

Environment Agency Policy

Water quality policy on protecting controlled waters – funeral practices and the environment

Policy Number:

Policy Statement:

Faith groups and individuals follow different traditions and practices when a loved one dies. For some this involves spreading the ashes of their dead in rivers and streams, others wish to bury their dead at home. The Environment Agency does not want to unnecessarily obstruct or interfere with these traditions.

There is no evidence to suggest that either the disposal of human ashes in rivers and streams or home burials have a negative impact on the environment. But we are concerned that other aspects of these practices, such as casting tributes and other objects into the water at the same time as the ashes, could harm the environment or upset other river users.

This document outlines the Environment Agency's policy to prevent any harm to the environment as a result of funeral practices, including the spreading of ashes on water and home burials.

Our policy

- We aim to respond positively to those members of the community who wish to scatter ashes on water or bury their dead at home, but we need to ensure that they do not harm the environment or upset other river users. As long as those taking part in funeral ceremonies ensure the environment is not damaged and other members of the public are not upset we have no objection to these practices.
- We will treat all requests individually and with sensitivity, so that we do not cause further stress to the terminally ill or bereaved. We will always strive to give clear, unambiguous advice. We will only refuse requests in the very rare cases where there is an unacceptable risk to water quality. If we believe that a proposed location is inappropriate, we will make our reasons clear and where possible, suggest alternatives.

Spreading ashes on water:

Ashes themselves have little impact on water quality. However the environment can be damaged by throwing other items into the water that are not bio-degradable, cause litter and may be harmful to wildlife. Typically these items are plastic bags and wreaths that contain plastic or metal.

Individual ceremonies to spread ashes are unlikely to result in any measurable impact on water quality. However, if a site is in regular use, we will need to assess the environmental impact. We will consider how often the site is used, the amount of water that passes it and if there is anything downstream such as drinking water abstraction points, weirs or locks that might be affected.

The Environment Agency's Area offices will:

- identify stretches of river on which the scattering of ashes should not take place, taking into account river flows, other river users and abstractions. Locations traditionally used will be considered with particular care, and alternatives proposed if there is an environmental risk.
- maintain communications with local faith groups, undertakers and river users to ensure that we are aware of any developing preference for the use of particular sites.
- review the situation if a particular location begins to be used very frequently.

People arranging individual ceremonies will not require Environment Agency approval, but we will expect them to follow these common sense guidelines:

- Do not spread ashes within 1km upstream of any drinking water supply.
- Do not use the following locations:
 - a bridge over a river used by boaters and canoeists
 - anywhere close to a marina
 - anywhere close to anglers
 - anywhere close to bathers
- Do not hold ceremonies in windy weather or close to buildings because of the risk of the ashes being blown astray. You should spread the ashes as close to the surface of the water as is reasonably possible.
- Do not allow other materials such as wreathes and plastic bags to enter the water or to be left on the bank.

Where the above conditions can not be met, we will have to consider the circumstances. We will do this with care based on water quality issues at the location to be used.

Home burials

This part of the policy relates to burials in the ground with the potential to impact surface or ground water.

Advice on alternative funeral practices that can minimise environmental harm, and on home burials, can be obtained from a number of sources, including the Natural Death Centre.

Some so called “notifiable diseases” are automatically reported to the local authority, which will decide if they should become involved, although this rarely affects home burials.

People who want advice on home burials may wish to consult with the local council’s Environmental Health Department, who should be able to provide advice. Our advice to local authorities is that we would like to see the following conditions met:

- No burials should take place within 30 metres of any spring or standing or running water and should be at least 10 metres from any ‘dry’ ditch or field drain.
- The burial plot should be at least 50 metres away from any well, borehole or spring that supplies water for any use. Our Groundwater and Contaminated Land Team can provide advice on sensitive Groundwater Zones.

If these conditions can not be met, we would like to undertake an individual assessment, although a refusal is unlikely.

When preparing the grave, it is recommended that the person responsible should ensure that:

- There is least one metre of subsoil below the body,
- There is at least one metre of soil to cover the body.
- The grave does not contain any standing water when it is first dug, and is not dug in very

sandy soil.

