

[REDACTED] Advanced Practitioner in Small Animal Cardiology
[REDACTED] Advanced Practitioner in
Small Animal Diagnostic Imaging
[REDACTED]



[REDACTED]
Clinical Director

[REDACTED]
Veterinary Surgeons
[REDACTED]

14th November 2025

Dear CMA,

Please find below my response to each of the remedies that I feel need more thought, and that I strongly feel need alteration. The remedies that I have not mentioned here I agree are appropriate.

1. Requirement to clearly display common ownership on websites, in premises and in communications

I am pleased to see that online pharmacies have been included in this, as it can be very hidden on their websites, and some of our clients currently using online pharmacies would not be happy that they are accidentally funding a competitor, rather than an independent pharmacy.

2.
 - c. Requirement to publish prices for parasiticide medicine products on websites and in premises, along with a link to a list of approved online pharmacies

The negative consequences of this will outweigh the potential benefits. Owners will find this confusing and difficult to interpret, as there is a wide range of parasiticides available, all of which cover different parasites, and are usually prescribed in combination with each other to provide the right level of coverage. Anti-parasiticides should be prescribed on an individual basis depending on risk-benefit analysis, so it is not clinically appropriate for owners to compare between products and choose which they would like before their clinical assessment and discussion with the vet.

It would be more appropriate to require that the vet provides a price estimate of anti-parasiticides for an individual patient once they have done their clinical assessment and decided on the needs of that patient. It would also be appropriate for them to offer a written prescription during this clinical assessment consultation.

Another consequence of this remedy could be the reduction in anti-parasiticide sales in FOPs and a reduction in pet health plan uptake, reducing an important revenue stream. For smaller businesses that cannot afford to reduce their profitability, they will need to make up this lost revenue from other sources eg consultations, and therefore the cost of services such as consultations will increase. In our local area ([REDACTED]) we regularly check prices of our competitors; the independents and corporate practices are all within a few pounds of each other across vaccinations, consultations, and neutering surgeries. If small businesses must put up their services, they will end up more expensive than local competitors who are better able to absorb a loss in profitability. This will give the larger



corporates a market advantage, and reduce competitiveness. There is a high chance that they could take advantage of the situation and further increase their services to match the small businesses, further increasing their profits, and increasing pet owner costs.

You may ask why smaller independent businesses are not able to cope with a reduction in profit. By their nature, the shareholders have personally invested in the company and usually have large business loan debts associated with these shares.

[REDACTED]

Reduced profits will be unsustainable for current shareholders with existing debt, they will be detrimental to share value and put existing shareholders at risk, and they will significantly affect succession planning as it will become harder and less attractive for vets to buy into practices. In Appendix F Section 1.12 you show that of the respondents who considered practice ownership a factor when choosing a FOP, 68% of these preferred independents. It therefore follows that it is vital to keep independent practices open and competitive. There simply must be a balance, and the profits that independent practices make cannot be assumed to be going straight into our pockets, this is simply not true.

3. Requirement for RCVS to publish price information on its Find a Vet platform

I feel like ultimately this is likely to reduce transparency and be inaccurate as I have no doubt that practices will try to minimize their “core” prices of certain procedures and then have various add-ons available. I would suggest that we have the price lists on the practice’s website and visibly in premises where we can explain what is included in that and why we feel it provides value. If there is a requirement for us to have price lists on our website (which we already have) then perhaps this website needs to be listed on the Find a Vet website so that owners can easily access all the practices price lists but with some context.

In Appendix F Section 1.12 you show that of the factors involved when choosing a FOP, only 6-7% of respondents listed price as a main reason. It feels from your remedies that you have put a large emphasis on price comparisons and helping owners to choose a FOP, yet it doesn’t appear owners will be particularly interested in this.

7. Requirement to make pet owners aware they can get a prescription and buy medicines online more cheaply through standardized notices in waiting rooms and standardized messages in a range of communications and in consultations.

This is listed as “Measures to open the medicines market to greater competition and help consumers get the best prices” but it will reduce competition. The biggest online pharmacies are owned by LVGs. I feel that the wording “...buy medicines online more *cheaply*...” is inappropriate and makes it sound like we are overcharging, whereas in reality, as an independent practice we don’t have an over-inflated markup, we don’t have as good a buying group discount as the LVGs do, and so we charge for medicines fairly. We can’t even buy in from our wholesaler some medicines for the price that online pharmacies are selling it out at. By increasing the LVG sales via their owned pharmacies they will potentially have access to more and more discounts, and we will end up with a few big online pharmacies taking over the medicines market, this is not increasing competition.

I feel that having notices in the waiting room, and informing clients that written prescriptions are available in consultations and at the time of prescription requests is appropriate.

[REDACTED]

8. Requirement to give pet owners written prescriptions by the end of consultation or end of day

It is not clear if this rule applies to over the phone or online written prescription requests. There may well be a significant uptake in written prescription requests, which will take time for a veterinary surgeon to do. If they need to be done by the end of the day, then we need to be able to charge appropriately as it is likely we will need to block off some vet's time to do written prescriptions when they could be consulting.

10. Requirement to contact customers at specified times to ask for their default preference for repeat prescriptions

It is not clear what these times will be – I feel it would be more appropriate to inform owners that there is an option to request a written prescription at the time of prescribing the medication. For small businesses, the default should be our own practice stock unless the owner specifies otherwise, which they are welcome to do. But to set the default to written prescriptions will cause confusion in owners that haven't used online pharmacies before, and will cause a huge drop in our product sales, which as explained above will only have the effect of pushing up service fees, costing the owner just as much in the long term, as we cannot absorb the drop in profit as a small business. Pushing up service charges in our area will make us more expensive than others, contrary to your research, and so we may start to lose clients to the corporates, or the corporates will match our prices and pet owners will pay more overall.

11. Requirement to charge no more than £16 for providing a written prescription... charging a single prescription fee per consultation.

The price simply does not reflect the time, knowledge, and qualifications necessary to write a written prescription, and if this includes VAT, this is well below any of our local practices current fees. If we must do multiple prescriptions in one consultation, there is no time saving, and so we double the time taken to do the scripts, but with zero additional income to reflect this. This will have a significant effect on our profits from medicines, and as previously explained, will have effects on service charges, or on the ability for small independent practices and their shareholders to survive financially.

It is not clear if the single fee per consultation will be applied to repeat requests too – eg a client is on a repeat prescription for 4 different medicines and requests them all at the same time.

13. Requirement to offer communal cremations... observe "cooling off" periods.

There needs to be clarity of the cooling off periods – if every single euthanasia (rather than only owners who are undecided on cremation option) needs to be stored for 1 working day before collection to crematorium then this will be practically very difficult to achieve. We would likely need to purchase more storage freezers and we have no space for these to go. There is a high risk of errors with trying to keep track on which bodies can go, and which need to wait 24 hours, unless we constantly must move bodies from a holding storage freezer into the "to go" one – this is labour intensive and time consuming. This needs more clarity and thought.

I feel where owners are undecided, the minimum 2 working days to make their decision is sensible, and adequate, and I don't feel that owners who have made their decision clear require a cooling off period.



Thank you for reading my response and taking these points into consideration.

Kind regards,

[Redacted]

[Redacted]