



Review of the funeral industry  
in NSW: Funeral Prices

# Information Paper

June 2021

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Submissions to our Issues Paper raised concerns about high prices and lack of affordable funeral options for consumers.<sup>1</sup> To examine this issue, we analysed funeral prices in NSW and found that there is a range of options when purchasing a funeral, and so prices can vary substantially. We concluded that lower-priced funeral options are available, but more should be done to ensure consumers can make quick and easy comparisons between offerings, so they can make informed decisions when they purchase a funeral. This view is based on our findings that:

**A wide choice of funeral options and price points are available in most areas of NSW.** Most providers offer a range of funeral types, from minimal through to premium packages, with prices that vary accordingly. Prices for similar funeral types also vary across funeral providers. However, there is little evidence to suggest that prices substantially exceed costs.

**The funeral information standard has made it easier for consumers to compare options and prices** to find a funeral that suits their needs and budget. This standard requires funeral providers in NSW to prominently display an itemised pricelist and other funeral information on their website and at their place of business.

**Greater compliance and improvements to the funeral information standard are necessary to further help consumers.** When we published our Draft Report for this review, we found that around a third of the 250 funeral providers we looked at were not publishing any of the required funeral information. Following the release of our Draft Report, the Minister for Better Regulation announced a compliance blitz on funeral providers.<sup>2</sup> When we looked at around 260 funeral providers throughout May and June 2021, we found that compliance had improved. The number of funeral providers not publishing any of the required funeral information reduced from around a third to around a quarter, a pleasing improvement since the release of our Draft Report.

We commend the improvement in compliance, but we also continue to recommend actions to:

- clarify aspects of the funeral information standard to make it easier for funeral providers to comply
- improve aspects of the funeral information standard to make it easier for consumers to compare the information published by funeral providers.

**New funeral providers entering the industry** in recent years are putting downward pressure on lower-priced funeral products. Consumers are likely to benefit from a wider range of choice and lower prices (if they are price-sensitive).

Our conclusions about funeral prices and recommendations to improve compliance with the funeral information standard are largely unchanged from our Draft Report. However, we have broadened some of our recommended improvements to the funeral information standard to address some points raised in submissions to our Draft Report.

Some stakeholders submitted that our review focused too much on price and not enough on differences in quality between providers.<sup>3</sup> In our view, our recommendations promote choice and access to information for consumers. This approach recognises that people have different preferences when arranging a funeral and that price is one of many factors that they should consider.

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## A wide range of prices reflects choice for consumers

We found that there is adequate choice for consumers in most areas of NSW when they arrange a funeral, and that these choices are reflected in a wide range of prices. Our investigation showed that there are around 260 funeral providers in NSW,<sup>a</sup> almost all with websites. We downloaded funeral price information from those who displayed it and found that:

- most funeral providers provide a range of funeral types and price points
- prices for similar funeral types vary widely across funeral providers
- professional services fee and coffin are usually the highest price components
- comparison of funeral prices and costs shows that their prices are likely to reflect underlying costs.

## Most funeral providers offer a range of funeral types and price points

We identified a range of funeral types offered by most funeral providers in NSW, including:

**No service no attendance (NSNA) funeral** where the funeral provider completes the minimum requirements for a direct cremation or direct burial, which does not include a funeral ceremony at the time of the cremation or burial.<sup>4</sup> Our analysis considers NSNA cremations and NSNA burials as a type of funeral product.

**Standard funeral with a ceremony** where a single funeral ceremony is usually held in a chapel, church or other external venue and is followed by a non-attended cremation or burial. It usually includes lower priced components, such as a lower-priced coffin.

**Premium funeral packages** which may include one or more viewings of the deceased, multiple ceremonies, transport for the family to the funeral, and higher-priced flowers, order of service book and other tributes.

Table 1 shows an example of the broad range of options that consumers can choose from. For example, Value Cremations offers a NSNA cremation package for \$1,790, while Boland Funerals offers a Platinum Care Cremation package for \$14,495. Both are funeral brands owned by InvoCare – the largest funeral provider in NSW. There are a range of options in between these two products, with different price points. The items included in these packages vary substantially, and so by comparing the range of options available, consumers can ensure they purchase a funeral that meets their needs, at a price they can afford.<sup>b</sup>

Secondly, even within a single product category (such as NSNA cremation) there is wide price variation among different funeral providers – this is discussed further below.

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<sup>a</sup> 260 funeral providers refers to the number of unique funeral businesses operating in NSW. For example, we counted White Lady as one funeral business, even though it operates in many locations.

<sup>b</sup> Some assistance is available to people who are not able to pay for a funeral. For more information, please see our Issues Paper for this review.

Table 1 Funeral package comparison

Package name	Value Cremations – NSNA cremation package	Boland Funerals (a Guardian funeral provider) – Platinum care cremation package
Included services	<ul style="list-style-type: none"> <li>Professional fee</li> <li>Transport and mortuary care</li> <li>Shroud</li> <li>Basic coffin</li> <li>Cremation certificate</li> <li>Death Certificate</li> <li>Cremation permit</li> <li>Cremation</li> </ul>	<ul style="list-style-type: none"> <li>Orion coffin</li> <li>Triple booking funeral service</li> <li>Transport and platinum mortuary care</li> <li>Viewing during business hours</li> <li>Celebrant or Clergy to the value of \$500</li> <li>Flowers to the value of \$1000</li> <li>Seven-seater limousine mourning car</li> <li>Newspaper notice, premium condolence book, order of service book, A1 portrait of loved one</li> <li>All legal documents</li> </ul>
<b>Price</b>	<b>\$1,790</b>	<b>\$14,495</b>

Note: Our pricing analysis has focused on prices for cremation packages. This is because they are the most widely published prices. Source: Value Cremations, Cremation Pricing (NSW), accessed 31 March 2021; Boland Funerals, a Guardian funeral provider, Platinum Care, accessed 31 March 2021.