Objectives

We expect that this policy will contribute to our objectives of a healthier environment and better quality of life for all by:

- protecting the environment and river users from any harm or upset caused by funeral practices such as the spreading ashes or home burials;
- taking account of the beliefs and concerns of diverse groups and sectors
- providing guidance on funeral practices that everyone can understand and that people comply with.

The key objectives of the policy are to:

- Protect the environment by preventing or minimising pollution from funeral practices;
- Fulfil our remit on sustainable development, pollution control and conservation;
- Meet the needs of faith groups and individuals who wish to scatter ashes or bury their dead at home, while ensuring that they do not harm the environment or upset other water users;
- Refuse requests where there is an unacceptable risk to water quality;
- Provide a clear explanation as to why we have refused the request
- Make our policies, process, guidance and work instructions available to both staff and the public to show how we deal with these requests.

Policy Author: Phil Chatfield (Policy Advisor)
Water Quality Function, Environment Protection Directorate.

Policy Sponsor: Tricia Henton, Head of Environmental Quality

Signature of Authorisation by Policy Sponsor:

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If you have any queries relating to the content of this document, or suggestions for improvements, please contact the Policy Author named above.

If any of the terms or acronyms used in this document is unfamiliar you might find the definition in the Glossary on the Agency's Intranet site:
Information Resources > [Glossary of Terms and Acronyms](#).

APPENDIX 2

Explanatory Note

WATER QUALITY POLICY ON protecting CONTROLLED WATERS – FUNERAL PRACTICES AND THE ENVIRONMENT

Policy Number:

Background: We regularly receive requests from bereaved families who want to spread ashes on controlled waters or to bury their dead at home. In addition, we have had requests from people who want to set up permanent facilities for spreading ashes. We have also had complaints regarding the aesthetic and environmental impact of some of the associated practices that go with spreading ashes.

For private burials, no planning permission is required for "a limited number of unmarked and unfenced graves". Although the Institution of Burial and Cremation Authorities recommends that people considering private burial should consult the Environment Agency and their local council's Environmental Health Department about possible pollution of the environment and public nuisance, if our guidance is followed this is not necessary. There is no law preventing people from burying in their own garden, but they must obtain beforehand a burial authorisation form from the Registrar of Deaths or Coroner. After the burial, they return part of the form with details of the date and location of burial. The burial must also be recorded in a land burial register (which includes a site plan) which is kept by the land owner. This should generally be kept with the deeds of the property.

The policy aims to provide both our staff and the public with clear guidance on these matters. It aims to protect water quality and wildlife, although additional guidance on issues concerning other river users such as boaters and anglers users is included.

Definitions

'*controlled waters*' – any relevant territorial waters that extend seaward for three miles from the baselines, any coastal waters which extend inland from those baselines to the limit of the highest tide or the freshwater limit of any river or watercourse, any enclosed dock which adjoins coastal waters, inland freshwaters, including rivers, watercourses, ponds and lakes with discharges and ground waters (waters contained in underground strata).

Policy drivers:

- **Water Resources Act 1991 (as amended by the Environment Act 1995)** – the statutory requirements detailed in Part III, Chapter II, Sections 85 and 88 of the Water Resources Act 1991 make it an offence to cause and/or knowingly permit poisonous, noxious or polluting matter to enter controlled waters without the consent of the Environment Agency.
- **Environment Act 1995** – Section 4 of the Environment Act (1995) sets out the principal aim of the Environment Agency to protect and enhance the environment, taken as a whole, and to contribute to sustainable development (taking into account any likely costs). Section 39 requires the Environment Agency to take into account any likely costs and benefits of exercising our powers. Our principal functions relating to pollution control (Section 5) are to use our powers to prevent, minimise, remedy or mitigate the effects of pollution on the environment. There are also general powers for conservation duties in Sections 6 and 7.
- **EC Directives** – these include the following Directives: Surface Water Abstraction; Freshwater Fish; Habitats; Birds; Groundwater; and Water Framework.

