

Submission to the Board of Health: Toronto Overdose Action Plan

HL18.3 (March 20, 2017)

As Toronto struggles with an epidemic of opioid addiction and overdose deaths, action from all levels of government will be needed. The Centre for Addiction and Mental Health (CAMH) welcomes the development and introduction of the Toronto Overdose Action Plan.

In October 2016, following a review of the evidence and of policies implemented elsewhere, we released a Prescription Opioid Policy Framework, which offers recommendations for a comprehensive response to Ontario's opioid crisis.¹ It provides strong support for several of the recommendations in the Action Plan, notably the call for:

- scaled-up, low-threshold harm reduction services, including naloxone, needle exchange services, supervised consumption sites, drug checking programs and Good Samaritan legislation;
- a flexible treatment system that can accommodate different severities of opioid use disorder, offering the full range of psychosocial and opioid agonist maintenance therapies (including heroin-assisted treatment when appropriate)² and allowing patients to move between treatment "levels" (e.g. from higher-intensity treatment to lower) as appropriate.

At the same time, we would like to advise caution about Recommendation 7 (pharmaceutical drug access). This crisis of addiction and overdose has its roots in the medical system, and solving it will necessarily require reducing the availability of prescription opioids by restricting them to evidence-supported instances and practices.³ A public health response will involve these prevention measures as well the safeguards described above – accessible evidence-based opioid use disorder treatment and scaled-up harm reduction services.

Finally, we wish to reinforce the importance of Recommendation 10 (a public health approach to drug policy). Despite recent changes to Canada's national drug strategy, in practice the current approach to illegal drugs is to treat it primarily as a criminal justice issue. Problematic substance use is a health issue and should be addressed as such. A public health approach uses evidence-informed policies to reduce the burden of injury, disease and disability; it also addresses the underlying determinants of health⁴ (as per Recommendation 9 of the Action Plan). The more Canada can shift its approach to addiction to the public health sphere, the better our chances of reducing harm.⁵ We strongly endorse this recommendation for a community dialogue about what, concretely, a public health approach to drug policy could look like in Canada – and that this dialogue include current and past drug users.

For more information, please contact:

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camh The Centre for Addiction and Mental Health (CAMH) is Canada's largest mental health and addiction teaching hospital and one of the world's leading research centres in this field. CAMH is committed to playing a leading role in transforming society's understanding of mental illness and substance use and building a better health care system. To help achieve these goals, CAMH communicates evidence-informed policy advice to stakeholders and policymakers.

¹ Centre for Addiction and Mental Health (2016). *Prescription Opioid Policy Framework*. Toronto: CAMH.

² Centre for Addiction and Mental Health (2016). Submission to Health Canada re. proposed regulations relating to access to diacetylmorphine for emergency treatment. Available at https://www.camh.ca/en/hospital/about_camh/influencing_public_policy/Documents/HAT_consultation_CAMH_response_to_HC.pdf

³ Centre for Addiction and Mental Health (2016). *Prescription Opioid Policy Framework*. Toronto: CAMH.

⁴ Canadian Public Health Association (2014). *A new approach to managing illegal psychoactive substances in Canada*. CPHA Position Paper. Ottawa: CPHA.

⁵ See <http://www.alicerap.eu>.