



Guide to Licence Conditions C: Pricing Transparency

May 2025



Acknowledgement of Country

Cemeteries & Crematoria NSW acknowledges that it stands on Aboriginal land. We acknowledge the Traditional Custodians of the land and we 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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Guide to Licence Conditions C: Pricing Transparency

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Introduction

The Interment Industry Scheme

The Interment Industry Scheme was established under the Cemeteries and Crematoria Regulation 2022 (NSW). The scheme was developed in response to recommendations from two 2020 reviews:

- a statutory review of the *Cemeteries and Crematoria Act 2013* (NSW)
- the Independent Pricing and Regulatory Tribunal (IPART) review of interment costs and pricing in NSW.

Both reports recommended improving transparency of pricing through the use of itemised pricing templates to assist customers understand their interment options, and in turn increasing competition within the NSW interment sector.

Under the scheme's licensing framework, NSW cemetery and crematoria operators must hold a licence to perform interment services, including burials, cremations, ash interments and caretaker services.

There are 4 licence categories, each with different conditions that operators must meet. For more information on the application of licence categories see our [Cemetery Operator Licence Categorisation Policy](#). The Conditions will be reviewed by Cemeteries & Crematoria NSW (CCNSW) periodically.

This guide

The aim of this guide is to help operators understand how to meet licence conditions C.1 and C.2 which relate to pricing transparency. Operators should read this guide alongside the [licence conditions](#).

The guide introduces the conditions, provides information to assist operators in understanding the conditions, describes how to show compliance with the conditions and introduces related resources (the approved price breakdown format, and the price breakdown tool).

Note on terms

In this guide, 'we' and 'our' refers to CCNSW. 'you' and 'your' refers to operators. The terms 'consumer' and 'customer' have the same meaning.

Introducing the conditions

This section gives essential contextual information including:

- the application of the Condition and principles
- the Price Breakdown Formats
- relevance of other related legislation

Related support materials are introduced in the Additional Resources section.

Licensing conditions for pricing transparency

There are 2 licensing conditions relating to pricing transparency. These are known as conditions C:

- C.1 - Operator must make a price breakdown of the Basic Adult Burial, Basic Ash Interment and/or Basic Cremation publicly available
- C.2 - Operator must publish prices for all of their available interment services on their website or at their place of business if they do not maintain a website

Important note:

When we consider which activities are reasonable for operators to undertake to comply with each principle, we will take into account:

- the operator's circumstances, size and nature
- the needs and characteristics of the community it services

The table below shows that Conditions C apply to Category 1 and 2 operators only.

Licence category	C.1	C.2
1	✓	✓
2	✓	✓
3	–	–
4	–	–

Price Breakdown Format

Price breakdown information required under Licence Conditions C Pricing transparency **must be provided in the approved format**.

The approved format for these price breakdown templates are listed below and are available on the CCNSW [website](#):

- Operator Price Breakdown Format - Basic Adult Burial
- Operator Price Breakdown Format - Basic Ash Interment
- Operator Price Breakdown Format - Basic Cremation

It is **mandatory** to use the approved formats. Operators may make style changes only, such as adding their branding to the approved formats.

If you provide more than one of these service types, then a price breakdown will need to be made available for each.

Each format has sections with standardised sections (price breakdown elements) and explanations for the customer. If a particular component is not relevant to your price structure, you must still include it in the format but mark it n/a and explain why that component is not itemised – i.e. each element in the format must be included

More information about the format is included in the Additional Resources section.

Goods and Services Tax (GST)

The price breakdown formats allow operators to display prices either including or excluding GST, recognising that GST may apply to certain aspects of an interment service price and not others.

Use the GST inclusive column for the components where GST is applicable.

Operators are responsible for seeking their own advice on the application of GST to their products and services.

Australian Consumer Law

The Australian Competition and Consumer Commission also plays a role in price regulation in Australia, through the Australian Consumer Law. Businesses are required to display clear and accurate prices, and not mislead consumers about their prices. Both NSW Fair Trading and the Australian Competition and Consumer Commission regulate the Australian Consumer Law in NSW.

