



Response To Consultation: Vets Market Investigation — Draft Substantive Order & Undertakings

Submitted by VetNear (vetnear.co.uk) · [REDACTED] Founder · August 3rd, 2026

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1. About the respondent and the basis of this response

VetNear (vetnear.co.uk) is an independent, free-to-use price comparison platform for veterinary services, built and operated in the United Kingdom (“UK”). It allows pet owners to search by postcode and compare first-opinion practices by consultation price, distance, and rating. VetNear is not owned by, or affiliated with, any veterinary business.

This response is grounded in operating experience rather than opinion. VetNear currently monitors the public websites of over 5,000 first-opinion small-animal practices (“practices”) across the UK, and displays a standard consultation price for approximately 2,300 of them — collected, classified and refreshed programmatically from information practices publish today. We believe this gives us a unique perspective on the questions the draft order documents must answer: how veterinary prices are actually published online, how reliably that information can be found and compared, and what implementation details determine whether comparison tools will work in practice for consumers.

We strongly support the remedies in the final report. Our comments are confined to the scope of this consultation: whether the drafting achieves the aims of those remedies. In our view it substantially does. However, we’ve identified a small number of drafting points where based on our operating evidence, the current text risks under-delivering the final report’s aims. We also provide some suggested refinements to the draft substantive order and undertakings.

2. Aspects of the drafting we particularly support

- **Draft Order, Article 7(2) and Schedule 1 (standardised service names and definitions).** Standardised, defined services with prescribed inclusions (e.g. consultation durations; vaccination courses including consultation) are the single most important enabler of like-for-like comparison. Our experience of comparing free-text price lists confirms how much ambiguity this removes.
- **Draft Order, Article 7(4)(b) (navigation and metadata).** Requiring the price page to be reachable within one click of the homepage and identified by the words ‘price’, ‘pricing’ or ‘fees’ in navigation and metadata directly addresses a failure mode we observe daily: fee pages that exist but cannot reliably be found. This provision materially improves discoverability for consumers and any tool acting on their behalf.
- **Draft Undertakings, paragraph 4.7(b) (prohibition on paid or promoted ranking).** We operate a strictly neutral ranking (price, distance, rating) and consider the prohibition on pay-to-rank essential to consumer trust in any comparison ecosystem built on the shared data. We support it without reservation, subject to the clarification sought at comment C4 below.
- **Draft Undertakings, paragraphs 4.7–4.11 (Sharing Criteria, approval process and CMA appeal route).** An objective, transparent access regime with an appeal to the CMA is the right architecture for enabling third-party comparison services while protecting data quality and consumers.



3. Comments and suggested drafting refinements

C1 — Draft Order, Article 7(3) – (4) and Schedule 1: the Price List’s publication format is unspecified, permitting formats that defeat direct comparison

Documents and provisions: Draft substantive Order, Article 7(3)(a) and 7(4); Draft Schedule 1; Draft Annex 1.

The drafting standardises the *content* of the Price List (Schedule 1) and its *discoverability* (Article 7(4)), but is silent as to its *format*. As drafted, a practice publishes a compliant Price List by uploading a scanned image or a PDF of a printed poster to a correctly labelled webpage. In our operating experience this is not a hypothetical: among practices that publish prices today, a material proportion do so only as PDFs, images, or content rendered in ways that cannot reliably be read programmatically. Across cities we have audited in depth, between roughly 40% and 60% of first-opinion practices publish no machine-readable price at all, and format inconsistency is a principal cause.

This matters to the final report’s aims because the remedy’s comparison benefits do not flow from publication alone, but from the information being usable — by consumers, by the Find a Vet Platform, and by Approved Third Parties. It matters most in the period before the RCVS data-sharing arrangements are operational (per the Undertakings’ implementation timetable, potentially 12 months or more after Order commencement, while Price List publication obligations are required from three to six months): during that interval, practices’ own webpages are the *only* substrate on which any comparison for consumers can be built.

A format requirement would also be consistent with the CMA’s own recent remedy design. In the road fuel market, the CMA recommended — and now enforces — the statutory Fuel Finder open data scheme, under which retailers must publish price changes in machine-readable, openly licensed form within 30 minutes, precisely so that consumers benefit through third-party comparison tools rather than through publication alone. The lesson of that remedy applies directly here: publication does not deliver comparison; usable formats do.

