

**Cemeteries & Crematoria NSW**

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# Interment Industry Scheme

Feedback from consultation

October 2022





# Acknowledgement of Country

The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the Traditional Custodians of the land and show our respect for Elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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Interment Industry Scheme

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# Overview

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## About the Interment Industry Scheme

The Interment Industry Scheme is a licensing framework for cemetery and crematorium operators within NSW. Two recent reviews – the statutory review of the *Cemeteries and Crematoria Act 2013* and the Independent Pricing and Regulatory Tribunal's (IPART's) Review of costs and pricing of interment in NSW – recommended significant changes to strengthen the interment sector and protect consumers. Cemeteries & Crematoria NSW (CCNSW) has developed the Interment Industry Scheme in response to these reviews.

By creating industry standards and supporting compliance through education and advice, the scheme will improve how operators meet the interment needs of consumers and communities in NSW. The scheme will benefit consumers, operators and the regulation of the sector.

Consumers will:

- know the operator they engage with is licensed and will be abiding by certain requirements
- have increased clarity, transparency and detail about contracts, pricing and service
- get a high level of customer service from operators and know their personal choices will be respected and specific cultural and linguistic needs supported
- expect operators to understand and better meet their religious, cultural and spiritual needs
- feel more confident in the maintenance standards of cemeteries.

Operators will benefit by:

- having certainty around achievable requirements and standards they must meet
- lifting the standard and perception of the industry
- attracting and retaining high-quality staff through professionalisation of the industry
- progressing towards meeting community expectations and building positive interactions.

The scheme will licence all cemetery and crematoria operators in NSW for the first time. It will introduce requirements for operators in 5 key areas:

- consumer contracts – standard terms and conditions explained clearly so consumers can understand what they are paying for
- cemetery maintenance – to make sure there are clear minimum standards for every cemetery
- pricing transparency – so consumers know what they are purchasing and can easily compare prices
- customer service – to ensure operators are consistently providing quality service
- religious, cultural and spiritual principles – to ensure respect for religious and cultural requirements and promote understanding of the unique importance of Sorry Business to Aboriginal people.

More information on the Interment Industry Scheme, including fact sheets on each of the above licence conditions, is available on the [Interment Industry Scheme page of our website](#)<sup>1</sup>.

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## Overview of consultation

Cemeteries and Crematoria NSW has undertaken 3 stages of consultation on the proposed Interment Industry Scheme:

**Stage 1:** Throughout **2021**, we consulted with operators and key stakeholders including the Industry Consultative Group, Community and Consumer Consultative Group, faith groups, and Aboriginal community representatives.

**Stage 2:** From **November 2021 to January 2022**, we consulted with operators on the draft scheme and discussion paper.

**Stage 3:** From **June to July 2022**, we consulted with the public, operators, consultative groups, and Aboriginal and religious and cultural representatives on the updated draft scheme and the draft regulatory impact statement.

This report details the results of the stage 3 consultation.

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<sup>1</sup> [www.industry.nsw.gov.au/cemeteries-crematoria/interment-industry-scheme](http://www.industry.nsw.gov.au/cemeteries-crematoria/interment-industry-scheme)



# Stage 3 consultation

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## Public consultation

Public consultation ran from 22 June to 31 July 2022. CCNSW consulted with the public and community representatives in a range of ways including:

- an online meeting (webinar)
- print advertising in metropolitan, culturally and linguistically diverse and community publications
- social media advertising via a Facebook campaign
- an online survey
- electronic direct mail/emails
- engagement with Aboriginal Elders and knowledge keepers across NSW
- an in-person religious and cultural forum with community leaders and representatives.

CCNSW engaged a large cross-section of the community via Facebook, the consultation webpage and an online survey. The results were:

- a reach of over 500,000 people via 3 Facebook posts
- nearly 4,000 visits from 1,475 stakeholders to the consultation page
- 219 fully or partially completed survey responses, most supporting the introduction of licence conditions.

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## Religious and cultural consultation

CCNSW partnered with Multicultural NSW to host a forum for religious and cultural representatives. The in-person event had 32 attendees including representatives from the Chinese community and representatives of Buddhism, Christianity, Judaism, Hinduism, Islam and non-traditional religions.

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## Operator and key stakeholder consultation

There was strong engagement from industry, particularly at online events. We received 21 written submissions from industry and community stakeholders.

