



Review of the funeral industry in NSW:
Competition Assessment

Technical Paper

June 2021

Robust competition improves outcomes for consumers by providing them with plenty of choice at a range of different service levels and price points. Competition between providers also makes it more likely that consumers will be charged a fair, cost-reflective price for the services they purchase.

In NSW there are around 260 funeral providers, with different business models, price points and levels of service. They range from large, vertically integrated businesses that operate multiple brands and branches, to locally based, independent family-run businesses.

We assessed the current state of competition in the NSW funeral industry. We analysed several markets with different product dimensions:

- Funerals with a ceremony markets – these markets have geographic dimensions with 4 Sydney sub-metropolitan markets, citywide markets for NSW's major cities and regional markets throughout NSW.
- No service no attendance (NSNA) markets – specialised NSNA providers operate state-wide.

In defining these markets, we were deliberately conservative. That is, we chose narrower market definitions where evidence was inconclusive. We consider if a narrower market is workably competitive, the broader market will also be workably competitive.

Overall, we found that each of these markets is workably competitive. We also assessed competition among crematoria in NSW, finding it is workably competitive.

IPART Findings

1. NSW funeral markets are workably competitive.
2. The NSW crematoria market is workably competitive.

Table 1 Summary of IPART's findings by product type and location

	Funerals with a ceremony	No service no attendance (NSNA) funerals
Sydney - Eastern/Central, Western and Southern	The 'funeral with a ceremony' markets in these areas are workably competitive. We see low levels of market concentration. Competition appears to be focused on service quality.	The state-wide 'NSNA cremation' market is workably competitive. We found evidence of strong price competition.
Sydney - Northern	The Northern Sydney area has the highest concentration of ownership of any of the Sydney markets. InvoCare operates most funeral homes in the area; however, we consider competition is constraining InvoCare's prices and maintaining its need to provide high quality funerals with a ceremony. We consider competition has grown and continues to grow since the ACCC found competition concerns in 2011.	
Newcastle, Wollongong and Central Coast	These 'funeral with a ceremony' markets are workably competitive. We see low concentration of ownership, and clear evidence of price competition in Newcastle and Wollongong, where we focused our analysis.	
Regional areas	The 'funeral with a ceremony' markets in regional areas are workably competitive.	
Rural and remote areas	There is limited competition in rural and remote areas of NSW. Many factors work together to limit market power in these areas.	

How we assessed competition

Our starting point was the ACCC competition assessment in 2011

In 2011 the ACCC considered InvoCare's acquisition of Bledisloe Group, which owned funeral director businesses, cemeteries and crematoria in 4 states including NSW. As part of its consideration, the ACCC undertook a public competition assessment of funeral, cemetery and cremation markets in Sydney, Melbourne, Brisbane and the Gold Coast.

The ACCC considered the product and geographic dimensions of relevant funeral markets (finding functional and temporal dimensions of these markets not relevant to the transaction):

1. **Product/service dimension** – the ACCC found funeral directing is distinct from its component parts (e.g. mortuary services, conducting ceremonies and flowers).
2. **Geographic dimension** – the ACCC found that a local presence is important on the demand side, and associated customer loyalty constrains supply-side substitution and entry. The ACCC defined 4 markets within the Sydney metropolitan area, and a single market within the Gold Coast metropolitan area.^a

The ACCC found that there were high barriers to entry in the metropolitan funeral markets. The ACCC found that the main barrier was the need to build a local reputation and obtain customer loyalty. The ACCC consider the capital costs of expanding an existing business were not high.¹

The ACCC raised no competition concerns in three of the markets within the Sydney metropolitan area. However, the ACCC found that the Northern Sydney funeral market:

- Would be highly concentrated if the merger were approved without an undertaking to divest one of the acquired Bledisloe businesses.
- Competition issues could arise from the lack of transparency about brand ownership. Customers seeking to compare prices may not realise they are comparing prices from within one company.

The ACCC approved the acquisition, with an undertaking from InvoCare to divest the Gregory & Carr funeral business to ensure that InvoCare had a competitive restraint in the Northern Sydney market.

^a The Gold Coast market is relevant to our analysis as it informs our sub-market definitions in NSW's major cities and includes Tweed Heads. The ACCC also looked at Brisbane and Melbourne, which are not relevant to our review.

The ACCC also considered the product and geographic dimensions of relevant cremation markets (again, finding functional and temporal dimensions of these market not relevant to the transaction):

3. **Product/service dimension** – the ACCC found that the cremation market is distinct from the burial market.
4. **Geographic dimension** – the ACCC found that the proximity to funeral directing services was an important constraint. The ACCC defined the same geographic markets for crematoria and funeral directing in the markets it considered both services.^b

The ACCC did not consider the competitiveness of any NSW cremation market.

Cremation markets might be regarded as functionally distinct from funerals, rather than distinct product markets, as cremations are common inputs to funerals. However, nothing in our analysis depends on this question. Furthermore, no issues arise in relation to the temporal dimensions of these markets.

We adopted the ACCC's market definitions

We used the ACCC's definitions of the funeral markets for major cities:^c

- Adopting the four sub-metropolitan markets in Sydney
- We applied the Gold Coast single city-wide market definition to the NSW cities of Newcastle, the Central Coast and Wollongong, given their similarity to the Gold Coast in size and proximity to the state capital.^d

NSW major cities are relatively closely clustered. Therefore, funeral providers in our major cities typically focus on the major city market.

The ACCC did not consider NSW markets outside Sydney in 2011. However, most funeral markets centred in smaller cities and towns also supply nearby countryside and smaller towns. This creates regional funeral markets where the market extends beyond the city limits and into the surrounding countryside and smaller towns. Some markets may incorporate multiple small towns.

We have not defined each regional funeral market, given the large number, but we have found that the area of a regional market depends largely on:

- the proximity, and size, of other cities and large towns
- the population density in the surrounding regions.

