



Society of Practising Veterinary Surgeons
(SPVS) and Federation of Independent
Veterinary Practices (FIVP) Joint
submission to CMA Remedies
May 26th 2025

Table of Contents

1	<i>Executive Summary</i>	4
2	<i>Introduction</i>	5
3	<i>The approach to the Response</i>	6
4	<i>Independent Veterinary Sector Considerations</i>	7
4.1	Diversity of Independent Practices	7
4.2	Autonomy and independence	7
4.2.1	Key points.....	8
4.3	IT adoption	8
4.3.1	Key points.....	8
4.4	Professional management	8
4.5	Practice profitability and Returns on Investment.....	9
4.5.1	Summary	10
5	<i>Client Expectations</i>	10
5.1.1	Key points.....	11
6	<i>CMA Objectives of the investigation and key concerns</i>	12
6.1	Constraints and limitations	14
7	<i>Consultation methodology</i>	15
7.1	The Proposed Remedies May 2 nd , 2025.....	16
7.1.1	Future considerations.....	17
8	<i>Survey Results</i>	18
8.1	Level of knowledge and understanding	19
8.2	Practice size	19
8.3	Ranking of the importance of the general concerns re proposed Remedies	20
8.4	Impact Assessment to proposed Remedies.....	22
8.5	Mandatory Prescriptions, QR code and E- Portal	24
8.6	Comparison Website - Alternative options.....	27
8.7	Client information Site.....	29
8.8	Improving the awareness of prescriptions	32
9	<i>Summary</i>	34
9.1	Remedy emphasis	34
9.2	Behaviour changes vs Mandating change	34
10	<i>Conclusions</i>	36
	<i>Appendix A</i>	38
	The 2024 Survey of the Veterinary Profession report	38
	<i>Appendix B. Consultation meetings with SPVS and FIVP members</i>	40

CMA SPVS Meeting to discuss CMA Remedies 13/5/2025	40
Veterinary Practice Estimates, Treatment Options and Client Signoffs	44
<i>Summary SPVS FIVP Meeting with Members</i>	45
<i>Appendix C :SPVS Survey CMA Remedies May 2025</i>	47

1 Executive Summary

SPVS and FIVP submit this response to the CMA's proposed remedies with significant reservations regarding their potential impact on independent veterinary practices. While supportive of the goals of increased transparency and client choice, our analysis, informed by a recent member survey, reveals critical concerns. The proposed remedies risk distorting the market by disproportionately burdening smaller practices, undermining the vet-client relationship, and potentially leading to increased costs for pet owners. Mandatory prescriptions and price comparisons, in particular, raise significant practical and ethical issues. This submission outlines these concerns in detail, presenting evidence-based arguments and proposing alternative, proportionate solutions that prioritize client education, support a diverse veterinary market, and safeguard animal welfare. We urge the CMA to carefully consider these recommendations and adopt a collaborative approach to implementation, ensuring a sustainable and resilient veterinary sector.

2 Introduction

We welcome the opportunity to provide further feedback on the proposed CMA Remedies - Vets Market Investigation Working Paper.

Our response is a joint response from the Society of Practising Veterinary Surgeons (SPVS) and the Federation of Independent Vets (FIVP)

The **Society of Practising Veterinary Surgeons (SPVS)** whose mission is to provide a supportive membership community offering representation and industry-leading guidance for leaders in veterinary practice. We provide annual surveys of salaries, fees and profits for our members and are not for profit membership organisation focusing on enabling practices to thrive by improving leadership, management, self-development and teamwork. Our members are from a wide variety of practices- independent, corporate and also within with wider profession.

The **Federation of Independent Veterinary Practices (FIVP)** is a not-for-profit organisation that represents the interests and promotes the values of independent veterinary practices. Our members are locally owned businesses that place owners and their pets at the heart of everything they do. FIVP offers a wide variety of member services including personalised employee resourcing, representation at university careers events promoting independent roles, online member forum, webinars and podcasts and more.

We fully support the aims of the CMA investigation. Independent practices value working within a free and independent marketplace which is provides transparency and choice for clients

The feedback from the Independent Practices consulted with, within our memberships is:

- **They are in full support of Transparency and Choice**, recognising that as private practices operating in the marketplace, delivering a client-centric service is crucial for their success.

- **They advocate for enhanced regulation**, the promotion of VCMS, legal protections for the title ‘vet nurse,’ and the consideration of this role in future developments.
- **However, they oppose the mandatory implementation of measures to ensure Transparency and Choice** in the prescribing and dispensing of medicines without a comprehensive impact assessment and thorough testing of any proposed measures.
- They are against **complex solutions that may disproportionately affect their businesses** through a “one size fits all” approach.
- They are willing to work closely with the CMA to develop **more practical solutions that align with the aims of the CMA that are less harmful** to independent practices.

3 The approach to the Response

SPVS has 3 members contributing towards the BVA joint working group with further support from the Board. SPVS supports the BVA remedies proposed.

FIVP is a CMA main party and has made direct responses to the CMA and sits independent of the BVA working group but is also supportive of the submissions made by BVA.

In this response we will focus therefore on the specific areas that may impact upon independent practices that may not have been fully explored within the BVA submission and discuss general approaches that will maximise the achievement of CMA objectives.

An e-survey of veterinary professionals working in practice, seeking feedback on key elements of the CMA remedies was initiated by SPVS on May 18th. Provisional data will be shared within this report with a fuller report being made available later.

4 Independent Veterinary Sector Considerations

4.1 Diversity of Independent Practices

To fully appreciate the challenge, we must understand the nuances of both the marketplace and drivers within the independent practices.

In a proportion of practices profit may not be the primary motivator. Vets can be driven by clinical satisfaction, desire to secure a work life balance or other success factors relevant to themselves. The diversity extends further to the clients who value this level of diversity and choice provided. The wide range of drivers behind how clients choose veterinary practices was a key part of your data gathering.

The challenge lies with the imposition of remedies that, through unintended consequence, forces the practice to pursue profit as a primary objective. Greater competition will have disproportionate effect on any practice or branch with lower levels of profitability (practice or branch). It is generally accepted that the Independents have higher levels of cost than those within a larger group practice/ LVG and this can serve to erode competitive advantage. Consolidation is a significant driver within the profession as this allows practices to secure better terms and spread their overheads more easily.

4.2 Autonomy and independence

The independent sector put a huge price on autonomy of decision making and controlling their own destiny within the confines of the RCVS Professional Guidelines.

This can be highly significant to our members and a number were upset at the prospect of being pushed into a position where they could no longer even control the medicines that the practice would prefer to supply. The only consideration was the price of the medicine irrespective of the preferred brand they were confident and experienced in using. This was especially the case if they sensed that a competitor LVG / pharmacy was forcing that change. This is just one small example of how changes can trigger strong feeling within a profession that already suffers from poor mental wellbeing. If competition is to work effectively then we need to ensure that the

independent sector continues to thrive and increases both the supply and variety of veterinary practices.

4.2.1 Key points

- Providing space for Autonomy and Independent thinking is important for successful engagement
- Minimising Remedies which cause stress, anxiety and frustration are important to avoid impact on retention and further consolidation.

4.3 IT adoption

The Independent sector has widely different economies of scale (start-ups vs larger groups) with differing motivators and values and modus operandi. There is a highly variable adoption of IT within veterinary practices. The decisions are made according to the needs of the business and also personal factors.

For the practices that are clinically focused (rather than financially driven) there is often an absence of the forensic financial data to help manage change.

The multispecies practices will often have a single Profit and Loss and insufficient information on the impacts of x or y on a particular sub sector of their business.

Approximately 20 PMS systems are thought to be operational in the UK with 8 having the largest market share. They all differ in their ability to deliver functions such as prescriptions or processes intimated within the remedies. Whilst this variation and choice is welcome it is essential that time is provided to ensure that PMS providers can adapt and prioritise their programming time to adopt any changes. Changing a PMS system is a major activity and is not undertaken lightly.

4.3.1 Key points

- IT solutions are essential to aid with the delivery of remedies
- Multiple PMS providers will require co-ordinated support to ensure synchronous delivery of solutions.

4.4 Professional management

Typically, the management and leadership of the practice is undertaken by the owners of the practice in smaller independent practices. This work is often performed out with the working day and on top of the existing clinical workload. If more

demands are put on the owners, then this will be at the expense of their personal time, other management duties or clinical inputs. Adding more complexity to their work will mean that costs will have to rise to employ other people to do the work. The utilisation of fully trained full time qualified practice managers is only afforded once a critical mass of turnover and practice size achieved (typically greater than 30-40 employees). Smaller practices often avoid the need to employ through contracting out HR and financial elements to third parties (HR companies, Accountants). This would mean extra work would fall on the owners to do.

Competition is driven by both the entrant of new practices and the retention of existing independent practices. Both parties may be affected by the remedies proposed. Some elements of this have been captured within the survey data. Undue complexity and rules risks damaging both of those groups leading to lower levels of choice for clients and higher risk of poorer animal welfare (higher fees, clinic closures, reduced services). The loss of senior leaders within the profession has led to significant impacts on practice support and performance. The leaders within independent practices are acutely aware of the potential challenges from the CMA remedies but remain constructive in terms of their support of any sensible, achievable changes

4.5 Practice profitability and Returns on Investment

The profitability of independent practices is highly variable due to the nature of the size, maturity and priorities of the business. This differs from the LVG where the practices are purchased to meet the strategic objective of improving profits and synergies for the company.

