



Response The Pharmacy Councils Consultation on Proposed Increase in APC and Written examination fees

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Sent via email: consultations@pharmacycouncil.org.nz

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Tēnā koe Michael,

APEX is an Allied Scientific and Technical union, amongst our groups we represent an increasing portion of Pharmacists employed by District Health Boards in New Zealand. As such we respond to the consultation documents, and have further encouraged our members to all respond individually.

Our response is as follows:

Annual Practising Certificate (APC)

- Restructuring of fees should have clearly defined review points, and not done yearly or two yearly as costing projections and perceived capital expenditure along with proposed regulatory changes should be factored into the fee setting structure, and reserve factored in to meet any unforeseen expenditures. This is increasingly important for the DHB employed subset of your membership who are employed by a majority of DHB's who are experiencing under funding, and who struggle to meet the expenditure incurred by continuous fee increases.
- The proposed fee increases are not in line with the majority of other Allied and Scientific Professionals that are required to be registered under the HPCAA, have similar regulatory and statutory requirements and disciplinary cases.
- Whilst the pharmacy council is happy to compare Pharmacists to Dentists and Doctors, the regulatory and statutory requirements and indemnity requirements and usage for these two groups are significantly higher and so it is like comparing an apple to a pear.
- If it is the continued preference of the Pharmacy council to consider Dentists and Doctors as relative to pharmacists then we would suggest that the Pharmacy Council should be advocating for the equivalent salaries for Pharmacists employed at DHB's, as their salaries are considerably less than these two professions and to Pharmacists employed in the community and private sector.

- Given our point above the council should consider a separate fee structure for DHB employed practitioners versus community/private employed practitioners.
- What other measures has the Pharmacy Council looked at or taken prior to proposing this latest fee restructure?

Written Examination Fee

- The timing of this increase will add increased hardship to Pharmacists as well as their employers. One would have to ask why both needed to be done at the same time?
- This is a significant change to the current cost given there has been very little change in the process over the recent years.
- There is very little information provided to justify the Pharmacy councils rationale for the increase, such as:
 - Membership data to support a significant increase in the number of examinations being undertaken.
 - Financial accounts to show revenue versus expenditure to justify the increase.
 - Details of which costs have increased and by how much.

Without these minimum details APEX raises serious concerns as to the validity of the Pharmacy Councils claim with regards to increasing the written examination fee. APEX also questions if this is a genuine consultation on the matter or whether this has a predetermined outcome. This information should be provided to all stakeholders prior to proceeding any further with this consultation.

APEX would expect to receive a response to the questions we have raised, as well as be copied in to feedback from the consultation and any changes resulting from this or other outcomes.

In future can you please include APEX in communications on matters affecting Pharmacists and Pharmacy Technicians employed within DHB's.

Nāku iti noa, nā



Denise Tairua
Advocate
APEX