

CEMETERY PLANNING GUIDE

Sharing Knowledge & Best Practices
for On-Reserve Cemetery Planning in
Ontario, Canada



ONTARIO ABORIGINAL
LANDS ASSOCIATION

Contents

About OALA	v
1.0 Introduction	1
1.1 Purpose of the Cemetery Planning Guide.....	1
1.2 What We've Heard.....	1
2.0 Past	2
2.1 Legacy Issues	2
2.1.1 Unmarked Graves.....	2
2.1.2 Stolen Artifacts	3
2.2 Cemetery Mapping.....	3
2.2.1 Mapping Existing Plots	4
2.2.2 Marking Plots in the Field	5
2.2.3 Ground Penetrating Radar	5
2.3 Land Tenure	6
2.3.1 Managing Private Burials	6
2.3.2 Cemeteries on Land with a Registered Certificate of Possession.....	7
3.0 Present	8
3.1 Funding & Staffing.....	8
3.1.1 Financial Planning.....	8
3.1.2 Staffing	11
3.2 Records Management.....	12
3.3 Policies and Plans.....	12
3.4 Interment Options	14
4.0 Future	16



4.1	Grounds Maintenance	16
4.1.1	Water.....	16
4.1.2	Earth	17
4.1.3	Vegetation.....	17
4.2	New Cemetery Site Selection.....	18
4.2.1	How Big Does the New Cemetery Need to Be?.....	18
4.2.2	Where Should the New Cemetery be Located?	20
4.3	Communication & Engagement.....	22
5.0	Conclusion	23
5.1	Further Reading.....	23

Tables and Figures

Table 1: Challenges in Cemetery Management	1
Table 2: Available Financial Supports for Cemetery Management.....	10
Table 3: Sample Excel Spreadsheet to Record Details	12
Figure 1: Cemetery Support Facilities.....	20





Contact the Ontario Aboriginal Lands Association

OALA Headquarters

1024 Mississauga Street,
Curve Lake, ON K0L 1R0
519-857-9226

OALA Satellite Office

9119 West Ipperwash Road,
Kettle and Stony Point, ON N0N 1J1

✉ Email: info@oala-on.ca

🌐 Website: www.oala-on.ca

📘 Facebook: <https://www.linkedin.com/company/ontario-aboriginal-lands-association/>

🌐 LinkedIn: <https://www.facebook.com/people/Ontario-Aboriginal-Lands-Association/61585991528751/#>

Acknowledgements

The Ontario Aboriginal Lands Association (OALA) gratefully acknowledges the insights, knowledge and experiences from our membership to inform the development of this guide. We would also like to acknowledge our primary consultants at Dillon Consulting Limited, and the contributions of Janette Loveys-Smith through Catalyste+.

Disclaimer

This guide does not constitute legal advice. Please consult a lawyer if you require legal advice concerning cemetery planning and management.



About OALA

The Ontario Aboriginal Lands Association (OALA) is a not for profit, non-political, grass roots organization that provides networking, peer support and training opportunities for First Nation Lands Mangers in Ontario.

Our History

In 1995, OALA was formed by a small group of Land Managers to address unique land management issues and common interests by providing a forum to strategize on problems and concerns with Lands Managers across Ontario. This profession comes with an exceptional amount of responsibility to maintain the integrity of the First Nation lands they are managing while navigating the legal obligations required to effectively manage land, whether under the Indian Act, or as signatories to the Framework Agreement on First Nation Land Management. Working together to build networks to support each other is the foundation of this Association.

OALA became federally incorporated in 2021 and one of eight (8) Regional Land Associations (RLA). The RLAs are independent regional or territorial associations recognized and guided by the National Aboriginal Lands Managers Association (NALMA).

Since its inception, OALA has been managed by volunteer Land Managers, who make up the Board of Directors. OALA has proudly expanded to encompass 59 member First Nations and 1 associate member across Ontario, each operating under various land regimes.

OALA continues to strategically develop resources, networking and training opportunities driven by its membership, the Land Managers, and Lands Management staff working on the ground at their First Nations.



1.0 Introduction

First Nation Lands Managers in Ontario are tasked with a wide variety of responsibilities related to the management and administration of reserve lands, environment, and resources.. At times, these responsibilities can present challenges for which there is minimal guidance and support. Through continuous dialogue and feedback from our OALA members, it is clear that the management of cemeteries is one such responsibility.

Cemetery management first emerged as a commonly requested area of interest during our 2023 annual planning engagement. OALA members identified it as an area where additional support and capacity-building were needed. In response, we explored the topic further through focused online peer support sessions and lunch-and-learn events. Through this engagement, we gained a better understanding of the needs and realities of cemetery management on reserve. Today, we are pleased to share the first edition of this guide.

1.1 Purpose of the Cemetery Planning Guide

The OALA Cemetery Planning Guide is designed to share best practices and assist in guiding the management of existing and future cemeteries on reserve lands in Ontario. It is not specific to any one Nation or culture, and should be referenced along side the laws, by-laws, policies, plans, and cultural practices of your First Nation. The purpose of this document is to consolidate information related to cemetery management through the lens of land management on reserve. Drawing on the experience of Landscape Architects, Planners, and Cemetery Managers this is intended to be a practical guide for those who oversee burial places as one part of their job.

1.2 What We've Heard

Discussions about cemetery management with OALA members have highlighted the aspects of cemetery management that bring the greatest challenges. We've chosen to present them here in the categories Past, Present, and Future to reflect how cemeteries connect generations across time.

