

Association of Private Pet Cemeteries and Crematoria

Response to the CMA consultation on the draft Veterinary Services Market Investigation Order and Undertakings

Pet cremation provisions – August 2026

Non-confidential

Submitted on behalf of the Association of Private Pet Cemeteries and Crematoria (APPCC)

Note on timing

The APPCC recognises that the formal consultation closed on 20 August 2026. We nevertheless hope that the CMA will be able to take this response into account, so far as practicable, while the substantive Order and Undertakings are being finalised.

Summary

The APPCC supports the CMA's objective of giving bereaved pet owners clearer choices, more transparent prices and greater visibility of their right to make their own arrangements directly with a pet crematorium.

We also recognise the important and compassionate role played by veterinary teams. Our concerns are not directed at the veterinary profession. Clearer requirements would assist veterinary practices as well as pet owners by making it easier for practices to understand what information they should obtain from cremation providers and what they should give to their clients.

The APPCC has previously raised wider concerns about the lack of consistent standards and definitions within the pet cremation sector. The CMA has made clear that this consultation does not reopen the decisions in its final report. We therefore separate those wider concerns from the points where we believe the present draft needs clarification in order to make the remedies already decided work properly.

Our main points are:

1. The scope of the Order in relation to standalone pet crematoria should be made clear.
2. Pet owners should be told the identity and location of the business that will actually carry out the cremation.
3. "Clear information on end-of-life options" must mean more than simply giving a service name and price.
4. The terms "individual cremation" and "communal cremation" should be supported by clear descriptions of the process, because materially different forms of cremation and basic disposal are currently capable of appearing under similar descriptions.
5. The written information used when an owner makes the decision should present the available choices clearly and fairly.
6. Third-party cremation charges, veterinary administration charges and optional additions should be presented clearly.
7. Although the CMA has not chosen to require disclosure of wholesale cremation prices or veterinary margins, that information could be relevant to an owner's understanding of the service and the standards likely to be applied.
8. The RCVS role should relate to veterinary businesses' compliance with the CMA requirements and should not be presented as technical regulation of independent crematoria.
9. The proposed cremation weight categories do not reflect the categories most commonly used by UK pet crematoriums and should be reconsidered.
10. The price-list requirements should also accommodate rabbits, birds, rodents, reptiles and other household pets.

1. The wider concern that remains unresolved

The CMA remedies provide some important safeguards. Veterinary businesses will have to provide clearer prices, explain end-of-life choices and make pet owners aware that they may arrange directly with a crematorium.

However, these measures largely regulate **how the service is sold**, rather than defining **the service itself**.

The final report does not establish a minimum meaning for individual cremation, a minimum standard for communal cremation, an identification or traceability system, or a requirement governing the ultimate destination of combined cremated remains.

There is therefore a risk that two very different services can appear under exactly the same heading on a price list.

Put simply, it is rather like requiring a housebuyer to be given the price of the house and every optional extra without defining how the house itself should be built. The price may be transparent, but that does not necessarily tell the buyer what they are purchasing.

The APPCC recognises that the CMA does not intend to revisit this part of the final report through the present consultation. We therefore record this as our continuing concern rather than asking the CMA to introduce a new system of crematorium regulation at this stage.

Animal Funeral Services

Events since publication of the final report demonstrate why this concern remains important.

In July 2026 a multi-agency investigation was opened into Animal Funeral Services in Herefordshire. Public reporting stated that APHA issued a stop notice on 9 July while examining multiple concerns.

The APPCC does not prejudge that investigation or suggest that veterinary practices knowingly misrepresented any service.

Its relevance is the uncertainty created for pet owners and veterinary practices when questions arise about where pets were taken, how they were handled, what service was actually provided and whether the reality corresponded with the description given when the service was purchased.

This illustrates why price transparency alone cannot resolve every consumer-protection issue surrounding pet cremation.

