



Date 24 September 2007

To The General Manager
Adjudication Branch
Australian Competition and Consumer Commission
PO Box 1199
Dickson ACT 2602
adjudication@acc.gov.au

Attn. Danielle Staltari

Re: ACCC draft exclusive dealing notification N93093 lodged by Racing & Wagering Western Australia [RWWA]

Dear colleague,

Thank you for your letter of 30 August 2007, seeking our written submission on ACCC's draft notice.

Suncorp's wholly-owned subsidiary GIO General Limited is a licensed provider of workers compensation in Western Australia and as such has an interest in this matter.

GIO supports the ACCC proposition to revoke the RWWA notification. We especially support the following three points from your proposition.

GIO believe the RWWA can implement compulsory measures to ensure that trainers provide a current Workers Compensation Certificate of Currency without restricting the Insurer providing the cover. This would address their concern for uninsured trainers. Other Industries have implemented measures to ensure that compliance is attained e.g. the building Industry requires a current Workers Compensation Certificate of Currency before contractors are admitted to construction sites.

In the Workers Compensation Industry it is generally acknowledged that healthy competition promotes better claims outcomes leading to reduced premiums. GIO supports a competitive insurance environment that drives improved claims experience for clients leading to reduced premiums. Claims management is a market differentiator in Underwritten and Managed fund environments and Insurers are investing in improvement in their claims management models to attract clients.

Workers Compensation Insurance premiums are rated on a risk basis to ensure that better performing clients are not penalised on their premium by the claims experience of poorer performers. A compulsory uniform policy for all trainers may not encourage better behaviour of poorer performers, and it may in fact lead to deterioration in claims experience for this Industry group as a whole.

I can be contacted on 02 8121 0452 or 0418 368 043 if you require any further clarification.

Yours sincerely,

John McNamara
(Acting) Executive General Manager
Customer Development Workers Compensation

Cc - Chris Cunnington, Executive General Manager Regulatory Affairs