Table 1: Challenges in Cemetery Management

 Past	 Present	 Future
• Missing Records • Unmarked Graves • Stolen Artifacts • Burials on Private Land	• Policy Gaps • Space Limitations • Out-of-Date Maps • Inadequate Funding	• Soil Erosion • Uncertainty about Future Cemetery Sites • Predicting Demand

The needs of our members continue to inform our programming and the types of guides we produce. Please consider reaching out to us through the form on our website (<https://oala-on.ca/contact/>) if you found this guide helpful or have a sub-topic you would like us to explore. We are always looking for ways to refine and keep our resources updated and relevant and your input is greatly appreciated.



2.0 Past

Cemetery management can quickly become challenging when records, maps, markers, and boundaries degrade. The topics in this section focus on managing issues that have arisen over the life of an existing cemetery. If your community is beginning their journey of cemetery management and wants to lay a strong foundation for the future, this is a good place to start.

2.1 Legacy Issues

2.1.1 Unmarked Graves

In many cemeteries, it is not unusual for there to be areas where the exact location of burials or other interments¹ is unknown, due to missing or deteriorating records, inaccurate documentation at the time or markers that have been lost due to exposure. Your best source of information in these cases is the living memory of your community members. However, care should be exercised when engaging on this topic, and non-invasive technologies like GPR may still be required (see **Section 2.2.3**). The following list outlines recommended steps when attempting to identify unmarked graves.

1. Identify and mark the area of interest
2. Collect any physical or digital internal records that may help identify the number of burials, locations, or occupants.
3. Perform an initial community outreach focusing on Elders, Knowledge Holders, and those that may have been involved in the maintenance of the cemetery or area.
4. Bring the project to the attention of Membership in a respectful way, and discuss Steps 5 and 6 before proceeding.
5. Conduct a Ground-Penetrating Radar study of the area of interest.
6. Conduct archival research to assist in identifying the remains.

Depending on the success of your work you may need to consider how to proceed with grave markings without names. Based on the goal of your initiative, consider the need to excavate some or all of the burials to assist in identification through forensic analysis. This is generally only considered in situations where there is broad support from Membership and an identifiable need to identify or relocate unmarked burials. Some communities will be uncomfortable with this and ceremonial practices should be considered prior to excavation.

¹ 'Interments' is an umbrella term for placing human remains in their final resting place.



2.1.2 Stolen Artifacts

Artifacts Inside Canada

Artifacts that have been stolen from First Nations cemeteries over time can settle in both legal and illegal collections. The process for returning artifacts in illegal collections (generally these are ones owned by private individuals) is more straight-forward but less reliable. Contact your local police department to report a theft, provide as much detail as possible, and seized items will be returned when they are no longer need as evidence.

Returning artifacts in legal collections like museum archives, involves a more nuanced process but can often see results. Some provinces in Canada have Provincial Repatriation Policies that support the return of cultural artifacts to their home communities in accordance with United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). Ontario is not currently one of these provinces however, so the approach to repatriation of artifacts is governed at the institutional level. If an artifact has been stolen from your cemetery and appears at the Royal Ontario Museum, for example, there is a long-standing policy that museum staff will work with your community to return the artifact provided it meets certain criteria². Smaller institutions can be less transparent with their position on this topic but until there is provincial legislation in Ontario on the matter, the legal avenues are limited.

Artifacts Outside Canada

The movement of cultural artifacts across Canadian borders is governed by the Cultural Property Export and Import Act (R.S.C., 1985, c. C-51). This act established a Control List of items that Canadians can attempt to legally repatriate, and it includes: "...objects that were made by, or objects referred to in paragraph (d) that relate to, the **aboriginal peoples of Canada** and that have a fair market value in Canada of more than five hundred dollars."

According to a publication from Anishinabek Nation, "The inclusion within the Control List of Aboriginal items means that with the support of a cultural institute, **First Nations may be able to repatriate cultural items taken from their communities or burial sites with assistance by the Canadian Cultural Property Export Review Board** allowing cultural institutions to purchase those cultural items and artifacts from museums."³

2.2 Cemetery Mapping

Reliable maps are fundamental to cemetery management, but they don't need to resemble a comprehensive digital database of surveys. There are low-tech and affordable options for mapping your cemetery for the first time or updating old maps. Anything that allows future managers of the cemetery to understand where people are buried, the capacity of the cemetery, and areas with special O&M requirements is often sufficient.

² Royal Ontario Museum, <https://www.rom.on.ca/sites/default/files/2025-04/Repatriation%20of%20Canadian%20Indigenous%20Objects%20REV18.pdf>

³ Anishinabek Nation Toolkit for Understanding Heritage & Burials – Rights & Issues (2023)



2.2.1 Mapping Existing Plots

Mapping a cemetery can vary in complexity depending on the size and layout of the cemetery and the level of detail you want to include. Here are some steps you can follow to map a cemetery without specialized training or tools:

