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## Egypt: Health Ministry & Commodification of Medical Services

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Since the 3 July coup (2013), the Egyptian administrative apparatus, particularly ministries and service authorities, has been at stake, as the new ruling regime differently views the state's role in provision of services, where the statement promoted by the coup leader, "'You will pay' means 'You will pay'", has been adopted by the government as a key approach.

Accordingly, the legislation machine has issued a series of laws and decrees that actually deprive the Ministry of Health of its mandate over its main traditional functions, including the universal health insurance laws, the Egyptian Authority for Unified Procurement, Medical Supply and Technology Management (AUPP), the compulsory training, and others, which all aim at investment and profit-making, taking advantage of the state's powers to monopolize the provision of medical services and benefit from exemption.

This raises an important question about what has remained of the role, responsibilities and terms of reference of the Ministry of Health; and whether the ministry has actually been transformed into an investment authority that only seeks to make profits?

*The answer to this question consists of two parts:*

The first part is related to what has remained of the traditional function of the Ministry of Health, where:

The answer was clearly stated in a statement by the official spokesperson of the State Information System (SIS) in the context of commenting on the Universal Health Insurance law, where he briefly stated that, "The role of the Ministry of Health shall be limited to provision of ambulance services and preventive medicine after the new health insurance law enters into force!"<sup>1</sup>

The second part is related to the new roles of the Ministry of Health, and whether it has actually been transformed into a commercial entity that performs investment services, where this paper will deal

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<sup>1</sup> Report on actual launch of the universal health insurance law in Egypt, SIS, 15 November 2020, [link](#).

with in three main axes: the Health Ministry's role in commodifying medical statistics and provision of health data (the '100 Million Seha' initiative as an example); the Health Ministry's role in commercialization of experimental medicine services (the clinical trials as an example); and the Health Ministry's role in commodifying human health services (the plasma project as an example):

### First: Health Ministry's role in commodifying medical statistics and provision of health data: (the '100 Million Seha' initiative)

The role of the Ministry of Health in medical statistics is a genuine role that it plays in order to strategically plan for undertaking its function, find out the shortcomings, and decide what it should do in the face of new diseases and contemporary needs.

However, what the Ministry of Health has recently been doing with the health statistics, is closer to performance of a commercial mission that helps establish alternative entities and move the information it collects to them, despite the fact that collection of the general health statistics must be carried out exclusively by the state through the Ministry of Health, in a framework of secrecy due to its significance and seriousness.

In light of the government's lack of transparency, the health entities that the post-coup regime has created in Egypt exploit the statistics that the Ministry of Health collects for investment and commercial purposes<sup>2</sup>, as these authorities started to engage in partnerships with international bodies in their field of work, according to the official statistics that they obtain, in a way that may pose threats to the lives of the general public, for violating the secrecy rules required in official statistics.

*To indicate how dangerous this role may be, we will shed light on some projects in this regard:*

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<sup>2</sup> The key authorities that have replaced the Ministry of Health include: the General Authority for Health Insurance (GAHI), the General Authority for Healthcare (GAH), the General Authority for Healthcare Accreditation and Regulation (GAHAR), the Egyptian Authority for Unified Procurement, Medical Supply and Technology Management (AUPP) and others.

## 1: The Egyptian Genome Project

Among the most prominent projects that depend on medical statistics, and the most dangerous of them all, is the Egyptian Genome Project<sup>3</sup>, which works to prepare a map of the Egyptian human genome, decipher the Egyptian genetic code, in preparation for revealing the history and nature of diseases of the Egyptians, monitoring the genetic differences that distinguish them from other peoples, and others.

However, Egypt's coup leader Abdel Fattah al-Sisi objected to some controls added by the House of Representatives to the bill that regulates clinical trials, especially the ban on sending human samples abroad, as Sisi's letter of objection stipulated that: "...the consideration that the bill took into account regarding the prohibition of sending human samples abroad and put severe penalties (imprisonment + fine) for violations is aimed at preventing uncovering the Egyptian genes and tampering with them, but I showed that this ban is not supported by reality as the Egyptian genes have already been studied by the Naval Medical Research Unit (NAMRU) Foundation<sup>4</sup>, and there are more than 10 million Egyptians abroad who can easily provide their genetic makeup."!

This is a clear indication of the regime's underestimation of the controls of the project. Also, it bears an indication of an intention for open external cooperation against the secrecy nature of the project.

