

To: Major John Tory and ALL City Councillors  
Date: July 10 2016

**RE: 'Supervised injection site' at the Queen West Community Health Centre**

We are speaking on behalf of group a of over 100 local residents from across Toronto Wards 19 and 20 who are concerned about the proposal to open a 'supervised injection site' in the Queen West Community Health Centre, given its close proximity to an elementary school (St. Mary Catholic School).

We call upon our elected representatives to halt the approval process until such time as open, transparent and meaningful dialogue can occur that is inclusive of a broad range of stakeholders in the local community and focused on finding the best location and mode of delivery for an injection site in our neighbourhood.

Our reasons are the following:

- our greatest concern is the lack of discussion or focus on the impact that a supervised injection site could have on young children (the youngest who are 4 years old) and the lack of consideration of alternative options that pose less risk of harm to individual injection drug users and to neighbourhoods
- the lack of due process according to the protocol outlined in the *Toronto Drug Strategy* (2005, Recommendation 65 as amended and approved by City Council) as well as recommendations outlined in reports (*TOSCA* and *Toronto Residents Reference Panel*), and the Supreme Court Ruling of 2011.
- failure to present all evidence impartially (both positive and negative) and the dissemination of misleading, biased or inaccurate information in public presentations, meetings and pamphlets to manufacture consent
- the perfunctory and rushed local 'public consultation.'

Very little attention has been paid to the fact that the Queen West Community Centre is located directly across from an elementary school. For example, as far as we can see the proximity to the school was left out of all communication from Councillors Cressy and Mike Layton and media coverage which is mostly a restatement of comments by these two councilors or Toronto Public Health. Social justice entails special consideration of vulnerable groups, including children and youth. The proposed location so close to an elementary school is inappropriate due to the risk to children of inadvertent contact with drug paraphernalia, or drug-related activity and violence. While not all injection drug users engage in crime, and they themselves can be victims of crime, few would deny that addiction to hardcore street drugs is associated with criminal activity.

In addition, we do not believe that young children who attend elementary school have the cognitive capacity to deal with what they may see being so close to the injection site. As parents of children in this neighbourhood, many of us have seen our children negatively impacted by individuals involved in drug use and dealing.

Children and youth are a vulnerable group that warrants special consideration and protections by administrative bodies.

There are zoning bylaws that would prevent an adult entertainment establishment such as a strip club or a marijuana production facility from being opened at the site of Queen West Health Centre due to its close proximity to St Mary's Elementary school. Why then is it acceptable to have an injection site at the location? In addition, proponents of supervised injection sites refer to these sites operating successfully in Vancouver and around the world. However, are any of these sites so close to a school? Is this not something that should be studied in-depth?

It is incumbent on City Council to abide by the protocol set out in the *Toronto Drug Strategy* (2005<sup>1</sup>) under Recommendation 65 and Amendment (p. 59-60), as approved by Council. This states in part:

Further, that City Council reaffirm that no consumption sites will be established unless the protocol is followed, which requires that federal, provincial, municipal and police approval be given prior to the establishment of such a facility, and during the feasibility study, the issue of **neighbourhood impacts** be **specifically addressed**, the ward Councillors be surveyed for residential groups that would be interested, and staff seek the **input of those residential groups** on this matter **prior to the completion of the feasibility study**. (p. 60, bold added)

We do not believe that the City's protocol has been followed, both in letter and in spirit.

For example, there are a number of households that are non-English speaking, working class, or occupied by elders who are not hooked into social media networks. Many people did not receive hardcopy notices about any 'public consultation' meeting. These groups have been excluded altogether. The tactic of using the pejorative label of NIMBY to impute self-interest has had the effect of silencing people who wish to engage in a healthy and open debate on the issue. Entirely excluded from the debate is the Toronto Police perspective. Through a spokesperson, Toronto Police Chief Mark Saunders is on record stating that such sites "cause enormous damage to neighbourhoods."<sup>2</sup> He just recently came out in support of supervised injection sites but has never said what led to his dramatic change in position or addressed what the police will do to ensure public safety including children at St Mary's school.

It is imprudent for the City to proceed with passing this motion PRIOR to a thorough and transparent examination of the risks to public safety and potential negative impacts on the neighbourhood. This is in line with the Supreme Court ruling (2011<sup>3</sup>), which stressed the importance of balancing public health and *public safety*. We do not believe that the June 16, 2016 report by the Medical Officer of Health (which in fact was produced four days before the second community consultation

on June 20<sup>th</sup>) has adequately focused on public safety, especially concerning the Queen West Community Health Centre location.

The proposal and the rushed approval consultation process to locate the supervised injection site in our neighbourhood has been done with the assumption that Queen West Community Health Centre is the only location available. We wonder why there has been no discussion of other locations such as hospitals or the use of a mobile drug consumption facilities that currently exist in Barcelona and Berlin.

As residents who will be directly impacted by the location of the supervised injection site in our neighbourhood, we were disappointed that there was no open discussion or debate on the possible negative impacts of this site. Our group was formed because of it and we took it up the task of what should have been the job of the two councilors and Toronto Public Health, to ensure our fellow residents receive a balanced picture of this issue. Our submission to the Toronto Board of Health for the meeting on July 4 2016 outlines our analysis of the biased evidence presented to the public and packaged for the media. It documents the flawed democratic process based on our collective frustration with the so-called 'public consultation' process. For more detail please refer to our submission at:  
<http://www.toronto.ca/legdocs/mmis/2016/hl/comm/communicationfile-61849.pdf>.

