

To whom it may concern

This is my individual response having read the extremely detailed report over the last few days and tried my best to interpret its findings.

My personal relationship with the report is [REDACTED] years in mixed general practice in a non-corporate setting across [REDACTED] different local practices. I am not an owner but would consider myself to have a decent understanding of what makes the economics of rural mixed animal practice function.

I am aware that the report is written about small animal but there will be inevitable consequences if all its findings are carried out onto the farm and equine side of things. Some of which could leave huge areas of lack of competition if the large animal market is considered. I can see huge implications in these fields if some of the proposed prescription changes come to pass.

There has been consideration of the fact that only 4% of areas have lack of competition. However if some of the proposals have the impact I feel they will on the large animal market then a much higher non-competitive area of the country will occur. Therefore I feel the proposals really risk competition in the veterinary market.

I don't quite know the stats but there has been a sudden and welcome influx of new start independent practices in the last 5 years, if the proposals from this report occur then this will seriously stymie the market and put off potential new entrants.

The most scary issue for me was that my friend in [REDACTED] was looking for a non ivc large animal practice and the nearest one was us which is 62 miles away and 1 hour 45 mins drive, he did have the option of 6 ivc practices nearer though. I worry about his ability to retain emergency cover long term.

Yours

[REDACTED]

[REDACTED]

[REDACTED]

In response to individual questions

Responding to our Remedies Working Paper.

7.1 7.2 7.3 7.4 7.5 The consultation questions set out throughout this working paper are repeated in

in this section for ease of reference. We welcome responses to these questions from any interested parties by 5:00pm on Tuesday 27 May 2025. Please email written submissions to VetsMI@cma.gov.uk.

We intend to publish all responses from businesses and other organisations on our case page except those marked as confidential. Please clearly highlight any confidential information in your submission and provide a non-confidential version of your submission for publication.

We may also decide to publish anonymised submissions from individuals on our case page. Please clearly mark your submission as confidential if you do not want it to be published and let us know if you would prefer not to be named.

We will redact, summarise, or aggregate information in published reports where this is appropriate to ensure transparency whilst protecting legitimate consumer or business interest. While the information you provide will primarily be used for the purposes of this investigation, where appropriate, we may also use information provided as part of this consultation in relation to the CMA's other functions. For example, we may share your information with another enforcement agency (such as local Trading Standards Services) or with another regulator for them to consider whether action is necessary.

Personal data received in the course of this consultation will

Consultation questions

Implementation of remedies

● **Question 1: We welcome comments regarding our current thinking on the routes to implementing the potential remedies set out in this working paper.**

Trialling of information remedies

I find it really dangerous that a small animal led cma report is potentially going to affect the future of the farm animal vet sector. - I would like to see analysis done on the equine and farm side of the vet industry before the small animal proposals change legislation across the board as o feel there will be negative effects

● **Question 2: We invite comments on whether these (or others) are appropriate information remedies whose implementation should be the subject of trials. We also invite comments on the criteria we might employ to assess the effects of trialled measures. Please explain your views.**

I would like to see analysis of competition in the next few years post the report. A larger survey of competition locally at 5 yearly intervals would seem wise, together with a record of vet start up businesses as I feel the report as a whole prevents vet start ups by introducing a huge volume of bureaucracy.

Remedy 1: Require FOPs and referral providers to publish information for pet

Owners

● **Question 3: Does the standardised price list cover the main services that a pet owner is likely to need? Are there other routine or referral services or treatments which should be covered on the list? Please explain your views.**

Painkilling course is a difficult one

I would add pyometra operation, Caesarean section op as they are nice fixed price things and currently most places will have individual prices for them

● Question 4: Do you think that the ‘information to be provided’ for each service set out in Appendix A: Proposal for information to be provided in standardised price list is feasible to provide? Are there other types of information that would be helpful to include? Please explain your views.

The 20kg Euth is an odd concept. Surely an aggressive dog is an issue and we are then forced to stick to a “list price”

Should it be worded “moribund 20kg dog”

This is a lot of work and places more work onto smaller practices unfairly, as I feel a lot of the proposals do, which I believe is perhaps the opposite of the reason the cma investigation was launched- definitively a unrealised consequence

● Question 5: Do you agree with the factors by which we propose FOPs and referral providers should be required to publish separate prices for? Which categories of animal characteristics would be most appropriate to aid comparability and reflect variation in costs? Please explain your views.

