

Funerals Market Study Team
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I write as Chair of the Dundee Funeral Support Service, operating as **funeral link**, in response to the CMA Funeral Markets Study interim report and consultation.

For several years there has been a concern, both at a national and local level, around the increasing costs of funerals exacerbating funeral poverty. This concern is demonstrated through the Scottish Government commissioning the 2015 “The Cost of Saying Goodbye” report and at a local level in Dundee through the formation of the Dundee Funeral Poverty Action Group who commissioned research into funeral poverty in the city. As a consequence of this Dundee Funeral Support Service was established as a Scottish Charitable Incorporated Organisation at the end of 2018. The research suggested that consumers would welcome independent advice on arranging funerals. However, barriers to engaging consumers with this information at “point of need” (when they are typically upset and not inclined to shop around) would need to be considered.

Our organisation was specifically established to address this identified need and seeks to alleviate funeral poverty by encouraging greater dialogue around the issue of funeral planning. However, our key aim is the provision of support to individuals and families who at the time of bereavement find themselves financially unprepared. **Funeral link** will provide information, advice and support on a range of options for funerals and associated services with a view to people selecting a package most appropriate to their wishes and circumstances. We will act as a link between the bereaved, and the range of services associated with a funeral from those provided by funeral directors, coffin suppliers, car hire companies, through to florists and caterers.

It is clear from the CMA interim report that there is a lack of clarity and competition within the funeral industry to allow people to make informed choices on funeral services. We therefore agree that there is sufficient evidence in the CMA report which identifies significant concerns to merit a market investigation reference.



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In particular **funeral link** recognises that there is a lack of competition within the funeral industry which compounds the lack of choice available to people at a particularly vulnerable time in their lives. Clearer, unambiguous information which allows the comparison of prices and packages against a quality regulated service would ensure fairer consumer choice. This mirrors the issues identified in para 8.31 of the interim report. Therefore, we agree with the CMA's analysis with respect to the suspected features of concern in the supply of funeral services at the point of need.

In Dundee there is only one private crematorium in operation which restricts any element of choice and the issues identified at para 8.33 (b, c & d) of the report resonate firmly in relation to the restriction of choice of crematoria. The high entry costs and planning regime suggested in the CMA interim report have probably contributed to the lack of competition in Dundee.

Grief, distress and financial concerns combined with the lack of regulation and competition within the funeral industry dictate against people making considered choices. Any measures that will make the industry more transparent are to be welcomed.

Hopefully a market investigation will result in a more open, regulated and competitive funeral industry which in turn will enable people to make more informed and affordable choices on funeral services.

Yours faithfully

Mary Kinninmonth

Chair, Dundee Funeral Support Service