

CONSULTATION POLICY

Purpose

This policy sets out Pharmac's formal approach to consultation. It aims to ensure that consultation is early, meaningful, fair, transparent, and consistent with legislative obligations, government expectations, and best-practice engagement principles. It applies to all formal consultation processes undertaken by Pharmac.

Alignment with strategic direction

Pharmac is committed to ensuring a healthier future, with you and for you. Formalising an approach to consultation helps achieve this vision allowing us to make better informed decisions together to deliver the best possible health outcomes.

Formalising a consultation policy that embodies best practice helps Pharmac to deliver on its strategic priorities to make informed choices and wise investments, resulting in timely access and delivery excellence.

Scope

This policy applies to all Pharmac staff involved in planning, delivering, or analysing formal consultation relating to:

- medicines and vaccines funding decisions
- medical device evaluation and procurement
- changes to the Pharmaceutical Schedule
- policy or operational changes that materially affect stakeholders
- any matter where Pharmac has a statutory, contractual, or legitimate expectation to consult.

This policy does **not** cover broader engagement activities, which are governed by Pharmac's Engagement Strategy. Planning for the implementation of this policy will be covered by Pharmac's Engagement work.

This policy also does **not** cover internal decision for example those pertaining to employment matters.

Definitions

Consultation: A structured, time-bound process to actively seek feedback from consumers, clinicians, suppliers, and other stakeholders to inform a specific decision or policy.

Engagement: Ongoing, relationship-based interaction that includes collaboration, co-design, and continuous dialogue. Consultation is one component of engagement.

Principles

Pharmac’s consultation practice is guided by:

1 Alignment to Legislative, Government Expectations and Other Pharmac Policy

Pharmac will meet all requirements under:

- Section 70 of the Pae Ora (Healthy Futures) Act 2022: Including consulting on matters relating to pharmaceutical expenditure and informing the public of decisions.
- Te Tiriti o Waitangi: Including active protection, partnership, and participation of Māori.
- The Health Quality and Safety Commission’s Code of Expectations: Including equity, co-design, lived experience, and resourcing for participation.
- The Code of Health and Disability Services Consumers’ Rights: Including respect, effective communication, and full information.
- Pharmac Equity Policy
- Pharmac Māori Responsiveness model.

2 Best-Practice Standards

Pharmac adopts international best practice, including OECD and WHO guidance, ensuring consultation is:

- early
- transparent
- inclusive
- accessible
- evidence-informed
- accountable.

When Consultation Is Required

Pharmac will undertake formal consultation when:

- a proposal has material clinical or commercial impact

- a medicine, vaccine or related product is being considered for funding for the first time
- changes in funding criteria that may significantly affect clinicians or patients
- a brand change is proposed
- a proposal is likely to be contentious or high-impact
- proposed changes to the Pharmaceutical Schedule
- on supply issues, if one has arisen from discontinuation, for example
- there is a legitimate expectation based on past practice or commitments.

Who We Consult

Pharmac will consult widely and inclusively, ensuring participation from:

- consumers, patients, whānau, and lived-experience groups
- high needs health groups
- pharmaceutical suppliers
- health professionals
- health professional bodies
- Health New Zealand and other health sector agencies
- any individuals or groups who have requested consultation updates
- other affected stakeholders depending on the proposal.

Pharmac will aim to ensure consultation reaches underserved and high-needs populations.

How Consultation Is Conducted

Planning

Each consultation will include:

- a clear purpose
- identification of affected stakeholders
- timeframes that allow meaningful participation
- accessible information in appropriate formats
- consideration of equity and barriers to participation.

Materials

Consultation documents will:

- clearly describe the proposal
- explain the rationale and evidence
- outline potential impacts
- ask targeted questions
- provide information on how to submit feedback.

Delivery

Consultation will be delivered through:

- publication on the Pharmac website
- direct communication to relevant stakeholders
- use of networks to reach high-needs groups
- additional targeted outreach where appropriate.

Feedback Handling

Pharmac will:

- carefully review all feedback
- consider changes where appropriate
- document how feedback influenced the decision-making
- ensure decision-makers receive a full summary of submissions.

Decision-Making and Transparency

Pharmac will:

- communicate decisions as soon as practicable
- explain how feedback was considered
- provide reasons for decisions, including clinical, commercial, and consumer considerations
- maintain transparent feedback loops
- publish a summary of consultation feedback and final decisions on its website.

This includes meeting obligations to inform the public under Section 70 of the Pae Ora Act.

Roles and Responsibilities

Board: Holds ultimate accountability for ensuring consultation obligations are met.

Chief Executive: Responsible for ensuring compliance and may delegate authority to determine when consultation is required, as per Pharmac’s Delegation Policy.

Implementation and review

Implementation of the policy will be progressed as part of Pharmac’s broader engagement framework implementation and as through the variety of mechanisms Pharmac undertakes formal consultation.

Owner(s)	Equity and Engagement Directorate		
Policy Reviewed	April 2026	Next Review	April 2029