Base everything on a lab retriever and a toy dog and give 2 prices(which can obviously be the same if the practice chooses)

No dogs actually weigh 20 kg

● Question 6: How should price ranges or ‘starting from’ prices be calculated to balance covering the full range of prices that could be charged with what many or most pet owners might reasonably pay? Please explain your views.

What you would currently write in a quote eg 250-750

● **Question 7: Do you think that the standardised price list described in Appendix A: Proposal for information to be provided in standardised price list would be valuable to pet owners? Please explain your views.**

Yes but will lead to confusion and conflict when animals behave as the biological beings they are and develop issues, we then have a fixed price list which people will expect us to stick to

● **Question 8: Do you think that it is proportionate for FOPs and referral providers to provide prices for each service in the standardised price list? Please explain your views.**

Fop should only provide prices for services they are happy to undertake- they should state options of referral centres for ones they are not- this will make single referral places obvious also and clients can follow the names to the prices at the appropriate referral institute, it is too much work for fops to be constantly updated on other suppliers prices

● **Question 9: Could the standardised price list have any detrimental consequences for pet owners and if so, what are they? Please explain your views.**

Race to the bottom on the “standard prices”

With potential for inflation of non standard prices.

The standard prices will become loss leaders in effects potentially

● **Question 10: Could the standardised price list have any detrimental consequences for FOPs and referral providers? Are you aware of many practices which do not have a website? Would any impacts vary across different types or sizes of FOP or referral provider? Please explain your views.**

When starting up any vet practice needs to create a website, now they would need to add a huge pricelist to this and stick to it no matter the fluctuations of the business. I see this as being really damaging to entrepreneurs which is the historic basis of competition in the vet profession

● Question 11: What quality measures could be published in order to support pet owners to make choices? Please explain your views.

Practice standard ratings would be my thought on this

Remedy 2: Create a comparison website supporting pet owners to compare the offerings of different FOPs and referral providers

● Question 12: What information should be displayed on a price comparison site and how? We are particularly interested in views in relation to composite price measures and medicine prices.

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● Question 13: How could a price comparison website be designed and publicised to maximise use and usefulness to pet owners? Please explain your views.

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● Question 14: What do you think would be more effective in addressing our concerns - (a) a single price comparison website operated by the RCVS or a commissioned third party or (b) an open data solution whereby third parties could access the information and offer alternative tools and websites? Why?

I would probably go with a if you are going for it

● Question 15: What are the main administrative and technical challenges on

FOPs and referral providers in these remedy options? How could they be resolved or reduced?

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● Question 16: Please comment on the feasibility of FOPs and referral centres providing price info for different animal characteristics (such as type, age, and weight). Please explain any specific challenges you consider may arise.

It just gets hugely complicated and different centres have different schemes- indeed often places I have worked change every so often as no scheme is perfect

Again this will all affect smaller practices worse by the workload created

● Question 17: Where it is appropriate for prices to vary (eg due to bundling or complexity), how should the price information be presented? Please explain your views.

That is very difficult to present in a standard manner. I would say on a practice basis as per there booking system but then comparison is going to be hard

● Question 18: What do you consider to be the best means of funding the design, creation and ongoing maintenance of a comparison website? Please explain your views.

Adverts in bottom corner?? Not commission

Remedy 3: Require FOPs to publish information about pet care plans and minimise friction to cancel or switch

● Question 19: What would be the impact on vet business of this remedy

option? Would the impact change across different types or sizes of business?

Please explain your views.

Possible and seem sensible

● Question 20: How could this remedy affect the coverage of a typical pet plan? Please explain your views.

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● Question 21: What are the main administrative and technical challenges on FOPs and referral providers with these remedy options? How could they be resolved or reduced?

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Remedy 4: Provide FOP vets with information relating to referral providers

● Question 22: What is the feasibility and value of remedies that would support FOP vets to give pet owners a meaningful choice of referral provider? Please explain your views.

To be honest it changes so much you would end up picking up the phone anyway. Shortages of vets at referral centres leading to not being able to offer services either all days or 24/7 or when certain clinicians are off has lead to the current system

Trying to accurately write down the neurology avalibilty of east neuk, dick vet, Glasgow and vets now Glasgow when it is probably one or 2 clinicians doing all the work between them and a single mri machine- as for the costs- that's why you phone and get a quote

● Question 23: Are there any consequences which may be detrimental and if so, what are they?

