

Registration Pathways Consultation Feedback Response

This document provides an overview of the Pharmacy Council of New Zealand (Council) 2026 consultation on New Zealand registration pathways for pharmacists. It summarises the feedback received on proposed changes to the Recognised Equivalent Qualification Route (REQR), non-Recognised Equivalent Qualification Route (non-REQR) and Return to Practice pathways.

In summary, Council consulted on proposed changes to the registration pathways for New Zealand pharmacists, specifically amendments to the *Pharmacy Council Scopes of Practice and Prescribed Qualifications Amendments Notice 2014* (the Gazette notice). We sought feedback from members of the pharmacy profession, employers, professional bodies, regulators, and other interested stakeholders.

We acknowledge and thank everyone who took the time to make a submission. The feedback received was detailed, constructive, and reflected strong engagement with the regulatory framework underpinning pharmacist registration.

This document summarises the feedback received, Council's response, and our next steps.

Overview of the Consultation

The consultation sought feedback on the following proposed changes:

1. **Amendments to the non-Recognised Equivalent Qualification Route (non-REQR)**, including:
 - renaming the pathway the Assessment Pathway,
 - replacing reference to the discontinued Knowledge Assessment of Pharmaceutical Sciences (KAPS) examination with reference to the Overseas Pharmacist Readiness Assessment (OPRA) (which has superseded the KAPS examination), and
 - changing when the New Zealand Pharmacy Legislation (NZPL) course can be completed.
2. **Amendments to the Recognised Equivalent Qualification Route (REQR)**, including:
 - renaming the pathway the Comparable Pathway,
 - broadening eligibility based on registration in comparable jurisdictions, not place of initial pharmacy qualification, and
 - removing the requirement to pass the Competency Assessment of Overseas Pharmacists (CAOP) examination.

3. **Removal of references to Trans-Tasman Mutual Recognition Act 1997 (TTMRA)** in the Gazette notice.
4. Clarification of **prescribed qualifications for United Kingdom Pharmacist Prescribers** registering in New Zealand.
5. Removal of the requirement for some pharmacists **returning to practice after 8 or more years** to complete the Intern Training Programme (ITP) and Assessment Centre (AC), replacing this with more proportionate requirements.

Submissions Received

Submissions were received via:

- an online SurveyMonkey questionnaire, and
- written submissions (emails and organisational responses).

Respondents included:

- individual pharmacists and intern pharmacists (e.g., NZ trained, internationally qualified, currently undertaking pathways, supervising those in these pathways)
- professional organisations and employers,
- Other New Zealand health regulators.

Overall, **most respondents supported the intent and direction of the proposals**, particularly those intended to remove unnecessary delays and barriers while still maintaining public safety.

Key Submission Themes

1. Non-REQR (non-Comparable Pathway) proposals

Support

The feedback showed support for:

- renaming the non-REQR pathway to better reflect the requirements for applicants, but noting that the originally proposed term “Assessment Pathway” was not widely supported and that a clearer, more intuitive name would improve understanding,
- replacing references to the KAPS examination with OPRA, following the discontinuation of KAPS and replacement with OPRA by the Australian Pharmacy Council (APC),
- improving overall transparency of the pathway by providing separate references in the Gazette to make it clear that non-REQR pharmacists must register in the Intern Scope first before they can progress to registration in the Pharmacist Scope, once all requirements are met,

There was limited appetite from respondents for changing the New Zealand Pharmacy Legislation (NZPL) course from a pre-requisite for entry to the Intern Scope to a co-requisite requirement i.e. a requirement that could be completed within the internship. Most respondents supported retaining NZPL as a requirement prior to entering the Intern Scope of Practice.

As there was little agreement on options to fast-track the non-REQR pathway by allowing the NZ Pharmacy Legislation to be completed in the ITP or removing the requirement to complete the ITP, we will not make this change at this stage.

