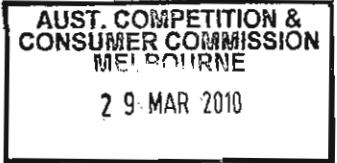


CLAYTON UTZ

Sydney Melbourne Brisbane Perth Canberra Darwin



Dr Richard Chadwick
General Manager, Adjudication Branch
Australian Competition and Consumer
Commission
23 Marcus Clarke Street
CANBERRA ACT 2601

29 March 2010

Our ref 943/14538/80074761

Dear Dr Chadwick

FILE No:	
DOC:	
MARS/PRISM:	

Vision Group Holdings Limited - Application for Authorisation

We act for Vision Group Holdings Limited (**Vision Group**).

We enclose the following documents comprising an application for authorisation under section 88(1A) of the Trade Practices Act 1974 (Cth):

1. A completed Form B (**Application**);
2. A cheque for \$7,500 being the fee for the Application; and
3. Schedule 1: Submission in support of the Application.

Please do not hesitate to call us on the phone numbers below if you have any questions in relation to the Application or supporting submission.

Yours sincerely

Andrew Walker, Partner
+61 3 9286 6943
awalker@claytonutz.com

Nicole Smith, Lawyer
+61 3 9286 6375
nsmith@claytonutz.com

Enclosures

Form B

Commonwealth of Australia

Trade Practices Act 1974 — subsections 88 (1A) and (1)

AGREEMENTS AFFECTING COMPETITION OR INCORPORATING RELATED CARTEL PROVISIONS: APPLICATION FOR AUTHORISATION

To the Australian Competition and Consumer Commission:

Application is hereby made under subsection(s) 88 (1A)/88 (1) of the *Trade Practices Act 1974* for an authorisation:

- to make a contract or arrangement, or arrive at an understanding, a provision of which would be, or might be, a cartel provision within the meaning of Division 1 of Part IV of that Act (other than a provision which would also be, or might also be, an exclusionary provision within the meaning of section 45 of that Act).
- to give effect to a provision of a contract, arrangement or understanding that is, or may be, a cartel provision within the meaning of Division 1 of Part IV of that Act (other than a provision which is also, or may also be, an exclusionary provision within the meaning of section 45 of that Act).
- to make a contract or arrangement, or arrive at an understanding, a provision of which would have the purpose, or would or might have the effect, of substantially lessening competition within the meaning of section 45 of that Act.
- to give effect to a provision of a contract, arrangement or understanding which provision has the purpose, or has or may have the effect, of substantially lessening competition within the meaning of section 45 of that Act.

(Strike out whichever is not applicable)

1. Applicant

- (a) **Name of Applicant:**
(Refer to direction 2)

A91217

Vision Group Holdings Limited (**Vision Group**).

- (b) **Short description of business carried on by applicant:**
(Refer to direction 3)

Vision Group is a private provider of ophthalmic services. Ophthalmologists employed or contracted by Vision Group specialise in corneal, retinal, refractive, and cataract procedures and treat glaucoma and various other debilitating eye conditions.

- (c) **Address in Australia for service of documents on the applicant:**

Andrew Walker
Clayton Utz
Level 18
333 Collins Street
MELBOURNE VIC 3000

2. Contract, arrangement or understanding

- (a) **Description of the contract, arrangement or understanding, whether proposed or actual, for which authorisation is sought:**
(Refer to direction 4)

Please refer to Schedule 1.

- (b) **Description of those provisions of the contract, arrangement or understanding described at 2 (a) that are, or would or might be, cartel provisions, or that do, or would or might, have the effect of substantially lessening competition:**
(Refer to direction 4)

Please refer to Schedule 1.

- (c) **Description of the goods or services to which the contract, arrangement or understanding (whether proposed or actual) relate:**

Ophthalmic services. For further details, please refer to Schedule 1.

- (d) **The term for which authorisation of the contract, arrangement or understanding (whether proposed or actual) is being sought and grounds supporting this period of authorisation:**

Authorisation is being sought for a period of five (5) years.

3. Parties to the proposed arrangement

- (a) **Names, addresses and descriptions of business carried on by other parties or proposed parties to the contract or proposed contract, arrangement or understanding:**

Please refer to Schedule 1.

- (b) **Names, addresses and descriptions of business carried on by parties and other persons on whose behalf this application is made:**
(Refer to direction 5)

Please refer to Schedule 1.

4. Public benefit claims

- (a) **Arguments in support of authorisation:**
(Refer to direction 6)

Please refer to Schedule 1.

- (b) **Facts and evidence relied upon in support of these claims:**

Please refer to Schedule 1.

5. Market definition

Provide a description of the market(s) in which the goods or services described at 2 (c) are supplied or acquired and other affected markets including: significant suppliers and acquirers; substitutes available for the relevant goods or services; any restriction on the supply or acquisition of the relevant goods or services (for example geographic or legal restrictions):

(Refer to direction 7)

While a number of market definitions may be possible, for the purposes of this authorisation, we define the relevant markets as the regional markets for the supply of ophthalmology services to patients in Australia.

6. Public detriments

- (a) Detriments to the public resulting or likely to result from the authorisation, in particular the likely effect of the contract, arrangement or understanding, on the prices of the goods or services described at 2 (c) and the prices of goods or services in other affected markets:**

(Refer to direction 8)

Please refer to Schedule 1.

- (b) Facts and evidence relevant to these detriments:**

Please refer to Schedule 1.

7. Contract, arrangements or understandings in similar terms

This application for authorisation may also be expressed to be made in relation to other contracts, arrangements or understandings or proposed contracts, arrangements or understandings, that are or will be in similar terms to the abovementioned contract, arrangement or understanding.

- (a) Is this application to be so expressed?**

No.

- (b) If so, the following information is to be furnished:**

- (i) description of any variations between the contract, arrangement or understanding for which authorisation is sought and those contracts, arrangements or understandings that are stated to be in similar terms:**

(Refer to direction 9)

Not applicable.

- (ii) Where the parties to the similar term contract(s) are known — names, addresses and descriptions of business carried on by those other parties:**

Not applicable.

- (iii) Where the parties to the similar term contract(s) are not known — description of the class of business carried on by those possible parties:**

Not applicable.

8. **Joint Ventures**

(a) **Does this application deal with a matter relating to a joint venture (See section 4J of the *Trade Practices Act 1974*)?**

No.

(b) **If so, are any other applications being made simultaneously with this application in relation to that joint venture?**

Not applicable.

(c) **If so, by whom or on whose behalf are those other applications being made?**

Not applicable.


9. **Further information**

(a) **Name and address of person authorised by the applicant to provide additional information in relation to this application:**

Andrew Walker
Clayton Utz
Level 18
333 Collins Street
MELBOURNE VIC 3000
Telephone: (03) 9286 6967

Dated..... 29 MARCH 2010.....

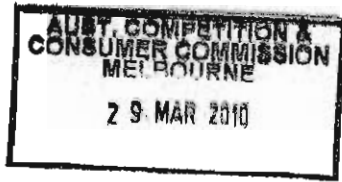
Signed by/on behalf of the applicant

.....
(Signature) 

ANDREW STEPHEN WALKER
Level 18, 333 Collins Street,
Melbourne VIC 3000.....
(Full Name) An Australian Legal Practitioner within the
meaning of the Legal Profession Act 2004

.....
(Organisation)

.....
(Position in Organisation)



DIRECTIONS

1. Use Form A if the contract, arrangement or understanding includes a provision which is, or might be, a cartel provision and which is also, or might also be, an exclusionary provision. Use Form B if the contract, arrangement or understanding includes a provision which is, or might be, a cartel provision or a provision which would have the purpose, or would or might have the effect, of substantially lessening competition. It may be necessary to use both forms for the same contract, arrangement or understanding.

