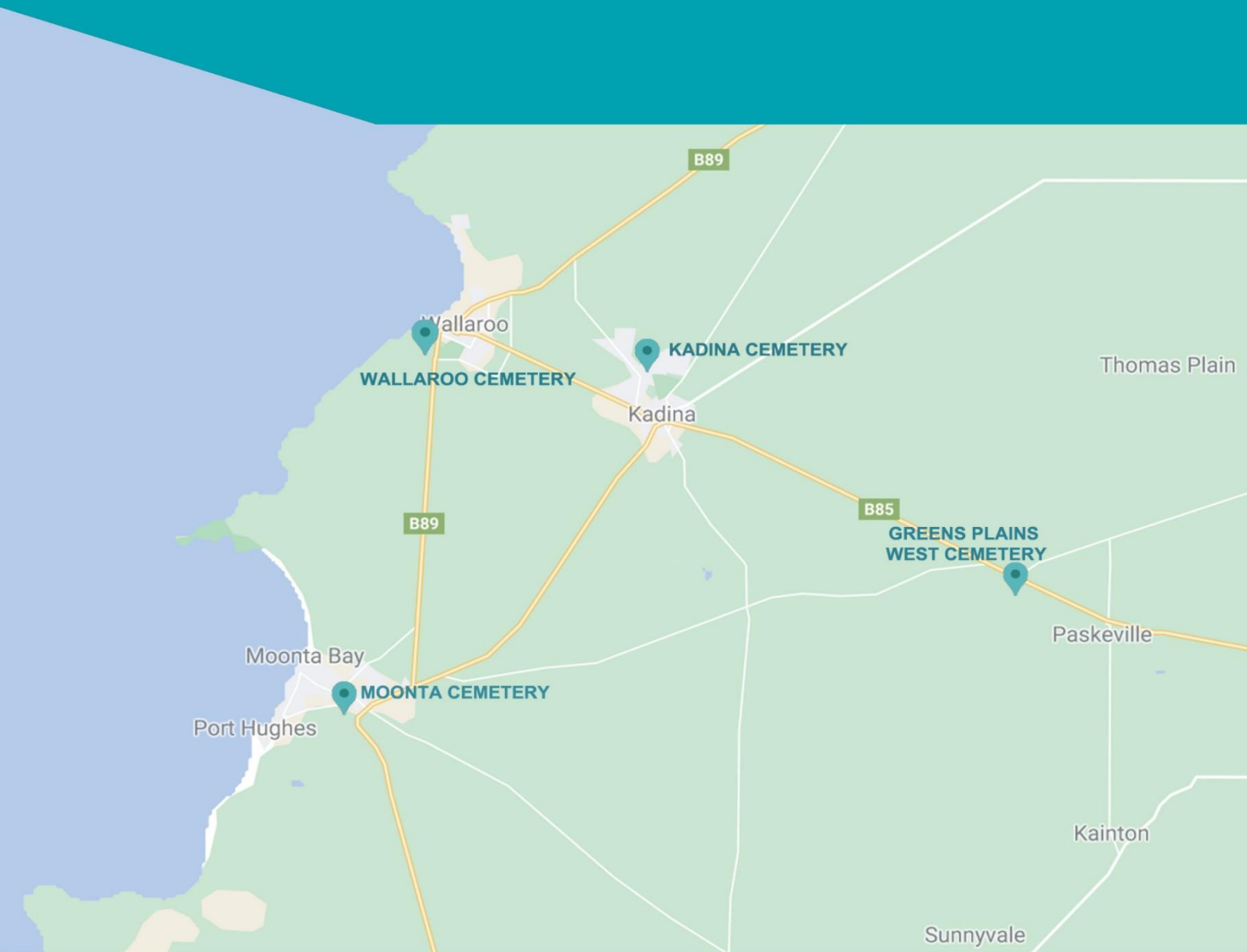


CEMETERY MANAGEMENT PLAN

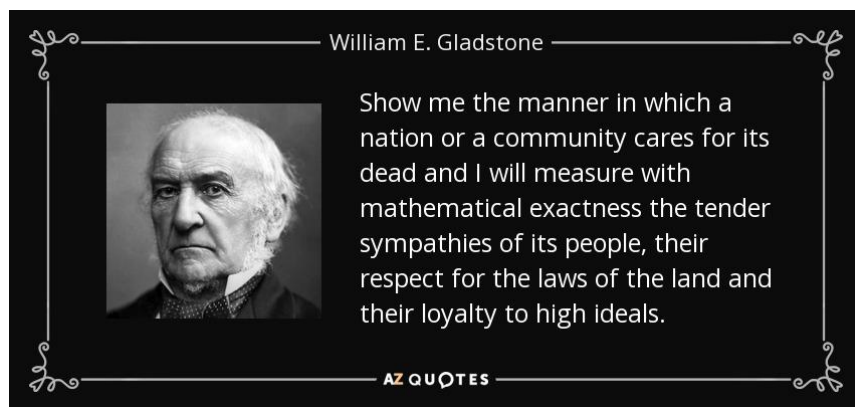
FOR THE COPPER COAST



changing
P L A C E S

report prepared for:





William Ewart Gladstone served as Prime Minister of Great Britain on four separate occasions, starting in December of 1868, during the reign of Queen Victoria.

Cemetery Management Plan for the Copper Coast

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Scope

Being mindful of the need to balance its community service obligations with appropriately conducting the business of supplying services related to the disposition of bodily remains and related memorialisation, the Copper Coast Council (CCC) engaged Changing Places to develop individual Cemetery Management Plans for each of its four cemeteries.

Commentary on amenity, landscaping and the condition of the cemetery, graves, monuments and other buildings, was to include a general description along with more detail in relation to the key factors in need of attention, along with suggested rectification actions. Related costings will be developed with CCC staff, rather than by engaging third party consultants.

Each of the four individual site reports plans should be read in conjunction with this report. It addresses the overall issues, rather than repeating specific site details.

The engagement was awarded in February 2020. Implementation was delayed until 2021 by COVID travel restrictions.

