



FILE No:
DOC:
MARS/PRISM:

Your ref: C2007/1760
Our ref: VS 03779-2006
Enquiries: Gary Fenner

10 October 2007

Isabelle Arnaud
Director, Adjudication
Australian Competition and
Consumer Commission
GPO Box 3131
CANBERRA ACT 2601

Dear Ms Arnaud

RE: AUSTRALIAN PROPERTY INSTITUTE (API) APPLICATION FOR MINOR VARIATION TO AUTHORISATION A 90545.

Thank you for your referral for my comments of this application to you by the API.

Authorisation A90545 has previously been varied on two separate occasions since the initial approved version in 1994. On both those occasions the Valuer General of WA has had no issue with the proposal or the approval of changes by the ACCC.

My comments relating to each are:

- (1) Changes to the API's disciplinary rules – no issues with this.
- (2) Changes to permit a new Provisional Membership Class, including restricted rights as to the signing of valuations. This inclusion will protect the public inasmuch as where required it will control unqualified valuers like students from preparing and carrying out unsupervised valuations. This should ensure appropriate governance and training to assist the profession without reducing resources, especially at this time when there exists a general shortage of qualified members of the valuation profession due to overall demand from the property development and finance areas in Australia.

This will allow the flow of valuation work to continue to benefit the public while ensuring such work does not continue unsupervised and is carried out in a professional manner.

- (3) The third change is to the constitution's "privileges" section and is understood to only clarify its current meaning, there is no issue with this.

Should you require further comments, please do not hesitate to contact me directly or my Manager of Regulation Mr Mario Palandri on Mario.palandri@landgate.wa.gov.au

Yours sincerely


Gary Fenner
VALUER GENERAL
LANDGATE

10-10-07.



Western Australian Land Information Authority ABN 86 574 793 858
1 Midland Square, Midland, Western Australia 6056
Postal Address: PO Box 2222, Midland, Western Australia 6936
Telephone (08) 9273 7373 TTY (08) 9273 7571 www.landgate.wa.gov.au