The Egyptian Genome Project was launched without legal coverage that can guarantee the rights of people to preserve their lives and dignity and control the use of their medical data and genetic information, in contravention of the requirements of the Universal Declaration on the Human Genome and Human Rights, issued by the United Nations Educational, Scientific and Cultural Organization (UNESCO) at its 29th session in 1997, which stipulated in Article 5: "Research, treatment or diagnosis affecting an individual's genome shall be undertaken only after rigorous and prior assessment of the potential risks and benefits pertaining thereto and in accordance with any other requirement of

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<sup>3</sup> Shorouk News, Start of execution of the Egyptian genome project to diagnose and treat common and incurable diseases, 2 November 2020, [link](#)

<sup>4</sup> Al Wafd, NAMRU, the Pentagon's unit to kill Egyptians, 27 January 2012, [link](#)

national law.”<sup>5</sup> It is worth noting that there are reports that Israel It seeks to produce a genetic bomb, relying on studies of the genes of its neighbors, particularly Egypt.<sup>6</sup> At the same time, Israel is also seeking to claim right to the occupied land of Palestine under the pretext that its people may share genetic characteristics with the peoples of the region<sup>7</sup>.

On October 6, 2020, the Minister of Higher Education and Scientific Research announced the start of the implementation of the Egyptian genome project, with the examination of 100,000 Egyptians within the project<sup>8</sup>.

### *Ministry's role*

On February 2, 2020, the Egyptian Genome Council held its first meeting, declaring a budget of 2 billion Egyptian pounds for the cost of the Egyptian genome project in five years. Minister of Health Hala Zayed's statement at that meeting was clearly in harmony with the ministry's role in commodifying medical statistics services, as: "... she focused on the necessity to provide the necessary support for the project to achieve its goals, confirming the Ministry of Health's support for the program. Zayed promised to provide the ministry with the facilities required to achieve success of the program, adding that this serves the Ministry of Health's plan that launched important national programs in the field of clinical trials."! This proves that the Ministry of Health is making citizens' statistical data available without their consent, or at least without a legal framework in this regard<sup>9</sup>.

## 2- The '100 Million Seha' Initiative

This initiative is a statistical initiative par excellence, as it is based on a comprehensive examination of citizens, by taking blood samples, measuring hemoglobin levels, blood sugar and blood pressure. It also includes measuring height, weight, body mass index and obesity measurement. The initiative

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<sup>5</sup> OHCHR, Universal Declaration on the Human Genome and Human Rights, [link](#)

<sup>6</sup> El Nabaa, Israel produces the first genetic bomb using the DNA of 500,000 Egyptians, 1 December 2012, [link](#)

<sup>7</sup> AFAIP, Egyptian genome: political concerns and necessary legislation, 25 July 2020, [link](#)

<sup>8</sup> Shorouk News, Start of execution of the genome project by examining 100,000 Egyptians, 6 October 2020, [link](#)

<sup>9</sup> Shorouk News, Start of execution of the Egyptian genome project to diagnose and treat common and incurable diseases, 2 November 2020, [link](#)

works statistically on age groups (school students, the elderly, ...) or specific groups (women, ...) or disease groups (virus C, nephropathy, chronic diseases, ...)<sup>10</sup>

## Second: Health Ministry's role in commercialization of experimental medicine services: (clinical trials)

In March 2020, the Ministry of Health announced participation in clinical trials conducted by the World Health Organization.<sup>11</sup> The Ministry announced that 170 citizens had participated in these trials<sup>12</sup>. In July, the Ministry announced that Egypt would welcome participation in clinical trials of the Chinese vaccine for the Coronavirus<sup>13</sup>. These steps raised many questions about the nature of these trials, the safety of the vaccine, and how far it is scientifically reliable<sup>14</sup>.

### Ministry's role

The international pharmaceutical companies seek clinical trials that may be the least expensive, the most diversified, with countries willing to accept them, being primarily commercial establishments seeking profit.

Many international pharmaceutical companies have chosen Egypt to conduct clinical trials for many reasons, including the high population density and the low cost of these trials in Egypt<sup>15</sup>.

