

Response to CMA consultation on draft funding Order and Undertakings, published on 30 June 2026

About this document

1. This document forms the response from the Royal College of Veterinary Surgeons (RCVS) to the Competition and Markets Authority (CMA) consultation on the draft funding Order and Undertakings, as published on 30 June 2026.

Format

2. The document is structured in two parts:
 - a. Part one: Summary statement
 - b. Part two: Tables with specific comments against the five documents that are the subject of this consultation:
 - Part two (a) – draft funding Order notice
 - Part two (b) – draft funding Order
 - Part two (c) – draft Explanatory Note
 - Part two (d) – draft funding undertaking notice
 - Part two (e) – draft funding Undertakings

Further information

3. For further information, please contact the RCVS CEO, Lizzie Lockett, at l.lockett@rcvs.org.uk.

Part one: Summary statement

4. In its Final Decision Report, the CMA found adverse effects on competition in the market for veterinary services for household pets. This is just one of the areas in which veterinary professionals contribute to the public interest and animal health and welfare, however it is an important one and one that employs the majority of vets and vet nurses. Pricing and competition in this narrowly-defined market are primarily dictated by veterinary businesses and we are pleased that the CMA has agreed businesses should be asked to pay a levy to fund the RCVS activities in order to deliver remedies outlined in the Final Decision Report. We strongly agree that business, rather than individual vets and vet nurses should meet this cost.
5. We note that the cost of the CMA's remedies will be borne by some, but not all the veterinary businesses that will be the subject of remedies and monitoring by the RCVS. We understand that this is a decision for the CMA to make, but acknowledge that there may be different views as between first opinion practices and referral centres, for example. While we appreciate the potential management advantages afforded by a simple approach to liability for the levy, the cost of the CMA remedies should be met in a way that is both proportionate and fair to consumers and veterinary businesses.
6. The RCVS provided extensive support to the CMA during the market investigation, and we have engaged regularly with the CMA since publication of the Final Decision Report. We are pleased the CMA has asked us to carry out activities to support and monitor the remedies, as we feel this will be most cost-effective and appropriate for both the professions and the public. The relationship between the organisations has been collaborative and positive. The resources needed for the RCVS to undertake these activities have been reasonably estimated and can be delivered in an effective and proportionate manner.
7. We welcome the decision by the CMA to first make the Funding Order and accept associated Undertakings from the RCVS if agreed, prior to the substantive remedies being implemented. This will allow us to establish the infrastructure needed for both monitoring of remedies and publication of information about veterinary practices, that will give consumers the best information when choosing veterinary care for their pets. This timing will also allow us to be in a position to meet the timescales proposed by the CMA for implementation of the substantive remedies and start to address the issues identified by the CMA Final Decision Report as soon as possible.
8. The funding regime to be established by the Funding Order and Undertakings will place a number of obligations on the RCVS. These will include requirements around accounting and reporting. We support these requirements that will reinforce our responsible spending decisions and provide oversight and assurance to consumers, veterinary businesses and veterinary professionals about how the RCVS activities are being provided and funded.
9. As the Government moves to consider new legislation governing veterinary services to replacing the aging Veterinary Surgeons Act 1966, we consider the RCVS will be in a good position to engage in wider regulation of veterinary practices and the delivery of allied veterinary services. The CMA remedies reinforce the importance of consumers as clients of

veterinary professionals; the RCVS accepts that a consumer duty may form part of any new legislation, providing it does not conflict with our primary focus on animal health and welfare and public health.

10. We consider the drafting of the documents being consulted upon is broadly consistent with the CMA's Final Decision Report. We also consider the drafting of these documents will help put the RCVS in a position to be able to assist the CMA to achieve the aims of the remedies set out in the Final Decision Report.

