indoor inhalation booth at the Budzey Building at 220 Princess. Vancouver Coastal Health, operating under Ministerial Order 488/2016,<sup>1</sup> does not require federal exemption to support supervised indoor inhalation services but does need exemption from municipal by-laws for this purpose.

### **Council Authority/Previous Decisions**

- In May 2023, Council adopted a resolution to suspend enforcement of the requirements in Section 2 of the Health By-law that prohibit indoor smoking at supervised consumption sites that have Health Canada approval for indoor inhalation services and meet applicable WorkSafe BC requirements.
- In July 2019, Council approved the safe supply statement created in collaboration with the Vancouver Community Action Team, advocating for the provision of Safe Supply to prevent further harm from drug-poisoning.
- In December 2018, Council approved over 30 recommendations in the Mayor's Overdose Emergency Task Force Report, including immediate actions in the areas of Indigenous healing and wellness, peer networks, promoting safety for those who use alone at home, harm reduction, safe supply, treatment, low barrier employment, and collective action for change.

### **City Manager's Comments**

The City Manager concurs with the foregoing recommendations.

---

<sup>1</sup> Province of British Columbia, [Ministerial Order No. 488 \(2016\)](#), Emergency Health Services Act.

## Context and Background

Vancouver and British Columbia continue to experience an on-going opioid overdose crisis. In April 2025 the BC Coroners Service reported that at least 16,000 people have died from toxic drug supply in the Province since a Public Health Emergency was declared in April 2016.

To date, approximately 4,000 of the province-wide deaths since the declaration have occurred in Vancouver, and reports show an ongoing worsening of harms caused by drug poisoning.

Modes of drug use have been changing; compared to previous years, smoking has increased and drug injection has decreased. Among persons who died from overdose between 2017 and 2025 in BC, smoking was the most common mode of consumption of unregulated toxic drugs. Since the beginning of 2025, 62% of unregulated toxic drug deaths in BC are attributed to smoking as the primary mode of consumption.<sup>2</sup> At the same time, there is limited scope of available supervised consumption options, in particular for those whose preferred mode of consumption is inhalation.<sup>3</sup>

### Supervised Consumption Services

Supervised consumption services (SCS) reduce harms and death from drug overdose.<sup>4</sup> Health Canada approves SCS that include supervised inhalation, injection, oral and intranasal consumption; peer assistance; and drug checking, among other services. Federally approved SCS are subject to an exemption from the Controlled Drugs and Substances Act (the “Act”). The Act would otherwise prohibit possession of controlled substances. In Vancouver, three federally approved sites currently offer these services; two are open to the public (Hope to Health, and InSite). The third, located in the Dr. Peter Centre, is only open to clients of that site. None of the SCS in Vancouver currently provide supervised inhalation services.

Supervised consumption sites are distinct from urgent public health need sites, commonly known as overdose prevention sites. Overdose prevention services and sites are approved by the Province and operated by local health authorities as authorized through Ministerial Order 488/2016. In Vancouver, there are seven operating overdose prevention sites. Five of these sites offer outdoor supervised inhalation services; none offer indoor inhalation. Vancouver Coastal Health maintains a list of all public SCS and overdose prevention sites in Vancouver.<sup>5</sup>

### Hope to Health Clinic, at 611 Powell St., operated BC-CfE

The Hope to Health Clinic, operated by the BC-CfE, is one of Vancouver’s three federally approved supervised consumption service providers. The BC-CfE has been providing HIV/AIDS prevention, treatment and care, and research at 611 Powell Street for over ten years, overseen by the St. Paul’s Foundation. In 2019, BC-CfE opened Hope for Health as an interdisciplinary primary care health service for people residing in the Downtown Eastside, in response to the lack of primary care services in the neighborhood. In 2020 it established a supervised consumption site with booths for supervised injection, and in 2022 the clinic began offering

---

<sup>2</sup> BC Coroners Service Information Bulletin, [2025 Summary – Toxic Drug Deaths](#)

<sup>3</sup> BC Coroners Service Death Review Panel, [An Urgent Response to a Continuing Crisis 11.1.2023](#)

<sup>4</sup> Health Canada, [Supervised Consumption Sites Explained](#)

<sup>5</sup> Vancouver Coastal Health, [Supervised Consumption, Overdose Prevention, and Drug Testing Sites](#) (May 2025).

