



**RURAL
DOCTORS'
ASSOCIATION OF
WESTERN
AUSTRALIA INC.**

9 September 2013

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

Dear David

Re: Rural Doctors Association of Australia application for authorisation A91376 – draft determination

Under the previous Rural Doctors Association of Australia (RDAA) authorisation (A 91078), the Rural Doctors Association of Western Australian (RDAWA) has previously negotiated with the Western Australia Country Health Service (WACHS) regarding the terms and conditions of Medical Service Agreements (MSAs). These agreements cover rural medical contractors, including local rural general practitioners and temporary replacement medical practitioners.

These negotiations have been undertaken in conjunction with the Australian Medical Association of Western Australia (AMAWA).

The WACHS has now been designated as a Local Hospital Network (LHN), which is recognised by both the State and Commonwealth government as the single entity responsible for delivering health services to regional, rural and remote areas of the State.

Under the draft determination (A91376) issued by the ACCC, the authorisation for RDAA and its constituent state associations to collectively negotiate with state and territory health departments regarding the terms of contracts for general practitioners or rural generalist visiting medical officers in rural areas, does not extend to LHNs.

RDAWA believes that there has been a significant benefit for all parties to these negotiations in Western Australia and that there is a strong need to be able to continue to negotiate on a similar basis as under the previous arrangements with WACHS. In its draft determination, the ACCC has noted that there have been benefits to state-wide negotiations, and little or no public detriment.

RDAWA requests that the draft determination be extended to include negotiations with the WACHS.

I am available to discuss this submission or to provide further information.

Yours sincerely

Dr Mike Eaton
President, RDA WA