

INDEX

Note: References are to sections of the *Income Tax Act*. “Reg.” references are to the *Income Tax Regulations*. “Reg. Sch. II:Cl.” are references to the capital cost allowance Classes in Schedule II of the *Income Tax Regulations*, reproduced at the end of the *Regulations*. “ITAR” references are to the *Income Tax Application Rules*, reproduced after the text of the *Income Tax Act*.

A

AAII, *see* Adjusted aggregate investment income

ABIL, *see* Allowable business investment loss

ACB, *see* Adjusted cost base

ACB reduction

- defined, for small business investment capital gain rollover, 44.1(1)

ADR, *see* American Depositary Receipt

AFB, *see* Authorized foreign bank

AIP, *see* Accelerated investment incentive property

AIP, *see* Accumulated income payment

ALDA, *see* Advanced life deferred annuity

ALDA dollar limit

- defined, 205(1)

AML/KYC procedures

- defined, for Common Reporting Standard, 270(1)“anti-money laundering and know your customer procedures”

AMT (Alternative Minimum Tax), *see* Minimum tax

APA, *see* Advance Pricing Agreement

ASPA, *see* Adjusted stub period accrual

ATI, *see* Adjusted taxable income

ATIP (Access to information and privacy), 241(1) (Notes)

AVC, *see* Additional voluntary contribution (AVC) [to pension plan]

Abatement of tax

- corporations, 124(1)
- manufacturing and processing credit, 125.1
- small business deduction, 125
- individuals, re provincial schooling allowance, 120(2), Reg. 6401

Abeyance letter, 225.1(5)

Aboriginal government

- defined, re disclosure of taxpayer information, 241(10)

Aboriginal peoples, *see* Indian

Absconding taxpayer, 226

Absorbed capacity

- defined, for interest deduction restrictions, 18.2(1), 248(1)
- reduces limitation on interest expense, 18.2(2)E

Absorbed capacity year

- defined, 18.2(1)“cumulative unused excess capacity”(b)(ii)

Absorptive merger of foreign corporations

- qualifies as foreign merger, 87(8.2)

Accelerated Canadian development expense

- deduction for, 66.2(2)(d)
- defined, 66.2(5)

Accelerated Canadian oil and gas property expense

- deduction for, 66.4(2)(c)
- defined, 66.4(5)

Accelerated investment incentive property

- defined, Reg. 1104(4)
- fast writeoff, Reg. 1100(2)A
- Canadian vessel, Reg. 1100(1)(v)(iv)(A)
- Class 13, Reg. 1100(1)(b)(i)(A)
- Class 14, Reg. 1100(1)(c)(i)(B)
- Class 43 (after 2025), Reg. 1100(2)A(d)

- Class 43.1, Reg. 1100(2)A(b)

- Class 43.2, Reg. 1100(2)A(c)

- Class 53, Reg. 1100(2)A(d)

Acceleration clause exercised by creditor, 20(1)(n)

Acceptable accounting standards

- defined, 18.21(1)

Access road

- access rights to, 13(7.5)(c)
- forest, Reg. Sch. II:Cl. 10(p)

Access to information, 241(1) (Notes)

Accident claims, *see also* Accident insurance plan

- motor vehicle, payments exempt, 81(1)(q), Reg. 6501

Accident insurance plan

- death coverage is not group life insurance, Reg. 2700(2)
- employer’s contribution not a taxable benefit, 6(1)(a)(i)
- payment to employee under, taxable, 6(1)(f), ITAR 19

Account holder

- defined, for Common Reporting Standard, 270(1)

Accountant, *see also* Professional practice

- examination fees to qualify as, tuition credit, 118.5(1)(d)
- penalty for misrepresentation by, 163.2

Accounting

- accrual method for professionals until 2017, 34
- transitional rule 2017–2020, 10(14.1)
- branch
- insurer, by, 138(9)
- cash method for farming or fishing business, 28(1)–(3)
- consolidation method prohibited, 61.3(1)(b)C(i), 248(24)
- equity method prohibited, 61.3(1)(b)C(i), 248(24)
- functional currency reporting, 261
- records, not protected by solicitor-client privilege, 232(1)“solicitor-client privilege”
- rule changes for financial institutions
- transitional rules
- life insurers, 138(16)–(25)
- non-life insurers, 12.5, 20.4
- other financial institutions, 142.51
- securities held by financial institutions, 142.2–142.6

Accounts

- contingent, limitation on deductibility, 18(1)(e)
- factoring of, *see* Factoring of accounts
- penalty for failure to keep, 238(1), 239(1)(b)
- receivable, *see* Accounts receivable
- separate, for tax deductions
- penalty for default, 238(1)
- tax, transfers of payments among, 211.2
- to be kept, 230(1)

Accounts receivable

- bad, *see* Bad debt
- ceasing to carry on business, on, 28(5)
- doubtful, reserve for, 12(1)(d), 20(1)(l)
- factoring of, *see* Factoring of accounts
- sale of, 22

Accredited film or video production certificate, 125.5(1)

Accredited production

- defined, for film/video production services credit, 125.5(1), Reg. 9300

Accrual method of reporting income

- required generally, 9(1)
- • exception for farmers and fishers, 28
- • mark-to-market requirement for financial institutions, 142.5(2)
- • work in progress deferral for professionals until 2017, 34
- • • transitional rule 2017–2020, 10(14.1)

Accrued interest, *see* Interest (monetary): accrued

Accrued return (from specified debt obligation)

- defined, Reg. 9102(1), (3)

Accumulated income payment, *see* Registered education savings plan: accumulated income payment

Accumulated 1968 deficit

- defined, 219(7)

Accumulated overpayment amount

- defined, for corporate interest offset, 161.1(1)

Accumulated PSPA

- defined, Reg. 8303(1)(a), 8303(2)

Accumulated underpayment amount

- defined, for corporate interest offset, 161.1(1)

Accumulating fund

- computation of, Reg. 307
- defined, Reg. 307

Accumulating income (of trust)

- defined, 108(1)
- election re, *see* Preferred beneficiary: election

Accumulation of property

- by registered charity, 149.1(8), (9)

Acquired affiliate

- defined, for FAPI blocking-deficit rules, Reg. 5905(7.1)(a)

Acquired for consideration

- meaning of, 108(7)

Acquiror (re butterfly transactions)

- defined, 55(1)“permitted exchange”(b)

Acquisition of control, *see* Control of corporation: change of

Act, *see also* Legislation

- defined, *Interpretation Act* s. 35(1)

Acting services, *see* Actor

Action, *see also* Offences

- defined, 222(1)
- none for withholding taxes, 227(1)
- recovery of tax by Crown, for, 222(2)

Active asset

- defined, 125(7)

Active Biotech spinoff, Reg. 5600(a)

Active business, *see also* Small business deduction

- corporation, *see* Active business corporation
- defined, 95(1), 125(7)“active business carried on by a corporation”, 125(7)“income of the corporation for the year from an active business”, 248(1), Reg. 5907(1)
- income from
 - • defined, 95(1), 125(7)“income of the corporation for the year from an active business”
 - • foreign affiliates, 95(1), 95(2)(a)
 - • investment income from associated corporation, deemed to be, 129(6)
- income incident or pertaining to, 129(4)“income” or “loss”(b)(ii)

Active business corporation

- defined, for small business investment capital gain rollover, 44.1(1), (10)

Active member

- defined, Reg. 8306(4)(a), 8500(1)

Active NFE

- defined, for Common Reporting Standard, 270(1)

Active partner, *see* Partner

Active trade or business

- exception to limitation-on-benefits rule, Canada-U.S. Tax Treaty:Art. XXIX:3

Actor

- deduction from employment income, 8(1)(q)
- non-resident
 - • deferred payment by actor’s corporation, 115(2.2)
 - • election to be taxed under Part I, 216.1
 - • income excluded from Part I unless election filed, 115(2.1)
 - • information return, Reg. 202(1.1)
 - • tax return not required unless election filed, 150(1)(a)(i)(B)
 - • withholding tax on acting services, 212(5.1)–(5.3)

Actor payment, defined, 212(5.2)

Actual stub period accrual (corporate inclusion of partnership income shortfall)

- adjustment if different than amount reported, 34.3(1)“income shortfall adjustment”, 34.3(3)
- defined, 34.3(1)

Actuarial report, for registered pension plan, 147.2(3), Reg. 8410

Actuarial surplus

- no transfer from RPP on death, 147.3(7)(a)
- no transfer to money-purchase RPP, RRSP or RRIF, 147.3(4)(a)
- no transfer to spouse on marriage breakdown, 147.3(5)(a)
- transfer of, 147.3(4.1)

Actuary

- defined
 - • for employee life and health trusts, 144.1(1)
 - • for registered pension plans, 147.1(1)

Additional tax

- clawback of OAS, 180.2
- income not earned in a province, 120(1)
- • minimum tax and, 120(4)“tax otherwise payable under this Part”
- non-Canadian corporations carrying on business in Canada, 219
 - • limitations on, 219.2
- surtax, *see* Surtax

Additional voluntary contribution (AVC) [to pension plan]

- defined, 248(1)
- past service, undeducted
- • refund, 60.2(1)

Address

- changing, deduction for costs, 62(3)(h)

Adjusted aggregate investment income

- defined, 125(7)

Adjusted business income

- application in calculation of M&P credit, Reg. 5200, 5201
- defined, 125.2(1), Reg. 5202, 5203(1)

Adjusted cost base, *see also* Property

- bond or debt obligation, 53(1)(g), (g.1), 53(2)(l), (l.1), (q)
- computing
 - • amounts to be added, 53(1)
 - • amounts to be deducted, 53(2)
 - • reduction for assistance received, 53(2)(k)
 - • reduction on debt forgiveness, 53(2)(g.1), 80(9)–(11)
- debts
 - • owing by predecessor corporation, 87(6), (6.1), (7); ITAR 26(23)
- defined, 54
- excessive election for capital gains exemption, 53(2)(v)
- expropriation asset, 53(1)(k), 53(2)(n)
- farmland, 53(1)(i)
- flow-through entity, 53(1)(p)
- identical properties, 47(1)(c), (d); ITAR 26(8)
- indexed debt obligation, 53(1)(g.1), 53(2)(l.1)
- land, 53(1)(h), (i)

- Adjusted cost base** (*cont'd*)
- negative, deemed gain, 40(3), (3.1)
 - offshore investment fund property, 53(1)(m)
 - option, of, 53(2)(g.1)
 - reduction flowed through to share, partnership interest or trust interest, 49(3.01)
 - to acquire share of predecessor, reduction on amalgamation, 87(5.1)
 - partnership interest, 40(3.1), 53(1)(e), 53(2)(c), (g.1); ITAR 26(9)
 - partnership property, right to receive, 53(2)(o)
 - property owned since before 1972, ITAR 26(3)
 - shares, 53(1)(b), (c), (d), (d.3), (f.2), (j), 53(2)(a), (b), (e), (f.1), (g.1)
 - right to acquire by deceased's estate under employee stock option agreement, 53(2)(t)
 - substituted property, 53(1)(f)
 - surveying costs, 53(1)(n)
 - trust interest, 53(1)(d.1), (d.2), (l), 53(2)(b.1), (g.1), (h), (i), (j), (q)
 - valuation costs, 53(1)(n)
- Adjusted cost basis, defined**, 148(9)
- Adjusted cumulative foreign resource expense**
- defined, 66.21(1)
- Adjusted income**
- defined
 - for Canada Child Benefit, 122.6
 - for Canada Disability Savings Grant, *CDS Act*, s. 2(2) (in Notes to 146.4)
 - for Canada Education Savings Grant, *CES Act*, s. 2(2) (in Notes to 146.1)
 - for GST credit, 122.5(1)
 - for old age security clawback, 180.2(1)
 - for refundable medical expense credit, 122.51(1), 122.6
- Adjusted principal amount, defined**, 80.1(7)
- property disposed of at other than arm's length, ITAR 26(5)
 - property owned on Dec. 31/71, ITAR 26(3), (4)
- Adjusted purchase price**
- of interest in annuity contract, defined, Reg. 300(3), (4), 310
- Adjusted selling cost (re investment tax credits)**
- defined, 127(11.7)
 - effect on qualified expenditures, 127(11.6)(d)(ii)
- Adjusted service cost (re investment tax credits)**
- defined, 127(11.7)
 - effect on qualified expenditures, 127(11.6)(c)(ii)
- Adjusted stub period accrual (corporate inclusion of partnership income)**
- deduction in year following inclusion, 34.2(4)
 - defined, 34.2(1)
 - included in corporation's income, 34.2(2)
 - inclusion for new partner, 34.2(3)
 - optional reduction in income inclusion, 34.2(1)"adjusted stub period accrual"(a)F
 - reserve for qualifying transitional income, 34.2(11)
- Adjusted taxable income**
- defined
 - for Alternative Minimum Tax, 127.52
 - for GRIP calculation, 89(1)
 - for interest deduction restrictions, 18.2(1)
 - interest expense limited to 30% of, for certain corps, 18.2(2)B(b)
- Adjustment**
- at-risk, *see* At-risk adjustment (for tax shelter)
 - capital setoff, *see* Transfer pricing capital setoff adjustment
 - income setoff, *see* Transfer pricing income setoff adjustment
 - inflation, for, *see* Indexing (for inflation)
 - inventory, *see* Inventory: adjustment
 - unpaid claims reserve, 20(4.2)
- Adjustment amount**
- defined, for FAPI surplus rules, Reg. 5905(7.7)
- Adjustment time**
- defined, for FAPI surplus rules, Reg. 5905(7.2)
- Administration fee**
- paid to non-resident, 212(1)(a)
 - defined, 212(4)
- Administration of Act, 220–244**
- Administrator, *see also* Legal representative**
- deemed to be legal representative, 248(1)"legal representative"
 - defined
 - for government-sponsored retirement arrangements, Reg. 8308.4(1)
 - for pooled registered pension plan, 147.5(1)
 - estate, *see* Executor
 - obligations of, 159
 - registered pension plan, *see* Registered pension plan: administrator
 - return required by, 150(3)
- Adoption expenses**
- tax credit, 118.01
- Adoption period**
- defined, 118.01(1)
- Adult basic education**
- deduction for financial assistance, 110(1)(g)
- Advance Pricing Agreement**
- transfer pricing, 247
- Advanced life deferred annuity, 146.5**
- cumulative excess amount, tax on, 205
 - death benefit, taxable, 146.5(3)
 - rollover to RRSP etc. of spouse, child or grandchild, 60(1)(v)(A.2)
 - defined, 146.5(1), 248(1)
 - dollar limit, defined, 205(1)"ALDA dollar limit"
 - excessive transfer to, tax on, 205
 - non-resident withholding tax, 212(1)(l.1)
 - payments from
 - included in income, 56(1)(z.5), 146.5(2)
 - not taxed as regular annuity payments, 56(1)(d)(iv)
 - withholding of tax at source
 - non-resident payee, 212(1)(l.1)
 - resident payee, 153(1)(u)
 - qualified investment for RRIF, 146.3(1)"qualified investment"(b.3)
 - qualified investment for RRSP, 146(1)"qualified investment"(c.3)
 - transfer from
 - to RRIF, 146.3(2)(c)(ix)
 - to RRSP, 146(16)(a.1)
 - transfer to
 - from DPSP, 147(19)(d)(v)
 - from PRPP, 147.5(21)(c)(vi)
 - from RPP, 147.3(1)(c)(iv)
 - from RRIF, 146.3(14.1)(c)
 - from RRSP, 146.3(16)(a.1)
 - withholding tax, *see* payments from (above)
- Advantage**
- charitable donation or political contribution
 - defined, 248(32)
 - reduces eligible amount for donation or contribution credit, 248(31)
 - RCA
 - defined, 207.5(1)
 - limitation on RCA election, 207.5(3)
 - tax on, 207.62
 - RRSP, RRIF, TFSA, RESP or RDSP
 - defined, 207.01(1)
 - tax on, 207.05

Adventure in the nature of trade

- constitutes business, 248(1)“business”
- deemed carried on by corporation or trust, 10(11)
- inventory held in, no writedown until sale, 10(1.01), (9), (10)
- superficial loss not deductible, 18(14)–(16)

Advertisement directed at the Canadian market

- defined, 19.01(1)

Advertising

- expenses, limitation on deductibility
- foreign broadcasting media, 19.1
- foreign (other than U.S.) periodicals, 19
- materials
- deemed to be inventory, 10(5)
- valuation of, 10(4)
- show, ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(ix)
- show, ineligible for film/video production services credit, Reg. 9300(2)(i)
- signs and posters, capital cost allowance, Reg. Sch. II:Cl. 11

Advisor

- defined
- for notifiable-transaction rules, 237.4(1)
- for reportable-transaction rules, 237.3(1)

Advisory committee, dues paid by employee, deduction,
8(1)(i)(vi)**Advocate (in Quebec), see Lawyer****Aeronautics Act, compensation under, exemption,** 81(1)(d)**Aeroplane, see Aircraft****Affiliate, see Affiliated person; Foreign affiliate; Subsidiary****Affiliate share**

- defined, 93(2)(a), (b), 93(2.1)(a), (b), 93(2.2)(a), (b), 93(2.3)(a), (b)

Affiliate year

- defined, for artificial foreign tax credit generator rules, 91(4.1)

Affiliated

- defined
- changed meaning for trust loss trading rules, 251.2(5)

Affiliated counterparty

- defined, for synthetic equity arrangement rules, 112(2.32)(a)

Affiliated person

- acquisition of capital property by, 40(3.3), (3.4)
- acquisition of depreciable property by, 13(21.2)
- acquisition of inventory by
- previously held as adventure in nature of trade, 18(14)–(16)
- previously held by financial institution, 18(13), (15)
- defined, 251.1

Affiliated specified counterparty

- defined, for synthetic equity arrangement rules, 112(2.32)(b)(ii)(A)(II)

African Development Bank

- bonds of, qualified investment for RRSP etc., 204“qualified investment”(c.1) (formerly Reg. 4900(1)(I)(vi))

Age

- 6
- under
- Canada Child Benefit enhanced, 122.61(1)A:E(a)
- 7
- under
- child care expenses, 63(3)“annual child care expense amount”(b)(i)
- 16
- under
- child care expenses, 63(3)“eligible child”(c)
- tuition credit disallowed, 118.5(1)(a)(ii.2)(A)
- 18
- over
- RRSP overcontribution of \$2,000 allowed, 204.2(1.1)(b)C

- where income-splitting tax does not apply, 120.4(1)“excluded amount”(e), (f)
- under, *see* Child; Minor
- 19
- over, GST credit, 122.5(1)“eligible individual”(b)
- under
- dependant for pension purposes, Reg. 8500(1)“dependant”(a)
- dependent child, 70(10)“child”(c), 252(1)(b)
- parent or caregiver to be notified of RESP, 146.1(2)(1)
- 21
- over
- accumulated income payments from RESP, 146.1(2)(d.1)(iii)(A)
- under
- contributions to RESP, 146.1(2)(j)(ii)(A), (iii)(A)
- dependent child, ITAR 20(1.11)(c), 26(20)(c)
- income from personal injury award exempt, 81(1)(g.1), (g.2), 81(5)
- transfer of RESP beneficiary, 204.9(4)(b), 204.9(5)(c)(ii)
- trust for, whether amounts payable, 104(18)(b)
- 25
- over
- where income-splitting tax does not apply, 120.4(1)“excluded amount”(a), (g)
- under
- income-splitting tax
- joint liability with related person, 160(1.2)
- 27
- effect on registered disability savings plan, 146.4(4)(n)(iii)
- 40
- under, trust for, whether amounts payable, 104(18)(d)
- 55
- additional lifetime retirement benefits, Reg. 8505(3)
- early retirement pension benefits, Reg. 8503(3)(c)(i)(A)
- 59
- effect on registered disability savings plan, 146.4(4)(n)(ii), (8)(d)
- 60
- early retirement pension benefits, Reg. 8503(3)(c)(ii)(A)
- pension bridging benefits, Reg. 8503(2)(b)(ii)B(A)
- registered disability savings plan, contributions stop, 146.4(4)(g)(i)
- 65
- over
- home accessibility tax credit, 118.041(1)“qualifying individual”(a)
- in-home care of, caregiver credit (before 2017), 118(1)B(c.1)(iii)(A)
- normalized pension, lifetime retirement benefits, Reg. 8302(3)(b), (n), 8303(5)(b), 8503(2)(e)(vi)B, 8503(3)(d)(ii)B, 8504(10)(b), 8517(5)(b)
- pension bridging benefits, Reg. 8503(2)(b)(i), (ii)A(A), 8506(1)(b)
- pension credit, 118(3)
- re-employment of member of pension plan, Reg. 8503(9)(b)(iv)
- restricted-funding member of pension plan, Reg. 8515(7)(e)(i)
- sale of LSVCC shares, 211.8(1)(a)B(i)(A)
- specified retirement arrangement, Reg. 8308.3(1)(c)
- spouse, income-splitting tax inapplicable, 120.4(1.1)(c)(i)(B)
- trust for self, 248(1)“alter ego trust”
- trust for self and spouse, 248(1)“joint spouse trust”
- under
- pension plan, retirement benefits, Reg. 8504(5)
- 71
- conversion of pension rights to annuity contract, Reg. 8502(e)(i)
- conversion of RRSP to RRIF or annuity, 146(2)(b.4)

Age (*cont'd*)

- • maturation of deferred profit sharing plan, 147(2)(k), 147(10.6)
- • pre-retirement surviving spouse benefits, Reg. 8506(1)(e)(iii)
- • pre-retirement survivor benefits, Reg. 8503(2)(f)(iii)(B)
- 75
- • payments after, annuity contract issued before 1978, 20(2.2)
- 80
- • effect on registered disability savings plan, 146.4(4)(l)B
- 85
- • exempt life insurance policy, Reg. 310“endowment date”(a)(ii)
- 90
- • annuity to, 146(1)“qualified investment”(c.2)(v)(B), 146.3(1)“qualified investment”(b.2)(v)(B)
- 91
- • reaching, prescribed annuity contract, Reg. 304(1)(c)(iv)(C), 304(2)(b)
- 94
- • RRIF payout levels out at 20%, 146.3(1)“minimum amount” under 18, *see* Minor

Agent

- administering property, return by, 150(3)
- insurance, reserves for, 32(1)
- liability for non-resident tax, 215(2)
- paid by commission, deductions allowed, 8(1)(f)
- certificate of employer, 8(10)
- receiving income on behalf of non-resident, 215(1), (3)
- trustee acting as, 104(1), *see also* Bare trust
- ceasing to act, 248(1)“disposition”(b)(v)

Aggregate investment income

- defined, 129(4), 248(1)
- refund to private corporation of 30²/₃%, 129(4)“non-eligible refundable dividend tax on hand”(a)(i)A

Aggregate participating percentage

- defined, for FAPI stub-period rules, 91(1.3)

Agreement

- among associated/related corporations
- • to allocate base level deduction re soft costs on land, 18(2.3)
- • to allocate capital deduction among financial institutions, 190.15(2)
- • to allocate dividend allowance for Part VI.1 tax, 191.1(3)
- • to allocate ITC expenditure limit, 127(20)
- • to allocate reduction in ITC due to government assistance, 127(20)
- • to allocate small business deduction, 125(3)
- • to transfer SR&ED qualified expenditure pool, 127(13)–(17)
- collection agreement with provinces, 228
- competent authority, deemed valid, 115.1
- for payment of unreasonably low rent
- • effect on proceeds of disposition of property, 69(1.2)
- for payment without withholding tax, void, 227(12)
- not to compete, *see* Restrictive covenant (or non-competition payment)
- to issue shares to employee, 7
- to transfer forgiven amount of debt to related person, 80.04

Agreement for sale

- included in proceeds of disposition, 20(5), (5.1)

Agricultural business

- defined, 135.1(1)

Agricultural cooperative corporation

- defined, 135.1(1)
- tax-deferred patronage dividends, 135.1

Agricultural equipment technician

- apprenticeship job creation credit, 127(9)“investment tax credit”

Agricultural land, *see* Farm land**Agricultural organization**

- exemption, 149(1)(e), 149(2)
- information return, whether required, 149

Agri-Quebec programs

- prescribed for farm income stabilization, Reg. 5503

Air Canada

- pension underfunding trust, Reg. 6802(h)(i), 8502(b)(v.1)
- subject to tax, 27(2), Reg. 7100

Air conditioner

- medical expense credit for, Reg. 5700(c.3)

Air navigation equipment

- lease of, non-resident withholding tax exemption, 212(1)(d)(xi)(D)

Air purifier

- medical expense credit for, Reg. 5700(c.1)

Air quality improvement credit, 127.43

- amalgamation, effect of, 127.43(5)
- regulations, Reg. 9700

Air traffic control operations, *see* Nav Canada**Air traffic controller**

- pension accrual to retire early, *see* Public safety occupation

Aircraft

- available-for-use rule, 13(27)(h)
- broadcasting from, 19.1(4)“foreign broadcasting undertaking”
- capital cost allowance, Reg. Sch. II:Cl. 9(g)–(i), Sch. II:Cl. 16(a)–(c)
- capital tax exemption, Canada-U.S. Tax Treaty:Art. XXIII:3
- component manufacturer
- • exception to thin capitalization rules, 18(8) [repealed]
- cost over \$100,000, *see* Luxury Items Tax
- employment, used in
- • costs, 8(1)(j), 8(9)
- employment by U.S. resident on, Canada-U.S. Tax Treaty:Art. XV:3
- food consumed or entertainment enjoyed on, 67.1(4)(a)
- fuel tax rebate, *see* Fuel tax rebate
- GST input tax credit in respect of, 248(17)
- hangar, capital cost allowance, Reg. Sch. II:Cl. 6(h)
- international traffic, used in
- • income of non-resident exempt, 81(1)(c)
- lease payments, non-resident withholding tax exemption, 212(1)(d)(xi)
- manufacturer or developer of
- • exception to thin capitalization rules, 18(8) [repealed]
- non-resident’s income from, exempt, 81(1)(c)
- pilot
- • away-from-home expenses, 8(1)(g)
- • non-resident, Canadian income calculation, 115(3)
- • pension accrual to retire early, *see* Public safety occupation
- QST input tax refund in respect of, 248(17)
- runway, capital cost allowance, Reg. Sch. II:Cl. 1(g), Sch. II:Cl. 17(c)
- • for mine, Reg. Sch. II:Cl. 10(1)(ii)
- used in international traffic, *see* International traffic

Airline corporations

- aviation fuel tax rebate, *see* Fuel tax rebate
- taxable income earned in a province, Reg. 407

Airline pilot, *see* Aircraft: pilot**Airplane**, *see* Aircraft**Airport, for mine, capital cost allowance**, Reg. Sch. II:Cl. 10(1)(i)**Airports relief (COVID)**, Reg. 8901.1(2)(b)(xvii), *see also* Qualifying tourism or hospitality entity**Alarm**

- for infant prone to sudden infant death syndrome, medical expense, Reg. 5700(r)

Alberta, *see also* Province

- labour-sponsored venture capital corporation of
 - prescribed, Reg. 6700(a)(v)
- northern, *see* Northern Canada
- prescribed stock savings plan, Reg. 6705(a)
- tax rates, *see* introductory pages
- unlimited liability company, *see* Nova Scotia: unlimited liability company

Alberta Royalty Tax Credit

- transitional relief, 12(1)(x.2) (application phase-in)

Alberta Stock Exchange

- prescribed stock exchange, 262

Alcatel case overruled, 143.3**Alex Parallel Computers case overruled**, 220(2.2)**Algoa Trust case overruled**, 160(1) closing words, 160(1.1) closing words**Alimony**, *see* Support payments (spousal or child)**All or substantially all**

- not defined (CRA treats it as meaning “90% or more”)

Allied war veterans

- death or disability pension exempt, 81(1)(e)

Allocable amount (for preferred beneficiary election)

- defined, 104(15)
- election to include in beneficiary’s income, 104(14)

Allocated amount

- defined, for mutual fund rules re allocation to redeemers, 132(5.3)

Allocation, *see also* Apportionment

- allocation in proportion to patronage, *see* Patronage
- borrowing, in proportion to, *see also* Borrowing
- by Minister, where associated corporations do not file agreement
 - base level deduction, for soft costs on land, 18(2.4)
 - dividend allowance, for Part VI.1 tax, 191.1(5)
 - expenditure limit, for investment tax credit, 127(10.4)
 - coal mine depletion allowance, 65(3)
- consideration, where combined transfer of property, 13(33), 68
- credits between spouses, *see* Splitting, sharing or apportionment
- foreign tax credit, by trust to beneficiary, 104(22)–(22.4)
- income of trust, to beneficiaries
 - capital gains, 104(21)–(21.7)
 - dividends, 104(19), (20)
 - preferred beneficiary election, 104(13)
- liability for debt obligation, 80(2)(o)
- partnership income among partners, 103
- patronage, in proportion to, *see* Patronage
- proceeds
 - between land and building, 13(21.1), 70(5)(d)
 - between property and services, 68

Allowable business investment loss, *see also* Business investment loss

- capital gains exemption, interaction with, 39(9), 110.6(1)“annual gains limit”B(b), 110.6(1)“cumulative gains limit”(b)
- carryforward, 111(1)(a), 111(8)“non-capital loss”
- reduction on debt forgiveness, 80(4)(a)
- deduction, 3(d)
- defined, 38(c)
- partnership, of, 96(1.7)

Allowable capital loss, *see* Capital loss**Allowable disposition**

- defined, for agricultural cooperatives, 135.1(1)

Allowable refund

- defined
 - for tax on registered plans, 207.01(1)

Allowance

- capital cost, *see* Capital cost allowance
- clergyman’s, not taxable, 6(1)(b)(vi)
- defined
 - capital cost, 20(1)(a), Reg. 1100, *see also* Capital cost allowance
 - for alimony, maintenance, child support, 56(12)
 - for employee benefits, reasonable, 6(1)(b)(x), (xi)
 - retiring, 248(1), *see also* Retiring allowance
- depletion, *see* Depletion allowances
- depreciable property, *see* Capital cost allowance
- disabled employee: transportation and attendant, 6(16)
- employee, 6(1)(b)
 - child’s schooling, 6(1)(b)(ix)
 - exempt, 81(1)(d)
 - family, *see* Canada Child Benefit
 - inventory, repealed [was 20(1)(gg)]
 - investment in property in Canada, 219(1)(j), Reg. 808
 - Member of Legislative Assembly, 81(2) [before 2019]
 - members of Canadian Forces, 6(1)(b)(ii)
 - mines, Reg. Part XII
 - motor vehicle, employee’s, 6(1)(b)(vii.1)
 - where deemed not reasonable, 6(1)(b)(x), (xi)
 - municipal officer’s, 81(3) [before 2019]
 - not income, 6(1)(b)(i)–(ix)
 - oil or gas wells, Reg. Part XII
 - parking, for disabled employee, not income, 6(16)
 - received, as income, 6(1)(b)
 - representation, not income, 6(1)(b)(iii), (iv)
 - resource [repealed], 20(1)(v.1)
 - resource and processing, Reg. Part XII
 - retiring, *see* Retiring allowance
 - support payments, defined with respect to, 56(12)
 - transportation
 - disabled employee, 6(16)
 - remote work site, 6(6)(b)
 - travelling, not income, 6(1)(b)(i), (ii), (v)–(vii)
 - volunteer firefighters and emergency workers
 - not income, 81(4)

Alter ego trust

- deduction from income, 104(6)(b)B(i)
- defined, 104(4)(a)(iv)(A), 248(1)
- distribution of property to person other than taxpayer, 107(4)(a)(ii)
- preferred beneficiary election by, 104(15)(a)
- principal residence exemption, 54“principal residence”(c.1)(iii.1)(A)
- transfer by, to another trust, 104(5.8)
- transfer to, rollover, 73(1.01)(c)(ii)

Alterations to driveway

- medical expense credit, 118.2(2)(1.6)

Altered auditory feedback device

- medical expense credit, Reg. 5700(z.1)

Alternative basis for assessment

- Minister allowed to raise, 152(9)

Alternative Minimum Tax, *see* Minimum tax**Amalgamation**, 87, *see also* Merger

- accrual rules, 87(2)(j.4)
- affiliated corporations, 251.1(2)
- agricultural cooperative corporation, 87(2)(s)
- associated corporations, 256(7)(b)
- balance-due day, 87(2)(oo.1)
- balance of tax for year, when due, 87(2)(oo.1)
- Canadian film or video tax credit, 87(2)(j.94)
- Canadian resource property, 66.7(10)(j), 66.7(10.1)
- capital dividend account, 87(2)(z.1)
- capital dividends, 87(2)(x)(ii)
- capital property, 53(6), 87(2)(e)

Index

- Amalgamation (*cont'd*)
 - carryback of losses, 87(2.11)
 - charitable gifts, 87(2)(v)
 - computation of income, 87(2)(c)
 - continuation of predecessors, 87(2)(g.1), (j.6)–(j.95), (qq)
 - butterfly reorganizations, 55(3.2)(b)
 - contributed surplus, 87(2)(y)
 - corporation beneficiary under life insurance policy, 89(2)
 - corporations deemed related, 251(3.1), (3.2)
 - credit unions in Quebec, 87(2.3)
 - cross-border, 128.2
 - cumulative offset account, computation, 87(2)(pp)
 - debt obligation acquired, 87(2)(e.2)
 - debts
 - between two predecessor corporations, 80.01(3)
 - owing by predecessor corporation, 87(6), (7); ITAR 26(23)
 - owing to predecessor corporation, 87(2)(h)
 - deemed proceeds of disposition, 69(13)
 - defined, 87(1)
 - pre-1972, ITAR 34(7)
 - depreciable property, 87(2)(d), (d.1)
 - employee benefit plans, 87(2)(j.3)
 - employee stock options, 7(1.4), (1.5)
 - employees profit sharing plan election, 87(2)(r)
 - employment tax credit, 87(2)(qq)
 - exchanged shares, 87(4.1), (4.2)
 - exchange of franchise, concession or licence, 87(2)(l.4)
 - farming or fishing insurer, 87(1), 89(1)“taxable Canadian corporation”(b)
 - farm losses, 87(2.1)
 - film/video production services credit, 87(2)(j.94)
 - flow-through entity, 87(2)(bb.1)
 - flow-through shares, 87(4.4)
 - renunciation of CDE as CEE before 2019, calculation of taxable capital limit, 66(12.6013)
 - following debt forgiveness, deemed capital gain, 80.03(3)(a)(ii)
 - foreign, *see* Foreign merger
 - foreign affiliate, shares of, 87(2)(u), Reg. 5905(5.1)
 - foreign affiliates, 87(8), (8.1), Reg. 5905(3)
 - foreign corporation with Canadian resident corporation, 128.2
 - foreign investment entity, interest in, 87(2)(j.95)
 - foreign resource property, 66.7(10)(j), 66.7(10.1)
 - foreign tax carryover, 87(2)(z)
 - functional currency rules, 261(17)–(19)
 - general rate income pool determination, 87(2)(vv), 89(5)
 - insurance corporation, 87(2.2)
 - causing demutualization, 139.1(3)(g)
 - inventory, 87(2)(b)
 - adjustment, 87(2)(j.1)
 - investment tax credit, 87(2)(j.6), (oo.1), (qq)
 - labour-sponsored venture capital corporation, 204.85(3)
 - permission of Minister needed, 204.85(1)
 - lease, cancellation of, 87(2)(j.5)
 - leasing properties, 16.1(4)
 - liability for Part VI.1 tax transferred, 87(2)(ss)
 - life insurance capital dividends, 87(2)(x)(ii)
 - limited partnership losses, 87(2.1)
 - losses
 - carryback, 87(2.11)
 - carryforward, 87(2.1)
 - low rate income pool determination, 87(2)(ww), 89(9)
 - mark-to-market property, 87(2)(e.4)
 - mutual fund corporations, 87(2)(bb)
 - net capital losses, 87(2.1)
 - new corporation
 - deemed continuation of predecessors, 87(1.2), (2)(j.6)–(j.9), (l)
 - accrual rules, 87(2)(j.4)
 - bank reserves, 87(2)(g.1)
 - cancellation of lease, 87(2)(j.5)
 - charitable gifts, 87(2)(v)
 - deduction for Part I.3 tax, 87(2)(j.9)
 - deduction of Part VI tax, 87(2)(j.9)
 - employee benefit plans, 87(2)(j.3)
 - inclusion of deferred amounts for livestock, 87(2)(tt)
 - insurance corporations, 87(2.2)
 - Part III, 87(2)(z.2)
 - Part III.1, 87(2)(z.2)
 - partnership interest, 87(2)(e.1)
 - prepaid expenses, 87(2)(j.2)
 - registered plans, 87(2)(q)
 - whether Canadian corporation, 89(1)“Canadian corporation”
 - new corporation deemed related to predecessors, 251(3.1), (3.2)
 - non-arm’s length transactions, 251(3.1)
 - non-capital losses, 87(2.1)
 - non-qualifying security, gift of, 87(2)(m.1)
 - non-resident trust, interest in, 87(2)(j.95)
 - not acquisition of control, 88(4)
 - obligations, *see* debts (*above*)
 - options
 - expired, 87(2)(o)
 - received on, ITAR 26(22)
 - to acquire shares of predecessor corporation, 87(5), (5.1)
 - paid-up capital, computation of, 87(3), (3.1)
 - partnership interest acquired, 87(2)(e.1)
 - patronage dividends, 87(2)(g.5)
 - pension fund real estate corporations, 149(1)(o.2) closing words
 - pre-1972 capital surplus on hand, 87(2)(t)
 - predecessor corporation
 - continued, 87(2)(jj)–(ll)
 - defined, 87(1)
 - preferred shares, 87(4.1), (4.2)
 - prepaid expenses, 87(2)(j.2)
 - proceeds of disposition not due until later year, 87(2)(m)
 - property lost, destroyed or taken, 87(2)(l.3)
 - public corporation, 87(2)(ii), 87(2)(j)–(ll)
 - qualifying environmental trust, interest in, 87(2)(j.93)
 - Quebec credit unions, 87(2.3)
 - refundable dividend tax on hand, 87(2)(aa)
 - refundable investment tax credit, 87(2)(oo.1)
 - refundable Part VII tax on hand, 87(2)(nn)
 - reserves, carryover to new corporation, 87(2)(g)
 - residence of predecessor corporations, deemed, 128.2
 - resource and processing allowances, Reg. 1214
 - resource expenses, 66.7(6)
 - resource property disposition, consideration for, 87(2)(p)
 - restricted farm loss, 87(2.1)
 - rights, exchange of, 87(4.3)
 - rules applicable, 87(2)
 - scientific research expenditures, 87(2)(l)–(l.2)
 - security acquired, 87(2)(e.2)
 - settlement of debts between predecessors, 80.01(3)
 - shares
 - deemed received, 87(1.1)
 - exchange of, 87(4.1), (4.2)
 - issued by parent, 87(9)
 - predecessor corporations, of, 87(4)
 - received on, ITAR 26(21), 65(5)
 - short-form, 87(1.1), (2.11)
 - special reserve, 87(2)(i), (j)
 - specified debt obligation, 87(2)(e.3)
 - specified property, effect on adjusted cost base, 53(6)
 - squeeze-out, new share deemed listed, 87(10)
 - subsidiary wholly-owned corporation, 87(1.4)
 - tax deferred cooperative shares, 87(2)(s)
 - tax-deferred preferred shares previously issued, 83(7)

- Amalgamation** (*cont'd*)
- taxable dividends, 87(2)(x)
 - taxable preferred shares, tax on, 87(2)(rr)
 - taxation year, 87(2)(a)
 - transitional provisions, ITAR 34
 - triangular, 87(9)
 - vertical
 - • carryback of losses, 87(2.11)
 - • deemed cost of capital properties, 87(11)(b)
 - • deemed proceeds from subsidiary's shares, 87(11)(a)
 - • warranty outlays, 87(2)(n)
- Amateur athlete**
- defined, 143.1(1)
- Amateur athlete trust**, *see also* Athlete
- beneficiary, defined, 143.1(1.2)(e)
 - death of beneficiary, 143.1(4)
 - defined, 143.1(1.2), 248(1)
 - distributions by
 - • deemed
 - • • 8 years after last international competition, 143.1(3)
 - • • on death, 143.1(4)
 - • included in income, 12(1)(z), 143.1(2)
 - • non-resident beneficiary, to
 - • • tax on trust, 210.2(2)
 - • • withholding tax, 212(1)(u), 214(3)(k)
 - emigration of beneficiary, no deemed disposition, 128.1(10)“excluded right or interest”(e)(ii)
 - excluded from various trust rules, 108(1)“trust”(a)
 - no tax payable by, 143.1(1.2)(g), 149(1)(v)
 - rollover to new trust, 248(1)“disposition”(f)(vi)
 - termination of, 143.1(3)
 - trustee, defined, 143.1(1.2)(f)
- Amateur athletic association**, *see* Canadian amateur athletic association; Registered Canadian amateur athletic association
- Ambassador**, *see* Diplomat
- Ambulance**
- excluded from “automobile”, 248(1)“automobile”(b)
 - medical expense credit, 118.2(2)(f)
 - technician, volunteer
 - • exemption from employment income, 81(4)
- Amended Act**
- defined, ITAR 8
- Amendment**
- citation of, *Interpretation Act* s. 40(2)
 - regulations, *Interpretation Act* s. 31(4)
 - when in force
 - • proclamation, *Interpretation Act* s. 18
 - • Royal Assent, *Interpretation Act* s. 6(3)
 - • within power of Parliament, *Interpretation Act* s. 42
- Amendments to elections**, 220(3.2)
- COVID-19 Canada Emergency Wage Subsidy and Canada Emergency Rent Subsidy, 125.7(10)
- American Depositary Receipt**
- qualified investment for RRSP etc., Reg. 4900(1)(w)
- American law**, *see* United States
- Ammonite gemstone**
- treated as mineral, 248(1)“mineral”, “mineral resource”(d)(ii)
- Amortization**
- depreciable property, *see* Capital cost allowance
 - expenditures, *see* Matchable expenditure
- Amortization date (for specified debt obligation)**, Reg. 9200(2)
- Amortized cost**
- defined, 248(1)
 - • re loan or lending asset, 248(1)
 - • re pre-1972 obligation, ITAR 26(12)
 - • variation in, for certain insurers, 138(13)
- Amount**
- defined, 248(1)
 - list of, *see* Dollar amounts in legislation and regulations
 - negative, deemed nil, 257
- Amount of remuneration**
- defined, re payment to a fisherman, Reg. 105.1(1)
- Amounts receivable**
- deceased taxpayer, by, 70(2), (3)
- Amusement parks**
- capital cost allowance, Reg. Sch. II:Cl. 37
 - defined, Reg. 1104(12)
- Amusement parks relief (COVID)**, Reg. 8901.1(2)(b)(viii), *see also* Qualifying tourism or hospitality entity
- Ancillary tuition fees, credit**, 118.5(3)
- Animal**
- breeding, defined, 80.3(1)
 - inventory valuation, 28(1.2), Reg. 1802
 - specified, defined, 28(1.2)
 - trained to assist disabled person, medical expense credit, 118.2(2)(1)
- Animation production**
- allocation of points to determine whether Canadian production, Reg. 1106(5)(b), (c), Reg. 1106(7)
 - defined, Reg. 1106(6)
- Anniversary day**
- investment contract, of, defined, 12(11)“anniversary day”
- Annual child care expense amount**
- defined, 63(3)
- Annual dues**
- professional membership, deduction, 8(1)(i)(i)
 - trade union, etc., deductible, 8(1)(i)(iv)–(vi)
- “Annual gains limit” defined**, 110.6(1)
- Annual investment tax credit limit, defined**, 127(9)
- Annual reporting of interest**, *see* Interest (monetary): accrued
- Annuitant**
- defined
 - • for Home Buyers' Plan, 146.01(1)
 - • for Lifelong Learning Plan, 146.02(1)
 - • for prescribed annuity contracts, Reg. 304(4)
 - • for RRIF, 146.3(1), Reg. 215(1)
 - • for RRSP, 146(1), Reg. 214(7)
 - • for registered labour-sponsored venture capital corporations, defined, 204.8(1)
- Annuity**, Reg. Part III, *see also* Annuity contract
- accrual to date of death, 70(1)(a)
 - accrued interest on, taxable, 12.2
 - advanced, *see* Advanced life deferred annuity
 - buy-out (from RPP), 147.4(1)
 - cancellation or termination of, Reg. 303
 - capital element deductible, 60(a), Reg. 300
 - capital/income elements, 16(4)
 - constitutes life insurance policy, 138(12)“life insurance policy”
 - contract, *see* Annuity contract
 - DPSP investment eligibility, 204“qualified investment”
 - deduction, 20(19)
 - deferred, *see* Advanced life deferred annuity
 - defined, 248(1); *Income Tax Conventions Interpretation Act* s. 5; Canada-U.S. Tax Treaty:Art. XVIII:4; Canada-UK Tax Treaty:Art. 17:3
 - definitions, Reg. 310
 - disposition of
 - • deduction, 20(20)
 - • taxable, 56(1)(d.2)
 - disposition of interest in
 - • information return, Reg. 217
 - emigration of beneficiary, no deemed disposition, 128.1(10)“excluded right or interest”(f)(i)

Annuity (cont'd)

- from pre-1998 pension plan, deemed to be pension payments, 254
- income-averaging, *see* Income-averaging annuity contract
- insured, leveraged, *see* LIA policy
- interest on money borrowed to buy
 - amount deductible, 20(1)(c)(iv)
- life insurance proceeds, as, 148(6), (10)
- locked-in, held by RRIF, 146.3(1)“qualified investment”(b.2)
- money borrowed to buy
 - limitation on deductibility, 18(11)(d)
- PRPP purchase of, 147.5(5)(a), 147.5(21)(c)(vi)
- payments
 - capital element of, 60(a), Reg. 300
 - life annuity contracts, Reg. 301
 - non-residents, to, 212(1)(o)
 - taxable, 56(1)(d)
 - from pooled registered pension plan, taxable, 147.5(23)
- prescribed, Reg. 304, *see also* Prescribed annuity contract
- qualified, defined, Reg. 1408(1)
- RESP investment eligibility, 146.1(1)“qualified investment”(c)
- RPP (defined-contribution) purchase of, 147.3(1)(c)(iv), Reg. 8506(1)(e.2)
- RPP conversion to, 147.4(1)
- RRIF investment eligibility, 146.3(1)“qualified investment”(b.1), (b.2)
- RRSP investment eligibility, 146(1)“qualified investment”(c)–(c.2)
- RRSP premium refund transferred to, 60(1)
- receipt of, income, 56(1)(d), (d.2)
- registered pension plan, 147.4
- variable, *see* Variable payment life annuity
- withholding tax, 153(1)(f), 212(1)(o)

Annuity contract

- defined, for Common Reporting Standard, 270(1)

Annulment

- charity registration, *see* Registered charity: registration of: annulment of registration

Antecedent corporation

- defined, 95(1)

Anti-avoidance rules

- abuse of the Act, 245(4)
- acquisition of option rather than shares to avoid various rules, 256(8)
- arm’s length rule, 246(2)
- associated corporations, 256(2.1)
- at-risk amount of limited partner, 96(2.6), (2.7)
- attribution rules, *see* Attribution rules
- avoidance transaction, defined, 245(3)
- back-to-back loans, *see* Back-to-back loans
- back-to-back-royalties, 212(3.9)–(3.94)
- blocking deficits, Reg. 5905(7.1)–(7.7)
- business limit (small business deduction), 125(9)
- Canada Emergency Wage Subsidy (CEWS) and Canada Emergency Rent Subsidy (CERS), 125.7(6)
- Canada Recovery Hiring Program (CRHP), 125.7(6.1)
- Canadian controlled private corporations, 248(1)“substantive CCPC”, 248(3)
- capital dividend, share acquired to receive, 83(2.1)
- capital gains exemption
 - allocated through partnership or trust, 110.6(11)
 - butterfly, on, 110.6(7)(a)
 - conversion of dividends into exempt capital gains, 110.6(8)
 - failure to declare exempt gain, 110.6(6)
 - gain of corporation converted to gain of individual, 110.6(7)(b)
 - sale of shares of corporation, 84.1(2)(a.1)(ii), 84.1(2.1)(b)
- capital gains stripping, 55(2), 110.6(7)(a)
- charitable donation flips, 248(35)–(41)

- charitable donation returned to donor, 110.1(14)–(17), 118.1(25)–(28)
- charity’s disbursement quota, 149.1(4.1)
- Common Reporting Standard (reporting of account information to foreign tax authorities), 280
- contingent amounts in expenditures, 143.4
- corporate members of partnerships, 34.2, 125(6), 125(7)“specified partnership income”
- corporations becoming related to transfer forgiven amount of debt, 80.04(8)
- corporations deemed associated, 256(2.1)
- cross-border purchase butterfly, 55(3.1)
- debt forgiveness reserve, 61.3(3), 160.4
- debt parking, 39(2.01)–(2.03), 80.01
- deferral of tax
 - corporate partner, 34.2
 - individual partner, 34.1
- deductions accrued but unpaid, 78
- derivatives, mark-to-market restrictions, 10.1
- determination by Minister of tax consequences, 152(1.11), (1.12)
 - binding effect, 152(1.3)
- disbursement quota of charity, 149.1(4.1)
- disposition not at arm’s length, 69(1)
- disposition of share of foreign affiliate, 93(2)–(2.3)
- divestment obligation percentage (private foundation), 188.1(3.2)–(3.5)
- dividend refund, 129(1.2)
- dividend stripping, *see* Surplus stripping
- donation of flow-through shares, 40(12)
 - after rollover of shares, 38.1
- eligible dividends, 89(1)“excessive eligible dividend designation”(c)
- emigration
 - deemed disposition by trust of assets transferred before emigration, 104(4)(a.3)
 - deemed disposition of assets, 128.1(4)
- employees profit sharing plans (excess EPSP amount), 207.8
- FATCA, 268
- foreign account reporting, 268, 280
- foreign accrual property income
 - insurance of Canadian risks (and insurance swaps), 95(2)(a.2)–(a.24)
 - offshore regulated banks, 95(2.11)
- foreign accrual tax, 91(4.1)–(4.7)
- foreign affiliate dumping, 212.3
 - corporate emigration, 219.1(2)
 - corporate immigration, 128.1(1)(c.3)
 - cross-border class, anti-avoidance rule, 212.3(6)
- foreign affiliate rules, 95(6), Reg. 5905(7.1)–(7.7)
 - artificial generation of FAT, 91(41)
 - artificial generation of UFT, Reg. 5907(1.03)
 - loans from foreign affiliates, 90(6)–(15)
 - surplus computations, Reg. 5907(2.02)
- foreign affiliate share-for-share exchange, 85.1(4)(a)
- foreign currency debt parking, 39(2.01)–(2.03)
- foreign investment entities, *see* Tax avoidance motive
- foreign mergers, 87(8.3)
- foreign partnership, 96(9)(a)
- foreign resource property, 85(1.11)(a)
- foreign tax credit, 126(4)–(4.3)
 - FTC generators, 91(4.1)–(4.7), 126(4.11)–(4.13), Reg. 5907(1.03)–(1.09)
- functional currency reporting, 261(18)–(21)
- general rule, 245(2), *see also* General anti-avoidance rule
- gift of property, 69(1)(b)(ii), 74.1, 160(1)
- goodwill, transition from eligible capital property to CCA, 13(40)
- gross revenue increases for transfer pricing rules, 247(9)
- hedges crossing year-end, 18(17)–(23)

Index

- Anti-avoidance rules (*cont'd*)
 - income-splitting tax, 120.4, *see also* Split income
 - income-splitting through spousal RRSPs, 146(8.3), 146.3(5.1)–(5.5)
 - indirect loan to non-resident, 17(2)
 - insurance corporations, 138(2.6)
 - interest coupon stripping, 212(1)(b)(i)(B), 212(21)–(23)
 - interest deduction restrictions, 18.2(12)–(15), 18.21(6)
 - interest-free or low-interest loans, 56(4.1)
 - investment tax credit
 - qualified expenditures, 127(24)
 - transfer of SR&ED pool, 127(16)
 - life insurance policies
 - distribution of proceeds
 - by corporation, 89(1)“capital dividend account”(d)(iii)
 - by partnership, 53(1)(e)(iii)
 - exempt policy, Reg. 306(1)
 - transfer of, not at arm’s length, 89(1)“capital dividend account”(d)(v), 148(7)
 - life insurer using foreign branch to insure Canadian risks, 138(2.1)–(2.6)
 - loan from corporation, 15(2)–(2.6), 90(6)–(15)
 - loan not at arm’s length, 56(4.1)–(4.3)
 - loan to non-resident, 17
 - through partnership, 17(4)
 - through trust, 17(5)
 - look-through for trusts and partnerships, on non-arm’s length sale of shares, 212.1(7)
 - loss carryover rules, on change of corporate control, 111(5.5)(b)
 - losses imported by partnership by acquiring Canadian partner, 96(8), (9)
 - misuse of the Act, 245(4)
 - mutual fund trust election for December 15 year-end, where beneficiaries change, 132.11(8)
 - newspaper or periodical, control by non-resident, 19(8)
 - non-resident trust, indirect transfer to, 94(2)
 - non-resident trust transfer to another trust, 94(11)–(13)
 - offshore trusts, 94
 - 150-investor rule for non-resident trusts, 94(15)(a)
 - partnership acquiring capital properties to avoid debt forgiveness rules, 80(18)
 - partnership, by, 103
 - partnership capital contribution where other partner withdraws funds, 40(3.13)
 - partnership interest disposition, 100(1.4), (1.5)
 - partnership with non-resident partners importing losses, 96(8), (9)
 - payment of capital dividend through trust to non-resident, 212(1)(c)(i)
 - penalties, *see* Penalty
 - pension adjustment, artificial reduction of, Reg. 8503(14)
 - pension, past service employer contributions in lieu of salary, Reg. 8503(15)
 - pregnant losses, *see* Pregnant loss
 - private foundations, 149.2(2), 188.1(3.2)–(3.5)
 - purchase butterfly, 55(1)“permitted exchange”, (3.1), (3.2)
 - registered disability savings plan (RDSP)
 - advantage, prohibited investment or non-qualified investment, 207.01–207.07
 - registered education savings plan (RESP)
 - advantage, prohibited investment or non-qualified investment, 207.01–207.07
 - replacement of beneficiary, 204.9(4)
 - registered pension plan phased retirement rules, Reg. 8503(22)
 - registered pension plan, replacement of money purchase benefits, Reg. 8304(2)(f)
 - reportable transaction rules, 237.3
 - residence of corporation, 250(5)
 - retirement compensation arrangement
 - disposition for less than fair market value, 56(11)
 - “right to reduce” an expenditure, 143.4
 - royalty reimbursements, 80.2
 - SIFT rollovers, 248(1)“SIFT trust wind-up event”(e)
 - sale of shares by non-resident, 212.1
 - sale of shares for dividend stripping, 84.1
 - section 160 planning, 160(5)
 - securities lending arrangement, 260(1)“securities lending arrangement” closing words, *see also* Specified hedging transaction
 - selling property and donating proceeds to charity, 248(39)
 - share acquired to obtain dividend refund, 129(1.2)
 - share repurchase transaction, 112(5.2)B(a)
 - small business deduction limit, 125(9)
 - corporate partners, 34.2, 125(6), 125(7)“specified partnership income”
 - small business investment rollover, 44.1(12)
 - specified member of partnership, 40(3.131), 127.52(2.1)
 - stapled securities, 12.6
 - stop-loss rules, *see* Stop-loss rules
 - straddle transactions, 18(17)–(23)
 - surplus stripping, *see* Surplus stripping
 - synthetic equity arrangements, 112(2.3)–(2.34)
 - TFSA, 207.01–207.07
 - tax debt avoidance, 160(5)
 - testamentary trust, 108(1)“testamentary trust”(d)
 - transfer of insurance business by non-resident insurer, 138(11.7)
 - transfer of property between trusts to delay deemed disposition rules, 104(5.8)
 - transfer of property by tax debtor, 160
 - transfer of property for low or no consideration, 69(1)(b), 74.1, 160(1)
 - transfer of property with pregnant loss, 13(21.2), 40(3.3), (3.4)
 - transfer pricing, 247
 - treaty shopping, Canada-U.S. Tax Treaty:Art. XXIX-A
 - trust distributing assets before death, 104(4)(a.2)
 - trust, excessive capital interest, 104(7.1), (7.2)
 - trust receiving assets before emigration, 104(4)(a.3)
 - trust with accrued loss, acquisition of interest in, 107(6)
 - trusts, allocation of income and capital to different beneficiaries, 104(7.1), (7.2)
 - underlying foreign tax, Reg. 5907(1.03)
 - unreasonable consideration, 247
 - withholding tax on dividends, Canada-U.K. Tax Treaty Art. 10:7
 - withholding tax on interest, Canada-U.K. Tax Treaty Art. 11:11
 - withholding tax on royalties, Canada-U.K. Tax Treaty Art. 12:8
- Anti-dumping duties or countervailing duties**
 - deductible, 20(1)(vv)
 - included in UCC of depreciable property, 13(21)“undepreciated capital cost”D.1
 - refund of
 - deducted from UCC of depreciable property, 13(21)“undepreciated capital cost”K
 - taxable, 12(1)(z.6)
- Anti-money laundering and know your customer procedures**
 - defined, for Common Reporting Standard, 270(1)
- Antiques, CCA disallowed**, Reg. 1102(1)(e)
- Antoine Guertin Liée case overruled**, 20(1)(e.2)
- Appeal**, *see also* Tax Court of Canada
 - bifurcation, 171(2)
 - books and records, 230(6)
 - disposal of
 - Minister’s duty after, 164(4.1)
 - reassessment, on consent, 169(3)
 - Tax Court, by, 171

- Appeal** (*cont'd*)
- ecological property valuation, 169(1.1)
 - expense of making, deduction, 60(o)
 - extension of time for making, 167
 - Federal Court of Appeal, to, *see* Federal Court of Appeal
 - frivolous, 10% penalty, 179.1
 - general procedure, 175
 - grounds for, whether raised in Notice of Objection, 169(2.1)
 - *in camera* proceedings in Federal Court, 179
 - informal procedure, 170
 - large corporation by, only on grounds raised in objection, 169(2.1)
 - legal costs of, 152(1.2)
 - limitation on grounds for filing, 169(2), (2.1)
 - Minister may change grounds for assessment, 152(9)
 - notice of, Tax Court to Commissioner, 170(1)
 - Part IV.1 tax, 187.6
 - Part VI.1 tax, 191.4(2)
 - Part XII.2 tax, 210.2(7)
 - Part XII.3 tax, 211.5
 - Part XII.4 tax, 211.6(5)
 - Part XII.5 tax, 211.82
 - repayment on, 164(1.1)
 - restriction on collection action while underway, 225.1
 - stay of, during action, 239(4)
 - Tax Court decisions, from, 174(4.1)
 - Tax Court of Canada, to, 169, 170, 174
 - time not counted, 173(2), 174(5)
 - transitional provisions, ITAR 62(4)–(6)
 - where no reasonable grounds for, 179.1
 - where right to appeal waived, 169(2.2)
 - withholding tax on dividends, Canada–U.K. tax treaty Art. 10:7
 - withholding tax on interest, Canada–U.K. tax treaty Art. 11:11
 - withholding tax on royalties, Canada–U.K. tax treaty Art. 12:8
- Appliance service technician**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Applicable fraction (for debt forgiveness rules)**
- application of to capital losses, 80(4)
 - defined, 80(2)(d)
- Application deadline**
- defined, Reg. 1106(1)“application for a certificate of completion”
- Application for a certificate of completion**
- defined, for Canadian film/video credit, Reg. 1106(1), (1.1)
- Application for continuance (for Canadian Wheat Board)**
- defined, 135.2(1)
- Apportionment**, *see also* Allocation; Splitting, sharing or apportionment
- bond interest to date of sale, 20(14)
 - income accrued to date of death, 70(1)(a)
 - proceeds of disposition, between property and services, 68
 - tax credit, *see* Splitting, sharing or apportionment
 - taxable and exempt income, between, 149(6)
- Apprentice**
- grant to, *see* Apprenticeship Incentive Grant or Apprenticeship Completion Grant
 - job creation, investment tax credit, 127(9)“apprenticeship expenditure”, 127(9)“investment tax credit”(a.4)
 - mechanic
 - eligible, defined, 8(6)(a)
 - tools, deduction from employment income, 8(1)(r)
 - GST rebate on, 6(8)
 - income inclusion on sale of tools, 56(1)(k)
 - rollover of tools to corporation, 85(5.1)
 - rollover of tools to partnership, 97(5)
 - payments received by, Canada-U.S. Tax Treaty:Art. XX
- Apprenticeship expenditure**
- defined, 127(9)
 - reduction for assistance received, 127(11.1)(c.4)
 - investment tax credit for, 127(5)(a)(i), 127(9)“investment tax credit”(a.4)
 - carryforward or carryback, 127(9)“investment tax credit”(c)
- Apprenticeship Incentive Grant or Apprenticeship Completion Grant**
- information return required, Reg. 200(2)(b.1)
 - is earned income for child care expense, 63(3)“earned income”(b)
 - repayment of, deductible, 60(p)
 - taxable, 56(1)(n.1)
- Appropriate minister**
- defined, 13(21)
- Appropriate percentage**
- defined, 248(1)
- Appropriation Act**
- interest paid under
 - deduction for, 20(1)(c)(iii)
- Appropriation of amounts**
- to transfer balance between tax accounts, 221.2
- Appropriation of property**
- by shareholder, generally, 69(4)
 - legal representative, by, 159(3.1)
 - on winding-up of corporation, 69(5), 84(2)
- Approved pension plan**
- included in reference to “registered” plan, ITAR 17(8)
- Approved project, defined, 127(9)**
- Approved project property [repealed]**
- defined, 127(9)
- Approved share**
- clawback on disposition, 211.8(1)
 - defined, 127.4(1), 211.7(1)
- Arbitration of disputes**
- United Kingdom, Canada-U.K. Tax Treaty:Art. 23:6, 7
 - United States, Canada-U.S. Tax Treaty:Art. XXVI:6, 7; Fifth Protocol (2007) Annex A
- Arcade games relief (COVID)**, Reg. 8901.1(2)(b)(ix)(A)(IV), (b)(xv), *see also* Qualifying tourism or hospitality entity
- Armed forces**, *see* Canadian Forces and veterans
- Arm’s length**
- allocation, *see* Arm’s length allocation
 - dividend dealings, 55(4), (5)(e)
 - meaning of, 251(1)
 - beneficiary and trust, 251(1)(b)
 - for CCA purposes, Reg. 1102(20)
 - for currency dealings with foreign affiliate, 95(2.1)
 - for debt forgiveness rules, 80(2)(j)
 - for divisive reorganizations, 55(4), (5)(e)
 - for non-arm’s length sale of shares, 84.1(2)(b), (d), 212.1(3)(c)
 - for resource expenses renounced to partnership on flow-through shares, 66(17)
 - for s. 160 avoidance of tax debts, 160(5)(a)
 - for stock option rules, mutual fund trust, 7(1.11)
 - for tax shelter investment where information outside Canada, 143.2(14)
 - for windup of subsidiary, 88(1)(d.2)
 - not deemed to confer benefit, 246(2)
 - transfer, *see* Arm’s length transfer
 - transfer price, *see* Arm’s length transfer price
- Arm’s length allocation**
- defined, 247(1)
- Arm’s length capital**
- defined, for income-splitting tax, 120.4(1)

- Arm's length transfer**
 - defined, 94(1)
 - price, *see* Arm's length transfer price
- Arm's length transfer price**, *see also* Transfer pricing
 - defined, 247(1)
 - required for transactions with related non-residents, 247(2)
- Arrears interest**
 - defined, for corporate interest offset, 161.1(1)
- Arrija case overruled**, 118.5(1)(d)
- Arrival in Canada**, *see* Becoming resident in Canada
- Art**, *see also* Cultural property; Listed personal property
 - whether CCA allowed, Reg. 1102(1)(e)
- Art flips**
 - donation valued at cost of art, 248(35)–(38)
 - minimum \$1,000 proceeds eliminated, 46(5)
 - penalties for valuers and promoters, 163.2
- Art shelters**, *see* Art flips
- Artificial eye, medical expense**, 118.2(2)(i)
- Artificial kidney machine, medical expense**, 118.2(2)(i)
- Artificial limb**
 - costs, as medical expenses, 118.2(2)(i)
- Artificial transactions**, *see* Anti-avoidance rules
- Artist**
 - artistic endeavour, 10(6)–(8)
 - expenses, deduction from employment income, 8(1)(q)
 - gift of work of art created by, 118.1(7), (7.1)
 - organization for, *see* Registered national arts service organization
 - project grant, included in income, 56(1)(n)
 - U.S. resident, Canada-U.S. Tax Treaty:Art. XVI
 - valuation of inventory, 10(6)–(8)
- Artistic endeavour**
 - defined, 10(8)
 - value of inventory, 10(6), (7)
- Artistic events relief (COVID)**, Reg. 8901.1(2)(b)(iv), *see also* Qualifying tourism or hospitality entity
- Artistic work, copyright royalties**
 - no withholding tax, 212(1)(b)(vi), 212(9)(b)
- Arts credit for children**, *see* Children's Arts Tax Credit (pre-2017)
- Arts service organization**, *see* Registered national arts service organization
- "As registered" (pension plan), meaning**, 147.1(15)
- Asian Development Bank**
 - bonds of, qualified investment for RRSP etc., 204"qualified investment"(c.1) (formerly Reg. 4900(1)(l)(iii))
- Assessable distribution**
 - defined, for Part XIII.2 tax, 218.3(1)
 - does not reduce adjusted cost base of capital interest in trust, 53(2)(h)(i.1)(B)(III)
 - payment of to non-resident
 - information return, Reg. 202(1)(f)
 - tax on, 218.3(2)
- Assessable dividend (for Part IV tax)**
 - defined, 186(3)
 - tax on, 186(1)(a)
- Assessment**, *see also* Determination; Reassessment
 - alternative basis for, permitted, 152(9)
 - amounts received under RCA trust, re, 160.3(2)
 - appeal from, *see* Appeal
 - arbitrary, 152(7)
 - consequential, of other taxation year, 152(4.3)
 - date of mailing, 244(14)
 - date of making, 244(15)
 - derivative, 160
 - determination binding, 152(1.3)–(3)
 - excess refund, 160.1(3)
 - failure to withhold tax, 227(10)–(10.8)
 - includes reassessment, 248(1)
 - incorrect or incomplete, 152(3), (8)
 - irregularities in, not invalidating, 152(3), (8), 166
 - issue in respect of, reference to Tax Court, 173
 - jeopardy, 225.2
 - losses, of, *see* Determination
 - Minister, by, 152(1)
 - net worth, 152(7)
 - notice of, 152(2)
 - date of, 244(14), (15)
 - electronic
 - allowed for corporation, 244(14.2)
 - allowed if individual's return is e-filed, 150.1(4.1)
 - allowed if email address given by individual, 244(14.1)
 - when presumed received, 244(14.1)
 - objection to, *see* Objection
 - Part IV.1 tax, 187.6
 - Part VI.1 tax, 191.4(2)
 - Part XII.2 tax, 210.2(7)
 - Part XII.3 tax, 211.5
 - Part XII.4 tax, 211.6(5)
 - Part XII.5 tax, 227(10.01), 227(10.1)(c), 211.82
 - Part XII.6 tax, 211.91(3)
 - transitional provision, ITAR 62(1)
 - valid and binding despite defects, 152(8)
 - zipper penalty, 163.3(5)
- Asset**
 - computation of, for debt forgiveness reserve, 61.3(1)(b)B(i)
 - lending
 - defined, 248(1)
 - of insurer/moneylender
 - limitation on deduction re, where reduced in value, 18(1)(s)
- Asset-backed securities**
 - qualified investment for RRSP etc., 204"qualified investment"(c.1) (formerly Reg. 4900(1)(i.3))
- Assignee**, *see also* Legal representative
 - deemed to be legal representative, 248(1)"legal representative"
 - obligations of, 159
 - return required by, 150(3)
 - withholding tax, liability for, 227(5), (5.1)(g)
- Assignment**
 - rights to income, 56(4)
 - tax refund, permitted, 220(6)
- Assistance/government assistance**
 - air quality improvement credit, 127.43(5)
 - Canadian development expense, in respect of, 66.2(5)"Canadian development expense", 66.2(5)"cumulative Canadian development expense"D, M
 - Canadian exploration expense, in respect of, 66.1(6)"Canadian exploration expense", 66.1(6)"cumulative Canadian exploration expense"E, J
 - Canadian film/video tax credit
 - constitutes assistance for all purposes, 125.4(5)
 - defined, 125.4(1)
 - Canadian oil and gas property expense, in respect of, 66.4(5)"Canadian oil and gas property expense", 66.4(5)"cumulative Canadian oil and gas property expense"D, I
 - capital cost allowance, effect on, 13(7.1)
 - carbon tax refund to farmers, 127.42(7)
 - defined
 - for air quality improvement credit, 127.43(1)
 - for film/video production services tax credit, 125.5(1)
 - for investment tax credit, 127(9)"government assistance"
 - for journalism labour credit, 125.6(1)
 - for resource exploration and development rules, 66(15)"assistance"

- Assistance/government assistance (*cont'd*)
 - includes GST input tax credits, 248(16)–(18)
 - includes QST input tax refunds, 248(16.1), (17.1), (17.3), (18.1)
 - employer, provided by, for housing, 6(23)
 - expired, treated as repaid, 127(10.8)
 - exploration and development grant, deductible, 20(1)(kk)
 - film/video production services tax credit
 - constitutes assistance for all purposes, 125.5(5)
 - defined, 125.5(1)
 - flow-through mining expenditure reduced, 127(11.1)(c.2)
 - GST input tax credit or rebate deemed to be, 248(16)
 - GST input tax credit repaid deemed to be reduction in, 248(18)
 - government, defined, 127(9)
 - housing subsidy provided by employer, taxable, 6(23)
 - included in income, 12(1)(x)
 - increases adjusted cost base of partnership interest, 53(1)(e)(ix)
 - indirect, taxable, 12(1)(x)(i)(C)
 - investment tax credit reduction, 127(18)–(21)
 - non-government, defined, 127(9)
 - pre-production mining expenditure reduced, 127(11.1)(c.3)
 - prescribed benefit under government program
 - overpayment repaid, deductible, 60(n)(v)
 - taxable, 56(1)(a)(vi), Reg. 5502
 - QST input tax refund or rebate deemed to be, 248(16.1)
 - QST input tax refund repaid deemed to be reduction in, 248(18.1)
 - qualified expenditures, effect on, 127(18)–(21)
 - reduces adjusted base of partnership interest, 53(2)(c)(ix)
 - reduces adjusted cost base of property, 13(7.1), 127(11.1)(b)
 - reduces claim for scientific research, 37(1)(d)
 - reduces R&D expenditures, 127(11.1)(f) [repealed], 127(18)
 - repayment of
 - creates capital loss, 39(13)
 - deduction for, 20(1)(hh)
 - excluded from reduction in cost base, 53(2)(k), 53(2)(s)
 - includes repaid GST input tax credit, 248(18)
 - increases investment tax credit, 127(9)“investment tax credit”(e.1), 127(10.7)
 - reduces adjusted cost base of partnership interest, 53(1)(e)(ix)(B)
 - resource-related
 - allocated to member of partnership, 66.1(7), 66.2(6), (7), 66.4(6), (7)
 - increases adjusted cost base of partnership interest, 53(1)(e)(ix)
 - tax shelter investment excluded, 125.4(4)
- Assistance holdback amount**
 - defined, for RDSP, 146.4(1)
- Assistant's salary paid by employee**
 - CPP contributions, UI/EI premiums deductible, 8(1)(l.1)
 - deduction, 8(1)(i)(ii)
 - certificate of employer, 8(10)
 - Quebec Parental Insurance Plan premiums deductible, 8(1)(l.2)
- Associated charities**
 - designation by Minister, 149.1(7)
 - disbursement by one to another, 149.1(6)(c)
- Associated corporations**, *see also* Related persons
 - amalgamation, following, 256(7)(b)
 - anti-avoidance rules
 - separate corporations deemed associated, 256(2.1)
 - transfer of assets for passive income SBD grind, 256(2.1)
 - base level deduction, 18(2.3)–(2.5)
 - certain shares excluded from fair market valuations, 256(1.6)
 - corporations associated with same corporation deemed associated with each other, 256(2)
 - defined, 256(1)
 - investment income from, 129(6)
 - investment tax, allocation of expenditure limit, 127(10.2)–(10.4)
 - land soft costs, allocation of base level deduction, 18(2.3)–(2.5)
 - options, 256(1.4)
 - parent deemed to own child's shares, 256(1.3)
 - Part VI.1 tax, allocation of dividend allowance, 191.1(3)–(5)
 - person deemed related to himself, 256(1.5)
 - refundable SR&ED credit, special rule, 127.1(2.2), (2.3)
 - rights, 256(1.4)
 - small business deduction, 125(3)–(5)
 - specified class of shares, defined, 256(1.1)
 - SR&ED expenditure limit for investment tax credit, special rule, 127(10.22), (10.23)
- Association of Universities and Colleges of Canada, exempt**, 149(1)(h.1)
- Associations**
 - non-profit exemption, 149(1)(l)
- Assumption of debt**, 20(1)(e)(ii.2), 20(1)(e.1)(iii)
 - debt forgiveness rules do not apply, 80(1)“forgiven amount”B(l)
- At-risk adjustment (for tax shelter)**
 - defined, 143.2(2), (3)
- At-risk amount**, *see also* Limited partner; Tax shelter
 - artificial transactions, 96(2.6), (2.7)
 - defined, 96(2.2)
 - limited partner's losses restricted to, 96(2.1)
 - limited partnership interest acquired by subsequent person, 96(2.3)
 - resource expenditures, 66.8
- Athlete**
 - amateur junior players, room and board exempt, 6(1)(b)(v.1)
 - association for, *see* Registered Canadian amateur athletic association
 - income of, Canada–U.S. Tax Treaty, Canada–U.S. Tax Treaty:Art. XVI
 - Major League Baseball Players Benefit Plan, Reg. 6800
 - National Hockey League referees, Reg. 6801(c), 6802(d)
 - signing bonus, taxable, 6(3), 115(2)(c.1), 115(2)(e)(v)
 - trust for, *see* Amateur athlete trust
 - tuition support received by, no tuition credit, 118.5(1)(a)(v)
 - U.S. resident, Canada–U.S. Tax Treaty:Art. XVI
- Atlantic Groundfish Adjustment Program/Atlantic Groundfish Strategy**, *see* Fishing: compensation programs
- Atlantic Investment Tax Credit**, 127(9)“investment tax credit”(a), 127(9)“specified percentage”(a)(iii)(D), (a.1)
- Attendant**, *see also* Part-time attendant
 - for taxpayer or dependant mentally or physically impaired
 - allowance paid by employer, not income, 6(16)
 - deduction from income, 64(a)A(ii)(J)
 - residents absent from Canada, 64.1
 - medical expense credit, 118.2(2)(b), (b.1), (c)
 - reimbursement of expenses, 118.2(3)(b)
- Attorney**, *see* Lawyer
- Attribute trading restriction**
 - defined, 256.1(1)
- Attributed surplus (of financial institution)**
 - defined, 181(2), 190(1.1)
- Attributed surplus (non-resident insurer)**
 - defined, 219(7), Reg. 2400(1)
 - Large Corporations Tax, Reg. 8600
- Attribution rules**, *see also* Income-splitting
 - Canada Child Benefit cheque deposited for child's benefit, 74.1(2)
 - deemed receipt of dividend, 82(2)
 - “designated person” defined, 74.5(5)
 - foreign income, *see* Foreign accrual property income
 - gain/loss from property transferred or loaned, 74.2

Index

- Attribution rules (*cont'd*)
 - farm property, 75.1
 - trust, to, 74.3(1)(b)
 - income-splitting tax, 120.4, *see also* Split income
 - indirect payments, 56(2)
 - interest-free or low-interest loans, 56(4.1)
 - loan or indebtedness, 56(4.1)–(4.3)
 - property transferred to child, 74.1(2), 75.1
 - property transferred to spouse
 - capital gain/loss on, 74.2(1)
 - income from, 74.1(1)
 - property transferred to trust
 - income, gain or loss transferor's, 75(2)
 - trusts excluded, 75(3)
 - qualifying trust annuity payment, 75.2(a)
 - RRSP spousal contributions, 146(8.3)
 - reverse attribution, excluded, 74.5(11)
 - Saskatchewan Pension Plan contributions, exceptions for, 74.5(12)
 - spousal RRSP premiums, exception for, 74.5(12)
 - TFSA, exception for, 74.5(12)(c)
 - transfer or loan to child, 74.1(2)
 - transfer or loan to corporation
 - income/loss from property transferred or loaned, 74.1
 - trust, to, 74.3(1)(a)
 - transfer or loan to spouse, 74.1(1), 74.2(1)
 - where not applicable, 74.5
- Auction of seized chattels**, 225(2)–(4)
- Audio tapes or CDs**
 - talking textbooks
 - disability supports deduction, 64(a)A(ii)(I)
 - medical expense credit, Reg. 5700(w)
- Audiologist**
 - certification of hearing impairment
 - for disability credit, 118.3(1)(a.2)(iii)
 - defined, 118.4(2)
- Audit**, 231.1(1)
 - compliance required, 231.5(2), 231.7
 - contemporaneous documentation for transfer pricing, 247(4)
 - copies or printouts of documents, 231.5(1)
 - court order for compliance, 231.7
 - fishing expedition, 231.2(3)
- Auditory feedback device**
 - medical expense credit, Reg. 5700(z.1)
- Aunt**, *see also* Niece/nephew
 - defined, 252(2)(e)
 - dependent, 118(6)(b)
 - great-aunt defined, 252(2)(f)
- Australia**, *see also* Foreign government
 - currency loan, *see* Weak currency debt
 - currency of, use as functional currency, 261(1)“qualifying currency”(d)
 - stock exchange recognized, 262
 - trust, *see* Australian trust
 - universities, gifts to, Reg. Sch. VIII, s. 17
- Australian trust**, 93.3
 - defined, 93.3(1)
- Austria**, *see also* Foreign government
 - stock exchange recognized, 262
 - universities, gifts to, Reg. Sch. VIII, s. 4
- Author**
 - deduction from employment income, 8(1)(q)
- Authorized foreign bank**
 - branch-establishment rollover, 142.7(3)
 - branch interest tax, 218.2
 - branch tax allowance, Reg. 808(8)
 - capital tax rules, 181.3(3)(e), 181.3(4)(c), 190.13(d), 190.14(1)(c)
 - conversion of Canadian affiliate to branch, 142.7
 - debt of, qualified investment for deferred income plans, 146(1)“qualified investment”(b)(ii), 146.1(1)“qualified investment”(b)(ii), 146.3(1)“qualified investment”(b)(ii), 204“qualified investment”(b)(ii)
 - deemed resident in Canada for withholding tax rules, 212(13.3)
 - defined, 248(1)
 - foreign tax credit, 126(1.1)
 - interest deduction, 18(1)(v), 20.2
 - payments to, non-resident tax
 - no withholding tax [before Aug. 8/09], Reg. 105(2)(b), 800, 803.1
 - tax payable directly [before Aug. 8/09], Reg. 801–803.1
 - reassessment beyond 4-year deadline, 152(4)(b)(iii.1)
 - taxable income earned in Canada, 115(1)(a)(vii)(B)
 - winding up into, Reg. 9204(2.1)
- Authorized person**
 - defined, re communication of taxpayer information, 241(10)
- Automobile**, *see also* Motor vehicle; Passenger vehicle
 - available to shareholder, benefit, 15(5), (7)
 - benefit related to operation of, includable in employee's income, 6(1)(a)(iii)
 - benefit related to use of, not includable in employee's income, 6(1)(a)(iii)
 - benefit to shareholder, 15(5)
 - capital cost allowance
 - exclusion, Reg. 1102(1)(h), 1102(11)–(13)
 - limitation, *see* Passenger vehicle: luxury
 - cost over \$34,000, *see* Passenger vehicle: luxury
 - cost over \$100,000, *see* Luxury Items Tax
 - dealer, taxable benefit to sales employees, 6(2.1)
 - defined, 248(1)
 - electric, *see* Zero-emission passenger vehicle; Zero-emission vehicle
 - employee's, capital cost allowance, Reg. 1100(6)
 - expenses
 - employee, of, 8(1)(h.1)
 - limitations on deductibility, 13(7)(g), (h), 18(1)(r), 67.2, 67.3
 - gasoline for, *see* operating costs (*below*)
 - insurance, *see* operating costs (*below*)
 - interest cost limit, *see* Passenger vehicle: luxury
 - lease expense limit, *see* Passenger vehicle: luxury
 - luxury, *see* Passenger vehicle: luxury
 - maintenance, *see* operating costs (*below*)
 - mechanic, *see* Apprentice: mechanic
 - operating costs
 - benefit
 - employee-owned car, 6(1)(l)
 - employer-owned car, 6(1)(k), Reg. 7305.1
 - shareholder, received by, 15(5)
 - deductible
 - by employee, 8(1)(h.1)
 - by employer, 9(1)
 - parking for, taxable benefit, 6(1)(a), 6(1.1)
 - payments by, non-resident withholding tax, 212(13.3)
 - provided to employee
 - amount included in income, 6(1)(e), (k), 6(2)
 - cost includes GST, 6(7)
 - provided to partner
 - amount included in income, 12(1)(y)
 - provided to shareholder
 - amount included in income, 15(5)
 - purchase loan to employee, 15(2.4)(d)
 - salesperson, standby charge for use of vehicle, 6(2.1)
 - short-term rental/leasing, for
 - capital cost allowance, Reg. Sch. II:Cl. 16

Automobile (*cont'd*)

- standby charge, 6(1)(e)
- • reasonable amount, 6(2)
- • salesperson, reasonable amount, 6(2.1)
- trade-in, allocation of consideration, 13(33)
- used by employee, 6(1)(e), (k), 6(2)
- used by shareholder, 15(5)
- used in employment
- • costs, 8(1)(j)
- zero-emission, *see* Zero-emission passenger vehicle; Zero-emission vehicle

Automotive equipment

- capital cost allowance, Reg. Sch. II:Cl. 10(a)
- • large trucks and tractors, Reg. Sch. II:Cl. 16(g)

Automotive painter

- apprenticeship job creation credit, 127(9)“investment tax credit”

Automotive service technician

- apprenticeship job creation credit, 127(9)“investment tax credit”

Available-for-use rules

- capital cost allowance, 13(26)–(32), 20(28), (29), Reg. 1100(2)
- • transfer of property to affiliated person, 13(21.2)(e)(iv)
- deduction against rental income, 20(28), (29)
- investment tax credit, 127(11.2)
- meaning of, 248(19)
- scientific research, 37(1.2)

Average Consumer Price Index

- defined, Reg. 8500(1)

“Average wage” for calendar year

- defined, 147.1(1)
- used in calculating money purchase limit, 147.1(1)“money purchase limit”

Averaging of income, *see also* Income-averaging annuity contract

- forward, *see* Forward averaging
- lump-sum payments, 110.2, 120.31
- RRSPs, 146(5), (8)
- • by pledging RRSP as security, 146(7), (10)
- shareholder loans, 15(2), 20(1)(j)

Aviation fuel, *see* Fuel tax rebate (1992–1999)**Avoidance of tax**, *see* Anti-avoidance rules**Avoidance transaction**

- defined
- • for general anti-avoidance rules, 245(3)
- • for reportable transaction rules, 237.3(1)
- reporting required, 237.3(2)

Award

- legal expenses of collecting salary, etc.
- • included in employee’s income, 6(1)(j)
- personal injury
- • election re capital gains, 81(5)
- • income exempt, 81(1)(g.1), (g.2)

Away-from-home expenses, *see also* Special work site, employment at; Travelling expenses

- railway employees, 8(1)(e)
- transport employees, 8(1)(g)

B**BAPA (Bilateral Advance Pricing Agreement)**, *see* Advance Pricing Agreement**BDC Capital Inc.**

- prescribed not to be a financial institution, Reg. 9000(b)

BEPS, *see* Base erosion and profit shifting, anti-avoidance rules**BHP Billiton-South32 spinoff**, Reg. 5600(j)**BIL**, *see* Business investment loss**BN**, *see* Business Number**BP Canada case overruled**, 237.5**Baby bonus**, *see* Canada Child Benefit**Babysitting**, *see* Child care expenses**Back-door butterfly**, 88(1)(c)(vi), 88(1)(c.3), 88(1)(c.8)**Backman case overruled**, 96(8)**Back-to-back loans**

- attribution rules, 74.5(6)
- loan by corporation to non-resident, 17(11.2)
- non-resident withholding tax, 212(3.1)–(3.81)
- shareholder loans, 15(2.16)–(2.192)
- thin capitalization rules, 18(6), (6.1)

Back-to-back royalties

- non-resident withholding tax, 212(3.9)–(3.94)

Bad debt

- change in control of corporation, limitation on deduction, 111(5.3)
- deductible, 20(1)(p)
- deemed disposition of, 50(1)(a)
- disposition of depreciable property, 20(4), (4.1)
- disposition of (former) eligible capital property, 20(4.2)
- insurer/moneylender
- • inclusion in income, 12.4
- personal-use property, 50(2)
- recovered
- • capital gain, 39(11)
- • income, 12(1)(i), (i.1)
- restrictive covenant payment, 60(f)
- uncollectible proceeds of disposition, 20(4)–(4.2)
- where property seized by creditor, no deduction for principal, 79.1(8)

Baker

- apprenticeship job creation credit, 127(9)“investment tax credit”

Balance

- defined, for consequential reassessment, 152(4.4)
- transfer of, to different CRA account, 221.2

Balance disorder

- pressure pulse therapy device for, medical expense credit, Reg. 5700(z.4)

Balance-due day

- amalgamated corporation, 87(2)(oo.1)
- defined, 248(1)
- • for trust’s year-end triggered by change in beneficiaries, 251.2(7)
- payment of tax by, 153(2), 155(1)(b), 156(1)(b), 156.1(1)“net tax owing”(b), 157(1)

Balance of annuitized voluntary contributions

- defined, 60.2(2)

Ballroom dancing relief (COVID), Reg. 8901.1(2)(b)(ix)(A)(V), *see also* Qualifying tourism or hospitality entity**Bank**, *see also* Financial institution

- account in foreign country, disclosure to CRA, 233.3
- cannot make Canadian securities election, 39(5)(b)
- defined, *Interpretation Act* s. 35(1)
- exempt from Part IV tax, 186.1(b)
- FAPI credit to offset Part XIII tax, 125.21
- FAPI rule flexibility, 95(2.31), (2.43)–(2.45), (3.01)
- foreign, *see* Authorized foreign bank; Foreign bank
- interference with remittance of tax, 227(5.2)–(5.4) (1995 draft, abandoned)
- liabilities of, determination for debt forgiveness reserve, 61.3(1)(b)C(ii)(B)
- mark-to-market rules, 142.2–142.6
- non-resident account reporting, *see* Common Reporting Standard
- offshore, whether income is FAPI, 95(1)“investment business”(a)(i), 95(2.11)
- receipt of tax payments by, 229 [repealed]

Bank (*cont'd*)

- remittance of source withholdings by large employers, 153(1), (1.4), Reg. 110
- Requirement for Information, electronic delivery of, 231.2(1.1)
- reserves
 - continuation of, on amalgamation, 87(2)(g.1)
 - prescribed reserve amount, Reg. 8000(a), (a.1)
- sperm, medical expense credit, 118.2(2)(v)
- taxable income earned in a province, Reg. 404

Bank for International Settlements

- no withholding tax on interest payable to, Reg. 806.1

Banker's acceptances

- included in capital for large corporations tax, 181.2(3)(d)
- interest taxable to holder, 12(1)(c)
 - annual accrual, 12(4), (9)
- qualified investments for deferred income plans, Reg. 4900(1)(i.2)

Bankruptcy

- Act, *see Bankruptcy and Insolvency Act*
- "bankrupt" defined, 248(1)
- business income, effect on, 34.1(8)(b)
- corporation
 - dividends paid to, effect on dividend refund, 129(1.1)
 - general rules, 128(1)
- debt forgiveness rules inapplicable, 80(1)"forgiven amount"B(i)
- effect on Crown's priority for taxes withheld, 227(5)
- "estate of the bankrupt" defined, 248(1)
- individual
 - Canada Child Benefit, 122.61(3.1)
 - credits allowed, 118.95
 - GST credit, 122.5(7)
 - general rules, 128(2)
 - minimum tax not applicable, 127.55
 - tuition and education credit carryforward, 128(2)(f)(iv), 128(2)(g)(ii)
- legislation, *see Bankruptcy and Insolvency Act*
- receiver
 - return to be filed by, 150(3)
 - minimum tax carryover not applicable, 120.2(4)
 - withholding tax, 227(5), (5.1)
- shares of corporation in, 50(1)
- trustee in, *see also* Legal representative
 - clearance certificate, 159(2)
 - deemed to be legal representative, 248(1)"legal representative"
 - obligations of, 159
 - return required by, 150(3)
 - withholding tax, liability for, 227(5), (5.1)(f)

Bankruptcy and Insolvency Act

- charge registered under, 223(11.1)
- priority of garnishment order over, 224(1.2)

Bare trust, 104(1), *see also* Agent

- requirement to disclose details to CRA, 150(1.3)

Barrister and solicitor, *see* Lawyer**Bars relief (COVID)**, Reg. 8901.1(2)(b)(ii), *see also* Qualifying tourism or hospitality entity**Base erosion and profit shifting, anti-avoidance rules**

- action items (2015), 95 (proposed amendments)
- country-by-country (CbC) reporting, 233.8
- cross-border rules, Canada-U.S. Tax Treaty:Art. XXIX-A:2(e)
- FAPI, 95(2)(a.1)–(b)
- hybrid mismatch arrangements, *see* Hybrid mismatch arrangement
- interest expense deduction
 - limited to 30% of EBITDA, 18.2, 18.21
 - thin capitalization, 18(4)–(8)
- limitation on benefits, Canada-U.S. Tax Treaty:Art. XXIX-A
- mandatory disclosure rules, 237.3–237.5

- purpose test, MLI Art. 7(1)
- thin capitalization, 18(4)–(8)
- transfer pricing, 247

Base level deduction

- real property corporations, 18(2.2)–(2.5)

Base percentage

- defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)

Base taxation year (for OAS clawback)

- defined, 180.2(1)

Base year

- defined, for transitional accounting rules
 - financial institution, 142.51(1)
 - life insurer, 138(12)
 - non-life insurer, 12.5(1), Reg. 2400(1)
- for corporate inclusion of partnership income shortfall
 - defined, 34.3(1)

Baseball players, *see* Athlete**Baseline remuneration**

- defined, for COVID-19 wage subsidy, 125.7(1)

Basic activity of daily living

- defined, 118.4(1)(c), (d)
- markedly restricted, disability credit, 118.3(1)

Basic education, *see* Adult basic education**Basic herd**

- meaning of, 29(3)
- reduction in, 29(2)
- election re, 29(1)

Basic oxygen furnace gas

- defined, Reg. 1104(13)

Bathtub

- mechanical aid for getting into and out of, medical expense, Reg. 5700(g)

Beament case overruled, 250(1)(b)**Bearer bond etc.**

- coupon encashment requiring ownership certificate, 234
- withholding tax on payments to non-resident, 215(2)

Becoming a financial institution, 142.6(1)(a), (b)**Becoming non-resident**, *see* Ceasing to be resident in Canada**Becoming resident in Canada**, 128.1(1)

- corporation
 - deemed dividends, 128.1(1)(c.1), (c.2)
 - effect on non-resident shareholder's cost, 52(8)
 - foreign affiliate of Canadian resident, 128.1(1)(d)
 - paid-up capital, effect on, 128.1(2), (3)
- deemed acquisition of property, 128.1(1)(c)
- deemed disposition of property, 128.1(1)(b)
- foreign affiliate, Reg. 5907(13)–(15)
- immigration trust, five-year non-taxability, *see* Immigration trust
- partner
 - cost base of properties owned by partnership, 96(8)
 - taxation year-end and new taxation year, 128.1(1)(a)

Bed

- hospital, medical expense, Reg. 5700(h)
- reservation fee, for foster person, exempt, 81(1)(h)
- rocking, medical expense, 118.2(2)(i)

Bed & breakfast relief (COVID), Reg. 8901.1(2)(b)(i), *see also* Qualifying tourism or hospitality entity**Bees**

- keeping, constitutes farming, 248(1)"farming"

Behind-the-counter drugs, Reg. 5701**Belgium**, *see also* Foreign government

- film or video under treaty co-production, Reg. 1106(3)(f)
- stock exchange recognized, 262
- universities, gifts to, Reg. Sch. VIII, s. 5

“Beneficially interested” in a trust

- meaning of, 248(25)

Beneficiary

- amounts deemed not paid to, 104(13.1), (13.2)
- amounts deemed payable to, 104(24), (29)
- arm’s length from personal trust, deemed not to be, 251(1)
- capital cost allowance, deduction for, 104(16) [repealed]
- death of
 - separate return on, 104(23)(d)
- deemed income of, 104(27), (28)
- deferred profit sharing plan, under, 147(17)
 - when plan was employees’ profit sharing plan, 147(11)
- defined, 18(5), 94(1), 108(1), 122(3), 248(13), 251.1(3), 251.2(1), Reg. 8500(1)
- disposing of property previously held by trust
 - reduction of loss, 107(6)
- emigration of, 128.1(10)“excluded right or interest”(j), (k)
- employees profit sharing plan, under, 144(6)–(8)
 - former, refund to, 144(9)
- foreign tax credit, 104(22)–(22.4)
- immigration of, 128.1(10)“excluded right or interest”(j), (k)
- income of, 108(5)
- income payable to, 104(13)
- non-resident
 - distribution of property to, 107(5)
 - instalment obligation not increased, 107(5.1)
 - security to postpone payment of tax, 220(4.6)–(4.63)
 - dividends received on behalf of, 82(1)(e)
 - estate income paid to, withholding tax, 212(1)(c)
 - limitation on deduction in computing income of trust, 104(7)
 - trust income paid to, withholding tax, 212(1)(c)
- non-taxable dividends, designation re, 104(20)
- preferred
 - defined, 108(1)
 - election re accumulating income, 104(14)
- qualifying environmental trust, credit for, 127.41
- registered education savings plan, under, 146.1(1)“beneficiary”
- rights or things transferred to, 70(3)
- share of pension etc. benefits received by estate, 104(27)–(28)
- superannuation or pension benefit, share of, 104(27)
- taxable capital gain, designation by trust, 104(21)–(21.7)
- taxable dividends received by trust, designation re, 104(19)
- trust, of
 - defined, 108(1)“beneficiary”
 - depreciable property acquired with government assistance, 13(7.2)
 - inducement payments or reimbursement received by, 12(2.1)
 - to be reported to CRA starting 2022, Reg. 204.2(1)(a)

Benefit

- automobile available to shareholder, 15(5), (7)
- automobile operation, re, 6(1)(a)(iii), 6(2.2)
- conferred on person
 - amount included in income, 56(2), 246(1)
 - by charity, *see* Undue benefit
- conferred on shareholder, 15(1), (7), (9)
 - loan forgiven, 15(1.2)
- death, *see* Death benefit
- deferred profit sharing plan, under, 147(10)–(10.2)
 - defined, 248(1)
- defined
 - Home Buyers’ Plan, 146.01(1)
 - Lifelong Learning Plan, 146.02(1)
 - policy reserves in insurance business, Reg. 1408(1)
 - registered retirement savings plan, 146(1)“benefit”
- employee benefit plan, 6(1)(g)
- employment, related to, 6(1)(a)
- automobile, 6(1)(e), (k), 6(2)

- exclusions from income, 6(1)(a)(i)–(v)
- GST included in benefit, 6(7)
- group term life insurance, 6(1)(a)(i), 6(4), Reg. 2700–2704
- housing loss, 6(19)–(22)
- housing subsidy, 6(23)
- loan to employee, 6(9)
- loss in value of home on relocation, 6(19)–(22)
- scholarship for employee’s relatives, 6(1)(a)(vi)
- stock options, 7
- employment insurance, 6(1)(f)
- forgiveness of debt
 - owing by employee, 6(15), (15.1)
 - owing by shareholder, 15(1.2), (1.21)
- government assistance program, prescribed
 - overpayment repaid, deductible, 60(n)(v)
 - taxable, 56(1)(a)(vi), Reg. 5502
- group term life insurance premium, portion taxable, 6(4)
- indirect, 56(2)
- information returns, Reg. 200
- loan to employee, officer or personal services corporation, 80.4(1)
 - deemed interest, 80.5
 - loan to personal services business
 - included in income, 12(1)(w)
 - loan to shareholder, 80.4(2)
 - deemed shareholder benefit, 15(9)
- northern and isolated areas
 - credit, 110.7
 - prescribed northern zone and intermediate zone, Reg. 7303.1
- paid to non-resident, 212(1)(j)
- prescribed, *see* Prescribed benefit
- provision, *see* Benefit provision
- registered disability savings plan
 - tax on, 206.2(2)(a)
- registered national arts service organization, from, 56(1)(z.1)
- registered retirement savings plan, under, 146(8)–(8.91)
 - defined, 146(1)“benefit”
- retirement savings, 146.3(5)
- shareholders’, taxable, 15(1), (7), (9)
- stock dividend paid, 15(1.1)
- superannuation or pension, 56(1)(a)
 - defined, 248(1)
- trust, estate, contract, etc., from, 12(1)(m), 105(1)
- unemployment insurance
 - repayment of, 110(1)(i)

Benefit on death

- defined, Reg. 310, 1401(3)

Benefit provision

- defined, Reg. 8500(1)

Benevolent or fraternal benefit society, *see also* Non-profit organization

- exemption, 149(1)(k)
- limitation, 149(3), (4)

Bequest, *see also* Death of taxpayer

- debt forgiveness rules do not apply, 80(2)(a)
- to charity, 149.1(1)“enduring property”(a)

Bermuda, *see also* Foreign government

- stock exchange recognized, 262

Betting losses, Canada-U.S. Tax Treaty:Art. XXII:3**Beverages**

- expenses for, *see* Entertainment expenses (and meals)

Bifurcating an appeal, 171(2)**Bijuralism**

- legislation to apply to both common law and civil law, *Interpretation Act*, ss. 8.1, 8.2

Bilateral convention, *see* Tax treaty**Bill, post-dated, sale of, 20(1)(e), 248(1)“borrowed money”**

Billed-basis accounting

- transition to accrual accounting for professionals 2017–20, 10(14.1), 34

Biogas

- defined, Reg. 1104(13)
- production equipment, capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xiii), 43.2(b)

Bio-oil

- defined, Reg. 1104(13)
- equipment, capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xi), 43.2(b)
- included in eligible waste fuel, Reg. 1104(13)“eligible waste fuel”

Bison, 80.3(1)“breeding animals”**Bitumen development phase**

- defined, Reg. 1104(2)

Bitumen mine development project

- defined, 66.1(6)

Bitumen upgrading development project

- defined, 66.1(6)

Bituminous sands

- constitutes tar sands, 248(1)“tar sands”
- defined, 248(1)
- deposit, exploration for
 - excluded from CEE, 66.1(6)“Canadian exploration expense”(g), (g.2)
 - excluded from CRP, 66(15)“Canadian resource property”(b)(ii), (e), (f)
- determination of viscosity and density, Reg. 1107
- well for, is not oil or gas well, 248(1)“oil or gas well”

Bituminous sands, included in definition of “mineral”, 248(1)**Bituminous sands equipment**

- defined, Reg. 1206(1)
- proceeds of disposition, 59(3.3)(c)

Black liquor, *see* Spent pulping liquor**Blackburn Radio case overruled**, 152(4)(b)(iii)(B)**Blast furnace gas**

- defined, Reg. 1104(13)

Blended payment, interest and principal, 16(1)

- paid to non-resident, 214(2)

Blind person, *see also* Mental or physical impairment

- Braille note-taker
- disability supports deduction, 64(a)A(ii)(O)
- medical expense credit, Reg. 5700(y)
- computer-operating aids
 - disability supports deduction, 64(a)A(ii)(C)
 - medical expense, Reg. 5700(o)
- deaf-blind intervening services
 - disability supports deduction, 64(a)A(ii)(M)
 - medical expense credit, 118.2(2)(1.44)
- devices to assist, business expense, 20(1)(tr)
- guide dog, expenses, 118.2(2)(l)
- parking paid by employer, not taxable benefit, 6(16)
- print-reading aids
 - disability supports deduction, 64(a)A(ii)(D), (Q)
 - medical expense credit, Reg. 5700(l), (1.1)
- reading services
 - disability supports deduction, 64(a)A(ii)(L)
 - medical expense credit, 118.2(2)(1.43)
- transportation paid by employer, not taxable benefit, 6(16)

Bliss symbol board

- disability supports deduction, 64(a)A(ii)(N)
- medical expense credit, Reg. 5700(x)

Block of shares

- defined, Reg. 4803(1)

Block of units

- defined, Reg. 4803(1)

Blocked currency

- FAPI reserve, 91(2)
- income in, postponement of tax, 161(6)

Blocking deficits (FAPI)

- anti-avoidance rules, Reg. 5905(7.1)–(7.7)

Blood coagulation monitor

- medical expense credit, Reg. 5700(s.1)

Blood relationship

- defined, 251(6)

Blood sugar

- measuring device for diabetics, medical expense, Reg. 5700(s)

Board and lodging

- railway employees, 8(1)(e)
- special work site, 6(6)
- transport employees, 8(1)(g)
- value of, includable in income, 6(1)(a)

Board of trade

- exemption, 149(1)(e), 149(2)
- information return, whether required, 149(12)

Boat

- cost over \$250,000, *see* Luxury Items Tax

Boat harbour relief (COVID), Reg. 8901.1(2)(b)(ix)(A)(III), *see also* Qualifying tourism or hospitality entity**Boilermaker**

- apprenticeship job creation credit, 127(9)“investment tax credit”

Bond, *see also* Debt obligation; Investment contract; Obligation; Specified debt obligation

- accrued interest
 - information return, Reg. 211
 - treatment of, 20(14)
- bearer, *see* Bearer bond etc.
- Canadian Government, 212(1)(b)(ii)
- conversion of, 51.1; ITAR 26(25)
- convertible, exchanged for share, 51
- cost base, additions to, 53(1)(g)
- coupon identification, 240(2)
- credit-related gains and losses, 142.4(7)B
- discount
 - deduction for, 20(1)(f)
 - limitation on deductibility of payments on, 18(1)(f)
 - when deemed to be interest, 16(3)
- expropriation assets for sale of foreign property, 80.1
- foreign corporation, eligible for RRSP investment, Reg. 4900(1)(p)
- foreign government, qualified investment for RRSP etc., 204“qualified investment”(c.1) (formerly Reg. 4900(1)(o))
- identical properties
 - disposition of, 47(2)
 - meaning, 248(12)
- income
 - defined, 248(1)
 - foreign affiliate, issued by, 95(5)
 - interest on, deemed dividend, 15(3)
 - non-resident corporation, 15(4)
 - issued at discount, yield treated as interest, 16(3)
 - predecessor corporation, of, 87(6), (7)
 - premium, reserve, *see* Reserve: unamortized bond premium
 - provincial, taxable at reduced rate, 212(6)–(8)
 - purchase of on open market, by issuer, 39(3)
 - reserve for unamortized premium, *see* Reserve: unamortized bond premium
 - sale of, 20(21)
 - small business, *see* Small business bond
 - small business development, *see* Small business development bond
 - stripped, cost of coupon excluded from income when sold, 12(9.1)

- Bond (*cont'd*)
- transferred, interest on, 20(14)
- Bone marrow transplant**
- expenses of, tax credit for, 118.2(2)(1.1)
- Bonus**, *see also* Signing bonus
- cash, Canada Savings Bond, 12.1
 - • information return, Reg. 220
 - employment
 - • unpaid, 78(4)
 - • withholding of tax at source, 153(1)(a), Reg. 103
- Bonus interest payment**
- credit union, by
 - • deduction, 137(2)
 - • defined, 137(6)
- Bonus payments**
- employees, 5(1) (taxes as salary)
- Book**
- capital cost allowance for, Reg. Sch. II:Cl. 12(a)
 - talking textbook, medical expense, *see* Talking textbooks
- Bookkeeping services**
- penalty for misrepresentation, 163.2(9)
- Books and records**, *see also* Documents
- destruction of, penalty, 239(1)
 - inspections, 231.1
 - outside Canada, 143.2(13), (14), 231.6
 - political contributions, 230.1
 - required to be kept, 230(1)
 - • electronic records, 230(4.1), (4.2)
 - • failure to keep, 230(3)
 - • • offence and penalty, 238(1)
 - • lawyers, 230(2.1)
 - • registered Canadian amateur athletic association, 230(2)
 - • registered charity, 230(2)
 - • retention of, 230(4)–(8), Reg. 5800
 - transfer pricing, 247
 - transfer pricing, for, contemporaneous, 247(4)
- Boot**, *see* Non-share consideration (boot)
- Border residents**, *see* Commuter to United States
- Borrowed money**, 20(2), (3)
- costs, capitalized, 21
 - defined, 248(1)
 - depreciable property, for, 21(3)
 - • election to capitalize, 21(1)
 - exploration/development, for, 21(4)
 - extended meaning of, 20(2), (3)
 - interest paid on, 20(1)(c)
 - loss of source of income, 20.1(1)
 - purposes used for, deemed, 20(2), 20(3), 20.1
 - refinanced, 20.1(6)
 - used to acquire partnership interest, 20.1(5)
 - used to invest in RRSP, RESP or TFSA, no deduction for interest, 18(11)
- Borrowing**
- allocations in proportion to
 - • deduction, 137(2)
 - • defined, 137(6)
 - expense of, 20(1)(e)
- Borrowing party**
- defined, for upstream loan transitional rules, 39(2.1)
- Bosnia**
- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(a) [repealed]
- Botanical gardens relief (COVID)**, Reg. 8901.1(2)(b)(iv), *see also* Qualifying tourism or hospitality entity
- Bottle deposits**
- taxable as income, 12(1)(a)(ii)
 - • deduction when repaid, 20(1)(m.2)
- Bounced cheque**, *see* Cheque: dishonoured
- Bounty payments**, *see* Informant payments
- Bourse de Montréal Inc.**
- prescribed securities exchange investment, Reg. 9002.2(d)
- Bovine animals**
- breeding, 80.3(1)“breeding animals”
 - inventory, valuation of, 28(1.2)
- Brace (limb or spinal), as medical expense**, 118.2(2)(i)
- Brady bond**
- excluded from mark-to-market rules, 142.2(1)“mark-to-market property”(e), Reg. 6209(b)(i), 9002(1)(d)
 - reserve in respect of, Reg. 8006“specified loan”
- Braille note-taker**
- disability supports deduction, 64(a)A(ii)(O)
 - medical expense credit, Reg. 5700(y)
- Braille printer**
- disability supports deduction, 64(a)A(ii)(C)
 - medical expense credit, Reg. 5700(o)
- Brambles-Recall spinoff**, Reg. 5600(i)
- Branch advance**
- defined, 20.2(1)
- Branch financial statements**
- Canadian income of foreign bank calculated using, 115(1)(a)(ii)
 - defined, 20.2(1)
- Branch interest tax**, 218.2
- Branch tax**, 219
- exemption for first \$500,000 of profits, Canada-U.S. Tax Treaty:Art. X:6(d)
 - investment allowance, Reg. 219(1)(j), 808
 - non-resident investment or pension fund, exclusion, 115.2
 - tax treaty dividend rate limitation to apply, 219.2
- Brant case overruled**, 224(1.4), 227(4.3)
- Breakdown of marriage**, *see* Divorce and separation
- Breakwater**
- capital cost allowance for, Reg. Sch. II:Cl. 3, Sch. II:Cl. 6
- Breast prosthesis**
- medical expense, Reg. 5700(j)
- Breeding animals/herd**
- defined, 80.3(1)
- Breeding bee stock**
- defined, 80.3(1)
 - tax deferral in drought or flood regions, 80.3(4.1)
- Breeding bees**, *see also* Breeding bee stock
- defined, 80.3(1)
- Bribes**
- no deduction for, 67.5
- Bricklayer**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Bridge**
- capital cost, 13(7.5)(b), Reg. 1102(14.3)
 - capital cost allowance for, Reg. Sch. II:Cl. 1(a)
- Bridging benefits**
- employment insurance income replacement benefits, 56(1)(r)(iv)
 - pension income credit, 118(8.1)
 - pensions, defined, Reg. 8500(1)
- Britain**, *see* United Kingdom
- British Columbia**, *see also* Province
- Forestry Revitalization Trust, *see* Forestry Revitalization Trust
 - labour-sponsored venture capital corporation of
 - • prescribed, Reg. 6700(a)(vi), (x), Reg. 6700.1
 - logging tax, credit for, 127(1), (2), Reg. 700

- British Columbia (*cont'd*)
 - Mackenzie, northern resident deduction, Reg. 7303.1(2)(a)
 - northern, *see* Northern Canada
 - tax rates, *see* introductory pages
 - Vancouver, international banking centre until 2013, 33.1(3)
- British Commonwealth**
 - defined, *Interpretation Act* 35(1)
- Broad participation retirement fund**
 - defined, for Common Reporting Standard, 270(1)
- Broadcaster**
 - prescribed person for Canadian film/video tax credit, Reg. 1106(7)
- Broadcasting**
 - defined, *Interpretation Act* 35(1)
 - royalties paid to U.S. resident, Canada-U.S. Tax Treaty:Art. XII:3(d)
- Broadcasting undertaking**
 - foreign, defined, 19.1(4)
 - limitation re advertising expenses, 19.1(1)
- Broker**, *see also* Registered securities dealer; Securities: dealer, trader or agent
 - dividend received by
 - withholding tax, 153(4), (5)
 - insurance, reserve for, 32(1)
- Brother**
 - deemed not related on butterfly transaction, 55(5)(e)
 - dependent, 118(6)(b)
 - includes brother-in-law or in common-law, 252(2)(b)
 - sharing of RESP assets, 204.9(5)(c)(ii)
- Buccini case overruled**, 7(1.7)
- Budget surplus**
 - personal income tax cuts, 118(3.1)–(3.3) (Notes)
- Building**
 - additions/alterations
 - capital cost allowance, Reg. Sch. II:Cl. 3, Sch. II:Cl. 6(i), Sch. II:Cl. 6(k)
 - class of property acquired, Reg. 1102(19)
 - disability-related
 - deductible, 20(1)(qq)
 - medical expense credit, 118.2(2)(l.2)
 - capital cost allowance for, Reg. Sch. II:Cl. 1(q), Sch. II:Cl. 3, Sch. II:Cl. 6(a), Sch. II:Cl. 8
 - manufacturing or processing, used in, Reg. 1100(1)(a.1)
 - non-residential, additional allowance, *see* Eligible non-residential building
 - construction, capitalization of soft costs, 18(3.1)–(3.7)
 - deduction before available for use, 20(28), (29)
 - mine, capital cost allowance, Reg. Sch. II:Cl. 10(g), Sch. II:Cl. 41
 - multiple-unit residential, Reg. 1101(5b)
 - separate classes for capital cost allowance, Reg. 1101(5b)
 - non-residential, *see* Eligible non-residential building
 - proceeds of disposition allocated between land and, 13(21.1), 70(5)(d)
 - rent paid before acquisition, deemed CCA, 13(5.2)
 - rental properties, limitation on CCA, Reg. 1100(11)–(14.2)
 - scientific research expenditures, limitations, 37(8)(d)(i), (ii), Reg. 2900(11)
 - scientific research expenditures on, 37(8)(d)
 - separate class
 - multiple-unit residential building (acquired by 1987), Reg. 1101(5b)
 - rental property costing over \$50,000, Reg. 1101(1ac)–(1ae)
 - where non-residential use, Reg. 1101(5b.1), *see* Eligible non-residential building
 - separate class, where cost over \$50,000, Reg. 1101(1ac), (1ad), (5b)
 - special-purpose, defined, Reg. 2903
 - when available for use, 13(28)
- Bump**
 - denial rule, 88(1)(c)(vi)
 - of asset costs, on windup of corporation, 88(1)(d)
 - amendment to bump designation, 88(1.8), (1.9)
- Burden of proof**
 - on Minister
 - failure to report capital gain resulting in denial of exemption, 110.6(6)
 - penalty, 163(3)
 - on taxpayer challenging assessment, 152(7)
- Burial services**, *see* Eligible funeral arrangement; Funeral services
- Bursary**, *see* Scholarship
- Bus and truck operators**
 - allocation of income among provinces
 - corporation, Reg. 409
 - individual, Reg. 2604
- Bus driver**
 - expenses, 8(1)(g)
- Buses (charter) relief (COVID)**, Reg. 8901.1(2)(b)(vii), *see also* Qualifying tourism or hospitality entity
- Business**, *see also* Adventure in the nature of trade; Business or property income
 - adjustment time, defined, 14(5) [before 2017]
 - carrying on in Canada
 - extended meaning of, 253
 - losses, *see* Non-capital loss; Loss(es)
 - non-residents, 2(3)
 - cessation, *see* Ceasing to carry on business
 - defined, 248(1)
 - disposition of by proprietor, 25
 - expansion, 44(1), (5)
 - expenses, *see* Expenses
 - farming or fishing, 28
 - income from, *see also* Business or property income
 - defined, 9(1)
 - earned in a province, Reg. 2603
 - limitations, Reg. 2606
 - home office expenses, conditions for deductibility, 18(12)
 - more than one business, Reg. 2605
 - limit, *see* Business limit
 - losses, *see* Non-capital loss; Loss(es)
 - more than one
 - income earned in a province, Reg. 2605
 - profits, 9(1), Canada-U.S. Tax Treaty:Art. VII
 - proprietor's income from, 11(1)
 - separate, *see* Separate business
 - small, *see* Small business corporation
 - termination of, *see* Ceasing to carry on business
 - transfer of, to corporation or spouse, 24(2)
- Business corporation, foreign**, *see* Foreign business corporation
- Business Development Bank of Canada**
 - prescribed not to be a financial institution, Reg. 9000(a)
- Business entity**
 - defined, for country-by-country reporting, 233.8(1)
- Business-income tax (foreign)**
 - deduction for, 126(2), (2.1)
 - defined, 126(7)
 - for trusts, 104(22.4)
- Business investment loss**
 - allowable, *see also* Allowable business investment loss
 - carryforward, 111(1)(a), 111(8)“non-capital loss”
 - deduction for, 3(d)
 - bad debt, 50(1)(a)
 - change of control of corporation, rules, 111(8)“net capital loss”C(b)

- Business investment loss (*cont'd*)
 - deduction from, 39(9), (10)
 - meaning, 39(1)(c)
 - shares of bankrupt corporation, 50(1)(b), 50(1.1)
 - Business limit**
 - anti-avoidance rule, 125(9)
 - assignment of, to another corporation, 125(3.1), (3.2)
 - defined, 125(2)–(5.1), 248(1)
 - effect on enhanced investment tax credit, 127(10.2), 127.1(2)“qualifying corporation”
 - large corporation, 125(5.1)(a)
 - limits small business deduction, 125(1)(c)
 - Business Number**, *see also* Social insurance number
 - defined, 248(1)
 - disclosure to public, 241(9.3), (9.4)
 - holder of, disclosure of information to other governments, 241(4)(l)
 - other governments required to use to permit disclosure of information, 241(9.2)
 - penalty for failure to provide, 162(6)
 - provision of, to provinces and other government departments, 241(4)(l)
 - regulations requiring provision of, 221(1)(d.1)
 - requirement to provide, 237(1.1), (2)
 - tax shelter information return, 237.1(7)
 - Business or property income**, 12
 - accrued interest on debt obligation, 12(3), (4), (9)
 - amounts received for services to be rendered etc., 12(1)(a), 12(2)
 - automobile provided to partner, 12(1)(y)
 - bad debts recovered, 12(1)(i), (i.1)
 - benefits from estates, trusts, etc., 12(1)(m)
 - deductions from
 - not allowed, 18
 - permitted, 20(1)
 - dividends, 12(1)(j), (k)
 - eligible capital amount to be included, 14(1) [before 2017]
 - employee benefit plan
 - amounts received from, 12(1)(n.1)
 - employee trust, amounts received, 12(1)(n)
 - employees profit sharing plan, amounts received from, 12(1)(n)
 - employment tax deduction, 12(1)(q)
 - energy conversion grant, 12(1)(u)
 - forfeited amounts under salary deferral arrangements, 12(1)(n.2)
 - home insulation grant, 12(1)(u)
 - inducement payments, 12(1)(x)
 - prescribed amount, Reg. 7300
 - received by beneficiary of trust, or partner, 12(2.1)
 - insurance proceeds expended, 12(1)(f)
 - interest, 12(1)(c)
 - inventory adjustment, 12(1)(r)
 - investment tax credit, 12(1)(t)
 - life insurance policies, accumulating fund, 12.2
 - partnership, 12(1)(l)
 - payments based on production or use, 12(1)(g)
 - personal services business
 - loan from employer, 12(1)(w)
 - reimbursement, 12(1)(x)
 - prescribed amount, Reg. 7300
 - received by beneficiary of trust, or partner, 12(2.1)
 - reserves
 - certain goods and services, for, 12(1)(e)
 - doubtful debts, for, 12(1)(d)
 - guarantees etc., for, 12(1)(d.1)
 - quadrennial survey, for, 12(1)(h)
 - retirement compensation arrangement, amounts received under, 12(1)(n.3)
 - scientific research deduction, 12(1)(v)
 - services rendered, amounts receivable for, 12(1)(b), 12(2)
 - western grain stabilization payments, 12(1)(p)
 - Business property**, *see* Former business property
 - Butterfly denial rules**, 55(3.1)
 - Butterfly transaction**, 55(3)(b)
 - back-door rule, 88(1)(c)(vi), 88(1)(c.3), 88(1)(c.8)
 - capital gains exemption disallowed, 110.6(7)(a)
 - definitions, 55(1)
 - excluded from capital gains strip rules, 55(3)(b)
 - exception for purchase butterfly, 55(1)“permitted exchange”, (3.1), (3.2)
 - no acquisition of control on spin-off distribution, 256(7)(a)(i)(E)
- ## C
- CAI (Climate Action Incentive)**, 122.8
 - CAIS**, *see* Canadian Agricultural Income Stabilization program
 - CCA**, *see* Capital cost allowance
 - CCB**, *see* Canada Child Benefit
 - CCDE**, *see* Cumulative Canadian development expense
 - CCOGPE**, *see* Cumulative Canadian oil and gas property expense
 - CCPC**, *see* Canadian-controlled private corporation
 - CCPC rate reduction percentage**
 - defined, 123.4(1)
 - CCRA (Canada Customs & Revenue Agency)**, *see* Canada Revenue Agency
 - CCT**, *see* Character conversion transaction
 - CCTB [Canada Child Tax Benefit]**, *see* Canada Child Benefit
 - CCUS**, *see* Carbon capture, utilization and storage
 - CD**, *see* Audio tapes or CDs
 - CDA**, *see* Capital dividend account
 - CDE**, *see* Canadian development expense
 - CDS Innovations Inc.**
 - website postings required by publicly traded partnerships, Reg. 229.1
 - website postings required by publicly traded trusts, Reg. 204.1
 - CDSB**, *see* Canada Disability Savings Bond
 - CDSG**, *see* Canada Disability Savings Grant
 - CEC**, *see* Cumulative eligible capital
 - CEDC**, *see* Community Economic Development Corporation (Nova Scotia)
 - CEDOE**, *see* Canadian exploration and development overhead expense
 - CEE**, *see* Canadian exploration expense
 - CERB**, *see* Canada Emergency Response Benefit (CERB)
 - CERS**, *see* Canada Emergency Rent Subsidy
 - CESG**, *see* Canada Education Savings Grant
 - CEWS**, *see* Canada Emergency Wage Subsidy (CEWS)
 - CFA**, *see* Cash flow adjustment; Controlled foreign affiliate
 - CFVPC**, *see* Canadian film or video production certificate
 - CIF**, *see* Canadian investment fund
 - CIDA**, *see* Canadian International Development Agency
 - CMETC**, *see* Critical Mineral Exploration Tax Credit
 - CNIL**, *see* Cumulative net investment loss
 - COGPE**, *see* Canadian oil and gas property expense
 - COIN**, *see* Canadian option interest note
 - COVID-19**
 - air quality improvement credit, 127.43
 - automobile operating expenses relief, 6(2.2)
 - automobile standby charge relief, 6(2.3)
 - Canada Emergency Rent Subsidy, 125.7(2.1)
 - Canada Emergency Wage Subsidy, 125.7(2) (*see* Canada Emergency Wage Subsidy (CEWS))

COVID-19 (*cont'd*)

- child care expense need not be to earn income, 63(3.1)(a)
- deferred salary leave plan relief, Reg. 6801.1
- disability supports deduction need not be to earn income, 64.01(a)
- earned income for child-care and disability support includes COVID-19 support, 63(3.1)(b), 64.01(b)
- emergency Child Tax Benefit for May 2020, 122.61(1.01)
- emergency GST Credit for 2020, 122.5(3.001)
- emergency wage subsidy for employers
 - 10% (applied to source withholdings), 153(1.02)–(1.04)
 - 75% (paid by CRA), 125.7 (*see* Canada Emergency Wage Subsidy (CEWS))
- employee benefits, 6(1)(a) (Announced Administrative Change)
- flow-through share rules extensions, 66(12.6001), (12.731), 211.91(2.1)
- home office expenses, 8(13) (Announced Administrative Change)
- lockdown support, 125.7(2.1B)
- reduced minimum amount
 - for RRIF, 146.3(1.4), (1.5)
 - for variable benefits under pension plan, Reg. 8506(7.1)
- registered pension plan relief
 - borrowing permitted, Reg. 8502(i.1)
 - eligible period of reduced pay, Reg. 8500(1.3)
 - retroactive benefits for 2019, Reg. 8308(4.1)
 - retroactive contributions for 2019, Reg. 8308(5.1)
 - retroactive contributions for 2020–21, Reg. 8308(5.2), (5.3)

CPI (Consumer Price Index) adjustment, *see* Indexing (for inflation)

CPP, *see* Canada Pension Plan / Quebec Pension Plan

CRA, *see* Canada Revenue Agency

CRB, *see* Canada Recovery Benefit (CRB)

CRCB, *see* Canada Recovery Caregiving Benefit

CRCE, *see* Canadian renewable and conservation expense

CRHP, *see* Canada Recovery Hiring Program

CRIC

- defined [corporation resident in Canada], 15(2.11), 212.3(1), 219.1(2)(c)

CRTC, *see* Canadian Radio-television and Telecommunications Commission

CSIS, *see* Canadian Security Intelligence Service

CSM, *see* Contract service margin

CSOH, *see* Pre-1972 capital surplus on hand

CSST payment, *see* Workers' compensation payment

CTSP, *see* Computer tax shelter property

CUEC, *see* Cumulative unused excess capacity

CWLB, *see* Canada Worker Lockdown Benefit

CWB, *see* Canada Workers Benefit; Canadian Wheat Board

Cabinetmaker

- apprenticeship job creation credit, 127(9)“investment tax credit”

Cable

- fibre optic, capital cost allowance, Reg. Sch. II:Cl. 42
- included in definition of “telecommunication”, *Interpretation Act* 35(1)
- systems interface equipment, Reg. Sch. II:Cl. 10(v)

Caisse populaire, *see* Credit union

Calcium chloride

- extraction of, 248(1)“mineral resource”(d)(ii)
- included in definition of “mineral”, 248(1)

Calculating currency

- defined, for FAPI rules, 95(1)

Calculation period

- defined, 20.2(1)

Calendar year

- defined, *Interpretation Act* 37(1)(a)
- taxation year described by reference to, 249(1.1)

Camp, expenses of

- deductible as child care expenses, 63(3)“child care expense”
- not deductible, 18(1)(i)

Campsites relief (COVID), Reg. 8901.1(2)(b)(x)–(xii), *see also* Qualifying tourism or hospitality entity

Canada

- defined, 255, *Income Tax Conventions Interpretation Act* 5, *Interpretation Act* 35(1), Canada-U.S. Tax Treaty:Art. III:1(a)
- application to continental shelf, *Interpretation Act* s. 8(2.2)
- application to exclusive economic zone, 37(1.3), *Interpretation Act* s. 8(2.1)
- government of, *see* Government
- incorporated in, defined, 248(1)“corporation”, “corporation incorporated in Canada”
- resident of, *see* Resident of Canada

Canada Caregiver Credit (infirm adult dependant), 118(1)B(d)

Canada Child Benefit, 122.6–122.63, *see also* Universal Child Care Benefit (pre-July 2016)

- agreement with province to vary amount, 122.63
- amount of, 122.61(1)
- attribution rules inapplicable to amounts paid, 74.1(2)
- change in spousal status, notice to CRA required, 122.62(5)–(8)
- confidentiality of information, 241(4)(j.2)
- definitions, 122.6
- eligible individual, 122.6, 122.62, Reg. 6300–6302
- not to be assigned, attached, garnished, etc., 122.61(4)
- overpayment of, 160.1(1)
- no interest on, 160.1(1)(b), 160.1(3)
- part-year residents, 122.61(3)
- reversionary trust rules inapplicable to amounts put in trust, 75(3)(d)
- young child supplement, 122.61(1.2)

Canada Child Tax Benefit, *see* Canada Child Benefit

Canada Customs and Revenue Agency, *see* Canada Revenue Agency

Canada Deposit Insurance Corporation, *see also* Deposit insurance corporation

- bonds, etc. issued by
- interest deemed not from Government of Canada, 212(15)
- subject to tax, 27(2), Reg. 7100

Canada Disability Savings Act, *see also* Registered disability savings plan (RDSP)

- amounts paid under, 146.4(4)(n)
- Canada Disability Savings Bond, 7
- Canada Disability Savings Grant, 6
- disclosure of information for administration of, 241(4)(d)(vii.5)
- repayment of RDSP amount under, deductible, 60(z)
- text of, 146.4 (Notes)

Canada Disability Savings Bond, *see* Canada Disability Savings Act

Canada Disability Savings Grant, *see* Canada Disability Savings Act

Canada Education Savings Act

- disclosure of information for purposes of administration of, 241(4)(d)(vii.1)
- grant under, *see* Canada Education Savings Grant
- revocation of RESP for failure to comply with, 146.1(12.1)
- text of, 146.1 (Notes)

Canada Education Savings Grant

- not a contribution to RESP, 146.1(1)“contribution”
- repayment of, deduction, 60(x)

Canada Elections Act

- candidates and parties under

Canada Elections Act (cont'd)

- political contribution credit, 127(3)
- records re monetary contributions, 230.1

Canada Emergency Rent Subsidy, 125.7(2.1)

- amalgamation, effect of, 87(2)(g.6)
- assessment or determination of, 152(1)(b), 152(3.4)
- disclosure of claimant names to public, 241(3.5)
- lockdown support, 125.7(2.1)B
- penalty for amount overclaimed, 163(2)(i), 163(2.901)
- sale of business, effect of, 125.7(4.1), (4.2)
- subsidy can be paid by CRA at any time, 164(1.6), (1.61)

