



Promoting animal health and welfare by  
assuring the safety, quality and efficacy of  
veterinary medicines



# Veterinary Medicines Directorate

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## **VMD response to the CMAs preliminary decision in its market investigation into veterinary services for household pets in the UK**

We support the CMA's aim that animal owners should pay a fair price when obtaining treatment from a vet practice.

We support the CMA's aim that there is suitable competition to allow animal owners to find a vet practice that best suits their needs.

We urge the CMA to ensure that any proposed changes would not lead to unintended consequences that impact on animal welfare. Veterinary practices are private businesses, and the supply chain can be quite complex. Any suggested changes will impact that chain. It's vital that those impacts are understood before changes are recommended or mandated.

We understand why the CMA investigation has solely focused on the companion animal sector. However, if any orders are only mandated for the companion animal sector, then that is likely to increase regulatory burden, which is against the Government's aims to reduce regulatory burden by 25% during this Parliament. We risk having a different regulatory system for companion animals compared to food-producing animals. There are a significant number of mixed practices who will be required to follow a different regulatory framework from one consult to the next depending on the type of animal they're treating.

Changes to the way that veterinary practices are required to provide pricing guidance must also comply with the Veterinary Medicines Regulations 2013 (as amended) advertising regulations. We support the principle that animal owners should be made more aware of the costs of treatments and operations. But that must be aligned with the regulations currently in place and not lead to any unintended advertising or promotion of one product over another. It is vital that vets are free to prescribe the right product for an animal based on the case they are managing and that animal's needs, not because of pressure from any other source to prescribe the cheapest medicine possible.

We suggest that the term "online pharmacy" is replaced with "online veterinary medicines retailer" or simply "online retailer". Pharmacy is a protected term controlled by GPhC. Not all online veterinary medicines retailers are also registered pharmacies; therefore, this terminology may lead to some confusion.

We support the need to reform the Veterinary Surgeons Act and agree that this vital piece of legislation needs to be updated to better reflect the current veterinary sector. It is important to note that all registered veterinary practices are regulated in some way. If they are part of the RCVS Practice Standards Scheme, then through the RCVS assessment process. However, if they are not part of the Practice Standards Scheme then they are inspected by

the VMD to ensure they comply with the requirements of the Veterinary Medicines Regulations 2013 (as amended), as well as checking that they comply with the regulatory requirements regarding controlled drugs.

We would like to note that the price control measures being proposed are limited to certain activities such as a cap on the cost for a written prescription. If a vet practice sees its profits impacted, there is a risk that a practice will introduce or increase costs in other areas, such as charging for consultations up front which may cause people to be hesitant to seek veterinary help.

One of the proposed remedies will require that all pet owners are given a written prescription for on-going treatments. There is a risk that this provision will increase the cases of prescription misuse. We have guidance to reduce the risk of prescription misuse, including the ability for prescribers to email the prescription directly to the pet owner's online supplier of choice. If this ability is removed, it may increase the risk of pet owners using the same prescription at multiple retailers.

Is there also a risk that by making costs more transparent, it allows for competitors to undercut their competition. In which case, is there a risk that the greater buying power and control held by the large vet corporations may be able to put pressure on the independent practices which may result in less competition in future if those businesses no longer have an incentive to operate?