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<sup>10</sup> '100 Million Seha' website, [link](#)

<sup>11</sup> Masrawy, WHO: Egypt approves clinical trials for COVID-19 drugs, 30 March 2021, [link](#)

<sup>12</sup> Mubasher News, Health Ministry: 170 cases in Egypt participated in Covid 19- related clinical trials of Corona treatments, 14 October 2020, [link](#)

<sup>13</sup> Al Balad, Chinese Ambassador Announces New Cooperation in the Face of Covid 19, 20 July 2020, [link](#)

<sup>14</sup> El Balad News, According to controls .. Health Ministry: Egypt will participate in the clinical trials on the Chinese vaccine, [link](#)

<sup>15</sup> Shorouk News, Exploitation of Egyptian patients by some pharmaceutical companies, 22 March 2018, [link](#)

May 26, 2021

Instead of protecting citizens, the Egyptian Ministry of Health facilitates these trials and expands their management and supervision. It even offers conducting these trials to some countries voluntarily as a way of diplomatic courtesy between the ruling regimes<sup>16</sup>.

The strange thing is that the Ministry does not dominate the controls of these trials, as the law regulating clinical trials, which was finally approved by Parliament, removed the monitoring mechanism from the Ministry of Health for the benefit of both the Supreme Council for Medical and Clinical Research and the Egyptian Drug Authority, which raises many question about the whole matter.

### Third: Health Ministry's role in commodifying human health services: (the plasma project)

The Ministry of Health's investment trend extended to a dangerous stage, i.e. the commodification of voluntary humanitarian services with a health dimension, in light of the acceleration of implementation of the national project to collect and manufacture plasma derivatives, to enter a dismal phase of commodifying the Egyptian human himself. After turning the nation to a hub for clinical trials, medical statistics, and a spot for testing vaccines in favor of international companies, the Egyptian human has finally been dealt with the logic of "spare parts"!

#### The plasma project

The government's interest and addressing of the plasma project started in 2016, against the backdrop of the dollar crisis and the provision of a local alternative that may provide blood derivatives, and the trend to establish a factory for plasma derivatives<sup>17</sup>.

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<sup>16</sup> Al Masry Al Youm, Health Minister: Conducting Covid 19- related clinical trials of the Chinese vaccine on 40,000 people, without side effects, 28 September 2020, [link](#)

<sup>17</sup> Akhbar el-Yom, The Minister of Health inspects the plasma collection vehicles in preparation for establishing a blood derivatives factory, 30 August 2016, [link](#)

The project passed through several stages, until it reached its pure investment terminal:

### First stage: The plasma project as a ministerial step to save hard currency

Minister of Health Ahmed Emad stated that Egypt had started manufacturing plasma as an alternative to import, within the framework of providing local alternatives in light of the 2016 dollar crisis, after which Resolution No. 610 of 2016 was issued approving the Egyptian code on the Methods of Plasma Collection and Manufacture of Blood Derivatives, which adopted the WHO Code in this regard<sup>18</sup>.

### Second stage: The plasma project as the state's strategic project:

In May 2017, the plasma derivatives project was discussed on the sidelines of the joint Egyptian-Bahraini Business Council meetings, where the two sides discussed establishment of an Egyptian project in the field of plasma derivatives<sup>19</sup>. In January 2018, Minister of Health Ahmed Emad announced the inauguration of the first blood derivatives factory in the history of Egypt, at a cost of 6 billion Egyptian pounds. This announcement indicated that Egypt has a source of crude plasma, which is considered a national wealth (in reference to the population density), and this is the first clear shift towards commodifying that project!

- In November 2018, Minister of Health Hala Zayed announced a comprehensive development plan for blood centers in the governorates to collect plasma and manufacture it locally. Nihad Massad, head of the Blood Bank, stated that the blood transfusion centers collect about 700,000 blood bags annually that are separated into plasma and platelet derivatives<sup>20</sup>.

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<sup>18</sup> The code was published in the Egyptian Gazette, Issue No. 215 of 2016, 25 September 2016

<sup>19</sup> Albilad Press, Comments on an Egyptian-Bahraini project for plasma derivatives on the sidelines of the Joint Business Council meetings, 17 May 2017, [link](#)

<sup>20</sup> Al Watan, Egypt is strongly moving to produce plasma locally ... and a comprehensive plan to provide blood products, 7 November 2018, [link](#)

### Third stage: international cooperation in strategic plasma project

In December 2018, Hala Zayed spoke about a French grant to equip 15 plasma collection centers within the project for manufacturing plasma derivatives<sup>21</sup>. At the beginning of 2019, there was renewed talk about Sisi's directive that the project of manufacturing plasma derivatives should be completed as a strategic project to combat diseases<sup>22</sup>. In April 2019, after a meeting between Sisi and Macron, it was announced that a partnership agreement was signed with the largest French company in the field of plasma manufacturing, to establish the first factory in Africa and the Middle East for the manufacture of plasma derivatives.<sup>23</sup> In September 2019, a French delegation visited the National Blood Transfusion Center to provide support for the project of self-sufficiency of plasma derivative<sup>24</sup>. In January 2020, there was talk about a partnership to manufacture plasma with South Korea<sup>25</sup>. In February 2020, it was announced that a memorandum of understanding was signed between Egypt's Acdim Pharma and South Korea's SK Plasma to establish a factory for plasma derivatives in Egypt!

