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**From:** Paul Lambert [REDACTED]  
**Sent:** Thursday, 10 June 2021 1:57 PM  
**To:** Exemptions  
**Subject:** AA1000542 – Honeysuckle Health – submission

Dear ACCC,

I am a consultant anaesthetist and medical retrieval consultant working in South Australia, and I am writing to you to express my concerns about the proposed authorisation of Honeysuckle Health and nib (ASX:NHF) to form a health services buying group for 5 years in Australia.

The establishment of such an arrangement would consolidate great economic and bargaining power under the control of large commercial operators, whose priorities are not primarily patient care, but rather financial return. Coupled with the introduction of "value-based" services, the restriction of benefits to networks of contracted medical providers, and the use of company owned and operated data analytic services, this would constitute the introduction of managed care into Australia.

In such a situation, both medical practitioners and patients will find their decisions and the availability of services constrained by commercial imperatives, and by contracts with a large and powerful third party, rather than being able to make decisions on the basis of best medical care. Inappropriate, and unregulated, use of outcomes analysis will serve to dissuade health providers from taking on the care of higher-risk patients. Additionally (and noting that your Commission will already be limiting the size of the proposed group), it is difficult to see how the aggregation of health buying capacity under the control of large operators can increase competition in the industry, and therefore value for patients.

Experience overseas, principally in the United States, has shown that managed care has subtle and insidious beginnings, which inexorably have led to the degradation of the health systems concerned, with demonstrable adverse consequences for individual patients. Having lived in the US and having needed to avail myself of one of the health systems there, I can say that as a prospective patient this is something I very much do not want to see introduced here; it is one of the prominent and problematic features of a broken system in that country.

I urge you to take these factors into account when making your decisions around the Honeysuckle Health/nib buying group.

Thank you for your consideration.

Yours sincerely,

Paul Lambert.

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