## Prices for similar funeral types vary widely across funeral providers

We looked at a sample of around 40 funeral providers' websites,<sup>c</sup> and found that the median price for a NSNA cremation package is around \$3,800. However, there are many funeral providers who advertise prices that are well above or well below this, with prices varying from around \$1,800 to around \$6,600 (Figure 1).

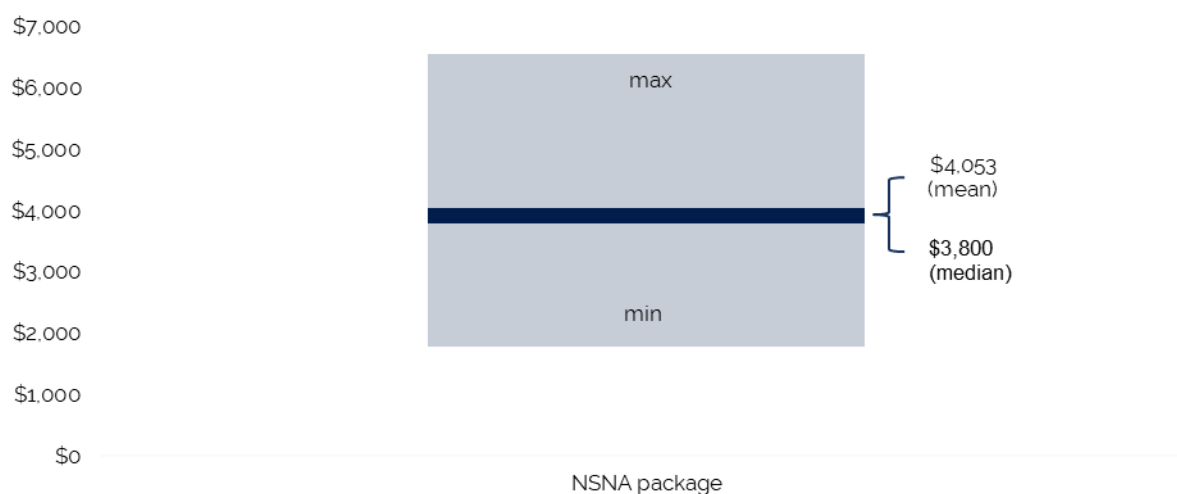
Between our Draft and Final Report, we updated our analysis of funeral prices to capture prices available in NSW between May and June 2021,<sup>d</sup> noting that funeral providers can change their prices at any time. While we found that some funeral providers in the sample had changed their prices since the release of our Draft Report, we did not observe any clear price trends.

In our Draft Report, we analysed prices for standard cremation packages with a ceremony and found that the median price for this product was around \$6,100.<sup>5</sup> When updating our analysis for the Final Report, we found that some funeral providers in our sample who had previously published prices for standard cremation packages with a ceremony were no longer doing so, and instead only publishing the price of their NSNA package. Due to the small number of prices available in the sample for standard cremation packages with a ceremony, we removed this product from our analysis - this is discussed further below.

<sup>c</sup> Our sample was based on a range of funeral providers from a range of areas across NSW who displayed an itemised pricelist on their website in accordance with the funeral information standard. While it was not a random sample, it included a mix of independent funeral providers, as well as those owned by InvoCare and Propel Funeral Partners.

<sup>d</sup> Our Draft Report analysed prices available between December 2020 and March 2021.

Figure 1 Price variation for NSNA cremation



Note: Not all funeral providers publish prices for the cheapest funeral package.  
Data source: Pricing information collected from around 40 funeral provider websites between May and June 2021. Funeral providers can change their prices at any time.

Each funeral type offered by funeral providers usually includes a choice for either cremation or burial. However, our analysis of funeral prices has largely focused on prices for funerals with a cremation. This is because the price of a funeral with a burial may include the price of the burial plot which can vary widely, especially in Sydney.<sup>6</sup> Cremation fees, on the other hand, tend to be less variable, ranging from around \$500 to \$1,400, and are included in the price of a funeral package in our analysis.

In addition to publishing an itemised price list, the funeral information standard requires funeral providers in NSW to publish the price of the least expensive package for the burial or cremation of a body supplied by the funeral provider. Usually, the least expensive package is the NSNA cremation. While many funeral providers publish prices for itemised service components for funerals with a burial, many do not publish the minimum total price for burial funeral packages. Based on available information, we have not found any evidence to suggest that prices charged by funeral providers for funerals with a burial are higher than prices for equivalent services for funerals with a cremation.<sup>e</sup> (Noting that prices for burial plots in a cemetery are not considered in this analysis, as those prices vary substantially, and are not set by funeral providers).

<sup>e</sup> There are some differences in itemised service components for funerals with a cremation and funerals with a burial. For example, funerals with a cremation include a cremation fee (set by the crematorium) and cremation permit and cremation certificate fees (set by NSW Health). These prices do not apply to funerals with a burial. Similarly, funerals with a burial may include a fee for the burial plot and a fee for the burial of the body – these prices do not apply to funerals with a cremation. We found that any differences in prices for funerals with a burial and funerals with a cremation could be explained by differences in itemised service components, described above.

