

10th November 2025



Competition and Markets Authority

St George's Veterinary Centre Ltd
Holland House, Old Heath Road
Weybridge KT13 8UF
T: 01932 858890
E: stgeorgesveterinarycentre@gmail.com

INVESTIGATION INTO VETERINARY SERVICES FOR HOUSEHOLD PETS

Dear Sirs

EXECUTIVE SUMMARY

St George's Veterinary Centre welcomes the CMA's commitment to improving transparency and competition in veterinary services. As a small independent practice serving the Weybridge, Surrey community since 2011, we share the goal of ensuring pet owners receive fair value and appropriate care for their animals. However, we have significant concerns that the proposed remedies, while well-intentioned, may disproportionately burden small independent practices and potentially undermine the very competition the CMA seeks to protect.

PRACTICE BACKGROUND AND CONTEXT

St George's Veterinary Centre operates as a single-site independent practice. Our location within the M25 corridor subjects us to significantly higher property and operational costs compared to practices outside London. Despite these challenges, we have invested over £2500,000 to-date in the practice and modern equipment to provide high-quality care.

We strongly support the CMA's findings that independent practices generally provide better value and customer satisfaction than large veterinary groups (LVGs). The report confirms that "independent practices are on average cheaper (but are perceived to provide similar or higher quality) than many practices which are part of LVGs". This validates our business model of combining competitive pricing with exceptional care through personal relationships and transparent communication.

CURRENT MARKET PRESSURES

The CMA correctly identifies post-Brexit and COVID-19 staffing challenges as significant market factors. However, the report underestimates the severity of these pressures on small independents. Our locum veterinary costs have more than doubled from £250/day pre-Brexit to £500-600/day currently. With wage costs representing over 30% of our turnover, these increases create existential pressures that LVGs, with their economies of scale, can better absorb. It is a similar situation with veterinary nurses.

The CMA notes that "more vets work part time or flexible hours than in the past, meaning that a greater number of vets are required to provide the same level of service". This structural change particularly impacts small practices that cannot easily accommodate increased staffing complexity.

SPECIFIC CONCERNS WITH PROPOSED REMEDIES

1. Disproportionate Administrative Burden

While we support transparency principles, the proposed remedies create significant administrative burdens that will disproportionately impact small independents. The CMA estimates implementation costs of "around £330 per FOP per year for the monitoring role" plus additional costs for website updates and surveys. For a practice of our size, I expect these cost will be significantly higher, once you factor in time for analysing and responding to client survey responses. There will be a meaningful investment in time, taking staff away from offering frontline services.

The requirement for comprehensive website price lists covering "consultations, OOH consultations, vaccinations, fees for providing a written prescription, other administrative fees, neutering, microchipping, routine dentistry, a range of common scans, diagnostic tests and surgical procedures, and euthanasia and cremation costs" fails to recognize that veterinary medicine is bespoke healthcare where procedures vary significantly based on individual animal needs. Any pricing list will need to be heavily caveated.

2. Inadequate Exemption Threshold

The CMA proposes a six-month implementation period for smaller practices but fails to establish appropriate exemption thresholds. We strongly recommend that independent practices with annual turnover under £1.5 million be excluded from the most burdensome regulatory requirements. This would protect genuine small businesses while still covering the vast majority of the market through LVG compliance.

3. Impractical Pricing Requirements

Standardized pricing matrices are fundamentally incompatible with veterinary care. For example, a dental procedure for a 2kg Yorkshire Terrier requires different anaesthesia protocols, surgical time, and post-operative care compared to the same procedure for a 40kg German Shepherd.

The CMA's own analysis shows that "around 20% of treatments for which insurance claims were made over a 12 month period were £500 or more", indicating the complexity and variability of veterinary procedures.

4. Insufficient Prescription Fee Cap

The proposed £16 prescription fee cap is inadequate, particularly for practices in high-cost areas like the London and the South East. Our analysis shows that processing a written prescription involves:

- Veterinary time for clinical assessment and prescription writing (10-15 minutes)
- Administrative processing and record-keeping
- Regulatory compliance and liability

These costs, combined with regional wage variations, justify at least £20 + VAT minimum cap that better reflects true operational costs while remaining "roughly equal to the average price charged by independent FOPs". This service should not be loss making.

5. Unintended Consequences of Medicine Competition

We already inform clients that medications can be purchased more cheaply online and support increased competition in this area. However, the CMA's proposals will significantly reduce practice medicine revenues. The report notes that "many pet owners could save around £200 to £300 on average each year when purchasing medicines from an online pharmacy rather than a FOP". While beneficial for pet owners, this will necessitate increases in consultation and procedure fees to maintain practice viability. The CMA should acknowledge this reality and ensure that resulting fee adjustments are not mischaracterized as anti-competitive behaviour.

CONSTRUCTIVE ALTERNATIVES

1. Graduated Implementation

Implement a tiered approach where practices with turnover under £1.5 million face simplified requirements:

- Basic ownership disclosure and contact information
- Core service pricing (consultations, vaccinations, neutering)
- Simplified complaints procedures
-

2. Regional Cost Adjustments

Recognise geographical cost variations in fee caps and implementation timelines, particularly for practices within the M25 corridor where property and wage costs are substantially higher.

3. Professional Standards Focus

Rather than mandating specific pricing displays, strengthen existing RCVS Practice Standards Scheme requirements to ensure all practices meet appropriate quality and transparency standards through professional self-regulation.

MARKET CONTEXT AND VETERINARY VALUE

The CMA must recognise that veterinary care operates as private healthcare without NHS equivalent funding. Veterinary training requires 5+ years of university education (longer than medical doctors), yet veterinary consultation fees remain substantially lower than equivalent private human medical services, where private GP consultations typically cost around £100 for 10-15 minutes.

Most veterinarians choose this profession from passion for animal welfare despite earning less than doctors or other healthcare professionals. The proposed regulations risk undermining this professional dedication by creating bureaucratic burdens that detract from clinical care. Increasing the likelihood that owners of independent practices will sell up to a corporate to avoid the increased administrative burden.

Pet ownership represents discretionary spending, and owners should understand potential costs and insurance options before acquiring animals. The solution to affordability concerns lies in promoting pet insurance and responsible ownership education, not in price controls that may ultimately compromise care quality.

RECOMMENDATIONS

1. **Establish turnover-based exemptions** for practices under £1.5 million annual revenue
2. **Increase prescription fee cap to at least £20** with regional adjustments for high-cost areas
3. **Implement graduated compliance requirements** based on practice size and complexity
4. **Extend implementation timelines to 12 months** for all independent practices
5. **Focus regulatory efforts on LVGs** where the most significant market failures occur
6. **Strengthen RCVS oversight** rather than creating parallel CMA regulatory structures

CONCLUSION

St George's Veterinary Centre supports the CMA's goals of improving transparency and competition in veterinary services. However, the current proposals risk creating disproportionate burdens on small independent practices that already provide better value and service than LVGs. The CMA's own data shows that independent practices charge lower prices while maintaining higher customer satisfaction.

We urge the CMA to refine its approach to protect and strengthen independent practices as the primary competitive constraint on LVG pricing power. This requires proportionate regulation that acknowledges the resource constraints and operational realities facing small veterinary businesses.

The veterinary profession's commitment to animal welfare is best served by maintaining a diverse ecosystem of independent practices alongside larger groups, each serving different market segments effectively. Heavy-handed regulation that disadvantages independents will ultimately reduce competition and harm the very pet owners the CMA seeks to protect.

We look forward to continued engagement in this consultation process.

Yours faithfully



On behalf of St George's Veterinary Centre