

INQUIRY INTO CEMETERIES AND CREMATORIA AMENDMENT REGULATION 2018

Organisation: The Catholic Metropolitan Cemeteries Trust

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Catholic Cemeteries
& Crematoria
Care, Compassion, Choice

The Director,
Regulation Committee,
Parliament House,
Macquarie Street, Sydney NSW 2000

By Email: Regulation.Committee@parliament.nsw.gov.au

To Whom It May Concern,

Catholic Metropolitan Cemeteries Trust – submission with respect to the Inquiry into Cemeteries and Crematoria Amendment Regulation 2018

The Catholic Metropolitan Cemeteries Trust (“CMCT”) submits the following comments in relation to the Cemeteries and Crematoria Amendment Regulation 2018.

Renewable Interment Rights

1. Cemeteries are not only places where the dead are buried but are also sites where cultural values are embedded and personal memories enshrined. Operators such as CMCT are charged with the unique and at times difficult task of addressing individual client, specific community and the wider public’s needs and expectations in relation to the products and services offered.

Whilst we support the introduction of a standardised Interment Right system and commend the government on introducing the opportunity for all operators to offer renewable rights as way of addressing the looming burial land shortage in Sydney, concern remains in relation to public attitude and potential adoption of this practice.

CMCT is one of only two Sydney based operators that offer renewable rights through Kemps Creek Cemetery. Whilst acknowledging that the area designated with renewable rights has a limited appeal to a niche market (natural burial); renewable right sales over a 7 year period represent only 1.5% of the overall sales of the site.

Legislating the option to offer renewable rights is one thing, gaining public acceptance of the practice is quite another. The recent media articles following the release of the draft regulation for public consultation are one example of the controversial nature of renewable interment rights.

Considerable investment in public education and awareness needs to be undertaken to improve the potential take up of the renewable option to the degree that it would be a financially viable option for an operator to consider.



Catholic Metropolitan Cemeteries Trust ABN: 85 744 325 709

PO Box 10 Lidcombe NSW 1825, Barnet Avenue, Rookwood

General enquiries P: 02 9649 6423 | F: 02 9643 2869 | E: enquiries@catholiccemeteries.com.au

Account enquiries P: 02 8713 5700 | F: 02 8713 5770 | E: accounts@catholiccemeteries.com.au

Visit www.catholiccemeteries.com.au

2. Whilst the option of renewable rights provides some operators the opportunity to extend existing burial space in conjunction with the ability to generate ongoing revenue at a lower cost base, it is debatable as to whether this is the case for all operators.

As a Not for Profit mission driven organisation, CMCT's existing pricing model is based on its ability to provide sustainable products to its clients at an affordable price point having taking into account development costs, facilities, administration and overheads, utilities, infrastructure maintenance and repairs costs and the future maintenance needs of the site.

Considering that CMCT's existing pricing structure for most perpetual burial rights is already in the mid to lower price range when compared to other Crown and some private operators, it is questionable as to whether offering renewable rights at a further reduced rate is a sustainable business practice for CMCT.

Further investigation and research into the specific requirements for the implementation of renewable rights and the formulation of an appropriate costing model and cost analysis would need be undertaken prior to CMCT considering offering renewable rights at sites other than Kemps Creek.

Suggested Actions

We suggest the following actions be undertaken to support operators and reduce unnecessary regulatory burdens:

1. Develop and socialise a Renewable Interment Right Awareness and Education Program with communities and the public on a regular basis, therefore reducing the potential for negative/controversial media articles and criticism of operators who choose to implement renewable rights.
2. Give due consideration to the development of a consistent renewable interment right pricing model or renewable pricing guidelines, thus reducing the level of potential public criticism due to inconsistent pricing models being utilised by operators across the state.

On behalf of CMCT, we thank you for the opportunity to highlight our concerns in relation to the regulation.

If you have any questions please don't hesitate to contact me on

Yours sincerely,

Peter O'Meara
Chief Executive Officer