

CONSULTATION DOCUMENT

2027/28 FEES AND LEVIES CONSULTATION

Proposal for changes to:

- Annual practising certificate fee for pharmacists, pharmacist prescribers and intern pharmacists
- Disciplinary levy for pharmacists, pharmacist prescribers and intern pharmacists
- Other fees (registration, competence and other miscellaneous fees)

Issued: Monday 12 October 2026

Submissions close: 5pm, Monday 23 November 2026

Executive summary

The Pharmacy Council (the Council) is opening consultation on the 2027/2028 Annual Practising Certificate (APC) fees, disciplinary levy and other fees to seek your views on the proposed changes.

Background

There are two parts to the total annual practising fee paid by practitioners: the APC fee, and the disciplinary levy.

Council uses the revenue or funds from these fees to deliver the legal functions as described in the Health Practitioners Competence Assurance Act 2003 (the HPCAA) and any associated development to ensure the way we deliver the legal functions are fit for purpose.

The last fee change took effect on 1 April 2025. When setting the fees for the next financial year, Council must estimate future costs and activities.

Proposed changes

This year, we are proposing to increase both the disciplinary levy and the APC fee.

We are also proposing changes to some specific fees, a cost of living¹ uplift to all other miscellaneous fees, and changing how we charge for the cost of banking system payments.

This would mean the **total fees payable** (incl. GST) for the 2027/28 APC renewal period would be:

- \$1,080 for Pharmacists (currently \$1,020)
- \$1,170 for Pharmacist Prescribers (currently \$1,120)
- \$751 for Interns (currently \$669)
- \$110 for the non-practising fee (currently \$105)

You can find more detail about all these changes, and the method used to determine the total fee required to meet the required expenditure, in the consultation document.

Preparing for future costs

For the APC fee for the 2027/2028 financial year, we are proposing:

- a cost of living increase of 3.41% to the base 2026/2027 APC fee for all scopes of practice

For the disciplinary levy for the 2027/28 financial year, we are proposing:

- an increase of \$58 for forecasted cost increases in 2027/28 for all scopes of practice

¹ The cumulative effect of inflation from March 2025 to June 2026 is approximately 4.62% to maintain the same real value as of the June 2026 quarter.

Addressing reserve balances

Council currently manages two reserves: a General reserve and a Disciplinary reserve. In setting these fees and levies the Council must forecast its expenditure up to eighteen months in advance.

Some years, aspects of the Council's workplan needs to be deferred or reprioritised due to environmental factors. Some work may also be completed for less (or more) than was originally planned and budgeted.

In the case of disciplinary matters, it is difficult to forecast the volume and complexity of complaints and notifications we may receive.

For this reason, this year Council is proposing to:

- return the excess of General reserve held of \$116 for pharmacists and \$131 for pharmacist prescribers renewing their APC in 2027, and,
- levy a further \$78 to return the Disciplinary reserve to its policy minimum.

Balancing the books fairly

To make this process as administratively cost effective as possible, rather than issuing a separate adjustment and then charging a higher total APC, we are including these changes within the usual fee-setting method for 2027/28. This is possible because the receiver and payer are largely one in the same.

We want to make sure that what you pay is close to the actual costs Council incurs.

We also want to be transparent about how we use the fees and levies we receive from practitioners, how we determined the need for this change, and why we are doing it in one year rather than as a gradual increase. You can find all this information in the following sections.

In future, it would be reasonable for you to expect that at a minimum Council will need to change fees and levies to meet cost of living increases each year.

Proposed changes to other fees

We are also proposing changes to other fees to more accurately reflect the time and costs involved processing these functions. These proposed changes include:

- The application fee for initial consideration of registration for non-Comparable Pathway applicants will increase from \$950 to \$1,015
- The application fee for registration in the Pharmacist Prescriber scope of practice will increase from \$105 to \$470 for New Zealand trained applicants*
- The application fee for registration in the Pharmacist Prescriber scope of practice will decrease from \$2,395 to \$470 for overseas trained applicants*
- The reinstatement fee for the Intern scope of practice will increase from \$829 to \$997
- An increase of around 3.41% for cost of living (rounded up/down to the nearest dollar) for all other miscellaneous fees

** Note: these changes are interim changes only to the application fee for registration while work is being completed on the prescriber scope of practice*

Proposed changes to payment surcharges

Finally, we are proposing a change to the method for applying the recovery of banking system payment surcharges.

Currently, just over half of practitioners pay their APC fees via credit card and are charged an additional 2% fee, and the remainder pay via the Account-to-Account (A2A) bank transfer method with variable transaction rates applied that the Council absorbs due to the complexity of the provider's volume billing method.

To make this more equitable for all practitioners, we are proposing to apply a flat 1.3% banking system payment surcharge across all fee types. GST will not be applied to this.

Timing and things to note

- The proposed fees and levy for Pharmacists and Pharmacist Prescribers would apply from 1 April 2027.
- The proposed fees and levy for Interns would apply from 15 December 2027.
- Other miscellaneous fees would apply from 1 April 2027.
- All figures in the consultation document include GST, unless otherwise stated.
- The Council will give effect to the fees and levies by placing a notice in the [New Zealand Gazette](#).

Feedback and submissions

Council invites feedback on this consultation document from its stakeholders including practitioners, relevant professional associations and societies, the Ministry of Health, and any other sector organisations with an interest. The consultation document is available on Council's website for feedback from any interested public parties.

Council will consider all submissions and feedback received prior to making the final decision on the proposals outlined in this document.

