VETERINARY SERVICES FOR HOUSEHOLD PETS MARKET INVESTIGATION

The Veterinary Services Market Investigation Royal College of Veterinary Surgeons Undertakings 2026

Notice of proposal to accept Undertakings from the RCVS pursuant to sections 159 and 165 of, and Schedule 10 to, the Enterprise Act 2002 and public consultation on the proposed Undertakings

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. Those features are set out in section 15 of Part A of the Final Report (in paragraphs 15.15 and 15.23).[1]

4. The Group decided that, in order to address the AEC and resulting customer detriment, a package of remedies should be adopted consisting of:

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[1] 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.

(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

(v) Clear information on end-of-life services

(b) Measures to remove barriers to engagement and competition, relating to:

(i) Ensuring that vets and vet 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

(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. To support this integrated package of remedies, the Group decided to impose obligations on Veterinary Businesses to require them to set and ensure compliance with policies, processes and practices across their FOPs, OOH services, Referral Centres, animal hospitals, diagnostic laboratories, crematoria and online pharmacies (as the case may be).

6. The Group also decided to implement this remedies package by requiring the RCVS (as the existing sector regulator) to play an enhanced role, in order to address the wide-ranging concerns identified in the Final Report. The Group decided that the RCVS should be required – by means of Undertakings it gives to the CMA or by Order – to perform certain activities to support the remedies to be imposed on Veterinary Businesses, and to monitor compliance by those businesses with those remedies (**RCVS Activities**). The Group decided that the costs of the RCVS's performance of the RCVS Activities should be met by Veterinary Businesses paying a Levy to the RCVS.

7. The remedies will therefore be implemented by a combination of (i) CMA Orders on Veterinary Businesses and (ii) the RCVS entering into legally binding Undertakings.[2] Some of these instruments would set out substantive requirements on vet businesses and the RCVS. Others (such as the Undertakings to which this Notice relates and the Order referred to in paragraph [8(d)] below) would provide mechanisms which put in place the funding required for the RCVS's performance of the RCVS Activities.

8. Specifically, the package of remedies will be implemented by:

(a) the Order imposing substantive requirements on Veterinary Businesses (to be known as 'the Veterinary Services Market Investigation Order 2026' and referred to in this Notice as the **Substantive Order**);[3]

(b) undertakings entered into by the RCVS relating to the RCVS Activities, to which this Notice relates (to be known as 'the Veterinary Services Market Investigation Royal College of Veterinary Surgeons Undertakings 2026' and referred to in this Notice as the **RCVS Substantive Undertakings**);[4] and

(c) the Veterinary Services Market Investigation (Funding) Order 2026 (the **Funding Order**);

(d) the Veterinary Services Market Investigation Royal College of Veterinary Surgeons (Funding) Undertakings 2026 (the **RCVS Funding Undertakings**);[5] and

(e) recommendations to government, the RCVS and the VMD as set out in the Final Report.

9. In accordance with section 165 of, and paragraph 2(1)(a) of Schedule 10 to, the Act, the CMA hereby gives notice of its intention to accept the RCVS Substantive Undertakings as part of an effective and proportionate package of remedies to remedy, mitigate or prevent the AEC and any resulting customer

[2] 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.

[3] The CMA's proposal to accept the RCVS Substantive Order is the subject of a separate notice published on the same date as this Notice, together with a draft of that Order.

[4] 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.

[5] The CMA's proposals to make the Funding Order and accept the RCVS Funding Undertakings were published for public consultation on 30 June 2026.

detriment, which it identified in the Final Report. This Notice and the draft RCVS Substantive Undertakings will be published on the CMA website.[6]

10. The Purpose of the RCVS Substantive Undertakings would be to help to give effect to the Group's decisions in the Final Report about activities that the RCVS will be required to perform to remedy, mitigate or prevent the AEC it found and the resulting detrimental effects on customers. The provisions of the RCVS Substantive Undertakings would be consistent with those decisions. The effect of the RCVS Substantive Undertakings would be to help to remedy, mitigate or prevent the AEC and the detrimental effects on customers that result from it. The CMA considers that the making of the RCVS Substantive Undertakings would be justified on those bases.

11. The CMA invites written representations on the draft RCVS Substantive Undertakings from any interested person or persons. As the Undertakings are intended to give effect to decisions set out in the Final Report, any such representations should not be about those decisions. They should instead relate to matters including:

    (a) whether the Undertakings are consistent with the decisions in the Final Report;

    (b) the manner in which the draft Undertakings would give effect to the decisions in the Final Report; and

    (c) the facts and matters that the CMA considers justify the acceptance of the Undertakings in the form proposed (or any facts and matters a party considers do not justify their acceptance in that form).

12. The CMA will have regard to any representations made in response to this Notice and may make modifications to the Undertakings as a result. If the CMA considers that any representation necessitates any material change to the Undertakings, the CMA will give notice of the proposed modifications.

13. Representations made in response to this Notice should reach the CMA by 11.59pm on 20 August 2026. Representations should be made in writing and should be addressed to:

    VetsMI@cma.gov.uk

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[6] Terms used in this Notice have the same meaning as in the draft Substantive Undertakings, unless stated otherwise or the context requires otherwise.

Martin Coleman

Inquiry Group Chair

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