For more information about these requirements, visit the ACCC website - <https://www.accc.gov.au/business/pricing>.

Understanding the conditions

C.1 – Price breakdowns of basic products

Condition C.1 - Operator must make a price breakdown of the Basic Adult Burial, Basic Ash Interment and/or Basic Cremation publicly available

What condition C.1 means

This condition means that you must identify your basic interment services, and explain the price breakdown of those services to customers in the approved format (the relevant Operator Price Breakdown Format). This will build customer awareness about the component costs that contribute to the price of an interment and make it easier for customers to compare prices between operators.

‘Basic services’ are **the lowest price option an operator provides** within the ‘basic service’ definitions below.

The pricing transparency licence conditions refer to three basic services:

1. **Basic Adult Burial**– the least expensive bodily interment service that is available for a Customer to purchase from the Operator - i.e. where there is a **bodily interment or placement** in a grave or built structure
2. **Basic Ash Interment** – the least expensive ash interment service that is available for a Customer to purchase from the Operator - i.e. where there is an **interment or placement of ashes** in a grave or built structure
3. **Basic Cremation** – the least expensive cremation only service available for a Customer to purchase from an Operator – i.e. where only **cremation** is provided and there is no interment component.

Note regarding approved formats for Operator Price Breakdown e.g. Basic Adult Burial

The price information for the basic interment services **must be provided in the approved Operator Price Breakdown format** (with branding changes only) and made available at each place of business of the Operator or in another manner approved in writing by the Cemeteries Agency.

The approved formats for these price breakdowns are available on the [CCNSW website](#):

- Operator Price Breakdown Format - Basic Adult Burial
- Operator Price Breakdown Format - Basic Ash Interment
- Operator Price Breakdown Format - Basic Cremation

If you provide more than one of these service types, then a price breakdown will need to be made available for each.

Note regarding basic services (lowest price option)

The licence conditions **do not** require operators to create a new interment service product. For example, if a cemetery operator only offers a basic ash interment and not burials, then only that lowest ash interment cost option must be provided using the pricing transparency templates.

A price breakdown does not have to be provided for a service that is only temporarily an Operators' lowest priced service due to a short-term promotion.

How to comply with condition C.1

There are a series of key steps to demonstrating compliance:

1. Identify the basic (lowest price option) interment services that you offer.
2. Complete the relevant operator price breakdown formats for those basic services.
 - A tool is available to assist operators in better understanding the costs of their cemeteries/crematoria to support completing the price breakdown formats. See further information below in the Resources section on how to use the tool. Use of this tool optional, **not** mandatory.
 - Where an element of the pricing breakdown does not apply, for example, is not offered by an operator, it must be marked as not applicable.
 - Operators may include additional information in the template, for example, a discount.
3. Be prepared to be able to provide your operator price breakdown for your basic service to CCNSW on request.
4. Provide your operator price breakdowns at your place of business and on your website (if you have one).

-
- Provide the information in a place and a format that's easy for customers to access and understand.

C.2 – Publish prices for all available interment services

Condition C.2 - Operator must publish prices for all of their available interment services on their website or at their place of business if they do not maintain a website

What condition C.2 means

Condition C.2 complements condition C.1, by expanding transparency from the basic interment services to all available interment services.

These prices **are not** required to be published in the itemised operator price breakdown format (though for Category 1 operators the price must be broken down in a similar way in each individual contract as per Condition A.3).

This condition relates to interment services – burials, ash interments and cremations. This condition does not apply to other services such as flowers, catering and function centre use.

How to comply with C.2

Provide your complete interment services price list at your place of business and on your website (if you have one).

Provide the information in a place and a format that's easy for customers to access and understand.

Showing compliance

Compliance strategies

In this section, we share some tips about how you can show compliance with conditions C.

Make it easy for customers to find your prices

Your licence conditions require you to display your basic services in the approved operator price breakdown format, as well as a full price list for interment services. These prices should be easy for your customers to find. If they are easy to find on your website, and/or at your place of business, it will make it easy for us to monitor your compliance with these licence conditions.