Injectable Opioid Agonist Therapy (iOAT) to patients. The BC-CfE has no suitable outdoor space for inhalation at 611 Powell. In 2023, the BC-CfE received permit approvals from the City authorizing the construction of six indoor inhalation booths. In its application to the City, BC-CfE cited evidence from the BC Coroners Service 2022 report that inhalation and smoking of illicit drugs are now responsible for more overdose deaths than drug injection. This aligned with community feedback regarding the need for inhalation-inclusive safe supply and supervised consumption services.

Health Canada requires compliance with municipal by-laws to enable them to grant approval of applications to operate indoor inhalation spaces, such as the application from the BC-CfE. Because the Health By-law prohibits indoor smoking in any building that is open to the public, in 2023 staff requested Council approval of a resolution that authorized localized non-enforcement of the Health By-law for a two-year period, during which the BC-CfE would obtain Health Canada approval for the supervised indoor inhalation service. Although the resolution was approved in May 2023, Health Canada later indicated that the BC-CfE's application to operate supervised inhalation based on non-enforcement of the Health By-law was insufficient to provide approval of the application.

## Discussion

From a broad public health perspective, outdoor supervised inhalation sites are the preferred option and are the most economical to establish. However, the number of appropriate, available outdoor locations is limited, and public health colleagues agree that indoor supervised inhalation may be appropriate in certain circumstances, including for the BC-CfE Hope to Health location and the VCH pilot at The Budzey Building.

### Hope to Health Clinic, at 611 Powell St., operated BC-CfE

Over the past year, staff have been in discussion with Health Canada regarding the BC-CfE application. Staff have confirmed that a site-specific Health By-law exemption to permit indoor inhalation would be required for Health Canada to provide approval to the BC-CfE's application for operation of the supervised inhalation booths that are now established at the Hope to Health clinic.

### The Budzey Building at 220 Princess Ave., VCH inhalation booth

VCH is seeking to establish a pilot for supervised indoor inhalation at The Budzey Building, 220 Princess Avenue. This 6-12 month pilot intends to determine the efficacy of inhalation booths that would support supervised indoor inhalation to reduce the risk of toxic drug events and also decrease occupational health and safety exposures to smoke from indoor consumption of unregulated substances, for substance users and employees working at housing sites and potentially other sites in future (Appendix B).

The indoor inhalation proposed at 220 Princess Ave. will not be an overdose prevention site, as it will not offer the full suite of services most overdose prevention sites offer and will not be open to the public. This location will only offer supervised indoor inhalation in a purpose-built inhalation booth for residents of the building. VCH is therefore also seeking a site-specific Health By-law exemption to pilot a new mode of indoor inhalation, utilizing purpose-built technology.

In summary, staff are recommending the site-specific exemption from the requirements of section 2 of the Health By-law for the BC-CfE Hope to Health clinic, and the pilot supervised indoor inhalation project led by VCH at The Budzey Building, as they will make an important contribution to life-saving efforts in Vancouver. If approved, this amendment would contribute to the BC-CfE's and VCH's comprehensive harm reduction activities at these sites.

VCH supports both these proposed Health By-law exemptions and both of these sites will need to be WorkSafe BC compliant to operate.

### **Financial Implications**

There are no financial implications.

### **Legal Implications**

If the Recommendations in the report are approved, Council will amend the Health By-law to exempt two treatment sites from the Health By-law's no smoking rules.

\* \* \* \* \*

## APPENDIX A

**BY-LAW NO.**

**A By-law to amend Health By-law No. 9535  
regarding exemptions from smoking regulations**

THE COUNCIL OF THE CITY OF VANCOUVER, in public meeting, enacts as follows:

1. This By-law amends the indicated provisions of the Health By-law No. 9535.
2. Council strikes “in a building, except in:” from section 2.2(a) and replaces it with:  
“in a building, other than an exempt building listed in Schedule C, except in:”.
3. Council adds a new Schedule C to this By-law, as attached as Schedule C.
4. A decision by a court that any part of this By-law is illegal, void, or unenforceable severs that part from this By-law, and is not to affect the balance of this By-law.
5. This By-law is to come into force and take effect upon enactment.