In lodging this form, applicants must include all information, including supporting evidence, that they wish the Commission to take into account in assessing the application for authorisation.

Where there is insufficient space on this form to furnish the required information, the information is to be shown on separate sheets, numbered consecutively and signed by or on behalf of the applicant.

2. Where the application is made by or on behalf of a corporation, the name of the corporation is to be inserted in item 1 (a), not the name of the person signing the application and the application is to be signed by a person authorised by the corporation to do so.
3. Describe that part of the applicant's business relating to the subject matter of the contract, arrangement or understanding in respect of which the application is made.
4. Provide details of the contract, arrangement or understanding (whether proposed or actual) in respect of which the authorisation is sought. Provide details of those provisions of the contract, arrangement or understanding that are, or would or might be, cartel provisions. Provide details of those provisions of the contract, arrangement or understanding that do, or would or might, substantially lessen competition.

In providing these details:

- (a) to the extent that any of the details have been reduced to writing, provide a true copy of the writing; and
 - (b) to the extent that any of the details have not been reduced to writing, provide a full and correct description of the particulars that have not been reduced to writing.
5. Where authorisation is sought on behalf of other parties provide details of each of those parties including names, addresses, descriptions of the business activities engaged in relating to the subject matter of the authorisation, and evidence of the party's consent to authorisation being sought on their behalf.
 6. Provide details of those public benefits claimed to result or to be likely to result from the proposed contract, arrangement or understanding including quantification of those benefits where possible.
 7. Provide details of the market(s) likely to be effected by the contract, arrangement or understanding, in particular having regard to goods or services that may be substitutes for the good or service that is the subject matter of the authorisation.
 8. Provide details of the detriments to the public which may result from the proposed contract, arrangement or understanding including quantification of those detriments where possible.
 9. Where the application is made also in respect of other contracts, arrangements or understandings, which are or will be in similar terms to the contract, arrangement or understanding referred to in item 2, furnish with the application details of the manner in which those contracts, arrangements or understandings vary in their terms from the contract, arrangements or understanding referred to in item 2.

Schedule 1 - Submission in support of the Application

1. Introduction

1.1 Application for Authorisation

This Submission supports the application for authorisation under section 88(1A) of the Trade Practices Act 1974 (Cth) (**Act**) to make and give effect to a provision of a proposed contract, arrangement or understanding which would be, or might be, a cartel provision within Division 1 of Part IV of the Act (**Application**).

The Application and this Submission are made on behalf of and for the benefit of the following parties:

- (a) Vision Group Holdings Limited and its wholly owned subsidiaries (**Vision Group**);
 - (b) All employees engaged by Vision Group to provide ophthalmology services at Vision Group branded clinics during the period of the authorisation; and
 - (c) All contractors engaged by Vision Group to provide ophthalmology services at Vision Group branded clinics during the period of the authorisation,
- (collectively, the **Parties**).

The Parties seek authorisation for a period of five years.

1.2 Proposed conduct

The Parties propose that Vision Group, its employees and the ophthalmologists employed or engaged as consultants at Vision Group clinics during the period of the authorisation may discuss and, if relevant, agree and implement fees to be charged to patients for ophthalmology services supplied at Vision Group branded clinics.

The arrangement would be confined to the fees set for ophthalmology services supplied at Vision Group clinics. Competition between Vision Group clinics and other providers of ophthalmology services will not be affected. Consequently, the Parties consider that there will be minimal, if any, detriment to the public resulting from the proposed conduct and that there will be substantial benefits to the public, as outlined below.

2. Background

2.1 The eye health care industry

Nearly half a million Australians have impaired vision and there are significant costs associated with vision disorders, with an estimated total cost in Australia in 2004 of \$9.85 billion.¹ Ophthalmology is a specialist area of medicine focusing on eye-related diseases, injuries and deficiencies.² Eye health care is a term which encompasses medical and non-

¹ Victorian Department of Human Services, *Victorian ophthalmology service planning framework* (2005), page 1.

² Australian Institute of Health and Welfare, *Eye health labour force in Australia* (August 2009), page 4.

medical services for eye-related diseases, injuries and deficiencies which are provided by the following eye health care professionals³:

- (a) Ophthalmologists, who are specialised medical practitioners trained to provide total eye care. Ophthalmic services may be obtained through private clinics or at select public hospitals. Ophthalmologists perform eye examinations and prescribe lenses, diagnose diseases and disorders of the eye and carry out the medical and surgical procedures necessary for treatment. Ophthalmic surgeons undertake corneal, retinal, refractive and cataract procedures and treat glaucoma and other debilitating eye conditions (collectively referred to hereafter as **ophthalmic services**);
- (b) Ophthalmic nurses, who assist ophthalmologists during surgical procedures and may test vision and perform other eye tests under medical direction;
- (c) Optometrists, who are non-medical practitioners trained to perform eye and vision tests, to prescribe lenses, other optical aids or therapy and, in some states, to prescribe some drugs.⁴ Unlike ophthalmologists, optometrists do not perform surgery. An optometrist who finds a visual complaint that requires medical or surgical treatment will refer the patient to a general practitioner or an ophthalmologist;
- (d) Orthoptists, who specialise in assessing, monitoring and assisting to treat patients with eye and visual system diseases or disorders (such as cataract, glaucoma, macular degeneration and diabetic retinopathy) and to provide the pre-operative measurements for successful surgical outcomes. Orthoptists may prescribe lenses and visual aids in some, but not all, Australian states and territories;
- (e) General practitioners, who may perform eye examination and vision tests to diagnose the presence of eye diseases or disorders; and
- (f) Optical dispensers (also called opticians), who supply spectacles as prescribed by optometrists or ophthalmologists.

2.2 Vision Group

Vision Group was formed in 2001 and is a private provider of ophthalmic services. Vision Group's ophthalmologists specialise in corneal, retinal, refractive and cataract procedures and treat glaucoma and various other debilitating eye conditions.

Vision Group currently operates 23 ophthalmic consulting clinics, 7 laser and refractive eye surgery centres and, separately, 9 day surgeries. While operating as one corporate entity, Vision Group clinics include the following "brands":

- (a) Vision Eye Institute, which provides a range of eye care treatments;
- (b) Vision Retinal Institute, which specialises in retinal conditions;
- (c) Vision Laser, which provides laser eye surgery; and
- (d) Vision Day Surgery, which operates a day surgery for ophthalmic conditions.

³ Australian Institute of Health and Welfare, *Eye health labour force in Australia* (August 2009), page 4; Victorian Department of Human Services, *Victorian ophthalmology service planning framework* (2005), page 20.

⁴ Australian Bureau of Statistics, *ABS Australian Standard Classification of Occupations* (2nd edition).

