

Response to Consultation on the proposal to make a market investigation reference into veterinary services for household pets in the UK

We write as members of The Association of Private Pet Cemeteries and Crematoria (APPCC), an organisation of Independent Pet Crematoria, Pet Cemeteries and Pet Funeral Arrangers. <https://appcc.org.uk/>

The overriding principle of the Association is to ensure our members provide services for pet owners that are fully described so there can be no doubt they get the service they expect. To do this we set a Code of Practice that sets out strict conditions on the handling, storage and procedures for a pet funeral service. This is backed up through an inspection system by an outside agency that also ensures we comply fully with the Consumer Protection Against Unfair Trading Regulations in all our marketing literature. <https://appcc.org.uk/the-association-of-private-pet-cemeteries-and-crematoria-consumer-code>

We agree that the CMA's provisional analysis of the market is accurate and the suspected features of concern in the supply of veterinary services and related services for household pets in the UK are correct.

We have 35 members across the UK <https://appcc.org.uk/find-a-member> who are in support of an MIR by the CMA.

Introduction

Since the corporatisation of the veterinary market, we have seen local independent first opinion practices and referral vets that were offering our services cease using independent pet crematoria due to the new corporate chain either having their own in-house cremation service or having a lucrative national contract with a crematoria chain.

Pet cremation is an unregulated market. Inspections by APHA are only concerned with basic incineration. The only controls on how a cremation is carried out come from the APPCC Code (for members) and the Trading Standards Regulations. In both these cases the guidance is often ignored in favour of cutting costs. This is often the case with veterinary services but may equally apply to those arranged directly with pet crematoria

The expectations of pet owners who have a cremation service may vary considerably. Some may be content with a service that others may find undignified and upsetting. This makes it impossible to correctly sell cremation services unless accompanied by a detailed description of how the pet will be handled. This is notably absent from the majority of pet cremations sold through veterinary surgeries or even by many independent crematoria. You will see from our Code of Practice that we set out simple, specific conditions to ensure a level of dignity and service that will be acceptable to the vast majority of pet owners.

Concerning cremation services provided by veterinary practices there is insufficient clarity in the provision of

(a) The actual services provided

- Disposal, Communal cremation and individual cremation should be clearly differentiated and described. Our Code of Practice only allows members to use the term cremation for a service that meets our conditions. Sadly, the majority of “communal cremations” offered through vets are no more than a disposal.
- The storage and handling of pets while at the vet practice, during transportation and at the crematorium. The majority of services would not meet our Code for transportation as they involve piling sometimes hundreds of pets into lorries alongside clinical waste.
- The actual procedures for a cremation, in particular how contamination of ashes from other pets is prevented during individual cremation.
- The timescale involved in the collection, cremation and return of ashes.
- Where pets are being sent for cremation, e.g., pets from The Isle of Wight being sent to Surrey without the owner’s knowledge.
- We believe that if accurate details were given then many pet owners would choose a different service to the one offered by the vet.
- The RCVS, in its guidance “Setting Standards” states

9.7 Pricing practices should comply with the Consumer Protection from Unfair Trading Regulations 2008 and other consumer protection legislation, and should not be false or misleading.

9.8 Veterinary surgeons should be open and honest about fees for veterinary treatment. Clients should be provided with clear and easy to understand information about how fees are calculated and what it is they are being charged for. Clients should be furnished with sufficient information about the fees associated with treatment to be in a position to give informed consent to treatment.

<https://www.rcvs.org.uk/setting-standards/advice-and-guidance/code-of-professional-conduct-for-veterinary-surgeons/supporting-guidance/practice-information-and-fees/>

This requires the above conditions to be met. This is not happening in the majority of veterinary practices.

