

**Response to the CMA Report from Kevin Cobbold Funeral Services Ltd.  
Our responses are in bold.**

Do you consider that the CMA's analysis is correct with respect to the suspected features of concern in the supply of:

- services by funeral directors at the point of need (see paragraph 8.31); and
- crematoria services (see paragraph 8.33)? **Yes. Measures need to be taken to protect the public at their most vulnerable time from overcharging and profiteering by some funeral directors and crematorium owners.**

Do you consider that the CMA's analysis is correct with respect to the reference test being met in relation to the supply of:

- services by funeral directors at the point of need (see paragraphs 8.12 to 8.37); and <sup>132</sup>
- crematoria services (see paragraphs 8.12 to 8.37)? **Yes. The analysis is correct in both cases.**

Do you agree with the CMA's proposal to exercise its discretion to make a reference in relation to the supply of services by funeral directors at the point of need and the supply of crematoria services (see paragraphs 8.38 to 8.96)? **Yes. Due to the market hold of [X] and [X], the problem is widespread and endemic.**

**Resistance to change has been rife for years as vast profits have been made by certain providers.**

**The market power of crematoria in many areas results in overly high prices due to no competition. We believe that ownership of crematoria needs to be looked at so that pricing becomes fairer. We support the possibility of certain crematorium owners being divested of their ownership/leases so that prices settle to a level that does not take advantage of the consumer.**

**We agree that vulnerable consumers are suffering harm and that certain funeral directors should be challenged when they claim that higher charges equate with higher quality as it is not the case. In fact, when consumers use the highest charging funeral directors they often are privy to the following:**

- **Call centres taking calls out of office hours.**
- **The deceased being kept at central hubs rather than at the funeral director's premises.**
- **The deceased being unnecessarily moved around the area to fit with the company's storage capacity.**
- **Dealing with a different person every time they contact the funeral home rather than one designated person looking after them.**
- **Being met with a completely new face to conduct the funeral on the day rather than someone they have spoken to or met before.**

**Most lower charging independent funeral directors provide an enhanced level of care to the bereaved, yet they usually charge over £1,000 less for the funeral. A standardised format for online pricing in line with that proposed in point 8.70 would be excellent.**

**A funerals regulator suggested in point 8.72 would transform the market and protect the vulnerable. The membership of the professional body NAFD is**

**mainly the big chains, so they are limited in the ways they act to challenge overcharging.**

Do you consider the proposed scope of the reference, as set out in the draft terms of the reference in Appendix F, would be sufficient to enable any adverse effect on competition (or any resulting or likely detrimental effects on consumers) caused by the features referred to in paragraphs 8.31 and 8.33 to be effectively and comprehensively remedied? **Yes, we do.**

Do you consider that the features which the CMA has identified that may prevent, restrict or distort competition are capable of being effectively and comprehensively remedied by UILs (undertakings in lieu of a MIR)? **No, we consider that a full MIR is needed.**

Do you have any views on our current thinking on the types of remedies that an MIR could consider (see paragraphs 8.66 to 8.86 above)? Are there other measures we should consider? **Ref paragraph 8.81: there are only two crematoria in [X], both run by [X]. They each charge £1,060.00 for a cremation, which is £10 short of the highest charge in the country. One of these crematoria ([X] Crematorium) is leased to [X] by the council. We believe that divesting [X] of the running of [X] Crematorium would create a far healthier market for the bereaved of [X] and the surrounding area, as a monopoly of ownership would no longer exist and more competitive prices would result. Currently the nearest crematorium not owned by [X] is over 20 miles away and this is too far for families to travel to for a funeral when they have two crematoria on their doorstep.**

**We believe that the unhealthy state of the funeral industry (in terms of how overcharging has been happening for years and in terms of how the bereaved are not in a state of mind for questioning prices) should be addressed by:**

- **an urgent, strong drive for transparency of pricing**
- **empowerment of the bereaved through media campaigns; price comparison websites; insistence on clarity of true ownership of funeral homes**
- **challenging the marketing falsehood that top prices equal top quality in the funeral industry**
- **divestiture of crematoria where monopolies (and inevitable overcharging) exist**

9.7 The CMA would particularly welcome any specific evidence from respondents in support of their views.

9.8 In addition to the above, the CMA would also welcome evidence and views on the following matters:

(a) Quality of care of the deceased: we have received anecdotal evidence that there may be varying standards of care being applied by funeral directors and would like to understand how widespread such issues may be. We would therefore like to hear from people who have witnessed standards of care which they considered to be unacceptably low. **We believe that questioning standards of care is a ruse used**

by high charging funeral chains (and some higher charging independents) to persuade people to believe that the more they pay, the better standard of care they will be getting. We know that this is not the case in the Norwich area. If sub-standard standards of care exist, they should be rooted out, of course, and the relevant funeral directors prevented from practising. However, we are suspicious of such claims for the reason stated above. We would claim that the vast majority of independent funeral directors provide the most personal of care with the highest standards both out front and behind the scenes of their funeral homes. We welcome the possible introduction of a government inspector to regulate standards.

(b) Issues specific to religious groups that are not covered in this report: we have focused our work on the transactional aspects of funerals involving funeral directors and crematoria. We believe that the issues we have identified in relation to those specific aspects would essentially be similar across all faiths (to the extent that the way they organise funerals involves transactions with funeral directors or crematoria). We are keen to find out whether we may have overlooked any issue of relevance and will seek to engage actively with the representatives of the major faiths.

9.9 Such comments should be provided no later than 5pm on 4 January 2019 to:

Funerals market study team  
Competition and Markets Authority  
Victoria House  
37 Southampton Row  
London WC1B 4AD  
Email: [funerals@cma.gov.uk](mailto:funerals@cma.gov.uk)

9.10 Our intention is to publish on the CMA's website an aggregated and anonymised summary of submissions from individuals, although if you prefer, you can indicate that you would prefer for your response to be published in full.

9.11 We intend to publish all responses from businesses and other organisations on the CMA's website, except those responses marked as confidential. Respondents may request that their response be kept confidential. If you would like your response to remain confidential, clearly mark it to that effect and include the reasons for confidentiality. **We are happy for our responses to be published.**