



15 June 2021

Darrell Channing
Director Competition Exemptions Branch
Australian Competition & Consumers Commission
23 Marcus Clarke Street
Canberra ACT 2601

By email: exemptions@acc.gov.au

Dear Mr Channing,

AA1000542 – Honeysuckle Health – submission

I write in response to your invitation to provide a submission in response to the Honeysuckle Health draft determination.

AOA states for the record that if this proposal goes ahead, it will change the landscape of healthcare within Australia in an irrevocable and irreparable manner. It will be impossible to unravel after five years.

It will introduce a system of managed care to Australia similar to the USA system and that is a system that does not benefit significant numbers of Americans and will not benefit Australian patients. The overall goal of health care provision in Australia has always been, and must remain, to produce the best outcomes for patients undergoing procedures in the type of facility most suited to the individual patient's particular circumstances.

AOA believes there are a number of unintended consequences and perverse incentives bundled into this proposal; these include:

- The fact that this proposal is a fundamental attack on the universality of the Medicare system;
- The erosion of the primacy of the doctor-patient relationship in healthcare decision-making;
- Discrimination against certain groups of patients, including the elderly, the socially isolated, those for whom English is a second language, rural populations, the chronically unwell and those in the lower socio-economic strata of the general population;
- Certain patients being “orphaned” in the private sector and then forced into an already-overburdened public healthcare system
- An increased burden on the public hospital system which is already under - resourced and increasingly unable to cope with ever-increasing utilisation numbers; and
- It will increase costs of healthcare for patients as the primary goal is to increase dividends for shareholders, rather than provide optimal individualised care for patients.

AOA does not agree with the AA1000542 draft determination and asks -“Who will make this clinical decision?”

President

Michael J Gillespie

Vice-President

Annette C Holian

Second Vice-President

Christopher N Morrey

Chair of Education

and Training

Christos M Kondogiannis

Chair of Professional

Conduct and Standards

Susan M Liew

Scientific Secretary

Richard S Page

State Chair Director

Alison L Taylor

General Director and

Treasurer

Christopher J Vertullo

General Director

Andrew Wines

AORA President

Thomas Clifton

Chief Executive Officer and

Company Secretary

Adrian R Cosenza



Will clinical care be directed by clinicians, or by health fund managers and administrators?

AOA advocates strongly for urgent reconsideration of this decision.

It is not in the interests of Australian healthcare consumers.

Yours sincerely,



Michael Gillespie
AOA President