

5 February 2021

Mr Michael Pappa
Competition Exemptions Branch
Australian Competition & Consumer Commission
exemptions@acc.gov.au


Dear Mr Pappa

RE: HONEYSUCKLE HEALTH (HH) AND NIB AUTHORISATION AA1000542

Please consider this a submission in response to your letter dated 12th January 2021 on behalf of Mater Misericordiae Ltd owner and operator of:

Hospital	Public/Private
Mater Hospital Pimlico	Private
Mater Women's & Children's Hospital Hyde Park	Private
Mater Misericordiae Hospital Bundaberg	Private
Mater Misericordiae Hospital Mackay	Private
Mater Misericordiae Hospital Rockhampton	Private
Mater Misericordiae Hospital Day Unit (Mackay)	Private
Mater Private Hospital South Brisbane	Private
Mater Mothers Private Hospital	Private
Mater Childrens Private Hospital	Private
Mater Misericordiae Private Hospital Redland	Private
Mater Private Hospital Springfield	Private
Mater Private Day Hospital Brookwater	Private
Mater Adult Hospital	Public
Mater Mother's Hospital	Public

Mater agrees in principle that there could be efficiencies for the sector from such an endeavour, providing that there are strict and transparent guidelines around how it might operate in a manner that avoids cartel like behaviour or collective boycotts when one or more of their stakeholder funders do not agree a proposal from a provider.



Mater would submit that all funds must maintain the capability to negotiate with a provider outside of the HH arrangement.

Mater would further submit that any information sharing with any overseas parties be avoided (in line with current Australian Privacy Principles and legislation).

Finally, Mater would submit that any Authorisation only be granted for a 3 year period to allow the industry to better assess the impact.

If you have any questions arising out of this submission, please don't hesitate to contact me.

Yours sincerely



Michelle Somlyay
Director Revenue Strategy
Mater Misericordiae Ltd