



HOP TO SAVE RABBITS

Response to the CMA consultation on the Veterinary Services Market Investigation

Draft Substantive Order and Undertakings

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Hop to Save Rabbits is content for this response to be published and attributed to Hop to Save Rabbits.

Documents addressed

Draft Substantive Order (Articles 7, 10, 11 and 22; Schedules 1 and 4); Draft Explanatory Note; Draft Annex 1; Draft RCVS Substantive Undertakings (paragraphs 4.1–4.6 and 7.15–7.19); and the RCVS monitoring proposal.

1. About Hop to Save Rabbits

Hop to Save Rabbits (HTSR) works to improve protection for rabbits and hares through formal evidence, public-policy engagement, campaigns and petitions. This response concerns companion rabbits in the household-pet veterinary market. It does not seek to extend this consultation into wider questions of veterinary education, clinical standards, insurance regulation or wildlife policy.

2. Scope and overall view

HTSR considers the draft instruments broadly consistent with the Final Report. The focused changes below would, in our view, help the drafting achieve the aims of the remedies more fully across the household-pet market. We do not ask the CMA to revisit the inquiry group's decisions in the Final Report.

The statutory framework is the Enterprise Act 2002. The Final Report was published under section 136; the substantive Order is proposed under section 161; and the consultation procedure is being carried out under section 165 and Schedule 10. HTSR therefore confines its comments to drafting and implementation.

The central point

The draft Order has broad household-pet scope. HTSR proceeds on the basis that companion rabbits kept in the home fall within that scope. Our concern is not formal exclusion. It is whether the data fields, search functions and optional pricing routes used to deliver the remedies make rabbits separately identifiable and practically useful to rabbit owners.



3. Summary of recommendations

HTSR asks the CMA to make three focused implementation changes. Each builds on information or functionality already present in the draft package.

1 Complete the species taxonomy in Schedule 4

Add the missing animal-species lookup, include “Rabbit” and “Other - please specify”, and preserve species as a usable field for anonymised RCVS analysis.

2 Make rabbit services searchable on Find a Vet

Use “Rabbit” as a structured pet type and user-facing filter, including for first-opinion, out-of-hours and referral services where the underlying data show that rabbits are routinely treated.

3 Clarify the existing route for voluntary rabbit pricing

Do not reopen the mandatory cat-and-dog categories. Instead, make the Final Report’s existing permission for other-species prices clear and usable in the Explanatory Note and indicative template.

4. Recommendation 1: complete the species taxonomy in complaint data

Documents and provisions addressed: *Draft Substantive Order, Article 22 and Schedule 4; Draft RCVS Undertakings, paragraphs 7.15–7.19; RCVS monitoring proposal.*

The published workbook already expects structured species data

Schedule 4 contains a field headed “Animal species”. Its instruction says “Select one from pre-defined list (see Lookups tab)”. This is a sensible design: species can be analysed reliably if it is captured as structured data rather than free text.

The animal-species lookup is absent from the published Lookups tab

HTSR checked the Schedule 4 workbook published for this consultation. The Lookups tab contains lists for complaint category, complaint sub-nature, outcome and actions taken. HTSR could not identify an animal-species list, even though the “Animal species” field directs the user to one. The final workbook should therefore complete that lookup.

This is a small technical omission, but it affects the efficacy of the complaint-data remedy. Article 22(3)(a) requires a Complaint Log submitted to the RCVS to use the format prescribed in Schedule 4. Paragraphs 7.15–7.19 of the Draft RCVS Undertakings then require the RCVS to collect and analyse complaint data, identify trends, frequently raised issues, underlying causes and outcomes, and publish an Annual Insights Report.

Requested change

- Add the animal-species list to the Schedule 4 Lookups tab.
- Include “Rabbit” as a distinct selectable category.
- Include “Other - please specify” so less common household-pet species are not forced into an inaccurate category.



- Retain species in the dataset used for RCVS analysis and, where sample sizes permit meaningful reporting without undermining anonymity, include species-level findings in the Annual Insights Report.

The Undertakings already require the Annual Insights Report to be anonymised. Species-level analysis need not identify a veterinary business, veterinary professional or pet owner. The point is simply to let the data show whether material species-specific patterns exist, rather than making rabbits invisible within an aggregate total.

