BAO | BEREAVEMENT AUTHORITY OF ONTARIO
L'AUTORITÉ DES SERVICES FUNÉRAIRES ET CIMETIÈRES DE L'ONTARIO

100 Sheppard Avenue East, Suite 505, Toronto, Ontario, M2N 6N5
Tel: 647-483-2645 Toll-free: 1-844-493-6356
Fax: 647-748-2645
Email: info@thebao.ca

SAMPLE CEMETERY BY-LAWS

The Bereavement Authority of Ontario is providing you with a series of sample by-laws which have been approved by the Registrar, *Funeral, Burial and Cremation Services Act, 2002* (FBCSA), Bereavement Authority of Ontario. You may adopt the by-laws that pertain to your individual operation and use them provided you follow the process required by the FBCSA and Regulations with regard to Notice requirements.

There is "no standard sets" of by-laws that pertain to the activities of every cemetery in Ontario. Each cemetery operation is unique and requires specific by-laws to reflect its uniqueness. For example, cemeteries operated as "religious" cemeteries may have by-laws that require rights holders or individuals buried in the cemetery to be of a specific faith. Municipal cemeteries may require those buried within the cemetery to be local residents. Some cemeteries may have by-laws that permit upright monuments while other cemeteries may have by-laws that prohibit upright monuments and only permit markers set flush and level with the ground. The hours of operation of one cemetery may be different from those of another cemetery etc.

TABLE OF CONTENTS

Section A: DEFINITIONS

Section B: SAMPLE BY-LAWS PERTAINING TO GENERAL INFORMATION

Section C: SAMPLE BY-LAWS FOR THE SALE AND TRANSFER OF INTERMENT RIGHTS

Section D: SAMPLE BY-LAWS PERTAINING TO BURIAL OR SCATTERING OF CREMATED REMAINS

Section E: SAMPLE BY-LAWS PERTAINING TO MEMORIALIZATION

Section F: SAMPLE BY-LAWS PERTAINING TO CARE AND PLANTING

Section G: SAMPLE BY-LAWS OUTLING ITEMS THAT ARE PROHIBITED AND PERMITTED

Section H: SAMPLE CONTRACTOR/MONUMENT DEALER BY-LAWS

Section I: SAMPLE BY-LAWS FOR MAUSOLEA

Section J: SAMPLE BY-LAWS FOR COLUMBARIA

The following is suggested wording for cemetery by-laws that you may adopt for your location.

These by-laws are the rules and regulations that govern (**insert Cemetery Name**) and have been approved by the Registrar, *Funeral, Burial and Cremation Services Act, 2002* (FBCSA), Bereavement Authority of Ontario.

A. DEFINITIONS

This is a suggested list of definitions which may be modified to suit the needs of individual cemeteries. You may wish to include more definitions from the *Funeral Burial & Cremation Services Act, 2002* or Ontario Regulation 30/11.

Burial: The opening and closing of an inground lot or plot for the disposition of human remains or cremated human remains.

By-laws: The rules and regulations under which the Cemetery (and/or Crematorium) operates.

Care and Maintenance Fund: It is a requirement under the FBCSA that a prescribed amount or a percentage of the purchase price (excluding tax) of all interment and scattering rights sold; and prescribed amounts for monuments and markers is contributed into the care and maintenance fund. If no scattering rights are sold but scattering is permitted a prescribed amount must be contributed to the fund when the scattering is conducted. Interest earned from this fund is used to provide care and maintenance of lots, plots, markers and monuments at the cemetery.

Contract: For purposes of these by-laws**,** all purchasers of interment rights must sign a contract with the cemetery, detailing obligations of both parties and acceptance of the cemetery by-laws.

Corner Posts: Shall mean any stone or other land markers set flush with the surface of the ground and used to indicate the location of a lot or plot.

Crypt: An individual compartment in a mausoleum for the entombment of human remains.

Grave: (Also known as Lot) means any inground burial space intended for the interment of a child, adult or cremated human remains.

Interment Right: The right to require or direct the interment of human remains or cremated human remains in a grave, lot, niche or crypt and direct the associated memorialization.

Interment Rights Certificate: The document issued by the Cemetery to the purchaser once the interment rights have been paid in full, identifying ownership of the interment rights.

Interment Rights Holder: Any person designated to hold the right to inter human remains in a specified lot.

