Stage 2 Cost Recovery Impact Statement

Births, Deaths, Marriages, and Relationships Services and Products Fees Review 2025/2026

Agency Disclosure Statement

This Cost Recovery Impact Statement (CRIS) has been prepared by the Department of Internal Affairs (the Department). The CRIS provides an analysis of fee options that seek to enable the ongoing cost recovery of providing births, deaths, marriages, and relationships (BDM) services and products. It also provides an analysis of fee options for the fee paid to celebrants for conducting wedding and civil union registry ceremonies on behalf of the Department.

The scope of the fees review is limited to updating existing BDM fees only.

The CRIS discusses the pricing model used by the Department to inform fees reviews. Fees reviews have previously been completed every 3 years and will continue to occur every 3 years. The expenses and revenue forecasts are informed by a range of contributing factors and are modelled until 30 June 2033. In forecasting, the pricing model considers:

- The range of BDM products provided and the fees for those services
- Information on the steps required to provide these services and the cost of those actions
- The fixed and variable costs the Department expects to incur over the forecasting period
- Treasury forecasts of changes in the Consumer Price Index and wage growth
- Forecast demand for each product or service

The pricing model forecasts were used to determine options that will achieve the fees review objectives. The Department acknowledges that the forecast is unable to account for unknown savings or costs not yet identified.

The analysis in this CRIS draws on the cost recovery principles and guidance from the Treasury and the Office of the Auditor-General. Analysis is constrained by having no formal consultation process to inform it; however, a submission was received from Celebrants Aotearoa – Celebrants Association of New Zealand, which informed the analysis of relevant registry ceremony fee options.

The Department is progressing three options for fees increases relating to services and products provided for in the Births, Deaths, Marriages and Relationships Registration (Fees) Regulations 1955, the Civil Union (Prescribed Information, Fees, and Forms) Regulations 2005, and the Marriage (Fees) Regulations 1995. These options are:

- A single fees increase of 14.7% from 2026 (preferred option)
- A two-stage fees increase of 7.7% in 2026 with a further fees increase of 7.7% in 2027

- A three-stage fees increase, with 5.6% fees increases in each 2026, 2027, and 2028

The Minister of Internal Affairs' preferred option for this proposal is consistent with that of the Department.

The Department is also progressing three options for an increase of the fee paid directly to celebrants for solemnising a marriage or civil union (commonly referred to as a "registry wedding/civil union ceremony"). These options are:

- An increase of the fee paid to celebrants for registry ceremonies from $90 to $250
- An increase of the fee paid to celebrants for registry ceremonies from $90 to $175
- An increase of the fee paid to celebrants for registry ceremonies from $90 to $235

In assessing these options, the Department set the objectives of ensuring fair payment to a celebrant providing a registry ceremony, and of ensuring that the fee remains comparatively low-cost. The Department notes that the intention of having the fee for registry ceremonies regulated by government is to ensure that a lower cost option is retained for couples seeking a marriage or civil union ceremony. For that reason, the objective to ensure that the fee remains comparatively low-cost has been weighted higher than the objective of fair payment for the service.

The Department's analysis finds that the two highest ranked options (increase to $175 or increase to $235) have an overall equal scoring against the objectives, and on that basis the Department has no preferred option.

The Minister's preferred option for this proposal is to increase the fee paid to celebrants for registry ceremonies to $175, prioritising the objective of providing a comparatively low-cost ceremony option.

Agreement from Cabinet on the final proposal for updated fees will permit the drafting of amended fees regulations by the Parliamentary Counsel Office (PCO) and the Department. The Cabinet Legislation Committee will then be asked to approve the amended regulations, subject to consideration by the Executive Council and the Governor General.

This CRIS will be published on the Department's website.

Gillian Ferguson, General Manager Policy

9(2)(a)

19/02/2026

Department of Internal Affairs Quality Assurance Panel Statement

The Department's Regulatory Impact Analysis panel (the panel) has reviewed the Births, Deaths, and Marriage (BDM) Services and Products Fees Review 2025: Stage 2 Cost Recovery Impact Statement (CRIS) in accordance with the quality assurance criteria set out by the Ministry for Regulation.

The panel members for this review were:

- 9(2)(a) [redacted], Principal Policy Analyst (Chair)
- 9(2)(a) [redacted] Senior Policy Analyst (Member)
- 9(2)(a) [redacted], Senior Policy Analyst (Member)
- 9(2)(a) [redacted], Policy Analyst (Secretariat)
- 9(2)(a) [redacted], Principal Policy Analyst (Shadow Chair)

The panel considers that the information and analysis contained in the CRIS **partially meets** the quality assurance criteria.

This CRIS undertakes analysis in two parts: **Part A:** examines options to increase fees for services and products provided for in the BDMR Regulations, Marriage Regulations and Civil Union Regulations (aside from the prescribed fee paid for registry ceremonies to celebrants). **Part B:** examines options to increase the fee paid directly to celebrants for solemnising a marriage or civil union in a registry ceremony, incorporated within the fee set out in the Marriage Regulations and the Civil Union Regulations.

The CRIS, **Part A** is reasonably clear and concise, sets out the status quo well and contains the necessary information. The analysis and conclusions reached for the fees increase for BDMs is supported by an appropriate framework and evidence. There has been consultation with relevant agencies, but no public consultation. The CRIS acknowledges that the analysis is constrained by having no formal public consultation to inform the proposed fees increases. The inclusion of feedback from the last fees increase (in 2017) provides useful insights in support of fees increases, however, this review was some time ago and may not be representative of public views of the current proposals for fee increases. Consultation on the problem definition and range of options is an important part of the impact analysis process and is one of the key quality assurance criteria. The 'consulted' criteria is therefore only partially met.

The CRIS, revised **Part B,** relies substantially on the Celebrants Association of New Zealand (Celebrants Aotearoa) submission, as a single source of evidence. There are challenges in assessing what is an appropriate rate in the absence of alternative evidence and without public consultation. The CRIS acknowledges that there is an inherent tension between the Part B principles/objectives, of equity and affordability, and resulting trade-offs. The 'convincing' and 'consulted' criteria is therefore only partially met.

9(2)(a) [redacted]

9(2)(a) [redacted]

Chair of the Department of Internal Affairs' CRIS panel

18 / 02 / 2026

Executive summary

The Department of Internal Affairs (the Department) provides a range of births, deaths, marriages, and relationships (BDM) services and products under the Births, Deaths, Marriages, and Relationships Registration Act 2021 (the BDMR Act), the Marriage Act 1955 (the Marriage Act) and the Civil Union Act 2004 (the Civil Union Act). The majority of the cost of providing these services and products is funded through the BDM and Other Products Memorandum Account (the Memorandum Account), with the fees which individuals pay for these services and products being the source of revenue.[1]

The fees for these services and products are prescribed in the Births, Deaths, Marriages and Relationships Registration (Fees) Regulations 1995 (BDMR Regulations), the Marriage (Fees) Regulations 1995 (Marriage Regulations), and the Civil Union (Prescribed Information, Fees and Forms) Regulations 2005 (Civil Union Regulations).

Review of fees for BDM services and products

In accordance with best practice fees recovery guidelines from the Treasury and the Office of the Auditor-General, fees for BDM services and products are reviewed by the Department every three years. The current fees review began in late 2023/2024 and has found that the cost of providing BDM services and products has increased and that the cost is no longer met by the revenue from current fees. It also found that the Memorandum Account is now showing a deficit of ($0.844 million) as of 30 June 2025. Therefore, the Department is undertaking the present fees review to assess options for increasing the fees paid for BDM services and products. There are no legislative or regulatory constraints on charging fees for BDM services and products.

The objectives set by the Department for this fees review are to return the Memorandum Account balance to near zero by 30 June 2033, and to consider the cost recovery charges in line with the principles of sustainability, equity, justifiability, and efficiency.

Options for increasing fees were based on these objectives and informed by the Department's forecast until 2033 for the Memorandum Account. This was developed using the Department's pricing model.

Four options (including the status quo option of no fees increase) have been assessed against the objectives and are being progressed for Cabinet consideration. These options are:

- **Option One**: no fees increase.
- **Option Two**: a single fees increase of 14.7% from 2026.
- **Option Three**: a two-stage fees increase of 7.7% in 2026 with a further fees increase of 7.7% in 2027.
- **Option Four**: a three-stage fees increase with a 5.6% fee increase in 2026, 2027, and 2028.

[1] A small component (related to the provision of birth and death registration services) is funded from Crown appropriations in recognition of the public good this service provides. For example, the cost of registering a birth is Crown funded, while the provision of a birth certificate is funded from the Memorandum Account and recovered by fees.

The Minister of Internal Affairs (the Minister) has indicated an initial preference for Option Two above, which aligns with the Department's recommended option as assessed in this Cost Recovery Impact Statement. Option Two scores best against all fees review objectives in comparison to all other options.

Review of fees paid to celebrants for marriage and civil union registry ceremonies

Additionally, Celebrants Aotearoa (Celebrants Association of New Zealand/CANZ) submitted to the Department and the Ministry of Justice (MoJ) requesting an increase to the fee paid directly to celebrants for conducting a registry wedding or civil union ceremony. CANZ submitted that the fee currently paid to celebrants does not adequately cover the costs of providing a registry ceremony and that the fee should be increased. The current fee was set at a time where the Department and the MoJ provided the registry ceremony service, as opposed to the current registry ceremony service being provided by independent celebrants (often in their own homes). Therefore, the Department considers that the submission by CANZ is justified and is reviewing this fee as part of the overall BMD fees review.

The fee for provision of registry ceremonies is paid directly to celebrants. Therefore, the approach taken to assess options to increase the fee paid to celebrants is not a government cost recovery approach. However, as the fee is regulated by the government, it is important to ensure that the fee is appropriate by assessing the fee through a Cost Recovery Impact Statement.

The Department considers that ensuring the fee is equitable and affordable are the objectives guiding this fee review.

Four options (including the status quo option of no fee increase) have been assessed against the objectives. These options are:

- **Option One:** no fee increase.
- **Option Two:** an increase of the fee paid to celebrants for registry ceremonies from $90 to $250 (the increase requested by CANZ).[2]
- **Option Three:** an increase of the fee paid to celebrants for registry ceremonies from $90 to $175.
- **Option Four:** an increase of the fee paid to celebrants for registry ceremonies from $90 to $235.

Option Three and Option Four score best against the two fee review principles and are equally credible options for the decision-maker. The Minister's preferred option is Option Three as it prioritises the principle of ensuring that the fee set is comparatively low-cost.

Implementation and future reviews

The fees in the schedules to the BDMR Regulations, Marriage Regulations, and Civil Union Regulations will need to be amended to give effect to the proposed increases. The Department is confident in implementing the fees increases in the system and managing the announcement of fees increases, to ensure that there are no resourcing issues and

[2] All pricing figures used in this document are inclusive of GST.

processing delays from a spike in application for BDM services and products before the increases take effect.

Fees will next be reviewed in 2028, in accordance with the 3-yearly review cycle. One of the objectives of BDM fees review is to have the Memorandum Account return to a neutral balance by 30 June 2033. The Department acknowledges that a long-term change forecast is subject to change where additional costs or savings arise, or if demand for services changes. Continuing to review fees every 3 years will enable the Department to update forecasts, monitor whether this objective remains on track and seek to make changes to fees accordingly if not.

Overall approach of this Cost Recovery Impact Statement (CRIS)

1. This CRIS assesses options for fees provided for in the Births, Deaths, Marriages and Relationships Registration (Fees) Regulations 1995 (BDMR Regulations) and the fees charged for marriage and civil union ceremonies solemnised by celebrants as provided for in the Marriage (Fees) Regulations 1995 (Marriage Regulations) and the Civil Union (Prescribed Information, Fees and Forms) Regulations 2005 (Civil Union Regulations).
2. This CRIS undertakes analysis in two parts:
    - **Part A:** examines options to increase fees for services and products provided for in the BDMR Regulations, Marriage Regulations and Civil Union Regulations (aside from the prescribed fee paid for registry ceremonies to celebrants).
    - **Part B:** examines options to increase the fee paid directly to celebrants for solemnising a marriage or civil union in a registry ceremony, incorporated within the fee set out in the Marriage Regulations and the Civil Union Regulations.[3]
3. The Department of Internal Affairs (the Department) considers that splitting analysis into two parts is necessary. This is because the fees analysed in Part A operate on a full cost recovery basis and are paid directly into the BDM and Other Products Memorandum Account (the Memorandum Account). Part B analyses the part of the fee for solemnising marriage and civil union ceremonies under the Marriage Regulations and the Civil Union Regulations that is paid directly to the celebrant.
4. We note that the $240 fee for 'every notice of marriage/intended civil union and solemnisation of a marriage/civil union by a registrar' is comprised of the cost of the marriage/civil union licence payable to the Department ($150) and the fee paid directly to celebrants ($90).
5. While the option chosen in Part A will increase the fee examined in Part B, this increase will impact only the segment of the fee payable into the Memorandum Account. Celebrants Aotearoa (Celebrants Association of New Zealand/CANZ) has separately requested an increase of the fee that is paid directly to celebrants. The Department considers that this request is justified.
6. There are different considerations to be accounted for when assessing options for increasing the fee paid to celebrants, and on this basis, a separate analysis process is

[3] This fee is regulated in combination with the fee for the notice of marriage or civil union, and can be found under matter 3 of the Schedule in the Marriage (Fees) Regulations 1995, and matter 2 of Schedule 1 in the Civil Union (Prescribed Information, Fees and Forms) Regulations 2005.

necessary. Therefore, Part B of this CRIS will examine the options for increasing the fee that is paid directly to celebrants.

Part A – options to increase fees for services and products in the BDMR regulations

Status quo

7. The Births, Deaths, Marriages, and Relationships Registration Act 2021 (the BDMR Act), the Marriage Act 1955 (the Marriage Act) and the Civil Union Act 2004 (the Civil Union Act) establish a range of births, deaths, marriages, and relationships (BDM) services and products. BDM services and products provide a source of demographic information for government and act as an official record of births, deaths, marriages, civil unions, and name changes that can be used as evidence by individuals for private needs.

8. The Department provides a wide range of BDM services and products to New Zealanders under the BDMR Act, the Marriage Act,[4] and the Civil Union Act.[5] These services and products, except for birth and death registration,[6] are funded through cost recovery fees. The fees are set out in the BDMR Regulations, the Marriage Regulations, and the Civil Union Regulations. The revenue generated through these fees is paid into the Memorandum Account which manages the expenses incurred in service provision.

