



## **Dogs Trust comments on CMA Issues Statement July 2024**

As a dog welfare charity, caring for around 13,000 dogs per year, Dogs Trust works 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.

While we rely on local first opinion practices to provide an experienced Veterinary Surgeon and use of their clinic facilities, Dogs Trust also employs Registered Veterinary Nurses at each of our 21 UK rehoming centres. There is also a central support team consisting of 12 Veterinary Surgeons and 8 Registered Veterinary Nurses. With welfare at the core of any decision these teams make on behalf of the dogs we care for, we would like to see a greater emphasis on welfare in the issues and remedies the CMA have identified.

### **1. Pet owners might not engage effectively in the choice of the best veterinary practice or the right treatment for their needs due to a range of factors including a lack of appropriate information**

The CMA considerations under this theory of harm are heavily focussed on the cost of treatments which, while this is central to the enquiry, putting emphasis solely on cost could encourage “vet-shopping” by pet owners. This has the potential for individual pets to lose the continuity of care which is key to the successful management of long-term conditions and only possible with a consistent and systematic approach. Price comparison might be appropriate for some services such as preventative treatments but for more specific chronic conditions this could lead to compromised welfare and potential harm of conflicting treatments being administered concurrently if the pet owner fails to disclose details of their other practice/s.

We would also like to express concern at the examples of innovation in this area, listed as development of lower cost or advanced treatments which could lead to a degree of experimentation within treatment options. Greater emphasis should be placed on the improvement of the approach to contextualised care considering all circumstances of the pet and its owner and the appropriate treatment pathways available to them. This means that all treatment options should be discussed, with their relative risks or merits. All treatment decisions at Dogs Trust consider the ability of the individual dog to tolerate the proposed treatment and recovery period, the resources available to support this and the predicted outcome, which includes quality of life. For example, in a case with disease affecting multiple joints and each joint having a surgical treatment option, we might consider the many months or years of surgical procedures and recovery periods outweigh the benefits and elect for conservative management or in severe cases, euthanasia, to protect the dog's welfare.

It is important that cheaper treatments are not automatically portrayed as worse options, the emphasis must be on choosing the right option for that pet and owner in their circumstances. For example, a complicated limb fracture might be better served by amputation than complex repair. Pet owners can be influenced by treatment options seen on TV and social media and feel that if they do not elect for the most advanced option, they are not doing the best by their pet.

Further to the importance of choice for pet owners, we believe better clarity is required around the definition of referral. There should be a distinction between referral within the same practice to a colleague with a special interest or advanced certificate, referral to a visiting clinician (and what their qualifications are) and referral to a dedicated centre with advanced facilities, specialist nursing staff and board-certified specialists in their field of veterinary medicine. The advantages and disadvantages of each should be discussed with pet owners in the context of the treatment their pet requires. For example, the convenience of in-house treatment by a specialist in the case of a day procedure versus the facilities for aftercare at a dedicated referral centre when longer hospitalisation is required. When comparing estimates for procedures for dogs in our care, we have been surprised to find the costs can be the same or even less when the treatment is carried out at a dedicated referral centre.

In the potential outcomes the suggestion of price comparison tools should not be restricted to only the costs and range of services offered by a practice. It is important to also distinguish between the additional qualifications of the attending clinician and RVNs (and provide clear explanation of these), whether the practice is accredited by the RCVS Practice Standards Scheme or have elected to apply for Dog Friendly and/or Cat Friendly accreditation. There are many factors that influence the performance of a practice, such as out of hours provision, consultation lengths and quality of facilities. With the emphasis on cost alone, we are concerned savings will be made at the detriment of the standard of care and therefore welfare, for example employing unqualified staff.

**2. Concentrated local markets, in part driven by sector consolidation, might be leading to weak competition in some areas**

Dogs Trust tenders for veterinary services by approaching all veterinary practices local to a rehoming centre. While there are many criteria we look for in this relationship, as a charity, pricing must always be considered and in regions where there are many practices belonging to the same large corporate group, this can reduce the possibility of achieving competitive pricing. It can also be a barrier to practices applying to work with us if the relationship is not viewed by the group to be profitable.

**3. Large integrated groups might have incentives to act in ways which reduce choice and weaken competition**

As a large organisation with a team of employed veterinary professionals scrutinising the veterinary services we use, Dogs Trust can liaise directly with specific referral centres, crematoria and laboratories. We are not bound by the first opinion practice we work with to use specific businesses but do feel this is an important area for the CMA to investigate due to the significant range in facilities, services and costs available to consumers. Conversely, pet owners may not be fully aware of the referral options available to them should it be necessary. As discussed above, transparency in the qualifications, services and relationship to the first opinion practice is paramount to ensure the client can choose the most appropriate route for their pet.

**4. Pet owners might not engage effectively and might lack awareness of their options when a pet dies and, as a result, might be overpaying for cremations**

Dogs Trust has a contract with a specific pet cremation company and liaises directly, rather than via the first opinion practice. As individual pet owners ourselves we can understand that many may not wish to be offered a choice of service providers or to source their own at this distressing time. We do, however, believe it is important that the range of services offered by the chosen supplier are explained. For example, group versus individual cremation, and the choice of ashes being returned in a scatter box should be explained alongside the more

expensive option of a wooden casket or keepsake. Practices should be encouraged to explain the options and the associated costs.

