



18 May 2023

Mr David Hatfield
Director, Competition Exemptions
Australian Competition & Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601
Via email to exemptions@accc.gov.au

Dear Mr Hatfield,

Re. AA1000641 – Fred IT Group – submission

Thank you for inviting the Pharmacy Guild of Australia (the Guild) to comment on the application by Fred IT Group and its related entities (including eRx Script Exchange Pty Ltd) seeking authorisation (under the *Competition and Consumer Act 2010* (Cth) giving it legal protection from competition laws) to facilitate arrangements in transitioning from multiple parties providing prescription delivery services to Fred IT Group being the sole provider of these services.

The Guild as the national peak body representing community pharmacy seeks to serve the interests of its members and support the 5900 community pharmacies across Australia. The Guild's interest in this matter is also as partial owner of the Fred IT Group through its Victorian Branch subsidiary, Pharmacy Computers Australia.

The Guild supports the application by Fred IT Group, which if approved, will provide significant public benefit by:

- Enabling the continuity of important clinical services provided by community pharmacies across Australia
- Continuing to generate significant volumes of prescription and dispense medicines data to the Australian Government's PBS and My Health Record systems, and
- Recognising that electronic prescriptions are now widely embedded into the community GP and pharmacy sectors, supporting quality use of medicines through the more efficient and safer prescribing and dispensing of prescription medicines.

The Guild believes these benefits will continue to be realised with the Fred IT Group as the sole provider of the Prescription Delivery Service and we encourage a smooth transition to this arrangement.

If you require any further information regarding this submission, please contact Matt Ryan at the Guild's National Secretariat on [REDACTED] or via email [REDACTED]

Yours sincerely,

[REDACTED]
Suzanne Greenwood
Executive Director

National Secretariat

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