



Public Safety Legislation

WHAT WE HEARD

Lois sur la sécurité publique

CE QUE NOUS AVONS ENTENDU

Le présent document contient la traduction française du sommaire.



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Executive Summary

Communities across the Northwest Territories are dealing with serious problems from drug crime and illegal activities that affect how safe people feel in their neighbourhoods. Residents are worried about the level of illicit drug use, drug trafficking, bootlegging, and violent offences occurring in the Northwest Territories (NWT). These concerns have intensified in recent years, with Indigenous Governments, community leaders, municipal councils, and residents consistently raising community safety as a priority requiring immediate action from the Government of the Northwest Territories (GNWT).

In response to these concerns, the 20th Legislative Assembly made the safety of residents and communities a mandate priority, with a specific commitment to develop public safety legislation. The GNWT is responding to residents' concerns about drug-related crime and illegal activity in communities and tasked the Department of Justice to develop three new laws:

- Trespass to Property;
- Civil Forfeiture; and
- Safer Communities and Neighbourhoods (SCAN).

Public safety legislation represents one set of legislative tools to improve community safety. These laws would give the territorial government new ways to disrupt certain crimes linked to property and to take away money and items gained through crime. They are not meant to provide social programs or directly address health issues, the root causes of crime, or the rehabilitation of people involved in illegal activities.

The GNWT conducted a public engagement on Civil Forfeiture and SCAN legislation from October 27 to November 28, 2025. The purpose of the engagement was to gather feedback on the proposed approaches for Civil Forfeiture and SCAN, to understand community concerns about potential impacts, and to identify the safeguards and design features that matter most to residents. Feedback on the proposed trespass legislation was gathered through a separate engagement and is summarized in another report.

This report summarizes feedback gathered through in-person and virtual meetings, online surveys, and written submissions about the GNWT's approach to Civil Forfeiture and SCAN legislation. The GNWT also invited feedback from Indigenous Governments, partners, stakeholders and community organizations. Respondents were given the option to provide their responses by mail and email, in addition to completing the survey online.

The public engagement revealed that Civil Forfeiture had broad support, with many participants strongly agreeing that taking profits away from crime is the right approach. While participants raised concerns, especially about due process, impacts on vulnerable people, and the need for transparency, these were generally seen as implementation issues rather than outright opposition. Written submissions from Indigenous Governments and business organizations showed strong support, and most survey respondents believed that removing profits and tools of crime would help deter criminal activity. Support was conditional on having strong safeguards in place, easy access to legal protections, and clear, transparent rules for how forfeited funds would be used and redistributed to fund community initiatives.

Feedback on SCAN legislation showed support for having tools to deal with problem properties, along with concerns about whether the law could do more harm than good. Participants expressed frustration with known drug houses operating openly in their communities and supported stronger enforcement options. At the same time, many questioned whether SCAN would truly address organized criminal activity or mostly affect vulnerable residents whose properties are exploited, while serious traffickers simply move elsewhere. Written submissions showed strong polarization. Social service organizations and housing advocates strongly opposed SCAN, while some Indigenous Governments and business groups expressed strong support. Survey respondents were evenly split on whether SCAN would be effective, even though most agreed that problem properties are a serious concern.

This report summarizes the feedback received through the engagement process, providing an account of what NWT residents, Indigenous Governments, stakeholders, and community organizations said about the proposed legislation and how their input will inform the path forward. The full report, including key themes, survey results, and areas that need more clarity, will help shape and improve the proposed Civil Forfeiture and SCAN legislation to address public concerns while staying focused on community safety.



Sommaire

Partout aux Territoires du Nord-Ouest, les collectivités font face à de graves problèmes de drogue, de criminalité et d'activités illégales qui compromettent le sentiment de sécurité des résidents. En effet, ces derniers s'inquiètent du niveau de consommation et de trafic de drogues illicites ainsi que de la contrebande d'alcool et des infractions violentes aux Territoires du Nord-Ouest (TNO). Ces préoccupations se sont accentuées au cours des dernières années, et les gouvernements autochtones, les dirigeants communautaires, les conseils municipaux et les résidents désignent régulièrement la sécurité communautaire comme une priorité nécessitant des mesures immédiates de la part du gouvernement des Territoires du Nord-Ouest (GTNO).

En réponse aux préoccupations des résidents concernant la drogue, la criminalité et les activités illégales dans les collectivités, la 20^e Assemblée législative a fait de la sécurité des résidents et des collectivités une priorité de son mandat, notamment en s'engageant à élaborer des lois sur la sécurité publique. C'est pourquoi il a chargé le ministère de la Justice d'élaborer trois nouvelles lois :

- Loi sur l'entrée sans autorisation
- Loi sur la confiscation civile
- Loi visant à accroître la sécurité des collectivités et des quartiers (SCAN)

Les lois sur la sécurité publique constituent un ensemble d'outils législatifs visant à améliorer la sécurité communautaire. Ces lois donneraient au gouvernement territorial de nouveaux moyens de lutter contre certaines activités criminelles liées aux biens et de saisir l'argent et les biens obtenus par des activités criminelles. Elles ne visent pas à mettre en place des programmes sociaux ni à s'attaquer directement aux enjeux de santé, aux causes profondes de la criminalité ou à la réadaptation des personnes impliquées dans des activités illégales.

Le GTNO a mené des échanges avec le public sur les projets de loi sur la confiscation civile et la sécurité des collectivités et des quartiers du 27 octobre au 28 novembre 2025 pour recueillir des commentaires sur les approches proposées concernant la confiscation civile et la sécurité des collectivités et des quartiers; mieux comprendre les préoccupations des collectivités quant aux répercussions possibles, et déterminer les mesures de protection et les éléments de conception jugés les plus importants par les résidents. Les commentaires sur le projet de loi sur l'entrée sans autorisation ont été recueillis dans le cadre d'une consultation distincte et sont résumés dans un autre rapport.

Dans le présent rapport, vous trouverez un résumé des commentaires recueillis grâce à des rencontres en personne et virtuelles, des sondages en ligne et des observations écrites concernant l'approche du GTNO dans l'élaboration de la loi sur la confiscation civile ainsi que la loi visant à accroître la sécurité des collectivités et des quartiers. Le GTNO a également invité les gouvernements autochtones, les partenaires, les intervenants et les organismes communautaires à formuler des commentaires. Les répondants avaient la possibilité de fournir leurs réponses par courrier ou par courriel, en plus de remplir le sondage en ligne.

Les échanges avec le public ont révélé un vaste appui à la confiscation civile. De nombreux participants étaient fortement en accord avec l'idée que retirer les profits issus d'activités criminelles constitue la bonne approche. Bien que certaines préoccupations aient été soulevées, notamment en ce qui concerne le respect de la procédure régulière, les répercussions sur les personnes vulnérables et la transparence, on estime qu'il s'agit ici plutôt d'enjeux liés à la mise en œuvre qu'une opposition au principe même de la mesure. Les observations écrites soumises par les gouvernements autochtones et les organismes du milieu des affaires démontraient également un solide appui au projet de loi. La majorité des répondants au sondage estiment que la confiscation des profits et des instruments du crime contribuerait à dissuader les activités criminelles. Cet appui demeurerait toutefois conditionnel à la mise en place de solides mesures de protection, à un accès facile à une protection juridique ainsi qu'à l'adoption de règles claires et transparentes concernant l'utilisation et la redistribution des fonds confisqués afin de financer des initiatives communautaires.

Les commentaires sur le projet de loi visant à accroître la sécurité des collectivités et des quartiers ont démontré un appui à l'idée de disposer d'outils pour intervenir dans les propriétés problématiques, tout en soulevant des préoccupations que la loi est susceptible de causer davantage de tort que de bien. Les participants ont exprimé leur frustration face aux trafiquants de drogues connues qui opèrent ouvertement dans leurs collectivités et ont appuyé le recours à des mesures plus musclées. En même temps, plusieurs se demandaient si la loi SCAN permettrait réellement de lutter contre le crime organisé ou si elle toucherait surtout les résidents vulnérables dont les propriétés sont exploitées, pendant que les trafiquants les plus importants se déplaceraient simplement ailleurs. Dans les observations écrites, on a constaté une forte polarisation des points de vue. Les organismes de services sociaux et les défenseurs du logement se sont fortement opposés à la loi SCAN, tandis que certains gouvernements autochtones et groupes du milieu des affaires l'ont fortement appuyée. Les répondants au sondage étaient divisés quant à l'efficacité potentielle de la loi SCAN, même si la majorité reconnaissait que les propriétés problématiques sont, en effet, une préoccupation importante.

Dans le présent rapport, vous trouverez un résumé des commentaires recueillis lors des échanges avec le public. Vous y trouverez également les commentaires exprimés par les résidents des TNO, les gouvernements autochtones, les intervenants et les organismes communautaires au sujet des projets de loi proposés ainsi que la manière dont ces commentaires contribueront à orienter la suite des travaux. Le rapport intégral, y compris les principaux thèmes, les résultats des sondages et les aspects nécessitant davantage de précisions, contribuera à l'élaboration et à l'amélioration des projets de loi sur la confiscation civile et la sécurité des collectivités et des quartiers pour répondre aux préoccupations du public sans perdre de vue la sécurité communautaire.



Establishing the Project

The Department of Justice was tasked with leading the development of legislative proposals for Safer Communities and Neighbourhoods (SCAN) and Civil Forfeiture and supporting the associated legislative process. The scope included establishing a project team, conducting research into similar work in other jurisdictions, undertaking public engagement and consultation, and developing draft legislative proposals.

The GNWT recognized these laws would have significant impacts on communities, people involved in illegal activities, innocent people living in or near problem properties, landlords, and the territory as a whole.

The Department invited feedback from a wide range of stakeholders and partners, such as professional organizations, victim services and community justice groups, the RCMP, the judiciary, GNWT agencies and departments, chambers of commerce, disability groups, the NWT Seniors' Society, and more.

In addition, the Department invited feedback from all Indigenous Governments in the Northwest Territories (NWT) and engaged with any who had feedback or concerns.

We asked the public and interested groups to help answer the following questions:

- Do residents believe these legislative tools will improve community safety?
- What concerns do people have about potential negative impacts, particularly on vulnerable persons?
- How can the legislation be designed to maximize benefits and minimize harm?
- What safeguards and protections are most important to residents?
- How should forfeited funds be used to benefit communities?
- What illegal activities should be priorities for SCAN?
- What role should Indigenous Governments and communities play in implementation?

Engagement Overview

The public engagement was conducted through multiple channels to provide opportunities for participation from across the territory:

- **In-Person Community Meetings:** In-person engagement meetings were held in Fort Smith (October 27), Hay River (October 28), Norman Wells (November 17), Yellowknife (November 18), and Inuvik (November 19). These sessions provided residents with opportunities to ask questions, discuss concerns, and share feedback directly with GNWT officials. Additionally, the Minister of Justice visited Łutselk'e

with the Assistant Deputy Minister, Attorney General and provided a presentation on both pieces of legislation, receiving feedback from community members.

- **Virtual Meetings:** Two virtual engagement sessions were offered, one in English (November 25) and one in French (November 26), to reach residents unable to attend in-person sessions or who preferred remote participation.
- **Online Surveys:** Separate online surveys were developed for Civil Forfeiture and SCAN legislation, each containing 13 questions designed to gather both quantitative and qualitative feedback, from October 27 - November 28, 2025. The surveys included closed-ended questions with predetermined response options and open-ended questions allowing detailed comments. Both surveys collected demographic information and asked about participants' connection to their community.
- **Written Submissions:** The GNWT accepted written submissions throughout the engagement period from individuals, organizations, and Indigenous Governments, providing opportunities for detailed feedback and analysis.
- **Stakeholder and Indigenous Governments Engagement:** The Department of Justice invited feedback from all Indigenous Governments in the North and engaged directly with those who provided input. The Minister of Justice visited the community of Łutselk'e with the Assistant Deputy Minister, Attorney General and provided a presentation and received feedback on both proposed laws. Direct outreach was also conducted to professional organizations, victim services and community justice groups, the RCMP, the judiciary, GNWT agencies, Chambers of Commerce, disability advocacy groups, the NWT Seniors' Society, housing and social service providers, and legal service organizations.

Feedback was received from residents and organizations across the North. This GNWT's public engagement for Civil Forfeiture and SCAN was designed to capture diverse perspectives from across the territory's varied contexts, like community sizes and geographic regions. More detail on the engagement approach is found in Appendix A.

Overview of Proposed Legislation

Civil Forfeiture and SCAN give the territorial government new ways to intervene and disrupt crimes linked to property. They are not meant to provide new social programs or directly address health issues, the root causes of crime, or rehabilitation for people involved in illegal activities. The following section provides an overview of each of the proposed new laws.