Submissions received will be published on Council's website and will remain available for public view (personal details will be removed from submissions). Council reserves the right not to publish any submissions considered to be derogatory or inflammatory.

As this is a public consultation, information provided 'in confidence' will only be accepted under special circumstances. Please contact us before submitting any such material.

You can email your feedback to consultations@pharmacycouncil.org.nz or respond via our [online survey](#). **Submissions close at 5pm, Monday 23 November 2026.**

Ngā mihi
Michael A Pead
Chief Executive

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Consultation for the 2027/2028 APC fee and disciplinary levy

The Pharmacy Council | Te Pou Whakamana Kaimatū o Aotearoa (the Council) regulates the profession of pharmacy in New Zealand in accordance with the Health Practitioners Competence Assurance Act 2003 (the HPCAA). Council sets scopes of practice, qualifications and professional standards and manages registration, recertification, notifications and complaints. To deliver these functions we are required to set fees and levies, and this process requires a formal consultation with stakeholders.

The Pharmacy Council is consulting on:

1. Proposed Annual Practising Certificate (APC) fee and disciplinary levy for
 - pharmacists and pharmacist prescribers for the practising year 1 April 2027 to 31 March 2028; and,
 - intern pharmacists for the practising year 15 December 2027 to 14 December 2028
2. Fees for
 - initial consideration of non-Comparable Pathway applications
 - application to register into the Pharmacist Prescriber scope of practice
 - reinstatement in the Intern scope of practice
3. Other miscellaneous fees effective from 1 April 2027
4. Changes to the recovery of banking system payment processing charges effective from 1 April 2027.

Proposed fees and levies

1. The 2027/28 APC fee and disciplinary levy, including GST, are as follows:

Fees	2026/27 Actual fees and levy	2027/28 Proposed fees and levy	Base Increase	Increase	Payment Processing Charge (1.3%)	Total fees and levy payable	Overall Increase
	\$	\$	\$		\$	\$	
Pharmacist	1,020	1,066	46	4.5%	14	1,080	5.9%
Pharmacist Prescriber	1,120	1,155	35	3.1%	15	1,170	4.5%
Intern	669	742	73	10.9%	10	751	12.3%

Further details of the proposed changes can be found in Appendix 1.

2. Changes to other fees as follows:

Other fees	2026/27 Actual fees	2027/28 Proposed fees	Base Increase	Payment Processing Charge (1.3%)	Total fees payable
	\$	\$	\$	\$	\$
Intern reinstatement and issue of APC if over two years	829	997	168	13	1,010
Application for initial consideration of registration for non-Comparable Pathway applicants	950	1015	65	13	1,028
Application for registration – Pharmacist Prescriber ²	105	470	365	6	476
Application for registration – Overseas Pharmacist Prescriber	2,395	470	(1,925)	6	476

3. A standard 3.41% CPI uplift³ to all other fees payable

4. Application of a 1.3% payment processing charge across all fee types

² Interim fee pending the outcome of decisions on the pharmacist prescriber scope of practice.

³ [Survey of expectations \(M14\) - Reserve Bank of New Zealand - Te Pūtea Matua](#).

Background

The Pharmacy Council | Te Pou Whakamana Kaimatū o Aotearoa (the Council) sets Annual Practising Certificate (APC) and other fees for pharmacists under sections 130 of the HPCAA.

The Council sets disciplinary levies for pharmacists under section 131 of the HPCAA.

Together the fees and levies collected enable Council to deliver the fourteen functions of the Council as contained in section 118 of the HPCAA.

The Pharmacy Council's funding requirements are driven by its legal obligations, regulatory workload, and the costs of maintaining a safe, effective and credible system of professional self-regulation.

We acknowledge the significant financial pressures faced by the pharmacy sector and individual pharmacists and have worked hard to ensure the increases proposed in this consultation document are as fair and effective as possible.

Council's regulatory functions are funded separately from the delivery of core health services in New Zealand. When setting fees and levies, Council must consider the cost of undertaking its statutory responsibilities, its planned work programme, and the need to maintain appropriate reserve balances to ensure the ongoing delivery of those functions.

Best practice guidance is for the Council to consult when proposing changes to its fees or levies. The level of fees and levies is directly influenced by the regulatory functions the Council must undertake, the work planned for the coming year, and the resources required to deliver those activities.

This consultation provides an opportunity for interested parties to comment on the proposed fees and levies, the work they are intended to fund, and any other feedback for the Council to consider before making its final decision.

Council's gazetted fees and levies are considered secondary legislation under the HPCAA and as such are subject to regular scrutiny by Parliament's Regulations Review Committee (the RRC). The transparency of Council's rationale for change is a critical element in ensuring that any changes to its legislation (i.e., proposed fees and levies) meet the committee's strict criteria for its acceptance.

How the Council sets fees and levies

Fees and levies must generate enough monies each year to fund the work the Council is required to perform under the HPCAA.

When setting fees and levies, the Council:

- Forecasts the cost of delivering its regulatory functions and strategic work programme for the coming year
- Estimates the income that will be received from fees and levies
- Reviews and forecasts the starting and closing balance of its General and Disciplinary reserves

- Changes fees and levies where necessary to ensure costs can be met and reserve balances remain at the prudent policy levels

Council follows the Audit Office cost-recovery principles⁴, with practitioners paying enough to fund services across a one-to-two-year period but no more than is reasonably necessary.

How the Council manages excess or insufficient reserves

The Council reviews its financial position each year and prepares a budget for the following year. We hold separate reserves for operational (general) and disciplinary matters. Reserves enable us to deal with unexpected or unplanned events, such as material rises in the volume and costs of disciplinary matters or a change in legislation.

