

Submission form: Victoria's draft 30-year infrastructure strategy

Your details

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About you

Please tell us which best describes you:

☐ Victorian resident
☐ Victorian business owner/operator
☐ Industry professional
☐ Community organisation representative
☐ Local government representative
☐ State government representative
☐ Researcher
☒ Other (please specify): GMCT is a Class A Cemetery Trust established in 2010, regulated under the <i>Cemeteries and Crematoria Act 2003 (Vic)</i> , and accountable to the Department of Health and the people of Victoria

Your focus areas

Select the topics or regions you are providing feedback on (select all that apply):

Topics	Regions
☐ Across sectors	☐ Regional Victoria
☒ Circular economy	☒ Urban growth areas
☐ Cities	☒ Melbourne
☒ Climate change	
☒ Community infrastructure	
☐ Education	
☐ Energy	
☐ Freight	
☒ Health	
☐ Housing	
☐ Infrastructure for Victoria’s First Peoples	
☒ Transport	
☐ Water	

More feedback (optional)

Tell us about infrastructure challenges, gaps or opportunities not covered by the draft strategy. This can include things you think we should add to an existing recommendation, or suggestions for a new recommendation.

Please provide evidence for your suggestions. This can include data, specific examples, cost benefit analyses, surveys, or program evaluations. Also, explain how your suggestions align with the objectives of our draft strategy (see page 11 of the draft strategy).

Suggestions for new recommendations should point towards infrastructure opportunities that can deliver long-term benefits for Victorians. They should also be areas where the Victorian Government has a leading role.

Cemeteries and crematoria as critical social infrastructure

The Greater Metropolitan Cemeteries Trust (GMCT) is seriously concerned that the draft strategy does not recognise cemeteries and crematoria as critical social infrastructure. Unlike other public services, which often serve only a portion of the community, cemeteries and crematoria are required to serve the end-of-life needs of every Victorian. The absence of any reference to the sector in the draft strategy, apart from a potential source of open space, is a significant oversight.

Plan Melbourne 2017-2050 projects that Melbourne's population will grow to almost eight million by 2051, emphasising the need for considerable investment in housing, jobs and supporting infrastructure. From an end-of-life perspective, the annual death rate is expected to grow by 175%, from 27,835 deaths per annum in 2021 to 48,629 in 2051. This highlights the need for a proportionate investment in deathcare infrastructure and services.

GMCT currently serves approximately 50% of the Metropolitan Melbourne catchment, with Southern Metropolitan Cemeteries Trust (SMCT) serving the balance. Cremation rates vary between metropolitan regions according to religious and cultural needs, but at present represent approximately 59% of GMCT's services and 70% of SMCT's. Although cremation rates are expected to continue to grow, demand for burials is expected to persist for many decades to meet cultural needs, particularly in the northern and western suburbs.

A failure to adequately plan for the end-of-life needs of Melburnians will impact both burial and cremation services and place additional cost burdens on Victorians during a period of compounding cost-of-living pressures. This will apply to both burial and cremation services.

The cost of **burials** will continue to increase due to the following factors:

- The underlying value of land is factored into the cost of rights-of-interment (ROI) – as the value of land continues to escalate, so too will ROI costs.
- Diminishing reserves of land are necessitating cemetery trusts to utilise areas of land that were previously considered unfeasible, or have underlying latent conditions, contributing to construction costs which are then built into the ROI cost.
- Cemetery Trusts are required to purchase land on the open market, in competition with residential and commercial developers, again contributing to the underlying cost of ROIs.
- Due to land supply and operational necessity, the remaining active cemeteries in Melbourne tend to be larger in size and located on the city fringe, resulting in increased transport costs for community members.

The key cost pressure for **cremations** is the escalating cost of gas. All of Melbourne's existing cremators are run on reticulated natural gas. With natural gas reserves in Victoria almost exhausted and a State Government policy of transition to hydrogen and renewable gas supplies, the cost implications for Victorian residents are significant. Several other considerations also exist:

- Few of the existing cremators can convert to alternative gas supplies without costly upgrades or complete replacement.
- There is no established supply chain for hydrogen or renewable gas supply and the cost of such are unknown.

- Electric cremators, which operate successfully overseas, are only currently feasible if operated at much higher volumes at higher population densities than exist in Melbourne.
- Some funeral directors are transporting the deceased into New South Wales to privately owned cremators, avoiding the potential for lower cost 'cremation only' services.

