

Priory Veterinary Group

5 November 2025

Veterinary Market Investigation Team
Competition and Markets Authority

Subject: Response to CMA Provisional Decision – Veterinary Market Investigation

Dear Sir/Madam,

I write in response to the CMA's provisional decision published on 29 October 2025. While I welcome the CMA's continued focus on transparency and consumer protection, I remain deeply concerned that several proposed remedies risk undermining patient welfare, distorting public understanding of veterinary care, and disproportionately burdening independent practices.

1. Ownership Transparency

The proposal to mandate disclosure of practice ownership is a positive step, but it remains insufficient. True transparency must include service quality, continuity of care, and clinical standards. Without this, pet owners may assume all practices offer equivalent care, when in reality independent practices often provide more personalised, consistent, and ethically driven services.

2. Price Transparency

The CMA's push for standardised price disclosures for common procedures continues to ignore the vast clinical variation behind each service. Procedures differ in anaesthetic protocols, monitoring, post-operative care, and owner communication. Reducing these to a single price point misleads clients and incentivises bare-minimum care models, eroding trust and welfare.

Moreover, publishing headline prices online risks creating a race to the bottom. Independent practices that include essential elements as standard will appear more expensive, even though their care is safer and more comprehensive. This undermines informed decision-making and penalises practices that prioritise transparency and quality.

In addition, Clients on our practice healthcare plan attend on average 3.4 times per year, considerably higher than the two consultations per year the CMA suggests, demonstrating greater engagement and clinical contact than the provisional decision assumes.

3. Prescribing and Medicine Margins – A Dangerous Oversight

The CMA's continued scrutiny of medicine pricing fails to account for the economic role these margins play in subsidising consultations. Eliminating mark-ups without adjusting for the increased administrative burden (for example, producing written prescriptions and detailed estimates for every treatment option) will force consultation fees to rise, reducing access to veterinary advice and delaying treatment decisions.

Veterinary professionals operate under strict prescribing regulations, including the cascade. Implying financial motives drive prescribing decisions is both inaccurate and damaging. The CMA must not create a regulatory environment that penalises vets for adhering to legal frameworks while trying to support clients in financial difficulty.

A single flat prescribing fee of £16 for all drugs does not remotely compensate for the professional time, clinical judgement and legal responsibility involved in prescribing. The fee must cover: the vet's review of the patient records; clinical decision-making; discussing drug choices, side effects and contraindications with the owner; any necessary phone follow-up; the training and qualifications behind those decisions; and the time taken to prepare, print and sign a prescription. At our practice we have calculated that a vet needs to earn £279 per hour ex VAT to cover our fixed costs. That figure predates the recent increases in national insurance, tax and inflation this year. A £16 fee implies these tasks should be completed in well under three minutes — including discussion, documentation and authorisation — which is unrealistic and unsafe. Having timed myself recently when filling out three written prescriptions for a cardiac case, I can report it took me just under 15 minutes to check the doses, fill out the prescription, update the notes, print and sign the prescriptions and copy back onto the notes for compliance and this was a case I knew very well and does not include the discussion time with the owner. I challenge the CMA to explain how clinicians can responsibly fulfil their duty of care within that time and with that level of remuneration.

4. Out-of-Hours Services

The proposal to open out-of-hours provision to all clients risks destabilising independent practices. Restricting OOH care to registered clients supports continuity, safety and trust. If independents lose control over emergency provision they may be forced to outsource, fragmenting care and undermining client relationships.

5. Veterinary Nurses — Role Clarity and Legal Safeguards

I support legal protection of the veterinary nurse title. However, expanded responsibilities must be matched with clear accountability frameworks. Without appropriate legal safeguards, veterinary surgeons remain unfairly liable for decisions beyond their control. Nurses must not be used as cost-saving substitutes for vets; their scope must reflect their training and qualifications rather than financial pressures.

6. Administrative Burden and Implementation Periods

The administrative demands implied by the CMA's remedies are absorbable for large corporate providers but disproportionately punitive for independent practices. Excessive compliance tasks shift time away from patient care, increase running costs, and require skills many clinicians do not have capacity to perform. Implementation timelines must reflect the resource constraints of smaller providers and include transitional support to avoid unfairly driving independents out of the market.

7. Mental Health and Workforce Sustainability

The proposals do not adequately consider the emotional toll of increased financial pressures and regulatory scrutiny on the veterinary workforce. Rising fees, reduced autonomy, and increased client distress will exacerbate burnout and attrition. The CMA must assess how policy changes will affect workforce sustainability and the profession's capacity to deliver humane, timely care.

Conclusion

The CMA's intentions are commendable, but the current proposals risk reducing veterinary care to a transactional model that ignores complexity, ethics and emotional labour. True transparency empowers clients to understand the care their pets receive — not merely the price they pay. I urge the CMA to revise its approach to protect patient welfare, support independent practices, and ensure veterinary professionals can continue to provide compassionate, sustainable care.

Yours sincerely,

A solid black rectangular redaction box covering the signature of the sender.

Director, Priory Veterinary Group