



**Chinese Medicine Council
of New Zealand**
新西兰中医管理局

Consultation Outcomes: Proposed amendments to APC fees

In October 2025, the Chinese Medicine Council of New Zealand (The Council) published a consultation document setting out a proposed reduction in APC fees for 2026/27 in accordance with section 130 of the Health Practitioners Competence Assurance Act 2003 (the HPCA Act).

This report provides a summary of the key themes of the consultation feedback, and the Council's final decision.

The Council extends its thanks and appreciation to the individuals and group who provided feedback.

Consultation Overview

Consultation respondents were asked to provide their feedback via email. There were no specific questions provided to submit on.

8 submissions were received, from:

- Acupuncture New Zealand (AcNZ)
- Individual Chinese medicine practitioners (7).

Results

The following summarised comments were submitted by respondents:

- CMCNZ should reduce practitioner fees to no more than \$500.00, following the government's example of tightening spending. Explanations/justifications on registration committee fees (why they aren't covered by registration fees), bank fees, and ongoing high spending on IT (more than \$90,000 even though CMCNZ is "set up steadily") should also be provided. Acupuncturists earn less than the New Zealand median income and that prior to CMCNZ, practitioners only had to pay the one Acupuncture association membership fees. Also noted that the newsletter frequency should be reduced to four times a year. To reduce costs, the following suggestions were made:
 - reducing CPD audits from 20% of acupuncturists per year to 10%; closer scrutiny
 - potential reduction of Council and staff travel, staff allowances, photocopying and postage.
- Strong support for the proposed APC fees for 2026-27 and the Council's overall fiscal approach. We appreciate being able to learn the full breadth of the Council's responsibilities, such as accreditation and monitoring of New Zealand acupuncture programmes. We praise the Council's care, clarity, integrity and financial responsibility towards the repayment of the AcNZ loan and having a clear plan for long-term financial sustainability.

- CMCNZ is commended on the fee structure for practitioners applying for APCs after October and for keeping costs as low as possible while upholding high professional and ethical standards that benefit both practitioners and the public.
- Objection to the proposed fees due to it being unaffordable to many practitioners due to financial strain. There is inequity as registered acupuncturists cannot issue ACC certificates directly, and must instead rely on GPs, physios or chiropractors who control access to ACC claims and commonly take 50-55% commission when hiring acupuncturists as subcontractors. There is a physical, financial and mental pressure with a 22-hour paid CPD fee, juggling of multiple part-time clinic roles to maintain a basic living standard, and the proposed fee on top of subcontractor commissions and existing costs. The fees are inappropriate while acupuncturists lack ACC issuing rights and are structurally disadvantaged against GPs, physio and chiropractors. The Council should advocate for the profession rather than only supervise and charge high fees; the Council should prioritise their efforts towards achieving ACC issuing rights.
- The proposed APC cost for 2026-27 is fair and appreciate the clear breakdown of how the fee is calculated. The Council is commended for keeping expenditure at a reasonable level.
- “Cheaper is better”.
- I appreciate the Council’s efforts to reduce the overall APC fee while maintain essential reserves for disciplinary and operational costs. I support the proposed approach and the continued transparency in budgeting and fee setting.
- I support the proposed total fee and accept the increased disciplinary levy but want more annual transparency on the numbers/types of complaints, the number of PCC investigations and tribunal cases, and actual disciplinary costs and amounts recovered from practitioners. This data would help practitioners learn from patterns of complaints and avoid repeating mistakes. We are worried about ACC’s 2021 cut to acupuncture visits after some practitioners made illegal ACC claims, and stress that while acupuncture can help manage symptoms of serious diseases, ACC only covers accident/injury and practitioners must respect that limit. We want to prevent further ACC cuts and protect long-term viability of Chinese medicine in NZ. Profession-wide, standards and compliance must be tightened to stop further ACC reductions, which includes improving practitioner understanding of what can/cannot be claimed, make advertising very clear on what ACC does/does not cover, and encouraging more non-ACC clinical work. The Council should:
 - audit and enforce advertising standards by regularly reviewing websites/advertising, taking strong action when rules are broken, and publish de-identified case summaries so others can learn.
 - Provide clear, practical examples of permitted vs. prohibited wording, real world examples of breaches and their consequences, and guidance on how to advertise non-ACC services appropriately.
 - Actively engage with ACC through periodic meetings to show regulation is working and to maintain a constructive relationship to avoid further cuts to coverage.
- We are pleased to see a reduction in APC fees for 2026/27 and appreciate the Council’s ongoing commitment to lowering fees. Our members have a high interest in the development of a restorative complaints’ framework, welcoming more information on this project and if there will be