## Professional services fee and coffin are usually the most expensive items

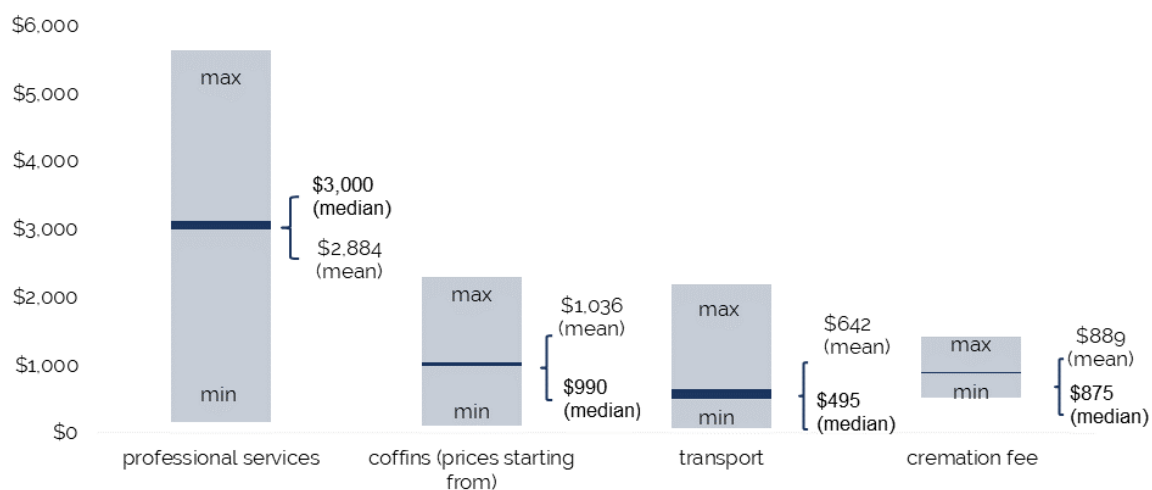
The funeral information standard requires funeral providers to itemise the price of specified components of the service. Funeral providers are not required to itemise their professional services fee which is usually the most expensive item (but many choose to do so). We found that the most expensive components of a funeral are:

- the professional services fee, which is typically around \$3,000
- the lowest advertised priced coffin, which is typically around \$1,000<sup>f</sup>
- the transport fee, which is typically around \$500
- the cremation fee, which is typically around \$900.<sup>g</sup>

Figure 2 (below) shows that the price of each item can vary widely. As discussed above, this analysis excludes the price of a burial plot which can vary from around \$9,400 to \$11,500 in Sydney.<sup>h</sup> It also excludes items usually included in premium funerals, such as catering, which are optional and can vary widely. Australian Funeral Directors Association (AFDA) submitted that memorialisation, catering costs and venue hire (which may not involve a funeral director) can readily exceed the professional service fee.<sup>7</sup> While we agree with AFDA's observation, our analysis has not considered prices for catering, memorialisation or venue hire, because:

- prices for these items are not always displayed on funeral provider websites
- these items can be purchased from other providers or can be avoided entirely.

Figure 2 Price variation for itemised funeral components



Note: Not all funeral providers publish a price for their professional services fee.  
Data source: Pricing information collected from around 40 funeral provider websites collected between May and June 2021. Funeral providers can change their prices at any time.

<sup>f</sup> Our analysis uses the 'prices starting from' price.

<sup>g</sup> A 'typical' price refers to the median price in our sample of funeral provider prices shown on websites.

<sup>h</sup> This is the range for a basic adult lawn burial purchased from the Crown Land Manager run cemeteries in the Sydney metro area. See IPART, Review of interment costs and pricing [Final Report](#), November 2020 Figure 6.2 p 47.

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## Comparison of costs and prices shows that prices are likely to reflect underlying costs

The average cost of providing a funeral, as reported by a sample of funeral providers, is around \$8,000 (for more information see our [information paper on costs](#)). We found that the price of an NSNA cremation package is usually below this (as discussed above). While we have not done a cost build-up for each funeral product, there is little evidence to suggest that prices substantially exceed costs.

## Funeral information standard provides greater pricing transparency

We have found that the funeral information standard (outlined in Box 1) has made it easier for consumers to compare options and prices to make an informed decision about the funeral they purchase. The funeral information standard requires funeral providers in NSW to provide an itemised price list on their website and at their place of business, which includes:

- the price of the cheapest funeral package offered by the funeral provider
- other specified funeral information such as location and the ownership of the mortuary or crematorium used by the funeral provider.

It applies to all NSW funeral directors and any business in NSW that arranges and conducts funerals.<sup>8</sup>

Prior to the introduction of the new funeral information standard in 2019,<sup>i</sup> many people argued that it was difficult for consumers to obtain pricing information from funeral providers in the short time available to arrange a funeral. It was also reported that funeral providers would often require consumers to have a face-to-face meeting before any prices would be disclosed. We consider that the funeral information standard should resolve these issues, if all funeral providers comply with the regulation.

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<sup>i</sup> Prior to the introduction of the current funeral information standard, funeral providers in NSW were required to provide an itemised pricelist within 48 hours of receiving a request.

## Box 1 Funeral information standard – NSW Fair Trading Regulation 2019

All **funeral directors** in NSW are required to display specified funeral information about the goods and services they offer. Funeral information must be displayed at each place of business and on any public website maintained by the funeral director.

Funeral information includes:

- the price of each of the following:
  - transport of body prior to burial or cremation
  - storage of the body at a mortuary or holding room
  - hire of a refrigeration plate
  - type of coffin, casket or shroud or price range of coffins, caskets or shrouds
  - care and preparation of the body prior to burial or cremation
  - viewing of the body prior to burial or cremation
  - arrangement and conduct of a funeral service (ceremony) (including hire of the venue)
  - burial or cremation of the body.
- the location of the mortuary or crematorium used by the funeral director
- if the funeral director uses a mortuary or crematorium that is not owned or managed by the funeral director, the name of the owner or manager
- a reasonable estimate of the following disbursements:
  - the cost of obtaining of a death certificate from the Registrar of Births, Deaths and Marriages
  - the cost of obtaining any certificate or permit required in relation to the body
  - fee charged by a cemetery or crematorium in relation to the burial or cremation.
- the price of the least expensive package for the burial or cremation of a body supplied by the funeral director
- how a body is transported prior to burial or cremation.

In the regulation a **funeral director** means a person who, in the conduct of the person's business, arranges the collection, transport, storage, preparation or embalming of bodies for the purposes of the burial or cremation of bodies.

