



EUROPEAN CITIES AGAINST DRUGS

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From: European Cities Against Drugs
(ECAD)
To: European Commission
Subject: EU drugs strategy 2005-2012

ECAD views on priorities and actions to be amended and/or included in the EU Action Plan on Drugs 2005 – 2008

1. In Cordroque 53 it is stated (p.1), “ *It [the new drugs strategy] aims to protect and improve the well-being of society and of the individual, to offer a high level of security for the general public and to take a balanced, integrated approach to the drugs problem.*”
 - a. Whilst referring to the UN General Assembly Special Session on Drugs (UNGASS) 1998 (p.2), stating that UNGASS “*confirmed the importance of the integrated and balanced approach, in which supply reduction and demand reduction are mutually reinforcing elements in drugs policy*”, we find it strange that only paragraph 2 of the UNGASS Political Declaration is quoted, where the States Members of the United Nations “*recognize that action against the world drug problem is a common and shared responsibility requiring an integrated and balanced approach...*” (UNGASS Political Declaration paragraph 2), and at the same time an extremely important paragraph of the same document is omitted.
 - b. Paragraph 19 of the UNGASS Political Declaration states that [We the States Members of the United Nations] “*Welcome the global approach by the United Nations International Drug Control Programme to the elimination of illicit crops and commit ourselves to working closely with the Programme to develop strategies with a view to eliminating or reducing significantly the illicit cultivation of the coca bush, the cannabis plant and the opium poppy by the year 2008. We affirm our determination to mobilize international support for our efforts to achieve these goals.*” The future drugs strategy should refer to this commitment unanimously agreed upon at UNGASS in 1998.



2. In Cordroque 53 it is stated (p.2) that ***“The Strategy bears in mind the relevant international conventions. The UN Single Convention on Narcotic Drugs (1961), the Convention on Psychotropic Substances (1971) and the Convention against the Illicit Traffic in Narcotic Drugs and Psychotropic Substances (1988) are major legal instruments for controlling the availability of narcotic drugs.”***
 - a. This is true, however the drugs strategy should also contain reference to Article 33 of the 1989 Convention on the Rights of the Child, which puts specific stress on the importance to protect children from the use of illicit drugs and psychotropic substances. Article 33 of the Conventions on the Rights of the Child reads, *“States Parties shall take all appropriate measures, including legislative, administrative, social and educational measures, to protect children from the illicit use of narcotic drugs and psychotropic substances as defined in the relevant international treaties, and to prevent the use of children in the illicit production and trafficking of such substances.”*
3. ECAD notes that ***“The Strategy is also intended to allow scope for local, regional, national and transnational dynamics and potentialities. Account is also taken of the organisational and financial constraints of Member States and EU institutions.”***
 - a. This clearly indicates that there will not necessarily be a common EU drugs policy, leaving it up to Member States to engage in *“local, regional, national and transnational dynamics and potentialities.”* The use of the wording ‘transnational dynamics and potentialities’ should be omitted and substituted for by something more specific as ‘transnational dynamics and potentialities’ could mean anything appealing in the eye of the beholder.
4. The Council has identified two general aims with regard to drugs (pp. 2-3) – **1.To contribute “to the attainment of a high level of health protection, well-being and social cohesion by complementing the Member States’ action in reducing drug-related health damage, including information and prevention”, and 2. “To ensure a high level of security for the general public by taking action against large-scale production, cross-border trafficking in drugs and diversion of precursors, and by intensifying preventive action against drug-related crime, through effective cooperation embedded in a joint approach.”**
 - a. The two general aims mentioned above lack two important items that should be added. 1. To contribute to the attainment of a high level of health protection, well- being and social cohesion, the Drugs Strategy should make it clear that the EU also aims at fighting personal use of drugs as part of efforts to achieve the above objectives. 2. Furthermore, to ensure a high level of security for the general public there is not only need for action against large-scale drugs production, cross-border trafficking in drugs and diversion of precursors and preventive action against drug-related crime, but also need for effective cooperation in a joint approach to fight small-scale production and dealing of drugs on street level.
5. ECAD notes with satisfaction that a balanced approach to the drugs problem requires adequate consultation of the relevant NGOs. Being Europe’s largest organisation in favour of a drug free society rather than a free drug society, ECAD is looking forward to being intensely involved in drawing up action plans for consideration by the Council for the 2005-2007 and 2009-2011 periods.
6. ECAD notes with satisfaction that actions at EU level must state intended results in advance and that actions must offer clear added value and that their results must be measurable and realistic.

7. Even if the Strategy also is intended to allow scope for local, regional and national actions, ECAD notes with satisfaction the demand to improve the present poor coordination on issues where coordination, without creating new institutions, is of great importance, e.g. international cooperation.
8. **As pointed out in Cordroque 53 (p.6), prevention is to be preferred to treatment, treatment is to be preferred to harm reduction and harm reduction is to be preferred to doing nothing.**
 - a. ECAD notes with worry, an increasing tendency in some Member States to medicalize the drug problem through mass distribution of syringes, methadone and buprenorphine and, even worse, of heroin. Even if account must be taken of the organisational and financial constraints of Member States and EU institutions, it is of utmost importance not only to improve a high level of health protection but also to improve access to good quality schools, a functioning labour market and adequate housing facilities. Young people without education and/or a job combined with poor prospects for the future are definitely running a greater risk of being involved in drugs. It should be kept in mind that societal problems usually result in increasing drug problems in the same way as drug problems usually result in societal problems.
 - b. To avoid confusion, it should be made clear that harm reduction is not the same as prevention. Harm reduction is what you resort to when preventive efforts have failed.
9. **In §4 Policy field: supply reduction** too much emphasis is put on forms for co-operation rather than the contents.
 - a. The Action Plans targeting supply reduction must be very specific to make it possible to measure whether intended results have been cost-effective and achieved within the stated timeframe.
10. **Cross-cutting theme: international cooperation**
 - a. As mentioned earlier, the contents of paragraph 19 of the UNGASS Political Declaration and the contents of the 1989 UN Convention of the Rights of the Child, especially article 33 should be included and stressed in the Drugs Strategy if the global nature of the drugs problem is to be taken seriously and if the EU aims to expand its political influence on drug related issues internationally.
11. **Cross-cutting theme: information and evaluation**
 - a. Information should advocate non-use of illicit drugs. Courses and/or information on alleged 'safe use' is snake oil prevention and should be omitted completely as there is no such thing as 'safe use' of illicit drugs. Testing of MDMA pills at raves, acceptance of use of smaller amounts of drugs, injection rooms, and mass distribution of syringes to mention a few examples could condone drug use and should therefore be reconsidered as good examples of an integrated and balanced approach to the drug problem.
12. **Facing drug production and drug promotion problems within the European Union**
 - a. Nowhere has there been any specific mentioning of the importance of fighting drug production within the European Union. The EU Drugs Strategy 2005-2012 provides a historic possibility to start work to close down coffee shops in the Netherlands, to initiate efforts to terminate ecstasy production in the same country as well as drug production in Belgium and Poland to mention a few examples. Recent, successful efforts to destroy sale of cannabis products, totalling an estimated 500 million Danish crowns per annum in Christiania in Copenhagen, could serve as an example for similar efforts in other countries faced with open markets for sale of drugs.