9. The fees operate on a full cost recovery basis as the services provided are a private good. Therefore, those who are receiving the sole benefit of these services and products should pay for the full cost associated with providing these.

Reviews of cost recovery charges

10. The current fees for BDM services and products as in the Schedule to the BDMR Regulations, the Marriage Regulations, and Schedule 1 of the Civil Union Regulations are set out in **Table 1** in **Annex A.**[7] Fees are set up based on the costs associated with each service or product. These fees provide the primary revenue for the Memorandum Account which manages and funds the expenses associated with the Department's provision of BDM services and products. The principle of full cost recovery applies to all BDM services and products, aside from birth and death registration (which is Crown funded).

11. Fees for BDM services and products are reviewed every three years by the Department, in line with best practice fee recovery guidelines from the Treasury and the Office of the Auditor-General.

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[4] While the Marriages Act is administered by the Ministry of Justice, section 4(1) of the Marriages Act provides that the Registrar-General of Births, Deaths, and Marriages is charged with the general administration of the Marriage Act.

[5] While the Civil Union Act is administered by the Ministry of Justice, section 34 of the Civil Union Act provides that the Registrar-General is charged with general administration of the Civil Union Act.

[6] Registration of births and deaths are funded directly by the Crown reflecting the mandatory requirement to record these events.

[7] **Annex A** provides a full list of BDM products and services.

Previous fees reviews

12. Fees for BDM services and products were last increased in 2017, due to deficits in the relevant memorandum accounts.[8] After undertaking public consultation, an increase to fees ranging from 0 – 40% was implemented, depending on the service provided.

13. During the last fees review in 2021, the Memorandum Account was found to have a surplus balance of $3.022 million. While it was clear that costs of production for BDM services and products were increasing at this time, it was considered that the surplus balance in the Memorandum Account would be able to absorb the increased costs until the next fees review in 2024, and any work to increase fees could occur then if required.

The 2024 – 2025 fee review

14. The Department began reviewing the BDM services and products fees in late 2023/early 2024. At that time the review revealed that the Memorandum Account was showing a deficit balance of ($0.635 million) as of 30 June 2024.

15. As with previous reviews, initial findings showed that costs for providing BDM services and products have continued to increase and that the fees no longer provide for cost recovery. However, as fees reviews for other identity products (passports and citizenships) were occurring at the same time, the Minister of Internal Affairs (the Minister) directed that consideration of options for increasing BDM fees should be deferred until after fees increases across the other identity products were implemented. On this basis, the BDM fees review began to progress again only in mid – 2025.

16. **Table 1** below sets out revenue and expenses over the previous eight financial years, since fees were last increased.

Table 1: BDM Certifications and Other Products Memorandum Account[9]

($'m)	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
Opening balance	($1.946)	$1.001	$2.119	$1.568	$3.022	($0.292)	($0.501)	($0.635)
Revenue	$15.176	$15.274	$13.755	$13.953	$13.864	$15.332	$15.100	$15.517
Expenses	($12.229)	($14.156)	($14.306)	($12.499)	($17.178)	($15.541)	($15.234)	($15.726)
Closing balance	$1.001	$2.119	$1.568	$3.022	($0.292)	($0.501)	($0.635)	($0.844)

17. As of 30 June 2025, the balance of the Memorandum Account shows a deficit of ($0.844 million). The increases in the deficits as shown above are solely attributable to the increase in production expenses resulting from increases in the cost of living since fees were last adjusted in 2017. Since 2017, the Consumer Price Index (CPI) has increased by 31.9% (including an increase of 20.7% from 2021 to 2025). These cost-of-living

[8] Prior to 2022, there were separate Memorandum Accounts for BDM services and products, and for Marriage and Civil Union services and products.

[9] The BDM Memorandum Account was merged with the Marriage and Civil Union Memorandum Account in 2022/23. Table 1 shows financials for the merged accounts over all years.

increases are higher than anticipated during the 2017 fees review and have impacted direct and indirect costs of service delivery, including the cost of maintaining and developing the technological system necessary to deliver BDM services and products.

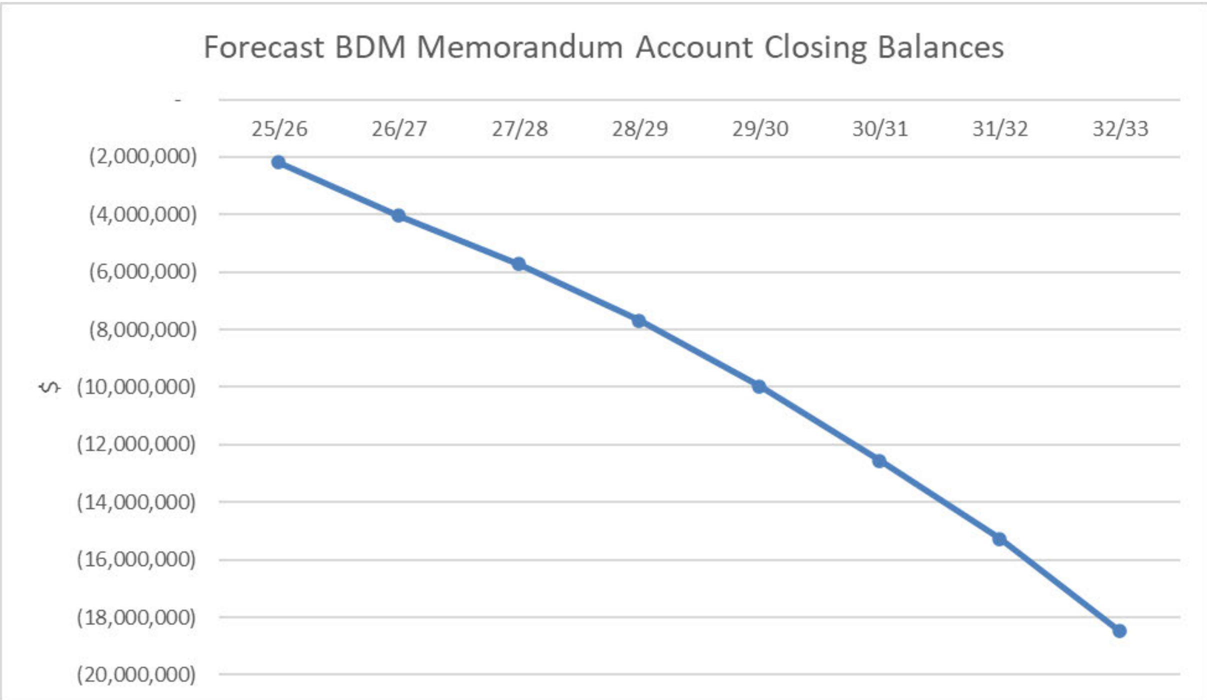
18. Current fees for BDM services and products are no longer meeting the costs of providing these services and products.

Problem with the status quo

19. Current fees for BDM services and products are no longer covering the full costs of providing these services and products. Now that the Memorandum Account is in deficit, there is no surplus balance to absorb the impact of the cost increases that have occurred over time. Additionally, the BDM Memorandum Account is not subject to significant increases or decreases in demand for services and products. Demand varies little from year to year, meaning that short-term deficits cannot be offset from future increases in demand driven revenue.

20. As **Figure 1** below shows, the Department has forecasted that without intervention, the deficit balance of the Memorandum Account will increase to ($18.476 million) by 30 June 2033. The Department will support short term deficits from its balance sheet until the Memorandum Account returns to full cost recovery. The expectation from the Treasury guidelines is that deficits from Memorandum Accounts are met from the agency's balance sheet.

Figure 1: Forecast BDM Memorandum Account Closing Balances (no intervention)



Cost Recovery Principles and Objectives

Principles

21. The principles underpinning fees for BDM services and products are informed by the Treasury and OAG fee guidelines. The fees should be:

- **Sustainable:** fees must support the ongoing financial sustainability of BDM services and products;
- **Equitable:** each person who benefits from a BDM service and/or product should meet the full cost of providing the service/product to them;
- **Justifiable:** fees set for BDM services and products should reasonably reflect the cost of providing the BDM service or product; and
- **Efficient:** the fee should closely reflect the costs incurred to produce BDM services and products to the required quality.

Objectives

22. The Department has set the following objectives for this fees review to enable the proposed options to be assessed for consistency with the BDM fees principles above.

Objective #1 - to assess the principle of sustainability: *fiscal sustainability*

23. The following objective has been set:
    - **Fiscal sustainability:** return the Memorandum Account balance to near zero by 30 June 2033.
24. As noted above, the Memorandum Account is showing a deficit of ($0.844 million) as of 30 June 2025 with increasing deficits in out-years. The expectation from the Treasury and AOG guidelines is for the balance of the Memorandum Account to trend towards zero over a reasonable period, and for deficits to be managed within a reasonable budgeting framework.
25. The Department considers it is reasonable to manage and recover this deficit over a 7-year period through fees.[10] This period has been chosen primarily as it represents a middle ground. If too short of a period is chosen, this can place an unfair burden on those who seek a BDM service or product as it may be significantly overpriced to recover the deficit over less time. Furthermore, in the past, where the Department has sought to recover over a shorter time-period (i.e. five years), this has resulted in an over-recovery of costs. However, if a period of more substantial length is chosen (i.e. ten years), the accuracy of forecasts for costs is more uncertain. The correct costs may not be assumed because the external environment is constantly changing.
26. Therefore, a middle-ground of 7-years to recover the deficit is considered reasonable, especially as BDM services and products have a generally consistent volume profile (demand does not tend to substantially fluctuate over time). A longer recovery period (as opposed to five years) also means the cost of recovering the deficit can be spread between more users, reducing the impact on each individual user.
27. Recovering the deficit and returning to full cost recovery would illustrate that fees are supporting the ongoing financial sustainability of BDM services and products (in line with the sustainability principle).

Objective #2 – to assess the principle of equitability: *equitable fees*

[10] In the past, where the Department has sought to recover a deficit over a shorter time-period, this has resulted in an over-recovery of costs. A 7-year recovery period is proposed to reduce the risk of over-recovery.

28. The following objective has been set:

- **Equitable fees:** ensure that each person receiving the benefit of a BDM service or product pays the full cost of providing the service/product to them.

29. As noted above, full cost recovery is considered appropriate as the BDM services and products being provided are a private good and not a legal obligation. Therefore, it is equitable that those who receive the sole benefit of these services and products should pay the full cost associated with providing these. This includes the costs of maintaining the capability and capacity of providing these services and products.

Objective #3 – to assess the principle of justifiability: *justifiable fees*

30. The following objective has been set:

- **Justifiable fees:** the price for BDM services and products should only reflect the cost of providing the related BDM service or product.

31. In line with AOG guidelines, fees should only recover for those costs that can reasonably be attributed to producing the services and products that the fee applies to. Therefore, the fees set for BDM services and products should meet actual costs for providing these services and products, based on reasonable assumptions for what these costs will be in the future. This objective further aligns with the Treasury and AOG guidelines which indicate that fees should not provide for over-recovery into the Memorandum Account, seeking to minimise cross-subsidisation, and will ensure that costs for accessing a BDM service or product are reasonably priced so that fees do not act as a barrier for people to access these services and products.

Objective #4 – to assess the principle of efficiency: *efficient fees*

32. The following objective has been set:

- **Efficient fees:** the price for BDM services and products should be no higher than necessary to provide the service/product to the required high quality.

33. In line with AOG guidelines, fees should be structured in a way that ensures the Department can provide as many BDM services and products as required to the desired level of quality with a fee that is no higher than necessary. Therefore, if a fee is set higher than required to provide the BDM service or product, the fee would be inefficient.

Weighting of objectives

34. The Department considers that the objective of fiscal sustainability should be weighted more heavily than the other objectives. The expectation from the Treasury is that the balance of a Memorandum Account should trend towards zero over a reasonable period. Therefore, recovery of the deficit is a necessary objective and as the main revenue for the Memorandum Accounts comes from fees for BDM services and products, the objective of achieving fiscal sustainability is a core component of the options considered in this review.

35. The Department recognises that recovering a deficit is in conflict with the objective of setting justifiable fees (which indicates that fees for BDM services and products should only reflect the cost of providing the related BDM service or product). Recovering the deficit means that fees will need to be set higher than the cost of providing the BDM service or product. The Department considers that managing and recovering the deficit over a 7-year period mitigates this conflict. This is as it spreads the impact of recovering

the deficit over those 7 years. This means the cost of recovering the deficit can be shared between more users, and the costs for each user can be set lower than if the deficit needed to be recovered in a shorter period.

36. Fiscal sustainability is also considered a more critical objective than setting equitable and efficient fees due to the importance of returning the Memorandum Account towards zero. The Department considers that the objectives of equitable, justifiable and efficient fees should all be weighted equally.

37. Overall, the weight of the objectives are as follows: fiscal sustainability **(1.5x),** equitable fees **(1x),** justifiable fees **(1x)**, and efficient fees **(1x)**. While fiscal sustainability is considered the most critical consideration, it only moderately conflicts with the other objectives. Therefore, only a moderate difference in weighting is appropriate.

Policy Rationale: Why a user charge? And what type is most appropriate?

38. A user fee remains appropriate due to BDM services and products being considered a private good. The services and products provide sole benefit to the people that receive them.

39. BDM services and products are not Crown funded, aside from birth and death registration costs, and the Department does not have an operational budget dedicated to fund these services. **Table 2** in **Annex A** provides the volumes of BDM services and products provided from 2020 onwards. As an example, the Department provided 104,807 standard birth certificates, 21,033 notices of marriage, and 48 notices of intended civil union in 2023/2024. The current resident population of New Zealand as of 30 June 2025 by Stats NZ was 5,324,700, meaning that only a small proportion of the New Zealand population uses these services each year.

40. Crown or Department funding would result in the wider public funding a service/product that they are unlikely to ever receive benefit from. It is most equitable that those using and benefitting from BDM services and products pay a user fee that recovers the full cost of providing that service/product.

The level of the proposed fee and its cost components (cost recovery model)

41. As noted, the cost of providing BDM services and products is no longer able to be covered by revenue from current fees. The Memorandum Account is in deficit and can no longer absorb the extra cost with a surplus balance.

The pricing model

42. The Department uses a pricing model to inform decisions on future fees adjustments, determine the fees settings needed to achieve cost recovery, and to recover any unintended deficits. The pricing model involves forecasting both the expenses and revenue the Department expects from BDM services and products over the next 7 years.

