

Funerals sector

Annual review of market outcomes

7 August 2025

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Summary

1. On 18 December 2020, the Competition and Markets Authority (CMA) issued its [final report](#) following a market investigation into the supply of funerals and related goods and services in the United Kingdom. The CMA found that the markets for funeral director services at the point of need and crematoria services were not functioning well and that a number of features restricted or distorted competition.
2. In response, the CMA implemented a package of ‘sunlight remedies’, including the legally binding Funerals Market Investigation Order 2021 (the [Order](#)). The Order is intended to support consumers when choosing a funeral director or crematorium by improving the transparency of price and service information provided to consumers to enable them to choose funeral services that best meet their needs and budget.¹
3. In addition to the Order, the CMA made a recommendation to the UK government and the devolved administrations in Northern Ireland and Wales to establish in England, Northern Ireland, and Wales an inspection and registration regime to monitor the quality of funeral director services, as a first step in the establishment of a broader regulatory regime for funeral services in these nations.²
4. The CMA also recommended that the CMA Board should:
 - (a) actively monitor market outcomes in the funerals sector, in order to identify and, where possible, address any harmful behaviour;
 - (b) publish an annual review of market outcomes in the funerals sector; and
 - (c) consider at the earliest opportunity, when the impact and consequences of the COVID-19 pandemic on the funerals sector are sufficiently understood and the sector is more stable, whether to consult on a future market investigation reference (MIR).³

¹ The Order also prohibited funeral directors from entering into or conducting certain arrangements with a hospital, hospice, care home, or other similar institution which could reasonably be understood to encourage, incentivise or require the institution to refer customers to the funeral director or give that funeral director preference over other funeral directors; and soliciting for business through coroner and police contracts. However, the focus of our review has been on the price and service transparency requirements in the Order.

² The CMA did not make a recommendation to the Scottish government, as there is an existing regulatory regime for funeral services in Scotland.

³ To assist the CMA in monitoring the funerals sector, the Order requires large funeral directors (ie those operating five or more branches) and all crematorium operators to provide the CMA with specific price and volume information on the goods and services that they provide to customers.

5. During the market investigation, the CMA gave serious consideration to price control regulation. The CMA considered that while transparency measures to improve the competitive process were valuable, they were unlikely to be sufficient to address the competition problems it identified in the market, with the circumstances following a bereavement meaning consumers would have significant difficulty in engaging with the purchasing process in general, and the issue of price in particular. However, the COVID-19 pandemic, and the essential public health response to it, severely restricted the CMA's ability to design and calibrate all the remedies that it otherwise might have under more normal circumstances. The CMA considered that consumers may in the future require a level of protection beyond the measures introduced through the Order.
6. This report is the third annual review of market outcomes in the funerals sector. To inform this review and to enable the CMA Board to decide whether to consult on a further MIR, we have carried out an extensive insight-gathering exercise, enabling us to gather views and evidence from a range of stakeholders, including funeral directors, crematorium operators, trade associations, academics, consumer groups, and other interested parties, about how the funerals sector has changed since the market investigation. We have also analysed the revenue and volume information provided to the CMA by large funeral directors and all crematorium operators under the Order to understand how the average revenue per funeral and cremation has changed since the market investigation.
7. We summarise our findings below and then set out the CMA Board's final decision on whether to consult on a further MIR.

Cost to funeral directors and crematorium operators of conducting a funeral

8. During the market investigation, the CMA found that the level of profits earned by the largest funeral directors had declined over the last few years of the period under review from 2014 to 2018, but that profits remained significant. The decline in profitability was due to an increase in costs and a fall in prices.⁴ The CMA also found that from 2014 to 2018, crematorium operators representing a substantial portion of the crematorium market made profits persistently above the level the CMA would expect to see in a well-functioning market, some substantially so.⁵

⁴ Funerals market investigation summary of final report, paragraph 21.

⁵ Funerals market investigation summary of final report, paragraph 22.

9. Some respondents to our insight-gathering exercise told us that there had been a significant increase in the cost to funeral directors and crematorium operators of conducting a funeral, while others noted no material difference. Where cost increases were observed, they appear to have been driven primarily by rising inflation and increased regulatory costs.
10. Our analysis of the publicly available financial information of the large funeral directors from 2015 to 2023 indicates that their profitability levels fell due to, in part, increasing costs, particularly during the period following the market investigation. The increasing prevalence of lower-cost unattended funerals also reduced the profitability of the two largest funeral directors, The Co-operative Group Limited (Co-op) and Dignity plc (Dignity).
11. Although the large crematorium operators also faced increasing costs during this period, their profitability levels were more stable than those of the large funeral directors. This may reflect the high levels of concentration and high barriers to entry in the crematorium market, in part due to the challenges with establishing a new crematorium, including obtaining planning permission, thus resulting in reduced competition and less downward pressure on prices in the crematorium market.

Price of a funeral to consumers

12. Our analysis during the market investigation showed that prices for both funeral director and crematoria services had been increasing above the rate of inflation for a significant period of time. For example, our analysis showed that funeral directors' professional services fees⁶ and the amount spent on the cost of services provided by third parties⁷ had increased consistently above levels of inflation between 2006 and 2019.⁸
13. Respondents to our insight-gathering exercise told us that the price of a funeral had increased since the market investigation, as some funeral directors and crematorium operators sought to partially offset their increasing costs by increasing their prices. However, respondents also suggested that the price increases following the market investigation appeared to have slowed, and were below the corresponding rate of inflation, when compared with the rate of price increases that were above the corresponding rate of inflation during the period preceding the market investigation.

⁶ The professional fee includes collection and care of the deceased, hearse and attendants and director, one limousine, use of the chapel of rest, attending to all essential documentation and an oak veneer coffin.

⁷ This includes costs such as the crematorium or burial site, the doctor and the minister/celebrant.

⁸ Funerals market investigation final report, paragraph 2.30.

14. Our analysis of the revenue and volume information provided to the CMA by large funeral directors and all crematorium operators under the Order since the market investigation presents a moderately positive picture when compared with the analysis conducted during the market investigation, although we note that the data is not directly comparable:
- (a) For funeral directors operating five or more branches and funeral directors operating 10 or more branches, the increase in the overall average revenue per funeral was below the corresponding rate of inflation for the period from 1 September 2021 to 31 August 2024, meaning that the average revenue per funeral for both sets of funeral directors⁹ was lower in real terms in 2024 than in 2021. However, for the year ended 31 August 2024, we have observed increases above inflation for the average revenue per funeral for funeral directors operating 10 or more branches and, in particular, for unattended funerals.
 - (b) For crematorium operators, the increase in the overall average revenue per cremation was below the corresponding rate of inflation for the period from 1 September 2021 to 31 August 2024, meaning that the average revenue per cremation was lower in real terms in 2024 than in 2021. However, for the year ended 31 August 2024, we have observed increases above inflation for the overall average revenue per cremation, for standard fee attended services and, in particular, for unattended cremation services.
15. There may be several factors driving the trends we have observed since the market investigation. The enforced simplification of funerals during the height of the COVID-19 pandemic may still be continuing to affect consumers' choice of funeral. For example, consumers may be purchasing simpler or unattended funeral services and/or spending less on additional products and services, as evidenced by the increasing popularity of unattended funeral services, albeit attended funeral services remain the norm for most consumers. The increasing prevalence of unattended funerals and the entry of direct cremation providers in recent years may represent a positive outcome for consumers, as consumers are able to benefit from a greater choice of funerals. The transparency measures introduced by the Order, as well as the CMA's ongoing monitoring of the sector, may also be having some constraining effects on funeral prices, although we have not seen evidence to suggest that the Order has directly caused a reduction in funeral prices.

⁹ The set of funeral directors operating five or more branches includes those operating 10 or more branches.

16. These factors suggest that we may not see a sustained period of price increases above the corresponding rate of inflation as was observed during the period leading up to the market investigation. However, we note that there have more recently been above-inflation increases for some funeral types, particularly unattended funerals, and for larger funeral directors and crematoria. We intend to monitor closely the information we receive from large funeral directors and all crematorium operators under the Order to understand whether this is a short-term readjustment in response to the recent period of high inflation or a sustained return to high levels of price increases similar to those observed prior to the market investigation.

Quality of funeral services

17. During the market investigation, the CMA received evidence from a broad range of organisations and individuals indicating that at least some funeral directors were perceived as providing unacceptable levels of quality in relation to their back-of-house facilities and processes. While the CMA was not in a position to establish how widespread those problems may have been, the importance of proper care of the deceased to the bereaved, the lack of transparency of back-of-house services provided by funeral directors, the widespread recognition across the sector that there were incidents of failure to meet appropriate standards, and the absence of a regulatory regime (contrary to the expectation of most consumers) outside of Scotland, meant that consumers could not be assured that the quality levels they would expect would always be met.¹⁰
18. Respondents to our insight-gathering exercise identified factors, such as cost increases, rising inflation, and increasing scrutiny on funeral prices, which may risk having an adverse impact on the quality of funeral services. However, they noted that the introduction of a statutory regulatory framework for funeral services in Scotland is intended to improve and maintain quality standards, and this could improve the quality of service in the rest of the UK for at least some funeral directors if larger funeral directors standardise their practices across the UK.
19. Since the market investigation, the Independent Inquiry into the issues raised by the David Fuller case ([the Fuller Inquiry](#)) was established to investigate how David Fuller was able to carry out inappropriate and unlawful actions in

¹⁰ The CMA did not prioritise analysis of quality issues in relation to the provision of back-of-house crematorium services given a lack of evidence or representations in relation to back-of-house quality. With regard to front of house, overall, the CMA considered that crematoria were likely to be delivering acceptable levels of front-of-house quality.

the mortuaries at Maidstone and Tunbridge Wells NHS Trust and why they went apparently unnoticed. While the issues raised in the Fuller Inquiry do not necessarily indicate that the quality of funeral services has deteriorated across the funerals sector or that issues are becoming more widespread since the market investigation, we consider that they reinforce the findings of the market investigation that such issues can arise, with significant negative consequences for consumers, and that there remain insufficient checks and balances to prevent this from happening in England, Northern Ireland and Wales.

Consumer awareness of the quality of funeral services

20. During the market investigation, the CMA found that consumers valued the quality of the service they received throughout the funeral arrangement and delivery process, but they could not easily judge this until after they had made the purchase and sometimes not even then.¹¹ The CMA also found that consumers cared about how their loved one was looked after but may not be able to make a well-informed assessment of how well this requirement was met in practice. The CMA found that most people believed, incorrectly, that funeral directors were subject to statutory regulation.¹²
21. Respondents to our insight-gathering exercise told us that the increased scrutiny of the funerals sector, including the CMA's market investigation, the FCA's regulation of funeral plans, and increased media interest, may have increased consumer awareness of the risks of poor-quality funeral services, particularly in relation to the back-of-house services that consumers are unable to assess and observe. However, we have not found evidence to suggest that consumers are generally more aware of the quality of funeral services being provided to them or are more able to assess quality than during the market investigation. There is also no indication that the factors which prevented consumers from assessing the quality of back-of-house services, and taking this into account in their choices, have changed since the market investigation. This means that competition alone is unlikely to improve or maintain the quality of funeral services and to prevent or address issues when they occur, which indicates independent regulatory oversight is necessary.

¹¹ Funerals market investigation final report, paragraph 5.11.

¹² Funerals market investigation final report, paragraph 3.134.

Impact of the Order on funeral directors, crematorium operators, and consumers

22. During the market investigation, the CMA found that consumers found it extremely difficult to engage with the process of purchasing a funeral. This was not only because of the emotional vulnerability that would affect many in the period before and following the death of a loved one, but also because of numerous other factors that conspired against their ability to exercise choices in the way they normally would when faced with such an important purchase: social pressures and seeking to do the right thing for the deceased; pressure to make decisions quickly; conflicting demands on their time and energy, when they were short of both; lack of basic understanding or practical experience of what organising a funeral entailed, having to do so very seldom in their lives.¹³
23. The CMA also found that the bereaved typically placed their trust in the funeral director to guide them to the most suitable option for them. When it came to choosing a funeral, customers (including the least well-off) were insensitive to price, although in recent years affordability had become a significant issue for some. In the absence of clear market pressures from customers, funeral directors largely relied on their own judgement to gauge what they thought their customers needed. This manifested itself most noticeably in the way they imparted pricing information, which was often provided late in the sales process. Prices often could not be obtained in a comparable format online or on the telephone and, once customers met the funeral director to make the initial funeral arrangements, they were highly unlikely to switch to another provider.¹⁴
24. The Order was introduced to ensure that prior to purchasing funeral services, consumers could find out the price that they will be paying and the terms of business; what services they will be getting for that price; and any other relevant business, financial, and commercial interests of the funeral director.
25. We have not seen evidence to suggest that the Order has significantly changed consumer behaviour in the form of increased price comparison or shopping around for funeral services. As the CMA found during the market investigation, the low level of customer engagement caused by the intrinsically challenging circumstances surrounding the purchase of a funeral

¹³ Funerals market investigation summary of final report, paragraphs 8 and 9.

¹⁴ Funerals market investigation summary of final report, paragraphs 10 and 12.

means price and service transparency may not drive significantly increased consumer engagement.

26. Despite this, we do consider that the increased transparency brought about by the Order provides benefits to consumers. To the extent that consumers are able and willing to do so, it may help them to assess the cost of, and compare, different funeral directors. Greater price transparency also makes it easier for consumers to choose funeral services that meet their needs and budget and make it less likely that consumers are surprised by the final cost of the funeral.
27. We recognise that complying with the Order places some additional administrative burden and cost on funeral directors and crematorium operators. However, we consider this to be modest and proportionate to the benefits of increasing the transparency of price and service information for consumers.

