



11 April 2024

Dear [REDACTED]

I am writing as [REDACTED], the UK regulatory body for veterinary surgeons and veterinary nurses.

The RCVS recognises the concerns raised by the Competition and Markets Authority (CMA) review of veterinary services in the domestic pet market, and appreciates the strength of feeling identified in those responding to your initial Call for Information (CFI). As such we agree that a Market Investigation Reference (MIR) may be an appropriate next step.

We would like to take the opportunity to set out our thoughts on the preliminary concerns identified by the CMA:

Legislative reform

We welcome the CMA's provisional view that there is a need to modernise the veterinary regulatory framework through new legislation, something we have been calling on government to do for some time. In particular, mandatory practice regulation is a key part of the package of legislative reform that we are seeking, and we have already formed a working group to flesh out the detail in preparation for government time being available to consider a new Act. We would encourage the CMA to support the RCVS's recommendation that we should be able to regulate practices as well as individual veterinary surgeons and veterinary nurses.

Our other priorities for new veterinary legislation include:

- Regulation of the vet-led team, which will provide greater assurance for animal owners and keepers about the standards to which groups of people supporting the health of their animals will be held;
- Review of our complaints and disciplinary system, to give a more modern fitness to practise model, which will better support the public interest as well as being proportionate for veterinary professionals; and,
- Bolstering and developing the role of veterinary nurses, which will bring benefits to animal owners through a greater range of services being offered in both primary care and referral settings.

Pricing and transparency

Whilst it is not in our remit as a professional regulator to influence business structures, local markets or price levels, we do recognise the CMA's concerns over clarity of medicines supply options and pricing information. Our current guidance to the profession is already largely aligned with the CMA's recommendations, and seeks to ensure transparency and clarity, but we know there is always more we can do to highlight these requirements to both the professions and the animal-owning public.

To this end, we set up a Public Advisory Group in 2023 to help support and inform our work from a consumer perspective, a current key workstream of which is developing improved online advice to help animal owners get the best out of their interactions with their veterinary team.

We have also asked our Standards Committee, the governance group that oversees our Codes of Professional Conduct, to review, consolidate and streamline our current guidance for vets and vet nurses to help those working in clinical practice to better understand the requirements.

We would note that the medicines market is carefully regulated by the Veterinary Medicines Regulations and other legislation, such as the Supply of Veterinary Medicinal Products Order 2005, and is complex and inter-related. It will be important to ensure that in any push for lower prices, there is no unintended impact on either practice sustainability, and thus access to care, or the vital pharmaceutical research and development pipeline.

Mental health concerns

We are grateful to the CMA for highlighting mental health issues in the veterinary professions, including the high suicide rate. However, we are very concerned to note that, since the publication of the CMA report, there has been a worrying spike in abusive behaviour and harassment by some animal owners towards vets, vet nurses and practice colleagues.

We feel that it is important to remind animal owners that the vast majority of vets and vet nurses are not directly responsible for business decisions within their practice environment or able to influence them, and that any concerns would be best directed either to those making the decisions or, better still, submitted as part of the CMA's upcoming investigation.

We do also recognise that the CMA received 11,000 submissions from members of the veterinary team, who may welcome the CMA's intervention, albeit not the immediate negative reaction from their clients.

Access to care

We note that one possible option that the CMA could pursue would be targeted structural remedies (for example, divestments of certain businesses or parts of businesses). We would ask that when considering this the CMA keeps in mind the potential impact on access to care if some businesses are compelled to put practices for sale but do not find a buyer. While we note that the majority of areas of

concern to the CMA are neither remote nor rural, some businesses may be subsidising those marginal practices centrally, so there may be a potential impact not only in the area targeted for change.

RCVS initiatives

We recognise that your inquiry will take some time; in the meantime we will continue with the measures already being undertaken by the College as outlined in my letter of 24 March 2024 and highlighted above, namely:

- A working party to develop our proposals for mandatory practice regulation.
- Developing improved online advice for animal owners/keepers via our new Public Advisory Group (PAG).
- Taking a thematic approach to consolidate and amplify our existing guidance.

Yours sincerely

