



Notice of consideration
for a

Natural Burial Cemetery

Comments requested by June 4, 2021.

Council will consider the Natural Burial Cemetery request at the June 16, 2021 Council Meeting.

Registered Owner: Sara Benjamin
Civic Address: 355310 Blue Mountains Euphrasia Townline

What is being proposed? The Municipality is seeking input on a request to establish a stand-alone Natural Burial Cemetery on a 100 acre parcel in Grey Highlands.

Why? Under the Funeral, Burial and Cremation Services Act, the municipality shall grant the approval if, in the municipality’s opinion, it is in the public interest. Council is requesting your input to assist in determining public interest.

Written comments are requested by June 4, 2021 so that they may be available to Council in advance of the meeting for consideration.

What is a Natural Burial Cemetery? Natural burial returns the body to the earth in a protected green space so the body can contribute to the earth’s renewal. The body is buried in a biodegradable casket or shroud in a natural burial ground. There is no embalming and no vault surrounding the casket. The body will be placed a minimum of 2 feet beneath the surface as required by law. Those laid to rest in a green burial ground do not have grave markers above each plot, however there will be a communal marker such as a wood wall or large rock with names engraved. The entire meadow becomes their place of rest, and family members are welcome to enjoy the serenity of all the grounds.

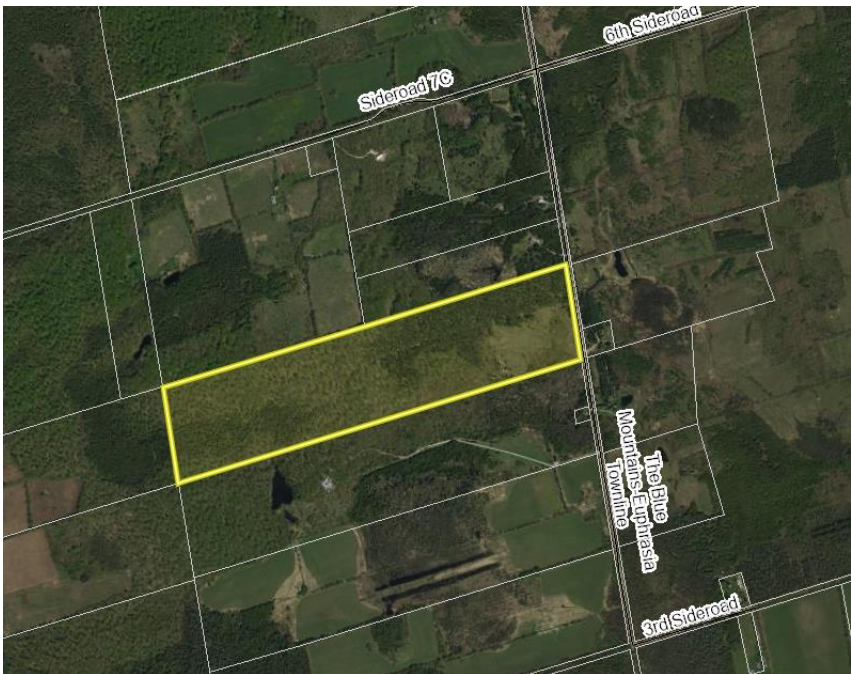
When will a decision be made? It is anticipated that Council will consider the request for approval at the June 16, 2021 Council meeting.

Want to be notified of a decision? Once a decision has been made, the municipality is required to publish the decision in the local paper.

A note about information you may submit to the Municipality: Individuals who submit letters and other information to Council should be aware that any personal information contained within their communications may become part of the public record and may be made available through the Council agenda process.

Where do I submit my comments?

Please submit written comments to:
Municipal Clerk
Municipality of Grey Highlands
206 Toronto St. South, Unit 1
PO Box 409
Markdale, ON N0C 1H0
Email: Clerk@greyhighlands.ca
Phone: 519-986-1216 x233



REPORT

TO: Council
FROM: Raylene Martell
DATE: May 5, 2021
REPORT: CLS.21.12
SUBJECT: Natural Burial Proposal in Grey Highlands

RECOMMENDATION:

That Council receive staff report CLS.21.12 - Natural Burial Proposal in Grey Highlands; and

That Council direct staff to post notice to of Council's consideration of the creation of a Natural Burial Cemetery in Grey Highlands to all those within 120 m of the subject property and requesting comments to be received no later than June 4, 2021 ; and

That Council direct staff to provide an overview of comments received to Council for consideration of approval at the June 16, 2021 Council meeting.

BACKGROUND AND ANALYSIS:

Sarah Benjamin and Susan Greer delegated at the February 17, 2021 Council meeting and introduced Council to Natural/Green Burials. At the meeting, Sarah and Susan were seeking an agreement in principle from Council to support the creation of a Natural Burial Cemetery in Grey Highlands on a 100 acre forest and meadow property located at 355310 Blue Mountains Euphrasia Townline.

There is substantial information regarding natural or green burials on the [Natural Burial Association website](#). I have highlighted some information from the website in this report.

What is a Natural or Green Burial? Generally natural burials provide for an end of life option that has minimal impact on the environment. Natural burial returns the body to the earth in a protected green space so the body can contribute to the earth's renewal. The body is buried in a biodegradable casket or shroud in a natural burial ground. There is no embalming and no vault surrounding the casket. The body will be placed a minimum of 2 feet beneath the surface as required by law. Those laid to rest in a green burial ground do not have grave markers above each plot, however there will be a communal marker such as a wood wall or large rock with names engraved. The entire meadow becomes their place of rest, and family members are welcome to enjoy the serenity of all the grounds.

OPERATIONAL CONSIDERATIONS:

There are no different regulations related to the approval of a Natural Burial Cemetery. All cemeteries – Natural, Green etc. etc. must comply with the Funeral, Burial and Cremation Services Act, 2002 and associated Ontario Regulations. They must also comply with any and all related by-laws which may be applicable and specific to the municipality within which they are to be established.

All cemeteries and their operators in Ontario must comply with the Funeral, Burial and Cremation Services Act, 2002 & associated Ontario Regulations. They must, following municipal approval, apply to the Registrar, Bereavement Authority of Ontario, for consent to establish the cemetery and obtain a licence to operate the cemetery. The licence to operate the cemetery will only be issued once a Care and Maintenance Fund with \$100,000 (\$165,000 as of Jan 1, 2022) is established.

Under the Act, A local municipality that receives a request for an approval to establish a cemetery in the municipality shall grant the approval if, in the municipality's opinion, it is in the public interest. In the past, Council has used the planning process to determine public interest, however this property is in the Niagara Escarpment and no Grey Highlands Planning process will be triggered. In order to provide consistency with the past practice, staff are recommending sending a notice to all properties within 120 m of the subject property.

Upon deciding to approve or refuse a request for an approval, the municipality must send a copy of the decision together with the reasons for it to the registrar and to the person making the request; and publish notice of the decision in a local newspaper. Any decision made by Council is appealable under the Act.

Consideration

At any time that a cemetery located in Grey Highlands becomes abandoned, the municipality shall become the owner of the cemetery with all the rights and obligations in respect of the cemetery and the assets, trust funds and trust accounts related to it that the previous owner or operator had.

GREY HIGHLANDS STRATEGIC PLAN:

Respected Environment

FILE OR REFERENCE:

Attachment - Draft Notice

Approved By:

Raylene Martell, Director of
Council and Legislative
Services/Municipal Clerk
Karen Govan, Chief
Administrative Officer

Status:

Approved - 23 Apr 2021

Approved - 27 Apr 2021



Notice of consideration for a Natural Burial Cemetery

Comments requested by June 4, 2021.

Council will consider the Natural Burial Cemetery request at the June 16, 2021 Council Meeting.

Registered Owner: Sara Benjamin

Civic Address: 355310 Blue Mountains Euphrasia Townline

What is being proposed? The Municipality is seeking input on a request to establish a stand-alone Natural Burial Cemetery on a 100 acre parcel in Grey Highlands.

Why? Under the Funeral, Burial and Cremation Services Act, the municipality shall grant the approval if, in the municipality's opinion, it is in the public interest. Council is requesting your input to assist in determining public interest.

Written comments are requested by June 4, 2021 so that they may be available to Council in advance of the meeting for consideration.

Date of Notice: May 7, 2021

What is a Natural Burial Cemetery?

Natural burial returns the body to the earth in a protected green space so the body can contribute to the earth's renewal. The body is buried in a biodegradable casket or shroud in a natural burial ground. There is no embalming and no vault surrounding the casket. The body will be placed a minimum of 2 feet beneath the surface as required by law. Those laid to rest in a green burial ground do not have grave markers above each plot, however there will be a communal marker such as a wood wall or large rock with names engraved. The entire meadow becomes their place of rest, and family members are welcome to enjoy the serenity of all the grounds.

When will a decision be made?

It is anticipated that Council will consider the request for approval at the June 16, 2021 Council meeting.

Want to be notified of a decision?

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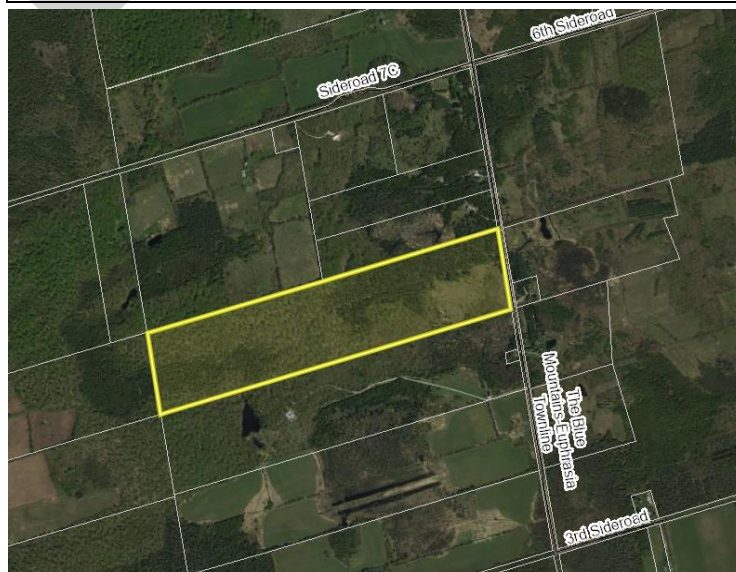
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Phone: 519-986-1216 x233



This document can be made available in other accessible formats as soon as practicable upon request

June 4, 2021

Dear Councillors and Municipal Staff Members,

I am buoyed by the overwhelmingly positive response to the idea of establishing a natural burial cemetery in Grey Highlands. I have heard from both nearby neighbours and from community members further afield.

These responses have validated the need for this in our community and have solidified my commitment to endeavour to deliver this service.

My husband and I held a zoom meeting for our Duncan community members and for others that had reached out with questions through the clerk. We took the opportunity to address questions that were raised during the meeting, and to answer questions that had been directed to the clerk and forwarded to us.

I am attaching a summary of those questions and answers for you, to help inform your decision on June 16th.

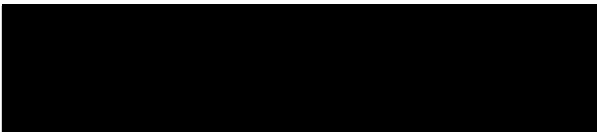
I thought the council would appreciate seeing the comments from people who took the time to let the Natural Burial Association (a non-profit volunteer organization) know why natural burial appeals to them.

I have isolated only the comments from those in the NOC and NOH postal code zones. The Natural Burial Association did not receive one negative comment, only one query about gas mileage.

I am hopeful that I will be able to deliver to our community a new kind of cemetery, an alternative option that is taking the US and UK by storm, and an idea that is clearly anticipated with enthusiasm in Grey Highlands.

This business concept not only aligns with the township's environmental stewardship objectives, it also supports alternative business models. In passing this motion, council will be giving the community an option of an eco-friendly goodbye.

Warmly,

A large black rectangular redaction box covering the signature area.

Sara Benjamin



A Natural Burial Ground in Grey Highlands Answers to Questions Raised by the Community

Submitted by Sara Benjamin
benjaminsara34@gmail.com (705) 443-9038

WILL OUR WATER BE TAINTED WITH DISEASE? WILL LIQUIDS FROM THE BODY SEEP INTO THE WATER?

