

Dear CMA,

Thank you for all of your dedicated work throughout the process of your investigation. I am writing to you on behalf of the [Funeral Celebrancy Council](#) with our response to the Draft Order, on the specific issue of funeral celebrant fees.

[The Funeral Celebrancy Council](#) has been aware for some time now of the oftentime opaque nature of how celebrants are chosen for clients, and how celebrant fees are both decided, and paid. We are therefore concerned that the choice to include celebrant fees in the Standardised FD Price List under: 'Additional Funeral Director Products and Services' misleads the client, giving the impression that both celebrant selection and celebrant fees are controlled by the FD. In view of the fact that celebrants are self-employed, can be engaged directly by the client, and can charge what they like (to fix fees potentially contravenes Competition Law) we would suggest removing the line 'Funeral officiant (minister, celebrant etc)..' and instead create a new section completely.

This could be titled 'Funeral Officiant / Celebrant / Minister' and an explanatory note should introduce this section, explaining: 'You may wish to engage an officiant, celebrant or minister to lead your funeral ceremony. Many are self-employed, and fees vary according to scope of work and location. It is important you choose someone you feel comfortable with. You can pay them directly, or if you wish, the funeral director can both recommend and engage them on your behalf. If they do this, fees will be treated as a third party 'disbursement', which will be passed on to you as part of the final FD invoice.'

Best wishes,

Isabel Russo

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Isabel Russo

Director The Good Funeral Guide CIC

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