

Cemeteries & Crematoria

ASSOCIATION OF NEW SOUTH WALES

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5 September 2005

Ms Susan Want
Acting Director
Standing Committee on Social Issues
Legislative Council
Parliament House
Macquarie Street
SYDNEY 2000

SOCIAL ISSUES COMMITTEE

7 SEP 2005

RECEIVED

Dear Ms Want

RE: Inquiry into Funeral Industry

Please find attached information as requested at the Hearing on 8 August, 2005. Also, we have included some information that may be of assistance to the Committee during their deliberations.

Inclusions being:-

- Attachment "A" Cemetery and Crematoria Fees
- Attachment "B" Glenmorus Gardens Fees – Albury City Council
- Attachment "C" Penrith City Council Fees
- Attachment "D" Woronora General Cemetery & Crematorium Trust Fees
- Attachment "E" Information covering Cardboard Coffins, Do It Yourself Funerals, Competition, Basic Funeral and Mortuary Registration and Holding Rooms, Licensing, Alternative Burials and Regulatory Changes.
- Attachment "F" Guideline 'The Use of Cardboard & Other Receptacles'
- Attachment "G" Guideline 'Establishment of New Crematoria'
- Attachment "H" Guideline 'Establishment of a Cemetery'
- Attachment "I" Guideline 'Environmental Guidelines for Crematoria and Cremators
- Attachment "J" Response to stakeholder discussion paper: Burial Space in the Sydney Greater Metropolitan Area

If you require further information, please do not hesitate to be in contact.

Yours faithfully



Mary Thorne
President

Attachments



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CEMETERY AND CREMATORIA FEES

Public Trust Cemeteries and Crematoria are required to advise the Department of Lands of any changes to fees and charges, they are also required to display them at their establishments.

The private crematorium at Rookwood must provide its fees and charges to the Department of Lands. The procedure at most other private cemeteries and crematoria is self-regulation and setting of fees as applicable from time to time.

Each year local government goes through a public consultative process regarding fees for their cemeteries and crematoria.

There are several factors that impact on prices at different cemeteries.

Diverse infrastructure costs, location, availability of land, types of ground e.g. rocky, sandy, high water table etc. Provision for maintenance and future upkeep. *Woronora 2005 includes \$250.00 to compensate for extra cost to dig in rock areas.*

There is a price difference between private, local government and trust cemeteries. City and country differ. Most cemeteries in country areas are in the care of local government with traditionally much lower charges and subsidised by ratepayers.

Penrith's 1995 cost base was low and unsustainable in terms of both service delivery and effective use of public funds for cemetery maintenance. Their targeted cost increases since 1995 have resulted in an increased capacity to reinvest funds into maintenance and general service improvements, to provide services previously lacking or non-existent.

Cemeteries with a direct connection to cremation facilities may also offset any real costs in operating a burial ground with income and activity derived from their cremation facility. Those without access to such facility options currently rely on the traditional burial and interment activity and income stream. This has dwindled over the last 50 years.

LOCAL GOVT		1995	2000 (GST)	2005 (GST)
Lismore Memorial Gardens	Lawn	\$1075	\$1520	\$1950
	2 nd Interment	\$775	\$1050	\$1650
Waverley	Lawn	\$4500	\$6050	\$9900
	2 nd Interment	\$725 - \$1025	\$970-\$1155	\$1375 - \$1485
Manning Great Lakes	Lawn (includes plaque)		\$1050	\$1350 (double depth \$1550)
	Reopen (double depth)			\$650
Cessnock City Council	Lawn (includes plaque)	\$1280	\$1760	\$2255
	2 nd Interment		\$880	\$1155
Oberon Council	Lawn (includes plaque)		\$1320	\$1570
Greater Argyle (Goulburn)	Lawn	\$1300	\$1650	\$1650
Baulkham Hills Shire Council	Lawn (G'dig not included responsibility of funeral director)	\$700	\$880	\$1540
	2 nd Interment (admin fee only)	\$200	\$275	\$400
Penrith City Council	Lawn site only	\$450	\$550	\$990
	Interment (contractor gravedigger)	\$625	\$755	\$1175
Dubbo City Council	Lawn	\$610	\$1111	\$1815
Wollongong City Council	Lawn	\$920	\$1,340	\$1,614
Hawkesbury City Council	Lawn	\$960 (includes interment & plaque)	\$550 (plot only)	\$1,590 (includes interment, plaque & perpetual maintenance)
Hastings Council	Lawn	\$750 (includes interment)	\$520 (site only)	\$1202 (includes interment)

