

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 Cancer Voices NSW (CVN), 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 by offering lower premiums to do so. CVN provides a voice for the 33,000 people diagnosed with cancer in NSW each year, and the many more who live with our disease.

We 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 a quite unfair to our members who may have sought genetic testing for breast, ovarian, bowel and some other cancers, as well as to other Australians who may face similar situations.

We recommend that the Australian life insurance industry continues 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 care of their children and other close relatives.

Cancer Voices 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 for Government and Industry), on its relevant committees, working parties etc.

Thankyou for the opportunity to make a submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sally Crossing'.

SALLY CROSSING AM
Chair
25 October 2005

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