



AUSTRALIAN  
FUNERAL  
DIRECTORS  
ASSOCIATION

Australian Funeral Directors  
Association Limited  
Level 1, 700 High Street  
(PO Box 291)  
KEW EAST VIC 3102

The Hon. Stephen Wade  
SA Minister for Health  
ministerforhealth@sa.gov.au

6 August 2021

Dear Minister

### **SA COVID-19 – Funeral attendance cap inconsistency – funeral homes and licensed venues**

The Australian Funeral Directors Association (AFDA) is the national peak body with members in every State and Territory representing approximately 65% of all deaths in Australia.

I wish to bring to your attention and seek clarity regarding the intent of the recent capped numbers at funerals in conjunction with the density limits at licensed venues.

With the current cap of 50 attendees at a funeral, AFDA members are experiencing an increase in requests from families to conduct funerals in licenced venues due to the restrictions on numbers at all other venues. The capacity of licenced venues is capped by the venue size density limits, and not by the specific event being held there, such as a funeral.

AFDA members have done an incredible job to keep families safe during the COVID-19 pandemic, however funeral directors are not gatekeepers and are now being placed in the position where they must advise families that there is a cap of 50 at funerals, but families know that they can have hundreds at large clubs, and are insisting on this.

This is causing confusion for funeral directors, grieving families and mourners who are phoning to ask about funeral numbers at different venues. The current direction has created an inconsistency depending upon the location of the funeral service. A licenced venue that wishes to host a funeral does not have the same restriction as other locations.

If capping numbers at funerals is a risk-based decision, designed to reduce the spread of COVID-19, then open-air funeral services at cemeteries, parks and gardens should be considered the lowest risk. This would allow additional numbers to attend, however the largest numbers are being allowed in enclosed spaces which hold a liquor licence.

AFDA requests the following:

- **Clarify that funerals are capped at 50 irrespective of the venue used;**
- **If funerals are not capped at 50 for licenced venues, then funeral homes and other venues are allowed to accommodate funerals based on density limits of the venue and are not restricted to 50.**

I look forward to your earliest response so AFDA can provide clarity and direction to our members as soon as possible.

Yours sincerely

A handwritten signature in black ink that reads "Lawlor". The signature is written in a cursive style with a large, stylized 'L' at the beginning.

**David Lawlor**  
SA/NT Divisional President