

Response to CMA Vets market investigation: draft substantive Order and Undertakings

My first response is regarding this section on page 9:

‘Initial Additional Prescription Fee Cap’ means [£12.50 inclusive of VAT.

This will be adjusted for inflation between the date of the Final Decision

Report and the latest monthly CPI figure available before the Order is made].

Since the release of the CMA remedies, I have heard the media incorrectly say on multiple occasions that prescription medications will be capped, this is incredibly misleading and confusing to clients. This will certainly increase tension when dispensing medications to clients that have heard the incorrect wording from the media. The wording of the media is not stating that it is in fact the cost of a written prescription that has been capped. I have heard clients repeat what the media has said and think that prescription medications are going to be capped under the new CMA remedies.

My second response is regarding this section on page 16 of the document:

›Treatment.Pathway".means.all.diagnostic.tests.and-~~or~~.treatments.which.a.

Veterinary.Professional?using.their.judgement.and.exercising.reasonable.

care.and.skill?has.recommended.and-~~or~~.recommends.for.the.purpose.of.

diagnosing?treating.and-~~or~~.managing.what.they.judge.the.Pet's.medical.

condition.is.reasonably.likely.to.be;It.includes;.

(a).diagnostic.tests.and-~~or~~.treatments.already.provided.to?or.chosen.by?

the.Pet.Owner.

vi;diagnostic.tests.and-~~or~~.treatments.reasonably.likely.to.be.provided.

over.the.next.twelve.months?including.those.which.involve.Referral.

Services.provided.at.a.Referral.Centre..

(b).any.ancillary.or.associated.services.and.products?including.medicines?

anaesthetics?pre_and.post_operative.care?follow_up.or.routine.visits?

and.reasonably.known.contingent.elements.dependent.on.diagnostic.

tests.and..

(c).where.applicable?euthanasia.and.Cremation.Services;..

I am not sure if this section has been discussed firstly with a practicing veterinary surgeon, as the ability to predict how a disease process will behave and what diagnosis processes are going to be required within a 12-month period in a patient can be clinically impossible, this may lead to the unintentional development of protocols to simplify the process which take away flexibility. As much as we have access to journals, papers and literature on various diseases they do not all follow a uniform pattern, they behave differently and cannot always be predicted.

As veterinary professionals with work with a wide range of species, each individual professional will also have variable knowledge on certain species, and certain diseases/conditions.

I feel that this section does not provide flexibility to be able to change a diagnostic process to suit the needs of the patient and the client, it does not offer the ability to offer a flexible treatment pathway to suit the changing requirements of the patients and their owners.

Patients can also suffer from concurrent diseases which can affect medication, treatment options and the behaviour of diseases. Some of these diseases may not yet have been diagnosed at point of the start of the 12-month plan of treatment.

There are far too many variables to be able to predict a 12-month treatment pathway in patients which do not have long life spans. How would this section be effective within a short living species such as a hamster, rat, mouse or invertebrate etc. who's life span at point of veterinary contact may be much shorter than a 12-month period. Would this advertise a false expectation to the patient's owner by providing a 12-month treatment plan for a patient that is not expected to survive beyond 12 months? This could become misleading to clients who want to provide the best treatment to their pet but not fully understand the life expectancy depending on a disease and the patients' health.

My third response is in regard to the proposed client notices about medications and written prescriptions: I feel that the language used is inappropriate and potentially misleading to graphically represent things in this way. We should be clear and transparent with clients.

My final thought is on the discussion around having a 'Price comparison list of fees for each veterinary practice'. This concerns me greatly, veterinary medicine should not be compared on price alone, the reason for a variable cost can be due to many factors. There have been many stories shared online, in the media and also whilst I attended a

recent veterinary conference regarding clients traveling across the sea to access veterinary care outside of the United Kingdom due to the cost being 'cheaper'.

As a registered veterinary nurse who has undertaken additional certificates after I have qualified, who also works alongside other dedicated and passionate veterinary professional striving to improve patient care and welfare, I find it increasingly worrying that the cost of veterinary surgery and care is being compared on 'a like for like' basis.

Many clients are not aware that the title 'Veterinary nurse' is not protected, when informed of this they are shocked that their pet may not receive a veterinary professional who is on the register for nurses under the RCVS. May I ask that during these 'cheaper' options of veterinary surgery are registered veterinary nurses caring for these patients? -whilst they are in the practice, whilst they are receiving medications through varying routes of administration, whilst they are being prepared for general anaesthesia, whilst they are being maintained under local or general anaesthesia, and whilst during the recovery period-where there are many papers detailing how high risk the recovery period is for any species of animal who has undergone a general anaesthetic. This risk increasing depending on the health status of the patient and its ASA classification grade at admit to the practice.

Knowledge, medications, skilled staff, equipment, appropriate facilities should not be viewed in a cost cutting price comparison site template. I would much rather pay more for my pet to be treated by a veterinary surgeon who is supported by a registered veterinary nurse in an appropriate facility, with access to appropriate access to equipment to improve patient welfare and safety.

Veterinary care must not be viewed in the same way as car or holiday insurance, or as if purchasing a new appliance for the home, it is a skilled and highly professional driven industry, by using price comparison it cheapens what veterinary care is at its core, and what this then advertises to clients by using this format.