

Competition and Markets Authority
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Consultation Response

Which? response to the CMA's consultation on its provisional decision in the veterinary services for household pets market investigation

Submission date: 14/11/2025

Summary

Which? welcomes the invitation to comment on the CMA's provisional decision in its market investigation. We would like to thank the CMA for its diligence and rigour in conducting this investigation and for the considered presentation of its findings. No-one engaging with this provisional decision can be in any doubt of the considerable effort and professionalism that has been spent to get to this point.

When we conducted our first research into veterinary services in Spring 2023 we were confident our research indicated it was not a well-functioning market. The CMA's evidence presented in part A (competition concerns) and the related appendices shows without doubt that there are features of this market that are causing substantial and persistent consumer detriment and that an extensive package of remedies is required to address this.

Our response focuses on part B of the provisional decision, the remedies. Designing a package of remedies to improve the functioning of a market inevitably requires considerable judgement about the optimal level of intervention. However, overall, we are very supportive of the CMA's package of remedies. The measures that the CMA can introduce through a CMA Order (or by accepting undertakings where appropriate) represent a proportionate set of interventions that can realistically be implemented, monitored and enforced.

Of course, the success of the CMA's work in this market will in part depend on whether the Government takes forward recommendation 17 to replace the existing, antiquated regulatory regime with a modern regime that befits the market as it is today. We hope that the Government acts at pace to do this, bringing forward legislation at the earliest feasible opportunity, and Which? will be advocating for it to do so.

Response to specific remedies

Pet owner empowerment remedies

- *Remedy 1: Require businesses providing veterinary services and online pharmacies to publish information on ownership*

We think this is a proportional and easily implementable remedy to improve transparency in the market. Consumer search may be wasted when consumers cannot discern whether two practices are owned by the same business and competition is undermined. Further, as both the CMA and Which? have found, some pet owners consider business ownership when making their choice of vet practice and this should be easy to ascertain.

We particularly agree that where a FOP directs consumers to a connected business, this connection should be prominently disclosed at that point and **we suggest the CMA makes this more explicit** than is currently drafted in the Notice of provisional findings.

- *Remedies 2a-d: Requiring the publication of basic service information, prices and information about pet care plans.*

The CMA has proposed a sensible package of remedies to address the numerous absences of information in this market. We agree that vet businesses should be required to provide information on all four areas covered by this remedy as they are important in pet owners' choice of vet practice and treatment option. We see the provision of such information as a necessary condition to facilitate effective competition in this market.

The choice of which services to include in the standard price list (remedy 2b) is inevitably a question of judgement, with the need to balance potential benefit to consumers with burden on businesses and the potential for unintended consequences (eg creating incentives for treatments not included in the price list to be substituted for those that are). We believe the CMA has undertaken a robust process to establish what should be included in the list and we are comfortable that the list proposed in the provisional decision strikes a reasonable balance.

We are also comfortable with the CMA's decision not to require the 2% of businesses that do not currently have a website or equivalent social media page not to create a website, but to require only that the price list be published in their premises.

- *Remedy 3: Require FOPs and referral centres to submit information to the RCVS for the RCVS to publish on an enhanced Find a Vet platform and share to selected third parties*

Digital comparison tools have been shown to be a powerful force for competition in a wide range of markets and we agree with the CMA that consumer search could be made easier,

and competition increased, by the presentation of information about veterinary practices on a comparison platform.

We support the CMA's decision for the initial focus of this to be for the RCVS to enhance the Find a Vet platform. However, we believe that there will be considerable benefits if this service can be opened up to competition as competing platforms will increase awareness of the existence of comparison tools. We therefore think it is important that the RCVS moves at pace to make the data accessible to approved third parties, but we note that there are no clear timelines for the RCVS to do this in the provisional decision. While we agree that this will take the RCVS longer than the time needed to set up the data collection, processing and publication processes, which is provisionally proposed to be nine months, **we encourage the CMA to specify an implementation period for the RCVS to make the data accessible to third parties** in its Order or in any undertakings from the RCVS. With regard to the approval process for third parties, we support the CMA's proposal that the process be developed jointly between the RCVS and CMA, that the process be administered by the RCVS, but that rejected parties can appeal to the CMA.

