



NORFOLK COUNTY Cemetery Master Plan

LEES
ASSOCIATES



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ACKNOWLEDGEMENTS

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EXECUTIVE SUMMARY

Norfolk County's cemetery system is rapidly expanding as the post-amalgamation government takes on responsibility for existing cemeteries throughout its areas. These cemeteries are urban and rural and operate from active and semi-active to inactive, though the County has obligations for maintenance no matter the level of activity a cemetery sees. Some of these cemeteries, whether abandoned or inherited from private ownership, bring with them unique issues.

The County's cemetery system relies on funding through the municipal tax levy, as with most Canadian municipal cemetery systems, which prioritize public service over revenue and are not financially self-sufficient. The operational and administrative demands of Norfolk County's expanding cemetery system compound this issue.

There is an opportunity to make changes and implement strategies to address these issues at this critical juncture. This Plan presents Norfolk County with clear and efficient recommendations to take on and manage new cemeteries, gain operational capability, and steer its finances toward improved self-sustainability. This Master Plan will guide the creation of such a system, outlining actions to be taken in the short, medium, and long term.

LEES + Associates has 25 years of cemetery planning and design experience throughout Canada, the USA, and internationally. Its landscape architects, planners, and accountants have unmatched industry experience and technical proficiency to understand the unique needs of Norfolk County and develop solutions specific to the County's cemetery system that are sustainable and enduring.

Multiple areas of this Plan's approach align with Norfolk County's Strategic Plan. Examples include improving service levels, striving for sustainability, community engagement, and processes of continual improvement.

KEY FINDINGS

CURRENT STATE SUMMARY

Norfolk County is responsible for a growing portfolio of cemeteries. Key findings from an examination of their current state include:

- Oakwood Cemetery in Simcoe is the most active and equipped cemetery addressing the community's needs. Currently, about 90% of the County's interments happen here. With land to the south now planned for development, acting soon the County still has an opportunity to address land use needs for this site for the next 100 years.
- Delhi Cemetery was formally transferred to Norfolk County by the Bereavement Authority of Ontario (BAO) effective January 2, 2025. This transfer is expected to increase the total interments done by Norfolk County by approximately 40%, making this site the County's second-largest cemetery under Oakwood. The additional operational pressure from increased interment is expected to more acutely reveal the gaps and pressures that have been building with the transfer of multiple smaller cemeteries over the past 5 to 10 years.

- The cemeteries are located across a large geography, and cemetery operational equipment is sourced from Oakwood Cemetery in the Town of Simcoe. Recognizing that this creates inefficiency due to additional costs for long travel distances, the County employs contracted services for certain cemetery activities such as grave-digging and groundskeeping based on location.
- Norfolk County currently does not offer special sections at its cemeteries for specific ethnic or non-Christian groups. Given its current demographics, no change is needed currently. Regional trends, however, show a diversifying population, and Norfolk County is within commuting distance from several large cities. Cemeteries must be designed to adapt to new offerings that respond to market demand and changes in burial practices.

DEMAND AND NEED ANALYSIS

Historical Interments

From 2019 to 2023, Norfolk County interment type breakdown can be expressed as follows: An average of **14%** of Market Area community members chose casket burial interment, and **15%** chose cremation interment at a municipally run Norfolk cemetery. This rate of casket market capture is below average for similar municipal cemeteries, while the rate of cremation market capture is higher than average.

From 2019 to 2023, the County's cemeteries provided:

- 281 casket lot burials, averaging 56 per year;
- 544 in-ground cremation burials, averaging 109 per year, and
- 46 cremation niche inurnments, averaging 9 per year.

Projected Interments

- Over the next 25 years, the County's cemeteries are projected to provide:
 - 1,300 casket lot burials, averaging 50 per year, representing a projected decrease in interments of 11%;
 - 4,160 in-ground cremation burials, averaging 165 per year, representing a projected increase in interments of 27%; and
 - 325 cremation niche inurnments, averaging 13 per year, representing a projected increase in interments of 31%.

Historical Sales

- From 2019 to 2023, Norfolk County sold to community members:
 - 401 casket lots, averaging 80 per year; and
 - 85 cremation niches, averaging 17 per year.

Projected Sales

- Over the next 25 years, Norfolk County Cemeteries are projected to sell:
 - 1,900 casket lots, averaging 75 per year, representing a projected decrease in sales of 6.5%;
 - 600 cremation niches, averaging 24 per year, representing a projected increase in sales of 29%

Delhi Transfer

- The impact of an additional 40% increase in interments through demand at Delhi Cemetery is not factored into the numbers above.
- Delhi Cemetery interments tend to include more traditional casket burials due to the demographics of this locality, with an estimated breakdown of 50/50 casket to cremation interments.

PRODUCTS, SERVICES, AND FEES REVIEW

The following section is a summary of the key findings from this plan's products, services, and fees review:

- Norfolk County currently has a high demand for cremation interments but just two types of cremation interment options. Most cremated remains are presently interred in casket lots, with the remainder in columbaria. An expanded range of cremation options may help shift market interest and preserve casket lots for casket burial. The impact of a 2016 bylaw change that increased the number of interments per casket lot to six from three interments resulted in existing cremation lots being less desired to the market. As a result, no cremation lots have been sold. Further, the existing cremation lots have been effectively removed from sales offerings due to both lack of demand and poor layout. The intent is to revisit the use of these spaces at a later time. In reviewing this service, it may be revealed that smaller lots could open up a new niche market while improving use of available land.
- The County might also consider new cremation products: family columbaria (also known as estate niches), family cremation estates, scattering garden services, and family vessels. This also presents the opportunity to offer various cremation memorialization options, such as engraved plaques on memorial walls in new locations other than at the columbaria sites
- Norfolk County's in-ground burial lot fees and casket burial services are lower than the benchmark community's averages. Given the resources needed to manage a growing portfolio of cemeteries, increasing these fees to align them with the regional cemetery market would be justifiable and warranted.
- An expanded range of full-body burial options may better serve the County's growing population, respond to specific burial practices such as the directional orientation for religious groups such as Muslims and Greek Orthodox, and cultural shifts towards low carbon approaches such as green burial.

- There are opportunities to add new revenue streams by expanding the County's interment, memorialization, and support service options at its cemeteries.
- The County's development of a new columbarium Section at Oakwood Cemetery in 2024 will improve immediate availability of this type of service. With additional columbaria included in the 10-year capital plan, and the site capable of accommodating seven further units, the County is ensuring an available supply for the foreseeable future.

Public demand is increasing for green burials. While demand in Norfolk County is currently low compared to urban centers, this is a service Norfolk County might wish to consider in future if both demand and land use/availability allow. If this service is considered for Oakwood Cemetery, its implementation will depend on the availability of suitable land.

FINANCIAL SUSTAINABILITY ASSESSMENT

To ensure its financial sustainability, the County should consider measures to increase its revenue, decrease operating costs, and accelerate the growth of its Care and Maintenance Fund (C&MF). Changes to cemetery pricing (revenues) and financial practices (costs) are the two key focuses that would reduce the tax subsidy required to support the County's cemetery operations.

Currently, at close to \$1,300,000 in the County's C&MF, annual interest covers just 15% of annual maintenance costs. To independently support Norfolk Cemeteries' care and maintenance costs, the County would need:

- \$8,900,000 in its C&MF to fully cover the cost to provide its current level of care at its current annual rate of return.
- \$4,500,000 in its C&MF to cover the cost of providing the minimum level of care required at its current annual rate of return.

From 2018 to 2022, Norfolk Cemeteries reported:

- An annual, average total levy impact of **\$230,000** before C&MF + Reserve Fund Contributions.
- An annual average levy impact of **\$286,000** after C&MF and Reserve Fund Contributions are deducted
- Its C&MF earned an annual average of **3.5%** in investment income. This is on par with the typical rates of return earned by cemeteries' C&MFs in Ontario.
- Its C&MF income was an annual average of \$40,400. This would cover **15%** of the care and maintenance costs reported to the BAO during this period.
- An annual average of \$311,000 in care and maintenance costs was reported to the BAO.

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1 INTRODUCTION

Norfolk County has undertaken a comprehensive study to develop a high-level Cemetery Master Plan to guide its cemeteries' future development, operation, care, and maintenance. The purpose of this master plan is to provide a holistic and forward-thinking cemetery management strategy for the County. This cemetery system is becoming complex as more cemeteries fall under its purview. To create a foundation for future success, the County may consider the recommendations outlined in this Plan as strategies to work towards long-term operational sustainability. The County commissioned LEES+Associates, a cemetery specialist consulting firm, to execute the study collaboratively with the County staff.

This master plan primarily focuses on the 22 most active cemeteries managed by Norfolk County, with Oakwood and Walsh United being the busiest. Additional cemeteries, such as Delhi, are being integrated or anticipated to join the system. The procedures outlined in this plan are designed to apply to all future cemetery acquisitions.

A key driver in any cemetery planning work is understanding the anticipated growth in the community population and the related death rates and identifying a strategy for managing care. This information allows cemetery planners to accurately plan for appropriate products and services, site planning and expansion needs, and care and maintenance for the future.

This plan includes:

- A **current state summary** of the cemeteries' market area and an analysis of the cemetery sites within the County's portfolio. This included an analysis of the market area's demographic profile and disposition trends and the function of the County's cemetery sites.
- A **cemetery demand-needs analysis** that identified current and projected interment and sales capture rates to determine the remaining sales capacity and future development needs.
- A review of **products, services, and fees** to compare and identify disparities in comparable market rates and the range of offerings.
- An overview of **public engagement** outcomes from consultation with key stakeholders and cemetery staff.
- A **financial sustainability assessment** of pricing practices, an evaluation of the cemetery system's current ability to recover short-term operating costs, an analysis of its future financial trajectory, and a review of the long-term sustainability of its Care & Maintenance Fund.

This master plan provides a clear set of recommendations to guide Council and staff in making decisions regarding managing the overall cemetery portfolio and ensuring an appropriate quantity and mix of cemetery inventory and services to meet the needs of an increasingly diverse community.

1.1 PURPOSE AND OBJECTIVES

Since amalgamation in 2001, and with recent acceleration, Norfolk County has assumed responsibility for numerous cemeteries within its boundary. The goal of this Master Plan is to give the County a dynamic plan for managing its current cemeteries and those it takes on in the future while working towards improved sustainability.

Purpose

- Create a guiding document for the Norfolk County's cemetery system.
- Focus management of cemeteries towards systemic approach.
- Develop operational priorities to manage workloads.

Objectives

- Identify an operational approach reflective of the needs.
- Create a Plan to guide the County as it takes responsibility over more cemeteries.
- Within the Cemeteries Master Plan, provide strategic directions and recommendations that will ensure the sustainability of the County's Cemetery Services over the next 25 years.
- Determine future demand for cemetery services and identify opportunities for cost recovery and prioritization.
- Develop a high-level physical site analysis to estimate and optimize the inventory and potential at County cemeteries.

2 CURRENT STATE SUMMARY

This section includes information on Norfolk County's inventory of cemeteries, their level of usage, and their physical condition.

2.1 KEY FINDINGS

Norfolk County is responsible for a growing portfolio of cemeteries. Key findings from an examination of their current state include:

- Oakwood Cemetery in Simcoe is the most active and equipped cemetery addressing the community's needs.
- The cemeteries are located over a large geography, with most operational equipment/staffing resources sourced from Oakwood Cemetery in the Town of Simcoe. To address the inefficiency and additional costs of long travel distances, operations tasks such as grave-digging and grounds keeping are contracted out at various locations
- Norfolk County currently does not offer special sections at its cemeteries for specific ethnic or non-Christian groups. Given its current demographics, no change is needed at this time. Regional trends, however, show a diversifying population, and Norfolk County is within commuting distance from several large cities. Cemeteries must be designed to adapt to new offerings that respond to market demand and changes in burial practices.
- Rural cemeteries receive a lower level of maintenance and have reduced access and limited accessibility provisions.
- Although this has been addressed on a smaller scale within operations, establishing cemetery categories along with corresponding service and maintenance standards will introduce intentional, system-based protocols to ensure long-term operational sustainability.
- Cemetery entry features and branding are often in disrepair and need repair, replacement, or enhancement. Identification of ownership, rules, and contact information is inconsistent or lacking.
- The cemetery administrative office is not AODA compliant for public accessibility, and Staff make arrangements to accommodate clients with this in mind. While this is functional, the County may wish to consider this as it relates to parallel initiatives such as a facilities review.
- Wayfinding and information signage within cemeteries (and online) are lacking, which is limiting the opportunities for cemetery tourism and general visitor attraction/engagement.

2.2 CEMETERY INVENTORY

The communities in what is now Norfolk County amalgamated to become a single municipality in 2001. Since that time, Norfolk County has been assuming responsibility for additional rural cemeteries that were previously managed privately. Norfolk County's most active cemetery is Oakwood Cemetery in Simcoe, but numerous rural cemeteries still serve their nearby communities and are testaments to their histories. **Figure 1** shows the locations of the County's cemeteries and the County's current classification of operation (inactive and active).

SAMPLE OVERVIEW OF NORFOLK CEMETERIES



LEGEND

● Active Cemeteries:

1. Bayview Cemetery – 127 Front Road
2. Clear Creek Cemetery – 1417 Lakeshore Road
3. Courtland Baptist Cemetery – 85 Talbot Street
4. Cultus United/Laycocks Cemetery – 738 6th Concession Road ENR
5. Delhi Cemetery – 205 James Street
6. Glen Meyer Baptist Cemetery – 28 Norfolk County Road 21
7. Goshen Cemetery – 736 Goshen Rd
8. Hartford Cemetery – 35 Cemetery Road
9. King Lake Cemetery – 1281 North Road
10. Oakwood Cemetery – 196 Vittoria Street
11. Teeterville Cemetery- 721 Ellington Lane
12. Ukrainian Greek Orthodox Cemetery – 1325 Charlottesville West Quarterline
13. Walsh United Church Cemetery – 957 Charlottesville Road 5
14. Silver Hill Cemetery – 18 Charlottesville Road 8
15. Walsh Baptist Cemetery – 1338 Turkey Point Road

○ Semi-Active Cemeteries:

1. Bethel (Bethlehem) – Nixon Cemetery – 1138 Windham Road 14
2. Houghton/Hemlock Cemetery – 358 Lakeshore Road (Houghton)
3. Jacksonburg/Alton Cemetery – 968 Lakeshore Road
4. Jackson Cemetery – 1222 Col Talbot Road
5. Jericho Cemetery – 1258 Forestry Farm Road
6. Port Royal Cemetery – 2777 Lakeshore Road (Port Rowan)
7. Marston Cemetery – 163 10th Concession Road
8. Salem United /Atherton Cemetery – 2462 Hwy 3 West

● Inactive Cemeteries:

1. Bell Mill/Bostwick Cemetery (South Middleton Baptist Cemetery) 87 Bell Mill Sideroad
2. Bethel Brethren/Tunkard Cemetery – 1371 West Quarter Line Road
3. Cranberry Creek/Taylor Cemetery – 1731 Middleton N-W Townline Road
4. Doan's Hollow Cemetery – 407 St. John's Road East
5. Glenshee Cemetery – 132 McDowell Road East
6. Hazen Cemetery – 807 Norfolk Cty Road 60
7. McQueen Cemetery – 21 Tisdale Road
8. Mills Cemetery – 695 Queensway West
9. Morden Cemetery – 961 East Qtr Line (N Walsingham)
10. Mount Hope/Tyrell Cemetery – 1423 Concession 13 Townsend
11. Norfolk County Home Cemetery (Poorhouse Cemetery) – 44 Rob Blake Way
12. Old Methodist (Bostwick) Cemetery – 52 Falkirk Road
13. Old Windham Cemetery – 2415 Highway 24
14. Pinegrove Cemetery – 479 McDowell Road E
15. Potts Cemetery – 231 Decou Road

Figure 1: Cemeteries within Norfolk County. Source: LEES+Associates, Norfolk County, Google Earth

The cemeteries listed here are either those with higher sales/interment activity like Oakwood, or are otherwise indicative of the characteristics of the cemeteries for which the County is responsible.

The sample overview provides insight into the spectrum of cemetery site assets, key characteristics, and typical constraints. Images showcase the general size and landscape context of the sites as well as the street frontage view of the sites.

Cemetery entry features and branding require attention. Identification of ownership, rules, and contact information is inconsistent or lacking. Overall maintenance varies with sites experiencing a higher frequency of interments and visitors maintained in a higher state of care. Image Source: Google Aerial and Streetview, 2024

Oakwood Cemetery

Active (Urban)

Example of an urban cemetery with a high level of sales and interment.



Oakwood Cemetery, located in Simcoe, is the primary active cemetery in Norfolk County's cemetery system. It is one of the largest cemeteries in the County. It has historic significance, with graves from both World Wars

This cemetery sees the highest frequency of sales and burials in the County and is the main hub for operations.

Interment types available: columbaria niche, casket burial with upright monuments and flat markers, and provisions for in-ground cremation lots.

There are infill and expansion opportunities within the current property limits, however, there are some issues with soil suitability related to historical inert fill locations (buried tree stumps, etc.) that may impede some use.

Roads and paths allow this cemetery to serve a purpose both as a burial space and as a park-like area. The historic main entrance is blocked off due to problematic traffic related to the adjacent school. Conversely, new corridors have enhanced pedestrian access from adjacent housing developments.

Walsh United Cemetery

Active (Rural)

Example of a rural cemetery with a moderate-high level of sales and interment.



This is the most active rural cemetery in Norfolk County's cemetery system. Transferred to the County in 2023, this cemetery has maintained good records, and it is clear where space is available.

Interment types available: casket and in-ground cremation burial with upright monuments.

Roads allow for internal access and help with operations. There is space to expand grave lotting in the front and rear within the property boundary.

Grounds keeping is contracted.

King Lake Cemetery

Semi-Active (Rural)



Around 1-2 burials take place per year at this cemetery. Sales are similarly low.

While this cemetery is one of six operated by a hybrid board, groundskeeping is contracted out by the County.

Jericho Cemetery

Semi-Active (Rural)

An example of a rural cemetery with low interments; and where interments are difficult to execute.



Only burials for existing IRCs occur here. Groundskeeping is contracted out, as is some grave-digging.

There are no internal paths. This site's function is purely as a burial place. Due to poor historic record-keeping and unknown site conditions, burial requests based on existing interment rights are reviewed on a case-by-case basis.

This site is minimally maintained and does not accommodate visitors as a park space.

Delhi Cemetery

Active (New Addition)



While outside the scope of this study, Delhi Cemetery will be an active and important part of Norfolk County's cemetery system. It is expected to increase the County's total number of annual interments by 40%.

Delhi has a large internal road network and opportunities for infill and expansion within the cemetery property boundary.

The large site will require significant additional resources to operate and is a strong example of the impact and risk that the County faces in terms of resources as new cemeteries are taken over.

2.3 CEMETERY SYSTEM ANALYSIS

To simplify operations and expend resources efficiently and effectively, Norfolk County should consider managing its cemeteries collectively as a system rather than individual cemetery sites. While much of this is already being done on an operational level, intentional categorization and defined standards will strengthen this as a systemic approach. To accomplish this, the County must gain a more detailed understanding of the assets within the system and the role/function they play within the community; and alignment with County asset management initiatives will support this outcome. This section outlines methods for categorizing cemeteries and assigning resourcing to those categories.

CEMETERY FUTURE VIABILITY ASSESSMENT

Norfolk County operates and maintains 49 cemeteries, each with varying activity levels, from inactive to those with frequent interments. The County has a further 10 cemeteries on private lands under its provincial license and periodically monitors additional private sites to ensure compliance with Provincial regulations. Like the County's existing Cemetery Subsidy program, the latter two items are done as a means to support and/or monitor these sites so they may sustainably remain in private hands.

To ensure efficient and effective management, the County requires a methodology for making informed decisions regarding cemetery operations. This approach can help allocate resources based on each cemetery's activity level, ensuring that all cemeteries receive the same base level of care and remain well-maintained and presentable.

Cemeteries with higher usage and frequent interments require more funding and frequent upkeep. At the same time, those with less activity still need to be maintained to a standard that preserves their appearance and integrity, and complies with provincial regulations such as those related to Care and Maintenance. Establishing these operational categories and associated service and maintenance standards will ensure that all cemeteries, regardless of their level of use, are well-maintained and serve the community's needs effectively.

CEMETERY EVALUATION GUIDE

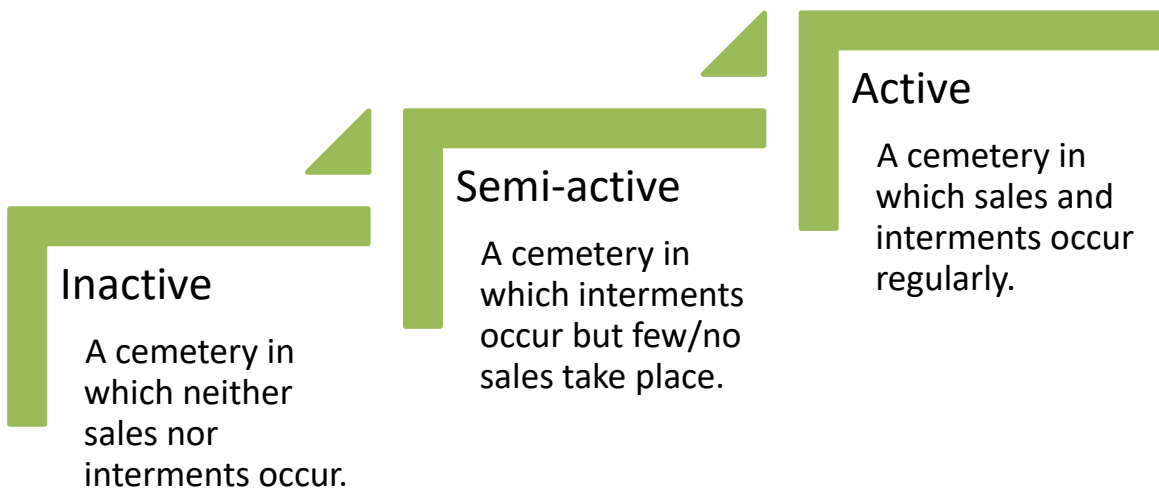
This guide outlines a step-by-step process for establishing, evaluating, and adjusting service levels for different operational categories of cemeteries: active, semi-active, and inactive. These steps ensure a structured approach to cemetery management, aligning operational capacity with financial sustainability and community needs.

1 | FORM AN INTERNAL CEMETERY WORKING GROUP

A cemetery working group should include members from cemetery management, administration, operations, and staff knowledgeable about the communities the cemeteries serve. This inclusive approach ensures a comprehensive representation of crucial aspects such as impacts on operations, maintenance, financial sustainability, and impacts on communities. While the functions of such a group are already being done, formalizing the activities under the working group banner would help enable a coordinated and planned approach.

2 | DEVELOP OPERATIONAL CATEGORIES

Cemeteries should be organized into three recommended operational categories:



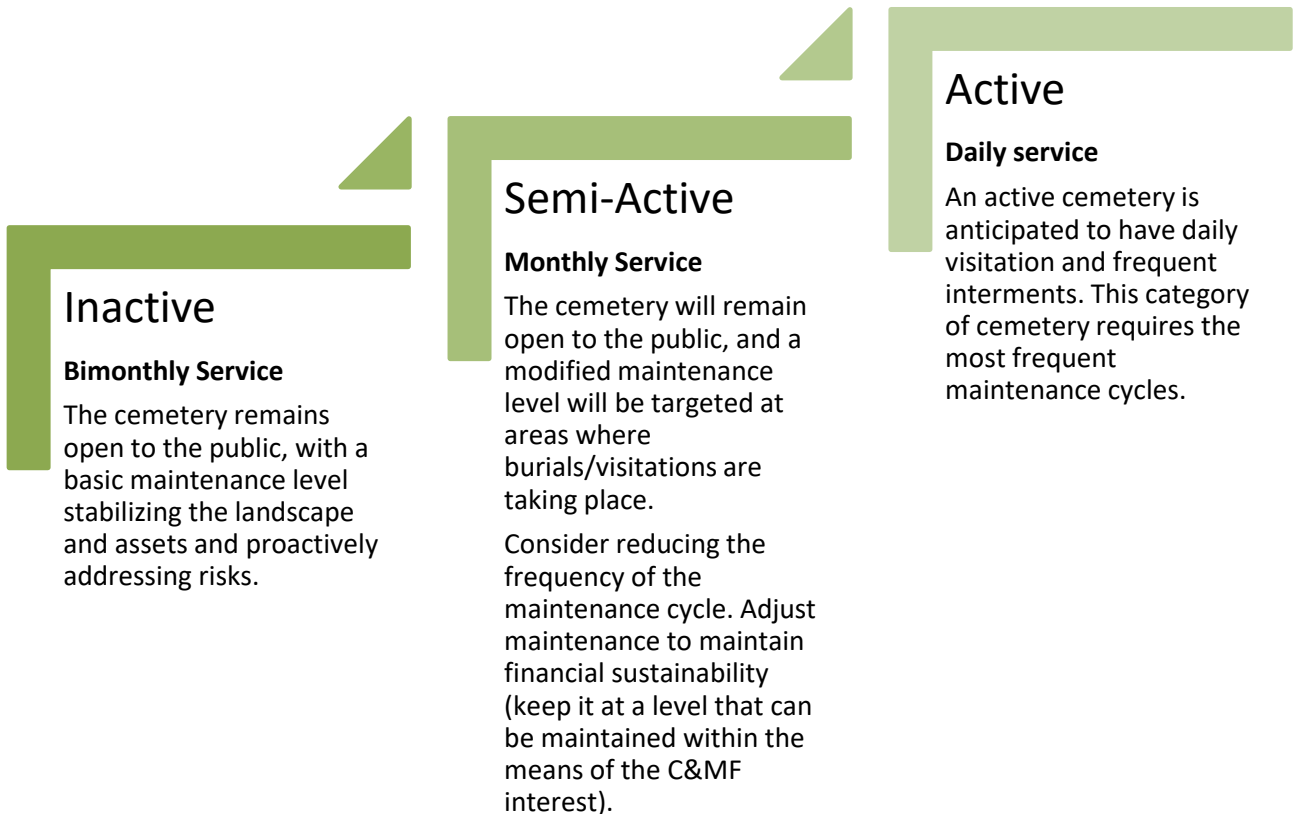
Three operational categories are used to simplify the evaluation process. Not all cemeteries will neatly fit into a category.

