



The Pharmacy
Guild of Australia

SUBMISSION

Inquiry: Health Legislation Amendment (Improved Medicare Integrity and Other measures) Bill 2025

4 March 2025

The Pharmacy Guild of Australia National Secretariat

National Secretariat

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ABOUT THE GUILD

The Pharmacy Guild of Australia (the Guild) is the national peak organisation representing community pharmacy. It supports community pharmacy in its role of delivering quality health outcomes for all Australians. It strives to promote, maintain, and support community pharmacies as the appropriate providers of primary healthcare to the community through optimum therapeutic use of medicines, medicines management and related services. Community pharmacies are the most frequently accessed and most accessible health destination, with over 443 million individual patient visits annually and the vast majority of pharmacies open after-hours, including on weekends.¹

Owned by pharmacists, community pharmacies exist in well-distributed and accessible locations, and often operate over extended hours, seven days a week in urban, regional, rural and remote areas. They provide timely, convenient, and affordable access to the quality and safe provision of medicines and healthcare services by pharmacists who are highly skilled and qualified health professionals. In capital cities, 97% of people have access to at least one pharmacy within a 2.5km radius, while in the rest of Australia 74% of people are within 2.5km of a pharmacy.²

The network of almost 6,000 equitably distributed community pharmacies plays a pivotal role in the delivery of the National Medicines Policy, by ensuring timely access to safe, effective, and affordable medicines under the Pharmaceutical Benefits Scheme (PBS) for all Australians. Quality Use of Medicines is an important pillar of Australian National Medicines Policy, with community pharmacy having a vital role in the prevention and treatment of communicable and chronic diseases.

GUILD RESPONSE TO INQUIRY

The Guild supports the multiple measures contained in the Health Legislation Amendment (Improved Medicare Integrity and Other Measures) Bill 2025³ that specifically relate to the community pharmacy approval process. The Bill contains a number of measures intending to improve pharmacy approval processes by making the processes simpler and more efficient. These changes are as follows:

- Reducing the timeframe in which the Minister may exercise their discretionary power by replacing the current two stage process, which can take up to three months for each stage, with a single stage process of up to four months. This intends to reduce the administrative burden on staff resources and provide the community with more timely access to pharmaceutical benefits in circumstances where the Minister approves a request to exercise the discretionary power.
- In circumstances where the Minister decides not to exercise discretion to approve a request, the amendments will prevent the applicant from making another request to the Minister for the same premises as the initial request within 12 months of the initial request to the Minister, as the circumstances are unlikely to have changed.
- Removing the need for the Minister to approve changes to an administrative form relating to the Ministerial discretion process. Currently this approval function of the Minister cannot be delegated, and any changes to the form must be approved by the Minister. The amendments are expected to increase administrative efficiencies.
- Increasing the membership term for the Australian Community Pharmacy Authority from 2 years to 3 years. Currently the process for seeking nominations and subsequent endorsement of the nominees is administratively burdensome on nominating organisations and the Australian Government. Increasing the term of membership will reduce administrative burden and provide greater stability to the Authority.

¹ Guild Digest 2023

² The Pharmacy Guild of Australia 2025

³ Parliament of Australia, Health Legislation Amendment (Improved Medicare Integrity and Other Measures) Bill 2025, https://www.aph.gov.au/Parliamentary_Business/Bills_LEGislation/Bills_Search_Results/Result?bld=r7292

The Guild does not wish to comment on any other measures included in the Bill. The Guild looks forward to further consultation on the amendments contained in the Bill, if and where needed.