

Extracts of Southern Cross Health Insurance submissions released under the Official Information Act 1982

SCHI – Submission on Statement of Preliminary Issues - 16 June 2026	
Reference	Text
Figure [2]	Average total surgery price change percentage since FY2012 []
Figure [4]	Average total procedure cost change percentage since FY2012 []
Figure [5]	Average billed per minute (BPM) for fee-for-service surgery []
Figure [6]	Average billed per minute (BPM) difference (%) for fee-for-service surgery in []
Figure [8]	The distribution of gynaecology surgeons' billed per minute and billed per episode (for "fee for service" gynaecology surgery procedures)
Figure [10]	Surgeon billing rate per minute for gynaecology surgeons compared to []
Figure [11]	Comparison of average SCHI fee-for-service gynaecology prices to the [] for equivalent procedures
FN 63	Note for both Figure [11] and [12]: [] have been converted to NZD using the February 2026 spot exchange rate. Five-year and 10-year average spot rates, together with the 2025 PPP, were also considered, however, these did not materially change the results. The February 2026 spot rate was selected as the most conservative assumption, as it resulted in the highest NZD values. Average FFS surgeon fees are based on 2024 data and have been inflated to 2026 using the CPI.
Figure [12]	Percentage difference between average SCHI fee-for-service gynaecology prices and [] for equivalent procedures
FN 68	Letter from SCHI to RANZCOG, dated 14 November 2025.
FN 70	Letter from SCHI to RANZCOG, dated 11 March 2026.
FN 76	Note: [] have been converted to NZD using the February 2026 spot exchange rate. Five-year and 10-year average spot rates, together with the 2025 PPP, were also considered, however, these did not materially change the results. The February 2026 spot rate was selected as the most conservative assumption, as it resulted in the highest NZD values. Average FFS surgeon fees are based on 2024 data and have been inflated to 2026 using the CPI.
FN 82	Letter from SCHI to NZGA, dated 26 February 2026.
9.6(k)]	That wide class of potential victims can be compared to the very narrow group of potential beneficiaries – namely, ~130 highly-paid gynaecology surgeons (less than 0.002% of New Zealanders). Further demonstrating that the disparity between these two groups, Health NZ estimates that the average salary package for employed obstetricians and gynaecologists in New Zealand is \$343,500, []
FN 140	Health NZ "International Obstetricians and Gynaecologists - New Zealand roles". Retrieved from https://jobs.tewhatauora.govt.nz/jobs/OBGYN

Appendix One, row 23	Date: 19 May 2026 Parties: NZGA to Commerce Commission Description: NZGA filed its Application seeking authorisation and interim authorisation for collective bargaining and a Standstill Agreement.
Appendix One, row 24	Date: 25 May 2026 Parties: Commerce Commission Description: Commerce Commission published its Statement of Preliminary Issues, inviting submissions by 9 June 2026.
SCHI – Cross Submission on Statement of Preliminary Issues – 3 August 2026	
Reference	Text
FN 2	This is determined by calculating the percentage premium of the New Zealand FFS fee over [] for each procedure. These range from [] for [] to [] for []. [] is the average of these % premiums.
5.2(d)(i)	Furthermore, the majority of specialist gynaecologists in New Zealand are female, []
NERA (on behalf of SCHI) – Expert report – 3 August 2026	
Reference	Text
5.1 (Figure 3)	Figure 3: Average, minimum and maximum FFS fees, by gynaecology procedure, 2024
5.2 (77)	Figure 4 compares the average FFS fee charged to SCHI by gynaecologists with equivalent fees []
5.2 (78)	This figure shows that the average FFS fee charged by gynaecologists to SCHI exceed [] for each comparable gynaecology procedure. Across the procedures examined, the average FFS fees are [] higher than the [] for equivalent gynaecology procedures
Footnote 37	This is determined by calculating the % premium of the NZ FFS fee over [] for each procedure. These range from [] for [] to [] for []. [] is the average of these premiums.
5.2 (Figure 4)	Comparison of average SCHI FFS gynaecology prices to [] for equivalent procedures.
5.2 (Figure 4)	Source: NERA analysis of SCHI and [] Notes: [] have been converted to NZD using the February 2026 spot exchange rate. Five-year and 10-year average spot rates, together with the 2025 PPP, were also considered, however, these did not materially change the results. The February 2026 spot rates was selected as the most conservative assumption, as it resulted in the highest NZD values. Average FFS surgeon fees are based on 2024 data and have been inflated to 2026 using the CPI.
5.4 (Figure 6)	Figure 6: Interquartile range and median of FFS \$ billed per minute by surgical specialty, FY 2025
5.4 (Figure 7)	Figure 7: Cumulative percentage increase in FFS rates per minute of selected surgical specialties Source: NERA analysis of SCHI data