A Department of Health report *Estimation of the remaining capacity of Victorian cemeteries* published in 2012 noted the imminent exhaustion of burial land in many parts of Melbourne. From a regional perspective it noted GMCT's greenfield sites in the west (Harkness) and north (Plenty Valley) and SMCT's active site in the south (Bunurong) were the main locations for future burial capacity. It also observed that the capacity in the east (Lilydale) was likely to be exhausted by 2035 unless an alternative site could be identified.

Reviewing this report in 2025 it is apparent that land consumption since that time has exceeded projections and, conversely, that the estimates for future capacity were over ambitious. Notably, no significant cemetery sites have been purchased or expanded in metropolitan Melbourne in the intervening period.

While the current situation is of concern, fortunately there is still time for it to be addressed to avoid the type of land supply crisis experienced by Sydney's public cemeteries (see *The 11th Hour – Solving Sydney's Cemetery Crisis* as tabled in NSW Parliament, August 2020).

A policy foundation for this action already exists in *Plan Melbourne 2017-2050*:

- Direction 5.3 – Deliver social infrastructure to support strong communities
- Policy 5.3.1 – Facilitate a whole-of-government approach to the delivery of social infrastructure
- Policy 5.3.4 – Provide and protect land for cemeteries and crematoria
- Action 79 – Locations for cemeteries and crematoria

However, the *Plan Melbourne Report on Progress 2020* update on Action 79 notes that it is up to individual cemetery trusts to identify potential parcels of land for cemetery purposes and to prepare business cases for the approval of the Department of Health. This places the burden of identifying, evaluating and strategically assessing land on individual cemetery trusts and fails to provide an overarching strategic framework to support overall community needs.

This is also inconsistent with the current legislation, which restricts cemetery trusts to acquiring lands solely as extensions of their existing cemeteries, with only ministers authorised to purchase lands for cemetery and crematoria purposes. In practice, cemetery trusts may need to acquire new land which is not adjacent to an existing cemetery. Currently, only the minister could conduct this transaction.

In a broader sense, it is problematic that cemetery trusts, as self-funded not-for-profit entities, are required to purchase land on the open market, when that land is subsequently gazetted as Crown Land reserved for cemetery purposes. This process diminishes the value of the land asset and represents a poor return on investment for funds derived from a community-based, user-pays service. GMCT strongly believes that recognising cemeteries as **critical social infrastructure**, consistent with *Plan Melbourne 2017-2050*, would align with the strategic needs of Victoria's evolving population. This recognition would also ensure cemeteries are effectively integrated into the broader infrastructure planning framework including Precinct Structure Plans (PSP's) and Growth Area Framework Plans, helping to better address the social and community needs of Victorians today and in future.

Furthermore, GMCT contends that such recognition would facilitate two key outcomes.

First, it would address the restrictions on cemetery Trusts acquiring land. The current process for land acquisition is protracted and significantly hindered by the competitive open market, making it extremely difficult for cemeteries to secure the land necessary for expansion.

Secondly, recognising cemeteries in this manner would streamline the approval process for land development, ensuring that cemeteries are strategically prioritised. The current statutory obligations and approval processes delay the timely development of new land, which results in lengthy wait times for burial spaces. Prioritising and planning for cemeteries would alleviate burial inventory supply pressures, effectively reducing delays and meeting the growing demand for interment services. This approach has been taken in New South Wales in response to *The 11th Hour* report.

Incorporating cemeteries and crematoria into future infrastructure strategies would not only reflect their critical role in supporting the community but would also improve the efficiency and responsiveness of the land development process, ensuring cemeteries continue to serve the needs of the Victorian population for years to come.

Finally, specific attention needs to be given to crematoria as Victoria progresses its decarbonisation strategy. If cremation services are regarded as an essential service, then a pathway can be developed for either assuring a supply chain, subsidising costs, upgrading existing crematoria, or converting to an alternative fuel supply.

Alignment with draft strategy objectives

Enhanced strategic planning for cemeteries and crematoria aligns with the following objectives.

Victorians have good access to housing, jobs, services and opportunities

Cemeteries and crematoria are essential social infrastructure that support the end-of needs of all Victorians. This is recognised in *Plan Melbourne 2017-2050* and supported by specific directions, policies, and actions.

What is less recognised is that cemeteries and memorial parks provide long-term economic development and employment opportunities in their local communities.

As economic analysis of GMCT's proposed Harkness Memorial Park has found that this investment will provide 112 jobs over its first ten years, increasing to 173 at its peak in 2035-44. A \$600M net impact on the Victorian economy in Gross Value Add is projected across all sectors, with a \$1.5B national economic impact on the construction sector and associated supply change.