General Principles:

In framing this guidance we have attempted to achieve a balance between the following principles:

- Defining what is acceptable in sufficient detail in order to protect the water at all times;
- Ensuring that we properly consider the concerns of all water users;
- Keeping the guidance clear so that everyone understands that we need to protect the environment

and the reasons behind our responses to individual requests;

Desired Outcomes:

- That this guidance protects the environment and river users from any adverse affects of funeral practices.
- That we comply with European Directives.
- That we provide guidance on funeral practices that everyone can understand and that people comply with.
- That we take account of the beliefs and concerns of diverse groups and sectors

Audience

Internal: this policy is relevant to Environment Protection staff within Policy, Process Management, Regional Strategic Units (England), Strategic Unit Wales, Service Delivery.

External: this policy will be of particular interest to specific faith groups, undertakers, crematoria operators, river users, Government and local authorities and individuals

**RESPONSE TO SUBMISSIONS RECEIVED ON THE ENVIRONMENT AGENCY'S
CONSULTATION ON A DRAFT POLICY ON:**

“FUNERAL PRACTICES AND THE ENVIRONMENT”

1. INTRODUCTION

The Environment Agency put its draft policy on “Funeral practices and the environment” out to consultation on 11 November 2004. The consultation period ran for a period of three months, ending on 11 February 2005.

We received a total of 25 responses from a variety of organisations. A full list of respondents is given in section 2 of this report. The majority of the responses expressed their support for the general approach we proposed, but a considerable number of points were raised seeking clarification or questioning details of the proposal.

We found these comments extremely helpful. In many cases we have been able to revise the policy along the lines suggested. In other cases, the queries have encouraged us to clarify our proposals. In a small number of cases, we decided it was not appropriate to take points on board, often because these points relate to issues that are not within our jurisdiction.

In section 3 we list all the comments received, grouped by theme. We give our views on each point and indicate where changes have been made in the policy. In some cases the same point was made by more than one group: here we have made just one entry for the issue, indicating the number of respondents who raised it.

The revised version of the policy is in Appendix 1.

2. ORGANISATIONAL AND INDIVIDUAL RESPONDEES

AB Welfare and Wildlife Trust, Harrogate, Yorkshire.
 Anglers Conservation Association
 Anthony David Buxton (individual response)
 John Bennett, Midlands RFERAC (individual response)
 The Broads Authority, Norwich, Norfolk
 Chartered Institute of Environment and Health
 Confederation of Burial Authorities
 Cremation Society of Great Britain
 Croydon Borough Council
 Darlington Borough Council
 Environment Agency staff:

- David De Coster, Thames Region (individual response)
- Naomi Robins, SW Region (individual response)
- Roger Cawte, Thames Region (individual response)

Federation of British Cremation Authorities, Carshalton, Surrey
 Fred Steward, Brunel University
 Inland Waterways Association
 Ipswich Borough Council
 Institute of Cemetery & Crematorium Management
 Jordan's Burial Ground Committee, Amersham, Bucks
 Midlands Regional Environment Protection and Regional Fisheries,
 Recreation and Conservation Advisory Committee
 National Association of Funeral Directors
 The Natural Death Centre, London
 Royal Yachting Association
 Welsh Local Government Association
 Chris Young, Principal Hydrologist, WRc (individual response)

3. COMMENTS RECEIVED BY THEME

Below we list all the comments received, grouped by theme. We indicate the number of respondents raising each issue and provide our views on each.

Issue No.	Issues by Theme	No of Comments	Environment Agency response
	The principles on which our policy is based		
1	Agree with the principles and approach	3	
2	EA taking positive steps to tackle a potentially sensitive issue.	1	
3	Local authorities would not want to promote some of the options being suggested but the reality is that what's being suggested is quite harmless in small numbers.	1	
4	Paramount importance to ensure that the environment does not suffer and river users are not upset as a result of burials at home and scattering of ashes at sea.	1	We seek to ensure that funeral practices do not damage the environment or upset river users.
5	There is a need for a change in the existing	1	We are grateful for the detailed

