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## Veterinary services for household pets in the UK

### VetPartners' response to the CMA's working paper on how people purchase veterinary services of 6 February 2025

(submitted 21 March 2025)

#### 1. Introduction

- 1.1. VetPartners welcomes the opportunity to submit comments on the CMA's working paper on how people purchase veterinary services dated 6 February 2025 (the "**Demand WP**"). Our comments below are not exhaustive. The fact that VetPartners does not expressly respond to a point in the working paper does not necessarily imply that VetPartners agrees with it.
- 1.2. VetPartners is separately providing responses to each of the CMA working papers of 6 February 2025. Due to the large degree of overlap between the various working papers, however, some of the points relevant to this Demand WP are dealt with in more detail in responses to other working papers and will not be repeated in this response. In particular, the features of quality, and how these are assessed by pet owners are set out in further detail in VetPartners' submissions to the CMA's working paper on business models, provision of veterinary advice and consumer choice dated 6 February 2025 (the "**Business Models WP**"). Where appropriate, VetPartners has included cross-references to the relevant responses.

#### 2. The CMA's emerging thinking fails to show any clear consumer harm

- 2.1. The Demand WP examines how pet owners choose veterinary services and whether pet owners are engaging effectively when making these choices.<sup>1</sup> It concludes that "*pet owners are unlikely to exert pressure on businesses through their choices to keep prices low*".<sup>2</sup>
- 2.2. VetPartners believes that the CMA has presented an unduly narrow view of the demand-side pressures in the market, and one which fails to capture the realities of the sector.
- 2.3. The evidence from the Vet Users Survey of January 2025 that was carried out for the CMA by Accent (the "**Consumer Survey**") suggests that consumers *are* satisfied with the quality and range of veterinary services on offer.<sup>3</sup> In addition, the fact that pet owners are not switching or 'shopping around' regularly does not mean that pet owners are not engaging effectively when making such choices. The choice of a veterinary service provider involves a careful assessment not just of price, but also of a range of other interrelated factors such as experience, reputation and ongoing relationships. In fact, the

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<sup>1</sup> Demand WP, summary, para 1.

<sup>2</sup> Demand WP, summary, para 7.

<sup>3</sup> Consumer Survey, Q55b.

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evidence suggests that pet owners engage with all these factors when making decisions about veterinary services.<sup>4</sup>

### **3. Comments on the CMA's Consumer Survey**

- 3.1. VetPartners provided the CMA with extensive comments in response to the CMA consultation on the proposed consumer survey.<sup>5</sup> VetPartners did not receive any reaction from the CMA on the submissions made. Based on a review of the published version of the Consumer Survey, the CMA has failed to take into account the majority of the methodological and other issues raised by VetPartners. For example, the CMA did not accept VetPartners' request to include a question in the survey for respondents to indicate whether they are aware of the CMA market investigation, even though this is a potentially material factor influencing consumer responses.
- 3.2. VetPartners also drew the CMA's attention to the fact that the survey was too long, and that without a proportionate incentive, consumer participation would be limited. Indeed, the participation rate of the Consumer Survey turned out to be very low (i.e. only 2,376 surveys were completed after having invited 65,819 pet owners to participate). This raises questions about the representativeness of some of the survey responses.
- 3.3. VetPartners also notes that in the Demand WP, and at the main party hearing held on 28 February 2025 (the "**Main Party Hearing**"), the CMA and Inquiry Group members appeared to express reservations regarding the reliability of some of the Consumer Survey responses, particularly those where pet owners expressed satisfaction with the services and options provided by vets.<sup>6</sup> VetPartners submits that it is not appropriate for the CMA to seek to selectively undermine its own survey, particularly when it was open to the CMA to address concerns raised in relation to the formulation of the questions.
- 3.4. Subject to the comments outlined above, VetPartners will refer to the results of the Consumer Survey where appropriate.

### **4. High client satisfaction and choice**

- 4.1. In this section, VetPartners addresses in more detail the suggestion made in the Demand WP that "*contextual factors*" (e.g. the trust which pet owners place in vets, the 'humanisation' of pets and the 'emotional' context of some vet services) may "*limit pet owners' ability to consider material information, evaluate the advice of their vet, make effective choices and shop around*".<sup>7</sup>
- 4.2. Whilst these "*contextual factors*" are an important reminder that the market for veterinary services is not directly comparable to other markets such as groceries or airlines, it is incorrect that such factors limit pet owners' ability to make effective choices. As

<sup>4</sup> Consumer Survey, Q15, Q19 (for prices); Q53, Q67, Q69, Q81 (for trust and reputation).