Civil Forfeiture Legislation

Civil Forfeiture is a civil law tool that allows the government to take ("forfeit") property that was gained from, or used to commit unlawful activity, through a court or an administrative forfeiture process. The legislation provides for civil forfeiture proceedings to target the property itself, such as personal property like cash, vehicles, or other valuables and real property like land or buildings, including homes. Civil forfeiture operates separately from criminal prosecutions against individuals which is the responsibility of the federal government in the NWT. Civil forfeiture proceedings are brought against the property connected to unlawful activity pursuant to the GNWT's authority to legislative property and civil rights in the NWT.

The legislation is designed to recover property that is:

1. Proceeds of unlawful activity: Money or property gained from crime, such as cash from drug sales, and;
2. Instruments of unlawful activity: Property used to commit crime, such as vehicles used to transport illegal drugs.

The GNWT provides the property owner or anyone with an interest in the property notice of proceeding to have the opportunity to dispute civil forfeiture. If the person disputes civil forfeiture, the proceeding will end up in court where a judge will order forfeiture if the property is proceeds or an instrument of unlawful activity unless it is clearly not in the interests of justice to make the order. The judge can also order for property to be:

- Returned to a person who has proven they were not involved in the crime or didn't know their property was gained from or used to commit a crime;
- Returned to the victim of the crime; and
- Sold, with the proceeds of sale being used to compensate victims of crime or creditors.

If the property is forfeited to the GNWT, forfeited money or money generated through the sale of forfeited property can be used to support services that benefit victims, to compensate victims, or to support community programs and crime prevention initiatives. GNWT can also recover costs and expenses related to the proceeding or costs related to managing and selling the property.

The legislation will include measures to promote a transparent civil forfeiture program through annual reporting on the civil forfeiture program's activities, including the number of forfeitures, the value of those forfeitures and how the money from forfeitures was used.

SCAN Legislation

SCAN legislation is designed to address problem properties where illegal activities habitually occur and threaten community safety. Unlike criminal enforcement that targets individuals through police investigation and prosecution, SCAN provides civil mechanisms focused on the property itself where illegal activity is occurring. The NWT's proposed approach differs from SCAN legislation in other Canadian provinces and territories by focussing on rental properties and using the existing Rental Office dispute resolution system rather than creating new court-based processes.

SCAN allows residents to confidentially report problem properties to SCAN officers, who would investigate complaints and work to stop illegal activities, first through informal resolution where possible (discussions with property owners and tenants, warning letters, referrals to support services), and if illegal activity continues, by supporting landlords in applying to the Rental Office for eviction orders or by applying directly to the Rental Office when landlords are unable or unwilling to act. SCAN officers would have authority to initiate investigations on their own, for example, when known illegal activity moves from one property to another. The independent Rental Officer would make decisions on eviction applications, with orders having the same force as court orders. The SCAN officers would coordinate with social services when orders affect vulnerable persons, conduct civil investigations separate from RCMP criminal investigations, and have mechanisms to share information with RCMP where necessary. SCAN legislation would require annual reporting on complaints and outcomes.



What We Heard

Participants of the in-person sessions, the online surveys, and other meetings and engagement methods used were invited to comment on specific questions related to the proposed legislation. Engagement participants also provided their thoughts on challenges related to the current state of public safety in the NWT and their views on how to best plan to implement the new legislation.

All this feedback was analyzed and grouped into common themes, grouped as follows:

<h3>Civil Forfeiture</h3> <p>Feedback on Civil Forfeiture proposed legislation and related questions. This has been grouped into:</p> <ul style="list-style-type: none">• Themes;• Online Survey Statistics;• Key Takeaways; and• Implementation Considerations.	<h3>Safer Communities and Neighbourhoods (SCAN)</h3> <p>Feedback on SCAN proposed legislation and related questions. This has been grouped into:</p> <ul style="list-style-type: none">• Themes;• Online Survey Statistics;• Key Takeaways; and• Implementation Considerations	<h3>Other Public Safety Challenges</h3> <p>Feedback on challenges in areas related to public safety in each community.</p>
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Civil Forfeiture

Theme 1: Support for Removing the Profit from Crime

Participants from all engagement activities generally supported the main goal of Civil Forfeiture of taking away the money and assets that help support criminal activity. Many people shared examples of seeing signs

of illegal profits in their communities and agreed that there should be consequences in place to stop individuals from benefiting financially from crime.

- **Visible Signs of Illicit Profit:** Participants described observing individuals in their communities with expensive vehicles, recreational equipment, and other assets despite having no apparent legitimate source of income. Residents indicated these observations were visible signs of proceeds from drug trafficking and other illegal activities in their communities. The pattern created frustration among community members who viewed it as demonstrating that criminal activity generates financial benefits without meaningful consequences.
- **Tangible Consequences:** Participants supported measures that create real consequences for those involved in criminal activity and prevent them from continuing to profit from illegal conduct. The support emphasized both individual accountability for criminal choices and frustration with what participants perceived as normalization of drug trafficking in communities.

Theme 2: Effectiveness

Participants expressed mixed views on whether Civil Forfeiture would reduce criminal activity and whether sufficient capacity exists to implement the legislation effectively. While some believed removing assets would disrupt operations and create consequences, others questioned whether the tool would meaningfully deter individuals involved in drug trafficking, particularly those coming from outside the NWT.

- **Deterrence:** Views on deterrence varied significantly across participants. Those who believed in deterrent effects emphasized that seizing proceeds would disrupt operations and create tangible consequences that would discourage continued involvement in illegal activity. However, others questioned whether people involved in drug trafficking would change their behavior because of asset forfeiture, especially people affected by addiction or poverty, or those working in larger criminal networks. The concern was whether the threat of losing money or property would be enough to stop criminal activity, especially when people may not expect to be caught or may not own much property in the NWT.
- **Out-of-Territory Criminals:** A recurring observation made was that many drug dealers operating in NWT communities are not residents and do not own property in the territory. Instead, participants described patterns where out-of-territory dealers exploit locals by using their homes and vehicles as bases for drug operations.
- **Retaliation and Safety:** Participants raised concerns about potential retaliation against those who report illegal activities, reflecting the reality that, in small communities, providing information about criminal activity can expose individuals and their families to threats or violence.

Theme 3: Use and Distribution of Forfeited Funds

Participants across all communities expressed support for using forfeited funds to benefit communities, particularly for programs supporting victims, youth, and addiction treatment. Residents were concerned that the funds wouldn't be distributed equitably across the regions, with participants requesting transparency about how funds would be allocated across communities.

- **Community Investment:** Participants emphasized that forfeited funds should be reinvested directly into communities rather than absorbed into general government revenues. People wanted to see clear benefits from enforcement and are concerned that, without specific rules, seized money would disappear into the government with no direct benefit to communities affected by crime.

- **Regional Fairness Concerns:** Participants raised concerns about whether fund distribution would replicate existing patterns where resources and benefits flow disproportionately to larger regional centres, while smaller communities receive limited benefits. People emphasized that communities affected by drug trafficking should see direct benefits from forfeited money.
- **Transparency and Accountability:** Participants requested transparency about how much money is forfeited and how it is distributed. The emphasis on transparency reflected both a desire for public accountability and concern that without explicit reporting requirements, communities would have no way to verify that forfeited funds are being used as intended.

Theme 4: Concerns About Vulnerable Persons and Unintended Impacts

Participants raised concerns about how civil forfeiture would affect vulnerable people, particularly children, elders, and individuals struggling with addictions. Questions focused on what would happen to dependents when property or assets were forfeited, whether individuals with addictions would be further marginalized, and how low-income or subsidized housing situations would be handled.

- **Children and Dependents:** Participants were concerned about the impacts on children, Elders, and other dependents who live in homes that could be seized or who rely on people whose assets may be taken. They noted the challenge of holding people accountable for criminal activity while also protecting innocent household members who may have little control over the actions of others in their home.
- **Support Services:** Participants emphasized that enforcement measures alone would not address the underlying conditions that enable criminal activity or support those affected by it. Many stressed that Civil Forfeiture should be implemented alongside investments in addiction treatment, housing supports, mental health services, and poverty reduction rather than as a standalone enforcement tool.

Theme 5: Legal Process and Due Process Protections

Participants raised questions and concerns about due process, burden of proof, and protections for innocent property owners. Questions focused on legal timelines, what happens to property during proceedings, and how innocent co-owners or family members would be protected. Some participants expressed concerns about the lower civil standard of proof and how this may lead to the potential for discriminatory application.

- **Legal Process and Timelines:** Participants requested information about timelines, what happens to property during legal proceedings, and how individuals would navigate the Civil Forfeiture process. Concerns focused on whether individuals would have adequate time and support to respond to proceedings, particularly given the complexity of legal processes and limited access to legal services in many NWT communities.
- **Burden of Proof:** Participants were very concerned about the lower standard of proof in Civil Forfeiture compared to criminal cases, and about requiring people to prove their property was not acquired as a result of crime. They worried that this lower standard, combined with limited access to lawyers in the NWT, could mean property gets taken from people who can't afford to defend themselves properly.
- **Misuse:** Participants raised concerns about the potential for Civil Forfeiture to be misused or applied in discriminatory ways, particularly against Indigenous, Black, and other People of Colour, and other marginalized populations.

- **Distrust:** Participants also raised concerns related to issues of trust in government, the history of discriminatory enforcement, and that any property-based enforcement could disproportionately affect Indigenous residents.

Theme 6: Capacity, Resources, and Regional Fairness

Participants raised questions about capacity, resources, and regional considerations for implementing Civil Forfeiture across the territory. Concerns focused on whether sufficient staff and resources would be available, where positions would be located, how the legislation would be adapted to different community contexts, and what protections would exist against retaliation.

- **Capacity and Staffing:** Participants asked how many positions would be created, where staff would be located, and whether there would be sufficient capacity to handle the caseload. The questions reflected concern that, without adequate staffing distributed regionally, the legislation may create another under-resourced program that cannot deliver on its intended purpose.
- **Regional Fairness:** Participants expressed concern that positions and resources might be concentrated in Yellowknife, leaving smaller communities without adequate service or benefit despite experiencing the impacts of criminal activity.

Online Survey Statistics

GNWT received 120 responses for the Civil Forfeiture Survey. Statistical analysis of the questions where participants were asked to choose between preset answers shows that:

- 59% of respondents believed that taking away profits made from crime would deter people from engaging in criminal activity (24% no, 17% unsure).
- 57% believed that taking away property used to commit crime would prevent people from engaging in those criminal activities in the future (29% no, 14% unsure).
- Top priorities (*selected from multiple choice*) for use of forfeited funds: addiction treatment (72 responses), victim services and supports (67 responses), and community programs (62 responses).
- Most respondents expressed concern (very concerned or somewhat concerned) about Civil Forfeiture impacting people not directly involved in criminal activity.
- 44% believed that people not involved in criminal activity, but who may have an interest in property would be able to notify the court or GNWT that they are impacted (30% unsure, 26% no).
- Top transparency measures (*selected from multiple choice*): annual reporting (74 responses), supporting community programs with forfeited money (68 responses), and public outreach and education (61 responses).
- 63% indicated Civil Forfeiture would be very effective or somewhat effective at improving community safety (33% not very or not at all effective, 3% unsure).

Key Takeaways

Feedback on Civil Forfeiture legislation revealed strong support for removing profit from crime, paired with concern about whether the legislation will achieve this goal without causing unintended harm. Participants consistently expressed frustration with visible criminal activity in their communities and supported accountability measures. However, this support was conditional. Participants questioned whether the

legislation would effectively target organized criminals operating from outside the territory, or, instead, primarily impact vulnerable residents who lack resources to defend themselves in civil proceedings.

The most significant implementation concerns centered on:

- Capacity for effectively targeting out-of-territory criminals.
- Regional equity and limited access to justice in remote communities.
- Fear of discriminatory application or misuse of legislation (because of the lower burden of proof).

Participants emphasized the need for protections for innocent dependents, coordination with social services, and transparency in how forfeited funds would benefit communities. Several participants noted that without complementary investments in addiction treatment, housing supports, and prevention measures, Civil Forfeiture risks deepening existing vulnerabilities rather than supporting community safety. The feedback indicates that support for Civil Forfeiture is contingent on:

- Demonstration that the legislation can reach its intended targets.
- Inclusion of adequate safeguards against misuse.
- Provision of accessible legal protections.
- Support for regional equity.
- Integration with broader community safety strategies.

Participants view Civil Forfeiture as one potential tool rather than a comprehensive solution, with effectiveness dependent on design details, resource allocation, and coordination with social supports.