Source: NSW Fair Trading, [Funeral information standard](#), accessed March 2021



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## Some stakeholders oppose the funeral information standard

We consider that the current funeral information standard (where it is being complied with) is mostly effective, as it allows consumers to obtain key pricing information from multiple funeral providers quickly and easily. We have also recommended improvements to the funeral information standard to enhance comparability (discussed further below). However, some stakeholders raised concerns about the funeral information standard, arguing that:

- it is difficult to compare 'apples with apples' in the funeral industry<sup>9</sup>
- there is a need for further distinction between prices offered by mobile funeral providers and those offered by traditional funeral providers.<sup>10</sup> Some also called for the funeral information standard to specify minimum service standards.<sup>11</sup>
- to make price comparison easier, a central funerals pricing comparison website should be developed.<sup>12</sup>
- it does not apply to all funeral providers, such as those who organise only some funeral activities, or mobile operators without physical premises.<sup>j</sup>

However, we maintain our position that the funeral information standard is largely working well for consumers. While it may not be the only source of information people use to choose a funeral provider, it provides a good basis for them to make further inquiries with funeral providers to find a funeral that meets their needs and budget. The sections below discuss our responses to issues raised by stakeholders.

## Funeral information standard does not prevent emphasis on quality of service

Regarding the funeral information standard, H Parsons Funeral Directors submitted that "the challenge for the consumer (and reputable companies) in these types of enforced exercises – how do you convey the concept of 'quality' – quality of care for the deceased, quality of facilities and quality of staff training".<sup>13</sup> We consider that a requirement to publish an itemised price list does not prevent a funeral provider from providing additional information to emphasise or explain the quality of their service. In our view, it is up to the funeral provider to decide how to differentiate their services from competing providers. The funeral information standard also does not prevent a funeral provider from:

- publishing prices for a range of products (in addition to the price of the cheapest package).
- explaining that additional charges may apply (e.g. for complex body preparation or the need for a larger coffin).

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<sup>j</sup> Some stakeholders raised this concern at the public hearing. For example, see [Public hearing transcript](#), pp 28-30.

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## Insufficient justification for minimum standards or distinction between mobile and traditional providers

Some stakeholders submitted that the requirement to publish the price of the least expensive package should also define what elements must be included in that package. However, we have not found enough evidence to support a need for doing so. For example, National Funeral Directors Associated (NFDA) submitted that:

"a requirement to publish the lowest cost option is flawed [...] to be able to allow a consumer to rate the lowest cost, the standard should be the same. For example – the coffin should be nominated as a chipboard coffin (and free of organochlorines) fixed with six screws lined with 100 um plastic and have a name plate fixed. It should also note the exclusions – number, type and style of handle are options and based on personal choice. It should state that the base price is for a standard coffin for a person less than 1.8 metres high and less than 500 mmm wide at shoulders and they weigh less than 85 kilograms."<sup>14</sup>

We consider that defining minimum standards could disadvantage mobile providers and limit competition and innovation. Consequently, we are not recommending that the funeral information standard specify minimum service standards.

Similarly, some stakeholders such as FDANSW called for a distinction between traditional and mobile funeral providers.<sup>15</sup> In our view, the current funeral information standard provides enough information about whether a funeral provider uses shared facilities (as opposed to facilities that they own and operate), and so there is no need to provide a further distinction between traditional and mobile funeral providers.

## Private firms already provide funeral price comparison website services

Some stakeholders such as Combined Pensioners and Superannuants Association (CPSA) and Catholic Cemeteries and Crematoria called for the development of a Government-run funerals price comparison website.<sup>16</sup> However, we do not consider it is warranted at this time, because (as noted by CPSA and Catholic Cemeteries and Crematoria) there are already private firms such as Gathered Here providing this service. Catholic Cemeteries and Crematoria also submitted that Fair Trading's funeral information standard template should be made compulsory as the only way in which prices can be displayed. While for our interment review, we recommended that cemeteries be required to publish their prices on a consistent basis using prescribed terminology,<sup>17</sup> we do not think this is necessary at this time for funeral providers. We consider that consumers are likely to be more familiar with terminology used in the funeral industry than they are with terminology used in the interment industry.<sup>k</sup> As a consequence, funeral providers with different business models should be able to publish prices in a way that suits their business, provided that they meet the requirements of the funeral information standard.

Our [information paper on regulation](#) of the funeral industry discusses the reasons why we have taken a different approach to the funerals industry and the interment industry in more detail.

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<sup>k</sup> For example, we noted in our interment review that terminology such as 'interment' and 'lift and deepen' are not frequently used outside of the cemeteries and crematoria industry, and so may be unfamiliar to consumers.

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## The funeral information standard applies to a range of businesses in the funeral industry

At the public hearing, some stakeholders expressed concerns that the funeral information standard does not apply to all industry members equally. For example, they suggested that a funeral provider who assists customers with some but not all activities is exempt because they do not call themselves a 'funeral director'.

However, the regulation defines a funeral director as "a person who, in the conduct of the person's business, arranges the collection, transport, storage, preparation or embalming of bodies for the purposes of the burial or cremation of bodies." This includes all types of funeral providers, including mobile operators or other businesses involved in organising one or more of these activities (including if they contract the services of a third party to complete them). We also consider that the funeral information standard is likely to apply to businesses that provide any one or more of these services on a contract basis to other funeral providers (such as mortuary care, embalming or mortuary transport services),

## Around 75% of funeral providers have at least some prices on their website

Out of around 260 funeral providers who operate in NSW, around 75% display at least some pricing information on their website. The level of compliance has increased since we released our Draft Report, where we found that only 65% of funeral providers were publishing any prices.<sup>1</sup> However, at least 20% of funeral providers who are displaying prices are not complying with all aspects of the regulation.