(b) The financial incentives for vets to provide certain services

- Vets fall into the category of “trusted advisor” by virtue of
 - (a) Authority of their profession
 - (b) Respected charities such as The Blue Cross, Animal Welfare Trust advising people to ask their vets about pet cremation services.
- As such they need to clarify whether they are working from an independent basis or whether they are (a) agents for or (b) owners of the third-party service providers.
- Clients need to understand whether the recommendation of a particular service means the vet practice will receive a financial benefit, either a commission or a large profit margin. For other trusted advisors the matter of third-party introductions has caused problems as seen in financial services, legal services and more recently motor sales credit services.
- As the provider of euthanasia for pets, vets have the first opportunity to advise on the cremation, burial or disposal of pets. Pet owners are placed in a position of having to make a stress purchase. They need time to make an informed decision. Stress purchases leave consumers liable to take the first advice offered, particularly when from a trusted advisor such as a vet.
- In many vet practices the sale of cremation services takes place just before or after the euthanasia. Often pet owners are asked to provide their cremation choice on the vet’s euthanasia consent form.
- We note a section from the Works and Pensions Select Committee on Support for the bereaved that equally applies to this situation:

31. SFFP applicants are in the position of trying to navigate this landscape of drastically differing costs and devalued state support, all whilst suffering a bereavement. Marie Curie told us

funeral purchases are made at a highly emotional and often distressing period. Bereaved people have compared funeral arrangements to ‘distress purchases’ when normal market behaviours, such as shopping around for the best price are absent, leading to increased costs.⁵⁰

We have also been told that a funeral is the “last thing that a relative or friend can do for their loved one”,⁵¹ and so people feel under pressure to spend more than they may be able to afford. People are also under pressure to arrange the funeral quickly. We have been told that families will “raid every pot they can to get a funeral over, due to the shame of knowing their loved one is lying in a mortuary”.⁵²

32. DWP acknowledged that it is “often the case that people simply go into the local [funeral home] that they have seen, rather than shopping around.⁵³ The Office of Fair Trading have said that this unusual consumer behaviour “acts as a dampener on competition”, and that people are “vulnerable to unfair trading practices”.⁵⁴ The Institute of Cemetery & Crematorium Management said that people should be encouraged to shop around for the most affordable funeral and not feel guilty about questioning funeral costs.⁵⁵

(c) The ownership of businesses providing services

- If a veterinary practice is linked to crematoria by ownership, either direct or linked, this will be the over-riding factor in the provision of a cremation service.
- Of the 6 corporates you list 3 own pet crematoria and the other 3 that do not own pet crematoria send pets to the 3 that do, preventing any form of competition from independent pet cremation services.
- The ownership of pet crematoria by the large veterinary corporate groups clearly has an impact on our independent businesses. The ownership of these crematoriums is often not declared (see those owned by the CVS group) even on their websites and they appear to be independent. The only sign is the registered office address at the bottom of the page that is the same on all the sites. Whilst those under the banner of PCS (Pet Cremation Services) show their logo they make no mention of being part of the Vet Partners Corporation.
- Veterinary staff are instructed to use their preferred cremation service with the risk of disciplinary action for not observing this. We know from personal contacts and observing conversations on social media that many veterinary teams are deeply unhappy about this. By observing instructions, they have to compromise their own professional integrity.

Summary

Your CFI indicates a quarter of respondents said that being offered a choice of pet cremation service wasn't important to them at the time. It is our submission that this is because of a complete lack of transparency and the respondents were not aware of the way their pet was stored, handled, transported and cremated. We believe further questions should be put to the consumers and that the results will show that these are important factors for pet owners that would lead them to choose a different provider

We would urge the CMA to further investigate how pet cremation services are currently sold by vets, pet crematoria and third parties. We believe there should be a further CFI to gain a better understanding of how pet cremation services are currently being sold and what key facts are being given to or omitted from the information provided to the consumer when choosing a pet cremation service.

Understanding what information is important to pet owners is crucial to improving the sale of after death care services.

We also believe the CMA should encourage whistleblowing from both veterinary and crematorium staff regarding the procedures they are told to

follow regarding the sale of pet cremation services as well as investigate the current practices in place at both FOP and referral vets.

We would value the opportunity to assist the CMA in any way possible to help improve the sale of after death services in the UK. We have seen cremation prices rise and standards fall since the corporate veterinary practices took a large share of the veterinary market. When you consider that the 6 largest veterinary groups only offer the services of the 3 largest pet crematoria groups in the UK (owned by 3 of those corporates) it puts into perspective the way that competition and choice has been removed from the consumer.

For your information we include below examples from our members outlining the problems in dealing with veterinary surgeries over cremations.

[]