The forecast of expenses and revenue over the next 8 years

43. The Department provides a range of different types of BDM services and products, with fees for these services ranging from $1 to $220. The most used type of service is the

issuance of birth certificates which accounts for 38% of the services provided (by volume). Given the lower level of demand and revenue collected from the other 35 services, analysis of the cost pressures can fluctuate greatly. The Department is of the view that the principles used to analyse birth certificate costs and fees should be used to inform the fees for other BDM services and products.[11]

44. Based on this, expenses associated with providing BDM services and products can be organised into the following cost categories:

- **Fixed costs:** goods and services tax.
- **Semi variable costs:** accommodation, central ICT, telecommunications, core production systems, other operating costs, and central support costs.
- **Total direct costs:** direct resourcing, identity support, branch enabling services, and certificate paper.
- **Strategic development costs:** project costs.

45. The total estimated costs of these expenses over time, along with forecasted CPI increases and wage growth as estimated by the Treasury, were used to inform the forecast of expenses until 2033 as set out in **Table 2** below.[12]

- **Direct expenses**: front line service delivery staff, related management costs, and directly attributable inventory costs such as for certificate paper.
- **Indirect expenses**: supporting related business units (e.g. Investigations, Business Capability and Change, Data and Technical Capabilities, and Forecasting and Planning), contact centre costs, and IT operational support costs for information technology systems.
- **Overheads**: include accommodation costs for the Department's physical office locations, central core and common ICT costs (e.g. software licenses, electronic document storage infrastructure), costs to deliver ICT security and other technological support for BDM services and products, and central support costs.
- **Depreciation and Capital Charge**: costs associated with the Department's assets and are fixed in nature. The cost of writing down the value of these assets over their useful lives and a contribution to the cost of capital with regards to funding implementation projects.

46. Forecasted CPI increases and expected wage growth are the major cost drivers across all expenses detailed above.

Table 2: Forecasting of total expenses for BDM and civil union costs

BDM ($)	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33

[11] **Annex A** provides a full list of BDM services and products.

[12] The Department notes that while **Table 2** provides the forecasted increase of costs until 30 June 2033, the expected $18.476 deficit in the Memorandum Account (with no intervention) comprises of these costs as well as the current and compounding deficit in the Memorandum Account caused by fees that do not allow for cost-recovery.

Direct Expenses	3,986,095	4,103,449	4,224,278	4,308,764	4,394,939	4,482,838	4,572,495	4,663,944
Indirect Expenses	6,048,992	6,303,294	5,862,199	5,952,106	6,044,682	6,139,520	6,236,682	6,347,522
Overheads	5,767,256	5,873,950	5,983,205	6,096,288	6,212,727	6,332,012	6,454,219	6,593,630
Depreciation	762,814	768,110	752,191	674,157	645,001	550,877	250,000	250,000
Capital Charge	227,797	261,010	208,074	143,727	92,322	54,892	31,585	30,576
Total Expenses	16,792,953	17,309,812	17,029,948	17,175,042	17,389,672	17,560,138	17,544,981	17,885,673

47. Fees from BDM services and products provide the main revenue of the Memorandum Account. Therefore, the forecast of revenue is based on the forecast demand for each BDM service and product and is based on the expected stability of demand for these services and products.

Unknowns that may affect forecasting

48. As noted earlier, one of the fees review objectives is to recover the deficit and return the Memorandum Account balance to neutral by 30 June 2033. A limitation is that a 7-year forecast may be subject to change, as demand and expenses have the potential to fluctuate and be impacted by (often unforeseen) future events.

49. There may also be unidentified future savings in the medium term that are not included in the 7-year forecast arising from the use of artificial intelligence technology. These may be used to respond to customer queries which could enable a reduction in call centre staffing. Additional savings may also arise in the long term from the development and implementation of a new civil registration system which could allow for more efficiencies, new services, and increasingly digital certificates. It is not yet possible to identify what the savings may be from these medium to long-term projects.

50. Any risks from these unknowns in long-term forecasting will be mitigated through monitoring via future 3-yearly fee reviews. New demand forecasts and budgets will be produced and can factor in any changes. This will monitor whether the objective to recover the deficit by 30 June 2033 is still on track, or whether intervention is needed.

Proposed fees options

51. The pricing model was used to develop feasible options to meet the objectives of the fees review. The option of no fees increases is also assessed. Fees increases would be applicable to all fees in the BDM Regulations. The options to be assessed in this CRIS are:

- **Option One:** No fees increase.
- **Option Two:** A single fees increase of 14.7% from 2026. This option would increase the cost of a:

- standard birth certification from $33 to $38;
- decorative birth certificate from $35 to $40; and a
- notice of intended marriage from $150 to $172.

- **Option Three:** A two-stage fees increase of 7.7% in 2026 with a further fees increase of 7.7% in 2027. This option would increase the cost of a:
  - standard birth certificate from $33 to $36 in 2026, and to $38 in 2027;
  - decorative birth certificate from $35 to $38 in 2026, and to $41 in 2027; and a
  - notice of intended marriage from $150 to $162 in 2026, and to $174 in 2027.
- **Option Four:** A three-stage fees increase, with 5.6% fees increases in each 2026, 2027, and 2028. This option would increase the cost of a:
  - standard birth certificate from $33 to $35 in 2026, to $37 in 2027, and to $39 in 2028;
  - decorative birth certificate from $35 to $37 in 2026, to $39 in 2027, and to $41 in 2028; and a
  - notice of intended marriage from $150 to $158 in 2026, to $167 in 2027, and to $177 in 2028.

52. **Table 1** in **Annex A** contains further detail of the fees increases that would occur across all BDM services and products currently provided by the Department. All options propose a flat increase across all fees.

53. For all options, the Department will support short term deficits from its balance sheet until the Memorandum Account returns to a neutral position.

Options not proposed

- An option to increase different service fees by different percentages has not been proposed. This fees review assumes that cost increase drivers for providing BDM services and products have increased all fees proportionally, so the relativity of fees to each other has not been changed. This assumption has been made in the absence of any evidence suggesting otherwise.
- Repayable capital injections to support the Memorandum Account until the account deficit is addressed has also not been proposed as an option, as the Department is able to temporarily support the Memorandum Account deficits from its balance sheet.

International comparison

54. **Table 3** below shows an international fees comparison for BDM certificates and notices of marriage between New Zealand, Australia, Canada, the United Kingdom, and the United States.[13] The Department generally compares costs, fees, and pricing with these

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[13] Thees are prices as of 7 October 2024. All prices, except New Zealand's, exclude countries' value-added taxes. Foreign exchange values are rounded to the nearest whole dollar. Exchange rate as of 7 October

countries across all services and products. However, it is noted that comparing fees between countries is challenging due to countries' differing production economies of scale.

55. Prices shown for Option Three and Option Four which take a staged approach to fees increases show the final price after each stage of the fees increase has occurred. All prices are shown in New Zealand dollars.

Table 3: International comparison for BDM certificates and notices of marriage/civil union

	New Zealand (incl. GST)				Australia	Canada	United States	United Kingdom
Option	**One**	**Two**	**Three**	**Four**				
BDM Certificates	$33	$38	$38	$39	$63	$18 - $53	$16 – $54	$22
Notice of marriage	$150	$172	$174	$177	-	$71 - $189	$48 - $148	$71

56. The current fees in New Zealand and the proposed options are broadly comparable with the fees in other jurisdictions. While the fee for a Notice of marriage is higher this is likely due to the differing production economies of scale with all countries compared having much higher populations than New Zealand which results in much higher demand (and subsequently costs) for BDM services and products.

57. Prices shown for Option Three and Option Four which take a staged approach to fees increases show the final price after each stage of the fees increase has occurred. All prices are shown in New Zealand dollars.

2024 (ANZ Foreign Exchange Calculator). The fees for other jurisdictions are the least expensive option where there is a pricing difference between online and paper applications. Note that costs in Australia, Canada, and the United States vary between states, provinces, and counties.

Impact analysis

58. The four options (including the option of no fees increase) are assessed against the four objectives in **Table 4** below.

Table 4: Part A - Analysis of options against objectives

	Option One – no fees increase	Option Two – single fees increase of 14.7%	Option Three – two-stage fees increase of 7.7% in 2026 and 2027	Option Four – three-stage fees increase of 5.6% in 2026, 2027, and 2028
Fiscal sustainability (weighted 1.5x)	0 The Department has forecast that the deficit of the Memorandum Account will increase to ($18.476 million) by 30 June 2033.	3 (4.5) This option would return the balance to neutral/near neutral by 30 June 2033.	3 (4.5) This option would return the balance to neutral/near neutral by 30 June 2033.	3 (4.5) This option would return the balance to neutral/near neutral by 30 June 2033.
Equitable fees (weighted 1x)	0 The fee paid by those receiving the benefit of the BDM service/product does not cover the full cost of providing the service.	3 The fee paid by those receiving the benefit of the BDM service/product would cover the full cost of providing the service.	2 The fees increase in 2026 would not result in the full cost of providing a BDM service or product being paid by the individual receiving the benefit of that service/product. However, after the fees increase in 2027, individuals would be paying the full cost of providing the BDM service or product that they seek, which makes this better than the status quo.	1 Neither the fees increase in 2026, nor in 2027, would result in the full cost of providing a BDM service or product being paid by the individual receiving the benefit of that service/product. However, after the third fees increase in the 2028, individuals would be paying the full cost of providing the BDM service or product that they seek, which makes this slightly better than the status quo.
Justifiable fees (weighted 1x)	0 The cost of providing the BDM service/product is currently not reflected by the fee charged.	-1 The fee paid by those receiving the benefit of the BDM service/product would exceed the cost of providing the related BDM service/product in order to recover the current deficit. However, compared to the other options, the total increase in the fees is the most minimal and limits additional cross-subsidisation.	-2 The fee paid by those receiving the benefit of the BDM service/product would exceed the cost of providing the BDM service/product in order to recover the current deficit. While this option would lead to a lower initial increase in fees, as compared to Option One, the staged increases will lead to additional cross-subsidisation.	-3 The fee paid by those receiving the benefit of the BDM service/product would exceed the cost of providing the BDM service/product in order to recover the current deficit. While this option would lead to a lower initial increase in fees, as compared to Option One, the staged increases will lead to additional cross-subsidisation and the highest final cost.
Efficient fees **(weighted 1x)**	The current fees for BDM services and products are lower than necessary to provide the service/product.	3 The fee paid by those receiving the benefit of the BDM service/product would immediately cover the full cost of providing the service and begin to address the deficit in the Memorandum Account. This would impact the quality to which the Department can provide BDM services/products in the long term.	2 The fee paid by those receiving the benefit of the BDM service/product would cover the full cost of providing the service and address the deficit in the Memorandum Account. This would impact the quality to which the Department can provide BDM services/products in the long term. However, this would only be after the two-stage increase is completed and would result in an overall higher cost for individuals than under Option One.	1 The fee paid by those receiving the benefit of the BDM service/product would cover the full cost of providing the service and address the deficit in the Memorandum Account. This would impact the quality to which the Department can provide BDM services/products in the long term. However, this would only be after the three-stage increase is completed and would result in an overall higher cost for individuals than under Option One and Option Two.
Overall assessment (out of 13.5)	**0**	**9.5**	**6.5**	**3.5**

Key for scoring in Table 4	
3	Much better than doing nothing/status quo
2	Better than doing nothing/status quo
1	Slightly better than doing nothing/status quo
0	The same as doing nothing/status quo
- 1	Slightly worse than doing nothing/status quo
- 2	Worse than doing nothing/status quo
- 3	Much worse than doing nothing/status quo

Bracketed figures incorporate weighting of objectives

The option of no fees increase does not meet the objectives

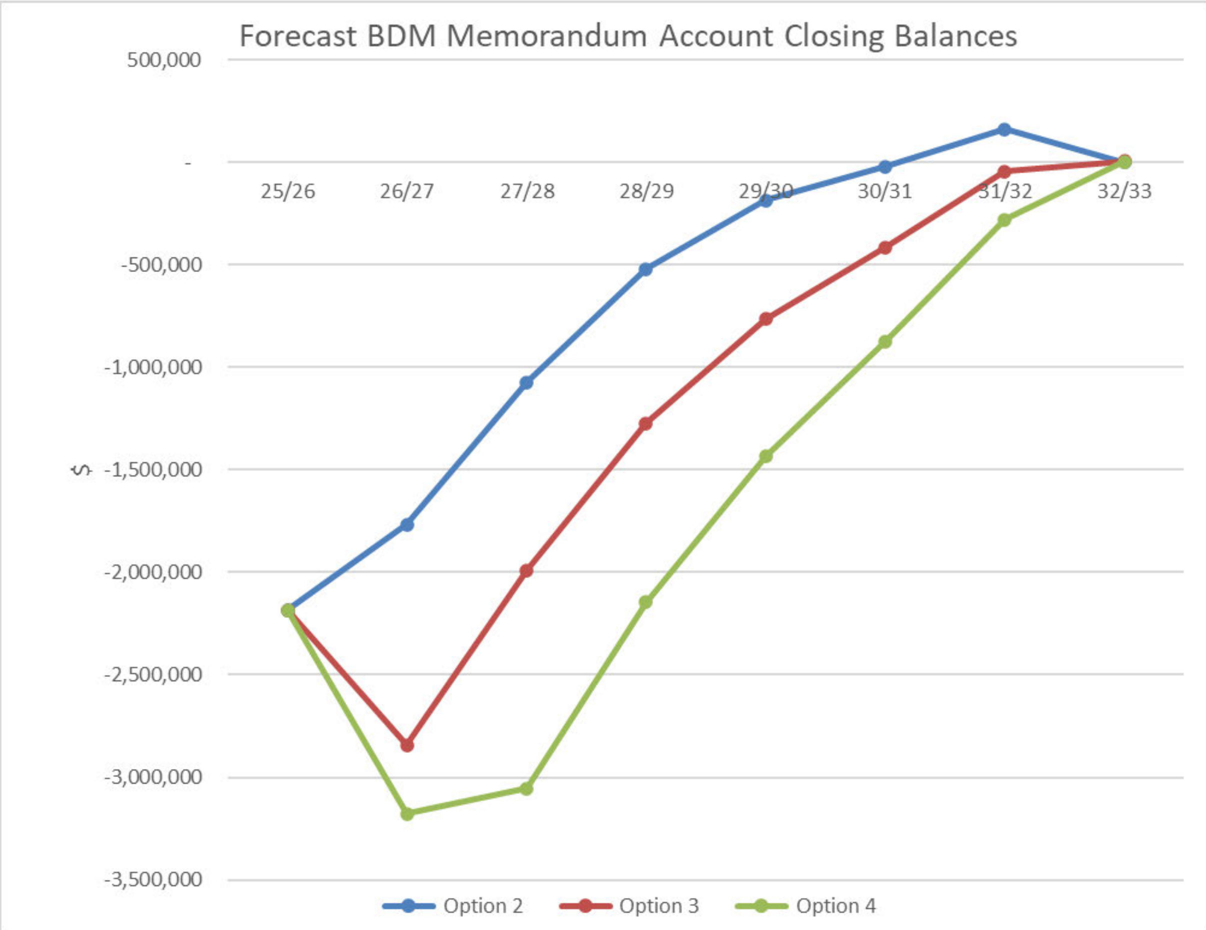
59. As per **Table 4** above, Option One (no fees increase) would not meet any of the objectives. Therefore, this option is not being assessed further as it is not a feasible option for this fees review.

