



**The Pharmacy  
Guild of Australia**  
WA Branch

## **Response from the Pharmacy Guild of Australia WA Branch (PGAWA)**

### **Economic Regulatory Authority Draft Report Inquiry into the reform of business licensing in Western Australia Licensing Enquiry (LicInq)**

The Pharmacy Guild of Australia WA Branch (PGAWA) notes the commentary on pages 54 and 55 of the Economic Regulation Authority draft report into the reform of Western Australian business licensing authorities. The draft report refers to recommendations arising from the Commonwealth's 2014/15 Competition Policy Review report and makes the statement that the licensing scheme creates an unnecessary barrier to pharmacy ownership in Western Australia.

We note this recommendation has not been taken up by government for good reason. The Australian PBS distribution and supply system is recognised as world's best practice guaranteeing safe supply of all medicines on the PBS to every Australian at a known cost no matter where they live. That is the delivery of the National Medicines Policy is underpinned by the community pharmacy network.

As noted in numerous submissions to the Competition Policy Review the translation of economic paradigms and modelling into the safe delivery of quality health services and development of sound health policy is not simple and can have serious implications and invites unforeseen outcomes if we get it wrong.

The ERA draft report references the unpublished West Australian Government Review of Community Pharmacy Ownership. The government's Community Pharmacy Ownership Review Discussion paper released October 2017 which among other observations made the following statement:

- There are reasonable arguments for the continued need to regulate pharmacy premises, in at least some manner, for public benefit

The discussion paper also noted:

- The profession is heavily regulated and the reasons for that are still present today
- Medicines are not ordinary items of commerce

- Pharmacies are unique amongst health practitioner businesses and they need to be safe places for patients to enter and suitable to the delivery of the type of care they offer
- The intent of the existing regulation of pharmacies in WA is to ensure the protection of the public and result in overall community benefit
- The rules prevent undue external influences that compromise standards of professionalism and;
- Reduce conflicts of interest including horizontal and vertical integration of the supply chain by pharmacists of other interests

The Guild also refers the authority to the outcomes and recommendations of the recent Queensland Government ‘Inquiry into the establishment of a pharmacy council and transfer of pharmacy ownership in Queensland’ released October 2018.

We note that the WA Pharmacy Registration Board is regarded as the exemplar authority in Australia meeting its statutory obligation to oversee and enforce the WA Pharmacy Act 2010, the primary purpose of which is to ensure public safety in the distribution and supply of medicines.

As noted the recommendation of the Commonwealth 2014/15 Competition Policy Review made its recommendations prior to the WA Ownership review. The outcome of this review will assist the WA government to make decisions on the regulation and role of community pharmacy in the wider consideration of the delivery of health services to the West Australian community.

The Guild respectfully tenders our response for consideration in the ERA Licensing Review final report.

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