

30 September 2021

URGENT

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

Attention: Gemma Smith

Dear Darrell,

Objection to WA Primary Health Alliance (WAPHA) application for authorisation AA1000577 – interested party consultation

We have been informed by the Medical Software Industry Association Ltd (MSIA) of the application by WAPHA dated 14 September for interim exemption under *Competition and Consumer Act 2010* (Cth). I strongly object to any such exemption being granted pursuant to the interim application and exemption for any longer period, that being the decade sought by the Applicant WAPHA.

I fully support the objection forwarded by MSIA. In addition to the points raised by MSIA, I too have great concern with the application by WAPHA, including:

- *Inequitable commercial playing field* – government funding vs private sector funding. One of the driving factors for innovation and delivery to market is return on investment
- *Delivery timeframes* – investment by private organisations drives the need to deadlines
- *Creation of precedents* – will this potentially lead to other instances of health-related organisations no longer going to tender for the delivery of solutions? Going to tender drives competition and always results in the delivery of innovative solutions
- *Lack of transparency* – who is to say that there isn't already a solution that a private organisation has in place that could quickly be adapted to meet this requirement? Why not see what is already available rather than "re-invent the wheel"? The customer should be front and centre, not the software developer.

I appreciate the opportunity to make this submission and look forward to your response.

Yours Sincerely,

Gerard Stevens AM
B.Pharm, M.Pharm (honoris causa), FPS, AACPA
Managing Director
Manrex Pty Ltd - Webstercare
Email: