

## Council disciplinary levy and APC fee 2025/26 consultation – submissions by individual

Name	Emailed responses
Aidan Kortegast	<p>To the Pharmacy Council of New Zealand, I am writing to express my strong concerns regarding the proposed increase in the Annual Practising Certificate (APC) fee to \$1020. The high cost has been a major factor in my decision not to renew my registration next year. With a plethora of options available in pharmacy overseas and in other fields, it no longer makes financial sense to continue a career in pharmacy in New Zealand.</p> <p>While I understand that the Council has outlined justifications for its operational costs, I believe that the profession has reached a point where the cost of registration has become unsustainable for many. The time has come for the Council to consider alternative solutions to reduce these fees. Perhaps it would be prudent to strongly consider a merger of regulatory bodies, similar to the APHRA model, to address role duplication and alleviate the disparity in disciplinary levies.</p> <p>To address the rise in both the number and complexity of notifications, I encourage the Council to incorporate a focus on systemic issues within its findings and recommendations, rather than focusing solely on the individual pharmacist or pharmacy. Examining factors such as IT infrastructure, funding decisions, and resource allocation, which often present opportunities for improvement, could reveal underlying causes that contribute to recurring issues. This approach would be an effective strategy for reducing errors across the profession and, ultimately, for enhancing public safety on a national scale.</p> <p>I hope my decision to step away is sufficient evidence that the high fee is not merely a point of frustration but is actively contributing to attrition in the profession—something that may have broader implications for the workforce and patient access to care in the future. I wish the organisation and my colleagues reading this all the best. Kind regards, Aidan Kortegast</p>
Mark Bedford	<p>I fully support the PCNZ proposal and congratulate the team for the comprehensive series of information relating to the reasons for the increase.</p> <p>Whilst any profession may resist increases, especially in the current environment, the stark fact that health regulation is funded by the specific professions, and unfortunately for pharmacy, the number of registered pharmacists is small compared to other health professions so the high cost of the APC is directly proportional to</p>

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	<p>the relatively small number of registered pharmacists. This fact is often conveniently ignored by the pharmacy profession. Previously there was some exploratory work done on the amalgamation of some of the common functions within health regulation, and maybe it is time for this to be revisited.</p> <p>Thank you PCNZ for the substantial communication to the profession on the work you do, I only hope it is treated with the respect it deserves.</p> <p>Your sincerely Mark Bedford</p>
Kelsi Freer	<p>I feel there is no point submitting anything as you will go ahead and increase it to whatever you like regardless of the responses you get.</p> <p>It's the same every year. Compared with other similar professions that we earn far far less money than, our APC is much higher than all of them. It's ridiculous, and the time you spent putting pages and pages of emails together to try to justify yourselves doesn't help the costs.</p> <p>Maybe you should be combining with a similar body to share the workload of being a council like nursing or something and therefore the cost. The APC fee for pharmacists is unbelievable, but us submitting our opinions isn't going to change anything, which is a real shame for the profession.</p> <p>Thanks Kelsi</p>
Roseanne Lion-Cachet	<p>It's that time of the year again, where we find out once again, how much extra we will need to pay to be a pharmacist for the coming year. I do appreciate the amount of effort that has been put into explaining why and how this money is going to be spent, but the fundamental problem is that there is no end in sight. Every year we go through this fruitless exercise and land up in the same situation, but where to from here? Obviously, this model is broken and is no longer fit for purpose – there simply are not enough pharmacists to continue to foot the bill for all that is required by the government in terms of protecting the public. Something has to change! If the government is serious about public safety they have to start footing some of this bill.</p> <p>There is a sense of anger and intolerance which has developed during Covid which makes everyone extremely quick to complain about everything – some things are very important, and some just petty (expired repeats uncollected, being referred to the HDC!!) For goodness sake – is this a good use of anyone's time?</p> <p>We are all squeezed and the government have set a precedent about tightening their belts, slashing budgets and jobs. Pharmacy is one of the lowest paying professions yet are paying some of the highest fees. I earn way less</p>

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	<p>than a teacher, nurse or policeman at my stage of career and every year more pharmacists are choosing to reassess their options to either study or to work at all – yet we are expected to fill the gap presented by a lack of GP service, with our ‘free advice’! For a working Mum pharmacist who is just trying to keep involved, they have to pay out \$150 per month (fees, APC, society) before they even start to earn. It is just ludicrous! On top of this, owners are crying out for funding, large corporates are taking valuable revenue and the net result is to continue the pathetic wages which pharmacists are forced to accept.</p> <p>I expect this is a waste of time, but I would love the people employed by the Council to give some more forceful feedback to politicians to highlight the state of funding/expenses to the profession. WE NEED CHANGE! Regards, Rosanne Lion-Cachet</p>
David McKee	<p>Dear sir</p> <p>Re: Consultation Feedback on proposed 2025/26 APC fees</p> <p>I am writing to provide feedback on Council's proposal to increase APC fees for 2025/26.</p> <p>It is concerning that Council, yet again, wishes to increase registration fees especially when the financial burden on pharmacists remains at an all-time high.</p> <p>It is also concerning that Council has a track record of ignoring the majority of consultation feedback which is suggestive of a feeling of fait accompli on my part.</p> <p>Council is obviously aware that their proposal will be unpopular; I can't see any other reason for the unprecedented surge in communications regarding the fee proposal. The fact that Council has undertaken a justification based communication campaign indicates that this "proposal's" outcome has already been decided thus negating the need for "consultation." This looks very much like you are requesting consultation feedback only because you have to and not because you are actually interested in what the substance of the feedback actually is. But, nonetheless, I have the following remarks to make regarding Council's proposal to increase registration costs:</p> <ul style="list-style-type: none"> <li>* An increase to the fee substantially greater than inflation is hard to justify when Council's costs haven't increased proportionately.</li> <li>* The fee increase comes on the back of continual annual fee increases. If you are continually having to increase your fees then something is wrong. The alternative is that fees are being increased simply because you can and</li> </ul>