Implementation Considerations

In addition to providing feedback on specific questions related to proposed legislation, participants volunteered their comments and views on areas where they thought GNWT needed to consider when moving forward with the proposals. This feedback has been summarized into the following themes.

Legal Process and Timelines:

- Status of property while cases are pending.
- Protections for innocent co-owners or family members during proceedings.
- Duration of administrative and court processes.
- Timeline and procedures for appeals.

Application and Scope:

- Application of Civil Forfeiture to government-owned housing.
- Treatment of property registered outside the NWT.
- Handling of cases involving multiple owners or users.
- Approach to investigations involving family members of the Civil Forfeiture team and potential for conflict of interest.
- Differential treatment of essential property (vehicles for subsistence) versus luxury assets.

Capacity and Structure:

- Number and location of staff positions.
- Implementation costs and resource requirements.
- Capacity to handle anticipated caseload.

- Coordination with existing court and policing capacity.

Regional Equity:

- Distribution of forfeited funds between communities.
- Proportional benefit to smaller communities.
- Location of any potential staffed positions that are created in the future to enforce this legislation.
- Regional distribution of staff versus centralization in Yellowknife.

Interprovincial Coordination:

- Coordination mechanisms with other provinces for assets held outside the territory.
- Applicability of forfeiture orders to property registered in other jurisdictions.
- Mechanisms for tracking criminals operating from outside the NWT.

Safeguards and Protections:

- Specific protections for dependents (children, elders, persons with disabilities).
- Coordination structures with social services.
- Funding or support for legal representation.
- Oversight mechanisms to prevent discriminatory application.

Safer Communities and Neighbourhoods (SCAN)

Theme 1: Support for Stronger Action to Address Crime and Community Harm

Participants across multiple communities expressed support for tools to address problem properties where drug dealing, bootlegging, and other illegal activities occur. Many participants described frustration with known drug houses operating openly in their communities with limited ability to act under current systems.

- **Problem Properties:** Participants described problem properties as visible, well-known features of their communities that create widespread impacts on safety, property values, and quality of life. The frustration expressed was about properties where illegal activity occurs openly with what participants perceived as limited consequences under current systems. Many emphasized that community members, landlords, and housing authorities are aware of these properties but feel constrained in their ability to take effective action.
- **Personal Responsibility:** Participants supported holding people accountable for their actions and agreed that there should be consequences for illegal activities. Many said they are frustrated by what they see as a growing acceptance of drug use and organized crime in some communities and stressed the need to take action.
- **Enforcement Support:** Participants expressed support for having additional tools available to address known problem properties, though many emphasized the need for sustained commitment rather than short-term initiatives. The support reflected both urgency about current conditions and concern that effective implementation would require long-term investment and capacity building.

Theme 2: Authority, Effectiveness, and Safety

Participants raised concerns about whether SCAN officers would have enough authority to be effective, whether eviction-based measures would reduce crime or simply push it elsewhere, and how people would be protected from retaliation. Overall, these concerns reflected doubts about whether SCAN would

meaningfully improve current systems or whether it would add another layer of administration.

- **Authority:** Participants raised concerns about whether SCAN officers would have enough authority to be effective, whether eviction-based approaches would meaningfully reduce criminal activity or simply displace it, and what protections would exist against retaliation. These concerns reflected underlying skepticism about whether SCAN represents a genuine improvement over existing systems or adds another administrative layer without addressing fundamental limitations in enforcement capacity and approach.
- **Consistency and Objectivity:** Beyond questions of authority, participants expressed concern about inconsistent application of existing rules and whether SCAN would address these problems or simply replicate them. The concern centered on whether decision-making would be standardized across officers and communities, and whether eviction orders would be effectively enforced to prevent individuals from immediately returning to the property after eviction. Participants were concerned SCAN would just add another layer of bureaucracy on top of the *Residential Tenancies Act*. Participants worried that, if problems with that system are not fixed, like inconsistent enforcement, SCAN may not work as intended.
- **Effectiveness:** Participants questioned whether SCAN would meaningfully reduce criminal activity or simply move it between properties and communities. The concerns reflected skepticism about eviction-based approaches when drug dealers are often transient, use other people's properties, and can quickly relocate operations. Several participants noted that advance notice requirements and investigation timelines may allow those engaged in illegal activity to avoid consequences while vulnerable property holders face eviction.
- **Safety and Retaliation:** Participants raised concerns about potential retaliation against both complainants and SCAN officers themselves, reflecting the reality that in small communities, reporting illegal activity can expose individuals and their families to threats or violence. Questions focused on what protections would exist for those who report problems and whether SCAN officers would have adequate safety measures to operate effectively.

Theme 4: Concerns About Vulnerable Persons and Unintended Impacts

Participants raised concerns about how SCAN orders would affect vulnerable people, particularly children, elders, individuals with disabilities, and those struggling with addictions who may be involved in illegal activities as intermediaries. Questions focused on what happens to vulnerable dependents when properties are subject to orders, where evicted individuals would go, and whether enforcement would address root causes.

- **Vulnerable Residents, Children, and Dependents:** Participants described patterns where vulnerable residents, particularly those with addictions, financial struggles, or social isolation, are exploited by individuals engaged in drug dealing who use their properties as bases of operation. The concern was that SCAN investigations targeting properties could result in evicting the vulnerable property holder, while those engaged in serious criminal activity simply move to exploit another vulnerable person elsewhere. Participants also expressed concern about unintended impacts on children, elders, and other dependents who live in properties subject to SCAN orders, reflecting a balance between supporting consequences for criminal activity and protecting innocent household members who may have limited ability to influence the actions of others in their homes.
- **Housing and Homelessness:** Participants raised questions about what happens after eviction in a territory with severe housing shortages. This concern is grounded in the practical reality that alternative

housing options are extremely limited, shelters have insufficient capacity, and eviction often leads directly to homelessness rather than relocation.

- **Addressing Root-Causes of Crime:** Participants emphasized that enforcement measures alone would not address the underlying conditions that enable criminal activity to take hold in communities. Many expressed concern that SCAN focuses on displacement rather than prevention, treatment, or addressing the social determinants that make individuals vulnerable to exploitation or involvement in illegal activity.

Theme 4: Capacity, Resources, and Regional Fairness

Participants raised questions about capacity and resources for implementing SCAN across all communities in the NWT. Concerns focused on staffing levels, response times, where officers would be located, and whether smaller communities would receive equitable service.

- **Capacity, Staffing and other Community Considerations:** Participants raised questions about whether sufficient resources and capacity would be available to implement SCAN effectively across all of NWT's communities with diverse contexts, property ownership structures, and levels of existing enforcement presence. The concerns reflected tension between urgency about community safety issues and skepticism about whether the GNWT could deliver effective services outside of Yellowknife without substantial regional investment.
- **Regional Distribution:** Participants expressed concerns about Yellowknife-centric implementation and emphasized the need for regional equity in service delivery. The concerns reflected broader patterns in territorial administration, where regional communities often feel underserved relative to the capital, with resources and positions concentrated in Yellowknife, despite smaller communities experiencing significant impacts from the issues the legislation aims to address.
- **Timeline and Urgency:** Despite questions about capacity and implementation details, participants in several communities expressed impatience with the pace of legislative development and strong desire for immediate action. The urgency reflected frustration with what participants perceived as prolonged consultation processes while community safety continues to deteriorate.

Theme 5: Due Process, Legal Safeguards, and Potential for Misuse

Participants raised concerns about due process protections, eviction timelines, record impacts, and potential for the legislation to be misused through false or discriminatory complaints. The concerns centered on whether adequate safeguards exist to protect individuals from unfounded investigations, how anonymous complaints would be verified, and whether SCAN could be weaponized to target vulnerable populations or settle personal disputes.

- **Misuse:** Participants raised concerns about potential for SCAN to be misused through false complaints, discriminatory application, or as a tool for landlords to remove tenants for reasons unrelated to actual criminal activity. Many participants emphasized that in communities where everyone knows each other, anonymous reporting systems can become vehicles for settling personal grievances or targeting individuals based on bias rather than legitimate safety concerns. At the public engagement meetings, it was clarified that the proposed SCAN model will be a confidential, rather than anonymous, complaint process.
- **Constitutional Concerns and Legality:** Participants raised concerns about whether SCAN legislation violates constitutional protections, pointing out to examples of legal challenges in other jurisdictions

mentioning due process, privacy rights, and state overreach. They also identified the risk that SCAN could bypass protections afforded through the criminal law process (such as a higher threshold for burden of proof), and the nature of the complaints-based process, (that puts people under investigation with little proof). Participants commented that implementation of legislation as proposed could raise the risk of potential serious consequences for people, such as losing housing.

- **Transparency and Accountability:** Participants requested mechanisms to ensure SCAN operates transparently and with appropriate oversight, particularly given concerns about potential for misuse and the significant consequences of investigations. The emphasis was on public accountability through regular reporting and independent review processes to build and maintain trust in the system, especially given the significant mistrust expressed by some respondents about government capacity to implement the legislation fairly.

Online Survey Statistics

The GNWT received 156 responses for the SCAN Survey. Statistical analysis of the questions where participants were asked to choose between preset answers shows that:

- Drug trafficking was by far the most significant concern among survey respondents (138 responses), followed by human trafficking (66), bootlegging (50), prostitution (42), and other activities (34) (*selected from multiple choice*).
- 67% of respondents identified illegal activities at residential properties as a major problem in their community, with an additional 17% viewing it as a moderate problem.
- Respondents were equally divided on whether SCAN would improve community safety, with roughly equal proportions believing it would be very effective (30%), somewhat effective (33%); other options included not very effective (15%), not at all effective (9%), and unsure (13%).
- Most respondents expressed significant concern about impacts on vulnerable persons, with the largest portions indicating they were very concerned (44%) or somewhat concerned (13%) about effects on children, elders, persons with disabilities, and people struggling with addictions.
- Top concerns about SCAN implementation (*selected from multiple choice*): risk of discrimination or misuse (72 responses), risk of unfounded complaints (58), fairness to property owners (54), fairness to tenants (50), cost to government (43), and privacy or confidentiality issues (42).
- 72% of respondents supported SCAN officers having authority to initiate investigations on their own initiative in addition to responding to complaints (13% opposed, 15% unsure).

Key Takeaways

Feedback on the SCAN legislation showed support for having tools to deal with problem properties, along with serious concerns about whether the law could do more harm than good. Participants expressed frustration with known drug houses operating openly in their communities and supported stronger enforcement options. At the same time, many questioned whether SCAN would truly address organized criminal activity or mostly affect vulnerable residents whose properties are exploited, while serious traffickers simply move their operations elsewhere.

The most significant implementation concerns centered on three issues, namely:

- Impacts to vulnerable persons within the context of the territory's perceived housing shortage.
- Whether SCAN would be effective given that decisions would be made by Rental Officers despite existing Rental Office constraints rather than through court orders as in SCAN legislation in most other jurisdictions.
- The risk of discriminatory application through anonymous complaints.

Participants stressed that eviction-based approaches could harm innocent dependents and noted that, because housing options are limited in many communities, eviction often leads to homelessness rather than other housing. They also raised questions about SCAN officers' authority compared to the Rental Office, staffing levels, and the ability to serve all NWT communities. Together, these concerns reflect doubts about whether the legislation would truly improve outcomes or simply add more bureaucracy without enough enforcement power.

The feedback indicates that support for SCAN is contingent on:

- Demonstration that the legislation can effectively stop illegal activities in residential properties beyond simply moving the activities of vulnerable intermediaries in the drug trade.
- Inclusion of adequate protections for innocent dependents within the housing crisis context.
- Integration with housing stability and social services to protect vulnerable persons.
- Provision of SCAN officers with sufficient regional capacity.
- Establishment of robust safeguards against false complaints and discriminatory application.

Strong opposition in written submissions from housing and social service organizations, along with concerns about constitutional issues and possible misuse in small communities, suggest that implementing SCAN may be challenging. Participants generally saw SCAN as one tool among many, not a complete solution. They emphasized that its success would depend on addressing root causes, strengthening existing systems, and ensuring there are enough resources and safeguards in place.

Implementation Considerations

In addition to providing feedback on specific questions related to proposed legislation, participants volunteered their comments and views on areas where they thought GNWT needed to consider when moving forward with the proposals. This feedback has been summarized into the following themes.

Authority and Decision-Making:

- Independent referral authority versus requirement to work through landlords.
- Guidelines governing when eviction orders can be sought.
- Specific thresholds or criteria triggering action (number of complaints, types of incidents).
- Appeal processes for conflicts of interest.

Eviction Process and Impacts:

- Timeline from investigation to eviction order.
- Seasonal variations in timelines or procedures (winter versus summer).
- Housing alternatives for evicted individuals.
- Re-application periods following eviction.
- Impact of eviction records on future housing applications.
- Differentiation of eviction records initiated through SCAN versus Rental Office.