- *Remedy 4: Require the RCVS to commission and publish the results of a group-level pet owner survey*

We agree with the CMA that the market lacks reliable information about aspects like service quality, satisfaction and perceived value. In particular, whilst pet owners can compare individual practices through online reviews from other pet owners, it is challenging to assess the quality of a group as a whole. A group-level survey would give consumers an easily accessible tool to compare veterinary groups on a characteristic other than price. It could also give veterinary groups greater incentive to focus on customer satisfaction if there is a published comparison of groups based on this metric.

However, while we see value in a group-level survey (indeed we conduct and publish our own survey on this market), **we encourage the CMA and RCVS to carefully consider how to design this to deliver the greatest benefit**. We point to the [Banking Satisfaction Survey](#) as an example of where a similar remedy has been introduced with limited evidence of the impact. Which? analysis of this survey found that there has been no significant increase in banking satisfaction levels since its introduction.¹ Where small increases in satisfaction have been seen, it is accounted for by higher satisfaction with challenger banks like Monzo and Starling.² According to FCA Financial Lives Survey data, switching rates have not increased significantly in the several years since the survey was introduced.³ The CMA should consider

¹ Which (2023) - Have satisfaction scores improved service quality in banking for UK consumers?, accessed at:

<https://www.which.co.uk/policy-and-insight/article/have-satisfaction-scores-improved-service-quality-in-banking-for-uk-consumers-a7BYj5R1E7KC>

² Which? (2023) - Are younger consumers getting a better banking experience?

<https://www.which.co.uk/policy-and-insight/article/are-younger-consumers-getting-a-better-banking-experience-awLsL2C6bppR>

³ FCA (2025) - Financial Lives 2024 survey: Retail banking selected findings, accessed at:

<https://www.fca.org.uk/publication/financial-lives/fls-2024-retail-banking.pdf>

any learnings that could be taken from the introduction of similar surveys in other sectors, in order to maximise the benefit.

Choice of treatments, referrals and diagnostics

- *Remedies 5a and b: Written estimates for higher cost treatment options and itemised billing*

The lack of price information for pet owners has been consistently evidenced by the CMA and Which?'s research. One of the most striking findings of our primary research with pet owners in 2023 was that more than a third of pet owners only found out a price at reception after the appointment.⁴ We therefore strongly support the CMA's proposals for requirements to provide written estimates and itemised billing.

We believe the £500 monetary threshold for requiring a written estimate is high, but we recognise that the CMA is seeking to balance the benefit to consumers with the burden on businesses.

- *Remedy 6: ensuring vets and vet nurses can offer a range of treatment options*

We agree that in the absence of regulation of veterinary businesses this remedy is desirable. This is because the current regulatory framework cannot ensure that vets and vet nurses are not put under pressure, or made to feel they are put under pressure, to offer a range of treatments that is influenced by commercial preferences.

Medicines market opening remedies

We welcome the CMA's measures to increase competition between first-opinion practices and online pharmacies for the sale of medicines. Our response to specific remedies follows, but first we want to express support for the CMA's conclusion that it would be inappropriate to not introduce such measures because of concerns about waterbed effects, ie interventions lowering the profitability of medicines leading to higher prices for other services. We agree that there is only weak evidence that this might happen, and we fully support the CMA's conclusion that business models that rely on inadequate competition to overcharge some consumers for some services are not compatible with a well-functioning market (paragraph 5.138).

- *Remedy 7 – Information measures to increase awareness of online pharmacies and the amount that can be saved by using an online pharmacy rather than purchasing from the FOP*

⁴ Which (2023) - Consumer harm in veterinary services., accessed at: <https://www.which.co.uk/policy-and-insight/article/consumer-harm-in-veterinary-services-an9PT3b4Tb2B>

As the CMA shows, pet owners can make considerable savings by purchasing medication online rather than through their vet practice, and given the evidence that a sizeable proportion of pet owners are unaware they can purchase medication at online pharmacies it is important that there are information measures to improve awareness. We believe the measures proposed by the CMA are reasonable. For example, we support the use of standardised literature and the inclusion of a simple message around potential savings. With regard to the latter, while the inclusion of estimated or even average savings might help to encourage pet owners to shop around, we recognise that providing such information would be burdensome for vet businesses.

