



**Canadian Health Coalition**  
**Coalition canadienne de la santé**

251 Bank Street, Suite 212, Ottawa, ON K2P 1X3



February 19, 2016

The Honourable Jane Philpott  
Minister of Health  
70 Colombine Driveway,  
Tunney's Pasture  
Postal Location: 0906C  
Ottawa, Ontario K1A 0K9

Dear Minister Philpott:

The Canadian Health Coalition, on behalf of its member organizations, is writing you to express our strong opposition to the possible licensing of a for-profit clinic that pays clients to donate plasma in Saskatchewan.

Canadian Plasma Resources has set up a clinic in Saskatoon, Saskatchewan after being prohibited from operating in the province of Ontario when that provincial legislature unanimously passed the *Voluntary Blood Donations Act* in December 2014. The owner of Canadian Plasma Resources stated in a recent interview on CBC's *The Current* that his company is within days of receiving a permanent license from Health Canada for his clinic in Saskatoon. He also indicated that his company is in discussions with British Columbia and New Brunswick to expand into those provinces. Quebec is the other province that has passed legislation to ensure donors are not paid for their blood or plasma.

The Canadian Health Coalition believes that the introduction of a pay for plasma clinic in Canada poses a serious safety risk to our blood supply. The Canada Food and Drug Act obligates the Minister of Health to regulate and protect Canada's blood and plasma supply, and therefore we ask you to immediately prevent Health Canada from issuing a license to this clinic or revoke any license that may have been issued and to do the same for any other clinic that pays donors for blood or plasma.

Allowing this company 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.

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, p.1047, Recommendation #2*].
- **"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 is allowed to operate in Saskatchewan or in any other province:

- **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. Saskatchewan has the highest rates of HIV and Hepatitis C in the country, particularly among its aboriginal population which has poverty rates twice the rate of the non-aboriginal population.  
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**, contrary to claims by the company. Instead, it creates a two-tier and fragmented system for the collection of plasma. All of the plasma that Canadian Plasma Resources plans to collect will be exported to the United States and mixed in with large pools of donated plasma. Only plasma collected by Canadian Blood Services that is specifically marked for Canadian use is fractionated in the U.S. and then brought back to Canada. Canadian Blood Services says it has no plans to buy plasma from Canada Plasma Resources.

The Canadian Health Coalition 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 and the European Blood Alliance.

We urge you to direct Health Canada to:

- 1) Use its statutory duty to regulate payment for plasma as a safety issue, recognizing that remuneration impacts the safety of the resulting plasma products. The decision to allow or disallow compensation clearly falls within Health Canada's mandate to regulate the safety and quality of plasma products as drugs under the *Food and Drugs Act*;
- 2) Abandon the erroneous policy adopted by the previous Harper government, which purported that compensation to donors of plasma is a non-safety "corporate decision" outside of Health Canada's authority;
- 3) Deny or revoke a license to Canadian Plasma Resources, and any other companies that propose to pay donors for blood, plasma or other blood products; and,
- 3) Work with Canadian Blood Services to develop a strategy to increase unpaid plasma clinics in Canada and move toward self-sufficiency in plasma supply.

Sincerely,



Pauline Worsfold  
Chairperson  
Canadian Health Coalition

Cc: Don Davies, NDP Health Critic; Dr. Kellie Leitch, Official Opposition Health Critic; Dustin Duncan, Saskatchewan Health Minister; Sheri Benson, Saskatoon West MP; Kat Lanteigne, safe-blood advocate