



## Assistance Dogs UK

A voluntary coalition of assistance dog organisations

# Assistance Dogs UK (ADUK) response to CMA Issues Statement regarding Veterinary Services for Household Pets in the UK

## Summary

ADUK are very pleased to see the scale and scope of the Issues Statement, and it was impressive to note the number of people spoken to as part of the consultation including not only vets, nurses, charities but also businesses such as crematoria and labs as well as the general public.

We appreciate the confirmation that assistance dogs will be included as part of the investigation, recognising their unique bond with their owners and the added financial and practical challenges faced by disabled people interfacing with the veterinary sector.

Overall we believe that the Issues Statement is comprehensive and appropriate, and would like to add a small number of comments and additional information which we hope will assist moving forward.

## Comments

1. We note and agree with the points made in section 113 regarding quality and ethical considerations around treatment, and in 122 regarding the animal welfare implications of potential remedies. We believe that these are areas that need considerable focus in the next stage of the review. Whilst it is undoubtedly necessary that pricing of options be transparent, and we agree fully with your comments on this, it is still possible that inexperienced owners will feel that they should take the more expensive option for the welfare of their dog even if this is not the optimal decision. Equally, it is possible that, if decisions are driven purely by price, they will not necessarily result in optimal welfare either. It is essential therefore that the remedies around 'helping people make good choices' take welfare implications into account, and we would suggest some discussions/round tables with animal welfare experts as part of the investigation. ADUK is able to assist with this, as we have many such experts within our membership.
2. Clearly pricing is a huge focus of the review, and we support this fully. We note and agree with the plans around 'Profitability' in section 107, and the questions about pricing in 103-106. Our members have noted repeated price increases over very



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short periods of time, with no associated changes in quality of service, and excessive costs for the most routine of services. We would be able to provide further evidence on this as noted in section 105. We are pleased to see that potential remedies include placing limits on the prices that can be charged, and would urge that this includes routine services such as vaccinations, worming and prescription charges which are spiraling rapidly. Noting the significant number of charities that operate within the animal welfare sector, we wonder whether things such as Service Level Agreements and Pricing Agreements (which could include 'no charge prescriptions' for example) could also be considered for the sector as part of the remedies.

3. You note in point 31 that the large corporate groups have to varying degrees acquired businesses that sell related services such as pharmacies and labs. It is our experience that some groups are restricting their vets to prescribing drugs that they either manufacture directly themselves or through partners with whom they have commercial arrangements. This means that the customer has no choice but to buy the drug from the veterinary practice - thus removing openness and competition, as well as reducing clinical freedom for vets to prescribe the most cost effective solution. We would suggest that this is an addition to your points around 'incentive and ability to keep related services.....' (point 75 onwards) and needs to be considered in this context.
4. Whilst it is mentioned several times, we have significant concerns about the way in which Out of Hours (OOO) services are being managed, and would ask that remedies be considered as part of the review. As we mentioned in our earlier submission, our clients often have mobility issues, and the consolidation of the OOO services is causing major issues. We understand that first opinion vet services do not necessarily wish to offer OOO services whether or not they are corporately owned, but we would welcome a discussion on whether any remedies around OOO accessibility and pricing can be found.
5. You mention pet insurance in point 19, and we are pleased to see that this will be considered in terms of its role within the market. We are seeing escalating insurance costs, increased exclusions and considerable challenges around making claims, and this is in part a result of the pricing changes in the veterinary market. Again ADUK have a number of people who deal with insurers, and would be pleased to assist with this aspect of the review.
6. We agree that the Veterinary Surgeons Act needs urgent reform and do not believe that the voluntary PSS offers adequate protection to consumers. We are very concerned about the 1999 amendment to the Veterinary Surgeons Act regarding ownership of practices by non-vets; this gives an expectation that the organisation will appoint a senior veterinary surgeon to give appropriate professional direction, but we do not believe that this is working in practice or that the RCVS has sufficient powers to enforce non-compliance if it felt it necessary to do so. We therefore are in



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strong agreement with the need for the Act to regulate practices as well as individuals, and would definitely like to see this included as a remedy. We assume that this is covered in 143 and 144.

### **Conclusion**

As discussed, ADUK are keen to assist with the investigation and exploration of potential remedies. We have suggested that we could host some 'round table' discussions at one or more of our charity locations, and can bring together relevant experts on the various topics under review. This could include, if helpful, some assistance dog owners who could contribute their direct experiences and thoughts. We have also suggested other bodies who could contribute in a similar way, most notably The Association of Dogs and Cats Homes, and The Association of Charity Vets. We look forward to working further with you on this, and to helping with the development of remedies.