Note: Connected Vet's CMA Compliance Pack has been developed using the CMA's final remedies, published in March 2026, and will continue to evolve as the Orders are finalised and implementation guidance develops. Purchasers will receive updates to reflect material changes to the regulatory requirements, ensuring their documentation remains aligned with the latest CMA expectations.

# CMA Compliance Action Plan

The Competition and Markets Authority (CMA) published its final report in March 2026 and has ruled on its new compliance regulations for the veterinary profession. This action plan is based on the 18 Remedies that the CMA's reforms mandate that every independent vet practice must undertake. Some actions must be taken immediately whilst others do not need to be completed until late 2027. The reforms are designed to help pet owners better navigate the services we as a profession offer. This document outlines a process that is designed to help independent vets comply with the process quickly and with the minimum engagement required by your business.

## 1. Themes and remedies following the CMA's ruling

Before taking action, it's important to be clear on what the CMA has mandated.

### A. The key issues the CMA is seeking to address have been grouped into six categories

1. **Providing general information on ownership, prices and services:** information to support pet owners when choosing a FOP (3, 3a,

2. **Providing information and policies on treatments:** information to support pet owners when considering treatments in the practice

3. **Prescribing veterinary medicines:** information and processes to increase competition in the supply of medicines

4. **Managing out-of-hours contracts:** restrictions on contract terms for third party out-of-hours suppliers, to make it easier for FOPs to switch

5. **Offering cremation services:** information to support choice of service after the death of the pet and provision of a basic communal cremation

6. **Managing complaints:** supporting a good complaints process

## B. Those six categories break down into 18 Remedies. Vet practices will need to implement or understand the remedies within prescribed timescales.

The following table summarises the 18 remedies that all practices must apply. It has been presented in the order that the Remedies must be implemented.

| Remedy # | Remedy purpose | Implementation |
|---|---|---|
| **11.** Out of hours (OOH) contracts | Out-of-hours providers must not have a notice period for practices that is greater than 12 months | Now – Dec 2026 |
| **2a.** Basic service information | Practice/website must display a prescribed list of core information: services, opening hours, ownership etc. | Dec 2026–Mar 2027 |
| **2b.** Price lists | Practice must publish clear, accessible pricing for common services, online and in-practice | Dec 2026–Mar 2027 |
| **2C.** Parasiticides price list | Practice must publish separate, transparent pricing for flea/worm treatments online and in-practice | Dec 2026–Mar 2027 |
| **2d.** Pet care plan | Practice must be transparent on inclusions, exclusions, and value vs pay-as-you-go | Dec 2026–Mar 2027 |
| **12.** Cremations | Clear explanation of cremation options, costs and third-party providers | Dec 2026–Mar 2027 |
| **1.** Ownership | Disclose ownership structure and any corporate affiliations | Mar 2027 |
| **13.** In-house complaint process | Formal complaint process clearly visible and easy to access | Mar 2027 |
| **14.** Mediation | Offer or signpost independent mediation services for disputes | Mar 2027 |
| **10.** Prescription price cap | Adhere to capped prescription fees (if applicable) | Sept 2027 |
| **4a.** Written estimates | Provide written estimates before treatment begins | Sep 2027 |
| **4b.** Itemised bills | Provide fully itemised invoices breaking down all costs | Sep 2027 |

| | | |
|---|---|---|
| **6.** Prescription awareness | Proactively inform clients of right to prescriptions and Provide prescriptions on request without friction | Sep 2027 |
| **8.** Own brand medicines | Transparency on own-brand vs alternatives and pricing | Sep 2027 |
| **9.** Ongoing medication information | Provide clear ongoing cost info for long-term treatments | Sep 2027 |
| **5.** Clinical freedom | Ensure that veterinary professionals have clinical freedom | Sep 2027 |
| **7.** Reduce barriers to purchasing online | Measures that reduce barriers to pet owners purchasing online | Sept 2027 |
| **3.** Practice comparison and Find a Vet | Supply data to RCVS to enable comparison between practices | Sept 2027 |

## C. Implications for your practice

For your practice, the key take-aways are:

- The changes increase your **transparency obligations** (prices, medicines, ownership).
- Your reliance on medicine mark-ups will come under pressure.
- Competition on service, quality, trust and consumer communication will become more and more important.
- Linked to that, clarifying your practice's 'Independence' will become a significant competitive advantage.
- Clear communication will position your practice ahead of corporate chains and other local, independent practice competition.

