



Canadian Mental  
Health Association  
Ontario

Association canadienne  
pour la santé mentale  
Ontario

Standing Committee on Social Policy  
99 Wellesley Street West  
Room 1405, Whitney Block  
Queen's Park  
Toronto, ON M7A 1A2

December 6, 2019

Dear Members of the Standing Committee on Social Policy:

**Re: Bill 116 – Foundations for Promoting and Protecting Mental Health and Addictions Services Act, 2019**

On behalf of Canadian Mental Health Association (CMHA) Ontario, I would like to thank you for this opportunity to present our support for Bill 116 – Foundations for Promoting and Protecting Mental Health and Addictions Services Act, 2019.

The mission of CMHA Ontario – a not-for-profit, charitable organization funded by the provincial Ministry of Health – is to improve the lives of all Ontarians through leadership, collaboration and the continual pursuit of excellence in community-based mental health and addictions services. As a leader in community mental health and addictions, we are a trusted advisor to government and actively contribute to health systems development through policy formulation and recommendations that promote mental health for all Ontarians. We support our 30 community branches which, together with other community-based mental health and addictions service providers, serve approximately 500,000 Ontarians each year. It is from this perspective that we offer our recommendations for this proposed legislation.

**Schedule 1: Mental Health and Addictions Centre of Excellence Act, 2019**

On behalf of CMHAs across Ontario, we are pleased to endorse the creation of the Mental Health and Addictions Centre of Excellence within Ontario Health. We support the overall philosophy, which aims to create an integrated mental health and addictions system of care that is easy to navigate for Ontarians. Specifically, we are pleased with the purpose of the Centre which is “to lay a foundation to support a mental health and addictions strategy in Ontario.”

The government has cited Cancer Care Ontario as an example for the creation of this new Centre of Excellence. Cancer Care Ontario has a track record of equipping health professionals, organizations and policy-makers with the most up-to-date cancer knowledge and tools to prevent cancer and deliver high-quality patient care. The Centre of Excellence offers a unique opportunity to also provide such quality-driven care for Ontarians with mental health and addictions issues.

**CMHA Ontario recommends that the mandate of the Centre of Excellence focus on the implementation of core mental health and addictions services across the province, rigorous data collection, and health quality improvement initiatives.**

CMHA Ontario recommends greater access to a standardized core set of mental health and addictions services across Ontario, with a focus on providing seamless programs and support across the lifespan, from children and youth to adults and seniors. Core services can ensure greater access to consistent treatment delivery across Ontario, reduce emergency department visits, help clients navigate the system, and lead to better overall health outcomes. Core services across all regions of the province would ensure greater health system integration and improved client experiences. In other words, Ontarians could find the right services, where and when they need them.

Greater investments are also needed to build the data infrastructure of the community mental health and addictions sector. Without valid, comparable, consistent data, we cannot adequately measure our performance. Quality improvement initiatives cannot succeed without this necessary data infrastructure. The first step for the Centre of Excellence is to invest in and implement a data strategy for the entire community-based mental health and addictions sector.

Many CMHA branches across Ontario are leading the path to continuous health quality improvement. Often, they are doing this in conjunction with the [Excellence through Quality Improvement Program](#) (E-QIP), which is led in partnership between CMHA Ontario, Addictions and Mental Health Ontario, and the Provincial System Support Program at the Centre for Addiction and Mental Health. E-QIP provides quality improvement education, training and resources, and builds capacity within the mental health and addictions sector. The project ensures dedicated and skilled service providers have the support they need to improve the quality of care they offer to clients. E-QIP provides coaching to health service providers to help streamline health service delivery and implement cost-effective and efficient methods to enhance service provision. We hope to further expand our innovative E-QIP program with support from the Centre for Excellence in Mental Health and Addictions.

## **Schedule 2: Opioid Damages and Health Care Costs Recovery Act, 2019**

CMHA Ontario and our branches endorse this legislation and support the Government of Ontario to take direct and distinct action against manufacturers and wholesalers of opioid products (as defined in the Act) to recover the cost of health care benefits caused or contributed to by an opioid-related harm or wrongdoing. We further recommend that any damages awarded from litigation be directed into frontline community-based mental health and addictions service delivery.

Opioids are natural or synthetic substances used to treat pain in clinical settings but are also produced and consumed non-medically. While they can be an effective form of pain management for some clients, harms related to opioid have become a significant public health crisis.<sup>i</sup> Ontario is facing substantial opioid-related harms, with increases in emergency department visits, hospitalizations and fatal overdoses. Although it has been deemed as the leading cause of death among people aged 30 to 39,<sup>ii</sup> individuals across all ages, genders, communities, and socioeconomic strata have been deeply impacted. This is due to a variety of factors, including an increase in high strength opioids on the illicit drug market, historical over prescription of opioids for pain management, and both stigma and criminalization related to substance use.

