



Our reference: 9282835
Contact: Lynda Lowe
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1 October 2020

Jennifer Vincent
Director, Pricing
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Sent by email: Jennifer_Vincent@ipart.nsw.gov.au

Dear Jennifer

Review of costs and pricing of interment in NSW

Penrith City Council thanks IPART for the opportunity to participate in the review of interment costs and pricing in NSW.

Council has reviewed the draft document and the content has been assessed, with Penrith City Council supporting the position of LGNSW in this matter. The following submissions concur with our position.

- The proposed regulatory framework seems to be unnecessarily heavy handed and costly to administer, particularly when applied to councils – costs that will ultimately be passed on to consumers. This would seem to conflict with the objective of reducing costs.
- IPART has not made the case for why council-run cemeteries should be subject to this regulation, in fact finding that in regional areas (where council cemeteries predominate) IPART has found that a lack of competition has **not** generally led to higher prices. IPART further notes that it has not made findings on the efficiency of council cemeteries' costs and prices due to a lack of data.
- Unlike other operators, council-run cemeteries are already adequately captured by existing regulatory and financial oversight of local government in NSW (particularly through the LG Act).
- IPART's proposed industry scheme seeks to impose a one size fits all approach to cemetery regulation in the absence of supporting evidence. Increased costs of compliance would likely result in higher interment prices, particularly in regional areas, for no demonstrable benefit.
- A lighter touch regulatory approach would be preferred, which could involve setting pricing principles, establishing benchmarks and only investigating outliers (i.e. intervention by exception.)

If you require further information or clarification on any of Council's responses please do not hesitate to contact Lynda Lowe, Cemeteries Supervisor on [REDACTED]

Yours sincerely

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Brian Steffen
Director City Services

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