Table 1. Summary of industry engagement at consultation events

Consultation event	Attendees
Industry webinar	87
Industry deep dive webinar	51
Church working group webinar	48
Council working group webinar (25 regional, 7 metro)	39
Final Q&A online drop-in session	2

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## Consultation with Aboriginal representatives

CCNSW engaged with Aboriginal stakeholders in-person and online about the Scheme. There was a particular focus on the Aboriginal cultural and spiritual principles for burial and cremation. The consultation captured key requirements that will be included in guidelines that accompany the scheme.

The stakeholder groups were:

- NSW Aboriginal Land Council (NSWALC)
- NSW Coalition of Aboriginal Regional Alliances (NCARA)
- NTSCORP
- Aboriginal Affairs
- Coalition of Aboriginal Peak Organisations (CAPO).

CCNSW also engaged with Aboriginal Elders and knowledge keepers in Ashmont, Dubbo, Newcastle, Tamworth, Wagga Wagga and Wollongong. These locations were chosen because of their high Aboriginal populations and to ensure a mix of coastal, regional, and larger cities were included.

Consultation was also promoted publicly via social media platforms LinkedIn, Facebook, and within Government, via Yammer.

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## Overview of feedback received

We received feedback via formal written responses, emails, survey responses, online comments and during consultation events.

There was clear community support for the proposed scheme via all communication channels. For example, in response to the survey:

- 74% of respondents expressed support for the proposed scheme
- 7% expressed responded negatively to the scheme
- 19% provided neutral or inconclusive responses.

We received feedback on the Interment Industry Scheme, the proposed religious, cultural and spiritual guidelines that will accompany the Scheme, and on a broader range of related issues. This is summarised in the following sections, along with a summary of the changes made in response.

## Feedback on the Interment Industry Scheme

Most feedback we received supported the intent of the Interment Industry Scheme – contracts should be easy to understand, prices should be transparent and easy-to-understand, minimum customer standards should be enforced to support consistency across the industry, and Aboriginal burial practices and Sorry Business must be respected, as must all religious rites and rituals.

We received extensive feedback from operators and other key stakeholders, in particular, through written submissions. We analysed the responses and grouped them into key themes, as shown in Table 2. Changes made to the regulations and licence conditions in response to this feedback are in ‘Appendix 1 – Changes made to the scheme following consultation’.

Other feedback related to the need to explain things more clearly or to assist operators with understanding the new requirements. We have included more information in the Interment Industry Scheme fact sheets, which are available on the CCNSW website.

We will provide more detailed explanations of the new requirements to operators in explanatory materials, which will be released well before each set of conditions commences (see our Implementation and transition fact sheet [on our website](#) for details).

Perpetual maintenance was included in stage 2 consultation with operators. We removed this for stage 3 public consultation because of the complexity of this issue. We will conduct further consultation and modelling work to develop workable, meaningful requirements that could be introduced into the scheme as a second stage.



Table 2. Key themes that emerged during stage 3 consultation

Theme	How CCNSW is responding
<p>Implementation of the scheme may be costly to some operators and may impact the cost of burial and cremation.</p>	<p>CCNSW will minimise any additional operator costs by providing clear explanatory material about what operators need to do to become licenced and comply with each set of conditions, along with templates for key documents (such as the interment rights contract, and the complaints register).</p> <p>Operators are free to contact CCNSW about any issues they are having in transition, and guidance and support will be provided.</p> <p>CCNSW will also discount licence fees for smaller operators, and those of limited means can apply to have fees waived altogether</p>
<p>The criteria for licence categories need to be changed to remove risk as the basis for categorisation and to distinguish between operators.</p>	<p>The risk-based categories in the draft scheme have been amended to simpler size-based categories.</p> <p>Acknowledging there was not a significant distinction between the requirements that applied to Category 1 and Category 2 operators, the categories have been further amended to make a clearer distinction in both size/activity and in requirements.</p> <p>Category 1 operators will now be those who conduct over 100 interments per year (based on the average of the last 3 years).</p> <p>Category 2 operators will be those who conduct 50–99 interments per year, as well as crematoria-only operators.</p> <p>Category 2 operators will now have a reduced set of requirements for cemetery maintenance and for customer service.</p>
<p>More time is needed to comply with all the licence requirements.</p>	<p>The transition period has been extended from 12 months to 24 months, with licencing to commence from 1 July 2023. Licence conditions will then come into effect in 3 stages to allow operators time to become compliant.</p> <p>All operators will all need to be licenced and fully compliant by October 2024.</p> <p>For more detail on the transition period, see ‘Appendix 2 – Overview of extended transition period’.</p>
<p>It is unclear how licence requirements will be met when working with 3rd party providers such as funeral directors</p>	<p>CCNSW is in consultation with key funeral director bodies about this key relationship.</p> <p>The licence conditions have been amended (A.2) to state that, where applicable, an authorised agent (such as a funeral director) who is executing the contract with the customer on behalf of the operator, must sign a declaration to say that they have complied with the obligations of the operator (e.g. explained the terms and conditions and given the customer time and privacy to consider the contract before signing). The customer would then also be required to sign to agree that they have had key terms and conditions explained to them. This is similar to the current arrangements that some operators already have in place, where declarations are signed.</p>

