



Position on CMA provisional decision on the supply of vet services for household pets

Introduction

The RSPCA is pleased to respond to this consultation on the CMA's provisional decision on the supply of vet services for household pets. The RSPCA is the oldest and largest animal welfare organisation in the world. Last year we dealt with over 900,000 calls to our cruelty line, dealt with over 81,000 welfare incidents, dispensed 79,000 treatments neutered over 26,000 animals and rehomed over 26,000 animals. We have over 70 vet clinics, rehoming centres, wildlife centres and equine centres in England and Wales.

Our answers to the CMA position are summarised below:

Framework, form Implementation

Proposal: veterinary businesses must have in place written policies and processes in their FOPs to ensure that vets and vet nurses are able to act in accordance with those parts of the RCVS codes of professional conduct and supporting guidance that relate to providing pet owners with independent and impartial advice and appropriate and timely information about treatment options and prices.

For the majority of our remedies, an implementation period of three months for larger veterinary businesses and six months for the rest from the time at which we make our CMA Order and the remedies come into force.

RSPCA position

We agree with this but recognise the limitations without a new Veterinary Surgeons Act. There is widespread agreement, including from the Chief Veterinary Officer and the Defra Secretary of State, that the Veterinary Surgeons Act 1966 is dramatically out of date. The individual professionals carry all the risk and the businesses are making all the profit. This has been very evident even during the running of this inquiry. A new Veterinary Surgeons Act is in the Government's timetable and we hope to see it in the next Kings speech in 2026 as a priority legislative goal. We don't believe that the CMA interim report covers the role and responsibilities of veterinary businesses in relation to animal welfare and would like to see more explicit language in this area.

Animal welfare should be at the centre of any discussion on veterinary services. Whilst it is important that the CMA is looking at this issue through the lens of consumer choice, leading to statements such as "it is, therefore, particularly important that consumers are provided with the information they need at the right time so that they can choose the treatment plan that is right for them" the overall outcome must surely be improved animal welfare, not clients being able to demand services that go against the veterinary oath because they compromise animal welfare. The difficult discussions around euthanasia on

veterinary or medical grounds is perhaps the best example of where a client could demand a procedure which is against veterinary advice or indeed the oath taken at the end of veterinary studies. The CMA should think about how animal welfare is considered foremost in this inquiry and the RSPCA would be happy to have further discussions on this difficult, emotive but vital issue.

Pet owner empowerment remedies

Prosposal: Practices offering a pet care plan would have to set out the prices of the individual components of the plan as well as the total plan price

We propose to make it much easier for pet owners to choose a veterinary practice that meets their needs by requiring veterinary businesses to provide pet owners with information on who owns the practice and its prices for a standard list of services. A comparison website would be on the RCVS site.

RSPCA position

We believe this proposal is naive and fails to recognise the complexities of treatment plans. Price lists for more common procedures will almost certainly result in “loss leaders” being created and costs being raised elsewhere, most likely to be on the less routine interventions. As these generally occur when the pet is unwell, as opposed to predictable treatments we believe this could cause welfare detriment.

The veterinary industry is unusual in that the beneficiary is not, ultimately, the consumer, but their animal. It is crucially important that any changes are assessed through the lens of animal welfare impact. Requiring costs to be published feels likely to just drive the profession to run “loss leaders” and drive up costs elsewhere, with possible (probable) animal welfare detriment. We would support measures that decouple first opinion and referral levels services and ensure that first opinion practice can be viable as stand alone businesses

Choice of treatments referrals, diagnostics

Proposal: when a treatment either at the FOP or outside the FOP is being recommended and considered, and it is reasonably foreseeable that it will cost £500 or more, the veterinary business would be obliged (other than when immediate treatment is required) to offer a written estimate of the cost, including any aftercare

RSPCA position

We support this but in our experiences this is already happening in the vast majority of practices.

Medicines market opening remedies

Proposal: all pet owners with animals with an on-going need for medication must be given a written prescription to enable them to buy the medicine (usually at a much lower cost) online; pet owners must be explicitly informed at certain moments that they can obtain a written prescription and that medicines are usually cheaper online.