Suggested refinement: Add to Article 7(4) (or Schedule 1) a format requirement to the effect that the Price List must be published as accessible, machine-readable, text-based web content (for example, an HTML table), and not solely as an image or a downloadable document; and that each listed item should identify the corresponding Schedule 1 service. This imposes no material burden — every mainstream practice website platform produces text-based tables by default — and it secures the comparison aim in all periods and for all users, including those relying on assistive technologies, to whom image-only price lists are equally inaccessible.

C2 — Draft Schedule 1: stable service identifiers would make comparison unambiguous at negligible cost

Documents and provisions: Draft Schedule 1; Draft Order, Article 7(2)(a); Draft Annex 1.

Schedule 1 defines 36 services in five categories, and Article 7(2)(a) requires their customer-facing names to be used. To make matching wholly unambiguous — across minor naming variants, translations (for example Welsh-language sites, which we encounter in practice), and future Schedule revisions — we suggest the Schedule assign each service a stable identifier (for example CP1–CP12, PD1–PD6, and so on), and that published Price Lists and submissions to the RCVS under Article 10 reference that identifier. This is a near-zero-cost drafting addition that removes the residual ambiguity from every downstream use of the data.



C3 — Draft Undertakings, paragraph 4.12: ‘one or more of’ permits a data-sharing solution too stale to satisfy the accuracy standard the Undertakings themselves impose

Documents and provisions: Draft substantive Undertakings, paragraphs 4.7(a), 4.12, 4.13; Draft Order, Article 10(6)(b).

Paragraph 4.12 requires the RCVS to implement ‘one or more of’: a secure API; regular data extracts; live datasets; or existing communication channels. As drafted, infrequent periodic extracts alone would satisfy the paragraph. That sits uneasily with the rest of the package: Article 10(6)(b) obliges businesses to update the information held by the RCVS *before* a revised price is charged, and paragraph 4.7(a) requires the Sharing Criteria to impose standards of ‘accuracy’ on Approved Third Parties. A third party supplied only with stale extracts cannot meet an accuracy standard the data source itself does not support, and consumers comparing prices on out-of-date data are worse served than the final report intends.

Suggested refinement: Specify a freshness standard rather than a menu of mechanisms — for example, that the technical solution must make updates available to Approved Third Parties within a defined period of receipt from businesses (we would suggest no more than one working day), or at minimum at parity with the Find a Vet Platform’s own display. Whether that is achieved by API, live dataset, or frequent extracts can properly be left to the RCVS.

C4 — Draft Undertakings, paragraph 4.7(b): the pay-to-rank prohibition should be tightened to its target

Documents and provisions: Draft substantive Undertakings, paragraph 4.7(b).

We support the prohibition on paid or promoted ranking without reservation. We suggest one clarification of scope. The current words — that no third party may use the data ‘for any paid or promoted ranking process, service or application’ — are capable of a reading wider than the mischief: on a broad construction, a platform that maintains strictly objective rankings but charges practices a fee for an ancillary transactional service (for example, processing an appointment booking a consumer has chosen to make) might be said to operate a ‘paid ... service or application’ using the data. We do not believe that is the intent: the final report’s concern is the integrity of *ranking and prominence*, not the existence of lawful business models that leave rankings untouched — and an access regime reading that broadly would exclude the sustainable, independent comparison services the remedy is designed to enable.

Suggested refinement: Recast the prohibition to target influence over presentation — for example: ‘the Sharing Criteria must ensure that no payment or other commercial arrangement may influence the ranking, ordering or prominence of any veterinary business in any process, service or application using the data’. This preserves the full force of the prohibition while making clear that neutral-ranking services with ancillary revenue models are within the regime.

C5 — Draft Undertakings, paragraph 4.8: prospective third-party users of the data should be named consultees on the Sharing Criteria

Documents and provisions: Draft substantive Undertakings, paragraph 4.8.

Paragraph 4.8 requires the RCVS to consult ‘Relevant Veterinary Businesses and other relevant stakeholders as it considers appropriate’ when producing the Sharing Criteria. As drafted, the parties guaranteed a voice in designing the access regime are the regulated businesses, while the regime’s intended users — prospective Approved Third Parties, including comparison platforms — are



consultees only at the RCVS's discretion. Since the Sharing Criteria and technical solution will succeed or fail on operational details (data formats, update mechanics, service levels) best known to those who will build against them, we suggest paragraph 4.8 name 'prospective Approved Third Parties and other intended users of the data' among the consultees. VetNear would be glad to contribute to that consultation.

