

Mr Scott Gregson  
General Manager  
Adjudication Branch, ACCC  
GPO Box 520J  
Melbourne VIC 3001



Dear Mr Gregson

**Submission re Application for revocation and substitution (A90986 & A90989) lodged by Investment and Financial Services Association (IFSA)**

~~On behalf of the Breast Cancer Action Group NSW (BCAG NSW), I wish to convey our~~ support for the continuation of the clauses which protect our members from genetic testing requirements by the life insurance industry, and from any inducements such as offering lower premiums to do so. BCAG NSW has provided a voice for women affected by our disease in this state since 1997.

We firmly believe that all Australians should be offered life insurance at the same rates and without invasion of the privacy of their health information, let alone requirements that they either undertake genetic testing or provide information on any testing they may have voluntarily undergone. We would see this as unethical and unfair to our members and to other Australians who may face similar situations.

We recommend that the Australian life insurance industry continue its business as if these tests were not in existence. Population risk is already understood by actuaries and it would be unethical to alter this by discriminating against those who may, or may be suspected of, having genetic risk for a particular disease (itself an uncertain risk estimate). An undesirable side effect would be that people would be less willing to seek genetic testing, which could adversely influence the monitoring and care of their children and other close relatives. Some of our members see such steps as the beginning of eugenics.

The Breast Cancer Action Group NSW supports the continuation of the protective clauses for five years. We also seek the inclusion of a representative health consumer on the governing body of the Human Genetics Commission of Australia (in line with government's Principles for Appointment of Consumer Representatives: a Process for Governments and Industry), on its relevant committees, working parties etc.

Thankyou for the opportunity to make a submission.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Sally Crossing AM".

SALLY CROSSING AM  
Chair  
24 October 2005