RSPCA position

We are very concerned with this proposal and do not agree with the CMA recommendation that prescriptions must be given. The RSPCA has concerns about compliance and delays in starting

treatment and the probable animal welfare impact. This will likely lead to vets stocking less drugs, which could exacerbate treatment delays and resultant animal welfare harms.

The RSPCA has seen a rise in online web searches for 'Can I give my dog paracetamol?' in recent years have suggested more people may be considering self-prescription for their pets at home. There were 44,900 Google searches for this term between April 2023 and March 2024.

A written prescription must never be used or given when there is an immediate welfare need to stop the suffering of the animal. The RSPCA last year undertook 70,438 treatments on animals, many of whom needed immediate treatment either because of a lack of care from the owner or because the animal was involved in an accident. In either case, merely offering prescriptions would exacerbate delaying treating that animal and would lead to suffering.

This CMA position is particularly concerning given that there is no action being taken to break up the ownership of large vet groups and online pharmacies by the same companies.

Medicines: prescriptions controls and medicines process controls

Proposal: *set a maximum price for providing a written prescription at £16 which is below the current average (median) across the market – which is £20 – but roughly equal to the average price charged by independent FOPs.*

RSPCA position

We support this proposal.

OOH contracts

Proposal: *OOH providers would be prohibited from imposing unreasonably long termination periods in their contracts with FOPs. This would make it easier for FOPs to end such contracts*

RSPCA position

We support this proposal.

Cremations

Proposal: *All FOPs' would be required to offer the option of a communal cremation and to set out the full range of options available to pet owners and to clearly set out the prices of (more expensive) individual cremations and any optional add-ons*

RSPCA position

We support this proposal.

We are surprised to see that there is no mention of breaking up the integration of corporate groups with cremation companies, referral services, labs and online pharmacies. This is a massive gap and believe the CMA should consider this issue in its final decision. Merely stating that FOPs offer the prices and options without tackling the underlying structure of cremations and its integration with referrals and online pharmacies could exacerbate rather than solve this problem..

Complaints and redress

Proposal: FOPs would be required to have an in-house complaints system which meets certain criteria, including informing pet owners of how to complain, and what to expect from the process. FOPs would also be required to engage in mediation if the pet owner wished

RSPCA position

The RSPCA believes this already is the process in the vast majority of practices. It is critically important that any complaints process sets out to the pet owner that the responsibility of the vet is ultimately to the welfare of the animal in their care, not the owner.

Future regulatory reform

Proposal: RCVS to have a more significant role in reforming this market, for example through monitoring compliance by veterinary businesses with the requirements we would impose on them, by hosting a price comparison website and by taking other actions to support our remedies (such as assessing data on complaints).

Additional costs incurred by the RCVS to undertake monitoring and certain other activities (such as collating information for Find a Vet and improving its functionality) would be funded by a levy on veterinary businesses in proportion to their size, around £330 per FOP per year for the monitoring role, if they were comparable to the costs of running the current PSS

A new Veterinary Surgeons Act is urgently needed to impose a duty on the regulator to protect competition and consumers (that is, pet owners) as well as its principal obligations in relation to animal welfare and public health.

RSPCA position

We agree with this proposal

Overall effectiveness of reform package

RSPCA position

The RSPCA is very disappointed with the remedies offered in this draft decision as they appear to have been substantially watered down since the previous stage of the consultation. We have concerns that there is a genuine risk of animal welfare harm from the measures and as the largest organisation that deals with animal welfare cruelty and suffering, we are concerned that some of this harms will land on the RSPCA, through for instance more people not visiting vets with their animals or diagnosing and treating their animals without referral to a vet.

We have concerns that costs will simply be loaded onto unwell animals, with its implicit welfare detriment.

We are disappointed that recommendations on transparency of practice ownership will not extend to transparency on ownership of related services such as crematorium and would recommend this is addressed in the CMA final decision. It is not going to be made clearer, or the ownership of different services by the same company broken up. We are disappointed that there is no mention of this cascade

within business groups.