

17 November 2023

Helping Consumers Make Informed Decisions for Funeral Products

- 1. The Competition and Consumer Commission of Singapore ("**CCCS**") has issued its findings for a market study into the funeral services industry in Singapore.
- 2. Conducted with the support of the National Environment Agency ("NEA")¹, the market study sought to understand the competition landscape of the funeral services industry in Singapore, the ability of consumers to make informed decisions in their purchase of funeral products², as well as assess whether there were any competition and consumer protection issues that may arise.³

Findings and recommendations

Market study did not find any competition concerns involving funeral services providers ("**FSPs**") in Singapore

3. The market study found that ample choices of FSPs exist for consumers, including for each of the larger religious groups and free thinkers in Singapore. CCCS considered the corporate and familial affiliations between FSPs and found that the market concentrations are not high. The market study did not find evidence of any anti-competitive conduct prohibited under the Competition Act 2004⁴.

Funeral pre-planning aids consumers in making informed decisions

4. For many consumers, the purchase of funeral products is a significant and unavoidable expenditure item. The market study found that consumers who considered the purchase of funeral products only when the death of their loved ones has happened or appear imminent may be vulnerable and impaired in their ability to make informed decisions. They have to come to terms with the loss as well as handle the social and emotional pressure of arranging the funeral, a process which they are unfamiliar with, and the pressure of making decisions within a short time. One way to mitigate such difficulties is through pre-planning for endof-life arrangements. This involves the timely sharing of a person's funeral wishes

¹ NEA is the lead planning agency for after-death facilities and services.

² Funeral products refer to funeral goods and services.

³ The market study involved conducting a consumer survey of 500 respondents to gain insights into people's attitudes, knowledge, and considerations towards funeral planning. Inputs from government agencies and industry stakeholders, including funeral service providers, were also obtained.

⁴ The Competition Act prohibits anti-competitive agreements, abuse of a dominant position, and mergers and acquisitions that substantially lessen competition.

with his or her loved ones, which will allow one's preferences to be taken into account when the time comes. This also facilitates the decision-making process and assists to reduce the pressure that loved ones have to face during a time of grief.

Price transparency for funeral products can be improved to help consumers

5. The market study found that consumers do not generally have a good sense of how much funeral products cost. This is because consumers are unlikely to be familiar with the associated costs of arranging a funeral, given its nature and the fact that price information is not readily available. Funeral packages can vary significantly in price depending on what a package covers. In addition, consumers may not know the final price at the time of engaging the FSPs because consumers typically are given the option to purchase add-ons, or to refuse or cancel certain items during the course of the funeral. FSPs are encouraged to provide greater transparency to consumers by adopting the following practices: (a) providing clarity on the items included in a package; (b) highlighting to consumers that the package price could be subject to change, depending on whether additional chargeable items are procured for the funeral; (c) providing a list of optional items not included in the package and their corresponding prices which consumers can refer to should they wish to make additional purchases subsequently; (d) issuing a written copy of terms and conditions to consumers; and (e) providing an invoice with sufficient details about the items provided when collecting payment.

Potential unfair practices⁵ by FSPs

- Although CCCS and the Consumers Association of Singapore ("CASE") have not received many complaints against FSPs, anecdotal feedback received during the market study suggests that some consumers may face the following practices by FSPs:
 - a. FSPs describing their products as a "one stop service" or "full package" which conveys an impression that consumers will only be required to liaise with the appointed FSP when, in fact, they may actually have to contract and liaise with multiple vendors;
 - b. FSPs not providing advance information that the final price may differ from the package price which was originally conveyed due to additional unavoidable or optional fees and charges; and
 - c. FSPs asking for payment for add-on products which the appointed decision maker did not consent to.
- 7. As set out in *CCCS Guidelines on Price Transparency*, FSPs should provide clear and accurate information to consumers regarding their products. FSPs should ensure that any unavoidable or mandatory fees are included in the total headline

⁵ An unfair practice under the Consumer Protection (Fair Trading Act) 2003 can be a misleading representation or false claim made by a supplier.

price. Any optional fees or charges should also be set out clearly. FSPs should obtain agreement from the appointed decision maker for the funeral arrangement regarding the purchase of any additional products, so as to reduce misunderstandings involving unsolicited products.

8. Consumers may approach CASE if they encounter disputes with FSPs or face unfair practices.

Consumer Protection Tips and Checklist

- 9. To help consumers make informed decisions on funeral products, CCCS has developed an "A.S.K. a FSP checklist" annexed to this media release to encourage consumers to pre-plan funeral arrangements and to ask the right questions when consulting with a FSP. The checklist provides useful references for consumers, such as the My Legacy portal⁶, which allows users to explore, store and share one's end-of-life plans.
- 10. The checklist can be accessed via CCCS's website, NEA's website⁷ and the 'My Legacy' portal. It will also be distributed at important touchpoints such as selected care facilities.
- 11. The market study report is available on CCCS's website here.

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⁷ https://www.nea.gov.sg/our-services/after-death/post-death-matters/arranging-a-funeral

⁶ 'My Legacy' is part of the government's 'LifeSG' initiative which helps the public to explore, store and share their end-of-life plans. On funeral planning, the website provides information on how to choose an FSP, and the decisions that have to be made, and a digital vault for consumers to plan, store and share their legal, healthcare and estate matters.

About the Competition and Consumer Commission of Singapore

The Competition and Consumer Commission of Singapore ("**CCCS**") is a statutory board of the Ministry of Trade and Industry. CCCS administers and enforces the Competition Act 2004 which empowers CCCS to investigate and adjudicate anticompetitive activities, issue directions to stop and/or prevent anti-competitive activities and impose financial penalties. CCCS is also the administering agency of the Consumer Protection (Fair Trading) Act 2003 or CPFTA which protects consumers against unfair trade practices in Singapore. Our mission is to make markets work well to create opportunities and choices for businesses and consumers in Singapore. For more information, please visit <u>www.cccs.gov.sg</u>.

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