Vision Group's clinics are owned and operated by Vision Group. Generally, a number of ophthalmologists (who are either employed or contracted by Vision Group) are co-located at each Vision Group clinic. There are three exceptions to this where, in the case of those remote locations, there is only one ophthalmologist at a Vision Group clinic.⁵ At each Vision Group clinic, Vision Group, as the service entity, is responsible for managing and/or maintaining a common reception, common fee collection, common bank account, common trading name, common medical records and common policy and procedures (for example, in areas of risk management, quality and accounting practices).

There are approximately 735 full-time equivalent ophthalmologists working in Australia⁶, of which Vision Group engages approximately 44 ophthalmologists who are "partners" and approximately 10 who are "non-partner" ophthalmologists (associates). Vision Group's partners and non-partner ophthalmologists comprise both employees and independent contractors. Of the 44 "partner" ophthalmologists who work with Vision Group, 29 are employees and 15 are independent contractors.

As well as providing services to Vision Group, a number of Vision Group ophthalmologists:

- (a) provide ophthalmic services to private patients in non-Vision Group clinics; and/or
- (b) work in public hospitals and/or provide public eye screenings.

The Proposed Conduct relates only to services that ophthalmologists provide in or for Vision Group clinics.

3. The conduct in respect of which authorisation is sought

3.1 The Proposed Pricing Arrangements

Vision Group operates its clinics using a team approach. In this regard, each of the Vision Group clinics share patient records, have common facilities, trade under a common trading name of Vision Group and adopt common policies and procedures devised by Vision Group. This team approach allows Vision Group to present the image of a single practice to patients and improves the ease with which patients may consult other ophthalmologists within the same practice if their usual ophthalmologist is unavailable.

As an extension of this team approach, the Parties would now like to discuss and, if relevant, agree and implement fees to be charged to patients for ophthalmology services supplied at Vision Group branded clinics, irrespective of whether the ophthalmologists located at those clinics are engaged by Vision Group as employees or contractors. In this regard, the Parties propose to facilitate the discussion, agreement and implementation of fees charged to patients for ophthalmology services within and between Vision Group clinics. The agreement would be relevant to fees charged by both ophthalmologist employees and ophthalmologist contractors at Vision Group clinics and would relate to:

- (a) intra and inter-practice agreements in respect of the fees to be charged to a particular patient or group of patients. For example, the agreement may be to

⁵ These three locations are Bundaberg, Maryborough and Gladstone in Queensland.

⁶ Australian Institute of Health and Welfare, *Medical labour force 2006: National health labour force series no. 41* (2008). This number is based on data collected in 2006 and is likely to underestimate the number of current ophthalmologists. The number of full-time equivalent ophthalmologists increased by 15% between 2001 and 2006 and this pattern of growth was likely to have continued between 2006 and present: Australian Institute of Health and Welfare, *Eye health labour force in Australia* (August 2009), page vii.

charge lower fees to pensioners. Alternatively, there may be an agreement that one ophthalmologist will refer a particular patient to another ophthalmologist and the second ophthalmologist will see the patient at a lower fee than his or her usual fee; or

- (b) intra and inter-practice agreements to apply consistent pricing either within a practice or between practices (collectively, the **Proposed Conduct**).

The Proposed Conduct is not intended to operate so that discussions, agreements or implementation of fees will be consistent between all Vision Group clinics nationally.

3.2 Period of authorisation sought

The Parties seek authorisation of the Proposed Conduct for a period of five (5) years.

4. Relevant Markets

Vision Group supplies a range of eye health care services to patients, including medical diagnostic and surgical services. While a number of market definitions may be possible, for the purposes of this authorisation, we will define the relevant markets as the regional markets for the supply of ophthalmic services to patients.

5. The Statutory Test for Authorisation

5.1 Section 90 of the Act

Sections 90(6) and (8) of the Act require the Commission to be satisfied before granting authorisation that, in all the circumstances, the proposed conduct is likely to result in benefits to the public and that those benefits are likely to outweigh any public detriment resulting from the proposed conduct.

5.2 The Counterfactual Test

In weighing relevant public benefits and detriments, we understand that the Commission will compare the position which would be likely to exist in the future if the authorisation were granted (**factual**) with the likely position if the authorisation were not granted (**counterfactual**).

The factual scenario in this matter is the implementation of the pricing arrangement. The public benefits which are likely to result from the Proposed Conduct are outlined in detail below.

The counterfactual would involve the contracted ophthalmologists at each Vision Group practice continuing to price their services individually, without the ability to agree on a common fee structure for the services they provide to patients. As outlined below, the significant public benefits present in the factual scenario would not translate to the counterfactual.

6. Public benefits

Vision Group is seeking authorisation on the basis that the public benefit of the Proposed Conduct substantially outweighs any detriment to the public that occurs as a result of the pricing agreement. The public benefits outlined in detail below are:

- (a) improving the quality of ophthalmic care;

- (b) improving the continuity and availability of ophthalmic care for patients;
- (c) improving the certainty and predictability in the price of ophthalmic care;
- (d) improving the responsiveness to patient demands; and
- (e) improving efficiency in administration.

6.1 Improved quality of ophthalmic care

As outlined below, the Proposed Conduct will improve the quality of ophthalmic services offered, which will in turn improve the efficiency and cost effectiveness of such services⁷, by encouraging shared responsibility between ophthalmologists for ensuring that quality of patient care is maintained over time:

- (a) **Shared responsibility for patient outcomes:** The counterfactual, whereby consultant ophthalmologists will continue to set their own fees, creates a situation in which ophthalmologists at Vision Group are uncertain about what they can discuss or agree. Practitioners find it useful to discuss both ophthalmic and practice management issues when seeking to determine ways to improve patient outcomes. Having aspects of the practice which cannot be discussed runs the risk of undermining the culture of open communication that is central to patient safety. Fees are only one element of the team practice but can be difficult to separate from discussions on other important matters. Disallowing discussions and agreements about fees hinders the creation of an optimal team approach to patient care. In contrast, the Proposed Conduct will encourage high standards of patient care as both employees and contractors may consult with Vision Group and each other on all aspects of patient care and are more likely to feel a shared responsibility for patient outcomes.
- (b) **Improved standard of patient care:** If the Proposed Conduct is authorised, the ophthalmologists at Vision Group will no longer compete on price. This is likely to promote cross-referrals and a culture of teamwork within Vision Group clinics which will, in turn, improve the quality of ophthalmic services.⁸ Ophthalmologists are also more likely to view themselves as members of a team where each members has, for example, a shared responsibility for ensuring that the quality of care provided by the team overall is of an appropriate standard. In contrast, competing on fees undermines the general team ethos, as it implies that the ophthalmologists are trying to attract and keep patients away from each other. This is inconsistent with the need for cooperation and trust between team members that facilitates good teamwork.
- (c) **Facilitation of cross-referrals and patient access to sub-specialities:** A knowledge of, and higher consistency in, pricing within and between Vision Group practices would better enable Vision Group to provide patients with access to a broader range of sub-specialists and to provide Vision Group ophthalmologists with

⁷ Commonwealth Department of Health and Aged Care, *The Quality of Australian Health Care: Current Issues and Future Directions* (2000), page 24.