The graves in natural burial grounds are designed to take advantage of how water moves through the eco-system. For rapid decomposition, the body is buried closer to the surface (approx 3 feet rather than the conventional 6+ feet). There must be one metre distance between the body and the water table. No grave can be within 75 metres of a potable water source. The legislation governing cemeteries ensures that no cemetery is approved without the above restrictions in place. These measures provide extra protection. The main avenues for decomposition fluids to cause illness are that of fluids contaminated with prions (misfolded proteins which can cause transmissible spongiform encephalopathies; TSE) or fecal matter containing E. coli entering water systems. The ability for these pathogens to travel through soil and infect other organisms is severely limited due to their tendency to either bind to soil particles or be broken down (Bartelt-Hunt and Bartz 2013). Today, natural burial is practiced among many, for instance both the Jewish and Muslim faith, as well as any individual that does not embalm or purchase a vault. Livestock and pets are also buried naturally. To ensure that the proposed site complies with the above, a hydro-geological study will be initiated.

WILL THE ANIMALS DIG UP THE GRAVES?

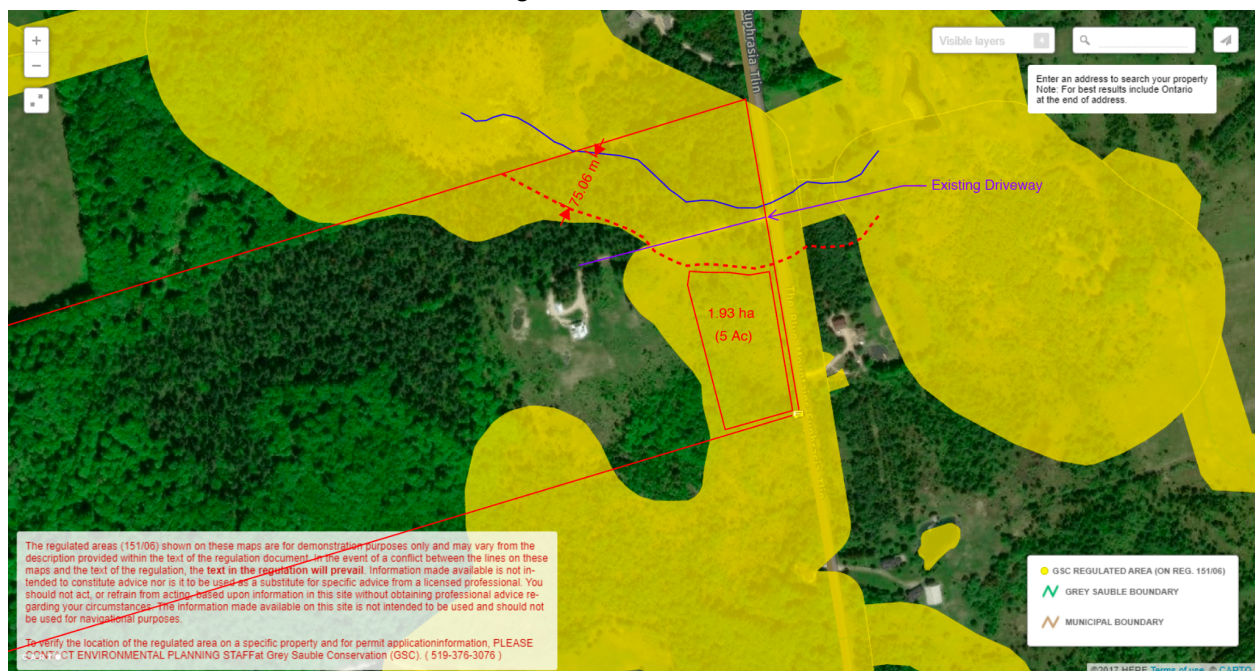
Insects and bacteria are essential in the decay process and by burying bodies in shallow graves when compared to conventional burial they are able to break down soft tissues more rapidly. In grave depths typical of natural burial the volume and weight of soil dissuades animals from digging down in favour of easier to acquire resources on the surface. There is also a smell barrier

of 18” beyond which the animals do not smell the body (Green Burial Council). Additionally the animals which are typically the greatest concern are not likely to seek out rotting meat as a food source. Burrowing animals such as groundhogs, weasels and rodents do not seek out carrion (decaying animals) as food sources. Furthermore, the FBCSA ss 154.(2) of O. Reg 30/11 states that human remains are buried at least 0.61m or 2 ft below the natural level of the ground surface. Natural burials take place at three to four feet below the surface.

WHAT WILL THE CEMETERY LOOK LIKE?

The cemetery will look like the land does right now. It will look natural. The proposed site is a meadowed area of 1.93 hectares (5 acres) at the front of the property. Originally it was new growth forest and this will be tamed to ensure that any fallen trees or obstacles that pose a safety risk are removed. Aside from a trail, there will be native flora and fauna. There could be birdhouses, and when a landscaping plan is finalized, attention will be paid to which native species of trees and plants would best nurture the eco-system. We welcome input from the local conservation authority (Grey Sauble Conservation Authority).

Conventional cemeteries have over 1000 plots per acre. Natural burial grounds, in order to be responsible land stewards, typically offer between 300 and 500 plots per acre for full body burial. The grave itself is usually 3’ x 7’, and the plot allowance is usually 4’ x 10’. This cemetery will also allow cremated remains. This is important for people because of the logistics involved in natural burial, the cost (cremation is less expensive than full burial) and also, it allows loved ones who die at different times, to be together in the afterlife.



WILL THERE BE BUILDINGS? WHAT KIND OF INFRASTRUCTURE WILL EXIST?

The concept of a natural burial ground calls for minimum intrusion on the eco-habitat. While the details of this site have not been finalized we can assume:

- There will be a walking trail, perhaps two, which will make the graves accessible to families. These will be gravel, and wide enough to hold a backhoe if that is the chosen method of grave digging.
- There may be fencing as a way of creating boundaries to this sacred space, but it is our wish to avoid fencing if we can to maintain the integrity of natural spaces.
- There will be an area for parking, gravel only, with an allowance for no more than 10 cars
- There may be an outdoor pavilion. This could be created from local stone with a roof of local timber. It would allow families to seek protection during inclement weather
- There will be a compostable toilet in an outhouse (constructed of natural material, not the common plastic model). This recognizes the fact that often elderly attend funerals and may require the facilities more frequently.
- Rather than individual tombstones, there will be a communal marker. This could be an artistic concept designed by a local artist (TBD) or it could be a large boulder (local) with the names of the deceased engraved.

WHAT WILL HAPPEN TO THE CEMETERY IF I MOVE OR DIE?

This is our family home, which we built from scratch. We do not want to move, in fact I'd like to be buried here. However, were I to die, there are two options:

- We sell the cemetery to a private owner. There are so many people passionate about this alternative interment option, I am confident that this option is a viable one.
- The cemetery could be turned over to the municipality, along with the Care & Maintenance Fund.

It is important to note that natural burial grounds do not require the maintenance of a conventional cemetery. There are no grave markers requiring attention if they topple over, no grass that needs mowing. No weeding or pesticide application. No resurfacing of pavement or roadways. Mother Nature is the steward.

WILL THIS HAVE AN IMPACT ON THE VALUE OF NEARBY PROPERTIES?

There is polarized opinion about the value of conventional cemeteries on nearby property. For some, it is a guarantee of quiet and no development, and hence the value is higher, while for others they feel uncomfortable with the idea of the morbid looking tombstones, etc and stay clear of cemeteries. There are no statistics for new burial grounds. On judgement, given that the cemetery will protect the land in its natural habitat forever, we feel this will be a positive to neighbours also keen on preserving a pristine natural environment.

WILL THERE BE A LOT OF TRAFFIC AND INCREASED FOSSIL FUEL USAGE?

An increase in traffic is not a concern. There are a few reasons for this. Natural burials take place soon after a death. They are typically intimate gatherings of family and close friends. The ceremony, whether in a pub, a church or a funeral home, takes place at a different time and

place. Toronto is two hours away. It would be very rare for a family from Toronto to drive two



hours for an interment. The demand for natural burial grounds is growing and cemeteries closer to the GTA will open in response. Residents will likely travel by car and with time those cars will be electric. People take comfort knowing they didn't use the SUV tank full of gas that is required for each cremation.

HOW LONG WILL IT TAKE TO CREATE A NATURAL BURIAL GROUND FOR THE GREY HIGHLANDS COMMUNITY?

It won't happen overnight. There is much oversight, both environmental and as part of cemetery regulations. The steps will be outlined pending council approval, and then we will have a better idea of the timing and the cost involved. Suffice to say it will be years, not months away.

No cemetery operator is granted a license until the cemetery's bylaws have been approved. This is an opportunity to provide regulations which ensure the integrity of the neighbourhood is not compromised. It can include regulations such as number of cars allowed for any one burial, hours the site is open to the public, whether a tombstone is allowed (no), what's permissible when visiting and during an interment, etc. These bylaws will be created with public interest in mind, as well as the environment.

AM I CAPABLE OF THIS UNDERTAKING?

Yes. Natural burial grounds are changing the landscape of death in the US and the UK. Grey Highlands can also join this popular undertaking which after all is not a new idea, but an old idea getting renewed attention. These natural burial grounds are being created by doctors, farmers, ministers, people who see this as a passionate call for the community rather than a profit generator. I am equipped to shoulder the responsibility of this for my community and with my community, including:

- Excellence in all manner of complying with the Cemetery Operators License issued by the Bereavement Authority of Ontario (fund management, pre-sales management, plot location identification, transparent communications with consumer, network building with local funeral homes, florists, celebrants, faiths, environmentalists, etc).
- Compassion to offer families a new kind of goodbye and be responsive to them at their time of need
- Expertise in best practices. I am engaged in learning from the very best, Canadian owners (BC) and US owners of natural burial grounds who share their learning to help this nascent idea become a mainstream offer for people and the planet.
- Fundraising. The response from the community has been overwhelmingly positive, including offers of financial support to make this project a reality.

WHAT ARE MY MOTIVES?

I understand that people are curious about my motivations for pursuing this endeavour. Some may wonder if my husband and I purchased our property with the intention of establishing a cemetery on the property. The answer to that question is no. Our journey as a family, and as individuals within a family unit, is ever changing and evolving.

I am interested in establishing a natural burial cemetery in our community because I believe in its merits, for humans and for our planet. I had the good fortune to grow up on a 50 acre farm just outside of Stayner. I did not realize what a gift this was until I was an adult, and I started to see the ways that farm life seeped into me. I am at home when I am in nature.

I am willing to pursue creating a space where humans can choose nature as their final resting place because I believe that this idea is beautiful on so many levels. A portion of this gorgeous lush green place that we call home can be shared with others. We can be united in our vision for protecting green spaces and honouring Mother Earth with choices that we make related to living *and dying*. It is a vision that evolved naturally and organically, fuelled not as a business proposition but as a personal and community need.



I want people in my community to have an end of life choice that supports their love of nature and their desire to protect our environment. It really is that simple.

natural burial

ASSOCIATION

“ I would like to contribute to regrowth and forestation as part of my burial process.

*LG NOH**

“ We prefer this option for ourselves. For me it symbolizes a return to nature with minimal carbon cost.

DV NOC

“ As a budding naturalist, I am keen to ensure that our natural environment survives even if mankind does not, so I feel natural burial is one more step to help nature do what it does best!

SH NOC

“ I like the idea of my body going back to nature.

MH NOC

“ I love nature and find great peace when I am out in the woods and by the water. A wonderful place to be and enjoy with family and friends

JB nOH

“ It's the environment i enjoy while living.

JH NOH

“ Amazing the way we used to get back to nature. I would love to have this as my last will and testament.

LL NOC

* Person's initials, first 3 digits of postal code

“ Back to the earth from which we came! No artificial barriers between me and the worms.

LS NOH

“ I want my death and burial to be congruent with who I am. Living and dying do not need to be sanitized. I am excited to learn about the efforts being made, and the movement afoot. You have given me hope for a different ending! I look forward to learning more...

KD NOH

“ We are born as nature so let us die in the same way – free to feed the earth with my body as I have spent my lifetime taking food from the earth. Life is full circle from birth to death.

SN NOC

“ The whole idea of natural renewal appeals to me. I prefer this idea than to being encased in a cement tomb, never returning to dust.

SS NOC

“ No forest cleared and land wasted as a shrine to the dead

JF nOH

“ I am drawn to the comfort, beauty, subtly and peace of a natural landscape as a final resting place. The formal, manicured “modern” cemetery is not very appealing.