Victoria is resilient to climate change and other future risks

Cemeteries and memorial parks, as noted in the draft strategy, form part of the broader metropolitan open space network and support climate resilience. GMCT's *Cemeteries for Everyone – An Open Space Strategy* examines each of its twenty-one sites and assesses their relative contributions to supporting local climate resilience. Subsequent studies have identified opportunities to enhance tree canopy cover to enhance amenity and biodiversity and reduce urban heat.

Victoria has a thriving natural environment

GMCT actively manages approximately 620ha of public land across twenty-one sites in Melbourne's western, northern and eastern regions. Several of these sites, including Northern Metropolitan Park, Fawkner Memorial Park, Harkness Memorial Park, Coburg Pine Ridge Cemetery, Andersons Creek Cemetery, Emerald Cemetery and Healesville Cemetery contain remnant bushland, large trees, and waterways.

As public land managers with a statutory responsibility for perpetual maintenance, cemetery trusts are in a unique position to enhance environmental values on their sites. For example, the Masterplan for Harkness Memorial Park proposes the restoration of the Arnolds Creek corridor across its 128 ha site, providing the final link between the Gilgai Woodlands and a continuous biodiversity trail that will lead to the Werribee River and Port Phillip Bay.

Victorians are healthy and safe

Cemeteries and crematoria are social infrastructure assets that operate as part of Victoria's broader health network. They provide essential end-of-life services for all Victorian, offering dignity to the deceased and compassion to the grieving.

Cemeteries, as part of the broader public land network, offer secondary functions as passive open space, supporting the health and wellbeing of local communities. GMCT's *Cemeteries for Everyone – An Open*

Space Strategy recognises these secondary purposes as an important part of its vision for the long-term maintenance of its sites.

Furthermore, contemporary planning for memorial parks, including the masterplan for Harkness Memorial Park, seek to integrate community uses, including passive recreation, into site design from the outset.

What we are seeking

GMCT contends that Victoria's next 30-year infrastructure strategy must:

- Identify cemeteries and crematoria as **critical social infrastructure** that requires whole-of-government strategic priority.
- Emphasise the need for coordinated long-term strategic planning for cemeteries and crematoria throughout Victoria, but particularly in metropolitan Melbourne.
- Recognise that the current decentralised approach to cemetery land acquisition cannot support long-term strategic objectives and is putting upward pressure on burial costs.
- Nominate a government agency responsible for identifying, procuring, and reserving public land to secure a long-term supply of land for cemeteries in locations that are accessible to growth areas.
- Identify the need for a fully funded and resourced transition plan for Victoria's crematoriums in response to dwindling gas supplies and Victoria's energy transition strategy.
- Advocate for planning reforms to streamline the rezoning of land for cemetery purposes consistent with other critical social infrastructure and in line with the approach adopted in New South Wales.

Additional, more specific recommendations are provided in the body of this submission.

Your feedback

Add as many sections as you need to provide all your feedback in this submission.

Topic/area:	Victorians have good access to housing, jobs, services, and opportunities
Recommendation name:	Make government infrastructure more accessible
Recommendation number:	6
1. Do you support this topic or recommendation?	☐ Yes ☐ No ☒ In part
2. Tell us why	While GMCT supports the intent of Recommendation 6 to improve accessibility through transport upgrades, we only partially agree with the recommendation as currently framed. Limiting accessibility upgrades solely to the transport network unreasonably narrows the scope and overlooks broader opportunities to enhance access across a range of public infrastructure and services. Instead, accessibility improvement should take a more integrated approach that encompasses the built environment, public open spaces, and community facilities. This would better address the diverse accessibility needs of all Victorians and support more inclusive outcomes.
3. Share any supporting evidence or examples	The GMCT Community Advisory Committee (CAC) has emphasised the importance of providing accessible public transport stops close to cemeteries, to better support visitors who are unable to drive or who experience mobility challenges. Current transport links for cemetery sites vary and are inclined to not have existing transport links.
4. Include proposed changes and improvements	Consider broadening the scope of accessibility upgrades to include a wider range of sectors, with specific attention to cemeteries. Ensuring that public transport stops are appropriately located to provide access to cemeteries will support individuals who do not drive or are reliant on public transport. This approach would not only improve equity of access but also enhance the community value of cemeteries as inclusive public spaces, supporting their role in active transport networks and outdoor recreation.

