



**Community-Led Compassion Clubs**  
**The Logical Next Step in Harm Reduction**



*This information pamphlet was written on the stolen land of the Coast Salish Peoples, including the territories of the xwməθkwəy̓əm (Musqueam), Skwxwú7mesh (Squamish), and Səl'ílwatał (Tseil-Waututh) Nations.*

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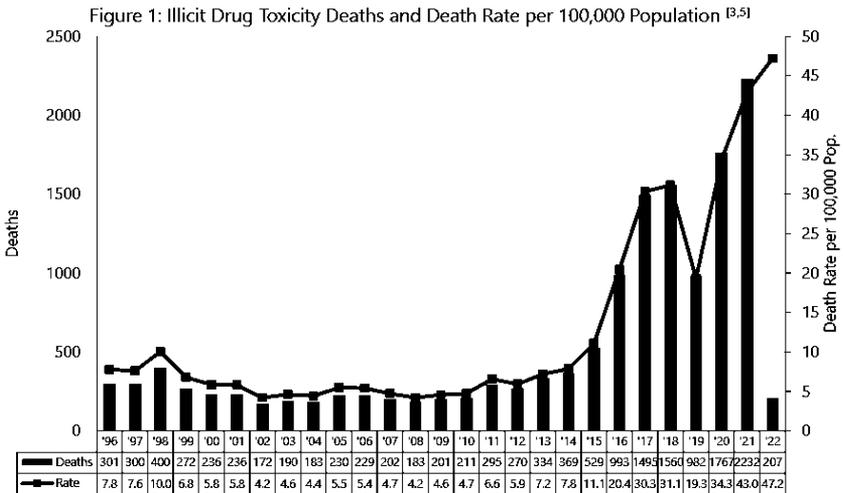
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# Who is the Drug User Liberation Front?

Formed in response to the ever-mounting overdose deaths in British Columbia and across Canada, the Drug User Liberation Front looks to provide tangible solutions to the devastating crisis caused by prohibition. We are an organized collective of people who use drugs empowered to make change through direct action, courage and conviction, and fueled by the memories of the countless friends, families, and loved ones whose lives have been taken by an unjust, broken system of laws and policies.

BC Coroners Service

Illicit Drug Toxicity Deaths in BC  
January 1, 2012 to January 31, 2022



## Our Position on Regulated Supply

*Regulated Supply* – Substance of known potency and content, provided in a way to people who use drugs in a way that is accessible and accurately conveys the risks of the substance.

*Compassion Club* – A space where drug users can access currently illegal narcotics, such that they know the exact dose and content of what they are taking, and where they can be connected with other services.

DULF's argument:

1. The volatility and unpredictability of the illegal drug supply is killing people;
2. Providing drug users with non-toxic drugs vastly lowers the death rate;
3. Barriers to accessing safe drugs cause people to turn back to risky street drugs;
4. Prohibition doesn't work;
5. The DULF Fulfillment Center and Compassion Club Model is saving lives right now and will save more if we are permitted to continue our work.

# Driving Factors of Harms and Overdose

## 1. Overarching Policies of Prohibition

- Encourages more potent and addictive substances such as Fentanyl, and Etizolam.<sup>1</sup>
- Requires that people hide their use, lessening their ability to access harm reduction supplies and addiction services.

## 2. Enforcement

- Allows more violent organized criminal forces to dominate the illicit market.<sup>2</sup>

## 3. Variability in Drug Potency and Content

- People do not know what they are taking or how potent it is.
- Data has linked fentanyl variance and concentration to increased overdose deaths in Vancouver.

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<sup>1</sup> L. Beletsky, C.S. Davis, Today's fentanyl crisis: Prohibition's Iron Law, revisited, *International Journal of Drug Policy* (2017), <http://dx.doi.org/10.1016/j.drugpo.2017.05.050>

<sup>2</sup> Werb, D., Rowell, G., Guyatt, G., Kerr, T., Montaner, J., & Wood, E. (2011). Effect of drug law enforcement on drug market violence: A systematic review. *International Journal of Drug Policy*, 22(2), 87–94. <https://doi.org/10.1016/j.drugpo.2011.02.002>

# The Need for a Non-Medical Solution

Doctors and the medical system are part of the problem. The medicalization of drug regulation is ineffective and measures taken to provide “safe supply” in a medicalized context have been deeply flawed. This is largely because:

1. Prescribers do not want to prescribe and do not want to be the gatekeepers to “safe supply”;<sup>3</sup> largely due to bullying by colleagues and fear of their college.<sup>4</sup>
2. Receiving a substance use disorder is harmful to people who have managed or recreational use patterns.<sup>5</sup>
3. Medicalization reduces harm reduction uptake and effectiveness.<sup>6</sup>