Canada Emergency Response Benefit (CERB)

- disclosure by CRA for purposes of administration, 241(4)(d)(vii.6)
- included in income, 56(1)(r)(iv), (iv.1)
- repayment of, deductible, 60(n), (v.3)

Canada Emergency Student Benefit (CESB)

- repayment of, deductible, 60(n), (v.3)
- taxable, 56(1)(r)(iv), (iv.1)

Canada Emergency Wage Subsidy (CEWS), 125.7, Reg. 8901.1, 8901.2

- amalgamation, effect of, 87(2)(g.6)
- assessment or determination of, 152(1)(b), 152(3.4)
- cannot claim both CRHP and CEWS, 125.7(9.2)
- disclosure of employer names to public, 241(3.5)
- dividends paid, disqualifies company, 125.7(2.01)
- penalty for amount overclaimed, 163(2)(i), 163(2.901)
- repayment where public corp executive compensation too high, 125.7(14), (14.1)
- sale of business, effect of, 125.7(4.1), (4.2)
- subsidy can be paid by CRA at any time, 164(1.6), (1.61)

Canada Employment and Immigration Commission

- costs of appealing decision of, deductible, 60(o)

Canada Employment Credit, 118(10)**Canada Employment Insurance Commission**

- employment insurance benefits, *see* Employment insurance
- financial assistance from, taxable, 56(1)(r)

Canada Gazette

- regulations to be published in, 221(2)

Canada Grain Act, 76(5)

- cash purchase ticket under, 76(4)

Canada Mortgage and Housing Corporation

- subject to tax, 27(2), Reg. 7100

Canada–Newfoundland Atlantic Accord Act

- communication of information for purposes of, 241(4)(d)(vi)

Canada–Nova Scotia Offshore Petroleum Resources Accord

- communication of information for purposes of, 241(4)(d)(vi)

Canada Oil Substitution Program, *see* Energy: conversion grant**Canada Pension Plan / Quebec Pension Plan**

- amount payable by taxpayer under, collection of, 223(1)(c)
- assignment of pension under, 56(2)
- excluded from attribution rules, 74.1(1)
- benefits taxable
- election to pay tax attributable to earlier years, 56(8), 120.3
- information return required, Reg. 200(1)
- non-resident, 212(1)(h)(ii) [repealed], 217
- resident of Canada, 56(1)(a)(i)(B)
- withholding at source, 153(1)(b)
- constitutes earned income for RRSP, 146(1)“earned income”(b.1)
- contributions
- by employee, as employer, deduction for, 8(1)(l.1)
- collection of debt by US Internal Revenue Service, Canada-U.S. Tax Treaty:Art. XXVI-A-9
- credit for, 118.7
- enhanced, deduction for, 60(e.1)
- payroll withholding reduced, Reg. 100(3)

- self-employed earnings
- credit for half, 118.7
- deduction for half, 60(e)
- costs of appealing decision under
- deductible, 60(o)
- recovery of, income, 56(1)(l)(iii)
- death benefit, taxable, 56(1)(a)(i)(F), 56(1)(a.1)
- disability pension
- election to pay tax attributable to earlier years, 56(8), 120.3
- included in earned income
- for RRSP purposes, 146(1)“earned income”(b.1)
- for child care expenses, 63(3)“earned income”(d)
- disclosure of confidential information for purposes of, 241(3)(b), 241(4)(a), 241(4)(e)(iii)
- emigration of taxpayer, no deemed disposition, 128.1(10)“excluded right or interest”(g)(i)
- employer’s source deductions, failure to remit, 227(9.1)
- excluded from pension credit, 118(8)(b)
- non-resident withholding tax, 212(1)(h)
- U.S. residents, Canada-U.S. Tax Treaty:Art. XVIII:5
- repayment of overpayment under, deduction for, 60(n)
- retirement pension under
- assignment of, not subject to attribution, 74.1(1)
- transfer of rights to pension under, 56(4)

Canada Pension Plan Investment Board

- prescribed to own shares of pension investment corporations, Reg. 4802(1)(c.1)

Canada Recovery Benefit (CRB)

- disclosure of taxpayer information for administration of, 241(4)(d)(vii.7)–(vii.9)
- included in income, 56(1)(r)(iv), (iv.1)
- withholding of tax at source, Reg. 100(1)“remuneration”(h), 103(4.1), 103(6)(h)
- repayment required
- calculation and assessment of, *Canada Recovery Benefits Act* s. 8(2)–(4)
- deductible, 60(v.2)

Canada Recovery Caregiving Benefit

- disclosure of taxpayer information for administration of, 241(4)(d)(vii.7)–(vii.9)
- included in income, 56(1)(r)(iv.1)(D)
- withholding of tax at source, Reg. 100(1)“remuneration”(h), 103(4.1), 103(6)(h)
- repayment of, deductible, 60(n), (v.3)

Canada Recovery Hiring Program, 125.7(2.2)

- cannot claim both CRHP and CEWS, 125.7(9.2)

Canada Recovery Sickness Benefit

- disclosure of taxpayer information for administration of, 241(4)(d)(vii.7)–(vii.9)
- included in income, 56(1)(r)(iv), (iv.1)
- withholding of tax at source, Reg. 100(1)“remuneration”(h), 103(4.1), 103(6)(h)
- repayment of, deductible, 60(n), (v.3)

Canada Revenue Agency

- account numbers, *see* Business Number
- audit, *see* Audit
- collection action, *see* Collection of tax
- created, *Canada Revenue Agency Act* 4(1)
- delegation of powers to officials of, 220(2.01)
- employees of, 220(2), (2.01)
- fairness package, *see* Taxpayer relief
- informant program, *see* Informant payments
- official of, interference with, 231.5(2)
- operations of, 220(1)
- procedures not followed, assessment still valid, 166
- refund payable by, *see* Refund
- staff, discipline of, communication of information for, 241(4)(h), 241(4.1)
- tax withheld, held in trust for, 227(4)–(4.2)

- Canada Revenue Agency (*cont'd*)
- taxpayer relief, *see* Taxpayer relief
 - transfers between tax accounts, 221.2
 - waiver of interest and penalty, 220(3.1)
- Canada Safeway case overruled**, 12(1)(x)(iv)
- Canada Savings Bond**
- cash bonus on, 12.1
 - information return, Reg. 220
- Canada Shipping Act**, *see also* Vessel
- quadrennial survey under, reserve for, 20(1)(o), Reg. 3600
 - vessel, defined under, 13(21)
- Canada Student Financial Assistance Act**
- interest paid under, credit for, 118.62
 - loan forgiven to doctor or nurse practising in remote region, no tax, Reg. 7300(c)
- Canada Student Loans Act**
- interest paid under, credit for, 118.62
 - loan forgiven to doctor or nurse practising in remote region, no tax, Reg. 7300(c)
- Canada Training Credit**, 122.91
- assessment of, 152(1)(b)
 - reduces tuition credit, 118.5(1.2)
- Canada–U.K. Tax Convention**, *see* Table of Contents
- Canada–U.S. auto pact**
- payments received, income, 56(1)(a)(v)
- Canada–U.S. Tax Convention**
- prescribed provision for elections, Reg. 7400(1)
 - text, *see* Table of Contents
- Canada Worker Lockdown Benefit**
- disclosure of taxpayer information for administration of, 241(4)(d)(vii.7)–(vii.9)
 - included in income, 56(1)(r)(iv.1)(D.1)
 - withholding of tax at source, Reg. 100(1)“remuneration”(h), 103(4.1), 103(6)(h)
 - repayment of, deductible, 60(n)
- Canada Workers Benefit (former Working Income Tax Benefit)**, 122.7
- advance payment, 122.7(7)
 - credit on tax return, 122.7(2), (3)
- Canadian**
- defined, for Canadian film credit certificate, Reg. 1106(1)“Canadian”
- Canadian affiliate**
- of foreign bank, defined, 142.7(1)
- Canadian Agricultural Income Stabilization program**
- replaces NISA, 248(1)“net income stabilization account”(Notes)
- Canadian Airlines International Limited**
- rescue package, *see* Fuel tax rebate
- Canadian amateur athletic association**, *see also* Registered Canadian amateur athletic association
- business activities of, 149.1(6.01)
 - defined, 149.1(1)
 - political activities of, 149.1(6.201)
 - refusal to register
 - appeal from, 172(3)(a), 180
 - registered, *see* Registered Canadian amateur athletic association
 - registration
 - refusal by Minister
 - deemed, 172(4)(a)
 - resources of, devoted to amateur athletics, 149.1(6.1)
- Canadian art**, *see also* Cultural property
- whether CCA allowed, Reg. 1102(1)(e)
- Canadian assets (of financial institution)**
- defined, 181(2), 190(1.1), Reg. 8600, 8603
- Canadian banking business**
- defined, 248(1)
- Canadian Broadcasting Corporation**
- subject to tax, 27(2), Reg. 7100
- Canadian benefits**
- defined, 217(1)
- Canadian business property**
- defined, Reg. 2400(1)
- Canadian citizen**
- CRA cannot collect U.S. tax from, Canada-U.S. Tax Treaty:Art. XXVI-A:8(a)
 - meaning of, 19(5.1)
 - ownership of Canadian newspaper for advertising expenses, 19(5)“Canadian newspaper”(a)
- Canadian Coast Guard Auxiliary**
- volunteers, tax credit, 118.07
- Canadian Commercial Corporation**
- contract payment from, investment tax credit, Reg. 4606
- Canadian-controlled private corporation**
- corporation becoming
 - deemed year-end, 249(3.1)
 - general rate income pool addition, 89(4)
 - corporation ceasing to be
 - deemed year-end, 249(3.1)
 - low rate income pool addition, 89(8)
 - defined, 125(7), 248(1)
 - dividend refund, 129(1), (3)(a)
 - due date for balance of tax, 248(1)“balance-due day”(d)(i)
 - employee stock options in, 7(1.1)
 - existing since before 1972, ITAR 50
 - gain on shares of, capital gains exemption, 110.6(2.1)
 - instalments quarterly, 157(1.1)–(1.5)
 - investment tax credit
 - additional credit, 127(10.1)
 - refund of credit, 127.1
 - loss on share or debt of, 39(1)(c)
 - reassessment deadline 3 years, 152(3.1)
 - small, *see* Small-CCPC
 - small business deduction, 125(1)
- Canadian corporation**
- corporation ceasing to be, tax on, 219.1
 - defined, 89(1)“Canadian corporation”
 - taxable, defined, 89(1)“taxable Canadian corporation”
 - winding-up of, 88(1)
 - rules, 88(2)
- Canadian Cultural Property Export Review Board**, *see also* Cultural property
- communication of information to, 241(4)(d)(xii)
 - determination of cultural property, 39(1)(a)(i.1), 110.1(1)(c), 118.1(1)“total cultural gifts”
 - determination of value of cultural property, 118.1(10), (11)
 - appeal of determination, *Cultural Property Export and Import Act* 33.1
 - determination applies for 2 years, 118.1(10.1)
- Canadian currency year**
- defined, for functional currency rules, 261(1)
- Canadian development expense**, *see also* Resource expenses
- borrowed money
 - capitalization of interest, 21(2), (4)
 - reassessment, 21(5)
 - conversion to Canadian exploration expense on renunciation before 2019, 66(12.601), (12.602)
 - cumulative
 - amount to be included in income, 66.2(1)
 - deduction for, 66.2(2)
 - short taxation year, 66(13.1)
 - deemed, 66.2(8)

- Canadian development expense (*cont'd*)
 - defined, 66.2(5)
 - partner's share, 66.2(6), (7)
 - successored, deduction for, 66.7(4)
 - defined, 66.2(5)
 - designation re
 - where not made, 66.5(1)
 - flow-through of, to shareholder, 66(12.62)
 - minimum tax, 127.52(1)(e), (e.1)
 - partnership, of
 - election to exclude, 66.2(5)“Canadian development expense”(f)
 - prescribed, Reg. 1218
 - reclassified as Canadian exploration expense, 66.7(9)
 - expenses for preceding years, 66.1(9)
 - “restricted expense” defined, 66.1(6)
 - successor corporation, 66.7(9)
 - renunciation of, 66(12.601) [before 2019], (12.62), (12.73)
 - adjustment, statement to be filed re, 66(12.73)
 - conversion to Canadian exploration expense before 2019, 66(12.601), (12.602)
 - effect of, 66(12.63)
 - excessive, penalty for, 163(2.2)
 - form to be filed by corporation, 66(12.7)
 - late filing, 66(12.74), (12.75)
 - partnership, return to be filed, 66(12.69)
 - late filing, 66(12.74), (12.75)
 - restriction on, 66(12.67), (12.71)
 - successor corporation, rules, 66.7(4)
 - application, 66.6(1)
- Canadian Emergency Business Account**
 - forgivable loan, taxable, 12(1)(x)(iv)
- Canadian equity property**
 - defined, Reg. 2400(1)
- Canadian exploration and development expenses, *see also* Exploration and development expenses**
 - borrowed money
 - interest capitalized, 21(2), (4)
 - reassessment, 21(5)
 - computation of, 66(12)
 - deduction for, 66(1)–(3)
 - defined, 66(15)
 - limitations of, 66(12.1)
 - principal-business corporation, 66(1)
 - successor corporation, rules, 66.7(1)
 - application, 66.6(1)
 - taxpayers other than principal-business corporations, 66(3)
 - unitized oil or gas field, 66(12.2), (12.3)
- Canadian exploration and development overhead expense, Reg. 1206(1)**
- Canadian exploration expense, *see also* Exploration and development expenses; Resource expenses**
 - borrowed money
 - capitalization of interest, 21(2), (4)
 - reassessment, 21(5)
 - certificate re oil/gas well ceasing to be valid, 66.1(10)
 - cumulative
 - amount included in, income, 66.1(1)
 - deduction for, 66.1(3)
 - deduction from income, 66.1(2), (3)
 - defined, 66.1(6)
 - other than principal-business corporation
 - deduction from income, 66.1(3)
 - partner's share, 66.1(7)
 - principal-business corporation
 - deduction from income, 66.1(2)
 - trust of, reduced by investment tax credit, 127(12.3)
 - defined, 66.1(6)
 - flow-through of, to shareholder, 66(12.6)
 - expenses in first 60 days of year, 66(12.66)
 - minimum tax, 127.52(1)(e), (e.1)
 - prescribed, Reg. 1217
 - reclassification of Canadian development expense as, 66.7(9)
 - “restricted expense” defined, 66.1(6)
 - “specified purpose” defined, 66.1(6)
 - renunciation of, 66(12.6)
 - adjustment, statement to be filed, 66(12.73)
 - effect of, 66(12.61)
 - excessive, penalty for, 163(2.2)
 - form to be filed by corporation, 66(12.7)
 - late filing, 66(12.74), (12.75)
 - non-arm's length partnership, 66(17)
 - partnership, return to be filed, 66(12.69)
 - late filing, 66(12.74), (12.75)
 - restriction on, 66(12.67), (12.71)
 - successor corporation, rules, 66.7(3)
 - application, 66.6(1)
 - Canadian field processing**
 - defined, 248(1)
 - excluded from manufacturing and processing
 - for Class 29 CCA, Reg. 1104(9)(k)
 - ineligible for M&P credit, 125.1(3)“manufacturing or processing”(k)
 - property for use in, investment tax credit, 127(9)“qualified property”(c)(ix)
 - property used for, capital cost allowance, Reg. Sch. II:Cl. 29(a)(ii), Sch. II:Cl. 41(c), (d)
 - Canadian film or video production**
 - capital cost allowance offsetting income from, Reg. 1100(1)(m)
 - defined, 125.4(1), Reg. 1106(4)
 - separate CCA class, Reg. 1101(5k.1), Reg. Sch. II:Cl. 10(x)
 - Canadian film or video production certificate**
 - defined, 125.4(1)
 - disclosure of information to public, 241(3.3)
 - revocation of, 125.4(6)
 - tax credit where issued, 125.4(3)
 - Canadian film or video tax credit, 125.4, *see also* Canadian film or video production; Film or video production services credit**
 - amalgamation of corporations, 87(2)(j.94)
 - prescribed person, Reg. 1106(7)
 - refund of credit before assessment, 164(1)(a)(ii)
 - tax shelter investment excluded, 125.4(4)
 - Canadian financial institution**
 - defined, for Common Reporting Standard, 270(1)
 - Canadian Forces and veterans**
 - allowances not income, 6(1)(b)(ii), (iii)
 - clothing allowance exempt, 81(1)(d.1)
 - death benefit exempt, 81(1)(d.1)
 - detention benefit exempt, 81(1)(d.1)
 - disability award exempt, 81(1)(d.1)
 - earnings loss benefit taxable, 6(1)(f.1)
 - high-risk missions, income exemption, 110(1)(f)(v)
 - no source withholding, Reg. 102(6)
 - income support benefit exempt, 81(1)(d.1)
 - members deemed resident in Canada, 250(1)(b), 250(2)
 - pension income credit, 118(3)(B)(b)(ii)
 - pension income splitting, 60.03(1)“eligible pension income”(c)
 - permanent impairment allowance taxable, 6(1)(f.1)
 - supplementary retirement benefit taxable, 6(1)(f.1)
 - travelling and separation allowances, not income, 6(1)(b)(ii)
 - Canadian government film agency**
 - defined, Reg. 1106(1)
 - disclosure of tax information to, 241(4)(d)(xv)
 - prescribed person for Canadian film/video tax credit, Reg. 1106(10)(d)

Canadian group member

- defined, for alternative interest-deduction restrictions, 18.21(1)

Canadian Heritage, Department of, *see also* Minister of Canadian Heritage

- allocation of points to determine if film or video production is Canadian, Reg. 1106(5)
- disclosure of information re cultural property to, 241(4)(d)(xii)

Canadian Home Insulation Program, *see* Home insulation grant**Canadian indebtedness**

- defined, for FAPI of banks, 95(2.43)

Canadian International Development Agency

- prescribed international development assistance program
- defined, Reg. 3400
- person working on deemed resident in Canada, 250(1)(d)

Canadian investment fund

- defined, Reg. 2400(1)

Canadian investment income

- defined, 129(4) [repealed]

Canadian investment property

- defined, Reg. 2400(1)

Canadian investor

- defined, 115.2(1)

Canadian labour expenditure

- defined, for film/video production services credit, 125.5(1)
- qualified, *see* Qualified Canadian labour expenditure

Canadian life investment income, defined, 211.1(3)**Canadian manufacturing and processing profits**

- calculation of, Reg. Part LII
- defined, 125.1(3)

Canadian National Railway, *see also* Railway**Canadian newspaper**

- defined, 19(5)

Canadian oil and gas exploration expense, Reg. 1206(1)**Canadian oil and gas property expense**, *see also* Exploration and development expenses; Resource expenses

- borrowed money
 - interest capitalized, 21(2), (4)
 - reassessment, 21(5)
- cumulative
 - deduction for, 66.4(2)
 - defined, 66.4(5)
 - recovery of costs, 66.4(1)
 - short taxation year, 66(13.1)
 - successored, deduction for, 66.7(5)
- defined, 66.4(5)
- disposition, defined, 66.4(5)“disposition” and “proceeds of disposition”
- flow-through of, to shareholder, 66(12.64)
- minimum tax, 127.52(1)(e), (e.1)
- partnership, of
 - election to exclude, 66.4(5)“Canadian oil and gas property expense”(b)
 - partner’s share, 66.4(6), (7)
 - proceeds of disposition, defined, 66.4(5)“disposition” and “proceeds of disposition”
 - renunciation of, 66(12.64)
 - adjustment, statement to be filed re, 66(12.73)
 - effect of, 66(12.65)
 - excessive, penalty for, 163(2.2)
 - form to be filed by corporation, 66(12.7)
 - late filing, 66(12.74), (12.75)
 - partnership, return to be filed, 66(12.69)
 - late filing, 66(12.74), (12.75)
 - restriction on, 66(12.67), (12.71)
 - successor corporation, rules, 66.7(5)
 - application, 66.6(2)
 - unitized oil or gas field, 66(12.5)

Canadian option interest note

- prepaid interest not deductible, 18(9.2)–(9.8)

Canadian ordinary income

- defined, for hybrid mismatch arrangement rules, 18.4(1), 18.4(8)

Canadian outstanding premiums

- defined, Reg. 2400(1)

Canadian Pacific Ltd. case overruled, 20.3**Canadian partnership**, *see also* Canadian resident partnership

- defined, 102(1), 248(1)
- eligible, defined, 80(1)

Canadian premiums

- defined, Reg. 8600

Canadian property, *see also* Foreign property

- mutual fund investment, *see* Canadian property mutual fund investment
- taxable, *see* Taxable Canadian property

Canadian property mutual fund investment

- defined, 218.3(1)

Canadian property mutual fund loss

- defined, 218.3(1)

Canadian Radio-television and Telecommunications Commission

- disclosure of information to, 241(4)(d)(xvi)

Canadian real, immovable or resource property

- defined, 248(1)

Canadian renewable and conservation expense

- capital cost allowance disallowed, Reg. 1102(1)(a.1)
- defined, 66.1(6), Reg. 1219
- included in CEE, 66.1(6)“Canadian exploration expense”(g.1)

Canadian reserve liabilities

- of financial institution, defined, 181(2), 190(1)
- of insurer, Reg. 2400(1)
 - Large Corporations Tax, Reg. 8600

Canadian resident partnership, *see also* Canadian partnership

- defined, 248(1)
- taxation year of, 249(1)(a)

Canadian resource expenses

- reduction of, on change of control, 66.7(12)

Canadian resource profits

- defined, Reg. 5202

Canadian resource property

- acquisition from exempt person, 66.6
- amalgamation — partnership property, 66.7(10)(j), 66.7(10.1)
- amount designated re
 - “outlay” or “expense”, 66(15)“outlay” or “expense”
- constitutes taxable Canadian property for certain purposes, 248(1)“taxable Canadian property”(n)(i)
- defined, 66(15)
- disposition of
 - by non-resident
 - certificate, 116(5.2)
 - purchaser liable for tax, 116(5.2)
 - rules, 116(5.1)
 - treaty-protected property, 116(5.01), (5.02)
 - effect on successor rules, 66.7(14)
 - no capital gain, 39(1)(a)(ii)
 - no capital loss, 39(1)(b)(ii)
 - “eligible property” for transfer to corporation by shareholder, 85(1.1)(c)
 - in corporation, share is taxable Canadian property, 248(1)“taxable Canadian property”(e)(i)(B), (ii)(B)
 - in partnership, constitutes taxable Canadian property, 248(1)“taxable Canadian property”(g)(ii)
 - non-resident’s income earned on, 115(4)

- Canadian resource property (*cont'd*)
 - non-successor acquisitions, 66.7(16)
 - original owner, defined, 66(15)
 - predecessor owner, defined, 66(15)
 - production from, defined, 66(15)
 - refund or rebate of Crown royalties, 12(1)(x.2)
 - reserve amount, defined, 66(15)
 - rules for trusts, 104(5.2)
 - successor rules, 66.7(14)
- Canadian security**
 - defined, 39(6)
 - disposition of, 39(5)
 - election re, 39(4)
 - owned by partnership, 39(4.1)
- Canadian Security Intelligence Service**
 - provision of charity information to, for security purposes, 241(9), (9.1)
- Canadian service provider**
 - defined, re non-resident investment or pension fund, 115.2(1)
- Canadian tax**
 - defined, Canada-U.S. Tax Treaty:Art. III:1(a)
- Canadian tax results**
 - defined, for functional currency rules, 261(1)
- Canadian Venture Exchange**
 - prescribed securities exchange investment, Reg. 9002.2(e)
 - prescribed stock exchange, 262
- Canadian Vessel Construction Assistance Act**
 - conversion cost deemed separate class, 13(17)
 - deduction under, deemed depreciation, 13(13)
 - disposition of deposit under, 13(19), (20)
- Canadian waters**
 - defined, *Interpretation Act* 35(1)
- Canadian Wheat Board**
 - defined, 135.2(1)
 - Farmers' Trust, 135.2(1)"eligible trust"
 - unit of, ineligible for TFSA, 135.2(4)(g)
 - paid-up capital on issuing shares to trust, 135.2(3)(c)
 - tax consequences of privatization, 135.2
- Canadian Wheat Board Act**, 76(5)
- Canadian Wheat Board continuance**
 - defined, 135.2(1)
- Canals**
 - capital cost allowance, Reg. Sch. II:Cl. 1(b)
- Cancellation of interest, penalty or tax**, *see* Waiver
- Cancellation of lease**, *see* Lease cancellation payment
- Canoes**
 - capital cost allowance, Reg. Sch. II:Cl. 7
- Canterra Energy Ltd. case overruled**, 257
- Capacity test**
 - for shareholder loans, 15(2.4)(e)
- Cape Breton**
 - defined, 127(9)
 - Development Corporation, subject to tax, 27(2), Reg. 7100
- Capital**
 - contribution of, addition to adjusted cost base, 53(1)(c)
 - cost, *see* Capital cost; Capital cost allowance
 - cost of, defined, Reg. 5202, 5203, 5204
 - deemed contribution of, 53(1.1)
 - defined
 - for financial institutions tax, 190.13
 - for large corporations tax, 181.2(3), 181.3(3)
 - element, *see* Capital element
 - expenditure, not deductible, 18(1)(b)
 - depreciation, *see* Capital cost allowance
 - disability-related building modifications, deductible, 20(1)(qq)
 - disability-related devices or equipment, 20(1)(rr)
 - goodwill, deduction for, 20(1)(b)
 - landscaping, deduction for, 20(1)(aa)
 - pre-production mining expenditure, whether excluded, 66.1(6.2)
 - scientific research and experimental development, deductible, 37
 - site investigation fees, deductible, 20(1)(dd)
 - financial institutions', tax on, 190–190.211
 - gains, *see* Capital gain
 - income and, combined, 16(1), (4), (5)
 - losses, *see* Capital loss
 - outlay or loss, not deductible, 18(1)(b)
 - property, *see* Capital property
 - reorganization of, exchange of shares, 86(1); ITAR 26(27)
 - stock, *see* Capital stock
 - tax, *see* Capital tax
 - thin, 18(4)–(8)
- Capital cost**
 - allowance, *see* Capital cost allowance
 - deemed, 13(7)–(7.4)
 - depreciable property acquired with government assistance, 13(7.1), (7.2)
 - on death, 70(13)
 - reduction due to debt forgiveness, 13(7.1)(g), 80(5)
 - leased property acquired, 13(5.1)
 - manufacturing and processing property
 - deemed, 13(10)
 - tax shelter investment, 143.2(6)
 - undepreciated, *see* Undepreciated capital cost
- Capital cost allowance**, *see also* Depreciable property
 - accelerated investment incentive property (2018–2027), *see* Accelerated investment incentive property
 - access road (forest), Reg. Sch. II:Cl. 10(p)
 - acquisition year rules, Reg. 1100(2)–(2.4)
 - non-arm's length exception, Reg. 1102(20)
 - additional allowances
 - Canadian vessel, Reg. 1100(1)(v)
 - certified productions, Reg. 1100(1)(l)
 - Class 13, Reg. 1100(1)(b)
 - Class 14, Reg. 1100(1)(c)
 - Class 19, Reg. 1100(1)(n), (o)
 - Class 20, Reg. 1100(1)(p)
 - Class 21, Reg. 1100(1)(q)
 - Class 28, Reg. 1100(1)(w)
 - Class 35, Reg. 1100(1)(za.1)
 - Class 38, Reg. 1100(1)(zd)
 - Class 39, Reg. 1100(1)(ze)
 - Class 40, Reg. 1100(1)(zf)
 - Class 41, Reg. 1100(1)(y)
 - Class 43 (after 2025), Reg. 1100(2)A(d)
 - Class 43.1, Reg. 1100(2)A(b)
 - Class 43.2, Reg. 1100(2)A(c)
 - Class 53, Reg. 1100(2)A(d)
 - Class 54, Reg. 1100(2)A(e)
 - Class 55, Reg. 1100(2)A(f)
 - Class 56, Reg. 1100(2)A(e)
 - electric cars, Reg. 1100(2)A(e), (f)
 - fishing vessels, Reg. 1100(1)(i)
 - grain storage facilities, Reg. 1100(1)(sb)
 - railway cars, Reg. 1100(1)(z), (z.1a)
 - railway track, Reg. 1100(1)(za), (za.1), (zb)
 - railway trestles, Reg. 1100(1)(za.2)
 - zero-emission vehicles, Reg. 1100(2)A(e), (f)
- additions and alterations, *see also* building (*below*)
- advertising sign, Reg. Sch. II:Cl. 11
- aircraft, Reg. Sch. II:Cl. 9, Sch. II:Cl. 16

Index

- Capital cost allowance (*cont'd*)
- employee's, 8(1)(j), 13(11), Reg. 1100(6)
 - airplane hangar, Reg. Sch. II:Cl. 6
 - airplane runway, Reg. Sch. II:Cl. 1(g), Sch. II:Cl. 17(c)
 - for mine, Reg. Sch. II:Cl. 10(l)(ii)
 - amount deductible, 20(1)(a), Reg. Parts Part XI, XVII
 - amusement parks, property used in connection with, Reg. 1103(2b), 1104(12), Reg. Sch. II:Cl. 37
 - defined, Reg. 1104(12)
 - apparel for rental, Reg. Sch. II:Cl. 12(k)
 - automobile, Reg. 1102(1)(h)
 - definitions, Reg. 1102(11)
 - employee's, 8(1)(j)(ii), 13(11), Reg. 1100(6)
 - exclusion, Reg. 1102(1)(h)
 - general, Reg. 1102(11)–(13), Reg. Sch. II:Cl. 10(a)
 - short-term rental or leasing, for, Reg. Sch. II:Cl. 16
 - automotive equipment, Reg. Sch. II:Cl. 10(a)
 - available-for-use rule, 13(26)–(32), 20(28), (29), Reg. 1100(2)
 - beneficiary of trust, deduction for, 104(16), (17.1), (17.2) [repealed]
 - biogas production equipment, Reg. Sch. II:Cl. 43.1(d)(xiii), Sch. II:Cl. 43.2(b)
 - bio-oil equipment, Reg. Sch. II:Cl. 43.1(d)(xi), Sch. II:Cl. 43.2(b)
 - book (library), Reg. Sch. II:Cl. 12(a)
 - breakwater, Reg. Sch. II:Cl. 3, Sch. II:Cl. 6
 - bridge, Reg. Sch. II:Cl. 1(a)
 - building, Reg. Sch. II:Cl. 1(q), Sch. II:Cl. 3, Sch. II:Cl. 6(a), Sch. II:Cl. 8
 - addition/alteration, Reg. 1102(19), Reg. Sch. II:Cl. 3(g), Sch. II:Cl. 3(k), Sch. II:Cl. 6(i), Sch. II:Cl. 6(k)
 - additional allowance for use in manufacturing or processing, Reg. 1100(1)(a.1)
 - additional allowance for non-residential use, Reg. 1100(1)(a.2)
 - separate class where cost over \$50,000, Reg. 1101(1ac), (1ad), (5b)
 - cable system interface equipment, Reg. Sch. II:Cl. 10(v)
 - Canadian film or video production, Reg. 1100(1)(m), Reg. Sch. II:Cl. 10(x)
 - separate class, Reg. 1101(5k.1)
 - canal, Reg. Sch. II:Cl. 1(b)
 - canoe, Reg. Sch. II:Cl. 7
 - carbon dioxide pipeline, Reg. Sch. II:Cl. 49(b)
 - catalyst, Reg. Sch. II:Cl. 26
 - catch-all class, Reg. Sch. II:Cl. 8
 - certified Class 34 properties, Reg. 1104(11)
 - certified films and video tapes, Reg. 1100(21)–(23)
 - certified production, Reg. Sch. II:Cl. 10(w), Sch. II:Cl. 12(n)
 - separate classes, Reg. 1101(5k), (5l)
 - chinaware, Reg. Sch. II:Cl. 12(b)
 - Class 38 property
 - separate class, election, Reg. 1101(5l)
 - classes of depreciable property, Reg. Sch. II
 - inclusions in, Reg. 1103
 - prescribed, Reg. 1105
 - separate, Reg. 1101
 - transfers between, Reg. 1103
 - coin-operated game, Reg. Sch. II:Cl. 16(f)
 - combustion turbine, Reg. 1101(5t), Reg. Sch. II:Cl. 17(a.1), Sch. II:Cl. 48
 - compression equipment, Reg. Sch. II:Cl. 7(j), (k)
 - computer, *see* Computer: capital cost allowance
 - computer software, Reg. Sch. II:Cl. 12(o)
 - limitation where tax shelter investment, Reg. 1100(20.1)
 - concession, Reg. Sch. II:Cl. 14
 - contractor's movable equipment, Reg. Sch. II:Cl. 10(h), Sch. II:Cl. 22, Sch. II:Cl. 38
 - culvert, Reg. Sch. II:Cl. 1(c)
 - cutlery, Reg. Sch. II:Cl. 12(b)
 - cutting rights, Reg. 1100(1)(e)
 - cutting/shaping part in machine, Reg. Sch. II:Cl. 12(j)
 - dam, Reg. Sch. II:Cl. 1(d)
 - for mine, Reg. Sch. II:Cl. 10(l)
 - data cable, Reg. Sch. II:Cl. 42(b)
 - data communication equipment, Reg. Sch. II:Cl. 3
 - data network infrastructure equipment, Reg. Sch. II:Cl. 46
 - deductions allowed, Reg. 1100
 - deemed depreciable property, separate classes, Reg. 1101(5g), Reg. Sch. II:Cl. 36
 - definitions, Reg. 1104
 - dental instruments (small), Reg. Sch. II:Cl. 12(e)
 - die, etc., Reg. Sch. II:Cl. 12(d)
 - distribution equipment, Reg. Sch. II:Cl. 47
 - district energy equipment, Reg. Sch. II:Cl. 43.1(a)(iii.1), Sch. II:Cl. 43.1(d)(xv)
 - dock, Reg. Sch. II:Cl. 3
 - for mine, Reg. Sch. II:Cl. 10(l)
 - drilling vessels, Reg. 1100(1)(va)
 - drive-in theatre property, Reg. Sch. II:Cl. 10(q)
 - earth-moving equipment, Reg. Sch. II:Cl. 22, Sch. II:Cl. 38
 - separate class, election, Reg. 1101(5l)
 - electric cars, Reg. 1100(1)(a)(xl), (xli), Reg. 1100(2)A(e), (f)
 - electric vehicle charging station, Reg. Sch. II:Cl. 43.1(d)(xvii)
 - electrical energy storage property, Reg. Sch. II:Cl. 43.1(d)(xviii)
 - electrical generating equipment, Reg. 1100(1)(t), (ta), Reg. Sch. II:Cl. 1(k), Sch. II:Cl. 1(m), Sch. II:Cl. 2(a), Sch. II:Cl. 8(g), Sch. II:Cl. 9(e), Sch. II:Cl. 9(f), Sch. II:Cl. 17(a.1), Sch. II:Cl. 29, Sch. II:Cl. 41, Sch. II:Cl. 43.1, Sch. II:Cl. 43.2
 - electric energy producer/distributor, Reg. Sch. II:Cl. 2(c), Sch. II:Cl. 8(f), Sch. II:Cl. 9(a)
 - used for mining, Reg. 1102(8)–(9.2), Reg. Sch. II:Cl. 10(r)
 - electronic data-processing equipment, *see* Computer: capital cost allowance
 - eligible capital property after 2016, Reg. Sch. II:Cl. 14.1
 - eligible liquefaction facility
 - building, Reg. 1100(1)(a.3), Sch. II:Cl. 1(q)
 - equipment, Reg. 1100(1)(yb), Sch. II:Cl. 47
 - employee's automobile or aircraft, 8(1)(j)(ii), 13(11), Reg. 1100(6)
 - fast writeoff, *see also* additional allowances (above)
 - year of acquisition, Reg. 1100(2)
 - fence, Reg. Sch. II:Cl. 6
 - in amusement park, Reg. Sch. II:Cl. 37
 - fibre-optic cable, Reg. Sch. II:Cl. 42(a)
 - 50% rule, Reg. 1100(2)–(2.4)
 - non-arm's length exception, Reg. 1102(20)
 - film production, *see* Canadian film or video production
 - films and video tapes, Reg. 1100(21)–(23), 1104(2), (10)
 - first-year rule, Reg. 1100(2)–(2.4)
 - fishing vessels, Reg. 1100(1)(i)
 - separate classes, Reg. 1101(2)
 - fixed location fuel cell systems or equipment, Reg. Sch. II:Cl. 43.1(a)(ii.1), Sch. II:Cl. 43.1(d)(xii), Sch. II:Cl. 43.2(b)
 - franchise, Reg. 1100(1)(c), 1100(9), Reg. Sch. II:Cl. 14
 - fuel upgrading equipment, Reg. Sch. II:Cl. 43.1(d)(ix), Sch. II:Cl. 43.2(b)
 - gas manufacturing/distributing equipment, Reg. Sch. II:Cl. 1(n), Sch. II:Cl. 2(d)
 - general-purpose electronic data processing equipment, Reg. Sch. II:Cl. 10(f), Sch. II:Cl. 45, Sch. II:Cl. 50
 - generating equipment, Reg. 1100(1)(t), (ta), Reg. Sch. II:Cl. 1(k), Sch. II:Cl. 1(m), Sch. II:Cl. 2(a), Sch. II:Cl. 2(c), Sch. II:Cl. 8(f), Sch. II:Cl. 8(g), Sch. II:Cl. 9(a), Sch. II:Cl. 9(e), Sch. II:Cl. 9(f), Sch. II:Cl. 29
 - geothermal energy project, Reg. Sch. II:Cl. 43.1(d)(vii)
 - goodwill after 2016, Reg. Sch. II:Cl. 14.1
 - grain storage facilities, Reg. 1100(1)(sb)
 - greenhouse, Reg. Sch. II:Cl. 6

- Capital cost allowance (*cont'd*)
- ground source heat pump system, Reg. Sch. II:Cl. 43.1(d)(i), Sch. II:Cl. 43.2(b)
 - half-year rule, Reg. 1100(2)–(2.4)
 - harness, Reg. Sch. II:Cl. 10(c)
 - heat production/distribution equipment, Reg. Sch. II:Cl. 1(p), Sch. II:Cl. 2(f)
 - heat recovery equipment, Reg. Sch. II:Cl. 43.1
 - heavy water, Reg. Sch. II:Cl. 26
 - immediate expensing (2021–2024), Reg. 1100(0.1)–(0.3), 1104(3.1)–(3.6)
 - industrial mineral mines, Reg. 1100(1)(g), Reg. Sch. V
 - jetty, Reg. Sch. II:Cl. 1(e), Sch. II:Cl. 3
 - jig, Reg. Sch. II:Cl. 12(d)
 - kiln, Reg. Sch. II:Cl. 8
 - kitchen utensils, Reg. Sch. II:Cl. 12(c)
 - land excluded, Reg. 1102(2)
 - last, Reg. Sch. II:Cl. 12(d)
 - lease option agreements, separate classes, Reg. 1101(5)
 - leased properties
 - buildings on, Reg. 1102(5)
 - improvements to, Reg. 1102(4)
 - leasehold interest, Reg. 1100(1)(b), 1102(4)–(6), Reg. Sch. II:Cl. 13, Reg. Sch. III
 - acquired before 1949, Reg. 1102(6)
 - separate classes, Reg. 1101(5h)
 - leasing properties, Reg. 1100(15)–(20)
 - non-arm's length exception, Reg. 1102(20)
 - separate classes, 1101(5c)
 - licence, Reg. Sch. II:Cl. 14
 - linen, Reg. Sch. II:Cl. 12(g)
 - liquefied natural gas facility, Reg. Sch. II:Cl. 47(b)
 - LNG facility, *see* eligible liquefaction facility (above)
 - locomotive, Reg. Sch. II:Cl. 6, 7(i)
 - logging equipment, Reg. Sch. II:Cl. 10(o)
 - machinery/equipment, Reg. Sch. II:Cl. 8, Sch. II:Cl. 29, Sch. II:Cl. 43
 - manufacturing/processing business, Reg. 1102(15), (16)
 - excluded activities, Reg. 1104(9)
 - property used in, Reg. Sch. II:Cl. 29, Sch. II:Cl. 43, Sch. II:Cl. 53
 - marine railway, Reg. Sch. II:Cl. 7
 - medical instruments, Reg. Sch. II:Cl. 12(e)
 - mine buildings, Reg. Sch. II:Cl. 10(g), Sch. II:Cl. 41
 - mine equipment etc., Reg. Sch. II:Cl. 10(k), Sch. II:Cl. 10(l), Sch. II:Cl. 10(m), Sch. II:Cl. 41
 - mine property, Reg. 1100(1)(w), (x), 1100A, Reg. Sch. II:Cl. 28, Sch. II:Cl. 41
 - mine shaft etc., Reg. Sch. II:Cl. 12(f)
 - mining, definitions, Reg. 1104(5)–(8)
 - misclassified property, 13(6)
 - mold, Reg. Sch. II:Cl. 12(d)
 - mole, Reg. Sch. II:Cl. 1(f), Sch. II:Cl. 3
 - motion picture film, Reg. Sch. II:Cl. 10(s)
 - multiple-unit residential buildings, Reg. Sch. II
 - separate classes, Reg. 1101(5b)
 - natural gas distribution pipeline, Reg. Sch. II:Cl. 51
 - network equipment, Reg. Sch. II:Cl. 46
 - non-residents, Reg. 1102(3)
 - offshore drilling vessels
 - additional allowance, Reg. 1100(1)(va)
 - separate classes, Reg. 1101(2b)
 - oil or gas well equipment, Reg. Sch. II:Cl. 10(j), Sch. II:Cl. 41
 - oil refinery property, Reg. Sch. II:Cl. 10(u), Sch. II:Cl. 41
 - oil storage tank, Reg. Sch. II:Cl. 6, Sch. II:Cl. 29
 - outdoor advertising structures, Reg. Sch. II:Cl. 8(l), Sch. II:Cl. 11
 - separate class, election, Reg. 1101(5l)
 - overburden removal cost, Reg. Sch. II:Cl. 12(q)
 - parking area, Reg. Sch. II:Cl. 1(g)
 - for mine, Reg. Sch. II:Cl. 10(l)
 - partnership property, excluded, Reg. 1102(1a)
 - patent, Reg. 1100(1)(c), 1100(9), Reg. Sch. II:Cl. 14, Sch. II:Cl. 44
 - pattern, Reg. Sch. II:Cl. 12(d)
 - photovoltaic equipment, Reg. Sch. II:Cl. 43.1(d)(vi), Sch. II:Cl. 43.1(d)(xiii), Sch. II:Cl. 43.2(b)
 - pinball machine, Reg. Sch. II:Cl. 16(f)
 - pipeline, Reg. Sch. II:Cl. 1(l), Sch. II:Cl. 2(b), Sch. II:Cl. 49
 - for mine, Reg. Sch. II:Cl. 10(l)
 - separate classes, Reg. 1101(5i), (5j)
 - pollution control equipment, Reg. 1100(1)(t)
 - prescribed classes of depreciable property, Reg. 1105
 - property acquired by transfer, amalgamation or winding-up, Reg. 1102(14), (14.1)
 - non-arm's length exception, Reg. 1102(20)
 - property acquired in the year, Reg. 1100(2)–(2.4)
 - non-arm's length exception, Reg. 1102(20)
 - property not included in classes, Reg. 1102
 - pumping equipment, Reg. Sch. II:Cl. 7(j), Sch. II:Cl. 7(k)
 - radar equipment, Reg. Sch. II:Cl. 9
 - radio communication equipment, Reg. Sch. II:Cl. 8, Sch. II:Cl. 9
 - rail suspension device, Reg. Sch. II:Cl. 7(h)(i), Sch. II:Cl. 35(b)
 - railway cars, Reg. 1100(1)(z), (z.1a), Reg. Sch. II:Cl. 7(h)(ii), Cl. 35
 - separate classes, Reg. 1101(5d)–(5d.2)
 - railway locomotive, Reg. Sch. II:Cl. 6(j), Sch. II:Cl. 7(i), Sch. II:Cl. 10(y)
 - railway property, Reg. 1100(1)(zc)
 - railway sidings, Reg. 1100(8)
 - railway system, Reg. Sch. II:Cl. 4
 - railway tank car, Reg. Sch. II:Cl. 6
 - railway track, Reg. 1100(1)(za.1), (zb), Reg. Sch. II:Cl. 1(h)
 - for mine, Reg. Sch. II:Cl. 10(m), Sch. II:Cl. 41
 - separate classes, Reg. 1101(5e), (5e.1)
 - railway traffic control equipment, Reg. Sch. II:Cl. 1(i)
 - rapid transit car, Reg. Sch. II:Cl. 8
 - rates for various classes of property, Reg. 1100(1)
 - recapture, 13(1); ITAR 20(2)
 - passenger vehicle, 13(2)
 - R&D expenditures previously deducted, 37(6)
 - rollover where property replaced, 13(4), (4.1)
 - vessels, 13(13), (15), (16)
 - reclassification of property, 13(5)
 - recreational property, Reg. 1102(17)
 - regulations, Reg. Part XI
 - rental properties, Reg. 1100(11)–(14.2)
 - non-arm's length exception, Reg. 1102(20)
 - separate class for each, Reg. 1101(1ac)–(1ae)
 - revocation of certificates (Class 34 properties), Reg. 1104(11)
 - river improvements, Reg. 1102(7)
 - roadway, Reg. Sch. II:Cl. 1(g), Sch. II:Cl. 17
 - for mine, Reg. Sch. II:Cl. 10(l)
 - roller skating rink floor, Reg. Sch. II:Cl. 10(i)
 - rowboat, Reg. Sch. II:Cl. 7
 - rules re property, Reg. 1102
 - runway, *see* airplane runway (above)
 - scale, metric, for retail use, Reg. Sch. II:Cl. 12(p)
 - scow, Reg. Sch. II:Cl. 7
 - separate classes, *see* Separate classes for capital cost allowance
 - shares, no CCA allowed, 18(1)(y)
 - sidewalk, Reg. Sch. II:Cl. 1(g)
 - sleigh, Reg. Sch. II:Cl. 10(d)
 - software, *see* computer software (above)
 - solar heating equipment, Reg. Sch. II:Cl. 43.1(d)(i), Sch. II:Cl. 43.2(b)

- Capital cost allowance (*cont'd*)
 - stable equipment, Reg. Sch. II:Cl. 10(c)
 - storage area, Reg. Sch. II:Cl. 1(g)
 - • for mine, Reg. Sch. II:Cl. 10(l)
 - subway, Reg. Sch. II:Cl. 1(j)
 - systems software, Reg. 1104(2), Reg. Sch. II:Cl. 10(f), Sch. II:Cl. 29
 - tableware, Reg. Sch. II:Cl. 12(b)
 - tangible capital property not elsewhere specified, Reg. Sch. II:Cl. 8(i)
 - tank (oil or water), Reg. Sch. II:Cl. 8
 - taxation year less than 12 months, Reg. 1100(3)
 - taxicab, Reg. Sch. II:Cl. 16
 - telecommunication spacecraft, Reg. Sch. II:Cl. 10(f.2), Sch. II:Cl. 30(a)
 - • separate classes, Reg. 1101(5a)
 - telephone cable, Reg. Sch. II:Cl. 42(b)
 - telephone/telegraph equipment, Reg. Sch. II:Cl. 3, Sch. II:Cl. 17
 - telephone/telegraph system, Reg. Sch. II:Cl. 17
 - television commercial, Reg. Sch. II:Cl. 12(m)
 - terminal loss, 20(16)
 - • limitation re franchise or licence exchanged, 20(16.1)(b)
 - • limitation re passenger vehicles, 20(16.1)(a)
 - tidal energy, electricity generation equipment, Reg. Sch. II:Cl. 43.1(d)(xiv), Sch. II:Cl. 43.2
 - timber cutting/clearing equipment etc., Reg. Sch. II:Cl. 10(n), Sch. II:Cl. 15
 - timber limits and cutting rights, Reg. 1100(1)(e)
 - • separate classes, Reg. 1101(3)
 - timber resource property, Reg. Sch. II:Cl. 33
 - tools
 - • portable, for rental, Reg. Sch. II:Cl. 10(b), Sch. II:Cl. 29
 - • small, Reg. Sch. II:Cl. 12(h)
 - “total depreciation” defined, 13(21)
 - townsite costs for mine, Reg. 1102(18) [repealed], Reg. Sch. II:Cl. 10(1)
 - trailer, Reg. Sch. II:Cl. 10(e)
 - tramways, Reg. Sch. II:Cl. 4
 - transferred property, 13(5)
 - transmission equipment, Reg. Sch. II:Cl. 47
 - trestles, Reg. 1100(1)(za.2), (zb), Reg. Sch. II:Cl. 3
 - • separate classes, Reg. 1101(5e.2), (5f)
 - tunnel, Reg. Sch. II:Cl. 1(j)
 - undepreciated capital cost, defined, 13(21)
 - underground storage cost, Reg. Sch. II:Cl. 10(f.1), Sch. II:Cl. 41
 - uniforms, Reg. Sch. II:Cl. 12(k)
 - vat, Reg. Sch. II:Cl. 8
 - vehicle charging station, Reg. Sch. II:Cl. 43.1(d)(xvii)
 - vessels, Reg. 1101(2)–(2b), Reg. Sch. II:Cl. 7
 - • certified, Reg. 1100(1)(v), 1101(2a)
 - • separate classes, Reg. 1101(2)–(2b)
 - video game, Reg. Sch. II:Cl. 16(f)
 - videotape, Reg. Sch. II:Cl. 10(s), Sch. II:Cl. 12(l), Sch. II:Cl. 12(m)
 - videotape cassette for rental, Reg. Sch. II:Cl. 12(r)
 - wagon, Reg. Sch. II:Cl. 10(d)
 - waste-fuelled thermal energy system, Reg. Sch. II:Cl. 43.1(d)(ix), Sch. II:Cl. 43.2(b)
 - water distributing equipment, Reg. Sch. II:Cl. 1(o), Sch. II:Cl. 10(e)
 - water storage tank, Reg. Sch. II:Cl. 6, Sch. II:Cl. 29
 - wave energy, electricity generation equipment, Reg. Sch. II:Cl. 43.1(d)(xiv), Sch. II:Cl. 43.2
 - wharf, Reg. Sch. II:Cl. 3, Sch. II:Cl. 6
 - • for mine, Reg. Sch. II:Cl. 10(l)
 - windmill, Reg. Sch. II:Cl. 3
 - woods assets, Reg. Sch. IV
 - • zero-emission vehicles, Reg. 1100(1)(a)(xl), (xli), Reg. 1100(2)A(e), (f)
- Capital deduction**
 - for financial institutions tax
 - • deducted in computing amount subject to tax, 190.1(1)
 - defined, 190.15
 - for large corporations tax, defined, 181.5
- Capital dividend**, 83(2)
 - account, *see* Capital dividend account
 - amalgamation, on, 87(2)(x)(ii)
 - election to treat dividend as, 83(2), (2.2)–(2.4)
 - • form and manner of making, Reg. 2101
 - • where not available, 83(2.1)
 - paid to non-resident, 212(2)(b)
 - • through trust, 212(1)(c)(ii)
 - private corporation, Reg. 2101
- Capital dividend account**
 - amalgamation, on, 87(2)(z.1)
 - corporation ceasing to be exempt, 89(1.2)
 - defined, 89(1)
 - “designated property” defined, 89(1)
 - dividend payable before May 7, 1974, ITAR 32.1(4)
 - gift by corporation, 89(1)“capital dividend account”(a)(i)(A)
 - life insurance proceeds
 - • after May 23, 1985, 89(1)“capital dividend account”(d)
 - • before May 24, 1985, 89(1)“capital dividend account”(e)
 - • exclusion from anti-avoidance rule, 83(2.3)
 - payment out of, *see* Capital dividend
 - prescribed labour-sponsored venture capital corporation, of, deemed nil, 131(11)(e)
 - where control acquired, 89(1.1)
- Capital element**
 - annuity, of, deductible, 60(a)
 - blended payment, 16(1), (4), (5); 20(1)(k) [repealed]
- Capital gain**, *see also* Capital gains and losses
 - allocation of
 - • credit union, by, 137(5.1), (5.2)
 - convertible property, 51
 - deduction, *see* Capital gains deduction
 - deemed
 - • capital gains stripping, 55(2)–(5)
 - • debt forgiveness, 80(12)
 - • negative adjusted cost base, 40(3)
 - • • of passive partnership interest, 40(3.1)
 - defined, 39(1)(a), 40(1)(a)
 - dividend instead of, on disposition of share of foreign affiliate, 93(1)
 - donation of publicly traded shares, 38(a.1)
 - • partnership interests exchangeable for, 38(a.3)
 - exchanges of property, 44
 - failure to report, 110.6(6)
 - foreign affiliate, of
 - • election re, Reg. 5902
 - income, 3
 - income-splitting tax, 120.4(4), (5)
 - life insurer’s pre-1969 property, 138(11.2)
 - listed personal property
 - • taxable net gain, 41
 - non-resident, 115(1)(b)
 - • prorating for gains before May 1995, 40(9)
 - not included in income from property, 9(3)
 - principal residence
 - • exemption, 40(2)(b)
 - • farmer’s, 40(2)(c)
 - recovery of bad debt, 39(11)
 - reserve, *see* Reserve: capital gain
 - rollover, *see* Rollover

Capital gain (*cont'd*)

- shares or exchangeable partnership interests, donation of, 38(a.1), (a.3)
 - specified, deductions for, 126(5.1)
 - split income, 120.4(4), (5)
 - stripping, 55(2)–(5)
 - taxable
 - beneficiary's, designated by trust, 104(21.2)
 - defined, 38(a), 248(1)
 - definitions, 54
 - excluded from income of certain exempt organizations, 149(2)
 - foreign affiliate, of, 95(2)(f)
 - insurer's, 138(2)(b), 142
 - net, of trust, 104(21.3)
 - partnership, of, 96(1.7)
 - trust's, designation to beneficiary, 104(21)
 - taxed
 - defined, 130(3)
 - treaty rules, Canada-U.S. Tax Treaty: Art. XIII
- Capital gains and losses**, *see also* Capital gain; Capital loss
- adjusted cost base of property owned on Dec. 31/71, ITAR 26(3), (4)
 - application of subdivision c, ITAR 26(1)
 - becoming resident, on, 128.1(1)(b)
 - ceasing to be resident, on, 128.1(4)(b)
 - deemed, from property transferred to spouse, 74.2(2)
 - deemed acquisition or disposal of property, 45
 - disposition after June 18/71 where not at arm's length, ITAR 26(5)
 - disposition before 1972, ITAR 26(5)
 - disposition subject to warranty, 42
 - disposition to corporation controlling or controlled by taxpayer, 40(2)(a)(ii)
 - dividend in kind, cost of, 52(2)
 - election re cost of property owned on Dec. 31/71, ITAR 26(7)
 - employees profit sharing plan, allocated under, 144(4)–(4.2)
 - exempt person, of, 40(2)(a)(i)
 - fair market value of securities, ITAR 26(11)
 - foreign affiliate, of, 95(2)(f)
 - foreign exchange, 39(1.1), (2)
 - identical properties, 47
 - "listed-personal-property loss" defined, 41(3)
 - lottery prize, 40(2)(f)
 - meaning of, 39(1)
 - negative adjusted cost base deemed gain, 40(3), (3.1)
 - non-resident taxpayer, 40(2)(a)(i)
 - options, *see* Option
 - partial dispositions, 43
 - personal-use property, 46
 - corporation, 46(4)
 - prizes, 52(4)
 - property whose value included in income, cost of, 52(1)
 - purchase of bond etc. by issuer, 39(3)
 - reacquired property, ITAR 26(6)
 - rollover, *see* Rollover
 - stock dividends, 52(3)
 - Valuation Day, ITAR 24, 25

Capital gains deduction, 110.6

- allowable business investment loss, interaction, with, 39(9), 110.6(1)"annual gains limit"B(b), 110.6(1)"cumulative gains limit"(b)
- anti-avoidance rules, 110.6(7)–(11)
- beneficiary of trust, 104(21.2)
- definitions, 110.6(1)
- determination of income while not resident, 110.6(13)
- double-dipping restriction, *see* Cumulative net investment loss
- election to trigger gain before corporation goes public, 48.1

- election to trigger gain on Feb. 22/94, 110.6(19)–(30); ITAR 26(29)
 - depreciable capital property
 - cost, 13(7)(e.1)
 - no recapture, 13(21)"undepreciated capital cost" F
 - excessive, 14(9) [before 2017], 110.6(19)(a)(ii)(C)(II), 110.6(22)(a)B, 110.6(28)
 - non-qualifying real property, 110.6(21)
 - option, 40(3.2)
 - partnership interest, 110.6(23)
 - penalty for late election, 110.6(29)
 - principal residence, 40(2)(b)A, D, 40(7.1)
 - shares from employee stock option, 110.6(19)(a)(i)(A)B
- failure to report gains, 110.6(6)
- indexing to inflation, 117.1(1)
- individual deemed resident in Canada, 110.6(5)
- interest expense, effect of, *see* Cumulative net investment loss
- maximum, 110.6(4)
- non-qualifying real property, defined, 110.6(1)
- other property, 110.6(3)
- partnership look-through rule, 110.6(14)(d.1)
- prescribed shares, Reg. 6205
- qualified farm or fishing property, 110.6(2)
- qualified small business corporation shares, 110.6(2.1)
- specified capital gains, 126(5.1)
- spousal trust, of, 110.6(12)
- where amount deemed proceeds of disposition rather than dividend, 183.1(7)
- where not permitted, 110.6(7), (8), (11)

Capital gains dividend

- investment corporation, Reg. 2104
- mortgage investment corporation, 130.1(4), Reg. 2104.1
- mutual fund corporation, 131(1)–(1.4), Reg. 2104
 - on taxable Canadian property, deemed dividend to non-resident, 131(5.1), (5.2)

Capital gains dividend account

- mutual fund corporation, 131(6)"capital gains dividend account"

Capital gains exemption, *see* Capital gains deduction**Capital gains pool [repealed]**

- of registered charity
 - defined, 149.1(1)

Capital gains redemptions

- mutual fund corporation, 131(6)"capital gains redemptions"
- mutual fund trust, of, 132(1)
 - defined, 132(4)

Capital gains refund

- investment corporation, 130(2)
- mutual fund corporation, to, 131(2), (3)
 - interest on, 131(3.1)
- on taxable Canadian property, deemed dividend to non-resident, 131(5.1), (5.2)
- mutual fund trust, to, 132(1), (2)
 - interest on, 132(2.1)
- on taxable Canadian property, deemed dividend to non-resident, 132(5.1), (5.2)

Capital gains stripping

- anti-avoidance rules, 55(2), (3.1)
- exemption for butterfly transaction, 55(3)(b)
 - exclusion for cross-border purchase butterfly, 55(3.1)

Capital interest (in a trust), *see* Trust (or estate): capital interest in**Capital loss**, *see also* Capital gains and losses; Net capital loss

- allowable
 - defined, 38(b)
 - foreign affiliate, of, 95(2)(f)
 - partnership, of, 96(1.7)
- bad debt, 50(1)

Capital loss (*cont'd*)

- personal-use property, 50(2)
- deduction for, 3
- defined, 39(1)(b)
- disposition of bond, etc., by corporation, 40(2)(d)
- disposition of debt, limitations on, 40(2)(e.1), (e.2), 40(2)(g)(ii)
- disposition of property to affiliated person, 40(3.3), (3.4)
- disposition of property to person controlling or controlled by corporate taxpayer, 40(3.3), (3.4)
- foreign affiliate, of, *see* Foreign accrual capital loss
- labour-sponsored venture capital corporation, disposition of shares of, 40(2)(i)
- net, *see* Net capital loss
- not included in loss from property, 9(3)
- personal-use property, 40(2)(g)(iii)
- pre-1986 balance, defined, 111(8)
- reassessment, 152(6)(a)
- restricted, 40(2), *see also* Stop-loss rules
- scientific research tax credit, unused, 39(8)
- shares of bankrupt corporation, 50(1)
- shares of controlled corporation, disposition of, 40(2)(h)
- shares of foreign affiliate, disposition of, 93(2)–(2.3), (4)
- stock savings plan, disposition of shares of, 40(2)(i)
- stop-loss rules, *see* Stop-loss rules
- superficial, 40(2)(g)(i), 54“superficial loss”
- unused share-purchase tax credit, 39(7)
- venture capital corporation, disposition of shares of, 40(2)(i)
- warranty, outlay or expense under, 42

Capital property, *see also* Disposition; Property

- adjusted cost base of, *see* Adjusted cost base
- amalgamation, on, 53(6), 87(2)(e)
- certain shares deemed to be, 54.2
- deceased taxpayer's, 70(5)
- fair market value, 70(5.3)
- defined, 54, 248(1); ITAR 26(12)“capital property”
- depreciable, *see* Depreciable property
- donation of, election for reduced proceeds of disposition
 - corporation, 110.1(2.1), (3)
 - individual, 118.1(5.4), (6)
- eligible, *see* Eligible capital property
- “eligible property” for transfer to corporation by shareholder, 85(1.1)(a)
- non-depreciable
 - change of control of corporation, 111(4)(c)–(e)
- share
 - loss on, 112(3)
- transfer of, to corporation, ITAR 26(5.2)

Capital setoff adjustment, *see* Transfer pricing capital setoff adjustment**Capital stock**

- “class” interpretation, 248(6)
- tax-deferred preferred series, Reg. 2107

Capital surplus, *see* Pre-1972 capital surplus on hand**Capital tax**

- defined, re insurance reserves, Reg. 1408(1)
- financial institutions tax, Part VI (190–190.24)
- Large Corporations Tax, Part I.3 (181–181.8)
- provincial, deductibility of, 18
- treaty restrictions, Canada-U.S. Tax Treaty:Art. XXIII

Capitalization, thin, 18(4)–(8)**Capitalization of interest**

- election, 21

Captioning services

- disability supports deduction, 64(a)A(ii)(A)
- medical expense credit, 118.2(2)(l.4)

Car, *see* Automobile; Passenger vehicle**Carbon capture, utilization and storage**

- investment tax credit, 127(9)“investment tax credit” (Proposed Amendment)

Carbon credits, *see* Emissions allowance**Carbon dioxide transmission pipeline**

- capital cost allowance, Reg. Sch. II:Cl. 49(b)

Carbon tax refunds

- to farmers, 127.42
- to individuals generally (Climate Action Incentive), 122.8
- to small businesses, *see* Proposed Amendment under 127.42

Career retraining, *see* Job retraining**Caregiver**

- tax credit, 118(1)B(d)

Caribbean Development Bank

- bonds of, qualified investment for RRSP etc., 204“qualified investment”(c.1) (formerly Reg. 4900(1)(l)(iv))

Carpenter

- apprenticeship job creation credit, 127(9)“investment tax credit”

Carrier

- defined, 146.3(1)“carrier”
- for RRIF, Reg. 215(1)

Carryback, *see also* Carryforward

- charitable donations, from year of death, 118.1(4)
- disbursement excess of charity, 149.1(20)
- effect on interest payable, 161(7), 164(5), (5.1)
- foreign accrual capital loss, Reg. 5903.1(1)(b)
- interest deduction restrictions, 18.2(1)“cumulative unused excess capacity”(b), 18.2(4)
- investment tax credit, unused, 127(5)(a), 127(9)“investment tax credit”(c)
- losses, 111(1)
 - after amalgamation, 87(2.11)
 - after emigration, against gains deemed on emigration, 128.1(8)
 - amendment to earlier return, 152(6)(c)
 - employee life and health trust, 111(7.3)
 - foreign accrual property, 152(6.1), Reg. 5903(1)(b)
 - from estate, to taxpayer's year of death, 164(6)
 - mutual fund investment of non-resident, 218.3(6)
 - RRIF, in, after death, 146.3(6.3), (6.4)
 - RRSP, in, after death, 146(8.92), (8.93)
 - RRIF losses after death, 146.3(6.3), (6.4)
 - RRSP losses after death, 146(8.92), (8.93)

Carryforward

- business losses, 111(1)(a)
- Canadian life investment losses (Part XII.3 tax), 211.1(2)
- capital losses (net capital losses)
 - against capital gains, 111(1)(b), 111(1.1)
 - against other income in year of death, 111(2)
 - defined, 111(8)“net capital loss”
 - pre-1986, against other income, 111(1.1)
- charitable donations
 - corporation, 110(1)
 - credit, 118.1(1)“total charitable gifts”
 - deduction to corporation, 110.1(1)(a)
 - first-time donor credit, 118.1(3.1)
 - individual, 118.1(1)
- deposit insurance corporation, losses of, 137.1(11)(a)
- disbursement excess of charity, 149.1(20)
- ecological donations, 110.1(1)(d)(iii), 118.1(1)“total ecological gifts”(c)
 - education credit, 118.61
 - emigration deemed gains, 128.1(8)
 - employee life and health trust losses, 111(7.3)
 - expense, against reimbursement or assistance, 12(2.2)
 - FAPI, foreign taxes against, 91(4)
 - farm land disposed of by partnership, loss on, 101

- Carryforward (*cont'd*)
 - farm losses, 111(1)(d)
 - • restricted, 111(1)(c)
 - foreign accrual capital loss, 5903.1(1)(a)
 - foreign accrual property loss, Reg. 5903(1)(a)
 - foreign affiliate's forgiven debt, 95(1)"foreign accrual property income" A.2, G
 - foreign bank's Canadian affiliate's losses, 142.7(12)
 - foreign tax credits, unused, 126(2)(a), 126(2.3), 126(7)"unused foreign tax credit"
 - gifts to charity
 - • credit, 118.1(1)"total charitable gifts"
 - • deduction to corporation, 110.1(1)(a)
 - home office expenses, undeducted, 8(13)(c), 18(12)(c)
 - interest deduction restrictions, 111(1)(a.1), 111(8)"restricted interest and financing expense"
 - interest paid on purchase of shares, 20(1)(q)(ii)
 - interest paid on student loan, 118.62:B
 - investment tax credit, 127(9)"investment tax credit"(c)–(h)
 - legal fees to obtain retiring allowance or pension benefit, 60(o.1)(i)
 - limited partnership losses, 111(1)(e)
 - listed personal property losses, 41(2)(b)
 - loss restrictions on change in control, *see* Control of corporation: change of
 - minimum tax, 120.2(1)
 - moving expenses, 62(1)(b), (c)
 - mutual fund losses of non-resident, 218.3(3)
 - net capital losses, *see* Capital loss
 - non-capital losses, 111(1)(a), 111(8)"non-capital loss"
 - non-deductible home office expenses, 8(13)(c), 18(12)(c)
 - patronage dividends, 135(2.1)
 - pre-1986 capital losses, 111(1.1)
 - RRSP contributions not yet deducted, 146(5)(a)
 - RRSP deduction room, 146(1)"RRSP deduction limit", "unused RRSP deduction room"
 - reduction of balances on debt forgiveness, 80(3), (4)
 - refundable dividend tax on hand, 129(4)"eligible refundable dividend tax on hand"(b), 129(4)"non-eligible refundable dividend tax on hand"(c)
 - repayment of support payments, 60(c.2)
 - research and development expenses, 37(1)
 - • partnership, disallowed, 96(1)(e.1)
 - restricted farm losses, 111(1)(c)
 - scientific research expenses, 37(1)
 - student loan interest credit, 118.62:B
 - surtax credit, unused
 - • against Part VI tax, 190.1(3)(b)
 - tuition credit, 118.61
- Carrying charges**
 - interest accrued on bond, 20(14)
 - interest paid, *see* Interest (monetary): deductible
 - safety deposit box rental, 9(1)
- Carrying on business in Canada**
 - extended meaning of, 253
 - non-Canadian corporations
 - • additional tax, 219
 - non-resident, 115(1)(a)
 - • liability for tax on, 2(3)(b)
 - part-year resident, 114
- Carrying value (of property)**
 - defined
 - • for notifiable-transaction rules, 237.4(10)
 - • for reportable-transaction rules, 237.3(8.2)
 - • for small business investment capital gain rollover, 44.1(1)
 - • for uncertain-tax-treatment rules, 237.5(9)
- Carryover of losses, *see* Carryback; Carryforward**
- Carve-out arrangements**
 - resource properties acquired from tax-exempt person, 66.6
- Carved-out income**
 - deduction under Part I, 66(14.6)
 - defined, 209(1)
 - partnership deemed person, 209(6)
 - tax on, 209(2)
 - • payment, 209(4)
 - • return, 209(3)
- Carved-out property**
 - defined, 209(1)
 - definitions, 209(1)
 - exclusions from, Reg. 7600
 - prescribed property, Reg. 7600
- Cash**
 - defined, for international electronic funds transfer reporting, 244.1
- Cash flow adjustment**
 - insurance corporation, Reg. 2412
- Cash method of computing income**
 - becoming non-resident, on, 28(4), (4.1)
 - COVID-19 Canada Emergency Wage Subsidy qualification, 125.7(4)(e)
 - changing from, 28(3)
 - defined, 28(1), 248(1)
 - farming or fishing business, 28(1)–(3)
 - non-resident ceasing to carry on business in Canada, 28(4), (4.1)
- Cash-out of employee stock option, 7(1)(b.1), (d.1)**
- Cash purchase ticket**
 - grain, for
 - • when amount included in income, 76(4)
- Cash register, electronic, *see* Electronic cash register**
- Cash surrender value**
 - of insurance policy, defined, 148(9), Reg. 310, 1408(1)
- Cash value**
 - defined, for Common Reporting Standard, 270(1)
- Cash value insurance contract**
 - defined, for Common Reporting Standard, 270(1)
- Casino**
 - defined, for international electronic funds transfer reporting, 244.1
- Casinos relief (COVID), Reg. 8901.1(2)(b)(xviii), *see also* Qualifying tourism or hospitality entity**
- Catalyst**
 - capital cost allowance for, Reg. Sch. II:Cl. 26
- Catch**
 - defined, Reg. 105.1(1)
- Catheters and related products**
 - medical expense credit, 118.2(2)(i.1)
- Cattle**
 - basic herd maintained since 1971, deduction, 29
 - breeding, 80.3(1)"breeding animals"
 - dairy farming, 248(1)"farming"
 - exhibiting and raising, 248(1)"farming"
 - inventory, valuation of, 28(1.2)
- Ceasing to act as agent of beneficiary**
 - constitutes disposition, 248(1)"disposition"(b)(v)
- Ceasing to be a financial institution, 142.6(1)(a), (c)**
- Ceasing to be qualifying environmental trust, 107.3(3)**
- Ceasing to be resident in Canada, *see also* Former resident**
 - attribution rule, application to deemed disposition, 74.2(3)
 - corporation, *see* Continuance outside Canada
 - deemed disposition of property, 128.1(4)(b)
 - • election for, 128.1(4)(d)
 - • instalment obligation not increased, 128.1(5)
 - • returning former resident, 128.1(6), (7)
 - • stock option income excluded, 7(1.6)

Index

- Ceasing to be resident in Canada (*cont'd*)
 - demand for payment of taxes owing, 226(1)
 - departure tax, 128.1(4)
 - additional tax on corporations, 219.1(1), 219.3
 - security for, 220(4.5)–(4.54)
 - employee life and health trust, 128.1(4)(b.1)
 - farmer or fisherman, 28(4), (4.1)
 - fiscal period end, 128.1(4)(a.1)
 - foreign tax credit after emigration, 126(2.21)
 - trust beneficiary, 126(2.22)
 - Home Buyers' Plan income inclusion, 146.01(5)
 - information return, 128.1(9)
 - Lifelong Learning Plan income inclusion, 146.02(5)
 - loss after emigration, 128.1(8)
 - moving to United Kingdom, Canada–U.K. Tax Convention Art. 13:9
 - moving to the United States, Canada–U.S. Tax Treaty:Art. XIII:6
 - payment of tax
 - election to defer, 220(4.5)–(4.54), Reg. 1301
 - post-emigration loss, 128.1(8)
 - reporting of assets, 128.1(9)
 - rollovers of shares after emigration ignored, 128.3
 - security for departure tax, 220(4.5)–(4.54)
 - seizure of goods and chattels for non-payment of tax, 226(2)
 - to pursue research under grant, 115(2)(b.1)
 - trust, deemed, 94(5)–(5.2)
 - trust deemed to dispose of property on transferor's emigration, 104(4)(a.3)
- Ceasing to carry on business**, *see also* Death of taxpayer; Sale: business, of; Winding-up
 - accounts receivable, 28(5)
 - business income of individual, effect on, 34.1(8)(a)
 - disposition of depreciable property after, 13(8), 20(16.3)
 - farming business, 28(4), (5)
 - general rules, 22–25
 - information returns to be filed, Reg. 205(2)
 - non-resident, 10(12), (14)
 - subsequent transactions
 - repayment of assistance, deduction relating to pre-2017 eligible capital expenditure, 20(1)(hh.1)
 - sale of inventory, 23(1)
- Ceasing to use inventory in business**
 - non-resident, 10(12), (14)
- Ceasing to use property in Canadian business**
 - non-resident financial institution, 142.6(1.1)
- Celiac disease patients, medical expense credit for gluten-free food costs**, 118.2(2)(r)
- Cemetery arrangements**, *see* Eligible funeral arrangement; Funeral services
- Cemetery care trust**
 - defined, 148.1(1), 248(1)
 - emigration of individual, no deemed disposition, 128.1(10)“excluded right or interest”(e)(iii)
 - excluded from various trust rules, 108(1)“trust”(e.1)
 - rollover to new trust, 248(1)“disposition”(f)(vi)
- Cemetery services**
 - defined, 248(1)
 - provision of under eligible funeral arrangements, 148.1(2)(b)(i)
- Central bank**
 - defined, for Common Reporting Standard, 270(1)
- Central paymaster**
 - provincial allocation of corporate income, Reg. 402.1
- Certificate**
 - accredited film or video production, 125.5(1), (6)
 - amount payable, re, 223(2)
 - application of, 223(1)
 - charge on land, 223(5), (6)
 - costs, 223(4)
 - registration in Court, 223(3)
 - binding under provincial laws, 223(8)
 - proceedings re, 223(7)
 - sale of property, 223(9)
 - sale of property
 - application by Minister for Federal Court order, 223(11)
 - requirements re documentation, 223(10)
 - total amount, “prescribed rate” sufficient details, 223(12)
 - before distribution of estate etc., 159(2)
 - failure to obtain, 159(3)
 - Canadian film or video production, 125.4(1)
 - change of ownership, Reg. 502
 - clearance, 159(2), (3)
 - dispositions of property by non-resident, 116(2), (4), (5.2)
 - ecologically sensitive land, 110.1(1)(d), 118.1(1)“total ecological gifts”
 - employer's, re employees' expenses, 8(10)
 - fair market value of ecological gift, 118.1(10.5)
 - oil/gas well, re, 66.1(6)“Canadian exploration expense”(d)(iv)
 - ceasing to be valid, 66.1(10)
 - ownership, 234, Reg. 207
 - participation, Canadian Wheat Board, 161(5)
- Certificate of completion**
 - defined, for Canadian film/video credit, Reg. 1106(1)
- Certification deadline**
 - defined, Reg. 1106(1)“certificate of completion”
- Certification fee paid to bank**, 20(1)(i) [repealed]
- Certifiable past service event**
 - defined, Reg. 8300(1)
- Certified feature film [repealed]**
 - defined, Reg. 1104(2)
- Certified production (pre-1996)**
 - capital cost allowance, Reg. 1100(21)–(23), Reg. Sch. II:Cl. 10(w), Sch. II:Cl. 12(n)
 - add-back for minimum tax purposes, 127.52(1)(c)
 - additional, Reg. 1100(1)(l)
 - separate class, Reg. 1101(5k), (5l)
 - defined, Reg. 1104(2)
 - information returns, Reg. 225
- Certified property, defined**, 127(9)
- Chamber of commerce**
 - exemption, 149(1)(e), 149(2)
 - information return, whether required, 149(12)
- Change in use**
 - capital property, 45
 - depreciable property, 13(7)(a), (b)
 - property of insurer, 138(11.3), (11.31)
 - research property, changed to commercial use, 127(27), (29)
- Change of address**
 - cost of, deduction, 62(3)(h)
- Change of control**
 - corporation, *see* Control of corporation: change of
 - trust, 251.2, *see* Loss restriction event
- Character conversion transaction**, *see* Derivative forward agreement
- Charging provisions**, *see* Liability for tax
- Charging station for electric vehicles**
 - capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xvii)
- Charitable activities**
 - charity must devote all resources to, 149.1(1)“charitable organization”(a)
 - defined, 149.1(1)
- Charitable donations/gifts**, *see* Gifts and donations (charitable)

- Charitable foundation.** *see also* Charity; Private foundation; Public foundation; Registered charity
- charitable purposes of, 149.1(6.1)
 - corporation controlled by, 149.1(12)
 - defined, 149.1(1), Reg. 3700
 - disbursement quota, 149.1(1)“disbursement quota”, Reg. 3701
 - deliberate reduction of, tax on, 188(3), (4)
 - political activities of, 149.1(6.1)
 - prescribed amount, 149.1(1)“disbursement quota”B(a)
 - Minister’s authority re determination of, 149.1(1.2)
 - self-dealing rules, 149.1(1)“divestment obligation percentage”, (4)(c)
 - transfer of property
 - tax on, 188(3), (4)
 - value of property, determination of, Reg. 3702
- Charitable organization.** *see also* Charity; Registered charity
- business activities of, 149.1(6)
 - penalty for carrying on unrelated business, 188.1(1)(b), 188.1(2)(b)
 - revocation for carrying on unrelated business, 149.1(2)(a)
 - charitable activities of, 149.1(6.2)
 - defined, 149.1(1)
 - designation of registered charity as, 149.1(6.3)
 - outside Canada that federal government has donated to
 - donation to, 149.1(1)“qualified donee”(a)(v)
 - by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
 - political activities of, 149.1(6.2)
 - registration of, *see* Registered charity
 - resources of, devoted to charitable activity, 149.1(6)
 - deemed, 149.1(10)
 - U.S. resident, Canada-U.S. Tax Treaty:Art. XXI
 - universities outside Canada, Reg. 3503, Reg. Sch. VIII
 - volunteers operating business, 149.1(1)“related business”
- Charities Registration (Security Information) Act**
- revocation of charity’s registration, 168(3)
 - no appeal, 172(3.1)
 - taxpayer information provided for enforcement, 241(4)(f.1)
 - use of information by RCMP, CSIS or FINTRAC, 241(9), (9.1)
 - text of, 168(3) (Notes)
- Charity.** *see also* Registered charity
- associated
 - designation of, by Minister, 149.1(7)
 - charitable purposes, defined, 149.1(1)
 - defined, 149.1(1)“charity”
 - designated as beneficiary of insurance policy, 118.1(5.2)(a)
 - disclosure of information by CRA, 149.1(15), 241(3.2)
 - disposal of ecologically sensitive land, tax on, 207.31
 - donations to, *see* Gifts and donations (charitable)
 - exemption, 149(1)(f)
 - foreign, *see* Foreign charity
 - gifts received, 149.1(12)(b)
 - grants to outside organizations that are not charities, 149.1(1)“qualifying disbursement”
 - disclosure on public information return, Reg. 3703
 - permitted, 149.1(1)“charitable organization”(a.1), 149.1(1)“charitable purposes”, 149.1(2)(b), (c), (3)(b), (b.1), (4)(b), (b.1), (4.1)(d), (21)
 - loan to donor, 118.1(16)
 - political activities, 149.1(1.1)
 - specified gifts, 149.1(1.1)
 - terrorism support, *see* Charities Registration (Security Information) Act
- Charity trusts, employees**
- receipts, Reg. 3502
- Chartered accountant.** *see* Accountant
- Chattels**
- seizure of, for unpaid tax, 225
- Cheque**
- dishonoured
 - penalty for, 220(3.8); *Financial Administration Act* s. 155.1(2)(a)
 - restarts 10-year collection limitation, 222(6)(c)
- Chief source of income**
- determination by Minister, 31
- Child.** *see also* Age; Dependant; Intergenerational transfers; Income-splitting tax; Minor
- adopted, 252(1)
 - defined, *see* extended meaning of (*below*)
 - dependent, 118(6)(a)
 - credit for, 118(1)B(d), (e)
 - disability benefit, 122.61(1)M
 - disposition of property to, 40(1.1)
 - extended meaning of, 70(10), 75.1(2), 110.6(1), 252(1); ITAR 20(1.11), 26(20)
 - family farm or fishing corporation transferred to, 70(9.3), (9.31)
 - farm or fishing property transferred to, 44(1.1), 70(9), (9.01); ITAR 26(18), (19)
 - from spouse’s trust, 70(9.1), (9.11)
 - financially dependent
 - meaning of, 146(1.1)
 - rollover of benefits paid to on taxpayer’s death
 - from RPP, 60(1)(v)(B.01)
 - from RRSP, 146(1)“refund of premiums”(b)
 - income-splitting tax, 120.4
 - infirm, credit, 118(1)B(d), (e)
 - kiddie tax, 120.4, *see also* Income-splitting tax
 - killed or missing due to crime, *see* Parent (human): compensation for child
 - maintenance payments for, *see* Support payments (spousal or child)
 - property transferred to
 - gain or loss deemed to be transferor’s, 75.1
 - support of, deemed, 56(6), (7)
- Child Benefit.** *see* Canada Child Benefit
- Child care expenses, 63**
- cross-border commuter, 63(4)
 - deduction for, 63(1), 63(2.2), 64.1
 - defined, 63(3)
 - “earned income” defined, 63(3)“earned income”
 - eligible child, 63(3)“eligible child”
 - residents absent from Canada
 - deduction, 64.1
 - school or university, attendance at, 63(2.2)
 - supporting person, 63(3)“supporting person”
 - taxpayer’s income vs. supporting person’s income, 63(2), (2.1)
- Child care space amount**
- defined, 127(9)
- Child care space creation**
- investment tax credit, 127(9)“investment tax credit”(a.5)
 - recapture if not kept for 5 years, 127(27.1)–(27.12)
- Child Disability Benefit, 122.61(1)M**
- Child fitness tax credit, *see* Children’s Fitness Credit (pre-2017)**
- Child support, *see* Support payments (spousal or child)**
- Child support amount**
- defined, 56.1(4), 60.1(4)
 - whether deductible, 60(b), 60.1
 - whether taxable, 56(1)(b), 56.1
- Child Tax Benefit, *see* Canada Child Benefit**
- Child tax credit (pre-2015), 118(1)B(b.1)**
- Children’s Arts Tax Credit (pre-2017), 118.031, Reg. 9401**
- Children’s Fitness Credit (pre-2017), 122.8**
- China, *see also* Foreign government**
- universities, gifts to, Reg. Sch. VIII, s. 14

Chinaware

- capital cost allowance for, Reg. Sch. II:Cl. 12(b)

Chiropractor, *see* Professional practice**Chose in action, as property**, 248(1)**Christmas party exemption**

- to meal and entertainment restriction, 67.1(2)(f)

Chrysler Canada Incorporated

- payments to, exception to employee life and health trust rules, Reg. 9500

Church, *see also* Charity

- clergy employed by, deduction re residence, 8(1)(c)

Citizen, *see* Canadian citizen**Civil Air Search and Rescue Association**

- volunteers, tax credit, 118.07

Civil law

- equally authoritative to common law, *Interpretation Act* 8.1, 8.2

Civil marriage, *see* Same-sex marriage**Civilian War Pensions and Allowances Act**

- pension under, exempt, 81(1)(d)

Claim liability

- defined, insurance policy reserves, defined, Reg. 1408(1)

Claim preparer (SR&ED claim)

- defined, 162(5.3)
- penalty for not disclosing, 162(5.1)
- requirement to disclose fees of, 37(11)(b)

Claim preparer information (SR&ED claim)

- defined, 162(5.3)
- penalty for not disclosing, 162(5.1)
- requirement to disclose, 37(11)(b)

Claim year

- defined, 152(6.1)(b)

Claims, unpaid, *see* Insurance corporation: reserve: unpaid claims; Insurance corporation: unpaid claims reserve adjustment**Class of animal**

- defined, Reg. 1802(5)

Class of beneficiaries

- defined, for employee life and health trusts, 144.1(1)

Class of shares

- includes series, 248(6)

Classes of property, *see* Capital cost allowance**Classification society**

- defined, Reg. 3600(2)

Clawback

- capital cost allowance, *see* Recapture
- deduction from income for, 60(w)
- disposition of labour-sponsored funds share, 211.8(1)
- old age security, 180.2
- unemployment benefits, deduction, 60(v.1)

Clean energy investments, Reg. Sch. II:Cl. 43.1**Clear days**

- calculation of, *Interpretation Act* 27(1)

Clearance certificate, 159(2)

- failure to obtain, 159(3)

Clearing or levelling farm land

- cost deductible, 30

Clergy

- allowance received by, deduction, 6(1)(b)(vi)
- residence, expense deductible, 8(1)(c)
- employer's certificate required, 8(10)
- travelling allowance not taxable, 6(1)(b)(vi)

Clerical services

- no application of penalty for misrepresentation, 163.2(9)

Client

- defined, for international electronic funds transfer reporting, 244.1
- privilege, *see* Solicitor-client privilege

Climate Action Incentive, 122.8

- liability for refund of overpayment, 160.1(1.2)

Closing business, *see* Ceasing to carry on business**Closely held corporation**

- defined, for non-resident trust rules, 94(1)

Club

- country club, no COVID extended tourism relief, Reg. 8901.1(2)(b)(ix)(B)
- dues, no deduction, 18(1)(i)(ii)
- exemption for, 149(1)(l), 149(2)
- deemed a trust, 149(5)
- information return required, 149(12)

Coaching services, *see* Job coaching services**Coal**, *see also* Mineral resource

- included in definition of "mineral", 248(1)
- mine, allocation of depletion allowance, 65(3)

Coal mine operator

- defined, Reg. 1104(2), 1206(1)
- services rendered by, Reg. 1104(6.1), 1204(3)(c)

Cod fishermen, *see* Fishing: compensation programs**Cogeneration**

- energy systems, Reg. Sch. II:Cl. 43.1(c)(i)

Cohabiting spouse or common-law partner

- death of, notice to CRA required, 122.62(5)(a)
- defined, 122.5(1), 122.6, 122.7(1), 122.8(1)
- person becoming, notice to CRA required, 122.62(7)(a)
- separation from, notice to CRA required, 122.62(6)(a)

Collateralized preferred shares

- restriction on dividend deductibility, 112(2.4)

Collection agreement

- application of payments under, 228

Collection-commencement day

- defined, 225.1(1)

Collection of tax, 222–229

- acquisition of tax debtor's property, 224.2
- by Internal Revenue Service, Canada-U.S. Tax Treaty:Art. XXVI-A
- debt to Her Majesty, as, 222(2)
- deduction or set-off, by, 224.1
- garnishment, 224
- in jeopardy, 164(1.2)–(1.31)
- proceedings, 225.2
- judge's powers, 225.2(11), (12)
- judicial review of authorization, 225.2(8)–(11)
- no appeal therefrom, 225.2(13)
- interference with official, 231.5(2)
- limitation period, 10 years, 222
- payment of moneys seized from tax debtor, 224.3
- requirement to disclose information, 231.2(1)
- requirement to provide foreign-based document, 231.6(1)
- restricted while objection or appeal underway, 225.1
- seizure of chattels, 225
- taxpayer leaving Canada or defaulting, 226

College, *see* Tuition fees; University**Collins case overruled**, 143.4**Colostomy pads, as medical expense**, 118.2(2)(i)**Combustion turbine**

- capital cost allowance, Reg. Sch. II:Cl. 48

Comfort letters, *see* Table of Comfort Letters**Commencement**

- defined, *Interpretation Act* 35(1)

Commencement day

- defined, 56.1(4), 60.1(4)

Commercial debt obligation, *see also* Commercial obligation

- deemed issued where amount designated following debt forgiveness, 80.03(7)(b)(i)
- defined, 80(1), 80.01(1), 80.02(1), 80.03(1)(a), 80.04(1)
- exchanged for other commercial debt obligation, 80(2)(h)
- issued by partner, 80(2)(n)
- issued by partnership, 80(15)
- joint liability for, allocation, 80(2)(o)
- settled by deceased's estate, 80(2)(p), (q)

Commercial obligation, *see also* Commercial debt obligation

- debt forgiveness
 - defined, 80(1), 80.01(1), 80.02(1), 80.03(1)(a), 80.04(1)
 - disposition of in exchange for another issued by same person, 40(2)(e.2)
 - addition to adjusted cost base, 53(1)(f.12)
- foreign tax credit
 - defined, 126(7)

Commercial traveller, *see* Salesperson**Commission**

- mutual fund, limited partnership financing, 18.1
- unearned, reserve for, 32
- withholding tax, 153(1)(g), Reg. 102(2), (5)

Commission agent

- deductions, 8(1)(f)
 - automobile or aircraft costs, 8(1)(j), 8(9), 13(11)
 - certificate of employer, 8(10)

Commissioner of Revenue

- appointed, *Canada Revenue Agency Act* s. 25
- authorized to exercise powers of Minister, 220(1)

Commitment time

- defined, 20.3(1)“weak currency debt”

Committee, return by, *see also* Legal representative

- deemed to be legal representative, 248(1)“legal representative”
- obligations of, 159
- return required by, 150(3)

Common carrier

- railway assets, capital cost allowance, Reg. 1100(1)(z.1c), 1101(5d.2), Reg. Sch. II:Cl. 35

Common law

- equally authoritative to civil law, *Interpretation Act* 8.1, 8.2

Common-law partner, *see also* Spouse

- defined, 248(1)
- transfer of property to, 160(1)

Common-law spouse, *see* Common-law partner**Common question**

- appeal of one taxpayer binding on others, 174

Common Reporting Standard, 270–281

- definitions, 270(1)
- financial institution due-diligence requirements, 272–277
- financial institutions required to report non-residents' accounts, 271, 278
 - excluded accounts, 270(1)“excluded account”, Reg. 9006
 - prescribed excluded accounts, Reg. 9006
 - prescribed non-reporting financial institutions, Reg. 9005

Common share, *see also* Share

- consideration for property transferred to corporation, 85(1)(h)
- defined
 - for small business investment capital gain rollover, 44.1(1)
 - generally, 248(1)

Commonwealth

- defined, *Interpretation Act* 35(1)

Communal organization

- definitions, 143(4)
- election to allocate gifts to members, 143(3.1)

- rollover to new trust, 248(1)“disposition”(f)(vi)
- rules re, 143(1)
- specification of member of family, effect of, 143(5)
- taxable income, election re, 143(2), (3)

Communication of information (by CRA), 241

- Canada Child Benefit, 241(4)(j.2); Reg. 6500
- charities and RCAAAs, regarding, 149.1(15), 241(3.2)
- offence of unauthorized use or disclosure, 239(2.2)–(2.22)
- police officer, to, 241(4)(p)
- prohibition against, 241(1), (2)
- statistical purposes, 241(1)(d)(ix), 241(4)(e)(x), 241(4)(o)

Community Development bonds, eligible for RRSP investment, Reg. 4900(1)(i.1)**Community Economic Development Corporation (Nova Scotia)**

- qualified investment for deferred income plans, Reg. 4900(1)(i.11)

Community Heroes benefit

- tax-free benefit to families, 81(1)(j)

Commutation of annuity, payment on

- source withholding, 153(1)(f)

Commutation of benefits, pension plan, Reg. 8503(2)(m), (n), 8503(2.1)

- insolvent employer
 - rollover to RRSP, 146(5.2), (5.201)
 - transfer to another RPP, Reg. 8517(3)–(3.02)

Commuter to United States

- charitable gifts, 118.1(9)
- child care expenses, 63(4)
- retirement plan contributions, Canada-U.S. Tax Treaty:Art. XVIII:14
- tuition credit, 118.5(1)(c)
 - transfer of, to supporting person, 118.9(1)

Compact discs, *see* Audio tapes or CDs**Companies' Creditors Arrangement Act**

- provisions override third-party garnishment, 224(1.2)

Company, *see also* Corporation

- defined, Canada-U.S. Tax Treaty:Art. III:1(f)

Compensation

- capital property, for, 54“proceeds of disposition”
- certain payments exempt, 81(1)(d)
- cod fisherman *see* Fishing: compensation programs
- defined for RPP purposes, 147.1(1), Reg. 8507
- depreciable property, for, 13(21)“proceeds of disposition”
- from Federal Republic of Germany, exempt, 81(1)(g)
- limits pension contribution, 147.1(8), (9)
- payment, *see* Securities lending arrangement: compensation payment
- taxable, 5, 6, 9
- to customer or client, trust income exempt, 149(1)(w)

Compete, agreement not to, *see* Restrictive covenant (or non-competition payment)**Competent authority**

- agreement based on tax treaty deemed valid, 115.1
- arbitration of disputes, Canada-U.S. Tax Treaty:Art. XXVI:6
- defined, Canada-U.S. Tax Treaty:Art. III:1(g); Canada-U.K. Tax Treaty:Art. 3:1(f)
- exchange of information, Canada-U.S. Tax Treaty:Art. XXVII
- mutual agreement procedure, Canada-U.S. Tax Treaty:Art. XXVI

Complaint, *see* Information or complaint**Complete period of reduced services**

- defined, Reg. 8300(1)

Completion

- defined, Reg. 1104(2)
- of a specified oil sands mine development project, defined, 66.1(6)

Completion (*cont'd*)

- of a specified development phase of a taxpayer's oil sands project, defined, Reg. 1104(2)

Completion date (for qualifying home under Home Buyers' Plan)

- defined, 146.01(1)

Compliance order

- after conviction of offence, 238(2)
- compliance with audit or demand, 231.7
- time contesting, not to count for reassessment clock, 231.8

Compound interest

- deduction for, 20(1)(d)
- late payments and refunds, 248(11)

Compression equipment

- capital cost allowance, Reg. Sch. II:Cl. 7(j), Sch. II:Cl. 7(k)

Computation of income, 3

- amalgamation, on, 87(2)(c)
- deductions, *see* Deductions in computing income; Deductions in computing income from business or property; Deductions in computing income from office or employment
- insurance corporation, 138(1)–(6), (9)
- limitation re inclusions and deductions, 248(28)
- non-resident insurer, 138(11.91)
- where insurance business transferred, 138(11.92)

Computation of tax, Reg. Part I

- corporations, 123–125.1
- deductions, *see* Deductions in computing tax
- individuals, 117–122.91
- rates, 117(2)
- Part I
- non-resident individual, 118.94

Computer

- accounting records kept on, retention requirement, 230(4.1)
- exemption, 230(4.2)
- capital cost allowance
- general, Reg. Sch. II:Cl. 50
- “general-purpose electronic data processing equipment” defined, Reg. 1104(2)
- manufacturing and processing equipment, Reg. Sch. II:Cl. 29
- network equipment, *see* Data network infrastructure equipment
- separate class for each property, Reg. 1101(5p)
- excluded from apprentice vehicle mechanics' deduction, 8(6)(b)(iv)
- excluded from tradesperson's tools deduction, 8(6.1)(d)
- filing by, *see* Electronic filing
- software, *see* Software

Computer-operating aids for blind person

- disability supports deduction, 64(a)(ii)(C)
- medical expense credit, Reg. 5700(o)

Computer software, *see also* Software

- defined, Reg. 1104(2)

Computer software tax shelter property [repealed], *see* Computer tax shelter property**Computer tax shelter property**

- CCA claims limited to income from property, Reg. 1100(20.1)
- defined, Reg. 1100(20.2)
- excluded from leasing property rules, Reg. 1100(17)(b)
- separate class, Reg. 1101(5r)

Concerts relief (COVID), Reg. 8901.1(2)(b)(iv), *see also* Qualifying tourism or hospitality entity**Concession**

- capital cost allowance, Reg. 1100(1)(c), 1100(9), Reg. Sch. II:Cl. 14
- exchange of, election, 13(4.2), (4.3)

Concrete finisher

- apprenticeship job creation credit, 127(9)“investment tax credit”

Conditional sale, repossession, *see* Surrender: of property to creditor**Condominium corporation, 149(1)(l)****Confederation Life failure**

- group disability insurance top-up payments, 6(17), (18)
- reimbursement payment to employer, 8(1)(n.1)

Confidential protection

- defined, for reportable transaction rules, 237.3(1)

Confidentiality, *see* Communication of information; Solicitor-client privilege**Congregation, *see* Communal organization****Connected**

- contributor, *see* Connected contributor
- defined
- for Part IV tax, 186(4)
- extended definition applies to other provisions, 186(7)
- for shareholder loans, 15(2.1)
- partnership, *see* Connected partnership
- person, *see* Connected person
- shareholder, *see* Connected shareholder

Connected affiliate

- defined, for foreign affiliate dumping rules, 212.3(16)(b)(ii)

Connected contributor

- defined, 94(1)

Connected partnership

- defined
- for FAPI stub-period rules, 91(1.3)

Connected person

- defined
- for deferred income plan qualified investments, Reg. 4901(2)
- for FAPI stub-period rules, 91(1.3)
- for straddle transaction rules, 18(17)“offsetting position”

Connected person or partnership

- defined, for upstream loan rules, 90(4)

Connected shareholder

- defined, Reg. 4901(2)–(2.2)

Conservation, *see* Energy: conservation property**Conservation of the environment, *see* Ecological gifts****Consequence of the death of an individual**

- meaning of, 248(8)
- **Consideration, *see also* Inadequate consideration**
- unreasonable
- from non-resident, 247
- rent, royalty, etc.
- non-resident, paid by, 247
- non-resident, paid to, 247
- whether trust interest acquired for consideration, 108(7)

Consolidated financial statements

- defined
- for alternative interest-deduction restrictions, 18.21(1), (4)
- for country-by-country reporting, 233.8(1)
- for stock option limits, 110(0.1), 233.8(1)
- for uncertain-tax-treatment rules, 237.5(1)

Consolidated group

- defined, for alternative interest-deduction restrictions, 18.21(1), (4)
- anti-avoidance rule, 18.21(6)
- of foreign affiliates, surplus calculations, Reg. 5907(1.1)

Consolidated net surplus rules

- transitional (for FAPI), 92(1.2)–(1.5)

Consolidation (of shares)

- effect on stock option rules, 110(1.5)

Consolidation accounting method

- prohibited for debt forgiveness reserve, 61.3(1)(b)C(i)
- prohibited for purposes of Act, 248(24)

Consoltex Inc. case overruled, 127(27)**Constituent entity**

- defined, for country-by-country reporting, 233.8(1)

Constitutionality of Income Tax Act, 2(1) (Notes)**Construction activities**

- defined, Reg. 238(1)
- information return required, Reg. 238(2)

Construction contracts

- information return, Reg. 238

Construction electrician

- apprenticeship job creation credit, 127(9)“investment tax credit”

Construction equipment

- “qualified” defined, 127(9)

Construction of building

- home for disabled person, medical expense, 118.2(2)(1.21)
- soft costs, rules, 18(3.1)–(3.7), 20(29)

Construction work camp

- deduction for meals at, 67.1(2)(e.1)
- exemption for board, lodging and transportation, 6(6)

Constructive receipts

- indirect payments, 56(2)

Consul, *see* Diplomat**Consumer goods or services**

- defined, 135(4), Reg. 4901(2)

Consumer Price Index

- defined, Reg. 8500(1)

Consumer Price Index adjustment, *see* Indexing (for inflation)**Consumer’s Gas case overruled**, 12(1)(x)**Contact information**

- defined, re disclosure of taxpayer information, 241(10)
- disclosure of, 241(4)(1)

Containers

- deposit received for, income, 12(1)(a)(ii)
- repayment of, deductible, 20(1)(m.2)
- reserve for, deductible, 20(1)(m)(iv)

Contemplated shareholder

- defined, for shareholder-benefit rules, 15(1.4)(a)

Contemporaneous documentation

- required for transfer pricing audit purposes, 247(4)

Contiguous zone

- defined, *Interpretation Act* 35(1)

Continental Bank of Canada case overruled re Crown raising new issue on appeal, 152(9)**Continental shelf**

- application of legislation to, *Interpretation Act* 8(2.2)
- defined, *Interpretation Act* 35(1)

Contingency funds, Reg. 3202**Contingent amount**

- defined, 143.4(1)
- excluded from expenditures, 143.4(2)

Contingent liability

- limitation on deductibility, 18(1)(e), 143.4(2)

Continuance outside Canada, 219.1, 250(5.1)

- treaty rule, Canada-U.S. Tax Treaty:Art. IV:3

Continuity

- previous version of Act, ITAR 75, 77

“Contra” interest

- on instalment payments, 161(2.2)

Contract

- annuity, *see* Annuity contract

- employment, consideration for entering into, 6(3)
- investment, *see* Investment contract
- life annuity, 148(10)
- payments under, combined income and capital, 16(1)
- pension plan, under, 254
- person employed to negotiate
 - expenses incurred, deduction, 8(1)(f)
 - certificate of employer, 8(10)
- rectification of, 169(1) (Notes)

Contract payment

- by federal government or Crown corporation, information return, Reg. 237
- defined, 127(9), (25)
- included in income, 9(1), 12(1)(x)
- paid, not counted as qualifying for ITC, 127(18)
- prescribed amount, Reg. 4606

Contract service margin

- IFRS rules for insurers, 138(1) (Proposed Amendments)

Contract to provide information to CRA, *see* Informant payments**Contractors’ movable equipment**, Reg. Sch. II:Cl. 10(h), Sch. II:Cl. 22, Sch. II:Cl. 38**Contractual protection**

- defined, for reportable transaction rules, 237.3(1)

Contravene

- defined, *Interpretation Act* s. 35(1)

Contributed property**Contributed surplus**

- addition to adjusted cost base, 53(1)(c)
- calculation of, 84(10), (11)
- conversion into paid-up capital
 - amalgamations, 87(2)(y)
 - no dividend deemed, 84(1)(c.1)–(c.3)
 - restrictions, 84(10)

Contribution

- charitable, *see* Gifts and donations (charitable)
- defined
 - for non-resident trusts, 94(1), 94(2)(s)–(u)
 - for political contributions, Reg. 2002(1)
- political, *see* Political contribution
- to RESP, defined to exclude CESG, 146.1(1)

Contributor

- defined
 - for affiliated-person rules, 251.1(3)
 - for non-resident trusts, 94(1)
 - re disposition to trust, 107.4(1)

Control of corporation, 112(6)(b), 256(1.2), *see also* Associated corporations

- 75% of value counting as control, 256.1
- acquired after beginning of year, investment tax credit, 127(9.2)
- acquired before end of year, investment tax credit, 127(9.1)
- acquisition of, *see also* change of (below)
 - because of death, effect on windup, 88(1)(d.3)
 - deemed time of, 256(9)
 - exceptions, 256(7)(a)
- amalgamation deemed not acquisition of, 88(4)
- certain shares excluded from fair market valuations, 256(1.6)
- change of, *see also* Loss restriction event
 - adjusted cost base of non-depreciable capital property, 53(2)(b.2)
 - adventure in the nature of trade, inventory writedown, 10(10)
 - application of unused surtax credit, 190.1(6)
 - bad debts non-deductible, 111(5.3)
 - business investment losses, 111(8)“net capital loss”C(b)
 - Canadian resource expenses, reduction of, 66.7(12)

Control of corporation (*cont'd*)

- Canadian resource property acquired within 12 months, 66(11.4), (11.5)
- capital dividend account set to zero, 89(1.1)
- change in trustees of trust controlling corporation, 256(7)(i)
- charitable donations, 110.1(1.2)
- debt forgiveness rules, 80(1)“relevant loss balance”(d), (e)
- deductions for previously disallowed pregnant losses, 13(21.2)(e)(iii)(D), 14(12)(f) [before 2017], 18(15)(b)(iii), 40(3.4)(b)(iii)
- deemed year-end, 249(4)
- depreciable property acquired in 12-month period, 13(24), (25)
- election re cost of capital property, 111(4)(e)
- exploration and development expenses, 66(11.4), (11.5)
- foreign affiliates owned by corporation, Reg. 5905(5.2)
- foreign currency debt, gain or loss, 40(10), (11), 111(12), (13)
- foreign resource property acquired within 12 months, 66(11.4), (11.5)
- inventory writedown for adventure in the nature of trade, 10(10)
- investment tax credit, 127(9.1), (9.2)
- loss carryover rules, 111(4)–(5.5)
- anti-avoidance provision, 111(5.5)(b)
- losses, deductibility, 111(5)–(5.4)
- meaning of, 256(6)–(9), 256.1
- NISA Fund No. 2 deemed paid out, 12(10.4)
- net capital loss non-deductible, 111(4)
- non-depreciable capital property, rules re, 111(4)(c)–(e)
- non-successor acquisitions of resource properties, 66.7(15)
- resource expenses, 66.7(10), (11)
- scientific research and experimental development expenses, 37(1)(h), 37(6.1)
- superficial loss rule inapplicable, 54“superficial loss”(f)
- windup, 88(1)(c.3), (c.6)
- within 12 months of incorporation, 66(11.5)
- corporation without share capital, 256(8.1)
- deemed not acquired, 256(7)
- defined
 - directly or indirectly, 256(5.1)
 - for associated corporation rules, 256(6)
 - for Part IV tax, 186(2)
 - for stop-loss rules, 112(6)(b)
 - in fact, 256(5.1)
 - option, by, 251(5)(b)
 - related groups, by, 251(5)(a)
 - specified class of shares, defined, 256(1.1)

Controlled corporation, *see also* Corporation

- meaning, 256(5.1)

“Controlled, directly or indirectly”

- meaning, 256(5.1)

Controlled foreign affiliate, *see also* Foreign affiliate

- defined, 95(1), 248(1), Reg. 5907(1)
- for loan by corporation to non-resident, 17(15)
- non-resident trust deemed to be, 94.2(2)
- eligible, *see* Eligible controlled foreign affiliate
- income earned by, taxed, 91(1), *see also* Foreign accrual property income
- payment to, for services, constitutes FAPI, 95(2)(b)

Controlled foreign company tax regime

- defined, for hybrid mismatch arrangement rules, 18.4(1)

Controlling individual

- of RRSP, RRIF, TFSA, RESP or RDSP, defined, 207.01(1)
- tax on, 207.04(1), 207.05(1)

Controlling persons

- defined, for Common Reporting Standard, 270(1)

Convention, *see* Tax treaty**Convention expenses**

- deductible, 20(10)
- where fee includes meals, 67.1(3)
- disallowed as R&D expense, Reg. 2902(a)(i)(F)
- held in United States, Canada–U.S. Tax Treaty, Canada–U.S. Tax Treaty:Art. XXV:8

Convention organizer relief (COVID), Reg.

- 8901.1(2)(b)(xx)(A), *see also* Qualifying tourism or hospitality entity

Convention refugee, *see* Refugee**Conventional lands**

- defined, 1206(1)

Conversion

- benefit, *see* Conversion benefit
- bond, deemed cost of, 51.1
- debt into debt (commercial debt obligation), 80(2)(h)
- debt into shares, 51, 80(2)(g), (g.1)
- provincial life insurance corporation to mutual, 139
- shares into other shares, 86(1)
- vessel, of
 - defined, 13(21)“appropriate minister”, “conversion” and “conversion cost”

Conversion benefit

- defined, for insurance demutualization, 139.1(1)
- flow-through by employer to employee, 139.1(16)
- taxable, *see* Taxable conversion benefit

Conversion cost

- vessel, of
 - deemed separate class, 13(14), (17)
 - defined, 13(21)“appropriate minister”, “conversion” and “conversion cost”

Convertible debenture, *see* Convertible property**Convertible obligation**, 51.1**Convertible property**, 51; ITAR 26(24)

- benefit conferred on non-arm’s length person, 51(2)
- “gift portion” of, 51(2)

Cook

- apprenticeship job creation credit, 127(9)“investment tax credit”

Cooling-off period

- three years, labour-sponsored funds tax credit, 127.4(3)

Cooperative corporation, 135, 136

- farming or fishing, small business deduction on sales to, 125(7)“specified cooperative income”
- investment tax credit, 127(6)
- paid-up capital of, 89(1)“paid-up capital”(b)
- patronage dividends, 135
 - deduction, 20(1)(u)
 - non-resident, to, 212(1)(g)
- scientific research tax credit, 127.3(5)
- share of, meaning, 248(1)“share”

Coopers & Lybrand case overruled, 227(5)**Copy of document**

- can be used in court proceedings, 231.5(1), 244(9)

Copyright

- owner, *see* Copyright owner
- royalties paid to non-resident, exempt, 212(1)(d)(vi), 212(9)(b)
- paid to U.K. resident, Canada–U.K. tax treaty Art. 12:3(a)
- paid to U.S. resident, Canada–U.S. Tax Treaty:Art. XII:3(a)

Copyright owner

- defined, for film credit CCA rules, Reg. 1106(1), (12)
- effect on availability of film credit, Reg. 1106(1)“excluded production”(a)(iii)(A)

Coronavirus, *see* COVID-19**Corporate distributions tax**, 183.1**Corporate emigration**, 219.1

Corporate information

- defined, re disclosure of taxpayer information, 241(10)
- disclosure of, 241(4)(1)

Corporate officers

- accountability of, 242
- loans to, 80.4(1)

Corporate partnerships

- small business deduction, 125(6)

Corporate surplus, *see* Surplus stripping**Corporate surtax (before 2008)**, 123.2**Corporate tax reduction**, *see* Corporation: tax rate**Corporation**

- acquiring depreciable property
- change of control in 12-month period, 13(24), (25)
- acquisition of control, *see* Control of corporation: change of
- acquisition of own shares, deemed dividend, 84(3)
- additional tax on excessive election, 184
- airline, taxable income earned in a province, Reg. 407
- allowance, re investment in property in Canada, 219(1)(j), Reg. 808
- amalgamation of, *see* Amalgamation
- annuity contract, interest in, 12.2
- appropriations of property by shareholders, 15(1), 69(4)
 - inadequate considerations, 69(5)
- appropriations to shareholders
 - on winding-up, deemed dividend, 84(2), (6)
- assets disposed of to, for shares
 - shares deemed capital property, 54.2
- associated, *see* Associated corporations
- bankrupt
 - exempt from Part IV tax, 186.1
 - rules applicable, 128(1)
- becoming or ceasing to be exempt, 149(10)
 - superficial loss rule inapplicable, 54“superficial loss”(g)
- becoming resident in Canada, 128.1(1)
- benefit conferred on shareholder, 15(1), (7)
 - deemed, 15(9)
- bus operators, taxable income earned in a province, Reg. 409
- buying back shares for excessive amounts
 - excess deemed dividend substitute, 183.1(3), (4)
- “Canadian”
 - defined, 89(1)
 - “taxable” defined, 89(1)“taxable Canadian corporation”
- winding-up of, rules, 88(2)
- Canadian-controlled private, defined, 125(7)
- cancellation of shares, 84(3), (6)
- ceasing to be resident in Canada, 128.1(4)
- change of control, *see* Control of corporation: change of
- charitable donations deduction, 110.1
- connected, 186(4)
- consolidation accounting method, prohibited, 248(24)
- continuance outside Canada, 219.1, 250(5.1)
- control of, *see* Control of corporation
- controlled, 186(2)
 - capital loss on property transferred to, 40(3.3), (3.4)
 - charitable foundation, by, 149.1(12)
 - disposition of shares of
 - amalgamation, 87(2)(kk)
 - exchanges of property, 44(7)
 - share for share exchange, 85.1(2)(b)
 - shares of, disposition of, 40(2)(h)
 - cooperative, *see* Cooperative corporation
 - Crown, *see* Crown corporation
 - deduction from tax, *see* Deductions in computing tax
 - deemed member of partnership, 125(6.1)
 - deemed not resident, 250(5)
 - deemed resident in Canada, 250(4)

- defined, 248(1), *Interpretation Act* s. 35(1)
- director of, *see* Director (of corporation)
- distributions, tax payable on, 183.1(2)
 - exceptions, 183.1(6)
- divided business, Reg. 412
- dividend received by, 112
 - dividend rental arrangements, no deduction allowed, 112(2.3)
 - short-term preferred share, on, 112(2.3)
 - where no deduction permitted, 112(2.1)–(2.9)
- emigration of, 219.1
- execution of documents, 236
- exempt, *see* Exempt corporation; Exemptions
- family farm or fishing, *see* Family farm or fishing corporation/partnership
- farm loss
 - carryforward rules where control changed, 111(5)–(5.3)
- fiscal period of, 249.1(1)(a), 249.1(1)(b)(iii)
- foreign business corporation, *see* Foreign business corporation
- gifts made by
 - capital property, election for lower proceeds, 110.1(2.1), (3)
 - charitable, 110.1(1)(a)
 - deduction for, 110.1(1)
 - institution, to, 110.1(1)(c)
 - partnership, by, 110.1(4)
 - proof of, 110.1(2)
- grain elevator operators
 - taxable income earned in a province, Reg. 408
- housing
 - exemption, 149(1)(i), (n)
- immigration of, 128.1
- income of, defined, 125(7)“income of the corporation for the year from an active business”
- incorporated in Canada, defined, 248(1)“corporation”, “corporation incorporated in Canada”
- indirect payment to person paid through intermediary as proceeds of disposition of property, 183.1(5)
- information return
 - by private corporation, under Part IV, 187(1)
- instalment payment of tax, 157(1), Reg. 5301
 - “first instalment base” defined, 161(9)(b)
 - insufficient, 161(2)
 - limitation, 161(4.1)
 - “second instalment base” defined, 161(9)(b)
- insurance, *see* Insurance corporation
- interest
 - accrued, 12(3)
 - deduction by certain corporations, 18(4)–(8)
- investment, *see* Investment corporation
- issue of stock rights, 15(1)(c)
- joint exploration, *see* Joint exploration corporation
- large, tax on, *see* Large corporations tax (Part I.3)
- life insurance, *see* Life insurance corporation; Life insurer
- life insurance policy, interest in, 12.2
- loan by
 - non-resident, from, 90(6)–(15)
 - non-resident, to, 17
 - persons connected with shareholder, to, 15(2)
 - shareholder, to, 15(2)
 - between non-residents, 15(2.2)
 - from foreign affiliates, 90(6)–(15)
 - wholly-owned subsidiary, to, 218
- loan to, attribution rules, 74.4
- manufacturing and processing, 125.1
- member of non-resident-controlled partnership
 - specified partnership income deemed nil, 125(6.2)
- mortgage investment, 130.1
- municipal, exempt, 149(1)(d.5)
- mutual

Index

- Corporation (*cont'd*)
 - provincial life insurance corporation converted into, 139
 - mutual fund, *see* Mutual fund corporation
 - mutual insurance, exemption, 149(1)(m)
 - net capital loss non-deductible if change in control of, 111(4)
 - 90% or more owned subsidiary
 - winding-up of, 88(1)
 - non-arm's length non-resident, transactions with
 - extended reassessment period, 152(4)(b)(iii)
 - return required, 233.1
 - offences and penalties, 162(10)
 - non-capital loss
 - carryforward rules where control changed, 111(5)–(5.4)
 - non-profit
 - exemption, 149(2)
 - for scientific research and development
 - annual information return, 149(7)
 - exemption, 149(1)(j)
 - non-resident, Reg. Part VIII
 - branch tax, 219
 - carrying on business in Canada, additional tax, 219
 - limitations on, 219.2
 - taxable income earned in a province, Reg. 413
 - officer of, prosecution for offence of corporation, 242
 - paid-up capital, *see* Paid-up capital
 - partner
 - inclusion of income from partnership, 96(1)
 - inclusion of stub-period income from partnership, 34.2(2)
 - patronage dividend
 - deduction, 135
 - paying dividends on taxable preferred shares
 - tax payable, 191.1(1)
 - payment of tax, 157
 - instalments, 157(1)
 - where instalments not required, 157(2.1)
 - payments to shareholders or prospective shareholders, 15(1), (7)
 - pension, exempt, 149(1)(o.1), (o.2)
 - personal-use property of, 46(4)
 - pipeline operators, taxable income earned in a province, Reg. 411
 - powers vested in, *Interpretation Act* s. 21(1)
 - predecessor, *see* Predecessor corporation
 - preferred-rate amount
 - credit union, 137(4.3)
 - private, *see* Private corporation
 - professional, *see* Professional corporation
 - property appropriated to shareholder or prospective shareholder, 15(1), (7)
 - provincial, exempt, 149(1)(d)–(d.4)
 - provincial life insurance, converted into mutual, 139
 - qualified small business, share of
 - capital gains deduction, 110.6(2.1)
 - defined, 110.6(1)
 - related person, 110.6(14)
 - rules re, 110.6(14)
 - railway, *see also* Railway
 - rates of tax, *see* Rates of tax
 - real property rental etc.
 - base level deduction, 18(2)(f), 18(2.2)
 - receiving dividends on taxable preferred shares
 - tax payable, 187.2
 - redemption of shares, 40(3.6), 84(3), (6)
 - reduction of paid-up capital, deemed dividend, 84(4), (4.1)
 - registered investment, 204.4–204.7
 - related to another, 251(3)
 - deemed, on amalgamation, 251(3.1), (3.2)
 - transfer of liability for Part VI.1 tax, 191.3
 - where deemed not, 112(2.9)
 - reorganization of business, *see* Reorganization
 - residence of, 250(5)
 - corporate emigration, 219.1
 - extended meaning, 250(4)
 - returns
 - to be filed, 150(1)(a), (e)
 - where none filed, 150(1)(e)
 - rules applicable to, 123–125.1
 - scientific research and development (non-profit)
 - annual information return, 149(7)
 - exemption, 149(1)(j)
 - rules as to income, 149(9)
 - share-for-share exchange
 - computation of paid-up capital, 85.1(2.1)
 - ship operators, taxable income earned in a province, Reg. 410
 - small business deduction, 125
 - small business investment, Reg. 5101(1)
 - exempt, 149(1)(o.3)
 - spouse or minor, for
 - property transferred or loaned to
 - amalgamation, corporation continued on, 87(2)(j.7)
 - status of certain corporations, ITAR 50, Reg. Part XLVIII
 - “stop-loss” rule, 112(3)–(7)
 - subject, 186
 - deemed private corporation, 186(5)
 - subsidiary, *see* Subsidiary
 - successor, *see* Successor corporation
 - surtax (before 2008), 123.2
 - tax abatement, 124
 - tax on excessive capital dividend or capital gains dividend election, 184, 185
 - tax on excessive eligible dividend designation, 185.1, 185.2
 - tax rate, 123
 - abatements, 124
 - manufacturing or processing, 125.1
 - reductions (general), 123.4
 - small business deduction, 125
 - surtax (before 2008), 123.2
 - taxable Canadian, defined, 89(1)“taxable Canadian corporation”
 - taxable income earned in a province, Reg. Part IV
 - divided businesses, Reg. 412
 - taxation year of, 249(1)(a), 249(3)
 - thinly capitalized
 - interest not deductible, 18(4)–(6)
 - transactions with non-resident, non-arm's length persons
 - extended reassessment period, 152(4)(b)(iii)
 - information return, 233.1
 - offences and penalties re, 162(10)
 - transfer of property to
 - attribution rules, 74.4
 - partnership, from, 85(2)
 - shareholder, from, 85(1)
 - eligible property, 85(1.1)
 - truck operators, taxable income earned in a province, Reg. 409
 - trust and loan, taxable income earned in a province, Reg. 405
 - when “controlled”, 112(6)(b)
 - wholly-owned subsidiary
 - defined, 248(1)
 - without share capital, whether control acquired, 256(8.1)
 - winding-up of
 - distribution deemed dividend, 84(2), (6)
- Corporation payment**
 - for acting services
 - deferred payment by corporation to actor, 115(2.2)
 - defined, 212(5.2)
- Corporeal property**
 - defined,

- Corporeal property (*cont'd*)
- • *Quebec Civil Code*, art. 906 (energy)
- Corrections officer**
- pension accrual to retire early, *see* Public safety occupation
- Corruption of public officials**
- no deduction for, 67.5
- Cosmetic surgery**
- disallowed as medical expense, 118.2(2.1)
- Cost**, *see also* Adjusted cost base; Capital cost; Rollover
- acquisition, of
 - • capitalized interest, 21
 - • land, 18(2), (3.1)
 - • • included in inventory, 10(1.1)
 - • non-arm's length transaction, 69(1)(a), (c)
 - • property owned Dec. 31/71, ITAR 26(3), (4)
 - • taxpayer becoming resident of Canada, ITAR 26(10)
 - amount, *see* Cost amount
 - borrowed money, of, capitalized interest, 21
 - depreciable property, 13(7.1)
 - emissions allowance, of, 27.1(2)
 - farm or fishing property transferred to child
 - • *inter vivos*, 73(3.1)(e)
 - • on death, 70(9.01)(b)(ii)
 - gift, of, 69(1)(c)
 - property after immigrating to Canada, 128.1(1)(c)
 - property received from partnership, 98(3), (5)
 - property seized for non-payment of debt, 79.1(6)
 - property whose value included in income, 52
 - share of corporation that becomes resident in Canada, 52(8)
 - tax shelter investment, 143.2(6)
- Cost amount**, *see also* Adjusted cost base
- defined
 - • for capital interest in a trust, 108(1)
 - • generally, 248(1)
 - • stock dividend, 52(3)
- Cost base of property**, *see also* Adjusted cost base
- additions to, 53(1)
 - adjustments to, 53
 - deductions from, 53(2)
 - "relevant" to foreign affiliate, 95(4)
- Cost of capital**
- defined, 125.2(1), Reg. 5202, 5203(1), 5204
- Cost of labour**
- defined, 125.2(1), Reg. 5202, 5203(1), 5204
- Cost of manufacturing and processing capital**
- defined, Reg. 5202, 5204
- Cost of manufacturing and processing labour**
- defined, Reg. 5202, 5204
- Cost of the particular property**
- meaning of, for ITC recapture rules, 127(32)
- Costs**, *see* Court: costs; Legal costs
- Costumes**
- capital cost allowance for, Reg. Sch. II:Cl. 12(k)
- Counselling services**
- investment, *see* Investment counselling fees
 - value of, not included in employee's income, 6(1)(a)(iv)
- Counterparty**
- affiliated, 112(2.32)(a)
 - affiliated specified, 112(2.32)(b)(ii)(A)(II)
 - meaning of, for synthetic equity arrangements, 112(2.34), 248(1)"synthetic equity arrangement"(a)(i)
 - specified, 112(2.32)(b)(ii)(A)(I)
- Countervailing duties**, *see* Anti-dumping duties or countervailing duties
- Countries**, *see* Prescribed countries
- Country club**, *see* Club
- Country-by-country report**
- defined, 233.8(3)
- Country-by-country reporting**, 233.8
- filing obligation, 233.8(3)
 - penalty for non-compliance, 162(7)(a)
- Country-specific foreign expenses**
- defined, for resource expenses of limited partner, 66.8(1)(a)(i)(D)
- Coupons**
- cashed for non-resident, tax and statement required, 215(2), 234
 - identification of, 240(2)
 - ownership certificate required, 234
 - stripped bond, *see* Stripped bond
- Court**, *see also* Judge
- appeal to, *see* Appeal; Tax Court of Canada
 - compliance orders
 - • after conviction of an offence, 238(2)
 - • re audit or demand for information, 231.7
 - costs
 - • awarded against taxpayer, treated as debt owing, 222.1
- Covenant**
- amount receivable for, on sale of property, 42
 - ecologically sensitive land, value when donated, 110.1(5), 118.1(12)
 - • valuation applies for capital gains purposes, 43(2)
- Coverage**
- under life insurance policy, defined, Reg. 310, 1401(3)
- Covid-19**, *see* COVID-19 (at beginning of 'C' entries)
- Craig case overruled**, 31(1)
- "Created by the taxpayer's will"**
- meaning of, 248(9.1)
- Credit**, *see* Tax credits
- Credit rating agency**
- prescribed, Reg. 4900(2)
- Credit-related gains and losses, effect on securities held**, 142.4(7)B
- Credit union**, *see also* Financial institution
- "allocation in proportion to borrowing" defined, 137(6)
 - allocation of taxable dividends and capital gains, 137(5.1), (5.2)
 - amalgamation of, in Quebec, 87(2.3)
 - "bonus interest payment" defined, 137(6)
 - deemed not to be private corporation, 137(7)
 - defined, 137(6), 248(1)
 - deposit insurance corporation deemed not to be, 137.1(7)
 - disposition of Canadian security, 39(5)(b)
 - federal, *see* Federal credit union
 - general provisions, 137
 - member, defined, 137(6)
 - member's income, 137(5)
 - paid-up capital of, 89(1)"paid-up capital"(b)
 - Requirement for Information, electronic delivery of, 231.2(1.1)
 - reserves
 - • maximum cumulative, defined, 137(6)
 - share of, meaning, 248(1)"share"
 - small business deduction, 137(3), (4)
 - transitional, ITAR 58
- Credit union central**
- defined, for international electronic funds transfer reporting, 244.1
- Creditable United States tax**
- defined, 122.7(1)
- Creditor**, *see also* Loan
- acceleration clause exercised by, 20(1)(n)
 - defined, 79(1), 79.1(1), 80.01(3)
 - property acquired on foreclosure by, 79