At the end of the financial year, if a reserve is forecast to contain more funds than are required, Council may choose to return some of those excess reserves. If a reserve falls below Council's target level, Council may increase the relevant fee or levy to restore the reserve.

Under the HPCAA, the APC fee and disciplinary levy fund different activities and are managed separately, although the practitioners for both purposes are essentially one and the same. Cross-subsidisation of these separate activities should be avoided.

What this means for 2027/28

The proposals for 2027/28 reflect two different situations.

APC fees

Some developmental work funded through APC fees in recent years was not completed as originally planned, and was either deferred, reprioritised, or completed under budget. Consistent with cost-recovery principles, Council is proposing a partial return of excess General reserve. This offsets the cost-of-living increase proposed for 2027/28 and is shown in greater detail in Appendix 1.

Disciplinary levy

The disciplinary levy is increasing because costs are forecast to increase because of growing complaint volumes, more complex investigations, higher legal costs, and limited recovery of costs through disciplinary processes.

The proposed disciplinary levy increase is intended to:

- Fund the forecasted 25% increase in the cost of disciplinary activity in 2027/28; and,
- Bring the Disciplinary reserve back to Council's minimum policy reserve level of approximately \$200,000.

The APC change largely offsets the significant disciplinary levy increase but still means a net total increase in the combined APC and levy fee.

⁴ [Setting and administering fees and levies for cost recovery: Good practice guide — The Audit Office](#)

Council's priorities for 2026/27 and 2027/28

The Council's regulatory priorities under the [HPCAA](#) (as per section 118) are to:

1. prescribe the qualifications required for scopes of practice within the profession, and, for that purpose, to accredit and monitor educational institutions and degrees, courses of studies, or programmes:
2. authorise the registration of health practitioners under this Act, and to maintain registers:
3. consider applications for annual practising certificates:
4. review and promote the competence of health practitioners:
5. recognise, accredit, and set programmes to ensure the ongoing competence of health practitioners:
6. receive information from any person about the practice, conduct, or competence of health practitioners and, if it is appropriate to do so, act on that information:
7. notify employers, the Accident Compensation Corporation, the Director-General of Health, and the Health and Disability Commissioner that the practice of a health practitioner may pose a risk of harm to the public:
8. consider the cases of health practitioners who may be unable to perform the functions required for the practice of the profession:
9. set standards of clinical competence, cultural competence (including competencies that will enable effective and respectful interaction with Māori), and ethical conduct to be observed by health practitioners of the profession:
10. liaise with other authorities appointed under this Act about matters of common interest:
11. promote and facilitate inter-disciplinary collaboration and co-operation in the delivery of health services:
12. promote education and training in the profession:
13. promote public awareness of the responsibilities of the authority:
14. exercise and perform any other functions, powers, and duties that are conferred or imposed on it by or under this Act or any other enactment.

Strategic development workplan for 2026/27

In addition to this 'business as usual' work, our strategic development workplan for 2026/27 (funded from the 2026/27 APC fee), is focussed on the following priorities:

s118 function(s)	Project / Development
Registration	Phase 1 - Implementation of non-Comparable Pathways changes
Registration Qualifications	Phase 1 - Pharmacist Prescribing
Recertification	MyRecert Post Implementation Review
Competence Assurance	Phase 1 - Review of Assessment Centre and Intern model & review of overall assessment blueprint

Compliance & Discipline Capability & Capacity	Phase 1 - Compliance Management System (CMS) functionality review and definition of future requirements
Capability & Capacity	Phase 1 – Business Intelligence
Capability & Capacity	Phase 1 - Pharmacy Sector Leadership Forum – early regulatory development requirements
Capability & Capacity	HPCAA Performance review

Strategic development workplan for 2027/28

Council's proposed 2027/28 strategic development work will focus on the following priorities

s118 function(s)	Deliverable
Registration	Phase 2 - Implementation of non-Comparable Pathways changes
Registration Qualifications	Phase 2 - Pharmacist Prescribing
Competence Assurance	Phase 2 - Review of Assessment Centre and Intern model & review of overall assessment blueprint
Compliance & Discipline Capability & Capacity	Phase 2 - Compliance Management System (CMS) functionality review and definition of future requirements
Capability & Capacity	Phase 2 – Business Intelligence
Capability & Capacity	Phase 2 - Pharmacy Sector Leadership Forum – early regulatory development requirements

Part 1 – Annual Practising Certificate fee

The Pharmacy Council is seeking feedback on the proposal to set the Annual Practising Certificate fee for 2027/28 per the schedule of scopes below.

Why is this increase necessary?

The Council is committed to ensuring that it remains financially viable and can fully deliver its regulatory functions and responsibilities under s118 of the HPCAA. For this reason, a cost-of-living uplift of 3.41%⁵ is proposed so we can continue to meet ongoing operational costs.

For recent APC years some of the Council's development workplan could not be fully completed either because of changes in priorities or resource limitations, or it was completed under budget. Under The Audit Office principles of cost recovery (equity, efficiency, justifiability, and transparency) it is appropriate that a portion of excess reserves be returned to practitioners.

For the 2027/28 APC year Council is therefore proposing that a two-part change be made to the APC fee for recertifying pharmacists and pharmacist prescribers.

Note: Pharmacists and pharmacist prescribers who did not hold a 2026/2027 APC and plan to return to practice during the 2027/28 APC year will be required to pay the full calculated APC fee excluding the return of reserve portion.

