



Institute of Cemetery & Crematorium Management



Response to the Environment Agency consultation on:

Funeral Practices and the Environment

1. Spreading Ashes on Water

The Institute believes that there is no evidence to support any view that the spreading of human ash over water has a detrimental effect on the environment. Human cremated remains are an inert substance with no known pollutant properties.

The Institute believes that research is required into the custom of dispersing ash over water in order to identify and evaluate the numbers of such dispersals that take place, their locations and any potential risks that might be present.

The requirement of certain Asian communities to disperse the ashes of a deceased person over running water reduces the risk of any localised build-up. Having said this there is no evidence of any particular locations within the UK that are preferred by such communities. Statistically, the communities that require the dispersal of ash over water form a minority percentage of the population.

With angling being the most popular participating sport in the UK there may exist cases where the ashes of deceased anglers are dispersed over favourite fishing spots. In these instances such ashes might be dispersed over running or still water. Again, such dispersals are likely to be in the minority and not in any concentrated areas.

The Institute is more concerned with the modern floral tributes that contain a high level of plastic being thrown into the water at the point where ash is dispersed.

The Institute believes that the bereaved should be given information concerning the dispersal of ash and floral tributes over water and can assist with this via its contact with all UK crematoria. Detailed guidance can be placed within the Institute's Charter for the Bereaved from which cremation authorities draft public information sheets. Contact with allied organisations covering funeral directing can assist with provision and dispersal of sound information.

The Institute supports the view that permission of the landowner should be sought prior to any dispersal on privately owned land. This could extend to permission of the Environment Agency for dispersal over water. Permission could be obtained via email in order to reduce delays to bereaved persons wishing to carry out this practice and could be free of charge in order to not add to the financial burden. Statistical information collected via license applications in respect of numbers of such dispersals and locations would indicate any patterns that might exist. The Institute could be instrumental in producing guidance for crematoria and the public as indicated above.



2. Home Burial

The Institute is of the opinion that only a very small number of home burials take place each year. The burial of domestic pet's bodies in the gardens of private residences, via the waste routes to landfill sites and in rivers and on public land is likely to be more damaging to the environment than home burials of humans.

The statement 'if the deceased person died from a notifiable disease or ailment, they may not be buried at home' requires clarification and explanation. The Institute believes that the Environment Agency has no power to prevent the burial in a cemetery of a person dying in such circumstances and that this might extend to a home burial (burial in private land).

The Institute believes that agencies such as local councils cannot legally object to home burial provided that the person effecting the burial is the landowner or has the permission of the landowner.

The person effecting a home burial might not necessarily know if one metre of soil exists below the coffin unless they actually excavate this.

One metre of soil above the coffin is sufficient to prevent disturbance by foraging animals. The law relating to local authority cemeteries (Local Authorities Cemeteries Order 1977) is specific regarding depths of burial and states that no body shall be buried in such a manner that any part of the coffin is less than three feet below the level of any ground adjoining the grave. This rule can be extended into any public guidance issued in respect of home burial.

Other Areas of Impact

3. Disposal of Metals following Cremation

At the present time approximately 400,000 cremations take place each year at UK crematoria. Each of these cremations produces metal residue in the form of orthopaedic implants such as hip and knee joints, pins and plates used in surgery and small metallic items used in coffin construction. It is current practice at UK crematoria to remove metals from the remains and bury the same within the grounds of the crematorium. Cremation authorities have taken the view that such metals which are not claimed or wanted by the vast majority of the bereaved, should not be disposed of via conventional waste routes due to the sensitivity of the subject.

The Environment Agency's Policy Unit has stated that once metals are removed from the ash such metals constitute waste and must therefore be disposed of in accordance with waste management legislation. Applications for a landfill licenses at crematoria is again a sensitive issue with authorities most likely being opposed to this option for achieving legal compliance due again to the sensitivities of the subject and the nature of the sites concerned.

For the above reasons the common practice of burial of metals within crematorium grounds continues with no enforcement action being taken by the Environment Agency



due to there being no acceptable and sensitive alternative method for the disposal of metals.

