

**From:** [Nazlee Maghsoudi](#)  
**To:** [Board of Health](#)  
**Cc:** [Werb, Daniel](#); [Hayley Thompson](#); [Karen McDonald](#)  
**Subject:** BOH June 14, 2021 - CDPE Comments on HL29.2  
**Date:** June 13, 2021 6:52:20 PM  
**Attachments:** [2021-06-14 CDPE Comments to BOH Toronto Overdose Action Plan Status Report 2021.pdf](#)

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To the Members of the Board of Health,

Please find attached comments from the Centre on Drug Policy Evaluation (CDPE) regarding agenda item HL29.2 (Toronto Overdose Action Plan: Status Report 2021) to be considered at the Board of Health meeting on Monday, June 14.

We would greatly appreciate if you could please confirm receipt.

Thanks so much,

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**Submission from Nazlee Maghsoudi,  
Centre on Drug Policy Evaluation**

# **Toronto's Drug Checking Service**

Coordinated by the **Centre on Drug Policy Evaluation**

**Comments for Board of Health Consideration of  
“Toronto Overdose Action Plan: Status Report 2021”**

June 14, 2021

# What does Toronto's drug checking service do?

- Offers people who use drugs timely and detailed information on the contents of their drugs, helping them to make more informed decisions
- Shares information on Toronto's unregulated drug supply to help harm reduction workers and clinicians tailor the care they provide to people who use drugs
- Advocates for services and safer alternatives for people who use drugs

# Free and anonymous drug checking is now available!

## What you give...

A sample, which can be:



## What you get...

A breakdown of what's in your sample and how much,  
**AND tailored harm reduction strategies**

- Analysis using mass spectrometry techniques • Results are available within a day or two •
- Results can be shared in person or by phone •

# Alerts Issued by Toronto's Drug Checking Service in 2021

May 19, 2021



**“Ultra potent” opioids continue to circulate in Toronto’s unregulated drug supply**

May 6, 2021

**Etonitazene identified in Toronto’s unregulated drug supply**

April 22, 2021

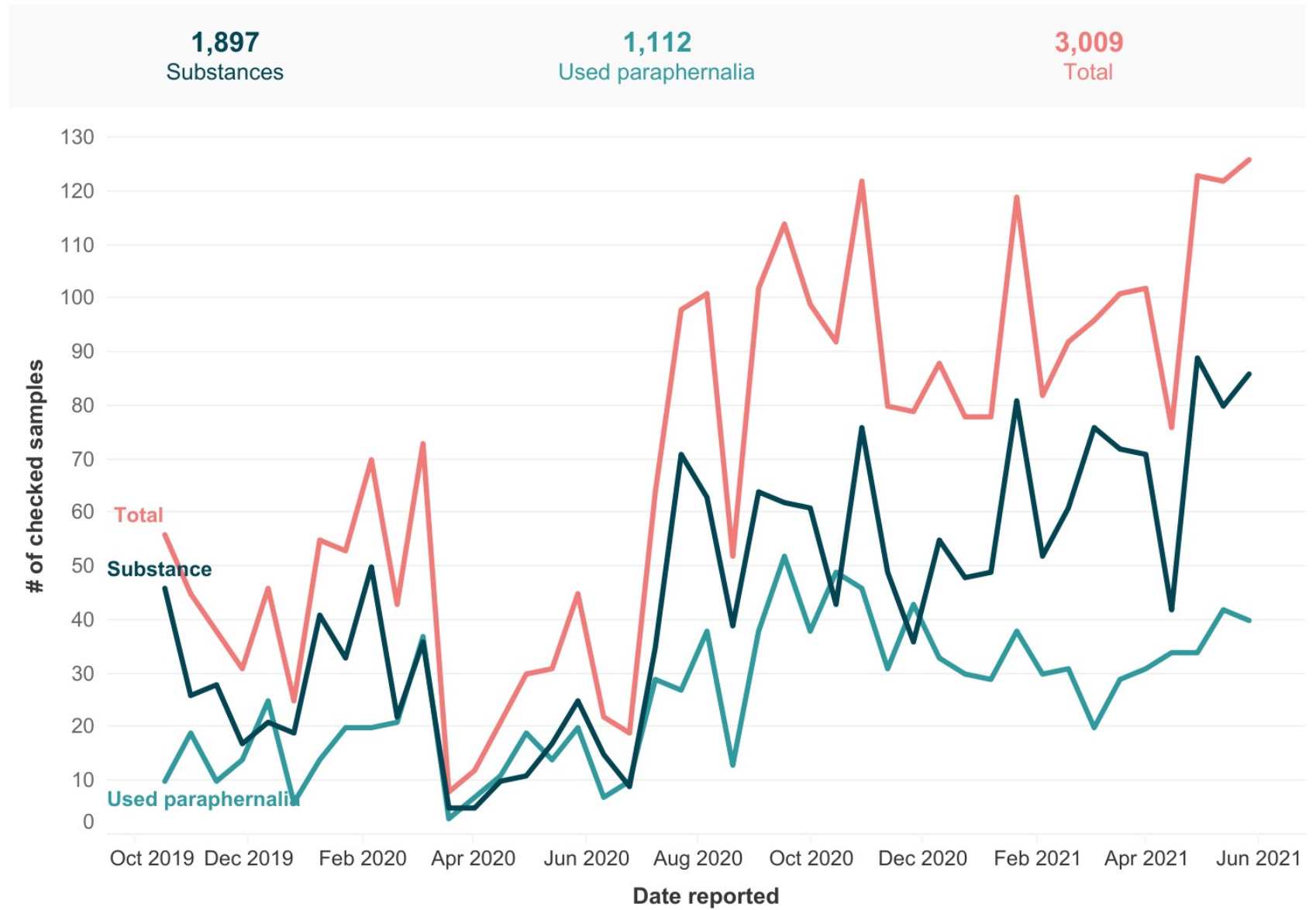
**Isotonitazene identified in Toronto’s unregulated drug supply**

