

Veterinary services for household pets market investigation

Notice of provisional findings made under rule 11.3 of the Competition and Markets Authority Rules of Procedure (CMA17)

1. On 23 May 2024, the Competition and Markets Authority (**CMA**) in exercise of its powers under sections 131 and 133 of the Enterprise Act 2002 (the **EA02**), made a market investigation reference in relation to the supply of veterinary services for household pets in the United Kingdom (**UK**).¹
2. By a notice dated 10 June 2025 and acting under section 137(2A) of the Act, the CMA inquiry group appointed to consider this reference (the **Inquiry Group**) extended the period within which the CMA is due to prepare and publish its report on the reference by six months to 22 May 2026.

Provisional findings

3. The Inquiry Group has provisionally found, pursuant to section 134(1) of the Act, that there are features of the relevant markets which individually or in combination, prevent, restrict or distort competition in the supply of veterinary services for household pets in the UK and accordingly that there is an adverse effect on competition (**AEC**) within the meaning of section 134(2) of the Act.
4. The Inquiry Group has provisionally found an AEC in the markets for (i) the retail supply of veterinary services for household pets by first opinion practices (**FOPs**) in the UK, and (ii) for the supply of outsourced out-of-hours (**OOH**) provision to FOPs in the UK, respectively.

AEC in the market for the retail supply of veterinary services by FOPs

5. The Inquiry Group has provisionally found that the following features of the market for the retail supply of veterinary services for household pets by FOPs in the UK, individually or in combination, prevent, restrict or distort competition in connection with the supply of those services:

¹ Veterinary services for household pets in the UK, [Terms of reference](#).

- (a) Certain features that are inherent to some degree in the market:²
- (i) the complexity of many veterinary services;
 - (ii) pet owners make decisions on behalf of their pets and want to do the best for them;
 - (iii) pet owners inevitably have less expertise than their vets, cannot directly assess the diagnostic and treatment options that may be available and the clinical quality of the services they receive (which is hard to measure and communicate to them) and rely on their vets, in a relationship of trust, to help them make decisions;
 - (iv) pet owners' decisions about vet services are sometimes made in urgent or emotional situations;
 - (v) there is sometimes uncertainty in vet care, both about what treatments pets need and the clinical outcomes;
 - (vi) highly sophisticated (and often costly) treatments are available for pets; and
 - (vii) vets necessarily play a gateway role – their expertise and advice is needed for diagnoses, treatments and referrals, and the prescription of many medicines, and that gives them a dual role of both advising on those services and products and giving access to and selling them.
- (b) Other features that are not inherent to the market (those that can be changed or modified), but which exist in the market at the moment:
- (i) some pet owners are aware of price differences, and some of those who are aware take price into account when choosing FOPs and buying medicines, but many are not aware, do not compare prices or take price into account when making those decisions;
 - (ii) there is a lack of easily accessible, timely and clearly comparable information for pet owners about the products and services provided by vet practices, including their prices and levels of quality, about the veterinary businesses themselves (such as ownership links), and about alternative suppliers of these services; and

² These are features that, notwithstanding their potential to have an adverse effect on competition, we would expect to find, to some degree, even in a well-functioning market (owing to the nature of the relevant services and the way pet owners interact with vets).

(iii) the regulatory framework is inadequate – it does not sufficiently help address the features above that can be changed or modified, nor does it sufficiently reduce the potential for harm from the inherent features – in that it:

1. does not, in addition³ to objectives concerning animal welfare and the public interest, place enough focus on the interests of pet owners as purchasers of veterinary services and on promoting competition to serve those interests;⁴
 2. is too narrow in scope – binding only individual vets and nurses, but not veterinary businesses;
 3. gives pet owners only limited and inadequate help in gauging the relative quality of services;
 4. contains poorly designed mechanisms for monitoring and enforcing compliance with regulatory requirements;
 5. contains limited provision for effective complaint handling and consumer redress; and
 6. does not adequately separate the regulator’s professional leadership functions and those relating to standard-setting and disciplinary matters.
6. These features mean that competition does not operate as effectively as it would were pet owners able to make better informed and supported decisions about the products and services they buy, and from whom, and to which practices have to respond (for example, by lowering prices or increasing quality, or offering a range of services, prices and quality that meet pet owners’ needs).

AEC in the market for outsourced OOH provision to FOPs

7. The Inquiry Group has provisionally found that the following features of the market for the supply of outsourced OOH provision to FOPs in the UK, individually or in combination, prevent, restrict or distort competition in connection with the supply of those services:

³ And complementary to.