1. **Plan and Prepare:** Before you start mapping, it's helpful to plan your approach. Determine the boundaries of the cemetery and decide how detailed you want your map to be. Make sure you have permission to map the cemetery, as some may have restrictions on photography or mapping activities.
2. **Gather Tools:** You will need some basic tools for mapping, such as a measuring tape, a compass, and possibly a GPS device or smartphone with mapping apps. Capturing GPS coordinates is important for cemetery management software and digital mapping, but if you are creating a first-generation physical map landmarks and the relative position of graves is more important. You may also want to bring a camera or sketchpad to document details of the cemetery.
3. **Walk the Cemetery:** Walk through the cemetery, noting the layout of the graves, pathways, trees, and other landmarks. Use your measuring tape or GPS device to measure distances between graves or plot out the dimensions of the cemetery.
4. **Document Details:** Take notes or photographs of any important details, such as the names and dates on grave markers, the types of graves and any unique features of the cemetery. Rectangular depressions in the ground could indicate collapsed caskets, and are worth noting.
5. **Create a Map:** Once you've gathered all the necessary information, you can create a map of the cemetery. Tracing the aerial imagery of the area on Google Earth is a good place to start for hand-drawn maps. Digital maps can also be created in Google Earth, however, you'll want to migrate to a Geographic Information System (GIS) over time to improve accuracy. Include labels for graves, pathways, and landmarks to make the map easy to understand.
6. **Review and Revise:** After creating the initial map, review it for accuracy and completeness. A good test is to have someone familiar with the cemetery but uninvolved in the project to attempt to interpret the map. Make any necessary revisions or additions to ensure that the map accurately represents the cemetery.
7. **Share or Publish:** Depending on your purpose for mapping the cemetery, you may want to share the map with others, such as the First Nation Administration, Chief & Council, and Membership.

Remember to be respectful when mapping a cemetery and consider the privacy and sensitivities of those who may have loved ones buried there. See **Section 4.3** for more information on communicating with community members.



2.2.2 Marking Plots in the Field

Cemetery staff can use survey pins, granite markers, or simply rocks to visually denote the edges of existing and planned plots. This serves multiple purposes:

1. It defines the boundary of each plot so excavations and markers (headstones, plaques, etc.) do not encroach into a neighbouring plot.
2. It can assist the Cemetery Manager and operations staff in maximizing the available burial space while still maintaining sufficient open space between the plots.
3. It can assist with future planning for new roads, buildings, furnishings, etc.
4. Can facilitate locating exact plots in the field, even in an area with little to no burials.

2.2.3 Ground Penetrating Radar

Ground Penetrating Radar, or GPR, is a technology that uses radio waves to identify objects and empty spaces underground. GPR cemetery surveys are non-intrusive as they don't involve excavation and are useful for locating graves by detecting changes in density in the ground. Through GPR you are able to identify buried caskets, vaults, burial trenches, collapsed caskets, and more.

When to Consider GPR

Due to the high costs and time it takes to process results, GPR surveys are best used in clearly defined areas with a high likelihood of potential unmarked burials. Local knowledge and archival records are generally less expensive first steps. It is very important to note that GPR cannot provide any information on the identity of remains in an unmarked grave. Therefore, it is a valuable step in the process but will only provide areas of interest or possible burials. Other reasons to pursue a GPR survey in a cemetery setting is to confirm the presence of a mass burial so that it can be properly recognized.

Before Hiring a GPR Firm

Establish a well-defined boundary of the area that needs to be surveyed. GPR works by running equipment on the ground in parallel lines, like a lawnmower or a seed spreader. The lines are typically spaced 0.25m or 0.5m apart and the survey is very thorough. Due to this, it is recommended that a "generous" boundary is defined, capturing all areas where there is a possibility of unmarked graves.

Most GPR firms specialize in locating underground utilities like power lines. Before hiring a firm, you should confirm that they have done GPR for unmarked graves before. GPR equipment can come in a variety of different radar sizes and each is tailored to surveying specific depths underground. A high-powered antenna can survey very deep, but the power may be too high to gain any usable information closer to the surface. For cemeteries, a low powered GPR is standard (100-250MHz antenna), as the depths being surveyed are between 1.5-3.0 m maximum.



After Hiring a GPR Firm

When the survey is complete, the GPR firm will submit a report that summarizes their methods, site conditions, and findings. The report should also contain maps identifying exactly where they found a possible “positive” (i.e., likely an unmarked grave). It is important to note that due to the nature of the technology, a report will never guarantee the location of the unmarked graves and it will always be presented as a “low likelihood” or a “high likelihood”. Fortunately, while the conditions above ground will change constantly over time, the information gained by a GPR survey is only needed once for any given area.

2.3 Land Tenure

Land tenure, or who has which rights in relation to an area, is particularly important when it comes to cemetery management. The long-term and culturally sensitive nature of cemeteries means they are often best managed collectively, by First Nations themselves, opposed to individually, by Members or families.

For communities where land management is governed by the Indian Act, the designation of new cemeteries may be subject to SS 18.2 of the *Indian Act* which authorizes the use of reserve lands for certain types of purposes that benefit the First Nation as a community and are for the general welfare of the First Nation; Indian burial grounds fall within this category. Broadly speaking this can be achieved through obtaining a formal survey of the area, a Band Council Resolution and approval by the Minister of Indigenous Services Canada.

Communities that are a signatory to the *First Nations Land Management Act* (FNLMA) are bound to the procedures set out in their *Land Code* (if already ratified). These documents vary, but generally provide more flexibility to the First Nation to designate new cemeteries efficiently.

Land tenure becomes a more pressing concern when it involves the legal interests of individual Members, or groups of Members through Certificates of Possession (CPs). This is an important consideration both in managing private burials and in the rare cases that a cemetery has already been established on a parcel with a valid CP.

2.3.1 Managing Private Burials

It is generally advised to discourage burials on private land due to concerns regarding environmental contamination, communicable disease transmission, maintenance, access, and potential changes in land tenure over time. First Nations with and without Land Codes may have some jurisdiction to regulate this activity, either through a process set out in their Land Code or the creation of a zoning by-law under Section 81(1) of the *Indian Act*.

When it comes to burials that have already occurred, options vary based on the community and family's feelings towards relocation. If burials must remain on private lands, best practice is to note the burials within the Lands Department so they can be identified in any future proceedings related to the development or sale of the land. In any event, dealing with private burials is a very sensitive topic and should be led with care, cultural sensitivity and respect.



