

#### **CM14.4. Natural Burials**

**DATE** 29 November 2022 **FIL REFERENCE** FIL22/00044

**CONFIDENTIAL** No

**FURTHER ENQUIRIES TO** Simona Coad **PHONE** 6023 8145  
Service Leader Community & Place

**AUTHOR** Martin Forrester-Reid

---

#### **Purpose of Report**

To provide Council with a report outlining the opportunities and impediments to offering natural or green burials at Glenmorus Memorial Gardens & Crematorium, in addition to the existing options and services currently available including cremation and burial.

#### **Background**

Albury City Council runs cemeteries within the Albury Local Government Area (LGA). Since 1971 the decentralised management and administration of the cemeteries has occurred at the flagship location Glenmorus Memorial Gardens & Crematorium (GMGC) (*previously Albury General Lawn Cemetery & Crematorium*). AlburyCity offers a full-service cemetery and crematorium as well as an architecturally designed crematorium, chapel/reflection room, arrangement/sales/administration offices and original cemetery manager's residence, and is located at 54 Glenmorus Street, Glenroy. Two older cemeteries fall under the management and care of the GMGC operation and are the original Albury General Cemetery (Pioneer Cemetery) and the Waugh Road Cemetery extension.

Death rates have slowed from earlier decades as medical advances, higher living standards and improved attitudes to health have helped lift life expectancy. Usual sector growth from coffin burial has also been restricted by the increasing preference for, and versatility of, cremation. For 2020/21 cremation accounts for 41,448 (70%) of the 58,807 deaths in NSW (New South Wales).

In 2021 GMGC performed 356 services evenly distributed between cremation and usual coffin interment then supplemented by memorialisation and interment of cremations.

Council is subject to a variety of related legislation and regulations, including:

- NSW Public Health (Disposal of Bodies) Regulation 2022
- Cemeteries and Crematoria Act 2013
- Local Government Regulation 1999
- The Burra Charter 1999 (Places of Cultural Significance)
- Heritage Act 1977
- Australian Consumer Law
- Fair Trading Regulation 2019
- Work Health and Safety Regulation 2017

At present, Council's services are interspersed across a standard consumer's funeral experience. Enquiries range from seeking assistance with a death or pre-planning, to making a personal selection of memorial location or burial allotment, to enquiries regarding memorial choices. Most contact with families is concentrated at the end journey. Bookings are received by the Cemetery Team from funeral directors who are responding to the requests of the consumer.

There can be community confusion about where services change from funeral director to cemetery/crematorium/memorial provider. There is also a lack of awareness in the community about what services and functions to expect from a funeral director. There is an opportunity to rectify this situation through improved education and the provision of a full range of customer care elements from starting a conversation about future care planning and pre-need arrangements, to a better understanding of the role of the various specialists working within the funeral industry.

At the meeting of 26 September 2022, Council resolved that:

*"Council staff prepare a report to Council within three months outlining the opportunities and impediments to offer natural or green burials at the Glenmorris Cemetery in addition to the existing services of cremation and traditional burial."*

AlburyCity recognises that natural burial varies across the state, country and internationally. The nature of this form of funeral has changed over the last decade and can be expected to change in the future.

Within the general community there is a lack of awareness about what is considered a 'natural' and 'green' burial that can be resolved with continued education and awareness. This confusion is compounded by the fact that natural and green burials can share elements but are not necessarily the same.

#### *Natural Burials*

For AlburyCity, the interpretation of a natural burial is "a natural burial will refer to full body interment with specific requirements to ensure the benefits of a green funeral are fully realised".

These include:

- the use of a receptacle made from all-natural materials such as bamboo or wicker, or use of a simple burial shroud instead of a coffin
- only readily biodegradable and non-toxic material used with interment of a body (no metals, screws, chemical adhesives, mechanical fixings, etc)
- no use of any chemicals such as those associated with embalming or preservation
- interment sites at reduced depth for only one interment. This depth is the current practice as it is considered to better suit the most active inground soil zone for unhindered decomposition across the widest range of land types.
- individual interment sites not being marked in any way by either headstone, plaque, or other devices, or introduced vegetation.

