

# VETERINARY SERVICES FOR HOUSEHOLD PETS

## Appendix K: Cremations pricing, mark- ups and costs

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The Competition and Markets Authority has excluded from this published version of the final report information which the inquiry group considers should be excluded having regard to the three considerations set out in section 244 of the Enterprise Act 2002 (specified information: considerations relevant to disclosure). The omissions are indicated by [✂]. Some numbers have been replaced by a range. These are shown in square brackets. Non-sensitive wording is also indicated in square brackets.

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# 1. Introduction

1.1 This appendix sets out the results of our analysis of:

- (a) the pricing of cremation services provided by LVGs, as well as a sample of independent FOPs and independent crematoria
- (b) the mark-ups charged by LVGs on cremations, compared to the wholesale fees they pay to their preferred crematoria provider, and
- (c) the costs incurred by LVGs in the provision of cremation services.

## 2. Pricing of individual and communal cremations services

### LVGs

- 2.1 Based on information submitted by each of the LVGs, we estimated median retail prices at each of the LVGs' FOPs for individual and communal cremations, based on different animal types and weights. We found communal cremations are considerably cheaper than individual cremations for any given pet weight category, with communal services being two to five times cheaper than their individual equivalent. We attempted to compare retail prices between providers in detail but found it difficult to make very clear comparisons given data availability issues. We have therefore not given these cross-LVG results significant weight in our conclusions in Part A, section 13.<sup>1</sup>
- 2.2 All LVGs submitted data on the cremation services they provided in the 12 months to September 2024.<sup>2</sup> This included information on:
- (a) the veterinary practice administering the cremation
  - (b) the type of pet cremated and, for dogs only, the relevant weight category
  - (c) the type of cremation service provided (individual, communal, other),<sup>3</sup> and
  - (d) the retail service price (the latest list price charged and/or the average list price over the last 12 months).
- 2.3 Combining all LVGs' responses resulted in a merged dataset of 28,565 entries. After removing some datapoints that appeared to be misclassified, we were left with 11,934 individual cremation observations and 9,636 communal cremation observations.
- 2.4 There are a number of caveats to this data, which are likely to create a systematic bias, such that we are unable to place significant weight on cross-LVG retail price comparisons, particularly for individual cremations.
- (a) The retail price entries had significant ranges and were not weighted by sales volumes. This could create a systematic bias where, for example, one LVG had a large number of entries with cheaper prices that only represent a small proportion of sales volumes, compared to another LVG that had a small number of entries with cheaper prices that represent a large proportion of

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<sup>1</sup> Part A, section 13: Cremations.

<sup>2</sup> CVS' RFI response, [REDACTED], Q8; IVC's RFI response, [REDACTED], Q8; Linnaeus' RFI response, [REDACTED], Q8; Medivet's RFI response, [REDACTED], Q8; PAH's RFI response, [REDACTED], Q8; and VetPartners' RFI response, [REDACTED], Q8.

<sup>3</sup> Only [REDACTED] and [REDACTED] have classified 'other' services; the other LVGs were either able to isolate these services and excluded them from the data or mixed them into either the individual or communal cremation list. Examples of other services are cremation keepsakes, casket/urns, cremation certificates, animal collection fees, etc. For [REDACTED], information on the veterinary practices administering the cremation was only available for sites in Northern Ireland.

sales volumes. While we have no reason to expect that this is the case, it is possible where entries are not weighted by sales volumes.

- (b) Although we asked LVGs to submit prices only for the standalone cremation service fee, IVC did not provide this separately from the cost of the casket. This is likely to create a systematic bias particularly for individual cremations, where ashes are returned to the owner in a container of their choice for an additional fee.
- (c) [REDACTED] dataset had a number of issues that limit our ability to compare it with other LVGs. Out of 5,260 entries for individual cremations, there were 3,478 that appeared to only consist of ‘add-on’ services and 852 that clearly referred to the joint provision of euthanasia and cremation services. We removed these entries, but it is unclear whether there were other entries of this sort that were unable to identify.