AA NOC

natural burial

ASSOCIATION

“ I absolutely adore natural landscapes, flowers and birds, and I find solace and peace in such places. Therefore it would make sense to desire a natural environment for my final resting place. I have never been a supporter of the conventional burial and funeral industry. I strive to find new ways to break that mold and to explore natural sustainable ideas such as this project.

*MM NOH**

“ I have always said I wanted to be a tree with wildflowers growing over me.

KC NOH

“ It sounds like a beautiful and peaceful idea.

MC NOC

“ It's how it should be

AB NOC

“ We value the earth and wish to return all the nourishment we have enjoyed. Delicious to imagine a beautiful space where our great-grandchildren and others can saunter. Being encased in concrete, and harming the ecosystem is repugnant to us. And we need to protect land from the onslaught of development in The Blue Mountains.

JB n0H

“ This is much more environmentally friendly!!!

AE NOC

“ It is natural and makes sense. Why do we embalm? Who wants corpses around forever?

MP NOC

“ I have always been bothered by traditional burial methods.

SR NOC

It's how it should be

AB NOC

“ Because it just makes complete and total sense to return to the earth.

NC NOC

“ It sounds like a beautiful and peaceful idea!

MC NOC

“ it just makes so much sense. to give back to our planet.

CE NOC

“ Simple and natural. I did not know it was possible anymore.

CR NOG

“ I like to think about being useful after death by providing nutrients for ongoing growth

HK n0c

“ I always strive to leave a small footprint.

GM NOC

* Person's initials, first 3 digits of postal code

natural burial

ASSOCIATION

“ Earth Day was created when I was 11 yrs old, on my birthday. I have loved nature my entire life, I long to live in the country again. I am now a senior, and realize my dream will be only a dream. To be buried in nature, with only a linen cover over me in my bio casket is my wish, however, the closest one is near Guelph. I now reside in Markdale, & will be here to the end. This is the greatest way to honor a body that has carried me over & through my life. A natural way of going back to the earth has always struck me as the only way to go out. Not being embalmed or cremated or in a cement encasement is the right way to honor mother earth as well. We've all done enough damage to the earth! I love the idea of having my name on a rock as well. I am a stone hound, so this is great! To be out in a field of grass, where the winds blow, the rain pours, the sun shines & it's peaceful & quiet is my wish & dream! Please make this happen for those of us who love mother nature.

*JS NOC**

“ I have no reason to try to preserve this body. I certainly don't need a gravestone; trees are so much more beautiful. A natural setting pleases me more than a formal cemetery.

SW NOH

“ Think this is an amazing idea

SC NOH

“ Preserving natural places is so important to me as I watch these special places get destroyed rather than mindfully considered as critical to our survival. I want my grandchildren to be able to spend time in nature and understand what that really means.

SM n0h

“ Sooooo many reasons: sustainable, beautiful, efficient ... but the biggest reason is that it is natural. Embalming, cremation, huge/ornate boxes ... all unnatural to me. Our bodies naturally revert to the earth like all other organisms in nature. Financially, socially, environmentally ... it's clear we need natural burial everywhere.

JC NOC

“ I am a lover of nature and all that lives on our beautiful earth and would like my body to be made available as nourishment for the earth.

HK NOH 1J0

“ I would like to leave as small an environmental footprint as possible when I die.

HS NOC

“ I have buried four dearly loved pets in a dedicated area of my garden. Wrapped in cotton shrouds, with a stone to mark their final resting place, the wildflowers and grass grow above them. That is what I wish for myself.

HJ NOC

* Person's initials, first 3 digits of postal code

© Natural Burial Association 2021.

natural burial

ASSOCIATION

“ It provides more choices for people when dealing with a death of a love one. We should continue to look for ways to be kinder to the environment. And having the opportunity to provide this service local and not just in the city environments is beneficial for people living in grey county.

KF NOC

“ I am very concerned about the damage we are doing to the environment and would like to do everything possible to minimize my own impact on the natural world - both in life and in death.

HR NOC

REPORT

TO: Council
FROM: Raylene Martell
DATE: June 16, 2021
REPORT: CLS.21.22
SUBJECT: Natural Burial Request - Overview of Comments Received

RECOMMENDATION:

That Council receive staff report CLS.21.22; and

That Council determines that the addition of a natural burial site in Grey Highlands would be in the public interest if all regulatory approvals have been obtained; and

That Council of the Municipality of Grey Highlands grants approval in principle only at this time for a natural burial site to be located on the property known as 355310 Blue Mountains Euphrasia Townline conditional on obtaining approval from the Niagara Escarpment Commission and any other regulatory body required (except BAO); and

That Council will only consider final approval as required under Section 84(1) of the Funeral, Burial and Cremation Services Act, 2002 after all relevant research, studies and applications required have been completed and approved and provided to the Municipality.

BACKGROUND AND ANALYSIS:

On May 5, 2021 Council received staff report [CLS.21.12](#) and directed staff to post notice of consideration and to come back with any comments received.

As per the direction, notice was sent out to all those property owners within 120 m of the subject property as per the Municipal GIS platform. Notice was also posted in the Grey Highlands What's Happening section of the Flesherton Advance on May 19, 2021 and posted on Social Media on May 10th and May 24th 2021.

Section 84 (1) of the Funeral, Burial and Cremation Services Act, 2002 (FBCSA) states that a local municipality that receives a request for an approval to establish a cemetery in the municipality shall grant the approval if, in the municipality's opinion, it is in the public interest.

Comments Received from the Public by June 4th deadline:

All commenters received a reply that their comments would be included in the report, any additional comments have also been noted below

Janice Campbell & Richard Waugh (Eugenia) via email:

"We would like to support this proposal. It is something we would consider for our family as a natural option after death."

Bentley Patey via email:

"I am writing to whole heartedly support the proposed natural burial cemetery in Grey Highlands. My son has made it clear for years that his wish is to be buried in a similar site upon his death citing that he feels the usual practices of modern burial (cremation, vaulting, chemical preservation, burying high quality wood products) are deeply problematic in terms of wasting precious resources and in terms of having dire environmental consequences. Natural burial is also an excellent opportunity for carbon sequestration. Practices like cremation have exactly the opposite impact releasing massive amounts of carbon into the atmosphere.

These sites are currently few and far between in Ontario. Developing one in Grey Highlands would improve access to natural burial regionally. It will also provide a local example of low carbon footprint innovation/investment to spark further conversation and to be a catalyst for other projects locally with similar outcomes.

While the approach to interment is different in this example, I encourage members of council to explore the information and statistics provided by the folks at <https://recompose.life>. This project very clearly details the deleterious impacts of traditional modern burial practices

I encourage council to approve this project without hesitation."

Bo and Brian Penny (Kimberley) via email:

"This email is to express our full support for the natural burial site on the proposed location in Grey Highlands.

We strongly believe that this is far better solution than any of the traditional burial options available and we hope that the Council will approve the application so that our family can have final resting place in our beautiful and beloved Grey Highlands."

Jennifer Schwarz via email:

"We are new residents to Grey County, parents with two children under 16 years and we support a proposal for a natural burial site as we would prefer and use a service like this over any other. Please consider changing attitudes towards land usage and other religious beliefs when making your decision. I would be willing to comment further if needed."

Nicole Carter via email:

"Dear Council, you have my full support for a natural burial site in Grey Highlands. How exciting that we have an opportunity to be amongst some of the first municipalities to have this option available to our community. I believe wholeheartedly that natural burial will become the norm sooner than later. I eagerly await approval of this project."

Ashley Davis (GH Resident) via email:

"As a resident of grey highlands, I am writing to offer my support of the idea of offering a natural burial site in the area! This is, in my opinion, absolutely the way that the world is heading and I think you will see a great amount of citizens opting for this type of end of life option in the near future! Hugely in support of this idea!"

May Tettero via email:

"I am writing to indicate my support for a Natural Burial Site in Grey Highlands. I do not believe in adding to the earth's pollution by using embalming chemicals or putting non-biodegradable items in the ground. My family chose natural burial when my grand daughter died and I support this option to be available for all residents."

Hester Koopman and Ron MacDonald via email:

"Hi there, My husband and I are both in support of the development of a natural burial site in grey highlands. Thank you for keeping us informed of the progress that is being made."

Mariya Genkova via email:

"I would like to support the initiative for Natural Burial Cemetery and believe many others do so as well. Thank you for considering this request and I am very hopeful that Grey Highlands will establish the proposed 100 acres Natural Burial site."

Brad Peterson via email:

"This is supported in concept and in practice."

Daniel Kolos (former Artemesia) via email:

"In response to the comments request, having lived in the former Artemesia Township since 1988, I have become part of a growing group of local people, which continued even after I moved to the neighbouring West Grey. This growing group of people, both long-time and new residents, share an interest in healthy living that has encompassed summer and winter outdoor activities, organic foods and various self-care activities such as yoga, music, dance, etc.

These activities have one thing in common: they leave the least amount of toxic impact on our environment. The next step is natural burial. It is a logical progression that I can support."

Mike McKelvey (Paisley) via email:

"Yes, please add my name and support in favour of this end-of-life option, here in grey-Bruce!"

I fully support the ability to have a no-impact burial option. The embodied energy, and environmental destruction caused by large amounts of chemicals (read: ANY chemicals/preservatives, etc.) and concrete, plastics, rubber, foam, treated wood, being buried to encase a corpse is silly, and not sustainable. Please pass this permit, in the interest of the public."

Ryan Gillespie (GH resident) via email:

"I am writing in support of the green burial development. I think it will be great for the environment and also ease the financial burden of the death process on family's that had a loved one depart.

I am a resident of Grey Highlands and think this is fantastic for the community."

Allan Avis (Flesherton) via email:

"I am writing in support for the proposed Natural Burial Cemetery at 355310 Blue Mountains Euphrasia Townline. I favour this form of burial above of all other options currently available and would personally be interested in having this site as my own personal resting place."

Bev Falco (Priceville) via email:

"I was very interested to read that a Natural Burial Ground is being planned for Grey Highlands. It is exactly what myself and many others have been discussing and hoping for. We are mostly concerned with the carbon footprint of the entire current funeral and burial process and to state it simply, would prefer to become compost and give back to the land. Even the cremation process is not environmentally friendly and again releases CO2 into the atmosphere.

All human activity must be rethought, as to how much energy and CO2 is being used and created in everything we do. When you think about the gathering of raw materials, land destruction, habitat destruction, transportation, energy to manufacture, more transportation, and factor in the question "Why are we doing this, again?" it really makes no sense.

Ask these questions in regard to the toxic embalming fluids, the concrete, the mahogany/oak/cherry/etc for coffins, the marble/granite/etc headstones. It is time to take a serious look at the consequences of human activities. This initiative, which is really a return to a correct way of life, and not "new" at all, should be unanimously agreed upon by this council. I will certainly be one of the first in line to make use of a natural burial ground, and find it extremely disheartening that I don't currently have that option in this area.

I commend Sara Benjamin for initiating this project and look forward to a positive outcome!"

Sandra Green via email:

"That is not right. We have lived here for 37 years. Never heard anything like this. SERIOUSLY. Sorry we don't agree."

Vanessa Moreal via email:

"I am very much in support of the natural burial site!"

Kim Dzyngel (Tara) via email:

"The following statement is one that I made on the website for the Natural Burial Association recently, in answer to their question. I am submitting it also to you, because, although I do not live in Grey Highlands, (I live in Tara Ontario) I am delighted to know that there are people beginning to make smart decisions about burials near where I live. My statement will help you understand why I feel this way. Why does natural burial appeal to you? Your comments inspire us!

I am in my 50's and have been thinking about this since I was a young woman living in small town Northern Ontario. In my 20's I lost my mother (too soon), and watched the process of burying her. It just seemed lacking in so many ways. My mother had always been a lover of nature, and fierce protector of wilderness. She was buried in what had until a few years earlier, been a gravel pit (something she was very angry about), but was the only option in our community. Before her

untimely passing, she had railed against the neglect that she saw of the cemetery's care (calling it "perpetual neglect"). Sadly, the cemetery still looks like a gravel pit... Since that time, I have followed natural burial information occasionally, and have told anyone who would listen, that I want a tree planted over me. It just makes sense to me. I abhor the wasting of precious resources (coffins etc), and recognize that it is unnecessary. We have so sanitized dying. While I was a young girl, I visited an elderly Ukrainian neighbour in her home with my mother. This lady was excited to show us her beautiful hand stitched and embroidered garment that she made for her funeral. It was on the top of the coffin she had chosen, and both were in her front spare bedroom. It wasn't until years later that I realized how unusual this was. For her, it was the most natural thing in the world. That made sense to me. It was congruent with who she was. I want my death and burial to be congruent with who I am. Living and dying do not need to be sanitized. I am excited to learn about the efforts being made, and the movement afoot. You have given me hope for a different ending! I look forward to learning more... Thank you very much for considering this proposal. This kind of opportunity will provide the area with something to be proud of, and something that recognizes that our lives and deaths can meaningfully give back to our precious earth and to future generations. I personally want to be part of that legacy, and I hope you do too."

