

SUBMISSION TO INTERMENT INDUSTRY REGULATORY REFORM CCNSW JULY 2022

EUROBODALLA SHIRE COUNCIL

Eurobodalla Shire Council manages eight operational cemeteries, averaging 60 bodily interments and 19 ashes inurnments per year over the past ten years.

Council offers perpetual interments rights only, and has no plans to offer renewable rights.

Council does not have any dedicated cemetery staff.

Arrangements with funeral directors and families are managed by administration staff within the Works division.

Grave digging, approvals for monumental works and cemetery maintenance are managed by parks staff, also within the Works division.

Many of the proposed licensing requirements are already met within our existing policies, procedures, and IP&R framework.

1. OVERALL COMMENTS

ESC welcomes the introduction of a framework and consistency among cemetery operators and will require ongoing assistance from CCNSW to assist with meeting licensing compliance requirements.

Some conditions are considered reasonable, and are currently met within existing policies, procedures, maintenance schedules, fee transparency, customer service charter etc.

Some proposed conditions are considered onerous, and unable to met within existing budgets, eg: maintenance as proscribed in the self-assessment checklist.

CONDITION A -Consumer Contracts

Council does not foresee any issues with most of these requirements and are clearly defined in our burial rights licence forms (currently being amended and updated). Both parties sign that they understand the requirements and accept the relevant terms and conditions.

CONDITION B- Cemetery Maintenance

The schedule and level of service for operational maintenance activities (vegetation control) is managed by the REFLECT program, which issues work orders and records activities.

Trees are managed under Council's Tree Risk Management policy for reserves.

Following the 2019/20 bushfires, all trees in or adjoining cemeteries were inspected, resulting in some removals.

Unplanned maintenance and tree inspections are managed via the customer service request system.

Council meets most requirements here but does not have budget or plans for on-site signage to identify individual grave sites. This information is provided on request.

The self-assessment checklist is too onerous for such a small operator, with limited financial resources. Council has a risk management framework and manages risks across their portfolio according to level of risk and resourcing. We do not meet all the requirements of the maintenance checklist and do not intend to increase our level of service in this space in order to achieve all requirements. Our resources are allocated appropriately to our higher risk assets and areas.

The requirement should state that Council has a risk management plan/framework for managing risk in cemeteries not dictate the level of risk management. As a guide, Council only has the resources to formally inspect local sealed roads once per year. It comes down to what level of risk the Council and the community is willing to accept at public cemeteries.

CONDITION C – Pricing Transparency

As with all LGA's, Fees and charges are reviewed annually, placed on public exhibition for comment before adoption by council, and available on council's website.

"Exception is Crown cemetery operators whose prices will continue to need approval by CCNSW"

We are not aware of this previously, and unsure how this would occur. CCNSW has the opportunity to provide comment on the fees during the public exhibition period.

Council would not be able to quantify the share of perpetual maintenance costs for each site, as in the proposed pricing transparency template. We don't intend to charge a fee for this going forward.

The estimated costs of excavations and maintenance are considered in the annual review of fees.

The cost of excavations varies due to terrain, eg: rock, sandy soil.

Operational staff costs checking and assessing sites, approving monumental permit applications and pegging sites are absorbed within existing general maintenance budgets

As many other councils have noted, quarantined perpetual maintenance funds are unlikely to be allocated due to financial constraints.

Council must continue to meet community requirements and expectations regarding affordable options and has a constant revenue flow. Significant increase in cemetery fees would not be acceptable to the community.

Council does not support the use of this pricing template. The pricing is part of Council's annual fees and charges template. Some of these line items are not appropriate.

CONDITION D- Customer Service

Incorporated in existing policies and procedures- Customer Service Charter, Code of Conduct, Customer Request Management system.

CONDITION E- Religious, Cultural and spiritual practices

Broadly, council currently complies.

Council currently engages on an individual basis to discuss specific requests.

E.2 Aboriginal cultural and spiritual principles.

Council has a working knowledge of our local community, and specific requests invariably differ between individuals and families within cultural groups, as noted in E.2.2.

Consensus would be unlikely to be achieved. There are six Local Aboriginal Lands Councils within Eurobodalla Shire.

E2.4 Council does not charge extra for providing sand and shovel for backfilling by hand

Council does not have a consultative committee for cemeteries, except for an informal agreement with one individual cemetery committee. Council does not intend to form a committee or engage an Aboriginal Liaison Officer.