References

In addition to stakeholder responses to inquiries, key references were

- Cemetery Management Policy (5 May 2020)
- Copper Brought Them Here Volume One (April 2017 Revision)
- Dressing the Graves 2019
- The Copper Coast Council web site
- Yorke Peninsula Heritage Survey 1997

Process

Prior to preparing this report, consultations took place with a variety of stakeholders (see **Appendix A**). Some related council records and documents were reviewed. The desk top review material was considered in conjunction with observations made during the site visit and the responses received in relation to subsequent inquiries.

Since its appointment to conduct this review, Changing Places has

- visited the area for three days in February 2021
- attended a meeting of the Cemeteries Working Party
- conducted face to face interviews with a variety of internal stakeholders
- discussed matters with CCC's two main client funeral directors and a local monumental mason
- gained general insight into SA cemetery operating environments from representatives of the Adelaide Cemeteries Authority and CCASA
- clarified matters as necessary with internal and external stakeholders
- prepared and submitted a draft of this report and responded to feedback.

All the stakeholders were most helpful. Significant assistance was received from Andrea Thomas, Katrina Borlace and Matthew Rose. Substantial insights into local history were provided by Robyn Knight and Liz Coole. Whilst all their input was appreciated, Changing Places remains responsible for the content of this report.

Executive summary

Rather than seeing the cemeteries as a potentially self-funding, commercial activity, CCC recognises them as being 'public goods' ie appropriately funded from CCC ratepayer revenue. That is not to say that cemetery goods and services will be free of charge. Whilst it is reasonable to expect that the fees will make a significant contribution towards current costs, it is not equitable to expect current client families to meet the accumulated historic, perpetual site maintenance obligations.

The fact that the provision of cemetery services is regarded as a community obligation rather than a commercial activity, is not a reason to deprive the community of access to a reasonable range of interment opportunities. The current product mix reflects past, not best practice. It also fails to recognise the apparent trend towards cremation.

Council is responsible for the overall site maintenance and infrastructure, safety, record keeping, conduct of interments, determining the range of acceptable memorial formats and controlling memorial installations.

It has an obligation to protect its Heritage listed assets and to diminish the risk of damage to monuments, caused by tree root penetration. That responsibility is quite separate to the question of repairing existing and at times significantly deteriorating monuments. Whilst the monuments are of concern, it is not the Council's responsibility to repair them. That lies with the descendants of the historic holders of the burial licences.

All four sites are well presented, neat and tidy. There were aspects of each that warranted ongoing attention. Overall, there appears to be no framework in place for regular site inspections. Maintenance is on a 'find and fix' basis. Cemetery gardens do not appear to receive the equivalent attention as their public garden equivalents.

Monument applications have an approval process but no accompanying site checks to ensure compliance. The web site contains good information about the issues with historic records but does little to educate the public about site history, fees, available products and services.

Appointing one person to be responsible on a day to day basis for oversight of the sites and their operational effectiveness, should significantly diminish the ongoing issues

Records are well kept but insufficiently supported by IT systems eg for plot mapping. In the apparent absence of a suitable Synergy application, investigation of simple specialist cemetery software is warranted. Landscape masterplanning is also required to ensure efficient utilisation of space and recognition of historic site attributes.

It is impossible not to recognise the significance of the activities associated with the Copper Coast Cornish Festival. It is a significant tourism event and prompts considerable focus upon the cemeteries. Having simpler maps available on the web site and within the cemetery, would assist community and visitors during the Kernewek Lowender Festival. Whilst all four sites currently retain their historic but different approaches to numbering rows, pathways and plots, that should not continue. A consistent approach across the sites for new rows and sections is warranted.

Similarly there is considerable scope to utilise the web site not only to provide insights into cemetery histories but also to enlighten the community about available bodily and cremated remains interment offerings. In turn, erection of clear signage within all CCC sites would assist mourners, genealogists, Kernewek Lowender participants and the community in general.

In the face of a clearly defined aggregate reduction in the proportion of human remains disposition by burial compared to cremation, the challenge will be to satisfactorily provide for the community's cremated remains memorialisation needs. Failing to do so will see increasing reliance upon ratepayer funds to support current interment activity.

The existing product mix and fees really do not recognise that family tastes, incomes and preferences vary. The approaches suggested in this report require little investment but will better satisfy the client families and help to fund cemetery operations and perpetual maintenance. Particular site details are dealt with, in their individual reports.

As a progressive council, concerned to ensure that its community obligations are adequately addressed, CCC needs to consider a proactive strategic approach. Given its finite resources, the challenge is to sharpen its operational focus and to expand its product range, without incurring unrecoverable costs.

List of Recommendations

These recommendations are listed in the order within which they appear, following the sequence of the report.

Recommendation One (Page 9)

That consideration be given to issuing all interment rights in perpetuity but subject to a clear requirement that they be exercised within 50 years (if not they revert to Council).

Recommendation Two (Page 11)

That two years supply of graves be plotted progressively for each site.

Recommendation Three (Page 11)

That landscape masterplanning be undertaken for new sections at Kadina and Moonta and for the whole sites at Wallaroo and Greens Plains West.

Recommendation Four (Page 11)

That consideration be given to the utilisation of Synergy or simple specialist cemetery software, to map additions to existing sections and or import external data.

Recommendation Five (Page 13)

That consideration be given to designating a person as being responsible for managing cemetery operations.

Recommendation Six (Page 14)

That toilet facilities be included within the Greens Plains West development plan.

Recommendation Seven (Page 15)

That each site has signage to show the location at least of internal roads, religious sections, rows and toilets..

Recommendation Eight (Page 16)

That CCC implement a consistent approach to designating new sections, rows and plots within its sites.

Recommendation Nine (Page 17)

That the web site be used to provide the community with more detailed information about cemetery history, events, memorialisation and interment options.

Recommendation Ten (Page 21)

That headstone lawn beams be progressively installed at all sites.

Recommendation Eleven (Page 21)

That cremated remains interment options be expanded to better recognise that client families have varying tastes, incomes and preferences.

Recommendation Twelve (Page 21)

That a token memorial be created at each cemetery.

