

Response to the Remedies Working Paper published by the CMA on 1st May 2025 in relation to its Market Investigation into veterinary services for household pets

1. The Veterinary Schools Council (VSC) represents the United Kingdom's veterinary schools. Our Council is an authoritative voice on matters relating to veterinary education – from the selection, teaching and training of those who will be the future of clinical practice, to the clinical academics and researchers who are critically important to the health of both the animal and human populations in the United Kingdom.
2. We welcome the working paper and the further detail it provides on the CMA's emerging concerns and the 28 possible remedies it is considering. We strongly welcome the CMA's clear recognition of the need for an updated regulatory framework, and we are pleased to be working alongside other key stakeholders to assist Defra with the development of recommendations for a public consultation on new veterinary legislation.
3. We note that remedies 1 to 14 concern the business practices of entities providing clinical services to consumers, which falls largely outside of VSC's scope as an organisation. As such, we do not intend to respond to the consultation questions that relate to these remedies. Some of our member institutions, particularly those that do provide clinical services directly to the public, may submit individual responses to these questions.
4. We note that remedies 15 to 25 concern potential recommendations for a new regulatory framework for veterinary businesses. While we do not intend to comment on specific elements of the framework, we welcome the opportunity to respond to questions that relate to the proposed spirit and scope of any new regulation.
5. In response to **Question 73**
 - We agree that statutory regulation should be applied to veterinary businesses in addition to individual veterinary professionals. In our view, it would be important for any such regulation to apply to any entity providing clinical veterinary services to the public in any context, not only to for-profit businesses serving household pets. We acknowledge that some of these entities fall outside the scope of the CMA's current investigation.
 - We agree that any such regulation should apply at organisational level to a corporation, partnership or individual, depending on the specific ownership structure of an individual entity.

- We agree that any such regulation would be best applied, monitored and enforced by a dedicated specialist regulator such as the RCVS.
- We strongly support the principles of transparency and fair competition in the market for veterinary services for household pets.

6. In response to **Question 78**

- We would question whether it is the role of the veterinary regulator to promote competition or mandate that consumer interests be treated as equally important as animal welfare and public health. While we appreciate that competition can often be complementary to animal welfare and public health considerations, it may also be contradictory.
- We would therefore have concerns about a statutory consumer and competition duty on the veterinary regulator. We instead propose that regulation of veterinary businesses focuses on the protection and reinforcement of clinical autonomy, allowing veterinary practitioners to exercise their professional judgement in all situations, unimpeded by any anti-competitive policies and procedures.

7. In response to **Questions 80 to 85**

- We agree that effective and proportionate compliance monitoring and enforcement is fundamental to credible regulation of veterinary businesses.
- We agree that this should include a system of registration, licensing, and compliance certification, as well as routine and spot inspections, powers of entry, information-gathering powers, and powers to impose a range of sanctions.

8. We restate our readiness to engage with the CMA and other government agencies and departments to ensure that veterinary schools are able to respond constructively to any relevant recommendations and assure both the quality and quantity of graduates required by the profession into the future.