Concerns raised

Feedback highlighted several concerns, particularly in relation to the NZPL proposal and interpretation of the Gazette changes:

- concerns that removing NZPL as a pre-requisite for entry to the Intern Scope could result in overseas pharmacists commencing their internship without sufficient foundational knowledge of New Zealand legislation and regulatory requirements,
- concerns that completing NZPL alongside the Intern Training Programme (ITP) would create an additional burden, making it more difficult to manage alongside existing learning and practice requirements and increasing the risk of burnout,
- concern that the proposed restructuring of requirements in the Gazette could be interpreted as allowing applicants in this pathway to bypass the Intern Scope and enter directly into the Pharmacist Scope of Practice,
- a broader concern that overseas pharmacists may require a clear and structured introduction to New Zealand practice expectations before commencing supervised practice.

Council's response

Council acknowledges the feedback received and confirms the following decisions:

- **Pathway name:**

Council agrees that the term "Assessment Pathway" may cause confusion. The pathway will instead be renamed the Non-Comparable Pathway, aligning with the corresponding change to the Recognised Equivalent Route (to be renamed the Comparable Pathway) and improving overall clarity and consistency.

- **KAPS to OPRA transition:**

Council confirms that OPRA replaces KAPS as the relevant examination, following a review of the KAPS examination by the Australian Pharmacy Council (APC). APC has confirmed that OPRA is an updated examination with the same purpose, which is to assess whether candidates have the necessary foundational pharmacy knowledge that underpins the practice of pharmacy in Australia and New Zealand.

Compared to KAPS, OPRA has more focus on therapeutics and patient care, and reduced exam content relating to core pharmaceutical sciences such as chemistry (although these are still assessed). Council considers these changes to be reasonable and appropriate, as they reflect the evolution of pharmacy education and practice in NZ, including greater therapeutics content within contemporary New Zealand pharmacy curricula.

Council is satisfied that OPRA continues to assess the core knowledge expected of internationally qualified pharmacists, consistent with the intent of the previous KAPS examination, while being more aligned with current curriculum content. Council considers OPRA appropriate for its purposes and confirms this change will be made in the Gazette.

- **Gazette clarity changes:**

Council will proceed with amendments to the Gazette to clearly distinguish:

- the requirements for entry into the Intern Scope of Practice (for all relevant pathways), and
- the requirements for registration in the Pharmacist Scope of Practice (for all relevant pathways).

These changes are intended to improve clarity only. Council confirms that applicants in the Non-Comparable (previously non-REQR) Pathway must still enter the Intern Scope and complete all required training and assessment before being eligible to register in the Pharmacist Scope. The amendments do not introduce any new or alternative route to bypass the requirement to complete the ITP and pass the AC before registration in the pharmacist scope.

- **NZPL requirement:**

Consultation feedback suggested mixed support for this proposed change. While some respondents commented on the potential benefits, others highlighted their concerns about the potential negative impact on readiness for practice, workload, and other potential unintended consequences for learners and employers.

Council has therefore decided not to proceed with the proposal to move the NZPL course from a pre-requisite to a co-requisite requirement in the short-term.

Passing NZPL will therefore remain a pre-requisite requirement that must be met prior to registration in the Intern Scope of Practice, consistent with current practice.

Council notes the importance of continuing to ensure that the Non-Comparable Pathway is proportionate, efficient, and fit for purpose. While the NZPL proposal will not proceed at this time, Council will continue to explore alternative approaches and improvements that may help streamline the pathway while maintaining public safety and appropriate competence assurance.

2. REQR (Comparable Pathway) proposals

Support

Most respondents supported:

- renaming the pathway to reflect comparability of health systems rather than qualifications alone,
- recognising pharmacists' competence based on registration and regulated practice in comparable jurisdictions,
- removing the CAOP examination due to its limited risk-management value and significant time and cost burden.

There was strong support for aligning New Zealand's approach with contemporary international regulatory practice through removal of CAOP.