	paradigm for the disposal of the dead across different levels of government. The Environment Agency should play a role in developing new burial sites, assessing the environmental impacts of existing and future alternatives to existing methods of disposal, presenting the sustainability case for innovations in funeral practices and educating the public.		comments and proposals for future development of government policy on disposal of the dead. These recommendations will inform our thinking but lie outside the scope of the current policy.
6	Oppose any deposit of any sort into waterways that has a significant or material impact on water quality.	1	The evidence shows that scattering ashes in the small quantities that is occurring at present has no material impact on water quality.
7	Need to be sensitive to the requests of families in respect of scattering ashes on water.	1	One of the main principles of the proposed policy is to be sensitive to the requests of bereaved people.
8	Assume scope of policy covers lakes and reservoirs	1	The policy does not cover reservoirs. This has been clarified in the revised policy document.
9	No reference to the sea, ponds, lakes or areas of still water.	1	The policy applies to "controlled waters, ie any relevant territorial waters that extend seaward for three miles from the baselines, any coastal waters which extend inland from those baselines to the limit of the highest tide or the freshwater limit of any river or watercourse, any enclosed dock which adjoins coastal waters, inland freshwaters, including rivers, watercourses, ponds and lakes with discharges and ground waters (waters contained in underground strata).
10	The policy contains contradictions.	1	The responses to the consultation have helped us to identify some errors and contradictions in the policy. This has enabled us to produce a better policy.
11	Would like to know the origins of this paper.	1	We regularly receive requests about scattering ashes and home burials, as explained in the consultation document.
12	Would wish to see it emphasised that cremated remains are not considered or to be treated as "waste".	1	Cremated remains are not waste and we have avoided using language that suggests otherwise.
13	If it is deemed necessary for any agency to have a controlling brief in this matter it would be better to be arranged on a national rather than a local level. In order to ensure adequate experience.	1	The Environment Agency is not proposing that there should be an agency with a controlling brief. However, we will endeavour to work with other responsible agencies as appropriate.
	Our advice to mourners / Communicating the policy		
14	Policy needs to be communicated directly to religious leaders involved in	1	We have had discussions on the policy with religious leaders from the main

	funeral practices.		faiths affected and we will be distributing leaflets about the policy through them.
15	Question the potential effectiveness of faith group representatives or funeral directors as channels for disseminating best practice.	1	We recognise that the views of many bereaved people are not represented by either faith groups or funeral directors. We have consulted on our policy with a wider cross section of institutions and groups (including local councils and interest groups) and we will seek to disseminate the policy through a range of channels.
16	How are recommendations to be brought to the attention of those concerned?	2	We will be producing and distributing an information leaflet which will be available through a range of channels.
17	There must be some system of notifying those intending to spread ashes on the prohibited locations	1	We will be producing and distributing a leaflet, and providing information through our local offices. We also hope to make this information available on our web site.
18	The groups with whom communications are to be maintained should include crematoria.	1	Agree. We will communicate our policy through crematoria.
19	The EA should provide advice to mourners about picking up memorabilia after scattering ashes and other issues.	1	We will be producing a leaflet which will include this kind of advice.
20	It may be helpful if the Agency were to produce a leaflet for distribution via local authorities or in co-operation with local authorities, since it is the LAs who receive most enquiries.	2	We hope to involve local authorities in producing and distributing a leaflet.
21	The Environment Agency should produce two standard letters for staff to use in replying to enquiries about home burials and scattering ashes.	1	We will be producing a leaflet about our policy. We think that this is the main communications tool that staff will need. We think that it is unlikely that staff will be replying to requests by post.
	The way that we are proposing to implement the policy		
	1. Spreading ashes on water		
22	No evidence to support any view that scattering of human ashes on water has a detrimental effect on the environment.	1	This is recognised in the policy.
23	Research is needed to evaluate the numbers of such dispersals, locations & possible risks.	1	The Environment Agency has no plans for such research at present.
24	Agree with proposals, with the caveat	1	We do not consider that scattering ashes