Theme	How CCNSW is responding
Reporting requirements duplicate existing council regulation.	<p>CCNSW has established a council working group and is examining how to best recognise equivalent reporting requirements for councils.</p> <p>In addition, this working group will establish a 'community of practice' so that less resourced councils can learn from those councils who are advanced in their implementation of the conditions</p> <p>The commencement date for the pricing conditions has been extended to 1 July 2024 to align with council timeframes for amending their fees and charges.</p>
Some details of the licensing system as contained in the regulations were unclear.	<p>Changes have been made to the licence assessment process, as outlined in 'Appendix 1 – Changes made to the scheme following consultation'. In particular, the fit and proper person test has been removed (though suitability checks will remain).</p>
The pricing transparency requirements need some clarification.	<p>In response to feedback, CCNSW has made minor changes to the template for specifying costs of basic products.</p> <p>The required fees and charges to be itemised and shown in the individual contracts have also been aligned to use the same terminology as the pricing breakdown template, to avoid confusion.</p> <p>A third basic product type, Basic Cremation Only, has been added to the 2 products that were in the draft scheme (Basic Adult Burial and Basic Ash Interment). This will give greater pricing transparency over a commonly purchased product. The price template for this product will need to be developed in consultation with operators.</p> <p>Many of the requests for clarification made during consultation will be addressed by CCNSW in the explanatory material, which will be released 12 to 18 months before these requirements begin.</p> <p>CCNSW will carefully watch cemetery pricing. If the transparency requirements do not have the desired effect or have unintended effects, we will consider introducing stronger pricing regulation.</p>
The industry was concerned about the potential challenges of requiring religious and cultural requirements to be delivered at 'actual cost'.	<p>CCNSW has amended E.1.4 and E.2.4 to say that any costs incurred in delivering a religious, cultural or spiritual requirement must be transparently disclosed. If there is a charge, operators should clearly indicate the amount and rationale for that charge. This will give consumers more clarity about why there may be fees and charges associated with meeting particular requirements. Where those fees and charges appear to be unreasonable, CCNSW may consider further action.</p>

Theme	How CCNSW is responding
Industry representative bodies and operators did not feel the benefits of the reform were well articulated.	<p>Both the NSW Government's statutory review and IPART's review identified there are significant risks to the interment industry and the public without stronger regulation. We have drafted the proposed Interment Industry Scheme to address most of these risks. Clearer industry standards will benefit consumers who will know the cemetery or crematorium operator they deal with will be licensed and must abide by certain requirements.</p> <p>There was strong public support for enhanced regulation in this area, and broad support from operators for the concept of the Interment Industry Scheme. There was more than 75% support shown through our survey for each of the 5 licence conditions.</p> <p>CCNSW will undertake an evaluation and track key metrics over the next 5 years as the basis of a scheduled future review of the scheme and for continuous improvement of the scheme.</p>

## Feedback on the religious, cultural and spiritual principles and guidelines

Table 3. Overall feedback on religious, cultural and spiritual principles and guidelines

Theme	How CCNSW is responding
We need to ensure the variation of practice within a broader religious group is respected.	Guidelines for operators on the religious and cultural requirements of specific communities will be developed with the communities themselves, so they can identify these important variations.
We need to expand scope to consider value-based systems, such as environmentalism and spirituality.	CCNSW will consider this issue further and include explanatory material to support religious, cultural and spiritual licence conditions.
Guidelines should facilitate conversations between communities and operators and draw their attention to certain issues.	Guidelines for operators on religious and cultural requirements will be developed by communities to ensure they are thorough and reflect the specific needs of communities.
Specific needs such as shrouded burials or witnessing of cremation must be included.	Where communities have specific religious and cultural requirements, they can indicate this during the development of the religious and cultural guidelines.
There was support for stronger regulation of pricing and measures for affordability of interments generally.	Pricing transparency will be required under the scheme, along with common terminology and price breakdowns to support competition. If prices continue to be an issue, stronger price regulation can be investigated.

