

## Pharmacy Business Ownership Bill 2023

**Submission No:** 29  
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**Submitter Comments:**

Committee Secretary  
Economics and Governance Committee  
Parliament House  
George Street  
Brisbane Qld 4000

15/01/24

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 pharmacy owner in Queensland, I still have the following concerns despite repeated feedback and amendments and encourage further consideration by the committee. This important piece of legislation should strengthen the integrity and transparency of the profession, ensuring safe, affordable, and accessible healthcare for all Queenslanders.

In its current form, the Bills definition of material interest in a pharmacy business doesn't adequately describe the loopholes that exist in the ownership of a pharmacy business, which has been used and exploited. The loopholes should be closed with the following amendments to Clause 13:

- Any other interest, **legal** or **beneficial** in the business, other than an interest of an owner of the business
- To remove any doubt, an interest includes, but is not limited to, having a right to receive consideration, either directly or indirectly, that varies according to the profits or takings of the pharmacy business

While I acknowledge that the Pharmacy Business Ownership Act needs to be updated and modernised to include a Pharmacy Council, it shouldn't be at the expense of modifying its key foundations being:

- Only a pharmacist can own a community pharmacy business
- The number of community pharmacies owned by a pharmacist capped at five and
- Prohibition on the right of another person to control a community pharmacy

In its current iteration, the Bills definition of core pharmacy services isn't reflective of the services my pharmacy provides for my patients and the community. Its unfortunate that our main role is still being considered by the government as just compounding and dispensing. It should include (but is not limited to):

- Vaccinations – over the last few years has become a large part of the services we provide
- Dose Administration Aids
- Prescribing of medicines – as seen in the Urinary Tract Infection pilot program that was legislated for permanent practice and for the upcoming prescribing trials in Far North Queensland
- Provision of other clinical services

The current definition in the Bill refers to a supermarket as a 'premises' which suggests that it can only exist in a physical location. As there has been a shift in technology its meant that supermarkets can now exist as purely online businesses using fulfilment centres. The definition in the bill needs to be amended to include both a premises location and online stores used primarily for the purchase of food, beverages and other grocery or household items.

I believe it's valuable for governing bodies to consider feedback and input from the people that this Bill has potential to harm; both pharmacists and our businesses and the patients we care for every day. By considering these issues the committee can work toward reform in closing loopholes and restoring integrity to the community pharmacy in Queensland.

I appreciate the opportunity to provide feedback at this time.

Regards,



Carolyn Clementson

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