Protection of Vulnerable Persons:

- Protections for children, Elders, and other dependents.
- Coordination mechanisms with social services.
- Treatment of vulnerable people exploited by drug dealers.
- Handling of underage individuals involved in dealing.
- Alternative housing or support for innocent household members.

Capacity and Resource Allocation:

- Number and location of SCAN officers.
- How quickly the legislation can be rolled out and how much it will cost.
- Service delivery model for smaller communities.
- Regional officer placement versus travel from Yellowknife.
- Response times for complaints in remote communities.

Safety and Enforcement:

- Protections from retaliation for complainants.
- Safety measures for SCAN officers.
- Equipment and weapons policies for SCAN officers.
- Partnership protocols with RCMP during investigations.
- Measures to prevent displacement of crime to other properties or communities.

Integration with Existing Systems:

- Coordination protocols with the Rental Office.
- Potential amendments to *Residential Tenancies Act* for clarity on eviction procedures.
- Application to rental properties versus owner-occupied properties.
- Coordination between SCAN and Civil Forfeiture enforcement.
- Relationship between SCAN and existing RCMP investigations.

Transparency and Accountability:

- Transparency mechanisms and oversight structures.
- Public reporting requirements on SCAN activities and outcomes.
- Oversight to prevent misuse or discriminatory application.
- Tracking and addressing of unfounded complaints.
- Penalties for filing false complaints.

Community Context and Adaptation:

- Adaptation to different property ownership structures (limited private landlords in some communities).
- Working relationships with Indigenous Governments in communities.
- Tailoring of implementation approaches to community-specific needs.
- Role of local governments in enforcement.

Other Public Safety Challenges

Throughout the engagement process, participants raised concerns and provided feedback on broader issues related to community safety, justice systems, and social services that, while not directly about the specific provisions of the proposed legislation, were deemed relevant by participants to share with the GNWT.

These comments provide important context about the environment in which the legislation would be implemented and highlight related systemic issues that participants felt should be considered.

Criminal Justice System Effectiveness

Multiple participants expressed frustration with what they perceived as inadequate consequences for criminal activity under the current system. Survey respondents wrote about “revolving door sentencing” and concerns that individuals are released quickly after arrest without meaningful accountability.

A Yellowknife participant noted, “We know who the drug dealers are, but we seem to struggle to even prosecute them.”

Some participants expressed concern that new legislation would be ineffective if underlying issues in the justice system remain unaddressed. A Fort Smith respondent wrote, “I’m very concerned with everything happening but majority of the people including those in positions of authority are on bad drugs and go unpunished.”

Need for Comprehensive Approaches

Many participants emphasized that enforcement legislation alone would not address community safety concerns without concurrent investments in prevention, treatment, and social services. Survey respondents repeatedly stated that addressing “root causes” including poverty, trauma, lack of housing, and inadequate mental health and addiction services should be priorities alongside or instead of enforcement measures.

A Yellowknife survey respondent wrote, “I can’t understand why governments keep choosing to spend copious amounts of time and money creating legislation and strategies to reduce crime while openly ignoring the proven fact that inequity and systemic disenfranchisement of vulnerable populations that lead to poverty are the foundation of crime.”

Participants noted gaps in existing services, particularly around addiction treatment capacity in the territory. Multiple respondents emphasized the need for treatment centers within communities, so people do not have to leave the NWT to access services. An Inuvik participant stated, “Funds should go to programs to help people, for example regional treatment centers so people should not have to move away from their community to get help.”

RCMP Capacity

Participants raised concerns about RCMP capacity, response times, and accountability and how this may impact the implementation of the civil forfeiture legislation. Multiple survey respondents described experiences where RCMP did not respond to calls or took extended periods to follow up on reported crimes.

Housing Crisis

Participants emphasized that the territory’s severe housing shortage must be considered when developing legislation that could result in evictions or loss of housing. Multiple survey respondents noted that adding to homelessness would worsen rather than improve community safety.

“To go through the work and time to action a case only to see those charged set free by the courts is a useless outcome and will end any community buy-in as we will see that nothing will change for the better.”

Hay River Survey Participant

Government Capacity and Impact

Some participants expressed skepticism about whether the GNWT has capacity to implement new legislation effectively given concerns about existing program delivery. A Yellowknife survey respondent wrote, “Anything will be better than the disgraceful mess we have now. But I have no faith in this initiative, it will be another feeble GNWT wishy washy strike out.”

Participants emphasized the importance of sustained commitment and adequate resourcing rather than short-term initiatives. A Hay River participant asked, “I think this is a long game, it’s not all going to be fixed in six months’ time. What is the GNWT’s commitment for the long term?”

“My concern is the GNWT complicating the effort with too many idea people, and not enough to do it.”

Hay River Participant

Residential Tenancies Act Updates

Multiple participants noted that the NWT’s *Residential Tenancies Act* has not been updated since 1988 and suggested that modernizing tenant-landlord legislation should be considered alongside or as an alternative to SCAN. Survey respondents noted the lack of rent control and concerns about tenant protections. A Hay River participant stated, “In the tenancy act, there are parts that are vague. If we amend that, that would have a significant impact.”

Need for Collaboration with Indigenous Governments

Written submissions from Indigenous Governments emphasized the desire for the collaboration on implementation.

The submission by Délı̨ne Got’ı̨ne Government emphasized that “GNWT officers should serve in a supportive role to front-line community officials” and that “the legislation should specifically require GNWT officers to collaborate with local law enforcement and community governments and organizations.”

“The legislation should expressly recognize the role and authority of Indigenous Governments” and “provide direct pathways for local governments to implement the statutes in their own communities.”

Written Statement by Délı̨ne Got’ı̨ne Government

Calls for Balanced Approach

Some participants urged the GNWT to balance enforcement with support, recognizing that many individuals engaged in illegal activity are themselves vulnerable and traumatized. A Yellowknife survey respondent wrote, “We need consistent, reliable, and lasting support for vulnerable people. Pilot programs and programs that only have funding for 3-4 years do not make lasting positive changes. We need more housing, mental health supports, addictions support, and compassion for those who are suffering the effects of intergenerational trauma, residential school survivors, and oppressive colonialism.”

Moving Forward

The GNWT will use the feedback received to improve the draft Civil Forfeiture and SCAN laws before asking Cabinet for approval to introduce them in the Legislative Assembly. Concerns raised about due process protections, safeguards against discriminatory application, protections for vulnerable persons, and regional implementation will inform specific legislative provisions. Questions about capacity, staffing, regional distribution of resources, coordination with social services, and oversight mechanisms will guide detailed implementation planning.

If the legislation is passed by the Legislative Assembly, implementation will proceed in phases to ensure systems, staff, and partnerships are in place before programs become operational. This will include establishing offices and hiring staff, developing detailed policies and procedures, creating training programs, finalizing coordination protocols with other partner agencies and governments, and conducting public education.



Appendix A: Engagement Methodology

Engagement Methods

The GNWT conducted public engagement on the proposed Civil Forfeiture Act and Safer Communities and Neighbourhoods Act between October 27 and November 28, 2025. The engagement used multiple methods to gather feedback and make it easy for many people to take part. Residents and representatives of communities and other interested parties were provided with a variety of opportunities to hear more about the proposed legislations, ask questions and provide feedback. The range of methods used for this engagement included:

- In-person community meetings across five different communities;
- Virtual meetings to provide opportunity to those who do not reside in those communities or could not travel to the in-person meeting;
- Online survey;
- Written Submission; and
- Invitations from Department of Justice and GNWT for feedback and meetings with Indigenous Governments and other interested organizations.

More details of these methods are provided in the following sections.

In-Person Community Meetings

Five in-person community engagement meetings were held across the territory:

- Fort Smith (October 27, 2025) – 5-6 attendees
- Hay River (October 28, 2025) – 12 attendees
- Norman Wells (November 17, 2025) – 2 attendees
- Yellowknife (November 18, 2025) – 8 attendees
- Inuvik (November 19, 2025) – 22 attendees

They provided residents with opportunities to ask questions, discuss concerns, and share feedback directly with GNWT officials. Sessions included presentations on both pieces of proposed legislation followed by facilitated discussions.



Virtual Meetings

Two virtual engagement sessions were offered to increase accessibility for residents unable to attend in-person sessions:

- English session (November 25, 2025)
- French session (November 26, 2025)

Virtual meetings allowed participation from residents across the territory regardless of location and provided options for those preferring remote participation.

Online Survey

An online survey was made available throughout the engagement period (October 27 – November 28), enabling residents to provide structured feedback on specific aspects of both the Civil Forfeiture Act and SCAN Act. The survey included questions about potential impacts, concerns, and suggestions for implementation.

For more details on the structure and content of the online survey, please see the Appendix in this document.

Written Submissions

The GNWT accepted written submissions throughout the engagement period from individuals, organizations, and Indigenous Governments. Written submissions provided opportunities for more detailed feedback and analysis, particularly from organizations with expertise in housing, social services, legal services, and community safety.

Stakeholder and Indigenous Governments Engagement

The GNWT invited feedback from all Indigenous Governments in the NWT and engaged with any who had

feedback or concerns about the proposed legislation. The Department also invited feedback directly from a wide range of stakeholders and partners, including:

- Professional organizations
- Victim services and community justice groups
- Royal Canadian Mounted Police (RCMP)
- Judiciary
- GNWT agencies and departments
- Chambers of Commerce
- Disability advocacy groups
- NWT Seniors' Society
- Housing and social service providers
- Legal service organizations

This targeted outreach ensured that organizations with specialized knowledge and frontline experience in areas affected by the legislation had opportunities to provide input.

Geographic Distribution

Feedback was received from residents across the NWT, including both regional centers and smaller communities. While in-person sessions were held in five communities, survey responses and written submissions were received from residents of communities throughout the territory, including but not limited to Fort Smith, Hay River, Norman Wells, Yellowknife, Inuvik, Behchokò, Fort Simpson, Fort Liard, Fort Resolution, Fort McPherson, Aklavik, Délı̄nę, and Łutselk'e.

The engagement used different methods to gather perspectives from all regions and communities of all sizes.





Appendix B: Summary of Responses

This report has organized the feedback into major themes that reflect issues raised repeatedly across different communities and engagement methods. These themes are based on concerns, questions, and views that what people consistently shared during in-person sessions, through surveys, and in written submissions.

Each theme reflects a different type of feedback, including support for the purpose of the legislation, concerns about how it would be carried out, its impact on certain groups, and the need for legal protections. The themes are organized to move from areas of support to practical concerns, and then to questions about fairness, due process, and oversight.

Within each theme, we identified sub-themes to explain specific issues in more detail. This approach helps show both the overall patterns in the feedback and the different views within each theme. Each theme and sub-theme is supported by direct quotes from participants and survey respondents to reflect both what was said and how strongly people felt.

Civil Forfeiture

Civil Forfeiture Feedback at a Glance

Feedback on Civil Forfeiture legislation reflected support for the principle of removing profit from crime, alongside concerns about implementation, impacts on vulnerable people, regional equity, and legal process protections.

Support and Concerns

Areas Where Support Was Expressed:

- Removing profits and assets from those engaged in criminal activity.
- Addressing visible displays of wealth from illegal activities.
- Using forfeited funds for community programs, victim services, and addiction treatment.

- Holding individuals accountable for criminal conduct.
- Holding property owners accountable when they knowingly facilitate criminal activity.

Areas Where Concerns Were Raised:

- Impacts on children, elders, and vulnerable dependents.
- Whether Civil Forfeiture would effectively target out-of-territory criminals or primarily impact vulnerable residents.
- Due process protections, burden of proof, and access to legal representation.
- Potential for discriminatory application against Indigenous peoples and marginalized populations.
- Safety and retaliation concerns for those who report criminal activity.
- Regional equity in distribution of forfeited funds and concentration of positions in Yellowknife.
- Capacity and resources to implement effectively across all NWT communities.
- Whether enforcement addresses root causes or requires integration with addiction treatment, housing supports, and social services.
- Transparency and accountability in how forfeited funds are allocated and used.
- Legal process timelines and what happens to property during proceedings.

Civil Forfeiture: Detailed What We Heard

Theme 1: Support for Removing the Profit from Crime

Across all engagement activities, participants showed strong support for Civil Forfeiture as a way to take profits away from criminal activity. Many shared examples of seeing signs of illegal wealth in their communities and supported actions that would limit people's ability to benefit from crime.

Visible Signs of Illicit Profit

Participants described observing individuals in their communities with expensive vehicles, recreational equipment, and other assets despite having no apparent legitimate source of income. These observations were indicated as visible evidence of proceeds from drug trafficking and other illegal activities. The pattern created frustration among community members who viewed it as demonstrating that criminal activity generates financial benefits without meaningful consequences.

