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Subject Columbarium Consultation Paper

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## Columbarium Concern Group

29<sup>th</sup> March 2012

Food Branch, Food and Health Bureau  
17/Floor, East Wing  
Central Government Office  
2 Tim Mei Avenue  
Tamar Hong Kong

Dear Sirs

### **2<sup>nd</sup> Public Consultation on Licensing Scheme for Private Columbaria**

We refer to the above Consultation and would like to make suggestion as the followings:

#### **Background Reasons for Suggestions**

1. Columbarium is a lucrative business with a high degree of real estate element/involvement.
2. Conventional property developer does not wish to touch the business of death.
3. Due to the condensed population environment, having a columbarium in new town and rural area will encounter opposition from villagers and powerful group, such as the Rural Committee etc etc.
4. As reported by media and magazine, most of the columbarium in rural and NT area are controlled and/or invested by triad members. Often, as reported lately in media, Rural Committee Members are closely linked to triad members.

5. Due to huge cash flow of the business, money laundering can be easily arranged without being noticed.

### **Suggestions**

We suggest the followings:

6. Authority shall include background checking for investors and operators of the new and old columbarium application for License and its renewal. This is to make sure there is no triad member at the back scene of the said operations and enhanced consumer protections.

7. Authority shall have the right to trace fund source for each of the columbarium operations/investments to make sure money are derived from proper and legitimate source.

8. Criminal liabilities shall be imposed to offenders/operators and their accomplice in violation of the proposed Practice Code in line with the prevailing criminal law system.

9. Right for Authorities to make periodic on spot checking for fund flow and patron list shall be included in the Licensing approval.

Thank you.

### ***Columbarium Concern Group***



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