- Creditor (*cont'd*)
- seizure of property by, 79.1
 - surrender of property to, 79
- Creditor affiliate**
- defined
 - for foreign currency rules, 39(2.1)
 - application to FAPI, 95(2)(g.04)
 - for upstream loan rules, 90(6)
- Creditor partnership**
- defined, for upstream loan rules, 90(6)
 - application to FAPI, 95(2)(g.04)
- Credits**, *see* Tax credits
- Cremation services**, *see* Eligible funeral arrangement; Funeral services
- Crew**
- defined, Reg. 105.1(1)
- Crib death monitor, medical expense**, Reg. 5700(r)
- Criminal Injuries Compensation Board**
- payments exempt, 81(1)(q), Reg. 6501
- Criminal offences**, *see* Offences
- Criminal proceedings**
- secrecy provision not applicable, 241(3)
- Critical Mineral Exploration Tax Credit**, 127(9)“flow-through mining expenditure” (Proposed Amendment)
- Croatia**, *see also* Foreign government
- universities, gifts to, Reg. Sch. VIII, s. 18
- Crop insurance program**, *see* Farm Income Protection Act; Drought or flood region
- Cross-border amalgamation**, 128.2
- Cross-border class**
- defined, for foreign affiliate dumping rules, 212.3(4)
 - anti-avoidance rule, 212.3(6)
- Cross-border purchase butterfly**, 55(1), (3.1), (3.2)
- Cross-border worker**, *see* Commuter to United States
- Crown**, *see also* Government
- corporation, *see* Crown corporation
 - death of, *Interpretation Act* s. 46
 - gifts to
 - by corporation, 110.1(1)(a), 149.1(1)“qualified donee”(d)
 - by individual, 118.1(1)“total charitable gifts”, 149.1(1)“qualified donee”(d)
 - not bound by legislation, *Interpretation Act* s. 17
 - bound by deemed trust for tax withheld, 227(4.3)
 - bound by garnishment orders, 224(1.4)
 - bound by regulations requiring information returns, 221(3)
 - bound by withholding tax requirements, 227(11)
 - royalty, *see* Crown royalty
- Crown charge rebate**
- included in income, 12(1)(x.2)
- Crown corporation**
- bonds of, no non-resident tax on interest paid, 212(1)(b)(ii)(C)(IV)
 - corporation controlled by, not private corporation, 89(1)“private corporation”
 - debt held by federal government, excluded from capital tax, 181(1)“long-term debt”
 - debt of, as qualified investment for RRSPs etc., Reg. 4900(1)(q)
 - deemed not private corporation for Part IV tax, 227(16)
 - exemption for, 149(1)(d)–(d.4)
 - election to remain taxable, 149(1.11)
 - excluded where prescribed, 27(2)
 - federal, prescribed, Reg. 7100
 - prescribed, deemed not private corporation, 27(2)
 - reporting of contract payments, Reg. 237
 - subject to Part I tax, 27(2), 124(3)
 - subject to Part I.3 tax, 181.71
 - subject to Part IV.1 tax, 187.61
 - subject to Part VI tax, 190.211
 - subject to Part VI.1 tax, 191.4(3)
 - transfer of unused resource expenses, 66.6
- Crown foundation**
- donation to, 149.1(1)“qualified donee”(d)
 - by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
- Crown royalty**
- refund or rebate of, income inclusion, 12(1)(x.2)
- Cruise terminal relief (COVID)**, Reg. 8901.1(2)(b)(xvi), *see also* Qualifying tourism or hospitality entity
- Crutches**
- as medical expense, 118.2(2)(i)
- Culpable conduct**
- defined
 - for tax-debt avoidance penalty, 160.01(1), 163.2(1)
 - for third-party penalty, 163.2(1)
- Cultural events relief (COVID)**, Reg. 8901.1(2)(b)(iv), *see also* Qualifying tourism or hospitality entity
- Cultural program for children**, *see* Children’s Arts Tax Credit (pre-2017)
- Cultural property**, *see also* Art; Canadian Cultural Property Export Review Board
- Canadian art, CCA claims allowed, Reg. 1102(1)(e)
 - disposition of, 39(1)(a)(i.1)
 - by institution or public authority, tax on, 207.3
 - excluded from capital gains rules, 39(1)(a)(i.1)
 - fair market value, determination of, 118.1(10), (11)
 - gift of
 - by corporation, 110.1(1)(c)
 - by individual, 118.1(1), (7.1)
- Culvert**
- capital cost allowance for, Reg. Sch. II:Cl. 1(c)
- Cumulative Canadian development expense**, *see also* Canadian development expense
- deduction for, 66.2(2)
 - reduction of, on debt forgiveness, 80(8)(c)
 - short taxation year, 66(13.1)
- Cumulative Canadian exploration expense**, *see also* Canadian exploration expense
- deduction for, 66.1(2), (3)
 - defined, 66.1(6)
 - reduction of, on debt forgiveness, 80(8)(b)
 - trust, of
 - reduced by investment tax credit, 127(12.3)
- Cumulative Canadian oil and gas property expense**, *see also* Canadian oil and gas property expense
- deduction for, 66.4(2)
 - defined, 66.4(5)
 - reduction of, on debt forgiveness, 80(8)(d)
 - short taxation year, 66(13.1)
- Cumulative eligible capital (pre-2017)**, 14 [repealed]; *see now* Goodwill
- Cumulative excess amount**
- ALDA (advanced life deferred annuity)
 - defined, 205(1)
 - tax on, 205(2)
 - RRSP contributions, 62
 - defined, 204.2(1.1)
 - tax on, 204.1(2.1)
- Cumulative foreign resource expense**
- defined, 66.21(1)
- “Cumulative gains limit” defined**, 110.6(1)
- computation, on amalgamation, 87(2)(pp)

Cumulative net investment loss

- defined, 110.6(1)
- reduced by taxable capital gains where exemption not available, 110.6(1)“investment income”(f)
- reduces capital gains exemption available, 110.6(1)“cumulative gains limit”, 110.6(2)(b), 110.6(2.1)(b)

Cumulative offset account

- computation, on amalgamation, 87(2)(pp)

Cumulative reserve

- maximum, of credit union, 137(6)

Cumulative unused excess capacity

- defined, for interest deduction restrictions, 18.2(1), 248(1)
- • after change in control (loss restriction event), 111(5.01)
- transfer of to related corporation, 18.2(4)

Curator, see also Legal representative

- deemed to be legal representative, 248(1)“legal representative”
- obligations of, 159
- return required by, 150(3)

Currency, see also Foreign exchange

- blocked
- • income in, postponement of tax, 161(6)
- calculation of foreign affiliate’s gain or loss in, 95(2)(f)
- fluctuation, *see* Foreign exchange: fluctuations in

Current amount (on disposition of specified debt obligation), see also Residual portion (on disposition of specified debt obligation)

- application of, 142.4(4)
- defined, 142.4(7)

Current nature

- expenses required to be for SR&ED deduction, 37(1)(a)
- meaning of, 37(8)(d), 37(14)
- • amounts that are not current expenses of recipient, 37(14), (15)

Current reference period

- defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)

Custodial account

- defined, for Common Reporting Standard, 270(1)

Custodial institution

- defined, for Common Reporting Standard, 270(1)

Custodian

- of employee benefit plan
- • defined, 248(1)“employee benefit plan”
- of eligible funeral arrangement
- • defined, 148.1(1)
- • repayment of funds by, taxable, 148.1(3), 212(1)(v)
- of property where solicitor-client privilege claimed
- defined, 232(1)
- of retirement compensation arrangement
- • defined, 248(1)“retirement compensation arrangement”

Custom Processing

- treated as gross revenue from a mine, Reg. 1104(5.1)

Customs Act

- communication of information for enforcement of, 241(4)(d)(ii)

Customs and Revenue Agency, see Canada Revenue Agency**Cutlery**

- capital cost allowance for, Reg. 1100(1)(e), Reg. Sch. II:Cl. 12(b)

Cutting rights

- capital cost allowance, separate classes, Reg. 1101(3)

Czech Republic, see also Foreign government

- stock exchange recognized, 262
- universities, gifts to, Reg. Sch. VIII, s. 16

D**DC, see Distributing corporation****DFA, see Derivative forward agreement****DIC, see Deposit insurance corporation****DIEP, see Designated immediate expensing property****DLAD, see Designated liquidation and dissolution****DPSP, see Deferred profit sharing plan****DRA, see Dividend rental arrangement****DRA share**

- defined, 248(1)

DRD, see Dividend received deduction**DRIP, see Dividend reinvestment plan****DSLPP (Deferred salary leave plan), see Sabbatical arrangement****DTC, see Disability tax credit; Dividend tax credit****DVD, see Digital video disk (DVD)****Daily compounding of interest, 248(11)****Dairy, farming, 248(1)“farming”****Dam**

- capital cost allowance, Reg. Sch. II:Cl. 1(d)
- • for mine, Reg. Sch. II:Cl. 10(l)

Damages

- taxation of, 9(1); IT-365R2
- wrongful dismissal, for, *see* Retiring allowance

Damis Properties case overruled, 160(5)(a)**Dancer**

- deduction from employment income, 8(1)(q)

Data cable

- capital cost allowance, Reg. Sch. II:Cl. 42(b)

Data communication equipment

- capital cost allowance, Reg. Sch. II:Cl. 3

Data network infrastructure equipment

- capital cost allowance, Reg. Sch. II:Cl. 46
- defined, Reg. 1104(2)

Data processing equipment, see Computer**Dates, see Deadlines; Filing deadlines; Reassessment****Daughter-in-law, as child of taxpayer, 252(1)(c)****Day camp, see Child care expenses****Day care, see Child care expenses****Day of mailing**

- constitutes date assessment or determination made, 244(15)
- presumed to be same as date appearing on notice, 244(14)

Days

- calculation of, *Interpretation Act* s. 27

De facto control test

- “controlled, directly or indirectly in any manner whatever”, 256(5.1)

Deadline

- defined, for insurance demutualization, 139.1(1)

Deadlines

- extension of, by CRA, 220(3.2)
- • labour-sponsored venture capital corporation investments, 127.4(5.1)
- • RRSP contributions, 146(22)
- payment of tax, *see* Payment of tax
- prosecution, *see* Limitation periods
- reassessments, *see* Reassessment
- returns, *see* Filing deadlines
- tax remittances, *see* Remittance of taxes withheld
- transfer pricing, *see* Documentation — due date

Deaf person, see also Hearing impairment

- deaf-blind intervening services
- • disability supports deduction, 64(a)A(ii)(M)
- • medical expense credit, 118.2(2)(1.44)
- devices to assist, business expense, 20(1)(rr)
- disability credit, 118.3
- guide dog, expenses, 118.2(2)(l)
- lip reading or sign language training, 118.2(2)(l.3)

- Deaf person (*cont'd*)
- medical expenses, 118.2(2), Reg. 5700
 - real-time captioning services, *see* Captioning services
 - rehabilitative therapy, 118.2(2)(1.3)
 - sign language interpretation services, *see* Sign language
- Dealer compensation payment**
- defined, for securities lending arrangement, 260(1)
- Dealer (or trader)**
- automobile, standby charge for sales employees, 6(2.1)
 - in resource rights, 66(5)
 - in securities, *see* Securities: dealer, trader or agent
- Death**, *see also* Death of taxpayer
- danger of, communication of taxpayer information relating to, 241(3.1)
 - funeral arrangements, *see* Eligible funeral arrangement; Funeral services
 - Queen, of, *Interpretation Act* s. 46
- Death benefit**
- Canada Pension Plan, *see* Canada Pension Plan/Quebec Pension Plan: death benefit
 - defined, 248(1)
 - emigration of survivor, no deemed disposition, 128.1(10)“excluded right or interest”(h)
 - flowed through trust or estate, 104(28)
 - from ALDA (advanced life deferred annuity), taxable, 146.5(3)
 - income, 56(1)(a)(iii)
 - lump sum
 - transfer from RPP, 147.3(7)
 - withholding of tax, 153(1)(d)
- Death duties**
- interest on, deductible, 60(d)
- Death of taxpayer**
- amounts receivable, 70(2)
 - business income, effect on, 34.1(8)(a)
 - business year-end income inclusion, 34.1(9)
 - business year-end not calendar year, 34.1(8), (9)
 - capital losses deductible against all income, 111(2)
 - charitable donations carryback
 - carryback, 118.1(4)
 - claim against 100% of net income, 118.1(1)“total gifts”(a)(ii)
 - donation of non-qualifying security, 118.1(15)
 - donations made by will or by estate, 118.1(1)“total charitable gifts”(c), 118.1(5.1)
 - gift of art, 118.1(7)(c)
 - Class 14.1 property (goodwill), 70(5.1)
 - computation of income on, 70(1)
 - consequences of, meaning, 248(8)
 - debt forgiveness rules do not apply to extinguishment of debt by bequest, 80(2)(a)
 - debt obligation settled by estate, 80(2)(p), (q)
 - deemed proceeds of disposition of property, 70(5)–(10)
 - disposition of property on, 70(5)–(10)
 - definitions, 70(10)“child”
 - legal representative, by, 164(6)
 - ordering, 70(14)
 - disposition of right to share in partnership income, 96(1.5)
 - elections, Reg. Part X
 - eligible capital property (now Class 14.1 property), 70(5.1)
 - entitlement to benefits on
 - deemed, spouse, 146(8.91)
 - other than spouse, by, 146(8.8), (8.9)
 - farming business, no inventory adjustment, 28(1) closing words
 - forward averaging, 110.4(4) [repealed]
 - funeral services provided from eligible funeral arrangement, no tax, 148.1(2)(b)(i)
 - gifts, time of, 118.1(4)
 - goodwill, 70(5.1)
 - Home Buyers’ Plan income inclusion or rollover, 146.01(6), (7)
 - instalments not required after, 156.1(3)
 - investment tax credit, income inclusion re, 70(1)(b)
 - land inventories, 70(5.2)
 - last annuitant under registered retirement income fund, 146.3(6)–(6.2)
 - life estate in real property, termination of, 43.1(2)
 - Lifelong Learning Plan income inclusion or rollover, 146.02(6), (7)
 - minimum tax not applicable, 127.55
 - net capital loss, 111(2)
 - notification to CRA by spouse required for Canada Child Benefit purposes, 122.62(5)(a)
 - occurrences as a consequence of, 248(8)
 - partner return, 150(4)
 - partnership
 - value of rights or things, 53(1)(e)(v)
 - partnership interest, transfer of, 100(3)
 - payment by employer, *see* Death benefit
 - payment of tax
 - election to pay in instalments, 159(5)
 - property passing to spouse or trust, 70(6)
 - proprietor, return needed, 150(4)
 - RPP contributions deductible, 147.2(6)
 - RRIF
 - income inclusion to deceased, 146.3(6), (6.2)
 - losses after death, carryback to deceased’s last year, 146.3(6.3), (6.4)
 - tax-paid amounts, *see* Tax-paid amount
 - RRSP
 - distribution to child or grandchild, 60(1)(v)(B.01), (B.1), 146(1)“refund of premiums”(b)
 - income inclusion to deceased, 146(8.8), (8.9)
 - losses after death, carryback to deceased’s last year, 146(8.92), (8.93)
 - tax-paid amounts, *see* Tax-paid amount
 - reserves not deductible, 72(1)
 - resource properties, 70(5.2)
 - return required, 150(1)(b), (e)
 - where none filed, 150(1)(e)
 - rights or things, 70(2)
 - transferred to beneficiaries, 70(3)
 - separate return, 70(2)
 - minimum tax carryover not applicable to, 120.2(4)
 - single payment from deferred profit sharing plan, 147(10.1), (10.2)
 - spouse or spouse trust, property transferred to, 70(6)
 - stock options, effect on, 7(1)(e)
 - TFSA, 146.2(9), 207.01(1)“exempt contribution”, 207.01(3)
 - tax on, 70(1), (5)
 - termination of life estate, 43.1(2)
 - transfer of partnership interest, 98.2
- Debenture**, *see* Bond; Convertible property
- Debt**, *see also* Commercial obligation; Debt obligation; Indebtedness
- amalgamation, on, 87(2)(h)
 - assets acquired from foreign affiliate for settlement of, 80.1(5)
 - assumption of, debt forgiveness rules do not apply, 80(1)“forgiven amount”B(l)
 - bad, *see* Bad debt
 - corporation, of,
 - qualified investment for RRSP etc., 204“qualified investment”(c.1), Reg. 4900(1)(i)
 - deficiency, 84.2(2), (3)
 - defined, re seizure of property by creditor, 79(1), 79.1(1)
 - disposition of, *see* Debt obligation: disposition of
 - doubtful, reserve for, 12(1)(d), 20(1)(l)
 - foreign currency, denominated in, 79(7), 80(2)(k), 80.01(11)
 - forgiveness, *see* Debt forgiveness

- Debt (*cont'd*)
- long-term
 - defined, 190(1)
 - non-qualifying
 - owing to registered charity, 189
 - trust for benefit of spouse, 70(8)(b)
 - owed by corporation, adjusted cost base, 53(2)(p)
 - owing by non-resident to corporation resident in Canada, 17
 - parking, *see* Debt parking
 - rescheduling or restructuring, expenses deductible, 20(1)(e)(ii.2), 20(1)(e.1)(iii)
 - security received in satisfaction of, 76
 - seizure of property for payment of
 - effect on creditor, 79.1
 - effect on debtor, 79
 - settlement of, *see* Debt forgiveness
 - share issued in settlement of, 80(2)(g), (g.1)
 - statute-barred, deemed settled, 80.01(9)
 - subsequent payments, 80.01(10)
 - testamentary
 - trust for benefit of spouse, 70(8)(c)
 - unpaid tax, etc., as, 222(2)
- Debt forgiveness**, 80–80.04, *see also* Settlement of debt
- amalgamation, on, 80.01(3)
 - application of remaining balance
 - adjusted cost base of capital property, 53(2)(g.1), 80(9)–(11)
 - allowable business investment loss carryforwards, 80(4)(a)
 - capital cost of depreciable property, 13(7.1)(g), 80(5)
 - capital gain to absorb current capital losses, 80(12)
 - capital property, 53(2)(g.1), 80(9)–(11)
 - cumulative Canadian development expense, 66.2(5)“cumulative Canadian development expense”M.1, 80(8)(c)
 - cumulative Canadian exploration expense, 66.1(6)“cumulative Canadian exploration expense”J.1, 80(8)(b)
 - cumulative Canadian oil and gas property expense, 66.4(5)“cumulative Canadian oil and gas property expense”I.1, 80(8)(d)
 - farm losses, 80(3)(b)
 - foreign exploration and development expenses, 66(4)(a)(iii), 80(8)(e)
 - income inclusion, 80(13), (14)
 - net capital losses, 80(4)(b)
 - non-capital losses, 80(3)(a), 80(4)(a)
 - ordering of rules, 80(2)(c), 248(27)
 - related corporations’ shares and debt, 53(2)(g.1), 80(11)
 - resource expenditures, 80(8)
 - restricted farm losses, 31(1.1)(b), 80(3)(c)
 - successor pools, 66.7(2)(a)(ii), 66.7(3)(a)(ii), 66.7(4)(a)(iv), 66.7(5)(a)(iii), 80(8)(a)
 - undepreciated capital cost pool, 80(5)(b), 80(6)
 - bequest or inheritance, rules do not apply, 80(2)(a)
 - corporation to shareholder, taxable benefit, 15(1.2)
 - death, rules do not apply, 80(2)(a)
 - debt issued in settlement of debt, 80(2)(h)
 - debt of deceased settled by estate, 80(2)(p), (q)
 - employer to employee, taxable benefit, 6(15)
 - foreign affiliate’s gain or loss on, 95(2)(i)
 - foreign currency debt, 80(2)(k), 80.01(11)
 - forgiven amount, *see* Forgiven amount (re settlement of debt)
 - guarantee, payment under, 80(2)(l)
 - history preservation rules, 47(1), 49(3.01), 51(1), 53(4)–(6), 86(4), 87(5.1), (6.1)
 - reduction of adjusted cost base, 53(2)(g.1)
 - income inclusion, 12(1)(z.3), 80(13), (14)
 - corporation in financial difficulty, 61.3
 - interest deemed to be separate obligation, 80(2)(b)
 - partnership, by, 80(15)
 - R&D expenditures, effect on, 37(1)(f.1)
 - reserve, 61.2–61.4
 - residual balance
 - defined, 80(14)
 - income inclusion, 80(13)
 - settlement, meaning of, *see* Settlement of debt
 - share issued in settlement of debt, 80(2)(g), (g.1)
 - simultaneous settlement of obligations, 80(2)(i)
 - subsequent disposition, capital gain, 80.03(2)
 - surrender of property
 - by debtor to creditor, 79(3), 79.1
 - subsequent to debt forgiveness, 80.03(2)
 - transfer of forgiven amount to related person, 80.04
 - winding-up, 80.01(4)
 - **Debt obligation**, *see also* Commercial obligation; Investment contract; Specified debt obligation
 - accrued interest on, 12(3)–(10)
 - adjusted cost base, 53(2)(l)
 - amalgamation, acquired in, 87(2)(e.2)
 - assumption of, expenses deductible, 20(1)(e)(ii.2), 20(1)(e.1)(iii)
 - deduction for over-accrual, 20(21)
 - defined, *see also* Commercial debt obligation; Indexed debt obligation; Specified debt obligation
 - re prepayments, 18(9.1), (9.2)
 - re qualified investments, 204
 - discounted, *see* Bond: discount
 - disposition of
 - in exchange for other debt obligation, 40(2)(e.2)
 - addition to adjusted cost base, 53(1)(f.12)
 - to related person, 40(2)(e.1)
 - addition to adjusted cost base, 53(1)(f.1), (f.11)
 - whether capital loss allowed, 40(2)(g)(ii)
 - escalating interest, accrual, Reg. 7000(2)(c.1)
 - extended meaning of, 248(26)
 - for penalties, bonuses and rate reduction payments, 18(9.1)
 - for prepaid interest rules, 18(9.2)
 - for purposes of scientific research tax credit, 127.3(2)“scientific research and experimental development tax credit”(d)
 - generally, not defined
 - first registered holder of
 - election re scientific research tax credit, 127.3(9)
 - increasing interest rate, accrual, Reg. 7000(2)(c.1)
 - interest on, 20(14.1)
 - issued by partnership, 80(13)E(a), 80(14)(b), 80(15), (18)
 - deemed, 80(2)(n)
 - owing by related person, no loss permitted on disposition, 40(2)(e.1)
 - partial obligation treated the same as entire obligation, 248(27)
 - prescribed
 - accrued interest on, Reg. 7000
 - deemed accrual of interest, 12(9)
 - exception, 12(9.1)
 - re donations to charities, 38(a.1)(i), Reg. 6210
 - qualifying, *see* Qualifying debt obligation
 - settlement of, *see* Debt forgiveness
 - specified, *see* Specified debt obligation
 - used or held in insurance or moneylending business
 - “eligible property” for transfer to corporation by shareholder, 85(1.1)(g)
 - **Debt parking**, 80.01(6)–(8)
 - deemed settlement of debt, 80.01(8)
 - subsequent payment of debt, 80.01(10)
 - to avoid foreign exchange gain, 39(2.01)–(2.03)
 - application when functional currency election made, 261(10.1)
 - application when functional currency election revoked, 261(14.1)

Debt substitute share

- defined, Canada-U.S. Tax Treaty:Art. XXIX-A:5(a)

Debtor

- defined, 80(1), 80.01(1), 80.04(1)
- gain on settlement of debts, 80(1), Reg. Part LIV

Deceased person. *see* Death of taxpayer

Decline in value of property

- inventory writedown, 10(1), (1.01)
- rules preventing transfer of losses, 13(21.2), 40(3.3), (3.4)

Decoder

- television, visually displaying vocal portion of signal
- • medical expense, Reg. 5700(q)

Deductible

- defined, for hybrid mismatch arrangement rules, 18.4(1)

Deduction

- or set-off, recovery of taxes by, 224.1

Deduction component

- defined, for hybrid mismatch arrangement rules, 18.4(7)(a), 18.4(11)(b), 18.4(13)(b), 18.4(15)(b)

Deduction/non-inclusion mismatch

- defined, for hybrid mismatch arrangement rules, 18.4(6), 18.4(7)(c)
- effect of, 18.4(7)

Deductions in computing income. *see also* Deductions in computing income from business or property; Deductions in computing income from office or employment; Deductions in computing taxable income

- alimony payments, 60(b)
- amounts transferred as retiring allowance, 60(j.1)
- Canadian exploration expenses, 66.1(2), (3)
- capital element of annuity, 60(a)
- “carved-out income”, 66(14.6)
- child care expenses, 63
- cost of borrowed money, 21
- costs re construction of building or ownership of land, 18(3.1)–(3.7)
- cumulative Canadian development expenses, 66.2(2)
- • short taxation year, 66(13.1)
- cumulative Canadian oil and gas property expense, 66.4(2)
- • short taxation year, 66(13.1)
- cumulative offset account, 66.5
- deemed residents, 64.1
- deposit insurance corporation, 137.1(3)
- • limitation, 137.1(4)
- disability supports deduction, 64
- dividend from foreign affiliate, 20(13), 113(1)
- employee benefit plan, 32.1
- employer’s contributions
 - • deferred profit sharing plan, 147(8), (9)
 - • employees profit sharing plan, 144(5)
 - • registered supplementary unemployment benefit plan, 145
- foreign exploration and development expenses, 66(4)
- • short taxation year, 66(13.1)
- foreign taxes, re, 91(4)
- insurance corporation
 - • amounts paid or credited to policyholders, 140(1)
 - • interest on death duties, 60(d)
- legal expenses of collecting or establishing right to pension benefit etc., 60(o.1)
- maintenance payments, 60(b), (c), 60.1
- mental/physical impairment
 - • attendant care expenses, 64(a)(ii)(J)
- mortgage on depreciable property, loss from sale of, 20(5), (5.1)
- moving expenses, 62
- Part I.2 tax payable, 60(w)
- patronage dividend, 135(1)
- • carryover of, 135(2.1)

- provincial pension plan contributions, 146(21.1)
- RRSP, premiums under, 60(i)
- refund of income payments, 60(q)
- refund of RRSP premium transferred to annuity, 60(l)
- refund of undeducted past service additional voluntary contributions, 60.2(1)
- repayment of overpayment of certain benefits, 60(n)
- repayment of policy loan, 60(s)
- residents absent from Canada, 64.1
- resource and processing allowances, Reg. Part XII
- resource expenses
 - • successor corporation, 66.7
- retirement compensation arrangement
 - • benefit from, 60(t)
 - • contributions to, 20(1)(r)
 - • disposition of interest in, 60(u)
- scientific research and experimental development, 37
- succession duties applicable to certain property, 60(m.1)
- superannuation benefits transferred to another plan, 60(j)
- support payments, 60(b), (c), 60.1
- trusts of, 104(6)–(8)
- uncollectible proceeds of disposition, 20(4)–(4.2)

Deductions in computing income from business or property, *see also* Deductions in computing income

- accrued interest on transferred bond, 20(14)
- amount deemed to be tax payable, 20(1)(l)
- bad debts, 20(1)(p)
- CPP/QPP contributions, 8(1)(l.1), 60(e)
- cancellation of lease, 20(1)(z), (z.1)
- capital cost allowance, *see* Capital cost allowance
- depletion, *see* Depletion allowances
- discount on certain obligations, 20(1)(f)
- dividend from foreign affiliate, 20(13), 113(1)
- employer’s contributions
 - • deferred profit sharing plan, 20(1)(y), 147(8), (9)
 - • pension plan, 20(1)(q), 147.2(1)
 - • • limitation, 20(22)
 - • • special, 20(1)(r)
- profit sharing plan, 20(1)(w)
- • supplementary unemployment benefit plan, 20(1)(x)
- expense of issuing shares or borrowing money, 20(1)(e)
- exploration and development grants, 20(1)(kk)
- foreign taxes
 - • exceeding 15%, 20(11)
 - • guarantee fees etc., 20(1)(e.1)
- injection substances, 20(1)(ll)
- interest
 - • accrued on purchased bond, 20(14)
 - • compound, 20(1)(d)
 - • paid on borrowed money, 20(1)(c)
- inventory adjustment, 20(1)(ii)
- investigation of site, 20(1)(dd)
- investment counsel fee, 20(1)(bb)
- landscaping, 20(1)(aa)
- life insurance corporation, 138(3)
- limitations on, 18(1), (11)
- mineral resources, 65
- mining taxes, 20(1)(v)
- oil or gas wells, 65
- patronage dividend, 20(1)(u)
- permitted, 20(1)
- prepaid expenses
 - • limitation re, 18(9)
- repayment of amount previously included, 20(1)(m.2)
- repayment of inducement, 20(1)(hh)
- repayment of shareholder’s loan, 20(1)(j)
- representation expenses, 20(1)(cc)
- reserves, *see* Reserve

Deductions in computing income from business or property (*cont'd*)

- salary deferral arrangements, 20(1)(oo)
- scientific research and experimental development, 37
- share transfer fees, 20(1)(g)
- terminal loss, 20(16)
- utilities service connection, 20(1)(ee)
- western grain stabilization levy, 20(1)(ff)

Deductions in computing income from office or employment, *see also* Deductions in computing income; Employee; Expenses

- aircraft costs, Reg. 1100(6)
- • reasonability, 8(9)
- allowed, 8(1)
- artists' expenses, 8(1)(q)
- automobile expenses, 8(1)(h.1)
- clergyman's residence, 8(1)(c)
- limitations
 - • general, 8(2)
 - • meals, 8(4)
- registered pension plan contributions, 8(1)(m), 147.2(4)
- retirement compensation arrangement, 8(1)(m.2)
- teachers' exchange fund, 8(1)(d)

Deductions in computing tax, *see also* Tax credits

- corporations
 - • abatement, 124
 - • income earned in province, 124(1)
 - • manufacturing and processing profits, 125.1
 - • small business deduction, 125
- foreign tax, 126
- gifts, 118.1(3)
- income earned in province that provides schooling allowance, 120(2)
- *Income War Tax Act*, under, ITAR 17(1)
- international organization, levy by, 126(3)
- investment corporation, 130(1)
- investment tax credit, 127(5)–(36)
- logging tax, 127(1)
- manufacturing and processing profits, 125.1
- mortgage investment corporations, 130.1
- personal credits, 118–118.95
- political contributions, 127(3)–(4.2)
- S.C. 1947, c. 63, s. 16, under, ITAR 17(3)
- small business deduction, 125
- taxable dividends, 121

Deductions in computing taxable income, *see also* Tax credits; Deductions in computing income

- amounts exempt under tax agreements, 110(1)(f)(i)
- annual adjustment, 117.1
- capital gains, 110.6
- corporations
 - • gifts, 110.1
- dividend
 - • from foreign affiliate, 113
 - • received by corporation, 112
- employee stock options, 110(1)(d), (d.1)
- *Income War Tax Act*, under, ITAR 17(2)
- indexing, 117.1
- losses of other years, 111
- medical expenses, *see* Medical expenses
- member of religious order, 110(2)
- net capital losses, 111(1)(b), 111(1.1), (2)
- non-capital losses, 111(1)(a)
- order of applying provisions, 111.1
- other, permitted, 110
- Part VI.1 tax, 110(1)(k)
- part-year resident, 114
- separate returns, 114.2

- social assistance payments, 110(1)(f)(iii)
- unemployment insurance benefit repayment, 110(1)(i)
- workers' compensation payments, 110(1)(f)(ii)

Deemed disposition, *see* Disposition: deemed

Deemed dividend, *see* Dividend: deemed

Deemed overpayment, *see* Overpayment of tax: deemed

Deemed realization of gains, *see* Disposition: deemed

Deemed year-end, *see* Year-end: deemed

Deer, 80.3(1)“breeding animals”

Defaulting taxpayer, 226

Defence forces, *see* Canadian Forces and veterans

Deferral, *see also* Rollover

- amount, *see* Deferral amount
- anti-avoidance rules, *see* Anti-avoidance rules: deferral of tax
- departure tax, by posting security, 220(4.5)–(4.54)
- expenses payable but not paid, 78
- partnership income
 - • corporate partner, 34.2
 - • individual partner, 34.1
- stock option benefit, 7(1.1), (1.8), (8)–(16)
- tax on distribution by trust to non-resident beneficiary, by posting security, 220(4.6)–(4.63)

Deferred amount, defined, 248(1)

Deferred annuity out of pension plan, 254

Deferred income

- salary deferral arrangements, 6(1)(i), 6(11)–(14)

Deferred income plans, 144–147.3, *see also* Deferred profit sharing plan; Registered education savings plan; Registered pension plan; Registered retirement income fund; Registered retirement savings plan; Registered supplementary unemployment benefit plan

- interest on money borrowed to invest in, not deductible, 18(11)
- over-contributions to
 - • tax on, 204.1–204.3
- property held by trust governed by
 - • tax re, 207.1, 207.2
- qualified investments, Reg. Part XLIX
- small business investments, Reg. Part LI
- tax on non-qualified investments, 207.1

Deferred payment

- defined (re top-up disability payments), 8(1)(n.1)(i)

Deferred profit sharing plan

- age 71 maturity, 147(2)(k), 147(10.6)
- amount received from, income, 56(1)(i)
- amount taxable, 147(18), 201
- anti-avoidance rule, 147(18), (22)
- annuity purchased by, *see* purchase of annuity by (*below*)
- conditions, 147(2)
- continuation of, in amalgamation, 87(2)(q)
- defined, 147(1), 248(1)
- definitions, 147(1), 204
- disposal of shares
 - • deduction re amount, 110(1)(d.3)
- disposition of property to, capital loss nil, 40(2)(g)(iv)(A)
- distribution deemed disposition, 200
- emigration of employee, no deemed disposition, 128.1(10)“excluded right or interest”(a)(iv)
- employee contributions prohibited, 147(2)(a.1), 147(14)(c.2)
- employer's contribution
 - • deductible, 20(1)(y), 147(8), (9)
 - • • limitations, 18(1)(j), 147(5.1), 147(9)
 - • not includable in employee's income, 6(1)(a)(i)
 - • terms limiting, 147(2.1)
 - • where not deductible, 147(9.1)
- estate receiving benefits from, 104(27.1)
- “excess amount” defined, 204.2(4)
- excluded from various trust rules, 108(1)“trust”(a)

Index

- Deferred profit sharing plan (*cont'd*)
 - forfeited amounts, 147(2)(i.1), 147(10.3)
 - defined, 147(1)
 - reallocation of, 147(2.2)
 - forfeitures, tax on, 201
 - initial non-qualified investment, defined, 204
 - insurance corporation demutualization conversion benefit, 139.1(12), (14)
 - interest on money borrowed to invest in, whether deductible, 18(11)(c)
 - life insurance policies, 198(6)–(8)
 - lump-sum payment
 - remuneration, Reg. 100(1)
 - maturity by age 71, 147(2)(k), 147(10.6)
 - money borrowed for contribution to
 - limitation on deductibility, 18(11)(c)
 - non-deductible employer contributions prohibited, 147(2)(a.1), 147(14)(c.2)
 - non-qualified investments of, defined, 204
 - not employees profit sharing plan, 147(6)
 - overcontribution to, 204.1(3)
 - participating employer, meaning of, 147(1.1)
 - payment out of profits, meaning of, 147(16)
 - payment under
 - non-resident, to, 212(1)(m)
 - taxable, 147(10)
 - withholding of tax, 153(1)(h)
 - property
 - appropriation of, by employer, 147(13)
 - disposition or acquisition of, for inadequate consideration, 147(18)
 - purchase of annuity by, 147(2)(k)(vi)
 - qualified investment, defined, 204“qualified investment”
 - qualified investments, Reg. Part XLIX
 - defined, 204
 - registration of, 147(2)–(5), Reg. 1501
 - revocation, 147(14), (15)
 - reversionary trust rules do not apply, 75(3)(a)
 - revocation of, 147(14), (22)
 - revoked plan
 - defined, 204, Reg. 4901(2)
 - “excess amount” defined, 204.2(4)
 - payments under, subject to withholding of tax, 153(1)(h)
 - rules applicable, 147(15)
 - RRIF may accept transfer from, 146.3(2)(f)(iv.1)
 - shares included in single payment on retirement etc., 147(10.1), (10.2)
 - disposal of, 147(10.4), (10.5)
 - single payment on withdrawal, 147(10.1), (10.2), (10.4)–(12), Reg. 1503
 - surrender of rights
 - on marriage/relationship breakdown, 147(2)(e)(i)
 - to avoid revocation, 147(2)(e)(iii)
 - tax on forfeitures, 201
 - tax on initial non-qualified investments, 199
 - tax on non-qualified investments, 198
 - distribution deemed disposition, 200
 - refund
 - on disposition, 198(4)
 - on recovery of property given as security, 198(5)
 - return required, 202(1)
 - tax on overcontributions to, 204.1
 - tax payable by
 - on acquisition of shares not at fair market value, 207.1(5)
 - on holding certain property, 207.1(2)
 - tax where inadequate consideration on purchase or sale, 201
 - taxation year of, 144(11)
 - transfer to
 - capital loss deemed nil, 40(2)(g)(iv)(A)
 - DPSP, from, 147(19)
 - transfer from
 - ALDA (advanced life deferred annuity), to, 147(19)(d)(v)
 - DPSP, to, 147(19)(d)(iii)
 - excess, 147(22)
 - registered pension plan, to, 147(19)(d)(iii)
 - registered retirement income fund, 147(19)(d)(iv)
 - registered retirement savings plan, to, 147(19)(d)(ii)
 - restrictions re, 147(21)
 - spouse/partner’s RRSP, RRIF or RPP on breakdown of relationship, 147(2)(e)(i), 147(19)(b)(ii)
 - taxation of amount transferred, 147(20)
 - trust, through, to RPP or RRSP, 104(27.1)
 - trust under, exempt, 147(7), 149(1)(s)
- **Deferred salary leave plan**, *see* Sabbatical arrangement
- **Deficit affiliate**
 - defined, Reg. 5905(7.1)(a)
- **Defined benefit limit**
 - defined, Reg. 8500(1)
- **Defined benefit provision**
 - defined, 147.1(1)
- **Defined contribution provision**, *see* Money purchase provision
- **Definitions**, *see also* the specific defined terms
 - application of, *Interpretation Act* s. 15
 - capital gains exemption rules, 110.6(1)
 - capital property rules, 54
 - charities, 149.1(1)
 - corporations, 89
 - foreign affiliate rules, 95
 - general, 248
 - insurance rules, 138(12), 148(9), Reg. 1408
 - investment tax credit rules, 127(9)
 - registered pension plans, 147.1(1)
 - registered retirement income funds, 146.3(1)
 - registered retirement savings plans, 146(1)
 - regulations, *Interpretation Act* s. 16
 - relationships, 251–252
 - resource taxation, 66(15), 66.1(6), 66.2(5), 66.4(5)
 - small business rules, 125(7)
 - terms used in regulations, *Interpretation Act* s. 16
 - trusts, 108
- **Delay**
 - undue, in rendering account for services, 12(1)(b)(ii)
- **Delegation of powers and duties of Minister**
 - administrative, 220(2.01)
 - by regulation, 221(1)(f) (repealed), Reg. Part IX (repealed)
- **Deliberate over-contribution (to TFSA)**
 - benefit attributable to, constitutes advantage, 207.01(1)“advantage”(c)(i)
 - defined, 207.01(1)
- **Demand**
 - by Minister
 - actuarial report, for registered pension plan, Reg. 8410
 - books and records, to retain, 230(7)
 - documents, for, 231.2(1)(b)
 - information, for, 231.2(1)(a)
 - electronic delivery to bank or credit union, 231.2(1.1)
 - information return, for, 233
 - return, for, 150(2)
 - proof of failure to comply with, 244(7), (8)
 - proof of service, 244(5), (6)
 - third party, *see* Garnishment for taxes unpaid
 - time contesting, not to count for reassessment clock, 231.8
- **Demutualization**, 139.1
 - defined, 139.1(1)
 - effect of, 139.1(4)

- Demutualization (*cont'd*)
- holding corporation, *see* Holding corporation (insurance demutualization)
 - paid-up capital following, 139.1(6), (7)
 - rollover of ownership rights into shares, 139.1(4)(a), (d)
 - time of, 139.1(2)(i)
- Denmark**, *see also* Foreign government
- stock exchange recognized, 262
- Density**
- hydrocarbons, determination of, Reg. 1107
- Dental bills, as medical expense**, 118.2(2)(a)
- Dental instruments (small)**
- capital cost allowance for, Reg. Sch. II:Cl. 12(e)
- Dental mechanic**
- payments to, as medical expenses, 118.2(2)(p)
- Dental plan**, *see* Private health services plan
- Dentist**, *see also* Professional practice
- defined, 118.4(2)
- Department of Canadian Heritage**, *see* Canadian Heritage, Department of
- Department of Energy, Mines and Resources**
- certificate re Class 34 property, Reg. 1104(11)
 - certificate re mineral deposit, 248(1)“mineral resource”(d)(i)
 - certificate re oil or gas well, 66.1(6)“Canadian exploration expense”(d)(iv), 66.1(10)
 - communication of information to, 241(4)(d)(v)–(vi.1)
 - consultation re mine capacity, Reg. Sch. II:Cl. 1(l), Sch. II:Cl. 28(b)(ii)
 - consultation re pipeline, Reg. Sch. II:Cl. 1(l), Sch. II:Cl. 2(b)
 - determination of prescribed energy conservation property, 13(18.1), 241(4)(d)(vi.1)
- Department of Finance comfort letters**, *see* Table of Comfort Letters
- Department of Fisheries and Oceans Act**, *see* Northern Cod Compensation and Adjustment Program
- Department of Human Resources Development**, *see* Human Resources Development Canada
- Department of Labour Act**
- s. 5, income assistance payments under, *see* Older Worker Adjustment, Program for
- Department of National Revenue**, *see* Canada Revenue Agency
- Department of Social Development Act**
- program under, to compensate parents of child victims of crime, taxable, 56(1)(a.3)
- Departure tax**, *see* Ceasing to be resident in Canada
- Dependant**
- alimony or maintenance paid to, 118(5)
 - child, credit for, 118(1)B(b.1), (d)
 - credit for, 118(1)B(b), (d)
 - apportionment of, 118(4)(e)
 - deemed resident, of
 - also deemed resident, 250(1)(f)
 - defined, 118(6), Reg. 8500(1)
 - infirm, *see* Infirm dependant
 - medical expenses of, 118.2(2)(a)
 - mental or physical impairment, 118.2(2)(b), (c), 118.3(2), 118.4
 - notch provision, 117(7), 118.2(1)D
 - partial
 - mental or physical impairment, 118.3(3)
 - spouse, 118(1)B(a)
 - wholly dependent persons, credit for, 118(1)B(b)
 - limitation, 118(4)
- Dependants' relief acts, trust created by**, 70(6.1)
- Dependent personal services**, *see* Employment: income from
- Depletion allowances**, *see also* Resource allowance
- gas well, 65, Reg. Part XII
 - lessee and lessor, allocation between, 65(3)
 - mineral resource, 65, Reg. Part XII
 - coal mine, allocation, 65(3)
 - mining exploration, Reg. 1203
 - oil well, 65, Reg. Part XII
 - supplementary, Reg. 1212
 - timber limit, 65
- Depletion base**, *see* Earned depletion base; Mining exploration depletion base; Supplementary depletion base
- Deployed operational mission**
- deduction for Canadian Forces or police income while serving on, 110(1)(f)(v)(A)
- Deposit**
- eligible, *see* Eligible deposit
 - insurance corporation, *see* Deposit insurance corporation
 - on container
 - as income, 12(1)(a)(ii)
 - deduction when repaid, 20(1)(m.2)
 - reserve for, 20(1)(m)(iv)
 - specified, *see* Specified deposit
- Deposit accounting insurance policy**
- defined, 138(12), Reg. 1408(1)
- Deposit balance**
- of insurer, defined, Reg. 2400(1)
- Deposit insurance corporation**, *see also* Canada Deposit Insurance Corporation
- amounts included in income, 137.1(1), (10)
 - amounts not included in income, 137.1(2)
 - deductions in computing income, 137.1(3)
 - limitation, 137.1(4)
 - payments to member institutions, 137.1(11)
 - deemed not credit union, 137.1(7)
 - deemed not private corporation, 137.1(6)
 - deeming provision re, 137.1(5.1)
 - defined, 137.1(5)
 - for purposes of dividend gross-up and tax credit, 89(15)
 - investment property, defined, 137.1(5)
 - member institution
 - defined, 137.1(5)
 - payments by, deductible in computing income, 137.1(11)(a)
 - repayment deductible in computing income, 137.1(11)(b)
 - repayment excluded from income of previous year, 137.1(12)
 - security for payment of tax, 220(4.3), (4.4)
 - no high-gross-up dividends, 89(1)“general rate income pool”A:E(b)
 - not subject to mark-to-market rules, 142.2(1)“financial institution”(c)(iv)
 - principal amount of interest payable, 137.1(10.1)
 - property owned since before 1975, 137.2
 - special tax rate, 137.1(9)
 - transfer of premiums from another deposit insurance corporation, 137.1(2)(b)
 - transfer of premiums to another deposit insurance corporation, 137.1(4)(d)
 - wholly-owned subsidiary deemed deposit insurance corporation, 137.1(5.1)
- Depository**
- RRIF, *see* RRIF: depository
 - RRSP, *see* RRSP: depository
 - TFSA, *see* TFSA: depository
- Depository account**
- defined, for Common Reporting Standard, 270(1)
- Depository institution**
- defined, for Common Reporting Standard, 270(1)
- Depository receipt**, *see* American Depository Receipt
- Depreciable property**, *see also* Capital cost allowance
- acquired

Index

- Depreciable property (*cont'd*)
- amalgamation, on, 87(2)(d), (d.1)
 - by transfer, amalgamation or winding-up, Reg. 1102(14), (14.1)
 - capital cost, 13(5.2)
 - non-arm's length, 13(7)(e), Reg. 1102(20)
 - corporations controlled by one trustee, 13(7.3)
 - partner's cost, ITAR 20(4) "acquisition cost"
 - with government assistance, deemed capital cost, 13(7.1), (7.2)
 - additions and alterations, Reg. 1102(19)
 - amortization, *see* Capital cost allowance
 - available for use, 13(26)–(32), 20(28), (29), Reg. 1100(2)
 - borrowing money for, 21(3)
 - capital, disposed of
 - capital cost, 13(5.4)
 - lease cancellation payment, 13(5.5)
 - recaptured depreciation, 13(5.3)
 - capital cost, *see* Capital cost
 - capital cost allowance, *see also* Capital cost allowance
 - classes, Reg. Sch. II
 - capitalization of interest, 21(1), (3)
 - reassessment, 21(5)
 - certain transactions after 1971, ITAR 20(1.2)
 - change in proportions of use, 13(7)(d), 13(9)
 - change in use
 - deemed acquisition/disposition, 13(7)(a), (b), 13(9)
 - classes, for capital cost allowance, Reg. Sch. II
 - inclusions in, Reg. 1103
 - transfers between, Reg. 1103
 - cost of money borrowed to acquire, 21(1)
 - election, 21(1)
 - deductions allowed, Reg. Part XI
 - deemed, Reg. 1101(5g)
 - capital cost allowance, Reg. Sch. II:Cl. 36
 - separate classes, Reg. 1101(5g)
 - deemed capital cost of, 13(7.4)
 - deemed disposition/reacquisition
 - capital cost, deemed, 13(7)(f)
 - on death, 70(5)
 - defined, 13(21)
 - includes leasehold interest or option for limited purposes (partnership rollout), 98(7)
 - on windup of corporation, 88(1)(c.7)
 - depreciation, *see* Capital cost allowance
 - disposition of
 - after ceasing business, 13(8)
 - bad debt on, 20(4)
 - capital gain on, 39(1)(a)
 - on death
 - order of disposition, 70(14)
 - to child, farming or fishing property, 70(9), (9.01)
 - to spouse, 70(6); ITAR 20(1.1)
 - proceeds of disposition, defined, 13(21)
 - recapture, up to original cost, 13(1)
 - terminal loss, where no property left in class, 20(16)
 - divided use
 - change in ratio of uses, 13(7)(d)
 - deemed cost/proceeds of income-producing part, 13(7)(c)
 - dividend in kind, ITAR 20(1.4)
 - election re
 - deemed, 44(4)
 - exchanges of, 13(4)
 - exclusions from classes, Reg. 1102
 - first-year rule, Reg. 1100(2)–(2.4)
 - half-year rule, Reg. 1100(2)–(2.4)
 - manufacturing and processing business, acquired for
 - deemed capital cost of, 13(10)
 - manufacturing and processing enterprises, Reg. 1102(15), (16)
 - misclassified, 13(6)
 - prescribed class, of
 - transferred to corporation by shareholder, 85(1)(e), (e.1), (e.3), (e.4)
 - proceeds of disposition of, 13(21)
 - receipt of government grant, 13(7.1), (7.2)
 - recreational property, Reg. 1102(17)
 - replacement for, 13(4), (4.1)
 - rollover of
 - to corporation, 85(1)(e), 85(5)
 - to partnership, 97(2)
 - to trust, 107.4(3)(d)
 - sale of, *see* disposition of (*above*)
 - sale of mortgage, etc., 20(5), (5.1)
 - separate classes, Reg. 1101
 - transfer of
 - non-resident insurer, by, 138(11.8)
 - not at arm's length, 13(7)(e), 13(21.2)
 - on mutual fund rollover, 132.2(3)(c)
 - pre-1972, not at arm's length, ITAR 20(1.3)
 - to corporation, rules, 85(1)(e), 85(5)
 - to trust, qualifying disposition, 107.4(3)(d)
 - where UCC exceeds fair market value, 13(21.2)
 - uncollectible proceeds of disposition, 20(4)–(4.2)
 - undepreciated capital cost, 13(21)
- Depreciation**, *see also* Capital cost allowance
- double, in lieu of, Reg. 1100(1)(d)
 - property acquired before 1972, ITAR 18
- Deputy Minister**, *see* Commissioner of Revenue
- Derivative**, *see also* Eligible derivative
- election for mark-to-market treatment, 10.1(1)
 - excluded from inventory writedown, 10(15), 18(1)(x)
 - no mark-to-market treatment without election, 10.1(7)
- Derivative assessment**, 160
- Derivative forward agreement**
- defined, 248(1)
 - income inclusion, 12(1)(z.7)
 - addition to ACB, 53(1)(s), (t)
 - loss deduction, 20(1)(xx)
 - reduction in ACB, 53(2)(w), (x)
- Designated acquired corporation**
- defined, for FAPI rules, 95(1)
- Designated amount**
- of stock option, for employer election re cash-out, 110(1.2)
 - of trust, in respect of capital gains, 104(21.2)
- Designated area**
- defined in *Canadian Wheat Board Act*, 76(5)
- Designated asset**
- defined, for oil sands mine development project, 66.1(6)
 - defined, for oil sands project, Reg. 1104(2)
- Designated beneficiary**
- defined, 210(1)
 - excluded from trust designation of Part XII.2 tax paid, 210.2(3)
 - no deduction for income of trust paid to, 104(7)
- Designated benefit**, *see* Registered retirement income fund: designated benefit
- Designated city**
- defined, Reg. 7304(1)
- Designated Class 34 income**, Reg. 1100(24) [repealed]
- Designated corporation**
- defined, for FAPI rules, 95(2)(s)
- Designated country**, *see also* Designated treaty country
- defined, Reg. 8006
- Designated donor information**
- defined, 241(10)

- Designated donor information (*cont'd*)
- use of by RCMP or CSIS restricted, 241(9.1)
- Designated educational institution**
- defined, 118.6(1)
 - information return for tuition or scholarship, Reg. 203
 - registered educational savings plan, 146.1(1)“post-secondary educational institution”(a), 146.1(1)“trust”(d)
- Designated employee benefit**
- deductible when paid by employee life and health trust, 104(6)(a.4)
 - defined, 144.1(1)
 - excluded from employee benefit plan (EBP) benefits, 6(1)(g)(iv)
 - must be only object of ELHT, 144.1(2)(a)
 - no tax to employee on, 144.1(11)
- Designated entity**
- defined
 - for advanced life deferred annuity information return, Reg. 216(1)
 - for non-resident investment or pension fund, 115.2(3)(b)
- Designated financial institution**
- defined, 153(6), 160.5(1)
 - large remittances to be made at, 153(1)
 - exception, 153(1.4)
- Designated foreign insurance business**
- defined, 138(12)
- Designated gift (for charity disbursement rules)**
- deemed not spent on charitable activities, 149.1(1.1)(a)
 - defined, 149.1(1)
 - not included in receiving charity’s income, 149.1(12)(b)(i)
 - receiving charity need not disburse, 149.1(4.1)(d), 188.1(12)
- Designated immediate expensing property**
- defined, Reg. 1104(3.1)
- Designated income**, *see* Trust (or estate): designated income, tax on
- Designated insurance property**
- defined, 138(12), 248(1)
- Designated investment services**
- defined, re non-resident investment or pension fund, 115.2(1)
- Designated liquidation and dissolution**
- defined, 95(1)
 - excluded from pregnant-loss rules, 13(21.2)(e)(iii)(E)(I)2, 14(12)(g)(i)(B) [before 2017], 18(15)(b)(iv)(A)(II), 40(3.4)(b)(v)(A)(II), 40(3.5)(c)(iii)
- Designated member**
- defined, for small business deduction, 125(7)
- Designated money purchase provision (of pension plan)**
- condition for corrective contributions, 147.1(20)
 - defined, 147.1(1)
- Designated number**
- defined, 237(1.2)
 - requirement to provide, 237(1.1)
- Designated overburden removal cost**, Reg. 1104(2), Reg. Sch. II:Cl. 12(q)
- defined, Reg. 1104(2)
- Designated partnership**
- defined, for FAPI rules, 95(2)(t)
 - defined, for non-resident surplus stripping, 212.1(3)(e)
- Designated pension plan**, *see* Designated plan
- Designated person**
- benefit conferred on through corporation, 74.4(2)
 - exceptions, 74.4(4), 74.5(5)
 - special rules, 74.5(6)–(8)
 - benefit conferred on through trust, 74.3(1)
 - defined
 - for attribution rules, 74.5(5)
 - for communication of information, 241(10)
 - for FAPI transitional rules, 92(1.5)
- Designated person or partnership**
- defined, for foreign affiliate surplus calculations, Reg. 5907(1)
- Designated plan**, *see also* Individual pension plan
- defined, Reg. 8515(1)–(3)
 - defined, for registered pension plans, Reg. 8500(1)
- Designated pooled pension plan**
- defined, 147.5(1)
- Designated property**
- capital dividend account, re
 - defined, 89(1)
 - gain on excluded from calculation, 89(1)“capital dividend account”(a)(i)(C)(I), 89(1)“capital dividend account”(a)(ii)(C)(I)
 - foreign accrual property income, re
 - defined, 95(3.1)
- Designated province**
- for carbon tax refund to farmers, 127.42(1)
- Designated provincial program**
- defined
 - for RDSPs, 146.4(1)
 - for RESPs, 146.1(1)
- Designated provisions**
- defined, for look-through rule for certain trusts, 259(5)
- Designated rate**
- defined, Reg. 5100(1)
- Designated region, prescribed**
- credit for investment in, 127(9)“specified percentage”(a)(ii)(B), 127(9)“specified percentage”(a)(vi), 127(9)“specified percentage”(e)(i)(B)
 - defined, Reg. 4607
- Designated savings arrangement**
- defined, Reg. 8300(1)
- Designated securities lending arrangement**
- defined, 212(20)
 - non-resident withholding tax, 212(19)
- Designated shareholder**
- defined, Reg. 4901(2), (2.3)
- Designated stock exchange**
- defined, 248(1)
 - designation of by Minister of Finance, 262
- Designated taxation year**
- defined, Reg. 5907(1.6)
- Designated taxpayer information**
- defined, 241(10)
 - use of by RCMP, CSIS or FINTRAC, 241(9), (9.1)
- Designated treaty country**
- defined, Reg. 5907(11), (11.1), (11.11)
 - dividends from active income in, Reg. 5907(1)“exempt earnings”(d), “exempt loss”(c)
- Designated underground storage cost**
- defined, Reg. 1104(2)
- Designated withdrawal**
- defined, for Home Buyers’ Plan, 146.01(1)
- Designation**
- to treat capital gain as forgiven amount, 80.03(7)
- Designation year (re capital gains of trust)**
- defined, 104(21.2)
- Detaxers**, 2(1) (Notes), 248(1)“person” (Notes)
- Determination**, *see also* Assessment
- legal fees relating to, 56(1)(l), 60(o), 152(1.2)
 - Minister, by
 - general anti-avoidance rule application, 152(1.11)
 - losses, of, 152(1.1)
 - binding on Minister and taxpayer, 152(1.3)
 - following GAAR assessment, 152(1.11), (1.12)

- Determination (*cont'd*)
- treated like an assessment, 152(1.2)
 - notice of
 - date deemed made, 244(14), (15)
 - general anti-avoidance rule application, 152(1.11), 245(6)
 - losses, 152(1.1), 152(1.2)
 - mailing date, 244(14)
 - proof that not objected to, 244(10)
 - provisions applicable to, 152(1.2)
 - partnership income or loss, 152(1.4)–(1.8)
 - objection to, 165(1.15)
 - question, of, by Tax Court, 174
 - redetermination, 152(1.2)
 - tax consequences under general anti-avoidance rule, 245(5)
 - time, defined, 110.6(1)“qualified small business corporation share”
 - value of property, by Canadian Cultural Property Export Review Board, 118.1(10)
- Deuterium-enriched water**
- capital cost allowance, Reg. Sch. II:Cl. 26
- Development**, *see* Canadian development expense; Scientific research and experimental development
- Development phase (of oil sands project)**
- defined, Reg. 1104(2)
- Developmental program for children**, *see* Children’s Arts Tax Credit (pre-2017)
- Devices**
- for hearing- or sight-impaired, business expense, 20(1)(rr)
 - medical, credit for, 118.2(2), Reg. 5700
- Dex Resources TCC case overruled**, 66.1(6)“Canadian exploration expense”(d)(i), 66.1(9)(a)
- Diabetes**
- blood-sugar level measuring device, medical expense, Reg. 5700(s)
 - Type 1, qualifies for disability credit, 118.3(1.2)
- Diagnostic procedures**
- medical expenses, 118.2(2)(o)
- Diamond**
- extraction of, 248(1)“mineral resource”(d)(ii)
 - qualified investments for deferred income plans, Reg. 4900(1)(n.1)
- Diapers (for incontinence), medical expense**, 118.2(2)(i.1)
- Die, etc., capital cost allowance**, Reg. Sch. II:Cl. 12(d)
- Digester gas**
- defined, Reg. 1104(13)
 - included in eligible waste fuel, Reg. 1104(13)“eligible waste fuel”
- Digital news subscription**
- credit for, 118.02(2)
 - defined, 118.02(1)
- Digital versatile disc**, *see* Digital video disk (DVD)
- Digital video disk (DVD)**
- rental, capital cost allowance, Reg. Sch. II:Cl. 12(r)
 - excluded from half-year rule, Reg. 1100(2)C(b)(i)
- Diligence**, *see* Due diligence
- Diplomat**
- Canadian, abroad
 - deemed resident in Canada, 250(1)(c), 250(2)
 - reimbursement of allowance, non-taxable, 6(1)(b)(iii)
 - foreign, in Canada
 - exemption from tax, 81(1)(a), 149(1)(a), Canada-U.S. Tax Treaty:Art. XXVIII
- Direct equity percentage, defined**, 95(4)
- Direct financing lease**
- prescribed property for specified debt obligation definition, Reg. 9004
 - prescribed security for lending-asset definition, Reg. 6209(b)(iii)
- Directed donations**
- prohibited, 168(1)(f)
- Directed person (debt forgiveness rules)**
- defined, 80(1), 80.04(1)
 - eligible transferee, 80.04(2)
 - obligations issued by, 80(14)
- Director, Director General**
- duties delegated to, 220(2.01), Reg. 900
- Director (of corporation)**
- fees
 - income, 6(1)(c)
 - withholding tax, 153(1)(g)
 - liability of
 - for corporation’s unremitted source withholdings, 227.1
 - for offence of corporation, 242
- Disability**, *see* Mental or physical impairment
- Disability assistance payment**, *see also* Registered disability savings plan (RDSP)
- not counted for purposes of Canada Child Benefit, 122.6“adjusted income”
 - not counted for purposes of GST/HST Credit, 122.5(1)“adjusted income”
 - not counted for purposes of Old Age Security clawback, 180.2(1)“adjusted income”
 - tax on, 146.4(6)
 - withholding tax
 - non-resident, 212(1)(r.1)
 - resident, Reg. 153(1)(i)
- Disability benefit**, *see* Disability insurance; Disability pension
- Disability credit**, 118.3
- Disability Home Purchase Credit, 118.05**, *see* First-Time Home Buyer’s Credit and Disability Home Purchase Credit
- Disability insurance**
- benefits under, income, 6(1)(f); ITAR 19
 - employer’s contribution not a taxable benefit, 6(1)(a)(i)
 - top-up contributions by employer, *see* Disability policy
- Disability payments**
- military action, for
 - exempt, 81(1)(e)
- Disability pension**
- CPP, *see* Canada Pension Plan/Quebec Pension Plan: disability pension
 - RCMP, exempt, 81(1)(i)
- Disability policy**
- defined, 6(17)
 - top-up payments on insolvency of insurer, 6(18)
 - reimbursement to employer, 8(1)(n.1)
- Disability-related building modifications**
- deductible, 20(1)(qq)
 - medical expense credit, 118.2(2)(l.2)
- Disability-related devices and equipment**
- deductible, 20(1)(rr)
- Disability-related employment benefits**
- when not included in income, 6(16)
- Disability supports deduction**, 64
- Disability tax credit**, 118.3
- Disabled**
- defined (for pension plan), Reg. 8500(1)
- Disabled person**, *see* Mental or physical impairment
- Disappearing source rule (interest deductibility)**, 20.1
- Disbursement excess**
- registered charity, of, carryforward, 149.1(20)
 - defined, 149.1(21)

Disbursement quota

- anti-avoidance rule, 149.1(4.1)
- defined
- • for charitable foundation, 149.1(1), Reg. 3701
- • for charitable organization, 149.1(21)(c)

Disclaimer, defined, 248(9)**Disclosure of information**

- by CRA, *see* Communication of information (by CRA)
- to CRA, *see* Information return

Discontinuance of business, *see* Ceasing to carry on business**Discontinuance of venture capital business**

- meaning of, 204.8(2)
- penalty tax, 204.841

Discount, *see also* Bond: discount

- defined, pre-1972 obligation, ITAR 26(12)

Discounted bonds, *see* Bond: discount**Discovery well costs**

- allowed as CEE before 2019, 66.1(6)“Canadian exploration expense”(d)(i)

Discretion of Minister, *see* Minister (of National Revenue)**Discrimination, Canada-U.S. Tax Treaty:Art. XXV****Dishonoured cheque, *see* Cheque: dishonoured****Disposed share**

- defined, for foreign affiliate liquidation and dissolution, 88(3)(d)

Disposing affiliate

- defined, 88(3.1), 93(1), 95(1)“designated liquidation and dissolution”

Disposing corporation

- defined, 93(1)

Disposition

- capital gain, 39(1)(a), 40(1)
- child, to, 40(1.1)
- deceased taxpayer, of, 70(5), 164(6)
- deemed
- • by trust, every 21 years, 104(4)
- • mark-to-market property, by financial institution, 142.5(2)
- • on becoming a financial institution, 142.6(1)(b)
- • on ceasing to be a financial institution, 142.6(1)(c)
- • on ceasing to be resident, 128.1(4)(b)
- • on death, 70(5)–(10)
- • on gift, 69(1)(b)(ii)
- • synthetic disposition arrangement, 80.6(1)
- • where spousal trust distributes property to other person, 107(4)
- deemed contribution of capital, where, 53(1.1)
- deferral of tax on, *see* Rollover
- defined, 248(1)
- • satisfaction of obligation, deemed not to be, 49.1
- depreciable, *see* Depreciable property
- income interest in trust, 106(2)
- involuntary, election re, 13(4)
- • deemed, 44(4)
- land used in farming business of partnership, 101
- life insurance policy, interest in, 248(1)“disposition”(b.1)
- loss on, *see* Loss(es); Stop-loss rules
- non-resident, by, 116(1)–(6)
- • certificate, 116(2)
- • notice, 116(3)
- • treaty-protected property, 116(5.01), (5.02)
- • where tax deferred under tax treaty, 115.1
- of interest in life insurance policy, 148(9), Reg. 217(1)
- partnership, on ceasing to exist, 98
- personal-use
- • capital loss nil, 40(2)(g)(iii)
- principal residence, *see* Principal residence
- proceeds of, *see* Proceeds of disposition

- purchaser corporation controlling or controlled by taxpayer, 40(2)(a)(ii)
- subsequent to debt forgiveness, 80.03(2)
- to a trust, no change in beneficial ownership, 69(1)(b)(iii)
- together with services, allocation rule, 68
- trust, to
- • capital loss nil, 40(2)(g)(iv)

Dispute, taxes in

- whether taxpayer required to remit, 164(1.1)(d), 225.1

Dissolution, *see* Winding-up**Distress preferred share, 80.02**

- constitutes commercial obligation, 80(1)“commercial obligation”
- constitutes excluded security, 80(1)“excluded security”
- defined, 80(1)
- disposition of following debt forgiveness, no deemed capital gain, 80.03(2)
- settled
- • effect of, where subsidiary wound up into parent, 80.01(5)
- • meaning of, 80.02(2)(c), 80.02(7)(a)
- share ceasing to be, 80.02(7)
- substituted for debt, 80.02(3)
- substituted for other distress preferred share, 80.02(5)
- substitution of commercial debt obligation for, 80.02(4)
- substitution of other share for, 80.02(6)

Distributing corporation

- defined, 55(1)“distribution”

Distribution

- for butterfly purposes, defined, 55(1)
- from TFSA, defined, 146.2(1)
- of property by non-resident trust, reporting requirement, 233.5
- on winding-up, 84(2), (6)
- tax, *see* Corporate distributions tax

Distribution equipment

- capital cost allowance, Reg. Sch. II:Cl. 47
- defined (re energy conservation CCA), Reg. 1104(13)

Distribution tax

- on income trusts, *see* SIFT trust: distributions to unitholders
- on partnerships, *see* SIFT partnership: distributions to partners

Distribution tax on income trusts, *see* SIFT trust**Distribution time**

- defined, 128.1(7)(b)

Distribution year

- defined
- • for postponement of tax on distribution by trust to non-resident beneficiary, 220(4.6)(a)
- • for foreign tax credit of trust, 126(2.22)

District

- defined, Reg. 1802(5)

District energy equipment

- capital cost allowance, Reg. Sch. II:Cl. 43.1(a)(iii.1), 43.1(d)(xv)
- defined, Reg. 1104(13)

District energy system, *see also* District energy equipment

- conditions for Class 43.1/43.2 treatment, Reg. 1104(16)
- defined, Reg. 1104(13)

Divestment obligation percentage

- avoidance of, 188.1(3.2)–(3.5)
- defined, for private foundations, 149.1(1)
- penalty for having, 188.1(3.1)
- private foundation can be revoked for having, 149.1(4)(c)

Dividend

- capital, *see* Capital dividend
- capital gains dividend
- • mutual fund corporation, election, 131(1)–(1.4)
- compensation, *see* Securities lending arrangement: dividend compensation payment

Index

Dividend (*cont'd*)

- deemed, 84
- added to cost base of share, 53(1)(b)
- capital gains subject to income-splitting tax, 120.4(4), (5)
- dividend stripping, 84.1(1)(b), 212.1(1.1)(a)
- foreign affiliate dumping, 212.3(2)(a)
- guaranteed share, on, 84(4.3)
- income trust distribution, 104(16)
- interest on income bond, 15(3)
- non-resident corporation, 15(4)
- non-resident surplus strips, 212.1, 212.2
- on corporation becoming resident in Canada, 128.1(1)(c.1), (c.2)
- on demutualization of insurance corporation, 139.1(2)(j)
- on disposition of share of foreign affiliate, 93(1)
- on distribution by mutual holding corporation, 139.2
- partnership distribution, 96(1.1)(b)
- redemption of share, 84(3)
- reduction of paid-up capital, on, 84(4), (4.1)
- SIFT trust distribution, 104(16)
- surplus stripping, 84.1(1)(b), 212.1(1.1)(a)
- term preferred share, on, 84(4.2), 258(2)
- thin capitalization, 214(16), (17)
- windup of business, 84(2)
- deemed not received, 55(2)–(5)
- deemed paid
 - deemed payable when, 84(7)
 - where not deemed received, 84(8)
- deemed proceeds of disposition of share, or capital gain, 55(2)–(5)
- deemed received where attribution rules apply, 82(2)
 - where not applicable, 84(8)
- defined, 248(1)
 - for stop-loss rules, 112(6)(a)
 - for treaty purposes, Canada-U.S. Tax Treaty:Art. X:3
- disqualifies paying corp from CEWS, 125.7(2.01)
- election re
 - excessive, 184(3), (3.1)–(5)
- employees profit sharing plan, allocation by, 144(8)
- excluded from tax under Part VI.1, 191(1)
- exempt, on share of foreign affiliate, 93(3)
- foreign affiliate, from, 20(13), 95(1), 113(1), Reg. 5900
- foreign business corporation, from, received by non-resident, 213
- gross-up, 82(1)(b)
- guarantee agreement re
 - no deduction, 112(2.2)–(2.22)
- in kind
 - cost of, 52(2)
 - depreciable property as, ITAR 20(1.4)
 - includes stock dividend, 248(1)
 - income, 12(1)(j), (k), 82(1), 90
 - whether specified investment business, 125(7)“specified investment business”
- insurance corporation
 - to policyholders, 140(1)
- life insurance policy, 148(2)
- mortgage investment corporation, from
 - deemed bond interest, 130.1(2), (3)
- non-resident corporation, from, 90
- non-taxable
 - portion not included in beneficiary’s income
 - mutual fund trust, 132(3)
 - received by trust
 - designation re, 104(20)
 - ownership certificate required, 234
 - paid
 - by non-resident corporation
 - out of exempt surplus, 113(1)(a)
 - out of hybrid surplus, 113(1)(a.1)
 - out of pre-acquisition surplus, 113(1)(d)
 - out of taxable surplus, 113(1)(b), (c)
 - in excess of elective amount, tax on, 184
 - to non-resident
 - foreign business corporation, by, 213
 - tax on, 212(2)
 - United States resident, Canada-U.S. Tax Treaty:Art. X
 - patronage, *see* Patronage dividends
 - received
 - amount included in income, 82(1), 90
 - by broker/dealer, withholding tax, 153(4), (5)
 - by corporation
 - deduction from income, 112(1), (2)
 - stop-loss rules, 112(2.1)–(2.9)
 - by financial institution, 112(5)–(5.2)
 - by prescribed venture capital corporation, deemed not taxable dividend, 186.2
 - by spouse, transfer of, 82(3)
 - by trust, allocation to beneficiary, 104(19), (20)
 - gross-up, 82(1)(b)
 - refund, *see* Dividend refund
 - rental arrangement, *see* Dividend rental arrangement
 - short-term preferred share, 112(2.3)
 - simultaneous, 89(3)
 - stock, *see also* 248(1)“dividend”
 - amount of, 95(7), 248(1)“amount”
 - cost of, 52(3)
 - deemed to be substituted property, 248(5)(b)
 - defined, 248(1)
 - excluded from deemed dividend, 84(1)(a)
 - paid as benefit, 15(1.1)
 - “stop-loss” rule, 112(3), (3.1), (3.2), (4), (4.2), (4.3), (7)
 - stripping, *see* Surplus stripping
 - tax credit, 121
 - taxable
 - allocation of, by credit union, 137(5.1), (5.2)
 - amalgamation, on, 87(2)(x)
 - deduction from tax otherwise payable, 121
 - defined, 89(1)“taxable dividend”, 112(6)(a), 129(7), 248(1)
 - received by private corporation, tax on, 186
 - received by trust, designation re, 104(19)
 - taxable corporation, from
 - life insurer, received by, 138(6)
 - term preferred shares, on
 - received by specified financial institution, 112(2.1)
 - unclaimed at year-end
 - withholding tax, 153(4)
 - effect of remittance, 153(5)
 - **Dividend allowance**
 - defined, for Part VI.1 tax, 191.1(2)
 - **Dividend compensation payment**, *see* Securities lending arrangement: dividend compensation payment
 - **Dividend-like redemption**
 - **Dividend payer**
 - defined, for capital gains stripping rules, 55(3)(a)(iii)(A)
 - **Dividend received deduction**
 - dividend from Canadian corporation, 112(1)
 - dividend from foreign corporation, 112(1)
 - **Dividend recipient**
 - defined, for capital gains stripping rules, 55(3)
 - **Dividend refund**, *see also* Refundable dividend tax on hand
 - defined, 129(1)
 - interest on, 129(2.1), (2.2)
 - mutual fund corporation, to, 131(5)
 - private corporation, to, 129
 - application to other liability, 129(2)

Dividend refund (*cont'd*)

- dividends deemed not to be taxable dividends, 129(1.2)

Dividend reinvestment plan

- whether taxable as shareholder benefit, 15(1)

Dividend rental arrangement, *see also* Securities lending arrangement

- defined, 248(1)
- gross-up and credit denied, 82(1)(a)(i), 82(1)(c)
- intercorporate dividend deduction denied, 112(2.3)
- no deduction for dividends received under, 112(2.3)
- share, *see* DRA share

Dividend stripping, *see* Surplus stripping**Dividend tax**

- refundable, *see* Refundable dividend tax on hand

Dividend tax credit, 121**Dividend time**

- defined, for foreign affiliate dumping rules, 212.3(4)

Division of property, *see* Partition of property**Divisive reorganization**, 55(1), 55(3)(b)**Divorce and separation**

- alimony, maintenance or support, *see* Support payments (spousal or child)
- attribution rules do not apply
 - generally, 74.5(3)
 - RRSP withdrawals, 146(8.3)
- deferred profit sharing plan rights, transfer of, 147(2)(e)(i), 147(19)
- registered education savings plan, rights transferred, 204.91(3)
- reimbursement of legal expenses, not taxable, 56(1)(l.1)
- separation agreement defined, 248(1)
- tracing of property transfer does not apply, 160(4)
- transfer of DPSP funds to spouse's RPP, RRSP or RRIF, 147(2)(e)(i), 147(19)
- transfer of RPP funds to spouse's RPP, RRSP or RRIF, 147.3(5)
- transfer of RRIF funds to spouse's RRSP or RRIF, 146.3(14)
- transfer of RRSP funds to spouse's RRSP or RRIF, 146(16)(b)

Dock

- capital cost allowance, Reg. Sch. II:Cl. 3
- for mine, Reg. Sch. II:Cl. 10(1)

Documentary evidence

- defined, for Common Reporting Standard, 270(1)

Documentary production

- whether qualifies for Canadian film/video tax credit, Reg. 1106(9)

Documentation

- contemporaneous, for transfer pricing audit, 247(4)

Documentation — due date

- defined (for transfer pricing), 247(1)

Documents, *see also* Books and records

- demand for, 231.2(1)(b)
- examination of, where privilege claimed, 232(3.1)–(7)
- execution of, by corporations, 236
- foreign-based, 143.2(13), (14), 231.6
- proof of, 244(9), (13)
- requirement to provide, 231.2
- compliance order, 231.7
- interference with CRA official, 231.5(2)
- seized
 - copies of, 231.5
 - seizure of, 231.3(5)–(8)
 - where privilege claimed, 232(3), (4)–(7)
- transfer pricing, 247
- waiver of requirement to file, 220(3.1)

Dog, *see* Guide dog expenses; Animal**Dollar amounts in legislation and regulations**

- functional currency to be used when election made, 261(5)(b)
- \$0 proceeds of disposition of shares or debt when corporation goes bankrupt, 50(1)
- \$0.27/km car operating expenses benefit for 2021, Reg. 7305.1(a)
- \$0.28/km car operating expenses benefit for 2019–2020, Reg. 7305.1(a)
- \$0.27/km car operating expenses benefit for 2022, Reg. 7305.1(a)
- \$0.59 and \$0.53/km car allowances for 2019–2021, Reg. 7306
- \$0.61 and \$0.55 per km car allowances for 2022, Reg. 7306
- \$1 deemed PUC increase on stock dividend by Canadian Wheat Board, 135.2(12)
- \$2 below which balance neither demanded nor refunded by CRA, 161.4
- \$2 per day home office expense deduction without receipts, 8(13) [Announced Administrative Change]
- \$3.75 per day residing in prescribed intermediate zone, deduction, 110.7(1)(b)(ii)(A), 110.7(2)
- \$8.25 per day maintaining household in prescribed intermediate zone, 110.7(1)(b)(ii), 110.7(2)
- \$8.25 per day extra, residing in prescribed northern zone, 110.7(1)(b)(ii)(A)
- \$10 daily penalty for late-filed information returns, 162(7.01)(a)
- \$10 per day penalty for trustee/receiver failing to file return, 162(3)
- \$15 daily penalty for late-filed information returns, 162(7.01)(b)
- \$16.50 per day maintaining household in prescribed northern zone, 110.7(1)(b)(ii)
- \$20 monthly amount for part-time student's textbook credit, 118.6(2.1)B(b)
- \$20 monthly Canada Child Benefit threshold for annual advance payment, 122.61(2)
- \$25 daily penalty for late-filed information returns, 162(7.01)(c)
- \$25 penalty for tax preparer not filing T1 return electronically, 162(7.3)(a)
- \$25 per day penalty for failing to comply with obligation, 162(7), (7.1)
- \$25 up to which interest and penalty may be cancelled, 161.3
- \$50 above which donation returned by charity must be reported on information return, 110.1(16), 118.1(27)
- \$50 credit for U.S. social security tax changes under treaty, Canada-U.S. Tax Treaty:Art. XVIII:5
- \$50 daily penalty for late-filed information returns, 162(7.01)(d)
- \$50 maximum penalty for trustee/receiver failing to file return, 162(3)
- \$50 minimum interest to be reported by financial institution, Reg. 201(1) (Notes)
- \$50 penalty for actions re ownership certificate, 162(4)
- \$50 per day of conference expenses deemed paid for meals/entertainment, 67.1(3)
- \$50 threshold for advance payment of GST/HST Credit, 122.5(3.1)
- \$65 monthly amount for student's textbook credit, 118.6(2.1)B(a)
- \$75 daily penalty for late-filed information returns, 162(7.01)(e)
- \$75 per year maximum digital news subscription credit, 118.02(2)
- \$100 minimum fees for tuition credit, 118.5(1)(c), 118.5(1.1)
- \$100 minimum penalty for failing to comply with obligation, 162(7), (7.1)
- \$100 minimum penalty for false statement or omission, 163(2)
- \$100 minimum penalty for late-filed information returns, 162(7.01)
- \$100 minimum penalty for late renunciation, 66(12.75)
- \$100 minimum penalty for non-resident corporation failing to file return, 162(2.1)(b)(i)

Index

Dollar amounts in legislation and regulations (*cont'd*)

- \$100 monthly penalty for late-filed election re foreign affiliate dumping, 212.3(13)
- \$100 monthly penalty for late-filed election re loan to non-resident corporate shareholder, 15(2.13)
- \$100 monthly Universal Child Care Benefit, 56(6)
- \$100 optional CCA deduction for timber limit or right to cut timber, Reg. Sch. VI:4
- \$100 penalty for failing to provide SIN or information on a form, 162(5), (6)
- \$100 penalty for paying or remitting amount over \$10,000 non-electronically, 162(7.4)
- \$100 penalty for tax preparer not filing T2 return electronically, 162(7.3)(b)
- \$100 per month penalty for late-filed elections, 85(8), 93(6), 96(6), 220(3.5)
- \$100 per partner per month penalty for failing to file partnership information return, 162(8)
- \$100 per week, certain child care expenses for child 7–15 before 2015, 63(3)“annual child care expense amount”(b)(ii), 63(3)“periodic child care expense amount”
- \$100 threshold for withholding on patronage dividends, 135(3)
- \$125 per week, certain child care expenses for child 7–15, 63(3)“annual child care expense amount”(b)(ii), 63(3)“periodic child care expense amount”
- \$140 monthly amount for part-time student’s education textbook credit, 118.6(2)B(a), (2.1)B(a)
- \$150 max credit to teacher for school supplies 2016–2020, 122.9(2)
- \$170 credit to offset pension income, 118(3)
- \$175 per week, certain child care expenses for child under 7 before 2015, 63(3)“annual child care expense amount”(b)(i), 63(3)“periodic child care expense amount”
- \$200 below which tool, utensil or medical/dental instrument fully deductible before May 2/06, Reg. Sch. II:Cl. 12(c), (e), (h)
- \$200 cash allowed for fractional interest in share, 107.4(2.1)
- \$200 foreign currency gain or loss ignored for individual, 39(1.1)
- \$200 maximum charitable donations for low-rate credit, 118.1(3)
- \$200 per week, certain child care expenses for child under 7, 63(3)“annual child care expense amount”(b)(i), 63(3)“periodic child care expense amount”
- \$200 work of art deemed not depreciable property, Reg. 1102(1)(e)(i)
- \$215 per square metre hand-woven carpet deemed not depreciable property, Reg. 1102(1)(e)(ii)
- \$250 max credit to teacher for school supplies from 2021, 122.9(2)
- \$250 maximum labour-sponsored funds tax credit for 2016, 127.4(5)(a)
- \$250 maximum non-universal ancillary fee eligible for tuition credit, 118.5(3)(d), 118.5(4)(d)
- \$250 penalty for not filing information return electronically, 162(7.02)(a)
- \$250 per week, certain child care expenses for disabled child before 2015, 63(3)“annual child care expense amount”(a), 63(3)“periodic child care expense amount”
- \$250 per year earned-income accumulation for training credit, 122.91(2)(a)(i)B(A)
- \$250 super credit for first-time donor to charity until 2017, 118.1(3.1)
- \$250 teachers’ exchange fund contribution deductible, 8(1)(d)
- \$275 per week, certain child care expenses for disabled child since 2015, 63(3)“annual child care expense amount”(a), 63(3)“periodic child care expense amount”
- \$300 contribution to RPP in 1944–45, income from RPP reduced, 57(4)
- \$300 (indexed) maximum monthly tax-free lodging allowance for amateur junior hockey players, 6(1)(b)(v.1)
- \$300 minimum CPP/QPP or Child Care benefits, allocated to prior year, 56(8)(b)
- \$300 per child additional COVID-19 Canada Child Benefit for 2020, 122.61(1.01)
- \$300 per month interest deduction limit for automobile for 2001–2022, 67.2, Reg. 7307(2)
- \$306 per additional dependant COVID-19 GST Credit for 2020, 122.5(3.001)A(a)
- \$375 maximum weekly disability supports deduction for student, 64(b)(ii)(B)
- \$400 maximum home office expense deduction without receipts for 2020, 8(13) [Announced Administrative Change]
- \$400 political contribution for 75% credit, 127(3)(a)
- \$450 volunteer firefighter credit, 118.06(2)
- \$465 monthly amount for education and textbook credit, 118.6(2)B(a), (2.1)B(a)
- \$500 below which tool, utensil or medical/dental instrument fully deductible before May 2/06, Reg. Sch. II:Cl. 12(c), (e), (h)
- \$500 maximum contribution to personal trust by individual before Oct. 11/02, to not trigger non-resident trust rules, 94(2)(u)(ii)(C)(II)
- \$500 maximum fine for issuing debt with interest coupons lacking “AX” or “F” marking, 240
- \$500 maximum home office expense deduction without receipts for 2021–22, 8(13) [Announced Administrative Change]
- \$500 maximum tradesperson’s tools deduction, 8(1)(s)
- \$500 minimum holding (each) of shares by non-insiders for corporation to be designated public or trust to be mutual fund trust, Reg. 4800(1)(b)(iv), 4800(2)(b)(iv), 4801, 4803(3), (4)
- \$500 minimum holding of each of 150 beneficiaries for FAPI, 95(1)“exempt trust”(b)
- \$500 minimum holding of each of 150 shareholders to not be closely held, 94(1)“closely-held corporation”(b); 94(1)“exempt foreign trust”(h)(ii)(A), 94(14)(b)(ii)(B)
- \$500 minimum penalty re tax shelter identification number, 237.1(7.4)
- \$500 non-taxable reimbursement to employee for computer or furniture for COVID-19 work at home, 6(1)(a) Notes
- \$500 penalty for charity failing to file information returns, 188.1(6)
- \$500 penalty for failing to provide Taxpayer Identification Number so CRA can share information with foreign country, 281(3)
- \$500 penalty for failure to provide Taxpayer Identification Number to financial institution for provision to foreign tax authorities, 281(3)
- \$500 penalty for not filing information return electronically, 162(7.02)(b)
- \$500 per month minimum penalty for late-filed R&D non-profit corporation return, 149(7.1)A(a)
- \$500 per month penalty for failure to provide foreign-based information, 162(10)
- \$500 per month penalty for late-filed elections, 83(4), 131(1.3), 184(5)
- \$500 per week penalty for missing mandatory disclosure, 237.3(8)(a)(ii), 237.4(8)(a)(ii)
- \$500 per year maximum expense for digital news subscription credit, 118.02(2)B(a)
- \$500 tax-free gift or award to employee (CRA administrative policy), 6(1)(a) (Notes)
- \$500 threshold below which no penalty for failure to remit withholdings, 227(9.1)
- \$580 COVID-19 GST Credit for 2020, 122.5(3.001)A(a)
- \$600 minimum RRSP contribution (pension credit offset), Reg. 8301(6), 8309, 8503(4)(a)(i)(B)
- \$600 pension adjustment offset, Reg. 8300(1)“PA offset”(b)
- \$650 maximum moving expenses, non-taxable reimbursement to employee, *see* Notes to 6(1)(b)
- \$650 maximum political contribution credit, 127(3)(c)(i)
- \$665 monthly threshold for OAS benefits withholding, 180.2(4)(a)(ii)
- \$750 First-Time Home Buyer’s Credit until 2021, 118.05(3)
- \$750 maximum deductible health plan premium per child, 20.01(2)(c)C

Dollar amounts in legislation and regulations (*cont'd*)

- \$750 maximum labour-sponsored funds tax credit, 127.4(5)(a), Reg. 100(5)(a)
- \$750 maximum labour-sponsored funds tax credit before 2015, 127.4(5)(a), Reg. 100(5)(a)
- \$750 maximum tuition and education credits transferred, 118.81(a)A(ii)
- \$800 per month leasing cost limit for automobile for 2001–2021, 67.3, Reg. 7307(3)(b)A(v)
- \$847 maximum weekly wage covered by COVID-19 wage subsidy to July 4/20, 125.7(2)A(a)(i)(B), (ii)(C)
- \$900 per month leasing cost limit for automobile for 2022, 67.3, Reg. 7307(3)(b)A(v)
- \$1,000 antique furniture or object deemed not depreciable property, Reg. 1102(1)(e)(iv)
- \$1,000 artists' employment expenses deductible, 8(1)(q)
- \$1,000 charitable donation limit for first-time donor super credit, 118.1(3.1)
- \$1,000 employment income eligible for Canada Employment Credit, 118(10)B(a)
- \$1,000 instalment interest threshold below which no penalty applies, 163.1(b)
- \$1,000 maximum allowable for medical expense credit air conditioner for chronic ailment, Reg. 5700(c.3)
- \$1,000 maximum exemption from income of volunteer emergency or search-and-rescue worker, 81(4)
- \$1,000 maximum expense for teacher school-supplies credit, 122.9(2)B(a)
- \$1,000 maximum refundable medical expense credit, 122.51(2)A(a)
- \$1,000 minimum ACB and proceeds of personal-use property, 46
- \$1,000 minimum cost for electronic equipment to be optionally in separate class, Reg. 1101(5p)
- \$1,000 minimum cost for M&P property to be optionally in separate CCA class, Reg. 1101(5s)
- \$1,000 minimum fine for offence, 238(1)(a)
- \$1,000 minimum penalty for false statement by third party, 163.2(3), (5)
- \$1,000 minimum RRSP contribution (pension credit offset), Reg. 8301(6), 8309, 8503(4)(a)(i)(B)
- \$1,000 monthly threshold for quarterly source deductions remittance for new small employers, Reg. 108(1.4)(b)(i)
- \$1,000 penalty for failing to provide SR&ED claim preparer information, 162(5.1)
- \$1,000 penalty for not filing corporate return electronically, 162(7.2)
- \$1,000 per day advisor/promoter penalty for missing mandatory disclosure, 237.3(8)(b)(iii), 237.4(8)(b)(iii)
- \$1,000 per day penalty, failure by Canadian Wheat Board Farmers' Trust to file information return, 135.2(16)
- \$1,000 per month penalty for failing to provide foreign-based information, 162(10)
- \$1,000 per year gain on farm that is principal residence, election to exempt, 40(2)(c)(ii)
- \$1,000 threshold for apprentice car mechanic tools deduction, 8(1)(r)(ii)B(B)
- \$1,000 threshold for charity penalties to be reduced by charitable transfer, 189(6.3)
- \$1,000 threshold for charity revocation tax to be reduced by charitable expenditure or transfer, 189(6.2)
- \$1,000 threshold for tradesperson's tools deduction, 8(1)(s)
- \$1,129 maximum weekly wage covered by COVID-19 wage subsidy from July 5/20, 125.7(2)A(b)(ii)G(B)
- \$1,129 weekly remuneration cap for Canada Recovery Hiring Program, 125.7(1)"total current period remuneration"(a), "total base period remuneration"(a)
- \$1,200 standard amount for northern residents deduction, 110.7(6)"standard amount"
- \$1,275 maximum political contribution for credit, 127(3)(c)
- \$1,375 maximum 10% wage subsidy per employee for COVID-19 in 2020, Reg. 111
- \$1,500 First-Time Home Buyer's Credit from 2022, 118.05(3)
- \$1,500 (indexed after 1988) threshold for medical expense credits for high-income taxpayers, 118.2(1)C
- \$1,500 maximum deductible health plan premium per person, 20.01(2)(c)B
- \$1,500 penalty for not filing information return electronically, 162(7.02)(c)
- \$1,500 per year of employment before 1989, additional retiring allowance transferred to RRSP, 60(j.1)(ii)(B)
- \$1,722.22 defined benefit limit before 1999, Reg. 8500(1)"defined benefit limit"(a)
- \$1,800 threshold for instalments by Quebec residents, 156.1(1)
- \$2,000 apprenticeship expenditure limit for investment tax credit, 127(9)"apprenticeship expenditure"(a)
- \$2,000 deduction from income of dining or recreational club, 149(5)(f)(i)
- \$2,000 moving expenses for person with mobility impairment, medical expense credit, 118.2(2)(1.5)
- \$2,000 pension income, credit to offset, 118(3)
- \$2,000 per week penalty for large corp missing mandatory disclosure, 237.3(8)(a)(i), 237.4(8)(a)(i), 237.5(5)
- \$2,000 per year of employment before 1996, retiring allowance transferred to RRSP, 60(j.1)(ii)(A)
- \$2,000 pre-1986 capital loss balance deductible against any income, 111(1.1)(b)(i)
- \$2,000 RRSP overcontribution room, 204.2(1.1)(b)C
- \$2,500 maximum employee life and health benefits to key employees, 144.1(2)(e)(ii)A
- \$2,500 maximum penalty for failing to comply with obligation, 162(7), (7.1)
- \$2,500 maximum penalty for non-resident corporation failing to file return, 162(2.1)(b)(ii)
- \$2,500 maximum RESP assistance to part-time student, 146.1(2)(g.1)(ii)(B)
- \$2,500 minimum employment/business income for refundable medical expense credit, 122.51(1)"eligible individual"(c)
- \$2,500 minimum penalty for false statement in return re distribution from foreign trust, 163(2.4)(e)(i)
- \$2,500 minimum penalty for gross-negligence false statement in trust return, 163(6)
- \$2,500 penalty for not filing information return electronically, 162(7.02)(d)
- \$2,500 restricted farm loss fully deductible, 31(1)
- \$3,000 income offset by volunteer firefighter credit, 118.06(2)
- \$3,000 income offset by volunteer search-and-rescue credit, 118.07(2)
- \$3,000 maximum incorporation expenses deductible, 20(1)(b)
- \$3,000 minimum lump-sum payment for retroactive spreading over prior years, 110.2(2)
- \$3,000 monthly threshold for quarterly source deductions remittance, Reg. 108(1.12)
- \$3,000 scholarship exemption before 2006, 56(3)(b)(i)
- \$3,000 threshold for requiring individual or corporate instalments, 156.1(1), 157(2.1)
- \$3,500 deduction for refunds of past service AVCs, 60.2(1)(b)
- \$3,500 maximum employee's RPP contribution for pre-1990 service, 147.2(4)(b), (c)
- \$3,500 per year of employment, retiring allowance transferred to RRSP, 60(j.1)(ii)
- \$4,000 child care expenses per child age 7–15 before 2015, 63(3)"annual child care expense amount"(b)(ii)
- \$4,000 maximum labour mobility deduction, 8(1)(t)
- \$5,000 and under non-periodic payment, withholding requirement, Reg. 103(1), (4)(a)
- \$5,000 child care expenses per child age 7–15, 63(3)"annual child care expense amount"(b)(ii)
- \$5,000 federal purchase incentive for zero-emission vehicles, Reg. 1102(26)
- \$5,000 gift to registered journalism organization, disclosure of donor, 149.1(14.1)
- \$5,000 income threshold to be deemed not financially dependent on annuitant, 146(1)"refund of premiums"
- \$5,000 maximum amount for First-Time Home Buyer's Credit and Disability Home Purchase Credit until 2021, 118.05(3)

Index

Dollar amounts in legislation and regulations (*cont'd*)

- \$5,000 maximum annual TFSA contribution 2009–12, 207.01(1)“TFSA dollar limit”(a)
- \$5,000 maximum cost of wheelchair-access van for medical expense credit, 118.2(2)(1.7)
- \$5,000 maximum deductible cost of maintaining old residence after moving, 62(3)(g)
- \$5,000 maximum education and tuition amounts transferred to spouse, parent or grandparent, 118.81(a)A(ii)
- \$5,000 maximum fine for communicating confidential information or SIN, 239(2.2), (2.21), (2.3)
- \$5,000 maximum gain or loss from obligation, not to be specified debt obligation, Reg. 9202(4)(c)
- \$5,000 maximum purchase for labour-sponsored funds tax credit, 127.4(5)(a), 127.4(6)(a)
- \$5,000 maximum RESP payments until student enrolled for 13 weeks, 146.1(2)(g.1)(ii)(A)(II)
- \$5,000 maximum training amount limit for Canada Training Credit, 122.91(2)(a)(ii)
- \$5,000 maximum tuition/education amounts transferred to parent, 118.81(a)A(ii)D
- \$5,000 minimum FAPI for participating percentage calculation, 95(1)“participating percentage”
- \$5,000 penalty for using or possessing zipper software or hardware, 163.3(2)(a), (3)(a)
- \$5,000 threshold for withholding rate on RDSP disability assistance payment, Reg. 103.1(2)C(a), (b)
- \$5,000 transfer to outside organization above which charity must disclose on public information return, Reg. 3703
- \$5,400 annual Canada Child Benefit for child age 6–17, 122.61(1)A:E(b)
- \$5,500 maximum annual TFSA contribution 2013–14 and 2016–18, 207.01(1)“TFSA dollar limit”(b), (d)
- \$6,000 maximum annual TFSA contribution 2019–21, 207.01(1)“TFSA dollar limit”(d)
- \$6,400 annual Canada Child Benefit for child under 6, 122.61(1)A:E(a)
- \$8,000 child care expenses per child under 7, 63(3)“annual child care expense amount”(b)(i)
- \$8,000 limitation on RPP past service benefits, Reg. 8307(2)(b)
- \$8,000 maximum penalty for late-filed elections, 85(8), 93(6), 96(6), 220(3.5)
- \$8,000 RRSP overcontribution room, 204.2(1.1)(b)M
- \$8,750 maximum restricted farm loss deduction before 2013, 31(1)(a)(ii)
- \$10,000 above which payment to CRA must be electronic, 160.5(2)
- \$10,000 employment income of Canadian resident from U.S. or U.S. resident from Canada not taxable, Canada-U.S. Tax Treaty:Art. XV:2(a)
- \$10,000 external income threshold for deduction of private health plan premiums, 20.01(1)(a)(ii)
- \$10,000 international electronic funds transfer must be reported to CRA, 237.3 [end]
- \$10,000 limit for attendant care credit for disabled person, 118.2(2)(b.1)
- \$10,000 limit to clergy residence deduction, 8(1)(c)(iv)(A)(I)
- \$10,000 max expenditures per location for air quality improvement credit, 127.43(1)“total per location expense”(b)
- \$10,000 maximum amount for First-Time Home Buyer’s Credit and Disability Home Purchase Credit from 2022, 118.05(3)
- \$10,000 maximum annual TFSA contribution for 2015, 207.01(1)“TFSA dollar limit”(c)
- \$10,000 maximum expenses for home accessibility tax credit until 2021, 118.041(3)B(a)
- \$10,000 maximum income of non-resident (NR) employee in Canada not needing information return by NR employer, Reg. 200(1.1)
- \$10,000 maximum RRSP withdrawal per year for Lifelong Learning Plan, 146.02(1)“eligible amount”(c), Reg. 104.1(1)(c)
- \$10,000 minimum advisor/promoter penalty for missing mandatory disclosure, 237.3(8)(b)(ii), 237.4(8)(b)(ii)
- \$10,000 minimum fine on summary conviction for using, possessing, making or selling zipper software or hardware, 239.1(2)
- \$10,000 over which capital addition to building owned since 1971 by credit union deemed separate building, ITAR 58(1)(c)(i)
- \$10,000 penalty for making or selling zipper software or hardware, 163.3(4)(a)
- \$10,000 per new child care space for investment tax credit, 127(9)“child care space amount”(a)
- \$10,000 per year minimum income to qualify for training credit, 122.91(2)(a)(i)B(A)(III)
- \$10,000 revenue over which non-profit organization must file information return, 149(12)
- \$10,000 tax-free payment by employer to spouse on death, 248(1)“death benefit”
- \$10,000 threshold for recoverable contribution to non-resident trust, 94(7)(a)(II)(A), 94(7)(b)
- \$10,000 threshold for reporting electronic funds transfers, 244.2(1), 244.4(1)
- \$10,000 threshold for specified disability savings plan, 146.4(1.2)(b)
- \$10,000 value of individual asset required to be reported on emigration, 128.1(10)“reportable property”(d)
- \$11,000 child care expenses for disabled child, 63(3)“annual child care expense amount”(a)
- \$11,500 denominator for reduced small business deduction for large corporations, 125(5.1)(a)
- \$12,000 maximum federal tax at issue for Tax Court of Canada informal procedure before June 26/13, *Tax Court of Canada Act* s. 18(1)(a)
- \$12,000 maximum penalty for failure to provide foreign-based information, 162(10)
- \$14,500 exemption from security required for departure tax, 220(4.51)
- \$15,000 athlete/entertainer income of Canadian resident from U.S. or U.S. resident from Canada not taxable, Canada-U.S. Tax Treaty:Art. XVI:1
- \$15,000 basis for additional CCA for grain-drying machinery, Reg. 1100(1)(sb)(iv)(B)
- \$15,000 cutoff for lump sum payment, withholding requirements, Reg. 103(4)(b), (c)
- \$15,000 exempt reimbursement for housing loss on relocation, 6(20)(a)
- \$15,000 maximum annual disability supports deduction for student, 64(b)(ii)(A)
- \$15,000 maximum contributions to eligible funeral arrangement for funeral services, 148.1(1)“eligible funeral arrangement”(b)(i)
- \$15,000 maximum late filing penalty, 66(12.75)
- \$15,000 threshold for withholding rate on RDSP disability assistance payment, Reg. 103.1(2)C(b), (c)
- \$15,500 pension adjustment limitation, Reg. 8509(12)(a)(ii)
- \$17,500 maximum restricted farm loss deduction, 31(1)(a)(ii)
- \$20,000 automobile cost cap (purchased June 18/87–Aug. 31/89), 13(2), 13(7)(g), (h), 20(4), (16.1), 67.2–67.4, 85(1)(e.4), Reg. 1101(1af), Reg. Sch. II:Cl. 10.1
- \$20,000 limit in year of death for attendant care credit for disabled person, 118.2(2)(b.1)
- \$20,000 maximum contributions to eligible funeral arrangement for cemetery care, 148.1(1)“eligible funeral arrangement”(b)(ii)
- \$20,000 maximum expenses for home accessibility tax credit from 2022, 118.041(3)B(a)
- \$20,000 maximum RRSP withdrawal for Home Buyers’ Plan before 2009, 146.01(1)“regular eligible amount”(h), 146.01(1)“supplemental eligible amount”(g)
- \$20,000 maximum RRSP withdrawal for Lifelong Learning Plan, 146.02(1)“eligible amount”(d), Reg. 104.1(1)(d)
- \$23,529 maximum base for leasing costs of automobile (before indexing), 67.3(d)
- \$24,000 basic annual ITC limit for individuals, 127(9)“annual investment tax credit limit”

- Dollar amounts in legislation and regulations (*cont'd*)
- \$24,000 maximum loss at issue for Tax Court of Canada informal procedure before June 26/13, *Tax Court of Canada Act* s. 18(1)(b)
 - \$24,000 maximum penalty for failure to provide foreign-based information after demand, 162(10)
 - \$24,000 minimum penalty for false statement in returns re transactions with non-residents and foreign properties, 163(2.4)
 - \$24,000 per partner maximum penalty for failing to file partnership information return, 162(8)
 - \$25,000 below which arm's length investment in small business permitted by RRSP, Reg. 4901(2) "connected shareholder"
 - \$25,000 below which leasing property rules do not apply, Reg. 1100(1.11)(c), 1100(1.13)(c), 1100(1.14), 8200(b)
 - \$25,000 charity false-statement penalty threshold for mandatory suspension of receipting privilege, 188.2(1)(c)
 - \$25,000 home relocation loan, interest deduction equivalent to before 2018, 110(1)(j)
 - \$25,000 maximum 10% wage subsidy for COVID-19 in 2020, Reg. 111
 - \$25,000 maximum federal tax at issue for Tax Court of Canada informal procedure, *Tax Court of Canada Act* s. 18(1)(a)
 - \$25,000 maximum fine for offence, 238(1)(a)
 - \$25,000 maximum investment in small business by specified shareholder's RRSP, Reg. 4901(2) "designated shareholder" (a)
 - \$25,000 maximum RRSP withdrawal for Home Buyers' Plan before March 20/19, 146.01(1) "regular eligible amount" (h), 146.01(1) "supplemental eligible amount" (g)
 - \$25,000 minimum farming expenses to qualify for carbon tax refund, 127.42(1) "eligible farming expenses" A(a)
 - \$25,000 minimum investment assets for charitable foundation disbursement requirement, 149.1(1) "disbursement quota" B(a)(ii)
 - \$25,000 minimum property value for interest deduction restrictions, 18.2(1) "excluded lease" (c)(i)
 - \$25,000 monthly employer withholdings, remittance dates, Reg. 108(1.1)(a)
 - \$25,000 penalty cap for missing mandatory disclosure, 237.3(8)(a)(ii)(A), 237.4(8)(a)(ii)(A)
 - \$25,000 value for total assets required to be reported on emigration, 128.1(9)
 - \$30,000 automobile cost cap for 2001–2021, 13(2), 13(7)(g), (h), 20(4), (16.1), 67.2–67.4, 85(1)(e.4), Reg. 1101(1af), 7307(1), Reg. Sch. II:Cl. 10.1
 - \$30,000 threshold for phase-out of Canada Child Benefit, 122.61(1)A:Q(a)
 - \$34,000 automobile cost cap for 2022, 13(2), 13(7)(g), (h), 20(4), (16.1), 67.2–67.4, 85(1)(e.4), Reg. 1101(1af), 7307(1), Reg. Sch. II:Cl. 10.1
 - \$35,000 maximum contributions to eligible funeral arrangement, 148.1(1) "eligible funeral arrangement" (b)(iii)
 - \$35,000 maximum RRSP withdrawal for Home Buyers' Plan after March 19/19, 146.01(1) "regular eligible amount" (h), 146.01(1) "supplemental eligible amount" (g)
 - \$35,294 maximum base for leasing costs of automobile 2001–21, 67.3(d)
 - \$40,000 basic exemption from minimum tax, 127.53
 - \$40,000 income threshold for debt forgiveness reserve, 61.2:C
 - \$50,000 cost of building, separate CCA class for, Reg. 1101(1ac), (1ad), (5b)
 - \$50,000 financial institution account threshold for reporting for US FATCA, Canada-US ETIEA Annex I:II(A), III(A)
 - \$50,000 max expenditures for air quality improvement credit, 127.43(1) "total ventilation expense" (b)
 - \$50,000 maximum accumulated income payment from RESP, no withholding, Reg. 100(1) "remuneration" (n)(iii)
 - \$50,000 maximum assets, trust not required to file return if no income, 150(1.2)(b)
 - \$50,000 maximum loss at issue for Tax Court of Canada informal procedure, *Tax Court of Canada Act* s. 18(1)(b)
 - \$50,000 maximum RESP contributions per beneficiary, 204.9(1) "excess amount" (b), 204.9(1) "RESP lifetime limit" (c)
 - \$50,000 minimum fine on indictment for using, possessing, making or selling zapper software or hardware, 239.1(3)
 - \$50,000 monthly employer withholdings, requirement to remit through financial institution or early, 153(1) closing words, 153(1.4), Reg. 110
 - \$50,000 penalty for second infraction using or possessing zapper software or hardware, 163.3(2)(b), (3)(b), (4)(b)
 - \$50,000 top-bracket income exemption for security required for departure tax, 220(4.51)(a)
 - \$50,000 USD thresholds for certain reporting of non-residents' accounts, 270(1) "broad participation retirement fund" (c)(iv)(B), 270(1) "excluded account" (a)(v), (b)(iv), (f)(ii), 270(1) "qualified credit card issuer" (b); Canada-US ETIEA Annex I, II(A)(1), II(A)(4), III(A)(1)
 - \$55,000 per year maximum salary per employee for journalism labour credit, 125.6(1) "qualifying labour expenditure" (a)
 - \$55,000 zero-emission automobile cost cap, 13(7)(i), Reg. 7307(1.1)
 - \$65,000 threshold for slower phase-out of Canada Child Benefit, 122.61(1)A:Q(a)
 - \$75,000 rent expense limit for COVID-19 Canada Emergency Rent Subsidy, 125.7(1) "qualifying rent expense" A
 - \$100,000 capital gain exempt from security required for departure tax, 220(4.51)(a)
 - \$100,000 capital gains exemption, 110.6(3)
 - \$100,000 foreign assets, reporting requirement, 233.3(1) "reporting entity"
 - \$100,000 maximum cost of addition to pre-1979 building, Reg. Sch. II:Cl. 6(k)
 - \$100,000 minimum cost for accredited film/video production episode under 30 minutes, Reg. 9300(1)(b)(i)
 - \$100,000 minimum investment assets for charitable organization disbursement requirement, 149.1(1) "disbursement quota" B(a)(i)
 - \$100,000 minimum penalty for s. 160 avoidance planning, 160.01(2)(b)
 - \$100,000 monthly employer withholdings, remittance dates, Reg. 108(1.1)(a)
 - \$100,000 of shares is material for private foundation, 149.1(1) "material transaction" (a), 149.2(1)(a)(ii)
 - \$100,000 or more cost of automobile or airplane, *see* Luxury Items Tax
 - \$100,000 penalty cap for large corp missing mandatory disclosure, 237.3(8)(a)(i)(A), (b)(iii), 237.4(8)(a)(i)(A), (b)(iii), 237.5(5)
 - \$100,000 penalty for second infraction making or selling zapper software or hardware, 163.3(4)(c)
 - \$100,000 plus gross compensation, maximum civil penalty, 163.2(5)(b)(ii)
 - \$150,000 limit for advanced life deferred annuity for 2020, 205(1) "ALDA dollar limit"
 - \$200,000 active business income limit for small manufacturers' M&P calculation, Reg. 5201(b)
 - \$200,000 assets over which non-profit organization must file information return, 149(12)
 - \$200,000 limit to non-CCPC stock option grants, 110(1.31)A
 - \$200,000 maximum taxable income for extra R&D credit, 127(9) "super-allowance benefit amount" C(b)(ii)
 - \$200,000 minimum cost for accredited film/video production episode at least 30 minutes, Reg. 9300(1)(b)(ii)
 - \$250,000 minimum interest and financing expenses for interest deduction restrictions, 18.2(1) "excluded entity" (b)
 - \$250,000 or more cost of boat, *see* Luxury Items Tax
 - \$250,000 USD threshold for reporting pre-existing non-residents' accounts, 275
 - \$300,000 rent expense limit for COVID-19 Canada Emergency Rent Subsidy Sept. 27/20 to Oct. 23/21, 125.7(2.1)A:D(b)E.1(i)
 - \$400,000 taxable income threshold for small CCPC quarterly instalments, 157(1.2)(a)
 - \$500,000 capital gains deduction for farming/fishing property, 110.6(2.2)(a)
 - \$500,000 dividend allowance for Part VI.1 tax (preferred share dividends), 191.1(2)(a), 191.1(4)(a)

Index

Dollar amounts in legislation and regulations (*cont'd*)

- \$500,000 exemption from earnings subject to branch tax, Canada–U.S. tax treaty Canada–U.S. Tax Treaty:Art. X:6(d)
- \$500,000 income limit for enhanced R&D investment tax credit, 127(10.2)
- \$500,000 maximum consideration received by non-resident trust before certain rules apply, 94(2)(s)(vi)(C)
- \$500,000 maximum cost of addition to pre-1988 building, Reg. Sch. II:Cl. 3(k)(iv)
- \$500,000 maximum fine on summary conviction for using, possessing, making or selling zipper software or hardware, 239.1(2)
- \$500,000 small business deduction threshold, 125(2)–(4), 125(7)“specified partnership income”M(i)
- \$500,000 threshold amount of annual sales affecting GST input tax credit timing, 248(16)(a)(i)(B)(I), 248(16)(a)(ii)(B)
- \$500,000 threshold amount of annual sales affecting QST input tax refund, 248(16.1)(a)(i)(B)(I), 248(16)(a)(ii)(B)
- \$1,000,000 base level deduction for principal-business corporation, 18(2.2)–(2.4)
- \$1,000,000 Canadian development expenses renounced to flow-through shareholder as Canadian exploration expenses before 2019, 66(12.602)(c)
- \$1,000,000 capital gains exemption for farming/fishing property, 110.6(2.2)(a)
- \$1,000,000 financial institution account threshold for reporting for US FATCA, Canada-US ETIEA Annex I:II(B), IV(B)
- \$1,000,000 maximum fine on indictment for using, possessing, making or selling zipper software or hardware, 239.1(3)
- \$1,000,000 minimum cost for accredited film/video production, Reg. 9300(1)(a)
- \$1,000,000 over which office and computer equipment is not “exempt property”, Reg. 1100(1.13)(a)(i), (i.1)
- \$1,000,000 previous year’s dividends paid on taxable preferred shares reduces dividend allowance, 191.1(2)(b), 191.1(4)(b)
- \$1,000,000 rent expense limit for COVID-19 Canada Emergency Rent Subsidy Oct. 24/21 to May 7/22, 125.7(2.1)A:D(b)E.1(ii)
- \$1,000,000 threshold of transactions with related non-residents for reporting requirements, 233.1(4)
- \$1,000,000 USD maximum annual lifetime contributions to retirement fund (re reporting of non-residents’ accounts), 270(1)“excluded account”(a)(v)
- \$1,000,000 USD threshold for certain reporting of non-residents’ accounts, 270(1)“high value account”, “lower value account”, 275(4)(b)(iii)(A), 277(6)(c)
- \$1,050,000 maximum fully refundable R&D investment tax credit since Feb. 26/08, 127(10.2)
- \$1,500,000 limit for CCA immediate expensing 2021–2024, Reg. 1104(3.2)
- \$2,000,000 expenditure limit for higher investment tax credit before Feb. 26/08, 127(10.2)–(10.4)
- \$3,000,000 expenditure limit for higher investment tax credit, 127(10.2)–(10.4)
- \$5,000,000 expected drilling expenses for well, 66.1(6)“Canadian exploration expense”(d)(iv)(A)
- \$5,000,000 gross revenue threshold for calculating transfer pricing penalty, 247(3)(b)(ii)
- \$5,000,000 maximum cost of segregated fund, exclusion from financial institution rules, Reg. 9000(c)(iii)
- \$10,000,000 capital deduction for large corporations for certain purposes, 181.5(1.1), (4.1)
- \$10,000,000 cost of pipeline, election for separate class, Reg. 1101(5i)
- \$10,000,000 excess value for CWB trust, 135.2(1)“Canadian Wheat Board continuance”(c), 135.2(1)“eligible unit”(a)
- \$10,000,000 maximum investment in corporation to be “small business security” for qualified investments, Reg. 5100(2)(e)
- \$10,000,000 minimum outstanding bonds for corporate bonds to be qualified investments, Reg. 4900(1)(i)(iii)
- \$10,000,000 taxable capital employed in Canada, 225.1(8)
- \$10,000,000 taxable capital employed in Canada to be large corporation, 225.1(8)
- \$10,000,000 taxable capital in Canada threshold for reduced small business deduction, 125(5.1)(a)
- \$10,000,000 taxable capital phase-out start for enhanced R&D investment tax credit, 127(10.2)
- \$10,000,000 taxable capital threshold for small CCPC quarterly instalments, 157(1.2)(a)
- \$15,000,000 maximum investment for one corporation by LSVCC, 204.8(1)“eligible investment”(e)
- \$15,000,000 maximum taxable capital employed in Canada for corp to qualify for air quality improvement credit, 127.43(1)“qualifying corporation”(b)
- \$15,000,000 maximum taxable capital of corp that renounces CDE to flow-through shareholder as CEE before 2019, 66(12.601)(a.1)
- \$15,000,000 minimum taxable capital for interest deduction restrictions, 18.2(1)“excluded entity”(a)
- \$15,000,000 taxable capital threshold for eliminating small business deduction before 2022, 125(5.1)(a) [$\$5,000,000 \times 0.00225 = \$11,250$]
- \$25,000,000 debt issuance to qualify for RRSP etc. investment, 204“qualified investment”(c.1)(ii)
- \$25,000,000 minimum corporate capital for bonds to be qualified investments, Reg. 4900(1)(i)(iii)
- \$50,000,000 asset limit for corporation to be “small business security” for qualified investments, Reg. 5100(2)(f)
- \$50,000,000 asset limit for eligible business entity for LSVCC, 204.8(1)“eligible investment”(f)(i)
- \$50,000,000 asset limit for qualified small business corporation (share not mark-to-market property), Reg. 9001(1)(c)
- \$50,000,000 corporate assets threshold for high penalties for missing mandatory disclosure, 237.3(8)(a)(i), 237.4(8)(a)(i)
- \$50,000,000 maximum carrying value of small business corporation for capital gain rollover, 44.1(1)“eligible small business corporation share”(b)
- \$50,000,000 taxable capital phase-out limit for enhanced R&D investment tax credit since Feb. 26/08, 127(10.2)
- \$50,000,000 taxable capital threshold for eliminating small business deduction from 2022, 125(5.1)(a)
- \$200,000,000 basic capital deduction for financial institutions capital tax, 190.15
- \$220,000,000 maximum capital deduction for financial institutions capital tax, 190.15
- \$500,000,000 minimum revenue for stock option limit rules to apply, 110(0.1)“specified person”(b), (c)
- €750,000,000 (Euros), threshold for country-by-country reporting, 233.8(1)“excluded MNE group”
- \$1,000,000,000 annual value of shares traded for exchange (re reporting of non-residents’ accounts), 270(1)“established securities market”(b)
- \$1,000,000,000 capital deduction for Part VI tax, 190.15(1)–(3)
- \$2,000,000,000 equity for offshore regulated banks FAPI exception, 95(2.11)(b)(i)

Domicile, *see* Residence

Donations, *see* Gifts and donations (charitable); Gratuities

Donor bank

- sperm costs, medical expense credit, 118.2(2)(v)

Double counting of deductions or credits, 248(28)

Double dipping allowed

- home accessibility tax credit and medical expense credit, 118.041(4)
- donation credit and tax-free capital gain, 38(a.1), (a.2), 39(1)(a)(i.1)

Double jeopardy, 238(3), 239(3)

Double tax, elimination of

- generally, 248(28)
- imposed by both Canada and foreign country
 - foreign tax credit, 126
 - treaty relief, Canada–U.S. Tax Treaty:Art. XXIV; Canada–U.K. Tax Treaty:Art. 21

Doubtful debts

- reserve for, 12(1)(d), (l)

Dow Jones Industrial Average units

- qualified investments for deferred income plans, Reg. 4900(1)(n.1)

Downsizing, Reg. 8505

- pension benefits, Reg. 8308(9)
- program, defined, Reg. 8505(1)
- suspension or cessation of pension, Reg. 8503(8)

Dragon Dictate software

- disability supports deduction, 64(a)A(ii)(G)
- medical expense credit, 118.2(2)(1.42)

Dramatic work, copyright royalties

- no withholding tax, 212(1)(b)(vi), 212(9)(b)

Dressing oneself

- defined, 118.4(1)(f)
- impairment with respect to
 - certification by occupational therapist or physician
 - for disability credit, 118.3(1)(a.2)(iv)
 - eligibility for disability credit, 118.4(1)(c)(ii.1)

Drilling or exploration expense

- defined, 66(15)

Drilling rights, *see* Exploration and drilling rights**Drinks**, *see* Food**Drive-in theatre, property acquired for**

- capital cost allowance, Reg. Sch. II:Cl. 10(q)

Driver's licence

- change of address, deduction for, 62(3)(h)

Driveway alterations

- medical expense credit, 118.2(2)(1.6)

Drought or flood region

- prescribed regions, Reg. 7305.01(1)
- sales of breeding bees in
 - deferral of income from, 80.3(4.1)
- sales of breeding livestock in
 - deferral of income from, 80.3(4)
 - exceptions, 80.3(6)
 - inclusion of deferred amount, 80.3(5)
 - amalgamation, on, 87(2)(tt)

Drug plan, *see* Private health services plan**Drugs**

- charitable donation from inventory, additional deduction before 2017, 110.1(1)(a.1), (8)
- medical expense credit, 118.2(2)(n), (s), Reg. 5701
 - behind-the-counter drugs, Reg. 5701
 - Special Access Programme, 118.2(2)(s)

Due dates, *see* Deadlines**Due diligence**

- defence to directors' liability, 227.1(3)
- defence to foreign reporting requirements, 233.5
- obligation on financial institution re accounts to be reported to foreign tax authorities, 272–277
- obligation on financial institution re accounts to be reported to US Internal Revenue Service, 265(2), (3)
- obligation on issuer, carrier or promoter of RRSP, RRIF, TFSA, RESP or RDSP, 207.01(5)

Dues

- not deductible, 8(5)
- professional, union, etc., deduction for, 8(1)(i)
- recreational club, etc., not deductible, 18(1)(I)(ii)

Dumping, *see* Anti-dumping duties or countervailing duties; Foreign affiliate dumping**Durable goods, for teacher school-supplies credit**, Reg. 9600**Duties**

- anti-dumping or countervailing, *see* Anti-dumping duties or countervailing duties

Duty-free stores relief (COVID), Reg. 8901.1(2)(b)(xiii), *see also* Qualifying tourism or hospitality entity**Dwelling**, *see* Home**E****EBITDA [Earnings before interest, taxes, depreciation and amortization]**, *see* Excessive interest and financing expenses limitation (EIFEL)**EBP**, *see* Employee benefit plan**EBRD**, *see* European Bank for Reconstruction and Development**ECE**, *see* Eligible capital expenditure**ECP**, *see* Eligible capital property (pre-2017)**ECRA**, *see* Executive compensation repayment amount**EEDD**, *see* Excessive eligible dividend designation**EFILE**, *see* Electronic filing**EFT**, *see* Exempt foreign trust**EGE**, *see* Eligible group entity**EHLT**, *see* Employee life and health trust**EI**, *see* Employment insurance**EIFEL**, *see* Excessive interest and financing expenses limitation (EIFEL)**ELHT**, *see* Employee life and health trust**EMDP**, *see* Eligible mine development property**EOSMDE**, *see* Eligible oil sands mine development expense**EPOP**, *see* Eligible person or partnership**ERDTH**, *see* Eligible refundable dividend tax on hand**ESS (Electronic suppression of sales) device**, *see* Zapper software (or hardware)**ETF**, *see* Exchange-traded fund**Earned depletion allowances**

- computation, Reg. 1201
- deduction from income, 65

Earned depletion base

- capital costs of depreciable property, added to
 - proceeds of later disposition, 59(3.3)(b)
- computation, Reg. 1202, 1205
- expenses added to
 - amounts receivable, portion included in income, 59(3.3)(a)

Earned income

- for Canada Child Benefit, 63(3)“earned income”, 122.6
- for child care expenses, 63(3)“earned income”
- for RRSP purposes, defined, 146(1)“earned income”
- for refundable medical expense credit, 122.51(1)“eligible individual”(c)
- for training credit, 122.91(2)(a)(i)B(A)(III)

Earnings (of foreign affiliate)

- defined, Reg. 5907(1)

Earnings supplement, *see* Social assistance payment: supplementing employment income**Earnout agreement**

- payments taxable, 12(1)(g)
- payments to non-resident, 212(1)(b) (closing words)

Earthquake reserves

- insurers, Reg. 1400(3)L

Easement

- ecologically sensitive land, value when donated, 110.1(5), 118.1(12)
 - valuation applies for capital gains purposes, 43(2)

Ecological gifts

- by corporation, 110.1(1)(d)
- by individual, 118.1(1)“total ecological gifts”
- determination of value by Minister of Environment, 118.1(10.1)–(10.5)
 - appeal to Tax Court of Canada, 169(1.1)
 - reassessment, 118.1(11)
- easement, servitude or covenant, valuation, 110.1(5), 118.1(12)
- valuation applies for capital gains purposes, 43(2)
- fair market value, certificate of, 118.1(10.5)

- Ecological gifts (*cont'd*)
- reduced capital gain inclusion, 38(a.2)
 - tax if donee disposes of the property, 207.31
- Ecologically sensitive land**, *see* Ecological gifts
- Economic profit**
- defined, for foreign tax credit, 126(7)
 - none, limitation on foreign tax credit, 126(4.1)
- Economic zone**, *see* Exclusive economic zone
- Edition (of periodical)**
- meaning of, 19.01(6)
- Education assistance**
- provided by employer to employee's relative, whether taxable, 6(1)(a)(vi)
- Education credit (pre-2017)**, 118.6, *see also* Lifelong Learning Plan; Student loan; Tuition fees: credit for
- Education savings plan**, 146.1, *see also* Registered education savings plan
- appeal from refusal to register, 172(3)(e), 180
 - conditions, 146.1(2)
 - defined, 146.1(1) "education savings plan"
 - payment out of
 - registered plan, 56(1)(q), 146.1(7)
 - registration of, 146.1(2), (4)
 - conditions, 146.1(2)
 - deemed, 146.1(3)
 - refusal by Minister
 - deemed, 172(4)(d)
- Educational assistance payment**
- defined, 146.1(1)
 - from registered plan, taxable, 56(1)(q), 146.1(7)
 - limitations on, 146.1(2)(g), (g.1)
 - payable until 6 months after student ceases to be enrolled, 146.1(2.21), (2.22)
- Educational institution**
- certification by Human Resources Development Canada, 118.5(1)(a)(ii), 118.6(1) "designated educational institution" (a)(ii)
 - designated, defined, 118.6(1)
 - required to issue tuition fees certificate, Reg. 203
- Educational program**
- qualifying, defined, 118.6(1)
- Educators' credit**, *see* Teacher school-supplies credit
- Egypt**, *see also* Foreign government; Little Egypt bump
- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(d) [repealed]
- Elected functional currency**
- defined, for functional currency rules, 261(1)
- Elected property**
- defined, for CCA separate-class rules for licences, Reg. 1101(1ag)
- Electing beneficiary (for qualified disability trust)**
- defined, 122(3)
- Electing contributor (to trust)**
- defined, 94(1)
 - election to limit liability for non-resident trust's tax, 94(16)
 - liability for joint contribution to trust, 94(17)
- Electing trust (for non-resident trust rules)**
- defined, 94(1)
 - rules for, 94(3)(f)
- Election**, *see also* Rollover
- amounts receivable at date of death, 70(2)
 - revocation of, 70(4)
 - assets acquired from foreign affiliate, 80.1(4)–(6)
 - basic herd, reduction of, 29(1)
 - beneficiary, by, re single payment from DPSP, Reg. 1503
 - beneficiary of non-resident trust, by, 107(2.002)
 - branch tax, Reg. 2403
 - CCPC, not to be for purposes of dividend tax credit, 125(7) "Canadian-controlled private corporation" (d)
 - Canadian development expenses of partnership, exclusion of, 66.2(5) "Canadian development expense" (f)
 - Canadian oil and gas property expenses of partnership, exclusion of, 66.4(5) "Canadian oil and gas property expense" (b)
 - capital cost allowance
 - inclusions, Reg. 1103
 - separate class for certain equipment, Reg. 1101(5q), (5t)
 - transfers between classes, Reg. 1103
 - capital dividend, re, 83(2)–(4)
 - excessive, tax on, 184
 - capital gains dividend, re
 - investment corporation, 131(1), Reg. 2104
 - mortgage investment corporation, 130.1(4), Reg. 2104.1
 - excessive, tax on, 184
 - mutual fund corporation, 131(1), Reg. 2104
 - excessive, tax on, 184
 - capital gains exemption
 - farm or fishing property, 110.6(2)
 - gains to Feb. 22/94, 110.6(3), (19)–(30), *see also* Capital gains deduction: election to trigger gain
 - small business shares, 110.6(2.1)
 - when corporation going public, 48.1
 - capital interest distribution by personal trust or prescribed trust, 107(2)
 - capitalization of interest, 21
 - carryback or carryforward, *see* Carryback; Carryforward
 - cash method (farming or fishing business), 28(1)
 - ceasing to be resident, on, 128.1(4)(d), Reg. 1300–1302
 - on returning to Canada, 128.1(6)(a), (c), 128.1(7)(d), (g)
 - postponement of departure tax by posting security, 220(4.5)–(4.54)
 - change in use of property, 45(2)
 - communal organization, re taxable income, 143(2), (3)
 - corporation and partners re property transferred, 85(1), (2)
 - corporation and shareholder, re property transferred
 - eligible property, 85(1.1)
 - cost of capital property where change in control of corporation, 111(4)(e)
 - Crown corporation, to remain taxable, 149(1.11)
 - currency to use other than Canadian dollar, 261(3)
 - death of taxpayer, 70(6.2), Reg. Part X
 - debt settled on windup of subsidiary into parent, 80.01(4)
 - deemed capital loss on partnership interest, 40(3.12)
 - deemed disposition of bad debt or share of insolvent corporation, 50(1)
 - deemed disposition of capital property on change of control, 111(4)(e)
 - deferral of "departure tax" payment, 220(4.5)–(4.54), Reg. 1301
 - departure tax, *see* taxpayer ceasing to be resident (*below*)
 - derivatives, mark-to-market treatment, 10.1
 - disposition of Canadian securities, 39(4)
 - disposition of share in foreign affiliate, 93(1), (1.1), (1.11)
 - disposition of vessel, 13(16)
 - eligible non-residential building, Reg. 1101(5b.1)
 - emigration that is temporary, ignored, 128.1(6)(a), (c), 128.1(7)(d), (g)
 - employees profit sharing plan, Reg. 1500
 - excessive, re dividend
 - treatment of excess as separate dividend, 184(3), Reg. 2106
 - executor, by, to carry back losses to year of death, 164(6)
 - expropriation assets, re, 80.1(1), Reg. 4500
 - fiscal period, non-calendar year, 249.1(4)
 - fiscal period of terminated partnership, 99(2)–(4)
 - fishermen, tax deduction, Reg. 105.1
 - foreign trust reporting, 233.2(5)
 - forward averaging, 110.4(2) [repealed]

Election (*cont'd*)