Before evaluating the cemeteries, it is necessary to have a general understanding of cemetery visitation frequency and service levels that will be applied for each category. The cemetery working group may work with other standards based on their knowledge of the County's operational capacity, financial limitations, and level of community interest.

These categories are the basis for determining the level of service needed at various Norfolk cemeteries. The standards can be applied with flexibility, but it is recommended that when a property is not maintained according to its recommended standard, a rationale be documented in an "Exception to Standard" form to be kept on file. When several similar exceptions are collected, a new standard could be developed, or an existing standard could be revised.

3 | DEVELOP SERVICE LEVEL STANDARDS

The following are recommended starting points for operational standards for the evaluation exercise. The number of categories is limited to three to simplify and clarify decision-making. (For more information on this approach, see section 6.2 –Operations & Administration.)



4 | EVALUATE AND SORT CEMETERIES

Work as a team to evaluate the cemeteries and sort them into the three operational categories using the decision matrix spreadsheet tool (see section 2.5 – Cemetery Management Decision Matrix).

Flag properties that don't appear to fit into any categories.

- Provide a rationale for not fitting into the given categories.
- Recommend criteria for a new category.
- Escalate to management level for decision.

5 | DEVELOP COMMUNICATION PLAN

Develop a communications plan around cemetery service levels for internal and external use. Ensure that public feedback is transparent and that feedback loops are closed promptly.

Existing Norfolk County platforms including News Releases, Social Media and the “Engage Norfolk” program are all examples of effective tools that would support this type of communication.

6 | CONDUCT INVENTORY OF EACH CEMETERY

Once the cemeteries have been evaluated and classified, an inventory for each cemetery should be conducted through site inspection and photo documentation.

- For reporting purposes, note where the current level of service differs or remains the same as the recommended level of service (No change, decreased level of service, increased level of service).

Conduct risk/hazard assessment documentation during inventory.

Work that Norfolk County is conducting in other areas will address and align with this objective. Examples of good working alignments include initiatives such as Facilities Reviews, Building Condition Assessments (BCAs), Asset Management Planning, and other Master Planning work.

7 | IMPLEMENT CRITICAL MAINTENANCE

Address critical maintenance at properties that fail acceptable risk thresholds. Repair, stabilize, or restrict access to mitigate risk. Develop a prioritized maintenance schedule based on risk assessments and allocate resources accordingly.

Examples already underway are hazard tree inspections and provincially regulated safety requirements associated with cemetery monuments.

8 | UPDATE THE PUBLIC

With a better understanding of the state of each cemetery and with complete critical maintenance, changes and updates can be communicated to the public. Anticipate feedback and engagement needs.

9 | APPLY RECOMMENDED LEVELS OF SERVICE AND MONITOR

Adjust current service levels to recommended levels. After one year, review and conduct satisfaction surveys with staff and the public. Adjust management practices where needed and communicate results to the administration and the public.

CEMETERY SYSTEM MANAGEMENT DECISION MATRIX

This cemetery system decision matrix is designed to help evaluate cemeteries to determine their operational categories (Active, Semi-Active, or Inactive). The matrix considers key factors such as current activity level, financial sustainability, contractual obligations, community impact, operational costs, future revenue potential, and volunteer support. Once an operational category is established for a cemetery, its operational and budgetary planning parameters are set.

The matrix should be used as a tool during strategic planning sessions, budget allocation processes, and whenever there is a need to assess cemeteries' current status and future potential within the cemetery system.

The matrix is a recommended framework to initiate discussion and should be adjusted to suit the needs of Norfolk County.

Criteria Scoring Scale

For this matrix, scoring is based on a scale of 1 to 5, with 1 being least desirable and 5 being most desirable.

$$\text{Weighted Score} = (\text{Criterion Score}) \times (\text{Criterion Weight})$$

Assumptions:

- Cemetery properties will be operated as cemeteries and not park spaces.
- The decision matrix is used to inform a broader decision-making process rather than being the sole factor in making decisions.

Criteria

1. Current Activity Level (Weight: 25%)	Scoring
This criterion measures the number of burials and lot sales within a given period, reflecting the cemetery's operational activity and demand. Generally, a higher activity level indicates a cemetery's ongoing relevance to the community and financial viability. The presence of a high activity level can help prioritize resources for cemeteries that need to meet immediate community needs while generating revenue.	1 = No sales, no burials 3 = No sales, some burials 5 = Sales, burials
Financial Sustainability (Weight: 20%)	Scoring
This criterion evaluates the existence and sufficiency of a Care and Maintenance Fund (C&MF) alongside the cemetery's ability to generate ongoing revenue through services and sales. Financial health is essential for the long-term operation and maintenance of the cemeteries. Those identified as having sufficient stable funding and revenue streams are more sustainable and reduce municipal budget burdens.	1 = No C&MF 3 = C&MF present, does not cover basic maintenance 5 = C&MF present, covers basic maintenance
3. Contractual Obligations (Weight: 15%)	Scoring
This criterion considers the legal and contractual commitments to burial rights holders, including requirements to maintain operations for future burials. Fulfilling contractual obligations is legally binding and ethically important. It ensures that contractual obligations are fulfilled and legal issues are avoided.	1 = No contractual obligations 3 = Some contractual obligations, but no new contractual obligations are being generated 5 = Multiple contractual obligations and new contractual obligations are being generated

4. Community Impact (Weight: 15%)	Scoring
This criterion examines the cemetery's social and emotional significance to the community, including its historical value and families' desire to bury in their local cemetery. Cemeteries often hold sentimental value and can serve as cultural and historical landmarks. Maintaining these spaces respects community heritage and individual family connections. If access to cemetery goes through private property, municipalities sometimes enter access agreements or enact easements to allow access for maintenance and the public.	1 = Little or no community interest 3 = Some community interest 5 = Active community interest; access, easement, and or access agreement
5. Mobilization Costs (Weight: 10%)	Scoring
This criterion examines the costs of mobilizing labour, equipment, and materials for the maintenance and operation of cemeteries. At a high level, it takes into account the costs associated with transporting labour and equipment, setting up and taking down equipment (where necessary), and any additional expenses incurred from moving resources to outlying cemeteries.	1 = High mobilization costs 3 = Moderate mobilization costs 5 = Low mobilization costs
6. Potential for Future Revenue (Weight: 10%)	Scoring
This criterion identifies opportunities to generate additional revenue by developing undeveloped cemetery areas, infill, and cemetery expansion. Poor records-keeping may fully negate this category.	1 = No potential for future revenue 3 = Moderate potential for future revenue 5 = Strong potential for future revenue

7. Volunteer Support (Weight: 5%)	Scoring
This criterion looks at the availability and reliability of volunteer support for cemetery maintenance. Volunteers can reduce operational costs and make the cemetery more relevant to the community. With dependable volunteer support, cemetery maintenance costs may become more sustainable.	1 = No volunteer support 3 = Some volunteer support 5 = Strong, stable volunteer support

Evaluation Scoring & Operational Categories

Below are evaluation score thresholds and related operational categories for demonstration purposes only. Knowledgeable cemetery staff must adjust these score thresholds to accurately reflect Norfolk County administration's needs.

Inactive Cemetery Score between 1 and less than 2.5	Semi-Active Cemetery Score between 2.5 and less than 4.0	Active Cemetery Score greater than or equal to 4.0
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CEMETERY SYSTEM MANAGEMENT DECISION MATRIX

The following is an example of the Decision Matix worksheet table developed for use by staff to record the assessment described in this section.

Category		A	B	C	D	E	F	G	100%	
Weight		25%	20%	15%	15%	10%	10%	5%		
Key #	Cemetery Name	Current Level of Activity	Financial Sustainability	Contractual Obligations	Community Impact	Mobilization Costs	Future Revenue Potential	Volunteer Support	Total Weighted Score	Comments
1	Oakwood Cemetery (Simcoe)	5	4	5	5	5	5	1	4.6	Category B and G is a guestimate, to be confirmed.
2	Bayview Cemetery	3	3	5	4	3	2	3	3.35	
3	Bethel Cemetery	1	1	2	3	3	1	2	1.7	
4	Clear Creek Cemetery									
5	Courtland Baptist Cemetery									
6	Cultus United/Laycocks Cemetery									
7	Glen Meyer Baptist Cemetery									
8	Goshen Cemetery									
9	Hartford Cemetery									
10	Hemlock Houghton Cemetery									
11	Jackson Cemetery									
12	Jericho Cemetery									
13	King Lake Cemetery									
14	Marston Cemetery									
15	Port Royal Cemetery									
16	Salem United / Atherton Cemetery									
17	Silver Hill Cemetery									
18	Teeterville Cemetery									
19	Ukrainian Orthodox Cemetery									
20	Walsh Baptist Cemetery									
21	Walsh United Church Cemetery									

Legend

Recommended Cemetery Designation	Total Weighted Score
Active Cemetery	
Semi-Active Cemetery	
Inactive Cemetery	

2.4 ENGAGEMENT

County staff and external stakeholders were consulted to identify key issues, opportunities, and constraints related to Norfolk County Cemeteries. Staff engagement took place during the information-gathering stages of the Master Plan in January 2024 and was conducted by LEES+Associates. The County conducted stakeholder engagement in January 2024 that involved a group discussion with Bereavement Industry Practitioners. The information gathered from these groups is being used to inform public engagement, which will solicit public opinion on products and services, needs, and preferences through an upcoming “Engage Norfolk” online survey.

Key Findings

- Satisfaction with interment services and fee structure transparency.
- Support for bylaw consolidation.
- While long-term site staff have noted changes in cemetery operations over the years, documented complaints from residents are few. Likely, the operational changes in recent years were strongly influenced by need to expand cemetery operations to cover newly acquired cemeteries. As well, it is further recognized that the new cemeteries transferred to the County most often come with little/no C&MF.
- It is further recognized that municipal cemeteries are part of a broad organization which requires that senior leadership manage a broad range of programs and services; and that cemeteries make up a very small part of that.
- When analyzing resources, it should be intentionally recognized that ‘cemetery’ FTEs frequently perform roles and tasks beyond cemetery functions. Conversely, other resources, such as mowing contracts, financial services and grave-digging services should also be considered as contributors.
- A review of certain infrastructure at the cemeteries should be considered. This includes entrance signage and directional signage at larger sites.
- Cemetery acquisition must be systematized, with clarity around whether cemeteries are considered active or inactive.
- Record-keeping should be digitized and systematized. While this occurs for certain larger cemeteries, the addition of smaller rural sites to this system would bring long-term benefits
- The current cemetery fee payment processes (via Service Norfolk) are considered by some to be inconvenient to the point of being insensitive to grieving families. In reviewing service levels, the County may wish to consider alternatives such as the feasibility of cemetery administrative staff to accept fee payments.
- As evidenced by the first stakeholder engagement meeting in January 2024, there is a desire for regular communication between bereavement industry stakeholders, local cemetery boards, and County cemetery staff. With more recent changes including additional cemeteries, the contact list is out of date.

NORFOLK STAFF ENGAGEMENT FEEDBACK

On January 17th, 2024, Norfolk County Cemetery staff held a cemetery workshop, discussion, and site visits. The workshop was attended by senior staff members, cemetery labourers, cemetery administrators and a member of County Council. Feedback highlighted specific operational challenges and strategic considerations for management to consider. The focus was primarily on improving infrastructure, addressing maintenance issues, and refining record-keeping and interment practices. Staff provided detailed observations and recommendations for each cemetery to enhance overall efficiency and service quality. Key outcomes focused on two things: Fostering communication among/across the stakeholder group; and the desire for the County to continue to facilitate this type of positive engagement.

Key Findings

Operational and Maintenance Challenges

- General Operations: Cemetery staff are assigned duties outside the cemeteries and this sometimes leads to inconsistent cemetery maintenance.
- Oakwood Cemetery: There are issues with certain older roads, and available equipment storage space.

Infrastructure and Accessibility

- Office Environment: The cemetery office, located at the Facilities Operations Building/FOB, is in a portable/trailer unit. Staff manage this by setting appointments for visits by the public, informing them of stairway access and offering supports / alternatives (per AODA requirements). While directional signage has been improved, the location at an operations yard with obvious Trespass postings is sometimes confusing. Fortunately, the need for the public to attend the office is limited.
- Many cemeteries face infrastructure issues such as worn/damaged signs, encroaching vegetation in boundary areas that has occurred over time, and limited space for cemetery expansion.

Record Keeping and Strategic Planning

- While the County is utilizing cemetery database software, there is a need for further digital transition to optimize its capabilities and enhance efficiency and accuracy. This would help transition cemetery operations further from paper-based records.
- Norfolk needs a comprehensive strategy for managing future cemetery acquisitions; and the Plan's proposal for clear criteria for active vs. inactive cemeteries and improved record-keeping processes will help achieve this.

Examples of Specific Cemetery Issues

- Salem United Cemetery: Overgrowth, difficult digging conditions, and inaccurate grave locations.
- Courtland Baptist Cemetery: Issues with accessing burial equipment due to distance.

- Silver Hill Cemetery: There is an empty area at the front entrance, which could be an opportunity for infill, but the status of this area is unknown.
- Ukrainian Greek Orthodox Cemetery: Most burials are Ukrainian Orthodox services and these place strong focus/requirement for in-ground casket burials.
- Bayview Cemetery: Archaeology and monitoring.

BEREAVEMENT INDUSTRY PRACTITIONER ENGAGEMENT FEEDBACK

On January 31, 2024, a group discussion was held with representatives from Ferris Funeral Home, Murphy Funeral Home, Serenity Burial and Cremation Services, JM Memorials, and Kirkpatrick Monuments. Representatives from the Cultus and Clear Creek Cemetery Boards and members from Norfolk County Staff and Council were present.

Key Findings

Communication and Contact Information

- Stakeholders emphasized the need to update the contact list for cemetery sites, especially those run by Boards, to facilitate better communication.
- This discussion was the first instance of such communication, which stakeholders appreciated.

Payment and Office Processes

- The requirement for grieving families to pay via Service Norfolk received significant criticism for being inconvenient and insensitive to the needs of grieving families.
- There were suggestions to simplify the credit card payment process and to consider offering online payment options.
- The current cemetery office location can present accessibility challenges for some.

Cemetery Maintenance and Appearance

- General dissatisfaction with the appearance and maintenance of cemeteries, particularly Oakwood, was noted by this stakeholder group.
- Issues included overgrown trees, poor road conditions, and insufficient parking.
- Certain private cemeteries were perceived to be better maintained than the County's.

Service and Fee Structure

- Families were generally satisfied with the interment services and the equitable provision of necessary equipment by the County.
- While there were no complaints about the fees, there was interest in possibly simplifying the fee structure and reconsidering extra fees for weekends and holidays.
- Stakeholders supported the idea of a consolidated cemetery bylaw and appreciated the current transparent fee structure.

3 DEMAND AND NEEDS ANALYSIS

This chapter of the cemetery master plan examines key data in disposition and population trends to identify the future demand Norfolk County can expect at its cemeteries. It begins by reviewing historical sales and interment data, identifying the cemeteries' market capture rate, and outlining sales-to-interment ratios. The market area considered includes both Norfolk County and Haldimand County. The analysis of past trends provides the basis for future projections for interments and sales over the next 25 years. This chapter also analyzes the inventory available for purchase in the County's cemeteries and estimates the remaining capacity.

Note: The use of demographic data comes from Haldimand Norfolk Health and Social Services; and this data necessarily covers both Counties. This has been taken into account as it relates to the Plan's analysis.

Recommendations are provided based on the demand-needs analysis to indicate the additional cemetery capacity needed and the range of interment and memorialization options to develop over the next 25 years and beyond.

3.1 KEY FINDINGS

The following section summarizes the key findings from the demand-needs analysis. Unless specified, the findings represent data from the 21 cemeteries studied in this report.

HISTORICAL AND PROJECTED INTERMENTS AND SALES OF INVENTORY

Historical Interments

- From 2019 to 2023, an average of 29% of community members within the Market Area chose to be interred in a Norfolk County Cemetery, including **14%** choosing casket burial (below average) and **15%** choosing cremation (above average);
- From 2019 to 2023, the County's cemeteries provided:
 - 281 casket lot burials, averaging 56 per year;
 - 544 in-ground cremation burials, averaging 109 per year, and
 - 46 cremation niche inurnments, averaging 9 per year.

Projected Interments

- Over the next 25 years, the County's cemeteries are projected to provide:
 - 1,300 casket lot burials, averaging 50 per year, representing a slight decrease
 - 4,160 in-ground cremation burials, averaging 165 per year representing a notable increase; and
 - 325 niche inurnments, averaging 13 per year, representing a slight increase.

Historical Sales

- From 2019 to 2023, Norfolk County sold to community members:
 - 401 casket lots, averaging 80 per year; and
 - 85 cremation niches, averaging 17 per year.

Projected Sales

- Over the next 25 years, Norfolk County Cemeteries are projected to sell:
 - 1,900 casket lots, averaging 75 per year, representing a slow decrease;
 - 600 cremation niches, averaging 24 per year, representing a steady increase.

INTERMENT PRODUCTS AND LAND NEEDS

Oakwood Cemetery is the main provider of cemetery services in Norfolk County. Due to the centralized urban growth, it will likely continue to be a focal point for cemetery services. Though the Norfolk cemetery system has multiple locations, Oakwood Cemetery can be utilized to represent the state of the overall system. If the historical number of sales and interments continue, Oakwood Cemetery has the following estimated remaining Capacity:

- Single grave casket lots are expected to be sold out in **25 years**; but this may be as little as 15 years based on demand and site-specific conditions.
- Columbaria niches are expected to be sold out in **1 year**. A 100-unit columbarium is scheduled for installation in the summer/fall of 2024, which will accommodate an additional **4 years** of sales once operational; and the Capital Plan has further identified additional incremental columbaria installations which would cover as far out as 25 years' needs for this cemetery. The County may nonetheless wish to consider the installation of columbaria at other sites.
- Norfolk County needs to secure the ability to deliver casket and cremation interment sales for the long term (100-year horizon) and operate with 25 years of interment products that can be initialized for sales on-demand (reassessing needs as preferences and land requirements change). This will allow the County to serve the community and fund perpetual maintenance costs. At a high level, the County should plan for:
- 4,500 casket lots, approximately 9 acres, to address needs after the current inventory is sold out to accommodate the next 100 years;
 - 9 acres of land will accommodate approximately 18,000 in-ground cremation plots;
 - 2,280 niches to address needs for 95 years after the current inventory is sold out to accommodate the next 100 years;
- Noting that 2,280 cremated remains could be interred as in-ground cremation lots (915mm x 775mm; or 36"x30") within 1 acre (0.4 hectares / 208'x208') of land.

- Monitor the availability of neighbouring land, prioritizing large landholders over residential lots to expand Oakwood Cemetery. Keeping operations in one area lowers operational and administrative burdens and creates more opportunities for placemaking and dual purposes as park-like spaces.
- There are lands within the boundary of Oakwood Cemetery that are not yet surveyed for interment spaces. Once this is done it will extend the cemetery's longevity. As much of this land is significantly forested, prioritizing the use of these spaces for cemetery purposes is recommended as opposed to the costly acquisition of new land.

3.2 MARKET AREA PROFILE

This section of the cemetery master plan describes the Market Area primarily served by the County's cemeteries. The market area profile is based on detailed demographic data and vital statistics from Federal and Provincial government records.

The analysis in this section identifies the geographic boundaries, ethnic and religious affiliations, population size, number of deaths, and disposition statistics for residents in the Market Area. These variables will affect the future demand and need for the County's cemetery land and interment services. The trends in the variables evaluated through this analysis are the main drivers of demand. They will influence the need for additional cemetery capacity to maintain a diverse range of interment and memorialization options over the next 25 years and beyond.

GEOGRAPHIC AREA SERVED

The County's cemeteries primarily serve Norfolk County residents, and where possible, this master plan looks at data specific to the county. However, information on deaths in this area is collected at the Health Unit level. Due to this and the close links between the two counties, this analysis uses the Haldimand-Norfolk Health Unit's geographic boundaries as the boundaries of the Market Area to determine trends in deaths.



Figure 2: Market Area for Norfolk County (Haldimand-Norfolk Health Unit boundary).

RELIGIOUS AND ETHNIC PROFILE

Individual preferences determine a person's disposition and interment choices. Personal values, family traditions and financial considerations shape these preferences. Religious affiliations and ethnic groups have traditional and cultural practices that can significantly influence individuals' interment preferences.

Understanding the religious profile of the County is important in helping to understand the local demand for different types of interment and memorialization options. Some religions require specific forms of disposition and interment.

Appendix C, Religious and Ethnic Preferences, provides additional information about the disposition and interment preferences of the County's community members.

Religious Profile

The following figure illustrates the current religious distribution of residents in Norfolk County¹.

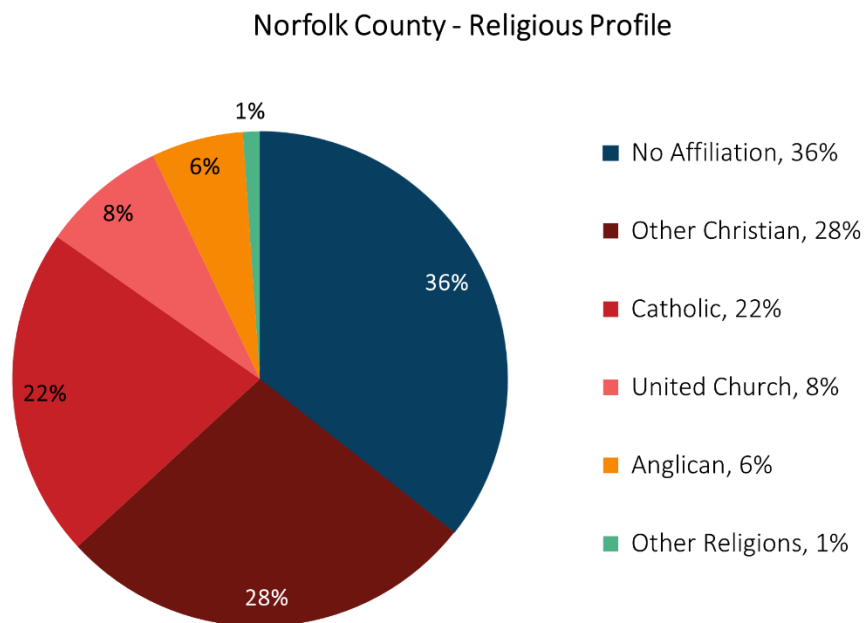


Figure 3: Norfolk County Religious Profile. Source: Statistics Canada, National Census 2021.

The County can expect that the interment needs of most families are likely influenced by the tenets and practices of Christianity, particularly those of the Catholic Church².

Establishing a dialogue with community leaders from these faith groups will be necessary to ensure that the County is informed about their cemetery services needs.

1 Norfolk County Resident Religious Distribution, Source: Statistics Canada, National Census 2021.

2 CBC. "Vatican Issues New Rules on Catholic Cremation," October 25, 2016.

<http://www.cbc.ca/news/world/vatican-catholic-cremation-1.3820336>.

Ethnic Profile

The following figure illustrates the current ethnic distribution of residents in Norfolk County¹.

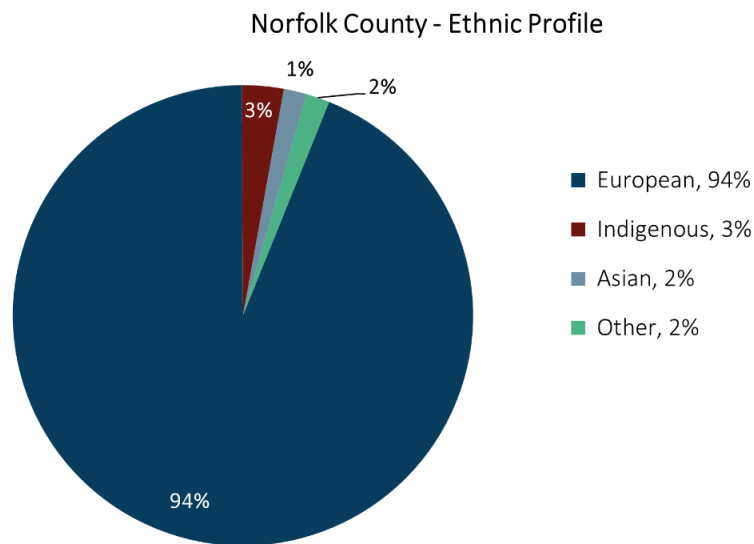


Figure 4: Norfolk County Ethnic Profile. Source: Statistics Canada, National Census 2021.

Norfolk County's ethnic profile reveals that 97% of its population is of European descent, roughly the same as in 2016. Despite the similar demographic composition, the population of Norfolk County has increased, as have populations of non-European descent.

Between 2016 and 2021, there have been increases in residents of:

- South Asian heritage (345 in 2021, up from 115 in 2001);
- Filipino heritage (260 in 2021, up from 135 in 2001);
- Latin American heritage (245 in 2021, up from 95 in 2001); and
- African heritage (650 in 2021, up from 575 in 2001).

While not all residents of non-European heritage have significantly different interment and memorialization practices than what is currently offered at the County's cemeteries, some of these community members may desire new religious and ethnic sections and custom interment and memorialization services at the cemetery.

