Veterinary services for household pets in the UK
VetPartners' response to the CMA's public consultation drafts of the Substantive Order, Substantive Undertakings and related documents dated 20 July 2026
(submitted 20 August 2026)

Introduction

1. VetPartners welcomes the opportunity to comment on the CMA's draft Substantive Documents, published for formal consultation on 20 July 2026.[1] We are pleased to note that the Substantive Documents include a number of positive changes compared with the early drafts, which should help ensure that the remedies set out in the CMA's Final Decision Report (FDR) deliver meaningful benefits to Pet Owners without significant unintended consequences. Accordingly, our comments in this response focus on a few remaining areas of concern, and are not intended to be exhaustive.

2. VetPartners will not comment on all areas of potential inconsistency within the Substantive Documents, or between the Funding Documents and Substantive Documents, as we understand the CMA will ensure consistency within and across all documents in their final versions.

General comments

3. **Timing**: VetPartners understands the CMA's desire to implement the obligations as quickly as reasonably practicable. However, VetPartners has, on various previous occasions, informed the CMA that it would be very challenging for Veterinary Businesses to implement all the obligations within the timeframes proposed in the draft Substantive Documents. The cumulative burden of complying with the large number of obligations will place significant strain on people across the sector, including veterinary surgeons and nurses who, as the CMA has recognised, are already stretched. The final version should, therefore, include an:

    - *Initial grace period* for compliance with each of the individual remedies by the 12-month 'outside date', provided that a Veterinary Business can demonstrate that it is moving as quickly as reasonably practicable to ensure compliance. This is in any event necessary to deal with situations where a Veterinary Business is reliant on third-party service providers (e.g. PMS providers) to achieve full compliance, and to allow Veterinary Businesses sufficient time to coordinate the implementation of the various obligations across their operations in an efficient and cost-effective manner.

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[1] These are the draft Veterinary Services Market Investigation (Substantive) Order 2026 (the "**Substantive Order**") and notice, the draft Veterinary Services Market Investigation Royal College of Veterinary Surgeons (Substantive) Undertakings 2026 (the "**Substantive Undertakings**") and notice, the draft Explanatory Note, and the draft schedules (including Schedule 1 'Price list', Schedule 2 'Standard written prescription notice', Schedule 3 'Standard flyer for ongoing medication' and Schedule 4 'Complaint log') alongside the corresponding Annex 1 ('Indicative Price List') and Annex 2 ('Pet Care Plan Information'), published by the CMA on 20 July 2026 as well as Annex A ('RCVS Monitoring Flowchart') published on 3 August 2026 (together, the "**Substantive Documents**").

- *Ongoing grace period* of six months for any new site or newly acquired Veterinary Business to become compliant with the Order at any time after the final Substantive Order. The Substantive Order does not currently make provision for businesses that are acquired or established after the Order comes into force. For acquisitions, the acquiring Veterinary Business must integrate the new site or business into its existing compliance framework, which requires time to update websites, signage, marketing materials, policies, processes and systems. For newly established sites, the immediate compliance burden would create a significant barrier to entry, as new sites or practices require time to implement the processes and policies needed to ensure compliance. A six-month transition period would address both concerns while ensuring that Pet Owners are protected as soon as practicable but in any event by the time the grace period ends.

4. **Scope**: We note that the Substantive Documents have been updated by the CMA to further clarify that they exclude:

   - *Referral Services (as defined), subject to limited exceptions.* Although this is understood to be a deliberate decision by the CMA, we consider it to be a significant gap in the remedies package, since the more complex referral services were central to many of the concerns raised by Pet Owners in the course of the CMA's investigation. Accordingly, VetPartners would encourage the CMA to revisit this position, either now or at a later stage, to ensure that Pet Owners who use these more complex services also benefit from the protections set out in the Substantive Documents.

   - *Business-to-business services (B2B) provided by and between Veterinary Businesses, and incidental FOP services provided to Pet Owners.* We welcome the guidance in the Explanatory Note regarding incidental services provided by farm and equine businesses. In a similar vein, we would encourage the CMA to include guidance to clarify that the obligations in the Substantive Order relating to Pet Owner Communications apply only *to the extent that* a Veterinary Business is involved in the retail (rather than B2B) provision of Veterinary Services to Pet Owners.[2]

5. **Application**: [✄].