Evolution of the funerals sector

28. Respondents to our insight-gathering exercise told us that they expect the funerals sector to remain under close scrutiny by the CMA, the FCA and government and that the increased costs of regulation may be passed on to consumers in the form of increased prices. They also expect that, while attended funerals will remain the norm for most consumers, there will be increasing demand for unattended funeral services.

Decision on whether to consult on an MIR

29. In deciding whether to consult on a further MIR, the CMA Board has considered whether there is a feature or combination of features in the supply of funeral services that prevents, restricts or distorts competition, and if so, whether an MIR is an appropriate and proportionate response to address those features.
30. During the market investigation, the CMA found that the markets for funeral director services at the point of need and crematoria services were not functioning well and that a number of features restricted or distorted competition:
 - (a) Low level of customer engagement caused by the intrinsically challenging circumstances surrounding the purchase of a funeral.

- (b) Lack of easily accessible and clearly comparable information on the products and services provided by funeral directors, including their prices and levels of quality.
 - (c) Lack of visibility to customers of the level of quality of care given to the deceased by funeral directors.
 - (d) High barriers to entry in the supply of crematoria services.
 - (e) High levels of local concentration in the supply of crematoria services.¹⁵
31. The evidence and views we have collected to inform this annual review indicates that these features have not materially changed, except for the availability of easily accessible and clearly comparable information on the prices of products and services provided by funeral directors, which has been addressed by the introduction of the Order.
32. In response to the low level of customer engagement caused by the intrinsically challenging circumstances surrounding the purchase of a funeral, a further market investigation could assess whether further protections for consumers, such as additional transparency measures or price control regulation, were necessary.
33. We do not believe that introducing further transparency measures would be appropriate, as we do not consider that such measures would improve the competitive process in the funerals sector. This is because consumers' circumstances following a bereavement mean they have significant difficulty in engaging with the purchasing process in general, and the issue of price in particular.
34. We also do not believe that introducing price control regulation would be appropriate. The responses to our insight-gathering exercise suggest that price increases following the market investigation appeared to have slowed and were below the corresponding rate of inflation. Similarly, our analysis of the revenue and volume information provided to the CMA by large funeral directors and all crematorium operators under the Order since the market investigation also presents a moderately positive picture when compared with the above inflation increases in prices during the period leading up to the market investigation. Additionally, we consider that there is a risk that the introduction of price control regulation in the absence of independent regulation of the quality of funeral services in England, Northern Ireland, and Wales may encourage funeral directors to reduce their costs to maintain their

¹⁵ Funerals market investigation summary of final report, paragraph 18.

profit margins, which could lead to a reduction in the quality of funeral services.¹⁶ Finally, implementing effective price control regulation for a heterogenous product/service like a funerals package would be challenging, as funeral directors could circumvent the remedy by introducing and marketing more prominently a different funerals package to that subject to the price control regulation.

35. In response to the lack of visibility to customers of the quality of care given to the deceased by funeral directors, we do not think it would be appropriate to consult on a further market investigation. This is because important aspects of the quality of funeral services are not observable and therefore, the CMA would not be able to introduce remedies to improve the competitive process in this regard. This was recognised by the CMA in its market investigation, leading it to recommend to the UK government and devolved administrations in Northern Ireland and Wales to establish in England, Northern Ireland and Wales an inspection and registration regime to monitor the quality of funeral director services.
36. We remain of the view that independent, statutory regulation of funeral services is necessary to improve and maintain quality outcomes in England, Northern Ireland and Wales, as is being implemented in Scotland. We have not seen evidence to suggest that issues with quality have become more widespread since the market investigation. However, the concerns raised by the Fuller Inquiry indicate that it is still the case that issues with quality can arise with significant negative consequences for consumers. As per the market investigation recommendation, regulation could initially take the form of the establishment of an inspection and registration regime to monitor the quality of funeral director services, as a first step in the establishment of a broader regulatory regime for funeral services in these nations. We stand ready to support the UK government and devolved administrations in Northern Ireland and Wales in developing the appropriate regulatory framework for funeral services in England, Northern Ireland and Wales.
37. If regulation of the quality of funeral services in England, Northern Ireland and Wales is introduced, as well as improving and maintaining quality standards, this could support the introduction of price control regulation. However, any assessment of the viability and appropriateness of price control regulation would need to be carried out once quality regulation had been put in place, taking into account the prevailing market conditions and the challenges of implementing price control regulation for a heterogenous product. We will

¹⁶ The acknowledged the relationship between quality regulation and price control regulation in the funerals market investigation final report, paragraph 9.144a.

continue to monitor the revenue and volume information provided to the CMA by large funeral directors and all crematorium operators under the Order and provide this information to the UK government and devolved administrations in Northern Ireland and Wales to support our ongoing engagement with them on the regulation of the quality of funeral services in England, Northern Ireland and Wales.

38. Given the factors set out above, the CMA Board has decided not to consult on a further MIR. Moving forward, we will not publish any further annual reviews of market outcomes in the funerals sector, but we will continue to monitor the information we receive under the Order. We will also apply the lessons we have learned in the design, implementation, and monitoring and enforcement of the Order to future market investigations, including the CMA's ongoing market investigation into veterinary services for household pets.

Introduction

39. On 18 December 2020, the CMA issued its final report following a market investigation into the supply of funerals and related goods and services in the United Kingdom.
40. The CMA found that the markets for funeral director services at the point of need and crematoria services were not functioning well and that a number of features restricted or distorted competition:
- (a) Low level of customer engagement caused by the intrinsically challenging circumstances surrounding the purchase of a funeral.
 - (b) Lack of easily accessible and clearly comparable information on the products and services provided by funeral directors, including their prices and levels of quality.
 - (c) Lack of visibility to customers of the level of quality of care given to the deceased by funeral directors.
 - (d) High barriers to entry in the supply of crematoria services.
 - (e) High levels of local concentration in the supply of crematoria services.¹⁷
41. At the root of the CMA's findings was the observation that most customers, unsurprisingly, find it extremely difficult to engage with the process of purchasing a funeral. This is not only because of the emotional vulnerability

¹⁷ Funerals market investigation summary of final report, paragraph 18.

that will affect many in the period before and following the death of a loved one, but also because of numerous other factors that conspire against their ability to exercise choices in the way they normally would when faced with such an important purchase: social pressures and seeking to do the right thing for the deceased (when often they do not know what the deceased would have wanted); pressure to make decisions quickly; conflicting demands on their time and energy, when they are short of both; lack of basic understanding or practical experience of what organising a funeral entails, having to do so very seldom in their lives. As a result, when choosing a funeral director, people largely follow a personal recommendation (which often provides only scant information as to why it is made) or simply go back to the funeral director that they or their family have previously used, even though this may have been in the distant past and the ownership of the business may have changed in the meantime.¹⁸

42. To address these concerns, the CMA implemented a package of 'sunlight remedies' – shining a light on the pricing and back-of-house practices of the sector – to support customers when making choices about funerals and to ensure that the pricing, business, and commercial activities of funeral directors and crematoria, as well as the quality of the service that funeral directors provide, were exposed to greater public and regulatory scrutiny.
43. The sunlight remedies include the Order, which was introduced to ensure that prior to purchasing funeral services, consumers could find out the price that they will be paying and the terms of business; what services they will be getting for that price; and any other relevant business, financial, and commercial interests of the funeral director. This means that consumers are better placed to choose funeral services that meet their needs and budget.¹⁹
44. In addition to the Order, the CMA made a recommendation to the UK government and the devolved administrations in Northern Ireland and Wales to establish in England, Northern Ireland, and Wales an inspection and registration regime to monitor the quality of funeral director services, as a first step in the establishment of a broader regulatory regime for funeral services in these nations.

¹⁸ Funerals market investigation summary of final report, paragraphs 8 and 9.

¹⁹ The Order also prohibited funeral directors from entering into or conducting certain arrangements with a hospital, hospice, care home, or other similar institution which could reasonably be understood to encourage, incentivise or require the institution to refer customers to the funeral director or give that funeral director preference over other funeral directors; and soliciting for business through coroner and police contracts. However, the focus of our review has been on the price and service transparency requirements in the Order.

45. The CMA also recommended that the CMA Board should:
- (a) actively monitor market outcomes in the funerals sector, in order to identify and, where possible, address any harmful behaviour;
 - (b) publish an annual review of market outcomes in the funerals sector; and
 - (c) consider at the earliest opportunity, when the impact and consequences of the COVID-19 pandemic on the funerals sector are sufficiently understood, and the sector is more stable, whether to consult on a future MIR.
46. During the market investigation, the CMA gave serious consideration to price control regulation. The CMA considered that while transparency measures to improve the competitive process were valuable, they were unlikely to be sufficient to address the competition problems it identified in the market, due to the circumstances following a bereavement meaning consumers would have significant difficulty in engaging with the purchasing process in general, and the issue of price in particular. However, the COVID-19 pandemic, and the essential public health response to it, severely restricted the CMA's ability to design and calibrate all the remedies that it otherwise might have under more normal circumstances. The CMA considered that consumers may in the future require a level of protection beyond the measures introduced through the Order.
47. This report is the third annual review of market outcomes in the funerals sector. To inform this review, we have undertaken a broader review of the funerals sector to enable the CMA Board to consider whether to consult on a further MIR. We have considered the following issues:
- (a) How the cost to funeral directors and crematorium operators of conducting a funeral has changed since the market investigation.
 - (b) How the price of a funeral to consumers has changed since the market investigation.
 - (c) How the quality of funeral services has changed since the market investigation.
 - (d) The extent to which consumer awareness of quality has changed since the market investigation.
 - (e) How the Order has impacted funeral directors and crematorium operators.
 - (f) How the Order has impacted consumers.

(g) How the funerals sector is likely to evolve in the next five to ten years.

48. To inform the broader review of the funerals sector, we carried out an extensive insight-gathering exercise, seeking views and evidence directly from a range of stakeholders, including funeral directors, crematorium operators, trade associations, academics, consumer groups and other interested parties, about how the funerals sector has changed since the market investigation. We have also analysed the revenue and volume information provided to the CMA by large funeral directors and all crematorium operators under the Order to understand how the average revenue per funeral and cremation has changed since the market investigation.

Findings

Cost to funeral directors and crematorium operators of conducting a funeral

49. During the market investigation, the CMA found that the level of profits earned by the largest funeral directors declined over the last few years of the period under review from 2014 to 2018, but that profits remained significant. The decline in profitability was due to an increase in costs and a fall in prices.²⁰ The CMA also found that from 2014 to 2018, crematorium operators representing a substantial portion of the crematorium market made profits persistently above the level the CMA would expect to see in a well-functioning market, some substantially so.²¹
50. To understand how the cost to funeral directors and crematorium operators of conducting a funeral has changed since the market investigation, we have considered responses to our insight-gathering exercise and examined the publicly available financial information of the large funeral directors and crematorium operators.

Responses to our insight-gathering exercise

51. We received mixed views on the cost to funeral directors and crematorium operators of conducting a funeral since the market investigation. Some respondents told us that there has been a significant increase in the cost of

²⁰ Funerals market investigation summary of final report, paragraph 21.

²¹ Funerals market investigation summary of final report, paragraph 22.

conducting a funeral since the market investigation, while others noted no material difference.

52. Respondents who told us that costs had increased since the market investigation identified the following key contributing factors: increases in staff costs, energy costs, and regulatory costs, including the cost of complying with the Order and the FCA's Consumer Duty and its regulation of funeral plans. Other notable cost increases identified by respondents included fleet purchasing and maintenance, coffins, flowers, mortuary supplies, insurance, rent and rates, and interest on debt. For example:
- (a) A.W. Lymn told us that the cost of wages, vehicles and fleet insurance and maintenance following the market investigation had risen at double digit percentages and that this increase was more than the increase in general inflation.
 - (b) Co-op submitted that cost pressures had increased with the latest inflationary cycle. It highlighted that, compared with the period prior to and during the market investigation, the cost of raw materials, fuel, energy, labour, and rent had increased.
 - (c) Dignity reported that the level of cost inflation since the market investigation had been unprecedented and noted increases in staff, energy, and regulatory costs.
 - (d) The National Society of Allied and Independent Funeral Directors (SAIF) told us that there were inflationary pressures from 2022 to 2024 with utilities and third-party products rising at an exponential rate during this period and that funeral homes had absorbed as much of these cost pressures as they could withstand. SAIF also told us that the inflationary prices occurred from rising costs of electricity, gas, coffin prices, fuel and vehicle parts, crematorium pricing and a whole plethora of ongoing costs, including staff salaries.

Analysis of publicly available financial information on largest funeral directors and crematorium operators

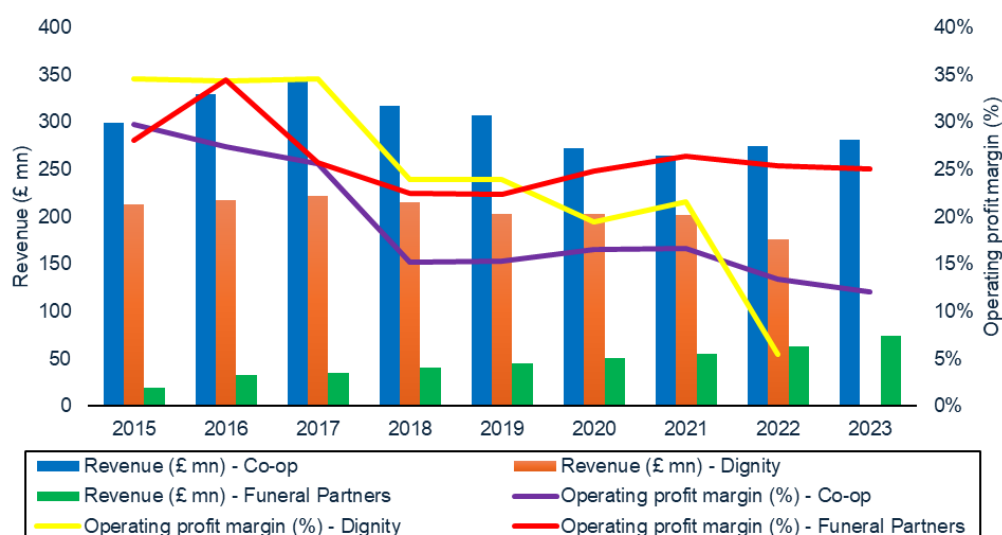
53. We analysed the publicly available financial information of the large funeral directors and crematorium operators to understand the movement in operating profit margin for the period from 2015 to 2023. The length of the period enabled us to observe trends prior to and following the market investigation, in order to understand the impact of the CMA's intervention, as well as the COVID-19 pandemic, on the cost of funeral services.