● **Question 24: What do you consider are likely to be the main administrative, technical and administrative challenges on referral providers in this remedy? Would it apply equally to different practices? How could these challenges be reduced?**

● **Question 25: If you are replying as a FOP owner or referral provider, it would be helpful to have responses specific to your business as well as any general replies you would like to make.**

See my response about price list for referral ops- I would suggest either an in house price or a list of “preferred or optional referral centres”

● **Question 26: What information on referral providers that is directly provided to pet owners would effectively support their choice of referral options? Please explain your views.**

Remedy 5: Provision of clear and accurate information about different treatments, services and referral options in advance and in writing

● **Question 27: If a mandatory requirement is introduced on vet businesses to ensure that pet owners are given a greater degree of information in some circumstances, should there be a minimum threshold for it to apply (for example, where any of the treatments exceed: £250, £500, or £1,000)? Please explain your views.**

● **Question 28: If a requirement is introduced on vet businesses to ensure that pet owners are offered a period of ‘thinking time’ before deciding on the**

purchase of certain treatments or services, how long should it be, should it vary depending on certain factors (and if so, what are those factors), and should pet owners be able to waive it? Please explain your views.

● Question 29: Should this remedy not apply in some circumstances, such as where immediate treatment is necessary to protect the health of the pet and the time taken to provide written information would adversely affect this? Please explain your views.

This sounds a wise idea- however in reality to prevent my entire day clogging up I would be struggling to write any letters with detailed treatment options at the time of consult

Is ai going to write them for us and is that really progress.....

I would have serious thoughts before implementing this stage of the recommendations - especially when you take it over to the equine and farm side of things. Am I writing written reports cow side on all the different treatments options available?

Or do I remember the conversation till I get back to office and then send a copy of letter with the options the farmer refused.

● Question 30: What is the scale of the potential burden on vets of having to keep a record of treatment options offered to each pet owner? How could any burden be minimised?

This is massive and will be disproportionately larger for smaller practices, again I believe this was not the intention of the cma and will stop the flush of new internet we have had in the last 5 years

● Question 31: What are the advantages and disadvantages of using treatment consent forms to obtain the pet owner's acknowledgement that they have been provided with a range of suitable treatment options or an explanation why only one option is feasible or appropriate? Could there be any unintended consequences?

Huge investment in operating systems and again benefits the corporate big boys in my opinion

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● Question 32: What would be the impact on vet businesses of this remedy option? Would any impacts vary across different types or sizes of business? What are the options for mitigating against negative impacts to deliver an effective but proportionate remedy?

As per my 31 answer it is going to massively disproportionately affect smaller and more traditional businesses.

● Question 33: Are there any barriers to, or challenges around, the provision of written information including prices in advance which have not been outlined above? Please explain your views.

Vet time

● Question 34: How would training on any specific topics help to address our concerns? If so, what topics should be covered and in what form to be as

impactful as possible?

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● Question 35: What criteria should be used to determine the number of different treatment, service or referral options which should be given to pet owners in advance and in writing? Please explain your views.

If there is more than one way to treat a condition it means none of them work very well.....

In all seriousness this is so variable between conditions, usually a watchful waiting, minimal intervention, normal fop and gold standard so 4 would be possible but totally not applicable to some conditions where there are 2 options

Remedy 6: Prohibition of business practices which limit or constrain the choices offered to pet owners

● Question 36: Are there any specific business activities which should be prohibited which would not be covered by a prohibition of business practices which limit or constrain choice? If so, should a body, such as the RCVS, be given a greater role in identifying business practices which are prohibited and updating them over time? Please explain your views.

A panel of RcvS members should adjudicate any issues regarding this issue

● Question 37: How should compliance with this potential remedy be monitored and enforced? In particular, would it be sufficient for FOPs to carry out internal audits of their business practices and self-certify their compliance? Should the audits be carried out by an independent firm? Should a body, such as the RCVS, be given responsibility for monitoring compliance? Please explain your views.