Submissions to our Issues Paper noted that the level of compliance with the funeral information standard is very mixed.<sup>18</sup> For example, many funeral providers are not:

- displaying their prices prominently on their website - many price lists are very difficult to find, despite the regulation requiring funeral information to be prominently displayed
- displaying the total minimum price for the cheapest funeral package – some funeral provider websites say that they 'do not offer packages' and therefore do not publish a total minimum price
- itemising the price of each component specified by the funeral information standard
- disclosing the location of their mortuary and crematorium
- publishing an estimate of the price for a burial plot.

Our recommendations to ensure greater compliance with the funeral information standard are discussed in our [Information Paper on regulation and licensing](#) of the funeral industry. The section below discusses our recommendations for improving the effectiveness of the funeral information standard.

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<sup>1</sup> For our Draft Report we found that around 65% of funeral providers were displaying prices on their website. For our Final Report we revisited the websites of any funeral providers who were not previously displaying prices and found that many more are now doing so - 75% reflects our updated analysis.

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## Some aspects of the funeral information standard require clarification

As discussed above, around a quarter of funeral providers in NSW are not publishing any of the funeral information that they are legally required to, and many of those who are publishing some funeral information are not fully compliant. This includes businesses such as subcontractors to the industry that are involved in one type of service (such as mortuary care, embalming or mortuary transport services).<sup>m</sup> To ensure that funeral providers in NSW clearly understand what information they are required to publish, we recommend that NSW Fair Trading amend both the regulation and supporting information for funeral providers (such as FAQ documents) to:

- provide more guidance on 'prominent display of information' on websites.<sup>n</sup>
- clarify what constitutes a public website for the purposes of the funeral information standard. For example, NSW Fair Trading should clarify that funeral providers must display funeral information on any social media pages that they operate, if the funeral provider does not have a public website.
- clarify that funeral providers must display the total minimum price for the cheapest combination of funeral products and services, regardless of whether they offer 'funeral packages'.
- clarify the different types of business models that are currently captured by the definition of 'funeral director' and provide specific guidance for these types of businesses in the FAQ material.

NSW Fair Trading should address these improvements by updating the funeral director FAQ document and the NSW Fair Trading funeral information standard website landing page to ensure that they can take effect immediately.<sup>19</sup> For the avoidance of doubt, NSW Fair Trading should amend the regulation when it is next reviewed to reflect these points of clarification.<sup>o</sup> Stakeholders such as CHOICE and Cemeteries and Crematoria Association NSW supported our recommendation to clarify aspects of the funeral information standard.<sup>20</sup>

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<sup>m</sup> When we reviewed websites of some subcontractors to the funeral industry, none displayed pricing information.

<sup>n</sup> For example, the Therapeutic Goods Administration provides examples of factors that determine whether a visual advertisement meets the benchmark for prominent display including: font size and type similar to the main representations in the ad, good contrast from background, information should not be buried under pictures. See Therapeutic Goods Administration, [Complying with the Therapeutic Goods Advertising Code \(No. 2\) 2018](#), accessed 25 March 2021.

<sup>o</sup> The NSW Fair Trading Regulation 2019 is currently due to be automatically repealed under the Subordinate Legislation Act 1989 on 1 September 2024.

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## We are recommending some improvements to the funeral information standard

We are also recommending some changes to the funeral information standard to enable easier comparison. As discussed above, the professional services fee is usually the most expensive component of the funeral. We have observed that many funeral providers are not itemising the price of their professional services fee (because they are not required to), and instead list it as 'available on request'. We recommend that NSW Fair Trading amend the regulation to require all funeral providers to publish the price of their professional services fee. Funeral providers who do not charge a professional services fee should publish the price as \$0. This change could be implemented when the regulation is next reviewed.<sup>P</sup>

We explained above that funeral providers in NSW must publish the price of the least expensive package for the burial or cremation of a body supplied by the funeral provider, which is usually a NSNA funeral. We consider that for some consumers a NSNA funeral will not meet their needs. To address this, we are recommending that funeral providers be required to publish the price of the least expensive funeral package with a ceremony, if they offer this product. This will ensure that consumers for whom a NSNA funeral is not suitable can also benefit from greater pricing transparency. As discussed above, since the release of our Draft Report, we found that fewer funeral providers are publishing prices for a standard cremation package with a ceremony and are instead only publishing the price for the NSNA package. We consider that this highlights the need for our recommended improvements to the funeral information standard.

Stakeholders such as Active Directions, Choice and Catholic Cemeteries and Crematoria supported mandatory publication of professional services fees and the price of the cheapest funeral package with a ceremony.<sup>21</sup> Cemeteries and Crematoria Association NSW also suggested that funeral providers should be required to disclose the trading names of other providers that are related entities.<sup>22</sup> As some companies own multiple brands, we consider price comparisons may be less effective if the consumer is unaware they are comparing brands under the same ownership. Disclosure of ownership information could be achieved using the funeral information standard. Rather than listing all trading names of related entities, we recommend that the funeral information standard be expanded to require providers to disclose the ultimate holding company name of the funeral provider.

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<sup>P</sup> The NSW Fair Trading Regulation 2019 is currently due to be automatically repealed under the Subordinate Legislation Act 1989 on 1 September 2024.

## Recommendations

5. That, to improve compliance with the funeral information standard, NSW Fair Trading amend its website and FAQ information about the standard to:
  - provide examples of what constitutes 'prominent display'
  - clarify what constitutes a public website for the purposes of the standard
  - include a definition of the 'least expensive funeral package' to clarify that it is an estimate of the total minimum price for the least expensive combination of products a funeral provider offers to customers, whether or not the funeral provider defines that combination of products as a 'package'
  - provide guidance for the different business models that are captured under the definition of 'funeral director'.
  