Table 4. Feedback on scheme implementation

Theme	How CCNSW is responding
<p>The principles could be included in contracts, which are also where religious and cultural requirements should be recorded.</p>	<p>Explanatory material developed for operators will recommend how best to capture information about the specific needs of consumers.</p>
<p>There should be information on the role of funeral directors and how they interact with the scheme.</p>	<p>CCNSW does not regulate funeral directors. However, it will continue to work closely with Fair Trading and funeral directors to support consumers and the industry as the scheme is introduced.</p> <p>A fact sheet explaining the role of funeral directors compared the role of cemetery operators in more detail has been developed.</p> <p>There is also a fact sheet explaining the impact of the Interment Industry Scheme on funeral directors, where they may be acting as the agent of an operator.</p> <p>These fact sheets are available on <a href="#">our website</a>.</p>
<p>There was interest in how compliance will be enforced, penalties applied, and complaints handled.</p>	<p>More information on the compliance and enforcement approach will be released soon. This will be based on the approach outlined in the CCNSW Regulatory Framework.</p>
<p>Issues were raised around the ability of smaller operators to implement the principles.</p>	<p>CCNSW expects the explanatory material will sufficiently support all categories of operator and will work with smaller operators to support their specific needs.</p>

Table 5. Feedback on support and education

Theme	How CCNSW is responding
<p>CCNSW should look at ways to encourage more pre-need purchasing of cemetery products, so people are better able to rationally compare prices</p>	<p>This is currently out of scope for the scheme but CCNSW will consider the benefits of encouraging pre-need purchasing as part of future communications campaigns.</p>
<p>Materials should be translated and there should be appropriate education and communication for culturally and linguistically diverse communities, including a transparent complaints process.</p>	<p>CCNSW will work with Multicultural NSW to determine how best to support the diverse communities of NSW.</p>

Theme	How CCNSW is responding
CCNSW should work with community representatives and groups to share information about rights and options.	CCNSW will work closely with the Community and Consumer Consultative Group, an advisory group appointed by the board, to deliver the best outcomes for the public.

## Broader feedback

During consultation, CCNSW received broad feedback about the scheme and the interment sector.

Some issues raised were out of scope for this reform (see Table 6) but will be considered by CCNSW as part of its future work planning.

Table 6. Issues currently out of scope

Issue raised	CCNSW response
More information should be provided on alternative funeral and burial/cremation options, including sustainable burials.	CCNSW is working on a range of fact sheets to support greater consumer awareness of the available options.
Renewable tenure should be discussed.	Renewable tenure is permitted in NSW but has not been strongly adopted. CCNSW will look at doing more to promote renewable tenure in the future.
Cemeteries should create an online databases of plots including photographs.	Many cemetery operators now have these online options. This may not be feasible for smaller operators.
There should not be additional fees for religious requirements.	Where requirements represent a cost to the operator, it is appropriate for these costs to be passed on to the customer. The pricing transparency requirements, along with Principle 4, will require any such fees to be clearly explained (for example, that the fee is to cover additional staff costs).

## Feedback on Aboriginal cultural and spiritual principles and guidelines

A CCNSW project officer spoke with approximately 60 people in stakeholder bodies and in communities during the consultation period.

Talking with Elders and knowledge keepers on Country proved invaluable in developing a deeper understanding of Aboriginal community needs. Being able to speak with smaller groups about a sensitive subject provided the right balance between information gathering and sharing.

Key Aboriginal stakeholder groups were supportive of the inclusion of the Aboriginal cultural and spiritual principles.

Key themes from these consultations were that:

- there is a need for greater cultural understanding
- there is a high sensitivity to costs, which are burdensome

- there are a range of cultural needs relating to burial and cremation
- Sorry Business is often not well understood or respected
- Aboriginal burial space within cemeteries, or Aboriginal-run cemeteries, is an area of interest
- there is confusion between the role of the funeral director and the role of the cemetery operator.

These themes are being addressed through the development of guidelines for operators on key Aboriginal cultural and spiritual requirements, which will help operators comply with the Aboriginal cultural and spiritual principles in the licence conditions.

CCNSW is also producing fact sheets to help Aboriginal and broader community members understand the respective roles of the funeral director and the cemetery operator, as well as the role that CCNSW plays in addressing any complaints.

CCNSW will continue to engage with Aboriginal communities and key stakeholders across NSW to develop guidelines that ensure Aboriginal requirements are respected in burial and cremation services.



