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Unite the union (BVU) response to the Competition and Markets Authority's investigation into the supply of Veterinary services for household pets - provisional decisions

Executive summary

- **BVU welcomed the CMA report¹ into the supply of Veterinary services for household pets as a positive step forward.**
- **More action is needed, however, on transparency, regulation and legislation.**
- **The BVU is calling for:**
 - **Mandatory practice regulation, similar to the Care Quality Commission (CQC) in human healthcare.**
 - **The introduction of an updated Veterinary Surgeons Act, to ensure the regulatory framework can be improved to include mandatory practice regulation and to protect the title "Veterinary nurse".**
 - **Greater transparency on veterinary ownership and business practices.**
 - **A levy on veterinary businesses to be used to monitor their fulfilment of the CMA order by the Royal College of Veterinary Surgeons (RCVS).**
 - **Reform of the Cascade system.**
- **Remedies must be implemented in such a way as to protect veterinary staff from further exploitation, deepening poverty pay, as well as avoiding any additional administrative burdens resulting in further unpaid overtime.**

1. The British Veterinary Union (BVU) is a national professional branch of Unite the Union, the largest trade union in the UK and Ireland.
2. The BVU is the only dedicated trade union for the Veterinary sector, representing workers across all grades and job titles within the sector. These include, but are not limited to, administrative workers, cleaning workers, managerial workers, receptionists, Registered Veterinary Nurses (RVNs), student Veterinary Nurses (SVNs), Veterinary care assistants, Veterinary medicine students and Veterinary Surgeons.

¹ BVU Press release on the report here: <https://www.uniteunion.org/news-events/news/2025/october/british-veterinary-union-calls-for-more-action-to-address-issues-in-sector>



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3. The BVU believes that the UK Veterinary industry is facing a crisis of soaring pet care costs for customers, unsafe working conditions and workloads that are far too high.
4. The BVU submitted a substantial response to this investigation² and it is positive that many of the concerns raised have been engaged with.
5. The BVU therefore welcomes the majority of the Competition and Markets Authority (CMA) provisional remedies but believes that more action is needed to effectively address the issues present in the UK Veterinary sector. There are particular concerns over areas including transparency, regulation, and medicines legislation.
6. Many of the remedies set out by the CMA decisions, such as itemised billing and written estimates of cost, are already in place across most veterinary practices.
7. The BVU are pleased to hear the acknowledgement that the current regulatory framework “*fails to regulate the part of the system that gives rise to the greatest concerns*” – namely the lack of mandatory regulation for veterinary practices and businesses.
8. The BVU is calling for mandatory practice regulation, similar to the Care Quality Commission (CQC) in human healthcare – we believe this system is understood by the public and would give rise to greater confidence from pet owners. It would ensure accountability for veterinary businesses where company culture, policy or practice affects decision making, rather than frontline Veterinary workers being held accountable for decisions outside their control.
9. The BVU strongly supports the call from the CMA to government for an updated Veterinary Surgeons Act, in order to ensure the regulatory framework can be improved to include mandatory practice regulation. We would also expect any new legislation to protect the title “Veterinary Nurse”.
10. We do not believe the requirement for veterinary businesses to have “*written policies to ensure that vets and vet nurses are able to act in accordance with those parts of the RCVS codes of professional conduct and supporting guidance that relate to providing pet owners with independent and impartial advice and appropriate and timely information about treatment options and prices*” is likely to have a material impact on the ability of those vets and vet nurses to do so.