### Fourth stage: The plasma project as a national project

In February 2020, the Egyptian Prime Minister reiterated the fact that the plasma derivatives project is "a national project" and that he would make every effort to launch the national project for achievement of self-sufficiency in plasma derivatives! After converting the whole thing to a national project, the project turned into a national commercial investment project, as it included the following:

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<sup>21</sup> Masrawy, The Minister of Health: 15 centers for the collection of "plasma derivatives" with a French grant, 11 December 2018, [link](#)

<sup>22</sup> Mibtada, After the president's order, what are the blood plasma derivatives and their role in treating deadly diseases?, 1 February 2019, [link](#)

<sup>23</sup> Albawaba News, The Ministry of Health is seeking foreign expertise to establish the project to collect and manufacture plasma derivatives, 1 February 2019, [link](#)

<sup>24</sup> Shorouq News, A French delegation inspects the National Blood Transfusion Center to provide the necessary support for the project, 12 September 2019, [link](#)

<sup>25</sup> Al Ahram Gate, Minister of Health: Establishment of the first factory for plasma derivatives, 24 January 2020, [link](#)

May 26, 2021

- 1- The Prime Minister's statement on the National Plasma Project for the first time included externally manufacturing of plasma, through exporting blood abroad and obtaining derivatives thereafter.
- 2- In July 2020, the head of the AUPP, the director of the (Military) International Medical Center and the director of the Armed Forces' Medical Services Department all attended a meeting held by Sisi to discuss the national plasma project with the Prime Minister and the Minister of Health<sup>26</sup>.
- 3- In July 2020, it was announced that the Sovereign Fund would be included in this project, where the Prime Minister spoke frankly about the fact that "the large population density in Egypt ensures that such industry would be promising, where we can produce large quantities of plasma",<sup>27</sup> where there were explicit talk about exporting the plasma products<sup>28</sup>. In October, Awad Tag el-Din, Sisi's health advisor, spoke about the idea of exporting plasma<sup>29</sup>. Mahfouz Ramzy, head of the Chamber of Commerce's drug industry committee, said that manufacturing and exporting plasma derivatives would generate billions of dollars for Egypt<sup>30</sup>.

#### Fifth stage: the law on plasma derivatives:

In December 2020, the parliament concluded discussion of the draft law on blood and plasma transfusion, which included arrangements and procedures close to legalization of a certain trade, as the law allows plasma factories to dispose of plasma derivatives for sale or export; and the draft law also provides for the right of the donor to receive money in return for his donation! The law also allows blood collection centers to dispose of blood collected for local factories or for export.

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<sup>26</sup> Shorouq News, Sisi orders establishment of the national project for plasma derivatives, based on the highest international standards, 13 July 2020, [link](#)

<sup>27</sup> Youm7, PM: Sisi adopts the issue of the collection and manufacture of plasma derivatives, 5 July 2020, [link](#)

<sup>28</sup> Mubasher News, PM: The sovereign fund is partnering with a global operator in the plasma derivatives project, 5 July 2020, [link](#)

<sup>29</sup> Al Watan, Awad Tag El-Din: After achieving self-sufficiency, the plasma will be manufactured and exported, 4 October 2020, [link](#)

<sup>30</sup> Akhbar El-Yom, Pharmacists: Manufacturing blood plasma products will generate billions of dollars for Egypt, 21 November 2020, [link](#)

May 26, 2021

According to these five stages, the plasma project was transformed from a project that would achieve self-sufficiency and provide hard currency, to a national investment project that considers the population density as a profit-making opportunity, supervised by the Ministry of Health in partnership with the Egyptian Drug Authority.

## Conclusion

Reviewing the new roles of the Egyptian Ministry of Health, we conclude that it has been transformed into something like “a subcontractor” or “marketing and infrastructure companies”, where the ministry has largely abandoned its traditional function. The question that arises here is: Is such a role worthy of a ministry responsible for the lives of Egyptian citizens or rather a trade company within an investment alliance that has controlled the state with all its capabilities, wealth and citizens, where the main objective of the Ministry of Health has become to make money through people's flesh and blood?!