

## 8. Donor incentives & compensation



**The specific nature of plasma donation requires a novel approach to donors. An effective plasma collection programme requires building long term relationships with donor communities.**

Doing this requires providing potential donors with clear information about the positive impact a person can make on someone's life by giving plasma. This can be supported by incentives that recognise the substantial commitment and inconvenience that donors make when they donate plasma.

Today some 24 EU countries have schemes to cover costs incurred by plasma donors or compensate them for their effort and the inconvenience related to donating, following the principle of Voluntary Unpaid Donation (VUD).<sup>15</sup>

## Compensation policies & practices

### Donor compensation within voluntary unpaid donation guidelines

**Plasma-derived medicines help patients living with a range of rare diseases that can only be treated by these therapies. They are also used in everyday medicine, emergency and critical care situations and in preventive medicine.**

In their policies and regulations European countries always align with the principles of voluntary unpaid donation of blood and blood components, set out in the European Commission's report on the topic. It presents a comprehensive review of voluntary unpaid donation practices and policies across the region<sup>16</sup>.

At the same time, most countries have incentive schemes to recognise the effort and inconvenience people who donate plasma. In practice, 'compensation' to donors includes meal vouchers, days off work, reimbursement of transport costs, refreshments, fixed rate allowance and other benefits.

### Tokens and in-kind compensation across Europe

A multi-country survey presented in the European Commission report on voluntary unpaid donations notes that it is common practice in most EU countries to give donors refreshments (25 + Lichtenstein and Norway); or small tokens such as pins, pens, towels, t-shirts and mugs (22 countries). Donors in half of EU countries reimburse donors for travel costs and give time off work in the public and private sectors.

Some 13 countries report guiding principles for compensating donors of blood and blood components. In general, principles are set out in national laws, decrees or non-binding recommendations, and define the type of compensation and other practices are allowed, and the circumstances.

Compensation values for donating blood and blood products are reported at €15-30 (Austria, Czech Republic, Germany, Latvia, Romania). In Bulgaria and Czech Republic, maximum values are defined as a percentage of the national minimum wage.

The reported maximum values of refreshments and small tokens range between €1-10. Food vouchers are offered in seven countries. Reported maximum values are €1.4-4.1. Romania sets a fixed value of €15 for food vouchers.

For travel cost reimbursement for donor to travel to and from the place of donation, some countries cover actual costs; offer a cost per kilometer traveled; a fixed maximum value for the reimbursement or lump sum, irrespective of the actual costs.

In most EU countries donors get time off work. This varies between one day or less; to the time needed for the donation; or two days off.

In reality, all these ways of compensating donors have a monetary value. Yet compensation as a direct allowance, to compensate for expenses and inconvenience, seems to be the most efficient approach to encourage more plasma donations.

## Monetary compensation

Several countries reported practices which involve the transfer of money other than for reimbursement of travel or medical costs (Austria, Bulgaria, Czech Republic, Germany, Latvia, Lithuania, Netherlands, Poland, Sweden). They compensate loss of earnings or the inconvenience related to donation, or are fixed sums of money. Fixed sums are irrespective of the costs actually incurred by the donor for the donation.

In Austria, Bulgaria and Poland, the transfer of money is only allowed under certain circumstances, such as:

- In emergency cases (Austria, Bulgaria, €23 per donation)
- Donation of rare blood groups (Poland);
- Donation plasmapheresis and platelets (Austria); platelets (Bulgaria), €46 per liter of blood passed through the device), or of anti-D plasma (Poland)
- Donations for the production of vaccines, immunoglobulins, research and diagnostics (Bulgaria) – €40 per donation.



## The patients' voice on compensation

**The Platform for Plasma Protein Users is a group of seven European patient organisations, representing 80,000 known patients in Europe that are treated regularly with plasma protein therapies; and other people with related conditions, totaling an estimated population of 650,000 people.**

This group feels that it is not realistic to rely solely on voluntary non-remunerated plasma donations to guarantee a stable supply of plasma protein therapy medicines for patients – a situation that could evolve into a major public health issue.

It sees no conflict in having plasma collected in a country from the whole blood collection system as well as from donors who are compensated to give at dedicated plasma donation centres.

Given that the majority of plasma-derived medicines distributed worldwide are based on plasma that is given by donors [outside Europe] who are remunerated to give plasma through plasmapheresis at 20-25€ per donation.