Furthermore, areas near Norfolk County—such as Hamilton, Brantford, and Caledonia—see marked population diversification, with Muslim, Hindu, and Sikh communities showing significant growth. It's difficult to predict whether this trend will extend to Norfolk County. Still, the cemetery system must be adaptable and ready to respond to the needs of new ethnic and religious communities. A section oriented toward Muslim burial would pre-empt potential future needs and could, in the interim, create a market for clients (and premium revenue) from outside Norfolk County.

HISTORICAL AND PROJECTED POPULATION GROWTH

The following table summarizes the Market Area's historical and projected population numbers and its rate of annual average growth.

Market Area Served	Population 2019	Population 2023	Average Growth 2019-2023	Population 2048	Average Growth 2024-2048
Haldimand-Norfolk Health Unit	118,939	126,057	1.59%	157,556	0.9%

Table 1: Historical and Projected Population Growth, Watson & Associates - Population Projections for Norfolk County, Public Health Ontario and the 2021 Census of Population, Statistics Canada.

HISTORICAL AND PROJECTED DEATH RATES

The following table summarizes the Market Area's historical and projected deaths and death rates.

Market Area Served	Average Annual Deaths, 2019-23	Deaths per 1,000, 2019-2023	Average Annual Deaths, 2024-48	Average Deaths per 1000, 2024-2048
Haldimand-Norfolk Health Unit	1,153	9.8	1,489	10.4

Table 2: Historical and Projected Resident Deaths and Death Rates,
Source: Provincial Data – Public Health Ontario and 2021 Census of Population, Statistics Canada.

Statistics Canada predicts the increasing aging population in the Market Area will increase the need for cemetery and funeral-related goods and services. This is projected to start in 2026 when the oldest members of the Baby Boom generation reach 80. The number of deaths is expected to increase until 2045, when the youngest members of the Baby Boom cohort turn 80.

The local death rate is expected to grow from the current 9.8 deaths per 1,000 residents to 11 deaths per 1,000 residents by 2048, with an average of 10.4 deaths per 1,000 over the next 25 years.

Anticipated changes in the Market Area over the next 25 years

The Haldimand-Norfolk Health Unit population is projected to **increase by 31,449 (25%)** from 126,057 in 2023 to 157,556 by 2048.

Norfolk County's population is projected to **increase by 19,349 (28%)** from 69,451 in 2023 to 88,800 by 2048.

The annual death rate in the Market Area is projected to **increase by 500**, from 1,235 per year in 2023 to 1,735 per year by 2048.

The total number of deaths in the Market Area is projected to be 37,231 over the next 25 years, **averaging 1,489 per year**.

Disposition Trends

Disposition describes how human remains are handled after death. The most common forms of disposition in North America are in-ground **casket burial** and **cremation**.

National & Provincial Cremation Rate

Cremation is increasingly becoming the preferred form of disposition for most Canadians. What individuals and families then choose to do with cremated remains varies greatly.

Cremated remains are usually contained in an urn for future interment in an in-ground lot, placed within an above-ground columbaria niche, scattered at a cemetery, or more often at a place of personal meaning, such as a park or lake.

The following map illustrates the preference for cremation in the Canadian provinces and territories in 2022.

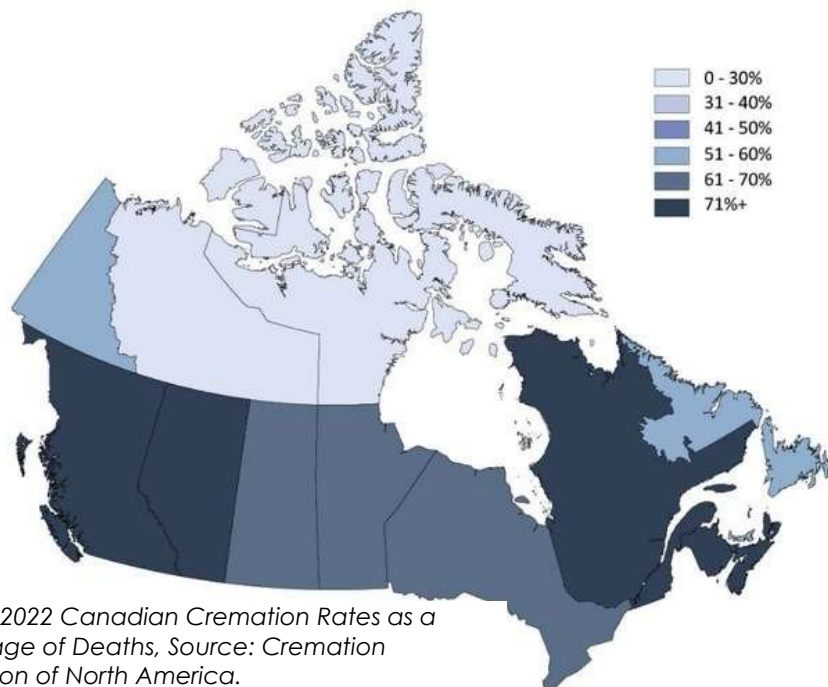


Figure 5: 2022 Canadian Cremation Rates as a Percentage of Deaths, Source: Cremation Association of North America.

The National average cremation rate increased from 63.9% in 2013 to **75.3%** in 2022. The Ontario average cremation rate increased from 54.6% in 2013 to **67.3%** in 2022. Cremation rates for Norfolk County were not available from the Province. Therefore, the County's cremation rate is assumed to be similar to the provincial rate for this analysis.

The cremation rate is expected to continue rising in all provinces nationwide. It is expected to increase by an average of 0.83% annually until it reaches 83% in 25 years.

While cremation is an increasingly popular choice of final disposition, it is expected there will always be some families that will need in-ground casket burial due to religious traditions influencing the final choice of interment.

MARKET AREA HISTORICAL POPULATION AND DEATHS

The following graph shows the population growth, death, cremation, and casket burial trends for the Market Area from 2019 to 2023. The population data align with the left vertical axis, and the death, cremation, and casket burial data align with the right vertical axis.

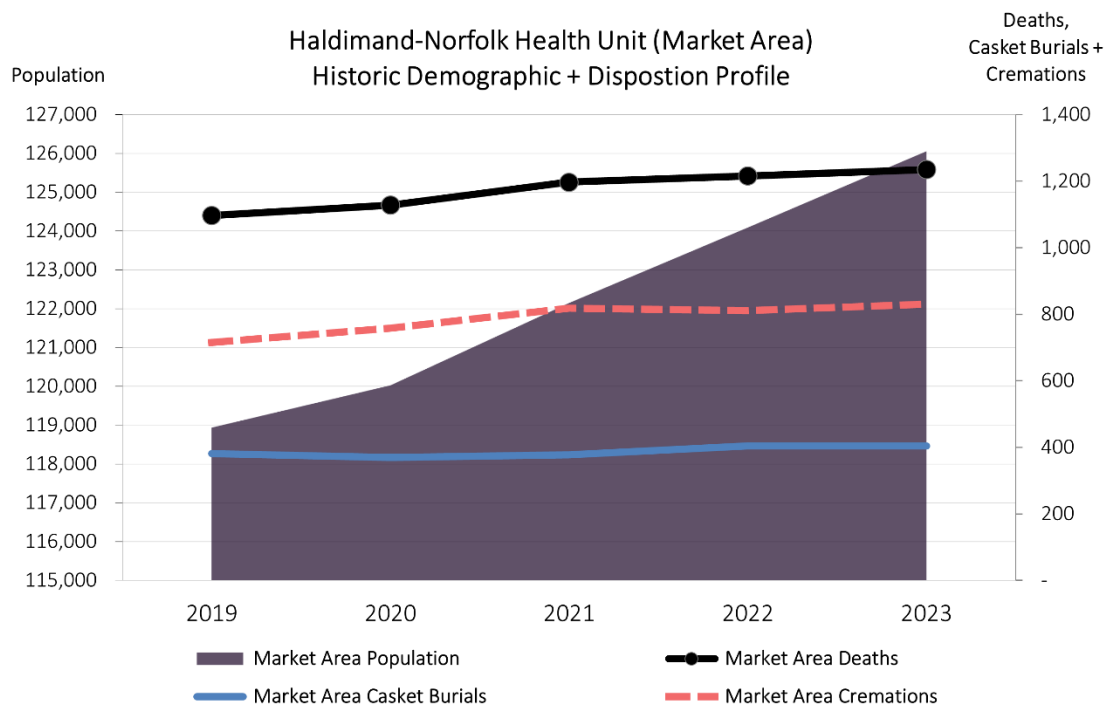


Figure 6: Norfolk County Market Profile, Demographic + Disposition Variables. Source: LEES+Associates.

To summarize the graph above, over the past five years:

- The population has increased, though deaths have only increased moderately so far;
- The number of cremations has remained almost constant, and
- The number of burials has remained almost constant.

PROJECTED MARKET AREA SUMMARY

The following graph shows the trends that will define the Market Area served by the Haldimand and Norfolk County cemeteries over the next 25 years. The population data align with the left vertical axis, and death, cremation, and casket burial data align with the right vertical axis.

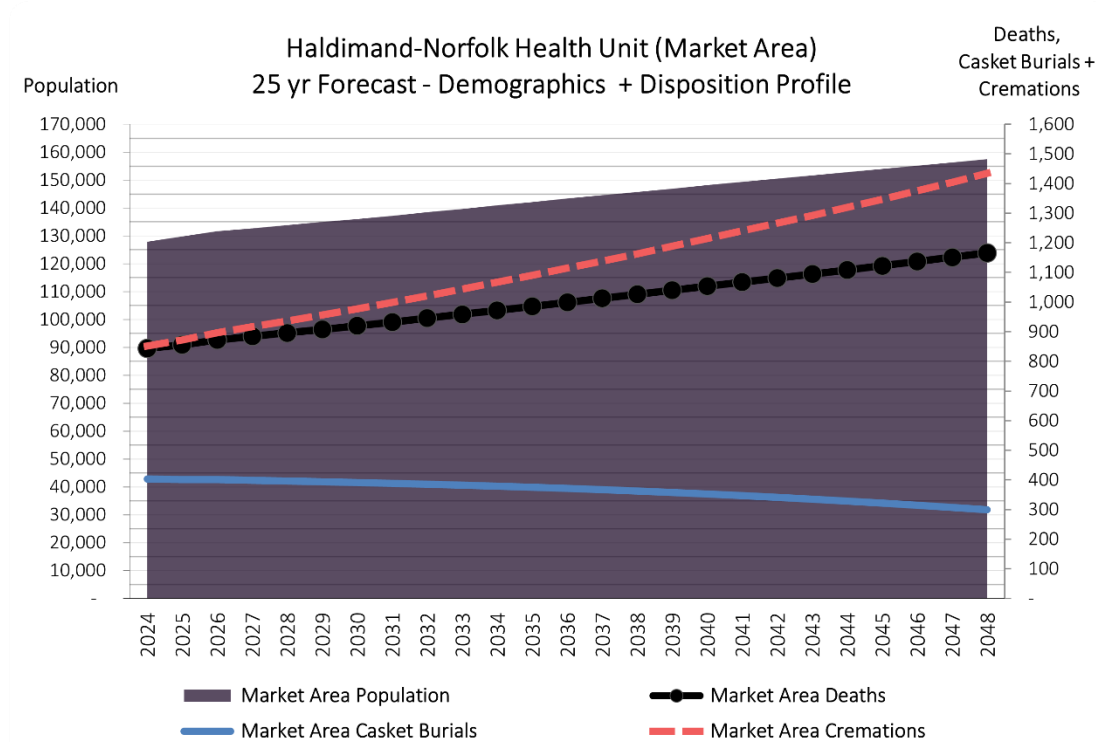


Figure 7: Norfolk County Projected Cemeteries Market Summary, Source: LEES+Associates.

This graph provides a summary of the **total demand** in the Market Area. Due to the projected population increase and the increasing death rate, this region-wide demand for cemetery services and cemetery land is expected to increase steadily.

Over the next 25 years in Norfolk County, it is expected there will be:

- 9,100 casket burials, averaging 365 per year, and
- 28,100 cremations, averaging 1,125 per year.

3.3 HISTORICAL & PROJECTED INTERMENTS AND SALES

This report section provides a historical interment and sales summary for Norfolk County Cemeteries.

This includes an overview of the cemeteries' activity measures and projections for the amount of each type of inventory that will be sold, as well as the number of casket burials, cremation burials and cremation niche inurnments expected to take place Norfolk County cemeteries over the next 25 years. These projections assume that historical disposition and service trends, market capture rates, and sales-to-interment relationships from the past five years will continue over the next 25 years.

HISTORICAL INTERMENTS AND SALES

This section reviews the historical demand for Norfolk County's interment services and inventory sales.

The following graph summarizes the County's historical disposition and cemetery demand from 2019 to 2023. In this graph, the Market Area cremation and casket burial data align with the left vertical axis, displayed in stacked blocks. The cemeteries' interments and sales data align with the same axis using lines.

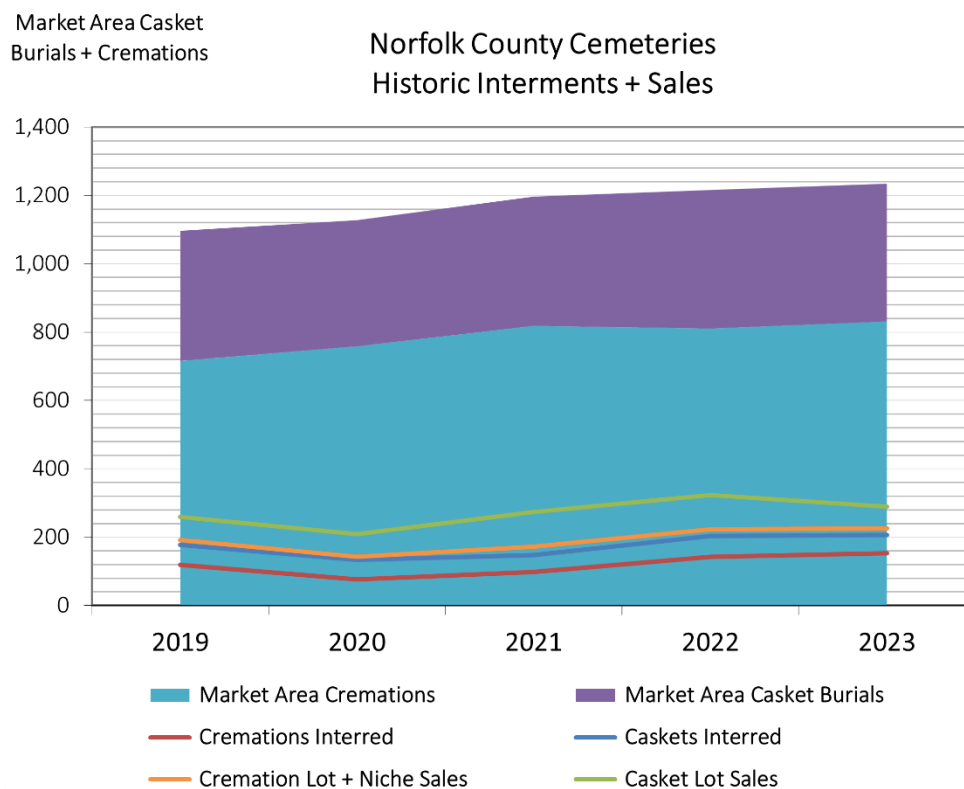


Figure 8: Historical Sales and Interments at Norfolk County Cemeteries.
Source: Norfolk County Cemeteries' Records.

While the number of interments has increased throughout the market area, increases in sales and interments within Norfolk County cemeteries have been inconsistent. Interments and sales numbers in Norfolk County had an uncharacteristic spike in 2021 and 2022.

Since then, casket sales have returned to numbers more in line with 2019 and 2020 and steadily declined. Cremation sales, on the other hand, decreased slightly after a spike in 2021 but are still higher than in previous years. This trend aligns with an increased preference for cremation regionally and nationally.

CEMETERY MARKET CAPTURE RATE – KEY PERFORMANCE INDICATOR

Market capture is the proportion of the casket burials and cremation dispositions in a market area interred by a cemetery over a defined period. Several factors, including the following, may influence the proportion of residents who choose to be buried at Norfolk County Cemeteries:

- Attractiveness of the cemetery site;
- Diversity of the product and service options;
- Frequency of the cemetery operator’s community engagement;
- The cemetery’s proximity to residential areas and residents;
- The cemetery’s level of universal accessibility;³
- The cemetery’s ability to meet religious/ethnic burial practices and traditions and
- Pricing.

Market research by LEES+Associates over the past two decades finds that most Canadian municipal cemeteries serve a market area consisting of one community and its surrounding rural area. These cemeteries typically serve 80%- 90% of those choosing casket burial and 10%- 20% of those choosing cremation in their community.

These service rates decline in large urban centres with multiple service providers within their market area. A cemetery in this market typically provides services for 15%- 35% of those choosing casket burial and 1%- 10% of those choosing cremation in their community.

The following table shows the methodology for determining the market capture rate. It includes the number of interments at the County’s cemeteries and compares them to the total casket burials and cremations in the Market Area from 2019 to 2023.

³ In this section, “universal accessibility” refers to the overall visibility of the cemetery’s profile to the market area’s residents, how easy it is for them to locate the site, as well as navigate within it.

Interments + Dispositions	Total from 2018-2022	Average per Year
Total Cemeteries Casket Interments (A)	281 casket interments	56 casket interments
<i>Oakwood Casket Interments</i>	<i>202 casket interments</i>	<i>40 casket interments</i>
County-wide Casket Burial Dispositions (B)	1,939 casket burials	388 casket burials
Casket Burial Market Capture¹ (A/B)	14%	14%
Total Cemeteries Cremation Burials	544 cremation lot burials	109 cremation lot burials
<i>Oakwood Cremation Burials</i>	<i>417 cremation burials</i>	<i>83 cremation burials</i>
Total Cremation Niche Interments	46 cremation niche interments	9 cremation niche inters
<i>Oakwood Cremation Interments</i>	<i>46 cremation niche interments</i>	<i>9 cremation niche inters</i>
Total County Cremation Interments (C)	590 cremation interments	118 cremation interments
Market Area Cremation Dispositions (D)	3,934 cremations	765 cremations
Cremation Market Capture (C/D)	15%	15%

Table 3: Norfolk County Cemeteries' Interments to Dispositions Market Capture Rate from 2019 to 2023. Source: LEES+Associates and Norfolk County Cemeteries' records.

The County's market capture rate is **14%** of casket burials and **15%** of cremations from the Market Area it serves.

This casket market capture rate is below average for what LEES+Associates would expect from an average Canadian municipal cemetery. It is within the range of what LEES+Associates would expect from cemeteries in a large, densely populated Canadian municipality. Large urban centres usually have more cemeteries competing to serve their community members. However, due to the large geographic area the County covers, there is a high level of competition from privately operated cemeteries despite the rural nature of the market area.

Norfolk County Cemetery's cremation market capture rate is above average compared to what LEES+Associates would expect from an average Canadian municipal cemetery that primarily serves one community and its surrounding rural area.

The market area being examined includes Haldimand County. The market capture would likely nearly double if the area were adjusted to include only Norfolk County. Unfortunately, data for Norfolk County alone is not available. However, this higher rate would be because the county has recently taken over many previously privately or locally managed cemeteries, becoming its residents' primary cemetery service provider.

A market rate above 20% is exceptional, given that most cremated remains in North America are not interred in cemeteries. An attractive range of cremation interment options can help increase this market capture rate.

Overall, Norfolk County's market capture rate does not indicate the need to become more competitive but rather to tailor its products to its residents better.

Interment to Sales Ratio

The number of annual sales is also an important measure of demand, as it can be used to estimate the number of years of capacity remaining before more cemetery land is needed.

Analysis of the County's interment and sales data found that from the County's cemeteries:

- Interred 1 casket for every 1.5 casket lots that they sold and
- Sold 2 columbaria niches for every niche inurnment.

These interment and sales patterns suggest that there has been strong community demand for the pre-purchasing of casket lots. They also show that columbaria inurnment is a popular option. Extrapolating from missing data, as most cremated remains are interred in casket lots, there is a possible desire for more cremation products.

Norfolk County currently allows up to six cremation interments within each casket lot, which inflates its interment capacity without addressing demand, as total usage of six interments within any casket lot is unlikely.

PROJECTED INTERMENTS + SALES

This section of the report provides projections for the number of each type of inventory to be sold and the number of casket burials, cremation burials, and cremation niche inurnments expected to occur within Norfolk County's cemeteries over the next 25 years.

These projections assume that historical disposition and service trends, market capture rates, and sales-to-interment relationships will remain the same over this period.

The following graph summarizes the inventory sales, in-ground lot burials, crypt, and niche interments expected at Norfolk County Cemeteries over the next 25 years. The Market Area cremation and casket burial data align with the left vertical axis, and the cemeteries' interments and sales data align with the right vertical axis.

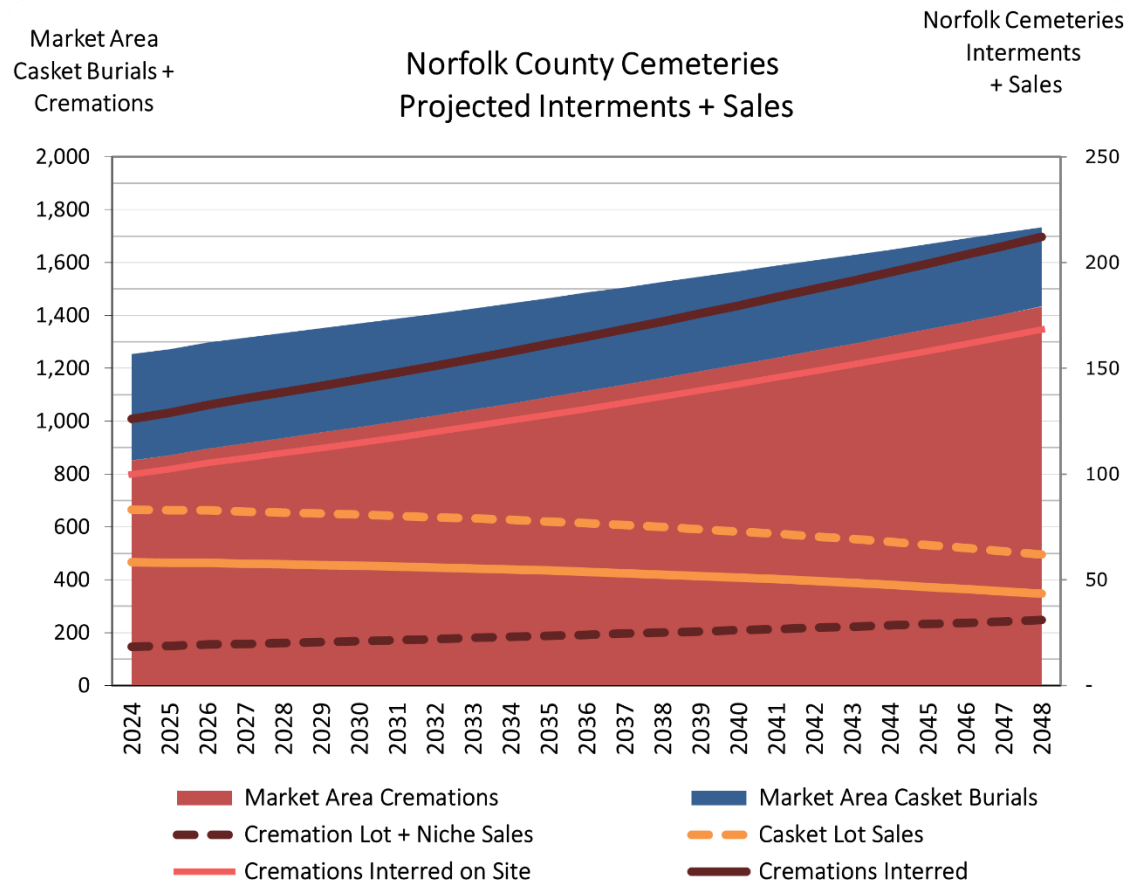


Table 4: 25-Year Projection of Norfolk County Cemeteries' Interments and Sales, Source: LEES+Associates.

Over the next 25 years, the County cemeteries are projected to undertake:

- 1,300 casket lot burials, averaging 50 per year;
- 4,160 cremated remains interments, averaging 165 per year; and
- 325 columbaria niche inurnments.

Over the next 25 years, Norfolk County Cemeteries are projected to sell the right-of-interment for:

- 1,900 casket lots, averaging 75 per year; and
- 606 columbaria niches.

Without dedicated cremation in-ground interment products at Oakwood or records of such at rural cemeteries, the demand for individual products cannot be determined. However, the demand for interments forecasted above shows a need for cremated remains interment options at Norfolk County cemeteries that will eclipse demand for casket lots.

3.4 CEMETERY CAPACITY ANALYSIS

This section of the report examines the inventory of casket lots, cremation lots, and niches at Norfolk County Cemeteries. It compares the current inventory with the projected demand for inventory over the next 25 years.

CEMETERY INVENTORY AVAILABLE FOR SALE

The following graph summarizes the County's inventory available for sale by the type of interment.

