

Alberta Investment Management
Allied Irish Banks, p.l.c.
Allied Properties REIT
Artis REIT
Aspen Properties Ltd.
Bentall LP
BMO Capital Markets Real Estate Group
Boardwalk REIT
Brookfield Financial Real Estate Group
Brookfield Real Estate Opportunity Fund
Cadillac Fairview Corporation Ltd., The
Calloway REIT
Canderel
CAPREIT
CB Richard Ellis Limited
Charter REIT
Chartwell Seniors Housing REIT
CIBC Commercial Mortgages Inc.
CIBC World Markets Inc.
Colliers International, Inc.
Cominar REIT
CREIT
Crombie REIT
Cushman & Wakefield Inc.
Dundee REIT
ECL Developments Limited
EPIC Realty Partners Inc.
Fengate Capital Management Ltd.
First Capital Realty Inc.
First National Financial LP
Grosvenor Americas Limited
GWL Realty Advisors Inc.
H & R REIT
Homestead Land Holdings Limited
IGRI Inc.
ING Real Estate Canada
InnVest REIT
Ivanhoe Cambridge
Killam Properties Inc.
M3 Capital Partners
Macquarie Capital Markets Canada, Ltd.
Manulife Financial
Melcor Developments Ltd.
Menkes Development Ltd.
MI Developments Inc.
Minto Group, The
Morguard Corporation
Morguard Investments Limited
Morguard REIT
Mortgage Fund Three
National Bank Financial Inc.
Northern Property REIT
NorthWest Healthcare Properties REIT
Ontario Realty Corporation
OP Trust
Oxford Properties Group Inc.
Parkridge Lifestyle Communities Inc.
Platinum Equities Inc.
Presima
Primaris Retail REIT
Public Storage Canadian Properties
RBC Capital Markets Real Estate Group
Redcliff Realty Advisors Inc.
Retrocom Mid-Market REIT
RioCan REIT
Scotia Capital Inc.
Scotiabank
Scott's REIT
SilverBirch Hotels & Resorts
SITQ
Sun Life Assurance Company of Canada
TD Securities Inc.
Timbercreek Asset Management Inc.
Whiterock REIT

Kwab Ako-Adjei
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Minister of Consumer Services
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Canada M7A 1L2

May 12th, 2010

Dear Mr. Ako-Adjei

Thank you for taking the time to meet with us today regarding our concerns with the Real Estate and Business Brokers Act, 2002 (REBBA). This is an issue that REALpac and its member companies have been following for some time and we continue to support changes that are more favourable to commercial real estate.

REALpac has had communications with officials from the Minister of Consumer Services office over several years and we are appreciative of the ongoing working relationship we are able to maintain; we feel that it is imperative to keep open and constructive lines of communications with government officials.

Our members are still anxious that REBBA be reformed to account for commercial reality. We hope our meeting and list of proposed changes can re-spark dialogue between REALpac and the Ministry of Consumer Services. Consistent with our longstanding position, REALpac recommends that the following changes be made to REBBA:

- An Exemption for Regulated and Large Institutions Having an Ownership Stake
- Allowing the Use of Property Management Software
- An Exemption for Large Transactions
- On-Line Trading Systems Shall Not Constitute an Activity "in furtherance to a trade"
- No Advance Consent Required for the Appointment of Directors and Officers of Large Commercial Owner
- Removal of Unnecessary Courses & Training
- Equivalent Training and Accreditation -Ontario should provide accreditation for pre-license education and waive the basic experience requirement for brokers when there is evidence of related work experience. Also, individuals who have surrendered licenses should be allowed to re-acquire them without further requirements.

REALpac would like to recognize the efforts of the Ministry through our appreciation for changes that have been made to REBBA in the past. Please feel free to contact me at your earliest convenience at mbrooks@realpac.ca or 416-642-2700 ext. 225, should you have any questions or comments.

Regards,



Michael Brooks
Chief Executive Officer



Ryan J. Eickmeier
Manager, Government Relations & Policy