Should be looked at at the practice standards inspection- check individual vets

● **Question 38: Should there be greater monitoring of LVGs' compliance with this potential remedy due to the likelihood of their business practices which are rolled-out across their sites having an impact on the choices offered to a greater number of pet owners compared with other FOPs' business practices? Please explain your views.**

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● **Question 39: Should business practices be defined broadly to include any internal guidance which may have an influence on the choices offered to pet owners, even if it is not established in a business system or process? Please explain your views.**

Yes- though it is hard to separate these from " culture" sometimes

Remedy 7: Changes to how consumers are informed about and offered
Prescriptions

● **Question 40: We would welcome views as to whether medicines administered by the vet should be excluded from mandatory prescriptions and, if so, how this should be framed.**

"Drugs for use outwith the consult room should be given the offer of a mandatory prescription "

● **Question 41: Do these written prescription remedies present challenges that we have not considered? If so, how might they be best addressed?**

Vet time

Paper!!!! A written prescription every consult just for someone to walk to front desk!

● **Question 42: How might the written prescription process be best improved so that it is secure, low cost, and fast? Please explain your views.**

No requirement for written

Requirement to always send a prescription to front desk which can be electronic, and then if client wishes they can have it printed and signed

Double opportunity to discuss the cost saving benefits, stops wasted in house prescriptions - I've just realised this is basically option C

● **Question 43: What transitional period is needed to deliver the written prescription remedies we have outlined? Please explain your views.**

Would depend on which one

A- none

B- none

C- 6 months

D- 1-2 years- operating systems and it required

E-1-2 years operating systems and it required

Remedy 8: Transparency of medicine prices so pet owners can compare between FOPs and other suppliers

● **Question 44: What price information should be communicated on a prescription form? Please explain your views.**

Cost per dose for your animal

Cost per script volume

● **Question 45: What should be included in what the vet tells the customer when giving them a prescription form? Please explain your views.**

Other sources than ourselves are available- here is a link to Google

● **Question 46: Do you have views on the feasibility and implementation cost of each of the three options? Please explain your views.**

Operating systems could be costly for the last 2 options, again affects smaller practices worse

Remedy 9: Requirement for generic prescribing (with limited exceptions) to increase inter brand competition for medicine sales

● **Question 47: How could generic prescribing be delivered and what information would be needed on a prescription? Please explain your views.**

I am not in favour of generic prescribing but believe a free transfer should be offered for an alternative brand- this could be stated in large letters at the base of the script

● **Question 48: Can the remedies proposed be achieved under the VMD prescription options currently available to vets or would changes to prescribing rules be required? Please explain your views.**

I would be extremely worried about the cascade and the importation of drugs of the wrong type if we moved to all actives only prescriptions- especially farm animals and the use of these drugs in small animals

● **Question 49: Are there any potential unintended consequences which we should consider? Please explain your views.**

The ripping apart of the cascade system

Equine prescriptions for example would be ridiculous

● **Question 50: Are there specific veterinary medicine types or categories which could particularly benefit from generic prescribing (for example, where there is a high degree of clinical equivalence between existing medicines)? Please explain your views.**

No I think an offer of free transfer of script if alternative product found and a good list in e.g Noah of equivalents would be enough

● **Question 51: Would any exemptions be needed to mandatory generic prescribing? Please explain your views.**

I am not in favour but put it this way, I'm on anti epileptic medication and I'm not allowed to take generics only the brand version. I think as soon as you open up generic only prescribing it becomes very dangerous

● **Question 52: Would any changes to medicine certification/the approval processes be required? Please explain your views.**

● **Question 53: How should medicine manufacturers be required to make information available to easily identify functionally equivalent substitutes? If so, how could such a requirement be implemented?**

Hard with the number of foreign imports we are having to use currently.

Large size dose and active with smaller brand size?

● **Question 54: How could any e-prescription solution best facilitate either (i) generic prescribing or (ii) the referencing of multiple branded/named medicines. Please explain your views.**

They could automatically tell you brands available

Or could automatically add brands on that matches the brand you wrote- this may be best solution

Remedy 10: Prescription price controls

● **Question 55: Do you agree that a prescription price control would be required to help ensure that customers are not discouraged from acquiring their medicines from alternative providers? Please explain why you do or do not agree.**

Yes that sounds fair enough

● **Question 56: Are there any unintended consequences which we should take into consideration? Please explain your views.**