2.3.2 Cemeteries on Land with a Registered Certificate of Possession

If your main cemetery lies on CP land, the preferred course of action is to negotiate its amicable return to the First Nation. Negotiations involving land exchanges or other forms of compensation should be considered. SS 18(2) of the *Indian Act* can also be used in this situation, as under this section of the Indian Act lands may be set aside for a cemetery with or without consent of the CP holder, as long as the use of the lands are for the general welfare of the First Nation as a whole and compensation is adequate for the loss of their interest

Communities that are signatory to the *First Nations Land Management Act* with relevant laws may be able to achieve this through expropriation. However, this should be considered only if Members are being barred from visiting graves of family and is generally considered an extreme course of action. If all else fails, you may need to designate a new cemetery on community land.





3.0 Present

Regardless of where in the cemetery management journey your community finds itself, there will be pressing matters that need attention today. These pragmatic considerations can enable your cemetery to function at a high level and continue to serve your community. The following subsections explore how to keep a cemetery funded, staffed, well-documented, and empowered by relevant policies and plans. Finally, it explores interment options as a reminder to be monitoring trends in community preferences for future cemetery planning efforts.

3.1 Funding & Staffing

The operation and maintenance of a cemetery is expensive and often difficult work. Having the funds and staff to meet the needs of your community is vital.

3.1.1 Financial Planning

From a financial perspective, cemeteries are unique in that they can only generate revenue by reducing their limited inventory of plots, but have continuous costs to remain operational. These costs concentrate in three areas – operations, maintenance, and upgrades.

- Operations include all expenses incurred by the provision of burial services. Staff salaries and utility bills are examples of operations expenses.
- Maintenance includes expenses associated with grounds upkeep, keeping equipment in working order, and the servicing of amenities like benches and artwork.
- Upgrades include replacing or conducting major repairs to part of your cemetery. The biggest expense in this category is generally expansions when there are no more available plots.

Maintaining the funds to pay for these expenses is a core part of cemetery management. Some communities charge user fees to help subsidize the financial burden that a cemetery can place on a First Nation. This generally involves fees to reserve plots, conduct burials, provide funerary services, or similar.



From what we have heard at our engagement session, over 60% of the engagement participants do not charge their Members fees associated with being buried in their community's cemetery. However, decisions about whether or not to charge user fees, who they apply to, and how much they are, vary from community to community. Here are some questions to consider when making this decision:

- Who will be permitted to be buried in your cemetery?
- Does your community have the own-source revenue to support the management of a cemetery long-term without user fees?
- What precedent are you setting today, and how will it impact future administrations?
- Are there funds available to invest now, in order to pay for cemetery maintenance over time?
- If fees only apply to non-Members, does this include community members living on reserve who are Members of other First Nations?
- Will there be a tiered approach to fees? (i.e., non-Members, status Members, community members, descendants, non-status family members, etc.)

In addition to user fees and own source revenue, there are some funds and grants available for cemetery-related activities in Ontario. These are generally one-time grants and tied to specific objectives. The reality of cemetery management on reserve today, is that applying for funding is a major part of keeping burial places well-maintained. The good news is that cemeteries are a combination of a public service, an asset to be managed, a culture and heritage resource, and even a greenspace. This means that there are a wide variety of programs that cemetery management could fall under. The following table highlights some financial supports that are available at the time of writing (2026).



Table 2: Available Financial Supports for Cemetery Management

Name	Eligibility	Amount	Link
Residential Schools Missing Children Community Support Fund	If you can connect your work to one of the 140 residential schools included in the Indian Residential Schools Settlement Agreement, you may be able to access this fund.	The maximum amount payable is \$3 million annually.	https://www.rcaanc-cirnac.gc.ca/eng/1622742779529/1628608766235
Indigenous Services Canada's (ISC) Capital Facilities and Maintenance Program (CFMP)	Cultural and recreational facilities are one type of asset eligible for this fund. This can include cemeteries, particularly if you can demonstrate that there is a threat to health and safety from letting the cemetery go underfunded.	The fund is approximately \$2 billion per year nationally but most applications are for less than \$1.5 million.	https://www.sac-isc.gc.ca/eng/1100100016395/1533641696528
Indigenous Heritage — Museums Assistance Program	If you are conducting research, excavations, or mapping of your cemetery that could be connected to the preservation of cultural heritage, you may be able to access this fund.	Amount requested in application.	https://www.canada.ca/en/canadian-heritage/services/funding/museums-assistance/indigenous-heritage.html
Indigenous Community Capital Grants Program (Province of Ontario)	This fund supports infrastructure projects that provide social benefit to the community. Arguing the social benefit of a well-maintained cemetery should be possible, however note that applications are competitive with each other.	Funding amounts vary by project phase and whether or not you are a remote community. However, the first step is generally applying for \$75,000 to conduct a feasibility study on your cemetery upgrade or new build.	https://forms.mgcs.gov.on.ca/en/dataset/on00896
LABRC Land Use Plan Implementation Funding Initiative	Signatory First Nations who have enacted a Land Use Plan (LUP) through LABRC's Land Use Plan program. If you are also in need of a new LUP, you could go through this process, identify cemetery planning or upgrades in your LUP, and then use the implementation funding to support your cemetery management project.	Up to \$175,000	https://labrc.com/lup-support/

Finally, it's notable that a best practice for financial sustainability in cemetery management is the creation of an **operations and maintenance fund** that is invested in low-risk financial vehicles. The intention behind this is to be able to maintain and operate your cemetery on the returns of this investment fund. Acquiring the initial sum to facilitate this can be an obstacle but it is possible to grow the fund over time to reach this objective with the proper oversight and policies.





