

VETERINARY SERVICES FOR HOUSEHOLD PETS MARKET INVESTIGATION

DRAFT ORDER – CONSULTATION

The Veterinary Services Market Investigation (Funding) Order 2026

Background

1. On 23 May 2024, following a market review launched on 7 September 2023 and a consultation opened on 12 March 2024, the Competition and Markets Authority (the **CMA**), in exercise of its powers under sections 131 and 133 of the Enterprise Act 2002 (the **Act**), made a reference for a market investigation in relation to the supply of Veterinary Services for Household Pets in the United Kingdom.
2. On 23 May 2024, the CMA appointed from its panel a group of five independent members (the **Group**) to conduct the market investigation and publish a final report. The Group was required to decide whether any feature, or combination of features, of each relevant market prevents, restricts or distorts competition and thereby has an adverse effect on competition (**AEC**) and, if so, what action should be taken.
3. On 24 March 2026, the CMA published its report on the market investigation (the **Final Report**) in which it concluded that there are certain features which have an AEC in the markets for (i) the retail supply of Veterinary Services for Household Pets by first opinion practices (**FOPs**) in the UK, and (ii) the supply of outsourced out of hours (**OOH**) provision to FOPs in the UK.
4. The Group decided that, in order to address the AEC and resulting customer detriment, an integrated package of remedies should be imposed consisting of:
 - (a) Measures to empower Pet Owners when making choices, relating to:
 - (i) transparency of the ownership of Veterinary Businesses;
 - (ii) the ability to compare FOPs directly;
 - (iii) better pricing information when choosing treatments and services;

- (iv) increased awareness of the ability to purchase medicines online and potential savings; and
 - (v) clear information on end-of-life services.
 - (b) Measures to remove barriers to engagement and competition, relating to:
 - (i) ensuring that veterinary surgeons and veterinary nurses are able to act in accordance with the relevant provisions of the Royal College of Veterinary Surgeons (**RCVS**) Code and Guidance;
 - (ii) making it easier for Pet Owners to get and use a written prescription;
 - (iii) improving consumer complaints and redress mechanisms; and
 - (iv) making it easier for FOPs to switch OOH provider.
 - (c) A recommendation to government on reform of the existing statutory regime for the regulation of Veterinary Services.
 - (d) Recommendations to the RCVS and the Veterinary Medicines Directorate (**VMD**).
- 5. Since the publication of the Final Report, two members of the Group have ceased to be members of it. One Group member's appointment to the CMA panel ended on 1 April 2026, and another resigned from the Group on 24 April 2026. Each cessation of membership of the Group, and the Group's continued functioning with its remaining members thereafter, is in accordance with Schedule 4 to the Enterprise and Regulatory Reform Act 2013.
- 6. On 30 June 2026, in accordance with section 165 of, and paragraph 2(1)(a) of Schedule 10 to, the Act, the CMA published a notice of its intention to make an Order as part of a package of remedies to remedy, mitigate or prevent the AEC and any resulting customer detriment, which it had identified in the Final Report.
- 7. The package of remedies will be implemented by:
 - (a) this Veterinary Services Market Investigation (Funding) Order 2026 (the **Order**);

- (b) a separate order imposing substantive requirements on Veterinary Businesses (to be known as ‘the Veterinary Services Market Investigation Order 2026’);
 - (c) the Veterinary Services Market Investigation Royal College of Veterinary Surgeons (Funding) Undertakings 2026;
 - (d) separate undertakings entered into by the RCVS relating to the activities the RCVS will perform and which are described in paragraph 8 below (to be known as ‘the Veterinary Services Market Investigation Royal College of Veterinary Surgeons Undertakings 2026’)¹; and
 - (e) recommendations to government, the RCVS and the VMD as set out in the Final Report.
8. In the Final Report, the Group decided that the costs associated with certain activities to be performed by the RCVS will be funded by a Levy on Veterinary Businesses. These activities include:
- (a) monitoring Veterinary Businesses’ compliance with the Veterinary Services Market Investigation Order 2026 and this Veterinary Services Market Investigation (Funding) Order 2026;
 - (b) improving the functionality of the Find A Vet website;
 - (c) gathering information from Veterinary Businesses to present on the Find A Vet website and operating and maintaining that website on an ongoing basis;
 - (d) contracting with an approved alternative dispute resolution (**ADR**) provider which offers mediation services to relevant Veterinary Businesses operating FOPs and OOH Centres (as defined below);
 - (e) developing and sharing with Veterinary Businesses materials relating to medicines and prescriptions and to help Pet Owners to engage with processes on complaints and redress; and
 - (f) collecting, analysing and publishing on an annual basis data and insights on complaints made by Pet Owners to Veterinary Businesses in the market for Veterinary Services for Household Pets.