Recommendation Thirteen (Page 21)

That trees which are or are likely to damage monument or heritage walls be progressively removed or root barriers installed.

Recommendation Fourteen (Page 21)

That monuments are inspected during construction to ensure they are compliant with the approved permit.

MATTERS UNDER CONSIDERATION

1 Background

The goal that is being addressed within this management plan is: *“To provide dignified, functional interment facilities, whilst acknowledging the cemeteries heritage, that are compatible with their environment and capable of meeting the evolving needs of the community.”*

This management plan concisely identifies existing issues, sets out potential rectification strategies and the means by which the CCC can appropriately enhance the provision of cemetery facilities. It considers the needs of the community and the expectations for arrangements to be conducted with dignity and accuracy, within settings that are aesthetic and affordable.

The management plan is:

- intended to be understood by all stakeholders including clients, the general community, the funeral industry and government authorities
- flexible to enable it to be used as a contemporary management tool, reflecting community trends and the need to tailor projects to budgets within an achievable time frame.
- a concise summary of the issues and matters raised within individual site reports. It will serve to guide Council’s strategic approach to managing its cemetery operations.

This plan has been prepared in consultation with community representatives, Copper Coast Council staff and councillors, local funeral directors and monumental masons.

2 Applicable legislation, regulations and charters

In the management of its cemeteries CCC will comply with the

- SA Burial and Cremation Act 2013
- SA Burial and Cremation Regulations 2014
- SA Heritage Places Act 1993
- SA Heritage Places Regulations 2020
- SA Local Government (General) Regulations 2013
- SA Local Government Act 1999
- Standards Australia - Headstones and cemetery monuments AS 4204:2019
- The Burra Charter (for Places of Cultural Significance) 1999

3 The Council’s role

The Copper Coast Council (CCC) is entrusted with the care of four cemeteries:

- Greens Plains West
- Kadina
- Moonta
- Wallaroo

All four are a part of Narungga Land. The CCC recognises the Narungga people as the traditional and continuing custodians of the land. Two of the sites (Kadina and Moonta) have related heritage classifications.

Rather than seeing the cemeteries as a potentially self-funding, commercial activity, CCC recognises them as being ‘public goods’ ie appropriately funded from CCC ratepayer revenue. That is not to say that cemetery goods and services will be free of charge.

Whilst it is reasonable to expect that the fees will make a significant contribution towards current costs, it is not equitable to expect current client families to meet the accumulated historic, perpetual site maintenance obligations.

Council is responsible for the overall site maintenance and infrastructure, safety, record keeping, conduct of interments, determining the range of acceptable memorial formats and controlling memorial installations. It is not responsible for the maintenance of individual private monuments.

The perpetual maintenance of the cemeteries creates intergenerational costs for future ratepayers. As such, CCC cemeteries are a unique public good. To the extent that the land used for bodily interments is “alienated” from a future alternative use, the cemetery operator is locked into looking after the site forever.

This is particularly the case within the Copper Coast sites, as neither the council nor the community have expressed any interest in making use of the available legislative provisions to re-use the graves either for more burials or an alternate use.

a) Re-use v reclaiming interment rights

It was evident during community consultation that there was confusion in relation to the distinction between re-use and the reclaiming of unexercised interment rights. **The distinction between them is that re-use involves the disturbance of human remains. Reclaiming does not.**

When an interment right for a burial position is issued, the holder of that right does not own the land, only the right to use it for interment purposes. Prior to 2013, under South Australian legislation, all interment rights had limited tenure. They could not be issued for more than 99 years. If issued for less than 99, at the expiry of that period they could be renewed. If not renewed, the cemetery operator could extinguish the right, disinter or lower the remains and sell the interment right again ie to allow the grave to be re-used.

Under the Section 31 of the 2013 Act, cemetery operators may now issue interment rights with a duration of either

- a) *“for the period specified in the interment right; or*
- b) *in perpetuity.”*

Since 1995 CCC has issued all interment right with 50 year terms. Right holders are able to renew the right. If the right is not renewed then at council's discretion it may apply Section 38 (1) of the Act and

- a) *“re-use the interment site to which the interment right related; and*
- b) *remove any memorial to a deceased person erected on or at the site.”*

Given the age of the CCC sites, inevitably some interment rights will have expired (even the 99 year leases pre 1995). It appears neither the Council nor the community are interested in applying the re-use provisions of the Act.

In these circumstances and given the available future space at some of the sites, Council might consider it appropriate to issue interment rights in perpetuity. Centennial Park offers both limited period and perpetual rights at different fees. This allows client families to choose which term they want. It makes sense to offer perpetuity at a higher fee.

Either way it would be good governance for CCC to clearly state that even if a right is perpetual, if it is not exercised (used for interment) within a specific time period, it reverts to council ie Council can reclaim the grave. This prevents a grave being sold but never used.

Recommendation One

That consideration be given to issuing all interment rights in perpetuity but subject to a clear requirement that they be exercised within 50 years (if not they revert to Council).

b) Site capacity

At first glance some commentators would suggest that CCC need not be concerned about its cemetery capacity. That approach is inconsistent with the CCC Mission of “*Providing effective and affordable facilities and services*”. The cemeteries are there forever, so the way in which they are managed and developed has significant implications for the future.

Table one... Cemetery average interment activity and site life

Cemetery	Opened	Site area		Ave. interments last 11 years		Available graves	Site life Years
		Ha	M2	Bodily	Ash		
Greens Plains West	Mid/late 1800s	8.7	87,411	1	1	lots	300+
	Records 1905						
Kadina	1861	5.45	54,551	25	10	800	General 1-2,
							Lawn 10-15
Moonta	1866	14.08	140,817	19	10	8,000	Within wall, 40-50
Wallaroo	1861	19.83	198,320	13	10	400	Within fence 20-30

The estimated site life will be prolonged if

- a prudent approach to space utilisation is adopted ie space is not wasted within double rows between back to back monuments
- processes are put in place to ascertain which sold interment rights are unlikely to ever be used, and to reclaim those that have expired (but in which no interment has already occurred)
- the positioning of new graves in existing areas is planned, not decided on an ad hoc at needs basis
- formal masterplanning is done of new sections to ensure that the historic character of the site is reflected in the design, that space is efficiently utilised and that provision is made for shelters, seating and other infrastructure.

