

**To: Martin Coleman, CMA**

**Re: CMA letter to veterinary members of CVS buying groups (MiPet Club and VetShare)**

**Date: 21<sup>st</sup> Jan 2026**

Dear Martin,

I am responding to the request for feedback on the use of own-brand products in veterinary practice. For context I am a veterinary surgeon and company director of an independent small-animal vet practice in England, UK.

I understand the use of own-brand products can appear to prevent transparency for clients who may wish to purchase the equivalent medications online. I hope my feedback below will give you an indication for the business reasons why we choose to purchase own-brand products via MiPet (part of buying group MiVetClub), and the factors which affect our decisions as an independent small business. I have also reviewed the remedies proposed by the CMA and outlined the practicalities and pitfalls of each of these.

#### **Business reasons – re: own-brands v branded products**

As an independent practice and a veterinary business, we are bound by retail and VMD regulations as to where we can purchase veterinary medicines for resale.

We are not permitted to buy medicines for resale from an online pharmacy that serves the public (nor do we benefit from their discounts, which they presumably acquire direct from the pharmaceutical manufacturers). We purchase through a veterinary wholesaler, which ultimately dictates the price we pay; this has a knock-on effect as to what our clients pay for their medications.

For example, prices for a commonly prescribed NSAID (anti-inflammatory) medication are compared below (prices correct as of 19/01/26). The generic drug name is meloxicam; brand names include Metacam (available online) and Meloxid (own-brand by Mipet) among many others. For clarity, the 2 biggest UK online pharmacies are shown. Both of these pharmacies are owned by corporates – Animed is owned by CVS, and Pet Drugs Online (PDOL) is owned by IVC.

Brand	Meloxid Dog 100ml	Metacam Dog 100ml	Metacam Dog 100ml	Metacam Dog 100ml
Supplier	Mipet	Wholesaler	<b><i>PDOL (IVC)</i></b>	<b><i>Animed (CVS)</i></b>
Cost	<u>List price to vet</u> £7.48 + VAT £8.98 incl VAT	<u>List price to vet</u> £35.47 + VAT £42.56 incl VAT	<b><i>Retail £ to public</i></b> <b><i>£13.94 + VAT</i></b> <b><i>£16.73 incl VAT</i></b>	<b><i>Retail £ to public</i></b> <b><i>£14.13 + VAT</i></b> <b><i>£16.95 incl VAT</i></b>

As you can see, even with a 12.5% wholesale discount, we cannot compete with 'Metacam' online prices. The online pharmacies can sell it to the public for less than half of the price we pay to buy it from our wholesalers. Even with a marginal mark up to cover costs (storage, (temperature control, wastage, pharmacovigilance, prescription / admin costs, and the need for a small profit), we still just cannot compete.

If a client chooses to source prescription-only (POM-V) medicine online, they will need to pay for a written veterinary prescription (a document showing we have authorised this medication, at our advised dose, and are taking responsibility for the animal's care while on this treatment). At our practice this incurs an administrative cost of £29, for up to 3 drugs, for up to 6 months. As above, the markup on our own drug sales covers this cost among others, so no additional separate prescription charge is applied on drug sales in-house.

Even with the professional fee for a written veterinary prescription factored into our sales, no vet can reasonable supply branded 'Metacam' at a competitive price, so clients looking for this end up buying from the (mainly corporate owned) online pharmacies.

As such we choose as a business to be a member of a buying group. Although the buying group (MiVetClub) is itself owned by a corporate (CVS), it allows us to retain our independence and to work alongside other independent practices as a co-operative, allowing us to buy MiPet own-brand products at a more competitive price.

In the new age of online pharmacies, the marketplace for the buying of wholesale drugs means that if independent vet practices do not commit to a buying group with own-brand products (or if they are ultimately prevented from doing so by the CMA), then these independent businesses will be prevented from competing fairly, and will thus suffer losses as a consequence, because customers will simply turn to the corporate-owned online pharmacies. The only solution for an independent would be to significantly increase their professional fees by the same margin of loss, meaning overall no benefit to the customer.

As an example, let's take our own vet practice that has 20% drug sales and 80% professional fee sales (for context these are fairly standard figures for our industry). If the ability to purchase own-brand products is removed, and clients move online for their drug purchases, then we could lose up to 20% of our turnover. As a small independent, we cannot afford this, as such our professional fees would need to increase by the same margin. So, although drug prices appear fairer, the overall cost to the customer will remain the same, or else our business would no longer be able to function.

The CMA needs to really dig deep into the bigger picture of veterinary wholesale supplies, and the disproportionate advantage the corporates have in the marketplace. They own the buying group in many cases, they also own the online pharmacy in most cases, so it's a win-win situation for them and a lose-lose situation for both the independent vets and the customer, who will need to pay increased veterinary fees to account for the loss of drugs turnover.

In summary, if independent vet practices are blocked from purchasing own-brand or discounted branded supplies via a buying group, they will struggle to compete / may not survive. If they struggle to compete, this will funnel more profit into the corporate online pharmacies. If they cannot survive, this will aid growth of corporate-owned vet practices on the high street. Either way, the customer does not benefit, the model will reinforce corporate infrastructure and push independent practices further into the ground – the very antithesis of competition.

### **Comments – re: CMA remedies**

- a. specifying clearly on the labelling, packaging and on the invoice the active ingredients contained within the own-brand medication and a statement that branded equivalents are available:
  - The datasheet given out with each prescribed product already contains the generic name / active ingredients of the prescribed drug.
  - We can add notes to the invoice stating that branded equivalents are available, but many clients do not request or want a formal invoice when paying at reception, so this solution will not be effective in reaching all clients.
  - Adding additional lines to an already packed drugs label / in-house packaging will create additional administration time and costs, as additional labels will need to be generated to account for the additional information. These costs will need to be factored into professional fees and dispensing costs.
  - The manufacturer of the own-brand product should take responsibility for this on all pre-printed packaging, rather than the vets on the ground. This should include all blister packs / envelopes / additional support materials etc, not just outer boxes, which are often split up into smaller dispensed blisters / partial packets during prescription.
  
- b. providing the pet owner with the name of the branded equivalent, which must be provided alongside the medication when it is dispensed:
  - Some medicines have multiple different branded equivalents, many of which may not even be known to the consulting vet (e.g. meloxicam has at least 8 different brands).
  - Researching and advising on every possible branded version of a drug prescribed will cause unnecessary time pressure on an already busy consulting veterinary surgeon (15-minute time slot to greet, discuss, examine, diagnose, treat, advise, and record medical notes). Additional costs will also be incurred for adding more labels to products. These additional costs and time wasted will need to be factored into the cost of the medication, or professional fees, to the client.
  - Conversely, providing only some of these without an exhaustive list would constitute a lack of impartiality in purchasing advice.
  - Perhaps it should be up to the customer to go and research the generic drug name and look for branded alternatives.
  
- c. ensuring that vets prescribing own-brand medication inform pet owners orally that there are other branded equivalents available, which can be purchased from third parties.
  - This is practical, however in the 15 minutes of time given (as above – to greet, discuss, examine, diagnose, treat, advise, and record medical notes) it is possible that this part may be understandably forgotten by the vet, which leads to inconsistency in advice for the clients.