

Wednesday, 19 August 2026

Dear CMA Vets MI Team

We are writing this response on behalf of Shepton Veterinary Group Ltd, an independent, mixed, practice based in Somerset that employs around 72 people across the entire practice.

Response to CMA Consultation on the Draft Order and Undertakings

We thank the CMA team for its considerable work on the Market Investigation and for the opportunity to respond to the consultation.

Shepton Veterinary Group Ltd supports the CMA's overall objectives of improving transparency, increasing consumer awareness and supporting Pet Owners to make informed decisions about their veterinary care. We support the principle behind many of the proposed remedies and believe they have the potential to deliver meaningful benefits for consumers.

Our concerns relate primarily to how some of the remedies are proposed to be implemented. In particular, we believe that certain requirements could go beyond the intended policy objectives, create unintended consequences for Pet Owners and veterinary businesses, and in some cases provide information in a way that is insufficiently balanced or proportionate.

We would like to highlight the following areas.

1. Written prescription literature

We fully support ensuring that Pet Owners are aware of their right to request a written prescription and that they understand they may purchase medicines from alternative authorised suppliers. Our concern is with the proposed standardised wording and the way this information is to be communicated.

In particular, we are concerned about the statement that **"The same medicines may be significantly cheaper online."** While medicines may in some circumstances be available at a lower price elsewhere, this statement presents a comparative pricing proposition without providing the context necessary for Pet Owners to understand when or to what extent this is likely to apply. Prices vary between veterinary practices, online pharmacies and other authorised retailers, and any potential saving may also be affected by prescription and delivery fees.

We therefore believe that a mandatory national notice should provide neutral information about consumer choice rather than imply that online purchasing will generally result in significant savings. We suggest wording along the following lines:

"You can request a written prescription and choose to buy your pet's medicine from an alternative supplier, where it may be possible to make a saving. We'd encourage you to research and compare the total cost, including prescription fees and delivery fees, before deciding where to purchase."



We have similar concerns with the Standard Flyer for Ongoing Medication. The current wording concerning small monthly savings becoming hundreds of pounds over time risks creating an impression of substantial financial benefit without identifying the level of saving, the period over which it would accumulate, or the medicines and prices to which the comparison relates. The accompanying graph further reinforces an impression of increasing savings which is a mathematical inaccuracy that seems entirely inaccurate and should certainly not be applied.

We therefore recommend that the current savings messaging is replaced with a more neutral statement, such as:

“If your pet needs medication regularly, differences in price can add up over time. You may wish to compare the total cost of obtaining the medicine from your veterinary practice and from other authorised retailers.”

We also recommend that the savings graphic is removed. Consumer information should be clear and evidence-based and should not give the appearance of quantified savings where the underlying assumptions and data are not provided.

There are also practical concerns about the proposed requirements for displaying prescribed materials. Requirements for large A2 and A3 notices in waiting areas and consulting rooms do not adequately reflect the considerable variation between veterinary premises. Practices range from small branches to large hospitals, and the prominence and practical impact of a prescribed poster will differ substantially between environments. Many practices are also increasingly using digital communication rather than extensive printed materials, particularly within clinical areas, where reducing unnecessary surfaces can support cleaning and infection prevention.

The requirements would also create additional costs and administration for practices that do not have access to appropriate printing facilities, as well as an ongoing need to monitor and replace materials that become damaged or outdated. A more flexible approach, focused on ensuring that the required information is communicated effectively rather than prescribing precise formats, sizes and locations, would be more proportionate.

We are also concerned about the **cumulative effect** of the proposed communications. Pet Owners may receive similar information through registration communications, websites, appointment reminders, waiting-room and consulting-room notices, invoices, prescriptions and ongoing medication literature. Requiring the same information through every appointment-related communication could result in unnecessary repetition and communication fatigue, particularly where clients have several appointments or pets within a short period.

The available feedback we’ve seen from Pet Owners also suggests that the proposed communications may not always be interpreted as intended. In particular, the ongoing medication flyer appeared more likely to be understood as encouraging Pet Owners to purchase medicines from alternative suppliers rather than simply informing them of their right to choose. There was also a risk of negative perceptions regarding veterinary medicine pricing. These findings reinforce our concern that the wording and presentation should be neutral and balanced.

We therefore encourage the CMA to consider the communications package as a whole rather than assessing each requirement in isolation, and to undertake independent consumer testing

of the complete package before finalising the wording, design and implementation requirements.

2. Transparency of ownership

We fully support measures to ensure that Pet Owners understand who owns veterinary businesses and whether a practice forms part of a wider Group or Network.

We believe, however, that the requirements should explicitly cover **all public-facing digital channels, including social media, and online pharmacies**. Online pharmacies are an important part of the market and, because consumers may have fewer visual cues about ownership than when visiting a physical practice, clear ownership disclosure is particularly important.