A landscape masterplan should provide a blueprint for efficient development. It ought to consider for example

- where to put rows, to ensure space is efficiently allocated
- what to plant
- what to remove and in what sequence
- placement of amenities: shelter, seats, reflection spaces
- drainage and site encumbrances
- ensuring that turns and turning spaces accommodate over length vehicles eg hearses

Given the significant underutilisation of Greens Plains West and Wallaroo, it would be prudent to budget to fully masterplan those sites. Whilst Synergy is not promoted as a cemetery mapping solution, it appears to be able to deal with rateable property spaces. In reality, graves in their simplest sense are small unrated sites.

Thinking laterally Synergy may be able to cope with the addition of rows etc. Given the complexity of historic records, CCC cemetery activity warrants the application of specialist software eg the community edition of Opus Xenta's beyond cloud.

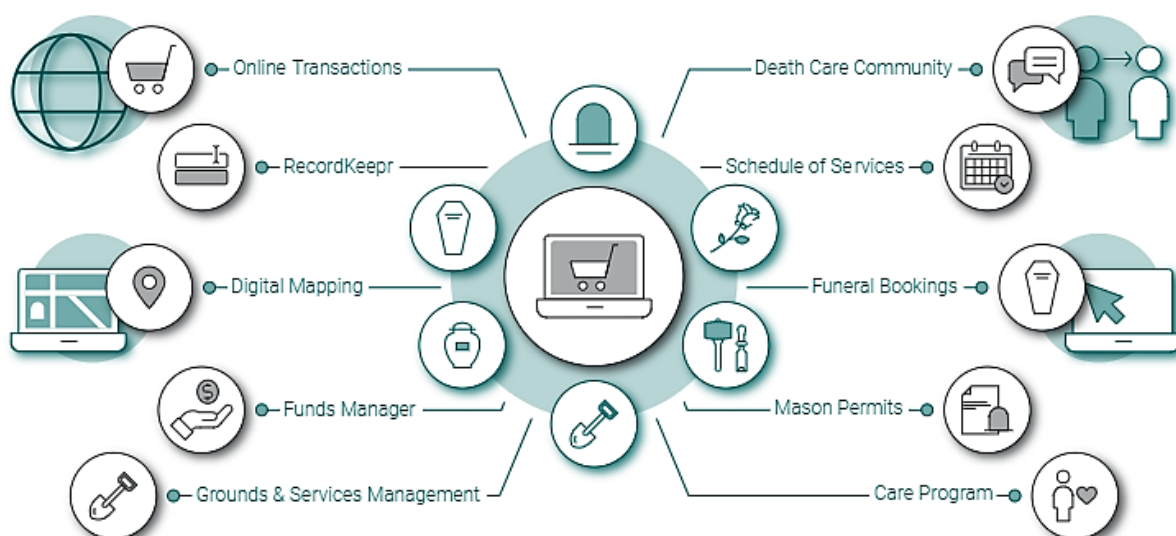


Fig. one... <https://opusxenta.com/features/opusxc-community-edition>

The software depicted in **Figure one** (or a version thereof) is used in large capital city cemetery trusts eg Adelaide Cemetery Authority (Enfield). Opus Xenta offers a scaled down version, byondpro Community Edition, which it indicates is “a simple to use yet effective mapping and record management solution...”. It can be accessed as a monthly rental.

Thinking laterally, if the National Trust really does have more detailed records of Moonta interments than CCC, a specialist software system might facilitate importing that data.

Recommendation Two

That two years supply of graves be plotted progressively for each site.

Recommendation Three

That landscape masterplanning be undertaken for new sections at Kadina and Moonta and for the whole sites at Wallaroo and Greens Plains West.

Recommendation Four

That consideration be given to the utilisation of Synergy or simple specialist cemetery software, to map additions to existing sections and or import external data.

4 The changing nature of demand

Over an 11 year period, there were 650 bodily and 314 cremated remains interments within CCC sites. Historically burial has been the dominant form of bodily disposition. The nearest cremation facilities were at Gawler and Enfield. Utilising those facilities incurred additional funeral director’s costs for travel and made burial a cost effective option.

That situation is changing. Clearly preferences are switching to cremation. The existing trend is clear and will become more evident now that the local Central Region Crematorium has opened. Whilst the ratio is relatively stable at Moonta, at Kadina cremation interments are trending up. At Wallaroo they already exceed burial.

The real strategic question is how well is CCC positioned to leverage the trend. In the face of a clearly defined aggregate reduction in the proportion of human remains disposition by

burial compared to cremation, the challenge will be to satisfactorily provide for the community's cremated remains memorialisation needs.