Funeral directors

54. We analysed the publicly available financial information of the three largest funeral directors in the UK: Co-op, Dignity, and Funeral Partners Limited (Funeral Partners). In 2023, Co-op conducted 95,978 funerals and operated from 811 funeral homes.²² In 2022, Dignity conducted 77,000 funerals and operated from 725 funeral branches.²³ Funeral Partners is the third largest funeral services provider with 240 branches and conducts over 20,000 funerals every year.²⁴

55. Figure 1 shows the trends in revenue and operating profit margin for Co-op, Dignity, and Funeral Partners for the period from 2015 to 2023.

Figure 1: Co-op, Dignity, and Funeral Partners revenue and operating profit margin performance, 2015 to 2023



Source: CMA analysis.

Notes:

1. The operating profit margin is the pre-exceptional earnings before interest, tax, depreciation and amortisation (EBITDA). This provides an accurate view of profitability, as it excludes one-off exceptional items.
2. For Co-op, we used the Co-op Group annual report and accounts. The financial statements provide a separate breakdown of revenue and profitability for Co-op's funerals division.
3. For Dignity, we used the annual report and accounts for Dignity Plc. We note that following its delisting from the London Stock Exchange in 2023, Dignity no longer reports separately the profitability of its funeral director and crematorium divisions. Therefore, we do not provide revenue and operating profit margin figures for 2023. We allocated central costs for Dignity's funeral director and crematorium divisions as a percentage of their divisional revenue.
4. For Funeral Partners, we used the company's annual strategic report, report of the directors and financial statements filed at Companies House.
5. Financial years are aligned with the majority of the year (eg Funeral Partners' 2023 financial year ends in September 2023 and is therefore aligned to 2023 in Figure 1).

²² Co-op Annual Report 2023, page 265.

²³ Dignity Annual Report 2022, page 7.

²⁴ Funeral Partners website.

56. Co-op reported a decline in operating profit over the review period due to an increase in costs. The cost increases following the market investigation appeared to be higher than the cost increases immediately preceding the market investigation, as the company reported significant inflationary cost increases²⁵ and additional regulatory costs²⁶ during that period. We note that Co-op's operating profit and operating profit margin for the most recent year was the lowest reported over the review period, in part caused by Co-op absorbing the inflationary cost increases.²⁷ We also observed that the increased sales of unattended funerals had an adverse impact on Co-op's profitability.²⁸ We note that during the COVID-19 pandemic, Co-op reported a small increase in operating profit margin from 2020 to 2021. Co-op notes in its 2021 annual report that this was, in part, driven by strong cost control and the removal of restrictions on ceremonies.²⁹
57. Dignity reported a decline in operating profit over the review period due to a fall in revenue and an increase in costs. The cost increases following the market investigation appeared to be higher than the cost increases immediately preceding the market investigation due to an increase in inflationary cost pressures, most notably salary costs, in recent years.³⁰ We observed that Dignity reported its lowest operating profit and operating profit margin over the review period in 2022, in part due to increased costs. We also note that a reduction in average revenue per funeral, driven by the increasing popularity of lower cost unattended funerals, also adversely impacted Dignity's profitability over the review period.³¹ During the COVID-19 pandemic, Dignity reported a small decline in operating profit margin in 2020. Our analysis suggests that this was caused by the increased revenue (arising as a result of an increase in the number of funerals) being offset by a combination of a decline in prices and an increase in costs.³² According to our analysis, this was a temporary issue, as the operating profit margin increased marginally in 2021, as costs declined faster than revenue.
58. Funeral Partners reported a stable operating profit and operating profit margin over the review period. In 2023, the company highlighted the impact on its business of inflationary cost pressures and how it had managed these increasing costs to maintain its operating profit margin. Our analysis suggests

²⁵ [Co-op Annual Report 2023](#), page 32.

²⁶ [Co-op Annual Report 2022](#), page 53.

²⁷ [Co-op Annual Report 2023](#), page 32.

²⁸ [Co-op Annual Report 2018](#), page 7.

²⁹ [Co-op Annual Report 2021](#), page 36.

³⁰ [Dignity Annual Report 2022](#), page 72.

³¹ [Dignity Annual Report 2022](#), page 71.

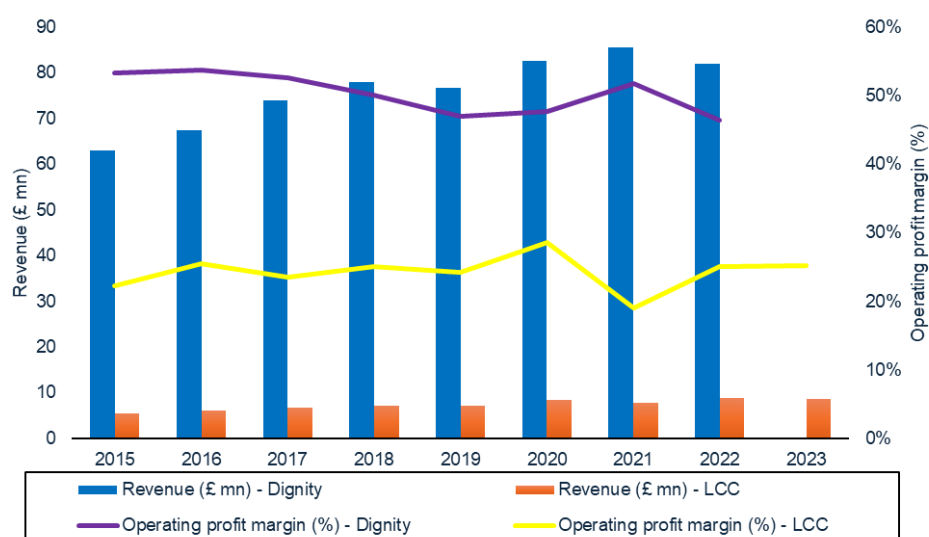
³² [Dignity Annual Report 2020](#), page 18.

that during the COVID-19 pandemic, Funeral Partners reported a small increase in operating profit margin from 2020 to 2021, as revenue grew at a faster rate than operating costs.³³ We note that these figures include 14 acquisitions completed during 2020 and 2021.³⁴

Crematorium operators

59. We analysed the publicly available financial information for two of the four largest crematorium operators: Dignity and London Cremation Company (LCC).³⁵ The largest crematorium operator, Dignity, owned 46 crematoria and performed 75,500 cremations in 2022.³⁶ LCC operates six crematoria.³⁷
60. Figure 2 shows the trends in revenue and operating profit margin for Dignity's crematorium division and LCC for the period from 2015 to 2023.

Figure 2: Dignity and LCC revenue and operating profit margin performance, 2015 to 2023



Source: CMA analysis.

Notes:

1. The operating profit margin is the pre-exceptional EBITDA. This provides an accurate view of profitability, as it excludes one-off exceptional items.
2. For Dignity, we used the annual report and accounts for Dignity Plc. We note that following its delisting from the London Stock Exchange in 2023, Dignity no longer reports separately the profitability of its funeral director and crematorium divisions.

³³ [Funeral Partners Limited filing history](#), full accounts made up to 30 September 2023, page 2.

³⁴ [Funeral Partners Limited filing history](#), full accounts made up to 30 September 2021, page 2 and full accounts made up to 30 September 2021, page 3.

³⁵ We did not analyse the financial performance of the two other large crematorium operators, Westerleigh Group and Memoria Funerals, as the financial information required for our analysis was not publicly available.

³⁶ [Dignity Annual Report 2022](#), page 7.

³⁷ [LCC website](#).

Therefore, we do not provide revenue and operating profit margin figures for 2023. We allocated central costs for Dignity's funeral directors and crematorium divisions as a percentage of their divisional revenue.

3. For LCC, we used the annual report and financial statements filed at Companies House.

4. Financial years are aligned with the majority of the year (eg LCC's 2024 financial year ends in March 2024 and is therefore aligned to 2023 in Figure 2).

61. Dignity's crematorium division reported higher and more stable operating profit margins than its funeral director division for the review period. Dignity reported its lowest profit margin over the review period in 2022, in part driven by a higher cost base, particularly utility costs.³⁸
62. LCC reported a stable profit margin over the review period.
63. Both crematorium operators reported a small increase in operating profit margin at the start of the COVID-19 pandemic. In 2021, Dignity noted that its operating profit increased due to an increase in revenue, as crematorium grounds were fully open for all of 2021 compared with being closed in the second quarter of 2020 due to the COVID-19 pandemic restrictions.³⁹

Conclusion

64. From our insight-gathering exercise, we have found a mixed picture regarding the extent to which the cost to funeral directors and crematorium operators of conducting a funeral has increased since the market investigation. Where costs have increased, these appear to have been primarily driven by inflationary pressures and increased regulatory scrutiny.
65. From our analysis of the publicly available financial information of the large funeral directors and crematorium operators, we have found that:
 - (a) the decline in profitability for the large funeral directors during the period from 2015 to 2023 was driven, in part, by increasing cost pressures, particularly during the period following the market investigation. The increasing prevalence of unattended funerals also reduced the profitability of Dignity and Co-op; and
 - (b) although the large crematorium operators have also faced increasing costs, their profitability levels remained more stable during the period from 2015 to 2023. This may reflect high levels of concentration and barriers to entry in the crematorium market, in part due to the challenges with establishing a new crematorium, including obtaining planning permission,

³⁸ [Dignity Annual Report 2022](#), page 74.

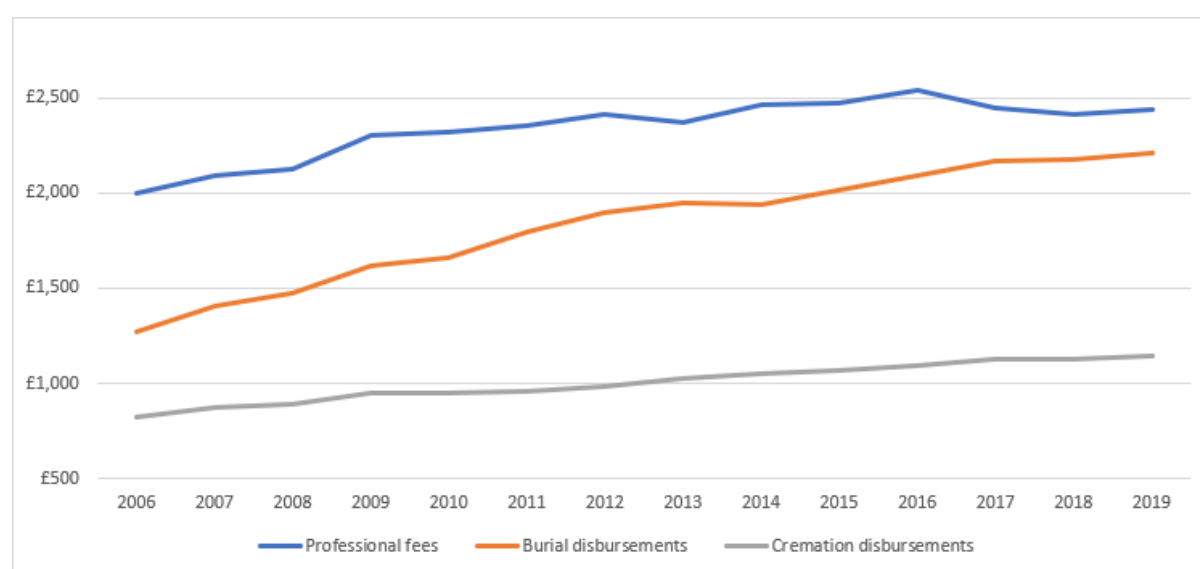
³⁹ [Dignity Annual Report 2021](#), page 61.

thus resulting in reduced competition and less downward pressure on prices in the crematorium market.

Price of a funeral to consumers

66. Our analysis during the market investigation showed that prices for both funeral director and crematoria services had been increasing above the rate of inflation for a significant period of time. For example, our analysis showed that funeral directors' professional services fees⁴⁰ and the amount spent on the cost of services provided by third parties⁴¹ had increased consistently above levels of inflation between 2006 and 2019 (see Figure 3).⁴²

Figure 3: Average professional fee, and burial and cremation disbursements in real terms (2018 prices), 2006-2019



Source: CMA analysis based on information collected during the funerals market investigation.

Note: Professional fee, burial disbursements and cremation disbursements are weighted by funeral director share of supply.

67. To understand how the price of a funeral to consumers has changed since the market investigation, we have considered responses to our insight-gathering exercise, analysed the revenue and volume information we receive from large funeral directors and all crematorium operators under the Order, and considered SunLife Limited's (SunLife) 2025 Cost of Dying report.

⁴⁰ The professional fee includes collection and care of the deceased, hearse and attendants and director, one limousine, use of the chapel of rest, attending to all essential documentation and an oak veneer coffin.

⁴¹ This includes costs such as the crematorium or burial site, the doctor and the minister/celebrant.

⁴² Funerals market investigation final report, paragraph 2.30.

