

Dear Sirs,

I have written to you out of concern regarding certain proposals contained within your Draft Order published 15/04/2021.

Is the Standardised Price List (see Part A to Schedule 1 of the draft Order) appropriately presented?

Although the presentation of the content *within* the document is acceptable, the problematic element is how the CMA proposes this information be displayed. I refer particularly to displaying pricing information in branch windows. We feel that this is unnecessary alongside the other rules around regarding displaying this information, and that it serves no purpose other than to cheapen the aesthetic of business fronts that people have worked hard to create and maintain. In no other industry that we are aware of, is this required, and do not believe it to be a fair proposal.

Do you agree with the items that are included under the Attended Funeral and Unattended Funeral (see Part B and Part C to Schedule 1 of the draft Order)?

Both pricelists are missing an area to display the cost of embalming. We understand that this may not be considered a requirement by some, however, we believe that this is very much a necessary step in providing bereaved families the standard of service they deserve and expect. Bereaved families are consulting a professional service to arrange all the practical elements of a funeral to the highest standard, and this cannot be achieved without embalming. The wider implications of discouraging embalming are that there is an entire industry at stake whereby less embalming means less work/jobs for the thousands of embalmers throughout the country. A failure to recognise this would be counterproductive to what the CMA would appear to be trying to achieve, by taking away jobs and lowering the overall standard of the funeral industry.

Articles 9 and 10 of the Order require Funeral Directors with five or more branches and ten or more branches to provide certain information to the CMA. Schedule B and Schedule C to the Explanatory Note list funeral directors with five or more branches and ten or more branches respectively.

This section may be the most troublesome and intrusive. Particularly section 9 (7) where funeral directors with fewer than five branches are required to share the same information as those with five or more, upon request, to the CMA. The CMA requiring private businesses to provide commercially sensitive information such as total number of funerals carried out within a year is irrelevant to anyone except management, especially relating to small businesses where there are no concerns around monopolising. We strongly object to this section in its entirety, and urge that it be reconsidered, before being finalised.

Kind Regards,

Gordon D. Stewart
Director.