¹ Subject to the RCVS offering, and the CMA accepting, suitable undertakings and following the procedure provided for by the Act. In default of the RCVS giving such undertakings, the CMA may instead require the RCVS to perform the relevant activities.

9. This Order, in combination with the Veterinary Services Market Investigation Royal College of Veterinary Surgeons (Funding) Undertakings 2026, will implement the funding mechanism for the levy on Veterinary Businesses.
10. The Explanatory Note accompanying this Order provides an explanation of how the Order is expected to operate.

ORDER

Reference and power

The CMA makes this Order in accordance with the duty imposed by section 138 and in exercise of the powers conferred on it by sections 86 and 87 (as applied by section 164) and section 161(1), (3) and (4) of, and paragraphs 1, 10, 17, 19 and 21 of Schedule 8 to, the Act, for the purpose of remedying, mitigating or preventing the AEC and any resulting customer detriment which the CMA identified in the Final Report.

PART 1

Preliminary

1. Title, commencement and extent

- (1) This Order may be cited as the ‘Veterinary Services Market Investigation (Funding) Order 2026’.
- (2) This Order shall come into force on [specific date to be inserted, which will be the day after this Order is made].
- (3) This Order extends to England and Wales, Scotland and Northern Ireland.

2. Interpretation

(1) In this Order:

‘**Act**’ means the Enterprise Act 2002.

‘**ADR**’ means alternative dispute resolution.

‘**CMA**’ means the Competition and Markets Authority.

‘**Final Report**’ means the final report of the CMA’s market investigation into Veterinary Services for Household Pets in the UK published on 24 March 2026.

‘**First Opinion Practice**’ or ‘**FOP**’ means:

- (a) a site at which primary veterinary care for Household Pets, comprising FOP Services and any OOH FOP Services that are provided by the same Veterinary Business as provides the FOP Services, is offered

(including where the relevant business offers services as a Limited Service Provider); and

- (b) where it does not do so from a site or physical premises, the set of mobile facilities and equipment a Veterinary Business uses to provide primary veterinary care for Household Pets.

‘FOP Services’ means primary care and related services provided in a FOP during normal working hours.

‘Household Pet’ and **‘Pet’** mean an animal such as a dog, a cat, a hamster, a gerbil, a mouse or other rodent, and any exotic animal (but not a farm animal or horse) that is kept for companionship or protection and habitually resides in the Pet Owner’s dwelling.

‘Initial Levy Payment’ means the sum of [c. £400].

‘Initial Relevant Period’ means the period beginning on 24 March 2026 and ending on 31 March 2027.

‘Levy’ means the Initial Levy Payment or the Subsequent Levy Payment, as the case may be, payable in accordance with this Order.

‘Levy Commencement Date’ means the date falling within the Initial Relevant Period on which this Order comes into force.

‘Limited Service Provider’ means a veterinary practice that offers no more than one service to Pet Owners and includes, but is not limited to, providers operating vaccination or neutering clinics, or microchipping.

‘Out-of-hours’ or **‘OOH’** means the period of time outside normal working hours.

‘OOH Centre’ means the site, premises or location at which a Veterinary Business provides OOH Provider Services.

‘OOH FOP Services’ means OOH Services provided in a FOP which are not OOH Provider Services.

‘OOH Provider Services’ means OOH Services provided by a Veterinary Business to a Pet Owner directly or through a subcontracting or outsourcing arrangement with another Veterinary Business, where the provider only provides primary care for Pets outside normal working hours.

‘OOH Services’ means primary care services that are provided outside normal working hours.

‘Pet Owner’ means an individual purchasing Veterinary Services for a Pet under their care (as distinguished from being ‘under care’ with a veterinary professional).

‘Pro-rated Proportion of the Initial Levy Payment’ and **‘Pro-rated Proportion of the Subsequent Levy Payment’** as the case may be, mean one-twelfth of the Levy for each complete calendar month between (i) the date a Qualifying Veterinary Business begins operating, or opens additional FOPs or OOH Centres, as the case may be; and (ii) the following 31 March.

‘Qualifying Veterinary Business’ means a Veterinary Business which operates one or more FOPs or OOH Centres. It includes Limited Service Providers and sole practitioner vets, but excludes charitable organisations that do not provide Veterinary Services for Household Pets for profit.

‘RCVS’ means the Royal College of Veterinary Surgeons.

