

CONSULTATION DOCUMENT

Registration of NZ pharmacists – proposed changes to the Recognised Equivalent and non-Recognised Equivalent Qualification Routes

Released: 17 March 2026

Submissions close: 5pm, Monday 20 April 2026

Purpose

Section 12 of the Health Practitioners Competence Assurance Act (2003) (the Act) requires the Pharmacy Council of New Zealand (Council) to prescribe the qualification(s) required for entry to any scope of practice. The above requirements are set out in the New Zealand (NZ) Gazette with the *Pharmacy Council Scopes of Practice and Prescribed Qualifications Amendments Notice 2014*¹.

Section 14(2) of the Act requires Council to consult on amendments to the notice.

This consultation seeks feedback prior to amendments being made to the *Pharmacy Council Scopes of Practice and Prescribed Qualifications Amendments Notice 2014* that sets out the scopes of practice and qualification requirements.

This consultation document seeks feedback on the following amendments:

- (1) Registration processes for the *non-Recognised Equivalent Qualification Route* (non-REQR pathway):
 - Pathway to be renamed the *Assessment Pathway*.
 - Removing reference to the Knowledge Assessment of Pharmaceutical Sciences (KAPS) examination (discontinued) and replacing it with the Overseas Pharmacist Readiness Assessment (OPRA) examination
 - A pass in a Pharmacy Council approved New Zealand Pharmacy Legislation course to be a prerequisite for registration in the Pharmacist Scope, not the Intern Scope.

- (2) Registration processes for the *Recognised Equivalent Qualification Route* (REQR pathway):
 - Pathway to be renamed the *Comparable Pathway*.

¹ <https://gazette.govt.nz/notice/id/2018-gs5696>
<https://gazette.govt.nz/notice/id/2014-gs6347>
<https://gazette.govt.nz/notice/id/2026-sl209>

- Broadening the eligibility for registration via the Comparable Pathway to include pharmacists registered in an approved country regardless of where they gained their pharmacy qualification – no additional training or “bridging examination” to be completed.
 - Removing the requirement for pharmacists on the Comparable pathway to pass the Competency Assessment for Overseas Pharmacists (CAOP) exam before registering with the Council.
- (3) Removing reference to registration of Australian pharmacists via the Trans-Tasman Mutual Recognition Act 1997 (TTMRA). Council is not required to notify a TTMRA pathway because these applications are processed under the TTMRA legislation, not the Act.
- (4) Description of prescribed qualifications for United Kingdom Pharmacist Prescribers to register as a NZ Pharmacist Prescriber.

The consultation also includes some minor corrections to the Gazette notice and editorial fixes to improve readability.

Feedback is welcome and will be carefully considered by Council before a final decision is made.

Feedback and submissions

Responses should be provided via [survey response](#).

If necessary, you can also email your response to consultations@pharmacycouncil.org.nz. We invite responses from members of the pharmacy profession, the public and other interested individuals and organisations.

Council will review and consider all responses received prior to making a final decision on the proposal outlined in this document. This consultation and a summary of the responses received will be published on Council’s website and will remain available to the public.

Please advise in your submission if you wish to remain anonymous.

About us

The Pharmacy Council is responsible for the regulation of pharmacists in New Zealand pursuant to the Health Practitioners Competence Assurance Act 2003 (the Act). We are responsible for ensuring pharmacists are competent and fit to practise in their profession, to keep the public safe.

There are currently three pathways to become a registered pharmacist in New Zealand:

- **The graduate pathway** for New Zealand and Australian graduates who initially register in the Intern Pharmacist Scope of Practice, with requirements to complete the Intern

Training Programme and pass Council's Assessment Centre examination prior to registration in the Pharmacist Scope of Practice.