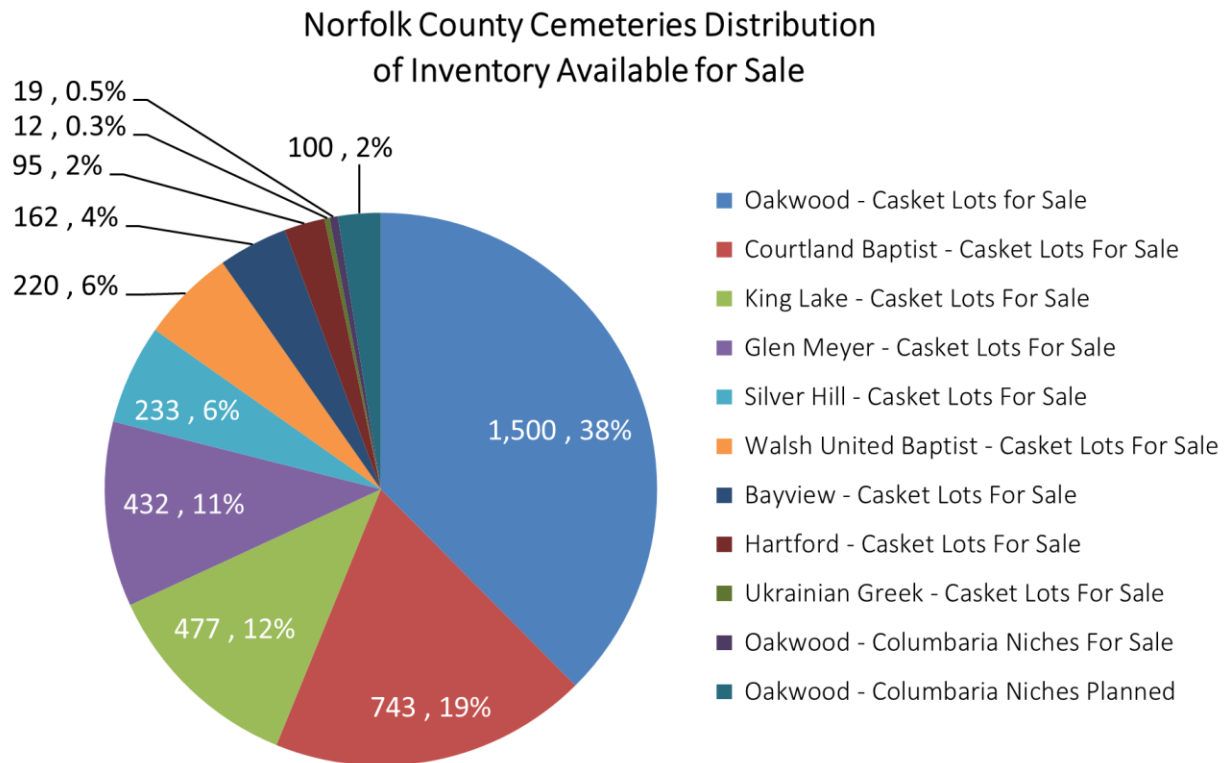


Figure 9: Inventory Available for Sale. Source: Norfolk County Cemeteries' Records.

The table below summarizes Norfolk County's cemeteries inventory available for sale, the projected average number of sales per year over the next 25 years, and the estimated number of years of sales.

Inventory Type	Available for Sale	Average Sales per Year (2024-2048)	Years of Sales Remaining	Sold Out Date	Additional Inventory Required to Meet 25 Yrs. of Demand
OAKWOOD					
Casket Lots	1,500	58	24-27	2048-2052	120 for contingency
Columbaria Niches	19	24	< 1	2024	Additional planned
Columbaria Niches (in progress)	100	24	3-5 (in progress)	2027-2029 ⁴	480-520 niches
BAYVIEW					
Casket Lots	162	9	16-18	2039-2041	70-74
WALSH UNITED					
Casket Lots	220	2	~150	~2174	Exceeds demand

Table 5: Inventory Summary, Source: LEES+Associates.

The sales data is an estimate based on cemetery records, open land, and known field conditions. The suitability of land and quality of records is currently under review by staff. Availability and projection shown should be used to inform high level decision making and to gauge timing for planning. Further investigation is required to confirm suitability and feasibility of land for the needs of each interment product.

Bayview is an example of a cemetery with considerable land available for interment, however, due to the high occurrence of Indigenous artifacts, the cost to open and close each grave has been impacted by significant archaeological costs; which has far exceeded the fees collected from sales. Though this site projects sales inventory, the use of the land may not be feasible from a business perspective. There may be options to utilize problematic lands for other revenue-generating sales such as cremation remains scattering, garden crypts (without footings), family columbaria (without footings) memorial tree planting, memorial benches, etc. Problematic grounds can also be used as opportunities for places of connection and/or decompression spaces such as trails, open lawns, wind phones, seating areas, event programming, etc. It is important to properly identify and articulate the viable use of available land to ensure projections and needs are more accurately documented.

Oakwood has 3,000 casket lots available for sale shown within the Stone Orchard software, however only 1,500 are believed to be viable for sale. These irregularities are data gaps which occurred during software implementation and require further review and development.

A revision of unutilized cremation lots at Oakwood could affect the number of new casket lots needed and make more efficient use of the land available for interment. In turn, this could establish a workflow that could be applied to other locations within the County.

3.5 INVENTORY AND LAND NEEDS

Norfolk County needs to secure the ability to deliver casket and cremation interment sales for the long term (100-year horizon), operating consistently with 25 years of interment products that can be initialized for sales on demand. The products offered should be periodically assessed as preferences change, which will affect land requirements. This will allow the County to best serve its community and maximize revenue to fund perpetual maintenance costs.

At a high level, the County should plan for:

- 4,500 casket lots, approximately 9 acres, to address needs for 75 years after the current inventory is sold out, to accommodate the next 100 years;
 - 9 acres of land will accommodate approximately 18,000 in-ground cremation plots;
- 2,280 niches to address needs for 95 years after the current inventory is sold out, to accommodate the next 100 years;
 - 2,280 cremated remains could be interred as in-ground cremation lots with one acre of land; and

Oakwood Cemetery itself can likely cover much of the County's needs for the next 100 years, according to current population forecasts, with close to nine acres of developable land within its current boundaries. The Pine Woodland and Overlook section alone is 6.3 acres. But this land might not be suitable for all interment products, such as casket lots.

This land must be kept for cemetery use. It should be investigated for suitability and developed strategically for different interment options/types.

The acquisition of additional properties for cemetery use in the near future is vital to ensuring the County has cemetery capacity for all interment products in the long term, as less land remains available over time.

Muslim populations require in-ground full-body burial with special lot orientations, towards Mecca. Green burial is gaining popularity across Canada and internationally and works best in naturalized spaces.

In addition to development within Oakwood Cemetery's existing boundaries, the County must monitor the availability of neighbouring land and acquire it for future cemetery expansion, prioritizing large landholders over residential lots to expand Oakwood Cemetery. Keeping operations in one area lowers operational and administrative burdens and creates more opportunities for placemaking and dual purposes as park-like spaces. In Chapter 6, properties at Oakwood Cemetery are identified for investigation and monitoring. Please note that these properties are identified only to suggest the types of spaces that could be utilized and are not intended to highlight any specific property.

4 PRODUCTS, SERVICES, AND FEES REVIEW

Building on last chapter's analysis, this chapter identifies opportunities for new services and increased revenue at Norfolk County's cemeteries. It compares the County's offerings to those at municipal cemeteries across Canada and similar cemeteries in jurisdictions near Norfolk County. The primary focus is on offerings at Oakwood Cemetery, Norfolk's most active cemetery, which offers the broadest array of products and services. Still, the analysis is applicable across the cemetery system.

The communities used for comparison include Tillsonburg, Haldimand County, Elgin County, Perth County, and Brantford. These communities have been selected for comparative benchmarking because they serve community members with a demographic and disposition profile similar to those in Norfolk County's Market Area.

They also operate in climate and weather conditions similar to those of Norfolk County, which likely results in a comparable cost for their service delivery. Municipal cemeteries typically strive to price their offerings to remain competitive with the alternative cemetery service providers that are likely to serve their Market Area's residents.

4.1 KEY FINDINGS

The following section is a summary of the key findings from this plan's products, services, and fees review:

- Norfolk County currently has a high demand for cremation interments but a low variety of cremation interment options. Most cremated remains are presently interred in casket lots. Oakwood Cemetery's bylaw allows for cremation lots; implementing these smaller lots would serve residents' needs and make better use of available land. Other options could include family columbaria, family cremation estates, and family vessels.
- Norfolk County's right-of-interment fees and fees for additional services are generally lower than the regional averages. Given the resources needed to manage a growing portfolio of cemeteries, a one-time increase to these fees would be justifiable and warranted.
- There is an opportunity to expand interment options to serve a growing population and react to national interment trends, such as green burial.

4.2 CURRENT INTERMENT OPTIONS

IN-GROUND OFFERINGS

Norfolk County currently offers:

Casket Lots — These lots are permitted to accommodate a maximum of one casket and up to six (at Oakwood) cremated remains without a casket. Oakwood also offers a preferred lot option that allows for decorative planting.



Figure 10: Casket lots with upright monuments at Oakwood Cemetery. Source: LEES + Associates.

Cremation Lots — These smaller lots can accommodate up to four cremated remains. While permitted by Oakwood Cemetery's bylaw, revising an un-utilized cremation lot section may help make this product be more marketable.



Figure 11: Example of cremation lots with flat and upright markers. Source: LEES+Associates.

Family Estate Lots — Until recently, at Oakwood Cemetery, plots of two, four, or six lots could be bought together to form what is, in effect, a family estate. These plots have either a single marker or one for each lot, though regular interment limits apply. This is no longer available as an option for purchase.



Figure 12: Example of family estate plots. Source: LEES+Associates

Infant Lots – Norfolk County offers discounted pricing for infant lots and interments. Infant lots are not permitted to host cremated remains in addition to caskets.



Figure 13: Seating in a child burial section. Source: LEES+Associates

In Norfolk County, from 2019 to 2023:

- 32% of services were casket interments;
- 83% of sales were for casket lots, though as noted below, this encompasses the primary interment option for cremated remains as well;
- 68% of services were cremation lot interments, and
- 17% of sales were for columbaria niches, though most cremated remains are interred in casket lots.

In addition to the options listed above, Norfolk County offers discounted pricing for veterans' rights of interment: \$335 for veterans, resident or non-resident, compared to an average of \$895 for residents of Norfolk County for adult casket plots.

Many Canadian cemeteries have special sections for different ethnic or religious groups, such as a Chinese or Muslim Section. However, Norfolk County cemeteries do not need to develop further separate sections unless community members express a strong interest.

OTHER OFFERINGS

Community Columbaria

Norfolk County's Oakwood Cemetery offers the inurnment of cremated remains in columbaria niches. This is the only dedicated cremation interment option at the cemetery currently. Each columbaria niche allows up to two inurnments.

At Oakwood, from 2019 to 2023:

- 5% of services were columbaria niche interments, and
- 17% of sales were for columbaria niches.

Memorialization Options

In addition to the interment products it provides, Norfolk County offers the following common memorialization options:

- Columbaria plaques; and
- Memorial Wall Plaques.

These memorialization options are customary at cemeteries across Canada and should be continued.

Additional Service Options

In addition to the interment services it provides, Norfolk County offers the following common supplemental support services:

- Locate and inspection fee;
- Devices and greens (service provided but no fee currently charged);
 - To recoup costs taken on through equipment and labour, Norfolk County might consider charging a fee for this service. To keep affordable for residents, the recommended fee should be 20% to 50% less than current private market rates for similar services. However, this should be considered in light of any potential impact on local Funeral home revenues.
- Saturday/Sunday services;

Memorial benches or other memorialization options:

- Duplicate interment rights certificate;
- Disinterment and reinterment services;
- License transfer services;
- Sodding services;
- Tent services.

Additional services (and associated fees) are customary at cemeteries across Canada and should be continued.

4.3 NEW PRODUCT & SERVICE OPTIONS

Norfolk County offers more interment options and cemetery services than municipal cemeteries serving similar communities. Introducing new options enhances the diversity of offerings and attracts families that may otherwise choose another cemetery or choose not to inter in a cemetery.

Maintaining relevancy in cemeteries is one of the industry's biggest challenges outside of land capacity constraints. Despite the increased number of people choosing cremation, with disposition rates of 80-90% on average, cemeteries still only see 5-10% of those dispositions as

customers. Families are seeking meaningful ways to inter the remains of their loved ones. Norfolk County Cemeteries must adapt product and service offerings to capture that market's interest.

The following are new products and services identified for future implementation consideration:

- **Green burial** is increasing in popularity, appeals to younger demographics, and is an alternative pulling from the cremation market. As the landscape developed around green burial plots is typically a naturalized and low-maintenance setting, designating land for this interment type can offer long-term maintenance savings. Green burial has many marketing benefits for the County and the Cemetery, promoting wildlife habitat benefits and reducing the carbon footprint on County lands. Green burial is a premium product;
- **Scattering gardens** are a way to offer lower-cost options to families with the potential for a high level of meaningful engagement. Scattering gardens allow for multiple interments in a compact area, offer opportunities for meaningfully themed memorialization, and provide opportunities for placemaking beautiful destinations for families to gather and remember their loved ones;
- **Family columbaria** are the same as community columbaria, except that they are scaled for a single family with the exclusive right-of-interment to all the niches or other features. Family columbaria are space efficient and can be placed in a versatile range of locations, including in areas that do not lend themselves to in-ground burial;
- **Cremation-only family estate plot** is a small area of cemetery land comprised of multiple lots dedicated to one family. They often consist of a large headstone or memorial dedicated to the family and smaller individual headstones for each family member interred in the plot;
- **Family estates** for casket burials could be placed in premium locations, offer additional decorative features, and be priced accordingly. Casket burials remain popular in the county, and through creative landscape design, family estates can help raise a cemetery's aesthetic impact.

More **memorialization** options would allow the County to market offerings to families interred in the cemetery and those interred elsewhere. Memorial benches and trees, for instance, provide a source of revenue, an option for memorialization without interment, and an enhancement to the site. Memorial benches are currently offered by Norfolk County, but the service should be modified to better suit the cemetery environment. .

- There is an opportunity for the County to add several new support service options to better meet the custom needs of its community members and increase its cemetery revenue. New service fees could include tent and chair rental, pallbearer and other custom graveside services.

Appendix A — Product and Services Options outlines examples and detailed information about each of the above products and services that Norfolk County should consider adding to its cemeteries.

4.4 PRICE BENCHMARKING STUDY

This section analyzes the prices of the County's primary products and services and compares them to benchmark communities and national averages. It also provides context for cemetery pricing trends and recommends changes in pricing.

MARKET TRENDS

Cemetery pricing in Canadian cemeteries tends to follow consistent market trends.

Most municipal cemeteries operate on a "cost leadership" business model, where they compete on affordability. Private and some religious cemeteries operate on a "differentiation" model, offering a diverse range of customized and premium services.

Large urban centres often have higher rates than small towns and rural communities due to the increased demand relative to local supply. Cemeteries in large urban centres also tend to provide a greater diversity of offerings than small towns and rural communities.

Families value a variety of interment options and are willing to pay a premium to accommodate their cultural, religious, and personal preferences.

Cemeteries with many interment and memorialization options are often perceived as more attractive and offer better value. This enables them to charge higher rates than other cemetery operators can justify.

The following figure shows the pricing continuum for typical Canadian cemetery offerings:



Figure 14: Pricing Continuum for Typical Canadian Cemetery Offerings. Source: LEES+Associates.

PRICE BENCHMARKING

Best practices for cemetery pricing entail an annual comparison of cemeteries' rates in communities with similar landscapes and demographic profiles. This involves reviewing the rates of other cemeteries with similar business models, climate conditions, and population, ethnic, and religious composition.

This price benchmarking study reviewed the County's rates relative to the averages at similar cemeteries in southwestern Ontario. Among the communities reviewed, Perth County's cemetery in North Perth had the highest fees for purchasing a right-of-interment for its casket lots (without a premium option), niches, and cremation lots. Brantford had the highest overall fee for right-of-interment casket lots with its premium option.

The following table compares and summarizes the resident rates for the most common primary offerings available at the cemeteries in this study, including the Care and Maintenance fund fee portion.

Cemetery Offering	County Rate	Regional Rates ⁴	Regional Max ⁵	Canadian Rate	Price Comparison: The County's Relative Position
Casket and Cremation Lots / Niches / Scattering Area					
Adult Casket Burial Lot	\$895 to \$1,185	\$1,078 to \$1,426	\$2,029	\$1,000 to \$3,000	Regional: Below Par ⁶ Canadian Average: Below Par
Cremation Burial Lot	\$476	\$756 to \$814	\$1,011	\$500 to \$1,500	Regional: Below Par Canadian Average: On Par
Columbaria Niche	\$2,384	\$2,023 to \$2,291	\$3,230	\$1,000 to \$5,000	Regional: Above-Par Canadian Average: On Par
Opening + Closing Services					
Adult Casket Burial	\$928	\$985	\$1,210	\$750 to \$2,000	Regional: Below Par Canadian: On Par
Cremation Burial	\$425	\$392	\$480	\$250 to \$750	Regional: Above-Par Canadian: On Par
Niche Inurnment	\$252	\$256	\$328	\$100 to \$500	Regional: On Par Canadian: On Par

Table 6: Price Benchmarking Summary of Key Offerings. Source: LEES+Associates

The County's cemetery prices are generally lower than the regional average rates for the services and offerings it provides to its community members. The County can raise its fees in the upcoming year without surpassing the region's fair market value for cemetery services. The County has a valid reason for increasing its rates beyond the inflation rate, as it is necessary to establish more equitable pricing with neighboring cemeteries and communities.

Appendix B — Detailed Price Benchmarking Study contains the detailed results of the price benchmarking study for Norfolk County Cemeteries.

⁴ The minimum and maximum averages of cemetery rates among the benchmark communities.

⁵ The regional max rate is the maximum is the highest rate charged by benchmark communities for the offering.

⁶ Par = The average rate in this price benchmarking study.

PRICE CHANGES + STRATEGIC POSITIONING

The County raises its fees yearly, often using inflationary rates at a guideline. With some exceptions, Norfolk County Cemeteries are scheduled to increase their rates by an average of 3% annually. Historically, municipalities have typically used 2% as a minimum base rate for long-term price growth to offset the impact of inflation and then added 1% to improve the cost recovery of its operations over time. Norfolk County's current schedule of fees aligns with this best practice.

Price changes usually have little impact on the demand and need for a cemetery's services. This means the County can continue to increase its rates, with little risk of losing revenue to residents choosing to be interred elsewhere, provided rates continue to be increased within the expected regional price range.

It is best practice to ensure that while Norfolk County is increasing its prices, it also ensures that its rates remain at par with the fair market value for cemetery services in Ontario and below the highest rates charged by other cemeteries in the region. Given that the County's fees are largely below average compared to those of its neighbours, it is possible and advisable for Norfolk County to **raise prices faster than it currently does**, mainly if more significant increases are necessary to keep up with the increasing operating costs of the cemetery system.

The County needs to be ready to support larger-than-normal increases. Community members and other stakeholders (such as funeral homes) may ask a cemetery to justify price increases greater than the current inflation rate.

This can be done by informing them about the current difference between the:

- Cemetery rates they charge and the average rate at neighbouring cemeteries;
- Cemetery system's operating revenues and expenses;
- Care and Maintenance Fund (C&MF) and the projected balance required for full funding. A C&MF is fully funded when its future interest income is expected to cover its future care and maintenance costs and
- The aim of having the cemetery as close as possible to financial self-sustainability.

Greater price increases can also be paired with the owner-operator's commitment to developing and improving a cemetery's infrastructure, aesthetic, and interment capacity.

These pricing practices align with the common municipal philosophy of the 'individual user payment' and move cemetery operations towards financial self-sustainability. Many municipal cemeteries prefer this position to the whole community paying for a service subsidized by tax dollars in perpetuity.

Most municipal cemeteries are run as a service to their communities, and these municipalities support their cemetery system, subsidizing them with tax levy dollars to some degree. The County will need to decide where its business model sits on this spectrum of cost recovery. There is an understanding that few municipal cemeteries operate a full break-even cost recovery model. It is even more unusual for a municipal cemetery to operate a "for-profit" model.

NON-RESIDENT PRICING

Norfolk County charges a 35% markup on its fees to non-residents, except on veteran and infant lots. Of the benchmark communities in this analysis, Haldimand County charges a 50% markup for non-residents. In Canada, non-residents usually pay a premium for cemetery lots, crypts, and niches, ranging from 10% to 200% above the resident rate.

The purpose of the higher non-resident fee is partly an acknowledgment that residents have supported their cemeteries through their annual tax contributions for many years. Non-residents interred in municipal cemeteries usually have not made a comparable contribution.

Norfolk County defines residents as anyone living within the county limits or those residing beyond these limits whose name appears on the last revised assessment roll as a property owner or is assessed for business tax. Cemeteries that charge a non-resident premium usually define a “non-resident” as an individual who did not reside or own property in the cemetery operator’s municipality for at least one year before that individual’s date of death. Less commonly, some communities require 5 or 10 years of local residence or property ownership.

Community surveys undertaken by LEES+Associates have historically found that most resident respondents support a pricing policy whereby non-residents pay more than residents.

4.5 RECOMMENDATIONS

This chapter presents recommendations highlighting the gaps in Norfolk Cemeteries' products and services. It guides the County in aligning its cemetery pricing with best practices and adjusting its fees with the regional market value for its products and services. This will assist the cemetery system in becoming more financially self-sufficient.

To help improve the level of service to its community members and help its cemetery system become more financially self-sufficient, the County should consider the following recommendations:

- Examine the County's annual price increases each year to determine whether a greater than 3% yearly increase is warranted to offset the actual growth in its cemetery operating costs and close the gap between its revenue and expenses.
- Increase its markup for non-residents to 50% on all its offerings;
- Simplify the County's price list by using the same rates at all of its cemeteries;
- Introduce a spectrum of columbaria niche pricing in the County's price list, as is done in other communities. Increase the rate for niches located in a more attractive position (a higher level in the columbaria) and a lower/base rate for those at ground level.
- Implement a one-time increase to the County's cemetery rates as proposed as outlined in Appendix B – Price Benchmarking to better align the County's fees with the price range for cemetery services and offerings in the region, and
- Consider the possibility of adding new offerings and fees to the County cemetery price list, such as the examples in Appendix A – Products and Services Options.

5 FINANCIAL REVIEW

This chapter includes a high-level review of Norfolk Cemeteries' financial performance from **2018 to 2022**⁷ and an assessment of the sustainability status of the County's current cemetery operations. It concludes with recommendations on how the County can enhance its financial performance in the future and accelerate its progress toward short and long-term self-sustainability.

Two important performance indicators are used to assess the short-term and long-term financial health of a cemetery system's operating model are its proximity to its:

- **Break-Even Point:** This is the point in time when a cemetery can fund itself while meeting the service expectations of the community. This indicates whether a cemetery can cover its costs with its reliable sources of annual revenue and
- **Care and Maintenance Fund Stability Point:** This is the point in time when a Care and Maintenance Fund (C&MF) is fully funded and expected to generate enough investment income to meet its long-term site care and maintenance costs.

5.1 KEY FINDINGS – FINANCIAL REVIEW

The following section summarises the key findings from this plan's financial analysis.

From 2018 to 2022, Norfolk Cemeteries reported:

- An annual, average total levy impact of **\$230,000** before C&MF + Reserve Fund Contributions.
- An annual average net levy impact of **\$286,000** after C&MF and Reserve Fund Contributions.
- Its C&MF earned an annual average of **3.5%** in investment income. This is on par with the typical rates of return earned by cemeteries' C&MF's in Ontario.
- Its C&MF income was an annual average of \$40,400. This would cover **15%** of the care and maintenance costs reported to the BAO during this period.
- An annual average of \$311,000 in care and maintenance costs was reported to the BAO.

To independently support Norfolk Cemeteries' care and maintenance costs, it would need:

- \$8,900,000 in its C&MF to fully cover the cost to provide its current level of care at its current annual rate of return.
- \$4,500,000 in its C&MF to cover the cost of providing the minimum level of care required at its current annual rate of return.

⁷ A complete 2023 financial data set was not available at the time of analysis.

To ensure its financial sustainability, the County will need to take significant measures to increase its revenue, decrease operating costs, and accelerate the growth of its C&MF. Changes to cemetery pricing and financial practices are necessary to decrease the tax subsidy required to support the County's cemetery operations.

5.2 OPERATING FUND OVERVIEW

The following graph summarizes the historical operating financial performance of Norfolk Cemeteries from 2018 to 2022.

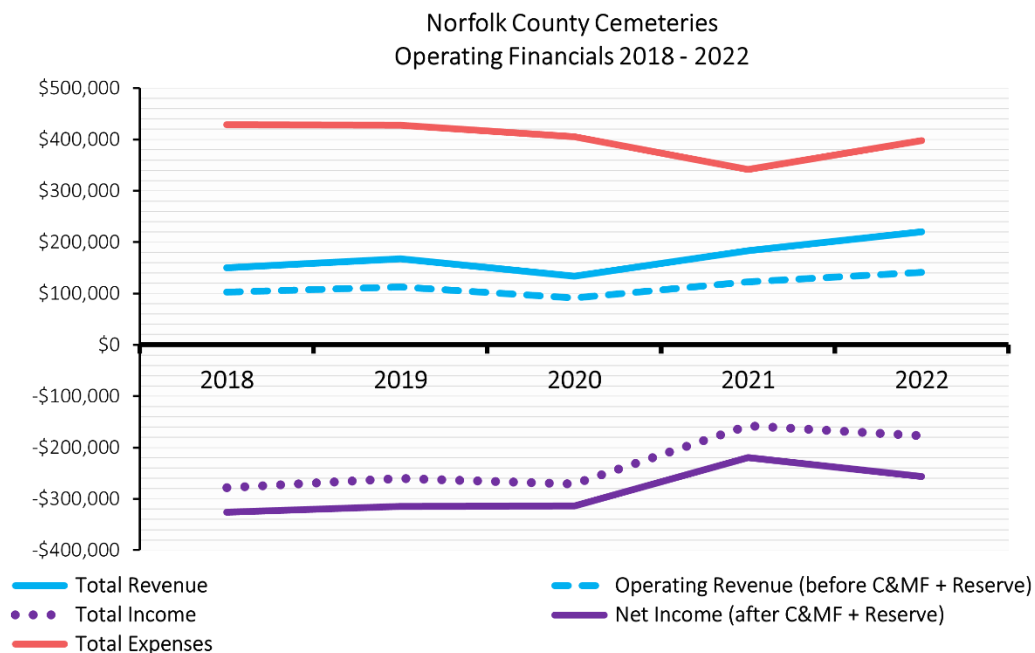


Figure 15: Norfolk County Operating Financials, Source: Norfolk County's Finance Department.

