

Comment (nearly verbatim)	Translation	Answer
<p>So the health and welfare concerns of the bill don't appear to be addressed.</p>	<p>Is there adequate research and proof that NOR is safe from a public health and safety perspective.</p>	<p><i>Is it safe? Yes.</i> The process kills bacteria and viruses, including COVID-19. Farmers have used mortality composting for many decades to safely dispose of deceased livestock and control odor.</p> <p><i>Has it been tested and validated scientifically? Yes.</i> Research at Western Carolina University and Washington State University (WSU) has demonstrated the viability of NOR as a natural method of disposition for humans, and WSU’s Soil Science Department conducted a pilot study which proved the safety and efficacy of the process. Long before it was ever applied to human bodies, farmers also safely used mortality composting and universities have tested it exhaustively.</p> <p>It's also important to remember how cadaveric caloricity comes into play. The NOR process uses large vessels to hold human remains which are combined with straw, wood chips, and other natural materials. The decomposing process creates heat of over 131F, which kills viruses, bacteria, and pathogens... The resulting soil is safe for gardens, trees and scattering.</p>

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<p>The facility, the facility that the type of facility that would be utilized since it's going to be different from the from the cremation facility would be something that the board would like more information and guidance from the legislature</p>	<p>The board (and staff) does not have the expertise to regulate NOR equipment or facilities.</p>	<p>As is the case with other regulatory changes, the new law will require the board and its staff to learn some new things. Generally, these sorts of changes are accomplished through research, knowledge sharing with other states and training with industry groups. NOR has blossomed into accepted funerary practice – it’s even featured this year by the National Association Funeral Directors (NFDA) as part of its “Virtual Cremation Success Seminar.” Right now, you can find state inspector checklists for NOR facilities on the internet. The changes required to implement HB 1060 are not Herculean. That’s why – as indicated in its comment letter – OCO says it can handle regulating the new disposition process at its existing resource level.</p>
<p>the board would like more information and guidance from the legislature ... [about] the transportation of the human remains after composting was to be completed.</p>	<p>The board is unclear about whether soil from NOR should be properly classified as “remains.”</p>	<p>The bill would allow the board to regulate on this subject. The board would have latitude to determine best practices through research and consultation with other state regulators.</p>

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<p>Maryland Department of the Environment... The consultation between them, us</p>	<p>Is there adequate research and proof that NOR is safe from an environmental perspective.</p> <p><u>Note:</u> This is the only issue actually included in the letter of concern.</p>	<p><i>Is it safe? Yes.</i> The process kills bacteria and viruses, including COVID-19. Farmers have used mortality composting for many decades to safely dispose of deceased livestock and control odor.</p> <p><i>Has it been tested and validated scientifically? Yes.</i> Research at Western Carolina University and Washington State University (WSU) has demonstrated the viability of NOR as a natural method of disposition for humans, and WSU’s Soil Science Department conducted a pilot study which proved the safety and efficacy of the process. Long before it was ever applied to human bodies, farmers also safely used mortality composting and universities have tested it exhaustively.</p> <p>It's also important to remember how cadaveric caloricity comes into play. The NOR process uses large vessels to hold human remains which are combined with straw, wood chips, and other natural materials. The decomposing process creates heat of over 131F, which kills viruses, bacteria, and pathogens... The resulting soil is safe for gardens, trees and scattering.</p> <p><u>In Addition:</u> Consider the Washington State model that requires testing samples ~ 25% of the cases.</p>

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<p>our statutes require us to comply with 7-205, which is a cooperation between us, the Office, cemetery oversight and the Maryland State Board of Morticians when it specifically addresses cremation</p>	<p>As drafted initially, the bill would exclude OCO from the regulatory process. That would disrupt the current shared jurisdiction between OCO and BOMFD.</p>	<p>This comment is moot because the amendments include OCO and follow the existing jurisdictional boundaries.</p>
<p>The board looked at the legislation like to know more about the legislatures intent and how to carry out their request specific regulations that you know would be imparted by the by the board</p>	<p>The board questions whether it is up to the task of exercising the broad scope of authority to regulate in this new subject matter that’s granted under the bill.</p>	<p>As is the case with other regulatory changes, the new law will require the board and its staff to learn some new things. Generally, these sorts of changes are accomplished through research, knowledge sharing with other states and training with industry groups. NOR has blossomed into accepted funerary practice – it’s even featured this year by the National Association Funeral Directors (NFDA) as part of its “Virtual Cremation Success Seminar.” Right now, you can find state inspector checklists for NOR facilities on the internet. The changes required to implement HB 1060 are not Herculean. That’s why – as indicated in its comment letter – OCO says it can handle regulating the new disposition process at its existing resource level.</p>

