



Vets MI
CMA
25 Cabot Square
London
E14 4QZ

30th July 2026

Dear CMA Vets MI Team,

Response to the Consultation on the Draft Funding Order & Draft Funding Undertakings

We are writing in response to the recommendations set out in the Draft Funding Order and Draft Funding Undertakings.

We recognise the important role that the Royal College of Veterinary Surgeons (RCVS) will play in ensuring compliance and supporting industry confidence, and that their increased responsibilities will require financial support from their members. However, we have concerns regarding the proposed funding model, its long-term governance and the impact on independent veterinary practices.

Referral Centres & OOH-only Exemption

Our principal concern is the apparent exclusion of referral centres and OOH-only providers from the levy.

We do not understand the policy rationale for requiring First Opinion Practices (FOPs) to fund the RCVS activities while exempting referral & OOH-only centres, many of which are likely to operate substantial and profitable veterinary businesses that will require as much activity monitoring as FOPs.

The remedies being implemented are intended to improve confidence, transparency and competition across the companion animal sector. We would therefore expect all companion animal veterinary businesses to contribute fairly to the associated costs unless there is a clear and evidence-based justification for differential treatment.

We therefore ask the CMA to reconsider this and provide absolute clarity on the requirements.

Hook Norton Branch (Hospital)

White Hills Surgery, Sibford Road,
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Farm & Equine 01608 730085
Small Animal 01608 730501

Charlbury Branch

The Spendlove Centre,
Enstone Road, Charlbury,
OX7 3PQ

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Deddington Branch

Heritage House,
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Moreton-in-Marsh Branch

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Per-site Levy

We are not persuaded that a levy based solely on FOP sites is the most equitable approach. Whilst it is possible that alternative approaches may be administratively burdensome, veterinary businesses would easily be able to provide more accurate information to the RCVS, some of which is already submitted via the Practice Standards Scheme and practice registration information, for example the number of veterinary surgeons employed.

A levy based on full-time equivalent (FTE) veterinary professionals, or a hybrid model comprising a modest, fixed fee plus a variable element related to workforce or business size, would more accurately reflect business scale and capacity to contribute.

It is worth noting that most (Large Corporate Groups) LCG practice sites operate separately from one another, whereas most independent practices will operate satellite “branch” sites that together form the “practice”.

On the CVS [website](#) they state “We have over 490 companion animal first opinion veterinary practices in the UK and Australia. *They retain their unique identity and trade under established names.*” Which clearly defines their sites as financially, reputationally and organisationally independent of one another.

Whereas, for example at HNVG, each of our branch sites is clearly branded and therefore part of “Hook Norton Veterinary Group,” and our vets move between them, ensuring business unity, cohesion and continuity of care.

By introducing a levy based on physical premises, we believe the CMA are unfairly loading independent practices with a financial burden that is not equitable. Nor does this approach recognise the difference between the way independent practices and LCGs operate. We would ask that the CMA to assess not only the levy in isolation, but also the cumulative impact of compliance, training, reporting and administrative obligations on smaller businesses.

Impact on Independent Practices

We believe that independent practices are likely to be disproportionately affected by the proposed model.

LGCs can spread compliance and regulatory costs across extensive networks and central support functions. Independent practices have fewer opportunities to absorb additional costs and are already facing significant resource requirements associated with implementation of the CMA remedies.

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Future Cost Control and Governance

We understand that the current cost estimates relate to the first year of operation. Without appropriate controls, practices face the prospect of an open ended and potentially increasing funding obligation over which they have very little control or influence.

We therefore request that the CMA establish strong governance arrangements, including regular consultations on proposed budgets, transparent reporting and formal review mechanisms.

ADR Clarity

We would also welcome further clarity regarding the proposal to contract with an approved Alternative Dispute Resolution (ADR) provider offering mediation services to veterinary businesses.

It is unclear how this proposal interacts with existing arrangements, including the Veterinary Client Mediation Service (VCMS), whether a separate provider is envisaged, and whether the associated costs may ultimately fall on practices through mechanisms additional to the levy itself.

In conclusion, we would be grateful if the CMA could further consider the issues we have raised and appreciate the opportunity to comment.

Yours faithfully,

[Redacted Signature]

[Redacted Name]

Managing Director
Hook Norton Veterinary Group (HNVG Ltd)

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