



ASOHNS

The Australian Society of Otolaryngology Head and Neck Surgery

9 June 2021

Australian Competition and Consumer Commission
Via email: exemptions@acc.gov.au

Dear Commissioners

Submission to the ACCC regarding the Draft Determination on Honeysuckle Health

The Australian Society of Otolaryngology Head and Neck Surgery (ASOHNS) is the representative membership organisation for ear nose and throat, head and neck surgeons in Australia. ASOHNS members are Fellows of the Royal Australasian College of Surgeons.

ASOHNS has significant concerns regarding the application made by Honeysuckle Health and nib, particularly the impact on patients and the healthcare system in Australia. The amendments made in the draft determination do not go far enough to address the many concerns raised in initial submissions.

The application refers to a model of 'value based contracting' and involves a US corporation. There is a reasonable expectation that this would create a US-like system which is far removed from the current world-class Australian healthcare system and we do not believe it is a system which works well for patients.

Introducing an intermediate entity (the insurer) into the decision-making position as to what healthcare patients will receive is highly undesirable. ASOHNS supports the highest standards of care for all patients. We reject the lack of patient choice and cost saving measures which are part of managed care systems.

We disagree with the ACCC draft determination and urge the ACCC to reject the application.

Yours sincerely,



Professor Suren Krishnan OAM, FRACS
President, The Australian Society of Otolaryngology Head and Neck Surgery