

## Response to the provisional decision report published by the CMA on 15<sup>th</sup> October 2025 in relation to its Market Investigation into veterinary services for household pets

1. The Veterinary Schools Council (VSC) represents the United Kingdom's veterinary schools. Our Council is an authoritative voice on matters relating to veterinary education – from the selection, teaching and training of those who will be the future of clinical practice, to the clinical academics and researchers who are critically important to the health of both the animal and human populations in the United Kingdom.
2. We welcome the provisional decision report and the further clarity it provides on the CMA's proposed remedies. We continue to strongly support the CMA's advocacy for an updated regulatory framework and Defra's ongoing work towards this.
3. As outlined in our previous responses, we consider that other organisations will generally be better placed to comment on remedies concerning the business practices of entities providing clinical services to consumers, which broadly applies to **Remedies 1 to 16**. We do not, therefore, intend to comment individually on each of these remedies. However, there are some key principles underlying some of these remedies on which we do wish to comment.
4. We strongly support transparency in relation to practice ownership, pricing of routine products and services, and estimated treatment costs, and we very strongly agree that that veterinary surgeons should always be free to exercise their professional judgement when giving clinical advice or formulating diagnostic or treatment plans in consultation with pet owners. They should not be subject to policies or incentives that may directly or indirectly limit their range of options.
5. We believe that the needs of the United Kingdom's household pets and their owners, as well as the aspirations of current and future veterinary professionals, are best served by a market that can sustain both a sufficient overall number and a wide range of clinical service providers. We are concerned that the proposed remedies in relation to the supply of veterinary medicines by FOPs could put this at risk.
6. We note that the report sets out the CMA's view of a well-functioning market in the supply of veterinary medicines and welcome the acknowledgement that medicine revenues contribute to common costs. However, we consider that the CMA's conclusion *[that] a business model which is based on pet owners not being aware that they are paying significantly more than they need to for products such as medicines, and in which those prices are insulated from competitive pressure, is incompatible with a well-functioning market* (Provisional decision report: Part B, p.159)  
fails to give sufficient regard to a number of important factors behind why some FOPs may have higher medicine prices than competing suppliers other than excessive profit-

seeking, such as higher wholesale costs or larger overheads, and is therefore too simplistic to be used a basis for remedies.

7. We would encourage careful consideration of any proposed remedies that may have the effect of diverting a significant source of revenue away from FOPs and towards other suppliers that do not provide clinical services, such as online pharmacies, which could risk a diminution of the former and a proliferation of the latter. We would make the following general comments on this issue:
  - a) A requirement for FOPs to make consumers aware of the option to obtain a prescription and purchase medicines elsewhere is fair and sufficient.
  - b) There are many reasons why consumers may wish to purchase medicines from their FOP, which must be able to set prices that reflect the cost of provision plus a reasonable margin.
8. Ultimately, we would urge the CMA to give further consideration to whether, taken together, **Remedies 7 to 11** may pose a risk to the sustainability of some FOPs, whether this risk may be disproportionately high for independent practices, and if their implementation could ultimately lead to fewer providers and reduced choice for pet owners. We would also urge further consideration of the potential for waterbed effects and the associated impact of this on consumers.
9. We note that **Remedy 17** relates to a new regulatory framework for the provision of veterinary services. We continue to support many of the recommendations that were set out previously in the Remedies Working Paper, and which also appear in this report. However, we would make two specific comments in response to the updated proposals.
  - a) First, in our response to the Remedies Working Paper, we outlined our concerns in relation to a proposed new statutory consumer and competition duty on the veterinary regulator, and we note that this proposal has been retained in Remedy 17. We are not opposed to the introduction of such a duty, but it is our strong view that, if introduced in statute, it is explicitly *secondary* to animal health and welfare and public protection, not only *supplementary*. We consider that preserving clarity in the central objective of the regulator is essential to maintaining public confidence in the professions.
  - b) Second, we note that the report goes into significant detail in relation to the future structure and governance of the veterinary regulator. We acknowledge that proposals on such matters will be developed by the UK government, with appropriate regard for the CMA's recommendations, and we therefore look forward to the opportunity to review and comment on the government's proposals when they are forthcoming. However, we would urge caution in relation to any proposals that would involve significant additional up-front or ongoing costs, both of which would need to be recovered from registered individuals and businesses over time through increased fees, and which would ultimately be passed on in the form of higher prices for consumers.