



[ssdpunimelb@gmail.com](mailto:ssdpunimelb@gmail.com)

Parliamentary Joint Committee on Law Enforcement  
PO Box 6100  
Parliament House  
Canberra ACT 2600  
[le.committee@aph.gov.au](mailto:le.committee@aph.gov.au)  
17/12/2021

## Inquiry into the impact of illicit drugs being traded online

Dear Secretary,

Students for Sensible Drug Policy at the University of Melbourne (SSDP UniMelb) thanks the Federal Government for the invitation to submit to this inquiry and supports its decision to investigate online illicit drug trading. We (SSDP UniMelb) would like to comment on the below terms of reference:

- B. the impact of technologies, including online communications, cryptocurrency, and encryption and anonymising technologies on law enforcement responses to the online illicit drug trade
- C. supply chains and sourcing online, including the role of individual suppliers and criminal organisations;
- D. impacts on at-risk groups, young people and their families, and the community due to the availability of illicit drugs online;
- E. the dangers of purchasing drugs online, including the chemical content of 'recreational' drugs;
- F. the impact of legislation and policies that seek to decriminalise drug use and possession on the online availability, quality control and the capacity of law enforcement agencies to police illicit drugs;



## Table of contents

<b>Inquiry into the impact of illicit drugs being traded online</b>	<b>0</b>
<b>Table of contents</b>	<b>1</b>
<b>Background</b>	<b>2</b>
SSDP Australia	2
SSDP UniMelb	3
Online Illicit Drug Trading	3
<b>1.0 We recommend the decriminalisation of all drugs in respect to possession charges and for those caught with a personal quantity of illicit drugs to receive referrals into Alcohol and Other Drug (AOD) counselling, along with their third party individuals.</b>	<b>6</b>
<b>2.0 We recommend take-home naloxone distribution, training and education programs be made available in all states and territories that do not currently have an existing service.</b>	<b>9</b>
<b>3.0 We recommend that peer-based harm reduction training and education be made available to young people and students about safer party drug use, including the use of drug checking services.</b>	<b>10</b>
<b>4.0 We recommend that safe injecting centres be made available in all states and territories that do not have an existing facility.</b>	<b>12</b>
<b>5.0 We recommend fentanyl testing strips be made available to people who use drugs via peer-based organisations such as state-funded user organisations.</b>	<b>13</b>
<b>6.0 We recommend that drug checking (aka pill testing) services, both mobile delivery and fixed-site methods be made available at music festivals and at clinical sites in major cities</b>	<b>14</b>
<b>Conclusion</b>	<b>14</b>



## Background

### SSDP Australia

Students for Sensible Drug Policy Australia (SSDP Australia) is a national youth-led organisation that empowers and represents young people to bring change to drug policy<sup>1</sup>. Young people are the most likely age group to use illicit drugs<sup>2</sup> and the most likely to want drug policy reform<sup>3</sup>, yet they are the least likely to be involved in decision-making about drug-related policies and programs.

SSDP Australia neither condemns nor condones drug use. We are informed by the evidence of what works and doesn't work and recognise that while abstinence may be the best form of harm reduction, many continue to use drugs without wanting to immediately abstain. Students who use drugs face challenges overcoming stigma and discrimination in accessing health, education and platforms for advocacy. By empowering the collective capacity of students to keep themselves safe and advocate for change, we hope to improve the lives of young people and shift political, policy and community perspectives.

Our organisation is a collection of students involved in clubs formed at university campuses around Australia; the University of Melbourne and La Trobe University in Victoria; University of Western Australia and Curtin University in WA; and Macquarie University and the University of New South Wales in NSW. This submission provides the Committee with a unique perspective from young people with a passionate interest in drug policy.

---

<sup>1</sup> Students for Sensible Drug Policy Australia (2021) (online 2/12/2021: <https://www.ssdp.org.au/>)

<sup>2</sup> Australian Institute of Health and Welfare (AIHW) (2020) National Drug Strategy Household Survey DSHS 2019 Main Report (Report edition: 16 Jul 2020), p.35  
<https://www.aihw.gov.au/reports/illicit-use-of-drugs/national-drug-strategy-household-survey-2019/contents/table-of-contents>

<sup>3</sup> Kari Lancaster, Alison Ritter, Francis Matthew-Simmons (2013) Young people's opinions on alcohol and other drugs issues. National Drug and Alcohol Research Centre, University of New South Wales p.141:  
<https://ndarc.med.unsw.edu.au/sites/default/files/newsevents/events/RP27-young-peoples-opinions.pdf>



