

8 March 2018

Dr Tedros Adhanom Ghebreyesus, WHO Director-General  
Mr Yuri 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,

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

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

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|------|---|------|---|
| 84.  | HOPS - Healthy options project Skopje (Macedonia)                                       | 116. | Mauritian Network of people who use drugs (MauNPUD)   |
| 85.  | IHP - International HIV Partnerships (UK)   | 117. | Médecins du Monde (France)  |
| 86.  | Hungarian Civil Liberties Union   | 118. | Mexico Unido Contra la Delincuencia (MUCD)  |
| 87.  | Iglesia Evangélica Protestante De El Salvador (IEPES)                                   | 119. | Middle East and North African Harm Reduction Network (MENAHR)   |
| 88.  | INDEPAZ-Colombia  | 120. | Middle East and North Africa Network of/for people who use Drugs (MENANPUD)                                   |
| 89.  | Initiative group of people who use drugs, Odessa, Ukraine                               | 121. | MODUS VIVENDI asbl (Belgium)  |
| 90.  | Intan Life Zone Welfare Society (Malaysia)  | 122. | National Advocates for Pregnant Women (NAPW) (USA)  |
| 91.  | Intercambios Asociación Civil (Argentina)   | 123. | Netherlands Drug Policy Foundation  |
| 92.  | International Centre for Science in Drug Policy (ICSDP) (Canada)                        | 124. | New Zealand Needle Exchange Programme (NZNEP)   |
| 93.  | International Civil Society Support (Netherlands)                                       | 125. | NSW Users and AIDS Association (NUAA) (Australia)   |
| 94.  | International Doctors for Healthy Drug Policies (IDHDP) (UK)                            | 126. | OpStap (Belgium)  |
| 95.  | International Drug Policy Consortium (IDPC) (UK)  | 127. | ORFED (Mali)  |
| 96.  | International Harm Reduction 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 Drugs (INPUD) (UK)                              | 130. | Paroles Autour de la Santé - Guadeloupe   |
| 99.  | Italian Coalition for Civil Liberties and Rights  | 131. | Paroles Autour de la Santé - Ivory Coast  |
| 100. | Jakarta Drugs and AIDS Community (Indonesia)  | 132. | Paroles Autour de la Santé - Mali   |
| 101. | Kelab Sahabat Meta (Malaysia)   | 133. | Penal Reform International (PRI) (UK)   |
| 102. | Kenedougou Solidarité (Mali)  | 134. | Peoples Harm Reduction Alliance (PHRA) (USA)  |
| 103. | Kuala Lumpur AIDS Support Services Society (KLASS) (Malaysia)                           | 135. | Persaudaraan Korban Napza Bandung (PKNB) (Indonesia)  |
| 104. | La Società della Ragione ONLUS (Italy)  | 136. | Persaudaraan Korban Napza Indonesia (PKNI) (Indonesia)  |
| 105. | Lambeth Service User Council (LSUC) (UK)  | 137. | Philadelphia Overdose Prevention Initiative (POPI) (USA)  |
| 106. | Law Enforcement and HIV Network (LEAHN) (Australia)                                     | 138. | Plug-INN (Belgium)  |
| 107. | Centre for Law Enforcement and Public Health (CLEPH) (Australia)                        | 139. | PO "ALLIANCE.GLOBAL"(Ukraine)   |
| 108. | Leader Initiative group of people who use drugs "S-Team" (Ukraine)                      | 140. | Positive Voice, Greece  |
| 109. | Liaison Antiprohibitionniste (Belgium)  | 141. | Positive Women Inc. (New Zealand)   |
| 110. | LILA - Italian League for the Fight against AIDS  | 142. | PRAKSIS (Greece)  |
| 111. | LUNA Social Assistance Center (Russia)  | 143. | Radanar Ayar Rural Development Association (Myanmar)  |
| 112. | LUNEST (Estonia)  | 144. | RECOVERING NEPAL  |
| 113. | Mainline (Netherlands)  | 145. | Red Umbrella Athens (Greece)  |
| 114. | Maison des Associations de lutte contre le Sida et la Drogue (MASD) (Burkina Faso)      | 146. | Rede Brasileira de Redução e Danos e Direitos Humano (REDUC) (Brazil)   |
| 115. | Malaysian AIDS Council (MAC)  | 147. | RELEASE (UK)  |
|      |   | 148. | Réseau national pour une grande implication des personnes infectées par le VIH/SIDA au Burkina Faso (REGIPIV) |
|      |   | 149. | Resetas (Lithuania)   |

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 (HCMMSG) (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)
184. Women and Harm Reduction International Network (WHRIN)
185. World Hepatitis Alliance (UK)
186. Youth Organisations for Drug Action (YODA) (Poland)
187. YouthRISE Nigeria
188. Zimbabwe Civil Liberties and Drug Network Network (ZCLDN)