Assessment of other options against objectives

Fiscal sustainability – return the Memorandum Account balance to near zero by 30 June 2033

60. Options Two, Three, and Four are all assessed as being much better than doing nothing/status quo in relation to this objective, as all options will return the balance of the Memorandum Account to near zero by 30 June 2033, shown by **Figure 2** below.

Figure 2: Forecast BDM Memorandum Account Closing Balances across all options



Equitable fees – ensure that each person receiving the benefit of a BDM service or product pays the full cost of providing the service/product to them

61. While all three fees increase options are assessed as being better than doing nothing/status quo in relation to this objective, Option Two would do comparatively better in meeting this objective. Under Option Two, the single fees increase in 2026 immediately results in those individuals receiving the benefit of a BDM service or product paying the full cost of providing the service/product.

62. Through staged increases to fees, Option Three and Option Four result in a smaller initial impact on individuals as the first increases to fees would be lesser than under Option

Two. However, this means that, while Option Three and Option Four will ultimately result in individuals paying the full cost of the BDM service or product that is being provided to them (making these options better than Option One), this will not occur until after the final fees increase – that being in 2027 under Option Three, and in 2028 under Option Four. Therefore, Option Two is the preferred option for meeting the objective of setting equitable fees.

Justifiable fees – the price for BDM services and products should only reflect the cost of providing the related BDM service or product

63. All three options are assessed as being slightly worse or worse than doing nothing/status quo in relation to this objective. Due to the objective of returning the Memorandum Account to a neutral balance by 2033, and the current deficit in the Memorandum Account, all three options propose fees increases that will both recover the costs of providing a BDM service/product and additionally contribute to recovering the deficit in the Memorandum Account. This means that part of the costs paid by those in the future for BDM services and products (after a fees increase) will, in effect, be paying part of the costs of BDM services and products that have already been provided to other individuals in the past (cross-subsidisation).[14]

64. While all three options result in some level of cross-subsidisation, Option Two is the preferred option in relation to this objective as, compared to the other options, cross-subsidisation is limited. As explained above, the staged fees increases proposed in Option Three and Option Four mean that individuals will not be paying the full cost of providing a BDM service/product until the final fees increase. As **Figure 2** above shows, the forecasted deficit in the Memorandum Account balance will increase even after the first fees increase is implemented. This means that those who pay for a BDM service and product after the last fees increase will be subsidising both the deficit in the Memorandum Account created until now (2025/2026), but also further increases in the deficit caused by smaller increases in 2026/2027. Therefore, those who pay for a service or product after the first increase will get the benefit of a lower increase and will not be paying the full costs of the product, while those in later years will be paying the full costs and subsidising the additional costs of earlier years.

65. Option Three scores slightly above Option Four as the two-stage increase of fees would result in less cross-subsidisation, however, it does not minimise cross-subsidisation as much as Option Two. Therefore, Option Two is the preferred option for meeting the objective of setting justifiable fees.

Efficient fees – the price for BDM services and products should be no higher than necessary to provide the service/product to the required high quality

66. The Department currently delivers high quality BDM services and products, which results in high levels of customer satisfaction. The last Kiwis Count quarterly survey (run by the Public Service Commission) found that 97% of our customers were satisfied with the services received. The Department's own recent survey of customer satisfaction found that 86% of the 6,000 respondents had trust and confidence in the Department, and 94% reported that the service had exceeded their expectations.

[14] The Department notes that cross subsidisation will be occurring between fees for the various BDM services and products, as well as between different time periods.

67. **Table 5** below shows that the Department consistently performs highly against its internal performance measures even though current fees do not allow for cost recovery (through supporting deficits from its balance sheet).

Table 5: Assessment against the Department's performance measures

Measures	Standards	2019/20	2020/21	2021/22	2022/23	2023/24
Ease of Identity and Life Event Services	At least 80%	88%	91%	91%	90%	87%
Identity and Life Event Services Issued or registered without error	At least 99%	99.9%	99.9%	99.8%	99.85%	99.85%
Births and death registrations; births, deaths, marriages and civil union certificates processed within business timeframes[15]	At least 99%	99.9%	97%	92%	96%	96.46%

68. Under the status quo, the deficit in the Memorandum Account will continue to grow which will impact the quality of the BDM services/products being provided as costs are not being met. Funding these services/products from the Department's balance sheet is not sustainable in the long term. Therefore, all three other options are assessed as being better than doing nothing/status quo in relation to the objective of efficiency.

69. However, Option Two would do comparatively better, as the single fees increase in 2026 immediately results in those individuals receiving the benefit of a BDM service or product paying the necessary fee to provide that service/product. It also begins to address the deficit in the Memorandum Account. While Option Three and Option Four do address these issues, this is over a longer period, due to the staged approach.

70. Additionally, compared to Option Three and Option Four, Option Two results in the lowest increase in each fee overall. Therefore, Option Two is the preferred option for meeting the objective of setting efficient fees.

Consultation

Public consultation

71. A limitation to this analysis is that no public consultation was undertaken. This is consistent with the process undertaken by the Department for other identity products. This is because discussion of fees increases generally leads to changes in demand from

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[15] Business timeframes: births registered within 8 days, deaths registered within 2 days, and BDM certificates and printouts issued within 5 days.

customers. While BDM services and product provision is less likely to face these demand pressures, discussion of fees changes would likely impact across product lines.

72. The anticipated risks associated with the lack of consultation are low, given that there are no new user charges being proposed, only amendments to the existing fees, and with engagement during public consultation historically having been low (see 2017 BDM fees review below). Most feedback previously received has been in favour of an increase to fees. There is also no change to the long-standing cost recovery model for BDM services and products in that the cost associated with providing them should be recovered from the individuals receiving the benefit of those services and products.

Public consultation as part of the 2017 BDM fees review

73. In the absence of public consultation in the 2025 BDM fees review, it is considered that the results of the public consultation undertaken as part of the 2017 BDM fees review could provide some insight into public sentiment on increases to BDM fees. The 2017 public consultation process received thirty-seven submissions.

74. The 2017 BDM fees review was of a much broader scope than the present fees review as it covered other aspects of the BDM system (such as whether celebrants generally should be required to pay an initial appointment and renewal fee, and whether the Department should consider other options for funding), as well as asking submitters to provide feedback on whether certificate and printout fees should be increased.

    - Twenty-three submitters agreed that certificate and printout fees should be increased. The majority of submitters noted that certificate and printout costs need to cover production costs, and that current fees have not accurately reflected the increase in production costs of time.
    - Fourteen submitters did not agree that certificate and printout fees should be increased. Some of these submitters thought that the fees at the time were sufficient as production processes should be less labour intensive and that technology and system improvements should allow for minimal manual handling.

75. The Department recognises that the concerns of these fourteen submitters may still be shared by the public if consultation were undertaken as part of the 2025 BDM fees review. However, the objectives of sustainability, equitability, justifiability, and efficiency used to assess the options proposed in this CRIS seek to mitigate these concerns by ensuring that fees are set to recover only the costs of providing a BDM service or product, and that the service/product provided is efficient.

Agency consultation

76. The Department undertook early consultation with the Ministry of Justice and the Treasury as these agencies were considered likely to have more detailed interest in the proposals.

77. The Ministry of Justice had no significant comments and made only a minor recommendation relating to the framing of the equitable and justifiable principles. This recommendation was applied.

78. The Treasury provided high level recommendations regarding the rationale for the proposals and overall framing. No concerns were raised about the specific detail of the proposals. Changes were made to reflect these recommendations.

Conclusions and recommendations

The best option when assessed against the objectives is Option Two

79. Overall, Option Two scores the highest across all options when weighed against the objectives of the fees increase. While all three options fully achieve the objective of recovering the deficit in the Memorandum Account by 30 June 2033, Option Two scores higher than all other options for both the equitable and justifiable fees objectives.

80. The single fees increase in Option Two, as opposed to the staged increases proposed in Option Three and Option Four, will result in individuals immediately paying for the cost of the BDM services and products that they receive the benefit of. This will also minimise the cross-subsidisation that must occur to address the current deficit in the Memorandum Account. A single fees increase will also ensure that there is no additional cross-subsidisation that occurs between each increase in a staged approach. Therefore, Option Two is the Department's preferred option for the increase to BDM service and product fees as assessed by the present CRIS.

Options directed to be considered by Cabinet

81. The Department is progressing the three options for fees increases for consideration by Cabinet (noting that Option One – status quo is not being proposed as it does not meet any of the objectives of a fees increase).

82. As examined above, these options are:

- **Option Two:** A single fees increase of 14.7% from 2026. This option would increase the cost of a:
    - standard birth certification from $33 to $38;
    - decorative birth certificate from $35 to $40; and a
    - notice of intended marriage from $150 to $172.
- **Option Three:** A two-stage fees increase of 7.7% in 2026 with a further fees increase of 7.7% in 2027. This option would increase the cost of a:
    - standard birth certificate from $33 to $36 in 2026, and to $38 in 2027;
    - decorative birth certificate from $35 to $38 in 2026, and to $41 in 2027; and a
    - notice of intended marriage from $150 to $162 in 2026, and to $174 in 2027.
- **Option Four:** A three-stage fees increase, with 5.6% fee increases in each 2026, 2027, and 2028. This option would increase the cost of a:
    - standard birth certificate from $33 to $35 in 2026, to $37 in 2027, and to $39 in 2028;
    - decorative birth certificate from $35 to $37 in 2026, to $39 in 2027, and to $41 in 2028; and a
    - notice of intended marriage from $150 to $158 in 2026, to $167 in 2027, and to $176 in 2028.

83. The Minister expressed an initial preference for Option Two, consistent with the Department’s preferred option in this CRIS.

Part B – options to increase the fee paid directly to celebrants for solemnising a marriage or civil union

Status quo

84. The Department sets a fee for registry ceremonies in the Marriage Regulations and the Civil Union Regulations. A registry ceremony differs from a personalised ceremony in that:

   - A **registry ceremony** can be held at any time on weekdays, excluding public holidays. Registry ceremonies have standard vows, are limited to ten guests, and requires that the marriage celebrant needs to reside within 10km of the location of the ceremony.
   - A **personalised ceremony** can be held at any time, on any day of the week, including public holidays. The couple can write their own vows and choose the location of the ceremony.

85. The fees charged for personalised ceremonies (as of 2025) are reported by CANZ as ranging between $400 - $1000 and are not standardised or regulated in any way. This is based off the Department's research and was confirmed by CANZ during consultation.

86. By contrast, registry ceremonies are offered by the Department at a standardised set fee so that a low-cost option remains available for couples seeking to have a marriage or civil union ceremony. Historically, these ceremonies were solemnised by Department or Court registrars (government employees) in registry offices.

87. However, since 2020, the Department and the Ministry of Justice ceased offering registry ceremonies solemnised by registrars. Instead, the Department has a contract with CANZ that enables Validated members of CANZ (VCANZ members) to perform this service on the Department's behalf, at the fee set in the Marriage Regulations and the Civil Union Regulations.[16] There were approximately 135 VCANZ members reported as offering registry ceremonies[17] as of November 2025, often performing these ceremonies in addition to personalised ceremonies.

88. VCANZ members no longer use registry offices to provide registry ceremonies, as these venues ceased being available when Court registrars stopped performing ceremonies. Instead, venues vary depending on what is offered by the celebrant, which may include hosting the ceremony at the celebrant's own home, the couple's home, or other venues.

89. The current fee now paid to celebrants for registry ceremonies was set at $90 in 2017, while the service was still performed by Court registrars in registry offices.

[16] This fee is regulated in combination with the fee for the notice of marriage or civil union, and can be found under matter 3 of the Schedule in the Marriage (Fees) Regulations 1995, and matter 2 of Schedule 1 in the Civil Union (Prescribed Information, Fees and Forms) Regulations 2005.

[17] It is noted that since these ceremonies are no longer being offered by registrars, they are no longer 'registry ceremonies' by nature, however, the registry-style ceremony offered by celebrants now is generally still referred to as a 'registry ceremony' and this CRIS will refer to these ceremonies as such.

Reviews of cost recovery charges

90. The current fee now paid to celebrants set for a registry ceremony is $90. This fee is set out in the Marriage Regulations and the Civil Union Regulations as part of the prescribed fee for a notice of intended marriage or civil union with solemnisation of that marriage/civil union by a registrar. The fee for this service is set out as being $240, of which a $150 fee[18] is paid to the Department for processing the notice of intended marriage. The remainder of the fee ($90) is paid directly to the celebrant conducting the ceremony as their fee.

Previous fee reviews

91. As noted above, historically registry ceremonies were performed by Court registrars. Therefore, the fee was paid directly into the Department's Memorandum Account. The fee was first set in 2005 at $51.50 as a reflection of the nature of the service at the time.

92. BDM fees were then reviewed by the Department every three years in line with cost recovery guidelines, but no adjustments to the fees were made due to the Memorandum Account showing a surplus balance until 2017 (as discussed in Part A of this CRIS). In 2017, the fee now paid to celebrants for registry ceremonies was adjusted to $90. However, this was part of the BDM fees review, and this reflected the general increase to all fees for BDM services and products.

93. As discussed above, the BDM fees review in 2020 did not result in any changes to fees for BDM services and products as the Memorandum Account was in surplus at the time. The 2020 fees review coincided with the Department and CANZ entering a contract for the provision of registry ceremonies. Therefore, the fees review in 2020 did not consider whether the fee for registry ceremonies needed to be changed on the basis that the service was no longer being provided by the Department.