Labour costs have risen to nearly 44-48% of turnover. Medicine purchases are typically 30% of turnover within independent practices. Profits are under pressure. The most recent SPVS profitability survey (2023) of a small data set of 17 practices revealed that for 34% of respondents the EBITDA was less than the expected target of 15% of turnover. Half of these lower profit practices had negative EBITDA.

New and potential owners who have secured funds to purchase a share within the practice are particularly exposed to a downturn in profits.

Bank lending has been restricted in some instances, to incoming owners, subject to the finalisation of the CMA investigation.

As competition increases the practices with best value proposition will thrive.

The concern expressed from members has been that “price” has been defined as the most important consideration, and this skews the market opportunity towards the practices that can secure the lowest price offering rather than providing an opportunity for more comprehensive comparison of value and quality.

The potential largest unintended consequence is more rapid exit of current owners from practice. The traditional practices, often with lower-than-average prices, and more personalised service are outcompeted by larger groups. This directly impacts onto choice, diversity and client service.

4.5.1 Summary

Within independent practices there is an acceptance of:

- Greater diversity of practice type (size, profits, values, management, IT systems) than within with LVG sector.
- A wider range of drivers for practice owners - profit and price typically is less of a motivator
- Autonomy and independence are more important
- Any centralised remedy will have differing outcomes dependent on practice type
- Profitability is more variable than LVG's where there are clearer systems and processes to support the delivery of consistent financial returns.
- Wide range of professional management support and IT solutions

5 Client Expectations

Over recent years there has been a huge shift in client expectations. The humanisation of the pet/ owner bond, the TV exposure of what can be done with high tech solutions and the availability of higher quality diagnostics/ treatments, has fuelled a huge rise in client expectations.

The RCVS Survey of the Profession 2024 (Appendix A) of over 2000 vets highlighted that the major challenges identified by the vets were **client expectations, stress, staff shortages, affordability of veterinary services and changing structures in ownership.**

The top 5 key potential areas identified in this survey for improvement centred on **better financial reward, less workload pressure, managing client expectations, more respect from the public and less regulation and bureaucracy**

Increased client expectations and complexity of veterinary care has extended consult lengths from 10 to 15-20 minutes since 2012 (SPVS data).

The challenge of keeping on time and managing the client expectations is problematic. Adding any further complexity or length to consultations will be difficult and is the predominant concern identified within the e-survey.

Unless client expectation is managed or met, then irrespective of the remedies provided, client satisfaction may not be achieved. Simply providing improved choice in medicine supplier will not for instance help the client navigate and pay for a complex medical or surgical intervention that they may demand. Equally, just expecting more to be done within the consult room may not improve the overall quality of the client experience. A balanced and practical mechanism must be found to deliver choice and transparency without causing client confusion, extended consultations and higher costs.

5.1.1 Key points

- Expectation management could be a central objective to help clients make the right choices by the development of centralised resources to educate and inform clients better (pet, practice, treatment)
- Access to information, out of the consult room, that strengthens the client knowledge will help facilitate contextualised care and effective decision making. Choice without support = confusion.
- Trialling out a variety of knowledge transfer information methods may be a more sympathetic method to achieve the CMA objectives of improving transparency and choice.
- Any centralised website is not substitute for face-to-face discussions with a secure Vet Client Pet Relationship (VCPR)

6 CMA Objectives of the investigation and key concerns

The primary objectives of the CMA Investigation are insightful. The primary focus was on Transparency and Choice.

- 1. Consumers are getting the information they need, at the right time, to make informed decisions*
- 2. A limited choice of vet businesses in some local areas is impacting pet owners*
- 3. Profits earned are consistent with the levels expected in a competitive market*
- 4. Vet businesses have the incentive and ability to limit consumer choice when providing treatments or recommending related services, particularly when they are part of large integrated groups*
- 5. The regulatory framework is preventing the market from functioning as well as it could*

Independent practices fully support the objectives of the investigation. Providing information to consumers to aid their decision making and optimal working with the veterinary practice is essential. We also welcome the need to provide consumer choice in terms of veterinary practice. The diversity of independent practices provides consumers with much needed choice within an increasingly consolidated marketplace.

The CMA investigation has been helpful in highlighting the opportunities where both practices and the regulation of practices can further improve to deliver improved transparency and choice.

In preparing this report we have referenced the key considerations outlined in the introductory statements and CMA documents.

We have actively campaigned for our members to share their concerns and potential solutions with you directly. Each practice is different, and this highlights the challenges of any “one size fits all” solutions.

The independent practices are central to improving the retention and career opportunities for practising vets and long-term sustainable growth. They provide a diverse range of service types which are highly valued by their clients.

We must also ensure that the barriers to entry are not unwittingly increased due to the enhanced efforts to mandate transparency and choice.

The areas we are mindful therefore are the proportionality of the remedy compared to the aims and the potential disadvantage that a structural remedy may produce. Balancing off the aims and harms is problematic within a highly diverse business landscape where some may gain, and others lose due to their scale or operation.

The **compliance costs** (time, IT and finance) are not insignificant for several of the proposed remedies, and our consultation exercise has revealed that simpler remedies may be equally effective at much lower cost.

Animal welfare is central to the role of the veterinary practice. In our opinion the focus of some of the remedies risks removing time for clinical consulting time and directing this towards pricing or transparency processes within the clinic. Any change that also triggers further consolidation of clinics and closures of branch clinics due to economic pressure will reduce access. Several of the remedies are exclusively IT dependent and these risks discrimination against practices and clients who are less IT knowledgeable.

The focus of several of the remedies increase the **burden of responsibility on the veterinary practice** to deliver. This immediately generates a bias that benefits practices/groups that have scale and centralised professional management structures. There is little within the remedies that help manage client expectation or empower and inform the client to get the best from their interaction with the veterinary practice. This is missed opportunity in our opinion.

The focus on fixed or mandated remedies heightens the risk of market distortion and unintended consequences. We had anticipated that more would be done to bridge the gap between vet and client to alter market dynamics rather than mandatory solutions with unpredictable consequences

Managing client expectations and client education may be more efficient and appropriate methods of altering behaviours and markets than mandatory remedies that directly affect in practice processes.

Improving client knowledge and encouraging more proactive engagement with the vet professional allows a free well-functioning market to develop and flourish in a sustainable way.

We welcome that you acknowledge that the **timeframes and consequences** of any changes need to be carefully considered to avoid further disadvantaging individuals or groups. This is essential within an independent practice sector which do not benefit from single PMS systems or have clearly established pathways for processes to be embedded.

There are concerns also that the **deployment of multiple remedies** within a marketplace, which has changed since 2024, will result in an “overshoot”. Many practices are experiencing a decline in demand for the first time in several years. The market has been operating for several years where demand has hugely exceeded supply of veterinary services and available labour.

We also value that the CMA recognises that the veterinary profession works hard to satisfy client needs and the profession does deliver a hugely valuable service to their clients. The Net Promoter Score for practices is typically greater than 80.

6.1 Constraints and limitations

The lack of a **detailed impact assessment and profit analysis data** make it even more challenging to objectively review the importance of each remedy fully. There are several variables which have not been defined which would hugely impact the outcome for an any single remedy (e.g. price capping prescriptions at lower or above the market rate, degree of uptake, effect of other remedies on another etc).

The impact assessment of a single remedy cannot be fully evaluated without certainty of the final solutions proposed. Each remedy is not independent of the impacts of other recommended changes and if deployed synchronously this adds further complexity to predicting the outcome.

The **Profit analysis data will also heavily influence the considerations**. If more practice sites are marginally profitable than expected, then the impact of clinic closure and consequent animal welfare/ client choice may be more relevant as an impact. Responding to the remedies without full access to all the data, and the tight time frames, does compromise the consultation process.

The joint SPVS / FIVP response therefore is focusing on the key areas below with specific reference to **Independent Practices**.

7 Consultation methodology

The memberships of both our organisations have been kept informed throughout the review and investigation phase. We have hosted CMA panel discussions and CPD sessions at the last 2 SPVS congresses.

Further CMA updates have been delivered by online member discussions and via the SPVS Forum and regular email updates.

Two consultation meetings with SPVS and FIVP members were held on May 13th and 19th which highlighted several concerns but also resulted in discussions on practical solutions. The summary transcripts and notes from these meetings are attached. (Appendix B)

More widespread consultation has been undertaken by distribution of an e-survey to explore the challenges and solutions to the CMA Remedies. (Appendix C). This survey can be examined in more detail later as we will be able to filter response by job role, level of knowledge etc

We have no intention of providing a detailed response to each of your questions as

these are provided within the BVA joint working party. However, we will identify potential remedy areas where independent practices may be harmed through unintended consequences and how Remedies can be altered to make them more achievable within the independent sector.