Gillian and Frank McEnaney via email:

"We hope you're staying safe and well during the pandemic. We were very excited recently to hear that you are considering the idea of making a portion of land near Euphrasia available for Natural or Green Burial. This is something that we've been interested in for years and never thought would actually happen. At least, not in our time! We're in our sixties and seventies and we would love to have this option available to us."

Michael Johns (Clarksburg) via email:

"We are the adjoining property to the north of the property that's applied for the Natural Burial Cemetery that would be severed in a 3 to 5 acre parcel to the south of their driveway close to the Townline. We share a 2200 foot lot line with the Applicant. Given that the location of the Cemetery does not abut our property, we have no opposition to their Application. If the location was changed to abut our property line, we would respectfully request that the location be moved to allow a 100 foot distance between our property line and the proposed Cemetery."

Marie Keyzer via email:

"My first experience with natural burials was my own mum in England the summer of 2019. I did not know anything about this type of burial. I found it very peaceful. Less evasive to the earth and afterwards a very calming place to be.

That being said.. this location is a field out in the open. It would be nice to have trees and wildlife.

The location in England has been doing these types of burials for many years. It is a wooded area. And although no markers are visible each person is buried beneath a tree and there are options for the placement of a bird house on the tree with a name plaque.. benches and wild flowers grow where they may. Planting of natural flowers are also acceptable.

I would love to see this natural burial happen but an open field has little appeal and is much as a cemetery minus the headstones."

Shirra Benson via email:

"I'm excited to see that someone has made some leeway on this locally. It's been a dream for me to see this happen near Collingwood. I strongly support this Natural burial ground and it would be pivotal in the way in which we align with nature at the end of our lives. This is much more environmentally friendly.

It gives us an option that doesn't pollute like cremation does

It aligns with Grey Highlands municipal strategy to:

- co-exist in harmony with its ecosystems
- be a community where natural areas are enhanced, forests, valleys are protected
- support alternative business models and social enterprise.

Please allow this to develop :)"

Sue Johnston via email:

"I would like to add my support to the natural burial Ground. This is a non polluting burial at the end of life. I have requested a natural burial as my final wishes and support the concept heartily.

Thank you for your consideration."

Jennifer Base via email:

"I support this ideals natural burial."

Sandra Whittall (Heathcote) via email:

"I am delighted to learn that Grey Highlands is being considered for a natural burial site. I have owned a place in Euphrasia since 1968, and moved here full time about 10 years ago. Now 83, I have done some research on methods and places for my body. I decided that natural burial was what I wanted, but so far there are limited places in Ontario for this method. As you can imagine, I would be first to line up to reserve a spot for natural burial in a site in Grey Highlands. Since we have so many seniors here, I'm sure many would be pleased to have this choice. I certainly urge you to approve this venture."

Sharon Mohr (Holland Centre) via email:

"I live just outside of Berkeley... but wanted to express my enormous support of Natural Burials. When I die, a request for a natural burial will be in my Will. Two reasons for the support:

- simply the green angle out of concern for the harm we are doing the natural world
- the ecological angle where it's almost poetic to think that a body can join fungal filaments in the soil aiding the growth of other types of life

You die yet can actually become part of living earth versus being embalmed and killing the soil surrounding you. Please consider me a fan."

Jeanette Parry via email:

"I would like to write in 100% support of this proposal for a natural burial site. It ticks so many environmental boxes, especially in these days of climate change and continuous assaults on our natural environment. The energy required for cremation is outrageous and the process of embalming and then burial is completely unnatural. This should be the norm, not the exception!"

Robin Speke (Markdale) via email:

"I am very much in favour of a natural burial option for our area and welcome this proposal."

Velga Kalve and Doug Parker (Flesherton) via mail:

"I am writing this letter to let you know how I do not want a cemetery practically in my backyard. It seems highly immoral to be putting dead bodies only 2 feet deep. We have seen bears and coyotes who will dig up the remains. Also at the back of our property is a swamp. The rats will have a feast. What if remains are dug up and parts dragged out by bears, I would hate to have my children and grandchildren traumatized. And who would pay for Doctors. Also when police are called as body parts are found, who pays for damage to fields and crops, also having a cemetery next door will lower our land value. I say NO to such a proposal."

Celina Carter via email:

"I'm writing to voice support for natural burial grounds in our community. It's environmentally safe, fits with our environmental strategy and it brings in new business and jobs for our community. "

Roland and Rosemary Gosselin (Thornbury) via email:

"We are writing in support of the proposal before you to establish a freestanding natural burial site in the Municipality of Grey Highlands. Such a site would reflect the values of Grey Highlands as stated in your Official Plan, as well as those of the upcoming Climate Strategic Plan for the County. Natural Burial not only serves to regenerate the earth, but also to preserve and enhance the eco-systems so vital to us all.

We have expressed our desire to be buried naturally in our wills, and hope that you will vote in favour of the progressive proposal put forward today by Sara Benjamin."

Debbie Honickman, MD (via email):

"I live at the cusp of grey and simcoe county I understand that you are considering a more eco burial option I would be first on the list if this became a reality! In my opinion, there is no longer another choice fir the sake of her descendants. I love the idea that my last act on earth will be to provide the land with nourishment and to ease something for my children, in terms of the burdens they will have to bear as the planet heats up. This past week of heat and drought is another reminder, too. I am a family physician I am aware there will be more pandemics we need to have thoughtful solutions in the future. Please add my name to the people who support this option."

Brian Henderson, Charlene Winger and Sean Winger (Artemesia Glenelg Townline) via email:

"Please register our support for this endeavour."

Holly Trudgeon via email:

"I think the natural burial cemetery would be great for grey highlands, I would definitely consider being buried there myself."

Susan Wismer (Collingwood) via email:

"I am a resident of Collingwood. I'm writing to express my support for a green burial site in our region generally, and specifically in support of the site proposed for Euphrasia. I'm at an age where I am going to need something like this in the next decade or two. I would love to be buried here, on the South Georgian Bay lands that I love, in a way that supports the needs of the people who I love and will leave behind; and the planet. Thanks so much for your serious consideration of this proposal."

Jim Dolmer (Clarksburg) via email:

"I am writing this letter to express my support of the proposal to establish a Natural Burial Site in the Municipality of Grey Highlands. I am a resident of nearby Town of Blue Mountains. We have no such site at this time. Natural Burials are far kinder to the environment than cremation and burials with embalming and concrete vaults. Natural Burials regenerate the earth and preserve and enhance eco systems. We must tread softly on this earth. A Natural Burial is a final, personal act of stewardship. My hope is that you will seriously consider and vote in favour of this proposal."

Jess Arnott (3rd Line A) via email:

"Hi I am writing as I am concerned with this proposal and am located very close to where this is located. We live at _____ 3rd line A. My concerns are around the following:

1. how deep people will be buried
2. understanding as the bodies decay what would that do to our well water? Is there any chance of contamination?
3. How many people can be buried on good property and would amount of visitors will this cause to travel to the area? Our roads have already gotten very busy during the last year covid and with even more people coming to the area I am concerned with the increase of garbage we are seeing left on the side of the road, the speeding taken place on the road and the lack of respect for properties when hiking and hunting.
4. With the depth of the bodies being placed in the ground I am concerned that wild life will dig them up and potentially leave bones around the area. I have two small children that play in the woods behind out property and would not want them to find anything like that.

Thanks any more information would be great"

**Note: Response was provided by providing contact information for applicant to respond to inquiries.*

George Butterfield (Castle Glen) via email:

"We are our both in our 80's and thinking about the end of our lives. We are both very committed to the environment, nature and sustainability. We sponsor and support a Programme at Trinity College, U of T studying these important issues. For far too long our world has become divorced from nature and all supports life on earth. In the past few hundred years we have put concrete and highways at the fore front. We have become distanced from the natural state of our wonderful planet. We clever humans have been steadily destroying so much and polluting the seas and the air as we go. We must restore our world as quickly as possible to it more

pristine state. This will not happen overnight. But why not, at the very least, let some of us go back to nature from whence we came without more damage? We sincerely hope that the Municipal Council will be on the leading edge of this issue and give those of us who want to honour nature, an appropriate place to say our farewell."

Norine Baron (Grey Highlands) via email:

"I want to congratulate you for supporting this initiative. I am totally in support and plan to see what will happen to my body since I have made a commitment to donate it for scientific purposes. I want to avoid any cremation since that is not a "green" option. I live in Grey Highlands but am a member of the Climate Action Now Network in TBM. We have been discussing Natural Burial for the past couple of years."

Richard Frisby via email:

"So how many Suv tanks of fuel will be used to transport the dead bodies and caravans of family members to the burial site from Toronto."

**Note: response provided: "For the actual details of the operation, please contact Sarah Benjamin. I have cc'd her on this reply. In relation to this request, the role that the Municipality has in regard to this request is as per the Provincial legislation being the Funeral, Burial and Cremation Services Act, 2002 being that a local municipality that receives a request for an approval to establish a cemetery in the municipality shall grant the approval if, in the municipality's opinion, it is in the public interest." Council is currently accepting comments from the public and will consider the comments received in order to make their determination if it is in the public interest."*

Shirley Daly via email:

Email 1: "Where can we access information on this proposal....number of bodies buried, over site of operation, traffic on this goat path of a road, road regulations and improvements for this. It is hard to comment without this being easily accessed."

**Note: response provided: "All cemeteries are overseen by the Bereavement Authority of Ontario. For specific questions about this operation, please contact Sara Benjamin. I have cc'd her in this reply."*

Email 2: "Thanks for that. Can you clarify where the municipality involvement on this begins and ends....roads and traffic in particular."

Email 3: "Not sure if you received this question. As a tax payer and long standing community member I would like to know what over site or restrictions the municipality would have in place to fulfill its role as our governing body."

**Note: Responses provided: "In relation to this request, the role that the Municipality has in regard to this request is as per the Provincial legislation being the Funeral, Burial and Cremation Services Act, 2002 being that a local municipality that receives a request for an approval to establish a cemetery in the municipality shall grant the approval if, in the municipality's opinion, it is in the public interest." In relation to roads and traffic, all municipal roads are under the jurisdiction of the Transportation department and are maintained according to standards in place regardless of what types of operations are located there. For specific inquires*

*related to road operations, please contact the Transportation department
lemonh@greyhighlands.ca*

History of Natural Burial Application:

Council received a delegation on February 17 from Sarah Benjamin and Susan Green requesting approval to move forward with their plan. Their delegation materials can be found here: [594D41B3B08C4ED599783C6AC42D8BBF-natural burial power point Final Draftv2.pdf \(civicweb.net\)](#)

On May 5, 2021 staff prepared a report to Council outlining the role that the Municipality has in relation to such requests. The report presented to Council can be accessed here: [Natural Burial Proposal in Grey Highlands \(civicweb.net\)](#)

Staff are currently compiling all comments received and will present them to Council on June 16, 2021 in order for Council to determine whether this is in the public interest, which is currently their role under the legislation. If you have any further questions, please reach out to me directly at clerk@greyhighlands.ca."

John Butler sent letter via email:

Please see attachment (p.19/35).

Gloria Kropf Nafziger via email:

"I was very excited to hear of conversations taking place in grey highlands about the possible establishment of a natural buried site. It is my hope that this conversation includes your neighbours in my town Collingwood. I stand in solidarity and in anticipation of sites such as the one proposed being established for my own and others use in the next decades."

Nadia Pestrak (immediate neighbour) via email:

"I am located beside Sara and Clay's property -- the individuals who wish to have a natural burial site on their property. I wish to express my support. I trust the rigours of the process and the the NEC in determining whether this should or should not proceed. Philosophically, the concept makes great sense to me. As a very close (in proximity) neighbour, I am not concerned about traffic, water quality, or property value. My only concern is ensuring that the original spirit and plan for the burial does not change should Sara and Clay no longer have ownership of the property (e.g., it's not suddenly a 30 acre burial ground etc or a crematorium isn't added in etc). Thanks for seeking input."

