

30 August 2013

David Hatfield
Australian Competition and Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

Dear David,

Ref: TRACKIT-51274

Thank you for discussing the draft determination in regards to the Rural Doctors Associations of Australia application for authorisation A91376.

As I explained in our discussion the Rural Doctors Associations of South Australia RDASA has been involved in industrial negotiations which have led to successful outcomes on two occasions in the last six years.

This initially came into being after the RDASA representatives met with Commissioners from the ACCC to discuss the process and the successful completion of the two rounds of industrial negotiations has led to greater certainty in regards to the provision and continuity of services and doctors working conditions in Country Health SA hospitals.

In 2011 Country Health SA evolved into Country Health SA Local Hospital Network, however any contracts that were done with rural doctors in South Australia still were maintained with Country Health SA but with a name change to Country Health SA Local Hospital Network.

The RDASA are about to embark on another round of industrial negotiations with Country Health SA LHN as we believe that these are important industrial negotiations that continue to provide the certainty of services and provision of services and an adequate doctor workforce for Country Health SA hospitals.

In your draft determination you have stated that the Rural Doctors Association of Australia and its constituent state associations can collectively negotiate with state and territory health departments in regards to the terms of contract for general practitioners or rural generalist practitioners and visiting medical officers in rural areas.

In your draft determination you have also stated that this authorisation does not extend to Medical locals and Local Hospital Networks.

Currently the Country Health SA LHN covers all the rural hospitals in South Australia under one Local Hospital Network.

RDASA believes that it is important that RDASA can still negotiate with Country Health SA LHN as it is the state health department for rural hospitals in our state RDASA recognises that in other states there may be a number of LHN's across different states of Australia.

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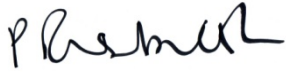
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For this reason RDASA requests that it continue to be allowed to negotiate with the state health department responsible for rural hospitals in South Australia which in fact is the Country Health SA Local Health Network and that this will lead to the continuation of services by the rural doctor workforce in rural South Australia.

Yours sincerely



Dr Peter Rischbieth
Vice President – Industrial
Rural Doctors Association of South Australia