- • revocation, 110.4(6.1) [repealed]
 - functional currency other than Canadian dollar, 261(3)
 - gifts by communal organizations, allocated to members, 143(3.1)
 - inducement, where offset by expense, 12(2.2)
 - insurer
 - • non-resident, 219(5.2)
 - interest on expropriation assets, 80.1(2)
 - investment tax credit, renunciation by general partner, 127(8.4)
 - involuntary dispositions, 13(4)
 - joint exploration corporation, 66(10)–(10.4)
 - late, 220(3.2)–(3.7); Reg. 600
 - leasing properties, in respect of, 16.1(1)
 - legal representative of deceased taxpayer, *see also* Legal representative of deceased taxpayer
 - manufacturing and processing property, Reg. 1102(16.1)
 - mark-to-market treatment of derivatives, 10.1
 - mortgage investment corporation, re capital gains dividend, 130.1(4)
 - • where not made, 130.1(4.1)
 - mutual fund corporation, re dividend, 131(1)–(1.4)
 - mutual fund reorganization, 132.2(1)“qualifying exchange”(c)
 - mutual fund trust status from beginning of first year, 132(6.1)
 - non-resident, to file return under Part I, 216(1), 217
 - • restriction on deduction, 216(8)
 - non-resident parent corporation, re interest on loan, 218(3), (4)
 - Part II of former Act, under, ITAR 66
 - Part VI.1 tax, to pay, 191.2
 - partners, by
 - • re property transferred, 97(2)
 - • validity of, 96(3)
 - partnership ceasing to exist
 - • rules applicable, 98(3), (4)
 - partnership’s Canadian development expenses, 66.2(5)“Canadian development expense”(f)
 - partnership’s Canadian oil and gas property expenses, 66.4(5)“Canadian oil and gas property expense”(b)
 - personal injury award, 81(5)
 - personal representative, by, to carry back losses to year of death, 164(6)
 - post-emigration loss, 128.1(8)
 - postponement of departure tax by posting security, 220(4.5)–(4.54)
 - postponement of tax on distribution of property by trust to non-resident beneficiary, by posting security, 220(4.6)–(4.63)
 - preferred beneficiary, of trust, 104(12), 104(14), Reg. 2800
 - principal residence, 45(3)
 - • distribution by spousal trust, 107(2.01)
 - • where not available, 45(4)
 - property owned on Dec. 31/71, ITAR 26(7)
 - proportional holdings in trust property, 259(2)
 - proprietor, on disposing of business, 25
 - public corporation, to be, ITAR 50(2)
 - qualifying dividend
 - • late-filed, 83(3)–(5)
 - replacement property, 13(4), 44(5)
 - representation expense, 20(9)
 - research and development, 37(8)(a)(ii)(B), 37(10)
 - reserves for year of death, 72(2)
 - retirement compensation arrangement
 - • refundable tax, 207.5(2)
 - revocation of, *see* Revocation of elections
 - rights or things on death, re, 70(2)
 - • revocation of, 70(4)
 - RPP contribution
 - • additional voluntary contributions, 8(1.1)
 - sale of accounts receivable, 22
 - scientific research, 37(8)(a)(ii)(B), 37(10)
 - • scientific research tax credit, re first holder of share, 127.3(9)
 - segregated fund trusts, Reg. 6100
 - services not rendered, 20(24), (25)
 - specified leasing property not to be exempt property, Reg. 1100(1.14)
 - spousal attribution rule on emigration, 74.2(3)
 - stock option
 - • by employer to forgo deduction for cash payment, 110(1.1), (1.2)
 - subsec. 26(7) of ITAR, under, Reg. 4700
 - surpluses, re, Reg. Part XXI
 - taxpayer ceasing to be resident
 - • deferral of capital gains, 128.1(4)(d), Reg. 1300–1302
 - • deferral of payment of taxes, 220(4.5)–(4.6)
 - • realization of capital gains, 128.1(4)(d), Reg. 1302
 - time of acquisition of control, re, 256(9)
 - transfer of property to corporation
 - • partnership, from, 85(2), (6)–(9)
 - • • partnership wound up, 85(3)
 - • shareholder, by, 85(1), (6)–(9)
 - • • eligible property, 85(1.1)
 - treat bovine animal as specified animal, 28(1.2)
 - treat dividend as capital dividend, to, 83(2.2)–(2.4)
 - • where not available, 83(2.1)
 - trigger capital gain on small business corporation share, 48.1
 - trust, by
 - • accumulating income, 104(12), 104(14), Reg. 2800
 - • capital distribution, no rollover, 107(2.001)
 - • gains not distributed to beneficiaries, 107(2.11), (2.12)
 - • preferred beneficiary, 104(12), 104(14), Reg. 2800
 - • V-day value, re, Reg. 4700
 - • withholding tax, 153(1)(n)
 - • to increase, 153(1.2), Reg. 109
 - work in progress of professional, exclusion of until 2017, 34
- Election expenses**
- contributions deductible, 127(3)–(4.2)
- Electric, gas or steam corporations**
- information returns, Reg. 213
- Electric car, *see* Zero-emission vehicle**
- Electric motor system technician**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Electric vehicle charging station**
- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xvii)
- Electrical advertising signs**
- capital cost allowance, Reg. Sch. II:Cl. 11
- Electrical energy, *see* Energy: electrical**
- Electrical energy storage property**
- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xviii)
- Electrical furnace**
- medical expense credit for, Reg. 5700(c.2)
- Electrical generating equipment**
- capital cost allowance, Reg. Sch. II:Cl. 1(k), Sch. II:Cl. 2(a), Sch. II:Cl. 8(g), Sch. II:Cl. 8(h), Sch. II:Cl. 9(e), Sch. II:Cl. 9(f), Sch. II:Cl. 17(a.1), Sch. II:Cl. 29, Sch. II:Cl. 41, Sch. II:Cl. 43.1, Sch. II:Cl. 43.2
 - electrical energy producer/distributor
 - • capital cost allowance, Reg. Sch. II:Cl. 1(m), Sch. II:Cl. 8(f), Sch. II:Cl. 9(a)
 - for mine
 - • capital cost allowance, Reg. 1102(8)–(9.2), Reg. Sch. II:Cl. 10(r), Sch. II:Cl. 41
- Electricity, *see* Energy: electrical**
- Electricity Support Program, *see* Ontario: Electricity Support Program**
- Electrolux-Husqvarna spinoff, Reg. 5600(c)**

Electronic cash register

- defined, for penalties re zapper software, ETA 285.01(1), 327.1(1)

Electronic communications equipment

- capital cost allowance, Reg. 1101(5p), Reg. Sch. II:Cl. 10(f)
- excluded from apprentice vehicle mechanics' deduction, 8(6)(b)(iv)
- excluded from tradesperson's tools deduction, 8(6.1)(d)

Electronic data processing equipment, *see* Computer**Electronic document**

- print-out as proof, 244(9)

Electronic filing

- E-FILE, 150.1
- information returns
 - emailing of T4, T4A, T5 or T2202, Reg. 209(5)
 - emailing of taxpayer portion with express consent, Reg. 209(3), (4)
 - mandatory, Reg. 205.1
 - optional, 244(22)
- mandatory
 - for certain corporations, 150.1(2.1), Reg. 205.1(2)
 - for certain tax preparers, 150.1(2.3), (2.4)
 - penalty (filing fee) for non-compliance, 162(7.3)
 - penalty for failing to file electronically, 162(7.2)
- proof of return filed, 244(21)
- tax returns, 150.1

Electronic funds transfer

- defined, 244.1
- reporting of international transfers of \$10,000 or more, 244.2(1)

Electronic mail

- information slips to taxpayers with express consent, Reg. 209(3), (4)
- T4 slips to employees, 221.01, Reg. 209(3), (5)

Electronic notice

- presumed sent and received, 244(14.1)
- Requirement for Information, to bank or credit union, 231.2(1.1), 231.6(3.1)
- proof of, 244(6.1)

Electronic payment

- defined, 160.5(1)
- required for payment to CRA over \$10,000, 160.5(2)

Electronic records

- requirement to maintain, 230(4.1)
- exemption, 230(4.2)

Electronic suppression of sales device

- defined, for penalties re zapper software, 163.3(1), 239.1(1)

Electronics technician (consumer products)

- apprenticeship job creation credit, 127(9)“investment tax credit”

Electrotherapy device

- medical expense credit, Reg. 5700(z.2)

Elevator

- for disabled, 20(1)(qq)
- grain, 76(4), (5)

Eligible adoption expense

- defined, 118.01(1)

Eligible alignment income

- defined (for corporate inclusion of partnership income), 34.2(1)

Eligible amount

- charitable donations
 - defined, 248(31), (41)
 - limits amount of donation credit, 110.1(1)(a), 118.1(1)“total charitable gifts”
- defined
 - for charitable or political donations, 248(31), (41)
 - where deemed nil for donation over \$5,000, 248(41)

- for foreign retirement arrangement, 60.01
- for Home Buyers' Plan, 146.01(1)
- for Lifelong Learning Plan, 146.02(1)
- for RRIF, 146.3(6.11)
- political contributions, 248(31)
- defined, 248(31), (41)
- limits amount of political credit, 127(3)

Eligible apprentice

- defined, 127(9)

Eligible apprentice mechanic

- deduction for tools, *see* Apprentice: mechanic
- defined, 8(6)(a)

Eligible bank affiliate

- defined, for FAPI, 90(15), 95(2.43)
- where facilitating trades for arm's length customers, 95(2.43)–(2.45)

Eligible business entity

- defined, 204.8(1)

Eligible Canadian bank

- defined, for FAPI, 90(15), 95(2.43)
- where facilitating trades for arm's length customers, 95(2.31), (3.01)

Eligible Canadian indebtedness

- defined, for FAPI of banks, 90(15), 95(2.43)

Eligible Canadian partnership

- defined, 80(1), 80.04(1)
- whether a “directed person”, 80(1)“directed person”

Eligible capital amount (before 2017), 14(1) [repealed]**Eligible capital expenditure**

- 2017 and later, *see* Goodwill
- before 2017, 14(5) [repealed]

Eligible capital property (pre-2017), 14 [repealed]; 20(1)(b) Notes

- 2017 and later, *see* Goodwill

Eligible child

- defined
 - for adoption expense credit, 118.01(1)
 - for child care expense deduction, 63(3)

Eligible child care space expenditure

- defined, 127(9)

Eligible controlled foreign affiliate

- defined, 95(4)

Eligible corporation

- for restrictive-covenant rules
 - defined, 56.4(1)
- for RRSP/RRIF small business investments
 - defined, Reg. 5100(1)
 - qualified investment in, Reg. 4900(6)(a)

Eligible currency hedge

- defined, for FAPI of banks, 95(2.43)

Eligible debt (of Canadian wheat board)

- defined, 135.2(1)

Eligible derivative

- defined, 10.1(4)
- effect of amalgamation, 87(2)(e.41), (e.42)
- effect of windup, 88(1)(i.1)
- election for mark-to-market treatment, 10.1(1)
 - no s. 85 rollover when election made, 85(1.12), 85(2)(a)
 - no 97(2) rollover when election made, 97(2)
- no mark-to-market treatment without election, 10.1(7)

Eligible distribution

- defined, for foreign spin-off, 86.1(2)

Eligible dividend

- defined, 89(1), 248(1)
- designation of, 89(14)
- dividend compensation payment deemed to be, 260(1.1), (5)

- Eligible dividend (*cont'd*)
- excessive, *see* Excessive eligible dividend designation
 - 45% gross-up, 82(1)(a.1), 82(1)(b)(ii)
 - late designation, 89(14.1)
 - partial, 89(1)“eligible dividend”(a)
- Eligible donee**
- for charity revocation tax
 - defined, 188(1.3)
 - transfer to, 188(1.1)B(c), 189(6.2)(b), 189(6.3)
 - for RCAA revocation tax
 - defined, 188(1.4)
- Eligible dwelling**
- defined
 - for home accessibility credit, 118.041(1)
- Eligible educator**
- defined, for teacher school-supplies credit, 122.9(1)
- Eligible employee**
- defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)
 - defined, for COVID-19 source deduction benefit, 153(1.03)
- Eligible employer**
- defined, for 2020 COVID-19 benefit, 153(1.03)
 - for COVID-19 Canada Emergency Wage Subsidy, *see* Eligible entity
- Eligible entity**
- defined
 - for air quality improvement credit, 127.43(1)
 - for COVID-19 Canada Emergency Wage Subsidy, 125.7(1), Reg. 8901.1
 - re residence of international shipping corporation, 250(6.04)
- Eligible family member**
- defined, for northern residents' deduction, 110.7(6)
- Eligible farming expenses**
- for carbon tax refund to farmers, 127.42(1)
- Eligible fiscal period**
- defined, 34.2(1)“eligible alignment income”(a), (b)
- Eligible funeral arrangement, 148.1**
- defined, 148.1(1), 248(1)
 - emigration of individual, no deemed disposition, 128.1(10)“excluded right or interest”(e)(iv)
 - excluded from various trust rules, 108(1)“trust”(e.1)
 - exemption for amount accruing in, 148.1(2)(a)
 - income inclusion on return of funds, 12(1)(z.4), 148.1(3)
 - information return, Reg. 202(2)(m)
 - payment to non-resident, Reg. 202(2)(m)
 - information return, Reg. 202(2)(m)
 - withholding tax, 212(1)(v)
 - payment to resident, Reg. 201(1)(f)
 - provision of funeral services under, 148.1(2)(b)(i)
 - rollover to new trust, 248(1)“disposition”(f)(vi)
- Eligible group corporation**
- defined, for interest deduction restrictions, 18.2(1)
- Eligible group entity**
- defined, for interest deduction restrictions, 18.2(1), (16)
 - transitivity deeming rule, 18.2(16)
- Eligible housing loss, *see* Housing loss: eligible**
- Eligible individual**
- defined
 - for Canada Child Benefit, 122.6, 122.62(1); Reg. 6301, 6302
 - for Canada Workers Benefit, 122.7(1)
 - for Climate Action Incentive, 122.8(1)
 - for GST credit, 122.5(1), (2)
 - for home accessibility tax credit, 118.041(1)
 - for refundable medical expense credit, 122.51(1)
 - for restrictive-covenant rules, 56.4(1)
 - for rollover to RDSP on death, 60.02(1)
- Eligible interest**
- defined
 - for residence of international shipping corporation, 250(6.04)
 - for restrictive covenant rules, 56.4(1)
- Eligible investment**
- defined, 204.8(1)
 - of financial institution, for capital tax
 - defined, 181.3(5), 190.14(2)
 - of labour-sponsored venture capital corporation
 - tax where insufficient, 204.82
 - refund of tax, 204.83
- Eligible labour body**
- defined, 204.8(1)
- Eligible landfill site**
- defined, Reg. 1104(13)
- Eligible liquefaction activities**
- income from, defined, Reg. 1100(18)
- Eligible liquefaction building**
- additional CCA, Reg. 1100(1)(a.3)
 - defined, Reg. 1104(2)
- Eligible liquefaction equipment**
- additional CCA, Reg. 1100(1)(yb)
 - defined, Reg. 1104(2)
- Eligible liquefaction facility**
- building for
 - CCA, Reg. 1100(1)(a.3), Sch. II:Cl. 1(q)
 - separate class, Reg. 1101(5b.2)
 - defined, Reg. 1104(2)
 - equipment for
 - CCA, Reg. 1100(1)(yb), Sch. II:Cl. 47
 - separate class, Reg. 1101(4i)
- Eligible medical gift (pre-2019), 110(1)(a.1), 110.1(8), (9)**
- Eligible member**
- defined, for agricultural cooperatives, 135.1(1)
- Eligible mine development property**
- defined, Reg. 1104(2)
 - inclusion in Class 41, Reg. Sch. II:Cl. 41.2 opening words
- Eligible newsroom employee**
- defined, for journalism labour credit, 125.6(1)
- Eligible non-residential building**
- addition or alteration to, rules for, Reg. 1102(23), (24)
 - additional allowance for, Reg. 1100(1)(a.1), (a.2)
 - manufacturing and processing, used for, Reg. 1100(1)(a.1)
 - defined, Reg. 1104(2)
 - separate CCA class, Reg. 1101(5b.1)
 - under construction on March 19, 2007, Reg. 1102(25)
- Eligible offset**
- application on rollout of property by trust, 107(2)(c)(ii), 107(2.1)(c)(iii)
 - excluded from disposition, 248(1)“disposition”(h)
 - defined, 108(1)
- Eligible oil sands mine development expense**
- defined, 66.1(6)
 - included in CEE, 66.1(6)“Canadian exploration expense”(g.2)(ii)
- Eligible PRPP withdrawal amount**
- defined, 60.022(4)
- Eligible pension income**
- defined
 - for non-refundable pension credit, 118(7)
 - for pension income splitting, 60.03(1)
- Eligible period**
- defined, for 2020 COVID-19 benefit, 153(1.03)

Eligible period of reduced pay

- counted as full pay for pension purposes, Reg. 8503(4)(a)(ii), 8504(4)(d)(i), 8507(3)(a), 8507(7)(b)
- defined, Reg. 8500(1)
- COVID-19 relief for 2020–22, Reg. 8500(1.3)
- sabbatical arrangement deemed to be eligible period, Reg. 8508(a)

Eligible period of temporary absence

- defined, Reg. 8500(1)

Eligible person or partnership

- defined, for immediate-expensing rules, Reg. 1104(3.1)

Eligible pooling arrangement

- defined, for small business investment capital gain rollover, 44.1(1)

Eligible portion (of corporation's gains or losses)

- defined, 129(4)

Eligible portion (of the specified amount)

- re royalty reimbursements, 80.2(11)

Eligible proceeds

- defined, for rollover to RDSP on death, 60.02(1)

Eligible production corporation

- defined, for film/video production services credit, 125.5(1)

Eligible property

- conversion of foreign bank affiliate to branch
- defined, 142.7(1)
- shareholder/corporation rollover, for, 85(1)
- defined, 85(1.1)
- limitation re real property of non-resident, 85(1.2)

Eligible RRIF withdrawal amount

- defined, 60.022(2)

Eligible relocation

- defined, 248(1)
- moving expenses deductible, 62

Eligible remuneration

- defined, for 2020 COVID-19 benefit, 153(1.03)
- defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)

Eligible resale property

- defined, for SIFT REIT rules, 122.1(1)
- gains from disposition of, 122.1(1)“real estate investment trust”(b)(vi)
- revenue from managing, 122.1(1)“qualified REIT property”(b)

Eligible refundable dividend tax on hand

- defined, 129(4)
- transitional determination for 2019, 129(5)
- on amalgamation, 129(5.1)
- refund of, 129(1)(a)(i)(B), 129(1)(a)(ii)(B)(I)2

Eligible salary and wages

- defined, 127(9), (11.4)

Eligible sewage treatment facility

- defined, Reg. 1104(13)

Eligible share (of Canadian Wheat Board)

- defined, 135.2(1)

Eligible small business corporation

- defined, for small business investment capital gain rollover, 44.1(1), (10)
- share
- defined, for small business investment capital gain rollover, 44.1(1), (11)

Eligible supplies expense

- defined, for teacher school-supplies credit, 122.9(1)
- refundable credit for, 122.9(2)B(b)

Eligible survivor benefit period

- defined, Reg. 8500(1)

Eligible taxable capital gains of trust, defined, 108(1)“eligible taxable capital gains”**Eligible taxation year**

- defined, for retroactive spreading of lump-sum payments, 110.2(1)

Eligible taxpayer

- defined, for small business investment tax credit, 127(9)

Eligible temporary relocation

- defined, for labour mobility deduction, 8(14)(c)
- expense, *see* Eligible temporary relocation expense

Eligible temporary relocation expense

- defined, for labour mobility deduction, 8(14)(d), (e)

Eligible tool

- cost of, 8(7)
- deduction for, *see* Apprentice: mechanic
- defined, 8(6)(b), 8(6.1)

Eligible tradesperson

- deduction for moving to temporary work, 8(1)(t)
- defined, for labour mobility deduction, 8(14)(a)

Eligible transferee (of forgiven debt)

- agreement to transfer forgiven amount to, 80.04(4)
- defined, 80.04(2)

Eligible travel period

- defined, for long-haul trucker rules, 67.1(5)

Eligible trust

- defined
- for Canadian Wheat Board farmers, 135.2(1)
- for FAPI rules, 95(1)

Eligible unit

- defined, re Canadian Wheat Board Farmers' Trust, 135.2(1)

Eligible variable benefit withdrawal amount

- defined, 60.022(3)

Eligible volunteer firefighting services

- credit for, 118.06(2)
- defined, 118.06(1)

Eligible waste fuel

- defined, Reg. 1104(13)
- used in energy generation system, Reg. Sch. II:Cl. 43.1(c)(i)(A), Sch. II:Cl. 43.1(d)(ix), Sch. II:Cl. 43.2

Eligible waste management facility

- defined, Reg. 1104(13)

Eligible wind-up distribution (of Canadian Wheat Board Farmers' Trust)

- defined, 135.2(1)

Elk, 80.3(1)“breeding animals”**Email, *see* Electronic mail****Emergency-response vehicle**

- deemed not to be automobile, 248(1)“automobile”(b.1), (b.2)

Emergency worker

- volunteer
- exemption from employment income, 81(4)

Emigration, *see* Ceasing to be resident in Canada**Emigration disposition**

- defined, 74.2(3)

Emigration year

- defined
- for foreign tax credit, 126(2.21)
- for security for departure tax, 220(4.5)

Emissions allowance

- deemed cost, 27.1(2)
- defined, 248(1)
- excluded from taxable assistance, Reg. 7300(d)
- tax treatment of, 27.1

Emissions obligation

- defined, 248(1)
- restriction on deduction for, 27.1(3)

Emissions trading regime, 27.1

Employed

- defined, 248(1)
- in Canada
 - deemed, 115(2)(c)
 - non-residents, tax on, 2(3), 115(1)
 - part-year residents, 114

Employee

- aircraft
 - capital cost allowance, 8(1)(j)(ii), 13(11)
 - deductions allowed, 8(1)(j), 8(9)
- allowances, 6(1)(b)
- not income, 6(6)
- automobile (belonging to employee)
 - capital cost allowance, 8(1)(j)(ii), 13(11), Reg. 1100(1)(a)(x), 1100(6)
 - interest expense, 8(1)(j)(i), 67.2, 67.4
 - leasing expense, 67.3, 67.4
- automobile (belonging to employer)
 - employee of partner, 12(1)(y)
 - goods and services tax, treatment of, 6(7)
 - operating expenses, benefit, 6(1)(k), (l), Reg. 7305.1
 - rule for automobile salesperson, 6(2.1)
 - standby charge, benefit, 6(1)(e), 6(2)
- automotive products, transitional assistance benefits taxable, 56(1)(a)(v)
- benefit, *see* Benefit: employment
- benefit plan, *see* Employee benefit plan
- benefits taxable, 6(1)
- Canada Pension Plan, contribution, credit for, 118.7
- charity trust, receipts, Reg. 3502
- clergyman's residence, 8(1)(c)
- contribution to RPP deductible, 147.2(4)
- contribution to teachers' exchange fund, 8(1)(d)
- deductions, *see* Deductions in computing income from office or employment
- defined, 248(1)
- for employee life and health trusts, 144.1(1)
- for source deductions, Reg. 100(1)
- dues
 - deduction, 8(1)(i)
 - non-deductible, 8(5)
- dues to professional organization, deductible, 8(1)(i)(i)
- employer, as
 - deductions, 8(1)(i)(ii), 8(1)(l.1), 8(1)(l.2)
 - certificate of employer, 8(10)
- employment insurance premiums
 - as employer, deductions, 8(1)(l.1)
 - credit for, 118.7
- expenses of
 - deductions, 8(1)
 - general limitation, 8(2)
- foreign country, of
 - exemption, 149(1)(a)
 - family and servants of, 149(1)(b)
- former, *see* Former employee
- group insurance premium, portion taxable, 6(4)
- housing loan to, or spouse, 15(2.4)(b)
- includes officer, 248(1)
- income maintenance plan benefits, ITAR 19
- incorporated, *see* Personal services business
- international organization, of, tax deduction, 126(3)
- legal costs recovered, income, 56(1)(l)
- legal expenses of collecting or establishing right to wages, 81(1)(b)
- loan, *see* Employee loan
- meals, 8(4)
- more than five, *see* Six employees test
- musical instrument costs, 8(1)(p)
- negotiating contracts, expenses, 8(1)(f)

- certificate of employer, 8(10)
 - part-time
 - travelling allowance, excluded from income, 81(3.1)
 - payments received from employer
 - during employment, 5(1), 6(3)
 - on death, *see* Death benefit
 - on termination or retirement, *see* Retiring allowance
 - profit sharing plan, *see* Employees profit sharing plan
 - Quebec Parental Insurance Plan premiums
 - as employer, deductions, 8(1)(l.2)
 - credit for, 118.7:B(a.1), (a.2)
 - deduction for, 60(g)
 - railway, *see* Railway: employees, 8(1)(e)
 - registered pension plan contributions, 8(1)(m), 147.2(4)
 - retirement compensation arrangement, *see* Retirement compensation arrangement
 - return required of, re withholding of tax, 227(2), Reg. 107
 - where not filed, 227(3)
 - salary deferral arrangements, deduction for amounts forfeited under, 8(1)(o)
 - salesperson's expenses, 8(1)(f)
 - certificate of employer, 8(10)
 - share option benefits, 7(1)
 - shares held by trustee, 7(2)
 - shares purchased for, by trustee, 7(6)
 - sickness and accident benefits, income, 6(1)(f)
 - specified, *see* Specified employee
 - stock options, *see* Stock option
 - transport, away-from-home expenses, 8(1)(g)
 - travelling expenses of, 8(1)(h)
 - certificate of employer, 8(10)
 - limitation, 8(4)
 - re meals, 8(4)
 - trust, *see* Employee trust
 - unemployment insurance premiums
 - credit for, 118.7
 - union dues, deductible, 8(1)(i)(i)
- Employee benefit plan**
- allocations, 32.1(2)
 - amalgamation, on, 87(2)(j.3)
 - amount received from, *see* payments out of (*below*)
 - becoming retirement compensation arrangement
 - deemed contribution, 207.6(4)
 - benefits from, taxable, 6(1)(g)
 - not taxable under general benefit provision, 6(1)(a)(ii)
 - who deemed to received benefit, 6(1.2)
 - contributions to, 6(10)
 - not deductible, 18(1)(o)
 - when deductible, 18(10)
 - deduction in computing income of, 104(6)(a.1)
 - deduction to employer, 32.1
 - defined, 248(1)
 - distribution of property by, deemed disposition at cost amount, 107.1(b)
 - emigration of employee, no deemed disposition, 128.1(10)"excluded right or interest"(a)(vi)
 - excluded from non-resident trust rules, 94(1)"exempt foreign trust"(f)
 - excluded from various trust rules, 108(1)"trust"(a)
 - income of, 32.1(3)
 - payments out of
 - not subject to non-resident tax, 212(17)
 - to employee, taxable, 6(1)(g)
 - source withholding, 153(1)(a)
 - to employer, taxable, 12(1)(n.1)
 - prescribed arrangement, Reg. 6800
 - reversionary trust rules do not apply, 75(3)(a)
- Employee health and life trust, *see* Employee life and health trust**

Employee life and health benefit trust, *see* Employee life and health trust

Employee life and health trust, 144.1

- amalgamation of corporations, effect of, 87(2)(j.3)
- benefits under insurance plan administered by, 6(1)(f)(iii.1)
- ceasing to be resident in Canada, 128.1(4)(b.1)
- conditions for, 144.1(2), (3)
- deduction from income, 104(6)(a.4)
- deemed not to be EBP, 248(1)“employee benefit plan”(a)
- deemed not to be RCA, 248(1)“retirement compensation arrangement”(f.1)
- deemed not to be SDA, 248(1)“salary deferral arrangement”(e.1)
- defined, 144.1(2), 248(1)
- designated employee benefit, *see* Designated employee benefit
- distribution by
 - included in income if not designated employee benefit, 56(1)(z.2), 144.1(11)
 - withholding of tax at source
 - payment to Canadian resident, 153(1)(s)
 - payment to non-resident, 212(1)(w)
 - of property, deemed disposition at fair market value, 107.1(a)
- emigration of beneficiary, no deemed disposition, 128.1(10)“excluded right or interest”(e)(vi.1)
- employer contribution to
 - deductible to employer, 20(1)(s), 144.1(4)–(7)
 - not a taxable benefit to employee, 6(1)(a)(i)
- excluded from certain trust rules, 108(1)“trust”(a)
- exemption from Part XII.2 tax, 210(2)(d)
- former employees, 144.1(1)“employee”
- health and welfare trust
 - transfer of property to ELHT, 144.1(16)–(17)
 - treated as ELHT, 144.1(14)–(15)
- immigration of beneficiary, no deemed disposition, 128.1(10)“excluded right or interest”(e)(vi.1)
- key employee, *see* Key employee
- losses, carryback and carryforward, 111(7.3)–(7.4), 144.1(13)
- minimum tax not payable by, 127.55(f)(iv)
- prescribed payments permitted to employers, Reg. 9500
- prohibited investment, tax on, 207.9
- reversionary trust rules do not apply, 75(3)(b)

Employee loan, 6(9), 80.4(1)

- forgiven, amount to be included in income, 6(15)
- to buy motor vehicle, 15(2.4)(d)
- to buy stock, 15(2.4)(c)

Employee trust, 6(1)(h)

- allocations under, includable in income, 6(1)(h)
- benefits from, not includable in employee’s income, 6(1)(a)(ii)
- deduction in computing income of, 104(6)(a)
- defined, 248(1)
- distribution of property by, deemed disposition at fair market value, 107.1(a)
- emigration of employee, no deemed disposition, 128.1(10)“excluded right or interest”(e)(i)
- excluded from various trust rules, 108(1)“trust”(a)
- payments out of, not subject to non-resident tax, 212(17)
- receipt from, 12(1)(n)
- rollover to new trust, 248(1)“disposition”(f)(vi)
- trust not falling within definition, 108(1)“trust”(a.1)

Employees’ charity trust

- defined, Reg. 3500

Employees profit sharing plan

- allocations under, income, 6(1)(d), 144(3)
- capital gains allocated, 144(4)–(4.2)
- deferred profit sharing plan not an, 147(6)
- defined, 144(1), 248(1)
- disposition of property to, capital loss nil, 40(2)(g)(iv)(A)
- dividend credit allocated, 144(8)

- election, Reg. 1500
- emigration of employee, no deemed disposition, 128.1(10)“excluded right or interest”(a)(v)
- employer’s contribution, deduction, 20(1)(w), 144(5)
- excess EPSP amount
 - deduction from income to prevent double tax, 8(1)(o.2)
 - defined, 207.8(1)
 - tax on, 207.8(2)
- excluded from non-resident trust rules, 94(1)“exempt foreign trust”(e)
- excluded from various trust rules, 108(1)“trust”(a)
- foreign tax credit, 144(8.1)
- income allocated, 144(3)
- information return, Reg. 212
- interest income, allocation re, 144(8.2)
- payment under
 - portion excluded from income, 81(1)(k)
- payments “out of profits” defined, 144(10)
- receipts from, 12(1)(n)
 - by employee, 144(6)–(8)
- refund to former beneficiary, 144(9)
- registration of, as DPSP, 147(3), (4)
- reversionary trust rules do not apply, 75(3)(a)
- rollover to new trust, 248(1)“disposition”(f)(vi)
- trust not taxable, 144(2), 149(1)

Employer

- benefits provided by, taxable, 6(1)
- Canada Emergency Wage Subsidy (COVID-19), 125.7
- certificate re employees’ expenses, 8(10)
- contributions of
 - Canada Pension Plan, to
 - deductible, 8(1)(1.1)(i)
 - deferred profit sharing plan, to, 20(1)(y), 147(8)–(9.1)
 - limitation on deductibility, 18(1)(j)
 - employees profit sharing plan, to, 20(1)(w), 144(5)
 - employment insurance premiums
 - deductible, 8(1)(1.1)(i), 9(1)
 - pension plan, 20(1)(q), 147.2(1)–(3), Reg. Part XXVII [Revoked]
 - special, 20(1)(r)
 - profit sharing plan, to
 - limitation on deductibility, 18(1)(k)
 - Quebec Parental Insurance Plan premiums
 - deductible, 8(1)(1.2), 9(1)
 - registered supplementary unemployment benefit plan, to, 145(5)
 - limitation on deductibility, 18(1)(i)
- deduction re salary deferral arrangements, 20(1)(oo)
- defined, 248(1)
 - for automobile standby charge, 6(2)
 - for disability insurance top-up payments, 6(17)
 - for employee loans, 80.4(1)(b)(i)
 - for incorporated employee/RCA rules, 207.6(3)(a)
 - for municipal officer’s expense allowance, 81(3)(c)
 - for source deductions, Reg. 100(1)
 - generally, 248(1)
- eligible, *see* Eligible employer
- housing subsidy, taxable, 6(23)
- insolvent, commutation of benefits, *see* Registered pension plan: insolvent employer
- participating, defined, 147.1(1), Reg. 8308(7)
- payment to employee
 - during employment, 5(1), 6(3)
 - on death, *see* Death benefit
 - on termination or retirement, *see* Retiring allowance
- reimbursement for housing loss, 6(19)–(22)
- union locals all deemed to be one, for pension purposes, 252.1
- withholding of tax, 153(1), Reg. 101
- variations in deductions, Reg. 106

Employment

- benefits, *see* Benefit
 - defined, 248(1)
 - expenses, *see* Employee: expenses of
 - income from, 5(1), 6(1), Canada-U.S. Tax Treaty:Art. XV
 - reimbursement to employer, 8(1)(n.1)
 - insurance, *see* Employment insurance
 - loss from, 5(2)
 - office or, *see* Office or employment
 - outside Canada, tax credit (pre-2016), 122.3
 - special work site, at, 6(6)
 - termination of, *see* Former employee; Retiring allowance
- Employment Credit**, *see* Canada Employment Credit
- Employment insurance**, *see also* Registered supplementary unemployment benefit plan
- benefit
 - remuneration, Reg. 100(1)
 - repayment of, 60(v.1)
 - repayment of overpayment, deduction for, 60(n)(iv)
 - right to, no disposition on emigration, 128.1(10)“excluded right or interest”(h)
 - self-employment (Part VII.1), taxable, 56(1)(a)(iv)
 - taxable, 56(1)(a)(iv)
 - withholding tax, 153(1)(d.1), Reg. 100(1)“remuneration”(g)
 - income replacement benefits under temporary program, 56(1)(r)
 - premium
 - collection of debt by US Internal Revenue Service, Canada-U.S. Tax Treaty:Art. XXVI-A:9
 - paid by employee
 - as employee, credit, 118.7:B(a)
 - as employer, deduction, 8(1)(l.1)
 - paid by employer, deduction, 9(1) (general accounting principles)
 - paid by self-employed person, credit, 118.7:B(a)
 - Program for Older Worker Adjustment, *see* Older Worker Adjustment, Program for
 - tips and gratuities covered by, Reg. 100(1)“remuneration”(a.1)

Employment Insurance Act

- benefits under, *see* Employment insurance: benefit
- costs of appealing decision under, deductible, 60(o)
- recovery of, income, 56(1)(l)(ii)
- financial assistance under, 56(1)(r)

Enactment, *see also* Amendment; Legislation

- defined, ITAR 12“enactment”

End of taxation year

- defined, Reg. 1104(1)

Endowment date

- of exemption test policy, defined, Reg. 310

Endowment (to charity), *see* Enduring property [repealed]**Enduring property [repealed]**

- of registered charity
- defined, 149.1(1)

Energy

- conservation property, Reg. 8200.1, Reg. Sch. II:Cl. 43.1
- determination of, 13(18.1)
- disclosure of information to Energy, Mines & Resources, 241(4)(d)(vi.1)
- conversion grant
 - included in income, 12(1)(u), 56(1)(s)
 - information return re, Reg. 224
 - non-resident taxable on, 212(1)(s)
 - prescribed program, Reg. 5501
- distribution of, 66(15)“principal-business corporation”(h)
- electrical
 - combustion turbine for, separate class, Reg. 1101(5t)
 - corporation distributing or generating
 - equipment for, Reg. 1102(8), (9), Sch. II:Cl. 1(m), Sch. II:Cl. 2(c)
 - exclusion from CCA restrictions, Reg. 1100(26)(a)
 - information return, Reg. 213(1)
 - municipal corporation, exemption, 149(1.2)
 - equipment for processing in prescribed area, 127(9)“qualified property”(c.1)
 - generating equipment, capital cost allowance, Reg. Sch. II:Cl. 17(a.1)
 - generating, manufacturing & processing credit, 125.1(2)
 - producing or processing, 125.1(3)“manufacturing or processing”(h), Reg. 1104(9)(h)
 - generation of, 66(15)“principal-business corporation”(h)
 - property, *see* Specified energy property
 - renewable, generation of, Reg. Sch. II:Cl. 43.1

Energy Cost Benefit

- disclosure of taxpayer information to enable payment, 241(4)(d)(vii.2)
- payments non-taxable, 81(1)(g.5)

Energy, Mines & Resources, *see* Department of Energy, Mines and Resources**Enforcement of Act**, 220–244, *see also* Collection of tax**Engineer**, *see* Professional practice**England**, *see* United Kingdom**Enhanced combined cycle system**

- defined, Reg. 1104(13)

Enhanced garnishment, 224(1.2), (1.3)**Enhanced recovery equipment**, Reg. 1206(1)

- proceeds of disposition, 59(3.3)(d)

Enquiry, *see* Inquiry**Entering Canada**, *see* Becoming resident in Canada**Entertainer**

- U.S. resident, Canada-U.S. Tax Treaty:Art. XVI

Entertainment expenses (and meals)

- airplane, train, bus travel, 67.1(4)
- Christmas party exemption, 67.1(2)(f)
- club dues and facilities, 18(1)(l)
- construction work camp exemption, 67.1(2)(e.1)
- “entertainment” meaning of, 67.1(4)
- general limitation on deduction for, 67.1(1)
 - exceptions, 67.1(2)
 - included in convention fee
 - limitation on deductibility, 67.1(3)
 - interpretation, 67.1(4)

Entity

- defined
 - for Common Reporting Standard, 270(1)
 - for electronic funds transfer reporting, 244.1
 - for foreign affiliates, 95(1)
 - for SIFT trust and partnership distributions, 122.1(1)
 - for stapled-security rules, 18.3(1), 122.1(1)
 - for third-party civil penalty, 163.2(1)

Entrant bank

- defined, for conversion of foreign bank affiliate to branch, 142.7(1)

Entrusted shares percentage [repealed], *see* Exempt shares percentage**Entry**

- Canada, into, *see* Becoming resident in Canada
- dwelling-house, into, for audit, 231.1(3), *see also* Search warrant
 - compliance required, 231.5(2)

Environment

- conservation of, *see* Ecological gifts

Environmental law

- compliance with

- Environmental law (*cont'd*)
- required for certain Canadian renewable and conservation expenses, Reg. 1219(5)
 - required for clean-energy CCA, Reg. 1104(17)
- Environmental Quality Act (Quebec)**
- trust required by, no tax on, 149(1)(z.1)
- Environmental trust**, *see* Qualifying environmental trust
- Environmentally hypersensitive person**
- equipment qualifying for medical expense credit, Reg. 5700(c)–(c.2)
- Equalization payments (family law)**
- rules on partition of property, 248(20)
- Equipment**
- administering oxygen, for, 118.2(2)(k)
 - automotive, CCA, Reg. Sch. II:Cl. 10(a), *see also* Automobile
 - bituminous sands
 - defined, 59(6), Reg. 1206(1)
 - proceeds of disposition, 59(3.3)(c)
 - cable systems interface, CCA, Reg. Sch. II:Cl. 10(v)
 - contractor's movable, CCA, Reg. Sch. II:Cl. 10(h), Sch. II:Cl. 22, Sch. II:Cl. 38
 - data communication, CCA, Reg. Sch. II:Cl. 3
 - disability-specific, deduction for, 20(1)(rr)
 - earth-moving, separate class, Reg. 1101(5k)
 - electrical energy processing, investment tax credit, 127(9)“qualified property”(c.1)
 - electrical generating, Reg. 1100(1)(t), (ta), Reg. Sch. II:Cl. 1(k), Sch. II:Cl. 1(m), Sch. II:Cl. 2(a), Sch. II:Cl. 8(g), Sch. II:Cl. 9(e), Sch. II:Cl. 9(f), Sch. II:Cl. 29
 - electronic data-processing, CCA, Reg. Sch. II:Cl. 10(f), Sch. II:Cl. 29
 - general-purpose, defined, Reg. 1104(2)
 - enhanced recovery, Reg. 1206(1)
 - proceeds of disposition, 59(3.3)(d)
 - for hearing- or sight-impaired, business expense, 20(1)(rr)
 - gas manufacturing/distribution, CCA, Reg. Sch. II:Cl. 1(n), Sch. II:Cl. 2(d)
 - gas or oil well, CCA, Reg. 1104(2), Reg. Sch. II:Cl. 10(j)
 - generating, Reg. 1100(1)(t), (ta), Reg. Sch. II:Cl. 1(k), Sch. II:Cl. 1(m), Sch. II:Cl. 2(a), Sch. II:Cl. 2(c), Sch. II:Cl. 8(f), Sch. II:Cl. 8(g), Sch. II:Cl. 9(a), Sch. II:Cl. 9(e), Sch. II:Cl. 9(f), Sch. II:Cl. 29
 - heat production/distribution, CCA, Reg. Sch. II:Cl. 1(p), Sch. II:Cl. 2(f)
 - logging, CCA, Reg. Sch. II:Cl. 10(o)
 - machinery and, CCA, Reg. Sch. II:Cl. 8, Sch. II:Cl. 29
 - medical, 118.2(2)(m), Reg. 5700
 - mining, CCA, Reg. Sch. II:Cl. 10(k), Sch. II:Cl. 10(l), Sch. II:Cl. 10(m), Sch. II:Cl. 41
 - oil or gas well, CCA, Reg. Sch. II:Cl. 10(j), Sch. II:Cl. 41
 - petroleum/natural gas exploration, CCA, Reg. Sch. II:Cl. 10(t), Sch. II:Cl. 41
 - pollution control, Reg. 1100(1)(t)
 - prescribed
 - for sight- or hearing-impaired, business expense, 20(1)(rr)
 - medical, 118.2(2)(m), Reg. 5700
 - radar, CCA, Reg. Sch. II:Cl. 9
 - radio communication, CCA, Reg. Sch. II:Cl. 8, Sch. II:Cl. 9
 - railway traffic control, CCA, Reg. Sch. II:Cl. 1(i)
 - scientific research, for, 37(8)(a)(ii)
 - solar heating, CCA, Reg. Sch. II:Cl. 43.1(d)(i), Sch. II:Cl. 43.2(b)
 - stable, CCA, Reg. Sch. II:Cl. 10(c)
 - telephone/telegraph, CCA, Reg. Sch. II:Cl. 3, Sch. II:Cl. 17
 - tertiary recovery, Reg. 1206(1)
 - timber limit, for, CCA, Reg. Sch. II:Cl. 10(n), Sch. II:Cl. 15
 - water-distributing, CCA, Reg. Sch. II:Cl. 1(o), Sch. II:Cl. 10(e)
- Equity**
- defined
 - for RRSP, RRIF, TFSA, RESP and RDSP advantage rules, 207.01(1)
 - for SIFT trust definition, 122.1(1)
 - for trust loss trading, 251.2(1)
- Equity-accounted entity**
- defined, for alternative interest-deduction restrictions, 18.21(1), (4)
- Equity accounting method**
- prohibited for debt forgiveness reserve, 61.3(1)(b)C(i)
 - prohibited for purposes of Act, 248(24)
- Equity amount**
- defined, for thin capitalization rules, 18(5), (5.3)
- Equity contribution**
- defined, for thin capitalization rules, 18(5)
- Equity interest**
- for alternative interest-deduction restrictions
 - defined, 18.21(1)
 - hybrid mismatch arrangement rules
 - defined, 18.4(1)
 - in non-resident corporation without share capital
 - defined, 93.2(1)
 - treated as a share, 93.2(2)
- Equity limit (of insurer)**
- defined, Reg. 2400(1)
- Equity or debt interest**
- defined, for Common Reporting Standard, 270(1)
- Equity or financing return**
- defined, for hybrid mismatch arrangement rules, 18.4(1)
- Equity percentage**
- defined
 - for foreign affiliate rules, 95(4)
 - for certain foreign affiliate surplus computations, Reg. 5905(14)
 - for private foundations, 149.1(1)
 - direct, defined, 95(4)“direct equity percentage”
- Equity property**
- defined, Reg. 2400(1)
- Equity share, defined**, 204, Reg. 4803(1)
- Equity value**
- defined
 - for SIFT trust and partnership distributions, 122.1(1)
 - for stapled-security rules, 18.3(1), 122.1(1)
 - for trust loss trading, 122.1(1), 251.2(1)
- Equivalent to married credit**, 118(1)B(b)
- Equivalent to spouse credit**, 118(1)B(b)
- Escalating interest GICs**
- income accrual, Reg. 7000(2)(c.1)
- Established securities market**
- defined, for Common Reporting Standard, 270(1)
- Establishment**, *see* Permanent establishment
- Estate**, *see also* Trust (or estate)
- bankrupt, of
 - deemed not trust or estate, 128(1)(b)
 - defined, 248(1)
 - Canada/Quebec Pension Plan death benefit taxed, 56(1)(a.1)
 - carryback of losses to year of death, 164(6)
 - debt of deceased settled by, 80(2)(p), (q)
 - defined, 104(1), 248(1)
 - flow-through of death benefits, 104(28)
 - income of, paid to non-resident, 212(1)(c), 212(11)
 - exemption for, 212(9), (10)
 - information returns, Reg. 204
 - life, *see* Life estate in real property
 - *pur autre vie*, *see* Life estate in real property
 - return required, 150(1)(c)
 - transfer of rights or things to beneficiaries, 70(3)

Estate administration tax, *see* Probate fees

Estate freeze, 86(1) (Notes)

Estate planning, *see also* Death of taxpayer

- attribution rule inapplicable on certain benefits through trust, 74.4(4)

Estate tax

- Canadian [repealed in 1972]
- interest on, deductible, 60(d)
- U.S.
- credit for, Canada-U.S. Tax Treaty: Art. XXIX-B:6, 7
- interest on, possibly deductible, 60(d)

Estimate of tax, required, 151, *see also* Instalment payments (Instalments)

Estimate of the expenses of survey

- defined, Reg. 3600(2)

Estimated annual taxable income

- defined, Reg. 102(2)(c)

Estimated deductions

- defined, for source deductions, Reg. 100(1)

Estonia, *see also* Foreign government

- universities, gifts to, Reg. Sch. VIII, s. 25

Euro, *see* European Union: currency of

European Bank for Reconstruction and Development

- bonds of, qualified investment for RRSP etc., 204“qualified investment”(c.1) (formerly Reg. 4900(1)(l)(v))
- no withholding tax on interest payable to, Reg. 806.1

European Union, *see also* Foreign government

- currency of, use as functional currency, 261(1)“qualifying currency”(b)

Evasion of tax, *see* Tax evasion, penalty for

Evidence, *see* Proof

Examination fees for professional status

- tuition credit, 118.5(1)(d)

Excepted dividend

- defined, 187.1

Excepted gift

- defined, 118.1(19)
- donation to charity permitted, 118.1(13)

Excess ALDA transfer

- defined, 205(1)
- tax on, 205(2)

Excess amount (for registered education savings plan)

- defined, 204.9(1), (2)

Excess capacity

- defined, for interest deduction restrictions, 18.2(1), 248(1)

Excess corporate holdings percentage

- defined, for private foundations, 149.1(1)

Excess EPSP amount, *see* Employees profit sharing plan: excess EPSP amount

Excess liquidity

- defined, for FAPI of banks, 90(15), 95(2.43)

Excess money purchase transfer

- re past service event, Reg. 8303(7.1)

Excess TFSA amount

- defined, 207.01(1)
- tax on, 207.02

Excessive eligible dividend designation

- defined, 89(1), 248(1)

Excessive interest and financing expenses limitation (EIFEL)

- alternative calculation, 18.21
- limited to 30% of EBITDA, 18.2(2)B(b)
- exclusions, 18.2(1)“excluded entity”, “excluded interest”
- group ratio alternative, 18.21
- partnership add-back, 12(1)(1.2)
- windup, effect of, 88(1.1), (1.11)

Exchange period

- defined, for SIFT unwinding rules, 85.1(7)(a)

Exchange rate, *see also* Foreign currency

- defined, 111(8)

Exchange share

- defined, for SIFT unwinding rules, 85.1(7)(b)

Exchange-traded fund

- rules for allocation to redeemers, 132(5.31)

Exchanges of property

- amalgamation, effect of, 87(2)(1.3)
- capital property, 44
- corporation controlling or controlled by taxpayer, 44(7)
- depreciable property, 13(4), (4.1)
- leasing properties, 16.1(5)–(7)
- non-qualifying security donated to charity, 118.1(15)
- non-resident, 44(7)

Exchanges of shares, *see* Share

Excise Tax Act, *see also* Goods and services tax (GST)

- communication of information for enforcement of, 241(4)(d)(ii)
- fuel tax rebate under, 12(1)(x.1)
- GST included in taxable benefit, 6(7), 15(1.3)
- input tax credit under, deemed to be government assistance, 248(16)–(18)
- rebate under, deemed not to be reimbursement, 8(11)
- tax payable under Part IX, 248(1)“goods and services tax”

Excluded account

- defined, for Common Reporting Standard, 270(1)

Excluded acquisition or disposition

- defined, for FAPI stub-period rules, 91(1.3)

Excluded amount

- re expenses of financing
 - defined, 20(1)(e)(iv.1)
 - no deduction, 20(1)(e)
- re registered education savings plan
 - defined, 146.1(7.2)
 - excluded from income, 146.1(7.1)(b)
- re split income
 - defined, 120.4(1)
 - excluded from income-splitting tax, 120.4(1)“excluded amount”

Excluded benefits (re registered pension plan)

- defined, Reg. 8303(5)(f)–(l), 8504(10)
- excluded from normalized pension, Reg. 8303(5)

Excluded building (re LNG liquefaction facility)

- defined, Reg. 1104(2)
- excluded from additional CCA, Reg. 1104(2)“eligible liquefaction building”

Excluded business

- defined, for income-splitting tax, 120.4(1)

Excluded consideration

- defined, re corporation attribution rules, 74.4(1)
- excluded from attribution rules, 74.4(2)(f), 74.4(3)

Excluded contribution (to registered pension plan)

- defined, Reg. 8300(1)
- excluded from pension credit, Reg. 8301(4)(a), 8301(5)(a), 8301(8)(e)
- excluded from provisional PSPA, Reg. 8303(8)

Excluded corporation

- charities, non-qualified investment rules
- debt excluded from non-qualified investments, 149.1(1)“non-qualified investment”(a)(ii)
- defined, 149.1(1)“non-qualified investment”(d)–(f)
- refundable investment tax credit
 - defined, 127.1(2)
 - excluded from additional credit, 127.1(2)“refundable investment tax credit”(a) pre-(f), 127.1(2.01)

Excluded disposition

- defined, 150(5)
- does not require tax return to be filed, 150(1)(a)(i)(C), (D), 150(1.1)(b)(iii)

Excluded dividend (for Part VI.1 tax)

- defined, 191(1), 191(4)(d)
- excluded from dividend allowance, 191.1(2)
- excluded from “excepted dividend” for Part IV.1 tax, 187.1(d)
- excluded from Part VI.1 tax, 191.1(1)(a)(i)–(iii)

Excluded entity

- defined, for interest deduction restrictions, 18.2(1)
- anti-avoidance rule, 18.2(15)
- excluded from interest deduction restrictions, 18.2(2) opening words
- for partnership, 12(1)(1.2)B(i)

Excluded equipment (re LNG liquefaction facility)

- defined, Reg. 1104(2)
- excluded from additional CCA, Reg. 1104(2)“eligible liquefaction equipment”

Excluded income

- defined, for FAPI rules, 92(2.5)

Excluded individual

- defined, re disclosure of taxpayer information, 241(10)
- information about, not to be disclosed, 241(4)(l), (9.3), (9.4)

Excluded interest

- for interest deduction restrictions
- defined, 18.2(1)
- excluded from IFE, 18.2(1)“interest and financing expenses”A(a)(i)
- in partnership
- defined, 40(3.15)–(3.18)
- grandfathered from deemed-gain rules for passive partnership interest, 40(3.1)

Excluded lease

- defined, for interest deduction restrictions, 18.2(1)
- excluded from restrictions, 18.2(1)“interest and financing expenses”A(f)

Excluded MNE group

- defined, for country-by-country reporting, 233.8(1)

Excluded obligation

- re debt forgiveness
- defined, 80(1)
- principal amount excluded from debt forgiveness rules, 80(1)“forgiven amount”B(j)
- proceeds of disposition for debtor, 79(3)F(b)(iv)
- re flow-through shares
- application to prescribed shares, Reg. 6202.1(1)(b), (c)
- deemed not to be a guarantee, security or similar indemnity, Reg. 6202(1)(m.1)
- defined, Reg. 6202.1(5)
- excluded from limited partnership at-risk rules, 96(2.2)(d)(vii)
- excluded from tax shelter at-risk adjustment, 143.2(3)(b)(iv)
- re non-resident withholding tax on interest
- defined, 214(8)
- sale of, by non-resident, 214(7)

Excluded payment

- defined, re indexed debt obligations, Reg. 7001(7)

Excluded period

- defined, re salary deferral arrangement, 6(13)(a)(ii)

Excluded personal property, see Excluded right or interest**Excluded policy**

- defined, for application of IFRS to insurers, 138(12)

Excluded premium

- defined
- for Home Buyers’ Plan, 146.01(1)
- for Lifelong Learning Plan, 146.02(1)

- excluded from repayment of eligible amount
- Home Buyers’ Plan, 146.01(3)(a)
- Lifelong Learning Plan, 146.02(3)(a)

Excluded production (re Canadian film/video credit)

- defined, Reg. 1106(1), (1.1)
- excluded from Canadian film or video production, Reg. 1106(4)

Excluded property

- art flips, defined, 46(5)
- debt forgiveness rules
- adjusted cost base of, not reduced, 80(9)–(11)
- defined, 80(1)
- emigration, *see* Excluded right or interest
- foreign affiliate, of
- accrued gains, included in FAPI, Reg. 5907(13)(b)(i)
- defined, 95(1), Reg. 5907(1)
- excluded from FAPI calculation, 95(1)“foreign accrual property income”B, E, 95(1)“relevant tax factor”(a)
- net earnings from, Reg. 5907(1)“net earnings”(d)
- net earnings of foreign affiliate from, Reg. 5907(1)“taxable earnings”(b)(v)
- net loss from, Reg. 5907(1)“net loss”(d)
- net loss of foreign affiliate from, Reg. 5907(1)“taxable loss”(b)(iv)
- of second affiliate, 95(2)(a)(ii)(D)(III)
- settlement of debt, gain or loss relating to, 95(2)(i)
- mark-to-market rules
- defined, 142.2(1)
- extended reassessment period, 152(6.2)
- non-resident, of
- defined, 116(6), Reg. 810
- excluded from disposition certificate requirements, 116(1), (3), (5), (5.1)(a)
- personal-use property donated to charity, 46(5)
- qualified investments for DPSP
- defined, 204
- RRSP, RRIF, TFSA, RESP and RDSP advantage rules
- defined, 207.01(1)
- trust, of
- defined, 108(1)
- excluded from rule preventing rollout to 75(2) trust, 107(4.1)

Excluded remuneration (re registered pension plan)

- defined, Reg. 8503(14)(b)
- excluded from pension adjustment, Reg. 8503(14)(e)

Excluded revenue

- defined, for FAPI rules, 92(2.5)

Excluded right or interest

- defined, 128.1(10)
- excluded from deemed disposition
- on emigration, 128.1(4)(b)(iii)
- on immigration, 128.1(1)(b)(iv)

Excluded security (for debt forgiveness rules)

- defined, 80(1)
- excluded from rule where share issued in exchange for debt, 80(2)(g)

Excluded share

- re Part X tax on DPSPs
- defined, 204
- excluded from equity share, 204“equity share”(a), (b)

Excluded shares

- defined, for income-splitting tax, 120.4(1)

Excluded subsidiary entity

- defined, for SIFT trust definition, 122.1(1)

Excluded trust

- defined
- foreign reporting rules, 233.6(2)
- qualifying environmental trust rules, 211.6(1)

- Excluded trust (*cont'd*)
- shareholder benefit rules, 15(1.4)(d)
- Excluded withdrawal**
- defined
 - for Home Buyers' Plan, 146.01(1)
 - for Lifelong Learning Plan, 146.02(1)
 - not taxable, 146(8), (8.01)
- Exclusive economic zone**
- application of legislation to, *Interpretation Act* 8(2.1)
 - defined, *Interpretation Act* 35(1)
 - SR&ED performed in, deemed performed in Canada, 37(1.3)
- Executive compensation repayment amount**
- defined, for Canada Emergency Wage Subsidy, 125.7(1)
 - repayment of part of wage subsidy, 125.7(14), (14.1)
- Executive remuneration**
- defined, 125.7(1)
- Executor**, *see also* Legal representative
- certificate required by, before distribution, 159(2)
 - deemed to be legal representative, 248(1)“legal representative”
 - obligations of, 159
 - return required by, 150(3)
 - withholding tax, liable for, 227(5), (5.1)(i)
- Exempt activity**
- for tobacco manufacturers' surtax, 182(2)
 - defined, 182(2)
 - no surtax on, 182(2)“tobacco manufacturing
- Exempt amount**
- defined, for non-resident trust rules, 94(1)
- Exempt capital gains balance (re flow-through entity)**
- after 2004, added to adjusted cost base, 53(1)(p)
 - defined, 39.1(1), (7)
 - used to reduce capital gain, 39.1(2)–(6)
- Exempt collective investment vehicle**
- defined, for Common Reporting Standard, 270(1)
- Exempt contribution (to TFSA)**
- defined, 207.01(2)
 - permitted, 207.01(1)“excess TFSA amount”A(b), 207.01(1)“unused TFSA contribution room”(b)D(ii)
- Exempt corporation**, *see also* Exempt person
- becoming or ceasing to be exempt, 149(10)
 - capital dividend account, 89(1.2)
 - deemed disposition/acquisition of depreciable property, 13(7)(f)
 - loss carryover, restriction, 149(10)(c)
 - resource expenses, rules, 66.7(10)
 - electronic filing not required, Reg. 205.1(2)(d)
 - Parts IV, IV.1, VI and VI not applicable, 227(14)
- Exempt deficit (of foreign affiliate)**
- defined, Reg. 5907(1)
- Exempt earned income**
- contribution of, to PRPP, 147.5(31)–(34)
 - defined, for pooled registered pension plan, 147.5(1)
- Exempt earnings (of foreign affiliate)**
- defined, Reg. 5907(1)
- Exempt foreign trust**
- defined, 94(1)
- Exempt gains balance**, *see also* Exempt capital gains balance (re flow-through entity)
- defined, 14(5) [before 2017]
 - effect of excessive election, 14(9) [before 2017]
- Exempt income**
- defined, 248(1)
 - under treaty, used in calculating clawback, Canada-U.S. Tax Treaty:Art. XXIV:10
- Exempt-income contribution amount**
- defined, for pooled registered pension plan, 147.5(1)
- reduces unused RRSP deduction room, 146(1)“unused RRSP deduction room”(b)D(iv)
- Exempt loan of transfer**
- defined, re loans to non-residents, 17(15)
- Exempt loss (of foreign affiliate)**
- defined, Reg. 5907(1)
- Exempt person**, *see also* Exempt corporation
- capital gains and losses, 40(2)(a)(i)
 - exchanges of property, determination of gain, 44(7)
 - for investments by deferred income plans
 - defined, Reg. 4901(2)“connected shareholder”(b), 4901(2)“designated shareholder”(a)(ii)
 - for non-resident trust (NRT) rules
 - defined, 94(1)
 - excluded from NRT rules, 94(1)“contributor”, 94(1)“resident beneficiary”
 - no reserve for amount not due until later year, 20(8)
 - obligation issued at discount by, 16(2), (3)
 - partnership of, effect where taxable partner joins, 96(8)
 - sale of Canadian resource property by, 66.6
 - U.S. charitable organization, Canada-U.S. Tax Treaty:Art. XXI
- Exempt policy**
- defined, 12.2(11), Reg. 306
- Exempt property**
- for specified leasing property CCA rules
 - defined, Reg. 1100(1.13), (1.14)
 - excluded from specified leasing property, Reg. 1100(1.11)
 - for trusts' 21-year deemed disposition rule
 - defined, 108(1)
 - excluded from deemed disposition, 104(4), (5), (5.2)
- Exempt service**
- defined, for non-resident trust rules, 94(1)
 - excluded from service being a deemed transfer of property, 94(2)(f)
- Exempt shares percentage**
- defined, for private foundations, 149.1(1)
- Exempt surplus (of foreign affiliate)**
- adjustment where gain deemed due to negative adjusted cost base, 93(1)(b)(ii)
 - deduction for dividend paid out of, 113(1)(a), Reg. 5900(1)(a)
 - defined, 113(1)(a), Reg. 5907(1)
 - portion of dividend deemed paid out of, Reg. 5900(1)(a)
- Exempt trust**
- defined, for FAPI rules, 95(1)
 - defined, foreign reporting rules, 233.2(1), *see also* Exempt foreign trust
- Exemption test policy**
- defined, Reg. 306(3)
- Exemption threshold**
- deemed capital gain on donation of flow-through share, 40(12)
 - defined, 54
- Exemption-end time**
- defined, for TFSA, 146.2(9)(a)
- Exemptions**, 81, 149, *see also* Grandfathering
- agricultural organizations, 149(1)(e), 149(2)
 - apportionment rule, 149(6)
 - Association of Universities and Colleges of Canada, 149(1)(h.1)
 - basic, re minimum tax, 127.53
 - benevolent or fraternal benefit society, 149(4)
 - limitation, 149(4)
 - benevolent society, 149(1)(k)
 - boards of trade, 149(1)(e), 149(2)
 - capital gains, 110.6, *see also* Capital gains deduction
 - chambers of commerce, 149(1)(e), 149(2)
 - charitable organization, 149(2)
 - compensation by Federal Republic of Germany, 81(1)(g)

Exemptions (cont'd)

- Crown corporations, 149(1)(d)–(d.4)
 - exception, 27(1), (2)
- employee of foreign country, 149(1)(a)
 - family and servants of, 149(1)(b)
- expenses of gaining exempt income not deductible, 18(1)(c)
- fraternal benefit society/order, 149(1)(k)
- funeral arrangements, 148.1(2), 149(1)(s.1)
- general, 149
- Governor General's stipend, 81(1)(n)
- Halifax disaster pension, 81(1)(f)
- housing corporation, 149(1)(i), 149(2)
- income from aircraft operated by non-resident, 81(1)(c)
- income from ship operated by non-resident, 81(1)(c)
- insurer of farmers and fishermen, 149(1)(t), 149(4.2)
 - limitation, 149(4.1)
- labour organizations, 149(1)(k)
- master trust, 149(1)(o.4)
- mines, Reg. Part XIX [Revoked]
- municipal authorities, 149(1)(c)
- municipal corporations, 149(1)(d.6)
- mutual insurance corporations, 149(1)(m)
- non-profit corporation for scientific research, 149(1)(j), 149(2)
- non-profit organizations, 149(1)(l), 149(2)
 - deemed trust, 149(5)
- pension corporation, 149(1)(o.1), (o.2)
- pension trust, 149(1)(o)
- personal, *see* Personal credits
- personal injury award, income from, 81(1)(g.1), (g.2)
- prisoners of war, compensation paid to, 81(1)(d)
- prospecting, 81(1)(l)
- provincial corporations, 149(1)(d)–(d.4)
- provincial indemnity, 81(1)(q)
- RCA trust, 149(1)(q.1)
- RCMP pensions, 81(1)(i)
- registered charities, 149(1)(f)
- scholarships, *see* Scholarship exemption
- scientific research corporation (non-profit), 149(1)(j), 149(2)
 - control, rules re, 149(8)
 - rules as to income, 149(9)
- service and other pensions, 81(1)(d)
- service pension from other country, 81(1)(e)
- small business investment corporation, 149(1)(o.3)
- social assistance payments, 110(1)(f)(ii)
- societies, 149(1)(l), 149(2)
 - deemed a trust, 149(5)
- statutory, 81(1)(a)
- trust
 - deferred profit sharing plan, 149(1)(s)
 - employees profit sharing plan, 149(1)(p)
 - registered disability savings plan, 146.4(5), 149(1)(u.1)
 - registered education savings plan, under, 149(1)(u)
 - registered retirement income fund, 149(1)(x)
 - registered retirement savings plan, 149(1)(r)
 - registered supplementary benefit plan, 149(1)(q)
 - vacation pay plan, 149(1)(y)
 - war savings certificate, 81(1)(b)
 - workers' compensation, 110(1)(f)(ii)

Existing guaranteed life insurance policy

- defined, 211(1)

Existing plan

- defined, Reg. 8500(1)

Exiting Canada, *see* Ceasing to be resident in Canada

Expectation of profit

- required for business deduction, 18(1)(h), 248(1)“personal or living expenses”

Expenditure

- defined
 - for rule disallowing deductions or credits for option or share issuance, 143.3(1)
 - for ruling disallowing contingent amounts and “right to reduce”, 143.4(1)
 - for tax shelter investment, 143.2(1)
- matchable, *see* Matchable expenditure

Expenditure pool (re investment tax credit), *see* SR&ED qualified expenditure pool

Expenses, *see also* Deductions in computing income

- advertising in non-Canadian periodicals etc., not deductible, 19
- advertising on non-Canadian broadcast media, not deductible, 19.1
- allowances for
 - taxable, 6(1)(b)
- annual value of property, not deductible, 18(1)(d)
- appeal, of, 60(o)
- automobile of employee
 - deductions allowed, 8(1)(j)
 - depreciation, 13(11)
- away-from-home
 - railway employee, 8(1)(e)
- borrowing money, 18(11), 20(1)(e), 21
- cancellation of lease, payment for, 20(1)(z), (z.1)
 - limitation on deductibility, 18(1)(q)
- capital outlay, not deductible, 18(1)(b)
- clearing farm land, 30
- club dues, not deductible, 18(1)(l)(ii)
- commission agent's, 8(1)(f), 13(11)
 - automobile or aircraft, 8(1)(j), 8(9)
 - certificate of employer, 8(10)
- construction of building or ownership of land, 18(3.1)–(3.7)
- convention, 20(10)
- development, *see* Canadian development expense
- drilling and exploration, defined, 66(15)“drilling or exploration expense”
- election, tax credit for, 127(3)–(4.2)
- employee, of, 8(1), (2)
- employee's automobile or aircraft, 8(1)(j), 8(9)
- exploration, *see* Canadian exploration expense; Exploration and development expenses
- food, beverages, entertainment, *see* Entertainment expenses (and meals)
- general limitation, 67
- improving farm land, 30
- incurred to gain exempt income, not deductible, 18(1)(c)
- interest, 18(11), 20(1)(c), 20(3)
 - borrowed money, on, 20(1)(c), 20(2)
 - used to acquire land, 18(3)
 - capitalization of, 21(1)
 - compound, 20(1)(d)
 - paid to acquire land, 18(2)
 - paid to non-resident shareholder, 18(4)–(8)
- investigation of site, 20(1)(dd)
- “investment expense” defined, 110.6(1)
- issuing units, interests or shares, 20(1)(e)
- land drainage system, 30
- landscaping, 20(1)(aa)
- limitations on deductibility, 18(1)
- listing fee, 20(1)(g)
- meals, limitation, 8(4)
- medical, *see* Medical expenses
- mining taxes, 20(1)(v)
- moving, *see* Moving expenses
- objection or appeal, of, 60(o)
- performing duties of office or employment, deduction, 8(1)(i)
- personal or living, not generally deductible, 18(1)(h)
- personal services business, limitation re, 18(1)(p)

Expenses (cont'd)

- prepaid
- amalgamation, on, 87(2)(j.2)
- limitation on deductibility, 18(9)
- printing financial report, 20(1)(g)
- reasonableness criterion, 67
- recreational facilities, 18(1)(l)
- relieving telegrapher or station agent, 8(1)(e)
- representation, 20(1)(cc)
 - deemed capital cost allowance, 13(12)
 - election to defer, 20(9), Reg. 4100
- research and development, 37
- salesperson's, deduction, 8(1)(f)
 - certificate of employer, 8(10)
- scientific research and experimental development, 37
- selling units, interests or shares, 20(1)(e)
- share transfer fees, 20(1)(g)
- taxes on unproductive land, not deductible, 18(2)
- tile drainage, 30
- transport employee's, 8(1)(g)
- travelling, *see* Travelling expenses
- unpaid for more than 2 years, 78
- utilities service connection, 20(1)(ee)
- yachts, camps, clubs etc., no deduction, 18(1)(l)

Exploration and development expenses

- borrowing for, 21(4)
- Canadian, *see* Canadian exploration and development expenses
- foreign, *see* Foreign exploration and development expenses
- joint exploration corporation, *see* Joint exploration corporation
- limitation, 66(13)
- recovery of, 59(3.2)
- where change in control, 66(11.4), (11.5)

Exploration and development grants, deductions, 20(1)(kk)**Exploration and development shares, *see also* Flow-through shares**

- cost to taxpayer, 66.3(1)(a)(iii)
- whether inventory, 66.3(1)(a)(ii)

Exploration and drilling rights

- dealers in, limitation, 66(5)

Export Development Canada

- loan guaranteed by, no UK withholding tax, Canada-U.K. Tax Treaty:Art. 11:3(a)

Exporting resource, Reg. 1206(1)**Exposure to a designated country**

- defined, Reg. 8006

Express consent

- defined, Reg. 209(4)

Expropriation

- amount paid constitutes proceeds of disposition, 13(21)"proceeds of disposition"(d), 54"proceeds of disposition"(d)
- foreign assets, *see* Expropriation assets
- resource properties, 59.1
- rollover where property replaced, 13(4), (4.1), 44

Expropriation assets

- acquired from foreign affiliate, 80.1(4)-(6)
- adjusted cost base of, 80.1(2)(b)
- adjusted principal amount, 80.1(7)
 - currency in which computed, 80.1(8)
- cost base, addition to, 53(1)(k)
- deductions from, 53(2)(n)
- election re, 80.1(1), Reg. 4500
- income from, computation of, 80.1(2)(a)
- interest and capital amounts received at same time, 80.1(3)
- interest on
 - election re, 80.1(2)
- sale of foreign property, for, 80.1

Extended motor vehicle warranty

- defined (insurance policy reserves), Reg. 1408(1)

Extension of time

- to file appeal
 - by Tax Court, 167
- to file election or application, 220(3.2)
- to file notice of objection
 - by Minister, 166.1
 - by Tax Court, 166.2
 - deadline for requesting, 166.1(7)(a)
- to file notice of qualified dependant for Canada Child Benefit, 122.62(2)
- to file return, 220(3)
- to invest in labour-sponsored venture capital corporation, 127.4(5.1)
- to make or revoke election or designation, 220(3.2)
- to make RRSP contribution, 146(22)
- to post security for departure tax, 220(4.54)

Extinct shellfish, *see* Ammonite gemstone**Eyeball Networks case overruled, 160(5)(c)****Eyeglasses, as medical expense, 118.2(2)(j)****F****FACL, *see* Foreign accrual capital loss****FAD, *see* Foreign affiliate dumping****FAPI, *see* Foreign accrual property income****FAPL, *see* Foreign accrual property loss****FAPI year**

- defined, Reg. 5907(1.5)

FATCA, *see* Foreign Account Tax Compliance Act (U.S.)**FEDE, *see* Foreign exploration and development expenses****FHSA, *see* First Home Savings Account****FIE, *see* Foreign investment entity****FINTRAC, *see also* Financial Transactions and Reports Analysis Centre (FINTRAC)**

- provision of information by CRA to, for limited purposes, 241(4)(d)(xv)

FMV, *see* Fair market value**FOI, *see* Foreign ordinary income; Freedom of information****FRE, *see* Foreign resource expenses****FTC, *see* Foreign tax credit****FTS, *see* Flow-through shares****Facsimile machine, *see* Fax machine****Factoring of accounts**

- income of foreign affiliate from, 95(1)"investment business"
- accounts arising in active business of related corporation, 95(2)(a)(iii), Reg. 5907(1)"exempt earnings"(d)(ii)(J)

Failure to file return, *see* Returns: failure to file, penalty**Failure to keep records, 230(3)****Failure to remit withheld taxes, 227(9)**

- penalty applicable only on amounts over \$500, 227(9.1)
- salary or wages, from, 227(9.5)

Failure to withhold tax, 227(8)

- assessment for, 227(10)
- salary or wages, from, 227(8.5)

Fair market value

- charitable donation of property, limited to cost, 248(35)-(38)
- cultural property, donated, 118.1(10)
- deemed disposition at, *see* Disposition: deemed
- defined, 69(1) (Notes)
- ecological gift, 118.1(10.1)-(10.5)
 - certificate, 118.1(10.5)
- inadequate considerations deemed to be, 69
 - exceptions re pre-1972 property, ITAR 32
- inventory property, of, 10(1), (4)
- meaning of, 69(1) (Notes)

Fair market value (*cont'd*)

- property donated or contributed, limited to cost, 248(35)–(38)
- property of deceased, 70(5.3)
- publicly-traded securities held since before 1972, ITAR 26(11)
- share
 - disposed of on death, 70(5.3)
- foreign affiliate, of, ITAR 26(11.1), (11.2)
- that is not capital property, 112(4.1)
- transfer at, to spouse or minor, 74.5(1)
- trust, capital interest in, 107.4(4)
- held as inventory, 107(1.2)
- trust for benefit of spouse, 70(8)(a)
- undivided interest in property transferred by tax debtor, 160(3.1)
- V-day election, Reg. 4700, Reg. Sch. VII

Fair value property

- defined, for mark-to-market rules, 142.2(1)

Fairness package (1991), *see* Taxpayer relief**False statement**, *see also* Penalty: false statement

- defined, for third-party penalty, 163.2(1)
- offence, 239(1), (1.1)
- penalty, 163(2)
- charity receipt, 188.1(9), (10)
- third-party penalty, 163.2

Family allowances, *see* Canada Child Benefit**Family Caregiver credit**

- additional amount, 118(1)B(a)(ii)C(A), 118(1)B(b)(iv)D(A), 118(1)B(b.1)
- base amount for infirm adult relative, 118(1)B(d)

Family farm or fishing corporation/partnership

- capital gains exemption on disposition, 110.6(2), (31)
- farm or fishing property leased to
 - transfer of, 70(9.8)
- interest in partnership, defined, 70(10)“interest in a family farm or fishing partnership”
- share of corporation, defined, 70(10)“share of the capital stock of a family farm or fishing corporation” 110.6(1)
- transfer of
 - *inter vivos*, 73(4), (4.1)
 - on death, 70(9.2), (9.21), (9.3), (9.31)
 - to parent, 70(9.6)

Family law, *see* Province: laws of; Spouse**Family Orders and Agreements Enforcement Assistance Act**

- Canada Child Benefit payments not garnishable under, 122.61(4)(e)
- disclosure of taxpayer information for purposes of, 241(4)(e)(vii)

Family Support Plan

- payroll deduction reduces source withholding, Reg. 100(3)(d)

Family Tax Cut (2014–15 only), 119.1**Farm Income Protection Act**, *see also* Net income stabilization account; NISA Fund No. 2

- payment received under, taxable, 12(1)(p)
- information return, Reg. 234–236
- premium paid under, deductible, 20(1)(ff)

Farm land, *see also* Farm or fishing property

- addition to adjusted cost base, 53(1)(i)
- improving, expenses deductible, 30
- instalment on sale of, not considered payment from production, 12(1)(g)

Farm loss

- amalgamation, on, 87(2.1)
- defined, 111(8)“farm loss”, (9), 248(1)
- determination of, by Minister, 152(1.1), (1.2), (1.3)
- drought, due to, *see* Drought or flood region: prescribed
- flood, due to, *see* Drought or flood region: prescribed
- includes fishing loss, 111(8)“farm loss”A(a)(i)

- limitation on deductibility, 111(3)
- partnership, from, 96(1)
- reassessment, 152(6)(c)
- reduction of, on debt forgiveness, 80(3)(b)
- restricted, 31(1), (1.1), *see also* Restricted farm loss

Farm or fishing property

- disposition by partnership, 101
- family farm or fishing corporation or partnership, transfer of, 70(9.2), (9.21)
- investment tax credit, 127(9)“qualified property”(c)(ii)
- leased, transfer of, 70(9.8)
- qualified
 - capital gains exemption, 110.6(2)
 - defined, 110.6(1)
 - transfer of
 - from spouse’s trust, to children, 70(9.1), (9.11)
 - *inter vivos*, to child, 73(3), (3.1)
 - reserve, 44(1.1)
 - to farmer’s child, ITAR 26(18), (19)
 - on death, 70(9), (9.01)
 - to parent, 70(9.6)

Farm quota

- capital gains exemption, 110.6(1)“qualified farm property”(d)

Farm risks

- insurance of, 149(1)(t), 149(4.1)

Farm support payments, *see also* Farm Income Protection Act

- defined, Reg. 234(2)
- information slips for payments under, Reg. 234–236

Farmer

- capital gain
 - principal residence, exclusion of, 40(2)(c)
- cash method of computing income, 28(1)
- instalments, 155
- payments to, income, 12(1)(p)
- transfer of farm property by, to child
 - *inter vivos*, 73(3), (3.1)
 - on death, 70(9), (9.01)

Farming

- business
 - capital cost allowance (pre-1972 property), Reg. Part XVII
 - cash-base method of calculation, 28
 - ceasing to carry on, 28(4), (5)
 - expenses deductible, 30
 - inventory
 - acquisition of, 28(1.1)
 - valuation of, 28(1.2), (1.3), Reg. 1802
 - losses, deduction for
 - adjustment to cost base of land, 53(1)(i), 111(6)
 - partnership, disposition of land used in, 101, 111(7)
 - prepaid expenses, 28(1)(e), (e.1)
 - Canadian Wheat Board participation certificate, 161(5)
 - cooperative, small business deduction on sales to, 125(7)“specified cooperative income”
 - crop insurance, *see* Farm Income Protection Act
 - defined, 248(1)
 - drought, sales during, *see* Drought or flood region: prescribed
 - exempt from tobacco manufacturers’ surtax, 182(2)“exempt activity”(a)
 - farm loss, defined, 111(8)
 - flood, sales during, *see* Drought or flood region: prescribed
 - income deferred from destruction of livestock, 80.3
 - inventory
 - acquisition of, 28(1.1)
 - amalgamation, on, 87(2)(b)
 - transfer to corporation, 85(1)(c.2)
 - valuation of, 28(1.2), (1.3), Reg. 1802
 - winding-up, on, 88(1.6)
 - losses, deduction for, 31

Farming (*cont'd*)

- reduction in basic herd, 29(2)
- • election re, 29(1)
- restricted farm loss, *see* Restricted farm loss
- stabilization payments and fees, 12(1)(p), 20(1)(ff)

Farming activities

- for carbon tax refund to farmers, 127.42(1)

Fax machine

- capital cost allowance, Reg. 1101(5p), Reg. Sch. II:Cl. 10(f)

Feasibility study

- re investigation of site, deductible, 20(1)(dd)

Federal body

- defined, Reg. 237(1)

Federal Court

- defined, *Federal Courts Act* s. 4
- registration of certificate re amount payable, 223(3)
- • charge on land, 223(5), (6)

Federal Court of Appeal

- appeal to
 - • Canadian amateur athletic association, revocation or refusal to register, 172(3)(a)
 - • charity revocation or refusal to register, 172(3)(a.1)
 - • DPSP, refusal to register, 172(3)(c)
 - • from Tax Court, *Tax Court of Canada Act* ss. 17.6, 18.24
 - • qualified donee revocation or refusal to register, 172(3)(a.2)
 - • RESP, refusal to register, 172(3)(e)
 - • RRIF, refusal to register, 172(3)(f)
 - • RRSP, refusal to register, 172(3)(b)
- defined, *Federal Courts Act* s. 3
- proceedings in camera, 179

Federal credit union

- defined, 248(1)
- excluded from definition of “bank”, 248(1)“bank”
- provincial allocation of income, Reg. 404.1

Federal Crown corporation, *see* Crown corporation**Federal government**, *see* Government**Federal-Provincial Fiscal Arrangements and Established Programs Financing Act**

- agreement under, 228

Federal sales tax

- refund of, taxable, 12(1)(x)(iv)

Federal sales tax credit, *see also* Goods and services tax (GST)**Fee**, *see also* Fees

- defined
 - • for notifiable-transaction rules, 237.4(1)
 - • for reportable-transaction rules, 237.3(1)

Feeding oneself

- defined, 118.4(1)(e)
- impairment with respect to
 - • certification by occupational therapist or physician
 - • • for disability credit, 118.3(1)(a.2)(iv)
 - • eligibility for disability credit, 118.4(1)(c)(ii)

Feedlot Health case overruled, 37(8)(a)(ii)(B)(II)**Fees**

- directors, 6(1)(c)
- included in income, 6(1)(c)
- investment counsel, 20(1)(bb)
- share transfer, deduction for, 20(1)(g)
- withholding tax, 153(1)(g)

Fees for an individual's tuition

- defined, 118.5(3)

Fellowship, *see* Scholarship**Fence**

- capital cost allowance for, Reg. Sch. II:Cl. 6
- in amusement park, CCA, Reg. Sch. II:Cl. 37

Ferrel case overruled, 120.4**Fertility treatment**

- medical expense credit, 118.2(2)(v)
- • medical infertility not required, 118.2(2.2)
- • surrogacy expenses, 118.2(2.21)

Festival organizer relief (COVID), Reg. 8901.1(2)(b)(xx)(A), *see also* Qualifying tourism or hospitality entity**Fiat demerger spinoff**, Reg. 5600(d)**Fibre-optic cable**

- capital cost allowance, Reg. Sch. II:Cl. 42(a)
- • supporting equipment, Reg. Sch. II:Cl. 3(1)

Fiduciary, *see* Legal representative; Trustee**Field processing**, *see* Canadian field processing**Fifth Supplement**, *see* Revised Statutes of Canada, 1985 (5th Supp.)**Figuroa case responded to**, 127(3.3) Notes**Filing deadlines**, *see also* Deadlines

- agreement to transfer forgiven amount (debt forgiveness rules), 80.04(6)(a), 80.04(7)
- annual returns, 150(1)
- claims for SR&ED
 - • deductions, 37(1), (8)
 - • investment tax credits, 127(9)“investment tax credit”(m)
- designation to flow out capital gains from trust, 104(21)–(21.03)
- discontinued business, Reg. 205(2)
- election to trigger capital gains exemption, 110.6(24)
- • revocation or amendment, 110.6(25), (27)
- expiring on Sunday or holiday, *Interpretation Act* s. 26
- extension by Minister, 220(3)
- information returns (T4, etc.), Reg. 205(1)
 - • distribution from foreign trusts, 233.5(1)
 - • foreign affiliates, 233.4(4)
 - • foreign property, 233.3(3)
 - • payments to non-residents, Reg. 202(7), (8)
 - • registered pension plan, Reg. 8409
 - • transfer of property to foreign trust, 233.2(4)
- interest offset applications, 161.1(3)(c)
- investment tax credit claims, 127(9)“investment tax credit”(m)
- preferred beneficiary election, 104(14)–(14.02)
- scientific research claims, 37(11), 127(9)“investment tax credit”(m)
 - • no extension allowed, 220(2.2)
 - • section 85 rollover, 85(6), (7)
 - • tax returns, 150(1)

Filing-due date, 150(1)

- defined, 248(1)

Filing electronically, *see* Electronic filing**Film**, *see* Motion picture film**Film agency**

- prescribed person for Canadian film/video tax credit, Reg. 1106(10)

Film credit, *see* Canadian film or video tax credit; Film or video production services credit**Film or video production services credit**, 125.5, *see also* Canadian film or video tax credit

- amalgamation of corporations, 87(2)(j.94)
- refund of credit before assessment, 164(1)(a)(ii)
- refundable credit, 125.5(3)
- revocation of certificate, 125.5(6)

Film property

- defined, for minimum tax purposes, 127.52(3)

Filter

- air or water, medical expense credit, Reg. 5700(c.1)

Finance comfort letters, *see* Table of Comfort Letters**Financial account**

- defined, for Common Reporting Standard, 270(1)

Financial accounts of non-residents

- reporting required, *see* Common Reporting Standard; *Foreign Account Tax Compliance Act*

Financial aid, *see* Assistance/government assistance; Reimbursement

Financial asset

- defined, for Common Reporting Standard, 270(1)

Financial difficulty (taxpayer in)

- debt forgiveness reserve for insolvent corporation, 61.3
- replacement obligations, exemption from non-resident withholding tax, 212(3)
- share, 248(1)“term preferred share”(e), *see also* Distress preferred share
- small business bond, 15.2 [no longer current]
- small business development bond, 15.1 [no longer current]

Financial institution, *see also* Bank; Insurance corporation; Investment dealer; Moneylender; Restricted financial institution

- accounting rule changes, transitional rules, 142.51
- amalgamation of, 87(2)(g.2)
- bad debt deduction, 20(1)(p)(ii)
- becoming, 142.6(1)(a), (b)
- ceasing to be, 142.6(1)(a), (c)
- debt obligation owned by, *see* Specified debt obligation
- defined
 - for charitable donations, 118.1(20)
 - for Common Reporting Standard, 270(1)
 - for financial institutions capital tax, 190(1)
 - for insurance corporations, Reg. 2400(1)
 - for Large Corporations Tax, 181(1)
 - for mark-to-market rules, 142.2(1)
 - for stop-loss rules, 112(6)(c), 142.2(1)
 - re disposition by financial institutions, Reg. 9200(1)
- dividends received by
 - mark-to-market property, 112(5)–(5.2)
- ineligible for election to treat Canadian securities as capital property, 39(5)(b)
- interference with remittance of tax, 227(5.2)–(5.4) (1995 draft, abandoned)
- mark-to-market property, *see* Mark-to-market property; Specified debt obligation
- non-resident, *see* Non-resident: financial institution
- Part VI tax, 190–190.211
 - deductible in computing branch tax liability, 219(1)(h)(i)
 - instalments, 157(1)
 - rates, 190.1(1)
 - short taxation year, 190.1(2)
 - unused, reassessment re, 152(6)(e)
- prescribed
 - for foreign affiliate rules, 95(2)(a.3), 95(2.5)“specified deposit”, Reg. 7900
- remittance of tax through, 229 [repealed]
- by large employers, required, 153(1), (1.4), Reg. 110
- reserve for doubtful debts, 20(1)(l)(ii)
- restricted, *see also* Restricted financial institution
 - election by mutual fund/investment corporation to not be, 131(10)
 - receiving dividends on taxable RFI shares
 - information return, 187.5
 - partnerships, 187.4
 - tax payable, 187.3(1)
 - time of acquisition of share, 187.3(2)
 - safety deposit box rented from, no deduction, 18(1)(l.1)
 - specified
 - defined, 248(1)
 - dividends received by, 112(2.1), (2.2)
 - guarantee agreement re shares, 112(2.2)–(2.22)
 - related corporations, 248(14)
 - superficial loss of, 18(13)–(16), 142.6(7)
 - transitional rules for accounting rule changes, 142.51

- windup of, *see* Winding-up: financial institution

Financial instrument

- defined, for hybrid mismatch arrangement rules, 18.4(1)

Financial intermediary corporation, defined, 191(1)

Financial Transactions and Reports Analysis Centre (FINTRAC)

- provision of charity information to, for security purposes, 241(9), (9.1)

Financially dependent child or grandchild, *see* Child: financially dependent

Financing fees

- deduction for, 20(1)(e), (e.1)
- election to capitalize, 21

Financing lease, *see* Direct financing lease

Financing subsidy

- provided by employer, taxable, 6(23)

Fine

- imposed for offence under ITA, *see* Offences
- non-deductible, 67.6

Finland, *see also* Foreign government

- stock exchange recognized, 262

Fire alarm indicator

- visual, for the hearing impaired, medical expense credit, Reg. 5700(q.1)

Firefighter

- killed in line of duty, tax-free benefit to families, 81(1)(j)
- pension accrual to retire early, *see* Public safety occupation
- vehicle of, deemed not to be automobile, 248(1)“automobile”(b.1)
- volunteer
 - credit if performs 200 hours per year, 118.06(2)
 - employment income exemption, 81(4)

First Home Savings Account, 146.5 [Proposed Addition]

First instalment base

- of corporation, 157(4), Reg. 5301(1)

First Nations, *see also* Indian

- drinking water class action settlement, no tax, 81(1)(g.3)(i)(D)

First Nations Tax, *see also* Indian

- federal credit for, 120(2.2)
- instalments, 156.1(1)“net tax owing”(b)B, E, F, 156.1(1.3)
- tax evasion offences, 239(5)

First responders

- fallen in duty, tax-free benefit to families, 81(1)(j)

First term shared-use-equipment, for R&D investment tax credit

- defined, 127(9)

First-time donor

- defined, 118.1(1)
- super-credit for charitable donations, 118.1(3.1), (3.2)

First-time home buyer

- credit, *see* First-Time Home Buyer’s Credit
- Home Buyer’s Plan eligibility, 146.01(1)“regular eligible amount”(e), (f)

First-Time Home Buyer’s Credit and Disability Home Purchase Credit, 118.05

- amount of credit (\$1,500), 118.05(3)
- apportionment among multiple claimants, 118.05(4)

First-year rule, depreciable property, Reg. 1100(2)–(2.4)

Fiscal period

- business, of, 11(2)
- change of control, on, 249(4)(d)
- deemed end on emigration, 128.1(4)(a.1)
- deemed end where exceeds 365 days, 249(3)(b)
- defined, 249.1
- not to be changed without CRA permission, 249.1(7)

Fiscal period (*cont'd*)

- partnership election to align with corporate partners, 249.1(8)–(11)
- election for non-calendar year, 249.1(4), (5)
- annual income inclusion where election made, 34.1
- late filing, Reg. 600(b.1)
- election on termination of proprietorship, 25
- member of terminated partnership
- election re, 99(2)–(4)
- ending in a taxation year, 249(2)(b)
- reference to, 249(2), (3)

Fiscal year

- of MNE group, defined for country-by-country reporting, 233.8(1)

Fisher, *see* Fishing**Fisherman**, *see also* Fishing

- defined, Reg. 105.1(1)

Fishing

- business
 - ceasing to carry on, 28(4), (5)
 - cash method, 28(1)
 - instalments required, 155
 - loss from, constitutes farm loss, 111(8)“farm loss”A(a)(i)
 - cod compensation, *see* compensation programs (*below*)
 - compensation programs
 - payments received under, taxable, 56(1)(a)(vi), Reg. 5502(c)
 - withholding of tax at source, 153(1)(m), Reg. 5502(c)
 - repayment of benefits, deductible, 60(n)(v)
 - cooperative, small business deduction on sales to, 125(7)“specified cooperative income”
 - defined, 248(1)
 - expedition, by CRA, 231.2(3)
 - family fishing corporation or partnership, *see* Family farm or fishing corporation/partnership
 - income from
 - election re source deductions, Reg. 105.1
 - instalments and payment of balance, 155
 - insurer exempt, 149(1)(t)
 - losses, 111(8)“farm loss”A(a)(i), *see also* Farm loss
 - not eligible for manufacturing & processing credit, 125.1(3)“manufacturing or processing”(a)
 - property
 - *inter vivos*, 73(3)–(4.1)
 - investment tax credit, 127(9)“qualified property”(c)(ii)
 - on death, 70(9)–(9.31)
 - transferred to child
 - when available for use, 13(27)(g)
 - quota, 110.6(1)“qualified fishing property”(d)
 - vessel
 - capital cost allowance, Reg. 1100(1)(i), 1101(2a), Reg. Sch. II:Cl. 7
 - leased to controlled corporation, investment tax credit, 127(9)“qualified property”(d)(iv)

Fishing camps relief (COVID), Reg. 8901.1(2)(b)(xii), *see also* Qualifying tourism or hospitality entity**Fishing charters relief (COVID)**, Reg. 8901.1(2)(b)(vi), *see also* Qualifying tourism or hospitality entity**Fishing expedition**, 231.2(3)**Fitness clubs relief (COVID)**, Reg. 8901.1(2)(b)(ix)(A)(I), *see also* Qualifying tourism or hospitality entity**Fitness credit**, *see* Children’s Fitness Credit (pre-2017)**Five full-time employees**, *see* Six employees test**Fixed interest**, *see also* Specified fixed interest

- defined
- for loss restriction event rules for trusts, 251.2(1)
- for non-resident trust rules, 94(1)

Fixed location fuel cell systems or equipment

- capital cost allowance, Reg. Sch. II:Cl. 43.1(a)(ii.1)

Fixed payment obligation

- defined, Reg. 9100

Flared gas, *see* Solution gas**Flat benefit provision (of pension plan)**

- defined, Reg. 8300(1)

Flood region, *see* Drought or flood region**Floorcovering installer**

- apprenticeship job creation credit, 127(9)“investment tax credit”

Flow-through

- adjusted cost base of option, to share, partnership interest or trust interest, 49(3.01)
- Canadian development expense, to shareholder, 66(12.62)
- Canadian exploration expense, to shareholder, 66(12.6)
- Canadian oil and gas property expense, to shareholder, 66(12.64)
- corporate income to shareholder, *see* Integration
- corporation’s capital gain, untaxed portion, 83(2)
- death benefit, through trust or estate, 104(28)
- entity, *see* Flow-through entity (re capital gains exemption)
- intercorporate dividends, 82(1)(a), (a.1), 112(1)
- investment tax credits on windup, 88(1)(e.3)
- paid-up capital deficiency, on conversion of shares, 51(3), 86(2.1)
- partnership income to partner, 96(1)
 - limited to amount at risk, 96(2.1)–(2.7)
- qualifying environmental trust income to beneficiary, 107.3(1)
- shares, *see* Flow-through shares
- trust capital gains to beneficiary, 104(21)
- trust income to preferred beneficiary, 104(14)
- trust pension benefits to beneficiary, 104(27)

Flow-through entity (re capital gains exemption)

- adjusted cost base, addition to, 53(1)(p)
- amalgamation of, 87(2)(bb.1)
- defined, 39.1(1)
- distribution of property to beneficiary, 107(2.2)
- reduction in capital gain, 39.1(2)–(6)
- sale of interest in, 39.1(7)

Flow-through mining expenditure

- defined, 127(9)
 - reduction for assistance received, 127(11.1)(c.2)
- investment tax credit for, 127(5)(a)(i), 127(9)“investment tax credit”(a.2)
 - carryforward or carryback, 127(9)“investment tax credit”(c)
 - reduces CCEE, 66.1(6)“cumulative Canadian exploration expense”L

Flow-through share class of property

- deemed capital gain on donation of, 40(12)
- defined, 54

Flow-through shares, 66(12.6)–(12.75)

- amalgamation, effect of, 87(4.4)
- COVID-19 extensions, 66(12.6001), (12.731), 211.91(2.1)
- class of property, *see* Flow-through share class of property
- cost of, 66.3(3)
- defined, 66(15), 248(1)
- donation to charity, deemed capital gain, 40(12)
 - capital dividend account impact, 89(1)“capital dividend account”(a)(i)(A), (B.1)
 - subsequent rollover, 38.1
- information return, Reg. 228
- interest on renunciation for previous year, 211.91(1)
- minimum tax, 127.52(1)(e), (e.1)
- mining exploration expenses in first 60 days of year, 66.1(8)
- not “tax shelter”, 237.1(1)
- one-year look-back rule, 66(12.66)(a.1), 211.91
- paid-up capital, 66.3(4)
- prescribed, Reg. 6202.1
- renunciation of, 66(12.6), (12.62), (12.64), 66(12.73)

- Flow-through shares (*cont'd*)
 - Canadian development expenses
 - conversion to CEE before 2019, 66(12.601), (12.602)
 - Canadian exploration expenses, 66(12.6)
 - Canadian oil and gas property expenses, 66(12.64)
 - expenses in first 60 days of the year, 66(12.66)
 - member of partnership, by, 66(19)
 - mining properties excluded, 66(12.62)(b.1)
 - restrictions, 66(12.67), (12.71), (19)
 - selling instrument
 - defined, 66(15)
 - filing of, 66(12.68)
 - late filing, 66(12.74), (12.75)
- Fluctuations in currency**, *see* Foreign exchange
- Fondaction**
 - prescribed as labour-sponsored venture capital corporation, Reg. 6700(f), 6701(g)
- Food**, *see also* Entertainment expenses (and meals); Meals
 - delivered after the end of the year, reserve for, 20(6)
- Food and animal waste**
 - defined, Reg. 1104(13)
- Food waste**
 - defined, Reg. 1104(13) [repealed]
- Football players**, *see* Athlete
- Foreclosure**, *see* Surrender: of property to creditor
- Foreign Account Tax Compliance Act (U.S.)**
 - intergovernmental agreement for exchange of information, *see at end of Canada-U.S. Tax Convention*
 - reporting required by Canadian financial institutions, 263–269
 - information return of accounts held by U.S. persons, 266(1)
 - records to be kept for 6 years, 267(3)
 - U.S. taxpayer identifying number must be provided to financial institution, 162(6)
- Foreign accrual capital loss**
 - application to FAPI, 95(1)“foreign accrual property income”F.1, Reg. 5903.1(1)
 - defined, Reg. 5903.1(3), (4)
- Foreign accrual property income**, *see also* Foreign affiliate
 - banks, rules for, 95(2.31), (2.43)–(2.45), (3.01)
 - contract manufacturing, 95(3.2)
 - currency hedging, 95(2)(g.01)
 - defined, 95(1), 95(2), 248(1)
 - definitions, 95(1), (4)
 - foreign affiliate purchasing goods for use in Canada, 95(2)(a.1)
 - fresh start rule, 95(2)(k)
 - included in income, 91(1)
 - insurance of risks in Canada, 95(2)(a.2)
 - loss carryback, 152(6.1), Reg. 5903(1)(b)
 - loss carryforward, Reg. 5903(1)(a)
 - partnership, of, 93.1(5), (6)
 - partnerships and trusts, 95(3.6)
 - regulated foreign financial institution exception, 95(2.11)
 - stub period, 91(1.1)–(1.5)
 - transparent affiliate, Reg. 5907(1.091), (1.092)
- Foreign accrual property loss**
 - carryback 3 years, Reg. 5903(1)(b)
 - reassessment to permit, 152(6.1)
 - carryforward 20 years, Reg. 5903(1)(a)
 - defined, Reg. 5903(3)
- Foreign accrual tax**
 - deduction from income, 91(4)
 - defined
 - for foreign accrual property income, 95(1)
- Foreign affiliate**, *see also* Controlled foreign affiliate; Foreign accrual property income
 - absorptive merger of, 87(8.2)
 - active business income, 95(2)(a), Reg. 5907(2)–(2.6)
 - acquisition of shares of
 - from partnership, 91(7)
 - assets acquired from
 - as consideration for settlement of debt, 80.1(5)
 - as dividend in kind, 80.1(4)
 - on winding-up, 80.1(6)
 - becoming resident in Canada, 128.1(1)(d)
 - benefit to shareholder from, 15(1)–(7), 90(6)–(15)
 - capital gains
 - election re, Reg. 5902
 - capital gains and losses, 95(2)(f)
 - currency fluctuation, from, 95(2)(g)–(g.02)
 - capital gains of, *see* Exempt surplus (of foreign affiliate); Hybrid surplus (of foreign affiliate); Taxable surplus (of foreign affiliate)
 - capital loss of, *see* Foreign accrual capital loss
 - carrying on business in a country, Reg. 5906
 - consolidated groups’ liabilities, Reg. 5907(1.1)
 - controlled, defined, 95(1)“controlled foreign affiliate”
 - currency dealings of, 95(2.3), (2.5)“indebtedness”
 - deductible loss, 95(1)“foreign accrual property income”F, Reg. 5903
 - defined, 95(1), 248(1)
 - look-through rule for shares held by partnership, 93.1
 - definitions, Reg. 5907
 - disposition of shares of
 - election re capital gains on, 93(1)
 - held by partnership, 93(1.2)
 - loss on, 93(2)–(2.3), (4)
 - share-for-share exchange, 85.1(3)–(6)
 - disposition of shares of another foreign affiliate, 95(2)(c)
 - dissolution of, 88(3)–(3.5), 95(2)(e), Reg. 5905(7)
 - dividends from, 20(13), 113(1), Reg. 5900
 - shares held by partnership, 93.1(2)
 - “earnings” of, defined, Reg. 5907(1)
 - “excluded property”
 - debt related to, gain or loss on settlement of, 95(2)(i)
 - defined, 95(1)
 - “exempt earnings”
 - defined, Reg. 5907(1)
 - listed countries re, Reg. 5907(11)–(11.2)
 - “exempt loss”
 - defined, Reg. 5907(1)
 - listed countries re, Reg. 5907(11)–(11.2)
 - “exempt surplus” defined, Reg. 5907(1)
 - foreign accrual property income of, defined, 95(1)
 - “foreign accrual tax” defined, 95(1)
 - hedge gain, stop-loss rule, 93(2)–(2.31)
 - income bonds or debentures issued by, 95(5)
 - income derived from indebtedness, 95(2)(a.3), 95(2.4), (2.5)“indebtedness”
 - income from services, 95(2)(b)
 - “services” defined, 95(3)
 - information return re, 233.4
 - insurer
 - income of, 95(1)“investment business”, 95(2)(a.2)
 - subject to Canadian rules, 95(2)(k)(iv)
 - investment business of, *see* Investment business
 - liquidation of, 88(3)–(3.5), 95(2)(e), Reg. 5905(7)
 - lower tier liquidation and dissolution, 95(2)(e)
 - loan to, 17(3), 247(7)
 - loan to shareholder by, 15(2)–(2.6), 90(6)–(15)
 - merger of, 87(8), (8.1), 95(2)(d), (d.1)
 - “net earnings” defined, Reg. 5907(1)
 - “net loss” defined, Reg. 5907(1)
 - “net surplus” defined, Reg. 5907(1)
 - participating percentage, Reg. 5904
 - partnership interest
 - adjusted cost base of, 95(2)(j)

Foreign affiliate (*cont'd*)

- qualifying interest in, *see* Qualifying interest (in respect of foreign affiliate)
- regulations, Reg. Part LIX
- “relevant cost base” of property, 95(4)
- “relevant tax factor” defined, 95(1)
- reporting requirements, 233.4
- residence of, Reg. 5907(11.2)
- return of capital, Reg. 5901(2)(b)
- second affiliate, 95(2)(a)(ii)(D)
- settlement of debt, gain or loss from, 95(2)(i)
- share of
 - • adjusted cost base, 92
 - • • amalgamation, on, 87(2)(u)(i)
 - • amount included in income re, 91(1)
 - • • reserve where foreign exchange restriction, 91(2)
 - • disposition of, 85.1(3)–(6)
 - • • held by partnership, 93(1.2)
 - • election re disposition, 93(1), (1.1), (1.11)
 - • • late-filed, 93(5)
 - • • penalty, 93(6)
 - • • special cases, 93(5.1)
 - • • unpaid balance of penalty, 93(7)
 - • exempt dividends, 93(3)
 - • • on amalgamation, 87(2)(u)(ii)
 - • fair market value, ITAR 26(11.1), (11.2)
 - • held by partnership, 93.1(2)
 - • issued to avoid tax, deemed not issued, 95(6)(b)
 - • loss limitation on disposition of, 93(2)–(4)
 - • participating percentage of, defined, 95(1)“participating percentage”
- special rules, Reg. 5905
- start-up rule, for non-active business, 95(2)(k)
- stock dividends from, 95(7)
- surplus distributions
 - • how taxed, 113(1)
 - • order, Reg. 5901
- “surplus entitlement percentage” defined, 95(1)
- tax, *see* Foreign taxes
- “taxable earnings” defined, Reg. 5907(1)
- “taxable loss” defined, Reg. 5907(1)
- “taxable surplus” defined, Reg. 5907(1)
- taxation year, 95(1)
- taxpaying affiliates’ losses, Reg. 5907(1.2)
- third affiliate, 95(2)(a)(ii)(D)
- windup of, distribution of property, 88(3)

Foreign affiliate dumping, 212.3

- corporate emigration, 219.1(2)
- corporate immigration, 128.1(1)(c.3)

Foreign assets

- reporting of, to CRA, 233.3

Foreign bank, *see also* Authorized foreign bank

- defined
 - • re FAPI, 95(1)
- fund deposited with, reporting requirement, 233.3

Foreign-based information or document

- defined, 231.6(1)
- requirement to provide, 231.6(2)
 - • consequence of non-compliance or incomplete compliance, 231.6(8)
 - • notice of, 231.6(3)
 - • review of, 231.6(4)–(6)
 - • time during review not to count, 231.6(7)
- tax shelter investment, effect on, 143.2(13), (14)

Foreign broadcasting undertaking

- defined, 19.1(4)
- no deduction for advertisement broadcast to Canadian market by, 19.1(1)

Foreign business

- defined, for FAPI rules, 95(2)(j.1)(v), 95(2)(k.1)

Foreign business corporation

- deemed resident in Canada, 250(4)(b)
- defined, 213(3)
- no withholding tax on dividend from, 213(1)

Foreign charitable organization

- designation of, for donations to qualify, 149.1(26)

Foreign charity

- qualifying for Canadian donations
 - • charity that received gift from Canada, 149.1(1)“qualified donee”(a)(v), 149.1(26)
 - • US charity, where donor has US-source income, Canada-U.S. Tax Treaty:Art. XXI:7
- US charity, no Canadian tax on, Canada-U.S. Tax Treaty:Art. XXI:1

Foreign corporation, *see* Foreign affiliate; Non-resident**Foreign country**, *see* Foreign government; Foreign investment entity; Prescribed countries**Foreign currency**, *see also* Foreign exchange

- defined, 248(1)
- election to use for tax reporting, 261(3)

Foreign currency debt

- defined, 111(8), 248(1)
- gain or loss on, after change of control, 40(10), (11), 111(12), (13)

Foreign deduction component

- defined, for hybrid mismatch arrangement rules, 18.4(7)(b), 18.4(11)(c), 18.3(13)(c), 18.4(15)(b)

Foreign divisive reorganization

- effect on shareholders, 15(1.5)

Foreign exchange, *see also* Foreign currency

- adjustment, re specified debt obligation, Reg. 9104
- calculating currency defined, 95(1)
- calculation of income where foreign assets expropriated, 80.1(8)
- change of control of corporation, effect of, 111(12), (13)
- debt obligation denominated in
 - • application of debt forgiveness rules, 80(2)(k), 80.01(11)
 - • assumed by non-resident in Canadian business, 76.1(2)
 - • moved by non-resident from Canadian business, 76.1(1)
 - • surrender of property to creditor, calculation of proceeds, 79(7)
- exchange rate defined, 111(8), 248(1)
- fluctuations in
 - • capital gain or loss, 39(1.1), (2)
 - • debt parking and statute-barred debt rules to be ignored, 80.01(11)
 - • foreign affiliate’s capital gain or loss from, 95(2)(g)–(g.02)
 - • ignored in determining employee stock option deduction, 110(1)(d)(iii)
 - • loan or lending asset, 248(1)“amortized cost”(c.1), (f.1)
 - • revenue to real estate investment trust, 122.1(1.3)
 - • specified debt obligation of financial institution, 142.4(1)“tax basis”(f), (o)
- income in blocked currency, waiver of interest on tax, 161(6)
- restriction, reserve where, 91(2), (3)

Foreign expense restriction rule

- defined, for hybrid mismatch arrangement rules, 18.4(1), 113(3)

Foreign exploration and development expenses, *see also* Exploration and development expenses; Resource expenses

- borrowed money
 - • capitalization of interest, 21(2), (4)
 - • • reassessment, 21(5)
- country-by-country allocation, 66(4.1), (4.2)
- successor rules, 66.7(2.1), (2.2)
- deduction for, 66(4)

- Foreign exploration and development expenses (*cont'd*)
 - short taxation year, 66(13.1)
 - defined, 66(15)
 - individual ceasing to be resident in Canada, 66(4.3)
 - limitation, 66(12.4)
 - reduction of, on debt forgiveness, 80(8)(e)
 - short taxation year, 66(13.1)
 - specified, *see* Specified foreign exploration and development expense
 - successor corporation, rules, 66.7(2)
 - application, 66.6(1)
- Foreign government**, *see also* United States
 - bonds of, eligible for RRSP investment, 204“qualified investment”(c.1) (formerly Reg. 4900(1)(o))
 - bribery of officials non-deductible, 67.5
 - diplomats, exempt, 149(1)(a), Canada-U.S. Tax Treaty:Art. XXVIII
 - employees of, exempt, 149(1)(a), Canada-U.S. Tax Treaty:Art. XIX, XXVIII
 - expropriation by, 80.1
 - social security plan of, excluded from RCA, Reg. 6802(g)
 - stock exchanges recognized, 262
 - tax paid to, *see* Foreign tax credit; Foreign taxes
- Foreign hybrid mismatch rule**
 - defined, for hybrid mismatch arrangement rules, 18.4(1)
- Foreign immigration trust**, *see* Immigration trust
- Foreign income**, *see also* Foreign accrual property income
 - Canadian resident, generally taxable, 3(a)
 - employment, tax credit for (pre-2016), 122.3
 - foreign affiliate, of, *see* Foreign accrual property income
 - non-resident, not taxable, 115(1)
 - taxed by foreign country, *see* Foreign tax credit
- Foreign insurance subsidiary**
 - defined, Reg. 8605(4)
- Foreign investment entity**, 94.1–94.4 [former draft, not implemented]
- Foreign investment income**
 - defined, 129(4)
 - refund to private corporation in respect of, 129(1), (3)
- Foreign merger**
 - absorptive merger, 87(8.2)
 - defined, 87(8.1)
 - effect of, 87(8)
 - taxable Canadian property rollover, 87(8.4), (8.5)
- Foreign Missions and International Organizations Act**
 - employment income from international organization, tax credit, 126(3)
- Foreign mutual fund trust**
 - exemption from reporting requirement, 233.2(1)“exempt trust”(c)
 - reporting requirement, 233.3
- Foreign non-profit organization**
 - defined, Reg. 6804(1)
- Foreign oil and gas business**
 - defined
 - for foreign tax credit, 126(7)
 - for FAPI, Reg. 5910(4)
 - foreign tax credit for, 126(5)
- Foreign ordinary income**
 - defined, for hybrid mismatch arrangement rules, 18.4(1), 18.4(8)
- Foreign plan (pension plan)**
 - contributions made to, Reg. 6804(4)–(6)
 - defined, Reg. 6804(1), 8308.1(1)
 - electing employer with respect to, Reg. 6804(2), (3)
 - PSPA of, Reg. 8308.1(5), (6)
 - information return, Reg. 8402(2)
 - pension adjustment, prescribed amount, Reg. 8308.2
 - pension credit of, Reg. 8308.1(2)–(4)
- Foreign policy loan**
 - defined, Reg. 2400(1)
- Foreign policy pool**
 - defined, for FAPI on insurance swaps, 95(2)(a.21)
- Foreign property**, *see also* Foreign reporting requirements
 - investments in, annual information return, 233.3
 - sale of, expropriation assets for, 80.1
- Foreign reporting requirements**, 233.1–233.7
 - foreign affiliates, 233.4
 - foreign property, 233.3
 - reassessment deadline extended if return not filed accurately, 152(4)(b.2)
 - foreign trusts
 - distributions from, 233.5
 - indebtedness to, 233.5
 - transfer of property to, 233.3
 - transactions with related non-residents, 233.1
- Foreign resource expenses**
 - defined, 66.21(1)
 - reduction of, on change of control, 66.7(13)
 - specified amount of, for successor rules, 66.7(13.2)
 - successor of, 66.7(2.3), (13.1)
- Foreign resource income**
 - defined, 66.21(1)
- Foreign resource loss**
 - defined, 66.21(1)
- Foreign resource pool expense**
 - deduction against taxable income earned in Canada, 115(4.1)
 - defined, 248(1)
- Foreign resource property**
 - acquisition of, rules, 66.7(8)
 - amount designated re
 - “outlay” or “expense”, 66(15)
 - defined, 66(15), 248(1)
 - disposal of, effect on successor rules, 66.7(15)
 - disposition of, 59(1)
 - by partnership, 59(1.1)
 - no capital gain, 39(1)(a)(ii.1)
 - no capital loss, 39(1)(b)(ii)
 - “eligible property” for transfer to corporation by shareholder, 85(1.1)(d)
 - eligibility for section 85 rollover, 85(1.11)(a)
 - in respect of a country, defined, 248(1)
 - non-successor acquisitions, 66.7(16)
 - original owner, defined, 66(15)
 - predecessor owner, defined, 66(15)
 - proceeds of disposition, 59(1)
 - production from, defined, 66(15)“production”
 - reserve amount, defined, 66(15)
 - rules for trusts, 104(5.2)
 - seizure of, exception to creditor rules, 79.1(2.1)
 - successor rules, 66.7(15)
- Foreign retirement arrangement**
 - amount credited to, exempt, 81(1)(r)
 - benefit to trust, flow-through to beneficiary, 104(27)
 - defined, 248(1), Reg. 6803
 - eligible amount, 60.01
 - emigration of retiree, no deemed disposition, 128.1(10)“excluded right or interest”(a)(x)
 - excluded from reporting requirements, 233.2(1)“exempt trust”(a), 233.3(1)“specified foreign property”(n), 233.5(2)(a)
 - excluded from various trust rules, 108(1)“trust”(a)
 - income earned in account, exempt, 81(1)(r)
 - Individual Retirement Account (U.S.), Reg. 6803
 - lump-sum transfer, 60(j)(ii), 60.01

Foreign retirement arrangement (*cont'd*)

- payment out of
 - eligible for transfer to RRSP, 60(j)(ii), 60.01
 - included in income, 56(1)(a)(i)(C.1)
- prescribed plan or arrangement, Reg. 6803

Foreign service

- for registered pension plan
 - determination of provisional PSPA, Reg. 8303(10)
 - eligibility, 8503(3)(a)(vii)

Foreign share

- rollover on exchange for foreign share, 85.1(5), (6)

Foreign spin-off, 86.1

- foreign accrual property income, 95(2)(g.2)
- prescribed distribution, Reg. 5600

Foreign stock exchange index units

- prescribed distribution, Reg. 5600
- qualified for deferred income plans, Reg. 4900(1)(n.1)

Foreign stock exchanges, 262**Foreign tax credit**, 126

- addition to taxable income in respect of, 110.5
- change in, reassessment within 6 years, 152(4)(b)(iii)
- deduction for specified capital gains, and, 126(5.1)
- deduction from income, 20(11), (12), (12.1), 91(4)
- deduction from tax, 126
 - calculated separately for each foreign country, 126(6)
 - definitions, 126(7)
 - emigrant, 126(2.21)
 - non-resident, re pre-Oct/96 disposition, 126(2.2)
 - trust with non-resident beneficiary, 126(2.22)
- deemed tax on income or profits, 126(5)
- definitions, 126(7)
- employees profit sharing plan, deduction, 144(8.1)
- foreign oil and gas levies, 126(5)
- former resident, 126(2.21)
 - trust beneficiary, 126(2.22)
- minimum tax, 127.54
- no economic profit, 20(12.1), 126(4.1)
- non-business income tax, 20(12)
- not deductible by life insurer, 138(5.1), (8)
- overseas employment tax credit and, choice between, 126(1)(b)(i)
- payable, adjustment, 161(6.1)
- portion of foreign tax excluded, 126(4)
- profit not material, 20(12.1), 126(4.1)
- short-term securities acquisitions, 126(4.2), (4.3)
- special, for minimum tax purposes, 127.54
- tax deemed income or profits tax, 126(5)
- trust, deduction for, 104(22)–(22.4)
- U.S. estate taxes, Canada-U.S. Tax Treaty:Art. XXIX-B:6, (7)
- unused
 - carryover on amalgamation, 87(2)(z)
 - defined, 126(7)“unused foreign tax credit”
 - overpayment of tax as consequence of, 164(5), (5.1)
 - reassessment, 152(6)(c.1)
 - rules re, 126(2.3)

Foreign taxation year

- defined, for hybrid mismatch arrangement rules, 18.4(1)

Foreign taxes

- additional, or reimbursement of
 - reassessment within 6 years, 152(4)(b)(iv)
- credit for, *see* Foreign tax credit
- deduction for, 20(11), (12), (12.1)

Foreign trust, *see* Offshore trust; Trust (or estate): non-resident**Forest**

- access road, capital cost allowance, Reg. Sch. II:Cl. 10(p)
- management plan, prescribed, Reg. 7400

Forestry professional, recognized, Reg. 7400(2)**Forestry Revitalization Trust**

- remission of tax payable on, *British Columbia Forestry Revitalization Remission Order*

Forfeited amount

- defined, 147(1), Reg. 8500(1)

Forfeiture

- under deferred profit sharing plan, 201

Forgiven amount (re settlement of debt)

- deemed where amount designated following debt forgiveness, 80.03(7)(b)(ii)
- defined, 15(1.21), 80(1), 80.01(1), 80.03(1), 80.04(1)
- transfer of, under agreement, 80.04(4)

Forgiveness of debt, *see* Debt forgiveness**Form(s)**

- prescribed or authorized
 - defined, 248(1)“prescribed”
 - deviations acceptable, *Interpretation Act* s. 32
 - proof of, 244(16)
 - waiver of requirement to file, 220(3.1)

Former Act (pre-1972), references to

- defined, ITAR 8

Former business property

- amalgamation, effect of, 87(2)(1.3)
- defined, 248(1)
- disposition of, 44(1), (6)

Former employee

- amount received from employer, whether taxable, 6(3)
- of predecessor employer, for pension plan rules, 147.2(8)
- stock option agreement, taxable benefit, 7(4)

Former limit

- defined, 147.1(1)

Former limited-recourse indebtedness (tax shelter investment)

- defined, 143.2(10)

Former property, *see also* Exchanges of property; Former business property

- defined, 13(4), 44(1)

Former resident, *see also* Ceasing to be resident in Canada

- credit for tax paid on emigration where stop-loss rule applies, 119
 - reassessment to permit credit, 152(6.3)
- foreign tax credit, 126(2.21), (2.22)
- returning to Canada, 128.1(6), (7)
- stop-loss credit, 119
 - reassessment to permit credit, 152(6.3)

Former spouse, defined, 252(3)**Formulas**

- negative amounts in, 257

Forward averaging, *see also* Averaging of income; Income-averaging annuity contract

- addition to tax, 120.1(2) [repealed]
- election, 110.4(2) [repealed]

Forward purchase or sale agreement

- deemed to be eligible derivative subject to mark-to-market election, 10.1(4)
- excluded from inventory writedown, 10(15), 18(1)(x)
- straddle transaction restrictions, 18(17)“position”(a)(vi), 18(9)

Forward rate agreement

- deemed to be eligible derivative subject to mark-to-market election, 10.1(4)
- excluded from inventory writedown, 10(15), 18(1)(x)
- straddle transaction restrictions, 18(17)“position”(a)(vi), 18(9)

Fossil fuel

- defined, Reg. 1104(13)

Fossilized shellfish, *see* Ammonite gemstone**Foster child**

- payment relating to, exempt, 81(1)(h)

Foster's-Treasury Wine spinoff, Reg. 5600(e)

Foundation, *see* Charitable foundation; Private foundation; Public foundation

Fractional share

- cash received for by trust, 107.4(2.1)
- is a share, 248(1)“share”

France, *see also* Foreign government

- stock exchange recognized, 262
- universities, gifts to, Reg. Sch. VIII, s. 3

Franchise

- capital cost allowance, Reg. 1100(1)(c), Reg. Sch. II:Cl. 14
- payment to U.S. resident on connection with, Canada-U.S. Tax Treaty:Art. XII:3(c)
- relationship not considered control, 256(5.1)
- representation expenses, 13(12), 20(1)(cc), 20(9)

Fraser Papers Inc.