- **The Recognised Equivalent Qualification Route (REQR) pathway** for pharmacists who gained their pharmacy qualification in the United Kingdom (UK), Ireland, United States of America (USA) or Canada. Once these pharmacists pass the Competency Assessment of Overseas Pharmacists (CAOP) examination they can apply to register in the Pharmacist Scope of Practice. Additional conditions are placed on their practice initially before they can move onto independent practice i.e., they must complete a period of supervised practice and pass Council's pharmacy law and ethics interview.
- **The non-Recognised Equivalent Qualification Route (non-REQR) pathway** for pharmacists qualified in countries other than New Zealand, Australia or the above listed REQR countries. These pharmacists must meet requirements which include approval following assessment of their qualification, registration status in own country and post registration experience (initial consideration/preliminary review), then passing the Overseas Pharmacist Readiness Assessment (OPRA) examination and the New Zealand Pharmacy Legislation Course. They can then register in the Intern Pharmacist Scope of Practice and need to complete the same requirements as NZ graduates (complete the Intern Training Programme and pass Council's Assessment Centre) prior to registration in the Pharmacist Scope of Practice.

Background

Council has been exploring opportunities to address pharmacy workforce shortages by streamlining registration pathways and reducing barriers for suitably trained overseas pharmacists who want to practise in NZ. The changes we are proposing, the reason(s) for these, and the resulting amendments to the current Gazette notice are described below.

Proposed changes to registration processes for the non-Recognised Equivalent Qualification Route (non-REQR) pathway

1. Non-REQR pathway to be renamed.

The non-REQR pathway will be renamed as the Assessment Pathway.

2. KAPS examination now OPRA.

The Australian Pharmacy Council (APC) has replaced the Knowledge Assessment for Overseas Pharmacist (KAPS) exam with the OPRA examination. The reference to this in the Gazette notice to KAPS needs to be replaced with OPRA.

3. Gazette notice change required.

The current Gazette notice does not differentiate between the prescribed qualifications for non-REQR pharmacists to enter the Intern Pharmacist Scope of Practice, and subsequent entry to the Pharmacist Scope of Practice. The amended Gazette notice lays out the prescribed qualifications for entering each scope separately so that this transition is clear.

4. Option to complete the NZ Pharmacy Legislation course while in the intern scope.

We want to make it faster for non-REQR pharmacists to register in the Intern Scope. Currently passing the NZ Pharmacy Legislation (NZPL) course is a pre-requisite for non-REQR pharmacists to register in the Intern Scope of Practice. The course is offered twice per year but there is only one point of entry to the Intern Training Programme (ITP). This can mean a delay in non-REQR pharmacists starting the ITP. For example, a non-REQR pharmacist who met the initial requirements by September 2025 and passed the OPRA exam in November 2025 would still need to enrol in NZPL in March 2026, meaning they could not start the ITP until January 2027. Under this new proposal these pharmacists would have the option of completing the course after registration in the Intern Scope, at the same time they are completing the ITP. Non-REQR pharmacists will still have the option of completing NZPL before they register in the ITP. Passing the NZPL examination will therefore become a prescribed qualification for registration in the Pharmacist Scope, not the Intern Scope. Non-REQR pharmacists will therefore not be eligible to attend the Assessment Centre unless they have met the requirements of the Intern Training Programme and passed the NZ Pharmacy Legislation examination.

Amended requirements

We therefore propose the following changes to the prescribed qualifications for pharmacists registering via the non-REQR pathway

Status quo (current Gazette)	Proposed changes
<p>Non-Recognised Equivalent Qualification Route (non-REQR pharmacists)</p> <p>Eligibility for non-REQR:</p> <p>2. Registration in the Pharmacist Scope of Practice</p> <p>(iv) Registered pharmacists applying from countries other than Australia or REQR countries:</p> <p>(a) Pharmacy degree and post-registration work experience in pharmacy deemed by the PCNZ as equivalent in content and learning outcomes to a current APC accredited pharmacy programme; and</p> <p>(b) current registration as a pharmacist with a pharmacy registration authority in the same country of registration where the degree in (iv)(a) was completed; and</p> <p>(c) Knowledge Assessment of Pharmaceutical Sciences (KAPS): successful completion of two examination papers covering pharmaceutical chemistry,</p>	<p>The route will be renamed the 'Assessment Pathway'.</p> <p>Amended eligibility:</p> <p>1. Prescribed Qualifications for Registration in the Intern Pharmacist Scope</p> <p>Pursuant to section 12 of the Act, the following qualifications are prescribed for registration in the Intern Pharmacist Scope of Practice:</p> <p>a. Assessment Pathway Pharmacists - overseas registered pharmacists who are currently registered in countries <u>other than</u> Australia or Comparable Pathway countries and who have:</p> <p>i. A pharmacy degree(s) deemed by Council as having sufficient content and learning outcomes to support safe and effective practice in New Zealand; and</p> <p>ii. Post-registration work experience as a pharmacist deemed by Council as sufficient to support safe and effective practice in New Zealand; and</p> <p>iii. Current registration as a pharmacist with a pharmacy registration authority</p>

