

AAAPC

Australasian Association for
Academic Primary Care Inc.

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27 October 2021

Mr Darrell Channing
Director, Competition Exemptions, ACCC
23 Markus Clarke Street Canberra ACT 2601 GPO Box 3131
Canberra ACT 2601
Attention: Gemma Smith

Dear Mr Channing

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

Thank you for the invitation to comment on the application lodged by WAPHA.

The Australasian Association for Primary Care (AAAPC) has significant concerns of the risk of PHNs working as a block and having monopoly and control of general practice data. Data extraction is of particular importance to primary health care research because health system design is data driven. WAPHA should provide evidence of design elements in the 'Primary Sense 2' data extraction tool that would support the use of data in research. In addition, WAPHA should provide clarity on data governance. There must be transparent data governance that include processes for secondary data access to external researchers for specific research questions.

AAAPC would welcome more consultation with regards to how such an exemption will impact on innovations and expansion of data extraction in the future. We have considerable uneasiness that it will lead to anticompetitive behaviors which will limit rather than expand possibilities of primary health care data.

We appreciate the opportunity to provide comment. We would be happy to engage in further discussions on this application.

Yours sincerely,



Dr Phyllis Lau
AAAPC President