## SSDP UniMelb

SSDP at the University of Melbourne (SSDP UniMelb) was established in 2016 and is an affiliated student club with the University of Melbourne's Student Union (UMSU). We are made up of a grassroots network of students and allies working towards meaningful reforms grounded in evidence, compassion and human rights. We have been connecting with like-minded peers and academics to bring about harm reduction programs for young people for over 5 years.<sup>4 5 6</sup>

One factor that has been a common feature amongst SSDP UniMelb members is the value they gain from having a safe environment for an open conversation about a topic often seen as taboo. Issues of alcohol and other drugs are also highlighted as a pivotal issue for youth, with three in ten respondents in the Mission Australia annual youth survey highlighting this as a key priority.<sup>7</sup> We welcome the opportunity to put forward a submission and hope that including the opinions of students and particularly young people who encounter licit and illicit drug use will help shape policy that is effective and relevant.

---

<sup>4</sup> Cooke, H. & Priess, B (2016) 'Student union to hand out drug-testing kits at the University of Melbourne campus' *The Age*, (online 21/10/2021: <https://www.theage.com.au/national/victoria/student-union-to-hand-out-drug-testing-kits-at-university-of-melbourne-campus-20160920-grkh27.html>)

<sup>5</sup> Shearer, C. (2016) 'Melbourne Uni's student union will soon hand out free drug testing kits' *Vice* (online 21/10/2021: <https://www.vice.com/en/article/qb5zqv/melbourne-unis-student-union-is-going-to-hand-out-free-drug-testing-kits>)

<sup>6</sup> Barro, C. (2016) 'More student unions want drug testing kits at universities' *Mojo News* (online 21/10/2021: <https://www.mojonews.com.au/page/more-student-unions-want-drug-testing-kits-at-universities?amp=1>)

<sup>7</sup> Fildes, J., Liyanarachchi, D., Perdriau, A., Plummer, J. and Wearing, A. (2019) Close to home: young people and the impact of alcohol and drug use by family and peers. A 2018 Youth Survey report. *Mission Australia: Sydney, NSW*. (online 4/12/2021: <https://www.missionaustralia.com.au/publications/youth-survey/1300-close-to-home-young-people-and-the-impact-of-alcohol-and-drug-use-by-family-and-peers/file>)



## Online Illicit Drug Trading

In recent years, the online illicit drug market gained popularity due to increased accessibility and perceived anonymity often on the darknet and on social media.<sup>8</sup> The online illicit market is also attractive for various other reasons: Price data is available and buyers believe they are purchasing drugs at a cheaper price;<sup>9</sup> There is an increased availability of a larger variety of drugs; the convenience of not having to buy drugs in-person; there is also a perception of increased and consistent purity of drugs purchased online and the perceived certainty of receiving the substances, given assurances provided by sellers.<sup>10</sup>

Another perceived advantage of social media and encrypted messaging apps is that they provide an opportunity to assess drug quality and safety, in that drug distributors upload images and videos of substances in a bid to reassure their buyers.<sup>11</sup> Many people also think they will avoid law enforcement by buying drugs online.<sup>12</sup> The online drug market has the potential to lull its customers into a false sense of security, it also possesses the danger of misleading people to think drugs bought online are safer, thereby resulting in carelessness such as not practicing drug checking (aka pill testing) and other safer drug use exercises.<sup>13</sup>

Internet communication and commerce is a key factor in the increased availability of fentanyl and other synthetic opioids, resulting in a sharp increase in overdose deaths since 2013, particularly in

---

<sup>8</sup> Gouwe, D., Brunt, T., Laar, M. & Pol, P (2017) 'Purity, adulteration and price of drugs bought online versus offline in the Netherlands' *Addiction*, p. 640-648 (online 4/12/2021: <https://pubmed.ncbi.nlm.nih.gov/27936283/>)

<sup>9</sup> Gouwe Brunt Laar & Pol, Above n 8.

<sup>10</sup> Rhumorbarbe, D., Staehli, L., Broséus, J., Rossy, Q., & Esseiva, P. (2016). Buying drugs on a Darknet market: A better deal? Studying the online illicit drug market through the analysis of digital, physical and chemical data. *Forensic science international*, 267, 173-182. (online 3/12/2021: <https://pubmed.ncbi.nlm.nih.gov/27611957/>)

<sup>11</sup> Moyle, L., Childs, A., Coomber, R., & Barratt, M. J. (2019). #Drugsforsale: An exploration of the use of social media and encrypted messaging apps to supply and access drugs. *International Journal of Drug Policy*, 63, 101-110 (online 3/12/2021: <https://pubmed.ncbi.nlm.nih.gov/30530252/>)

<sup>12</sup> Moyle Childs Coomber & Barratt, Above n 11.

