Dr Tedros Adhanom Ghebreyesus, WHO Director-General Mr Yury Fedotov, UNODC Executive Director

Open letter on the UNODC/WHO International Standards for the Treatment of Drug Use Disorders

Dear Sirs,

We, the undersigned civil society organisations working at the national, regional and international level on issues related to drug use, drug treatment, harm reduction and drug policies, are writing to you today regarding the joint UNODC and WHO publication entitled *International Standards for the Treatment of Drug Use Disorders*.

The 'Draft for Field Testing' of this document (March 2017) raises serious concerns and contains significant omissions and misrepresentations. We request your urgent action to prevent these Standards being released in their current state. Three areas are of particular concern.

1. Stigmatizing and uncited assertions

The current document falls far short of the standard we expect from normative guidance from the UN. Stigmatizing and pathologizing language is used throughout the Standards to refer to people who use drugs, without citation and with claims that go well beyond the evidence base. These statements are particularly inappropriate given the document's emphasis on the need for ethical standards in treatment and for non-discriminatory approaches. Uncited and unsubstantiated statements throughout the document are vague, unhelpful, and value laden. Examples include:

- drug treatment helps to "normalize brain functioning" (Page 1);
- people with drug use disorders "often lose interest in and neglect their family and social life, education, work and recreation" (Page 2);
- "The scientific community now has a complex understanding of how these disruptions in brain functioning result in the development of drug use disorders" (Page 3);
- "abnormal brain functioning in affected individuals predisposes them to make decisions with disastrous consequences to their own health and well-being" (Page 3);
- "the majority of pregnant women with a drug use disorder have few if any parenting skills, and may lack basic knowledge about child development and childrearing" (Page 62).

2. Lack of meaningful inclusion of people who use drugs in review

The acknowledgements section of the document, and the experience of several signatories on this letter, appears to demonstrate that the development of these Standards has failed to meaningfully include people who use drugs. This is contrary to established best practice from both WHO and UNODC. We understand that peers were invited to recent consultations, and that the International Network of People who Use Drugs was able to provide comments, but were told that changes were problematic as the text had to closely follow the Principles agreed to by member states.

This seems more like meaningless review rather than meaningful engagement, and given the weakness of the document, is deeply concerning. In the spirit of 'Nothing About Us Without Us', the

meaningful engagement of people who use drugs is essential precisely to identify the kinds of problems that the current draft will exacerbate. Without input from those directly affected, the validity of these Standards will be called into question.

3. Lack of mention of harm reduction or key health interventions for people who inject drugs

It is striking and alarming that, despite multiple publications from and assertions by your agencies that you acknowledge the central role that harm reduction plays in drugs services, this document does not contain either the phrase or reference to important interventions such as heroin assisted treatment or drug consumption rooms. Failure to mention harm reduction explicitly is at odds with your own guides and practice: for example, the WHO, UNODC, UNAIDS Technical Guide for Countries to Set Targets for Universal Access to HIV Prevention, Treatment and Care for Injecting Drug Users (2012) cites a comprehensive package of interventions "commonly referred to as a harm reduction approach". The WHO Consolidated Guidelines on HIV Prevention, Diagnosis, Treatment and Care for Key Populations (2014) makes numerous explicit references to, and recommendations on, harm reduction — as does the multi-agency Implementing Comprehensive HIV and HCV Programmes with People Who Inject Drugs (2017) toolkit that was co-produced by UNODC and the International Network of People who Use Drugs, among others. Given the recognized importance of integrating HIV, hepatitis C and drug dependence treatment services, and the purported interest in and reference to the overdose crisis, it is incomprehensible that the Draft Field Guide would not include these references.

The document places an unbalanced emphasis on abstinence-based treatment models and "recovery". The draft Standards elevate the status of naltrexone and present it on a par with far more established and proven treatments such as methadone and buprenorphine. At the same time, heroin assisted treatment is not mentioned at all, despite significant peer-reviewed and published evidence.