Concerns raised

Some submitters raised concerns about:

- broadening eligibility for the Comparable Pathway without evidence of minimum experience or recency of practice in the comparable country,
- pharmacists from non-Comparable pathway countries registering in the comparable country for only a short period and then immediately applying to register in New Zealand,
- reliance on registration history without sufficient transparency about how equivalence is assessed.

Several respondents advocated for clear criteria around:

- minimum time practising in a comparable jurisdiction,
- recency of practice,
- documentary evidence (such as Certificates of Good Standing).

Council response

Council acknowledges that:

- eligibility criteria for the Comparable Pathway must be robust, transparent and consistently applied,
- the Gazette appropriately specifies *who may be eligible to register*, while the detail of how equivalence, recency, and suitability are assessed sits within Council policy and operational frameworks.

Council confirms that:

- Certificates of Good Standing, practice history, scope of work, and recency will continue to be assessed,

- removal of CAOP does not remove current supervision, orientation, or post-registration requirements such as conditions for supervised practice and passing Council's Law and Ethics Interview,
- policy will continue to articulate safeguards to ensure public safety while supporting workforce entry.

Council will proceed with all proposed changes to the Comparable Pathway, and the Gazette will be amended accordingly.

Council anticipates that the pathway name change and removal of the CAOP examination can be operationalised shortly after the Gazette amendments take effect.

In response to feedback, the development of supporting policy to enable Council to broaden eligibility criteria will require work to ensure clarity, consistency, and appropriate safeguards. Once the Gazette amendments are complete, a further period will be required to finalise this aspect before full implementation.

Council will continue to keep stakeholders informed of progress, including confirmation of implementation timeframes and publication of updated policy and guidance.

3. Removal of TTMRA references

There was broad agreement that:

- references to the Trans-Tasman Mutual Recognition Act no longer need to appear in the Gazette notice,
- TTMRA applications are processed under separate legislation and including them in Council's prescribed qualifications framework in the Gazette, which relates to the Health Practitioners Competence Assurance Act (HPCA), is unnecessary.

This change was generally recognised as a technical and clarifying amendment.

Council response

Council confirms this proposal will be actioned and reiterates that removal of the reference of TTMRA in the Gazette will not change the fact this remains a valid registration pathway and there is no change at a fundamental policy and operational/process level.

4. Prescribed qualifications for UK Pharmacist Prescribers

Support

Most respondents agreed with:

- explicitly including UK pharmacist prescriber qualifications in the Gazette,
- recognising equivalent training and prescribing experience.

Feedback from other health regulators was supportive and noted alignment with approaches internationally with nursing profession in NZ considering making a similar change.

Clarifications sought

Some respondents requested assurances that:

- prescribing experience in the UK is sufficiently comparable,
- supervision and competence assurance for prescribing in New Zealand is clear.

Council response

Council confirms that:

- the Gazette sets out entry eligibility
- Pharmacist Prescriber-specific supervision, scope limitations, and competence assurance will continue to be managed through policy and conditions on practice
- UK applicants must demonstrate both an equivalent qualification and relevant and recent prescribing experience before being authorised to prescribe in NZ.

Council confirms this proposal will be actioned in the Gazette and relevant policy and operational processes will be updated accordingly in due course.

5. Return to practice (RTP) after 8 or more years

Support

This proposal attracted strong and widespread support.

Respondents consistently described the current requirements as:

- disproportionate,
- discouraging experienced pharmacists from returning,
- particularly challenging for those who have taken career breaks for parenting / caregiving or worked in adjacent health roles.

Many described themselves as willing to return to pharmacist practice under a more targeted, supervised, and proportionate framework.

Concerns raised

A small number of respondents cautioned that:

- some form of structured assessment or supervision remains essential,
- competence assurance should be tailored to the length of absence and nature of prior practice.

Feedback from employers and professional organisations also highlighted concern that removing the ITP and AC for this group of pharmacists shifts greater responsibility onto workplace supervisors to assess competence, particularly without structured external assessment points. Some respondents considered that this could place increased burden on employers and supervising pharmacists and require them to make more complex judgements about readiness for practice. We note that supervisors (preceptors) currently have considerable assessment and supervision requirements (at least one year) while these RTP pharmacists complete the ITP.