		1995	2000 (GST)	2005 (GST)
TRUST				
Liverpool Presbyterian Trust	Lawn		\$3080 (includes plaque)	\$3,795
Macquarie Park	Lawn	\$2,895.00	\$4,120	\$5,810
Rookwood Independent	Lawn	\$1605 (includes headstone or plaque)	\$2300 (includes headstone or plaque)	\$3585 (includes headstone or plaque)
Rookwood Anglican	Lawn	\$1534	\$3619	\$4264
Woronora	Lawn	\$1430 (includes plaque & interment fee)		\$3465 (includes plaque & interment fee)
Local Government				
	CREMATION FEES	1995	2000 (GST)	2005 (GST)
Hastings Council		\$450	\$583	\$715.00
Wollongong Council		\$400	\$475	\$520
Lismore Memorial Gdns		\$450	\$510	\$704

Trust			March 1996 (ex GST)	May 2005 (ex GST)
Woronora			\$475	\$776
Eastern Suburbs			\$495	\$726
Macquarie Park				\$770
Private				
Castlebrook			\$485	\$781
Forestlawn			\$530	\$781
Northern Suburbs			\$498	\$698
Pinegrove			\$530	\$781
Rookwood			\$550	\$748

ATTACHMENT "B"

(Email and price list from Glenmorus Gardens – Albury City Council)

Subject: AlburyCity - Glenmorus Gardens fees
Date: Tue, 9 Aug 2005 11:28:29 +1000
From: Dale Blampied <dblampied@alburycity.nsw.gov.au>
To: <ivan@woronoracemetery.org.au>

Ivan

As discussed please find below some details regarding Glenmorus Gardens fees and charges. I am happy for this information to be in the public arena. If you require any additional information please do not hesitate to contact me on (02) 6023 8233.

Regards

Dale Blampied.

Glenmorus Gardens Fees and Charges

The general premise is to ensure that we continue to provide an affordable "entry" level for the community with respect to burial sites.

However, we also wanted to provide greater choice for the community by developing "prestige" options. For this reason we are looking to develop specific sites within Glenmorus Gardens, with varying levels of headstone, that have premium prices. It then becomes a matter of choice for the customer.

The other major change that we have made relates to double depth graves. Traditionally, a client would pay for the first interment immediately with the cost of the second interment occurring when take up occurs.

This resulted in most clients taking up double depth graves whether or not there was any view to use the double depth position. The ultimate situation could arise whereby double depth graves became unnecessarily limited in availability.

The revised situation requires that effectively both interments are paid for in the first instance and a minimal (\$300) reopening fee is paid at the time of the second interment. In real terms this is no more expensive than the previous arrangement. It alters the timing of payment not the quantum.

It also provides certainty of cost to clients. The reopening fee will be linked to CPI to create greater certainty.

A summary of fees and charges is provided for information.

Glenmorus Gardens

Fees and Charges at Glenmorus Gardens can generally be placed into three (3) categories:

- Interments
- Memorials; and
- Cremations.

Interments

Fees for Interments for 2005/06 have been structured around the introduction of new products including Beam Plaque and Memorial areas in addition to the standard Lawn Interments.

The new products will allow a greater level of choice and prices allow for differentiation between products and have been determined taking into account advice received during the recent consultancy to produce a site development plan.

Additionally, rather than selling double sites on the basis of paying for a first Interment and second Interment, sites are proposed to be sold on the basis of Double Depth and Single Depth.

When the second Interment is taken up an 'Opening Fee' of \$300 would be charged.

Memorials

The cost of memorialisations have been increased between 3% and 13% to better reflect the cost associated with the provision and maintenance of the particular product.

