

2 February 2024

Insurance Unit, Financial System Division
The Treasury
Langton Crescent, Parkes, ACT 2600

Via email: genetictestinglifeinsurance@treasury.gov.au

Dear Insurance Unit secretariat,

Re: Use of genetic testing results in life insurance underwriting public consultation

The Royal Australian College of General Practitioners (RACGP) welcomes the opportunity to provide feedback on the use of genetic testing results in life insurance underwriting consultation.

The RACGP supports the proposed *Option 2: Legislating a ban* included in the consultation paper.

Genetic testing offers great potential in improving health outcomes. It enables the diagnosis of genetic conditions and can help identify and manage risk for conditions such as familial breast cancer. However, these gains are at risk if people avoid testing because it may lead to them being denied personal insurance cover.

In order not to undermine the advances and to build public trust in genomics medicine, consumer protection against genetic discrimination is crucial. Therefore, the RACGP supports the concerns identified in the A-GLIMMER report's recommendations, namely:

- The Australian Government pass legislation to amend the Disability Discrimination Act 1992 ('the Act') to prohibit insurers from using genetic or genomic test results to discriminate between applicants for risk-rated insurance. The Canadian Government has included an exception to this in their Genetic Non-Discrimination Act to allow individuals to voluntarily disclose a test result to show they do not have a genetic change that runs in the family, which the Australian Government could consider including.
- The Australian Government allocate responsibility and appropriate resources to the Australian Human Rights Commission ('AHRC') to enforce, promote, educate and support individuals and all relevant stakeholders to understand and meet the new legal obligations under the Act. The AHRC should consult with a range of genetics and genomics experts and stakeholders to achieve this goal.

Thank you again for the opportunity to feedback to the use of genetic testing results in life insurance underwriting consultation. For any enquiries regarding this letter, please contact Stephan Groombridge, National Manager, Practice management, Standards and Quality Care on 03 8699 0544 or stephan.groombridge@racgp.org.au.

Yours sincerely



Dr Nicole Higgins
RACGP President