Our Focus areas of review relate to the independent sector

- **The proposed route or method for achieving the aims based on feedback**
- **any potential harms or additional considerations**
- **any unintended consequences that may occur because of the proposed remedies**
- **potential solutions that may be more proportional and less harmful to veterinary services delivered by independent practices.**

7.1 The Proposed Remedies May 2nd, 2025

The proposed Remedies are defined by themes and measures to:

- **increase transparency and pet owners' ability to compare between FOPs and referral providers.**
- **increase transparency and pet owners' ability to compare different treatments, services and referral options.**
- **provide additional information about the option to purchase online and increase online purchases of medicines**
- **increase competition in outsourced OOH services.**
- **increase transparency of cremations prices; (potentially) measures to restrict retail prices.**
- **Provide recommendations for government, RCVS, VMD. Requirements on vet businesses to cover the regulatory gap until new legislation is in place**

The areas of greatest concern to the independent practices relate to the specifics of how to provide clients with more information, prescriptions, choices re medicine supply, potential compliance burden and unintended consequences (market distortion, interference with autonomy and processes, further consolidation, increasing barriers to entry and reducing diversity of practice type)

7.1.1 Future considerations

Within our discussions with members there are additional elements that have been discussed as to how the remedies will work if the marketplace shifts.

- Will the proposed remedies stand the test of time and provide the intended solution?
- Will the structural remedies posed have a differing and greater impact in a market where supply exceeds demand?
- How do the remedies work if the marketplace (practices, pharmacies, vertical integration) consolidates further?
- How will it work if there are multiple competing pricing comparison sites, with practices advertising to secure “poll” position as preferred provider largely based on price considerations alone?
- What scope is there for further alteration of the remedies if unintended consequences were to develop that were proven to damage competition, growth and the marketplace?

8 Survey Results

A survey was distributed on May 18th, 2025, to identify the level of engagement independent vet professionals had undertaken with the CMA Remedies and their opinions on proposed Remedies. The full summary of the Survey can be listed in Appendix C.

The survey was distributed via membership organisation via the SPVS, FIVP, VMG, Vet Dynamics, XLVets membership, Vetsure Buying group. Due to time constraints wider distribution through BVA and BSAVA, BVNA was not possible. A total of 342 replies were received by 10am 26th May 2025.

When a filter was applied to include only Independent practices, 262 replies formed the basis of the data provided below

Options exist to further filter the data by various parameters, and the intention is to keep the survey running for a further 10-14 days as this data may be helpful to the CMA.

8.1 Level of knowledge and understanding

What statement best represents your level of knowledge and understanding of the CMA Remedies?			
Answer Choices	Responses		
Totally conversant- Read the Remedies Document		18.32%	48
Aware of the major Remedies proposed		50.38%	132
Only partly aware of the Remedies		20.61%	54
Have limited knowledge about the proposed Remedies		9.92%	26
No idea about the proposed Remedies		0.76%	2
Answered: 262 Skipped: 0			Response Total: 262

18% respondent were totally conversant and had read the remedies document in detail, a further 50% were aware of the major remedies. A further 30% had part, limited or no idea about the remedies. This clearly illustrates the challenges of the consultation time frame (15 working days) and the difficulties engaging people with the complexity and breadth of the remedies proposed.

8.2 Practice size

How many FTE vets are there in your practice?			
Answer Choices	Responses		
1		5.34%	14
2-3		28.63%	75
4-7		25.19%	66
8-12		17.18%	45
13-20		10.31%	27
20+		13.36%	35
Answered: 262 Skipped: 0			Response Total: 262

The table provides and insight into the average size of the practices responding and was introduced to allow for subsequent filtering of data responses. 53% of respondents were from practices between 2-7 FTE vets.

8.3 Ranking of the importance of the general concerns re proposed Remedies

Please rank the following five CMA concerns about the proposed remedies in order of importance to you, with 1 being the most important and 5 the least important. Each concern must have a different rank – no duplicates. Note: As each item is ranked, the list will automatically update to reflect your selections.

Item	Total Score ¹	Overall Rank
Extra Compliance burden/ costs- extra reporting, pricing updates, IT etc	997	1
Damage to Vet Client Pet Relationship- erosion of Trust	930	2
Lost time during consultation explaining choices to clients	810	3
Overall reduction in practice profits	640	4
Lost revenue to pharmacies	553	5
Answered: 262 Skipped: 0		
¹ Score is a weighted calculation. Items ranked first are valued higher than the following ranks, the score is a sum of all weighted rank counts.		

Clearly the concerns about **compliance costs, damage to the VCPR and lost time in the consultation feature above the reduction in practice profits** and lost revenue to pharmacies. Any additional compliance costs, revisions to IT and reporting will impact directly on the practice owners within independent practices. Additional complexity to the consultations is a very sensitive area as the consultations are often “time bound” with limited ability to increase staffing or consult rooms. Finding ways to navigate the consultation time extension elements is hugely important for practices and ensuring remedies do not directly trigger further conversations that may not be relevant to the client is vital to avoid increasing the cost burden on all parties.

Trust and the VCPR are crucial elements to be maintained. Without this contextualised care is almost impossible to provide. A balance must be struck between achieving transparency and choice without generating a change in the dynamic between vet and client. Areas of potential trust erosion will occur with extensive discussions of price (where non is required), directly exposing the client to online prices in the consult room and forcing challenging price discussions onto every client irrespective of benefit or relevance.

Over emphasising Price when the client is struggling with concerns re their pet health can be met with great negativity from the client. “The vet was only

interested in the money". Simpler ways of normalising financial discussions where more clients are willing to have open conversations between client and vet regarding price need to be found.

Comments from respondents

- *Transparency in terms of procedures/ diagnostics and care plans are vital and often lacking due to time constraints in consult and clients' preconceived ideas of medicine. Providing a clear understanding of what to expect i.e. recheck consultations, recovery times, management of long-term diseases would be the most helpful technique for owner compliance. Owners still often think one consultation and a cream/ injection will fix their animal and with so many more treatments available and awareness of disease process now, it can be shocking how much time/energy/ money is required when owning a pet. Re-educating the public will be far more beneficial than pitting vets against each other*
- *The client must take responsibility for their pet (s) too. Advise all to get insurance. We are stuck in a nanny state at the moment, and the CMA are falling victim to this. Clients deserve information about treatment, costs, prognosis etc. but this is something that has been historically done during each consult. The VCPR is of utmost importance. The new term 'contextualised care' is the way I have been practicing for 25 years. I am dismayed at the level of control the CMA is trying to have over the veterinary sector. They are potentially going to reduce the number of independent practices further, drive up costs inadvertently and damage the relationship (further) between clients and vets. Many of the measures suggested are likely to be disastrous and so damaging to practices. One suggestion is to ask the CMA to lobby the government to remove VAT on veterinary medicines (and ideally services). This will help reduce costs to the client. Also, the notion of discounts from manufacturers based on volumes of products purchased must stop. I have been a director of an independent buying group for over ten years (IVBG). We have never been able to compete with corporate discounts.*
- *Tesco aren't forced to display prices from other competitor company's websites in-store. Why should small 1/2 branch independent vets?*
- *Clients need good relationship with known vet in order to build trust. This occurs face to face. Information is not knowledge, and people are already flooded with information, confused, anxious and needy.*

8.4 Impact Assessment to proposed Remedies

Do you agree or disagree with the following statements relating to the Veterinary Market Place? The proposed Remedies will....						
Answer Choices	Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Response Total
disproportionately affect the smaller, independent practices with less management support?	80.99% 213	15.21% 40	2.66% 7	0.76% 2	0.38% 1	263
may create advantages for Group practices to expand?	42.97% 113	30.04% 79	21.29% 56	4.56% 12	1.14% 3	263
create additional barriers to entry for start ups?	46.95% 123	37.02% 97	12.60% 33	2.29% 6	1.15% 3	262
accelerate the sale of practices due to increased pressure	44.91% 119	36.60% 97	13.58% 36	3.02% 8	1.89% 5	265
improve retention and motivation of veterinary professionals in practice?	1.89% 5	1.51% 4	6.79% 18	28.68% 76	61.13% 162	265
Answered: 262 Skipped: 0						

95% of respondents agree or strongly agree that the remedies will disproportionately affect the smaller independent practices with less management support.

73% agree or strongly agree that this may create advantages for Group practices to expand (Large corporate or Independent Groups)

Worryingly 83% agree or strongly agree the remedies, as proposed, will create barriers to entry for startups and a similar percentage envisage that it will accelerate the sale of independent practices due to increased pressure.

89% strongly disagree or disagree that the remedies will improve motivation and retention in practice.

Clearly the perception of the remedies is that the market will become distorted in favour of the Group practices and Independent Practices/Start up Practices will be disadvantaged.

Comments from Respondents

- “Allow practices to show the value of what client is getting for the cost not just generating figures which will be used as loss leaders or incomplete picture of treatment costs/add-ons”

- *“The problem with making any price list anywhere is that e.g. a routine haem/biochem/electrolyte blood test or a set of X-rays may be very expensive at one practice but their routine neuterings or dentals may be very cheap. So, it may involve people switching around between practices all the time. Also, it would then need updating every time there is a price change which is a lot of admin!!”*
- *What other profession or industry, before clients are allowed to purchase something, they are advised that it could be cheaper elsewhere? This seems disproportionate and anti-competitive as clients are funnelled in greater numbers towards buying from large corporations in one way or another. The large corporates themselves get huge volume discounts from their suppliers which small independent practices do not receive and therefore cannot possibly match the prices offered. Complete antithesis of the purported aims of the investigation as there is no level playing field.*

Recommendations:

- *Remedies are simplified and made less complex with a closer analysis of harms, costs and benefits undertaken.*
- *Time is provided for further development of IT solutions and processes to ease the changes required*
- *Closer analysis and impact assessments for each remedy are explored and “gamed out” to ensure market distortions are minimised*
- *Consideration is given to how smaller practices can be protected from the disproportionate impacts to limit barriers to entry and growth of the market place.*

8.5 Mandatory Prescriptions, QR code and E- Portal

The current CMA proposal is to provide clients with improved transparency and choice via MANDATORY prescriptions allowing the client to choose where to buy medicines from (own practice, other practice or pharmacy) Do you agree or disagree with the following statements.