<p>pharmacology, pharmaceuticals and therapeutics; and</p> <p>(d) a pass in the New Zealand Pharmacy Legislation course; and</p> <p>(e) successful completion of the Intern Training Programme of the Pharmaceutical Society of New Zealand (Inc); and</p> <p>(f) a pass in the PCNZ Assessment Centre.</p>	<p>in the same country they gained their original degree; and</p> <p>iv. Passed the Overseas Pharmacist Readiness Assessment (OPRA[®]) or other examination deemed equivalent by Council.</p> <p>2. Prescribed Qualifications for Registration in the Pharmacist Scope of Practice</p> <p>Pursuant to section 12 of the Act, the following qualifications are prescribed for registration in the pharmacist scope of practice, per the relevant pathway:</p> <p>a. Assessment Pathway Pharmacists who are registered in the Intern Pharmacist Scope of Practice; and who have</p> <ol style="list-style-type: none"> i. Met the requirements of an accredited Intern Training Programme; and ii. Passed the Council approved NZ Pharmacy Legislation course; and iii. Passed the Pharmacy Council Assessment Centre or other examination deemed equivalent by Council.
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Proposed changes to registration processes for the Recognised Equivalent Qualification Route (REQR pathway)

In the short-term we want to build on our international reputation and make it easier for pharmacists who are currently working in comparable health systems to work in NZ.

To do so we want to address the following barriers to skilled pharmacists seeking registration in NZ via the REQR pathway.

1. Recognised Equivalent Qualification Route (REQR) pathway to be renamed

The REQR pathway will be renamed as the Comparable Pathway.

2. Some restrictions of entry to REQR pathway removed

Eligibility to register is currently limited to pharmacists who qualified and are currently registered in a listed comparable country (currently the UK, Ireland, USA or Canada) OR pharmacists who have qualified in other countries but were able to register in the above comparable countries by completing an approved “conversion” programme. This effectively

excludes pharmacists who qualified in non-REQR countries and did not need to do a specified “conversion” programme to meet registration requirements for the REQR country. One example is pharmacists who trained in one of the European Union countries and then went on to register in the UK. Currently these pharmacists can only apply for NZ registration under the non-REQR pathway, even if they have worked in the UK for a significant period.

Tying eligibility for registration to where the qualification was obtained limits our pool and is not keeping pace with international developments, as more countries reduce the training and examination requirements for pharmacists entering their workforce who qualified elsewhere.

Council recognises the countries specifically listed under the REQR pathway as having trusted pharmacy regulators with robust registration processes. REQR pharmacists have also gained valuable experience in a health system similar to our own.

Council also wants to open the door to REQR pharmacists who have been previously registered in a listed comparable country, but whose registration is not current in that country. They may have worked for many years in the comparable country, gained the experience and skills necessary, but since moved to another country, taken break or other reason. Without current registration in the comparable country, they are not eligible to register in NZ under the current pathway requirements. With the proposed changes Council will still require a Certificate of Good Standing from the relevant authority for the period the pharmacist was registered to confirm eligibility/suitability for NZ registration.

3. Removing the requirement to pass the Competency Assessment of Overseas Pharmacists (CAOP) exam

This examination must be completed prior to applying for registration under the REQR pathway. The examination has a high pass rate, and Council does not consider this exam helps to manage risk. It is also considered a relatively expensive examination that is only offered three times per year, potentially imposing unreasonable cost and time barriers to some qualified pharmacists who want to work in NZ. Council is proposing to remove the requirement to pass the CAOP exam to be eligible to register under the REQR pathway.