Wayne Shier via email:

"Please accept this email in hopes that Grey Highlands Council will determine that this proposal is NOT in the best interests of the public. Despite that I personally find the proposal morally reprehensible I suppose each to their own, however, in my opinion, if you approve this proposal it will become an accident waiting to happen. In my research, I have discovered that this property falls under the jurisdiction of the NEC and Grey Sauble Conservation Authority. I would be astounded if either of these authorities granted permission for this proposal to proceed. According to OMAFRA's AgMaps portal the property soil type is Osprey Loam. The Natural Drainage of Osprey Loam is well with a Moderate Hydrologic Group. This by definition can lead to possible groundwater contamination relatively quickly. Ag Maps also indicates that the property falls within the following watersheds: Quaternary Watershed - Beaver River Outlet

Tertiary Watershed - Southwest Georgian Bay

Secondary Watershed East Lake Huron

Property is designated as part of the Grey Sauble Source Water Protection Area.

There are several private water wells and surface water close to this property.

A small part of this property is designated as a Significant Groundwater Resource.

The recharge area is a Highly Vulnerable Aquifer.

In the interest of protecting our drinking water - please do not support this proposal.

I have been conducting online research to try and find out if there is any legislation regarding this proposal. I am unable to find anything.

From an agricultural perspective there are regulations addressing the disposal by on farm burial of deadstock.

With regard to an individual carcass:

You can not bury in a designated floodplain.

You are required to maintain a certain distance from bedrock

You must bury six (6) feet deep to discourage predation.

There are other regulations that address a mass burial site.

The provided documentation for the proposal indicates that the bodies will be placed a minimum of two (2) feet below the surface by law.

The law, which I am unable to reference, is woefully inadequate. As the bodies decompose the soil cover will settle. Additional soil will need to be added to maintain the two (2) feet.

I can guarantee that bodies with only two feet of ground cover will be discovered and dug up by coyotes, dogs, and other wildlife. Council will be dealing with partially decomposed human remains and human bones as predators drag them across neighbouring properties and Euphrasia township.

I am unable to offer what an acceptable depth would be other than to say six (6) feet seems to solve the problem with deadstock.

I implore Grey Highlands Council not to support this proposal.

Protect our Water Resources from potential contamination.

Protect and Respect our dead. When they are laid to rest that they truly be laid to an undisturbed rest.

In my humble opinion, I truly do believe this is a nightmare waiting to happen."

Patricia Ellingwood via email:

See Attachment (p.22/35)

Nicholas Clayton (Blue Mountains) via email:

"I am a 45 year old school teacher and resident of The Blue Mountains. I support the natural burial cemetery being proposed by Sara Benjamin. When I die, this is the way my body will be buried. This method is in line with my values, as it honours my concerns about the environment and climate change. I do not want to be chemically preserved, I want to quite literally return to the earth. I envision those who survive me coming to visit a natural space, and knowing that I am not under a headstone, nor am I anywhere in particular at all, thus I am everywhere."

Roy Dormany (abutting property owner) via email:

"We own a property partially abutting the proposed site. Most of my comments were brought up during the zoom information session held on May 26. The presentation

and especially the comments and concerns raised during the meeting should be included as comments, as I will be repeating many of the points brought up. I am concerned with property values in the area. The quiet enjoyment of the existing properties could be impacted and may result in reduced values due to increased traffic both vehicular and pedestrian. Proper insurance coverage for the area needs to be considered not only for the designated burial site, but the possibility of visitors wandering off the site onto a neighbour's property and injuring themselves. If delineation is to be used will it be sufficient to eliminate insurance concerns and handle a general increase in traffic. Proper environmental studies should address environmental concerns with the local area including potable water wells, streams/rivers and designated wetlands nearby. Applicable government agencies such as the Niagara Escarpment Commission should be involved."

Tom Burns (Craigleith) via email:

"We are full time residents of Craigleith and really like this idea."

Shirley Daly (Duncan) via email:

"Do we want a natural, green or otherwise cemetery smack dab in the middle of a residential/rural road in Duncan? This is a privately owned, for profit business proposal. The applicant has generously provided us with very interesting environmental, spiritual and philosophical information in regard to this proposal. However, it is a distraction from the real issue our community must consider. This is an irreversible reallocation for the use of this property. There is no option for a council meeting in the future to amend this decision. This fact alone makes our individual deliberation so important.

Are we being complacent because we believe this site will not increase beyond the small amount of usage data based on information provided? What if this changes? I have many concerns regarding the proposal put forth for a cemetery site in Duncan. They are as follows:

1) Number of Bodies to be Buried.

a) How many burials are proposed....100, 1000, 10,000?

Is there a formula per acre that will be adhered to?

Is there a cap or limit on the number of bodies to be buried?

Will this calculation be market driven?

Is this site contained to the 5 acres described in the presentation or is this site able to expand in the future? Is there a maximum acreage allowed?

Phrasing such as unlikely, usually or typically cannot be acceptable when considering the full scope of the ramifications of this project.

We have been informed that to date, the busiest burial site typically accommodates 6 burials a year.

As the popularity of this type of burial increases, what happens if the Duncan site catches on? With close proximity to a large market such as Toronto, this may become a busy place. The applicants have already stated that dead people will travel to be buried here from away.

2) Burial Depth

a) Frost levels can occur four feet down in this area. We all know what frost can heave up out of the ground.

b) The reference that states that bodies will not be dug up or disturbed by animals may or not may not be accurate.

3) Ground Water Contamination

How will decomposing bodies effect the water table and surrounding wells of neighbouring properties? Does the municipality demand peer reviewed environmental impact studies for this concern? Who is liable for any contamination that may occur....the applicant or Grey Highlands for approving this business proposal?

4) Zoning

a) This site will now become zoned for a commercial, open to the public graveyard if approved. This is forevermore folks!

b) What happens if the property is sold? Will this bring the opportunity for more amendments to the use of this property?

c) If this property should become abandoned, then Grey Highlands would take over the management of this enterprise. We have present day examples of the complexity of the issues that occur when the municipality has to take back public/commercially operated property.

5) Operational Regulations for Burial Site

a) Is the site regulated with hours of operation?

b) Will the site be secured not only from the entrance but neighbouring properties?

c) Will the site be open to the general public?

6) Increased Traffic

a) This has the potential to become a busy road servicing funeral processions. We have been informed that typically the funeral gatherings are intimate with only family and friends. Again, there is really no way to guarantee this with either the amount of people in attendance or the number of burials that will eventually be taking place.

b) This is a narrow road. Will the applicant guarantee parking within the property and not on the roads.

We are plagued with so much traffic on our neighbourhood roads with very dangerous bottlenecks from parking with little or no intervention from authorities. We only have to think of Old Baldy, Duncan Caves, Metcalffe Rock, Kolapore and every Bruce Trail access point. To date, we have had two fatalities in our regions on roads congested with side of road parking.

c) Who pays for upgrading the road to accommodate this site if need be? The applicant or the tax payer?

Finally, times in our community are changing. We are no longer made up of farmers and residents. It appears the trend today is for some new residents to move to rural communities seeking innovative opportunities to make a living and in the process change our cultural landscape as we try to adapt to their values/business plans. There is nothing inherently wrong with this. However, some business plans are more intrusive to the existing community than others.

I understand and respect that this proposal is in the beginning stages as stated by the applicant. Regardless, the questions as outlined must be answered with certainty in the very beginning stages before this goes any further."

Brian Damude via email:

"I think Shirley Daly's observations on the Burial site in Duncan are excellent!"

Richard Frisby (Duncan) via email:

"I Richard Frisby am opposed to the Natural Burial proposal located in the community of Duncan along The Blue Mountains-Euphrasia Townline. This property is on the Niagara Escarpment which is designated as a World Biosphere Designation.

This property is considered Escarpment Natural and Rural and it is not for a commercial operation. This property if considered should be subject to all environmental impact studies and land use controls.

This property and surrounding properties have existing wetland designation as well. One of the conditions of any burial site or Cemetery in Ontario is as follows: they should not be allowed "on or near a Wetland."

Grey Sable Conservation Conservation authority must review this concern. The Ministry of the Environment must also sign off on these potential contamination issues. Have any of these studies been done to date?

This burial site and decomposing of bodies could affect the adjacent wetlands or river tributaries (Mitchell Creek Valleys) of adjacent lands. The proximity of the Duncan Escarpment Provincial Nature Reserve and two ANSI areas could over time have detrimental effects. This is a huge risk. MOECC enforces applicable legislation pertaining to water quality in the Park and adjacent lands. Also how will the decomposing bodies affect the water table and surrounding wells?

Another concern is more road traffic and noise that will follow in an area already experiencing increased demand due to the close proximity of Duncan Caves, Old Baldy Conservation Area, Bruce Trail access points, Kalapore Uplands Management Area and Metcalfe Rock. Our roads are hazardous and not constructed to have another influx of car congestion.

The proposal appears to Greenwash the activity (the burial), suggesting that there is considerable savings (fuel to fill up SUVs) by not practicing the cremation the bodies. However, there is no mention of the potential amount of fuel needed to transport the bodies and family members and friends from as far away as Toronto and all of Ontario to the proposed site.

In closing I would like to again disagree with this proposal, on the grounds that it doesn't enhance the community of Duncan. This is not the growth in tourism we all want. This is one and done tourism. No repeat business."

Simon Frisby via email:

"I would like to voice my concern for the proposed burial site in the Community of Duncan. The letter my mother Shirley Daly wrote outlines exactly what I too am concerned about and the questions associated with such a proposal. I have copied and pasted the letter she has written."

*Note: see submission from Shirley Daly above

Cathy Griffin via email:

"I just read an article about the proposed natural burial site in Duncan. This sounds fabulous!"

Paul Woods via email:

"I am all for it. Please accept this."

Heather Baker (Singhampton) via email:

"I am delighted to hear that the option for a green burial is being considered here. I have a plot in the Singhampton Union Cemetery, But they insist on a vault despite bereavement Ontario requiring an vault less option to be available. I wish to decompose....without a vault. And without preservatives. And so encourage you to find a way to allow for a natural burial."

Roger Short (Clarksburg) via email:

"Sue Short and I are in favour of this option."

Jane Litchfield (just outside of GH) via email:

"I live just outside Grey Highlands, but wanted to let you know I approve of the natural burial proposal and would like to see more of these."

Elizabeth Dingman (GR 12) via email:

"I just wanted to drop a quick note in support of the Natural Burial Cemetery proposed for the BM Euphrasia Townline. This is a service that I fully believe in, which fills a real need for people looking for alternatives from the current cemetery services offered. I sincerely hope that the Council sees the merit in this proposal and passes it without hesitation."

Shelly Sheard (Flesherton) via email:

"I'm very much in support of the Municipality approving the establishment of a Natural Burial Cemetery within Grey Highlands. I have been looking into natural burials and would love to see one in our municipality to give us a wider choice of funerals."

Monica Hills (Chatsworth) via email:

"My husband and I would like to have a natural burial when our time comes."

The thought of being burnt to ash when we are gone horrifies us.

Many people choose cremation but, we don't believe that they are aware of how much it pollutes our air.

We chose to be buried in a cemetery as that was the only other option.

Then we heard of natural burial it made us so happy the thought of being able to give our bodies to nature to the ecosystem to let our bodies be buried in the woods with the trees and the plants makes us so happy. We don't want or need a silk lined coffin with a little pillow and makeup put on our faces that will not make us look like who we were.

Wrap us in a shroud and give us to the Earth that's all we ask. Knowing that our last resting place can be in the wilderness would be the best part of having to die.

Please allow this in the Grey Highlands where we can enhance our natural areas.

Where our communities forest's and valleys are protected. Where we can co-exist

with the ecosystem. What more could we ask for. You will make so many people so very happy."

Jim Phillips (The Blue Mountains) via email:

"As a resident of Blue Mountain Township – 495667 Grey Rd 2, Ravenna - I fully support this proposal and was considering doing this on one of my properties. Having a more environmentally responsible burial option would be a very progressive step for our township and help pave the path for other townships to do the same. I would also support this financially. Thank you for the opportunity to comment."

Voika Glazar via email:

"In regards to the proposed Natural Burial Cemetery in the County of Grey, the Municipality of Grey Highlands, please take notice that Natural Burials are offered in Municipal Cemeteries, City Cemeteries and community owned Cemeteries in Grey County and elsewhere. They are existing Cemeteries that have a separate area for Natural Burial options. Greenwood Cemetery is owned and operated by the city of Owen Sound is one of those examples. The Natural Burial area is left in a natural state, with trees, native flowers and wildlife. Other examples are in the Town of Holstein, in the City of Guelph and many others who offer this service. Municipality of Grey Highlands currently owns seven (7) active cemeteries sites, with some offering natural burial and sixteen (16) inactive cemeteries. Is there a need for another cemetery?"