⁴ For example, it does not ensure that vets and veterinary businesses routinely provide pet owners with appropriate and timely information about treatment options and prices.

- (a) Certain features that are inherent to some degree in the market:
 - (i) The demand for OOH services is lower, the costs of providing them are higher, and the market is more concentrated than for FOP services;
 - (ii) Contractual notice periods and termination fees will likely, to some extent, be necessary to protect the commercial viability of outsourced OOH services;
 - (iii) Even if information on providers of OOH services were available, many pet owners would be unlikely to shop around when choosing an OOH provider, particularly given the urgency with which OOH services are typically required. FOP vets are required by regulation to provide 24-hour care so that OOH services are likely to be viewed by pet owners as part of a FOP's overall offering. These two features, in turn, are likely to weaken the competitive pressure on OOH providers selling those services to FOPs; and
 - (b) A feature that is not inherent to the market, but which exists in the market at the moment, namely that some contracts for the supply of the services contain terms providing for longer notice periods, and higher early termination charges, than are necessary to provide the contractual certainty required to make the supply of the services viable.
8. These features result in barriers to OOH suppliers entering the market and to FOPs switching supplier (or self-supplying) where they do not receive a good level of service or prices are too high. They reduce the competitive pressure that existing suppliers are under to maintain or improve the quality of their services and lower prices in order to win and retain business.

Provisional decision on remedies

9. The Inquiry Group has provisionally decided on the following remedies. Its provisional judgement is that these measures would remedy, mitigate or prevent the AECs concerned, and remedy, mitigate or prevent any detrimental effects on customers so far as they have resulted from, or may be expected to result from, the AECs.

Measures to increase consumer engagement and choice of most suitable FOP

1. A requirement for veterinary businesses that operate more than one FOP⁵ or a combination of FOPs and other veterinary or online pharmacy services⁶ under common ownership or control⁷ to clearly and prominently disclose that common ownership or control on websites, in premises and in communications within three months of any CMA Order being made.

2a. A requirement for veterinary businesses operating FOPs or referral centres to publish on websites and in premises clear, accessible information about their services, to support informed decision making: information regarding their out-of-hours care, qualifications held by practice staff and any RCVS accreditations or awards. Veterinary businesses with 15 FOPs or more (**larger veterinary businesses**) would be required to do so within three months of any CMA Order being made and veterinary businesses with fewer than 15 FOPs (**smaller veterinary businesses**) within six months.

2b. A requirement for veterinary businesses operating FOPs or referral centres, and crematoria, to publish online and in premises clear, standardised price lists for a defined set of services they offer. Prices would need to be easily accessible, up to date, and presented in a consistent, transparent and understandable format. Larger veterinary businesses would be required to do so within three months of any CMA Order being made and smaller veterinary businesses within six months.

2c. A requirement for veterinary businesses operating FOPs to publish prices for parasiticide (ie flea, tick and worming) medicine products on websites and in premises, along with a link to a list of approved online pharmacies. Larger veterinary businesses would be required to do so within three months of any CMA Order being made and smaller veterinary businesses within six months.

2d. A requirement for veterinary businesses operating FOPs offering pet care plans to publish online and in premises clear, comprehensive information about those plans. This includes listing all included services, the relevant frequency of provision and standalone price of each, and details about parasiticides. They must explain how any claimed savings are calculated. Larger veterinary businesses would be required to do so within three months

⁵ As defined for the purposes of each proposed remedy in the provisional decision report.

⁶ FOP, out of hours, referral centre, animal hospital, diagnostic laboratory, pet cremation and online pharmacy services.

⁷ Eg in a group, joint venture or partnership.

of any CMA Order being made and smaller veterinary businesses within six months.

3. A requirement for veterinary businesses operating FOPs or referral centres to submit key practice information to the Royal College of Veterinary Surgeons (**RCVS**), for it to publish on its Find a Vet platform and for it to share the data with approved third parties. This includes information such as ownership, services offered, type of animals treated, pricing and pet care plan details. The RCVS would be subject to a requirement (either under an Undertaking it gives to the CMA or a CMA Order) to collect the information and make it publicly available on the Find a Vet platform, enhance the platform's functionality and share data with approved third parties. The RCVS would be required to do those things within nine months of the CMA accepting such an Undertaking or making an Order. Veterinary businesses operating FOPs or referral centres would be required to provide the information to the RCVS within three months of the RCVS putting systems in place to collate and display it.

