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June 14, 2022

Dr. Brian Postl, Chair  
Glenda Yeates, Vice Chair  
via [feedback@blood.ca](mailto:feedback@blood.ca)

Dear Dr. Brian Postl and Glenda Yeates,

We are writing today in response to the Canadian Blood Services (CBS) bulletin issued on May 17, 2022, "Empty beds strain blood inventory," which warns the national blood inventory has declined by 25 percent since the start of April and CBS also needs more donors to grow Canada's plasma supply for patients, including those who need immunoglobulins.

In December 2021 we participated in the CBS's process, "Securing Canada's Plasma Sufficiency for Immunoglobulin – Stakeholder Engagement." The Canadian Health Coalition's (CHC) submission stated the security of Canada's domestic supply is crucial and must address combined security and safety of supply specifically at times of crisis.

CHC's mission to protect and improve public provision of health services to all patients living in Canada via Medicare includes CBS's provision of blood, plasma and plasma products for emergency conditions and for ongoing medical care. The manner in which CBS plans for security of immunoglobulin supply impacts both the safety and security of Canada's entire supply of blood and plasma.

CHC strongly opposes the "commercial sector contributing to plasma sufficiency." This adds danger to plasma products during a time of new pathogen contingency. If CBS combines higher-infectious-risk commercially collected plasma with the voluntary lower-risk plasma during fractionation by contract, Canadians lose the safeguard of sequestered lower-risk voluntarily-collected plasma so crucial in the event of a new unknown blood-borne pathogen not amenable to pathogen deactivation procedures in the fractionation process.

The drive to increase plasma collection should not compromise CBS's commitment to unpaid blood and plasma donations. Plasma collection should remain guided by the principles of the Krever Commission for Canada's national blood supply including that blood is a public resource and donors should not be paid. This is in line with the Expert Consensus Statement on achieving self-sufficiency in safe blood and blood products, based on voluntary non-remunerated blood donation issued by the World Health Organization in 2012. These measures will help ensure greater domestic security and safety of Ig supply and maintain the viability and safety of Canada's blood and plasma supply.

Increased voluntary plasma collection in Canada is crucial and requires public engagement, earned via CBS transparency and demonstration of CBS commitment to its public good [non-commercial] mandate.

Alongside increased voluntary plasma collection, installing mechanisms to achieve evidence-based utilization of immunoglobulin in Canada is an urgent measure to advance Ig self-sufficiency. Canada is misusing immunoglobulins, as the 2nd highest user world-wide due in large part to the lack of effective institutional/hospital control over and evaluation of the prescribing of Ig.

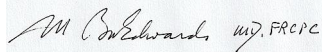
In the longer term, to achieve sustainability CBS must advance research initiatives to develop new technology for the manufacture of plasma proteins by alternative, non-plasma-dependent processes, such as recombinant technology.

We would welcome the opportunity to meet with you to discuss our concerns regarding paid plasma collection, and consider alternative measures to securing Canada's plasma sufficiency for immunoglobulin.

Regards,



Pauline Worsfold, RN  
Chairperson



Dr. Michèle Brill-Edwards  
Board member

CC: Dr. Graham D. Sher, Ellis Westwood