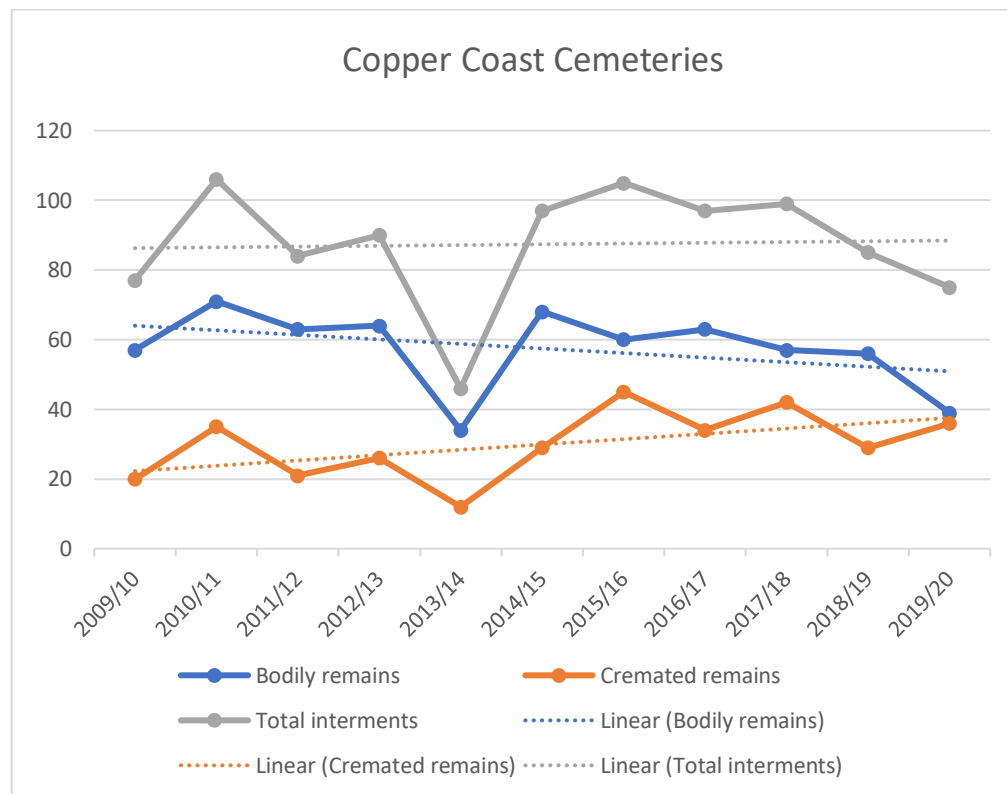


Fig. two... Trends in human remains interments

If CCC continues with its current approach and product mix, inevitably revenue growth will be limited. In turn either

- more rate payers' funds will need to be allocated to cemeteries, with an opportunity cost for competing council projects or
- the standard of cemetery presentation will be allowed to decline.

As a progressive council, concerned to ensure that its community obligations are adequately addressed, CCC needs to consider a proactive strategic approach. Given its finite resources, the challenge is to sharpen its operational focus and to expand its product range, without incurring unrecoverable costs.

5 Current operating approach

a) Management

An external stakeholder provided the following observation

"the cemeteries within Copper Coast are well maintained aesthetically and operations within administration are easy to work with excluding the issue we have... (in regard to funerals)... on Saturdays or Public Holidays".

Within the current organisational structure, responsibility for aspects of cemeteries are covered by several different departments. Given the volume of activity, that is understandable. It was clear that staff are committed but lack time to expand their focus on cemetery matters. If the issues raised in the individual site reports are to be addressed appropriately, additional staff resources will need to be allocated. That allocation should be self funding.

Whilst all four sites are neat and tidy, there were aspects of each that warranted ongoing attention. Overall, there appears to be no framework in place for regular site inspections. Maintenance is on a 'find and fix' basis. Cemetery gardens do not appear to receive the equivalent attention as their public garden equivalents. Records are well kept but insufficiently supported by IT systems eg for plot mapping. Monument applications have an approval process but no accompanying site checks to ensure compliance. The web site contains good information about the issues with historic records but does little to educate the public about available products and services.

Appointing one person to be responsible on a day to day basis for oversight of the sites and their operational effectiveness, would significantly diminish the ongoing issues. Ideally that person would be someone that is able to

- visit sites regularly (as part of their normal range of duties), rather than being restricted to a depot area or head office
- effectively work across the departmental channels ie they need to be empowered to raise matters with various senior managers
- liaise on site with client families, funeral directors and monumental masons, as required
- proactively identify matters that need to be addressed eg maintenance, tree removal, fence repairs and know how to get things done
- work cooperatively across staff departmental boundaries and with community groups eg the Kernewek Lowender festival organisers
- assist with plot planning, product mix enhancements and site development needs, facilitating landscape masterplanning

Historically, this role may have been designated as a sexton or curator. In more modern cemetery practice it is more likely to be referred to as Cemetery Operations Manager or similar. It can be part of a job role rather than the sole duty of the appointee.

The key to success is for Council to recognise the importance of the role and the need for change.

Recommendation Five

That consideration be given to designating a person as being responsible for managing cemetery operations.

b) Site characteristics

With limited income, CCC is faced with a wide range of at times competing community demands. Cemetery external stakeholders strongly advocated the need to provide toilet facilities at Greens Plains West. The strength of that demand was driven by the isolation of the site, distance to alternative public facilities and the need to provide amenities for mourners and staff.

Ideally, all sites would have shelters in reasonable proximity to their main current interment areas. Where new sections are being planned consideration ought to be given to providing a structure to facilitate gatherings of mourners. It need not be elaborate (**Fig. three**) and might be established in conjunction with cremation memorials.



Fig. three... Miles Cemetery shelter (Western Downs Regional Council. Qld)

Table two...Cemetery Summary of site characteristics

Cemetery	Greens Plains West	Kadina	Moonta	Wallaroo
Bins	No	Yes	Yes	Yes
On site security	No	No	No	No
Religion section signs	No	No	No	Yes
Shelter	No	Mortuary	Yes but small and not close to burials	Yes but dirt floor
Site map displayed	No	No	No	No
Site named (entrance)	No	No	Yes	No
Taps	Yes	Yes	Yes	Yes
Toilets	No - but needed	modern	old	modern
Way finding signs	No	No	No	No
Seats	No	Yes but more welcome		
Car park	not formally designated			
Plots designated	different system at each site - Wallaroo clearest			

Over time, additional shelters can be self funding. The Barunga Council has provided shelters at Port Broughton and Bute cemeteries. It was suggested that a hire fee of \$100-\$150 could be applied when the shelters are booked in conjunction with an interment.

Recommendation Six

That toilet facilities be included within the Greens Plains West development plan.

c) Helping mourners and visitors

Reference has also been made to the need for seats, shelters and toilets to facilitate mourning, contemplation and visitation. There is also an overarching need to make it easier to find sections and plots within them.

i) Site signage

Only Moonta has a clear cemetery name displayed, roadside. Greens Plains West has a sign but it is not visible from the road.

Upon arrival at the sites, there is nothing to assist visitors to find facilities eg toilets or sections, rows or individual plots. Apart from notices informing monumental masons that a permit is required, there is little evidence that CCC is responsible for the sites, related key rules and contact numbers.