⁸ A number of sources indicate that the quality of health services is improved by working in collaborative team environments, including Commonwealth Department of Health and Aged Care, *The Quality of Australian Health Care: Current Issues and Future Directions* (2000), page 26; National Expert Advisory Group on Safety and Quality in Australian Health Care 1999, *Implementing Safety and Quality Enhancement in Health Care: National Actions to Support Quality and Safety Improvement in Australian Health Care* (1999).

an increased ability to cross-refer patients. Where there is consistency of pricing, there is increased likelihood that patients would be referred to, and be seen by, appropriate sub-specialists as decisions on a treating practitioner would be based on the skill and experience of a particular practitioner rather than cost. Similarly, Vision Group ophthalmologists would be more readily able to cross-refer patients to other Vision Group ophthalmologists if they knew that their patients would not face higher charges if they were so cross-referred. Even where Vision Group ophthalmologists at a clinic (or between clinics) choose not to charge the same fees for a particular procedure after authorisation is granted, the ability to discuss fees and for each Vision Group ophthalmologist to know the fees charged by other ophthalmologists in itself will assist in access to sub-specialists and cross-referral to other Vision Group ophthalmologists. For example, Vision Group ophthalmologists will be able to fully inform their patients of all options open to them for treatment with other ophthalmologists, including the financial ramifications.

- (d) **Increased use of available ophthalmologists:** Following from paragraph (c) above, patients will further benefit from consistent pricing within a Vision Group clinic as they could be seen by the first available ophthalmologist or a more suitable ophthalmologist (such as a sub-specialist) in the practice rather than the "cheapest" ophthalmologist.
- (e) **Increased competition on price and specialisation:** Following on from paragraph (d) above, the ability for patients to see the most suitable ophthalmologist in the clinic, rather than just the cheapest, will in turn encourage ophthalmologists at Vision Group to compete based on quality and specialisations rather than just on price.
- (f) **Team work benefits:** The Proposed Conduct is also likely to improve the job satisfaction of the ophthalmologists working at Vision Group by fostering a culture of teamwork. Good teamwork in health care has been shown to have positive effects, including fewer and shorter delays, increases in morale, job satisfaction and efficiency and use in error management and reduction.⁹

6.2 Continuity and availability of ophthalmic care for patients

The Proposed Conduct will improve the continuity and availability of ophthalmic care. Fee structures that differ, depending on the ophthalmologist seen at Vision Group, inconvenience and confuse patients, interrupt patient care and compromise equitable health outcomes among patients who are disadvantaged either socially, financially, linguistically or culturally.

For example, if a patient needs to see an ophthalmologist and their usual practitioner is not available, the structures in place within Vision Group clinics should enable the patient to be treated by another ophthalmologist, thereby ensuring continuity and availability of ophthalmic care. Such a team approach has a positive impact on patient health outcomes.

However, under the current system where different ophthalmologists at the one clinic may charge different fees for the same service, a patient who can afford one ophthalmologist but not others at the clinic may be forced to wait until the "cheapest" ophthalmologist is available,

⁹ Department of Health and Aged Care, *The Quality of Australian Health Care: Current Issues and Future Directions* (2000); National Expert Advisory Group on Safety and Quality in Australian Health Care, *Implementing Safety and Quality Enhancement in Health Care: National Actions to Support Quality and Safety Improvement in Australian Health Care* (1999); Sexton JB, Thomas EJ, Helmreich RL, "Error, stress and teamwork in medicine and aviation: cross sectional surveys" (2000) 320(7237) *British Medical Journal* 745.

rather than see the first available or most suitable ophthalmologist at the Vision Group clinic. As outlined above in respect of quality of care, even if ophthalmologists within the one clinic choose to continue to set differential fees after the authorisation is granted, the fact that the ophthalmologists would know what each other charges would be of benefit to patients because it would enable an ophthalmologist to discuss with his or her patients all relevant aspects of a potential referral to another ophthalmologist, including the cost to the patient.

6.3 Improving the certainty and predictability in the price of ophthalmic care

There is a clear public benefit in providing patients with consistent and predictable pricing for the services of ophthalmologists operating at Vision Group clinics. The proposed conduct will enable patients to easily identify the costs when consulting any ophthalmologist at a Vision Group clinic. This will increase the ease of access to eye care, particularly if the patient's usual ophthalmologist is not available. For example, patients may more easily identify the costs of consulting other ophthalmologists in the practice, thereby improving the ease with which they can access other ophthalmologists and improving the quality of services the patient receives.

Furthermore, common pricing would be consistent with the public image of Vision Group as one clinic. Ophthalmologists in each Vision Group clinic already work as a team, sharing patient records, common facilities, a common trading name and common policies and procedures. Vision Group clinics appear to patients to be one business. Furthermore, there is no way for patients to tell which individual ophthalmologists are employed by Vision Group (and, therefore, may have common pricing) and which ophthalmologists are consultants (who cannot discuss and agree pricing with employee ophthalmologists and Vision Group and, therefore, whose fees may differ). It would be consistent with the image presented by Vision Group if all ophthalmologists operating at Vision Group clinics may discuss and charge a common price.

Even if there is not common pricing within or between Vision Group clinics, the mere fact that ophthalmologists will be able to discuss pricing, as they discuss all other aspects of ophthalmic care, can benefit patients. For example, an employee ophthalmologist within one Vision Group Clinic may wish to refer one of his or her patients to a sub-specialist at that clinic for a particular treatment. Armed with the knowledge of his or her patient's financial circumstances and the price charged by the ophthalmologist to whom he or she wishes to refer the patient, he or she may be able to advocate a better price for his or her patient.

Furthermore, Vision Group engages a mixture of employee and contractor ophthalmologists because it wishes to improve the availability and quality of ophthalmic care for patients by engaging the most skilled ophthalmologist regardless of whether they prefer to be engaged as an employee or contractor and because this mixture allows longer and more flexible opening hours of clinics, as well as the provision of ophthalmic services in remote locations. The authorisation, if granted, would retain these benefits whilst also ensuring consistency with Vision Group's "single image", as well as the pricing practices currently carried out within other ophthalmic clinics using partnership structures or which engage only employee ophthalmologists.

6.4 Improving the responsiveness to patient demands

Patients generally prefer to see a medical practitioner within the same practice if their usual practitioner is unavailable.¹⁰ This preference is likely to be particularly relevant for patients

¹⁰ Haggerty, JL, Reid RJ, Freeman GK, Starfield BH, Adair CE and McKendry R, "Continuity of care: a multidisciplinary review" (2003) 327(7425) *British Medical Journal* 1219; Pakerton PH, Smith DG, Straley HL, "Primary care practice coordination versus physician continuity" (2004) *Family Medicine* 15.

with chronic or recurring conditions (such as glaucoma). Consistent pricing for the services of ophthalmologists in the one practice improves patients' certainty of pricing and may enable patients who are price sensitive to continue their care at Vision Group in the event that their regular ophthalmologist is not available.

6.5 Improving efficiency in administration

The Proposed Conduct will also benefit the public by improving the efficiency of Vision Group's administrative functions. Agreeing on one price structure, as opposed to pricing services individually, will lead to significant reductions in overheads. Vision Group clinics could pass some of the consequent cost savings on to patients via price reductions or by increasing or improving the range of services available. This would benefit both Vision Group's patients with lower prices and Vision Group clinics by enabling it to compete more effectively on price and/or its range of services.

To illustrate the above, at some of Vision Group's larger clinics (which may engage up to 8 ophthalmologists) administrative staff frequently receive calls from potential patients with queries on price differences between ophthalmologists at the clinic. Given the size of these clinics, a significant amount of administrative staff time needs to be spent on discussing different fees charged by different ophthalmologists within the clinic. Uniform pricing would eliminate this as an issue and free up staff to perform more constructive roles within their clinics.

