

APPCC Response to CMA Remedies Working Paper – Non-Confidential Version

FAO CMA Investigation Team,

I am contacting you on behalf of the Association of Private Pet Cemeteries and Crematoria (APPCC) in response to your recent Remedies Working Paper concerning veterinary-sold cremation services.

We strongly support Remedies 13 and 14 (p.116–118), advocating enhanced transparency and the implementation of retail price controls, particularly around individual cremation services. Our experience consistently shows pet owners often remain unaware of their rights and available alternatives. Veterinary practices frequently fail to disclose third-party crematoria involvement clearly, restricting informed consumer choice and contributing to unfair pricing practices.

For example, I recently spoke to a distressed family whose pet was put to sleep at a referral practice. They were told the practice could either return the pet to them or arrange cremation. No written information, pricing, or details of the cremation provider were provided at the time. After deciding to change their mind a few hours later, they found their pet had already been transferred to a cremation service. Retrieving their pet required a long journey and payment of unexpected fees. This demonstrates how consumer protection legislation is being undermined by non-transparent practices. We can provide further details to the CMA in confidence if required.

This situation is being repeated daily across the UK. Vulnerable and grief-stricken pet owners are being sold cremation services without the necessary information or time to make an informed decision.

With the continued low-cost prices offered by veterinary buying groups (encouraging vets to make large profits from selling cremations to their clients) and low rates between corporate veterinary groups comes the concern that if transparency is not enforced in how services are being provided and priced, pet owners will continue to pay overinflated prices for low-quality ashes-back services.

We specifically urge the CMA to:

- Mandate explicit, written disclosure of all cremation options, costs, and the names of third-party providers involved including any financial incentives.
- Prohibit non-transparent bundling of cremation services with euthanasia or consultations.
- Ensure cremation pricing is clearly separated from veterinary euthanasia or consultation fees.
- Consider involving regulatory bodies like the RCVS in monitoring compliance with pricing and transparency guidelines.

We remain available to provide further evidence or contribute to ongoing discussions aimed at developing practical, enforceable solutions.

Sincerely,

Kevin Spurgeon
APPCC Director
On behalf of APPCC Membership