- *Remedy 8 – Measures to reduce barriers to pet owners purchasing (medicines) online*

We are pleased that the CMA has recognised that behavioural barriers, such as making customers return to the practice to collect a prescription, are likely to be a deterrent to shopping around for medication and that it intends to introduce measures to reduce these.

- *Remedy 10 – Choice of default for repeat prescriptions*

This is an interesting and, in our opinion, carefully targeted measure to reduce inertia among consumers. There is inevitably some uncertainty about exactly how this will change the behaviour of pet owners, but we agree that it has the potential to create considerable savings for some pet owners if it leads to greater shopping around for medicines.

Medicines: prescription price controls and medicines price controls

- *Remedy 11: Prescription price cap*

We support the CMA's decision to implement a price cap for providing written prescriptions. We agree that high prescription costs are a barrier to shopping around for medicines and that the evidence suggests that the fees currently charged for written prescriptions indicate they are not being constrained by competition, which is unsurprising because pet owners will not consider this contingent fee when choosing which vet practice to use and nor can they practicably switch vet practice at the point at which they learn they need a prescription.

In terms of the level of the price cap, we agree that £16 is reasonable given the data on the distribution of fees currently charged in the market and that setting the cap higher than this could cause consumer detriment. We see no reason for the cap not to apply to all businesses and are comfortable that it will increase over time in line with inflation as measured by the CPI. The CMA is right to consider measures to avoid the circumvention of the cap, i.e. by placing requirements on vet businesses.

We further support the CMA's decision not to introduce an interim price cap on medicines. Price caps are powerful interventions that carry considerable risks of unintended consequences. As such, we believe they should only be implemented in exceptional circumstances. Typically, this will include when there is no credible way of introducing

competition to make the market function better and that a cap is not overly complex in its design so that its implementation will not be overly burdensome. We do not believe these conditions hold in this case.

Cremations

- *Remedy 13: Transparency on the options and fees for cremations and ensuring that all pet owners have the option of a communal cremation*

The information requirements set out in remedy 13 are a reasonable intervention to help pet owners to make good decisions about what to do with a deceased animal. However, while the provision of such information is needed, there are numerous reasons why there is limited competition for these services and we fear the CMA's finding that the vast majority of pet owners don't compare different cremation providers will endure. As a result, the striking mark ups for these services are likely to persist. Unfortunately, we tend to agree with the CMA that no good remedy option exists to address this and we support the CMA's decision not to impose a price control on cremation fees. We feel this would be excessively interventionist, would require difficult design decisions, and could lead to unintended consequences that worsen consumer outcomes.

We hope that the CMA will be mindful of the challenges in this area when it evaluates the impact of its reforms in the future, and in particular that it analyses the prices of cremation services to make sure that the weakness of competition is not exploited.

Complaints and redress

- *Remedy 14: A requirement for all veterinary businesses operating FOPs to have an in-house complaints process for each of its FOPs which meets specified minimum criteria.*

We welcome remedy 14, which places a requirement on veterinary businesses to have an in-house complaints procedure meeting minimum requirements. The remedy accords with the recommendation in our [policy research paper](#) published earlier this year in which we found common problems with complaints and redress. For example, 16% of pet owners in our survey who experienced an issue but did not complain simply did not know how to go about it. We believe that requiring practices to clearly signpost their complaints procedures is a relatively simple and low-cost remedy to introduce to reduce or remove this barrier to raising a complaint.⁵

We also believe that it could reduce other barriers to pet owners complaining, such as not believing it would be successful (the most common barrier), the process being too long or complicated, or just not having a way to take action that they feel comfortable to use.

⁵ Which (2025) - Complaints and redress in veterinary services, accessed at: <https://www.which.co.uk/policy-and-insight/article/complaints-and-redress-in-veterinary-services-a5z611X9tZzf>

Remedy 14 would help ensure a minimum basic standard for complaints handling, that there is some consistency across different practices, and that pet owners have a clear idea of what to expect when they raise a complaint, which we think would increase the confidence of pet owners to raise a complaint when they experience a problem.

