

Guidance Note

Standards for premises

Pharmacy Business Ownership Regulation 2025



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Introduction

Purpose

The Guidance Note on the standards for premises (Guidance Note) aims to support pharmacy business owners, and their staff, to understand the requirements that proposed pharmacy premises must meet to be licensed.

Scope

The Guidance Note is general in nature. It has been developed to assist pharmacy business owners to meet their obligations under the standards for premises in the *Pharmacy Business Ownership Regulation 2025* (Premises Standards). However, it should not be relied on as an exhaustive statement of the relevant law. Owners should carefully consider how the [Pharmacy Business Ownership Act 2024](#) (PBO Act) and [Pharmacy Business Ownership Regulation 2025](#) (PBO Regulation) apply to their business and obtain independent legal advice if needed. This Guidance Note does not override or vary the requirements of the Premises Standards prescribed in the PBO Regulation. To the extent there is any inconsistency, the Premises Standards will prevail.

The Guidance Note will be reviewed regularly by the Queensland Pharmacy Business Ownership Council (Council) to ensure it reflects the Council's risk-based approach and current policies, and any changes in legislation. It will also be subject to ongoing refinement to ensure it remains current and responsive to modern pharmacy practice.

Using this Guidance Note

The Guidance Notes sets out:

- each standard that the premises must meet, and
- further information on the standard and expectations of the Council.

The Premises Standards have been developed to establish baseline requirements applicable to all pharmacy businesses in Queensland, irrespective of geographic location, pharmacy services provided or size. While there are minimum levels required to ensure compliance, Council inspectors will assess each pharmacy business having regard to its individual circumstance, for example, the scope of pharmacy services provided. This approach ensures that regulatory expectations are applied proportionately and appropriately.

The Council recommends pharmacy business owners, and their staff, regularly review this Guidance Note, particularly when applying for a licence and undertaking any significant alterations to the pharmacy premises.

The pharmacy business owner holds ultimate responsibility for carrying on the pharmacy business in accordance with the PBO Act and PBO Regulation.

If you have a question about the Premises Standards, please contact the Council on phone number (07) 3325 6200 or email applications@pboc.qld.gov.au

For general information about the Council or the PBO Act go to [Queensland Pharmacy Business Ownership Council's website](#).

Glossary

Term	Meaning
Authorised pharmacist	Authorised pharmacist, for a licensed pharmacy business, means— (a) a holder of the pharmacy business licence for the business who is a practising pharmacist; or (b) a practising pharmacist who is— (i) a director or shareholder of a holder of the pharmacy business licence for the business; or (ii) employed by a holder of the pharmacy business licence for the business to carry on the business.
Authorised premises	Premises are authorised premises if the premises are not located in, or directly accessible from, a supermarket; and meet the standards prescribed by regulation.
Compound	Compound, a medicine— (a) means mixing, compounding, formulating or reconstituting a medicine with any other substance for a particular patient or animal; but (b) does not include— (i) reconstituting a medicine that is included in a product on the Australian Register of Therapeutic Goods for a particular patient or animal in accordance with the manufacturer’s instructions for reconstituting the medicine; or (ii) mixing a medicine with feed for administration to a group of animals on a prescription.
Dispense	Dispense, a medicine, means sell the medicine to a person on prescription.
Dispensary	Dispensary means an area dedicated to storing and dispensing medicines.
Licensed premises	Licensed premises, for a licensed pharmacy business, means the premises in relation to which the pharmacy business licence for the business is in effect
Practising pharmacist	A practising pharmacist is a person who is registered under the Health Practitioner Regulation National Law to practise in the pharmacy profession with general registration.
Sell	Sell, a regulated substance, includes attempt to sell the substance or make the substance available for sale.
Supermarket	Supermarket means premises used primarily for selling a range of food, beverages, groceries and other domestic goods.

Background

Legislative background

Under the PBO Act, a pharmacy business licence can only be issued to a pharmacy business owner if the proposed premises for the business are authorised premises.

Premises are authorised premises if the premises:

- are not located in, or directly accessible from, a supermarket; and
- meet the standards prescribed by the PBO Regulation.

The PBO Regulation prescribes the:

- standards that pharmacy premises must meet to be considered authorised premises (Premises Standards), and
- fees payable under the PBO Act.

Development of the Premises Standards

In developing the Premises Standards, the following existing requirements were considered:

- *Medicines and Poisons Act 2019, Medicines and Poisons (Medicines) Regulation 2021* and associated instruments (Departmental Standards and Extended Practice Authorities)
- *Public Health Act 2005*
- premises standards (or similar) from other jurisdictions
- Pharmacy Board of Australia's Guidelines
- Pharmaceutical Society of Australia Professional Practice Standards and Australian Pharmaceutical Formulary, and
- Quality Care Community Pharmacy Standard AS85000:2017.

