
Australian Institute of Medical Scientists

ABN 12 945 883 573 ACN 010 985 403



Ref:

Ms Marie Dalins
Director
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 520
Melbourne
Vic 3001

11th November 2011

Dear Ms Dalins

Thank you for your letter dated 28 October 2011 concerning the **exclusive dealing notification N95607 lodged by Cabrini Health Limited**, and the opportunity to comment.

Our comments are as follows:

1. The Australian Institute of Medical Scientists (AIMS) is a professional organisation representing some 2000 Medical Scientists from all disciplines of pathology and associated industries. It is involved in establishing and maintaining the high academic and professional standards of medical scientists employed in Australian medical laboratories. The institute also provides medical scientists with the opportunity to continually update their professional knowledge through national and state scientific meetings, a scientific journal and postgraduate programs such as the Fellowship. AIMS has a minimum requirements standards document for degree level courses in medical laboratory science offered by Australian universities and undertakes regular reviews to ensure the courses meet these standards.

AIMS is also the body to which the National Office of Overseas Skills Recognition (NOOSR) has delegated the authority to assess the skills and qualifications of those people who are applying to migrate to Australia under the Commonwealth's General Skilled Migration Program as medical scientists or medical laboratory technical officers. AIMS carries out these assessments on behalf of NOOSR.

The Australian Institute of Medical Scientists (AIMS) is not a customer, competitor or supplier of Cabrini Health. However, as a professional organisation for medical scientists, AIMS will count amongst its members, employees of Cabrini Health. Through its activities in the provision of professional development activities and credentialing, AIMS will have professional interaction with these members from time to time.

2. We believe that the proposal by Cabrini Health for an exclusive dealing arrangement within their health services will have no perceived impact on the employment, training, professional development or career progression of medical scientists within their employ.
3. However, this proposal appears to set a precedent which may enable other vertically integrated hospital, pathology and radiology services effectively to lock out competitors and in so doing it could compromise the recently espoused position on pathology services requesting provisions which have, for the first time, enabled patients to choose their provider. This potentially could impact on provider accountability and transparency that the existing arrangement achieves through market demand.

Sincerely

Meredith Liddy
Chief Executive