

Tuesday, April 26, 2016

Hon. Kathleen Wynne, Premier of Ontario
Legislative Building
Queen's Park
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premier@ontario.ca

Hon. Eric Hoskins, Minister of Health and Long-Term Care
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Toronto, ON M7A 2C4
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Re: Urgent Request for Ontario Overdose Coordinator, Plan and Response

Dear Premier Wynne and Minister Hoskins,

Thank you for your letter of January 4, 2016, highlighting some initiatives at the Ministry of Health and Long-Term Care related to opioid use. We have provided your [response](#) to the signatories of the letter of November 2, 2015. That [letter](#), signed by almost 80 organizations and professionals from across Ontario, called for dedicated overdose leadership, expedited overdose planning and response including advancing recommendations found in the Municipal Drug Strategy Coordinators Network of Ontario's (MDSCNO) [Prescription For Life](#) previously provided to the Province of Ontario on June 1, 2015.

We were encouraged to learn from Minister Hoskins that a "health leadership table" had met on October 13, 2015 to discuss a narcotics strategy and respectfully request access to the proceedings of that meeting, as we are keen to work with partners and colleagues in a collaborative and informed way.

We strongly advise that Ontario move ahead immediately to establish leadership to coordinate collaborative planning and responses, including emergency preparedness plans and a clearly defined pathway for invoking emergency health/outbreak measures related to opioid overdoses. Ontario is unprepared for the influx of bootleg fentanyl and other toxic opioids on top of the existing opioid crisis, already called the "greatest drug safety crisis Canada has ever faced."¹ Time is of the essence, and health systems, alongside other sectors, form an essential part of an emergency response.

We respectfully submit that the opioid overdose crisis in Ontario, at one death every 14 hours², is poised to rise sharply given the presence of non-pharmaceutical 'bootleg' opioids, specifically bootleg fentanyl in both powder and pill forms, in several Ontario communities. A surge in opioid-related fatal and non-fatal overdoses is anticipated this year, and/or is thought to already be underway³. On April 15, an overdose public health emergency was declared across British Columbia by Health Minister Dr. Terry Lake and chief Public Health Officer Dr. Perry

Kendall. In Alberta, deaths from bootleg fentanyl spiked 4,500% from 2011-2015⁴, providing a glimpse of what could unfold in Ontario. Similar spikes in bootleg fentanyl deaths are occurring throughout the U.S.A., and in all border states from Ohio to Maine. To add to the urgency, recent seizures of non-pharmaceutical synthetic fentanyl and W-18 in Quebec⁵ and Alberta⁶ are thought to contain enough lethal doses to kill every Canadian⁷.

Ontario communities are working strategically on issues of substance use on an ongoing, collaborative basis by integrating prevention, harm reduction, treatment and justice/enforcement approaches. Critical overdose prevention and intervention initiatives must include a significant and rapid expansion of emergency first aid treatment access (e.g. naloxone), the establishment of real-time surveillance, expedited toxicology processes, and timely mortality reporting as established in British Columbia. We concur with the Honourable Minister of Health Dr. Jane Philpott in calling for a drug policy that is “comprehensive, collaborative, and compassionate,” grounded in a “firm scientific foundation.”⁸

This crisis provides an ideal opportunity to integrate Public Health and health service providers, as noted in the *Patients First: Action Plan for Health Care* released in February. Given the tremendous concern and multi-sectoral expertise that exists within our networks, we urge the Province of Ontario to engage and collaborate with concerned Ontarians. We look forward to having the Province as a partner and working together to ensure the lives of Ontario families are afforded the same level of health and safety protections provided to other important though less common forms of death and injury (e.g., motor vehicle collisions, anaphylaxis, influenza). Communities across Ontario are ready and will benefit from a stronger, enabling and collaborative Provincial role in saving lives and reducing harms.

We thank you in advance for your attention on this urgent matter and look forward to hearing from your office in order to meet and discuss these issues fully. To arrange this meeting, please contact Dr. Rosana (Pellizzari) Salvaterra at rsalvaterra@pcchu.ca / 1-877-743-0101, ext. 264.

Sincerely,

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Canadian Drug Policy Coalition

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Community Harm Reduction Steering Committee, Leeds, Grenville and Lanark

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Grey Bruce Task Force on Crystal Meth and Other Drugs

Guelph Wellington Drug Strategy

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Pinecrest-Queensway Community Health Centre

Positive Living Niagara

Possible Campaign

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The Canadian Harm Reduction Network

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Wellington Guelph Drug Strategy

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Windsor-Essex County Health Unit

Woodstock and Area Community Health Centre

Woolwich Community Health Centre

cc: Dr. Bob Bell, Deputy Minister, Ministry of Health and Long-Term Care
Sharon Lee Smith, Associate Deputy Minister, Policy and Transformation, Ministry of Health and Long-Term Care
Roselle Martino, Assistant Deputy Minister, Population and Public Health Division, Ministry of Health and Long-Term Care
Dr. David Williams, Chief Medical Officer of Health
Linda Stewart, Executive Director, Association of Local Public Health Agencies (ALPHA)
Gordon Fleming, Manager, Public Health Issues, Association of Local Public Health Agencies (ALPHA)

¹ Dr. David Juurlink (2015). A prescription for curing Canada's opioid epidemic. November 15, 2015: <http://ipolitics.ca/2015/11/20/a-prescription-for-healing-canadas-opioid-epidemic/>.

² Municipal Drug Strategy Coordinator's Network of Ontario (2015). Analysis of 2000-2013 data provided by the Office of the Chief Coroner for Ontario, correspondence 2015.

³ An unprecedented number of Ontario communities have issued Overdose Alerts in 2016, including Kingston, London, Niagara, Toronto (2) and Waterloo region (2). Further, non-pharmaceutical 'bootleg' opioids have been reported in several other Ontario jurisdictions.

⁴ Alberta Medical Examiner (2016), as cited in the Calgary Herald, December 18, 2015, <http://calgaryherald.com/news/local-news/how-fentanyl-shocked-alberta>.

⁵ CBC News, April 18, 2016: <http://www.cbc.ca/news/canada/montreal/fentanyl-quebec-city-police-seized-1.3541118>

⁶ Globe and Mail, April 20, 2016: http://www.theglobeandmail.com/news/alberta/alberta-police-seize-drug-100-times-more-deadly-than-fentanyl/article29692152/?click=sf_globe

⁷ The lethal dose of fentanyl in humans is estimated at 2mg, as per the European Monitoring Centre for Drugs and Drug Addiction, Fentanyl Drug Profile (Jan 8, 2015): <http://www.emcdda.europa.eu/publications/drug-profiles/fentanyl>

⁸ Government of Canada, April 20, 2016. Plenary Statement for the Honourable Jane Philpott Minister of Health – UNGASS on the World Drug Problem: <http://news.gc.ca/web/article-en.do?mthd=tp&ctr.page=1&nid=1054489&ctr.tp1D=980&ga=1.155928699.1949992869.1461169789>