7. Competition analysis

The Parties believe that there will be minimal, if any, competitive detriment arising from the Proposed Conduct for the reasons outlined below.

7.1 The Proposed Conduct relates only to Vision Group clinics

The Proposed Conduct is confined to a framework agreement on prices to be offered for services performed by ophthalmologists operating in Vision Group clinics. It has no direct relevance to the prices charged by ophthalmologists for services provided outside Vision Group clinics (such as public hospitals) or by numerous other ophthalmic and other eye health care practices which compete with Vision Group clinics.

7.2 The Proposed Conduct is likely to have minimal effect on price

While the Proposed Conduct may limit consumer choice within and between Vision Group practices, patients will have ample choice between Vision Group and a variety of other ophthalmic clinics and, therefore, the Proposed Conduct is likely to have minimal effect on either Vision Group's prices or market prices.

The ophthalmic services markets are highly competitive. Nationally, Vision Group ophthalmologists comprise less than 6% of all ophthalmologists. As outlined in section 2.2 of this Submission, Vision Group employs only a small proportion of the ophthalmologists working in Australia and not all of these ophthalmologists exclusively provide services for Vision Group. Vision Group is subject to strong competition from other ophthalmic providers who offer a similar range of services offered by Vision Group. These providers include the following state-based competitors, as well as a range of individual ophthalmologists:

- (a) In NSW: Laser Sight, Australian Institute of Eye Surgery, Northern Laser Vision Centre, Eyesite Laser, Perfect Vision Laser Correction, Ashfield Eye Clinic, North Shore Eye Surgery, Sydney Vision and Laser Centre, Southern Ophthalmology and South West Vision Institute;

- (b) In Victoria: Laser Sight, Vista Laser Eye Clinic, Cataract Care Centre, South Eastern Eye Surgery, Alpin's Laser, Camberwell Eye Clinic, Berwick Ophthalmology Clinic, Cranbourne Eye Surgery, Essendon Eye Clinic and Laser Centre, New Vision Clinics and Bayside Eye Specialists; and
- (c) In Queensland: Laser Sight, Cairns Eye and Laser Clinic, City Eye Centre, Sunshine Eye Clinic, Queensland Eye Specialists, Queensland Laser Vision, Eye-Tech day surgeries, Brisbane North Eye Care, Gold Coast Eye Clinic and The Eye Care Clinic.

Attachment 1 sets out for each Vision Group clinic competitors in the close vicinity. It can be seen from the tables that in every state there are a number of competitors and in more local areas, with only one exception, there is no Vision Group clinic where there are not a number of competitors within the close vicinity. Therefore, the Proposed Conduct is highly unlikely to result in the increase of fees or to have any anti-competitive detriments.

Furthermore, the ophthalmic services markets are growing, due to the ageing population in Australia and the increase in the number of people with diabetes. Due largely to eye problems being more common amongst the elderly and those with diabetes, the prevalence of eye disease is expected to double by 2020.¹¹ This provides opportunities for additional entrants into the relevant markets and/or expansion by current participants in the relevant markets.

There are a number of public hospitals in Australia that offer ophthalmic services (including 24-hour on call, inpatient, outpatient and emergency consulting and surgery). In Victoria alone, these include the Royal Victorian Eye and Ear Hospital, Western Health, Northern Health, Melbourne Health, Austin Health, Eastern Health, Bayside Health, Southern Health, Peninsula Health, Barwon Health, Ballarat Health Services, Latrobe Regional Hospital and Bendigo Health Care Group.¹² Some visiting surgical services are also available in a range of sub-regional and small rural hospitals.¹³ Furthermore, public hospitals are likely to remain a relevant constraint, with a number of current government initiatives in place to ensure that the public health system increases its capacity so as to be capable of catering for the projected increase in future demand for eye health care services.¹⁴

In addition, Vision Group competes with optometrists and, to some degree, orthoptists in relation to non-surgery eye care (such as diagnosing and treating eye diseases or conditions, such as glaucoma).¹⁵ There are approximately 3,329 optometrists (based on 2006 data) and

¹¹ Victorian Department of Health, *Victorian ophthalmology service planning framework: An overview of recommendations*, page 11; Australian Institute of Health and Welfare, *Eye health labour force in Australia* (August 2009), page 1; Australian Bureau of Statistics, *National Health Survey: Summary of results, 2007-08*, Cat no. 4364.0.

¹² Victorian Department of Human Services, *Victorian ophthalmology service planning framework* (2005), pages 30-34.

¹³ Victorian Department of Human Services, *Victorian ophthalmology service planning framework* (2005), page 32.

¹⁴ See, for example, the initiatives described in Victorian Department of Human Services, *Victorian ophthalmology service planning framework* (2005) and the various Commonwealth, State and Territory initiatives outlined in the Commonwealth Department of Health and Ageing, *Eye Health Progress Report* (August 2008).

¹⁵ See, for example, Victorian Department of Human Services, *Victorian ophthalmology service planning framework* (2005), which on page 48 states: "According to stakeholders, there is a range of areas in which the roles of non-medical staff could potentially be used." These non-medical staff are earlier referred to as including optometrists and orthoptists.

more than 300 orthoptists (based on 2008 data) practising in Australia.¹⁶ It is estimated that optometrists provide over 75 per cent of all vision care services in Australia.¹⁷ The presence of these other specialists will provide an additional constraint on Vision Group in respect of non-surgical eye care.

Finally, in respect of areas where there is a shortage of ophthalmologists and other eye health care professionals (such as some rural and remote areas), practitioners in such areas are likely to be already working to capacity, irrespective of the Proposed Conduct, meaning that they have little incentive or ability to compete to win patients away from their competitors. In such situations of limited competition, the Proposed Conduct is unlikely to have any effect on competition.

7.3 The Proposed Conduct is voluntary

Any potential detriments will be limited by the fact that ophthalmologists contracted by Vision Group will not be compelled to engage in the Proposed Conduct. The pricing arrangements will be entirely voluntary. Ophthalmologists engaged as contractors to Vision Group's clinics may set their own fees, including being free to offer different fees or to offer discounts below Vision Group prices for their services on an individual basis.

8. Statutory test - net public benefit

Under section 90 of the Act, the Commission is required to assess the likely public benefit and detriment, including the effects on competition resulting from the proposed arrangements. The Commission may only grant authorisation if it is satisfied in all the circumstances that the proposed arrangements would result or be likely to result in such a benefit to the public that the proposed arrangement should be permitted.

Given sections 6 and 7 of this Submission, the Parties submit that the detriment to the public will be negligible and that there will be a range of public benefits which result from the conduct. In these circumstances, the Parties consider that the likely benefit will clearly outweigh any detriment and, accordingly, that the Proposed Conduct should be authorised.

¹⁶ Australian Institute of Health and Welfare, *Eye health labour force in Australia* (August 2009), page vii, 22.

¹⁷ Department of Health and Ageing, *Eye health in Australia - section three: The delivery of eye health programs and services*, accessed at <http://www.health.gov.au/internet/main/publishing.nsf/Content/ageing-eyehealth-australia-toc.htm~ageing-eyehealth-australia-s3.htm> in December 2009.

