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May 9, 2006

Ms. Beth Pieteron
Director General
Drug Strategy and Controlled Substances Programme
Health Canada
123 Slater Street
Ottawa, Ontario, K1A 1B9

Dear Ms. Pieteron,

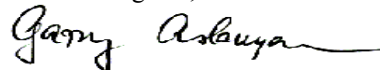
The Ontario Public Health Association (OPHA) wishes to express support for the principles, goals and priorities outlined in the *National Framework for Action to Reduce the Harms Associated with Alcohol and Other Drugs and Substances in Canada*. In addressing harms associated with substance use, the Framework acknowledges the full range of health promotion, prevention, treatment, enforcement and harm reduction approaches.

Problematic substance use is an important public health concern as it is associated with injuries, communicable and chronic diseases, mental health concerns and public safety. It is also an economic issue. In the most recent cost study, the Canadian Centre on Substance Abuse (CCSA) estimated the social cost of substance abuse in Canada to be \$39.8 billion in 2002. Productivity losses amounted to the majority of the cost at \$24.3 billion while health care costs totalled \$8.8 billion and \$5.4 was spent in law enforcement. Tobacco accounted for approximately \$17 billion, alcohol accounted for \$14.6 billion and illicit drugs accounted for \$8.2 billion.

OPHA is in agreement with the principles guiding the Framework which take into account the need for a broad and integrated multi-sectoral approach, addressing social determinants of health, involvement of all stakeholders, and action that is evidence-based and evaluated. The process whereby the issues and priorities were identified for the Framework exemplifies meaningful stakeholder involvement and representation of a range of opinions and concerns related to problematic substance use.

A national Framework provides a strategic approach to address commonly identified priorities facilitating coordination and efficient use of human and economic resources and strengthened action. Fostering joint efforts, the Framework encourages strong partnerships at a variety of levels. In this spirit, OPHA looks forward to playing a role in continued discussions and making contributions in the implementation stages of this Framework.

With kind regards,



Dr. Garry Aslanyan
President

cc: Michel Perron, Canadian Centre on Substance Abuse
cc: Carolyn Franklyn, Canadian Centre on Substance Abuse
cc: Marjorie Ward, Health Canada