

VETERINARY SERVICES FOR HOUSEHOLD PETS MARKET INVESTIGATION

Summary of hearing with the British Veterinary Association, British Small Animal Veterinary Association, British Veterinary Nursing Association and Federation of Independent Veterinary Practices held on 14 March 2025

Introduction

1. BVA/BSAVA/BVNA/FIVP (the veterinary organisations) are four different membership organisations.
2. The veterinary organisations noted some significant changes in the veterinary industry in recent years, including increased corporate ownership, developments in treatments available to pets and a recruitment and retention issue in the workforce.
3. The veterinary organisations cautioned that the wrong remedies could have impactful consequences on animal welfare and veterinary professionals.

Veterinary services

4. The veterinary organisations said they would welcome greater transparency of pricing and making practice ownership clear to the customer.
5. The veterinary organisations welcomed the CMA's focus on providing better information for referrals, OOH and cremations, though they noted the risk of overloading the customer with information.
6. The veterinary organisations highlighted the importance of a long-term vet-client-patient-relationship and trust between the vet and the customer which improved communication and mitigated risk of unexpected outcomes. The pet is not treated in isolation but together with the owner. . The veterinary organisations cautioned against any remedies which undermined the relationship between the client and their vet. The veterinary organisations said that switching to a new FOP was complicated and hindered the benefit of a long-term vet-client-patient-relationship, therefore they outlined the

importance of not replacing this with a more transactional relationship dynamic. Relevant and timely information should be provided to consumers where it is important to their decision making.

7. The veterinary organisations said that quality care consisted of good communication and patient care. The veterinary organisations said that making PSS mandatory would give consumers an indicator of quality. This was important in an industry where price did not necessarily reflect quality, making quality hard to determine. They suggested relevant information should be indicated on client-facing media or a comparison site, such as the RCVS's Find-a-Vet facility. Such a site could also include professional qualifications of staff and customer recommendations. Quality measures were more difficult to assess or standardise but, in theory, these could also be included. The veterinary organisations would like people to understand more about responsible pet ownership, which might be something for government to consider.
8. The veterinary organisations said they were of the view PSS did differentiate standards but more could be done to help consumers understand quality levels of different vet practices.

Veterinary medicines

9. The veterinary organisations welcomed the CMA's focus on greater transparency in medicines pricing and promoting awareness of written prescriptions.
10. The veterinary organisations did not think the length or the language of written prescriptions restricted access. In their view, linking written prescriptions to pharmacies would take considerable work as evidenced by the NHS's move to digital prescriptions.
11. The veterinary organisations submitted that requiring price lists for medicines could mean that vet businesses pursued loss leaders. It could be difficult to calculate what the top 10 medicines were for a practice, if that was what the price list applied to, as there could be different ways of measuring this.
12. The veterinary organisations submitted that prescription processes could be improved, for example to allow more prescribing by generic name. At the same time, they noted the challenges posed by increased use of written prescriptions, for example in antibiotics where breaks between initial and follow-up treatment could be clinically problematic.

13. The veterinary organisations thought independent FOPs could obtain reasonable rebates if they participated in a buying group but would have to opt-in to the buying group's preferred brands to gain the benefits or risk having no leverage power.

Recruitment and Retention

14. The veterinary organisations saw recruitment as predominantly based on local factors such as practice reputation, location and the type of work available at the practice. They said that the ultimate ownership of the practice was less relevant, though a minority of vets have a strong preference to work in an independent practice.
15. The veterinary organisations said that factors affecting retention included clinical autonomy, career progression, work-life balance and pay, although they also considered that pay was not a big motivating factor for professionals.
16. The veterinary organisations considered various factors to have influenced the decrease in risk-taking which was currently observed. In the past, there were fewer referral centres so vets needed to do the procedures themselves. Now that more options are available, the approach is more risk-averse. Clients also have a high expectation of what veterinary care can achieve which adds to vets' fear of repercussions if things were to go wrong.
17. The veterinary organisations said that younger vets had fewer role models to pass on their expertise than was the case for previous generations. Some newer vets also got less hands-on experience during the COVID-19 pandemic. They said that experienced professionals often sell their practice to a corporate when they retire, rather than handing over to a new generation.

Regulation

18. The veterinary organisations agreed that businesses should be regulated. They considered the Veterinary Surgeons Act 1966 (VSA) to be outdated and unclear. They would support implementation of practice regulation, standardisation in complaints processes and external scrutiny similar to that provided by the Professional Standards Authority for human health and social care regulators. The RCVS has already used its code of conduct to full capacity; reform of the VSA is needed to implement changes. Several of the veterinary organisations are working with Defra on development of potential changes that can be put out as a public consultation.

19. The veterinary organisations supported the protection of the title of Registered Veterinary Nurse (RVN), as currently there is little signposting and consumers do not know if practices are using unqualified staff. Professional guidelines may not always be instructive on what tasks vets can delegate to nurses. The veterinary organisations suggested that a list of tasks suitable for delegation should be published in the interim, pending new regulation.
20. The ambiguous language on professional misconduct gives RCVS limited scope to act. Reform of the VSA should allow a move from addressing concerns retrospectively to being able to act at the point where concerns arise.
21. The veterinary organisations agreed a clearer delineation of the regulatory and Royal College functions within the RCVS would be helpful, though they did not call for complete separation. An appointed regulatory RCVS Council should contain suitably experienced and qualified veterinary surgeons in addition to lay members.
22. The veterinary organisations supported making PSS a mandatory benchmark. Sector-wide support already exists for making PSS more accessible to help consumers and core standards include very little beyond baseline legal standards that all practices should be meeting.
23. The veterinary organisations said that they were in favour of a standardised complaints process and that they would like to see existing training mechanisms, such as the Veterinary Defence Society's platform, Vetsafe, utilised so that the profession could learn from their mistakes and near misses.