Topic/area:	Victorians are healthy and safe
Recommendation name:	Build safe cycling networks in Melbourne and regional cities
Recommendation number:	17
5. Do you support this topic or recommendation?	☒ Yes ☐ No ☐ In part
6. Tell us why	GMCT supports Recommendation 17, which encourages the enhancement of green open spaces and their integration into active transport networks. GMCT's Open Space Strategy – <i>'Cemeteries for Everyone'</i> notes that cemetery spaces have the potential to contribute significantly to this objective by serving as accessible, safe, and connected active transport corridors.
7. Share any supporting evidence or examples	Many GMCT-managed sites are strategically located within Metropolitan Melbourne and possess the scale and landscape characteristics that can support walking and cycling infrastructure without compromising the land's primary commemorative function. GMCT is currently working with Merri-Bek City Council to improve missing pedestrian and cycling linkages that would otherwise distort the broader network. By incorporating well-planned pathways and connections, these parks can offer residents and visitors additional active travel options, improve connectivity between neighbourhoods, and contribute to broader sustainability and health outcomes.
8. Include proposed changes and improvements	GMCT welcomes further collaboration with relevant stakeholders to explore opportunities for appropriate active transport implementation that respectfully complements cemetery landscapes' primary purpose and setting.

Topic/area:	Victoria has a thriving natural environment
Recommendation name:	Better use Government land for open space and greenery
Recommendation number:	26
9. Do you support this topic or recommendation?	☒ Yes ☐ No ☐ In part
10. Tell us why	GMCT support Recommendation 26, which highlights the need to ensure the long-term maintenance of public assets held in perpetuity. While the strategy does not explicitly categorise cemeteries as public infrastructure assets, GMCT believe it is essential to recognise these sites as such, given their critical role in the cultural, historical, and environmental fabric of our communities. GMCT's open space strategy '<i>Cemeteries for Everyone</i>' recognises that its memorial parks and cemeteries provide public benefits beyond their primary function, including the provision of green spaces, heritage preservation, and ecological contributions. As places of reflection and community gathering, these sites are integral to the quality of life in our urban environments. Therefore, it is crucial that they are maintained as public assets in perpetuity, ensuring their preservation for future generations. GMCT urges that cemeteries be referenced in the strategy as public infrastructure assets to reflect their importance to the public and their ongoing role in supporting community well-being. We are committed to working with relevant stakeholders to ensure these sites are safeguarded and remain accessible and beneficial for all.
11. Share any supporting evidence or examples	The <i>Cemeteries for Everyone</i> strategy emphasises the broader value of cemeteries, highlighting their role as community assets that provide green space, heritage preservation, and ecological benefits. Recognising GMCT sites as public infrastructure assets for both passive and active purposes like recreational uses and social events, will ensure their long-term accessibility and preservation, benefiting future generations.
12. Include proposed changes and improvements	GMCT proposes Recommendation 26. be amended to explicitly recognise memorial park and cemetery sites as public assets to be maintained in perpetuity. Cemeteries provide vital green space, heritage preservation, and ecological benefits to the community. Recognising them as public assets will ensure their long-term sustainability and accessibility for future generations.

Topic/area:	Victoria has a thriving natural environment
Recommendation name:	Reduce greenhouse gas emissions from infrastructure
Recommendation number:	27
13. Do you support this topic or recommendation?	☒ Yes ☐ No ☐ In part
14. Tell us why	GMCT agrees with Recommendation 27, which emphasises the importance of integrating environmental factors such as carbon emissions into infrastructure planning. While the strategy does not currently identify cemeteries as public infrastructure assets, we acknowledge the growing need for all public assets, including GMCT-managed sites, to consider environmental impacts, including carbon emissions. At present, while there are no specific cemetery-related requirements when it comes to carbon measurement, GMCT assesses environmental costs and benefits qualitatively. GMCT recognise the importance of developing more precise metrics for carbon emissions and is actively taking steps toward measuring and reporting on these emissions in the future. To support this transition, GMCT would appreciate guidance and potential resources from the government to assist with the development of robust carbon measurement and reporting frameworks for cemeteries. This would ensure that we align with broader sustainability goals and contribute to Victoria's long-term environmental objectives.
15. Share any supporting evidence or examples	As outlined in the GMCT Annual Report 2023-24, GMCT carbon emissions for the 2023-24 period are projected at approximately 1,227 tonnes per annum, with most of these emissions attributed to gas use. This data highlights the significant environmental impact of our current operations and reinforces the need for more comprehensive environmental metrics, including carbon emissions, in infrastructure planning and decision-making processes.
16. Include proposed changes and improvements	GMCT proposes that Recommendation 27, explicitly recognises cemeteries and memorial parks as public infrastructure assets, particularly in the context of environmental considerations, including greenhouse gas emissions. This recognition will facilitate aligning cemetery management practices with broader sustainability objectives. Additionally, GMCT seeks government guidance and resources to support the development of robust carbon measurement and reporting frameworks for cemeteries. Furthermore, GMCT requests the establishment of supporting legislation and programs that enable the transition to actionable strategies for reducing greenhouse gas emissions, such as the adoption of alternatives to natural gas. These initiatives will further support our ongoing efforts to mitigate the environmental impact of cemetery operations.