Funeral markets in smaller population towns and regions will typically cover a much wider area (e.g. Inverell and Glen Innes are likely to be a single funeral market extending hundreds of kilometres in all directions). More heavily populated regions will have denser funeral markets (e.g. Bathurst and Orange are likely to be separate funeral markets).

^b The ACCC considered crematoria and funeral directing markets in Brisbane.

^c The ABS defines a major city as an urban area with over 100,000 residents.

^d We also consider the city-wide definitions apply to Tweed Heads as part of the Gold Coast market, and Queanbeyan as part of the Canberra market.

What we found

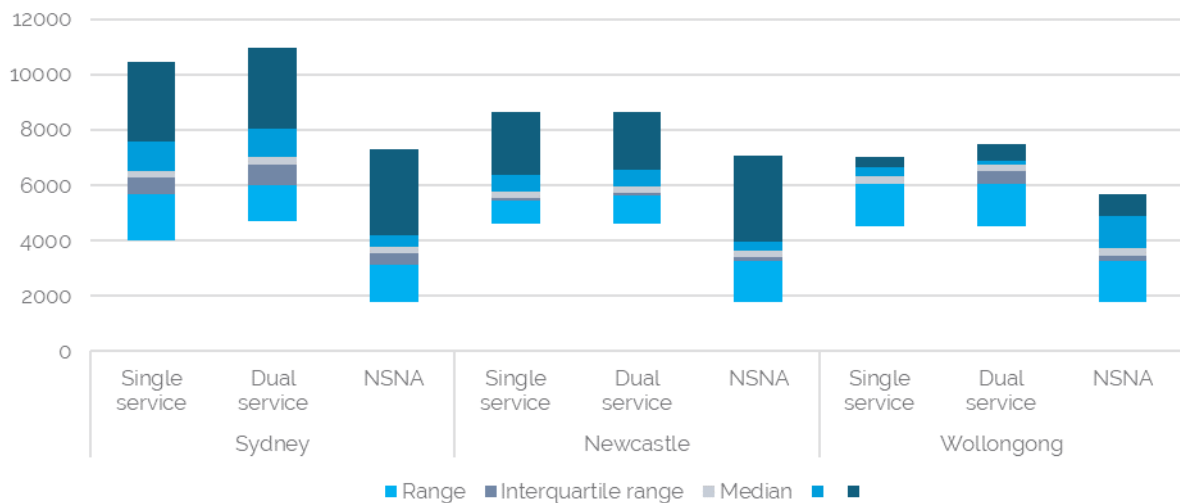
NSNA cremations are a growing part of the funeral industry

Since 2011, the 'no service no attendance' (NSNA) cremation services have grown, with specialist providers that focus on NSNA services.

We analysed prices of different funeral service offerings (see Figure 1). This shows that NSNA are significantly lower priced than funerals with a ceremony.

NSNA are the most standardised funeral available. They do not include a ceremony or associated products like stationery, flowers, catering or audio-visual presentations, and there are minimal interactions with mourners after the transfer of the body (i.e. no viewing of the body prior to disposition, no mourners attending disposition).

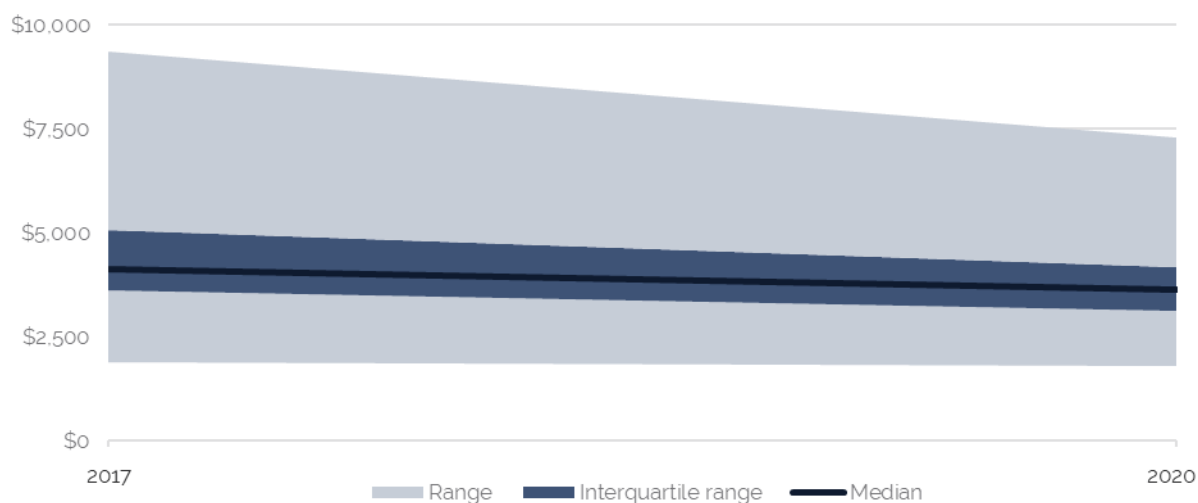
Figure 1 Comparing the prices of different cremation services in Sydney, Newcastle and Wollongong (2020)



Note: This figure shows only cremation options. Single and dual service refer to the number of ceremonies performed. We also analysed burial prices but have not presented them in this figure. Prices for burial services and cremation services are not easily compared. Burial options do not include the costs of a burial plot or interment, while cremation prices include the costs of cremating the body. Source: Price data purchased from funeral price comparator website [Gathered Here](#).

Prices for NSNA funerals have decreased between 2017 and 2020 (see Figure 2). Decreasing prices is a strong indicator of a competitive environment, particularly for a relatively homogeneous service offering.

