

Issues Statement response

Which?'s response to the CMA's Issues Statement for its Market Investigation into the supply of veterinary services for household pets in the UK

Which? recognises the areas of concern listed in the Issues Statement, which are closely aligned with our own, and therefore supports the CMA's focus for the Market Investigation into the supply of veterinary services.

As the CMA will know, many of the areas of concern reflect the issues identified by our own research last year, which were included in our response to the Market Investigation Reference consultation on 11th April 2024. Those include concerns around an information deficit for pet owners, concentrated local markets and high costs for veterinary medicines.¹ We also welcome the scope specifically includes issues that we identified in our consultation response, namely concerns that:

- The mechanisms for pet owners to make complaints and receive redress when things go wrong may not be adequate;
- The regulations around prescribing veterinary medicines could be pushing up prices for consumers.

Regarding complaints, we are concerned that where a complaint cannot be resolved directly with a veterinary practice, there may be inadequate mechanisms to support pet owners to take their complaint further and resolve it fairly.

We understand that the RCVS deals only with the most serious concerns regarding professional conduct, such as fraud, criminal convictions and very poor professional conduct.² Consumer issues around the service they receive and potential cases of negligence are not covered by the RCVS and pet owners are instead directed to the Vet Client Mediation Service (VCMS). However, we understand that the VCMS is a voluntary service, so practices must agree to their involvement. Furthermore, whilst they can assist pet owners in communicating with the veterinary practice to aid reaching a resolution, they have no legal powers to compel practices to do anything to resolve the complaint and as such pet owners have no clear place to go where a complaint is not adequately resolved in this way.

¹ Which? (2023), [Consumer harm in veterinary services](#)

² RCVS, [I want to raise a concern about a veterinary surgeon](#)

Complaints and redress in the veterinary market is an area that Which? intends to explore further with primary research with consumers to understand the issues that exist and therefore the potential remedies, and we will share our findings with the CMA.

We share the CMA's concern that pet owners may lack the appropriate information to engage effectively in the market and we anticipate that there will be remedies to improve the transparency of both practice ownership and prices.

Whilst transparency of practice ownership could be addressed in a fairly straightforward manner, we appreciate that the complex and situation-dependent nature of veterinary treatment makes improving price transparency more difficult. However, we believe that prices for a range of standard consultations, diagnostics and treatments could be provided to assist pet owners with the necessary information to compare prices between practices.

When conducting our research we observed that some veterinary practices do provide prices for basic services,³ demonstrating the possibilities for price transparency across some services. We also observed that for pet plan costs, practices often list price for different weights of dogs,⁴ indicating that practices have fairly simple existing categorisations for pricing services for different pets. We think it likely that practices would be able to provide a price list searchable by animal and weight that would include standard treatments and diagnostics, and that this could facilitate the development of price comparison tools. We recognise, however, that there is a need to consider potential unintended consequences that could arise from price transparency remedies. For example, practices could focus on providing competitive prices for services with prices they are required to list, but push up prices for other services.

We generally welcome the CMA's intended approach to considering outcomes in this market. In particular, we are pleased that there is an explicit focus on innovation and we expect this assessment will be crucial to developing recommendations to the government with respect to changes to the regulatory framework.

However, we also note that the CMA believes it may not be necessary to undertake an in-depth assessment of quality of treatment outcomes and that it may be sufficient to consider whether pet owners are offered choice and receive partial advice. We think this would be a missed opportunity and encourage the CMA to go further. It is undoubtedly true that it will be challenging to make objective assessments of the quality of veterinary care. Indeed, this is a fundamental challenge facing consumers whenever they choose a veterinary practice or treatment option. When analysing indicators of quality of treatment to assess whether there is an adverse effect on competition, **the CMA could consider which indicators might be the most meaningful measures of quality.** This would inform which information could be placed in the public domain (paragraph 137). Information asymmetries about quality are inherent in markets where professional services are provided, but considerable efforts have been made to address this in health services. It would be helpful if the CMA could advise which of the many indicators of quality used in healthcare could be reasonably adopted for veterinary services.

We believe that within the scope detailed in the CMA's Issues Statement, the market investigation can deliver a substantial benefit to pet owners and veterinary practitioners alike. Which? will continue its work on veterinary services as the market investigation progresses,

³ Example [price list from Thistle Vets](#)

⁴ Example of [pet plan prices by weight from Hallam vets](#) (part of IVC)

looking to represent the consumer perspective and provide useful advice to pet owners. We will be happy to engage with the CMA to share data and insights as and when it would be helpful over the course of the market investigation.

About Which?

Which? is the UK's consumer champion, here to make life simpler, fairer and safer for everyone. Our research gets to the heart of consumer issues, our advice is impartial, and our rigorous product tests lead to expert recommendations. We're the independent consumer voice that works with politicians and lawmakers, investigates, holds businesses to account and makes change happen. As an organisation we're not for profit and all for making consumers more powerful.

For more information contact

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