

## **Proposed Cemeteries and Crematoria Amendment Regulation 2022**

Response to consultation draft, July 2022

From: Denise McConnachie, on behalf of The Forest Cemetery, Middle Arm Road, Goulburn NSW 2580

1.0 The Forest Cemetery is a small half acre Cemetery located about 15 kilometres from Goulburn NSW. We have a total of around 50 interments dating from 1877. Our cemetery respects and preserves the memory of pioneer settlers from the later 1800s. We have about one, or less interments per year. We have a small number of pre- paid interment sites.

2.0 Our Cemetery is managed by a volunteer committee. We are an Incorporated Community Association - The Forest Cemetery Association Inc - (INC1500744) All our cemetery maintenance is carried out by volunteers. We hold an annual working bee to complete any larger landscaping projects. Mowing the cemetery is achieved by a roster of volunteers. The roster is reviewed at each Annual General Meeting.

3.0 Our biggest concern about the proposed licensing of Cemetery Operators is the financial impact. We do not have a secure income stream to meet Cemetery operating expenses. We have a budget of less than \$1500 per year. Our biggest expense is public liability insurance which costs around \$800 per year. Our income is dependent on donations from our members.

4.0 Our continued financial viability would be impacted if we were to be obliged to meet licensing costs. If our Association were to fail due to lack of financial capability, our Cemetery would revert to be managed by Goulburn City Council. None of our members would welcome this and many would likely withdraw their voluntary efforts to maintain the Cemetery.

5.0 Our Cemetery has no issue with the conditions of the licenses, as outlined to date. We have an Operational Management Plan which has been widely circulated and is made available to anyone interested in our Cemetery. In this plan, our pricing policy is set out very clearly. Our arrangements for Cemetery maintenance are discussed. Our customer service procedures are documented. We state that we do not discriminate in accepting interments on the basis of race or gender preferences, religious conviction or cultural differences.

6.0 If Cemeteries and Crematoria NSW have any concerns about our operation, we would respond promptly and carry out consultations with our members to develop an appropriate response.

7.0 Given that we have an endorsed Operational Management Plan which addresses most of the conditions to be covered by a license, we have difficulty appreciating what benefit a license agreement would deliver for our Cemetery. Indeed, at this stage, we can only see that there would be a disbenefit, in the form of an unwelcomed financial impost.

8.0 We therefore support Option 2 in the Reform Discussion Paper, which suggests that Category 3 and Category 4 Cemeteries be exempted from participating in the licensing arrangements specified in the draft legislation.

Thank you for providing us with the information about the proposed Licensing Regulation and for providing us with the opportunity to comment.

Denise McConnachie  
Vice Chairperson  
The Forest Cemetery Association Inc

25 July 2022