Andrea Matrosovs (Blue Mountains-Euphrasia Townline) via email:

"Thank you for your notice mailed to me as neighbour. We live on the small 2-acre parcel directly across the road in the Town of the Blue Mountains from the subject property. We have to object based on the lack of information at this point in time. Those of us who live in Egypt in both Grey Highlands and the Town of the Blue Mountains have questions and need to have all of the information first before making a comment about a natural burial cemetery in principle.

1. What is the comment from the Niagara Escarpment Commission (NEC)? I understand institutional use may be permitted in Escarpment Rural Area according to the 2017 NEC Niagara Escarpment Plan (Section 1.5.3, page 26), but the definition of the use includes that it is "to serve the immediate community" (page 152). What therefore is the scope of the "immediate community" to use this proposed service? Does this mean the service may only be run as not-for-profit versus commercial use and have limitations to the number of burials?

2. What is the comment from Grey Sauble Conservation Authority (GSCA)? Please identify if the proposed 5 acres is in any part on hazard land identified by GSCA.

3. What is the exact location proposed for the 5 acres within the 100 acre parcel? Please provide a proposed location map on this subject property to all neighbours. This is a vital piece of information because may or may not have a bearing on direct neighbours' comments or comments from other residents in the Egypt and Duncan communities.

We did not participate in the information session organized by the applicants because my father was dying at the time and in fact died on Sunday. This is a challenging topic for our whole family at the moment in our bereavement. We do not disagree with the principle of natural burial, but until the above information can be reviewed by neighbours, my family must regrettably object to the proposal based on the limited information in the notice. I would ask that you extend the invitation for comment once the above information can be shared publicly with neighbours and our local communities."

Additional Comments:

The Town of The Blue Mountains

The Town of The Blue Mountains was circulated late and will be reviewing the notice at their meeting on June 14th. Staff will touch base with The Blue Mountains staff to obtain input for a verbal response at the meeting on the 16th. Any written comments received by The Blue Mountains will be attached to the minutes of the meeting on the 16th.

Niagara Escarpment Commission (NEC)

Although not included in the circulation, staff have been in contact with NEC as they had received inquiries from residents after the circulation went out. Comments received from the NEC are attached (p.24/35). It is the understanding of the NEC that under Section 24(3) of the Niagara Escarpment Planning and Development Act provides that no approval, consent, permission or other decision that is authorized or required by an Act and that relates to development shall be made, in respect of any land, building or structure within an area of development control, unless an NEC development permit has been issued."

Sara Benjamin - Requester

Sara Benjamin and her husband held a zoom meeting to address concerns raised by members of the community. She has provided a summary of the meeting which is attached (p.26/35).

Bereavement Authority of Ontario (BAO):

Staff requested clarity from the BAO related to the order of approvals. It was clarified that "once Municipal Council approval is received and the notice of decision is published etc. then the applications to the Bereavement Authority of Ontario must be submitted." The BAO was unable to provide clarity on whether the Municipal approval or the NEC approval would come first as they have no involvement with the Municipal approval processes, however they indicated that the applicant can not begin the application process with the BAO until they receive a notice of decision from the Municipality.

Update:

After this initial report was created, additional comments continue to come in however those comments received after the comment deadline of June 4th are not referenced in the report.

Staff were able to obtain clarity from the Bereavement Authority of Ontario that Council can delay providing the final decision required under the FBCSA until after all impacts have been researched, reviewed and accepted by the various approval bodies.

The applicants have requested that Council provide some indication of whether they would approve the idea in principle before they proceed with the other levels of approval. The recommendation in the report reflects this and does not provide for the final approval required under the FBCSA at this time.

OPERATIONAL CONSIDERATIONS:

Option A: Approval in Principle Only and Final Considered after Receipt of Regulatory Approvals

In the opinion of staff based on the comments received, there is overwhelming public interest to locate a natural burial ground in Grey Highlands. Due to the concerns raised in the comments related to the NEC development process and associated legislation, staff are recommending that Council approve the natural burial in principle only at this time. Final approval required under the FBCSA would be conditional on the applicant obtaining a permit from the Niagara Escarpment Commission and any other relevant approvals required. This would let the applicant know that the Municipality would be on board should all the environmental and development aspects of the proposal be

approved and ensures that all relevant planning and environmental issues have been addressed prior to the Municipal providing final approval.

Should Council choose the recommended option, Council can move the recommendation in the staff report. No notice of decision would be released at this time, as it would be an approval in principle and not the final approval required under the FBCSA. Once Council makes a final decision after all regulatory approvals are in place, then a notice stating the reason for the decision would be sent to the Registrar, the owner and published in the newspaper.

Option B: Denial

Should Council determine that a natural burial ground is not in the public interest for Grey Highlands, Council can move the following alternative motion:

That Council receive staff report CLS.21.22 ;and

That Council determines that the addition of a natural burial site in Grey Highlands would not be in the public interest; and therefore

That Council of the Municipality of Grey Highlands does not grant approval under section 84 (1) of the Funeral, Burial and Cremation Services Act, 2002 for a natural burial site to be located on the property known as 355310 Blue Mountains Euphrasia Townline.

Should Council not grant the approval, Council must state the reasons for their determination as they are required to be referenced in the notice of decision to be sent to the registrar, the person making the request and published in the newspaper.

Option C: Deferral

Should Council prefer to wait until the applicant has obtained a development permit prior to making a decision on public interest, Council can move the following alternate recommendation:

That Council receive staff report CLS.21.22 ;and

That Council defers any decision for a natural burial site to be located on the property known as 355310 Blue Mountains Euphrasia Townline until such a time that all regulatory approvals have been obtained.

The reason that staff are not recommending this option as it does not provide any indication to the requester whether there is any initial merit in moving forward with the planning and development stages. Should Council recommend this option, the requester may end up putting substantial time, effort and financial resources into a plan which may not even be permitted within the Municipality.

Conclusion:

Regardless of the option that Council chooses, any final decision that is made by Council is appealable under the FBCSA.

GREY HIGHLANDS STRATEGIC PLAN:

Considerate Communities - Provide timely and relevant communications with residents, businesses, and local community groups to create ongoing public conversation.

COMMUNICATION POLICY:

The notice of decision stating the reasons for the decision will to be sent to the registrar, the person making the request and published in the newspaper.

STAFFING IMPACT:

There would be no staffing impact related to a decision on this application. The staffing impact up to this point has included the time to prepare the circulation, respond and compile the comments, and research the legislation. Total time invested in this by staff to date is approximately 20 hours.

POLICIES/LEGISLATION::

Funeral Burial and Cremation Services Act, 2002
Niagara Escarpment Development Act

CONSULTATION:

Staff obtained clarification from the Director of Planning on making the approval conditional on obtaining the NEC Development Permit.

FILE OR REFERENCE:

Attachment 1: Letter from John Butler - page 19/35
Attachment 2: Letter from P. Ellingwood and D. Swindell - page 22/35
Attachment 3: NEC Correspondence - page 24/35
Attachment 4: Sara Benjamin Summary Document - page 26/35

Approved By:

Raylene Martell, Director of
Council and Legislative
Services/Municipal Clerk
Karen Govan, Chief
Administrative Officer

Status:

Approved - 04 Jun 2021

Approved - 07 Jun 2021

Members of the Council of the Municipality of Grey Highlands:

I respectfully request that Council approve in principle a proposal for a natural burial ground in Grey Highlands, recently submitted by Sara Benjamin. I ask you to support it for three reasons:

- Expanding the range of burial choices for Grey Highlanders
- Minimizing the environmental impact of burials
- Adding a new business to Grey Highlands.

Expanding the range of burial choices for Grey Highlanders

I respectfully suggest that as a general principle, any action taken by the Municipality to expand the range of legal life-choices for residents of Grey Highlands, consistent with the safety and wellbeing of all residents and consistent with the municipality's fiscal well-being, is a desirable action. The choice of natural burial in their home town is not available to residents of Grey Highlands at present, no provincial or federal law prevents it, natural burial does not threaten the health or wellbeing of anyone in Grey Highlands, and the Municipality incurs minimal or no costs related to the creation and operation of a natural burial ground in Grey Highlands.

Minimizing the environmental impact of burials

Compared to other forms of burial, natural burial has the least deleterious environmental effects. It does not leave residual embalming fluids in the ground, and its natural landscaping does not add the greenhouse gases to the atmosphere that traditional lawn care machinery produces. The carbon footprint that results from the manufacture of conventional caskets and from the quarrying, transportation and installation of conventional stone grave markers is eliminated, since natural burials use biodegradable coffins of wood or cardboard or biodegradable shrouds, and there are no individual headstones in a natural burial ground. About the only greenhouse gas source during the operation of the natural burial ground would come from the machinery necessary to excavate and fill the grave sites.

Natural burial adds nutrients to the soil and as the natural landscaping matures – aided by these nutrients – the property adds to the carbon sink capacity of Grey Highlands (i.e., its capacity to absorb and store atmospheric carbon in vegetation). And while the grass in cemetery lawns absorbs carbon too, the absorption is more than cancelled out by carbon emissions from grass-cutting machinery and from the manufacture and distribution of lawn fertilizers and pesticides.

Cremation, an increasingly common form of body disposition of remains, has one major environmental drawback: the high temperatures required to incinerate a body, and the energy required to reach those temperatures. As Calgary's Cooperative Memorial Society puts it:

"Cremation has become a more popular alternative to burial. However, cremation is not without an impact on the environment and as a result 'Green Burials' are now looked into as a further alternative. Crematorium furnaces combust at very high temperatures, 1590-1797 degrees Fahrenheit or 870 - 980 degrees Celsius, and it takes at least an hour to incinerate the body. The burners can range in power from 150 kW to 800 kW. Most furnaces are run by natural gas. The air supply is controlled. A 68 kg body which contains 65% water will require 100 MJ of thermal energy before any combustion will take place. This is equivalent to 3 cubic metres of natural gas or 3 litres of fuel oil. Additional energy is necessary to preheat the furnace. The furnace is lined with refractory ceramic bricks and to produce them requires lots of energy and materials."

Research suggests that a North American cremation produces an average of 534.6 pounds of atmospheric carbon dioxide.

In short, Municipal approval of a natural burial ground is a small contribution – but a contribution nonetheless – to prudent environmental protection and to curtailing global warming.

Adding a new business to Grey Highlands

Encouraging the development of a business with positive environmental impact – a business that requires little or no municipal infrastructure to support it – would seem to make sense. And in the case of a natural burial ground, the market area for the service includes, but is larger than, Grey Highlands. This is because surrounding communities do not have natural burial grounds. Owen Sound has an area in Greenwood Cemetery for natural burial but it has not been naturalized. Proponents in West Grey have started examining the feasibility of natural burial, but this project is at a very early stage. Interested parties in the Northern Bruce Peninsula are also beginning an investigation. Of the four existing natural burial grounds in Ontario, the closest to Grey Highlands is in Waterloo. Of the 14 places in Ontario contemplating natural burial sites, only West Grey and Owen Sound (mentioned above) are close to Grey Highlands, and none of the 14 sites are in the Simcoe County-Southern Georgian Bay area, whose populations in Collingwood, Wasaga Beach and adjacent areas could be considered to lie within the “market area” for a natural burial ground located near the eastern border of Grey Highlands.

Conclusion: Some Challenges

While I express my support for the natural burial proposal currently before Council I am not naive enough to believe the approval and creation of this resource does not involve challenges, nor am I informed enough to know what all those challenges are. However, I cite two of the challenges, expressed as questions, below:

- ***Rather than having a site exclusively for natural burials, would it not make more sense to designate part of an existing cemetery as the Grey Highlands natural burial area?*** When I first heard of the proposal before Council, I wondered if this “add on” approach might make more sense. But even my cursory examination of natural burial sites suggests that there is a tension between conventional burial sites and natural burial sites. Conventional sites are manicured and neat. Natural burial sites are not manicured. They are messy (nature is messy) and in the eyes of some, merely a weedy eyesore. It seems that burial grounds that include both types of burial areas reconcile the tension by screening off the natural burial area, as if it were a slightly disreputable relative of the much more respectable conventional burial area. People choosing natural burial might want something better than that. They might want to be buried in an unapologetically natural site, where the whole site lives up to the environmental ethics and principles inherent in natural burial.
- ***Are their issues of liability and propriety inherent in a burial ground that is privately owned?*** What are the implications in terms of liability and future use of the property if its owners decide to sell it to a buyer who doesn’t want to own a burial ground? Can the municipality require all or part of the property to be respected as a burial site (even if it is closed to future burials) no matter who owns it?

