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Competition and Markets Authority

14th November 2025

Re: Response to CMA Provisional Recommendations on the Veterinary Sector

Dear Sir or Madam,

We welcome the Competition and Markets Authority's (CMA) investigation into the veterinary sector and your aim to improve transparency and competition for pet owners. As veterinary professionals, we are committed to fairness, informed choice, and the delivery of high-quality animal care. Across all business structures — corporate, independent, charitable, and joint venture — veterinary teams comprise some of the most diligent and compassionate individuals, holding themselves to exceptionally high professional standards. Many share the same frustrations as pet owners, facing daily ethical challenges while striving to balance clinical care with the financial realities of running a viable, fairly staffed business.

While we support the intention behind many of the CMA's proposals, several measures risk producing unintended consequences that could undermine clinical standards, increase administrative burden, reduce appointment availability, and disadvantage independently run practices. We offer the following points as constructive feedback informed by frontline clinical experience.

1. Ownership Transparency

We support the CMA's intention to increase transparency around ownership; however, the current proposals do not go far enough. Many clients remain unaware that practices they perceive as independent are in fact owned and controlled by large veterinary groups (LVGs). Presenting LVG logos in a secondary or minimal position does not deliver meaningful transparency.

Recommendation:

- LVG branding should be displayed as **primary** rather than secondary.
- Wording should clearly state that the practice is "**owned and controlled by**" the corporate group, not merely "part of a group."
- Clear ownership transparency is essential for informed consumer choice and fair competition.

2. Online Pharmacy Ownership and Market Fairness

The CMA's recommendations do not fully address the competitive distortion created by corporate ownership of online pharmacies. Large veterinary groups owning or affiliating with online pharmacy businesses allows them to profit twice: through the practice and the retail pharmacy arm. Their centralised buying power secures wholesale prices that independent practices cannot match.

Independent practices often find their wholesale costs exceed online retail prices from corporate-owned pharmacies, making fair competition impossible.

Recommendation:

The CMA should urgently review cross-ownership structures and supply chain pricing. A level wholesale pricing framework must be established before mandating reduced prescription fees or same-day service requirements.

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3. Prescription Timelines, Cost Recovery, and Security

Mandating same-day prescriptions risks compromising clinical accuracy and overwhelming practice capacity. A 48-hour turnaround remains both safe and achievable.

Fraud and Delivery:

Printed or client-emailed prescriptions significantly increase fraud risks, including forgery and multiple redemption. Direct, secure transmission from practices to pharmacies is the safest approach.

Digital Infrastructure:

A nationally secure digital prescription system integrated with practice management systems would require 12–18 months to design and implement.

Recommendations:

- Retain the safe and practical 48-hour standard.
- Encourage direct secure transmission to pharmacies.
- Extend implementation timelines to ensure security and feasibility.

4. Pricing Transparency and Comparison Platforms

Price transparency must not oversimplify the complexity of veterinary care. Procedures vary widely by patient condition, diagnostics, and included services such as fluids, analgesia, anaesthetic monitoring, or imaging.

Recommendations:

- Require platforms to show precisely what each price includes.
- Allow flexibility for case-specific variation.
- Provide educational material for owners on clinical standards and the Cascade.

5. Veterinary Medicines Directorate (VMD) and the Cascade

Current Cascade restrictions increasingly place veterinary teams in conflict with clients and impose unnecessary financial barriers, particularly impacting wildlife, charitable work, and low-income households.

Recommendation:

The government should review VMD regulations and the Cascade in parallel with CMA reforms to improve flexibility, affordability, and animal welfare.

6. Financial Sustainability and Lost Revenue

Reductions in income from prescriptions and medicines will inevitably shift costs onto consultations and treatment fees. Smaller independent practices are particularly vulnerable. Veterinary services are also subject to 20% VAT, representing a significant and inequitable cost to owners.

Recommendation:

Impacts on financial sustainability must be fully acknowledged, and VAT reform considered as a more effective lever for affordability.

7. Referral Processes and Complex Procedures

Although routine services can be estimated accurately, complex or rapidly evolving cases cannot. Requiring multiple specialist estimates introduces substantial administrative pressure without improving care.

Recommendation:

Maintain flexibility for complex cases. Practices should signpost referral options, but the responsibility for seeking multiple estimates should remain with the client unless clinically necessary.

8. Insurance Misunderstanding and Client Expectations

There is a risk that reforms could reinforce the misconception that veterinary care will become significantly cheaper, discouraging insurance uptake. This may increase complaints and reduce owner preparedness.

Recommendation:

Public communications must clearly state that these reforms do not eliminate the need for pet insurance or financial planning.

9. Impact on Competition and Consumer Choice

By applying restrictions without addressing corporate vertical integration, the reforms risk strengthening corporate dominance while undermining independent practices.

Recommendation:

The CMA should assess whether proposals inadvertently consolidate corporate control and consider protections for smaller practices.

10. Practical and Technological Implementation

Several proposed remedies rely on infrastructure not yet available within most practice management systems.

Recommendation:

Allow an 18-month implementation period after the final order and collaborate closely with PMS developers, the RCVS, and professional bodies.

11. Own-Brand POMVs and Market Lock-In

Corporate-exclusive POMVs undermine prescription portability and restrict client choice. Clients cannot obtain these products elsewhere, locking them into specific groups and preventing genuine price comparison.

Recommendation:

Require all POMVs to be available to all veterinary practices and licensed fulfilment providers.

12. Cremation Services and the 24-Hour Cooling-Off Period

We support the principle of transparency in end-of-life services; however, the mandatory 24-hour cooling-off period risks undermining trust between clients and their veterinary team at a highly emotional time. Clients who have made a clear, informed decision may find enforced delays distressing. Where collection schedules are infrequent, this may delay cremation for more than a week, placing unnecessary emotional and logistical strain on both clients and practices.

Recommendation:

- Allow veterinary professionals discretion to waive the cooling-off period when the client has clearly expressed an informed decision, **or**
- Require crematoria to hold remains for 24 hours before cremation, rather than placing this obligation on practices.

Conclusion

We share the CMA's objective of enhancing transparency, fairness, and client confidence. However, without careful adjustment, several proposals risk increasing operational pressures, reducing access to care, entrenching corporate dominance, and compromising both clinical autonomy and animal welfare.

We encourage the CMA to continue working closely with veterinary surgeons, RVNs, the wider veterinary team, the RCVS, and the VMD to ensure reforms are practical, safe, and supportive of both pet owners and the professionals who care for their animals.

Thank you for considering our response.

Yours faithfully,



On behalf of the Veterinary Team of Portland Vets

