

Competition and Markets Authority  
The Cabot  
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London  
E14 4QZ

**By Email (vetsMI@cma.gov.uk)**

26th July 2024

Dear CMA

**Veterinary Services for Household Pets in the UK – Issues Statement | Confidential Response by Vet-AI Ltd (Vet-AI)**

1. We refer to the Issues Statement published by the CMA in the above investigation on 9 July 2024, and to our response dated 11 April 2024 to the CMA's consultation on a proposed market investigation reference.
2. We welcome the CMA's decision to launch the investigation, and moreover the CMA's focus on regulatory barriers impeding the development of alternative and innovative business models such as telemedicine (per paragraphs 98, 109 and 112 of the Issues Statement).
3. We support fully the CMA's proposal that appropriate remedies could include recommendations to regulatory bodies and government concerning changes to the regulatory framework, including amendments to the RCVS Code of Professional Conduct and/or associated guidance (paragraph 143 of the Issues Statement). We also agree that it would be helpful to explore whether the development of comparison tools and open data solutions could facilitate the growth of telemedicine (paragraph 144(c)).
4. We do not intend to repeat the contents of our letter of 11 April 2024. We consider that our submissions remain relevant given the confirmed scope of the investigation. We make one further observation, by way of example, on how regulatory barriers are impeding unnecessarily the development of telemedicine. In particular, the new RCVS guidance on "under care", which came into effect in September 2023, provides as follows:

*[...] given the importance of minimising the development of resistance to antimicrobials and anthelmintics, and minimising the potential negative environmental impact of antimicrobials and antiparasitics: [...] A physical examination is required at the time of prescription in all but exceptional circumstances where a veterinary surgeon prescribes antibiotics, antifungals, antiparasitics or antivirals for an individual animal or group of animals that are not production animals, farmed aquatic animals or game. Veterinary surgeons should be prepared to justify their decision in cases where antimicrobials are prescribed without a physical examination and record this justification in the clinical notes.*

(['Under care' - new guidance](#); paragraph 4.17(a))

5. The effect of the guidance in practice is to preclude the remote prescription of antimicrobials. There is, however, no scientific evidence that such measures would reduce the risk of antimicrobial resistance. In fact, in Vet-AI's clinical study on remote prescribing, we saw far lower use of antimicrobial medications than is reported at in-person veterinary clinics. In addition, RCVS decided to include all parasiticides in the classification of antimicrobials. In veterinary medicine almost all parasiticides are used to treat worms, fleas, lice, ticks and mites, none of which are microbes. This has meant that veterinary practices have a monopoly on a group of parasiticides called Isoxasolines, which provide the most effective cover for prevention of infestations of parasites in cats and dogs, as all Isoxalolines in the UK are POM-V medicines. This in turn restricts pet owners' access to the safest and most effective parasite controls for their pets. In most countries outside the UK, Isoxasolines are freely available as over the counter products or can be prescribed by Suitably Qualified Persons, having been demonstrated to be safe and effective.

6.



7. Finally, we emphasise our willingness to assist the CMA, by participating in hearings, roundtables and other discussions. We are also prepared to provide evidence that the CMA considers will be useful, including, for example, the following materials referred to in our letter of 11 April 2024:

- (a) 2019 clinical trial manuscript, setting out evidence that vets can issue and diagnose, as accurately, remotely, as vets in-clinic for dermatology cases in dogs.
- (b) 2021 manuscript, detailing the results of a clinical audit of POM-V/POM prescriptions by remote consultation via Vet-AI's Jorii app.
- (c) Information on the effect of the current regulatory conditions on the costs for pet owners of remote versus in-person practice consultations.

Yours faithfully

**Vet-AI Ltd**