6. That, when the regulation is next reviewed, NSW Fair Trading propose the following amendments to the funeral information standard (in addition to the current requirements):
  - require all funeral providers to publish:
    - a. the price of their professional services fee
    - b. the price of the least expensive funeral package that includes a funeral ceremony, for the burial or cremation of a body, if supplied by the funeral provider.
  - clarify that funeral providers are required to publish funeral information on any public website maintained by the funeral provider, and include a link to the funeral information on any social media account maintained by the funeral provider. If the funeral provider does not have a public website but has a social media account, it must publish the funeral information on each social media account.
  - include a definition of the 'least expensive funeral package' to clarify that it is an estimate of the total minimum price for the least expensive combination of products a funeral provider offers to customers, whether or not the funeral provider defines that combination of products as a 'package'.
  - require disclosure of the funeral provider's ultimate holding company.

## New entrants putting downward pressure on lower-priced products

In recent years, changes in the funeral industry appear to be contributing to lower funeral prices, particularly at the lower-priced end of the market. For example:

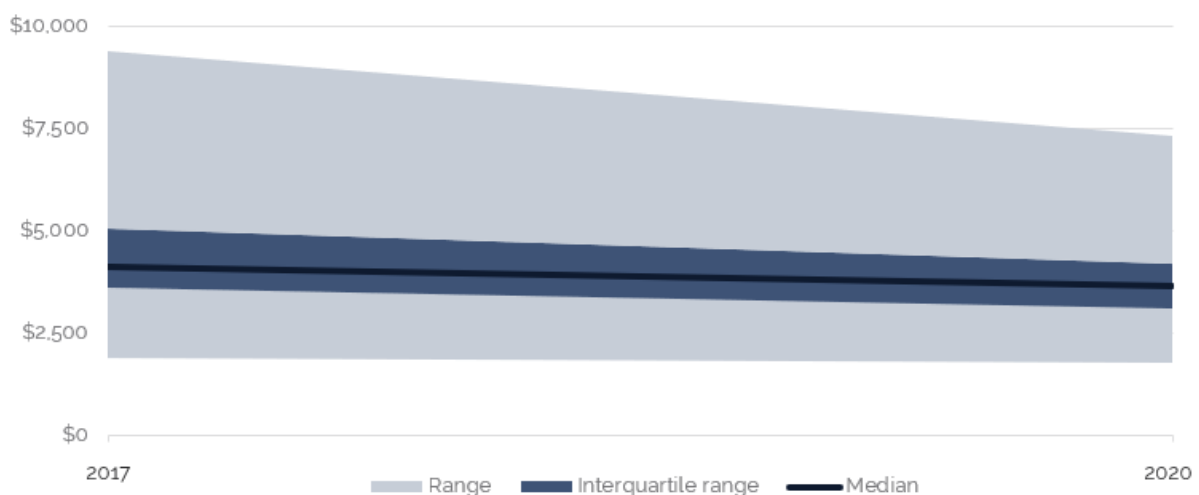
- funeral providers without physical premises have entered the market. These businesses are often referred to as mobile funeral providers, who typically engage a third party to undertake some of the funeral activities (such as transport or body preparation) for them.
- new providers like Tender Funerals and Picaluna have emerged, offering more consumer involvement in the funeral process.
- there has been a trend towards consumers choosing NSNA cremations and basic funeral packages over the last 5 years.<sup>23</sup>

Submitters to our Issues Paper, such as Council on the Ageing (COTA), noted that consumers support the emergence of a broader range of funeral providers.<sup>24</sup>

To understand how prices have changed in recent years, we compared pricing data from 2017 and 2020 provided by funerals pricing comparator website Gathered Here. We found that the price of NSNA cremations in metropolitan areas of NSW decreased substantially between 2017 and 2020. For example:

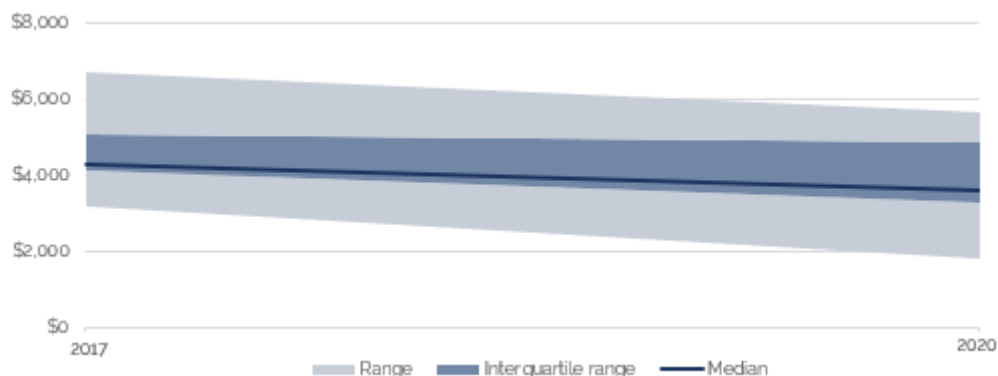
- The median price of a NSNA cremation decreased by between around \$500 to \$800 in Sydney, Wollongong and Newcastle.
- In Sydney, the spread of prices for NSNA cremations appears to be narrowing (See Figure 3). In Wollongong, prices for NSNA cremation prices are clearly decreasing (see Figure 4).

Figure 3 Price changes between 2017 and 2020 – Sydney NSNA cremation



Data Source: Price data purchased from funeral price comparator website Gathered Here.