A further point of investigation for the CMA to consider is the cost associated with euthanasia of pets. We have seen an increase in pet owners approaching charities such as Dogs Trust for financial support for euthanasia in a range of circumstances. The RCVS Code of Professional Conduct requires veterinary professionals to “ensure the health and welfare of animal committed to their care” and where euthanasia is delayed due to lack of funding, this is a significant welfare concern.

#### **5. Pet owners might be overpaying for medicines or prescriptions due to a range of factors including a lack of awareness of their options**

Dogs Trust has seen the cost of written prescriptions rise significantly in recent years and would welcome review of both the pricing and duration of prescriptions. In 2019 Dogs Trust began supplying medication to adopted dogs on our supported veterinary schemes via our own in-house pharmacy, allowing us to significantly reduce our costs using the strength of the size of our organisation to negotiate discounts on medications (and to mitigate the mark up charged on medicines). Smaller charities and independent veterinary practices will not have the same buying power.

We rely on the attending veterinary practices caring for the dogs serviced by our pharmacy to authorise prescriptions for us to supply the medication. Dogs Trust covers this prescription charge which can reach up to £45 (with a range between £7.50 and £45) - some practices charge this per item. Additionally, the duration of the prescription impacts the cost-saving for pet owners. When a dog's condition is stable and it is likely to remain on the same medication for its lifetime, the benefit of a written prescription to source medication elsewhere (in this case, Dogs Trust pharmacy) is reduced if it must be requested, and paid for, each month. In some cases, the cost of the prescription can reduce or even remove the benefit of our reduced medication costs for the adopter.

While we support pet owners having the choice to use an online pharmacy to source their pet's medication, we believe it must continue to be under the direction of their primary vet. Under the current regulations, medication can only be prescribed by a veterinary surgeon following a clinical assessment. This is important to ensure appropriate treatment choices for individual pets with due consideration of all known health factors.

With regards the use of generic medications, under the cascade vets are not permitted to prescribe these if there is a veterinary licensed alternative. It is important that owners are not encouraged to self-diagnose and medicate their pets; medication should only be administered following a veterinary clinical assessment (be it physical or otherwise). To not do so is a breach of the Veterinary Surgeons Act. Furthermore, there is a risk of serious harm if human generics are administered without veterinary advice. For example, we have seen a significant rise in pet owners researching the use of human generic paracetamol as an alternative to veterinary prescription pain relief. While this is usually safe in dogs at specific doses, it can cause severe toxicity and death in cats.

An additional consideration is that whilst we understand the significant investment required to produce licensed animal-specific pharmaceuticals, there have been a number of instances where a licensed product has been introduced following the successful use of a generic over a number of years. This has resulted in the obligation under cascade to use a much more expensive version of the same active ingredient. For example, fluoxetine has been a widely used treatment to facilitate behaviour modification plans. The introduction of Reconcile (the animal licensed product) has increased the cost of this treatment for a 30KG dog threefold

from £16 per month to over £48 per month. The costs here are without any additional mark up.

**6. The regulatory framework is outdated and may no longer be fit for purpose and may currently be operated in a manner that does not facilitate a well-functioning market.**

Dogs Trust fully supports the suggestion to review the Veterinary Surgeons Act 1966 as the current framework is outdated and no longer fit for purpose. It would benefit animal welfare and the profession as a whole to review and extend the role of Registered Veterinary Nurses, alongside making this a protected title. These are highly qualified individuals who could do so much more to support and enhance animal health and welfare. The combination of the UK's exit from the EU, the Covid-19 pandemic and the huge rise in pet ownership has caused a significant shortage among all veterinary professionals and animal welfare organisations have difficulty offering desirable roles in such a competitive landscape.

We would also like to see veterinary paraprofessionals such as veterinary physiotherapists brought under the Veterinary Surgeons Act. Regulation of these important adjunct therapies would give greater confidence to veterinary surgeons to delegate treatment of their patients and better guidance for pet owners to choose an appropriately qualified therapist.

Our associated veterinary practices have found it harder to provide the level of support our rehoming centres require due to their own over-subscription of clients and staffing difficulties; in some cases, they have withdrawn from our working relationship altogether. If our associated Vet Surgeons could delegate tasks to the Dogs Trust employed RVN and Physio teams legally and confidently, it could ease the strain and support the welfare of dogs in our care. Closely regulated use of telemedicine could also improve this working relationship.

### **Outcomes**

- Pricing
  - It might be appropriate to consider pricing structures in line with the facilities and services offered, along with skills, experience and additional qualifications of those providing the treatment.
- Profitability
  - The Dogs Trust Pharmacy was created to reduce medication costs to the charity – in the investigations into mark-up on products and services, medication costs will provide a useful comparison.
  - In recent years, the cost of professional fees have increased to reflect the services offered, historically mark-up on medicines was a means to moderate professional fees. Although professional fees have increased, there has been no reduction in mark-up on medicines.
- Choice, innovation and quality
  - Quality Improvement to improve clinical outcomes could be better implemented and measured in the veterinary industry. RCVS Knowledge has some centralised auditing tools such as the National Audit for Small Animal Neutering (NASAN) and the Canine Cruciate Registry (CCR) which provide useful data on complication rates. We recommend the CMA review these as part of their investigation.
  - Additional qualifications would be a more appropriate measure than years of clinical experience.
  - RCVS PSS accreditation is a better indicator of overall service quality.

### **Follow-up**

Dogs Trust would be happy to provide representatives to meet with the CMA to discuss the ongoing investigation further.