an opportunity for the profession to provide feedback as it's being developed. This is the 2nd year with a specific budget allocation for engagement with the CMBA under the TTMRA 1997; does the Council anticipate that a dedicated budget line will be needed on an ongoing basis? We support the 26/27 levy, understanding the challenge of predicting disciplinary caseload in early years of regulation and the need to build a disciplinary reserve, but encourage close monitoring and reducing the levy for 27/28 if disciplinary activity remains low. We support the proposed approach to invoicing for accreditation costs as outlined in the consultation document.

Response

Income and Affordability

There is no correlation between APC fees charged and the income a profession earns. The Council's general operating expenses are covered by the annual practising certificate (APC) fee that each Chinese medicine practitioner must pay as part of their application to receive a practising certificate each year. The Council does not receive funding from the government or any other source to operate.

Operating expenses include:

- Secretariat costs including staffing, IT, financial management, rent etc.
- Council and committee member fees and travel expenses
- Case management costs for competence and fitness matters
- Communications and stakeholder liaison
- Developing, implementing, and monitoring compliance with relevant standards, policies, and competence assurance processes
- Legal fees for outsourced legal assistance
- Capital expenditure, e.g. database, website etc.

From early in the application process for the profession to become regulated estimates of the anticipated costs of regulation and the predicted APC fee were calculated. A figure of around \$800 per practitioner (excluding any disciplinary levies) was estimated. The profession assured the Government that it could meet these costs and the Council is committed to doing its best to keep its overheads low in order to maintain or reduce this level of APC fee, incl. an annual review of all expenditure areas including bank fees, IT costs, and legal fees.

The Council acknowledges that the past couple of years have been challenging and some may have experienced financial hardship as a result or may be just starting out in practice and may find paying the Council's fees all at once difficult.

In recognition of this, the Council has implemented a policy on accepting payment by installment for annual practising certificate (APC) fees for those earning under a certain amount. This policy applies to APC fees only (not registration fees) and requires part-payment at the time of application, followed by a commitment to pay the rest by regular instalment over the practising period. This policy is in place and can be found on the 'Fees' page of the Council's website.

Work and Income New Zealand (WINZ) is also available to assist those experiencing financial hardship and may be able to contribute towards the costs associated with maintaining professional practice. Both of these options were utilised by practitioners during 2024-25/the current practising year.

Engagement with ACC

The Council will continue to engage with ACC on matters relating to the regulation of Chinese medicine. While this may, at times, intersect with some of the work the professional bodies may be doing to advocate for the profession, for example: advocating for greater access to care/greater choice of who to seek care from for New Zealanders/patients, it is not the Council's role to advocate for the profession in this way. This will continue to be the role of the professional bodies.

CPD audit percentage

One of the main functions of the Council is to assure the public that practitioners remain competent to practice and are complying with Council standards and recertification programmes. Auditing 20% per annum is standard across the regulated professions, and unfortunately, audit feedback to date indicates the profession is still coming to grips with recertification/CPD and complying with Council standards so the Council is not in a position to reduce this percentage from a public safety perspective. The Council has invested in enhancements to the CPD portal to make compliance easier and is working hard to support those who are struggling to comply to reduce the resource needed for audits but this will take time.

Information about complaints, outcomes, and trends

This information is readily available in the Council's Annual Report which can be found on the '*Council Communications*' page of the website. The Council also recently delivered a presentation on 'Normalising complaints: a Regulatory Perspective' that included information about complaint trends. A recording of this presentation is available for download from the '*Recertification/CPD*' page of the website.

