



6 October 2021

The Hon. Martin Foley  
Minister for Health  
Level 22/50 Lonsdale Street  
MELBOURNE, VIC 3000

Via email: [minister.health@health.vic.gov.au](mailto:minister.health@health.vic.gov.au)

**Requirements and considerations for the Funeral Industry under upcoming Phase B of Victoria's Roadmap to deliver the National Plan.**

Dear Minister Foley,

On behalf of the Australian Funeral Directors Association (AFDA) and Victorian Funeral Director Member Firms, I am writing to seek urgent clarification on what requirements Victorian Funeral Directors will need to follow in order to ensure effective compliance from 26 October 2021 with Phase B of Victoria's Roadmap to deliver the National Plan.

The Australian Funeral Directors Association (AFDA) is a national peak industry body with Member firms in every State and Territory representing approximately 60% of all deaths in Australia and is widely recognised as the authoritative voice on all funeral matters. Our key objective is to optimise the funeral experience and ensure quality service for the community by enhancing and promoting professional funeral standards.

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

Since Sunday 19 September 2021 when the Premier of Victoria, The Hon Daniel Andrews MP, announced Victoria's Roadmap to Deliver the National Plan a considerable number of AFDA Member firms in Victoria have posed questions and concerns regarding how they can ensure funerals are arranged and executed in compliance with the following restrictions which are effective indicatively from 26 October 2021 when 70 per cent of Victorian's are expected to have received two COVID-19 vaccination doses:

- Metropolitan Melbourne indoor funerals capped at 20 attendees if fully vaccinated (one person per 4 sqm)
- Metropolitan Melbourne outdoor funerals capped at 50 attendees if fully vaccinated (one person per 4 sqm)

*Promoting*

*professional*

*funeral standards*

- Metropolitan Melbourne indoor and outdoor funerals capped at 20 attendees if vaccination status is unknown (one person per 4 sqm)
- Regional Victoria indoor funerals capped at 30 attendees if fully vaccinated (one person per 4 sqm)
- Regional Victoria outdoor funerals capped at 100 attendees if fully vaccinated (one person per 2 sqm)
- Regional Victoria indoor and outdoor funerals capped at 20 attendees if vaccination status is unknown (one person per 4 sqm)

Our industry is seeking clarification and direction as to what method will be in place to confirm double vaccination status and what non-digital methods will be accepted should funeral mourners not have a mobile phone with the Victoria Services App where it is understood that vaccination status will be integrated into.

The industry also requires clarification as to how they enforce these new regulations and subsequently need confirmation of what legal rights they will have under the Chief Health Officer's mandate, to refuse entry to mourners unable to present evidence of their vaccination status. In order to minimise difficult situations arising between funeral staff and mourners due to misunderstandings of these rights, it is also essential that our industry is informed as to the rights of the individual mourners should they seek to gain entry at a funeral when they are only single dose vaccinated or have a medical exemption. If an individual has a medical exemption, is the funeral cap maintained at the fully vaccinated attendee cap or the unvaccinated attendee cap?

Under Phase B, will funeral staff have the right to request identification of individual mourners to confirm their vaccination status evidence is matched to the attendee and not belonging to someone else?

If the funeral is to take place at a venue not under the Funeral Directors ownership or management, who is responsible for checking and confirming vaccination status – the funeral staff or the venue staff?

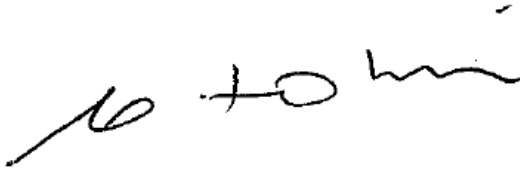
Under the Chief Health Officer's new mandate announced 1 October 2021, funerary workers will be required to have their second COVID-19 vaccine dose by Friday 26 November 2021 which is a full month after the indicative Phase B date when the above regulations will be in place. How will these new regulations be impacted should a staff member at a funeral not yet be twice vaccinated during this month? Will the funeral attendee cap be reduced to the unvaccinated attendee funeral cap or remain at the fully vaccinated attendee cap?

The industry is aware that trials are scheduled to commence from 11 October 2021 to test the most suitable system and methods for ensuring business and staff can effectively comply with the new regulations, however the funeral industry requests that if the above questions are not yet answerable, that these questions are at the very least taken into consideration with the greatest priority before and once these trials are underway.

We appreciate your time once again to provide the funeral industry with the clarity and direction required to operate efficiently during these very difficult times for our Member firms, and the families who have lost a loved one.

Please direct any correspondence in relation to this matter to Sherida Good via email at the AFDA National Office on [sherida.good@afda.org.au](mailto:sherida.good@afda.org.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Cathy Tobin'. The signature is written in a cursive style with a large initial 'C' and a long horizontal flourish at the end.

Cathy Tobin  
President, AFDA Victorian Divisional Council