Urgent action needed

In line with the other submissions you have received about the draft Standards – from the International Network of People who Use Drugs, from CoAct, and from the UN Strategic Advisory Group on HIV and Drug Use – we are concerned that the document is as reflective of political biases as of the evidence-base. This is not work that meets the standards of Standards, and we call on you to postpone the release or future dissemination of the document until these shortcomings are appropriately addressed. We trust that we have your support and understanding on this important issue and look forward to hearing from you on the action being taken to address the concerns noted above.

Yours sincerely,

1.	AAFNO NEPAL	9.	AK Pharmacy & Naturopathy Center
2.	Acción técnica social (ATS) (Colombia)		(Malaysia)
3.	Action Against AIDS Germany	10.	AKSION PLUS (Albania)
4.	AFEW International (Netherlands)	11.	Akzept (Germany)
5.	Agência Piaget para o Desenvolvimento	12.	Alcohol and Drug Foundation (Australia)
	(APDES) (Portugal)	13.	Alliance for Public Health (Ukraine)
6.	AIDES (France)	14.	Alliance National des Consommateurs et
7.	Aids & Rights Alliance for Southern Africa		de l'Environnement (ANCE-Togo)
	(ARASA) (South Africa)	15.	Anandamide Gardens (Colombia)
8.	Aidsfonds (Netherlands)	16.	Andrey Rylkov Foundation for Health and
			Social Justice (Russia)

	Network	47.	Correlation Network (Netherlands)
18.	Anti-prohibitionist Feminists Latin	48.	Dejusticia (Colombia)
	American and Caribbean Network	49.	Diogenis (Greece)
19.	Anyone's Child Belgium	50.	Drug Policy Advocacy Group (DPAG)
20.	Apoyo Positivo (Spain)		(Myanmar)
21.	ARAS - Romanian Association Against AIDS	51.	Drug Policy Alliance (USA)
22.	Asian Harm Reduction Network (AHRN)	52.	Društvo AREAL (Slovenia)
23.	Asian Network of People who Use Drugs	53.	Drustvo SKUC (Slovenia)
	(ANPUD)	54.	DUNE asbl (Belgium)
24.	Asociación Costarricense para el Estudio e	55.	EQUIS Justicia para las Mujeres (Mexico)
۷٦.	Intervención en Drogas (ACEID) (Costa	56.	Estonian Network of People living with
	Rica)	50.	HIV
25.	Asociación Pensamiento Penal (Argentina)	57.	Eurasian Harm Reduction Association
25. 26.	Association de Lutte Contre le Sida (ALCS)	57.	(EHRA)
20.	(Morocco)	58.	Eurasian Key Populations Health Network
27		56.	
27.	Association for Humane Drug Policy	Ε0	(EKPHN)
20	(Norway)	59.	Eurasian Network of People Who Use
28.	Association for Safer Drug Policies	60	Drugs (ENPUD)
20	(Norway)	60.	European AIDS Treatment Group (EATG)
29.	NGO "Baltic HIV Association"	61.	European Network of People who Use
30.	Blenheim (UK)		Drugs (EuroNPUD)
31.	Brazilian Harm Reduction Association	62.	Faith and life - Uzbekistan
	(ABORDA)	63.	Federación Andaluza ENLACE (Spain)
32.	Canadian HIV/AIDS Legal Network	64.	Federation Addiction (France)
33.	Caribbean Vulnerable Communities	65.	Fields of Green for ALL (South Africa)
	Coalition (CVC)	66.	Fondo de Ayuda Toxicológica (FAT)
34.	Caritable Foundation (Russia)		(Argentina)
35.	Center for Harm Reduction Therapy	67.	Forum Droghe (Italy)
	(United States)	68.	Foundation Against Illicit Drugs and Child
36.	Center for Studies on Public Security and		Abuse (FADCA) (Liberia)
	Citizenship – CESeC (Brazil)	69.	Fundación Atenea (Spain)
37.	Centro Cáritas de Formación para la	70.	Georgian Network People who Use Drugs
	Atención de las Farmacodependencias y		(GENPUD)
	Situaciones Críticas Asociadas A.C.	71.	Girl Inspiration Group (Zambia)
	(CAFAC) (Mexico)	72.	Global Exchange (USA)
38.	Child Welfare Organizing Project (CWOP)	73.	Global Research Institute (GLORI)
	(United States)		(Kyrgyzstan)
39.	Chilean Harm Reduction Network	74.	Greek PeNUPS
40.	Citywide Drugs Crisis Campaign (Ireland)	75.	Grupo de Ativistas em Tratamentos (GAT)
41.	Coalition des réseaux et associations		(Portugal)
	burkinabè de lutte contre le VIH/Sida et	76.	Grupo de Trabajo sobre Tratamientos del
	de promotion de la santé (CORAB)		VIH (gTt-VIH) (Spain)
	(Burkina Faso)	77.	Harm Reduction Coalition (HRC) (USA)
42.	Coalition on Positive Health	78.	Harm Reduction International (HRI) (UK)
	Empowerment (United States)	79.	Harm Reduction Network Kyrgyzstan
43.	Coalition PLUS (Senegal)	80.	Help Not Handcuffs (USA)
44.	Community Reference Group-CRG	81.	Help Not Harm (Ireland)
	(Myanmar)	82.	HIV Ireland
45.	Community-led Organization of Positive	83.	Biedrība Apvienība HIV.LV (Latvia)
	People Who Use Drugs in Nepal		
	,		