Figure 2 Prices of NSNA cremations in Sydney between 2017 and 2020

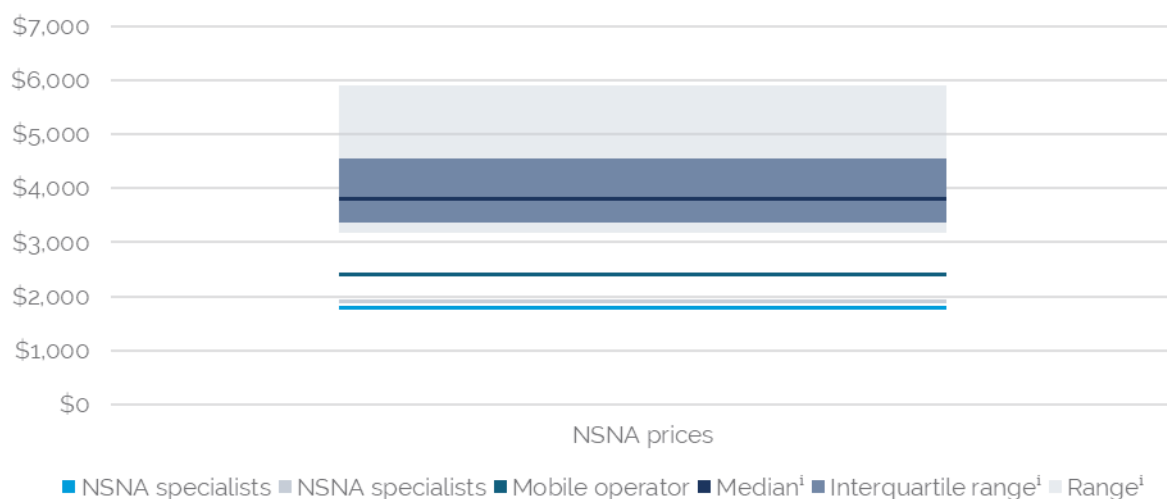


a. Note Number

Source: Price data purchased from funeral price comparator website [Gathered Here](#).

The most important prices for a competition assessment in the NSNA market are the minimum prices in Figure 1 and Figure 2.^e This is because most funeral providers can provide a NSNA cremation, but specialist NSNA providers do so at a lower cost, as we show in Figure 3.

Figure 3 Prices for NSNA cremations in NSW 2020



a. Range, interquartile range and median statistics for traditional funeral providers.

Source: IPART analysis of 27 funeral provider public price disclosures.

^e This is not the case for funerals with a ceremony.

The price of an NSNA is typically around 50% of the price of the lowest price 'funeral with a ceremony' available. This suggests that consumers are unlikely to substitute between NSNA cremations and funerals with a ceremony, unless there was a very large price increase.^f

Figure 3 shows that the prices of NSNA services are provided by NSNA specialists are far lower than traditional funeral providers offering a similar product. This is likely due to low overheads and potentially economies of scale developed from focusing on one specialised service. This price differential suggests that it may be difficult for traditional funeral providers to offer prices that are competitive with NSNA providers, due to the cost structures necessary to provide a traditional funeral product.

The two competitive threats to NSNA specialists are:

- Large funeral companies: we note InvoCare now has an NSNA specialist brand Value Cremations that offers a competitive price.
- Mobile funeral providers with low overheads, which already offer lower NSNA prices than traditional funeral providers.^g

The NSNA specialists also operate over wider areas than the ACCC's market definition. Providers such as Bare Cremations offer a product to almost all of NSW, and there are minimal barriers to entry for interstate operators to compete within NSW, particularly in the border regions.

NSNA services, provided by NSNA specialists, are a relatively new development in the funeral industry, so definitive analysis is difficult. On the available evidence, NSNA specialists operate across broader geographic areas than traditional funeral providers and the relevant geographic market is probably state-wide.

There also appears some actual, and further potential for, supply-side substitution. At this stage we see that many traditional funeral providers will offer an NSNA service (though typically at an uncompetitive price) and some NSNA specialists have started offering memorials (i.e. ceremonies without the deceased present). While it appears unlikely that NSNA services form their own product market, it is too early to reach definitive conclusions on their likely impact on funeral product markets.

^f i.e. if a hypothetical NSNA monopolist could conduct a small but significant non-transitory increase in prices without losing many customers to funeral with a ceremony providers.

^g i.e. if a hypothetical NSNA monopolist could conduct a small but significant non-transitory increase in prices traditional funeral providers would likely have difficulty supply-side substituting or entering the market and offering a competitive product, but mobile operators and very large companies may be able to do so.

Mobile funeral providers are changing the market dynamics

Mobile funeral providers are a small but growing part of the funeral industry. Mobile funeral providers typically:

- may not operate a storefront, meeting families at their homes or in shared office spaces
- outsource transport and/or mortuary services
- operate across the geographic markets defined by the ACCC, typically across all 4 Sydney markets, but also into Wollongong, the Central Coast and Newcastle.

Mobile funeral providers have grown since the ACCC competition assessment in 2011. There are at least 10 mobile funeral providers in NSW, including:

- Picaluna – launched in 2016 and operates across Sydney, Newcastle, the Central Coast, the Southern Highlands and the Blue Mountains²
- Sydney Funerals – launched in 2020³ and operates across Sydney, Wollongong, the Central Coast, the South Coast, Southern Highlands and the Blue Mountains.
- Simplicity Funerals – part of InvoCare offers its 'Simplicity mobile funeral arranger' service in Newcastle and Wollongong.⁴

This has been supported by greater availability of outsourced funeral industry facilities. For example, Mortuary Support Services has operated an independent mortuary for the last 8 years.⁵ However, they remain a small share of funeral markets. The emergence of this type of funeral provider has implications for both product and geographic market definitions.

Mobile funeral providers have low overhead costs. This allows them to offer competitive funeral products, both in terms of NSNA cremations and for funerals with a ceremony. In relation to product market definitions, mobile funeral providers sit between the NSNA cremation market and the funeral with a ceremony markets defined by the ACCC in 2011. They offer potential supply-side substitution to both markets, and demand-side substitution to the funerals with a ceremony markets. Consequently, mobile funeral providers tend to integrate these fields of rivalry, likely operating and promoting competition in integrated funeral product markets.

