



Competition and Markets Authority
Investigation into veterinary services for household pets

27th February 2025

Dear Sir/Madam,

Re: Competition and Markets Authority Working Papers, February 2025

Zoetis appreciates the CMA's ongoing work on the market investigation and welcomes the opportunity to provide feedback on the working paper published on 6 February 2025, titled "*Competition in the Supply of Veterinary Medicines*."

The CMA has raised concerns that FOPs, as commercial veterinary businesses, may have a financial incentive to prescribe injectables, creating a barrier for pet owners who wish to purchase veterinary medicines from third-party retailers. Additionally, pet owners may feel less confident to request a written prescription for an injectable product compared to those available in tablet or liquid suspension forms¹.

We believe this concern warrants further discussion, expanding beyond commercial aspects to consider the clinical benefits and animal welfare advantages of injectable therapies. Injectable therapies are not necessarily a direct substitute for tablet and liquid formulations and should be evaluated on their own merits. They can have a different efficacy and safety profile and provide a different solution that helps address challenges around compliance. Compliance issues are well documented, and evidence exists to show that poor compliance can negatively impact patient health, prolong treatment duration, and increase costs for pet owners. Furthermore, injectables carry different safety profiles in relation to risk to human health if self-injected. Pet owners may prefer the benefits of compliance over the repeated administration of oral medication at home, as it can reduce the burden of care and help preserve the pet-owner bond. This aspect needs to be taken into consideration.

The CMA has also suggested that injectables may be more commonly administered within FOPs, potentially driving increased practice visits or limiting third-party competition.² However, managing many chronic conditions—such as osteoarthritis (OA)—require more than medication alone. Effective OA management involves weight control, exercise, physiotherapy, and appropriate pain relief, all of which require ongoing engagement with veterinary professionals. The management of a chronic condition therefore requires greater levels of engagement to support the pet and indeed the pet owner resulting in regular visits to the practice whether injectables are administered or not. Removing some of the daily tasks involved has been shown to improve compliance which benefits the patient as well as reduces the burden of care on the pet owner. Treatment discussions should always involve a full range of therapeutic options allowing pet owners to make an informed choice about what best suits

¹ CMA Working paper "Competition in the supply of veterinary medicines", 6th February 2025, para 5.85

² CMA Working paper "Competition in the supply of veterinary medicines", 6th February 2025, para 5.90

their pet's health and their personal circumstances. Injectable therapeutics should therefore play an equal part in the discussion and not omitted solely due to their route of administration.

It has also been noted that “*manufacturers are ‘moving to more injection-based medication to mitigate online pharmacy threat’*”.³

Similar to the evolution of therapeutics in human medicine, Monoclonal antibodies (MABs) have become a focus within animal health. This shift is not intended to counter the threat of online pharmacies but rather represents a global effort to enhance animal health and welfare through more targeted therapeutics. The introduction of these therapies is based on scientific innovation and clinical need rather than market positioning: these types of therapeutics have a more targeted effect as well as fewer side effects as documented in their SPCs. The nature of MABs is that they have a prolonged effect which also supports the challenge of compliance but are limited in that they can only exist in an injectable formulation and cannot be administered orally.

The CMA has also expressed concern that the use of injectables may act on pet owners’ nervousness about giving medicines to their pet, such that they may prefer to buy medicines from their FOP rather than from third-party retailers.

It is important to highlight that clinically appropriate options, including injectables where beneficial, enhances treatment adherence and improves both pet welfare and owner experience. Ensuring pet owners are well-informed and empowered to choose the most suitable treatment is paramount. This includes discussions on all available therapeutic options, rather than discouraging certain formulations based solely on their mode of administration.

We are available to provide additional evidence, technical data, or industry insights as needed to support this discussion. Zoetis welcomes continued engagement with the CMA and industry stakeholders to ensure that the evolving veterinary medicines market remains competitive while upholding the highest standards of patient care, ethical prescribing, and consumer choice.

Yours faithfully,

Zoetis UK

³ CMA Working paper “Competition in the supply of veterinary medicines”, 6th February 2025, para 5.90