



## **ASSOCIATION OF PRIVATE CREMATORIA & CEMETERIES**

### **Competition and Markets Authority (CMA): Response to Overview Paper**

#### **Introduction and Objectives**

This paper has two prime objectives, namely to respond to the relevant sections of the CMA's 'Overview Paper' issued on 30<sup>th</sup> January by direct reference to specific headings and clause numbers as well as integrating the Association's more general views and related current 'work in progress' where appropriate.

#### **Market Structure**

Clause 56: Although accepting this in the general sense it seems to be meant, it is also very important to constantly monitor demographic movements as these do have an impact on both local availability in geographical terms and on available capacity given the continuing trend of longer service times. One, somewhat approximate way of keeping an eye on this, is to look at the Cremation Society of Great Britain's 'Directory of Crematoria' published annually each Autumn, which lists potential developments under the heading 'New Crematoria Schemes Under Consideration'. This can be a useful first step to more detailed research.

Clause 57: While again agreeing in general with this comment, we do believe that the detail and scope of information submitted for planning applications to be both very comprehensive and usually of a very high quality. It is therefore disappointing that reasons for refusal are not always similarly robust or consistent. We are currently researching specific examples and will forward these to the CMA shortly.

#### **Drivers of Customer Choice**

Clause 58: In order, certainly over the longer term to try and monitor any discernible moving trends in this regard, we are encouraging members to produce summary reports, preferably on a quarterly basis, in order to keep a quantified track of such information, which some of them we believe already do, which help quantify the loyalty factor.

#### **Competition on Price**

Clause 59: There is some truth in the claim that benchmarking takes place to ensure operators are not out of line with their local competition. Local politicians can certainly influence the setting of cremation fees but again an approximate way of monitoring this is to keep track of movements in respect of individual crematoria through the Cremation Society's league table set out in the Summer edition of their publication 'Pharos' each year.

In relation to sub-paragraph a), it should be emphasised that this position, as stated in your first report, does not apply universally. In respect of sub-paragraph b), having personally very recently come across an example of a funeral director boycotting a crematorium because they wouldn't negotiate on price, it will be interesting to see if and how the situation is, albeit slowly, changing.

### **Competition on Quality**

Clauses 60 & 61: It is felt that this is too broad a statement. There are specific examples of where the bereaved have changed their allegiance to a more modern and possibly more accessible facility, a prime example being Seven Hills Crematorium at Nacton, Near Ipswich, opened in 2010 and run by East Suffolk Crematorium Limited, which carried out 1,928 cremations in the 2018 calendar year compared with Ipswich crematorium run by the Borough Council with some 960 cremations over the same period. We hope to supply details of similar examples.

### **Potential Remedies and in Conclusion**

In relation to 'Potential Remedies', we do have a very real concern, namely that there is not currently sufficient recognition and /or acceptance of increasing trends which are likely to result in significant reductions in revenue for crematoria. The most prominent of these would seem to be Direct Cremation but the increase in the number of funeral directors opening Service Chapels also needs to be taken into account. Therefore the Association is trying to establish more definitive data on these and similar matters and include them in our responses to the questions asked in the most recent document with replies required by March 19<sup>th</sup>.

Further, we would also like to request a meeting with CMA representatives but understand that it may be preferable for this to take place after the publication of the provisional report.

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