

## **VETERINARY SERVICES FOR HOUSEHOLD PETS MARKET INVESTIGATION**

### **Summary of the Competition and Markets Authority (CMA) hearing with the Royal College of Veterinary Surgeons (RCVS) held on 26 November 2025**

#### ***Introduction***

1. The RCVS noted the opportunity to meet the Group, the progress made by the investigation and that, at the time of the hearing, similar competition issues were being examined in other European countries.
2. The RCVS stated its willingness to continue working with the CMA and noted the complexity of implementing the proposed changes.
3. The RCVS said that it considered that there were challenges regarding the scope of the market investigation and consumer expectations and in relation to the impact on the sustainability of veterinary services, particularly in remote and rural areas.
4. The RCVS noted that a lot of people were happy with their veterinary services but agreed that change was needed with regards to veterinary businesses. It said that it was supportive of most of the proposed remedies but noted some reservations with regards to the pet health plan comparison tool and pricing comparisons as well as with remedies which directed clients to online pharmacies.
5. The RCVS welcomed the proposal to provide smaller veterinary businesses with a longer implementation period and noted the large number and complexity of activities proposed by the CMA and the need therefore to guard against anything which won't have a direct impact.
6. The RCVS stated that its role as a Royal College which regulates was a cost-effective model.

## ***Amendments to the RCVS Codes and Guidance***

### ***Remedy 5a: Written estimates for higher cost treatment options and remedy 5b: Itemised billing***

7. The RCVS broadly supported the provisional requirements on veterinary businesses to provide written estimates and itemised bills.
8. The RCVS confirmed that providing itemised bills was already a requirement for vets and therefore incorporating requirements from any CMA Order did not present significant issues.
9. The RCVS indicated that for some proposed CMA requirements consideration would need to be given to what these might mean for veterinary professionals working in sectors outside of the scope of the market investigation and whether the RCVS Code and Guidance should be amended. Practical challenges were also noted, for example, for farm and equine practices with regards to providing written estimates.
10. The RCVS expressed disappointment that there was not more focus on the role of a senior appointed vet as a linchpin between the regulation of veterinary businesses and the requirements on individuals.

### ***Specific activities for the RCVS***

11. The RCVS noted that in its written response to the Provisional Decision Report (PDR) it had expressed agreement with remedies 4, 7, 16a and 16b.

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

12. The RCVS requested some flexibility regarding the survey design and implementation, noting challenges relating to response rates in particular. The RCVS also sought clarification on whether large veterinary groups should publish survey results on their own websites or link to the RCVS website.

### ***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 First Opinion Practice (FOP)***

13. The RCVS said that it already produced advice for pet owners and was open to expanding this to include information about online pharmacies and the process for obtaining written prescriptions and ordering prescriptions. The

RCVS stated that it favoured digital content and downloadable materials to minimise costs and environmental impact.

14. The RCVS sought clarity around the information that vets were expected to relay during consultations around prices of medicines available from online pharmacies and availability of prescriptions.
15. The RCVS expressed its willingness to work with the CMA and Veterinary Medicines Directorate (VMD) to produce literature, subject to sufficient resources. The RCVS noted that it would be happy to host a link to the VMD's list of approved online pharmacies on its website. The RCVS raised concerns about the potential for increased prescription fraud if written prescriptions become more common.
16. The RCVS noted the areas for which the VMD has responsibility, rather than the RCVS, including maintaining a register of approved online pharmacies and the Veterinary Medicines Regulations (VMRs).

*Remedies 16a and 16b: Decision tree and analysis and publication of complaint data*

17. The RCVS stated that it would like to work with the Veterinary Client Mediation Service (VCMS) to deliver these remedies. It also noted that practices might have concerns about sharing complaints data with the regulator.

*Enhanced Find a Vet and CRM*

18. The RCVS outlined the data that could be added to Find a Vet and noted the information that was already present on the platform. It said that it was mindful of safeguarding concerns when linking individual professionals to practices.
19. The RCVS explained that initial data entry would be manually completed by veterinary practices, with plans to automate processes over time, including via bulk uploads.
20. The RCVS cautioned about information overload for pet owners caused by all the additional information proposed for display on Find a Vet and in relation to this said that front end design would be very important.
21. The RCVS noted the variability of pet care plans, including length and what was included. It cautioned against stifling innovation and implementing costly remedies and suggested that there could not be a standardised and consistent method of setting out what pet health care plans include and their value to pet owners. The RCVS outlined the challenges of creating bespoke pet care plan calculators.

22. The RCVS said that it was enhancing its Find a Vet platform in line with new website design and improving data collection and accessibility through the customer relationship management system which would provide the foundation for additional information to be displayed on Find a Vet.

#### *Data sharing with approved third parties*

23. The RCVS said that it supported data sharing with approved third parties, including government agencies and researchers. The RCVS said it was happy to develop approval criteria and processes for data requests and had been carefully considering a range of other technical aspects.

#### *The RCVS as a monitoring body*

24. The RCVS said that it was willing to act as a monitoring body for the implementation of the relevant proposed CMA remedies, noting that further detailed discussions would be needed on the exact form monitoring would take and associated impacts on resourcing and costs.
25. The RCVS suggested leveraging its existing Practice Standards Scheme (PSS), including a range of different monitoring techniques (such as annual attestations and a percentage of spot checks) and the risk and escalation process the RCVS is developing, to monitor CMA remedies in a cost-effective manner. The RCVS noted the potential for a senior appointed vet in FOPs to deliver accountability and support monitoring. It also noted that it would consider how practices not currently involved in the PSS would be monitored.
26. The RCVS said that it considered that there was likely to be a rise in complaints about veterinary practices, not an area of compliant that came under the RCVS's statutory jurisdiction, and that it was looking at structures to handle these.

#### ***Governance reform***

27. The RCVS said that it was engaged in discussions with the Department for Environment, Food and Rural Affairs (Defra) about governance reform. While it was supportive of many of the CMA's provisional recommendations, the RCVS was keen to preserve the benefits of a Royal College that regulates, stating that the current integrated model was cost-effective and coherent and that there was no conflict between its functions.

### ***Consumer and competition duty***

28. The RCVS said, in relation to a proposed consumer and competition duty for the regulator, that animal health and welfare should take precedence in case of conflict. The RCVS requested further discussions with the CMA on how this duty might look on a day-to-day basis and how it would interact with existing responsibilities.

### ***Complaints and redress***

29. The RCVS said that it was broadly supportive of the proposed complaints and redress remedies, including the role of the VCMS. The RCVS raised a concern about the potential for disproportionate caseloads from low-value complaints and vexatious complaints and suggested that improved guidance and communication could help manage expectations and streamline processes.

### ***Next steps***

#### *Funding to allow preparation*

30. The RCVS highlighted the need for clarity on funding to support preparatory work before any CMA Order is in place.

#### *Undertakings*

31. With regards to its own activities, the RCVS expressed its willingness to offer undertakings and requested a further discussion on the process and implications.

#### *Remedy review process*

32. The RCVS raised the need to gather baseline data and have a clear review process to assess the effectiveness of remedies over time and sought to collaborate with the CMA on this.

#### *Taskforce*

33. Both the RCVS and CMA agreed on the value of an implementation taskforce to coordinate workstreams, address operational details, and ensure timely progress.

*Impact of the market investigation*

34. The RCVS noted that the investigation itself had already influenced behaviour in the sector. The organisation stressed the need for careful communication and management of expectations.