[Our research also found that 31% of pet owners who complained were dissatisfied with how their practice handled the complaint.](#) We believe that as well as reducing barriers to complaining, remedy 14 could increase satisfaction with in-house complaints handling, again by requiring minimum standards and setting clear expectations for the process. Among those who were dissatisfied with their practice's response, the vast majority did not take their complaint any further. 59% said they did not do so because they didn't think they would get anywhere, and 36% did not know how. Therefore we would support the inclusion of a requirement to signpost escalation options for pet owners if they are not satisfied with the outcome of their complaint.

In terms of the risks and costs associated with implementing this remedy, we do not think this would be excessively burdensome for veterinary businesses, whether they are large groups or small independent practices. However, we do agree that the creation of a template complaints policy for veterinary businesses to use would mitigate some of the upfront time burden for businesses. A template could also help to promote best practice and consistency between different businesses, ultimately benefitting consumers and creating a consistent basic standard for veterinary businesses to uphold.

- *Remedy 15: A requirement for all veterinary businesses operating FOPs to engage in mediation in good faith in cases where the pet owner's complaint is not resolved in-house and the pet owner wishes to engage in mediation.*

As per the recommendations in our paper on complaints and redress in veterinary services,⁶ we support the introduction of mandatory ADR to improve access to redress in this sector. We have been ambivalent about whether mediation specifically should be mandatory, as we see this as dependent on the broader redress landscape and what other channels might be available, with our preference being that pet owners have access to adjudication through an Ombudsman scheme.

We have no arguments against mandatory mediation in principle though, and acknowledge the benefits that mediation can deliver for pet owners, including:

- Seeking to resolve complaints amicably without legal proceedings. A vet is not a one-off service, and pet owners may wish to return to the practice they have complained about, and so there is an obvious benefit to resolving the case in an amicable way. In fact, one of the most common barriers to pet owners complaining according to our research is that they were concerned about 'falling out' with their practice.

⁶ Which (2025) - Complaints and redress in veterinary services, access at: <https://www.which.co.uk/policy-and-insight/article/complaints-and-redress-in-veterinary-services-a5z611X9tZzf#discussion-and-recommendations>

- Opening lines of communication between a pet owner and veterinary practice in what might be a highly emotionally charged incident.
- Flexibility around what a good resolution looks like. In some cases, an apology or explanation is as important, or more important, to a pet owner than financial redress. Mediation could help to facilitate such resolutions, even in cases where adjudication would likely not rule in favour of the pet owner.

Although this is contingent on regulatory reform, **we would also like to stress that we strongly support the introduction of a form of binding adjudication alongside mediation.** Having conducted in-depth interviews with pet owners with particularly complex and serious complaints as part of our research, we are of the view that there is an outstanding need here that would not be filled by mandatory mediation as a sole private redress scheme. This is because in some cases an amicable resolution through mediation may be extremely difficult to achieve or simply not a desirable option for the pet owner/s.

For example, we spoke to several pet owners whose complaint was predicated on their belief that a vet or vet practice acted negligently, resulting in the injury or death of a cherished pet. In these cases, it was important to the pet owners that their case would be actively investigated, and that this investigation would result in an independent judgement. By its nature, mediation facilitates the agreement of a resolution to the complaint between involved parties, but cannot itself form an independent and binding decision. This is the kind of case where we would foresee adjudication fulfilling a currently unmet need. Whilst the number of cases requiring this may be relatively small, they may put consumers at risk of severe emotional and/or financial harm, which an independent and binding adjudication process could protect them from.