Cremations

Approximately 4.5% (3% and 1.5%) of cremations undertaken fall into the 'up to 5 years' and '5 to 12 years' categories respectively. Due to the low numbers of services undertaken, the heightened emotional distress generally encountered in these circumstances and significantly lower costs of some other service providers it is proposed that cremations in the:

- up to 5 years old category reduce from \$300 to \$100; and
- 5 to 12 years category reduce from \$500 to \$300.

It is proposed that all other cremations increase from \$650 to \$700.

Glenmorus Gardens Charges

	2004/05	2005/06
	\$	\$
Burial Charges		
Lawn		
Double Depth (1 st Interment)	2,000.00	3,400.00
Single Depth	1,900.00	2,000.00
<u>Prestige Positions</u>		
Double Depth	-	4,200.00
Single Depth	-	2,500.00
Beam Plaque		
Double Depth	-	4,600.00
Single Depth	-	2,800.00
<u>Prestige Positions</u>		
Double Depth	-	5,000.00
Single Depth	-	3,000.00
Beam Memorial		
Double Depth	-	6,000.00
Single Depth	-	3,300.00
<u>Prestige Positions</u>		
Double Depth	-	8,000.00
Single Depth	-	4,400.00
Opening fee for second interment		300.00
Memorials		
Niche	470.00	700.00
Gardens	725.00	900.00
Individual Rose/Shrub	975.00	1,200.00
Monuments	750.00	775.00
Tree	1,400.00	1,500.00
Scattered	36.00	40.00
Ashes Interred in Existing Grave	180.00	190.00
Prestige Family Plot (from)	-	5,500.00

Glenmorris Gardens Charges (continued)

	2004/05	2005/06
	\$	\$
Cremations		
Adult	650.00	700.00
Children (aged 5-12)	500.00	300.00
Stillborn/Infants (0-5 years)	300.00	100.00
 Lawn Cemetery		
Babies	770.00	770.00
Grave for Ashes	600.00	600.00

ATTACHMENT "C"

Penrith City Council

Penrith, St Marys & Emu Plains Cemetery Fees and Charges as at 1 July, 2005

LAWN (beam monument) Penrith - Lawn 4 (General), Catholic Lawn 1 & 2; St Marys – Lawn 2 Burial site (1.1m x 2.4m) double depth	<i>(includes 10% GST)</i> \$990.00
LAWN (beam with plaque) Penrith - Lawn 3 Burial Site (1.1m x 2.4m) double depth 380 x 215mm sculptured plaque & installation	<i>(includes 10% GST)</i> \$990.00 \$550.00
MONUMENTAL Penrith, St Marys & Emu Plains (0.9m x 2.4m) double depth	<i>(includes 10% GST)</i> \$990.00
GRAVEDIGGING – LAWN AND MONUMENTAL Monday to Friday Saturday (before 12.00 pm) Slab removed and replaced Placement of Ashes by gravedigger	<i>(includes 10% GST)</i> \$1015.00 \$1015.00 \$275.00 \$275.00
PERMIT/REGISTRATION FEE - Monumental, Lawn, Columbarium 1 st or 2 ND Interment Burial Permit/Registration <small>N.B. Permit fee is waived for burial of baby or child under 15 years</small> Ashes placed in a grave, garden or niche Permit/Registration Headstone/Monument Permit Monument repairs/alterations Permit	<i>(GST exempt)</i> \$165.00 \$165.00 \$125.00 \$50.00
EXHUMATION (Administration Fee only – includes 10% GST)	\$570.00
COLUMBARIUM 1 & COLUMBARIUM 2 - Penrith Niche Niche, plaque, installation & permit Niche, plaque with vase, installation & permit (Plaque 220 x 200mm)	<i>(includes 10% GST)</i> \$495.00 \$935.00 \$1045.00
ASHES GARDEN 1 – Penrith Single site Site, plaque, installation & permit (Plaque 145 x 127mm)	<i>(includes 10% GST)</i> \$440.00 \$825.00
FAMILY BOULDER, ASHES GARDEN 1 – Penrith Includes 6 sites and family name plaque Plinth, plaque, installation & permit (Plaque 145 x 127mm)	<i>(includes 10% GST)</i> \$2,310.00 \$385.00

Please Note: Plaque costs may be increased at the beginning of each calendar year (manufacturer).