You are now mandating a minimum price per drug - possibly above current prices

● **Question 57: What approach to setting a prescription fee price cap would be least burdensome while being effective in achieving its aim of facilitating competition in the provision of medicines?**

If we were to decide to impose a cost based price control for prescriptions, we need to fully understand the costs involved with prescribing and dispensing

activities. We are seeking to understand:

● **Question 58: What are the costs of writing a prescription, once the vet has decided on the appropriate medicine?**

Time- takes bloody ages, and often minor mistakes that need rectification at some point,

Copying for records

Attachment to records

● **Question 59: What are the costs of dispensing a medicine in FOP, once the medicine has been selected by the vet (i.e. in effect after they have made their prescribing decision)?**

Label

Reception/ vet time making up

Remedy 11: Interim medicines price controls

● **Question 60: What is the most appropriate price control option for limiting further price increases and how long should any restrictions apply for?**

Please explain your views.

● **Question 61: If we aim to use a price control to reduce overall medicine prices, what would be an appropriate percentage price reduction? Please explain your views.**

It should be a % mark up on list price from wholesalers

● **Question 62: What should be the scope of any price control? Is it appropriate to limit the price control to the top 100 prescription medicines? Please explain your views.**

Sounds good to me

● **Question 63: How should any price control be monitored and enforced in an effective and proportionate manner? Please explain your views.**

Monitor prices in 20 random vet practices of the 100 products

Implementation of remedies 7 – 11

● **Question 64: We welcome any views on our preferred system design, or details of an alternative that might effectively meet our objectives. Please explain your views.**

Sounds like it needs a very efficient and well funded operant system to run.

Almost like the corporate groups will be able to work it instantly but independent practices will struggle to get the resources together to integrate the system, or are the CMA funding the installation

● **Question 65: What do you consider to be the best means of funding the design, creation and ongoing maintenance of an e-prescription portal and price comparison tool? Please explain your views**

This is my major worry. And it is not so much the portal but the technology to run the portal.

Remedy 12: Restrictions on certain clauses in contracts with third-party out of hours care providers

● **Question 66: What would be an appropriate restriction on notice periods for the termination of an out of hours contract by a FOP to help address barriers to FOPs switching out of hours providers? Please explain your views.**

3 months

Plenty notice for staff contracts

● **Question 67: What would be an appropriate limit on any early termination fee (including basis of calculation) in circumstances where a FOP seeks to terminate a contract with an out of hours provider? Please explain your views.**

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Remedy 13: Transparency on the differences between fees for communal and individual cremations

● **Question 68: Do you agree that the additional transparency on the difference in fees between fees for communal and individual cremations could helpfully be supplemented with revisions to the RCVS Code and its associated guidance? Please explain your views.**

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Remedy 14: A price control on cremations

● **Question 69: If a price control on cremations is required, should this apply to all FOPs or only a subset? What factors should inform which FOPs any such price control should apply to?**

All

● **Question 70: What is the optimal form, level and scope of any price control to address the concerns we have identified? Please explain your views.**

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● **Question 71: For how long should a price control on cremations be in place? Please explain your views.**

10 years

● **Question 72: If a longer-term price control is deemed necessary, which regulatory body would be best placed to review and revise such a longer-term price control? Please explain your views.**

Trading standards

Remedy 15: Regulatory requirements on vet businesses

● **Question 73: Would regulating vet businesses as we have described, and for the reasons we have outlined, be an effective and proportionate way to address our emerging concerns? Please explain your views.**

This sounds good to me.

The RcvS struggles presently

Remedy 16: Developing new quality measures

● **Question 74: Are there any opportunities or challenges relating to defining and measuring quality which we have not identified but should take account of? Please explain your views.**

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● **Question 75: Would an enhanced PSS or similar scheme of the kind we have described support consumers' decision-making and drive competition between vet businesses on the basis of quality? Please explain your views.**

Yes this is a wise idea. And extra schemes should be incorporated into the pss,

● **Question 76: How could any enhancements be designed so that the scheme reflects the quality of services offered by different types of vet businesses and does not unduly discriminate between them? Please explain your views.**

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● **Question 77: Are there any other options which we should consider?**

Remedy 17: A consumer and competition duty

● **Question 78: Should any recommendations we make to government include that a reformed statutory regulatory framework include a consumer and competition duty on the regulator? Please explain your views.**

Yes this is a wise idea

● **Question 79: If so, how should that duty be framed? Please explain your**

views.

