

We received 9 submissions which used the template published by British Veterinary Union.

## **Response to the CMA paper published October 15<sup>th</sup> 2025**

**From:** [your name]

I am a [job role]/ pet owner (delete as appropriate).

Whilst I support some of the remedies that the CMA is proposing for the UK veterinary sector, I believe there is more than can and must be done to ensure fair competition in the market and accessible services for pet owners.

Although I am pleased to see the CMA call for an updated Veterinary Surgeons Act, I would like to see clearer recommendations from the CMA to central government about the kind of regulatory reform that must be present in any new legislation for the sector. This must include protection of the veterinary nurse title. It must also include mandatory practice regulation, and that regulation must include inspections and not just self reporting; this system must ensure that practices and businesses are held accountable, rather than individual professionals without control over practice policies and operation.

I support the BVU's call to base such a system of practice regulation on fundamental "care frameworks", adapted for veterinary medicine from the CQC's human focused equivalent.

These would include:

- **Contextualised care** - the provision of care based on the context of the pet and owner, with appropriate levels of choice in terms of treatment options.
- **Consent** – ensuring that informed consent is obtained for all treatment from pet owners by Veterinary care providers.
- **Provision of safe care** - ensuring no unnecessary harm is caused.
- **Safety of premises** - for patients, pet owners and workers.
- **Standard of equipment** - that it is appropriate, clean, and safe to use for patients, pet owners and staff.
- **Safe and Appropriate staffing levels** - ensuring appropriate staff to patient ratios, and staffing with suitably qualified, competent and experienced staff.
- **Safeguarding from abuse** for patients and pet owners.
- An **appropriate complaints procedure**.
- **Duty of candour** - the practice must be open and transparent with pet owners about their pets care and treatment.
- **Effective governance systems**.
- **Penalties** to practice ratings for failing to meet legal obligations with regards to employment legislation, equalities legislation and health and safety legislation.
- **Display of ratings**.

These must be assessed in terms of outcomes, rather than a tick box exercise of whether policies are in place or not. A policy only affects the pets and pet owners assessing the services of a veterinary practice if the policy achieves its stated outcome.

The system of regulation used by the CQC and CIS is already understood by the public, and designed to be easy to understand. An adaption of the existing PSS method of regulation risks being of no use to pet owners, because it is complex and poorly understood even within the sector, let alone outside it.

I support that the cost of implementing and regulating the remedies within the sector should fall to veterinary businesses and not be subsidised by the individual membership fees that vets and veterinary nurses pay to the RCVS. I support this levy being based on the size of the practice or business.

I support the publication of key prices online, and the requirement to provide itemised bills, and estimates for treatments expected to exceed £500. I believe many practices are already implementing this.

I support a maximum prescription fee, however I am concerned that the wording of this remedy about providing prescriptions at the time of consultation, or emailed the same day. There must be provisions in place to prevent prescription fraud, and given the current lack of a national veterinary prescription infrastructure, this must include practices being able to send prescriptions directly to a pharmacy of the pet owner's choice.

More must be done alongside these measures to ensure that pet owners are aware of the links between veterinary practices and online veterinary pharmacies, where many are owned by the same large corporations, otherwise we risk funneling business from small independent businesses into large veterinary corporations with well obscured vertical integration structures.

I would also like to see the CMA remedies include provisions to ensure that practices are mandated to provide additional administrative time for workers in light of these remedies. Many veterinary workers are already forced to work unpaid overtime in the sector, in order to fulfil their RCVS obligations which their employer does not make provision for. It is plausible that some of these remedies could see workers undertaking further unpaid overtime to meet CMA obligations – an easy way for veterinary employers to shirk some of the costs of the CMA order.

I am disappointed that the CMA has not included any remedies to tackle reform of the very outdated Cascade system, by which veterinary medicines are prescribed. The current system allows for no differentiation in process for veterinary prescribing to food producing animals vs companion animals; it does not allow veterinary prescribers to consider cost as a factor in choosing the most appropriate medicine for a pet; it does not allow the prescribing of generic medicines where there is a licenced branded version – even if the formulations of both medicines are identical.

