

19 December 2025

NZIDT Submission on Proposed 2026/27 Fees and Levies

Executive Summary

The New Zealand Institute of Dental Technologists (NZIDT) is concerned that the proposed 2026/27 annual practising certificate (APC) fees and disciplinary levies for dental technicians and clinical dental technicians represent a disproportionate increase relative to demonstrated regulatory risk.

Dental technicians face the largest APC fee increase of any oral health profession, alongside a proposed disciplinary levy, despite the consultation document confirming there is no current disciplinary activity within this profession. NZIDT questions whether the scale and timing of these increases are justified where they are driven largely by reserve adjustments rather than immediate operational or disciplinary demand.

Imposing substantial increases in a single year creates avoidable financial shock for practitioners and risks undermining confidence in the fee-setting process. NZIDT therefore requests that the Dental Council reconsider the proposed increases and, if reserve adjustments are to be pursued, implement them through a phased approach for dental technicians and clinical dental technicians.

Introduction

The New Zealand Institute of Dental Technologists (NZIDT) appreciates the opportunity to make a submission on the Dental Council of New Zealand's proposed 2026/27 fees and levies consultation.

NZIDT represents registered dental technicians and clinical dental technicians across New Zealand. Our members support effective regulation that protects public safety and maintains professional standards. However, they are also highly sensitive to affordability pressures, particularly given the current economic climate, workforce challenges, and the comparatively modest earning capacity within our profession.

Overall Concern

NZIDT is concerned that the proposed fee and levy increases for dental technicians and clinical dental technicians are disproportionately high relative to both historical levels and demonstrated regulatory risk.

NZIDT questions whether the scale and timing of the proposed APC and disciplinary levy increases are proportionate to demonstrated regulatory risk or current activity. Imposing substantial increases in a single year creates avoidable financial shock for practitioners and risks undermining confidence in the fee-setting process. NZIDT submits that where increases are driven largely by reserve adjustments rather than immediate operational or disciplinary demand, a phased approach over multiple years would be more appropriate and equitable for a small, low-risk profession.

Disciplinary Levy Concerns

NZIDT acknowledges the Council's need to plan for potential disciplinary matters. However, we are concerned that dental technicians and clinical dental technicians are being asked to fund a materially increased disciplinary reserve in the absence of any current or recent disciplinary

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cases.

A precautionary approach to reserve setting must still be proportionate and transparent. Without clear evidence of increased risk, the proposed levy risks being perceived as excessive and difficult for practitioners to reconcile with their experience of regulation.

APC Fee Increase and Reserve Management

NZIDT notes that the Council attributes the APC fee increase for dental technicians largely to the need to rebuild minimum operational reserves following historic returns of capital. While NZIDT understands the mechanics of reserve management, we are concerned that this has resulted in a sharp year-on-year correction rather than a predictable and gradual approach to fee setting.

Sudden increases of this scale create budgeting difficulties for practitioners and laboratories, many of whom are already facing rising costs and constrained margins. NZIDT considers that greater predictability and smoother adjustments would support both compliance and confidence in the regulatory system.

Workforce and Affordability Impacts

Dental technicians have limited ability to pass regulatory cost increases on to patients or practices. Significant increases in APC fees and levies risk discouraging retention within the profession and may act as a barrier to re-entry for practitioners considering returning to the workforce.

This is particularly concerning in the context of wider workforce pressures and the Government's stated objective of improving access to care.

NZIDT Recommendations

NZIDT respectfully requests that the Dental Council:

- Reconsider the scale and timing of the proposed APC and disciplinary levy increases for dental technicians and clinical dental technicians.
- Review the proportionality of disciplinary levies in light of the profession's low disciplinary risk profile.
- If reserve adjustments are to be pursued, adopt a phased approach to reduce financial shock to practitioners.
- Improve transparency around profession-specific reserve targets and how these are reviewed over time.
- Engage with NZIDT on developing a more predictable, risk-aligned fee-setting approach for the profession.

Ngā mihi



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New Zealand Institute of Dental Technologists