## 2. Immediate actions

Here are steps you must proactively take to understand the scope and depth of the compliance action and to ease the admin burden of implementation by spreading that burden over an appropriate period of time. Completing selected actions early may also give you a competitive advantage.

| Step | Action | Why it matters |
|---|---|---|
| A. Team briefing & governance | Convene a meeting of senior management /veterinary partners to review the CMA decision and potential implications. Assign a "CMA compliance lead" internally. | Ensures the practice is aware, engaged and ready. |
| B. Pricing audit | Review current pricing structure: treatments, consultations, referrals, medicines, care plans, cremation/aftercare etc. Document mark-ups, compare internally what you charge vs. publicly available data. | Allows you to see where you may be exposed to criticism or competitive disadvantage. |
| C. Medicine /prescription margin review | Analyse how much margin/mark-up you apply on veterinary medicines and prescriptions. Map out cost vs selling price and check if you have consistent pricing practices. | The cap/pressure on prescription fees will affect us. You will need visibility of margin. |
| D. Consumer-facing transparency review | Check what information pet owners currently receive: price lists (if any), itemised bills, treatment options, referral options, branded vs independent ownership. Update client-facing communications (leaflets, websites) for clarity. | The CMA has emphasised the need for upfront information and choice. |
| E. Website & marketing review | Ensure your website clearly indicates: you are an independent practice, your ownership structure, your basic standard fees and or a typical "menu" of services (where practical). Consider publishing a sample price list of common services. | Helps differentiate our practice and builds trust; aligns with CMA's transparency expectations. |
| F. Referral treatment & records process check | Review yyour referral process: how the client is informed of options, costs, who benefits from referral, whether records are portable and the client is free to choose alternative referral provider. Ensure you have a standard disclosure. | CMA concern about "choice of treatments and referrals". |
| G. Care plan / value bundle review | If you offer pet health care plans or subscription-type services, review what is included, whether the pricing is clear, whether clients understand alternatives, and whether clients are locked in. | Some remedies may target practices that use opaque care plans. |
| H. Ownership and branding transparency | Even as an independent practice ensure that if you are part of a network or have any affiliates, there is clear disclosure of your ownership structure. Internally review whether branding or affiliate relationships might create confusion. | Helps avoid being caught out if the CMA scrutinises practices tied to larger groups. |

| | | |
|---|---|---|
| I. Risk assessment / business model review | Run a simple scenario planning exercise: what if medicine margin is capped, or a mandated price list is imposed, or a competitor publishes low prices via a comparison site? How will that impact your profitability and competitive position? | Helps you adapt early to maintain viability. |
| J. Client communication preparation | Draft a communication to clients that explains your commitment to transparency, independent status, pricing clarity, value, and your role as trusted advisor. | Using client trust as a competitive advantage will be key. |

# 3. Medium term actions

Before March 2027 but in any case as soon as possible you should consider the following work.

## 3.1 Operational & Pricing Adjustments

- **Develop and publish a standard price list**: Identify a set of commonly-used services (consultation, vaccines, standard procedures, basic imaging, aftercare/cremation) and prepare to publish typical fees (or ranges) on your website and in-clinic.
- **Medicine/prescription pricing policy**: Set a clear policy for medicine mark-ups (e.g., fixed margin, capped % mark-up) and prepare operational procedures for dispensing and subsequent accounting. Monitor margins monthly.
- **Billing practices**: Ensure that invoices/bills are clearly itemised (treatment, medicine, labour, aftercare) and that clients are told upfront when treatment cost is projected to exceed a significant threshold (e.g., £500+). The CMA has signalled this expectation.
- **Referral and treatment options disclosure**: Introduce or enhance a standard client sheet or digital form that explains treatment options (including lower cost alternatives, expected outcomes), other referral providers, costs and who bears what risk/benefit.
- **Record-keeping and portability**: Ensure your practice has client consent procedures in place along with a system to transfer pet medical records easily (on request) to another provider. Review your PMS and staff training to check both are appropriately resourced to achieve straightforward portability.
- **Review of care plans/subscriptions**: If you offer monthly/annual health plans, review the terms: are clients always aware of what they can cancel, what the alternatives are, and how the cost compares to pay-as-you-go? Consider publishing a comparison.
- **Competitive benchmarking**: Monitor the pricing transparency and service offering of nearby practices (independent and chains). The likely emergence of a central comparison website means clients will have access and you will be more exposed to competitive scrutiny.
- **Marketing/positioning**: Emphasise your independent status, local responsiveness, transparent pricing, client-service focus, trust and value. Make sure your marketing messages align with the evolving regulatory environment.

