
From: GABRIEL TIERNEY HICKS
Sent: Thursday, 10 June 2021 10:03 AM
To: Exemptions
Subject: AA1000542 – Honeysuckle Health – submission

To Whom It May Concern:

The ACCC draft determination to authorise Honeysuckle Health (Cigna/nib health funds) to form a health services buying group has significant and unacceptable implications on the future of healthcare delivery for Australia and should be overturned.

From a competition and consumer protection perspective, the United States health system is known internationally for its inequality, blatant economic inefficiency and debilitating financial consequences on individual consumers who must access it. The most readily anticipatable consequence of introducing this system for Australian consumers is less choice, less competition and higher costs. I believe any decision to permit such an approach in Australia is fundamentally misguided on economic grounds alone.

More significantly, the approach of 'managed care' and 'value based' healthcare at the core of this model is fundamentally unjust. This model seeks to interfere with the patient-doctor relationship at any opportunity, to reduce options for clinical decision making and restrict patient choice in order to extract profit from the encounter. The focus of the system shifts overtly from the health and wellbeing of the patient to the most profitable course of action for the insurance company. Doctors, patients, and the entire community alike are failed by a healthcare system that is not oriented around the quality of the healthcare provided.

Considering the extensive implications of this determination, it should be clear that this is a matter far beyond the scope of competition and consumer protection alone. Clearly, the ACCC is not an appropriate singular entity to make decisions about the future of Australia's health system.

If the ACCC does conclude, from a strictly economic perspective, that it should grant authorisation, I submit that it must withhold this determination as far beyond its own remit, and refer the matter to the Minister for Health to facilitate national and parliamentary debate around the implications for our health system.

Thank you for your time and consideration

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