2.5 Notwithstanding these points, prices of individual and communal cremation services provided by LVGs in the 12 months up to September 2024 are summarised in Table 2.1 below.<sup>4</sup>

**Table 2.1: Median price of individual and communal services provided by LVGs in the 12 months up to September 2024, by animal type**

LVG	Preferred crematoria provider and owner	Individual cremations				Communal cremations			
		All pets	Dogs	Cats	Small pets	All pets	Dogs	Cats	Small pets
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Source: CMA analysis of LVG responses to RF17, Q8 [REDACTED].

2.6 Given the caveats above, we have not given significant weight to [REDACTED] retail prices, or [REDACTED] retail prices in comparison to other LVGs. Having said that, LVGs using the same crematoria appeared to provide the most similar pricing: [REDACTED] and [REDACTED], which both use [REDACTED] crematoria, consistently appeared to sell individual cremations at the most expensive prices, whereas [REDACTED] and [REDACTED], which use [REDACTED] crematoria, appeared to be relatively cheaper. [REDACTED] appears to be the third most expensive provider of individual cremations and the most expensive provider of communal cremations.

<sup>4</sup> Further results of our pricing analysis, including our analysis of independent FOPs and independent crematoria, are presented further below in this appendix.

2.7 Some LVGs submitted that they set their retail prices based on the list price that is available by going direct to the crematoria.<sup>5</sup> In this case, the scope for pet owners to save money on cremations therefore depends on whether retail providers offer discounts off these list prices.

## Independent FOPs and crematoria

2.8 We do not have access to high-quality pricing data from a significant sample of independent FOPs. However, for indicative purposes we analysed some data collected by [redacted], which includes records of cremation services. After cleaning these records and removing euthanasia/cremation bundled services, we obtained a dataset of 3,022 observations provided by 51 independent FOPs in the calendar year to September 2024 (which aligned with the timing of the LVG data we reviewed). Of these, 898 records explicitly referred to individual cremations provided by 27 FOPs, and 193 referred to communal cremations provided by 10 FOPs. The median retail price of individual cremations charged by the independent FOPs in this sample was around £150<sup>6</sup> for both dogs and cats.

2.9 We also conducted a desktop review of publicly available prices at independent crematoria (which generally supply direct to pet owners or partner with independent FOPs). We checked websites of 30 independent crematoria (there are 96 independent crematoria sites, with some businesses having multiple sites) and found public price lists on 21 of these websites.

2.10 Of these publicly available price lists, the average retail prices charged by independent crematoria for individual cremation services ranged from £160 for a cat to £275 for a very large dog.

2.11 Median retail prices of individual cremations provided by independent FOPs and independent crematoria are summarised in Table 2.2 below.

**Table 2.2: Retail prices (£) of individual cremation services (independents)**

Provider	All dogs	Small dogs	Medium dogs	Large dogs	XL dogs	Cats
LVGs (average) *	249.47	214.37	234.23	272.11	313.30	186.87
Independent FOPs ^	153.36	N/A	N/A	N/A	N/A	127.80
Independent crematoria †	N/A	182.50	208.50	240.00	275.00	160.00

Source: CMA analysis and LVG responses to RF17, Q8.

\* Average of the median retail prices of LVGs' individual cremations.

^ From [redacted] data.

† From our desktop research.

2.12 Of all 30 websites we checked, only seven offered communal cremations. We consider that this indicates that pet owners looking to use independent crematoria

<sup>5</sup> LVG response to RFI, Q9 [redacted], [PAH IS Response](#), paragraph 20; [redacted]; Pets At Home response to RFI, Q40, paragraph 40.3.

<sup>6</sup> Since PDR, we have updated this estimate to add VAT, which was excluded from the figures provided to us by [redacted].

may find it hard to obtain cheaper communal cremations. Of the 21 websites with pricing information, only five had communal price data. Given this lack of data, we have not calculated average communal prices at independent crematoria.