In an area given over for exclusive natural burial an assessment of each proposed location will be undertaken by cemetery management to better ensure:

- reduced impact on any vegetation
- avoidance of erosion
- avoidance of any groundwater table
- no disturbance of other naturally occurring geology
- the ground excavated for the interment can be safely placed next to the interment site and used for backfilling.
- no introduced soil/sand/fill is used.

Natural burial accommodates one body interment per allocated space. A green choice recognises the wider reality of using the same allocated space but for multiple interments (currently up to three body interments) which reduces the land use needed for dignified familial burial.

Tokens of remembrance may be left in a communal area where a memorial plaque of a discrete nature may be commissioned from the cemetery. This is outside the actual natural burial area. Preparation for interment and any associated works will be carried out by cemetery staff. At the sole discretion of the cemetery authority family members may help in hand preparation only under strict supervision and direction of the cemetery team.

Interment using natural burial is intended to be the final and last interment place of human remains. Exhumation/relocation is not the intent of natural burial and may only be considered on a case-by-case basis in exceptional circumstances as decided by the cemetery manager.

#### *Green Burials*

There is no standard universal industry-prescribed definition for what must be included to constitute a green burial. The span of green or 'greener' choices covers a wide range of specifics. It can be as simple as a gentle impact coffin choice such as a cardboard coffin, through to striving for every aspect of a funeral to be carbon/resource negative/neutral/off-set using renewable consumables with readily biodegradable fixtures, fittings, materials, transportation, pre and post funeral catering and gatherings, etc. The most immediate sustainability goals for burial areas include using every burial allotment to its maximum capacity (currently triple). This means potentially a third less land is used and conserves already identified or developed cemetery land for future generations.

AlburyCity recognises that traditional interment choices can also supply eco-friendly options. Elements of natural or greener burials can be accommodated within lawn and monumental coffin interment areas of the cemetery portfolio and may include:

- all-natural sustainable produced materials e.g., bamboo, wicker coffins
- simple natural fibre shroud
- readily bio-degradable and non-toxic materials
- no use of chemicals for the preparation of the deceased person
- no obligation for a marker plaque.

- the encouragement of discrete fresh flower tokens that may be placed on-site or in a communal area

A more natural or greener interment can also be extended to our memorial gardens and cremation memorials, with:

- interment directly into the soil where possible (no containers)
- memorialisation within a living garden, a memorial shrub, or tree
- simple bronze memorial plaques (no extra embellishment)
- natural stone marker blocks (native rock, quarried granite, etc)

Since 1925 environmentally conscious clients have selected simple efficient cremation with or without memorialisation in dedicated gardens. Cremation technology has continuously improved over the last 97 years. AlburyCity has provided cremation in a garden setting since 1971 with gardens dominated by living trees, shrubs and flowers, set amongst nature. While resources are used for the ~2 hours of a cremation, the longer-term benefit of a living memorial (that comprises a rose bush, decorative shrub, or tree and even a placement in our native bushwalk garden dominated by a special selection of native trees, shrubs, and understory planting) offsets the impact. Albury City Council's cremation equipment is contemporary, works efficiently, utilises solar electricity to run and delivers a standard cremation in approx. 2 hours. This contrasts with an open-ended period for an earth burial to return to the soil. Cremation allows a variety of options including placement on one's own property or dispersal of ashes in a manner that best suits.

### **Issues**

AlburyCity recognises that consumer habits have changed with a more accepting market for alternatives to common coffin burial, along with loosening restrictions about where cremations may be memorialised. To date demand for natural or greener burials has not been significant when considered in relation to all funeral preferences in our immediate region or across wider NSW generally.

For 2021, Local Government supplied 45% (5,541 burials) of NSW burials across 691 active cemeteries. The remaining 55% of NSW burials were provided by the NSW (Crown) Government (Sydney metro – 4,102 burials), private sector corporations (Sydney Metro/Central Coast – 2,690 burials) and church/community sector (292 burials). Of the 691 active cemetery locations, there are three NSW Local Government operators (Lismore, Shoalhaven, Wagga Wagga) offering some components of natural or green burial.

Recent evidence shows natural burial in the ACT has attracted eighty services over the last nine years and one service over the last nine years in Wagga Wagga, despite active promotion. Shoalhaven Bereavement Services in Nowra has offered a form of natural or green burial since 2016 in the village cemetery at West Cambewarra. There have been ten (10) burials to date.

