

To whom it may concern
Competition and Markets Authority

27 February 2025

Royal Veterinary College (RVC) response to The Competition and Markets Authority's (CMA) market investigation into veterinary services for household pets

The RVC welcomes the opportunity to respond to the CMA Working Papers issued on 6th February 2025. We set out below our comments at this stage to the Preliminary Concerns that have been raised.

About the RVC:

The RVC is the UK's largest and longest established independent veterinary school and is a Member Institution of the University of London. Ranked as the top veterinary school in the world in the QS World University Rankings by subject for the last four years, we are one of the few veterinary schools in the world that hold accreditations from the RCVS in the UK (with associated recognition from the AVBC for Australasia, the VCI for Ireland and the SAVC for South Africa), the EAEVE in the EU, and the AVMA in the USA and Canada. The RVC offers undergraduate and postgraduate programmes in veterinary medicine, veterinary nursing and biological sciences with 88% of our research rated as internationally excellent or world class. We provide animal owners and the veterinary profession with access to expert veterinary care and advice through our teaching (referral) hospitals and first opinion practices in London and Hertfordshire.

Feedback on Preliminary Concerns:

Page 6, 1.10 (a) "Consumers face difficulties in making informed choices about the services they buy. There appears to be limited information available to pet owners about price, options available, quality of services and (in some cases) ownership of vet businesses.

We acknowledge the need for proactive, transparent communication and recognise our role in ensuring that this is positively taught to our students.

Page 8, 1.10 (j) "We are concerned that the regulatory framework does not help drive competitive processes and good consumer outcomes in the way we would expect in a well-functioning market. It does not appear to result in consumers having relevant and timely information on price, quality and treatment options that helps them engage with the market and make informed decisions and keep prices at a level one might expect if the market is working well.

We note the contents of the Working Paper relating to regulatory reform and are broadly supportive particularly of the proposals relating to development of veterinary nursing. We would further note they broadly align with previous work conducted by the Royal College of Veterinary Surgeons Legislation Review.

Cont.,

Page 8. 1.10 (g) *"There may be limited consumer choice of services such as referral centres for more advanced diagnostics and treatment, especially for highly specialised services. In some parts of the United Kingdom this may be because of limited availability of such facilities. In other cases, this may reflect ownership links or referral recommendations made by vet practices which deny consumers the full range of options that might otherwise be available.*

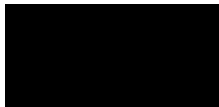
We agree with the focus in the Working Paper *Business Models, Provision of Veterinary Advice and Consumer Choice* on the risk of detrimental self-preferencing. We note that further evaluation is to be undertaken into this complex area of the veterinary services market.

Our academic referral hospital (the Queen Mother Hospital for Animals) is one of the largest and longest established referral hospitals in the UK receiving cases from both LVGs and independents. We also train the greatest number of veterinary specialists at a single site in Europe. We echo concerns around the general public's lack of understanding of the specialist qualification, despite the ongoing assurance of clinician capability due to the requirement for reaccreditation.

Conclusion:

As a leading provider of veterinary education, we recognise the importance of engaging to help shape the future of the veterinary marketplace and would welcome the opportunity to discuss these matters further with the CMA including, if appropriate, a visit to our referral hospital.

Yours faithfully,

A black rectangular box used to redact the signature of Stuart W.J. Reid.

Stuart W.J. Reid
President & Principal