For the intern scope of practice, interns who join in the next financial year have not previously paid into the General reserve and are therefore not eligible for the return of reserves. The cohort of 2026 graduates who will enter the Intern scope of practice will enter at the currently gazetted Intern rate as of December 2026 and will pay a pro-rated Pharmacist APC fee to 31 March 2028 upon their successful completion of the November 2027 Assessment Centre.

Proposed 2027/28 APC fee calculation (rounded)	Renewing Pharmacist	Return to Practice Pharmacist	Renewing Pharmacist Prescriber	Return to Practice Pharmacist Prescriber	Intern
Base 2026/27 APC fee	\$787	\$787	\$888	\$888	\$436
Plus: 3.41% CPI increase for 2027/28	\$27	\$27	\$30	\$30	\$15
Less: Return of excess General reserve	(\$116)	Nil	(\$131)	Nil	Nil
Net APC fee payable (incl. GST)	\$698	\$814	\$787	\$918	\$451

⁵ [Survey of expectations \(M14\) - Reserve Bank of New Zealand - Te Pūtea Matua](#)

Part 2 – Disciplinary levy

The Pharmacy Council is seeking feedback on increasing the disciplinary levy for 2027/28 from \$232.50 to \$368.

Why is this increase necessary?

Over recent years, Council has consistently signalled a convergence of pressures on the profession:

- Rising complaint volumes and complexity
- Escalating legal and investigation costs
- Persistent under-recovery of disciplinary costs awarded to Council from cases heard by the Health Practitioner Disciplinary Tribunal (HPDT)

These pressures are not new. What has changed is the rate and concentration of impact across both 2025/26 and the 2026/27 year to date.

Historically, the Council had used the General reserve to help smooth short-term disciplinary funding pressures and avoid even more significant increases in the disciplinary levy. While both reserves are in essence funded by the same practitioners, the Council considers (following engagement with the Regulations Review Committee) that a more transparent approach going forward is for each reserve to be funded according to its own costs and requirements.

Where actual costs differ from those forecasted, Council will seek to address those differences either through return of excess reserves, or increases as appropriate, rather than relying on smoothing via the General reserve.

The Council is managing a continuing increase in the volume of Professional Conduct Committee (PCC) investigations, accompanied by:

- Increased referral rates to the HPDT processes
- Greater case complexity
- Greater reliance on external legal expertise, with associated cost increases
- Extended case durations

This has resulted in sharp, unplanned cost escalation within a relatively short timeframe.

A structural shift, not a one-off anomaly

While the immediate trigger is an increase in PCC-related activity, the underlying drivers reflect a longer-term structural shift:

- The New Zealand health system is operating under sustained pressure, contributing to increased complaints and scrutiny across all health professions
- Growing expectations of regulatory rigour, documentation, and procedural fairness

- Complex cases increasingly involve intersecting issues, such as competence, conduct, and health, which are extending timelines and increasing cost

Historically, disciplinary costs have exhibited high volatility rather than predictability, with a small number of complex cases capable of materially affecting annual expenditure. For example, two cases currently in progress have estimated HPDT prosecution costs at more than \$100,000 each.

The Council is increasingly encountering practitioners who are less willing or able to engage with us and address concerns early in the disciplinary process. Combined with more frequent legal challenges and disputes, this behaviour results in longer investigation times, additional legal input, more committee and secretariat time, and therefore significantly higher disciplinary costs.

Recovering costs

Although the Pharmacy Council funds this process through the levy collection, the entire investigation and any charges a professional conduct committee lays before the HPDT remain independent of Council.

We have no legislative power to recover disciplinary costs other than those awarded by a Tribunal outcome.

Recent data indicates true recovery rates of anywhere from 3 to 20% of costs incurred. Often, and to ensure we do recover monies, this may only be achieved after a prolonged period of instalment payments rather than in full satisfaction upon the issue of the HPDT decision and Council's invoice.

For a profession operating under a system of self-regulation, this means that the disciplinary levy must be sufficient year on year to manage the resulting financial risk.

Emerging risk: loss of financial resilience

Council's stated reserves policy is to be able to maintain a Disciplinary reserve of \$200k to provide resilience against volume and cost volatility.

However, the reserve (as at each financial year's balance date) has progressively depleted over recent years. It is currently in deficit, and for the financial year ending 2025/26 has only just begun to edge back towards the desired reserve minimum.

The Council has recently noted a legislative interpretation challenge by the RRC which means the speed of this corrective process has become an issue. There is a risk in continued reliance on a temporary cross-subsidisation (or smoothing) from the General reserve towards the end of each financial year.

Therefore, Council's view is that there is no alternative other than to put a "stick in the sand" and fully address the matter of the Disciplinary reserve minimum in the 2027/28 financial year, and annually thereafter.

Ongoing spikes in the cost of disciplinary matters without increases to the base levy also increases the risk of Council needing to apply separate levy collections during the year.

The Disciplinary reserve:

- Can decline rapidly during periods of high activity
- Cannot be temporarily subsidised by the General reserve, as this reduces overall organisational resilience and is contrary to the legislative intent of sections 130 and 131 of the HPCAA requiring that fees and levies collected be managed independently of each other.

Our aim is to administer the Disciplinary reserve as effectively as possible, and by increasing the levy now we hope to avoid additional one-off levy increases during the year.

Proposed increase

The Council proposes to increase the disciplinary levy for 2027/28 from \$232.50 to \$368.00.

