



Department of Land Information  
Government of Western Australia

Information Services Division

Your ref: C2006/2127

Our ref:

Enquiries: Mario Palandri  
08 - 9429 8592

**The General Manager  
Adjudication Branch  
Australian Competition & Consumer Commission  
PO Box 1199  
DICKSON ACT 2602**

FILE No:

DOC:

MARS/PRISM:

Attention: Isabelle Arnaud

Dear Ms Arnaud

**AUSTRALIAN PROPERTY INSTITUTE'S (API) APPLICATION FOR A MINOR VARIATION TO AUTHORISATION A 90545**

Thank you for requesting my views on this matter.

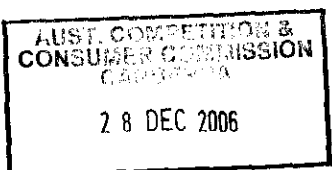
In this State practicing valuers are also controlled by licensing legislation. As such, members of Australian Property Institute (API) in WA have an additional regulatory body of control in the Land Valuer Licensing Act. This satisfies my requirements on the discipline, behaviour and conduct of valuers in employment or in dealings that I may be involved in on behalf of the State of Western Australia.

I have no issue with the additional fine tuning that API has implemented on the Constitution amendments in Clause 9 or the replacement of clauses 28 and 29 in the API's By-laws with the new Section 23: Complaints.

In respect of limiting the appeal process to what appears to be a sufficient and robust process it will work towards containing the costs of these disciplinarily and investigative processes and may prevent them from flowing to a taxpayer funded public court process.

The proposals appear to be of public benefit both to the taxpayer and clients of the profession containing; costs, fees and flow-on to taxpayers especially in other Australian states that do not have a formal licensing process.

The amendments proposed by the Australian Property Institute regarding this application for a minor variation are therefore supported.



Please do not hesitate to contact me directly should you require clarification of any of the comments made in my response or if you require further comments on new issues that may arise in respect of this request.

Yours faithfully

  
**Gary Fenner**  
**VALUER GENERAL**

18 December 2006