

## **SUBMISSION PROPOSALS**

### **Definitions**

#### Chapter 1

“Vulnerable Persons”: In the section outlining definitions in the Bill, vulnerable persons are only limited to children, older persons and users recovering from substance abuse. As the NYC, it is felt that young persons as per the definition of youth in the NYC Act is of great importance, especially when determining preventative measure that are to be undertaken to curb the numbers who experiment with substances. This has been identified as a big challenge as the young persons who are older than 18 more often than not have their needs ignored. A similar challenge had been identified with youth in conflict with the law, most of the rehabilitative methods aimed at the youth are often provided to persons under the age of 18. It would be our proposal that this definition be expanded to be more inclusive of the youth.<sup>9</sup>

### **Prevention:**

#### Chapter 3

The bill speaks to dissemination of information to communicate and educate about the risks associated with substance abuse. As the NYC we welcome the strong tone and emphasis on prevention contained in the Bill as this is one fundamental step that is currently being widely ignored. As the Commission, we feel the following issues should find expression in the Bill when considering elements of a prevention plan, with particular reference to the youth:

#### **Drug prevention education to commence at an early age**

Information on drug and substance abuse among youths and children suggests the need to begin substance abuse prevention education early in life and to continue such education with developmentally appropriate interventions. Currently drug education is commencing at secondary education level yet there is evidence which suggest that the age of first experience with drugs has been falling around the world and in South Africa. It seems important, therefore, for the success of a prevention programme that drug abuse prevention

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<sup>9</sup> Umsobomvu Youth Fund: March 2006, Research Report: Youth in Conflict with the law – An assessment of context and intervention

education be started in primary schools. It is also at this phase when it is more likely to influence attitudes and behaviour.

### **Participation of young people and peer approach**

Young people are in many situations considered to be a target population and a problem, instead of being a resource in the prevention of drug abuse. Raising awareness of young people by providing them with essential, accurate and credible information is the first step in mobilizing their interest. Their active participation can make a difference in drug abuse prevention. There are strong indications that involving young people as preventative agents in peer-led initiatives can produce good results.

### **Life Skills**

Upon review of evaluations of primary and secondary experiences in various countries, there are suggestions that prevention approaches based on life skills are the most effective approaches. Life skills are considered to be abilities for adaptive and positive behaviour that enable individuals to deal effectively with the demands and challenges of everyday life.

The bill does contain elements of this under part 7 (2)(b), however this is only limited to increasing capacity of young people to make informed health choices and does not focus broadly on life skills.

### **Targeted approaches**

Not all youths are the same and they are not equally vulnerable. The bill should therefore define target groups to guide implementation at programmatic level. The bill should also be flexible enough to reach young people where they are and engage them in a constructive dialogue about their choices and options with respect to substance and drug abuse. That means bringing the drug abuse prevention education to streets, discos, and wherever else it is necessary to go in order to convey effective prevention messages.

that integrated approach of all government departments in terms of planning and coordination is essential for the campaign to yield an expected outcome, therefore Section 7(1) should advocate an integrated approach.

### **Parent and community involvement**

Prevention strategies should be integrated into the institutions and organizations that are closest to children and young people and also their families. The family and communities should be involved in order to reinforce the information that is communicated to young people in the context of preventive activities.

### **Treatment Facilities**

Chapter 4 and 5

The Bill deals extensively with establishment and greater regulation of treatment facilities that are established. The NYC is supportive of the regulatory mechanisms that are being adopted so as to prevent the mushrooming of rehabilitation centres using unconventional methods of rehabilitation. Section 10 (1) of the Bill gives provision for the Minister to prescribe conditions for community-based services, we are of the view that such conditions should include accreditations of both the service provider and the staff employed by service provider.

The NYC also supports the establishment of community based centres as well as out-patient treatment centres to ensure that young people that are in need of treatment are granted immediate access to these facilities closer to their homes. This can eliminate the challenge of long waiting lists for addicts wishing to enter treatment facilities as well as many being unable to attend these centres due to the exorbitant cost being required at these facilities.

### **Establishment of Local Drug Action Committee**

Chapter 9

Section 56 (1) of the Bill gives provision of establishment of Local Drug Action Committee at a municipal level and outlines the functions of the committee on Section 57. NYC welcomes the establishment of the committees, however advocate for the inclusion on the bill of the role of local government. The bill refers the role to National Drug Master Plan which is silent about the role of Local government and is not part of stake holder mentioned. This makes Local Drug Action Committees not to perform their duties effectively.

### **In Conclusion**

The NYC is largely supportive of many of the elements brought out in the Bill. It is hoped that a costing exercise on the implementability of the Bill as is a requirement of the Public Finance Management Act will be conducted for this Bill prior to its adoption. This will enable all relevant departments to be aware of what role they would be expected to play and the financial implications that will be incurred. Commitment to eradicate the scourge of substance abuse needs to move away from being elaborate statements on paper but be visible in their implementation. As our submission suggests, prevention is the one long term strategy that should be strengthened so as to prevent more young people from experimenting with these substances.