

23 October 2023

Australian Competition and Consumer Commission  
GPO Box 3131  
CANBERRA ACT 2601

Email: [exemptions@acc.gov.au](mailto:exemptions@acc.gov.au)

**Re: The Hospitals Contribution Fund of Australia Limited - application for revocation of authorisation AA1000402 and substitution of new authorization AA1000639 - draft determination**

The Australian Competition and Consumer Commission (the ACCC) has issued a draft determination in respect of the application for revocation and substitution lodged by The Hospitals Contribution Fund of Australia Limited on 23 March 2023.

For the reasons set out in its draft determination, the ACCC proposes to grant authorization for 5 years and is now seeking comment.

Members Health is the peak body for 25 not-for-profit and member-owned health funds covering over 5 million lives. We appreciate the opportunity to comment further on this matter, and advise that we support and the draft ACCC determination.

We maintain that we do not see competition issues arising from the proposed conduct and believe that the program provided by HCF serves in the public interest.

Providing consumers with choice and certainty in pricing for preventive and diagnostic dental services increases the likelihood of early detection and treatment, thereby reducing the likelihood of more extensive and costly services in the future.

Some of the key benefits can be summarised as follows:

- More frequent visits to a dentist for a check-up are likely to result in earlier detection and treatment of dental problems and better health outcomes.
- Uncertainty in pricing is an impediment to dental visits for check-ups.
- Individuals with cover for dental services are more likely to visit dentists for check-ups than uninsured individuals without cover.

The market for private health insurance in Australia is highly competitive. Offering price certainty to consumers for health services (including through 'known-gap' dental arrangements) is an important manifestation of this competition, which is clearly beneficial to consumers.

**Putting members' health before profit**

Members Health supports initiatives that seek to provide consumers with a range of affordable health care options. We believe that the proposed conduct will contribute to achieving this objective, and we support the draft ACCC determination.

Yours Sincerely,



**MATTHEW KOCE**  
CEO, Members Health Fund Alliance