Answer Choices	Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Response Total
Providing a QR code and lowest medicine price on their receipt is a proportionate measure to inform clients	3.05% 8	12.21% 32	16.03% 42	27.10% 71	41.60% 109	262
An e-portal that would allow prescriptions to be sent direct to pharmacy would simplify prescribing	9.16% 24	43.13% 113	17.18% 45	17.56% 46	12.98% 34	262
Mandatory prescriptions will provide choice and lower the OVERALL cost of care for clients	1.91% 5	7.63% 20	12.21% 32	32.06% 84	46.18% 121	262
Mandatory prescriptions are the most proportionate way to make clients aware of lower cost medicine providers	1.15% 3	4.20% 11	11.83% 31	38.17% 100	44.66% 117	262
Mandatory prescriptions will be popular with all clients	0.76% 2	4.20% 11	13.74% 36	51.53% 135	29.77% 78	262
Mandatory prescriptions will simply add cost to my business and reduce practice income	63.74% 167	28.24% 74	6.49% 17	0.38% 1	1.15% 3	262
Answered: 262 Skipped: 0						

Two thirds of respondents strongly disagree or disagree that providing a QR code and lowest medicine price on their prescription/ receipt would be a proportionate measure to inform clients. Feedback from members reveals that they are really concerned as to how this influences client flow, practicality, impact on both costs and reduction of income which would ultimately create a rise in client fees.

There was broad support for an e-portal to improve the efficiency, security and provision of prescriptions.

81% strongly disagreed or disagreed that mandatory prescriptions would provide choice and lower the overall cost of care for clients. A similar majority believed the measure was disproportionate to the aim of making clients aware of lower cost medicine providers and they also believed the measure would not be popular with clients. This impacts of this proposed remedy must be explored in more detail.

The practicalities of talking through the QR code system, the exclusivity challenges that creates with less IT knowledgeable clients and indeed having to discuss an option that may not be cost effective for low costs items are just some of the items raised. All remedies should cater for the widely diverse nature of the clients and not discriminate against particular vulnerable groups.

92% strongly agreed or agreed that mandatory prescriptions would add cost to their businesses. This is a concern in its current format. The prescription process in human medicine is more developed with trained “face to face” local pharmacists sharing part of the cost of delivery in return for income on the sale of the medicines. Within the veterinary profession the supply of medicines is embedded within the overall care package, complete with all the responsibility of managing the client through the whole process. The online pharmacists take little responsibility for supporting the client and are not able to do this in person.

Comments from respondents

- *“If mandatory prescription is to be the answer, professional fees will have to increase to compensate for lack of mark up. This will mean that owners will not be paying any less overall and will resent us charging appropriately for our professional time for once.”*
- *“I don’t think that CMA has a balanced view and does not understand the profession and care that is involved in veterinary treatment. The remedy is not proportional to the problem, which is with wholesale prices. We are not a supermarket.”*
- *“Giving clients more choice and information is not in itself a bad thing. The problem with the suggested resolutions is that they do not take into account that practices will have to find funding from somewhere and changes to medicine sales will result in a significant increase in professional fees that will likely impact independent practices more than those with the infrastructure in place to navigate change more efficiently.”*
- *I think a big issue is being missed here. I regularly discuss the option of written prescriptions with clients, especially when I am aware of cost concerns. However as a small independent vets I think the focus here needs to be on improving client understanding of why online pharmacies can provide medication so much cheaper than we can, and they need to be aware of the fact that many large corporate groups (vet and non-vet) own many online pharmacies. My serious concern here, especially if you are considering mandatory written prescriptions, is that you are directing a huge portion of our practice income away from a small business and into a large corporate pot. All that is doing is forcing small veterinary businesses into tough financial situations and supporting large corporate groups more. I think the focus needs to be on improving transparency, and making sure clients are aware of their options, but without compromising small businesses. Whatever information is made available to clients about online pharmacies and written prescriptions, it should make it clear that many of these are owned by large corporate companies who can sell medication often for cheaper than we can buy it. Our clients value our independence and our personal care*

for their pets. If we lose this income stream, we would have to increase consultation and other fees by a huge amount to compensate, which would push clients back to larger corporate groups who can be more competitive. All this does is increase the monopoly within the industry.

- *Limited consultation time means that discussion about prescriptions is not possible - this will take up every consult slot. Making owners aware of written prescriptions I think is important and is often offered in practice however it is not always appropriate i.e. for trialling medication, medication that needs to start asap, medication that can only be given out in small amounts as they are controlled. Having this information laid out in a clear way (website) would be easier than receptionists having this conversation constantly in the waiting room with posters up*
- *A centralised database with standard procedure costs does not account for the standard of care provided or practice costs that each individual practice offers. Producing prescriptions in every consult is extremely time consuming and not at all practical. I would not be able to get through my consulting list in a timely manner, and I am an experienced vet. Clients would certainly become more upset about the back log and long waiting times this would cause. This would only cause additional stress and dissatisfaction for all (vet staff and clients alike!).*

Recommendations

- Mandatory prescriptions as proposed are not supported by independent vets due to concerns about increased costs, logistics, animal welfare, practicality and proportionality of the Remedy proposed.
- Overall client savings by are viewed as illusory as the practices would need to compensate for lost income. We accept it will remove cross subsidy between clients. Many cross subsidies exist within the profession for good reason (subsidised neutering, wildlife, child's pets etc)
- There is support for an e- portal to simplify prescription delivery and this should be pursued as a medium-term solution. This is likely to be expensive and difficult to deliver. There is a clear need to find a way that the prescription process can be simplified given the plethora of practice management systems.
- We support making clients aware of prescriptions and how best they can be utilised to lower their cost of treatment in given circumstances. The vet and client are best able to do this with the support of further information provided to the client. P

- Trialling out new improved methods to create awareness of prescription availability, improved awareness and audit of RCVS Practice Standards codes and other recommendations highlighted in the BVA response

8.6 Comparison Website - Alternative options

Instead of building a complex Comparison price list there are other options Which of the following would you support to improve clients understanding of PRICES, CHOICE AND EXPECTATIONS?

Answer Choices	Yes	No	Maybe	Response Total
Standardised price list ,which is contextualised with your service offering, available on OWN PRACTICE website	53.61% 141	9.89% 26	36.50% 96	263
Clients are supported by Independent Client website, linked to your website, that explains how to choose/ use / work with their vet	43.51% 114	13.36% 35	43.13% 113	262
Clients provided Transparency and choice by further improving estimate procedures	62.74% 165	7.98% 21	29.28% 77	263
Clients knowledge is improved to better match expectations and reality in terms of treatments and costs.	77.10% 202	4.58% 12	18.32% 48	262
Client provided with more information on Client Information website on treatment options for common procedures	49.81% 132	15.85% 42	34.34% 91	265
Answered: 262 Skipped: 0				

A minority of respondents(4-15%) were averse to any of the proposals suggested. 53% of respondents would prefer a standardised price list on their own practice website which provides a contextualised offering rather than a price comparison website which they believe will ultimately distort the market.

The support for a client information site receives a mixed reception. However when explained in more detail at Meeting 2 (May 19th) SPVS CMA meeting there was broad support. There is nervousness that any website can be skewed to disadvantage independent and individual practices. However, 77% of respondents would value finding a way to improve clients' knowledge to better match the expectations and reality of treatments and costs. This could form part of a client information site. Approximately half the respondents would value more information on treatment options to be provided by a client information site. Any centralised site would save time in the consultation and could (with sufficient resource) be kept up to date with most recent recommendations (c.f. NHS Website)

Comments from respondents

- *An attached website is better than just giving prescriptions as there is also some responsibility on owners to see what is better option for themselves. If I am going to buy a car or any other product, I do some product research after. So, I think vets should have improved transparency but it's impossible to go into too much detail, do clinical exams, perform basic in consult procedures, discuss medications and then offer all purchasing options. Every party needs to take some responsibility and ownership*
- *I am concerned the CMAs investigation is moving the conversation away from value. Our bitch spays are the same price as the local practice, but we know our standards e.g. IVFT and multiparameter etc are significantly higher. How do we communicate value? Not all clients' values are the same and some are happy with cutting corners therefore the focus purely on price is not necessarily a good approach in what is a complicated relationship between vet and client.*
- *The client is paying their vet to guide them through treatment options and pros/cons. Trying to reduce this to website sound bites will undermine the relationship and lay the ground for disappointment when their case is not "standard"*
- *Allow practices to show the value of what client is getting for the cost not just generating figures which will be used as loss leaders or incomplete picture of treatment costs/add-ons*
- *The problem with making any price list anywhere is that e.g. a routine haem/biochem/electrolyte blood test or a set of X-rays may be very expensive at one practice but their routine neuterings or dentals may be very cheap. So, it may involve people switching around between practices all the time. Also, it would then need updating every time there is a price change which is a lot of admin!!*
- *I think client education about illnesses, costs and care really important, google is very helpful for this especially with AI, google reviews for practices informs clients in the best way on care provided by veterinary practices. Insurance companies should be included in educating clients, they must have a lot of information, yet they are allowed to sell policies that are not going to cover very common problems for example cruciate disease*

8.7 Client information Site

Developing an Independent Client Information Website, that could be linked your practice website, could provide a standardised way of informing clients on how best to work with their vet, find a vet, ask about fees, navigate the consult. Which of the following do you believe would help?