From 2018 to 2022, the Norfolk Cemeteries reported:

- An annual average of \$170,000 in total revenue and \$114,000 in operating revenue net of revenue sales contributions to the County's C&MF and Reserve Fund.
 - During this period, Norfolk Cemeteries increased its revenue by 12% annually. The population and death rate in the market area increased over this period as well, likely contributing to increased activity.
- An annual average of \$400,000 in total expenses.
 - Norfolk Cemeteries expenses decreased by an average 7% per year from 2018 to 2021 and then increased by 16% in 2022.
- An annual average total levy impact of \$230,000 and a net levy impact of \$286,000 net of revenue sales contributions to the County's C&MF and Reserve Fund.

Norfolk Cemeteries' operating financial performance is comparable to that of similar-sized cemeteries across Ontario. Most municipalities in Canada run their cemeteries at an operating loss and support their operations to some extent with tax levy dollars. This is because cemetery revenue rarely fully funds operating costs—much less capital expenditures. Capital cemetery infrastructure and land development costs are almost always supported by a municipality's property or other tax revenues.

LEES+Associates has found that of the North American municipalities it has assessed over the past decade, the majority prioritize supporting their cemeteries as a community service to their residents. They strive to improve their operations' financial performance to move towards break-even and eventually fully cover their operating costs. This strategy's main objective is to steadily reduce the demand on the community tax base.

5.3 HISTORICAL CARE AND MAINTENANCE FUND OVERVIEW

A key factor in a cemetery's future viability is the adequacy of its Care and Maintenance Fund (C&MF) (once known as the "Perpetual Care Fund"). Canadian cemeteries usually contribute a portion of their sales revenue to the principal of a long-term investment fund (e.g., trust, GIC), which is expected to fund the care of the cemeteries in perpetuity. In Ontario, such a trust, including specified percentage of contributions under specific categories of sales, are required by provincial regulation.

This obligation for a cemetery's care and maintenance is expected to begin when the cemetery is established, extend through the period during which it is active and generating revenue, and continue long after the site is full and no longer generating revenue. The C&MF principal is expected to generate income either retained in the fund to generate compounding returns or withdrawn annually to pay present-day site care and maintenance costs.

When inheriting abandoned or formerly private cemeteries, as is the case with Norfolk County, complete records and historical C&MF contributions are not a guarantee. If present, the amounts held in trust are sometimes negligible. This has led, in Norfolk's case, to C&MF funds that are underprepared for the needs of the current and future system. Most often, the reason for the lack of C&M funds is because older graves were purchased prior to the C&MF requirement, and/or because the fees charged for them were so minimal. Planning for a fully funded C&MF involves comparing the investment income and maintenance costs projected when a cemetery site is expected to become inactive. The future investment income the C&MF generates must be equal to or greater than the projected maintenance cost. Once the investment income needed has been established, it is possible to identify the C&MF end balance and the revenue contributions needed during a cemetery's active time horizon to reach that end balance.

Cemeteries are unique facilities and services, usually constrained in their governance by Provincial legislation, which stipulates that cemetery owners must provide "care and maintenance" of their properties in perpetuity. This legislation mandates that:

- A cemetery C&MF should be managed very conservatively.

- Access to the C&MF principal is restricted, and investment income can only be spent on current cemetery care and maintenance.

The intent is for the C&MF's income to offset inflation, providing it with funds to pay for a higher site maintenance cost in the future when there is no further sales revenue to support it.

Appendix E outlines the provincial legislation regarding Ontario's Care and Maintenance Funds for cemeteries.

This chapter focuses on assessing the financial health of the County's primary Care and Maintenance Fund for the majority of its cemeteries. In addition, the County manages the independent trust funds of 4 private cemeteries with external boards: Bookton, St. Peter's, Courtland United, and Bethel Methodist Cemetery. These trust funds are managed and reported separately from the County's primary C&MF. An assessment of these secondary C&MFs (currently amounting to \$150,000) is not included in this analysis.

The following table lists all the elements contributing to the County's combined primary Care and Maintenance Fund from 2018 to 2022, as reported to the BAO in those years.

C&MF Elements	2019	2020	2021	2022	2023
Opening Balance	\$1,090,434	\$1,120,696	\$1,131,980	\$1,229,148	\$1,274,619
Annual Contributions	\$30,262	\$11,284	\$97,168	\$45,471	\$47,929
Investment Income Earned	\$32,783	\$59,436	\$34,274	\$33,691	\$41,682
Extraordinary Adjustment ⁸	\$0.00	\$(2,175)	\$0.00	\$0.00	\$0.00
Income Withdrawn	\$(32,783)	\$(59,436)	\$(34,274)	\$(33,691)	\$(41,682)
Rate of Return	3.0%	5.3%	3.0%	2.7%	3.3%
End Balance	\$1,120,696	\$1,131,980	\$1,229,148	\$1,274,619	\$1,322,548
Maintenance Costs	\$415,481	\$407,305	\$312,724	\$225,297	\$195,658

Table 7: Norfolk Cemeteries C&MF Activity Data reported to the BAO from 2018 to 2022,
Source: The County's Finance Department, BAO Reports.

The following graph summarizes Norfolk Cemeteries' primary C&MF's historical performance from 2018 to 2022. The C&MF's historical end balance is shown on the left vertical axis, and its investment income and site care costs are displayed on the right vertical axis.

⁸ This extraordinary adjustment was due to a correction of a prior year amount that was done by a prior employee in 2019.

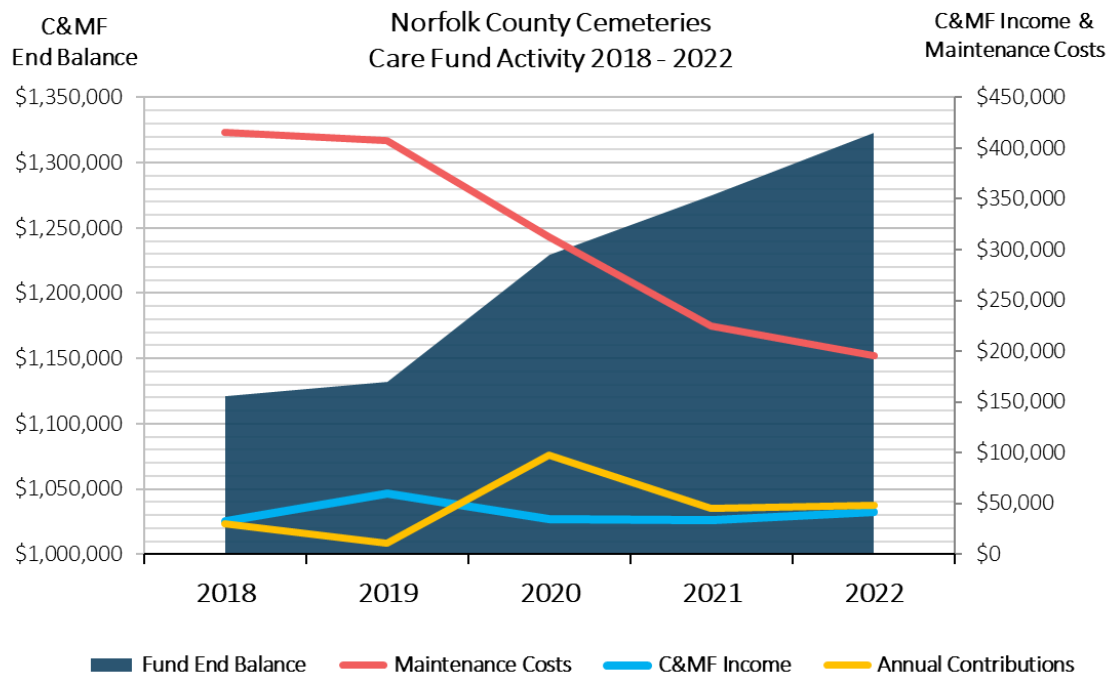


Figure 16: Graph of Norfolk Cemeteries Primary C&MF Activity Data reported to the BAO from 2018 to 2022, Source: The County's Finance Department, BAO Reports.

Norfolk County needs to prioritize reducing its C&MF's income-cost gap. This is the difference between the income earned by its C&MF and the expected cost to maintain the site at the level of care the County designates for its cemetery site after it becomes inactive.

The C&MF income returns reported by cemeteries to LEES+Associates in the past five years have usually ranged between 1% and 5% per year. From 2018 to 2022, the County's C&MF earned an annual average interest rate of **3.5%**. This is on par with the average rate of returns from a C&MF typically received by municipal cemetery operators in Canada during this period.

Historically, the County has withdrawn the majority of the income earned by its C&MF. This is a common practice. Municipal cemeteries often withdraw some or all of their C&MF income annually. However, by withdrawing the income from its C&MF, the County is not allowing it to grow as much as it could.

Increasingly, municipalities are moving towards the best practice of retaining their income within the C&MF and not withdrawing it until after the C&MF is determined to be >75% funded. The primary reason for this is to take advantage of compound interest, which significantly helps to accelerate C&MF growth.

A C&MF's income must exceed the cemetery's care and maintenance costs to be sustainable. A C&MF is adequately funded when its projected end balance is expected to generate sufficient income to cover its future care and maintenance costs when it becomes inactive and no longer sells lots.

From 2018 to 2022, the County recorded an average of \$311,000 per year in cemetery care and maintenance costs, and the C&MF earned an average of \$40,400 per year in interest income.

This is 15% of the cemetery’s average care and maintenance costs. Fortunately, maintenance needs usually decrease when a site becomes inactive due to fewer community members visiting and lower community expectations for the standard of site care. Consequently, maintenance costs for an inactive cemetery site are expected to decrease proportionally to the decline in use.

The standard practice in C&MF planning is to assume that the costs to care for the cemetery in the future when the site becomes effectively inactive (no longer selling graves or accommodating new services) will not be less than 50% of the expected cost at its current level of care. This is assumed to be the cost for the minimum level of care at an inactive cemetery.

The best practice for planning the future care of inactive municipal cemeteries is to proactively accelerate C&MF growth to a balance that will generate an adequate income to cover the site’s maintenance costs at a higher than minimum level of care, with a ‘risk management buffer’ to account for extraordinary costs (to repair unforeseen damage due to weather, vandalism, etc.).

Municipalities often maintain inactive cemeteries at the same level as their parks to encourage community members’ ongoing use and visitation of these sacred cultural heritage landscapes. Ultimately, the level of care the County chooses to maintain its cemetery when it becomes inactive is a philosophical choice made by the Council based on the County’s vision and preferred long-term use of these lands by its community members.

The County should, at a minimum, plan to maintain its cemetery at a level that will ensure public safety, accessibility, and an aesthetic that preserves the dignity of the site and is appropriate to the memory of community members buried here.

5.4 C&MF GROWTH STRATEGIES

The following table summarizes common strategies to enhance the C&MF and improve its sustainability. This is not a menu of recommendations but a list of potential strategies. Some or all of these options may be implemented to achieve a better-funded and more resilient C&MF.

1. Retain and Compound Interest Income.

This strategy entails a municipality reducing the amount it withdraws or stopping withdrawing investment income from its C&MF to offset current site care costs. This option will drive the compound growth of the fund’s monies. This County should consider this option. It is currently withdrawing all of its C&MF income.

2. Substantially Strengthen the Principal.

This strategy entails directly increasing the principal and future interest income by making extraordinary, fixed contributions to the C&MF from a general tax fund, a discretionary reserve fund, community donations, or an asset sale. This is the County’s most powerful tool for increasing the C&MF’s growth in the short term. The contribution size depends on how quickly the County wishes to make the cemetery’s site care financially self-sustainable.

3. Increasing the Annual Interest Rate of Return.

This strategy entails comparing the available professional organizations offering financial services and researching the range of instruments available for cemetery operators to invest their funds reliably and conservatively while generating a better return.

The County's historical rate of return is on par with the C&MF income earned by other municipalities. There may still be more significant earning potential than is currently being realized. Exploring a range of investment specialists and portfolio options is a best practice.

4. Increasing the Percentage of Sales Contributions.

This strategy entails increasing the portion of cemetery sales revenue allocated to the cemetery's C&MF above the minimum Provincial legislation requires. This strategy is unlikely feasible for the County as it is not breaking even.

5. Increasing the fees for the Cemetery's inventory.

This strategy entails increasing total revenue by increasing the fee per sale and consequently the C&MF contribution for each sale. The higher prices proposed in Appendix C will help to increase the value of the County's annual sales contributions to the C&MF.

6. Decrease care and maintenance costs and mitigate increases from inflation.

This strategy entails proactive cost control measures that examine and identify the most effective and efficient means of delivering the minimum standard of expected site care. Other cemeteries have successfully implemented measures to reduce costs, such as outsourcing site care and engaging volunteers from the community in clean-up events.

Table 8: Common Strategies to Accelerate C&MF Growth, Source: LEES+Associates.

5.5 RECOMMENDATIONS – FINANCIAL REVIEW

To improve the financial sustainability of its cemeteries Norfolk County may consider the following recommendations:

- Increase operating revenue and C&MF contributions by serving more community members at Norfolk Cemeteries. This includes:
 - Diversifying and personalizing the cemetery's services and offerings in a way that appeals to community members' preferences;
 - Developing and implementing a passive marketing plan to increase community awareness of the cemetery; and
 - Consider investing in events at the cemetery to increase community engagement.

- Where appropriate, develop and implement a pre-need sales strategy to move up the time when community members purchase their cemetery lot, niche, markers, etc.
 - Develop relationships and/or partnerships with service providers and community organizations to educate their members about the cemetery and its services.
- Undertaking an in-depth operations cost analysis to identify improvements and efficiencies to be gained that could reduce costs.
- Getting contractors' quotes for interment services and site care at the cemeteries. Compare these to the cost for County staff to undertake these tasks.
- Accelerate C&MF growth by implementing the following additional measures:
 - Decrease or stop the annual withdrawal of C&MF income to take advantage of compound interest
 - Consider making a one-time significant principal contribution or series of smaller contributions from a County revenue source outside its direct cemetery operations. This could include a transfer of funds from other County reserves.
 - Consider if there might be investment opportunities that could garner higher rates of interest; and recognizing the requirement to following provincial regulations.
- Periodically and regularly, monitor and evaluate the community members' response to the new prices, offerings, and other changes implemented under this plan.
- Consider if there may be value to undertake a complete Financial Plan that includes an in-depth assessment of Norfolk Cemeteries' revenue and expense sources, current financial data management practices, and future projections for Norfolk Cemeteries' operating financials and C&MFs.

6 STRATEGIC DIRECTION

With the number of cemeteries transferred to Norfolk County in recent years and the latest transfer of Delhi Cemetery, the system has reached a watershed moment. A strategic approach to ensure sustainable management and operation will establish a blueprint for the next 25 years. Addressing several key factors including revenues and operational costs, d service offerings, service delivery, and planning for future needs will help achieve this. This chapter outlines the strategic direction necessary to address these challenges and opportunities, ensuring the County's cemeteries can continue to serve the community effectively and efficiently.

Norfolk County's cemetery system currently comprises 49 cemetery sites in three categories: active sites, where lots are regularly sold and interments take place; semi-active sites, where interments take place for existing rights holders; and inactive cemeteries, which the County maintains under provincial legislation despite generating no revenue. The County stretches approximately 60 kilometers (37 miles) from east to west and about 40 kilometers (25 miles) from north to south at its widest points. The County's size presents logistical challenges in managing its cemetery system. In addition, a significant factor in cemetery management is that there is a very strong sense of self-identity among the County's various towns, villages and hamlets, where communities often have a strong affinity for their cemetery. Transferring private cemeteries to the County has created a significant discrepancy between revenue streams and operational costs across the County's cemetery network. Regulatory authorities direct that when a cemetery is transferred to a municipality, the C&MF must come with it, and the financial impacts of the transfer to municipal authority would be reduced as a result. In practice, there is no guarantee that a C&MF is adequate or present, which is a situation Norfolk County has encountered as its cemetery system has expanded. Therefore, thoroughly examining best practices for operations, especially at non-revenue-generating sites, is essential to manage operating costs and improve financial and operational sustainability.

Norfolk Cemetery System: Addressing Demands for Resources + Service Delivery



6.1 ORGANIZATION, PRACTICES, AND RESOURCING

Balancing Public Expectations and Financial Sustainability - Balancing the need to meet public expectations with the financial realities of operating an extensive cemetery system requires careful planning and communication. As mentioned in Chapter 4, most municipal cemeteries are run as a service to their communities, and these municipalities support their cemetery system, subsidizing them with levy tax dollars to varying degrees.

The following strategies will assist the County in determining the resources it needs to run its cemetery system while offsetting those costs as much as possible through various means.

Role of Volunteers, Advisory Committees + Cemetery Boards

There are limitations to County resources and contributions by the residents are an important tool to foster success within remote and rural cemeteries. It is recommended that the County identify opportunities for volunteers for short-term project-specific initiatives and/or for ongoing advisory roles.

With respect to six hybrid County-owned/board-operated cemeteries, the County should continue to leverage volunteers with active roles in community cemeteries, working with each group to clearly define the roles and work toward a consistent approach to volunteer roles throughout the community. Operationally, however, LEES recommends that the County prepare to take over full responsibility for all finances, rate setting, customer care, capital planning, and general oversight of each site. The County can do this with a consistent and systemic approach. This recommendation is made recognizing various factors involved including the identities of the various communities, increased levels of regulation, and that volunteerism in cemeteries has moderated over time. There are other factors that the County would likely also consider.

Continuance of advisory committees or cemetery boards of directors is a common practice with some municipal cemetery systems across Ontario, particularly those with limited resources. Leveraging volunteers can supplement gaps in municipal delivery, as well as provide residents with a platform to provide meaningful insight regarding the needs of the community. This can be particularly important with amalgamated municipalities where residents desire a voice within their immediate local context. At the same time, this can add a layer of bureaucracy that might impact on a systemic approach; and the County bears the ultimate responsibility for the care and operations of cemeteries. Community advisors – whether as individual local boards or as part of a larger advisory committee – are often particularly helpful as it relates to on-the-ground knowledge and expertise.

Potential volunteer activities for consideration include:

- Board or advisory committee participation with a mandate for items such as reviewing staff reports, advising staff, administrative duties with staff oversight, customer services support, organizing programming activities, and organizing/completing maintenance opportunities. A clear delineation of responsibility and authority between volunteers and the County must be established to create clarity and reduce potential conflicts.

- The County, in utilizing existing boards, should improve liaison and increase oversight through regular meetings with staff participation.
- If the County chooses to continue utilizing hybrid Boards, as existing board members age out of their roles, the County must work to foster renewed participation through active marketing in communities.
- Spring clean-up of garbage and fallen branches.
- Program development and execution of non-bereavement cemetery grounds- hosted activities such as historical tours, nature tours, and compatible fitness activities.
- Program development and/or execution of bereavement-related events such as Mothers/Father's Day, events to facilitate connection and remembrance (i.e. Night for All Souls, Mountainview Cemetery, Vancouver; Decoration Days, etc),
- Aligning with a service fee, preparation and/or maintenance of graveside flowerbeds, including the removal of grass 15" out from the base and width of the monument and adding soil. Trimming turf from around flat markers. Note that this action may both identify trigger the need to lift flat markers to mitigate trip hazards and the lifting/leveling work must be performed by staff.

Norfolk County also operates a subsidy program for Board-operated cemeteries, offering both funds and in-kind support to keep these non-municipal cemeteries viable. It is recommended that the County continue this practice and bolster the fund, as these investments can be viewed as high-return through the reduction of burden on Norfolk County in the future.

Human Resource Needs

Staffing levels have been identified as a possible issue through the stakeholder engagement undertaken in 2024. With operations and maintenance staff also working outside the cemetery system, a review of these competing priorities would help determine if this has impacted on service and maintenance levels at cemeteries. Examples of competing demands include:

- Grounds keeping at non-cemetery locations;
- Panorama Christmas light program;
- Winter Control for municipal walkways and facilities;
- Tasks / Site checks arising from homelessness impacts;
- Trails tasks; and
- General parks tasks.

Given the growth and complexity of Norfolk County's cemetery system, which continues to grow as more cemeteries are taken on by the County, understanding the demands on staff will support a broad understanding of resourcing needs. It may be found that a dedicated unit of staff is necessary to operate active and semi-active cemeteries and achieve a reasonable standard of care for semi-active and inactive cemeteries.

In LEES experience with cemetery operations across Canada, if a cemetery system has a small HR to Land ratio, along with below-average site care conditions and limited allocated resources with no redundancy, this can indicate that a municipality needs to increase the number of its cemetery workers and increase the budget for its labour resources. Other influencing factors include morale, experience/skill level of staff, lack of staff training, quality of management and work environment. These aspects can increase the effectiveness of a low ratio or decrease the effectiveness of a high ratio, making staffing level ratio only a starting point to guide a more in-depth review.

Along with a reasonable ratio, it is important to have a field staff complement that can be deployed into properly sized working groups or 'pods' to meet safety and efficiency requirements. Field staff resources should be sufficient to ensure minimum working group sizes and provide flexibility to cover absences. Currently, Norfolk County cemeteries effectively have one field pod. LEES has observed in its cemetery operations reviews over the past two decades that this particular scenario tends to correlate with a history of service disruption due to the absence of key staff and a subsequent increase in customer complaints.

Notably, at the supervisory / cemetery administrative staffing level, Norfolk County has recently experienced a full staff turnover due to retirement. While this has come with a loss of institutional knowledge, it also presents opportunities to embrace the kinds of positive change suggested in this Plan. Parks and Recreation Systems often use the measure of FTE or "full time equivalent" to quantify their human resource needs, manage budgets, and evaluate the efficiency of their operations. One FTE represents the number of hours worked by one full time employee over one year. FTE is an especially helpful metric to use in systems where employees work different number of hours or on tasks with different operating budgets.

FTE levels can be measured by the area of the cemetery or the number of interments. These guidelines, relate to the parameters of site area (amount of area to be maintained) and number of interments (the annual number of openings and closings).

A review of urban Ontario municipal cemetery organizations indicates that a ratio of one full-time employee for every acre of developed cemetery land yields optimal results. This number is derived from urban municipal cemeteries that operate multiple sites over a large land area. When limiting the comparison to municipalities with a similar number of sites, number of inactive sites, and geography as Norfolk County, a **ratio of one full-time employee for every 5-8 acres of developed cemetery land** is a reasonable staffing target to ensure the Level of Service falls within the range of 'Basic' to 'Average'. Another reasonable metric to measure minimum staffing needs is one FTE per 35 to 40 interments, however this metric may not account for the needs of the volume of inactive cemeteries. Variables that Norfolk County will wish to consider that influence this calculation include contracted services, the roles of volunteer Boards, support from other departments, etc., as FTE can be accounted for through alternative means outside Norfolk County employed staff.

At a glance, Norfolk County has approximately 67.5 acres of developed active cemetery space and 22.4 acres of semi-active cemetery spaces. Using the aforementioned ratio, that would project a need for 8.5 FTE at active cemeteries and 3 FTE at semi-active sites. This is a useful starting point for Norfolk County to determine its real staffing needs.

To establish a metric that can be scaled and monitored as the Cemetery system evolves, Norfolk County should conduct a baseline staffing needs assessment that incorporates the total acreage of developed cemetery lands, the number of interments, the number of sites, and the desired level of service the County wishes to achieve. It should also look at the costs of services contracted out and compare those costs to conducting the same services in-house and should monitor this for each cemetery to determine the best avenue to service each site.

Another vital factor in staffing will be determinations around service levels, as per the categories laid out within this report. As well, proper training will increase the efficiency of operations and maintenance staff. Where staff levels increase, the County should re-assess the service levels it is achieving as a matter of continual improvement.

Leveraging Bylaws

Norfolk County as the cemetery owner, is responsible for all activities within the cemeteries it owns and controls. An outdated, weak, ambiguous, or incomplete cemetery bylaw can result in frequent complaints from users and visitors and potentially expose the County to legal risks and financial liability.

Norfolk County currently has multiple bylaws specific to each cemetery site. A few rural sites do not have a formal bylaw and the Oakwood bylaw has been operationally applied. This can be problematic for both staff to administer and the public to follow. LEES recommends that Norfolk County develop a consolidated bylaw to govern all cemeteries within the system.

A consolidated bylaw will:

- Set clear unified standards for design, service, maintenance, and the types of products permitted in the cemetery, minimizing variations where possible.
- Recognize unique aspects of individual cemeteries through appendices/special provisions, which will reinforce that these rules are not standard and do not apply to all cemetery sites.
- Safeguard the County as the cemetery operator and support its ability to reasonably establish, implement, and enforce rules for all users.
- Ensure rules are aligned with current cemetery and related legislation and regulations.
- Respect parameters outlined in historical bylaws while placing prominence on new consolidated standards. This can be achieved through a clause that recognizes the validity of past bylaws and outlines a process to address conflicts between past and current standards. By shifting the onus onto customers to request provisions, the County can more effectively shift expectations and practices to optimize operations.

A strong cemetery bylaw is the foundation for a cemetery's professional management, operation, service provision, and maintenance. An effective cemetery bylaw guides every action undertaken by the cemetery operator related to the management and operation of the cemetery (or cemeteries) under their ownership or control.

A cemetery bylaw that is kept current and updated regularly will demonstrate to cemetery users that the cemetery is being operated and incorporating current best management practices, professional service delivery, and high aesthetic appearance standards. Additionally, to maintain the trust established between the cemetery user and the cemetery operator, the bylaws, rules, and regulations must be applied with transparency, equitably, and consistently enforced.