The 2024 – 2025 fees review

94. The present BDM fees review began in late 2023, however, as noted above, the Minister directed that fees reviews for other identity products were to be completed before the BDM fees review was progressed. The BDM fees review began again in mid-2025.

95. The present fees review is the first time that the fee for registry ceremonies is being considered since VCANZ celebrants began providing the service on behalf of the Department. Therefore, the considerations are different from previous reviews, as the fee is now paid directly to the celebrant and not into the Memorandum Account.

96. As the fee is set in the Marriage Regulations and the Civil Union Regulations, it is appropriate to review the fee paid to celebrants now. This is because the regulations that would require amendment are the same as those that may be amended to increase fees for other BDM services and products.

Problem with the status quo

97. In 2023, CANZ submitted to the Department and the Ministry of Justice that the current $90 fee does not reflect the true cost of the service that celebrants provide in solemnising

[18] Noting that this is the current fee for this BDM service and does not reflect any increase in fee that may be implemented as per the proposals for increased fees in Part A of the present CRIS. **Table 1** in **Annex B** shows what the overall total cost may be for both options after an increase to both parts of the fee.

registry ceremonies, nor does it reflect the professional value of the service.[19] CANZ submitted that the low fee provides the public with the impression that a VCANZ celebrant's time and experience is of minimal value.

98. The Department recently undertook targeted consultation with CANZ on the options to increase the fee paid to celebrants for registry ceremonies. As part of this consultation process, CANZ updated their submission.[20] The written submission, dated 5 December 2025 from CANZ, restates the problem of registry ceremonies being undervalued, and further notes that:

- the $90 registry ceremony pricing has contributed to the erosion of personalised ceremony demand and has repositioned the market perception in the value of celebrants downward; and
- anecdotally, many CANZ members express willingness to complete VCANZ validation, but refrain as current compensation is insufficient. The $90 fee acts as a disincentive, rather than an incentive. In addition, several celebrants have (anecdotally) indicated that they do not intend to renew their VCANZ validation going forward as the income derived from registry ceremonies no longer justifies the required investment in time, compliance, and resources.

Cost Recovery Principles and Objectives

Principles

99. The fee for the provision of registry ceremonies is paid directly to celebrants as they undertake this service on behalf of the Department. Therefore, the approach taken is not a government cost recovery approach. Instead, the Department has set the following principles to assess the options:

- **Equitable:** the fee should be paid by the person receiving the full benefit of the service, reflect the true cost of the service, and the professional value offered by the VCANZ celebrant; and
- **Affordable:** the fee should reflect the purpose of the Department offering registry ceremonies at a standardised cost. This is so there is a low-cost option available, ensuring that marriage and civil union ceremonies are more accessible.

Objectives

100. The Department has set the following objectives for this fee review to enable the proposed options to be assessed for consistency with the principles above.

Objective One - to assess the principle of equitability: *the fees should be fair payment for the VCANZ celebrant's service*

101. The following objective has been set:

[19] The 2023 CANZ submission is provided as **Appendix A.**

[20] The 2025 CANZ submission is provided as **Appendix B.**

- **The fee should be fair payment for the VCANZ celebrant's service:** the fee set should reflect the cost of the service and professional value that a VCANZ celebrant brings in providing this service.

Objective Two – to assess the principle of affordability: *the fee should ensure registry ceremonies remain as a comparatively low-cost option*

102. The following objective has been set:

- **The fee should ensure registry ceremonies remain as a comparatively low-cost option:** the fee set should reflect the purpose of the Department regulating a standardised fee for registry ceremonies as an affordable and accessible alternative to non-standardised personalised ceremonies while still reflecting the costs incurred in providing the service.

Weighting of objectives

103. The Department regulates this fee so that there is a simple, lower-cost ceremony option available to couples that remains at a standardised cost (personalised ceremony fees are non-standardised). While the service itself is not a public good, many New Zealanders seek to enter into these legal relationships because of their values, culture or religion, for ease and/or for many other reasons. These legal relationships can hold a lot of weight not only for the individuals involved but for their extended family and friends. For that reason, it is important to ensure that there is an affordable option for this service available. This will ensure that if fees for personalised ceremonies are unaffordable and/or increase in the future, individuals are not inhibited from having marriage or civil union ceremonies due to the cost involved.

104. On that basis, the Department considers that the objective of ensuring registry ceremonies remain as a comparatively low-cost option (Objective Two) should be weighted slightly higher. The higher weighting illustrates that while the objective of ensuring the fee is fair payment for the celebrant's service is important, it is a more significant consideration that these costs should be kept low so as not to compromise the affordability of the service and impact accessibility. The higher weighting reflects the purpose and public good of the Department providing a regulated standardised low-cost ceremony option.

105. However, the Department appreciates the value a VCANZ celebrant brings in providing the service on behalf of the Department and recognises that the fee contributes to their income. The objective of ensuring a low-cost ceremony option should not be weighted so high as an objective that it results in the fee paid being an unfair reflection of a celebrant's professional value and being too low to cover the necessary costs incurred in providing the service.

106. Therefore, Objective One (fair payment) will be weighted **1x** and Objective Two (ensuring a comparatively low-cost ceremony) is weighted **1.5x**.

Policy Rationale: Why a user charge? And what type is most appropriate?

107. A user fee remains appropriate due to the service provided through conducting marriage/civil union ceremonies being considered a private good. The benefit of this service directly benefits only those who seek a registry ceremony.

108. This service is not Crown funded, and the Department does not have an operational budget dedicated to fund the service. **Table 1** in **Annex A** details the volume of registry ceremonies conducted by the Department in 2017/2018 (8,962 total) and 2018/2019 (10,479). This shows that only a small proportion of the New Zealand population use these services each year. As the Department ceased offering the service of a registry ceremony in 2020, data for more recent years is unavailable. However, it is likely that the trend of only a small proportion of the New Zealand population using a registry ceremony remains true.

109. Crown or Department funding would therefore result in the wider public funding a service that they are unlikely to ever receive benefit from. It is most equitable that those using and benefitting from a registry ceremony pay a user fee that recovers the full cost of providing this service. However, it is necessary to ensure that this fee is set at a reasonable cost due to the public good in providing an affordable and accessible option for marriage/civil union ceremonies.

The level of the proposed fee and its cost components (cost recovery model)

110. As noted previously, CANZ has submitted that the $90 fee paid to celebrants for providing a registry ceremony no longer reflects the costs incurred by the celebrant in conducting the ceremony nor the value provided by the service.

The pricing model

111. This is the first time that the fee paid for registry ceremonies has been proposed for change since VCANZ celebrants began providing registry ceremonies on behalf of the Department. Therefore, the approach to reviewing costs is significantly different from previous reviews of the fee. The Department relies on the written submission provided by CANZ during consultation on 5 December 2025 to help assess the costs associated with a VCANZ celebrant providing a registry ceremony, as well as other elements detailed below (such as CPI increases).

112. CANZ submitted that the hourly rate of the service should be charged at a tradesperson’s rate of $90 per hour. This is submitted as being the minimum charge for a tradesperson, however, the Department notes that there is no minimum hourly tradesperson charge set in New Zealand and that this can vary significantly depending on trade and location. There is also no directly comparable trade to the service a celebrant provides in conducting registry ceremonies as it is substantially different in nature from other standard trades such as electricians or plumbers.

113. Ultimately, it is unclear what a fair charging rate could be and a lesser per hour charging rate may be considered more appropriate.

114. The Department considered the costs structure submitted by CANZ set out in **Table 6** below, which is based on their proposed $90 per hour charge. The cost structure distinguishes between ceremonies offered in the celebrant’s venue (e.g. their own home) and ceremonies requiring travel to the location.

Table 6: Costs for registry ceremonies as provided by VCANZ

Item	Hours	Celebrant's Venue	Travel to Location
Administration - liaison with couple, printing of documents, follow up emails about location, payment	1.5	135	135
Ceremony time	0.5	45	45
Venue preparation Venue	0.5	45 15	
Business overheads – office, computer and screen, printer, paper and envelopes, ink		10	10
Travel time (30 minutes each way)	1.0	-	90
10 km return x2 at the IRD travel rate of $1.18 per km		-	23.60
Parking costs		-	5
Total Fees *Calculated at $90 / hour – tradesperson min. charge*		**$250.00**	**$308.60**

115. The Department considers the costs represented in the CANZ submission can be split into the following categories for the purposes of the pricing model:

- **Constant costs for registry ceremonies (apply irrespective of where the ceremony is held):** administration (liaison with couple, printing of documents, follow up emails about location, payment), ceremony time, business overheads.
- **Variable costs for registry ceremonies held at a celebrant's own venue:** venue preparation, venue.
- **Variable costs for registry ceremonies held at an external venue:** travel time, 10km return (x2) at the IRD travel rate of $1.18 per km, parking costs.

116. Given the difference in the variable costs (travel and venue set up) provided by CANZ, the Department proposes that a standardised time for the variable costs should be 0.5 hours for the purposes of the Department's pricing model. This is as:

- The average speed zone in most of urban New Zealand is 50km/hour and as a requirement for registry ceremonies is that celebrants reside within 10km of the location of a ceremony, it is more reasonable that travel time would be approximately 0.4 hours. This has been rounded up to 0.5 hours to reflect the additional costs for travel (10km return x2 at the IRD travel rate of $1.18 per km, and parking costs) as this is directly connected to the activities undertaken as part of travel.

117. The venue cost should be incorporated into the cost of venue preparation as the two are directly related

VCANZ professional costs

118. In addition to the costs above, CANZ submitted that there are also a range of required professional and business costs associated with being a VCANZ celebrant. These include:

- VCANZ validation, $200 every four years ($50 per year).
- Professional development through The Celebrant School, the Celebrants Training College, Celebrants Aotearoa conferences, and external training parties, all of which require personal investment.
- ACC levies, which vary depending on income category, with examples being $300 - $600.
- CANZ membership, $234 annually.
- Births, Deaths, and Marriages celebrant renewal fee, $60 annually.
- GST obligations for some celebrants.
- Tax obligations as self-employed contractors.

119. The Department notes that these costs cannot be fully covered by registry ceremonies or split between a certain number of ceremonies a celebrant performs per year. As CANZ noted, there is variance between how many ceremonies are performed by a celebrant both year-to-year and by region. However, these costs should still be accounted for due to the professional value offered by VCANZ members performing this service on behalf of the Department. The Department considers that recognition of this professional value can be accounted for in the charging rate per hour set for the service.

Consumer Price Index

120. The Department notes that the Consumer Price Index (CPI) has increased by 31.9% since the last fee increase in 2017. Based on the CPI alone, the fee should be increased from $90 to $118.72.

Comparative personalised ceremonies

121. The Department understands, through the research and consultation with CANZ, that fees for personalised ceremonies range from $400 - $1,000 (inclusive of the current $150 notice of marriage fee – putting the lowest fee paid to the celebrant at $250). The fees for basic, personalised ceremonies can be used as a comparative price point for the registry ceremony fee. Noting, however, that a registry ceremony is intended to be a more affordable option than a personalised marriage/civil union ceremony.

Proposed fee options

122. The first option assessed is the option of no fee increase:

- **Option One:** No fee increase.

123. The other three options consider the CPI increase since 2017, as well as other factors. Option Two and Option Three were developed based on the 2023 submission from CANZ. These options are:

- **Option Two:** An increase of the fee paid to celebrants for registry ceremonies from $90 to $250 (the increase requested by the CANZ submission).
    - The Department notes that this is still the option sought by CANZ in their December 2025 submission. **Table 6** above sets out the breakdown of costs that makes up the proposed figure of $250, including the charging

rate of $90 per hour to recognise the professional value a VCANZ celebrant brings to the registry ceremony service.

- **Option Three:** An increase of the fee paid to celebrants for registry ceremonies from $90 to $175. This option was based on the following considerations.
    - The rise in CPI since the last time fees were increased in 2017 (a rise of 31.9%, as discussed at paragraph 120).
    - The substantial difference in the service now being provided. The costs incurred in a registry ceremony being provided by VCANZ members is significantly different and incurs greater costs than those incurred by the Department/Ministry of Justice when registry ceremonies were being conducted by Court registrars in registry offices.
    - Considering the costs provided by CANZ in their December 2025 submission, and the Department's proposal on a standardised travel/venue cost (at paragraph 116), a total fee of $175 would result in a charging rate of $66 per hour.
    - **Table 7** below shows how this fee of $175 would break down across the different costs provided in the CANZ December submission.

Table 7: Option Three – breakdown of costs from a $175 fee paid to the celebrant

Item	Hours	Cost/Charge ($66 per hour)
Administration (liaison with couple, printing of documents, follow up emails about location, payment	1.5 hours	$99
Ceremony time	0.5 hours	$33
Business overheads (per ceremony)	N/A	$10
Travel (including travel costs)/Venue costs (including venue preparation)	0.5 hours	$33
Total		**$175**

124. Following targeted consultation with CANZ in December 2025, the Department developed an alternative fee increase option at a mid-point between Option Two and Option Three.

- **Option Four:** An increase of the fee paid to celebrants for registry ceremonies from $90 to $235. This option was based on the following considerations.
    - The $90 charged per hour, as proposed by CANZ in the December 2025 submission, to recognise the professional value a VCANZ celebrant brings to the registry ceremony service.

- The Department’s proposal on a standardised travel/venue cost (at paragraph 116).
- **Table 8** below shows how this fee of $235 has been calculated, using CANZ’s figure of $90 per hour, and the Department’s proposal on a standardised travel/venue cost.

Table 8: Option Four – breakdown of costs from a $235 fee paid to the celebrant

Item	Hours	Cost/Charge ($90 per hour)
Administration (liaison with couple, printing of documents, follow up emails about location, payment	1.5 hours	$135
Ceremony time	0.5 hours	$45
Business overheads (per ceremony)	N/A	$10
Travel (including travel costs)/Venue costs (including venue preparation)	0.5 hours	$45
Total		**$235**

Impact analysis

125. The four options (including the option of no fee increase) are assessed against the two objectives in **Table 10** below.

