



18th January 2021

**Private Healthcare Australia**  
Better Cover. Better Access. Better Care.

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**Dr Rachel David**  
CHIEF EXECUTIVE OFFICER

**BY EMAIL ONLY:** [exemptions@accg.gov.au](mailto:exemptions@accg.gov.au)

Michael Pappa  
Competition Exemptions Branch  
Australian Competition and Consumer Commission  
Level 17 | 2 Lonsdale Street  
Melbourne VIC 3000

Dear Michael,

**Honeysuckle Health and nib application for Authorisation AA1000542 — interested party consultation**

We refer to your email on Tuesday 12 January 2021 inviting comment in response to the application submitted by Honeysuckle Health Pty Ltd (**HH**) on behalf of itself and nib health funds limited (**nib**) (**Applicants**).

Private Healthcare Australia Limited (**PHA**) supports the application by Honeysuckle Health Pty Ltd and nib health funds limited for HH to provide the contracting services to additional health care payers and form a joint buying group (**HH Buying Group**) for the purposes of collective bargaining with providers to purchase health services.

Private Healthcare Australia Limited notes that the HH Buying Group will be voluntary and it is in the relevant organisation's control to determine whether to enter into a HPPA or MPPA based on the terms and conditions negotiated by HH.

Private Healthcare Australia is of the opinion that the new specific networks HH intends to create, will be a benefit for regional areas and consumers and the proposed review of schedules of rates and terms and conditions will benefit consumers at all levels.

PHA recognizes that the Proposed Conduct will benefit consumers across the hospital, medical specialist, medial gap and general treatment networks by reducing and in some cases eliminating out of pocket costs for consumers. It is also expected that the Proposed Conduct will improve efficiencies, reduce administrative costs and facilitate information sharing and communication for Participants with minimal potential public or market detriments.

PHA confirms that it has no concern with an authorisation period of 10 years authorisation.

As such, Private Healthcare Australia is of the opinion that the Proposed Conducts is expected to provide extensive benefits to consumers and Participants alike and supports the application for authorisation by the Applicants.

Please contact me if you wish to discuss any aspect of this letter.

Yours sincerely,

Dr Rachel David  
Chief Executive Officer, Private Healthcare Australia Limited