2. Points arising from the draft Order

2.1 Does the Order apply to standalone crematoria?

The background to the Order refers to adverse effects on competition in first-opinion veterinary practice and outsourced out-of-hours services.

However, the definitions of “Veterinary Services” and “Veterinary Business”, together with Article 7’s express reference to crematoria, appear capable of bringing a standalone crematorium selling directly to pet owners within parts of the Order.

A standalone pet crematorium does not provide veterinary treatment and would not normally regard itself as a veterinary business.

The APPCC asks the CMA to state clearly:

- whether standalone crematoria selling directly to pet owners are covered;
- which Articles apply to them;
- whether all direct-to-consumer crematoria are intended to be covered;
- whether wholesale crematoria dealing only with veterinary practices are treated differently; and

- how this wider application relates to the competition concerns identified in the FOP and OOH markets.
- If independent crematoria are intended to be directly covered, a separate term such as “Cremation Service Provider” may be clearer than describing them as Veterinary Businesses.

2.2 Clear information must mean more than a price

The background to the Order refers to providing pet owners with **clear information on end-of-life options**.

Article 20 also requires the owner to receive written information about what is included in the cremation service before making a decision.

At the same time, the standard price-list provisions restrict free-text descriptions and use the simple headings “communal cremation” and “individual cremation”.

Those headings alone do not tell the owner enough to understand the service.

The APPCC is not suggesting that a price list should contain detailed technical procedures. A simple structured description or link could state the principal features, for example:

- whether the pet is cremated alone or with other animals;
- how pets are placed where more than one animal is cremated together;
- whether individual ashes will be returned;
- what happens to combined remains following communal cremation;
- whether collection and transport are included;
- whether a basic ashes container is included; and
- who will physically carry out the cremation.

This would give effect to the CMA’s existing requirement for clear information without introducing a complete new system of technical regulation.

2.3 Individual cremation, communal cremation and basic disposal

The CMA uses “individual cremation” and “communal cremation” as standard price-list headings. For those prices to be meaningfully compared, pet owners need to understand what those descriptions mean in practice.

The APPCC has long-established definitions which distinguish between genuinely different forms of pet aftercare.

Under the APPCC definition, **individual cremation** means that:

- **the pet is cremated alone in an enclosed chamber; and**
- **after cremation, all visible remains are carefully collected before another cremation takes place.**

These are important characteristics of the service from the pet owner’s perspective.

The owner is not simply purchasing the return of a quantity of cremated remains. They are purchasing a service in which their pet is cremated alone and all visible remains from that individual cremation are collected.

Under the APPCC definition, **communal cremation** means that:

- two or more pets are cremated together;
- the pets are placed side by side, rather than piled on top of one another;
- individual ashes cannot be separated or returned; and
- the owner is told what will happen to the combined cremated remains.

This is materially different from a basic collective disposal process in which large numbers of animals may be transported and stored in bulk, loaded into a large incinerator to capacity, placed on top of one another and incinerated together, with the resulting residue subsequently disposed of.

Both may involve more than one animal being processed together, but they are very different services from the perspective of a bereaved pet owner.

The APPCC is not suggesting that owners should be prevented from choosing a basic and economical disposal service. Some owners may be entirely comfortable with that option.

The important point is that it should be described accurately and should not be presented in a way which leads an owner reasonably to believe that they are purchasing the same form of respectful communal pet cremation described by the APPCC.

The distinction is therefore not simply about terminology. It concerns:

- the handling of the pet;
- the way pets are placed for cremation;
- the cremation process; and
- what happens to the resulting remains.

The APPCC recognises that the CMA may regard detailed operational standards as going beyond the final report. Nevertheless, if the same standard headings are used for materially different services, prices cannot be meaningfully compared unless enough information is provided to explain those differences.

At the very least, the CMA should permit or require a short factual description stating:

- for individual cremation, whether the pet is cremated alone in a chamber and how the visible cremated remains are recovered; and
- for communal cremation, how the pets are placed for cremation and what happens to the combined remains.

