

Competition and Markets Authority  
Victoria House  
Southampton Row  
London  
WC1B 4AD

5th March 2020

Dear Sirs,

**Funeral Market Investigation – response to CMA working paper on remedy options for regulating the price of crematoria services**

Treske Ltd have been designing and manufacturing bespoke furniture solutions for both the domestic and commercial sector for the last 48 years with a nationwide reputation for quality and longevity. The ethos at Treske has been very much that 'value is not just the price you pay, but also the time frame over which you wish the furniture to last'. Treske has used this principle to complete some very prestigious projects in both the ecclesiastical and commercial sector where clients have required furniture and seating to stand up to regular use by members of the public without everything looking as though it were brought straight out of a contract office supply catalogue.

**Treske's experience in the crematorium sector**

Treske Ltd have been providing bespoke furnishing solutions specifically to the crematorium and funeral sector for the last 10 years.

Treske entered into this sector when they successfully tendered for furnishing a 'crematorium in the desert'. Al Foah Crematorium in Al Ain, Abu Dhabi appointed Treske to completely furnish the interior of the new facility which was the very first crematorium to be built in Abu Dhabi.

Having completed this first successful overseas project, Treske were then invited to help Dignity PLC with several of their crematoria refurbishment projects and one of their new build projects at Trent Valley in Derbyshire. Treske have now completed around 45 large and small crematoria projects working with some of the largest independent and publicly owned sites with our clients including Dignity PLC, Westerleigh Group, Horizon Cremations, Pure Cremations, Memoria Ltd, Chesterfield Council, Stockton Council, Cardiff City Council, Solihull Council, Guildford Council and many other key nationwide crematoria and funeral chapel operators.

**The importance of quality to the family experience**

Treske has discovered as part of this involvement in the crematoria and funeral sector that when a facility is sympathetically upgraded and investment is made in good quality furniture and furnishings the overall feedback from the funeral directors and families using the site is extremely positive.

For example, Treske have been instrumental in introducing sofas into crematoria chapels which softens the hard lines of row upon row of chairs or benches and also gives the immediate family a

Cont.....

feeling of being comforted with supporting arms and softer cushions. This feature has been used by one or two crematoria on the continent and these contemporary features are now finding their way into crematoria here in the UK.

We understand that the CMA is of the opinion that quality is somehow 'not important' to the consumer when deciding which crematorium to choose. All we can say is that is a contradiction to our experience of the sector. Both private and public sector clients are facing increasing demands for better quality which seems to be driven by a reduction in religious funerals meaning that more and more families are choosing to hold 'full services' at crematoria rather than going to church first. When you consider that around 60% of UK funerals (full services) are now held within crematoria, this trend is understandable.

To this end, Treske have also seen the flip side of this investment coin when we have visited sites which have been underinvested (in both the private and public sectors). Our overall view from those sites we have encountered is that they are often desperate for investment and that carpets, furniture and seating all need to be replaced. If this is done quickly and cheaply it tends to be a very short-term fix as high traffic sites (such as crematorium and funeral chapels) require furniture and furnishings which can stand up to regular daily wear and tear. Treske always try and focus the customer on long term value which does require larger investment, but we strongly believe that buying better can have longer term benefits. This might involve sourcing better quality seating in the main chapel, using harder wearing fabrics for the seats, and maybe also trying to steer clients towards buying solid wood furniture instead of items made from veneers or plastic laminates. Solid wood has the combined benefit of being able to be refurbished some years down the line instead of being replaced (less environmental impact) and it also adds a natural element of quality and warmth to a place where families can say goodbye to their love ones in a comfortable and respectful setting.

Treske have also noticed an increase in the number of councils now investing heavily in either building brand new crematoria facilities or upgrading existing sites. The councils that have invested in not just the building, but also the furniture and furnishings inside that building have reported back to us a very positive response from those using the chapel. Council run crematoria always highlight to us that they want to make sure they are buying the very best for their facility with the reasoning that they want to 'spend the money once' and not have to face another expensive refurbishment just a few years down the line.

### **The need for further crematoria investment and the risks of price regulation**

Despite significant investment from a number of crematoria operators in the last 4-5 years, based on our experience there still remain significant differences in quality across crematoria in this country. A cremation is not a commodity like product that can be regulated at a single national (or regional) price in a "one-size-fits-all" approach to pricing. Such a move would turn the market into a postcode lottery on quality / value for money for the consumer.

Treske will continue to work very closely with UK funeral directors and crematoria operators to ensure that quality standards are maintained and that the three main areas of 'quality, longevity and comfort' are tackled equally and without compromise. However, the environment to do so will be much more challenging if price regulations are imposed which do not recognise the important role that quality plays in families' experience.

Cont.....

We therefore ask that the CMA consider the following points:

- Quality of crematoria does matter to the consumer
- In responding to this demand from the consumer (for greater quality), Treske has played a role in delivering extensive investment programmes to design and refurbish existing crematoria to a high standard
- There is still a significant difference in the quality of crematoria across the UK
- To this end, it is not a uniform commodity product and as such, a maximum pricing regulation would be very difficult to implement without resulting in worse outcomes for the consumer

We hope our small contribution and feedback on the UK Funeral and Crematorium sector will in some way help the CMA to come to the right conclusion in their current investigation.

Yours sincerely,

Russell Clynch  
TRESKE LTD