One survey respondent described the visibility of this dynamic: "Get criminals hurting our community and living at a higher standard, avoiding taxes and destroying hard working and honest residents."

"We know people who have cars, boats in their yards and have not worked in years. How can they afford them?"

Participant in Norman Wells

Real Consequences

Participants supported measures that create real consequences for people involved in criminal activity and prevent them from continuing to profit from illegal conduct. This support reflected a belief in personal accountability for criminal choices, as well as frustration with what participants saw as the growing normalization of drug trafficking in some communities.

An Inuvik participant emphasized the urgency stating, “Youth groups, kids are being victimized. We need to do something.” Another survey respondent expressed support for action: “We need to implement new things to make Yellowknife a nicer place to live again. “One participant noted the normalization of criminal activity: “We must act to change the dynamic in the community. Trafficking drugs has been normalized in the recent years.”

Several participants emphasized the importance of holding property owners accountable when they knowingly allow criminal activity. One survey respondent stated, “I think even if you are a property owner but allow criminal activity to occur on your property or with your property, it should be eligible for forfeiture.” Another wrote about a specific situation: “All rent collected by these owners should be considered proceeds of crime – because it is.”

“Everyone is accountable for their own actions. You break the law; there should be consequences.”

Hay River Survey Respondent.

Theme 2: Effectiveness

Participants shared mixed views on whether Civil Forfeiture would reduce criminal activity and whether there is enough capacity to enforce the law effectively. Some felt that taking away assets could disrupt criminal operations and create real consequences. Others questioned whether it would deter drug trafficking, especially when people involved are coming from outside the NWT.

Deterrence

Views on whether Civil Forfeiture would deter crime varied widely. Some participants felt that taking away profits would disrupt criminal activity and create real consequences that could discourage involvement. Others were skeptical, questioning whether people involved in drug trafficking, especially those affected by addiction, poverty, or tied to larger criminal networks, would change their behavior due to the risk of losing assets. Concerns focused on whether financial penalties would be effective when people may not expect to be caught or may not own significant assets in the NWT.

A Hay River participant stated, “After working as a correctional psychologist, I think it would slow them down. There are fewer assets to get around if you seize it.” One survey respondent wrote “It will send a clear message to criminals once it's implemented.” A Fort Smith participant noted simply, “It is the right thing to do. It will reduce crime.”

However, several participants questioned whether Civil Forfeiture would meaningfully deter criminal activity, particularly given the mobility of dealers and the limited number of assets owned locally. A Fort Smith participant stated, “No, I don't think this will deter criminal activities.” A Yellowknife participant noted, “Most drug dealers come from the south, so they have no property in NWT,” while another Yellowknife participant added, “It will not deter people. They can claim the losses on their insurance.”

“I think over time there will be a deterrence factor with this legislation.”

Survey Respondent.

One survey respondent raised the issue of motivation, writing, “I am under the impression people don't commit crimes expecting to be caught,” while another emphasized root causes: “We need to address the root cause of crime which is often poverty. If people need money, they will not be deterred by this.”

Out-of-Territory Criminals

A recurring observation was that many drug dealers operating in NWT communities are not residents and do not own property in the territory. Instead, participants described patterns where out-of-territory dealers exploit locals by using their homes and vehicles as bases for drug operations.

A Hay River participant described this pattern: “Most of these drug dealers are not from here... They find a user, stay at their place, and use their car or truck.”

A survey respondent emphasized the need for prevention measures and interprovincial coordination. One wrote, “Prevention would do better than taking assets after the fact, such as border patrol checks. Most of these people are foreign to the North, would the forfeiture include assets they have in BC, Ontario, etc.?” Another asked, “What we think we are seeing is the movement of drugs and weapons from other provinces. How will NWT coordinate with those provinces to ensure these laws affect non-NWT residents who come into the territories and profit?”

“My worry is that in my neighbourhood there are 5 drug dealers there. They're all on the lease with them... My neighbors are being taken advantage of, their vehicles are being used to transport drugs.”

Hay River Participant

Retaliation and Safety

Participants raised concerns about potential retaliation against those who report illegal activities, reflecting the reality that, in small communities, providing information about criminal activity can expose individuals and their families to threats or violence.

A Fort Smith participant noted, “There have been many houses gone up in flames in the South Slave, and these feel like intimidation.” Another Fort Smith participant stated, “What protections do you have for a person providing information? I have called and wanted to provide what I have seen, but I don't want to give my name... If you don't have any protections in place-- people are not going to call and report this.” An Inuvik participant asked, “How are you going to protect people close to those committing a crime if they make a complaint?”

However, one survey respondent challenged concerns about community division: “There has been concern about this being legislation that allows one to ‘rat out one's neighbour’ and therefore it is divisive to the community. I think that argument is flawed. The division to the community has already happened through the activity and harm has and continues to ensue. If one's neighbour is engaging in this anti-community activity, then there is nothing wrong with ‘ratting them out’ and perhaps one has a duty to the community to ‘rat them out’.”

Theme 3: Use and Distribution of Forfeited Funds

Participants across all communities supported using forfeited funds to benefit communities, especially for programs that support victims, youth, and addiction treatment. They also emphasized the importance of fair distribution across regions and asked for transparency about how funds would be allocated among communities.

Community Investment

Participants stressed that money taken through forfeiture should be reinvested directly back into communities, rather than going into general government revenues. They wanted to see clear, local benefits from enforcement actions and raised concerns that, without clear rules, forfeited funds could be absorbed

into general revenue with no direct benefit to the communities affected by criminal activity.

A Norman Wells participant stated: “We need to put the money in good use in our community.” An Inuvik participant emphasized: “Do not put seized funds in government pocket – they need to be invested in the community.”

One survey respondent identified a specific gap in current processes: “There should be a clause to ensure that funds that are being considered as proceeds of crime, cannot be utilized for legal fees. This has been allowed in the past, and those funds are not recoverable, and the offender continues to benefit from those proceeds.”

“Funds should go to small organizations and food banks, youth centers, not government.”

Hay River Participant

Regional Fairness Concerns

Participants raised concerns that funding from forfeiture could follow existing patterns, with larger regional centers receiving most of the benefits while smaller communities see little impact. These concerns reflect broader frustration about fair access to government programs. Participants emphasized that communities affected by drug trafficking and related crime should see clear and direct benefits from forfeiture actions.

A Hay River participant stated: “Another concern - if you are from Hay River, you don’t get much. But it happens with everything. Arctic Winter Games only happen in Yellowknife. They want a regional approach to funding programs.”

Transparency and Accountability

Participants asked for clear information about how much money is taken through forfeiture and how it is used. They stressed that transparency is important for public trust and noted that without clear reporting requirements, communities would have no way to know whether forfeited funds are being used as intended. An Inuvik participant shared: “Let people know how much is going back into each community.” Another requested: “Could you put in the legislation how funds will be redistributed?”

Theme 4: Concerns About Vulnerable Persons and Unintended Impacts

Participants raised concerns about how Civil Forfeiture would affect vulnerable people, particularly children, elders, and individuals struggling with addictions. Questions focused on what would happen to dependents when property or assets were forfeited, whether individuals with addictions would be further marginalized, and how low-income or subsidized housing situations would be handled.

Children and Dependents

Participants were concerned about the impacts on children, Elders, and other dependents who live in homes that could be seized or rely on people whose assets may be taken. They highlighted the challenge of holding people accountable for criminal activity while also protecting innocent household members who often have little or no control over the actions of others in their home.

“We need to consider vulnerable people in the home and how they will be affected. But there needs to be consequences for people who do these actions.”

Inuvik Participant

A Hay River participant asked, “Has there been any thought about holding funds in trust for dependents? The stats are unbelievable; the deck is stacked against them. How can we help them with this? My concern is, as minors, will they be implicated and be considered victims or criminals?”

Support Services

Participants emphasized that enforcement measures alone would not address the underlying conditions that enable criminal activity or support those affected by it. Many stressed that Civil Forfeiture should be implemented alongside investments in addiction treatment, housing supports, mental health services, and poverty reduction rather than as a standalone enforcement tool.

A Hay River survey respondent wrote, “In terms of impact on children, vulnerable people, elders etc., it is a step in the right direction to address a problem that impacts everyone on many levels. Residents have a right to have a healthy environment.” A Yellowknife survey respondent stated, “What makes communities safer is ensuring people have care and supports to address trauma and addictions, adequate and affordable food and housing, quality education and employment opportunities.”

Another survey respondent wrote, “The goal should be to heal the root causes of why people are involved in illegal activities. Adding additional punishments will do nothing to change a person’s life for the better.” One respondent noted, “As poverty is the primary motivator of criminal behaviour, adopting this legislation without taking significant steps to ensure everyone in my community has fair and equitable access to housing and to meet their basic needs will only increase crime and provide more opportunities for criminal elements to prey on the vulnerable.”

Theme 5: Legal Process and Due Process Protections

Participants raised questions and concerns about due process, burden of proof, and protections for innocent property owners. Questions focused on legal timelines, what happens to property during proceedings, and how innocent co-owners or family members would be protected. Some participants expressed concerns about the lower civil standard of proof and potential for discriminatory application.

Legal Process and Timelines

Participants asked for clearer information about timelines, what would happen to property during legal proceedings, and how people would move through the Civil Forfeiture process. Concerns focused on whether individuals would have enough time and support to respond, especially given the complexity of legal processes and limited access to legal services in many NWT communities.

A Fort Smith participant asked: “Are the RCMP the judge and jury?” and “What happens to the property while they wait for their day in court? Is the property now out the resident’s hand? The judge can take a long time... is it one month? Three months? Following that, what if they were using that for rent? Are they going to be homeless based on that.”

“Concerns about peoples’ understanding of the process and time they have to respond. They might not understand the letters and notices they receive and how to respond and they will lose out.”

Burden of Proof

Participants raised serious concerns about the lower civil standard of proof required in Civil Forfeiture compared to criminal cases, and about placing the burden on individuals to prove their property is not linked to crime. They worried that this lower threshold, combined with limited access to legal services in the NWT, could result in property being taken from people who do not have the resources or support needed to properly defend themselves.

Yellowknife Participant

A Fort Smith participant stated, “I am worried about how this could be weaponized against innocent people. It’s about the how. We all want this. People can use these processes and procedures for their own selfish ends as well... The other thing is the low obligation of proof... It’s up to the person being investigated to prove they are innocent.” This participant also noted, “A lady in the Yukon ended up in the supreme court to get her property back. It was seized without her consent. She could not hire lawyers. Who supports the residents?”

Another survey respondent wrote, “Always a concern is access to justice. Even more so where the government gets a pass on proof to forfeiture.” One lawyer with Civil Forfeiture experience wrote, “Civil Forfeiture has an enormous potential for manifesting unfairness on people who may share property with people who are committing crimes (e.g. family homes, shared vehicles). People who are using and selling drugs in the communities, for example, are not career criminals, they are vulnerable and traumatized. Deterrence does not work in this context.”

Misuse

Participants raised concerns about potential for Civil Forfeiture to be misused or applied in discriminatory ways, particularly against Indigenous peoples, racialized individuals, and other marginalized populations. The concerns reflected broader issues of trust in government institutions, historical context of discriminatory enforcement, and demographic realities that mean any property-based enforcement will disproportionately affect Indigenous residents.

A Yellowknife survey respondent wrote, “I have no doubt this legislation will be weaponized by members of the public against racialized people and immigrants living in the NWT who have zero involvement in criminal activity.”

Another stated concerns about oversight: “I’m concerned about the territorial government’s egregious and unconstitutional overreach. I’m concerned about a general inability to govern current legislation.”

One survey respondent wrote, “Innocent people get caught up in this crap all the time. There are effective ways to have people managed but it seems most of the people in positions of power in this community are under the influence of drugs and illegal substances, and no one really does their job. This law will take from innocent people and give to the government all while not addressing the root of the problem.”

A respondent raised concerns about Indigenous impacts specifically: “Given demographics, any property seizure is disproportionately likely to affect Indigenous individuals and families. This intersects with historical mistrust of state authority, ongoing reconciliation commitments, overrepresentation in justice processes. This must be explicitly considered and mitigated.”

Several respondents expressed deep mistrust of implementation: “The system will be abused, and will be weaponized against vulnerable minorities, and persons. This is a new low for the GNWT.” Another wrote, “The RCMP and the GNWT do not respect citizens and do not follow laws and regulations. In my community, the RCMP are criminals dressed in police uniform.” Some respondents raised concerns about false allegations: “I’m worried about people making false claims out of spite.”