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	<p>there's no effective opposition to this. Nor are there any alternatives for the fee payers. This means that Council has no incentive to be efficient as it can simply increase fees whenever it wants.</p> <p>*International fee comparison with Australia shows that Council's proposal is not justified. Registration costs in NZ are substantially greater than that of Australia. This is a good comparison since both countries face similar regulatory challenges and professional standards. One would expect some differences due to economies of scale but the difference is stark. Australia has managed to keep this year's fee increase to a much more modest 4%.</p> <p>* Council's primary justification appears to be based on increased notifications to Council and an inability to enforce payment of fines/costs from prior disciplinary decisions. The data provided doesn't support Council's suggestion on increased notifications. Pharmacists should not be penalised by Council's inefficient collection processes. This is very indicative of a lack of efficiency within Council. Having spoken with several colleagues who have been involved with disciplinary proceedings there has been near universal agreement that the process has been very challenging for them. This is indicative of a broken system. The system should be fixed rather than trying to fund a broken system.</p> <p>* Council's desire to rectify a negative disciplinary reserve: this can only have occurred by poor management. Should pharmacists be held financially responsible for the burden of poor historical financial decisions? I think not. Council's desired timeframe for restoring the disciplinary reserve is unnecessarily aggressive considering New Zealand's current economic climate and the significantly challenging financial situation facing many pharmacists.</p> <p>* Council has provided the fee payers with no evidence that other funding streams or internal efficiencies have been investigated.</p> <p>Recommendations:</p> <ol style="list-style-type: none"> <li>1. 2025/26 fee increase at CPI level raise.</li> <li>2. Gradually implement reserve rebuild</li> <li>3. Investigate alternative revenue streams (as aggressively as you justify proposing to increase fees).</li> <li>4. Open your financial accounts to investigation by fee paying pharmacists so costs/efficiencies can be realistically assessed.</li> </ol> <p>Yours sincerely</p> <p>David McKee</p>
Anna Kyle	<p>Kia ora</p> <p>Thank you for the opportunity to give feedback on the proposed 2025 APC and disciplinary feedback.</p>

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	<p>Appreciate these are tough times for everyone.</p> <p>It would be good to have a pro rata fee for pharmacist APC fees to reflect time spent working- current fee discourages part time workers.</p> <p>It would be great if Pcy Council restarted negotiations to join other NZ registering organisations to relieve the acute financial strain / ongoing uncertainty that is put onto the few pharmacists registering (compared to larger organisations) and allow a larger funding pool for all council activities that may allow more financial certainty and resilience for the Council as well as a reassessment of the APC/disciplinary fee handed to registering pharmacists with annual increases.</p> <p>Could we compare annual registering fees against other registering organisations in NZ to compare our fees to other health providers?</p> <p>Thank you Kind regards Anna</p>
Helen Guy	<p>Dear Sir/Madam</p> <p>I write to oppose the proposed fee increase.</p> <p>The reason for this is that whilst a plethora of information has been provided justifying the increase on the basis that the Council's costs will increase in the coming year, this is to be imposed upon Pharmacists who have no means of increasing their income in order to meet this, at a time when most costs are rising across the board (insurances, mortgage payments, rent, rates etc).</p> <p>Pharmacists could ask their employers to increase their wages to cover all these, but the employers have no means to increase their income to cover this either (note that the recent funding package from the Ministry of Health was less than CPI).</p> <p>The fact is that there is a cost-of-living squeeze across the board, and individuals and businesses are having to work with the available options in order to stay afloat. For individuals this might mean trying to increase hours of</p>

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	<p>work or reduce discretionary spending. For businesses this might mean changing suppliers, reducing staff hours or delaying capital upgrades.</p> <p>For Pharmacists in New Zealand, the Pharmacy Council is a monopoly supplier. We can't look elsewhere for the services they provide. If there was another option, then the Council would have to ensure that they provided value for money in order to maintain their customer base, just like Pharmacies and employees do.</p> <p>As a consequence, there's no incentive for the Pharmacy Council to look hard at their spending and every incentive to build an empire and impose the increasing costs onto the captive audience.</p> <p>It is of note that the current government are working very hard to reduce unnecessary costs in order to address the current fiscal deficit. They are not demanding that the taxpayers pay more, they are aware that everyone is feeling the financial strain, and I imagine they would also like to be re-elected so are taking a balanced approach. As a taxpayer and Pharmacist I would like to see the Pharmacy Council follow suit.</p> <p>Yours faithfully Helen Guy</p> <p>cc. Dr Shane Reti, Minister of Health cc. Todd Stevenson, ACT spokesman for Health</p>