The Order should therefore make clear that ownership information must be displayed consistently and prominently across all relevant services and channels.

We also believe that simply displaying a Main Entity name may not always ensure that a reasonable Pet Owner understands that it is the legal owner of the practice. The presentation of the name, including its size, positioning, typography, colour and wording, can affect how it is understood.

We therefore recommend that the Order requires an **explicit ownership statement**, for example:

“[FOP Name] is owned by [Main Entity].”

or, in the case of an online pharmacy:

“[Online Pharmacy Name] is owned by [Main Entity].”

We also recommend that the Main Entity is always displayed using its **full registered name**, including “Limited” where applicable. This would reduce ambiguity and ensure that ownership information is clearly distinguished from branding, marketing or descriptions of a wider network. Our remarks are particularly focused on [REDACTED] where many of our own staff, including registered veterinary nurses, didn’t realise this name was an ownership statement and read it instead as a tagline. This was mainly due to the absence of an ‘owned by’ statement, or the use of the full trading name to include ‘Ltd’.

3. Administrative burden

We are concerned about the proposed requirement for practices to provide information to the RCVS for the Find a Vet website without an automated mechanism for doing so.

While service pricing may be reviewed annually or every six months, medicine pricing can change much more frequently, reflecting changes in net-net medicine costs and the evolving pricing models of veterinary practices.

We strongly encourage the CMA and RCVS to ensure that the process for submitting and updating information is as seamless and automated as possible. This will reduce unnecessary administrative burden and improve the accuracy and timeliness of information provided to Pet Owners.

4. Price lists

We support greater transparency of veterinary pricing through standardised Price Lists, as this can help Pet Owners make informed decisions. However, we remain concerned about the potential for published information to create misleading or artificial comparisons.

For example, the proposed reference to the cost of parasiticides for a “typical Pet” requires further definition. A 10kg dog and a 25kg dog could require different products or quantities, meaning that prices could appear different even where practices are charging comparable amounts for equivalent treatment.

There is also a need to consider the increasing use of **risk-based parasite control**. Veterinary practices increasingly tailor preventative healthcare to an individual pet’s lifestyle, clinical needs and circumstances rather than applying a standardised year-round treatment programme.

Publishing an annual cost for parasiticides could inadvertently encourage comparisons between fixed treatment packages and undermine this more individualised approach.

We therefore encourage the CMA to provide further guidance, including a clear definition of a “typical Pet”, to ensure that published information is genuinely comparable and does not inadvertently encourage standardised treatment where a tailored approach is clinically appropriate.

5. Written estimates

We support the principle of providing written estimates to improve transparency and help Pet Owners make informed decisions. However, the requirements should recognise the realities of veterinary clinical practice.

Clarification would be helpful regarding what constitutes a “**treatment pathway**”. An overall estimate may be appropriate for a planned procedure or discrete episode of care, but many conditions involve an evolving diagnostic process or long-term management where the duration and overall cost cannot reasonably be predicted at the outset.

Similarly, the requirement to provide updated estimates where costs increase by more than 20% or exceed a specified monetary threshold may be difficult to apply to long-term or lifelong conditions. In these circumstances, it may be more meaningful and practical to provide an estimate of anticipated ongoing monthly or periodic costs, with an updated estimate where there is a material change to the treatment plan or expected ongoing costs.

Clarification is also required regarding referral services. A First Opinion Practice cannot accurately estimate costs for services that will be provided by an independent referral provider and should only be expected to estimate costs for services it reasonably expects to provide itself.

Conclusion

Shepton Veterinary Group remains supportive of the CMA’s objectives of improving transparency, increasing consumer awareness and supporting informed decision-making by Pet Owners. We believe that the proposed remedies can deliver meaningful benefits if implemented in a way that is clear, balanced and proportionate.

Our principal concern is that the written prescription communications, particularly the proposed wording and presentation of the ongoing medication literature, risk moving beyond

informing Pet Owners of their options and towards influencing purchasing behaviour. The cumulative effect of repeated communications across multiple mandatory channels should also be carefully considered.

We therefore encourage the CMA to adopt more neutral wording, provide greater flexibility in how information is communicated, strengthen ownership transparency across all relevant channels and ensure that administrative requirements are practical for veterinary businesses.

Most importantly, we believe the remedies should be assessed from the perspective of the **overall consumer experience**. The objective should be to ensure that Pet Owners understand their rights and options and are supported in making their own informed decisions, without creating misleading impressions about pricing or encouraging a particular purchasing route.

We thank you for giving these matters careful consideration.

Yours sincerely,

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On behalf of Shepton Veterinary Group Ltd.

