

Q8. Which of the following best expresses your view of the proposed Bill? (please note this is a compulsory question)

Fully supportive

Please explain the reasons for your response.

I support the stated objectives which underpin the proposed Bill - establishing Overdose Prevention Centres (sometimes also referred to elsewhere as supervised drug consumption facilities or rooms) to: (a) seek to reduce overdose deaths; (b) seek to prevent and reduce blood-borne virus transmission, and (c) provide people who use drugs with opportunities to interact with professionals and, potentially, access further services and supports. Harm reduction and healthcare measures offered through these OPCs can seek to reduce infections that arise from injecting drugs, reduce unsafe disposal of drug-related litter, as well as encourage options like engaging with peer supports for recovery, referrals to residential rehabilitation and various other health and social care services.

The public health emergency of drug deaths is a tragedy that warrants multi-faceted action. This proposed Bill seeks to compel action in one specific way towards reducing drug deaths, with the recognition that making progress with other approaches and courses of action will be very much needed alongside this proposal of establishing Overdose Prevention Centres in Scotland. The proposed Bill also contains an emphasis on collaboration and inclusion of people with lived experience of drug use; that emphasis and their voices and views are welcome.

Q9. Do you think legislation is required, or are there are other ways in which the Bill's aims could be achieved more effectively? Please explain the reasons for your response.

There are well rehearsed arguments and well documented problems and hinderances with trying to make progress in this area of policymaking and legislative reform in the United Kingdom. In my personal view, a significant amount of these problems relate to the Misuse of Drugs Act and Regulations and the drug policy positions and inaction of the UK Government, which can then have implications for Scotland.

Substantive questions of legislative competence will likely be raised and tested if or as this proposed Bill progresses (matters which are best analysed by others much better qualified than I am in this regard). However, taking it at face value, yes, I do personally believe that it is worth trying to pursue primary legislation through the Scottish Parliament to seek to advance the Bill's aims and objectives.

Q10. Which of the following best expresses your view of the proposal to establish overdose prevention centres?

Fully supportive

Please explain the reasons for your response.

Overdose Prevention Centres have been established in at least 14 other nations, including Australia, Denmark, France, Germany, Greece, the Netherlands, Portugal, Norway, Spain, Switzerland, and Canada. I support Scotland joining that list of nations with OPCs. Stigmatisation and the fear of criminalisation for what is a health issue has proven far too costly, especially for those living in deprived areas and circumstances affected by poverty and inequality. OPCs are one approach to harm reduction and healthcare provision that, if established in Scotland, will complement and co-exist alongside other support options for treatment, rehabilitation and recovery.

Professor Alex Stevens from the University of Kent, an eminent expert in drugs policy and research, has called for Overdose Prevention Centres to be established in the UK, noting international evidence and experience in support of their efficacy. In a recent media interview, he states that "they actually reduce the problems they're having with people using drugs in public, people see less needles being discarded in car parks and playgrounds and also there are fewer costs on the local health service because there are fewer ambulance call-outs. These centres are not an answer on their own, they should be part of a comprehensive package to try and address this public health crisis we are going through" (Stevens, quoted in Castle, 2022). Furthermore, an academic systematic review of the public health and public order outcomes of OPCs or supervised drug consumption facilities (SCFs) by Kennedy, Karamouzian and Kerr (2017: pg 161) found 'consistent evidence demonstrates that SCFs mitigate overdose-related harms and unsafe drug use behaviours, as well as facilitate uptake of addiction treatment and other health services among people who use drugs. Further, SCFs have been associated with improvements in public order without increasing drug-related crime. SCFs have also been shown to be cost-effective.' These align with the stated objectives of this proposed Bill, and it is my hope that Scotland is able to achieve these public health and public safety outcomes, too.

Q11. Which of the following best expresses your view of the proposal for a licensing regime to enable the establishment of overdose prevention centres?

Do not wish to express a view

Please provide reasons for your response, including on the proposed conditions for licensing (see pages 12 to 14 of the consultation document) and on the proposal that health and social care partnerships are responsible for licensing and scrutinising OPCs?

I do not personally know enough about the details involved in this aspect of the proposed Bill to offer an informed view on licencing regimes for Overdose Prevention Centres. I'll leave that for people with more expertise and experience in this specific area to comment.

Q12. Which of the following best expresses your view of the proposal for a new body, the Scottish Drugs Deaths Council?

Do not wish to express a view

Financial Implications

Q13. Any new law can have a financial impact which would affect individuals, businesses, the public sector, or others. What financial impact do you think this proposal could have if it became law?

skip to next question

Equalities

Q14. Any new law can have an impact on different individuals in society, for example as a result of their age, disability, gender re-assignment, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

What impact could this proposal have on particular people if it became law? If you do not have a view skip to next question.

Please explain the reasons for your answer and if there are any ways you think the proposal could avoid negative impacts on particular people.

No Response

Sustainability

Q15. Any new law can impact on work to protect and enhance the environment, achieve a sustainable economy, and create a strong, healthy, and just society for future generations.

Do you think the proposal could impact in any of these areas? If you do not have a view then skip to next question.

Please explain the reasons for your answer, including what you think the impact of the proposal could be, and if there are any ways you think the proposal could avoid negative impacts?

No Response