<sup>5</sup> VetPartners' comments on the draft CMA consumer survey questionnaire of 23 September 2024.

<sup>6</sup> Demand WP para 5.45. At the Main Party Hearing, Martin Coleman suggested that it is possible that the high recorded satisfaction levels reflect that pet owners may be unable to accurately measure or assess quality.

<sup>7</sup> Demand WP, para 4.24.

explained below, high levels of client satisfaction, coupled with the fact that clients feel *able* to switch and are happy with the number of options presented, suggest that, far from there being a weak customer response in the market, pet owners can and do make well-informed and effective decisions about veterinary care for their pets.

***A) Client satisfaction***

- 4.3. VetPartners is pleased to note the high levels of customer satisfaction recorded in the Consumer Survey, i.e. well over 80% in almost all areas.<sup>8</sup> VetPartners believes that this satisfaction level is very high, and indeed likely higher than in most other sectors. This is particularly true considering the timing of the Consumer Survey, when negative publicity off the back of the CMA market investigation, as well as the wider economic environment, was inevitable.
- 4.4. The high levels of customer satisfaction and trust reflect the highly professional way in which vets and nurses (at both LVGs and independents) have continued caring for pets in the face of significant industry challenges, such as Brexit and Covid-19. It is telling that the vast majority of those that choose not to research the available treatment options, do not think this is necessary on grounds that they trust their vet.<sup>9</sup> This also reflects the significant time and resources invested by VetPartners and its people to improve the quality of services provided to clients. See *Sections 3(A) and 7* of VetPartners' response to the Business Models WP, where VetPartners provides further details regarding the investments made by VetPartners and the high-quality services provided by VetPartners practices.

***B) Switching***

- 4.5. The Consumer Survey found that pet owners can easily switch to a large number of alternative providers, including mobile and online vets. This is evident in the fact that 85% of pet owners surveyed felt that they could switch practices,<sup>10</sup> and 64% of the 42% of pet owners that did change practices did so for reasons other than moving home.<sup>11</sup> In addition, 76% of pet owners either felt they could compare vet practices or did compare vet practices when choosing their current vet practice.<sup>12</sup>
- 4.6. The fact that pet owners are able to switch is one of the drivers behind VetPartners' focus on providing high quality client care as well as monitoring performance, for example through ~~Σ~~.<sup>13</sup> See also VetPartners' response to the Business Models WP, *Section 7(B)*.
- 4.7. Low *actual* switching rates are an indicator that competition is working well for the majority of pet owners as they are happy with the service they receive. It is telling that

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<sup>8</sup> Consumer Survey, Q55b.

<sup>9</sup> Consumer Survey, Q53, Q67.

<sup>10</sup> Demand WP, para 5.65.

<sup>11</sup> Consumer Survey, Q12a, Q33.

<sup>12</sup> Consumer Survey, Q12b, Q12c.

<sup>13</sup> VetPartners' response to the CMA's MR-RFI 2 of 23 February 2023 (submitted on 10 November 2023), Question 34.

the CMA did not find any material barriers to switching and found that the vast majority of FOPs face competition from a large number of providers in their local areas.<sup>14</sup>

- 4.8. Indeed, low switching (coupled with the fact that customers say that they can switch if they want to) is evidence that, consistent with the satisfaction levels referred to above, the vet sector generally provides good levels of service. In addition, the fact that switching rates are low is consistent with the high levels of client trust and satisfaction found by the CMA in the Consumer Survey.
- 4.9. In no way can switching levels in the veterinary sector be reasonably compared to banks or utilities.<sup>15</sup> The relatively low switching rates in the veterinary sector are likely more consistent with those for human healthcare, which similarly involve trust-based long-term relationships. Continuity of care in the veterinary sector should not be seen as a barrier to switching. Rather, it is reflective of the deep understanding veterinary professionals have of the needs of pets and pet owners, which in turn enhances clinical care and fosters an environment where multiple treatment options can be discussed.
- 4.10. In any case, the switching rate estimated by the CMA is likely to be an underestimate. 17% of pet owners that were with a vet practice for less than a year were also pet owners for less than a year,<sup>16</sup> and many (c. 23%) only had one visit to a veterinary practice.<sup>17</sup> Therefore, many would have had very limited interaction with vet practices in that time period. Further, the CMA should be mindful of the fact that some pet owners use two or three vet practices which they visit regularly, and that respondents to the survey may not have considered this to be ‘switching’ or ‘moving’ when answering the Consumer Survey questions.