Lot: For the purposes of these By-Laws a lot is a single grave space.

Marker: Shall mean any permanent memorial structure that is set flush and level with the ground, and used to mark the location of a burial lot.

Monument: Any permanent memorial projecting above the ground installed within the designated space to mark the location of a burial or lot.

Niche: An individual compartment in a columbarium for the entombment of cremated human remains.

Plot: For the purposes of these by-laws, a plot is a parcel of land, sold as a single unit, containing multiple lots.

Scattering: Shall mean the act of spreading of cremated remains over a designated area within a cemetery with the knowledge and permission of the cemetery operator and in keeping with the cemetery's by-laws.

Scattering Rights Holder: Any person designated to hold the right to scatter cremated human remains in a specified lot or other designated area within the cemetery.

B. SAMPLE BY-LAWS PERTAINING TO GENERAL INFORMATION

Hours of Operation: (CEMETERY OPERATOR TO INSERT THEIR SPECIFIC HOURS OF OPERATION; OFFICE HOURS AND VISITING HOURS)

Visitation Hours:
Office Hours:
Burial Hours:

General Conduct:
The cemetery reserves full control over the cemetery operations and management of land within the cemetery grounds.

No person may damage, destroy, remove or deface any property within the Cemetery.

All visitors should conduct themselves in a quiet manner that shall not disturb any service being held.

By Law Amendments:
The cemetery shall be governed by these by-laws, and all procedures will comply with the *Funeral Burial & Cremation Services Act, 2002* (FBCSA) and Ontario Regulation 30/11, which may be amended periodically.

All by-law amendments must be:
A) Published once in a newspaper with general circulation in the locality in which the cemetery is located;
B) Conspicuously posted on a sign at the entrance of the cemetery; and
C) Delivered to each supplier of markers who has delivered a marker to the cemetery during the previous year, if the by-law or by-law amendment pertains to markers or their installation.

All by-laws and by-law amendments are subject to the approval of the Registrar, Bereavement Authority of Ontario.

Liability:
The cemetery operator will not be held liable for any loss or damage, without limitation (including damage by the elements, Acts of God, or vandals) to, any lot, plot, columbarium niche, mausoleum crypt, monument, marker, or other article that has been placed in relation to an interment or scattering right save and except for direct loss or damage caused by gross negligence of the cemetery.

Public Register:
Provincial legislation – Section 110 of Ontario Regulation 30/11 requires all cemeteries and crematoriums to maintain a public register that is available to the public during regular office hours.

Pets or Other Animals:
Pets or other lower animals, including cremated animal remains, are not allowed to be buried on cemetery grounds.

Right to Re-Survey:
The Cemetery has the right at any time to re-survey, enlarge, diminish, re-plot, change or remove plantings, grade, close pathways or roads, alter in shape or size, or otherwise change all or any part of the cemetery, subject to approval of the appropriate authorities.

Notice of Resale and Transfer of Interment or Scattering Rights:

Note: The FBCSA and Ontario Regulation 30/11 now provides the cemetery operator with two choices regarding the resale of interment rights; 1) permit the resale of interment or scattering rights to a third party, or 2) prohibit the resale of interment or scattering rights and require the cemetery operator to repurchase interment and scattering rights at current price list amounts. Each cemetery operator may choose either option that pertains to their particular cemetery.

If a cemetery operator wishes to **permit** resale, they do not require a by-law specifying this option. As of July 1, 2012, it is automatically permitted under the new legislation. The suggested preference is to have a by-law such as;

The cemetery operator permits the interment or scattering rights holder to sell or transfer their interment rights or scattering rights to a third party, at no more than the current price listed on the cemetery price list, as long as the sale or transfer is conducted through the cemetery operator and the purchaser meets the qualifications and requirements as outlined in the cemetery operator's by-laws.

OR

Interment rights holders may first offer the interment rights to the cemetery operator. If the cemetery operator does not wish to re-purchase the interment rights, the interment right may be sold on the to a third party for no more than the current price listed on the cemetery price list, as long as the sale or transfer is conducted through the cemetery operator and the purchaser meets the qualifications and requirements as outlined in the cemetery operator's by-laws.