4. A requirement for the RCVS (under an Undertaking it gives to the CMA or a CMA Order) to commission and publish the results of a national survey of pet owners which compares each large veterinary group (**LVG**) and independent veterinary businesses (as a group), once every two years, and a requirement for the LVGs to publish the group-level comparisons on the website and in the premises of each of their FOPs, and publish the link to the RCVS webpage where the results are published, such that they are readily accessible and comparable by pet owners. The fieldwork for the first survey would be required to start within six months, and the first results published within ten months, of any Undertaking being given or any CMA Order being made.

Measures to help consumers choose the most suitable treatments, referrals and diagnostics and to support vets to provide independent and impartial advice.

5a. Requirements for veterinary businesses operating one or more FOPs to provide pet owners with a written estimate of the total cost of any treatment option which they recommend when it is reasonably foreseeable that it would be £500 or more (including VAT) and to give them an update if the expected estimated cost increases by 20% or £500 (whichever is lower), which would take effect within three months of any CMA Order being made, and a recommendation for the RCVS to reflect these requirements in its Codes and Guidance.

5b. A requirement for veterinary businesses operating FOPs to provide pet owners with itemised bills for their pet's treatments and other services they

receive, that would take effect within three months of any CMA Order being made, and a recommendation for the RCVS to reflect this requirement in its Codes and Guidance.

6. A requirement for all veterinary businesses operating FOPs to have in place, within three months of any CMA Order being made, written policies and processes, including appropriate training, to ensure that their vets and vet nurses are able to act in accordance with the principles and provisions contained in the RCVS Codes and Guidance relating to providing pet owners with (a) independent and impartial advice; and (b) appropriate and timely information regarding a range of treatment and referral options and their costs.

Measures to open the medicines market to greater competition and help pet owners get the best prices

7. A requirement for veterinary businesses operating FOPs (a) to make pet owners aware they can get a written prescription and buy medicines online more cheaply, including through the provision of standardised literature at specified times and on emails and text messages and invoices / receipts, as well as notices in waiting rooms, and (b) to ensure that vets working in those FOPs inform pet owners of their ability to request a written prescription during each consultation in which medicine is prescribed. Larger veterinary businesses would be required to do so within three months of any CMA Order being made and smaller veterinary businesses within six months. A requirement for the RCVS (under an Undertaking it gives to the CMA or a CMA Order) to produce and distribute standardised notices and information about the written prescription process and for it to host that information on its website, which the RCVS would need to comply with within three months of it giving an Undertaking or of a CMA Order being made.

8. A requirement for all veterinary businesses operating FOPs to give pet owners written prescriptions by the end of a consultation (in hard copy) or the end of the day (a digital copy). Larger veterinary businesses would be required to do so within three months of any CMA Order being made and smaller veterinary businesses within six months.

9. A requirement for all veterinary businesses operating FOPs which sell own brand medicines to (a) specify clearly on the labelling, packaging and on invoices the active ingredients contained in the own brand medication and a statement that branded equivalents are available; (b) provide pet owners with the name of the branded equivalent, which must be provided alongside the medication when it is dispensed; and (c) ensure that vets prescribing own brand medication inform pet owners that there are branded equivalents

available, which can be purchased from third parties. They would be required to do so within three months of any CMA Order being made.

10. A requirement for all veterinary businesses operating FOPs to give pet owners a chance to choose whether their default preference for repeat prescriptions is a written prescription or medication dispensed in-clinic. They would need to contact pet owners at specified times to ask for their default preference and inform them that it is often significantly more expensive to buy repeat medication from a FOP. Pet owners who do not make a choice would have their default preference set to receiving written prescriptions. Larger veterinary businesses would need to comply with the requirements within three months of any CMA Order being made and smaller veterinary businesses within six months.

11. Requirements that veterinary businesses operating FOPs charge no more than £16 for providing a written prescription and put in place policies and procedures on the duration of prescriptions and to ensure that only a single prescription fee is charged per consultation. Larger veterinary businesses would need to comply with the requirements within three months of any CMA Order being made and smaller veterinary businesses within six months.