Answer Choices	Responses	
How to search for local vet	 38.55%	101
What to look for when choosing a vet	 54.20%	142
How to prepare and navigate a consultation	 27.48%	72
Moderate expectations through Case studies that display the complexities of urgent cases	 37.40%	98
Breaking down barriers- asking for price updates etc	 31.68%	83
Medicines- prescriptions/ best use/ pros and cons	 35.50%	93
Contextualised care explained	 44.66%	117
All of the above	 37.40%	98
none of the above- do not support development	 13.36%	35
56 Comment: 		
Answered: 262 Skipped: 0		Response Total: 262

The development of a client information site has a mixed reception. At the CMA meeting 2, more time was devoted to the explanation of how a client information site could work, its aims and potential structure. The area that is of greatest concern is the inclusion of elements that compare practices (price/ quality assessments that can be skewed). When given the reassurance that the client information site was designed to inform and guide the clients so that they could navigate the veterinary contact better, the delegates were positive. There are relevant comments here about access, who should run the site and its design, the importance of client responsibility in pet ownership etc.

Comments from respondents

- *I feel that the vets should be responsible for informing the client of the costs throughout the process multiple times when treating an animal, however, I think there must be emphasis that these costs can unpredictably change, as animals health can change and that whilst we can provide an initial idea of the cost of treatment, we are within our rights to change this along the line of treatment with respect to how the animal reacts to treatment and the clients need to be made aware of this. I feel a lot of clients would not understand this concept and would merely see the cost of 'diabetes management' as X price when in reality this is not something a practice can really provide, then it opens the clients up to more*

dissatisfaction and complaints when costs exceed this as clients do not understand the science behind certain conditions.

- *None of that (sic client information site) would change the extra time that we'd need to spend with clients during the consult. Most clients won't read it and even those who do will want it explained and put into context by the vet in the room.*
- *I would like this to be run by the RCVS to ensure fair and accurate information.*
- *I think a vast majority of the clients won't follow any information provided by that website. We already ask people to come prepared/ or for example tell them 15 mins consults are for routine health checks/vaccines only and people still come with sick animals (which requires a 30 mins slot at minimum and costs exactly the same as 15 mins). Also, what about elderly clients who are not tech savvy?*
- *A client information site would be helpful in finding a practice suited for them. I do not necessarily think adding costs of individual key procedures, consults etc would be helpful. This will likely benefit the corporate businesses who having different pricing structures. I also think this would be time consuming and more complex as different business structure pricing differently. Pricing changes frequently, this would be a lot of administration. Having an information site informing clients on number of full-time vets, RVNs, advanced practitioners, specialists, facilities etc would be more helpful and more useful for the client.*
- *I think this (sic client information website) provides the best solution and also means some responsibility remains with the pet owner. They are the ones responsible for their pet's welfare and have a duty to make sure they keep themselves informed. Pet ownership is a choice (a luxury in fact, not a necessity) and comes with costs and responsibilities, just like owning a car. Yes, there are emotions attached but that does not mean that services to these pets and customers should not be fairly charged and vets and business owners fairly compensated. I struggle to find another profession who are told how much they can charge or mandated to direct their clients to lower/ lowest cost providers. I see how this is appropriate for essential services such as electricity, gas, water but not for services to a luxury item you have chosen to buy.*
- *It would depend on who was writing this and whether they had an independent or corporate bias*
- *Having this available would be positive but relies on clients proactively searching the information out.*
- *I think a client information website is a far better idea than a price comparison site. Having previously worked as a locum vet in multiple practices I have seen firsthand that there is a marked difference in the quality of care provided between veterinary practices and prices often reflect this. For instance, a bitch spay at my current practice includes top level analgesia (methadone), continuous monitoring via an RVN and the use of a multiparameter*

machine (including BP assessment) and the patient is on intravenous fluids pre op, during op and post op. They also receive 2 post op checks included in this cost. You cannot directly compare this to a neighbouring practice who may well be cheaper but has a non-qualified member of staff monitoring the patient, the patient has basic, poor analgesia (butorphanol), isn't on fluids and doesn't have a post op check. I therefore do not see that you can directly compare the costs of procedures between practices as there are so many variables involved that may reflect the quality of care the patient receives. This is where the client information website would be more useful in my opinion, allowing clients to have a better understanding of how procedures may be performed in different practices.

Recommendations

- Further consumer studies need to be undertaken to establish whether there is consumer demand for a client information site
- Logically the Find a Vet should be linked to a Client Information Site landing page. Finding a new vet is not the start point for the client journey when they are thinking of buying a pet.
- Further work is required to establish content and how best to display this. The view from SPVS and FIVP is that this should be explored more fully as this approach could be more rapidly achieved than a complex Comparison site and would be of benefit to both practices and clients if designed properly.

8.8 Improving the awareness of prescriptions

Instead of mandating prescriptions there are other options. Please RANK the following methods would you support to IMPROVE AWARENESS OF PRESCRIPTIONS with 1 being the most important and 5 the least important. Each concern must have a different rank – no duplicates. Note: As each item is ranked, the list will automatically update to reflect your selections.		
Item	Total Score ¹	Overall Rank
Displaying pre formatted standardised posters explaining that clients can purchase medicines from practice/ other practices/ online?	1035	1
Every receipt to be headed/footed by a sentence informing clients that they can ask for a written script at every consult	837	2
Leaflet available to give to clients re prescription choice	726	3
Verbal discussion re prescriptions with tick box on PMS yes/ no for audit purposes	706	4
Clients directed to Independent Client Information website that explains how to get the best from their vet (inc prescription advice/ logistics)	626	5

The majority of respondents identified that using pre-formatted standardised posters or information on receipts within the practice would be the most in effective and practical way of informing clients of the availability of prescriptions.

The Client Information Site as a standalone solution was lowest ranked option as it requires an active response from the client. Direction to a centralised information site however would allow for more context and guidance for consumers as to the process and expectations of how online pharmacies work as an example.

Discussions at meetings revealed that vets believed that part of the reason some clients were not aware of prescriptions as route to market was that they had not experienced a problem with their pet that required a prescription.

Comments from Respondents

- *Verbal discussion is great, but we are dealing with humans who are frequently under time constraints. Automated processes e.g. notifications on receipts or even on the prescription label if space allows means the clients are always informed without the need to rely on vets who frequently forget to mention everything we ask them to!*
- *Make it clear that a written prescription is available and online prices may differ. But ultimately clients do also need to do some work here too! Signs on website/ in waiting room etc are fine.*
- *Written prescriptions are available at our practice. Mandatory prescriptions would undermine the Vet Client Pet Relationship because time would need to be spent discussing them in every consult. Most of our clients want their pet's welfare addressed first and foremost. Price is obviously important but not to the detriment of their beloved pet's health. I have built up good VCPRs over the last 20 years and would not want to harm those*

relationships by having to discuss written prescriptions in every consult. We provide estimates, discuss options and offer written prescriptions. The written prescriptions at present time are for long term medications, such as pain relief for osteoarthritis, once a suitable medication is found for that particular pet.

- *Clients should be informed before they purchase ideally, but posters often aren't read. Verbal will achieve this but adds time/ discussion. Many practices use text reminders for appointments, this could include a message along with a link that could then EXPLAIN why medications may be cheaper online in more detail than a header/footer, a small poster or a rushed chat*
- *information needs to explain: - prescription may not be appropriate for short term medication - medication may be more expensive if have prescription and buy-online - Prescriptions may be more cost effective for chronic conditions*
- *It hasn't even come up yet that the biggest problem with all of this is that animals will be delayed in getting their treatment! If they have to wait 48 hours for a set or antibiotics or pain relief because they get them online, then it's the animal that suffers. I can understand it for ongoing medication e.g. old dog on Metacam but for immediate problems, it should just be routine that we give out meds*

Recommendations

- Simple solutions may work more effectively than high tech offerings which will be complex, costly to build and with long lead times.
- There is a raft of practical and animal welfare issues issuing prescribing for short or immediate courses of treatment that must be considered carefully.
- There is confidence that with a concerted effort that awareness of prescriptions can be simply achieved which would be more proportionate and less harmful to the practices and clients.
- A simple trial could be established to confirm which methodology works most effectively and could be initiated promptly without the need to have a medicine cap deployed as an interim measure.

9 Summary

9.1 Remedy emphasis

There is a general concern amongst the independent practices that the **price focus** within the remedies will **undermine their independent businesses**. There is a real risk that a **market distortion** can occur with larger practices and groups being able to compete more effectively on price alone (especially for medicines).

Any comparison between practices mandated should be fair and include all the parameters that influence the client decisions. This would allow the client to make an informed choice based on the **value a practice** offers which is highly client specific.

