

12 December 2024

Dear practitioners and stakeholders,

[Outcome from the 2025/26 proposed budget and fees consultation](#)

The outcome from the 2025/26 proposed [budget and fees consultation](#) is set out below.

We received [six submissions](#) from a total of 5,587 practitioners and stakeholders. Thank you to those who provided feedback.

The submissions were considered by the Audit and Risk Management Committee on 22 October 2024 and approved by Council on 4 November 2024.

The budget approved is for the year from 1 April 2025 to 31 March 2026. The fees and levies approved by Council take effect on 1 April 2025.

After considering the budget and workplan for the next two years, and feedback from submissions received, Council approved the following fees:

- registration, examination, competence programme, fitness to practice and other miscellaneous fees; and
- the annual practising certificate (APC) fees and disciplinary levies for 2025/26 as set out below.

Table 1 shows approved fees and levies payable for the 2025/26 year (excluding GST).

Profession	APC Fee	Disciplinary Levy (refund)	Total
Dentists and dental specialists	\$1,137.18	\$105.89	\$1,243.07
Oral health therapists	\$868.47	(\$0.59)	\$867.88
Dental hygienists and orthodontic auxiliaries	\$701.67	\$90.97	\$792.64
Dental therapists	\$933.78	(\$50.82)	\$882.96
Dental technicians and clinical dental technicians	\$804.80	(\$0.09)	\$804.71

The 2025/26 fees and levies will be published in the [New Zealand Gazette](#) in January 2025 and take effect from 1 April 2025.

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The APC fee and disciplinary levy for professions with a practising year 1 April 2025 – 31 March 2026 will be payable from the date the APC renewal form is issued.

Summary of feedback and Council's responses

The primary feedback received from the submissions and Council's consideration were as follows:

1. *There is no reduction in fees for dentists holding APCs going back to university to specialise. These individuals only practise part time.*

Council appreciates that undertaking further specialist study is a significant personal commitment and comes with a high financial burden. In setting fees and levies Council follows the good practice guidelines established by the Office of the Auditor General. Under these guidelines, practitioners need to have confidence that Council charges an amount which reflects the costs of producing the good or providing the service. Principally this means that we do not seek to disproportionately recover costs from one group that could benefit another group, as this creates equity issues between groups of fee payers. The elimination of cross subsidisation is a key outcome under the equity principle of the guidance.

Council costs are broken down into operational and disciplinary related costs. The standards to uphold and the cost to the Council per practitioner are the same regardless of the status or number of hours worked by that individual. Offering a discount to a particular group would mean we would not be following the good practice guidance.

In addition to working in the general dental scope of practice outside of study hours, postgraduate students perform clinical education for undergraduate students who are not registered and therefore need to be supervised by a registered practitioner, both of which require you legally to hold an APC.

2. *Not increasing fees for the dental hygiene profession would better reflect fees charged in overseas jurisdictions.*

When setting the budget, Council were very mindful of rising cost within the New Zealand economy. The budget proposed a deficit funded from a reduction in reserves rather than from an increase in APC fees or disciplinary levies. This reduces total reserves held and has meant that the overall cost for all professions other than dentist/dental specialists will be less than that of 2024/25 fees/levies.

Whilst Council appreciates that costs in other jurisdictions like the USA are lower, dentistry in New Zealand operates in a much different legal environment and with a significantly smaller population base.

3. *Highlighting the importance of the pending Health Practitioners Competence Assurance Act 2003 review, with particular reference to the opportunity to seek alignment of oral health therapy, dental therapy, and dental hygiene.*

Council agrees that the review of the Health Practitioners Competence Assurance Act 2003 is of extremely high importance to the entire oral health profession. As the outcomes of this review is to ensure patient safety is effective through appropriate and proportionate regulation and improve patient health outcomes in New Zealand.

Since the announcement of the review, Council have been actively engaging with both the Ministry of Health (MoH) and fellow regulators. We will continue to engage and influence where possible to ensure a strong regulatory environment and appropriate regulation that is risk based.

Whilst the MoH is liaising with Council and other health regulators and some consultation has been done, the formal consultation process on the changes and amendments to legislation has not yet commenced. There is potential for consideration to be given to merging of professions as part of the legislation changes still to be proposed.

This uncertainty created a challenge for us as we prepared our budget and consultation document. As indicated in the consultation, the impact of any work Council will need to do in 2025/26 is not fully known. Council have specifically budgeted for \$100k of spend for the review but await further information on the nature and degree of change expected, to eventually be able to provide more certainty over the cost impact to us.

Thank you again to those who provided feedback during the consultation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'MacKay', with a long horizontal flourish extending to the right.

Marie MacKay
Chief Executive