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<p>We'd also like to see you know a more clearer understanding and definitions between the cremation versus the reduction of human remains, the soil through natural organic production</p>	<p>The board does not understand the difference between fire cremation and NOR.</p>	<p>NOR gently transforms human remains into soil in 4-6 weeks. The process uses large vessels to hold human remains which are combined with straw, wood chips, and other natural materials. The decomposing process creates heat of over 131F, which kills viruses, bacteria, and pathogens, and exceeds EPA requirements for heavy metals, which are stabilized in the soil, not volatilized. The resulting soil is safe for gardens, trees and scattering.</p>
<p>and we'd like to see a more reasonable timetable</p>	<p>The board would prefer to defer implementation.</p>	<p>Why should Maryland fall behind other states? NOR has grown out from theoretical seeds of urban planning and applied science that were planted and published more than a decade ago. The concept was fertilized with research studies carried out over the past ten years. Since 2019, NOR has blossomed into accepted funerary practice – it's even featured this year by the National Association Funeral Directors (NFDA) as part of its "Virtual Cremation Success Seminar." Seven other states have adopted laws authorizing NOR because the modest change involved just gives families and funeral businesses one more choice - at the same time, eliminating the carbon emissions for families who opt in.</p>

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<p>From the legislature, which then puts us into the other concern, which would be since House Bill 869 examines the examines environmental study. Because of the the fact that there is only six states currently utilizing this or that have created legislation, I should say only a few have been as early as 2019. The board thought it would be in its best interest to have a study period conducted. The next study period would examine the current state and how how they are, how their soils and environment has been affected by utilizing a similar using the reduction of human remains to soil.</p>	<p>NOR should not be authorized until at least two more studies are completed. First, results from the environmental baseline study contemplated under HB 869 should be reviewed before authorizing NOR. Next, in addition, a second study should be completed to evaluate environmental impacts in the six states where NOR has been authorized.</p>	<p><u>From Del. Boyce’s Letter of Support for HB 1060:</u> “You may be aware that I have sponsored a study bill that complements HB 1060; specifically, HB 869 - Department of the Environment - Study on Deathcare and Funeral Practices. Please note that the purpose of my bill is to establish an empirical baseline of the environmental and health impacts associated with various deathcare and funeral practices including natural organic reduction. HB869 is a complement to HB1060 and elevates this topic of discussion.”</p>
<p>And we also want to make sure that there's a fair practice of, you know, stipulations in there that explains, you know, where the where these locations could be used, how they could be used, how they would impart on the particular jurisdictions locally</p>	<p>The board desires to have clarity about the role and authority of local jurisdictions to effectuate the location of any NOR facilities.</p>	<p>Nothing in the bill disrupts local authority. For example, by analogy, the fact that medical practices are regulated and legal does not preclude local jurisdictions from zoning for them. Therefore, NOR facilities meeting state permitting and licensing requirements could only be located where the local zoning allows it.</p>

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<p>So that would be all of the issues and the board would board would like to recommend that in the information piece that the environmental study would be part of that as well.</p>	<p>N/A</p>	<p>N/A</p>
<p>has no position either way as to the... Legislators’ spirit of the bill, we just needed to know how those issues would all be clarified</p>	<p>N/A</p>	<p>N/A</p>
<p><u>Van Emden</u> Why does this fall under cremation? Why is this not even just a separate? Subsection or full under regular burial</p>	<p>Why is the authorization codified utilizing the construct of cremation? Isn’t the process more akin to burial – and shouldn’t the code reflect that association instead?</p>	<p>It’s not really akin to burial because burial involves the final repose and, by contrast, NOR involves a process for working with remains before the final repose – which occurs with placement of the soil.</p> <p>From a drafting perspective, the reason to utilize the cremation construct is because of Maryland’s unique structure that bifurcates the regulatory authority between two agencies. The simplest solution, therefore, is to frame the codification within that existing structure.</p>

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<p>And here this seems to fall under the track Mortuary science, which means that a funeral director would not be able to ... carry this out, and again, seeing that the category of funeral director was specifically created with Jewish and Muslim practitioners in mind who do not embalm</p>	<p>As originally drafted, the practice of NOR would have been limited to licensed morticians. That would indirectly exclude Jewish and Muslim practitioners who operate as Funeral Directors (not Morticians) because embalming is not consistent with their religious beliefs.</p>	<p>This comment is moot because the amendments include funeral directors and retain the existing roles of OCO and BOMFD, respectively.</p>