3.1.2 Staffing

Cemeteries can be managed by multiple departments, depending on how after-death care is prioritized and viewed in any given community. The most common departments to oversee cemetery management among OALA member communities are Public Works and Lands Departments.

When it comes to individual staff positions, the following list is organized in order of urgency. In other words, if you are starting your cemetery management journey you should consider hiring staff in this order.

1. **Caretaker(s)** – The most important staff members for cemetery management are the people on the ground who can effectively and respectfully tend to the graves and manage the landscaping. In many communities this is being performed by Members out of reverence for their loved ones. Formalizing this role helps create consistent outcomes and recognize the ongoing work. However, community involvement can be incredibly helpful and help build interest in the rehabilitation of a cemetery.
2. **Cemetery Manager** – Most cemeteries on reserve are overseen by the managers of other departments. In most communities, the population isn't large enough to support the salary of a dedicated Cemetery Manager, however formally placing cemetery management in someone's portfolio is an important step in building a cemetery program.
3. **Grant Writer** – At this point in your journey, it's likely that funding is the major bottle-neck. A part-time or full-time grant writer can help access the funds to enable you to grow your program.
4. **Data Steward or Archivist** – As mentioned above, managing burial and maintenance records is of central importance. A Data Steward would relieve the Cemetery Manager of these tasks, and work closely with the caretakers to keep accurate records.
5. **Operations Manager** – This staff member would coordinate the day-to-day activities of the cemetery including scheduling excavation, burials, and maintenance. This position is vital for the asset management component of cemetery planning.
6. **Communications Director** – Finally, it is worth considering creating a position specifically to liaise with community members about the cemetery, its services, fees, application requirements and more. This person would also be valuable in ensuring that the cemetery is operated in a culturally-informed manner.



3.2 Records Management

While many cemeteries start off with handwritten records and maps, efficient record keeping lies at the heart of cemetery management. Maintain a centralized database that encompasses a listing of every plot in the cemetery, interment details, grave ownership information, genealogical information, and maintenance records.

If possible, it is recommended to start with an excel spreadsheet to record plot details, track, sort and manage all the relevant information. There are various out-of-the-box third party software available for this purpose as well; however, perpetual license fees and account access management may be an issue.

Table 3: Sample Excel Spreadsheet to Record Details

Plot Number	Occupant	Next of Kin	Date of Internment	Maintenance Records	Text on Grave Marker
#0001	Last Name, First Name	Last Name, First Name; Contact Information	MM/DD/YYYY	Dates and activities or link to maintenance log	Recorded in case of weathering

The table above is an example of the columns you might add to a simple spreadsheet when building out cemetery records. Keep in mind that the more you standardize and separate out your information, the easier it will be to sort, filter, and edit over time. Keep backups of these records on an independent server for security.

Another important aspect of records management is gathering relevant information about the deceased without putting more strain on the family. Whenever possible, coordinate with other post-death services (like estates management) to access information that has already been provided.

3.3 Policies and Plans

When it comes to documents regulating cemeteries, it is recommended to start simple and build over time. By having simple policies and plans in place, it not only assists clarifying how things will be done but helps to build a business case for ongoing funding requirements. Any policies or by-laws can also serve as a communication tool with your community.

There are a few key documents that will help your community outline its approach to cemetery planning and regulate the operation of a cemetery in the long term. These are a **Cemetery Management Plan** and a **Cemetery and Burials Policy**.

- A **Cemetery Management Plan** is a community strategy that explores how a cemetery (or group of cemeteries) can be improved over time. A document like this is an opportunity to bring a community together and envision how a cemetery can best meet its needs. Ideally a plan like this would be created in advance of the Cemetery and Burials Policy so that they can align, however this is not always possible. For the practical management of cemeteries in the short-term a Cemetery and Burials Policy is a more crucial document, and it can be updated in the future if a Cemetery Management Plan is completed.



- **Cemetery and Burials Policies** set the framework for all interments on reserve and are a vital tool. They clarify processes, outline fees, and set expectations for Members, leaders, and staff alike. Over half of the participants at our engagement sessions indicated that they do not have a cemetery policy for their community. It remains to be an area that communities wish to further develop and implement. The following list outlines some common sections to consider including in your policy in plain language.

Template Table of Contents

1. **Introduction**
 - a. Why we have this policy
 - b. Definitions of important words
2. **Burial Plots and Costs**
 - a. How Members and/or non-Members can access or reserve a grave
 - b. How to transfer plots between people
 - c. The costs associated with different sizes and types of plots and burials
3. **Burial Rules**
 - a. How much time is needed to prepare for a burial
 - b. Rules for what can be buried with a body and if it can be moved
 - c. Rules related to cremations and ash scattering
 - d. Regulations related to burials outside of the cemetery, past and future
4. **Cemetery Upkeep**
 - a. What you can and cannot place on a grave
 - b. The size and materials allowed for grave markers or monuments
 - c. Rules relating to outside companies that may be hired to work on site
5. **Rules for Visitors**
 - a. Rules for driving, kids, pets and more in the cemetery
 - b. Visiting hours and hours of operation
6. **Forms**
 - a. All application forms and agreements that are referenced elsewhere in the policy



3.4 Interment Options

Understanding how people in your community want to be laid to rest is important for the design and location of your cemetery. The methods in which remains are handled generally differ between cultures and regions but fall into four groups: in-ground burial, natural burial, columbaria and scattering.