# Implementing the scheme

The Interment Industry Scheme commenced with the proclamation of the Cemeteries and Crematoria Amendment Regulation 2022 on 21 October 2022. The licence conditions for cemetery and crematoria operators were approved by the CCNSW Board on 12 September 2022.

The scheme will be implemented in phases until October 2024, by which time all operators must be licenced and compliant with requirements.

This period will include the phased release of explanatory material for operators on how to apply for a licence and prepare to meet the incoming licence conditions, as well as the release of template documents.

During this phase CCNSW will also work with cemetery and crematorium operators, funeral directors, the community and other interested stakeholders to ensure they understand the changes and what is expected from cemetery and crematorium operators.

For more information on the Scheme and the planned implementation and transition, please visit the [Interment Industry Scheme page of our website](#)

# Appendix 1 – Changes made to the scheme following consultation

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## Overall licensing scheme and categories

### Implementation costs

Table 7. Feedback on implementation costs

Feedback received	Change made in response
Costs could be significant for operators to implement reforms. Operator costs could lead to increases in the costs of burial.	Clarification of fee policy (to be published on CCNSW website) – the fee will be \$800 as per the regulation, but smaller operators (Category 3) will pay a reduced fee of \$400. Financial hardship provisions will also be available for operators to apply for a fee waiver. The fee will be waived for Category 4 operators. Help will be available for operators to minimise implementation costs, with additional explanatory materials and templates under development.

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## Condition-specific issues

### A – Consumer contracts

Table 8. Feedback on consumer contracts

Feedback received	Change made in response to the conditions
Contracts are often signed by the funeral director not the operator – it was unclear how conditions would apply.	Move the agreement statement from A3 (Category 1 and 2 operators only) to A2 (all active operators). The agreement statement is between the Customer and the Operator - the Operator must declare that terms and conditions have been explained to the Customer, and that they have given them time and privacy to consider the contract. The Customer must declare that these things have occurred. Where a funeral director is acting as the authorised agent of an Operator, they will need to make this declaration.
Contracts need to specify that graves/monuments will be maintained in accordance with any relevant religious or cultural requirements.	Amend A.3.2 to include that maintenance of a grave or monument should be done in accordance with religious or cultural requirements.

Feedback received	Change made in response to the conditions
The fees and charges in the contract should be more easily comparable to the price breakdown for the basic products.	Align the fees and charges listed at A.2.3 to use the same terminology and breakdown as the pricing transparency template. This should avoid confusion for both consumers and operators.  The proposed breakdowns will be further tested with operators and can be amended if needed.
Pre-paid cremation services should be covered.	Include cremation-only services in both the contract and the pricing transparency requirements, recognising that this is a common interment service type.

## B – Cemetery maintenance

Table 9. Feedback on cemetery maintenance

Feedback received	Change made in response
Requiring public access during daylight hours may not always be feasible. There may be WHS matters that make this unsafe, for example recent wet weather precluded access to some cemeteries or certain areas within a cemetery.	Amend condition B.1 to clarify that public access is not required if the operator has reasonable grounds to believe it is unsafe to allow access.
Maintenance schedules (B.2) should be updated every 2 years rather than annually.	Amend B.2 to require that the maintenance schedule is updated every year, unless otherwise advised by the regulator. This means for smaller Category 1 operators we could require it every 2 years (as specified in the licence when issued).  Amend B.4 to be consistent and to align with the new expanded Category 1, with the self-assessment checklist now required to be updated every year unless otherwise advised by the regulator. Similarly, for smaller Category 1 operators we would be able to require it every 2 years.
The SEPP on Advertising and Signage referred to in B.5.9.a does not apply to private operators on private land.	Remove the reference to the SEPP in B.5.9.A – the standard was simplified to require signs to be clearly visible, and not create a physical obstruction or hazard.

