



Dear Minister Jones and Dr. Kieran Moore:

cc: Medical Officers of Health, Ontario
Public Health Ontario
Ontario Public Health Association
Infection Prevention and Control Canada
Public Health Agency of Canada
Association of Local Public Health Agencies

RE: Prohibition of sterile needle and syringe distribution within HART Hubs

Since 1989, needle and syringe programs (NSPs) have been a core public health intervention to prevent the spread of infections and preserve the health of people who use drugs in Ontario.ⁱ NSPs provide people who inject drugs with the equipment they need to avoid acquiring and/or transmitting blood-borne infections such as HIV and hepatitis C (HCV). Research in Canada has consistently shown that NSPs are a cost-effective way to [reduce the risk of HIV and HCV transmission, abscesses, and cardiac infections](#), and are a low-threshold way to connect people to healthcare services.ⁱⁱ The health and public health benefits of distributing sterile injection equipment are well-recognized and established in the peer-reviewed scientific literature. This is why NSPs have been recommended by international health organizations, including the [World Health Organization](#), as essential elements of effective HIV and HCV prevention strategies for decades.ⁱⁱⁱ

Yet, despite four decades of evidence underscoring the individual and public health benefits of NSPs, Ontario has chosen to prohibit all [Homelessness and Addiction Recovery Treatment \(HART\) Hubs from distributing sterile needles and syringes](#).^{iv} This is a dangerous move, especially at a time when [HIV infections](#) in Canada are on the rise. In 2022, 9.3% of Ontario's 475 new HIV infections were among people who inject drugs,^v with women accounting for 26.9% of all new HIV diagnoses.^{vi} While there have been significant advances in treating HIV and HCV, treatment is expensive, and HIV, while a chronic manageable condition for those who have access to care and treatment, cannot be cured. Therefore, prevention remains paramount.

Your government has made clear that [HART Hubs](#) are designed to treat clients with complex service needs, providing them with safety and support for substance use.^{vii} [Research](#) has shown that NSPs improve access to healthcare services and help to build relationships between healthcare providers and people who inject drugs.^{viii} In short, the implementation of NSPs lead to overall improvements in health and wellbeing, and increased entry into substance use treatment programs — the ostensible goal of HART Hubs. Depriving people who use drugs of the tools that keep them safe and healthy will lead to poorer health outcomes for them, and is completely antithetical to Ontario's own public health standards.

In 2018, Ontario’s then-Ministry of Health and Long-Term Care produced its [Substance Use Prevention and Harm Reduction Guideline](#) (the “Guideline”), affirming that the “distribution of needles/syringes and other drug use supplies has proven to be an effective method in reducing blood-borne infections associated with injection drug use, such as HIV and hepatitis C” by reducing “the sharing and re-use of needles, syringes, and other supplies” as well as “discarded needles and syringes in the community.”^{ix} At the same time, the Guideline acknowledges that an NSP “provides a point of access into health and social services for clients who may not otherwise have access to such services, as well as opportunities for education on safer drug use practices.” As such, the Guideline instructs boards of health to “provide or ensure the availability of sterile needles and syringes, as well as safer drug use supplies currently funded and provided through the Ontario Harm Reduction Distribution Program to individuals who use drugs in the public health unit’s region.” The Guideline remains in place and, in the Ministry of Health’s own Opioid Strategy Performance Indicators, “Number of needles/syringes distributed” was added after the [Auditor General](#) audit of Addictions Treatment Programs in 2019.^x

Similarly, in 2023 Ontario’s Advisory Committee on HIV/AIDS produced an [HIV Action Plan to 2030](#) that confirms that “sterile drug using equipment, needle exchange programs, and consumption and treatment services” prevent the spread of HIV and calls for “expanding access to harm reduction supplies.”^{xi}

The absolute restriction on needle and syringe distribution within HART Hubs completely contradicts a well-researched body of medical and public health evidence showing that these programs prevent HIV and HCV infections.² We must continue to provide proven tools to prevent infections, reduce healthcare costs, and connect people who use drugs to healthcare services. The attempt to close these vital health programs must be stopped, as closing or limiting their availability increases risks and will harm populations who are already vulnerable due to homelessness and stigma.

We strongly call on the Province of Ontario to listen to decades of evidence and reverse the disastrous policy decision restricting HART Hubs from sterile needle and syringe distribution. These programs are a crucial part of our public health infrastructure, and they must be maintained.

ⁱ C. J. Strike, T. Myers, and M. Millson., “Finding a place for needle exchange programs,” *Critical Public Health* 14, 3 (2004): pp 261-275.

ⁱⁱ Working Group on Best Practice for Harm Reduction Programs in Canada, *Best Practice Recommendations for Canadian Programs that Provide Harm Reduction Supplies to People Who Use Drugs and are at Risk for HIV, HCV, and Other Harms*. 2021.

ⁱⁱⁱ World Health Organization, *Guide to Starting and Managing Needle and Syringe Programmes*. January 2007.

^{iv} Ontario Ministry of Health, *Homeless and Addiction Recovery Treatment Hubs Call for Proposals: Guideline and Application*. August 2024.

^v Public Health Agency of Canada, *Canada’s Progress Towards Ending the HIV Epidemic*. November 2022.

^{vi} Ontario HIV Epidemiology and Surveillance Initiative, *HIV diagnoses in Ontario, 2022*. November 2024.

^{vii} Ontario Ministry of Health, *Homelessness and Addiction Recovery Treatment (HART) Hubs Client Journey*. August 2024.

^{viii} Centers for Disease Control and Prevention, *Safety and Effectiveness of Syringe Services Programs*. February 2024.

^{ix} Ontario Ministry of Health and Long-Term Care, *Substance Use Prevention and Harm Reduction Guideline*, 2018. January 2018.

^x Office of the Auditor General of Ontario, *Performance Audit: Implementation and Oversight of Ontario's Opioid Strategy*. 2024.

^{xi} Ontario Advisory Committee on HIV/AIDS, *HIV Action Plan to 2030 Closing the gaps in the HIV care cascade in Ontario*. December 2023.