9.2 Behaviour changes vs Mandating change

Several of the remedies involve **mandatory** solutions. There is particular concern that this can trigger unintended consequences within a diverse marketplace. As part of the consultation process with our members it has become increasingly clear that aiming to achieve simple **comparisons between practices** in a generic way is complex to achieve without unintended consequences.

We support the statement below in the Review summary regarding consumer understanding and knowledge.

*“20. If a package containing some or all of these remedies were put into place, we expect that it would **empower consumers with greater understanding of the treatment and other options open to them and the different vet practices that could provide these services. This would allow pet owners more easily to choose the right option for their preferences, budget and pet’s circumstances.** Such choices might be exercised: when a pet owner is selecting an FOP for example on acquiring a new pet; when considering alternative treatment options offered by a FOP and when deciding whether to take their business elsewhere – either for individual medications or treatments or switching FOP altogether. We would expect that this would give rise to increased engagement from consumers which would exert pressure on vet firms to better tailor their offerings to consumer preferences and bear down on prices, or else risk losing business to market rivals.”*

Social science of behaviour change is a complex area. What is known is that mandating change is a blunt instrument to achieve lasting change. If behaviours are not altered at the core, it can trigger evasive behaviours rather than embedded change. Our members are not averse to change. However, this must be done well to minimise harms. We would urge you to study the responses from our members who provide a clear and logical steer as to which remedies would work and how best they could be improved.

Independent practice owners are highly autonomous and react adversely to rules being imposed especially if this impinges on the efficiency of the practice without a clearly defined benefit.

Standardisation of complaints processes is welcome; however, it must be proportionate to both the level of complaints and scale of the business.

Start-up practices are the future competitors in the marketplace and require detailed consideration as to how they can be sympathetically managed given the relatively low levels of turnover and staffing in early years.

How best to achieve change? Mandating change gives a higher risk of imposing a rigid system across all practices irrespective of need. Should all remedies be applied equally irrespective of size or risk of harm?

The veterinary marketplace is highly variable, and the impacts of any mandated change will be significantly different between practices.

Smaller independent practices operate using simple methods of management often achieve high level of client satisfaction due to delivering consistent, compassionate, competent levels of service. They deliver a fantastic client experience through effective client bonding, building trust and aligning treatments with their clients' needs. Contextualised care is already being delivered. Their businesses thrive based on high client satisfaction and simple management structures often reliant on the owners to provide the leadership and management for the practice.

Any approach which mandates additional layers of process and regulation will not further the client experience, it will simply add cost and reduce owner morale.

10 Conclusions

In conclusion, SPVS and FIVP share the CMA's commitment to a competitive and consumer-friendly veterinary market. However, the proposed remedies, in their current form, pose significant risks to the sustainability and diversity of independent veterinary practices.

The overriding concerns are:

- **Increased Compliance Costs and Logistical Burdens:** The remedies threaten to lengthen consultation times and increase administrative overhead, disproportionately affecting smaller, less technologically advanced practices.
- **Market Distortion:** There is a real danger of creating an uneven playing field, where larger groups can leverage economies of scale to compete solely on price, potentially driving independent practices out of business.
- **Erosion of the Vet-Client Relationship:** Overemphasis on price transparency risks undermining the trust and personalized care that are the hallmarks of independent veterinary practice.
- **Diminished Mental Wellbeing:** The added pressures and complexities could accelerate owner exits from the profession, further exacerbating existing staff shortages.

On a positive note, we believe that achievable aims lie in potential revisions. We strongly recommend that the CMA consider the following:

- **Replace Mandatory Prescriptions with a Trial or Revised Remedy:** Explore more practical, cost-effective solutions based on personalized consultations and client needs.
- **Enhance Client Communication:** Improve how information on Transparency and Choice is delivered to clients in a cost-effective and practical way, focusing on education rather than mandates.

- **Leverage Existing Resources:** Utilize the Client Information Site and Find-a-Vet tools to support information flow to clients.
- **Focus on Value:** Shift the emphasis from price alone to the overall value proposition offered by each practice, recognizing the importance of quality, service, and expertise.
- **Implement Proportionate Approaches:** Tailor remedies to the size and capabilities of individual practices, avoiding a "one size fits all" approach.
- **Embrace a Phased Implementation:** Introduce changes gradually, with regular reviews of client feedback and outcomes.

In line with the Strategic Steer to the CMA from HM Government, we urge you to ensure that any remedies imposed are “growth-enhancing” and “proportionate”. Collaboration with businesses is essential to resolving these complex issues.

We trust that the CMA will carefully consider the detailed feedback provided by SPVS and FIVP, representing a wide group of independent business owners, and work towards solutions that support a thriving, sustainable, and client-centered veterinary sector.

We would welcome an opportunity to provide any further support to the CMA in any further revisions to the proposed Remedies

Appendix A

The 2024 Survey of the Veterinary Profession report

<https://www.rcvs.org.uk/news-and-views/publications/the-2024-survey-of-the-veterinary-profession-report/>

Table 9.4: Challenges facing the profession (multiple response)

	2024 N	2024 %	2019%
Client expectations/demands	3,197	54.3	54.9
Stress levels	2,912	49.4	47.3
Affordability of veterinary services	2,728	46.3	30.0
Staff shortages	2,471	41.9	-
Changing structures in veterinary practice ownership	2,366	40.2	30.3
Difficulty in recruiting veterinary surgeons	2,307	39.2	25.7
Poor financial reward	1,711	29.0	25.8
Misinformation/bad PR	1,222	20.7	17.6
Staff turnover	1,189	20.2	-
Poor support for the profession	1,179	20.0	11.0
Economic climate	1,065	18.1	12.7
Training of newly qualified veterinary surgeons	955	16.2	
Brexit	904	15.3	13.6
Expectations of employees	852	14.5	-
Animal welfare issues	524	8.9	-
Decline in farming	501	8.5	11.8
Underutilisation of skills	385	6.5	-
Lack of diversity within the profession	341	5.8	-
Discrimination	125	2.1	-
Technology	122	2.1	-
Changes in training	107	1.8	1.6
Other	275	4.7	-

Source: RCVS Survey of the Veterinary Profession, 2024 and 2019

Comments

Client expectations, stress, staff shortages, affordability of veterinary services and changing structures in ownership identified as key challenges.

Table 9.5: Improvements that could be made to the veterinary profession (multiple response)

	2024 N	2024 %	2019 %
Better financial reward	2,746	47.0	53.9
Less workload pressure	2,499	42.8	30.1
Managing client expectations	2,330	39.9	-
More respect/recognition from the public	2,304	39.4	24.6
Less regulation/bureaucracy	2,100	35.9	21.3
Better management/leadership	1,945	33.3	-
More flexible working	1,605	27.5	18.2
Better opportunities for career progression	1,595	27.3	19.7
Shorter hours	1,495	25.6	13.8
Less out-of-hours/on-call	1,099	18.8	20.7
More professional support	926	15.8	-
A more open culture	903	15.5	-
More support staff	820	14.0	11.2
Greater variety of business model opportunities	712	12.2	-
Improved CPD processes	593	10.1	-
More personal support	574	9.8	-
More variety	128	2.2	2.2
More responsibility	80	1.4	1.5
Other	339	5.8	3.2

Source: RCVS Survey of the Veterinary Profession, 2024, 2019

Comments

Better financial reward, less workload pressure, managing client expectations, more respect from the public and less regulation and bureaucracy are the top 5 areas identified as potential areas for improvement.

Potential areas which risk poorer outcomes for clients and leading to proposed remedies.

Appendix B. Consultation meetings with SPVS and FIVP members

CMA SPVS Meeting to discuss CMA Remedies 13/5/2025

May 13th – 30+members

Introduction

We hosted this meeting for the benefit of our members to share insights on the challenges posed by the proposed CMA remedies for the veterinary profession. Our goal is to collaboratively identify areas for improvement while maintaining a positive and constructive outlook. We accept that Transparency and Choice are good things, and we have worked hard in these areas. The reason why we have not gone further is largely due to the complexity and difficulty in achieving these elements in every circumstance. The veterinary sector is almost unique. Private commercial businesses delivering a highly fluid level of animal care 24/7 dealing with urgent cases in a wide range of species. Human private healthcare does not deal with the same level of human care, and they can speak to their patients! Other professions are not “time bound” to the same extent and successful remedies in other much larger, more supported professions providing a completely different service may not be able to work within our setting.

Executive Summary

The key concerns we have with the Remedies proposed are:

- If implemented this would make the UK Veterinary profession one of the **most highly regulated businesses/ veterinary professions** in the world. We will have moved from a highly regarded, self-regulated profession to one where there are substantive mandatory controls in multiple areas
- The adoption of this level of regulation will, if not sensitivity managed, directly impact on the **Vet Client Patient Relationship (VCPR)** and **erode trust and cause confusion for the clients**. They are familiar with the current system but just want this to be better.
- **The impacts will be wide ranging** leading to an increase in fees for veterinary care as it is anticipated that (depending on how prescriptions are mandated) that lost medicine margin will be redistributed to fees. This has **direct animal welfare impacts** as some clients may find urgent veterinary care more expensive.
- The **Comparison Website** approach has risks of further **distorting the fee structure** as practices will be compelled to remain competitive with any publicised fees and this will generate a “race to the bottom” directly **impacting on the ability for practices to invest in quality care for their clients**.
- **The impact of any regulatory change is an increase in administrative and management input**. Again, if not managed carefully this will **disproportionately affect smaller, independent practices that may lack the resources and IT skills to navigate the numerous remedies**.
- **The time critical “point of care” will be impacted by anything that requires further explanation**. There is a drive for formalising contextualised care,

increased recording of treatment options and potentially significant time devoted to medicine supply explanations.

