

Honourable Adrian Dix
Minister of Health

Sent via email: HLTH.Minister@gov.bc.ca

Honourable Mike Farnworth
Minister of Public Safety & Solicitor General

Sent via email: PSSG.Minister@gov.bc.ca

June 18th, 2020

Dear Minister Dix and Minister Farnworth:

We write with great urgency over the twin epidemics of overdose and COVID-19 in this province. We urge you to take still more steps to create true safer supply. Pacific AIDS Network (PAN) is comprised of 40 member organizations* working on HIV, hepatitis C, harm reduction and related issues. Many PAN members are on the front lines of the overdose crisis, providing essential harm reduction services and programs across BC.

When the new guidance was announced on March 26th, PAN members welcomed the decision. While we wish to express our appreciation for the government's leadership in introducing the guidance - it is clear that the current patchwork approach is not working. In May the province recorded 170 suspected illicit drug toxicity deaths — the highest monthly total ever recorded - 5.5 deaths a day.

There have been too many challenges on the implementation side of the guidance. Each week since the pandemic began, PAN has been convening virtual meetings with the Executive Directors of our member and allied organizations. This has afforded us the opportunity to hear directly from the front lines, how the guidance is being interpreted and effected in each of the different health regions. Here are our concerns:

- First and foremost, a lack of access to prescribers – particularly true for persons who live outside of the Lower Mainland. We have also heard repeatedly that prescribers are unwilling or uncomfortable to participate, as they feel that there is a lack of sufficient evidence, that it is outside of their area of expertise, and/or they do not want to add to their already busy caseloads and “take something more on”. We have also heard that those prescribers that are willing to support safer supply, are concerned about their licenses and potentially being disciplined – and therefore are interpreting the guidance conservatively. Finally, some are simply unwilling to participate due to their own biases about drug use and stigma towards people who use drugs.
- Similarly, we are hearing of a lack of sufficient numbers of pharmacists willing to support safer supply in smaller urban and rural communities. We have also heard of pharmacists – even in large urban centres - who are refusing to fill prescriptions, questioning dosages, and/or not referring people to colleagues at the same pharmacy or elsewhere.
- The guidance is being interpreted in different ways in different health authority regions – both by prescribers as well as the health authorities themselves. The guidance as written is intended to

support people who are at risk of COVID-19 infection, as well as those with a confirmed infection or a suspected case pending diagnosis. Persons who use drugs are at additional risk of COVID-19 infection due to the challenges they encounter with physical distancing, with poverty and with being unsheltered/unstably housed. Despite this, in some health authority regions, the only persons who are being offered safer supply are those who are in formal quarantine due to COVID-19 symptoms or diagnosis.

- As noted, some prescribers are interpreting the guidance in the most conservative ways possible, and are only prescribing substitution treatments, such as methadone, buprenorphine/suboxone, and slow release oral morphine. While for some people these are of some benefit, for many others they are inadequate as they do not provide the same effects that people are seeking. Substitution therapies must be provided in combination with safer supply. In every instance, these narrow interpretations of the guidance are unacceptable.
- Finally, significant challenges / barriers exist for persons who are needing to access safer supply who use stimulants, alcohol and benzodiazepines. In many BC communities, members of the public, service providers and prescribers are not even aware that the guidance can be applied to support people in these situations.

In every instance, narrow interpretations of the guidance are unacceptable. COVID-19 has resulted in an increasingly toxic illicit drug supply and the loss of some OPS and other safe spaces such as libraries and community centres. It is vital that all levels of government take the necessary steps - and the province needs to demonstrate true leadership - to ensure that people who use drugs are provided with necessary health services and other supports to ensure that overdoses cease.

Calls to Action:

We call on the Ministry of Health to continue to work with and engage the College of Physicians and the College of Pharmacists to support the implementation of true safer supply.

We would like to see the creation of structured opportunities for prescribers who want to be involved with safer supply to connect with each other, to offer mutual support and information. Ideally this could take place on a regional basis. We applaud the government for taking the step to initiate a 24-7 phone line for health care professionals to access addiction specialists for advice. But more must be done.

We would like to see the Ministry of Health take definite steps to increase the number of prescribers.

These are interim guidelines that were announced in March, and it is our understanding that they are to expire in September. Given the overdose situation, it is our expectation that the guidelines will continue beyond September – and that you will work with your federal counterparts to ensure that any regulatory barriers are removed.

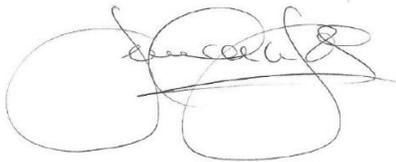
We call upon both of your ministries to engage with people who use drugs, as well as organizations on the front lines, to inform policies and practices regarding safer supply.

The leadership of people who use drugs is critical to the provincial response, now more than ever. This includes providing them with the resources required so they can deliver necessary programs and alternative dispensing models. User groups such as the BC Yukon Association of Drug War Survivors have the expertise and the solutions. We all need to listen.

Finally, we call upon the Ministry of Public Safety and Solicitor General to re-examine its position on PHO Dr. Bonnie Henry's 2019 report [Stopping the Harm](#). Now is the time to implement her recommendations and proceed with the decriminalization of the possession of illegal drugs in the province.

The impacts of COVID-19 on people who use drugs are becoming terribly clear - with 170 deaths in May, this single month has exceeded all of the lives lost due to COVID-19 since the pandemic began in BC. While all loss of life is tragic, so much of what is happening now for people who use drugs is preventable. To continue with bad policies and bad practices, when solutions exist – is unconscionable.

Sincerely.



J. Evin Jones
Executive Director

CC. Hon. Judy Darcy, Minister of Mental Health and Addictions
Dr. Bonnie Henry, Provincial Health Officer
Lisa Lapointe, B.C.'s Chief Coroner

* PAN is comprised of the following member organizations, listed by region or provincial mandate:

Interior

ANKORS
ASK Wellness
Boys & Girls Club of Williams Lake
Kamloops Aboriginal Friendship Society (KAFS)
Living Positive Resource Centre (LPRC)

North

Blood Ties Four Directions Centre
Central Interior Native Health Society
Dze L K'ant Friendship Centre
Fort Nelson Aboriginal Friendship Society
North Coast Transition Society
Positive Living North - No khēyoh t'sih'en t'sehena Society (PLN)
Prince George AIDS Prevention Program - Northern Health
Prince George New Hope Society
Quesnel Shelter and Support Society – Seasons House
Quesnel Tillicum Society
Southside Health

Fraser

Afro-Canadian Positive Network of BC
Fraser Region Aboriginal Friendship Centre Association - Positive Health Outreach Program
Pacific Connections – Pacific Community Resources Society (PCRS)
Positive Living Fraser Valley Society (PLFV)
Progressive Intercultural Community Services (PICS)
Purpose Society - HIV Program
SARA For Women

Vancouver Island

AVI Health and Community Services (AVI)
Society of Living Illicit Drug Users (SOLID)
Vancouver Island Persons Living with AIDS Society (VPWAS)

Vancouver

AIDS Vancouver (AV)
Carnegie Community Centre - AIDS Support Group
DTES HIV/IDU Consumers' Board
Heart of Richmond AIDS Society
Lookout Emergency Aid Society
McLaren Housing
Vancouver Friends For Life Society (FFL)
YouthCO HIV & Hep C Society (YouthCO)

Provincial

Community-Based Research Centre for Gay Men's Health
Dr. Peter AIDS Foundation
HepCBC Hepatitis C Education and Prevention Society
Health Initiative for Men (HIM)
Pacific Hepatitis C Network