Table 9: Part B – Analysis of options against objectives

	Option One – no fee increase	**Option Two – increase of fee paid to celebrants for registry ceremonies to $250**	**Option Three – increase of fee paid to celebrants for registry ceremonies to $175**	**Option Four – increase of fee paid to celebrants for registry ceremonies to $235**
Fair payment for celebrant's service (no additional weighting)	0 The fee paid would not reflect the true cost of the service nor the professional value of the celebrants performing the service, as it reflects the fee set when Court registrars performed registry ceremonies, and has not been updated since 2017.	2.5 CANZ has submitted that this option would cover the costs outlined in the cost breakdown provided and best represents the professional value VCANZ celebrants bring to the service. However, in line with the Department's proposal regarding the additional travel and venue preparation costs in CANZ's submission, a fee increase to $250 may be more than fair payment for the service of providing a registry ceremony.	1.5 This option would cover the minimum necessary costs by reflecting the rise in CPI since the fee was set and also considers the substantially different nature of the service being provided than when offered by the Department/Ministry of Justice. It is noted that CANZ submitted that this fee would not cover the costs incurred nor reflect the professional value celebrants bring to the service. Therefore, this option is only slightly better than the status quo. However, the CANZ submission is based on a $90 per hour charging rate and it is unclear what a fair hourly charging rate is for this service. If a lesser charging rate is considered appropriate, this option may be better/much better than the status quo.	3 This option reflects the breakdown of costs provided by CANZ, but with the variable travel and venue set up costs encompassed within the rate of $90 per hour. This option will cover the costs provided by CANZ and recognise their professional value with a charge of $90 per hour, making the option much better than the status quo.
Comparatively low-cost ceremony option (weighted x1.5)	0 A $90 fee is a low-cost option but does not cover the costs incurred by celebrants in providing the service of a registry ceremony.	1 **(1.5)** This fee increase would result in a lower cost option than most personalised ceremonies while reflecting the costs incurred in providing the service of a registry ceremony. However, the 177.78% fee increase to $250 would be a significant increase for those looking to utilise the service of a registry ceremony and would be comparative to the price paid for basic, personalised ceremonies. Therefore, this option would result in the greatest increase to the status quo and is the least low-cost option.	3 **(4.5)** This option would reflect a 94.44% increase from the $90 fee, which is a significant increase for users. However, the fee would still be much lower than the price paid to celebrants for basic, personalised ceremonies, reflecting the purpose of a registry ceremony, while still reflecting the minimum necessary costs incurred in providing the registry ceremony service. Therefore, this option is much better than the status quo.	2 **(3)** This option would be an increase of 161.11% from the status quo and is not as affordable as Option Three. However, this option would closer reflect the costs quote by CANZ in the December 2025 submission while still being lower than both Option Two and the price paid to celebrants for basic, personalised ceremonies. However, this is a greater fee increase and not as affordable as the increase proposed at Option Three.
Overall assessment (out of 7.5)	**0**	**4**	**6**	**6**

Key for scoring in Table 9			
3	Much better than doing nothing/status quo	- 1	Slightly worse than doing nothing/status quo
2	Better than doing nothing/status quo	- 2	Worse than doing nothing/status quo
1	Slightly better than doing nothing/status quo	- 3	Much worse than doing nothing/status quo
0	The same as doing nothing/status quo		**Bracketed figures incorporate weighting of objectives**

The option of no fee increase does not meet the objectives

126. As per **Table 9** above, Option One (no fee increase) would not meet any of the objectives. Therefore, this option is not being assessed further as it is not a feasible option for this fee increase.

Assessment of other options against objectives

Objective: The fee should be fair payment for the VCANZ celebrant's service – the fee set should reflect the true cost of the service and professional value that a VCANZ celebrant brings in providing this service

127. The submission from CANZ states that the current low fee is anecdotally deterring celebrants from becoming VCANZ members and providing the service of a registry ceremony. Options Two, Three, and Four should, at the margin, decrease this risk as it is an increase to the status quo fee. Therefore, all options are better than the status quo.

128. Option Four scores highest against this objective as the Department considers this option reflects the true cost of the service provided. The Department took into factor the quoted costs and time for administration, the ceremony itself, and business overheads per ceremony, as provided by CANZ, in developing this option. We have also considered the quoted costs for venue preparation time and travel time, but have acknowledged that these will vary, and have approached this by factoring in half an hour of charge time that covers the quoted costs incurred for venue hire and travel. Option Four reflects a $90 per hour charge rate for VCANZ celebrants, which was quoted by CANZ as being reflective of the professional value that VCANZ celebrants bring when providing the registry ceremony options.

129. While Option Two is the option submitted by CANZ and also reflects the $90 per hour charge rate, the Department considers there is potential that the fee increase proposed may result in overcompensation. As discussed earlier, the Department proposes that additional fees for travel and venue preparation should be absorbed into the cost in time that is charged for travel and venue (in the CANZ submission). Therefore, Option Two could result in a higher fee charged for registry ceremonies than is required as these costs are not absorbed in the breakdown provided by CANZ.

130. Option Three is slightly better than the status quo as it factors in more of the costs of the service and the professional value of a VCANZ celebrant than the status quo. However, feedback from CANZ during consultation indicated that an increase to $175 would not reflect the true cost of the service nor the professional value of a VCANZ celebrant in providing a registry ceremony. CANZ submitted that the fee should be grounded in the actual time required and the scope of responsibilities undertaken, compensated at a fair and market-appropriate rate (submitted as being $90 per hour) rather than using personalised ceremony fees as a standalone benchmark. As noted above, the Department considers that it is unclear what a fair charging rate would be for this service, and it could be considered that a lesser per hour charging rate is considered appropriate.

131. Overall, Option Four scores the highest against this objective.

Objective: the fee should ensure registry ceremonies remain as a comparatively low-cost option – the fee set should reflect the purpose of the Department regulating a standardised fee for registry ceremonies as an affordable and accessible alternative to non-standardised personalised ceremonies while still reflecting the costs incurred in providing the service.

132. As discussed earlier, it is important that a regulated low-cost option for registry ceremonies is available for those seeking to solemnise their marriage or civil union. This importance reflects the significance that legalising these relationships can have for many New Zealanders. A regulated, more affordable option ensures that individuals are not inhibited from having these ceremonies if fees for personalised ceremonies are unaffordable and/or increase in the future.

133. However, while this fee should be kept low-cost, it should not be to the point where the fee does not cover the necessary costs incurred in providing the service. We have heard from CANZ and anecdotally from other celebrants that the current fee does not cover these costs, and is not comparative to fees charged for basic, personalised ceremonies (the closest comparative service for registry ceremonies). The Department's assessment assumes that the status quo is not sufficient to cover costs and compares the options against our understanding of personalised ceremonies. This ensures that the fee proposed remains at the lower end of that scale as a regulated, affordable option while still covering the costs of providing the service. From the Department's research and consultation with CANZ, the Department understands that the lowest fee paid for basic, personalised ceremonies is around $400 with $250 of this going to the celebrant ($150 for the notice of marriage/civil union).

134. Option Two is the highest increase compared to the status quo. This option is comparative to the lowest price paid for basic, personalised ceremonies. This option is also the least affordable option compared to Options Three and Four. While CANZ has established that this increase would meet the costs incurred in providing the service, this would be a significant increase of 177.78% which may not be considered an affordable increase.

135. Option Four is more affordable than Option Two and would sit slightly lower than the lowest fee paid for basic, personalised ceremonies. However, Option Four imposes a 161.11% on users which is not as affordable as Option Three.

136. Option Three is the most affordable option of all proposed options. While an increase of 94.4% is still significant, a lesser increase would be less likely to ensure that those necessary costs to provide a registry ceremony are covered. This option seeks to keep the fee low-cost while recognising the costs incurred by celebrants in providing a registry ceremony. It is noted that CANZ submitted that Option Three would not reflect the true cost of providing the registry ceremony nor the professional value of a VCANZ member. However, the Department considers that this option would cover the minimum necessary costs incurred.

137. As part of assessing the low-cost objective, it is also important to consider what the overall fee paid for a registry ceremony would be, inclusive of the notice of marriage fee. If the fee is increased by the preferred fees increase option in Part A (which would be 14.7%, or to $172 for the notice of marriage), the total fees paid under each fee increase option would be:

- Option Two: $250 + $172 = $422
- Option Three: $175 + $172 = $347
- Option Four: $235 + $172 = $407

138. As **Table 1** in **Annex B** shows, regardless of the option chosen in Part A of this CRIS, Option Two would result in the overall increased fee for registry ceremonies (including

the notice of marriage) being the lower cost option compared to fees for personalised ceremonies.

Consultation

139. The Department based the original options developed (Options Two and Three) on the submission made by CANZ in September 2023. The Department also undertook targeted consultation with CANZ on the preferred option at the time (Option Three – $175) in December 2025. This consultation provided valuable breakdowns of cost reflected in the pricing model section of the CRIS, and feedback on the $175 option.

140. Consultation also prompted the development of the additional Option Four to reflect the costs described in the written submission provided by CANZ. CANZ noted their ongoing appreciation for the contract they have with the Department to provide registry ceremonies. CANZ are committed to maintaining this service for the benefit of New Zealanders.

141. The CANZ submission also noted that:

> *"the notion of "public good" through low-cost registry ceremonies is understood and respected. However, the assumption that demand will materially decrease if fees increase does not appear to be supported by behavioural evidence. In our experience, couples choose registry ceremonies primarily for simplicity and directness of process, not for price alone. The demand for registry ceremonies is not price elastic."*

142. While the Department respectfully acknowledges this comment, we note that the purpose of the Department regulating the fee for registry ceremonies is so that a standardised, reasonably affordable ceremony option remains available. Therefore, keeping the fee as a lower-cost option remains one of the key objectives for the fee review, particularly in the absence of public comment on price not being of concern and recognising the current cost-of-living crisis.

143. The Department also notes that CANZ submitted that the fee paid to celebrants for conducting registry ceremonies should be reviewed every two years. The Department considers that it is more appropriate for this fee to continue to be reviewed together with the fees review for all BDM services and products which occurs every three years.

144. Our analysis is constrained by the lack of public consultation on the proposed registry ceremony fees. However, the anticipated risks associated with lack of consultation are low given that there are no new user charges being proposed, only amendments to the existing fee. There is also no change to the long-standing cost-recovery model for registry ceremonies in that the cost associated with conducting a registry ceremony should be recovered from the individuals receiving the benefit of that service.

Conclusions and recommendations

Option Three and Four score equally overall against the objectives

145. Both Option Three and Option Four score equally overall, with Option Three (increase to $175) doing best against the comparatively low-cost objective, and Option Four (increase to $235) doing best against the fair payment objective. Option Two (increase to $250) scores marginally lower than the other two options, ultimately doing well against the fair payment objective but the worst against the low-cost objective.

146. As discussed above, CANZ has submitted that Option Three will not cover the costs incurred in providing the service nor does it reflect the professional value of celebrants. Option Four is more likely to meet the objective of fair payment in accordance with CANZ's submission. However, as noted earlier, it is difficult to determine the objectively appropriate charging rate per hour. Therefore, the fee of $175 may be considered fair payment if $66 per hour is a more appropriate charging rate (as opposed to the $90 per hour proposed by CANZ).

147. Given the equal scoring between the two options across the two objectives, it is noted that the choice between Option Three and Option Four is ultimately up to the decision-maker's views and preference between the two objectives.

The Minister's preferred option is Option 3: increase to $175

148. The Minister has indicated a preference for Option Three as it is the option with the lowest fee increase and prioritises the low-cost objective.

Implementation plan

149. Fees increase for BDM services and products and an increase to the fee paid to celebrants for solemnising a marriage or civil union would be given effect to through an amendment to the BDMR Regulations, the Marriage Regulations, and the Civil Union Regulations which sets out these fees. Once Cabinet agreement has been provided to any change in the fees, drafting instructions will be issued for a new Schedule of fees under the above regulations. The fees changes would apply from the date the amended regulations take effect.

150. Additionally, the Department will need to implement system changes necessary to give effect to the new fees for BDM services and products (the fee for solemnising a marriage or civil union is paid directly to celebrants). The level of risk is low as the system changes involve a relatively simple update of the fees table built into the system. Risks will be identified, and mitigation strategies identified and documented in the project plan. Risks will be regularly reviewed over the implementation period.

Cost efficiencies

151. As noted above, the Department is continuing to explore more savings that may be achievable through the use of technology to reduce the costs in providing BDM services and products.

Monitoring and evaluation

152. In accordance with the Treasury guidelines for cost recovery, the Department reviews cost recovery fees every three years and will continue to do so. A three-yearly review allows the Department to assess changes in the forecast and monitor the objective of recovering the deficit in the Memorandum Account by 30 June 2033. This includes whether any work to increase savings through the use of technology has impacted the costs of providing BDM services and products.

153. The Department monitors and reports on its cash flow on a regular monthly basis and publishes information on Memorandum Account annual revenue, expenses, and opening and closing balances in its Annual Report.

154. The Department also collects data on application volumes and work on hand for BDM service and product applications to assess its performance against the key metrics set out in the Estimates of Appropriation for Internal Affairs: The metrics for BDM services and products are as follows:

    a. 80% of people report that identity and life event services are easy to use.
    b. At least 99% of identity and life events issues are registered without error.
    c. At least 90% of birth and death registrations, birth, death, marriages, and civil union certificates and printouts are processed within business timeframes.
    d. At least 80% of all identity and life event applications received are via the online service.

155. The Department reports externally on its performance against the standards and measures in its Annual Report which is publicly available. The Department also monitors performance against these standards on a monthly basis.

Review

156. The cost recovery regime for BDM services and products will be reviewed every three years. The reviews will look at:

    e. A revised forecast of future demand for BDM services and products over the next ten years.

    f. The revenue the Department expects to receive from BDM services and products over the next ten years.

    g. The forecast expenses for providing BDM services and products over the next ten years.

    h. Any required investments to maintain registration systems.

    i. Any known demographic factors or policy changes that could impact forecasts.

157. Any significant change in customer demand or costs could also precipitate an earlier review of the fees for BDM services and products.

158. The Department will engage with CANZ regularly to monitor the fee paid to celebrants for registry ceremonies and engage in a review of this fee alongside the three-year reviews for all fees paid for BDM services and products.

