



## Funeral Furnishing Manufacturing Association (FFMA)

C/o Tributes, 40 The Vinery, Arundel Road, Poling, West Sussex, BN18 9PY

Funeral Markets Study  
Competition and Markets Authority  
7<sup>th</sup> Floor  
Victoria House  
37 Southampton Row  
London WC1B 4AD

Dated June 27<sup>th</sup> 2018

Dear Sir or Madam,

I write on behalf of the Funeral Furnishing Manufacturers Association (FFMA). We are a Trade Organisation which represents manufacturers and suppliers to the Funeral Trade and we also administer a Coffin and Casket Testing regime to accredit coffins which are of a high standard, fit for purpose and also suitable for cremation.

We represent the vast majority (98%) of all Coffin and Casket manufacturers and re-sellers, from the small independent business to the larger corporate ones. We are therefore interested in your CMA enquiry and wish to offer our assistance. Following your request, please find the following submission, since the points raised are of particular interest to our members:-

### Coffin and Casket Safety

The FFMA has its own Coffin Testing Accreditation initiative, developed in consultation with crematoria staff and funeral directors. It uses a series of agreed tests to validate coffin or casket quality. These are all contracted to an independent UKAS Testing House and the test results are collated to verify a pass or fail status. An ink trade-mark is stamped on the coffin base to identify an accredited coffin.

Our member believe this should be recognised by all funeral directors and crematoria to ensure that only "good" coffins are used in the trade and thus negating the use of cheap imported and "copycat" products and possible safety or environmental issues.

To date, there have been relatively few incidents of coffin failure. Those which have been reported to us have caused a great deal of distress to both the public and staff involved. The reported incidents involved non-accredited products. It is the belief of FFMA members that our accreditation should be recognised at all levels and integrated into any future standard.

### Pre Payment Funeral "Plans."

We are concerned about misleading Funeral "Plans" sold as packages, often by "agents" who are not experienced funeral directors.



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The many we have examined do not specify what is exactly included in the plan and do not give a breakdown of the costs. For example - coffins; they are often not specified yet many types and styles exist. This is a possible problem, as all coffins differ in price and are often specifically chosen by families for many varying reasons. We are concerned that this lack of transparency and detail may lead to consumer confusion. Coffin detail should be correctly specified and noted to avoid this possible issue.

Funeral Directors are required to give a detailed estimate for "At Need" funerals, a practice confirmed after the last Office of Fair Trading review and is advocated by the two main Trade Associations, namely the National Association of Funeral Directors and the Society of Allied & Independent Funeral Directors. This practice should be extended to include all funeral plans, both "at need" and "pre-paid".

Funeral Plans are bought for good reason as it facilitates the funeral arrangement and can make it easier to budget and spread the cost. As mentioned previously, the concern is the lack of itemisation and cost detail. If plans are sold by agents, a further issue arises. The "face value" of the plan may be diminished as money is sliced by commissions and management charges before they are finally re-sold to participating funeral directors. FFMA members advocate that such commissions should be declared on the plan at the point of sale, so the true value of the Funeral Plan can be correctly ascertained by the consumer.

The FFMA advocates choice and its members are concerned that many of the Independent Funeral Directors who they supply are exclusively contracted to a single plan provider, often to enjoy enhanced benefits on commissions and funeral allocations from the plan provider. The FFMA believes such contractual arrangements may restrict consumer choice as they effectively tie the funeral director to one plan provider.

Please let us know if we can be of further help to the CMA.

Yours sincerely,

President,  
on behalf of the FFMA.