Review of the Occupational Regulation of Valuers: Discussion document dated 1st July 2014 Submission to Land Information New Zealand (LINZRegulatorysubmission@linz.govt.nz)

Q1 Do you agree that there is a lack of accountability and transparency in relation to the VRB's operations?

A1 No for accountability but potentially transparency good be improved.

Q2 Do you agree that the composition of the Valuers Registration Board is problematic? If so, how?

A2 I am not aware how the Board is set or how appointments are made

Q3 Do you agree with the proposal to constitute a new board which would include lay people with specialist expertise?

A3 No. Valuation is too specialised

Q4 Do you agree that it should not be mandatory for registered valuers to join NZIV or any other professional association?

A4 No

Q5 What if any issues do you think would need to be managed if professional association membership was voluntary?

A5 Lack of control, lack of funding

Q6 Do you think that a tiered complaints system could deliver the benefits outlined above? If not, why not and do you have any thoughts on how else those benefits might be realised?

A6 Yes possibly.

Q7 Do you think it is possible to reduce the reliance on check valuations and, if so, how might this be done?

A7 No

Q8 Is the range of sanctions proposed above adequate? If not, what other sanctions would be appropriate?

A8

Q9 Is there a need for compliance monitoring and if so by whom?

A9 Yes such as the PINZ Quality Assurance System (QAS) has an inbuilt monitoring process but not all firms are part of this.

Q10 Do you agree with the proposal for the VRB to undertake more analysis of complaints and outcomes? Why/why not?

A10 Yes, Analysis and publication would be beneficial

Q11 Do you agree that "registered valuer" should be the only protected title? Why/why not?

A11 Yes. It provides a clear definition of professionalism and quality. Other titles are more easily obtained and have less relevance.

Q12 Do you think it is necessary or desirable to change the existing registration period and/or registration renewal requirements? Why/why not?

A12 Yes, a better link required between Annual Practising Certificate and CPD compliance should be introduced.

Q13 If you have answered "yes" to the above question, please indicate whether you prefer one or other of the suggested approaches or another approach.

A13 You should not be able to retain APC without CPD requirements

Q14 Should CPD be mandatory? Why/why not?

A14 Yes. Otherwise after registration there is no onus to keep up to date with current practices, codes

Q15 Do you agree with the proposal for setting practice standards? Why/why not?

A15 Giving VRB the ultimate responsibility of approving practice standards is another layer of responsibility that will incur an administrative cost. The creation of multiple valuers Institutes will exacerbate the problem.

Q16 Do you agree with the proposal for setting ethical standards? Why/why not?

A16 Agree with proposal for setting ethical standards but there should be greater emphasis and provision for valuers to raise issues with governing body when a practising member is known or appears to be behaving unethically, or incompetently.

Q17 Do you agree that the minimum age requirement should be removed?

A17 Yes. Effectively irrelevant given the time requirements to become registered. I.e. Education and Valuation experience (6 years approx minimum)

Q18 What do you consider are the benefits and costs of implementing any or all of the proposals?

A18 More streamline and cost effective

Q19 Do you think there are any aspects of the current occupational regulation scheme for valuers that impede competition in the supply of valuation services? Please specify which aspects and how they impede competition.

A19 I am not aware of any

Q20 Do you think the occupational regulation of valuers should be liberalised? If so, what aspects of the scheme should be liberalised and what benefits would this have?

A20 No

Q21 Do you think the three year supervised experience period for New Zealand graduates is too long? If so, how long should the experience period be?

A21 No, three years its barely long enough to have a full understanding. I am not aware of any graduates who have been confident enough after just 3 years to apply for registration immediately. (I was 4 years)

Q22 Do you favour a tiered registration system that provides for provisional registration (with less experience and other requirements) as well as full registration?

A22 No

Q23 Should the requirement for overseas valuers to have at least one year's practical experience in New Zealand be retained?

A23 Yes

Q24 Do the existing degree courses and post-graduate training requirements provide registered valuers with the expertise required to do sum insured valuations?

A24 No

Q25 Is there a need for practice standards covering sum insured valuations?

A25 Yes

Q26 Could registration requirements be reduced for some types of valuation?

A26 No, can only see complications

Q27 Are the current registration requirements excessive for valuers who only carry out residential valuations? What would be the risks and benefits to consumers if the requirements were reduced?

A27 No, cannot see any benefits to the consumers but can see more risk and the Valuer make not have a complete knowledge base.

Q28 Are there are any risks in allowing registered valuers who have not passed degree courses in valuation to do rural valuations?

A28 Yes, they are very specialised

Q29 Are the valuation qualifications offered by the accredited universities fit for specialist purposes? If not, what are the problem areas?

A29 No, only a very brief period is spent on some specialist types of values. I.e. Hotels was 1 or 2 lectures from memory.

Q30 Do you think any changes are required to the existing professional indemnity insurance arrangements?

A30 No

Q31 If so, do you favour either of the options outlined above or have an alternative suggestion?

A31 n/a