Topic/area:	Victoria has a thriving natural environment
Recommendation name:	Advance integrated water management and use more recycled water
Recommendation number:	28
17. Do you support this topic or recommendation?	☒ Yes ☐ No ☐ In part
18. Tell us why	GMCT fully supports Recommendation 28, which encourages the adoption of Water Sensitive Urban Design (WSUD) techniques to improve water management in infrastructure projects. At GMCT, WSUD techniques are embedded in the design of our cemeteries, and we have established strong working relationships with water authorities to enhance our water management practices. As a result of these initiatives, we have observed significant benefits, including healthier creeks, improved drainage outcomes, and a reduction in potable water usage. These positive outcomes demonstrate the effectiveness of WSUD in creating more sustainable, resilient environments. GMCT is committed to continuing its efforts to integrate WSUD practices across our cemetery sites and support broader initiatives to improve water management throughout Victoria.
19. Share any supporting evidence or examples	Through grants and partnerships with water authorities, GMCT has saved several megalitres of water and enhanced sustainability outcomes. Additionally, the GMCT Horticulture Team has received funding for revegetation projects, further improving water management. These initiatives highlight how these partnerships support long-term management of GMCT-managed sites and the positive impacts of WSUD in achieving better environmental and water conservation outcomes.
20. Include proposed changes and improvements	GMCT supports Recommendation 28 to prioritise integrated water management (IWM) in greenfield development. GMCT recommends that greenfield master planning explicitly incorporate IWM as a central consideration from the earliest stages of site visioning and infrastructure development. As long-term community assets and open green spaces, cemeteries can contribute to sustainable water management outcomes, including stormwater harvesting, passive irrigation, and improved biodiversity. GMCT encourages the government to consider increased funding and targeted support for public land managers such as GMCT to enable the implementation of IWM principles across both existing and future sites. These enhancements to Recommendation 28 will help ensure that cemetery land can meaningfully contribute to delivering sustainable, and climate-resilient communities.
Topic/area:	Victoria is resilient to climate change and other future risks

Recommendation name:	Better prepare infrastructure for climate change
Recommendation number:	30
21. Do you support this topic or recommendation?	☒ Yes ☐ No ☐ In part
22. Tell us why	GMCT support Recommendation 30, which promotes embedding climate change considerations into infrastructure planning and delivery. GMCT recognises the importance of climate resilience and already incorporates hazard assessments and environmental risks into its asset management practices. However, there is currently limited funding available for climate adaptation in the cemeteries sector, with most resources directed toward new interment infrastructure. Cemeteries require dedicated support to strengthen their capacity to respond to climate impacts, particularly in areas such as stormwater management, biodiversity, and sustainable land use. GMCT welcomes the opportunity to work with the State Government to explore funding mechanisms and policy support that will better equip cemeteries to meet the challenges of a changing climate.
23. Share any supporting evidence or examples	GMCT sites are exposed to hazards such as flooding, bushfires (particularly in eastern sites), and drought conditions in the west, where most sites lack irrigation. These challenges highlight the importance of proactive climate risk management and the need for continued support to strengthen the resilience of cemetery infrastructure.
24. Include proposed changes and improvements	GMCT supports the intent of Recommendation 30, which calls for embedding climate resilience into infrastructure planning. However, we propose an enhancement to the recommendation to recognise the need for additional funding sources to support climate adaptation for sectors including cemeteries. Class A cemeteries in Victoria are self-funded, with limited eligibility for grants from Federal and State Government. Access to alternative funding that is specifically dedicated to climate adaptation planning, research, and innovation would enable the sector to build long-term resilience without increasing the burden on the existing levy or compromising critical operational functions. This draws to the importance of exploring sustainable funding models that enable the sector to respond effectively to the growing challenges posed by climate change.