As local residents, we urge the Mayor and Councillors to carefully consider how participatory democracy and 'evidence-based policy' ought to operate in a democratic society. While other ward Councillors may feel relieved that their wards escaped selection in this first round, SIS advocates are on record stating the intention to open more sites across the City of Toronto. We ask all Councillors to carefully consider whether, and under what conditions, they would agree to a 'supervised injection site' in their own ward as this decision will set the precedence for any expansion into other areas of the City.

In voting in favour of implementing the supervised injection site at the Queen West Community Health Centre, the Mayor and Councillors are saying that it is acceptable to have a supervised injection site so close to a school without genuine broad-based community consultation or study into more appropriate locations or modes of delivery.

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*Queen West Residents for Safe & Caring Communities*

## APPENDIX A

City of Toronto (2005). *Toronto Drug Strategy: A Comprehensive Approach to Alcohol and Other Drugs*. Recommendation 65 and Amendment states on pp. 59-60:

**Recommendation 65** The City of Toronto conduct a needs assessment and feasibility study for supervised consumption sites taking into account the decentralized nature of drug use in Toronto.

***Amendment of City Council to Recommendation 65:***

*And, that such a study include information on the effects of drug use in Toronto on:*

- neighbourhoods and communities, including proximity to schools where young people congregate*
- commercial and industrial businesses*
- crime patterns in geographic areas, and*
- property values in surrounding areas.*

*Further, that City Council reaffirm that no consumption sites will be established unless the protocol is followed, which requires that federal, provincial, municipal and police approval be given prior to the establishment of such a facility, and during the feasibility study, the issue of neighbourhood impacts be specifically addressed, the ward Councillors be surveyed for residential groups that would be interested, and staff seek the input of those residential groups on this matter prior to the completion of the feasibility study.*

*Further, that an assessment of the operation of a supervised consumption site, such as the Vancouver facility, be conducted on site by a team comprised of representation from the Toronto Police Service, City Council and City staff. And, that an in-depth examination be done of the Mobile Safe-Use Unit program in service in Berlin.*

## APPENDIX B

Some comments from local residents:

"I live very close to this site and I have a toddler and am pregnant with a second child. I am outraged by the blatant prioritizing of the drug users over the safety and security of the children living and going to school in the immediate vicinity of this site. There has been no research at all into finding an alternative site that is removed from large populations of children. "

"Unlike other signatories in other petitions on the subject of SIS, I actually live in this area. The politicized process of pushing an SIS in our area has not considered the safety of our children. Additionally, the science underlying the decision for a number of injection sites is based on a model of blood-borne virus impact which has no correlation to SIS's and uses outdated information. I am highly concerned about the bullying by our politicians and activist supporters in our area which do not take into consideration the families that live in this neighbourhood. I believe that we should provide more funding for mental health services for the injection drug users and not attract more illicit drug use to our area via an SIS."

"i feel the due process was much too fast for both the communities 4wd19 & 4wd20....the site in this location is directly across the street from St. Mary's Catholic School ... we need especially more time instead of only April- July 4 more community consultations + inputs from the most vulnerable + meek in our safe + green communities. "

"I am a Queen West resident and my son gets off the streetcar every day at Bathurst and Queen to walk home. I am really worried about letting him walk alone ( he is 12 and in grade 7) as we were informed that the people will be able to go as soon as they have taken the drugs. Queen West is a busy shopping, tourist and residential area and it is ridiculous to put a site in a location like this.

The drugs are illegal and what is this showing our children! It's ok to take them when supervised! I don't think so. Money would be better spent in building proper rehab facilities to help these people with access to work and healthcare. I think that this if it's allowed to go ahead will be a huge mistake. As soon as something bad happens the city could be sued! "

"2 small children living across from the site. More research is needed."

"I have 2 small children and live right across the street. I don't believe there has been enough research into how this will affect our community. "

"This is an inappropriate location that poses serious risk of harm to children. Such sites should be located away from places where children live, play and attend school. The city will be liable for harm to children if they ignore this. Children have no voice in this matter, except through their parents/guardians -- and teachers. Parents are a group most opposed to SISs. Their voices must be heard."

“This proposal is not well thought out. A Drug Injection Site should not be anywhere near an elementary school, and I think those proposing this project would be upset if THEIR children went to school so close to this proposed site.”

“I grew up a few blocks away and am now raising two young kids aged 3 and 4 years old who are in daycare and preschool in the neighbourhood. I received no notifications about this proposal from the City. This is not something I want my kids to grow up being exposed to everyday.”

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<sup>1</sup> City of Toronto (2005). *Toronto Drug Strategy: A Comprehensive Approach to Alcohol and Other Drugs*.  
[http://www1.toronto.ca/city\\_of\\_toronto/toronto\\_public\\_health/healthy\\_communities/files/pdf/tds\\_report.pdf](http://www1.toronto.ca/city_of_toronto/toronto_public_health/healthy_communities/files/pdf/tds_report.pdf)

<sup>2</sup> <http://www.theglobeandmail.com/news/toronto/torontos-top-public-health-official-urges-supervised-drug-injection-sites/article29196176/>

<sup>3</sup> Canada (Attorney General) v. PHS Community Services Society, 2011 SCC 44, [2011] 3 S.C.R. 134.  
<http://scc-csc.lexum.com/scc-csc/scc-csc/en/item/7960/index.do>