(Source: PLUS opinion summarized in 'EU-wide overview of the market of blood, blood components and plasma derivatives focusing on their availability for patients' Creative Ceutical Report, revised by the Commission to include stakeholders' comments. [https://ec.europa.eu/health/sites/default/files/blood\\_tissues\\_organ/docs/20150408\\_cc\\_report\\_en.pdf](https://ec.europa.eu/health/sites/default/files/blood_tissues_organ/docs/20150408_cc_report_en.pdf)).


## Specific incentives for plasma donors in Europe

A report by the European Commission<sup>7</sup> highlights 24 countries that provide some form of incentive to donors of plasma and blood platelets: Austria, Belgium, Croatia, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Ireland, Italy, Latvia, Lithuania, Luxembourg, the Netherlands, Norway, Malta, Poland, Romania, Spain, Slovenia, Sweden, and the United Kingdom. Incentives include:


- Reimbursement of medical costs
- Compensation for effort and inconvenience linked to loss of earnings
- Other forms of incentives
- Free physical check-up
- Food vouchers
- Time off work
- Reimbursement of travel costs
- Small tokens
- Refreshments

## Fixed compensation not directly related to actual donation costs


In some countries, donors can receive a fixed compensation that is not directly related to actual costs incurred. Some examples:

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-  **Belgium's** official documents on blood, platelets and plasma refer to voluntary unpaid donations. Donors employed in the public sector are allowed leave from work for the duration donation plus a maximum of two hours of travel.


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  -  **Denmark's** policy specifies voluntary, non-remunerated donations. Regional authorities, which run the Danish public hospitals, give a small fee per donation to the local donor-association to cover administrative and publicity costs.


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  -  **Estonia's** guiding principles mention the possibility of giving incentives to donors of blood and blood components.


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  -  **Greece** says that giving donors small souvenirs, soft drinks and travel costs is compatible with its voluntary and unpaid blood donation rules.


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  -  **Italy's** policy allows public and private sector employees the day off when they donate blood or plasma; donor associations receive specific payments per donation to cover administrative and publicity costs.


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  -  **Latvia's** guiding principles cover incentives to donors of blood and blood components, and policies to promote self-sufficiency of blood and blood components.


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  -  **Lithuania's** guidance covers similar incentives for donors. Depending on the volume donated, donors may receive a compensation of up to two days of average salary.


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  -  **Finland** specifies travel expenses may be reimbursed to the donor, within its voluntary and unpaid framework.


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  -  **The Netherlands** specifies that plasma is to be given by voluntary donors, who may receive compensation which will not be beyond a reasonable cost of expenses incurred.

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  -  **Poland's** blood and plasma donors are offered a recovery meal and can make a modest tax deduction and in some cases two days off work.

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  -  **Slovakia's** incentive policy is enacted by each city; employers may recognise their employees' efforts with a financial bonus or a holiday allowance.

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## Guidelines for country plasma donor compensation policies

### Oviedo Convention:

#### Principle of ‘prohibition of financial gain...’

In considering the creation of a national policy to govern blood plasma donation and use – specifically issues of donor compensation – the Convention on Human Rights and Biomedicine (Oviedo Convention) offers guidance<sup>17</sup>. It sets out the principle of prohibition of financial gain with respect to human body and its parts from living or deceased donors.

The Council of Europe’s guide to implementing of the principle provides a useful summary and definitions on ‘compensation’ and ‘reimbursement’ in the context of voluntary unpaid donations.

### The principle states,

**‘...the human body and its parts shall not give rise to financial gain’.**

According to the guide, this does not prevent compensation of donors for loss of earnings, and reimbursement of any other justifiable expenses. It states that the donation should be financially neutral for the donor, and that rules prohibiting financial gain do not hinder covering of a justifiable fee for medical or related technical services in connection with the donation.

### The Convention:

#### Key points for plasma compensation

- States that reimbursement of expenses incurred and compensation for effort made and inconvenience is acceptable<sup>18</sup>, similar to the report: Human bodies: donation for medicine and research of the Nuffield Council on Bioethics (2012).<sup>19</sup>
- Calls for financial neutrality for the donor. This permits direct reimbursement and compensation of costs related to a donation, distinguishing between ‘reimbursement’ – expenses such as travel and related costs; and ‘compensation’ – that can be in the form of an allowance.<sup>20</sup>
- States that where fixed-rate compensation is applied, its implementation must be specified in national law, with an upper limit for compensation. If an upper limit is not in the law, it should be set by an independent body created by national law<sup>21</sup>; and the scheme must not be an inducement to donate.<sup>22</sup>
- Calls for measures to minimize the risk of harm to donors resulting from donation, such as national registers or traceability systems to limit how frequently a person can donate.<sup>23</sup>

## The case for 'reasonable proportional monetary compensation or allowance for donors' expenses and inconvenience: lessons from the from the European Blood, Cells & Tissues Directive

The EU Directive on Tissues and Cells, offers useful lessons that can be applied to compensation for plasma donations. The Tissues Directive leaves countries to define conditions for compensation, saying that 'donors may receive compensation, which is strictly limited to making good the expenses and inconveniences related to the donation'.