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<sup>3</sup> Tyndall, M. (2020). A safer drug supply: A pragmatic and ethical response to the overdose crisis. *CMAJ*, 192(34), E986–E987. <https://doi.org/10.1503/cmaj.201618>

<sup>4</sup> Myhill-Jones, B. J. (2021). RE: A safer drug supply: a pragmatic and ethical response to the overdose crisis. <https://www.cmaj.ca/content/re-safer-drug-supply-pragmatic-and-ethical-response-overdose-crisis-0>

<sup>5</sup> “Discrimination Against Patients With Substance Use Disorders Remains Prevalent And Harmful: The Case For 42 CFR Part 2, ” Health Affairs Blog, April 13, 2017.DOI: 10.1377/hblog20170413.059618

<sup>6</sup> Kolla, G., & Strike, C. (2021). Medicalization under prohibition: The tactics and limits of medicalization in the spaces where people use illicit drugs. *Drugs: Education, Prevention and Policy*, 28(2), 127–137. <https://doi.org/10.1080/09687637.2020.1769029>

# Prohibition Doesn't Work

Prohibition causes a tripartite increase in:

## 1. The potency of drugs.

- More potent drugs are easier to smuggle.

## 2. The toxicity of drugs.

- Deregulation in the market causes the supply chain to be unpredictable.

## 3. The power of organized crime.

- Supply will *always* meet demand and organized criminal gangs will supply drugs if there is no licit supplier.

Alcohol is the most dangerous drug, both to society and the individual, yet it is legal to protect consumers.

You can think of DULF is a ***consumer protection initiative*** (i.e. the FDA for narcotics) for people who use drugs.

## **Why We Cannot Wait**

1. Overdose deaths continue to increase at an alarming rate.
2. Politicians and the general public have proven to be apathetic to the ongoing crisis. If we do not step in to stop the death, no one else will.
3. We are watching new crises develop as a result of an unregulated drug market. (Benzodiazepine contamination, severe and frequent infections, introduction of Carfentanil).

## **DULF Compassion Clubs as a Solution**

A unique approach to compassion clubs:

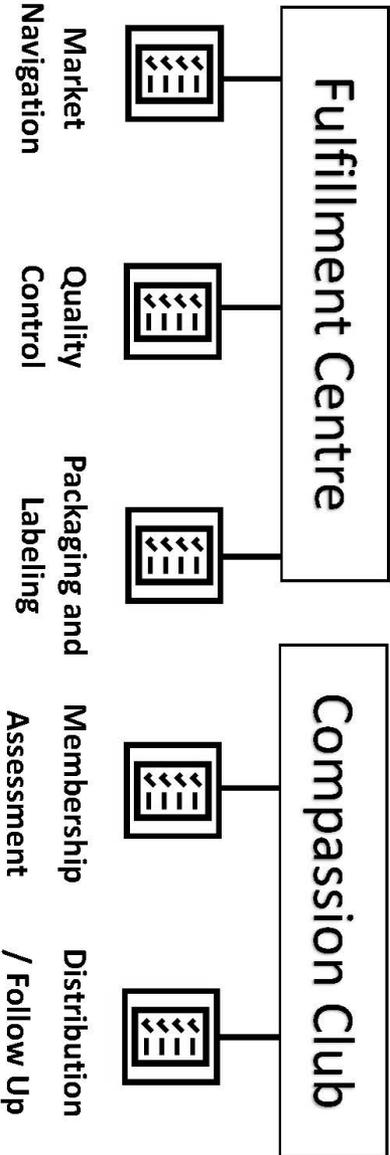
- Integrate into existing lines of substance distribution and increase power of consumers.
- Acquire substances from community and online sources, test the substances, package and accurately label.
- Redistribute to compassion club members in a safe and accountable environment.

# DULF is Uniquely Situated to Intervene

1. Deep and meaningful connections with the provincial network of People Who Use Drugs and local drug user organizations.
2. Technological skills to be able to source substances from the dark web which increases safety and market accountability.
3. We are willing and able to work with all stakeholders to keep people who use drugs alive and healthy, and keep our communities safe.
4. We have demonstrated that we have no desire to profit off this intervention.



# How It Works



## EVALUATION OCCURS THROUGHOUT PROCESS

# Market Navigation

The preferable method to obtain substances for compassion clubs is to purchase pharmaceutical-grade cocaine, heroin and methamphetamine from a properly licensed and regulated producer.

This method is not possible under the current regulatory framework, however, and in the absence of permissions to obtain substances in this manner, a DULF fulfillment centre would search for and obtain substances in the illicit market through the darknet markets from vendors in Canada and community sources.

Purchasing online has the benefit of reducing interactions and potential violence from buying in-person, and due to the nature of these darknet markets, vendors remain anonymous.



## Quality Control

Before labeling and packing the substances, DULF implements a quality control process utilizing Fourier-transform infrared spectroscopy (FTIR) and Paper Spray Mass Spectrometry (PS-MS) drug checking services, as well as fentanyl and benzodiazepine immunoassay test strips.