‘RCVS Activities’ means:

- (a) monitoring compliance by Veterinary Businesses with the Veterinary Services Market Investigation Order 2026 and this Veterinary Services Market Investigation (Funding) Order 2026;
- (b) improving the functionality of the Find a Vet website and operating and maintaining it on an ongoing basis;
- (c) collecting information from Veterinary Businesses to present on the Find a Vet website;
- (d) sharing information from the Find a Vet website with approved third parties, including setting up the approval and sharing process;
- (e) contracting with an approved ADR provider which offers mediation services to Veterinary Businesses;
- (f) producing, distributing to Veterinary Businesses, and publishing, standardised literature and information about the ability of Pet Owners to request written prescriptions;
- (g) publishing the level of the monetary threshold above which Veterinary Businesses will be required to ensure that Pet Owners are provided with a written estimate for treatments;
- (h) developing and publicising a decision tree to help Pet Owners navigate the different routes to redress when they have a complaint about a Veterinary Business;

- (i) collecting, analysing and publishing on an annual basis data and insights on complaints in the market for Veterinary Services for Household Pets;
- (j) providing independently assured estimates by an auditor or another suitably skilled, qualified and experienced third party of the costs that it expects to incur in carrying out the RCVS Activities and operating and administering the system for collecting the Levy; and
- (k) any other activities which are reasonably necessary to put in place, operate and maintain the systems, mechanisms, arrangements and activities described in (a) to (j) above.

‘RCVS Funding Estimate’ means the same as in the Veterinary Services Market Investigation Royal College of Veterinary Surgeons (Funding) Undertakings 2026.

‘Subsequent Levy Payment’ means the payment of such sum per year as the CMA shall notify to Qualifying Veterinary Businesses following consultation by the RCVS on its RCVS Funding Estimate for a Subsequent Relevant Period and the CMA’s approval, subject to that consultation, of that estimate.

‘Subsequent Relevant Period’ means a period of 24 months, with the first such period beginning on 1 April 2027 and ending on 31 March 2029 and further such periods running for each 24-month period thereafter.

‘Trading Name’ means the name under which a Qualifying Veterinary Business operates and markets its services to Pet Owners.

‘Veterinary Business’ means a person (any entity whether it is a legal person like a company, in a joint venture or partnership, or an individual) carrying on a business that comprises the retail provision of one or more Veterinary Services to Pet Owners for their Household Pets.

‘Veterinary Services Market Investigation Order 2026’ means the order to be imposed on veterinary businesses under section 161 and Schedule 8 of the Act by 23 September 2026, as stated in the Final Report.

‘Veterinary Services’ includes, but is not limited to, the provision of:

- (a) FOP services and OOH FOP services;
- (b) OOH Provider Services;
- (c) diagnostic laboratory services;

- (d) animal hospital services;
- (e) referral centre services;
- (f) pet cremation services;
- (g) pet care plans; and
- (h) prescribed veterinary medicines.

Unless expressly stated or the context requires otherwise, other words and phrases have the same meaning as is given to them in the Final Report and they shall be construed accordingly.

3. Investigation powers

- (1) Section 174 of the Act shall apply to the enforcement functions of the CMA under this Order.

PART 2

RCVS funding

4. RCVS Activities funding

- (1) Qualifying Veterinary Businesses shall contribute to the costs of funding the RCVS Activities by paying the Levy to the RCVS.
- (2) In respect of the Initial Relevant Period:
 - (a) Each Qualifying Veterinary Business which is operating on the Levy Commencement Date shall pay to the RCVS the Initial Levy Payment for each FOP and for each OOH Centre it operates.
 - (b) Each Qualifying Veterinary Business which begins operating, or which opens additional FOPs or any OOH Centres, after the Levy Commencement Date shall pay a Pro-rated Proportion of the Initial Levy Payment for each FOP, additional FOP, or OOH Centre, as the case may be, that it operates.
- (3) In respect of any Subsequent Relevant Period:
 - (a) Each Qualifying Veterinary Business which is operating on the day that period starts shall pay to the RCVS the Subsequent Levy Payment for

each FOP and each OOH Centre it operates. Those businesses shall also make a payment of the Subsequent Levy Payment calculated in the same way 12 months later.