Responses to our insight-gathering exercise

68. We received mixed views on whether the price of a funeral to consumers has increased since the market investigation.
69. Some funeral directors and crematorium operators told us that the price of a funeral had increased following the market investigation in response to the increase in their operating costs, although some funeral directors noted that the price increases had been below the corresponding rate of inflation. However, other funeral directors noted no material difference in prices. For example:
- (a) Co-op told us that the average selling price for Co-op's Tailored funerals declined in real terms over the period from 2021 to 2023 and, as at 2023, the average selling price was still at the lowest level in nominal terms since 2015 and at the lowest level in real terms since 2013. Co-op also told us that the average selling price for Co-op's Essential funerals also declined in real terms over the period from 2021 to 2023.
 - (b) Dignity submitted that following the market investigation, it lowered the prices of its funeral director services significantly for standard funerals, simple funerals, and direct cremations. Dignity also submitted that it did not increase its crematorium prices during the period at the height of the COVID-19 pandemic.
 - (c) A crematorium operator told us that it had observed modest, below general inflation increases in prices since 2020.
70. A few respondents commented specifically on the price of unattended funerals. Kate Woodthorpe and The Individual Funeral Company told us that the increasing prevalence of unattended funerals had been driven by an accelerated awareness of unattended funerals as a result of the COVID-19 pandemic and significant marketing spend by direct cremation providers. Southern Co-op told us that the price of unattended funerals had remained steady, but that the price of bespoke funerals had increased.

Analysis of revenue and volume information provided by funeral directors and crematorium operators under the Order

71. The Order requires large funeral directors⁴³ and all crematorium operators to provide the CMA with specific revenue and volume information on the goods and services they provide to customers, in order to help the CMA monitor the

⁴³ Those funeral directors operating five or more branches.

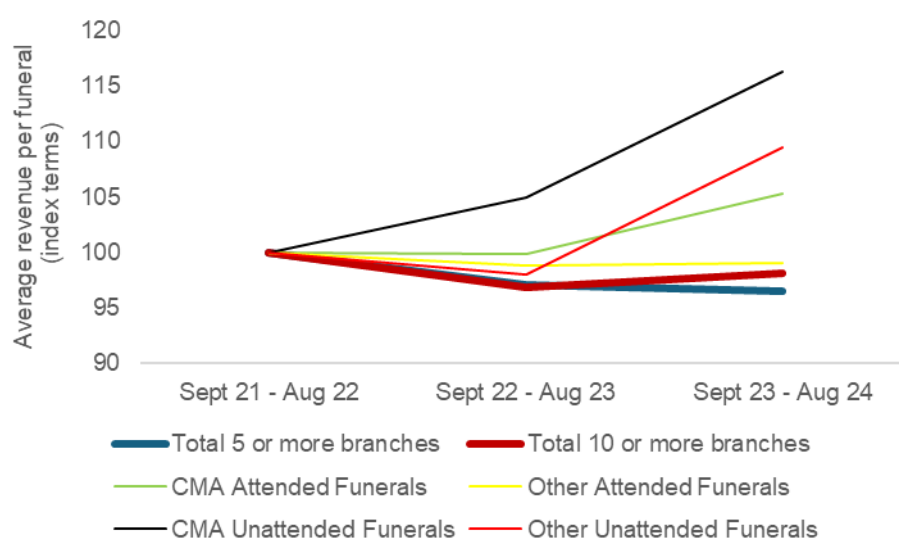
funerals sector. We have set out the information we have analysed for this review in Appendix A.

Funeral directors

Summary of findings

72. Figure 4 shows the real terms change in the average revenue per funeral (in index terms) for the period 1 September 2021 to 31 August 2024.

Figure 4: Real terms average revenue per funeral for funeral directors operating five or more branches and funeral directors operating 10 or more branches (overall and by funeral type), 2021 to 2024



Source: CMA analysis.

Note:

1. We have adjusted the average revenue for inflation using the Consumer Price Index (CPI).

2. The analysis of average revenue by funeral type is based on the revenue and volume information received from funeral directors with 10 or more branches.

73. Figure 4 shows that:

- (a) for funeral directors operating five or more branches, funeral directors operating 10 or more branches, and Other Attended Funerals, the increase in the average revenue per funeral was below the corresponding rate of inflation for the period from 1 September 2021 to 31 August 2024, meaning that the average revenue per funeral for both sets of funeral

directors⁴⁴ and for Other Attended Funerals was lower in real terms in 2024 than in 2021;⁴⁵

- (b) for CMA Attended Funerals, CMA Unattended Funerals, and Other Unattended Funerals, the increase in the average revenue per funeral was above the corresponding rate of inflation for the period from 1 September 2021 to 31 August 2024, meaning that the average revenue per funeral for CMA Attended Funerals, CMA Unattended Funerals and Other Unattended Funerals was higher in real terms in 2024 than in 2021; and
- (c) for the year ended 31 August 2024, we have also observed increases above inflation for the average revenue per funeral for funeral directors operating 10 or more branches, CMA Attended Funerals and, in particular, for both CMA Unattended and Other Unattended Funerals.

Detailed findings

- 74. Table 1 shows that for funeral directors operating five or more branches, the average revenue per funeral for the period from 1 September 2023 to 31 August 2024 was £2,788, an increase of 1.7% from the average revenue per funeral from 1 September 2022 to 31 August 2023 of £2,732 and below with the corresponding rate of inflation. This follows an increase of 3.5% in the average revenue per funeral for the period from 1 September 2022 to 31 August 2023 compared with the average revenue per funeral for the period from 1 September 2021 to 31 August 2022, which was below the corresponding rate of inflation.⁴⁶

⁴⁴ The set of funeral directors operating five or more branches includes those operating 10 or more branches.

⁴⁵ We note that some of the variation we have observed in the real terms fall in the overall average revenue per funeral may reflect cost increases being passed through at different speeds, but still below CPI levels.

⁴⁶ In Appendix B, we have analysed the information provided by funeral directors separately for April 2024 (to cover the six-month period from 1 September 2023 to 28 February 2024) and October 2024 (to cover the six-month period from 1 March 2024 to 31 August 2024).

Table 1: Average revenue per funeral for funeral directors operating five or more branches, 2021 to 2024

	1 September 2023 to 31 August 2024			1 September 2022 to 31 August 2023			1 September 2021 to 31 August 2022		
	Total	% change (YoY)	CPI % change (YoY)	Total	% change (YoY)	CPI % change (YoY)	Total	% change (YoY)	CPI % change (YoY)
Total revenue (excluding disbursements)	£816,720,886	-3.8%		£848,965,762	17.8%		£720,481,249	n/a	n/a
Total number of funerals arranged	293,946	-5.4%		310,798	13.8%		273,002	n/a	n/a
Average revenue per funeral	£2,778	1.7%	2.2%	£2,732	3.5%	6.7%	£2,639	n/a	n/a

Source: Information collected by the CMA from funeral directors operating five or more branches.

Note: The information in the table is based on submissions from 62, 75 and 74 funeral directors for the years ending 31 August 2022, 31 August 2023, and 31 August 2024 respectively.

75. Table 2 shows that for funeral directors operating 10 or more branches, the average revenue per funeral for the period from 1 September 2023 to 31 August 2024 was £2,745, an increase of 3.5% from the average revenue per funeral for the period from 1 September 2022 to 31 August 2023 of £2,652 and above the corresponding rate of inflation. This follows an increase of 3.0% in the average revenue per funeral for the period from 1 September 2022 to 31 August 2023 compared with the average revenue per funeral for the period from 1 September 2021 to 31 August 2022 which was below the corresponding rate of inflation.

Table 2: Average revenue per funeral for funeral directors operating 10 or more branches (total), 2021 to 2024

	1 September 2023 to 31 August 2024			1 September 2022 to 31 August 2023			1 September 2021 to 31 August 2022		
	Total	% change (YoY)	CPI % change (YoY)	Total	% change (YoY)	CPI % change (YoY)	Total	% change (YoY)	CPI % change (YoY)
Total revenue (excluding disbursements)	£712,961,248	-1.2%		£721,364,262	12.0%		£644,288,588	n/a	n/a
Total number of funerals arranged	259,696	-4.5%		272,044	8.4%		251,073	n/a	n/a
Average revenue per funeral	£2,745	3.5%	2.2%	£2,652	3.0%	6.7%	£2,566	n/a	n/a

Source: Information collected by the CMA from funeral directors operating 10 or more branches.

Note: The information in the table is based on submissions from 24, 27, and 29 funeral directors for the years ending 31 August 2022, 31 August 2023, and 31 August 2024 respectively.

76. Table 3 shows that for funeral directors operating 10 or more branches for the period from 1 September 2023 to 31 August 2024:

- (a) the average revenue per funeral for attended funerals was significantly higher than the average revenue per funeral for unattended funerals;
- (b) although there has been a gradually rising trend in the purchase of unattended funerals, the majority of funerals were attended (87% compared with 89% for the period from 1 September 2022 to 31 August 2023) and the majority of revenue was generated from attended funerals (95% compared with 96% for the period from 1 September 2022 to 31 August 2023). Within the attended funerals category, Other Attended remains the most commonly chosen funeral type (61% compared with 59% for the period from 1 September 2022 to 31 August 2023);
- (c) the increase in the average revenue per funeral for CMA Unattended Funerals of 13.3% and Other Unattended Funerals of 14.4% was significantly higher than the 7.7% increase for CMA Attended Funerals and the 2.4% increase for Other Attended Funerals; and
- (d) the average revenue per funeral for CMA Unattended Funerals of £1,051 remains below the average revenue per funeral of Other Unattended Funerals of £1,178.

Table 3: Average revenue per funeral for funeral directors operating 10 or more branches (by funeral type), 2021 to 2024

1 September 2023 to 31 August 2024									
	CMA Attended Funerals	% change (YoY)	Other Attended Funerals	% change (YoY)	CMA Unattended Funerals	% change (YoY)	Other Unattended Funerals	% change (YoY)	CPI % change (YoY)
Total revenue (excluding disbursements)	£184,733,025	-6.7%	£491,984,508	-0.4%	£26,231,567	24.6%	£10,012,148	20.7%	
Total number of funerals arranged	69,033	-13.4%	157,209	-2.7%	24,954	10.0%	8,500	5.8%	
Average revenue per funeral	£2,676	7.7%	£3,129	2.4%	£1,051	13.3%	£1,178	14.1%	2.2%
1 September 2022 to 31 August 2023									
	CMA Attended Funerals	% change (YoY)	Other Attended Funerals	% change (YoY)	CMA Unattended Funerals	% change (YoY)	Other Unattended Funerals	% change (YoY)	CPI % change (YoY)
Total revenue (excluding disbursements)	£197,981,023	10.1%	£494,038,782	10.4%	£21,052,053	69.6%	£8,292,405	87.5%	
Total number of funerals arranged	79,696	3.3%	161,636	4.6%	22,678	51.5%	8,034	79.3%	
Average revenue per funeral	£2,484	6.6%	£3,056	5.5%	£928	11.9%	£1,032	4.6%	6.7%

1 September 2021 to 31 August 2022

	CMA Attended Funerals	% change (YoY)	Other Attended Funerals	% change (YoY)	CMA Unattended Funerals	% change (YoY)	Other Unattended Funerals	% change (YoY)	CPI % change (YoY)
Total revenue (excluding disbursements)	£179,831,362	n/a	£447,622,295	n/a	£12,413,392	n/a	£4,421,539	n/a	
Total number of funerals arranged	77,162	n/a	154,459	n/a	14,972	n/a	4,480	n/a	
Average revenue per funeral	£2,331	n/a	£2,898	n/a	£829	n/a	£987	n/a	n/a

Source: Information collected by the CMA from funeral directors operating 10 or more branches.

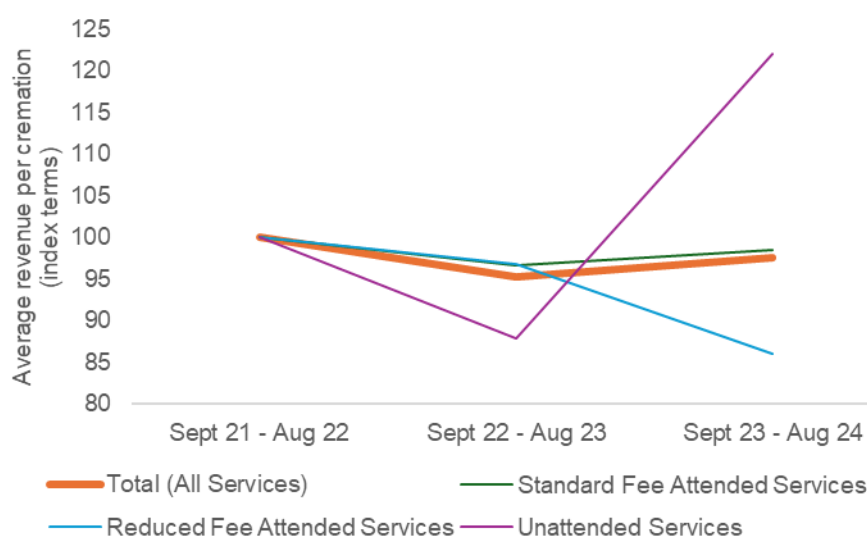
Note: The information in the table is based on submissions from 24, 27, and 29 funeral directors for the years ending 31 August 2022, 31 August 2023, and 31 August 2024 respectively.

Crematorium operators

Summary of findings

77. Figure 5 shows the real terms change in the average revenue per cremation (in index terms) for the period from 1 September 2021 to 31 August 2024.

Figure 5: Real terms average revenue per cremation (overall and by cremation type), 2021 to 2024



Source: CMA analysis.