Annex A[21]

Table 1: Table 1 below sets out the services provided under the Births, Deaths, Marriages and Relationships Registration (Fees) Regulations 1995, the Marriage (Fees) Regulations 1995, and the Civil Union (Prescribed Information, Fees, and Forms) Regulations 2005. The table includes the current GST inclusive fees for all services. It also includes the GST inclusive fees that would be payable under Options Two, Three, and Four proposed in Part A of the Births, Deaths, and Marriages Services and Products Fees Review 2025 Cost Recovery Impact Statement (Option One being no fees increase). These options are:

- **Option Two:** A single fees increase of 14.7% from 2026.
- **Option Three:** A two-stage fees increase of 7.7% in 2026 with a further increase of 7.7% in 2027.
- **Option Four:** A three-stage fees increase, with 5.6% increases in 2026, 2027, and 2028.

Service/Product	Current Fee (Status Quo/Option One)	Option Two 14.7%	Option Three 7.7% & 7.7%	Option Four 5.6% & 5.6% & 5.6%
Births, Deaths, Marriages and Relationships Registration (Fees) Regulations 1995				
Search in respect of event under 1 name for a given year (plus 1 year either side)	$25	2026 - $29	2026 - $27 2027 - $29	2026 - $26 2027 - $28 2028 - $29
Continuation of search at the same time for each event under 1 name for each additional year	$1	2026 - $1	2026 - $1 2027 - $1	2026 - $1 2027 - $1 2028 - $1
Inspection of any document	$25	2026 - $29	2026 - $27 2027 - $29	2026 - $26 2027 - $28 2028 - $29

21 All pricing figures provided are inclusive of GST.

Service/Product	Current Fee (Status Quo/Option One)	Option Two 14.7%	Option Three 7.7% & 7.7%	Option Four 5.6% & 5.6% & 5.6%
Copy of any document	$25	2026 - $29	2026 - $27 2027 - $29	2026 - $26 2027 - $28 2028 - $29
Electronic printout of any document	$25	2026 - $29	2026 - $27 2027 - $29	2026 - $26 2027 - $28 2028 - $29
Certificate other than a decorative certificate	$33	2026 - $38	2026 - $36 2027 - $38	2026 - $35 2027 - $37 2028 - $39
Decorative certificate	$35	2026 - $40	2026 - $38 2027 - $41	2026 - $37 2027 - $39 2028 - $41
Certificate and decorative certificate (if available) packs	$55	2026 - $63	2026 - $59 2027 - $64	2026 - $58 2027 - $61 2028 - $65
Certified copy of deed poll	$25	2026 - $29	2026 - $27 2027 - $29	2026 - $26 2027 - $28 2028 - $29
Change of child's name within 2 years of birth	$55	2026 - $63	2026 - $59 2027 - $64	2026 - $58 2027 - $61 2028 - $65

Service/Product	Current Fee (Status Quo/Option One)	Option Two 14.7%	Option Three 7.7% & 7.7%	Option Four 5.6% & 5.6% & 5.6%
Change of name	$170	2026 - $195	2026 - $183 2027 - $197	2026 - $180 2027 - $190 2028 - $200
Change of name in relation to a marriage or civil union	$55	2026 - $63	2026 - $59 2027 - $64	2026 - $58 2027 - $61 2028 - $65
Registering nominated sex	$55	2026 - $63	2026 - $59 2027 - $64	2026 - $58 2027 - $61 2028 - $65
Verification of death of adopted person, adoptive parents, or adoptive person’s natural parents	$55	2026 - $63	2026 - $59 2027 - $64	2026 - $58 2027 - $61 2028 - $65
Deposit of overseas death certificate	$55	2026 - $63	2026 - $59 2027 - $64	2026 - $58 2027 - $61 2028 - $65
Statement of recorded information about an overseas death	$25	2026 - $29	2026 - $27 2027 - $29	2026 - $26 2027 - $28 2028 - $29
Verification when correct year given of information contained in an entry	$25	2026 - $29	2026 - $27 2027 - $29	2026 - $26 2027 - $28 2028 - $29

Service/Product	Current Fee (Status Quo/Option One)	Option Two 14.7%	Option Three 7.7% & 7.7%	Option Four 5.6% & 5.6% & 5.6%
Deposit of overseas divorce or dissolution certificate	$55	2026 - $63	2026 - $59 2027 - $64	2026 - $58 2027 - $61 2028 - $65
Request for Statement whether certificate or information received in relation to an overseas divorce or dissolution certificate	$25	2026 - $29	2026 - $27 2027 - $29	2026 - $26 2027 - $28 2028 - $29
Marriage (Fees) Regulations 1995				
For every notice of a marriage (to be solemnised by a marriage celebrant)	$150	2026 - $172	2026 - $162 2027 - $174	2026 - $158 2027 - $167 2028 - $177
Applying for a certificate of no impediment to marriage	$170	2026 - $195	2026 - $183 2027 - $197	2026 - $180 2027 - $190 2028 - $200
For every notice of a marriage and solemnisation of a marriage by a registrar[22]	$240	2026 - $262	2026 - $252 2027 - $264	2026 - $248 2027- $257 2028 -$267

[22] Note these figures are based on no change being made to the current fee paid to registrars/celebrants, i.e. the celebrant fee stays at $90. Table 1 in Annex B shows what the total fee would be if the celebrant fee is increased as discussed in Section 2 of the Cost Recovery Impact Statement.

Service/Product	Current Fee (Status Quo/Option One)	Option Two 14.7%	Option Three 7.7% & 7.7%	Option Four 5.6% & 5.6% & 5.6%
Additional fee in respect of a marriage celebrated by a registrar outside normal hours	$55	2026 - $63	2026 - $59 2027 - $64	2026 - $58 2027 - $61 2028 - $65
Lodgement of a caveat	$55	2026 - $63	2026 - $59 2027 - $64	2026 - $58 2027 - $61 2028 - $65
Application for name to be entered on list of marriage celebrants as an independent celebrant (unless a fee has already been paid for an application to be registered as a civil union celebrant)	$220	2026 - $252	2026 - $237 2027 - $255	2026 - $232 2027 - $245 2028 - $259
Application for name to be entered on a list of marriage celebrants as a celebrant nominated by an approved organisation (unless a fee has already been paid for an application for appointment as a civil union celebrant)	$150	2026 - $172	2026 - $162 2027 - $174	2026 - $158 2027 - $167 2028 - $177
Application for an independent celebrant to continue to act as a marriage celebrant (unless a fee has already been paid for an application for reappointment as a civil union celebrant)	$60	2026 - $69	2026 - $65 2027 - $70	2026 - $63 2027 - $67 2028 - $71
Application for a celebrant nominated by an approved organisation to continue to act as a marriage celebrant (unless a fee has already been paid for an application for reappointment as a civil union celebrant)	$30	2026 - $34	2026 - $32 2027 - $35	2026 - $32 2027 - $33 2028 - $35
Civil Union (Prescribed Information, Fees, and Forms) Regulations 2005				

Service/Product	Current Fee (Status Quo/Option One)	Option Two 14.7%	Option Three 7.7% & 7.7%	Option Four 5.6% & 5.6% & 5.6%
Giving notice of intended civil union (including change of form of relationship from marriage) to be solemnised by a celebrant or exempt body	$150	2026 - $172	2026 - $162 2027 - $174	2026 - $158 2027 - $167 2028 - $177
Giving notice of intended civil union (including change of form of relationship from marriage) and solemnisation of civil union by a registrar[23]	$240	2026 - $262	2026 - $252 2027 - $264	2026 - $248 2027 - $257 2028 - $267
Applying for a certificate of no impediment to civil union	$170	2026 - $195	2026 - $183 2027 - $197	2026 - $180 2027 - $190 2028 - $200
Additional fee for a Registry Office civil union solemnised outside normal hours	$55	2026 - $63	2026 - $59 2027 - $64	2026 - $58 2027 - $61 2028 - $65
Lodging notice of objection to proposed civil union (including notice lodged together with a caveat against the marriage of the person)	$55	2026 - $63	2026 - $59 2027 - $64	2026 - $58 2027 - $61 2028 - $65
Application for appointment as a civil union celebrant (unless a fee has already been paid for an application for name to be entered on list of marriage celebrants, whether independent celebrant or nominated by an approved organisation)	$220	2026 - $252	2026 - $237 2027 - $255	2026 - $232 2027 - $245 2028 - $259

[23] Note these figures are based on no change being made to the current fee paid to registrars/celebrants, i.e. the celebrant fee stays at $90. Table 1 in Annex B shows what the total fee would be if the celebrant fee is increased as discussed in Section 2 of the Cost Recovery Impact Statement.

Service/Product	Current Fee (Status Quo/Option One)	Option Two 14.7%	Option Three 7.7% & 7.7%	Option Four 5.6% & 5.6% & 5.6%
Application for reappointment as a civil union celebrant (unless a fee has already been paid for an application to continue to act as a marriage celebrant, whether independent celebrant or nominated by an approved organisation)	$60	2026 - $69	2026 - $65 2027 - $70	2026 - $63 2027 - $67 2028 - $71

Table 2: Table 2 below sets out volumes of births, deaths, marriage and civil union services and products.

Service/Product	2017 - 2018	2018 - 2019	2019 - 2020	2020 - 2021	2021 - 2022	2022 -2023	2023 – 2024
Births, Deaths, Marriages and Relationships Registration (Fees) Regulations 1995							
Search in respect of event under 1 name for a given year (plus 1 year either side)	191	250	N/A	N/A	N/A	N/A	N/A
Copy of any document	412	424	845	985	882	675	518
Electronic printout of any document	24,552	26,064	25,045	27,693	24,349	24,945	22,826
Standard birth certificate	90,490	94,116	87,410	93,087	97,685	100,343	104,807
Decorative birth certificate	56,748	66,392	63,923	67,814	69,652	68,413	68,609
Certificate and decorative certificate (if available) packs	12,762	12,272	12,019	12,707	14,356	13,225	13,117

Service/Product	2017 - 2018	2018 - 2019	2019 - 2020	2020 - 2021	2021 - 2022	2022 -2023	2023 – 2024
Death certificates	50,617	51,187	51,934	52,426	56,017	59,340	58,205
Certified copy of deed poll	76	44	42	30	N/A	N/A	N/A
Change of child's name within 2 years of birth	708	650	607	608	534	627	594
Change of name	5,991	6,231	5,249	5,290	4,535	5,416	5,184
Change of name in relation to a marriage or civil union	174	219	195	213	227	237	221
Registering nominated sex	30	24	36	33	N/A	N/A	702
Verification of death of adopted person, adoptive parents, or adoptive person's natural parents	149	214	155	172	137	126	104
Deposit of overseas death certificate	6	18	3	1	.	8	13
Statement of recorded information about an overseas death	2	14	3	.	.	6	11
Marriage (Fees) Regulations 1995							
For every notice of a marriage (to be solemnised by a marriage celebrant)	17,799	20,822	20,889	18,584	18,036	22,690	21,033
Applying for a certificate of no impediment to marriage	1,939	1,860	1,453	821	908	1,409	1,472

Service/Product	2017 - 2018	2018 - 2019	2019 - 2020	2020 - 2021	2021 - 2022	2022 -2023	2023 – 2024
For every notice of a marriage and solemnisation of a marriage by a registrar[24]	8,945	10,455	-	-	-	-	-
Additional fee in respect of a marriage celebrated by a registrar outside normal hours	2	1	-	-	-	-	-
Lodgement of a caveat	4	3	3	4	3	1	6
Application for name to be entered on list of marriage celebrants as an independent celebrant (unless a fee has already been paid for an application to be registered as a civil union celebrant)	675	746	822	707	703	651	583
Application for name to be entered on a list of marriage celebrants as a celebrant nominated by an approved organisation (unless a fee has already been paid for an application for appointment as a civil union celebrant)	297	249	229	318	242	274	233
Application for an independent celebrant to continue to act as a marriage celebrant (unless a fee has already been paid for an application for reappointment as a civil union celebrant)	2,491	2,740	3,084	3,377	3,177	3,187	3,061

[24] Note these figures are based on no change being made to the current fee paid to registrars/celebrants, i.e. the celebrant fee stays at $90. Table 1 in Annex B shows what the total fee would be if the celebrant fee is increased as discussed in Section 2 of the Cost Recovery Impact Statement. Note also that no data is available after 2019 as the Department and Ministry of Justice ceased offering the service of a registry ceremony.

Service/Product	2017 - 2018	2018 - 2019	2019 - 2020	2020 - 2021	2021 - 2022	2022 -2023	2023 – 2024
Application for a celebrant nominated by an approved organisation to continue to act as a marriage celebrant (unless a fee has already been paid for an application for reappointment as a civil union celebrant)	2,694	2,620	2,580	2,554	2,613	2,575	2,474
Civil Union (Prescribed Information, Fees, and Forms) Regulations 2005							
Giving notice of intended civil union (including change of form of relationship from marriage) to be solemnised by a celebrant or exempt body	92	63	31	55	44	48	-
Giving notice of intended civil union (including change of form of relationship from marriage) and solemnisation of civil union by a registrar[25]	17	24	17	-	-	-	-
Applying for a certificate of no impediment to civil union	24	40	13	21	45	42	-

[25] Note these figures are based on no change being made to the current fee paid to registrars/celebrants, i.e. the celebrant fee stays at $90. Table 1 in Annex B shows what the total fee would be if the celebrant fee is increased as discussed in Section 2 of the Cost Recovery Impact Statement. Note also that no data is available after 2019 as this is when the Department and Ministry of Justice ceased offering the service of a registry ceremony.

Annex B[26]

Table 1: Table 1 below shows the current fee paid to celebrants for a registry ceremony for a marriage/civil union, the total cost of a notice of a marriage/civil union and solemnisation of a marriage by a registrar, and total costs based on each option available under both Part A and Part B of the CRIS.

Option (combination of options from Part A and Part B)	Celebrant fee	Total
No fees increase for BDM services and products **(option one)** + No fees increase for fee paid to celebrants for registry ceremonies **(option one)**	$90	$240
Single fees increase for BDM services and products of 14,7% from 2026 **(option two)** + Am increase of the fee paid to celebrants for registry ceremonies from $90 to $250 **(option two)**	$250	2026 - $422
Two-stage fees increase for BDM services and products of 7.7% in 2026 with a further fee increase of 7.7% in 2027 **(option three)** + An increase of the fee paid to celebrants for registry ceremonies from $90 to $250 **(option two)**	$250	2026 - $412 2027 - $424
Three-stage fees increase for BDM services and products of 5.6% in 2026, 2027, and 2028 **(option four)** + An increase of the fee paid to celebrants for registry ceremonies from $90 to $250 **(option two)**	$250	2026 - $408 2027 - $417 2028 - $427
Single fees increase for BDM services and products of 14.7% from 2026 **(option two)** + An increase of the fee paid to celebrants for registry ceremonies from $90 to $175 **(option three)**	$175	2026 - $347

[26] All pricing figures provided are inclusive of GST.

