

Pharmacy Business Ownership Bill 2023

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Committee Secretary
Economics and Governance Committee

Parliament House
George Street
Brisbane Qld 4000

11/01/2023



Dear Sir/Madam,

RE: Committee inquiry into the Pharmacy Business Ownership Bill 2023

I am writing to you as a pharmacist, and pharmacy owner in Queensland. I have reviewed the changes expected for the Pharmacy Business Ownership Bill 2023 and have multiple concerns about the future of our industry and healthcare in Australia.

My major concerns are as follows:

The definition of core pharmacy services (Clause 8(3))

Despite repeated concern and feedback, the definition of core pharmacy services in relation to what constitutes a pharmacy business remain too narrow. Currently, the definition is limited to dispensing and compounding of medicines. To put it frank, this is not remotely accurate in terms of the variety of services that a pharmacist provides in modern practice. It does not adequately describe what a pharmacy service is and in doing so it compromises how the Bill is able to deal with several issues in subsequent clauses 20(2) & 22(2)(b). If the intent of the Bill is to describe who may own a pharmacy business, a clearer more accurate definition of the services that the business provides must be provided.

The definition of a supermarket (Clause 11(3))

Concerningly, the current definition in the Bill is limited in scope and does not seek to include provision for online supermarkets. It is essential that reference to online services is included. Inclusion of the word 'premises' in the definition ensures a pharmacy business includes a building of "bricks and mortar", and is not able to capture the growing online marketplace. A suggested definition of a supermarket should include 'a premises or online store used primarily for selling a range of food, beverages, groceries and other domestic goods.'

What is a material interest in a pharmacy business (Clause 13)

The definition of a 'material interest' is inconsistent with other jurisdictions and inadequate in capturing the interest that may be held in a pharmacy business. It should include the words 'legal and beneficial'. The interest needs to be adequately defined so that when the legal requirement exists to register the interest under the Act, only lawful interests can be registered as intended by the legislature. Without appropriately defining a material interest, it means that interests that are not expressed in the current definition may not be able to be deemed unlawful interests.

I trust that these concerns are not taken lightly and my recommendations are reviewed and implemented in the Pharmacist Business Ownership Bill 2023. Please do not hesitate to reach out if further discussion is required.

Kind regards,

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