The natural burial areas offered by these Government providers are on repurposed brownfield sites (developed areas of a degraded nature that may benefit from repair) that have been changed from remnant natural landscapes. Despite interest in the general philosophy, the above cemetery providers confirmed that there is little interest in natural burial over other burial requests. ACT believes with

strong marketing, this may change. This is mirrored closer to Albury where there is little demand for the choice.

At all these locations the natural burial offering has been a way to either correct past degradation of either highly modified grazing paddocks, other brownfield/difficult landscapes, or to use areas that were not workable for any other purpose due to, for example, habitat preservation orders. All the providers recognise it does not appeal to a wide segment because not everybody likes having to walk through bushland or use GPS technology to find a burial place, and this can be at odds with friends and relatives wanting a permanent central focus for their bereavement with permanent markers with names, dates, etc at the place of interment.

Sufficient depth and stability of soil profile has also been critical in offering the choice, without which there would be no burial. Most natural burial offerings have had to introduce fill to gain sufficient depth for interment over shallow rock substrate. The universal use of mechanical digging is a cornerstone of these locations even though that is at odds with the intent to have a natural burial or green funeral footprint.

Natural burial has not currently been requested by the Albury/Wodonga community or the region's funeral suppliers. Creating a market demand for natural burial could be possible with considerable marketing and promotion to shape the market and systematically divert from the current wants and needs of the community. This would be aided by an active role at the beginning of the funeral journey for Albury City Council to promote this choice over cremation, lawn, or monumental burial. There would naturally be significant operational costs associated with this which would need to be considered.

It is sensible to believe that any turn to natural burial would be at the expense of existing cemetery services already developed with long-term availability for at-need use or pre-need reservation. Subsequently, this introduces significant new untested financial pressure to the business.

Performing a natural burial at GMGC is not currently considered workable due to the difficult and shallow soil profile in much of the remaining undeveloped land holding. It is recognised that most of the remaining hillside land is pockmarked with 19<sup>th</sup> and early 20<sup>th</sup>-century gold prospecting claims cut into the shallow surface quartz rock. Access to safe working conditions is also unreasonable using the typical mechanical digging equipment long used in the provision of burials. Preparing this land for dignified burial use will require significant upfront operational investment to excavate to a minimum depth then backfill with minimum standard soil to allow safe interment. The cost of this choice is considered uneconomic to recover land preparation outlays. Indeed, this would drive the cost of the service beyond our current reasonable burial services.

Presently there is no market demand for natural burial in Albury. Resources that are currently unavailable will be needed to develop and manage this alternative burial choice. This will potentially compromise the long-established and existing burial choices. The cost to obtain ground that meets natural burial intent, distribute interment sites, and carry out interments make this a more expensive choice per item than the current dependable burial styles.

Components of a green or 'greener' burial can be accommodated within existing cemetery developments and burial choices available in Albury. GMGC cemetery operations currently support the use of all natural biodegradable materials for coffin construction, there is no necessity for any chemical treatment of the deceased for either burial or cremation and the use of all-natural clothing again reduces impact. Similarly, there is no current necessity to mark a coffin burial with a memorial. These elements are central to green or a 'greener' style burial and can be applied (with approval) to current burial choices at GMGC.

A green or a 'greener' burial footprint is achievable in several ways. This may include the use of readily biodegradable coffins (e.g.: cardboard, untreated wicker, or natural fibre construction), no chemical treatment of the body post-mortem, washing and clothing in only biodegradable solutions and clothes with no synthetic content, use of fresh grown flowers only for periodic visitation remembrances, etc. GMGC has not received specific requests for green burial elements other than multiple use (triple interment – where available) of burial allotments.

It is not recommended that natural burial be brought forward over other bereavement and memorial choices to be evaluated as part of the future cemetery business plan for Council. It is however possible that a 'green' burial guideline be further promoted in concert with other choices in the coming years.

AlburyCity will approach green burial choices from an educational perspective that will support our community in making better informed consumer choices and understanding their options relating to a particular funeral style. This includes communication and education about contemporary preferred or 'greener' materials to ask funeral suppliers for e.g., all natural coffins, non-synthetic clothing, use of only fresh flowers as tributes, etc.