Figure 4 Prices changes between 2017 and 2020 – Wollongong NSNA cremation

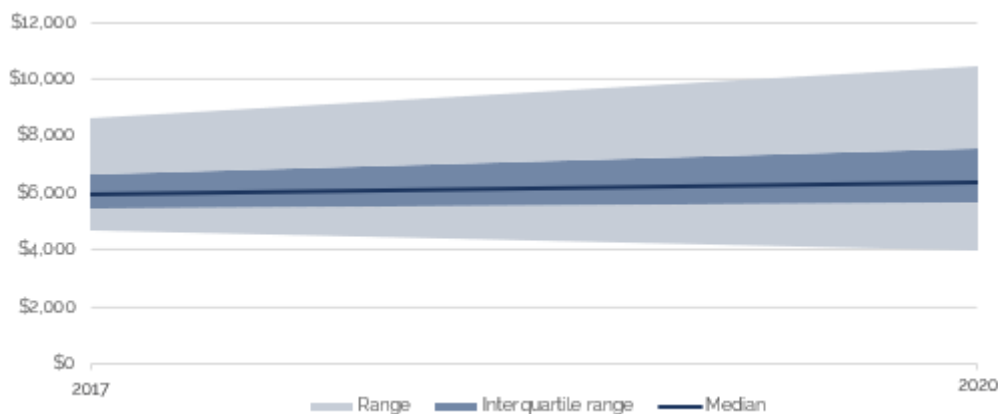


Data Source: Price data purchased from funeral price comparator website Gathered Here.

On the other hand, Gathered Here price data showed that funerals with a ceremony appear to have followed different price trends between 2017 and 2020, depending on the location. We found that:

- The median price for a funeral with a ceremony in Sydney (single and dual service funerals for burial and cremation) increased by between around \$300 and \$600. Figure 5 shows that the spread of prices for a single service cremation in Sydney appears to be widening over time.
- The median price for a funeral with a service in Newcastle decreased for cremations, but increased slightly for burials (single and dual service cremations decreased by around \$250 and \$50, respectively, while single and dual service burials increased by around \$130 and \$50, respectively).
- The median price for a funeral with a ceremony in Wollongong increased for most types of funeral with a ceremony by between around \$200 and \$400, except for single service burials, where the price decreased by around \$30.

Figure 5 Prices changes between 2017 and 2020 – Sydney single service cremation



Source: Price data purchased from funeral price comparator website Gathered Here.

## Prices of the largest providers vary depending on the brand

InvoCare is the largest provider in the funerals market in NSW.<sup>25</sup> We found that its prices vary substantially, depending on the InvoCare brand. We also found that prices offered by Propel Funeral Partners (the second largest funeral provider in NSW) are generally within the range of prices offered by other providers (see Figure 6, below). Our findings were based on price lists that are publicly available on InvoCare's and Propel Funeral Partner's websites. (Noting that, with some exceptions, most price lists show the total price of the NSNA cremation package, but not the total price for funeral packages with a ceremony).

InvoCare has around 26% market share, and is vertically integrated.<sup>26</sup> As well as multiple funeral brands, it operates 10 cemeteries and crematoria in NSW, and many other related businesses.<sup>27</sup> Propel Funeral Partners is the second largest provider, with around 6% market share.<sup>28</sup> Both InvoCare and Propel Funeral Partners have acquired a number of small funeral businesses in recent years, often retaining the brand name of the small business.<sup>29</sup>



In addition to the small funeral homes that InvoCare operates, it has three national brands, and one state-wide brand with that target different segments of the market. These include:

- **Value Cremations** - online-only direct cremation provider offering affordable cremation services.
- **Simplicity Funerals** - simple, functional and affordable funerals.
- **Guardian Funerals** – offers funerals ranging from a small intimate family service to a large-scale State funeral.
- **White Lady Funerals** - offers customers a high level of customer service.<sup>30</sup>

Based on our sample of prices from around 40 funeral provider websites (which included a number of InvoCare brands), Figure 6 shows that the Guardian price for a NSNA cremation in Ballina is substantially higher than the median price for an NSNA cremation (around \$3,800).<sup>q</sup> However, the Simplicity price for a NSNA cremation is very close to the median,<sup>r</sup> and Value Cremations is substantially cheaper.<sup>s</sup> InvoCare submitted that it caters to the differing needs and circumstances of customers by offering a variety of brands, which reflect not only different price points but also different areas of focus.<sup>31</sup>

Figure 6 Comparison of InvoCare, Propel and other funeral provider prices



Funeral providers are not required to publish their professional services fee, although many do. Some InvoCare brands have different prices for different areas in NSW.

Data source: Pricing information collected from around 40 funeral provider websites collected between May and June 2021. Funeral providers can change their prices at any time.

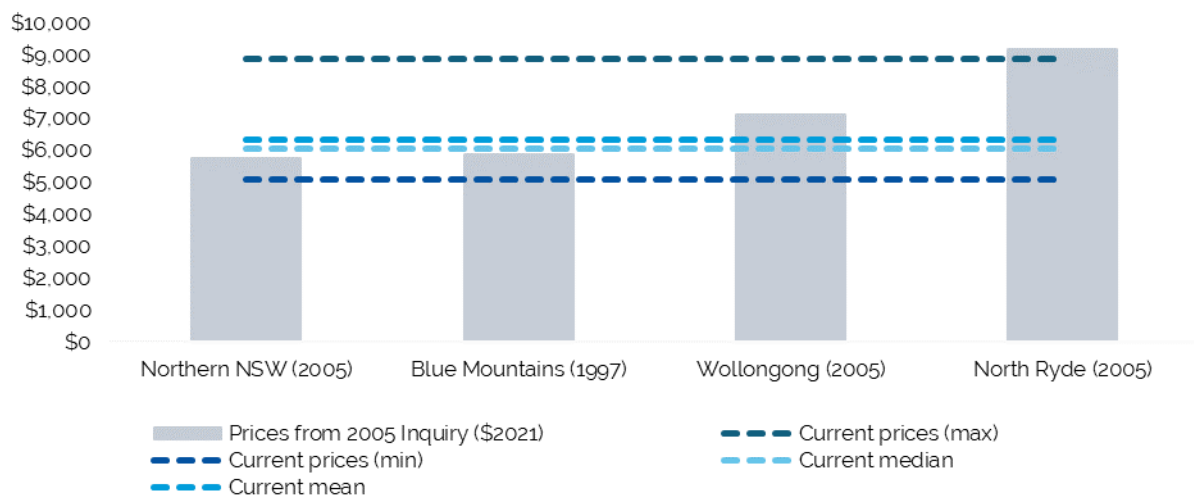
<sup>q</sup> Figure 2 shows that the median price for a NSNA cremation is around \$3,800.