- pension underfunding trust, Reg. 6802(h)(ii), 8502(b)(v.1)

Fraternal benefit society/order

- exemption, 149(1)(k)

Fraud, justification for reassessment, 152(4)(a)(i), 152(5)

Fraudulent conveyance

- tax equivalent to provincial legislation, 160

Fredette case overruled, 34.2, 245(4)

Freedom of information, 241(1) (Notes)

Freight haulage trucks and tractors

- capital cost allowance, Reg. Sch. II:Cl. 16(g)

Fresh-start date

- defined, for donation of flow-through shares, 54

Freshwater Fish Marketing Corporation, subject to tax, 27(2), Reg. 7100

Friesen case overruled, 10(1.01)

Frivolity penalty

- where appeal filed to delay payment, 179.1

Frontier exploration

- allowances, Reg. 1207
- prescribed area, Reg. 1215

Frontier exploration base

- defined, Reg. 1207(2)
- expenses added to
 - amounts receivable, portion included in income, 59(3.3)(e)

Fruit growing, constitutes farming, 248(1)“farming”

Fuel

- production of, 66(15)“principal-business corporation”(h)

Fuel cell systems

- fixed-location, capital cost allowance, Reg. Sch. II:Cl. 43.1(a)(ii.1), Sch. II:Cl. 43.1(d)(xii)

Fuel tax rebate (1992–1999)

- 10 × inclusion, 12(1)(x.1)
- abatement of prior years' losses, 111(10), (11)
- amalgamation, on, 87(2)(uu)
- interest on prior year's return not to be paid, 161(7)(a)(viii)
- windup, on, 88(1)(e.2)

Fuel upgrading equipment

- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(ix), Sch. II:Cl. 43.2(b)

Full-rate taxable income

- defined, 123.4(1)

Full-time student

- defined, for Lifelong Learning Plan, 146.02(1)

Fully collateralized arrangement

- defined, 248(1)

Fully exempt interest

- defined, 212(3)
- exempt from non-resident withholding tax, 212(1)(b)(i)

Functional currency

- defined, 261(1)
- election to use, 261(3), (5)
- electronic filing not required, Reg. 205.1(2)(c)
- rules, 261

Functional currency year

- defined, for functional currency rules, 261(1)

Fund value benefit

- under life insurance policy, defined, Reg. 310, 1401(3)

Fund value of a coverage

- under life insurance policy, defined, Reg. 310, 1401(3)

Fund value of a policy

- defined, Reg. 1401(3)

Funder

- defined, for back-to-back shareholder loan rules, 15(2.192)

Funding arrangement

- defined, for back-to-back shareholder loan rules, 15(2.192)

Funds

- defined, for electronic funds transfer reporting, 244.1

Funeral or cemetery services, *see also* Eligible funeral arrangement

- defined, 148.1(1)
- provision of under eligible funeral arrangement, 148.1(2)(b)(i)

Funeral services, *see also* Eligible funeral arrangement

- defined, 148.1(1)
- provision of under eligible funeral arrangement, 148.1(2)(b)(i)

Fur farming, 248(1)“farming”

Furnace

- electric or sealed combustion, medical expense credit, Reg. 5700(c.2)

Furniture

- antique, whether CCA allowed, Reg. 1102(1)(e)
- capital cost allowance, Reg. Sch. II:Cl. 8(i)

Future benefits to be provided

- under life insurance policy, defined, Reg. 1401(3)

Future net premiums or cost of insurance charges

- re life insurance policy coverage, defined, Reg. 1401(3)

Future premiums or cost of insurance charges

- re life insurance policy coverage, defined, Reg. 1401(3)

Future obligations, *see also* Reserve

- deduction for amount paid, 20(24)

Futures agreement

- deemed to be eligible derivative subject to mark-to-market election, 10.1(4)
- excluded from inventory writedown, 10(15), 18(1)(x)
- straddle transaction restrictions, 18(17)“position”(a)(vi), 18(9)

G

GAAP, *see* Generally accepted accounting principles

GAAR, *see* General anti-avoidance rule

GILTI, *see* United States: global intangible low-taxed income

GIS, *see* Guaranteed Income Supplement, included in income

GRE, *see* Graduated rate estate

GRIP, *see* General rate income pool

GSRA, *see* Government-sponsored retirement arrangement

GST, *see* Goods and services tax (GST)

GST/HST Credit, *see* Goods and services tax: refundable credit

Gagnon case overruled, 56(12)

Gains, *see also* Capital gain; Capital loss; Capital gains and losses

- defined, for disposition of specified debt obligation, Reg. 9200

Gala presentation

- ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(v)

- Gala presentation (*cont'd*)
 - ineligible for film/video production services credit, Reg. 9300(2)(e)
- Gallantry Awards Order Statute**
 - amount received under, exempt, 81(1)(d)
- Gambling losses, Canada-U.S. Tax Treaty:Art. XXII:3**
- Game show**
 - ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(iii)
 - ineligible for film/video production services credit, Reg. 9300(2)(c)
- Garnishment for taxes unpaid, 224**
 - binding on federal and provincial governments, 224(1.4)
 - enhanced, 224(1.2)
 - failure to comply with order, 224(4), (4.1)
 - prevented while objection or appeal underway, 225.1
 - salary or wages, 224(1)
 - “super” garnishment priority over secured creditors, 224(1.2)
- Garry Bowl Ltd. case overruled, 152(1.1)**
- Gas, natural, see Petroleum/natural gas**
- Gas manufacturing/distributing equipment**
 - capital cost allowance, Reg. Sch. II:Cl. 1(n), Sch. II:Cl. 2(d)
- Gas or oil well equipment, Reg. 1104(2), Reg. Sch. II:Cl. 10(j)**
- Gaseous biofuel**
 - defined, Reg. 1104(13)
- Gasoline expense**
 - automobile, *see* Automobile: operating costs
- Gaspé Peninsula**
 - defined, 127(9)
 - prescribed area, for electrical energy or steam processing, 127(9)“qualified property”(c.1)
 - prescribed designated region, 127(9)“specified percentage”(a)(vi), Reg. 4607
 - qualified property acquired for use in, 127(9)“specified percentage”(a), (e)
- Gay couples, see Common-law partner**
- Gemstones, see also Listed personal property**
 - ammonite, *see* Ammonite gemstone
- General amending provision**
 - of insurance policy, defined, Reg. 1408(1)
- General anti-avoidance rule, 245**
 - application of rule, 245(2), (4)
 - application to tax treaties, 245(4)(a)(iv), *Income Tax Conventions Interpretation Act* s. 4.1
 - avoidance transaction, defined, 245(3)
 - determination of amounts following assessment, 152(1.11), (1.12)
 - determination of tax consequences, 245(5)
 - tax benefit, defined, 245(1)
 - tax consequences, defined, 245(1)
 - transfer pricing GAAR test, 247(2)(b)(ii)
- General corporate income tax rate**
 - defined, for provincial SIFT tax rate, Reg. 414(1)
- General Motors of Canada Limited**
 - payments to, exception to employee life and health trust rules, Reg. 9500
- General procedure appeals, 175**
- General provisions**
 - defined, Reg. 8006
- General-purpose electronic dataprocessing equipment**
 - capital cost allowance, Reg. Sch. II:Cl. 50
 - defined, Reg. 1104(2)
- General rate factor**
 - defined, for GRIP calculation, 89(1)
- General rate income pool**
 - after amalgamation, 87(2)(vv), 89(5)
 - after windup, 89(6), 88(1)(e.2)
 - defined, 89(1), 248(1)
 - addition for 2006, 89(7)
 - addition on amalgamation, 89(5), 87(2)(vv)
 - addition on becoming CCPC, 89(4)
 - addition on windup, 89(6), 88(1)(e.2)(ix), 87(2)(vv)
 - dividend paid from, 89(1)“eligible dividend”, “excessive eligible dividend designation”
- General rate reduction percentage**
 - defined, 123.4(1)
 - application to manufacturing & processing credit, 125.1(1), (2)
- Generally accepted accounting principles**
 - in computing income from business or property, 9(1)
 - in determining adjusted equity, 20.2(2)
 - modified for foreign bank branches, 20.2(1)“branch financial statements”
- Generating electrical energy**
 - manufacturing and processing credit, 125.1(2)
- Generating equipment**
 - capital cost allowance, Reg. 1100(1)(t), (ta), Reg. Sch. II:Cl. 1(k), Sch. II:Cl. 1(m), Sch. II:Cl. 2(a), Sch. II:Cl. 2(c), Sch. II:Cl. 8(f), Sch. II:Cl. 8(g), Sch. II:Cl. 9(a), Sch. II:Cl. 9(e), Sch. II:Cl. 9(f), Sch. II:Cl. 17(a.1), Sch. II:Cl. 29
- Genstar trusts**
 - anti-avoidance rule, 104(7.1)
- Geothermal energy projects**
 - Canadian renewable and conservation expense, Reg. 1219(1)(f)(ii), 1219(1)(h)
 - clean-energy CCA, Reg. Sch. II:Cl. 43.1(d)(viii)
 - compliance required with environmental law, Reg. 1104(17), 1219(5)
- Germany, see also Foreign government**
 - compensation paid by, exempt, 81(1)(g)
 - stock exchange recognized, 262
 - universities, gifts to, Reg. Sch. VIII, s. 11
- Gift**
 - attribution of income from gifted property, 74.1, 74.2
 - by employer to employee, taxable, 6(1)(a), 6(3)
 - by person with tax debt, recipient liable, 160
 - capital gain on property given, 69(1)(b)(ii)
 - charitable, *see* Gifts and donations (charitable)
 - deemed disposition at fair market value, 69(1)(b)(ii)
 - employer to employee, whether taxable, 6(1)(a) Notes
 - political party or candidate, *see* Political contribution
- Gifting arrangement**
 - collection of half of tax in dispute, 164(1.1)(d)(iii)(B), 225.1(7)
 - constitutes tax shelter, 237.1(1)“tax shelter”
 - defined, 237.1(1)
- Gifts and donations (charitable)**
 - art created by the donor, 118.1(7), (7.1)
 - art flips
 - donation valued at cost of art, 248(35)–(38)
 - no minimum \$1,000 cost, 46(5)
 - subject to tax shelter rules, 237.1(1)“gifting arrangement”, “tax shelter”
 - capital dividend account, effect on, 89(1)“capital dividend account”(a)(i)(A)
 - capital property, of, election for lower proceeds, 110.1(3), 118.1(6)
 - carryback from year of death, 118.1(4)
 - carryforward
 - credit, 118.1(1)“total charitable gifts”
 - deduction to corporation, 110.1(1)(a)
 - charitable, *see also* Charity; Qualified donee
 - after donation of real estate or private company shares, 38(a.4), 38.3, 38.4 (abandoned)
 - by corporation, 110.1(1)(a)
 - by individual, 118.1(1)“total charitable gifts”, 118.1(3)

- Gifts and donations (charitable) (*cont'd*)
- collection of half of tax in dispute, 164(1.1)(d)(ii)(B), 225.1(7)
 - commuter's, 118.1(9)
 - corporate, deduction for, 110.1(1)(a)
 - gifts of property, limitation on fair market value, 248(35)–(38)
 - listed securities, no capital gain, 38(a.1)
 - partnership interests exchangeable for, 38(a.3)
 - total, 118.1(1)
 - corporation, by
 - amalgamation, effect of, 87(2)(v)
 - capital property, election for lower proceeds, 110.1(2.1), (3)
 - deduction for, 110.1(1)
 - partnership, made by, 110.1(4)
 - proof of, 110.1(2)
 - winding-up, claim by parent, 88(1)(e.6)
 - Crown, to, 118.1(1)“total charitable gifts”(a), 149.1(1)“qualified donee”(d)
 - cultural, 110.1(1)(c), 118.1(1)
 - deduction from tax, 118.1(3)
 - deemed disposition at fair market value, 69(1)(b)(ii)
 - ecologically sensitive land, 110.1(1)(d), 118.1(1)“total ecological gifts”
 - easement, servitude or covenant, value of, 110.1(5), 118.1(12)
 - valuation applies for capital gains purposes, 43(2)
 - first-time donor super credit, 118.1(3.1)
 - flow-through shares, deemed capital gain, 40(12)
 - capital dividend account impact, 89(1)“capital dividend account”(a)(i)(A), (B.1)
 - subsequent rollover, 38.1
 - gratuities, taxable as employment income, 5(1)
 - institutions, to, 110.1(1)(c)
 - insurance proceeds, direct designation, 118.1(5.2)(a)
 - member of religious order vowing perpetual poverty, 110(2)
 - municipality, to, 149.1(1)“qualified donee”(a)(ii)
 - non-qualifying security, credit disallowed, 118.1(13)–(13.3)
 - ordering of claims for donations
 - credits, 118.1(2.1)
 - deductions (corporation), 110.1(1.1)(b)
 - partnership, made by, 110.1(4), 118.1(8)
 - proof of, required, 118.1(2)
 - property, of, 69(1)(b), (c)
 - valued at cost, 248(35)–(38)
 - RRSP or RRIF, direct designation, 118.1(5.2)(b)
 - reassessment, 152(6)(c)
 - receipts for, Reg. 3501
 - returned to donor, donation denied
 - corporate donor, 110.1(14)–(17)
 - individual donor, 118.1(25)–(28)
 - information return details, Reg. 3501.1
 - shares, publicly traded, 38(a.1)
 - partnership interests exchangeable for, 38(a.3)
 - TFSA, direct designation, 118.1(5.2)(b)
 - tax shelter, 237.1(1)“gifting arrangement”, “tax shelter”
 - collection of half of tax in dispute, 164(1.1)(d)(ii)(B), 225.1(7)
 - total, 118.1(1)
 - United States charities, 118.1(9); Canada-U.S. Tax Treaty:Art. XXI:7
 - will, by, 118.1(5) [before 2016], 118.1(5.1) [after 2016]
 - publicly traded securities, reduced capital gain, 38(a.1)(ii)
 - windup, on, 88(1)(e.6)
- Gladwin Realty case para. 47 overruled**, 245(1)“tax benefit”(c)
- Glasses, as medical expense**, 118.2(2)(j)
- Glazier**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Global foreign expenses**
- defined, for resource expenses of limited partner, 66.8(1)(a)(i)(D)
- Global foreign resource limit**
- defined, 66.21(1)
- Gluten-free food costs, medical expense credit**, 118.2(2)(r)
- Goats**, 80.3(1)“breeding animals”
- Gold**, *see* Precious metals
- Golf course**
- expense not allowed, 18(1)(l)
 - no COVID extended tourism relief, Reg. 8901.1(2)(b)(ix)(B)
- Goods**, *see also* Property
- to be delivered
 - amounts received for, income, 12(1)(a)(i)
 - repayment of, deductible, 20(1)(m.2)
 - undelivered, reserve for, 20(1)(m)
- Goods and services tax (GST)**, *see also Excise Tax Act*
- change of use, timing rule for GST liability, 248(15)
 - credit, *see* refundable credit (*below*)
 - defined, 248(1)
 - employee benefits
 - GST included in taxable benefit, 6(7)
 - rebate included in income, 6(8)
 - home purchase, excluded from moving expenses, 62(3)(f)
 - input tax credit
 - deemed to be assistance, 248(16), *see also* Assistance/government assistance
 - repaid, deemed to be reduction in assistance, 248(18)
 - interest on arrears, non-deductible, 18(1)(t)
 - interest on refunds, taxable, 12(1)(c)
 - penalty
 - gross-negligence penalty non-deductible, 67.6
 - ordinary penalty deductible, Reg. 7309
 - rebate for employees and partners, *Excise Tax Act* s. 253
 - deemed not to be reimbursement, 8(11)
 - deemed to be assistance, 248(16), *see also* Assistance/government assistance
 - included in income, 6(8), 12(1)(x)
 - reduces capital cost of property, 6(8), 13(7.1)
 - rebate, not paid until all income tax returns filed, *Excise Tax Act* s. 263.02
 - refund, not paid until all income tax returns filed, *Excise Tax Act* s. 229(2)
 - refundable credit, 122.5
 - “adjusted income” defined, 122.5(1)
 - advance payment, 122.5(3.1), (3.2)
 - amount of credit, 122.5(3)
 - applied to tax liability, timing, 164(2.1)
 - determination by Minister, 152(1)(b)
 - “eligible individual” defined, 122.5(1)
 - limit to one per family, 122.5(5)
 - overpayment not to require interest, 160.1(1)
 - penalty for false statement, 163(2)(c.1)
 - prisoners ineligible, 122.5(2)(b)
 - “qualified relation”
 - defined, 122.5(1)
 - jointly liable for repayment of excess, 160.1(1.1)
 - repayment where excess credit paid, 160.1(1.1)
 - restrictions, 122.5(2), (5)
 - returns to be filed before income tax refund paid, 164(2.01)
 - shareholder benefits
 - GST included in taxable benefit, 15(1.3)
 - transfer of income tax instalments or payments to GST account, 221.2(2)
- Goodwill**
- 2016 and earlier (eligible capital property), 14 [repealed]; 20(1)(b) Notes
 - 2017 and later

Goodwill (*cont'd*)

- acquisition of, 13(34)(b), 13(35)
- CCA class, Reg. Sch. II:Cl. 14.1
- capital cost allowance, Reg. 1100(1)(a)(xii.1), 1100(1)(c.1)
- disposition of, 13(34)(c), (d), 13(37), (39)
- included in “property”, 248(1)“property”(e)
- pre-2017, Reg. Sch. II:Cl. 14.1
- rules for, 13(34)–(42)
- transitional rules from eligible capital property, 13(38)–(41)
- exempt gains balance from 1994 capital gains exemption, 40(15), (16)
- pre-1988 ECP, 40(13), (14)

Goodwill amount

- defined, for restrictive-covenant rules, 56.4(1)

Governing plan

- defined, Reg. 4901(2)

Government, *see also* Crown; Crown corporation

- administration of income tax, *see* Minister (of National Revenue); Canada Revenue Agency
- agreements
 - for tax transfer payments (federal-provincial), 154
 - with other countries, *see* Tax treaty
- assistance, *see* Assistance/government assistance
- bonds (and similar obligations)
 - Canada Savings Bonds, cash bonus, 12.1
 - “investment property” for deposit insurance corporation, 137.1(5)“investment property”(a)
 - issued at a discount, 16(3)
 - no non-resident withholding tax, 212(1)(b)(ii)(C)
- bound
 - by deemed trust for tax withheld, 227(4.3)
 - by garnishment orders, 224(1.4)
 - by regulations requiring information returns, 221(3)
 - by withholding tax requirements, 227(11)
- communication of confidential information to, 241(4)
- contract payments, information return, Reg. 237
- donation to, 149.1(1)“qualified donee”(d)
 - by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
- employees abroad, deemed resident, 250(1)(b)–(f)
- foreign, *see* Foreign government
- gifts to, *see* donation to (above)
- grant, *see also* Assistance/government assistance
 - acquisition of depreciable property, towards, 13(7.1), (7.2)
 - cost base of property acquired, 53(2)(k)
 - energy conversion, 12(1)(u), 56(1)(s), *see also* Energy: conversion grant
 - home insulation, 12(1)(u), 56(1)(s), *see also* Home insulation grant
 - prescribed programs, under, 56(1)(s)
- Her Majesty, defined, *Interpretation Act* 35(1)
- international development assistance program, *see* Canadian International Development Agency
- lobbying, *see* Representation expenses
- obligation issued at discount by, 16(2), (3)
- officials, bribery of, no deduction, 67.5
- privatization of assets, debt qualifies for deferred income plans, Reg. 4900(1)(q)
- provincial, *see* Province
- public body performing function of, exempt, 149(1)(c)
- reporting of contract payments, Reg. 237
- representation, *see* Representation expenses
- rights from before 1972, transitional rules, ITAR 21
- -sponsored retirement arrangement, Reg. 8308.4
 - excluded from registered pension plan eligibility, Reg. 8502(m)
 - information return, Reg. 8402.1
- support payments for farmers, information slips, Reg. 234–236
- volunteer emergency worker’s allowance paid by
 - exemption for, 81(4)

Government entity

- defined, re disclosure of taxpayer information, 241(10)

Government of a country other than Canada

- defined, for foreign tax credit, 126(6)

Government payer

- defined, Reg. 234(1)

Government-sponsored retirement arrangement

- defined, Reg. 8308.4(1)
- information return, Reg. 8402.1
- prescribed reduction in RRSP limit, Reg. 8308.4(2)

Governmental entity

- defined, for Common Reporting Standard, 270(1)

Governor General in Council

- defined, *Interpretation Act* 35(1)

Governor General (of Canada)

- defined, *Interpretation Act* 35(1)
- salary taxable, 81(1)(n)

Grace period to pay balance, no additional interest, 161.2**Graduated rate estate**

- alternative minimum tax \$40,000 deduction available, 127.51:C
- defined, 248(1)
- exempt from Part XII.2 tax, 210(2)(a)
- graduated tax brackets apply, 117(2), 122(1)
- instalments not required, 156.1(2)(c)
- investment tax credits available to beneficiaries, 127(7)
- late assessment allowed to reduce tax, 152(4.2), 164(1.5)
- objection deadline extended during first year after filing, 165(1)(a)
- taxation year may be non-calendar year, 249(1)(b)
- treated as personal trust, 248(1)“personal trust”(a), 249(4.1)

Grain

- defined, 76(5)
- delivered, amount due deemed not income debt, 76(4)

Grain elevator operators

- taxable income earned in a province, Reg. 408

Grain storage facilities

- capital cost allowance, additional, Reg. 1100(1)(sb)

Grandchild

- dependent, 118(6)(a)
- financially dependent, *see* Child: financially dependent
- treated as child, *see* Child: extended meaning of

Grandfathered plan (registered pension plan)

- complying before March 1996 budget, Reg. 8509(13)
- defined, Reg. 8500(1)

Grandfathered share

- defined, 248(1)
- dividend on, where deemed to be interest, 258(3)(b)(i)
- excluded from definition of “short-term preferred share”, 248(1)
- excluded from definition of “taxable preferred share”, 248(1)
- excluded from restriction on dividend deductibility, 112(2.21)(b)
- may be a taxable RFI share, 248(1)“taxable RFI share”
- Part VI.1 tax, excluded from, 191(2)(b)(iii), 191.1(2)(b), 191.1(4)(b)
- share exchanged for, excluded from Part IV.1 tax, 187.3(2)

Grandfathering, *see also* Grandfathered share; Transitional rules

- Canadian newspaper, 19(7)
- passive partnership interest acquired before Feb. 22/94, 40(3.1), (3.15)–(3.18)
- RESP investments, 146.1(1)“qualified investment”(d)
- RRSP, RRIF, RESP and RDSP prohibited investments, 207.01(1)“transitional prohibited investment benefit”, 207.01(7)
- taxable Canadian property only since April 26/95, prorating of gain, 40(9)

- Grandfathering (*cont'd*)
 - trust established before June 18/71, low tax rates, 122(2)
- Grandparent**
 - care by, social assistance for, *see* Kinship care, social assistance for
 - dependent, 118(6)(b)
 - includes in-law or in common-law, 252(2)(d)
- Grant**, *see also* Government: grant
 - apprentice, *see* Apprenticeship Incentive Grant or Apprenticeship Completion Grant
 - Canada Oil Substitution Program, *see* Energy: conversion grant
 - Canadian Home Insulation Program, *see* Home insulation grant
 - exploration and development, 20(1)(kk)
 - “non-government assistance” defined, 127(9)
 - research
 - income from, 56(1)(o)
 - leaving Canada to pursue research under, 115(2)(b.1)
- Grantee organization**
 - defined, for transfer by registered charity, 149.1(1)
- Grass roots exploration**, *see* Pre-production mining expenditure
- Gratuities**, *see* Tips
- Grazing ungulates**, 80.3(1)“breeding animals”
- Great-aunt/great-uncle**
 - defined, 252(2)(f)
- Great Britain**, *see* United Kingdom
- Green card holder**
 - whether resident in U.S. for treaty purposes, Canada-U.S. Tax Treaty:Art. IV:1
- Green case overruled**, 96(2.01), (2.1)(f), 96(2.11)
- Green incentives**
 - CRCE, *see* Canadian renewable and conservation expense
 - Climate Action Incentive (greenhouse gas tax rebate), 122.8
 - electric vehicles, *see* Zero-emission vehicle
 - environmental trust, *see* Qualifying environmental trust
 - hydrogen vehicles, *see* Zero-emission vehicle
 - manufacturing and processing equipment, Reg. Sch. II:Cl. 43
 - public transit passes, credit for, 118.02 [pre-2018]
 - renewable power generating equipment, Reg. Sch. II:Cl. 43.1, Sch. II:Cl. 43.2
 - research and development, 37(1), 127(9)“SR&ED qualified expenditure pool”
- Greenhouse**
 - capital cost allowance for, Reg. Sch. II:Cl. 6(d), Sch. II:Cl. 8(m)
- Greenhouse Gas Pollution Pricing Act**
 - offsetting credit (Climate Action Incentive), 122.8(4)
 - offsetting refund to farmers, 127.42
- Gross Canadian life investment income**
 - defined, Reg. 2400(1)
- Gross compensation**
 - defined, 163.2(1), (12)(c)
- Gross cost**
 - defined, Reg. 5202, 5204
- Gross entitlements**
 - defined
 - for tax-debt avoidance penalty, 160.01(1)
 - for third-party penalty, 163.2(1)
- Gross investment revenue**
 - insurer’s, defined, 138(12)“gross investment revenue”
- Gross negligence**
 - effect on adjustment to related person’s tax, Canada–U.S. Tax Treaty Canada-U.S. Tax Treaty:Art. IX:5
 - failure to report exempt capital gain, exemption lost, 110.6(6)
 - penalty for failure to remit tax withheld, 227(9)(b), 227(9.1)
 - penalty for failure to withhold tax, 227(8)(b)
 - penalty for false statements of omissions, 163(2)
 - re flow-through share or joint exploration corporation, 163(2.2), (2.3)
- Gross REIT revenue**
 - defined, for SIFT rules, 122.1(1)
- Gross resource profits**
 - defined, Reg. 1204(1)
- Gross revenue**
 - defined, 248(1)
 - for international shipping rules, 250(6.01)
 - for interprovincial allocation of corporate income, Reg. 402(4)–(6)
 - limitation re non-profit R&D corporation, 149(9)
 - special rules re transfer pricing, 247(5), (9)
 - from a mine, defined, Reg. 1104(5.1), (5.2)
- Gross revenue insurance program**
 - payments to farmers under, income, 12(1)(p)
 - premiums in respect of, deductible, 20(1)(ff)
- Gross tax attributes (debt forgiveness rules)**
 - defined, 80(14.1)
 - inclusion in residual balance, 80(14)(a)
- Gross-up**
 - dividends, 82(1)(b)
- Ground source heat pump system**
 - capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(i), Sch. II:Cl. 43.2(b)
- Group**
 - defined
 - for associated corporations, 256(1.2)(a)
 - for surplus stripping rules, 84.1(2.2), 212.1(3)(d)(i)
 - of taxpayers with same issue, Tax Court appeal binding on all, 174
 - related, defined, 251(4)“related group”
 - unrelated, defined, 251(4)“unrelated group”
- Group adjusted net book income**
 - defined, for alternative interest-deduction restrictions, 18.21(1), (4)
- Group annuity contract**
 - defined, for Common Reporting Standard, 270(1)
- Group cash value insurance contract**
 - defined, for Common Reporting Standard, 270(1)
- Group disability benefits**
 - top-up payments by employer on insolvency of insurer, 6(17), (18)
 - reimbursement to employer, 8(1)(n.1)
- Group home care**
 - medical expense credit, 118.2(2)(b.2)
- Group insurance plan**
 - employer’s contributions to
 - top-up payments on insolvency of insurer, *see* Group disability benefits
 - whether included in employee’s income, 6(1)(a)(i), 6(1)(f)
- Group net interest expense**
 - defined, for alternative interest-deduction restrictions, 18.21(1)
- Group plan amount [formerly “group RRSP amount”]**
 - defined, 204.2(1.3)
- Group ratio**
 - defined, for alternative interest-deduction restrictions, 18.21(1)
- Group sickness or accident insurance**, *see* Sickness and accident insurance
- Group term insurance policy**
 - definition, re insurer, 138(15)
 - demutualization of insurance corporation, effect on insured, 139.1(15)
- Group term life insurance policy**
 - defined, 248(1)
 - employee contributions to employee life and health trust deemed to be premiums if identified as such, 144.1(10)

- Group term life insurance policy (*cont'd*)
- limitation on deduction of premiums, 18(9.01)
 - taxable benefit from premiums, 6(4), Reg. 2700–2704
- Grubstaker**, 35
- receipt of shares by
 - • deduction from amount, 110(1)(d.2)
- Guarantee**
- acquired from insurer or moneylender in amalgamation, 87(2)(h)(iii)
 - for controlled foreign affiliate, excluded from transfer pricing rules, 247(7.1)
 - loan to spouse or minor, of, 74.5(7)
 - of shares, *see* Guaranteed shares
 - payment under
 - • debt forgiveness rules, 80(2)(l)
 - • when treated as debt, 39(12)
 - reserve for, 12(1)(d.1), 20(1)(l.1)
 - • no deduction, 20(7)
- Guarantee agreement**
- defined, 112(2.2)(a)
 - no deduction for dividend, 112(2.2)–(2.22)
- Guarantee fee**
- deductible, 20(1)(e), (e.1)
 - no withholding tax, Canada-U.S. Tax Treaty:Art. XXII:4
 - non-resident, 214(15)
- Guarantee fund**
- deduction for payment by insurance corporation to, Reg. 1400(3)G
- Guaranteed Income Supplement, included in income**, 56(1)(a)(i)(A)
- Guaranteed shares**, *see also* Taxable preferred share; Term preferred share
- deemed dividend on reduction of paid-up capital, 84(4.3)
 - restriction on dividend deductibility, 112(2.2)–(2.22), 258(3)
- Guardian, return by**, 150(1)(d), (e)
- Guide dog expenses**, 118.2(2)(l)
- Guilt**, *see* Offences
- Gulf Canada case overruled re resource allowance**, Reg. 1204(1)
- Gulf of St. Lawrence oil exploration**
- communication of taxpayer information for, 241(4)(d)(vi)
 - joint management area, defined, 248(1)
- Gypsum**
- extraction of, 248(1)“mineral resource”(d)(ii)

H

- HBP**, *see* Home Buyers' Plan
- HBP balance**
- defined, for Home Buyers' Plan, 146.01(1)
- HBTC**, *see* Home Buyer's Tax Credit
- HMA**, *see* Hybrid mismatch arrangement
- HRDC**, *see* Human Resources Development Canada
- HRTC**, *see* Home renovation tax credit (2009–10)
- HWT**, *see* Health and welfare trust
- Habitation, right of (Quebec)**
- deemed to be trust, 248(3)
- Hairstylist**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Haiti**
- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(b) [repealed]
- Half-year rule, depreciable property**, Reg. 1100(2)–(2.4)
- Halifax disaster pension, exempt**, 81(1)(f)
- Halite**
- extraction of, 248(1)“mineral resource”(d)(ii)
- Handicapped persons**, *see* Mental or physical impairment
- Hangar, capital cost allowance**, Reg. Sch. II:Cl. 6(h)
- Hardest-hit business recovery program (COVID-19)**
- wage and rent subsidies, 125.7(1)“base percentage”(l)(ii), (m)(ii)
- Hardship**, *see* Undue hardship
- Hardwood flooring**
- disallowed as medical expense, 118.2(2)(l.2)(i), (ii), 118.2(2)(l.21)(i), (ii)
- Harness**
- capital cost allowance, Reg. Sch. II:Cl. 10(c)
- Headings in legislation**
- relevance of, *Interpretation Act* s. 14
- Head lease, defined**, 209(1)
- “term” defined, 209(1)
- Health and welfare trust**
- transfer of property to employee life and health trust, 144.1(16)–(17)
 - treated as employee life and health trust, 144.1(14)–(15)
- Health Canada**
- Special Access Programme, *see* Special Access Programme
- Health care plan**, *see* Private health services plan
- Health counselling**, *see* Counselling services
- Health promotion surtax**, 182, 183
- Health services plan**
- employer's contribution to
 - • not includable in employee's income, 6(1)(a)(i)
 - private, premiums to, 118.2(2)(q)
- Hearing aid, medical expense**, 118.2(2)(i)
- Hearing impairment**, *see also* Deaf person
- devices to assist person with
 - • business expense, 20(1)(rr)
 - • medical expense credit, Reg. 5700(q.1)
 - real-time captioning services for, *see* Captioning services
 - sign language interpretation services for, *see* Sign language
- Hearing officer**
- powers of, 231.4(3), (4)
- Hearse**
- excluded from definition of automobile, 248(1)“automobile”(c)
- Heart pacemaker/monitor**
- medical expense, Reg. 5700(d)
- Heat production/distribution equipment**
- capital cost allowance, Reg. Sch. II:Cl. 1(p), Sch. II:Cl. 2(f)
- Heat pump system**, *see* Ground source heat pump system
- Heat recovery equipment**
- capital cost allowance, Reg. Sch. II:Cl. 43.1
- Heating expenses**
- relief from, payments non-taxable, 81(1)(g.4), (g.5)
- Heavy duty equipment technician**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Heavy water**
- capital cost allowance for, Reg. Sch. II:Cl. 26
- Hedge**
- gain on, stop-loss rule on foreign affiliate share disposition, 93(2)–(2.31)
 - straddle transactions, rules preventing income deferral, 18(17)–(23)
- Heir**, *see also* Legal representative
- acquisition of property on death, cost base, 70(5)(b)
 - • resource property or land inventory, 70(5.2)
 - deemed to be legal representative, 248(1)“legal representative”
 - obligations of, 159
 - return required by, 150(3)

Henson trust

- rollover of RRSP to, 60.011

Hepatitis C trust

- income of, non-taxable, 81(1)(g.3)

Her Majesty, *see* Crown; Government

Herbert Family Trust case overruled, 214(3)(f)(i)(C)

Herd, *see* Basic herd

High school, *see* Secondary school

High value account

- defined, for Common Reporting Standard, 270(1)

Highest individual percentage

- defined, 248(1)

Hiring subsidy, 125.7(2.2)

History preservation rules, *see* Debt forgiveness: history preservation rules

Ho case overruled, 152(4)(b)(iii)(B)

Hockey players or referees, *see* Athlete

Hoefele case overruled, 6(23)

Hogs, *see* Swine

Hold

- meaning of, 139.1(1)“mutual holding corporation” (Notes)

Holder

- of registered disability savings plan (RDSP)
 - change in, notification required, 146.4(13)(a)
 - defined, 146.4(1)
 - liable for non-compliance by RDSP, 160.21
- of tax-free savings account (TFSA)
 - defined, 146.2(1)

Holding corporation (insurance demutualization)

- deemed not to be taxable Canadian property, 141(4)
- deemed to be public corporation, 141(3)
- defined, 139.1(1)
- dividend received by, no tax, 112(1)

Holiday

- deadline expiring on, *Interpretation Act* s. 26
- defined, *Interpretation Act* s. 35(1)
- includes Sunday, *Interpretation Act* s. 35(1)“holiday”

Holocaust survivor’s compensation, exempt, 81(1)(g)

Home, *see also* Principal residence; Underused housing tax

- Buyer’s Plan, *see* Home Buyers’ Plan
- construction costs, medical expense credit, 118.2(2)(1.21)
- defined, for Home Buyers’ Plan withholding exemption, Reg. 104(4)
- driveway alterations, medical expense credit, 118.2(2)(1.6)
- insulation grant, *see* Home insulation grant
- loan to purchase, *see* Home purchase loan
- loss in value of, reimbursement, *see* Housing loss
- maintenance of after moving away, deduction, 62(3)(g)
- modifications to, for physically impaired person
 - accessibility credit, *see* Home accessibility tax credit
 - medical expense credit, 118.2(2)(1.2)
- mortgage, *see* Mortgage
- office expenses, *see* Work space in home
- RRSP withdrawal to fund, *see* Home Buyers’ Plan
- relocation loan, *see* Home relocation loan
- renovation of, *see* Home renovations (wheelchair access etc.)
- sale of, *see* Principal residence
- search warrant of, 231.3
- warrant for entry into, for audit purposes, 231.1(1)(c), 231.1(3)

Home accessibility tax credit

- bankruptcy, effect of, 118.041(6), (7)
- calculation of, 118.041(3)
- apportionment among multiple claimants, 118.041(5)
- death, effect of, 118.041(7)(a)
- may double up with medical expense credit, 118.041(4)

Home Buyers’ Plan, 146.01

- death of taxpayer, 146.01(6), (7)
- definitions, 146.01(1)
- first-time owner requirement, 146.01(1)“regular eligible amount”(e), (f)
- repayment of funds borrowed from RRSP, 146.01(3)
- withdrawal of funds from RRSP, Reg. 104(3)
 - within 90 days of contribution, deduction disallowed, 146(5)(a)(iv.1), 146(5.1)(a)(iv)
- withholding tax exemption, Reg. 104(3)–(4)

Home Buyer’s Tax Credit, 118.05

Home construction costs

- medical expense, 118.2(2)(1.21)

Home insulation grant

- included in income, 12(1)(u), 56(1)(s)
- information return re, Reg. 224
- non-resident taxable on, 212(1)(s)
- prescribed program, Reg. 5500

Home mortgage, *see* Mortgage

Home office expenses, *see* Work space in home

Home purchase loan

- balance outstanding after 5 years deemed new loan, 80.4(6)
- defined, 80.4(7)
- employee or spouse, to, 15(2.4)(b)
- interest on, 80.4(4), (5)

Home relocation loan

- balance outstanding after 5 years deemed new loan, 80.4(6)
- deduction for, before 2018, 110(1)(j)
- defined, 248(1)
- interest on, 80.4(4), (5)

Home renovation tax credit (2009–10), 118.04, *see also* Home accessibility tax credit

Home renovations (wheelchair access etc.)

- driveway alterations, medical expense credit, 118.2(2)(1.6)
- medical expense, 118.2(2)(1.2), Reg. 5700

Homosexual relationships, *see* Common-law partner

Hong Kong, *see also* Foreign government

- film or video under treaty co-production, Reg. 1106(3)(b)
- stock exchange recognized, 262
- universities, gifts to, Reg. Sch. VIII, s. 19

Horse

- basic herd maintained since 1971, deduction, 29
- breeding, 80.3(1)“breeding animals”
- inventory, valuation of, 28(1.2)
- maintaining for racing, constitutes farming, 248(1)“farming”

Horseback riding

- eligible for children’s fitness credit, Reg. 9400(5)

Hospital bed

- medical expense, Reg. 5700(h)

Hot tub

- disallowed as medical expense, 118.2(2)(1.2)(i), (ii), 118.2(2)(1.21)(i), (ii)

Hot-air balloon rides relief (COVID), Reg. 8901.1(2)(b)(vi), *see also* Qualifying tourism or hospitality entity

Hotels and motels relief (COVID), Reg. 8901.1(2)(b)(i), *see also* Qualifying tourism or hospitality entity

House

- insulation, *see* Home insulation grant
- sale of, *see* Principal residence

House of Commons

- election of members, contributions for, 127(3)–(4.2)

Housing company

- limited-dividend
 - exemption, 149(1)(n)

Housing corporation

- donation to, 149.1(1)“qualified donee”(a)(i)

- Housing corporation (*cont'd*)
- by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
 - exempt from tax, 149(1)(i)
- Housing loan**, *see* Home purchase loan
- Housing loss**
- defined, 6(21)
 - eligible
 - defined, 6(22)
 - taxable benefit from, 6(1)(a), 6(20)
 - taxable benefit from, 6(1)(a), 6(19), (20)
- Housing subsidy**
- taxable benefit, 6(23)
- Housing tax**, *see* Underused housing tax
- Housing unit**, *see* Principal residence
- Human Resources Development Canada**
- advice re mental or physical impairment, 118.3(4)
 - certification of educational institution, 118.5(1)(a)(ii), 118.6(1)“designated educational institution”(a)(ii)
 - disclosure of information to, 241(4)(d)(vii.1), (x)
 - eligible individuals for Canada Child Benefit, 122.62, 165(3.1), (3.2), Reg. 6301
 - Social Insurance Number application, 237(1); Reg. 3800
- Hungary**, *see also* Foreign government
- universities, gifts to, Reg. Sch. VIII, s. 23
- Hunting camps relief (COVID)**, Reg. 8901.1(2)(b)(xii), *see also* Qualifying tourism or hospitality entity
- Husband and wife**, *see* Spouse
- Hutterite colonies, taxation**, 143, *see also* Communal organization
- Hybrid car**, *see* Zero-emission vehicle
- Hybrid deficit (of foreign affiliate)**
- defined, Reg. 5907(1)
- Hybrid entity**, *see also* Limited liability company; Nova Scotia: unlimited liability company
- treaty benefit denial, Canada-U.S. Tax Treaty:Art. IV:7
- Hybrid financial instrument arrangement**
- defined, 18.4(10)
 - effect of, 18.4(11)
- Hybrid financial instrument mismatch**
- defined, 18.4(11)
- Hybrid mismatch amount**
- defined, 18.4(1)
- Hybrid mismatch arrangement**
- anti-avoidance rules, 12.7, 18.4, 20(1)(yy), 113(5)
 - deduction denied, 18.4(4)
 - defined, 18.4(1)
 - dividend deduction denied, 113(5)
 - income inclusion, 12.7(3)
 - tax consequences determined, 18.4(20)
- Hybrid surplus (of foreign affiliate)**
- deduction for, 113(1)(a.1)
 - defined, 113(1)(a.1)(i), Reg. 5901(1)(a.1), 5907(1), (1.01)
 - election to come after taxable surplus, Reg. 5901(1.1)
 - portion of dividend deemed paid out of, Reg. 5900(1)(a.1)
- Hybrid transfer arrangement**
- defined, 18.4(12)
 - effect of, 18.4(13)
- Hybrid transfer mismatch**
- defined, 18.4(13)
- Hybrid underlying tax**
- defined, Reg. 5907(1)
- Hybrid underlying tax applicable**
- defined, Reg. 5907(1)

- Hydrocarbons**
- determination of viscosity and density, Reg. 1107
- Hydrogen car**, *see* Zero-emission vehicle
- Hypothec**, *see* Mortgage

I

- IAAC**, *see* Income-averaging annuity contract
- IATA**, *see* International Air Transport Association
- IBC**, *see* International banking centre until 2013
- IEP**, *see* Immediate expensing property
- IFE**, *see* Interest and financing expenses
- IFR**, *see* Interest and financing revenues
- IFRS**, *see* International Financial Reporting Standards
- IPP**, *see* Individual pension plan
- IPP minimum amount**
- defined, for Individual Pension Plan, Reg. 8500(1)
- IRA**, *see* Individual Retirement Account
- IRS**, *see* Internal Revenue Service (U.S.)
- ISIP**, *see* Indexed security investment plan
- ITAR (Income Tax Application Rules)**, *see after text of ITA*
- ITC**, *see* Investment tax credit
- Ice storm**
- extended deadlines
 - LSVCC investments, 127.4(5.1)
 - RRSP contributions, 146(22)
 - non-taxable employee reimbursements, *Ice Storm Employment Benefits Remission Order*
- Identical properties**
- deemed, for superficial loss and pregnant loss rules
 - capital property, 40(3.5)
 - inventory, 18(16)
 - right to acquire property, 54“superficial loss”(i)
 - share of SIFT wind-up corporation, 54“superficial loss”(j)
 - defined, 248(12)
 - for matchable expenditure rules, 18.1(12)
 - gain or loss from, 47
 - life insurance corporation, of, 138(11.1)
 - non-qualifying real property, 110.6(18)
 - property owned since before 1972, ITAR 26(8)–(8.5)
- Identification number**, *see* Social insurance number; Tax shelter: identification number
- Identified individual**
- defined, for annuity contracts, Reg. 301(1)(c)
- Ileostomy pads, as medical expense**, 118.2(2)(i)
- Illegal payments**
- when not deductible, 67.5
- Immediate expensing limit (for CCA)**
- defined, Reg. 1104(3.2)
- Immediate expensing property (for CCA)**
- deduction for, 20(1)(a), Reg. 1100(0.1)
 - defined, Reg. 1104(3.1)
- Immigrant trust**, *see* Immigration trust
- Immigration**, *see* Becoming resident in Canada
- Immigration Act**
- refugee under, *see* Refugee
- Immigration trust**
- five-year non-taxability until 2014, 94(1)“connected contributor”(a), 94(1)“resident contributor”(a)
- Immovable property**, *see also* Real property
- defined
 - *Income Tax Conventions Interpretation Act*, s. 5
 - *Quebec Civil Code*, art. 900–907
- Immune system deficiency**
- air or water purifier for, medical expense credit, Reg. 5700(c.1), (c.2)

Impaired loans

- reserve for, 20(1)(l)(ii)
- • no deduction when property seized by creditor, 79.1(8)
- • no interest income inclusion, 12(4.1)

Impairment. *see* Mental or physical impairment

Imposition of tax. *see* Liability for tax; Rates of tax

Imprisonment. *see* Offences

Imputation. *see* Attribution rules

In camera proceedings

- discipline etc., of authorized individual, to protect taxpayer information, 241(4.1)
- in Federal Court, 179
- review of jeopardy assessment, 225.2(10)
- review of solicitor-client privilege claim, 232(5)

“In trust for” accounts, 104(1) (Notes)

Inadequate consideration, 69

- exceptions to fair market value deeming provision, ITAR 32
- property acquired by gift or inheritance, 69(1)(c)
- property distributed to shareholder, 69(4), (5)
- purchase price in excess of fair market value, 69(1)(a)
- sale price below fair market value, 69(1)(b)

Incentive program

- for employees, taxable benefit, 6(1)(a)
- for RRSP, RRIF, TFSA, RESP or RDSP, 207.01(1)“advantage”(a)(v)

Includes

- meaning of (in a definition), 118.1(5) (Notes)

Income

- accumulating in a trust, 104(14), Reg. 2800
- active business, defined, 125(7)“income of the corporation for the year from an active business”
- alimony, 56(1)(b)
- allocation, *see* Income allocation
- annuity, 56(1)(d), (d.2)
- • capital element, deductible, 60(a)
- assistance, *see* Older Worker Adjustment, Program for; Social assistance payment
- automobile standby charge, 6(1)(e)
- • car salesperson/lessor, 6(2.1)
- • reasonable amount, 6(2)
- automotive pact, transitional assistance, 56(1)(a)(v)
- averaging, *see* Averaging of income; Income-averaging annuity contract
- beneficiary of trust, 104(13), (14), (15)
- blocked currency, in, 161(6)
- bond, *see also* Bond
- bursary, 56(1)(n)
- business or property, from, *see* Business or property income
- Canada Pension Plan benefits, 56(1)(a)(i)
- capital and, combined, 16(1), (4), (5)
- • paid to non-resident, 214(2)
- cash method of reporting (farming or fishing), 28(1)–(3)
- chief source of, 31
- cod fisherman, *see* Fishing: compensation programs
- computation of, *see* Computation of income
- death benefit, 56(1)(a)(iii)
- debenture, *see* Bond
- deferred profit sharing plan, receipts from, 56(1)(i)
- destruction of livestock, from, *see also* Livestock
- determination of, by Minister, 152(1.11), (1.12)
- dividends, 82(1)
- • non-resident corporation, from, 90
- “earned” for RRSP purposes, defined, 146(1)“earned income”
- “earned in the year in a province” defined, 120(4)
- earned in the year in a province by an individual, defined, Reg. Part XXVI
- earned or realized by any corporation after 1971, 55(2), (5)(b), (c)

- employee benefits plan
- • benefits, 6(1)(g)
- employment benefits, 6(1)
- employment insurance benefits, 6(1)(f), 56(1)(a)(iv)
- exclusions from, *see* Exemptions
- exempt, *see* Exemptions
- exploration and development expenses, recovery of, 59(3.2)
- “for the year” defined, 56(9)
- foreign resource property disposed of, 59(1)
- from active business, defined, 95(1), 125(7)
- from property, for dividend refund, 129(4)“income” or “loss”
- gaining or producing, purpose, 18(1)(a), Reg. 1102(1)(c)
- grants under certain government programs, 56(1)(s)
- indirect payments, 56(2)
- “investment income” defined, 110.6(1)
- *Labour Adjustment Benefits Act*, benefits under, 56(1)(a)(vi), Reg. 5502(a)
- legal costs recovered, 56(1)(l), (l.1)
- life insurance policy
- • proceeds of disposition of interest in, 56(1)(j)
- logging operations, from, defined, 127(2)“income for the year from logging operations in the province”
- maintenance payments, 56(1)(b), (c), (c.2)
- non-resident, of, 250.1(b)
- none, equivalent to zero income, 3(f)
- office or employment, from, 5(1), 6(1)
- old age security, 56(1)(a)(i)
- other sources of, 56–59.1
- pension, 56(1)(a)(i), 57
- place, from sources in, 4
- policyholder’s, 148(1), (1.1)
- prize for achievement, 56(1)(n)
- professional business, from, WIP deferral until 2017, 34
- Program for Older Worker Adjustment, income assistance, 56(1)(a)(vi), Reg. 5502(b)
- property transferred to minor, from
- • imputed to transferor, 75(2)
- property transferred to spouse, from, 212(12)
- property transferred to spouse or minor, 74.1
- Quebec Parental Insurance Plan benefits, 56(1)(a)(vii)
- refund of payments, deductible, 60(q)
- registered education savings plan, amounts received, 56(1)(q)
- registered retirement income fund, amounts received, 56(1)(t)
- registered retirement savings plan, amounts received from, 56(1)(h)
- repeated failures to report, penalty for, 163(1)
- research grant, 56(1)(o)
- resource property disposed of
- • prior reserve for uncollected amount, 59(2)
- retirement compensation arrangement
- • benefits under, 56(1)(x), (z)
- • disposition of interest in, 56(1)(y)
- retiring allowance, 56(1)(a)(ii)
- rights to, transferred, 56(4)
- • non-resident tax not applicable, 212(12)
- salary deferral arrangement, benefit under, 56(1)(w)
- Saskatchewan Pension Plan benefits, 56(1)(a)(i)(C)
- scholarship, 56(1)(n)
- • refund of, 56(1)(p)
- social assistance payments, 56(1)(u)
- source, from, 4
- splitting, *see* Income splitting
- superannuation benefits, 56(1)(a)(i), 57
- supplementary unemployment benefits, 56(1)(g)
- support payments, 56(1)(b), (c), (c.2)
- tax on, *see also* Tax
- • non-deductible, 18(1)(t)
- taxable, *see* Taxable income
- taxation year, for, 3

Income (*cont'd*)

- transitional assistance under auto pact, 56(1)(a)(v)
- trust, of
- • accumulating, *see* Accumulating income (of trust)
- • defined, 108(3)
- workers' compensation benefits, 56(1)(v)

Income attribution, *see* Attribution rules**Income averaging**, *see* Averaging of income**Income-averaging annuity contract**

- defined, 61(4), 248(1)
- payment under
- • non-resident, to, 212(1)(n)
- withholding tax, 153(1)(k)

Income bond

- defined, 248(1)
- interest paid on, not deductible, 18(1)(g)
- payment on deemed to be a dividend, 15(3), (4)

Income from a mine

- defined, Reg. 1104(5), (6)

Income from a non-qualifying business

- defined, for FAPI rules, 95(1)

Income from an active business, *see* Active business: income from**Income from property**, *see* Property: income from**Income interest in trust**, *see also* Trust (or estate)

- cost of, 106(1.1)
- defined, 108(1), 248(1)
- disposition of, 106(2)
- income inclusion, 106(1)
- property distributed in satisfaction of, 106(3)

Income maintenance insurance plan

- employer's contribution, whether a taxable benefit, 6(1)(a)(i)
- payment to employee under, taxable, 6(1)(f); ITAR 19

Income replacement benefits, taxable, 56(1)(r)**Income setoff adjustment**, *see* Transfer pricing income setoff adjustment**Income shortfall adjustment**

- defined (for corporate inclusion of partnership income), 34.2(1)

Income splitting, *see also* Attribution rules

- Family Tax Cut (2014-15), 119.1
- partnership income, 103
- pension income, *see* Pension: income: splitting with spouse
- spouses or common-law partners, approved (2014-15), 119.1
- tax on children at high rate, 120.4, *see also* Split income: tax on
- testamentary trusts, 104(2)

Income-splitting tax, 120.4

- death, consequence of, 120.4(1)“excluded amount”(a), (c); 120.4(1.1)(b), (c)(ii)
- spouse of person over 65, 120.4(1.1)(c)(i)

Income tax, *see* everywhere**Income Tax Application Rules**, *see after text of ITA***Income Tax Conventions Interpretation Act**, *see* Table of Contents**Income trust**, *see* SIFT trust**Incontinent person**, *see also* Mental or physical impairment

- products for use by, medical expense credit, 118.2(2)(i)

Incorporated employee, *see* Personal services business**Incorporated in Canada**

- defined, 248(1)“corporation”, “corporation incorporated in Canada”

Incorporation expenses

- deductible up to \$3,000, 20(1)(b)
- excess included in goodwill, Reg. Sch. II:Cl. 14.1

Incorporeal property, *see* Corporeal property**Indebtedness**, *see also* Debt; Loan

- defined, for deemed settlement of debt on amalgamation, 80(3)
- income of foreign affiliate from, 95(2)(a.3), 95(2.4), (2.5)“indebtedness”
- to non-resident trust, reporting requirement, 233.5(1)

Indemnity

- payment, provincial, excluded from income, 81(1)(q)
- reserve for, not deductible, 20(7)

Independent personal services, Canada-U.S. Tax Treaty: Art. V:9, VII**Indexed debt obligation**

- adjusted cost base of, 53(1)(g.1), 53(2)(l.1)
- amount deemed paid and received as interest, 16(6), Reg. 7001
- deduction from income, 20(1)(c), 16(6)
- defined, 248(1)
- excluded from annual interest accrual rules, 12(3), 12(11)“investment contract”(k)
- interest included in income, 12(1)(c), 16(6)
- prescribed amount, Reg. 7001

Indexed payment

- defined, re indexed debt obligation, Reg. 7001(7)

Indexed security investment plan

- transition for 1986, 47.1(28)

Indexing (for inflation)

- Child Tax Benefit before July 2016 and starting July 2020, 122.61(5)
- tax brackets, credits and dollar thresholds, 117.1(1), (1.1)
- tax-free savings account contribution limit, 207.01(1)“TFSA dollar limit”(d)

India, *see also* Foreign government

- universities, gifts to, Reg. Sch. VIII, s. 24

Indian

- credit for First Nations Tax payable, 120(2.2)
- exemption from tax, 81(1)(a)
- • exempt income eligible for contribution to pooled registered pension plan, 147.5(1)“exempt earned income”, 147.5(31)–(34)
- resident in Canada without permanent resident status
- • entitled to Canada Child Benefit, 122.6“eligible individual”(e)(v)
- • entitled to GST Credit, 122.5(2)(c)
- residential school settlement, *see* Indian Residential Schools Settlement trust
- tax evasion offences, 239(5)

Indian Residential Schools Settlement trust

- income of, non-taxable, 81(1)(g.3)(i)(C)

Indicator re foreign trust, *see* Non-arm's length indicator**Indirect assistance**

- taxable, 12(1)(x)(i)(C)

Indirect payments

- corporation, by
- • person paid through intermediary as proceeds of disposition of property, 183.1(5)
- deemed income, 56(2)
- distribution of corporate surplus, tax on, 183.1(5)

Indirectly

- meaning of, 17.1(1) (Notes)

Individual

- bankrupt, 128(2)
- computation of tax, 117–122.91
- computation of taxable income, order of application, 111.1
- credits, 118–118.95
- defined, 248(1)
- • excludes trust for purpose of home accessibility tax credit, 118.041(1)
- fiscal period of, 249.1(1)(b)(i)
- gifts, deduction from tax, 118.1(3)
- income earned in the year in a province, Reg. Part XXVI

Individual (cont'd)

- “income for the year” defined, 120(3)
- instalment base, Reg. 5300
- instalment payments, 155, 156
 - “instalment base” defined, 161(9)(a)
- insufficient instalment payments
 - interest limitation, 161(4)
- mentally or physically impaired, *see* Mental or physical impairment
 - over 65, deduction, 118(2)
 - unused, transfer to spouse, 118.8
- payment of tax, 155, 156
 - instalment base, 155(2), 156(3)
 - remainder, 158
 - rates of tax, 117(2)
 - abatement re provincial schooling allowance, 120(2)
 - addition to tax for income not earned in province, 120(1)
 - annual adjustment, 117.1
 - resident for part of year, 114
 - returns, 150(1)(d), (e)
 - surtax, 180.1 [repealed]
 - tax credits, 118
 - ordering of, 118.92
 - taxation year of, 249(1)(b)

Individual pension plan

- defined, Reg. 8300(1)
 - Minister may waive definition, Reg. 8300(1.1)
 - minimum amount, Reg. 8500(1)“IPP minimum amount”
 - minimum withdrawal, Reg. 8503(26)
 - permissible distribution, Reg. 8502(d)(x)
 - provisional PSPA in relation to, Reg. 8304(10)
 - special rules for designated plans, Reg. 8515

Individual Retirement Account, *see also* Foreign retirement arrangement

- exempt from Canadian withholding tax, Canada-U.S. Tax Treaty, Reg. Part XXI:2
- prescribed as foreign retirement arrangement, Reg. 6803

Inducement payments

- cancellation of lease, *see* Lease cancellation payment
- election re adjusted cost base, 53(2)(s), 53(2.1)
- election to offset against outlay or expense, 12(2.2)
- included in income, 12(1)(x)
- prescribed amount, Reg. 7300
- received by beneficiary of trust, or partner, 12(2.1)
- repayment of, 20(1)(hh)

Industrial electrician

- apprenticeship job creation credit, 127(9)“investment tax credit”

Industrial instrument mechanic

- apprenticeship job creation credit, 127(9)“investment tax credit”

Industrial mechanic (millwright)

- apprenticeship job creation credit, 127(9)“investment tax credit”

Industrial mineral mines

- capital cost allowance, Reg. 1100(1)(g), 1104(3), Reg. Sch. V

Industrial minerals

- producing, excluded from M&P credit, 125.1(3)“manufacturing or processing”(g)

Ineligible individual

- defined, 149.1(1)
 - managing or controlling charity
 - CRA can refuse to register charity, 149.1(25)
 - CRA can revoke registration of charity, 149.1(4.1)(e)
 - CRA can suspend registration, 188.2(2)
 - managing or controlling Canadian amateur athletic association
 - CRA can refuse to register RCAA, 149.1(25)
 - CRA can revoke registration of RCAA, 149.1(4.2)(c)

Ineligible property

- defined, for cost base bump on windup, 88(1)(c)(iii)–(vi)

Infant

- prone to sudden infant death syndrome
 - alarm, medical expense, Reg. 5700(r)

Infirm beneficiary

- defined, 94(1)“exempt foreign trust”(a)(i)(A)

Infirm dependant, *see also* Mental or physical impairment

- credit for, 118(1)B(d), (e)
- preferred beneficiary election, 108(1)“preferred beneficiary”(a)(ii)(A)
- training courses to care for, medical expense, 118.2(2)(1.8)

Inflation adjustment period

- defined, re indexed debt obligations, Reg. 7001(7)

Inflation indexing, *see* Indexing (for inflation)**Influence over a corporation**

- whether constitutes *de facto* control, 256(5.1), (5.11)

Informal procedure appeals, 170**Informant payments (for leads on international tax evasion)**

- disclosure of information by CRA to informer, 241(4)(r)
- payment to province only after collected by CRA, 152(10)(b)
- payments included in income, 56(1)(z.4)
 - deduction for repayment, 60(z.1)
 - non-resident withholding tax, 212(1)(x)
 - information return, Reg. 202(2)(m)
- withholding of tax at source, 153(1)(s), Reg. 103(9)

Information

- communication of, 241
- demand for, 231.2(1)(a)
- exchange of between tax authorities, Canada-U.S. Tax Treaty:Art. XXVII
- failure to provide, in return, penalty for, 162(5)
- foreign-based, 231.6
- laid, *see* Information or complaint
- outside Canada
 - foreign-based information or document, 231.6
 - tax shelter investment information, 143.2(13), (14)
- requirement to provide, 231.2(1)(a)
- return, *see* Information return

Information exchange agreement, *see* Tax information exchange agreement**Information or complaint**

- laid or made, 244(1)
- limitation on prosecutions, 244(4)
- territorial jurisdiction, 244(3)
- two or more offences in one, 244(2)

Information return, Reg. 200–237

- actor (non-resident), payment to, Reg. 202(1.1)
- apprenticeship grant, Reg. 200(2)(b.1)
- avoidance transactions, 237.3(2)
- bond interest, accrued, Reg. 211
- Canada Savings Bonds, cash bonus, Reg. 220
- Canadian Wheat Board Farmers’ Trust, 135.2(15)
- ceasing to be resident in Canada, value of assets, 128.1(9)
- certified films, Reg. 225
- charitable donation returned to donor, 110.1(16), 118.1(27), Reg. 3501.1
- charity, 149.1(14)
- construction contracts, Reg. 238
- contract payments
 - construction, Reg. 238
 - federal government, Reg. 237
- corporation
 - transactions with non-resident, non-arm’s length persons, 233.1
- country-by-country reporting, multinational groups, 233.8
- demand for, 233

- Information return (*cont'd*)
- distribution of taxpayer's portion of, Reg. 209
 - educational status, Reg. 203
 - electric, gas or steam corporations, Reg. 213
 - electronic filing required, Reg. 205.1
 - • penalty, 162(7.02)
 - electronic funds transfers, 244.2(1), 244.6
 - electronic mail of, Reg. 209(3)–(5)
 - eligible funeral arrangement, Reg. 201(1)(f)
 - email of, Reg. 209(3)–(5)
 - emigration, value of assets, 128.1(9)
 - employees stock option deferral, Reg. 200(5)
 - employees profit sharing plan, Reg. 212
 - energy conversion program, Reg. 224
 - farm support payments, Reg. 234–236
 - federal government contract, Reg. 237
 - foreign affiliate, 233.4
 - foreign plan PSPA, Reg. 8402(2)
 - foreign property, investment in, 233.3
 - foreign trust
 - • distributions from, 233.5
 - • indebtedness to, 233.5
 - • transfers to, 233.2(4)
 - government contract, Reg. 237
 - government-sponsored retirement arrangement, Reg. 8402.1
 - home insulation program, Reg. 224
 - interest expense denied, transferred to other group member, 18.2(5)
 - international electronic funds transfers, 244.2(1), 244.6
 - journalism organization, 149.1(14.1)
 - labour organization or labour trust, 149.01 [repealed]
 - legal representative, Reg. 206
 - life insurer, Reg. 217
 - making of regulations re, 221(1)(d)
 - NISA Fund No. 2, Reg. 201(1)(e)
 - non-profit organization, 149(12), 150(1)(a)
 - non-profit R&D corporation, 149(7)
 - non-qualified investment acquired by RRIF, Reg. 215(3)
 - non-qualified investment acquired by RRSP, Reg. 214(2)
 - non-qualified investment acquired by TFSA, Reg. 223(3)
 - non-resident claiming treaty protection, 150(1)(a)(ii)
 - non-resident transactions, 233.1–233.7
 - oil substitution program, Reg. 224
 - Part IV.1 tax, 187.5
 - Part VI.1 tax, 191.4(1)
 - partnership, Reg. 229, 229.1
 - past service pension adjustment, Reg. 8402
 - patronage payments, Reg. 218
 - penalty for failure to file electronically, 162(7.02)
 - penalty for failure to make, 162(7)(a)
 - pension adjustment, Reg. 8401
 - pension adjustment correction, Reg. 8402(4), 8402.01(4.1)
 - pension adjustment reversal, Reg. 8402.01
 - political contributions, 230.1(2), Reg. 2001
 - pooled registered pension plan, Reg. 213
 - public
 - • registered charity, 149.1(14)
 - public partnership, Reg. 229.1
 - public trust, Reg. 204.1
 - qualified investments, Reg. 221
 - RRIF loss carryback to deceased's return, Reg. 215(6)
 - RRSP loss carryback to deceased's return, Reg. 214(6)
 - registered Canadian amateur athletic association, 149.1(14)
 - registered education savings plan, 146.1(13.1), (15)
 - registered journalism organization, 149.1(14.1)
 - registered pension plan, Reg. 8409
 - registered retirement income funds, Reg. 215
 - registered retirement savings plan, Reg. 214, 214.1
 - • reportable transactions, 237.3(2)
 - • resource flow-through shares, Reg. 228
 - • SR&ED corporation, 149(7)
 - • security transactions, Reg. 230
 - • social assistance payment, Reg. 233
 - • Social Insurance Number, use of, 237(2)
 - • specified retirement arrangement PSPA, Reg. 8402(3)
 - • stock option deferral, Reg. 200(5)
 - • students, Reg. 203
 - • TFSA, Reg. 223
 - • tax shelter
 - • • participant, 237.1(6), 237.3(2)
 - • • promoter, 237.1(7), 237.3(2)
 - • transactions with non-residents, 233.1–233.7
 - • trust, Reg. 204, 204.1
 - • trust or corporation re Part XI tax, Reg. 207
 - • tuition fees, Reg. 203
 - • union, 149.01 [repealed]
 - • Universal Child Care Benefit, Reg. 200(6)
 - • video tapes, Reg. 225
 - • withholding of tax, Reg. 210
 - • workers' compensation payment, Reg. 232
- Inheritance**, *see also* Death of taxpayer
- debt forgiveness rules do not apply, 80(2)(a)
- In-home care of relative**
- before 2017, tax credit, 118(1)B(c.1)
- Initial deadline**
- defined, for insurance demutualization, 139.1(1)
- Initial non-qualified investment**
- defined, 204
- Initial transportation charges**
- defined (for pre-1966 cars), Reg. 1102(11)
- Injection substances**
- deduction for, 20(1)(mm)
- Injury, personal, property acquired as award for income from, exempt**, 81(1)(g.1), (g.2)
- In-laws, dependent**, 118(6)(b)
- Innovative regulatory capital**, *see* Regulated innovative capital
- Input tax credit**, *see* Goods and services tax (GST): input tax credit
- Inquiry**
- authorized by Minister, 231.4
 - compliance required, 231.5(2)
 - rights of person subjected to, 231.4(6)
 - rights of witness at, 231.4(5)
 - seizure of documents
 - • copies of, 232(13)
- Insider of a corporation**
- defined, Reg. 4803(1)
- Insolvency**, *see also* Bankruptcy; Financial difficulty (taxpayer in)
- insurance corporation, group disability insurance top-up payments, 6(17), (18)
- Inspection**, *see* Audit
- Inspector**
- defined, for surveys under *Canada Shipping Act*, Reg. 3600(2)
- Installation project**
- more than 12 months, consituted permanent establishment, Canada-U.S. Tax Treaty:Art. V(3)
- Instalment base**
- defined
 - • corporations, 157(4), Reg. 5301
 - • individuals, farming or fishing business, 155(2), Reg. 5300
 - • other individuals, 156(3), 161(9), Reg. 5300
- Instalment payments (Instalments)**
- capital and income combined, 16(1)

Index

Instalment payments (Instalments) (*cont'd*)

- ceasing to be resident in Canada, 128.1(5)
- dependent on use, 12(1)(g)
- sale of property, *see* Reserve
- tax, of
 - amounts deemed to be, 161(8)
 - annual, deceased taxpayer's, Reg. 1001
 - contra interest, 161(2.2)
 - corporations, 157
 - *de minimis* rule, 156.1(1), 157(2.1)
 - death of taxpayer, not required after, 156.1(2)
 - deficient
 - interest offset method, 161(2.2)
 - interest payable, 161(2)
 - limitation re corporations, 161(4.1)
 - penalty, 163.1
 - when certain tax credits deemed paid, 161(10)
 - estate, whether exempt, 156.1(2)(c)
 - farming or fishing income (individuals), 155, 156.1(2)
 - individuals, 156, 156.1
 - instalment base, defined, 161(9)(a), Reg. Part LIII
 - late, penalty for, 163.1
 - mutual fund trust, 156(2), 157(2)
 - offset interest, 161(2.2)
 - Part XII.3 tax, 211.3
 - SIFT trust, 157(2)
 - small corporation, 157(1.1)–(1.5)
 - transfers between accounts, 221.2
 - trust distributing property to non-resident, 107(5.1)

Instalment sale

- reserve for capital gain, 40(1)(a)(iii)

Instalment threshold

- defined, 156.1

Institution

- costs of care in, as medical expense, 118.2(2)(e)
- gifts to
 - by corporation, deduction for, 110.1(1)(c)
 - by individual, credit for, 118.1(1)“total cultural gifts”

Instrument, *see* Musical instrument

Insulation grant, *see* Home insulation grant

Insulator (heat and frost)

- apprenticeship job creation credit, 127(9)“investment tax credit”

Insulin, medical expense, 118.2(2)(k)

Insurance

- accidental death, not included in group life insurance benefit, Reg. 2700(2)
- corporation, *see* Insurance corporation
- defined to include reinsurance, 138(12)
- group plans
 - employer's contributions not includable in employee's income, 6(1)(a)(i)
 - life insurance, portion of premium taxable, 6(4)
 - paid-up, deduction for, 18(9.01)
- policy, *see* Insurance policy
- premiums, *see* Premium
- proceeds
 - in respect of depreciable property, taxable, 12(1)(f)
 - risks in Canada, by foreign affiliate, 95(2)(a.2)
 - sickness, accident, etc., benefits taxable, 6(1)(f); ITAR 19

Insurance agent or broker

- reserve for unearned commissions, 32

Insurance business

- defined, for financial institution transitional accounting rules, 12.5(1)

Insurance contract

- defined, for Common Reporting Standard, 270(1)

Insurance corporation, *see also* Financial institution; Life insurance corporation

- accounting rule changes, transitional rules, 12.5, 20.4, 138(16)–(25)
- amalgamation, 87(2.2)
- amortized cost, where meaning varied, 138(13)
- bad debts
 - deduction for, 20(1)(p)(ii)
 - inclusion in income, 12.4
- cash flow adjustment, Reg. 2412
- computation of income, 138(1), (6), 138(9), 140
- deduction for amounts paid or credited to policyholders, 140(1)
- deductions not allowed, 138(5)–(5.2), (8)
- deemed not to be private corporation, 141.1
- defined, 248(1)
- definitions, 138(12)
- demutualization, 139.1
- deposit, *see* Deposit insurance corporation
- disposition of Canadian securities, 39(5)(e)
- earthquake reserves, Reg. 1400(3)L
- electronic filing not required, Reg. 205.1(2)(a)
- exempt under Part IV, 186.1(b)
- farmers and fishermen, of
 - exemption for, 149(1)(t), 149(4.2)
 - limitation, 149(4.1)
- foreign affiliate, *see* Foreign affiliate: insurer
- gross investment revenue, defined, 138(12)
- guarantee fund, deduction for payment to, Reg. 1400(3)G
- guarantees etc.
 - acquired from, in amalgamation, 87(2)(h)(iii)
 - reserve for, 20(1)(1.1)
- inclusion in computing income for 1988 taxation year, 140(2)
- insolvent, group disability insurance top-up payments, 6(17), (18)
- liabilities of, determination for debt forgiveness reserve, 61.3(1)(b)C(ii)(B), (C)
- life, *see* Life insurance corporation
- loan/lending asset
 - acquired from, in amalgamation, 87(2)(h)(ii)
 - reduction in value of
 - limitation on deduction re, 18(1)(s)
- loans etc. acquired in ordinary course of business, 20(27)
- mark-to-market rules apply, 138(10)
- mutualization proposal, 139
- negative reserves, 12(1)(e.1), 20(22), Reg. 1400(2)
- non-resident, Reg. 219(4)–(8), 800–805.1, 2401
 - branch tax elections, Reg. 2403
 - change in use rules, 138(11.3)–(11.41), (11.6)
 - computation of income, 138(11.91)
 - domestication of branch operation, 138(11.5)
 - eligible property for transfer to corporation by shareholder, 85(1.1)(b)
 - excluded property, Reg. 810
 - qualified related corporation, 138(12)
 - registered, *see* Registered non-resident insurer
 - transfer of insurance business, 138(11.5)
 - anti-avoidance provisions, 138(11.7)
 - computation of income, 138(11.92)
 - contributed surplus, computation of, 138(11.9)
 - depreciable property, rules re, 138(11.8)
 - paid-up capital, computation of, 138(11.7)
- non-segregated property, 138(12)
- participating life insurance policy, defined, 138(12)
- policy loan, defined, 138(12), 148(9)
- policy reserves, Reg. 1400–1408
 - life insurance, 138(3)(a)(i)
 - post-1995 policies, Reg. 1404
 - pre-1996 policies, Reg. 1401(1)
 - negative, 20(1)(e.1), 20(22), Reg. 1400(2)

Insurance corporation (*cont'd*)

- non-life insurance, 20(7)(c), Reg. 1400
- regulations, Reg. 1400–1408
- property acquired on default in payment, 138(11.93)
- “property used by it in the year in, or held by it in the year in the course of”, 138(12)
- defined, Reg. 2400
- registered, *see* Registered non-resident insurer
- regulations, Reg. Part XXIV
- reserve for unpaid claims, *see also* policy reserves; unpaid claims reserve adjustment
 - life insurance, 138(3)(a)(ii)
 - post-1995 policies, Reg. 1405
 - limitation, 18(1)(e.1)
 - negative, 12(1)(e.1), 20(22), Reg. 1400(2)
- security used or held by
 - “eligible property” for transfer to corporation by shareholder, 85(1.1)(g)
- segregated funds of, 138.1, Reg. Part LXI
- subsidiary, wound up, 88(1)(g)
- surplus funds derived from operations, 138(12)
- taxable capital gains, 138(2)(b), 142
- taxable income earned in a province, Reg. 403
- transfer of insurance business
 - by non-resident insurer, 138(11.5)
 - by resident insurer, 138(11.94)
- transitional rules for accounting rule changes, 12.5, 20.4, 138(16)–(25)
- unpaid claims reserve adjustment, *see also* reserve for unpaid claims
 - claims incurred but not reported, Reg. 1400(3)D, E
 - deduction, 20(7), Reg. 1400(3)D, E
 - variation in tax basis and amortized cost, 138(13)

Insurance policy

- acquisition costs
 - not deductible to insurer, 18(9.02)
- disposition of, 148
 - no capital gain, 39(1)(a)(iii)
 - no capital loss, 39(1)(b)(ii)
- life, *see* Life insurance policy
- loan, *see* Policy loan (life insurance)
- reserves (insurer), *see* Insurance corporation: policy reserves; Insurance corporation: reserve for unpaid claims
- rider, *see* Rider

Insurance proceeds

- constitute proceeds of disposition, 13(21)“proceeds of disposition”(c), 54“proceeds of disposition”(c)
- rollover where property replaced, 13(4), (4.1), 44

Insurance swaps

- application of FAPI, 95(2)(a.21), (a.22)

Insured annuity

- leveraged, *see* LIA policy

Insurer, *see also* Insurance corporation

- defined, re life annuity contracts, 148(10)(a), Reg. 217(1)

Intangible property, *see also* Goodwill

- patents, Reg. Sch. II:Cl. 14, Sch. II:Cl. 44
- relating to road, bridge, townsite, etc., capital cost, 13(7.5)(c)

Integration

- capital dividend flow-through, 83(2), 89(1)“capital dividend account”(b)
- corporate and personal tax, 82(1)(b), 121
- intercorporate dividend flow-through, 82(1)(a), (a.1), 112(1)
- Part IV tax flow-through, 186(1)(b)

Intellectual property, *see* Copyright; Patent; Trade mark, representation expenses**Inter vivos trust**, *see also* Trust (or estate)

- defined, 108(1)

Inter-American Development Bank

- bonds of, qualified investment for RRSP etc., 204“qualified investment”(c.1) (formerly Reg. 4900(1)(1)(ii))

Intercorporate dividends generally tax-free, 112, 113**Interest (in property, etc.)**

- beneficial, in trust, meaning of, 248(25)
- capital, in trust, *see also* Trust (or estate)
- family farm partnership, in, 110.6(1)
- family fishing partnership, in, 110.6(1)
- income, in trust, *see also* Trust (or estate)
- life, in real property, *see* Life estate in real property
- partnership, *see* Partnership interest
- policy loan, re, defined, 138(12), Reg. 1408(1)
- qualifying, *see* Qualifying interest (in respect of foreign affiliate)
- real property, in, defined, 248(4)
- taxable Canadian property, in, 248(1)“taxable Canadian property”(l)
- trust, *see* Trust (or estate): interest in

Interest (money)

- accrued
 - corporations, partnerships, trusts, 12(3)
 - deduction on disposition of debt obligation, 20(21)
 - deemed, 12(9)
 - inclusion in income, 12(3), (4), (9)
 - individuals, 12(4)
 - on amalgamation, 87(2)(j.4)
 - prescribed debt obligation, on, 12(9), Reg. 7000
 - to date of death, 70(1)(a)
 - allowable refund of N.R.O., on, 133(7.01), (7.02)
 - annual reporting, *see* accrued (*above*)
 - benefit from loan, deemed to be, 80.5
 - bond
 - accrued, to date of transfer, 20(14)
 - information returns, Reg. 211
 - purchased at discount, 16(3)
 - borrowed money used to acquire land, on
 - defined, 18(3)“interest on debt relating to the acquisition of land”
 - not deductible, 18(2), (2.1)
 - partner, by, 18(2.1)
 - borrowed money used to acquire property no longer owned, 20.1(1)
 - borrowed money used to invest in deferred income plan, 18(11)
 - borrowed money used to invest in shares, 20(1)(c)
 - capital and, combined, 16(1)
 - on expropriation assets, 80.1(3)
 - capital gains refund, on
 - mutual fund corporation, 131(3.1), (3.2)
 - mutual fund trust, 132(2.1), (2.2)
 - capitalization into cost of property, 21
 - compounded daily, 248(11)
 - coupons to be identified as to taxable and non-taxable obligations, 240(2)
 - debt obligation, on, 20(14.1)
 - mark-to-market property of financial institution, 142.5(3)
 - debt relating to the acquisition of land, on
 - defined, 18(3)“interest on debt relating to the acquisition of land”
 - deductible, *see also* borrowed money used ... (*above*)
 - general rule, 20(1)(c)
 - limited to 30% of EBITDA, *see* Excessive interest and financing expenses limitation (EIFEL)
 - paid under *Income Tax Act*, not deductible, 18(1)(t)
 - thin capitalization restrictions, 18(4)–(8)
 - deduction by certain corporations, limitation on, 18(4)–(6)
 - deduction restrictions, *see* deductible: limited to 30% (*above*)
 - deemed

Index

- Interest (money) (*cont'd*)
 - amount paid by credit union re member's share, 137(4.1)
 - benefit from loan, 80.5
 - certain shares, on, 258(5)
 - non-resident tax, 214(6), (14)
 - preferred shares, on, 258(3)
 - deemed received by corporation on loan to non-resident, 17
 - defined, *Income Tax Conventions Interpretation Act* s. 6
 - dividend refund, on, 129(2.1), (2.2)
 - escalating interest GICs, Reg. 7000(2)(c.1)
 - expense
 - amount deductible, 20(1)(c), (d)
 - compound, 20(1)(d)
 - election to capitalize, 21(1)
 - employee's automobile or aircraft, 8(1)(j)(i)
 - limitation on deduction by certain corporations, 18(4)–(6)
 - minimum tax, 127.52(1)(b), (c), (c.2), (e.1)
 - policy loans, on, 20(2.1), 138(12)“interest”, Reg. 4001
 - expropriation assets, on
 - election re, 80.1(2)
 - forgiven, 80(2)(b)
 - fully exempt, *see* Fully exempt interest
 - income bond, on, deemed dividend, 15(3)
 - non-resident corporation, 15(4)
 - income from business or property, 12(1)(c)
 - whether specified investment business, 125(7)“specified investment business”
 - increasing rates, income accrual, Reg. 7000(2)(c.1)
 - instalments of tax, late or insufficient, 161(2)
 - additional 3% payable, 161(3)
 - limitation, 161(4), (4.1)
 - not deductible, 18(1)(t)
 - offset, 161(2.2)
 - scientific research tax credit, when deemed paid, 161(10)
 - share-purchase tax credit, when deemed paid, 161(10)
 - where not payable, 161(2.1)
 - interest repaid, on, 164(4)
 - loss carryback, effect of, 161(7)
 - loss of source of income, 20.1(1)
 - obligation issued at a discount, 16(3)
 - offset
 - arrears interest against refund interest, 161.1
 - early instalments against late instalments, 161(2.2)
 - paid on death duties, deduction, 60(d)
 - paid or payable, deduction for, *see* deductible (*above*)
 - paid to non-resident, withholding tax, 212(1)(b)
 - by wholly-owned subsidiary, 218
 - to U.S. resident, Canada-U.S. Tax Treaty:Art. XI
 - participating debt, *see* Participating debt interest
 - payable
 - carryback re minimum tax, no effect, 161(7)
 - penalty, on, 161(11)
 - penalty or bonus, treated as interest expense, 18(9.1)
 - prepaid, deduction for, 18(9), (9.2)–(9.8)
 - prescribed rate, Reg. 4301
 - property transferred from spouse, 74.1
 - rate of, Reg. 4301
 - rate reduction payments, treated as interest expense, 18(9.1)
 - refunds and repayments, on, 164(3)–(4)
 - repayment of, deduction for, 20(1)(II)
 - spouse, property transferred to, 74.1, *see also* Attribution rules
 - stapled security, on, 18.3(3)
 - student loan, paid, credit for, 118.62
 - tax withheld but not remitted, on, 227(9.3)
 - unclaimed at year-end
 - withholding tax, 153(4)
 - effect of remittance, 153(5)
 - unpaid tax, on, 161(1), 227(9.3)
 - adjustment of foreign tax, 161(6.1)
 - grace period to pay balance, 161.2
 - income in blocked currency, 161(6)
 - loss carryback, effect of, 164(5), (5.1)
 - none, re participation certificate, 161(5)
 - not deductible, 18(1)(t)
 - offset
 - arrears interest against refund interest, 161.1
 - early instalments against late instalments, 161(2.2)
 - Part III, 185(2)
 - Part III.1, 185.2(2)
 - Part IV, 187(2)
 - Part V, 189(7)
 - Part X, 202(5)
 - Part XII.3, 211.5
 - Part XII.4 tax, 211.6(5)
 - Part XII.5 tax, 211.82
 - retroactive to application date of provision, 221.1
 - up to \$25, may be cancelled, 161.3
 - waiver of, 220(3.1)
 - withholding tax, 212(1)(b)
 - Interest and financing expenses**
 - defined, for interest deduction restrictions, 18.2(1), (13), 248(1)
 - interest deduction limited to 30% of EBITDA, 18.2(2)
 - Interest and financing revenues**
 - defined, for interest deduction restrictions, 18.2(1), (12), (14), 248(1)
 - reduces limitation on interest expense, 18.2(2)A
 - Interest coupon holder**
 - defined, 212(21)(a)
 - Interest coupon stripping**
 - anti-avoidance rules, 212(1)(b)(i)(B), 212(21)–(23)
 - Interest-free loan**, *see* Loan: interest-free
 - Interest gross-up period**
 - defined, for non-resident trust rules, 94(15)(c)(ii)C
 - Interest in a family farm or fishing partnership**
 - defined, 70(10)
 - rollover, 70(9)–(9.31), 73(3)–(4.1)
 - Interference with remittances of tax withheld**, 227(5.2)–(5.4) (1995 draft, abandoned)
 - Intergenerational transfers**
 - attribution of income or loss, 74.1(2)
 - farm or fishing property
 - *inter vivos*, 73(3)–(4.1)
 - on death, 70(9)–(9.31)
 - Interim receiver**
 - withholding tax, liability for, 227(5), (5.1)(d)
 - Internal Revenue Service (U.S.)**, *see also* United States
 - collection of Canadian tax, Canada-U.S. Tax Treaty:Art. XXVI A
 - competent authority procedures, Canada-U.S. Tax Treaty:Art. XXVI
 - exchange of information with CRA, Canada-U.S. Tax Treaty:Art. XXVII
 - Internal waters**
 - defined, *Interpretation Act* 35(1)
 - International agencies, prescribed**, Reg. 806.1
 - International Air Transport Association**
 - employment income of non-Canadians, deduction for, 110(1)(f)(iv)
 - International Bank for Reconstruction and Development**
 - bonds of, qualified investment for RRSP etc., 204“qualified investment”(c.1) (formerly Reg. 4900(1)(l)(i))
 - International banking centre until 2013**, 33.1
 - International development assistance programs**
 - person working on deemed resident in Canada, 250(1)(d)
 - prescribed, Reg. 3400

International Finance Corporation

- bonds of, qualified investment for RRSP etc., 204“qualified investment”(c.1) (formerly Reg. 4900(1)(l)(i.1))

International Financial Reporting Standards

- effect of, 9(1) (Notes)
- insurers, application to, 138(17.1)
- liabilities and reserves to be computed gross of reinsurance, Reg. 2400(1)“Canadian reserve liabilities”
- transition year, 138(12)“transition year”(b)

International organization

- defined, for Common Reporting Standard, 270(1)
- employment income from
 - deduction, 110(1)(f)(iii)
 - tax credit, 126(3)
- interest paid to, withholding tax exemption, Reg. 806

International shipping

- aircraft used in
 - lease payments exempt from withholding tax, 212(1)(d)(xi)
- corporation, residence of, 250(6)
- defined, 248(1)
- income of non-resident from, exempt, 81(1)(c)
- non-resident’s income from, exempt, 81(1)(c)
- residence of shipping corporation, 250(6)–(6.04)
- service provider deemed to have international shipping as principal business, 250(6.02), (6.03)

International sport federation, eligibility requirements of, see Amateur athlete trust**International tax**

- advisory panel, *see* Advisory Panel on International Taxation
- conventions, *see* Tax treaty
- dividends received from foreign corporations, 90, 113
- foreign accrual property income, 91, 95
- foreign tax credit, 126, *see also* Foreign tax credit
- treaties, *see* Tax treaty
- United States, rules re, *see* United States
- withholding tax, 212, *see also* Withholding

International traffic, see also International shipping

- aircraft operated by non-resident in
 - capital gains on, 248(1)“taxable Canadian property”(b)(ii)
 - income of non-resident exempt, 81(1)(c)
 - residence of corporation, 250(6)
- capital tax on ships and aircraft, Canada-U.S. Tax Treaty:Art. XXIII:3
- defined, Canada-U.S. Tax Treaty:Art. III:1(h); Canada-U.K. Tax Treaty:Art. 3.1(i)
- employee employed in, Canada, Canada-U.S. Tax Treaty:Art. XV:3
- profits from, Canada-U.S. Tax Treaty:Art. VIII

Interpolation time

- re life insurance policy coverage, defined, Reg. 1401(3)

Interpretation, 248–260

- definitions, 248(1)
- *Income Tax Conventions Interpretation Act*, *see* Table of Contents
- *Interpretation Act*, *see* Table of Contents

Interpretation services

- sign language
 - disability supports deduction, 64(a)A(ii)(A)
 - medical expense credit, 118.2(2)(l.4)

Inventory

- adding property to, non-resident, 10(12), (14)
- adjustment
 - amalgamation, on, 87(2)(j.1)
 - deduction from income, 20(1)(ii)
 - inclusion in income, 12(1)(r)
- adventure in the nature of trade, 10(1.01)
- superficial loss rule, 18(14)–(16)
- allowance, repealed [was 20(1)(gg)]

- amalgamation, on, 87(2)(b)
- artistic endeavour, of, 10(6)–(8)
- ceasing to use in business, non-resident, 10(12), (14)
- cost of
 - non-deductible expenses included in, 10(1.1)
- defined, 248(1)
- specified debt obligation and mark-to-market property excluded, 142.6(3)
- “eligible property” for transfer to corporation by shareholder, 85(1.1)(f)
- examination of property in, 231.1
- exploration and development shares, 66.3(1)
- farming business, of, *see* Farming: inventory
- financial institutions, *see* Mark-to-market property
- manner of keeping, Reg. 1800
- mark-to-market rules, *see* Mark-to-market property
- non-resident, 10(12)–(14)
- removing property from, non-resident, 10(12), (14)
- reserve on sale of, 20(1)(n), 20(8)
 - where property repossessed by creditor, 79.1(4)
- sale of
 - after ceasing to carry on business, 23(1)
 - included in income, 9(1)
 - repossession by vendor in same taxation year, 79.1(5)
- share held as, stop-loss rules on disposition, 112(4)–(4.2)
- transfer to corporation, 85(1)(c.1), (e.3)
- valuation of, 10, Reg. 1801
 - adventure in the nature of trade, 10(1.01), (9)
 - change in control of corporation, 10(10)
 - consistency required, 10(2.1)
 - farming business, 28(1.2), (1.3), Reg. 1802
 - incorrect, 10(3)
 - shares, 112(4.1)
- writedown, 10(1)
 - adventure in the nature of trade, 10(1.01), (9)
 - change in control of corporation, 10(10)
 - derivatives excluded, 10(15)
 - of loan, denied, 18(1)(s)
 - superficial loss rule, 18(14)–(16)

Investment

- allowance, *see* Investment allowance
- business, *see* Investment business
- corporation, *see* Investment corporation
- counselling, *see* Investment counselling fees
- defined
 - for foreign affiliate dumping, 212.3(10)
 - for SIFT trust and partnership distributions, 122.1(1)
- income, *see* Investment income
- offshore, *see* Offshore investment fund
- prohibited, *see* Prohibited investment
- property, *see* Investment property
- qualified, *see* Qualified investment
- registered, tax re, 204.4–204.7
- tax credit, *see* Investment tax credit
- tax shelter, *see* Tax shelter: investment
- time, *see* Investment time

Investment advice, see Investment counselling fees**Investment allowance**

- defined
 - for large corporations tax, 181.2(4), 181.3(4)
 - for Part XIV branch tax, 219(1)(j), Reg. 808

Investment business, see also Specified investment business

- of foreign affiliate
 - defined, 95(1)
 - excluded from active business, 95(1)“active business”(a)
 - start-up rule, 95(2)(k)(i)

Investment club

- tax treatment, Information Circular 73-13 (no ITA provision)

Investment contract, *see also* Debt obligation

- anniversary day
- accrued interest, 12(4)
- defined, 12(11)
- defined, 12(11)

Investment contract corporation, prescribed, Reg. 6703

- exempt from Part IV tax, 186.1(b)

Investment corporation, 130

- deduction from tax, 130(1)
- defined, 130(3)(a), 248(1)
- election not to be restricted financial institution, 131(10)
- election re capital gains dividend, Reg. 2104
- information return where share claimed to be qualified investment, Reg. 221
- mortgage, *see* Mortgage investment corporation
- not subject to mark-to-market rules, 142.2(1)“financial institution”(c)(i)
- special tax rate, 130
- taxed capital gains, 130(3)(a)
- that is not mutual fund corporation, 130(2)

Investment counselling fees

- deductible, 20(1)(bb)
- for RRSP, RRIF or TFSA, non-deductible, 18(1)(u)

Investment dealer, *see also* Financial institution; Registered securities dealer

- defined, 142.2(1)
- subject to mark-to-market rules, 142.2(1)“financial institution”

Investment entity

- defined, for Common Reporting Standard, 270(1)

Investment expense, defined, 110.6(1)**Investment fund**

- defined, for loss restriction event rules for trusts, 251.2(1)

Investment-grade debt

- qualified investment for RRSP etc., 204“qualified investment”(c.1) (formerly Reg. 4900(1)(i)(i.3), (o)); Reg. 4900(1)(j.2)

Investment income, *see also* Property: income from

- aggregate, *see* Aggregate investment income
- associated corporation, from, 129(6)
- Canadian, defined, 129(4)
- defined, 110.6(1)
- foreign, defined, 129(4)
- information returns, Reg. 201
- life insurer’s, tax on, 211–211.5
- refundable tax on, 123.3

Investment interest

- in a business, ITAR 23(5)“investment interest”, “1971 receivables”

Investment loss

- business, *see* Business investment loss

Investment manager

- defined, 44.1(1)“eligible pooling arrangement”

Investment property

- defined
- for deposit insurance corporation, 137.1(5)
- foreign affiliate, 95(1)
- insurer, Reg. 2400(1)

Investment shortfall

- for labour-sponsored venture capital corporation, 204.82(2.1), (2.2)

Investment tax credit, 127(5)–(36)

- addition to, 127(10.1)
- amalgamation, on, 87(2)(j.6)
- annual limit, defined, 127(9)
- apprenticeship expenditures, 127(9)“investment tax credit”(a.4)
- assistance or government assistance, effect of, 127(18)–(21)
- continuation of predecessors, 87(2)(qq)

- associated corporations, 127(10.3)
- failure to file agreement, 127(10.4)
- Atlantic provinces, 127(9)“investment tax credit”(a), 127(9)“specified percentage”(a)(iii)(D), (a.1)
- available-for-use rule, 127(11.2), 248(19)
- carryforward, 127(9)“investment tax credit”(c)–(h)
- transitional rules for change to 20 years, 127(9.01), (9.02), (36)
- certified property
- ascertainment of, 127(10)(a), (b)
- prescribed areas, Reg. 4602
- child care space creation, 127(9)“investment tax credit”(a.5)
- recapture if not kept for 5 years, 127(27.1)–(27.12)
- conversion of property to commercial use, 127(9)
- cooperative corporation, 127(6)
- defined, 127(9), (11.1), (12)–(12.2)
- definitions, 127(9)
- depreciable property acquired before change of control, 13(24), (25)
- expenditure limit, determination of, 127(10.2), (10.6)
- filing deadline, 37(11), 127(9)“investment tax credit”(m)
- flow-through mining expenditures, 127(9)“investment tax credit”(a.2)
- included in income, 12(1)(t)
- year of death, 70(1)(b)
- limited partner, of, 127(8.1)
- non-arm’s length transactions, 127(11.6)–(11.8), (24)
- overpayment of tax as consequence of, 164(5), (5.1)
- parent’s, after subsidiary wound up, 88(1)(e.3)
- partnership, allocation to partners, 127(8)
- non-limited partners, 127(8.3)
- recapture of, 127(28)
- pre-production mining expenditures, 127(9)“investment tax credit”(a.3)
- qualified property, Reg. 4600
- defined, 127(9), (11)
- R&D, *see* scientific research (*below*)
- reassessment, 152(6)(d)
- recapture of, 127(27)–(36)
- deduction in later year, 37(1)(c.2)
- refundable, 127.1
- defined, 127.1(2)
- depreciable property acquired before change of control, 13(24), (25)
- renunciation of, by general partner, 127(8.4)
- repayment of assistance, 127(9)“investment tax credit”(e.1), 127(10.7)
- scientific research
- basic 20% credit, 127(9)“investment tax credit”(a.1)
- extra 15% credit, 127(10.1)
- small business, 127(9)“qualified small-business property” [repealed], 127(9)“specified percentage”(i)
- specified percentage, 127(9)
- super-R&D allowance by province, federal bonus, 127(9)“super-allowance benefit amount”, 127(10.1)(b)
- trusts, allocation to beneficiaries, 127(7)
- reduces cumulative Canadian exploration expense, 127(12.3)
- unpaid amounts, 127(26)
- where control of corporation acquired, 127(9.1), (9.2)
- windup of corporation, flow-through to parent, 88(1)(e.3)

Investment time

- defined
- for foreign affiliate dumping, 212.3(1)

Investment trust, *see* Mutual fund trust**Investor**

- defined, for intercorporate dividends, 112(2.6)

Involuntary dispositions

- resource property, 59.1

Ireland, *see also* Foreign government

- stock exchange recognized, 262
- universities, gifts to, Reg. Sch. VIII, s. 10

Iron

- processing ore, whether manufacturing or processing, 125.1(3)“manufacturing or processing”, Reg. 5203

Iron lung, as medical expense, 118.2(2)(i)**Ironworker**

- apprenticeship job creation credit, 127(9)“investment tax credit”

Irrigation pipe

- construction costs deductible by farmer, 20(1)(ee)

Israel, *see also* Foreign government

- bonds of, *see* Israel Bonds
- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(c)–(e) [repealed]
- debt of, *see* Israel Bonds
- stock exchange recognized, 262
- universities, gifts to, Reg. Sch. VIII, s. 8

Israel Bonds

- eligible for RRSPs and RRFIs, 204“qualified investment”(c.1) (formerly Reg. 4900(1)(o))

Issue estoppel, 169(2)**Issuer**

- RDSP, defined, 146.4(1)“disability savings plan”(a)(i)
- RRSP, defined, 146(1), Reg. 214(7)
- TFSA, defined, 146.2(1)

Italy, *see also* Foreign government

- stock exchange recognized, 262

J**JEC**, *see* Joint exploration corporation**JJ Herbert Family Trust case overruled**, 214(3)(f)(i)(C)**Jail**, *see* Offences**Jamaica**, *see also* Foreign government

- universities, gifts to, Reg. Sch. VIII, s. 15

Japan, *see also* Foreign government

- film or video under treaty co-production, Reg. 1106(3)(c)
- stock exchange recognized, 262

Jeopardy assessment or jeopardy order

- re collection restrictions, 225.2(2)
- refund not to be paid, 164(1.2)

Jesuit

- income of, not taxed, 110(2)

Jetty, capital cost allowance for, Reg. Sch. II:Cl. 1(e), Sch. II:Cl. 3**Jewellery**, *see* Listed personal property**Jig, capital cost allowance**, Reg. Sch. II:Cl. 12(d)**Job coaching services**

- disability supports deduction, 64(a)A(ii)(K)

Job retraining

- employment insurance benefit, not included in income, 56(1)(a)(iv)
- reimbursed tuition fees, no credit unless included in income, 118.5(1)(a)(iii)

Joint and several liability, *see* Liability for tax: joint and several**Joint contributor (to non-resident trust)**

- attribution of trust’s income to electing contributors, 94(16)(a)A(ii)
- defined, 94(1)
- liability for joint contribution to trust, 94(17)

Joint election, *see also* Election(s)

- defined, for pension income splitting, 60.03(1)

Joint exploration corporation

- agreed portion, defined, 66(15)
- defined, 66(15)

- share, adjusted cost base, 53(2)(f.1)
- shareholder corporation, defined, 66(15)

Joint liability, *see* Liability for tax: joint and several**Joint management area (re Gulf of St. Lawrence oil exploration)**

- deemed to be province for corporate tax reduction, 124(4)“province”
- defined, 248(1)

Joint partner trust, *see* Joint spousal or common-law partner trust**Joint spousal or common-law partner trust**, *see also* Post-1971 spousal or common-law partner trust; Trust (or estate): spouse, for

- deduction from income, 104(6)(b)B(i)
- defined, 104(4)(a)(iv)(B), (C), 248(1)
- distribution of property to person other than taxpayer or spouse, 107(4)(a)(iii)
- preferred beneficiary election by, 104(15)(a)
- principal residence exemption, 54“principal residence”(c.1)(iii.1)(A)
- transfer by, to another trust, 104(5.8)
- transfer to, rollover, 73(1.01)(c)(iii)

Journalism, *see also* Qualified Canadian journalism organization; Qualifying journalism organization; Registered journalism organization

- digital news subscription credit, 118.02
- donations to, 149.1(1)“qualified donee”(b.1)
- online news subscription credit, 118.02
- refundable labour tax credit, 125.6

Judge, *see also* Court

- application to, re seized documents, 232(4), (8)
- bribery of, non-deductible, 67.5
- defined
 - for jeopardy assessment and collection, 225.2(1)
 - for search and seizure, 231
- income from professional practice, 24.1 [repealed]
- issue of search warrant, 231.3(1)–(4)
- pension plan, Reg. 8309
- powers in jeopardy proceedings, 223(11), (12)
- review of requirement to provide foreign-based information, 231.6(5)
- RRSP contribution room, Reg. 8309(2)

Judicial notice

- regulations, etc., 244(12)

Jurisdiction

- territorial, 244(3)

Juror’s fees

- taxable, 3 (*per* IT-377R)

Jury duty, *see* Juror’s fees**K****Kaolin**

- extraction of, 248(1)“mineral resource”(d)(ii)
- included in definition of “mineral”, 248(1)

Key employee

- defined, for employee life and health trust (ELHT), 144.1(1)
- ELHT must not be operated primarily for, 144.1(3)(b)
- ELHT must not give more rights to, 144.1(2)(e), (f)

Kickbacks, *see* Illegal payments**Kiddie tax**, *see* Income-splitting tax**Kidney machine, medical expense**, 118.2(2)(i)**Kilns**

- capital cost allowance for, Reg. Sch. II:Cl. 8

Kilometres driven, allowance for, Reg. 7306**Kinder Morgan pipeline corp taxable**, Reg. 7100(k)**Kinship care, social assistance for**

- payments do not increase net income, 81(1)(h.1)

Index

- Kinship care, social assistance for (*cont'd*)
- payments do not prevent Canada Workers Benefit single-parent status, 122.7(1.2)
 - payments do not reduce Canada Child Benefit, 81(1)(h.1)
- Kitchen utensils**
- capital cost allowance for, Reg. Sch. II:Cl. 12(c)
- Kiwi loans**, *see* Weak currency debt
- Know your customer procedures**, *see* Anti-money laundering and know your customer procedures
- Koller case overruled**, 81(1)(g)
- Korea**, *see also* Foreign government
- film or video under treaty co-production, Reg. 1106(3)(d)
- Kruger Inc. case overruled**, 10.1(7)
- Krull case overruled**, 6(23)
- Kuwait**
- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(f) [repealed]
- L**
- LCGE (Lifetime capital gains exemption)**, *see* Capital gains deduction
- LCT**, *see* Large corporations tax (Part I.3)
- LIA policy**
- annual accrual taxation, Reg. 306(1)
 - defined, 248(1)
 - FMV of property disposed of on death, 70(5.31)
 - no deduction for premiums paid, 20(1)(e.2)
 - no increase in CDA for death benefit, 89(1)“capital dividend account”(d)(ii)
- LIF**, *see* Life income fund
- LIRA**, *see* Locked-in retirement account
- LLC**, *see* Limited liability company (U.S.)
- LLP**, *see* Lifelong Learning Plan; Limited liability partnership
- LLP balance**
- defined, 146.02(1)
- LNG**, *see* Liquefied natural gas
- LPP**, *see* Listed personal property
- LRE**, *see* Loss restriction event
- LRIP**, *see* Low rate income pool
- LSVCC**, *see* Labour-sponsored venture capital corporation (LSVCC)
- La Survivance case overruled**, 256(9)
- Laboratory services, as medical expense**, 118.2(2)(o)
- Labour Adjustment Benefits Act**
- benefits under
 - income, 56(1)(a)(vi), Reg. 5502(a)
 - withholding of tax at source, 153(1)(m), Reg. 5502(a)
 - repayment of overpayment under, deduction for, 60(n)(v)
- Labour credit**
- journalism, 125.6
- Labour expenditure (re Canadian film/video tax credit)**
- defined, 125.4(1)
 - qualified, *see* Qualified labour expenditure (re Canadian film/video tax credit)
- Labour mobility deduction**, 8(1)(t)
- Labour organization**
- exemption, 149(1)(k)
- Labour-sponsored funds tax credit**
- acquisition of share by RRSP, 127.4(1)“qualifying trust”, 127.4(3) [repealed]
 - computation of, 127.4(3), (4)
 - cooling-off period, three years, 127.4(3)
 - deduction of, 127.4(2)
 - defined, 127.4(1), (6), 204.8(1), 211.7(1)
 - eliminated by 2017, 127.4(5), (6)
 - provincial, does not reduce ACB of investment, 53(2)(k)(i)(C)
 - RRSP, 127.4(1)“qualifying trust”, 127.4(6)(a)
 - recovery of
 - disposition of share, 211.8
 - national LSVCC, Reg. 6706
 - provincial LSVCC, 211.7
- Labour-sponsored venture capital corporation (LSVCC)**, *see also* Labour-sponsored funds tax credit
- amalgamation or merger of, 127.4(1.1), 204.85
 - deemed to be mutual fund corporation, 131(8)
 - discontinuance of venture capital business, 204.8(2), 204.841
 - dissolution of, 204.85
 - no new applications accepted (federally) since March 21/13, 204.81(1)
 - prescribed, Reg. 6701
 - deemed not a public corporation unless listed, 89(1)“public corporation”(b), (c)
 - disposition of shares, capital loss, 40(2)(i)
 - exempt from Part IV tax, 186.1(b)
 - income eligible for dividend refund, 125(7)“specified investment business”
 - prescribed assistance, Reg. 6702
 - shares of
 - prescribed assistance, deduction from cost base, 53(2)(k)(i)(C)
 - province discontinuing LSVCC credit program, 204.81(8.3), (8.4)
 - provincial, tax on, 204.82(5)
 - registered, 204.8–204.87
 - deemed to be prescribed LSVCC, Reg. 6701(c)
 - defined, 248(1)
 - disposition of, clawback, 211.8
 - eligible investment, 204.8(1)
 - refund of tax where no monthly deficiency, 204.83
 - registration conditions, 204.81(1)
 - return and payment of tax, 204.86
 - revocation of registration, 204.81(6)–(9)
 - shares of
 - acquisition by RRSP, 127.4(1)“qualifying trust”, 127.4(3)
 - adjusted cost base not reduced by credit, 53(2)(k)(i)(C)
 - credit for purchase, 127.4
 - redemption restrictions, 204.81(1)(c)(vii)
 - transfer restrictions, 204.81(1)(c)(vii)
 - tax where insufficient eligible investments, 204.82
 - rules re, 131(11)
 - voluntary de-registration, 204.81(8.1)
- Labour union**, *see* Union
- Labrador**
- deduction for individuals residing in, Reg. 7303.1(1)(f)
- Land**
- adjusted cost base, additions to, 53(1)(h), (i)
 - allocation of proceeds of disposition between land and buildings, 13(21.1), 70(5)(d)
 - clearing, levelling, draining, 30
 - costs relating to ownership of
 - limitation on deductibility, 18(3.1)–(3.7)
 - defined
 - for restrictions on deductible expenses, 18(3)
 - generally, 70(5.2) (Notes)
 - donation of, *see* Ecological gifts
 - drainage system, deduction, 30
 - ecological, *see* Ecological gifts
 - interest on debt relating to acquisition of
 - defined, 18(3)
 - limitation on deductibility, 18(2)
 - inventory
 - cost to include non-deductible expenses, 10(1.1)
 - deceased taxpayer’s, 70(5.2)
 - meaning of, *see* “defined” (above)

Land (cont'd)

- not depreciable, Reg. 1102(2)
- rent paid before acquisition, deemed depreciable property, 13(5.2)(c)
- tillage of soil, 248(1)“farming”
- unproductive
 - • limitation on deductibility of expenses, 18(2)
- used in farming business, *see also* Farm land
 - • disposition of
 - • • loss, added to cost base, 111(6)
 - • • transferred to child on death, 70(9)
- used in farming business of partnership
 - • disposition of, 101

Land drainage system, deduction, 30**Land registry**

- lien on property for various debts owing, 223(5)–(11)

Landfill gas

- defined, Reg. 1104(13)
- included in eligible waste fuel, Reg. 1104(13)“eligible waste fuel”

Landscaping grounds

- deductible expense, 20(1)(aa)

Lapse-supported policy

- defined, Reg. 1408(1)

Large corporation

- appeal by, only on grounds raised in objection, 169(2.1)
- capital tax on, *see* Large corporations tax (Part I.3)
- defined, 225.1(8)
- notice of objection, requirements, 165(1.11)–(1.14)
- R&D investment tax credits limited, 127(10.2)
- required to remit 1/2 of taxes in dispute, 164(1.1)(d)(ii), 225.1(7)
- required to remit source withholdings through financial institution, 153(1), Reg. 110
 - • exception, 153(1.4)
- small business deduction limited, 125(5.1)(a)

Large corporations tax (Part I.3), 181–181.71 (before 2006)**Large employer**

- required to remit source withholdings through financial institution, 153(1), Reg. 110
 - • exception, 153(1.4)

Large print-on-screen device, for use by blind person

- disability supports deduction, 64(a)A(ii)(C)
- medical expense credit, Reg. 5700(o)

Laryngeal speaking aid, as medical expense, 118.2(2)(i)**Laser-disk, *see* Digital video disk (DVD)****Last, capital cost allowance, Reg. Sch. II:Cl. 12(d)****Late-filed elections or documents**

- detail on notice of objection, 165(1.12)
- generally, 220(3.2), Reg. 600
- resource taxation, 66(12.74)–(12.75)
- s. 85 rollover, 85(7)–(8)
- to trigger capital gain before corporation goes public, 48.1(3)

Late-filed return

- penalty, 162(1), 235

Lather (interior systems mechanic)

- apprenticeship job creation credit, 127(9)“investment tax credit”

Lavrinenko case overruled, 122.6“shared-custody parent”(b)**Law Society**

- bar admission examination fees, tuition credit, 118.5(1)(d)
- membership fees, deductible to employee, 8(1)(i)(i)

Lawyer

- appointed a judge, deferral of income, 24.1 [repealed]
- books and records required to be kept, 230(2.1)
- defined, 232(1), 248(1)

- examination fees to qualify as, tuition credit, 118.5(1)(d)
- incorporated, *see* Professional corporation
- income of, *see* Professional practice
- misrepresentation by, penalty, 163.2
- partnership, *see* Professional partnership
- solicitor-client privilege, 232
- trust account of, excepted from rule that trust paying no tax must file T3, 150(1.2)(c), 150(1.4)

Lead performer (for Canadian film/video tax credit)

- defined, Reg. 1106(8)(a)

Lead voice (for Canadian film/video tax credit)

- defined, Reg. 1106(8)(b)

Leads (given to CRA), *see* Informant payments**Leaf tobacco**

- processing, exempt from tobacco manufacturers' surtax, 182(2)“exempt activity”(b)

Learning disability

- tutoring for
 - • disability supports deduction, 64(a)A(ii)(H)
 - • medical expense credit, 118.2(2)(1.91)

Lease

- financing, *see* Direct financing lease
- option to purchase, *see* Option

Lease cancellation payment, 13(5.5), 20(1)(z), (z.1)

- amalgamation, on, 87(2)(j.5)
- limitation on deductibility, 18(1)(q)

Lease financing amount

- defined, for interest deduction restrictions, 18.2(1)
- subject to deduction restrictions, 18.2(1)“interest and financing expenses”A(f)

Lease inducement payments

- taxable as income, 12(1)(x)

Lease-leaseback arrangement

- rental payments included in cost for CCA, 13(5.4)

Lease obligation

- defined, for FAPI rules, 95(1)
- income of foreign affiliate from, 95(2)(a.3)

Leasehold interest, *see also* Interest (in property, etc.)

- capital cost allowance, Reg. 1100(1)(b), 1102(4)–(6), Reg. Sch. II:Cl. 13, Reg. Sch. III
- deemed disposition of, 13(5.1)
- property acquired, rules, 13(5.1)
- separate classes, Reg. 1101(5h)

Leasing costs

- non-resident withholding tax, 212(1)(d)
- passenger vehicle
 - • limitation on deductibility, 67.3
 - • • where more than one lessor, 67.4

Leasing properties

- amalgamations, 16.1(4)
- assignments, 16.1(2), (3)
- capital cost allowance, Reg. 1100(15)–(20), 1101(5c)
- defined, Reg. 1100(17)–(20)
 - • non-arm's length exception, Reg. 1102(20)
- minimum tax, 127.52(1)(b), (c.2)(ii), 127.52(3)“rental or leasing property”
- replacement property, 16.1(5)–(7)
- rules re, 16.1
- rules where election filed, 16.1(1)–(4)
- subleases, 16.1(2), (3)
- windings-up, 16.1(4)

Leave of absence, *see* Sabbatical arrangement**Leaving Canada, *see* Ceasing to be resident in Canada****Lebanon, *see also* Foreign government**

- universities, gifts to, Reg. Sch. VIII, s. 9

Legal costs, *see also* Court: costs

- collecting or establishing right to pension benefit
 - • deduction for, 60(o.1)
 - • reimbursement of, taxable, 56(1)(l.1)
- collecting or establishing right to retiring allowance or severance pay
 - • deduction for, 60(o.1)
 - • reimbursement of, taxable, 56(1)(l.1)
- collecting or establishing right to wages
 - • deduction for, 8(1)(b)
 - • reimbursement of, taxable, 6(1)(j)
- conducting appeal, of, 60(o)
- deductible, 8(1)(b), 20(1)(e), 20(1)(cc), 60(o), (o.1), 62(3)(f), 118.2(2)(l.1)(i)
- financing, 20(1)(e)
- income when awarded or reimbursed, 6(1)(j), 56(1)(l), (l.1)
- lobbying, 20(1)(cc)
- moving expenses, 62(3)(f)
- objecting to assessment, 60(o)
- objecting to determination, 152(1.2)
- purchase of new home, 62(3)(f)
- relating to organ or bone marrow transplant, 118.2(2)(l.1)(i)
- representation expenses, 20(1)(cc)
- seizure of chattels, 225(2), (4)

Legal documents

- cost of revising for change of address, deduction, 62(3)(f)

Legal representative

- appropriation of property by, 159(3.1)
- clearance certificate, 159(2)
- defined, 248(1)
- liability for taxpayer's obligations, 159(1), (3)
- obligations of, 159(1)

Legal representative of deceased taxpayer

- application to Minister re vesting of properties, 70(5.2), (6), (9), (9.2)
- election re amounts receivable, 70(2)
 - • revocation of, 70(4)
- election re losses, 164(6)
 - • reassessment, 152(6)
- election re payment of tax in instalments, 159(5)–(7)
- election re reserves, 72(2)
- information return, Reg. 206
- return of income, when due, 70(7)

Legislation

- amendment of, *see* Amendment
- citation of, *Interpretation Act* s. 40
- deemed remedial, *Interpretation Act* s. 12
- definitions, effect of, *Interpretation Act* s. 15
- headings or titles, *Interpretation Act* s. 14
- in-force date, *see* Amendments: when in force
- interpretation of, *Interpretation Act*
- marginal notes, *Interpretation Act* s. 14
- repeal of, *Interpretation Act* s. 43–45
- titles of sections, *see* Marginal notes

Legislative assembly (or Legislature)

- defined, *Interpretation Act* s. 35(1)
- member of, expense allowance exempt, 81(2) [before 2019]

Lehigh Cement case overruled, 212(1)(b)(i)(B)**Lending asset**, *see also* Specified debt obligation

- cost amount of, 248(1)“cost amount”(d.1)
- defined, 248(1)
- for FAPI purposes, 95(1)“lending of money” closing words

Lending of money, *see also* Loan

- defined, for FAPI rules, 95(1)

Lesbian couples, *see* Common-law partner**Level-yield method (for allocation return from specified debt obligation)**

- defined, Reg. 9102(2)

Leveraged insured annuity, *see* LIA policy**Leveraged leasing, CCA restrictions**, Reg. 1100(15)–(20)**Lewin case overruled**, 214(3)(f)(i)(C)**Liabilities**

- determination of, for debt forgiveness reserve, 61.3(1)(b)C(ii)

Liability for tax

- alternative minimum tax, 127.5
- failure to withhold tax on payment to non-resident, 215(6)
- general, 2
- income from property transferred at non-arm's length, on, 160(1)–(3)
- income-splitting tax, 120.4(2)
- income trusts distributions tax, 122(1)(b)
- joint and several
 - • assessment of, 160.1(3)
 - • charitable organization and charitable foundation, 188(4)
 - • charity making gift to second charity to delay expenditures, 188.1(11)
 - • charity revocation tax, 188(2)
 - • debt forgiveness reserve, asset transfer, 160.4
 - • debtor and transferee following transfer of forgiven amount, 80.04(11)
 - • directors and corporation, source withholdings and other amount, 227.1
 - • excessive election re capital dividend or capital gains dividend, 185(4), (6)
 - • excessive eligible dividend designation, 185.2(3), (5)
 - • GST credit overpayment, 160.1(1.1)
 - • income-splitting tax, 160(1.2)
 - • legal representative and taxpayer, 159(1)
 - • non-resident trust, Canadian beneficiary and contributor, 94(3)(d)(i)
 - • Part III tax, 185(4), (6)
 - • Part III.1 tax, 185.2(3), (5)
 - • payor and non-resident, withholding tax, 227(8.1)
 - • person responsible for withholding taxes, 227(5)
 - • property transferred not at arm's length, 160(1)
 - • property transferred to use other taxpayer's benefit, 160(1.1)
 - • RCA benefits received by another, 160.3
 - • RRIF, amounts received under, 160.2(2)
 - • RRSP, amounts received under, 160.2(1)
 - • reportable avoidance transactions penalty, 237.3(9), (10)
 - • secured creditor, for remittances, 227(5.2)–(5.4) (1995 draft, abandoned)
 - • transferred Part VI.1 tax, 191.3(1)(e)
 - • trustee and person whose property is being managed, withholding, 227(5), (5.1)
 - • trustee in bankruptcy and bankrupt corporation, 128(1)(e)
 - • UI premium tax credit, 160.1(2.2)
- minimum tax, 127.5
- non-resident corporation
 - • carrying on business in Canada, 219
 - • not affected by incorrect assessment, 152(3)
- Part I, 2
- Part I.2, 180.2(2)
- Part II, 182(1)
- Part II.1, 183.1(2)
- Part III, 184
- Part III.1, 185.2
- Part IV, 186(1)
- Part IV.1, 187.2, 187.3(1)
- Part V, 188
- Part VI, 190.1(1), (1.1), (1.2)
- Part VI.1, 191.1(1)
- Part IX, 196(1)
- Part IX.1, 197(2)

Liability for tax (*cont'd*)

- Part X, 198(1), (3), 199(1), 201
- Part X.1, 204.1
- Part X.2, 204.6
- Part X.3, 204.82(1)–(3), (5), (6), 204.841
- Part X.4 tax, 204.91
- Part X.5 tax, 204.94(2)
- Part XI.01, 207.02, 207.03, 207.04(1), (6), 207.05(1), (3)
- Part XI.1, 207.1
- Part XI.2, 207.3
- Part XI.3, 207.7(1)
- Part XI.4, 207.8(2)
- Part XI.5, 207.9(2)
- Part XII.1, 209(2)
- Part XII.2, 210.2(1), 211.81
- Part XII.3, 211.1(1)
- Part XII.4, 211.6(2)
- Part XII.5, 211.8(1), 211.81
- Part XII.6, 211.91(1)
- Part XIII, 212
- Part XIII.1, 218.2(1)
- Part XIII.2, 218.3(2)
- Part XIV, 219
- partnerships distributions tax, 197(2)
- transfer of property to spouse or minor, 160(1)
- trustee, etc., 159

Library books

- capital cost allowance, Reg. Sch. II:Cl. 12(a)

License

- capital cost allowance, Reg. 1100(1)(c), Reg. Sch. II:Cl. 14
- representation expense, 13(12), 20(1)(cc), 20(9)

Licensed annuities provider

- defined, 147(1), 248(1)
- RESP-eligible investments, 146.1(1)“qualified investment”(c)
- RRIF-eligible investments, 146.3(1)“qualified investment”(b.1), (b.2)
- RRSP-eligible investments, 146(1)“qualified investment”(c)–(c.2)

Licensing of property

- defined, for FAPI rules, 95(1)

Lieutenant governor

- defined, *Interpretation Act* 35(1)
- pension plan, Reg. 8309
- RRSP contribution room, Reg. 8309(1)

Life annuity

- for disabled person, rollover to RRSP, 60.011(2)(b)

Life estate in real property

- defined, 43.1(1)
- effect of retaining, 43.1(1)
- termination of, 43.1(2), 53(1)(o)

Life income fund, see Registered retirement income fund**Life insurance, see also Life insurance corporation; Life insurance policy**

- business, defined, 248(1)
- definitions, 148(9)
- group plan, whether premiums an employment benefit, 6(1)(a)(i), 6(4)
- net cost of pure insurance, Reg. 308
- policy, *see* Life insurance policy
- policy loan, *see* Policy loan (life insurance)
- policyholder
 - “adjusted cost basis” of policy, 148(9)“adjusted cost basis”
 - “child” of, 148(9)
 - deemed dispositions, 148(2)
 - disposition of interest at non-arm’s length, 148(7), (8)
 - disposition of part of interest, 148(4)
 - income from disposition of interest in policy, 148(1), (4)

- premiums, *see* Premium
- proceeds received as annuity, 148(6)
- “relevant authority” defined, 148(9)
- rules re certain policies, 148(3)

Life insurance capital dividend, see also Capital dividend account

- brought into capital dividend account, 89(1)“capital dividend account”(e)
- defined, 248(1)

Life insurance corporation, see also Insurance corporation

- accounting rule changes, transitional rules, 138(16)–(25)
- accumulated 1968 deficit, defined, 138(12)
- building under construction etc., amount included in income re, 138(4.4)–(4.6), Reg. 2410
- capital gain on pre-1969 property, 138(11.2)
- capital tax, 190.1(1)
- change in use rules, 138(11.3), (11.4), (11.41), (11.6); ITAR 26(17.1)
- computation of income, 138(1)–(6)
- deductions, 138(3), Reg. 1401
 - Part XII.3 tax, 138(3)(g)
- deemed a public corporation, 141(2)
- defined, 248(1)
- definitions, 138(12)
- demutualization, 139.1
- dividends from taxable corporations, 138(6)
- foreign taxes not deductible, 138(5.1), (8)
- identical properties of, 138(11.1)
- information returns, Reg. 217
- maximum tax actuarial reserve, 138(12)
- non-resident, 219(4)–(8), Reg. 2401
 - branch tax elections, Reg. 2403
- provincial, conversion to mutual corporation, 139
- real property, vacant or under development, amount included in income re, 138(4.4)–(4.6) Reg. 2410
- “relevant authority” defined, 138(12)
- reserves, 138(3)(a), Reg. 1400–1408
 - policy reserves, 138(3)(a)(i)
 - post-1995 policies, Reg. 1404
 - pre-1996 policies, Reg. 1401(1)
 - unpaid claims, 138(3)(a)(ii)
 - post-1995 policies, Reg. 1405
 - pre-1996 policies, Reg. 1401(4)
- rules applicable to, 138
- segregated funds of, 138.1, Reg. 6100
- tax on investment income, 211–211.5
 - Canadian life investment income, 211.1(3)
 - interest on overdue tax, 211.5
 - payment of tax, 211.4, 211.5
 - rate of tax, 211.1(1)
 - return, 211.2
 - taxable Canadian life investment income, 211.1(2)
- taxable income of, 138(7)
- transitional rules for accounting rule changes, 138(16)–(25)

Life insurance policy, see also Annuity contract

- accrued income, 12.2
 - amounts included in income on anniversary, 12.2(1)
 - anniversary day, defined, 12.2(11)
 - deduction for over-accrual, 20(20)
- acquisition costs of
 - not deductible to insurer, 18(9.02)
- “adjusted cost basis” of, to policyholder, 148(9)
- anniversary day, defined, 12.2(11)
- annuity, proceeds received as, 148(6)
- charity designated as beneficiary, 118.1(5.2)(a)
- corporation beneficiary under, where, 89(2)
- deemed disposition of, 148(2)
- defined, 12.2(10), 138(4.01), 138(12), 211(1), 248(1), Reg. 1408(1)

- Life insurance policy (*cont'd*)
 - in Canada, 138(12), 211(1), 248(1), Reg. 1408(1)
 - registered, 211(1)
 - disposition by non-resident
 - certificate, 116(5.2)
 - presumption, 116(5.4)
 - purchaser liable for tax, 116(5.3)
 - rules, 116(5.1)
 - disposition of
 - amount included in income, 148(1.1)
 - deduction, 20(20)
 - defined, 148(9)“disposition”, 248(1)“disposition”(b.1)
 - no capital gain, 39(1)(a)(iii)
 - no capital loss, 39(1)(b)(ii)
 - non-arm’s length, 148(7), (8)
 - policyholder’s income, 148(1), (4)
 - proceeds of
 - defined, 148(9)“proceeds of the disposition”
 - income, 56(1)(j)
 - distribution of proceeds
 - by corporation, 89(1)“capital dividend account”(d)(iii)
 - by partnership, 53(1)(e)(iii)
 - dividends, 148(2)
 - enhanced capital gains deduction, effect on, 110.6(15)
 - exempt policy, Reg. 306
 - defined, 12.2(11)
 - group term, defined, 248(1)
 - in Canada, defined, 138(12), 211(1), 248(1), Reg. 310, 1408(1)
 - income from, 148
 - interest in
 - amount to be included, 12.2(1)
 - owned under deferred profit sharing plan, 198(6)–(8)
 - “value” defined, 148(9)“value”
 - life annuity contract, 148(10)
 - loan, *see* Policy loan (life insurance)
 - mortality gains and losses, Reg. 308
 - net cost of pure insurance, Reg. 308
 - participating, *see* Participating life insurance policy
 - premium, *see* Premium
 - “prescribed increase” in benefit on death under, Reg. 309(2)
 - prescribed premium, rules, Reg. 309
 - proceeds of the disposition of, defined, 148(9)
 - retirement compensation arrangement funded by, 207.6(2)
 - riders, 12.2(10)
 - rollover
 - to child, 148(8)
 - to spouse, 148(8.1), (8.2)
 - segregated fund, 138.1, Reg. 6100
 - defined, 138(12)
 - “tax anniversary date” defined, 148(9)
 - third anniversary amounts, defined, 12.2(11)“anniversary day”
 - transfer not at arm’s length, 89(1)“capital dividend account”(d)(v), 148(7)
 - transfer to child, 148(8)
 - transfer to spouse
 - breakdown of marriage, on, 148(8.1)
 - death, on, 148(8.2)
 - value of, for valuing shares etc. on death, emigration or immigration, 70(5.3)
- Life insurance policy in Canada**, *see* Life insurance policy: in Canada
- Life insurer**, *see also* Life insurance corporation
 - defined, 248(1)
- Life interest**, *see* Life estate in real property
- Life interest trust**, *see* Alter ego trust
- Lifelong Learning Plan**, 146.02
 - definitions, 146.01(1)
 - income inclusions, 56(1)(h.2), 146.02(4)–(6)
 - repayment of amount borrowed from RRSP, 146.02(3)
 - withdrawal of funds from RRSP, 146(8), Reg. 104.1
 - within 90 days of contribution, deduction disallowed, 146(5)(a)(iv.1), 146(5.1)(a)(iv)
 - withholding exemption, Reg. 104.1
- Lifetime benefit trust**
 - defined, 60.011(1)
- Lifetime disability assistance payments**
 - defined, 146.4(1)
- Lifetime retirement benefits**
 - defined, Reg. 8500(1)
- Lift, power-operated (for wheelchair etc.)**
 - medical expense, Reg. 5700(m)
- Lift truck, industrial**
 - capital cost allowance, Reg. Sch. II:Cl. 29
- Limitation of benefits rule**, Canada-U.S. Tax Treaty:Art. XXIX-A
- Limitation periods**, *see also* Filing deadlines; Reassessment; Statute-barred debt, deemed settled; Table O-6 at beginning of book
 - collection of tax debt, 10 years, 222(4)
 - prosecution for offences, 244(4)
 - requesting adjustment to past return, 10 years, 152(4.2)
 - requesting past Canada Child Benefit, 10 years, 122.62(2)
 - requesting refund of past year, 10 years, 164(1.5)
 - requesting waiver of interest or penalty, 10 years, 220(3.1)
- Limited-dividend housing company**
 - defined, Reg. 3700
 - exemption, 149(1)(n)
- Limited liability company (U.S.)**
 - equity interests treated as shares, 93.2(2)
 - look-through for treaty purposes, Canada-U.S. Tax Treaty:Art. IV:6
 - treated as corporation, 248(1)“corporation”
 - treated as foreign affiliate, Reg. 5907(11.2)(b)
- Limited liability partnership**
 - at-risk rules inapplicable, 96(2.4)(a)
 - capital gain not triggered by negative ACB, 40(3.14)(a)
 - United Kingdom, Canada-UK treaty Interpretative Protocol (2014)
- Limited partner**, *see also* Limited partnership; Specified member (of partnership)
 - at-risk rules, 96(2.1)–(2.7)
 - deemed capital gain on negative adjusted cost base, 40(3.1)(a)
 - deemed not to carry on partnership’s business, 253.1
 - defined, 96(2.4)
 - for investment tax credit, 127(8.5)
 - for minimum tax purposes, 127.52(3)
 - for partnership interest negative ACB, 40(3.14)
 - for tax shelter investments, 143.2(1)
 - investment tax credit, 127(8.1)
 - limit on cost of investment, 143.2(1)“tax shelter investment”(b), 143.2(6)
 - minimum tax, 127.52(1)(c.1)
 - research and development losses, 96(1)(g)
 - resource expenses, 66.8
- Limited partnership**, *see also* Limited partner; Partnership; Tax shelter: investment
 - debt of, qualified investment for RRSP etc., Reg. 4900(1)(n.01)
 - deemed not a business of the partner, 253.1
 - losses, *see* Limited partnership losses
 - mutual fund commissions financing, 18.1
 - service of documents on, 244(20)(b)(ii)(A)
 - unit
 - qualified investment for RRSP etc., Reg. 4900(1)(n)
 - small business investment, Reg. 5102

Limited partnership losses, *see also* Limited partnership

- adjusted cost base of partnership interest, reduction for, 53(2)(c)(i.1)
- amalgamation, on, 87(2.1)(a), (b)
- at-risk amount, 96(2.1)
- artificial transactions to increase, 96(2.6), (2.7)
- defined, 96(2.2)
- carryforward of, 111(1)(e)
- deductibility, 96(2.1)
- limitation on, 111(3)(a)
- defined, 96(2.1), 248(1)
- determination of, by Minister, 152(1.1), (1.2), (1.3)
- minimum tax, 127.52(1)(c.1)
- order of deduction, 111(3)(b)
- partnership interest acquired by subsequent person, 96(2.3)
- winding-up, on, 88(1.1)

Limited partnership unit, *see* Limited partnership: unit**Limited-recourse amount**

- defined, for tax shelter investments, 143.2(1), (7)

Limited-recourse debt

- application to definition of tax shelter, 237.1(1)“gifting arrangement”(b)
- application to determination of advantage received, 248(32)(b)
- defined, 143.2(6.1)
- repayment of, 248(34)

Linefill

- in pipeline, no CCA, Reg. 1102(1)(k)

Linen

- capital cost allowance, Reg. Sch. II:Cl. 12(g)

Linked note

- sale of
- deemed interest inclusion, 20(14.2)
- information return, Reg. 201(1)(g)

Liquefaction of natural gas, *see also* Eligible liquefaction facility

- income from, determination of, Reg. 1104(18)

Liquefied natural gas

- facility for, *see* Eligible liquefaction facility

Liquid biofuel

- defined, Reg. 1104(13)

Liquidation entitlement

- defined
- capital gains deduction, Reg. 6205(1)(a)(i)(B), 6205(4)(b)
- flow-through shares, Reg. 6202.1(1)(a)(ii), 6202.1(1.1)(a), 6202.1(3)(b)
- taxable preferred shares, 248(1)“taxable preferred share”(b)(ii)
- taxable RFI shares, 248(1)“taxable RFI share”(b)

Liquidator, *see also* Legal representative

- certificate before distribution, 159(2)
- deemed to be legal representative, 248(1)“legal representative”
- obligations of, 159
- return required by, 150(3)
- withholding tax, liability for, 227(5), (5.1)

List of amounts, *see* Dollar amounts in legislation and regulations**List of taxes and tax rates**, *see* Rates of tax**Listed country**

- for foreign affiliate purposes, Reg. 5907(11)–(11.2)

Listed election

- defined, Reg. 5911(2)

Listed financial institution

- defined
- for Canadian reporting of US persons’ interests in accounts, 263(1)

Listed international agreement

- disclosure of information as permitted by, 241(4)(e)(xii)

Listed personal property, *see also* Art; Personal-use property

- defined, 54
- loss from
- defined, 41(3)
- reassessment, 152(6)(b)
- usable only against LPP gains, 3(b)(ii), 41(2)
- net gain from disposition, 41(2)

Listed securities, *see* Publicly-traded securities**Listed terrorist entity**

- ceasing to be, 149.1(1.02)
- defined, 149.1(1)
- individual ineligible to be director of charity, 149.1(1)“ineligible individual”(e)–(h)
- revocation of charity, 168(3.1)
- deemed year-end on notice of revocation, 188(1)

Literary work, copyright royalties

- no withholding tax, 212(1)(b)(vi), 212(9)(b)

Litigation, costs of, *see* Court: costs**Little Egypt bump**

- prevention of, 98(5)(d) [repealed]

Liver extract, as medical expense, 118.2(2)(k)**Livestock**

- destruction of
- deferral of income from, 80.3(2)
- exceptions, 80.3(6)
- inclusion of deferred amount, 80.3(3)
- amalgamation, on, 87(2)(tt)
- exhibiting and raising, 248(1)“farming”
- sales of, in prescribed drought or flood region, *see* Drought or flood region: prescribed

Living together, deemed spouses, *see* Common-law partner**Loan**, *see also* Borrowed money; Debt; Interest (money)

- acquired in ordinary course of business of insurer or moneylender, 20(27)
- back-to-back, to spouse or minor, 74.5(6)
- charity, by, 118.1(16)
- corporation to, to reduce income, 74.4(2)
- outstanding amount, 74.4(3)
- cost amount of, 248(1)“cost amount”(d.1)
- employee, to, included in income, 6(9), 80.4(1)
- foreign affiliate’s income from, 95(2)(a.3)
- forgiveness of, *see* Debt forgiveness
- guarantee fee, deductible, 20(1)(e)
- home purchase, *see* Home purchase loan
- interest-free or low-interest
- to child, 74.1(2)
- to employee, 80.4(1)
- to non-arm’s length person, 56(4.1)
- to non-resident, 17
- to shareholder, 15(2)–(2.6)
- to spouse, 74.1(1)
- inventory write-down restricted, 18(1)(s)
- minor, to, 74.1(2), 74.5(6)–(11)
- for value, 74.5, (2)
- repayment of, 74.1(3)
- non-arm’s length person, to, 56(4.1)–(4.3)
- used to repay existing indebtedness, 56(4.3)
- non-resident, to, by corporation, 17
- partnership interest, of, 96(1.8)
- personal services business, to
- inclusion in income, 12(1)(w)
- policy, repayment of, 60(s)
- reduction in value of
- limitation on deduction re, 18(1)(s)
- related person, to, *see* non-arm’s length person (*above*)
- shareholder, to, by corporation, 15(2)–(2.6), 80.4(2)
- back-to-back rules, 15(2.16)–(2.192)