- Currently the **IT provision through multiple PMS providers lacks a commonality of approach to prescriptions**. If this is combined with the issues of misuse of prescriptions makes vets nervous about more widespread adoption. **The e- prescription portal makes sense** but will require either collaboration between all 20 PMS providers or a software solution out with this to be built. Funding for such a complex system is not clear.
- **If all the remedies are deployed simultaneously this will immediately drive up the time for each consultation** and the whole investigation will risk, simply **adding cost to the veterinary practices** at time when they risk losing income to online pharmacies.
- There has been no detailed impact assessment on both these elements provided which makes any decisions challenging.
- **The very short consultation time for the profession (15 working days) may result in a distorted level of input** into the remedies with independent practices least likely to have time to contribute to improving the remedies

Despite concerns around potential income loss, increased administrative burdens, impracticality of certain proposals, and market distortion—particularly affecting smaller practice. We aim to explore solutions that support a sustainable and resilient veterinary sector.

CMA Report and Veterinary Profession

The attendees (largely independent practitioners) reviewed the upcoming CMA report, focusing on proposed remedies such as:

- Mandatory prescriptions
- Medicine price caps
- Comparison websites

The aim is to highlight key remedies, evaluate risks, and identify unintended consequences.

The goal is to propose more effective solutions where possible.

Emphasised the importance of not just problem-spotting but also presenting constructive proposals.

The Remedies relating to Regulation were not discussed in detail due to time constraints but their further impact on management resources and recording was noted.

Vet Profession Proposals and Alternatives

The group examined a comprehensive document outlining potential changes to the veterinary sector. Each of the Remedies 1-14 were discussed with the aim of exploring consequences and impacts

Concerns were raised about specific proposals, particularly:

- Mandatory prescriptions
- Price capping on medicines
- Lack of profitability considerations

The SPVS CMA team agreed to discuss alternative options to the CMA's proposal, especially around prescriptions and pricing to ensure veterinary practices remain sustainable.

Mandatory Prescriptions for Veterinary Services

Challenges:

Implementation complexity and administrative burden, especially for smaller or isolated practices.

Increased workload may impact profitability and the ability to focus on clinical work.

The confusion caused by issuing prescriptions to clients when they are not needed or utilised by the client.

The risk of clients misusing the prescription system remains a concern.

Potential impact on the veterinary-client relationship and practice reputation.

Concerns about the burden shifting to online pharmacies, which could undermine traditional practices.

Short-term medications requiring written prescriptions could complicate consultations.

Proposed Solutions:

Developing a streamlined e-portal for prescriptions to reduce administrative workload.

Providing written prescriptions for long-term medications, allowing clients to obtain medicines from online sources if desired.

Considering a compromise system where certain prescriptions are easier to manage.

Focusing efforts on clients requiring long term medications would deliver the optimal cost benefit.

Exploring ways to balance regulatory requirements with practical considerations, possibly through phased implementation or trial runs. This would help identify impacts and allow for practices to adjust fees in a measured way.

Practicality of Prescription Requirements

Challenges

Administrative overload, especially for smaller practices with minimal centralised resources.

Marginal practices, in remote or rural areas, may need to close if income streams and complexity are introduced.

Additional consultation time needed to issue prescriptions.

Risk of clients exploiting the system.

Potential interference with clinical judgment and quality of care.

Proposed Solutions:

Creation of an electronic portal to facilitate prescriptions.

Educating clients about obtaining prescriptions in their own time rather than within a busy veterinary practice.

Offering options like long-term prescriptions to reduce frequency of visits and streamline care.

The wider use of an information or Client Portal, additional notices within practices, staff training would help increase the awareness of prescriptions as a route to medicine supply.

Addressing Veterinary Practice Price List Concerns

Challenges:

The proposed six-month prescription duration might be negligent, especially for certain cases. The need for veterinary judgement is important re prescription length.

Complexity and ambiguity of new price list categories could lead to confusion and misinterpretation.

The current proposals for displaying Price Lists may not accurately reflect the true cost of the overall level of veterinary services.

Simply not easy to provide comparative prices for differing levels of service creating apples vs pears comparison.

Entire pricing, if not transparent, could diminish trust and client understanding. Simple solutions are best to avoid unintended consequences.

Proposed Solutions:

Including broad case examples (rather than just prices alone) to provide clients with realistic expectations of the difficulties and costs of this process. This could help share the client experience and understanding. These could be hosted on a Client Portal.

Enhancing clarity of price categories with clear definition to allow apple vs apples comparison

Empowering clients with educational resources on choosing vets and preparing for consultations, getting the best from their vet, navigating prescriptions etc.

Providing average or typical case scenarios to better illustrate costs.

Client Portal or Information Site

Challenges:

Difficulty in implementing and gaining adoption for a new Price Comparison portal if solely based on price. Clients seldom choose their vet on price. Other factors are more important to them (outcomes, client service, convenience)

Ensuring the portal offers valuable, accurate information without being overwhelming.
Potential resistance or concern around replacing traditional comparison websites.

Proposed Solutions:

Developing a comprehensive Client Portal to provide information on services, insurance, cremations, etc.
Enhancing the Find-A-Vet RCVS portal to provide more meaningful comparators
Incorporating guidance on insurance and value-based decision-making.
Using existing CMA resources to streamline implementation. A very simple version already exists created by the CMA. This could be significantly improved with the aim of really explaining to clients how they can optimally use their vet and make the right choices.

Veterinary Practice Estimates, Treatment Options and Client Signoffs

Challenges:

Practical difficulties in providing detailed estimates and explanation of treatment options, especially in complex cases.
Client understanding and buy-in may be inconsistent.
Time constraints for veterinarians, particularly in busy practices.

Proposed Solutions:

Introducing more detailed pre-treatment estimates and clinical information.
Piloting new procedures by inviting CMA representatives to shadow veterinarians to identify real-world challenges.
Considering trial implementations of these proposals for evaluation.
Emphasising clear communication to clients and obtaining informed signoffs in a simple way utilising existing PMS software.

CMA's Proposed Remedies and Impact on Practices

Challenges:

Limitations on bundling services could reduce revenue streams.
Price controls on prescriptions and cremations may reduce income, especially for smaller practices.
The potential increase in administrative demands.
Market distortion risks, where smaller practices could face disproportionate challenges adapting to the multiple remedies.
Animal welfare and further consolidation of practices. Smaller less profitable clinics close.
The meeting closed at 9pm and everyone was thanked for their input.

Summary SPVS FIVP Meeting with Members

May 19th- 35 attendees

Overall Concerns and Challenges:

- **CMA's Approach:** Many attendees felt the CMA's proposed remedies didn't reflect the realities of veterinary practice, and didn't adequately consider the information shared with them. There's a sentiment that the CMA has a pre-set agenda and is prioritising publicity over practical solutions.
- **Profitability:** A significant concern is the lack of consideration for practice profitability in the CMA's analysis. The proposed remedies, particularly mandatory prescriptions and price capping are feared to negatively impact revenue and potentially make smaller practices unviable.
- **Practicality & Workload:** Implementing many of the proposed remedies (mandatory prescriptions, detailed price lists) would significantly increase administrative burden and workload for vets and staff, taking time away from clinical care. Many systems won't interoperate with the current technologies.
- **Impact on Client Relationships:** There's worry that focusing heavily on price transparency will damage the vet-client relationship, turning it into a purely transactional interaction and undermining the value of veterinary expertise. The mandatory QR codes on subscriptions will give a sales advantage to large corporations over local businesses.
- **Fairness and Market Distortion:** Concerns were raised that some remedies (like favouring online pharmacies) could unfairly benefit large corporations and disadvantage independent practices.
- **Lack of Evidence:** Several speakers pointed out the lack of solid evidence for the CMA's claims of veterinary practices charging exorbitant prices and the disproportionate amount of time all people involved has to spend responding to this.

Specific Remedies and Associated Challenges:

Mandatory Prescriptions:

- **Challenges:** Increased workload (generating prescriptions for every medication), potential for client confusion and dissatisfaction, the administrative burden of documenting declined prescriptions, and potential disruption of the consulting style.
- **Potential Solutions:** No mandating of prescriptions for all cases. Focus prescriptions on long term medicines. Self-certification that a prescription was offered and declined with annual audit.

Price Lists and Comparison Websites:

- **Challenges:** Difficult to create accurate and comparable price lists due to the complexity of veterinary services and the variations in treatment. Risk of "race to the bottom" on prices, potentially sacrificing quality of care. The sheer number of procedures that may be required on these lists, with only a few used, makes it a largely wasted exercise.

- **Potential Solutions:** Client portal with enhanced Finder Vet information. Explain the value of vet services, provide information and guidance to aid client appreciation/ understanding.

Restrictions on Out-of-Hours Providers:

- **Challenges:** They already exist for good reasons to secure contracts and confidence of business case.
- **Potential Solutions:** Don't restrict these as they would be very detrimental to the quality of veterinary care and OOH provision.

