

Mrs Roslyn J McFarlane

I do not oppose the application of an Annual Registration fee for Marriage Celebrants.

**I DO OPPOSE THE APPLICATION FEE FOR COMMONWEALTH APPOINTED CIVIL CELEBRANTS ONLY.**

The original projection was that the fee would be in the vicinity of \$600.00 per Celebrant Per annum. The fact that it has been set now at \$240.00 matters little. The fact that it applies only to Commonwealth Appointed Celebrants is my concern and complaint.

I wish to express my dissatisfaction at the imposition of an annual Professional Fee being applied only to Commonwealth Registered Civil Celebrants.

Religious Celebrants have their income subsidised whether they conduct marriages or not.

Civil Celebrants will have to increase their fees to cover the cost of the Registration fee, this may then make the couple choose a cheaper option of a Religious Ceremony.

As it is the Religious Celebrant does not have to comply with the annual OPD requirement, the 5 year review; They do not have to meet the Celebrants Code of Conduct particularly in relation to the Complaints Resolution process. They do not have to maintain an office and equipment or run a car solely for their weddings. They do not have to have the advertising expenses as Commonwealth appointed Celebrants do.

This in itself is already discriminatory. DO NOT ADD TO THIS DISCRIMINATION

A State appointed Marriage Celebrant has a full time job. They are not subjected to the some conditions of employment as we Commonwealth appointed Celebrants are. They do not have to undertake OPD, they are not subject to the review . They do not have the personal financial outlay to conduct those ceremonies. They are in direct financial competition with us simply because they can offer Marriage Ceremonies at a lower cost than is feasible for a Self employed Commonwealth appointed Celebrant. This is a contradiction to the right to fair trade.

The argument is made that because MCS does not monitor the performance of Religious Celebrants and State Registered Celebrants then they should not be charged the fee.. WHY are they separate?

They are solemnising Marriages under the umbrella of the Commonwealth of Australia. Couples getting married by these providers must still meet the legal requirements. There are areas for error and mis-conduct in any area.. so WHY ARE ONLY CIVIL CELEBRANTS BEING SCRUTINISED.?

Why are we paying a fee to be told by MCS to seek our own legal opinion to a question that is outside the norm?

Why are we paying a fee to maintain a list of Celebrants that exists on the A/G website already?

How would the department effectively assess the performance of a Celebrant? How would the imposition of this fee make a Celebrant more Professional. Simply presenting an OPD proof, and the Record of Certificate numbers in no way assesses the competence of a Celebrant. The way a Celebrant is assessed is by contacting their clients and seeking verification that the ceremony was satisfactory. If the paperwork is incorrect, it is the Sate BDM who follows up on that , not MCS. In cases of error, let the user pay. Ie impose a fee for each breach.

All of this still only refers to Heterosexual marriage. It is time that the discrimination was removed from all areas, and people who wish to be legally joined to a person of the same sex had that same common law right.

The option for a celebrant to claim exemption to the fee based on their remote location could also be considered discriminatory. Do they do less ceremonies because there are less couples marrying and only have to compete with one or 2 other Celebrants. How does that compare to a Celebrant in a City area who has to compete with often 10 or more celebrants in their immediate location.? A fairer way would be to have a celebrant pay retrospectively , if they exceeded the minimum number of weddings PA. eg 5. Since the national average is at about 8 ceremonies per Celebrant per year.

If that were the case their fee for service would only have to be increased by about \$50.00 which is possibly more manageable and acceptable to the clients.

The department is severely out of touch of they believe that most Celebrants charge more than \$600.00 per ceremony. Most Celebrants cannot charge more than \$500.00. Sorry, they can charge what they want , but they do not get the work. Some charge less, and that may be why the standard of Marriage Ceremonies is below the preferred standard of MCS. In Victoria it is possible to have a Marriage Ceremony for \$350.00 which is lower than the nearest competitor BDM who is not being required to pay the professional fee.

Please make sure that if this fee is to go ahead that it is Fair and equitable

for ALL Marriage Celebrants