- **Staff training**: Train reception/staff vets on how to explain treatment options, pricing, referrals, alternative services, and the value the practice offers. Emphasise customer-communication skills and transparency.
- **Financial modelling**: Re-forecast your revenues and margins under various regulatory scenarios (e.g., medicine margin cap, published price list, increased admin/transparency overhead) and adjust your cost base or service model accordingly (e.g., review procurement, efficiencies, alternative revenue streams).
- **Procurement review**: Investigate cost of goods (medicines, consumables) and negotiate with suppliers; explore group purchasing organisations or independent networks to reduce your cost base, storing you better to absorb any margin pressure.

## 3.2 Compliance & Legal / Governance Preparation

- **Engage advisers**: Speak with your legal/compliance/marketing advisers about potential remedy obligations and consider whether you might need/want to adjust your ownership disclosures, billing practices, etc.
- **Data/analytics readiness**: Begin collecting and storing internally relevant metrics (average treatment cost, breakdown of revenue by service/medicine, mark-up % on medicines, referral revenues) so that you can demonstrate compliance or benchmarking if required.
- **Client feedback & complaints mechanism**: Strengthen your client feedback process, make complaint handling visible, and monitor client satisfaction; regulatory scrutiny may increase.
- **Risk register update**: Add a risk entry for “CMA remedy implementation risk” (and associated cost/reputation risk) and monitor.
- **Internal audit/policy implementation**: Prepare or update written policies on pricing transparency, referral disclosure, medicine margin, billing best practice, staff communication, client choice.
- **Insurance review**: Check your professional indemnity and business insurance for any coverage, and consider whether the regulatory shift might affect your risk profile.
- **Change-management plan**: Develop a plan (with timeline) for how you will implement changes once the final CMA decision is confirmed. Identify responsible individuals, budget, timelines, communications, staff training.
- **Communication plan**: Prepare to communicate to clients and staff about upcoming changes. Proactive communication will reduce disruption, build trust and highlight your transparency.

## 3.3 Strategic Positioning

- **Differentiation**: Consider how you will emphasise your advantages: independence, transparency, local community orientation, flexibility, personalised care. These will become more important in a more transparent market.

- **Client value proposition review**: Revisit your service mix; consider whether you should develop new value-added services (e.g., wellness programmes, preventative care, pet owner education) which help set you apart rather than competing purely on price.
- **Partnerships & alliances**: Explore collaboration/network arrangements with other independent practices (for purchasing, referral networks, joint marketing) to strengthen your competitive position without losing independence.
- **Technology investment**: Look at investing in software/tools that enhance client transparency (online portals showing pricing, invoices, treatment plans), record portability, digital communication.
- **Monitor regulatory/industry developments**: Keep up-to-date with the CMA's ongoing updates when published and any secondary legislation or guidance. The CMA's provisional decision was published 15.10.25
- **Scenario planning for consolidation pressures**: Even as an independent, understand the competitive landscape (large chains, corporate groups). Think about how you maintain or grow your market share under increased transparency (clients may switch more easily).
- **Revisit your pricing strategy**: You may need to move towards more "value-based" pricing (not just medicine margin driven) and ensure your treatment/consultation fees reflect your service quality and business cost base. Communication of value rather than price competitiveness may play a major part in this action.