It is likely that there are other challenges as well, and I hope the Municipality would not reject the proposal outright just because it poses challenges.

John Butler, May 26 2021

I would also respectfully suggest that any process to identify and deal with these challenges should include the municipality, the private sector (including the proponent of the natural burial ground and landowners likely to be affected by the site) and the civic sector (including environmental groups within Grey Highlands, the Natural Burial Association and possibly faith community representation).

If challenges are resolved, Grey Highlands could well be the host community for a unique environmentally friendly resource and green business that meets the afterlife needs of those people in and beyond Grey Highlands who believe environmental responsibility does not end at the edge of a grave.

Respectfully submitted
John Butler, Port Law, Grey Highlands

Please note: I have no financial or other personal interest in the proposal before Council, and my contact with the proposal's proponent has been limited to seeking information for a newsletter article about the proposed natural burial facility.

Subject: Concerns related to *Natural Burial Cemetery request at the June 16, 2021 Council Meeting* as requested by Grey Highlands Municipality by June 4, 2021

Letter to Council

We are requesting that Council fully investigate the concerns of local and neighbouring residents while determining Public Interest for the application for a Natural Burial Cemetery at 355310 Blue Mountains Euphrasia Townline. While there is no direct opposition to the concept of natural burial in a local previously designated area, such as a section of the Markdale cemetery, we have a number of concerns with the development in a residential and agricultural environment.

- According to the proposal summary, bodies will be buried at a depth of 2'
 - [According to the My Water Earth, the canine olfactory system works so well that dogs can pick up scents that are diluted to 1 or 2 parts per trillion; This allows them to smell things buried as far as 40 feet underground!](#)
 - The recommended depth for burying a pet in a rural environment is 3' to mitigate scavenging by wild animals. See recent game camera photos, captured on an adjacent property to the proposed site, of a black bear and coyote pack.
 - What about rats? Rats can tunnel up to 10' for food or burrow.
 - What happens in the case of an exhumation and transfer to adjacent farm properties by wildlife? Who is responsible for crop damage pending any investigation?
- Who is a candidate for natural burial? Will people who were exposed to chemo/radiation/sedation by heavy narcotics at end of life be admitted? How will that effect the soil/water?
- Drinking water concerns for local residents. Although the Natural Burial Association claims "Careful planning goes into natural burial site selection with standards such as a 250m setback from wells, and a 1m buffer above groundwater to disperse fluids into the ecosystem. Natural burial graves have an additional advantage over modern graves for dispersing fluids as they are shallower (2-3 feet/1m vs. 5-6 feet/2m) and are typically surrounded by the natural vegetation of forests or meadows. This keeps the body well above groundwater sources...". The proposed site is located on potential Karst topography in the Niagara Escarpment Commission zone that drains into the Beaver Valley below. See attached video of water draining into the fractured bedrock on an adjacent property (within the 120m setback). As per the [Ontario Ministry of Agriculture, Food and Rural Affairs FactSheet Agdex#: 729/400, Deadstock Disposal Options for On-Farm](#): "Burial is not permitted in areas where the bottom of the burial pit is less than 0.9 m above bedrock or an aquifer." Do these regulations apply to the proposed Natural Cemetery? Will Karst topography testing be required?
- In regard to the claimed mitigation of carbon release and climate change, a natural burial cemetery has the potential to have the opposite effect. According to current studies at the University of Guelph - School of Environmental Sciences, that compare carbon sequestration rates across woodlots, ag biomass and conventional agriculture, woodlots are the most effective in sequestering carbon in the soil. This effective sequestration of carbon is dependent on the soil remaining undisturbed. If the soil is disturbed (i.e. dug up for burial plots), the carbon is released back into the atmosphere and the carbon cycle is broken. Further to this, the Natural Burial Association claims that the fuel required to cremate one body is the equivalent to the

amount of fuel it takes to fill an SUV twice. In a situation where a person from outside of the area desires to be buried in the proposed location, there is potential for more than two vehicles to attend the funeral as well as subsequent visits to the site over time. It is not difficult to anticipate that this scenario would result in the use of more than two SUV tanks of fuel.

- Who decides when the cemetery is at capacity? What is the estimated number of bodies to be interned at the site and over what period of time?
- Has the effect on value of neighbouring properties been considered?
- Neighbouring properties are in agriculture for food production.

While there is no objection to the proposal in concept, we respectfully request Council consider that there is no public interest for a natural burial cemetery *on the proposed site*.

Respectfully submitted,

Don Swindell and Patricia Ellingwood

Vinegar Hill Farm (vinegarhillfarm@gmail.com, 519 599-7191)



Niagara Escarpment Commission

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Niagara Escarpment Commission
An agency of the Government of Ontario

SENT VIA EMAIL ONLY

June 4, 2021

Raylene Martell
Director of Council and Legislative Services/Municipal Clerk
Municipality of Grey Highlands
206 Toronto St. South, Unit 1
PO Box 409
Markdale, ON
N0C 1H0

Dear Ms. Martell:

Re: Municipality of Grey Highlands Notice of Consideration for a Natural Burial Cemetery

Niagara Escarpment Commission (NEC) Staff are aware of the above noted Notice of Consideration (dated May 10, 2021), seeking public input on a proposal for a natural burial cemetery on the subject lands at 355310 Blue Mountains Euphrasia Townline, Grey Highlands. Staff is of the understanding that information being collected through the Notice of Consideration is to be presented to Council in a Staff Report for consideration at their June 16, 2021 meeting. It is Staff's understanding that the proponent is seeking a "request for approval", in the form of an agreement in principle from Council to support the creation of the cemetery.

Please be advised that the proposed cemetery lands are within the Niagara Escarpment Plan (NEP) Area, and within the Area of Development Control. The lands are designated Escarpment Natural Area and Escarpment Rural Area. The lands appear to contain natural heritage features (wetlands, woodlands and watercourse). The proposal for a cemetery is considered development under the Niagara Escarpment Planning and Development Act (NEPDA) and as such would require a NEC Development Permit. Section 24(3) of the Act provides that no approval, consent, permission or other decision that is authorized or required by an Act and that relates to development shall be made, in respect of any land, building or structure within an area of development control, unless an NEC development permit has been issued.

The landowner (the proponent) for this proposal was in contact with NEC Staff in January of this year seeking "support in establishing a green/natural burial cemetery" and was advised at that time by Staff of the need to file a Development Permit Application with the NEC. No application has been made to date. The principle of the

use must first be assessed through the NEC Development Permit Application process, including a determination as to whether the proposed use meets the definition of Institutional Use in the NEP, and if the use is a permitted use under the applicable land use designation(s). If determined to be a permitted use, an assessment of the proposal against the applicable Development Criteria of the Plan would also be required.

Staff is therefore advising that it is premature for Council to be making any decisions or granting any approvals on this proposal, prior to the NEC considering the proposed development through a Development Permit Application. Should a Development Permit Application be submitted to the NEC, the proposal would then be circulated to the municipalities, Ministries, and agencies seeking comment.

Should you wish to discuss this matter further, please contact Lisa Grbinicek at 289 839-0304.

Regards,

A handwritten signature in black ink, appearing to read 'Debbie Ramsay', with a stylized flourish at the end.

Debbie Ramsay, RPP, MCIP
Director, Niagara Escarpment Commission

- c. Commissioner Paul McQueen
Commissioner Duncan McKinlay
Michael Benner, Director of Planning & Building Services, Municipality of Grey Highlands

June 4, 2021

Dear Councillors and Municipal Staff Members,

I am buoyed by the overwhelmingly positive response to the idea of establishing a natural burial cemetery in Grey Highlands. I have heard from both nearby neighbours and from community members further afield.

These responses have validated the need for this in our community and have solidified my commitment to endeavour to deliver this service.

My husband and I held a zoom meeting for our Duncan community members and for others that had reached out with questions through the clerk. We took the opportunity to address questions that were raised during the meeting, and to answer questions that had been directed to the clerk and forwarded to us.

I am attaching a summary of those questions and answers for you, to help inform your decision on June 16th.

I thought the council would appreciate seeing the comments from people who took the time to let the Natural Burial Association (a non-profit volunteer organization) know why natural burial appeals to them.

I have isolated only the comments from those in the NOC and NOH postal code zones.

The Natural Burial Association did not receive one negative comment, only one query about gas mileage.

I am hopeful that I will be able to deliver to our community a new kind of cemetery, an alternative option that is taking the US and UK by storm, and an idea that is clearly anticipated with enthusiasm in Grey Highlands.

This business concept not only aligns with the township's environmental stewardship objectives, it also supports alternative business models. In passing this motion, council will be giving the community an option of an eco-friendly goodbye.

Warmly,



Sara Benjamin



A Natural Burial Ground in Grey Highlands Answers to Questions Raised by the Community

Submitted by Sara Benjamin
benjaminsara34@gmail.com (705) 443-9038

WILL OUR WATER BE TAINTED WITH DISEASE? WILL LIQUIDS FROM THE BODY SEEP INTO THE WATER?

The graves in natural burial grounds are designed to take advantage of how water moves through the eco-system. For rapid decomposition, the body is buried closer to the surface (approx 3 feet rather than the conventional 6+ feet). There must be one metre distance between the body and the water table. No grave can be within 75 metres of a potable water source. The legislation governing cemeteries ensures that no cemetery is approved without the above restrictions in place. These measures provide extra protection. The main avenues for decomposition fluids to cause illness are that of fluids contaminated with prions (misfolded proteins which can cause transmissible spongiform encephalopathies; TSE) or fecal matter containing E. coli entering water systems. The ability for these pathogens to travel through soil and infect other organisms is severely limited due to their tendency to either bind to soil particles or be broken down (Bartelt-Hunt and Bartz 2013). Today, natural burial is practiced among many, for instance both the Jewish and Muslim faith, as well as any individual that does not embalm or purchase a vault. Livestock and pets are also buried naturally. To ensure that the proposed site complies with the above, a hydro-geological study will be initiated.

WILL THE ANIMALS DIG UP THE GRAVES?

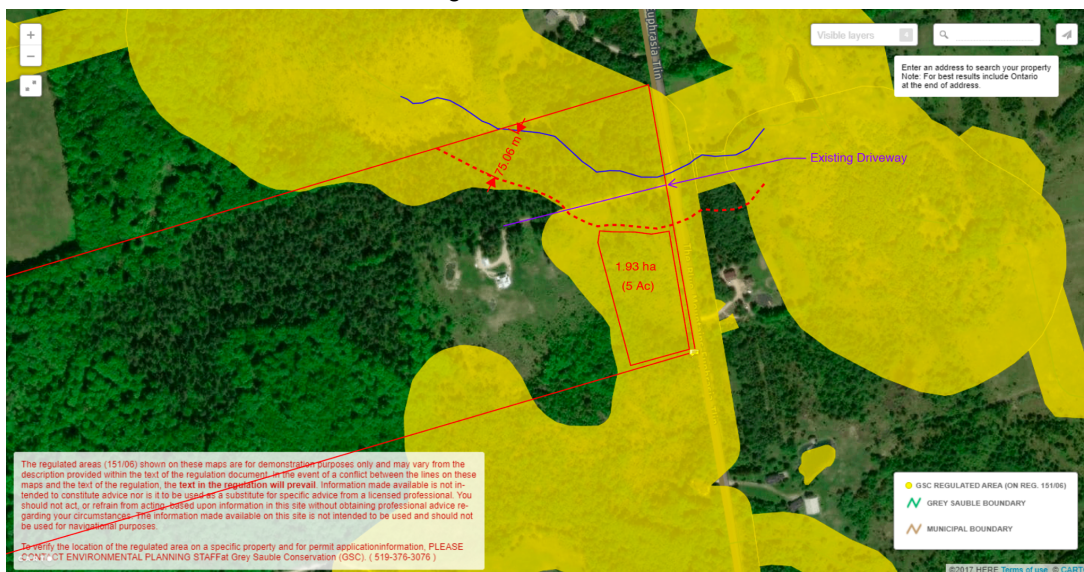
Insects and bacteria are essential in the decay process and by burying bodies in shallow graves when compared to conventional burial they are able to break down soft tissues more rapidly. In grave depths typical of natural burial the volume and weight of soil dissuades animals from digging down in favour of easier to acquire resources on the surface. There is also a smell barrier

of 18” beyond which the animals do not smell the body (Green Burial Council). Additionally the animals which are typically the greatest concern are not likely to seek out rotting meat as a food source. Burrowing animals such as groundhogs, weasels and rodents do not seek out carrion (decaying animals) as food sources. Furthermore, the FBCSA ss 154.(2) of O. Reg 30/11 states that human remains are buried at least 0.61m or 2 ft below the natural level of the ground surface. Natural burials take place at three to four feet below the surface.