Note:

1. We have adjusted the average revenue for inflation using the Consumer Price Index (CPI).

78. Figure 5 shows that the increase in the overall average revenue per cremation was below the corresponding rate of inflation for the period from 1 September 2021 to 31 August 2024, meaning that the average revenue per

cremation was lower in real terms in 2024 than in 2021.⁴⁷ However, for the year ended 31 August 2024, we have observed increases above inflation for the overall average revenue per cremation, the average revenue per cremation for standard fee attended services and, in particular, for the average revenue per cremation for unattended cremation services. We note that the significant increase in inflation-adjusted average revenue per cremation for unattended cremation services is, in part, driven by the high average revenue per cremation of a large direct cremation provider entering our dataset for the first time in the most recent year. As such, we consider that the significant increase in inflation-adjusted average revenue per unattended cremation for the year ending 31 August 2024 is largely a mix effect.

Detailed findings

79. Table 4 shows that the average revenue per cremation for the period from 1 September 2023 to 31 August 2024 was £862, an increase of 4.8% from the average revenue per cremation for the period from 1 September 2022 to 31 August 2023 of £822 and above the corresponding rate of inflation. This follows an increase of 1.6% in the average revenue per cremation for the period from 1 September 2022 to 31 August 2023 compared with the average revenue per cremation for the period from 1 September 2021 to 31 August 2022 which was below the corresponding rate of inflation.⁴⁸
80. Table 4 also shows that for the period from 1 September 2023 to 31 August 2024:
 - (a) the average revenue per cremation for Standard Fee Attended Services was significantly higher than the average revenue per cremation for Reduced Fee Attended Services and Unattended Services;
 - (b) the increase in the average revenue per cremation for Unattended Services of 42.0% was significantly higher than the increase in average revenue per cremation for Standard Fee Attended Services of 4.1%. We note that this significant increase is partially explained by the high average revenue per cremation of a large direct cremation provider entering our dataset for the first time in the most recent year. After removing this provider from our dataset, the average revenue per cremation for Unattended Services for the period from 1 September 2023

⁴⁷ We note that some of the variation we have observed in the real terms fall in the overall average revenue per cremation may reflect cost increases being passed through at different speeds, but still below CPI levels.

⁴⁸ In Appendix C, we have analysed the information provided by crematorium operators separately for April 2023 (to cover the two quarters from 1 September 2023 to 28 February 2024) and October 2024 (to cover the two quarters from 1 March 2024 to 31 August 2024).

to 31 August 2024 was £395, an increase of 9.5% from the average revenue per cremation for Unattended Services for the period from 1 September 2022 to 31 August 2023 of £361; and

- (c) although the trend towards Unattended Cremations has continued, the majority of cremations were Attended Services (81% compared with 84% for the period from 1 September 2022 to 31 August 2023) and the majority of revenue was generated from Attended Services (89% compared with 93% for the period from 1 September 2022 to 31 August 2023).

Table 4: Average revenue per cremation, 2021 to 2024

1 September 2023 to 31 August 2024									
	<i>Standard Fee Attended Services</i>	<i>% change (YoY)</i>	<i>Reduced Fee Attended Services</i>	<i>% change (YoY)</i>	<i>Unattended Services</i>	<i>% change (YoY)</i>	<i>Total</i>	<i>% change (YoY)</i>	<i>CPI % change (YoY)</i>
Total revenue	£284,664,453	-14.3%	£9,498,424	4.4%	£36,506,564	39.2%	£330,669,440	-10.0%	
Total revenue from memorials							£30,161,432	-11.4%	
Total number of cremations carried out	297,463	-17.7%	15,135	14.9%	71,230	-1.9%	383,828	-14.2%	
Average revenue per cremation	£957	4.1%	£628	-9.0%	£513	42.0%	£862	4.8%	2.2%
1 September 2022 to 31 August 2023									
	<i>Standard Fee Attended Services</i>	<i>% change (YoY)</i>	<i>Reduced Fee Attended Services</i>	<i>% change (YoY)</i>	<i>Unattended Services</i>	<i>% change (YoY)</i>	<i>Total</i>	<i>% change (YoY)</i>	<i>CPI % change (YoY)</i>
Total revenue	£332,064,232	46.9%	£9,101,038	27.5%	£26,222,991	49.1%	£367,388,262	46.5%	
Total revenue from memorials							£34,027,813	14.3%	
Total number of cremations carried out	361,415	42.5%	13,167	23.4%	72,611	59.0%	447,197	44.2%	
Average revenue per cremation	£919	3.1%	£691	3.3%	£361	-6.2%	£822	1.6%	6.7%
1 September 2021 to 31 August 2022									
	<i>Standard Fee Attended Services</i>	<i>% change (YoY)</i>	<i>Reduced Fee Attended Services</i>	<i>% change (YoY)</i>	<i>Unattended Services</i>	<i>% change (YoY)</i>	<i>Total</i>	<i>% change (YoY)</i>	<i>CPI % change (YoY)</i>
Total revenue	£226,037,102	n/a	£7,140,621	n/a	£17,591,728	n/a	£250,769,451	n/a	
Total revenue from memorials							£29,766,679		
Total number of cremations carried out	253,702	n/a	10,667	n/a	45,674	n/a	310,043	n/a	
Average revenue per cremation	£891	n/a	£669	n/a	£385	n/a	£809	n/a	n/a

Source: Information collected by the CMA from crematorium operators.

Note: The information in the table is based on submissions from 114, 158 and 158 crematorium operators for the years ending 31 August 2022, 31 August 2023 and 31 August 2024 respectively.

SunLife's 2025 Cost of Dying report

81. SunLife is a financial services company which provides a range of products and services, primarily aimed at people aged 50 and over. Since 2004, SunLife has published an annual Cost of Dying report, which explores funeral costs over time, as well as how people pay for funerals, changing attitudes towards funerals, and how the funerals sector is evolving.
82. Research to inform the 2025 Cost of Dying report⁴⁹ was undertaken by Critical Research on behalf of SunLife, using two methods:
- (a) Interviews with 100 funeral directors across the UK (10 funeral directors per region), conducted in May to July 2024. The data on pricing below is from this research.
 - (b) Interviews with 1,511 individuals who have been involved in organising a funeral over the past four years, conducted in June to July 2024. 39% of the funeral organisers interviewed had arranged a funeral within the past 12 months.
83. During the market investigation, we conducted a detailed analysis of the underlying data from the research with funeral directors that SunLife had used to inform its Cost of Dying reports, testing various adjustments to address submissions raised by different parties regarding the reliability of the data and methodology, and weighting it alongside other data sources.⁵⁰ For the purposes of this review, we have drawn on publicly available findings from SunLife's Cost of Dying reports for both funeral directors and funeral organisers and have not analysed the underlying data informing the reports.
84. We reviewed the 2024 and 2025 Cost of Dying reports to enable us to compare this information with the revenue and volume information we have received under the Order since the market investigation⁵¹ and with CPI over that period.⁵² The 2024 and 2025 Cost of Dying reports show that:

⁴⁹ SunLife 2025 Cost of Dying Report.

⁵⁰ Appendix N: Funeral directors' pricing levels and trends, paragraphs 16 to 25.

⁵¹ The data from SunLife is not directly comparable to the revenue and volume data we collect, as it is based on the cost of a specific set of services (as described in more detail below) rather than revenues across all services. This provides a useful additional perspective on price changes, as it represents a more 'like-for-like' comparison over time.

⁵² The ONS annual average Consumer Prices Index increased by 10% between 2022 and 2024 (from 121.7 to 133.9). Source: ONS [Consumer Price Inflation Tables](#), Table 15a.

- (a) SunLife's estimate of what it defines as the 'cost of dying'⁵³ increased by 6.5% from £9,200 in 2022 to £9,797 in 2024;⁵⁴
- (b) the weighted average 'cost of a simple attended funeral'⁵⁵ increased by 8.4% from £3,953 in 2022 to £4,285 in 2024 (following reductions in the previous two years);⁵⁶
- (c) the average cost of a cremation (including disbursements)⁵⁷ increased by 8.4% from £3,673 in 2022⁵⁸ to £3,980 in 2024;⁵⁹
- (d) the average cost of a burial (including disbursements) increased by 8.4% from £4,794⁶⁰ in 2022 to £5,198 in 2024;⁶¹
- (e) the cost of a direct cremation increased by 5.7% from £1,511 in 2022⁶² to £1,597 in 2024⁶³ and the cost of a direct burial decreased by 7.8% from £1,657 in 2023 to £1,527 in 2024;⁶⁴ and
- (f) there are significant regional disparities in funeral costs across the UK. London remains the most expensive region for funerals, with the average cost of a funeral (a weighted average of cremation and burial costs) reaching £5,449 in 2024, while Northern Ireland remains the most affordable, with an average cost of a funeral of £3,441 in 2024.^{65,66}

⁵³ SunLife's 'cost of dying' includes the cost of the funeral plus professional fees (ie how much funeral organisers spent on hiring a professional to administer the estate) and optional 'send-off' costs. Send-off costs include a memorial, death and funeral notices, flowers, order sheets, additional limousines, and the venue and catering for the wake.

⁵⁴ SunLife 2025 Cost of Dying Report, page 3 and SunLife 2024 Cost of Dying Report, page 7.

⁵⁵ SunLife's cost for a simple attended funeral includes a burial or cremation with a service, funeral director fees, a mid-range coffin, one funeral limousine, as well as doctor and celebrant fees. The cost of a simple attended funeral is calculated as a weighted average of attended burials and cremations, with their individual prices balanced according to their relative popularity.

⁵⁶ SunLife 2025 Cost of Dying Report, page 8.

⁵⁷ The main components of the cremation costs are the funeral directors' professional fee and the crematorium fee.

⁵⁸ SunLife 2024 Cost of Dying Report, page 12.

⁵⁹ SunLife 2025 Cost of Dying Report, page 9.

⁶⁰ SunLife 2024 Cost of Dying Report, page 12.

⁶¹ SunLife 2025 Cost of Dying Report, page 9.

⁶² SunLife 2024 Cost of Dying Report, page 12.

⁶³ SunLife 2025 Cost of Dying Report, page 9.

⁶⁴ SunLife began recording data for direct burials only in 2023.

⁶⁵ SunLife 2025 Cost of Dying Report, page 10.

⁶⁶ The average cremation and burial costs above have not been adjusted to account for differences in regional population and funeral volumes.

Conclusion

85. Respondents to our insight-gathering exercise told us that the price of a funeral had increased since the market investigation, as some funeral directors and crematorium operators sought to partially offset their increasing costs by increasing their prices. However, respondents also suggested that the price increases following the market investigation appeared to have slowed, and were below the corresponding rate of inflation, when compared with the rate of price increases that were above the corresponding rate of inflation during the period preceding the market investigation.
86. Our analysis of the revenue and volume information provided to the CMA by large funeral directors and all crematorium operators under the Order since the market investigation presents a moderately positive picture when compared with the analysis conducted during the market investigation:⁶⁷
- (a) For funeral directors operating five or more branches and funeral directors operating 10 or more branches, the increase in the overall average revenue per funeral was below the corresponding rate of inflation for the period from 1 September 2021 to 31 August 2024, meaning that the average revenue per funeral for both sets of funeral directors⁶⁸ was lower in real terms in 2024 than in 2021. However, for the year ended 31 August 2024, we have observed increases above inflation for the average revenue per funeral for funeral directors operating 10 or more branches and, in particular, for unattended funerals.
 - (b) For crematorium operators, the increase in the overall average revenue per cremation was below the corresponding rate of inflation for the period from 1 September 2021 to 31 August 2024, meaning that the average revenue per cremation was lower in real terms in 2024 than in 2021. However, for the year ended 31 August 2024, we have observed increases above inflation for the overall average revenue per cremation, the average revenue per cremation for standard fee attended services and, in particular, for the average revenue per cremation for unattended cremation services.
87. We consider that the increases in the average revenue per funeral and cremation since the market investigation reflect the increased costs faced by both funeral directors and crematorium operators in recent years. Funeral directors have experienced cost increases following the market investigation

⁶⁷ We note that the information provided to the CMA under the Order is not directly comparable to the information used to inform the analysis during the market investigation.

⁶⁸ The set of funeral directors operating five or more branches includes those operating 10 or more branches.

that appear to be higher than the cost increases they experienced prior to the market investigation. Crematorium operators have faced similar cost increases, although they appear to have been able to maintain their profit margins since the market investigation.

88. Although we are unable to directly compare the information we collect under the Order with the information that SunLife collects to inform its Cost of Dying reports, the SunLife information also shows a real terms decline in the cost of a funeral between 2022 and 2024. SunLife's information serves as a useful reference point when considering the cost of a funeral to consumers, in considering how the price of a specific set of funeral services has changed since the market investigation to allow a more like-for-like comparison over time. However, we have placed greater weight on the revenue and volume information we collect under the Order, as this information provides greater coverage across the UK and for different funeral types and the information requirements of the Order are legally binding on funeral directors and crematorium operators.
89. There may be several factors driving the trends we have observed since the market investigation. The enforced simplification of funerals during the height of the COVID-19 pandemic may still be continuing to affect consumers' choice of funeral. For example, consumers may be purchasing simpler or unattended funeral services and/or spending less on additional products and services, as evidenced by the increasing popularity of unattended funeral services, albeit attended funeral services remain the norm for most consumers. The increasing prevalence of unattended funerals and the entry of direct cremation providers in recent years may represent a positive outcome for consumers, as consumers are able to benefit from a greater choice of funerals. The transparency measures introduced by the Order, as well as the CMA's ongoing monitoring of the sector, may also be having some constraining effects on funeral prices, although we have not seen evidence to suggest that the Order has directly caused a reduction in funeral prices.
90. We consider that there are two possible reasons that explain why the average revenue per funeral may be increasing at a slower rate than inflation: lower increases in price for a given set of funeral services that consumers purchase and/or consumers buying fewer or cheaper funeral services. To the extent it is driven by the first factor, we consider that the below-inflation overall increase in the average revenue per funeral we have observed since the market investigation represents a better outcome for consumers than the trajectory of funeral prices before the market investigation, which were rising at a faster rate than general inflation for many years. Where it is driven by the second factor, this may also represent a positive trend if the services purchased

represent better value for money for consumers and meet their expectations as to what they want from the funeral service.