It notes that the degree of inconvenience and the effort required for different types of donations differ considerably – for example oocyte cell donors are compensated with sums of €1,000 or more, where sperm donors are compensated at far lower amounts in most European countries; the UK Human

Fertilization and Embryology Authority defines expense limits of £35 for sperm donors and £750 for egg donors, per donation. In contrast, the Blood Directive does not include this type of provision.

In practice, donors in some European countries are compensated with tax benefits, paid days off work in the public sector or even monetarily for donating – for example in Austria, Czech Republic, Germany and Hungary. It will be useful that these types of reasonable proportional monetary compensation for donors' expenses and inconvenience are recognised. This will help countries secure more plasma donations for the benefit of their patients..<sup>24</sup>

## Examples: compensation policies

### Compensation policy of a donation centre in Czech Republic

#### Financial compensation

Request a refund for your costs and you will receive CZK 700 for one subscription \*.  
You can get up to CZK 1,400 a month.

\* On the first visit, you will receive a refund of CZK 400 for one collection.  
On the second visit, you will receive a refund of CZK 1,000 for one collection.  
On subsequent visits, you will always receive a refund of CZK 700 for one collection.

##### Loyalty programme

With regular plasma donations, you collect points for the loyalty programme. You can choose one of our practical gifts.

##### Tax relief

Instead of direct financial compensation, you can opt to reduce your tax base by up to CZK 3,000 for each collection as part of a non-contributory donation.

##### Paid day off

After subscription from us, you will receive a confirmation of the subscription for your employer. By law, you are entitled to a day of paid leave.

##### Health overview

Regular donations will allow you to have a good overview of your health. We will test you for selected infectious diseases and

you will be able to consult with an expert on a regular medical examination.

##### Lunch Voucher

Lunch to a restaurant near the donor centre with a voucher worth CZK 200.

### Compensation policy of a donation centre in Czech Republic

#### Financial compensation for donations

For each successful subscription, you will be paid a refund of CZK 700, and for the first subscription, an additional CZK 200 as compensation for registration.

\* Donations can be made once every 14 days. The donation is governed by the provisions of §32 paragraph 2 of Act 373/2011 Coll. on specific health services, according to which the person collected blood for blood production for the production of blood derivatives and for human use according to other legal regulations and for its collection does not have the right to financial or other compensation, except for purposefully, economically and demonstrably spent expenses related to the collection of his blood, which this person requests, in total up to a maximum of 5% of the minimum wage.

### Compensation policy of a donation centre in Austria

#### OVERVIEW PERSONAL TIME COMPENSATION

##### Your personal time compensation

For each donation in the Plasma Donation Center you will receive a 25 € compensation for your time spent. You can donate plasma up to 50 times per year.

##### Overview

The following compensations are provided for your time and loyalty.

DONATION 1-5	DONATION 6-10	DONATION 11-20	DONATION 21-30	DONATION 31-40	DONATION 41-50
25 EURO	25 EURO	25 EURO	25 EURO	25 EURO	25 EURO
25 EURO	25 EURO	25 EURO	25 EURO	25 EURO	25 EURO
25 EURO	25 EURO	25 EURO	25 EURO	25 EURO	25 EURO
25 EURO	25 EURO	25 EURO	25 EURO	25 EURO	25 EURO
25+15 EURO	25+15 EURO	25 EURO	25 EURO	25 EURO	25 EURO
Valid in the reference year:					
		25 EURO	25 EURO	25 EURO	25 EURO
		25 EURO	25 EURO	25 EURO	25 EURO
		25 EURO	25 EURO	25 EURO	25 EURO
		25 EURO	25 EURO	25 EURO	25 EURO
		25+15 EURO	25+15 EURO	25+15 EURO	25+40 EURO

DONATION NUMBER

EXPENSE ALLOWANCE

BONUS

### Compensation policy of a donation centre in Germany.

Donations made are voluntarily and generally free of charge. But as a permanent donor, you will receive a lump-sum allowance for the time you have spent in our blood donation centre.