### ***C) Price and quality***

- 4.11. As explained further in the response to the Business Models WP, quality is a multi-faceted concept. Practices compete strongly on each of the elements that together make up quality.
- 4.12. The vast majority of pet owners are satisfied with all aspects of service, including quality of service (85%), outcomes (82%), the level of care provided (88%) and the advice and information received (80%).<sup>18</sup>
- 4.13. The majority of pet owners who switched vet practices for reasons other than moving home cited quality considerations (including continuity of service) as a reason.<sup>19</sup>
- 4.14. There is a separate question as to whether pet owners are always able to fully assess all aspects of the quality of a practice and the people working there. As explained in detail in response to the Business Models WP, VetPartners believes that ‘quality’ is a multi-faceted concept, consisting of three main elements: (i) the practice facilities and equipment, (ii)

<sup>14</sup> CMA’s working paper on analysis of local competition of 6 February 2025, para 2.51.

<sup>15</sup> Demand WP, para 5.69.

<sup>16</sup> Consumer Survey, Q4.

<sup>17</sup> Consumer Survey, Q8a, Q8b.

<sup>18</sup> Demand WP, fn 416.

<sup>19</sup> Demand WP, para 5.60.

the services provided by the practice teams (including the customer experience) and (iii) the clinical care.

- 4.15. Whereas pet owners are able to judge the first two elements in most cases, in particular in relation to element (iii) (i.e. the clinical care), it may sometimes be challenging for pet owners to recognise and distinguish quality. However, even if this is the case, it is a given that vets and nurses are able to recognise quality in a clinical setting. As explained in response to the Business Models WP, they want to work in practices where they can provide appropriate and high-quality care. Therefore, in order to attract and retain vets and nurses, VetPartners needs to ensure that the clinical standards are kept at high levels.
- 4.16. Practices all compete on price to some degree, and price clearly matters to pet owners. (41% of pet owners found out information about prices *before* registering with their current vet practice).<sup>20</sup> However, a scenario where competition only takes place on price (i.e. pet owners shopping around to find the lowest prices on individual treatments without regard to quality) would have serious unintended consequences. For example, there would be limited continuity of care and relationship between vets and pet owners, making it more difficult for vets to notice if an animal is behaving differently or if something is wrong. It would also undermine the principle of contextualised care, in that vets would be more concerned about presenting the cheapest option for the pet, rather than considering holistically what options are best presented from the perspective of both the pet and pet owner.
- 4.17. VetPartners' view on 'quality' is discussed in further detail in response to the Business Models WP.

***(D) Pet owners are happy with the information and options available to them***

- 4.18. VetPartners wants pet owners to have all the necessary information to make informed decisions. The Consumer Survey found that:
- a) More than 80% of the pet owners agreed that (i) vets take the time to explain options and (ii) they were able to make informed decisions based on the information provided by vets. This is also confirmed in the CMA's overall conclusion that the evidence suggests that pet owners may be offered a choice of treatments.<sup>21</sup>
  - b) Only 20% of pet owners surveyed did not believe that their vet takes their personal circumstances into consideration (i.e., contextualised care).<sup>22</sup> Of course, this impression could sometimes arise in circumstances where there are no suitable alternative treatment choices available.
- 4.19. LVG-owned practices were better at providing pricing information (and price lists) than independent practices.<sup>23</sup> This is consistent with the time and effort that VetPartners puts into designing and implementing policies and training around pricing. The majority of

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<sup>20</sup> Consumer Survey, Q13, Q15.

<sup>21</sup> Demand WP, para 5.191.

<sup>22</sup> Demand WP, para 5.150(d).

<sup>23</sup> Consumer Survey, Q50, Q52c.

pet owners felt that they were able to decline a service once the price was communicated (62%),<sup>24</sup> with a further 12% saying no for reasons beyond the control of the vet practices.