<sup>13</sup> Williams, C., (2021) 'Alexander died from a pill he brought on Snapchat. Now his mother is taking on big tech' *ABC News* (online 2.21.2021: <https://www.abc.net.au/news/2021-10-05/social-snapchat-drug-dealing-on-the-rise-say-experts/100514734>)



the USA and Canada.<sup>14 15</sup> The problem is spreading through much of Europe, and has been discovered in NSW in the heroin supply, as well as in ketamine, illegally sold prescription medication and drugs misrepresented as cocaine and methamphetamine.<sup>16 17</sup> Fentanyl and other synthetic opioids are more profitable for suppliers and easier to smuggle, as the product is much more condensed.<sup>18</sup> This creates specific challenges for law enforcement with its availability on encrypted, darknet marketplaces.

While illegally manufactured fentanyl is currently not widespread in Australia, there are several factors which make the Australian illicit drug market particularly vulnerable.<sup>19</sup> The arrival of illegally manufactured fentanyl in illicit markets is often precipitated by a supply disruption in heroin or prescription pills.<sup>20</sup> The decrease of opium production in Myanmar, a key source of illegal opiates in Australia, is of additional worry.<sup>21</sup> Recent efforts locally to reduce opioid prescriptions may also disrupt diversion and supply to illicit drug markets. Further, COVID-19 destabilised the import and exportation patterns of many illicit drugs. Such supply shocks would result in drug

---

<sup>14</sup> Ciccarone, D. (2021) 'The rise of illicit fentanyl, stimulants and the fourth wave of the opioid overdose crisis', *Current Opinion in Psychiatry*: July - Volume 34 - Issue 4 - p 344-350 (online 12/4/2021: [https://journals.lww.com/co-psychiatry/fulltext/2021/07000/the\\_rise\\_of\\_illicit\\_fentanyls\\_stimulants\\_and\\_the\\_4.aspx](https://journals.lww.com/co-psychiatry/fulltext/2021/07000/the_rise_of_illicit_fentanyls_stimulants_and_the_4.aspx))

<sup>15</sup> Lokala, U., Lamy, F. R., Daniulaityte, R., Sheth, A., Nahhas, R. W., Roden, J. I., Yadav, S., & Carlson, R. G. (2019). Global trends, local harms: availability of fentanyl-type drugs on the dark web and accidental overdoses in Ohio. *Computational and mathematical organization theory*, 25(1), 48–59 (online 3/12/2021: [https://scholarcommons.sc.edu/aii\\_fac\\_pub/350/](https://scholarcommons.sc.edu/aii_fac_pub/350/))

<sup>16</sup> Ciccarone, Above n 12.

<sup>17</sup> Lokala, Lamy, Daniulaityte, Sheth,, Nahhas, Roden, Yadav, & Carlson, Above n 13.

<sup>18</sup> Ciccarone, Above n 12.

<sup>19</sup> Allan, J. (2020) 'The deadly opioid fentanyl is turning up in disguise on Sydney streets, making illicit drug use even riskier' *The Conversation* (online 2/12/2021: <https://theconversation.com/the-deadly-opioid-fentanyl-is-turning-up-in-disguise-on-sydney-streets-making-illicit-drug-use-even-riskier-132598>)

<sup>20</sup> Pardo, B., Hulme, S., & Taylor, J (2021) 'Australia contained COVID-19 early on. Can it do the same with synthetic opioids?' *The RAND Blog* (online 30/4/2021: <https://www.rand.org/blog/2021/04/australia-contained-covid-19-early-on-can-it-do-the.html>)

<sup>21</sup> United Nations Office on Drug and Crime (2020) 'Myanmar opium cultivation drops again as the regional drug economy continues to evolve' *United Nations* (online 7/12/2021: <https://www.unodc.org/unodc/en/frontpage/2020/February/myanmar-opium-cultivation-drops-again-as-the-regional-drug-economy-continues-to-evolve.html>)



distributors shifting to fentanyl, readily available on the darknet.<sup>22 23</sup> Experts have been predicting an increase in the amount of fentanyl in the Australian underground market for some time, with research suggesting that Australia usually follows the patterns of drug harms occurring in countries such as Canada and the USA.<sup>24</sup>

## 1.0 We recommend the decriminalisation of all drugs in respect to possession charges and for those caught with a personal quantity of illicit drugs to receive referrals into Alcohol and Other Drug (AOD) counselling, along with their third party individuals.

