

Two attachments are included with this submission.

December 5, 2024

Re: Council Agenda Item 4.1 (Impact from Closure of Guelph Consumption and Treatment Services Site - 2024-407)

Mayor Guthrie, Members of Council,

Attached for your information in advance of your December 11 Council meeting is a value for money request made by the Drug Strategy Network of Ontario to the Office of the Auditor General of Ontario on December 4, 2025.

The Network is disappointed that the Provincial government has placed prohibitions on municipalities via Schedule 4 of Bill 223, and intends to eliminate supervised consumption services - a proven intervention - from the Ontario landscape in the midst of what is, by any metric, a raging public health emergency of historical proportions.

Given the government has conducted no cost-benefit analyses, has chosen to dismiss expert advice provided by internal analysts and legal counsel warning of egregious harms including deaths, disregarded decades of independent peer-reviewed evaluations of consumption services, and has no risk mitigation plan, the DSNO is requesting the value for money audit. Supervised consumption services are, financially, a net benefit to taxpayers. The proposed HART hubs are no substitute for consumption and treatment service (CTS) sites.

We hope you find the information helpful in your deliberations following motions from the Regional Municipality of Waterloo Council, Hamilton City Council, and the City of Kitchener Council urging the province to re-consider eliminating consumption services.

If the Network can be of any assistance, please do not hesitate to contact us.

Sincerely,

Michael Parkinson,

Director,

Drug Strategy Network of Ontario

ontariodrugstrategies@gmail.com

About the DSNO

Established in 2008, the Drug Strategy of Ontario (DSNO) is an extensive, multi-sectoral network of municipal and First Nations drug strategies grounded in a 4-pillar approach with efforts in prevention, treatment, harm reduction, and enforcement-justice systems. Members of the Network have experience and expertise in evidence-informed initiatives preventing and/or reducing the harms that can arise from consuming regulated and/or unregulated substances. Unique in North America, the DSNO stretches across the urban, rural, and remote regions of Ontario.

www.drugstrategy.ca

@DrugStrategies

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December 4th 2024

Office of the Auditor General of Ontario,

The Drug Strategy Network of Ontario (DSNO) is an extensive, multi-sectoral network representing more than 40 municipal and First Nations drug strategies with four intersecting areas of focus: prevention, treatment, harm reduction, and community safety. As a provincial network, we are requesting a value-for-money audit related to Consumption and Treatment Services (CTS) across the province.

On August 20th, 2024 the Provincial Government announced closures of 10 CTS sites across the province, effective March 31st 2025. Bill 223 Schedule 4 that contains the prohibitions on CTS sites passed 3rd reading on December 2, 2024 with limited debate and no Committee hearings. These health services provide low barrier, life-saving care during Ontario's ongoing drug poisoning tragedy. This includes supervised injection services, wound care, drug checking services, distribution of harm reduction supplies, onsite health care and education, and more than 502,745 referrals from Ontario's consumption sites to addiction treatment and other services.¹

Unregulated substances are increasingly toxic and unpredictable, and the harms adversely impact both individual and community health and safety. An Ontario resident dies from drug poisoning every 2.5 hours. CTS are an essential, evidence-based health care intervention that is effective at minimizing harms, including death, in communities across Ontario. A wide range of local and international evidence demonstrates CTS facilities reduce overdose-related risks, promote safer drug use practices, and support people's access to treatment and other health services.^{2 3}

In addition to health-focused evidence, research also indicates that these services reduce healthcare costs. A cost analysis conducted at Calgary's Safeworks Program found that 98% of overdoses were managed on-site. Over the program's duration, this resulted in total cost savings of over \$2.3 million by reducing the need for emergency department and ambulance services.⁴ Additionally, supervised consumption practices reduce the risk of HIV, Hep C transmission, significantly reducing overall costs on the healthcare system.^{5 6}

We note that Ontario's own reviews of supervised consumption services did not recommend shutting down any sites. Indeed, internal advice to the government from staff and counsel indicated:

“There is a high risk that reducing access to harm reduction and overdose support services will result in increased emergency department visits, health impacts, overdose and death⁷.”

¹ <https://health-infobase.canada.ca/supervised-consumption-sites/>

² Government of Canada Data blog: Canadian Supervised Consumption Site Statistics. Available from: <https://health-infobase.canada.ca/datalab/supervised-consumption-sites-blog.html>. and <https://health-infobase.canada.ca/supervised-consumption-sites/>

³ Harm Reduction International. (2020) Making the Investment Case: Cost Effectiveness of Harm Reduction. Available from: https://hri.global/wp-content/uploads/2020/04/COST_EFFECTIVENESS_BRIEFING-APRIL-2020-ENG.pdf

⁴ Khair, S., Eastwood, C.A., Lu, M. (2022) Supervised consumption site enables cost savings by avoiding emergency services: a cost analysis study. *Harm Reduction*. Available from: <https://doi.org/10.1186/s12954-022-00609-5>

⁵ Jozaghi E, Reid AA, Andresen MA. (2013) A cost-benefit/cost-effectiveness analysis of proposed supervised injection facilities in Montreal, Canada.

⁶ Bayoumi AM, Zaric GS. (2008) The cost-effectiveness of Vancouver's supervised injection facility.

⁷ D'Mello, C., Callan, I. (2024) Hospitalizations and death: Ontario's internal warnings over supervised consumption site ban. Retrieved December 2, 2024 from: <https://globalnews.ca/news/10868065/ontario-supervised-consumption-site-internal-warnings/>



On December 3, the Office of the Auditor General of Ontario's 2024 Annual Report⁸ noted:

"... we found that the proposed changes to harm-reduction services were decided upon without proper planning, comprehensive impact or risk analysis, or public consultations."

Citing internal documents about the risk of harms, the Auditor General wrote that the Ministry has not developed plans to mitigate the risks prior to making the decision, including "the financial and operational burden on emergency departments", recommending the Ministry perform impact, risk and financial analysis" before transitioning to the new HART hubs

Additionally, supervised consumption services are supported by a wide range of stakeholders, including but not limited to the Chief Medical Officer of Health of Ontario, the Ontario Association of Chiefs of Police, the Registered Nurses Association of Ontario, the Association of Family Health Teams, the Association of Municipalities of Ontario, the Canadian Mental Health Association, among many others.

The province of Ontario is in the midst of a public health emergency of historical proportions. The Drug Strategy Network of Ontario urges a fulsome audit, including the cost effectiveness of Ontario's CTS sites, given the expected rise in financial costs and the immediate danger to both individual and public health and safety once the CTS sites are closed.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Parkinson", with a horizontal line extending to the right.

Michael Parkinson, Director
Drug Strategy Network of Ontario
Ontariodrugstrategies@Gmail.Com

cc:

Hon. Sylvia Jones – Minister of Health
Hon. Michael Tibollo – Associate Minister of Mental Health and Addictions
Mike Schreiner – Green Party of Ontario
Marit Stiles – New Democratic Party of Ontario
Bonnie Crombie – Ontario Liberal Party
Dr. Kieran Moore – Chief Medical Officer of Health in Ontario

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⁸ Office of the Auditor General of Ontario. Annual Report 2024: Performance Audit - Implementation and Oversight of Ontario's Opioid Strategy. Retrieved December 3, 2024 from: <https://globalnews.ca/news/10868065/ontario-supervised-consumption-site-internal-warnings/>