

Submission to the CMA Consultation on Draft Price Transparency Guidance

September 2025

Introduction

The Society of London Theatre (SOLT) and UK Theatre welcome the CMA's draft guidance on price transparency under the Digital Markets, Competition and Consumers Act 2024. We strongly support the principle that consumers should have access to clear, accurate, and timely information about ticket prices, including mandatory fees, to build trust and enable informed purchasing decisions.

Our members include nearly 500 theatres, producers, and performing arts organisations across the UK. Collectively, they welcome over 37 million theatregoers annually, generate billions in economic activity, and sustain thousands of jobs across the creative economy. Clear communication with audiences is therefore central to maintaining consumer confidence and ensuring continued participation in live theatre.

General Comments

We support the CMA's focus on tackling misleading practices such as "drip pricing" and unnecessary partitioned pricing. In the theatre sector, transparent pricing is critical not only for consumer trust but also for supporting sustainable venues and productions in an environment of rising costs.

That said, we believe the guidance needs to be clearer on how it applies to per-transaction charges (sometimes called booking or administration fees) as distinct from per-ticket charges.

Responses to Consultation Questions

Q1 – Structure and clarity

The Draft Guidance is generally clear and accessible. The expanded use of examples is welcome, as this helps venues and ticket agents interpret compliance obligations in practical terms.

Q3 – What must be included in an invitation to purchase

We agree that per-ticket fees should always be included in the advertised price of each ticket. This provides consistency, avoids confusion, and ensures compliance with the principle of total price transparency.

Q4 & Q5a – Per-transaction charges

We echo the concerns set out in the Society of Ticket Agents and Retailers' (STAR) submission:

- **Transparency vs accuracy:** Including a per-transaction fee in the advertised price of each ticket can mislead consumers, as the final payable amount will depend on how many tickets are purchased. For example, advertising a ticket at £22.50 “including a £2.50 fee” could lead a customer buying 10 tickets to wrongly calculate a total of £225, rather than the correct £202.50.
- **Consumer clarity:** It is clearer to state ticket prices (inclusive of per-ticket fees) alongside an adjacent, clearly displayed per-transaction fee. This mirrors the approach permitted for delivery charges in other examples within the Draft Guidance.
- **Practical considerations:** Many ticketing systems set ticket prices via third-party suppliers, with per-transaction fees applied separately at the point of sale. Requiring these fees to be baked into each ticket price would impose significant technical and financial burdens – if not impossible - especially on smaller venues.
- **Consistency across channels:** Some consumers are exempt from per-transaction fees (for example, loyalty or membership schemes). These arrangements would be obscured if fees had to be included in every ticket price.

Recommendation: The guidance should explicitly allow per-transaction fees to be displayed adjacent to ticket prices (for example, on the same page or purchase screen), rather than within the per-ticket headline price. This approach provides transparency without misleading consumers.

Q5b-e – Other charges

- **Delivery charges:** We support clarity that digital tickets provided at no extra cost need not list a delivery fee. Where optional delivery methods (e.g. posted tickets)

incur additional charges, these should be presented transparently at the point of choice.

- **Local charges and taxes:** In theatre, such charges are rare, but we agree it is useful to align with previous CMA guidance to ensure consistency across live entertainment, travel, and hospitality sectors.

Q6 – Illustrative examples

We suggest including ticketing-specific examples within the final guidance to reflect real-world consumer journeys, such as:

- Tickets priced at £50 (inclusive of booking fee), plus a one-off £2.50 per-transaction charge applied at checkout.
- Tickets priced at £25 each, clearly showing that a £3 delivery fee will apply only if the customer opts for posted tickets.

These would help both consumers and businesses understand compliant practice.

Conclusion

SOLT and UK Theatre support the CMA's objectives and endorse much of the Draft Guidance. However, we urge the CMA to clarify its approach to per-transaction charges. These are a longstanding, transparent, and commercially significant element of ticketing, and mandating their inclusion in per-ticket headline prices would create consumer confusion and impose disproportionate technical burdens.

We therefore recommend that the CMA allows per-transaction fees to be displayed alongside per-ticket prices, in line with the treatment of delivery charges.

For further information, please contact:

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About SOLT and UK Theatre

The Society of London Theatre (SOLT) and UK Theatre are the Membership Organisations for Theatre Producers, Managers, Owners and Operators in London and across the UK.

Our Vision, and the world we want to see, is a dynamic, sustainable and world class theatre sector. Our Mission, and what we do as an organisation, is to champion theatre and support our members to thrive.