Theme 6: Capacity, Resources, and Regional Equity

Participants raised questions about capacity, resources, and regional considerations for implementing Civil Forfeiture across the territory. Concerns focused on whether enough staff and resources would be available, where positions would be located, how the legislation would be adapted to different community contexts, and what protections would exist against retaliation.

Capacity and Staffing

Participants asked how many positions would be created, where staff would be located, and whether there would be enough capacity to handle the anticipated caseload. The questions reflected concern that without adequate staffing distributed regionally, the legislation may create another under-resourced program that cannot deliver on its intended purpose.

Yellowknife participants asked: “How many positions will be created as part of this Civil Forfeiture legislation?” and “Will there be a cost benefits analysis done of the costs of implementation versus money that will be seized?”

A Yellowknife participant noted: “We know who the drug dealers are, but we seem to struggle to even persecute them. For example, one court case recently where the judge criticized the Crown for not disclosing vital evidence and case collapsed. Getting evidence currently through the courts is extremely problematic.”

“This will put additional enforcement requirements on our policing services. Do we have the capacity?”

Hay River Participant

Regional Equity

Participants expressed concern that positions and resources might be concentrated in Yellowknife, leaving smaller communities without adequate service or benefit despite experiencing impacts of criminal activity.

Fort Smith participants asked: “Is the Director going to be in Yellowknife? They’re going to be travelling all over.” Another stated: “Is this only creating positions in Yellowknife? That does not feel right. We want positions in our communities as well.” An Inuvik participant stated: “This is taking too long – we are losing a whole generation to drugs – drug dealers seem to have more power and are killing our young people. You need to move faster and take everything back from drug dealers.”

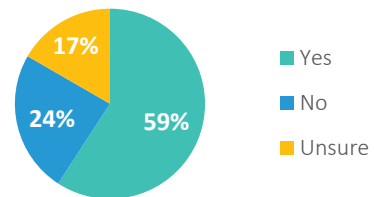
Survey Results

This section provides a detailed analysis of 7 out of 13 questions in the Civil Forfeiture survey which lend themselves to statistical analysis. The remaining 6 questions enabled participants to provide detailed thoughts and comments in text form. Those results have been analyzed together with comments received through the other engagement channels and included in the major themes summary in the previous section.

GNWT received a total of 120 responses for this survey.

Question 1: Do you think taking away **profits** made from crime will deter people from engaging in criminal activity in your community?

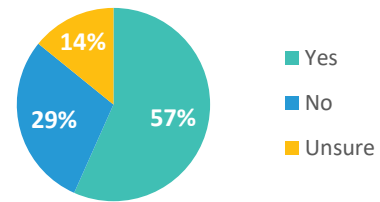
Majority of survey respondents (59%) indicated that they think taking away profits made from crime will deter people from engaging in criminal activity in their community, with 24% indicating No and 17% were unsure.



Source: NWT Civil Forfeiture Survey, Question 1.

Question 2: Do you think taking away **property that is used** to commit crime in your community will prevent people from engaging in those criminal activities in the future?

Responses were similar when people were asked whether taking away the property used for crime would also be a deterrent. 57% responded that they thought this would deter from future crime, 29% did not and 14% were unsure.

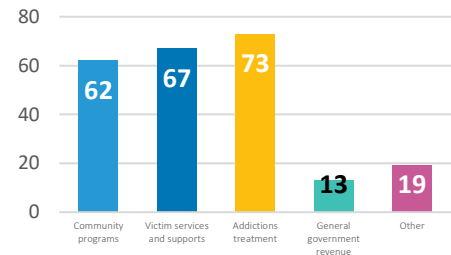


Source: NWT Civil Forfeiture Survey, Question 2.

Question 3: What initiatives would you like the GNWT to support with any forfeited cash or other funds generated through the sale of forfeited property?

Survey respondents could pick multiple choices for how the forfeited funds could be used. Majority of choices were for:

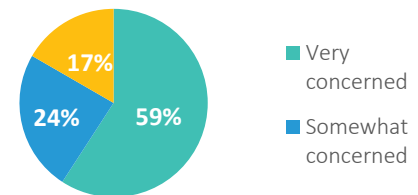
- addictions treatments (72)
- victim services and supports (67); and
- community programs (62).



Source: NWT Civil Forfeiture Survey, Question 3.

Question 4: How concerned are you that Civil Forfeiture may impact people who are not directly involved in the criminal activity?

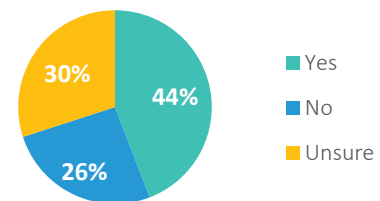
Survey respondents expressed significant concern about the impact of Civil Forfeiture on people not directly involved in criminal activity, with the majority (83%) indicating they were either very concerned or somewhat concerned.



Source: NWT Civil Forfeiture Survey, Question 5.

Question 5: Do you think that people in your community who are not involved in the criminal activity, but who may have an interest in the property, will be able to notify the court or the GNWT that they are impacted by Civil Forfeiture?

When asked whether people who are not involved in criminal activity, but who may have an interest in the property, should be able to notify the court or the GNWT, the majority said yes (44%). However, there was significant uncertainty (30%) and a sizable amount of no's (26%).

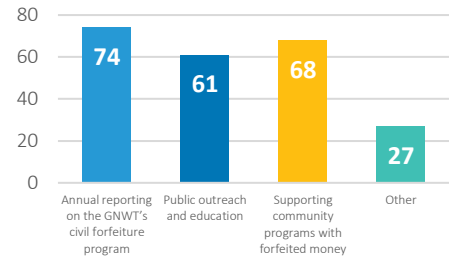


Source: NWT Civil Forfeiture Survey, Question 5.

Question 6: What can the GNWT do to ensure the Civil Forfeiture program is transparent and receives public support in your community?

The top 3 choices made by survey respondents as the best way for the GNWT to support transparency and achieve public support were:

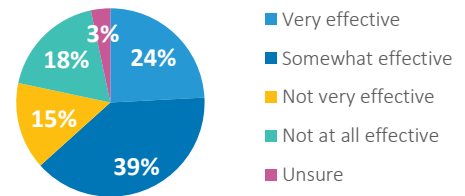
- annual reporting (74)
- supporting community programs (68), and
- public outreach and education (61).



Source: NWT Civil Forfeiture Survey, Question 6.

Question 7: How effective do you think Civil Forfeiture would be at improving safety in your community?

Most survey respondents (63%) indicated that Civil Forfeiture would be very effective or somewhat effective at improving safety in their community. However, 33% indicated it would be not very, or not at all effective, with 3% indicating uncertainty.



Source: NWT Civil Forfeiture Survey, Question 7.

Safer Communities and Neighbourhoods

SCAN Feedback at a Glance

Feedback on SCAN legislation reflected support for tools to address problem properties, alongside significant concerns about impacts on vulnerable persons (including both innocent dependents and individuals exploited as intermediaries in criminal activity), authority of SCAN officers, and regional implementation.

Support and Concerns

Areas Where Support Was Expressed:

- Addressing known problem properties where illegal activities occur.
- Providing additional tools to landlords and communities.
- Support for SCAN officers having authority to initiate investigations.
- Taking action on drug houses impacting community safety.
- Holding individuals accountable for illegal activities.

Areas Where Concerns Were Raised:

- Impacts on children, Elders, and vulnerable dependents.
- Exploitation of vulnerable residents by out-of-territory dealers.
- Whether SCAN officers would have sufficient authority beyond existing Rental Office processes.
- Whether eviction-based approaches would displace rather than reduce criminal activity.
- Potential for discriminatory application or misuse through false or anonymous complaints in small communities.

- Safety and retaliation concerns for complainants and officers.
- Capacity to implement effectively across all NWT communities.
- Regional equity (Yellowknife-centric implementation).
- Need for clear, objective criteria and consistent application.
- Whether enforcement addresses root causes or only symptoms.
- Constitutional concerns and due process protections.
- Need for transparency, accountability, and independent oversight.

SCAN: Detailed What We Heard

Theme 1: Support for Stronger Action to Address Crime and Community Harm

Participants across multiple communities expressed support for tools that would address problem properties where drug dealing, bootlegging, and other illegal activities occur. Many participants described frustration with known drug houses operating openly in their communities with limited ability to act under current systems.

Problem Properties

Participants described problem properties as highly visible and well known in their communities, with wide ranging impacts on safety, property values, and overall quality of life. Many expressed frustration that illegal activity appears to take place openly at these properties, with what they see as few consequences under current systems. Participants emphasized that community members, landlords, and housing providers are often aware of these properties but feel limited in their ability to take effective action.

Many expressed frustration that illegal activity appears to take place openly at these properties, with what they see as few consequences under current systems. Participants emphasized that community members, landlords, and housing providers are often aware of these properties but feel limited in their ability to take effective action.

Survey respondents provided detailed descriptions of impacts of problem properties on neighbourhoods, with a Hay River resident writing, “I see 24-hour drug use and distribution traffic to and from houses. Fear of neighbors to go outside their own homes, the endless theft of anything not locked up as these users try to pay for their drugs.”

Safety concerns were frequently mentioned. A Fort Smith respondent wrote, “People’s vehicles and homes are being burnt, broken into and shot up from drive by shootings. Drug users are owing lots of money to drug dealers. This is causing stress on innocent people including our children who cannot even walk down the street safely.” A Hay River participant noted, “People coming and going at all hours to purchase drugs. Often there is violence in these properties or outside of them. There have been a number of drug properties that have been intentionally set on fire by rival drug dealers.”

In addition, impacts on children and families were emphasized. A Hay River resident described, “Knowing what I know, there is no way I will let my 10-year-old daughter bike 15-minutes or walk 30-minutes to school on her own! The known drug dealer was circulating on a quad with me and my guard dog present! Last year, we had drug dealers trying to lure her from the back alley to the fence while she was in the trampoline.” In addition, a Yellowknife respondent wrote, “I’m sick of the crime in Yellowknife and the stuff my two kids have to see and endure every day. The last two years have seen Yellowknife move from a beautiful safe city to a garbage dump.”

“We know who the people are who are causing trouble and Housing NWT say their hands are tied.”

Norman Wells Participant

Multiple respondents emphasized urgency of addressing problem properties. An Inuvik resident stated in session, “We are in a state of emergency with regard to drugs.” A Yellowknife respondent wrote, “Yellowknife is out of control. We need some creative measures to stop the increasing drug and criminal trend before it’s too late.”

Personal Responsibility

Participants supported measures that create real consequences for people involved in criminal activity. This support reflected a belief in personal accountability for criminal choices, as well as frustration with what participants saw as the growing normalization of drug trafficking in some communities.

Survey respondents emphasized accountability for illegal activities. A Hay River resident wrote, “Everyone is accountable for their own actions. You break the law; there should be consequences. Stop the blame game. Let’s get it implemented now. It will allow us to take Hay River back.” A Yellowknife resident stated, “It’s time for people who associate themselves with crime to feel the widespread impact of their choices, including to their own quality of life. I’m hopeful for a quick implementation.”

An Inuvik participant emphasized the urgency, stating, “Youth groups, kids are being victimized. We need to do something.” Another survey respondent expressed support for action, writing, “We need to implement new things to make Yellowknife a nicer place to live again.” One participant noted the normalization of criminal activity: “We must act to change the dynamic in the community. Trafficking drugs has been normalized in the recent years.”

Enforcement Support

Participants expressed support for having additional tools available to address known problem properties, though many emphasized the need for sustained commitment rather than short-term initiatives. The support reflected both urgency about current conditions and concern that effective implementation would require long-term investment and capacity-building. When asked if SCAN would reduce illegal activity in their community, a Hay River participant stated “I think this is a long game. It’s not all going to be fixed in six months’ time.”

“I’ll take any help I can get.”

Hay River Participant

A written submission supported the introduction of SCAN, sharing: “Our people face a social crisis caused by the infiltration of organized crime and drugs into our communities. Families across the NWT have lost loved ones in drug-related deaths. Leadership in many communities feel overwhelmed and unsupported by the RCMP. We strongly support the introduction of legislation to respond to these challenges.”

Theme 2: Authority, Effectiveness, and Safety

Participants raised related concerns about whether SCAN officers would have enough authority to be effective, whether eviction-based measures would actually reduce crime or simply move it elsewhere, and how people would be protected from retaliation. Together, these concerns reflected doubts about whether SCAN would meaningfully improve on current approaches, or whether it would add another layer of administration without addressing existing limits in enforcement capacity.

Authority

Participants questioned the effectiveness of SCAN officers if they do not have meaningful authority beyond what currently exists through the Rental Office. Many participants expressed that they already know where illegal activity is occurring and have attempted to act, only to encounter barriers at the rental office level. The

questions reflected skepticism about whether creating a new officer position would meaningfully improve outcomes if final decision-making authority rests with the same rental office.