This would allow pet owners to compare like with like without requiring the CMA to introduce the full APPCC Code as a regulatory standard.

2.4 Identity of the actual crematorium

Article 7 appears to require a link to a third-party crematorium's price list only where the veterinary business provides no element of the cremation service.

That may cause difficulty with the normal arrangement under which a veterinary practice:

- receives the owner's instructions;
- takes payment;
- holds the pet;
- completes paperwork; or
- arranges collection,

while a completely separate business carries out the cremation.

The owner should be told the **name and location of the business that will physically perform the cremation**, irrespective of whether the veterinary practice also provides an administrative or handling element.

The APPCC asks the CMA to amend or clarify Article 7 accordingly.

This would also make direct price comparison possible and give veterinary practices a clear rule to follow.

A pet owner should not be expected to purchase an aftercare service without knowing where their pet is going.

2.5 The written decision process

The owner may be making these arrangements immediately before or after euthanasia and may rely heavily on the veterinary practice for guidance.

The available options should therefore be presented clearly and without one option being made to appear the automatic choice.

The written information used at the point of decision should explain, where relevant:

- individual cremation;
- communal cremation;
- any basic collective disposal option where offered;
- the option of arranging directly with a crematorium; and
- lawful home burial.

It should also identify the provider, state the price and explain the principal features of the selected service.

This need not require a lengthy document. A simple and consistent format would help veterinary practices and owners alike.

2.6 Third-party charges, wholesale prices and itemised bills

The APPCC supports clear billing but recognises the need for sensitivity when dealing with euthanasia and cremation.

Sensitivity should affect **how** information is presented rather than allowing material information to disappear.

Where applicable, the owner should be able to identify:

- the cremation service purchased;
- the total amount charged;
- optional additions; and
- any separately charged veterinary administration, arrangement, handling or transport fee.

The APPCC recognises that the CMA has not chosen to require disclosure of a crematorium's wholesale charge or the veterinary business's profit margin, and we are not asking for that decision to be reopened through this consultation.

However, we believe this information would be relevant to a pet owner's decision.

The wholesale price charged by the crematorium can provide useful context about the service being purchased. It does not by itself prove the standard of that service, and a lower wholesale price does not automatically mean that a poor service is being provided.

Nevertheless, the cost of providing a cremation service is influenced by the way it is operated.

For example, a service involving individual handling, secure identification, appropriate storage, individual cremation, careful recovery of all visible remains and appropriate presentation of the ashes necessarily involves time, staff, equipment and operating costs.

Likewise, a respectful communal service in which pets are handled individually, placed side by side and the combined remains are recovered and placed in a pet cemetery or memorial area is materially different from a high-volume disposal operation.

A very low wholesale cremation price may therefore reasonably prompt an owner or veterinary practice to ask what level of handling, identification, storage, cremation and recovery can economically be provided for that amount.

At the other end of the transaction, a pet owner paying a substantially higher retail price may reasonably assume that the additional cost reflects additional care, safeguards or service standards. In reality, part of that difference may simply represent the veterinary business's commercial margin or administration charge.

Greater visibility of the wholesale price and the veterinary margin would therefore give the pet owner additional information with which to assess what they are purchasing and to ask appropriate questions about the standards being applied.

The APPCC accepts that mandatory disclosure of wholesale prices and profit margins was not included in the CMA's final remedies. We therefore do not present this as an amendment that must now be made to the Order.

We do, however, believe it is important to record that such information would have genuine relevance to informed consumer choice and could assist owners in understanding whether substantial differences in retail prices reflect differences in the underlying aftercare service.

Within the present Order, the minimum requirement should be that where an amount is presented as the charge for a third-party cremation service, it must not create the impression that this is necessarily the crematorium's own direct charge if it is actually a retail price determined by the veterinary business.

