



# New Zealand Hospital Pharmacy Association (Inc)

Te Kāhui Whakarite Rongoā Hōhipera o Aotearoa

## Consultation on disciplinary levy and APC fee for the 2025/2026 Practising Year

Kia Ora and thank you for the opportunity to submit feedback on your proposal.

The amount of feedback from our members has been small and may reflect the desire to feedback individually or, that for the most part our employers bear the full cost of the APC fee.

There are some points that we would like to take the opportunity to raise. Firstly, is to seek assurance around fiscal responsibility. By that we mean to ensure that money is not being spent on unnecessary resources e.g., travel, printing costs. There is an expectation from pharmacists that you are operating as efficiently as possible.

Secondly, with regard to the disciplinary levy our members raised concerns that the majority of registered pharmacists are bearing the brunt of these additional costs in cases where a pharmacist has clearly and intentionally done something illegal for their own gain. It would be helpful to understand why the pharmacist involved does not pay for or contribute toward the costs of the investigation.

It is well recognised that understaffing and increased workload increase the risk of errors. Our members would like to see efforts directed towards addressing some of the likely root causes of the increase in the number of complaints as a proactive rather than reactive measure by Council.

We would be interested to understand the underlying reasons for the increase in disciplinary processes and what you see as the role of professional organisations in supporting addressing these issues.

Ngā mihi

Clare Greasley  
President

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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