In-ground Burials

In-ground burials are common in Canada and can be either in a casket or urn. A single in-ground burial plot at a cemetery can hold a casket, along with several cremation urns if desired. Some cemeteries will also allow “double depth” burials (assuming the soil conditions allow for such a deep excavation), where one casket is buried at a depth of ~10 feet, with a vault covering over top, and a second casket will eventually be interred on top of that vault, with a new vault added, and filled in with topsoil and seed.

Natural Burials

Natural burials (also referred to as “green” burials) are similar to in-ground, but with the traditional aesthetic features removed. A natural burial is generally defined as a burial with little to no above ground markers (a group memorial feature is sometimes used, similar to a scattering garden), within an un-manicured landscape. No casket or burial vault is used, and the body is covered in a shroud. As well, preserving chemicals, such as formaldehyde, are not used and the body is allowed to decompose in the landscape naturally.

Natural burials are an excellent opportunity to promote the preservation of natural, undisturbed landscapes. Some cemeteries simply allow people to purchase a small plot of land to preserve it and ensure it remains untouched. Keep in mind however that additional environmental considerations are required for natural burials due to the interaction between the soil, water, and bodies.





Columbaria

Columbaria are stone structures intended to house cremation urns, that have become more popular in recent decades. The infrastructure requirements are higher because they involve the construction of a building that will need a foundation and maintenance over time, however the environmental requirements are only moderate because there is no way for the remains to interact with the soil or ground water. There are many options when it comes to columbaria, including smaller units that can house 3-4 urns in total, larger wall or “dome” units that have capacity for 50+ urns.

Scattering Gardens and Ossuaries

Scattering gardens are specially designed plant gardens that can tolerate or even benefit from a certain amount of cremated human remains. This is sometimes an option permitted in parts of a cemetery that may not meet the requirements for other types of final disposition (e.g., steep slopes). It is important to note that cremated remains are, in actuality, small bone fragments and the soil must be turned after each scattering. If the soil is not turned, the remains will become visible over time.

An ossuary is an underground vault, meant to communally store cremated remains. The remains are typically held in a soft bag and dropped into the ossuary opening. The infrastructure and environmental impacts for this are higher as it involves installing a concrete vault below ground and can typically extend below the typical depth of a casket burial (8-10' for a larger capacity).



4.0 Future

You will need to operate, maintain, fund, enhance, expand, and potentially replace your cemetery over time. Ideally, the future planning for your cemetery will take place within your community land use planning initiatives. The following sections speak to future considerations to bring with you on your cemetery planning journey.

4.1 Grounds Maintenance

Maintaining the land, water, and vegetation in your cemetery is a perpetual, and often challenging, task. Cemeteries are not often placed in prime locations that are flat, elevated above flood construction levels, and contain the appropriate soils and vegetation. This can make them particularly vulnerable to the impacts of climate change or periods of neglect. Informed grounds maintenance helps reduce these vulnerabilities and create a space that will serve the community for generations to come.

The following sections speak to important environmental considerations to take into account when you are creating your maintenance schedule and associated tasks. They are also a valuable reference when assessing the suitability of areas for expansion or new cemeteries.

4.1.1 Water

Water is both crucial and threatening to a cemetery. It supports the landscaping that makes cemeteries inviting spaces to visit the deceased, but can also problematically interact with burials and other features. The four important considerations in this category are:

1. The depth of the **water table** affects the types of burials that are possible. High water tables increase the likelihood of a flooded grave and may necessitate above ground burials (e.g., columbarium, mausoleum, etc.). Low water tables make options like double-depth burials a possibility. Best practices are to have the bottom of a standard grave no less than 0.5m above the highest water table depth. Keep in mind that water tables change depth over time and considerations for heavy rainfall are important.
2. Burials next to **watercourses** are common, however these features change course over time and may threaten cemeteries without appropriate setbacks. A 30m setback from the top of the embankment on a watercourse is recommended at a minimum, however elevation is a stronger protection in the long run.
3. Multiple factors can influence the **water level** of a lake, bay, or ocean. These include rising global temperatures, tides, and man-made dams. If your cemetery is adjacent to a water body and there is reason to believe it under threat of flooding or erosion, there are mitigation options (including elevating the cemetery with fill) however a relocation may eventually be necessary. A 30m setback from the high-water level is a good practice in this regard.
4. **Drainage** of rainwater is particularly important in cemeteries. Standing water can be a risk to health as well as the integrity of the burials. In addition to landscaping that directs water away from graves, it is also important to maintain large areas of permeable surfaces (i.e., avoiding excessive paving).



4.1.2 Earth

The soil composition and topography of a cemetery affects factors like excavation costs, flood risk, erosion, and decomposition rates. Consider the following when managing the earth in and around your cemetery.

1. In many parts of Ontario, soil is thin and **bedrock** can easily be exposed. This is a major impediment to burials and it is almost always preferable to avoid these areas if possible. If all available land faces the same constraint, fill can be brought in to artificially elevate the cemetery.
2. The ideal soil type of cemeteries is **sandy loam** for its combination of drainage and density. Sandier soils make excavations more expensive, and clays have poor drainage which can lead to flooding.
3. **Steep areas** are not suitable for burials without significant infrastructure investment, however their cultural significance could mean a scattering garden or other memorial is appropriate.
4. In-ground casket burials should be in areas with a **slope** of 8% or less. Burials in areas steeper than this will increase the difficulty of visitors navigating the cemetery on foot, increase erosion due to rainfall, and affect the cost of excavation for burials.

4.1.3 Vegetation

Vegetation is a popular component of cemeteries around the world. In addition to their aesthetic value, they can offer shade, soothing sounds/smells, and many have cultural importance.

