

21 February 2018

Market Inquiry into the Private Healthcare Sector
c/o Meintjes & Francis Baard Street,
Block 2A, Trevanna Campus
Sunnyside
Pretoria

Email: paulinaM@compcom.co.za

Dear Madam,

PROPOSED REGULATORY INTERVENTIONS FOR LICENSING OF HEALTH FACILITIES

1. Advanced Health SA refers to previous submissions made to the HMI with regard to the emerging day hospital industry in South Africa and the barriers to entry in the wider healthcare industry.
2. We applaud the HMI's interest in the licensing procedures as set out in the 'Proposed Regulatory Intervention' document, as this matter has been a fundamental stumbling block in Advanced Health SA reaching its objectives in providing affordable, quality healthcare to South African communities.
3. As part of our previous submissions to the HMI, we hereby include the most recent documentation that we have submitted to the Health Department which is indicative of an arbitrary approach in the approval of licenses; the content of which speak for themselves. These are-
 - 3.1 a letter dated 20 December 2016 directed to the Head of the Western Cape Government: Health in terms of which Advanced Health SA objected to the extension of a license to Life Peninsula Eye Hospital in Claremont, based on a prior rejection by the Health Department of a license in that area due to *'the oversupply of private day beds'*;
 - 3.2 a letter dated 18 May 2017 directed to the Western Cape Minister of Health relating to the over-issue of licenses to Mediclinic in Stellenbosch (previously submitted to the HMI under cover of our letter dated 13 June 2017); and



Advanced Health South Africa (Pty) Ltd

Directors: GC Ferreira, CA Grillenberger, TL Legodi, D Meyer, J Naude, CJPG van Zyl, ML Janse van Rensburg (Company Secretary)
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- 3.3 an appeal dated 15 October 2017 directed to the Minister of Health, WC Province in terms whereof Advanced Health SA appealed against the decision by the Department not approve a request for conversion of 4 day beds to 4 overnight facilities in Vergelegen, Western Cape.
- 4 Representatives of Advanced Health SA will be pleased to elucidate on these matters in any oral discussions and we look forward to assist the HMI in its investigations and improvement or rectification of the current imbalances.

Kind regards,

per C E DE JONGH
GROUP LEGAL ADVISOR



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