ATTACHMENT "D"

WORONORA GENERAL CEMETERY & CREMATORIUM TRUST

PRICES EFFECTIVE FROM 1st JULY 2005

LAWN GRAVE

Lawn Grave Right of Burial	\$2,120.00
Monumental Beam Lawn Right of Burial	\$3,310.00

LAWN INTERMENTS

Lawn Open & Re-Open	\$1,450.00
Monumental Beam Lawn Open & Re-open	\$1,135.00

MONUMENTAL GRAVE

Monumental Right of Burial	\$1,860.00
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MONUMENTAL GRAVE INTERMENTS

Monumental Grave Open & Re-open	\$1,135.00
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CRYPTS

Single	From \$10,085.00 to \$22,265.00
Tandem	From \$22,265.00 to \$27,230.00
Companion	From \$19,430.00 to \$41,500.00

CRYPT ENTOMBMENTS

Crypt Open	\$1,325.00
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CHILDREN & STILLBORN BURIALS

Stillborn Burial	\$285.00
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ABOVE GROUND ENTOMBMENTS

Tomb Section Open	\$625.00
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INTERMENT OF ASHES

Ashes Interred in Grave	\$295.00
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EXTRAS

Extra Line on Lawn Plaque	\$40.00
Two Extra Lines on Plaque	\$80.00
Emblem	\$80.00
Photo 5cm X 7cm	\$310.00
Photo 7cm X 9cm	\$375.00

CARE SERVICES

Annual Care Single	\$100.00
Annual Care Double	\$160.00
Annual Care Triple	\$185.50
Perpetual Care Single	\$4,530.00
Perpetual Care Double	\$5,100.00
Perpetual Care Triple	\$5,325.00
Soil & Turf Single	\$170.00
Soil & Turf Double	\$330.00
Soil & Turf Triple	\$475.00

CREMATIONS

Cremation to 1 Year - Full Service	\$140.00
Cremation to 12 Years - Full Service	\$350.00
Cremation - Full Service	\$780.00
Cremation - Committal	\$780.00

BEAM - EVERGREEN

Henry Kendall	
- Evergreen Shrub Garden	\$560.00
Plaque & Placement	\$305.00

GARDEN WALKS

Centenary Court - Garden Walk	\$510.00
Henry Lawson - Garden Walk	\$510.00
Plaque & Placement	\$305.00

TRADITIONAL SHRUB

Evergreen Shrub Garden	\$510.00
Plaque & Placement	\$305.00

FAMILY BUSH ROCK

Henry Lawson - Bush Rock Family	POA
Mary Gilmore - Bush Rock Family	POA

FAMILY ESTATE

Mary Gilmore - Family Estate	POA
Gazebo - Family Estate	\$6,910.00
Plaque & Placement	\$660.00

MEMORIALS ONLY (ASHES SCATTERED OR COLLECTED)

Gazebo Memorial	\$905.00
Henry Kendall - Garden Walk	\$460.00
Plaque & Placement	\$305.00

Remembrance Plaque Memorial (inclusive)	\$285.00
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ROCKERIES

Rockery Garden	\$510.00
Plaque & Placement	\$305.00

BUSH ROCKS GENERAL

Henry Lawson - Bush Rock General	\$735.00
Plaque & Placement	\$305.00

BEAM-ROSES

Centenary Court - Rose Garden	\$1,620.00
Gazebo - Rose Garden	\$1,925.00
Plaque & Placement	\$660.00

Henry Kendall - Rose Garden	\$850.00
Plaque & Placement	\$305.00

GRANITE WALLS

Mary Gilmore - Memorial Wall	from \$530.00
Plaque & Placement	\$305.00

Gazebo Niche	\$1,925.00
Plaque & Placement	\$660.00

BRONZE WALLS

Centenary Court - Memorial Wall Inside Panel from	\$670.00
Centenary Court - Memorial Wall Outside Panel from	\$555.00
Henry Lawson - Memorial Wall	\$395.00
Plaque & Placement	\$305.00

FAMILY MARKER

Henry Lawson - Family Marker	\$270.00
Mary Gilmore - Family Marker	\$270.00
Gazebo - Family Marker	\$270.00