- (b) Each Qualifying Veterinary Business which begins operating, or which opens additional FOPs or any OOH Centres, after the day that period starts shall pay to the RCVS a Pro-rated Proportion of the Subsequent Levy Payment for each FOP, additional FOP, or OOH Centre, as the case may be, that it operates.
 - (c) Each Qualifying Veterinary Business to which Article 4(3)(b) applies shall also pay to the RCVS the Subsequent Levy Payment for the year beginning on 1 April following the date it becomes liable to make payment under that Article. Such Subsequent Levy Payment shall be made for each FOP and each OOH Centre it operates (but shall not duplicate any Levy payment the business is liable to make in accordance with Article 4(3)(a)).
- (4) Each Qualifying Veterinary Business shall pay the Initial Levy Payment no later than 44 days after the Levy Commencement Date and the Subsequent Levy Payment that it is required to pay no later than 30 days after the date on which it becomes liable to make that payment in accordance with Article 4 of this Order. Such businesses shall make any payment of the Pro-rated Proportion of the Initial Levy Payment or the Pro-rated Proportion of the Subsequent Levy Payment for which they are liable within 30 days of the time limit (specified in Article 5(3) below) for notifying the RCVS of the circumstances that give rise to any such liability. Each business shall make such payments in accordance with the payment arrangements put in place by the RCVS pursuant to the Veterinary Services Market Investigation Royal College of Veterinary Surgeons (Funding) Undertakings 2026.
- (5) If a Qualifying Veterinary Business fails in accordance with the requirements of this Order to pay the RCVS an amount for which it is liable under the Order, it shall, additionally, be required to pay the RCVS within 30 days of the RCVS demanding payment the RCVS's reasonable administration costs in seeking payment of the sum for which the business is liable.
- (6) The payments that Qualifying Veterinary Businesses are liable to pay to the RCVS in accordance with this Order shall, where they are unpaid and owed to the RCVS, be recoverable by the RCVS as a debt.

PART 3

Information required by the RCVS

5. Information required by the RCVS from veterinary businesses

- (1) Each Qualifying Veterinary Business operating on the Levy Commencement Date must supply the RCVS with the following information in writing by [date 14 days after the Levy Commencement Date]:
 - (a) its registered or company name (if applicable);
 - (b) its Trading Name;
 - (c) its head office address (or, if it does not have such an address, an address at which it will receive correspondence);
 - (d) the name and email address of an individual who has authority to act on behalf of the Qualifying Veterinary Business responsible for communicating with the RCVS about the business's compliance with this Order; and
 - (e) the name, and postal and email addresses, of each FOP and each OOH Centre it operates.
- (2) Each Qualifying Veterinary Business which starts operating after the Levy Commencement Date must supply the RCVS with the same information in writing as specified in Article 5(1) and with the specific date that it started operating. The Veterinary Business must supply that information no later than 28 days after the start of such operation.
- (3) Where any of the information a Qualifying Veterinary Business is required to provide to the RCVS in accordance with this Article 5 changes, the business must notify the RCVS of the changes no later than 28 days after they occur.

PART 4

Monitoring and compliance

6. Duty to provide information

- (1) The CMA may, by written notice to any Qualifying Veterinary Business, require that Qualifying Veterinary Business to supply to the CMA such information and documents as the CMA may reasonably require for the purposes of this Order (including for the purpose of monitoring the carrying out of the requirements of this Order and for reviewing the effectiveness of this Order).
- (2) Any Qualifying Veterinary Business to which a notice is given under Article 6(1) shall be under a duty to supply the information required save that no Qualifying Veterinary Business shall be required to supply any information which it could not be compelled to supply in evidence in civil proceedings before the High Court in England and Wales, or Northern Ireland, or the Court of Session in Scotland.
- (3) The notice shall state:
 - (a) the information required;
 - (b) the period within which the information is to be provided to the CMA (such period to be reasonable); and
 - (c) the possible consequences, in accordance with section 167 of the Act, of not providing the information within the stated period and in the required manner.
- (4) Subject always to Part 9 of the Act, the CMA may publish any information or documents that it has received in connection with the monitoring or the review of this Order for the purpose of assisting the CMA in the discharge of its functions under or in connection with this Order.

7. Compliance information

- (1) If a Qualifying Veterinary Business becomes aware that it is not compliant, or is likely to become non-compliant, with any requirement of this Order, it must report this non-compliance, or likely non-compliance, to the CMA and the RCVS within 14 days of becoming aware that it is not compliant or likely to become non-compliant.
- (2) The report a Qualifying Veterinary Business makes in accordance with Article 7(1) must include statement of:
 - (a) the circumstances of the breach, or likely breach, of the Order that are within the business's knowledge; and

- (b) what the business is doing to rectify the breach and ensure it is not repeated.

8. Directions

(1) The CMA may give directions falling within Article 8(2) to:

- (a) a person specified in the directions; or
- (b) a holder for the time being of an office so specified in any body of persons corporate or unincorporated.

(2) The directions referred to in Article 8(1) are directions in writing:

- (a) to take such action as may be specified or described in the directions for the purpose of carrying out, or ensuring compliance with, the requirements of this Order; or
- (b) to do, or refrain from doing, anything so specified or described which the person is required by this Order to do or refrain from doing.

(3) In Article 8(2)(a) above, 'action' includes steps to introduce and maintain arrangements to ensure that any director, employee or agent of a Qualifying Veterinary Business carries out, or secures compliance with, this Order.

(4) The CMA may vary or revoke any directions so given.