



**Aged Care
Association**
NEW ZEALAND

Aged Care Association submission to the Public Health Agency on the document 'Cremation Regulations 1973: A targeted review'

June 2025

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About the Aged Care Association

The Aged Care Association (ACA) is a peak body representing aged residential care (ARC) providers in New Zealand. Our members operate over 670 facilities caring for 35,000 residents, including those in rest-home, hospital-level, dementia, and psychogeriatric levels of care.

Context

The ACA notes the Agency's targeted review of the Cremation Regulations 1973, specifically the *temporary exemption (since 2020)* permitting cremation without a practitioner viewing the body in **low-risk settings**, including aged care facilities. This exemption on 31 December 2025.

Key points of submission

1. Strong Support for Permanent Exemption
 - a. The ACA endorses **Option 2** (updating regulations to make the exemption permanent).
 - b. The exemption has proven safe and effective with no evidence of compromised identity verification or oversight in ARC settings.
 - c. Removing the viewing requirement aligns with the low-risk nature of deaths in aged care, where residents are under continuous clinical supervision.
2. Reducing Burden on Workforce
 - a. Requiring practitioners to view bodies creates unnecessary delays and strains an already overstretched health workforce.
3. Regulatory Efficiency
 - a. Making the exemption permanent eliminates administrative complexity and future expiry negotiations.
 - b. We recommend extending this exemption to all certified low-risk environments (e.g., hospice care) to ensure consistency.
4. Proposed Wording Amendment

- a. “Rest homes” are not distinct from aged residential care; they are a category of ARC facilities under the Age-Related Residential Care (ARRC) Agreement.
- b. Listing them separately implies artificial separation, creating potential confusion for regulators and providers.

Conclusion

The ACA supports the Agency to permanently embed the 2020 exemption into the Cremation Regulations 1973.

This change will:

1. Enhance efficiency in aged care end-of-life processes,
2. Reduce operational burdens on medical staff, and
3. Uphold dignity for deceased residents and their families.

We welcome further dialogue and are available to provide sector-specific insights.

