



**The Pharmacy
Guild of Australia**

Mr David Hatfield
Director
Adjunction Branch
Australian Competition & Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

Via email to adjudication@accc.gov.au

Dear Mr Hatfield

Re. A91579 – eRx Script Exchange Pty Ltd – submission

Thank you for inviting the Pharmacy Guild of Australia to comment on the application by eRx Script Exchange Pty Ltd (eRx) to continue a revenue sharing arrangement with IP MDS Pty Ltd, facilitating the interoperability between the parties' electronic pharmaceutical prescription exchange systems.

The Guild as the national peak body representing community pharmacy seeks to serve the interests of its members and to support the 5600 community pharmacies across Australia that dispense over 300 million prescriptions annually – a significant number of these being dispensed via the electronic transfer of prescriptions (ETP) system.

The Guild fully supports the application by eRx to continue the revenue sharing arrangements with IP MDS Pty Ltd which ensures interoperability between each of these Prescription Exchange Services (PES) and by doing so, continues the enablement of ETP.

The Guild believes this enablement results in significant public benefit including:

- Supporting the ability to deliver important professional clinical services within community pharmacy as identified in the 6th Community Pharmacy Agreement
- Generating very significant volumes of prescription and dispense medicines data which is provided to the Australian Government's My Health Record (MyHR) system under the appropriate patient consent conditions - the continuation of this interoperability is vital to maximise the data shared with the MyHR to help deliver better health outcomes for patients, and
- Recognising that ETP is widely embedded into the community GP and pharmacy sectors; supporting quality use of medicines through the more efficient and safer dispensing of prescription medicines.

The Guild believes that to maximise these benefits, maintenance of the interoperability between the two PES' in the market (eRx and MediSecure) is vital.

If you require any further information regarding this submission, please contact Matt Ryan at the Guild's National Secretariat on (02) 6270 1845 or via email matt.ryan@guild.org.au

Yours sincerely

David Quilty
Executive Director



National Secretariat

Level 2, 15 National Circuit, Barton ACT 2600
PO Box 310, Fyshwick ACT 2609
P: +61 2 6270 1888 • F: +61 2 6270 1800 • E: guild.nat@guild.org.au
www.guild.org.au

Ref: SP1034-8-44PUB