Amended requirements

We therefore propose the following changes to the prescribed qualifications for pharmacists registering via the REQR pathway

Status quo (current Gazette)	Proposed changes
<p>Recognised Equivalent Qualification Route (REQR pharmacists)</p> <p>Eligibility for REQR:</p> <p>2. Registration in the Pharmacist Scope of Practice</p> <p>iii. recognised Equivalent Qualification Route (REQR) pharmacists</p>	<p>The route will be renamed the ‘Comparable Pathway’.</p> <p>Amended eligibility:</p> <p>Hold current or previous pharmacist registration with a pharmacy registration authority recognised by Council.</p> <p>Recognised authorities are those in which:</p>

<p>Holders of a pharmacy qualification from a country or jurisdiction recognised by the PCNZ (currently recognised countries are United Kingdom, Ireland, Canada and the United States of America):</p> <ul style="list-style-type: none"> - in which there is a legislative basis for registration/licensure of pharmacists; - in which the practice of pharmacy is considered by the PCNZ to be substantially equivalent to Australia/ New Zealand; - in which the level of competency required to practise pharmacy is considered to be substantially equivalent to Australia/New Zealand; and - which has accreditation of tertiary institutions offering pharmacy degrees as accredited by the APC, or which the pharmacy qualification is from an institution individually accredited by the APC. <ul style="list-style-type: none"> (a) successful completion of the Competency Assessment of Overseas Pharmacists (CAOP) examination; and (b) successful completion of a minimum period of four weeks' supervised practice under an approved pharmacist (three months for Canada and United States of America applicants); and (c) successful completion of the PCNZ Law and Ethics interview; and (d) successful completion of a PCNZ approved Return to the Workforce Programme (Canada and United States of America applicants only). 	<ul style="list-style-type: none"> • there is a legislative basis for registration / licensure of pharmacists, and • the practice of pharmacy is considered by Council to be substantially equivalent to New Zealand, and • the pharmacist competencies are considered by Council to be substantially equivalent to New Zealand, and • accreditation of tertiary institutions offering pharmacy degrees is to a standard deemed equivalent to NZ accreditation standards for pharmacy education providers.
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Additional requirements will remain in place (at policy level) but removed as “prescribed qualifications” as these required after registration is approved not for the purpose of eligibility to register.

Comparable Pathway pharmacists will still be required to meet the following requirements post-registration:

- (a) completion of a minimum period of supervised practice under an approved supervising pharmacist. The requirement remains four weeks (140 hours) for pharmacists from the UK and Ireland and three months (420 hours) for pharmacists from Canada and United States of America; and
- (b) successful completion of the Council's Law and Ethics interview; and
- (c) completion of a Council approved course to familiarise them with current NZ legislation, pharmacy practice and dispensing processes (pharmacists who were registered in Canada and the US only).

Under sec 19 (5) of the Act, Council must be satisfied that an applicant's ability to communicate in and comprehend English is sufficient to protect the health and safety of the public. While not specified in the Gazette notice as a "prescribed qualification", Council may require Comparable Pathways pharmacists who have not gained their pharmacy qualification and initial registration in the comparable country to provide evidence they meet the English language requirements.

Other policy changes being made to registration pathways

As identified in the [Advancing future pharmacy practices through regulation discussion document](#) we are making other short-term change to registration to support efforts addressing workforce pressure. This includes:

Removing unnecessary steps for some pharmacists returning to practice: Currently pharmacists returning to practice after 8 years or more years must complete the ITP and Assessment Centre. We are going to amend our policy to remove this requirement and replace it with proportionate supervision conditions and requirements to complete learning and upskilling such as a competency self-assessment, learning plan, Revisit the Workplace programme and the NZ Pharmacy Legislation course.

Draft gazette notice

We have drafted an amended gazette notice below with tracked changes to show what proposed changes will look like.