	the scattering should only take place on tidal stretches below any potable water supply intakes, and no other items such as flowers or urns should be thrown into the water.		on non-tidal stretches at no less than one kilometre upstream of a potable water supply intake, poses a significant risk of environmental damage.
25	Would the EA advise on the best times for scattering ashes on water at popular sites to ensure that timing is as private as possible for families.	1	Our policy seeks to avoid concentrating the scattering of ashes at a small number of sites. It is not within our remit to provide this kind of advice.
26	Not necessary to advertise the availability of at home/sea burial wishes as this is likely to increase the number of persons interested, perhaps to the detriment of the community. If enquiries are made then information should be provided but it should be on a question and answer basis, not a public information basis.	1	Our proposed policy refers to scattering ashes on rivers, not to scattering ashes at sea or sea burials. The latter are not within the remit of the EA. We believe that the risk of environmental harm from scattering ashes on rivers is insignificant if the proposed policy is followed. We have a responsibility to ensure that we make our policies and advice available to all who may be affected.
27	Agree with proposal of spreading ashes on water providing people inform EA of intention to dispose of ashes etc. and numbers to not increase dramatically in future years.	1	We believe that the risk of environmental harm from scattering ashes is insignificant if the proposed policy is followed. We do not believe it would be feasible or proportionate to require the bereaved to contact the Environment Agency or to seek to limit the numbers of ceremonies to scatter ashes given the low number of cases at present.
28	Need to specify how often a particular site on a river is used for the Agency to consider that it is "in regular use" or "very frequent" use and carry out or review an environmental impact assessment.	1	<i>We do not believe that it would be appropriate to lay down such criteria, as the size, nature and use of the water body all need to be considered as well as the frequency of use. Our area staff will apply local knowledge in making such assessments.</i>
29	The Broads Authority proposes that the bereaved should consult the Authority before ashes are spread on water.	1	The Environment Agency is unable to provide information in its national policy about authorities with specific responsibilities in different parts of the country.
30	Designated local areas for the dispersal of cremated remains on waterways will assist all parties.	1	We have not ruled out the possibility of designating areas for the scattering of ashes, but we feel that this is not the best approach at the moment as it could unnecessarily restrict people's choice of site and would be difficult to regulate. Repeated use of a small number of sites for scattering ashes might result in damage to the environment at those locations.
31	Consultation document is vague on scattering of ashes. Needs to be more clarity about the practicalities of where	1	We have sought to make our policy as clear and practical as possible. Area offices of the Environment Agency have

	ashes can/cannot be scattered.		detailed knowledge of rivers and will be responsible for identifying stretches which are not suitable for ash scattering.
32	Which rivers in the West Midlands will be affected?	1	All rivers in the country will be affected.
33	Permission of landowner should be sought prior to any dispersal. This could extend to permission of the Environment Agency for dispersal over water.	1	We are not keen to establish a permitting process. Bereavement is a difficult time and we want to reduce the burden of administrative processes. We believe that any risk to the environment can be minimised by the policy proposed.
34	Recreational sites and picnic areas should be excluded for spreading of ashes.	1	The policy emphasises the need for those scattering ashes to avoid areas used for recreation. We have changed the wording of the policy to strengthen this point.
35	Could the “ <i>excluded locations</i> ” and “ <i>preferred alternative locations</i> ” be published on your web site to enable our members to simply check before scattering?	1	Area offices of the Environment Agency have detailed knowledge of rivers and will be responsible for identifying stretches which are not suitable for ash scattering. We agree that it would be useful to identify unsuitable locations on our web site and will be investigating the possibility of doing this. We believe that it would not be helpful to publicise preferred locations for scattering ashes (<i>see response to point 30 above</i>).
36	Add bathing waters to the list of “not to use” locations, due to the consideration of coastal bays and swimmers.	1	We feel that it would be too restrictive to identify all bathing waters as unsuitable for scattering ashes. We agree that ashes should not be scattered near bathers and we have revised the policy to take account of bathers.
37	The Environment Agency should advise people not to throw ashes from bridges or river banks but to put ashes as close to the water surface as possible.	1	Agree. We have revised the wording of the policy to make the position clearer.
38	If people injure themselves by using the bank will the EA have responsibility?	1	The Environment Agency has no legal responsibility for people injuring themselves while scattering ashes.
39	Should the EA advise people to take care when scattering ashes on a river?	1	This is not within the remit of the Agency.
40	Suggest adding following clause to section of the policy on scattering ashes: “Do not spread ashes on Inland Waters unless the ashes have been reduced to a friable consistency by means of a recognised Cremulator.”	2	<i>Our policy refers to ashes, not to recognisable human remains. We believe that this is clear in the wording of the policy.</i>

