

Battersea Dogs & Cats Home,
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Competition and Markets Authority
The Cabot
25 Cabot Square
London
E14 4QZ
United Kingdom

To whom it may concern,

Re: Consultation on Veterinary services for household pets in the UK Remedies

As a leading UK animal welfare organisation, Battersea welcomes the opportunity to respond to the Competition & Markets Authority's consultation on their proposed remedies to the current investigation on Veterinary services markets.

Given the questions posed in the consultation and the fact that Battersea does not offer commercial veterinary service, we have elected to respond to this consultation in the form of this letter to best provide the necessary relevant information, whilst not taking a view on the wider practices of commercial veterinary services. Most of the questions raised are, we consider, outwith our remit as a rescue and rehoming organisation managing our own veterinary clinic.

Impact of veterinary costs

While we offer no view on the causes of the situation of the reported increase in veterinary cost, and cannot comment on the detail how inflationary pressures have affected the operation of individual elements within the commercial veterinary sector; the increased cost pressures felt by owners are undoubtedly having an impact on rescue and rehoming centres. This is directly seen by Battersea through our own animal intake. In 2024 9% of our non-stray intake was attributed to financial reasons which includes, but is not exclusive to the cost of vet care. It currently accounts for 8% of gifted intake in 2025 as of April. Similarly, Battersea's market monitor survey in Autumn 2024 of 1,700 UK adults, showed that 27% of pet owners agreed that they would not be able to afford unforeseen vet surgery should their pet need it. As a consequence, it seems reasonable to expect that people will avoid the threat of these bills by avoiding going to the vet in the first place. At the same time, many owners are cutting back on pet insurance, which can otherwise act as a shield from unexpected bills. In either case, animals are being left ill for longer because owners are nervous about cost.

Since the end of the COVID-19 lockdowns and the start of the cost-of-living crisis Battersea has seen an increase in animals coming into our care with more severe medical needs where owners have delayed veterinary care.

Battersea is in favour of measures to both improve transparency and affordability, that enable pets to remain with their owners and ensure that their welfare is safeguarded in line with legal obligations under the Animal Welfare Act 2006. However, as stated previously, we are not in a position to advise or comment on specific proposed remedies. However, we would advise that affordability is not the only criteria and that positive welfare outcomes should also be considered alongside this.

Transparency on pricing and controls including prescriptions

Owners are ultimately responsible for the welfare of their pet. Enabling them to make informed decisions about their pets' medical care better enables them to meet their legal obligations under the Animal Welfare Act. Therefore, Battersea welcomes measures to increase transparency of pricing, different treatments and referral options that will enable owners to make the best welfare decisions for their pets.

Battersea is supportive of measures (including remedy 7) which would look to increase awareness amongst pet owners of their right to request a prescription; and the potential benefits including cost savings of purchasing medicine from a third-party retailer, however this should be safeguarded by ensuring owners are aware what a reputable third-party retailer looks like, especially online.

Battersea in principle supports remedy 10 and similar initiatives to enable choice and affordability. We believe there should be a price control on the level of prescription fees that can be charged by a first opinion practice (FOP), rather than leaving the setting of prescription fees to the market, as is currently the case. Currently, there is no transparency behind charges. However as with all proposed remedies there should be the ability to review this to ensure it is effective. This would help to ensure that, pet owners are not charged a prescription fee which is higher than the reasonable costs of providing the prescription and help to safeguard animal health and welfare.

For rescues, as well as owners, capping prescription costs can be beneficial to ensure animals welfare does not suffer due to artificially inflated costs. This can be particularly damaging for animals that have long term health conditions, and so the charges must be paid regularly. Clarity would be welcome on how these potential price caps would be calculated; if costs are prohibitive this could affect the potential rehoming market for some animals as it may act as a disincentive for certain potential owners when considering a rescue dog with a condition needing ongoing treatment.

Battersea would suggest caution in how any potential price cap of prescriptions is implemented to ensure there are no loopholes to still enable higher fees being passed

onto other areas for example the fee for consultation, the fee for surgery or the markup charged to the medicines themselves.

Review of the regulatory framework

Whilst Battersea cannot comment of the need to review the regulatory framework and the performance of the Veterinary Surgeons Act from a commercial perspective, we are aware of a need for review from a welfare perspective. As the CMA highlighted in the consultation paper there are no protections for animals or owners under the relevant legislation for organisations. This has become evident through the rise of canine fertility clinics following the increase in demand for puppies during the COVID-19 pandemic. Thanks to investigations by the Naturewatch Foundation, it has been reported that evidence of unqualified persons carrying out blood tests and transcervical/surgical insemination. This puts animal welfare at risk but takes place due to lack of an up-to-date regulatory framework.

If helpful Battersea would be glad to elaborate on these points further.

Yours sincerely,

Peter Laurie

Cheif Executive

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