



The General Manager
Adjudication Branch
Australian Competition & Consumer Commission
P.O. Box 1199
Dickson
ACT. 2602.

A.C.N. 006 040 964
Suite 2 / 47 Railway Road,
Blackburn, Victoria 3130.
Telephone 03 9877 2533
Facsimile 03 9878 6117
PO Box 399, Blackburn,
Victoria 3130

Tuesday, December 18, 2001

Dear Mr Grimwade,

On behalf of Belmore Nurses Bureau, I wish to formally oppose the proposed grant of interim authorisation by Health Purchasing Victoria (HPV) to proceed with the tender process prior to the Australian Competition and Consumer Commission (ACCC) issuing its final determination.

In support of my objection I wish to highlight that the degree of urgency in granting interim authorisation is highly questionable. HPV have noted themselves that the high use of agency nurses has been apparent for a substantial length of time. As a result of this, it is difficult assess how HPV would need interim authorisation as a matter of urgency.

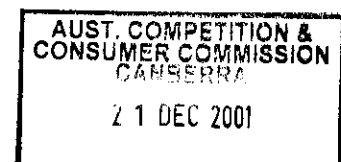
Further to this, the acquisition of interim authorisation will irreversibly damage and be detrimental to the nursing agency industry, which have been operational since 1957. Detriment to the agency industry will occur as agency nurses will perceive that they will be required to change nursing agencies to continue working at their desired health care facilities. Large amounts of nurses leaving particular agencies, in favour of others, will result in the closure of many nursing agencies.

HPV have given no substantiated reasoning as to why the market will not be adversely affected, nor, as to the urgency of their application. On this basis and the reasoning outlined above the ACCC should deny HPV interim authorisation.

Your Sincerely,

for

Maria Bottaro (Hoey)
Belmore Nurses Bureau.



apna

Belmore Nurses Bureau is a member of the Association of Professional Nurses Agents Incorporated.

