

Association of Private Pet Cemeteries & Crematoria (APPCC)

Submission to the Competition and Markets Authority (CMA)

Re: Provisional Decision Report – Veterinary Services for Household Pets (15 October 2025)

1. Introduction

The Association of Private Pet Cemeteries & Crematoria (APPCC) welcomes the CMA's investigation into the veterinary market and its recognition of the need for transparency around pet cremation services.

However, the provisional report's proposed remedies focus almost exclusively on price publication and choice, while failing to address the service descriptions, standards, and integrity of what is actually being sold to consumers.

This narrow focus risks entrenching, not correcting, the problem of misleading sales practices, leaving bereaved pet owners vulnerable to misinformation. The CMA's current approach does not satisfy the requirements of the Consumer Protection from Unfair Trading Regulations 2008, which requires sufficient information for consumers to make an informed transactional decision.

2. The Problem with “Sensitivity” and Hidden Processes

The CMA's repeated references to “sensitivity” in the handling of pet cremations appear well-intentioned but misplaced. In a properly conducted pet cremation, there is nothing to hide. Sensitivity becomes necessary only when the underlying process is distressing or misrepresented.

Where cremations are conducted respectfully and transparently, plain language is sufficient. The APPCC Code of Practice provides clear, straightforward standards that any reasonable pet owner would consider acceptable. These are included at the end of this submission.

3. Price Without Context is Misleading

The CMA's report treats all “communal” and “individual” cremations as if they were comparable services differing only by price. This is fundamentally inaccurate.

Without clear, enforceable definitions and descriptions, these labels are meaningless to consumers. A so-called “communal cremation” may in practice involve pets piled into chest freezers for up to a week, bodies transported in bulk alongside veterinary waste, loading into large incinerators en masse, and “token scattering” of sample ashes under misleading “remembrance garden” claims.

This is not a cremation service — it is a simple disposal by incineration and should be honestly described as such.

Trading Standards law requires that services be accurately described, not sold under names that

obscure their true nature. The CMA's failure to address this distinction perpetuates consumer deception.

4. The CMA's Misguided Remedy on "Offering Communal Cremations"

Every veterinary practice in the UK already offers communal cremations. This "remedy" therefore adds nothing new.

The problem is not whether communal cremations are available but whether their nature and delivery are truthfully described. Price transparency alone cannot fix an information deficit this severe.

If the CMA genuinely wants to improve consumer understanding, it must require that service transparency accompanies price transparency.

5. Mandatory Written Service Descriptions

The APPCC supports a two-working-day cooling-off period but emphasises this is only meaningful if the pet owner is given a written service description and price breakdown beforehand, including:

- the name and APHA approval number of the cremation provider;
- how and where their pet will be transported and stored;
- an accurate description of the procedures for individual cremation, communal cremation and disposal;
- confirmation that pet owners are free to appoint their own crematorium.

This information must be provided before consent is obtained. Without it, a "cooling-off period" simply delays the point of confusion.

6. Fair and Transparent Economics

The CMA's own findings show high mark-ups for individual cremations and limited profit on communal ones. This imbalance risks encouraging vets to upsell individual cremations — a pattern already seen in the sector.

Some cremation providers have offered packages to vets where communal cremations are "free" if a target number of individual cremations is met. This practice distorts the market and exploits grief.

The APPCC recommends a fairer model: veterinary practices should charge the crematorium's price as a disbursement and apply a separate, disclosed handling or administration fee for their own costs. This would ensure genuine price transparency and remove the incentive for hidden mark-ups.

7. Glossary Definitions: Preventing Fraud by Ambiguity

The CMA's glossary defines:

"Individual cremation – cremation of a single animal, with ashes returned to the owner. Communal cremation – cremation of more than one animal, with ashes not returned."

These definitions are inadequate and invite abuse. They must be replaced by the APPCC Code of Practice definitions:

- Individual cremation: the cremation of individual pets alone with respect, dignity and care within an enclosed chamber. All ashes will be scrupulously collected, ensuring that all visible remains are removed, before any other cremations take place. The integrity of these remains will be preserved at all times.
- Communal cremation: the cremation of two or more pets together side by side with respect, dignity and care, with no ashes separated or returned.
- Disposal service: the collection of animal bodies for mass incineration or waste processing, where no ashes are returned.

Without these definitions, unscrupulous providers may continue to place multiple pets in the same chamber or make token raking-out of remains while charging for “individual cremation” — a practice that is fraudulent under consumer law.

8. Access for APHA Approved Pet Crematoria

The CMA must ensure that veterinary practices allow APHA approved crematoria and pet funeral companies to collect pets when chosen by the owner.

The APPCC has provided evidence that some vet practices refuse access to independent crematoria, coercing owners to use the practice’s contracted provider or forcing them to transport their deceased pets themselves.

Such refusals constitute restriction of consumer choice and breach both competition principles and the Consumer Protection Regulations.

9. Redactions and Transparency

Large sections of the CMA’s report, particularly financial data on cremation services, are redacted. This contradicts the CMA’s stated goal of “improving transparency.”

It is inconsistent for the CMA to demand openness from businesses while concealing key data that would help the public understand how cremation services are priced and delivered.

10. The End of “One-Stop Shop” Cremation and Waste Models

Respectful individual and communal cremations cannot be delivered on a mass scale within the same facility without compromising standards. The CMA should recognise that the “one-stop shop” model serving hundreds of vet practices with pets often alongside veterinary waste is incompatible with the standards modern pet owners expect.

Encouraging genuine competition between independent crematoria — not conglomerate wholesalers — will raise service standards and preserve consumer choice.

11. APPCC Recommendations

1. Adopt APPCC Code of Practice definitions for individual, communal, and disposal cremations.
2. Mandate written service descriptions published alongside prices.
3. Require access rights for APHA approved cremation providers chosen by owners.
4. Acknowledge that all vets already offer communal cremations, redirecting focus toward service transparency and consumer protection.
5. Prohibit conditional wholesale packages that incentivise the sale of individual cremations.
6. Adopt the “disbursement plus handling fee” model for vet charges.
7. Ensure enforcement: breaches of these duties should be treated as misleading commercial practices under the Consumer Protection from Unfair Trading Regulations 2008.
8. Remove excessive redactions in the CMA’s final report to model the transparency it demands.

12. Conclusion

Price lists without service descriptions are meaningless. Consumers cannot compare what they cannot see.

The CMA’s focus on “price transparency” must evolve into service transparency — requiring plain, accurate language about what each cremation involves, who provides it, and how the pet is treated.

The APPCC stands ready to assist the CMA in developing enforceable definitions and transparency standards that protect both consumers and the integrity of the pet after-death care sector.

Appendix: Extracts from the APPCC Code of Practice

2.2 We will collect and store pets for individual burial, individual cremation, or communal cremation, with respect, dignity and care. We will not place bodies on top of each other without a solid divider between them.

4.2 We will cremate individual pets alone with respect, dignity and care within an enclosed chamber. All ashes will be collected before any other cremations take place.

5.1 We will cremate two or more pets together side by side with respect, dignity and care.

7.1(a) Cremation: a cremation service that is respectful, dignified and caring at all stages — collection, transportation, storage, cremation, cremulation, and onward processing.