

We received 7 submissions which used the template related to Ferndown Family Vets.

Response to CMA Provisional Decision

Submitted by:

Practice:

Date: November 2025

I welcome the investigation into the veterinary sector to improve transparency and competition for pet owners promoting informed choice and high-quality care.

However, several of the **proposed remedies** — though well-intentioned — **will significantly disadvantage the ‘fear free’ independent practice Ferndown Family Vets** where I work. We offer a bespoke and personalised service at a competitive price.

Your proposals would result in increased administrative burdens with significant revenue reductions which will impact our owners and pets directly as our cost of services will have to increase to continue to provide the same level of care potentially making veterinary care inaccessible to many more.

As a practice we have organically gained 159 5-star google reviews ... what we do works. Our clients are happy and their pets are happy.

Please come and visit us to understand the importance in offering clients choice.

1. Financial Sustainability and Lost Revenue

At Ferndown Family Vets we would **lose approximately £** [REDACTED] income from all medicine sales and prescription fees. [REDACTED] % of our **current turnover with profit of [REDACTED] % in 24/25.**

If revenue from prescriptions decreases:

- Consultation fees and treatment prices will **inevitably rise** to offset.
- Less time in the consultations themselves to discuss patient care as we will be discussing prescription and drug economies instead. 'You will likely be able to get this drug significantly cheaper online' is not something any vet should be saying when trying to help an owner as it does make us sound money-grabbing.
- Smaller independent practices may become financially unviable, further **reducing competition and local access to care.**

Recommendation

Don't cap prescription charges. Give owners choice through your plans regarding transparent pricing lists and estimates ahead of procedures and leave prescription fees alone and remove active discussions for sourcing cheaper medication online.

2. Online Pharmacy Ownership and Market Fairness

Prescription capping is not the solution for helping independents and drug prices - we are expensive because our wholesale prices are more than online pharmacies (corporate owned). They can **purchase medicines at significantly lower prices** than us.

Your webinar on the 29th October **stated we can purchase our drugs competitively with online groups** if we are with a buying group. We have included the rebate in our calculations and **we cannot** as our wholesale prices are still significantly higher.

Example 1: Amodip; pet drugs online £ [REDACTED]; vetsure £ [REDACTED]

Example 2: Apoquel 16mg; pet drugs online £ [REDACTED]; vetsure £ [REDACTED]

Example 3; propalin; pet drugs online £ [REDACTED]; vetsure £ [REDACTED]

Example 4; onsior 20mg; pet drugs online £ [REDACTED]; vetsure £ [REDACTED]

This is not fair to independents and we do not have access to corporate white label products, nor will we ever have the influence to do this.

Recommendation:

We cannot compete fairly, a level wholesale price structure is required.

The CMA needs to be transparent in communicating to clients in capping

prescription fees and directing them to online, veterinary fees will increase significantly in independents. I think it is reasonable to assume we will be more expensive than corporates and this will have an impact on small businesses (redundancies, closure, selling to corporate). Your actions will reduce competition.

If you want cheaper product pricing, look at the cascade. This would still financially impact us significantly but at least it would be fair as corporates would not be the beneficiaries.

Example 1 → Fluoxetine generic online 30pk 20 mg [REDACTED] but we have to prescribe Reconcile 16mg 30pk for £ [REDACTED]

Example 2 → Chloramphenical through wholesaler £ [REDACTED] exc VAT, pharmacy is cheaper

3. Impact on Competition and Consumer Choice

We as an independent will lose revenue and the service to clients and pets will be significantly affected and altered whilst corporates will benefit from forced conversations where you require us to tell them they can likely source the medication cheaper online.

Recommendation:

No prescription cap and just advice as we do now that we can write a prescription.

4. Prescription Timelines, Cost Recovery, and Security

Same-day prescriptions will be a challenge and harmful to animal welfare.

1. When **patients are ill and suffering**, they **cannot wait** for a prescription to be supplied and for their owner to then order medication which could take a few days depending on postage.
2. If a patient presents ill and in pain, **professional vets should be able to use their knowledge and experience to prioritise animal welfare decisions and give medications in the animals best interest**. Clients should not be deciding what is good animal welfare based on where they can get essential medications cheapest where there will be a 48 - 72 hour delay in the medications reaching the patient.
3. No significant cost saving to the business if we moved to more medications online as we would still require in house pharmacy to provide on the day medications but with lower numbers being purchased for a small 2.5 FTE Vet practice, the rebates and

discounts would be tiny.

4. Some days we do see lots of ill patients and emergencies and the system requires manoeuvrability. Same day deadline removes this but **we cannot be staffed for all eventualities** and just in case moments **without increasing professional fees significantly** if your prescription cap goes through.
5. A lot of medications according to **SPCs require a check up 5 - 7 days** for assessment if animal is OK (they can't tell their humans how they feel so clinical examination is the only indicator of issues). It is normal to dispense a short course and then continue long term... then a prescription would be warranted if looking at long term use.

Recommendation

- We offer a **72-hour prescription turnaround** and clients have always been happy with our service, plus the prescriptions are ready without causing detriment to patients requiring care because this permits manoeuvrability on days where lots of emergencies occur.
- Agree **prescriptions to be offered for longterm medications and parasite treatment** but still impacts business by approximately £ [REDACTED] ([REDACTED] % turnover) so can't be **£16 nor 24 hour turn around**.
- The CMA must highlight in directing people to online pharmacies with capped prescription charges, professional fees will increase more than inflation.