The cemetery bylaw establishes operating policies and procedures to guide the cemetery's long-term, day-to-day administration, service provision, and maintenance. By clearly establishing the cemetery's rights, rules, and regulations, an operator can minimize potential problems, conflicts, disagreements, or exposure to litigation.

A strong cemetery bylaw is an essential tool in organizational risk management. Given a cemetery's long-term, successional life, the bylaw is a critical administration element, as responsibility regularly transfers to new generations of cemetery management and staff.

A comprehensive, effective, enforceable bylaw will be the foundation for managing, operating, and maintaining a modern, sustainable cemetery. The bylaw should be easy to understand, apply, and enforce, whether used by the cemetery operator, a client family, cemetery visitors, or an outside service provider.

Ontario Regulatory Framework - The municipal cemetery operator has three main areas of accountability in operating the cemeteries under their control. In equal measure, the municipality is directly answerable to:

- Cemetery Users - The bereaved families to which cemetery goods, services, and facilities are provided.
- Municipal taxpayers - To residents, as represented by the Mayor and Council, through whom the City's assets are protected and ensured to be operationally sound, environmentally sustainable and managed with fiscal prudence.
- Provincial Registrar: who, through their oversight role, ensures cemeteries are operated in accordance with the law, transparently and equitably, with a focus on consumer protection and safety through care and maintenance.

In Ontario, the Bereavement Authority of Ontario (BAO) is responsible for regulatory oversight of cemeteries. As a government-appointed body, the BAO's mandate is to regulate and ensure compliance with the law while providing resources and services to the funeral, cemetery, and crematorium professions.

The Bereavement Authority of Ontario (BAO) administers the *Funeral, Burial and Cremation Services Act, 2002 (FBCSA)*. This act consolidates the *Cemeteries Act* and the *Board of Funeral Service Act* and is the source for legislative language and regulations governing cemeteries.

Bylaws as Risk Management - Whether for regular operation and maintenance, resolving a simple complaint, satisfying the regulator or, worst case, dealing with legal action against the cemetery, resolution will most likely be based first on an examination of "what does the bylaw say?". In that instance, if the cemetery bylaw can be shown to be outdated, ambiguous, inconsistent with legislation or silent on critical cemetery management, operation and maintenance matters, then this shortcoming in the bylaw may expose the County to considerable punitive risk.

While recognizing the above, it should also be noted that former cemetery bylaws never fully go away, given the nature of multi-generational cemetery use. By provincial regulation, the bylaw that applies to any grave is the one that was in place when the interment rights were purchased. Because Norfolk County's acquired cemetery bylaws vary from location to location, and sometimes aren't known to the County, the development of a consolidated bylaw should have built-in flexibility for dealing with rights-holders who bought under previous bylaws.

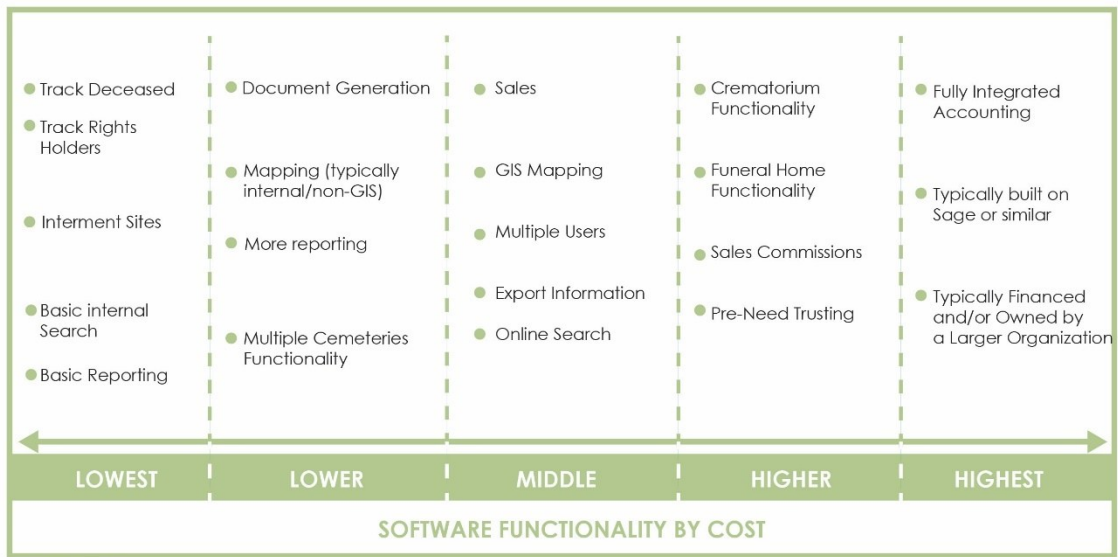
Software Tools

Norfolk County currently uses a combination of hardcopy files, Microsoft Excel, and a cemetery-specific software for its records management. The software used was previously industry-standard but many operators have noted lowering service levels and a lack of features available on newer, and sometimes less expensive, cemetery records management software.

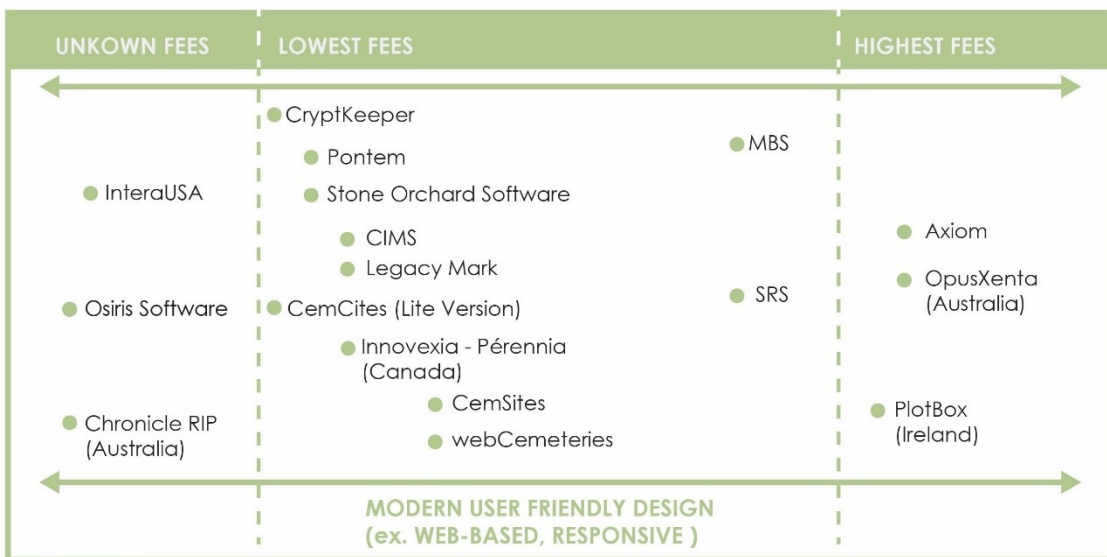
A reliable, user-friendly cemetery records management system is considered to be the best practice for cemeteries. The system should provide comprehensive reporting for all customer and inventory data, as well as interment and sales activity. New developments in records management systems have additional capabilities to support operations management and facilitate the execution and tracking of work orders.

There is a demand for online service capability to include a searchable database with up-to-date information on the location of graves and headstones. This supports visitors for both grief-related purposes as well as facilitates the increasing interest to access records for genealogical research, and access to community history. In addition, it reduces impacts on staff time taken up by public requests to search the same information, which can be a significant resource pressure. The County should explore options to transition, cemetery system-wide, to a cloud-based records management software such as Perennia (perenniasolutions.ca), inbyond cloud or beyondpro (i.e., <https://opusxenta.com>), webCemeteries (<https://webcemeteries.com>), or PlotBox (<https://www.plotbox.io/>). This would better facilitate sales and field management, however, selecting a system that will integrate and/or facilitate a reasonable transfer of data is important, especially in terms of transferring data between cemetery and finance staff.

The below figures highlight the features and costs of other software tools.



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Figure 17: Software Functionality and Performance Comparison Diagrams, Source: LEES+Associates.

6.2 OPERATIONS AND MAINTENANCE

Legislated Requirements and Best Practices

In this operational best practice review, the level of service of the municipal cemetery system is measured on a scale of Basic (Legislative Minimum), Average (Common Practice), and Optimal (Best Practice). Cemeteries must also be operated pursuant to requirements under the Act and Regulations [s.5(3)], [Reg.30, s.119]

The requirements for cemetery site conditions and operations, as described by FBCSA regulations, are subjective and do not explicitly describe the criteria for every element contributing to the County's level of service, and with a focus on safety and consumer protection. Therefore, the County should look at comparing regional standards set by its peer municipalities when evaluating and setting target service and care levels. The standard of care executed by other municipalities is tangible to the general public and influences the level of perceived satisfaction and service/product value.

The Province of Ontario is not prescriptive in its legislation and regulations regarding how these goals are to be accomplished by cemetery operators, they simply mandate that these are to be met. Whether a cemetery is meeting these standards is largely based on the judgment of the BAO and the reports of community satisfaction in its interaction with the Municipality's cemeteries and its employees. As with many provincial regulations, industry standards can also be expected to be applied as it pertains to the interpretation of regulations.

There is a direct correlation between the level of care and service applied with a cemetery operation and the amount customers are willing to pay. The level of care administered to a cemetery is an investment in revenue generation and enhances the reputational benefits to the municipality as a whole. If a cemetery is no longer conducting sales at a specific location, there is a justification for reducing maintenance towards a basic level of care, however, this needs to be strategic and well-communicated to manage public expectations and acceptance.

Industry Standard Levels of Service

Basic Level of Service	The basic level of service is benchmarked to the minimum standard needed to meet the expectations of FBCSA’s cemetery operations regulations, described as follows: ▪ Ensure the cemetery grounds, including all lots, structures, and markers are maintained to ensure public safety; ▪ Ensure the cemetery grounds, including all lots, structures, and markers are maintained to preserve the dignity of the cemetery; ▪ Provide reasonable access to the cemetery, and ▪ Ensure the cemetery signage is visible to the public and includes the operator’s name.
Average Level of Service	The average level of service is benchmarked to the common standard of care implemented by peer municipalities to meet FBCSA’s cemetery operations regulations. ▪ Having a person-in-charge at the cemetery (OR 30/11 S. 22); ▪ Ensuring that employees perform their duties, are following the Act and Regulations, and are licensed if they are selling interment rights as their primary occupation (FBCSA S. 5[5]); ▪ Conducting interments in a decent and orderly manner; ▪ Always maintaining quiet and good order in the cemetery; ▪ Ensuring cemetery grounds, including all lots, structures, and markers are maintained to ensure the safety of the public and preserve the dignity of the cemetery (FBCSA S. 5[3]); ▪ Providing reasonable access to the cemetery and to a lot at any time, as per the Cemetery Bylaws (OR 30/11 S.156), and ▪ Providing full disclosure on their contracts, by-laws, price lists, website, and promotional materials. (OR 30/11 S. 112 -119).
Optimal Level of Service	The Optimal level of service is benchmarked to the best practices and ideal standard of care implemented by Ontario’s most proactive municipalities. This objective of achieving an optimal level of service is to maximize a cemetery system’s operational efficiency, service effectiveness, and community satisfaction. Cemeteries with an optimal level of service are highly attractive, take advantage of economies of scale and consistently exceed FBCSA’s regulations.

Maintenance Service Levels

Balancing the need to meet public expectations with the financial realities of operating an extensive cemetery system requires careful planning and communication.

Municipal cemeteries, such as in Norfolk County, are run as a service to their communities relying on subsidization of costs with tax dollars to some degree. Norfolk County should determine the maintenance and service levels they wish to achieve for each; and recognize the associated level of subsidization required to attain this. c.

Level of maintenance services can strive to deliver equitable standards of care for every Cemetery site. However, this may not be achievable or fiscally responsible in the context of public tax subsidization. Alternatively, maintenance frequency and level of care can be assigned in a tiered approach and directly correlate to the public use and programming of the cemeteries. A cemetery that facilitates active sales and interments and has a high level of grief-focus visitors may warrant a higher level of care than a cemetery that is less active for interment use and there is a greater recreational focus for visitors.

A tiered service level approach to maintenance can still offer a dignified and respectful cemetery setting providing the level of maintenance is clearly established, and executed with consistency.

Alternative Maintenance Approaches: Cemeteries in different locations have found a wide variety of ways to achieve goals. While the following alternative examples may not be suitable for many locations, the main goal of presenting them is to inspire out-of-the-box approaches to achieve goals. These may include:

- **Autonomous Lawn Mowers:** Robotic lawn mowers are a growing option to improve efficiencies. Models that are GPS-enabled allow for deployment for simpler zones within specific lower-activity cemeteries. Robot mowers are now heavy-duty and capable of mowing field-height grass. Consider tools such as Husqvarna robotic lawnmowers, and radio frequency interface devices to support manual lawn mowing practices and to deploy at rural cemeteries. To mitigate theft, consider constructing a secure unit for the mower to return for charging, post-job retrieval, and/or less visible night operation.



Figure 18: Image of robotic lawn mower. Source: LEES+Associates

- **Naturalization to reduce maintenance:** Bayview Cemetery is an example of a location that could have larger areas converted to naturalization (areas that are problematic for traditional casket burial due to cultural artifacts) within the traditional cemetery context. Areas such as this can be transformed into naturalized features through meadow or forest plantings, pathways, and seating and reduce maintenance requirements to an area that is not profitable. Alternative turf treatment examples include low-grow turf varieties, micro clover, sun or shade meadow species, and/or mulching. As the tree canopy increases, the speed of turf growth will dissipate and maintenance activities may be reduced to monitoring and reactive interventions related to invasive species management.
- **Changing the script on the standard cemetery aesthetic:** When confronted with the future upkeep of cemeteries and the desire to preserve a respectful and well-cared-for environment. Conservation-focused cemeteries are capturing the interests of both customers and operators for the benefit of a low-impact sustainable landscape that contributes to habitat gain and combats climate change. These cemeteries are naturalized landscapes, integrating with existing natural features and/or part of re-naturalizing initiatives. This approach offers opportunities for cemetery operators to team with conservation agencies to develop protected habitats and unlock regulated lands for cemetery use. The local Conservation Authority should be consulted as potential partners for future development. Below is a sample list of successful conservation-focused, large scale naturalized cemetery treatments, and resources:



Figure 19: Larkspur Conservation Burial at Taylor Hollow, Nashville, TN Source: Conservation Burial Alliance

- The Woodlands at Royal Oak Burial Park, Victoria, British Columbia
- Bluestem Conservation Cemetery, Cedar Grove, North Carolina
- Salt Spring Island Natural Cemetery, Salt Spring Island, British Columbia, <https://www.canada.ca/en/environment-climate-change/services/nature-legacy/campfire-stories/supporting-biodiversity-life-death.html>
- Memorial Ecosystems and the Ramsey Creek Preserve, Westminster, South Carolina, https://www.memorialecosystems.com/defining_conservation_burial.html

- **Milton Fields Natural Burial Ground (Atlanta, Georgia):** When confronted with the future upkeep of cemeteries and the desire to preserve a respectful and well-cared-for environment. Conservation-focused cemeteries are capturing the interests of both customers and operators for the benefit of a low-impact sustainable landscape that contributes to habitat gain and combats climate change. This cemetery utilizes sheep grazing to manage its lands. Sheep are best for lawn grazing as they prefer tender lawns. They were historically used to create manicured lawns before the evolution of the lawn mower. The Basilica of St. Patrick's Old Cathedral in New York City is another of many examples of cemeteries leveraging the power of sheep to improve maintenance and garner some positive publicity.
- **Grazing goats help restore Mississauga's wetland:** The City of Mississauga commenced a trial piloted prescribed grazing to manage invasive species in wetland locations. Goats are ideal for targeted clearing as they prefer large herbaceous specimens and shrubs, leaving the smaller tender grasses behind. Within the cemetery context, goats are ideal for invasive species management in naturalized areas and for clearing land.



Figure 20: Image of Goat Grazing Program Source: City of Mississauga

<https://www.mississauga.ca/city-of-mississauga-news/news/you-herd-it-here-first-grazing-goats-help-restore-mississaugas-wetland/>

Figure 21: Image of Sheep Grazing Program, Source: National Catholic Reporter, CNS photo/Gregory A. Shemitza

<https://www.ncronline.org/blogs/eco-catholic/sheep-grazing-nyc-church-cemetery-keep-grounds-tidy>

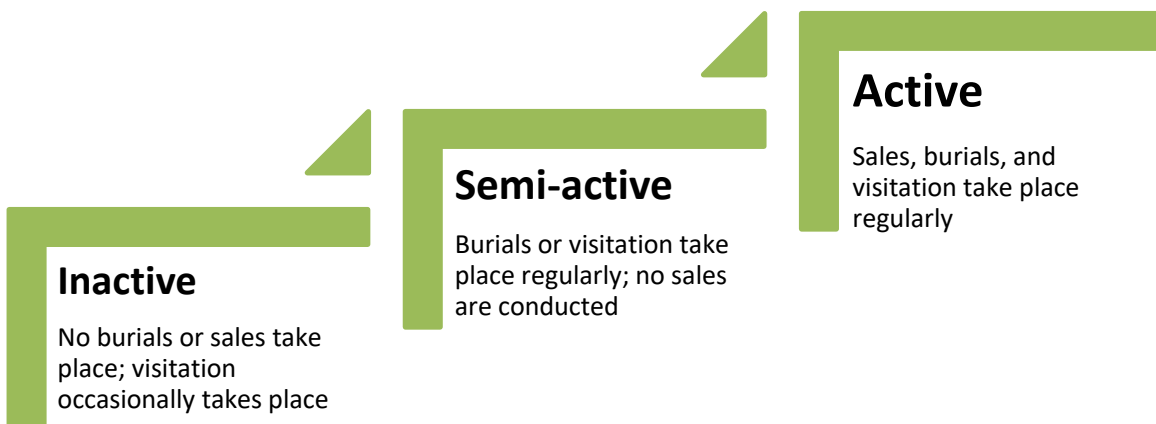


6.3 ALLOCATION OF MAINTENANCE RESOURCES

Norfolk County should consider the establishment of simple categories for its cemeteries to help create clarity around obligations, needs and costing. These recommended categories and associated operations and maintenance needs are outlined below.

1 | CEMETERY STATUS WITHIN THE SYSTEM

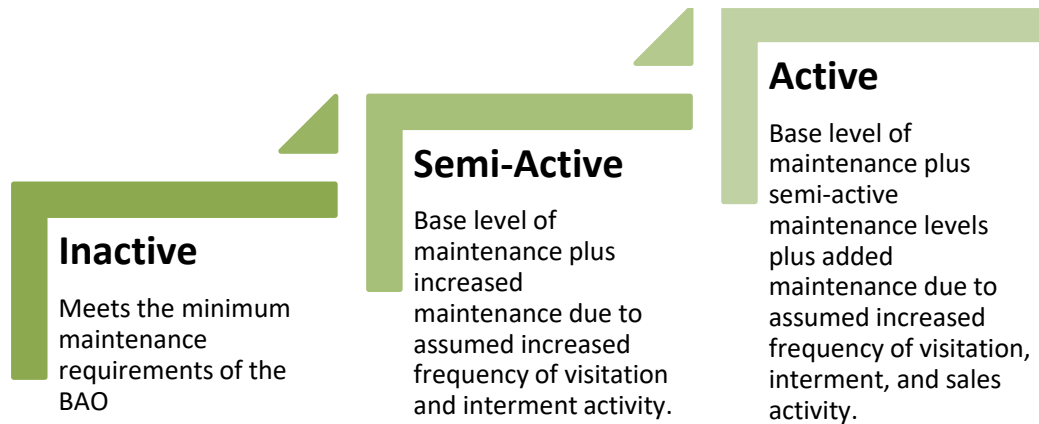
Assess and sort County cemeteries into operation categories to clarify the level of service required. Use the following categories to reflect visitation, interment, and sales activity accurately:



Categories are based primarily on business activity, meeting contractual obligations, and the anticipated number of visitors.

2 | MAINTENANCE SERVICE LEVELS

Develop maintenance categories that fit the cemetery categories.



Optional strategies for workshopping maintenance levels

- a) Develop demonstration areas in Oakwood and Delhi cemeteries to show the three maintenance levels to the public and stakeholders. Incorporate feedback and adjust maintenance practices within each level accordingly.
- b) Explore mixed maintenance levels in larger cemeteries based on interment and visitation activity. Some lesser-used areas of a cemetery could have fewer maintenance cycles and still be at an acceptable level of maintenance to the public.
- c) Explore alternative maintenance practices for rural cemeteries. Where county bylaws allow, consider using goats or sheep in a targeted rotational grazing program for turf/weed maintenance.

3 | QUALITY CONTROL: PUBLIC FEEDBACK

Through satisfaction surveys and community consultation, determine client/visitor satisfaction levels and the limits of acceptable change. This will be important for understanding how much a cemetery's maintenance level(s) can be adjusted.

4 | CEMETERY SYSTEM PLANNING & DEVELOPMENT

Complete a high-level assessment developable potential of cemetery expansion sites.

This is a high-level assessment to catalogue possible long-term acquisitions for cemetery expansion. Typically, when a cemetery is reaching its capacity limits, a 10 to 15-year process is needed to acquire suitable land for expansion or new cemetery development. Strategic land acquisition requires a long-term view to monitor suitable real estate opportunities.

The following criteria can be used in the high-level assessment:

- Proximity to a growth community.
- Available land (in cemetery or abutting property).
- Proximity to a maintenance hub & cost of servicing (mobilization).
- Known/evident site constraints (slope, soils, archaeology, land use suitability).
- Cost of acquisition.

5 | COST RECOVERY STRATEGY

Pricing, cost analysis, and decision-making must consider the cemetery system as a whole, not just individual cemetery sites or cemetery lots.

Where appropriate, move toward a cost recovery model of cemetery operation. For instance, when there is a request for a lot purchase at an inactive or semi-active cemetery, consider a policy that allows full cost recovery of services, including C&M Fund contribution.

Ensure a sufficient differential in pricing between Active, Semi-active, and Inactive cemeteries to create an incentive to choose interment at an active cemetery.

6.4 DEVELOPING NEW INVENTORY

The scope of the Master Plan focuses on the needs for the next 25 years and typically master plans are updated every 15 to 20 years to reflect changes in population and interment preferences. Long-term planning to equip a community with 100+ years of interment land is recommended by LEES to secure the resource for the future and to optimize future cost/revenue margins of future sales. Land can be difficult to source and understanding your needs will allow the County to take advantage of opportunities as they arise rather than being pressured by immediate need.

There are many unknowns within the Norfolk County cemetery system, and staff will need to continue assessing the capacity within the existing system and, more importantly, identify what capacity can be reasonably unlocked for cemetery use without exceeding the cost benefits of proceeding with land acquisition.

Below is a summary of the land needs based on the information available at the time of the assessment, followed by an overview of options to confirm and secure inventory: **Land Reclamation and Reallocation of Use, Land Acquisition and Expansion Development, Infill of Existing Property.**

Casket Burial	•25 years of remaining recorded sales inventory •4,500 additional lots would provide 100 years of sales •Inventory may be less due to feasibility of lands •Needs may increase with rise in Muslim residents •Spatial needs may increase with rise in Green Burial
Columbaria	•Only 5 years of inventory remaining •600+ niches to supply the next 25 years •2,280+ niches to supply the next 100 years •Demand is increasing as preferences shift to cremation •Minimal land needs, upfront capital investment needed
Cremation In-Ground Burial	•Oakwood bylaws accommodate but no current inventory •May reduce use of casket lots as family cremation plots •1 acre of land yields 2,000 cremation lots •Casket lots accommodate 6 urns, however rarely maximized •More efficient means of cremation burial

1 | LAND ASSESSMENT AND RECLAMATION

Assess Land for Interment Viability

Norfolk County should complete a review of all existing lands to assess the availability and feasibility of available lands within the existing cemeteries' property boundaries. Land should be reviewed for potential triggers under the Heritage Act related to the potential for cultural artifacts, including a Stage 1 Archaeological screening as required. We also recommend that operators conduct a test dig check for soil stability and potential water table issues.

When determining viability interment programming, the following guidelines should be considered:

- Determine soil suitability for interment types through test digs.
- Allocate areas with good soils and low archeological risk for casket lots and green burial.
- Select areas adjacent to natural features for Green Burial.
- Areas with problematic conditions can be programmed for uses that do not impact ground conditions such as memorialization, scattering, and multi-use spaces for families.

Reclamation Strategy – Unused Lots

Recognizing provincial law does not allow the unilateral reclamation of interment rights, another long-term option to increase cemetery land capacity is to reclaim abandoned, pre-purchased lots with the agreement of a rights holder. These are usually lots purchased from the cemetery several decades ago but whose owners have not had any contact with the County since the purchase. Candidate cemeteries for this strategy might include those in which there is minimal to no inventory or no room to expand.

The first step in a reclamation strategy would be for the County to identify and confirm the location of all existing sold, used, and unused lots.

The best practices surrounding this strategy include:

1. Identifying individuals and families who have purchased burial lots more than 50 years ago;
2. Attempting to find the last known interment rights holder;
3. Advertising in the local media (e.g., newspapers) to find them, then
4. When contacting the buyer or their family members is not successful and all reasonable efforts have been made, the lot may be considered unclaimed.

Once unused lots are found and re-acquired by the municipality, they can then be resold, typically at the current fair market value.

It is important to consider that just because a lot was sold 50 or more years ago does not necessarily indicate a lack of family interest. Thorough investigation and significant staff time may be required to determine if un-used lots are available; and this would need to be weighed against the cost of land acquisition.

