
Via e-mail: Minister_Ministre@hc-sc.gc.ca

March 25, 2013

The Honourable Leona Aglukkaq, P.C., M.P.
Minister of Health
Health Canada
Brooke Claxton Building, 16th Floor
70 Columbine Driveway
Tunney's Pasture, Mail Stop: 0916C
Ottawa, ON K1A 0K9

Dear Minister Aglukkaq:

On behalf of the Canadian Nurses Association (CNA), the Canadian Association of Nurses in AIDS Care (CANAC), the Canadian Association of Nurses in Oncology (CANO) and the Canadian Council of Cardiovascular Nurses (CCCN), we are writing to share our concerns about new proposals to establish for-profit plasma donation centres. For several reasons, we urge you to undertake a comprehensive assessment and consultation process on this issue with health-care providers, provincial and territorial governments, stakeholders and the Canadian public.

Protecting Canadians' access to a safe and stable blood supply is paramount. To do so, and to ensure transparency and accountability, any decisions to expand for-profit and incentive-based blood and plasma donations must be undertaken in consultation with health-care providers and the public. Canadian blood and plasma sectors, including Canadian Blood Services and private plasma collection enterprises, must continue to operate within stringent national, regional and international regulatory regimes that support safe and effective products. They must also ensure that their actions do not compromise the health of those who receive blood components or plasma products, while taking all reasonable steps to eliminate adverse reactions and events, including the transmission of pathogens.

As you address this issue, while respecting the impact assessments of your ministry, we urge you to consider the following key questions:

- Will an incentive-based competition for donors compromise the collection of blood products necessary for transfusion?
- What effect will expanding for-profit clinics have on not-for-profit blood donation?
- What specific actions will Health Canada take to prevent the unintended consequences (e.g., reduced participation) in the not-for-profit blood donation system?
- What mechanisms will be in place to intervene, should incentive-based competition for donors result in a reduced not-for-profit donor pool?
- What will you do to assure Canadians and health-care workers that the for-profit collection of blood products will be subject to rigorous safety standards, appropriate oversight and regulated accountability?
- How will plasma products collected by for-profit donation centres be used?
- How can Canadians and health-care providers be confident that for-profit plasma donations will not be sold back to the public health-care system at an inflated cost that would add to provincial/territorial health spending?

Licensed donation-centre operators and health-care providers who work in blood services have a professional duty and legal accountability to act in the best interests of those who donate and receive blood and plasma products. At the heart of this question, then, is whether any action undertaken to include for-profit donation will enhance Canadians' access to safe and effective blood components and plasma products. We are greatly concerned that introducing additional competition that would pay blood donors will further compromise the already scarce donations and threaten the safety and security of this vital, life-saving resource.

We urge you to consider these concerns as you address proposals to establish for-profit plasma donation centres, and we call on you to uphold the rigorous standards in place to protect product security and patient safety so essential to our not-for-profit public health-care system.

Sincerely,



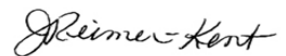
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