



Network of Rare Blood Disorder
Organizations
Réseau des Associations Vouées
aux Troubles Sanguins Rares

November 22, 2018

Members of the Standing Senate Committee on Social Affairs, Science and Technology
Senate of Canada
Ottawa, ON
K1A 0A4

Re: Bill S-252, Voluntary Blood Donations Act (An Act to amend the Blood Regulations)

Honourable Senators,

The supporters of the Bill S-252 are either knowingly or unknowingly confusing the collection of whole blood and the collection of plasma – there are distinct differences that require Canada to leave open the option for compensated collection of plasma.

We, the Network of Rare Blood Disorder Organizations (NRBDO), feel compelled to respond to Senator Wallin's ill-named Bill S-252, the Voluntary Blood Donations Act, to offer the perspective of Canadians who rely on plasma-derived medicinal products (PDMPs) to stay alive.

Difference in Use

- Our whole blood donation system is designed to ensure Canadians have unrestricted access to a safe supply of blood when needed, for any medical reason, at no cost. The NRBDO agrees that donation of whole blood and other fresh components such as platelets, collected by not-for-profit blood establishments such as Canadian Blood Services (CBS) and Héma-Québec, must remain voluntary and non-compensated.
- Plasma is used by for-profit pharmaceutical companies to create PDMPs, such as immune globulins, which they in turn sell. The manufacture and sale of plasma products is almost entirely a private, for-profit operation, with plasma being the main raw ingredient. To say that the compensated collection of this ingredient puts our public health care system in peril, or, as Senator Wallin has suggested, could lead to an issue of National Security, is a stretch at best, and could be interpreted as fear-mongering. One could argue in this scenario that *not* compensating for plasma is unethical.
- Plasma collected from volunteer Canadian donors represents a mere 17% of the current need in this country for immune globulins, a need that is growing by about 6-10 per cent annually.¹ Canada relies on the U.S. to supply the remaining 83% of our plasma needs, which come from American paid donors.

¹ Health Canada. (2018) *Protecting Access to Immune Globulins for Canadians: Final Report of the Expert Panel on Immune Globulin Product Supply and Related Impacts in Canada*. Ottawa, ON: Her Majesty the Queen in Right of Canada, as represented by the Minister of Health.

Difference in Demand

- While the demand for whole blood and fresh blood components is generally decreasing in recent years, the demand for PDMPs continues to grow.
- There is a very real concern in the global market that demand will soon exceed supply. Should the United States ever decide not to sell plasma to Canada, or as countries not currently using PDMPs decide to open their doors to this medical advancement, Canada's heavy reliance on international plasma will put us in a very weak position to negotiate for better prices on our PDMPs, products Canadian Blood Service and Héma-Québec currently procure through a competitive tendering process. Indeed, rather than negotiating for lower prices, we may be put in a position of needing to negotiate to secure any PDMPs at all for Canadian patients.
- Increasing our plasma sufficiency is crucial, and as a Health Canada Round Table discussion on compensating plasma donors found: "No country in the world has been able to meet their need for plasma with a solely volunteer model."²

The positions on this issue held by NRBDO, and its constituent groups whose members rely on plasma-derived medicinal products for their very survival, are based on the latest medical research and are shared by similar patient organizations around the world.

The NRBDO is committed to ensuring the patient voice is heard, and working with governments, CBS and Héma-Québec to protect the safety and availability of all blood products in Canada. We urge the members of the Standing Senate Committee on Social Affairs, Science and Technology to report against Bill S-252, and we would welcome the opportunity to appear before the committee to present our views on this issue and answer questions.

Thank you.

Sincerely,



Gergana Sandeva
Chair, Network of Rare Blood Disorder Organizations (NRBDO)

² Health Canada. *Round Table Discussion on Payment of Plasma Donors in Canada – Summary Report*. April 10, 2013. <https://www.canada.ca/en/health-canada/services/drugs-health-products/public-involvement-consultations/biologics-radiopharmaceuticals-genetic-therapies/round-table-discussion-payment-plasma-donors-canada-summary-report.html>