

Pharmacy Business Ownership Bill 2023

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Committee Secretary
Economics and Governance Committee
Parliament House
George Street
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Via: [EGC@parliament.qld.gov.au](mailto:<EGC@parliament.qld.gov.au)

Dear Sir/Madam,

RE: Committee inquiry into the Pharmacy Business Ownership Bill 2023

As a pharmacist in Queensland, I believe in the future of the profession and maintaining pharmacist only ownership. The Pharmacy Business Ownership Bill 2023 is a great start but I have several concerns in the Bill and would request your consideration to make the below changes. These changes will help to ensure that the scope of the Bill is sufficient to maintain public confidence in the pharmacy profession and deliver the best health outcomes for Queenslanders now and into the future.

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

- The current version of the Bill does not provide an accurate definition of what a pharmacy service is – it is far too narrow. As a pharmacist, I provide far more to my patients than just dispensing and compounding as per the current definition. One of the most important roles I do is to review my patient's medication and ensure they are appropriate and provide advice to them on their medication and general health and wellbeing. The act of dispensing a medication is only a small part of my role and with the expanded scope that is now in Queensland, these increased services must be included in the definition.
- The narrow definition limits the ability for the Bill to deal with external control and there is a risk that both current and future services offered in the pharmacy will be outside of the regulatory control of the Bill.
- I would like to see a broader definition developed for the reasons mentioned above. The definition needs to cover all of the roles a pharmacist does at present and will be doing in the near future.

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

- With the increase in online supermarkets, the definition must be broad enough to capture this. The inclusion of the word 'premises', implies that the supermarket is a physical bricks and mortar store and potentially does not cover the online business/retail outlet.
- To ensure that pharmacies do not end up in supermarkets, whether that be in a physical or online sense, the Bill must broaden the definition to cover both.
- I would like a more specific definition of supermarket to explicitly state whether the supermarket is a physical premises or online store

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

- The definition of a material interest is inadequate in capturing the interest that may be held in a pharmacy business and is not consistent with other jurisdictions. If 'material interest' is not defined appropriately, it may mean that those interests not expressed in the current

definition may therefore not be able to be deemed unlawful as they will be outside of the cope of this Bill and the councils power.

- The pharmacy ownership rules are so important and must be protected as I believe that this is in the best interest of the public and therefore the definition of material interest must be more comprehensive otherwise these rules will continue to be diluted.
- I would like to see the definition of 'material interest' be amended to cover ANY interest in a pharmacy is defined as having the right to receive any share of profits or takings from the business or associated entity.

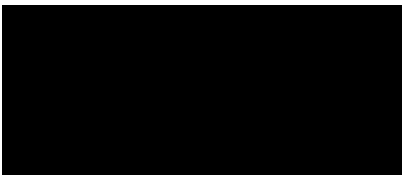
Matters relating to the Queensland Pharmacy Business Ownership Council (the council) (Clauses 147, 150, 153, 207)

Issues:

- The Bill must maintain public confidence in the pharmacy profession and therefore I believe that there should be a mandatory online public register of licenced pharmacy businesses and their relevant owners. This will ensure transparency for the public to know who the owner of the pharmacy is and act as a further deterrent for those individuals or businesses trying to get around the ownership rules.
- The council remit must be limited to the registration and licencing of pharmacy businesses and not become involved in other areas of the Act as it is in NSW.
- The composition of the council as currently proposed is not acceptable and the majority of the members should be community pharmacy business owners.
- Each committee member should have a maximum number of terms that they are able to serve to ensure that the council remains relevant and has different views and opinions.

I appreciate you taking the time to review my recommendations and I look forward to seeing the revised version of the Bill.

Yours sincerely



Jonathan Bray