5. Recommendation 2: make rabbit services searchable on Find a Vet

Documents and provisions addressed: *Draft Substantive Order, Article 10 and the definition of Basic Information; Draft Explanatory Note, paragraphs 77–84; Draft RCVS Undertakings, paragraphs 4.1–4.6.*

The remedy already collects the information needed

The Order’s “Basic Information” includes the types of pets treated at a practice. The Explanatory Note clarifies that this refers to animals treated commercially, rather than species seen only because of the obligation to provide emergency first aid. Article 10 then requires relevant information to be supplied to the RCVS for Find a Vet.

The Draft RCVS Undertakings require a structured data-input template, an accessible and user-friendly Find a Vet platform, user testing, and filtering and sorting by key data fields including pet characteristics, practice characteristics, service provision and price. Those provisions create a direct route to species-level visibility without changing the remedy itself.

Why rabbit-specific visibility matters

For a rabbit owner, the useful question is not simply whether a veterinary practice exists nearby. It is whether that practice routinely treats rabbits and, where the case is urgent or more complex, whether an out-of-hours centre or referral provider offers the relevant rabbit service. A broad household-pet or small-mammal label may not answer that question clearly enough.

RCVS referral guidance reinforces the practical importance of this information. When considering an appropriate referral, veterinary surgeons are expected to take account of factors including the location of the service, the urgency of treatment and the owner’s circumstances, including the availability and limitations of insurance. Both the referring and referral veterinary surgeon should also ensure that the client understands the likely costs of referral.

Insured and uninsured rabbit owners

PDSA estimated around 700,000 pet rabbits in the UK in 2025. Its 2024 rabbit data found that 23% of rabbits were insured and that 37% of owners who had not insured their rabbit said insurance was too expensive. HTSR does not ask the CMA to regulate pet insurance through this Order. The narrower point is that clear information about rabbit-capable services, location and likely costs is relevant to both insured and uninsured owners, particularly when a decision about referral or out-of-hours care has to be made quickly.



The materials reviewed do not establish a national average waiting time for rabbit referrals, and HTSR does not propose a fixed referral deadline. Urgency is a clinical matter. Our point is that identifying a suitable rabbit-capable provider should not itself create avoidable delay.

Requested change

- Include “Rabbit” as an explicit selectable pet type in the Article 10 / Find a Vet data-input template.
- Make “Rabbit” available as a clear front-end filter or search criterion on Find a Vet.
- Allow rabbit searches to be combined with service type - including first-opinion, out-of-hours and referral services - where those data are available.
- Use the user testing required by paragraph 4.5 of the Draft RCVS Undertakings to test a real rabbit-owner journey, such as locating an out-of-hours or referral provider that routinely treats rabbits.

These changes are commensurate with the remedy already designed. Veterinary businesses must provide the types of pets they treat; the RCVS must create structured fields; and the platform must support filtering by pet characteristics and service provision. The change would make those obligations practically useful to rabbit owners.

6. Recommendation 3: clarify the existing route for voluntary rabbit pricing

Documents and provisions addressed: *Draft Substantive Order, Article 7(2)(c); Schedule 1; Draft Explanatory Note, paragraph 56; Draft Annex 1; Final Report, Part B, paragraph 3.88 and footnotes 191–192.*

The mandatory price-comparison structure is limited to cats and dogs

Where the price of a Schedule 1 item varies by species or weight, Article 7(2)(c) uses six standard categories: cat and five dog weight bands. Draft Annex 1 follows the same structure. Schedule 1 nevertheless covers services that may also be relevant to rabbit owners, including consultations, vaccinations, castration and spaying, diagnostics and end-of-life care.

HTSR does not ask the CMA to make rabbit pricing mandatory through this consultation. The Final Report made a deliberate decision to limit the number of mandatory prices that businesses must provide and keep updated.

The Final Report already permits other-species prices

The relevant permission is clear in the Final Report. Paragraph 3.88 sets the six mandatory cat-and-dog categories. Footnote 191 states that, where a practice treats other species of household pets, it may publish those prices subject to consumer-protection law, but will not be required by the Order to do so. Footnote 192 also allows additional rows where a business provides alternatives to treatments or procedures in the defined list but those alternatives are not themselves defined in the list.

The implementation issue is therefore not whether rabbit prices should be made mandatory. It is practical: a practice reading Article 7 and Annex 1 sees a prescribed cat-and-dog template, while the route expressly permitted by the Final Report for other species is not prominent in the supporting material.



Requested change

HTSR asks the CMA to make the existing permission explicit in the Explanatory Note and in Draft Annex 1. For example, Annex 1 could include a short optional section such as:

Other household-pet species treated (optional): [species]

Where a practice chooses to publish prices for another household-pet species, it may add a species-specific price section, subject to consumer-protection law and the Final Report. For a rabbit price section, practices could use relevant Schedule 1 service names - for example vaccination, castration or spay - and any additional rows permitted by the Final Report where appropriate.