By testing the substances at a point higher up the chain of distribution, this model exponentially increases the effect of drug checking as a harm reduction service.

This Exponentially increases the effectiveness and impact of drug checking initiatives.



# Limitations of FTIR Testing

Currently, FTIR drug checking can provide information on mixture components above ~5% by weight, and roughly quantify components to within +/- 5% and are unable to differentiate similar molecules (E.g. 6-MAM and heroin).

If DULF's compassion club model were sanctioned, we could also explore means of accessing more reliable and sensitive testing equipment to improve the quality control mechanism.



# Storing the Substances

Once DULF receives the substances, the organization immediately puts the substances into a secure safe onsite and logs the supply in an inventory record. This record is subjected to a daily count to ensure there is no theft, loss or diversion. Further, records are kept on any dispensation including to compassion clubs or to club members.



## **Labels and Packaging**

A key component to the harm reduction facilitated by compassion clubs is that people are provided with the information they need to make an informed choice to use the substance.

Unlike when consumers purchase their drugs off the street, substances from the DULF compassion club would be labeled with the contents and percentage composition of the substance, as determined by FTIR.

In a similar fashion to tobacco labeling, the packaging is also plain with warnings of the highly addictive nature of the substances and impairing effects, and with warnings to not operate any vehicles or machinery. Examples of DULF labeling are provided on the next page.

Provided with resourcing or the ability to operate at-cost, the cooperative could employ tamper-resistant and anti-counterfeit packaging to increase the safety and reliability of the service.

# DULF Packaging Examples

<p><b>WARNING</b> This product contains cocaine which is a highly addictive substance.</p>	 <p><b>Cocaine</b> cocaine ~100% no cut / no buff</p>	<p><b>CAUTION</b> THIS PRODUCT CAN MIX WITH ALCOHOL AND IMPAIR YOUR ABILITY TO DRIVE</p> 	<p>Cocaine can cause DEPENDENCE, ADDICTION and OVERDOSE.</p> 	<p><b>Ingredients:</b> cocaine.*</p> <p>*Please see insert.</p> <p><b>NOT FOR SALE.</b></p> <p>Keep away from children and pets.</p>
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<p><b>WARNING</b> This product contains amphetamine which is a highly addictive substance.</p>	 <p><b>Meth</b> methamphetamine ~100% no cut / no buff</p>	<p><b>CAUTION</b> THIS PRODUCT CAN MIX WITH ALCOHOL AND IMPAIR YOUR ABILITY TO DRIVE</p> 	<p>Meth can cause DEPENDENCE, ADDICTION and OVERDOSE.</p> 	<p><b>Ingredients:</b> methamphetamine.*</p> <p>*Please see insert.</p> <p><b>NOT FOR SALE.</b></p> <p>Keep away from children and pets.</p>
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<p><b>WARNING</b> This product contains heroin which is a highly addictive substance.</p>	 <p><b>Heroin</b> diacetylmorphine ~40% caffeine ~60%</p>	<p><b>MAY CAUSE DROWSINESS OR DIZZINESS. THIS EFFECT MAY BE EXAGGERATED. USE CARE WHEN OPERATING A CAR OR DANGEROUS MACHINERY. ONLY</b></p> 	<p>Opioids can cause DEPENDENCE, ADDICTION and OVERDOSE.</p> 	<p><b>Ingredients:</b> heroin; caffeine.*</p> <p>*Please see insert.</p> <p><b>NOT FOR SALE.</b></p> <p>Keep away from children and pets.</p>
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# Membership Assessment

Compassion Club Membership assessment is to be conducted in-person by club peer.

If they are accepted, they fill out a membership form.

Membership in an existing and established drug user group is also accepted in lieu of membership.

**HANDLE:**

Do you use illicit drugs?

Yes:  No:

Are you over 18?

Yes:  No:

## **Distribution**

For the compassion club to remain cost efficient, substances must be provided at-cost to club membership.

Substances at larger actions are obtained through private donations, so they are provided free-of-cost.

Due to dependence on illicit markets, future prices will reflect street prices if there is no other viable option. Bulk-purchase allows compassion clubs to leverage economies of scale.

## **Outcomes**

DULF currently collects basic data on all drugs that have been distributed; DULF has distributed over 1200 doses with no know overdoses.

With further funding, DULF will engage in a deeper evaluative study of the impacts of a real safe supply.

## **What You Can Do to Help**

Donate to our Sustainer Donor Program at  
<https://www.dulf.ca/sdc>

Get a letter of support from your organization or institution.

Sign our petition at:  
<https://www.change.org/p/health-canada-approve-dulf-compassion-club-and-sect-56-applications>

Write or reach out to your MP or MPP and express support for DULF's activities.

Volunteer at one of our actions.