1. Low-maintenance vegetation is crucial for keeping costs down. **Non-fruiting** trees and shrubs are recommended for this, and to avoid attracting pests.
2. It is very difficult to remediate situations where roots have grown into a grave. It is advised to separate trees from the main interment areas. A common approach is to plant new trees at the end of each row of plots to avoid blocking common vehicle and pedestrian pathways throughout the cemetery.
3. If there are plants with **cultural significance** in your community, consider engaging with Members about including them in cemetery landscaping. This may be an opportunity to connect cemetery management with other initiatives like cultural revitalization or on-the-land learning.
4. Using vegetation for **screening** (i.e., blocking sightlines) is a good practice that helps create privacy with relatively low-maintenance resources.



4.2 New Cemetery Site Selection

People, buildings and cemeteries all grow, change, and expand over time. As a truly permanent land use, you need to look to the future during site selection for a cemetery. This involves thinking about the capacity needs of the cemetery, plans for land development in the long term, and how people want to travel in the community.

4.2.1 How Big Does the New Cemetery Need to Be?

The size of a new cemetery is determined by a wide variety of factors including death rate, burial preferences, and competition. It is recommended to engage a professional during the preliminary design of a new cemetery to create an accurate estimate, however, the following information is provided for staff who need to do rough calculations for planning purposes.

New cemeteries should be able to accommodate demand for at least 50 years. In order to determine demand, you need to first calculate how many people eligible to be buried in the cemetery will die in the next 50 years, and then apply modifiers. These modifiers, include how people want to be buried and what proportion will choose your cemetery as their final resting place.

Step 1: Calculating Deaths

You likely have access to population projections either internally or through Indigenous Services Canada (ISC) or Statistics Canada. Finding an accurate death rate can be challenging, however in the absence of one you can use 8 deaths per 1,000 people per year⁴. Use this rate to calculate the number of total deaths in your community over the next 50 years.

Step 2: Calculating Demand

Not all people who die will be buried, and not all those who are buried will be buried in your cemetery. So, ask yourself these questions before proceeding:

- Are only Members eligible to be buried in the cemetery?
- Do most people choose to be buried or cremated? Is this trending up or down?
- Is there competition in your area from other cemeteries?

Next, you need to account for those whose bodies are not interred in any way. For example, those that donate their bodies to science, die in a war overseas, or have no next of kin to manage their burial. Anecdotally, the portion of people who fall in this category can be as high as 70%, however it's recommended to assume it's approximately 50%.

⁴ Death rates in Canada and Ontario have hovered around 8.0 since 2020.





Step 3: Estimate Interment Space

Once you have determined the anticipated demand for your cemetery, you need to determine the land required to satisfy demand. For every anticipated in-ground burial, allocate 4.5m² for a standard plot. For cremations, first determine the method of interment (see Section 3.4) and then determine the number of structures required to house the ashes. In both cases, extra space will need to be provided for roads, amenities, and buffers. As a rule of thumb, this comes out to an extra 20% for cemeteries with mainly in-ground burials or approximately 750 plots per acre.

Example Calculation

Let's take a community with the following assumptions:

- Only Members can be buried in the cemetery, and the second-generation cut-off has been removed from the Membership Code;
- There are no other cemeteries to compete locally;
- Most people prefer in-ground burials;
- The soil is not deep enough for double-depth burials;
- Population projections indicate that 300 Members will die in the next 50 years; and
- The current cemetery is at 100% capacity.

In this situation, the minimum area of a new cemetery would be:

300 people divided by 2 (to account for people who will not be formally interred) multiplied by 4.5 (the average area of a burial plot) multiplied by 1.2 (to account for paths and buffers).

$$\text{Total Area} = \frac{300 * 4.5 * 1.2}{2} \text{ or } 810 \text{ m}^2$$

This estimate does not include space for administrative or maintenance buildings, memorials, columbaria, or decorative landscaping but it gives a useful starting point for understanding the minimum size of a future cemetery.



4.2.2 Where Should the New Cemetery be Located?

When it comes to locating a cemetery within the context of a growing community, you need to consider **growth, proximity, circulation, and servicing**. This is in addition to the environmental considerations outlined in Section 4.1, and any cultural considerations unique to your community.