ENACTED by Council this                      day of                      , 2025

Mayor

City Clerk

## **Schedule C**

### **Buildings exempt from section 2.2 of this By-law**

#### **Address:**

611 Powell St., Vancouver, BC

220 Princess Ave., Vancouver, BC

## Appendix B

### VCH Indoor Inhalation Pilot Project (Additional Information)



Vancouver Coastal Health  
#721 – 601 W Broadway  
Vancouver, BC V5Z 4C2

#### InhalAire® Safety Booth Pilot

Date: May 12, 2025

Additional attachment: InhalAire® Booth

Prepared by:

Elizabeth Holliday, Director, Substance Use & Harm Reduction

Mark Lysyshyn, Deputy Chief Medical Health Officer

#### Background & Purpose

Vancouver Coastal Health is in support of the City of Vancouver proposal to provide site-based exemptions to the City of Vancouver smoking bylaw at specified addresses to allow for implementation of indoor supervised inhalation services within pre-specified locations in Vancouver. These exemptions would provide clear direction for Hope to Health to implement supervised inhalation services in their supervised consumption site, and for the Budzey InhalAire® Safety Booth Pilot which will also offer supervised inhalation services to residents of the Budzey Building. These types of overdose prevention services are supported by Ministerial Order 488/2016, which recognizes the importance of supporting people who use substances in a safer environment in the context of the public health emergency due to drug toxicity.

The Budzey site is being put forward as a pilot for an InhalAire® Safety Booth, to support Budzey residents' access to safer indoor inhalation technology. Based on the results of the pilot, this device could be a feasible option to use in other sites such as housing, hospitals or clinics. This is an opportunity to meaningfully contribute to the response to the toxic drug emergency, with additional co-benefits such as decreasing occupational health and safety exposures to smoke from indoor consumption of unregulated substances.

#### Pilot at the Budzey

The Budzey funded by BC Housing and operated by RainCity Housing provides supportive housing and programming for women (Trans, Cis, Two-spirit, and Gender Diverse) and women-led families. This site has been selected as the value of an indoor supervised inhalation solution at the largest women's building in Vancouver is a key strategy in mitigating gender-based violence for indigenous and non-indigenous women in the community, while also building community safety and peer connection.

#### RainCity Operations

- This device will only be available to residents of the Budzey.
- Monitoring for InhalAire® Safety Booth will be staffed by peer workers with lived experience and will be open 7 days a week from 5:00pm-11:00pm. The peer workers are people with lived experience and very familiar with overdose response and the tenant population at the Budzey.







Vancouver Coastal Health  
#721 – 601 W Broadway  
Vancouver, BC V5Z 4C2

- In addition, 5 evenings a week there will be a unionized staff member known as a peer support specialist who will be available to offer additional support to the peer.

#### VCH Support

- VCH has an existing contract with the Budzey to provide housing-based overdose prevention services, this pilot would be captured in this scope of work including funding for peer workers.
- Authorization to conduct the pilot via Ministerial Order 488/2016.
- Overdose prevention and harm reduction training and support.
- Monitoring and evaluation support to ensure device is operating as intended.

#### Description of InhalAire Booth

The InhalAire® Safety Booth provided by Fair Price Pharma has been specifically designed for use by clients who are inhaling unregulated substances or prescribed inhaled medications to ensure the safety of clients, staff and the environment. The booth is not to be used for vaping, smoking tobacco or cannabis. This device extracts and filters air through an integrated motorized HEPA Filter/Extractor installed in the ceiling and is then vented outside directly or through the building's ventilation system. Additionally, the "Turbo Exhaust" feature ensures an automatic complete exchange of all air in the booth prior to the door opening to eliminate room contamination when the door is opened.

#### Specifications

- Similar in size to a telephone booth and designed to fit in most indoor spaces.
- It requires a simple 120v wall socket and a nearby window for an external duct.
- Windows in the side and door allow visualization of clients.
- Interior and exterior emergency buttons allow for immediate entry and exit.

#### Installation & Maintenance

- The prototype is being provided at no cost including installation and certification, any maintenance or re-certification costs during the first year of operation.
- The device will be installed in the existing safer use room which has been measured and assessed.
- Initial consultation about installment and site-specific testing and certification will be performed by licensed technicians, with certification decal and report provided prior to any use.
- Routine re-certification will depend on use.
- Staff and clients, as selected by Budzey management, will receive complete on-site training on booth operation and safety.
- A comprehensive Operating Manual will always be available on site.

