



The Pharmacy  
Guild of Australia

11 June 2021

Toby Robinson  
Director – Consumer Policy and Currency Unit  
Competition and Consumer Branch  
Market Conduct Division, Markets Group  
The Treasury, Langton Crescent, Parkes ACT 2600

Dear Mr Robinson

**Consultation on the exposure draft of the Competition and Consumer (Industry Codes - Unit Pricing) regulations**

Thank you for contacting the Pharmacy Guild of Australia regarding the exposure draft of the proposed new Unit Pricing regulations.

The Pharmacy Guild of Australia (the Guild) is the national peak organisation representing community pharmacy. We support community pharmacy in its role delivering quality health outcomes for all Australians. We strive to promote, maintain and support community pharmacies as the most appropriate primary providers of health care to the community through optimum therapeutic use of medicines, medicines management and related services.

We note that the exposure draft does not include community pharmacy, which we support, as we believe there is no economic case for the community pharmacy market to be included in the Code.

We also continue to recommend that medicines and other health care products sold in grocery stores should be included in the Code's exemption list. Unit Pricing has the potential to send the wrong message to consumers and they may purchase medicines in inappropriately or in larger quantities than is clinically required leading to misadventure and harm.

Unit Pricing is inconsistent with Quality Use of Medicines principles and all medicinal and health care products. Any product that is registered on the Australian Register of Therapeutic Goods (ARTG) should be exempt from the Unit Pricing Code irrespective of where it is sold.

If there are any queries, please contact me or Danica Davies (email: [Danica.davies@guild.org.au](mailto:Danica.davies@guild.org.au)) at the Guild's National office.

Yours sincerely

Dr Philip Chindamo  
*Chief Economist*  
*Director, Health Economics & Policy*

**National Secretariat**

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