

Pharmacy Business Ownership Bill 2023

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Capri Chempro Chemist

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Committee Secretary
Economics and Governance Committee
Parliament House
George Street

Date: 19/01/2024

Dear Sir/Madam,

Re: Committee inquiry into the Pharmacy Business Ownership Bill 2023

I am writing to you, as a pharmacy business owner of Capri Chempro Chemist, located on the Gold Coast. I wish to advise of my concerns about the Pharmacy Business Ownership Bill 2023.

I have been working in community pharmacy for more than 7 years and have recently purchased my first pharmacy in Queensland. Community pharmacy is my passion because I can interact more personally with customers and provide tailored advice. I want to promote a community and family-centred model of pharmacy—not a “warehouse” model of pharmacy. Having the ability to connect and engage with my customers is important to me and to be able to support the higher percentage of elderly customers who may need further assistance with medication advice.

I'm extremely concerned by the changes as the following factors below:

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

- The current version of the Bill does not adequately define what a pharmacy service is.
- The definition is too narrow and is limited to dispensing and compounding of medicines only. This is not an accurate reflection of the services that a pharmacist provides and means that, for example, where the dispensing of a medicine is considered a pharmacy service, the provision of advice about that medicine, is not.
- By having a narrow definition of pharmacy services, it limits how the Bill is able to deal with the concept of external control of how pharmacy services are delivered to the public (clause 22). If control of pharmacy services is linked to the definition of *core pharmacy services* then there is a risk that a number of relevant pharmacy services will be left outside the regulatory control of the Bill.
- Where the intent of the Bill is to describe who may own a pharmacy business, a robust definition of what constitutes a pharmacy business (through definition of the services that business provides) must be offered as part of the Bill.

Proposed change:

- To adopt a broader definition of ‘core pharmacy services’ as ‘pharmacy services’:

pharmacy services means –

(a) health services (including dispensing, supply, prescribing, selling, administering, repackaging, compounding, possessing, disposing of medicines and the provision of clinical service or advice (either at or from a licensed premises or through digital platforms)) provided in the course of practice by a pharmacist or a person who holds themselves out, or is held out by another, as a pharmacist;

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

Issues:

- The definition of a supermarket is not broad enough to capture the likely increase in online supermarket businesses in the future.
- By inclusion of the word 'premises' in the definition, it ties the concept of a supermarket to a bricks and mortar place, and it is not able to capture the growing online marketplace.
- To ensure that the policy objective of the Bill to 'prohibit the council from issuing a licence if the pharmacy business is located in a supermarket' is met, the Bill must have application to pharmacy businesses and supermarkets whether they are online or physical locations.

Proposed change:

- To adopt the following definition of a supermarket:

supermarket means a premises or online store used primarily for selling a range of food, beverages, groceries, and other domestic goods.

Due to these reasons, I cannot support the changes within this Bill and therefore, ask you to consider Queensland pharmacists, their businesses, and their patient's health and wellness carefully.

Kind Regards

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