

## Pharmacy Business Ownership Bill 2023

**Submission No:** 25  
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**Submitter Comments:**

## ***RED HILL DAY AND NIGHT PHARMACY***

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Economics and Governance Committee  
Parliament House  
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14<sup>h</sup> January 2024.

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**

Firstly, I would like to thank the government in taking listening to the feedback of our the pharmacist profession and made amendments to the aforementioned Bill into its current form, which has created more clarity into the requirements of pharmacy ownership. However, further development is required as, in its current form, some ambiguity over what a pharmacy business entails still exist and will create loopholes which will undermine the intents of the Bill which we have all worked hard to create.

#### (i) Definition of core pharmacy services (Clause 8(3))

In the current iteration of the Bill, the definition of core pharmacy services is still not reflective of what our business actually do. It is disappointing that the government still, despite our continual feedback, still consider the main role of a community pharmacy is only Dispensing and Compounding. This undermines the services pharmacists and in community pharmacies provide to Queenslanders on a daily basis, including and certainly not limited to:

- Provision of clinical service or advice about medications / general ailments – regardless of whether dispensing or supply has occurred in the interaction.
- Vaccination – that is becoming a bigger part of our role – and is recognised in the EPA's expansion recently, allowing pharmacists to administer a wider range of medicines
- Prescribing of medicines (as per current prescribing trials) as well as the UTI prescribing service
- Repackaging of medication into Dosage Administration Aids

I truly believe that these needs to be included in the description of “core pharmacy services” to be accurately reflective of what I do everyday for my patients.

#### (ii) Definition of a supermarket (Clause 11(3))

The current definition of the Bill refers to supermarket as a “premises” which implies that supermarket can only exist as a brick and mortar location. The shift in technology, fuelled perhaps by the pandemic we have just experienced, has meant that supermarkets can now exist as a purely online business linked to a fulfilment centre – I believe the Bill needs to recognise this emerging retail trend and expand the definition of a supermarket to include **both** a premises location as well as online stores used primarily for selling a range of food, beverages, groceries and other domestic goods.

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(iii) Definition for a Material Interest in Pharmacy Business (Clause 13)

In its current form, the definition of a material interest in a pharmacy business does not adequately describe loopholes that exist in the ownership in a pharmacy business, which is being exploited by certain large chain business. The following amendment should address this loophole.

Clause **13(1)(c)** should say:

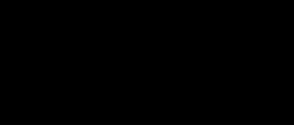
(c) any other interest, **legal** or **beneficial** in the business, other than an interest of an owner of the business.

(2) to remove any doubt, an interest includes, but is not limited to, having a right to receive consideration directly or indirectly that varies according to the profits or takings of the pharmacy business.

*The existing clause 13(2) would be renumbered 13(3)*

The community has high expectations of pharmacy and the services provided in Queensland, and I believe the proposed changes still don't meet those expectations. I am proud of the work pharmacists do for our patients and the wider community, so I urge you to consider my feedback.

Kind Regards



Michael Lu B.Pharm  
Community Pharmacist