SSDP UniMelb recommends that any legislative or regulatory response to the online drug trade avoids punishing people who use drugs and people acquiring drugs online. This is consistent with our view that the criminalisation of drugs, online or otherwise, is detrimental to many people and their families. A health-based approach focussing on decriminalisation shows promising outcomes for society as a whole.<sup>25 26 27</sup>

---

<sup>22</sup> Allan, Above n 14.

<sup>23</sup> Pardo, Hulme, & Taylor, Above n 15.

<sup>24</sup> Hanson BL, Porter RR, Zöld AL, Terhorst-Miller H. (2020) 'Preventing opioid overdose with peer-administered naloxone: findings from a rural state'. *Harm Reduction Journal*. 17(1):1-9 (online 2/12/2021: <https://harmreductionjournal.biomedcentral.com/articles/10.1186/s12954-019-0352-0>)

<sup>25</sup> Turner, L. (2018) "Could the controversial 'portugal method' end the war on drugs?" *A Current Affair* (Online 2/12/2021: <https://fionapatten.com.au/news/controversial-portugal-method-end-war-drugs/>)

<sup>26</sup> Hughes, K. (2010) 'What can we learn from the Portuguese decriminalisation of illicit drugs?' *British Journal of Criminology* (online, 2/21/2021: file:///C:/Users/User/Downloads/What\_Can\_We\_Learn\_From\_The\_Portuguese\_Decriminaliz.pdf)

<sup>27</sup> Greenwald, G. (2009) 'Drug decriminalisation in Portugal: Lessons for creating fair and equitable drug policies' *Cato Institute* (online 2/21/2021: <https://www.cato.org/white-paper/drug-decriminalization-portugal-lessons-creating-fair-successful-drug-policies>)





The current criminalisation of people who use drugs takes law enforcement agency (LEA) resources away from tackling organised crime groups. Using LEA resources to punish individual users is an ineffective demand reduction strategy, and does little to limit problematic drug use. The Parliamentary Joint Committee of the Australian Crime Commission's 2007 *Inquiry into the manufacture, importation and use of amphetamines and other synthetic drugs (AOSD) in Australia* found that "Prohibition, while theoretically a logical and properly-intentioned strategy, is not effective, as it has the effect of driving [illicit drug] use underground".<sup>28</sup> We believe that increased criminalisation of drug possession and the purchasing of drugs online would further discriminate against and stigmatise individual users.<sup>29</sup> This undermines more effective demand and harm reduction strategies as "people who use illicit substances are reluctant to seek medical help for fear of the possible consequences of criminal conviction".<sup>30</sup>

The 2007 Inquiry stressed that the three pillars of the National Drug Strategy—supply reduction, demand reduction and harm reduction—will achieve greater outcomes if a better balance between these approaches can be reached, and that "resources should be directed to those areas that offer the greatest returns".<sup>31</sup> This has become increasingly pertinent with the rise of darknet markets.

Darknet markets have created unique problems for Law Enforcement Agencies (LEAs), proving to be less susceptible than traditional illicit markets to LEA countermeasures such as undercover operations. The Australian Institute of Criminology's 2021 research report on the *Impact of darknet market seizures on opioid availability* found that while market seizures are disruptive to the supply of illicit drugs, they have little long term impact as vendors and customers simply migrate to a

---

<sup>28</sup> Parliament of Australia (2007) *Inquiry into the manufacture, importation and use of amphetamines and other synthetic drugs (AOSD) in Australia*, Parliamentary Joint Committee of the Australian Crime Commission (online 14/12/2021:

[https://www.aph.gov.au/Parliamentary\\_Business/Committees/Joint/Former\\_Committees/acc/completed\\_inquiries/2004-07/aosd/tor](https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Former_Committees/acc/completed_inquiries/2004-07/aosd/tor))

<sup>29</sup> Lee, N & Bartle, J. (2021) "The police new scare campaign won't stop people from using drugs. But it will increase stigma" *The Conversation* (online 29/11/2021: <https://theconversation.com/the-polices-new-scare-campaign-wont-stop-people-from-using-drugs-but-it-will-increase-stigma-171303?fbclid=IwAR1iusqdvJ4P-v0uXkFx53p6DvNu2KOq9tummyBlxnL07TKoKMHsmzyQNjZk>)

<sup>30</sup> Parliament of Australia, Above n 23.

<sup>31</sup> Parliament of Australia, Above n 23.





surviving market (or a new one).<sup>32</sup> The increased complexity of darknet drug markets and endless challenges they pose for LEA responses highlights the need for a strategic rethink of how we should best direct resources to achieve the greatest harm minimisation outcomes.

