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Dear Mr Marty

**RE: PHARMACY BOARD OF AUSTRALIA GUIDELINE CONSULTATION**

Thank you for your letter of 29 September 2010 regarding the Consultation draft Guideline *Responsibilities of Pharmacists when Practising as Proprietors*.

The Department of Health (the Department) supports the development of the Guideline as a means of ensuring that pharmacy services are of a high professional standard.

The principles espoused in the Guideline are supported. Two additional matters that might be considered for inclusion are:

- broadening the scope to make it clear that the Guideline covers all models of pharmacy ownership, i.e. not only individual proprietor pharmacists, but also pharmacists who hold a position of authority in a corporate pharmacy services provider or who act as a pharmacy services provider as a trustee of a trust;
- require that the owner provide the physical (e.g. equipment, facilities, reference materials) and personnel resources that would permit a pharmacist who is in charge of a pharmacy to be able to comply with the applicable legislation and Pharmacy Board of Australia Guidelines.

Thank you again for providing the opportunity to comment on the draft Guideline.

Yours sincerely

**DR TONY SHERBON**  
Chief Executive

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