Topic/area:	Victoria is resilient to climate change and other future risks
Recommendation name:	Coordinate faster delivery of key energy infrastructure
Recommendation number:	32
25. Do you support this topic or recommendation?	☒ Yes ☐ No ☐ In part
26. Tell us why	GMCT support Recommendation 32, which calls for the acceleration of key energy infrastructure to support the transition to a low-emissions economy. For the cemeteries sector, a key challenge in decarbonisation is access to sufficient and reliable renewable energy to support the shift to lower-carbon operations. Addressing barriers such as energy supply constraints, excessive costs, and supply chain limitations through faster deployment of energy infrastructure would provide the sector with the foundation needed to transition effectively. GMCT welcomes efforts to prioritise investment in renewable energy infrastructure, which will be essential for enabling sectors like ours to contribute meaningfully to Victoria's emissions reduction targets.
27. Share any supporting evidence or examples	Click or tap here to enter text.
28. Include proposed changes and improvements	GMCT supports the intent of Recommendation 32 of Infrastructure Victoria's 2021–2051 Strategy. However, GMCT proposes that it specifically address the challenges cemeteries face in accessing lower-carbon energy due to infrastructure limitations. GMCT would fully support this recommendation if it helps resolve these access issues, enabling sectors like ours to transition to more sustainable energy sources and contribute to emissions reduction goals.

Topic/area:	Victoria is resilient to climate change and other future risks
Recommendation name:	Invest in home, neighbourhood, and big batteries for more energy storage
Recommendation number:	34
29. Do you support this topic or recommendation?	☒ Yes ☐ No ☐ In part
30. Tell us why	GMCT strongly supports Recommendation 34, which advocates for the development of community battery systems as part of a sustainable energy infrastructure. Cemeteries present a unique opportunity to support this initiative. Due to their typically large, open spaces and low energy demand, cemeteries could serve as suitable locations for housing community batteries. Incorporating cemeteries into an integrated energy scheme would not only benefit the broader community but also contribute to more sustainable energy usage. GMCT believe this approach aligns well with both the needs of the cemeteries sector and the state's renewable energy goals, and GMCT is keen to explore how cemeteries can play a role in advancing this important infrastructure.
31. Share any supporting evidence or examples	Cemeteries, as stable sites held in perpetuity, are well-positioned to support this initiative. Their long-term stability, large open spaces, and low energy demand make them ideal locations for hosting community batteries. By incorporating cemeteries into the community battery infrastructure, GMCT can enhance energy storage capacity, contribute to local resilience, and align with the state's sustainability objectives. This evidence substantiates the potential of cemeteries to play a valuable role in Victoria's renewable energy transition, benefiting both the sector and local communities.
32. Include proposed changes and improvements	No changes proposed.

Topic/area:	Victoria is resilient to climate change and other future risks
Recommendation name:	Develop regional energy plans, guide transition from fossil gas and maintain reliable gas supply
Recommendation number:	36
33. Do you support this topic or recommendation?	☒ Yes ☐ No ☐ In part
34. Tell us why	GMCT strongly support Recommendation 36, which advocates for exploring low-emission alternatives in key sectors, including the cremation industry. At GMCT, gas-fired cremations account for 90% of our total gas usage, highlighting the significant environmental impact of this process. While hydrogen as a fuel source is an emerging technology gaining momentum globally, it is not yet a feasible alternative at current rates within the GMCT context. However, GMCT believes that government co-investment in a pilot project focused on hydrogen or other low-emission technologies could yield substantial environmental and operational benefits. Such an initiative would provide critical insights into the potential for transitioning the cremation sector to more sustainable practices, aligning with Victoria's broader emissions reduction targets.
35. Share any supporting evidence or examples	GMCT currently consumes 14TJ of gas annually, costing approximately \$261,000 per year. This significant usage highlights the need for more sustainable energy sources. Our existing cremation facility in Fawkner is capable of handling up to 20% hydrogen (H2) in the fuel mix with minimal facility modifications, though it would still require enhanced mixing capabilities for optimal performance.
36. Include proposed changes and improvements	GMCT proposes for further consideration of the challenges faced in transitioning to these technologies. While it is crucial to explore hydrogen and other low-emission technologies, GMCT would benefit from targeted government support to address these barriers, including investment in infrastructure and cost reduction strategies. Government co-investment in pilot projects or incentives for transitioning to renewable gas could significantly accelerate this shift, helping to reduce the sector's carbon footprint while supporting long-term sustainability.