This could be addressed by installing consistent signage in a prominent position near the entrances at each site. At Echunga Cemetery, the Mount Barker District Council, has erected a simple sign that shows the religious sections, rows and plot numbers.

At Cabarlah and Myall, the entrance signage clearly delineates the internal roadways, section denominations and row numbers. The actual plot numbers are designated on site (just as they are at Wallaroo).

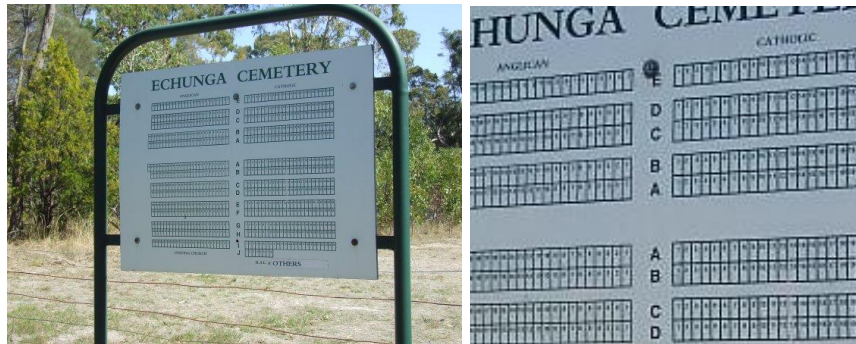


Fig. four... Echunga Cemetery... Photo Andrea Thomas

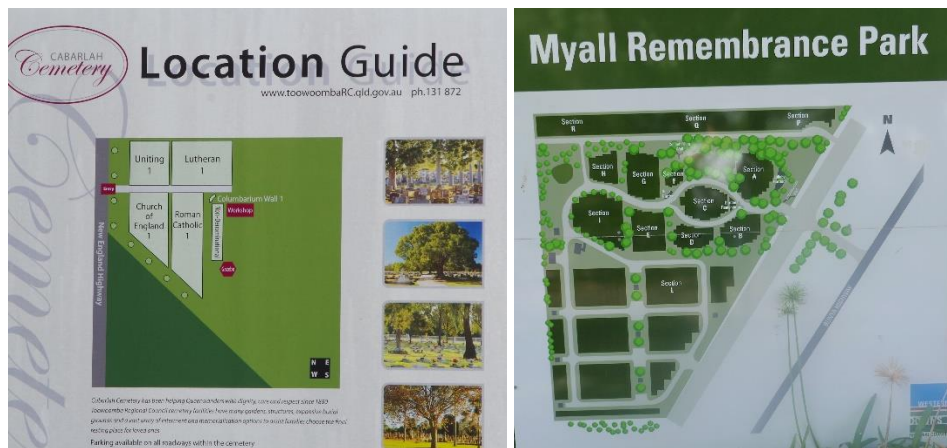


Fig. five... Cabarlah (Toowoomba RC)

Myall (Western Downs RC)

Obviously in a large site with literally thousands of existing interments and more than 100 years of operation, creating a simple all encompassing, entrance sign can be a challenge. It is possible if good maps are developed.

The Melbourne General Cemetery is more than 160 years old, has a very complex site layout, virtually no available interment rights and occupies more than 40ha (100 acres). Its entrance sign is positioned just inside the front gate (**see Appendix B**). It shows the individual sections, roads and main pathways, key visual reference points (to make navigation easier) and a list of the key historic interments. It is overlaid with a grid reference system.

Erection of clear signage within all CCC sites would assist mourners, genealogists, Kernewek Lowender participants and the community in general. A consistent approach across all sites would be appropriate. Being consistent is about style and imagery ie the information conveyed. Some sites signs may be able to accommodate more plot details than others.

Within the site reports, consistent reference has been made to the suitability of the *Copper Brought Them Here* cemetery maps. With appropriate approvals those maps could potentially be a starting point for CCC.

Recommendation Seven

That each site has signage to show the location at least of internal roads, religious sections, rows and toilets.

ii) Plot designation

Each of the CCC cemeteries have maintained their individual but different historic approaches to site mapping and numbering.

- At Green Plains West, site maps reference the plots each side of a numbered path. Numbers are repeated. Regrettably, there is no path number delineation at the end of pathways and no site plan displayed. Therefore, even if a family knows the grave number it is going to be difficult to find the grave.
- At Kadina, it was the pathways themselves that were numbered, not the rows. At Greens Plains West, it was the plots either side of a pathway that were numbered.
- Within Moonta, the rows are numbered but the plot layout between rows varies. There are some singles, some double (head to head) monumental plots and some triples. A row is regarded as the plots between two pathways - regardless of whether those plots are singles or double or triples in configuration.
- Wallaroo is different again. Rather than number rows or pathways, it runs sequences of plot numbers within sections. At the end of rows, the plot numbers in that row and section are clearly referenced on a metal marker.

This is no fault of the staff. They are working with historic plans. Those plans are the basis of the plot maps on the CCC web site. Some of those maps are not easy to follow eg Moonta. From a lay person's perspective, all would benefit from consistency in approach, inclusion of a compass reference and indications of toilet locations.

Having simpler maps available on the web site and within the cemetery, would assist the community and visitors during the Kernewek Lowender Festival. It was suggested that print outs of the maps could be available in weatherproof containers at each site.

It is not practical to provide details of individual interments, in printed format, at each site. The site sign should reference the availability of the Deceased Search facility on the CCC web site.

It is also not practical to seek to correct the past. Moving forward as new sections, areas or rows are added, a consistent CCC approach should be adopted. Of the existing four systems, Wallaroo's appears to be the best. Over time the Wallaroo approach and style of marker should be implemented across at least all new site sections.

Recommendation Eight

That CCC implement a consistent approach to designating new sections, rows and plots within its sites.

iii) Web site

Currently, the web site provides access to a deceased search facility, location maps and plot maps for each site. Some maps appear incomplete or are less user friendly than they might be.

There are several community groups with overlapping interests in aspects of the cemeteries eg the museum, history groups, National Trust, Dressing the Graves committee etc. Each to varying degrees has related records and spread sheets, which at times contain information that may not be included in council records. There would appear to be an opportunity for the web site to provide links to these organisations.

