I wish to express the incongruity of APRA not accepting a SM Super Fund's investment property valuation - as valued annually by each State Govt's Valuer General - instead of insisting on a seperate valuation...adding considerable cost to a fund every 3 years? This is a financial impost most funds could do without.

The Valuer Generals' valuations are used to raise state taxes but the're not good enough for APRA? This incongruity needs removal as it doesn't make any sense at all and is costing Funds unnecessary money.

The argument that VG valuations are "low" doesn't hold water as there is no "property tax" as such applied to the investment by APRA. If they, did they would have to use the VG valuation anyway or face countless legal challenges as there would be 2 different taxation levels on the same property.

Michael Pemberton