Topic/area:	Victoria has a high productivity and circular economy
Recommendation name:	Prepare and publish infrastructure sector plans to shape Victoria's cities
Recommendation number:	38
37. Do you support this topic or recommendation?	☒ Yes ☐ No ☐ In part
38. Tell us why	GMCT supports Recommendation 38. As an organisation responsible for long-term planning to meet the evolving needs of Victoria's communities, GMCT maintains a comprehensive long-term financial plan that periodically forecasts population growth and identifies corresponding cemetery infrastructure and land requirements. Enhanced access to reliable and up-to-date population projections and greater visibility of land availability will significantly strengthen GMCT's ability to respond proactively to future demand. This increased data transparency will enable GMCT to be more agile and adaptive in its strategic planning and land use decisions, ensuring that infrastructure and service delivery align with the long-term needs of Victoria's growing and diverse population.
39. Share any supporting evidence or examples	Click or tap here to enter text.
40. Include proposed changes and improvements	GMCT supports Recommendation 38 and welcomes efforts to improve planning and infrastructure data access. GMCT recommends that cemeteries be formally recognised as critical social infrastructure. Identifying cemeteries as infrastructure will ensure they are planned appropriately for future land use and investment decisions. Enhanced access to reliable population and land availability data will also improve GMCT's ability to plan proactively and meet long-term community needs

Topic/area:	Victoria has a high productivity and circular economy
Recommendation name:	Reform infrastructure contributions
Recommendation number:	39
41. Do you support this topic or recommendation?	☐ Yes ☐ No ☒ In part
42. Tell us why	GMCT partially supports Recommendation 39. While GMCT recognises the importance of reviewing infrastructure funding mechanisms to ensure fair and effective contributions, GMCT notes that the cemetery sector's exclusion from the current infrastructure contribution system creates significant challenges. Without access to these funds, the excessive cost of land establishment must be absorbed by the sector and passed onto families. This financial barrier impacts our ability to maintain a sufficient and sustainable supply of graves to meet growing community demand. Granting cemetery trusts access to infrastructure contributions would help address these pressures and appropriately recognise the sector's role in delivering essential, community-focused services.
43. Share any supporting evidence or examples	Despite sustained population growth no new cemetery sites have been reserved within or adjacent to the Melbourne Metropolitan area in the 21st century. This is due to the inability of the two metropolitan Class A Cemetery Trusts to compete for commercially available land within the urban growth boundary, and due to community opposition to the establishment of new cemeteries within green wedges.
44. Include proposed changes and improvements	GMCT supports Recommendation 39 and recommends that the cemetery sector be included in the review of infrastructure contributions. Currently excluded from these funding mechanisms, the sector faces high land establishment costs that are passed onto families and limit GMCT's ability to meet future demand. GMCT seeks active participation in the review to help ensure fair access and recognition of cemeteries as essential community infrastructure.

Topic/area:	Victoria has a high productivity and circular economy
Recommendation name:	Improve asset management of all government infrastructure
Recommendation number:	40
45. Do you support this topic or recommendation?	☒ Yes ☐ No ☐ In part
46. Tell us why	GMCT supports Recommendation 40 and welcomes the focus on improving asset management across public infrastructure. As sector leaders in asset management, GMCT are committed to maintaining high standards and leveraging best practices. A dedicated funding stream will enable us to strengthen these capabilities, respond to future challenges, and make better use of emerging technologies to improve service delivery and long-term sustainability.
47. Share any supporting evidence or examples	Click or tap here to enter text.
48. Include proposed changes and improvements	A dedicated funding stream would enhance our ability to manage these assets effectively, adopt new technologies, and respond proactively to emerging challenges, ensuring continued service delivery to the Victorian community.