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Corporación Consentidos (Colombia)

17.

Anti-prohibitionist Feminists Brazilian

04.	nors - nearthy options project skopje	110.	Mauritian Network of people who use
	(Macedonia)		drugs (MauNPUD)
85.	IHP - International HIV Partnerships (UK)	117.	Médecins du Monde (France)
86.	Hungarian Civil Liberties Union	118.	Mexico Unido Contra la Delincuencia
87.	Iglesia Evangélica Protestante De El		(MUCD)
	Salvador (IEPES)	119.	Middle East and North African Harm
88.	INDEPAZ-Colombia		Reduction Network (MENAHRA)
89.	Initiative group of people who use drugs, Odessa, Ukraine	120.	Middle East and North Africa Network of/for people who use Drugs
90.	Intan Life Zone Welfare Society (Malaysia)		(MENANPUD)
91.	Intercambios Asociación Civil (Argentina)	121.	MODUS VIVENDI asbl (Belgium)
92.	International Centre for Science in Drug	122.	National Advocates for Pregnant Women
	Policy (ICSDP) (Canada)		(NAPW) (USA)
93.	International Civil Society Support	123.	Netherlands Drug Policy Foundation
	(Netherlands)	124.	New Zealand Needle Exchange
94.	International Doctors for Healthy Drug		Programme (NZNEP)
	Policies (IDHDP) (UK)	125.	NSW Users and AIDS Association (NUAA)
95.	International Drug Policy Consortium	106	(Australia)
	(IDPC) (UK)	126.	OpStap (Belgium)
96.	International Harm Reduction	127.	ORFED (Mali)
	Development Program (IHRD), Open Society Foundations (USA)	128.	Osons Parler de la Drogue au Mali (OPDM)
97.	International HIV/AIDS Alliance (UK)	129.	Paramos fondas RIGRA (Lithuania)
98.	International Network of People Who Use	130.	Paroles Autour de la Santé - Guadeloupe
	Drugs (INPUD) (UK)	131.	Paroles Autour de la Santé - Ivory Coast
99.	Italian Coalition for Civil Liberties and	132.	Paroles Autour de la Santé - Mali
	Rights	133.	Penal Reform International (PRI) (UK)
100.	Jakarta Drugs and AIDS Community (Indonesia)	134.	Peoples Harm Reduction Alliance (PHRA) (USA)
101.	Kelab Sahabat Meta (Malaysia)	135.	Persaudaraan Korban Napza Bandung
102.	Kenedougou Solidarité (Mali)		(PKNB) (Indonesia)
103.	Kuala Lumpur AIDS Support Services	136.	Persaudaraan Korban Napza Indonesia
	Society (KLASS) (Malaysia)		(PKNI) (Indonesia)
104.	La Società della Ragione ONLUS (Italy)	137.	Philadelphia Overdose Prevention
105.	Lambeth Service User Council (LSUC) (UK)		Initiative (POPI) (USA)
106.	Law Enforcement and HIV Network	138.	Plug-INN (Belgium)
	(LEAHN) (Australia)	139.	PO "ALLIANCE.GLOBAL"(Ukraine)
107.	Centre for Law Enforcement and Public	140.	Positive Voice, Greece
	Health (CLEPH) (Australia)	141.	Positive Women Inc. (New Zealand)
108.	Leader Initiative group of people who use	142.	PRAKSIS (Greece)
	drugs "S-Team" (Ukraine)	143.	Radanar Ayar Rural Development
109.	Liaison Antiprohibitionniste (Belgium)		Association (Myanmar)
110.	LILA - Italian League for the Fight against	144.	RECOVERING NEPAL
	AIDS	145.	Red Umbrella Athens (Greece)
111.	LUNA Social Assistance Center (Russia)	146.	Rede Brasileira de Redução e Danos e
112.	LUNEST (Estonia)		Direitos Humano (REDUC) (Brazil)
113.	Mainline (Netherlands)	147.	RELEASE (UK)
114.	Maison des Associations de lutte contre le	148.	Réseau national pour une grande
	Sida et la Drogue (MASD) (Burkina Faso)		implication des personnes infectées par le
115.	Malaysian AIDS Council (MAC)		VIH/SIDA au Burkina Faso (REGIPIV)
		149.	Resetas (Lithuania)

