



Public Health Association of British Columbia  
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The Honourable Robert Douglas Nicholson  
Minister of Justice and Attorney General of Canada  
284 Wellington Street  
Ottawa, ON K1A 0H8

April 18, 2012

Dear Sir,

I am writing to you as President of the Public Health Association of BC. The Association is a non-profit organization whose mission is to promote the public's health by working to strengthen disease and injury prevention, health promotion, health protection and healthy public policy. We fulfill our mission through education, advocacy and networking.

I am writing in regard to Bill C-10, The Safe Streets and Communities Bill. PHABC has considerable concern about the purpose and impact of this legislation. As well, we believe that it fails to adequately recognize the importance of violence prevention and that a government initiative is needed in this regard.

The Association believes the legislation has no clear focus and fails to address the important aspects of prevention and education. Many of the issues the legislation purports to address are associated with addictions and it in fact criminalizes a health issue. The legislation should recognize harm reduction as a valid public policy response to addressing criminal behaviours.

Violence prevention should also be a centre piece of government policy. The World Health organization document *Preventing Violence: A guide to implementing the recommendations of the World report on violence and health* (WHO, 2004) provides a framework for a national plan of action. The health sector bears a huge burden of providing care to the victims of violence. It is far more economical to prevent violence than to pay for its consequences. It is also much more compassionate to decrease the burden of suffering on victims, families and communities. Promoting physical and mental wellbeing and treating mental illness and substance abuse are critical aspects of a comprehensive approach. Lack of proper housing, employment and social services are also important factors to prevent violence and reduce crime.

Given that your government seems to be committed to the approach set out in the Safe Streets and Communities Bill, I would ask you to consider ways to address the concerns I have raised in the implementation process. I would ask you to create ways for concerned organizations to provide input into implementation, especially to assist in identifying and mitigating negative impacts as well as initiating companion work such as violence prevention.

Please advise if there will be opportunities for further consultation.

Sincerely,

Marjorie MacDonald  
President