

Sharilyn Ingram, Chair  
Canadian Cultural Property Export Review Board  
Administrative Tribunals Support Service of Canada  
344 Slater Street, 15<sup>th</sup> Floor, Suite 400  
Ottawa, Ontario K1A 0E2

Dear Ms. Ingram

The National Archival Appraisal Board (NAAB) is pleased to respond to CCPERB's recent consultation on its updated Guide for Monetary Appraisals. NAAB has long been a coordinating body for appraisal services for the archival community, and for archival applications submitted to CCPERB. More recently, as a result of a restructuring, NAAB has developed a number of initiatives and priorities to address issues around the appraisal process. This is a positive step forward in making NAAB a more robust organization and a centre of excellence for monetary appraisal in Canada. Therefore it came as no surprise that these 'draft' guidelines triggered considerable reaction from both monetary appraisers and the archival community.

The main sticking point as we see it, is the narrow interpretation of fair market value as it pertains to the Canadian Cultural Property Export and Import Act. Without more flexibility in the application of fair market value, the certification of archival material is seriously compromised. We have a shared interest in ensuring that this doesn't happen and hope that we can continue to work together to resolve those issues that are highlighted in our submission.

NAAB recognizes the challenge of integrating market values in the monetary assessment of certified archival property. To this end, NAAB, in conjunction with the Canadian Council of Archives, will soon be introducing the Database of Archival Values (DAV), to the archival community. This database is intended to capture sales precedents of archival material and will be populated by subscribing institutions that have purchased various items. In time it will become a useful tool for appraisers to reference in their appraisals and for institutions wanting to conduct internal appraisals. However because there is a very limited market for whole archival fonds, any sales precedents in the database that may be relevant, will have to be used in conjunction with other acceptable methodologies.

The attached submission is based, for the most part, on feedback we received from a survey that NAAB distributed to the archival community in relation to the proposed guidelines. The summary data from this survey is detailed and lengthy so we only highlighted what we felt to be the more serious concerns. If you are interested in seeing the complete summary data, please let us know and we would be happy to provide you with a copy.

We look forward to working with you and members of the Board in creating a guide that is more applicable in determining the fair market value of archival material.

Respectfully submitted,

Karen Teeple, Chair  
NAAB Board of Directors