

Pennard Vets Response to the CMA Consultation on the Draft Order and Undertakings

August 2026

Dear CMA Vets MI Team,

Thank you for the opportunity to respond to the consultation on the draft Order and Undertakings arising from the veterinary services Market Investigation.

Pennard Vets was established in 1890 and is now an employee-owned veterinary practice serving communities across Kent. Our Articles of Association commit us to considering the impact of our decisions on our people, clients, communities and the environment, alongside the long-term success of the business. These principles were embedded into our governance when we achieved B Corp certification and remain part of how Pennard Vets is run today.

We support the CMA's aim of improving transparency and helping pet owners make informed decisions about their veterinary care.

We have reviewed the detailed response submitted by XLVets and broadly support the concerns it raises. We do not want to repeat those points in detail. Instead, we would like to offer a Pennard Vets perspective based around three principles which we believe should guide the final Order:

1. Transparency must be meaningful
2. Regulation should support informed choice and trust
3. Implementation must be proportionate, practical and sustainable

For us, that comes down to three fairly simple questions:

Does it improve the pet owner's understanding?

Does it help them make an informed choice?

Is it a proportionate and practical way of achieving that?

1. Transparency must be meaningful

We strongly support greater transparency in veterinary care.

But more information does not automatically mean greater transparency. Information needs to be accurate, understandable and given with enough context to be useful.

► Written prescriptions and medicines

We fully support clients being made aware that they can request a written prescription and buy their pet's medicines from another authorised supplier.

Our concern is with wording such as "The same medicines may be significantly cheaper online."

Whether a medicine is cheaper elsewhere depends on the medicine, quantity, supplier, prescription fee, delivery costs and the individual circumstances. We do not think a mandatory national communication should imply that one route will necessarily result in a significant saving.

We would suggest neutral wording such as:

"You can request a written prescription and choose to purchase your pet's medicine from another authorised supplier. Prices can vary, so you may wish to compare the total cost, including any prescription and delivery fees, before deciding where to purchase."

That gives clients the information they need to make their own choice without pointing them in one direction.

We also share the concerns raised about the proposed ongoing medication flyer. The consumer testing carried out by XLVets is small and should be treated as such, but the results are concerning enough that we believe the CMA should carry out its own independent consumer testing before the materials are finalised.

The important question is not just whether clients understand the words on the page. It is what they believe the overall message is telling them.

► Price transparency

We support greater transparency around veterinary fees. Clients should have useful information about the likely cost of their pet's care.

However, a price comparison is only useful when people understand what is actually being compared.

Veterinary care is not always a standard product. The right approach to prevention, diagnosis or treatment depends on the individual animal.

Parasite treatment is a good example. Veterinary practices are increasingly taking a risk-based approach, considering the individual animal, its lifestyle and clinical needs rather than automatically recommending the same preventative treatment to every pet throughout the year.

Publishing an annual parasiticide price for a "typical pet", without clearly defining what that means, could make two very different approaches to preventative healthcare appear directly comparable.

There is also a risk that making standardised prices easier to compare inadvertently encourages more standardised treatment. That would be a poor outcome if a more individual approach is clinically better for the patient.

Price transparency therefore needs enough context for the comparison to be fair and useful.

► Ownership transparency

We particularly welcome the CMA's focus on ownership transparency.

Clients should be able to understand who ultimately owns and controls the veterinary business or service they are choosing.

As an employee-owned veterinary practice, this is particularly important to us. Ownership is not simply a name at the bottom of a website. It can influence how an organisation is governed, how decisions are made and where accountability sits.

If ownership transparency is intended to help people make informed choices, it needs to be understood rather than simply technically disclosed.

We support simple, explicit language such as:

"[Practice name] is owned by [Main Entity]."

The same standard should apply to veterinary practices, referral businesses, online pharmacies and other veterinary services. It should also apply consistently across websites, social media and other public-facing channels.

A pet owner should not have to search Companies House or work their way through different brands and company names to understand who owns the business they are dealing with.

2. Regulation should support informed choice and trust

Veterinary care relies on trust between clients and their veterinary team.

Clients rely on us to explain the options available for an animal that cannot make those decisions for itself. We need to understand the client's circumstances, concerns and priorities so that we can make good decisions together.