4.20. VetPartners believes that, if a survey similar to the Consumer Survey had been conducted ten years ago, the overall results would have been weaker in areas such as transparency, providing estimates and offering choice (and in any event, it is clear from the Competition Commission investigation that this was not the case for medicines in 2003).<sup>25</sup> The LVGs have played a key role in the quality improvements in these areas, for example, through the provision of extensive training. In this regard, please see the various training materials that VetPartners has shared previously with the CMA.<sup>26</sup> See also VetPartners' response to the Business Models WP, *Section 3(A)*.

4.21. The CMA also appears to recognise that:

- a) There is no deliberate strategy on the part of vet practices to hide information from pet owners, and there is no evidence of improper incentives relating to KPIs that create conflicts and affect the clinical decision making of vets.<sup>27</sup> See also VetPartners' response to the Business Models WP, *Section 6(C)*.
- b) There are features inherent in the supply of veterinary services that make it challenging to provide further or more detailed information in a uniform, consistent and comparable manner, including: (i) differences in pricing due to the details of the services provided, the breed and characteristics of the pet, and a range of other factors, as well as the sheer number of different fee items (and therefore it would be practically impossible to provide the required level of detail next to each fee item needed for a like for like comparison); (ii) not all pet owners want the full list of options presented to them, especially when they are in a vulnerable and emotional state (for example at the time of a pet being euthanised); and (iii) vets are generally doing a good job at exercising their professional judgment, which is also consistent with the CMA's finding that the vast majority of pet owners are happy with the information available to them.

## **5. Pet health plans**

5.1. This section addresses the suggestion in the Demand WP that pet health plans "*may not offer value for money for some pet owners that would otherwise not use many of the routine services included in plans*", and that "*vet businesses may be motivated to increase pet care plan uptake*."<sup>28</sup>

5.2. The CMA misinterprets the purpose of pet health plans and their value to pet owners, as well as the motives of the veterinary professions offering them. As explained below, pet health plans ensure that pets are receiving the appropriate treatment whilst offering cost savings to pet owners. The fact that some pet owners would not otherwise use the services

<sup>24</sup> Consumer Survey, Q52.

<sup>25</sup> Competition Commission, report on the supply of prescription-only veterinary medicines (11 April 2003).

<sup>26</sup> See, for example, VetPartners' response to the CMA's s 174 notice (RFI 1) of 23 May 2024 (submitted 18 June 2024), Questions 25-26.

<sup>27</sup> Business Models WP, para 2.117.

<sup>28</sup> Demand WP, para 5.71 ('Our emerging view on how pet owners choose pet care plans').



under the plan is not indicative of a lack of value for money, but rather, it's indicative of the fact that pets without a pet health plan are generally exposed to greater health risk.

***A) What is included in pet health plans***

- 5.3. The pet health plan prices are variable, as are the inclusions. ✕.
- 5.4. ✕.
- 5.5. Where treatments are included in the pet health plans, they are based on the clinically recommended frequencies. Vaccines for pets are aimed at protecting the individual pets, as 'herd immunity' is rarely achieved for pets (which is the main aim of vaccines in human healthcare). Therefore, pets require more regular vaccines. Importantly, some of the vaccines and parasiticides that are included in pet health plans have wider public health benefits to protect humans from some of the diseases, such as 'Toxocariasis', that is spread through pets. This can cause serious illness, and in some cases, blindness in humans. A 2023 WormWatch study found that 86.6% of parks in the UK and Ireland have *Toxicara* eggs.<sup>29</sup>
- 5.6. During the Main Party Hearing, the CMA asked whether, absent a pet health plan, pet owners would on average have vaccinated their pets less frequently (and therefore save money, compared to the pet health plan). This is not a useful or fair comparison. Vets can only make recommendations to pet owners based on their code of conduct and clinical judgment. Where vaccines are concerned, for example, vets are further guided by the recommendations from vaccine manufacturers and studies around public or animal health that specify the efficacy and duration of immunity for different vaccines. It would be irresponsible to sell pet owners a pet health plan that does not follow clinical best practice. This would expose vet practices to risk and liability and would actively harm animal welfare, public health, and client satisfaction.