The increase of \$135.50 is made up of:

- \$57.70 – a 25% increase for the forecast increased costs in 2027/28 due to a combination of higher volumes, more complexity and higher costs, and,
- \$77.80 – funding required to take the Disciplinary reserve back to the minimum policy level.

Fairness and impact considerations

The Council is acutely aware that this proposal comes at a time when the pharmacy sector is experiencing ongoing pressure on its core funding models, workforce shortages and workload intensity, and increasing patient complexity and demand.

However, several important considerations apply:

- The cost of self-regulation of the profession does not scale with individual practitioner income or business conditions
- The management and delivery of disciplinary processes must be borne by the wider profession, not attributable to individual practitioners
- Maintaining a credible regulatory system underpins public trust and professional autonomy

The proposed increase represents a response intended to balance these competing factors as proportionately as possible.

Alternatives considered (and why they are not preferred)

1. Absorbing the increase in compliance costs within the existing reserve

This is not sustainable, as the Disciplinary reserve is below optimal levels, and continued underfunding could increase the risk to practitioners of significant disciplinary levy increases during the year.

2. Reducing the management of disciplinary activity or scope

This is not appropriate as it would compromise Council's statutory obligations and may negatively impact public safety.

3. Cross-subsidisation from the General reserve

The short-term use of the General reserve / APC fees income to bolster the Disciplinary reserve is contrary to the intent of the HPCAA legislation, undermines transparency and distorts cost allocation per the latest RRC guidance.

What does this signal for the future?

The proposal to increase the disciplinary levy should be understood in context:

- It is not an isolated event, but part of meeting the forecasted annual costs which are continuing to rise
- It signals the need for more resilient reserve settings and funding mechanisms

Looking ahead, Council will continue to:

- Actively monitor trends in notifications and case complexity
- Refine financial forecasting for disciplinary activity
- Consider whether current funding models appropriately reflect risk and volatility
- Engage with the profession on longer-term approaches to fee stability

Compliance and disciplinary caseload

Total matters managed by type	2026/27 (Q1. 2027 only)	2025/26	2024/25	2023/24
New informal enquiries	32	134	130	182
New complaints and notifications	38	112	65	33
Matters remaining open from prior periods	134	69	44	41
Total	204	315	239	256

Complaints and notifications have increased 72% year-on-year. We have already received 38 new complaints and notifications in the first quarter of 2026/27, which is more than the total number of complaints and notifications received for the whole of 2023/24.

Investigations and hearings (PCC / HPDT)

	2026/27 (Q1.2027)	2025/26	2024/25	2023/24
Open from prior year	16	11	8	4
Plus: New cases opened	4	12	9	10
Less: Cases closed	3	7	6	6
Open at period end	17	16	11	8
PCC case closure rate	15%	30%	35%	43%
Cases referred to HPDT	1	4	2	3
HPDT referral rate	33%	57%	33%	50%

HPDT Costs & Recoveries \$'000s	2026/27 (Q1.2027)	2025/26	2024/25	2023/24
Number of HPDT hearings finalised	1	3	2	3
Tribunal costs and disbursements incurred	40	39	64	97
PCC costs and disbursements incurred	37	139	183	322
Total PCC and HPDT hearing costs ⁶	77	178	247	419
Total costs awarded to Council by HPDT	15	30	96	181
Fines charged	Nil	Nil	5	Nil
Total costs and fines awarded by HPDT	15	30	101	181
Actual costs recovered to date⁷	1	8	46	31
	1.3%	4.7%	18.6%	7.3%

⁶ These are just the external costs incurred in managing the HPDT hearings finalised, not the overall costs incurred during the year. These case costs may also have been incurred across multiple financial years depending on case complexity and external factors beyond Council's control (i.e., criminal court proceedings which take precedence)

⁷ The likelihood of the recovery of awarded costs can be significantly impacted by the scale of the awards combined with the individual financial and personal circumstances of practitioners

Disciplinary financials

Disciplinary reserve movement

\$'000s	2027/28 Forecast	2026/27 Budget	2025/26	2024/25	2023/24
Opening reserve balance	(156)	(301)	(340)	(262)	18
Movement for Year	355	145 ⁸	39	(78)	(280)
Closing reserve balance	199	(156)	(301)	(340)	(262)

Disciplinary income / costs (PCC & HPDT matters)

Costs for PCC/HPDT matters in the current 2026/27 year were budgeted conservatively at \$855k based on the likelihood of the number of PCC cases that might be concluded, and the number and timings of those being referred to, and subsequently heard by, the HPDT during the year.

\$'000s	2027/28 Forecast	2026/27 Budget	2025/26	2024/25	2023/24
Income					
Levies	1,536	970	997	607	395
Recoveries / Fines	30	30	30	113	181
	1,566	1,000	997	719	576
External Expenses					
PCC	570	456	456	300	292
HPDT	135	87	74	51	136
Other legal fees	20	-	18	39	20
Total External Expenses	725	543	548	390	448
Internal Costs					
Staffing, Governance, Organisation Support, General Overheads, Bad Debts & Debt Collection	486 ⁹	312	410	408	407
Total Internal Costs	486	312	410	408	407
TOTAL COSTS	1,211	855	958	798	855
Net Movement	355	145	39	(78)	(280)

⁸ Contingent on not exceeding budgeted expenditure for the 2026/27 financial year

⁹ Forecasted to increase for 2027/28 as percentage of FTEs assigned to compliance & discipline is higher

Part 3 – Fee for application for preliminary review for non-Comparable Pathway

The Pharmacy Council is seeking feedback on its proposal to increase the fee for an application for preliminary review for non-Comparable Pathway from \$950 to \$1,015.