In session, a Hay River participant asked, “Is the SCAN officer going to have any extra pull, sway, or authority with the Rental Office? I have 5 of these places that I could do this already. I have spoken to everyone, and it bottlenecks at the Rental Office.” Another Hay River participant stated, “It sounds like it just comes down to the Rental Office, their decision goes. SCAN needs teeth.”

Consistency and Objectiveness

Beyond questions of authority, participants expressed concern about inconsistent application of existing rules and whether SCAN would address these problems or simply replicate them. The concern centered on whether decision-making would be standardized across officers and communities, and whether eviction orders would be effectively enforced to prevent individuals from immediately returning. Participants expressed significant concern that SCAN may operate only as an additional layer of bureaucracy on top of the *Residential Tenancies Act*. If underlying issues within that framework are not addressed, such as perceived leniency or limited enforcement mechanisms, there was concern that SCAN may not achieve its intended outcomes.

In a discussion about current eviction guidelines, a Hay River participant described, “Drug dealers that get evicted then come right back. And if you do anything about it, you’re the criminal and you’re charged. There needs to be more oversight over these decisions. There has to be some teeth, otherwise its useless.”

Participants requested clear, objective criteria for when action can be taken, as well as mechanisms to address conflicts of interest or situations where existing decision-makers are unwilling to act. The questions reflected concern that without specific thresholds and independent oversight, SCAN could face the same implementation challenges as current systems. A Hay River participant asked: “It sounds like it just comes down to the rental office -- their decision goes. SCAN needs teeth. How many times does someone have to do XYZ? How many times? 2, 3, 5 etc.?” Another raised the issue, “If a Rental Officer said it’s fine (they can’t get evicted) because there is a conflict of interest (that’s our nephew) is there an appeal process to go to a different office?”

A Yellowknife participant observed, “Sometimes landlords do not want to evict tenants because they don’t care and are making money.” The response noted, “There could be situations like this and in this case, the SCAN officer could make a referral to Rental Office without the need to go through landlord.”

“There is currently this interpretation of leniency, depending on the Rental Officer. The Rental Office might say an incident is unacceptable, and we’re going to put conditions on it. We want to have defined numbers and clear guidelines for when they can evict.”

Hay River Participant

Effectiveness

Participants questioned whether SCAN would meaningfully reduce criminal activity or simply move it between properties and communities. The concerns reflected skepticism about eviction-based approaches when drug dealers are often transient, use other people's properties, and can quickly relocate operations. Several participants noted that advance notice requirements and investigation timelines may allow those engaged in illegal activity to avoid consequences while vulnerable property holders face eviction.

A Yellowknife participant shared, “You need to understand how extremely attractive drug dealers are to any community residents with whom they opt to stay temporarily, providing resources... they stay for a short amount of time, so you won't have enough time to do an investigation as they will be gone and then someone else comes in. How will you make it work then?”

A Hay River participant pointed out a practical challenge: “If I work in housing and let someone know we will enter in 24-hours, they move the drugs and the evidence out. When you tell them you're coming, they just avoid it.”

Survey respondents echoed concerns about whether SCAN addresses root causes. One wrote, “Simply removing people from a house doesn't really address the root cause of the crime, it just moves it to another location.” Another stated, “It seems like this is going to be more of a social service to help and try and guide people to services, help tell the police things they observe and not be what we need - additional hard enforcement. If it's just another layer of social supports, it's not worth it.”

Safety and Retaliation

Participants raised concerns about potential retaliation against both complainants and SCAN officers themselves, reflecting the reality that in small communities, reporting illegal activity can expose individuals and their families to threats or violence. Questions focused on what protections would exist for those who report problems and whether SCAN officers would have adequate safety measures to operate effectively.

A Hay River participant stated, “There is a massive responsibility for these officers. Huge concern of retaliation. Huge concerns for the safety of people doing that job.”

An Inuvik participant asked, “How are you going to protect people close to those committing a crime if they make a complaint?” A Yellowknife participant raised, “There may be retribution or intimidation as a result of a complaint.”

Survey respondents described specific safety concerns. An Inuvik respondent wrote, “People are afraid to speak up as they have been threatened and worry about their family members. The drug dealers make local people hold locals accountable by being enforcers using violence towards others, so no one knows who they can trust. If you do not do what you are told, then violence will come to you or your family, so you are motivated to do what is being asked of you.”

Participants also expressed concern about what equipment SCAN officers may have. A Fort Smith participant shared, “Concern about giving SCAN officers firearms.” Another Fort Smith participant asked, “Are these folks armed, in uniforms?” In session, clarity was shared that this proposed model does not include enforcement and the use of weapons, as seen in other jurisdictions.

“Why have you chosen this approach? Evidence I have read says that it displaces crime does not remove it.”

Yellowknife Participant

“If they need protection to do their work, would they partner with the RCMP?”

Fort Smith Participant

Theme 3: Concerns About Vulnerable Persons and Unintended Impacts

Participants raised serious concerns about how SCAN orders could affect vulnerable people, especially children, Elders, people with disabilities, and those living with addictions. They noted that some of these individuals may be involved in illegal activity only indirectly or under pressure from others and could be harmed by enforcement actions. Questions focused on what happens to vulnerable dependents when properties are subject to orders, where evicted individuals would go, and whether enforcement would address root causes.

Vulnerable Residents, Children, and Dependents

Participants described patterns where vulnerable residents, particularly those with addictions, financial struggles, or social isolation, are exploited by individuals engaged in drug dealing who use their properties as bases of operation. The concern was that SCAN investigations targeting properties could result in evicting the vulnerable property holder while those engaged in serious criminal activity simply move to exploit another vulnerable person elsewhere. Participants also expressed concern about collateral impacts on children, elders, and other dependents who live in properties subject to SCAN orders, reflecting tension between supporting consequences for criminal activity and protecting innocent household members who may have limited ability to influence the actions of others in their home.

A Hay River participant noted, “Drug dealers are coming in from out of the community and preying on those with addictions issues that they must house them while they are here on ‘business’, essentially taking over the units of vulnerable individuals.”

A Fort Smith participant noted, “You want to get rid of the bad guy, but you don't want collateral damage.” A Fort Smith participant asked, “A lot of these drug dealers are underage - 16, 17, 18. What happens to them?”

A Yellowknife participant asked, “Criminals move in on a family with vulnerable people and they will be impacted. It will affect people that might already be part of the criminal justice system. How is this legislation going to help them?” Another Yellowknife participant shared, “Need to recognize that similar to human-trafficking, enforcement activity impacts those being trafficked. Similarly with this legislation, it will impact vulnerable people.”

A Yellowknife participant stated, “Vulnerable people, Elders, people with disability, are being taken advantage of. How do we protect them? How will SCAN ensure they are not kicked out of their home?” The response indicated, “We want to protect young people so SCAN officers will work with social services and local government to consider their needs.”

Housing and Homelessness

Participants raised questions about what happens after eviction in a territory with severe housing shortages. This concern is grounded in the practical reality that alternative housing options are extremely limited, shelters have insufficient capacity, and eviction often leads directly to homelessness rather than relocation.

“We have concerns about marginalized people being homeless.”

Fort Smith Participant

A Fort Smith participant asked, “If someone is evicted with SCAN - where do they go?” and “How long are you evicted until you can re-apply for housing? This varies community to community.” A Yellowknife participant stated, “I do not see any evidence that this will be beneficial. It will make people homeless, and they will do drugs on the street.” Multiple survey respondents raised concerns about housing scarcity.

A Yellowknife participant stated, “We have such limited housing in the NWT so kicking a whole house out would just further add to the strain on the system and just push that family further into poverty and crime.” A survey respondent emphasized, “Limited housing and shelters. What will happen to the victims in these situations? Will these officers be working closely with social services when a child is involved? Where are the people who lose their homes due to crime going to live?”

“I’m extremely concerned that vulnerable people will become homeless due to the SCAN legislation if it is enacted.”

Yellowknife Participant

Addressing Root-Causes of Crime

Participants emphasized that enforcement measures on their own would not address the root causes of crime in communities. Many were concerned that SCAN could focus on moving criminal activity elsewhere rather than on prevention, treatment, or addressing the social and economic factors that make people vulnerable to exploitation or involvement in illegal activity.

A Yellowknife participant asked, “Enforcement on its own is not going to achieve anything. What are you going to do to work with other agencies to help young people not get involved in crime in the first place?” A Yellowknife survey respondent wrote, “The goal should be to heal the root causes of why people are involved in illegal activities. Adding additional punishments will do nothing to change a person’s life for the better.”

Survey respondents emphasized structural issues. One Yellowknife resident wrote, “The problems that I consider as caused by illegal activities are discrimination in the housing market (based on race and socioeconomic status), a lack of mental and physical health supports that leads people to engage in survival strategies.” Another stated, “The problems causing illegal activities are poverty and inequity. It’s best to deal with source problems than focus on aftereffects.”

Theme 4: Capacity, Resources, and Regional Fairness

Participants raised questions about capacity and resources for implementing SCAN across all communities in the NWT. Concerns focused on staffing levels, response times, where officers would be located, and whether smaller communities would receive equitable service.

Capacity and Staffing, and other Community Considerations

Participants questioned whether there would be enough staff and resources to implement SCAN effectively in all NWT communities, given differences in community size, property ownership, and existing enforcement presence. These concerns reflected a balance between the urgency to address community safety issues and skepticism about whether GNWT could deliver effective services outside of Yellowknife without significant investment in regional capacity.

A Hay River participant stated, “We just don’t have the resources to enforce it here.” A Norman Wells participant asked, “Will the officers be overwhelmed with complaints? How will they cope? We already know who the criminals are so they will receive a lot of complaints as

“I think it will improve the safety in our community. But we need to put the resources and capacity behind it.”

Hay River Participant

soon as they open.”

A Norman Wells participant raised, “Norman Wells is unique as there is only one small private landlord. Will SCAN need to be changed for Norman Wells to reflect unique property rights and ownership?” An Inuvik participant stated, “Every community will have their own needs, but I think we can use SCAN to work with Indigenous Government and make it work for us.”

Regional Distribution

Participants were concerned that the legislation could be implemented mainly from a Yellowknife perspective and stressed the need for fair service delivery across all regions. These concerns reflect a broader feeling among regional communities that they are often under-underserved compared to the capital, even though smaller communities face many of the same —or greater— impacts from the issues the legislation aims to address.

A Fort Smith participant shared “We're not Yellowknife. Yellowknife is 40,000. Here is 2,500.” A Fort Smith participant noted: “Where is the Rental Officer? In Yellowknife... there is no way for them to get there.” A Hay River participant suggested: “Should Rental Officers be regional? They are familiar with what is going on here.” A Yellowknife participant stated: “I don't see a lot of smaller communities in the list of engagement activity. How are you going to address the needs of these communities that are under resources and most likely to be impacted?” Another Yellowknife participant added: “It seems disingenuous to not visit smaller communities - I am struggling to see how this will benefit smaller communities.”

Timeline and Urgency

Despite questions about resources and how SCAN would be implemented, participants in several communities expressed frustration with the slow pace of legislative development and a strong desire for action now. This urgency reflected concern that long consultation processes are continuing while community safety problems are getting worse.

A Hay River participant asked: “When will legislation be pushed through?” An Inuvik participant stated: “What are you going to do tomorrow? How long is this whole thing going to take? We need legislation that changes lives.” Another Inuvik participant stated: “We are in a state of emergency with regard to drugs – you should be able to override the normal legislative process like you did during COVID.” An Inuvik participant stated simply: “Make it happen faster – too much talking.”

Theme 5: Due Process, Legal Safeguards, and Potential for Misuse

Participants raised concerns about fairness and due process, including eviction timelines, impacts on records, and the risk that the legislation could be misused. They questioned whether there would be strong enough safeguards to protect people from unfounded investigations, how anonymous complaints would be verified, and whether SCAN could be used to unfairly target vulnerable people or resolve personal disputes.

Misuse

Participants raised concerns that SCAN could be misused through false complaints, discriminatory application, or by landlords seeking to remove tenants for reasons unrelated to criminal activity. Many noted that in small communities where people know each other, reporting systems can be used to settle personal disputes or target individuals based on bias rather than real safety concerns. During engagement sessions, it was clarified that the proposed SCAN model would use a confidential, rather than anonymous, complaint process.

One Yellowknife survey respondent stated, “We have already seen widespread and increasing racism across the NWT particularly against Black people and members of the South Asian community. I have no doubt this legislation will be weaponized by members of the public against racialized people and immigrants living in the NWT.” A Fort Resolution respondent expressed, “It can be he-said-she-said situation, and then people will just be investigated for nothing, waste of resources and time, and people’s privacy. Unfounded complaints are going to be a massive issue, small communities thrive off rumors.”