This process can be very time-consuming and requires significant staff resources. This may be an activity that can be executed by volunteers with staff oversight. The County may have enough land capacity for the next 100+ years and not need to pursue a reclamation strategy. The need to commence a reclamation exercise should be confirmed through further assessment of land use viability.

2 | UNDERTAKE INFILL ON EXISTING PROPERTIES

At cemetery sites, opportunities often arise to expand capacity by developing open spaces within the property or in areas not historically designated for interments. Cemetery lands must remain designated for cemetery use to preserve these opportunities, as cemeteries are an essential service and it is increasingly difficult for municipalities to acquire new land for this use. Best use of underutilized cemetery lands can be achieved through a variety of ways, including:

- Developing unplanned open space.
- Infilling through closing low-traffic paths, driveways, and other underused utility areas to create additional interment space.
- Converting inventory types to align better with market demand.
- Strategically placing new in-ground lots with a smaller and more flexible land footprint, which may include small cremation lots and scattering gardens.
- Incorporating above-ground interment options like family vessels, columbaria, and memorial wall niches.

Before developing infill opportunities at an existing cemetery, a comprehensive site analysis should be carried out to assess the physical opportunities and constraints of the cemetery. This assessment should include the examination of cemetery lot maps, aerial photography, and thorough on-site inspections.

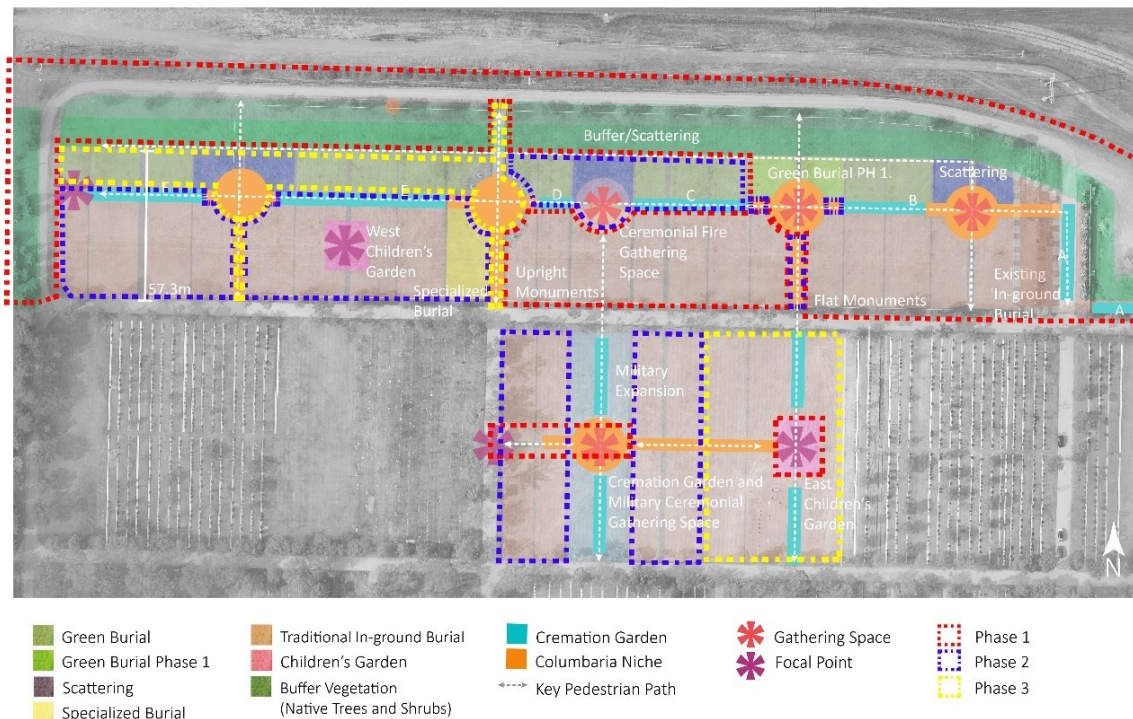


Figure 22: Example of expansion and infill plans at Woodlawn Cemetery in Saskatoon, SK.
Source: LEES+Associates

OAKWOOD CEMETERY DEVELOPMENT POTENTIAL

Oakwood Cemetery alone may have the capacity to serve much of Norfolk County's interment needs for the next 100 years, dependent on the land's viability for interment. It is also centrally located and popular with County residents. Oakwood currently hosts close to nine acres of potentially developable space. Within these developable areas, Oakwood could also host new, premium interment products that could help bring more revenue into the cemetery system. This section envisions big moves that Norfolk County should consider for Oakwood Cemetery.

Pine Woodland and Overlook

At nearly 25,600 square meters, this area is the largest single space for expansion within Oakwood Cemetery's existing boundaries. It is characterized by rolling hills, coniferous woodland, as well as scenic views on its northern edge, which looks out over a ravine that drops approximately eight meters. While this ravine is within cemetery lands, it has been filled over time, seasonally wet and drains the nearby landscape, complicating its potential for cemetery development. The Pine Woodland and Overlook section, however, still has potential to capitalize on its existing features to create new, meaningful cemetery areas.

In-ground casket burials in key locations here would be a premium product for the cemetery. The rolling hill character of this area may need to be modified for operational purposes but should not be flattened altogether as adds natural character to this area of the cemetery. As well, aspects of the Pine Woodland could be retained in part and kept naturalized. However this site is used, the products offered in this area should be determined carefully in order to meet the County's needs for the next 100 years.



Figure 23: Pine Woodland and Overlook section at Oakwood Cemetery. Source: Norfolk County

East Boundary Section

At 7,260 square meters, this strip of land has been maintained as a buffer, but it is of considerable size and could be used for a variety of interment types, subject to setbacks and further exploration of its conditions. The cemetery would also want to retain some of the existing vegetation to screen adjacent properties.

If further exploration reveals conditions appropriate for in-ground casket and/or cremation interments, this strip could be broken up into various “rooms” by retaining strips of existing vegetation or introducing new, planned plantings.



Figure 24: East Boundary Section at Oakwood Cemetery. North portion, left, and south portion. Source: Norfolk County

Section “I”

This previously-undeveloped area has just been approved and developed as a new columbaria site. Adding these facilities has diversified this use type to a new location on the property, making the cemetery more visually diverse and adding needed capacity for this popular interment type. It’s recommended that both community and family columbaria be considered as this site is further developed. Other amenities including seating and plantings should also be included to enhance the site’s aesthetics.



Figure 25: Section “I” at Oakwood Cemetery. Source: Norfolk County

Middle “H”

This unutilized space north of Oakwood’s entry has potential but carries unknowns. Cemetery staff have discovered buried, inert concrete and asphalt fill while conducting nearby interments and are unsure of its extents. It is recommended that Oakwood conduct exploratory digs to determine extent of buried material and whether this area, in part or in whole, is feasible for in-ground interments. Areas with extensive buried material could host columbaria or in-ground cremations. Depending on the depth of material, the land could also be built up, if feasible, to allow for in-ground casket interment and to add landscape interest.



Figure 26: Middle "H" section at Oakwood Cemetery. Source: Norfolk County

Division R Infill

These areas were left undeveloped to serve as access to the southern property, if it were to be used for cemetery expansion. With that property now sold and being developed, these spaces should be used for continued interments of the same character as the adjacent burials. If width of spaces doesn’t best fit the adjacent usage, consider family columbaria or premium cremation lots with garden plantings.



Figure 27: Three undeveloped areas within Division R at Oakwood Cemetery. Source: Norfolk County

Narrow Road Infill

Three small, narrow laneways exist within Oakwood Cemetery. They are too narrow for vehicular traffic and may have once been used for carriages. These could be kept as pedestrian paths and expanded, where possible, to link to other paths and roads. To make best use of this underutilized space, it's recommended to line the laneways with plantings and family columbaria. If it's not possible to extend these pathways, create a terminus at their ends with a place to sit and plantings, or a community columbarium. Full graves are not recommended for these types of locations due to uncertain ground conditions.

Figure 28: One of Oakwood Cemetery's unused narrow roads. Source: Norfolk County



Driveway Islands

LEES+Associates typically recommends avoiding placing interment spaces on roadway islands, as the parking and safe pedestrian crossing requirements for interment spaces would create several complications, and the character of these spaces do not lend themselves well to being dignified places of rest. Depending on the site context, these spaces could host decorative plantings, specimen trees, or rain gardens if there are needs for drainage in the surrounding area.



Figure 29: A driveway island at Oakwood Cemetery. Source: Norfolk County

Cremation Section

This area has been designated as a cremation section but no interments have taken place. Cemetery staff have raised issues with its layout, lot pricing, and that the existing cemetery bylaw does not support its use. While cemetery staff have recommended that another use be specified for this section, there is a need for more cremation interment options at Oakwood Cemetery. A realignment/re-survey of the area could enable this. Alternately, this section could be re-envisioned; such as for a cremation garden, which would host multiple types of cremation interments: in-ground interment, a plaza with community columbaria, smaller family columbaria, and/or a scattering garden. The visual appeal of this cemetery feature would enhance the adjacent historic cemetery entry.



Figure 30: The unused Cremation Section at Oakwood Cemetery. Source: Norfolk County

3 | LAND ACQUISITION & EXPANSION DEVELOPMENT

Municipalities must set aside cemetery lands sufficient for future needs as soon as possible. Once land is developed for housing or commercial purposes, it will not likely again be available for cemetery purposes. It is important as well to set aside space for expansion around existing cemeteries, as it is much more efficient operationally and administratively, as well as pleasing aesthetically, to have more centralized cemetery spaces than small, far-flung cemeteries.

At Oakwood Cemetery, as well as other active cemeteries that come under its purview, Norfolk County is strongly encouraged to proactively examine, consider and plan for short- and long-term acquisition opportunities in the surrounding area.

Using Oakwood Cemetery as an example, the map below is intended to show the types and proximity of lands that a municipality might consider for expansion planning. It should be emphasized that this is an exercise/example and there is no intent here to target specific properties.



Monitor for Potential Acquisition: School currently relying on portable classrooms for additional space. If its future needs necessitate relocation, Norfolk County should acquire site for cemetery expansion space. Opportunities may also arise at adjacent industrial property and nearby golf course.



Undeveloped Land: It is recommended that Norfolk County earmark the County-owned woodland properties here for future cemetery expansion. A trail runs through this property and it has varying topography and wet areas. It would be suitable for cremation and scattering while retaining existing character.

Figure 31: An example of a planning exercise at Oakwood Cemetery identifying the size, type, and proximity of lands to be considered for future acquisition and incorporation into the cemetery system.
Source: LEES+Associates

6.5 PROPOSED IMPLEMENTATION APPROACH

	Action	Reference
Short term	Form internal cemetery working group, with members from cemetery management, administration, operations, and knowledgeable staff.	Section 2.3
	Organize cemeteries into active, semi-active, and inactive categories.	Sections 2.3, 6.2
	Identify and implement critical maintenance tasks at cemeteries.	Section 2.3
	Make one-time increase to cemetery fees and non-resident rate, as outlined in this Master Plan.	Section 4.5, Appendix B
	Introduce a spectrum of columbaria niche pricing in the County's price list, with higher prices for more attractive niche positions, such as higher levels of columbaria.	Section 4.5
	Simplify County's price list by using same rates at all its cemeteries.	Section 4.5
	Obtain contractors' quote(s) for operations and maintenance at cemeteries and compare with cost to do internally.	Section 5.5
	Undertake an in-depth operations cost analysis to identify improvements and efficiencies to be gained that would reduce costs.	Section 5.5
	Develop and implement a marketing plan to increase community awareness of active cemeteries. Invest in events at the cemeteries to increase community engagement;	Section 5.5

Medium term	Take actions to bolster Care and Maintenance Fund.	Sections 5.3, 5.4
	Introduce new products and services to better serve community, increase market share and revenue.	Section 5.5, Appendix A
	Having categorized cemeteries into active, semi-active, and inactive, implement new operations and maintenance strategies accordingly.	Sections 2.3, 6.2
	Once operations and maintenance needs are identified, ensure staffing levels and facilities are appropriate.	Section 6.1
	Monitor and evaluate the community members' response to the new prices, offerings, and other changes implemented under this plan.	Section 5.5
	Undertake a complete Financial Plan that includes an in-depth assessment of Norfolk Cemeteries' revenue and expense sources, current financial data management practices, and future projections for Norfolk Cemeteries' operating financials and C&MFs.	Section 5.5
	Transition to digital records-keeping system and migrate existing records to new system.	Section 5.5
	Evaluate land around prominent cemeteries, such as Oakwood, for potential acquisition and development. If possible, begin process of acquisition.	Section 6.3
	Conduct detailed inventories of active, popular cemeteries and identify areas for infill. Where infill is easily developed, develop it for interment.	Section 6.3
Long term	Conduct detailed inventories of semi-active and inactive cemeteries to identify areas for infill and reactivation, if public interest warrants.	Section 6.3
	Reduce active operations in cemeteries where decreasing interments warrant it.	Sections 2.3, 6.2
	Acquire and develop new cemetery lands, if necessary and where available.	Section 6.3
	Continually re-evaluate fees based on needs, comparable cemetery pricing, and inflation.	Chapter 5

7 APPENDICES

7.1 APPENDIX A – PRODUCTS AND SERVICES OPTIONS

7.2 APPENDIX B – PRICE BENCHMARKING

7.3 APPENDIX C – C&MF PROVINCIAL REQUIREMENTS

7.4 APPENDIX D - GLOSSARY



Appendix A

Products + Service Options

APPENDIX A - PRODUCT + SERVICES OPTIONS

Green Burial

Green burial is an emerging trend at cemeteries worldwide. The philosophy of having a lighter touch on the environment resonates with many populations' aims to live in a way that has less impact on the planet, and that is more closely related to natural processes.

Green burial is also known as "natural burial," "country burial," or "woodland burial," and is defined as an in-ground burial with:

- No embalming;
- A fully biodegradable casket or shroud;
- No use of grave liners or concrete vaults;
- A form of habitat restoration of the gravesite, such as planting with native species; and
- A communal marker, no marker, or a simple marker made of local and natural materials.

While green burial is often described as a new practice, it is a living tradition that stretches back further than contemporary in-ground burial techniques, such as embalming. The Jewish, Muslim, and Baha'i communities have traditionally interred the deceased according to green burial principles. Most recently, the Catholic Church has begun to actively embrace green burial, determining that the tenets of green burial align well with its core beliefs and practices.

The Canadian-based Green Burial Society of Canada (GBSC) (<http://www.greenburialcanada.ca/>) is a non-profit organization that offers a certification program to qualifying service providers. Its website lists the Canadian cemeteries currently offering green burial and offers some examples. Refer to the GBSC website for information on registration.

There are currently, two certified providers in Ontario. Fairview Cemetery in Niagara Falls and Glenwood Cemetery in Picton have been certified by the GBSC. Other cemeteries operate without the certification.

The greatest challenge to green burial is public awareness and industry education. While



Example of green burial.

growing in popularity, green burial is not yet a wide-spread option across Canada, and community members lack awareness of what comprises the practice.

Without an understanding of green burial principles and practices, many families, funeral, and cemetery service providers may perceive health and safety concerns, environmental protection, and reasonable cost as not achievable.

APPENDIX A - PRODUCT + SERVICES OPTIONS

Much work has been put into researching these issues and many concerns have been dispelled. Organizations like the GBSC can provide information on these issues.

Green burial is not a discount option, but a different service catering to a distinct population, with distinct values. These lots should be just as valued, and valuable, as traditional burial grounds and for that reason should be priced commensurate with other full-depth burial options.

Over the long term, maintenance costs for green burial can be less than more traditional casket burials that are associated with mown lawns and irrigation. The habitat restoration practice within green burial areas requires less maintenance after plant establishment and provides more ecological services – such as helping bolster biodiversity – to the area.

Committing to providing green burial offers a marketing opportunity for the County and could increase connections between the community and the cemetery. Media and social network sites are especially attuned to stories about green burial, both for its novelty and for its associations with sustainable practices.

Double Depth Burial

Double depth burial is common in Canadian municipal cemeteries, allowing for cemeteries to maximize their interment capacity and potential service revenue as well as giving residents more options for interments.

Ideally, a cemetery would allow double depth casket burial for the owner/operator to maximize their interment capacity and potential service revenue. However, double depth burials can pose operational challenges. Rocky soils, seasonal saturation, and safety concerns necessitate the use of vaults and specialized equipment for double depth burials in cemeteries. These measures address difficulties in digging to extra depth and ensure proper accommodation for two casket burials.

Family Vessels

Family vessels are large urns designed for placement at key locations, along pathways, and in cremation gardens. Each vessel accommodates up to 4 hard urns, 10 soft urns, or 15 co-mingled remains.

Each vessel is owned by the cemetery, which sells families a right-of-interment for its exclusive use. Since these vessels are a new offering in North America, their introduction would require marketing to increase community awareness. As such, family vessels should be installed in phases, beginning with one or two units placed in the cemetery.

Family vessels are offered at several Canadian and American cemeteries. Rates range from \$6,000 to \$13,000 each, depending on their size and location in the cemetery. Services for placing a nested urn or comingling remains within the vessel are typically \$200 for each interment.

Like columbaria, family vessels preserve interment land capacity because they take little space and can often be placed in areas unusable for other types of interment.



Traditional burial space can be maximized through double depth interments.

APPENDIX A - PRODUCT + SERVICES OPTIONS

Scattering Gardens/Ossuary

Scattering gardens are attractive natural or ornamental areas that offer a place for the scattering of cremated remains.

This offering is a flexible and efficient use of land for interment capacity. A common feature at Canadian cemeteries, scattering gardens offer families the option to disburse all or a portion of cremated remains in a peaceful, sacred space.

Cremated remains are alkaline and salty, so limiting their spread in the scattering garden extends the life of plants in the area. One common method to achieve this is by using an in-ground or above-ground ossuary placed in the garden, where a ceremonial scattering of some remains occurs, and the rest are stored.

An ossuary is a container for holding the cremated remains of multiple individuals.

Mausolea

Mausolea are external free-standing buildings constructed as a monument enclosing the interment space or burial chamber of a deceased person or people. Religious



Example of scattering garden.

cemeteries commonly construct substantial mausoleums throughout Canada, which often include crypts, niches, and a chapel.

A mausoleum is a premium interment option. It is best to establish community interest for this expensive option before introducing them to a cemetery. These are usually introduced targeted to large, specific ethnic and religious markets (such as the Italian Catholic communities) that would support their design and construction.

Family Estate Plots

Family estate burial plots vary significantly in the number and type of interments permitted, and in size and features, among cemeteries across Canada.

There are no bereavement industry regulations, limits, or standards governing the minimum or maximum size of a family estate. The permitted dimensions of a family estate are typically established by the operator of the cemetery and added to the municipal Cemetery Bylaw.

Traditional in-ground burial family estates typically permit the interment of cremated remains, in addition to full-body remains.



Example of Mausolea.

APPENDIX A - PRODUCT + SERVICES OPTIONS

These estates typically include a combination of interment spaces and landscape features such as the following mix of offerings:

- Two double-depth lawn crypts, (four traditional in-ground burials);
- Cremation lots (up to 16 cremation interments);
- Marker foundation;
- Granite memorial bench;
- Planting beds, and
- Fencing, with an arched gate feature that includes bronze nameplates.

The premium price of a family estate typically reflects the associated development cost and ongoing maintenance of the landscape features included.

Family estates are a premium offering that is common across the country, but uncommon in small, rural communities.



Cremation Garden with family columbaria.

Columbaria

Columbaria niches are growing in popularity with the rising cremation rate with North American customers.

Columbaria construction costs (and their relative niche price to the customer) vary widely, depending on size, design details, and associated amenities placed in the adjacent landscape. All installations typically have a high return on investment (approximately 200% or more) and provide a growing source of revenue, due to the rising demand for niches. They also have a relatively low cost of interment. It takes significantly less time and cost to place an urn within a niche (known as “inurnment”) than to inter an urn within an in-ground burial lot.

Columbaria also preserve interment land capacity, as they take little space, and can be placed in areas unusable for other types of interment.

In addition, columbaria are less constrained by challenging seasonal weather and frozen landscape conditions.

Canadian cemeteries commonly offer both standard columbaria, as well as family columbaria.



Example of Family Estate.

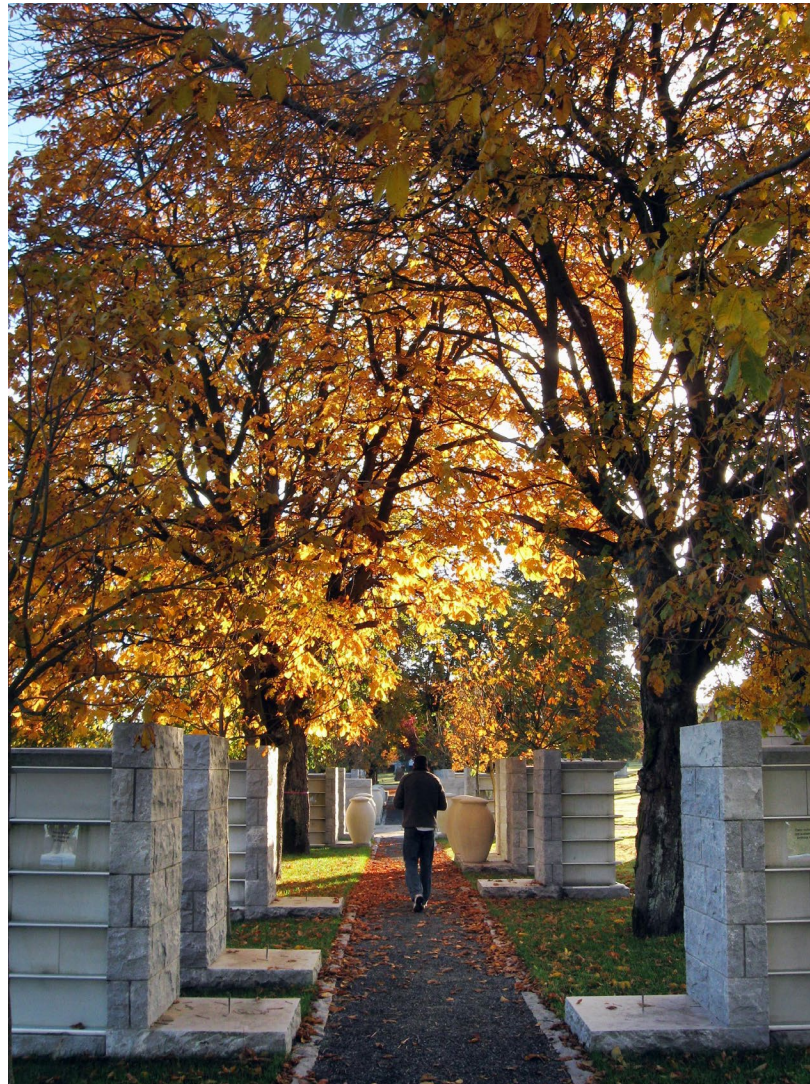
APPENDIX A - PRODUCT + SERVICES OPTIONS

Standard columbaria are above-ground structures or walls with many recessed niches, which accommodate cremation urns. Sometimes called “community columbaria,” standard columbaria will house the cremated remains from multiple families. Up to two interments are typically allowed in one standard columbarium niche.

Family columbaria vary significantly in size, price, and design. A family columbarium is essentially the same as a standard columbarium, except they are scaled for a single family, which holds the exclusive right-of-interment to all the niches or other features. All of its memorialization is dedicated to members of that family. Custom features can be added to meet personal family tastes, customs, and religious practices as well as accommodate cemetery standards. Personalized engraving can be added to the roofline, sidewalls, and doors for added detail.

When a family columbarium is requested, the family is required to purchase the number of lots the columbaria will be placed on. There are not usually designated spots in a cemetery for family columbaria. Cemetery staff typically work with the families in choosing an appropriate location.

Family columbaria are a premium offering that is common across the country, but uncommon in small, rural communities. None of the comparable communities in the region that were studied in this plan, offer family columbaria niches to their residents.



Example of community columbaria.

APPENDIX A - PRODUCT + SERVICES OPTIONS

Memorialization Without Interment

Memorialization can occur with or without interment at a cemetery. With increasingly mobile families, many people are choosing not to inter the cremated remains of their loved ones in a cemetery; however, they are still interested in memorializing them in some way in communities to which they feel attachment.

There is a possible market for the cemetery to sell a range of options for commemoration without interment, particularly for people who may have lived in the area and have family members there, but who are interred elsewhere.

A diverse range of memorialization options are typically greatly appreciated by community members. However, it is also very important for cemeteries to develop an operational plan to ensure their costs of supply, installation and ongoing care are fully supported. Examples of memorialization products include:

- Memorial walls;
- Memorial trees;
- Memorial benches;
- Memorial boulders, or memorial pebble gardens;
- Plaques on stone pillars, statuary, niche doors, and
- Communal living memorial areas with plantings, shrubs, and flower beds.



Example of memorial wall.



Example of memorial boulder.



Example of memorial bench plaque.



Example of memorial rock garden.

APPENDIX A - PRODUCT + SERVICES OPTIONS

Additional Support Services + Fees

Canadian cemeteries often offer a wide range of additional fee-based support services. These services vary widely across different municipal cemeteries

- Cornerstones;
- Legal inquiries;
- Sunday services;
- Holiday services;
- Urns & urn vaults;
- Pallbearer services;
- Monument cleaning;
- Delayed burial storage;
- Concurrent service fee;
- Surrender and sell backs;
- Oversized liners & caskets;
- Flower placement service;
- Concrete slab for lanterns;
- Curbing & lifting of curbing;
- Memorial/marker provision;
- Memorial boulders;
- Marker repair and modification;
- Vases and vase installation.
- Genealogical research and retrieval of records from archives;
- Removal/replacement/sealing of crypt face plates;
- Interment cancellation;
- Winter grave-care services (e.g., snow shovelling);
- Tent, chairs, and lowering device rental fee for graveside services;
- Urgent accommodation fee for unplanned services;
- Bronze marker order/handling fee/installations;
- Handling & placing of funeral home-supplied liners;
- Making arrangements for monuments and foundations;
- Administration, Registration, and Cancellation services.