The Institute has recently launched a scheme for the recycling of metals following cremation, which take on board Counsel's opinion and the statements issued by the Environment Agency (Recycling Scheme pack attached which contains full legal opinion and operational information). Enforcement has probably not been considered due to the sensitivity of the practice of burial of metals within the grounds of crematoria and the fact that there has been no alternative to the practice until now. The Institute's scheme now offers the only lawful alternative that takes into account the wishes of the bereaved and the protection of the environment.

Whilst the scheme is available cremation authorities and companies have been slow to change current practice.

The full Recycling pack is attached as an appendix to this response.

4. Floral Tributes

It is evident that floral tributes are present at the majority of funerals that take place in each year in the UK. With approximately 600,000 burials and cremations annually, literally million floral tributes will be deposited at the nations cemeteries and crematoria in any given year.

The majority of tributes are constructed using a plastic tray into which a block of 'Oasis' material is fixed. The flowers are then inserted in the 'oasis' material. 'Oasis' is expanded, rigid plastic foam and is used for its water retaining properties. Many tributes are finished using plastic ribbon and plastic cardholders.

Whilst the plant material contained in the floral tributes can be removed for recycling this is not the case for the large amounts of plastic materials used in the construction of the tributes.

It is customary for tributes to be deposited at the crematorium or at the graveside where they are left for a period of time. It is then for the authority to dispose of any that are not collected by families of those deceased persons. It is normal practice for authorities to dispose of faded tributes via conventional waste routes with the majority being ultimately deposited in landfill sites.

Whilst some authorities will spend resources on removing the plant material for composting there is no route for the recycling of the plastics this not being a commercially viable option for private sector recycling companies.

The Institute believes that guidance should be issued to the florist industry in an attempt to encourage an alternative to plastics used in floral tribute construction and consequently reduce the environmental impact from these items.



5. Operation of Cremation Equipment

At present cremator operating time in relation to usage of fossil fuel, reduction of harmful emissions and efficiency is overlooked.

It is current practice to pre-heat cremators at the start of each day and cool them down after the last cremation of the day and repeat this process throughout the week. Apart from the excessive use of fossil fuel for daily pre-heating, the risk of emissions of pollutants from the first cremations of each day is increased.

Holding cremations over for a limited period will allow continuity of use with resultant reductions in fuel consumption. Industry codes of practice have attempted to address this situation with the Federation of British Cremation Authorities code stating that the cremation should take place within 24 hours of the funeral service whilst the Institute of Cemetery & Crematorium Management's Guiding Principles for the Charter for the Bereaved states 72 hours. Despite these codes of practice being in existence very few crematoria hold cremations over for any period. This lack of action by authorities is perpetuating the impact on the environment.

The Environment Agency should form a working group comprised of interested organisations in order to formulate policy and guidance on operational aspects of crematoria designed to reduce environmental impact.

6. Natural Burial

The Institute believes that the Environment Agency should support natural burial (also referred to as green, environmental, meadowland or woodland burial) on the basis that this form of burial encourages the use of green material and discourages embalming. The planting of trees at woodland burial sites has the effect of locking carbon with the vegetation holding water and thereby reducing the risk of pollution.

This concept also encourages the use of cardboard coffins and floral tributes containing only natural materials.

7. Embalming

The Institute is concerned at the amount of embalming fluid (formalin) that is either released to air via cremation or leached into the ground via burial. The blood removed from the embalming process is also released via the public drains.

Research should be carried out in order to identify a less harmful fluid for use in the embalming process.

8. Post Mortem Examinations (Autopsies)

The Shipman Inquiry reported that a high level of post mortem examinations are carried out annually in the UK and recommended that the number should be reduced. Blood is released into public drains via post mortem examinations therefore the environmental benefits from such a reduction are self-explanatory.



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9. Coffin Construction

The majority of coffins used for burial and cremation are predominantly made from chipboard; a product that emits pollutants when cremated. The Environment Agency should issue guidance on alternative products that have less impact on the environment.