

Introduction

We are a small, independent, owner-run veterinary practice committed to providing transparent, ethical, and high-quality care for our clients and their pets. We support the Competition and Markets Authority's (CMA) goal of improving transparency and consumer understanding across the veterinary sector. However, while we share these aims, we are concerned that several of the proposed remedies would disproportionately affect small independent practices like ours, while having minimal impact on Large Veterinary Groups (LVGs), the very organisations whose market dominance has prompted this review.

The CMA's own findings show that independent practices frequently charge less than LVGs, and yet the administrative, financial, and procedural burdens proposed would fall most heavily on independents. Many of the remedies risk increasing operational costs for small practices while further consolidating power and profit within the LVG sector.

Below, we provide our point-by-point feedback on the proposed remedies:

Point 1: Awareness of Ownership of Veterinary Businesses

We agree this measure is needed. Clients are often unaware that many practices, and most online pharmacies, are owned by large veterinary groups (LVGs). Improving transparency of ownership will help clients make informed decisions about where they seek care.

Point 2: Transparency of Information

- **2a: Information About Staff and Services**

We already provide detailed information about our staff and the services we offer, both on our website and in practice.

- **2b: Pricing Information**

We already publish prices for consultations, prescriptions, vaccinations, neutering, Animal Health Certificates, and dentistry. We also send information about euthanasia and cremation ahead of relevant appointments so clients can review this in advance. However, we do not support publishing extensive pricing lists for surgeries or diagnostics, as these costs can vary so widely between cases that fixed prices would be meaningless and potentially misleading. We believe our current level of transparency strikes the right balance between clarity and practicality.

- **2c: Displaying Prices for Preventatives**

Displaying prices for all flea and worming products would be completely impractical. There are so many different options and price points that any price list would be a dense, hard to read wall of numbers. Manufacturers also update prices at different times of year, so information would constantly be out of date. Maintaining this would create significant administrative burden for small practices.

- **2d: Membership Plan Pricing**

We already provide clear information about the average cost of flea and worming products when clients sign up to our membership plan, so they understand the savings available.

Point 3: Annual Subscription Fee

A £330 annual fee may seem small in the context of a large corporate group, but for independent practices like ours it is a noticeable cost. We feel the benefit to consumers does

not justify this additional expense when most practices, including ours, already publish prices on their websites. Clients are perfectly able to compare prices themselves without intermediaries.

Point 4: Client Surveys

We are supportive of the proposed client feedback surveys.

Point 5: Written Estimates and Billing

- **5a:** We already provide written estimates for any booked procedure and use a lower threshold than the proposed £500.
- **5b:** We already issue itemised invoices automatically when payment is made, so this proposal would not require any change to our current system.

Point 6: Staff Impartiality

We agree with the principle that clients should receive impartial advice about products and services. This reflects how we already operate, and we have no objection to formalising that commitment if required.

Point 7: Prescription Transparency

We already inform clients that they can request a written prescription if they prefer to source their medications elsewhere. We are happy for this information to be included on invoices, though we would prefer not to display additional signage for aesthetic reasons.

However, we are concerned that this proposal will in practice divert clients towards online pharmacies owned by LVGs, further increasing their market share. This reduces genuine competition and may ultimately lead to higher prices overall, as independent practices are forced to raise fees for professional time to compensate for lost revenue. The result would be counterproductive to the CMA's stated aim of improving affordability and consumer choice.

Point 8: Prescription Issuance

We do not issue hard copies of prescriptions, a stance supported by the VMD due to the potential for fraud. Prescriptions are emailed directly to pharmacies, usually the same day. If more medications are to be supplied via written prescription, there must be a centralised, secure system to prevent fraud, and this should be funded by pharmacies, not practices.

Point 9: Medication Labelling

Adding equivalent product options to dispensing labels is not workable. There is not enough space on the label, and it would be unclear which of the many branded equivalents (for example, those containing meloxicam) we would be required to list. A more practical solution would be for manufacturers to include such information on product packaging or for it to be made available digitally, rather than burdening practices with unworkable labelling requirements.

Point 10: Repeat Prescription Preferences

We are completely opposed to this proposal. Creating and maintaining a system to track repeat prescription preferences would impose significant administrative workload with little or no benefit, especially as clients are already informed of their options under point 7.

Point 11: Prescription Fees

We strongly oppose a single prescription fee covering multiple medications. The loss of

revenue would likely lead to fewer repeat authorisations, resulting in clients needing new prescriptions more often, as well as increase in prices for professional time elsewhere.

Point 13: Euthanasia and Cremation Pricing

We already meet, and in many cases exceed, the transparency standards that the CMA proposes. We provide clear pricing in advance and charge only a very small mark-up on cremation services to cover administrative time. It is worth noting that many cremation providers are linked to or owned by LVGs, so additional emphasis on transparency in this area would help clients understand where their money ultimately goes. While the CMA's focus has been on veterinary practice ownership, there is a wider issue of vertical integration across related services (such as cremation and online pharmacies) which collectively drive further revenue to LVGs at the expense of independent practices and genuine consumer choice.

Point 14: Complaint Processes

We support this proposal. We already have a clear, fair complaint process in place and agree that transparency in this area benefits both clients and practices.

Point 15: Mediation Costs

We have no objection to this in principle, but clarification is needed on who would cover the cost of mediation.

Conclusion

In summary, while we support many of the CMA's objectives, several of the proposed remedies risk creating unintended consequences that will harm independent practices and reduce competition. The CMA's own data shows that independents tend to charge less than LVGs, yet the remedies as drafted will increase administrative and financial pressure on the very businesses already offering better value and more personalised care.

We urge the CMA to consider how the cumulative effect of these measures will further entrench LVG dominance across the veterinary, pharmacy, and cremation sectors. To genuinely improve transparency, affordability, and consumer choice, remedies should focus on curbing excessive vertical integration and ensuring a level playing field, not adding disproportionate regulatory burden to the small, independent practices who continue to prioritise care over profit.