

The Competition Commission  
The dti Campus, Mulayo (Block C),  
77 Meintjies Street  
Sunnyside, Pretoria

PER EMAIL: [health@compcom.co.za](mailto:health@compcom.co.za)

25 June 2014

Dear Ms Paramoer,

**Re: Attention: Enquiry Director - The Market Inquiry into the Private Healthcare Sector**

IPASA (Innovative Pharmaceutical Association South Africa) values the opportunity to comment on the Draft Statement of Issues and the Draft Guidelines for Participation in the Inquiry into the Private Healthcare Sector. IPASA is a trade association representing manufacturers of research based medicines in South Africa.

Draft Guidelines for Participation in the market inquiry into the private health sector

IPASA appreciates the publication of the document which gives comprehensive details of what participants can expect of participation in the Inquiry. We have no further comments on the document.

Draft Statement of Issues

IPASA notes that this document sets out clearly the relationships and market dynamics that will be explored in the process of the Inquiry.

We have only two suggestions to make in this respect. Firstly, we recommend that, to ensure the Inquiry has the mandate to explore all related issues, the definition of "supplier of consumables" should be broadly interpreted to include the complete supply chains for consumables (medical devices and medicines), that is, all players involved in supply, from manufacturer to when the product reaches the patient.

Secondly, when considering the relationship between "suppliers of consumables" and "providers of healthcare finance", "healthcare facilities" and "healthcare practitioners", (sections 58, 60, 61 of Statement of Issues Document) the tendency towards vertical integration between various players in the private healthcare system is relevant.

IPASA is supportive of the Inquiry and ready to co-operate. We look forward to further engagement around this process.

Yours faithfully,



Val Beaumont  
On behalf of IPASA

**IPASA represents the following Research based pharmaceutical companies**

Abbott, AbbVie, Alcon, Allergan, Amgen, Astra Zeneca, Baxter, Bayer, Boehringer Ingelheim, BMS, Ferring, Galdema, GE, Janssen, Lilly, Malinckrodt, Merck, MSD, Norgine, Novartis, Novo Nordisk, Pfizer, Sanofi, Servier, Takeda.

For further information contact

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