Specific articles of interest could be included on the web. In addition, to plot identification information, the site should also contain a concise summary of each cemetery's history.

The CCC recognises the significance of the Copper Coast Cornish Festival and the economic activity it brings to the region. Over time, there is potential to facilitate more

onsite interest in the cemeteries. During consultation, some related suggestions were made:

- named markers or section signage for unmarked heritage graves
- QR codes for graves of notable people, with linked stories
- explanatory signage re mine deaths and unmarked graves.

Promotion of potential site activities could be incorporated within both the cemetery web site and also tourism promotional materials. An example of this approach is Robe's Tombstone Tales www.robewalk.com. If the gravediggers hut at Moonta was featured as part of a similar strategy, it would be more likely to be visited.

Unfortunately, staff efforts in the past to upload photos of monuments etc have been unsuccessful. If the IT software does not facilitate photo displays and files, consideration should be given to highlighting links to other potential sources eg <https://www.findagrave.com> <http://www.australiancemeteries.com.au/> <https://billiongraves.com/> Council cannot fact check the information on other sites but it can publish a similar disclaimer, just as it does for its own historic records.

It would be sensible to also ensure that material intended to be printed from the web site or accessible on hand held devices, should be formatted with that in mind.

There will be occasions where the web site could also celebrate local historic identities (even if not interred buried in a CCC) eg Air Marshal Sir Richard Williams, KBE, CB, DSO was born at Moonta Mines (1890-1980). He is widely regarded as the "father" of the Royal Australian Air Force (RAAF), becoming its first Chief of Air Staff in 1922. The centenary of that appointment and of the RAAF, is worthy of celebration. His service could be commemorated at Moonta.

As well as recognising key events and providing insights into cemetery histories, the web site is able to be used to enlighten the community about available bodily and cremated remains interment offerings. It should promote interest rather than ignoring opportunities.

Recommendation Nine

That the web site be used to provide the community with more detailed information about cemetery history, events, memorialisation and interment options.

6 Available and potential product mix

The fact that the provision of cemetery services is regarded as a community obligation rather than a commercial activity, is not a reason to deprive the community of access to a reasonable range of interment opportunities. The current product mix reflects past, not best practice. It also fails to recognise the apparent trend towards cremation.

The suggestions in this report are based upon utilising existing assets better, rather than incurring significant capital costs eg for granite niche walls.

i) Headstone lawn beams

Notwithstanding the fact that the Kadina headstone lawn beam graves are (appropriately) dearer than their monumental equivalent, they are far more popular. The area looks nice, it is modern, a nice space to visit and graves are not overshadowed by older style (expensive) monuments. CCC is to be commended for enforcing its policy on height and width restrictions. If it allows a variation once, it sets a precedent that is likely to haunt it in future years.

Should a client family prefer to erect a larger headstone, off the beam, in a monumental section, they are able to do so. Few do.

In planning new sections at all sites, the installation of lawn beams should be considered, along with planting of drought tolerant grass and the future use of recycled water.

The costs incurred by a client family, for a headstone (on the beam) are likely to be thousands of dollars less than for a full monument. A strong case can be made for increasing the differential between the lawn beam and the monumental section interment right fees.

Table three... Available and practical additional interment options

Interment option	Greens Plains	Kadina	Moonta	Wallaroo
Bodily remains:				
Lawn grave with beam for headstone	Needed	Yes	Needed	Needed
Monumental: can be full monumental or individual headstone	Yes	Yes	Yes	Yes
Cremated remains:				
Double spots or family locations	Needed	Needed	Needed	Needed
End of row/foot of grave	Needed	Needed	Yes	Needed
Garden bed position	Needed	Rose beds need rejuvenation	Rosemary beds need rejuvenation	Rose beds need rejuvenation
Into grave	Yes	Yes	Yes	Yes
Niche wall brick (often hold only partial remains)	Yes	Yes	Yes	Yes
Niche wall granite: modern, full remains capacity	n/a	n/a	n/a	n/a
Token (name but no ashes)	Needed	Needed	Needed	Needed
Tree positions	Needed	Needed	Needed	Needed

In modern metropolitan cemeteries, full monuments tend to be preferred by followers of Orthodox religions. As these groups are not a significant proportion of the Copper Coast demographic, the lack of demand for monumental space at Kadina is understandable. The demand elsewhere reflects the lack of an alternative. The other sites would follow a similar pattern if non-denominational concrete beams were available.

ii) Natural burials

All sites should be able to offer natural burial interment. It need not be created in large sections. The spots could be selected to utilise space that is not suited to larger rows or where CCC wishes to regenerate or retain vegetation.

At Enfield, the Wirra Wonga natural section is along a boundary fence. At Kemps Creek in Sydney, it is within an open grassed lawn area. At Lismore (NSW) the graves are scattered amongst trees and undergrowth. At Gungahlin Cemetery (ACT) the natural burial space creates a garden divide between cemetery sections.

The common characteristics between them are that:

- visible grave memorialisation is not allowed
- policy clearly stipulates the nature of commemoration
- rules are in place re the use of chemicals in body preparation and the materials from which the receptacle (shroud, coffin, basket) is made
- fees are equivalent to lawn graves and can be higher in a premium location.

Natural burial locations should be plotted for each site and made available for sale on the fee list. Just putting them on the list will alert funeral directors and the community to their availability.

iii) Inexpensively enhancing cremation options

The current positions available for cremated remains interment, are unlikely to engender ongoing interest. Modern cemetery experience is that brick niche walls, despite being the least expensive option (even if they hold full remains) are not in high demand.

Whilst the Moonta niches are far from enticing, at least there is also the opportunity to utilise end of row positions for in ground interment of cremated remains.

Three of the sites have extensive, prominent rose or rosemary garden beds. All of them offer significant potential as up market cremated remains positions. They need rejuvenation.

Similarly, best practice is also to offer cremation interment locations around existing trees.