The current opioid overdose crisis in Ontario does not show any signs of slowing, and in fact, has been credited as the reason behind a stagnant life expectancy rate. Since 2013, we have seen a steady increase in opioid-related deaths, the highest of which have been recorded in recent years. The statistics are stark:

- 867 opioid-related deaths in 2016
- 1,265 opioid-related deaths in 2017
- 1,473 opioid-related deaths in 2018<sup>iii</sup>
- A nearly 70 per cent increase in the number of opioid-related deaths between 2016 and 2018

Opioid-related emergency departments (ED) visits across Ontario are also growing at alarming rates:

- 4,427 ED visits in 2016
- 7,764 ED visits in 2017
- 9,154 ED visits in 2018

Publicly available statistics from early 2019 show a continued increase in ED visits.<sup>iv</sup> In Toronto alone, paramedics have reported to attending to almost 70 calls per week on average related to suspected opioid overdoses, over the past year.<sup>v</sup>

**CMHAs across Ontario work from a harm reduction approach, and we fully support the Consumption and Treatment Services (CTS) model and continue to recommend the expansion in the number of sites planned across the province.** These CTS sites are a form of low-barrier resources that strengthen ties to community-based agencies. They ensure easier access for clients and better wraparound supports which are needed now more than ever. With people dying at an alarming rate, limiting the options available for individuals will result in more people at risk, increased harms, and a higher rate of overdose deaths.

To support clients experiencing challenges with their opioid use, CMHA branches across the province have either expanded their own programming and services or created partnerships with other community mental health and addictions organizations, to meet the growing needs. For example:

- CMHA Middlesex offers a Rapid Access to Addictions Medicine (RAAM) clinic in partnership with Addiction Services Thames Valley, providing opioid replacement therapy to individuals with Opioid Use Disorder.
- CMHA Muskoka Parry Sound has been working toward creating its own RAAM clinic, which is scheduled to be open to clients early in the new year.
- CMHA Simcoe County offers an opioid counselling treatment program to anyone concerned about their use of opioids. The CMHA branch has almost seven full-time staff providing counselling and carry a caseload of approximately 200 clients at any given time. With wraparound services in mind, the branch has also created a close partnership with the RAAM clinic nearby, to provide a warm transfer without any waitlists for their clients.
- CMHA Peel-Dufferin offers RAAM Clinics at five sites across their region, supporting one of the largest populated municipalities in Ontario.

- Taking a different approach, two of our branches, CMHA Brant-Haldimand-Norfolk and CMHA Kenora, are currently in the process of working with community partners in applying for CTS sites in their respective communities.

From a provincial perspective, as part of the larger initiative to help fight opioid overdoses, CMHA Ontario has developed [Reducing Harms: Recognizing and Responding to Opioid Overdoses in Your Organization](#), an easy-to-understand resource which takes a harm-reduction approach to the opioid epidemic in Ontario. This resource offers an overview of the current situation in Ontario related to opioids, naloxone, and opioid-related emergencies, including definitions and facts; explanations of symptoms and who may be at-risk of an opioid overdose; information about where to get naloxone and instructions about how to use it; information about caring for an individual after they receive naloxone; information about supporting employees in the aftermath of an opioid emergency; as well as considerations about implementing a naloxone-delivery policy, including myth-busting information about naloxone administration.

Canadian Mental Health Association Ontario and our branches across the province are pleased to support Bill 116 – *Foundations for Promoting and Protecting Mental Health and Addictions Services Act, 2019*, and we look forward to working in partnership with the Ontario government to implement this legislation.

We would be happy to meet with you to further discuss our recommendations. Please feel free to contact me directly by email at [cquenneville@ontario.cmha.ca](mailto:cquenneville@ontario.cmha.ca) or by phone at 416-920-1355.

Sincerely,



Camille Quenneville  
CEO  
Canadian Mental Health Association, Ontario

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<sup>i</sup> Public Health Ontario (2019). Opioids. Retrieved from <https://www.publichealthontario.ca/en/diseases-and-conditions/mental-illness-substance-use/opioids>

<sup>ii</sup> Statistics Canada. (2019). Causes of death, 2017. Retrieved from <https://www150.statcan.gc.ca/n1/daily-quotidien/190530/dq190530c-eng.htm>

<sup>iii</sup> Public Health Ontario. (2019). Interactive Opioid Tool: Opioid-related morbidity and mortality in Ontario. Retrieved from <https://www.publichealthontario.ca/en/data-and-analysis/substance-use/interactive-opioid-tool>

<sup>iv</sup> Ibid

<sup>v</sup> Zhang, M. (2019). CAMH Addiction Rounds: CAMH's Opioid Overdose Prevention Initiative: What have we accomplished over the past 2 years? Delivered in person at the Centre for Addiction and Mental Health.