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From:

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Sent:

05 April 2024 17:38

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Subject:

RE: CMA identifies multiple concerns in vets' market - consultation closes on 11 April

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Yes I think a market investigation would be a sensible way forwards. Having identified issues in the initial review I think that to not investigate more fully would be disingenuous. There are things that we, as a profession, perhaps need to change or take greater ownership of, while noting that some of the areas identified are not specifically under direct veterinary control, for example updating the Veterinary Surgeons Act to allow regulation of businesses rather than individual vets.

Specifically I agree with the report that there is confusion about the ownership of veterinary practices, either as a privately owned small business, in the traditional manner of vet practices, or part of a corporate entity, answerable to shareholders or other investors. Whilst the public could always ask the question the practices themselves could be more transparent.

This leads on to the question of perverse incentives and lack of competition in certain areas. I'm less sure if that is an actual problem but it certainly is a theoretical one, and further investigation would be good to help answer those points.

Regarding the overcharging for some medicines, it is my opinion that this may well be happening, but that often it is to cross subsidise other services, such as 24 hour availability and a reticence to charge appropriately for veterinary time to cover all the different facets of veterinary practice that add cost to a business - such as stores of medicines, diagnostic equipment, reception and other "non chargeable" staff, as examples.

In short I am happy with the proposed approach though question whether it is right to restrict this to household pets, rather than companions animals generally thereby including horses, which often are treated as pets, or even extended to include agricultural or food production animals as well.

Finally I would emphasise that the Veterinary Surgeons act is no longer fit for purpose as it does not allow the RCVS to regulate veterinary businesses, nor allied professionals offering animal health services which may lead to further confusion amongst the public.

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