



ASSOCIATION OF PRIVATE CREMATORIA & CEMETERIES

1. The Inclusion of all Burial and Cremation Practices and Pricing Policies which have an impact on the Burial and Cremation Sector

We are well aware that unease has been expressed through various channels over the exclusion of cemeteries and burial costs and the purportedly rising trend of 'Direct Cremation'. Although appreciating the challenges their inclusion might pose, we find it very difficult to see how any further report which does not analyse their costs and pricing policies can or will be regarded as being a comprehensive and a wholly objective investigation of the sector. It is also thought that little or no attention has been or is intended to be given to other emerging trends such as 'Green Burial'.

In addition, if the above exclusions remain, is there not a very real risk that your report will be perceived as incomplete and potentially just aimed at primarily criticising private owners and operators of crematoria? This would surely reduce both its effectiveness and the motivation for introducing revised practices where desirable and necessary - hopefully on a self-regulatory basis.

2. 'Regional' Detailed Comparison of Service Provision in terms of Costs and Pricing Policies

It is thought that there is an opportunity for greater comparison of the precise services provided and the fees charged but it is recommended this be assessed by major – possibly unitary authority area - in each region of the country in order to ensure that underlying local costs such as business rates are properly reflected.

While there are certainly local authority owned and run crematoria which provide a very high standard of service, there are also those who deliver a much more restricted service such as not having services over the lunchtime period or through a Friday afternoon as well as strictly limiting access to memorial gardens and cemeteries. The prime aim of this work would be to analyse 'local provision' from the same base of variable factors so as fair comparisons as possible can be made.

3. Current and Continuing 'Consumer Research'

Given, in comparison to the historical position, the rate of change of both consumer and government led requirements in relation to funerals, together with the appearance of clearly identifiable emerging trends, it is suggested that a wider ranging research project be established, using a considerably larger sample of 'consumers' and be operated on a continuing basis. Such an exercise would allow the costs and charges of changing requirements to be far more accurately assessed both for the present and going forward.

4. Multi-Discipline Working

Currently there are several central government departments and associated agencies working on or about to work on proposed reforms which will impact on the sector as a whole. Examples are:

- Department of Health and Social Care / Ministry of Justice - Death Certification
- Law Commission: Reform of Burial and Cremation Law
- Department of Housing, Local Government and Communities - Review of Crematoria Provision and Facilities

In addition it is anticipated that the full enactment of Burial and Cremation (Scotland) Act 2016 will result in similar practices being adopted in England and Wales. Therefore it would seem important the CMA be fully acquainted with all these activities and we believe that the Association can be of considerable assistance in this regard.

5. Reference to History

Reference is made in your report to the Office of Trading investigations and their recommendations at the beginning of this century. Some of the current officers of the Association were closely involved with that exercise, albeit in a slightly different capacity, so again relevant assistance is available through the Association.