



# AUSTRALIAN FUNERAL DIRECTORS ASSOCIATION

Interment Costs and Pricing Review  
Independent Pricing and Regulatory Tribunal  
PO Box K35  
Haymarket Post Shop NSW 1240

7 June 2019

## **Issues Paper: Review of interment costs and pricing**

On behalf of the Australian Funeral Directors Association's (AFDA) NSW/ACT Division, I would like to thank IPART for the opportunity to provide comment on the matters discussed in this Issues Paper.

### **Australian Funeral Directors Association (AFDA)**

The AFDA is the only national funeral service organisation with Member firms in every State and Territory and is widely recognised as the authoritative voice on all funeral matters. The AFDA's key objective is to optimise the funeral experience and ensure quality service delivery to the community by enhancing and promoting professional funeral standards.

AFDA Members and the AFDA Trademark represent security, care and professional service. AFDA Members are bound by a strict Code of Professional Conduct designed to meet community needs and expectations in all aspects of service delivery.

### **Comment on the Issues Paper**

As Funeral Directors we are often at the frontline of explaining interment costs to families and so offer our comments on this Issues Paper.

There are a number of points that the AFDA requests you give consideration to in finalising this investigation into interment costs and pricing.

In accordance with previous submissions made to the Health Minister, the AFDA supports the introduction of levies for the cemetery industry. In this instance, the AFDA would seek a scale of levies applicable to all operators (based on volume of business and metro/regional location) to be regulated by CCNSW. The intention being that all operators in the funeral industry would be treated equally.

Quite possibly in a more sophisticated approach, whilst the levy is attributed to the volume of cremations and bodily interments, the actual quantum might be variable to reflect other factors such as sustainability, capacity of operation, perpetual funding requirements and volumes.

The AFDA supports CCANSW in its assertions that –

- The concept of being affordable and equitable for all is fine in theory, however in reality affordability relates not only to price but also to income, tastes and individual preferences. Client families have differing perceptions of what is value for money... it is not just about price.

*Promoting*

*professional*

*funeral standards*

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- We also believe that cemetery operators are likely to need assistance with determining when their interment spaces will be exhausted, imputing future costs and the methodology for calculating perpetual maintenance.
- Operators who have considered such matters note that there are significant costs associated with related investigations. This in itself will be a costly exercise.

We note that a number of major metropolitan cemeteries have experienced significant land squeeze, these include: Eastern Suburbs Memorial Park's shortage of space; Waverley Cemetery's virtual closure; and, Woronora Memorial Park's shortage of orthodox space.

Please also refer to the below appendix for information provided by AFDA Members about minor and non-metropolitan minor cemeteries frequented and the availability of space within them.

Thank you once again for this opportunity for the AFDA to provide comment on the matters discussed in the Review of interment costs and pricing Issues Paper. The AFDA believes that further clarity regarding these issues will strengthen the effectiveness of the funeral industry and our Members' capacity to meet community expectations.

Yours sincerely

**(Ms) Dale Maroney**  
**President NSW/ACT Divisional Council**

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**Appendix**  
 Minor and non-metropolitan cemeteries

<b>CEMETERY NAME</b>	<b>AVAILABILITY OF SPACE</b>
Batemans Bay	Short on supply
Blackheath	Space for a number of years
Castlebrook	No known availability issues
Cootamundra Lawn	Reasonable space available
Emu Plains & St Marys	Full, burials available in pre-purchased plots
Forest Lawn	No known availability issues
Mt Victoria	Space for a number of years
Nangus	Reasonable space available
North Gundagai Lawn & Monumental	Reasonable space available
Penrith	30 more years capacity
Pinegrove	No known availability issues
South Gundagai	Reasonable space available
Springwood Cemetery	Potential for 25+ more years capacity
Tumblong	Reasonable space available
Wentworth Falls	Space for a number of years