LEAs have had greater impact on supply-reduction of fentanyl and other synthetic opioids through operations targeting specific products and the online markets most active in their sale.<sup>33</sup> While ultimately the chemical content of 'recreational drugs' would be better managed by a regulated market, the most pragmatic use of LEA resources under the current National Drug Strategy would be to shift resources away from targeting users and low level dealers to targeting specific high risk products and criminal syndicates manufacturing and distributing them online. This would allow for more cost-effective LEA supply-reduction operations resulting in greater harm minimisation outcomes, and more funding for evidence based demand-reduction and harm-reduction programs in the health sector.

A public health approach of decriminalisation aims to rehabilitate the causes underlying people's substance use not unintentionally make it harder for those affected to access support. SSDP UniMelb recommends the removal of all criminal sanctions for those caught with a personal quantity of illicit drugs by way of lessening harms of the web-based illicit drug trading for young people who are more likely to come in contact with online drug advertisements.<sup>34 35</sup> We support a policy response that refers people who use drugs to AOD counselling services at their local community health agency over a criminal charge.

We'd also recommend, if a person is found to possess a personal amount of currently illicit drugs, that services reach out to their family and friends to provide education and counselling opportunities about the person engaged in substance use. We know through a handful of Australian

---

<sup>32</sup> Australian Government (2021) *Impact of darknet market seizures on opioid availability*. Australian Institute of Criminology (online 14/12/2021: [https://www.aic.gov.au/sites/default/files/2021-02/rr18\\_impact\\_of\\_darknet\\_market\\_seizures\\_on\\_opioid\\_availability.pdf](https://www.aic.gov.au/sites/default/files/2021-02/rr18_impact_of_darknet_market_seizures_on_opioid_availability.pdf))

<sup>33</sup> Australian Government, Above n 28.

<sup>34</sup> Auxier, B., Anderson, M. (2021) 'Social Media use in 2021' *PEW Research Centre* (online 12/2/2021: <https://www.pewresearch.org/internet/2021/04/07/social-media-use-in-2021/>)

<sup>35</sup> McColloch, L., & Furlong, S. (2019) 'Selling drugs in the age of social media' *Volteface* (online 2/12/2021: <https://volteface.me/app/uploads/2020/08/Volteface--Social-Media-report-DM-for-Details.pdf>)



research projects that if the family is engaged and connected to the person dependent, there are better outcomes for all - the user and the family more broadly.<sup>36 37 38</sup>

## 2.0 We recommend take-home naloxone distribution, training and education programs be made available in all states and territories that do not currently have an existing service.

Naloxone is a drug that can temporarily reverse the effects of an opioid overdose. Fentanyl and synthetic opioids pose a threat to Australia via online trading routes as discussed in the '*Online Illicit Drug Trading*' section of this submission. Fast response to an opioid overdose, including the administration of naloxone can prevent brain injury and death.<sup>39</sup> A review of take-home naloxone programmes state that they are found to reduce overdose mortality among programme participants and in the community.<sup>40</sup> Naloxone cannot be self-administered, thus it is important that third parties such as family members of people who use opioids have access to naloxone training programs. Furthermore, naloxone has no effect on someone who does not have opioids in their system.<sup>41</sup>

---

<sup>36</sup> Gethin, A., Trimingham, T., Chang, T., Farrell, M., & Ross, J. (2016) Coping with problematic drug use in the family: an evaluation of the stepping stones program. *Drug and Alcohol Review* (online: <https://pubmed.ncbi.nlm.nih.gov/26365113/>)

<sup>37</sup> Daglish, A (2021) 'Stepping stones study - the family perspective' Vimeo (online 2/21/2021: <https://vimeo.com/626541357/0c23def3c6?fbclid=IwAR1pcjTjkUQw64G7LE-OK0eI5XSCIL7JG8pm3Xmz4rB5gAAU6whE9tAbwZc>)

<sup>38</sup> Family Drug Support Australia (2020) 'Family Drug Support Australia: Support Line 1300 368 186, Family Drug Support Australia' (online 2/21/2021: <https://www.fds.org.au/>)

<sup>39</sup> U.S. Department of Health and Human Services (2021) 'How to respond to an Opioid Overdose' U.S. Department of Health of Human Services (online 4/21/2021: <https://www.hhs.gov/opioids/treatment/overdose-response/index.html>)

<sup>40</sup> McDonald, R. & Strang, J. (2016) 'Are take-home naloxone programmes effective? Systematic review utilizing application of the Bradford Hill Criteria' *Addiction* (online 4/12/2021: <https://pubmed.ncbi.nlm.nih.gov/27028542/>)

<sup>41</sup> National Institute on Drug Abuse (2021 'Naloxone Drugfacts' *National Institute on Drug Abuse* (online 4/12/2021: <https://www.drugabuse.gov/publications/drugfacts/naloxone>).