Understandably, CCC may not want to utilise its staff to sell plaques and granite. Really it does not need to. All it needs to do is

- recognise that offering only mini plaques on old concrete kerbs will not attract much interest
- allocate locations within each bed or around trees, for which an interment right can be made available
- determine what size plaque and base is acceptable
- set appropriate fees eg with walls as an entry level, gardens the next step and tree locations top end. The market place ie the community, will then be able to exercise choice and the fees will reflect product attributes. Not every house on the Copper Coast is the same design or price. The options for interment should reflect the same characteristics.

Given clear parameters and if CCC encourages them to make the related merchandise available, it is highly likely that local funeral directors and masons will promote the interment sites and sell the plaques and granite. It is a win win.

In allocating garden bed and tree interment locations, CCC should recognise that latent demand is highly likely to exist for not only single positions but also doubles and family spots. Best practice is to create interment locations that can take differing numbers of remains and variations in memorialisation.

The existing product mix and fees really do not recognise that family tastes, incomes and preferences vary. The approaches suggested in this report require little investment. They will better satisfy the client families and help to fund cemetery operations and perpetual maintenance.

iv) Token memorials

Traditionally, RSL commemorative memorials were used to commemorate the service of community members who perished serving our country. Whilst the contribution of those people was the ultimate sacrifice, such memorials fall into the category of token memorials.

They may carry the names of deceased people whose human remains may not actually be interred within the cemetery or whose place of interment is unknown or whose place of interment is known but elsewhere.

Token memorials might also be used as a focal point of commemoration eg for Air Marshal Sir Richard Williams, KBE, CB, DSO (1890-1980). They can become a focal point for tourism and the Copper Coast Festival.

Some stakeholders were keen for the CCC to memorialise every unmarked grave. Whilst that is not practical, CCC could provide an opportunity for interested persons to purchase a permanent token memorial.

The recently unveiled Port Hughes Seamen's memorial (**Fig. five**) creates a point of 'art tourism' focus. The combined project was led by The Friends of Port Hughes group.



Fig. Five

Photo: Glenys Gelzinis

<https://caravancorrespondent.com/2021/01/29/street-art-of-the-copper-triangle-south-australia/#more-9615>

Some token memorials in public places are themed eg the Port Hughes Seamen's memorial and the Robe Fishermen's memorial (**Fig six.**).



Fig six... Robe

The Robe memorial is referenced on Trip Adviser as a point of interest and landmark. "The **Robe Fishermen's Memorial** is located at the entrance to Lake Butler Marina and commemorates the lives of local **fishermen** lost at sea. A whale shaped plaque is affixed to the **Memorial** for each lost **fishermen** with names, dates, ship names and circumstances.

This is yet another example of coupling commemoration with tourism. Adding visitation of token memorials and the opportunity to create one, to the extensive promotional activity associated with Kernewek Lowender, is an obvious opportunity. It would also provide a chance for commemoration of related but unidentifiable interment positions.



Given the active nature of local history groups, there would seem to be real potential in progressing themed memorials within Moonta cemetery. Whether it is a combined memorial re children and miners or they are commemorated separately, is likely to be determined by funding and artistic creativity.

Whilst costly commercial options are available, token memorials need not be elaborate or expensive to create. Often a flat faced vertical rock face is used and name plaques are

attached to it. A fee is paid for the position on the rock. Such rocks are usually placed in a prominent position. It would cost very little to offer one at each site.

Recommendation Ten

That headstone lawn beams be progressively installed at all sites.

Recommendation Eleven

That cremated remains interment options be expanded to better recognise that client families have varying tastes, incomes and preferences.

Recommendation Twelve

That a token memorial be created at each cemetery.

7 Monumental and memorialisation issues

More detailed commentary in relation to particular sites is included within their individual reports.

In summary, trees adjacent to the perimeter walls appear to be a significant problem at Kadina and Moonta. At Wallaroo, the street boundary planting is also in need of remediation or removal.

The CCC has an obligation to protect its Heritage listed assets and to diminish the risk of damage to monuments, caused by tree root penetration. That responsibility is quite separate to the question of repairing existing and at times significantly deteriorating monuments. Whilst the monuments are of concern, it is not the Council's responsibility to repair them. That lies with the descendants of the historic holders of the burial licences.

Where a repair is to be undertaken, it should be in accordance with the Burra Charter. It *"advocates a cautious approach to change: do as much as necessary to care for the place and make it useable, but otherwise do as little as possible to ensure that its cultural significance is retained"*.

The current policy references the Australian Standard for Headstones and cemetery monuments (recently updated AS 4204:2019). Processes are clearly in place for permit applications to be lodged and approved, before a monument or memorial is installed.

Presently there does not appear to be a site check of the foundations before installation of the monument occurs. Similarly there is not a process in place to check that a recently installed monument actually had a permit. Either way, this potentially creates risks for the Council. Whilst CCC relies upon the CCASA registration process to 'vet' the acceptability of an Applicant, it cannot reasonably assume that works will always match approved permits.

That inspection role could be part of the duties of the cemetery manager.

Recommendation Thirteen

That trees which are or are likely to damage monument or heritage walls be progressively removed or root barriers installed.

Recommendation Fourteen

That monuments are inspected during construction to ensure they are compliant with the approved permit.

8 Indicative action programmes

This report contains recommendations in relation to the management and operation of CCC cemeteries.

Specific aspects in relation to each site are contained within their individual reports.

9 Limitation of our Work

General use restriction:

This report is prepared solely for the internal use of the Copper Coast Council. It is not intended to and should not be used or relied upon by anyone else and we accept no duty of care to any other person or entity.

In conducting our work we have relied on the information provided to us by Council and representations made by the Council and management. We have not performed an audit or verification of the information that we have been provided.

The report has been prepared for the purpose set out in the Scope of this document. You should not refer to or use our name or the advice for any other purpose

Appendix A... Contributors

Assistance with provision of information and insights pertaining to this report was received from a variety of sources. Their direct input and co-operation was appreciated.

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Andrea Thomas	Records Management Governance Officer
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b) External

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Robyn Knight	Dressing the Graves Convenor, Vice Chair - Moonta National Trust
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Robert Pitt	CEO – Adelaide Cemeteries Authority
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Appendix B... Melbourne General Cemetery signage