Support customers to understand your pricing

To ensure customers are aware of the basic services you provide before signing a contract with you, you could include the information with any early materials you provide and discuss with customers.

Offer training to staff

Provide training and support for staff on these licence conditions.

Our compliance approach

CCNSW will monitor Operators' compliance with the Conditions. For more information on CCNSW's compliance approach see its [Regulatory Framework](#).

We believe in working with you to help you understand your compliance obligations and improve industry practices. If we identify non-compliance, we may take regulatory action to enforce compliance where appropriate.

When preparing to engage with us to show compliance with conditions C.1 and C.2, you should have relevant documentation available and be prepared to answer questions relating to compliance with the conditions.

When we consider which activities are reasonable for operators to undertake, we will take into account:

- the operator's circumstances, size and nature
- the needs and characteristics of the communities it services.

Additional resources

Understanding your costs to facilitate publishing price breakdowns

Understanding your operational costs is important to be able to determine and explain the price of the products and services you provide, and for general business planning.

The cost to provide a service may be the same, higher or lower than the price charged to customers. If the cost is higher than the price, that means that you are providing a discount. A discount can be shown to customers in a price breakdown.

To support operators to meet the pricing transparency licence conditions, an Excel tool (called the *CCNSW cost breakdown tool for cemetery and crematoria operators*) is available on the CCNSW website for operators to help identify and quantify the costs of the products and services provided to customers. The tool allows you to input your raw costs, and align those costs with the key elements of the price breakdown format. The price breakdown format does not require you to align your prices to precisely match your costs, but understanding your costs should help you to understand how your prices can be broken down most accurately.

This is an **optional resource**. You are not required to use this tool. The information used to complete the tool and the calculations the tool provides are **not** required to be provided to customers.

Using the cost breakdown tool

A tool (Excel document) is available to assist Operators on how to identify and measure costs needed to meet the pricing transparency licence conditions. The tool can also be used by Operators to cost (and help to price) individual product types as required under Conditions A (Consumer contracts) for Category 1 and 2 operators.

After inputting the different costs associated with each of the basic services, the tool will then automatically populate your costs into the appropriate sections of the relevant Operator Price Breakdown Format that can be used to create the pricing breakdown provided to customers.

Contact Cemeteries & Crematoria NSW to obtain the cost breakdown tool.

Using the Operator Price Breakdown Formats

The price breakdown formats allow you to specify what specific inclusions there are for each price element, or to mark a component as n/a if it is not relevant for your pricing.

Examples of each operator price breakdown format are provided in the appendices at the end of this document to show the types of costs that might be included.

Appendices

Appendix 1 – Price breakdown format example for a Basic Adult Burial

This price breakdown format example uses figures from a fictional operator.

This price breakdown for the Basic Adult Burial is presented in the format approved by the regulator, as per Condition C.1 of the licence conditions for cemetery operators.

In line with the approved format, all prescribed elements of the price breakdown must be shown in the table, with those that do not apply in our circumstances marked as not applicable. This price breakdown does not include any products or services not provided by the cemetery operators, such as the costs of the funeral director.

Price Breakdown Element	Description of this Element	Operator Specific Information (if relevant)	Price (GST applicable element, includes GST)	Price (GST not applicable, excludes GST)
Right to inter (bury) bodily remains in a particular location in a cemetery				
Administration – Interment right	Preparation of key documentation and associated activities to issue an interment right (the right to be buried in a particular location) including: <ul style="list-style-type: none">- Consumer Contract- Interment Right Certificate	Also includes time spent with the customer to choose a specific burial site	-	\$1,000
Land value	Relevant proportion of the cost of purchasing land for the cemetery	Cemetery purchased in 1890 – no land value reflected in pricing.	n/a	n/a