There are examples in other sectors of mediation existing alongside a binding process of adjudication and arbitration. For example, the Parliamentary and Health Service Ombudsman includes reference to considering mediation in its information on how they deal with complaints, and The Motor Ombudsman offers mediation as a first step to resolve a complaint, progressing the case to adjudication if it is not resolved by mediation.^{7 8}

- *Remedy 16a: An undertaking from (or requirement on) the RCVS to develop and publicise a decision tree to help pet owners navigate the different routes to obtaining redress.*

We agree that there is a role for the RCVS in providing information to improve consumer awareness and understanding of routes to redress. Whilst we have no strong view as to the exact form this should take, it should in the very least:

- Be easily findable and accessible: beyond being available on the RCVS website for consumers to search and find themselves, practices should signpost this information

⁷ Parliamentary and Health Service Ombudsman - How we deal with complaints, accessed at: <https://www.ombudsman.org.uk/making-complaint/how-we-deal-complaints>

⁸ The Motor Ombudsman (2021) - What is mediation? Accessed at: <https://www.themotorombudsman.org/knowledge/what-is-mediation/>

as part of their own complaints process, and inform pet owners of its contents if they cannot access it themselves, for example if they are digitally excluded.

- Offer explainers about the nature of available routes for obtaining redress as well as the existence of these routes, so that pet owners can make an informed decision about the best one for them to pursue.
- Set out expectations for different stages, for example the maximum timelines for response that practices must meet.

As an existing source of consumer advice, Which? will also play its role in communicating these options, including updating our [existing advice page](#) with changes arising from the Market Investigation,⁹ and seeking to advise consumers proactively of changes to the redress system as they are implemented.

- *Remedy 16b: An undertaking from (or requirement on) the RCVS to collect, analyse and publish on an annual basis data and insights on complaints in the veterinary market for household pets.*

We are supportive of remedy 16b regarding the RCVS collecting, analysing and publishing complaints data on an annual basis. Complaints data should be used wherever possible to inform efforts to drive improvements in the sector, picking up on any trends and common issues resulting in complaints. This is especially important for the veterinary sector at this time. When changes resulting from the CMA's Market Investigation are brought into effect, and probable regulatory reform is underway, it will be particularly important that consumers' experiences are considered and used to inform and evaluate these changes.

Recommendation for future regulatory reform

- *Remedy 17: A recommendation to the UK government, in consultation with the Scottish Government, Welsh Government and Northern Ireland Executive as appropriate, to establish a replacement statutory regime for the regulation of veterinary services for household pets.*

We welcome the recommendation to the UK government to establish a replacement statutory regime for regulating veterinary services, and feel that this matter should be taken forward as a matter of urgency. We agree with the CMA's assessment that the current regulatory regime is not fit for purpose and are also aligned with many of the CMA's recommended inclusions in a replacement regime. Specific priorities for regulatory reform from our point of view are as follows:

Regulation of veterinary businesses

⁹ Which? (2025) - I'm unhappy with my vet, what are my rights?, accessed at: <https://www.which.co.uk/consumer-rights/advice/i-m-unhappy-with-my-vet-what-are-my-rights-a73oY4o7d4ga>

Firstly, we agree that **business level regulation**, in addition to the professional level regulation that already exists, is an essential part of an updated regulatory regime. The shift from majority independent vets owned by veterinary surgeons themselves to the majority of practices being part of larger corporate groups means that regulation at the individual professional level only is no longer appropriate. Many policies and procedures that have a direct impact on consumers, like pricing or the information provided to new customers, will be determined at the business level and as such the business should be accountable for them. It was apparent from our research that when a consumer experiences a problem with their vet, the complaint is usually dealt with at a practice level anyway, often by a practice manager, rather than the individual professional who treated the pet.

Whilst a range of remedies can and should be introduced directly by the CMA through a CMA Order in the first instance, we agree that it is simpler and more efficient in the longer term for these standards to be included in an updated regulatory regime whereby they are monitored and enforced by a veterinary regulator.

Monitoring and enforcement powers for the regulator

We firmly agree that the enforcement powers currently held by the RCVS are too narrow, and that a replacement regulatory regime should allow for a broadening of their powers to monitor compliance with regulation, and their powers to take action when businesses or individual professionals are not compliant.