If the cemetery operator wishes to **prohibit** resale of interment rights or scattering rights to a third party, they must have a by-law approved by the Registrar as of July 1, 2012 which prohibits such activity, such as;

The cemetery operator prohibits the resale of interment or scattering rights to a third party and will repurchase these rights at the price listed on the current price list. Transfers of interment or scattering rights cannot be prohibited as long as the purchaser meets the qualifications and requirements as outlined in the cemetery operator's by-laws.

The cemetery operator prohibits the resale of interment rights to a third party and is not required to repurchase unused interment rights in a plot (more than one lot) if one of the interment rights in the plot has been exercised.

The cemetery operator prohibits the resale of scattering rights to a third party and is not required to repurchase unused scattering rights in a scattering ground if other scattering interment rights in the same scattering ground have been exercised.

C. SAMPLE BY-LAWS FOR THE CANCELLATION OR RESALE OF INTERMENT RIGHTS

Purchasers of interment or scattering rights holders acquire only the right to direct the burial of human remains and the scattering of cremated human remains, and the installation of monuments, markers and inscriptions, subject to the conditions set out in the cemetery by-laws. In accordance with cemetery by-laws, no burial, entombment, scattering, or installation of any monument, marker, inscription, or memorialization is permitted until the interment rights have been paid in full. An interment rights certificate will be issued to the interment rights holder(s) when payment has been made in full. The purchase of interment rights is not a purchase of Real Estate or real property. An interment rights holder wishing to resell their interment rights may advise the cemetery operator of their intention prior to seeking a third party buyer for their interment rights.

Cancellation of Interment Rights within 30 Day Cooling-Off Period:

- A purchaser has the right to cancel an interment or scattering rights contract within thirty (30) days of signing the interment or scattering rights contract, by providing written notice of the cancellation to the cemetery operator. The cemetery operator will refund all monies paid by the purchaser within thirty (30) days from the date of the request for cancellation.

Cancellation of Interment or Scattering Rights after the 30 Day Cooling-Off Period:

- Upon receiving written notice from the purchaser of the interment or scattering rights, the cemetery operator will cancel the contract and issue a refund to the purchaser for the amount paid for the interment or scattering rights less the appropriate amount that is required to be deposited into the Care and Maintenance Fund. This refund will be made within thirty (30) days of receiving said notice. If the interment rights certificate has been issued to the interment rights holder(s), the certificate must returned to the cemetery operator along with the written notice of cancellation.

- If any portion of the interment or scattering rights has been exercised, the purchaser, or the interment rights holder(s) are not entitled to cancel the contract or re-sell the interment or scattering rights.

Resale of Interment or Scattering Rights after 30 Day Cooling-Off Period:

- Unless the interment or scattering rights have been exercised the purchaser retains the right to cancel the contract or re-sell the interment or scattering rights. Once payment for the interment or scattering rights has been made in full, and an interment rights certificate has been issued, the interment or scattering rights holder(s), as recorded on the cemetery records, has right to re-sell the interment rights. Any resale of the interment right shall be in accordance with the requirements of the cemetery by-laws and in keeping with the FBCSA.

- If any portion of the interment or scattering rights has been exercised, the purchaser, or the interment rights holder(s) are not entitled to re-sell the interment or scattering rights.

Care and Maintenance Fund Contributions:

- It is a requirement under the FBCSA that a prescribed amount or a percentage of the purchase price (excluding tax) of all interment and scattering rights sold; and prescribed amounts for monuments and markers is contributed into the care and maintenance fund. If no scattering rights are sold but scattering is permitted a prescribed amount must be contributed to the fund when the scattering is conducted. Interest earned from this fund is used to provide care and maintenance of lots, plots, markers and monuments at the cemetery. Contributions to the care and maintenance fund are not refundable except when interment or scattering rights are cancelled within the 30 day cooling off period.

Permit or prohibit resale of interment or scattering rights to a third party:

NOTE: ALL RESALES OF INTERMENT OR SCATTERING RIGHTS MUST BE CARRIED OUT THROUGH THE CEMETERY OPERATOR.

A cemetery operator may choose to either permit the interment rights or scattering rights holder(s) to:
a) Re-sell the interment or scattering rights to a third party; or
b) Prohibit the resale to a third party and repurchase the rights themselves.

An operator is required to adopt the procedural by-law below that pertains to the chosen option as described above. Note: If the cemetery operator wishes to prohibit an interment rights holder or scattering rights holder from selling an interment or scattering rights to a third party, the cemetery operator's by-laws must clearly prohibit such activity from taking place.