Remedy 18: Effective and proportionate compliance monitoring

● **Question 80: Would the monitoring mechanisms we have described be effective in helping to protect consumers and promote competition? Please explain your views.**

These sound like good pro active ideas- I like the FCA equivalent idea

● **Question 81: How should the monitoring mechanisms be designed in order to be proportionate? Please explain your views.**

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● **Question 82: What are the likely benefits, costs and burdens of these monitoring mechanisms? Please explain your views.**

No more than the RcvS takes currently but without having enough power

● **Question 83: How could any costs and burdens you identify in your response be mitigated and who should bear them? Please explain your views.**

RcvS should split / share costs

Remedy 19: Effective and proportionate enforcement

● **Question 84: Should the regulator have powers to issue warning and**

improvement notices to individuals and firms, and to impose fines on them, and to impose conditions on, or suspend or remove, firms' rights to operate (as well as individuals' rights to practise)? Please explain your views.

Yes

● Question 85: Are there any benefits or challenges, or unintended consequences, that we have not identified if the regulator was given these powers? Please explain your views.

Remedy 20: Requirements on businesses for effective in-house complaints Handling

● Question 86: Should we impose a mandatory process for in-house complaints handling? Please explain your views

Yes - sounds wise.

● Question 87: If so, what form should it take? Please explain your views.

Remedy 21: Requirement for vet businesses to participate in the VCMS

● Question 88: Would it be appropriate to mandate vet businesses to participate in mediation (which could be the VCMS)? Please explain your views.

Yes

● Question 89: How might mandatory participation in the VCMS operate in

practice and are there any adverse or undesirable consequences to which such a requirement could lead?

● **Question 90: How might any adverse or undesirable consequences be mitigated?**

Remedy 22: Requirement for vet businesses to raise awareness of the VCMS

● **Question 91: What form should any requirements to publicise and promote the VCMS (or a scheme of mediation) take?**

Remedy 23: Use of complains insights and data to improve standards

● **Question 92: How should the regulatory framework be reformed so that appropriate use is made of complaints data to improve the quality of services provided?**

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Remedy 24: Supplementing mediation with a form of binding adjudication

● **Question 93: What are the potential benefits and challenges of introducing a form of adjudication into the sector?**

Mainly benefits tbh

● **Question 94: How could such a scheme be designed? How might it build upon the existing VCMS?**

● **Question 95: Could it work on a voluntary basis or would it need to be statutory? Please explain your views.**

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Remedy 25: The establishment of a veterinary ombudsman

● Question 96: What are the potential benefits and challenges of establishing a veterinary ombudsman?

Excellent idea

● Question 97: How could a veterinary ombudsman scheme be designed?

Like the children's panel - panel of average people whom dedicate there time to being a panel- expert opinion could be gained if required

● Question 98: Could such a scheme work on a voluntary basis or would it need to be statutory? Please explain your views

I would make it statutory, it would report the worst issues to the RcvS to do what it does currently .

Remedies 26 – 28: Effective use of veterinary nurses

● Question 99: What could be done now, under existing legislation, by the RCVS or others, to clarify the scope of Schedule 3 to the VSA?

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● Question 100: What benefits could arise from more effective utilisation of vet nurses under Schedule 3 to the VSA, in particular for the veterinary profession, vet businesses, pet owners, and animal welfare? Might this result in any unintended consequences?

Yes- over use of nurses and therefore no jobs available for new grads. Lack of “simple “ ops to learn on and a bunch of even less confident and experienced young vets

● **Question 101: What benefits could arise from expansion of the vet nurse's role under reformed legislation, in particular for the veterinary profession, vet businesses, pet owners, and animal welfare? Might this result in any unintended consequences?**

See my answer for 100

Proportionality

● **Question 102: Do you agree with our outline assessment of the costs and benefits of a reformed system of regulation? Please explain your views.**

It's just more and more costs for small businesses to face. A lot of these costs are flat per business and so encourage lack of competition by their very being

● **Question 103: How should we develop or amend that assessment?**

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● **Question 104: How could we assess the costs and benefits of alternative reforms to the regulatory framework?**

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● **Question 105: How should any reformed system of regulation be funded (and should there be separate forms of funding for, for example, different matters such as general regulatory functions, the PSS (**