The Council is proposing to increase the fee for an application for preliminary review for non-Comparable Pathway. This was previously called the 'Application for initial consideration' fee and was applied to the pathway previously called the non-Recognised Equivalent Qualifications Route (or non-REQR).

Why is this increase necessary?

Assessing applications of this nature involves much more than simply checking qualifications or certificates. Many applications require detailed review of an applicant's experience, skills, self-assessments, work history, and supporting documents. This involves professional judgement and follow-up with applicants to obtain further information or clarification.

Several Council team members review the applications, follow up any missing information, and prepare individual assessments. Applications are then reviewed by a senior manager with the appropriate pharmacy and education expertise to determine their merit.

While approvals can often be communicated quickly, declined applications require more detailed assessment and correspondence.

There is also ongoing work after an application has been assessed, including monitoring applicant progress through registration pathways and maintaining communication over several years where necessary. More complex applications can require significant additional time, multiple rounds of correspondence, and input from senior team members.

Notably, considerable work may also take place before an application is even submitted, as prospective applicants often seek advice about their eligibility or ask for documents to be reviewed for suitability.

Proposed increase

After completing a time study on these costs, the current fee does not fully reflect the amount of time, expertise, and support required to deliver this service. A proposed increase from \$950 to \$1,015 is therefore needed to ensure the true costs of providing the service are covered.

Part 4 – Application fee for Pharmacist Prescriber Scope of Practice registration

New Zealand applicants

The Pharmacy Council is seeking feedback on its proposal to increase the pharmacist prescriber registration fee for New Zealand applicants from \$105 to \$470.

Why is this increase necessary?

The current pharmacist prescriber registration fee of \$105 (including GST) does not adequately reflect the time required to process / assess applications. The process that Council team members undertake to register pharmacist prescribers includes:

- An initial 'at desk audit' of the submitted application (review of curriculum vitae, draft and final practice plans)
- A discussion / follow up with either the applicant and/or Clinical Lead and/or supervisor / mentor, then,
- Reviewing and acceptance of the updated practice plan

Dependent on the outcome of the initial process, further resourcing or support may also then be required for:

- An APC renewal practice plan review
- monitoring of applicants with conditions

Proposed increase

After reviewing these costs, the current fee does not fully reflect the amount of time, expertise, and support required to deliver this service. A proposed increase from \$105 to \$470 is therefore needed to ensure the true costs of providing the service are covered.

This change should be considered as an interim fee change as Council is currently working to update the scope of practice for pharmacist prescribers. Any changes agreed will require a recalibration of the process for registration, therefore costs (and fees payable) may change during 2027/28.

International applicants

The Pharmacy Council is seeking feedback on its proposal to decrease the pharmacist prescriber registration fee for New Zealand applicants from \$2,395 to \$470.

Why is this decrease necessary?

The current fee of \$2,395 for international applicants for prescriber registration is based on the cost of convening an external expert panel to assess applications. Since early 2020 Council has received only seven overseas applications for consideration.

Council believes that the same internal process as used for New Zealand applicants would be an appropriate tool to assess the suitability of applicants trained in overseas jurisdictions.

Applying the same fee as for domestic applicants will also reduce any perceived barrier to registration and may stimulate a greater interest in registration from overseas applicants.

Proposed decrease

After reviewing the application process, the current fee level is higher than necessary and may be perceived as a barrier to application. A decrease from \$2,395 to \$470 is therefore proposed.

As for domestic applicants, this fee should also be considered as an interim fee change pending the outcome of work on updating the scope of practice.

Part 5 – Reinstatement in the Intern scope of practice

The Pharmacy Council is seeking feedback on its proposal that the fee for reinstatement in the Intern scope of practice be increased from \$829 to \$997.

Why is this increase necessary?

The current fee of \$829 for reinstatement in the intern scope of practice (where an intern has been out for a period longer than two years) does not adequately reflect the time, judgement, and specialist input required to assess applications for reinstatement.

Many reinstatements require a detailed, case-by-case assessment of supporting material which goes beyond confirming standard documents such as degrees or certificates, and may include consideration of reflective material, professional development, practice history, and evidence of skills and competency.

Depending on the issues raised in the report prepared for each application, pharmacist or education expertise may also be required. Applications involving higher risk, unusual circumstances, or threshold decisions may also require additional input from the Registrar.

The fee is intended to recover the costs associated with the full end-to-end process. This includes assessing the application, updating the Register, extending the relevant scope condition, issuing a new annual practising certificate where required, preparing decision letters, and undertaking any case-specific monitoring or follow-up. Where an application is declined or raises additional risk considerations, further consultation with the Registrar and Council Chair may also be necessary.

With changes currently being made to registration pathways Council is anticipating there may be an increase in application volumes which is likely to place additional demand for team time and specialist input. The proposed fee increase would support a more sustainable and consistent approach to cost recovery while maintaining a robust assessment process.

Proposed increase

After reviewing these costs, the current fee does not fully reflect the amount of time, expertise, and support required to deliver this service. A proposed increase from \$829 to \$997 is therefore needed to ensure the true costs of providing the service are covered.

Part 6 – Other fees

The Pharmacy Council is seeking feedback on its proposal that other fees have a cost-of-living increase of 3.41% applied (rounded to the nearest dollar) per the table detail below.