To replace:

<https://gazette.govt.nz/notice/id/2014-gs6347> - original notice of scopes and prescribed qualifications

<https://gazette.govt.nz/notice/id/2018-gs5696> - 2018 amendment to remove reference to written exam (read in conjunction with above)

<https://gazette.govt.nz/notice/id/2026-sl209> - 2026 amendment to include Waikato qualification (read in conjunction with above)

NEW Gazette notice

Pursuant to section 12(1) of the Health Practitioners Competence Assurance Act 2003 ("the Act"), the following notice is given.

Notice

Title and commencement

1. This notice may be cited as the Pharmacy Council Scopes of Practice and Prescribed Qualifications Amendment Notice 2026.
2. This notice comes into effect on XX 2026.
3. This notice revokes and replaces all previous Pharmacy Council of New Zealand Scopes of Practice and Prescribed Qualifications notices.

Explanatory note

Under section 11 of the Act the Pharmacy Council (Council) must specify scopes of practice. Under section 12 of the Act Council must prescribe qualification(s) (pre-registration qualification(s) or requirement(s)) needed to be eligible to register in each scope.

Council has three Scopes of practice:

1. Intern Pharmacist
2. Pharmacist
3. Pharmacist Prescriber

New Zealand (NZ) and Australian pharmacy graduates, and some overseas pharmacists, who wish to register as a NZ pharmacist, must first register in the Intern Pharmacist Scope and then work towards registration in the Pharmacist Scope.

Other overseas pharmacists may be eligible to register directly in the Pharmacist Scope without going through the Intern Scope.

The Intern Pharmacist and Pharmacist Scope cannot be held at the same time; however, the Pharmacist Scope and Pharmacist Prescriber Scope can be held concurrently.

Each scope has specified duties/tasks that fall within the scope and a set of prescribed qualifications for registration in that scope. These are laid out in detail below.

Intern Pharmacist Scope of Practice

The intern pharmacist, practising under the supervision of a practising registered pharmacist acts as a medicines manager, providing patient-centred medication therapy management, health improvement and disease prevention services in a collaborative environment. Intern pharmacists ensure safe and quality use of medicines and optimise health outcomes by contributing to patient assessment and to the selection, prescribing, monitoring and evaluation of medicine therapy.

The practice of pharmacy may include:

- the custody, preparation and dispensing of medicines and pharmaceutical products;
- the selection and provision of non-prescription medicine therapies and therapeutic aids;
- health promotion, including health screening;
- the potential for administration of medicines; and
- researching and evaluating information and providing evidence-based advice and recommendations on medicines and medicine-related health issues.

1. Prescribed Qualifications for Registration in the Intern Pharmacist Scope

Pursuant to section 12 of the Act, the following qualifications are prescribed for registration in the Intern Pharmacist Scope of Practice:

- a. New Zealand and Australian Pharmacy Graduates
 - i. Bachelor of Pharmacy, University of Auckland; or
 - ii. Bachelor of Pharmacy (Honours), University of Auckland; or
 - iii. Bachelor of Pharmacy, University of Otago; or
 - iv. Bachelor of Pharmacy (Honours), University of Otago; or
 - v. Master of Pharmacy Practice, University of Waikato; or
 - vi. Australian pharmacy degrees from Schools of Pharmacy holding either full or conditional accreditation from the Australian Pharmacy Council (APC).
- b. Assessment Pathway Pharmacists - overseas registered pharmacists who are currently registered in countries other than Australia or Comparable Pathway countries and who have:
 - i. A pharmacy degree(s) deemed by Council as having sufficient content and learning outcomes to support safe and effective practice in New Zealand; and
 - ii. Post-registration work experience as a pharmacist deemed by Council as sufficient to support safe and effective practice in New Zealand; and
 - iii. Current registration as a pharmacist with a pharmacy registration authority in the same country they gained their original degree; and
 - iv. Passed the Overseas Pharmacist Readiness Assessment (OPRA ©) or other examination deemed equivalent by Council.

