



ALAN HARRIS MCDONALD
EST. 1928

The Hon. Mr Matt Kean, MP Minister for Fair Trading

Dear Minister,

I am writing regarding the consultation paper put out at the end of July suggesting regulation changes that would affect the funeral industry.

I am the CEO of a group of regional funeral homes. In New South Wales we have nine different businesses. We welcome the opportunity to comment.

When I heard about this paper I contacted my association, particularly as it says that there had been consultation with industry around the suggested policy changes. The NSW Funeral Director's Association indicated that they had not been consulted. I am very surprised by this, as we have industry associations like this to try to ensure that stakeholder interests are represented. The department could have liaised with the NSW Health Department to ascertain who have certified mortuary's and sent advice of the suggested consultation and regulations to Funeral directors.

I believe that the suggested regulation changes do not in any way represent the concerns of my community or customers. All our businesses provide several options to any family to ensure that the costs associated with a funeral service are appropriate to their budget and the service they require. We provide a written copy of the costs as a quote at the arrangement process. I have not had complaints around pricing, quotes or the cost.

People do ring and ask for pricing quotes and we provide these over the phone, or can provide a written quote for them, if they want it. However, in regional areas this is not common and we do not provide a standard basic package, other than a no service delivery only cremation.

There are already businesses out there that provide this service and will get comparative quotes for families. I don't see where there is a market failure that requires the government to step in and require independent businesses to list prices.

If this comes in I look forward to this service being extended to all competitive service industries - I have a wedding to plan in the future and would love the government to do the price check for me on venues, catering, flowers, advertising/invitations, celebrants, vehicles etc. just like a funeral director has to provide as part of their professional services in organising a funeral.

I hope you share my concerns that this proposal does not appear to be coming from any evidence base, as there have been no complaints raised with my association by Fair Trading, nor with my businesses. If there have been complaints made to Fair Trading there is no evidence in the paper about the number, the nature or the outcomes of those complaints. There appears to have been no consultation. There are lots of impacts that the regulation has not foreseen in the funeral industry, including additional costs to my doing business and increasing red tape.



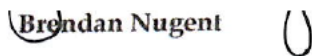
The suggested changes will not help the consumers in our regional locations at all. We are the only funeral directors in some towns, we offer a service that is tailored to our local community and affordable. Indicating prices on a website will not help the client, particularly as we service very different communities from Sikh, muslim, traditional Christian denominations and a large portion of Italian Catholics. The services offered are so different that some sort of pricing comparison won't help the customer make a choice.

Opening the door to any funeral business to quote on funerals via a price checking website just means that the local business is going to have to compete with multinationals like Invocare and Propel who will still offer to do a funeral in our home town without any of the facilities, community knowledge or local jobs.

This does not seem to have been a consultative and collaborative process and I am disappointed.

Could you please make representations on my behalf to ensure that this regulation does not proceed without engagement with stakeholders.

Yours faithfully,

 **Brendan Nugent**

Chief Executive Officer

Harris McDonald Pty Ltd

27 August 2018