

3 June 2021

Australian Competition & Consumer Commission

exemptions@acc.gov.au

Dear Commissioners,

Submission to the ACCC regarding the Honeysuckle Application Draft Decision

The Australian Society of Plastic Surgeons (ASPS) is the peak body for the plastic and reconstructive surgical community in Australia. We represent over 500 Australian surgeons. All ASPS members are FRACS qualified by the Australian Plastic and Reconstructive Surgery Training Board, as administered by the Royal Australasian College of Surgeons.

ASPS has grave concerns regarding the application by Honeysuckle Health and nib health funds to create and run a health services buying group of exceptional reach.

The applicants intend to introduce a model called 'value based contracting' as per the US model introduced by Cigna in 2008 in the US.

Value-based does not equate with patient-centred care. The Cigna model too often fails to meet the needs of patients as managed care companies have a vested interest in reducing costs regardless of patient need. It is the managed care company that dictates the resources and hence the treatment that will be afforded to the patient.

ASPS supports quality of care for all patients. We reject the lack of choice and cost saving strategies that are implemented with managed care systems.

ASPS disagrees with the ACCC draft determination that has recently been released. We urge the ACCC to reject the application and respect the opinion of surgeons working at the frontline for patient safety and best practice health outcomes.

Yours sincerely,



Dan Kennedy
ASPS President