Specific expenditure areas noted

Council member travel/expenses

The Council has no control over who is appointed to the Council and where they live. The Minister of Health makes these appointments. The profession (by way of APC fees) therefore has to meet the cost of Council members travelling to and from meetings. The Council has chosen to meet far less frequently than other health regulators to try and off-set some of these costs. We also book travel in advance to get the best fares etc.

Photocopying/postage

The Council does very minimal photocopying and postage and works mainly electronically, but as with all businesses, there are still some costs incurred in these areas.

Newsletters - the cost of issuing newsletters and other electronic communications is minimal by the nature of them being electronic.

Registration Committee fees

The Registration Committee supports the work of the full Council and considers cases/applications between meetings so that the full Council can meet less often. The Committee's fees are covered under the registration fees paid by applicants.

Bank fees

Bank fees incurred are almost solely related to the cost of processing credit card transactions associated with annual renewals and the small number of other applications the Council receives throughout the year.

Information technology

This is one of the biggest cost areas for the Council due to the need to maintain the public register and accept applications for registration and APCs. The Council considered many IT platforms when it was being established and chose a mid-range IT platform in an effort to find a balance between keeping costs at a reasonable level, especially when establishment funding had not yet been provided by the profession and ensuring it could meet the Minister's expectations in terms of carrying out its core functions. There is always a balance to be struck between having a high-end system that needs less regular maintenance and has less glitches/issues but is expensive up-front and a less expensive system that does need regular maintenance/experiences issues. The Council believes it has struck the right balance for now but will review this in time.

Engagement with the Chinese Medicine Board of Australia (CMBA)

The Trans-Tasman Mutual Recognition Act (TTMRA) 1997 recognises Australian and New Zealand registration standards as equivalent and enhances the freedom of registered professionals to work in either country. An applicant who is currently registered and in good standing in Australia, is eligible to register in New Zealand. As such, one of the roles of the Council is to ensure that standards between our two jurisdictions remain equivalent, as far as possible. Yes, the Council will continue to engage with the CMBA annually and this will incur cost; however, these early years of regulation have necessitated more engagement than is likely to occur on a 'business as usual' basis going forward. The Council will keep the profession updated on any key projects or pieces of work which have the potential to impact significantly on APC fees.

Project: Development of restorative complaint processes

The Council will involve practitioners and stakeholders in the development of restorative complaint processes via public consultation. There is some preliminary work for the Council to undertake to further normalize complaints with the profession and ensure practitioners are open to engagement in such processes before this work can get underway. The Council will provide regular updates on this work via its various communication platforms.

Regular fee reviews

The Council is in its early days so it will be necessary over the initial years of regulation to review all fees imposed on a regular basis to ensure they are sufficient for the Council to carry out its responsibilities under the HPCA Act. Over time, the Council's aim will be to provide certainty of costs for practitioners from one year to the next.

The Council is committed to specifically conducting an annual review of APC fees in its first five years of operation. This process includes going through the Council's budget line by line and considering if there are alternate ways of doing things or different providers who can be utilised etc. in order to bring costs down. In addition, where any of the Council's estimated costs or calculations for a particular year do not eventuate and this results in a significant profit at year end, the Council will reduce APC fees in the following year to account for this. The Council will update practitioners and stakeholders on the outcome of such reviews once they have been conducted, and where any changes are proposed, a public consultation will follow (as has just occurred).

Reserve policy

The Council's Policy on Financial Reserves is available on the 'Fees' page of the Council's website located at www.chinesemedicinecouncil.org.nz.

Council decision

The Council considered consultation feedback at its meeting held on 1 December 2025 and decided on a way forward. The Council resolved to confirm the fees as proposed in the consultation document.

The Council published its 2026/27 APC fees in the NZ Gazette dated 10 December 2025. A link to the Gazette notice and a copy of the Fee Schedule can be found on the 'Fees' page of the Council's website. The Gazetted fees come into effect from **16 January 2026**.