The team will continue to monitor the demand for natural and green burials in the Albury LGA and develop the GMGC Business Plan by June 30, 2023, to include greater understanding, awareness and education to the community and funeral industry for green burial choices. This will include promoting those aspects of a green burial that can be offered to the community that are possible and financially responsible given the level of demand and logistical considerations.

This approach will address Albury Towards 2050:

- 3.5 Albury is a safe inclusive and accessible region for our entire community
  - 3.5.3 Albury City will create safe spaces and places by using the latest technology and approaches available
- 4.2 Albury collaborates as a community to plan for the future and work towards a shared vision.
  - 4.2.2 Use innovative engagement technologies and tools to facilitate conversations that involve the community.

## Risk

For Albury City Council to implement a complete Natural Burial option, many risks must be mitigated:

- **Business Risk –**
  - risk of launching an untested product in the local region
  - potential to erode existing business operations
  - new grounds will need to be acquired, planned, and developed with ongoing maintenance and management demands not covered by existing resourcing
  - significant financial allocations will need to be supplied
  - risk of alienating client base with an option that is not wanted.
- **Corporate Risk -**
  - reputational risk with developing a natural burial option that has no real demand currently in our LGA.
  - risk in promoting what is perceived as an 'unmanaged' burial
  - possibility of clandestine burials
  - risk in bringing one option forward before other more popular customer care products are strategically evaluated with complete business planning.
- **WHS and Public Risk -**
  - difficulty in preventing public access to an unmanaged area of shallower burials and the associated implications of changing the surface water runoff dynamics
  - access is compromised by the unchanged nature of the landscape (uneven surfaces, etc)
  - operator risk in accessing bushland with digging equipment.
- **Environmental Risk –**
  - where managed under the relevant regulations, natural burial poses no unnecessarily increased risk to the environment
  - using key elements of 'greener burial' may aid decomposition and reduce the length of time human remains stay entirely in the ground.
- **Delivery Program Risk -**
  - no resourcing exists to hasten planning to look at this level of alternative funeral choice
  - land available is not suitable for the holistic natural burial choice because the land will require extensive excavation to remove rock or contaminants at significant financial and operational impost.

## Community Engagement

Industry engagement has been undertaken with best-fit cemetery contemporaries, local funeral directors and other industry specialists including the Cemeteries & Crematoria Assoc NSW.

## Options

That Council:

1. Receives and notes the contents of this report;  
**Recommended.**

This option is recommended as it recognises that the community is beginning to express some interest in green burials, monitors the market and ensures that the community has choices that are practical for the current environment.

2. GMGC investigate the feasibility, cost and implementation considerations for setting aside a part of the cemetery for natural burials. **Not recommended.**

This option is not recommended as there is little demand for this choice at present and the financial and operational challenges of implementing this are currently prohibitive.

3. Do not consider or implement any changes to burial options, relying on other providers to address any trends. **Not recommended.**

## Conclusion

On 26 September 2022, Council asked that Council staff prepare a report to Council outlining the opportunities and impediments to offering natural or green burials at GMGC in addition to the existing services of cremation and traditional burial.

Within the general community, there is confusion between what is considered a natural and green burial that can be resolved with continued education and awareness. This confusion is compounded by the fact that natural and green burials can share elements but are not necessarily the same.

This report gives an overview of natural and green burial for use as a guideline for this burial choice moving forward. Industry stakeholder feedback from both funeral directors and consumers shows there is little to no demand for natural burial from the Albury Wodonga region, although there are opportunities to promote and develop greener elements of funerals. While the principles of natural burial have merit, the application presents high financial and reputational risk to the business and is compromised by the need to develop and alter the remaining present native habitat portions of the GMGC landholding.

The growth of likely community interest can be addressed through a comprehensive customer care focused funeral business plan that includes education on current and forecast green alternatives for funeral choices, whilst monitoring demand for natural burials.

The team will develop the GMGC Business Plan by June 30, 2023, to include greater understanding, awareness and education to the community and funeral industry for green burial choices. This will



include promoting those aspects of a green burial that can be offered to the community that are possible and financially responsible given the level of demand and logistical considerations.

**Recommendation**

That Council receives and notes the contents of the report.