



Thank you for this opportunity to address the Board. I'm the Executive Director of Families for Addiction Recovery (FAR). FAR was founded by parents whose children have struggled with substance use disorder, or SUD, from their early teens. FAR exists because the needs of our families are not being met. We expect our children to receive treatment, not punishment, for being ill. That rarely happens today.

FAR is a member of the Working Group on an alternative approach to drug criminalization in Toronto. FAR endorses Dr. de Villa's recommendations for an alternative approach to the criminalization of drugs and, in particular, that:

- 1. The Board of Health reiterate its call requesting the Federal Minister of Health to use their authority under the Controlled Drugs and Substances Act to:
 - a. Develop a national framework to permit the simple possession of all drugs for personal use; and
 - b. Support the immediate scale-up of prevention, harm reduction, and treatment services.
- 2. The Board of Health direct the Medical Officer of Health to submit a request to Health Canada by the end of 2021 for an exemption under Section 56(1) of the Controlled Drugs and Substances Act, thereby starting a process to decriminalize the personal possession of illicit substances within the City of Toronto's boundaries.

I would like to reiterate a point I made during my last deputation in June of this year. According to the 2016 Census, there were over 5,000 municipalities in Canada. We cannot afford to be doing this on a city-by-city, municipality-by-municipality, or even province by province basis. Our criminal laws fall under federal jurisdiction. When someone is convicted of committing a crime they are labelled as "criminals" which can have serious and harmful lifelong effects. The same activity shouldn't be criminal or not-criminal depending on where you live in Canada. Decriminalization should be national in scope. Anything less is illogical, inequitable and unethical.

We will reserve comment on the details of the particular model being developed until it has been finalized and made public. It is, however, difficult to understand why the Working Group has been tasked with developing pathways to treatment and services. Many people use illegal drugs non-problematically and many who use legal substances do so problematically. In fact, alcohol is the substance with the greatest cost to the criminal justice system. It would make more sense to examine alternative pathways to treatment and services in the context of all substances and in the context of all mental health conditions under the Mental Health Act.