In terms of traditional funeral providers, in 2011, the ACCC stated:

While the ACCC noted that some funeral directors may be willing to travel across a metropolitan area to provide funeral services, it was nevertheless considered that a hypothetical monopolist within a sub-metropolitan area would be likely to be able to profitably impose a small but significant non-transitory increase in price.⁶

We consider that mobile funeral providers are putting pressure on the geographic market definitions that the ACCC found in 2011. However, on balance, we think that they do not currently have the scale and customer loyalty/awareness to adopt a different market definition.ⁿ

ⁿ A hypothetical monopolist in a sub-metropolitan market (e.g. western metropolitan Sydney) would still likely be able to profitably increase its prices by 5% to 10%. However, this is less clear today than it was in 2011.

The growth of mobile funeral providers also suggests the level of barriers to entry has changed since the ACCC's findings in 2011. The ACCC found it would take 3 to 5 years for a business to become viable.⁷ Mobile funeral providers may now provide a pathway to build a customer base and grow to a viable business size much faster, given low overheads and ability to supply a larger geographic area.

We expect that in time mobile operators could grow as a share of the market, and more traditional funeral providers may offer mobile services to compete. This would drive a more integrated product and Sydney-wide market for funerals, potentially spanning from Wollongong to Newcastle.

There are funeral providers serving most communities in NSW

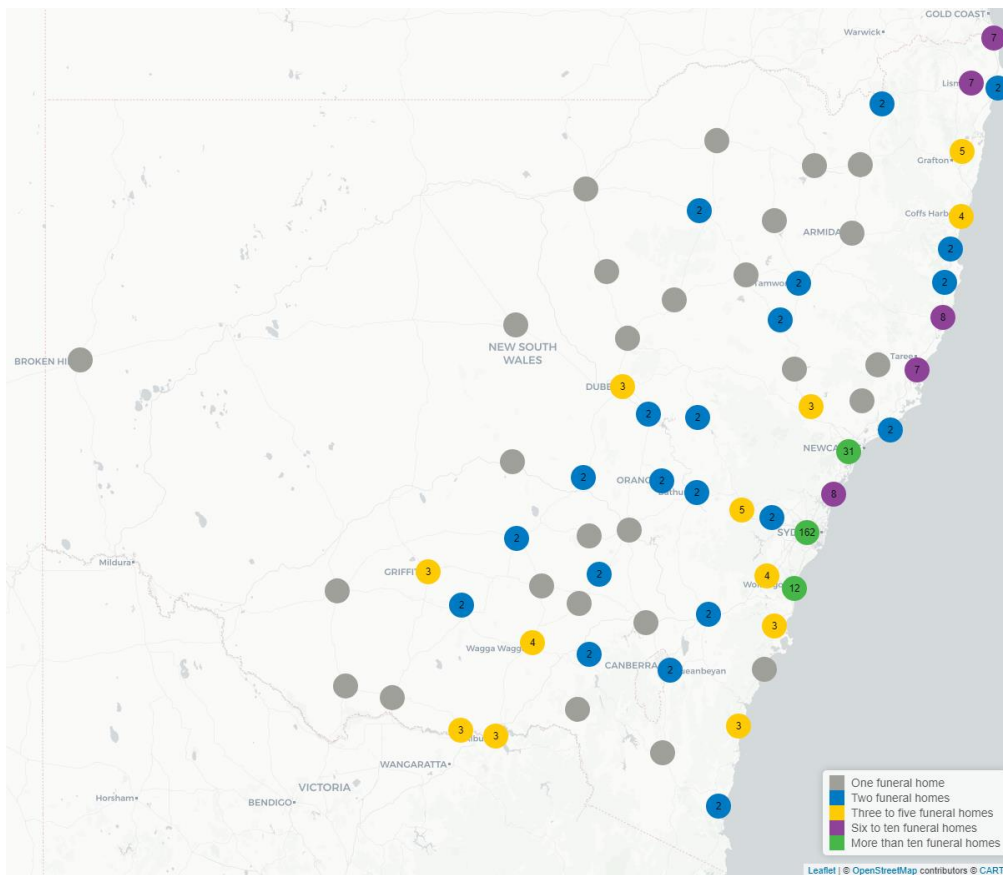
We have found workable competition across NSW regional markets (see Figure 4). We have found competition where there is sufficient population to support multiple providers. Some towns have a single funeral provider.

The NSW Aboriginal Land Council raised concerns that there is a lack of competition in markets with a single funeral provider.⁸ We have found that in most of these small markets there is:

- The threat of expansion from neighbouring markets and mobile providers
- The option of low cost NSNA cremations from state-wide specialist providers and/or
- Community pressure to charge reasonable prices.

All these factors work to constrain funeral provider behaviour. That is, they may have a local monopoly, but their monopoly is constrained and unstable. Additionally, providers likely compete in territory between their physical premises. The additional price transparency created by the Funeral Information Standard allows all customers to benefit from this competition, and effectively reduces the number of single funeral provider markets.

