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the public health units
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Health Promotion
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Ontario Association of
Public Health Dentistry

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Public Health Nursing
Leaders

Ontario Dietitians in
Public Health

July 27, 2018

Hon. Christine Elliott
Minister of Health and Long-Term Care
10th Flr, 80 Grosvenor St,
Toronto, ON M7A 2C4

Dear Minister Elliott,

Re: Supervised Consumption Facilities (SCF)

On behalf of the Association of Local Public Health Agencies (alPHa) and its member Medical Officers of Health, Boards of Health and Affiliate organizations, we are writing today to express our support for supervised consumption facilities (SCFs) in Ontario.

Having spent considerable time reviewing the research evidence in this matter, we and many others have found it clear: these sites save lives. What is more, when they are well integrated with other services, they can be a crucial route into the system, connecting people with badly needed supports such as addiction treatment, housing, mental health counselling, and employment.

A comprehensive drug strategy includes investment in addictions treatment, police enforcement, and prevention programming that builds strong individuals, families, and communities to resist drug use. Harm reduction is however a crucial pillar of any such strategy, in part because people cannot enter treatment programs if they die of overdose.

Drug use is a public health issue throughout Ontario for a variety of reasons. In addition to the current overdose crisis, people who inject drugs are at significant risk of acquiring and transmitting infectious blood-borne diseases such as HIV and hepatitis C. Preventive harm reduction interventions such as needle distribution programs, SCFs, and educational outreach not only minimize blood-borne illness in people who are unable or unwilling to stop injecting intravenous drugs, but also form part of a comprehensive continuum of preventive and therapeutic population health and clinical services for individuals with substance use issues.

Peer-reviewed research has clearly demonstrated that SCFs can achieve the following public health, individual health, and public safety outcomes:

- reduction in overdose deaths
- reduction of behaviours that cause HIV and hepatitis C infection, such as the sharing of previously used needles
- reduction of unsafe injection practices
- increased acceptance of detox and addiction treatment services
- reductions in costs to rest of health care system
- reduction of public drug use
- reduction in publicly discarded injection equipment and
- engagement of injection drug users, including high-risk individuals, with support services.

In addition to the many health organizations that have issued position papers in support of these sites (Canadian Medical Association, Public Health Physicians of Canada,

Canadian Nurses Association, Registered Nurses of Ontario, Centre for Addiction and Mental Health etc.), the Supreme Court of Canada, in a unanimous 2011 ruling, declared that closure of Vancouver's InSite (a SCF now in its 16th year of operation) would constitute a denial of health services as well as deprivation of life and security of the person, and would fit with neither the principles of fundamental justice, nor the maintenance and promotion of public health and safety that is a core purpose of the Controlled Drugs and Substances Act.

In summary, we are committed to a comprehensive, evidence-based approach to preventing the poor health outcomes and premature death associated with substance use disorders. This must include harm reduction initiatives such as SCFs and their acknowledgement as an important part of the continuum of Ontario's health care services.

We would be pleased to meet with you to discuss this issue further and look forward to participating in any consultations that may arise from your review. Please contact alPHa Executive Director Loretta Ryan (loretta@alphaweb.org; 416-595-0006 extension 22).

Yours sincerely,



Dr. Robert Kyle,
alPHa President



Dr. Chris Mackie,
Chair, Council of Ontario Medical
Officers of Health (COMOH)



Trudy Sachowski,
Chair, Boards of Health Section

COPY: Hon. Doug Ford, Premier of Ontario
Helen Angus, Deputy Minister, Health and Long-Term Care
Dr. David Williams, Chief Medical Officer of Health
Roselle Martino, Assistant Deputy Minister, Population and Public Health Division (Health and Long-Term Care)