



**Australian  
Privacy  
Foundation**

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2 March 2006

Mr Scott Gregson  
General Manager  
Adjudication Branch  
Australian Competition and Consumer Commission  
VIA EMAIL

**Re: Re-authorisation of the Genetic Testing Policy of the Investment  
and Financial Services Association Ltd (IFSA)**

Dear Mr Gregson,

The Australian Privacy Foundation supports the proposed re-authorisation of Clauses 10.1 and 10.3 in the Genetic Testing Policy of the Investment and Financial Services Association Ltd (IFSA).

We understand the effect of these clauses to be that IFSA members agree that they will not require applicants for life insurance to undergo any genetic testing, and will not induce applicants to undergo such testing by offering individuals insurance at a lower than standard rate in light of favourable genetic test results.

In our view, the public interest in the protection of the privacy of genetic information outweighs the public interest in limiting anti-competitive behaviour within the life insurance industry.

Yours sincerely

Anna Johnston  
Chair, Australian Privacy Foundation

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**About the Australian Privacy Foundation**

The Australian Privacy Foundation is the leading non-governmental organisation dedicated to protecting the privacy rights of Australians. We aim to focus public attention on emerging issues which pose a threat to the freedom and privacy of Australians.

Since 1987 the Australian Privacy Foundation has led the defence of the rights of individuals to control their personal information and to be free of excessive intrusions. We use the Australian Privacy Charter as a benchmark against which laws, regulations and privacy invasive initiatives can be assessed. For further information about us see [www.privacy.org.au](http://www.privacy.org.au)