

## **National Union of Public and General Employees**

### **Submission to the Expert Panel on Immune Globulin Product Supply and Related Impacts in Canada**

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#### **Introduction**

The National Union of Public and General Employees (NUPGE) represents over 370,000 workers across Canada. NUPGE Components directly represent Canadian Blood Services (CBS) workers in a number of provinces: Newfoundland and Labrador, Nova Scotia, Ontario, Manitoba, Alberta and British Columbia.

The National Union's members are on the front lines in the mission to ensure Canadians have access to safe, life-giving blood products. Our workers collect, process, and deliver blood and blood products that health care workers require in the critical moment when a patient needs a transfusion or life-saving blood product.

NUPGE members are proud to be working with Canada's voluntary blood donors through Canadian Blood Services in what is now one of the safest blood systems in the world.

NUPGE is also a co-convenor of the multi-union meeting of CBS local union leadership, which gathers elected representatives to work on issues related to CBS. This meeting also includes direct dialogue with CBS management on issues affecting workers. NUPGE members, through their leadership, have clearly expressed opposition to the expansion of paid plasma and blood product facilities in Canada.

NUPGE is therefore against Health Canada continuing to license private, for-profit, plasma clinics in Canada. NUPGE believes our voluntary blood donation system is placed at risk by any proliferation of paid plasma and private for-profit blood collection in Canada. NUPGE is pleased to present this position to the Expert Panel on Immune Globulin Product Supply and Related Impacts in Canada (Expert Panel).

#### **1. Supply and demand factors that may affect the security and sustainability of the Ig supply for Canadians**

Canadian experience with for-profit and privately collected blood and blood products is forever linked with the tainted-blood scandal of the 1980's and the subsequent Krever Inquiry. This is often called the worst public health catastrophe in Canadian history.

Patients were confronted with a system that failed to provide safe blood, resulting in thousands of Canadians being exposed to infectious disease through blood and blood products contaminated with HIV or hepatitis C.

The contaminated blood leading to the tainted-blood tragedy in Canada was sourced from paid donations coming from the United States. The lessons of paid blood donation were deadly:

blood was collected for profit by private corporations and mixed in with the voluntary public supply; as many as 2,000 Canadians became infected with HIV and another 30,000 were infected with hepatitis C through this tainted blood and these tainted-blood products.

The security of, and trust in, our blood system are what safeguard our voluntary supply and are only protected if the lessons from the tainted-blood crisis are heeded. Supply currently relies on vast numbers of Canadians who freely donate their blood under an altruistic and public-good framework, not a commercial framework, which is embodied by Canadian Plasma Resources' use of payment to solicit blood. There are fundamental dangers in the proliferation of paid plasma, both in terms of targeting vulnerable populations as clients, as well as changing the paradigm of donation—from donation to transaction—which risks undermining the motive for donating among the current CBS donor base.

## **2. The potential impact of plasma collection activities on the security and sustainability of the Canadian blood supply if plasma collections were to expand significantly in Canada**

NUPGE is committed to the security and sustainability of the Canadian blood supply. We believe expanding plasma collection in Canada should be a primary focus of new initiatives by our governments, but that this must be done through the existing mandate of Canadian Blood Services. NUPGE is also very concerned that paid plasma donations collected by private for-profit companies will harm the security and sustainability of the Canadian blood supply and increase risks to patient safety.

NUPGE supports the goal announced by CBS of collecting enough plasma for Canada by 2024 through unpaid voluntary donations. 40 new CBS plasma clinics and 144,000 new voluntary donors, which are CBS targets, would strengthen Canada's voluntary blood collection system.

For-profit, paid collection, is a threat to the number of voluntary, unpaid donors, according to CBS. The danger is that rather than adding another stream to blood collection, licensing private collection that is for profit and is paying donors, severely undermines Canadian Blood Services' capacity to collect blood.

NUPGE recognizes the shortage in blood products that exists due to Canada's lack of processing capacity. We believe this should be addressed through government-led initiatives, not by subverting our current volunteer-based system by allowing paid plasma and profit to proliferate.

## **3. Current and emerging international practices and lessons learned about mitigating any potential detrimental impacts on security and sustainability identified in 1 or 2 above.**

The United Kingdom has just called an inquiry into their own tainted-blood scandal, similar to Canada's. Probably the most comprehensive study of blood safety by any country in the world has been conducted by Canada through the Krever Commission. NUPGE suggests that it is

essential that Canadian governments heed the 50 recommendations and 5 key principles as outlined by Justice Krever.

The 5 Krever principles are:

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

Today we are seeing the federal government, and some provincial governments, actively violating the Krever recommendations and principles. NUPGE believes that the Expert Panel should explicitly support the Krever findings.

Internationally, the evidence and recommendations are also clear and support the Krever findings. The World Health Organization, the European Blood Alliance, the Red Crescent and the International Red Cross—the most respected organizations dealing with safety of blood supply in the world—all recommend voluntary, non-paid blood collection.

Alberta, Ontario and Quebec have all heeded these warnings and banned paid blood donation in their provinces. These provinces represent almost three-quarters of the Canadian population. Effectively, this leaves the other 7 provinces and 3 territories, representing one quarter of the country's population, vulnerable to paid-plasma schemes as a result of Health Canada's licensing.

NUPGE feels Canada should have a comprehensive policy on paid-plasma, not a piecemeal and patchwork regime as now exists. Across the country, selling organs and human tissue is banned. Selling blood violates the spirit of this policy, and NUPGE proposes that the Expert Panel recommend including blood in this ban.

### **Summation**

In summation, NUPGE, on behalf of our 370,000 members and our front-line CBS workers, calls on the Expert Panel to:

- Recommend that federal and provincial governments follow the recommendations of the Krever Commission, including banning paid blood donations.
- Recommend the federal and provincial governments commit to increase the capacity and resources of Canadian Blood Services to allow CBS to expand voluntary blood collection to meet the needs of Canadian patients.
- Recommend that the federal government implement national legislation that standardizes existing provincial legislation banning payment for organs and tissue and that includes blood and blood products in the list of items deemed illegal to sell in Canada.
- Recommend that Health Canada, in the interests of protecting the voluntary blood collections system, and given the importance of ensuring the safety and integrity of our blood system, ban future licensing of paid plasma clinics and take steps to revoke existing licenses.