41	Any litter cast upon the water or left behind during ash scattering ceremonies may pose threats to wildlife & the environment & may cause distress to river users.	1	Agree. This is covered in our policy.
42	Some advice should be given to discourage the placing of memorabilia in the general vicinity.	1	Agree. We have strengthened the reference to not leaving memorabilia at the waterside.
43	Concern that floral tributes containing a high level of plastic are being thrown into the river.	1	Agree. The policy makes clear that floral tributes should not be thrown into the water.
44	Guidance should be issued to the florist industry to encourage an alternative to plastics used in floral tribute construction to reduce environmental impact from these items	1	This is a valuable suggestion, but lies outside the remit of the policy.
45	Non bio-degradable items are not to be used when scattering ashes on water.	1	The policy recommends that <i>only</i> the ashes should be put in the water. We are also discouraging people from leaving tributes or materials on the river bank.
46	Possibility of a record of frequency and location of the scattering of ashes in rivers.	1	We have considered this proposal but believe that the resources involved would be disproportionate to any risk posed by the scattering of ashes.
47	Crucial to monitor sections of a river site used for scattering ashes to consider the impact on it.	1	The policy aims to avoid continual use of a small number of sites for scattering ashes. The Agency routinely monitors water quality at a large number of points throughout England and Wales. We also rely on people to report any evidence of damage to the environment as a result of human activities.
	2. Home burials		
48	Should reference be made to woodland burials?	1	The policy refers to home burials. Woodland burial sites are treated as cemeteries and are outside the scope of the policy.
49	No legal requirement for the local authority to be consulted with regard to private burial at home.	4	We agree and have changed our policy to make this clear.
50	There should be no objections from Local Authorities.	2	We have checked this point and believe that there is no legal requirement for the local authority to be consulted with regard to private burial at home.
51	Not aware that Justices have power to dictate that the burial place should be a cemetery should the deceased person have died from a notifiable disease or	1	We agree that the earlier draft of our policy misrepresented the situation. We have changed the wording of the policy.

	ailment.		
52	There should be some mention of the Environment Agency's relevant duties and powers. The Environment Agency has no legal power to refuse permission for a home burial, including in cases of a person dying of a notifiable disease.	7	We agree and we have changed the wording of our policy to make this clear.
53	Need clarification of what is covered by "notifiable diseases"	1	This section has been re-written and clarified.
54	Though restrictions may be placed on the disposal of bodies of those who have died from a notifiable disease, that is not done in every case.	2	We have re-written and clarified the section referring to notifiable diseases.
55	The statement "there should be no objections from other agencies, such as the local council" needs clarification.	2	We agree and we have changed our policy to clarify this point.
56	How is a person to know whether 1m of soil exists below the coffin unless they excavate it?	1	<i>A trial excavation in the base of the grave is probably the simplest means to determine the depth of subsoil.</i>
57	Single graves must be 6ft deep, double graves 8ft deep.	1	<i>We do not believe this is a requirement for the protection of water quality.</i>
58	The prohibition of burial in "very sandy soil" is likely to cause confusion and conflict because there is no definition of "very sandy soil" and there are many areas of the UK where sandy soils are common.	1	Advice on whether soil in a particular area is very sandy can be given by a local Environment Agency officer, based on a sound understanding of local conditions, previously published Agency tools such as the Groundwater Vulnerability Map series – and soil data from the National Soils Research Institute. There will be some areas of the UK where very sandy soil predominates.
59	Water often seeps into graves over a period of time: graves should be left 24 hours before use, to ensure that water is not seeping in.	1	We agree that this is good practice, although, we do not require that graves be left for 24 hours.
60	The sentence about foraging animals is irrelevant	1	We agree that the having stipulated the depth at which the body should be buried, the sentence about foraging animals is unnecessary. We have changed our policy accordingly.
61	Burial of domestic pets' bodies is likely to be more damaging to environment than human home burials.	1	The Environment Agency's proposed policy relates to funeral practices for humans.
62	There is a lack of pet crematoria and cemeteries	1	This issue is outside the scope of the proposed policy
63	A presumption by the Environment Agency to support natural burials would be sensible.	1	We agree that the natural burial approach seeks to reduce harmful effects on the environment. We have added a reference in our revised policy to the Natural Death Centre as a source