Requirements if resale of interment rights or scattering rights is <u>permitted</u> by the cemetery operator

- The interment or scattering rights holder(s) intending to sell their rights shall provide the following documents to the cemetery operator so that the operator can confirm the ownership of the rights and provide the third party purchaser with a the required certificate etc.:
    1. an interment or scattering rights certificate endorsed by the current rights holder
    2. if the resale involves interment rights, a written statement of the number of lots that have been used in the plot and the number of lots that remain available
    3. if the resale involves scattering rights, a written statement of the number of scatterings rights
    4. any other documentation in the interment or scattering rights holder(s) possession relating to the rights

- The third party purchaser will be provided with the following documents by the cemetery operator:
    1. An interment or scattering rights certificate endorsed by the current rights holder
    2. A copy of the cemetery's current by-laws
    3. A copy of the cemetery's current price list
    4. If the resale involves interment rights, a written statement of the number of lots that have been used in the plot and the number of lots that remain available
    5. if the resale involves scattering rights, a written statement of the number of scattering rights available
    6. any other documentation in the interment rights holder(s) possession relating to the rights

- The cemetery operator will require:
    1. Require a statement signed by the rights Holder(s) selling the interment or scattering rights acknowledging the sale of the interment rights to the third party purchaser
    2. Require confirmation that the person selling the interment or scattering rights is the person registered on the cemetery records and that they have the right to re-sell the Interment or scattering rights
    3. Record the date of transfer of the interment or scattering rights to the third party;
    4. The name and address of the third party purchaser(s)
    5. A statement of any money owing to the Cemetery Operator in respect to the Interment or Scattering Rights.

- Once the endorsed certificate and all required information has been received by the cemetery operator from the rights holder(s), the cemetery operator will issue a new interment or scattering rights certificate to the third party purchaser.

- Upon completion of the above listed procedures, and upon the issuance of the new interment or scattering rights certificate, the third party purchaser or transferee(s) shall be considered the current interment or scattering rights holder(s) of the interment or scattering rights, and the resale or transfer of the interment or scattering rights shall be considered final in accordance with the cemetery by-laws and the FBCSA.

- The cemetery operator may charge an administration fee for the issuance of a duplicate certificate in accordance with the price listed on the cemetery operator's current price list.

- The cemetery operator does not prohibit the resale of an interment or scattering rights and may repurchase the interment or scattering rights from the rights holder(s) if the cemetery operator so desires and may negotiate a purchase price so long as the seller acknowledges being aware of the cemetery operators current price list amounts for interment and scattering rights.

Requirements if resale is <u>prohibited</u> within cemetery by-laws:

- If a rights holder(s) wishes to re-sell the interment or scattering rights and the cemetery operator's by-laws prohibit the third party resale of interment or scattering rights, the rights holder(s) must make the request to the cemetery operator in writing. The cemetery operator will repurchase the interment or scattering Right at the price listed on the cemetery operator's current price list less the Care & Maintenance Fund contribution made at the time of purchase. The re-purchase and payment to the rights holder requesting the sale must be completed within 30 days of the request.

- The interment or scattering rights holder requesting the resale of the rights must return the interment or scattering rights certificate to the cemetery operator and the rights holder(s) must endorse the interment or scattering rights certificate, transferring all rights, title and interest back to the cemetery operator. The appropriate paperwork must be completed before the cemetery operator reimburses the rights holder(s).

D. SAMPLE BY-LAWS PERTAINING TO BURIAL OR SCATTERING OF CREMATED REMAINS

- Interment or scattering rights holder(s) must provide written authorization prior to a burial, scattering, or an entombment taking place. Should the interment or scattering rights holder be deceased, authorization must be provided in writing by the person authorized to act on behalf of the interment rights holder i.e. Personal Representative, Estate Trustee, Executor or next of kin.

- A burial permit issued by the Registrar General or equivalent document showing that the death has been registered with the province must be provided to the cemetery office prior to a burial, scattering or entombment taking place. A Certificate of Cremation must be submitted to the cemetery office prior to the burial of cremated remains or scattering of cremated remains taking place.

- In accordance with the FBCSA the purchaser of interment or scattering rights must enter into a cemetery contract, providing such information as may be required by the cemetery operator for the completion of the contract and the public register prior to each burial or entombment of human remains, or each scattering of cremated human remains.

