

13 March 2026

Pharmacy Council of New Zealand
Level 7
22 The Terrace
Wellington 6143

Sent via email to: submissions@pharmacycouncil.org.nz

Dear Sir/Madam,

Re: Advancing future pharmacy practices through regulation

Thank you for the opportunity to provide feedback on the above engagement.

The Pharmacy Guild of New Zealand (Inc.) (the Guild) is a national membership organisation representing community pharmacy owners. We provide leadership on all issues affecting the sector and advocate for the business and professional interests of community pharmacy.

We support the Council's willingness to consider how regulatory levers can be adapted to enable pharmacists to practice safely and to the full extent of their competence. However, given this is not a formal consultation, the feedback we have provided is high-level and reflects preliminary comments. We welcome the opportunity to provide more detailed responses as part of any future formal consultation.

General comments

- Regulation should be proportionate, risk-based, and economically sustainable.
- Regulatory frameworks should enable safe, sustainable practice, rather than simply expanding procedural responsibility without appropriate support.
- Regulatory reform cannot be considered in isolation from workforce sustainability, service commissioning, funding, and broader health system infrastructure.
- While regulation can enable capability, long-term sustainability depends on how that capability is funded, supported, and integrated into the health system.

High-level comments on discussion document

Topic 1: Statement on innovative practice

We support the concept of innovative practice and the intention to encourage pharmacists to practice to the full extent of their competence while maintaining safe and responsive care for patients. Enabling pharmacists to expand their practice and develop new services is important for improving access to care and ensuring the profession continues to evolve in response to patient and system need.

However, we do not consider the current Statement of Innovative Practice to be sufficiently detailed to effectively support this objective, and in its current form, a high-level statement alone is unlikely to shift practice across the sector or provide pharmacists with the confidence needed to develop and implement innovative services.

To enable pharmacists to adopt innovative approaches in a safe and consistent way, practical tools and clear guidance are required, including supporting pharmacists to upskill where appropriate,

ensuring recertification expectations are clearly understood, and providing clarity on how innovative practice can occur within existing scopes and professional standards.

Currently, some pharmacists lack confidence that new or emerging services align with their scope of practice, professional standards or regulatory expectations, and this uncertainty can act as a barrier to innovation, even where pharmacists are well placed to deliver services that would benefit their communities. The development of practice-focused guidance, including examples of acceptable innovative practice and clear expectations around risk management and quality, would help mitigate compliance concerns while supporting pharmacists to implement new services confidently and consistently across the sector.

Topic 2: Registration pathways

We are keenly aware of the workforce issues impacting community pharmacy and support the Council exploring changes to registration pathways that could enable overseas trained pharmacists to enter the New Zealand workforce more easily and quickly. We support the Council's consideration of broadening eligibility for the Recognised Equivalent Qualification Route (REQR) and removing the Competency Assessment of Overseas Pharmacists (CAOP) requirement, where this creates unnecessary cost and delay for applicants.

However, appropriate safeguards must remain in place to ensure patient safety and maintain confidence in the profession, including ensuring overseas trained pharmacists demonstrate cultural competence requirements for practice in New Zealand, as well as completing structured supervision and transparent competency assessment processes where appropriate.

We also note Council's acknowledgement that changes to registration pathways are likely to increase supervision requirements across the sector, and any recruitment reforms must therefore consider the practical implications for community pharmacies, including the additional supervision responsibilities placed on an already stretched workforce.

While changes to registration pathways may help increase the flow of pharmacists into New Zealand, they are unlikely to address workforce challenges on their own, and broader issues such as retention, workload pressures, and distribution of pharmacists across the country will also need to be considered to ensure a sustainable pharmacy workforce.

Topic 3: Expanded roles via scope endorsements

We are interested in working with the Council to better understand how endorsements could be used as a regulatory mechanism to expand pharmacists' scope of practice in a targeted and flexible way.

