
From: Hanne [REDACTED]
Sent: Sunday, 23 May 2021 4:17 PM
To: Exemptions
Subject: 'AA1000542 – Honeysuckle Health and nib – Submission' Response to the ACCC Draft Determination

Response to the ACCC Draft Determination

Good Afternoon,

I write to object to the ACCC draft determination.

The ACCC proposes to grant authorisation to enable Honeysuckle Health (HH) and nib (together, the Applicants) to form and operate a buying group to collectively negotiate and manage contracts with healthcare providers (Providers) on behalf of health and medical insurance providers and other payers of healthcare services.

HH will provide the Participants with data analytic services as part of contract negotiations but also on an ongoing basis to assess the performance of each Provider and benchmark their performance for each Participant against the aggregated data for the HH Buying Group.

This indicates the likely intrusion of Honeysuckle Health into the professional decision making of medical practitioners. There is no reassurance that HH and its procedures will be governed by the best interests of the patient and ethical decision making by medical practitioners particularly when these decisions may result in a reduction of financial profit.

If permission is granted, this means the introduction of US style Managed Care to Australia with the associated risk to the public. Other private health insurance companies are likely to join the Broad Clinical Partners Program following this precedent, and this potentially uncapped aggregation is likely to result in public detriment by reducing competition between acquirers of medical specialist services.

In order to address the public detriment, the ACCC proposes to impose a condition of authorisation that HH not provide the Broad Clinical Partners Program services to major private health insurers where this would result in the participants in the program representing more than 40% of the private health insurer market in any State or Territory. This would not adequately address the risk posed to the medical care of the Australian public.

US style Managed Care will result in severe detriment to the Australian public's medical care. Doctors on contract will not be free to make ethical medical decisions. Medical treatment will be controlled by non medical managers whose priority will be profits for their employer and not the best interest of the patient. Medically indicated treatment programs will be at risk to be delayed, complicated and prolonged by ongoing disputes, leading to secondary syndromes.

Yours sincerely,
Dr. H.G.Falkiner
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