Site development	Relevant proportion of the cost of developing land for the cemetery, or the specific area of the cemetery (<i>Applies to new cemetery development only</i>).	Basic Adult Burials are in the Blossom Lawn section of the cemetery which was developed in 2022 and contains 2000 sites.	-	\$200
Maintenance	Share of cost of activities required to maintain the site and the cemetery. Operator to specify whether perpetual maintenance (future) is included.	Includes maintenance and perpetual maintenance	\$550	
Sub-Total			\$550	\$1200
Burial or placement of bodily remains in grave or built structure				
Burial, or Placement	Burial of bodily remains in the ground, including excavation (digging a grave to the appropriate size and depth) and landscaping the site after burial, or Placement of bodily remains elsewhere than in the ground (e.g. crypt, mausoleum).	Excavation of grave site Burial Filling of grave Topping up and turfing of grave	\$2,200	
Administration - Burial	Administrative costs associated with the burial for example issuing the Order for Interment (required to confirm all details correct before burial occurs)	Order for Interment		\$100
Sub-Total			\$2200	\$100
Memorial (if applicable)				
Plaque, monument, headstone, garden or other item installed on a site to commemorate	Engraving and/or placement of a memorial	Not applicable – memorials not provided by operator. They are provided by a third-party stonemason, who must be registered by the operator.	-	-

or identify				
Religious, Cultural or Spiritual (if applicable)				
Religious, cultural or spiritual requirements	Details of religious, cultural or spiritual requirements included and an explanation of the components of the price. For example, interment within 24 hours requiring staff overtime, backfill by hand requiring additional labour.	Not applicable – requirements are provided as requested, none included in basic product	-	-
Additional fees, services or products (if applicable)				
Items or components that are not included in the above sections e.g. flowers, chapel hire, catering	Each component should be clearly itemised, and details provided. Includes any additional fees for example if an 'Out of Area' fee is applied by council operators to customers residing outside of the council area.	Not applicable	-	--
Discounts (if applicable)				
Discounts	For example, if a discount is offered to local ratepayers by council operators.	Not applicable	-	-
			GST applicable subtotal	GST not applicable subtotal
			\$2750	\$1300
Total price for Basic Adult Burial (including GST where it is applicable)				\$4050

Appendix 2 – Price breakdown format example for a Basic Ash Interment

This price breakdown format example uses figures from a fictional operator.

This price breakdown for the Basic Ash Interment is presented in the format approved by the regulator, as per Condition C.1 of the licence conditions for cemetery operators.

In line with the approved format, all prescribed elements of the price breakdown must be shown in the table, with those that do not apply in our circumstances marked as not applicable. This price breakdown does not include any products or services not provided by the cemetery operators, such as the costs of the funeral director.

Price Breakdown Element	Description of this Element	Operator Specific Information (if relevant)	Price (GST applicable element, includes GST)	Price (GST not applicable, excludes GST)
Right to inter (place) ashes in a particular location in a cemetery				
Administration – Interment right	Preparation of key documentation and associated activities to issue an interment right (the right to place (inter) ashes in a particular location) including: - Consumer Contract - Interment Right Certificate	Also includes time spent with the customer to choose a specific site	-	\$1,000
Land value	Relevant proportion of the cost of purchasing land for the cemetery	Cemetery purchased in 1890 – no land value reflected in pricing.	n/a	n/a
Site development	Relevant proportion of the cost of developing land for the cemetery, or the specific area of the cemetery (<i>Applies to new cemetery development only</i>).	Basic Ash Interments are placed into a niche the Cherry Tree Wall section of the cemetery which was developed in 2015 – no development costs included in the price.	-	n/a

Maintenance	Share of cost of activities required to maintain the site and the cemetery. Operator to specify whether perpetual maintenance (future) is included.	Includes maintenance and perpetual maintenance of the niche wall	\$330	-
Sub-Total			\$330	\$1000
Placement of ashes				
Placement of ashes	Placement of ashes in the ground or another structure (such as a columbarium or niche wall)	Excavation of grave site Burial Filling of grave Topping up and turfing of grave	\$550	-
Administration – Placement	Administrative costs associated with the placement of the ashes for example issuing the Order for Interment (required to confirm all details correct before any placement occurs)	Order for Interment	-	\$100
Sub-Total			\$550	\$100
Cremation (if applicable)				
Cremation	Cost of cremation, if included in the Basic Ash Interment	Not applicable – cremation is a separate service, not part of the Basic Ash Interment.	n/a	n/a
Administration – Cremation	Administrative costs or fees associated with the cremation, including any mortuary storage costs or transportation costs that apply.	Not applicable.	n/a	n/a