Inspections

The Council may inspect a pharmacy premises:

- when an application for a licence is made
- when there is an application to change a licensed premises
- as part of routine inspections
- when triggered by a complaint or notification, and
- by way of targeted inspections to address emerging risks.

In all instances, a risk-based approach will be used to triage and prioritise inspections. Pharmacy business owners will pay fees for inspections relating to applications only. For further information on applicable fees go to the [Council's website](#).

Additional requirements under the PBO Act relating to pharmacy premises

Pharmacy businesses in, or directly accessible from, a supermarket

There is a limited exception to the restriction on a pharmacy business being located in, or directly accessible from, a supermarket, for existing businesses only. The exception only applies if, on 28 March 2024, the business was operating at a premises that is in or directly accessible from a supermarket. The exception applies for as long as the business is continually carried out by the same owner. The exception will not apply, for example, if the business changes ownership or relocates to different premises.

Licensed pharmacy business must be carried on at or from licensed premises

An owner must carry on the licensed pharmacy business only at or from the licensed premises for the business. Compounding, dispensing and selling of medicines can only occur at the licensed premises. Other pharmacy services may also be provided at another place, for example, administering immunisation medicines (vaccines) as an outreach service, as long as they are provided under the direction of the owner or authorised pharmacist. The licensed premises must be the place where the business primarily provides its pharmacy services.

Authorised pharmacist for licensed pharmacy business must be present at licensed premises

Pharmacy business owners must ensure an authorised pharmacist is personally present at the licensed premises when the business is open, other than for periods totalling no more than one hour per day (unless approved by the Council).

Changing licensed premises

The holder of a pharmacy business licence may apply to the Council to change the licensed premises (e.g. if the pharmacy business is relocating). The Council must grant the application prior to the pharmacy business relocating.

Notification of temporary closure of licensed pharmacy business

If a holder of a pharmacy business licence is proposing to temporarily stop carrying on the pharmacy business for a period of more than one week (e.g. close the business to the public), they must notify the Council. This must occur prior to the closure unless the licence holder has a reasonable excuse (e.g. due to an unexpected disaster event such as a cyclone or flood).

Premises Standards

Section	Requirements	Further information
1	<p>The premises must be a building or other structure, or a part of a building or other structure, and must not, for example, be a caravan or vehicle.</p>	<p>The PBO Act defines premises to include a caravan or vehicle. This standard makes clear that a pharmacy business cannot have a caravan or vehicle as its licensed premises. Dispensing, compounding and selling of medicines can only occur from the licensed premises. The PBO Act allows some pharmacy services, aside from dispensing, compounding and selling of medicines, to be undertaken at another location. This means a pharmacy business could, for example, provide administration of vaccines as an outreach service from a caravan or vehicle. All other regulatory requirements, for example, any requirements under the <i>Medicines and Poisons Act 2019</i>, must be met.</p>
2	<p>The premises must be appropriately lit, temperature-controlled and ventilated to ensure the following are not compromised—</p> <ul style="list-style-type: none"> (a) the integrity of medicines kept at the premises; (b) the standard of pharmacy services provided at the premises; (c) the safety and comfort of persons at the premises. 	<p>Lighting within the pharmacy premises must be appropriate to the nature of the activities undertaken, ensuring adequate illumination for all professional, clinical and administrative tasks performed at the pharmacy business. Medicines must not be exposed to direct sunlight or ultraviolet light.</p> <p>Medicines must be stored at their recommended temperature. For most medicines, this means room temperature not exceeding 25°C. Air-conditioning, or other appropriate equipment, must be in place to consistently maintain the required temperature, including during periods when the pharmacy business is closed. The Council acknowledges that some pharmacy premises may be situated or constructed in a manner that means it is not possible to prevent this</p>

Section	Requirements	Further information
		<p>temperature from being exceeded. The pharmacy business must have procedures in place to regularly monitor and document room temperatures, and for corrective action to be taken if required.</p> <p>All working areas must be adequately ventilated to support a hygienic environment, minimise cross-contamination, and maintain personal comfort for staff and patients.</p>
3	<p>The premises must be kept appropriately organised and uncluttered to ensure the following are not compromised—</p> <p>(a) the standard of pharmacy services provided at the premises;</p> <p>(b) the safety and comfort of persons at the premises.</p>	<p>The pharmacy business must have systems in place to ensure it is always maintained in a manner conducive to a health care environment and a safe workplace. This includes:</p> <ul style="list-style-type: none"> • keeping work areas, aisles and counters clear to reduce hazards and prevent dispensing errors • managing unpacking of stock so it does not obstruct customer or staff movement, and ensuring boxes and deliveries are cleared promptly • ensuring fixtures, fittings and equipment are kept clean, tidy and in good repair, and • maintaining the pharmacy premises to minimise the entry of debris, pests or vermin.
4	<p>The premises must—</p> <p>(a) be clean and hygienic; and</p> <p>(b) have appropriate measures in place to ensure—</p> <p style="padding-left: 40px;">(i) the premises are kept clean and hygienic; and</p>	<p>The pharmacy business must have processes and equipment to support appropriate infection control sufficient for the pharmacy services provided.</p> <p>The <i>Public Health Act 2005</i> requires certain health care facilities (such as pharmacies) that provide certain health services (such as administration of vaccines) to have an Infection Control Management</p>