### 3. LVG mark-ups on wholesale cremation prices

- 3.1 [X] also submitted information on the prices charged to their FOPs and referral centres in the UK for the supply of cremation services by crematoria ('wholesale prices'),<sup>7</sup> either within the vertically integrated group ([X] and [X]) or as third-party provider.
- 3.2 Again, there are caveats to this data, which meant we were unable to calculate mark-ups for [X] and [X] and give rise to some degree of uncertainty regarding our analysis on other providers. In particular:
- (a) [X] could submit wholesale price data only for its FOPs in Northern Ireland (in the rest of UK, up until April 2025 it used in-house crematoria which did not charge in a way that allowed it to estimate the cost of the wholesale cremation 'input').<sup>8</sup>
  - (b) [X] submitted that it does not centrally hold information on the wholesale price paid by FOPs to third parties for cremations on a service-by-service basis because this information is not consistently recorded by [X] FOPs. For cremations provided in-house by [X], it submitted a generic price list of services, which we were unable to reconcile with the specific FOP-level information in the dataset.<sup>9</sup>
  - (c) As above, retail and wholesale price entries had significant ranges and were not weighted by sales volumes. This could create a systematic bias where, for example, one LVG had a large number of entries with cheaper prices that only represent a small proportion of sales volumes, compared to another LVG that had a small number of entries with cheaper prices that represent a large proportion of sales volumes. While we have no reason to expect that this is the case, it is possible where entries are not weighted by sales volumes.
  - (d) [X] could provide price information by dog weight only for individual cremations. We therefore could not estimate [X] mark-ups for communal cremations by dog weight.<sup>10</sup>
  - (e) The submissions of [X], [X] and [X] did not have standardised dog weight classes across all FOPs and contained some weight categories that combined dog sizes.<sup>11</sup> For example, [X] data contained the weight category

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<sup>7</sup> [X] response to RFI, Q8; [X] response to RFI, Q8; [X] response to RFI, Q8; [X] response to RFI, Q8; [X] response to RFI, Q8.

<sup>8</sup> [X] response to RFI Q8. We did not conduct analysis on [X] FOPs in Northern Ireland, given the limited scope of data points available for this region.

<sup>9</sup> [X] response to RFI Q8.

<sup>10</sup> [X] response to RFI, Q8, Appendix 4.

<sup>11</sup> [X] response to RFI, Q8, Appendix 4; [X] response to RFI, Q8, Appendix 4; [X] response to RFI, Q8, Appendix 4.

'up to 25 kg' which covers small and medium sized dogs.<sup>12</sup> We have classed cremation services for dogs up to 25kg as medium sized dogs. Given this classification, we could not estimate [redacted] mark-ups for communal cremations of small dogs.

- 3.3 For those LVGs that provided the relevant wholesale information, we estimated, for all animal categories and cremation service types:
- (a) absolute median mark-ups, being the median of all differences between retail and wholesale prices computed on each relevant observation, and
  - (b) median percentage mark-ups, by taking the median of all of the percentage mark-ups computed on each relevant observation in the dataset.
- 3.4 Figures 3.1 and 3.2<sup>13</sup> below show our estimates of each LVG's median mark-ups for (a) individual cremation services and (b) communal cremation services, split by type of animal. Although mark-ups vary across animal types, patterns are generally consistent, with [redacted] and [redacted] earning the highest (absolute) mark-ups for both individual and communal cremations, followed by [redacted] and [redacted].
- 3.5 We conducted a similar analysis across different dog weights, for both individual and communal cremations (although, as noted above, we could not assess [redacted] mark-ups for communal cremations of small dogs, or [redacted] mark-ups for communal cremations by different dog weights). In general, the patterns described above were consistent across dog weights, with [redacted] and [redacted] earning the highest (absolute) mark-ups for individual cremations, followed by [redacted] and [redacted].

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<sup>12</sup> [redacted].

