

VETERINARY SERVICES FOR HOUSEHOLD PETS MARKET INVESTIGATION

Summary of the Competition and Markets Authority (CMA) hearing with VetPartners held on 2 December 2025

Introductory remarks

1. VetPartners thanked the CMA for the opportunity to have this discussion.
2. VetPartners said that it was concerned about the Large Veterinary Group (LVG) versus independent narrative arising from the market investigation and wanted to use the hearing to focus on those provisional remedies which it considered would burden its staff and have potential unintended consequences for pet owners and pets. It also wanted to highlight some of the proposed remedies which had practical considerations e.g. those relating to Practice Management Systems (PMS) and also the prescription price cap.

Use of evidence in the Provisional Decision Report (PDR)

3. VetPartners said the CMA's evidence rested on three principal areas: the survey, econometric analysis and profitability evidence. It noted that the CMA had a low overall response rate to its consumer survey and said that this was relatively fragile evidence on which to base the theories of harm. It added that the econometric work raised methodological concerns. On profitability, it said profits were not widespread or sustained and suggested that variation over time was probably more indicative of a well-functioning market.
4. VetPartners did not disagree with the features the CMA had identified in the market but was concerned with what it deemed to be the more onerous remedies. It agreed that there was a need for transparency of ownership and pricing but stated that this did not necessarily demonstrate that there was a lack of competition or that the market was not working well. VetPartners said competition largely occurred on quality of the vet team. VetPartners added that it was seeking to improve how it communicated prices to pet owners, including further educating its teams to provide estimates and guidance to clients around possible cost outcomes. It noted that it was easier if clients indicated their budget, but some pet owners seek treatment without wanting to discuss the cost.

5. VetPartners said that the accessibility of price information had improved since the start of the market investigation. Consumers typically selected a veterinary practice as a result of dialogue with other pet owners who were often aware of the practices offering higher quality services.

LVGs comparison to independents in the PDR

6. VetPartners said that there was huge variety in the ownership models amongst the LVGs as well as in the market as a whole. It noted that not all LVG practices were more expensive than independents and there was no basis for suggesting that LVGs were any more commercialised than the independent practices that had joined VetPartners. VetPartners said that it did monitor its businesses using KPIs as this was sensible business practice but that it did not use improper financial incentives. They said that VetPartners did not impose prices upon its practices and instead worked with them to determine prices which both parties agreed were proportionate and appropriate.
7. VetPartners highlighted heterogeneity across the market and said national averages of prices risked mischaracterising local realities and that pet owners made decisions based on what was available to them locally. It submitted that its practices varied in service offering and price and said its analysis illustrated that both LVGs and independents spanned wide price ranges locally. VetPartners was concerned about the presentation of price in the PDR indicating that independents were 16 per cent cheaper than LVGs as this might give consumers the wrong impression that they would save money by simply switching from an LVG to an independent.

Assessment of quality

8. VetPartners said that quality was multifaceted and that many of those facets were observable, but it did not think the CMA in its PDR interpreted quality metrics accurately. It said that investment in vets, nurses and support teams contributed directly to quality and so VetPartners made an effort to attract and retain staff. It also said that, among other improvements, it often improved employee benefits post-acquisition, because its number one measure of quality was the ability to attract and retain its teams. VetPartners believed that vet to nurse ratios strongly impacted on clinical quality. VetPartners told us it was difficult to replace an experienced vet, who owned a practice and had sold it as part of a retirement plan, with a similarly experienced vet.

VetPartners ensured that a price list containing the shoppables was displayed in the waiting room.

9. VetPartners considered that coping with industry-wide staffing shocks would be easier for smaller owner-manager practices (who would work the hours needed to keep the business going) than for LVGs or a large multi-site practice.
10. VetPartners explained that investments across its practices were aimed at improving patient care and client experience.
11. VetPartners said that its capital expenditure was ongoing across development and maintenance projects. It also noted that smaller investments in the practices it had acquired, such as in new equipment, made a real difference to patient care.
12. VetPartners also pointed to Practice Standards Scheme (**PSS**) participation as a quality indicator and said LVGs had higher PSS membership rates than non-LVGs. VetPartners said that quality improvements were pursued across its estate, including standard training and enrolment in PSS.
13. VetPartners was slightly concerned that the CMA did not see PSS as a good quality measure and one which could be improved. It thought that if the CMA and the Royal College of Veterinary Surgeons (**RCVS**) played a role in making consumers more aware of the PSS then this would encourage more practices to participate in the scheme. It also considered that Net Promoter Scores (NPS) and Google reviews were relatively useful indicators of quality at a local level.

Remedies principles

14. VetPartners said remedies should be clear, practical, fair and proportionate, applicable across all types of business model (including single-site practices with non-clinical owners), and future-proofed. It highlighted the importance of PMS when considering the feasibility of the proposed remedies. It suggested practical display options (for example, rotating screens in waiting rooms where information volumes were high).