- Loan** (*cont'd*)
- capacity test, 15(2.4)(e)
 - deemed benefit, 15(9)
 - exception for “pertinent loan or indebtedness”, 15(2.11), 17.1
 - forgiveness of, 15(1.2)
 - from foreign affiliate, 90(6)–(15)
 - non-residents, 15(2.2), (8), 227(6.1)
 - persons connected with, 80.4(8)
 - repayment of, 20(1)(j)
 - spouse, to, 74.1(1)
 - for value, 74.5(2)
 - repayment of, 74.1(3)
 - value, for, to non-arm’s length person, 56(4.2)
 - wholly-owned subsidiary, to, 17, 218
- Loanbacks**
- property or money donated to charity, 118.1(16)
- Lobbying**, *see* Representation expenses
- Local**
- of union, deemed same employer as union, 252.1
- Local Lockdown Program (COVID-19)**
- wage and rent subsidies, 125.7(1)“base percentage”(l)(i)(B)(II), (m)(i)(B)(II)
- Lockdown support (COVID-19)**, 125.7(2.1)B
- Locked-in annuity**
- held by RRIF, 146.3(1)“qualified investment”(b.2)
- Locked-in retirement account**, 147.3(1) (Notes)
- Locomotive**, *see* Railway: locomotive
- Lodge, expense of, not deductible**, 18(1)(l)
- Lodging**, *see* Board and lodging
- Logging equipment**, Reg. Sch. II:Cl. 10(o)
- Logging operations**
- income from, in the province, defined, 127(2)“income for the year from logging operations in the province”
- Logging property**
- investment tax credit, 127(9)“qualified property”(c)(iii)
- Logging tax**
- deduction from income tax, 127(1), Reg. Part VII
 - defined, 127(2)
 - provincial legislation imposing, Reg. 700(3)
 - rules applicable to, 127(1)
- Long-haul truck**
- defined, for meals percentages, 67.1(5)
- Long-haul truck driver**
- defined, 67.1(5)
 - food and beverages, percentage allowed, 67.1(1.1)
- “Long-term debt” defined**, 181(1), 190(1)
- Long-term resident**
- defined, Canada-U.S. Tax Treaty:Fifth Protocol (2007), Annex B, para. 11
- Look-back rule (for flow-through shares)**
- interest charged as tax, 211.91(1)
 - renunciation permitted, 66(12.66)(a.1)
- Look-through rule (for partnerships)**, *see* Tiers of partnerships
- Loss(es)**
- amalgamation, on, 87(2.1)
 - capital, *see* Capital loss
 - carryback, *see* Carryback
 - carryforward, *see* Carryforward
 - carryover of, 111
 - corporation or trust, by, 111(5)–(5.5)
 - anti-avoidance provision, 111(5.5)(b)
 - change in control of corporation, 111(4)
 - farming business, from, 111(1)(c), (d), 111(6), (7)
 - restricted, for corporation becoming or ceasing to be exempt, 149(10)(c)
 - defined, for disposition of specified debt obligation, Reg. 9200
 - determination of, by Minister, 152(1.1), (1.2), (1.3)
 - disposition of debt in exchange for replacement obligation, 40(2)(e.2)
 - disposition of debt owing by related person, deemed nil, 40(2)(e.1)
 - disposition of share of, foreign affiliate, on, 93(2)–(4)
 - farm, defined, 111(8)
 - farming, *see also* Farm loss
 - after land disposed of, 111(6)
 - carryover of, 111(1)(d)
 - deduction limited, 31
 - effect on cost base of land, 53(1)(i)
 - limitation on deductibility, 111(3), (6), (7)
 - partnership, of, 101, 111(7)
 - reduction on debt forgiveness, 80(3)(b), (c)
 - restricted farm loss, *see* Restricted farm loss
 - fishing, 111(8)“farm loss”A(a)(i), *see also* Farm loss
 - foreign affiliate, of
 - deductible, Reg. 5903
 - defined, Reg. 5907(1)
 - foreign bank’s Canadian affiliate, 142.7(12)
 - housing, *see* Housing loss
 - insurer’s, 138(2)
 - limitations on deductibility, 111(3), *see also* Stop-loss rules
 - net capital, *see* Net capital loss
 - non-capital, *see* Non-capital loss
 - office or employment, from, 5(2)
 - order of reduction, on settlement of debt, 80(2)
 - place, from sources in, 4
 - post-emigration, 128.1(8)
 - reduction of, on property previously owned by trust, 107(6)
 - restrictions on deductibility, *see* Loss restriction event; Stop-loss rules
 - share that is capital property, on, 112(3), (4)
 - source, from, 4
 - stop-loss rules, *see* Stop-loss rules
 - superficial
 - business of lending money, 18(13), (15)
 - capital property, 40(2)(g)(i), 54
 - defined, 54
 - inventory held as adventure in nature of trade, 18(14)–(16)
 - terminal
 - deduction for, 20(16)
 - no deduction re motor vehicle, 20(16.1)
 - transfer of, *see* Suspension of losses; Transfer of losses
 - windup, on, 88(1.1)
- Loss of income source, deduction for interest expense**, 20.1
- Loss offset program**, *see* Fuel tax rebate (1992–1999)
- Loss restriction event**, *see also* Control of corporation: change of
- deemed acquisition of control of corporation, 256(7), (8)
 - deemed year-end, 249(4)
 - defined, 251.2
 - loss carryovers restricted
 - bad debts, 111(5.3), (5.5)
 - business losses, 111(5)
 - capital losses, 40(3.4)(b)(iii), 53(2)(b.2), 111(4), (5.5), 111(8)“net capital loss”C(c), 111(12)
 - cumulative unused excess capacity (for interest deduction restrictions), 111(5.01)
 - debt forgiveness, 80(1)“relevant loss balance”(b), 80(1)“unrecognized loss”, 80(15)(c)(iv), 80.04(4)(h)
 - depreciable property, 13(21.2)(e)(iii)(D), 13(24), (25), 111(5.1), (5.5)
 - doubtful debts, 111(5.3)
 - farm losses, 111(5), (5.5)
 - foreign currency debt, 111(12)
 - interest deduction restrictions, 111(5), (5.01)

Loss restriction event (*cont'd*)

- inventory, 10(10), (11)
- investment tax credit, 127(9)“investment tax credit”(j), (k), 127(9.1), (9.2)
- matchable expenditure rules, 18.1(1)(b)(ii)
- net capital losses, *see* capital losses (above)
- non-capital losses (business losses), 111(5)
- resource expenditures, 66(11.4)–(11.6)
- SR&ED expenditures, 37(1)(h), 37(6.1)
- superficial loss, 54“superficial loss”(f)
- undepreciated capital cost, 111(5.1)

Lottery

- capital gain or loss nil, 40(2)(f)
- cost of prize won is its fair market value, 52(4)
- prize winnings, not taxed (no taxing provision)

Low rate income pool

- after amalgamation, 87(2)(ww), 89(9)
- after windup, 87(2)(ww), 88(1)(e.2)(ix), 89(10)
- defined, 89(1), 248(1)
- addition on amalgamation, 87(2)(ww), 89(9)
- addition on ceasing to be CCPC, 89(8)
- addition on windup, 87(2)(ww), 88(1)(e.2)(ix), 89(10)
- dividend paid from, 89(1)“eligible dividend”, “excessive eligible dividend designation”

Lower value account

- defined, for Common Reporting Standard, 270(1)

Lump-sum payment

- employment income
- defined, Reg. 103(6)
- withholding of tax, Reg. 103(4)
- retroactive spreading over past years
- addition to tax for earlier years, 120.31
- deduction in current year, 110.2

Lump-sum premium

- defined, Reg. 2700(1)

Luxembourg, *see also* Foreign government

- stock exchange recognized, 262

Luxury Items Tax, 18(1)(t) (Notes)

- interest paid under, not deductible, 18(1)(t)(iv)

Luxury vehicle, *see* Luxury Items Tax; Passenger vehicle: luxury

M

M&P, *see* Manufacturing or processing: credit

METC, *see* Medical expenses [tax credit]; Mineral Exploration Tax Credit

MFPP, *see* Member-funded pension plan

MIB, *see* Majority-interest beneficiary

MIC, *see* Mortgage investment corporation

MIGB, *see* Majority-interest group of beneficiaries

MLA, *see* Member: legislative assembly

MLI [Multilateral Instrument], *see before* Canada-US Tax Treaty

MNE group, *see* Multinational enterprise group

MP, *see* Member: Parliament

MPP, *see* Member: legislative assembly; Money purchase provision

MURB, *see* Multiple-unit residential buildings

Machine part, cutting or shaping

- capital cost allowance, Reg. Sch. II:Cl. 12(j)

Machinery and equipment

- capital cost allowance for, Reg. Sch. II:Cl. 8, Sch. II:Cl. 29

Machinist

- apprenticeship job creation credit, 127(9)“investment tax credit”

MacMillan Bloedel case overruled, 39(2) opening words

Magazine advertising

- limitation, 19.01

Mail

- notice of objection, 165(2)
- presumption re mailing date, 244(14)
- proof of service by, 244(5)
- receipt of things mailed, 248(7)

Maintenance, *see* Support payments (spousal or child)

Maintenance costs

- automobile, *see* Automobile: operating costs
- trust property, of, 105(2)

Majority-interest beneficiary

- defined, 251.1(3), 251.2(1)

Majority-interest group of beneficiaries

- defined, 251.1(3), 251.2(1)

Majority-interest group of partners

- defined, 251.1(3), 251.2(1)

Majority-interest partner

- acquisition of control of corporation that is, 13(24), 66(11.4)
- capital loss denied on disposition to partnership, 40(3.3), (3.4)
- defined, 248(1)

Malta, *see also* Foreign government

- film or video under treaty co-production, Reg. 1106(3)(e)

Management fee

- paid to non-resident, 212(1)(a)
- defined, 212(4)
- whether deductible, 67 (Notes)

Mandatory disclosure, 237.3, 237.4, 237.5, *see also* Notifiable transaction; Reportable transaction; Uncertain tax treatment

Manitoba, *see also* Province

- labour-sponsored venture capital corporation of
- prescribed, Reg. 6700(a)(iii), (xii)
- recovery of LSVCC credit, 211.7
- *Mineral Exploration Incentive Program Act*, assistance under, Reg. 6202.1(5)“excluded obligation”(a)(i)
- northern, *see* Northern Canada
- prescribed stock savings plan, Reg. 6705(e)
- Rural Development Bonds, eligible for RRSP investment, Reg. 4900(1)(i.1)
- tax rates, *see* introductory pages

Manrell case overruled, 56.4

Manufacturing or processing

- assets, capital cost allowance, Reg. Sch. II:Cl. 43
- building used for, additional CCA, Reg. 1100(1)(a.1)
- business
- deemed capital cost of property acquired for, 13(10)
- credit, 125.1, Reg. Part LII
- defined
- for Class 29 CCA, Reg. 1104(9)
- for investment tax credit, 127(11)(a)
- for M&P credit, 125.1(3)“manufacturing or processing”
- for manufacturing and processing credit, 125.1(3)“manufacturing or processing”
- property used in, capital cost allowance, Reg. 1102(15), (16), (16.1), Reg. Sch. II:Cl. 29, Sch. II:Cl. 43
- separate class for each property if election made, Reg. 1101(5s)
- tobacco, surtax on, 182, 183

Marginal notes

- effect of, *Interpretation Act* s. 14
- relevance to legislation, *Interpretation Act* s. 14

Marihuana, *see* Marijuana

Marijuana

- medical expense credit, 118.2(2)(u)

Marina relief (COVID), Reg. 8901.1(2)(b)(ix)(A)(III), *see also* Qualifying tourism or hospitality entity

Marine railway

- capital cost allowance, Reg. Sch. II:Cl. 7

Mark-to-market property, 142.5, *see also* Specified debt obligation

- amalgamation, effect of, 87(2)(e.4), (e.5)
- annual recognition of gain or loss, 142.5(2)
- cost amount of, 248(1)“cost amount”(c.1)
- debt obligation, interest on, 142.5(3)
- deemed disposition of, 142.5(2)
- defined, 142.2(1)
- for stop-loss rules, 112(6)(c)
- where election made re derivatives, 10.1(4)(a)
- disposition of
 - adjustment for dividends received, 112(5)–(5.2)
 - deemed
 - annual, 142.5(2)
 - on windup, 88(1)(i)
 - income treatment, 142.5(1)
 - no capital gain, 39(1)(a)(ii.2)
 - no capital loss, 39(1)(b)(ii)
- mark-to-market treatment required, 142.5(2)
- rollover not permitted, 85(1.1)(g)(iii)
- stop-loss rules restricted, 112(5.6)
- superficial loss rule not applicable, 142.6(7)
- winding-up, effect of, 88(1)(a.3), (h), (i)

Mark-to-market treatment

- eligible derivative, by election, 10.1
- financial institution’s property, 142.5(2)

Markedly restricted

- defined, for disability credit, 118.3(1)

Marketing board

- patronage dividends where board used, 135(8)

Markevich case overruled, 222(3)–(10)**Marriage**, *see also* Spouse; Common-law partner

- breakdown of, *see* Divorce and separation
- meaning of, *Civil Marriage Act* s. 2
- notice to CRA required for Canada Child Benefit purposes, 122.62(7)(a)
- same-sex, *see* Same-sex marriage

Married status

- tax credit, 118(1)B(a)
- limitation, 118(4)

MasterCard

- prescribed payment card corporation share, Reg. 9002.1(a)(i), (ii)

Master trust (or Pooled fund trust)

- defined, Reg. 4802(1.1)
- excluded from various trust rules, 108(1)“trust”(a)
- exemption from Part I tax, 149(1)(o.4)
- exemption from Part XII.2 tax, 210(2)(c)
- minimum tax not payable by, 127.55(f)(iii)
- rollover to new trust, 248(1)“disposition”(f)(vi)

Matchable expenditure

- deemed to be a tax shelter investment, 18.1(13)
- defined, 18.1(1)
- deduction restricted, 18.1(2)–(4)
- film shelters shut down, 18.1(17)
- non-arm’s length disposition, 18.1(8)–(10)
- reinsurance commissions excluded, 18.1(15)
- rules apply only to tax shelters, 18.1(16)

Matching rule, 18(9), *see also* Matchable expenditure**Material interest**

- defined, 149.2(1)

Material transaction

- defined, for private foundations, 149.1(1), 149.2(2)

Maternity leave

- qualifying period for pension earnings, Reg. 8507(3)

Matrimonial regime, dissolution of, 248(22), (23)**Maturity**

- registered retirement savings plan, of, 146(1)“maturity”

Maximum benefit rule

- for registered pension plan, Reg. 8504

“May”

- meaning of, *Interpretation Act* s. 11

McGillivray Restaurant case overruled, 256(5.11)**Meads v. Meads case**, 2(1) (Notes)**Meals**, *see also* Entertainment expenses (and meals)

- employee’s, deduction limited, 8(4)

Mean Canadian investment fund

- defined, insurers, Reg. 2412

Mean Canadian outstanding premiums

- defined, insurers, Reg. 2400(1)

Mean Canadian reserve liabilities

- defined, insurers, Reg. 2400(1)

Mean maximum tax actuarial reserve

- defined, insurers, Reg. 2400(1)

Mechanic, *see* Apprentice: mechanic**Media**, *see* Journalism**Medical devices and equipment**

- prescribed, 118.2(2)(m), Reg. 5700

Medical doctor, *see also* Physician

- certification for disability credit, 118.3(1)(a.2)
- defined, 118.4(2)
- examination fees to qualify as, tuition credit, 118.5(1)(d)
- fees of, medical expense credit, 118.2(2)(a)
- income of, *see* Professional practice

Medical expenses

- air conditioner, Reg. 5700(c.3)
- alarm for infant, Reg. 5700(r)
- altered auditory feedback device, Reg. 5700(z.1)
- ambulance, 118.2(2)(f)
- animal trained to assist impaired person, 118.2(2)(l)
- artificial eye, 118.2(2)(i)
- attendant care, 64(a)A(ii)(J), 118.2(2)(b), (b.1), (c)
- artificial limb, 118.2(2)(i)
- balance disorder, pressure pulse therapy device for, Reg. 5700(z.4)
- blind aids, *see* Blind person
- bliss symbol board, 64(a)A(ii)(N), Reg. 5700(x)
- blood sugar measuring device, Reg. 5700(s)
- bone marrow transplant, 118.2(2)(l.1)
- braille note-taker, 64(a)A(ii)(O), Reg. 5700(y)
- captioning services, 64(a)A(ii)(A), 118.2(2)(l.4)
- catheters and catheter trays, 118.2(2)(i.1)
- celiac disease patients, gluten-free food costs, 118.2(2)(r)
- closed-caption TV decoder, Reg. 5700(q)
- colostomy pad, 118.2(2)(i)
- cosmetic purposes, expenses disallowed, 118.2(2.1)
- credit for
 - non-refundable, 118.2
 - refundable, 122.51
- crutches, 118.2(2)(i)
- deaf-blind intervening services, 118.2(2)(l.44)
- deduction for, 64
- deemed, 118.2(3)
- deemed payment of, 118.2(4)
- defined, 118.2(2)
- denture costs, 118.2(2)(p)
- devices and equipment, Reg. 5700
- diapers for incontinence, 118.2(2)(i.1)
- driveway alterations, 118.2(2)(l.6)
- drugs, 118.2(2)(n), (s), Reg. 5701
- elastic support hose, Reg. 5700(u)

Index

Medical expenses (*cont'd*)

- electrotherapy device, Reg. 5700(z.2)
- extremity pump, Reg. 5700(u)
- eyeglasses, 118.2(2)(j)
- fertility treatment, 118.2(2)(a), 118.2(2.2)
- full-time attendant for physically or mentally impaired person, 118.2(2)(b), (c)
- gluten-free food costs, 118.2(2)(r)
- group home care, 118.2(2)(b.2)
- guide dog, 118.2(2)(l)
- hardwood flooring disallowed, 118.2(2)(1.2)(i), (ii), 118.2(2)(1.21)(i), (ii)
- Health Canada Special Access Programme, 118.2(2)(s), (t)
- hearing aid, 118.2(2)(i)
- hearing loss, rehabilitative therapy, 118.2(2)(1.3)
- home construction for disabled person, 118.2(2)(1.21)
- home renovations, 118.2(2)(1.2)
 - duplicate claim of home accessibility tax credit permitted, 118.041(4)
- hospital bed, Reg. 5700(h)
- hot tub disallowed, 118.2(2)(1.2)(i), (ii), 118.2(2)(1.21)(i), (ii)
- ileostomy pad, 118.2(2)(i)
- *in vitro* treatment, 118.2(2)(a), 118.2(2.2)
- incontinence-related products, 118.2(2)(i.1)
- inductive coupling osteogenesis stimulator, Reg. 5700(v)
- infusion pump, Reg. 5700(s)
- insulin, 118.2(2)(k)
- iron lung, 118.2(2)(i)
- kidney machine, 118.2(2)(i)
- laboratory procedures, 118.2(2)(o)
- laryngeal speaking aid, 118.2(2)(i)
- learning disability, tutoring, 64(a)A(ii)(H), 118.2(2)(1.91)
- limb brace, 118.2(2)(i)
- lip reading training, 118.2(2)(1.3)
- liver extract, injectible, 118.2(2)(k)
- marijuana, 118.2(2)(u)
- medical equipment and devices, 118.2(2)(i), (k)
 - prescribed, 118.2(2)(m)
- medical practitioners etc., references to, 118.4(2)
- mental or physical impairment, 118.2(2)(b)–(e), 118.3
 - transfer of unused credit to spouse, 118.8
- modifications to dwelling for physically impaired person, 118.2(2)(1.2)
- moving expenses, 118.2(2)(1.5)
- notch provision, 118.2(1)D
- note-taking services, 64(a)A(ii)(F), 118.2(2)(1.41)
- optical scanner, 64(a)A(ii)(D), (Q)
- orthopaedic shoe, etc., Reg. 5700(e)
- oxygen concentrator, 118.2(2)(i)
- oxygen, oxygen tent and oxygen equipment, 118.2(2)(k)
- pacemaker, Reg. 5700(d)
- page turner, Reg. 5700(z), 64(a)A(ii)(P)
- partial dependency, 118.3(3)
- phototherapy equipment, 118.2(2)(i)
- prescribed devices and equipment, 118.2(2)(m), Reg. 5700
- pressure pulse therapy device, Reg. 5700(z.4)
- print reader, 64(a)A(ii)(D), (Q)
- private health services plan premiums, 118.2(2)(q)
 - employee contributions to employee life and health trust, 144.1(10)
- reading services, 118.2(2)(1.43)
- real-time captioning services, 64(a)A(ii)(A), 118.2(2)(1.4)
- refundable credit, additional, 122.51
- rehabilitative therapy for hearing/speech loss, 118.2(2)(1.3)
- reimbursed, 118.2(3)
 - by employer, 118.2(3)(a)
- rocking bed, 118.2(2)(i)
- sign language interpretation services, 64(a)A(ii)(A), 118.2(2)(1.4)

- sign language training, 118.2(2)(1.3)
- Special Access Program devices or drugs, 118.2(2)(s), (t)
- speech loss, rehabilitative therapy, 118.2(2)(1.3)
- speech synthesizer, 64(a)A(ii)(E), Reg. 5700(p)
- spinal brace, 118.2(2)(i)
- standing therapy device, Reg. 5700(z.3)
- syringe, Reg. 5700(b)
- TDD, 64(a)A(ii)(B), Reg. 5700(k)
- talking textbooks, 64(a)A(ii)(I), Reg. 5700(w)
- therapy, 118.2(2)(1.9)
 - for hearing or speech loss, 118.2(2)(1.3)
- training courses to care for infirm dependant, 118.2(2)(1.8)
- transportation services, 118.2(2)(g)
 - where ambulance etc. not available, 118.2(4)
- travelling expenses, 118.2(2)(h)
- truss, hernia, 118.2(2)(i)
- tutoring services, 64(a)A(ii)(H), 118.2(2)(1.91)
- van for use with wheelchair, 118.2(2)(1.7)
- vitamin B12, 118.2(2)(k)
- voice recognition software, 64(a)A(ii)(G), 118.2(2)(1.42)
- walker, 118.2(2)(i), Reg. 5700(i)
- wheelchair, 118.2(2)(i)
- wheelchair lift, Reg. 5700(m)
- wig, Reg. 5700(a)

Medical instruments (small)

- capital cost allowance for, Reg. Sch. II:Cl. 12(e)

Medical practitioner

- defined, 118.4(2)

Medical Research Council

- payments to, as R&D expenditures, 37(1)(a)(ii)(B), 37(7)“approved”
- research grants, taxable, 56(1)(o)

Medicine

- charitable donation from inventory, additional deduction before 2017, 110.1(1)(a.1), (8)

Melford Developments case overruled, Income Tax Conventions Interpretation Act s. 3

Member

- credit union, defined, 137(6)“member”
- deferred profit sharing plan, defined, Reg. 8300(1)
- Parliament
 - allowance non-taxable, 6(1)(b)(i)(A)
 - election contributions
 - credit, 127(3)
 - records of, 230.1
 - income treated as employment income, 248(1)“office”
 - retirement compensation arrangement of, Reg. 6802.1
 - retiring allowances, 60(j.04)
- partnership, *see* Partner
- pension plan, defined, 147.1(1), Reg. 8300(1)
- pooled pension plan, defined, 147.5(1)

Member affiliate

- defined
 - for dividend from non-resident corporation, 90(15)“specified amount”B(b)
 - for FAPI partnership deeming rule, 93.1(4)(a)

Member-funded pension plan, Reg. 8510(9)

Member of Parliament, *see* Member: Parliament

Member of the taxpayer’s household

- defined, Reg. 7304(1)

Membership dues

- employee, deduction, 8(1)(i)(i), (iv)–(vi)
- recreational club etc., not deductible, 18(1)(l)(ii)

Memorial Grant Program for First Responders

- killed in line of duty, tax-free benefit to families, 81(1)(j)

Medical or physical health

- counselling related to

Mental or physical health (*cont'd*)

- value not included in employee's income, 6(1)(a)(iv)
- Mental or physical impairment**, *see also* Blind person; Hearing impairment; Infirm dependant; Mobility impairment
 - attendant care expenses, deduction from income, 64(a)A(ii)(J)
 - residents absent from Canada, 64.1
 - certification by health care professional
 - for disability credit, 118.3(1)(a.2)
 - credit for, 118.3
 - full-time attendant, 118.2(2)(b), (c)
 - partial dependant, 118.3(3)
 - unused, transfer to spouse, 118.8
 - deduction for
 - various medical expenses, 64
 - disability supports deduction, 64
 - home purchase credit, *see* First-Time Home Buyer's Credit and Disability Home Purchase Credit
 - Minister may obtain advice from Dept. of Human Resources Development re, 118.3(4)
 - modifications to dwelling, tax credit for, 118.2(2)(1.2)
 - nature of, 118.4(1)
 - RESP age requirements, waiver, 146.1(2.2)
 - RESP enrolment requirements, part-time allowed, 146.1(2)(g.1)(i)(B)
 - specified disabled person
 - defined, for Home Buyers' Plan, 146.01(1)
 - loan from RRSP to acquire home for, 146.01(1)“supplemental eligible amount”
 - student, 118.6(3)
 - “totally and permanently disabled”
 - meaning of, for pension plans, Reg. 8500(1)

Merchant navy veteran pension, exempt, 81(1)(d)

Merger, *see also* Amalgamation

- absorptive, of foreign corporations, 87(8.2)
- cross-border, 128.2
- deemed receipt of shares on, 87(1.1)
- foreign, *see* Foreign merger
- triangular, 87(9)

Metal fabricator (fitter)

- apprenticeship job creation credit, 127(9)“investment tax credit”

Methods of accounting prohibited, *see* Accounting

Metric scales, capital cost allowance, Reg. Sch. II:Cl. 12(p)

Mexico, *see also* Foreign government

- certain bonds of, *see* Brady bond
- escisión, treatment of shareholder, 15(1.5)
- *Mickleborough* case overruled, 66.1(1)“Canadian exploration expense”(k.2) [repealed]
- stock exchange recognized, 262

Middle East

- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(c)–(f) [repealed]

Migration, *see* Becoming resident in Canada; Ceasing to be resident in Canada

Mileage allowances, Reg. 7306

Millwright

- apprenticeship job creation credit, 127(9)“investment tax credit”

Mine

- buildings, Reg. Sch. II:Cl. 10(g), Sch. II:Cl. 41
- capital cost allowance, Reg. 1100(1)(w)–(ya.2), 1100A
- definitions, Reg. 1104(5)–(8)
- defined, Reg. 1104(6)(b), 1104(7)(a), 1206(1), 3900(1)
- depletion allowance, *see* Depletion allowances
- equipment etc., Reg. Sch. II:Cl. 10(k)–10(m), Sch. II:Cl. 41
- exempt income from, Reg. 1100A [Revoked], Part XIX [Revoked]
- exploration and development expenses, 66

- income from a, meaning of, Reg. 1104(5), (6)(a)
- industrial mineral, Reg. 1100(1)(g), Reg. Sch. V
- separate class, Reg. 1101(4)
- new or expanded
 - separate capital cost allowance classes, Reg. 1101(4a)–(4d)
- property, Reg. Sch. II:Cl. 28, Sch. II:Cl. 41
- shafts etc., Reg. Sch. II:Cl. 12(f)
- townsite costs, *see* Townsite costs

Mineral

- defined, 248(1)
- for capital cost allowances, Reg. 1104(3)

Mineral exploration tax credit, 127(9)“flow-through mining expenditure”

Mineral ore

- defined, Reg. 3900(1)

Mineral resource

- defined, 248(1)

Mineral rights

- dealers in, limitation, 66(5)

Mini-golf relief (COVID), Reg. 8901.1(2)(b)(ix)(A)(V), *see also* Qualifying tourism or hospitality entity

Minimum amount

- defined
 - for minimum tax, 127.51
 - for registered pension plan, Reg. 8506(5), (7)
 - special rule for 2008, Reg. 8506(7)(b)
 - for RRIF, 146.3(1)“minimum amount”, Reg. 7308(3), (4)
 - for RRSP rollover for 2015, 60.022(5)(c), (d)
 - special rule for 2008, 146.3(1.1), (1.2)
 - special rule for 2020, 146.3(1.4), (1.5)
- requirement to withdraw from RRIF annually, 146.3(1)“retirement income fund”

Minimum tax, 127.5–127.55

- additional tax for income not earned in a province, and, 120(4)“tax otherwise payable under this Part”
- additional tax re
 - excluded from instalment estimates for farmers and fishermen, 155(1)(a)
- adjusted taxable income, 127.52
- basic exemption, 127.53
- basic minimum tax credit, 127.531
- carryback re
 - effect on interest payable to taxpayer, 164(5), (5.1)
 - no effect on interest payable, 161(7)
- carryover, 120.2
- additional tax, determination of, 120.2(3)
- where not applicable, 120.2(4)
- excluded from “tax payable” etc. under Part I, 117(1)
- foreign tax credit, 127.54
- partnership investing in residential property or Canadian film, 127.52(2)
- Quebec abatement and, 120(4)“tax otherwise payable under this Part”
- where not applicable, 127.55

Mining

- defined, Reg. 1104(3)
- exemption from non-resident withholding tax on dividends, 213

Mining expenditure

- flow-through, *see* Flow-through mining expenditure

Mining exploration depletion base

- defined, Reg. 1203(2)
- expenses added to
 - amounts receivable, portion included in income, 59(3.3)(f)

Mining exploration expenses, “grass-roots”

- expenses in first 60 days of year, 66.1(8)
- partnership deemed not at arm's length, 66(17)

Mining operations

- defined, for mining tax deduction, Reg. 3900(1)

Mining property, *see also* Canadian resource property

- capital cost allowance, Reg. Sch. II:Cl. 28, Sch. II:Cl. 41
- defined, 35(2)
- excluded from flow-through share renunciation, 66(12.62)(b.1)
- prospector's exemption, 35

Mining reclamation trust [repealed], *see* Qualifying environmental trust**Mining taxes**

- credit, *see* Pre-production mining expenditure
- deduction, 20(1)(v), Reg. 3900

Minister of Canadian Heritage, *see also* Canadian Heritage, Department of

- certification of accredited film/video production, 125.5(1)“accredited film or video production certificate”
- • revocation of certificate, 125.5(6)
- certification of Canadian film/video production, 125.4(1)“Canadian film or video production certificate”
- • revocation of certificate, 125.4(6)

Minister of Finance

- appointed, *Financial Administration Act* s. 14

Minister of National Revenue, *see also* Canada Revenue Agency

- advice from Dept. of Human Resources Development re mental or physical impairment, 118.3(4)
- arbitrary assessment by, 152(7)
- authority re determination of charitable foundation's “prescribed amount”, 149.1(1.2)
- authorized to accept security for payment of tax etc., 220(4)–(4.4)
- burden of proof in assessing penalty, 163(3)
- certificate of exemption, 212(1)(b)(iv), (14)
- certificate re proposed disposition of property by non-resident, 116(2)
- chief source of income, determination re, 31
- consent to change of fiscal period, 249.1(7)
- consent to sale of property bound by Court-registered certificate re amount payable, 223(9), (10)
- defined, 248(1)
- delegation of powers and duties, 220(2.01), Reg. Part IX; *Interpretation Act* s. 24(2)
- determination of amounts under s. 245, 152(1.11), (1.12)
- • binding effect, 152(1.3)
- determination of excessive refund, 160.1(1)
- determination of losses by, 152(1.1), (1.2)
- • binding effect, 152(1.3)
- direction re collection, 225.2
- discretion re transfer pricing adjustments, 247(10)
- duties of
 - • administration and enforcement of Act, 220(1)
 - • disposition of appeal, on, 164(4.1)
 - • refunds, 164(4.1)
 - • when objection filed, 165(3)
- inquiry authorized by, 231.4(1)
- investigatory powers re tax shelters, 237.1(8)
- not bound by return, 152(7)
- notice of, to provide information, 231.2
- permission to destroy records, 230(4), (8)
- powers
 - • acquire and dispose of debtor's tax property, to, 224.2
 - • extension of filing date, 220(3)
 - • seize moneys restorable to tax debtor, to, 224.3
- RPP, authority to impose conditions re, 147.1(5)
- registered investments and, 204.4(2)–(5), 204.5
- required to assess tax, 152(1)
- restrictions on collection, 225.1
- • collection in jeopardy, 225.2
- revocation of registration of charity, 168

- tax shelter identification number, issuance of, 237.1(3)
- waiver of penalty or interest, 220(3.1)
- waiver of requirement to file form or document, 220(2.1)

Minister (of religion), *see* Clergy**Minister of the Environment**

- certification of ecologically sensitive land, *see* Ecological gifts
- permission to dispose of ecologically sensitive land, 207.31

Minor, *see also* Age; Child

- amount payable by trust to, 104(18)
- transfers and loans to, 74.1(2)
 - • corporation, through, 74.5(6)–(11)
 - • deemed, 74.5(6)–(11)
 - • for value, 74.5(1), (2)
 - • joint liability for tax on, 160(1)–(3)
 - • repayment of, 74.1(3)
 - • trust, through, 74.3, 74.5(9), (10)
- trust for, 104(18)

Minor term annuity

- rollover to RRSP, 60.011(2)(b)

Misclassified property, 13(6)**Misrepresentation**

- justification for late reassessment, 152(4)(a)(i), 152(5)
- of other person's tax affairs, penalty, 163.2
- of own tax affairs, penalty, 163(2)

Mission, operational, *see* Deployed operational mission**Mobile crane operator**

- apprenticeship job creation credit, 127(9)“investment tax credit”

Mobility impairment, *see also* Disability; Impairment

- building modifications for, deductible, 20(1)(qq)
- device to permit person with, to drive vehicle
- • medical expense, Reg. 5700(m)
- driveway alterations for person with, 118.2(2)(1.6)
- moving expenses for person with, 118.2(2)(1.5)
- transportation and parking for person with, not taxable benefit, 6(16)

Modifications (to building)

- disability-related, deductible, 20(1)(qq)
- dwelling, for disabled person, medical expense credit, 118.2(2)(1.2)

Modified GAAP, *see* Generally accepted accounting principles**Modified net premium (re insurance policy)**

- defined, Reg. 1408(1), (3)

Mohel

- payment to, medical expense credit, 118.2(2)(a)

Mold, capital cost allowance, Reg. Sch. II:Cl. 12(d)**Moldovan case reinstated**, 31(1)**Mole, capital cost allowance**, Reg. Sch. II:Cl. 1(f), Sch. II:Cl. 3**Monetary contribution**

- for political contribution credit
 - • credit for, 127(3)
 - • defined, 127(4.1), *Canada Elections Act* s. 2(1)

Money

- borrowed, *see* Borrowed money
- business of lending, *see* Moneylender
- included in definition of property, 248(1)“property”

Money market fund

- ineligible for December 15 year-end election, Reg. 4801.01

Money purchase limit

- defined, 147.1(1), 248(1)
- limits pension contributions, 147.1(8), (9)
- limits RRSP contribution, 146(1)“RRSP dollar limit”

Money purchase provision, *see* Registered pension plan: money purchase provision

Money services business

- defined, for electronic funds transfer reporting, 244.1

Moneylender, *see also* Financial institution

- bad debts
- • deduction for, 20(1)(p)(ii)
- • inclusion in income, 12.4
- disposition of Canadian securities, 39(5)(f)
- guarantees etc.
- • acquired from, in amalgamation, 87(2)(h)(iii)
- • reserve for, 20(1)(l.1)
- loan/lending asset
- • acquired from, in amalgamation, 87(2)(h)(ii)
- • reduction in value of
- • • limitation on deduction, 18(1)(s)
- loans etc. acquired in ordinary course of business, 20(27)
- reserve for doubtful debts, 20(1)(l)
- security used or held by
- • “eligible property” for transfer to corporation by shareholder, 85(1.1)(g)
- superficial loss not deductible, 18(13), (15)

Monitor

- crib death, medical expense, Reg. 5700(r)

Monk

- income of, not taxed, 110(2)

Month

- defined, *Interpretation Act* s. 35(1)

Monthly withholding amount

- defined, for new employers remitting quarterly, Reg. 108(1.21)

Montreal

- international banking centre until 2013, 33.1(3)
- stock exchange, designated, 262 (Notes), *see also* Bourse de Montréal Inc.

Morasse case overruled re shareholder benefit, 15(1)(a)**More than five full-time employees**, *see* Six employees test**Morgan Stanley Capital Investment Index units**

- qualified investments for deferred income plans, Reg. 4900(1)(n.1)

Morrissey case overruled, 122.6“shared-custody parent”(b)**Mortality gain**

- defined, Reg. 308(2)

Mortality loss

- defined, Reg. 308(2)

Mortgage, *see also* Debt

- expropriation assets acquired for sale of foreign property, 80.1
- foreclosure, 79
- interest
- • blended with principal in payments, 16(1), 214(2)
- • deduction for, 20(1)(c), *see also* Work space in home
- investment corporation, *see* Mortgage investment corporation
- not a disposition, 248(1)“disposition”(j), (k)
- RRSP investment, Reg. 4900(1)(j)–(j.2)
- sale of, included in proceeds of disposition, 20(5), (5.1)
- subsidy by employer, taxable benefit, 6(23)

Mortgage-backed securities

- eligible for investment by RRSP, etc., Reg. 4900(1)(j)–(j.2)

Mortgage Insurance Corporation of Canada

- payments to guarantee fund deductible, Reg. 1400(3)G

Mortgage investment corporation, 130.1

- deemed public corporation, 130.1(5)
- defined, 130.1(6), 248(1)
- election re capital gains dividend, 130.1(4), Reg. 2104.1
- • where not made, 130.1(4.1)
- non-qualifying taxed capital gains, 130.1(9)
- not subject to mark-to market rules, 142.2(1)“financial institution”(c)(ii)
- qualifying taxed capital gains, 130.1(9)

- shareholders, how counted, 130.1(7)

Mortgage subsidy

- taxable benefit, 6(23)

Motion picture film

- Canadian film or video production credit, 125.4
- capital cost allowance, Reg. Sch. II:Cl. 10(s), Sch. II:Cl. 12(m)
- certified production, *see* Certified production
- film or video production services credit, 125.5
- in-flight movies not treated as entertainment, 67.1(4)(a)
- partnership investing in
- • capital cost allowance limitation, 127.52(2)
- • payment to non-resident for use of, 212(5)
- revenue guarantee, exemption from at-risk rules, 96(2.2)(d)(ii) [repealed]
- shelters prohibited, 18.1(17)

Motor vehicle

- accident claims, payments exempt, 81(1)(q), Reg. 6501
- capital cost allowance
- • of employee, 8(1)(j), Reg. 1100(6)
- • of person carrying on business, 20(1)(a), Reg. 1100(1)(a)(x)
- defined, 248(1)
- device to enable disabled person to drive, Reg. 5700(h)
- employee’s allowance for use of
- • not income, 6(1)(b)(vii.1)
- • where deemed not reasonable, 6(1)(b)(x), (xi)
- employment by U.S. resident on, Canada-U.S. Tax Treaty:Art. XV:3
- expenses
- • limitations on, *see* Passenger vehicle
- • of employee, when deductible, 8(1)(f), (h.1)
- loan to shareholder/employee to purchase, 15(2.4)(d)
- recapture of excess CCA, 13(2)
- terminal loss rules not applicable, 20(16.1)

Motor vehicle body repairer (metal and paint)

- apprenticeship job creation credit, 127(9)“investment tax credit”

Motor vehicle warranty, *see* Extended motor vehicle warranty**Motorcycle mechanic**

- apprenticeship job creation credit, 127(9)“investment tax credit”

Moufarrège case overruled, 20.1**Mould**

- capital cost allowance, Reg. Sch. II:Cl. 12(d)

Movable property

- defined
- • *Quebec Civil Code*, art. 900–907

Movie, *see* Motion picture film**Movie theatres relief (COVID)**, Reg. 8901.1(2)(b)(xiv), *see also* Qualifying tourism or hospitality entity**Moving expenses**, *see also* Relocation

- certain students, 62(2)
- deduction for, 62(1)
- • residents absent from Canada, 64.1
- defined, 62(3)
- medical expense credit, 118.2(2)(1.5)
- moving to United States, Canada-U.S. Tax Treaty:Art. XIII:6
- “new work location”, 62(1)
- residents absent from Canada
- • deduction, 64.1

Multi-employer plan (RPP)

- anti-avoidance, 147.1(14)
- defined, 147.1(1), Reg. 8500(1)
- pension adjustment limits, 147.1(9)
- registration requirements, Reg. 8510(7)
- special rules, Reg. 8510(5)
- when revocable, 147.1(9)

Multilateral Instrument, *see before* Canada-US Tax Treaty

Multinational enterprise group

- defined, for country-by-country reporting, 233.8(1)

Multi-tier alignment

- defined (for corporate inclusion of partnership income), 34.2(1)
- election, 249.1(9)
- no stub-period accrual for earlier years, 34.2(9)

Multi-tier alignment election

- for partnership, 249.1(9)

Multiple counting of deductions or credits, 248(28)**Multiple mine property**

- capital cost allowance, Reg. 1100(1)(ya.2)
- separate prescribed class, Reg. 1101(4h)

Multiple-unit residential buildings

- capital cost allowance, Reg. Sch. II
- separate classes, Reg. 1101(5b)

Municipal body performing function of government, *see*

Public body: performing function of government

Municipal waste

- defined, Reg. 1104(13)
- included in eligible waste fuel, Reg. 1104(13)“eligible waste fuel”
- used as fuel, Reg. Sch. II:Cl. 43(e)(i)(A), Sch. II:Cl. 43.1(d)(ix)

Municipality, *see also* Government

- assistance by, *see* Assistance/government assistance
- bonds of
 - constitute qualified securities for securities lending arrangement rules, 260(1)“qualified security”(c)
 - no non-resident withholding tax, 212(1)(b)(ii)(C)(III)
- corporation controlled by, excluded from refundable ITC, 127.1(2)“excluded corporation”(a)(ii)
- corporation owned by
 - bonds of, no non-resident withholding tax, 212(1)(b)(ii)(C)(IV)
 - deemed not private corporation for Part IV tax, 227(16)
 - election to remain taxable, 149(1.11)
 - exempt from tax, 149(1)(d.5)
- donation to, 149.1(1)“qualified donee”(a)(ii)
 - by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
- elected officer or school board trustee, expense allowance exempt, 81(3) [before 2019]
- exempt from tax, 149(1)(c)
- gifts to, *see* donation to (above)
- officials, bribery of, no deduction, 67.5
- property taxes
 - farmland
 - addition to adjusted cost base, 53(1)(i)(iii)(A)
 - deduction by partner where partnership disposes of land, 101(c)(i)
 - limitation on deduction, 18(2)(b)
- representation to, expenses deductible, 20(1)(cc)
- support payments for farmers by, information slips, Reg. 234–236
- townsite costs, *see* Townsite costs
- volunteer emergency worker
 - exemption for, 81(4)
- welfare, *see* Social assistance payment

Museums relief (COVID), Reg. 8901.1(2)(b)(v), *see also*

Qualifying tourism or hospitality entity

Musical instrument

- capital cost allowance, Reg. Sch. II:Cl. 8(i)
- costs, to employee, 8(1)(p)

Musical work, copyright royalties

- no withholding tax, 212(1)(d)(vi), 212(9)(b)

Musician

- deduction from employment income, 8(1)(p), (q)
- U.S. resident, Canada-U.S. Tax Treaty:Art. XVI

Mute person

- speech synthesizer
 - disability supports deduction, 64(a)A(ii)(E)
 - medical expense credit, Reg. 5700(p)

Mutual agreement procedure, Canada-U.S. Tax Treaty:Art. XXVI**Mutual corporation**

- provincial life insurance corporation converted into, 139

Mutual fund, *see also* Mutual fund corporation; Mutual fund trust

- defined, for non-resident trust rules, 94(1)

Mutual fund corporation, 131

- amalgamation, 87(2)(bb)
- capital gains dividends, election, 131(1)–(1.4), Reg. 2104
- interest on, 131(3.1), (3.2)
- capital gains on Canadian securities, 39(5)
- capital gains redemptions, defined, 131(6)
- deemed private corporation, 131(5)
- defined, 131(8), (8.1), 248(1)
- distributions to non-residents, tax on, 218.3
- dividend refund to, 131(5)
- election not to be restricted financial institution, 131(10)
- increase in paid-up capital not deemed dividend, 131(4)
- information return where share claimed to be qualified investment, Reg. 221
- non-residents, distributions to, tax on, 218.3
- non-residents, for benefit of, 131(8.1)
- not subject to mark-to-market rules, 142.2(1)“financial institution”(c)(iii)
- payment of tax, 157(3)
- qualified investment for RRSP, RRIF, etc.
 - bond or debenture of trust, Reg. 4900(1)(c.1)
 - unit of trust, Reg. 4900(1)(c)
- refund to, re capital gains dividend, 131(2), (3)
- refundable capital gains tax on hand, 131(6)
 - reduction of, 131(9)
- rollover of property to mutual fund trust, 132.2
- shares of
 - transferred in exchange for units of mutual fund trust, 132.2(3)(l)
- switch fund
 - conversion to mutual fund trusts tax-free, 132.2(1)“qualifying exchange”
 - no rollover of shares allowed, 131(4.1)
- taxable Canadian property, gains distributed to non-residents, 131(5.1), (5.2)
- taxed capital gains, 131(7)
- transitional election to be MFC for 2016–17, 131(8.01)

Mutual fund limited partnership

- financing, restrictions on, 18.1

Mutual fund trust, 132

- allocation to redeemers, 132(5.3)
- amounts designated by, 132.1
 - adjusted cost base of unit, 132.1(2)
 - deduction for, 132.1(1)(c)
 - carryover, 132.1(4)
 - limitation, 132.1(3)
 - inclusion in taxpayer’s income, 132.1(1)(d)
 - where designation of no effect, 132.1(5)
- capital gains on Canadian securities, 39(5)
- capital gains redemptions, defined, 132(4)
- capital gains refund to, 132(1), (2)
 - interest on, 132(2.1), (2.2)
- defined, 132(6)–(7), 248(1)
 - election to be from beginning of first taxation year, 132(6.1)
 - following rollover of assets in qualifying exchange, 132.2(3)(k)
 - retention of status to end of calendar year, 132(6.2)
- distributions to non-residents, tax on, 218.3

Index

Mutual fund trust (*cont'd*)

- election for December 15 year-end, 132.11
- • allocation or designation of amount to be included in income, 132.11(6)
- • • late filing of allocation or designation, 220(3.21)(b)
- exemption from Part XII.2 tax, 210(2)(c)
- information return, Reg. 204, 204.1
- • that trust is qualified investment, Reg. 221
- instalment payments of tax, 156(2)
- interest received by, on behalf of non-residents, exemption, 212(9)(c)
- minimum tax not payable by, 127.55(f)(ii)
- non-residents, distributions to, tax on, 218.3
- non-residents, for benefit of, 132(7)
- not subject to mark-to market rules, 142.2(1)“financial institution”(d)
- obligation guaranteed by, qualified investment for deferred income plan, Reg. 4900(1)(i)
- qualified investment for RRSP, RRIF, etc.
- • bond or debenture of trust, Reg. 4900(1)(d.1)
- • unit of trust, Reg. 4900(1)(d)
- real estate investment trust as, 132(6)(b)(ii)
- redemptions, allocation to redeemers, 132(5.3)
- refundable capital gains tax on hand
- • defined, 132(4)
- rollover of property to another mutual fund trust, 132.2
- SIFT conversion to corporation
- • exchange of employee stock options, 7(1.4)(b)(vi)
- taxable Canadian property, gains distributed to non-residents, 132(5.1), (5.2)
- taxable capital gains
- taxation year, election for December 15, 132.11
- taxed capital gains, 132(5)
- transfer of property from mutual fund corporation or trust, 132.2
- unit of
- • adjusted cost base of, 53(1)(d.2)
- • “Canadian security”, 39(6)
- • deemed to be a share for rollover purposes, 132.2(1)“share”
- • employee option to acquire, 7(1), 110(1)(d)
- • transferred in course of qualifying exchange, 132.2(3)(a.1), (f)
- year-end, election for December 15, 132.11

Mutual holding corporation

- deemed dividend on distribution by, 139.2
- defined, for insurance demutualization, 139.1(1)

Mutual insurance corporations

- exemption for, 149(1)(m)

Mutual life insurance corporation

- provincial corporation converted into, 139

Mutualization proposal (for insurer), 139

N

NDDA, *see* Non-deductible distributions amount

NERDTH, *see* Non-eligible refundable dividend tax on hand

NFE

- defined, for Common Reporting Standard, 270(1)“non-financial entity”

NFFE

- defined, for certain purposes (re FATCA), 265(4)(b)

NISA, *see* Net income stabilization account

NISA Fund No. 2, *see also* Net income stabilization account

- amount credited to, not taxed, 12(10.3)
- deemed paid on acquisition of control of corporation, 12(10.4)
- deemed paid on death, 70(5.4)
- defined, 248(1)
- disposition of, 73(5)
- paid to non-resident, withholding tax, 212(1)(t), 214(3)(l)

- • information return required, Reg. 202(2.1)
- receipt from, included in income, 12(10.2)
- • constitutes active business income, 125(7)“income of the corporation for the year from an active business”
- • information return required, Reg. 201(1)(e)
- right to benefit, no tax on emigration, 128.1(10)“excluded right or interest”(i)
- rollover to corporation, 85(1)(c.1), 85(1.1)(i)
- transfer to spouse or spouse trust, 70(6.1), 73(5)(a), 104(5.1), (14.1)

NPP, *see* Non-portfolio properties

NQS, *see* Non-qualifying security

NR4 returns, Reg. 202

NR4 slips, Reg. 202

NRO, *see* Non-resident-owned investment corporation (before 2004)

NRT, *see* Trust (or estate): non-resident

NSERC, *see* Natural Sciences and Engineering Research Council

NSF cheque, *see* Cheque: dishonoured

NSULC, *see* Nova Scotia: unlimited liability company

NWA, *see* Net worth assessment

Nanini case overruled, 160(1)(e)(ii)

Narrow participation retirement fund

- defined, for Common Reporting Standard, 270(1)

Nasdaq over-the-counter stocks

- qualified for deferred income plans before 2002, Reg. 4900(1)(s) [repealed]

National

- defined, Canada-U.S. Tax Treaty:Art. III:1(k)

National arts service organization, *see* Registered national arts service organization

National Child Benefit supplement, 122.61(1)C

National Defence, *see* Canadian Forces and veterans

National Film Board

- prescribed person for Canadian film/video tax credit, Reg. 1106(10)

National Life case overruled, 138(26), Reg. 1406(b)

National Revenue, Department of, *see* Minister (of National Revenue); Canada Revenue Agency

Natural gas, *see* Petroleum/natural gas

Natural person

- defined, for Common Reporting Standard, 270(1)
- tax-protestor arguments, 248(1)“person” (Notes)

Natural Sciences and Engineering Research Council

- payments to, as R&D expenditures, 37(1)(a)(ii), 37(7)“approved”
- research grants, taxable, 56(1)(o)

Nature Conservancy

- prescribed donee, Reg. 3504

Nature parks relief (COVID), Reg. 8901.1(2)(b)(v), *see also* Qualifying tourism or hospitality entity

Nav Canada

- debt of, qualified investment for deferred income plans, Reg. 4900(1)(q)

Nazi Germany

- compensation to victims of, 81(1)(g)

Needle/syringe

- medical expense, Reg. 5700(b)

Negative amounts

- adjusted cost base, deemed gain, 40(3), (3.1)
- capital cost allowance pool, recapture, 13(1)
- in formulas, deemed nil, 257
- investment tax credit balance, recapture, 127(27)–(36)
- taxable income cannot be less than nil, 248(1)“taxable income”
- undepreciated capital cost, recapture, 13(1)

Negative policy reserves

- of insurer, 12(1)(e.1), 20(22), Reg. 1400(2)

Neglect

- grounds for reassessment at any time, 152(4)(a)(i)

Negligence, *see* Gross negligence; Neglect

Nephew, *see* Niece/nephew

Net asset value

- defined, for mutual fund rules re allocation to redeemers, 132(4)

Net capital loss

- amalgamation, on, 87(2.1)
- carryover of, 111(1)(b)
- • limitation, 111(1.1)
- death, on, 111(2)
- defined, 111(8), (9), 248(1)
- determination of, by Minister, 152(1.1), (1.2), (1.3)
- limitation on deductibility, 111(3)
- non-deductible where control of corporation changed, 111(4)
- partnership, from, 96(1)
- reassessment, 152(6)(c)
- reduction of, on debt forgiveness, 80(4)(b)
- subsidiary's, on winding-up, 88(1.2)

Net corporate income tax rate

- defined, 248(1)

Net cost (of labour-sponsored funds share)

- defined, 127.4(1), 211.7(1)

Net cost of pure insurance

- defined, Reg. 308
- premium deductible where used as collateral, 20(1)(e.2)

Net decrease in the excess corporate holdings percentage

- for private foundation rules
- • allocation of, 149.2(7)
- • defined, 149.2(4)

Net distribution amount

- defined, for foreign affiliate liquidation and dissolution, 88(3.2)

Net earnings (of foreign affiliate)

- defined, Reg. 5907(1)
- exempt due to tax sparing, Reg. 5907(10)
- included in exempt earnings, Reg. 5907(1)“exempt earnings”(d)(i)
- included in taxable earnings, Reg. 5907(1)“taxable earnings”(b)

Net family income, *see* Adjusted income

Net forgiveness amount

- reserve for, 61.3(1)(a), 61.3(2)(a)

Net income (on income tax return)

- defined, 3

Net income stabilization account, *see also* NISA Fund No. 2

- administration fee, deductible, 20(1)(ff)
- death of taxpayer, on, 70(5.4), 70(6.1)
- defined, 248(1)
- fair market value of, for certain capital gains exemption rules, 110.6(1.1)
- money borrowed to contribute to, no deduction for interest, 18(11)(f)
- no accrual of interest income, 12(3), 12(11)“investment contract”(j)
- transfer to spouse or spouse trust, 70(6.1)

Net increase in the excess corporate holdings percentage

- for private foundation rules
- • allocation of, 149.2(5)
- • defined, 149.2(3)

Net interest rate

- defined, 211(1)

Net loss (of foreign affiliate)

- defined, Reg. 5907(1)

Net past service pension adjustment (net PSPA)

- defined, 146(1), 204.2(1.3)

Net premium for the policy

- defined, re policy reserves, Reg. 1408(1)

Net premium reserve

- re life insurance policy, defined, Reg. 1401(3)

Net resource adjustment

- defined, Reg. 5203(3.1)
- reduces adjusted business income for M&P credit, Reg. 5203(1)“adjusted business income”(b)

Net resource income

- defined, Reg. 5203(3)

Net surplus (of foreign affiliate)

- defined, Reg. 5907(1)

Net taxable capital gains

- defined, 104(21.3)

Net tax owing

- defined (for instalments), 156.1(1)

Net worth assessment, 152(7)

Netherlands, *see also* Foreign government

- stock exchange recognized, 262
- universities, gifts to, Reg. Sch. VIII, s. 20

Network equipment, *see* Data network infrastructure equipment

Neuman case overruled, 120.4

New account

- defined, for Common Reporting Standard, 270(1)

New Brunswick, *see also* Province

- Community Development bonds, eligible for RRSP investment, Reg. 4900(1)(i.1)
- tax rates, *see* introductory pages

New corporation, *see* Amalgamation; Corporation

New employer

- defined, for quarterly remittances, Reg. 108(1.4)

New entity account

- defined, for Common Reporting Standard, 270(1)

New gain

- defined, for foreign currency debt after change of control, 40(10), (11)

New individual account

- defined, for Common Reporting Standard, 270(1)

New law (post-1971)

- defined, ITAR 12
- references to, ITAR 13, 16

New loss

- defined, for foreign currency debt after change of control, 40(10), (11)

New share

- defined, Reg. 6202.1(5)

New Zealand, *see also* Foreign government

- currency loan, *see* Weak currency debt
- stock exchange recognized, 262
- universities, gifts to, Reg. Sch. VIII, s. 22

Newfoundland and Labrador, *see also* Province

- Canada–Newfoundland Atlantic Accord, communication of information for, 241(4)(d)(vi)
- cod fishermen compensation, *see* Northern Cod Compensation and Adjustment Program
- corporation incorporated in, before 1949
- • deemed incorporated in Canada, 248(1)“corporation incorporated in Canada”
- labour-sponsored venture capital corporation of
- • prescribed, Reg. 6700(a)(iii), (xii)
- offshore area
- defined, 248(1)
- included in “province”, 124(4)

Newfoundland and Labrador (*cont'd*)

- prescribed area, for electrical energy or steam processing, 127(9)“qualified property”(c.1)
- prescribed designated region, 127(9)“specified percentage”(a)(vi), Reg. 4607
- prescribed stock savings plan, Reg. 6705(d)
- qualified property acquired for use in, 127(9)“specified percentage”(a), (e)
- tax rates, *see* introductory pages

News online subscription credit, 118.02**News show**

- ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(i)
- ineligible for film/video production services credit, Reg. 9300(2)(a)

Newspaper, *see* Journalism**Newspaper advertising, limitation**, 19**Niece/nephew**

- defined, 252(2)(g)
- dependent, 118(6)(b)
- property transferred to, income attribution re, 74.1(2)

Nil, minimum amount for formula calculations, 257**Nil income**

- equivalent to zero income, 3(f)

Nightclubs relief (COVID), Reg. 8901.1(2)(b)(ii), *see also* Qualifying tourism or hospitality entity**Nobel Prize, non-taxable**, Reg. 7700**Nominee**, *see also* Bare trust

- defined, 127(3), *Senate Appointment Consultations Act*, s. 2(1)

Non-arm's length creditor

- defined, 212(21)(a)

Non-arm's length indicator

- application to foreign trust, 233.2(2)

Non-arm's length person

- defined, for synthetic equity arrangements, 248(1)“synthetic equity arrangement”(a)(i)
- excessive payment where property surrendered to creditor, 79(3)E(a)
- interest on debt relating to acquisition of land, 18(3)“interest on debt relating to the acquisition of land”(b)
- loans to, 56(4.1)–(4.3)
- meaning of, *see* Arm's length: meaning of
- non-resident, transactions with
 - extended reassessment period, 152(4)(b)(iii)
 - information return, 233.1
- soft costs relating to construction, 18(3.1)(b), 18(3.2)(b)
- transfer of property to or from, 69(1)

Non-arm's length transactions

- agreement to pay low rent for property
- effect on disposition of property, 69(1.2)
- amalgamated corporations, 251(3.1)
- corporation having, with non-resident persons
 - extended reassessment period, 152(4)(b)(iii)
 - information return, 233.1
- depreciable property acquired through, 13(7)(e)
 - corporations controlled by one trustee, 13(7.3)
- disposition at less than fair market value, 69(1)(b)
- inadequate considerations, 69
- income or gain from property transferred
 - transferor and transferee liable for tax, 160
- lease of depreciable property, 13(32)
- life insurance policy, disposition, 148(7), (8)
- non-resident, unreasonable consideration paid to, 247
- presumption, 251(1)(a)
- property disposed of in, ITAR 26(5)
- purchases at more than fair market value, 69(1)(a)
- rights or things transferred to beneficiary

- deemed cost, 69(1.1)
- sale of shares, 84.1
- non-resident, by, 212.1
- share for share exchange, 85.1(2)(a)
- transfer of property by tax debtor, 160
- transfer of right to income, 56(4)
- unpaid amounts, 78(1), (2)

Non-business income tax (foreign)

- deduction for, 126(1)
- defined, 126(7)
- for trust, 104(22.4)

Non-cancellable or guaranteed renewable accident and sickness policy

- defined, Reg. 1408(1)

Non-capital loss

- amalgamation, on, 87(2.1), (2.11)
- carryover of, 111(1)(a)
- corporation, by, 111(5)–(5.4)
- winding-up of subsidiary, on, 111(5.4)
- defined, 111(8), (9), 248(1)
- determination of, by Minister, 152(1.1), (1.2), (1.3)
- employee life and health trust's, 111(7.3)–(7.5), 144.1(13)
- limitation on deductibility, 111(3)
- partnership, from, 96(1)
- reassessment, 152(6)(c)
- reduction of, on debt forgiveness, 80(3)(a), 80(4)(a)
- subsidiary's, on winding-up, 88(1.1)

Non-CCPC

- defined, 89(1)“low rate income pool”
- predecessor, 89(5)(b)

Non-competition agreement, *see* Restrictive covenant (or non-competition payment)**Non-compliant registered disability savings plan**

- effect of, 146.4(10)
- meaning of, 146.4(11), (12)

Non-conventional lands, defined, Reg. 1206(1)**Non-Crown royalty**

- defined, for mining tax deduction, Reg. 3900(1)

Non-deductible distributions amount

- defined, 104(16), 122(3)

Non-discretionary trust

- defined, 17(15)

Non-discrimination, Canada-U.S. Tax Treaty:Art. XXV**Non-eligible refundable dividend tax on hand**

- defined, 129(4)
- transitional determination for 2019, 129(5)
 - on amalgamation, 129(5.1)
- refund of, 129(1)(a)(ii)(A)(II)

Non-financial entity

- defined, for Common Reporting Standard, 270(1)

Non-participating life insurance policy

- defined, 211(1)

Non-periodic payments

- tax deduction, Reg. 103

Non-portfolio earnings

- defined, for SIFT partnership distributions, 197(1)
- defined, for SIFT trust distributions, 122.1(1)

Non-portfolio properties

- defined, for SIFT trust and partnership distributions, 122.1(1), 248(1)

Non-profit association, *see* Non-profit organization**Non-profit corporation**, *see also* Non-profit organization

- qualified investment for RRSP etc., Reg. 4900(1)(r)
- scientific research and experimental development, for
 - annual return, 149(7)
 - exemption, 149(1)(j)

Non-profit corporation (*cont'd*)

- • payments to, 37(1)(a)(iii)

Non-profit organization, *see also* Charity; Non-profit corporation

- exemption for, 149(1)(l), 149(2)
- • deemed a trust, 149(5)
- foreign, defined, Reg. 6804(1)
- information return, whether required, 149(5), 149(12), 150(1)(a)

Non-qualified investment, *see also* Qualified investment

- charitable foundation
 - • defined, Reg. 3700
- deferred profit sharing plan
 - • acquisition of, tax on, 198(1)
 - • defined, 204“qualified investment”
 - • disposition of, refund of tax, 198(4)
 - • initial, 199, 204“initial non-qualified investment”
 - • tax on, 207.1(2)
- private foundation
 - • acquisition of, tax on, 189(1)
 - • defined, 149.1(1)“non-qualified investment”
- proportional holdings election, 259(1), (3)
- registered disability savings plan (RDSP)
 - • acquisition of, tax on, 207.04(1)
 - • defined, 146.4(1)“qualified investment”, 207.01(1)
 - • investment becoming or ceasing to be, 207.01(6)
 - • obligation of promoter, 207.01(5)
 - • tax on acquisition of, 207.04(1)
- registered education savings plan (RESP)
 - • acquisition of, tax on, 207.04(1)
 - • defined, 146.1(1)“qualified investment”, 207.01(1)
 - • investment becoming or ceasing to be, 207.01(6)
 - • obligation of promoter, 207.01(5)
 - • revocation of plan, 146.1(2.1), (12.1)
 - • tax on acquisition of, 207.04(1)
- registered retirement income fund (RRIF)
 - • defined, 146.3(1)“qualified investment”, 207.01(1)
 - • disposition of, 146.3(8)
 - • holding of, tax on, 207.04(1)
 - • • waiver of tax, 207.06(2)
 - • information return, Reg. 215(3)
 - • investment becoming or ceasing to be, 207.01(6)
 - • obligation of issuer, 207.01(5)
- registered retirement savings plan (RRSP)
 - • acquisition of, 146(10)
 - • defined, 146(1)“non-qualified investment”, “qualified investment”, 207.01(1)
 - • disposition of, 146(6)
 - • • waiver of tax, 207.06(2)
 - • information return, Reg. 214(2)
 - • investment becoming or ceasing to be, 207.01(6)
 - • obligation of issuer, 207.01(5)
- tax-free savings account (TFSA)
 - • defined, 207.01(1)
 - • holding of, tax on, 207.04(1)
 - • • waiver of tax, 207.06(2)
 - • investment becoming or ceasing to be, 207.01(6)
 - • obligation of issuer, 207.01(5)

Non-qualified security

- deduction to employer, 110(1)(e)
- defined, for stock option rules, 110(1.31), (1.4), (1.41)
- excluded from deduction to employee, 110(1)(d)
- notification to employee and CRA, 110(1.9)

Non-qualifying business

- defined, for FAPI rules, 95(1)

Non-qualifying corporation (for small business investment tax credit)

- defined, 127(9)

Non-qualifying country

- defined, for FAPI rules, 95(1)

Non-qualifying real property

- defined, 108(1), 110.6(1), 131(6) [all repealed]

Non-qualifying security

- calculation of capital gain on, 40(1.01)
- ceasing to be, 118.1(13)(b)
- defined, 118.1(18)
 - • donation of
 - • • credit disallowed to individual, 118.1(13)–(13.3)
 - • • death of donor, 118.1(15)
 - • • deduction disallowed to corporation, 110.1(6)
 - • • • amalgamation, effect on donor, 87(2)(m.1)
 - • • windup, effect of, 88(1)(e.2), (e.61)
 - • exchanged for another non-qualifying security, 118.1(14)
 - • reserve on donation of, 40(1.01)(c)
 - • • disallowed in year of death, 72(1)(c)

Non-refundable credits, 118–118.95**Non-reporting Canadian financial institution**

- defined
 - • FATCA agreement for exchange of information with IRS Agreement, Art. 1:1(q)
 - • for Canadian reporting of U.S. persons’ interests in accounts, 263(1)

Non-reporting financial institution

- defined, for Common Reporting Standard, 270(1)

Non-resident, *see also* Non-resident tax; Becoming resident in Canada; Ceasing to be resident in Canada; Former resident

- actor, *see* Actor: non-resident
- agent for, liable to withhold tax, 215(3)
- alimony/maintenance paid to, 212(1)(f) [repealed]
- allowance for investment in property in Canada, Reg. 808
- alternative re rents and timber royalties, 216
- amount owing to corporation resident in Canada, 17(1)
- amount paid to, re pre-1976 bond, etc.
 - • prescribed countries, Reg. 1600
- amounts received under certain contracts, 115(2)(c.1), 115(2)(e)(v)
 - • withholding tax, 153(1)(o)
- annuity payments to, 212(1)(o)
- assessment under Part XIII, 227(10)
- assuming debt for Canadian business, 76.1(2)
- bank accounts, reporting of to foreign governments, *see* Common Reporting Standard
- becoming, *see* Ceasing to be resident in Canada
- beneficiary, *see* Beneficiary: non-resident
- benefit conferred on, 246(1)(b)
- benefits paid to, 212(1)(j)
- branch tax, 219
- Canadian resource property, income earned on, 115(4)
- capital cost allowance, Reg. 1102(3)
- capital dividend paid to, 212(1)(c)(ii), 212(2)(b)
- capital gains of, taxed, 115(1)(b)
 - • proration re gains before May 1995, 40(9)
- capital property, change in use, 45(1)(d)
- carrying on business in Canada
 - • extended meaning of, 253
 - • liability for income tax, 2(3)(b)
- ceasing to be, *see* Becoming resident in Canada
- change in use (or proportions of use) of capital property, 45(1)(d)
 - • change in use (or proportions of use) of depreciable property
 - • • “gaining or producing income” from a business, 13(9)
 - • corporation, *see also* Foreign affiliate
 - • • bonds of, eligible for RRSP investment, Reg. 4900(1)(p)

Index

- Non-resident (*cont'd*)
- branch tax, 219(1)
 - debt forgiveness reserve, 61.3(2)
 - deemed, where not resident due to treaty, 250(5)
 - dividend received by Canadian corporation from, 112(2)
 - electronic filing not required, Reg. 205.1(2)(b)
 - income bond/debenture, interest on, 15(4)
 - no share capital, equity interests deemed to be shares, 93.2(2)
 - required to file tax return, 150(1)(a)
 - shares of, for deferred income plans, 204“qualified investment”(h)
 - RESP qualified investment, 146.1(1)“qualified investment”(a)
 - RRSIF qualified investment, 146.3(1)“qualified investment”(a)
 - RRSP qualified investment, 146(1)“qualified investment”(a)
 - credit for tax paid on emigration, 119
 - debt owing to corporation resident in Canada, 17
 - deductions allowed, in computing income from a source, 4(3)
 - deferred profit sharing plan payments to, 212(1)(m)
 - defined, 248(1)
 - disposition of property by
 - Canadian resource property, certificate re, 116(5.2)
 - Canadian securities, 39(5)(g)
 - interest in real property etc., 216(5)
 - life insurance policy, presumption re, 116(5.4)
 - taxable Canadian property, *see* taxable Canadian property (*below*)
 - treaty-protected property, 116(5.01), (5.02)
 - where tax deferred under tax treaty, 115.1
 - dividend paid to, 212(2)
 - stop-loss rule, 40(3.7)
 - election to file return under Part I
 - certain payments, 217
 - rents and timber royalties, 216
 - restriction on deduction, 216(8)
 - emigration, *see* Ceasing to be resident in Canada
 - employed in Canada
 - liability for income tax, 2(3)(a)
 - energy conversion grants paid to, 212(1)(s)
 - entity, *see* Non-resident entity
 - estate or trust income paid to, 212(11)
 - exchanged for another non-qualifying security, 118.1(14)
 - exchanges of property, determination of gain, 44(7)
 - excluded property, defined, 116(6)
 - financial institution, *see also* Authorized foreign bank
 - beginning to use property in Canadian business, 142.6(1.2)
 - ceasing to use property in Canadian business, 142.6(1.1)
 - foreign tax credit re disposition before Oct/96, 126(2.2)
 - former resident, credit for tax paid on emigration, 119
 - home insulation grants paid to, 212(1)(s)
 - income-averaging annuity contract payments to, 212(1)(n)
 - income earned in a province, Reg. 2602
 - “income for the year”, 120(3)
 - income from ship or aircraft, exempt, 81(1)(c)
 - individual
 - computation of Part I tax, 118.94
 - required to file tax return, 150(1.1)(b)
 - tax credits, 118.94
 - insurance corporation, *see* Insurance corporation: non-resident
 - insurer, liability for additional tax on branch profits, 219(4)–(8)
 - inventory of, 10(12)–(14)
 - investor, *see* Non-resident investor
 - issuing obligation at discount, 16(2), (3)
 - loan to, by corporation, 17
 - management fees paid to, 212(1)(a)
 - moving debt from Canadian business, 76.1(1)
 - no reserve for amount not due until later year, 20(8)
 - non-arm’s length sale of shares by, 212.1
 - obligation transferred or assigned to
 - where deemed resident, 214(9)
 - ownership certificate required of, 234
 - partnership, withholding tax on payments to, 212(13.1)(b)
 - patronage dividends paid to, 212(1)(g)
 - payments to, 212(1)
 - deemed, 214(3), (3.1)
 - information returns, Reg. 202
 - pension benefits paid to, 212(1)(h)
 - pension fund, *see* Non-resident pension fund
 - persons, Reg. 805
 - excluded property, Reg. 810
 - plan for benefit of, re services rendered outside Canada, excluded from “retirement compensation arrangement”, 248(1)
 - exception re “resident’s arrangement”, 207.6(5)
 - real estate of, transfer to corporation, 85(1.1)(h), 85(1.2)
 - refund of Part XIII tax, 227(6)
 - registered education savings plan payments to, 212(1)(r)
 - registered retirement income fund payments to, 212(1)(q)
 - registered retirement savings plan payments to, 212(1)(l)
 - remuneration for office, employment or services, 115(2)(c.1), 115(2)(e)(v)
 - withholding tax, 153(1)(o)
 - rents/royalties paid to, 212(1)(d)
 - reporting accounts to CRA to pass on to foreign governments, *see* Common Reporting Standard
 - retirement compensation arrangement, purchase price of interest in, 212(1)(j)
 - retiring allowance paid to, 212(1)(j.1)
 - return may be required of, 215(4)
 - salary deferral arrangements, 6(13)
 - shareholder
 - loan to, from corporation, 15(2.2), (8), 227(6.1)
 - spousal support payments, 212(1)(f)
 - stop-loss credit, 119
 - student, 115(2)
 - supplementary unemployment plan benefits paid to, 212(1)(k)
 - TFSA taxable payments to, 212(1)(p)
 - tax, *see also* Non-resident tax
 - tax under Part I, 2(3)
 - taxable Canadian property
 - disposition of, 2(3)(c), 115(1)(b), 116
 - failure to give Minister notice, offence/penalty, 238(1)
 - prorating for gains before May 1995, 40(9)
 - purchaser liable for tax, 116(5)
 - taxable income earned in Canada, 115
 - deductions permitted, 115(1)(d)–(f)
 - taxable income of corporation earned in a province, Reg. 413
 - taxation year of, 250.1(a)
 - time, *see* Non-resident time
 - timber royalties paid to, 212(1)(e)
 - transactions not at arm’s length with, 247
 - extended reassessment period, 152(4)(b)(iii)
 - information return re, 233.1
 - penalty for failure to file, 162(10)
 - transfer pricing rules, *see* Transfer pricing (re non-residents)
 - treaty-exempt property, 116(6.1)
 - trust, *see* Trust (or estate): non-resident
 - unreasonable consideration from, 247
 - unreasonable consideration paid to, 247
 - withholding tax, 212, 215(1), 227(10), Reg. 105, *see also* Non-resident tax
 - joint and several liability, 227(8.1)
- Non-resident entity**
- defined, 94.1(2)
 - interest in, structured for tax deferral, 94.1(1)

Non-resident entity (*cont'd*)

- reporting of property held by, 233.2(4.1)

Non-resident financial institution, *see* Non-resident: financial institution**Non-resident investor**

- defined, 218.3(1)

Non-resident-owned investment corporation (before 2004), 133

- eliminated after 2003, 133(8)“non-resident-owned investment corporation”(g)–(i)

Non-resident pension fund

- deemed not carrying on business in Canada, 115.2(2)
- defined, re not carrying on business in Canada, 115.2(1)

Non-resident portion (of trust)

- defined, 94(1)
- excluded from deemed-resident trust's income, 94(3)(f)(i)

Non-resident portion trust

- defined, 94(3)(f)(i)
- rules for, 94(3)(f)

Non-resident tax, 212–218; Reg. 800–810

- additional tax on non-resident corporation carrying on business in Canada, 219
- insurers, 219(4)–(8)
- advanced life deferred annuity (ALDA), payment from, 212(1)(l.1)
- alimony, 212(1)(f)
- annuity payments, 212(1)(o)
- assessment under Part XIII, 227(10)
- back-to-back loans, anti-avoidance, 212(3.1)–(3.81)
- back-to-back royalties, anti-avoidance, 212(3.9)–(3.94)
- Canada Pension Plan benefits, 212(1)(h)(ii) [repealed]
- election to file return re, 217
- certificate for non-resident with PE in Canada, Reg. 805.1
- deemed dividends, 214(3)
- deemed income, on, 214(4)
- deemed interest, 214(6)–(14)
- deferred profit sharing payments, 212(1)(m)
- election to file return re, 217
- dividends, 212(2)
- deemed payment of, 212.1(1), (1.1)
- from foreign business corporation, 213(1)
- eligible funeral arrangement, return of funds, 212(1)(v)
- employee benefit plan, trust payments not subject to, 212(17)
- employee life and health trust benefits, 212(1)(w)
- energy conversion grant, 212(1)(s)
- estate or trust income, 212(1)(c)
- exemption, 212(9), (10)
- home insulation grant, 212(1)(s)
- identification of obligations, Reg. 807
- income and capital combined, 214(2)
- income imputed to transferor, not taxable, 212(12)
- informant payment, 212(1)(x)
- insurers, Reg. 800–805.1, 2401, 2403
- interest, 212(1)(b)
- government bonds, exempt, 212(1)(b)(ii)
- loan to wholly-owned subsidiary, 218
- long-term debt, exempt, 212(1)(b)(vii)
- on provincial bonds, 212(6)
- replacement obligation where corporation in financial difficulty, 212(3)
- international organizations, prescribed, Reg. 806
- limitation on rate, ITAR 10(6)
- maintenance, 212(1)(f)
- management fee, 212(1)(a)
- defined, 212(4)
- motion picture films, payments for use of etc., 212(5)
- mutual fund distributions, 218.3
- no action for withholding, 227
- no deductions from income, 214(1)

- non-arm's length sale of shares by non-resident, 212.1
- obligation transferred or assigned
- non-resident deemed resident, where, 214(9)
- Part XIV, 219
- partnership payer or payee, 212(13.1), (13.2)
- patronage dividend, 212(1)(g)
- payee certificate, Reg. 805.1
- pension benefits, 212(1)(h)
- election to file return re, 217
- prescribed international organizations, Reg. 806
- refund of, 227(6)
- registered education savings plan, payments out of, 212(1)(r)
- registered retirement income fund, 212(1)(q)
- registered retirement savings plan, payments out of, 212(1)(l)
- election to file return re, 217
- regulations
- reducing amount to be deducted or withheld, 215(5)
- residents etc., re, 214(13)
- rent, royalties, 212(1)(d), 212(13)
- alternative re rents and timber royalties, 216
- retiring allowances, etc., 212(1)(j.1)
- election to file return re, 217
- securities in satisfaction of income debts, 214(4)
- spousal/child support, 212(1)(f)
- standby charges and guarantee fees, 214(15)
- supplementary unemployment benefits, 212(1)(k)
- election to file return re, 217
- TFSA, taxable payments from, 212(1)(p)
- timber royalty, 212(1)(e)
- alternative re, 216
- trust or estate income paid to, 212(1)(c)
- trust becoming non-resident, 214(3)(f)(i)(C)
- withholding of, 215, Reg. 105
- reduction of, Reg. 809

Non-resident time

- defined, 94(1)

Non-resident trust, *see* Trust (or estate): non-resident**Non-resident withholding tax**, *see* Non-resident tax**Non-residential building**, *see* Eligible non-residential building**Non-share-capital corporation**

- whether control acquired, 256(8.1)

Non-share consideration (boot)

- effect of mutual fund rollover, 132.2(2)(e)(ii)
- effect on non-arm's length sale of shares, 84.1(1)(b)
- effect on section 85 rollover, 85(1)(b)

Non-taxable obligation, defined, 240(1)**Non-taxable portion (of disability assistance payment)**

- defined, 146.4(7)

Normal reassessment period

- defined, 152(3.1)
- limitation on reassessments, 152(4), (5)

Nortel Networks spin-off, 55(3.02)**Northern Canada**

- additional car allowance in Yukon and N.W.T., Reg. 7306(c)
- credit for residing in, 110.7, Reg. 7303.1
- prescribed northern zone and prescribed intermediate zone, Reg. 7303.1
- remote work site, employment at, 6(6)

Northern Cod Compensation and Adjustment Program, *see* also Fishing: compensation programs

- overpayments repaid, deductible, 60(n)(v)
- payments received under, taxable, 56(1)(a)(vi)
- withholding of tax at source, 153(1)(m)

Northwest Territories, *see also* Northern Canada

- additional \$0.04 reasonable kilometrage allowance, Reg. 7306(c)
- *Risk Capital Investment Tax Credits Act*, corporation under

Northwest Territories (*cont'd*)

- prescribed assistance under, Reg. 6702(a.2)
- prescribed LSVCC, Reg. 6701(i)
- prescribed venture capital corporation, Reg. 6700(a)(xiii), 6700.2
- qualified investment, Reg. 4900(1)(i.12)
- tax rates, *see* introductory pages

Norway, *see also* Foreign government

- stock exchange recognized, 262

Not-for-profit organization, *see also* Non-profit organization

- defined, Canada-U.S. Tax Treaty:Art. XXIX-A:5(d)

Notary (in Quebec), *see* Lawyer**Notch provision (medical expenses)**, 118.2(1)D**Note**, *see* Promissory note**Note-taking services**

- disability supports deduction, 64(a)A(ii)F
- medical expense credit, 118.2(2)(l.41)

Notice of assessment, *see* Assessment: notice of**Notice of determination**, 152(1.2), *see also* Determination

- date of, 244(15)
- loss carryforwards, 152(1.1)
- partnership income or loss, 152(1.5)
- objection to, 165(1.15)
- presumption re mailing date, 248(14)

Notice of intent

- to revoke LSVCC, 204.81(7)
- to revoke PRPP, 147.5(24)–(26)
- defined, 147.5(24)
- to revoke RESP, 146.1(12.1), (12.2)
- appeal from, 172(3)(e.1)
- defined, 146.1(12.1)
- to revoke RPP, 147.1(11), (12)

Notice of objection, 165, *see also* Objection

- appeal following, whether new issues can be raised, 169(2.1)
- deadline, 165(1)
- determination of partnership income or loss, 165(1.15)
- extension of time to file
 - by Minister, 166.1
 - by Tax Court, 166.2
- form, 165(1), (2)
- large corporation, issues to be specified, 165(1.11)
- limitation on grounds for objection, 165(1.1)
- service, 165(2), (6)

Notice of revocation (of RESP)

- defined, 146.1(12.2)
- effect of, 146.1(13)

Notifiable transaction

- defined, 237.4(1)
- designation of specific transactions, 237.4(3)
- information return required, 237.4(4)
 - filing deadline, 237.3(5)
 - penalty for failure to file, 237.4(8)
 - reassessment deadline 3 years after filed, 152(4)(b.6)

Nova Scotia, *see also* Cape Breton; Province

- Community Economic Development Corporation, qualified investment for deferred income plans, Reg. 4900(1)(i.11)
- *Equity Tax Credit Act*, corporation under, qualified investment, Reg. 4900(1)(i.11)
- labour-sponsored venture capital corporation of
 - prescribed, Reg. 6700(a)(iii), (xiv)
- offshore area
 - amount taxable earned in, Reg. 414, 415
 - included in “province”, 124(4)“province”
 - meaning, 248(1)
- Offshore Petroleum Resources Accord, communication of information for, 241(4)(d)(vi)

- prescribed area, for electrical energy or steam processing, 127(9)“qualified property”(c.1)
- prescribed designated region, 127(9)“specified percentage”(a)(vi), Reg. 4607
- prescribed stock savings plan, Reg. 6705(c)
- qualified property acquired for use in, 127(9)“specified percentage”(a), (e)
- tax rates, *see* introductory pages
- unlimited liability company, 248(1)“corporation” (Notes)
- treaty benefit denial, Canada-U.S. Tax Treaty:Art. IV:7

Novartis/Alcon spinoff, Reg. 5600(l)**Nuclear Fuel Waste Act**

- trust required by, no tax on, 149(1)(z.2)

Numbers, *see also* Dollar amounts in legislation and regulations

- singular includes plural, *Interpretation Act* s. 33(2)

Nun

- income of, not taxed, 110(2)

Nurse

- defined, 118.4(2)

Nurse practitioner

- can certify impairment for disability credit, 118.3(1)(a.2), (a.3)
- defined, 118.4(2)

Nursery school, *see* Child care expenses**Nursing home**

- cost of care, as medical expense, 118.2(2)(b), (d)

O**OAS**, *see* Old Age Security Act benefits**OECD**, *see* Organisation for Economic Cooperation and Development**OETC**, *see* Overseas employment tax credit**OIFP**, *see* Offshore investment fund: property**OSFI risk-weighting guidelines**

- defined, 248(1)

Oaths

- administration of, 220(5), *Interpretation Act* s. 19
- defined, *Interpretation Act* s. 35(1)

Objection, 165, *see also* Appeal; Notice of objection

- assessment or reassessment, to, 165(1)
- books and records, 230(6)
- charity penalties or suspension of receipting privileges, to, 189(8)
- effect of Minister’s filing notice, 165(4)
- expense of making, deductible, 60(o)
- extension of time for filing, 166.1, 166.2
- Minister’s duty on, 165(3)
- notice of, 165(1)
- Part IV.1 tax, 187.6
- Part VI.1 tax, 191.4(2)
- Part XI.01, 207.07(3)
- Part XI.4 tax, 207.8(5)
- Part XII.2 tax, 210.2(7)
- Part XII.3 tax, 211.5
- Part XII.4 tax, 211.6(5)
- Part XII.5 tax, 211.82
- partnership income or loss, 165(1.15)
- repayment on, 164(1.1)
- restriction on collection action while underway, 225.1
- second notice not required after reassessment, 165(7)
- service of notice of, 165(2)
- waiver of right to object, 165(1.2), 169(2.2)

Obligation, *see also* Bond; Debt; Debt obligation

- assignment of
 - non-resident tax, 214(14)
 - where non-resident deemed resident, 214(9)
- defined, *ITAR* 26(12)“obligation”
- discount on, deduction for, 20(1)(f)

- Obligation** (*cont'd*)
- identification of, Reg. 807
 - issued at discount by tax-exempt person, non-resident, or government body, 16(2), (3)
 - parked, 80.01(7)
 - predecessor corporation, of, 87(6), (7)
 - principal amount of
 - defined, 248(1)
 - limitation on deductibility, 18(1)(f)
 - purchase of, by issuer, 39(3)
 - received on amalgamation, ITAR 26(23)
 - sale of
 - non-resident tax, 214(7), (7.1)
 - satisfaction of, deemed not to be disposition, 49.1
 - specified, 80.01(6)
 - taxable and non-taxable, defined, 240(1)
- Obsolescence**
- allowance re, limitation on deductibility, 18(1)(b)
- Occupational therapist**
- certification of impairment
 - for disability credit, 118.3(1)(a.2)(iv)
 - defined, 118.4(2)
 - therapy qualifying for medical expense credit, 118.2(2)(1.9)
- Offences, 238(1), 239**
- attempted evasion, 239(1)
 - calculation of income from criminal activity, 9(1) (Notes)
 - compliance orders, on conviction of, 238(2)
 - corporation officers, 242
 - court has no power to decrease punishment for, 243
 - credits, false statements, 239(1.1)
 - disclosure of confidential information, 239(2.2)
 - electronic sales suppression software, 239.1, *see also* Zapper software (or hardware)
 - failure
 - file return, 238(1)
 - keep records, 238(1)
 - keep tax deductions separate, 238(1)
 - permit investigation, 238(1)
 - withhold tax deductions, 238(1)
 - false statements, 239
 - fines, no deduction for, 18(1)(t)
 - minimum fines, 243
 - non-resident failing to give notice under s. 116(3), 238(1)
 - penalties for, *see* Penalty
 - refunds, false statements, 239(1.1)
 - RESP contributions, 146.1(2)(g.3)
 - sales suppression software, 239.1, *see also* Zapper software (or hardware)
 - saving provision, 238(3)
 - secrecy violation, 239(2.2)
 - serious, CRA may disclose information to police, 241(9.5)
 - Social Insurance Number, re, 239(2.3)
 - two or more in one complaint, 244(2)
 - zapper software, 239.1, *see also* Zapper software (or hardware)
- Office, defined, 248(1)**
- Office at home, see** Work space in home
- Office de professions du Québec**
- dues to, deductible, 8(1)(i)(vii)
- Office or employment**
- benefits from, includable in income, 6(1)
 - in home
 - conditions for deductibility, 18(12)
 - income from, 5(1)
 - deductions, 8
 - inclusions, 6
 - share options, 7
 - limitation on deductions, 8(2)
 - loss from, 5(2)
 - payment for loss of, *see* Retiring allowance
 - share option benefits, 7
- Office rent**
- paid by employee, deduction, 8(1)(i)(ii)
 - certificate of employer, 8(10)
- Officer**
- administering and enforcing Act, 220(2)
 - bribery of, non-deductible, 67.5
 - corporation, of
 - execution of documents by, 236
 - guilty of corporation's offence, 242
 - defined (under "office"), 248(1)
- Official**
- defined, re communication of taxpayer information, 241(10)
 - CRA, powers and duties delegated to, 220(2.01), Reg. 900
- Official copy of *Income Tax Act*, 2(1) (Notes)**
- Official receipt**
- defined
 - for political contributions, Reg. 2002(1)
 - for donations and gifts, Reg. 3500
- Official receipt form**
- defined
 - for political contributions, Reg. 2002(1)
 - for donations and gifts, Reg. 3500
- Off-road electric or hydrogen vehicle**
- capital cost allowance, Reg. Sch. II:Cl. 56
- Offset interest**
- against instalments, 161(2.2)
 - arrears against refund interest, 161.1
- Offsetting position**
- defined, for straddle-transaction rules, 18(17), 18(21)(c)
 - no income deferral allowed, 18(19)
- Offshore assets**
- criminal charges, 239(1) (Notes)
 - disclosure of, to CRA, 233.3
 - payments to informants for reporting to CRA, *see* Informant payments
- Offshore corporation, see** Foreign affiliate; Non-resident
- Offshore drilling vessels**
- capital cost allowance
 - additional, Reg. 1100(1)(va)
 - separate classes, Reg. 1101(2b)
- Offshore investment fund, 94.1**
- property
 - cost base, additions to, 53(1)(m)
 - designated cost, 94.1(2)
 - prescribed, Reg. 6900
- Offshore region**
- prescribed, for investment tax credit, Reg. 4609
- Offshore regulated bank**
- application of FAPI, 95(1) "investment business" (a)(i), 95(2.11)
- Offshore Tax Informant Program, see** Informant payments
- Offshore trust, see also** Trust (or estate): non-resident
- distribution from, reporting requirement, 233.5
 - taxation of, where Canadian beneficiary, 94–94.2
 - transfer of property to, reporting requirement, 233.2
- Off-the-shelf seismic data, see** Seismic testing
- Oil and gas, see** Canadian oil and gas property expense; Flow-through shares; Gulf of St. Lawrence oil exploration; Petroleum/natural gas; Resource expenses
- Oil burner mechanic**
- apprenticeship job creation credit, 127(9) "investment tax credit"
- Oil or gas field**
- unitized, *see* Unitized oil or gas field in Canada

Oil or gas well

- allowances, 65, Reg. 1207
- • additional, Reg. 1208
- certificate re, ceasing to be valid, 66.1(10)
- defined, 248(1)

Oil or gas well equipment

- capital cost allowance, Reg. Sch. II:Cl. 10(j), Sch. II:Cl. 41

Oil Pollution Compensation Fund

- trust under, 94(1)*“exempt foreign trust”(c)(iv)

Oil refinery

- capital cost allowance, Reg. Sch. II:Cl. 10(u), Sch. II:Cl. 41

Oil sands

- additional allowance, Reg. 1100(1)(y), (ya)
- included in definition of “mineral”, 248(1)
- property, *see* Oil sands property

Oil sands mine development project

- defined, 66.1(6)

Oil sands project

- defined, Reg. 1104(2)

Oil sands property

- capital cost allowance, Reg. 1100(1)(a)(xxvii.1), 1100(1)(y.1), 1100(1)(ya.1), Sch. II:Cl. 41, 41.1
- • effect of transfer due to reorganization, Reg. 1102(14.11)
- defined, Reg. 1104(2)
- separate class, Reg. 1101(4e), (4f)

Oil shale, included in definition of “mineral”, 248(1)**Oil shale deposit, exploration for**

- excluded from CEE, 66.1(6)*“Canadian exploration expense”(g), (g.2)
- excluded from CRP, 66(15)*“Canadian resource property”(b)(ii), (e), (f)

Oil Substitution Program, *see* Energy: conversion grant***Okalta Oils Ltd.* case overruled, 152(1.1)****Old Age Security Act benefits**

- “clawback” tax on, 180.2 (Part I.2)
- • deduction from income for, 60(w)
- emigration of taxpayer, no deemed disposition, 128.1(10)*“excluded right or interest”(g)(ii)
- excluded from pension income credit, 118(8)(a)
- included in income, 56(1)(a)(i)
- non-resident withholding tax, 212(1)(h)
- • U.S. residents, Canada-U.S. Tax Treaty:Art. XVIII:5
- reduction in RRSP annuity to reflect, 146(3)(b)(ii)
- repayment of, deduction for, 60(n)(i)
- withholding of benefits to cover clawback tax, 180.2(3), (4)

“Old law” defined, ITAR 12**Old person, *see* Age****Older Worker Adjustment, Program for**

- income assistance taxable, 56(1)(a)(vi), Reg. 5502(b)
- repayment of benefits, deduction, 60(n)(v)
- source withholding, 153(1)(m), Reg. 5502(b)

Olsen TCC case overruled*, 186(7)*Olympic Winter Games 2010**

- income of non-residents exempt, 115(2.3)
- • no withholding of tax at source, 153(1)(a), (g)
- payments to International Olympic Committee exempt, 212(17.1)

Online newspaper credit, 118.02**Online notice, *see* Electronic notice****Ontario, *see also* Province**

- Community Economic Development bonds, eligible for RRSP investment, Reg. 4900(1)(i.1)
- community small businesses, investment by LSVCCs, Reg. 4801.02
- Electricity Support Program, payments exempt, 81(1)(g.6)
- labour-sponsored venture capital corporation of

- • prescribed, Reg. 6700(a)(ii), (xi), Reg. 6700.2
- northern, *see* Northern Canada
- R&D super-allowance, 127(9)*“super-allowance benefit amount”
- tax rates, *see* introductory pages

Onus, *see* Burden of proof**Operating costs of automobile, *see* Automobile: operating costs****Operational mission, *see* Deployed operational mission****Optic cable, *see* Fibre optic cable****Optical scanner, for blind person**

- medical expense credit, Reg. 5700(1)
- disability supports deduction, 64(a)A(ii)(D)

Option, *see also* Stock option

- agreement, *see* Option agreement
- defined
- • for rule disallowing deductions or credits for option or share issuance, 143.3(1)
- disposition of, 13(5.3)
- exchanged, rules, 7(1.4)
- exercised, 49(3), (4), (5)
- • overpayment of tax as consequence of, 164(5), (5.1)
- expiry of, 49(2)
- • amalgamation, 87(2)(o)
- granted to charity, 110.1(10)–(13), 118.1(21)–(24)
- granting of, disposition of property, 49(1)
- included in “taxable Canadian property”, 248(1)*“taxable Canadian property”(f)
- qualified investment for RRSP etc., Reg. 4900(1)(e), (e.1)
- received on amalgamation, ITAR 26(22)
- stock, *see* Stock option
- to acquire, exercised, 49(3), (4)
- • effect of capital gains exemption, 49(3.2)
- to acquire interest in partnership or trust, reductions in ACB flowed through, 49(3.01)
- to acquire mutual fund trust units, *see* Stock option
- to acquire shares
- • by employee, *see* Stock option
- • deemed to be share for insurance demutualization, 139.1(1)
- • predecessor corporation, of, 87(5)
- • reductions in ACB flowed into ACB of shares, 49(3.01)
- to acquire specified property, exercise of, 49(3.01)
- to dispose, exercised, 49(3.1), (4)

Option agreement

- deemed to be eligible derivative subject to mark-to-market election, 10.1(4)
- excluded from inventory writedown, 10(15), 18(1)(x)
- straddle transaction restrictions, 18(17)*“position”(a)(vi), 18(9)

Optometrist

- certification of impairment
- • for disability credit, 118.3(1)(a.2)(i)
- defined, 118.4(2)

Orckit Communications spinoff, Reg. 5600(b)**Ordering**

- charitable donations
- • in order of year of contributions, 110.1(1.1)(b), 118.1(2.1)
- charity loanbacks, 118.1(17)
- credits of an individual, 118.92
- debt forgiveness rules application, 80(2)(c)
- debt obligations settled simultaneously, 80(2)(i)
- deductions
- • eligible capital property, for capital gains exemption, 110.6(17)
- • in computing taxable income, 111.1
- designation of insurance properties, Reg. 2401(3)
- disposition of depreciable property on death, 70(14)
- disposition of identical shares for capital gains exemption, 110.6(14)(a)

Ordering (*cont'd*)

- disposition of securities acquired under employee option agreement, 7(1.3), (1.31)
- dividends, out of eligible or non-eligible RDTOH, 129(1)(a)(ii)
- dividends, simultaneous, 89(3)
- foreign affiliate surplus distributions, Reg. 5901
- identical options, exercise of, 7(12)
- internal reorganization rules, 51(4), 86(3)
- mutual fund non-resident withholding tax payments, 218.3(7)
- mutual fund qualifying exchange, 132.2(1)(e)
- non-portfolio dividends distributed last from SIFT trust, 104(6)(b)B(ii)
- partnership distributions tax calculation, 197(3)
- registered investment registration, 204.4(7)
- SIFT trust non-portfolio earnings, 104(6)(b)B(ii)
- spousal RRIF attribution, 146.3(5.3)
- spousal RRSP attribution, 146(8.5)
- synthetic equity arrangement, identical properties, 112(10)
- transfer of depreciable property with pregnant loss, 13(21.2)(e)(ii)
- transfer pricing rules, 247(2.1)

Ordinarily resident, 250(3)**Ordinary taxation year**

- defined, for FAPI stub-period rules, 91(1.1)(a)

Ore

- defined
- for capital cost allowance, Reg. 1104(2)
- for resource allowance, Reg. 1206(1)
- processing of, 125.1(3)“manufacturing or processing”, Reg. 5203, Reg. Sch. II:Cl. 10(k)
- tar sands, *see* Tar sands ore

Organ transplant

- expenses of, tax credit for, 118.2(2)(1.1)

Organic assets

- defined, for FAPI of banks, 95(2.43)

Organisation for Economic Cooperation and Development

- BEPS rules, *see* Base erosion and profit shifting, anti-avoidance rules
- transfer pricing guidelines, 247

Original acquisition

- defined, 127.4(1), 204.8(1), 211.7(1)

Original amount

- defined, re royalty reimbursements, 80.2(1)(a)

Original corporate holdings percentage

- defined, for private foundations, 149.1(1)

Original editorial content

- defined, 19.01(1)

Original owner (of resource property)

- defined, 66(15)
- for resource allowance, Reg. 1206(1)
- reduction of Canadian resource expenses, 66.7(12), (12.1)
- reduction of foreign resource expenses, 66.7(13)
- successor corporation rules, 66.7

Original right, defined, ITAR 20(3)(b)**Orthopaedic shoes/boots**

- medical expense, Reg. 5700(e)

Other recipient of a gift

- defined, Reg. 3500

Outdoor advertising structures

- capital cost allowance, Reg. Sch. II:Cl. 8(l), Sch. II:Cl. 11(b)
- separate class, election, Reg. 1101(5l)

Outlays and expenses

- prescribed, for air quality improvement credit, Reg. 9700

Outstanding amount

- defined, for corporation attribution rules, 74.4(3)

“Outstanding debts to specified non-residents”

- defined, 18(5)
- no deduction where debt-equity ratio exceeds 3:1, 18(4)

Outstanding premiums

- defined, insurers, Reg. 2400(1)
- mean Canadian, *see* Mean Canadian outstanding premiums

Overburden removal cost, designated

- capital cost allowance, Reg. Sch. II:Cl. 12(q)

Overcontribution to RRSP

- tax on, 204.1(2.1), 204.2(1.1)

Overhead expenses

- R&D-related, 127(9)“qualified expenditure” Reg. 2900(4)–(10)

Overpayment amount

- defined, for corporate interest offset, 161.1(1)

Overpayment of benefits, deductible when repaid, 60(n)**Overpayment of tax**

- deemed
- Canada Child Benefit, 122.61(1)
- GST credit, 122.5(3)
- defined, 164(7)
- refund of, 164

Overseas Canadian Forces school staff

- defined, 248(1)
- members deemed resident in Canada, 250(1)(d.1), 250(2)
- option of filing as resident, 250(1)(d.1)
- prescribed order, Reg. 6600

Overseas employment tax credit, 122.3

- eliminated as of 2016, 122.3(1.01)(b), 122.3(1.02)(b)

Over-the-counter stocks

- qualified for deferred income plans before 2002, Reg. 4900(1)(s) [repealed]

Ovum

- cost of, medical expense credit, 118.2(2)(v)

Owner

- original, of resource properties, defined, 66(15)“original owner”
- predecessor, of resource property, defined, 66(15)“predecessor owner”

Owner-occupied home

- defined, for Home Buyers’ Plan withholding exemption, Reg. 104(3.1)

Ownership

- certificates of, 234, Reg. 207
- penalties for offences re, 162(4)
- change of, certificates, Reg. 502
- rights, *see* Ownership rights

Ownership rights

- defined, for insurance demutualization, 139.1(1)
- rollover to shares of insurance corporation, 139.1(4)(a), (d)

Oxygen, medical expense credit, 118.2(2)(k)**Oxygen concentrator, medical expense credit**, 118.2(2)(i)**P****PA**, *see* Pension adjustment**PA offset**

- defined, Reg. 8300(1)

PAR, *see* Pension adjustment reversal**PATY (Particular affiliate’s taxation year)**

- defined, Reg. 5907(1.6)(a)

PBC, *see* Principal-business corporation (exploration and development); Principal-business corporation (real property)**PDI**, *see* Participating debt interest**PE**, *see* Permanent establishment**PFIC**, *see* Pension fund investment corporation**PI**, *see* Prohibited investment

- PIE**, *see* Portfolio investment entity
- PIK (Payment in Kind) dividend**, *see* Stock dividend
- PLOI**, *see* Pertinent loan or indebtedness
- PPME**, *see* Pre-production mining expenditure
- PR**, *see* Principal residence
- PRPP**, *see* Pooled registered pension plan (PRPP)
- PSB**, *see* Personal services business
- PSPA**, *see* Past service pension adjustment
- PSPA withdrawals**
- defined, Reg. 8307(5)
- PUC**, *see* Paid-up capital
- Packaging material**
- deemed to be inventory, 10(5)
 - valuation of, 10(4)
- Padmore case overruled**, *Income Tax Conventions Interpretation Act s. 6.2*
- Page turner**
- disability supports deduction, 64(a)A(ii)(P)
 - medical expense credit, Reg. 5700(z)
- Paid-up capital**
- amalgamation, on, 87(3), (3.1)
 - computation of
 - additions to, 84.1(3)
 - after designation of amount re shares, 192(4.1), 194(4.2)
 - after exchange of convertible property, 51(3)
 - after internal reorganization, 86(2.1)
 - after rollover of property to corporation, 85(2.1)
 - after share-for-share exchange, 85.1(2.1)
 - Canadian Wheat Board, 135.2(3)(c)
 - corporation becoming resident in Canada, 128.1(2), (3)
 - insurance corporation following demutualization, 139.1(6)
 - holding corporation, 139.1(7)
 - on transfer of insurance business, 138(11.7)
 - contributed surplus converted into, no dividend deemed, 84(1)(c.1)–(c.3)
 - cooperative corporation, of, 89(1)“paid-up capital”(b)
 - credit union, of, 89(1)“paid-up capital”(b)
 - defined, 89(1), 248(1)
 - flow-through shares, 66.3(4)
 - foreign affiliate dumping, adjustments to, 212.3(2)(b), 212.3(7)–(9)
 - emigrating corporation, 219.1(1), (2)
 - PUC reinstatement, 212.3(9)
 - emigrating corporation, 219.1(3), (4)
 - increase in, 84(1), 84(5)(d)
 - mutual fund corporation, by, not deemed dividend, 131(4)
 - non-resident shareholder, 212.1
 - reduction of, deemed a dividend, 84(4), (4.1)
 - stripping, 84.1, 212.1
- Paid-up insurance, deduction for premiums**, 18(9.01)
- Paid-up premium**
- defined, Reg. 2700(1)
- Painter and decorator**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Pandemic**, *see* COVID-19
- Panko case overruled**, 239(3)
- Paralympic Winter Games 2010**, *see* Olympic Winter Games 2010
- Parent (corporation)**
- continuation of wound-up subsidiary, 88(1.5)
 - defined, 88(1)
 - incorporated after end of subsidiary’s year
 - computation of income and tax payable, 88(1.3)
- Parent (human)**
- compensation for child killed or missing due to crime
 - included in income, 56(1)(a.3)
 - repayment of, deductible, 60(v)
 - tax withheld at source, 153(1)(d.2), Reg. 100(1)“remuneration”(g.1)
 - dependent, 118(6)(b)
 - extended meaning, 252(2)
- Parental leave**
- qualifying period for pension earnings
 - Reg. 8507(3)
- Parity/advisory committee**
- dues paid by employee, deduction, 8(1)(i)(vi)
- Parked obligation (debt parking)**
- deemed settled, 80.01(8)(a)
 - defined, 80.01(7)
- Parking**
- automobile or other vehicle
 - excluded from benefit for operating costs and standby charge, 6(1.1)
 - taxable benefit, 6(1)(a), 6(1.1)
 - exception for disabled employee, 6(16)
 - debt, *see* Debt parking
- Parking area**
- capital cost allowance, Reg. Sch. II:Cl. 1(g)
 - for mine, Reg. Sch. II:Cl. 10(l)
- Parliament**, *see also* Government
- defined, *Interpretation Act* 35(1)
 - member of, *see* Member: Parliament
- Parson**, *see* Clergy
- Part I.2 tax (Old Age Security clawback)**
- imposed, 180.2(2)
 - instalments required, 156.1(1)“net tax owing”A
- Part IV tax**
- imposed, 186(1)
 - refund of, 129(1)
- Part VI tax**
- imposed, 190.1(1)
- Part VI.1 tax**
- deduction from taxable income re, 110(1)(k)
 - liability for, transferred on amalgamation, 87(2)(ss)
 - payment of, 157(1)
- Part X.5 tax (RESP accumulated income payments)**
- imposed, 204.94(2)
 - instalments required, 156.1(1)“net tax owing”A
- Part XI.4 tax (excess EPSP amounts)**
- imposed, 207.8(2)
 - instalments required, 156.1(1)“net tax owing”A
- Part XI.5 tax (ELHT owning share or debt of participating employer)**
- imposed, 207.9(2)
- Part XII.2 tax**, 210.2, 210.3
- credit for, 210.2(3)
 - included in beneficiary’s income, 104(31)
 - deduction for, 104(30)
- Part XII.6 tax**
- deductible, 20(1)(nn)
- Part-time attendant**
- deduction from income, 64(a)A(ii)(J)
 - medical expense credit, 118.2(2)(b.1)
- Part-year resident**, 114
- cash method of computing income, on, 28(4)
 - farmer/fisherman, 28(4)
 - foreign tax credit, 126(2.2), (3)
 - “income for the year”, 120(3)
 - tax credits, 118.91
- Parthenon Investments case overruled**, 256(6.1)

Partial debt obligation

- treated the same as entire obligation, 248(27)

Partial dependency, 118.3(3)**Partial disposition**

- cost base of property remaining, 53(2)(d)
- specified debt obligation, 142.4(9)

Partial public health restriction

- defined, Reg. 8901.2(0.1)
- qualifying, *see* Qualifying partial public health restriction

Participant (re butterfly transactions)

- defined, 55(1)“permitted exchange”(b)
- specified debt obligation, 142.4(9)

Participate

- defined, for third-party penalty, 163.2(1)

Participating debt interest

- defined, 212(3)
- subject to non-resident withholding tax, 212(1)(b)(ii)
- treated as equity for SIFT rules, 122.1(1)“equity”(d)(ii)

Participating employer

- deferred profit sharing plan, 147(1.1)
- of employee life and health trust, defined, 207.9(1)
- pooled registered pension plan, 147.5(1)
- registered pension plan, 147.1(1), Reg. 8308(7)

Participating farmer (in Canadian Wheat Board Farmers' Trust)

- acquisition of eligible unit of trust by, 135.2(5)
- death of, 135.2(6), (8)
- defined, 135.2(1)
- disposition of trust unit by, 135.2(9)

Participating jurisdiction

- defined, for Common Reporting Standard, 270(1)

Participating jurisdiction financial institution

- defined, for Common Reporting Standard, 270(1)

Participating life insurance policy

- defined, 138(12), 211(1), Reg. 1408(1)

Participating percentage

- defined, for foreign accrual property income, 95(1)

Participation certificate

- no interest payable on tax due, 161(5)

Participation period

- defined
 - for Home Buyers' Plan, 146.01(1)
 - for Lifelong Learning Plan, 146.02(1)

Partition of property

- rules, 248(20)–(23)
 - disproportionate partition, 248(20)
 - proportionate partition, 248(21)

Partner, *see also* Partnership

- active, application of debt forgiveness rules, 80(1)“forgiven amount”B(k)
- agreement by, validity, 96(3)
- automobile provided to
 - amount included in income, 12(1)(y)
- becoming resident in Canada, 96(8)
- contribution of property to partnership, 97(1)
- debt forgiveness rules, application where partnership issued debt obligation, 80(15)
- debt owing by, where treated as partnership debt, 80(2)(n)
- deceased
 - value of rights or things to date of death, 53(1)(e)(v)
- deemed, for certain purposes, 248(13)
- depreciable property acquired with government assistance, 13(7.2)
- election by, *see* Partnership: election by members
- election re fiscal period of terminated partnership, 99(2)–(4)
- election to renounce investment tax credit, 127(8.4)

- inducement payments or reimbursement received by, 12(2.1)
 - limited, *see* Limited partner
 - non-resident
 - creates non-Canadian partnership, 102(1)
 - payments to, withholding tax, 212(13.1)(b)
 - notice to, 244(20)
 - objection to determination of partnership's income or loss, 165(1.15)
 - obligation to pay interest re land purchase, 18(2.1)
 - passive, *see* Limited partner; Specified member (of partnership)
 - retiring, allocation of share of income to, 96(1.1)
 - deduction, 96(1.3)
 - deemed carrying on business in Canada, 96(1.6)
 - right to share in income
 - deemed not capital property, 96(1.4)
 - return on death of, 150(4)
 - rules for computing income etc., 96(1)
 - share of exploration and development expense, 66.1(7), 66.2(6), (7)
 - tax matters, designation by partnership, 165(1.15)
- Partnership**, *see also* Limited partnership; Partner; Partnership interest
- accrued interest income, 12(3)
 - “acquisition cost”, ITAR 20(4)“acquisition cost”
 - acquisition of foreign affiliate from, 91(7)
 - agreement by members, validity, 96(3)
 - agreement to share income
 - in unreasonable proportions, 103(1.1)
 - to avoid tax, 103(1)
 - allocation to retiring partner, 96(1.1)
 - deduction, 96(1.3)
 - annuity contract, interest in, 12.2
 - assumptions, 96(2)
 - business of, continued as sole proprietorship, 98(5)
 - Canadian, defined, 102(1)
 - Canadian development expenses of, election to exclude, 66.2(5)“Canadian development expense”(f)
 - Canadian oil and gas property expenses of, election to exclude, 66.4(5)“Canadian oil and gas property expense”(b)
 - Canadian partnership, defined, 102(1)
 - Canadian securities owned by, 39(4.1)
 - capital cost allowance, Reg. 1102(1a)
 - ceasing to exist, 98
 - continuation of, by another partnership, 98.1(2)
 - continued by new partnership, 98(6)
 - continued by proprietor, 98(5)
 - deemed proceeds of disposition, 98(2)
 - disposition of property, 98(1)
 - property transferred to corporation, 85(3)
 - rules applicable, 98(3), (4)
 - charitable donations, *see* gifts made by (below)
 - common-law, *see* Common-law partner
 - continuation
 - as new partnership, 98(6)
 - by another partnership, 98.1(2)
 - by proprietor, 98(5)
 - contribution of property to, 97
 - capital cost to partner exceeds proceeds, where, 97(4)
 - majority interest partner, by, 40(3.3), (3.4)
 - corporate
 - gross revenue from active businesses, 125.1(4)
 - small business deduction, 125(6)
 - “specified partnership income”, 125(7)
 - “specified partnership loss”, 125(7)
 - corporation as member of
 - inclusion of stub period income, 34.2(2)
 - corporation deemed member, 125(6.1)
 - death of partner, return, 150(4)

Index

Partnership (*cont'd*)

- debt obligation issued by, 80(13)E(a), (14)(b), (15), (18)
- deemed person for affiliated persons definition, 251.1(4)(b)
- deemed person for debt forgiveness rules, 80(1), 80.01(1)
- deemed person for flow-through share provisions, 66(16)
- deemed person for Part IV.1 tax, 187.4(c)
- deemed person for scientific research tax credit rules, 127.3(7)
- deemed person for seizure of property by creditor, 79(1)“person”, 79.1(1)“person”
- deemed person for tax on carved-out property, 209(6)
- deemed person for tax shelter identification rules, 237.1(1)
- deemed taxpayer for tax shelter investment cost rules, 143.2(1)“taxpayer”
- deemed person for withholding tax obligations, 227(5.2), (15)
- defined, nowhere (*see case law*)
- depreciable property, ITAR 20(3), (5)
- determination of income or loss, 152(1.4)–(1.8)
 - objection to determination, 165(1.15)
- distributions tax, 197, *see SIFT partnership*
- distributions, tax on, *see SIFT partnership*
- dividend received from foreign affiliate, 93.1(2)
 - from pre-acquisition surplus, 92(4)–(6)
- election by members
 - date to be made, 96(4)
 - late-filed, 96(5)
 - penalty, 96(6), (7)
 - special cases, 96(5.1)
 - re property transferred, 97(2)
 - certain windups excluded, 97(3)
 - validity, 96(3)
- exempt, for resource allowance claims, Reg. 1206(1)
- exempt persons, anti-avoidance rule, 96(8)
- family farm or fishing, *see Family farm or fishing corporation/partnership*
- farming business of
 - disposition of land used in, 101
- financial institution, 142.2(1)“financial institution”(b)
- fiscal period of, 249.1(1)(b)(ii), (c)
 - election to align year-end with corporate partners, 249.1(8)–(11)
- foreign accrual property income of, 93.1(5), (6)
- foreign, partner becoming subject to Canadian tax, 96(8)
- foreign resource property disposition, 59(1.1)
- fuel tax rebate of, 111(11)
- gains and losses, determination of, 96(1.7)
- gifts made by
 - corporation’s share, 110.1(4)
 - individual’s share, 118.1(8)
- includes another partnership that is a member, 102(2)
- income of, 12(1)(l), 96(1)
 - determination by CRA, 152(1.4)–(1.8)
 - income splitting, 103
 - minimum tax applicable to partner, 127.52(2)
- information return, Reg. 229
 - early disclosure for public partnership, Reg. 229.1
 - failure to make, 162(7.1), (8), (8.1)
 - foreign-based information, 233.2–233.5
 - demand for, 233(2)
- interest accrued, 12(3)
- interest in, *see Partnership interest*
- interest on debt relating to acquisition of land, 18(3)“interest on debt relating to the acquisition of land”(b)
- investing in residential property or Canadian film
 - capital cost allowance limitation, 127.52(2)
- investment tax credit, allocation to partners, 127(8)
 - non-limited partners, 127(8.3)
- life insurance policy, interest in, 12.2
- limited, *see Limited partnership*
- limited liability, *see Limited liability partnership*
- look-through rules, *see Tiers of partnerships*
- loss of, minimum tax applicable to partner, 127.52(2)
- majority interest partner, 248(1)
- manufacturing etc., profits, Reg. 5204
- member, *see Partner*
- name, reference to on documents, 244(20)(a)
- new, continuing predecessor partnership, 98(6)
- non-Canadian
 - withholding tax on payments to, 212(13.1)(b)
- non-existent
 - extended deadline for assessment of non-partners, 152(1.8)
- non-resident controlled
 - corporate member’s specified income deemed nil, 125(6.2)
 - deemed, 125(6.3)
- notice to, 244(20)
- Part IV.1 tax, 187.4
- Part XIII tax, application of, 212(13.1), (13.2)
- partner, *see Partner*
- “percentage of member”, ITAR 20(4)“percentage”
- personal-use property of, 46(4)
- professional, *see Professional partnership*
- property
 - right to receive
 - adjusted cost base, 53(2)(o)
- public, *see Public partnership; SIFT partnership*
- publicly traded, tax on distributions, *see SIFT partnership*
- qualifying Canadian, *see Qualifying Canadian partnership*
- reference to, constitutes reference to partners, 244(20)
- renounced resource expenses, return to be filed re, 66(12.69)
 - late filing, 66(12.74), (12.75)
- research and development expenses, no carryforward, 96(1)(e.1)
- resident of, *Income Tax Conventions Interpretation Act* s. 6.2
- residual interest in, 98.1(1)
- resource expenditures, by members, 66(18)
 - allocation of assistance, 66.1(7), 66.2(6), (7), 66.4(6), (7)
- resource expenses of
 - deemed made by partners, 66(18)
 - election by partner to exclude, 66.2(5)“Canadian development expense”(f), 66.4(5)“Canadian oil and gas property expense”(b)
 - not claimed at partnership level, 96(1)(d), 66.1(7), 66.2(6), (7), 66.4(6), (7)
 - renounced, 66(12.69), (12.74), (12.75)
- resource expenses renounced to
 - non-arm’s length relationship deemed, 66(17)
- return, *see information return (above)*
- right to share in income
 - disposition of, 96(1.2)
 - death of taxpayer, on, 96(1.5)
 - deduction, 96(1.3)
 - rules for computing income etc., 96(1)
- rollover to, 97(2)
- scientific research tax credit, 127.3(4), (7)
- service of documents on, 244(20)(b)
- small business bond issued by, 15.2(6)
- small business deduction, 125(6)
- soft costs relating to construction, 18(3.1)(b), 18(3.2)(b)(iii)
- specified member, defined, 248(1)
- taxable dividends received by, 186(6)
- taxation year of, 96(1)(b)
- terminated
 - fiscal period of, 99(1)
 - member’s election re fiscal period, 99
- tiered, *see Tiers of partnerships*
- transfer of property by partner to, 97(1), (2)
- transfer of property to corporation, 85(2)
 - partnership wound up, 85(3)

Partnership (cont'd)

- “undepreciated cost to the partnership”, ITAR 20(4)“undepreciated cost to the partnership”
 - unit, *see* Limited partnership unit; Partnership interest
 - value of rights or things on death, 53(1)(e)(v)
 - winding-up of, *see* ceasing to exist (*above*)
 - withholding tax, 227(15)
- Partnership distributions tax**, 197, *see* SIFT partnership
- Partnership interest**, *see also* Limited partnership unit
- acquired through amalgamation, 87(2)(e.1)
 - adjusted cost base
 - additions to, 53(1)(e)
 - deductions from, 53(2)(c)
 - negative, whether capital gain, 40(3)–(3.2)
 - recomputation of following debt forgiveness, 53(4)–(6)
 - artificial transactions, 40(3.13)
 - borrowed money used to acquire, 20.1(5)
 - deductions from, 53(2)(c)
 - capital contribution where other person withdraws funds, 40(3.13)
 - constitutes specified property, 54“specified property”(c)
 - disposition of, 100
 - gain from, 100(2), (2.1)
 - loss from, 100(4)
 - subsequent to debt forgiveness, deemed capital gain, 80.03(2), (4)
 - distributed to parent on winding-up of subsidiary, 88(1)(a.2), (c)
 - donation to charity, whether no capital gain, 38(a.3)
 - expenses of selling or financing, 20(1)(e)
 - foreign affiliate’s, adjusted cost base of, 95(2)(j)
 - issuance of, whether deductible to partnership, 143.3(4)
 - limited liability partnership, *see* Limited liability partnership
 - loan of, 96(1.7)
 - owned on Dec. 31/71, ITAR 26(9)–(9.4)
 - person having, deemed member, 248(13)
 - qualified investment for RRSP etc., Reg. 4900(1)(n)
 - residual, 98.1(1)
 - transfer on death, 98.2
 - whether taxable Canadian property, 248(1)“taxable Canadian property”(g)

Parts

- deemed to be inventory, 10(5)
- valuation of, 10(4)

Partsperson

- apprenticeship job creation credit, 127(9)“investment tax credit”

Party planning or organizing relief (COVID), Reg.