C6 — Draft Schedule 1 and Article 8: completing the price transparency framework and providing for its evolution

Documents and provisions: Draft substantive Order, Articles 4(2), 7(2)(e), 7(4), 8, 11, 12, and 22; Draft Schedule 1; Draft Annex 1; Draft Schedules 2–4.

The Price List Schedule's 36 defined services are well chosen: routine, standardisable, and genuinely shoppable. We suggest three refinements to complete the framework and to allow it to develop with the market.

(i) Parasiticide Price Lists should enjoy the same discoverability and format requirements as the Price List. We support Article 8 and the Parasiticide Price List definition without reservation: parasiticides are among the highest-frequency recurring purchases pet owners make. As drafted, however, Article 8 lists benefit only from the general accessibility rule in Article 4(2) (up to two clicks from the homepage), and not from the specific requirements Article 7(4) applies to the Price List — reachability within one click, and identification by the terms 'price', 'pricing' or 'fees' in page navigation and metadata. Nor, unless extended to them, would they be covered by the format requirement we propose at C1. The failure mode we describe there — information that exists but cannot reliably be found or read — applies with equal force here.

Suggested refinement: apply the requirements of Article 7(4), and any format requirement adopted pursuant to our comment C1, to the Parasiticide Price List, whether by cross-reference in Article 8 or by generalising those requirements across Part 2.

(ii) Two additions to the Price List Schedule where consumer detriment concentrates: dental treatment including extractions, and hospitalisation. The Schedule includes dental assessment (scale and polish) but not dental treatment involving extractions — among the most common higher-cost procedures in first-opinion care, and one whose typical cost will frequently meet or exceed the £500 Monetary Threshold at which Article 11 requires a Written Estimate. The draft Order therefore already treats this treatment as significant enough to warrant individual cost disclosure once a Pet Owner is committed to a treatment pathway; adding it to the Schedule would enable comparison before that point, which is where competitive pressure operates. The Schedule's existing architecture accommodates the variability: the component checkboxes in Article 7(2)(e) and the 'typical case' statement required by Article 7(2)(l) exist precisely for procedures of this kind, and the price could be expressed per extraction or in complexity bands on the same basis. Similarly, hospitalisation and monitoring appear in the Schedule only as an inclusion checkbox within surgical prices, and never as a priced item in its own right, despite being a principal component of larger invoices; a per-day or per-night rate is standardisable and directly comparable. Both additions would also reinforce Article 12: an Itemised Bill can only perform the comparison function envisaged by Article 12(3)(b) — enabling Pet Owners to check the prices charged against published price lists — where the services making up the largest bills appear on those lists.

Suggested refinement: add to Schedule 1 (a) dental treatment including extractions, subject to the Article 7(2)(e) mechanism, and (b) hospitalisation (per day / night).



(iii) Schedule 1 should be expressly updateable and periodically reviewed. Schedules 2, 3, and 4 to the draft Order are each expressed to be updateable by the CMA from time to time. Schedule 1 — the schedule most exposed to changes in clinical practice and consumer purchasing patterns — contains no equivalent provision. Whatever its initial contents, a static list risks migrating pricing opacity into unlisted services over time.

Suggested refinement: provide expressly that Schedule 1 may be updated by the CMA from time to time, and commit to a periodic review (for example, every two years) of the defined services against evidence of consumer purchasing patterns, the incidence of Written Estimates under Article 11, and Complaint Log data under Article 22, with services added where that evidence shows significant consumer expenditure falling outside of Schedule 1.

4. Closing

The draft package is, in our view, a faithful and well-constructed implementation of the final report, and the refinements above are offered in the spirit of securing its aims fully in practice. We would welcome the opportunity to assist the CMA and / or the RCVS with practical evidence on any of the points raised — in particular the realities of price publication formats (C1) and the design of the data-sharing solution and Sharing Criteria (C3 – C5), and the scope and evolution of the Price List Schedule (C6).

Best wishes,

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Founder of VetNear

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