

Response to CMA consultation on draft substantive Order and Undertakings, published on 21 July 2026

About this document

This document forms the response from the Royal College of Veterinary Surgeons (RCVS) to the Competition and Markets Authority (CMA) consultation on the draft substantive Order, undertakings and related documents, as published on 21 July 2026.

Format

The document is structured in two parts:

- a. Part one: Summary statement
- b. Part two: Tables with specific comments against the documents that are the subject of this consultation.

Further information

For further information, please contact the RCVS CEO, Lizzie Lockett, at [REDACTED]

Part one: Summary statement

1. In its Final Decision Report, the CMA found adverse effects on competition in the market for veterinary services for household pets. Veterinary professionals work in many fields with many species to protect animal health and welfare and public health. Most veterinary professionals are engaged in caring for and treating household pet and the public has confidence in veterinary professionals to provide good care for their pets. Pricing in this market is primarily dictated by unregulated veterinary businesses and we welcome the publication of these documents which set out the framework for how the CMA propose to address the competition concerns in this market, and the involvement of the RCVS in that work. The RCVS expects that the package of remedies that the CMA proposes for veterinary businesses will help to maintain the confidence in the individual professionals that are regulated by the RCVS.
2. The RCVS is best placed, as the regulator in the veterinary sector, to monitor the compliance of practices with the CMA's requirements and we have agreed in principle to do so. We believe that this will be the most cost-effective way of monitoring the requirements, using our knowledge of and relationship with the sector to good effect. We continue to regularly engage with the CMA since the publication of the Final Decision Report (FDR) and we are pleased that the relationship between the RCVS and CMA is collaborative and positive.

3. We welcome the decision by the CMA to first make the Funding Order and accept related undertakings from the RCVS, prior to the substantive remedies being implemented. This will allow us to establish the infrastructure needed for both monitoring of remedies and publication of information about veterinary practices that will give consumers the best information when choosing veterinary care for their pets. This timing will put us in a good position to meet the timescales proposed by the CMA for implementation of the substantive remedies and start to address the issues identified by the CMA Final Decision Report as soon as possible.
4. The monitoring proposals put forward by the RCVS in collaboration with the CMA are, we believe, a proportionate way of monitoring compliance with the CMA's requirements and align with the CMA's proposals in the FDR for the monitoring regime to be light touch. We envisage that we will undertake the activity required to monitor compliance by making enhancements to our existing business and IT structures, which, we believe is the most efficient and cost-effective way of monitoring compliance for veterinary businesses and therefore for consumers.
5. As the Government moves to consider new legislation governing veterinary services to replacing the aging Veterinary Surgeons Act 1966, we consider the RCVS will be in a good position to engage in wider regulation of veterinary practices. The CMA remedies reinforce the importance of treating animal owners and keepers as clients of veterinary professionals fairly, and the RCVS recognises and welcomes that the fair treatment of consumers is likely to form part of the RCVS's objectives under any reformed legislation.
6. The documents that the CMA are consulting on are broadly in line with the provisions of the FDR and are generally in line with our expectations. We have some specific comments on some of the documents outlined below.

Draft substantive Order

Par./Art.	Wording	RCVS response
2	"Parasiticide" and "Parasiticide Price List"	<i>Parasiticides should be only those used for 'household pet' species.</i>
21(1)	Any update will be notified by email to Veterinary Businesses by the RCVS and on the RCVS website	<i>Although it is likely that we would communicate with practices by email, broadening the ways that the RCVS can communicate with practices would enable more effective communication with a wide range of practices.</i>
23(5)(b)	<i>other forms of investigation are ongoing in relation to the same Complaint and the ADR provider has decided that mediation should be delayed until a reasonable time has been allowed for any other investigation to conclude.</i>	<i>Other investigations may be ongoing in relation to the same issues that are raised in the complaint, rather than the same complaint.</i>

Draft schedule 4 complaint log

Par.	Wording	RCVS response
"Look ups"		<i>There are a very large number of sub categories for reporting. This is likely to lead to a large number of questions directed at the RCVS regarding the correct category, and is likely to be too detailed for the purposes for which the data is collected.</i> <i>We would suggest fewer and broader categories which is likely to lead to better data gathering. One complaint should generate one entry. If the complaint straddles a number of areas, then we would suggest that the business is asked to identify the main subject of the complaint.</i> <i>We would also suggest that it would reduce the number of queries if guidance on how to complete the log was included on the form itself, perhaps enhanced with standalone guidance if required.</i>