<sup>13</sup> In Figures 3.1 to 3.2, the median retail prices (shown in dark blue boxes above the bars in the chart) may not correspond exactly to the sum of median wholesale cost and median mark-up. This is because, in general, the median of differences between two series of data is not equal to the difference of the respective median values. In other words, computing the absolute median mark-up as a median of differences (between retail and wholesale prices for each relevant observation) may yield different results than taking the simple difference between the median retail and the median wholesale prices. The same reasoning applies to the percentage mark-ups, as the median of ratios between two series of data will generally diverge from the ratio of their median values.

**Figure 3.1: Mark-ups on wholesale prices of individual cremation services, by LVG and animal class**



*Source: CMA analysis and LVG responses to RFI, Q8.*

**Figure 3.2: Mark-ups on wholesale prices of communal cremation services, by LVG and animal class**



*Source: CMA analysis and LVG responses to RFI, Q8.*

## 4. Costs incurred by LVGs in the provision of cremation services

- 4.1 We asked LVGs to provide estimates of the staff time and non-staff costs attributable to the provision of individual and communal cremations, as well as any supporting evidence underpinning such estimates.
- 4.2 [REDACTED], [REDACTED], [REDACTED], [REDACTED] and [REDACTED] provided itemised cost estimates for staff time, although [REDACTED] did not use any comprehensive dataset to underpin their estimates.<sup>14</sup> [REDACTED] LVGs stated that FOPs incur common and shared costs, and that they do not assess profitability of specific treatments.<sup>15</sup>
- 4.3 Most LVGs submitted that the staff costs incurred by a FOP to support the provision of a cremation varies significantly on a case-by-case basis.<sup>16</sup> For example, Linnaeus submitted that the amount of time required can vary considerably depending on the emotional state of the pet owner,<sup>17</sup> and Pets at Home submitted that, among other factors, the type of employee (vet, nurse, receptionist or practice manager) that handles each stage of the process affects the financial cost incurred by FOPs.<sup>18</sup>
- 4.4 LVGs estimated staff costs by asking individual FOPs or staff with experience of providing cremations. Specifically:
- (a) [REDACTED] estimated costs by asking nine staff with experience working in local clinics to assign a best estimate of a time range to the activities that are typically undertaken related to a pet's cremation. [REDACTED] asked these staff to provide time estimates based on a range of different scenarios that could apply. It then multiplied these staff costs by a per-minute employment cost estimate to obtain an approximate range of staff costs.<sup>19</sup>
  - (b) [REDACTED] estimated costs on a 'best-efforts' basis by estimating the amount of time associated with each step taken to support the provision of a cremation. It then multiplied these with its current average hourly rates to obtain an estimate of staff costs.<sup>20</sup>
  - (c) [REDACTED] provided estimates on a 'best endeavours' basis of the average and typical range of time taken to support the provision of a cremation. It then multiplied these by employment rates to obtain a bottom-up estimate of staff costs. It also attempted to provide a top-down estimate of the indirect costs

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<sup>14</sup> [REDACTED].

<sup>15</sup> LVG responses to RF117, Q40. [REDACTED].

<sup>16</sup> LVG responses to RF117, Q40. [REDACTED].

<sup>17</sup> Linnaeus response to RF117, Q40, paragraph 40.1

<sup>18</sup> Pets at Home response to RF117, Q40, paragraph 40.1.

<sup>19</sup> [REDACTED].

<sup>20</sup> [REDACTED].

associated with cremations by assuming that its cremations cost share (on a global basis) is equal or similar to its global cremation revenue share ([redacted] %).<sup>21</sup> We have not given weight to this top-down estimate as we have not seen any evidence indicating that cremations revenue share is likely to be representative of cremations cost share

- (d) [redacted] estimated the staff time and costs its FOPs spend on four steps normally included in the cremation process (discussion of options, paperwork, bag for pet body storage and communicating with pet owner). It focused on the approximate average costs that a FOP would incur and did not provide a more general range of typical staff costs.<sup>22</sup>
- (e) [redacted] sent a questionnaire to 30 of its FOPs, asking them to estimate the average time their employees spend in their relevant roles to support the provision of a cremation. It then multiplied these estimates by an estimate of its hourly cost rates to obtain an estimate of staff costs.<sup>23</sup>