6. **Definition of 'Veterinary Professional'**: VetPartners notes that the definition of Veterinary Professional in Article 2 of the draft Substantive Order includes Veterinary Nurse, which is not currently a protected title. In practice, this creates uncertainty, as what is considered a 'nurse' in one practice may not be considered a 'nurse' in another, and some practices apply the term to employees who are not registered with the RCVS. If the CMA is going to impose legal obligations that apply to Veterinary Professionals, the definition needs to be precise. VetPartners therefore requests that the definition be limited to veterinary surgeons and veterinary nurses who are registered with the RCVS (or a recognised regulatory body).

Part 2: Pet Owner Empowerment

[2] This seems to be implied in the definitions of Pet Owner Communications ("directed at Pet Owners" in Article 4(6)) and of a Veterinary Business ("comprises the retail provision", Article 2), but warrants clarification to achieve the necessary certainty.

Ownership information

7. VetPartners welcomes the updates to the draft Substantive Documents insofar as these apply a 'common sense' logic to what would be considered Clear and Prominent, without seeking to impose an overly technical or one-size-fits-all approach. As a guiding principle, the name of the Main Entity being displayed in a sensible and honest manner will clearly meet the objectives set out in the FDR.[3] Indeed, the FDR made clear that Veterinary Businesses will retain flexibility in how they brand themselves and present information about the Main Entity in their Group or Network, provided that such information is "*prominent, clear and meaningful to Pet Owners*".[4]

8. Beyond this, VetPartners has several residual concerns which we request the CMA to address:

   - **The ownership transparency obligations should not extend beyond Clear and Prominent (Article 5)**: The requirement for the name of the Main Entity to appear "*first*" in Article 5(4)(b)-(d) of the draft Substantive Order should be removed from the final version. This requirement goes beyond the core Clear and Prominent obligation and is problematic for several reasons:

     - *The requirements in Article 5(4)(b) and (d) are inconsistent with the primary Ownership Information obligations and the FDR*. The FDR requires the name of the Main Entity to be published "*before, after or directly next to*" any other name in all cases other than "*search engine results*",[5] and allows Veterinary Businesses flexibility in how they present information about the Main Entity in their Group or Network. [✄].

     - *Veterinary Businesses have limited input into or control over the outcome of the search engine results required under Article 5(4)(c).* The arguments above apply equally to Article 5(4)(d). In addition, Veterinary Businesses cannot ensure that the Main Entity name would consistently appear first in search engine results, so there will inevitably be inconsistency across the sector, which would limit any potential benefits to Pet Owners and may even undermine the broader transparency objectives. Further, Veterinary Businesses could be subjected to onerous RCVS and CMA investigations due to differing interpretations of "*reasonable representations and requests*" to the search engine operator.[6] This would place an unreasonable burden on Veterinary Businesses and lead to wasted costs for the RCVS and CMA, with no obvious benefit to Pet Owners.

     Therefore, VetPartners would ask the CMA to remove this ancillary "*first*" requirement (currently in Article 5(4)(b)-(d) of the draft Substantive Order) from the final version.

[3] VetPartners has provided the CMA with some examples of designs that it believes would satisfy the requirements in the Substantive Documents. See letter from Jo Malone, CEO and Founder of VetPartners, to Martin Coleman dated 2 July 2026.

[4] FDR Part B, para 3.30.

[5] FDR Part B, paras 3.26 and 3.30.

[6] Article 5(5) draft Substantive Order.

- **The Ownership Information should be more clearly limited to the publication of information about the Main Entity (Article 5)**: [✂].

9. **The Practice Information obligations should limit the scope of the qualifications disclosure to aggregated information (Article 6)**: Paragraph 48 of the Explanatory Note acknowledges the safeguarding and privacy concerns related to the publication of detailed information. However, the current approach in the Explanatory Note, which requires individual-level information to be published except where not appropriate, would lead to inconsistency across the sector. The final version of the Explanatory Note should clarify that Veterinary Businesses can satisfy the Practice Information requirements by disclosing the categories of qualifications held at a practice (for example, the number of veterinary surgeons and registered veterinary nurses at each site), rather than individual-level information. This would balance transparency with privacy concerns in a consistent manner and reduce the administrative burden of updating these details. If individuals are comfortable disclosing additional personal information, they remain free to do so.

