

Introduction

This document provides an overview of the General Optical Council (GOC) discussion paper on its approach to setting registrant fees (April 2026). The full details for this consultation can be [found here](#).

It's important to note that the GOC is not consulting on fee levels, but on *how fees are structured, distributed and paid* across registrant groups. The consultation closes on 20 July 2026.

To supply feedback, you can either email your response via policy@abdo.org.uk or complete the short ABDO member survey – links for this will be shared in member email communications, or you can request this from membership@abdo.org.uk

You can also respond directly to the GOC via their consultation page.

Summary

- GOC registrant fees remain a major concern for **dispensing opticians (DOs)**, who report particularly low satisfaction with value for money.
 - The discussion paper explicitly recognises that **DOs cost less to regulate**, have **lower average earnings** and experience **higher early- and mid-career attrition** than optometrists.
 - Several options under consideration could materially **reduce fees for DOs**, but this would likely require **increases elsewhere** (e.g. optometrists or businesses). A range of reductions are presented in the paper, along with the associated impact on other registrants. For example:
 - a reduction of £50 in fees for DOs would result in optometrists and business registrants each paying +£15.71. A reduction of £100 would equate to others paying +£31.42 each
 - The consultation also raises broader issues around **equity, affordability, workforce sustainability, business regulation and payment flexibility**.
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Summary of the 13 consultation questions

Q1. Draft principles for setting registrant fees

What is being asked: Views on ten proposed principles that would underpin how the GOC sets fees (e.g. cost reflective, fair, affordable, transparent, stable).

Key issues and considerations:

- whether *cost reflectiveness* should outweigh *simplicity* or *ability to pay*

- how far fees should reflect **actual regulatory risk and workload**, which differs materially between registrant groups
 - whether the principles sufficiently reflect **workforce sustainability and retention**, particularly for DOs
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Q2. Overall position on differential fees

What is being asked: Whether the GOC should retain the current flat-fee model or introduce differential fees.

Key issues and considerations:

- flat fees are simple but can be perceived as unfair
 - differential fees could better reflect regulatory cost and earnings, but add complexity
 - this question sets the direction of travel for all later options
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Q3. Support for five differential fee options (options 1–5)

Respondents are asked to rate support (1–10) for each option and to comment.

Option 1 – Lower fees for dispensing opticians

Issues:

- strong evidence that DOs cost less to regulate (lower fitness to practice burden)
- potential negative impact on both relationships with optometrists and perceptions of the standing of the profession
- cost would be transferred primarily to optometrists and/or businesses

Option 2 – Higher fees for registrants with specialist qualifications

Issues:

- reflects advanced clinical scope and additional regulatory oversight
- risk of disincentivising post-registration qualifications
- specialist fees do not necessarily lead to substantially higher salaries
- future policy complications as newly qualified optometrists start to graduate with independent prescribing rights, depending on the university attended

Option 3 – Lower fees for newly qualified registrants

Issues:

- supports early-career affordability and transition into practice
- neutral with respect to profession, not role specific

- cost spread across all other registrants

Option 4 – More generous low-income discount scheme

Issues:

- builds on existing system and supports those with limited means
- does not reflect cost of regulation by role
- income-based schemes are administratively complex and less predictable

Option 5 – Lower fees for registrants on parental leave

Issues:

- supports equality and return-to-work retention
 - limited overall financial impact but some administrative burden
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Q4. Instalment payments for individual registrants

What is being asked: Whether the GOC should allow individuals to pay fees by instalments during the year.

Key issues and considerations:

- over half of registrants support instalment payments
 - requires legislative change and robust enforcement mechanisms
 - adds system costs likely to be passed on to registrants
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Q5. Balance between individual and business fees

What is being asked: Whether businesses should pay more, less or the same as individual registrants.

Key issues and considerations:

- businesses generate a higher proportion of regulatory activity than their share of fee income
 - risk of businesses deregistering if fees increase
 - possible impact on employers' willingness to continue paying individual fees
 - currently, not all businesses are required to register so there would be a disproportionate impact on those that are
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Q6. Size-based fee models for businesses

What is being asked: Whether business fees should remain flat or vary by size.

Key issues and considerations:

- flat fees favour large entities over practices that are individual companies, including independents and franchises/joint venture partnerships
 - size-based models may be fairer but are harder to administer
 - risk of unintended consequences, e.g. businesses deregister if they are currently registered voluntarily, or stop using protected titles to avoid having to register
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Q7. Metric for business size

What is being asked: Preferred basis for assessing business size (stores, staff numbers, turnover, or other).

Key issues and considerations:

- each metric introduces verification and enforcement challenges
 - turnover and staff numbers may not accurately reflect risk or regulatory burden
 - risk of unintended consequences, e.g. businesses reduce staff numbers
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Q8. Instalment payments for businesses

What is being asked: Whether businesses should be able to pay fees by instalments.

Key issues and considerations:

- strong interest, particularly from employers paying multiple individual fees
 - similar risks and costs to individual instalment model
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Q9. Consulting on costed plans and fees

What is being asked: Whether the GOC should formally consult on costed plans and proposed fees.

Key issues and considerations:

- increased transparency and engagement
 - limited practical influence given fixed and demand-led costs
 - risk of consultation fatigue
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Q10. Multi-year fee cycles

What is being asked: Whether fees should be set for multiple years in advance.

Key issues and considerations:

- greater predictability for registrants
 - risk of over-cautious fee setting in uncertain economic conditions
 - reduced flexibility for the regulator
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Q11–Q13. Welsh language considerations

What is being asked: Assessment of whether proposals affect the use or status of the Welsh language, and whether impacts could be mitigated or improved.