<sup>r</sup> The Simplicity Basic Package in Sydney is \$3,995. See Simplicity Funerals, [Cremation funeral packages](#), accessed 16 June 2021.

<sup>s</sup> **Error! Reference source not found.** shows that Value Cremations price for a NSNA cremation is \$1,790.

COTA submitted that there is "wide-spread concern about a lack of choice [in the funeral industry]... even in the metropolitan area, choice is limited by the developing duopoly. This translates into a situation where funeral costs are set by the large providers – and what seems to consumers to be a never-ending increase in the costs".<sup>32</sup> To test this, we compared pricing data published in the 2005 NSW Standing Committee on Social Issues inquiry into the Funeral Industry to the prices we found in the market between December 2020 and March 2021 for a standard cremation package with a ceremony. While the sample of prices in 2005 is small, Figure 7 shows there is little evidence to suggest that prices have changed substantially in the last 15 years, after adjusting for inflation.

Figure 7 Comparison of funeral prices for a standard cremation package in 2005 and 2021 (\$2021)



Note: 2021 prices collected for standard cremation packages with a ceremony  
 Data source: Standing Committee on Social Issues, [The funeral industry](#), December 2005, pp 23-24; pricing information collected from around 40 funeral provider websites collected between December 2020 and March 2021.

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- <sup>1</sup> For example, see Carers NSW, submission to IPART Issues Paper, December 2020, p 1. Choice submission to IPART Issues Paper, December 2020, p 3; CPSA submission to IPART Issues Paper, December 2020, p 3.
  - <sup>2</sup> [Ministerial media release](#), 15 April 2021
  - <sup>3</sup> For example, see Funeral Directors Association of NSW, submission to IPART Draft Report, May 2021, p 5.
  - <sup>4</sup> Cemeteries and Crematoria NSW, [Understanding your choices](#), accessed 24 March 2021.
  - <sup>5</sup> IPART [Review of the funeral industry in NSW Draft report](#), April 2021, p 10.
  - <sup>6</sup> For more information on prices for burial plots, see IPART, [Draft Report - Review of interment costs and prices in NSW](#), September 2020.
  - <sup>7</sup> AFDA submission to IPART Draft Report, May 2021, p 1.
  - <sup>8</sup> NSW Fair Trading, [Funeral Information Standard](#), accessed June 2021.
  - <sup>9</sup> See Funeral Directors Association, submission to IPART Draft Report, May 2021, p 5; National Funeral Directors Association submission to IPART Draft Report, May 2021, p 1.
  - <sup>10</sup> Funeral Directors Association of NSW, submission to IPART Draft Report, May 2021, pp 5-6.
  - <sup>11</sup> National Funeral Directors Association submission to IPART Draft Report, May 2021, p 1.
  - <sup>12</sup> Catholic Cemeteries and Crematoria, submission to IPART Draft Report, May 2021, p 4.
  - <sup>13</sup> H Parsons submission to IPART Issues Paper, November 2020, p 4.
  - <sup>14</sup> NFDA submission to IPART Draft Report, May 2021, p 1.
  - <sup>15</sup> Funeral Directors Association of NSW, submission to IPART Draft Report, May 2021, pp 5-6.
  - <sup>16</sup> CPSA submission to IPART Issues Paper, November 2020, p 4, Catholic Cemeteries and Crematoria, submission to IPART Draft Report, May 2021, pp 3-4.
  - <sup>17</sup> IPART, [Review of interment costs and Pricing Final Report](#), November 2020, p 103.
  - <sup>18</sup> For example, see CPSA submission to Issues Paper, November 2020, p 4; W. Morrow, submission to Issues Paper, November 2020, p 3; Council on the Ageing, submission to IPART Issues Paper, December 2020, p 12.
  - <sup>19</sup> NSW Fair Trading, [FAQs for funeral directors](#), accessed March 2021.
  - <sup>20</sup> Cemeteries and Crematoria Association NSW, submission to IPART Draft Report, May 2021, p 4.
  - <sup>21</sup> Active Directions, submission to IPART Issues Paper, p 2.
  - <sup>22</sup> Cemeteries and Crematoria Association NSW, submission to IPART Draft Report, May 2021, p 2.
  - <sup>23</sup> IBISWorld, [Funeral Directors, Crematoria and Cemeteries in Australia](#), September 2020, p 13.
  - <sup>24</sup> Council on the Ageing, [Submission to IPART Issues Paper](#), December 2020, p 14.
  - <sup>25</sup> IBISWorld, [Funeral Directors, Crematoria and Cemeteries in Australia](#), September 2020, p 8.
  - <sup>26</sup> Based on InvoCare's national market share, see Ibis World, [Funeral Directors, Crematoria and Cemeteries in Australia](#), September 2020, p 8.
  - <sup>27</sup> InvoCare, [Our brands](#), accessed 31 March 2021.
  - <sup>28</sup> IBISWorld, [Funeral Directors, Crematoria and Cemeteries in Australia](#), September 2020, p 8.
  - <sup>29</sup> IBISWorld, [Funeral Directors, Crematoria and Cemeteries in Australia](#), September 2020, p 26.
  - <sup>30</sup> InvoCare, submission to IPART Issues Paper, December 2020, p 4.
  - <sup>31</sup> InvoCare, submission to IPART Issues Paper, December 2020, p 3.
  - <sup>32</sup> Council on the Ageing NSW, submission to IPART Issues Paper, December 2020, p 17.