



New Zealand Hospital Pharmacy Association (Inc)

Te Kāhui Whakarite Rongoā Hōhipera O Aotearoa

Pharmacy Council APC Fee Consultation 2024/25

New Zealand Hospital Pharmacy Association (NZHPA) welcomes the opportunity to submit feedback on the proposed fee changes and has sought feedback from our members.

Overall feedback is that members are concerned about the price increase given the increased pressures with cost of living and would like more clarity around the increase, in particular the disciplinary levy.

Seeking clarity

We would appreciate further clarity around the increase in the disciplinary levy. In comparison to current disciplinary levies for other health professions the proposed figure is fairly high. We would like to understand the drivers for these increased costs, for example, are pharmacist disciplinary proceedings more expensive than other professions or are there more proceedings taking place?

A number of our members were supportive of additional costs being shouldered by the pharmacists undergoing disciplinary proceedings rather than every APC holder.

We would like assurances that costs are being saved where possible with a couple of examples being:

- \$47,000 has been allocated for stakeholder engagement. What does this entail? Could this be reviewed and reduced?
- General Office expenses of \$42,000 includes photocopying, printing, postage, couriers, and telecommunications. What consideration has been given to reducing the amount of hard copy production and decreasing the environmental impact of printed information?

We believe that transparency of cost increases could be improved by providing a comparison with existing fees and a percentage change in future consultation.

Impacts of a cost increase

Many of our members will have their APC fee paid by their employer, directly increasing the cost to the health system.

For pharmacists required to self-fund their APC an increase has the potential to compound existing financial pressures and disproportionately affect the wellbeing of pharmacists in a vulnerable position.

NZHPA members do not wish to see the cost of an APC being a barrier to attracting or retaining pharmacists into our profession, particularly at this point where a workforce shortage is a national priority.

Thank you for the consideration of our submission.

New Zealand Hospital Pharmacy Association (Inc)

Supporting excellence in the practice of hospital and clinical pharmacy, promoting effective medicines management for everyone in New Zealand

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