The rules governing veterinary medicines and prescriptions are not only complex, but not fit for purpose – individual vets or veterinary nurses can find themselves having to make decisions which **cannot** fulfil both their RCVS obligations, and the laws governing veterinary medicines, and this is an unacceptable situation.

In addition, these rules make it **impossible** for veterinary professionals to provide true contextualised care, because we cannot account for financial constraints in prescribing. The system must be updated, and the CMA has a key opportunity to call for this in its remedy papers.

I support the remedy to improve transparency for pet owners when they are selecting or visiting a first opinion veterinary practice, yet concerned that the wording used **could** suggest this remedy is not being applied to **all** veterinary businesses. Introducing this remedy for only first opinion practices may mean that veterinary corporations continue to mislead the public with regards to their vertical integration endeavours – such as referral centres, laboratories, crematoria, and online pharmacies (as mentioned above). This should be clarified and worded more clearly in the final remedies publication.

The CMA notes that they have “*seen no evidence that LVGs which own related businesses ... have sought to restrict access to such services by rival FOPs*”, however there is no mention of consideration here that LVGs may encourage inappropriate use of their own vertically integrated companies, such as referring to their own hospitals when less costly rivals are available, and how to tackle that.

I would like to see the CMA include improved transparency measures which required all practices to clearly display any business links between themselves and any products (eg, own brand medications and foods), and any services or referrals they offer (eg, crematoria and referral practices).

The CMA investigation has been welcomed across much of the veterinary sector, however I am concerned about the influence that veterinary businesses have had over the investigation, compared to the options for input for veterinary workers. Those who are employed at high levels within the LVGs, or have a personal financial investment in a veterinary business have an incentive to provide biased and even false information to the enquiry. Given the unethical practices that have occurred within some of the sector before now, I unfortunately do not believe this would be deterred simply by the power the CMA holds from a legal standpoint. I am disappointed that the British Veterinary Union in Unite (BVU) was not considered a **main party** to the investigation, given that it is the only dedicated trade union for workers in the sector, and the only organisation that represents workers across all job roles. I believe there are many valuable insights from workers in the sector who have no personal financial bias, and who may be in non professional roles (eg, not vets or veterinary nurses) and therefore not represented by any of the other organisations designated as main parties for the investigation.

I would like the CMA to do more to ensure the narrative to the public is clear – veterinary workers are also being exploited by the current system, and poverty pay is rife in the sector, in particular for workers in reception, veterinary care assistant, and student nursing roles. We have also seen real terms pay cuts even for the better paid members of the veterinary workforce, and the CMA report makes it clear that whilst veterinary businesses (and other veterinary bodies) claim that increased wages are to blame for increased fees, they have not been able to provide sufficient evidence to the CMA for this claim. This kind of information could and should be included in summaries and speeches from Martin Coleman, to ensure the public also hear this. I appreciate the repeated message during these speeches and summaries that the veterinary workers the CMA have encountered throughout the investigation have shown themselves to be caring, compassionate and behave ethically, but there is a wide reaching narrative in the press and media that veterinary workers are “money grabbing” and “ripping people off” – whilst I understand the distress felt by the pet owning public who are increasingly unable to afford care – the CMA could do more to showcase the evidence which is already in the reports, but not the summaries, that individual workers wages are **not** the reason prices in the sector have gone up 63% in the same time frame that inflation has risen 35%.

For example, earlier CMA working papers shared that *“analysis suggests that treatment prices increased by over 60% between 2015 and 2023, compared to general inflation for services of 35%, and an increase in vet salaries of 20-34%”*. This shows that vets salaries have decreased in real terms over this time period, and that the increased fees pet owners are facing are not the result of inflated pay. I am aware of many veterinary workers – particularly in lower paid and non professional roles, who are paid very little, and certainly wages that do not compare to the level of knowledge, skill and experience they bring to the practice they work in.