- Payment must be made to the cemetery before a burial can place.

- The cemetery shall be given __ (insert number of advanced hours you require) __business hours of notice for each burial of human remains or scattering of cremated human remains.

- The opening and closing of graves, crypts and niches or the scattering of cremated remains may only be conducted by cemetery staff or those designated to do work on behalf of the cemetery.

- Cremated remains may be scattered within a designated area of the cemetery.

- Cremated remains are not permitted to be scattered on a grave.

- A scattering rights contract must be completed and the payment of the scattering fee must be received before the scattering of cremated human remains can take place.

- Once scattered cremated remains cannot be retrieved.

- Human remains may be disinterred from a lot provided that the written consent (authorization) of the interment rights holder has been received by the cemetery operator and the prior notification of the medical officer of health. A certificate from the local medical officer of health must be received at the cemetery office before the removal of casketed human remains may take place. A certificate from the local medical officer of health is not required for the removal of cremated remains.

- In special circumstances the removal of human remains may also be ordered by certain public officials without the consent of the interment rights holder and/or next of kin(s).

If your existing cemetery by-laws currently stipulate the number of casket interments and/or cremated remains interments allowed per grave, this must also be included in your revised by-laws.

E. SAMPLE BY-LAWS PERTAINING TO MEMORIALIZATION

- No memorial or other structure shall be erected or permitted on a lot until all charges have been paid in full.

- No monument, footstone, marker or memorial of any description shall be placed, moved, altered, or removed without permission from the cemetery operator.

- Minor scraping of the monument base of an upright monument due to grass/lawn maintenance is considered to be normal wear.

- The cemetery operator will take reasonable precautions to protect the property of interment rights holders, but it assumes no liability for the loss of, or damage to, any monument, marker, or other structure, or part thereof.

- The cemetery operator reserves the right to determine the maximum size of monuments, their number and their location on each lot or plot. They must not be of a size that would interfere with any future interments.

- All foundations for monuments and markers shall be built by, or contracted to be built for, the cemetery operator at the expense of the interment rights holder.

- Should any monument or marker present a risk to public safety because it has become unstable, the cemetery operator shall do whatever it deems necessary by way of repairing, resetting, or laying down the monument or marker or any other remedy so as to remove the risk.

- The cemetery operator reserves the right to remove at its sole discretion any marker, monument, or inscription which is not in keeping with the dignity and decorum of the cemetery as determined by the trustees.

- A monument, private mausoleum, or other structure shall be erected only after the specific design plans have been approved by the cemetery operator including: dimensions, material of structure, construction details, and proposed location.

- In keeping with the cemetery by-laws only one monument shall be erected within the designated space on any lot.

- The minimum thickness for flat markers including footstones is 4 inches or 10 cm.

- All monuments and markers shall be constructed of bronze or natural stone (i.e. granite).

- No monument shall be delivered to the cemetery for installation until the monument foundation has been completed, and the interment rights holder(s) and/or marker retailer have been notified by the cemetery operator.

- Markers and footstones of bronze or granite are permitted with size and quantity restrictions according to cemetery by-laws and the placement of such memorials shall not interfere with future interments.

Single lot maximum: **(insert sizing based on standards in place at your cemetery)**
Double lot maximum: **(insert sizing based on standards in place at your cemetery)**
Cremation lot maximum: **(insert sizing based on standards in place at your cemetery)**

F. SAMPLE BY-LAWS PERTAINING TO CARE AND PLANTING

A portion of the price of interment or scattering rights is trusted into the Care and Maintenance Fund. The income generated from this fund is used to maintain, secure and preserve the cemetery grounds. Services that can be provided through this fund include:

- Re-levelling and sodding or seeding of Lots or scattering grounds

- Maintenance of cemetery roads, sewers and water systems
- Maintenance of perimeter walls and fences
- Maintenance of cemetery landscaping
- Maintenance of mausoleum and columbarium
- Repairs and general upkeep of cemetery maintenance buildings and equipment
- No person other than cemetery staff shall remove any sod or in any other way change the surface of the burial lot in the cemetery**.**
- No person shall plant trees, flower beds or shrubs in the cemetery except with the approval of the cemetery.
- Flowers placed on a grave for a funeral shall be removed by the cemetery staff after a reasonable time to protect the sod and maintain the tidy appearance of the cemetery.

