



**BLYTHMAN &
PARTNERS LTD**
VETERINARY PRACTICE

Director: Miss Heather G.B. Morton B.V.M.S. M.R.C.V.S.

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Date: 2nd July 2026

*Remedies Implementation Case Team
Competition and Markets Authority
(Submitted via CMA Consultation Portal)*

RE: Veterinary Services Market Investigation – Response to the Draft Funding Order Consultation

To Whom It May Concern,

I am writing on behalf of our independent, multi-site veterinary practice to formally object to the proposed flat-rate levy outlined in the draft Funding Order. While we understand the CMA's desire to fund the RCVS's monitoring compliance, the current mechanism punishes the exact independent veterinary practices the market investigation claimed it wished to protect.

Running an independent practice in our current financial climate is a large balancing act, as we are a multi-site independent veterinary practice who provides and funds our own 24/7 emergency and out-of-hours (OOH) service. We are already facing a mountain of unrecoverable costs this year just to prepare for the wider CMA remedies – this includes overhauling our website for price transparency, retraining staff to issue mandatory written estimates for treatments over £500, and absorbing the revenue hit from the new prescription fee caps.

To add a flat-rate regulatory tax of approximately £400 per site on top of this compliance burden is completely counterproductive. We believe it directly contradicts the core aim of your investigation, which was to lower costs for pet owners. If our fixed operational overheads are forced to increase further by regulatory levies, those costs eventually have to be accounted for in our clinical fees. The consumer loses, and the goal of making veterinary care more affordable fails.

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Furthermore, applying a blanket flat fee across the board completely ignores the realities of the market detailed in your March 2026 Final Report. A flat fee per site would treat a locally owned, multi-site independent veterinary business in the exact same way as a much larger, corporate-backed business with hundreds of clinics and deep private-equity pockets.

According to the draft Explanatory Note, this flat structure was chosen simply because it was easier for the CMA to administer. Prioritising administrative convenience over economic fairness places a disproportionate weight on independent practices. If independent profit margins are squeezed further by these flat taxes, local competition drops, and the corporate consolidation you spent time investigating will only accelerate.

We strongly urge the CMA to amend the Funding Order. We strongly believe the levy should either be scrapped entirely for independent practices, or structured as a tiered system based on total corporate turnover rather than physical site numbers.

Additionally, the commencement of any levy should be delayed until substantive remedies are fully in place, giving veterinary practices a chance to steady their finances first.

Thank you for reviewing our feedback and for the opportunity to voice our concerns.

Yours sincerely,

A large black rectangular box redacting the signature of Heather Morton.

Heather Morton BVMS MRCVS
Director and Senior Veterinary Surgeon
Blythman & Partners Veterinary Surgeons