14th February, 2013

Secretary of the Expert Committee on the
Selection and Use of Essential Medicines
World Health Organisation
Office of the EML Secretariat
Medicine Access and Rational Use (MAR)
Department of Essential Medicines and Health Products
20 Avenue Appia
CH-1211 Geneva 27

Via Email: emlsecretariat@who.int

Dear Sir or Madam

We write to express our position in regard to the application submitted by AABB to request listing of Whole Blood and Red Blood Cells on the WHO Model Essential Medicines List (WHO EML) and the WHO Model Essential Medicines List for children referred to hereafter as the WHO EML.

The Asia Pacific Blood Network (APBN) was established in 2006 to promote blood safety and efficiency of blood service operations among its members. It encourages a close cooperative approach to advance regional harmonisation and co-operation in blood related matters and does this with an appreciation that members operate in different domestic contexts. The APBN provides a forum for members to exchange ideas and insights and compare operational practices. Supporting the principle of Voluntary, Non-Remunerated Blood Donation (VNRBD), the APBN seeks to provide strategic leadership in the Asia Pacific region and to support policy development. The Network provides a regional voice and perspective on blood-related themes.

The Members of APBN are:

- Hong Kong Red Cross Blood Transfusion Service
- Blood Services Group, Health Sciences Authority, Singapore
- Australian Red Cross Blood Service
- Beijing Red Cross Blood Center
- Japanese Red Cross Society Blood Service
- Republic of Korea National Red Cross Blood Service
- New Zealand Blood Service
- Taiwan Blood Services Foundation
- National Blood Centre - Thai Red Cross Society
- Macao Health Bureau
APBN’s vision and mission are as follows:

**APBN VISION**

*Every patient in our region has access to safe blood and blood products appropriate to their needs, donated by voluntary non-remunerated blood donors, in an environment that safeguards their health and safety.*

**MISSION**

*To advance the self-sufficiency of blood systems in our region by capturing and sharing the collective expertise, wisdom and knowledge of our members*

The APBN seeks to work in close partnership with other networks within the global blood community with a view to realise this vision and mission and to promote our objectives for safe and sustainable blood systems fully based on voluntary non remunerated blood donation.

The APBN Executive has had the opportunity to review both the application and some of the comments and concerns expressed by other blood sector organisations. The APBN Executive shares the concerns already expressed by other organisations that relate to

- The potential for commodification of whole blood and red blood cells,
- The risk of undermining voluntary non-remunerated blood donation,
- The observed variable outcomes consequent to the listing of plasma derivatives on the WHO EML
- The potential implication on national and regional goals of self-sufficiency
- The potential adverse impacts this may have in developing countries in our region

We believe there is a need for full global consultations, discussion and open debate on this very important issue. Given the short time frames, we have not had the opportunity to consult appropriately with either our own members or the wider global blood community but have sufficient concerns as an Executive to request WHO more extensively consult and consider the full ramifications of the WHO EML application for the inclusion of Whole Blood and Red Blood Cells before any decision is made.

Yours sincerely

Dr Che Kit Lin
Chair
Asia Pacific Blood Network

and

Chief Executive Officer & Medical Director
Hong Kong Red Cross Blood Transfusion Service

cc: APBN members
APBN Secretariat