April 8, 2021

**Carfentanil circulating in Toronto’s unregulated drug supply**

## Checked samples by sample type

(Oct 10/19 – June 4/21)



# Checked substance samples by expected drug

(Oct 10/19 – June 4/21)

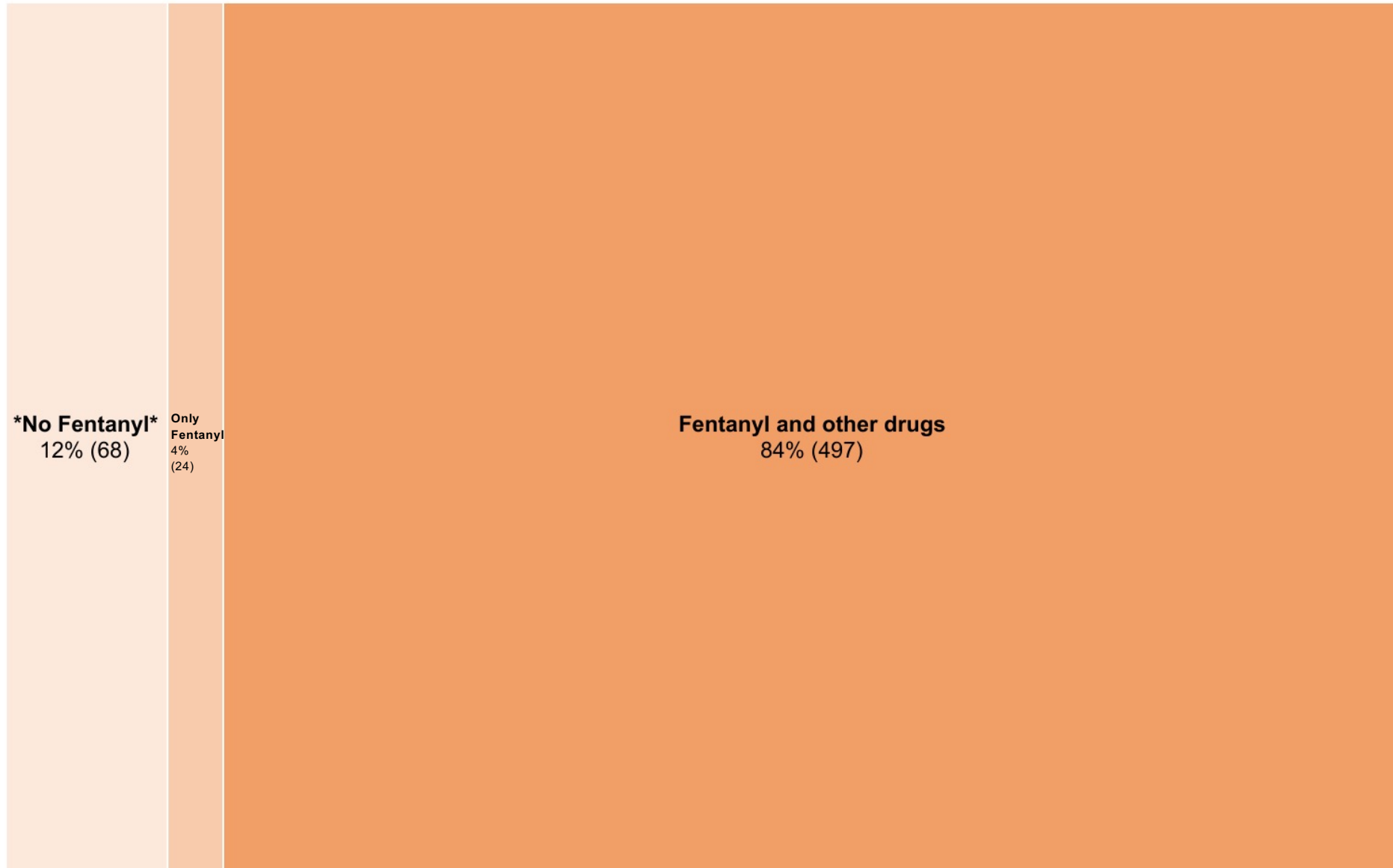
Total: 1,897



**Presence of fentanyl in expected fentanyl substances (589)**

**Time Period**  
All

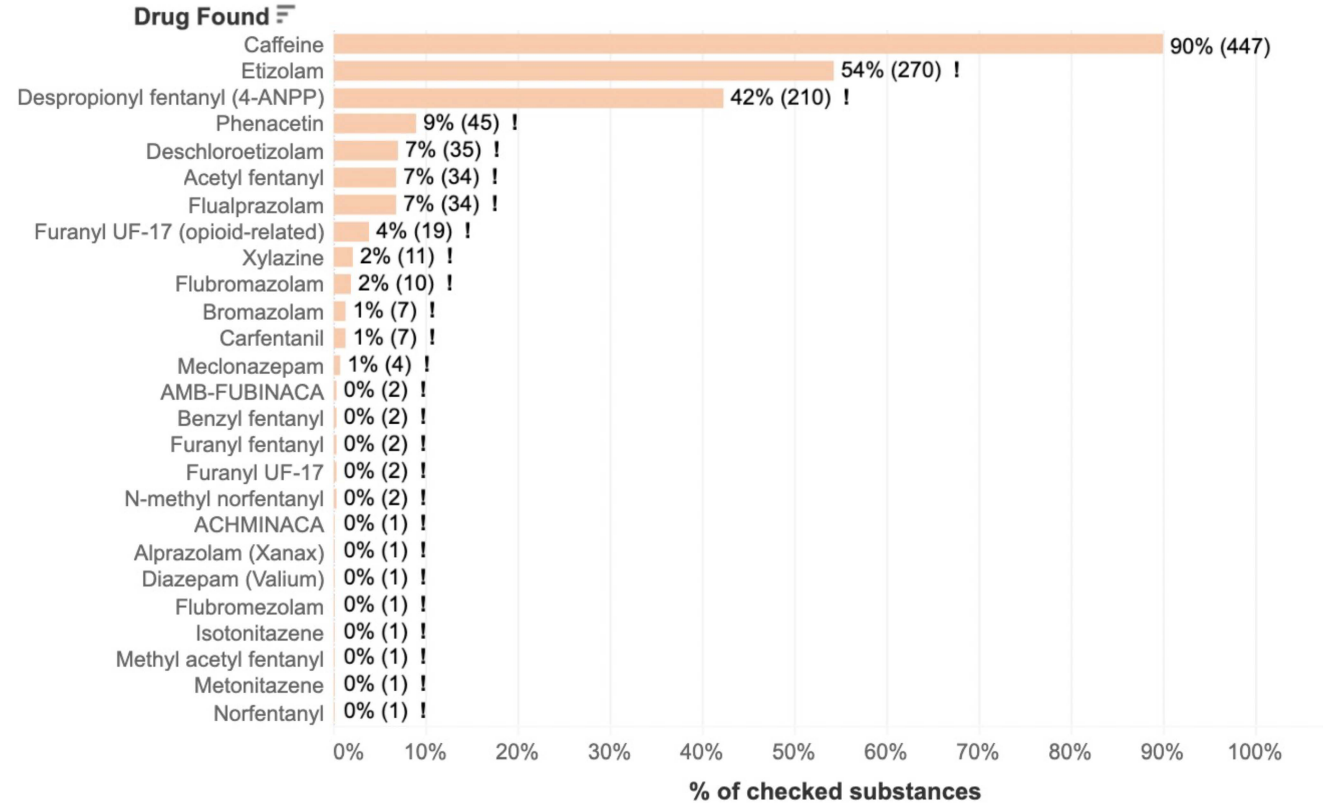
**Expected Drug**  
Fentanyl





**Expected fentanyl substances containing fentanyl and other drugs (497)**

Time Period: (All)   
 Expected Drug: Fentanyl



**! Unexpected noteworthy drug:** “Noteworthy drugs” are drugs that (i) are linked to overdose or other adverse effects, (ii) are highly potent or related to highly potent drugs, or (iii) may not be desired by some clients. Noteworthy drugs are flagged when they are unexpectedly found in checked samples.

