



# Board of Morticians and Funeral Directors

*Wes Moore, Governor · Aruna Miller, Lt. Governor · Laura Herrera Scott, M.D., M.P.H., Secretary*

*Dr. Mark E. Bailey Board President – Nilsa M. Hairston, Executive Director  
4201 Patterson Avenue, Baltimore MD 21215 Phone: 410-764-4792; Email: mdh.bomfd.maryland.gov*

March 8, 2023

The Honorable Joseline A. Peña-Melnyk  
Chair, House Health and Government Operations Committee  
Room 241, House Office Building  
Annapolis, Maryland 21401

**RE: HB 1060 – Cremations – Natural Organic Reduction – Regulation – Letter of Concern**

Dear Chair Peña-Melnyk and Committee Members:

The Maryland State Board of Morticians and Funeral Directors (the "Board") is submitting this Letter of Concern for SB 1060 – Cremations – Natural Organic Reduction – Regulation.

While the Board does not have a position on whether Natural Organic Reduction is under its jurisdiction for licensing and disciplinary purposes, the Board has concerns regarding the bill.

The bill defines "Natural Organic Reduction" as a type of cremation rather than a separate practice. The Board is concerned that such a definition may create confusion among both practitioners and members of the public.

The Board is concerned that in order to write regulations that ensure public safety, the Board requires access to data on the impact of Natural Organic Reduction. While the Board is aware of Natural Organic Reduction as a practice, it is relatively new in the United States, which limits the amount of data available. Other governmental agencies such as the Maryland Department of the Environment are better positioned to collect and interpret data in a way that allows the Board to write regulations ensuring public safety, specifically regarding safe disposal of any waste Natural Organic Reduction creates. HB 1060 does not include the Maryland Department of the Environment in the regulatory process and the Board has no authority to order the Maryland Department of the Environment to collect or interpret data. Requiring the Board to write regulations to ensure public safety without any data on the environmental impact of Natural Organic Reduction places the Board in the position of writing regulations with incomplete information.

For these reasons, the Maryland State Board of Morticians and Funeral Directors respectfully urge an unfavorable report on HB 1060. If you would like to discuss this further, please contact me at [markbaileybom@gmail.com](mailto:markbaileybom@gmail.com) or call (443) 790-0005.

Sincerely,



Dr. Mark E. Bailey  
Board President

*The opinion of the Board expressed in this document do not necessarily reflect that of the Department of Health or the Administration.*