



Anglican Church Diocese of Sydney

LEVEL 2, ST. ANDREW'S HOUSE
464-480 KENT ST
SYDNEY NSW 2000
TELEPHONE: +61 2 9265 1555

ALL CORRESPONDENCE TO:
PO BOX Q190
QVB POST OFFICE NSW 1230
www.sds.asn.au

28 February 2020

Interment Costs and Pricing Review
Independent Pricing and Regulatory Tribunal

By email

Dear Tribunal Members,

Response to the IPART interim report on Review of Costs and Pricing of Interment in NSW

The Anglican Church in New South Wales is organised into seven geographically based Dioceses. Each Diocese is further divided into local parishes, to which the Diocesan administration provides advice and leadership. In the case of cemeteries and columbaria, responsibility for management of the facilities rests with the minister and wardens of each parish. Collectively, the Anglican Church accounts for 173 of the 296 church based interment facilities listed on the CCNSW register.

This response to the interim report addresses those recommendations of particular relevance to church based cemeteries.

More transparent cemetery prices

Church based Anglican cemeteries are often managed by volunteers or administrative staff who work part time and have many other responsibilities. We agree that cemetery pricing should be transparent however we are concerned that the requirement to publish pricing may impose an obligation to set up websites specifically for this purpose and an unsustainable administrative burden. Many of the church cemeteries that are still officially open according to CCNSW criteria only have a limited number of plots that are reserved for church members so it may be helpful to discriminate between these cemeteries and those that are operating on a commercial basis with stock available to the wider community.

Location of land for new cemeteries

The provision of cemeteries is no longer considered part of the social services that churches provide to the broad community. The Anglican Church across NSW is not intending to extend its cemetery holdings beyond existing cemeteries and as such will not be a contributor to providing more burial space for the future. We do however support the urgent acquisition of new land for cemeteries to ensure the ongoing ability of families to provide dignified interments of choice for their loved ones. Whether this is done through the regulator or cemetery operators is not a concern for the church, however given the evident political difficulty in establishing new cemeteries it seems that government intervention may be required to compel councils to approve sites for new cemeteries. A coordinated strategy by key stakeholders in this area would be supported by our constituency.

Adequate Financial Provision for Cemetery Maintenance in Perpetuity

The costs of maintaining church cemeteries where the majority of burials are of historical interest is of significant concern to the Anglican Church in New South Wales. We welcome the plan to conduct a further study into legacy costs in existing cemeteries as an important step to ensure equity not just for families seeking interment, but also for cemetery operators. We are very willing to meet with tribunal members and introduce them to our church based cemeteries and the challenges faced by local churches in cemetery management.

Within the Anglican Diocese of Sydney (an area reaching from Berowra to Ulladulla, and Lithgow in the west) approximately thirty parishes have cemeteries. Half of these are closed to future burials, and the majority of the remainder have only a few plots either awaiting use or yet to be sold. The potential for realising significant income from these cemeteries through additional interments is minimal, and the income for churches is realised locally and mainly through congregational freewill offertory.

The maths for the establishment of perpetual funds for the maintenance of these cemeteries is frightening. Basic mowing and grounds keeping has been costed at \$20,000 per annum. With this as a baseline, each cemetery would need a fund of one million dollars to achieve that income annually – not allowing for income capitalisation to preserve the real value of the fund. We strongly recommend that any legislation regarding a requirement for perpetual funds exclude cemeteries established and cared for by faith based groups unless state funding is made available for the establishment of these trusts.

A perpetual fund at this level would also not cover the repair of old memorials when needed to make them safe. The reality is that without alternative methods of management the aesthetic and heritage value of these cemeteries will rapidly erode as the volunteer operators have to make decisions based on safety and cost rather than being able to creatively care for and manage their cemeteries as an asset for both the church and the community.

More transparent interment services

We support any measure that makes the decision making of families following the death of a loved one easier – as reflected in this recommendation.

More cost reflective pricing for new cemeteries

As you will already be aware, the pricing for new cemeteries will not be a direct concern of ours. We are keen to investigate options where cemeteries with little remaining stock might optimise income and works towards securing the long term maintenance of historical cemeteries.

Yours sincerely



PENNY BARLETTA
Manager, Parish Property Services
Anglican Church Property Trust Diocese of Sydney