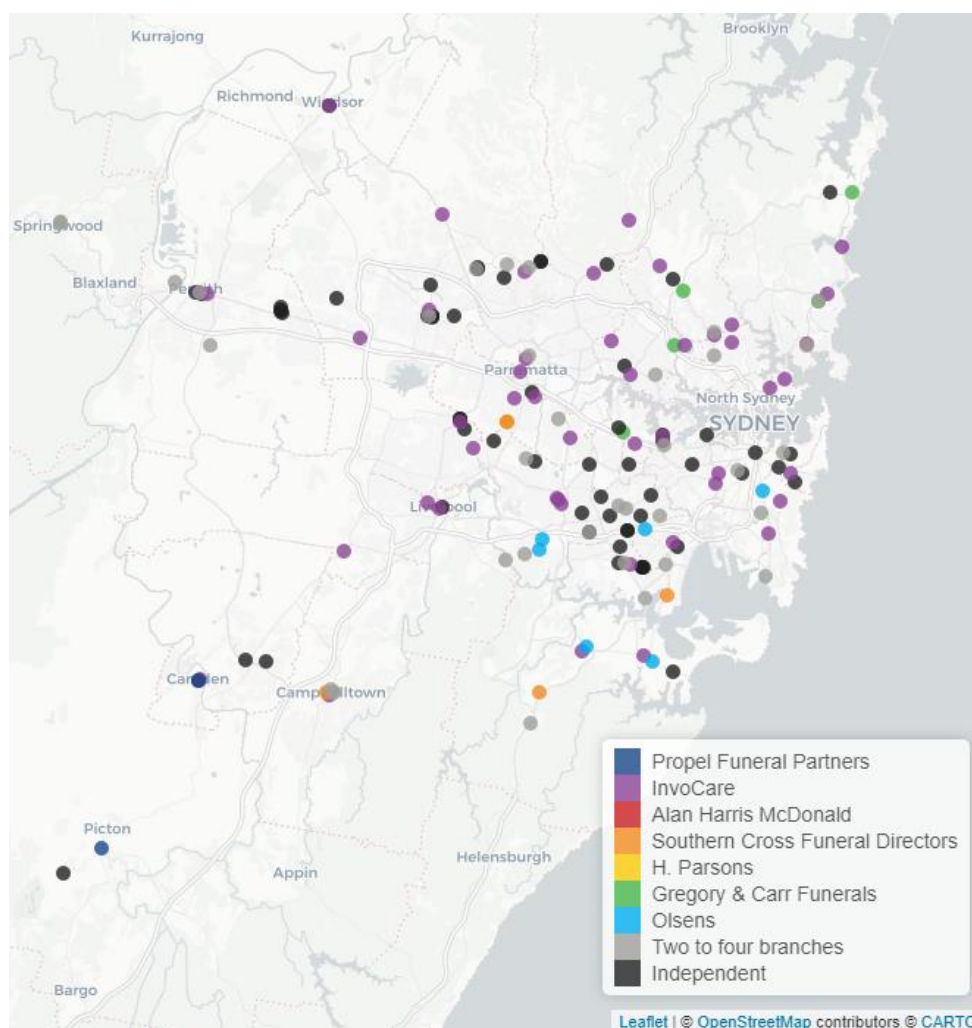
Figure 4 Funeral provider premises in NSW



Note: This map does not include funeral providers without a physical location.
Data source: IPART's analysis of funeral providers. Map created using Leaflet, with background provided by OpenStreetMap and Carto.

Most of Sydney has a wide range of funeral providers, with high customer satisfaction. This is a strong indication that customers have choice and the markets are competitive. However, the Northern metropolitan Sydney market has a high concentration of InvoCare branches (see Figure 5).

Figure 5 Funeral providers in Sydney



Note: In some instances two funeral providers are located very close together. Not all funeral providers are easily viewable on this map. Additionally it does not include funeral providers without a physical location.

Data source: IPART's analysis of funeral providers. Map created using Leaflet, with background provided by OpenStreetMap and Carto.

In 2011, the ACCC noted concern within the Northern Sydney market. The ACCC identified that, without the divestment of Gregory & Carr, InvoCare's acquisition of Bledisloe would likely substantially lessen competition,⁹ with other providers in Northern Sydney unable to provide an effective constraint on InvoCare's misuse of market power.¹⁰

In 2021, we have found that market concentration in the Northern Sydney sub-metropolitan remains high. InvoCare operates over 50% of physical funeral homes in the region. However:

- the growth of the mobile funeral provider model and NSNA specialists provides more competitive pressure now
- we have seen no evidence that InvoCare has a dominant market position or that it is misusing a dominant position
- Gregory & Carr remains a large funeral provider in northern metropolitan Sydney, likely remaining an effective competitive constraint on InvoCare.

On balance, we consider northern metropolitan Sydney has a workably competitive funeral with a ceremony market.

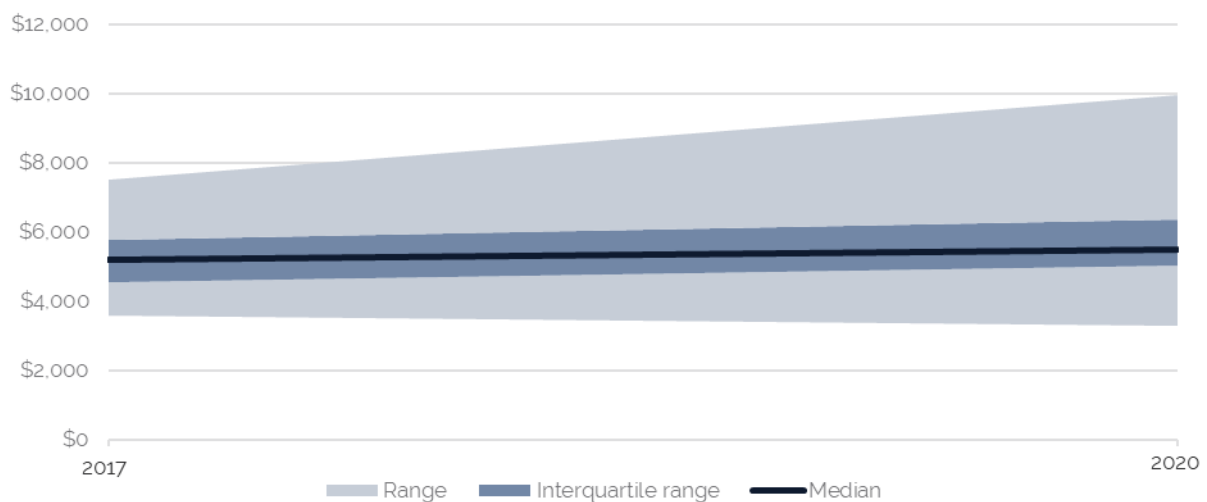
Our price analysis found workably competitive markets in major cities

We looked at prices of funerals with a ceremony across the state, with particular focus on Sydney, Newcastle and Wollongong. We found different trends in different cities.