Take home naloxone pilot programmes have made naloxone available free of charge and without a prescription within a number of various states and territories of Australia.<sup>42</sup> Therefore, we believe that it would be beneficial to expand this programme to the remaining states and jurisdictions, where take-home naloxone is less available. We further suggest that training programmes for the use of naloxone should be conducted for people who use opioids and third parties such as their friends and family members.

In a report regarding a similar programme published in the American Journal of Public Health, the Overdose Education and Naloxone Distribution Program of the Baltimore Student Harm Reduction Coalition, third-party prescriptions of naloxone were given to individuals who may be able to respond to an overdose.<sup>43</sup> In addition, the programme was run by a coalition of student volunteers, which lowered the cost of the programme. The training was effective at increasing self-efficacy regarding overdose prevention and response, and seemed to persist for 8 to 12 months following the survey. The Federal Government should consider a similar peer-based delivery model of naloxone distribution to keep expenses low and accessible to the right cohorts who need it the most.

---

<sup>42</sup>Australian Government (2021) 'About the take home naloxone pilot' *Department of Health* (online 4/21/2021: <https://www.health.gov.au/initiatives-and-programs/take-home-naloxone-pilot/about-the-take-home-naloxone-pilot>)

<sup>43</sup> Lewis, D. A., Park, J. N., Vail, L., Sine, M., Welsh, C., & Sherman, S. G. (2016). Evaluation of the overdose education and naloxone distribution program of the Baltimore Student Harm Reduction Coalition. *American journal of public health*, 106(7), 1243-1246 (online 2/12/2021: <https://pubmed.ncbi.nlm.nih.gov/27077351/>)



### 3.0 We recommend that peer-based harm reduction training and education be made available to young people and students to facilitate safer party drug use, including the use of drug checking services.

One such at-risk group likely to have contact with illicit drugs online is young people.<sup>44 45</sup> According to the National Drug and Alcohol Research Centre, regarding drug-related hospitalisations in Australia from 2018-2019, the highest rate of drug-related hospitalisations was observed among the 20-29 age group.<sup>46</sup> This is the age group that has an increased use of social media.<sup>47</sup> A report by Volteface, indicates that there is a positive correlation between frequency of social media use and the likelihood of seeing drugs advertised for sale.<sup>48</sup> Educating on the possible risks of purchasing unknown substances from strangers on social media is important, by ensuring that they are aware of the dangers of purchasing drugs online, thereby encouraging young people to practice caution.

Evidence has shown that harm reduction strategies such as drug checking (aka pill testing) are valuable as the claims of drug distributors online are unreliable. In a study examining drugs sold as ecstasy from 1999-2005 there was a decrease in the purity of pills over time.<sup>49</sup> The data showed that 39% of the tablets consisted of MDMA only, 46% only contained substances other than MDMA

---

<sup>44</sup> AIHW (2021) 'Alcohol, tobacco and other drug in Australia,' Behaviour and Risk Factors (online 6/09/2021 <https://www.aihw.gov.au/reports/alcohol/alcohol-tobacco-other-drugs-australia/contents/impacts/health-impacts>)

<sup>45</sup> Department of Health (2017) 'National Drug Strategy 2017 - 2026' Australian Government (online 6/09/2021 <https://www.health.gov.au/resources/publications/national-drug-strategy-2017-2026>)

<sup>46</sup> Man, N., Chrzanowska, A., Sutherland, R., Degenhardt, L., & Peacock, A. (2021) 'Trends in drug-related hospitalisations in Australia, 1999-2019, National Drug and Alcohol Research Centre (online 4.21.2021: <https://ndarc.med.unsw.edu.au/resource-analytics/trends-drug-related-hospitalisations-australia-1999-2019>)

<sup>47</sup> Auxier & Anderson, Above n 44.

<sup>48</sup> McColloch & Furlong, Above n 45.

<sup>49</sup> Tanner-Smith, E. E. (2006). Pharmacological content of tablets sold as "ecstasy": Results from an online testing service. *Drug and Alcohol Dependence*, 83(3), 247-254 (online 2/12/2021: <https://psycnet.apa.org/record/2006-08712-009>)



and 15% were mixtures of MDMA and other substances. Similarly, drugs sold online have been found to have no statistical difference in quality to those sold in person, regardless of what online distributors say, and drugs sold over the internet were in fact slightly more expensive.<sup>50</sup> Hence, harm reduction programs should emphasize on the potential impurity of illicit drugs purchased online and highlight the importance of practicing safer drug use, including the utilisation of laboratory-based, drug checking services that screen for all chemical compounds.<sup>51 52 53</sup>

## 4.0 We recommend that safe injecting centres be made available in all states and territories that do not have an existing facility.