91. These factors suggest that we may not see a sustained period of price increases above the corresponding rate of inflation as was observed during the period leading up to the market investigation. However, we note that there have more recently been above-inflation increases for some funeral types, particularly unattended funerals, and for larger funeral directors and crematoria. We intend to monitor closely the information we receive from large funeral directors and all crematorium operators under the Order to understand whether this is a short-term readjustment in response to the recent period of high inflation or a sustained return to high levels of price increases similar to those observed prior to the market investigation.

Quality of funeral services

92. During the market investigation, the CMA found that in respect of front-of-house services that consumers can observe, the relevance to consumers of past experience and recommendations in their choice of funeral director meant there was a degree of competitive pressure acting on the quality of this aspect of funeral director services. However, this was often determined by the funeral director's own view as to what was 'right' to offer to their customers rather than in response to the offering of their local competitors. Overall, the CMA did not find widespread serious concerns about the quality of the front-of-house services provided by funeral directors.⁶⁹
93. With respect to the back-of-house funeral services that consumers are unable to observe, the CMA found that back-of-house quality was not a significant parameter of competition between funeral directors, creating the scope for poor quality outcomes to both arise and persist.⁷⁰
94. During the market investigation, the CMA received evidence from a broad range of organisations and individuals indicating that at least some funeral directors were perceived as providing unacceptable levels of quality in relation to their back-of-house facilities and processes. While the CMA was not in a position to establish how widespread those problems may have been, the importance of proper care of the deceased to the bereaved, the lack of transparency of back-of-house services provided by funeral directors, the widespread recognition across the sector that there were incidents of failure to meet appropriate standards, and the absence of a regulatory regime (contrary

⁶⁹ Funerals market investigation final report, paragraph 5.96.

⁷⁰ Funerals market investigation final report, paragraph 5.177.

to the expectation of most consumers) outside of Scotland, meant that consumers could not be assured that the quality levels they would expect would always be met.⁷¹

95. Since the conclusion of the market investigation, there have been two significant developments relevant to the quality of funeral services:
- (a) The Scottish Government continued its implementation of a regulatory regime for funeral services in Scotland, pursuant to the Burial and Cremation (Scotland) Act 2016. Most recently, the Scottish Government introduced a statutory [Funeral Director Code of Practice](#) in February 2024, with the aim that ‘every person in Scotland will have a dignified and respectful funeral and bereaved families can be reassured that good standards of care will be provided.’ Inspectors will carry out inspections against the requirements set out in the code. Full compliance with the Code has been required since 1 March 2025.
 - (b) The Fuller Inquiry was established in November 2021 to investigate how David Fuller was able to carry out inappropriate and unlawful actions in the mortuaries at Maidstone and Tunbridge Wells NHS Trust and why they went apparently unnoticed. Phase 2 of the Fuller Inquiry looked at the broader national picture and considered whether procedures and practices in other hospital and non-hospital settings (including funeral directors), where deceased people are kept, safeguard the security and dignity of the deceased. The [Phase 2 Interim Report](#) was published in October 2024 and the [final Phase 2 Report](#) in July 2025.
96. To understand how the quality of funeral services has changed since the market investigation, we have considered responses to our insight-gathering exercise, the experiences of the Scottish Government in establishing a regulatory regime for funeral services in Scotland, and the findings of the Fuller Inquiry.

Responses to our insight-gathering exercise

97. The majority of respondents told us there had been no change in the quality of funeral services since the market investigation, although some respondents told us that a combination of rising costs and increasing price competition had resulted in a deterioration in quality. As per the findings of the market

⁷¹ The CMA did not prioritise analysis of quality issues in relation to the provision of back-of-house crematorium services given a lack of evidence or representations in relation to back-of-house quality. With regard to front of house, overall, the CMA considered that crematoria were likely to be delivering acceptable levels of front-of-house quality.

investigation, some respondents reported instances of poor quality, while others told us that high quality standards were being maintained. Some respondents highlighted the growth of online providers leading to reduced quality levels, although they did not provide evidence of lower quality among such providers.

98. Specific comments on the quality of funerals services included:

- (a) Allcock Family Funeral Services expressed concerns that the quality of care of the deceased in direct cremations may be overlooked in many cases. It also submitted that the market investigation seemed too focused on cost rather than quality and standards, and that its cost-saving priorities may have encouraged poor standards of practice.
- (b) Co-op submitted that quality of care across the sector was impacted by certain factors outside of funeral directors' control, including, in particular, factors increasing the length of time that the deceased was in the care of the funeral director.
- (c) Dignity told us that it had introduced Standard Operating Procedures in 2023 to standardise best practice across its branches and that it expected the introduction of the Scottish Code of Conduct may have spillover effects on quality across the UK as large operators with branches across the UK would likely want to ensure a consistent level of quality and operating practices.
- (d) Funeral Partners submitted that increased focus on price in consumer decision-making may have been constraining investment in quality.
- (e) The National Association of Funeral Directors (NAFD) submitted that recent events had highlighted the need to assure quality of service. It explained that NAFD and SAIF had agreed to harmonise both member codes of practice with the Scottish code and it hoped that this standard would be adopted on a UK-wide statutory basis. NAFD stated that without a universal mandatory quality standard, some operators were able to compete on price alone without the investment required to guarantee quality.
- (f) Quaker Social Action told us that it had not seen a noticeable shift, in either direction, in the number of client cases where their helpline has logged a problem with funeral services.
- (g) SAIF submitted that since it was not mandatory that funeral directors belonged to a trade association, this left gaps where non-affiliated funeral homes were free to operate without scrutiny by a trade body.

- (h) Scotmid Funerals told us that quality had improved due to the increased regulatory focus on the funeral profession, particularly in Scotland where the move to a regulated profession had been ongoing for a number of years.

Scottish regulatory regime

99. We spoke to the Scottish Government about their preparations for the Funeral Director Code of Practice, which came into force on 1 March 2025. The Scottish Government told us that funeral directors were preparing well, were keen to comply with the Code, and recognised that the regulatory regime was intended to encourage best practice. The Scottish Government told us that only a small minority of funeral directors were not aware of the Code coming into force.
100. We also spoke to Robert Swanson, Inspector for Burial, Crematorium and Funeral Directors, and Gordon Findlater, Inspector for Anatomy, who had conducted a number of voluntary inspections of funeral directors in preparation for the Code coming into force. They told us that during their inspections, they had identified some potential issues among funeral directors regarding record-keeping and a lack of refrigeration to appropriately store the deceased. They observed some apprehension among funeral directors with regards to the Code coming into force, particularly regarding its impact on smaller funeral directors.

Fuller Inquiry

101. The Fuller Inquiry's Phase 2 Interim Report found wide variation in policies and procedures in relation to ensuring the security and dignity of the deceased across funeral directors in England. It also found examples of poor practice which had compromised the security and dignity of the deceased, and that these two findings together may indicate a systemic failure to protect the deceased through a lack of standard policies and procedures. The Interim Report noted that anyone can be a funeral director, without needing a licence, experience, qualifications, or training, and can use whatever facilities and equipment one chooses. The Interim Report found that trade association practices for monitoring standards across the sector had clear limitations.⁷²
102. The Interim Report recommended that the UK government should establish an independent statutory regulatory regime for funeral directors in England as a matter of urgency, in order to safeguard the security and dignity of the

⁷² Fuller Inquiry Phase 2 Interim Report, Chapter 3 – Conclusions and recommendations, pages 30 and 31.

deceased. The final Phase 2 Report reiterated the findings and recommendations made in the Interim Report (as Recommendations 61 to 65 in the final report).

Conclusion

103. We have not found evidence to suggest that there has been a significant change in the quality of funeral services since the market investigation.
104. Respondents to our insight-gathering exercise identified that factors such as cost increases and inflationary pressures, as well as increasing scrutiny on funerals prices, may risk having an adverse impact on the quality of funeral services. However, the introduction of a statutory regulatory framework in Scotland is intended to improve and maintain quality standards and this could improve the quality of service in the rest of the UK for at least some funeral directors if larger funeral directors standardise their practices across the UK.
105. Since the market investigation, the Fuller Inquiry was established to investigate how David Fuller was able to carry out inappropriate and unlawful actions in the mortuaries at Maidstone and Tunbridge Wells NHS Trust and why they went apparently unnoticed. While the issues raised in the Fuller Inquiry do not necessarily indicate that the quality of funeral services has deteriorated across the funerals sector as a whole or that issues are becoming more widespread since the market investigation, we consider that they reinforce the findings from the market investigation that such issues can arise, with significant negative consequences for consumers, and that there remain insufficient checks and balances to prevent this from happening in England, Northern Ireland, and Wales.

Consumer awareness of the quality of funeral services

106. During the market investigation, the CMA found that with regards to funeral director services, consumers valued the quality of the service they received throughout the funeral arrangement and delivery process, but they could not easily judge this until after they had made the purchase and sometimes not even then.⁷³ The CMA also found that consumers cared about how their loved one was looked after but they may not be able to make a well-informed assessment of how well this requirement was met in practice. The CMA found

⁷³ Funerals market investigation final report, paragraph 5.11.

that most people believed, incorrectly, that funeral directors were subject to statutory regulation.⁷⁴

107. With regards to crematorium services, the CMA found that, to the extent that some crematorium operators may attract some customers on the basis of the quality of their offering, which normally meant the underlying standard and maintenance of the buildings and grounds and the duration of the funeral service, there were not enough consumers choosing a crematorium on this basis for it to drive improved competition.⁷⁵
108. To understand how consumer awareness of the quality of funeral services has changed since the market investigation, we have considered responses to our insight-gathering exercise.

Responses to our insight-gathering exercise

109. A number of respondents reported increased consumer awareness of the quality of funeral services since the market investigation, largely due to increased media scrutiny of the funerals sector in recent years. Some respondents noted that such scrutiny had reduced consumer trust in funeral directors, meaning funeral directors were having to respond to prove their trustworthiness. However, we have not seen evidence to suggest that any increased consumer awareness of the quality of funeral services has resulted in a significant change in how consumers choose, or engage with, funeral directors.
110. Specific comments included:
 - (a) Co-op told us that consumers had become somewhat more conscious of the importance of quality of care in the funerals sector following the CMA's market investigation and the COVID-19 pandemic, and issues of quality were brought further to the fore with the Fuller Inquiry.
 - (b) Dignity submitted that increased ownership transparency may help customers to have a better understanding of the affiliation of the funeral director and thus the standards of quality they would expect to receive.
 - (c) Funeral Partners told us that there had been an increased awareness of the risks associated with bad practices in the industry, given the circumstances surrounding the Fuller Inquiry.

⁷⁴ Funerals market investigation final report, paragraph 3.134.

⁷⁵ Funerals market investigation final report, paragraph 6.81.

- (d) NAFD submitted that increasing awareness of quality could be observed for several reasons, including changing generational expectations, the use of technology, increased press attention, and developments in the external environment, including regulation by the CMA and FCA. NAFD members reported that clients were now more informed about the care their loved ones receive, but there appeared to be relatively few instances of people wishing to see for themselves where and how deceased people were cared for.
- (e) Scotmid Funerals told us that events of the past few years had perhaps given an impression to the public that quality was lacking and increased regulation was required.

Conclusion

- 111. We have found some indication that the increased scrutiny of the funerals sector, including the CMA's market investigation, the FCA's regulation of funeral plans, and increased media interest, may have increased consumer awareness of the risks of poor-quality funeral services, particularly in relation to the back-of-house services that consumers are unable to observe and assess.
- 112. However, we have not found evidence to suggest that consumers are generally more aware of the quality of funeral services being provided to them or are more able to assess quality than during the market investigation. There is also no indication that the factors which prevented consumers from assessing the quality of back-of-house services, and taking this into account in their choices, have changed since the market investigation. This means that competition alone is unlikely to improve or maintain the quality of funeral services where that is necessary and to prevent or address issues when they occur, which indicates that independent regulatory oversight is necessary.

Impact of the Order on the funerals sector

- 113. During the market investigation, the CMA found that consumers found it extremely difficult to engage with the process of purchasing a funeral. This was not only because of the emotional vulnerability that will affect many in the period before and following the death of a loved one, but also because of numerous other factors that conspire against their ability to exercise choices in the way they would normally do when faced with such an important purchase: social pressures and seeking to do the right thing for the deceased (when often they do not know what the deceased would have wanted); pressure to make decisions quickly; conflicting demands on their time and

energy, when they are short of both; lack of basic understanding or practical experience of what organising a funeral entails, having to do so very seldom in their lives.⁷⁶

114. The CMA found that the bereaved typically place their trust in the funeral director to guide them to the most suitable option for them. When it comes to choosing a funeral, customers (including the least well-off) were insensitive to price, although in recent years affordability had become a significant issue for some. In the absence of clear market pressures from customers, funeral directors largely relied on their own judgement to gauge what they thought their customers needed. This manifested itself most noticeably in the way they imparted pricing information, which was often provided late in the sales process. Prices often could not be obtained in a comparable format online or on the telephone and, once customers met the funeral director to make the initial funeral arrangements, they were highly unlikely to switch to another provider.⁷⁷
115. The Order was introduced to ensure that prior to purchasing funeral services, consumers could find out the price that they will be paying and the terms of business; what services they will be getting for that price; and any other relevant business, financial and commercial interests of the funeral director.
116. To understand how the Order has impacted the funerals sector, we have considered responses to our insight-gathering exercise and SunLife's 2025 Cost of Dying report.
117. In assessing the impact of the Order, we note that it was introduced to improve the transparency of price and service information provided to consumers and was not intended to address the broader findings of the market investigation. Further, there have been a number of significant events affecting the funerals sector since the Order was introduced, including the COVID-19 pandemic, the cost-of-living crisis, the regulation of funeral plans by the FCA, and the Fuller Inquiry, and it is not possible to disentangle the impact of the Order on the funerals sector from these broader developments.