Topic/area:	Victoria has a high productivity and circular economy
Recommendation name:	Prepare for more recycling and waste infrastructure
Recommendation number:	41
49. Do you support this topic or recommendation?	☐ Yes ☐ No ☒ In part
50. Tell us why	GMCT partially supports Recommendation 41. While GMCT agrees with the need to plan for waste processing infrastructure, the recommendation appears to focus primarily on setting aside land and developing end-of-cycle facilities. GMCT believes a more balanced approach is needed that also prioritises the reduction of waste generation at the source. Establishing markets for reuse and recycling, alongside stronger regulation of harmful products such as plastics, may significantly reduce the volume of waste requiring processing. This, in turn, could lessen the level of investment needed in waste infrastructure over time and support more sustainable outcomes.
51. Share any supporting evidence or examples	Cemeteries generate a considerable volume of waste, much of which holds potential for reuse, recycling, or energy recovery. However, current policies and bans on single-use plastics do not extend to common tribute materials such as plastic film, oasis floral foam blocks, and polystyrene. These non-biodegradable products persist in the environment, breaking down into harmful microplastics that contaminate soil and water. This is particularly problematic given that many cemeteries are in or near sensitive ecological areas. To address this, GMCT has initiated a <i>Sustainable Florist Working Group</i> to encourage using environmentally responsible alternatives and educate stakeholders. However, our capacity to implement change is limited without complementary policy and regulatory support from the government. GMCT recently participated in the <i>Packaging Regulation Mandate Consultation Initiative</i>, where GMCT expressed strong support for a national Extended Producer Responsibility (EPR) scheme for packaging. GMCT believes a mandatory, nationally consistent EPR approach that draws on successful international models that effectively addresses the findings of the 2021 Independent Review and the Government's response. EPR schemes address the shortcomings of the current voluntary co-regulatory model and hold producers accountable for the full lifecycle of packaging materials. Expanding such frameworks to cover items like floral tribute packaging and non-compostable materials would close significant regulatory gaps in waste management.
52. Include proposed changes and improvements	GMCT partially supports Recommendation 41 as it requires further emphasis on adopting a Circular Economy approach to waste management. GMCT recommend that a Circular Economy lens be applied to avoid and reduce waste arisings, ensuring that materials remain in circulation for as long as possible. More focused efforts

are needed to address problematic, non-recyclable items, particularly plastics, and stronger controls should be introduced in line with the *Circular Economy (Waste Reduction and Recycling) Act 2021*.

GMCT views a clear need for alignment between policy, regulation, and Victoria's broader plastic waste reduction goals. Just as jurisdictions have successfully phased out plastic shopping bags, GMCT believes there is an opportunity to extend similar measures to floral tributes in cemeteries. Promoting alternatives such as fresh flowers, biodegradable arrangements, or enduring tributes made from stone or metal would reduce plastic pollution while preserving the dignity and intent of memorial practices.

In addition to regulatory measures, GMCT encourages the Department to consider policies that promote the reuse and repurposing of cemetery waste. By fostering markets for repurposed materials and reducing reliance on landfill or large-scale processing, Victoria can move closer to a circular economy model and reduce future investment needs in waste infrastructure.

GMCT welcomes the opportunity to work with the Department to explore regulatory and market-based solutions and to ensure that cemetery practices align with Victoria's long-term sustainability objectives.

Topic/area:	Victoria has a high productivity and circular economy
Recommendation name:	Create and preserve opportunities for future major infrastructure projects
Recommendation number:	48
53. Do you support this topic or recommendation?	☐ Yes ☐ No ☒ In part
54. Tell us why	GMCT partially supports Recommendation 48, acknowledging the importance of recognising cemeteries in long-term infrastructure planning. However, GMCT notes a significant gap in the Victorian Infrastructure Strategy 2021–2051, as cemeteries are not explicitly identified as public infrastructure assets within the plan. This contrasts with <i>Plan Melbourne 2017–2050</i>, which classifies cemeteries as critical social infrastructure, highlighting the importance of their appropriate siting, regular review of internment spaces, and their role in catering to the broader Victorian community. Recognising cemeteries as public infrastructure assets, as outlined in <i>Plan Melbourne</i>, would align with the strategic needs of an evolving population and ensure cemeteries are adequately integrated into the broader infrastructure planning framework. GMCT believes that including this recognition in future infrastructure strategies would better reflect their essential role in supporting Victorians' social and community needs.
55. Share any supporting evidence or examples	<i>Plan Melbourne Direction 5.3 – Deliver social infrastructure to support strong communities</i> , <i>Policy 5.3.4</i> calls for the provision and protection of land for cemeteries and crematoria. This policy highlights the strategic importance of ensuring these services are planned for, appropriately sited, and able to meet future demand.
56. Include proposed changes and improvements	GMCT supports the intent of Recommendation 48 to improve the alignment of infrastructure planning with community needs. However, GMCT recommends strengthening the strategy by identifying cemeteries as public infrastructure assets. To align with <i>Plan Melbourne 2017–2050</i>, which recognises cemeteries and crematoria under <i>Direction 5.3—Deliver social infrastructure to support strong communities</i> and <i>Policy 5.3.4—Provide and protect land for cemeteries and crematoria</i>, future infrastructure strategies should acknowledge the role of cemeteries when considering the creation and preservation of infrastructure across Victoria, particularly in the context of Melbourne's growing population. Recognising cemeteries in this way will help ensure they are appropriately planned for, protected, and integrated into long-term land use and infrastructure decision-making.

