To whom it may concern

Today being the last date for submitting the comments of AABB, American Red Cross, Canadian Blood Service and ISBT on addition of whole blood cells to WHO Model Medicine List and WHO Model Essential List and WHO's comments (First Draft) we are submitting our opinion.

Before we address on the aforesaid comments, we introduce ourselves. We are neither blood bank, neither attached to any transfusion service nor a pharmaceutical company, we are a hundred percent community based voluntary organisation working in the field of motivating, recruiting and retaining voluntary blood donors to achieve hundred percent voluntary blood programme. Our vision is to abolish commercialisation in blood banking. We believe Blood is not a merchandise. It is a gift of love which should flow from healthy to ailing as a natural social process to maintain the river of life flowing in all its glory singing the songs of humanism. It is a service which should be protected from the greed of the commercial world.

According to the dictionary definition, the Drug Rule and Pharmacopeia Blood is neither a drug nor a medicine. In some countries Blood comes under Drug Rule. It should be brought out from the clutches of Drug Rule.

According to the text books of Transfusion Medicine, blood is a living tissue and blood transfusion is tissue transplantation.

The proposal of AABB and others will open the flood gate of commercialisation of blood jeopardising the WHO resolution no WHA 28.72 of May 29, 1975 and WHA resolution no WHA 58.13 dated May 23, 2005. We refer to the famous book Gift Relationship by Titmuss, Blood by Star and Transfusion Medicine for Clinicians Ed Dr C Shivram (Chapter II) to find the evils of commercialisation. Countries like Japan, Portugal burnt their fingers depending on commercial blood sellers.

We, therefore, strongly advise WHO not to include Blood and Blood Products in the WHO Model Essential Medicine list. The contention of AABB and others should not be acceded to.

We have a quarterly news letter "Gift of Blood" which is now 27 years old. We will write elaborately against this more in our subsequent issue. Blood should not be a merchandise.

(Debabrata Ray)