



BLUE CROSS RESPONSE TO THE CMA VETERINARY SECTOR REVIEW

Blue Cross welcomes the report from the CMA on veterinary care and agrees with the conclusions that veterinary pricing needs to be transparent.

Blue Cross is a charitable organisation seeing pets belonging to people on means-tested benefits. Within the population of those seeking our help, 60-70% of our clients are eligible for free-of-charge treatment including medication, investigation, and surgery following the payment of a £10 consultation fee. The remainder are eligible for the same service at a subsidised cost. Additionally Blue Cross rehomes dogs, cats, small pets and horses through its rehoming centres and advice units.

In our setting, cost is a significant consideration both in terms of the use of our own funds and the acknowledgement of the limited funds of those pet owners eligible for the subsidised service who contribute to the costs of their pet's care. Additionally, central to our decision-making is the welfare of the pet and their owner.

Providing a range of options for an owner when their animal is unwell is a recommendation from this investigation, and in particular tailoring this to the owner's circumstances. This has been discussed across the profession over the last few years within a welfare-centric approach, termed pragmatic, or contextualised care. This is an area that charities have shared experience, with the practical, pragmatic and context driven approaches being routinely taken for animals under their care.

When combined with advancements in veterinary medicine, increased expectations of clients, fear of complaint and rapidly increasing demand for our services, our clinicians face significant challenges in navigating the delivery of veterinary care in a charitable setting. To support our clinicians and ensure a consistent approach, Blue Cross has developed a defined scope of service and range of supporting clinical guidelines that promote evidence-based, welfare-focussed, and cost-effective treatment within our hospital settings.

Taking a pragmatic or welfare-focussed approach adapting to both the owner and pet's circumstances, can in some instances result in a choice to euthanase a pet. In such a situation, the decision is taken as the most appropriate choice, and is never deemed a failure of care for either the owner or the vet.

Specific Consultation responses:

5.3 We are particularly interested in submissions which engage with our provisional analysis of the market, as set out in this document, and our proposal to make an Market Investigation Reference (MIR). Respondents may wish to consider the following questions:

- Do you consider that our analysis is correct with respect to the suspected features of concern in the supply of veterinary services and related services for household pets in the UK? You may wish to answer this in relation to specific points such as:
 - Whether consumers are given enough information to enable them to choose the best veterinary practice or the right treatment for their needs;
 - Our rehoming service has accepted pets relinquished because the owner has been unable to access veterinary care that was affordable for them.

- Our hospitals see clients who are eligible for our services but who have been using a private practice. Many of these clients will come to us as they have been unable to afford the treatment offered.
 - To extend our reach beyond the location of our hospitals, Blue Cross has set up a scheme providing funding to help with treatment costs for individual pets whose owners are struggling and are not within reach of a charity service. The Blue Cross Veterinary Care Fund ([Veterinary Care Fund – Practice Information | Blue Cross](#)) has seen rapidly increasing demand since it was launched last year.
 - Where this fund has been accessed, the decisions made for the onward care of that pet have generally been pragmatic.
 - Whether concentrated local markets may be leading to weak competition in some areas;
 - We have seen an increase in demand for our services, including referrals from private practice, as clients have been unable to afford the options offered.
 - Whether large integrated groups may have incentives to act in ways which reduce choice and weaken competition;
 - We have seen an increase in demand for our services, including referrals from private practice, as clients have been unable to afford the options offered.
 - Whether pet owners might be overpaying for medicines or prescriptions.
 - There does appear to be inequality in the cost of medications across the sector. The market is largely driven by volume of purchase giving an advantage to larger organisations and online pharmacies which can purchase in bulk volumes. As a charity running a non-profit veterinary service, we are sometimes unable to supply medication as cheaply as can be purchased from online pet pharmacies. Blue Cross offers the option of private prescriptions to their clients to allow them to purchase their medication in the most economical way.
 - Whether the regulatory framework remains fit for purpose.
 - The regulatory framework for the profession was written without the challenges faced across the profession today and would benefit from a review.
 - The climate of fear held by veterinary professionals (vet surgeons and vet nurses) around the threat of complaints and litigation has a part to play in the promotion of defensive medicine which makes treatment options generally more expensive for the owner.
 - There has been some disappointment across the profession following the review of remote prescribing and under care guidance, where this guidance has increased the requirement for face-to-face checks for prescription-only parasiticides. Many clients experienced frustration, which in some cases was directed at their veterinary practice.
- Do you consider that our analysis is correct with respect to **the reference test being met** in relation to the supply of veterinary services and related services for household pets in the UK?
 - We agree with the further review
- Do you agree with our proposal to exercise our discretion to **make a reference** in relation to the supply of veterinary services for household pets in the UK?
 - We agree with the further review
- Do you consider that the **proposed scope of the reference**, as set out in the draft Terms of Reference published alongside this document, **would be sufficient to enable any adverse effect** on competition (or any resulting or likely detrimental effects on customers) caused by the features referred to above **to be effectively and comprehensively remedied**?
 - We would like to see online pharmacies included in the list of veterinary services
- Do you have any views on our current thinking on the **types of remedies** that an MIR could consider? Are there other measures we should consider?
 - An understanding of the different wholesale costs to veterinary facilities would be of benefit as this influences the price that vets may supply their clients vs that of internet retailers and has had an impact on the reputation of the veterinary profession.
 - An appreciation of the need for some parasiticide choice within the GSL categories for owners where the cost of a veterinary examination makes access to the POM V categories of parasiticide.
 - An acknowledgement of the rising costs in the sector, including the rise in salary costs which has been driven by a shortage of veterinary professionals in the UK.

- Do you have any views on areas where we should **undertake further analysis or gather further evidence** as part of an MIR in relation to the supply of veterinary services for household pets in the UK? We would particularly welcome any specific evidence from respondents in support of their views
 - Refer to the wholesale cost of veterinary medications in a previous answer.

5.10 We recognise that this is a sector under pressure. We have heard concerns from those working in the sector about the pressures they face, including acute staff shortages, and the impact this has on individual professionals. We also recognise the ongoing concerns of many pet owners. If we proceed with a market investigation, we will be mindful of the burden for individual professionals and we will consider whether there is more that can be done in parallel to improve outcomes for consumers in the short term, even before the conclusion of any investigation (where doing so would be consistent with that investigation). For example:

(a) We intend to publish some advice for consumers to help them acquire the information they need to purchase the vet services that are right for them.

Consider signposting to the charity websites for their support/advice on pragmatic choices for veterinary care for patients with financial restrictions.

It is valuable to recognise the moral hazards that are present for all of those who work in the veterinary profession particularly around how to approach and support treatment context. Just because we can does not mean that we should. By sharing and understanding the contextualised care approach across both the pet owning population and the veterinary profession, it will be possible for a united approach where pet welfare can be championed at the centre of any care decision.

(b) As part of any market investigation, we would expect to explore whether we would recommend any changes to the current regulatory environment. If we were able to reach conclusions on this before the end of the investigation, then we could publish these recommendations once we had developed them.

We would be interested to see these when they have been developed.

We hope that there would be the opportunity for significant professional veterinary input in any proposed changes.

The response from the press and media has placed additional pressures on the profession and individual vets. This comes at a time when veterinary teams are facing increased pressures due to a sector-wide recruitment crisis, a rise in pet ownership, the fall-out of the changes introduced with the RCVS under-care review and the impact of the XL Bully ban. There is a responsibility to transmit the findings of the report in way that highlights the concerns but does not place undue pressure and blame on those working on the frontline in veterinary practice.