PLAQUE EXTRAS

Emblems	\$80.00
Flower Holder	\$70.00
Photo - 3cm X 4 cm	\$310.00

BOOK OF REMEMBRANCE

Centenary Court

CC - 2 Line Memorial	\$190.00
CC - 5 Line Memorial	\$250.00
CC - 8 Line Memorial	\$310.00
CC - 5 Line Memorial + Motif	\$340.00
CC - 8 Line Memorial + Motif	\$395.00

Court of Remembrance

COR - 3 Line Entry	\$140.00
COR - 4 Line Entry	\$165.00
COR - 5 Line Entry	\$200.00

URNS

Ceramic Urns	
- Candle Holder	\$25.00
- Mini	\$80.00
- Small	\$170.00
- Medium	\$225.00
- Large	\$285.00

Bronze Urns	POA
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ASH DISPOSITION

Collection	No Charge
Ashes Posted	\$100.00
Scattered	\$80.00
Uplift Ashes from Garden	\$145.00
Uplift Ashes from Wall	\$115.00
Transfer Ashes	\$115.00

MISCELLANEOUS SERVICES

Family Attendance at Disposition	\$125.00
Ashes Storage (per month)	\$12.00
Memorial Service 1/2 Hour (West Chapel)	\$115.00
Extra Time in Chapel per 1/2 Hour	\$90.00

RECORDS

Search Records - Details Provided	\$25.00
Search Records - No Details Provided	\$40.00
Transfer of Title from G'tee to G'tee	\$60.00
Transfer Title of Position or Plot	\$60.00

CARDBOARD and HANDMADE COFFINS

Cardboard Coffins have been offered to the industry for some years. The main issue is occupational health and safety. Another issue is the effect a cardboard coffin would have on the performance of the cremators i.e. would the combustibility be affected? The industry is aware through experience as to how traditional coffins react.

Will they stand up to the rigours of carrying and lowering? Will crematorium charging equipment damage the coffin?

If damage occurs will staff be exposed to bodies and body fluids coming out of the coffin? This is of great concern when linked to a "DIY funeral".

Who will manage the added and unnecessary trauma to family and mourners?

The Cemeteries and Crematoria Association of NSW (CCANSW) was advised by the Funeral Industry Council (FIC) that cardboard coffins were to be tested but the company involved was somewhat reluctant to present the product for testing. On 18 January 2005 CCANSW was advised by the FIC that they have given no objections for the use of a cardboard coffin within the funeral industry manufactured by Apogee International. FIC also advised that an Apogee coffin had been tested by TestSafe Australia and meets the minimal standard specifications set by this authority.

The CCA addresses the following questions on their web site and this is available to the general public:

1. **Can I make my own coffin?** Yes. Prior to making a coffin, you will need to ensure that the funeral director and the cemetery or crematorium will accept your coffin. Due to OHS requirements, most funeral directors and cemeteries or crematoria will only accept coffins that have been tested and are made by a reputable coffin manufacturer. Check with your funeral director and cemetery or crematorium before you make this decision.
2. **Can I use a cardboard coffin?** CCANSW does not object to the use of cardboard coffins. The use of cardboard coffins is not illegal in New South Wales but all products need to meet appropriate safety standards. It is recommended that, prior to purchasing a cardboard coffin, you check with your chosen Funeral Director and Cemetery and/or Crematorium to ensure that they will accept your coffin.

DO IT YOURSELF FUNERALS

Questions that need to be asked are: Who does the body preparation prior to the funeral? Who ensures that it is prepared properly? Will it be safe?

With DIY funerals without the use of professional funeral directors and staff there are a few scenarios that will cause considerable impact and upset to a funeral and commemoration.

For example: Upon arrival at the cemetery/crematorium from a "DIY funeral" if the paperwork is incorrect, incomplete, etc and the cemetery or crematorium cannot complete the service at that time, what happens to the body? Where will the coffin and body be stored until all is in order and the service can be finalised with the coffin and body cremated or buried?

If the body is not cremated or buried for several days after death who holds the body? Are all hospital mortuaries geared for this? If hospital mortuaries are to be used what sort of burden will it impose on the hospitals?

