

NAAB
NATIONAL ARCHIVAL APPRAISAL BOARD



CNÉA
CONSEIL NATIONAL D'ÉVALUATION DES ARCHIVES

National Archival Appraisal Board
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The Honourable Pablo Rodríguez
Minister of Canadian Heritage
House of Commons
Ottawa, Ontario
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Dear Minister Rodríguez,

On behalf of the National Archival Appraisal Board (NAAB), we are writing you about the recent changes made by the Canadian Cultural Property Export Review Board (CCPERB) in December 2020 to its Guide for Monetary Appraisals. This Guide was accompanied by a *Communication for Archival Stakeholders* which attempts to justify CCPERB's requirements for determining the Fair Market Value of archival fonds.

NAAB has long been the coordinating body for appraisal services for the archival community in Canada and as such we would like to bring to your attention the attached document, *Challenging CCPERB*, that provides a detailed response and analysis of the arguments put forward in CCPERB's *Communication*. It is NAAB's contention that the revised Guide undermines the forty plus years of precedents that have constituted the basis of monetary appraisal practices within the archival community. In addition, the requirement to provide recent sales transactions as the sole methodology for the appraisal of archival materials is prohibitive because of the unique qualities and long-term historical and research value of archives. Sales precedents are far less likely to exist for archival materials pertaining to a wide range of nationally important figures from all aspects of our society, including those from racialized populations, women, and creative trailblazers.

NAAB questions the applicability of the jurisprudence outlined by CCPERB as it does not adequately speak to, nor articulate, its relevance to the appraisal of archival fonds. NAAB also questions the narrow and legalistic interpretation of fair market value that CCPERB has now adopted and imposed on all monetary appraisals. Consequently, CCPERB's new *Guide* seemingly contravenes the very intentions of the Cultural Property Export and Import Act which was adopted by Parliament to encourage all types of potential donors to donate their archival fonds to designated heritage institutions. The restrictions now adopted by CCPERB for the monetary appraisal of archival records will logically prevent donors from benefitting from any financial incentives associated with certification, despite their efforts to preserve Canada's documentary heritage.

As it currently exists, CCPERB's revised *Guide* means that Canadian archives, and other keepers of our documentary heritage, will face substantial difficulties in attracting authentic records of outstanding significance that reflect the extraordinary lives, activities and circumstances of Canadians.

We hope that the attached document will help to clarify the issues and concerns we have with CCPERB's *Communication to Archival Stakeholders*.

At this critical time, we are hereby requesting:

1. A review of CCPERB's revised Guide and its interpretation of fair market value, to provide a reasonable readjustment of its procedures that acknowledges the specific nature of archival materials; and the resulting need to use other methodologies as appropriate for the monetary appraisal of archival records.
2. Reconsideration of the composition of the CCPERB to include appointment of two (2) seasoned archivists who have expertise in both monetary appraisal and negotiating the acquisition of multi-media (including digital) archival funds.

As we move forward in the best interest of Canadians, NAAB welcomes the opportunity to work together with you to ensure the ongoing donation of Canada's documentary heritage from private hands to public collections.

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Karen Teeple, Chair
NAAB Board of Directors