Supervised injecting centres (SICs) are dedicated spaces where illicit drugs can be injected in a supervised health setting. These spaces also provide access to other health services like mental health support, drug treatment, wound care and blood testing.<sup>54</sup>

In order to reduce drug related harms and associated health costs, particularly resulting from increased availability of fentanyl and other synthetic opioids on online markets, we recommend that all states and territories implement a SIC trial based on the Sydney MSIC.

Uniting Medically Supervised Injecting Centre (MSIC) Kings Cross has been operating for over 20 years managing 8500 overdoses without a single overdose death. While initially attracting

<sup>50</sup> Gouwe, Brunt, Laar & Pol, Above n 8.

<sup>51</sup> Barratt, M. et al (2018) Global review of drug checking services operating in 2017, *Drug Policy Modeling Program, National Drug and Alcohol Research Centre, Bulletin 24, 1-12* (online 3/12/2021: <https://ndarc.med.unsw.edu.au/sites/default/files/ndarc/resources/Global%20review%20of%20drug%20checking%20services%20operating%20in%202017.pdf>)

<sup>52</sup> Brunt, T. (2017) Drug checking as a harm reduction tool for recreational drug users: opportunities and challenges, European Monitoring Centre for Drugs and Drug Addiction, (online 6/09/2021 [http://www.emcdda.europa.eu/system/files/attachments/6339/EuropeanResponsesGuide2017BackgroundPaper-Drug-checking-harm-reduction\\_0.pdf](http://www.emcdda.europa.eu/system/files/attachments/6339/EuropeanResponsesGuide2017BackgroundPaper-Drug-checking-harm-reduction_0.pdf))

<sup>53</sup> Giné, C. et al (2017) The utility of drug checking services as monitoring tools and more: A response to Pirona et al., *International Journal of Drug Policy*, 45, 46- 47

<sup>54</sup> North Richmond Community Health (2021) 'Medically Supervised Injecting Room' *North Richmond Community Health* (online 9/12/2021: <https://nrch.com.au/services/medically-supervised-injecting-room/>)



controversy and strong opposition from local residents, the facility has been an overwhelming success and public support for it continues to grow. Independent evaluations and analyses commissioned by the NSW government found that:

*“...the MSIC positively impacts on clients, has a high level of support from local residents and businesses, has not been shown to cause an increase in local crime or drug use and saves at least \$658,000 per annum over providing similar health outcomes through other means in the health system.”<sup>55</sup>*

Victoria’s first SIC trial opened at North Richmond Community Health in July 2019, delivering similar benefits to people who inject drugs and the wider community. Following an independent review into the program, the government accepted a key recommendation to establish a second site in the City of Melbourne. Extensive consultation has already occurred with key stakeholders on Melbourne’s second SIC.

Critics of SICs argue that these facilities sanction or encourage drug use, and that they attract crime and anti-social behaviour. For the Sydney MISC, evaluations have shown that there is no increase in drug use for the Kings Cross area, in fact it reduced ambulance call outs and minimised the public nuisance of the street-based drug market over time.<sup>56 57</sup> The evidence is very clear, from over 120 SICs internationally, that these facilities provide significant benefits to the individuals who use them, by reducing health problems, improving access to education and support, reducing impact and trauma on the broader community and importantly, reducing health costs associated with drug use.<sup>58</sup> Again, if there were more accessible, harm reduction service options throughout Australia such as SIC’s, the online illicit drug trade would cause less damage to individual people and their communities and families than is currently the case.

---

<sup>55</sup> KPMG (2021) ‘Further evaluation of the Medically Supervised Injecting Centre during its extended Trial period (2007-2011): Final report, 14 September 2010, p. ix (online 4/12/2021: <https://www.health.nsw.gov.au/aod/resources/Documents/msic-kpmg.pdf>)

<sup>56</sup> National Centre of HIV Epidemiology and Clinical Research (2007) *Sydney Medically Supervised Injecting Centre Evaluation Report 4: Evaluation of service provision and overdose related deaths* (online 12/12/2021: <https://kirby.unsw.edu.au/sites/default/files/kirby/report/EvalRep4SMSIC.pdf>)

<sup>57</sup> MSIC Evaluation Committee (2003) *Final report on the evaluation of the Medically Supervised Injecting Centre* (online 12/12/2021: [https://www.drugsandalcohol.ie/5706/1/MSIC\\_final\\_evaluation\\_report.pdf](https://www.drugsandalcohol.ie/5706/1/MSIC_final_evaluation_report.pdf))

<sup>58</sup> Premier of Victoria (2020) ‘Saving And Rebuilding Lives From Drug Addiction’ *Premier of Victoria* (online 9/12/2021: <https://www.premier.vic.gov.au/saving-and-rebuilding-lives-drug-addiction>)



## 5.0 We recommend fentanyl testing strips be made available to people who use drugs via peer-based organisations such as state-funded user organisations.