Cost is an important and entirely legitimate part of that conversation. We therefore welcome measures that give clients better information and encourage open conversations about choices and costs. There is, however, a difference between informing someone and steering them. This is particularly important with the proposed communications about medicines.

If mandatory communications repeatedly tell clients that medicines may be significantly cheaper elsewhere, there is a risk that the message they hear is not simply "you have a choice", but "your vet is charging you too much".

That would be an unfortunate consequence of a measure intended to improve transparency.

The cumulative client experience

We would also ask the CMA to look at these communications as a client will actually experience them.

A pet owner could receive similar information when they register, visit the practice website, receive an appointment reminder, sit in the waiting room, enter the consulting room, speak to the veterinary team, receive an invoice and then receive information about medication.

Looked at separately, each requirement may seem reasonable. Put them together and the experience may be very different. Repeating the same message does not necessarily make someone better informed. Eventually it just becomes noise.

There is also a danger that important clinical information gets lost as appointment reminders and other communications become longer and increasingly filled with mandatory content.

We would prefer an approach based on appropriate frequency, where practices can show that clients have been clearly informed without having to repeat the same information at every possible opportunity.

The aim should be informed clients, not simply more communications.

Written estimates

We support written estimates and clear conversations about the likely cost of care.

The rules do, however, need to recognise that veterinary medicine is not always predictable.

For a planned procedure, providing a reasonably accurate estimate may be straightforward. For an animal with an undiagnosed illness, the result of one investigation may determine what needs to happen next. The same applies to chronic conditions. A patient may be under our care for many years and their needs, medication and treatment may change during that time.

In these situations, an estimate of expected monthly or periodic costs, updated when the treatment plan materially changes, may be far more useful than trying to predict the cost of the entire course of treatment from the outset.

We also believe first opinion practices should only be expected to estimate the costs of the care they reasonably expect to provide themselves. We cannot accurately estimate or control the charges made by an independent referral provider.

Good cost transparency should encourage an ongoing conversation with the client, rather than create a sense of certainty where clinically there isn't one.

3. Implementation must be proportionate, practical and sustainable

We ask the CMA to consider the combined practical impact of the proposed requirements, not just each requirement on its own.

Every additional administrative task requires someone's time.

Updating websites, practice management systems, client communications, invoices, price information, estimates, posters and regulatory information may each seem like a relatively small task. Together, across a busy veterinary practice, they can create a considerable amount of work.

Veterinary teams have finite time and resources. We want as much of that as possible to be spent caring for patients, talking to clients, supporting our people and improving what we do.

Where information needs to be provided to the RCVS or another body, we would strongly encourage automation and interoperability with practice management systems wherever possible.

If information already exists electronically, people should not have to manually enter and maintain the same information somewhere else.

Printed materials

We also question the need to prescribe particular sizes and locations for printed posters.

Veterinary premises are all different. Something that works well in the waiting room of a large hospital may be completely disproportionate in a small branch or consulting room.

We believe the requirement should focus on the outcome. Information should be clear, prominent and accessible. Practices should then have reasonable flexibility over how they achieve that.

There is also an environmental impact which should not be overlooked. Requiring veterinary practices across the country to print, display, maintain, replace and eventually dispose of large-format posters in waiting rooms and consulting rooms will use resources and create waste.

Our commitment to considering our impact on people and the planet is written into our Articles of Association. We therefore think it is important that the environmental consequences of these requirements are considered alongside their intended benefits for clients.

Where digital or reusable communication can achieve the same or a better result, practices should be able to use it. The important thing is that the client receives and understands the information, not the size of the piece of paper it is printed on.

Conclusion

Pennard Vets supports the CMA's aim of creating a veterinary market where pet owners have clear information, understand their choices and feel able to discuss clinical options and costs openly with their veterinary team.

We believe transparency and trust should work together.

That is why we would encourage the CMA to apply three simple questions to the final Order:

Does this improve the pet owner's understanding?

Does this help them make an informed choice?

Is this a proportionate, practical and sustainable way of achieving that?

Those questions can be applied to written prescription communications, repeated client messaging, printed materials, ownership information, price transparency, written estimates and the administrative requirements placed on practices.

Transparency should mean more than giving people more information. It should mean giving them the right information, with the right context, at the right time, so that clients and veterinary teams can make good decisions together.

Thank you for considering our response.

Yours sincerely,

Pennard Vets