

2026/2027 Annual Practicing Certificate Fee Change Consultation Response

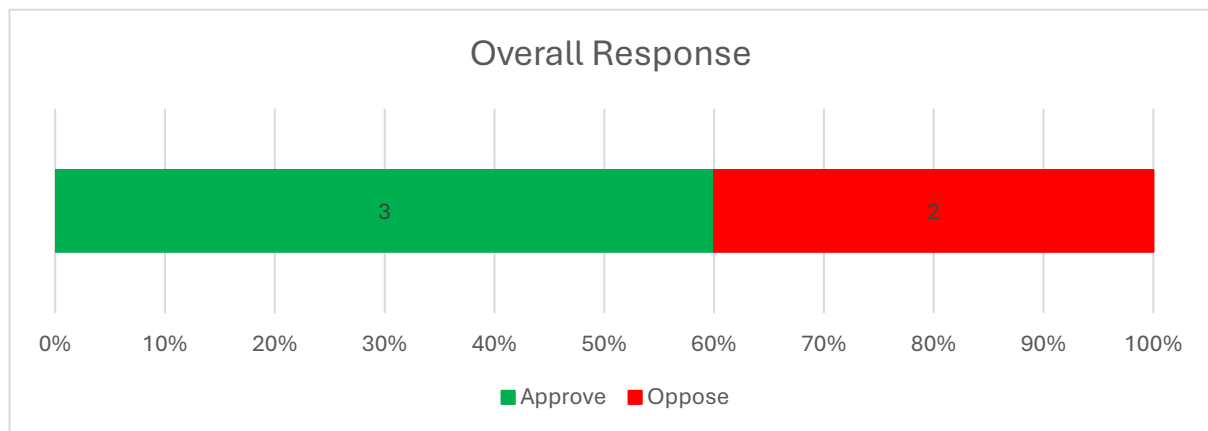
Summary of Responses

Consultation opened on 11th December 2025 and closed on 16th January 2026.

All registered osteopaths were invited to respond to the consultation via electronic notice issued on 11th December 2025, with a further reminder via Council newsletter on 16th December 2025.

As of the closing date, five responses were received by the Council. While Council recognises that this is a low level of response, it is commensurate with recent OCNZ consultation response rates.

Of these five responses, 60% (n=3) approved of the proposal, and 40% (n=2) were opposed to the proposed changes.



Reasons for Opposing

High expenses for first-year graduates

One submission opposed the fee increase due to the perceived high level of expenses incurred by a newly registered osteopath. The submission included a suggestion that a newly registered practitioner's first APC could be discounted to ease the financial burden of the initial year of practice.

Response: While we recognise that establishing a new practice can include a range of expenses, the Council is not able to subsidise these individual business expenses through reduced APC fees. As the primary source of funding for the Council is through APC fees, any discount applied may, in effect, be subsidised by other practitioners through an increased general APC fee. New practitioners may also be able to mitigate the costs of practice through employment arrangements or other sources of funding.

Continued impact from COVID-19 pandemic

One submission opposed the fee increase due to the continued impact of the COVID-19 pandemic (and response) on business performance and practitioner wellbeing. The submitter raised concerns that increased financial pressures from the increased fee may aggravate these issues.

Response: The Council is aware that the impact of the pandemic may have resulted in a lasting impact for some practitioners and their businesses. For the year beginning 1st April 2022, the Council approved a 20% reduction in the total APC fee. This significant reduction was partially in response to the financial pressure osteopaths faced due to the COVID-19 pandemic. After maintaining this reduced fee for a number of years, Council is now in a position where maintaining this reduction is no longer prudent. The relatively modest increase in APC fee proposed in this consultation is intended to strike a balance between returning Council's income to a sustainable level while avoiding significant and sudden increases in fees.

Additional Comments

Disciplinary levy

One submitter questioned Council's proposal to maintain no disciplinary levy, despite the apparent upward trend in disciplinary activity. They queried whether Council had considered proposing a 'nominal' disciplinary levy for the 2026/2027 APC period.

Response: Council has recognised that it holds a Disciplinary reserve that is above the desired level and is currently aiming to reduce this reserve. Previously, when charging a 'nominal' levy of \$5.00, Council found that the rate of reduction in reserves was less than intended. The funds collected through a disciplinary levy may only be spent on disciplinary matters, and reducing these reserves is reliant on a deficit in disciplinary income versus expenses. Council may consider reintroducing a levy if the current trend of increased disciplinary activity continues but is also mindful of avoiding any unnecessary accumulation of funds.

Provision for maternity leave

One submitter proposed that Council consider options for a part-year Annual Practising Certificate to allow provision for practitioners going on maternity leave.

Response: While Council's standard practice is to issue APCs for a full year, Council may consider proportional APC fee refunds where a practitioner only intends to practice for a portion of the year. This would generally be limited to cases where the practitioner would not be returning to practice before the end of the APC period (i.e., returning on, or after, the 1st of April). This may include, for example, situations where a practitioner only intends to work the first 6-months of the APC period due to anticipating long-term parental leave from the mid-way point. Council also charges an apportioned fee for practitioners who apply for an APC part way through an APC period. Together, these provisions should allow flexibility for practitioners intending on taking parental leave, or other long-term absences from practice.