Attachment 1

NEW SOUTH WALES

Clinic Name: Vision Eye Institute and Vision Laser, Level 3, 270 Victoria Avenue, Chatswood

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Chatswood clinic
VG clinic	VEI Cremorne	Suite 101, 357 Military Road	Cremorne	8km
VG clinic	VEI Drummoynes	1 Bayswater Road	Drummoynes	9.5km
VG clinic	VEI Hurstville & VDS Hurstville	8-10 Woniara Road	Hurstville	36 km
VG clinic	VEI Bondi Junction VL Bondi Junction	Level 2, 59-75 Grafton Street	Bondi Junction	16km
Non VG clinic	Dr A Bank & R Lim	303 Pacific Hwy	Lindfield	5km
Non VG clinic	Dr N Banks	56 Chandos St	St Leonards	5km
Non VG clinic	Gordon Eye Centre (comprising 6 ophthalmologists)	802 Pacific Hwy	Gordon	8km
Non VG clinic	Dr M Branley	Westbourne St	St Leonards	5km
Non VG clinic	Chatswood Grove Eye Clinic (comprising 5 ophthalmologists)	12-14 Malvern Ave	Chatswood	0.25km
Non VG clinic	Dr R Ho	22 Thomas St	Chatswood	0.5km
Non VG clinic	Chatswood Retina Service (comprising 2 ophthalmologists)	105 Archer St	Chatswood	0.25km
Non VG clinic	Dr T Micheli	66 Pacific Hwy	St Leonards	5km
Non VG clinic	Dr B O'Donnell	66 Pacific Hwy	St Leonards	5km
Non VG clinic	Dr D Semmonds	66 Pacific Hwy	St Leonards	5km
Non VG clinic	Dr I Singh	16 Malvern Ave	Chatswood	0.25km
Non VG clinic	Dr T J Playfair	12-14 Malvern St	Chatswood	0.5km
Non VG clinic	Dr D Pettinger	4 Vals Court	St Ives	10km
Non VG clinic	Northern Laser Vision Clinic	13 Spring St	Chatswood	0.5km

Clinic Name: Vision Eye Institute, Suite 101, 357 Military Road, Cremorne

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Cremorne clinic
VG clinic	VEI Chatswood & VL Chatswood	Level 3, 270 Victoria Avenue	Chatswood	8km
VG clinic	VEI Drummoyne	1 Bayswater Road	Drummoyne	12.5km
VG clinic	VEI Hurstville & VDS Hurstville	8-10 Woniara Road	Hurstville	30 km
VG clinic	VEI Bondi Junction & VL Bondi Junction	Level 2, 59-75 Grafton Street	Bondi Junction	16km
Non VG clinic	Dr R Binnetter	41 Rickard Rd	North Sydney	5km
Non VG clinic	Dr P Bolliger	37a Noonbinna Cres	Northbridge	3km
Non VG clinic	Dr J Danks & Dr R Rawson	818 Pittwater Rd	Dee Why	15km
Non VG clinic	Dr T Haymet & B Barnes	1A Effingham St	Mosman	1km
Non VG clinic	The Eye Clinic (comprising 2 ophthalmologists)	39 East Esplanade	Manly	5km
Non VG clinic	Dr I Sebban	1A Cross St	Brookvale	10km
Non VG clinic	Dr J Smith	Dee Why Square	Dee Why	15km
Non VG clinic	Dr S Sachdev	763 Pittwater rd	Dee Why	15km
Non VG clinic	Dr A King	731 Pittwater Rd	Dee Why	15km

Clinic Name: Vision Eye Institute, 1 Bayswater Road, Drummoyne

Other clinics or doctors in region	Clinic Name or Doctor Name	Address	Suburb	Approx distance from V&E Drummoyne clinic
VG clinic	VEI Chatswood & VL Chatswood	Level 3, 270 Victoria Avenue	Chatswood	9km
VG clinic	VEI Cremorne	Suite 101, 357 Military Road	Cremorne	13km
VG clinic	VEI Hurstville & VDS Hurstville	8-10 Woniora Road	Hurstville	31 km
VG clinic	VEI Bondi Junction & VL Bondi Junction	Level 2, 59-75 Grafton Street	Bondi Junction	11km
Non VG clinic	Dr R Bengler & S Taylor	250 Victoria Rd	Drummoyne	0.5km
Non VG clinic	Dr J Byrne	Strathfield Plaza	Strathfield	5km
Non VG clinic	Dr G Banerjee	22 Myee Ave	Strathfield	5km
Non VG clinic	Dr G Bhandari	15 Thomas St	Strathfield	5km
Non VG clinic	Dr D Campbell	86 Shaftesbury Rd	Burwood	5km
Non VG clinic	Dr A Chang	3A Redmyre Rd	Strathfield	5km
Non VG clinic	Dr B Den	2 Holden St	Ashfield	10km
Non VG clinic	Dr A Farinelli & K McClellan	2 Smith St	Ryde	5km
Non VG clinic	Dr A Jennings & Dr J Smith	15 Parnell St	Strathfield	5km
Non VG clinic	Dr J Lee, Thiagalingham & B Barnes	12 Railway St	Burwood	5km
Non VG clinic	Dr H Stern	38 Norton St	Leichhardt	5km
Non VG clinic	Dr R Williams & Zborowska	280 Burwood Rd	Burwood	5km
Non VG clinic	Drs A, D & I Wechsler	36 Burwood Rd	Burwood	5km

Clinic Name: Vision Eye Institute and Vision Day Surgery, 8-10 Woniara Road, Hurstville

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Hurstville clinic
VG clinic	VEI Chatswood & VL Chatswood	Level 3, 270 Victoria Avenue	Chatswood	36km
VG clinic	VEI Cremorne	Suite 101, 357 Military Road	Cremorne	30km
VG clinic	VEI Drummoyne	1 Bayswater Road	Drummoyne	31km
VG clinic	VEI Bondi Junction & VL Bondi Junction	Level 2, 59-75 Grafton Street	Bondi Junction	25km
Non VG clinic	Southern Ophthalmology	4 Belgrave St	Kogarah	5km
Non VG clinic	Visionary Eye Specialists	The Avenue	Hurstville	2km
Non VG clinic	Visionary Eye Specialists	Gibbs St	Miranda	10km
Non VG clinic	Miranda Eye Surgical Center	Willcox Ave	Miranda	10km
Non VG clinic	Campsie Eye Specialists	Claremont St	Campsie	9km
Non VG clinic	Dr Peter Cohen	Gibbs St	Miranda	10km
Non VG clinic	Dr John Downie	MacMahon St	Hurstville	1km
Non VG clinic	Dr Alan Rosenberg	President Ave	Caringbah	12km
Non VG clinic	Dr Richard Wingate	Urunga Pde	Miranda	10km

Clinic Name: Vision Eye Institute and Vision Laser, Level 2, 59-75 Grafton Street, Bondi Junction