## C – Pricing transparency

Table 10. Feedback on pricing transparency

Feedback received	Change made in response
Pre-paid cremation services should be covered.	<p>Include a Basic Cremation alongside a Basic Adult Burial and a Basic Ash Interment to recognise that this is a common type of interment service.</p> <p>To complement the inclusion in the contracts' requirements, a standardised Basic Cremation/Cremation-Only product will also be required. The pricing template for this service will be developed by CCNSW in consultation with crematoria operators.</p>
The pricing breakdown template requires some clarification.	<p>Changes to the template include:</p> <ul style="list-style-type: none"> <li>• clarification of whether maintenance or perpetual maintenance should be included in the template</li> <li>• removal of exhumation as a line item – this would not be a common inclusion in an interment rights contract</li> <li>• separating out the grant of the interment right out from the other administration fees.</li> </ul>

## D – Customer Service

Table 11. Feedback on customer service

Feedback received	Change made in response to conditions
People interacting with faith communities should familiarise themselves with the requirements of those communities and interact with members in a manner respectful of that faith	Amend D.2 to include a requirement to train staff on how to familiarise themselves with cultural and religious requirements and act in a manner respectful of culture and faith.
Need to define an ancillary provider in D.3.2.	Define 'ancillary provider' in licence conditions someone who provides goods and/or services related to the interment services provided by the operator (including but not limited to gravediggers and memorial masons).

## E – Religious, cultural and spiritual principles

Table 12. Feedback on religious, cultural and spiritual principles

Feedback received	Change made in response to conditions
<p>Principle 4 could be open to exploitation.</p> <p>It is difficult to delineate a religious requirement from a cultural requirement or a religious preference.</p> <p>There will be a significant regulatory cost to establishing the actual cost to deliver a requirement.</p> <p>It is inappropriate to restrict commercial operators from applying a margin – moving deeper into price regulation and cost-reflective pricing.</p> <p>The requirements curtail an operator’s ability to manage their own operations, for example to cross-subsidise different products.</p> <p>You cannot compare ‘like for like’ as the cost to deliver a particular requirement will vary between operators depending on how they do it.</p>	<p>Amend Principle 4 (E.1.4 and E.2.4) to refer to explaining the basis for any charges to meet religious, cultural and spiritual requirements, and itemising these, rather than the previous requirement to charge actual costs.</p> <p>CCNSW plan to focus on the costs being charged to deliver such requirements and take stronger regulatory action if necessary.</p>

## F – Reporting obligations

Table 13. Feedback on reporting obligations

Feedback received	Change made in response to conditions
<p>It is not workable to be required to report any change to significant shareholders for a listed company (as per F.1.3)</p>	<p>Change F.1.3 to require notification of a change in the majority stakeholder rather than a significant stakeholder.</p>

## G – Prohibition of interment

Table 14. Feedback on prohibition of interment

Feedback received	Change made in response to conditions
<p>A caretaker operator should be able to perform an occasional interment without being required to get a Category 3 licence.</p>	<p>Amend Condition G to include an additional rationale for a caretaker operator to perform an interment.</p>
<p>The regulatory burden for small operators is prohibitive</p>	<p>Rather than notifying CCNSW prior to an interment, a caretaker operator now has up to 5 business days after the interment to notify CCNSW.</p>

# Appendix 2 – Overview of extended transition period

Operators must apply for a licence in 5 intake groups from 1 July 2023 to 30 September 2024, as indicated in Table 15.

Licence conditions will switch on in 3 stages, as indicated in Table 16.

Depending on the timing of the licence application and approval by CCNSW, certain conditions may apply on commencement or be attached to the licence with a set commencement date.

CCNSW will begin full proactive compliance from 1 October 2024 at the end of the transition period.

Table 15. Timeline for licensing intake groups

Licensing intake group	Detail	When
1	Greater than 200 interments plus cremation only	July– September 2023
2	50 to 199 interments	October – December 2023
3	5 to 49 interments	January - March 2024
4	1 to 4 interments	April - June 2024
5	0 interments/caretaker	July - September 2024

Table 16. Commencement of conditions

Stage	Detail	When
1	Contracts, customer service, reporting	October 2023
2	Religious, cultural and spiritual principles Aboriginal cultural and spiritual principles	February 2024
3	Pricing transparency, maintenance	July 2024



Table 17. Visual timeline of extended transition period

	2022			2023												2024												
	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	J	F	M	A	M	J	J	A	S	O	N	D	
Overall transition for licensing	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█	█
Licensing intake group 1 - ≥ 200 interment + crematoria only										█	█	█																
Licensing intake group 2 - 50 -199 interments													█	█	█													
Licensing intake group 3 - 5 - 49 interments																█	█	█										
Licensing intake group 4 - 1-4 interments																			█	█	█							
Licensing intake group 5 - 0 interments / caretaker																							█	█	█			
Commencement of stage 1 conditions - contracts, customer service, reporting													█															
Commencement of stage 2 conditions - principles																	█											
Commencement of stage 3 conditions - pricing transparency, maintenance																							█					
Full compliance required																										█	█	█