- 8901.1(2)(b)(xx)(B), *see also* Qualifying tourism or hospitality entity

Pass

- transit, *see* Public Transit Pass Credit

Passenger automobile

- defined (for pre-1966 cars only), Reg. 1102(11)

Passenger vehicle, *see also* Automobile; Zero-emission passenger vehicle

- acquired at non-arm’s length
 - deemed cost of, 13(7)(h)
- capital cost limited to \$24,000, 13(7)(g)
- defined, 248(1)
- electric, *see* Zero-emission passenger vehicle
- hydrogen, *see* Zero-emission passenger vehicle
- interest on money borrowed to buy
 - limitation on deductibility, 67.2
- leasing costs
 - limitation on deductibility, 67.3
 - more than one lessor, limitation on deductibility, 67.4
- luxury, limitations on, *see also* Luxury Items Tax

- bad debt from sales of, 20(4)
- capital cost allowance, 13(7)(g), Reg. 1101(1af), 7307(1), Reg. Sch. II:Cl. 10.1
 - year of disposition, Reg. 1100(2.5)
- interest deductibility, 67.2, Reg. 7307(2)
- leasing cost, 67.3, 67.4, Reg. 7307(3), (4)
- terminal loss disallowed, 20(16.1), Reg. 1100(2.5)
- recapture exception, 13(2)
- transferred to corporation by shareholder
 - capital cost or cost, 85(1)(e.4)

Passive income

- dividends, 82(1), 90
- foreign affiliate, *see* Foreign accrual property income
- generally, 9(1)
- interest, 12(1)(c), 12(4)
- non-resident, of, 212
- private corporations
 - refundable dividend tax on hand, 129(1), (4), (5)
 - small business deduction grind, 125(5.1)(b), (5.2)

Passive NFE

- defined, for Common Reporting Standard, 270(1)

Passive partner, *see* Limited partner; Specified member (of partnership)**Past service event**

- defined, 147.1(1), Reg. 8300(1), (2)
- restrictions on pension benefits, 147.1(10)

Past service pension adjustment

- accumulated, Reg. 8303(1)(a)
- defined, 248(1), Reg. 8303
- foreign plan, Reg. 8308.1(5), (6)
- net
 - calculation of, 204.2(1.3)
 - defined, 146(1)“net past service pension adjustment”
 - occurring in 1991, Reg. 8303(2.1)
 - provisional, Reg. 8303(2), (3)

Patent

- application, legal fees deductible, 20(1)(cc)
- capital cost allowance
 - 25% rate, Reg. 1100(1)(a)(xxx), 1100(9.1), Reg. Sch. II:Cl. 44
 - allocated over life of patent, Reg. 1101(1)(c), 1100(9), Reg. Sch. II:Cl. 14
- non-resident withholding tax, 212(1)(d)
- paid to U.S. resident, Canada-U.S. Tax Treaty:Art. XII:3(c)

Patient

- defined, 118.2(2)(a)
- medical expenses for, 118.2(2)

Patronage

- allocation in proportion to
 - defined, 135(4), Reg. 4901(2)
 - holding forth prospect of, 135(5)
 - members/non-members, 135(2)

Patronage dividends, 135

- carryover of deduction, 135(2.1)
- deduction, 20(1)(u), 135(1)
 - exclusion where non-arm’s length, 135(1.1)
- paid to non-resident, 212(1)(g)
- payments, information return, Reg. 218
- receipt of, income, 135(7)
- where marketing board used, 135(8)

Pattern

- capital cost allowance, Reg. Sch. II:Cl. 12(d)

Pay equity

- averaging of settlement received, 110.2, 120.31

Pay period

- defined
 - for employee source withholdings, Reg. 100(1)

- Pay period (*cont'd*)
 - for exemption test policy (life insurance), Reg. 310
- Payable**
 - meaning of, 104(24)
- Payee**
 - defined, Reg. 237(1)
- Payee certificate for non-resident**, Reg. 805.1
- Payer**
 - defined, for hybrid mismatch arrangement rules, 18.4(1)
- Payment**, *see also* Deductions in computing income; Expenses; Income; Payment of tax
 - based on production or use, income, 12(1)(g)
 - defined, for hybrid mismatch arrangement rules, 18.4(1)
 - ITA, under, not deductible from business or property income, 18(1)(t)
 - instalment, *see* Instalment payments
 - lump sum, withholding, Reg. 103
 - maintenance and support, *see* Support payments (spousal or child)
 - non-residents, to, Part XIII
 - information return, Reg. 202
 - periodic, *see* Periodic payments
 - shareholder or prospective shareholder, to, 15(7)
 - from corporation, 15(1)
 - tax, *see* Payment of tax
 - tax transfer, to provinces, 154, Reg. 3300
 - to CRA over \$10,000, must be electronic, 160.5(2), 162(7.4)
- Payment card corporation**, *see* Prescribed payment card corporation share
- Payment of tax**, 153, 156, 158
 - balance due day, defined, 248(1)
 - carved-out income, on, 209(4)
 - certificate before distribution, 159(2)
 - failure to obtain, 159(3)
 - corporations, 157
 - where instalments not required, 157(2.1)
 - death of taxpayer, on
 - election to pay in instalments, 159(5)
 - deduction at source, 153(1)
 - deemed, *see also* refundable credits
 - trust, by, re non-qualified investment, 202(6)
 - deferral of
 - appeal for purpose of, penalty, 179.1
 - deferred income plans
 - over-contributions, 204.3
 - property held by, 207.2
 - departure tax
 - election to defer, 220(4.5)–(4.54), Reg. 1300
 - farmers and fishermen, 155, 156.1
 - individuals, 153(2), 156, 156.1
 - instalment, *see also* Instalment payments (Instalments)
 - non-residents, 215
 - on behalf of others, 159
 - Part I.1, 180.1(3)(b)
 - Part I.2, 180.2(5)(b)
 - Part II, 183(2)
 - Part III, 185(2)
 - Part III.1, 185.2(4)
 - Part IV, 187(2)
 - Part IV.1, 187.2
 - Part V, 188(1.1), 189(6)
 - Part VI, 190.21
 - Part VI.1, 191.1(1)
 - Part IX, 196
 - Part IX.1, 197(7)
 - Part X, 198(2)
 - Part X.1, 204.3(1)
 - Part X.2, 204.7(1)
 - Part X.3, 204.86(1)(c)
 - Part X.4, 204.92(c)
 - Part XI.1, 207.2(1)
 - Part XI.2, 207.4
 - Part XI.3, 207.7(3)
 - Part XI.4, 207.8(4)
 - Part XII.1, 209(4)
 - Part XII.3, 211.4
 - Part XII.4, 211.6(4)
 - Part XII.5 tax, 211.8(2), 211.82
 - Part XIII, 215(1)
 - Part XIV, 219(1)
 - postponement, where income in blocked currency, 161(6)
 - public authorities disposing of cultural property, 207.3, 207.4
 - registered investment, 204.7
 - remainder payment, 158
 - retirement compensation arrangement, 207.7(3)
 - security for, 220(4)–(4.4), Reg. Part XXII
 - taxpayer leaving Canada, 226(1)
 - transfer among tax accounts, 221.2
 - trustee, etc., 159(1)
 - personal liability, 159(3)
- Payment rate**
 - for carbon tax refund to farmers, 127.42(1)
- Payoffs**
 - no deduction for, 67.5
- Payroll deduction**, *see* Withholding
- Payroll taxes (provincial)**
 - deductibility of, 18
- Payroll withholding**, *see* Withholding
- Peak shaving facility (re LNG liquefaction)**
 - defined, Reg. 1104(18)
- Pearen case overruled**, 118.2(2.21)
- Peat**
 - property for use in harvesting, 127(9)“qualified property”
- Penalty**, *see also* Offences
 - appeal without reasonable grounds, 179.1
 - burden of proof of offence on Minister, 163(3)
 - charity, *see* Registered charity: penalties
 - confidential information, contraventions re, 239(2.2)
 - conviction of offence, on, 238(1), 239
 - second penalty, when applicable, 239(3)
 - corporation’s failure to file information return, 162(10)
 - court has no power to decrease punishment, 243
 - deficient instalments of tax, 163.1
 - destruction of records, for, 239(1)
 - dishonoured cheque, for, 162(11)
 - electronic sales suppression software, 163.3, *see also* Zapper software (or hardware)
 - failure to file information return electronically, 162(7.02)
 - failure to file prescribed form, R&D corporation, 149(7.1)
 - failure to file return, 162(1)
 - electronically, where required, 162(7.2)
 - repeated penalties, 162(2)
 - trustees etc., 162(3)
 - failure to provide SR&ED claim preparer information, 162(5.1)
 - failure to provide Taxpayer Identification Number to financial institution for provision to foreign tax authorities, 281(3)
 - failure to remit tax withheld, 227(9)
 - applicable only on amounts over \$500, 227(9.1)
 - salary or wages, from, 227(9.5)
 - failure to withhold tax, 227(8)
 - salary or wages, from, 227(8.5)
 - false statement, 163(2), 239(1)
 - by third party or tax preparer, 163.2
 - charity receipt, 188.1(9), (10)
 - re renunciation of resource expenses, 163(2.2)

- Penalty (*cont'd*)
- frivolous appeal, 179.1
 - gross negligence, 163(2)
 - incomplete return, 162(5)
 - incorrect tax shelter identification number, for providing, 239(2.1)
 - interest on, 161(11)
 - large corporations, late return, 235
 - late-filed election, 220(3.5)
 - • capital gains exemption triggering, 110.6(26), (29)
 - • disposition of share in foreign affiliate, 93(6)
 - • partners, 96(6)
 - • transfer to corporations, 85(8), (9)
 - late filing of form re renunciation of resource expenses, 66(12.75)
 - late filing of return, 162(1), 235
 - late instalments of tax, 163.1
 - misrepresentation, 163(2)
 - • by third party or tax preparer, 163.2
 - not deductible from income, 18(1)(t), 67.6
 - ownership certificates, offences re, 162(4)
 - Part IV.1 tax, 187.6
 - Part VI.1 tax, 191.4(2)
 - Part XII.2 tax, 210.2(7)
 - Part XII.3 tax, 211.5
 - Part XII.4 tax, 211.6(5)
 - Part XII.5 tax, 211.82
 - partnership information return, failure to file, 162(7.1), (8.1)
 - payment over \$10,000 made non-electronically, 162(7.4)
 - registered charity, *see* Registered charity: penalties
 - regulations, failure to comply with, 162(7)
 - remittance over \$10,000 made non-electronically, 162(7.4)
 - repeated assessments of, 162(2)
 - repeated failures to report an amount of income, 163(1)
 - sales suppression software, 163.3, *see also* Zapper software (or hardware)
 - Social Insurance Number
 - • failure to provide, 162(2)
 - • wrongful communication of, 239(2.3)
 - tax advisor, 163.2
 - tax shelter identification number, offences re, 237.1(7.4)
 - • deduction disallowed while penalty unpaid, 237.1(6.1)
 - third party, 163.2
 - transfer pricing, 247(3), (11)
 - waiver of, by Minister, 220(3.1)
 - zapper software, 163.3, *see also* Zapper software (or hardware)
- Pension**, *see also* Pension plan; Canada Pension Plan/Quebec Pension Plan
- adjustment, *see* Pension adjustment
 - benefits, *see also* income (below)
 - • income, 56(1)(a)(i)
 - • • exemption, 57
 - • paid to non-resident, 212(1)(h)
 - • • election to file return, 217
 - • paid to U.S. resident, Canada-U.S. Tax Treaty:Art. XVIII
 - • paid to widow(er), 57(5)
 - • received in error, deduction for repayment, 60(n.1)
 - • transferred to another plan, deductible, 60(j)
 - • unpaid, 78(4)
 - bridging benefits, *see* Bridging benefits
 - credit, *see* Pension credit
 - defined, *Income Tax Conventions Interpretation Act* s. 5; Canada-U.S. Tax Treaty:Art. XVIII:3; Canada-U.K. Tax Treaty:Art. 17:3
 - disability benefit
 - • constitutes earned income for RRSP, 146(1)“earned income”(b.1)
 - Halifax disaster, exempt, 81(1)(f)
 - income, *see also* benefits (above)
 - • credit for, 118(3)
 - • • unused, transfer to spouse, 118.8
 - • defined, 60.03(1), 118(7)
 - • qualified, defined, 118(7)
 - • splitting with spouse
 - • • deduction to pensioner, 60(c)
 - • • income inclusion to transferee, 56(1)(a.2)
 - • • joint liability for tax, 160(1.3)
 - • • revocation of election, 220(3.201)
 - • • rules, 60.03
 - • • source deductions, 153(1.1), (2)
 - paid to non-resident, 212(1)(h)
 - • election to file return, 217
 - paid to U.S. resident, Canada-U.S. Tax Treaty:Art. XVIII
 - periodic payments, *see* Periodic pension payment
 - plan, *see* Pension plan
 - RCMP, exempt, 81(1)(i)
 - service, exempt, 81(1)(d)
 - • from other country, exempt, 81(1)(e)
 - superannuation or pension benefits
 - • defined, 248(1)
 - • surplus, *see* Pension surplus
- Pension Act, pension under, exempt**, 81(1)(d)
- Pension adjustment**, *see also* Pension credit
- defined, 248(1), Reg. 8301(1), *see also* Pension credit
 - limits, 147(5.1)(c), 147.1(8), (9), Reg. 8506(2), 8509(12)
 - past service, *see* Past service pension adjustment
 - reversal, *see* Pension adjustment reversal
 - special rules, Reg. 8308
- Pension adjustment correction**, *see also* Permitted corrective contribution (to pension plan)
- defined, Reg. 8304.1(16)
 - included in “total pension adjustment reversal”, Reg. 8304.1(1)(b)
 - information return required, Reg. 8402.01(4.1)
- Pension adjustment reversal**
- defined, 248(1)“total pension adjustment reversal”, Reg. 8304.1
 - effect of, 146(1)“RRSP deduction limit”R, 146(1)“unused RRSP deduction room”(b)R, 204.2(1.1)(b)R
 - regulations respecting, 147.1(18)(d), (t), Reg. 8304.1
 - reporting requirements, Reg. 8402.01
- Pension benefits**, *see* Pension: benefits; Pension: income
- Pension benefits act, provincial**
- registration under, 147.1(2)(a)(iii)
- Pension Benefits Standards Act**
- administration of
 - • communication of information obtained under ITA, 241(4)(d)(vii)
 - registration under, 147.1(2)(a)(iii)
- Pension corporation**
- exemption, 149(1)(o.1), (o.2)
- Pension credit**, *see also* Pension adjustment
- artificial reduction of, Reg. 8503(14)
 - calculation of, Reg. 8301
 - • deferred profit sharing plan, Reg. 8301(2)
 - • foreign plan, Reg. 8308.1(2)–(4)
 - • registered pension plan
 - • • defined benefit provision
 - • • • multi-employer plan, Reg. 8301(7)
 - • • • ordinary plan, Reg. 8301(6)
 - • • • specified multi-employer plan, Reg. 8301(5)
 - • • downsizing benefits, effect of, Reg. 8308(9)
 - • • money purchase provision, Reg. 8301(4)
 - • • non-vested termination, Reg. 8301(8), (9)
 - • • remuneration for prior years, Reg. 8308(3)(b)
 - • • replacement of benefits, effect of, Reg. 8304

- Pension credit (*cont'd*)
- transitional rule, Reg. 8301(10)
 - rounded to nearest dollar, Reg. 8311
 - specified retirement arrangement, Reg. 8308.3(2)–(5)
 - United States treaty, tax credit, Reg. 8308.1(2.1)
 - constitutes pension adjustment, Reg. 8301(1)
 - DPSP contribution limits, effect on, 147(5.1)
 - multi-employer plan, effect on PA limit, 147.1(9)
 - non-refundable credit, for \$1,000 of pension income, 118(3)
 - reporting of, Reg. 8401(3)
- Pension fund investment corporation**, 149(1)(o.2)(iii)
- Pension fund of a governmental entity, international organization or central bank**
- defined, for Common Reporting Standard, 270(1)
- Pension fund real estate corporation**, 149(1)(o.2)(ii)
- Pension income**, *see also* Pension: benefits; Pension: income
- defined, 60.03(1), 118(7)
- Pension plan**, *see also* Registered pension plan
- appeal from refusal to register, 172(3)(f), 172(5)
 - benefits flowed through trust, 104(27)
 - Canada, *see* Canada Pension Plan/Quebec Pension Plan
 - contract under, 254
 - dollar limits, *see* Pension adjustment
 - foreign plan, *see* Foreign plan (pension plan)
 - individual, Reg. 8515
 - legal expenses of collecting or establishing right to benefit under
 - deduction for, 60(o.1)
 - income when recovered, 56(1)(1.1)
 - provincial, *see* Specified pension plan
 - pooled, *see* Pooled pension plan; Pooled registered pension plan (PRPP)
 - Quebec, *see* Canada Pension Plan/Quebec Pension Plan
 - registered, *see* Registered pension plan
 - Saskatchewan, *see* Specified pension plan
 - surplus, *see* Pension surplus
 - transfers between, 147.3
- Pension surplus**
- transfer of, 147.3(4.1), (7.1)
- Pension transferee**
- defined, 60.03(1)
 - income inclusion to, for split pension income, 56(1)(a.2)
 - joint liability for tax on split pension income, 160(1.3)
 - source deductions deemed withheld for, 153(2)
- Pension trust**
- exempt, 149(1)(o)
- Pensionable service**
- defined, Reg. 8500(1)
- Pensioner**
- deduction to, for split pension income, 60(c)
 - defined, 60.03(1)
 - joint liability for tax on split pension income, 160(1.3)
- Percentage**
- rates of tax, *see* Rates of tax
 - specified, *see* Specified percentage
- Performer**, *see* Actor
- Period of disability**
- defined, Reg. 8500(1)
- Period of reduced services**
- defined, Reg. 8300(1)
- Periodic child care expense amount**
- defined, 63(3)
- Periodic payments**
- accrual to date of death, 70(1)(a)
 - alimony/maintenance/support, 56(1)(b)–(c.2), 56.1, 60(b)–(c.2), 60.1
 - pension, *see* Periodic pension payment
 - tax deduction, determination of, Reg. 102
- Periodic pension payment**
- defined, *Income Tax Conventions Interpretation Act* s. 5
- Periodical**
- advertising in, limitation, 19.01(2)–(4)
 - defined, 19.01(1)
 - edition of, meaning, 19.01(6)
- Permanent establishment**
- defined
 - Canada–U.S. Tax Convention, Canada–U.S. Tax Treaty:Art. V
 - corporation, Reg. 400, 8600
 - for country-by-country reporting, 233.8(1), Reg. 8201
 - for FAPI purposes, 95(1), Reg. 5906(2)
 - for leasing-property rules, 16.1(1), Reg. 8201
 - for restrictive-covenant rules, 56.4(1), Reg. 8201
 - for various purposes, Reg. 8201
 - individual, Reg. 2600
 - dividend from non-resident corporation having, 112(2), Reg. 8201
 - for allocating income among provinces
 - of corporation, Reg. 400
 - of individual, Reg. 2600
 - international tax treaties
 - applies for FAPI purposes, Reg. 5906(2)(a)(i), 5906(2)(b)(i)
 - Canada–U.K. convention, Art. 5
 - Canada–U.S. convention, Canada–U.S. Tax Treaty:Art. V
 - profits allocated to, *Income Tax Conventions Interpretation Act* s. 4
 - securities lending arrangement, 260(5), Reg. 8201
 - specified leasing property, 16.1(1), Reg. 8201
 - tax on property forming part of, Canada–U.S. Tax Treaty:Art. XXIII:2
- Permitted acquisition**
- defined, for butterfly, 55(1)
- Permitted corrective contribution (to pension plan)**, *see also* Pension adjustment correction
- deductible to employee, 147.1(1)(a)(ii)
 - deductible to employer, 147.1(4)(a)(ii)
 - defined, 147.1(1)
 - information return required, Reg. 8402(4)
 - permitted, 147.1(20)
- Permitted deferral**
- defined, for small business investment capital gain rollover, 44.1(1)
- Permitted exchange**
- defined, for butterfly, 55(1)
- Permitted redemption**
- defined, for butterfly, 55(1)
- Perpetual poverty, vow of**, 110(2)
- Person**, *see also* Taxpayer
- defined, Canada–U.S. Tax Treaty:Art. III:1(e); Canada–U.K. Tax Treaty:Art. 3:1(c)
 - includes partnership for specific purposes, 66(16), 79(1), 79.1(1), 80(1), 80.01(1), 80.02(1), 80.03(1)(a), 80.04(1), 135.2(1), 139.1(1), 160.01(1), 163.2(1), 187.4(c), 209(6), 227(5.2), (15), 237.1(1), 237.3(1), 237.4(1), 237.5(1), 251.1(4)(b), 251.2(1), 256.1(1)
 - related by blood, defined, 251(6)
- Personal credits**, 118, *see also* Tax credits
- defined, for source deductions, Reg. 100(1)
- Personal injury award**
- election re capital gains, 81(5)
 - income from exempt, 81(1)(g.1), (g.2)
- Personal or living expenses**
- allowance for, taxable, 6(1)(b)
 - defined, 248(1)

Personal or living expenses (*cont'd*)

- not deductible, 18(1)(h)

Personal property

- located on ship or aircraft used in international traffic, whether taxable Canadian property, 248(1)“taxable Canadian property”(b)(ii)

Personal services business

- defined, 125(7), 248(1)
- excluded from active business income, 125(7)“active business carried on by a corporation”
- expenses, limitation on deductibility of, 18(1)(p)
- incorporated employee, defined, 125(7)“personal services business”(a)
- loans, 12(1)(w), 80.4(1)
- rate of tax on, 123.4(1)“full rate taxable income”(a)(iii), 123.5
- retirement compensation arrangement, 207.6(3)

Personal trust, *see also* Trust (or estate)

- defined, 110.6(16), 248(1)
- • effect of qualifying disposition, 107.4(3)(i)
- disposition of capital interest in, 107(1)(a)
- distribution of property to beneficiary, 107(2), (4.1)
- emigration of beneficiary, whether deemed disposition of interest, 128.1(10)“excluded right or interest”(j)
- income interest in, defined, 108(1)
- non-arm’s length with beneficiary, 251(1)(b)
- principal residence exemption, 54“principal residence”

Personal-use property, *see also* Listed personal property

- adjusted cost base of, 46(1), (2)
- bad debt that is, 50(2)
- defined, 54
- disposition of
 - capital loss nil, 40(2)(g)(iii)
 - in part, 46(2)
- ordinarily disposed of as a set, 46(3)

Pertinent loan or indebtedness

- deemed interest income from, 17.1
- defined
 - for foreign-affiliate dumping rules, 212.3(11)
 - for shareholder-loan rules, 15(2.11)

Pertinent person or partnership

- defined, for artificial foreign tax credit generator rules, 91(4.3), Reg. 5907(1.05)

Petro-Canada, subject to tax, 27(2), Reg. 7100

Petroleum/natural gas

- allowances, Reg. Part XII
- corporations, *see* Drilling or exploration expense; Exploration and development expenses; Prospecting
- cost of substance injected to recover, 20(1)(mm)
- dealers in, limitation, 66(5)
- exploration and development expenses, 66
- exploration equipment etc., capital cost allowance, Reg. Sch. II:Cl. 10(t), Sch. II:Cl. 41
- liquefied natural gas facility, capital cost allowance, Reg. Sch. II:Cl. 47(b)
- pipeline for natural gas distribution, Reg. Sch. II:Cl. 51

Phantom stock plan

- emigration or immigration, no deemed disposition, 128.1(10)“excluded right or interest”(a)(vii)

Pharmacist

- defined, 118.4(2)

Phase (of a project)

- defined, for investment tax credit, 127(9)

Phased retirement, Reg. 8503(16)–(25)

- **Phénix case overruled**, 66.1(6)“Canadian exploration expense”(k.1), 66.2(5)“Canadian development expense”(i.1)

Photocopier

- capital cost allowance, Reg. 1101(5p), Reg. Sch. II:Cl. 10(f)

Photocopy, *see* Copy of document

Phototherapy equipment, medical expense credit, 118.2(2)(i)

Photovoltaic equipment

- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(vi), Sch. II:Cl. 43.1(d)(xiii), Sch. II:Cl. 43.2(b)

Physical activity

- defined, Reg. 9400(1)
- prescribed program, for children’s fitness credit, Reg. 9400

Physician, *see* Medical doctor

Physiotherapist

- certification of impairment
 - for disability credit, 118.3(1)(a.2)(v)

Pick-up truck

- deemed not to be automobile, 248(1)“automobile”(e)

Pilot, *see* Aircraft: pilot

Pilot plants, qualify for R&D investment tax credits, Reg. 2900(11)(c), (d)

Pinball arcade relief (COVID), Reg. 8901.1(2)(b)(ix)(A)(IV), (b)(xv), *see also* Qualifying tourism or hospitality entity

Pinball machine

- capital cost allowance, Reg. Sch. II:Cl. 16(f)

Pink Sheets quoted stocks

- qualified for deferred income plans before 2002, Reg. 4900(1)(s) [repealed]

Pipeline

- capital cost allowance, Reg. Sch. II:Cl. 1(l), Sch. II:Cl. 2(b), Sch. II:Cl. 49, Sch. II:Cl. 51
 - defined, IT-482R para.1
 - exhausted within 15 years, Reg. Sch. II:Cl. 8(i)
 - for mine, Reg. Sch. II:Cl. 10(l)
 - gas or oil well equipment, Reg. 1104(2), Reg. Sch. II:Cl. 10(j)
 - natural gas distribution, for, Reg. Sch. II:Cl. 51
 - separate classes if cost over \$10 million, Reg. 1101(5i), (5j)
 - linefill in, no CCA, Reg. 1102(1)(k)
 - post-mortem, 84(2) (Notes)
 - transmission, *see* Transmission pipeline

Pipeline operators

- taxable income earned in a province, Reg. 411

Piping, *see* Underground piping

Plan payment (for RDSP assistance payment withholding)

- defined, Reg. 103.1(1)
- withholding required, Reg. 103.1(2)

Plan trust

- defined
 - for qualified investment regulations, Reg. 4901(2)
 - for registered disability savings plan, 146.4(1)

Planning activity

- defined
 - for tax-debt avoidance penalty, 160.01(1), 163.2(1)
 - for third-party penalty, 163.2(1)

Plant residue

- defined, Reg. 1104(13)

Plant Workers Adjustment Program

- overpayments repaid, deductible, 60(n)(v)
- payments received under, taxable, 56(1)(a)(vi), Reg. 5502
 - withholding of tax at source, 153(1)(m), Reg. 5502

Plumber

- apprenticeship job creation credit, 127(9)“investment tax credit”

Plural included in singular, *Interpretation Act* s. 33(2)

Points

- allocated in determining whether film/video production qualifies as credit, Reg. 1106(5)

Poland, *see also* Foreign government

- stock exchange recognized, 262

- Poland (*cont'd*)
- universities, gifts to, Reg. Sch. VIII, s. 12
- Police officer**, *see also* Royal Canadian Mounted Police
- communication of information to by CRA, 241(4)(p)
 - high-risk overseas missions, income not taxed, 110(1)(f)(v)
 - killed in line of duty, tax-free benefit to families, 81(1)(j)
 - moneys seized from tax debtor by, 224.3
 - pension accrual to retire early, *see* Public safety occupation
 - RCMP, disability pension exempt, 81(1)(i)
 - vehicle of, deemed not to be automobile, 248(1)“automobile”(b.1)
- Policy**, *see* Insurance policy; Life insurance policy
- Policy anniversary**
- defined, Reg. 310, 1401(3)
- Policy dividend**
- on demutualization, deemed not to be, 139.1(8)
- Policy liability**
- of insurer, defined, Reg. 1408(1)
- Policy loan (life insurance)**
- amount payable in respect of, 138(12), 148(9)
 - defined, 138(12), 148(9), 211(1), Reg. 310, 1408(1)
 - interest limitation, 20(2.1), Reg. 4001
 - repayment of, 60(s)
- Policy reserves**, *see see* Insurance corporation: policy reserves
- Policy year**
- ending in taxation year, 6(4), (5)
- Political activity**
- of Canadian amateur athletic association, 149.1(6.201)
 - of charitable foundation, 149.1(6.1)
 - of charitable organization, 149.1(6.2)
- Political contribution**
- books and records, 230.1
 - eligible amount of contribution, 248(30)–(33)
 - information returns, Reg. 2001
 - not deductible, 18(1)(n)
 - receipts, Reg. 2000, 2002
 - tax credit for, 127(3)–(4.2)
 - limit on valuation of property contributed, 248(35)–(38)
- Political party**, *see also* Political contribution
- deregistration of, no tax receipt allowed while Court application pending, 127(3.3)
- Pollution control equipment**
- capital cost allowance, Reg. 1100(1)(t)
- Pollution tax**, *see* Carbon tax refunds
- Ponzi scheme**
- income tax treatment of, 9(1) (Notes), 9(2) (Notes)
- Pool amount**
- defined, for functional currency election, 261(7)(d)
- Pooled fund trust**, *see* Master trust (or Pooled fund trust)
- Pooled pension plan**, *see also* Pooled registered pension plan (PRPP)
- defined, 147.5(1), 248(1)
- Pooled RPP**, *see* Pooled registered pension plan (PRPP)
- Pooled registered pension plan (PRPP)**, 147.5
- benefit from
 - non-resident withholding tax, 212(1)(h)
 - qualifies for pension income credit, 118(7)“pension income”(a)(i), (iii.2)
 - taxable, 56(1)(z.3), 147.5(13)(a), (16), (18)
 - benefits permissible under, 147.5(5)
 - business carried on by, 147.5(8)
 - death of member, 147.5(14)–(20)
 - rollover of PRPP to survivor’s RRSP, 60(1)(v)(A.1), (B.01), (B.1)(II)1
 - deemed not to be RCA, 248(1)“retirement compensation arrangement”(a.1)
 - deemed not to be SDA, 248(1)“salary deferral arrangement”(a.1)
 - disclosure of information for administration of, 241(4)(d)(vii)
 - employer’s contribution
 - deductible, 20(1)(q), 147.5(10)
 - included in cumulative excess RRSP amount, 204.2(1.2)I(c)
 - made in error, return of permitted, 147.5(3)(d)(ii)(A)
 - taxable when returned, 147.5(13)(b)
 - no taxable benefit, 6(1)(a)(i)
 - reduces RRSP deduction room, 146(1)“unused RRSP deduction room”(b)D(iii), 146(5)(b), 146(5.1)(b)(ii)
 - excluded from various trust rules, 108(1)“trust”(a)
 - exempt income of Indians, contributions from, 147.5(31)–(34)
 - income accruing in
 - not taxed, 147.5(8), 149(1)(u.3)
 - information return, Reg. 213
 - interest on money borrowed to invest in, whether deductible, 18(1)(c)
 - not taxed, 147.5(8), 149(1)(u.3)
 - prescribed to own shares of pension investment corporations, Reg. 4802(1)(c.3)
 - RRIF may accept transfer from, 146.3(2)(f)(viii)
 - refusal to register, appeal, 172(3)(h)
 - registration conditions, 147.5(2)
 - return of contributions, 147.5(3)(d)(ii)
 - tax-free in certain cases, 56(1)(z.3)(i)
 - reversionary trust rules do not apply, 75(3)(a)
 - revocable plan, 147.5(3), (4)
 - revocation of registration
 - for non-compliance with conditions, 147.5(24)–(27)
 - voluntary, 147.5(28)
 - transfer from, to ALDA, PRPP, RPP, RRSP or RRIF, 147.5(21)
 - RPP may accept transfer, Reg. 8502(b)(iv)
 - transfer to
 - another PRPP, from, 147.5(21)(c)(ii)
 - RRIF, from, 146.3(14.1)(a)
 - withdrawal allowed to reduce Part X.1 over contribution tax, 204.2(5)
- Pornography**
- ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(viii)
 - ineligible for film/video production services credit, Reg. 9300(2)(h)
- Portfolio investment entity**
- defined, for SIFT trust definition, 122.1(1)
- Portfolio investments**
- dividends on, refundable Part IV tax, 186(1)
- Position**
- defined, for straddle-transaction rules, 18(17)
- Post**, *see* Mail
- Post-emigration loss**, 128.1(8)
- Post-1971 spousal or common-law partner trust**, *see also* Joint spousal or common-law partner trust; Trust (or estate): spouse, for
- deduction from income, 104(6)(b)B(i)
 - defined, 248(1)
 - distribution of property to person other than spouse, 107(4)(a)(i)
 - preferred beneficiary election by, 104(15)(a)
 - transfer by, to another trust, 104(5.8)
- Post-1995 life insurance policy**
- defined, Reg. 1408(1)
- Post-1995 non-cancellable or guaranteed renewable accident and sickness policy**
- defined, Reg. 1408(1)
- Post-secondary school level**
- defined, for RESP purposes, 146.1(1)

Poultry

- raising, constitutes farming, 248(1)“farming”

Poverty, vow of, 110(2)**Powerline technician**

- apprenticeship job creation credit, 127(9)“investment tax credit”

Pre-acquisition surplus

- election for dividend to come out of (return of capital), Reg. 5901(2)(b)

Pre-acquisition surplus (of foreign affiliate)

- deduction for dividend paid out of, 113(1)(d), Reg. 5900(1)(c)
- dividend received by partnership, 92(4)–(6)

Preexisting account

- defined, for Common Reporting Standard, 270(1)

Preexisting entity account

- defined, for Common Reporting Standard, 270(1)

Preexisting individual account

- defined, for Common Reporting Standard, 270(1)

Pre-funded group life insurance policy**Pre-1972 capital surplus on hand**

- amalgamation, on, 87(2)(t)
- on windup of corporation, 88(2)–(2.3)

Pre-1972 spousal trust

- deemed disposition by, 104(4)(a.1)
- defined, 108(1)

Pre-1986 capital loss balance

- defined, 111(8)
- usable, \$2,000 per year, 111(1.1)

Pre-1996 life insurance policy

- defined, Reg. 1408(1), (7)

Pre-1996 non-cancellable or guaranteed renewable accident and sickness policy

- defined, Reg. 1408(1), (7)

Pre-production mining expenditure

- Canadian exploration expense, 66.1(6)“Canadian exploration expense”(f)(v.1), (g)
- defined, 127(9)
- • reduction for assistance received, 127(11.1)(c.3)
- investment tax credit for, 127(5)(a)(i), 127(5)(a)(ii)(A), 127(9)“investment tax credit”(a.3)
- • carryforward or carryback, 127(9)“investment tax credit”(c)
- • specified percentage, 127(9)“specified percentage”(j)
- reduces CCEE, 66.1(6)“cumulative Canadian exploration expense”L

Pre-reversion debt (for functional currency rules)

- defined, 261(1)
- rules for, 261(13), (14)

Pre-transition debt (for functional currency rules)

- defined, 261(1)
- rules for, 261(8)–(10), (12)(f)

Precious metals

- eligible for RRSP, RRIF etc. investment, Reg. 4900(1)(t)
- purchase of, information return required, Reg. 230(5)

Predecessor corporation, *see* Amalgamation**Predecessor employer**

- defined, Reg. 8500(1)
- • definition applies to *Income Tax Act*, 147.2(8), Reg. 8500(1.2)
- former employee of, for pension plan rules, 147.2(8)
- pensionable service counts towards member’s benefits, Reg. 8504(2.1)

Predecessor owner

- defined, for resource allowance, Reg. 1206(1)

Preferred beneficiary

- defined, 108(1)
- election, 104(14), Reg. 2800

- • allocable amount, 104(15)
- • filing deadline, 104(14)–(14.02)

Preferred-rate amount, for credit union

- deduction based on, 137(3)
- defined, 137(4.3)

Preferred share, *see also* Short-term preferred share; Taxable preferred share; Term preferred share

- consideration for property transferred to corporation, 85(1)(g)
- deemed interest on, 258(3)
- defined, 248(1)
- issued by loss corporation
- • where dividends on not deductible, 112(2.4)–(2.9)
- tax-deferred series, Reg. 2107
- tax on payment of dividends on, 191.1
- tax on receipt of dividends on, 82(1), 187.2, 187.3
- taxable, *see* Taxable preferred share

Pregnant loss, *see also* Superficial loss

- rules preventing transfer of,
 - • capital property, 40(3.3), (3.4)
 - • depreciable property, 13(21.2)
 - • share or debt owned by financial institution, 18(13), (15)

Preliminary work activity

- defined, for oil sands mine development project, 66.1(6)
- defined, for oil sands project, Reg. 1104(2)

Premium

- defined
- • Home Buyers’ Plan, 146(1)“premium”, 146.01(1)“premium”
- • life insurance as taxable benefit, Reg. 2700(2)
- • life insurance policy, 148(9)“premium”
- • Lifelong Learning Plan, 146(1)“premium”, 146.02(1)“premium”
- • obligation owned since before 1972, ITAR 26(12)
- • registered retirement savings plan, 146(1)“premium”
- group term life insurance policy
- • limitation on deductibility, 18(9.01)
- • taxable benefit to employee, 6(4), Reg. 2700–2704
- health care insurance, deductible, 20.01
- home insurance, deduction after moving away, 62(3)(g)
- life insurance used as collateral, deductible, 20(1)(e.2)
- outstanding, *see* Outstanding premiums
- prescribed, Reg. 309(1)
- RRSP, under, 146(1)“premium”
- refund of, *see* Registered retirement savings plan: refund of premiums

Premium category

- defined, Reg. 2700(1)

Premium paid by the policyholder

- defined, Reg. 1408(4)

Prepaid amounts, taxable when received, 12(1)(a)**Prepaid expenses**

- amalgamation, 87(2)(j.2)
- farming or fishing (cash-basis) business, 28(1)(e), (e.1)
- limitation re deductibility, 18(9)

Prepaid insurance benefit

- defined, Reg. 2703
- included in taxable group term life insurance, 6(4), Reg. 2701(1)(b)

Prepaid interest

- limitations on deduction for, 18(9), 18(9.2)–(9.8)

Preproduction, *see* Pre-production mining expenditure**“Prescribed” defined**, 248(1)**Prescribed annuity contract**, Reg. 304

- amount included in income, 56(1)(d)
- deduction, 60(a)
- excluded from accrual rule, 12(11)“investment contract”, 12.2(1)(b)

Prescribed benefit

- government assistance program, excluded from income, 56(1)(a)(vi), Reg. 5502
- group term life insurance, Reg. 2700–2704
- RCA advantage rules, none, 207.5(1)“advantage”(e)
- RRSP and other registered plan advantage rules, none, 207.01(1)“advantage”(e)
- tax shelter rules, Reg. 3100

Prescribed countries

- for intercorporate dividend from foreign affiliate, Reg. 5907(11)–(11.2)
- for lower withholding tax, debt issued before 1976, Reg. 1600
- for tax treaty elections, Reg. 7400(1)
- stock exchanges recognized, 262
- treaties with, *see* list of treaties in Table of Contents

Prescribed credit rating agency, Reg. 4900(2)**Prescribed debt obligation**, *see* Debt obligation: prescribed**Prescribed distribution**

- for foreign spinoff, Reg. 5600

Prescribed donee, Reg. 3504**Prescribed durable goods, for teacher school-supplies credit**, Reg. 9600**Prescribed energy generation and conservation property**

- for Atlantic investment tax credit, 127(9)“qualified property”(b.1)

Prescribed excluded property

- defined, for RRSP etc. prohibited investment, 207.01(1)“excluded property”

Prescribed intermediate zone

- credit for residence in, 110.7(1)
- defined, Reg. 7303.1

Prescribed labour-sponsored venture capital corporation

- defined, Reg. 6701

Prescribed northern zone

- credit for residence in, 110.7(1)
- defined, Reg. 7303.1

Prescribed payment card corporation share

- defined, Reg. 9002.1(1)
- excluded from mark-to-market property rules, 142.2(1)“excluded property”(b)
- property ceasing to be, 142.6(1.4)

Prescribed plan or arrangement

- retirement compensation arrangement, Reg. 6802
- rules re, 207.6(6)

Prescribed premium

- life insurance policy, Reg. 309(1)
- RRSP recontribution, Reg. 8307(7)

Prescribed property

- tax shelter rules, Reg. 3101

Prescribed rate (of interest), Reg. Part XLIII

- “quarter” defined, Reg. 4300

Prescribed region

- of drought, flood or excessive moisture, Reg. 7305.01(1)

Prescribed securities exchange investment

- defined, Reg. 9002.2(1)
- excluded from mark-to-market property rules, 142.2(1)“excluded property”(c)
- property ceasing to be, 142.6(1.5)

Prescribed share

- for capital gains exemption, Reg. 6205
- for flow-through shares, Reg. 6202.1
- for lending assets, Reg. 6209
- for redemption of public corporation shares, Reg. 6206
- for resource expenditures, Reg. 6202
- for short-term preferred shares, Reg. 6201(8)
- for small business investment capital gain rollover, Reg. 6204
- for stock option rules, Reg. 6204

- for taxable preferred shares, Reg. 6201(7)
- for taxable RFI shares, Reg. 6201(4), (5.1)
- for term preferred shares, Reg. 6201(1)–(3), (5), (6)

Prescribed stock exchange, *see* Stock exchange**Prescribed taxable Canadian corporation**

- for film credit rules, Reg. 1106(2)

Prescribed trust, *see* Trust (or estate): prescribed**Prescribed venture capital corporation**

- defined, Reg. 6700, 6700.1, 6700.2

Prescription drugs, as medical expense, 118.2(2)(n)**President**, *see* Officer: corporation, of**Pressure pulse therapy device**

- medical expense credit, Reg. 5700(z.4)

Price adjustment clause, 85(1) (Notes)**Priest**, *see* Clergy**Primary currency (of specified debt obligation)**

- defined, Reg. 9100

Primary recovery, Reg. 1206(1)**Prince Edward Island**, *see also* Province

- Grandparents and Care Providers Program, *see* Kinship care, social assistance for
- prescribed area, for electrical energy or steam processing, 127(9)“qualified property”(c.1)
- prescribed designated region, 127(9)“specified percentage”(a)(vi), Reg. 4607
- qualified property acquired for use in, 127(9)“specified percentage”(a), (e)
- tax rates, *see* introductory pages

Principal amount (of debt obligation)

- defined, 248(1), (26)
- • distress preferred share, 80.02(2)(a)
- • obligation outstanding since before 1972, ITAR 26(1.1)

Principal-business corporation (exploration and development)

- deduction of CEE, 66.1(2)
- defined, 66(15)
- pre-production mining expenditures renounced to, 127(9)“pre-production mining expenditure”(b)
- prescribed deductions, Reg. 1213

Principal-business corporation (real property)

- associated
- • base level deduction, 18(2.3)–(2.5)
- • base level deduction, 18(2)(f), 18(2.2)
- excluded from limitation on CCA, Reg. 1100(12)

Principal residence

- capital gains exemption election, effect on, 40(2)(b)A, D, 40(7.1)
- defined, 54
- designation, 54“principal residence”(c), (c.1), Reg. 2301
- • late or amended, or revocation of, 220(3.21)(a.1)
- disposed of to spouse or spousal trust, 40(4)
- disposition after 1981, 40(6)
- distribution by spouse trust, 107(2.01)
- election where change in use, 45(3), Reg. 2300
- • where not available, 45(4)
- exception to rules, 54.1
- farmer’s, exclusion of, 40(2)(c)
- gain on disposition not taxed, 40(2)(b)
- property of trust, 40(6.1), 54“principal residence”(c.1)
- regulations, Reg. 2300, 2301
- relocation rule, 54.1
- satisfaction of interest in trust, 40(7)

Printout

- as proof of electronic document, 244(9)

Prior reference period

- defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)

Prior year revenue decline

- defined, for Canada Emergency Wage Subsidy, 125.7(1)

Priority, *see* Garnishment for taxes unpaid; Ordering**Prison**, *see also* Offences

- person confined to
- higher-income spouse can claim child-care expenses, 63(2)(b)C(i)(C)
- no GST credit, 122.5(2)(b)

Private corporation, *see also* Corporation

- Canadian-controlled, defined, 125(7), 248(1)
- capital dividend, election, 83(2), Reg. 2101
- cooperative deemed not to be, 136(1)
- credit union deemed not to be, 137(7)
- Crown corporation deemed not to be, 27(2)
- defined, 89(1), 248(1)
- special cases, 27(2), 134, 136(1), 137(7), 141(2), 141.1, 186(5), 227(16)
- deposit insurance corporation deemed not to be, 137.1(6)
- dividend paid by, 83(2)
- dividend refund to, 129
- existing since before 1972, ITAR 50
- flow-through of income to shareholders, *see* Integration
- insurance corporation deemed not to be, 141.1
- municipal or provincial corporation deemed not to be, 227(16)
- mutual fund corporation deemed to be, 131(5)
- payment of tax, 157(3)
- subject corporation, 186
- tax on certain dividends received, 186

Private foundation, *see also* Charitable foundation; Registered charity

- acquiring control of a corporation, 149.1(12)(a)
- penalty, 188.1(3)
- revocation of registration, 149.1(3)(c)
- business activities of
- penalty for carrying on any business, 188.1(1)(a), 188.1(2)(a)
- revocation for carrying on any business, 149.1(4)(a)
- defined, 149.1(1), 248(1)
- designation of, as public, 149.1(13)
- designation of registered charity as, 149.1(6.3)
- disbursement quota, 149.1(20)
- excess holdings regime, 149.1(1)“divestment obligation percentage”, (4.1)(c), 188.1(3.1)–(3.5)
- excluded from reversionary trust rules, 75(3)(b)
- non-qualified investment, *see* Non-qualified investment: private foundation
- registration of, *see* Registered charity

Private health services plan, *see also* Employee life and health trust

- defined, 248(1)
- employee contributions to employee life and health trust deemed to be contributions to PHSP if identified as such, 144.1(10)
- employer’s contribution not a taxable benefit, 6(1)(a)(i)
- premiums
- deductible from business income, 20.01
- reduction in partnership interest, 53(2)(c)(xii)
- medical expense credit, 118.2(2)(q)

Private holding corporation, defined, 191(1)**Privatization of government assets**

- debt qualifies for investment by deferred income plans, Reg. 4900(1)(q)

Privileged documents, *see* Solicitor-client privilege**Prize**

- achievement, for
- included in income, 56(1)(n)
- lottery, not taxed (no taxing provision)
- prescribed, Reg. 7700

- not included in income, 56(1)(n)
- property acquired as, cost of, 52(4)

Pro rata portion

- defined
- for mutual fund corporation, TCP gains, 131(6)
- for mutual fund trust, TCP gains, 132(4)

Probate fees

- avoidance of, 248(1)“alter ego trust”

Procedure and evidence, 244**Procedures not followed by CRA**

- assessment still valid, 166

Proceeds of disposition, *see also* Proceeds of the disposition

- allocation of
- between land and buildings, 13(21.1), 70(5)(d)
- between property and services, 68
- capital property, 54“proceeds of disposition”
- deemed
- amalgamation, on, 69(13)
- disposition of share, on, 55(2)–(5)
- disposition to trust with no change in beneficial ownership, 69(1)(b)(iii)
- former business property, 44(6)
- property surrendered to creditor, 79(3)
- when deemed payable, 14(2) [before 2017]
- defined
- capital property, 54
- depreciable property, 13(21)
- for resource allowance, Reg. 1206(1)
- depreciable property, 13(21)“proceeds of disposition”
- due after year
- amalgamation, 87(2)(m)
- income interest in trust, 106(3)
- life insurance policy, interest in, 56(1)(j), 148(9)“proceeds of the disposition”
- life insurance policy dividends deemed to be, 148(2)
- timber resource property, 20(5.1)
- unclaimed at year-end
- withholding tax, 153(4)
- effect of remittance, 153(5)
- uncollectible portion, 20(4)–(4.2)
- unrealized, 40(1)(a)(iii)

Proceeds of the disposition, *see also* Proceeds of disposition

- defined, Reg. 310

Processing, *see also* Manufacturing or processing

- allowances, Reg. Part XII
- defined, for mining tax deduction, Reg. 3900(1)
- field, *see* Canadian field processing

Processing property

- defined, Reg. 1206(1)

Producer gas

- defined, for CCA, Reg. 1104(13)
- equipment for generating, Reg. Sch. II:Cl. 43.1(d)(xvi)
- equipment for generating energy from, Reg. Sch. II:Cl. 43.1(c)(i)(A), Sch. II:Cl. 43.1(d)(ix)

Producer (of film or video production)

- defined, Reg. 1106(1)“producer”

Producer organization or association

- farm support payment, information return, Reg. 234–236

Production

- resource property, from, defined, 66(15)“production”
- right to receive, *see* Right to receive production

Production commencement time

- defined, for Canadian film tax credit, 125.4(1), (1.1)

Production or use

- payments dependent on
- deemed income, 12(1)(g)
- interest paid to non-resident, 212(1)(b) (closing words)

Production tax amount

- defined
- for FAPI, Reg. 5910(4)
- for foreign tax credit, 126(7)

Professional athlete

- defined, 143.1(1)

Professional corporation, see also Professional practice

- defined, 248(1)
- fiscal period of, 249.1(1)(b)(iii)

Professional membership dues

- employee's, deduction, 8(1)(i)(i)
- examination fees to qualify, tuition credit, 118.5(1)(d)
- professions board, deductible, 8(1)(i)(vii)

Professional partnership

- defined, 40(3.111)
- where ACB of partnership interest is less than zero, 40(3.11)A(b), B(c)

Professional practice

- carried on since before 1972, ITAR 23(3)
- examination fees to qualify, tuition credit, 118.5(1)(d)
- incorporated, *see* Professional corporation
- judge's income from, 24.1 [repealed]
- partnership for, *see* Professional partnership
- privileged information, 232(2)
- work in progress of
 - deemed to be inventory, 10(5)(a)
 - election to exclude from income until 2017, 34
 - transitional rule 2017–2020, 10(14.1)
 - valuation of, 10(4)(a)

Professions board

- dues to, deductible, 8(1)(i)(vii)

Professor

- exemption for travel expenses, 81(3.1)(a)(ii)

Profit, see also Income

- from business or property, income, 3(a), 9(1)
- payment based on future, 12(1)(g)
- reasonable expectation required, 18(1)(h), 248(1)“personal or living expenses”

Profit participation payments

- not deductible as financing expenses, 20(1)(e)(iv.1)

Profit sharing plan, see also Deferred profit sharing plan; Employees profit sharing plan

- appeal from refusal to register, 172(3)(c), 180
- defined, 147(1), 248(1)
- employer's contribution under, 20(1)(w)
 - limitation on deductibility, 18(1)(k)
- information return, Reg. 212
- registration of, as DPSP, 147(2)
- refusal by Minister
 - deemed, 172(4)(b)
- regulations, Reg. Part XV

Profits, see Profit**Program for Older Worker Adjustment, see Older Worker Adjustment, Program for****Prohibited investment**

- for employee life and health trust
 - defined, 207.9(1)
 - tax on, 207.9(2)
- for qualifying environmental trust
 - defined, 211.6(1)
- for RCA
 - becoming or ceasing to be, deemed disposition and reacquisition, 207.61(4)
 - defined, 207.5(1)
 - limitation on RCA election, 207.5(3)
 - tax on, 207.61
- for RRSP, RRF, TFSA, RESP or RDSP

- benefit attributable to, constitutes advantage, 207.01(1)“advantage”(c)(ii)
- defined, 207.01(1)
- investment becoming or ceasing to be, 207.01(6)
- tax on, 207.04(1), (2), (6), (7)
 - waiver of tax, 207.06(2)
- for registered pension plan, Reg. 8514

Project phase, see Phase (of a project)**Prolonged**

- defined, for disability credit, 118.4(1)(a)

Promissory note

- conversion to other bond, debenture or note, 51.1
- issued on rollover of property to corporation, 85(1)(b)
- provided as payment, 76(1)

Promoter

- for non-resident trust rules
 - defined, 94(1)
- of education savings plan
 - defined, 146.1(1)“education savings plan”(b)
- of non-resident investment or pension fund
 - defined, 115.2(1)
- of notifiable transaction
 - defined, 237.3(1), 237.4(1)
- of reportable transaction
 - defined, 237.3(1)
- of tax shelter
 - defined, 149.1(1), 237.1(1)
 - obligation to provide and use identification number, 237.1(5)

Promotion expenses, see Advertising**Proof**

- burden of, *see* Burden of proof
- documents, of, 244(9), (13)
 - rebuttable, *Interpretation Act* s. 25(1)
- electronically filed return, 244(21)
- failure to comply, of, 244(7), (8)
- no appeal, of, 244(10)
- not required re signature of CRA officer, 244(11)
- return, etc., of, 244(17)–(19)
- service, of, 244(6)
 - by mail, 244(5)
- time of compliance, of, 244(8)

Property, see also Goods

- acquired
 - as prize, 52(4)
 - by bequest etc., 70(6)
 - by gift, 69(1)(c)
 - by insurer, on default in payment, 138(11.93)
 - from spouse, deemed value of, 73
 - in the year, capital cost allowance, Reg. 1100(2)–(2.4)
 - non-arm's length exception, Reg. 1102(20)
 - to earn income from business, expenses deductible, 20(1)(e)(ii.1), 20(1)(e.1)(ii)
- adjusted cost base
 - amounts added, 53(1)
 - amounts deducted, 53(2)
 - defined, 54
 - identical properties, 47
 - negative amount, deemed gain, 40(3), (3.1)
- amortized cost, ITAR 26(12)“capital property”
- and casualty surplus, *see* Property and casualty surplus (of insurer)
- annual value of, not deductible, 18(1)(d)
- appropriation of, to shareholder or prospective shareholder, 15(1), (7)
- beneficial owner of, defined re Quebec, 248(3)
- Canadian resource property, defined, 66(15)
- capital gains and losses, *see* Capital gains and losses

Property (*cont'd*)

- “capital property” defined, 54; ITAR 26(12)“capital property”
 - “certified”
 - ascertainment of, 127(10)(a), (b)
 - change in use of, 13(7), 45
 - election, 45(2)
 - insurer, by, 138(11.3)–(11.41), (11.6)
 - principal residence, election, 45(3)
 - where not available, 45(4)
 - convertible, *see* Convertible property
 - cost amount, defined, 248(1)
 - cultural, *see* Cultural property
 - deceased taxpayer, of, 164(6)
 - deemed acquisition of
 - becoming non-resident, 128.1(4)(c)
 - becoming resident in Canada, 128.1(1)(c)
 - capital cost allowance rules, Reg. 1100(2.21)
 - change in use, on, 45
 - deemed disposition of
 - becoming non-resident, 128.1(4)(b)
 - becoming resident in Canada, 128.1(1)(b)
 - capital cost allowance rules, Reg. 1100(2.21)
 - change in use, on, 45
 - death, on, 70(5)–(10)
 - deemed gain from
 - added to cost base, 53(1)(a)
 - defined, 248(1)
 - depreciable, *see* Depreciable property
 - disposed of
 - by legal representative, Reg. 1000
 - in part, 43, 46
 - on death, definitions, 70(10)
 - disposition of, *see* Disposition
 - exchanges of, 13(4), 44
 - replacement property, 44(5)
 - “excluded” of non-resident, 116(6)
 - farm, *see* Farm property
 - foreign, deferred income plans, Reg. Part L
 - former, capital gain, 44(6)
 - goodwill, ITAR 21
 - government assistance in acquiring
 - cost base, deductions from, 53(2)(k)
 - having more than one use, 45
 - identical, 47; ITAR 26(8)–(8.2)
 - defined, 248(12)
 - life insurance corporation, of, 138(11.1)
 - income from, 9(3), 12
 - defined, 9(1)
 - for dividend refund, 129(4)“income” or “loss”
 - for FAPI purposes, 95(1)
 - inter vivos gift of, 69(1)(b)
 - involuntary disposition of, 13(4)
 - leased
 - buildings on, capital cost allowance, Reg. 1102(5)
 - improvements, capital cost allowance, Reg. 1102(4)
 - leasing, capital cost allowance, Reg. 1100(15)–(20)
 - non-arm’s length exception, Reg. 1102(20)
 - separate classes, Reg. 1101(5c)
 - listed personal, *see* Listed personal property
 - losses, *see* Non-capital loss; Loss(es)
 - lost, destroyed or taken
 - amalgamation, effects of, 87(2)(1.3)
 - misclassified, 13(6)
 - non-depreciable capital
 - change of control, 53(2)(b.2)
 - “nothings”, ITAR 21
 - owned on Dec. 31/71, ITAR 20(1)
 - part disposition of
 - cost base, deduction from, 53(2)(d)
 - principal residence, *see* Principal residence
 - proceeds of disposition of
 - allocation of, between land and buildings, 13(21.1)
 - defined, 54
 - production from or use of, *see* Production or use
 - publicly traded securities, ITAR 26(11)
 - qualified (investment tax credit), Reg. 4600
 - defined, 127(9), (11)
 - reacquired, ITAR 26(6)
 - real, disposition of by non-resident, 216(5)
 - received as consideration for payment or loan
 - cost base, deductions from, 53(2)(f)
 - rental, capital cost allowance, Reg. 1100(11)–(14.2)
 - replacement, 13(4), (4.1), 14(7) [before 2017], 44(5)
 - repossessed, rules applicable, 79
 - resource, *see* Resource property
 - restricted, *see* Restricted property (for non-resident trust rules)
 - seizure of, by creditor, 79.1
 - small business, Reg. Part LI
 - substituted
 - cost base, addition to, 53(1)(f)
 - meaning of, 248(5)
 - surrender of, to creditor, 79
 - tax, *see* Municipality: property taxes
 - timber resource, defined, 13(21)
 - transfer of, *see* Transfer of property
 - trust, proportional holdings in, 259
 - upkeep by trust for beneficiary, 105(2)
 - use of or production from, *see* Production or use
 - value at date of death, 70(5), (6)
- Property and casualty surplus (of insurer)**
- defined, insurers, Reg. 2400(1)
- Property taxes**
- deductible after moving away from home, 62(3)(g)
 - limitation on deduction as business expense, 18(2)
- Proprietor of business**
- disposing of business, 25
 - fiscal period, 25
 - income from business, 11(1)
 - return on death of, 150(4)
- Proprietorship**
- continuing business of partnership, 98(5)
- Prosecution**
- indictment, upon, 239(2)
 - limitation, 244(4)
- Prospecting**
- amount re share received, excluded from income, 81(1)(l)
 - income from, 35
 - exemption, 35(1)(c), 81(1)(l)
- Prospector**
- defined, 35(2)
 - receipt of shares by, 35
 - deduction from amount, 110(1)(d.2)
- Protective trust**
- excluded from qualifying disposition, 107.4(1)(e)
- Protector (of trust)**
- reported to CRA starting 2022, Reg. 204.2(1)(a)
- Province, *see also* specific provinces by name**
- assessment re allocation of provincial income, extension of time for federal reassessment, 152(4)(d)
 - bonds issued by
 - interest paid to non-resident, 212(1)(b)(ii)(C)(II), 212(6)–(8)
 - bound
 - by garnishment orders, 224(1.4)
 - by withholding tax requirements, 227(11)
 - capital tax of, deductibility, 18

Province (*cont'd*)

- communication of information to, 241(4)(d), (j.2)
- corporation incorporated in before part of Canada, 248(1)“corporation incorporated in Canada”
- corporation owned by, *see also* Crown corporation
- bonds issued by
 - interest paid to non-resident, 212(1)(b)(ii)(C)(IV)
 - deemed not private corporation, 227(16)
 - exemption, 149(1)(d)–(d.4)
- defined, *Interpretation Act* s. 35(1)
- for corporate tax rate, 124(4)
- for provincial SIFT tax factor, Reg. 414(1)
- exempt from federal tax, *Constitution Act 1867*, s. 125
- gift to, 118.1(1)
- government of, *see* Government
- includes Newfoundland and Labrador and Nova Scotia offshore areas, 124(4)“province”
- income earned in
 - deduction from tax, re schooling allowance, 120(2)
 - defined, 120(4)
 - individual, by, Reg. Part XXVI
- income not earned in
 - addition to tax for, 120(1)
- labour-sponsored venture capital corporation of
 - recovery of LSVCC credit, 211.7
- laws of
 - property transfer to spouse on death, 248(23.1)
 - support order transfers, 73(1), (1.1)
- legislature, *see* Legislative assembly (or Legislature)
- logging tax paid to, credit for, 127(1), (2), Reg. 700
- pension legislation, registration under, 147.1(2)(a)(iii)
- portion of income tax
 - refund by Minister, 164(1.4)
- refund of tax of, to be paid by CRA, 164(1.4)
- student loan legislation, interest paid under, credit, 118.62
- subject to withholding tax provisions, 227(11)
- super-R&D allowance, federal benefit, 127(9)“super-allowance benefit amount”, 127(10.1)(b)
- tax collection agreement, application of payments, 228
- tax transfer payments to, 154, Reg. 3300

Provincial

- defined, *Interpretation Act* 33(3), 35(1)“province”

Provincial indemnities

- excluded from income, 81(1)(q)

Provincial laws, prescribed, Reg. 6500–6502**Provincial life insurance corporation**

- conversion into mutual corporation, 139

Provincial pension plan, *see also* Specified pension plan

- assignment of pension under, attribution rules do not apply, 56(2), (4), 74.1(1)
- benefits taxable, 56(1)(a)(i)
- prescribed, *see* Specified pension plan
- Saskatchewan, *see* Specified pension plan

Provincial reassessment

- defined, 152(4)(d)
- extension of time for federal reassessment, 152(4)(d)

Provincial SIFT tax rate

- defined, 248(1), Reg. 414(3)
- used in calculation of tax payable
 - by partnership, 197(2)C
 - by trust, 122(1)(b)A:D, 122(3)“taxable SIFT trust distributions”C

Provision

- defined, ITAR 74

Provisionable assets

- defined, Reg. 8006

Provisional past service pension adjustment (PSPA)

- defined, Reg. 8303(2), (3)

Proxy amount

- prescribed, for research and development expenses, Reg. 2900(4)–(10)
- reduction in, 127(11.1)(f) [repealed], 127(18)

Psychologist

- certification of impairment
 - for disability credit, 118.3(1)(a.2)(iv)
- defined, 118.4(2)
- therapy qualifying for medical expense credit, 118.2(2)(1.9)

Public authority

- tax on disposition of cultural property, 207.3

Public body

- performing function of government
 - corporation owned by
 - exempt from tax, 149(1)(d.5)
 - exclusion, 149(1.3)
 - income test, 149(1.2)
 - donation to, 149.1(1)“qualified donee”(a)(iii)
 - by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
- exempt from tax, 149(1)(c)

Public corporation

- amalgamation, 87(2)(ii)
- defined, 89(1), 248(1)
- election to trigger gain before corporation becomes, 48.1
- existing since before 1972, ITAR 50
- life insurance corporation deemed to be, 141(2)
- mortgage investment corporation, 130.1(5)
- shares of, donation to charity, 38(a.1)
- partnership interests exchangeable for, 38(a.3)

Public employees

- annual dues deductible, 8(1)(i)(iv)

Public foundation, *see also* Charitable foundation; Registered charity

- acquiring control of a corporation, 149.1(12)(a)
- penalty, 188.1(3)
- revocation of registration, 149.1(3)(c)
- business activities of unrelated business
 - penalty, 188.1(1)(b), 188.1(2)(b)
- revocation of registration, 149.1(3)(a)
- defined, 149.1(1), 248(1)
- designation of registered charity as, 149.1(6.3)
- private foundation designated as, 149.1(13)
- registration of, *see* Registered charity

Public health restriction

- defined, for COVID-19 Canada Emergency Rent Subsidy, 125.7(1)
- partial, *see* Partial public health restriction

Public institution

- defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)

Public investment partnership

- defined, Reg. 229.1(1)
- requirement to publicize income information, Reg. 229.1(2), (3)(b)

Public investment trust

- defined, Reg. 204.1(1)
- requirement to publicize income information, Reg. 204.1(2), (3)(b)

Public market

- defined, for SIFT trust and partnership distributions, 122.1(1), 248(1)

Public partnership, *see also* SIFT partnership

- defined, Reg. 229.1(1)

- Public partnership (*cont'd*)
- requirement to publicize income information, Reg. 229.1(2), (3)
- Public pension benefits**
- defined, Reg. 8500(1)
- Public policy dialogue**
- charity may engage in, 149.1(1)“charitable activities”, 149.1(10.1)
- Public primary caregiver**
- defined, 146.1(1)
- Public safety occupation**, *see also* Firefighter; Police officer
- defined, Reg. 8500(1)
 - early retirement permitted, Reg. 8503(3)(c)(i)
 - higher pension accrual rate permitted, Reg. 8503(3)(g)(i)
- Public school board**, *see* School board
- Public Sector Pension Investment Board**
- prescribed to own shares of pension investment corporations, Reg. 4802(1)(c.2)
- Public Transit Pass Credit**, 118.02 [pre-2018]
- Public trust**, *see also* SIFT trust
- defined, Reg. 204.1(1)
 - requirement to publicize income information, Reg. 204.1(2), (3)
- Public utility**
- foreign
 - dividend from, paid to non-resident, 213
 - income imputed to shareholder of corporation, 213(2)
- Publicly accessible charity information**
- defined, 241(10)
- Publicly traded**
- defined, Reg. 230(1)
- Publicly traded liability**
- defined, for SIFT trust definition, 122.1(1)
- Publicly-traded securities**
- donation of, to charity, zero capital gain, 38(a.1)
 - partnership interests exchangeable for, 38(a.3)
 - prescribed, for 1971 valuation day, Reg. 4400
 - value on Valuation Day, ITAR 26(11), Reg. Sch. VII
- Puck**, *see* Paid-up capital
- Pulp and paper byproduct**
- defined, Reg. 1104(13)
 - gas produced by, Reg. 1104(13)“biogas”
- Pulp and paper waste**
- defined, Reg. 1104(13)
 - included in eligible waste fuel, Reg. 1104(13)“eligible waste fuel”
- Pumping equipment**
- capital cost allowance, Reg. Sch. II:Cl. 7(j), (k)
- Punishment**, *see* Offences
- Purchase butterfly**, 55(1), (3.1), (3.2)
- Purchaser shares**
- defined, 85.1(2.2)
- Purifier**
- air or water, medical expense credit, Reg. 5700(c.1)
- Purpose**
- gaining or producing income, 18(1)(a), Reg. 1102(1)(c)
- “Put-in-use” rules**, *see* Available-for-use rules
- Q**
- QCJO**, *see* Qualified Canadian journalism organization
- QDT**, *see* Qualified disability trust
- QET income tax rate**
- defined, 211.6(1)
- QFFP taxable capital gain**
- defined, 104(21.21)
- QFM**, *see* Qualifying family member
- QLAD**, *see* Qualifying liquidation and dissolution
- QPIP**, *see* Quebec Parental Insurance Plan
- QPP**, *see* Canada Pension Plan/Quebec Pension Plan
- QR**, *see* Qualifying renter
- QRE**, *see* Qualifying rent expense
- QSBC**, *see* Qualified small business corporation
- QST**, *see* Quebec sales tax
- QTHE**, *see* Qualifying tourism or hospitality entity
- QTI**, *see* Qualifying transitional income
- Quadrennial survey, reserve for**
- defined, 12(1)(h), 20(1)(o), Reg. 3600(2)
- Qualified activities**
- defined, Reg. 5202
- Qualified annuity**
- defined, Reg. 1408(1)
- Qualified Canadian journalism organization**, *see also* Qualifying journalism organization; Registered journalism organization
- defined, 149.1(1)
 - designation as, 248(1)“qualified Canadian journalism organization”
 - effective date of designation, 168.1(1)
 - revocation of designation, 168.1(2), (3)
- Qualified Canadian labour expenditure**
- defined, for film/video production services credit, 125.5(1)
- Qualified construction equipment [repealed]**
- defined, 127(9)
- Qualified corporation (re Canadian film/video tax credit)**
- defined, 125.4(1)
- Qualified credit card issuer**
- defined, for Common Reporting Standard, 270(1)
- Qualified dependant**
- Canada Child Benefit
 - credit in respect of, 122.61(1)
 - defined, 122.6, 122.62, Reg. 6300–6302
 - Climate Action Incentive
 - credit in respect of, 122.8(4)D
 - defined, 122.8(1)
 - GST credit
 - credit in respect of, 122.5(3)A(c), (d)
 - defined, 122.5(1), 122.5(2)
- Qualified disability trust**
- ceasing to be, recovery of tax saved, 122(1)(c), 122(2)
 - defined, 122(3)
 - graduated tax brackets apply, 117(2), 122(1)
 - principal residence exemption, 54“principal residence”(c.1)(iii.1)(B)
- Qualified dividend**
- defined, 112(6.1)
 - stop-loss rules, 112(3.01)–(4.22)
- Qualified domestic trust**
- relief from double taxation, Canada-U.S. Tax Treaty:Art. XXVI:3(g)
- Qualified donee**, *see also* Charity; Registered charity
- books and records, requirement to keep, 230(2)
 - charity can transfer funds to, 149.1(2)(b), (c), 149.1(3)(b), (b.1), 149.1(4)(b), (b.1)
 - corporation granting option to, no donations deduction allowed, 110.1(10)–(13)
 - defined, 118.1(1), 149.1(1), 248(1)
 - donations to
 - by corporation, deduction, 110.0(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
 - option granted to, 110.1(10)–(13), 118.1(21)–(24)
 - revocation of registration, 149.1(4.3), 168(1)

- Qualified donee (*cont'd*)
 - suspension of receipting privileges, 188.2(2)
- Qualified expenditure**
 - pool, *see* SR&ED qualified expenditure pool
 - reduction to reflect government assistance, 127(18)–(21)
 - revocation of registration, 149.1(4.3), 168(1)
 - scientific research, for, defined, 127(9)“qualified expenditure”
 - suspension of receipting privileges, 188.2(2)
- Qualified farm or fishing property**
 - capital gains deduction, 110.6(2)
 - defined, 110.6(1)
 - • deemed, where capital gain deemed following debt forgiveness, 80.03(8)
- Qualified insurance corporation**
 - defined, Reg. 810(2)
 - property of, no certificate required before disposition, Reg. 810(1)(a)
- Qualified investment**, *see also* Non-qualified investment
 - deferred profit sharing plans, 204“qualified investment”
 - information returns, Reg. 221
 - non-resident investment or pension fund
 - • defined, 115.2(1)
 - registered disability savings plan, 146.4(1), Reg. 4900
 - • tax on investment that is not, 207.04
 - registered education savings plan, 146.1(1)“qualified investment”, Reg. 4900
 - • tax on acquiring non-QI, 207.04
 - • tax on holding non-QI before 2017, 207.1(3)
 - registered retirement income fund, 146.3(1)“qualified investment”, Reg. 4900
 - • tax on investment that is not, 146.3(9), 207.04
 - registered retirement savings plan, 146(1)“qualified investment”, Reg. 4900
 - • tax on investment that is not, 146(10.1), 207.04
 - tax-free savings account (TFSA)
 - • defined, 207.01(1)
 - • obligation of issuer, 207.01(5)
 - • tax on investment that is not, 207.04
- Qualified labour expenditure (re Canadian film/video tax credit)**
 - defined, 125.4(1)
- Qualified non-resident**
 - defined, 115.2(1)
- Qualified pension income**
 - defined, 60.03(1), 118(7)
 - pension credit, 118(3)B(b)
- Qualified property**
 - defined
 - • investment tax credit, 127(9), (11)
- Qualified REIT property**
 - defined, for SIFT trust and partnership distributions, 122.1(1)
- Qualified related corporation**
 - branch tax, 219(8)
 - non-resident insurer, of, 138(12)“qualified related corporation”
- Qualified relation**
 - Climate Action Incentive
 - • defined, 122.8(1)
 - GST credit
 - • credit in respect of, 122.5(3)A(b)
 - • defined, 122.5(1), 122.5(2)
- Qualified resource**
 - defined, for resource allowance claims, Reg. 1206(1)
- Qualified resource expense**
 - defined (for corporate inclusion of partnership income), 34.2(1)
- Qualified resource property**
 - defined, for Atlantic investment tax credit, 127(9)
 - excluded from qualified property, 127(9)“qualified property”
 - investment tax credit for, 127(9)“investment tax credit”(a)
- Qualified security**
 - defined, 260(1)
 - loan of, deemed dividend, 260(5.1)
- Qualified small business corporation**
 - capital gains exemption, *see* Qualified small business corporation share
 - share, *see* Qualified small business corporation share
- Qualified small business corporation share**
 - capital gains deduction, 110.6(2.1)
 - death of shareholder, 110.6(14)(g)
 - defined, 110.6(1)
 - • deemed, where capital gain deemed following debt forgiveness, 80.03(8)
 - individual, of, defined, 108(1)“qualified small business corporation share”
 - related person, 110.6(14)
 - rules re, 110.6(14)
- Qualified small-business property**
 - defined, 127(9) [repealed]
 - investment tax credit for, 127(9)“specified percentage”(i)
- Qualified small business share**
 - excluded from mark-to-market rules, 142.2(1)“mark-to-market property”(e)
- Qualified tertiary oil recovery project, defined**, Reg. 1206(1)
- Qualified transportation equipment [repealed]**
 - defined, 127(9)
- Qualified trust**
 - defined, 259(3)
- Qualified trust unit**
 - defined, 260(1)
- Qualified zero-emission technology manufacturing activities**
 - credit for, 125.2(2)
 - defined, Reg. 5202
- Qualifying acquisition**
 - defined, for stock option deferral, 7(9)
- Qualifying active business**
 - defined, Reg. 5100(1)
- Qualifying amount**
 - defined, for retroactive spreading of lump-sum payments, 110.2(1)
- Qualifying annuity**
 - defined, for pooled registered pension plan rules, 147.5(1)
- Qualifying arrangement**
 - deemed to be trust in Quebec, 248(3)(b), (c)
 - defined
 - • for Quebec *Civil Code* usufruct rules, 248(3.2)
 - • for TFSA, 146.2(1)
 - • overcontributions to deferred plans, 204.2(1.32)
- Qualifying Canadian partnership**
 - defined, 15(2.14)(a)
 - exception to shareholder loan rules, 15(2.11)
- Qualifying competent authority agreement**
 - defined, for country-by-country reporting, 233.8(1)
- Qualifying contract**
 - for qualifying environmental trust, defined, 211.6(1)
- Qualifying corporation**
 - defined
 - • for air quality improvement credit, 127.43(1)
 - • for refundable investment tax credit, 127.1(2)
- Qualifying cost**
 - defined, for small business investment capital gain rollover, 44.1(1)
- Qualifying cost contribution arrangement**
 - defined, 247(1)

Qualifying currency

- defined, for functional currency rules, 261(1)

Qualifying debt obligation [no longer current]

- defined
- for small business bond, 15.2(3)
- for small business development bond, 15.1(3)

Qualifying disbursement

- defined, 149.1(1)
- permitted to registered charity, 149.1(1)“charitable organization”(a.1), 149.1(1)“charitable purposes”, 149.1(2)(b), (c), (3)(b), (b.1), (4)(b), (b.1), (4.1)(d), (21)

Qualifying disposition

- small business investment capital gain rollover
- defined, 44.1(1), (9)
- trusts
- defined, 107.4(1)
- rollover to trust, 107.4(3)
- subsequent disposition by trust, 107.4(4)

Qualifying dividend, 83(1), (6)**Qualifying educational program**

- defined
- for scholarships and pre-2017 education tax credit, 118.6(1)
- for Lifelong Learning Plan withholding exemption, Reg. 104.1(2)
- for Lifelong Learning program (loan from RRSP), 146.02(1)
- for RESP, 146.1(1)

Qualifying entity

- defined
- COVID-19 Canada Emergency Wage Subsidy, 125.7(1)
- foreign retirement plan, contribution to, Reg. 6804(1)
- upstream loan repaid by Aug. 2016, transitional setoff, 39(2.2)

Qualifying environmental trust (formerly Mining reclamation trust)

- acquisition of, deduction, 20(1)(tt)
- amalgamation of corporation, effect of, 87(2)(j.93)
- beneficiary, credit to, 127.41
- reduction in corporate beneficiary’s instalments, 157(3)(e)
- contribution to, deduction, 20(1)(ss)
- cost amount of interest in, 248(1)“cost amount”(e.2)
- defined, 211.6(1), 248(1)
- disposition of interest in, income, 12(1)(z.2)
- income from, 12(1)(z.1)
- tax on, 211.6

Qualifying exchange (LSVCC)

- defined, 211.7(1)
- disposition of approved share, 211.8(1)
- exchangeable shares, 211.7(3)

Qualifying exchange (mutual fund rollover)

- defined, 132.2(2)
- effect of, 132.2(1)
- exemption from rules re disposition of income interest in trust, 106(2), (3)

Qualifying expenditure

- for air quality improvement credit
- defined, 127.43(1)
- for home accessibility tax credit
- defined, 118.041(1)
- made by condominium corporation, co-op or trust, 118.041(2)

Qualifying family member

- defined, for RDSP, 146.4(1)

Qualifying foreign merger

- defined, for foreign banks, 142.7(1)
- effect of, 142.7(2)

Qualifying group plan amount [formerly “qualifying group RRSP premium”]

- defined, 204.2(1.31)

Qualifying home

- for First-Time Home Buyer’s Credit and Disability Home Purchase Credit, 118.05(1)
- for RRSP withdrawals, 146.01(1)

Qualifying homebuyer

- defined, Reg. 104(3.01)

Qualifying income limit

- defined, for refundable ITC, 127.1(2)

Qualifying incomes

- defined, for foreign tax credit, 126(7), (9)

Qualifying indebtedness

- defined, for FAPI of banks, 95(2.43)

Qualifying individual

- defined
- for home accessibility tax credit, 118.041(1)
- for pension regulations (re approved downsizing program), Reg. 8505(2)(b), 8505(2.1)

Qualifying interest (in respect of foreign affiliate)

- defined, 95(2)(m), 95(2.2)
- income of foreign affiliate from active business, 95(2)(a)

Qualifying journalism organization. *see also* Qualified Canadian journalism organization; Registered journalism organization

- defined
- for donations and charity treatment, 149.1(1)
- for refundable labour tax credit, 125.6(1)

Qualifying labour expenditure

- defined, for journalism labour credit, 125.6(1)

Qualifying law

- in respect of qualifying environmental trust, defined, 211.6(1)

Qualifying liquidation and dissolution

- defined, 88(3.1)
- excluded from pregnant-loss rules, 13(21.2)(e)(iii)(E)(I)1, 14(12)(g)(i)(A) [before 2017], 18(15)(b)(iv)(A)(I), 40(3.4)(b)(v)(A)(I), 40(3.5)(c)(iii)

Qualifying location

- defined, for air quality improvement credit, 127.43(1)

Qualifying losses

- defined, for foreign tax credit, 126(7), (9)

Qualifying member

- defined, FAPI rules, 95(2)(o)–(r), 248(1)

Qualifying non-resident employee

- defined, for payroll withholding exemption, 153(6)

Qualifying non-resident employer

- defined, for payroll withholding exemption, 153(6)
- exemption from withholding on payment to qualifying non-resident employee, 153(1)(a)(ii)

Qualifying obligation

- defined, Reg. 5100(1)

Qualifying owner

- defined, 149(1)(d.6)

Qualifying partial public health restriction

- Canada Emergency Recovery Benefit (CERB) adjustment, Reg. 8901.2(2)(b)(ii)
- defined, Reg. 8901.2(0.1)

Qualifying partnership

- defined (for corporate inclusion of partnership income shortfall), 34.3(1)

Qualifying payment

- defined, Reg. 809(4)

Qualifying performance income (for amateur athlete trust)

- defined, 143.1(1)
- included in RRSP earned income, 146(1)“earned income”(b.2)

Qualifying period

- defined
- for air quality improvement credit, 127.43(1)
- for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)
- for phased retirement rules, Reg. 8503(16)
- for SIFT trust wind-up event, 248(1)“SIFT trust wind-up event”(c)(ii)

Qualifying person

- defined
- re eligible funeral arrangement, 148.1(1)
- re registered disability savings plan, 146.4(1)
- re stock option rules, 7(7)
- re treaty shopping, Canada-U.S. Tax Treaty:Art. XXIX-A:2

Qualifying portion of a capital gain

- defined, for small business investment capital gain rollover, 44.1(1)

Qualifying portion of a distribution

- defined, 207.01(1)“excess TFSA amount”E

Qualifying portion of the proceeds of disposition

- defined, for small business investment capital gain rollover, 44.1(1)

Qualifying property

- defined, for COVID-19 Canada Emergency Rent Subsidy, 125.7(1)

Qualifying public health restriction

- defined, for Canada Emergency Wage Subsidy, 125.7(1)

Qualifying recovery entity

- defined, for Canada Recovery Hiring Program, 125.7(1)

Qualifying renovation

- defined
- for home accessibility tax credit, 118.041(1)

Qualifying rent expense

- defined, for COVID-19 Canada Emergency Rent Subsidy, 125.7(1)

Qualifying renter

- defined, for COVID-19 Canada Emergency Rent Subsidy, 125.7(1)

Qualifying retirement plan

- defined, Canada-U.S. Tax Treaty:Art. XVIII:15
- tax treatment of, Canada-U.S. Tax Treaty:Art. XVIII:8–17

Qualifying return of capital

- defined, for upstream loans, 90(3)
- reduction of ACB, 53(2)(b)(i)(B)(II)

Qualifying revenue

- defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)

Qualifying services

- benefits in respect of, 94(1)“exempt foreign trust”(f)(ii)(C)
- defined, for non-resident trust rules, 94(1)

Qualifying share

- defined
- RRSP or RRIF investment in cooperative corporation, Reg. 4901(2)
- prescribed, Reg. 6203

Qualifying site

- in respect of qualifying environmental trust, defined, 211.6(1)

Qualifying student

- defined, 118.6(1)

Qualifying subscription expense

- credit for, 118.02(2)
- defined, 118.02(1)

Qualifying substitute corporation

- defined, for foreign affiliate dumping rules, 212.3(4)

Qualifying survivor

- defined, for pooled registered pension plan rules, 147.5(1)

Qualifying tourism or hospitality entity

- defined, for Canada Emergency Wage Subsidy, 125.7(1), Reg. 8901.1(2)

Qualifying transfer

- defined, for merger of segregated funds, 138.2(1)

Qualifying transfers

- re past service event, Reg. 8303(6), (6.1), Reg. 8304(2)(h)

Qualifying transitional income

- defined (for corporate inclusion of partnership income), 34.2(1)
- reserve, deduction for, 34.2(11)

Qualifying trust

- acquisition of shares for labour-sponsored funds tax credit, 127.4(3)
- defined, 127.4(1), 211.7(1)

Qualifying trust annuity

- attribution of amount paid out from, 75.2(a)
- joint and several liability, 160.2(2.1), (5)
- death of taxpayer, effect of, 75.2(b)
- defined, 60.011(2), 248(1)

Qualifying withdrawals

- defined, Reg. 8307(3)

Quebec, see also Province

- accord with Canada for oil exploration, *see* Gulf of St. Lawrence oil exploration
- application of civil law to federal Acts, *Interpretation Act* 8.1, 8.2
- *Environmental Quality Act*, trust required by, exempt, 149(1)(z.1)
- Gaspé, *see* Gaspé Peninsula
- gift of succession in, deemed to be release or surrender, 248(9)
- labour-sponsored venture capital corporation of
- prescribed, Reg. 6700(a)(i), (vii)
- logging tax, credit for, 127(1), (2), Reg. 700
- matrimonial regime, 248(22), (23)
- Montreal, international banking centre until 2013, 33.1(3)
- northern, *see* Northern Canada
- Office de professions, dues deductible, 8(1)(i)(vii)
- Pension Plan, *see* Canada Pension Plan/Quebec Pension Plan
- qualifying arrangement, 248(3), (3.2)
- RRSP, RRIF, RDSP, RESP or TFSA set up in, deemed to be trust, 248(3)(c), 248(3.2)(d)
- renunciation of succession in, deemed to be disclaimed, 248(9)
- residents, federal tax abatement, 120(2)
- *Supplemental Pension Plans Act*, Reg. 8502(d)(ix), 8510(9)
- tax on failing to acquire replacement LSVCC share, matching federal tax, 211.81
- tax rates, *see* introductory pages
- usufructs, rights of use or habitation, and substitutions, deemed to be trusts, 248(3)

Quebec North Shore Paper Co. case overruled, 12(1)(r)**Quebec Parental Insurance Plan**

- deduction for premiums paid by self-employed person, 8(1)(1.2)
- benefit
- repayment of overpayment, deduction for, 60(n)(v.1)
- taxable, 56(1)(a)(vii)
- withholding tax, 153(1)(d.1)
- premium
- paid by employee
- as employee
- credit, 118.7:B(a.1), (a.2)
- deduction, 60(g)
- as employer, deduction, 8(1)(1.2)
- paid by employer, deduction, 9(1) (general accounting principles)

Quebec Pension Plan, see Canada Pension Plan/Quebec Pension Plan

Quebec sales tax, *see also* Goods and services tax (GST)

- input tax refund or deemed to be assistance, 248(16.1), *see also* Assistance/government assistance
- repaid, deemed to be reduction in assistance, 248(18.1)
- rebate
- deemed to be assistance, 248(16.1), *see also* Assistance/government assistance
- included in income, 12(1)(x)
- reduces capital cost of property, 13(7.1)

Queen, *see* Crown**Quota**

- disbursement, for charities, 149.1(1)“disbursement quota” Reg. 3700–3702
- farm, capital gains exemption, 110.6(1)“qualified farm property”(d)
- fishing, capital gains exemption, 110.6(1)“qualified fishing property”(d)

R**R&D**, *see* Scientific research and experimental development**RCA**, *see* Retirement compensation arrangement**RCA strip**

- constitutes advantage, 207.5(1)“advantage”(d)
- defined, 207.5(1)
- 100% tax on, 207.62(2)(c)

RCA trust

- defined, 207.5(1)
- excluded from various trust rules, 108(1)“trust”(d)

RCAAA, *see* Registered Canadian amateur athletic association**RCGTOH**, *see* Refundable capital gains tax on hand**RCMP**, *see* Royal Canadian Mounted Police**RDSP**, *see also* Registered disability savings plan (RDSP)

- defined, 146.4(1)“registered disability savings plan”, 248(1)“registered disability savings plan”

RDTOH, *see* Refundable dividend tax on hand**REIT**, *see* Real estate investment trust**REMIC**, *see* Real Estate Mortgage Investment Conduit**REOP**, *see* Reasonable expectation of profit**RESP**, *see also* Registered education savings plan

- defined, 146.1(1)“registered education savings plan”, 248(1)“registered education savings plan”

RESP annual limit

- defined, 146.1(1)
- limit on RESP contributions, 146.1(2)(k)
- penalty tax on exceeding limit, 204.9(1)“excess amount”(a)

RESP lifetime limit

- defined, 204.9

RFI, *see* Restricted financial institution**RHOSP**, *see* Registered home ownership savings plan**RIC**, *see* Regulated Investment Company (U.S.)**RIF**, *see* Retirement income fund**RIFE**, *see* Restricted interest and financing expense**RJO**, *see* Registered journalism organization**RLSVCC**, *see* Labour-sponsored venture capital corporation (LSVCC): registered**RPE**, *see* Ratio of permissible expenses**RPP**, *see* Registered pension plan**RPP annuity contract**, 147.4**RRIF**, *see also* Registered retirement income fund

- defined, 248(1)“registered retirement income fund”

RRIF strip, *see* RRSP strip**RRSP**, *see also* Registered retirement savings plan

- defined, 248(1)“registered retirement savings plan”
- depositary
- conditions for registration, 146(2)(c.3)

- defined, 146(1)“retirement savings plan”(b)(iii)
- exempt from tax on amounts added or earned, 146(20)
- income inclusion on death, 146(1)“tax-paid amount”(b), 146(8.8), (8.9)
- exempt from tax on income
- depositary RRSP, 146(20)
- trust RRSP, 146(4), 149(1)(r)
- strip, *see* RRSP strip

RRSP strip, *see* Registered plan strip**R.S.C. 1985 (5th Supp.)**, *see* Revised Statutes of Canada, 1985 (5th Supp.)**RSFT**, *see* Related segregated fund trust**RSO**, *see* Refund Set-Off program**RSP**, *see* Retirement savings plan**Rabbi**, *see* Clergy**Radar equipment**

- capital cost allowance for, Reg. Sch. II:Cl. 9

Radiocommunication equipment

- capital cost allowance for, Reg. Sch. II:Cl. 8, Sch. II:Cl. 9
- defined, *Interpretation Act* 35(1)

Radiological services

- medical expense, 118.2(2)(o)

Rail bogies or rail suspension devices

- capital cost allowance, Reg. 1100(1)(z), Reg. Sch. II:Cl. 35(b)

Railroad Retirement Act (U.S.)

- Tier 1 benefits, Canada-U.S. Tax Treaty:Art. XVIII:5

Railway

- cars, capital cost allowance, Reg. 1100(1)(z), (z.1b), (z.1c), Reg. Sch. II:Cl. 7(h)(ii), Sch. II:Cl. 35
- separate classes, Reg. 1101(5d)–(5d.2)
- common carrier, *see* companies (below)
- companies
- capital cost allowance, Reg. 1100(1)(z.1c), 1101(5d.2), Reg. Sch. II:Cl. 7, 35
- corporations, taxable income earned in a province, Reg. 406
- cross-border, profits exempt, Canada-U.S. Tax Treaty:Art. VIII:4
- employees
- away-from-home expenses of, deduction, 8(1)(e), (g)
- relieving telegrapher or station agent expenses, 8(1)(e)
- U.S. retirement benefits, Canada-U.S. Tax Treaty:Art. XVIII:5
- expansion property, Reg. 1100(1)(zc)
- locomotive, capital cost allowance, Reg. Sch. II:Cl. 6(j), Sch. II:Cl. 7(i), Sch. II:Cl. 10(y)
- refurbishing or reconditioning, Reg. 1102(19.1), (19.2)
- modernization property, Reg. 1100(1)(zc)
- rail suspension device, capital cost allowance, Reg. 1100(1)(z), (z.1b), Reg. Sch. II:Cl. 7(i), Sch. II:Cl. 35
- separate classes, Reg. 1101(5d)–(5d.2)
- rolling stock, exempt from non-resident tax, 212(1)(d)(vii), 212(16)
- sidings, capital cost allowance, Reg. 1100(8)
- systems, Reg. 1104(2), Reg. Sch. II:Cl. 4
- tank car, capital cost allowance, Reg. Sch. II:Cl. 6
- tier 1 pension benefits, Canada-U.S. Tax Treaty:Art. XVIII:5
- U.S. resident, exempt, Canada-U.S. Tax Treaty:Art. XV:3
- track and related property, capital cost allowance, Reg. 1100(1)(zb), Reg. Sch. II:Cl. 1(h)
- for mine, Reg. Sch. II:Cl. 10(m), Sch. II:Cl. 41
- separate classes, Reg. 1101(5e), (5e.1)
- traffic control equipment, capital cost allowance, Reg. 1100(1)(za.1), Reg. Sch. II:Cl. 1(i)
- separate classes, Reg. 1101(5e.1)
- trestles, Reg. 1100(1)(za.2), (zb), Reg. Sch. II:Cl. 3
- separate classes, Reg. 1101(5e.2), (5f)

Railway system

- defined, Reg. 1104(2)

Rapid transit car

- capital cost allowance for, Reg. Sch. II:Cl. 8

Rapidly depreciating electronic equipment

- capital cost allowance, Reg. 1101(5p), Reg. Sch. II:Cl. 10(f)

Rate reduction for zero-emission technology manufacturing, 125.2**Rate reduction payment**

- treated as interest, 18(9.1)

Rates of capital cost allowance, Reg. 1100**Rates of tax, see also Surtax**

- alternative minimum tax, 127.51
- capital tax, financial institutions, 190.1
- corporation, 123
 - abatement, 124
 - deposit insurance, 137.1(9)
 - excessive election, 184(2)
 - investment corporations, 130
 - manufacturing and processing, 125.1
 - non-resident, carrying on business in Canada, 219
 - personal services business, 123.4(1)“full rate taxable income”(a)(iii), 123.5
 - small business deduction, 125
 - surtax (before 2008), 123.2
- DPSP trust
 - non-qualified investments, on, 198
- deposit insurance corporation, 137.1(9)
- income-splitting tax, 120.4(2)
- individual, 117(2)
 - abatement for provincial schooling allowance, 120(2)
 - averaging, *see* Averaging of income
 - general averaging
 - surtax, 180.1
 - income not earned in a province, 120(1)
 - indexing of, 117.1
 - over-contributions to deferred plans, 204.1
- investment corporation, 130(1)
- investment income of life insurer, 211.1(1)
- minimum tax, 127.51
- non-resident withholding tax, 212
- Part I (regular tax)
 - corporation, 123(1)(a), 124(1)
 - deposit insurance corporation, 137.1(9)
 - general reduction, 123.4(2)
 - reduction for CCPC, 123.4(3), 125
 - surtax (before 2008), 123.2
 - income not earned in a province, 120(1)
 - income splitting tax, 120.4(2)
 - individual, 117(2)
 - minimum tax, 120.4(2)
 - Part I.1 (individual surtax), 180.1(1)
 - Part I.2 (OAS clawback), 180.2(2)
 - Part I.3 (Large Corporations Tax) [pre-2006], 181.1(1)
 - Part II (tobacco manufacturers’ surtax), 182(1)
 - Part II.1 (corporate distributions tax), 183.1(2)
 - Part III (excessive capital dividend election), 184(2)
 - Part III.1 (excessive eligible dividend election), 185.1(1)(a), (b)
 - Part IV (dividends received by private corporation), 186(1)
 - Part IV.1 (preferred shares), 187.2
 - Part V
 - charity revocation tax, 188(1.1)
 - charitable foundation, transfer of property, 188(3)
 - private foundation, non-qualified investments, 189(1)
 - Part VI (financial institutions capital tax), 190.1(1)
 - Part VI.1 (preferred shares), 191.1(1)
 - Part IX (cumulative offset account), 196(1)
 - Part IX.1, 197(2)
 - Part X
 - DPSP, inadequate consideration, 201

- DPSP, non-qualified investments or use of assets as security, 198(1)
 - Part X.1
 - DPSP with excess amount, 204.1(3)
 - RRSP overcontributions, 204.1(2.1)
 - Part X.2 (registered investment holding non-prescribed investment), 204.6(1)
 - Part X.3 (labour-sponsored fund insufficiently invested), 204.82(1), (3)
 - Part X.4 (overcontribution to RESP), 204.91
 - Part XI.01
 - advantage extended in relation to RRSP, RRIF, TFSA, RESP or RDSP, 207.05(2)
 - excess TFSA contributions, 207.02
 - non-resident contributions to TFSA, 207.03
 - RRSP, RRIF, TFSA, RESP or RDSP holding prohibited or non-qualified investment, 207.04(2), (7)
 - Part XI.1
 - DPSP holding non-qualified investment, 207.1(2)
 - RESP holding non-qualified investment, 207.1(3)
 - Part XI.2 (disposition of cultural property by institution), 207.3
 - Part XI.3 (retirement compensation arrangement), 207.7(1)
 - Part XI.4 (employees profit sharing plan), 207.8(2)
 - Part XI.5 (ELHT owning share or debt of participating employer), 207.9(3)
 - Part XII.1 (carved-out income), 209(2)
 - Part XII.2 tax (designated income of certain trusts), 210.2(1), (2)
 - Part XII.3 (investment income of life insurer), 211.1(1)
 - Part XII.4 (qualifying environmental trust), 211.6(2)
 - Part XII.5 (recovery of LSVCC credit), 211.8(1), 211.81
 - Part XIII (withholding tax)
 - dividends paid to non-residents, 212(2) (as reduced by treaty)
 - film and video royalties, 212(5) (as reduced by treaty)
 - other passive income of non-residents, 212(1) (as reduced by treaty)
 - Part XIII.1 (foreign bank), 218.2(1) (as reduced by treaty)
 - Part XIII.2, 211.2(2)(b)
 - Part XIV
 - branch tax, 219(1) (as reduced by treaty)
 - corporate emigration, 219.1
 - registered charities, 188
 - registered investments, re, 204.4
 - trust, 122(1)

Ratio of permissible expenses

- defined, for interest deduction restrictions, 18.2(1)

Reacquired property, ITAR 26(6)**Reading services**

- disability supports deduction, 64(a)A(ii)(L)
- medical expense credit, 118.2(2)(1.43)

Real estate, see Real property**Real estate investment trust, see also Mutual fund trust**

- allowed as mutual fund trust, 108(2)(b)(ii)(B), 108(2)(c), 132(6)(b)(ii)
- defined, for SIFT trust and partnership distributions, 122.1(1)
- for stapled-security rules, 18.3(1), 122.1(1)
- excluded from income tax distributions tax, 122.1(1)“SIFT trust”
 - United States
 - dividends paid by, Canada-U.S. Tax Treaty:Art. X:7(c)

Real Estate Mortgage Investment Conduit

- excess inclusion, Canada-U.S. Tax Treaty:Art. XI:9

Real or immovable property

- defined, for SIFT trust and partnership distributions, 122.1(1)

Real property, see also Building; Land; Real or immovable property; Rent

- acquired
 - capital cost, 13(5.2)

Real property (*cont'd*)

- capital, taxable, Canada-U.S. Tax Treaty:Art. XXIII
- defined, *Income Tax Conventions Interpretation Act* s. 5
- disposed of
 - non-resident, by, 216(5)
 - recaptured depreciation, 13(5.3)
- donation after sale of, capital gain exempt, 38(a.4), 38.3, 38.4 (abandoned)
- income from, Canada-U.S. Tax Treaty:Art. VI
- interest in, defined, 248(4)
- leasehold interest in, *see* Leasehold interest
- life estate in, 43.1
- non-qualifying real property, defined, 110.6(1)
- outside Canada
 - foreign tax credit to emigrant on disposition, 126(2.21)
 - foreign tax credit to trust, 126(2.21)
 - reporting of to CRA, 233.3
- principal-business corporations
 - associated, base level deduction, 18(2.3)–(2.5)
 - base level deduction, 18(2)(f), 18(2.2)
- rent paid before acquisition, deemed CCA, 13(5.2)
- trust owing, whether a unit trust, 108(2)(c)

Real right in an immovable

- meaning of, 248(4.1)

Real-time captioning services, *see* Captioning services**Reality television**

- ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(vii)
- ineligible for film/video production services credit, Reg. 9300(2)(g)

Reappropriations of amounts, 221.2**Reasonable efforts**

- to determine transfer prices
 - defined, 247(4)
 - required, 247(3)(a)(ii)(B)

Reasonable expectation of profit

- not required to deduct loss from business or property, 9(2) (Notes)
- personal or living expenses, 18(1)(h), 248(1)
- required for loss carryforward after change in control, 111(5)(a)(i), 111(5)(b)(i)

Reasonable return

- defined, for income-splitting tax, 120.4(1)

Reasonableness

- criterion for expenses, 67

Reassessment, *see also* Assessment

- after normal reassessment period, 152(4)–(5)
 - disposition of vessel, after, 13(18)
- consequential on other change, 152(4.3)
- constitutes an assessment, 248(1)“assessment”
- deceased’s estate, election re losses, 152(6)
- election to capitalize interest, on, 21(5)
- exercise of option, on, 49(4), (5)
- extended reassessment period, 152(4)(b)
- Minister, by, 152(4), (4.1), (6), 165(3)
 - after filing notice of objection, 165(5)
 - disposing of appeal, on consent, 169(3)
- normal reassessment period, defined, 152(3.1)
- second notice of objection not required, 165(7)
- time for, 152(4), 231.8
- time to object to, 165(1)
- unused Part I.3 tax credit, 152(6)(f)
- validity, 165(5), (6)
- waiver of limitation period by taxpayer, 152(4)(a)(ii), 152(4)(c)
- within normal reassessment period, 152(4)

Recapture, *see also* Clawback; Negative amounts

- capital cost allowance, *see* Capital cost allowance: recapture

- eligible capital property, 14(1) [before 2017]
- goodwill, 14(1) [before 2017]
- investment tax credit, 127(27)–(36)
- SR&ED expenditures, 37(6)

Receivables

- in later year, reserve for, 20(1)(n), 20(8)
- where property repossessed by creditor, 79.1(4)
- 1971, ITAR 23(5)“1971 receivables”

Received capacity

- adds room for carryforward of denied interest expenses, 111(1)(a.1)B
- defined, for interest deduction restrictions, 18.2(1), (4)
- reduces limitation on interest expense, 18.2(2)D

Receiver or receiver-manager, *see also* Legal representative

- clearance certificate before distributing property, 159(2)
- deemed to be legal representative, 248(1)“legal representative”
- obligations of, 159
- return to be filed, 150(3)
- withholding tax, liability for, 227(5), 227(5.1)

Recipient

- defined, for hybrid mismatch arrangement rules, 18.4(1)
 - multiple recipients, 18.4(19)

Reclamation obligations

- no reserve for, 20(7)(d)

Reclamation of mines, *see* Qualifying environmental trust**Reclassification**

- depreciable property, change in class, 13(5)
- expenditures, R&D claims, 37(12)

Recognized derivatives exchange

- defined, for synthetic equity arrangement rules, 248(1)

Recognized forestry professional

- defined, Reg. 7400(3)

Recognized stock exchange

- defined, 248(1)

Record, *see also* Books and records

- defined, 248(1)

Record suspension

- defined, 149.1(1.01)
- effect on entitlement to operate charity, 149.1(1)“ineligible individual”(a)(ii)

Recovery

- labour-sponsored funds tax credit, *see* Labour-sponsored funds tax credit: recovery
- limit, *see* Recovery limit

Recovery limit

- defined, for non-resident trusts, 94(8)

Recovery wage subsidy rate

- defined, for Canada Recovery Hiring Program, 125.7(1)

Recreation program

- youth boarding allowance non-taxable, 6(1)(b)(v.1)

Recreation vehicle service technician

- apprenticeship job creation credit, 127(9)“investment tax credit”

Recreational club

- non-profit, exempt, 149(1)(l), 149(5)

Recreational facilities

- use of, expense not deductible, 18(1)(l)(i)

Recreational program for children, *see* Children’s Arts Tax Credit (pre-2017)**Recreational property**

- capital cost allowance, Reg. 1102(17)

Rectification, 169(1) (Notes)**Record suspension**

- defined, 149.1(1.01)
- effect on entitlement to operate charity, 149.1(1)“ineligible individual”(a)(ii)

Red Seal trades

- prescribed, for apprenticeship credit, Reg. 7310

Redeeming entity

- defined, 135.1(7)

Redemption of shares by corporation

- capital loss denied, 40(3.6)
- deemed dividend of excess over paid-up capital, 84(3)

Redetermination. *see* Determination**Reduction of tax.** *see* Abatement of tax**Reed Stenhouse Companies Ltd.**

- Class I shares, no deemed dividend on redemption, 84(8), Reg. 6206

Reference security

- defined, 18.3(1)“stapled security”(a)

Refinery

- capital cost allowance, Reg. Sch. II:Cl. 10(u), Sch. II:Cl. 41

Refrigeration and air conditioning mechanic

- apprenticeship job creation credit, 127(9)“investment tax credit”

Refugee

- entitled to Canada Child Benefit, 122.6“eligible individual”(e)(iii)

Refund

- after normal reassessment period, 152(4.2), 164(1.5)
- assignment of, by corporation, 220(6), (7)
- capital gains
 - mutual fund corporation, to, 131(2), (3)
 - mutual fund trust, to, 132(1), (2)
- Crown royalty, income inclusion, 12(1)(x.2)
- dividend
 - mutual fund corporation, to, 131(5)
 - private corporation, to, 129(1)
- duty of Minister, 164(4.1)
- employees profit sharing plan, to former beneficiary, 144(9)
- fraudulently obtained, offence, 239(1.1)
- included in income, 12(1)(x)(iv)
- interest on, 164(3)–(4)
- labour-sponsored funds tax credit clawback, 211.82
- non-resident tax, of, 227(6)–(7)
- of payments, *see* Refund of payments
- overpayment of tax, of, 164
 - application to other taxes, 164(2)
 - Part I tax, 164
- partial refundable investment tax credit re scientific research and development, 164(1)
- premiums, of, *see* Registered retirement savings plan: refund of premiums
- provincial portion of income tax, 164(1.4)
- RRSP premiums, of, 146(1)“refund of premiums”
 - deemed receipt of, 146(8.1)
- reassessment to give rise to, 152(4.2)
- refundable dividend tax, 129
 - application to other liability, 129(2)
 - repayment on objections and appeals, 164(1.1)
 - returns must be filed before payable by Minister, 164(2.01)
- tax, of
 - deferred profit sharing plan, to, 202(2)
 - application to other taxes, 203
 - excessive, 160.1(1)
 - tax on non-qualified investment, of
 - on disposition, 198(4), 199(2)
 - on recovery of security, 198(5)

Refund benefit

- defined, Reg. 8300(1)

Refund interest

- defined
 - for M&P credit on resource income, Reg. 5203(4)

- for corporate interest offset, 161.1(1)
- payable to taxpayer, 164(3)
- rate of interest, Reg. 4301(b)

Refund of payments

- defined, for education savings plan, 146.1(1)

Refund of premiums. *see* Registered retirement savings plan: refund of premiums**Refund Set-Off program,** 164(2)**Refundable capital gains tax on hand**

- mutual fund corporation, of, 131(6)“refundable capital gains tax on hand”
 - carryover to mutual fund trust on qualifying exchange, 132.2(3)(i)
 - reduction of, 131(9)
- mutual fund trust of, 132(4)“refundable capital gains tax on hand”
 - addition to following reorganization, 132.2(3)(i)

Refundable credits

- Canada Child Benefit, 122.61(1)
- Canada Workers Benefit (former Working Income Tax Benefit), 122.7
- Canadian film/video production credit, 125.4
- carbon tax rebate, 122.8
- child fitness credit (2015-2016), 122.8
- Climate Action Incentive, 122.8
- dividend refund, 129(1)
- film or video production services credit, 125.5
- GST credit, 122.5(3)
- greenhouse gas tax rebate, 122.8
- individual resident in Quebec, 120(2)
- investment tax credit, 127.1(1)
- journalism labour credit, 125.6
- medical expenses, 122.51
- qualifying environmental trust credit, 127.41(3)
- teacher school-supplies credit, 122.9
- U.S. social security tax adjustment due to treaty amendment, Canada-U.S. Tax Treaty:Art. XVIII:5

Refundable dividend tax on hand, *see also* Dividend refund

- aggregate investment income, defined, 129(4), 248(1)
- amalgamation, on, 87(2)(aa)
- deemed, 186(5)
- defined, 129(3) [repealed], 129(4)“eligible refundable dividend tax on hand”, “non-eligible refundable dividend tax on hand”
- foreign investment income, defined, 129(4)
- “income” or “loss” defined, 129(4)
- meaning of certain expressions, 129(8)
- parent’s, after subsidiary wound up, 87(2)(aa), 88(1)(e.2)
- refund of, 129(1)
- taxable dividend, defined, 129(7)

Refundable federal sales tax credit, 122.4 [repealed]**Refundable goods and services tax credit,** 122.5, *see also* Goods and services tax (GST): refundable credit**Refundable investment tax credit**

- deemed deduction from tax otherwise payable, 127.1(3)
- defined, 127.1(2)
- partial refund in respect of, 164(1)

Refundable medical expense credit, 122.51**Refundable Part IV tax,** 186

- refund of, 129(1)

Refundable Part VII tax

- defined, 192(3), 248(1)

Refundable Part VIII tax on hand

- defined, 194(3), 248(1)

Refundable taxes

- investment income of CCPC, 123.3, *see also* Dividend refund
- Part IV tax, 186(1)

Refundable taxes (*cont'd*)

- prohibited investments for RRSP, RRIF, TFSA, RESP or RDSP, 207.04
- retirement compensation arrangement arrangement, 207.5(1)

Registered animal

- defined, Reg. 1802(5)

Registered Canadian amateur athletic association

- business activities of, 149.1(6.01)
- constitutes qualified donee for donations, 149.1(1)“qualified donee”(c)
- defined, 248(1)
- donation to, 149.1(1)“qualified donee”(c)
 - by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
- exempt from tax, 149(1)(g)
- gift to, *see* donation to (above)
- information return required from, 149.1(14)
- penalties, 188.1
 - penalty reduced by giving funds to another RCAA, 188(1.4), 189(6.3)
- political activities of, 149.1(6.201)
- public disclosure of information about, 149.1(15), 241(3.2)
- receipts, Reg. 3500, 3501
- records to be kept, 230(2)
- refusal by CRA to register, 149.1(22)
 - appeal from, 172(3)(a)
 - objection to, 168(4)
- revocation of registration, 149.1(4.2), 168
 - appeal from, 172(3)(a)
 - objection to, 168(4)
- suspension of receipting privileges, 188.2(1)

Registered charity, *see also* Charity

- accumulation of property, 149.1(8), (9)
- annulment of registration, *see* registration (below)
- bequest to, *see* Enduring property [repealed]
- books and records, 230(2)
- charitable activities
 - Minister may specify amount expended on, 149.1(5)
- communication of information by Minister, 149.1(15)
- constitutes qualified donee for donations, 149.1(1)“qualified donee”(b)
- controlled by person with criminal record, *see* Ineligible individual
- corporate tax return not required, 150(1.1)(a)
- criminal offence by director, *see* Ineligible individual
- defined, 248(1)
- designation as foundation or organization, 149.1(6.3)
 - objection to, 168(4)
- designation of, by Minister, as public foundation etc., 149.1(6.3)
 - appeal from, 172(3)(a.1)
- director committing offence, *see* Ineligible individual
- disbursement excess, 149.1(20)
 - defined, 149.1(21)
- disbursement quota, 149.1(1)“disbursement quota”
- donations to, *see* Gifts and donations (charitable)
- employee of, penalty for false statement in receipt, 188.1(9), (10)
- endowment to, *see* Enduring property [repealed]
- exemption for, 149(1)(f)
- false statement to obtain registration, revocation, 149.1(4.1)(c)
- fund-raising event
 - exempted from general limitation on entertainment expense deduction, 67.1(2)(b)
- gift to another registered charity
 - revocation of registration, 149.1(4.1)
- gifts to, 118.1(1), (3)
- information returns, 149.1(14), Reg. 204(3)(c)

- investment assets, disbursement requirement, 149.1(1)“disbursement quota”B(a)
 - loan to donor, 118.1(16)
 - Minister may specify amount expended on charitable activities, 149.1(5)
 - non-qualified investment, tax re, 189
 - officer of, penalty for false statement in receipt, 188.1(9), (10)
 - option granted to, 110.1(10)–(13), 118.1(21)–(24)
 - partnership look-through rule, 149.1(11)
 - penalties, 188.1, 189(6.3)
 - appeal of penalty, 189(8), 169(1)
 - carrying on business, 188.1(2)
 - conferring undue benefit on any person, 188.1(4), (5)
 - failing to file information return, 188.1(6)
 - false statement in receipt, 188.1(9), 10
 - foundation acquiring control of corporation, 188.1(3)
 - incorrect receipt, 188.1(7)–(10)
 - making gift to delay charitable expenditures, 188.1(11)
 - objection to penalty, 189(8), 165(1)
 - penalty reduced by giving funds to another charity, 189(6.3)
 - penalty taxes, 188, 189
 - political activities of, *see* Political activity
 - public information return, 149.1(14), (15)
 - receipts issued by
 - penalty for incorrect or false information, 188.1(7)–(10)
 - revocation for incorrect or false information, 168(1)(d)
 - requirements, Reg. 3501
 - registration of, 248(1)“registered charity”
 - annulment of registration, 149.1(23), (24)
 - appeal from, 172(3)
 - objection to, 168(4)
 - refusal by Minister to register, 149.1(22)
 - appeal from, 172(3)
 - objection to, 168(4)
 - revocation of, 149.1(2)–(4.1), 168
 - appeal from, 172(3)
 - deemed year-end, 188(1)
 - grounds for, 149.1(2)–(4.1), 168
 - objection to, 168(4)
 - returns required, 189(6.1)
 - tax on, 188(1.1)
 - reduction of revocation tax liability, 189(6.2)
 - remainder interest in real property, disposition to, 43.1(1)
 - returning gift to donor, 110.1(14)–(17), 118.1(25)–(28), Reg. 3501.1
 - specified gift, defined, 149.1(1)
 - suspension of receipting privileges, 188.2
 - appeal of suspension, 189(8), 169(1)
 - objection to suspension, 189(8), 165(1)
 - tax re, 188, 189
 - taxation year, 149.1(1)
 - ten-year gift to, *see* Enduring property [repealed]
 - terrorism, supporting, *see* Charities Registration (*Security Information*) Act
 - transfer of property
 - tax on, 188(3), (4)
- Registered disability savings plan (RDSP), 146.4**
- advantage, 207.01(1)“advantage”, 207.05
 - attribution rules do not apply, 74.5(12)(a.2)
 - cessation of eligibility for disability tax credit
 - RDSP can stay open indefinitely, 146.4(4)(p)(ii)
 - conditions, 146.4(2)–(4)
 - defined, 146.4(1)
 - disposition of property to, capital loss nil, 40(2)(g)(iv)(A)
 - election on ceasing to be DTC-eligible, 146.4(4.1), (4.2)
 - emigration from Canada, no tax on, 128.1(10)“excluded right or interest”(a)(iii.1)
 - exempt from tax, 146.4(5)
 - holder of, *see* Holder

Index

- Registered disability savings plan (RDSP) (*cont'd*)
- information return
 - required for payments to non-residents, Reg. 202(2)(n)
 - required for payments to residents, Reg. 200(1)
 - whether required for RDSP, Reg. 204(3)(g)
 - interest on money borrowed for, not deductible, 18(11)(i)
 - issuer extending advantage, 207.01(1)“advantage”
 - non-compliant, 146.4(10)–(12)
 - non-qualified investment
 - defined, 207.01(1)
 - tax on, 207.04
 - payment from
 - not counted for purposes of Canada Child Benefit, 122.6“adjusted income”
 - not counted for purposes of GST/HST Credit, 122.5(1)“adjusted income”
 - not counted for purposes of Old Age Security clawback, 180.2(1)“adjusted income”
 - tax on, 56(1)(q.1), 146.4(6)
 - withholding tax
 - non-resident, 212(1)(r.1)
 - resident, 153(1)(i), Reg. 103.1
 - prohibited investment, tax on, 207.04
 - qualifying family member
 - becoming holder of RDSP, 146.4(1)“disability savings plan”(a)(ii)(B.1), (B.2)
 - defined, 146.4(1)
 - rules governing, 146.4(1.5)–(1.7)
 - Quebec, in, deemed to be trust, 248(3)(c)
 - reversionary trust rules do not apply, 75(3)(a)
 - rollover to
 - from RRSP, RRIF or RPP, 60.02
 - RESP investment income, 146.1(1.1), (1.2)
 - shortened life expectancy rules, 146.4(1.1)–(1.4)
 - tax payable by
 - borrowing money, 146.4(5)(a)
 - carrying on business, 146.4(5)(b)
 - non-qualified investments, 146.4(5)(b)
 - on acquisition of shares not at fair market value, 207.1(5)
 - on non-qualified or prohibited investment, 207.04
 - transfer to another RDSP, 146.4(8), (9)
 - withholding, *see* payment from (above)
- Registered education savings plan**, 146.1, *see also* Education savings plan
- accumulated income payment
 - defined, 146.1(1)
 - included in income, 146.1(7.1)
 - restrictions on making, 146.1(2)(d.1)
 - rollover to registered disability savings plan, 146.1(1.1), (1.2)
 - advantage, 207.01(1)“advantage”, 207.05
 - amendments to, 146.1(4.1)
 - amounts received, income, 56(1)(q)
 - annual limit, *see* RESP annual limit
 - annuities, holding of, 146.1(1)“qualified investment”(c)
 - beneficiary under
 - amount included in income, 146.1(7)
 - defined, 146.1(1)
 - conditions for registrations, 146.1(2)
 - contribution limits, *see* RESP annual limit; RESP lifetime limit
 - defined, 146.1(1)
 - distance education programs, 146.1(2)(g.1)
 - educational assistance payment, *see* Educational assistance payment
 - emigration of beneficiary, no deemed disposition, 128.1(10)“excluded right or interest”(a)(iii)
 - “excess amount” defined, 204.9(1), (2)
 - excluded amount, 146.1(7.2)
 - excluded from various trust rules, 108(1)“trust”(a)
 - family plan, 146.1(2)(j)
 - information returns
 - by promoters, 146.1(15)
 - by trustees, 146.1(13.1)
 - interest on money borrowed to contribute to, not deductible, 18(11)(h)
 - locked-in annuities, 146.1(1)“qualified investment”(c)
 - money borrowed for contribution to
 - limitation on deductibility, 18(11)(g)
 - non-qualified investment
 - defined, 207.01(1)
 - tax on acquiring, 207.04
 - tax on holding before 2017, 207.1(3)
 - notice of intent to revoke registration, 146.1(12.1)
 - appeal from, 172(3)(e.1)
 - notice of revocation, 146.1(12.2)
 - notification to beneficiaries, 146.1(2)(l)
 - overcontributions to, tax on, 204.9–204.93 (Part X.4)
 - payments out of
 - non-residents, to, 212(1)(r)
 - residents, to, 56(1)(q), 146.1(7)
 - prohibited investment, tax on, 207.04
 - promoter extending advantage, 207.01(1)“advantage”
 - qualified investment
 - defined, 146.1(1)
 - holding non-qualified investment
 - revocation of plan, 146.1(2.1), (12.1)
 - tax on, 207.1(3)
 - Quebec, in, deemed to be trust, 248(3)(c)
 - refund of payments under, 146.1(1)
 - registration
 - conditions for, 146.1(2)
 - deemed date of, 146.1(12)
 - revocation of, 146.1(12.1), (12.2), (13), (14)
 - reversionary trust rules do not apply, 75(3)(a)
 - revocable, 146.1(2.1)
 - revocation, 146.1(13)
 - notice of, 146.1(12.1), (12.2)
 - rollover of investment income to RDSP, 146.1(1.1), (1.2)
 - subscriber not taxable, 146.1(6)
 - tax payable by
 - on acquisition of shares not at fair market value, 207.1(5)
 - on non-qualified or prohibited investment, 207.04
 - tax payable by subscribers, 204.91
 - transfer of property to another plan, 146.1(2)(g.2), (j)(ii)(B), 146.1(6.1), 204.9(5)
 - trust
 - rollover to new trust, 248(1)“disposition”(f)(vi)
 - trust not taxable, 146.1(5), 149(1)(u)
 - withholding of tax from payments, 153(1)(t), Reg. 103(6)(g), 103(8)
- Registered home ownership savings plan**, 146.2 [repealed]
- Registered investment**
- defined, 204.4(1), 248(1)
 - list of, 204.5
 - Minister and, 204.4(2)–(5), 204.5
 - qualifies for RDSP or RESP, Reg. 4900(5)
 - tax on
 - on acquisition of shares not at fair market value, 207.1(5)
 - on holding certain property, 204.6
- Registered journalism organization**, *see also* Qualified Canadian journalism organization; Qualifying journalism organization
- defined, 248(1)
 - exempt from tax, 149(1)(h)
 - information return required, 149.1(14.1)
 - qualifies for charitable donations, 149.1(1)“qualified donee”(b.1)

Registered labour-sponsored venture capital corporation, *see* Labour-sponsored venture capital corporation (LSVCC): registered

Registered life insurance policy

- defined, 211(1)

Registered mail

- no longer needed, for notice of objection, 165(2)

Registered national arts service organization

- benefits from, included in income, 56(1)(z.1)
- deemed to be registered charity, 149.1(6.4)
- defined, 248(1)
- exempt from tax, 149(1)(1)
- prescribed conditions, Reg. 8700
- receipts issued by, Reg. 3500“registered organization”
- registration, 149.1(6.4)
- revocation of designation, 149.1(6.5)

Registered non-resident insurer

- defined, Reg. 804
- withholding requirements, Reg. 800–805.1

Registered organization

- defined, for donations and gifts, Reg. 3500

Registered pension plan, 147.1–147.3, Reg. Part LXXXIII–LXXXV

- actuarial report, 147.2(3), Reg. 8410
- actuary, defined, 147.1(1)
- administrator, 147.1(6)–(7)
 - defined, 147.1(1)
 - obligations, 147.1(7)
 - requirement, 147.1(6)
 - separate liability, 147.1(16)
- amendments to, 147.1(4), (15), 172(3), (5), Reg. 8511, 8512(3)
- annuity, rollover from RPP, 147.4
- appeal
 - refusal to accept amendment, from, 172(3)(f.1), 172(5)
 - refusal to register, from, 172(3)
- application for registration, 147.1(2), Reg. 8512(1)
- “as registered” meaning, 147.1(15)
- average wage, defined, 147.1(1)
- balance of annuitized voluntary contributions, 60.2(2)
- benefit provisions, transfer between, 147.3(14.1)
- benefits from
 - association of, with employers, Reg. 8305
 - during phased retirement, Reg. 8503(16)–(25)
 - flowed through trust, 104(27)
 - unauthorized, 147.3(10), (12)
 - maximum, Reg. 8504
 - rollover for financially dependent child, 60(1)(v)(B.01)
 - taxable, 56(1)(a)(i)
- borrowing restrictions, Reg. 8502(i), (i.1)
- bridging benefits, pension income credit, 118(8.1)
- buy-out annuity, 147.4(1)
- COVID-19 relief for 2020–22, *see* COVID-19
- certification of past service benefit, *see* Past service event
- communication of information re, 241(4)(d)(vii)
- commutation of benefits, Reg. 8503(2)(m), (n), 8503(2.1)
- compensation, defined, 147.1(1)
- conditions, 147.1(2), (5), Reg. 8501–8506
- continuation of, in amalgamation, 87(2)
- contract under, 254
- contribution error correction, *see* Pension adjustment correction; Permitted corrective contribution (to pension plan)
- contribution made in error, repayment of, 56(1)(a)(i)(G), 147.1(19)
- contribution, prescribed, 147.2(2), Reg. 8516
- death of contributor, amount deductible, 147.2(6)
- defined, 248(1); ITAR 17(8)
- defined benefit provision, defined, 147.1(1)
- definitions, 147.1(1)
 - designated plan, Reg. 8515
 - special rule, Reg. 8515
 - eligible contribution, defined, 147.2(2), Reg. 8515(5), 8516
 - emigration of member, no deemed disposition, 128.1(10)“excluded right or interest”(a)(viii)
 - employee’s contribution deductible, 147.2(4), Reg. 8502(b)(i), 8503(4)(a), (b)
 - employer’s contribution
 - deductible, 20(1)(q), (s), 147.2(1), Reg. Part XXVII
 - defined benefit provision, 147.2(2)
 - filing of actuarial report, 147.2(3)
 - limits, 147.1(8), (9), Reg. 8506(2)
 - not taxable benefit, 6(1)(a)(i)
 - exempt from tax, 149(1)(o), (o.1)
 - excluded from various trust rules, 108(1)“trust”(a)
 - filing annual return, Reg. 8409
 - fixing contribution errors, *see* Pension adjustment correction; Permitted corrective contribution (to pension plan)
 - foreign plan, *see* Foreign plan (pension plan)
 - foreign service, *see* Foreign service
 - grandfathered plan
 - complying before March 1996 budget date, Reg. 8509(13)
 - defined, Reg. 8500(1)
 - includes references to “approved” plan, ITAR 17(8)
 - income accruing in
 - not taxed by U.S., Canada–U.S. tax treaty Canada-U.S. Tax Treaty:Art. XVIII:7
 - information return, Reg. 8409
 - insolvent employer, commutation of benefits
 - rollover to RRSP, 146(5.2), (5.201)
 - transfer to another RPP, Reg. 8517(3)–(3.02)
 - insurance corporation demutualization conversion benefit, 139.1(12), (14)
 - limits on contributions, 147.1(8), (9), 147.2(4), Reg. 8506(2)
 - member of plan, defined, 147.1(1)
 - Minister to obtain advice of Superintendent of Financial Institutions, 147.1(17)
 - money borrowed for contribution to
 - limitation on interest deductibility, 18(11)(c)
 - money purchase limit, defined, 147.1(1)
 - money purchase provision
 - benefits permissible, Reg. 8506(1)
 - contributions eligible, Reg. 8506(2)
 - defined, 147.1(1)
 - minimum amount, Reg. 8506(5), (7), (7.1)
 - for 2008, Reg. 8506(7)(b)
 - transfer from RRIF, 146.3(14.1)(b)
 - multi-employer plan
 - anti-avoidance, 147.1(14)
 - becoming revocable plan, 147.1(9)
 - defined, 147.1(1), Reg. 8500(1)
 - pension adjustment limits, 147.1(9)
 - registration requirements, Reg. 8510(7)
 - specified
 - defined, 147.1(1), Reg. 8510(2)
 - rules, Reg. 8510(3), (5)–(7)
 - no tax payable by, 149(1)(o), (o.1)
 - non-member benefits, Reg. 8500(8)
 - non-residents
 - payment under, withholding tax, 212(1)(h)
 - participating employer, defined, 147.1(1)
 - past service benefits, determination of, 147.1(10)
 - past service contributions
 - additional voluntary contributions, deductible for 1986, 8(1.1)
 - by employer
 - deductible, 147.2(2), Reg. 8516(2)
 - past service event
 - defined, 147.1(1), Reg. 8300(1), (2)

Registered pension plan (*cont'd*)

- restrictions on pension funding and benefits, 147.1(10), Reg. 8306, 8307(2)
- past service payments into, 57(4)
- payment under, taxable, 56(1)(a)(i), 212(1)(h), 254
- pension adjustment, *see* Pension adjustment
- pension adjustment limits, *see also* Pension adjustment
- phased retirement, Reg. 8503(16)–(25)
- plan as registered, 147.1(15)
- pooled, *see* Pooled registered pension plan
- prohibited investments, Reg. 8502(h), 8514(1)
- refund of undeducted past service additional voluntary contributions, 60.2(1)
- registration of, 147.1(2), (3)
 - additional conditions, 147.1(5)
 - amendments, conditions for acceptance of, 147.1(4)
 - deemed from time of application, 147.1(3)
 - regulations, 147.1(18), Reg. Part LXXXIII–LXXXV
 - revocation of, 147.1(13), 147.3(12)
 - notice, 147.1(12)
 - notice of intention, 147.1(11)
- reorganization of money purchase plan, 147.3(7.1)
- repayment of post-1989 benefits, 60(j.04)
- reporting requirements, Reg. 8400–8410
- retiring allowances transferred to, 60(j.1)
- reversionary trust rules do not apply, 75(3)(a)
- rollover, *see* transfer from; transfer to
- salary deferral leave plan, Reg. 8508
- shared-funding arrangement, Reg. 8501(6.1)
- single amount, defined, 147.1(1)
- specified multi-employer plan
 - defined, 147.1(1), Reg. 8510(2)
 - rules, Reg. 8510(3), (5)–(7)
 - spouse, defined, 147.1(1)
 - successor plan, Reg. 8308(8)
- termination of, Reg. 8409(3)
- transfer of members to new plan, Reg. 8500(9)
- transfer of property between benefit provisions, 147.3(14.1)
- transfer to, Reg. 8502(b)(iv)
 - another RPP, from, 147.3
 - DPSP, from, 147(19)(d)(i)
 - PRPP, from, 147.5(21)(c)(iii)
 - RRIF, from, 146.3(14.1)(b)
 - RRSP, from, 146(16)(a)
 - transfer from
 - ALDA (advanced life deferred annuity), to, 147.3(1)(c)(iv)
 - actuarial surplus, of, 147.3(4.1), (7.1)
 - annuity, to, 147.4
 - another RPP, to, 147.3(1)–(8), Reg. 8517
 - death, on, 147.3(7)
 - deemed, 147.3(14)
 - division of amount transferred, 147.3(11)
 - excess, 147.3(13)
 - lump sum on death, 147.3(7)
 - marriage breakdown, on, 147.3(5)
 - money purchase plan to money purchase plan, 147.3(7.1)
 - pre-1991 contributions, 147.3(6)
 - RRIF, to, 146.3(2)(f)(v), (vi), 147.3(1), (4)–(7), (10)
 - RRSP, to, 147.3(1), (4)–(7), (10)
 - registered disability savings plan, to, on death, 60.02
 - restrictions re, 147.3(12)
 - taxation of amount transferred, 147.3(9)
 - transfers to
 - actuarial surplus, of, 147.3(4.1), (7.1)
 - another RPP, from, 147.3, Reg. 8517
 - deferred profit sharing plan, from, 147(19)
 - via a trust, 104(27.1)
 - marriage breakdown, on, 147.3(5)
 - money purchase plan from money purchase plan, 147.3(7.1)
 - pension benefits received through trust, of, 60(j)(ii)
 - RRSP, from, 146(16)
 - retiring allowance, 60(j.1)
 - unregistered plan, from, 60(j)(i)
 - United States tax treatment of, *see* Qualifying retirement plan
 - variable benefits, Reg. 8506(1)(e.1)
 - wage measure, defined, 147.1(1)

Registered plan

- defined, 207.01(1)

Registered plan strip

- constitutes advantage, 207.01(1)“advantage”(d)
- defined, 207.01(1)
- 100% tax on, 207.05(2)(c)

Registered retirement income fund

- acceptance for registration, 146.3(2)
- administration fees, non-deductible, 18(1)(u)
- advantage, 207.01(1)“advantage”, 207.05
- amended
 - deemed receipt, 204.2(1.4)
- amounts received, income, 56(1)(t)
- annuitant
 - defined, 146.3(1)
 - emigration from Canada, no deemed disposition, 128.1(10)“excluded right or interest”(a)(ii)
- annuities, holding of, 146.3(1)“qualified investment”(b.1), (b.2)
- benefits taxable, 146.3(5)
- business carried on by, 146.3(3)(c)
- carrier, defined, 146.3(1)“annuitant”
- change in fund after registration, 146.3(11)–(13)
- common-law spouse, breakdown of relationship, 146.3(14)(a)
- death of last annuitant, 146.3(6)–(6.2)
 - carryback of losses, 146.3(6.3), (6.4)
- defined, 146.3(1), 248(1)
- depositary, 146.3(1)“carrier”(d)
 - conditions for registration, 146.3(2)(c)
 - exempt from tax on amounts added or earned, 146.3(15)
- designated benefit
 - amount deductible, 146.3(6.2)
 - deemed received, 146.3(6.1)
 - defined, 146.3(1)“designated benefit”
 - transfer of, to spouse, child or grandchild, 146.3(6.11)
- designation of charity as beneficiary, 118.1(5.2)(b)
- disposition of property to, capital loss nil, 40(2)(g)(iv)(A)
- eligible amount, 146.3(6.11)
- emigration of annuitant, no deemed disposition, 128.1(10)“excluded right or interest”(a)(ii)
- excessive small business property holding, tax, 207.1(5) (repealed retroactively)
- excluded from various trust rules, 108(1)“trust”(a)
- exempt from tax, 146.3(3), 149(1)(x)
- income accruing in
 - not taxed, 146.3(3), (15), 149(1)(x)
 - not taxed by U.S., Canada–U.S. tax treaty Canada–U.S. Tax Treaty:Art. XVIII:7
- income not subject to annual accrual, Reg. 7000(6)
- information returns, Reg. 215
- insurance corporation demutualization conversion benefit, 139.1(12), (14)
- interest income deemed not received by annuitant, 146.3(15)
- investment counselling fees, non-deductible, 18(1)(u)
- life income fund, treated as RRIF (no legislative provisions, *see* Notes to 147.3(1))
- locked-in annuities, 146.3(1)“qualified investment”(b.2)
- losses after death, 146.3(6.3), (6.4)
- minimum amount
 - defined, 146.3(1), Reg. 7308(3), (4)
 - for 2008, 146.3(1.1), (1.2)
 - for 2020, 146.3(1.4), (1.5)

- Registered retirement income fund (*cont'd*)
- recontribution due to reduced 2008 minimum, 60.021
 - recontribution due to reduced 2015 minimum, 60.022
 - requirement to pay out annually, 146.3(1)“retirement income fund”
 - non-qualified investment
 - defined, 146(1), 207.01(1)
 - tax on, 207.04
 - non-resident, payment to, 212(1)(q)
 - payments under
 - attributed to spouse, 146.3(5.1)
 - joint and several liability for tax on, 160.2(2)–(4)
 - non-resident, to, 212(1)(q)
 - election to file return, 217
 - taxable, 146.3(5)
 - withholding of tax, 153(1)(l), Reg. 103(4), 103(6)(d.1)
 - prohibited investment, tax on, 207.04
 - property
 - disposition or acquisition, 146.3(4)
 - transfer of, 146.3(14)–(14.2)
 - used as security, recovery of, 146.3(10)
 - “property held” in connection with the fund, 146.3(1)
 - qualified investment, defined, 146.3(1)
 - Quebec, in deemed to be trust, 248(3)(c)
 - recontribution of amounts withdrawn for 2015 when minimum amount reduced, 60.022
 - registration of, 146.3(2)
 - retirement income, defined, 146(1)
 - retirement income fund, defined, 146.3(1)
 - reversionary trust rules do not apply, 75(3)(a)
 - revocation of registration, 146.3(11)–(13)
 - rollover, *see see* transfer from; transfer to
 - services in respect of, non-deductible, 18(1)(u)
 - tax-paid amounts, *see* Tax-paid amount
 - tax payable by
 - on acquisition of shares not at fair market value, 207.1(5)
 - on non-qualified or prohibited investment, 207.04
 - transfer from
 - another RRIF, to, 146.3(2)(e)–(e.2), 146.3(14)(b)(i)
 - marriage breakdown, on, 146.3(14)(a)
 - money purchase RPP, to, 146.3(14.1)(b)
 - PRPP, to, 146.3(14.1)(a)
 - RRSP, to, 146.3(14)(b)(ii)
 - registered disability savings plan, to, on death, 60.02
 - spouse’s RRSP, to, on marriage breakdown, 146.3(14)(a)
 - transfer to
 - ALDA (advanced life deferred annuity), from, 146.3(2)(f)(ix)
 - amount to be included in income, 146.3(5.1)
 - another RRIF, from, 146.3(14)(b)(i)
 - balance of annuitized voluntary contributions, pre-10/9/86, 60.2(2)
 - deceased spouse’s RRSP, from, 60(1)
 - PRPP, from, 147.5(21)(c)(iv)
 - RPP, from, 146.3(2)(f)(v), (vi), 147.3(1), (4)–(7), (10)
 - RRSP, from 146(16), 146.3(5.1)
 - rules, 146.3(5.1)–(5.5)
 - trust, not taxed, 146.3(3), 149(1)(x)
 - withholding of tax, 153(1)(l), Reg. 103(4), 103(6)(d.1)
- Registered retirement savings plan**
- administration fees, non-deductible, 18(1)(u)
 - advantage, 207.01(1)“advantage”, 207.05
 - age 71 maturity, 146(2)(b.4)
 - amended plan, 146(12)
 - deemed receipt, 204.2(1.4)
 - payments out of, subject to withholding of tax, 153(1)(j)
 - amount deductible
 - excess premiums, 146(8.2)
 - deemed not premiums, 146(8.21)
 - amount included in computing income, 146(8.3)–(8.7)
 - amounts received from, income, 56(1)(h), 146(8)
 - annuitant
 - defined, 146(1)
 - emigration from Canada, no deemed disposition, 128.1(10)“excluded right or interest”(a)(i)
 - annuities, holding of, 146(1)“qualified investment”(c.1), (c.2)
 - annuity acquired or provided under, pre-Oct9/86
 - balance of annuitized voluntary contributions to RPP, 60.2(2)
 - attribution rule re payments from spousal plan, 146(8.3)
 - benefits from, 146(8)–(8.91)
 - rollover for financially dependent child, 60(1)(v)(B.01)
 - spousal plan, attribution to spouse, 146(8.3)
 - taxable, 146(8)
 - where plan not registered at end of year entered into, 146(15)
 - borrowing against,
 - income inclusion, 146(10)(b)
 - prohibited for depositary plan, 146(2)(c.3)(ii)
 - borrowing from
 - to finance education, *see* Lifelong Learning Plan
 - to purchase a home, *see* Home Buyers’ Plan
 - business carried on by, 146(4)(b)
 - change in, after registration, 146(12), (13)
 - common-law spouse, breakdown of relationship, 146(16)
 - contributions, *see* premiums (*below*)
 - cumulative excess amount re, 204.1(2.1), 204.2(1.1)
 - death, effect of, 146(8.8)–(8.91)
 - carryback of losses, 146(8.92), (8.93)
 - refund of premiums to child or grandchild, rollover to new RRSP, 60(1)(v)(B.1)
 - refund of premiums to spouse, child or grandchild, 146(1)“refund of premiums”
 - deduction limit, 146(1)“RRSP deduction limit”
 - defined, 248(1)
 - defined, 146(1), 248(1)
 - definitions, 146(1)
 - designation of charity as beneficiary, 118.1(5.2)(b)
 - disposition of property to, capital loss nil, 40(2)(g)(iv)(B)
 - dollar limit, 146(1)“RRSP dollar limit”
 - defined, 248(1)
 - emigration of annuitant, no deemed disposition, 128.1(10)“excluded right or interest”(a)(i)
 - excess amount for a year re, 204.2(1)
 - excess contributions
 - tax on, 204.1
 - withdrawal of, 146(8.2)
 - excessive small business property holding, tax, 207.1(5) (repealed retroactively)
 - excluded from various trust rules, 108(1)“trust”(a)
 - exempt from tax, 146(4), 149(1)(r)
 - Home Buyers’ Plan, *see* Home Buyers’ Plan
 - home mortgage as investment, Reg. 4900(1)(j)–(j.2)
 - income accruing in
 - not taxed, 146(4), 149(1)(r)
 - not taxed by U.S., Canada-U.S. Tax Treaty:Art. XVIII:8, XXIX:5
 - income not subject to annual accrual, Reg. 7000(6)
 - information returns, Reg. 214, 214.1
 - insurance corporation demutualization conversion benefit, 139.1(12), (14)
 - interest on money borrowed to invest in, not deductible, 18(1)(b)
 - investment counselling fees, non-deductible, 18(1)(u)
 - investment in small businesses, Reg. 4900(6), (12)
 - issuer extending advantage, 207.01(1)“advantage”
 - “issuer” of, defined, 146(1)
 - labour-sponsored venture capital corporation, 127.4(1)“qualifying trust”, 127.4(6)(a)

Index

- Registered retirement savings plan (*cont'd*)
- labour-sponsored venture capital corporation shares, acquisition of, 127.4(1)“qualifying trust”, (3)
 - life insurance policies, 146(11)
 - Lifelong Learning Plan, *see* Lifelong Learning Plan
 - losses after death, 146(8.92), (8.93)
 - maturity by age 71, 146(2)(b.4)
 - money borrowed to pay premium
 - limitation on interest deductibility, 18(11)(b)
 - mortgage as investment, Reg. 4900(1)(j)–(j.2)
 - net past service pension adjustment, meaning, 146(1)
 - non-qualified investment
 - defined, 146(1), 207.01(1)
 - tax on, 207.04
 - non-resident withholding tax, 212(1)(l)
 - overcontribution to
 - no deduction for, 146(5)
 - non-deductible, withdrawal of, 146(8.2)
 - tax on, 204.1(2.1)
 - transfer from RPP, deduction if withdrawn, 147.3(13.1)
 - payments under
 - joint and several liability for tax on, 160.2(1), (3), (4)
 - non-residents, to, 212(1)(l)
 - election to file return, 217
 - remuneration, Reg. 100(1)
 - taxable, 56(1)(h), 146(8), 212(1)(l)
 - withholding tax, 153(1)(j)
 - pledging assets of, *see* borrowing against (above)
 - premiums
 - amount deductible, 60(i), 146(5), (5.2), (6.1)
 - excess, refunded, deemed not premiums, 146(8.21)
 - minimum tax, 127.52(1)(a) [repealed]
 - paid before registration, 146(14)
 - refund of, on overcontribution, 146(8.2)
 - undeducted, 204.2(1.2)
 - prohibited investment, tax on, 207.04
 - property used as security for loan, recovery of, 146(7)
 - qualified investments of, 146(1), Reg. 4900
 - Quebec, in deemed to be trust, 248(3)(c)
 - recontribution of certain withdrawals, deduction for, 146(6.1)
 - refund of excess contributions, 146(8.2)
 - refund of premiums, 146(1)
 - deemed receipt of, 146(8.1)
 - defined, 146(1)
 - estate, to, 146(8.1)
 - transferred to annuity, RRSP or RRIF, 60(1)
 - registration of, 146(2), (3), (13.1)
 - change after, 146(12), (13)
 - retiring allowance, transfer to, 60(j.1)
 - reversionary trust rules do not apply, 75(3)(a)
 - rollover, *see* transfer from; transfer to
 - rules governing, 146
 - security, not to be used as, 146(2)(c.3)(ii)
 - services in respect of, non-deductible, 18(1)(u)
 - spousal plan, 146(8.3)
 - attribution on withdrawals, 146(8.3)
 - defined, 146(1)
 - premiums
 - amount deductible, 146(5.1)
 - not subject to income attribution rules, 74.5(12)
 - spouse
 - breakdown of relationship, on, 146(16)
 - transfer to, on death, 146(1)“refund of premiums”, 146(8.91)
 - tax on over-contributions to, 204.1
 - tax-paid amounts, *see* Tax-paid amount
 - tax payable by
 - on acquisition of shares not at fair market value, 207.1(5)
 - on non-qualified or prohibited investment, 207.04
 - termination at age 71, 146(2)(b.4)
 - transfer from
 - to ALDA (advanced life deferred annuity), 146(16)(a.1)
 - to another RRSP or RRIF, 60(1), 146(16)
 - amount to be included in income, 146.3(5.1)
 - rules, 146.3(5.1)–(5.5)
 - tracking of funds, 146(8.4)
 - to RDSP, on death, 60.02
 - to RPP, 146(16)(a)
 - transfer to
 - another RPP, from, 147.3
 - another RRSP, from, 146(16)
 - capital loss deemed nil, 40(2)(g)(iv)(A)
 - capital loss denied, 40(2)(g)(iv)(B)
 - DPSP, from, 147(19)(d)(i)
 - deceased person’s RRSP, from, 60(1)
 - PRPP, from, 147.5(21)(c)(iv)
 - pension benefits received through a trust, 60(j)(ii)
 - RPP, from, 147.3(1), (4)–(7), (10)
 - division of amount transferred, 147.3(11)
 - taxation of amount transferred, 147.3(10)
 - RRIF, from, 146.3(14)(b)(ii)
 - RRSP, from, 146(16)(a)
 - retiring allowance, 60(j.1)
 - spouse, for, on marriage breakdown, 147.3(5)
 - unregistered plan, from, 60(j)(i)
 - trust
 - disposition of property by, 146(9)
 - non-qualified investments acquired by, 146(10)
 - non-qualified investments held by
 - tax payable, 146(10.1)
 - not taxed, 146(4), 149(1)(r)
 - United States residents, deferral, Canada-U.S. Tax Treaty:Art. XVIII:7
 - United States retirement plan, deduction limit applies, 146(1)“unused RRSP deduction room”(b)D(ii), Canada-U.S. Tax Treaty:Art. XVIII:11
 - unused deduction room, meaning, 146(1)
 - withdrawal of funds for education, *see* Lifelong Learning Plan
 - withdrawal of funds to purchase home, *see* Home Buyers’ Plan
 - withholding on withdrawals of funds, Reg. 103(4)
- Registered securities dealer**, *see also* Broker; Investment dealer; Securities
- defined, 248(1)
 - securities lending arrangement payments to non-residents
 - information return required, 212(18)
 - tax on excessive payments, 212(19)
- Registered segregated fund trust**
- excluded from various trust rules, 108(1)“trust”(a)
- Registered supplementary unemployment benefit plan**
- amendment of, amounts received, 145(4)
 - benefits received, income, 56(1)(g)
 - defined, 145(1)
 - emigration of employee, no deemed disposition, 128.1(10)“excluded right or interest”(a)(xi)
 - employer’s contribution under, 20(1)(x), 145(5)
 - excluded from various trust rules, 108(1)“trust”(a)
 - reversionary trust rules do not apply, 75(3)(a)
 - rollover to new trust, 248(1)“disposition”(f)(vi)
 - trust not taxable, 145(2), 149(1)(q)
 - winding-up of, amounts received, 145(4)
- Registration**
- business, *see* Business Number
 - Canadian amateur athletic association, 248(1)“registered Canadian amateur athletic association”
 - appeal from refusal or revocation by Minister, 172(3), (4)
 - certificate in Federal Court, of tax owing to Crown, 223(3)
 - charity, *see* Registered charity: registration of
 - deferred profit sharing plan, 147(2)–(5), Reg. 1501

Registration (*cont'd*)

- education savings plan, 146.1(2), (4), (12)
- employees profit sharing plan, as DPSP, 147(3), (4)
- GST, *see* Business Number
- labour sponsored venture capital corporation, 204.81(1)
- multi-employer pension plan, Reg. 8510(7)
- national arts service organization, 149.1(6.4)
- appeal from refusal or revocation by Minister, 172(3), (4)
- pension plan, 147.1(2), (3), Reg. 8512(1)
- multi-employer plan, Reg. 8510(7)
- profit sharing plan, as DPSP, 147(2)
- registered education savings plan, *see* education savings plan (above)
- registered investment, deemed, 204.4(7)
- registered pension plan, *see* pension plan (above)
- registered retirement income fund, *see* retirement income fund (below)
- registered retirement savings plan, *see* retirement savings plan (below)
- retirement income fund, 146.3(2)
- retirement savings plan, 146(2), (3), (13.1)
- revocation of, *see* Revocation of registration
- tax shelter, 237.1, *see also* Tax shelter

Registration information

- defined, re disclosure of taxpayer information, 241(10)
- disclosure of, 241(4)(1)

Regular adjustment period

- defined, re indexed debt obligation, Reg. 7001(7)

Regular customers

- defined, for FAPI rules, 95(2.4)(b)

Regular eligible amount

- defined, for Home Buyers' Plan, 146.01(1)

Regulated foreign financial institution, *see* Offshore regulated bank**Regulated innovative capital**

- defined, 122.1(1)
- excluded in determining whether trust is SIFT trust, 122.1(1)“investment”(b)(ii)

Regulated Investment Company (U.S.)