Rapid fentanyl testing strips are used to detect the presence of fentanyl in a drug, not quantity or strength. In the USA and Canada, Fentanyl is the cause of rapidly escalating opioid overdoses and is commonly sold online as the section, '*illicit drug trading*' establishes in this submission. Programs that provide rapid tests have been demonstrated to be highly accurate and easy to use in trials in the US.<sup>59 60</sup> The majority of participants that took part in this trial reported positive changes in drug use behaviour in that they decided not to consume drugs that tested positive for the presence of fentanyl. The introduction of testing strips may assist in reducing the unintended harms already witnessed in Australia from the online drug trade.<sup>61</sup>

---

<sup>59</sup> NSW Government (2020) 'Warnings over fentanyl risk in Sydney NSW' *NSW Department of Health* (online 3/12/2021: [https://www.health.nsw.gov.au/news/Pages/20200222\\_00.aspx](https://www.health.nsw.gov.au/news/Pages/20200222_00.aspx))

<sup>60</sup> Hanson, B. L., Porter. R. R., Zöld, A.L., & Terhorst-Miller, H. (2007) 'Preventing opioid overdose with peer-administered naloxone: findings from a rural state'. *Harm Reduction Journal*. 17(1):1-9 (online 5/12/2021: <https://harmreductionjournal.biomedcentral.com/articles/10.1186/s12954-019-0352-0>)

<sup>61</sup> Williams, Above n 11.





## 6.0 We recommend that drug checking (aka pill testing) services, both mobile delivery and fixed-site methods be made available at music festivals and at clinical sites in major cities

Providing laboratory-based drug checking services at music festivals and harm reduction sites can provide opportunistic health interventions with hard to reach drug using populations.<sup>62</sup> By serving a vulnerable group in the community, harm reduction services offer a rare chance to engage with people taking risks with their health and deliver a combination of practical advice keeping people as safe as possible. In the USA, drug checking programs have been conducted at syringe service programs.<sup>63</sup> In Canada, drug checking programs have been tested at safe injection facilities along with other harm reduction services and have shown encouraging results in the form of improved health status for the target population.<sup>64</sup>

Drug checking services conducted at these point-of-care service sites provide important information about behavioral responses to test results, such as drug dose reduction, drug disposal, and other harm reduction practices, as well as overall drug test use and type of contaminated substances. By implementing fixed-site drug checking services and those at music festivals, will the harms associated with the perception of drugs being safer online, be reduced at the point of ingestion for many young people.

---

<sup>62</sup> Caldicott, D. (2015) 'What is drug checking and why do we need it in Australia' *The Conversation* (online 2/21/2021:

<https://theconversation.com/what-is-drug-checking-and-why-do-we-need-it-in-australia-51578>)

<sup>63</sup> Park, J.N, Frankel, S., Morris, M., et al. (2021) 'Evaluation of fentanyl test strip distribution in two mid-atlantic syringe service programs' *International Journal of Drug Policy* (online 2/21/2021: <https://pubmed.ncbi.nlm.nih.gov/33713964/> \_

<sup>64</sup> U.S Department of Health and Human Services (2021) 'Drug checking programs in the United States and Internationally: Environmental Scan summary' *Office of the assistant secretary for planning and evaluation* (online 2/21/2021: <https://aspe.hhs.gov/reports/drug-checking-environmental-scan>)



## Conclusion

We reiterate that health and welfare should be centralised to any regulatory or legislative response to online drug trading in Australia. Illicit drug policies, in an online context or otherwise, should aim to reduce harm, rehabilitate drug use, and support people and their families. Drug criminalisation has proven ineffective at delivering on such goals and has instead profited those supplying an illegal online market. A policy response of decriminalisation allows the Federal Government to displace illegal online trading without further punishing individual users and ex-users and improves community and social integration.

We are grateful to the committee for their efforts in setting up this inquiry and respect the complex challenges confronting this type of policy reform. Mainstream understandings and skewed media dialogue can present barriers to change. We hope the committee will carefully consider the evidence and that the final report will be able to help shape inspired policy change in the future.

SSDP UniMelb would welcome the opportunity to elaborate on this written submission and provide a verbal presentation to inquiry committee members.

Yours sincerely,

Students for Sensible Drug Policy at the University of Melbourne