WHAT WILL THE CEMETERY LOOK LIKE?

The cemetery will look like the land does right now. It will look natural. The proposed site is a meadowed area of 1.93 hectares (5 acres) at the front of the property. Originally it was new growth forest and this will be tamed to ensure that any fallen trees or obstacles that pose a safety risk are removed. Aside from a trail, there will be native flora and fauna. There could be birdhouses, and when a landscaping plan is finalized, attention will be paid to which native species of trees and plants would best nurture the eco-system. We welcome input from the local conservation authority (Grey Sauble Conservation Authority).

Conventional cemeteries have over 1000 plots per acre. Natural burial grounds, in order to be responsible land stewards, typically offer between 300 and 500 plots per acre for full body burial. The grave itself is usually 3' x 7', and the plot allowance is usually 4' x 10'. This cemetery will also allow cremated remains. This is important for people because of the logistics involved in natural burial, the cost (cremation is less expensive than full burial) and also, it allows loved ones who die at different times, to be together in the afterlife.



WILL THERE BE BUILDINGS? WHAT KIND OF INFRASTRUCTURE WILL EXIST?

The concept of a natural burial ground calls for minimum intrusion on the eco-habitat. While the details of this site have not been finalized we can assume:

- There will be a walking trail, perhaps two, which will make the graves accessible to families. These will be gravel, and wide enough to hold a backhoe if that is the chosen method of grave digging.
- There may be fencing as a way of creating boundaries to this sacred space, but it is our wish to avoid fencing if we can to maintain the integrity of natural spaces.
- There will be an area for parking, gravel only, with an allowance for no more than 10 cars
- There may be an outdoor pavilion. This could be created from local stone with a roof of local timber. It would allow families to seek protection during inclement weather
- There will be a compostable toilet in an outhouse (constructed of natural material, not the common plastic model). This recognizes the fact that often elderly attend funerals and may require the facilities more frequently.
- Rather than individual tombstones, there will be a communal marker. This could be an artistic concept designed by a local artist (TBD) or it could be a large boulder (local) with the names of the deceased engraved.

WHAT WILL HAPPEN TO THE CEMETERY IF I MOVE OR DIE?

This is our family home, which we built from scratch. We do not want to move, in fact I'd like to be buried here. However, were I to die, there are two options:

- We sell the cemetery to a private owner. There are so many people passionate about this alternative interment option, I am confident that this option is a viable one.
- The cemetery could be turned over to the municipality, along with the Care & Maintenance Fund.

It is important to note that natural burial grounds do not require the maintenance of a conventional cemetery. There are no grave markers requiring attention if they topple over, no grass that needs mowing. No weeding or pesticide application. No resurfacing of pavement or roadways. Mother Nature is the steward.

WILL THIS HAVE AN IMPACT ON THE VALUE OF NEARBY PROPERTIES?

There is polarized opinion about the value of conventional cemeteries on nearby property. For some, it is a guarantee of quiet and no development, and hence the value is higher, while for others they feel uncomfortable with the idea of the morbid looking tombstones, etc and stay clear of cemeteries. There are no statistics for new burial grounds. On judgement, given that the cemetery will protect the land in its natural habitat forever, we feel this will be a positive to neighbours also keen on preserving a pristine natural environment.

WILL THERE BE A LOT OF TRAFFIC AND INCREASED FOSSIL FUEL USAGE?

An increase in traffic is not a concern. There are a few reasons for this. Natural burials take place soon after a death. They are typically intimate gatherings of family and close friends. The ceremony, whether in a pub, a church or a funeral home, takes place at a different time and

place. Toronto is two hours away. It would be very rare for a family from Toronto to drive two



hours for an interment. The demand for natural burial grounds is growing and cemeteries closer to the GTA will open in response. Residents will likely travel by car and with time those cars will be electric. People take comfort knowing they didn't use the SUV tank full of gas that is required for each cremation.

HOW LONG WILL IT TAKE TO CREATE A NATURAL BURIAL GROUND FOR THE GREY HIGHLANDS COMMUNITY?

It won't happen overnight. There is much oversight, both environmental and as part of cemetery regulations. The steps will be outlined pending council approval, and then we will have a better idea of the timing and the cost involved. Suffice to say it will be years, not months away.

No cemetery operator is granted a license until the cemetery's bylaws have been approved. This is an opportunity to provide regulations which ensure the integrity of the neighbourhood is not compromised. It can include regulations such as number of cars allowed for any one burial, hours the site is open to the public, whether a tombstone is allowed (no), what's permissible when visiting and during an interment, etc. These bylaws will be created with public interest in mind, as well as the environment.

AM I CAPABLE OF THIS UNDERTAKING?

Yes. Natural burial grounds are changing the landscape of death in the US and the UK. Grey Highlands can also join this popular undertaking which after all is not a new idea, but an old idea getting renewed attention. These natural burial grounds are being created by doctors, farmers, ministers, people who see this as a passionate call for the community rather than a profit generator. I am equipped to shoulder the responsibility of this for my community and with my community, including:

- Excellence in all manner of complying with the Cemetery Operators License issued by the Bereavement Authority of Ontario (fund management, pre-sales management, plot location identification, transparent communications with consumer, network building with local funeral homes, florists, celebrants, faiths, environmentalists, etc).
- Compassion to offer families a new kind of goodbye and be responsive to them at their time of need
- Expertise in best practices. I am engaged in learning from the very best, Canadian owners (BC) and US owners of natural burial grounds who share their learning to help this nascent idea become a mainstream offer for people and the planet.
- Fundraising. The response from the community has been overwhelmingly positive, including offers of financial support to make this project a reality.

WHAT ARE MY MOTIVES?

I understand that people are curious about my motivations for pursuing this endeavour. Some may wonder if my husband and I purchased our property with the intention of establishing a cemetery on the property. The answer to that question is no. Our journey as a family, and as individuals within a family unit, is ever changing and evolving.

I am interested in establishing a natural burial cemetery in our community because I believe in its merits, for humans and for our planet. I had the good fortune to grow up on a 50 acre farm just outside of Stayner. I did not realize what a gift this was until I was an adult, and I started to see the ways that farm life seeped into me. I am at home when I am in nature.

I am willing to pursue creating a space where humans can choose nature as their final resting place because I believe that this idea is beautiful on so many levels. A portion of this gorgeous lush green place that we call home can be shared with others. We can be united in our vision for protecting green spaces and honouring Mother Earth with choices that we make related to living *and dying*. It is a vision that evolved naturally and organically, fuelled not as a business proposition but as a personal and community need.



I want people in my community to have an end of life choice that supports their love of nature and their desire to protect our environment. It really is that simple.

natural burial

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“ I would like to contribute to regrowth and forestation as part of my burial process.

*LG NOH**

“ We prefer this option for ourselves. For me it symbolizes a return to nature with minimal carbon cost.

DV NOC

“ As a budding naturalist, I am keen to ensure that our natural environment survives even if mankind does not, so I feel natural burial is one more step to help nature do what it does best!

SH NOC

“ I like the idea of my body going back to nature.

MH NOC

“ I love nature and find great peace when I am out in the woods and by the water. A wonderful place to be and enjoy with family and friends

JB nOH

“ It's the environment i enjoy while living.

JH NOH

“ Amazing the way we used to get back to nature. I would love to have this as my last will and testament.

LL NOC

* Person's initials, first 3 digits of postal code

“ Back to the earth from which we came! No artificial barriers between me and the worms.

LS NOH

“ I want my death and burial to be congruent with who I am. Living and dying do not need to be sanitized. I am excited to learn about the efforts being made, and the movement afoot. You have given me hope for a different ending! I look forward to learning more...

KD NOH

“ We are born as nature so let us die in the same way – free to feed the earth with my body as I have spent my lifetime taking food from the earth. Life is full circle from birth to death.

SN NOC

“ The whole idea of natural renewal appeals to me. I prefer this idea than to being encased in a cement tomb, never returning to dust.

SS NOC

“ No forest cleared and land wasted as a shrine to the dead

JF nOH

“ I am drawn to the comfort, beauty, subtly and peace of a natural landscape as a final resting place. The formal, manicured “modern” cemetery is not very appealing.

AA NOC

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“ I absolutely adore natural landscapes, flowers and birds, and I find solace and peace in such places. Therefore it would make sense to desire a natural environment for my final resting place. I have never been a supporter of the conventional burial and funeral industry. I strive to find new ways to break that mold and to explore natural sustainable ideas such as this project.

*MM NOH**

“ I have always said I wanted to be a tree with wildflowers growing over me.

KC NOH

“ It sounds like a beautiful and peaceful idea.

MC NOC

“ It's how it should be

AB NOC

“ We value the earth and wish to return all the nourishment we have enjoyed. Delicious to imagine a beautiful space where our great-grandchildren and others can saunter. Being encased in concrete, and harming the ecosystem is repugnant to us. And we need to protect land from the onslaught of development in The Blue Mountains.

JB n0H

“ This is much more environmentally friendly!!!

AE NOC

* Person's initials, first 3 digits of postal code

“ It is natural and makes sense. Why do we embalm? Who wants corpses around forever?

MP NOC

“ I have always been bothered by traditional burial methods.

SR NOC

It's how it should be

AB NOC

“ Because it just makes complete and total sense to return to the earth.

NC NOC

“ It sounds like a beautiful and peaceful idea!

MC NOC

“ it just makes so much sense. to give back to our planet.

CE NOC

“ Simple and natural. I did not know it was possible anymore.

CR NOG

“ I like to think about being useful after death by providing nutrients for ongoing growth

HK n0c

“ I always strive to leave a small footprint.

GM NOC

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“ Earth Day was created when I was 11 yrs old, on my birthday. I have loved nature my entire life, I long to live in the country again. I am now a senior, and realize my dream will be only a dream. To be buried in nature, with only a linen cover over me in my bio casket is my wish, however, the closest one is near Guelph. I now reside in Markdale, & will be here to the end. This is the greatest way to honor a body that has carried me over & through my life. A natural way of going back to the earth has always struck me as the only way to go out. Not being embalmed or cremated or in a cement encasement is the right way to honor mother earth as well. We've all done enough damage to the earth! I love the idea of having my name on a rock as well. I am a stone hound, so this is great! To be out in a field of grass, where the winds blow, the rain pours, the sun shines & it's peaceful & quiet is my wish & dream! Please make this happen for those of us who love mother nature.

*JS NOC**

“ I have no reason to try to preserve this body. I certainly don't need a gravestone; trees are so much more beautiful. A natural setting pleases me more than a formal cemetery.

SW NOH

“ Think this is an amazing idea

SC NOH

* Person's initials, first 3 digits of postal code

“ Preserving natural places is so important to me as I watch these special places get destroyed rather than mindfully considered as critical to our survival. I want my grandchildren to be able to spend time in nature and understand what that really means.

SM n0h

“ Sooooo many reasons: sustainable, beautiful, efficient ... but the biggest reason is that it is natural. Embalming, cremation, huge/ornate boxes ... all unnatural to me. Our bodies naturally revert to the earth like all other organisms in nature. Financially, socially, environmentally ... it's clear we need natural burial everywhere.

JC NOC

“ I am a lover of nature and all that lives on our beautiful earth and would like my body to be made available as nourishment for the earth.

HK NOH 1JO

“ I would like to leave as small an environmental footprint as possible when I die.

HS NOC

“ I have buried four dearly loved pets in a dedicated area of my garden. Wrapped in cotton shrouds, with a stone to mark their final resting place, the wildflowers and grass grow above them. That is what I wish for myself.

HJ NOC

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“ It provides more choices for people when dealing with a death of a love one. We should continue to look for ways to be kinder to the environment. And having the opportunity to provide this service local and not just in the city environments is beneficial for people living in grey county.

KF NOC

“ I am very concerned about the damage we are doing to the environment and would like to do everything possible to minimize my own impact on the natural world - both in life and in death.

HR NOC

* Person's initials, first 3 digits of postal code

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