The CMA need not use those exact words. The purpose is to translate its existing Final Report decision into a usable implementation example. This would preserve the chosen limit on mandatory price publication while making voluntary rabbit pricing easier to understand and compare.

7. Supporting point: urgent treatment must not be delayed by information requirements

Documents and provisions addressed: *Draft Substantive Order, Article 11(8); RCVS Supporting Guidance on referrals and second opinions.*

HTSR supports the safeguard in Article 11(8). The ordinary timing requirement for a written estimate does not apply where the veterinary professional judges that delay would seriously adversely affect the pet's health and welfare; where the relevant cost condition is met, the estimate follows as soon as reasonably possible after the emergency has ended.

This matters for rabbit owners because the value of better consumer information should not be achieved at the expense of urgent care. HTSR's March 2026 EFRA briefing, drawing on PDSA data and rabbit-welfare guidance, highlighted that rabbits may mask pain and illness and can deteriorate rapidly. RCVS referral guidance likewise treats urgency as a relevant factor in deciding what referral is appropriate.

HTSR does not propose a different monetary threshold or a rabbit-specific referral time limit. We ask only that explanatory and implementation material preserve the clear principle already present in Article 11(8): estimates, comparison tools and other consumer-information measures should support informed choice without delaying clinically urgent diagnostics, treatment or referral.

8. Conclusion

The CMA's package is designed to give pet owners clearer information, better comparison tools and stronger complaint and redress mechanisms. HTSR considers the drafting broadly consistent with the Final Report. The three changes proposed here would help those remedies work more fully across the household-pet market without reopening the decisions already made.

HTSR therefore asks the CMA to: complete the Schedule 4 species taxonomy and preserve rabbit-identifiable complaint data; make rabbit services explicitly searchable on the enhanced Find a Vet platform; and make the Final Report's existing route for voluntary other-species pricing clear in the Explanatory Note and indicative template.



These are narrow and workable amendments. They use data the package already proposes to collect and functionality it already proposes to build. Their purpose is simple: where the veterinary-services remedy applies across the household-pet market, the tools used to deliver it should be capable of recognising rabbits within that market.

There is also a wider benefit to making rabbits visible within implementation. The Final Report itself recognises, at paragraphs 8.135–8.137, that complaint processes can provide data to improve services, identify where guidance may need to be updated, and support improvements in quality and learning. Consistent rabbit-identifiable information would strengthen that evidence base. It would not set clinical standards or determine how rabbit medicine should be practised; those matters sit outside this consultation. It would, however, make it easier for the veterinary profession and regulators to see where rabbit services are available, where recurring problems arise, and where service, referral or information gaps may emerge.

Over time, that better visibility can support professional learning, service development and the continued development of rabbit medicine. Properly accommodating rabbits within the household-pet market therefore has value beyond consumer comparison alone: it can contribute to a better-informed veterinary sector and strengthen the profession's ability to advance care for rabbits.

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References and documents considered

1. [CMA consultation: Vets market investigation - draft substantive Order and Undertakings](#) (opened 21 July 2026; closes 20 August 2026).
2. [CMA, Draft Veterinary Services Market Investigation Order 2026](#).
3. [CMA, Draft Explanatory Note to the Veterinary Services Market Investigation Order 2026](#).
4. [CMA, Draft Schedule 1 - Price List Schedule; Draft Annex 1 - Indicative Price List](#).
5. [CMA, Draft Schedule 4 - Complaint Log \(XLSX\)](#).
6. [CMA, Draft Veterinary Services Market Investigation RCVS Undertakings 2026; RCVS monitoring proposal](#).
7. [CMA, Final decision report: Part B \(remedies\)](#), 24 March 2026, paragraph 3.88 and footnotes 191–192; paragraphs 8.135–8.137.
8. [Enterprise Act 2002](#), sections 136, 161 and 165; Schedule 10.
9. [RCVS, Supporting Guidance: Referrals and second opinions](#), paragraphs 1.3–1.13.
10. [PDSA, PAW Report 2024: Rabbits](#) (insurance and cost data).
11. [PDSA, UK pet populations of dogs, cats and rabbits](#) (2025 estimate: 700,000 pet rabbits).
12. Hop to Save Rabbits, Delivering the Animal Welfare Strategy for Rabbits: Medicine, Diagnostics, Training and Affordability (EFRA Committee briefing, March 2026).

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