

Midtown

Ratepayers Association

To: Paul Dubé, Ontario Ombudsman
Children & Youth Unit
401 Bay Street, Suite 2200
Toronto, ON M5H 2Y4
cy-ej@ombudsman.on.ca

From: Denise Krogman, President, Midtown Ratepayers Association

Re: Request for time-sensitive child endangerment investigation

Dear Sir

I am pleased that the Ontario government has established a dedicated children and youth unit to investigate child protection matters guided by the CYFS Act 2017 and the [United Nations Convention on the Rights of the Child](#).

On the child and youth section of your website under, 'YOUR BASIC RIGHTS' it is stated, 'Under Ontario law, you have the right to feel and be safe'. I imagine this pertains to all children.

With this in mind, please consider this letter to be a **formal request that the Ombudsman's Office investigate whether London Mayor, Ed Holder, and Medical Officer of Health, Dr. Chris Mackie would be endangering thousands of children, by exposing them to open drug dealing and use, and other crime, by putting a drug injection site at 446 York Street. Specifically:**

- approximately 2,000 children attend H.B. Beal Secondary School located 90 metres from the proposed site
- approximately 1000 students attend Catholic Central Secondary School located less than 200 metres from the proposed site

The Thames Valley District School Board is on record opposing this location with the Superintendent stating "we would have foot traffic of kids walking back and forth past the site on an ongoing basis... We don't oppose supervised consumption facilities at all, we just would prefer that they were not adjacent to our schools or nearby our schools." (Source: <https://www.cbc.ca/news/canada/london/london-thames-valley-district-school-board-supervised-consumption-facility-york-street-opposition-1.4657098>)

Injection site users must buy their illicit drugs and bring them to the sites. This causes the area to become a magnet for drug dealers. Open drug use OUTSIDE such facilities is routine (Source: <https://london.ctvnews.ca/overdose-prevention-site-blamed-for-homeless-encampment-but-health-officials-disagree-1.4506302>). This is what occurs outside of the temporary location at 186 King Street. Also, clients are invited to take clean needles with them when they leave. That's why

neighbourhoods with injection sites are typically littered with dirty needles. As far as I can tell, nobody is denying these facts.

The location does not meet Ministry of Health and Long-Term Care Safe Consumption Site criteria. I draw your attention to section 3.2 “Proximity to Parks, Schools and Child Care Centres,” which is a clear acknowledgement by the Province that kids and drugs don’t mix. http://health.gov.on.ca/en/pro/programs/opioids/docs/CTS_application_guide_en.pdf

Public Safety Canada reports a direct link between neighbourhood crime and safe consumption sites. This is because the average addict must steal close to \$350,000 in property a year to get \$35,000 in cash to purchase drugs. Source: <https://www.publicsafety.gc.ca/lbrr/archives/cn63305108-eng.pdf>

The Ontario Association of Chiefs of Police has similar findings: <http://www.oacp.on.ca/Userfiles/Files/NewAndEvents/PublicResourceDocuments/Supervised%20Injection%20Paper%20Feb2012%20FINAL.pdf>

The City of London also acknowledges the problem in its policies: <https://www.london.ca/city-hall/city-council/AZ%20Documents/Siting%20of%20Safe%20Consumption%20Facilities%20and%20Temporary%20Overdose%20Prevention%20Sites%20in%20London.pdf> .

I draw your attention to 4.1.2. Location Criteria to Avoid Land Use Conflicts:

Supervised consumption facilities should be sited in a location that is:

- Separated from busy commercial areas or active public spaces that could generate
- conflicts between the general public and those leaving these facilities after
- consuming
- Separated from parks
- Separated from key pedestrian corridors in the Core Area
- **Separated from public elementary or secondary school properties**
- Separated from municipal pools, arenas, community centres and the Western Fairgrounds
- Not within the interior of a residential neighbourhood

Finally, the City of London recently issued a ‘Core Area Action Plan’ which details problems created by the escalating drug situation in downtown London: <https://pub-london.escribemeetings.com/filestream.ashx?DocumentId=68274>:

“Needles, feces, urine and garbage are often left present in storefronts and other areas that customers are exposed to....Unpredictable and threatening behaviour is losing customers and employees for Core Area businesses.”

Here’s one of the Action Plan’s solutions to the problem:

53. Open permanent supervised consumption facility inappropriate location and close existing temporary facility Council has established Official Plan policies and specific zoning to plan for supervised consumption facilities in London. These policies direct such facilities to locations that are accessible for those who will use them (people suffering from addictions) and where they are removed from busy commercial areas that are more likely to generate conflicts with business owners, customers, tourists and employees....

In other words, to avoid conflicts with customers, business owners, tourists and employees, the City will move the site to a place where it will be in immediate conflict with customers, business owners, employees, residential property owners and over 3,000 school children.

Even preliminary research into what happens to neighbourhoods surrounding injection sites (Calgary, Lethbridge, Ottawa, Toronto, etc.) tells us that society must protect children from exposure to these facilities. By way of example, I have provided links to just two Toronto news articles.

<https://toronto.ctvnews.ca/councillor-says-safe-injection-sites-enable-dangerous-behaviour-1.3948847>

<https://www.thestar.com/news/gta/2018/08/15/do-supervised-injection-sites-bring-crime-and-disorder-advocates-and-residents-disagree.html>

As President of the Midtown Ratepayers Association, I can tell you that my entire neighbourhood, which has a large residential population including children and other vulnerable people, are terribly worried about what Mayor Ed Holder and Dr. Chris Mackie have in mind. Hundreds of us have been inundating the Ministry of Health's Minister's Office and the Premier's Office with emails and letters, asking for help.

I can't explain why our Mayor and local Chief Medical Officer of Health are ignoring our concerns. **Could it be that it is because ours is a blue-collar neighbourhood and we are less valued as citizens?** We realize addicted people need help but we can't agree that this should happen at the expense of our children's safety and security.

Thank you for your consideration in this matter and please advise me as to next steps with regards to an Ombudsman's Office investigation at your earliest convenience.

Sincerely

Denise Krogman, President
Midtown Ratepayers Association