

Competition and Markets Authority
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Consumer research response

Which? response to the CMA's consumer research report on consumer reactions to some of the consumer facing remedies.

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Summary

Which? welcomes the CMA's research exploring the consumer view on potential remedies in the veterinary sector. The evidence indicates there are considerable demand-side weaknesses in the veterinary market so it is important to the successful implementation of these interventions that consumer reactions are heard and considered in their design. This is particularly the case for those consumer facing interventions that will directly affect the experience of pet owners when choosing and using veterinary services.

The overall reaction of consumers in the research is encouraging, with many of the remedies garnering support, and we set out some comments on the findings for specific remedies below.

Ownership transparency

The research findings echo previous evidence from the CMA and Which? that many pet owners either mistakenly believe their practice is independent or only realise it is part of a larger group after joining. This matters because the research also shows that ownership can influence consumer choice for at least some pet owners. We therefore reiterate points made in our previous evidence that the effectiveness of the ownership transparency remedy will depend on **ownership being displayed prominently and consistently at the point where pet owners are choosing a First Opinion Practice (FOP)**. If ownership information is not widely noticed or understood at that stage, the impact of this remedy will be diluted.

Vet customer satisfaction survey

We note that some consumer responses to the proposed group-level satisfaction survey were more muted, although the research also indicates that many pet owners see potential value in such information to help them make better judgements about quality and to create

incentives for groups to improve standards. This broadly aligns with our own response to this remedy, which is that while we see value in a group-level survey (indeed we conduct our own survey on this market), the design and publication of the survey will need to be carefully considered by the CMA and RCVS to ensure it addresses consumer concerns and delivers the greatest benefit.

We also note that, at present, it is difficult to assess how powerful this remedy could be because the widespread lack of awareness of practice ownership means consumers will have little sense of brand reputation at a group level. Pet owners may be more likely to seek out and use information about group performance if there is greater ownership transparency. Therefore, this remedy also goes hand-in-hand with the ownership remedy: if measures are being taken to improve awareness of ownership, there should be means for pet owners to assess what that ownership means for service and quality of care.

Price lists and written price estimates

The consumer research shows widespread support for mandatory pricing information. We note that where concerns do exist, they tend to be around the lack of usefulness or accuracy in emergency or complex treatment situations. These reactions reinforce our belief that the CMA has undertaken a robust process to establish what should be included in the list, since the proposed inclusions set out in the provisional decision strike an appropriate balance between considering the needs of consumers and the potential burden on businesses.

Comparison website

Given the evidence that both the CMA and Which? have previously found that pet owners are concerned about the lack of transparency in this market, we are unsurprised that the majority of research participants could see benefits from a comparison website.

We acknowledge some of the reservations among consumers around this remedy, including that quality is not considered and that many might not shop around in practice. However, while many pet owners prioritise quality over price, pricing information has historically been very difficult to access, making it hard to predict how greater transparency might affect competition at a market level. A comparison tool would help consumers make practical use of newly available pricing information.

Further, we support the CMA's proposal that the RCVS develops a process and functionality for making the data collected for Find a Vet accessible to selected third parties. We anticipate that competition in the provision of comparison tools will ultimately lead to greater innovation including these tools providing a wider range of useful information such as quality measures.

Written price information

Evidence from the CMA and Which? highlights the lack of clarity pet owners have about how much treatments will cost, with many only discovering the overall price at a late stage. Whilst the remedy on mandatory pricing information will go a long way to increasing clarity around pricing, standard price lists are not tailored to individuals and so have limitations in situations

where there are multiple treatments combined together or multiple treatment pathway options. Therefore we believe that written price estimates and standard price lists serve complementary functions that in combination address many of the issues raised by consumers. Price lists provide baseline transparency for a standard set of services, while written estimates can support informed decision making with estimates that are tailored to individual situations.

The research highlights mixed views on the proposed £500 threshold for written price information. Some had concerns that it could increase consultation times and fees, whilst others feel that the suggested threshold is too high. These mixed findings reaffirm our opinion that the £500 threshold strikes a reasonable balance of capturing higher cost treatment pathways without overburdening practices and pet owners with written estimates for every treatment.

Default prescriptions

We note that research participants expressed less support for default prescription measures than for other remedies, but we would caution against over-interpreting this. [The impact of inertia on consumer behaviour is well-documented, as is the tendency to underestimate its impact.](#) This being considered, it is not unexpected that consumers are less enthusiastic about a default based remedy like this. Given the evidence shows pet owners consider veterinary medications to be very expensive, but paradoxically lack awareness of or motivation to explore cheaper sources, we strongly support measures targeted at opening up the medicines market. Even if consumers do not endorse remedies such as default prescriptions in the abstract, such measures can still play an important role in reducing friction and encouraging engagement with alternative options.

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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