Any separately charged veterinary administration or arrangement fee should also be clearly identifiable.

2.7 Consumer-protection responsibility and complaints

Compliance with the CMA Order should not be regarded as replacing ordinary consumer-protection law.

Where a veterinary business describes, recommends, arranges or sells another business's cremation service, the accuracy of the information it gives to the pet owner remains important even though another business physically carries out the service.

Complaints about a veterinary business's own sale or administration of the service should therefore be distinguished from complaints concerning the practical operation of the independent crematorium.

For example:

- failure to explain available choices or prices is a matter concerning the veterinary business;
- incorrect administration or failure to pass on instructions may concern the veterinary business;
- misleading representations concerning the service offered may engage ordinary consumer-protection law; and
- handling, identification, storage, cremation and ash recovery by an independent provider principally concern that provider and ordinary consumer-protection enforcement.

The distinction should be clear in the complaints and monitoring arrangements.

3. RCVS monitoring

The RCVS monitoring proposal refers to "cremation provision".

The APPCC understands the intended role to be monitoring whether veterinary businesses comply with the CMA's pricing, information and choice requirements.

That is different from assessing the technical operation of an independent pet crematorium.

The RCVS should not inadvertently be presented as the regulator or inspector of crematorium procedures.

This distinction is particularly important because veterinary regulation and animal-by-product regulation do not assess the same matters as a specialist crematorium inspection.

APHA approval is a legal requirement where applicable, but it concerns compliance with animal-by-product and related requirements. It should not be presented as independent verification of the wider consumer service, including standards of handling, dignity, individual cremation, communal cremation, identification, ash recovery or communication with bereaved pet owners.

The APPCC asks the CMA to make this distinction explicit.

If standalone crematoria are themselves to be brought within RCVS monitoring for particular obligations under the Order, the scope of that monitoring should be stated precisely and confined to those obligations.

4. Cremation prices and weight categories

The APPCC has also reviewed the weight categories currently used by UK pet crematoriums.

This is important because the proposed standard categories do not appear to correspond closely with normal crematorium pricing practice.

The CMA categories are broadly:

- cat / small dog under 10 kg;
- dog 10–25 kg;
- dog over 25–40 kg;
- dog over 40–60 kg; and
- dog over 60 kg.

4.1 Review of published crematorium price lists

A review of 21 published UK pet crematorium price lists found the following principal weight breakpoints:

Weight breakpoint	Crematoriums using it	Percentage of sample
10 kg	17 of 21	81%
20 kg	15 of 21	71%
40 kg	12 of 21	57%
30 kg	9 of 21	43%
60 kg	7 of 21	33%
25 kg	6 of 21	29%
35 kg	6 of 21	29%
50 kg	6 of 21	29%

The clearest findings are:

- 10 kg is an established first dog breakpoint;
- 20 kg is much more commonly used as the next breakpoint than 25 kg;
- the complete 10–20 kg band appeared in 13 of the 21 price lists reviewed; and
- the CMA's complete 10–25 kg band appeared in only 2 of the 21.

This was a practical review of published price lists rather than a statistical survey of every UK crematorium, but the difference is sufficiently marked to suggest that 25 kg is not the normal second breakpoint used by the sector.

Examples include:

Crematorium	Published dog categories
Dignity Pet Crematorium	up to 10 / 10.1–20 / 20.1–34 / 34.1–47 / 47.1+ kg
Procure Pet Cremations	up to 10 / 10.01–20 / 20.01–35 / 35.01+ kg
Sunnyside Pet Cremation	under 10 / 10–20 / 20–30 / 30–40 / 40–50 / 50–60 / 60+ kg
Precious Paws	0–10 / 10.1–20 / 20.1–30 / 30.1–40 / 40.1–50 kg
Evermore Pet Cremation	up to 10 / 10.1–20 / 20.1–30 / 30.1–40 / 40.1–49 kg
Glasgow Pet Cremations	under 10 / 10.1–20 / 20.1–40 / 40.1–60 / 60.1–80 kg

4.2 Cats

Many crematoriums publish a **separate cat price** rather than combining all cats with small dogs.