Multiple respondents expressed concerns about anonymous complaints in small communities. One wrote, “I’m worried about people making false claims out of spite.” Another stated, “There should be fines for people that make false complaints.” A Fort Liard respondent asked, “Privacy. How could a person defend themselves against false/frivolous complaints?”

Several respondents raised concerns about the complaints-based system. One survey respondent wrote, “In small northern communities, where relationships, reputation, and shared spaces matter, systems built on anonymous complaints and low thresholds for action don’t strengthen safety, they undermine it. People become more guarded, more suspicious, and less willing to engage with institutions.”

Constitutional Concerns and Legality

Participants raised concerns that the SCAN legislation could conflict with constitutional protections. They pointed to legal challenges in other jurisdictions and broader concerns about fairness, privacy, and government overreach. These concerns focused on the lower standard of evidence needed to start an investigation, the complaints based process that could place people under investigation with limited proof, and the risk that SCAN could bypass safeguards found in criminal law while still leading to serious impacts, such as loss of housing.

One Yellowknife resident wrote, “This legislation is racist, unconstitutional, and will be wholly ineffective. Fund education and social services.” Another stated, “I’m concerned about the territorial government’s egregious and unconstitutional overreach.” A Fort Resolution respondent wrote, “The way it’s worded is horrible, are we becoming an authoritarian state? Police state? People can just get people in trouble. For nothing. It’s too broad, gives too much power to a housing investigator, you guys aren’t the RCMP and shouldn’t have police capabilities.”

Written submissions from the Yellowknife emphasized, “As a complaints-based system, SCAN legislation undermines the individual right to live somewhere in security, peace, and dignity. By relying on anonymous complaints to initiate an investigation, SCAN establishes a process of placing people under investigation with

“This legislation has the potential to be weaponized against vulnerable persons or minorities. I have no trust in the GNWT abilities to be fair, given the GNWT history.”

Yellowknife Resident Survey

little to no evidence of any wrongdoing; many of these investigations ultimately prove to be unsubstantiated.”

Transparency and Accountability

Participants asked for clear ways to ensure SCAN operates openly and with proper oversight, especially given concerns about misuse and the serious impacts investigations could have on individuals. They emphasized the need for public accountability through regular reporting and independent review to build and maintain trust, particularly in light of skepticism from some respondents about the government’s ability to apply the legislation fairly.

A Hay River participant suggested, “For transparency, I think it should be monthly or quarterly. I think more transparency is good.” A Yellowknife participant stated, “It would be useful for you to engage and work with communities once you have developed something practical to consult on.”

Survey respondents emphasized the need for oversight. One wrote, “Investigations by SCAN officers will have to be demonstrably thorough, impartial, and fair. Regular, public reporting on the outcomes of the legislation should be included for transparency and accountability.” Another stated, “I am concerned that allowing the SCAN Office to initiate its own investigations could result in perceptions of bias.”

Survey Results

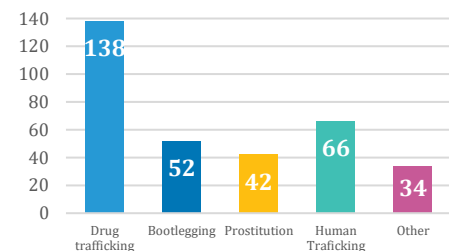
The SCAN survey included 13 questions designed to gather perspectives on the proposed legislation. For most questions, participants were provided with a range of potential answers and asked to select the option that best matched their views. Several questions allowed participants to select multiple responses where applicable, and open-ended questions provided opportunities for participants to add additional comments or context.

GNWT received a total of 156 responses for this survey.

This section provides a detailed analysis of 6 out of 13 questions in the SCAN survey which lend themselves to statistical analysis. The remaining 6 questions enabled participants to provide detailed thoughts and comments in text form. Those results have been analyzed together with comments received through the other engagement channels and included in the major themes summary in the previous section.

Question 1: Which illegal activities are you most worried about in your community?

Drug trafficking was by far the most significant concern among survey respondents (138 responses), followed by human trafficking (66), bootlegging (50), prostitution (42), and other activities (34).

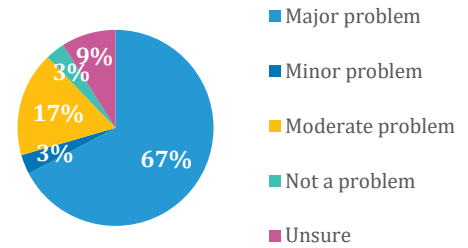


Source: NWT Survey, Question 2.

Question 2: Are these types of issues with residential properties a problem in your community?

The overwhelming majority of survey respondents (67%) identified illegal activities at residential properties as a major problem in their community, with an additional 17% viewing it as a moderate problem.

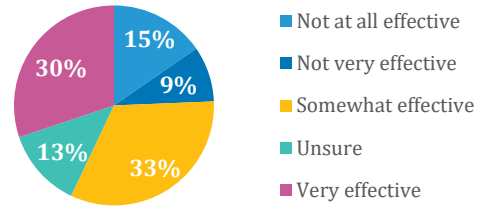
9% commented that they were unsure and only 3% stated that they did not think these were problems in their community.



Source: NWT Survey, Question 2.

Question 3: Do you think the proposed legislation will have an effect in improving safety in your community?

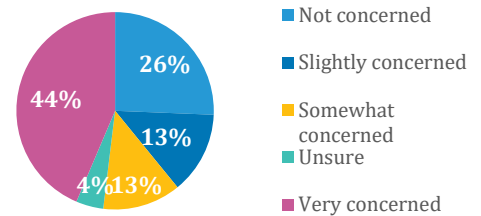
Survey respondents were divided on whether SCAN legislation would improve community safety, with roughly equal proportions believing it would be very effective, somewhat effective, not very effective, or not at all effective.



Source: NWT Survey, Question 3.

Question 4: How concerned are you about the potential impact of orders on vulnerable people (e.g., children, elders, persons with disabilities, people struggling with addictions or other dependents)?

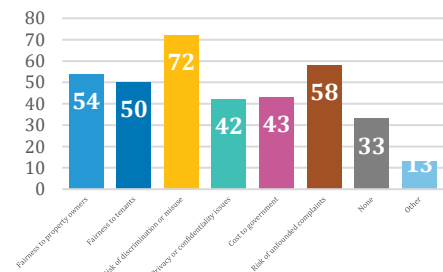
Survey respondents expressed significant concern about impacts on vulnerable persons, with the largest portions indicating they were either very concerned or fairly concerned about how enforcement orders would affect children, elders, persons with disabilities, and people struggling with addictions.



Source: NWT Survey, Question 4.

Question 5: SCAN Legislation will address issues with residential properties that are regularly being used for illegal activity such as drug trafficking, prostitution, bootlegging, etc. Which illegal activities are you most worried about in your community? (Please select all that apply)

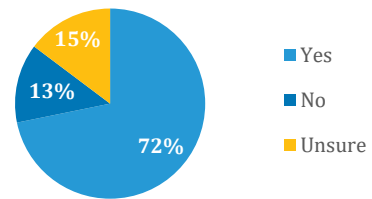
Survey respondents' top concerns about SCAN legislation included risk of discrimination or misuse (72 responses), risk of unfounded complaints (58), fairness to property owners (54), fairness to tenants (50), cost to government (43), and privacy or confidentiality issues (42).



Source: NWT Survey, Question 5.

Question 6: SCAN Legislation will address issues with residential properties that are regularly being used for illegal activity such as drug trafficking, prostitution, bootlegging, etc. Which illegal activities are you most worried about in your community? (Please select all that apply)

Most survey respondents (72%) supported SCAN officers having authority to initiate investigations on their own initiative in addition to responding to complaints, with 13% opposed and 15% unsure.



Source: NWT Survey, Question 6.

Comparative Perspectives: Civil Forfeiture and SCAN

While both pieces of proposed legislation address community safety concerns and share the goal of disrupting criminal activity, the feedback received revealed notably different levels of support and concern between Civil Forfeiture and SCAN.

Civil Forfeiture

Civil Forfeiture received broad support across engagement activities, with many participants strongly agreeing that taking profits away from crime is the right approach. While participants raised concerns—especially about due process, impacts on vulnerable people, and the need for transparency—these were generally seen as implementation issues rather than outright opposition. Written submissions from Indigenous Governments and business organizations showed strong support, and most survey respondents believed that removing profits and tools of crime would help deter criminal activity. Support was conditional on having strong safeguards in place, easy access to legal protections, and clear, transparent rules for how forfeited funds would be used.

SCAN

Feedback on SCAN was more divided and raised deeper concerns about whether the approach would work in practice. While participants consistently expressed frustration with problem properties and supported having more tools to address them, many questioned whether SCAN would achieve its intended goals.

Key concerns focused on whether:

- SCAN would target criminal activity or instead mainly displace vulnerable residents;
- SCAN officers would have real authority beyond existing Rental Office processes; and
- The legislation could be applied without causing serious harm to innocent dependents, especially given severe housing shortages in many communities.

Written submissions showed strong polarization. Social service organizations and housing advocates strongly opposed SCAN, while some Indigenous Governments and business groups expressed strong support. Survey respondents were evenly split on whether SCAN would be effective, even though most agreed that problem properties are a serious concern.

Participants often distinguished SCAN from Civil Forfeiture. Civil Forfeiture happens after criminal activity has occurred and includes court oversight and established legal protections. In contrast, SCAN involves ongoing investigation of homes and the possible displacement of residents, which raised stronger concerns

about unintended harm, especially for vulnerable people who may have limited control over others' actions in their household.

Regional Variations in Feedback

While common themes emerged across all engagement sessions, notable differences in emphasis and tone were evident across different communities.

Yellowknife

Yellowknife sessions and submissions reflected the greatest diversity of perspectives. The capital hosted participants from social service organizations, advocacy groups, and individuals with professional expertise in housing, law, and social services. Yellowknife respondents provided the most detailed critiques of both pieces of legislation, raised the most questions about constitutional concerns and due process, and expressed the strongest concerns about potential for discriminatory application. At the same time, Yellowknife participants also included strong voices supporting both pieces of legislation as necessary responses to visible criminal activity affecting the city.

Hay River

Hay River participants expressed particularly strong support for both pieces of legislation, with emphasis on tangible, immediate action. Hay River feedback focused heavily on specific problem properties and individuals known to be involved in drug trafficking, with participants describing direct impacts on their neighbourhoods and expressing urgency about implementation. Questions in Hay River centered more on operational details, how quickly the legislation could be implemented, where officers would be located, and whether capacity would exist to address known problems, rather than on fundamental concerns about the approach.

Fort Smith

Fort Smith participants raised specific concerns about regional equity and capacity, questioning whether resources and positions would be concentrated in Yellowknife while regional communities experience the same or greater impacts from criminal activity. Fort Smith feedback emphasized the importance of local knowledge and presence, with skepticism about whether Yellowknife-based staff could effectively serve smaller communities. Safety and retaliation concerns were particularly prominent in Fort Smith discussions, reflecting the reality that in smaller communities where everyone knows each other, reporting criminal activity carries different risks than in larger centers.

Norman Wells

Norman Wells participants noted that their community has a different housing context than many other NWT communities. Most residents own their own homes rather than rent, which raised questions about how SCAN legislation, which is designed primarily to address problem rental properties, would be relevant or effective in their community. Norman Wells participants also emphasized the geographic isolation of the community and questioned whether territorial programs could deliver effective service to remote locations. While these considerations are not exclusive to Norman Wells, it is a significant concern for their community.

Inuvik

Inuvik participants expressed the greatest sense of urgency and crisis regarding drug-related crime, with multiple participants describing their community as being in a "state of emergency" regarding drugs. Inuvik feedback included strong support for any tools that might address the problem, coupled with frustration

about the pace of legislative development and implementation. Questions about timeline dominated Inuvik discussions, with participants asking what could be done immediately rather than after lengthy legislative processes. At the same time, Inuvik participants raised concerns about impacts on vulnerable community members and emphasized the need for legislation to work in partnership with Indigenous Governments rather than being imposed from Yellowknife.

Implications

These regional and stakeholder differences suggest that implementation of either piece of legislation would require consideration of community-specific contexts, local capacity and infrastructure, and meaningful partnership with Indigenous Governments and community organizations. The variation in perspectives also emphasizes that there is no single “community view” on these proposals. Diverse perspectives exist both within and across communities, shaped by local experiences, professional expertise, and individual values regarding the appropriate balance between enforcement and support for vulnerable persons.

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