⁷⁶ Funerals market investigation summary of final report, paragraphs 8 and 9.

⁷⁷ Funerals Market investigation summary of final report, paragraphs 10 and 12.

Responses to our insight-gathering exercise

How has the Order impacted funeral directors and crematorium operators?

118. Some funeral directors reported that the requirement to display the Standardised Price List (SPL) in their branches and on their websites was having a constraining effect on prices. However, we have not seen evidence to suggest that the Order has directly caused a reduction in funeral prices. For example:
- (a) Dignity reported that the Order had helped to ensure more standardisation and transparent prices across the industry and suppliers were more mindful of this now, so there was a greater need to set prices competitively.
 - (b) Funeral Partners told us that the Order was an additional factor (amongst several other factors) which constrained the price of funeral services in the UK and was likely to have been a factor in the below-inflation increases in funeral costs which the CMA had observed in the last two years.
 - (c) The Individual Funeral Company submitted that the Order had curbed huge price rises every year.
119. Some funeral directors reported an increased administrative burden and increased operating costs caused by complying with the Order. This includes the need to print, display, and update price lists and to review and update the prices of suppliers, such as crematorium operators. For example:
- (a) Philip Blatchly & Son Funeral Directors submitted that the time of costing, production, and putting up the posters had driven up costs, which had to be passed on to the families it served.
 - (b) Dignity reported increased operating costs relating to the need for training, compliance, and providing data to the CMA.
 - (c) The Individual Funeral Company told us that every time a crematorium changed its prices, it had to get new SPLs printed out and update its website. This could be a few times a year and required the support of an expert, which cost a few hundred pounds a year.
120. However, other funeral directors indicated that they did not consider the perceived impact on operating costs to be material or disproportionate. For example:

- (a) Co-op told us that the costs were proportionally relatively limited.
 - (b) Dignity reported that it considered such costs to be manageable.
 - (c) Funeral Partners submitted that the impact on operating costs was not material.
 - (d) Scotmid Funerals told us that costs had gone up slightly due to printing and distributing price lists, but that they considered this not unreasonable, and that there were a few costs around collating the six-monthly returns. Overall, Scotmid Funerals considered the overall impact to be negligible.
121. Some funeral directors submitted that they considered that the conduct of funeral directors had improved in respect of transparency. For example, Scotmid Funerals submitted that conduct around transparency of prices had improved.
122. Some funeral directors reported that the Order was leading to an increased focus among funeral directors on price transparency and that this risked cost-cutting and reductions in the quality of service. For example:
- (a) Allcock Family Funeral Services told us that the Order was encouraging cost cutting which could potentially lead to lower standards and quality of care.
 - (b) Funeral Partners submitted that an unintended consequence of a primary focus on price was that it could lead to certain providers compromising on quality (in particular, back-of-house quality and/or limiting investment in innovation) in favour of competing more on price.
123. We have not seen evidence to suggest that funeral directors are reducing the quality of their services in response to increasing price transparency. However, we acknowledge that this may be a risk if consumers become increasingly price sensitive.
124. We did not receive evidence to suggest that the Order has had a significant impact on crematorium operators or that the increasing scrutiny of funerals prices is placing downward pressure on cremation prices. This is likely because the Order is focused primarily on funeral directors.⁷⁸

⁷⁸ The Order imposes a number of requirements on funeral directors, covering a range of price and service transparency obligations, the prohibition of certain arrangements and the provision of specified information to the CMA. The obligations on crematorium operators are limited to price transparency and the provision of specified information to the CMA.

How has the Order impacted consumers?

125. Some respondents told us that the Order had supported changes in consumer behaviour which had driven increasing price sensitivity by enabling:
- (a) the relationship between consumers and funeral directors to become more akin to the conventional purchase of other products and services;
 - (b) consumers to shop around more effectively, for example, through increasing price comparison; and
 - (c) increased awareness of the different kinds of funerals available.
126. For example:
- (a) Co-op submitted that increased transparency had empowered consumers to shop around and make informed choices.
 - (b) Dignity told us that the most significant and direct impact of the Order related to more transparency in prices, making it easier for consumers to compare providers.
 - (c) Funeral Partners reported that, due to the Order, there was now more awareness of the packages available to consumers and their prices for both attended and unattended options.
 - (d) Scotmid Funerals submitted that the Order had improved the ability for consumers to easily compare prices and determine ownerships and check terms of business.
127. Although many respondents attributed the perceived changes in behaviour to the Order, some respondents attributed changes to broader trends, including the cost-of living crisis and increased marketing of unattended funerals and direct cremations. Some respondents argued that the Order had had no impact or very limited impact on consumers. Some funeral directors reported that they did not consider that consumers found the pricing information useful or that consumers found it confusing.
128. Some funeral directors objected to what they perceived as the increasing commodification of funeral services, feeling that it devalued an important social function or that an increased focus on price led to worse decision-making. Other respondents noted that they considered such developments to be positive, such as by empowering consumers to make better-informed choices and achieve better value for money.

SunLife's 2025 Cost of Dying report

129. In its 2025 Cost of Dying report, SunLife found that 61% of funeral directors considered that the funerals industry had improved as a result of the Order.⁷⁹
130. We also considered the research undertaken with funeral organisers. Following a material change to the wording of a key survey question in 2023, SunLife's Cost of Dying research does not provide a clear indication of the impact of the Order (if any) on consumer behaviour. Between 2017 and 2022, the proportion of funeral organisers surveyed who said they had "obtained quotes" from two or more funeral directors was largely static at circa 1 in 6 organisers (see Table 5).

Table 5: Shopping around by funeral organisers, 2017 to 2024 (SunLife)

						%	
Obtained quotes from 2+ funeral directors						Compared prices for 2+ funeral directors	
2017	2018	2019	2020	2021	2022	2023	2024
18	20	19	18	17	18	40	35

Source: CMA analysis of SunLife Cost of Dying consumer survey data.

Notes:

1. Question (2017 to 2022): How many quotes, if any, did you obtain from funeral directors for this funeral? Base: funeral organisers who arranged a funeral in the last 4 years (n=1,524, 2017; n=1,547, 2018; n=1,503, 2019; n=1,506, 2020; n=1,616, 2021; n=1,508, 2022).

2. Question (2023 to 2024): Did you compare funeral directors' prices before choosing one? and how many funeral directors did you compare prices for? Base: funeral organisers who arranged a funeral in the last 4 years (n=1,522, 2023; n=1,511, 2024).

131. However, in 2023 and 2024 (following the wording change), around twice as many survey respondents (40% and 35% respectively) reported that they had "compared prices" between at least two funeral directors, with most reporting in 2024 that they found it quite easy (55%) or very easy (32%) to do so.
132. We note that while SunLife's findings do not permit an assessment of whether the proportion of consumers who shop around has increased in absolute terms since the Order came into effect, they do indicate that, overall, a minority of consumers shop around, a situation that remains unchanged since the market investigation.⁸⁰

⁷⁹ SunLife 2025 Cost of Dying Report.

⁸⁰ Typically, the CMA considers that online surveys with members of pre-recruited respondent panels, where sample recruitment does not rely on randomisation, may be subject to bias and may not be sufficiently robust. As such, we have interpreted the SunLife consumer survey findings cautiously and at face value, considering them in the round with a range of other evidence where they appear to be indicatively informative on topics of pertinence to this review.

Conclusion

133. The Order ensures that consumers can access important information about funeral services at a time of distress and vulnerability.
134. We have not seen evidence to suggest that the Order has significantly changed consumer behaviour in the form of increased price comparison or shopping around for funeral services. As the CMA found during the market investigation, the low level of customer engagement caused by the intrinsically challenging circumstances surrounding the purchase of a funeral means price and service transparency may not drive significantly increased consumer engagement.
135. Despite this, we do consider that the increased transparency brought about by the Order provides benefits to consumers. To the extent that consumers are able and willing to do so, it may help them to assess the cost of, and compare, different funeral directors. Greater price transparency also makes it easier for consumers to choose funeral services that meet their needs and budget and make it less likely that consumers are surprised by the final cost of the funeral.
136. We recognise that complying with the Order places some additional administrative burden and cost on funeral directors and crematorium operators. However, we consider this to be modest and proportionate to the benefits of increasing the transparency of price and service information for consumers.
137. The transparency measures introduced by the Order, as well as the CMA's ongoing monitoring of the sector, may also be having some constraining effects on funeral prices, although we have not seen evidence to suggest that the Order has directly caused a reduction in funeral prices.

How will the funerals sector evolve in the next five to ten years?

138. Respondents to our insight-gathering exercise reported that they expected recent trends affecting the funerals sector to continue, in particular:
 - (a) increasing regulatory burden, whether statutory or voluntary through industry trade associations. For example, Co-op drew attention to the continued implementation of the new regulatory regime in Scotland and anticipated that regulation would follow the conclusion of the Fuller Inquiry. Funeral Partners submitted that due to events such as the Fuller Inquiry, more regulation and/or a statutory regulatory framework for the industry was both needed and inevitable; and

- (b) rising costs, driven by both inflation and increased regulatory burden. For example, Funeral Partners told us that costs to funeral directors would continue to increase due to external macro-economic factors, such as inflation. Most respondents expected such costs to be passed on to consumers.
- 139. Respondents also told us that they expected recent changes in consumer behaviour to continue, including:
 - (a) increasing price sensitivity and shopping around. For example, Funeral Partners reported that there would be more and more comparison of funeral directors in relation to the price of services provided, especially as the use of online/digital channels for information about funerals would continue to grow; and
 - (b) a shift away from traditional funerals, with continuing growth in direct cremations and unattended funerals, services conducted in more diverse settings, and the increasing personalisation of funerals. These trends would be driven by both perceived increasing cost consciousness and social changes impacting how the end of a life is marked. For example, Co-op told us that they considered that innovation in response to changing consumer preferences would continue.
- 140. In general, respondents did not expect the Order to drive significant further change beyond what had been observed to date – namely, improved pricing information accessibility for those consumers who engage in price comparison.

Decision on whether to consult on an MIR

- 141. In deciding whether to consult on a further MIR, the CMA Board has considered whether there is a feature or combination of features in the supply of funeral services that prevents, restricts or distorts competition, and if so, whether a market investigation is an appropriate and proportionate response to address those features.
- 142. During the market investigation, the CMA found that the markets for funeral director services at the point of need and crematoria services were not functioning well and that a number of features restricted or distorted competition:
 - (a) Low level of customer engagement caused by the intrinsically challenging circumstances surrounding the purchase of a funeral.

- (b) Lack of easily accessible and clearly comparable information on the products and services provided by funeral directors, including their prices and levels of quality.
 - (c) Lack of visibility to customers of the level of quality of care given to the deceased by funeral directors.
 - (d) High barriers to entry in the supply of crematoria services.
 - (e) High levels of local concentration in the supply of crematoria services.⁸¹
143. The evidence and views we have collected to inform this annual review indicates that these features have not materially changed, except for the availability of easily accessible and clearly comparable information on the prices of products and services provided by funeral directors, which has been addressed by the introduction of the Order.
144. In response to the low level of customer engagement caused by the intrinsically challenging circumstances surrounding the purchase of a funeral, a further market investigation could assess whether further protections for consumers, such as additional transparency measures or price control regulation, were necessary.
145. We do not believe that introducing further transparency measures would be appropriate, as we do not consider that such measures would improve the competitive process in the funeral sector. This is because consumers' circumstances following a bereavement mean they have significant difficulty in engaging with the purchasing process in general, and the issue of price in particular. This is illustrated by the impact of the Order on consumer behaviour. While the Order ensures that consumers are better placed to choose funeral services that best meet their needs and budget, it has not significantly changed consumer behaviour in the form of increased price comparison or shopping around for funeral services.
146. We also do not believe that introducing price control regulation would be appropriate. The responses to our insight-gathering exercise suggest that price increases following the market investigation appeared to have slowed and were below the corresponding rate of inflation. Our analysis of the revenue and volume information provided to the CMA by large funeral directors and all crematorium operators under the Order since the market investigation also presents a moderately positive picture when compared with the above inflation increases in funeral directors' professional services fees

⁸¹ Funerals market investigation summary of final report, paragraph 18.

during the period leading up to the investigation. Additionally, we consider that there is a risk that the introduction of price control regulation in the absence of independent regulation of the quality of funeral services in England, Northern Ireland, and Wales may encourage funeral directors to seek to reduce their costs to maintain their profit margins, which could lead to a reduction in the quality of funeral services.⁸² Finally, implementing effective price control regulation for a heterogeneous product/service like a funerals package would be challenging, as funeral directors could circumvent the remedy by introducing and marketing more prominently a different funerals package to that subject to the price control regulation.