Without a suitable vehicle (hearse) how will the coffin and body be transported in a dignified way? Is it proposed to have any private vehicle from hatchback to table-top arrive at a cemetery or crematorium for the ceremonial committal? What affect will this have on the rights and rituals of other cemetery users, and the public in general?

Who is responsible for control and safety of participants and mourners at a DIY funeral? Funeral Directors generally look after this important area of the ritual.

With family members carrying and lowering the likelihood of accidents is increased.

The cemetery or crematorium is required to provide a risk free environment. With untrained people participating where does the responsibility lie? Is it expected that the cemetery or crematorium may need to employ extra staff to receive the body to compensate for the absence of trained funeral directors?

Will cemetery and crematorium charges have to be higher to cover contingencies like slow or part payments or bad debts that are areas currently looked after by the financial stability of funeral directors.

COMPETITION

Cremation, after its introduction early last century, has gained in popularity and for the last few decades more deceased are cremated than buried.

In country areas cemeteries are generally under the control of local government. Charges for burial in these locations have been traditionally quite low (subsidised by rate payers and with no perceived shortage of land) as compared to city cemeteries.

Up until recently these low fees for burial affected the viability of cremation in these areas. Although generally still low by city standards, burial charges in rural areas seem high enough to make the building of crematoria more attractive. Subsequently more crematoria have been built in country areas. Local councils operate some cremation facilities but it seems more recently funeral directors are becoming operators.

Most recent crematoria are at Leura in the Blue Mountains and Broulee on the South Coast, both are owned by funeral directing companies and both offer memorial areas for ashes.

There are several crematoria on the Central Coast and in Newcastle (all private with funeral directing connections). Cemeteries are numerous, some attached to the crematoria others controlled by trusts and local government. Where most crematoria in this region offer memorial areas one funeral director operated establishment offers cremation only.

Wollongong Council operates a crematorium that offers memorial areas and operates various cemeteries within their local government area. There is a private crematorium and cemetery at Dapto that offers memorial areas. This establishment has funeral director connections.

There are eight crematoria in the Sydney metropolitan area, five privately owned by the same company. This company also has ownership of a substantial number of funeral directing outlets. There is three trust crematoria. Four of the private crematoria have a cemetery attached, as do all the trust crematoria.

The metropolitan area is served by private, trust and local council cemeteries. Prior to the Macquarie Park Crematorium (commenced 11.11.2004) the other seven crematoria were reasonably evenly spaced throughout Sydney and cremations tended to come from each crematorium's own catchment area. This still appears to be the case with six of the crematoria. Since Macquarie Park (which is situated about 1 kilometre from Northern Suburbs Crematorium) commenced cremating it is gradually building business, about 10% of this business coming from funeral directors connected with Northern Suburbs Crematorium.

Unless a family made a complaint it would be difficult to know if funeral directors were pointing clients towards particular cemeteries or crematoria.

It would be safe to say that none of the crematoria in the Sydney metropolitan area are operating at full capacity.

Cemeteries attract burials from their own catchment area or because they offer religious or specialty burial areas. Price can also be a factor. Burial is currently less favoured than cremation where cremation facilities are readily available. Information suggests that there is approximately 50 years of new burial space left across the greater Sydney metropolitan area.

There seems to be adequate competition except where there is only one cemetery or crematorium. An in-depth study would have to be made to ascertain whether the large joint operation of funeral directors, cemeteries and crematoria in Sydney has an affect on competition.

BASIC FUNERAL

First of all a basic funeral definition would have to be formulated from a cemetery and crematoria aspect.

Once formulated, who would be entitled to a special price? If the price is lower than normal, where would the shortfall created by these special prices be made up?

MORTUARY REGISTRATION AND HOLDING ROOM REGISTRATION

Funeral directors must have access to a registered mortuary and holding room to conduct their business. Clause 5(1) and (2) of the Disposal of Bodies Regulation require that bodies must be prepared in a registered mortuary before burial or cremation.

Cemeteries and crematoria do not require a mortuary and only require a holding room if the body is not going to be cremated within four hours.