<u>**Price lists**</u>

10. **The Price List remedy should include safeguards to ensure that Pet Owners are not misled (Article 7)**: VetPartners has previously raised concerns that the draft Price List, though well-intentioned, may not actually enable Pet Owners to adequately compare prices across FOPs. We welcome the requirement under Article 7(2)(e) for checkboxes to indicate which components are included in the price for certain treatments (i.e., dental assessments, castrations and spay procedures), but the draft Price List still includes many other items that are not standardised across practices. Pet Owners could reasonably believe that, because the list was drawn up by the CMA, the services are directly comparable even if they are not. The CMA should therefore mandate a clear disclaimer explaining that price differences may reflect differences in service, scope and clinical approach, and that Pet Owners should speak to their vet for further information. Alternatively, the CMA should extend the checkbox obligations to a larger set of services that are not standardised across the sector.

11. **Some of the publication requirements will lead to unintended consequences (Article 7(3)(c))**: The basic obligations in the draft Substantive Order to ensure that the Price List is available online and on premises will provide Pet Owners with access to price information at all relevant times. The additional requirement under Article 7(3)(c) to include both the consultation price and a link to the Price List in "*the first of any digital communications*" is unnecessary and creates practical difficulties. [✂]. The CMA should therefore clarify that Article 7(3)(c) applies only to automated booking confirmations from online bookings (consistent with the definition of Pet Owner Communications, which is correctly limited to appointment confirmations). Further, Article 7(3)(c) should be amended to require *either* a link to the Price List on the webpage *or* the price of the consultation and any pre-booked services, rather than both, to allow additional flexibility depending on system capabilities.

12. **Veterinary Businesses should have flexibility in how they present pricing information to Pet Owners (Article 7)**: The Price List and Parasiticide Price Lists, including all of the many potential variables, will be lengthy, complex, and difficult for Pet Owners to digest and compare. [✂].

13. **The Parasiticide Price List requirements as drafted cannot be reasonably implemented (Article 8)**: The proposed definition of 'Most Common Parasiticides' requires Veterinary Businesses to record and publish sales data at the individual FOP level, with no upper limit on the number of products to be included. Article 8(2)(b) further requires that the Parasiticide Price List be updated before the revised price is charged to Pet Owners. Parasiticide prices change frequently, as different suppliers update prices at different times. There is therefore a real risk that some FOPs will have a very large number of items on the list which are subject to regular change, requiring significant time and expense to update, publish, and print the list. This would place an unreasonable burden on these FOPs. Accordingly, the Substantive Order should be amended to (i) limit the Parasiticide Price List to the top 10 parasiticides sold by the FOP (which could be achieved easily by removing part (a) of the current definition of Most Common Parasiticides), and (ii) replace the requirement to update the list before each price change with a requirement to review and update the list regularly, but no more than once per quarter. [✂].

<u>**Pet Care Plans**</u>

14. **The Pet Care Plan Standard Information requirements raise various technical implementation challenges (Article 9)**:

- **Volume and complexity of the information to be presented**: [✂]. Further, the high volume of data required is likely to make the Pet Care Plan Standard Information difficult for many Pet Owners to understand and absorb, which risks undermining the core purpose of the remedy. [✂].

- **Indicative parasiticide prices (Article 9(3)(c))**: The requirements of Article 9(3)(c) are unclear as to what exactly is required. As noted above, parasiticide prices change frequently. The Pet Care Plan Standard Information therefore cannot be updated with each price change, and the savings comparison cannot confirm that the indicative standalone price for a "*single Parasiticide*" is the price Pet Owners would pay outside of the Pet Care Plan. The indicative standalone price can only be illustrative, since the specific parasiticides prescribed to each pet will differ based on clinical assessment. Moreover, in line with growing awareness of the environmental and resistance risks associated with over-prescription, Veterinary Professionals are increasingly encouraged to tailor parasiticide treatments to each individual pet's needs rather than prescribe on a routine or blanket basis.[7]

15. **Short-form communications should be permitted for Pet Care Plan marketing (Article 9(5))**: Pet Care Plans offer significant benefits to Pet Owners and their pets. Pet Owners would benefit from greater awareness of the *potential* savings available through these plans. Short-form marketing communications (e.g., text messages or flyers similar to the CMA's Standard Flyer for Ongoing Medication) are effective tools to raise awareness and prompt Pet Owners to engage with the detailed Standard Information. Article 9(5) is in principle a necessary and welcome improvement to the Pet Care Plan obligations. However, it should be further amended to remove the requirement for the information (in Article 9(3)) to be provided in the same place as any additional

[7] See, e.g., House of Lords Environment and Climate Change Committee, *Paws for concern: pets, parasites and pollution* (published 5 August 2026).

information. Without such amendment, Veterinary Businesses would be prevented from using short-form communications effectively to inform Pet Owners of the option to reduce their veterinary costs through Pet Care Plans. The requirement should instead be limited to ensuring that Pet Owners can access the required information when they take further action to sign up to a Pet Care Plan.