# Expected Fentanyl Observations

- ↑ in fentanyl analogues, including carfentanil
- ↑ in “ultra potent” synthetic opioids: isotonitazene\* and etonitazene\*
- ↑ in benzodiazepine-related drugs: etizolam, flualprazolam, flubromazolam, and others
- ↑ in synthetic cannabinoids: ACHMINACA,\* AB-FUBINACA,\* AMB-FUBINACA
- ↑ in xylazine\*

\* and introduction of

# Average<sup>1</sup> Amount of Fentanyl

Based on 218 expected fentanyl substances checked by Toronto's drug checking service  
August 2020 – April 2021

A sample 0.01 gram (10 mg)	A dose <sup>2</sup> 0.1 gram ("a point")	Assumed daily dose <sup>2</sup> 1 gram
490 µg / sample	4,900 µg / dose	49,000 µg / day
~40 – 50 mg of morphine <sup>3</sup> / sample	~400 – 500 mg of morphine <sup>3</sup> / dose	~4,000 – 5,000 mg of morphine <sup>3</sup> / day

<sup>1</sup> Median

<sup>2</sup> Assuming the 10 mg sample is completely representative of the drug that sample is taken from, which may be unlikely given the Chocolate Chip Cookie Effect (see supplementary information)

<sup>3</sup> Range assumes fentanyl is 80 – 100 times stronger than morphine

# Average<sup>1</sup> Amount of Etizolam

Based on 116 expected fentanyl substances checked by Toronto's drug checking service  
August 2020 – April 2021

A sample 0.01 gram (10 mg)	A dose <sup>2</sup> 0.1 gram ("a point")	Assumed daily dose <sup>2</sup> 1 gram
0.2 mg / sample	2 mg / dose	20 mg / day
~1 – 2 mg of diazepam <sup>3</sup> / sample	~10 – 20 mg of diazepam <sup>3</sup> / dose	~100 – 200 mg of diazepam <sup>3</sup> / day