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Bondi Junction clinic
VG clinic	VEI Chatswood & VL Chatswood	Level 3, 270 Victoria Avenue	Chatswood	16km
VG clinic	VEI Cremorne	Suite 101, 357 Military Road	Cremorne	11km
VG clinic	VEI Drummoyne	1 Bayswater Road	Drummoyne	11km
VG clinic	VEI Hurstville & VDS Hurstville	8-10 Woniara Road	Hurstville	25 km
Non VG clinic	Perfect Vision/Laser Sight	Various locations including CBD	Sydney	6km
Non VG clinic	PersonalEyes	Various locations including CBD	Sydney	6km
Non VG clinic	Sebban Eye Centre	Cross St	Brookvale	21km
Non VG clinic	Sydney Laser & Vision Center	Harley Place Oxford St	Bondi Junction	2km
Non VG clinic	Elder Eye Clinic	Grosvenor St	Bondi Junction	2km
Non VG clinic	Dr Michael Hennessy	Newland St	Bondi Junction	2km
Non VG clinic	Dr T J Playfair	251 Oxford St	Bondi Junction	1km
Non VG clinic	Dr Peter Martin	Harley Place Oxford St	Bondi Junction	2km

QUEENSLAND

Clinic Name: Vision Eye Institute, Suite 14, Woolcock Street, Townsville and North Queensland Day Surgical Centre and Vision Laser, 119 Kings Road, Pimlico

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Townsville clinic
VG clinic				
Non VG clinic	Dr M Moon	7 Bayswater Rd.	Hyde Park	1km
Non VG clinic	Dr G Kelly	132 Ross River Rd	Mundingburra	2km
Non VG clinic	Dr B Talbot & Dr J Bowbyes	14 Fulham Rd	Pimlico	1.5km

Clinic Name: Vision Retinal Institute, Vision Eye Institute, Vision Laser and Short Street Day Surgery, Level 4, 2 Short Street, Southport

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VRI Southport clinic
VG clinic	VEI Coolangatta & VRI Coolangatta	Level 1, 72-80 Marine Parade	Coolangatta	27km
VG clinic	VEI Varsity Lakes & VRI Varsity Lakes	Lot 1201 Lake Orr Drive	Varsity Lakes	16.5km
Non VG clinic	Dr John Kearney	94 Nerang Street	Southport	2kms
Non VG clinic	Dr Peter Montgomery	94 Nerang Street	Southport	2kms
Non VG clinic	Dr Gary Phelps	27/1-7 Swan Lane	Southport	2kms
Non VG clinic	Dr Andre Theron	95 Nerang Street	Southport	2kms
Non VG clinic	Dr Roger Welch	91-95 Nerang Street	Southport	2kms

Clinic Name: Vision Eye Institute and Vision Retinal Institute, Level 1, 72-80 Marine Parade, Coolangatta

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VRI Coolangatta clinic
VG clinic	Southport	Level 4, 2 Short Street	Southport	27km
VG clinic	VEI Varsity Lakes & VRI Varsity Lakes	Lot 1201 Lake Orr Drive	Varsity Lakes	20km
Non VG clinic	Dr Petar Novakovic	6 Scott Street	Coolangatta	0.5km
Non VG clinic	Dr Emanuel Svoboda	6 Scott Street	Coolangatta	0.5km

Clinic Name: Vision Eye Institute and Vision Retinal Institute, Lot 1201 Lake Orr Drive, Varsity Lakes

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Varsity Lakes clinic
VG clinic	Southport	Level 4, 2 Short Street	Southport	16.5km
VG clinic	VEI Coolangatta & VRI Coolangatta	Level 1, 72-80 Marine Parade	Coolangatta	20km
Non VG clinic	Dr Petar Novakovic	6 Scott Street,	Coolangatta	15km
Non VG clinic	Dr Emanuel Svoboda	6 Scott Street,	Coolangatta	15km
Non VG clinic	Dr John Kearney	94 Nerang Street	Southport	15km
Non VG clinic	Dr Peter Montgomery	94 Nerang Street	Southport	15km
Non VG clinic	Dr Gary Phelps	27/1-7 Swan Lane	Southport	15km
Non VG clinic	Dr Andre Theron	95 Nerang Street	Southport	15km
Non VG clinic	Dr Roger Welch	91-95 Nerang Street	Southport	15km

Clinic Name: Vision Eye Institute and Mackay Day Surgery, 85-91 Willetts Road, North Mackay

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI North Mackay clinic
VG clinic				
Non VG clinic	Dr Chris Hornsby	Suite 15, Mater Medical Centre, 76 Willetts Road	North Mackay Qld 4740	0.5km
Non VG clinic	Dr Rod Kirkwood	103 Alfred Street	Mackay Qld 4740	8km

Clinic Name: Vision Eye Institute, 9/15 Central Plaza Central Ave, Hervey Bay

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Hervey Bay clinic
VG clinic	VEI Maryborough	St Stephens Medical Centre level 1/166 John St	Maryborough	35km
Non VG clinic	Mary River Eye Hervey Bay	Cnr Boat Harbour Dye O'reagan St	Hervey Bay	1km
Non VG clinic	Eyes Wide Bay	Urangan Shopping Centre	Hervey Bay	8km
Non VG clinic	Fraser Coast Eye Specialist	St Stephens Medical Centre Level 1/166 John Street	Maryborough	Same building
Non VG clinic	Mary River Eye Maryborough	Ellena Street Maryborough	Maryborough	5km

Clinic Name: Vision Eye Institute, 166 John Street, Maryborough

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Maryborough clinic
VG clinic	VEI Hervey Bay	Shop 9/15 Central Ave	Hervey Bay	35km
Non VG clinic	Mary River Eye Hervey Bay	Cnr Boat Harbour Dye O'reagan St	Hervey Bay	1km
Non VG clinic	Eyes Wide Bay	Urangan Shopping Centre	Hervey Bay	8km
Non VG clinic	Fraser Coast Eye Specialist	St Stephens Medical Centre Level 1/166 John Street	Maryborough	Same building
Non VG clinic	Mary River Eye Maryborough	Ellena Street Maryborough	Maryborough	5km

Clinic Name: Vision Eye Institute, 31 Kirkellen Street, North Rockhampton

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI North Rockhampton clinic
VG clinic				
Non VG clinic	CQ Eye	212 Quay Street	Rockhampton	4km
Non VG clinic	Dr Anil Sharma	Ward Street	South Rockhampton	8km

Clinic Name: Vision Eye Institute, 39 Branyan Street, Bundaberg

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Bundaberg clinic
VG clinic				
Non VG clinic	Queensland Eye Specialists	21 Walker Street	South Bundaberg	5km

Clinic Name: Vision Eye Institute, Medical Suite 1, Rosella Street, Gladstone

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Gladstone clinic
VG clinic				
Non VG clinic		No other ophthalmologists in Gladstone		

Clinic Name: Vision Eye Institute, Vision Retinal Institute, Vision Day Surgery and Vision Laser, Level 2, 401 Milton Road, River City

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI River City clinic
VG clinic	VEI Mt Gravatt		Mt Gravatt	28km
Non VG clinic	Dr D Conrad	30 Chaseley St	Auchenflower	0.5km
Non VG clinic	Dr T Forster	40 Chaseley St	Auchenflower	0.5km
Non VG clinic	Eyetech	33 North St	Spring Hill	3.5km
Non VG clinic	Laser Sight	35 Astor Tce	Spring Hill	4km
Non VG clinic	Terrace Eye Centre	135 Wickham Tce	Spring Hill	4km
Non VG clinic	City Eye Centre	135 Wickham Tce	Spring Hill	4km
Non VG clinic	Brisbane Eye Clinic	135 Wickham Tce	Spring Hill	4km