# 4. Implementation timeline

Here's an example phased timeline to integrate the above actions into practice operations:

### Month 0-2

- Leadership meeting, assign CMA lead
- Price and medicine-margin audit
- Competitor audit
- Client-facing transparency review (website, leaflets)
- Staff briefing/training planning
- Risk register update and scenario modelling

### Month 3-6

- Draft standard price list for publication (common services)
- Publish price list on website and in clinic
- Revise billing/invoicing format to ensure itemisation
- Draft treatment/referral disclosure form
- Review and update care-plan/subscription terms
- Procurement cost review
- Staff training on communication of pricing and options

**Month 7-12**

- Implement medicine margin policy and monitor monthly
- Implement referral disclosure process
- Collect and analyse key metrics (treatment cost breakdown, margins, client feedback)
- Develop client communication stream (newsletter/email/social) about transparency initiative
- Adjust marketing/positioning to emphasise independence, transparency & value
- CMS review for future record portability and transparency
- Continue scenario planning and adjust cost/price model accordingly
- Plan to update policy/manuals accordingly

**Immediately following the final decision**

- Review final CMA remedies vs the list above and re-assess timings/immediate compliance requirements
- Communicate with staff and clients about the changes you have and will make
- Audit for compliance (e.g., disclosure statements, price list, medicine mark-up)
- Monitor competitive impact and adjust strategy for growth/market share

# 5. Key risks & mitigation

Here are some possible key risks practices should monitor, with suggested mitigation actions:

| Risk | Mitigation |
|---|---|
| Margin squeeze on medicines/prescriptions (if cap imposed) | Review procurement costs, reduce cost base, shift focus to service value rather than medicine margin. |
| Increased admin/burden (publishing price lists, itemised billing, transparency) small practices may struggle | Develop efficient processes (use software, templates), allocate lead responsibility, keep changes proportionate and phased. |
| Clients comparing purely on price, selecting cheaper chains or online alternatives | Emphasise service quality, trust, independent status, personalised care; show clear value rather than just price. |
| Mis-communication with clients/staff about changes | Provide clear training, FAQs, client communications explaining why changes are being made (for transparency, better value). |

| Risk | Mitigation |
|---|---|
| Being caught out by ownership/branding issues | Ensure your ownership structure and branding disclosures are clear. |
| Inability to sustain profitability under new regime | Conduct scenario modelling now; adjust cost base, service mix, fee levels as necessary to maintain viability. |
| Unintended consequences of remedial changes (reduced service quality, less investment) | Ensure, as an independent, that you maintain communication of your quality & value if price is not your local USP. |

# 6. Success metrics and monitoring

To ensure you can track progress, always suggest that practices adopt metrics and review the cadence of them being updated. Here is a suggested list:

- **Monthly**:
  - Medicine prescription revenue and gross margin %
  - Number of treatments/procedures by category and average fee per treatment
  - Average invoice value, breakdown (consultation, treatment, medicine, aftercare)
  - Client enquiries about pricing or treatment options (volume)
  - Client feedback/complaints relating to pricing, transparency, referrals
- **Quarterly**:
  - Ratio of published-price services (those listed) vs ad-hoc quotes
  - Percentage of clients who receive itemised bills and referral disclosure forms
  - Number of clients transferring in/out (portability)
  - Website analytics: number of visits to pricing page, time spent, bounce rate
  - Staff training sessions held, staff feedback on how easily they communicate pricing/options
- **Annually**:
  - Comparative profitability under new cost/fee models (scenario modelling)
  - Client retention/loyalty metrics and new client acquisition trends
  - Competitive benchmarking vs local practices (pricing, service mix, transparency)
  - Review of client communications and marketing impact (brand perception as independent/transparent)

Perhaps set up a dashboard (a simple Excel sheet) to record these metrics for review at the practice's leadership monthly meeting.  Action plans can then be adjusted based on what the data tells us.

# 7. Communication strategy

Effectively communicating your practice's positioning and proactive improvements to both staff and clients will help them differentiate you to existing and potential clients. This is proven to build trust. Practices should consider the following communication elements:

- Define and document your positioning in the light of your local competition & the CMA requirements

- Draft comms to clients (emails, news articles, social posts, letters and in practice leaflets/posters ) titled something like "Your practice's commitment to transparency and choice" that explains:
    - Why and how the CMA requirements will change the veterinary services market.
    - What your practice has always done and is doing to further comply
    - Reassure clients of your continuing independence, your focus on quality care and what you are doing to maintain/expand/double down on your service offering.

