



## HEALTH OFFICERS COUNCIL OF BRITISH COLUMBIA

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To: Leaders, Federal Political Parties  
National Chief, Assembly of First Nations  
Premiers, Provinces and Territories  
(See list of addressees attached)

Dear Leaders.

This letter, on behalf of the Health Officers' Council of British Columbia (HOC)<sup>1</sup>, is to provide you with our recommendations for preventing or mitigating the substantial death, illness, disability, social consequences and human suffering associated with psychoactive substances, including alcohol, tobacco, illegal, prescription and other drugs.

This issue is not getting sufficient attention from any level of government, and HOC requests your support for our recommendations to take action on this issue.

Every year, psychoactive substances (alcohol, tobacco, illegal drugs, and certain prescription drugs) are linked to **greater than 47,000 deaths and many thousands more injuries and disabilities**, and cost Canadians over \$40 billion<sup>2</sup>. Sadly much of this carnage is preventable.

Enclosed is a discussion paper written by the HOC, *Public Health Perspectives for Regulating Psychoactive Substances - What We Can Do About Alcohol, Tobacco, and Other Drugs*, that describes this issue in more detail and provides concrete recommendations for action. (See enclosed, also posted on line at <http://drugpolicy.ca/solutions/research-and-statistics/hocreport/> and <http://www.phabc.org/modules.php?name=Contentpub&pa=viewdoc&cid=11>).

The paper describes how inadequate, inappropriate, and ineffective regulation of these substances contributes in large measure to this terrible toll. The law is a powerful tool for protecting and improving health, and failure to use the law appropriately is contributing to many substance-associated problems. The paper describes the failures and harms caused by implementation of the prohibition policy, and points out that the current prohibition policy is unsustainable. It also describes how adequate, appropriate, and

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<sup>1</sup> Health Officers' Council of BC is a registered society of British Columbia public health physicians who, among other activities, advise and advocate for public policies and programs directed to improving the health of populations. Members of Health Officers' Council of BC (HOC) are public health physicians practicing in British Columbia.

<sup>2</sup> Rehm J, Baliunas D, Brochu S, Fischer B, Gnam G, Patra J, et al *The Costs of Substance Abuse in Canada, 2002*. Ottawa: Canadian Centre on Substance Abuse. March, 2006.

effective public health oriented regulation of illegal substances, alcohol and tobacco holds much promise to reduce this devastating situation.

The core of the paper is a proposed framework for developing policy and regulation designed to protect, improve and promote the health of the public.

HOC specifically calls for action to develop coherent and comprehensive strategies as follows:

- 1 That federal, aboriginal, provincial, territorial, and local governments **use the proposed public health framework described in this paper to review, evaluate and update their psychoactive substances related laws** to ensure that such laws encompass a public health orientation to the regulation of all psychoactive substances.
- 2 In view of the very substantial financial interests of those who profit from and promote the use of alcohol, tobacco, illegal and prescription drugs, **governments should take leadership** on issues related to the production, distribution, promotion and use of substances **by encouraging and supporting consortia** comprised of nongovernmental organizations, professional organizations, private interests, business, people who are actively growing, producing, distributing, retailing and using substances, academics, researchers, and other partners **to make recommendations for public health oriented psychoactive substances policies and programs.**
- 3 That **a national commission of inquiry be established to recommend ways of increasing emphasis on public health oriented approaches** to alcohol, tobacco, currently illegal, prescription, and other psychoactive substances; based on the growing body of evidence of what works and does not work for reducing harms associated with psychoactive substances.

**The commission should involve** the general public; federal, aboriginal, provincial, territorial, and local governments; non-government organizations; professional organizations; private interests; businesses; people who are actively growing, producing, distributing, retailing and using substances; academics; researchers; and other players **to make recommendations for coherent and comprehensive public health oriented psychoactive substances related policies and programs.**

It is clear that we have much to learn about how better manage psychoactive substances in modern society. All governments should encourage, support and evaluate innovative local, regional, and provincial projects. Such a strategy could greatly assist in developing creative solutions for adoption elsewhere in Canada, and potentially in other jurisdictions. For example, with respect to illegal substances, there is much potential to better utilize the exemption provisions of the *Controlled Drugs and Substances Act* to establish scientific studies to investigate many important questions with respect to alternatives to the prohibition policy.

In conclusion the size of the adverse public health impacts of the harms associated with psychoactive substances calls out for coherent and comprehensive public health oriented approaches to better regulate tobacco and alcohol, control the increasing harms associated with prescription pharmaceuticals, and mitigate the ineffectiveness and harm generation associated with prohibition of currently illegal substances.

Public health oriented regulation has much potential to reduce the health, social and fiscal harms associated with all psychoactive substances. In view of extraordinary costs being incurred by individuals, families, businesses, communities, governments, and society more broadly, there is more than enough

justification to invest in processes that holds much promise to reduce the immeasurable human suffering and costs.

Thank you for your careful attention, leadership and commitment and action to this issue and we look forward to a positive response to our recommendations.

Yours sincerely,

A handwritten signature in cursive script that reads "Charmaine Enns".

Charmaine Enns, MD, MHSc, FRCPC  
Chair, Health Officers Council of BC

**List of Addressees*****Federal Party Leaders***

Stephen Harper, Prime Minister of Canada, Leader, Conservative Party  
Bob Rae, Leader, Liberal Party  
Tom Mulcair, Leader, New Democratic Party  
Daniel Paillé, Leader, Bloc Québécois  
Elizabeth May, Leader, Green Party  
Shawn A-in-chut Atleo, National Chief, Assembly of First Nations

***Premiers - Provinces and Territories***

Alison Redford, Premier, Alberta  
Christy Clark, Premier, British Columbia  
Gregory Selinger, Premier, Manitoba  
David Alward, Premier, New Brunswick  
Kathy Dunderdale, Premier, Newfoundland and Labrador  
Bob McLeod, Premier, Northwest Territories  
Darrell Dexter, Premier, Nova Scotia  
Eva Aariak, Premier, Nunavut  
Kathleen Wynne, Premier, Ontario  
Robert Ghiz, Premier, Prince Edward Island  
Pauline Marois, Premier, Quebec  
Brad Wall, Premier, Saskatchewan  
Darrell Pasloski, Premier, Yukon