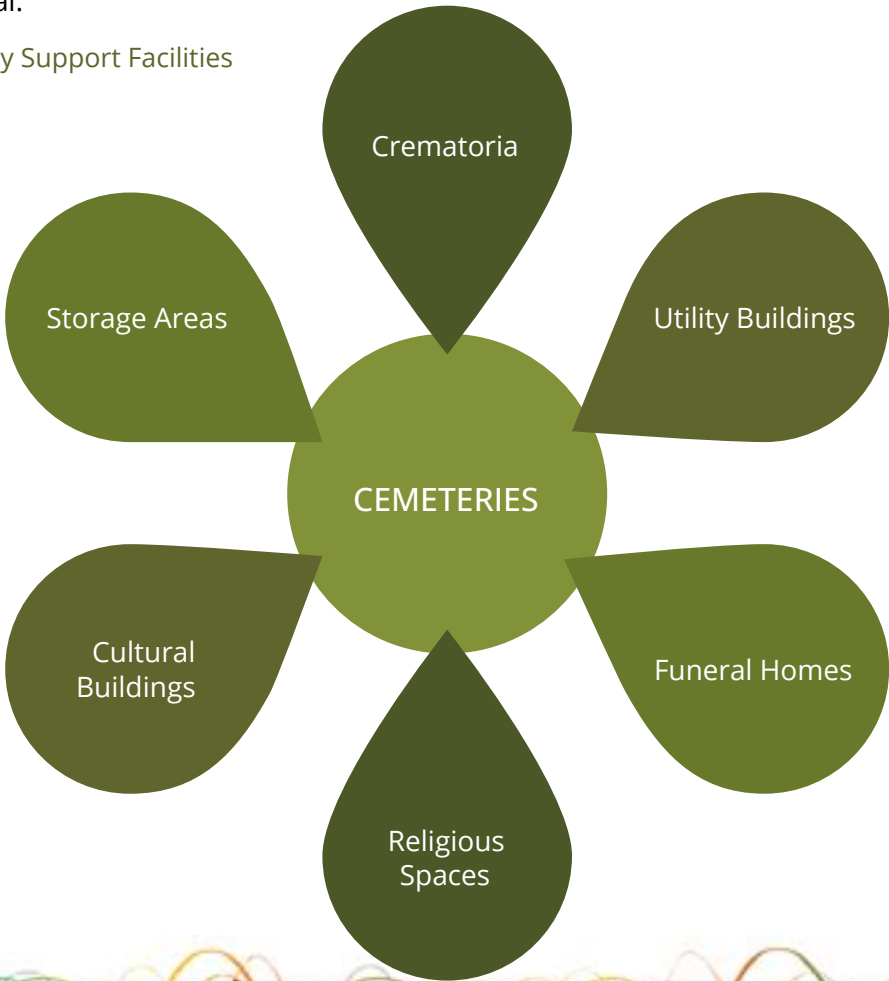
Growth

Understanding the long-term vision for development in your community can assist in selecting a new cemetery site. An ideal location will be accessible to community members without impeding future development opportunities. If your community has a Land Use Plan, this is the ideal document for this exercise. Without one, discussions with leadership and your Lands Department will likely reveal areas that are anticipated to be developed in the future.

Proximity

A cemetery is one component of the larger system of funerary services which also includes funeral homes, crematoria, cultural buildings and more. Depending on the funerary practices in your community, a cemetery may be ideally situated adjacent to certain other facilities. Some communities choose to situate cemeteries next to important gathering places so that funerals can be hosted more easily. Others will place cemeteries close to the local funeral home in order to minimize the distance that caskets need to travel for burial.

Figure 1: Cemetery Support Facilities



Circulation

Cemeteries should be accessible by multiple modes of transportation but not directly in travel routes. People of all ages will have reason to visit your cemetery and placing it in a transit accessible area or within walking distance of your community core supports those who do not have access to a personal vehicle. At the same time, cemeteries are places of quiet reflection and assessing travel routes in your community can help avoid trespassing. For example, a cemetery between a residential area and a bus stop is sure to create circulation and trespassing issues.

Servicing

Finally, there are multiple reasons why your cemetery may need to be serviced by electrical, water, and wastewater utilities. Visitor and staff amenities will require these services, however even for cemeteries without any facilities it can be important. This is because vandalism and trespassing are common issues in cemeteries and the most common solutions to these are improved lighting and surveillance, both of which require electricity.

This being said, servicing is not always a requirement in the short-term and it may be appropriate in your community to designate a new cemetery in an area that will not be serviced for some time if the risk of vandalism and trespassing is low.



4.3 Communication & Engagement

Effective communication and engagement with community members not only provides valuable insights but also mitigates future conflicts. These activities can shed light on burial preferences, important cultural protocols, and identify people who may be willing to volunteer as part of your cemetery program. Additionally, decisions related to the deceased can be contentious if community members do not feel that they have been adequately engaged in advance. Decisions related to relocating burials, charging fees, or expanding cemeteries in particular, should all be developed with the community's values at the forefront.

Best practice in this area is to provide opportunities for community engagement early and often. Particularly if you are pursuing new policies or plans (see Section 3.3) this is an ideal opportunity to bring the community together and start a conversation about the future of your cemetery. Keep in mind that these can be sensitive topics and are best addressed in safe spaces. Depending on your community, it may be appropriate to conduct group engagement, or family meetings and individual interviews may be the way to go.

In either case, you'll want to concentrate your discussions on matters of culture, access, design and fees. These are the areas where a community member with local knowledge but no technical background in cemetery management can provide the most valuable input. Engagement activities that have proved useful in the past include:

- **Mapping Exercises** – A cemetery map, aerial imagery, and sticky notes can go a long way in facilitating a discussion about your cemetery. Participants can be prompted to indicate areas they enjoy visiting, avoid, or would be interested in seeing changed.
- **Digital Surveys** – Members who do not live locally may still have an interest in being buried at your cemetery, or will have ancestors there already. A digital survey helps engage these Members, particularly if your community has a strong virtual presence. Keep in mind, however, that these surveys are less effective with older populations and you may need to consider printing and mailing the survey in some cases.
- **Activity Stations** – If you are hosting a group engagement, unmonitored activity stations can help reduce social barriers to participation by allowing community members to provide input independently. Common options include comment boxes, interment options diagrams, and polls that use colour-coded stickers to indicate support.



5.0 Conclusion

Cemetery planning may not be a glamorous task but, done well, it provides a vital community service that can be appreciated by Membership for generations to come. Lying at the intersection of culture, asset management, social services, and design, cemeteries have been stewarded places for thousands of years. However you came to be in charge of your First Nation's cemeteries, it should be clear after reading this that there are only a handful of fundamental principles that you need to keep top-of-mind. **Keep good records, balance the budget, value your caretakers, and talk to your community early and often.** The rest will come with time and the occasional support of licensed professionals.

5.1 Further Reading

- [Bereavement Authority of Ontario](#)
- [Ontario Association of Cemetery and Funeral Professionals](#)
- [Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c. 33](#)
- [Independent Special Interlocutor for Missing Children and Unmarked Graves and Burial Sites associated with Indian Residential Schools](#)