Two-stage fees increase for BDM services and products of 7.7% in 2026 with a further fee increase of 7.7% in 2027 **(option three)** + An increase of the fee paid to celebrants for registry ceremonies from $90 to $175 **(option three)**	$175	2026 - $337 2027 - $349
Three-stage fees increase for BDM services and products of 5.6% in 2026, 2027, and 2028 **(option four) +** An increase of the fee paid to celebrants for registry ceremonies from $90 to $175 **(option three)**	$175	2026 - $333 2027 - $342 2028 - $352
Single fees increase for BDM services and products of 14.7% from 2026 **(option two)** + An increase of the fee paid to celebrants for registry ceremonies from $90 to $235 **(option four)**	$235	2026 - $407
Two-stage fees increase for BDM services and products of 7.7% in 2026 with a further fee increase of 7.7% in 2027 **(option three)** + An increase of the fee paid to celebrants for registry ceremonies from $90 to $235 **(option four)**	$235	2026 - $397 2027 - $409
Three-stage fees increase for BDM services and products of 5.6% in 2026, 2027, and 2028 **(option four) +** An increase of the fee paid to celebrants for registry ceremonies from $90 to $235 **(option four)**	$235	2026 - $393 2027 - $402 2028 - $412

Appendix A: Celebrants Aotearoa – Celebrants Association of New Zealand submission September 2023

The Marriage (Fees) Regulations 1995 (SR 1995/186) Schedule[27] sets the fee payable for *"every notice of a marriage and solemnisation of marriage by a registrar"*[28] at **$240.**

This fee seems not to have changed in 28 years.

In 2020, the Department of Internal Affairs (DIA) approved VCANZ celebrants (members of Celebrants Aotearoa who had achieved "validated" status within their professional Association) to conduct "Registry ceremonies" in their local community.

Couples who choose to be married in a Registry ceremony pay their VCANZ celebrant **$90.** This sum is the remainder of the fee payable in the Schedule (Matter No.3) once the $150 licence fee is paid to DIA.

As of September 2023, there are 157 VCANZ celebrants. They enjoy the privilege of conducting Registry ceremonies and report that the experience of doing so is a useful complement to their overall practice as professional celebrants. It is a role they wish to continue.

VCANZ Celebrants also consider that there is sufficient anecdotal evidence to support their fee being increased substantially from $90 to appropriately and fairly recompense the work undertaken, and the value provided to the public on behalf of DIA.

Celebrants Aotearoa respectfully submits that the fee payable to VCANZ celebrants[29] to solemnise a "Registry ceremony" should be raised to $250 for the following reasons:

The current fee was set when Registry ceremonies were solemnised by DIA Registrars in the Registry Office or Courthouse. The fee does not appropriately reflect or value the ways in which a celebrant-led Registry ceremony provides a different ceremony experience for the public.

(a) VCANZ celebrants bring a depth of experience and style to each Registry ceremony and provide couples with choice regarding the venue in which the ceremony can be held.

(b) VCANZ celebrants invest time and money to obtain Celebrants Aotearoa accreditation and DIA approval to conduct Registry ceremonies. The fee to apply to be a VCANZ celebrant is $200 (incl GST); annual CANZ membership is $225 (incl GST); the annual fee to renew registration as a celebrant with DIA is $60.

(c) VCANZ celebrants typically offer Registry ceremonies in addition to their personalised ceremony work in the context of their overall professional celebrant practice. They are not

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[27] substituted, on 1 September 2003, by regulation 3 of the Marriage (Fees) Amendment Regulations 2003 (SR 2003/159).

[28] Matter No.3

[29] Also known as "Registry celebrants."

undertaking a public service in the same way for instance, as a Justice of the Peace or church minister. They pay income tax on all earnings; the $90 received per Registry ceremony is taxable income, (accordingly the net amount earned by a VCANZ celebrant from each Registry ceremony is less than $90.)

The current fee gives the public the impression that a VCANZ celebrant's time and experience is of minimal value. Celebrants report the following:

(a) front-end communication with couples booking a Registry ceremony can be time consuming; sometimes up to two hours' collective "admin" time is spent responding to emails and/or phone calls answering couples' questions about the ceremony, *in addition to providing specific and concise DIA-Celebrants Aotearoa resources.*

(b) extra unplanned time is often incurred on the day of a Registry ceremony if a couple arrives late, or if some of their party arrive inordinately early (e.g. to a Celebrant's home).

(c) the incidence of couples requesting date, time or venue changes - or even cancelling completely - after a booking is confirmed and before the celebrant's fee has been paid, is high. This often occurs at short notice, meaning the celebrant may have declined other paid work in the meantime.

(d) while VCANZ celebrants conduct Registry ceremonies during office hours only (9am - 5pm Monday to Friday), it is common for celebrants to receive emails, text messages and phone calls from Registry couples in the evenings and on weekends. Regularly, couples expect an immediate response. The perception that a VCANZ celebrant is readily available to respond to enquiries outside office hours may stem from this being the case when celebrants work with couples on personalised ceremonies - *for which they charge accordingly.*

The circumstances regarding a Registry ceremony venue, and travel to that venue, are markedly different now, compared to when ceremonies only took place in the Registry Office or Courthouse. Some VCANZ celebrants host the ceremony in their home-office, but most will travel to a venue of the couple's choice. The current fee covers the entirety of the VCANZ celebrant's time **and** incidental expenses incurred when providing a Registry ceremony. Those expenses include:

(a) travel time, fuel costs and parking fees (especially in a CBD), which can outweigh the net-income of a Registry ceremony, *even when the limitations and expectations of a Registry ceremony regarding location/distance are met.* This is especially the case in provincial areas where there are few VCANZ celebrants, and couples expect the celebrant to travel to them, rather than vice versa.

(b) although Registry ceremonies are short and transactional, security for the celebrant remains a consideration and some celebrants choose to host couples in a common safe space - for example, a hired office space or Council Hall. This typically incurs a venue fee which is absorbed by the celebrant.

(c) it is common for overseas couples - particularly those from China - to travel to New Zealand for the sole purpose of having a Registry ceremony, without friends or family. In these circumstances the VCANZ celebrant is often asked to provide witnesses. Responding to this request in accordance with BDM guidelines takes time, and on occasion relies upon the goodwill of the Celebrant's colleagues, friends or family to ensure the ceremony can proceed.

The current fee does not reflect the current cost of living, or inflation, in 2023, nor is it in keeping with other representative fees for administrative legal matters[30].

The current fee does not reflect the reallocation of administrative workload from DIA staff (Births Deaths and Marriages) to an individual VCANZ celebrant. From 2024, following solemnisation all marriage details will be electronically entered by the Celebrant for registration with DIA. The fee payable to the celebrant needs to reflect this additional compulsory administrative task.

Taking into account the above factors, it is submitted that Schedule 3 of The Marriage (Fees) Regulations 1995 should be amended as follows:

The fee payable for *every notice of a marriage and solemnisation of marriage by a VCANZ celebrant* [or "Registry Celebrant"] ***is $350.***

It is further submitted that from that sum, the fee payable to the celebrant should be a minimum of **$250**.

[30] For example, the fee payable for probate of a will and letters of administration is $200.

Appendix B: Celebrants Aotearoa – Celebrants Association of New Zealand submission December 2025

5th December 2025

Re: Consultation with the Celebrants Association of New Zealand on the proposal to increase the fee paid to celebrants for registry-style wedding ceremonies

Dear Russell,

Thank you for the continued partnership reflected in the current contract between BDM and Celebrants Aotearoa. Our VCANZ celebrants genuinely value the opportunity to provide registry ceremonies on your behalf, and we are committed to maintaining this service for the benefit of New Zealanders.

We do not believe that the recommended fee of $175 accurately reflects either the true cost or the professional value of the work undertaken by VCANZ celebrants in delivering registry ceremonies.

We respectfully submit that the fee should be grounded in the actual time required and the scope of responsibilities undertaken, compensated at a fair and market-appropriate rate. Using basic hourly principles, as commonly applied to trades and professional services, the realistic cost structure is as follows:

Item	Hours	Celebrant's Venue	Travel to Location
Administration - liaison with couple, printing of documents, follow up emails about location, payment	1.5	135	135
Ceremony time	0.5	45	45
Venue preparation Venue	0.5	45 15	
Business overheads – office, computer and screen, printer, paper and envelopes, ink		10	10
Travel time (30 minutes each way)	1.0	-	90
10 km return x2 at the IRD travel rate of $1.18 per km		-	23.60
Parking costs		-	5
Total Fees *Calculated at $90 / hour – tradesperson min. charge*		$250.00	$308.60

In addition to the direct hours worked, celebrants personally bear a range of required professional and business costs, including:

- VCANZ validation, $200 every four years ($50 p/a)
- Professional development through The Celebrant School, the Celebrants Training College, Celebrants Aotearoa conferences, and external training parties, all of which require personal investment
- ACC levies, which vary depending on income category, with examples being $300 - $600
- CANZ membership, $234 annually

- BDM celebrant renewal fee, $60 annually
- GST obligations for some
- Tax obligations as self-employed contractors

We also note that these costs have increased year on year due to inflation and market adjustments. Additionally, the fee and cost data referenced in our previous submission of October 2023 are now more than two years old and therefore represent a conservative baseline rather than current figures.

We would also like to respond to several points raised in the discussion paper:

a. The notion of "public good" through low-cost registry ceremonies is understood and respected. However, the assumption that demand will materially decrease if fees increase does not appear to be supported by behavioural evidence. In our experience, couples choose registry ceremonies primarily for simplicity and directness of process, not for price alone. The demand for registry ceremonies is not price elastic.

b. The quoted fees of $150 to $300 for basic ceremonies do not reflect an accurate or consistent market picture. Fees vary nationally based on location, experience, seasonal demand, travel burden, and other variables. This range should not be used as a benchmark for determining registry fees.

c. From our submission of October 28, 2023:

We reported that celebrant fees for personal ceremonies range from $300 to $1,000. This variation reflects experience, availability, cost-of-business obligations and market forces. As you are aware, CANZ members are prohibited from fee-setting discussions.

d. The price suppression of registry ceremonies has an impact on the perception and commercial viability of personalised ceremonies. The long-standing $90 registry pricing has contributed to the erosion of personalised-ceremony demand and has repositioned the market perception of celebrancy value downward.

If the registry fee reflected actual cost, approximately $250, it would restore the professional value of celebrancy and enable appropriate market rate pricing for personalised ceremonies.

Further, couples who currently use the registry ceremony as a low-cost legal formality while delegating the social portion of the celebration to a non-celebrant would be less incentivised to do so. A registry rate of $250 or more would still fulfil the "affordable" purpose, while also appropriately signifying the value of a professional celebrant.

e. If DIA wishes to ensure the registry ceremony remains widely accessible for the public, we suggest that an alternative pricing structure could be considered. For example, part of the cost could be reflected in the marriage licence fee, or the licence fee could be moderated while ensuring that celebrants receive a sustainable, market-appropriate payment for their work. This approach would allow the overall cost to remain manageable for couples, while still ensuring that celebrants are fairly compensated for the responsibilities they undertake.

Registry ceremonies can present unexpected emotional, psychological, and interpersonal challenges. While many are straightforward, there are occasions involving interpersonal hostility, distress or complex family dynamics. Celebrants are expected to mitigate and manage these situations professionally and safely, without prior briefing.

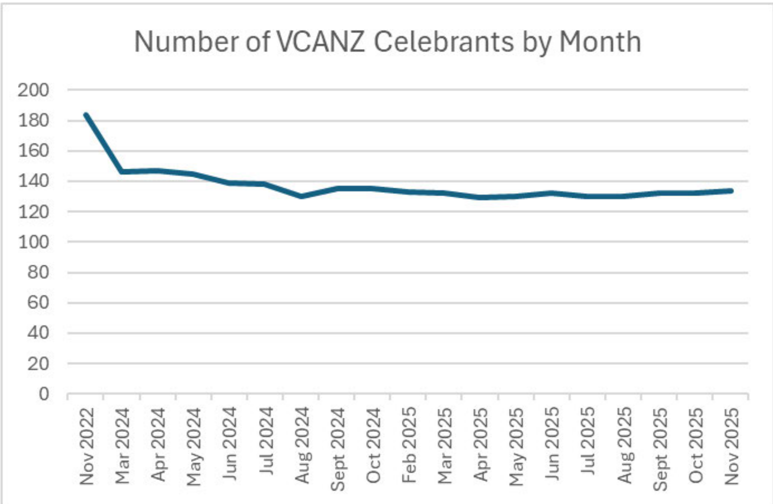
There are legal and statutory duties undertaken by celebrants, including:

- Verifying the identity of each party

- Ensuring the parties are willingly entering the marriage
- Managing health and safety considerations in public or private environments
- Being responsible for their own physical safety, sometimes in private settings with unknown individuals.

Anecdotally, many Celebrants Aotearoa members express willingness to complete VCANZ validation but refrain because the current compensation is insufficient. The $90 fee acts as a disincentive rather than an incentive.

The data below show a gradual, consistent decrease in the number of VCANZ celebrants performing registry ceremonies. This shift aligns with feedback from members who are carefully weighing the time, cost, and personal responsibility required for these ceremonies against the fee received and finding that the current rate does not adequately compensate them. Several celebrants have indicated that they do not intend to renew their VCANZ validation going forward, as the income derived from registry ceremonies no longer justifies the required investment of time, compliance and resources.



In summary, we ***strongly support*** the purpose of the registry ceremony service and wish to continue providing it for the public good. However, we respectfully request recognition that this function is being performed by trained and accountable professionals who carry legal liability, time commitments, personal safety considerations, administrative burden, and increasing business costs.

Based on the actual financial and professional realities outlined in this letter, we advocate increasing the registry celebrant fee to **$250**. We believe this represents a fair and sustainable level of compensation that would maintain celebrant engagement, support service availability for New Zealanders, and properly reflect the value of the work undertaken. We also recommend that there should be an annual CPI increase or at minimum, a review of the fee every two years.

Thank you for your consideration, and we remain committed to working collaboratively toward a sustainable and equitable outcome for BDM, for couples and for celebrants

Kind regards,

Anna Flanagan
President

Celebrants Aotearoa New Zealand

Te Kāhui Ārahi Ritenga o Aotearoa

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