Specifically, we agree that the threshold for regulatory action should be lowered and that, complimentary to this, the investigative powers and range of sanctions available to the regulator should be widened. It was a recurring theme in our complaints and redress research that the RCVS threshold for investigating complaints is extremely high, to the point that it is very rare for an individual consumer's complaint to reach it, even if there is an allegation of severe negligence.¹⁰ Notably, one pet owner in our research initially had her serious complaint dismissed by the RCVS, only for the veterinary professional in question to later be struck off for inadequate provision of care to 18 different animals.¹¹ This being said, there will also undoubtedly be cases where removal of a veterinary professional from the register is not an appropriate action for the regulator to take. It is essential that a refreshed regulatory framework allows for a range of sanctions that can be applied as appropriate given the severity of an individual case of non-compliance. For example, they could still suspend or remove professionals from the register in serious cases of misconduct, but they might instead choose to fine a veterinary business or formally warn a veterinary professional for a less serious breach of regulatory rules. We anticipate that this

¹⁰ Which (2025) - Complaints and redress in veterinary services, access at: <https://www.which.co.uk/policy-and-insight/article/complaints-and-redress-in-veterinary-services-a5z611X9tZzf#discussion-and-recommendations>

¹¹ RCVS - Disciplinary Committee hearings - <https://www.rcvs.org.uk/concerns/disciplinary-hearings/>

would be a more effective way to support and encourage compliance with regulation, ultimately driving higher standards across the sector as a whole.

Effective channels for complaints and redress

We have already outlined our view on complaints and redress in our responses to remedies 14-16. However, we note here that we agree that these remedies should be incorporated into the requirements set out by a replacement regulatory regime which requires minimum standards for complaints handling by veterinary businesses, and makes provisions for the escalation of complaints not resolved at a practice level.

As described in our response to remedy 15, we strongly believe that adjudication is a necessary element of an effective redress landscape in this sector, and our preference is that this takes the form of an Ombudsman with the powers to actively investigate and make binding judgements on cases brought to them.

We acknowledge some of the concerns of other organisations about such a scheme, such as that it would be lengthy, stressful for the veterinary professional, and may encourage frivolous or financially motivated complaints. However, we counter that an Ombudsman scheme working well should do the opposite: it could provide final and binding judgements on cases that under the current system are inappropriately deferred to the RCVS in the absence of other effective complaints channels, and may go on for months or even years. Furthermore, given that an Ombudsman makes an independent judgement based on both sides of a case, we would expect it to find in favour of a veterinary business or professional in the event of frivolous or solely financially motivated complaints, and so we would not expect the existence of an Ombudsman to lead to an increase of such complaints. In any case, it is not reasonable that pet owners as a whole should be deprived of effective redress channels in order to reduce the risk of frivolous complaints.

Regulation in the consumer interest

We would be supportive of the introduction of statutory consumer duties for the veterinary regulator. We are of the view that there is insufficient focus on the consumer interest under current regulations compared to the focus that is given to animal health and welfare. This is undoubtedly driven in part by the fundamental issues described above with the current regulatory regime. However, as demonstrated by our research on redress, there was a perception among pet owners who had contact with the RCVS through raising a complaint that it did not prioritise supporting pet owners, but instead served to protect the veterinary profession. A consumer duty could help to ensure that there is sufficient focus given to the consumer interest alongside the regulator's other priorities. This in turn could help build public trust in the regulator.

Whilst we do not have a strong view on the exact structure of a replacement regulatory regime, we would like to emphasise the importance of ensuring that its regulatory functions are free from conflicts of interest with those related to professional leadership. As stated above, there is already a perception of a lack of independence among pet owners who have engaged with the RCVS, and this should be taken into consideration in determining the structure of a replacement regime. If professional leadership and regulatory functions continue to coexist in a single in an updated regulatory regime then it will be important that their operational independence is communicated to pet owners so they can have confidence and trust in the way veterinary services are regulated.

About Which?

Which? is the UK's consumer champion, here to make life simpler, fairer and safer for everyone. Our research gets to the heart of consumer issues, our advice is impartial, and our rigorous product tests lead to expert recommendations. We're the independent consumer voice that works with politicians and lawmakers, investigates, holds businesses to account and makes change happen. As an organisation we're not for profit and all for making consumers more powerful.

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