147. In response to the lack of visibility to customers of the level of quality of care given to the deceased by funeral directors, we do not think it would be appropriate to consult on a further market investigation, because important aspects of the quality of funeral services are not observable and the CMA would not be able to introduce remedies to improve the competitive process in this regard. This was recognised by the CMA in its market investigation, leading it to recommend to the UK government and devolved administrations in Northern Ireland and Wales to establish in England, Northern Ireland and Wales an inspection and registration regime to monitor the quality of funeral director services.
148. We remain of the view that independent, statutory regulation of funeral services is necessary in England, Northern Ireland and Wales, as is being implemented in Scotland. During the market investigation, the CMA received evidence from a broad range of organisations and individuals indicating that at least some funeral directors were perceived as providing unacceptable levels of quality in relation to their back-of-house facilities and processes. While the CMA was not in a position to establish how widespread those problems may have been, the importance of proper care of the deceased to the bereaved, the lack of transparency of back-of-house services provided by funeral directors, the widespread recognition across the sector that there were incidents of failure to meet appropriate standards, and the absence of a regulatory regime (contrary to the expectation of most consumers) outside of Scotland, meant that consumers could not be assured that the quality levels they would expect would always be met.⁸³ We have not seen evidence to

⁸² The CMA acknowledged the relationship between quality regulation and price control regulation in the funerals market investigation final report, paragraph 9.144a.

⁸³ The CMA did not prioritise analysis of quality issues in relation to the provision of back-of-house crematorium services given a lack of evidence or representations in relation to back-of-house quality. With regard to front of house, overall, the CMA considered that crematoria were likely to be delivering acceptable levels of front-of-house quality.

suggest such issues have become more widespread. However, the concerns raised by the Fuller Inquiry suggest it is still the case that issues with quality can arise with significant negative consequences for consumers.

149. As per the market investigation recommendation, regulation could initially take the form of the establishment of an inspection and registration regime to monitor the quality of funeral director services, as a first step in the establishment of a broader regulatory regime for funeral services in these nations. We stand ready to support the UK government and devolved administrations in Northern Ireland and Wales in developing the appropriate regulatory framework for funeral services in England, Northern Ireland and Wales.
150. If regulation of the quality of funeral services in England, Northern Ireland, and Wales is introduced, as well as improving and maintaining quality standards, this could also support the introduction of price control regulation. However, any assessment of the viability and appropriateness of price control regulation would need to be carried out once quality regulation had been put in place, taking into account the prevailing market conditions and the challenges of implementing price control regulation for a heterogeneous product. We will continue to monitor the revenue and volume information provided to the CMA by large funeral directors and all crematorium operators under the Order and provide this information to the UK government and devolved administrations in Northern Ireland and Wales.
151. Given the factors set out above, the CMA Board has decided not to consult on a further MIR. Moving forward, we will not publish any further annual reviews of market outcomes in the funerals sector, but we will continue to monitor the information we receive under the Order and provide this information to the UK government and devolved administrations in Northern Ireland and Wales to support our ongoing engagement with them on the regulation of the quality of funeral services in England, Northern Ireland and Wales. We will also take into account the lessons we have learned in the design, implementation, and monitoring and enforcement of the Order to future market investigations, including the CMA's ongoing market investigation into veterinary services for household pets.

Appendix A: Information provided by large funeral directors and all crematorium operators under the Order

1. The Order requires large funeral directors and all crematorium operators to provide the CMA with specific revenue and volume information on the goods and services they provide to customers, in order to help the CMA monitor the funerals sector.
2. Funeral directors operating five or more branches must supply the CMA every six months with the total number of funerals they have arranged for customers in the preceding six months, and the total revenue (excluding disbursements) gained from the provision of funeral director services⁸⁴ during the same period. The information must be provided separately for each branch and in aggregate form for all branches.
3. Funeral directors operating 10 or more branches must supply the CMA every six months with the same information outlined in paragraph 2 in aggregated form and also in disaggregated form, showing the totals for:
 - (a) CMA Attended Funerals;⁸⁵
 - (b) any other Attended Funerals⁸⁶ supplied by the funeral director;
 - (c) CMA Unattended Funerals;⁸⁷ and
 - (d) any other Unattended Funerals⁸⁸ supplied by the funeral director.
4. A crematorium operator must supply the CMA every six months with the total number of cremations it has carried out in the preceding six months and the total revenue it has gained from crematorium services⁸⁹ during the same

⁸⁴ Funeral director services are defined in the Order as the services provided by a funeral director to a customer in respect of the arrangements for a funeral. Such services can include, but are not limited to, collection, storage and care of the deceased; organisation of the funeral and supply of goods and services such as coffins, hearses and limousines; guidance and support to the bereaved; and intermediary services between the customer and third parties, such as the crematorium, cemetery or other burial site, and the minister or celebrant.

⁸⁵ A CMA Attended Funeral is defined in detail at Article 2 of the Order.

⁸⁶ An Attended Funeral is defined in the Order as a funeral which includes a service and where mourners may attend.

⁸⁷ A CMA Unattended Funeral is defined in detail at Article 2 of the Order.

⁸⁸ An Unattended Funeral is defined in the Order as a funeral which does not include a service and where mourners may not attend.

⁸⁹ Crematorium services are defined in the Order as the services provided by a crematorium operator in connection with the cremation of the deceased, including the provision of a chapel or specific place for attended cremations, the committal and the associated sales of additional products and services, such as memorials, audio-visual support and hospitality

period in aggregated form and also in disaggregated form, showing the totals for:

- (a) Crematorium Standard Fee Attended Services;⁹⁰
 - (b) Crematorium Reduced Fee Attended Services⁹¹ (if offered by the crematorium operator);
 - (c) Crematorium Unattended Services⁹² (if offered by the crematorium operator); and
 - (d) any other services provided by the crematorium operator that are not captured by paragraph 4(a), 4(b), and 4(c).
5. A crematorium operator must provide the information in paragraph 4 separately for each quarter for each crematorium it operates. Further, the revenue information must include all revenue generated from crematorium services and exclude burial services and the revenue generated from memorials related to crematorium services must be provided separately.
6. The revenue and volume information provided by funeral directors and crematorium operators as required under the Order is not directly comparable to the information that the CMA collected during the market investigation.⁹³ This is because the purpose of the information required under the Order is to provide the CMA with a high-level view of average revenue per funeral and per cremation and the types of services being purchased by consumers without placing an undue burden on funeral directors and crematorium operators. For this review, we have analysed information provided by funeral directors and crematorium operators to the CMA in April 2024 (to cover the period from 1 September 2023 to 28 February 2024) and October 2024 (to

⁹⁰ A Crematorium Standard Fee Attended Service is defined in the Order as a cremation which includes a service with mourners present at the crematorium held in peak hours (typically considered to be weekdays from 10am to 4pm and weekends).

⁹¹ A Crematorium Reduced Fee Attended Service is defined in the Order as a cremation which includes a service with mourners present at the crematorium held in off-peak hours (typically considered to be on a weekday before 10am or after 4pm) and for which a reduced fee is charged.

⁹² A Crematorium Unattended Service is defined in the Order as a cremation which does not include a service and where mourners are not present, sometimes referred to as a direct cremation.

⁹³ For funeral directors, (a) the two sets of information include different types of funeral services; (b) the information provided by funeral directors as required under the Order includes a greater proportion of smaller funeral directors than the information collected during the market investigation; and (c) the revenue information provided by funeral directors as required under the Order excludes disbursements (eg cremation and burial fees), whereas some of the information collected during the market investigation included disbursements. For crematorium operators, the analysis of cremation prices and mix conducted during the market investigation was based on crematorium fees rather than crematorium revenue, which includes additional products and services provided by the crematorium operator.

cover the period from 1 March 2024 to 31 August 2024). We have also compared this information against the information we have collected under the Order in previous years, in order to understand how the average revenue per funeral and cremation has changed since the market investigation. We note that the average revenue per funeral is not wholly equivalent to the average price per funeral, as it reflects the average amount paid by consumers in total, including optional add-ons and discounts, across different funerals rather than representing what is charged for a specific set of services.

7. Although the submissions we have received from funeral directors and crematorium operators have provided us with substantial coverage of the sector, we did not receive submissions from 8% of funeral directors and 15% of crematorium operators who are required to provide the specified information to the CMA.

Appendix B: Funeral directors' average revenue per funeral – detailed findings

Funeral directors operating five or more branches

Table 1: Average revenue per funeral for funeral directors operating five or more branches for the periods from 1 September 2023 to 28 February 2024 and 1 March 2024 to 31 August 2024

	1 Sept 2023 to 28 Feb 2024	% change (YoY)	1 March 2024 to 31 August 2024	% change (YoY)	Total	% change (YoY)
Total revenue (excluding disbursements)	£409,703,988	-3%	£407,016,898	-5%	£816,720,886	-4%
Total number of funerals arranged	148,526	-5%	145,420	-6%	293,946	-5%
Average revenue per funeral	£2,758	2%	£2,799	1%	£2,778	2%

Source: Information collected by the CMA from funeral directors operating five or more branches.

Notes:

1. The information in the table covering 1 September 2023 to 28 February 2024 is based on submissions from 74 funeral directors.
2. The information in the table covering 1 March 2024 to 31 August 2024 is based on submissions from 76 funeral directors.

Funeral directors operating 10 or more branches

Table 2: Average revenue per funeral for funeral directors operating 10 or more branches for the period from 1 September 2023 to 28 February 2024, split by funeral type

	CMA Attended Funerals	% change (YoY)	Other Attended Funerals	% change (YoY)	CMA Unattended Funerals	% change (YoY)	Other Unattended Funerals	% change (YoY)	Total	% change (YoY)
Total revenue (excluding disbursements)	£92,567,456	-8%	£249,274,795	1%	£11,367,579	22%	£5,472,296	15%	£358,682,126	-1%
Total no. of funerals arranged	34,683	-16%	80,619	-1%	11,086	11%	4,909	-1%	131,297	-5%
Average revenue per funeral	£2,669	10%	£3,092	2%	£1,025	13%	£1,115	16%	£2,732	4%

Source: Information collected by the CMA from funeral directors operating 10 or more branches.

Note: The information in the table is based on submissions from 28 funeral directors.

Table 3: Average revenue per funeral for funeral directors operating 10 or more branches for the period from 1 March 2024 to 31 August 2024, split by funeral type

	<i>CMA Attended Funerals</i>	<i>% change (YoY)</i>	<i>Other Attended Funerals</i>	<i>% change (YoY)</i>	<i>CMA Unattended Funerals</i>	<i>% change (YoY)</i>	<i>Other Unattended Funerals</i>	<i>% change (YoY)</i>	<i>Total</i>	<i>% change (YoY)</i>
Total revenue (excluding disbursements)	£92,165,569	-5%	£242,709,713	-2%	£14,863,988	18%	£4,539,852	29%	£354,279,122	-2%
Total no. of funerals arranged	34,350	-11%	76,590	-5%	13,868	8%	3,591	17%	128,399	-5%
Average revenue per funeral	£2,683	6%	£3,169	3%	£1,072	11%	£1,264	11%	£2,759	3%

Source: Information collected by the CMA from funeral directors operating 10 or more branches.

Note: The information in the table is based on submissions from 27 funeral directors.

Appendix C: Crematorium operators' average revenue per cremation – detailed findings

Table 1: Average revenue per cremation for the period from 1 September 2023 to 30 November 2023, split by cremation type

	Standard Fee Attended Services	% change (YoY)	Reduced Fee Attended Services	% change (YoY)	Unattended Services	% change (YoY)	Total	% change (YoY)
Total revenue	£69,450,873	-12%	£1,977,371	0%	£8,300,913	46%	£79,729,156	-8%
Total revenue from memorials							£7,784,877	-9%
Total number of cremations carried out	74,591	-15%	3,370	12%	16,442	2%	94,403	-13%
Average revenue per cremation	£931	4%	£587	-12%	£505	43%	£845	5%

Source: Information collected by the CMA from crematorium operators.

Note: The information in the table is based on submissions from 158 crematorium operators.

Table 2: Average revenue per cremation for the period from 1 December 2023 to 28 February 2024, split by cremation type

	Standard Fee Attended Services	% change (YoY)	Reduced Fee Attended Services	% change (YoY)	Unattended Services	% change (YoY)	Total	% change (YoY)
Total revenue	£76,982, 796	-14%	£2,501,306	-2%	£9,167,165	31%	£88,651,267	-11%
Total revenue from memorials							£6,314,800	-14%
Total number of cremations carried out	81,855	-17%	4,304	12%	18,184	-5%	104,343	-17%
Average revenue per cremation	£940	3%	£581	-14%	£504	38%	£850	4%

Source: Information collected by the CMA from crematorium operators.

Note: The information in the table is based on submissions from 158 crematorium operators.

Table 3: Average revenue per cremation for the period from 1 March 2024 to 31 May 2024, split by cremation type

	Standard Fee Attended Services	% change (YoY)	Reduced Fee Attended Services	% change (YoY)	Unattended services	% change (YoY)	Total	% change (YoY)
Total revenue	£71,454,521	-17%	£2,614,771	0%	£9,542,407	39%	£83,611,698	-12%
Total revenue from memorials							£7,901,267	-13%
Total number of cremations carried out	72,770	-21%	3,900	11%	18,235	-4%	94,905	-21%
Average revenue per cremation	£982	5%	£670	-12%	£523	44%	£881	6%

Source: Information collected by the CMA from crematorium operators.

Note: The information in the table is based on submissions from 149 crematorium operators.

Table 4: Average revenue per cremation for the period from 1 June 2024 to 31 August 2024, split by cremation type

	<i>Standard Fee Attended Services</i>	<i>% change (YoY)</i>	<i>Reduced Fee Attended Services</i>	<i>% change (YoY)</i>	<i>Unattended services</i>	<i>% change (YoY)</i>	<i>Total</i>	<i>% change (YoY)</i>
Total revenue	£66,776,264	-14%	£2,404,976	19%	£9,496,079	43%	£78,677,319	-9%
Total revenue from memorials							£8,160,488	-15%
Total number of cremations carried out	68,247	-17%	3,561	17%	18,369	0%	90,177	-15%
Average revenue per cremation	£978	4%	£675	2%	£517	44%	£872	5%

Source: Information collected by the CMA from crematorium operators.

Note: The information in the table is based on submissions from 149 crematorium operators.