Proposed Actions and Solutions:

- **Collective Response:** Continue working together through the working group (BSAVA, BVA, SPVS, VMG, BVNA) to create a collective response to the CMA's proposals.
- **Individual Submissions:** Encourage individual practices to submit their own responses to the CMA, emphasising the impact of the remedies on their specific practices. The CMA values hearing from people on the front line.
- **Highlighting Practical Concerns:** Focus on demonstrating the practical challenges and unintended consequences of the proposed remedies.
- **Focusing on Positive Solutions:** Propose alternative solutions that address the CMA's concerns while minimising disruption to veterinary practices and client relationships.
- **Empowering Clients:** Emphasize the importance of empowering clients with information to make informed decisions about their pet's care, rather than solely focusing on price.

In essence, the meeting highlights a strong sense of unease and opposition to the CMA's current proposals, with a call for more practical, evidence-based solutions that consider the realities of veterinary practice and the importance of the vet-client relationship.

Appendix C :SPVS Survey CMA Remedies May 2025

341 Responses in Total- All practices

1. Your details

1. What is your job title?				
Answer Choices			Response Percent	Response Total
1	Veterinary surgeon		42.82%	146
2	Director, Owner or Partner		39.59%	135
3	Practice Manager		4.69%	16
4	Nurse Manager		1.47%	5
5	RVN		4.11%	14
6	Clinical manager/ Director		3.52%	12
7	Reception/ Client Care Manager		0.88%	3
8	Other (please specify):		2.93%	10
			answered	341
			skipped	1

2. Where do you currently work (mainly)?				
Answer Choices			Response Percent	Response Total
1	Independent Practice		75.95%	259
2	Independent Large Group Practice >10 practices		0.88%	3
3	Corporate owned Practice		14.66%	50
4	Joint Venture Clinical Practice		4.40%	15
5	University		0.88%	3
6	Retired from Clinical Practice		0.00%	0
7	Private Consultancy		0.88%	3
8	Wider Veterinary Industry		0.29%	1
9	Other (please specify):		2.05%	7

2. Where do you currently work (mainly)?

	answered	341
	skipped	1

3. How long as your business been trading?

Answer Choices			Response Percent	Response Total
1	Not open yet		0.59%	2
2	0-2 years		4.69%	16
3	3-5 years		9.68%	33
4	6-20 year		28.15%	96
5	Over 20 years		56.89%	194
			answered	341
			skipped	1

4. How many FTE vets are there in your practice?

Answer Choices			Response Percent	Response Total
1	1		5.28%	18
2	2-3		24.93%	85
3	4-7		29.03%	99
4	8-12		17.30%	59
5	13-20		11.44%	39
6	20+		12.02%	41
			answered	341
			skipped	1

5. What best describes your practice?				
Answer Choices			Response Percent	Response Total
1	100% First Opinion Small Animal		77.71%	265
2	SA Referral Practice		2.05%	7
3	>80% Small animal		1.17%	4
4	Mixed practice		10.56%	36
5	Equine practice		1.47%	5
6	Large Animal practice		0.29%	1
7	Other (please specify):		6.74%	23
			answered	341
			skipped	1

2. Your opinions of the CMA Remedies

6. What statement best represents your level of knowledge and understanding of the CMA Remedies?				
Answer Choices			Response Percent	Response Total
1	Totally conversant- Read the Remedies Document		17.89%	61
2	Aware of the major Remedies proposed		49.56%	169
3	Only partly aware of the Remedies		21.70%	74
4	Have limited knowledge about the proposed Remedies		9.68%	33
5	No idea about the proposed Remedies		1.17%	4
			answered	341
			skipped	1

7. Please rank the following five CMA concerns about the proposed remedies in order of importance to you, with 1 being the most important and 5 the least important. Each concern must have a different rank — no duplicates. Note: As each item is ranked, the list will automatically update to reflect your selections.

Item	Total Score ¹	Overall Rank
Extra Compliance burden/ costs- extra reporting, pricing updates, IT etc	1285	1
Damage to Vet Client Pet Relationship- erosion of Trust	1257	2
Lost time during consultation explaining choices to clients	1085	3
Overall reduction in practice profits	792	4
Lost revenue to pharmacies	711	5
¹ Score is a weighted calculation. Items ranked first are valued higher than the following ranks, the score is a sum of all weighted rank counts.	answered	342
	skipped	0

8. Do you agree or disagree with the following statements relating to the Veterinary Market Place? The proposed Remedies will....

Answer Choices	Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Response Total
disproportionately affect the smaller, independent practices with less management support?	70.18% 240	19.30% 66	6.73% 23	2.92% 10	0.88% 3	342
may create advantages for Group practices to expand?	35.86% 123	30.03% 103	24.78% 85	8.16% 28	1.17% 4	343
create additional barriers to entry for start ups?	42.82% 146	39.00% 133	13.49% 46	3.23% 11	1.47% 5	341
accelerate the sale of practices due to increased pressure	39.13% 135	37.97% 131	17.39% 60	4.06% 14	1.45% 5	345
improve retention and motivation of veterinary professionals in practice?	1.74% 6	1.74% 6	7.25% 25	28.99% 100	60.29% 208	345
					answered	341
					skipped	1

9. The current CMA proposal is to provide clients with improved transparency and choice via MANDATORY prescriptions allowing the client to choose where to buy medicines from (own practice, other practice or pharmacy) Do you agree or disagree with the following statements.

Answer Choices	Strongly agree	Agree	Neutral	Disagree	Strongly Disagree	Response Total
Providing a QR code and lowest medicine price on their receipt is a proportionate measure to inform clients	3.52% 12	12.61% 43	17.89% 61	26.98% 92	39.00% 133	341
An e-portal that would allow prescriptions to be sent direct to pharmacy would simplify prescribing	14.96% 51	42.82% 146	15.54% 53	14.96% 51	11.73% 40	341
Mandatory prescriptions will provide choice and lower the OVERALL cost of care for clients	2.05% 7	11.44% 39	13.20% 45	31.09% 106	42.23% 144	341
Mandatory prescriptions are the most proportionate way to make clients aware of lower cost medicine providers	0.88% 3	7.04% 24	12.32% 42	39.30% 134	40.47% 138	341
Mandatory prescriptions will be popular with all clients	1.47% 5	4.99% 17	14.37% 49	51.91% 177	27.27% 93	341
Mandatory prescriptions will simply add cost to my business and reduce practice income	58.94% 201	29.62% 101	8.50% 29	2.05% 7	0.88% 3	341
					answered	341
					skipped	1

3. Potential Solutions

10. Developing an Independent Client Information Website, that could be linked your practice website, could provide a standardised way of informing clients on how best to work with their vet, find a vet, ask about fees, navigate the consult. Which of the following do you believe would help?

Answer Choices	Response Percent	Response Total
1 How to search for local vet 	38.71%	132
2 What to look for when choosing a vet 	53.37%	182
3 How to prepare and navigate a consultation 	30.21%	103
4 Moderate expectations through Case studies that display the complexities of urgent cases 	38.71%	132
5 Breaking down barriers- asking for price updates etc 	34.31%	117

10. Developing an Independent Client Information Website, that could be linked your practice website, could provide a standardised way of informing clients on how best to work with their vet, find a vet, ask about fees, navigate the consult. Which of the following do you believe would help?

6	Medicines- prescriptions/ best use/ pros and cons		36.36%	124
7	Contextualised care explained		46.63%	159
8	All of the above		39.00%	133
9	none of the above- do not support development		11.73%	40
			answered	341
			skipped	1
Comment: (68)				

11. Instead of building a complex Comparison price list there are other options Which of the following would you support to improve clients understanding of PRICES, CHOICE AND EXPECTATIONS?

Answer Choices	Yes	No	Maybe	Response Total
Standardised price list ,which is contextualised with your service offering, available on OWN PRACTICE website	57.02% 195	9.36% 32	33.63% 115	342
Clients are supported by Independent Client website, linked to your website, that explains how to choose/ use / work with their vet	45.16% 154	13.78% 47	41.06% 140	341
Clients provided Transparency and choice by further improving estimate procedures	63.45% 217	7.89% 27	28.65% 98	342
Clients knowledge is improved to better match expectations and reality in terms of treatments and costs.	80.12% 274	4.39% 15	15.50% 53	342
Client provided with more information on Client Information website on treatment options for common procedures	51.74% 178	14.24% 49	34.01% 117	344
			answered	341
			skipped	1

12. Instead of mandating prescriptions there are other options. Please RANK the following methods would you support to IMPROVE AWARENESS OF PRESCRIPTIONS with 1 being the most important and 5 the least important. Each concern must have a different rank — no duplicates. Note: As each item is ranked, the list will automatically update to reflect your selections.

Item	Total Score ¹	Overall Rank
Displaying pre formatted standardised posters explaining that clients can purchase medicines from practice/ other practices/ online?	1369	1
Every receipt to be headed/footed by a sentence informing clients that they can ask for a written script at every consult	1094	2
Leaflet available to give to clients re prescription choice	944	3
Verbal discussion re prescriptions with tick box on PMS yes/ no for audit purposes	935	4
Clients directed to Independent Client Information website that explains how to get the best from their vet (inc prescription advice/ logisitics)	788	5
¹ Score is a weighted calculation. Items ranked first are valued higher than the following ranks, the score is a sum of all weighted rank counts.	answered	342
	skipped	0
Comment: (56)		