4.5 The results of these estimates are summarised in Table 4.1 below.

**Table 4.1: LVG estimates of staff costs incurred in the provision of a cremation**

	Individual cremation				Communal cremation			
	Average staff time (minutes)*	Average staff costs	Range in staff time (minutes)*	Range in staff costs	Average staff time (minutes)*	Average staff costs	Range in staff time (minutes)*	Range in staff costs
[redacted]	-	-	[0-30] to [210-240]	[£0-20] to [£120-140]	-	-	[0-30] to [150-180]	[£0-20] to [£100-120]
[redacted]	[150-180]	[£60-80]	[60-90] to [240-270]	[£0-20] to [£100-120]	[90-120]	[£40-60]	[30-60] to [180-210]	[£0-20] to [£100-120]
[redacted]	[60-90]	[£20-40]	[60-90] to [180-210]	[£0-20] to [£60-80]	[30-60]	[£0-20]	[30-60] to [90-120]	[£0-20] to [£20-40]
[redacted]	[60-90] to [60-90]	[£20-40] to [£20-40]	-	-	[30-60]	[£20-40]	-	-
[redacted]	[180-210]	[£60-80]	[120-150] to [210-240]	-	[120-150]	[£40-60]	[90-120] to [150-180]	-

Source: LVG responses to RFI, Q40.

\* For [redacted] and [redacted], staff time estimates are provided as 'vet equivalent time', where non-vet time is adjusted down to reflect that non-vets earn a lower average salary. For [redacted], [redacted] and [redacted], staff time estimates are provided as 'all staff time', which are not adjusted for salary.

4.6 Only [redacted] and [redacted] attempted to estimate non-staff costs. Other LVGs were unable to estimate these but noted that they incur non-staff costs including storage, handling and general overheads.

- (a) [redacted] estimated that it incurred average non-staff costs of around £[redacted] per individual cremation and around £[redacted] per communal cremation. It calculated these by estimating, among other things, storage-related costs, premises costs, utilities/facilities costs and administrative costs at 25 FOPs. It then

<sup>21</sup> [redacted].

<sup>22</sup> [redacted].

<sup>23</sup> [redacted].

estimated an overall 'overhead cost per hour' by distributing total overhead costs uniformly across employee working hours at the 25 FOPs. It then estimated cremations overhead costs based on the general staff time estimates above.<sup>24</sup> We consider this approach to be reasonable, although note that it is unclear how the total overheads estimate was derived.

- (b) [redacted] estimated non-staff costs based on a 'top-down' method, in which it assumed that its cremations cost share (on a global basis) is equal or similar to its global cremation revenue share ([redacted]%).<sup>25</sup> As above, we have not given weight to this estimate as we have not seen any evidence indicating that cremation revenue share is likely to be representative of its cost share.

4.7 Figures 4.1 and 4.2 below summarise the key cost estimates provided by LVGs. Each estimate includes (a) the relevant LVG's estimate of staff costs, and (b) [redacted] estimate of non-staff costs ([redacted] per individual cremation and [redacted] per communal cremation). They do not include wholesale purchasing costs. We have excluded [redacted] because it did not provide any average cost estimates (it only provided minimum and maximum cost estimates).

**Figure 4.1: LVG estimates of costs incurred in the provision of one individual cremation**

[redacted]

Source: CMA analysis and LVG responses to RFI17, Question 40.

**Figure 4.2: LVG estimates of costs incurred in the provision of one communal cremation**

[redacted]

Source: CMA analysis and LVG responses to RFI17, Question 40.

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<sup>24</sup> [redacted] response to RFI, [redacted], Q40.

<sup>25</sup> [redacted] response to RFI, [redacted], Q40.