



AUSTRALIAN FUNERAL DIRECTORS ASSOCIATION

14 May 2021

Jennifer Vincent – Director, Pricing
IPART, Level 16, 2-24 Rawson Place
Sydney NSW 2000

Dear Jennifer,

The Australian Funeral Directors Association (AFDA) wishes to thank IPART for the opportunity to present at the 29 April 2021 On-Line Public Hearing and the fair and balanced draft review of Competition, Costs and Pricing in the Funeral Industry. AFDA considers the review objective, and without a pre-conceived narrative.

The review is overwhelmingly representative of the consumer experience in the NSW funeral market and is not skewed to a complaint experience of less than 1%, namely 0.044% (i.e., 22 complaints to NSW Fair Trading in 2019 out of approximately 50,000 deaths, or four complaints out of every 10,000 funerals).

Similarly, ACCC receives less than 100 complaints out of approximately 150,000 deaths in a year which is less than 0.067%, or 7 complaints out of every 10,000 deaths. People are often vulnerable at the time of a loved-one's death but they do not remain vulnerable forever. Our members' experience is that aggrieved consumers act promptly to seek redress from the funeral director – usually within days of the funeral.

AFDA confirms that 100% of AFDA NSW members display pricing on their websites and AFDA supports IPART's draft recommendations to increase the incidence, completeness, clarity and enforcement of proper pricing information in the industry.

AFDA respectfully requests IPART to clarify that the review is a 3 yearly statutory requirement rather than a reaction to industry concerns. (ACCC has mentioned CHOICE and IPART, among other reasons, for its focus on the funeral industry).

AFDA also requests IPART to correct/qualify/modify the blanket assertion that 'the most expensive items in a funeral are usually the professional service fee and the coffin' (page 11) when in fact burial costs, relevant to a significant proportion of deaths, often exceed the professional service fee and can exceed all funeral director costs combined.

- The Funeral Prices Information Paper expressly excludes consideration of prices for burial plots (page 4) but the main report does not.
- Costs of memorialisation can also exceed funeral director fees.
- Catering costs for food, beverages and venue hire (which may not involve a funeral director) can readily exceed the professional service fee.
- Request greater clarity on the checklist and questions to ask a funeral director, it is very misleading based on their example.
- The NSW Health form – Authority to collect deceased- AFDA believes the form should not be available for the Public to download and complete, in order to not create a situation where a family have signed the document, and arrive at a Hospital Mortuary in their own vehicle to conduct a transfer. In this instance the Hospital may think they are simply another funeral director.

Promoting

professional

funeral standards

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AFDA also recommends the creation of a clear register of who is operating as a funeral director and this should include the “celebrants” who purport to be funeral directors and people such as death doulas.

Regarding providers who exclusively offer direct cremations (e.g., Bare Cremation), transparency with consumers around the engagement of sub-contractors should be compulsory, and advertising which compares direct cremation pricing with funeral ceremony pricing through traditional funeral directors should be outlawed as misleading, given IPART’s findings that the two distinct offerings represent two distinct funeral markets.

For any further information, I can be contacted on ([REDACTED])

Yours sincerely

[REDACTED]

Dale Gilson
Chief Executive Officer