



Use of Auto Shutdown Functions in Crematoria

Introduction:

Crematoria nationwide are currently managing cremation equipment which features an auto shutdown facility for use at the end of a working day. Manufacturers guidance suggests that this function may be used after an agreed amount of time (usually detailed in the operating manual) following the charging of a coffin, allowing the cremator to be turned over into an 'auto shutdown' mode and allowing the crematorium technician to leave the building whilst the cremation concludes unattended.

This guidance note has been produced in order to clarify inconsistent approaches to the use of this function and to assist in understanding an Authority's legal obligation to comply with its operating permit, whilst also considering the effect that such a process could have on bereaved people who are currently unaware of this practice.

Current Situation:

Having surveyed ICCM members in October 2018, results showed that 97% of cremators provided in participants' crematoria had an auto shutdown function available and that a significant 54% of authorities were regularly using this as part of their working day.

The ICCM believes that any cremation completed using this function is potentially using residual heat from the cremator and poses a larger issue with non-compliance of a crematorium's operating permit should the cremation not be completed prior to the cremator shutting down.

The Process Guidance Note 5/2 (12) Statutory Guidance for Crematoria (PG5/2 (12)), states that Particulate, Carbon Monoxide, Temperature and Oxygen values are required to be continuously monitored throughout every cremation service. PG5/2 (12) further highlights that the operator should respond to problems which may have an adverse effect on emissions to the air. In the case of abnormal emissions, malfunction or breakdown leading to abnormal conditions the operator should:

- Investigate and undertake remedial action immediately,
- Adjust the process or activity to minimise those emissions, and
- Promptly record the events and actions taken.

The regulator should also be informed of these points.

It has been confirmed with several cremator manufacturers that when selecting the auto shutdown mode, the cremator will continue to monitor the cremation for a maximum of 90 minutes from the original charging time (i.e. if selected after 25 minutes, the monitoring will continue for 65 minutes; alternatively if selected after 45 minutes, the monitoring will continue for another 45 minutes). Therefore, should a cremation exceed 90 minutes, this would also result in a direct contravention of the monitoring requirements contained in PG5/2 (12). It would also be impossible for an operator to report how many breaches they have had on any day, due to there being no records generated once monitoring has ceased, and again, with no operator in attendance.

Opinion has been sought from the Environment Agency and DEFRA on the use of the auto shutdown facility and the advice thus far has been that the Environment Agency will only regulate sites that directly report into them.

The ICCM advises crematoria that the use of cremating with residual heat is clearly opposed within previous guidance notes relating to the cremation processes of babies and infants.

In 2016, the Joint Guidance on Baby and Infant Cremations issued by the ICCM, FBCA, APCC and CSGB stated that:

'Overnight cremations with the cremator turned off should not be considered, as these would contravene the conditions within the crematorium authority's environmental permit.'

Further, the Report of the Infant Cremation Commission chaired by Lord Bonomy, offered that such overnight cremations should only be conducted with the family's consent. In addition, Scottish Government working group meetings have found that not only is the process of leaving cremated remains on the hearth overnight to cool an unattractive prospect to bereaved parents, but also there are parallels to be drawn from the current practices between both infant and adult cremations.

The ICCM believes that the deceased and their bereaved families, should expect a respectful and legally compliant cremation service on every occasion, regardless of the deceased's age, driven by learning from previous industry inconsistencies.

Clarification has been obtained from cremator manufacturers that the auto shutdown can be removed from a cremator's programmable software (in some instances for a fee) to ensure that the option to choose this function is withdrawn.

Conclusion:

Members should be aware that using the auto shutdown facility could result in questions being raised on whether the cremation had actually completed before shutdown commenced. It is obvious that this question cannot be reliably answered as no technician would be present to assess whether the cremation had been completed. The ICCM feels that this could potentially bring accusations of unethical and illegal practice, which could consequently reflect badly on the cremation movement and for some cremation authorities to be seen as untrustworthy. Members should again be reminded of the impact of the Lord Bonomy and Dame Angiolini investigations in Scotland regarding baby and infant cremations and treat deceased adults in the same manner as deceased children. The joint guidance issued by all cremation sector organisations in respect of baby cremations clearly prohibits cremation utilising residual heat, therefore it is suggested that the same ethical principle should be applied in respect of adult cremations. The ICCM will review and revise the Guiding Principles for the Charter for the Bereaved to specifically include and reflect this guidance.

Recommendations:

For the reasons outlined above, and from both an ethical and legal perspective, the ICCM recommends that:

- Each cremation that is accepted by a crematorium authority should be cremated in its entirety with the attendance of a suitably qualified cremator technician overseeing the entire process.

- If a cremation is the last of any given working day, the above point shall apply, and the cremator shall be shut down under normal conditions once the last flicker of flame has ceased*.
- As a minimum, for adults, the ashes should be raked down from the cremator hearth into the cooling well before the technician leaves site. For babies and infants cremated using a baby tray, it is acceptable to allow the remains to cool down at a slower rate within the tray on the hearth of the cremator once the cremation has completely finished under a qualified technician's supervision.
- In the event that the auto start cremator function is to be used, the ICCM supports the 'Infant Cremation: Cremation Practice Guidance' in that: *'Where remains are to be left to cool overnight within the cremator, automatic pre-heat settings on cremators must not be activated under any circumstances'*.

**This does not imply that the cremulating stage must also be completed at this time, rather that the cremation shall be completed under supervised conditions in order to shut the cremator down.*

31st May 2019