- **£26.50 prescription** please. To rise with inflation. In line with professional time spent; approximately **8 minutes**, £26.50 in calculated salaries of people and equipment involved. Prescriptions require **time and accuracy checks**.

<https://ferndownfamilyvets.co.uk/repeat-prescriptions>

- Please note for written prescriptions there is a £26.50 for the first medication, £44.75 for two items of medication and £57.20 for 3 items of medication. This is payable before the prescription is supplied (we will contact you to organise payment).
- Clients often need to confirm the quantity, repeats, or chosen pharmacy — this stops same day turn around if they are unsure at first comms.

5. Prescription Fraud and E-Delivery

- Many practices have or want to move away from physical prescriptions due to **forgery, date alteration, and multiple redemptions** but we do not have the infrastructure like the Netherlands. This is a priority before any changes are forced through.
- Hand written prescriptions can't happen (also need to scan etc before client leaves). Even same day emailed copies **increase fraud**.
 - Example - clients can go to 3 online sites and order on the same day to acquire 3 deliveries of their meds, potentially giving them 3 years of parasite treatment. **This is dangerous and in breach of RCVS code of conduct regarding clinical examination intervals.**
 - Example - clients with great digital software can edit and make it look new and re-use.

Recommendations:

- Start with transparencies (pricing, estimates) and signage but re-evaluate rules regarding prescriptions and medications until technology fully implemented.
- Stop fraud and put secure system in place **send prescriptions directly to a nominated pharmacy** → infrastructure missing and must happen first.

- CMA to work with PMS systems, pharmacies and RCVS with cascade then come back to FOPs. Estimate 1 - 2 years.

6. Pricing Transparency and Comparison Platforms

Transparency yes but we need to be wise in what we list to not mislead and as a consequence damage trust.

I write this because even a bitch spay can be different from one practice to another so to compare prices of mass removals where if it is neoplastic an ultrasound may be required or other further diagnostics, basing decisions on price alone can be very confusing to the public who are not degree holders.

- We currently do this and it has worked really well along with estimates ahead of the day they are coming in for the procedure ...

<https://ferndownfamilyvets.co.uk/price-list>

Every practice should have policies and inclusions in their terms and conditions with a contact detail to enquire about costs.

- We challenge being combined with other independent practices. We are all unique and operate differently. We even challenge combining all corporate branches to be misleading too. Ultimately each practice runs dependent on the team on the floor.

Recommendations:

- The CMA must communicate to clients they must take responsibility in sharing their cost concerns with us. Our priority is animal welfare.
- Comparison platforms must have the ability to show **exactly what is included** in each price and not throw in all independents into one, or combine branches of corporates together either.
- Practices should be able to have flexibility for **clinical or case-specific variations**.

7. Veterinary Medicines Directorate (VMD) and the Cascade

- **VMD regulatory framework and cascade are not fit for purpose** and increasingly place veterinary professionals in conflict with owners who do not understand our legal restrictions, particularly frustrating when we all can see cheaper and equally effective human-licensed medicines that vets are **legally prevented** from prescribing for cost reasons alone, impacting animal welfare.

Example 1 → Fluoxetine generic online 30pk 20 mg £ [REDACTED] but we have to prescribe Reconcile 16mg 30pk for £ [REDACTED].

Example 2 → Chloramphenical through wholesaler £ [REDACTED] exc VAT, pharmacy is cheaper

Recommendation:

Review VMD and cascade restrictions in parallel with the CMA reforms. Allowing appropriate flexibility in medicine selection would directly support **affordability, fairness, and animal welfare.**

8. Referral Processes and Complex Procedures

We support that clients should receive estimates for veterinary care, while also recognising that a patient's treatment plan can change rapidly as their disease process deteriorates, new diagnosis is gained or new information appears.

- Complex and emergency cases often **cannot be accurately priced in advance** without diagnostics.
- Requesting multiple estimates from specialist centres will substantially increase **administrative workload** for clinical teams. We estimate 20 - 30 minutes of nursing time, equivalent to £30 - 60.

Recommendation:

- Estimates for **routine, fixed-price referrals** (e.g., imaging, elective surgery) must have a range and understanding costs may change.
- Complex or urgent cases should have wider ranges given and an understanding vets will work in the best interest of the animal in a welfare/emergency situation.
- We inform clients of potential referrals. If they want more information, they call different referral services to work out their best choice akin to choosing first opinion practice.

9. Practical and Technological Implementation

Same-day prescriptions, automatic data uploads to comparison sites, and digital complaints systems — require **technological infrastructure** that currently does not exist across most practice management systems. Will cost too increasing fees to clients.

Recommendation:

Provide an **extended 18-month implementation period** following the final order and the CMA to engage directly with PMS developers, RCVS, and professional bodies to ensure realistic, secure delivery.

Conclusion

As an employee at Ferndown Family Vets, this investigation has saddened me. A lot of the pricing recommendations and estimates we already do and it works as we have a great reputation with our clients.

These changes will ultimately impact negatively on our patients and clients, as well as our staff in a profession that is already undervalued at the best of times.

I chose to work in an independent family owned practice instead of a corporate and am saddened to see a solution favouring corporate dominance.

Please come to our practice and see what we do. Let us share what we are about. We are like no other and this gives people choice.