² https://bvu.org.uk/wp-content/uploads/2025/05/BVU-response-to-the-CMA-Provisional-Remedies-Paper-23_05_2025.pdf



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11. The union sees many examples of veterinary businesses not following their own written policies, and we believe that practice culture is often a greater driving force; many of the current policies which our members consider problematic in their practices are not written in such a way as to clearly obstruct veterinary professionals from acting in accordance with their Royal College of Veterinary Surgeons (RCVS) obligations, but the implementation of such policies does lead to this outcome. Therefore, as we have previously stated, it is of key importance that any practice regulation system is outcome focused, rather than a tick box exercise of having the right policies in place.
12. The BVU is also supporting the remedy for a fixed maximum prescription charge, however, there is concern that around the remedy wording about providing prescriptions at the time of consultation or emailed the same day. There must be provisions in place to prevent prescription fraud and given the current lack of a national veterinary prescription infrastructure, this must include practices being able to send prescriptions directly to a pharmacy of the pet owner's choice.
13. More must be done alongside these measures to ensure that pet owners are aware of the links between veterinary practices and online veterinary pharmacies, where many are owned by the same large corporations.
14. We must also be careful that practices are incentivised to provide additional administrative time for workers in light of these remedies. We already see a situation where workers end up forced to work unpaid overtime in the sector, in order to fulfil their RCVS obligations which their employer does not make provision for. It is plausible that some of these remedies could see workers undertaking further unpaid overtime to meet CMA obligations – an easy way for veterinary employers to shirk some of the costs of the CMA order.
15. The BVU has consistently called for “Fair fees, Fair pay, Smaller profits” and the report makes it clear that veterinary businesses have demonstrated robust profits in the information shared with CMA.
16. We must ensure the narrative to the public is clear – veterinary workers are also being exploited by this system, and poverty pay is rife in the sector, in particular for workers in reception, veterinary care assistant, and student nursing roles. We have also seen real terms pay cuts even for the better paid members of the veterinary workforce, and the CMA report makes it clear that whilst veterinary businesses (and other veterinary bodies) claim that increased wages are to blame for increased fees, they have not been able to provide sufficient evidence to the CMA for this claim.
17. For example, earlier CMA working papers shared that *"analysis suggests that treatment prices increased by over 60% between 2015 and 2023, compared to general inflation for*





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services of 35%, and an increase in vet salaries of 20-34%". This shows that vets salaries have decreased in real terms over this time period, and that the increased fees pet owners are facing are not the result of inflated pay. Our members have shown us that other veterinary workers have seen their wages stagnate even further during the same period, compared to vets specifically.

18. The BVU welcomes the remedy to improve transparency for pet owners when they are selecting or visiting a first opinion veterinary practice, yet concerned that the wording used could suggest this remedy is not being applied to all veterinary businesses. Introducing this remedy for only first opinion practices may mean that veterinary corporations continue to mislead the public with regards to their vertical integration endeavours – such as referral centres, laboratories, crematoria, and online pharmacies (as mentioned above).
19. The CMA notes that they have “*seen no evidence that LVGs which own related businesses ... have sought to restrict access to such services by rival FOPs*”, however there is no mention of consideration here that LVGs may encourage inappropriate use of their own vertically integrated companies, such as referring to their own hospitals when less costly rivals are available, and how to tackle that.
20. The BVU supports the introduction of a levy on veterinary businesses to be used to monitor their fulfilment of the CMA order by the RCVS. It would be completely unacceptable for the membership fees of individual vets and veterinary nurses to cover the costs associated with business regulation. Although the exact detail has not been released, we agree that it is sensible such a levy would be proportionate to the size of the company.
21. The BVU has also consistently called for reform of the Cascade system, by which veterinary medicines are prescribed. The current system is out-dated: it allows for no differentiation in process for veterinary prescribing to food producing animals vs companion animals; it does not allow veterinary prescribers to consider cost as a factor in choosing the most appropriate medicine for a pet; it does not allow the prescribing of generic medicines where there is a licenced branded version – even if the formulations of both medicines are identical.
22. The rules governing veterinary medicines and prescriptions are not only complex but not fit for purpose – individual vets or veterinary nurses can find themselves having to make decisions which cannot fulfil both their RCVS obligations, and the laws governing veterinary medicines, and this is an unacceptable situation.
23. The BVU would be more than willing to provide further engagement, information, evidence and reflections on any issues relating to this important investigation.



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The British Veterinary Union BVU is a national professional branch of Unite the Union, the largest trade union in the UK and Ireland, and sits within Unite's health sector.

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