Pharmacist Scope of Practice

The practice of pharmacy is necessarily broad and is wider than pharmacists working directly with patients, given that such roles influence clinical practice and public safety. In a clinical role, the pharmacist acts as a medicines manager, providing patient-centred medication therapy management, health improvement and disease prevention services, usually in a collaborative environment. Pharmacists ensure safe and quality use of medicines and optimise health outcomes by contributing to patient assessment and to the selection, prescribing, monitoring and evaluation of medicine therapy.

The practice of pharmacy may include, but is not limited to:

- the custody, preparation and dispensing of medicines and pharmaceutical products;
- the selection and provision of non-prescription medicine therapies and therapeutic aids;
- health promotion, including health screening;
- administration of medicines, including injectable medicines;
- researching and evaluating information and providing evidence-based advice and recommendations on medicines and medicine-related health issues;
- teaching and advising;
- policy development;
- management;
- manufacturing; and
- auditing.

2. Prescribed Qualifications for Registration in the Pharmacist Scope of Practice

Pursuant to section 12 of the Act, the following qualifications are prescribed for registration in the pharmacist scope of practice, per the relevant pathway:

- a. **New Zealand and Australian Pharmacy Graduates** registered in the Intern Pharmacist Scope of Practice; and who have
 - i. Met the requirements of an accredited Intern Training Programme; and
 - ii. Passed the Pharmacy Council Assessment Centre or other examination deemed equivalent by Council.

- b. **Assessment Pathway Pharmacists** who are registered in the Intern Pharmacist Scope of Practice; and who have
 - i. Met the requirements of an accredited Intern Training Programme; and
 - ii. Passed the Council approved NZ Pharmacy Legislation course; and
 - iii. Passed the Pharmacy Council Assessment Centre or other examination deemed equivalent by Council

- c. **Comparable Pathway Pharmacists**, who:
 - i. hold current or previous registration with a pharmacy registration authority recognised by Council.

Recognised authorities are those in which:

- there is a legislative basis for registration / licensure of pharmacists, and
- the practice of pharmacy is considered by Council to be substantially equivalent to New Zealand, and

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- the pharmacist competencies are considered by Council to be substantially equivalent to New Zealand, and
- accreditation of tertiary institutions offering pharmacy degrees is to a standard deemed equivalent to NZ accreditation standards for pharmacy education providers.

Pharmacist Prescriber Scope of Practice

Pharmacist Prescribers have specialised clinical, pharmacological and pharmaceutical knowledge, skills and understanding relevant to their area of prescribing practice. This allows them to provide individualised medicines management services, including the prescribing of medicines to patients across a range of healthcare settings and models. Pharmacist Prescribers work in a collaborative health team environment with other healthcare professionals and are not the primary diagnostician. They can write a prescription for a patient in their care to initiate or modify therapy (including discontinuation or maintenance of therapy originally initiated by another prescriber).

They can also provide a wide range of assessment and treatment interventions which includes but is not limited to:

- Ordering and interpreting investigation (including laboratory and related tests).
- Assessing and monitoring a patient's response to therapy.
- Providing education and advice to a patient on their medicine therapy.

The Pharmacist Prescriber must prescribe within the limits of their professional expertise and competence (both clinical and cultural) and ethical codes of practice. They are responsible and accountable for the care they provide.

3. Prescribed Qualifications for Registration in the Pharmacist Prescriber Scope of Practice

Pursuant to section 12 of the Act, the following qualifications are prescribed for registration in the pharmacist prescriber scope of practice:

- a. New Zealand graduates
 - i. Postgraduate Certificate in Clinical Pharmacy in Prescribing, University of Auckland; or
 - ii. Postgraduate Certificate in Pharmacist Prescribing, University of Otago.
- b. United Kingdom Pharmacists with independent prescribing annotation who:
 - i. Hold a practising certificate in the Pharmacist scope of practice in New Zealand; and
 - ii. Hold a prescribing qualification from the United Kingdom deemed by Council as having sufficient content and learning outcomes to be equivalent to the NZ PP qualification; and
 - iii. Have post-registration work experience as a prescriber deemed by Council as sufficient to support safe and effective practice as a PP in New Zealand.

Dated at Wellington this [xx 2026]

NYENYEZI SIAMEJA, Registrar, Pharmacy Council of New Zealand.