***B) The value of pet health plans to pet owners and practices***

- 5.7. VetPartners' pet health plans offer significant benefits to both pet owners and pets. The plans offer consistency and predictability of payments for pet owners. In addition, as explained above, they are designed to ensure that pets receive all the essential basic treatments and vaccinations at the appropriate frequency.
- 5.8. VetPartners believes that it is important to be transparent about the benefits of pet health plans for pet owners and the relevant pets. For example, VetPartners has a template pet health plan client savings poster, which can be tailored for individual practices.<sup>30</sup> The current version of this details the daily cost to the client, the range of treatments included under the plan, the discounts and benefits offered, and an estimate of the total savings.

<sup>29</sup> See <https://www.veterinary-practice.com/2023/wormwatch-study-published-in-vet-record-reveals-widespread-toxocara-contamination-across-the-uk-and-ireland#:~:text=Results%20of%20a%20new%20WormWatch,walks%20and%20other%20recreational%20activities> (accessed 13.02.2025).

<sup>30</sup> VetPartners' response to the CMA's MR RFI 1 of September 2023 (submitted 11 October 2023), Question 22, Annex 024.

Pet owners also receive reminders before their pet's health check (every six months) and reminders about the available products under the plan.

- 5.9. VetPartners has a ✕.<sup>31</sup> VetPartners' pet health plans are marketed through practice websites. In addition, practice teams generally raise the topic with new clients proactively.
- 5.10. At the Main Party Hearing, an Inquiry Group member appeared surprised at the fact that the potential savings for customers are calculated using the practice's individual prices as a benchmark rather than competitors' prices. VetPartners, however, has identified no industry where volume or subscription-based savings are marketed to consumers using a third party's individual prices as a benchmark. For example, when a consumer purchases a mobile phone tariff which advertises a £120 saving for a 12-month contract, this is calculated on the basis that the tariff is £10 per month cheaper than it would be to purchase 12 months individually.

### ***C) No consumer harm from pet health plans***

- 5.11. VetPartners has previously reviewed the average spend of clients on pet health plans as compared against those not on the plans. The main difference is that ✕.

## **6. Increased transparency should not come at the expense of competition and clinical discretion**

- 6.1. In this section, VetPartners addresses the CMA's observation that pet owners have limited awareness of practice ownership for four of the six LVGs, including VetPartners.<sup>32</sup> VetPartners values individual practice branding and discretion. There is no evidence that this individual practice discretion is in any way adversely impacting competition.

### ***A) Individual practice discretion***

- 6.2. VetPartners is deliberately structured as a collection of individual practices. Practices build their unique brands and reputation over many years, and individual practice teams are given autonomy to make clinical, operational and commercial decisions. VetPartners' role is to provide a framework for its practices, which seeks to combine the freedom enjoyed by independent practices with an emphasis on enhanced quality standards (including Practice Standards Scheme ("PSS") accreditation, field based BDDs, a clinical board and regulatory team). As part of the framework created by VetPartners, it provides the internal services to practices that vets and nurses do not generally enjoy (and indeed are often not as good at), such as invoicing, logistics, supply arrangements, cyber-security etc. See also VetPartners' response to the Business Models WP, *Section 4*.
- 6.3. The CMA should be mindful not to undermine this model, whether by interfering unnecessarily in the clinical and operational autonomy of individual vets and registered veterinary nurses (e.g. by requiring LVGs to exercise greater influence and oversight over

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<sup>31</sup> VetPartners' response to the CMA's MR RFI 1 of September 2023 (submitted 11 October 2023), Question 22, Annex 025.

<sup>32</sup> Demand WP, para 5.47.



practices), or by diminishing consumer choice and competition between practices by imposing standardised or uniform branding obligations.

### ***B) Branding***

- 6.4. Only 14% of pet owners say that an “*independent vet practice not [being] part of a large group*” is a relevant consideration for choosing a practice (and for only 4% is it the main reason),<sup>33</sup> a figure which in itself is most likely overstated due to the negative publicity surrounding LVGs off the back of the CMA market investigation. Further, ~~X~~.<sup>34</sup> In addition, this is supported by qualitative research published by the CMA in 2024, which found that most pet owners were not concerned about group ownership and considered the vet more important than the practice owner.<sup>35</sup>
- 6.5. In any event, given the limited local concentration, there is no risk of any material number of pet owners being ‘misled’ by thinking they are comparing prices between two different groups.

