



## Your Views On The Proposal

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.**

The evidence suggests that a wide and diverse toolset is necessary to help deal with the multifaceted issues and harms related to substance misuse. OPCs have the potential to have direct benefits in terms of their potential to reduce multiple harms, including drug deaths.

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.

Legislation is a key tool to provide the comfort of legally viable routes to provide drug support services - whether it is by de facto or by de jure legalisation of various elements of drug possession, consumption and supervision.

Beyond that even if the acquisition, possession and consumption of drugs were in all respects decriminalised there is still a clear necessity to have legally statutes. These would be necessary to provide control and oversight of the production and procurement of substances, and especially the services which are intended to deal with problematic substance use. Pharmaceuticals and alcohol have a host of legal controls surrounding them and a similar logic must apply to drugs.

Key to reducing drug deaths and associated harms is an approach which fully embraces the principle that substance use is a health issue, not a criminal justice issue. Legislation - whether new, altered or removed - is obviously key to enabling this shift of focus wholly toward a health based approach.

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.**

Let us imagine for a moment that OPCs would not directly prevent a single death - even then their presence would reduce the harms associated with discarded contaminated needles in our communities and the harms around poor injecting practices. The fact that they are also a vehicle that could directly reduce drug deaths is by no means the sole benefit of operating OPCs.

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

Fully supportive

**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?**

Licensing would give comfort to communities that those operating OPCs were capable of doing so safely and appropriately. It would also give comfort to the providers that they were not exposing themselves to potential legal action in terms of the criminal justice system.

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

Partially supportive

**Please provide reasons for your response, including views on the proposed functions of the SDDC (see pages 14 to 16 of the consultation document) and on how it should operate in practice.**

I have only selected 'Partially supportive' because I'm not fully acquainted with the current range of organisations that work toward reducing drug related harms in Scotland. Assuming such a body would not be largely duplicating work done elsewhere then yes such an entity would be entirely appropriate.

## 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?

some reduction in costs

**Please explain the reasons for your answer, including who you would expect to feel the financial impact of the proposal, and if there are any ways you think the proposal could be delivered more cost-effectively.**

The Portugese example demonstrates that the greater the focus on substance misuse as a health issue rather than a criminal justice issue, and the greater the focus on harm reduction, the lower the overall costs to society will be.

## 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?

OPCs would have the potential to improve the environment in areas with high rates of drug consumption, taking the (potentially hazardous) drug related litter off of the streets.