In deciding which new service fees to add, it is important to consider that too many additional charges can make people feel that they are being overcharged for small tasks or standard items. This can lead to community member resentment and disengagement.

In addition to considering the impact on residents, new support service fees should be balanced with the anticipated resourcing and administrative costs to implement and maintain those services. Several of these services could be implemented easily and with little to no cost to the municipality.



Appendix B

Price Benchmarking

APPENDIX B - PRICE BENCHMARKING

Norfolk County - 2024 Rates Comparison																					
Item	Norfolk County Resident	Norfolk County Non-Resident	NR%	Tillsonburg Resident	Tillsonburg Non-Resident	NR%	Haldimand Resident	Haldimand Non-Resident	NR%	Elgin County Malahide Resident	Elgin County Malahide Non-Resident	NR %	Perth County North Perth Resident	Perth County North Perth Non-Resident	NR %	Brantford Resident	Brantford Non-Resident	NR %	Average Resident	Average Non-Resident	
Population 2021 - National Census		67,490			18,615			49,216			94,752			81,565			103,999				
Right of interment for Lots + Niches (before taxes)																					
Adult Casket Lot* - MIN	\$ 776.00	\$ 1,048.00	35%	\$ 844.00	\$ 844.00	NA	\$ 1,065.00	\$ 1,597.50	50%	\$ 1,120.00	\$ 1,120.00	NA	\$ 1,299.00	\$ 1,299.00	NA	\$ 981.02	\$ 981.02	NA	\$1,062	\$1,168	
Adult Casket Lot* - MAX	\$ 1,185.00	\$ 1,600.00	35%	\$ 844.00	\$ 844.00	NA	\$ 1,407.00	\$ 2,110.50	50%	\$ 1,120.00	\$ 1,120.00	NA	\$ 2,271.00	\$ 2,271.00	NA	\$ 2,029.39	\$ 2,029.39	NA	\$1,534	\$1,675	
Infant Lot (<2 yrs)	\$ 201.00	\$ 201.00	0%	\$ 225.00	\$ 225.00	NA	\$ 606.00	\$ 909.00	50%	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$416	\$567	
Child Lot (>2 yrs)	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 642.12	\$ 642.12	NA	\$642	\$642	
Cremation Lot - MIN	\$ 476.00	\$ 643.00	35%	\$ 633.00	\$ 560.18	NA	\$ 673.00	\$ 1,009.50	50%	NA	NA	NA	\$ 895.00	\$ 895.00	NA	\$ 740.85	\$ 740.85	NA	\$735	\$801	
Cremation Lot - MAX	\$ 476.00	\$ 643.00	35%	\$ 633.00	\$ 633.00	NA	\$ 673.00	\$ 1,009.50	50%	NA	NA	NA	\$ 895.00	\$ 895.00	NA	\$ 971.23	\$ 971.23	NA	\$793	\$877	
Columbaria Niche - MIN	\$ 2,384.00	\$ 3,218.00	35%	\$ 1,687.00	\$ 1,687.00	NA	\$ 542.00	\$ 813.00	50%	NA	NA	NA	\$ 2,273.00	\$ 2,273.00	NA	\$ 2,614.27	\$ 2,614.27	NA	\$1,779	\$1,847	
Columbarium Niche - MAX	\$ 2,384.00	\$ 3,218.00	35%	\$ 2,056.00	\$ 2,056.00	NA	\$ 542.00	\$ 813.00	50%	NA	NA	NA	\$ 2,859.00	\$ 2,859.00	NA	\$ 2,939.59	\$ 2,939.59	NA	\$2,099	\$2,167	
Mausolea Crypts - MIN	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 3,057.08	\$ 3,057.08	NA	\$3,057	\$3,057	
Mausolea Crypts - MAX	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 4,224.34	\$ 4,224.34	NA	\$4,224	\$4,224	
Family Estate - Multi-Grave Plot (Full Burial) - MIN	NA	NA	NA	NA	NA	NA	\$ 2,457.00	\$ 3,685.50	50%	NA	NA	NA	NA	NA	NA	\$ 3,217.79	\$ 3,217.79	NA	\$2,837	\$3,452	
Family Estate - Multi-Grave Plot (Full Burial) - MAX	NA	NA	NA	NA	NA	NA	\$ 5,475.00	\$ 8,212.50	50%	NA	NA	NA	NA	NA	NA	\$10,795.58	\$ 10,795.58	NA	\$8,135	\$9,504	
Veterans	\$ 335.00	\$ 335.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 423.91	\$ 423.91	NA	\$424	\$424	
Family Columbaria	NA	NA	NA	\$ 10,400.00	\$ 10,400.00	NA	NA	NA	NA	NA	NA	NA	\$ 2,859.00	\$ 2,859.00	NA	NA	NA	NA	\$6,630	\$6,630	
Norfolk County - 2024 Rates Comparison																					
Item	Norfolk County Resident	Norfolk County Non-Resident	NR%	Tillsonburg Resident	Tillsonburg Non-Resident	NR%	Haldimand Resident	Haldimand Non-Resident	NR%	Elgin County Malahide Resident	Elgin County Malahide Non-Resident	NR %	Perth County North Perth Resident	Perth County North Perth Non-Resident	NR %	Brantford Resident	Brantford Non-Resident	NR %	Average Resident	Average Non-Resident	
Population 2021 - National Census		67,490			18,615			49,216			94,752			81,565			103,999				
Memorialization + Other Fees (before taxes)																					
Setting Corner Markers	NA	NA	NA	NA	NA	NA	\$ 43.00	\$ 43.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$43	\$43
Marker Setting Fee	NA	NA	NA	NA	NA	NA	\$ 131.00	\$ 131.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$131	\$131
Memorial Wall Plaque	\$ 762.00	\$ 1,029.00	35%	\$ 750.00	\$ 750.00	NA	NA	NA	NA	NA	NA	NA	\$ 898.00	\$ 898.00	NA	NA	NA	NA	NA	\$824	\$824
Memorial Bench with Plaque	NA	NA	NA	\$ 3,380.00	\$ 3,380.00	NA	NA	NA	NA	NA	NA	NA	\$ 1,919.00	\$ 1,919.00	NA	\$ 2,100.15	\$ 2,100.15	NA	\$2,466	\$2,466	
Memorial Arbor/Tree with Plaque	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 3,198.00	\$ 3,198.00	NA	\$ 1,127.05	\$ 1,127.05	NA	\$2,163	\$2,163	
Locate and Inspection Fee	\$ 67.00	\$ 90.00	34%	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Sodding	\$ 133.00	\$ 180.00	35%	NA	NSA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
Burial and Cremation License Recovery Fee	NA	NA	NA	\$ 30.00	\$ 30.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$30	\$30
Transfer, Resale, Reissue of Inter Rights Certificate	\$ 45.00	\$ 61.00	36%	\$ 48.00	\$ 48.00	NA	\$ 64.00	\$ 64.00	NA	\$ 120.00	\$ 120.00	NA	\$ 207.00	\$ 207.00	NA	\$ 72.67	\$ 72.67	NA	\$102	\$102	
Geneology / Family Search Requests	NA	NA	NA	\$32 / 1/2 hr	\$32 / 1/2 hr	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$13.47/ name	\$13.47/ name	NA	special	special	
Search / Re-issue IRC	\$ 82.00	\$ 111.00	35%	\$ 45.00	\$ 45.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 34.94	\$ 34.94	NA	\$40	\$40	
Foundation Surcharge	\$ 414.00	\$ 414.00	NA	\$32.77 / ft3	\$32.77 / ft3	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$32.77 / ft3	\$32.77 / ft3
Extra Depth	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 326.00	\$ 326.00	NA	NA	NA	NA	NA	\$326	\$326
Late Arrival	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 311.00	\$ 311.00	NA	NA	NA	NA	NA	\$311	\$311
Weekends Surcharge - MIN	\$ 338.00	\$ 338.00	NA	\$ 296.94	\$ 296.94	NA	\$ 205.00	\$ 205.00	NA	\$ 200.00	\$ 200.00	NA	\$ 397.00	\$ 397.00	NA	\$ 95.58	\$ 95.58	NA	\$239	\$239	
Weekend Surcharge - MAX	\$ 635.00	\$ 635.00	NA	\$ 1,134.44	\$ 1,134.44	NA	\$ 392.00	\$ 392.00	NA	\$ 200.00	\$ 200.00	NA	\$ 810.00	\$ 810.00	NA	\$ 557.12	\$ 557.12	NA	\$619	\$619	
Holiday Surcharge - MIN	\$ 681.00	\$ 681.00	NA	\$ 356.32	\$ 356.32	NA	\$ 205.00	\$ 205.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$281	\$281
Holiday Surcharge - MAX	\$ 681.00	\$ 681.00	NA	\$ 1,361.32	\$ 1,361.32	NA	\$ 392.00	\$ 392.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$877	\$877
After Weekday Hrs Surcharge - MIN	\$ 172.00	\$ 172.00	NA	\$ 356.32	\$ 356.32	NA	NA	NA	NA	\$ 175.00	\$ 175.00	NA	NA	NA	NA	\$ 209.89	\$ 209.89	NA	\$247	\$247	
After Weekday Hrs Surcharge - MAX	\$ 257.00	\$ 257.00	NA	\$ 1,361.32	\$ 1,361.32	NA	NA	NA	NA	\$ 175.00	\$ 175.00	NA	NA	NA	NA	\$ 209.89	\$ 209.89	NA	\$582	\$582	
Accessory Installation	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

APPENDIX B - PRICE BENCHMARKING

Norfolk County - 2024 Rates Comparison																				
Item	Norfolk County Resident	Norfolk County Non-Resident	NR%	Tillsonburg Resident	Tillsonburg Non-Resident	NR%	Haldimand Resident	Haldimand Non-Resident	NR%	Elgin County Malahide Resident	Elgin County Malahide Non-Resident	NR %	Perth County North Perth Resident	Perth County North Perth Non-Resident	NR %	Brantford Resident	Brantford Non-Resident	NR %	Average Resident	Average Non-Resident
Population 2016 - National Census		67,490			18,615			49,216			94,752			81,565			103,999			
Opening / Closing Services (before taxes)																				
Adult Burial - Single Depth - Summer	\$ 928.00	\$ 1,253.00	35%	\$ 907.55	\$ 907.55	NA	\$ 958.00	\$ 958.00	NA	\$ 900.00	\$ 900.00	NA	\$ 827.00	\$ 827.00	NA	\$ 1,210.59	\$ 1,210.59	NA	\$961	\$961
Adult Burial - Single Depth - Winter	\$ 1,032.00	\$ 1,393.00	35%	\$ 907.55	\$ 907.55	NA	\$ 958.00	\$ 958.00	NA	\$ 900.00	\$ 900.00	NA	\$ 2,288.00	\$ 2,288.00	NA	\$ 1,210.59	\$ 1,210.59	NA	\$1,253	\$1,253
Infant Burial (<2 yrs)	NA	NA	NA	\$ 300.00	\$ 300.00	NA	\$ 328.00	\$ 328.00	NA	NA	NA	NA	\$ 263.00	\$ 263.00	NA	\$ 411.39	\$ 411.39	NA	\$326	\$326
Child Burial (>2 yrs) - Summer	\$ 257.00	\$ 257.00	NA	\$ 343.55	\$ 343.55	NA	\$ 512.00	\$ 512.00	NA	\$ 600.00	\$ 600.00	NA	NA	NA	NA	\$ 696.34	\$ 696.34	NA	\$538	\$538
Child Burial (>2 yrs) - Winter	\$ 315.00	\$ 315.00	NA	\$ 343.55	\$ 343.55	NA	\$ 512.00	\$ 512.00	NA	\$ 600.00	\$ 600.00	NA	NA	NA	NA	\$ 696.34	\$ 696.34	NA	\$538	\$538
Cremated Remains Burial - Summer	\$ 425.00	\$ 574.00	35%	\$ 396.55	\$ 396.55	NA	\$ 328.00	\$ 328.00	NA	\$ 425.00	\$ 425.00	NA	\$ 425.00	\$ 425.00	NA	\$ 408.62	\$ 408.62	NA	\$397	\$397
Cremated Remains Burial - Winter	\$ 476.00	\$ 643.00	35%	\$ 396.55	\$ 396.55	NA	\$ 328.00	\$ 328.00	NA	\$ 425.00	\$ 425.00	NA	\$ 1,886.00	\$ 1,886.00	NA	\$ 408.62	\$ 408.62	NA	\$689	\$689
Cremated Remains - Infant/Child	NA	NA	NA	\$ 237.55	\$ 237.55	NA	\$ 328.00	\$ 328.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$283	\$283
Columbaria Niche Inurnment	\$ 252.00	\$ 340.00	35%	\$ 237.55	\$ 237.55	NA	\$ 328.00	\$ 328.00	NA	NA	NA	NA	\$ 263.00	\$ 263.00	NA	\$ 199.97	\$ 199.97	NA	\$257	\$257
Mausolea - Entombment - MIN	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 1,154.16	\$ 1,154.16	NA	\$1,154	\$1,154
Mausolea - Entombment - MAX	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 1,376.70	\$ 1,376.70	NA	\$1,377	\$1,377
Disinterment - Adult Casket - MIN	\$ 1,243.00	\$ 1,678.00	35%	\$ 1,486.00	\$ 1,486.00	NA	\$ 1,442.00	\$ 1,442.00	NA	\$ 1,050.00	\$ 1,050.00	NA	\$ 3,090.00	\$ 3,090.00	NA	\$ 1,743.55	\$ 1,743.55	NA	\$1,762	\$1,762
Disinterment - Adult Casket - MAX	\$ 1,584.00	\$ 2,138.00	35%	\$ 2,201.00	\$ 2,201.00	NA	\$ 2,397.00	\$ 2,397.00	NA	\$ 1,050.00	\$ 1,050.00	NA	\$ 3,090.00	\$ 3,090.00	NA	\$ 1,743.55	\$ 1,743.55	NA	\$2,096	\$2,096
Disinterment - Child Casket	NA	NA	NA	\$ 791.00	\$ 791.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 1,175.11	\$ 1,175.11	NA	\$983	\$983
Disinterment - Infant Casket	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 850.90	\$ 850.90	NA	\$851	\$851
Disinterment - Crypt Casket - MIN	NA	NA	NA	MA	MA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 1,154.16	\$ 1,154.16	NA	\$1,154	\$1,154
Disinterment - Crypt Casket - MAX	NA	NA	NA	MA	MA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$ 1,376.70	\$ 1,373.70	NA	\$1,377	\$1,374
Disinterment - Cremated Remains Plot	\$ 492.00	\$ 664.00	35%	\$ 475.00	\$ 475.00	NA	\$ 589.00	\$ 589.00	NA	\$ 700.00	\$ 700.00	NA	\$ 410.00	\$ 410.00	NA	\$ 439.14	\$ 439.14	NA	\$523	\$523
Disinterment - Cremated Remains - Child/Infant	NA	NA	NA	\$ 317.00	\$ 317.00	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	\$317	\$317
Disinterment - Cremated Remains Niche	\$ 257.00	\$ 347.00	35%	NA	NA	NA	\$ 589.00	\$ 589.00	NA	NA	NA	NA	\$ 249.00	\$ 249.00	NA	\$ 439.14	\$ 439.14	NA	\$426	\$426



Appendix C

Provincial Requirements

APPENDIX C - PROVINCIAL REQUIREMENTS

Provincial legislation intends for the interest generated by a Care and Maintenance Fund (C&MF) to help offset the effect of inflation, and therefore provide the required monies for what will eventually be more expensive site to maintain in the future.

Ontario Regulations made under the Act, Division G, Care and Maintenance Funds and Accounts, Sections 166 and 168, dictate the following provincially mandated annual contributions as follows:

166. (1) for the purposes of subsections 53 (9) and (10) of the Act, the prescribed amount is as follows:

1. \$0, in the case of a flat marker measuring less than 1,116.13 square centimetres (173 square inches).
2. \$100, in the case of a flat marker measuring at least 1,116.13 square centimetres (173 square inches).
3. \$200, in the case of an upright marker measuring 1.22 metres (four feet) or less in height and 1.22 metres (four feet) or less in length, including the base.
4. \$400, in the case of an upright marker measuring more than 1.22 metres (four feet) in either height or length, including the base. O. Reg. 30/11, s. 166 (1).

And,

168. The following amounts are prescribed as the amounts that a cemetery operator is required to pay into a care and maintenance fund or account for the purposes of subsection 53 (14) of the Act:

1. In the case of an in-ground grave that is 2.23 square metres or 24 square feet or larger, the greatest of 40 percent of the price of the interment rights as set out on the price list and \$290.
2. In the case of an in-ground grave that is smaller than 2.23 square metres or 24 square feet, the greatest of 40 percent of the price of the interment rights as set out in the price list and \$175.
3. In the case of a tomb, crypt, or compartment in a public mausoleum, the greatest of 20 per cent of the price of the interment rights as set out on the price list and \$830.
4. In the case of a niche or compartment in a public columbarium, the greatest of 15 per cent of the price of the interment rights as set out on the price list and \$165.
5. In the case of a scattering ground for which there will be only one scattering rights holder, the greatest of 40 per cent of the price of the scattering rights as set out on the price list and \$115.
6. In the case of a scattering ground for which there will be more than one scattering rights holder, the greatest of 15 per cent of the price of the scattering rights as set out on the price list and \$30.
7. In the case of a scattering ground for which there will be no scattering rights holders, \$25. O. Reg. 30/11, s. 168.

The Minister shall conduct a review of the amounts prescribed for the purposes of Section 53 of the Act at least once every five years. O. Reg. 258/21, s. 11. 11.



Appendix D

Glossary

APPENDIX D - GLOSSARY

AT-NEED: Refers to the time of purchase of funeral or cemetery services at the time of or immediately following death.

AQUAMATION: The reduction of human remains to bone fragments through a process based on alkaline hydrolysis. Also known as biocremation, flameless cremation, or water cremation.

BURIAL: The placement of human remains in a grave.

BURIAL PERMIT: A legal document issued by a regulatory authority authorizing the final disposition of human remains

BURIAL SHROUD: A cloth or sheet in which a body is wrapped for burial. For Green Burial, a shroud is made of natural fibre, either plain or decorated in organic plant-based dyes.

BYLAWS: The written regulations, rules or laws governing the organization, management and operation of a cemetery, mausoleum, columbarium or crematorium.

CAPACITY: The maximum cemetery inventory a site can potentially contain within its surveyed limits after all unused land has been developed.

CASKET: A rigid container usually constructed of wood, metal or similar material, ornamented and lined with fabric, designed to hold human remains.

CEMETERY SERVICES: The disposition of human remains in a cemetery and includes the supply of goods incidental to the provision of such service but does not include the sale of lots.

COLUMBARIUM: A structure, building, an area in a structure or building that contains niches for the inurnment of cremated remains. Columbaria may be classified as Individual, Family, or Community based on the number of niches and how they are sold. Plural: COLUMBARIA.

COMMEMORATION: The act of remembering and honouring the memory of a person, people, or significant event through ceremony, services, symbolic gestures, rituals, or built memorials.

COMMINGLING: The mixing of the cremated remains of more than one person.

CONCRETE BURIAL VAULT: A protective, sealable outer receptacle into which a casket or urn is placed, designed to keep out soil or other elements from the gravesite. See also LAWN CRYPT.

CONCRETE LINER: Similar to a concrete burial vault, however, it only covers the top and sides of the casket and is not sealable.

CREMATION: The reduction of human remains to bone fragments through the application of flame and intense heat; this may include the repositioning or movement of the bones during the process to ensure complete cremation. The bone fragments are processed into smaller pieces, manually or mechanically, after they are removed from the cremation chamber.

CREMATION LOT: A space used, or intended to be used, specifically for the interment of cremated remains. Typically, cremation lots are smaller than casket lots.

APPENDIX D - GLOSSARY

CREMATORIUM: The building or part of a building fitted with approved equipment for cremation of human remains.

CRYPT: A space in a mausoleum used or intended to be used for the entombment of human remains.

DEATH CERTIFICATE: A legal document certifying the vital statistics about the life and death of a deceased person.

DIRECT DISPOSITION: The final disposition of human remains without any formal viewing or visitation, ritual, rite, service or ceremony. Also known as IMMEDIATE DISPOSITION.

DISINTERMENT: The removal of human remains, along with the casket or container or any remaining portion of the casket or container holding the remains, from the lot in which the remains had been interred.

DOUBLE DEPTH LOT: A lot dug at extra depth at the time of the interment of the first casket to allow for the accommodation of a second interment at regular depth.

ENTOMBMENT: The placement of human remains in a mausoleum crypt. See also INTERMENT.

EXHUMATION: The exposure of interred human remains for viewing or for examination, whether in or removed from the grave in which the human remains had been interred.

FAMILY ESTATE PLOT: Multiple lots grouped to accommodate members of a family.

FAMILY VESSEL: A large urn for several cremated remains of family members. Remains may be comingled or may be contained in smaller, individual urns held within the larger vessel

FINANCIALLY ASSISTED FUNERAL SERVICES: Financial assistance provided through government-run programs for families and individuals who do not have enough money to pay for funeral services.

FLAT MARKER: A grave marker set flush with the ground.

FUNERAL SERVICES: The arrangements, care and preparation of human remains for interment, cremation or other disposition and includes the supply of goods incidental to the arrangements, care and preparation but does not include the sale of lots.

GRAVE: A planned area in a cemetery used or intended to be used for the burial of a casket, shrouded body, or cremated remains. See also LOT

GRAVE LINER: A fibreglass or concrete structure installed over a casket once placed in the grave. See also CONCRETE LINER

GRAVE MARKER: A stone, metal, or wood form typically placed at the head of a grave, used to mark the grave location and memorialize the deceased.

GREEN BURIAL: A more environmentally conscious alternative to traditional burial. See greenburialcanada.ca. Typically, green burial involves:

APPENDIX D - GLOSSARY

- no embalming;
- burial directly in the ground without a grave liner or vault;
- a fully biodegradable casket or shroud;
- interment sites planted with indigenous ground cover, and
- without individual grave markers.

INTERMENT: Disposition by:

- burial of human remains or cremated remains in a grave;
- entombment of human remains in a mausoleum, crypt, or
- inurnment of cremated remains in a columbarium niche.

INTERMENT RIGHTS HOLDER: The person whose name the right of interment in a lot is registered in the records of a cemetery, and where the interment has taken place includes the person who has legally acquired ancillary rights to the lot. Also known as lot holder.

INURNMENT: The process of placing cremated remains in a receptacle, including, but not limited to, an urn and placing the urn into a niche.

INVENTORY: The total amount of developed and installed interment spaces available for sale, including grave lots, crypts, and columbaria niches.

LAWN CRYPT: A concrete or other durable, rigid outer receptacle installed in a grave before burial. See also BURIAL VAULT.

LEVEL OF SERVICE: Level of service refers to the degree of investment—encompassing financial resources, time, effort, and other key processes—an operator allocates to its cemetery's site care, asset maintenance, and the breadth of interment and memorialization services offered. The level of service is measured on a scale ranging from Basic (Legislative Minimum) through Average (Common Practice) to Optimal (Best Practice), each reflecting progressively higher standards of operation and service quality.

LOT: A space used, or intended to be used, for the interment of human remains or cremated remains under a right of interment and includes a grave, crypt, niche or plot.

MAUSOLEUM: A structure or building that contains interior or exterior crypts designed for the entombment of human remains. Plural: MAUSOLEA.

MAUSOLEUM CRYPT: A chamber of a mausoleum of sufficient size for the entombment of human remains.

MEMORIAL: Something used or intended to be used to identify a lot or to memorialize a deceased person interred or to be interred in a lot, including but not limited to a:

- marker, headstone, tombstone monument, plaque, tablet or plate on a lot,
- tablet inscription, lettering or ornamentation on a crypt or niche front,
- tree, boulder, wall or other feature,
- ceremony, rite or ritual commemorating the life of a deceased individual without the human remains being present.

APPENDIX D - GLOSSARY

NATURAL ORGANIC REDUCTION (NOR): The practice of reducing human remains through a controlled, organic process to produce a soil-like material called humus.

FLOWER TABLE: An amenity feature in a cemetery where people fill vases with water and dispose of garbage. It often provides watering cans, flower vases, and hand tools.

NICHE: A specialized compartment within a columbarium designed to hold urns containing cremated remains.

OSSUARY: A vessel for the interment of cremated remains. Typically, the cremated remains are commingled.

OUTER CONTAINER: A receptacle designed for placement in a lot to accept a casket or urn.

PERPETUAL CARE FUND: An irrevocable trust fund established, held and administered by applicable law. The income from the fund is used for the upkeep and repair of a cemetery, mausoleum or columbarium. It is also known as the Perpetual Care & Maintenance Fund, Care Fund, or Maintenance & Care Fund. The legal definition and name of this type of fund vary across provinces and states.

PRE-NEED PLANNING: Pre-need planning refers to making arrangements or entering into contracts regarding future cemetery services for one or more persons still alive.

REGISTRAR: The person responsible for administering and enforcing applicable laws and regulations relating to cemetery and funeral services. This person is the Director of Cemeteries in British Columbia or Alberta.

SCATTERING: The irreversible dispersal of cremated remains over land or water or commingling in a defined area in a cemetery.

SCATTERING GARDEN: An area within a cemetery, usually providing an attractive natural or ornamental setting, dedicated to the scattering of cremated remains.

SPIRIT HOUSE: A wooden shelter over a grave to house the spirit of the dead, sometimes found in Indigenous cemeteries.

UPRIGHT MARKER: A grave marker that is vertical

URN: A receptacle for containing cremated remains.