

## **Dogs Trust response to CMA consultation on the proposal to make a market investigation reference into veterinary services for household pets in the UK**

As a dog welfare charity, caring for around 13,000 dogs per year, we work closely with the veterinary services market to help manage the welfare of dogs in our care, as well as owned dogs who we support through our outreach schemes, post-adoption support funds and emergency fund. Our Emergency Fund can provide a financial contribution towards urgent unexpected treatment for dogs in the UK where their owners are unable to cover the whole cost. Owners are usually in receipt of means tested benefits but might also be on a low income or experiencing financial difficulty for another reason. Our Together Through Homelessness veterinary scheme funds the veterinary care for dogs whose owners are experiencing or at risk of any form of homelessness anywhere in the UK. We work in conjunction with over 150 vet practices across the country where the owners we support can access free vet care for their dogs.

We highly value the support and dedication of all veterinary professionals we engage with, without whose support, we would not be able to help the number of dogs we do. However, the profession has been under a huge amount of pressure over the past few years. The difficulties experienced during the pandemic led to many veterinary professionals moving to non-clinical roles or leaving the profession entirely. Dogs Trust has experienced significant challenges in recruitment for our clinical roles. This is also evidenced by many of our associated vet practices offering a reduced level of service; specifically, there has been a reduction in the number of visits to our centres, and on occasion there is a difficulty (or long waiting lists) to accommodate appointments and surgeries at practices. Some practices have had to withdraw their services completely due to a lack of capacity to support our needs. This can negatively impact welfare if this reduced capacity leads to a delay in instigating appropriate treatment. A significant rise in pet ownership during the pandemic alongside those leaving clinical roles has increased pressure on the profession.

According to the most recent Consumer Prices Inflation data from February 2024, vet bill inflation is over 3 times higher than headline inflation (13.25% vs. 3.4%)<sup>1</sup>.

We see this reflected through continually high numbers of enquiries to Dogs Trust from dog owners needing to give up their dog. As a part of this process our Customer Support Centre records the reason given. Concerningly, the proportion of those that spoke to our Customer Support Centre explicitly referring to financial issues as the reason that they are looking to relinquish their dog increased by 266% between 2021 and 2022. It further rose by 235% between 2022 and 2023, more than a tenfold increase on 2021. Additionally, between 2022 and 2023, we also saw a 512% increase in those mentioning being unable to afford veterinary expenses in their handover enquiry.

We have also seen an increase in telephone requests for financial help, either via our emergency fund, or requesting assistance in paying veterinary bills, with a 55.9% increase between 2022 and 2023. This also increased by 41% by email in the same period and as of Q1 2024 remains roughly double the numbers in 2022.

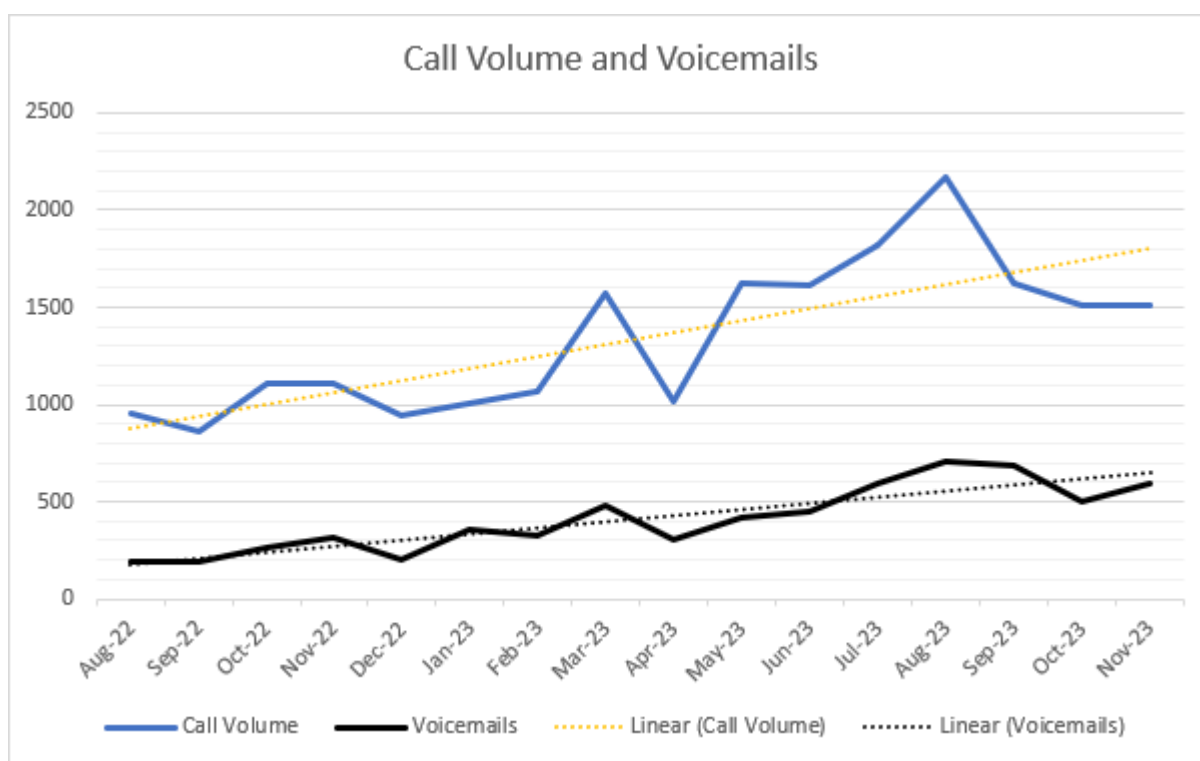
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<sup>1</sup> Dogs Trust internal research, based on CPI data and a method developed by Oxford Economics