Written estimate remedy

15. VetPartners understood that the CMA was trying to avoid large unforeseen bills for pet owners at the end of a course of treatment and that this was a matter VetPartners took seriously. However, it said the vast majority of vets already provided estimates, particularly for higher-value items and believed that written estimates should be meaningful and workable. VetPartners considered that it would be particularly onerous if vets were required to prepare an estimate for the total course of treatment including a very long list of possibilities.
16. VetPartners said that based on its analysis the proposed £500 threshold (i.e. the point at which a written estimate would be required) could affect 55 per cent of consultations rather than the 20 per cent specified in the PDR. Further, VetPartners believed that using the benchmark of 20 per cent of cases, the threshold would increase to at least £1,400. VetPartners suggested the concept of estimating the “next treatment step” as a more workable approach than attempting to estimate the entire course of treatment at first consult, given clinical uncertainty and wide outcome ranges.
17. VetPartners told the CMA that written ranges could be helpful but said that PMS did not consistently support ranges or free-text in estimates. VetPartners nevertheless agreed with the CMA’s aim of avoiding unforeseen large bills and said a collaborative group of practising vets from across the sector could help design workable estimates and price-list categories.

Pet owner survey remedy

18. VetPartners said the proposed national pet owner satisfaction survey risked obscuring local competition and submitted that the use of local measures such as NPS and Google would be more meaningful. VetPartners used a third-party provider linked to its PMS to issue a survey question after each consultation and said response volumes and rates were high. Its NPS and Google Reviews were published on its website, and it noted that reducing the number of questions had resulted in more feedback from clients. VetPartners acknowledged the risk of “gaming” and suggested that a mandated methodology, third party administration and inclusion of all consults could mitigate that risk.

Prescription price cap remedy

19. VetPartners believed that the proposed prescription price cap was disproportionate because the transparency remedies would encourage more consumers to shop online (which was a trend they already recognised in the market). In addition, VetPartners did not see evidence that groups or practices were inflating prescription fees. VetPartners was concerned that the price cap would discourage investments and force practices to recover costs in other ways. Some of the proposed requirements around prescription duration were also of a concern and it thought this decision must remain at the vet's discretion. VetPartners added that if the proposed remedy were implemented it should be subject to a sunset clause.
20. VetPartners said the proposed cap level was too low, did not account for the true costs of providing the service (particularly for complex cases), did not take into account when more than one medication was required on a single prescription and could have unintended effects, such as shifting cost recovery to other fees.

Prescription awareness remedy

21. VetPartners repeated that there had been significant growth in online medicine sales. It considered some of the statements around potential savings regarding online versus bricks and mortar medicine sales were slightly misleading because savings were not significant in all cases and in some cases were clinically inappropriate, for example, some online pharmacies may decide not to sell insulin because they cannot guarantee cold chain, but other online pharmacies may decide that they can guarantee this.
22. VetPartners said that medicines were available to purchase online from a range of providers, not only LVG-owned pharmacies. VetPartners asked that any RCVS listing of online pharmacies be designed in a way which did not inadvertently point pet owners to certain pharmacies over others e.g. those which came first in the alphabet. An alternative proposal would be to ensure pet owners were aware that they could source medicines online at key touchpoints. VetPartners considered that it should not be the responsibility of the vet practice to quantify and communicate the savings that could be made by purchasing medicines online as this would mean every practice would need to keep up to date with the prices available online.

23. VetPartners thought that it might be possible to source medication from high street pharmacies in future. It said that practices should encourage digital prescriptions and where appropriate send them directly to the pharmacy chosen by the pet owner to reduce the risk of fraud.

Written prescriptions and ongoing medication information remedies

24. VetPartners said some clients preferred a paper prescription but noted that it was not practical to write four or five prescriptions at the end of a consult and PMS systems were currently not designed well enough to make the process sufficiently efficient. These would be completed at the end of the session, or a vet could ask a nurse to prepare these for the vet to check and sign later.
25. VetPartners supported digital prescriptions and said 48 hours was a reasonable timeline for issuing these, particularly for repeat items. If a pet required acute medication the vet would try and deal with that immediately.
26. VetPartners was supportive of giving pet owners a chance to choose whether their default for repeat prescriptions is a written prescription or medication dispensed in-clinic in principle but thought that proactively requesting default preferences would create a great deal of work, require updates to PMS systems and would not be helpful because pet owners would, in any event, be asked in the practice. It supported informing pet owners of the option to request written prescriptions at key touchpoints (registration, dispensing, and repeat requests) rather than defaulting to written prescriptions for all.

Price list remedy and Find a Vet remedy

27. VetPartners supported online price lists but said appropriate category design and the accompanying narrative were critical to meaningful comparisons. It thought that input from a working group of vets would be helpful. VetPartners believed that while the RCVS would understand that it was important to display relevant and consistent narratives alongside price, price comparison sites would be less inclined to do so. Just comparing prices would not be helpful for clients.

Cremations remedies

28. VetPartners thought that the publication of prices for all individual cremations and add-ons would provide the pet owner with an extremely confusing long list of potential options, suggesting it would have 100 items on this list.
29. VetPartners recommended an approach whereby practices could offer reflection time via the euthanasia consent form and pet owners could then choose to opt out, recognising that many pet owners sought prompt closure.

Closing remarks

30. VetPartners said it welcomed clearer national branding of group affiliation and greater visibility of complaints at group level, subject to maintaining local autonomy and diverse service offerings. It repeated the value that, in its opinion, PSS offered as an indicator of quality. It stated that the time to implement the proposed remedies was relatively short. It believed that there needed to be clear separation between the professional leadership and the regulatory function within the RCVS, while cautioning against full institutional separation on cost and capacity grounds. VetPartners said industry funding for business regulation should apply to veterinary businesses rather than borne by individual vets via their professional fees.
31. VetPartners concluded by reiterating support for the proposed remedies which improved client experience and patient outcomes and said implementation details should be worked through with the profession to avoid undue burdens on clinical and front-of-house teams.