

25 January 2013

Dr Richard Chadwick
General Manager
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

Dear Dr Chadwick

Draft determination – Australian Medical Association application for authorisation

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to provide submission in response to the Australian Competition and Consumer Commission's draft determination in relation to the Australian Medical Association (AMA) application for authorisation A91334.

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

As we noted in our earlier submissions regarding this application, CHF recognises the benefits of consistent pricing for services within a GP practice, regardless of its legal structure, and is not opposed, in principle, to the concept of intra-practice price setting by GPs. Our submissions, however, expressed concerns that there would be no benefit to consumers from the limitation of this authorisation to members of the AMA only, as proposed in the original application, or to limitation of the authorisation to practices registered with the AMA, in which at least one of the GPs is a current member of the AMA, as proposed in an amendment to the application. CHF recommended that the authorisation be extended to all GPs working in single practices.

CHF notes that the AMA further amended its application on 5 December 2012, to extend the scope of the authorisation to cover all GPs within defined practice structures. This amendment addresses CHF's concerns with the original and amended applications for authorisation.

CHF therefore supports the ACCC's draft decision to grant authorisation for five years to general practitioners who operate within certain team based practice structures to engage in intra-practice price setting and collective bargaining with VMO Service Purchasers and Medicare Locals.

CHF appreciates the opportunity to provide a submission in response to the Draft Determination. If you would like to discuss these comments in more detail, please contact CHF Deputy Chief Executive Officer, Anna Greenwood.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Carol Bennett', written in a cursive style.

Carol Bennett
CHIEF EXECUTIVE OFFICER