

Dear CMA team,

My team and I have had a chance to go through the draft order published in April this year. 99% of it seems to be a good response to the funerals market situation. However there is one line which has the potential to cause huge damage to one part of the funeral industry.

On page 20 in the section "Additional Funeral Director Products And Services" there is the line "Funeral officiant (minister, celebrant etc.)" with the expectation that there should be a fixed price for this line.

Funeral celebrancy in the UK is a hugely distorted market in itself. In general the Church of England publishes a fixed price of approximately £200 for a priest to turn up and deliver a standard funeral ceremony. Essentially the £200 covers half an hour of preparation, travel to the venue, half an hour of delivery, and travel home. Most funeral directors tell families that a priest, Humanist celebrant (a celebrant who is a member of Humanists UK and adheres to their belief system), or an independent celebrant (a celebrant with no specific belief basis for their offering) all cost the same as the CoE charges. Independent celebrants spend between 5 and 20 hours preparing a bespoke funeral ceremony for the family and so setting a fixed price continues to distort the market. Families should be allowed to select a celebrant based on their desires, needs and budget.

An independent, or professional, celebrant does not work for the funeral director, they are an independent service provider acting on behalf of the next of kin and delivering a ceremony according to their requirements. This ceremony is the most visible and memorable part of the entire funeral process. Just as an individual may choose to spend a little or a lot on flowers, a coffin, or a printed order of service surely they should have that same choice with the person writing and delivering the ceremony?

On behalf of the UK members of the International College of Professional Celebrants I ask you to change this line to "Price on request" or similar to show that the celebrant is an external service provider. An alternative would be to list "Funeral officiant (minister of religion)" as a fixed price and "Funeral officiant (independent celebrant)" as Price on request.

Please feel free to contact me if you have any questions.

**Stuart L Morris • Director**  
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**Website:** [www.internationalcollegeofprofessionalcelebrants.org](http://www.internationalcollegeofprofessionalcelebrants.org)