Mortuaries and holding rooms are approved and registered by the local council and may be inspected by environmental health officers (council or Department of Health).

The Health Department maintains a list of mortuaries. All mortuaries are required to have a register for movement of bodies.

If the Health Department does not have a current list of all mortuaries how can they know if bodies are being prepared in mortuaries let alone prepared in a proper and safe manner?

Are cemetery and crematoria employees at risk?

LICENSING OF ALL FUNERAL INDUSTRY PARTICIPANTS

The Funeral Industry would be better served by being covered by one piece of legislation, similar to the Cemeteries & Crematoria Act 2003 (Victoria). Currently there is no one Act that governs the administration of cemeteries & crematoria in NSW, Particularly, ownership of Rights of Burial. The Local Government Act 1993 gives no mention of cemeteries and crematoria.

All participants could be licensed under the Act. Following this, "pro-active" rather than "reactive" checking should take place.

ALTERNATIVE BURIAL OPTIONS

Although cremation is cheaper than burial and saves land and may have lower maintenance costs, an earth burial option should always be available.

Vertical burial, although somewhat of a novelty, is being touted as an alternative option to save land.

The number of interments in a burial space is regulated only by the requirement that there must be a 900mm cover over the last burial.

Taking that a coffin is 2m long to inter it vertically the hole would have to be 2900mm deep. If the ground is not entirely suitable, problems would arise with cave-ins, high water table too much rock to excavate, etc.

REGULATORY CHANGES

Regulations governing the industry seem to be adequate. They need to be policed more pro-actively.

Some areas of concern are as follows

1. When a coffin in a crypt or vault is damaged and needs repair and is taken back to a funeral parlour for that repair and returned on the same day, it does not constitute an exhumation. If it takes longer than a day it is classed as an exhumation. This adds unnecessary cost to the exercise.
2. Cremated remains being removed from a grave or memorial garden and moved within a cemetery/crematorium is being defined as an exhumation causing extra cost etc for an task that is simple to perform and neither onerous or unsafe.
3. **Section 52 Approval of equipment for a crematory** has been removed from the Public Health Act. There is no provision in any Act for this approval. With this section removed one would assume that any sort of equipment could be used to cremate. There was no consultation regarding the removal of this Section.



AUSTRALASIAN
CEMETERIES & CREMATORIA
ASSOCIATION

**THE USE OF
CARDBOARD AND
OTHER RECEPTACLES**

November 2004

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3. TO EVALUATE THE SUITABILITY OF A PROPOSED RECEPTACLE AND TO MINIMISE THE LIKELIHOOD OF DISRUPTION TO THE ACTUAL CONDUCT OF THE FUNERAL AND RELATED INCONVENIENCE TO THE FAMILY, THE CREMATORIUM MAY REQUIRE AN EMPTY RECEPTACLE BE DELIVERED:	4
4. IN THE EVENT THAT THE RECEPTACLE IS DEEMED UNACCEPTABLE OR IS NOT MADE AVAILABLE IN A MANNER ALLOWING SUITABLE APPRAISAL TO OCCUR, THE CREMATORIUM NEED NOT ACCEPT IT	4
5. TO DIMINISH THE LIKELIHOOD OF FAILURE IT IS RECOMMENDED THAT:	4
6. ACKNOWLEDGING THE TEMPERATURES AT WHICH CREMATION CHAMBERS OPERATE AND THE EXPOSURE OF THE RECEPTACLE TO RADIATED HEAT, JUST PRIOR TO CHARGING, TESTING SHOULD OCCUR TO ENSURE THAT THE PRE-IGNITION OF THE RECEPTACLE AND RELATED FLASHBACK DO NOT POSE AN UNACCEPTABLE RISK TO STAFF OR THE INTEGRITY OF THE CHARGING PROCESS	4
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Introduction

The guidelines are provided to assist ACCA members in the conduct of their operations.

From time to time inquiries are received about the necessary specifications for cardboard (or other) receptacles to be used for cremation. These guidelines do not purport to be manufacturing specifications.