Section	Requirements	Further information
	<p>(ii) the risk of contamination of medicines at the premises is minimised; and</p> <p>(iii) the risk of infection at the premises is minimised.</p> <p>Examples of measures for paragraph (b)— <i>hand washing facilities, sharps disposal, clinical waste disposal, cleaning arrangements</i></p>	<p>Plan. For further information on Infection Control Management Plans go to Queensland Health's website.</p> <p>The Council will consider the Infection Control Management Plan when assessing compliance with this standard.</p> <p>For other pharmacy businesses, evidence of the following measures as a minimum will be required:</p> <ul style="list-style-type: none"> • provision of accessible handwashing or sanitisation facilities • pharmacy premises being kept clean and hygienic, with regular cleaning and disinfection of surfaces and equipment • staff to use appropriate personal protective equipment for tasks such as preparing dose administration aids, compounding, or handling hazardous medicines • storage of medicines and equipment in clean, dry areas protected from contamination, with compounding equipment kept in designated hygienic spaces, and • appropriate collect and disposal of waste, including sharps and clinical waste.
5	<p>The premises must have a sink that—</p> <p>(a) is supplied with hot and cold running water; and</p> <p>(b) has an integrated drainer.</p>	<p>A sink is an essential feature of a pharmacy premises as it enables proper hand hygiene. It also allows for the effective cleaning of equipment and utensils, supporting infection control and safe pharmacy practice.</p>
6	<p>The premises must have a dispensary that—</p> <p>(a) is of an appropriate size and design to ensure the standard of dispensing medicines and tasks associated with dispensing medicines are not compromised; and</p>	<p>There is no specified minimum size for the dispensary area.</p> <p>The dispensary must be designed to:</p> <ul style="list-style-type: none"> • prevent public access

Section	Requirements	Further information
	<p>(b) has a refrigerator dedicated to storing medicines with an internal temperature capable of being monitored and controlled at all times; and</p> <p>(c) has all other equipment necessary for dispensing medicines or performing tasks associated with dispensing medicines, including, for example, a barcode scanner; and</p> <p>(d) is constructed in a way that minimises the risk of unauthorised access to the dispensary.</p>	<ul style="list-style-type: none"> • provide sufficient free bench space with impervious surfaces for dispensing and compounding activities, excluding sinks or equipment tops • include at least one dispensing station with a barcode scanner, label and repeat printers • provide additional bench areas as needed for order unpacking, administrative work, or simple compounding near a sink • be equipped with appropriate, calibrated, and well-maintained equipment necessary for dispensing, compounding, and safe delivery of pharmacy services • provide access to relevant references and publications to support pharmacists providing pharmacy services, and • support confidentiality, minimise interruptions and distractions, and avoid use as a thoroughfare for staff. <p>Pharmacy business owners should regularly assess the adequacy of the dispensary to ensure it remains fit for purpose as pharmacy services expand.</p> <p>The dispensary must have a dedicated refrigerator for storing medicines that require cold chain management, such as vaccines and other temperature-sensitive products. The refrigerator must comply with the National Vaccine Storage Guidelines: 'Strive for 5' and must be used exclusively for medicines (not food or personal items).</p> <p>Pharmacy business owners must also consider existing pharmacy premises requirements under the Medicines and Poisons Act 2019 framework.</p>