In 2022, we had 297 applications for our Emergency Fund, of which 188 were approved. In 2023, we had 691 applications and 406 of these were approved. This year, to 8th April, we had already received 214 applications, with 120 of these approved. Where applications were not approved, owners may nor may not have been able to access veterinary funding from elsewhere.

The graph below details the increase in the overall number of calls to our Together Through Homelessness vet scheme between August 2022 and November 2023. It is important to note that the rising cost of veterinary care is one of a number of factors contributing to the rise in demand for our service, such as the overall increased cost of living and the rising levels of homelessness across the UK, which in turn is also influenced by the rising cost of living.



The situation with veterinary services costs has had, and continues to have, a huge impact upon our ability to care for and rehome dogs, especially when combined with the increased overhead cost pressures as a result of the pandemic and the spike in energy prices. Costs have increased in all aspects of our lives, which continue to have a knock-on effect on our service delivery. As dog owners have experienced rapidly rising costs in dog food and veterinary bills, this has resulted in a rise in relinquishment enquiries, causing our rehoming centres to rapidly fill up. The cost of looking after increasing numbers of dogs, often with complex behavioural challenges or in need of costly veterinary treatment, is having a serious impact upon our ability to accept further dogs.

Where owners are unable to afford veterinary care but don't want to or aren't able to relinquish their dog, we are concerned about the impact on dog welfare if there is a delay in seeking veterinary care, or



appropriate veterinary treatment is not being sought at all. We are also concerned about the impact on owners if they have to make premature euthanasia decisions for their dog. One of the key findings of the RSPCA's Animal Kindness Index was that there were 45,000 Google searches for 'can I give my dog paracetamol' in April 2023, an increase of 13% from April 2022<sup>2</sup>. We share the RSPCA's concern that this may be a result of owners trying to find cheaper alternatives to veterinary care for their pet, although this is potentially dangerous without a clinical assessment of the individual dog and could end up costing more in the long run.

To address the issues we are experiencing with the cost of veterinary services, Dogs Trust recommends the following:

- A market investigation reference should be launched by the CMA as soon as possible to further investigate, and take necessary action, on the veterinary services market for household pets.
- However, a differentiation should be made between the veterinary industry and the profession. Most vets working in practice will not be responsible for setting prices for veterinary services, nor will they benefit directly from increased costs.
- The scope of the market investigation reference should include a consideration of pricing structures - for example, we sometimes find the cost of a procedure in a first opinion practice can be more expensive than the same procedure undertaken at a referral centre. Appropriate pricing should take into account factors such as the expertise and experience of the surgeon and the facilities available to the patient, such as intensive nursing care and the presence of specialists in veterinary anaesthesia and analgesia.
- Further to this, there should be transparency and clarity around referrals. Referral might be within a practice, to another practice, or to a specialist referral centre. Guidance should be given on what qualifications, skills and experience a particular vet has, and what constitutes a specialist.
- There is also a need to highlight pathways for contextualised care. Within general practice, different approaches may be taken based on the balance of feasible treatment options, including consideration of the cost. Contextualised care refers to an approach to cases within the context of their surroundings, which includes input by the owner. The partnership between the client and the vet is focused on maximising the welfare of the patient and we would like to see more emphasis on this approach. A contextualised care approach lends itself to offering a client an appropriate range of treatment options where applicable. There is a fear amongst some professionals of being sued if they do not offer so-called 'gold standard'. Welfare should be the primary goal; 'just because we can does not mean to say that we should'.
- The Veterinary Surgeons Act 1966 is in urgent need of review and should be updated by the Government as soon as possible. This would enable Registered Veterinary Nurses, an under-utilised skill, to take on a broader scope of procedures, to take account of paraprofessionals, and to give clear definitions for terms such as 'referral' and 'specialist'.
- Out of hours provision should be reviewed. Out of hours services are now often centralised. Whilst this facilitates the ability to provide dedicated out of hours staff rather than an 'on call' system, it also means that sick patients are often transported to alternative premises for overnight / out of hours

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<sup>2</sup> <https://www.rspca.org.uk/whatwedo/latest/kindnessindex/keyfindings>



care. Furthermore, those requiring out of hours emergency treatment have significant travel times in order to seek veterinary care. Both of these have significant welfare implications.

In summary, we have significant concerns the affordability of veterinary care is an ongoing and escalating issue with more and more pet owners unable to afford to care for their pet. This is leading to welfare issues from delayed treatment, and greater pressure on an already stretched charitable sector.

We would be keen to meet with the CMA to discuss the impact of increased costs for veterinary services in more detail, or to contribute to the market investigation reference if this is taken forward.