## **7. Choice of cremation provider and services**

- 7.1. The Demand WP claims there is evidence to suggest that “*pet owners do not shop around for cremation services*” and that there “*may not be a sufficiently strong customer response to generate effective competition when FOPs sell cremation services*”.<sup>36</sup> In this section, VetPartners demonstrates that ‘shopping around’ is a wholly inappropriate term in the context of end-of-life care for pets, which, as the CMA recognises, is a particularly emotional and distressing time for pet owners.
- 7.2. As explained in more detail below, the evidence suggests that pet owners are provided with sufficient options with different price points, but that these are presented in a way that is mindful of the pet owner’s sensitivity and vulnerability at a particularly difficult time.

### ***A) Providing end-of-life care for pets***

- 7.3. VetPartners is disappointed by the narrow and transactional picture which the CMA has painted of end-of-life care for pets.
- 7.4. VetPartners is proud of the level of compassion and thoughtfulness which its vets show to pet owners when their pet has died. The number of thank you cards and gifts received by vets is testament to this. From ensuring the client has company at home and advising on pet bereavement services, to arranging keepsakes such as a lock of hair or paw prints, the service provided tends to be so much more than the isolated ‘product’ sale which the CMA has seemingly made it out to be.

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<sup>33</sup> Demand WP, para 5.21.

<sup>34</sup> VetPartners’ response to the CMA’s MR RFI 1 of September 2023 (submitted 11 October 2023), Question 22, Annex 029 (in particular, p15 and p28).

<sup>35</sup> Report prepared for the CMA by Kubi Kalloo “Qualitative Research on Pet Owners’ Experiences of Buying Veterinary Services in the UK” (February 2024), p.24.

<sup>36</sup> Demand WP, para 5.239 (‘Our emerging view on how pet owners choose cremation providers’)

***B) How VetPartners offers individual and communal cremations as a service***

- 7.5. The CMA suggests that providing euthanasia and cremation as a single service may make it difficult for pet owners to compare prices.<sup>37</sup> This is incorrect and misleading.
- 7.6. End-of-life care is a service, not a product. The RCVS PSS Module 3 Client Experience in the Core Standards for cremations requires an assessment to establish whether the practice has a “*written protocol outlining how options are discussed and/or information is provided to clients on cremation, destination of ashes etc.*”<sup>38</sup>
- 7.7. VetPartners’ retail prices for cremation services, therefore, include ✕.<sup>39</sup>
- 7.8. Most VetPartners practices provide ✕. Further, charging an overall fee for the full service of euthanasia and cremation provides the pet owner with a clear upfront price, which reduces the stress of making multiple decisions during a difficult time.
- 7.9. The type of service and time spent by the vet and team may impact the price of the service. This differs depending on whether the client opts for an individual or communal cremation.
  - a) For individual cremations, the costs are higher. ✕.
  - b) For a communal cremation, the cremation itself is cheaper, ✕.
- 7.10. All VetPartners practices offer clients a choice between individual and communal cremations and VetPartners ensures that its vets explain to clients the price differences between these services. This is also required under the PSS.

***C) The existence of alternative options of cremations provider***

- 7.11. VetPartners welcomes the CMA’s recognition of the important and positive benefits to pet owners of purchasing the cremation services provided by their FOP’s contracting partner.<sup>40</sup>
- 7.12. VetPartners is concerned, however, about the CMA’s conclusion that “*evidence indicates that pet owners are often not made aware by their FOP that they have alternative options [of cremation service providers]*”.<sup>41</sup> Firstly, this implies that pet owners are not already aware that more than one cremation service provider exists. Further, the CMA’s conclusion implies that vets deliberately keep pet owners in the dark about the existence of alternative cremation service providers. Both of these statements are misleading and manifestly untrue.
- 7.13. In the Consumer Survey, where the CMA considered the reasons why pet owners did not compare cremation providers, only 2% responded that this was because they were

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<sup>37</sup> Demand WP, para 5.273

<sup>38</sup> See RCVS Practice Standard Scheme Modules and Awards Small Animal Version 3.3 (September 2024), item 3.1.6.

