



Friends of Medicare
601-12323 Stony Plain Rd
Edmonton, AB T5N3Y5

Phone: 780-423-4581
Fax: 780-420-0435
email: fomcampaign@gmail.com
www.friendsofmedicare.org

March 31, 2016

Honorable Sarah Hoffman

Minister of Health

Dear Honorable Minister Hoffman,

We are writing today to ask the province of Alberta to safeguard the health of Canadians and the integrity of our voluntary blood donation system by enacting legislation to ban the sale of blood and plasma in Alberta.

Our members are very concerned to learn that Canadian Plasma Resources (CPR) wants to open private pay-for-plasma clinic(s) in Alberta.

We were very encouraged to see your comments in the Calgary Sun on March 30 that you are “not excited about the prospect of any pay for service,” and that “paying for essential life-saving blood, plasma, those types of things, makes me quite nervous, actually.”

Allowing this company, or any other, to pay donors for plasma conflicts with the recommendations of the four-year inquiry into the tainted blood scandal that infected over 30,000 Canadians with HIV and Hepatitis C.

The Krever report made unequivocal recommendations that must be heeded to prevent another tainted blood tragedy in this country. Specifically, the Inquiry recommended an end to a private, for-profit blood donor system in Canada, citing these five basic principles regarding how the blood system should be governed:

1. Blood is a public resource.
2. Donors should not be paid.
3. Sufficient blood should be collected so that importation from other countries is unnecessary.
4. Access to blood and blood products should be free and universal.
5. Safety of the blood supply system is paramount.

Specifically, in his report Justice Krever recommended that:

- “...the Canadian blood supply system be governed by five basic principles, [including] (b) **donors of blood and blood plasma should not be paid for their donations**, except in rare circumstances. [Krever, Vol.3, Recommendation #2 p.1047,]



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- **“Whole blood, plasma and platelets must be collected in sufficient quantities** to meet domestic needs for blood components and blood products.” [Vol. 3, Recommendation #2, p.1047]
- **“Canadian plasma should be custom fractionated, in batches consisting only of Canadian plasma,** based on specifications negotiated between the fractionator and the national blood service. These specifications should include requirements for the manufacture of the safest and the highest quality products.” [Vol. 3, Recommendation #5, p. 1051]

There are a number of risks to our national voluntary blood supply system if Canadian Plasma Resources, or any other pay-for-plasma company, are allowed to operate in Alberta:

- **Paying donors for plasma compromises the safety of plasma.** By providing a financial incentive to donate plasma, the clinic could attract donors from vulnerable populations and put the plasma at risk.
Blood or plasma donation on a voluntary basis is particularly crucial whenever the collection system is endangered by a new infectious threat, not identifiable by lab testing. The sole means to safeguard against such unknown threats is the voluntary collection of plasma from healthy citizens who have no monetary incentive to lie about their health status.
- **Paying people for their plasma could create competition with our voluntary blood system.** Paying people for their plasma creates a disincentive to donate blood voluntarily, thereby reducing our overall blood supply. The European Blood Alliance has documented that competition between voluntary non-profit blood agencies and for-profit companies that remunerated donors led to a shortage in blood supply in Austria and Germany in 2006 and 2007. Once Canadian Plasma Resources is licensed to collect plasma through payment, other for-profit companies will be able to demand similar treatment and increase the competition for donors.
- **Paying donors for plasma does not create self-sufficiency for the country.** Instead, it creates a two-tier and fragmented system for the collection of plasma. There is no justification to fracture our plasma collection system in Canada to allow a private company to profit off of Canadian blood. Doing so contravenes the Krever inquiry’s recommendation that “...the core functions of the national blood system be performed by a single operator and not contracted out to others.” (p. 1050)



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If Canada did permit a paid plasma system, we would be one of very few countries that allow the discredited practice. Plasma would be the first human material that people in Canada would be allowed to sell. As you know, the sale of organs, tissue, sperm, eggs and embryos are all prohibited in Canada.

Friends of Medicare supports a publicly-regulated, not-for-profit voluntary blood and plasma donation system in Canada as recommended by Justice Krever, the World Health Organization, the International Federation of the Red Cross and Red Crescent Society, the International Society of Blood Transfusion, the International Federation of Blood Donor Organizations, BloodWatch.org, and the European Blood Alliance

The sale of blood and plasma, or providing 'incentives' for 'donations' for blood and plasma, needs to be banned in provincial law. As you know, such bans are already in place in Ontario and Quebec.

In 2014, Ontario passed legislation forbidding companies from paying people for their plasma in response to CPR's attempts to open three locations across Canada. Bill 21, the Safeguarding Health Care Integrity Act, was passed unanimously in Ontario on December 9, 2014 and bans payment for blood and plasma donations.

At the time the legislation was passed, Ontario Health Minister Eric Hoskins said, "This government feels it's extremely important to put in place legislation that safeguards the integrity of the voluntary system that exists and has existed for so long in this province. It's a bit of a slippery slope once you start offering people compensation for donating."

We urge you to ensure that Alberta enacts our own legislation banning the sale of blood and plasma as soon as possible in order to safeguard the health of Canadians and the integrity of our voluntary blood donation system.

Sincerely,

Sandra Azocar

Executive Director – Friends of Medicare

CC: All Alberta MLAs; All Alberta MPs; Federal Health Minister Jane Philpott; Kellie Leitch, Official Opposition Health Critic; Don Davies, NDP Opposition Health Critic