In Sydney, most funerals with a single ceremony prices increased between 2017 and 2020 (see Figure 6). This could reflect:

- increases in Sydney-specific costs (e.g. increasing rents, property prices),ⁱ and
- funeral providers primarily competing on product quality given Sydney's high income and wealth levels relative to NSW as a whole.

Figure 6 Funeral prices in Sydney 2017 and 2020 (single ceremony burials)



Note: The prices are nominal and do not include burial costs.

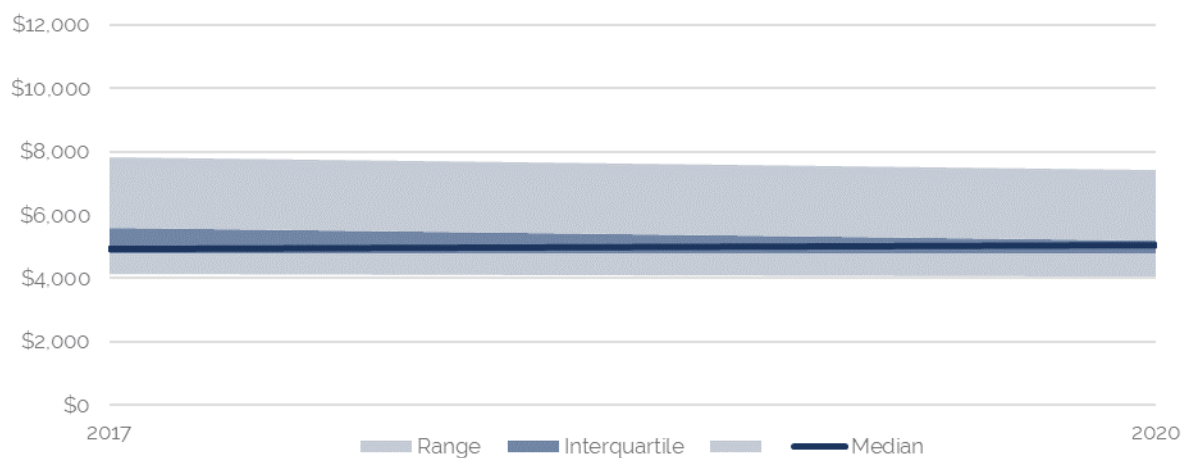
Data source: Price data purchased from funeral price comparator website [Gathered Here](#).

Over the same time period, prices are generally falling or flat in Newcastle (Figure 7) and Wollongong (Figure 8).^j Both cities have numerous funeral providers, with different owners. We consider that the funeral markets in major cities are workably competitive.

ⁱ We note that the minimum prices have not increased, this may indicate that cost pressures do not apply to all market participants, such as mobile funeral providers.

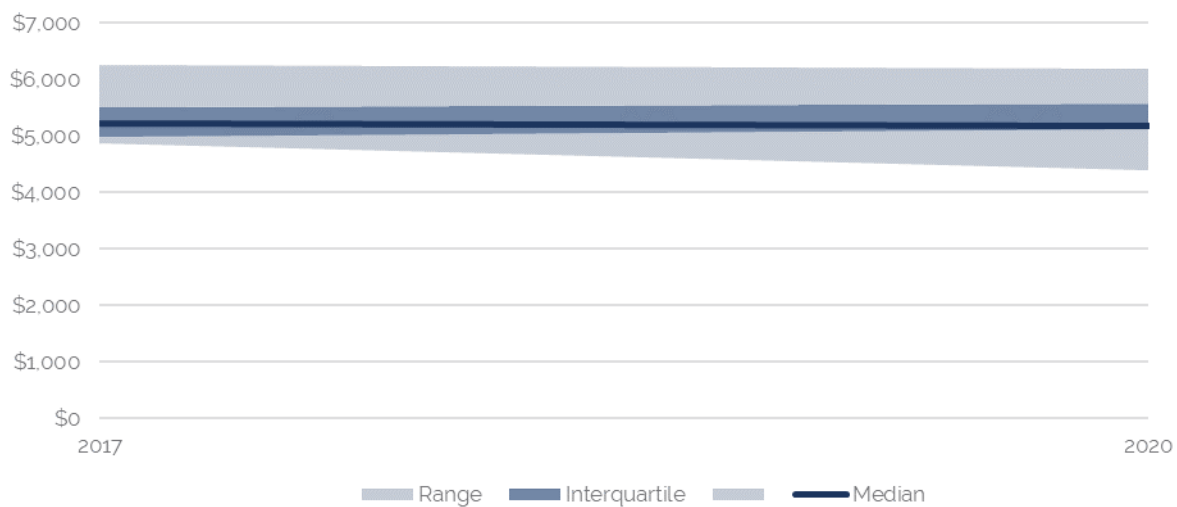
^j The prices shown are nominal, or dollars of the day. Prices are falling faster relative to the general price level which increased by around 3.3% between June 2017 and June 2020.

Figure 7 Newcastle funeral prices 2017 and 2020 (single ceremony burials)



Note: The prices are nominal and do not include burial costs.
Data source: Price data purchased from funeral price comparator website [Gathered Here](#).

Figure 8 Wollongong funeral prices 2017 and 2020 (single ceremony burials)



Note: The prices do not include burial costs.
Data source: Price data purchased from funeral price comparator website [Gathered Here](#).

We consider that competitive pressures are driving lower prices for customers in the major city markets.

