

File BLH/9

(13)

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COUNCIL OF EUROPE: DRAFT RECOMMENDATION ON PREVENTING
TRANSMISSION OF ACQUIRED IMMUNE DEFICIENCY SYNDROME
FROM BLOOD DONORS TO PATIENTS

You have asked for comments on the draft recommendation.

Our main difficulty is with the first paragraph of recommendation I. Whilst we would agree that it is theoretically desirable to avoid the use of large-pool coagulation products wherever it is medically appropriate to do so, this is only feasible if a satisfactory alternative product is available.

In this country, a breakdown of material used for the treatment of haemophilia A is as follows (all figures approximate):

NHS single-donor cryoprecipitate	17%
NHS large-pool FVIII concentrate	33%
Imported large-pool (mostly USA) FVIII concentrate	50%

From these figures it can be seen that there is no option but to treat the majority of our haemophiliacs with large-pool products and thus it could be argued that the use of such products is specifically indicated for medical reasons since the risks of non-treatment are greater than the risks of treatment. However, this is a rather dubious "let-out" and I think we should prefer to see the recommendation re-worded viz:

To avoid, wherever possible [practicable] the use of coagulation factor products prepared from large plasma pools: this is especially important for those countries where self-sufficiency in the production of such products has not been achieved.

On the latter point, the implication is that the need to avoid large-pool products may be lessened if a country is self-sufficient in blood products. Quite how true this is must be a matter for conjecture. However, this country is moving steadily towards self-sufficiency and when this has been achieved, presumably the obligation to avoid the use of large-pool products may be lessened.

Some European countries use small-pool products (freeze-dried cryoprecipitate) prepared in their national fractionation facilities. For a discussion of why such products are not manufactured in this country please see page 2 of the informal report prepared by Dr Gunson.

The remaining recommendations pose no problems for us.

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