G. SAMPLE BY-LAWS OUTLING ITEMS THAT ARE PROHIBITED AND PERMITTED

The cemetery reserves the right to regulate the articles placed on lots or plots that pose a threat to the safety of all interment rights holders, visitors to the cemetery and cemetery employees, prevents the cemetery from performing general cemetery operations, or are not in keeping with the respect and dignity of the cemetery. Prohibited articles will be removed and disposed of without notification.

To assist interment rights holders, the following is an example of articles that you may wish to prohibit from being placed on lots within the cemetery: articles made of hazardous materials such as non-heat resistant glass (excludes glass attached to monuments), ceramics, or corrosive metals; loose stones or sharp objects; trellises or arches; chairs or benches

- The cemetery reserves the right to disallow or remove quantities of memorial wreaths or flowers considered to be excessive and that diminishes the otherwise tidy appearance of the cemetery.

- Memorial wreaths may be placed in the cemetery only between the _____of _____ and the _____of _____ (**cemetery to insert dates specific to their individual operation**). In order to prepare the grounds for spring, wreaths must be removed prior to (**cemetery to insert date specific to their individual operation**). Wreaths not removed by (**suggested date**) will be removed and disposed of by the Cemetery without notification.

H. SAMPLE CONTRACTOR/MONUMENT DEALER BY-LAWS

Any contract work to be performed within the cemetery requires the written pre-approval of the interment rights holder and the cemetery operator before the work may begin. Pre-approval includes but is not limited to: landscaping, delivery of monuments and markers, inscriptions, designs, drawings, plans and detailed specifications relating to the work, proof of all applicable government approvals and permits, the location of the work to be performed. It is the responsibility of all contractors to report to the cemetery office and provide the necessary approvals before commencing work at any location on the cemetery property.

Prior to the start of any said work, contractors must provide proof of (**any or all may apply depending on your specific operation):**

WSIB coverage
Occupational Health and Safety compliance standards
Environmental Protection
WHMIS
Evidence of liability insurance of not less than $_____(an amount deemed appropriate by your individual operation; such as $2 million; $3 million, etc.)

- All cemetery by-laws apply to all contractors and all work carried out by contractors within the cemetery grounds.

- Contractors, monument dealers and suppliers shall not enter the cemetery in the evening, weekends or statutory holidays, unless approval has been granted by the cemetery operator.

- No work will be performed at the cemetery except during the regular business hours of the cemetery.

- Contractors shall temporarily cease all operations if they are working within 100 metres of a funeral until the conclusion of the service. The cemetery reserves the right to temporarily cease contractor operations at their sole discretion if the noise of the work being performed by the contractor is deemed to be a disturbance to any funeral or public gathering within the cemetery.

- Contractors, monument dealers and suppliers shall lay wooden planks on the burial lots and paths over which heavy materials are to be moved in order to protect the surface from damage.

I. SAMPLE MAUSOLEUM BY-LAWS

Note: A cemetery operator's by-laws specific to mausoleums will vary from location to location and are dependent on site conditions, building features, building materials, etc. The following are general examples of by-laws that you may use as they pertain to your operation:

- Full payment must be made to the cemetery operator before an entombment may take place

- Only the cemetery operator may open and seal crypts for entombments. This applies to the inside sealer and the crypt front.

- To ensure quality control, desired uniformity and standard of workmanship, the cemetery operator reserves the right to inscribe all crypt fronts or install all lettering, vases, adornments, or any other approved attachment.

- Photographs are permitted and must conform to the design, material and standards of the building.

**If the current by-laws stipulate the size of lettering for inscriptions, adornments, etc., this information should be carried forward in the revised by-laws.

J. SAMPLE COLUMBARIUM BY-LAWS

Note: A cemetery operator's by-laws specific to columbarium niche structures will vary from location to location and are dependent on site conditions, building features, building materials, etc. The following are general examples of by-laws that you may use as they pertain to your operation:

- Payment must be made to the cemetery operator before an interment may take place
- Only the cemetery operator may open and seal niches for interments. This applies to the inside sealer and the niche front.
- To ensure quality control, desired uniformity and standard of workmanship, the cemetery reserves the right to inscribe all niche fronts or install all lettering, vases, adornments, or any other approved attachment.
- No person other than cemetery staff shall remove or alter niche fronts.