There are also 5 other practices at Spring Hill

Clinic Name: Mt Gravatt

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from Mt Gravatt clinic
VG clinic	VEI River City	Level 2, 401 Milton Road	River City	28km
Non VG clinic	Eyeteck	22 Sanders St	Upper Mt Gravatt	0.5km
Non VG clinic	Porter Eye Care	8 Mountain St	Mt Gravatt	3km
Non VG clinic	Dr Mark Del Pra	1965 Logan Rd	Upper Mt Gravatt	0.2km
Non VG clinic	Dr Mark McGree	259 McCullough St	Sunnybank	5km
Non VG clinic	Queensland Eye Institute	41 Annerley Rd	Sth Brisbane	9km
Non VG clinic	Dr Russell Bach	Greenslopes Private Hospital	Greenslopes	7km
Non VG clinic	Dr John Dyer	Greenslopes Private Hospital	Greenslopes	7km

VICTORIA

Clinic Name: Vision Eye Institute and Vision Day Surgery, 27 Denmark Hill Road, Camberwell

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Camberwell clinic
VG clinic	VRI Eastern & VDS Eastern	852 Whithorse Rd	Box Hill	8km
VG clinic	VCI St Kilda Rd & VL St Kilda Rd	600 St Kilda Rd	Mebourne	9.5km
VG clinic	VEI Blackburn South	156 Canterbury Rd	Blackburn South	10km
Non VG clinic	Ashburton Eye Clinic	327 High St	Ashburton	5km
Non VG clinic	Eye Surgery Associates	Suite 52, Cabrini Medical Centre, Isabella St	Malvern	6km
Non VG clinic	Dr Joanne Dondey	258 Warrigal Rd	Glen Iris	5km
Non VG clinic	Dr Kevin Foo	88 High St	Kew	5.5km
Non VG clinic	Hawthorn Eye Clinic	829 Glenferrie Rd	Kew	5km
Non VG clinic	Dr Rodger Davies	585 Glenferrie Rd	Hawthorn	2.5km
Non VG clinic	Dr David Ehrlich	459 Station St	Box Hill	7.5km

Clinic Name: Vision Eye Institute, 97 Bell Street, Coburg

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Coburg clinic
VG clinic	VCI St Kilda Rd & VL St Kilda Rd	600 St Kilda Road	Melbourne	13km
VG clinic	VEI Footscray & VDS Footscray	89 Paisley Street	Footscray	13km
Non VG clinic	Royal Victorian Eye and Ear Hospital	32 Gisborne St	East Melbourne	8km
Non VG clinic	Laser Sight Melbourne	2/100 Victorian Pde	Melbourne East	8km
Non VG clinic	Preston Eye Clinic	268 Murray Rd	Preston	4km
Non VG clinic	Eye Clinic	88 Maribyrnong Rd	Moonee Ponds	8km
Non VG clinic	Essendon Eye Clinic and Laser Centre	154 Buckley St	Essendon	6.5km
Non VG clinic	Cataract Care Centre	267 Moreland Road	Coburg	2.5 km
Non VG clinic	Dr A.M.V. Brooks	394 Albert St	East Melbourne	9.5km

Clinic Name: Vision Eye Institute and Vision Day Surgery, 89 Paisley Street, Footscray

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Footscray clinic
VG clinic	VCI St Kilda Rd & VL St Kilda Rd	600 St Kilda Rd	Melbourne	11km
VG clinic	VEI Coburg	97 Bell St	Coburg	13km
Non VG clinic	Royal Victorian Eye and Ear Hospital	32 Gisborne St	East Melbourne	8km
Non VG clinic	Laser Sight Melbourne	2/100 Victorian Pde	Melbourne East	7.5 km
Non VG clinic	Melbourne Retina Associates	59 Victoria Pde	Fitzroy	8km
Non VG clinic	Eye Clinic	88 Maribyrnong Rd	Moonee Ponds	5km
Non VG clinic	Dr A.M.V. Brooks	394 Albert St	East Melbourne	8km
Non VG clinic	Western Eye Clinic - Western Hospital	Gordon St	Footscray	1.5 km
Non VG clinic	Western Eye Specialists	34 Eleanor St	Footscray	2km

Clinic Name: Vision Eye Institute, 156 Canterbury Road, Blackburn South

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VEI Blackburn South clinic
VG clinic	VRI Eastern & VDS Eastern	852 Whithorse Rd	Box Hill	5km
VG clinic	VEI Camberwell & VDS Camberwell	27 Denmark Hill Rd	Hawthorn East	10km
Non VG clinic	Waverley Eye Clinic	226 Springvale Road	Glen Waverley	8km
Non VG clinic	Dr Peter Chau	688 Whitehorse Rd	Mont Albert	7km
Non VG clinic	Ringwood Eye Clinic	18 Warrendyte Rd	Ringwood	9km
Non VG clinic	North Balwyn Eye Clinic and Laser Center	Cnr Doncaster Rd & Elisa St	Balwyn North	10km
Non VG clinic	Dr Vinithra Kuma	230 Mountain Hwy	Wantirna	7.5km
Non VG clinic	Dr David Ehrlich	459 Station St	Box Hill	4km
Non VG clinic	Dr Joanne Dondey	258 Warrigal Road	Glen Iris	8km

Clinic Name: Vision Cataract Institute and Vision Laser, Ground Floor, 600 St Kilda Road, St Kilda

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VL St Kilda clinic
VG clinic	VEI Camberwell & VDS Camberwell	27 Denmark Hill Rd	Hawthorn East	9km
VG clinic	VEI Footscray & VDS Footscray	89 Paisley St	Footscray	11km
Non VG clinic	Meddownick Laser Clinic	185 Hoddle St	Richmond	4km
Non VG clinic	Laser Sight Melbourne	2/100 Victorian Pde	Melbourne East	5.5km
Non VG clinic	New Vision Clinics	160 Victorian Pde	Melbourne East	5.5km
Non VG clinic	Caufield Eye Clinic and Laser Centre	961 Glenhuntly Rd	Caufield	7.5km
Non VG clinic	Vista Laser Eye Clinic	1 Ross Street	Elsternwick	5km

Clinic Name: Vision Retinal Institute and Vision Day Surgery, Level 1, 852 Whitehorse Road, Eastern

Other clinics or doctors in region	Clinic Name or Doctor name	Address	Suburb	Approx distance from VRI Eastern clinic
VG clinic	VEI Blackburn South	156 Canterbury Rd	Blackburn South	5km
VG clinic	VEI Coburg	97 Bell St	Coburg	8km
VG clinic	VEI Camberwell & VDS Camberwell	27 Denmark Hill Rd	Hawthorn East	8km
Non VG clinic	The Doncaster Eye Centre	184 High St	Doncaster	6.5km
Non VG clinic	North Balwyn Eye Clinic and Laser Center	Cnr Doncaster Rd & Elisa St	Balwyn North	6km
Non VG clinic	Dr David Ehrlich	459 Station St	Box Hill	1km
Non VG clinic	Hawthorn Eye Clinic	829 Glenferrie Rd	Kew	9km
Non VG clinic	Dr Joanne Dondey	258 Warrigal Road	Glen Iris	6.5km
Non VG clinic	Dr Peter Chau	688 Whitehorse Rd	Mont Albert	2km
Non VG clinic	Dr Kevin Foo	88 High St	Kew	9km