

Submission to the Board of Health, Meeting 19, December 9, 2024

Item HL19.2 Responding to the Safer Streets, Stronger Communities Act (Schedule 4: Community Care and Recovery Act)

Submission made by Molly Bannerman, Director of the Women and HIV / AIDS Initiative

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My comments are intended for distribution to the Board of Health.

Please accept this submission with regards to the limitations being placed on supervised consumption sites in Toronto and across Ontario, a portion of the Safer Streets, Stronger Communities Act (Bill 223), Schedule 4: Community Care and Recovery Act

As a resident of Toronto, and the Provincial Director of the Women and HIV / AIDS Initiative, and someone who has worked in harm reduction and overdose prevention sites for more than twenty years, I have deep personal and professional concerns about the lack of evidence informing this Bill and the deadly consequences it will have. For more than 20 years my work has clearly demonstrated that harm reduction and overdose prevention sites are spaces of health, disease prevention, linkages to healthcare, and community safety. The consequence to this bill will include:

- **Increased deaths:** With 2.5 Ontarians dying every hour from drug toxicity, and 2,600 Ontarians dying in the last year, it is guaranteed that the closure of sites will contribute to significant increases in deaths. In Toronto alone, more than 1,600 overdoses have been reversed in the last year at the supervised consumption sites set to close (Auditor General's Report, Opioid Strategy, December 2023). This number will be more than doubled with the remove of Supervised Consumption Sites (SCS) across Ontario.
- **Further Closures:** The limitations placed on municipalities and local boards will effectively close almost all remaining SCSs in Ontario within the coming months, extending the magnitude of this crisis and impact on our communities and health care systems.
- **Emergency Services Crisis:** Each overdose reversal at a SCS is an emergency call avoided. Without this service, 911 calls will increase substantially and the strain on already overburdened emergency rooms will increase significantly.
- **Sexual Health Crisis:** SCSs provide vital HIV, HCV and sexual health services including new drug use and safer sex equipment, education, and health care. The removal of SCSs will result in increased HIV, HCV and STBBIs as evidenced by the move to similar abstinence-based approaches in Alberta where we see a 73% rise in HIV rates in 2023 compared to 2022.

- **Barriers to Health Care Linkages:** For those living with HIV, HCV, STBBIs and other complex health realities, SCSs provide effective, client centred and trauma informed linkages to important care. For people who use drugs, this is a critical service given the level of barriers that exist in the health care system. These linkages to care go beyond individual health care to impacting public and community health.
- **Gendered Violence:** Through a gendered lens, these sites provide safety, autonomy and health for Cis and Trans women, 2-Spirit and Non-Binary people who face discrimination, judgement and increased health risks. Gender based violence is a significant reality that intersects with realities of poverty and these sites are critical safety nets for these communities. This is especially true for Black and Indigenous women and gender diverse people who face a multitude of institutional stigma. SCSs provide referral pathways, social supports, and safety after sexual and gender-based violence. The removal of these sites will see an increase in gender-based violence and reduce supports and linkages to care for those experiencing violence.
- **Community Violence:** These sites include community outreach to link people to services, reduce unsafely disposed of drug use equipment, and community accountability to ensure the area is safe and welcoming. Having worked in these sites, I can attest to a deep level of community care from those who use the site. At Moss Park, for example, in 2017/2018 we saw people who use drugs taking responsibility to ensure the areas was clean, liaise with neighbours who were concerned, and ensure the safety of all. This level of community care is rare and invaluable.

As a resident of Toronto, and through my professional roles in both front line and management positions, I attest to the deep crisis this bill will have on the lives of Torontonians and Ontarians. I urge the Board of Health to act strongly to intervene and prevent the thousands of deaths and negative health impacts this bill will have with the closure of SCSs across Toronto and Ontario.