Section	Requirements	Further information
7	<p>The premises must have an area, for conducting private consultations with customers of the pharmacy business carried on at the premises, that—</p> <p>(a) is separate from the dispensary at the premises; and</p> <p>(b) is of an appropriate size and design to ensure—</p> <p style="padding-left: 40px;">(i) the comfort of persons involved in the consultation, including, for example, by including appropriate seating; and</p> <p style="padding-left: 40px;">(ii) the risk of the consultation being seen or heard by someone who is not involved in the consultation is minimised; and</p> <p style="padding-left: 40px;">(iii) the area contains all equipment necessary for conducting the consultation; and</p> <p style="padding-left: 40px;">(iv) the standard of the consultation is not compromised.</p>	<p>There is no requirement to have a consultation room (i.e. a fully private, enclosed room).</p> <p>However, the pharmacy premises must have an area where pharmacists can hold private and confidential discussions with customers. This area must be designed to:</p> <ul style="list-style-type: none"> • ensure conversations cannot be overheard, medicines and documents cannot be seen by other customers, and consultations are free from interruption (e.g. away from the main thoroughfare of the pharmacy business) • incorporate privacy screens or other arrangements that provide equivalent protection • be equipped with appropriate, calibrated, and well-maintained equipment necessary for the relevant pharmacy service being provided, and • provide access to relevant references and publications to support pharmacists providing pharmacy services. <p>Pharmacy business owners should regularly assess the adequacy of the consultation area to ensure it remains fit for purpose as pharmacy services expand.</p> <p>Where separate consultation rooms are provided, they must be accessible, fit for purpose, and suitable for the pharmacy services being provided.</p> <p>Pharmacy business owners must also consider existing pharmacy premises requirements under the Medicines and Poisons Act 2019 framework.</p>

Section	Requirements	Further information
8	<p>The premises must be constructed in a way that minimises the risk of unauthorised access to the premises.</p>	<p>Pharmacy premises must be constructed to minimise the risk of unauthorised entry through areas such as ceilings, roofs, wall cavities or adjoining tenancies. These areas should be designed and maintained to minimise risk of forced entry. This may include ensuring ceiling panels cannot be easily lifted, roof spaces are secured, and walls and partitions are robust.</p>
9	<p>Each means of access to the premises must be able to be secured in a way that minimises the risk of unauthorised access to the premises.</p> <p>Examples of a means of access— <i>door, window, skylight</i></p>	<p>Pharmacy premises must be constructed and maintained to minimise the risk of unauthorised access through all potential entry points, including doors, windows and skylights. External doors should be of solid construction and fitted with secure locking systems, with consideration given to additional measures such as security grilles, roller shutters or bollards. Windows and skylights must be lockable, with bars, grilles, security film or other reinforcements used where appropriate to minimise risk of forced entry.</p> <p>Keys, swipe cards and access codes to the pharmacy business must be strictly controlled to minimise the risk of unauthorised access. Measures may include a key register recording who has access at any given time, restricted keying systems to minimise risk of unauthorised duplication of keys, and unique alarm codes which are updated promptly as access arrangements change.</p>
10	<p>The premises must have equipment that detects unauthorised access to the premises at all times an authorised pharmacist for the pharmacy business carried on at the premises, or a person under the direction or control of the authorised pharmacist, is not at the premises.</p> <p>Examples—</p>	<p>Pharmacy premises must have a security system to detect and deter unauthorised access. This may include intrusion detector alarms, CCTV cameras or security patrols.</p> <p>Security systems and devices must be tested regularly to ensure they are functioning effectively, with professional advice sought from security specialists where appropriate.</p>

Section	Requirements	Further information
	<i>alarm system, security cameras</i>	
11	<p>If the premises are licensed premises, the premises must have the following information on display to customers of the pharmacy business carried on at the premises—</p> <p>(a) the name of each holder of the pharmacy business licence for the business;</p> <p>(b) if the authorised pharmacist for the business is not a person mentioned in paragraph (a)—the name of the authorised pharmacist.</p>	<p>This signage must be prominently displayed and of sufficient size to be clearly read by members of the public. Signs should be positioned in highly visible locations, such as near the main entrance to the pharmacy premises, to ensure they are easily noticed and understood.</p> <p>The information displayed on the sign must exactly match the licence holder’s details as stated on the current pharmacy business licence.</p>

Frequently asked questions

Am I required to submit a floor plan to the Council?

No, the Council will not require a floor plan or locational plan to be submitted. Compliance with the Premises Standards will be assessed through inspections of the premises.

What do I need to do if my pharmacy undergoes a refit or alterations?

It is the pharmacy business owner's responsibility to ensure the premises complies with the Premises Standards at all times. There is no requirement to notify the Council. Compliance with the Premises Standards will be assessed through inspections of the premises.

What happens if the pharmacy premises does not meet the requirements of the Premises Standards?

If the Council identifies that a pharmacy premises does not meet the Premise Standards, it will initially work with the pharmacy business owner to address the issues. It may be necessary to place conditions on the licence to ensure compliance. Where there is repeated or serious non-compliance, outcomes may include refusing to grant a licence, suspending or cancelling a licence. The Council's response will be proportionate to the risk posed to public safety and the safe operation of the pharmacy business.

Version control

Version	Date	Comments
V1.0	3 October 2025	Approved by Chief Executive Officer