			of useful information.
64	The EA should support natural burial which encourages the use of green material and discourages embalming.	2	This is an interesting proposal and we are considering how to include this kind of advice in future communications.
65	The Agency could give advice on recycling/reusing plastics, oasis, etc in floral tributes and composting the green material	1	This is an interesting proposal and we are considering how to include this kind of advice in future communications.
66	Coffins constructed of chipboard emit pollutants when cremated. The EA should issue guidance on products that have a less harmful impact on the environment. Cardboard, bamboo and wicker coffins are mentioned.	2	The Environment Agency does not issue advice on specific products. We are considering how to provide general advice on reducing pollutants in future communications.
67	Policy mentions only coffins to contain the corpse – failure to mention shrouds, etc could give rise to queries.	1	We appreciate this clarification and have changed the wording of the policy accordingly.
68	Consideration needs to be given as to how permanent the resting place will be.	1	This is an important consideration, for emotional and legal reasons. However, it is not relevant in terms of environmental protection, which is the focus of the Environment Agency's policy.
69	Who is the rightful person to make application for the disinterment of any remains?	1	We do not have a remit to become involved in procedures for disinterment.
70	Burials in private gardens should be put on the deeds of the house.	4	. We do not have a remit to deal with legal aspects of home burials, however we will provide links from our policy to organisations like the Natural Death Centre which can provide further advice on this. At present the landowner must have a land burial register which s/he retains.
71	Burial at home could be a potential problem for future owners of the property/land	2	This is an important consideration for the bereaved. However, it lies outside of our remit.
72	Recommend ownership of land in which a corpse is buried should be secure for a sufficient time for it to decompose,	1	This is outside our remit.
73	EA & World Health Organisation have outlined the ideal conditions for hygienic burial – these conditions should be supported.	1	The policy seeks to reflect national and international science and good practice.
	Other comments		
	• General		
74	Concern at the amount of formalin either released into the air via cremation or the ground via burial.	1	Although this is an important point which we will consider in relation to crematoria and cemeteries, it is not directly relevant for this policy.
75	Should mention that the Agency's advice is free.	1	A reference to this has been added to the policy.
76	EA should ensure it is second nature to	1	It is our policy to consult our

	consult the various groups involved.		stakeholders on all major decisions.
	• Environmental impacts of cremation		
77	Metal residue from cremation should cause more concern than home burials in the UK.	1	The subject of metal residues from cremation is not within the scope of this policy. Our Process Industry Regulation team deals with the environmental impact of crematoria.
78	Croydon Council plans to introduce shift working of cremators to increase efficiency.	1	We welcome this initiative by Croydon Council.
79	The Institute for Cemetery and Crematoria management has launched a scheme for the recycling of metals following cremation.	1	We welcome this initiative by the ICCM.
80	The Environment Agency might consider the possibility of practices other than burial or casting of ashes on water following cremation.	1	If alternative practices are proposed, we will consider their environmental impact.
81	Burial of metal residue from cremation illegal since implementation of Environment Protection Act 1990	13	Agree. This does not affect the aspects covered in the policy.
82	Can an individual cremation authority apply for a Waste Management Licence?	13	This issue is not within the remit of this policy.
	Monitoring effectiveness		
83	How will the effectiveness of the policy be managed & regulated across the Agency?	1	We will know if the policy is being effective by the amount of complaints that we receive. If we receive complaints about particular stretches of water, we will take further action. We believe that this is a proportionate response, given the small environmental risks involved.