Comhla/VetFirst

As requested by the Commission please accept the following submission on behalf of Remarkable Vets regarding aspects of the Comhla/Vet First takeover.

Part 7. Competition analysis

Points 90 and 93 refer to the presence of PA Competitors and Competitor Market Share in Cromwell and Wanaka
There is factual error in the information submitted relating to the competition status in the above regions.
In **Schedule 1, pages 41 and 60** - The document states that Remarkable Vets has 5 FTE vets across 2 clinics actively performing PA work in these districts and therefore constituting an active competitive entity.
The fact is that we perform ZERO PA work in these districts. We consider them outside of our serviceable area for sheep, beef and deer and we do not engage in any Dairy cattle work.
[redacted]

Opinion Variance Regarding Barrier to Entry for a CA Clinic.

It is our opinion that there is a high barrier for the establishment of a fully functional CA clinic.

This particularly applies to areas of Central Otago and Lakes District because of:
(1) - High land values for both purchase or rental options

(2) - Significant Resource Consent obstacles for Discretionary Activities (such as Veterinary Activities) in any zone other than Industrial.

(3) - Veterinary Code requirements for provision of 24 hr emergency care. Unlike the more dense urban areas of NZ where dedicated emergency clinics exist, the rural areas must (and should) ensure their clients have access to emergency care. For start up clinics of 1, 2 or even 3 veterinarians this puts a significant demand on availability. Sharing of after hours with any larger clinics in geographic proximity requires collegial cooperation which may or may not be forthcoming.

(4) - Societal expectations of the level of service provision by a CA clinic. The evolution of veterinary medicine over the last 30 years has been matched by the

expectations of the public. This ensures that a new clinic requires significant capital investment in order to be functional and competitive. A reasonable estimate for equipment and building fit out for a small to moderate sized CA clinic would be in the order of $500k to $1M.

Please do not hesitate to make contact if you have further questions

Signed

Dr Geoff Woodhouse BVSc (Dist) Cert VA
Director, Remarkable Vets
[redacted]