

**SUBMISSION TO THE REVIEW OF NATIONAL COMPETITION
REFORMS, PRODUCTIVITY COMMISSION DISCUSSION DRAFT
DOCUMENT (December 2004)**

Introduction

The Pharmacists Division of the Association of Professional Engineers, Scientists and Managers Australia (APESMA) is an industrial organisation that represents employee community pharmacists across Australia. As such, we will be focused on commenting on the parts of the Review document that relate to health issues.

Comments

1. The Pharmacists Division supports the proposal that applies to Health care on page XLI and page 268 of the Review document. We also support a review of medical workforce issues. We assume the workforce review would cover **all** healthcare professions.
2. The Pharmacists Division supports the finalisation of Wilkinson Review recommendations that relate to restriction of location rules for community pharmacies. Attached is the Pharmacists Division's Issue Paper Number 3 on restriction of PBS Approval numbers, that supports our view that these restrictions should be abandoned to provide competition in the marketplace.
3. The Pharmacists Division has concerns that the Community Pharmacy Agreement is protected under section 51(1) of the TPA and as such protects practices that may ordinarily be regarded as anti-competitive. Attached is a copy of our submission to the Trade Practices Act review in 2002.

Conclusion

The Pharmacists Division supports competition in the community pharmacy industry. We would like to be involved in any future reviews that are undertaken by Government.

Paul Gysslink
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