Council response

Council confirms that:

- the intent is not to remove safeguards, but to replace a one-size-fits-all approach with risk-based, proportionate requirements,
- RTP pharmacists will continue to be subject to supervision, workplace-based assessment, and upskilling requirements as appropriate,
- the Return to Practice policy will appropriately outline eligibility and proportionate and flexible requirements appropriate for the individual practitioner's unique circumstances,
- we acknowledge the concerns raised by employers and professional organisations regarding the potential shift in supervisory responsibility. Council recognises that these concerns arise from removing structured external assessment points such as the ITP and Assessment Centre. Council will consider, within policy development, what appropriate assessment tools, guidance, and supporting information can be put in place to assist supervisors and employers to meet their responsibilities and make informed, consistent decisions about competence and readiness for practice.

This is a policy change that requires further development of operational processes, as well as supporting tools and guidance and Council anticipates that implementation will require additional time. Further information on the approach and timing of implementation will be provided later in the year.

Final Decision and Next Steps

Council has carefully considered all feedback received. Overall, submissions supported the direction of the proposals, particularly where they improved clarity, reduced unnecessary barriers, and maintained appropriate safeguards for public safety.

Final decisions

- **Non-Comparable Pathway (formerly non-REQR):**
 - The pathway will be renamed the non-Comparable Pathway.
 - Amendments to the Gazette will proceed to clearly distinguish between the requirements for entry to the Intern Scope and those required for registration in the Pharmacist Scope.
 - The proposal to move the New Zealand Pharmacy Legislation (NZPL) course from a pre-requisite (i.e. to be completed prior to registration in the Intern Scope) to a co-requisite requirement (i.e. to be completed prior to registration in the Pharmacist Scope) **will not proceed**. NZPL will remain a pre-requisite for entry to the Intern Scope for overseas registered pharmacists pursuing registration via this pathway.
 - References to the KAPS examination will be updated to OPRA.
- **Comparable Pathway (formerly REQR):**
 - The pathway will be renamed the Comparable Pathway.
 - Eligibility will be broadened to reflect registration and practice in comparable jurisdictions as well as qualifications.
 - The requirement to pass the CAOP examination prior to making an application to register via the Comparable Pathway will be removed.
 - Supporting policy will be developed to provide clear criteria and safeguards relating to eligibility for the pathway, including qualifications, registration, length and recency of practice, currency of registration etc.
- **Removal of TTMRA references:**
 - References to the Trans-Tasman Mutual Recognition Act 1997 will be removed from the Gazette as a technical clarification.
- **UK Pharmacist Prescribers:**
 - Prescribed qualifications for UK pharmacist prescribers will be explicitly included in the Gazette.
- **Return to Practice (8+ years):**
 - This is not a prescribed qualification so proposed changes do not need to be included in the Gazette.
 - The current requirements will be replaced with a more proportionate, risk-based approach. Detailed requirements will be set out in updated Return to Practice policy.

Implementation and next steps

Council will implement the confirmed changes in stages:

- Amendments to the Gazette, including pathway name changes, replacement of references to KAPS with OPRA, removal of CAOP, and clarification of pathway entry requirements, are expected to be progressed shortly, subject to final drafting and Gazette Office approval processes.
- Changes that rely on Gazette amendments, such as the KAPS to OPRA change and CAOP removal, will be implemented into operational processes after these amendments take effect.
- Further work is required to develop supporting policy, operational processes, and supporting tools and guidance for the broadened eligibility criteria under the Comparable Pathway, and for the updated Return to Practice requirements before these can be fully implemented.
- Further information on implementation will be provided later in the year.
- Council will continue inform stakeholders as changes are finalised.

Consultation Documents

Consultation document: Registration of NZ pharmacists – proposed changes to the Recognised Equivalent and non-Recognised Equivalent Qualification Routes (March 2026)

Draft amended Gazette notice (included in the consultation)