If implemented appropriately, endorsements could provide a pathway for pharmacists with additional training and competence to undertake expanded roles without requiring the creation of entirely new scopes of practice. We recognise that endorsements may provide a mechanism to acknowledge specialised practice, support career progression, and provide greater clarity for the public and employers about the roles pharmacists can undertake, however, it will be important that any endorsement framework is applied proportionately and only where there is a clear need for additional regulatory assurance.

Careful consideration will also need to be required to ensure that any endorsement framework does not introduce unnecessary regulatory burden or additional costs for pharmacists or employers, and any administrative requirements, ongoing competency expectations, and how

endorsements would be integrated into existing recertification and professional development processes will need to be clearly defined.

It would also be helpful to understand what additional activities endorsements might enable beyond the current pharmacists' current scope of practice, and how these would align with workforce needs, patient safety considerations, and the broader health system. This includes whether endorsements represent the most effective regulatory approach compared with other options such as accreditation, credentialing, or additional scopes of practice.

Any endorsement framework should ensure that regulatory requirements remain proportionate to the level of risk associated with the activity being endorsed, and that the costs of implementing such a framework, including any potential impact on APC fees, are carefully considered.

Topic 4: Prescribing

We strongly support enabling pharmacists to practice to the full extent of their competence, including prescribing. We are currently participating in a working group exploring the development of pharmacist prescribing scopes and look forward to continuing to contribute to this important work to ensure that the development of prescribing roles appropriately considers both the opportunities and risks for the various prescribing functions that community pharmacists could undertake.

We recognise the Council's discussion of a prescribing continuum and the potential for pharmacist prescribing to occur at different levels, from protocol-based prescribing for minor ailments through to more advanced prescribing roles. Expanding prescribing in a staged and structured way has the potential to improve timely access to medicines and better utilise pharmacists' clinical expertise, particularly in community settings.

It will be important that any progression of prescribing roles is carefully staged and supported by clear training requirements, clinical protocols, and appropriate governance frameworks to ensure patient safety and consistency of practice. Consideration will also need to be given to the practical system supports required, including access to relevant patient information, integration with primary care teams, and clear service models to support safe and effective prescribing.

Topic 5: Regulating technicians and Pharmacy Accuracy Checking Technicians (PACTs)

We recognise that pharmacy technicians play an important part of the pharmacy workforce and that there is a growing interest within parts of the sector in regulating technicians and PACTs. Regulation may improve visibility of the technician workforce and provide greater recognition of the important role technicians play within pharmacy teams.

However, regulation is also likely to create additional financial and administrative burdens for technicians and employers, which could act as a barrier to entering or remaining in the technician workforce, and community pharmacy needs to carefully consider whether the additional costs associated with regulated technicians would be viable in practice.

Importantly, regulating this workforce is unlikely to change the existing accountability framework, whereby pharmacists retain professional and legal responsibility for the safe supply of medicines. Pharmacist supervision currently provides an important safeguard for patient safety, and it is unclear whether regulation would deliver additional safety benefits beyond the existing model.

Given the significant work and cost involved in establishing a regulatory framework, careful consideration should be given to whether regulation is necessary or whether alternative non-regulatory mechanisms could better support workforce development, role clarity, and career progression for technicians and PACTs. It is also unclear whether regulating this workforce falls within the Pharmacy Council's current mandate.

Prioritisation and cost implications

Of the five topics outlined above, we consider registration pathways and prescribing to be the key priorities, as these have the greatest potential to help ease workforce pressures and support the continued development of the sector's vital growing role in delivery patient care.

We would welcome clarification on whether progressing any of the initiatives outlined in this discussion document would result in increased costs to the community pharmacy sector, such as higher Annual Practising Certificate (APC) fees, as this may influence both our position and that of our members regarding the desirability and timing of progressing these initiatives.

Thank you for the opportunity to provide feedback on this discussion document and consider our response. If you have any questions about our feedback, please contact our Senior Advisory Pharmacists, Martin Lewis (martin@pgnz.org.nz, 04 802 8218) or Cathy Martin (cathy@pgnz.org.nz, 04 802 8214).

Yours sincerely,



Nicole Rickman

General Manager – Membership and Professional Services