Part 3: Choice of Treatments, Referrals and Diagnostics

Written Estimates

16. **The look-back period for Treatment Pathway costs should be shortened (Article 11)**: VetPartners welcomes the updates to Article 11, which help to ensure that the Written Estimate obligation only applies to cases where future costs are reasonably likely to be significant. However, the 12-month look-back requirement would still present practical challenges, as Veterinary Professionals would need to expend a disproportionate amount of time and effort (often during a live consultation within pre-set time constraints) to determine which prior treatments should be included. This burden increases the further back the look-back period extends. [✂].

Part 4: Veterinary Medicines

17. **The objectives of the Veterinary Medicines remedy can be achieved without promotional or inflammatory language** (Article 14(12)-(14)):

    - *Invoice and Receipt Notification wording:* VetPartners has previously raised various objections to the accuracy of the statement proposed to be included in the Invoice and Receipt Notification statement. It is incorrect that medicines are always *significantly* cheaper online than at all FOPs, so the proposed wording is potentially misleading to Pet Owners and unnecessarily inflammatory. The wording should be limited to a short and factual reminder that makes Pet Owners aware of their options and the potential for savings, without the unnecessary promotional rhetoric that is inflammatory and would undermine trust between Pet Owners and their Veterinary Professionals. We propose the following as an example of more appropriate wording: "*Written prescriptions are available upon request. You should compare prices online and at third-party retailers to confirm potential savings.*"

    - *Schedules 2 and* 3*:* The proposed Standard Written Prescription Notice (Schedule 2) and the Standard Flyer for Ongoing Medication (Schedule 3) contain substantially similar language to the proposed Invoice and Receipt Notification discussed in paragraph 17 above and should be similarly updated. In addition, VetPartners is confused and surprised by the unexpected inclusion of the UK Government coat of arms on both Schedules. The use of the official Government emblem on these materials is inappropriate and should be removed as: (i) its use on materials produced pursuant to a CMA market investigation, which is in exercise of an independent statutory function, risks creating a misleading impression that these documents have been directly endorsed by ministers or carry the weight of primary legislation; and (ii) this approach is inconsistent with the CMA's established practice to date, of displaying its own branding on public-facing materials arising out of the market investigations. VetPartners therefore requests that the CMA remove the UK Government coat of arms from both Schedules, which would more accurately reflect the provenance of these materials, maintain consistency with the CMA's standard practice, and avoid unnecessary confusion.

RCVS Undertakings and Monitoring Proposal

18. **The reporting and monitoring obligations should include a materiality threshold (Substantive Undertakings paragraph 3.8; Substantive Order Article 25(4))**: [✄].

19. **The RCVS Monitoring Proposal requires further consultation and clarification (Substantive Undertakings, paragraph 3)**: The monitoring function is an important part of the remedies process and must be refined through proper consultation with stakeholders. The information published as part of the present consultation is insufficient and does not set out a clear plan that has been properly considered and linked to the funding proposal. For example, the proposal lacks clarity on a number of important practical considerations, which are outlined below as questions. We suggest the CMA addresses these in the final version:

    - **Monitoring team expertise**: Will there be consultation regarding the composition of the monitoring team, to ensure that its members are suitably qualified, independent and have the appropriate clinical knowledge to assess evidence such as Written Estimates, consent processes, and other clinical documentation?

    - **Designated contacts**: Will Veterinary Businesses be required to nominate designated contact persons and authorised individuals at the FOP level or centrally (if operating multiple FOPs)? Will the RCVS designate regional contacts, and will there be a formal process for Veterinary Businesses to escalate concerns regarding the handling of individual cases?

    - **Complaint tracking and feedback**: Will complaints received and monitoring outcomes be tracked and recorded systematically? Aggregated data would enable the CMA to identify provisions of the Substantive Order that are unworkable in practice, or that do not serve their intended purpose, and to inform any future review of the remedies package.

    - **Consultation on new processes**: Will the RCVS be required to consult with Veterinary Businesses before finalising new monitoring processes, guidance, or materials? Such a consultation requirement would ensure that the monitoring procedures are practical and proportionate.

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