

November 11, 2013

The Honourable Rona Ambrose, MP
Minister of Health
House of Commons
Ottawa, ON
K1A 0A6

Dear Minister,

I am writing in regards to Bill C-2, an act to amend the Controlled Drugs and Substances Act ('Respect for Communities Act'), which outlines the conditions required for an exemption to operate a Supervised Consumption Site (SCS).

Injection drug use is a very serious individual and public health concern. It is associated with high rates of HIV, Hepatitis C and other blood-borne infections. Injection drug users are also at risk of overdose, infections, suicide, and a host of social problems. While addiction treatment is one means to address these problems, not all individuals are ready or able to stop injecting drugs. That is why the Centre for Addiction and Mental Health (CAMH) recognizes that SCS are an important part of a public health approach that can reduce the harms associated with injection drug use. Evaluations of these services from around the world have demonstrated the health benefits to injection drug users without compromising the safety of the surrounding community.

CAMH appreciates that SCS must operate under strict rules and regulations. We also agree that it is important for communities to be consulted as part of the process to develop any SCS. However, we are concerned that the conditions for receiving an exemption under Bill C-2 are unnecessarily restrictive and could prevent the development of these life-saving health services. Bill C-2 would benefit from amendments that would mitigate what we believe are excessive barriers to the establishment of SCS.

CAMH supports Canada's comprehensive drug strategy with its focus on prevention, treatment and enforcement. We also believe that components of a public health approach such as SCS, have a place in our health care system. I would appreciate the opportunity to discuss Bill C-2 with you in more detail.

Sincerely,



Catherine Zahn, MD, FRCPC(C)
President and CEO