Their objective is to:

- diminish the likelihood of product failure
- reduce OH&S risk to crematoria staff during the conduct of funeral services at the crematorium
- limit prospective psychological disamenity during the conduct of the funeral
- provide an ongoing basis upon which ACCA Members may objectively decide whether or not to accept a proposed receptacle

It is recommended that the following criteria be applied by crematoria:

1. The receptacle must:

- a. contain a solid base made of wood, composite board or other equivalent suitable combustible material to facilitate storage and handling e.g. transfer between vehicles, upon roller trolleys, charge biers, placement on catafalques etc
- b. be impervious to rain
- c. be constructed in such a manner that:
 - i) distortion does not occur during handling or transportation
 - ii) joints in the receptacle do not come apart
 - iii) when the receptacle is secured within the vehicle that the "coffin stop" or other engaged safety fixing mechanism does not collapse or bend or distort the receptacle
- d. be able to withstand the rigours of being carried/handled by untrained persons e.g. mourners, during the normal conduct of the funeral
- e. have internal dimensions that exceed the measurements of the deceased
- f. have external dimensions limited to a size acceptable for cremation

2. The receptacle lid must:

- a. be secured in a manner which prevents release during handling and transportation
- b. have a suitable name plate attached, bearing the full name of the deceased

- 3. To evaluate the suitability of a proposed receptacle and to minimise the likelihood of disruption to the actual conduct of the funeral and related inconvenience to the family, the crematorium may require an empty receptacle be delivered:**
 - a. to it for inspection on a normal working day prior to the crematio
 - b. or to a nominated testing authority e.g. in NSW there is a requirement that Testsafe, an accredited testing authority, issue certification

- 4. In the event that the receptacle is deemed unacceptable or is not made available in a manner allowing suitable appraisal to occur, the crematorium need not accept it**

- 5. To diminish the likelihood of failure it is recommended that:**
 - a. the body of the deceased should only be transferred into the receptacle immediately prior to transportation for disposition or the conduct of the funeral
 - b. floral tributes being placed upon the receptacle should be constructed in such a manner that their weight, moisture content etc. do not diminish the performance of the receptacle top
 - c. unless there is appropriate testing clarification to indicate that:
 - i. the receptacle has a higher load bearing capacity, then the total combined weight of the receptacle and its contents must not exceed 100kg
 - ii. storage in cooled or refrigerated areas e.g. mortuaries or crematoria holding areas, does not diminish performance, then the receptacle should not be stored in such areas

- 6. Acknowledging the temperatures at which cremation chambers operate and the exposure of the receptacle to radiated heat, just prior to charging, testing should occur to ensure that the pre-ignition of the receptacle and related flashback do not pose an unacceptable risk to staff or the integrity of the charging process**

7. Body Bag:

- a. the deceased must be secured within an opaque body bag which is impervious to liquids and odours
- b. the body bag must be at least a 100um thick and made of material deemed acceptable for cremation
- c. the bag is to be secured in such a way that during transport and handling it prevents:
 - i. movement of the deceased
 - ii. damage or distortion of the receptacle shell

8. Recognising the perceived potential handling and health risks, relative to more traditional coffins & coffins, the crematoria may require that funeral directing staff:

- a. place the receptacle in whatever position is required for the conduct of the service or the actual disposition
- b. remain on site at the crematoria until the charging of the cremator is successfully completed

9. Promotional references:

- a. compliance with these guidelines must not be used for advertising purposes
- b. any other implied or explicit reference to ACCA or state association, without express written authority from its Board, must not appear on any corporate material, plans or advertising material of any kind

In issuing these guidelines, the ACCA Board reserves the right to revoke or vary any of the above if it becomes apparent that these guidelines are:

- do not ensure that receptacles are able to adequately perform their function
- are seen to be prejudicial to public and environmental health

Ultimately compliance of a particular product or funeral director with these guidelines does not necessarily guarantee that all crematoria will accept them.

Further Information

Cemetery and crematoria authorities who are members of ACCA are able to provide further information on these guidelines and associated matters. Similarly, the Head office of ACCA is available to assist organisations and individuals seeking further detail or contacts.

The Guidelines for the Rights of the Deceased and Bereaved will be reviewed regularly, to reflect changes in practices and legislation. Please direct comments in relation to the Guideline to the Head office of ACCA.

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