



Canadian Blood Services
Soci t  canadienne du sang

**ORAL PRESENTATION BY
IAN MUMFORD, CHIEF OPERATING OFFICER
CANADIAN BLOOD SERVICES
TO
THE STANDING COMMITTEE ON JUSTICE POLICY
REGARDING
THE EMERGENCY MANAGEMENT STATUTE LAW
AMENDMENT ACT 2006
BILL 56**

My name is Ian Mumford and I am the Chief Operating Officer of Canadian Blood Services. I am joined today by Dr. Peter Lesley, Medical Director for our Ottawa site, and Ayanna Ferdinand, one of our in-house legal counsel.

We are here today to make a presentation to you with respect to the application of Bill 56 on Canadian Blood Services as Canada's national blood operator.

I would like to stress on the outset that Canadian Blood Services firmly believes in taking a proactive approach to emergency planning. We believe in the importance of protecting the health, safety, and welfare of Ontarians, and Canadians, in the event of an emergency. In fact, Canadian Blood



Canadian Blood Services
Soci t  canadienne du sang

Services is in the midst of our own pandemic influenza planning as we are mandated with delivering vital blood and blood products to hospitals across the country. I am here today to express our concern that Bill 56, if enacted as presently drafted, has potential to divert our professional staff away from delivery of the national blood system. Our view is, that in the event of an emergency situation such as is contemplated in Bill 56, our staff, including nurses and physicians, will be expected to play a vital role in sustaining Ontario's and other provincial health systems.

I would like to tell you a bit about Canadian Blood Services. Canadian Blood Services (or CBS as we call ourselves) is Canada's national integrated blood operator. CBS is a unique provider of health care services in Canada. It is the only provincially funded provider of a vitally necessary health care service that operates on a national basis within 12 provincial and territorial jurisdictions (excluding Quebec). We are an integral part of the health system, which, in part, Bill 56 aims to protect. For instance, red cells and platelets are necessary to address acute blood loss during trauma or major surgery and platelets are sometimes required for women during labour.



Canadian Blood Services
Soci t  canadienne du sang

In the wake of the Krever Commission, the mandate provided to CBS is to be responsible for a national blood supply system that assures Canadians access to a safe, secure and affordable supply of blood, blood products, and their alternatives. CBS is responsible for recruiting and managing blood donors, whole blood and plasma collection, processing, testing, storage and distribution, and inventory management of blood and blood products.

The provincial and territorial Ministers of Health, including Ontario, appoint the CBS Board of Directors, approve our corporate plans, and provide our annual budgets. However, CBS operations are regulated by the federal government through Health Canada.

How does this system work? I would now like to explain a little of what we do as a blood operator to give you an appreciation of the interaction of this proposed legislation and our processes and staff. CBS collects from Canadians approximately 870,000 units of whole blood annually from 42 permanent collection sites and more than 14,000 blood donor clinics



Canadian Blood Services
Soci t  canadienne du sang

throughout Canada. CBS ships blood products to nearly 750 hospitals across Canada. Nearly 50% of blood collections are obtained from Ontario blood donors.

CBS relies on our professional staff, our volunteers, our blood donors, and our facilities to operate and manage the national blood supply. Currently, across Canada CBS employs 62 physicians, 597 registered nurses, and 490 medical laboratory technologists. In Ontario, CBS has 304 nurses, 22 physicians and 158 medical laboratory technologists on whom we greatly depend.

Our medical and technical staff perform a range of critical functions essential to delivering on our mandate to ensure the safety and adequacy of the nation's blood supply. Given the highly regulated nature of our business, many of the critical functions must be performed by doctors, nurses, or technologists. For example, a nurse can only perform eligibility assessment of donors; a physician can only perform review of donor health status; and a technologist can only perform certain steps in the production



Canadian Blood Services
Soci t  canadienne du sang

process. For specific functions, only those people who have the required qualifications can perform the work. As I mentioned previously, we are highly regulated by Health Canada and we are, therefore, not permitted to substitute other staff or volunteers to perform those duties.

CBS has made planning for pandemic influenza a priority. We have determined that a pandemic would have significant impact on the availability of blood and blood products, principally due to its impact on staff and donor availability. The breadth of authority given to Cabinet with respect to emergency orders in Bill 56 greatly concerns CBS. Cabinet may have the authority to divert CBS's medical, nursing and technical professional staff and requisition facilities outside CBS. Cabinet may also have the authority to prevent CBS from transporting vital blood and blood products to hospitals. We believe that Bill 56 directly impacts CBS's ability to ensure essential services and facilities to deliver on our mandate for a safe, secure, and adequate blood supply. As noted previously, if CBS does not have adequate medical and professional staff to perform critical



Canadian Blood Services
Soci t  canadienne du sang

functions, CBS will not be able to maintain operations and deliver safe blood and blood products to Ontarians and Canadians.

In light of these concerns, CBS respectfully requests, to the members of this Committee, an exemption from the orders in Bill 56 that affect CBS's staff, facilities and ability to transport blood and blood products.

I would like members of the Committee to know that, in addition to this presentation to the Committee, CBS has written directly to Minister Kwinter requesting the opportunity to work directly with Ministry staff to ensure that application of Bill 56 meets the needs of Ontario in the event of a declared emergency while preserving CBS's ability to exercise its mandate as Canada's national blood operator.

CBS supports the purpose of this Bill. The promotion of public good can be achieved by protecting the health, safety and welfare of the people of Ontario in times of declared emergencies. Consistent with this purpose, CBS wants to find a solution where the functioning of the blood system is



Canadian Blood Services
Soci t  canadienne du sang

not unduly compromised but, also, where possible, it is supported by legislation so as to ensure the continuity of service that may be required by hospitals in Ontario and elsewhere across the country.

CBS greatly appreciates the opportunity to present to you today. The safety and supply of the blood system must be an integral part of emergency planning. CBS commends the Government of Ontario for proactively addressing emergency planning in legislation to ensure the protection and well-being of Ontarians. As a national blood operator, we would seek your consideration and support to ensure that Bill 56 will accommodate the unique aspects of Canadian Blood Services.

Thank you.