



May 1, 2017

Hon. Senator Bob Runciman
Chair, Standing Senate Committee on Legal and Constitutional Affairs
Senate of Canada
Ottawa, ON K1A 0A4

Dear Senator Runciman,

On behalf of the Canadian Nurses Association (CNA), I would like to thank you and members of the Standing Committee on Legal and Constitutional Affairs for inviting CNA to present recommendations for the study on Bill C-37, *An Act to amend the Controlled Drugs and Substances Act and other Acts on April 5, 2017. We respectfully regret to see that our key recommendations (cited in our brief to the Committee; enclosed) were not adopted.*

CNA would like to take this opportunity to share our concerns on the three amendments that were outlined in the Committee's report tabled on April 13, 2017 and we ask that these proposed amendments be struck from the Act:

- ***Clause 42, page 44 (a)*** - Adding a minimum period of “not less than 45 days” imposes arbitrary and unnecessary delays to the opening of supervised consumption sites (SCS). At currently reported overdose death rates of four per day in BC and two per day in Ontario, a 45 day minimum wait period could result in hundreds of preventable deaths. Any legislated minimum waiting period serves as a barrier to respond to the current opioid crisis.
- ***56 (1) and (2)*** - Requirements for “expressions of community support or opposition” or the establishment of “a citizen advisory committee” is not supported by evidence and would impose further barriers to granting applications for new SCS. This requirement is contradictory to the government's intention under the Canadian Drugs and Substances Strategy that drug policy decisions be rooted in a strong evidence base.
- ***56.3 (1) and (2)*** - CNA does not support the “requirement” of staff to offer a person using a SCS alternative pharmaceutical therapy prior to each consumption of an illicitly obtained controlled substance. CNA recognizes the benefits of access to opioid agonist treatments including, but not limited to, methadone, Suboxone, and prescription heroin to persons who have expressed or demonstrated readiness for such interventions. This suggested new requirement could also act as a barrier to the health professional-client relationship, thereby compromising benefits of accessing SCS and their related health and social services.

If you have any questions about our concerns as outlined above, please ask your staff to contact David Granovsky, CNA's manager of government relations at 613-237-2159, ext. 525 or via e-

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mail at dgranovsky@cna-aiic.ca.

Sincerely,

A handwritten signature in black ink that reads "Anne Sutherland Boal". The signature is written in a cursive, slightly slanted style.

Anne Sutherland Boal
Chief Executive Officer

Cc: The Hon. Jane Philpott, Minister of Health
The Hon. Peter Harder, Leader of the Government in the Senate
The Hon. Larry Smith, Leader of the Opposition in the Senate