<sup>1</sup> Median

<sup>2</sup> Assuming the 10 mg sample is completely representative of the drug that sample is taken from, which may be unlikely given the Chocolate Chip Cookie Effect (see supplementary information)

<sup>3</sup> Range assumes etizolam is 5 – 10 times stronger than diazepam

# Other Expected Drug Observations

- ↑ in levamisole and phenacetin in expected cocaine and crack
  - Found fentanyl unexpectedly in 3 (of 87) methamphetamine samples and 1 (of 58) MDMA samples
  - Substances expected to be opioids continue to be significantly more contaminated than other expected drugs –79% of methamphetamine substances contained only methamphetamine, yet no heroin substances contained only heroin

# What is the impact of a poisoned drug supply?

**“Toronto experienced a record high number of opioid overdose deaths in 2020.”**

*- Toronto Overdose Action Plan: Status Report 2021*



# We join the Medical Officer of Health in recommending:

- The Board of Health urge the Provincial Minister of Health to **fund longer-term implementation of vital drug checking services** and provide additional funding to create more locations in diverse settings to meet local needs
- The Board of Health reiterate its requests urging the Provincial Minister of Health to **support and fund the implementation of a spectrum of safer supply options**, including listing injectable opioid agonist treatment medication on the Ontario Drug Benefit Formulary

# We join the Toronto Overdose Prevention Society in calling on the City of Toronto to immediately:

1. Enact **drug decriminalization** by urgently requesting a Section 56 exemption from the federal government for the City of Toronto
2. Ensure **people who use drugs** are the primary stakeholder and expert group on all matters related to decriminalization
3. Implement **full-scale harm reduction supports and open overdose prevention sites** in all shelters, respites, and physical distancing hotels



# We join the Toronto Overdose Prevention Society in calling on the City of Toronto to immediately:

4. Ensure mandatory and comprehensive overdose response training is provided to all staff (including security, employment agency, and relief staff) in shelters, respites, and physical distancing hotels
5. Implement regular and rigorous accountability measures to ensure overdose preparedness across all City-funded shelters, respites, and physical distancing sites
6. Declare a moratorium on violent encampment evictions and support overdose response measures for encampment residents

**“We cannot allow this level of death and grief to be normalized.”**

**“We are calling on the City to not wait for other levels of government to step in and provide solutions...We demand that these measures be urgently adopted as continued inaction will inevitably lead to more preventable deaths.”**

*- Toronto Overdose Prevention Society*



# Acknowledgements

We acknowledge the members of our community advisory board, our partner organizations, and those that have lost their lives – both in the ongoing drug poisoning crisis and long before – due to policies of drug criminalization.

We acknowledge that the land on which we operate Toronto's drug checking service is the traditional territory of many nations including the Mississaugas of the Credit, Anishnabeg, Chippewa, Haudenosaunee, and Wendat peoples, and is now home to many diverse First Nations, Inuit, and Métis peoples.

We acknowledge that racialized communities and survivors of colonization are disproportionately impacted by unjust drug policies. We strive to support the development of equitable drug policies that are responsive to the needs of racialized people who use drugs – including Black, Indigenous, and People of Colour – and their communities.

# Supplementary Information

- Questions or comments? You can reach us at [drugchecking@cdpe.org](mailto:drugchecking@cdpe.org).
- Interact with our drug checking data on our website – it's updated every other week: [www.drugchecking.cdpe.org](http://www.drugchecking.cdpe.org). We also regularly post alerts, publish reports, add to our drug dictionary, and share other information about Toronto's unregulated drug supply.

# Chocolate Chip Cookie Effect



**Your analysis results may not be representative of the rest of the drugs in the batch you took your sample from.** You can imagine your batch as a chocolate chip cookie. If you check a piece of the cookie that is only dough, your results may not identify chocolate as present. Mixing a powder or scratching different parts of a pill when preparing a sample can increase the representativeness of your sample.

# Our Partners

LOGO  
COMING SOON  
Community Advisory Board

