



# AUSTRALIAN FUNERAL DIRECTORS ASSOCIATION

16 July 2020

The Hon Jenny Mikakos, MP  
Member for Northern Metropolitan Region  
Minister for Health  
Minister for Ambulance Services  
Minister for the Coordination of Health and Human Services COVID-19  
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## Victorian DHHS funeral inconsistencies

Dear Minister,

The Australian Funeral Directors Association (AFDA) is the peak funeral industry body in Australia with members in each State and Territory, representing around 65% of all deaths in the country.

On Monday 13 July 2020 our member funeral director wrote to your Department seeking direction as to whether the Department's previously stated position allowing funerals to be conducted over more than one session applied equally to the 'viewing' component of a funeral. Our member received a response from the Department on 15 July 2020 (see covering email) containing a number of revelations, namely:

"In your email you have quoted text from previously received [DHHS] correspondence that indicated funerals may be held over two sessions as a way of accommodating more than 10 mourners. This approach is still permissible where more than 10 mourners wish to attend. However, viewings of deceased are not part of a funeral. Wakes are also not part of a funeral. A funeral must have a service that runs for a specified time and have the features commonly associated with a funeral service. Viewings are categorised as gatherings and, if held in a Restricted Area are subject to the gathering restriction of the *Stay at Home Directions (Restricted Areas) (No 2)*. These strict requirements are necessary to ensure people only gather when it is absolutely necessary, for a limited time and with a defined group of people." (Underlining added.)

It would appear the position of the Department is:

- The Victorian government considers that more than 10 people may attend a funeral by expressly permitting a funeral to be held over two sessions in order to accommodate more than 10 mourners.
- The Victorian government considers that viewing the deceased is not part of a funeral as viewing is not commonly associated with a funeral service.
- The Victorian government considers that wakes are not part of a funeral.

Promoting  
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### **Wakes inconsistency**

If the Victorian government considers wakes are not part of a funeral, why have Victoria's two major public cemetery trusts (The Greater Metropolitan Cemeteries Trust and Southern Metropolitan Cemeteries Trust) regulated by your Department each been granted permission to provide wakes? AFDA does not take issue with a funeral wake being limited to 10 attendees but considers it to be inconsistent, if not anti-competitive, for the government to allow two major public cemeteries the ability to hold wakes but not funeral directors. Further, why would public cemeteries be allowed to hold wakes but 10 family members not be able to attend a viewing of their loved one?

### **Viewings are part of a funeral**

The suggestion that 'viewings of deceased are not part of a funeral' is ludicrous and unduly harsh on family who have suffered the greatest loss that can be suffered. When someone dies it's as hard as it gets for those left behind. Consider the many relatives who have not been able to visit aged care facilities for weeks leading up to a death. Consider the wives of husbands with flu-like symptoms who have not been able to visit their husbands in hospital before they died, just in case they had COVID-19. But they didn't. These families have sometimes gone weeks without seeing their relative before they died. To deny a viewing on an artificial and false premise that it is not part of the funeral process is misinformed and cruel.

To allow a funeral service to be conducted over two separate sessions with a total of 20 people, but disallow a viewing of 10 people who are the same 10 who attend a burial or cremation service is inconsistent and defies logic. There is less risk of the spread of the virus when the viewing and burial/cremation service have a total of 10 people than allowing 20 to attend a funeral through two sessions. For some families the viewing is the only part of a funeral which is held.

The attached Australian Government Department of Health COVID-19 Advice for Funeral Directors clearly contemplates that 'body viewing' is part of a funeral and should be allowed: "Family members should be allowed to view the body and standard precautions should be observed." The blanket ban on viewings will have profound and disturbing mental health implications for affected families, which in turn will create significant consequences for State healthcare.

### **Need for clarity**

To be clear, the AFDA is not advocating for multiple rotating sessions for each aspect of a funeral (viewing/ceremony/burial/cremation/wake). On behalf of our members and grieving families we simply seek clarity. If government is going to allow two sessions per funeral does the same apply to viewings? Alternatively, is each separate aspect of the funeral process (for example viewing/Church/cemetery) limited to 10 people per aspect?

### **Suggestion for stakeholder engagement**

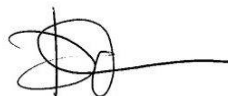
Being a national body, AFDA experiences the range of approaches to industry engagement from each State government. AFDA would welcome a contact point either from the Minister's Office or from your Department to provide any assistance which we may be able to offer. By way of example, yesterday three NSW Ministers met directly with our National and State Presidents for industry discussions.

Please do not hesitate to contact AFDA if any of the above points require further elucidation.

Yours faithfully,



Andrew Pinder  
National President



Dale Gilson  
Chief Executive Officer

CC: Premier Mr Dan Andrews MP