Dear Sir or Madam,

We are writing on behalf of four Red Cross National Societies Blood Services in regard to the application for the inclusion of Whole Blood and Red Blood Cells on the WHO Model Essential Medicines List and the WHO Model Essential Medicines List for children.

We have reviewed the proposal submitted by AABB and, while supportive of its overall intent to recognize the essential nature of blood in health care and to increase global access to and availability of safe blood, we consider that the proposal as it stands may also have the potential for a number of unintended but negative impacts which have to do with the unique source of blood (scarce and human-derived, which sets it apart from most if not all other “medicines” on the list).

Specifically our concerns relate to listing blood as a medicine without more clearly describing its source. Governments, in order to meet the goal, should invest in building a stable donor base rather than by buying / importing blood or blood products. Without this specification, adding blood to the list has the potential for the erosion of the principle of self-sufficiency and of voluntary non-remunerated blood donation (VNRBD) as a fundamental element of a safe blood supply, and of existing donor bases. We refer to the long standing WHO and IFRC policies of VNRBD, protection of blood donor safety and promotion of national self sufficiency (as outlined in the WHO resolution WHA63.12: Availability, safety and quality of blood products), the VNRBD aspect of which should be made more clearly in the proposal.

In conclusion, while we support the overall intent of the proposal for the above reasons we do not support the inclusion of Whole Blood and Red Blood Cells on the WHO Essential Medicines List at this time. This should allow for a more comprehensive discussion to be undertaken by the global health and blood community, particularly including developing countries, to facilitate a clear and shared global view on the implications of adding blood to the WHO EML and of what WHO expects from countries when they accept blood to be ‘essential’.

Yours sincerely

Dr Wolfgang Mayr, Medical Councilor, Austrian Red Cross Blood Service
Dr. Philippe Vandekerckhove, CEO, Belgian Red Cross-Flanders Blood Service
Dr Erhard Seifried, Executive Director, German Red Cross Blood Transfusion Service
Dr Elizabeth Vinelli, Director Medico, Honduras Red Cross National Blood Centre