- Website updates
    - A new "Transparency" or "Pricing & Value" page that includes:
        - Typical price list of common services (with a note that each case is unique)
        - Explanation of your independent ownership (if applicable) and what that means for clients (local decision-making, no corporate pressure)
        - FAQ about treatment options, referrals, medicine cost, how to choose a vet, what to expect.
    - Review and update website core content as needed
    - Review and update website metadata as needed
    - Add or update FAQs for AI on the whole CMA subject and its implications
    - Series of blog articles
- Staff updates and training to communicate your value proposition, transparency initiative and the benefits to clients of your practice's approach.
    - Internal communications to staff: explain regulatory changes coming, your action plan, role of each team member, and emphasise culture of transparency, trust and high-quality service.

- Staff briefing/training on how to talk to clients about pricing, options and value — empower the team to confidently discuss treatment choices and explain cost drivers.  AKA – teach the team how to articulate your strategic response to the CMA requirements.  Role play all FAQs with staff.

## 8. Review of business model & strategic considerations

Longer term, the regulatory shift invites a strategic review of the business model of independent practices:

- **Service mix focus**: Consider the wisdom of shifting away from reliance on high-margin commodity medicines towards offering value-added services (wellness checks, preventative care, diagnostics, specialist services) where you can compete on expertise rather than just cost of commodities.
- **Differentiation by client experience**: As transparency becomes standard, service quality, ease of communication, client engagement, aftercare, and convenience will matter more in client choice. Invest in that = more reviews please!
- **Client loyalty and retention strategy**: With easier comparison for clients, you'll want to build strong relationships, client satisfaction programmes, loyalty incentives, and perhaps client feedback loops to maintain competitive edge.
- **Expansion or diversification**: With the pressure on medicine margins and commodity services, explore whether your practice could expand into underserved specialist niches.
- **Technology & digital services**: Consider telemedicine, online portal for pricing/treatment plans, patient record access, client education resources — these help create a modern, client-centric offering.
- **Network or alliance opportunities**: Joining a buying group for purchasing power, referral networks or for marketing tips that can strengthen your competitive position without forfeiting independence.
- **Cost base and efficiency**: Given medicine margin compression risk, ensure your cost base (staffing, consumables, equipment, premises) is lean but sustainable. Regularly review for efficiencies and smarter procurement.

## 9. Contingency for final orders implementation

Once the CMA publishes its **orders**, practices should be ready to act promptly.

- Check whether there are **statutory obligations** (for example, price caps, mandated disclosures) and whether your policies need formal amendment.
- Update policies, staff training, client communications and systems to comply.
- Monitor and document compliance (for example, medicine margins, published price list, referrals, records portability) — you may need to show evidence if the CMA or regulator asks.
- Consider a one-year review (or six-month) to assess how the new regime has affected your business — client mix, pricing pressures, margins, referrals, competitive landscape.
- Continue to liaise with professional bodies and industry associations to stay abreast of further changes or guidance.

## 10. Summary: Why this matters and how independent practices gain

By taking these steps early, an independent practice can:

- Be **ahead of the curve**, reduce reactive scrambling once obligations are imposed.
- Leverage your independent status and transparency to build **trust** and differentiate yourself.
- Minimise the risk of being undercut by competitors or regulator-imposed margin pressures.
- Protect your profit margins and business model by preparing for possible medicine margin caps, price transparency pressures, and increased client choice.
- Use the regulatory change as an opportunity to reposition your practice for growth (through service quality, client experience, strategic differentiation) rather than simply coping with change

## 11. Why Connected Vet

Connected Vet has a strong pedigree in delivering veterinary practice compliance products and services.

- Since 2018 CV has led the way in GDPR compliance products and services for independent veterinary practices in the UK.  We plan to do the same with the marketing and communication elements of the CMAs requirements.

Your legacy (GDPR) compliance products and services are..

- More comprehensive – we go beyond marketing considerations

- More accurate – our products are peer reviewed before they go to market
- More trusted – we delivered more GDPR consultancy for more independent vets than any other organisation
- More effective – A combination of the features and benefits already stated make our products more economically and procedurally effective as they are optimised for SME independent veterinary practices in the UK.

When the CMA publishes its final requirements, our plan is to support independent practices with a similar approach.