

1 October 2021

Mr Darrell Channing
Director
Competition Exemptions
23 Marcus Clarke Street
Canberra ACT 2601

Attention: Gemma Smith

Dear Darrell

I am writing in response to a copy of a notice dated 21 September 2021 by the ACCC relating to an application by WAPHA for interim exemption under Competition and Consumer Act 2010 (Cth)

Our company exists to provide commercial software and digital advance care planning systems, and we have developed these for PHNs who are tasked with innovating and digitising care planning for better patient centred outcomes. Health data extraction is a crucial component of our work towards the development of intelligent advance care planning systems involving the application of machine learning algorithms.

The proposal by WAPHA would impact the initiatives we have been discussing with PHNs, and those we are developing to meet the needs of the Australian Digital Health Agency.

We appreciate the opportunity to make this submission to notify you of our objection to the granting of this exemption.

Yours sincerely,



Dr Merran Cooper
CEO
Touchstone Life Care Pty Ltd