116.

Mauritian Network of people who use

84.

HOPS - Healthy options project Skopje

150.	RSPA "Your Chance" (Belarus)
151.	Rubikon (Georgia)
152.	Salamander Trust (UK)
153.	Scottish Drugs Forum (SDF)
154.	Senegalese Association for the Reduction
	of Infectious Harms (ASRDR)
155.	Substance Misuse Management Good
	Practice (SMMGP) (UK)
156.	Social Drug Policy Initiative (SIN) (Poland)
157.	Social Watch Bénin
158.	Society for Promotion of Youth and
	Masses (SPYM) (India)
159.	SOMOSGAY (Paraguay)
160.	SOS Pairs Éducateurs (Mauritania)
161.	StoptheDrugWar.org (USA)
162.	Straathoekwerk vlaanderen (Netherlands)
163.	Students for Sensible Drug Policy (SSDP)
	(USA)
164.	Stronger Together, Association for Support
	of People Living with HIV (FYROM)
165.	Tendo's World (Uganda)
166.	The Beckley Foundation (UK)
167.	The Global Network of People Living with
	HIV (GNP+) (Netherlands)
168.	The Hepatitis C Mentor & Support Group
	(HCMSG) (USA)
169.	Transform Drug Policy Foundation (UK)
170.	Transnational Institute - Drugs &
	Democracy Programme (Netherlands)
171.	Treatment Action Group (TAG) (USA)
172.	Tukikohta ry (Finland)
173.	Ukrainian Network People who Use Drugs
174.	Union Contre la Co-infection
	VIH/Hépatites/Tuberculose (UNICO) (Ivory
	Coast)
175.	Unión de Asociaciones y Entidades de
	Atención al Drogodependiente (UNAD)
	(Spain)
176.	Union for Improved Services
	Communications (UISCE) (Ireland)
177.	Univers Santé (Belgium)
178.	Urban Survivors Union (USU) (USA)
179.	VISION e.V. (Germany)
180.	VOCAL-NY (USA)
181.	West Africa Drug Policy Network
	(WADPN)
182.	WHRN - Western (India) Harm Reduction
	Network
183.	Washington Office on Latin America (USA)
101	Woman and Harm Reduction

Women and Harm Reduction International Network (WHRIN)

World Hepatitis Alliance (UK)

184.

185.

- 186. Youth Organisations for Drug Action (YODA) (Poland)
- 187. YouthRISE Nigeria
- 188. Zimbabwe Civil Liberties and Drug Network Network (ZCLDN)