

alPHA's members are
the public health units
in Ontario.

alPHA Sections:

Boards of Health
Section

Council of Ontario
Medical Officers of
Health (COMOH)

**Affiliate
Organizations:**

Association of Ontario
Public Health Business
Administrators

Association of
Public Health
Epidemiologists
in Ontario

Association of
Supervisors of Public
Health Inspectors of
Ontario

Health Promotion
Ontario

Ontario Association of
Public Health Dentistry

Ontario Association of
Public Health Nursing
Leaders

Ontario Dietitians in
Public Health

February 19, 2020

Hon. Doug Ford
Premier of Ontario
Legislative Bldg Rm 281, Queen's Park,
Toronto, ON M7A 1A1

Dear Premier Ford,

Re: Keeping Ontario Safe and Open

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 to provide our comments on the recent decision to begin easing the recent province-wide shutdown and stay-at-home orders in context of the rapid emergence of COVID-19 Variants of Concern (VOCs).

We too have been encouraged by the downward trend in daily case counts in recent weeks, but the rapidly increasing proportion of the highly contagious VOCs within these counts is deeply troubling. Our members, who are on the front lines of the public health response to the COVID-19 pandemic in Ontario, therefore have serious concerns about the increased mobility, more frequent interpersonal contacts, and consequent potential exposures to COVID-19 that will accompany a return to the progressive categories under the Response Framework at this time.

We certainly appreciate the need to support the recovery of our economy, being fully aware of its role as a key driver of so many of the determinants of physical and mental health. On balance however, we believe that the timing of loosening the restrictions and the degree to which they have been relaxed in many areas underestimates the imminent and considerable threat posed by the VOCs. Experience in other jurisdictions has demonstrated that decisive and early action prevents later prolonged shutdowns, which in turn contributes to faster economic recovery.

According to Public Health Ontario, data are clear that the prevalence of the B.1.1.7 variant is increasing rapidly enough that it is expected to be the dominant one in Ontario within the next month¹. This variant is known to be significantly more contagious, may cause more severe illness and may be more resistant to certain vaccines. Based on these factors as well as the lived experience in other jurisdictions, Public Health Ontario has also stated that it is equally clear that public health measures need to be intensified to minimize the spread of COVID-19 VOCs in Ontario².

While we acknowledge the creation of the "emergency brake" provision that allows the local medical officer of health to request the reimposition of restrictions if their public health unit experiences rapid acceleration in COVID-19 transmission or if its health care system risks becoming overwhelmed, any decision to use this provision is a reactive one and thus would almost certainly be too late to have a meaningful effect. This assumption is supported by the failure of similar mechanisms in England, Ireland, and Denmark, each of which was compelled to re-implement strict, nation-wide lockdowns to minimize mobility and bring the spread of VOCs under control³.

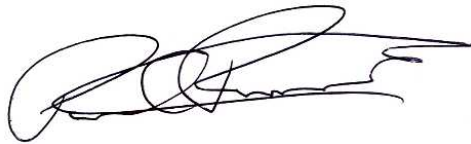
We believe it is not too late to alter the course towards a more gradual easing of restrictions, allowing time to monitor how the trends respond and adjust accordingly to keep transmission rates low. Accordingly, we support our MOH members who have requested a delay in their PHU Regions returning to the COVID-19 Response Framework and for the Stay-at-Home Orders to continue in their health units for the time being. Moreover, a slower approach would also allow for the development of clear public messaging that reinforces the undiminished seriousness of the pandemic in Ontario while continuing to offer reasons for hope and optimism until vaccines are widely available.

Our members, as Ontario's pre-eminent public health experts, are more than willing to provide further advice and input, particularly with regards to the VOCs and ensuring that Ontario's COVID-19 Response Framework remains robust and that its public health goals and objectives can be achieved. We look forward to an invitation to discuss this with you further. To schedule a meeting, please have your staff contact Loretta Ryan, Executive Director, alPHA, at loretta@alphaweb.org or 416-595-0006 x 222.

Yours sincerely,



Carmen McGregor,
alPHA President



Dr. Paul Roumeliotis,
Chair, Council of Ontario Medical
Officers of Health (COMOH)



Trudy Sachowski,
Chair, Boards of Health
Section

COPY: Hon. Christine Elliott, Minister of Health
Dr. David Williams, Chief Medical Officer of Health
Alison Blair, Associate Deputy Minister, Pandemic Response and Recovery

The Association of Local Public Health Agencies (alPHA) is a not-for-profit organization that provides leadership to the boards of health and public health units in Ontario. alPHA advises and lends expertise to members on the governance, administration and management of health units. The Association also collaborates with governments and other health organizations, advocating for a strong, effective and efficient public health system in the province. Through policy analysis, discussion, collaboration, and advocacy, alPHA's members and staff act to promote public health policies that form a strong foundation for the improvement of health promotion and protection, disease prevention and surveillance services in all of Ontario's communities.