Measures to facilitate FOPs switching Out of Hours provider

12. A prohibition on businesses including in any new contract for the provision of outsourced OOH services, or the enforcement in respect of any existing contract, of any term which (a) requires a veterinary business operating a FOP to give more than 12 months' notice to terminate that contract or (b) requires the business operating a FOP which has given due notice to make any payment for terminating the contract unless it stops using the services before the notice period expires. Businesses providing outsourced OOH services under a contract which includes terms rendered unenforceable by a CMA Order would be required to write to the relevant veterinary business operating FOPs within 3 months from the date of a CMA Order. In doing so, the former would need to inform the latter of the period of notice that may be given to terminate that contract (which may be no more than 12 months) and that no termination payment would be due where such notice is given and the notice period is served.

Measure to facilitate best pet end of life choices for pet owners

13. Requirements for all veterinary businesses operating a FOP to offer communal cremations, to make pet owners aware of all the options available to them when their pet reaches the end of its life, to publish individual and communal cremation prices and to allow pet owners a period of two working

days to make a decision,⁸ and provide a one working day period during which a pet owner can change their mind about the cremation service they have chosen.⁹ Larger veterinary businesses would need to comply with the requirements within three months of any CMA Order being made and smaller veterinary businesses within six months.¹⁰

Measures to improve a pet owner's ability to complain and receive redress if they are unhappy with their pet's care

14. A requirement for all veterinary businesses operating FOPs (a) to establish, publish and provide to pet owners an in-house complaint process which meets specified minimum criteria for each of its FOPs, and (b) to keep a complaints log for each FOP, sharing it with the sectoral regulator as required and reviewing it periodically. The businesses would be required to comply with the requirements within six months of any CMA Order being made (save in respect of sharing a complaints log with the regulator, with which requirement veterinary businesses would have to comply within 18 months).

15. A requirement for all veterinary businesses operating FOPs to engage in mediation in good faith where a pet owner's complaint is not resolved in-house and the pet owner wishes to take the complaint to mediation. The requirement would take effect within six months of any CMA Order being made.

16a. A requirement for the RCVS (under an Undertaking it gives to the CMA or a CMA Order) to develop and publicise a decision tree document to help pet owners navigate the different routes to obtaining redress for complaints. The RCVS would be required to develop and publish the decision tree before the end of the six-month period described in relation to remedy 14 above.

16b. A requirement for the RCVS (under an Undertaking it gives to the CMA or a CMA Order) to collect, analyse and publish on an annual basis data and insights on complaints in the veterinary market for household pets. The first report would be required to be published within 24 months of any Undertaking being given or any CMA Order being made.

⁸ If the pet owner does not want to make a decision immediately after discussing the relevant options with their vet.

⁹ If the pet owner has made a decision immediately at the end of their pet's life and does not want to take the deceased pet and make their own arrangements.

¹⁰ For the requirement to offer communal cremations aspect of the remedy, there would be six months for any FOPs who need to negotiate a contract for communal cremations with a crematorium.

Measures to provide a replacement statutory regime for the effective regulation of veterinary services

17. A recommendation to the UK government, in consultation with the Scottish Government, Welsh Government and Northern Ireland Executive, to establish a replacement statutory regime for the regulation of veterinary services for household pets, including: regulating veterinary businesses and the practices they own; regulating the professional conduct of vets and vet nurses; robust and effective monitoring and enforcement; an effective complaints and redress system; statutory duties to promote competition and further the interests of pet-owners; and an independent and effective veterinary regulator.
10. In addition to the remedies set out above, the Inquiry Group also proposes to recommend that the RCVS promptly reviews its Codes and Guidance in relation to some of the remedies.

Provisional decision report

11. The Inquiry Group's reasons for its provisional findings and proposed remedies are set out in full in its provisional decision report and are summarised in the summary of that report (see note below).

Next steps

12. The Inquiry Group now invites interested parties to submit reasons in writing as to why these provisional findings should not become final (or should be varied). Comments should be made via the CMA's [consultation portal](#)¹¹ or by email to VetsMI@cma.gov.uk.
13. Unless otherwise specified to a party, these reasons should be received by the Inquiry Group **on Friday 14 November 2025**.
14. Unless a different date is agreed with any party, the Inquiry Group will have regard to any such reasons provided by this date in making its final decisions in this investigation.

Martin Coleman

Group Chair

15 October 2025

¹¹ <https://connect.cma.gov.uk/vets-provisional-decision>

Note: A copy of this notice and the provisional decision report will be published on the CMA's website on 15 October 2025 or shortly thereafter. The published version of the provisional decision report will not contain any information which the Inquiry Group considers should be excluded from the report, having regard to the three considerations set out in section 244 of the Act.