Other Fees	Current 2026/27	Proposed 2027/28	Increase
	\$	\$	\$
Application for registration – Pharmacist (includes TTMRA ¹⁰ and non-Comparable Pathway)	400	414	14
Application for registration – intern pharmacist	240	248	8
Reinstatement to the register	160	165	5
Interview assessment	240	248	8
Transfer Scope Fee	35	36	1
Certificate of Current Professional Status	80	83	3
Inspection of the Register	80	83	3
Registration Certificate Replacement	80	83	3

¹⁰ Trans-Tasman Mutual Recognition Agreement

Part 7 – Banking system payment processing costs

The Pharmacy Council is seeking feedback on a proposal to incorporate payment processing costs into all fees through a standard 1.3% uplift, rather than applying separate surcharges to payments.

Why is this change necessary?

Whenever a payment is made to Council, banking system payment processing costs are incurred. These costs arise whether a practitioner pays by credit card, debit card, or through the Account-to-Account (A2A) payment system.

Under the current approach:

- Practitioners paying by credit or with debit card are charged a direct 2% surcharge.
- Banking costs associated with A2A payments are not separately charged to individual users because of the volume billing method applied by the provider of the A2A service.
- Council still incurs payment processing costs regardless of the payment method selected.

As a result, the current approach does not recover payment processing costs consistently and fairly across all practitioners.

How was the 1.3% figure calculated?

During 2025/26, Council incurred approximately \$57,000 in payment processing charges on fee income of approximately \$5.2 million (including GST). This equates to an average cost of around 1.25% on fee revenue. The proposed 1.3% uplift reflects this historical average, with a small allowance for normal fluctuations in transaction volumes and banking charges.

Credit card charges vary according to the type of card used and whether the issuer is a NZ domiciled or international provider. On average the highest charge noted in the previous year was around the 1.66% mark, but current rates can potentially reach around 2.27% (for the use of prepaid visa /master cards).

Billing to Council for A2A is a standard monthly base fee (regardless of volume) plus 1% of the transaction value rising to 1.5% when the monthly transaction threshold is exceeded (i.e., most notably for February / March – APC renewal, June & November - Intern to Pharmacist post Assessment Centre, and December - Graduate to Intern registration).

What would change?

Instead of some practitioners paying a separate surcharge at the point of payment, Council proposes incorporating the average cost of payment processing into all fees.

This means:

- There would no longer be a separate 2% credit card surcharge.
- The fee shown at 'checkout' would be the total amount payable.
- All practitioners would contribute equally to the overall cost of payment processing services.
- Council would recover payment processing costs more consistently and transparently.

Why is this fairer?

Council views payment processing charges as a shared administrative cost of collecting fees. Because all payment methods generate costs, and those costs cannot always be accurately allocated to individual practitioners, a standard uplift spreads the cost evenly across the profession. This approach avoids one group of practitioners bearing a disproportionate share of the costs while also simplifying fee administration and pricing.

Example

Current approach	\$	Proposed approach	\$
APC fee:	1,066	APC fee:	1,066
Credit card surcharge (2%):	21	Banking cost included (1.3%):	14
Total payable:	1,087	Total payable:	1,080

Payments currently made by A2A will incur the additional banking fee.

Proposed change

To ensure all practitioners contribute equally to the overall cost of payment processing services, Council is proposing to incorporate payment processing costs into all fees through a standard 1.3% uplift, rather than applying separate surcharges to payments.

Part 8 – Reserves and financial forecasting

The Pharmacy Council is seeking feedback on a proposal to establish a technology reserve, initially managed from within the General reserve, to ensure better oversight and planning for future technology funding requirements.

Why is this new reserve necessary?

Council funding is mainly received through fees and levies paid by practitioners; we receive no other funding to execute our fourteen statutory obligations under the HPCAA and have no mechanism to obtain and/or service loans.

Consequently, it is important that the Council's annual work programme¹¹ is planned and funded in a manner that promotes intergenerational equity, financial sustainability, and fee stability. It must also mitigate the risk of cross subsidisation between APC fees and disciplinary levies.

The current reserves balance forecast for the financial year ending 31 March 2027 is:

Reserves movement (\$'000s)	General	Technology ¹²	Disciplinary	Total
Opening 1 April 2026	1,257	-	(301)	956
Budget				
Plus: income	3,656	-	1,000	4,656
Less: expense	3,953	-	855	4,808
Surplus / (deficit)	(297)	-	145	(152)
(Technology reserve to be confirmed)	(275)	275	-	-
Closing 31 March 2027	685	275	(156)	804

Pending final approval by Council after the consultation process is concluded, the reserves balance forecast for the financial year ending 31 March 2028 is estimated to be:

Reserves movement (\$'000s)	General	Technology	Disciplinary	Total
Opening 1 April 2027	685	275	(156)	804
Forecast				
Plus: income	3,537	-	1,566	5,103
Less: expense	3,870	-	1,211	5,081
Surplus / (deficit)	(333)	-	355	22
Closing 31 March 2028	352	275	199	826

The 31 March 2028 forecast balances are more closely aligned to Council's minimum reserve policy of one month's operating expense in the General reserve and \$200,000 in the Disciplinary reserve.

¹¹ The work programme includes the 14 functions listed in the HPCAA, plus any projects to support and develop these functions. See p12 for more detail on the projects for the 2027/2028 year.

¹² Pending confirmation by Council December 2026

Technology reserve

As indicated in the table above, Council is currently considering whether an initial 'ringfence' of \$275,000 should be made from within the General reserve before the end of the 2026/27 financial year to establish the basis of a separate reserve (or segmented part of the General reserve) for Technology replacement purposes, to then be fully built up over time.