The APPCC believes that is the clearer approach.

There should, however, be flexibility for larger cats. Larger breeds are increasingly common, and some cats can exceed the weight of a typical cat by a considerable margin.

A standard cat category could therefore sensibly apply up to **7 kg**, with a cat above that weight placed into the appropriate weight category, beginning with the first dog category.

For example:

- Cat – up to 7 kg
- Small dog / larger cat – over 7 kg to 10 kg
- 10–20 kg
- 20–40 kg
- 40–60 kg
- over 60 kg

A provider should also be permitted to subdivide the 20–40 kg band into 20–30 kg and 30–40 kg where that reflects its normal charging structure.

This would more closely reflect current crematorium practice while retaining a relatively simple standard format.

4.3 Other household pets

The CMA categories also need to accommodate pets other than cats and dogs.

Pet crematoriums routinely deal with:

- rabbits;
- guinea pigs and other rodents;
- birds;
- reptiles; and
- other small companion animals.

The final requirements should confirm that providers may add suitable species categories or use clear weight-based categories for these pets.

5. APPCC's requested clarifications

1. Clarify the scope of the Order for standalone direct-to-consumer crematoria and wholesale cremation providers.
2. Identify the actual cremation provider whenever another business physically performs the service.
3. Provide a practical way of describing what is included in individual and communal cremation services alongside the standard price information.
4. Allow the APPCC-type distinctions between individual cremation, respectful communal cremation and basic collective disposal to be communicated clearly, so that materially different services are not made to appear equivalent.
5. Ensure that individual cremation information can state that the pet is cremated alone in a chamber and that all visible remains are collected.
6. Ensure that communal cremation information can state that pets are placed side by side and explain what happens to the combined remains.
7. Ensure the written decision process presents the available end-of-life choices clearly and fairly.
8. Clarify billing requirements so that material charges are visible without requiring insensitive detail.

9. Recognise that greater transparency over wholesale cremation charges and veterinary margins would provide useful information to pet owners, even though such disclosure is not part of the remedies currently proposed.
10. Distinguish the veterinary business's responsibilities from those of the independent crematorium for complaints and consumer-protection purposes.
11. Confirm the limits of RCVS monitoring, particularly in relation to the technical operation of independent crematoria.
12. Reconsider the prescribed cremation weight bands, in particular replacing the comparatively uncommon 25 kg breakpoint with the much more widely used 20 kg breakpoint.
13. Allow a separate standard cat price, with larger cats above approximately 7 kg capable of falling into the appropriate weight category.
14. Permit suitable categories for other household pets, including rabbits, rodents, birds and reptiles.

6. Conclusion

The APPCC supports the CMA's aim of improving transparency and choice.

Pet owners may legitimately choose very different forms of aftercare.

Some will want an individual cremation in which their pet is cremated alone and all visible remains are carefully recovered.

Some will want a communal cremation in which pets are treated respectfully, placed side by side and the combined remains are subsequently placed in an appropriate pet cemetery or memorial area.

Others may be content with a simple and economical collective disposal service.

The purpose of regulation should not be to dictate that choice.

It should ensure that, **before an irreversible decision is made**, the owner understands:

- what service is being offered;
- what actually happens to their pet;
- who will provide the service;
- where their pet will go;
- what is included;
- what the service costs; and
- what will happen to the resulting remains.

The CMA's proposals are an important step towards price transparency. However, price information is only meaningful if consumers can compare services which are accurately described.

The clarifications suggested above would help veterinary practices, cremation providers and pet owners have the same understanding of the service being purchased and would reduce the risk of materially different services being presented as if they were equivalent.

The APPCC would be grateful if these points could still be considered while the final substantive Order and Undertakings are being prepared.

References

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