<sup>39</sup> Also see VetPartners’ response to the CMA’s Issues Statement of 9 July 2024, para 6.4.

<sup>40</sup> Demand WP, para 5.239 (‘Our emerging view on how pet owners choose cremation providers’).

<sup>41</sup> Demand WP, para 5.239 (‘Our emerging view on how pet owners choose cremation providers’).

“unaware of other options”.<sup>42</sup> This suggests that almost all pet owners are aware of the existence of other providers, and in this regard, it is telling that of those who *did* compare different providers of cremation services, 94% (29 out of 31) were able to find the information they wanted regarding prices and services offered.<sup>43</sup>

- 7.14. Therefore, the CMA’s emerging thinking is not supported by its own evidence.
- 7.15. Further, there are many reasons why being shown a range of cremation service providers may not be in the interests of pet owners. For example, pet owners value advice that comes from a trusted and reliable source, a fact consistent with the CMA’s own findings that 49% of pet owners did not compare cremation providers because they *preferred* to follow their vet’s recommendation.<sup>44</sup>
- 7.16. As VetPartners has emphasised previously,<sup>45</sup> the loss of a pet is an emotionally charged situation: it would be impractical and insensitive for a vet to run through a detailed list of providers and pricing options in the consultation room when a pet has just been euthanised or is about to be euthanised. This is reflected by the fact that 38% of the respondents in the Consumer Survey did not compare different cremation providers because they did not want, or have the chance to, and 5% felt that they were “*too upset*” to compare different cremation providers.<sup>46</sup>
- 7.17. Nevertheless, as stated above, the PSS already requires practices that are part of the scheme to have a written protocol outlining how options are discussed, and information is provided. ✕.<sup>47</sup>
- 7.18. Finally, it is disappointing that the CMA has included allegations from some independent crematoria that LVG FOPs often forbid the collection of pets by a third party, despite the CMA itself acknowledging that it has found no supporting evidence for this.<sup>48</sup> For the avoidance of doubt, none of VetPartners’ practices prevent the collection of pets by a third party, nor do they forbid the storage of remains for collection.
- 7.19. However, as VetPartners emphasised at the Main Party Hearing, the CMA should be mindful of veterinary practices’ regulatory obligations as producers of waste, and the responsibilities they continue to have for the safe and compliant disposal of animal remains, even after these have been passed to a third party. For example, veterinary practices must ensure that third-party waste disposal services are properly licensed and comply with legislation such as the Controlled Waste Regulations 2012. The UK Government has also introduced different categories of animal by-product, which come with different regulatory requirements.<sup>49</sup> In short, it is not as easy as just ‘handing the body over’.

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<sup>42</sup> Consumer Survey, Q106c.

<sup>43</sup> Consumer Survey, Q105.

<sup>44</sup> Demand WP, para 5.262.

<sup>45</sup> VetPartners’ Response to Issues Statement (30 July 2024) para 6.9.

<sup>46</sup> Consumer Survey, Q106c.

<sup>47</sup> See, for example, the Beechwood Veterinary Group consent form for euthanasia (**Annex MI-03546**).

<sup>48</sup> Demand WP, para 5.277.

<sup>49</sup> See <https://www.gov.uk/guidance/animal-by-product-categories-site-approval-hygiene-and-disposal> (accessed 17.03.2025).

***D) VetPartners' relationship with Pet Cremation Services (PCS)***

- 7.20. At the Main Party Hearing, the CMA raised questions about VetPartners' wholly-owned cremation business (PCS), and the interaction between PCS, VetPartners practices and other non-VetPartners-owned practices.
- 7.21. As VetPartners has explained previously,<sup>50</sup> VetPartners does not require its practices to use PCS. VetPartners also does not require its practices to report to it any use of an alternative provider. ✕.
- 7.22. In addition, PCS is operated as an independent business, and it provides its services to practices which are not owned by VetPartners. VetPartners provided the CMA with a detailed overview of PCS's pricing, which showed that ✕.<sup>51</sup>

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<sup>50</sup> VetPartners' response to the CMA's request for information (MR, RFI 1) of 13 September 2023 (submitted 11 October 2023), Questions 44-45.

<sup>51</sup> VetPartners' response to the CMA's s 174 notice (RFI 1) of 23 May 2024 (submitted 18 June 2024), Question 55.