Memorial (if applicable)				
Memorial plaque, garden or other item installed on a site to commemorate or identify	Engraving and/or placement of a memorial	Not applicable – memorials not provided by operator. They are provided by a third party, who must be registered by the operator.	n/a	n/a
Religious, Cultural or Spiritual (if applicable)				
Religious, cultural or spiritual requirements	Details of religious, cultural or spiritual requirements included and an explanation of the components of the price. For example, witness insertion costs.	Not applicable – requirements are provided as requested, none included in basic product	n/a	n/a
Additional fees, services or products (if applicable)				
Items or components that are not included in the above sections e.g. flowers, chapel hire, catering	Each component should be clearly itemised, and details provided. Includes any additional fees for example if an 'Out of Area' fee is applied by council operators to customers residing outside of the council area.	Not applicable	n/a	n/a
Discounts (if applicable)				
Discounts	For example, if a discount is offered to local ratepayers by council operators.	Not applicable	n/a	n/a
			GST applicable subtotal	GST not applicable subtotal

	\$880	\$100
Total price for Basic Ash Interment (including GST where it is applicable)		\$980

Appendix 3 – Price breakdown format example for a Basic Cremation

This price breakdown format example uses figures from a fictional operator.

This price breakdown for the Basic Cremation is presented in the format approved by the regulator, as per Condition C.1 of the licence conditions for cemetery operators.

In line with the approved format, all prescribed elements of the price breakdown must be shown in the table, with those that do not apply in our circumstances marked as not applicable. This price breakdown does not include any products or services not provided by the cemetery or crematorium operators, such as the costs of the funeral director.

Price Breakdown Element	Description of this Element	Operator Specific Information (if relevant)	Price (GST applicable element, includes GST)	Price (GST not applicable, excludes GST)
Collection and storage				
Collection and transportation	Collection and transportation of the deceased to the crematorium, if provided by the operator.	Not applicable – provided by funeral director.	n/a	n/a
Storage	Storage of the deceased in mortuary or holding room	Holding costs of \$100 per day apply – for a Basic Cremation, there is usually no storage inclusion.	n/a	n/a
Sub-Total			\$0	\$0
Administration				
Administrative costs of the cremation	Administrative processes required before a cremation such as validation of the death certificate and other legal requirements.	Validation of information provided by funeral director.	\$220	-

Cremation				
Preparation	General activities required to prepare for a cremation		\$110	-
Cremation	Costs of cremation, including the costs of gas or other fuel Any costs required to prepare the ashes for collection	Gas the main cost for cremation Preparing ashes requires staff time	\$440	-
Urn or vessel to contain ashes	Any vessel provided to store and return ashes	Ashes provided in a Styrofoam container – no	n/a	n/a
Sub-Total			\$550	-
Religious, Cultural or Spiritual (if applicable)				
Religious, cultural or spiritual requirements	Details of religious, cultural or spiritual requirements included and an explanation of the components of the price. For example, witness insertion costs.	Not applicable – requirements are provided as requested, none included in basic product	n/a	n/a
Additional fees, services or products (if applicable)				
Items or components that are not included in the above sections e.g. flowers, chapel hire, catering	Each component should be clearly itemised, and details provided. Includes any additional fees, for example, if an 'Out of Area' fee is applied by council operators to customers residing outside of the council area.	Not applicable	n/a	n/a
Discounts (if applicable)				
Discounts	For example, if a discount is offered to local ratepayers by	Not applicable	n/a	n/a

	council operators.			
			GST applicable subtotal	GST not applicable subtotal
			\$770	\$0
Total price for Basic Cremation (including GST where it is applicable)				\$770