Part two (a): Draft funding Order

Par./Art.	Wording	RCVS response
Par. 8(b) and thereafter	improving the functionality of the Find A Vet website...	<i>References throughout to 'improving' Find a Vet should be replaced with 'enhancing' as stated in the FDR. Find a Vet was created for a different purpose from that which will now be to also deliver CMA remedies. It does not require improving in relation to its original purpose, but rather enhancing to provide additional functionality for CMA purposes.</i>
Par. 8(b) and (c)	...the Find A Vet website	<i>References to 'Find A Vet' should be replaced with 'Find a Vet' as it appears correctly elsewhere in the document.</i>
Art. 4(5)	...it is liable under the Order...	<i>Reference to 'the Order' in this Article should be to 'this Order' or 'the Funding Order'.</i>
Art 5.1	Each Qualifying Veterinary Business operating...	<i>The requirement to provide information under this Article only applies to Qualifying Veterinary Businesses which are not all the veterinary businesses that will be subject to the CMA's remedies. A requirement to provide information will need to be included in the substantive Order. Names of individuals responsible for the compliance by each individual veterinary business premises (i.e. FOPs, referrals centres, OOH centres etc.) should also be provided to allow the RCVS to monitor compliance effectively and proportionately.</i>
Art 7(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...	<i>The requirement to report non-compliance as drafted, will only apply to Qualifying Veterinary Businesses and the provisions of the Funding Order and not the substantive remedies. A requirement to report non-compliance with remedies could be considered for inclusion in the substantive Order.</i>
Art. 7(2)	the circumstances of the breach, or likely breach, of the Order...	<i>Reference to 'the Order' in this Article should be to 'this Order' or 'the Funding Order'. See also comment above about applicability to the substantive remedies.</i>

Part two (b): draft Explanatory Note to the funding Order

Par.	Wording	RCVS response
Par. 4(a)(ii) and thereafter	improving the functionality of the Find A Vet website...	<i>References throughout to 'improving' Find a Vet should be replaced with 'enhancing' as stated in the FDR. Find a Vet was created for a different purpose from that which will now be to also deliver CMA remedies. It does not require improving in relation to its original purpose, but rather enhancing to provide additional functionality for CMA purposes.</i>
Par. 4(a)(ii) and thereafter	...the Find A Vet website	<i>References throughout to 'Find A Vet' should be replaced with 'Find a Vet'.</i>
Par. 10 - heading	Possible consequences of non-compliance with the Order	<i>In the heading above article 10, the reference to 'the Order' should be to 'the Funding Order'.</i>
Par. 38	...in the event that Article 4(3)(a) also applies to the business).	<i>Additional space between 'that' and 'Article' and missing space between '4(3)(a)' and 'also'.</i>

Part two (c): funding Order Notice

Par.	Wording	RCVS response
9	...draft Order...	<i>In this paragraph, references to the 'draft Order' should be to the 'draft Funding Order'.</i>
13(b) and thereafter	Improving the functionality of the Find A Vet website...	<i>References throughout to 'improving' Find a Vet should be replaced with 'enhancing' as stated in the FDR. Find a Vet was created for a different purpose from that which will now be to also deliver CMA remedies. It does not require improving in relation to its original purpose, but rather enhancing to provide additional functionality for CMA purposes.</i>
13(b) and thereafter	...the Find A Vet website	<i>References throughout to 'Find A Vet' should be replaced with 'Find a Vet'.</i>
34	Following these discussions, the RCVS made revisions to its monitoring proposal, particularly in relation to its methodology, which significantly reduced the estimated cost of the RCVS's proposal.	<i>The initial RCVS monitoring proposal was based on information available at that time. The revised proposal was prepared with additional information provided thereafter by the CMA. The estimated cost is therefore 'proportionately reduced' rather than 'significantly reduced'.</i>

Part two (d): draft funding Undertakings

Par.	Wording	RCVS response
Par. 8(b) and thereafter	improving the functionality of the Find A Vet website...	<i>References throughout to 'improving' Find a Vet should be replaced with 'enhancing' as stated in the FDR. Find a Vet was created for a different purpose from that which will now be to also deliver CMA remedies. It does not require improving in relation to its original purpose, but rather enhancing to provide additional functionality for CMA purposes.</i>
Par. 8(b) and thereafter	...the Find A Vet website	<i>References to 'Find A Vet' should be replaced with 'Find a Vet'.</i>

Part two (e): draft funding Undertakings Notice

Par.	Wording	RCVS response
13(b) and thereafter	Improving the functionality of the Find A Vet website...	<i>References to 'improving' Find a Vet should be replaced with 'enhancing' as stated in the FDR. Find a Vet was created for a different purpose from that which will now be to also deliver CMA remedies. It does not require improving in relation to its original purpose, but rather enhancing to provide additional functionality for CMA purposes.</i>
13(b) and thereafter	...the Find A Vet website	<i>References to 'Find A Vet' should be replaced with 'Find a Vet'.</i>
33	Following these discussions, the RCVS made revisions to its monitoring proposal, particularly in relation to its methodology, which significantly reduced the estimated cost of the RCVS's proposal.	<i>The initial RCVS monitoring proposal was based on information available at that time. The revised proposal was prepared with additional information provided thereafter by the CMA. The estimated cost is therefore 'proportionately reduced' rather than 'significantly reduced'.</i>