The effect of this 'ringfenced reserve' would potentially realign the remaining General reserve balance very close to its minimum level of one month's operating costs by 31 March 2028. Note that this is not proposed to be an additional fee to be paid in 2027/28, but an allocation to be managed initially from within the General reserve to ensure better oversight and planning for future technology funding requirements.

Given the strategic importance of Council's technology systems, failure to plan for their replacement (and form in effect a fund for technology replacement) could result in:

- Material one-off increases in practitioner fees in a short period;
- Delays in replacing ageing technology;
- Increased operational and cyber-security risks; and
- Reduced service quality to practitioners and stakeholders.

This establishment transfer:

- Would not reduce available cash resources¹³;
- Would not impact current year operating results;
- Represents a reclassification of accumulated equity;
- Improves visibility of funds earmarked for future technology investment; and
- Strengthens Council's ability to fund future technology replacement without placing undue pressure on practitioner fees in any given year (i.e., helps minimise the risk of significant fee increases for critical technology replacement).

Future contributions to the Technology reserve would be considered annually as part of the overall budget setting process and would consider:

- Forecast technology replacement requirements;
- Overall reserve levels (i.e. the impact of major disciplinary expenditure events);
- Financial performance;
- Fee affordability (i.e., stress-testing against lower-than-expected APC fee income); and
- Long-term financial sustainability objectives.

Proposed change

To prepare for future technology funding requirements, the Pharmacy Council is seeking feedback on a proposal to establish a technology reserve, initially managed from within the General reserve.

¹³ Setting aside \$275,000 of existing General reserve means those funds would not be available to offset future APC fee increases, but would reduce the risk of a sudden fee increase for urgent technology replacements.

Consultation Questions

The Council welcomes feedback on the proposals contained in this consultation document. We encourage respondents to provide reasons for their views and, where relevant, suggest alternative approaches for Council to consider.

Part 1: Annual Practising Certificate (APC) fee

1. Please share your feedback or comments on the Pharmacy Council's proposal to increase the APC fee for 2027/28.
-

Part 2: Disciplinary levy

1. Please share your feedback or comments on the Pharmacy Council's proposal to increase the Disciplinary levy for 2027/28.
-

Part 3: Preliminary review fee for non-Comparable Pathway applicants

2. Please share your feedback or comments on the proposed fee to assess non-Comparable Pathway applications, noting that currently the fees do not fully cover the resources needed to process these applications.
-

Part 4: Pharmacist Prescriber registration fees

- Please share your feedback or comments on the proposed Pharmacist Prescriber Registration fee increase for New Zealand applicants.
- Please share your feedback or comments on the proposed Pharmacist Prescriber Registration fee decrease for international applicants.

(Noting that this is an interim arrangement while work on the pharmacist prescriber scope of practice continues)

Part 5: Reinstatement in the intern scope of practice

- Please share your feedback or comments on the proposed fee increase for reinstatement in the intern scope of practice applications.
-

Part 6: Other miscellaneous fees

3. Please share your feedback or comments on the proposal for other miscellaneous fees to receive a standard cost-of-living uplift.
-

Part 7: Banking system payment processing costs

4. Please share your feedback or comments on the proposed change to banking system payment processing costs?
-

Part 8 - Reserves and financial forecasting

5. Please share your views on Council's proposal to establish a dedicated technology reserve (or segmented part of the General reserve) to support future system replacement and investment.
-

Final Comments

6. Are there any additional comments, observations or suggestions you would like Council to consider before making its final decisions?
-

Appendices

Appendix 1 – Construction of fees

Total Fee 2026/27 (\$)	1,020	1,020	1,120	1,120	669
Fee Construction (ex GST)	APC Pharmacist	APC Pharmacist RTP	APC Pharmacist Prescriber	APC Pharmacist Prescriber RTP	Intern
Base 2026/27 APC fee	684.78	684.78	771.74	771.74	379.56
Plus: 3.41% CPI increase for 2027/28 forecast expenditure	23.35	23.35	26.32	26.32	12.94
Less: Return of excess General reserves	-100.92	0.00	-113.75	0.00	0.00
Movement	-77.57	23.35	-87.43	26.32	12.94
Net APC fee payable	607.21	708.13	684.31	798.06	392.50
APC fee reduction / increase	-11.33%	3.41%	-11.33%	3.41%	3.41%
Base 2026/27 Disciplinary Levy	202.17	202.17	202.17	202.17	202.17
Plus: 25% increase for 2027/28 forecast expenditure	50.19	50.19	50.19	50.19	50.19
Plus: Bring Disciplinary reserve to policy minimum	67.64	-	67.64	-	-
Movement	117.83	50.19	117.83	50.19	50.19
Net Disciplinary levy Payable	320.00	252.36	320.00	252.36	252.36
Disciplinary levy increase	58%	25%	58%	25%	25%
Net movement excl bank processing fee	40.26	73.54	30.40	76.51	63.13
	4%	7%	3%	7%	9%
Net APC fee / Disciplinary levy Payable	927.22	960.50	1,004.30	1,050.41	644.86
Plus GST	139.08	144.07	150.65	157.57	96.73
Total Fee Payable	1,066.29	1,104.56	1,154.95	1,207.98	741.59
Plus Bank processing fee (BPF) @ 1.3% (no GST)	13.86	14.36	15.01	15.70	9.64
Total Fee including BPF	1,080.15	1,118.92	1,169.96	1,223.68	751.23
Increase	60.15	98.92	49.96	103.68	82.23
	5.90%	9.70%	4.46%	9.26%	12.29%
Total Fee - Rounded	1,080.00	1,119.00	1,170.00	1,224.00	751.00