The crematoria market is workably competitive

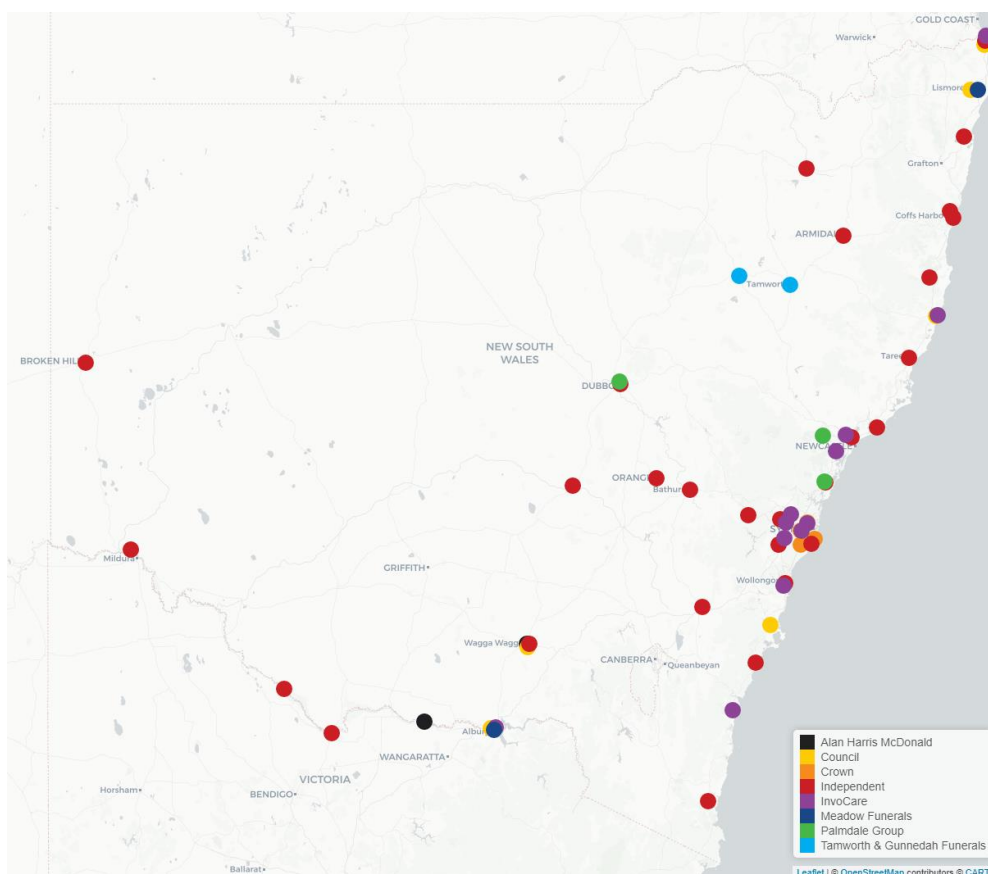
We also found that crematoria in NSW are competitive. That is, funeral providers are likely to be able to access a range of crematoria in most parts of NSW.

In 2011, the ACCC found that crematoria, like funeral providers, also have sub-metropolitan markets.¹¹ However, we found there are few barriers to funeral providers using a crematorium outside of their immediate vicinity. We consider that such barriers are only likely where:

- mourners opt to have a service at a crematorium or attend the crematorium
- where the transport costs are prohibitive (e.g. the crematorium in Broken Hill is unlikely to compete with crematoria in Mildura or Port Augusta given the large distances).

The costs of transporting a body to a different crematorium are typically low, relative to the cost of a cremation. This creates strong competitive pressures on all but the most remote crematoria in NSW. We also found there are many crematoria in NSW (Figure 9), distributed across the state with varied ownership.

Figure 9 Crematoria in NSW



Data source: IPART's analysis of funeral providers. Map created using Leaflet, with background provided by OpenStreetMap and Carto.

Our analysis found no competition concerns with vertical integration

In 2011, the ACCC considered whether InvoCare's increased vertical integration, through the acquisition of Bledisloe, would have the effect of a substantial lessening of competition.¹² A vertically integrated funeral provider could, where it has substantial market power, foreclose on its competition by:

- charging other funeral providers higher charges or limit their access to its crematoria, or
- utilising only its own cemeteries and crematoria for its funeral customers to harm the business of competing cemetery and crematoria businesses.

We consider that such abuses of market power are unlikely in NSW. We have found that funeral markets and crematoria markets in NSW are workably competitive. In none of these markets have we found that a provider has substantial market power. Therefore, there are no opportunities for a vertically integrated provider to profitably engage in this form of anti-competitive conduct.

What are the implications for the state of competition?

We consider that competition is growing in the funeral market. Some stakeholders, such as Council on the Ageing and Mills Oakley, expressed concern about large providers such as InvoCare and Propel increasing their market power (see Box 1). However, we consider that the entry of mobile funeral providers has increased the level of competition in the market, particularly for NSNA and affordable funerals. Other stakeholder submissions noted the growth in competition over recent years.

Box 1 Stakeholder submissions on competition in funeral markets

Many stakeholder submissions argued that there is effective competition or low barriers to entry in the funeral sector. For example:

- Cemeteries and Crematoria Association of NSW submitted there are no barriers to becoming a funeral director.¹³
- H. Parsons submitted that there is 'intense' competition.¹⁴
- Kenneallys Funerals identified growth of the mobile funeral provider model over the last 17 years.¹⁵
- The Australian Funeral Directors Association identified high levels of innovation in the market and competition on convenience, reputation, quality of service and price.¹⁶
- InvoCare submitted that there are 37% more funeral directors in Australia than 9 years ago.¹⁷

A smaller number of stakeholders raised concerns that competition is not effective:

- Mills Oakley considers there is not sufficient competitive pressures, with InvoCare and Propel controlling a third of the market. Mills Oakley submitted that there are few affordable funeral options.¹⁸
- W. Morrow submitted that customers do not have sufficient choice due to small geographic markets.¹⁹
- Council on the Ageing NSW submitted that there has been a contraction in the number of funeral providers in NSW over the last 20 years.²⁰
- The NSW Aboriginal Land Council (NSWALC) noted anecdotal evidence that some funeral providers increase the quoted price for a funeral when they are aware that the NSWALC is making a financial contribution (through a funeral grant to the family).²¹

NSW funeral markets are increasingly competitive

The growth of mobile funeral providers in Sydney has been supported by:

- greater supply of outsourced funeral component services, including mortuary services and transport services
- growth of affordable, targeted internet advertising reducing search costs for customers seeking funeral providers
- the Fair Trading Funeral Information Standard providing customers with greater access to price information.

