



SUBMISSION

by the

**Canadian Union of Public Employees
(CUPE)**

to

**Health Canada's Public Consultation on the Safety
of Paid Plasma Donations**

Introduction

The Canadian Union of Public Employees (CUPE) represents over 190,000 health sector workers, including employees of Canadian Blood Services (CBS) nation-wide. CUPE recommends that Health Canada turn down Canadian Plasma Resources application to operate 10 paid donor blood and plasma product clinics. We have three rationales that lead us to this conclusion.

1. Private versus Non-Profit/Public Blood Services

To approve a new privately-run actor in blood product collection would ignore the already-existing capacity of a proven non-profit national system (Canadian Blood Services). There is no compelling reason to gamble the health of Canadians on a privately-run corporation whose compulsion to enter the blood product 'market' is to return maximum value to its shareholders.

Canadians have long been in favour of a health system that recognizes the incompatibility of private and for-profit providers, and equal and high-quality health care for all Canadians. The public and non-profit system has also been proven to deliver better quality care to more Canadians more efficiently and at a lower cost.

Again, we question what logic would speak to the need to move from a proven non-profit collection system through an existing and long-established institution to a Greenfield private company?

2. Plasma Product Demand and Domestic Production

Following from our position that plasma product collection should proceed through an expansion of the CBS's existing expertise and capacity, we believe that CBS should reverse the closure of its plasma product collection centre in Thunder Bay that was shut down in April 2012. In their media releaseⁱ at the time, the CBS notes that the centre was closed due to a "decrease in the need for plasma for transfusion" and that "CBS must plan for a reduction of approximately 10,000 units to our plasma collection program [in 2012]".

In 2013, the CBS is now arguing that there is a growing need for plasma products that they are unable to meet. We are skeptical that overall dynamics in the market for plasma products could change so drastically in less than 12 months time. Nevertheless, CUPE has long supported the expansion of domestic blood product collection and moving away from the importation of paid-blood products from the United States and other sources. CUPE recommends that CBS re-open the Thunder Bay plasma collection clinic to meet Canadians' need for plasma from domestic donors.

To meet the health and safety needs of Canadians, domestic production should be expanded through the existing non-profit producer of blood products using volunteer donors. CUPE agrees with the World Health Organization's (WHO) recommendation to all member countries that

blood collection be done with 100% volunteer donors to ensure the highest possible levels of safety for blood product consumers.

CUPE is concerned that moves to a paid donor system may have deleterious impacts on our voluntary blood donor system. We also don't know what the impact a paid donor system will have on our existing voluntary system, and there are no current plans to determine that effect.

3. The Safety of the Blood Collection System for Canadians

In the above rationales we argue that Health Canada should privilege non-profit/public actors in blood product collection, and that Health Canada should put in place policies that emphasize volunteer donors and domestic collection. CUPE holds this position not only because non-profit and volunteer blood collection are in line with values held by our members and the majority of Canadians, but because it is exactly this approach to blood product collection that ensures the safest blood system for all who rely on these life-giving human biological products.

To ensure the safety of our blood system, Health Canada should not approve further paid donor plasma product collection beyond the existing operation of the Cangene Corporation facility in Winnipeg. Federal and provincial funding should be made available to Canadian Blood Services so that its capacity can be increased to meet our plasma needs domestically through volunteer donations.

The federal government's Krever Inquiry came to the very clear conclusion that private, paid donor plasma product collection was unsafe. Justice Krever recommended that the only way the highest standards of safety could be ensured in blood and blood products collection is by the strictest government oversight and voluntary collection.ⁱⁱ

For these reasons the Canadian Plasma Resources' application should be denied.

Conclusion

There is a good reason that Canadians have fought for more than a century to remove the profit motive from our health care system. It is as simple as the fact that when private providers and the market mentality enter into operation and delivery of health care, patient health takes a backseat to profit.

Health Canada should pose the following question: Which organization is more likely to destroy an entire stock of plasma product if it received information that there was a chance that it was contaminated? Which organization may hesitate to consider the impact on their bottom line?

CUPE's position is that a private company facing financial losses - whose first responsibility is to shareholders - would not be a system where Canadians' health would be the priority.

The number one priority of our blood system must be the safety of Canadians. There can be tragic consequences if we acted otherwise.

ⁱ See: http://www.blood.ca/centreapps/internet/uw_v502_mainengine.nsf/page/Canadian-Blood-Services-announces-closure-of-Thunder-Bay-Plasma-Centre?OpenDocument

ⁱⁱ See Krever Inquiry Final Report, accessible at: http://epe.lac-bac.gc.ca/100/200/301/hcan-scan/commission_blood_final_rep-e/

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