Mobile operators are increasingly able to develop sustainable businesses working across metropolitan Sydney. In 2011, the ACCC found that such expansion was difficult.²² These trends are making the funeral markets more competitive and less distinct. Over time we expect this will lead to wider geographic markets, more integrated product markets and greater choice for consumers. We already see NSNA specialists competing across wide areas of NSW.

Overall we found that every funeral market is workably competitive.^k

Some issues remain that have an impact on competition

In 2011, the ACCC noted a lack of transparency of ownership. We also found that it is often difficult to identify whether a funeral provider is independent or a brand of a larger company. We consider that this may impact customers when shopping around. This reduces the competitive pressures on companies with multiple brands, as it reduces the risk for them that a customer will find a quote from a competitor. To mitigate the impact of branding, we have recommended including a disclosure of the parent company in the Funeral Information Standard.

There are also a number of consumer issues that have a meaningful impact on competition, including:

- in breach of NSW law, some funeral providers do not publish any price information
- it is difficult to compare price information published by funeral providers
- funeral providers have been found breaching consumer law:
 - InvoCare was found charging a late fee that applied to payments regardless of whether they were late.²³
 - Propel was fined for misleading local ownership claims, stating a Taree funeral home was local and independently owned.²⁴

^k Workable competition is a term to describe a market where competition and competitive pressures are effective in driving relatively efficient outcomes, such as prices reflecting costs and providing greater choice for customers. We use the term workable competition, as perfect competition is not practically possible in most markets and therefore an unachievable benchmark for analysis.

We also note that submissions identified price discrimination in the context of competition. Price discrimination is not necessarily prohibited, but may contravene Australian Competition Law or anti-discrimination laws in some circumstances.¹

Consumer issues in funeral markets are further discussed in our Consumer Issues information paper.

¹ Section 46 of the Competition and Consumer Act 2010 prevents a firm with a substantial degree of market power from engaging in conduct that has the purpose, effect or likely effect of substantially lessening competition.

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- ¹ Australian Competition and Consumer Commission, *Public Competition Assessment – InvoCare Limited – proposed acquisition of Bledisloe Group Holdings Pty Ltd*, 14 July 2011, paragraph 62.
- ² Picaluna, *About Picaluna*, accessed 7 April 2021.
- ³ Sydney Funerals, *Sydney Funerals Co. Launches into the Sydney Market*, 1 May 2020. <https://www.sydneyfunerals.com/post/sydney-funerals-co-launches-into-the-sydney-market>
- ⁴ Simplicity Funerals, *Our funeral directors Sydney, Newcastle, Central Coast and New South Wales*, accessed 7 April 2021.
- ⁵ IPART discussion with Mortuary Support Services, 26 February 2021.
- ⁶ Australian Competition and Consumer Commission, *Public Competition Assessment – InvoCare Limited – proposed acquisition of Bledisloe Group Holdings Pty Ltd*, 14 July 2011, paragraph 38.
- ⁷ Australian Competition and Consumer Commission, *Public Competition Assessment – InvoCare Limited – proposed acquisition of Bledisloe Group Holdings Pty Ltd*, 14 July 2011, paragraph 85.
- ⁸ NSW Aboriginal Land Council submission to IPART Draft Report, May 2021.
- ⁹ Australian Competition and Consumer Commission, *Public Competition Assessment – InvoCare Limited – proposed acquisition of Bledisloe Group Holdings Pty Ltd*, 14 July 2011, paragraph 57.
- ¹⁰ Australian Competition and Consumer Commission, *Public Competition Assessment – InvoCare Limited – proposed acquisition of Bledisloe Group Holdings Pty Ltd*, 14 July 2011, paragraph 58.
- ¹¹ Australian Competition and Consumer Commission, *Public Competition Assessment – InvoCare Limited – proposed acquisition of Bledisloe Group Holdings Pty Ltd*, 14 July 2011, paragraph 47.
- ¹² Australian Competition and Consumer Commission, *Public Competition Assessment – InvoCare Limited – proposed acquisition of Bledisloe Group Holdings Pty Ltd*, 14 July 2011, paragraphs 94-97.
- ¹³ Cemeteries and Crematoria Association of NSW submission to IPART Issues Paper, November 2020.
- ¹⁴ H. Parsons Funeral Directors submission to IPART Issues Paper, November 2020.
- ¹⁵ Keneally's Funerals submission to IPART Issues Paper, November 2020.
- ¹⁶ Australian Funeral Directors Association submission to IPART Issues Paper, December 2020.
- ¹⁷ InvoCare Limited submission to IPART Issues Paper, December 2020.
- ¹⁸ Mills Oakley submission to IPART Issues Paper, December 2020.
- ¹⁹ W. Morrow submission to IPART Issues Paper, November 2020.
- ²⁰ Council of the Ageing (COTA) NSW submission to IPART Issues Paper, December 2020.
- ²¹ NSW Aboriginal Land Council submission to IPART Draft Report, May 2021.
- ²² Australian Competition and Consumer Commission, *Public Competition Assessment – InvoCare Limited – proposed acquisition of Bledisloe Group Holdings Pty Ltd*, 14 July 2011, paragraphs 62-65.
- ²³ Choice, *Funeral giant invoices for late payments fees – before you're late*, 22 November 2019.
- ²⁴ Australian Competition and Consumer Commission, *Two Propel-owned funeral homes pay penalties for alleged misleading local ownership claims*, 17 March 2021.