- dividend paid to Canadian resident, Canada-U.S. Tax Treaty:Art. X:7(b)

Regulations

- definitions in, *Interpretation Act* s. 16
- failure to comply with, penalty, 162(7)
- incorporating material amended from time to time, 221(4)
- Income Tax, reproduced after the *Income Tax Act* and *Income Tax Application Rules*
- judicial notice to be taken of, 244(12)
- meaning, 248(1)
- provision for, 147.1(18), 214(13), 215(5), 221(1)
- publication of, in *Canada Gazette*, 221(2)
- reducing amount of non-resident withholding tax, 215(5)
- residents in Canada, re, 214(13)
- retroactive effect, limitation on, 221(2)
- whether binding on Her Majesty, 221(3)

Regulatory innovative capital, *see* Regulated innovative capital**Rehabilitative therapy**

- for hearing/speech loss, medical expense, 118.2(2)(1.3)

Reimbursement

- alimony or maintenance payments, 56(1)(c.2), 60(c.2)
- disability insurance top-up paid by employer, 8(1)(n.1)
- election to offset against outlay or expense, 12(2.2)
- housing loss, by employer, 6(19)–(22)
- included in income, 12(1)(x)
- prescribed amount, Reg. 7300
- inducements, 20(1)(hh)
- legal expenses of collecting salary etc., re

- included in employee's income, 6(1)(j)
- loss in value of home, for, 6(19)–(22)
- medical expenses, 118.2(3)(b)
- motor vehicle expenses, in respect of, 6(1)(b)(xi)
- payments as
- election re adjusted cost base, 53(2)(s), 53(2.1)
- petroleum/natural gas etc. royalties included in income, for, 80.2
- received by beneficiary of trust, or partner, 12(2.1)
- salary or wages, of, 8(1)(n)
- support payments, 56(1)(c.2), 60(c.2)

Reimbursement payment

- defined (re top-up disability payments), 8(1)(n.1)(i)

Reinsurance arrangement

- defined, 211(1)

Reinsurance commission

- defined, Reg. 1408(1)
- exclusion from matchable expenditure rules, 18.1(15)
- whether deductible, 18(9.02)

Reinsurance recoverable

- defined, Reg. 2400(1)

Reinsurance recoverable amount

- defined, Reg. 1408(1)

Reinsurance trust

- exemption from withholding tax, 212(9)(d)

Reinsurer

- sales commissions, excluded from matchable expenditure rules, 18.1(15)

Related, *see* Related persons**Related business**

- defined, for income-splitting tax, 120.4(1)
- income derived from, income-splitting tax, 120.4(1)“split income”(b)(ii), (c)(ii)(C)
- of charity
- defined, 149.1(1)
- revocation of registration for carrying on other business, 149.1(2)(a)

Related entity

- defined, for Common Reporting Standard, 270(1)

Related group, defined, 251(4)**Related persons**, *see also* Associated corporations

- deemed not to deal at arm's length, 251(1)(a)
- defined, 251(2)
- extensions to definition
- for butterfly transactions, 55(5)(e)
- for debt forgiveness rules, 80(2)(j)
- for financial institutions tax, 190.15(6)
- for foreign affiliates, 95(2.2)(b), 95(6)(a)(i)
- for loans to non-residents, 17(11), (11.1), (11.3)
- for transfer pricing, Canada-U.S. Tax Treaty:Art. IX:2

Related segregated fund trust, 138.1

- adjusted cost base of, 53(1)(l), 53(2)(q)
- application on qualifying disposition to trust, 107.4(3)(g)
- defined, 138.1(1)(a)
- minimum tax not payable by, 127.55(f)(i)
- rollover to new trust, 248(1)“disposition”(f)(vi)

Related transactions

- defined, for foreign tax credit, 126(7)

Relationship, defined, 251(6)

- for certain Part I.3 purposes, 181.5(6)

Relationship deposits

- defined, for FAPI of banks, 95(2.43)

Release or surrender, defined, 248(9)**Relevant assumption**

- defined, FAPI partnership rules, 93.1(6)(b)

Relevant authority, *see also* Competent authority

- defined
- for policy reserves in insurance business, Reg. 1408(1)
- for prescribed amount and recovery rate, Reg. 8006

Relevant contribution (re eligible funeral arrangement)

- defined, 148.1(1)

Relevant conversion benefit

- defined, for insurance demutualization, 139.1(16)(a)

Relevant criminal offence, *see also* Relevant offence

- causing person to be ineligible to manage charity, 149.1(1)“ineligible individual”(a)
- defined, 149.1(1)

Relevant entity

- defined, for residence of international shipping corporation, 250(6.02)

Relevant factor

- defined, 248(1)

Relevant financial institution

- defined, for interest deduction restrictions, 18.2(1)

Relevant financial statements

- defined, for uncertain-tax-treatment rules, 237.5(1)

Relevant foreign income or profits

- defined, for hybrid mismatch arrangement rules, 18.4(1), 113(3)

Relevant foreign tax law

- defined, for artificial foreign tax credit generator rules, 91(4.1)(a)(i), (ii), 126(4.11), Reg. 5907(1.03)(a), (b)

Relevant funder

- defined, for non-resident withholding tax back-to-back rules, 212(3.8)

Relevant funding arrangement

- defined, for non-resident withholding tax back-to-back rules, 212(3.8)

Relevant licensor

- defined, for non-resident withholding tax back-to-back rules, 212(3.94)

Relevant limit (re debt forgiveness rules, partnerships)

- defined, 80(15)(b)
- limitation on deduction to partner, 80(15)(a)

Relevant loss balance (for debt forgiveness rules)

- application of, 80(3), (4)
- defined, 80(1)

Relevant non-arm's length entity

- defined, for FAPI rules, 95(1)

Relevant offence, *see also* Relevant criminal offence

- causing person to be ineligible to manage charity, 149.1(1)“ineligible individual”(b)
- defined, 149.1(1)

Relevant period

- defined
- for alternative interest-deduction restrictions, 18.21(1)
- for non-resident withholding tax on back-to-back loans, 212(3.1)(c)

Relevant person

- defined
- for acquisition of control of corporation from SIFT, 256(7)(c.1)(i)
- for FAPI rules re services, 95(3.02)
- for FAPL (loss) rules, Reg. 5903(7), *see also* Relevant person or partnership
- for private foundations, 149.1(1)

Relevant person or partnership

- defined, for foreign accrual property loss, Reg. 5903(6)

Relevant proportion

- for carbon tax refund to farmers, 127.42(1)

Relevant province

- defined, for Climate Action Incentive, 122.8(4)A

Relevant provision

- defined
- FAPI partnership rules, 93.1(6)(a)
- trust transfer of farm/fishing property to settlor's children, 70(9.11)(c)

Relevant royalty arrangement

- defined, for non-resident withholding tax back-to-back rules, 212(3.94)

Relevant spot rate

- defined, for functional currency rules, 261(1)

Relevant tax factor (for FAPI)

- defined, 95(1)

Religious order, members' charitable gifts, 110(2)**Religious organization**, *see* Communal organization; Registered charity**Relocation**, *see also* Moving expenses

- counselling, *see* Counselling services
- eligible, *see* Eligible relocation
- reimbursement for loss of value of home, *see* Housing loss

Remainder interest, disposition of, *see* Life estate in real property**Remission orders**

- text of, reproduced after the *Income Tax Regulations*

Remittance of taxes withheld, *see also* Withholding

- deemed remitted on day received by Receiver General, 248(7)
- interference with, by secured creditor, 227(5.2)–(5.4) (1995 draft, abandoned)
- large employers must remit through financial institution, 153(1), Reg. 110
- exception, 153(1.4)
- new small employers, quarterly remittance, Reg. 108(1.13)
- over \$10,000, must be electronic, 160.5(2), 162(7.4)
- small employers, quarterly remittance, Reg. 108(1.12)
- source withholdings, Reg. 108
- unclaimed dividends and interest, 153(4), Reg. 108(4)

Remote work site, employment at, 6(6), *see also* Northern Canada**Remuneration**, *see also* Salary

- defined
- for Canadian film/video tax credit, Reg. 1106(1)“remuneration”
- for source withholdings, Reg. 100(1)
- information returns, Reg. Part II
- ranges of, Reg. Sch. I
- total
- defined, Reg. 100(1)
- unpaid, 78(4)
- withholding of tax on, 153(1)(a)
- failure to remit amounts withheld, 227(9.5)
- failure to withhold, 227(8.5)

Renewable energy, *see* Energy: renewable**Renovations**

- disability-related
- deductible, 20(1)(qq)
- medical expense credit, 118.2(2)(1.2)

Rent

- accrual of, to date of death, 70(1)(a)
- deduction for, 9(1)
- future period, for
- not “outlay” or “expense”, 66(15)“outlay” or “expense”
- income
- taxable, 9(1)
- whether specified investment business, 125(7)“specified investment business”
- meaning of, 18(1)(d) (Notes)
- non-resident withholding tax, *see* paid to non-resident (below)
- office, paid by employee, 8(1)(i)(ii)

Rent (*cont'd*)

- certificate of employer, 8(10)
- paid on depreciable property before acquisition, deemed CCA, 13(5.2)
- paid to non-resident, 212(1)(d), 212(13)
- alternative tax, 216
- re railway rolling stock, exemption, 212(1)(d)(vii)
- prepaid, non-deductible, 18(9)
- scientific research expenditures, limitations, 37(8)(d)(ii)
- subsidy, *see* Canada Emergency Rent Subsidy
- treaty rules, Canada-U.S. Tax Treaty:Art. VI

Rent from real or immovable property

- defined, for SIFT trust and partnership distributions, 122.1(1)

Rent subsidy percentage

- defined, for COVID-19 Canada Emergency Rent Subsidy, 125.7(1)

Rent top-up percentage

- defined, for COVID-19 Canada Emergency Rent Subsidy, 125.7(1)

Rental cost

- defined, Reg. 5202

Rental or leasing property

- defined, 127.52(3)
- minimum tax, 127.52(1)(b), (c)(ii)

Rental properties

- capital cost allowance, Reg. 1100(11)–(14.2), 1101(1ac)–(1ae)
- non-arm's length exception, Reg. 1102(20)
- defined, Reg. 1100(14)–(14.2)
- minimum tax, 127.52(1)(b), (c.2)(ii), 127.52(3)“rental or leasing property”

Renunciation, *see* Flow-through shares**Reorganization**, *see also* Amalgamation; Rollover; Winding-up

- butterfly, 55(3)(b)
- corporate, generally, 84–88
- divisive (butterfly), 55(3)(b)
- effect on stock options, 7(1.4), (1.5)
- mutual fund corporation or trust, 132.2
- of business, payment to shareholder deemed dividend, 84(2), (6)
- of capital, exchange of shares, 86(1); ITAR 26(27)
- property acquired in course of
 - capital cost allowance, Reg. 1100(2.2)
- registered pension plan, members transferred, Reg. 8500(9)
- treaty protection, Canada-U.S. Tax Treaty:Art. XIII:8

Repaid amount (tax shelter investment)

- defined, 143.2(10)

Repair

- automobile, *see* Automobile: operating costs

Repayment, *see also* Reimbursement

- amount previously included in income, 20(1)(m.2)
- application to other taxes, 164(2)
- employment insurance benefits, 60(n), (v.1)
- government assistance, *see* Assistance/government assistance: repayment of
- inducements, 20(1)(hh)
- overpayment of interest, by taxpayer, 164(3.1)
 - deduction for, 20(1)(ll)
- pension benefits, 60(j.04)
- policy loan, 60(s)
- Quebec Parental Insurance Plan benefits, 60(g)
- shareholder's loan, 20(1)(j)
- tax, *see* Refund

Repayment period

- defined, for Lifelong Learning Plan, 146.02(1)

Repeal

- legislation, *Interpretation Act* s. 25(1)
- regulations, *Interpretation Act* s. 31(4)

Replacement cost of property

- value of inventory, 10(4)

Replacement obligation

- corporation in financial difficulty, exemption from non-resident withholding tax, 212(3)

Replacement property, *see also* Exchanges of property

- defined
 - for capital property, 44(5)
 - for depreciable capital property, 13(4), (4.1)
 - for Home Buyers' Plan, 146.01(1)
- shares, *see* Replacement share
- taxable Canadian property
 - capital property, 44(5)(c), (d)
 - depreciable property, 13(4.1)(c), (d)

Replacement share

- defined, for small business investment capital gain rollover, 44.1(1)

Repo agreement, 260(1)“securities lending arrangement”**Reportable account**

- defined, for Common Reporting Standard, 270(1)

Reportable jurisdiction

- defined, for Common Reporting Standard, 270(1)

Reportable jurisdiction person

- defined, for Common Reporting Standard, 270(1)

Reportable person

- defined, for Common Reporting Standard, 270(1)

Reportable property

- defined, 128.1(10)
- reporting of, required, 128.1(9)

Reportable transaction

- mandatory disclosure rules
 - defined, 237.3(1)
 - information return required, 237.3(2)
 - filing by one person before 2022 constitutes filing by all, 237.3(4)
 - filing deadline, 237.3(5)
 - penalty for failure to file, 237.3(8), (8.1)
 - reassessment deadline 3 years after filed, 152(4)(b.5)
- transactions with non-residents
 - defined, 233.1(1)
 - information return required, 233.1(2), (3)

Reportable uncertain tax treatment

- defined, 237.5(1)
- requirement to report, 237.5(2)

Reported reserve (of insurer)

- defined, Reg. 1408(1)

Reporting corporation

- defined, for uncertain tax treatment rules, 237.5(1)
- required to report uncertain tax treatment, 237.5(2)

Reporting entity

- electronic funds transfer reporting
 - defined, 244.1
 - obligation to file, 244.2(1), 244.6
- foreign affiliate reporting
 - defined, 233.4(1)
 - obligation to file, 233.4(4)
- foreign property reporting
 - defined, 233.3(1)
 - obligation to file, 233.3(3)

Reporting financial institution

- defined, for Common Reporting Standard, 270(1)

Reporting fiscal year

- defined, for country-by-country reporting, 233.8(1)

Reporting of foreign owners of bank accounts, *see* Common Reporting Standard

Reporting partnership

- defined, re transactions with non-residents, 233.1(1)

Reporting person

- defined
- re transactions with non-residents, 233.1(1)
- re qualified investments, 221(1)

Reporting requirements, see Information return**Repossession of property**

- effect on creditor, 79.1
- capital gains reserve, 79.1(3)
- deemed cost of seized property, 79.1(6)
- foreign resource property, 79.1(2.1)
- in same taxation year as sale, 79.1(5)
- inventory reserve, 79.1(4)
- effect on debtor, 79

Representation allowances, not income, 6(1)(b)(iii), (iv)**Representation expenses**

- deductible, 20(1)(cc)
- deemed deducted as depreciation, 13(12)
- election to defer, 20(9), Reg. 4100

Representative

- of deceased taxpayer, *see* Legal representative of deceased taxpayer
- of government entity, defined, 241(10)
- of taxpayer, disclosure of information to, 241(5)

Representative of deceased taxpayer, see Legal representative of deceased taxpayer**Repricing of stock options, 110(1.7), (1.8)****Repurchase of shares, 260(1)**“securities lending arrangement”**Required statement**

- defined, Reg. 809(4)

Requirement, see Demand; Garnishment for taxes unpaid**Res judicata, 169(2)****Rescheduling of debt, expenses deductible, 20(1)(e)(ii.2), 20(1)(e.1)(iii)****Research and development, see** Scientific research and experimental development**Research grant**

- receipt of, income, 56(1)(o)
- refund of, 56(1)(p)
- repayment of, deductible, 60(q)

Reserve

- allowed, 20(1)(l)–(o)
- amalgamation, on, 87(2)(g), (i), (j)
- amount not due until later year, 20(1)(n)
- no deduction in certain circumstances, 20(8)
- bond premium, *see* unamortized bond premium (below)
- capital gain, 40(1)(a)(iii), 40(2)(a)
- donation to charity of non-qualifying security, 40(1.01)(c)
- disallowed in year of death, 72(1)(c)
- on exchange of property, 44(1)(e)(iii)
- where property repossessed by creditor, 79.1(3)
- contingent account, limitation on deductibility, 18(1)(e)
- corporation that is member of partnership, 34.2(11)
- credit unions, Reg. Part VI
- debt forgiveness, 61.2–61.4
- defined
- for capital gains, 40(1)(a)(iii)
- for large corporations tax, 181(1)
- for registered labour-sponsored venture capital corporations, 204.8(1)
- disallowed, 18(1)(e), 20(7)
- donation of non-qualifying security to charity, 40(1.01)(c)
- disallowed in year of death, 72(1)(c)
- doubtful debts, 12(1)(d), 20(1)(l)
- exchange of property, 44(1)(e)(iii)
- foreign exchange restriction, 91(2), (3)

- goods not delivered, 12(1)(e), 20(1)(m)
- guarantees etc., for, 12(1)(d.1)
- impaired debts, 20(1)(l)(ii)
- imputed to spouse on death of taxpayer, 72(2)
- insurance agent or broker, 32
- insurer, *see* Insurance corporation: policy reserves; Insurance corporation: reserve for unpaid claims
- inventory, 20(1)(n)
- where property repossessed by creditor, 79.1(4)
- life insurer's, 138(3)
- limitation on deductibility, 18(1)(e)
- manufacturer's warranty, 20(1)(l), (m), (m.1), (n), (o)
- maximum cumulative, of credit union, 137(6)“maximum cumulative reserve”
- negative, of insurer, 20(1)(e.1), 20(22), Reg. 1400(2)
- not deductible, 18(1)(e), 20(7)
- quadrennial survey, 12(1)(h), 20(1)(o), Reg. 3600
- qualifying transitional income (corporate partner), 34.2(11)
- reported (insurer), Reg. 1408(1)
- sectoral, defined, 20(2.3)
- services not rendered, 12(1)(e), 20(1)(m)
- transportation tickets, 20(6)
- unamortized bond premium, 20(1)(m.3)
- income inclusion in following year, 12(1)(d.2)
- undelivered food or drink, 20(6)
- unearned commissions, 32
- unpaid claims, *see* Insurance corporation: unpaid claims reserve adjustment
- unpaid insurance policy claims
- deduction, life insurance business, 138(3)(a)(ii)
- deduction, non-life insurance business, 20(7)(c)
- limitation, 18(1)(e.1)
- unrealized receivables, 20(1)(n)
- wind-up, on, 88(1)(e.1)
- year of death, not deductible for, 72(1)

Reserve adjustment

- life insurance corporations capital tax, 190.11

Reserve amount

- re resource property, defined, 66(15)

Reserve deficiency

- defined, Reg. 1403(8)(c)
- revision of policy lapse rates, Reg. 1403(8)–(10)

Reserve transition amount

- defined, for transitional accounting rules
- life insurer, 138(12)
- non-life insurer, 12.5(1)

Reservoir

- substances injected into, deduction for, 20(1)(mm)

Residence

- cost of maintaining after move, deduction, 62(3)(g)
- loss in value of, reimbursement, *see* Housing loss
- principal, *see* Principal residence

Resident beneficiary

- defined, 94(1)

Resident compensation

- defined, Reg. 8300(1)

Resident contributor

- defined, 94(1)

Resident of Canada

- absent from Canada
- child care, moving, and attendant expenses, 64.1
- becoming, *see* Becoming resident in Canada
- ceasing to be, *see* Ceasing to be resident in Canada
- corporate emigration, 219.1
- corporation, 250(4)
- deemed, 250
- for capital gains exemption, 110.6(5)

- Resident of Canada (*cont'd*)
- • tuition credit, 118.5(2)
 - defined, 250
 - • authorized foreign bank, 212(13.3)
 - • non-resident trust, 94(3)(a); *Income Tax Conventions Interpretation Act* s. 4.3
 - entitled to U.S. treaty benefits, Canada-U.S. Tax Treaty:Art. XXIX-A:2
 - extended meaning of, 250(1), (2)
 - former, *see* Former resident
 - former, deemed employed in Canada, 115(2)(c)
 - income earned in a province, Reg. 2601
 - liability for tax, 2(1)
 - ordinarily, meaning of, 250(3)
 - part-year, *see* Part-year resident
 - partnership, *Income Tax Conventions Interpretation Act* s. 6.2
 - person deemed not due to tax treaty, 250(5)
 - regulations re, 214(13)
 - returning, 128.1(6), (7)
 - short-term, 128.1(4)(b)(iv)
 - treaty purposes, Canada-U.S. Tax Treaty:Art. IV
 - trust, deemed, 94(3)(a); *Income Tax Conventions Interpretation Act* s. 4.3
- Resident portion (of trust)**
- defined, 94(1)
 - included in deemed-resident trust's income, 94(3)(f)(ii)
- Residential property**
- defined, for minimum tax purposes, 127.52(3)
 - partnership investing in
 - • capital cost allowance limitation, 127.52(2)
- Residential schools settlement**, *see* Indian Residential Schools Settlement trust
- Residual balance (upon debt forgiveness)**
- defined, 80(14)
 - included into income, 80(13)
- Residual portion (on disposition of specified debt obligation)**, *see also* Current amount (on disposition of specified debt obligation)
- application of, 142.4(4)
 - defined, 142.4(8)
 - • re disposition by financial institutions, Reg. 9200(1)
- Resman Holdings TCC case overruled**, 66.1(6)“Canadian exploration expense”(d)(i), 66.1(9)(a)
- Resource**
- defined, Reg. 1206(1)
 - mineral, *see* Mineral resource
- Resource activity**
- defined, for resource allowance claims, Reg. 1206(1)
- Resource allowance**, 20(1)(v.1) [repealed], Reg. 1210 [repealed]
- Resource expenses**, *see also* Canadian development expense; Canadian exploration expense; Canadian oil and gas property expense
- amounts recovered included in income, 59
 - Canadian development expenses, 66.2
 - Canadian exploration and development expenses, 66(1)
 - Canadian exploration expenses, 66.1
 - Canadian oil and gas property expenses, 66.4
 - change of control, rules, 66.7(10), (11)
 - flow-through shares, 66(12.6)–(12.74), *see also* Flow-through shares
 - flow-through to shareholder, 66(12.6), (12.62), (12.64)
 - foreign exploration and development expenses, 66(4)
 - joint exploration corporation, 66(10)–(10.4)
 - limited partner, at-risk rules, 66.8
 - minimum tax, 127.52(1)(e), (e.1)
 - partnership, of, 96(1)(d)
 - reduction of, on debt forgiveness, 80(8)
 - successor rules, 66.7
 - “warehousing” prohibited, 66(19)
- Resource income**
- manufacturing profits, Reg. 5203
- Resource profits**
- defined, Reg. 1204(1.1), 5202
- Resource property**
- Canadian, *see* Canadian resource property
 - carved-out income, *see* Carved-out income
 - deceased taxpayer's, 70(5.2)
 - disposition
 - • consideration for, on amalgamation, 87(2)(p)
 - • involuntary, 59.1
 - • reserve for uncollected amount
 - • • income in later year, 59(2)
 - expropriation, 59.1
 - foreign, *see also* Foreign resource property
 - • proceeds of disposition, 59(1)
 - partnership, of, 96(1)(d)
 - rules for trusts, 104(5.2)
 - timber, *see* Timber resource property
- Respiratory aids**
- medical expense, Reg. 5700(c), (c.1), (c.2)
- Respite care**, *see* Attendant; Nursing home
- Restaurant relief (COVID)**, Reg. 8901.1(2)(b)(ii), *see also* Qualifying tourism or hospitality entity
- Restricted farm loss**
- addition to adjusted cost base of land, 53(1)(i)
 - amalgamation, on, 87(2.1)
 - carryover of, 111(1)(c)
 - deduction by partner where partnership disposes of land, 101
 - defined, 31(1), (1.1), 111(9), 248(1)
 - determination of, by Minister, 152(1.1), (1.2), (1.3)
 - limitation on deductibility, 31(1), 111(3)
 - partnership, from, 96(1)
 - reassessment, 152(6)(c)
 - reduction of, on debt forgiveness, 80(3)(c)
- Restricted financial institution**, *see also* Financial institution; Taxable RFI share
- defined, 248(1)
 - dividends received on term preferred shares, 112(2.1)
 - receiving dividends on taxable RFI shares
 - • where shares acquired under securities lending arrangement, 260(9)
- Restricted financial institution (RFI) shares, taxable**
- tax on dividends received by restricted financial institution, 187.3
 - • information return, 187.5
 - • partnership, 187.4
- Restricted interest and financing expense**
- carryforward, 111(1)(a.1)
 - defined, 111(8), 248(1)
- Restricted investment**
- defined, for pooled registered pension plan, 147.5(1)
- Restricted property (for non-resident trust rules)**
- defined, 94(1), 94(14)
 - • deemed, on indirect transfer to trust, 94(2)(b)
 - determination of value when contributed to deemed-resident trust, 94(9)
 - FAPI on contribution of to certain trusts, 94.2(1)(b)(ii)
- Restrictive covenant (or non-competition payment)**
- allocation of price paid, 68(c)
 - defined, 56.4(1)
 - employment income from
 - • taxable when receivable after 3 years, 6(3.1)
 - income from
 - • deduction for bad debt, 60(f)
 - • • bad debt recovered, 56(1)(m)

- Restrictive covenant (or non-competition payment) (*cont'd*)
 - included in income, 56.4(2)
 - non-resident withholding tax, 212(1)(i), 212(13)(g)
 - succession planning exclusion, 56.4(7)
 - Restructuring of debt, expenses deductible**, 20(1)(e)(ii.2), 20(1)(e.1)(iii)
 - Retention of books and records**, 230(4), (4.1)
 - Retirement benefits**
 - defined, Reg. 8500(1)
 - while continuing employment (phased retirement), Reg. 8503(16)–(25)
 - Retirement compensation arrangement**
 - administration of, corporation exempt, 149(1)(o.1)(i)(B)
 - advantage, tax on, 207.5(1)“advantage”, 207.62
 - amount paid in respect of
 - withholding of tax, 153(1)(p)–(r)
 - amount payable under trust, not income, 12(1)(m)(ii)
 - amounts received by employer under, includable in income, 12(1)(n.3)
 - amounts transferred under, deduction from income, 60(j.1)
 - benefits under
 - deduction from income re, 60(t)
 - includable in income, 56(1)(x), (z)
 - not includable in employee’s income, 6(1)(a)(ii)
 - received by another
 - joint and several liability for tax on, 160.3
 - whether eligible for pension income splitting, 60.03(1)“eligible pension income”(b)(i)(A)
 - contribution to
 - tax on, 207.7(1)
 - withholding, Reg. 103(7)
 - creation of trust, 207.6(1)
 - deduction for contributions to
 - by employee, 8(1)(m.2), 60(t), (u)
 - by employer, 18(1)(o.2), 20(1)(r)
 - defined, 248(1), Reg. 6802
 - disposition of interest in
 - amount included in income, 56(1)(y)
 - deduction from income re, 60(u)
 - disposition of property by trust, 56(11)
 - distribution by trust, 107.2
 - emigration of employee, no deemed disposition, 128.1(10)“excluded right or interest”(a)(ix)
 - employee benefit plan becoming
 - deemed contribution, 207.6(4)
 - employer contribution deductible, 20(1)(r)
 - excluded from non-resident trust rules, 94(1)“exempt foreign trust”(e)
 - failure to withhold amounts in respect of, 227(8.2)
 - foreign plan, *see* Foreign plan (pension plan)
 - incorporated employee carrying on personal services business, 207.6(3)
 - life insurance policies, 207.6(2)
 - Member of Parliament, Reg. 6802.1
 - money borrowed to make employee contributions
 - limitation on interest deductibility, 18(11)(e)
 - non-resident compensation plan not retirement compensation arrangement
 - exception re “resident’s arrangement”, 207.6(5)
 - payment of tax, 207.7(3)
 - pension income credit not available, 118(8)(e), (f)
 - pension income splitting on income from, 60.03(1)“eligible pension income”(b)(i)(A)
 - portion of benefits taxable, 56(1)(a)(i)
 - prescribed plan or arrangement, 207.6(6), Reg. 6802
 - prohibited investment, tax on, 207.5(1)“advantage”, 207.61
 - purchase price of interest in, paid by non-resident, 212(1)(j)
 - refund of tax, 207.7(2)
 - refundable tax, 207.5–207.7
 - defined, 207.5(1)
 - election re, 207.5(2)
 - resident’s arrangement, 207.6(5)
 - resident’s contribution, defined, 207.6(5.1)
 - reversionary trust rules do not apply, 75(3)(a)
 - severability of plan, 56(10)
 - subject property
 - defined, 207.5(1)
 - tax payable
 - advantage, 207.62
 - waiver of tax, 207.64
 - prohibited investment, 207.61
 - waiver of tax, 207.64
 - refundable tax, 207.7(1)
 - transfer to another RCA, 207.6(7)
 - no withholding, Reg. 103(7)(a)
 - trust
 - corporation administering, exempt, 149(1)(o.1)(i)(B)
 - creation of, 207.6(1)
 - defined, 207.5(1)
 - exempt from tax, 149(1)(q.1)
 - withholding tax, 153(1)(p)–(r), Reg. 103(7)
- Retirement counselling**, *see* Counselling services
- Retirement income, defined**, 146(1)
- Retirement income fund**, *see also* Registered retirement income fund
 - registration of, 146.3(2)
 - appeal from refusal, 172(3)(g), 180
 - deemed refusal by Minister, 172(4)(f)
 - revocation of, 146.3(11)–(13)
 - services relating to, non-deductible, 18(1)(u)
- Retirement payment**
 - single, from deferred profit sharing plan, 147(10.1), (10.2), Reg. 1503
- Retirement savings plan**, *see also* Registered retirement savings plan
 - appeal from refusal to register, 172(3)(b), 180
 - deemed registered, when, 204.2(3)
 - defined, 146(1)
 - foreign, *see* Foreign retirement arrangement
 - registration of, 146(2), (3)
 - deemed refusal by Minister, 172(4)(b)
 - services relating to, non-deductible, 18(1)(u)
- Retiring allowance**
 - defined, 248(1)
 - emigration, no deemed disposition of right, 128.1(10)“excluded right or interest”(d)
 - income, 56(1)(a)(ii)
 - legal costs of collecting or establishing right to
 - deduction for, 60(o.1)
 - income when recovered, 56(1)(l.1)
 - paid to non-resident, 212(1)(j.1)
 - election to file return, 217
 - repayment of, deductible, 60(n)(iii)
 - spread retroactively over prior years, 110.2, 120.31
 - transferred to RRSP or RPP, 60(j.1)
 - unpaid, 78(4)
 - withholding tax, 153(1)(c), Reg. 103(4), (6)(e)
- Retroactive effect**, *see also* Grandfathering
 - of amendments to pre-RSC 5th Supp. Act, ITAR 79
 - of interest, to date of effect of amendment, 221.1
 - of regulations, to date of public announcement, 221(2)
- Retroactive legislation**
 - GAAR amendments, 245(4)
 - GST disallowed as moving expense, 62(3)(f)
- Retroactive lump-sum payment**, *see* Lump-sum payment
- Retrospection**, ITAR 17(4)

Return of income

- defined
- for GST Credit, 122.5(1)
- for OAS clawback, 180.2(1)
- for teacher school-supplies credit, 122.9(1)

Returned property

- from charity to donor, 110.1(16), 118.1(27), Reg. 3501.1

Returning former resident, 128.1(6), (7)**Returns, see also Information return**

- alternative to withholding tax, 216(1), 217
 - amended, 152(6)
 - bankrupt individual, 128(2)(e), (f)
 - carved-out income, tax on, 209(3)
 - corporation, 150(1)(a)
 - electronic filing mandatory, 150.1(2.1), (2.3)
 - death of beneficiary, 104(23)(d)
 - death of partner or proprietor, 150(4)
 - deceased taxpayer, 150(1)(b), (e)
 - deferred income plans
 - over-contributions, 204.3
 - property held by, 207.2
 - demand for, by Minister, 150(2)
 - designated persons, 150(1)(e)
 - due date, 150(1)
 - electronic filing of, 150.1
 - mandatory, 150.1(2.1), (2.3)
 - employee's declaration, 227(2)
 - when to be filed, Reg. 107
 - where not filed, 227(3)
 - estates, 150(1)(c)
 - estimate of surtax, 180.1
 - estimate of tax, 151
 - excessive eligible dividend designation, 185.2(1)
 - extension of time for filing, 220(3)
 - failure to file, penalty
 - demand by Minister, 150(2)
 - penalty, 162(1)
 - repeated, 162(2)
 - trustees etc., 162(3)
 - false
 - penalty for, 163(2)
 - "understatement of income", 163(2.1)
 - films, Reg. 225
 - guardian, etc., 150(1)(d), (e)
 - home insulation program, Reg. 224
 - incomplete, penalty, 162(5)
 - individual, 150(1)(d), (e)
 - in bankruptcy, 128(2)(e)
 - information, *see* Information return
 - late filing, penalty, 162(1)
 - Minister not bound by, 152(7)
 - non-profit organization, 149(12)
 - omission in, penalty, 163(2)
 - Part I, 150
 - Part I.2, 180.2(5)(a)
 - Part I.3, 181.6
 - Part II, 183(1)
 - Part II.1, 183.2
 - Part III.1, 185.2(1)
 - Part IV, 187(1)
 - Part IV.1, 187.5
 - Part V, 189(6), (6.1)
 - Part VI, 190.2
 - Part VI.1, 191.4
 - Part IX, 196(2)
 - Part IX.1, 197(4), (5)
 - Part X, 202(1)
 - Part X.1, 204.3
 - Part X.2, 204.7
 - Part X.3, 204.86
 - Part X.4, 204.92
 - Part XI.01, 207.07(1)
 - Part XI.1, 207.2
 - Part XI.2, 207.4
 - Part XI.3, 207.7(3)(a)
 - Part XI.4, 207.8(5)
 - Part XII.1, 209(3)
 - Part XII.2, 210.2(5)
 - Part XII.3, 211.2
 - Part XII.4 (qualifying environmental trust), 211.6(3)
 - Part XII.5, 211.8(2), 211.82
 - Part XII.6, 211.91(2)(a)
 - Part XIII.1, 218.2(5)
 - Part XIII.2 (optional), 218.3(3)–(9)
 - Part XIV, 219(3)
 - proof of, 244(17)–(19)
 - public authorities (Part XI.2), 207.4
 - refunds not payable until all filed, 164(2.01)
 - registered investment, 204.7
 - repeated failures to report an amount of income, penalty for, 163(1)
 - required of employee, 227(2)
 - where not filed, 227(3)
 - separate
 - amounts receivable on death, 70(2)
 - bankrupt individual, 128(2)(e), (f)
 - death of beneficiary, 104(23)(d)
 - death of partner or proprietor, 150(4)
 - off-calendar year adjustment, 34.1(9)
 - deductions in computing taxable income, 114.2
 - minimum tax carryover not applicable, 120.2(4)
 - minimum tax not applicable, 127.55
 - tax credits, 118.93
 - trustees etc., 150(3)
 - failure to file, penalty for, 162(3)
 - in bankruptcy, 128(2)(e)
 - trusts, 150(1)(c)
 - understatement of income, 163(2.1)
- Revenue Canada, *see* Canada Revenue Agency
- Revenue guarantee
 - creates tax shelter, Reg. 3100(1)(b)(ii)
- Revenue reduction percentage
 - defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)
- Reverse attribution, 74.5(11)
- Reverse takeover, 256(7)(c)–(c.2)
- Reversionary trust, 75(2), (3)
 - non-resident trust, 94(8.1), (8.2)
- Reversionary year
 - defined, for functional currency rules, 261(1)
- Revised Statutes of Canada, 1985 (5th Supp.)
 - amendments to previous Act, ITAR 79
 - continuity of previous versions of Act, ITAR 75, 77
 - effective dates, ITAR 73
- Revocable living trust
 - excluded from qualifying disposition, 107.4(1)(e)
- Revocable plan
 - defined
 - for DPSP, 147(21), Reg. 8408(2)
 - for PRPP, 147.5(3), (4)
 - for RPP, 147.1(8), (9), 147.3(12), Reg. 8301(14)(a), 8305(2)(a), 8408(2), 8501(2), 8503(11), (15), 8506(4), 8511(2), 8515(9)
- Revocable trust, 75(2), (3)

- Revocation of Canadian film/video production certificate**, 125.4(6)
- Revocation of designation**
- as qualified Canadian journalism organization, 168.1(2), (3)
- Revocation of elections**, 220(3.2)
- COVID-19 Canada Emergency Wage Subsidy and Canada Emergency Rent Subsidy, 125.7(10)
 - election by mutual fund trust for December 15 year-end, 132.11(1.1)
 - election to trigger capital gains exemption, 110.6(25)
- Revocation of film/video production services certificate**, 125.5(6)
- Revocation of registration**, *see also* Notice of intent
- amateur athletic association, 149.1(4.2), 168
 - appeal from, 172(3), 180(1), 204.81(9)
 - charity, 149.1(4.1), 168, 188, 188.1
 - deferred profit sharing plan, 147(14)–(15)
 - education savings plan, 146.1(12.1), (12.2), (13), (14)
 - labour-sponsored venture capital corporation, 204.81(6)–(9)
 - national arts service organization, 149.1(6.5)
 - pension plan, 147.1(11)–(13)
 - pooled registered pension plan, 147.5(24)–(28)
 - profit sharing plan, 147(14)–(15)
 - qualified donee, 149.1(4.3), 168
 - retirement income fund, 146.3(11)–(13)
 - retirement savings plan, 146(12)
- Revocation tax, charities**, 188
- Revoked corporation (registered labour venture capital)**
- defined (RLSVCC), 204.8(1), 211.7(1)
- Revoked plan**, *see* Deferred profit sharing plan
- Rider**
- deemed to be separate life insurance policy
 - • for insurer’s reserves, Reg. 1408(5), (6)
 - • when added to pre-1990 policy, 12.2(10)
- Riding horses**
- eligible for children’s fitness credit, Reg. 9400(5)
- Right of use or habitation (Quebec)**
- deemed to be trust, 248(3)
- Right to receive an amount**
- cost amount of, 248(1)“cost amount”(e)
- Right to receive production**
- deduction of matchable expenditure prorated, 18.1(4)
 - defined, 18.1(1)
 - disposition of, income inclusion, 12(1)(g.1), 18.1(6)
- Right to reduce**
- defined, for limitations on contingent expenditures, 143.4(1)
- Rights**
- exchange of, on amalgamation, 87(4.3)
- Rights or things**
- acquired by beneficiary
 - • deemed cost, 69(1.1)
 - exclusions, 70(3.1)
 - transferred to beneficiaries, 70(3)
 - value of, included in income at date of death, 70(2)
- Rights to drill or explore**, *see* Exploration and drilling rights
- Rights to income**
- transfer of, 56(4)
- River improvements**
- capital cost allowance, Reg. 1102(7)
- River rafting relief (COVID)**, Reg. 8901.1(2)(b)(ix)(A)(V), *see also* Qualifying tourism or hospitality entity
- Road**, *see also* Specified temporary access road
- capital cost, 13(7.5)(b), Reg. 1102(14.3)
- Roadways**
- capital cost allowance, Reg. Sch. II:Cl. 1(g), Sch. II:Cl. 17
 - • for mine, Reg. Sch. II:Cl. 10(l), Sch. II:Cl. 41
- **Robinson case overruled**, 253.1(1)
 - **Rocking bed, as medical expense**, 118.2(2)(i)
 - **Rockmore Investments case overruled**, 125(7)“active business carried on by a corporation”
 - **Rogers Enterprises case paras. 46–49 overruled**, 245(1)“tax benefit”(c)
 - **Roller skating rink floor**, Reg. Sch. II:Cl. 10(i)
 - **“Rolling start” rule**, 13(27)(b), 13(28)(c), 13(29)
 - **Rollout**
 - from trust, 107(2)
 - on partnership ceasing to exist, 98(3)
 - **Rollover**, *see also* Transfer of property
 - accounts receivable, 22
 - amalgamation, on, 87
 - bare trust, to or from, 248(1)“disposition”(e)(i)
 - convertible debentures, 51
 - convertible property, 51
 - corporation, to, 85(1)
 - • by partnership, 85(2)
 - • capital property, 85(1)(c.2)
 - • depreciable property, 85(1)(c)
 - • farming inventory, 85(1)(c.2)
 - • from shareholder, 85(1)
 - • • eligible property, 85(1.1)
 - • • inventory, 85(1)(c.1)
 - • • wholly-owned corporation, 85(1)(e.2), 85(1.3)
 - death, on
 - • registered retirement savings plan, 60(1)(v)(B.1), 146(8.8)–(8.91)
 - • to registered disability savings plan, 60.02
 - • to spouse or spouse trust, 70(6), (6.1)
 - debt, in settlement of commercial debt obligation, 80(2)(h)
 - demutualization of insurance corporation, 139.1(4)(a), (d)
 - distress preferred share, converted to or from debt, 80.02(3)–(5)
 - effect on shares held by former resident of Canada, 128.3
 - exchange of property, 13(4), (4.1), 44
 - exchange of shares, 51(1)
 - exchange of shares on reorganization of capital, 86
 - farm property, of, 70(9)–(9.31), 73(3)–(4.1)
 - farming inventory, transfer to corporation, 85(1)(c.2)
 - fishing property, of, 70(9)–(9.31), 73(3)–(4.1)
 - foreign share for foreign share exchange, 85.1(5), (6)
 - foreign spin-off, 86.1
 - insurance business, 138(11.5), (11.94)
 - insurer policyholder’s rights, on demutualization, 139.1(4)(a), (d)
 - internal reorganization, 86
 - life insurance policy
 - • to child, 148(8)
 - • to spouse
 - • • inter vivos, 148(8.1)
 - • • on death, 148(8.2)
 - mark-to-market property prohibited, 85(1.1)(g)(iii)
 - mutual fund trust or corporation, 132.2
 - net income stabilization account/NISA Fund No. 2
 - • to corporation, 85(1)(c.1), 85(1.1)(i)
 - • to spouse or spouse trust, 70(6.1)
 - non-resident insurance business, of, 138(11.5)
 - parent, to
 - • on death of individual, 70(9.6)
 - • on wind-up of corporation, 88(1)
 - partnership, from
 - • to new partnership, 98(1)
 - • to partners on windup, 98(3)
 - • to proprietorship, 98(5)
 - partnership, to, 97(2)
 - qualifying disposition to a trust, 107.4

Rollover (*cont'd*)

- registered disability savings plan, to, on death, 60.02
- registered education savings plan, investment income to RDSP, 146.1(1.1), (1.2)
- registered pension plan to RPP annuity, 147.4
- registered retirement savings plan, on death, 60(l)(v)(B.1), 146(8.8)–(8.91)
- reorganizations, 84–88
- replacement property, 13(4), (4.1), 44
- reserves for year of death, 72(2)
- retiring allowance, to RRSP, 60(j.1)
- rights or things transferred to beneficiary, 69(1.1)
- SIFT units exchanged for shares of corporation, 85.1(7), (8)
- share for share exchange, 85.1
- shareholder, from, to corporation, 85(1)
 - • eligible property, 85(1.1)
- small business investments, 44.1
- spouse or spouse trust, to
 - • death, on, 70(6), (6.1)
 - • inter vivos, 73(1)
 - • life insurance policy
 - • • *inter vivos*, 148(8.1)
 - • • on death, 148(8.2)
 - • registered retirement savings plan, 146(8.8)–(8.91)
- stock options, of, on corporate reorganization, 7(1.4), (1.5)
- taxable Canadian property, 85(1)(i)
- transaction, *see* Rollover transaction
- transfer of insurance business by non-resident insurer, 138(11.5)
- treaty protection, Canada-U.S. Tax Treaty:Art. XIII:8
- trust, from
 - • to beneficiary, 107(2)
 - • to new trust, 107.4, 248(1)“disposition”(e), (f)
- trust, to, 107.4
- winding-up, on, 88(1)
- winding-up of partnership, on, 98(3)

Rollover period

- defined, re death of TFSA holder, 207.01(1)“exempt contribution”(a)

Rollover transaction, *see also* Rollover

- acquisition of specified debt obligation by financial institution, 142.6(5)
- defined, 142.6(6)

Roofer

- apprenticeship job creation credit, 127(9)“investment tax credit”

Roth IRA

- conversion from regular ITA, whether taxable in Canada, 56(12), Canada-U.S. Tax Treaty:Art. XVIII:7
- included in definition of pension, Canada-U.S. Tax Treaty:Art. XVIII:3(b)
- not subject to non-resident trust rules, 94(1)“exempt foreign trust”(h)(ii)(D)

Rounding of amounts

- Child Tax Benefit, 122.61(7)
- inflation indexing, 117.1(3)
- pension calculations, Reg. 8311
- TFSA, 207.01(1)“TFSA dollar limit”(d)

Rousseau-Houle case overruled, 34.2, 245(4)**Rowboats**

- capital cost allowance, Reg. Sch. II:Cl. 7

Royal Assent

- amendments in force, *Interpretation Act* s. 6(3)

Royal Canadian Mint, subject to tax, 27(2), Reg. 7100**Royal Canadian Mounted Police**, *see also* Police officer

- disability pension exempt, 81(1)(i)
- provision of charity information to, for security purposes, 241(9), (9.1)

Royalties

- accrual to date of death, 70(1)(a)
- based on production or use, income, 12(1)(g)
- copyright, paid to non-resident, exempt, 212(1)(d)(vi)
- Crown, *see* Crown royalty
- defined, Canada-U.S. Tax Treaty:Art. XII:4, 6
- income from
 - • whether specified investment business, 125(7)“specified investment business”
- motion picture films, paid to non-residents, 212(5)
- paid to non-resident, 212(1)(d)
 - • back-to-back royalties, 212(3.9)–(3.94)
 - • to U.S. resident, Canada-U.S. Tax Treaty:Art. XII
- paid to trust for non-resident, exemption, 212(9)(b)
- petroleum, natural gas, minerals
- reimbursement for, 80.2
- prepaid, non-deductible, 18(9)
- production, defined, Reg. 1206(1)
- timber, 212(1)(e)
 - • alternative tax, 216

Runway, *see* Aircraft: runway**S****S corporation**, *see* United States: S corporation**SBB**, *see* Small business bond**SBDB**, *see* Small business development bond**SBITC**, *see* Small business investment tax credit**SCI**, *see* Specified corporate income**SDA**, *see* Salary deferral arrangement; Synthetic disposition arrangement**SDO**, *see* Specified debt obligation**SDSP**, *see* Specified disability savings plan**SEA**, *see* Synthetic equity arrangement**SEP**, *see* Surplus entitlement percentage**SERP**, *see* Supplemental employee retirement plan**SHT**, *see* Specified hedging transaction**SIB**, *see* Specified investment business**SIFT**, *see* Specified investment flow-through**SIFT partnership**, *see also* SIFT trust

- defined, 197(1), (8), 197.1, 248(1)
- distributions to partners
 - • taxed in partnership at corporate rate, 197(2)
 - • how taxed at partnership level, 96(1.11)
- instalments of tax, 157(1), 197(6)
- required to file information return, Reg. 229
- required to file Part IX.1 partnership distributions tax return, 197(4)
- requirement to post income information on CDS Innovations website, Reg. 229.1(2)

SIFT partnership balance-due day

- defined, 248(1)

SIFT trust, *see also* SIFT partnership

- conversion to corporate form, *see* SIFT wind-up entity
- defined, 122.1(1), (2), 248(1)
- distributions to unitholders
 - • deemed to be taxable dividend, 104(16)
 - • reduced deduction to trust, 104(6)(b)B(ii)
 - • taxed in trust at corporate rate, 122(1)(b)
 - • • not taxed provincially, 120(3)(d)
- instalments of tax, 157(2)
- province of residence, Reg. 2608
- requirement to post income information on CDS Innovations website, Reg. 204.1(2)

SIFT trust wind-up event, *see also* SIFT wind-up entity

- deemed settlement of debt, 80.01(5.1)
- defined, 248(1)
- no Part XIII.2 tax, 218.3(1)“assessable distribution”

- SIFT trust wind-up event (*cont'd*)
 - wind-up into corporation, 88.1
 - other wind-up, 107(3), (3.1)
- SIFT wind-up corporation**
 - amalgamation of, 87(2)(s.1)
 - defined, 248(1)
- SIFT wind-up entity**
 - defined, 248(1)
 - exchange of employee stock options, 7(1.4)(b)(vi)
 - rollover on exchange of units for shares before 2013, 85.1(7), (8)
 - wind-up into corporation, 88.1
 - other wind-up, 107(3), (3.1)
- SIFT wind-up entity equity**
 - defined, 248(1)
- SIN**, *see* Social insurance number
- SLA compensation payment**
 - deductibility, 260(6)
 - defined, for securities lending arrangement, 260(1)
- SNQII**, *see* Specified non-qualified investment income (of registered plan)
- SPDRs**, *see* Standard & Poor 500 Depositary Receipts
- SPI**, *see* Specified participating interest
- SPTC**, *see* Share-purchase tax credit
- SR&ED**, *see* Scientific research and experimental development
- SR&ED form**
 - defined, 162(5.3)
 - no deduction if prescribed information not provided, 37(11.1)
 - requirement to disclose claim preparer information on, 37(11)(b)
 - penalty for not disclosing, 162(5.1)
- SR&ED qualified expenditure pool**
 - defined, 127(9)
 - investment tax credit for, 127(5)(a)(i), (ii)(A), 127(9)“investment tax credit”(a.1), (f)
 - additional, for Canadian-controlled private corporation, 127(10.1)(b)
 - transfer to other taxpayer, 127(13)–(17)
- SRA**, *see* Specified retirement arrangement
- SRTC**, *see* Scientific research tax credit (expired)
- SSHRC**, *see* Social Sciences and Humanities Research Council
- Sabbatical arrangement**, Reg. 6801(a)
 - COVID-19 relief for 2020–22, Reg. 6801.1
 - effect on pension plan, Reg. 8508
 - exemption for recontributed amount received from plan, 81(1)(s)
- Sabel Investments case overruled**, 160(5)(a)
- Safe harbour capital return**
 - defined, for income-splitting tax, 120.4(1)
- Safe income**, 55(5)(b), (c)
 - effect of, 55(2)
- Safe-income determination time**
 - defined, 55(1)
- Safety deposit box**
 - no deduction for use of, 18(1)(l.1)
- Salaries and Wages**, *see* Salary
- Salary**, *see also* Office or employment; Salary or wages
 - accrued to date of death, 70(1)(a)
 - defined, 248(1)
 - for manufacturing and processing credit, Reg. 5202
 - garnishment of, *see* Garnishment for taxes unpaid
 - legal expenses of collecting or establishing right to, 8(1)(b)
 - paid by employee, to assistant or substitute, 8(1)(i)(ii)
 - certificate of employer, 8(10)
 - reimbursement of, 8(1)(n)
 - tax to be withheld from, 153(1)(a)
 - failure to withhold, 227(8.5)
 - unpaid, 78(4)
- Salary deferral arrangement**
 - benefit from, income, 56(1)(w)
 - deduction to employer, 20(1)(oo), (pp)
 - limitation, 18(1)(o.1)
 - defined, 248(1)
 - emigration or immigration, no deemed disposition, 128.1(10)“excluded right or interest”(a)(vii), (b)
 - forfeited amounts
 - deductible from income, 8(1)(o)
 - includable in employer’s income, 12(1)(n.2)
 - inclusion in income from employment, 6(1)(a)(v), 6(1)(i), 6(11), (12), (14)
 - exception for non-residents, 6(13)
- Salary deferral leave plan**, Reg. 6801(b), Reg. 8508
- Salary or wages**
 - defined, 248(1)
 - re Canadian film/video tax credit, 125.4(1)
 - re film/video production services credit, 125.5(1)
 - journalist or editor, refundable credit, 125.6
 - taxable, 5(1)
- Sale**
 - accounts receivable, 22
 - bond, by conversion, 51.1
 - business, of, *see also* Ceasing to carry on business; Rollover
 - taxation year-end, 25(1)
 - to corporation for shares, 85(1)
 - to partnership, 97(2)
 - to spouse or controlled corporation, 24(2)
 - defined, for information returns on securities transactions, Reg. 230(1)
 - depreciable property, *see* Capital cost allowance: recapture; Depreciable property
 - mortgage included in proceeds of disposition, 20(5), (5.1)
 - shares, not at arm’s length, 84.1
 - by non-residents, 212.1
- Sales suppression software**, *see* Zapper software (or hardware)
- Sales tax, federal**, *see* Federal sales tax credit
- Salesperson**
 - automobile
 - reasonable standby charge for use of, 6(2.1)
 - automobile or aircraft
 - capital cost allowance, 8(11)
 - deemed, 13(11)
 - costs, deduction, 8(1)(j), 8(9)
 - expenses, deduction, 8(1)(f)
 - certificate of employer, 8(10)
 - limitation, 8(4)
- Same-sex marriage**, *see also* Common-law partner
 - religious charity entitled not to perform, 149.1(6.21)
- Same-sex partner**, *see* Common-law partner
- Sand**, 248(1)“mineral”
 - tar, *see* Tar sands, defined; Tar sands ore
- Saskatchewan**, *see also* Province
 - labour-sponsored venture capital corporation of
 - prescribed, Reg. 6700(a)(iv), (ix)
 - northern, *see* Northern Canada
 - Pension Plan, *see* Specified pension plan
 - prescribed stock savings plan, Reg. 6705(b)
 - tax rates, *see* introductory pages
- Saskatchewan Pension Plan**, *see* Specified pension plan
- Satisfaction of obligation**
 - deemed not to be disposition, 49.1
- Savings and credit unions**, 137

Scale, metric, for retail use

- capital cost allowance, Reg. Sch. II:Cl. 10(p)

Scholarship

- employer-provided, whether taxable, 6(1)(a)(vi)
- receipt of, income, 56(1)(n)
- exemption, *see* Scholarship exemption
- refund of, 56(1)(p)
- repayment of, deductible, 60(q)
- reportable on information return, Reg. 203

Scholarship exemption, 56(3), (3.1)

- defined, 56(3), (3.1)
- exempt from tax, 56(1)(n)(ii)
- not for post-doctoral students, 118.6(1)“qualifying educational program”
- only if scholarship intended to support studies, 56(3.1)(a)
- part-time students, limited to cost of program and materials, 56(3.1)(b)

School

- attendance at, child care deduction, *see* Secondary school

School board

- allowance from, exempt, 81(3) [before 2019]
- exempt from tax, 149(1)(c)

School fees, *see* Tuition fees**School supplies credit, *see* Teacher school-supplies credit****School trustee**

- expense allowance exempt, 81(3) [before 2019]

Schooling allowance, provincial tax reduction, 120(2)**Scientific research and experimental development**

- assistance, *see* Assistance/government assistance
- available-for-use rules, 37(1.2), 248(19)
- buildings
- do not qualify as R&D expenditure, 37(8)(d)(i), Reg. 2900(11)
- Canadian employees outside Canada, 37(1.4), (1.5)
- claim preparer information, *see* Claim preparer information (SR&ED claim)
- contracted out to non-arm’s length person, 127(9)“qualified expenditure”(f)
- transfer of investment tax credit, 127(13)–(16)
- credit for, *see* investment tax credit (below)
- debt forgiveness, effect of, 37(1)(f.1)
- deduction for, 37
- amount included in income, 12(1)(v)
- defined, 37(8), (13), 248(1), Reg. 2900(1)
- election to use proxy amount for overhead, 37(8)(a)(ii)(B), 37(10), Reg. 2900(4)
- expenditure pool, *see* SR&ED qualified expenditure pool
- expenditures, 37(1)–(2), Reg. 2900(2)–(4)
- change of control, 37(1)(h)
- computation, 37(6.1)
- deduction for, 37(1), (2)
- election for alternative calculation, 37(8)(a)(ii)(B), 37(10)
- excluded, 37(8)(d)
- on amalgamation, 87(2)(1)–(1.2)
- stock options, whether excluded, 143.3
- filing deadline, 37(11), 220(2.2)
- financial institution, by, 248(1)“scientific research and experimental development”
- form required, *see* SR&ED form
- investment tax credit
- basic 20% credit, 127(9)“investment tax credit”(a.1)
- extra 15% credit, 127(10.1)
- refundable, 127.1
- linked work, 37(13), Reg. 2900(1)(d)
- meaning of, 37(9)(a)
- overhead expenses, election for prescribed proxy amount
- calculation of prescribed proxy amount, Reg. 2900(4)–(10)

- exclusion of proxy amount from expenditure pool, 37(8)(a)(ii)(B)
- filing of election, 37(10)
- investment tax credit, 127(9)“qualified expenditure”
- partnership, of
- no carryforward, 96(1)(e.1)
- no losses for passive partners, 96(1)(g)
- performed outside Canada, 37(1.4), (1.5), (2)
- pilot plants, qualify for investment tax credits, Reg. 2900(11)(c), (d)
- prescribed form required, 37(11), 127(9)“investment tax credit”(m)
- provincial super-allowance, 127(9)“super-allowance benefit amount”
- proxy amount, prescribed, Reg. 2900(4)
- reduction in, 127(11.1)(f) [repealed], 127(18)
- qualified expenditure
- defined, 127(9)
- prescribed, Reg. 2902
- subsidiary’s, on winding-up, 88(1.4)
- related corporations, of, 37(1.1)
- rent for buildings, does not qualify as R&D expenditure, 37(8)(d)(ii)
- salaries, directly engaged in SR&ED, Reg. 2900(4)
- sole-purpose R&D performer, Reg. 2902(a) (closing words)
- specified employee, paid to, 37(9.1)–(9.5)
- stock option cost, whether disallowed, 143.3
- super-allowance, 127(9)“super-allowance benefit amount”
- third party payment, 37(1)(a)(i.1), (ii), (iii)
- exclusion from prepaid expense rules, 18(9)(d)(i)

Scientific research and experimental development financing contract

- defined, 194(6), 248(1)

Scientific research corporation (non-profit)

- annual information return, 149(7)
- exemption for, 149(1)(j), 149(2)
- rules as to control, 149(8)
- rules as to income, 149(9)

Scientific research tax credit (expired), 127.3**Scott case (1975) overruled, 64.1****Scow, capital cost allowance, Reg. Sch. II:Cl. 7****Screenwriter (for Canadian film/video tax credit)**

- principal, whether Canadian, Reg. 1106(8)(c)

Script material

- defined, for Canadian film tax credit, 125.4(1)

Sculptor, *see* Artist**Sculpture, *see also* Cultural property; Listed personal property**

- Canadian, CCA claims allowed, Reg. 1102(1)(e)

Search-and-rescue volunteer

- exemption from employment income, 81(4)
- tax credit if performs 200 hours per year, 118.06(2)

Search warrant

- compliance required, 231.5(2)
- issue of, 231.3(1)–(4)

Second affiliate, *see* Foreign affiliate: second affiliate**Second instalment base**

- of corporation, 157(4), Reg. 5301(2)

Second term shared-use-equipment, for R&D investment tax credit

- defined, 127(9)

Second-tier financing structures

- application of FAPI, 95(6)

Secondary adjustment (transfer pricing), 247(12)–(16)**Secondary earner exemption (Canada Workers Benefit), 122.7(1.3)****Secondary recovery method, defined, Reg. 1206(1)**

Secondary school

- attendance at, child care deduction, 63(2)(b)(iii), 63(2.2)(a)

Secrecy provision, 241**Secretarial services**

- no application of penalty for misrepresentation, 163.2(9)

Secretary, *see* Officer: corporation, of**Section 160 avoidance planning**

- defined, 160.01(1)
- penalty for, 160.01(2)

Sectoral reserve

- defined, 20(2.3)

Secured creditor

- defined, 224(1.3)
- garnishment of property of, 224(1.2)
- interference with taxpayer's remittances, 227(5.2)–(5.4) (1995 draft, abandoned)
- withholding tax, liability for, 227(5), (5.1)(h)

Securities

- amalgamation, acquired in, 87(2)(e.2)
- Canadian, *see* Canadian security
- dealer, trader or agent, *see also* Broker; Registered securities dealer
 - fees of, deduction for, 20(1)(e), (bb)
 - ineligible for Canadian securities election, 39(5)(a)
 - return re securities lending arrangements and non-residents, 212(18)
 - tax re interest paid under securities lending arrangements to non-residents, 212(19)
- fair market value, ITAR 26(11)
- lending arrangements, *see* Securities lending arrangement
- prescribed, Reg. 6200
- publicly-traded, Reg. 4400
- V-day values, Reg. Sch. VII
- received for income debt, 76
- small business, Reg. 5100(2)
- transactions
 - information returns, Reg. 230
- used or held in insurance or moneylending business
- “eligible property” for transfer to corporation by shareholder, 85(1.1)(g)

Securities lending arrangement, 260, *see also* Dividend rental arrangement

- amount received deemed to be a dividend, 260(4)–(7)
- anti-avoidance rule, *see* Specified hedging transaction
- compensation payment
 - deductible, conditions, 260(6)
 - defined, 260(1)“SLA compensation payment”
 - no deduction generally, 18(1)(w)
- deemed dividend, 260(5)
- dividend refund, 260(7)
- no deduction for, 260(6)
- deemed not disposition, 260(2)
- defined, 260(1)
- disposition of right under, 260(3), (4)
- dividend compensation payment
 - deemed to be eligible dividend, 260(1.1), (5)
 - non-deductible, 18(1)(w)
- lender non-resident, effect, 260(8)
- non-resident withholding tax
 - amounts deemed to be interest, 260(8)
 - special tax on securities dealers, 212(19)
 - return required, 212(18)
- qualified security, defined, 260(1)
- restricted financial institution receiving dividend on shares acquired under, 260(9)
- specified, *see* Specified securities lending arrangement

Security, *see also* Securities

- defined

- for Part I.3 large corporation tax, Reg. 8605(4)
- for stapled-security rules for SIFT trusts, 18.3(1)
- for winding-up rules, 88(1) opening words
- granting of, not a disposition, 248(1)“disposition”(j), (k)
- non-qualifying, *see* Non-qualifying security
- qualified, *see* Qualified security

Security distribution

- defined, 260(1)

Security for tax, 220(4)–(4.4)

- defined, *Interpretation Act* 35(1)
- departure tax, 220(4.5)–(4.71)
- discharge, Reg. Part XXII
- extends 10-year collection limitation period, 222(8)(b)
- taxpayer becoming non-resident, 220(4.5)–(4.71)

Security interest

- defined
 - for garnishment rules, 224(1.3)
 - for thin capitalization rules, 18(5)

Seeing Eye dog, *see* Guide dog expenses**Segregated fund (of life insurer)**

- defined, 138.1(1), 211(1), Reg. 1408(1)
- merger of, 138.2
- related, *see* Related segregated fund trust
- rules re, 138.1
- trusts, 138.1
 - election, Reg. 6100
 - interest in, adjusted cost base, 53(1)(l), 53(2)(q)

Segregated fund policies

- defined, 138.1(1)(a)

Seismic testing

- off-the-shelf data, no renunciation of cost of, 66(12.6)(b.1)

Seizure

- chattels, of, 225
- documents, of, 231.3(5)–(8)
 - compliance required, 231.5(2), 232(15)
 - copies, 231.5(1)
 - where privilege claimed, 232(3), (4)–(7)
- property, for non-payment of debt
 - effect on creditor, 79.1
 - deemed cost of property, 79.1(6)
 - foreign resource property, 79.1(2.1)
 - no deduction for principal portion of bad debt, 79.1(8)
 - effect on debtor, 79

Select Luxury Items Tax, *see* Luxury Items Tax**Self-benefit trust**, *see* Alter ego trust**Self-contained domestic establishment, defined**, 248(1)**Self-employed person**

- Canada Pension Plan contributions, credit, 118.7:B(c)
- home office expenses, conditions for deductibility, 18(12)

Selling cost, *see* Adjusted selling cost (re investment tax credits)**Senate Appointment Consultations Act**

- candidates and parties under
 - political contribution credit, 127(3)
 - records re monetary contributions, 230.1
- nominee under
 - political contribution credit, 127(3)
 - records re monetary contributions, 230.1

Senegal

- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(g) [repealed]

Senior citizen, *see* Age**Separate business**

- deemed
 - for CCA, life and non-life insurance businesses, Reg. 1101(1a)

Separate business (*cont'd*)

- for FAPI, 95(2)(a.1)(iii), (a.2)(iv), (a.3)(iii), (a.4)(iii), (b)(i), (b)(ii), (k)(i)

- separate CCA classes for each business, Reg. 1101(1)

Separate classes for capital cost allowance, Reg. 1101

- automobile costing over \$24,000, Reg. 1101(1af)
- buildings, Reg. 1101(1ac)–(1ae), (5b), (5b.1)
- Canadian film or video production, Reg. 1101(5k.1)
- certified productions, Reg. 1101(5k)
- combustion turbines, Reg. 1101(5t)
- computer equipment and software, Reg. 1101(5p), 1103(2g)
- computer software tax shelter property, Reg. 1101(5r)
- computer tax shelter property, Reg. 1101(5r)
- deemed depreciable property, 13(5.2)(c), 13(21.2)(e)(ii), Reg. 1101(5g)
- different businesses, properties for, Reg. 1101(1)
- different mines, properties for, Reg. 1101(4a)–(4d)
- excavating or moving equipment, Reg. 1101(5l)
- exempt properties, Reg. 1101(5o)
- fax machine, Reg. 1101(5p), 1103(2g)
- industrial mineral mines, Reg. 1101(4)
- leasehold interest in real property, Reg. 1101(5h)
- leasing properties, Reg. 1101(5c), (5n)
- life insurance and other insurance business, Reg. 1101(1a)
- manufacturing and processing property, Reg. 1101(5s)
- mine property, Reg. 1101(4g), (4h)
- outdoor advertising sign, Reg. 1101(5l)
- partnership and non-partnership property, Reg. 1101(1ab)
- photocopier, Reg. 1101(5p), 1103(2g)
- pipeline costing over \$10,000,000, Reg. 1101(5i), (5j)
- railway assets, Reg. 1101(5d)–(5e)
- rental and non-rental property, Reg. 1101(1ae)
- scientific research expenditures, 37(6)
- software, Reg. 1101(5p), 1103(2g)
- telecommunication spacecraft, Reg. 1101(5a)
- telephone equipment, Reg. 1101(5p), 1103(2g)
- timber limits and cutting rights, Reg. 1101(3)
- vessels, Reg. 1101(2), (2a), (2b)
- conversion cost, 13(14), (17)

Separate return, *see* Returns: separate**Separate school board**, *see* School board**Separated organics**

- defined, Reg. 1104(13)
- gas produced by, Reg. 1104(13)“biogas”

Separation agreement

- defined, 248(1)
- payments under
- deductible by payor, 60(b), (c)
- taxable to recipient, 56(1)(b), (c)

Series

- of shares, 248(6)
- of transactions, 248(10)

Servant

- defined, 248(1)“employment”

Service

- proof of, 244(5), (6)

Service animal

- medical expense credit, 118.2(2)(1)

Service cost, *see* Adjusted service cost (re investment tax credits)**Service pension**

- exemption, 81(1)(d)
- other country, from, 81(1)(e)

Services

- defined, for FAPI, 95(3)
- not rendered, reserve for, 20(1)(m), 20(24), (25)
- provision of, along with property disposed of
- allocation rule, 68

- rendered, amounts receivable for, 12(1)(b), 12(2)
- to be rendered
- amount received for, income, 12(1)(a)(i), 12(2)
- repayment of, deductible, 20(1)(m.2)
- consideration for, not “outlay” or “expense”, 66(15)“outlay” or “expense”

Servitude

- ecologically sensitive land, value when donated, 110.1(5), 118.1(12)
- valuation applies for capital gains purposes, 43(2)

Set-off

- debt owing by Crown, against taxes owing, 224.1
- communication of information to facilitate, 241(4)(d)(xiii)
- interest, on instalment payments, 161(2.2)
- refund of tax, against other debt owing to Crown or province, 164(2)
- Part X refunds, 203
- transfer pricing adjustments, *see* Transfer pricing capital setoff adjustment; Transfer pricing income setoff adjustment

Set-top box, *see* Television set-top box**“Settled” (debt)**

- deemed, 80.01
- defined, 80(2)(a)
- for distress preferred shares, 80.02(2)(c), 80.02(7)(a)

Settlement, structured, *see* Structured settlement**Settlement of debt**, *see also* Debt forgiveness

- deemed, 80.01
- on amalgamation, 80.01(3)
- on debt becoming statute-barred, 80.01(9)
- on debt parking, 80.01(6)–(8)
- on share ceasing to be distress preferred share, 80.02(7)
- on winding-up, 80.01(4)
- distress preferred share, on winding-up, 80.01(5)
- effect of, 80(3)–(13)
- foreign affiliate’s gain or loss on, 95(2)(i)
- simultaneous, 80(2)(i)
- subsequent payment following deemed settlement, 80.01(10)

Settlement of litigation

- property transfer, 49.1
- Tax Court appeal, 169(3)
- wrongful dismissal, 248(1)“retiring allowance”

Settlor (of trust)

- defined, 108(1)
- for loan by corporation to non-resident, 17(15)
- reported to CRA starting 2022, Reg. 204.2(1)(a)

Severance pay, *see* Retiring allowance**“Shall”**

- meaning of, *Interpretation Act* s. 11

Share

- acquired before 1976
- cost base, deductions from, 53(2)(e)
- acquisition of
- by corporation, deemed dividend, 84(3), (6)
- deemed, 256(8)
- “actual cost”, ITAR 26(15)–(17)
- agreement to issue, to employees, 7(1)
- average annual rate of return, capital gains deduction, 110.6(9)
- bankrupt corporation, of
- deemed disposition of, 50(1)
- block of, defined, Reg. 4803(1)
- bought back by corporation
- amount paid for unpaid dividends deemed dividend substitute, 183.1(4)
- cancellation, deemed dividend, 84(3), (6)
- capital property, deemed, 39(4)
- capital stock of family farm corporation, of, 110.6(1)“share”
- capital stock of family fishing corporation, of, 110.6(1)“share”

Share (*cont'd*)

- class of, series of, 248(6)
- common, defined, 248(1)
 - for mutual fund rollover rules, 132.2(2)
- controlled corporation, of
 - disposition of, 40(2)(h)
- convertible, exchanged for other shares, 51; ITAR 26(24)
- cost base of
 - additions to, 53(1)(b)–(d), (f.1)
 - deductions from, 53(2)(a)
 - deemed dividend added to, 53(1)(b)
- deemed benefit from
 - cost base, addition to, 53(1)(j)
- deemed disposition of, to corporation, 84(9)
- deemed interest on, 258(5)
- deemed receipt of, on merger, 87(1.1)
- defined, 248(1)
 - for insurance demutualization, 139.1(1)
 - for non-resident corporation with no share capital, 93.2(2)
- disposition of
 - capital gain or loss, 40(1)
 - deemed, on death, 70(5)
 - for insurance demutualization, 139.1(1)
 - order of, for employee stock option benefit, 7(1.3)
 - subsequent to debt forgiveness, deemed capital gain, 80.03(2), (4)
 - where dividend previously paid, stop-loss rules, 112(3)
- distribution of, by corporation, 84(5)
- donation of or donation after sale of, capital gain exempted, 38(a.1)
- “equity” defined, 204
- exchanged for shares, 85.1; ITAR 26(26)
 - amalgamation, on, 87(4.1), (4.2)
 - computation of paid-up capital, 85.1(2.1)
 - reorganization of capital, 86(1); ITAR 26(27)
 - rules, 7(1.5), 112(7)
- “excluded” defined, 204
- expense of issuing, 20(1)(e)
- exploration and development, 66.3(1)
- fair market value, ITAR 26(11.1), (11.2)
- flow-through, 66(12.6)–(12.75), Reg. 6202.1
- foreign affiliate, of, *see also* Foreign affiliate
- fractional interest, *see* Fractional share
- grandfathered
 - defined, 248(1)
- guaranteed, *see* Guaranteed shares
- held by trustee for employee, 7(2)
- included in single payment under DPSP, 147(10.1), (10.2)
 - deduction re amount, 110(1)(d.3)
 - disposal of, 147(10.4), (10.5)
- interest paid on money borrowed to purchase, 20(1)(c)
- issued in exchange for property, rollover, 85(1)
- issued in settlement of debt, 80(2)(g), (g.1)
- issued to avoid tax, by foreign affiliates, 95(6)(b)
- loan to shareholder/employee to purchase, 15(2.4)(c)
- loss on, 112(3), (3.1), (3.2), (4.3)
- mark-to-market rules, *see* Mark-to-market property
- non-arm’s length sale of, 84.1
 - by non-resident, 212.1
- non-capital property of partnership
 - loss on, 112(4.2)
- “non-participating, defined, 204” “non-participating share”
- non-resident corporation, of
 - cost base, deductions from, 53(2)(b)
- not capital property
 - fair market value of, 112(4.1)
 - loss on, 112(4)
- paid-up capital in respect of class of, 84.2
 - paid-up capital value, defined, 204
 - payment for, no capital cost allowance, 18(1)(y)
 - predecessor corporation, on amalgamation, 87(4)
 - preferred, *see also* Preferred share; Term preferred share
 - deemed interest on, 258(3)
 - defined, 248(1)
 - prescribed, Reg. 6201–6207
 - flow-through, Reg. 6202.1
 - publicly-traded, Reg. 4400
 - V-day value, Reg. Sch. VII
 - purchase of
 - through series of transactions/events
 - tax on distribution of corporate surplus, 183.1(4)
 - trustee, by, for employees of corporation, 7(6)
 - qualified small business corporation
 - capital gains deduction, 110.6(2.1)
 - defined, 110.6(1)
 - related person, 110.6(14)
 - rules re, 110.6(14)
 - received on amalgamation, ITAR 26(21)
 - redemption, deemed dividend, 84(3), (6)
 - registered charities, held by, 189(3)–(5)
 - right to acquire
 - shares deemed owned, where, 95(6)(a)
 - sale of
 - non-arm’s length, 84.1
 - short-term preferred, defined, 248(1)
 - specified shareholder’s
 - adjusted cost base, 53(1)(d.3)
 - subsidiary, of
 - cost of, 52(7)
 - tax-deferred preferred, amalgamation where, 83(7)
 - taxable preferred, *see* Taxable preferred share
 - term preferred, *see* Term preferred share
 - value, whether deductible to issuer, 143.3(3)
 - where deemed capital property, 54.2
- **Share for share exchange, 85.1**
- **Share of the capital stock of a family farm or fishing corporation**
 - defined, 70(10)
 - rollover to children/grandchildren, 70(9)–(9.31), 73(3)–(4.1)
- **Share-funding arrangement (registered pension plan), Reg. 8501(6.1)**
- **Share options**
 - employee, 7
 - where person ceases to be employee, 7(4)
- **Share-purchase tax credit, 127.2, 192–193 [expired]**
- **Share repurchase transaction, anti-avoidance rule, 112(5.2)B(a)**
- **Share transfer fees, deduction, 20(1)(g)**
- **Shared-custody parent, *see also* Splitting, sharing or apportionment**
 - defined
 - for Canada Child Benefit, 122.6
 - for GST Credit, 122.5(3.01)
 - division of Canada Child Benefit, 122.61(1.1)
 - division of Climate Action Incentive (carbon tax credit), 122.8(4.1)
 - division of GST/HST Credit, 122.5(3.01)
 - division of Universal Child Care Benefit, *UCCB Act* s. 4(1)(a) [see Notes to 56(6)]
 - is eligible individual for Canada Child Benefit, 122.6 “eligible individual”
- **Shared-use-equipment**
 - defined, 127(9)
- **Shareholder**
 - appropriation of property to, 15(1), 69(4), (5), 84(2)
 - automobile available to, 15(5), (7)

- Shareholder** (*cont'd*)
- benefit from corporation, 15(1), (7), (9)
 - • GST portion included, 15(1.3)
 - • loan forgiven, 15(1.2)
 - deemed disposition of share to corporation, 84(9)
 - defined, 248(1)
 - exchange of shares in course of reorganization, 86(1)
 - issue of stock rights to, 15(1)(c)
 - loan to, by corporation, *see* Loan: shareholder, to, by corporation
 - non-resident
 - • interest paid to, not deductible, 18(4)–(6)
 - persons connected with, 15(2.1), 80.4(8)
 - prospective
 - • benefit conferred on, by corporation, 15(1)
 - share for share exchange, 85.1
 - specified
 - • adjusted cost base of share, 53(1)(d.3)
 - • defined, 248(1)
 - transfer of property by, to corporation, 85(1), (1.1)
- Shareholder corporation**
- “agreed portion” in respect of, 66(15)
 - defined, 66(15)
 - election by joint exploration corporation to renounce expenses to, 66(10)–(10.3) [repealed]
 - payment made to joint exploration corporation
 - • reduction in adjusted cost base of property received as consideration, 53(2)(f)
- Shareholder loan**, *see* Loan: shareholder to, by corporation
- Shareholder’s equity**
- determination of, for LSVCC investment shortfall, 204.82(2.2)(b), (c)
- Sharing**, *see* Splitting, sharing or apportionment
- Sheep**
- basic herd maintained since 1971, deduction, 29
 - breeding, 80.3(1)“breeding animals”
- Sheet metal worker**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Sheitel**, *see* Wig, medical expense
- Shelf, continental**, *see* Continental shelf
- Shell Canada case overruled**, 20.3
- Shellfish**, *see* Ammonite gemstone
- Shelter**, *see* Tax shelter
- Sherman case overruled**, 127.531(b)
- Sherway Centre case overruled**, 20(1)(e)(iv.1)
- Ship**, *see also* Vessel
- non-resident’s income from, exempt, 81(1)(c)
 - operators, taxable income earned in a province, Reg. 410
 - treaty provisions, Canada-U.S. Tax Treaty:Art. VIII:1–3, Canada-U.S. Tax Treaty:Art. XV:3, XXIII(3)
 - used in international traffic, *see* International traffic
- Shipping**, *see* International shipping
- Shoes/boots**
- orthopaedic etc., medical expense, Reg. 5700(e)
- Shopping**, *see* Treaty shopping
- Short-form amalgamation**, 87(1.1), (2.11)
- Short sale**
- dividend paid on borrowed securities not deductible, 260
- Short taxation year**
- causes
 - • becoming or ceasing to be CCPC, 249(3.1)
 - • becoming or ceasing to be exempt, 149(10)
 - • becoming or ceasing to be financial institution, 142.6(1)
 - • change in control of corporation, 249(4)
 - • charity given notice of revocation, 188(1)
 - • reduction in (foreign affiliate) surplus entitlement percentage, 91(1.1)–(1.5)
 - inclusion of FAPI, 91(1), (1.1)
 - prorating of base level deduction, 18(2.5)(b)
 - prorating of capital cost allowance, Reg. 1100(3)
 - prorating of deduction for injection substances, 20(1)(mm)(iii)
 - prorating of farmer’s animal valuation rules, 28(1.3)
 - prorating of financial institutions capital tax, 190.1(2)
 - prorating of ITC expenditure limit, 127(10.6)(b), (c)
 - prorating of Part VI.1 tax dividend allowance, 191.1(6)(a)
 - prorating of refundable investment tax credit, 127.1(4)
 - prorating of resource deductions, 66(13.1)
 - prorating of small business deduction, 125(5)(b)
 - prorating of tax on investment income of life insurer, 211.1(4)
 - • instalments, 211.3(2)A(b)
- Short-term preferred share**
- defined, 248(1)
- Shower**
- mechanical aid for getting into and out of, medical expense, Reg. 5700(g)
- Shutdown of business**, *see* Ceasing to carry on business; Winding-up
- Sickness and accident insurance**
- benefits taxable, 6(1)(f); ITAR 19
 - employee contributions to employee life and health trust deemed to be premiums if identified as such, 144.1(10)
 - employer’s contribution a taxable benefit, 6(1)(e.1)
- Sidewalks, capital cost allowance**, Reg. Sch. II:Cl. 1(g)
- for mines, Reg. Sch. II:Cl. 10(l)
- Siemens-OSRAM spinoff**, Reg. 5600(h)
- Sift trust**, *see* SIFT trust [at beginning of “S” listings]
- Sight impairment**
- devices to assist person with, business expense, 20(1)(tr)
- Sightseeing tours relief (COVID)**, Reg. 8901.1(2)(b)(vi), *see also* Qualifying tourism or hospitality entity
- Sign language**
- interpretation service
 - • disability supports deduction, 64(a)A(ii)(A)
 - • medical expense credit, 118.2(2)(1.4)
 - • training, medical expense credit, 118.2(2)(1.3)
- Signalling device**
- visual or vibratory, for person with hearing impairment, Reg. 5700(q.1)
- Significant interest**
- corporation, in a partnership
 - • defined, 34.2(1)
 - debt settlement rules
 - • defined, 80.01(2)(b)
 - financial institutions
 - • defined, 142.2(2), (3)
 - • financial institution holding, excluded from mark-to-market rules, 142.2(1)“mark-to-market property”(d)
 - pooled registered pension plan rules
 - • defined, 147.5(30)
 - RCA
 - • defined, 207.01(4), 207.5(1)
 - registered plan advantage rules
 - • defined, 207.01(4)
- Significant part of exempt capital gain attributable to unpaid dividends**, 110.6(8)
- Significant reduction in capital gain resulting from dividend**, 55(2)
- Signing bonus**, 6(3), 115(2)(c.1), 115(2)(e)(v)
- athlete or artist, Canada-U.S. Treaty Art. XVI:4
- Signs, outdoor advertising**, *see* Outdoor advertising structures
- Sildenafil case confirmed**, 15(2.4)(e)
- Silica, included in definition of “mineral”**, 248(1)

- Silicon Graphics Ltd. case overruled**, 95(1)“controlled foreign affiliate”(b), 125(7)“Canadian-controlled private corporation”(b)
- Silver**, *see* Precious metals
- Simser case offset by deduction**, 64
- Simultaneous**
- dividends, designation of order, 89(3), 133(7.2)
 - settlement of debt obligations, designation of order, 80(2)(i)
- Singapore**, *see also* Foreign government
- stock exchange recognized, 262
- Singer**
- deduction from employment income, 8(1)(q)
- Single amount**
- defined
 - for pooled registered pension plans, 147.5(1)
 - for registered pension plans, 147.1(1)
- Single mine property**
- capital cost allowance, Reg. 1100(1)(y.2)
 - separate prescribed class, Reg. 1101(4g)
- Single purpose corporation**
- whether use of corporate property taxable to shareholder, 15(1)
- Single status, credit for**, 118(1)B(c)
- Single-tier alignment**
- defined (for corporate inclusion of partnership income), 34.2(1)
 - election by partnership, 249.1(8)
- Singular includes plural**, *Interpretation Act* s. 33(2)
- Sister**
- deemed not related on butterfly transaction, 55(5)(e)
 - dependent, 118(6)(b)
 - includes sister-in-law or in common-law, 252(2)(c)
 - sharing of RESP assets, 204.9(5)(c)(ii)
- Site, investigation of**, 20(1)(dd)
- Siwik case overruled**, 80.4(1.1)
- Six employees test**
- FAPI active business, 95(1)“investment business”(c)(i), (ii)
 - personal services business, 125(7)“personal services business”(c)
 - specified investment business, 125(7)“specified investment business”(a), (b)
- Ski operators relief (COVID)**, Reg. 8901.1(2)(b)(ix)(A)(II), *see also* Qualifying tourism or hospitality entity
- Skytrain trusts**
- anti-avoidance rule, 106, 108(1)“income interest”
- Sleighs**
- capital cost allowance, Reg. Sch. II:Cl. 10(d)
- Small amounts owing (up to \$2) not payable**, 161.4
- Small business, investment in, by deferred income plans**, Reg. 4900(6), Part LI
- Small business bond**, 15.2 [no longer current]
- Small business corporation**
- attribution rules inapplicable, 74.4(2)(c)
 - business investment loss on share or debt of, 39(1)(c)
 - defined, 248(1)
 - disposition to child, 10-year reserve, 40(1.1)(c)
 - qualified, share of
 - capital gains deduction, 110.6(2.1)
 - defined, 110.6(1)
- Small business deduction**, 125
- associated corporations, 125(3)–(5)
 - “business limit”, 125(2)
 - special rules for, 125(5)
 - corporation deemed member of partnership, 125(6.1)
 - credit union, 137(3), (4)
 - definitions, 125(7)
 - large corporation, restricted, 125(5.1)(a)
 - multiple access, provisions preventing, 125(6)–(6.3)
 - partnership, *see* Partnership
 - passive income, reduces SBD, 125(5.1)(b)
 - rules for business limit, 125(5)
 - two taxation years ending in year, 125(5)
- Small business deduction rate**
- defined, 125(1.1)
- Small business development bond**, 15.1 [no longer current]
- Small business investment capital gain rollover**, 44.1
- Small business investment corporation**
- defined, Reg. 5101(1)
 - exemption from tax, 149(1)(o.3)
 - qualifies as RRSP or RRIF investment, Reg. 4900(6)(a)
- Small business investment limited partnership**
- defined, Reg. 4901(2), 5102
 - eligible for RRSP or RRIF investment, Reg. 4900(6)(b)
- Small business investment tax credit**
- calculation of, 127(9)“qualified small-business property” [repealed], 127(9)“specified percentage”(i)
 - not refundable, 127.1(2)“refundable investment tax credit”(d)(i)
- Small business investment trust**
- defined, Reg. 4901(2), 5103
 - eligible for RRSP or RRIF investment, Reg. 4900(6)(c)
 - information return where interest claimed to be qualified investment, Reg. 221
- Small business property**, Reg. Part LI
- Small business security**
- defined, Reg. 4901(2), 5100(2)
- Small-CCPC**
- defined, 157(1.2)–(1.4)
 - instalment obligation, 157(1.1), (1.5)
- Small employer**
- quarterly remittance of source deductions, Reg. 108(1.12)
- Small manufacturers’ rule**, Reg. 5201
- Social assistance payment**
- deduction from taxable income, 110(1)(f)(iii)
 - foster child, for, exempt, 81(1)(h)
 - inclusion in income, 56(1)(r), (u)
 - information return, Reg. 233
 - supplementing employment income, 56(1)(r)
 - eligible for child care deduction, 63(3)“earned income”(b)
- Social benefits repayment**, 180.2
- Social club**
- dues not deductible, 18(1)(l)
 - exemption for, 149(1)(l), 149(2)
 - deemed a trust, 149(5)
- Social insurance number**, *see also* Business Number
- application for, 221(1)(d.1), Reg. 3800
 - failure to provide, penalty, 162(5)(b), 162(6)
 - information return requiring
 - reasonable effort to obtain, 237(2)(a)
 - RESP contributions, 146.1(2)(g.3)
 - registration of RRIF under, 146.3(1)“registered retirement income fund”
 - requirement to provide, 221(1)(d.1), 237(1), (1.1)
 - attendant care receipts, 64(a)A(iii), 118.2(2)(b.1)(iv), 118.2(2)(c)(iii)
 - child care receipts, 63(1)
 - farm support payment slips, for, Reg. 236
 - partnership information return, Reg. 229(1)(b)
 - penalty for failure to provide, 162(6)
 - tax shelter investor, 237.1(7)(a)
 - use or communication of prohibited, 237(2)(b)
 - offence of, fine or imprisonment, 239(2.3)
- Social Sciences and Humanities Research Council**
- payments to, as R&D expenditures, 37(1)(a)(ii)(E), 37(7)“approved”

Social Sciences and Humanities Research Council (*cont'd*)

- research grants, taxable, 56(1)(o)

Social security

- benefits, Canada-U.S. Tax Treaty:Art. XVIII:5
- legislation
- • pension plan under, excluded from RCA, Reg. 6802(g)
- • social security taxes
- • • paid to U.S., Canada-U.S. Tax Treaty:Art. XXIV:2(a)(ii)

Social Security Tribunal

- costs of appeal to
- • deductible, 60(o)(ii)
- • reimbursement of, taxable, 56(1)(l)(ii)

Société internationale de télécommunications aéronautiques

- employment income of non-Canadians, deduction for, 110(1)(f)(iv)

Societies

- exemption for, 149(1)(l), 149(2)
- • deemed a trust, 149(5)

Soft costs

- construction, 18(3.1)–(3.7), 20(29)

Software, *see also* Computer software tax shelter property [repealed]

- air navigation, withholding tax exemption on lease of, 212(1)(d)(xi)(D)
- capital cost allowance
- • application software, Reg. Sch. II:Cl. 12(o)
- • “computer software” defined, Reg. 1104(2)
- • limitation where tax shelter, Reg. 1100(20.1)
- • system software, Reg. Sch. II:Cl. 10(f), Sch. II:Cl. 29
- • • defined, Reg. 1104(2)
- • • separate class, Reg. 1101(5p)
- development by financial institution, no R&D credits, 248(1)“scientific research and experimental development”
- non-resident withholding tax, 212(1)(d)
- royalties paid to U.S. resident, Canada-U.S. Tax Treaty:Art. XII:3(b)
- sales suppression, *see* Zapper software (or hardware)
- tax shelters
- • capital cost allowance limitation, Reg. 1100(20.1)
- • registration requirements, 237.1
- voice recognition
- • disability supports deduction, 64(a)A(ii)(G)
- • medical expense credit, 118.2(2)(l.42)
- zapper, *see* Zapper software (or hardware)

Sojourning in Canada

- 183 days, deemed resident, 250(1)(a)

Solar heating equipment

- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(i), Sch. II:Cl. 43.2(b)

Solar panels, 9(1) (Notes)

Soldiers, *see* Canadian Forces and veterans

Sole proprietorship, *see* Proprietorship

Sole-purpose R&D performer

- ITCs allowed for administrative costs, Reg. 2902(a) [closing words, repealed]

Solicitor-client privilege

- defence, 232(2)
- defined, 232(1)
- • for reportable-transaction rules, 237.3(1)
- definitions, 232(1)
- protection from notifiable-transaction rules, 237.4(15)
- protection from reportable-transaction rules, 237.3(17)
- rules governing, 232
- waiver of, 232(14)

Solid biofuel

- defined, Reg. 1104(13)

Solidarily liable, *see* Liability for tax: joint and several

Solution gas

- CCA application, Reg. Sch. II:Cl. 43.1(c)(i)(B)
- defined, Reg. 1104(13)

Solway case overruled, 244(13.1) [repealed]

Sommerer case overruled, 94(8.1), (8.2)

Son-in-law, as child of the taxpayer, 252(1)(c)

Source

- business or property, income or loss, 9–37
- capital gains and losses, 38–55
- deductions applicable to, 4(2), (3)
- employment income, 5–8
- income from, 4(1)
- other sources of income, 56–59.1
- withholding of tax at, 153(1)
- • non-residents, 215

Source deductions, *see* Withholding

Source individual

- defined, for income-splitting tax, 120.4(1)

Source withholding, *see* Withholding

South Africa, *see also* Foreign government

- stock exchange recognized, 262
- universities, gifts to, Reg. Sch. VIII, s. 19

Spacecraft, telecommunication, *see* Telecommunication spacecraft

Spain, *see also* Foreign government

- stock exchange recognized, Reg. 3201(l)
- universities, gifts to, Reg. Sch. VIII, s. 13

Speaking aid, as medical expense, 118.2(2)(i)

Special Access Programme

- drugs, medical expense credit, 118.2(2)(s)
- medical devices, medical expense credit, 118.2(2)(t)

Special-purpose building, defined, Reg. 2903

Special refundable tax

- under Part IID of former Act, ITAR 67

Special work site, employment at, 6(6)

Specific provisions

- defined, Reg. 8006

Specified active business

- defined
- • for labour-sponsored venture capital corporations, 204.8(1)

Specified active member

- defined, Reg. 8306(4)(b)

Specified adjustment factor

- defined, FAPI rules, Reg. 5902(2)(b)

Specified amount

- defined
- • re disposition of foreign resource properties, 66.7(13.2)
- • re disposition of resource properties, 66.7(12.1)
- • re flow-through share renunciations, 66(20)
- • re indexing to inflation, 117.1(2)
- • re loan from foreign affiliate, 90(15)
- • re royalty reimbursements, 80.2(1)(a)
- • re seizure of property by creditor, 79(1), 79.1(1)

Specified animal

- valuation of, 28(1.2)

Specified beneficiary

- re foreign reporting requirements
- • defined, 233.2(1)
- re principal residence
- • defined, 54“principal residence”(c.1)(ii)
- re retirement compensation arrangement (RCA)
- • defined, 207.5(1)
- re thin capitalization
- • defined, 18(5)

Specified Canadian entity

- defined, 233.3(1)
- reporting re distribution from foreign trust, 233.6(1)
- reporting re foreign property, 233.3(3)

Specified Canadian risk

- defined
- for FAPI insurance rules, 95(2)(a.3)
- for insurer's foreign branch, 95(2)(a.3), 138(12)

Specified child care start-up expenditure

- defined, 127(9)

Specified class

- defined
- associated-corporation rules, 256(1.1)
- capital gains strips, 55(1)
- wind-up of corporation, 88(1)(c.8)
- effect on corporations being associated, 256(1), (1.6)
- redemption of, 55(1)“permitted redemption”

Specified cooperative corporation

- defined, Reg. 4901(2)

Specified cooperative income (repealed)

- defined, 125(7)
- small business deduction for, 125(7)“specified corporate income”(a)(i)

Specified corporate income

- defined, for small business deduction, 125(7)
- excluded from eligibility for small business deduction, 125(1)(a)(ii.1)

Specified corporation

- defined
- re butterfly reorganization, 55(1)
- re FAPI stub-period election, 91(1.4)(c)
- re gold and silver investments by RRSPPs, etc., Reg. 4900(1)(t)(iv)

Specified cost

- debt forgiveness rules
- application of, 79.1(6), (7)
- defined, 80.01(1)
- seizure of property by creditor
- cost of seized property includes, 79.1(6)
- defined, 79.1(1)

Specified counterparty

- defined, for synthetic equity arrangement rules, 112(2.32)(b)(ii)(A)(I)

Specified date

- defined, for rule on dispositions subject to warranty, 42(2)

Specified debt obligation, see also Lending asset; Mark-to-market property

- accrued return from, Reg. 9102(1), (3)
- amalgamation of holder, 87(2)(e.3)
- amortization date, Reg. 9200(2)
- cost amount of, 248(1)“cost amount”(d.2)
- credit-related gains and losses, 142.4(7)
- defined, 142.2(1), Reg. 9100, 9200(1)
- disposition of, 142.4, Reg. 9200–9204
- no capital gain, 39(1)(a)(ii.2)
- no capital loss, 39(1)(b)(ii)
- payment received after disposition, 142.4(11)
- early repayment of, 142.4(10)
- foreign exchange adjustment, Reg. 9104
- income inclusion and deduction prescribed, 142.3(1)
- mark-to-market property, 142.5(3)
- partial disposition of, 142.4(9)
- payment received after disposition, 142.4(11)
- prescribed obligations, Reg. 9202
- primary currency of, defined, Reg. 9100
- rollover of, 85(1.1)(g.1)
- superficial loss rule not applicable, 142.6(7)

- transfer of insurance business by non-resident holder, 138(11.5)(k.1)
- wind-up of holder into parent, 88(1)(a.3)

Specified debtor

- defined, re loan from foreign affiliate, 90(15)

Specified deposit

- defined, 95(2.5)
- excluded from FAPI, 95(2)(a.3)

Specified development phase (of oil sands project)

- defined, Reg. 1104(2)

Specified disability savings plan

- plan becoming, 146.4(1.1)
- plan ceasing to be, 146.4(1.2), (1.3)
- withdrawals permitted, 146.4(1)“specified year”(a), 146.4(4)(n)(i)

Specified disabled person

- defined, for Home Buyers' Plan, 146.01(1)
- loan from RRSP to acquire home for, 146.01(1)“supplemental eligible amount”

Specified discontinuance**Specified distribution**

- for registered pension plan
- defined, Reg. 8304.1(8)
- for TFSA
- defined, 207.01(1)
- does not increase unused contribution room, 207.01(1)“unused TFSA contribution room”(b)B(ii)
- does not reduce excess TFSA amount, 207.01(1)“excess TFSA amount”C(b), E(a)

Specified educational program

- defined, 118.6(1), 146.1(1)

Specified eligibility day

- defined, for phased retirement rules, Reg. 8503(16)

Specified employee

- defined, 248(1)
- of partnership, 15(2.7)
- remuneration of
- calculation of prescribed proxy amount for R&D investment tax credit, Reg. 2900(7), (8)
- excluded from R&D expenditure pool, 37(8)
- limitation on SR&ED deduction, 37(9.1)

Specified energy property

- defined, Reg. 1100(25), (27)–(29)
- limitation on capital cost allowance, Reg. 1100(24)
- separate class, Reg. 1101(5m)

Specified entity

- defined, for hybrid mismatch arrangement rules, 18.4(1), 18.4(17)

Specified event

- defined, re stock option deduction, 110(1.6)

Specified expense (re flow-through shares)

- defined, 66(12.6), (12.601)

Specified farming or fishing income

- allowed for small business deduction, 125(7)“specified corporate income”(a)(i)
- defined, 125(7)

Specified fixed interest

- defined, for FAPI rules, 95(1)

Specified foreign exploration and development expense

- country-by-country allocation, 66(4.1), (4.2)
- successor corporation, 66.7(2.1), (2.2)
- defined, 66(15)

Specified foreign property

- defined, 233.3(1)
- over \$100,000, reporting requirement, 233.3(1)“reporting entity”

Specified future tax consequence

- defined, 248(1)
- ignored for balance-due day of corporation, 248(1)“balance-due day”(d)(i)(C)
- ignored for instalment threshold
 - corporation, 157(2.1)(a), 161(4.1)(a)
 - farmers and fishermen, 161(4)(a)
 - individuals, 156.1(1.1), (1.2), 161(4.01)(a)
- ignored for investment tax credit of small corporation, 127(10.2)A
- ignored for penalties, 162(11)
- ignored for refundable investment tax credit, 127.1(2)“qualifying corporation”

Specified gain

- defined, 93(2.02), (2.12), (2.22), (2.32)

Specified gift [repealed]

- registered charity, of
 - defined, 149.1(1)
 - excluded from charitable expenditures and qualified gifts, 149.1(1.1)

Specified hedging transaction

- deemed to be dividend rental arrangement, 248(1)“dividend rental arrangement”(b.1)
 - intercorporate dividend deduction denied, 112(2.3)
 - securities dealer allowed full deduction, 260(6.2)
- defined, 248(1)

Specified holding corporation

- defined, Reg. 5100(1)

Specified individual

- for income-splitting tax
 - defined, 120.4(1), 248(1)
 - tax on, 120.4(2)
- for LSVCCs
 - defined, 204.8(1)
 - ownership and transfer of labour-sponsored venture capital corporation shares, 204.81(1)(c)(v)–(vii)
- for pension regulations
 - defined, Reg. 8515(4)

Specified insurance benefit

- defined, for insurance demutualization, 139.1(1)

Specified interest amount

- defined, for shareholder loans, 80.4(7)

Specified interest expense

- defined, for alternative interest-deduction restrictions, 18.21(1), (4)

Specified interest income

- defined, for alternative interest-deduction restrictions, 18.21(1), (4)

Specified investment business, *see also* Investment business

- defined, 125(7), 248(1)
- excluded from active business income, 125(7)“active business carried on by a corporation”
- included in base for dividend refund, 129(4)“income” or “loss”(a)
- included in property income, 129(4)“aggregate investment income”(b)

Specified investment flow-through

- distributions tax on income trusts and partnerships, *see* SIFT trust; SIFT partnership

Specified investment flow-through partnership, *see* SIFT partnership**Specified investment flow-through trust**, *see* SIFT trust**Specified leasing property**

- acquired in the year, Reg. 1100(2)C:F(b)(iii)
- addition or alteration to, Reg. 1100(1.19)
- amount deductible in respect of, Reg. 1100(1.1)
- defined, Reg. 1100(1.11)
- separate class, Reg. 1101(5n)

Specified licensee

- defined, for non-resident withholding tax back-to-back rules, 212(3.8)

Specified loan

- defined, Reg. 8006

Specified maximum amount

- defined, for RDSP, 146.4(1)

Specified member (of partnership), *see also* Limited partner

- anti-avoidance rule
 - re alternative minimum tax, 127.52(2.1)
 - re negative ACB triggering gain, 40(3.131)
- CNIL of, 110.6(1)“investment expense”, “investment income”
- deemed capital gain on negative adjusted cost base, 40(3.1)(a)
- defined, 248(1), (28)
- FAPI rules, 95(1)“investment business”
- investment tax credit of, 127(8)(b)
- minimum tax, 127.52(1)(c.1)
- R&D losses of, no deduction, 96(1)(g)
- real property of (capital gains exemption), 110.6(1)“non-qualifying real property”
- where interest in partnership loaned or transferred, 96(1.8)

Specified minimum tax regime

- defined, for hybrid mismatch arrangement rules, 18.4(1)

Specified Minister

- defined, for RDSPs, 146.4(1)

Specified multi-employer plan, *see also* Registered pension plan

- defined, Reg. 8510(2), (3)

Specified mutual fund trust

- defined, for synthetic equity arrangement rules, 248(1)

Specified non-member

- defined, for alternative interest-deduction restrictions, 18.21(1), (6)

Specified non-qualified investment income (of registered plan)

- CRA may notify that distribution required within 90 days, 207.06(4)
 - benefit attributable to SNQII is advantage if not distributed after notice, 207.01(1)“advantage”(b)(iv)
- defined, 207.01(1)

Specified non-resident beneficiary

- defined, for thin capitalization rules, 18(5)

Specified non-resident shareholder

- defined, 18(5)
- loans by, thin capitalization rules, 18(4)–(6)

Specified obligation (re debt forgiveness rules)

- defined, 80.01(6)
- parking of, deemed settled, 80.01(7), (8)

Specified oil sands property

- defined, Reg. 1104(2)

Specified oil sands mine development expense

- defined, 66.1(6)
- excluded from EOSMDE, 66.1(6)“eligible oil sands mine development expense”A
- included in CEE, 66.1(6)“Canadian exploration expense”(g.2)(i)

Specified oil sands mine development project, *see also*

Specified oil sands mine development expense

- completion of defined, 66.1(6)“completion”
- defined, 66.1(6)

Specified owner

- defined, for artificial foreign tax credit generator rules, 91(4.2), Reg. 5907(1.04)

Specified participating interest

- defined, 248(1)

Specified partnership business limit

- assignment of, 125(8)
- defined, for small business deduction, 125(7)

Specified partnership income

- defined, 125(6), (6.2), 125(7)“specified partnership income”
- small business deduction for, 125(1)(a)(ii)

Specified partnership loss

- defined, 125(7)
- reduces small business deduction, 125(1)(a)(iv)

Specified party

- defined, for non-resident trust rules, 94(1)

Specified pension plan

- defined, 248(1), Reg. 7800
- treated as RRSP for certain purposes, 146(21)–(21.3)

Specified percentage

- COVID-19 Canada Emergency Wage Subsidy
- defined, 125.7(1)
- Canadian oil and gas exploration expense, re, Reg. 1206(1)
- corporation, in respect of partnership
- defined, 34.2(1)
- credit for northern residents
- application in calculation of credit, 110.7(1)(a), (b)(ii)
- defined, 110.7(2)
- impaired debts reserve
- defined, 20(2.4)
- investment tax credit, 127(9)
- application in calculation of credit, 127(9)“investment tax credit”(a), (a.3), (e.1)
- defined, 127(9)“specified percentage”
- long-haul truck driver meals
- allowed for consumption by driver, 67.1(1.1)
- defined, 67.1(5)
- manufacturing and processing credit — resource income
- application in calculation of credit, Reg. 5203(3)(d)
- defined, Reg. 5202
- trust distribution
- defined, 107(2)(b.1)

Specified period

- defined, for insurance demutualization, holding corporation, 141(4)

Specified person

- defined
- for attribution rules, 74.5(8)
- for dividend deductibility on guaranteed share, 112(2.22)(b)
- for First-Time Home Buyer’s Credit, 118.05(1)
- for flow-through shares, Reg. 6202.1(5)
- for prescribed security for non-resident withholding tax, Reg. 6208(3)
- for prescribed share for capital gains exemption, Reg. 6205(5)
- for prescribed shares under stock option rules, Reg. 6204(3)
- for source withholdings, 227(5.1)
- for stock option limit rules, 110(0.1)
- for wind-up of corporation, 88(1)(c.2)

Specified person or partnership

- defined, 95(1)

Specified personal corporation, defined, ITAR 57(11)**Specified place**

- defined, for long-haul trucker rules, 67.1(5)

Specified plan

- defined, 146.1(1)

Specified portion

- defined, for retroactive spreading of lump-sum payments, 110.2(1)

Specified predecessor corporation

- defined, 95(1)

Specified predecessor, defined, 59(3.4)**Specified property**

- adjustment to adjusted cost base, 53(2)(g.1), 53(4)–(6)
- child care space investment tax credit

- defined, 127(9)
- excluded, 127(9)“eligible child care space expenditure”(b)(i)
- debt forgiveness rules
- defined, 54
- gain on disposition of, 80.03
- option in respect of, when exercised, 49(3.01)
- FAPI of banks
- defined, 95(2.32)
- excluded from FAPI rule, 95(2.31)
- resource allowance
- defined, Reg. 1206(1)
- wind-up of corporation
- defined, 88(1)(c.4)
- whether subject to bump in cost based on wind-up, 88(1)(c.3)(i), (v)

Specified proportion

- for thin capitalization rules, defined, 18(5)
- of partner, defined, 248(1)

Specified provision

- defined, for attribute trading restrictions on change in control, 256.1(1)
- defined, for FAPI partnership rule where shares owned by partnership, 93.1(1.1)

Specified publicly offered debt obligation

- defined, 212(23)

Specified purchaser

- defined, for FAPI rules, 95(1)

Specified purpose

- defined
- for Australian trust rules, 93.3(4)
- for Canadian exploration expenses, 66.1(6)

Specified RDSP payment

- defined, for rollover to RDSP on death, 60.02(1)

Specified reserve adjustment

- defined, 20(30)
- impaired debt reserve calculation, 20(1)(l)(ii)(D)(II)N

Specified retirement arrangement

- defined, Reg. 8308.3(1)
- PSPA of, Reg. 8308.3(4)
- information return, Reg. 8402(3)
- pension credit under, Reg. 8308.3(2), (3)

Specified right

- defined
- for back-to-back shareholder loan rules, 15(2.192)
- for non-resident withholding tax back-to-back rules, 212(3.8)
- for thin capitalization rules, 18(5)
- for trust loss trading rules, 251.2(1)
- for 1972 transitional rules for goodwill, ITAR 21(3)

Specified royalty

- defined, Reg. 1206(1)

Specified royalty arrangement

- defined, for non-resident withholding tax back-to-back rules, 212(3.8), (3.94)

Specified sampling

- defined, 127(9)
- ineligible for investment tax credit, 127(9)“flow-through mining expenditure”(b)(ii)

Specified section 93 election

- defined, 92(1.3)
- effect of, 92(1.2), (1.4)

Specified securities lending arrangement

- defined, 260(1)

Specified share

- defined
- for non-resident trust rules, 94(1)

Specified share (*cont'd*)

- for non-resident withholding tax back-to-back rules, 212(3.8)

Specified shareholder

- defined, 18(5), 18(5.1), 55(3.2)(a), 88(1)(c.2)(iii), 248(1)
- extension of definition to trusts and partnerships, *see* Specified unitholder
- interest on debt relating to the acquisition of land, 18(3)“interest on debt relating to the acquisition of land”(b)
- non-resident, loans by, thin capitalization rules, 18(4)
- soft costs relating to construction, 18(3.1)(b), 18(3.2)(b)

Specified small business corporation

- defined, for RRSP etc. qualified investments, Reg. 4901(2)

Specified subsidiary corporation

- acquisition of share by, 88(1)(c.4)(i)
- defined, 88(1)(c.5)

Specified synthetic equity arrangement, *see also* Synthetic equity arrangement

- defined, 248(1)

Specified taxation year

- defined, 95(2)(j.1), 95(2)(k), Reg. 5907(2.9)

Specified taxpayer

- defined, for look-through rule for certain trusts, 259(5)

Specified temporary access road

- defined, Reg. 1104(2)

Specified tenant

- defined, 125.7(1)“public health restriction”(e)

Specified time

- defined
- for new employers remitting quarterly, Reg. 108(1.41)
- for non-resident trust rules, 94(1)

Specified transaction or event

- defined, 211(1)

Specified trust

- defined
- for prescribed annuity contracts, Reg. 304(1)(c)(iii)(A)

Specified unitholder

- defined, 248(1)

Specified value

- defined, for stock option deferral rules, 7(11)

Specified waste material

- defined, Reg. 1104(13)

Specified wholly-owned corporation

- defined, 55(1)

Specified year

- defined
- for employee life and health trust carryforward, 111(7.5)
- for registered disability savings plan, 146.4(1)
- for registered pension plan maximum lifetime retirement benefits, Reg. 8504(1)(a)

Speech impairment

- Bliss symbol board for, disability supports deduction, 64(a)A(ii)(N)
- certification of
- for disability credit, 118.3(1)(a.2)(ii)
- sign language interpretation services for, *see* Sign language: interpretation service

Speech-language pathologist

- certification of speech impairment
- for disability credit, 118.3(1)(a.2)(ii)
- defined, 118.4(2)

Speech recognition software, *see* Voice recognition software**Speech synthesizer for mute person**

- disability supports deduction, 64(a)A(ii)(E)
- medical expense credit, Reg. 5700(p)

Speech therapy

- medical expense credit, 118.2(2)(1.3), (1.9)

Spent pulping liquor

- cogeneration system using, Reg. Sch. II:Cl. 43.1(c)(i)(A)
- defined, Reg. 1104(13)

Sperm

- cost of, medical expense credit, 118.2(2)(v)

Spinal brace, as medical expense, 118.2(2)(i)**Spinoff**, *see* Foreign spin-off**Spire Freezers case overruled**, 96(8)**Split income**, 120.4

- attribution rules do not apply, 56(5), 74.4(2)(g), 74.5(13)
- deduction from regular income, 20(1)(ww)
- defined, 120.4(1), 248(1)
- tax on children, 120.4(2)
- minimum tax carryover not allowed, 120.2(1), 120.2(1)(b)(i)
- parent jointly liable with child, 160(1.2)

Split-pension amount

- deduction to pensioner, 60(c)
- defined, 60.03(1)
- included in pension transferee's income, 56(1)(a.2)
- joint liability for tax, 160(1.3)

Split-receipting

- charitable gifts or political contributions, 248(30)–(33)

Splitting, sharing or apportionment

- adoption expense credit, 118.01(3)
- charitable donation super credit for first-time donors, 118.1(3.2)
- charitable donations, 118.1(1)“total charitable gifts”(c)(i)(A)
- child tax credit, where custody divided, 118(5.1)
- digital news subscription credit, 118.02(3)
- disability credit, 118.3(3)
- equivalent-to-spouse credit, where custody divided, 118(5.1)
- first-time home buyer's credit, 118.05(4)
- home accessibility tax credit, 118.041(5)
- income, *see* Income splitting
- medical expenses, 118.2(1)B
- pension income, 60.03

Sport centres or sport clubs relief (COVID), Reg. 8901.1(2)(b)(ix)(A)(I), (V), *see also* Qualifying tourism or hospitality entity**Sports event**, *see also* Amateur athlete trust; Athlete

- ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(iv)
- ineligible for film/video production services credit, Reg. 9300(2)(d)

Sports participation credit, *see* Children's Fitness Credit (pre-2017)**Sports program**

- youth boarding allowance non-taxable, 6(1)(b)(v.1)

Spousal bridging benefits

- for registered pension plan, Reg. 8503(2)(1.1)

Spousal equivalent credit, 118(1)B(b)**Spousal or common-law partner plan**

- defined, 146(1)

Spousal support, *see* Support payments (spousal or child)**Spousal trust**, *see also* Trust (or estate): spouse

- pre-1972
- deemed disposition by, 104(4)(a.1)
- defined, 108(1)

Spouse, *see also* Common-law partner

- alimony, *see* Support payments (spousal or child)
- common-law deemed spouse, *see* Common-law partner
- death
- claim under provincial family law deemed to be transfer on death, 248(23.1)

Spouse (*cont'd*)

- rollover of property, 70(6)
- deemed benefits under plans, 146(8.91)
- defined, 252(3), (4)
 - re prescribed annuity contracts, Reg. 304(5)
- dividends received by, election re, 82(3)
- divorce, *see* Divorce and separation
 - former
 - defined, 252(3)
 - transfer of property to, 73(1)
- income from property transferred to
 - joint liability for tax, 160(1)–(3)
- income splitting through RRSP transfers, 146(8.3), 146.3(5.1)–(5.5)
- joint and several liability for tax, 160
- living apart
 - commutation of RRSP, 146(8.3)
 - property transferred
 - liability for tax on income or gain from, 160(4)
 - transfer to, 74.5(3)
- loans to, 74.1(1)
 - for value, 74.5
 - gain or loss, 74.2
 - repayment of, 74.1(3)
- maintenance, *see* Support payments (spousal or child)
- marriage breakdown, *see* Divorce and separation
- notch provision, 117(7), 118.2(1)D
- pension payments to widow(er) of contributor, 57(5)
- principal residence transferred to, 40(4)
- private health services plan premiums, medical expenses, 118.2(2)(q)
- property acquired from deceased taxpayer, 70(6)
- property in trust for, deemed disposition by trust, 104(4)(a)
 - deemed proceeds and cost, 104(5)
- property transferred between
 - valuation rules, 73
 - where transferee non-resident, Part XIII tax not exigible, 212(12)
- registered retirement savings plan for
 - amount of premiums deductible, 146(5.1)
 - meaning, 146(1)“spousal or common-law partner plan”
 - premiums not subject to income attribution rules, 74.5(12)
 - transfers to
 - income splitting via, 146(8.3), 146.3(5.1)–(5.5)
 - marriage breakdown, on, 146(16), 146.3(5.1), 147.3(5)
- reserves allowed to, for year of taxpayer’s death, 72(2)
- rollover of property
 - death, on, 70(6)
 - generally, 70(6)
 - *inter vivos*, 73(1)
 - reserves for year of death, 72(2)
- separation, *see* Divorce and separation
- support of
 - when living together, 118(1)B(a)
 - when separated or divorced, *see* Support payments (spousal or child)
- surviving
 - as RRIF annuitant, 146.3(1)“annuitant”(b)
 - death benefit paid to, 248(1)“death benefit”
- transfer of business to, 24(2)
- transfer of property to, 74.1(1)
 - for fair market value, 74.5
 - gain or loss, 74.2, 74.5
 - RRSP on marriage breakdown, 146(16)(b)
 - repayment of, 74.1(3)
 - special rules, 160(4)
 - valuation rules, 73
- trust for, *see* Trust (or estate): spouse
- unused credits transferred to, 118.8

Sprinkler system installer

- apprenticeship job creation credit, 127(9)“investment tax credit”

St. Lawrence oil exploration, *see* Gulf of St. Lawrence oil exploration

St. Lawrence Seaway Authority, subject to tax, 27(2), Reg. 7100

Stabilization account, *see* Net income stabilization account

Stable equipment

- capital cost allowance for, Reg. Sch. II:Cl. 10(c)

Stairs, power-operated climbing chair for, medical expense, Reg. 5700(f)

Stakeholder

- defined, for insurance demutualization, 139.1(1)

Standard & Poor 500 Depository Receipts

- qualified investments for deferred income plans, Reg. 4900(1)(n.1)

Standard amount

- defined, for northern residents’ deduction, 110.7(6)

Standby charge

- automobile, 6(1)(e)
 - car salesperson/lessor, reasonable amount, 6(2.1)
 - operating costs, optional one-half, 6(1)(k)A(iv)
 - partner or employee of partner, 12(1)(y)
 - reasonable amount, 6(2)
 - shareholder, 15(5)
- available money, for
 - non-resident tax, 214(15)

Standing therapy

- device for, medical expense credit, Reg. 5700(z.3)

Stapled security (re SIFT)

- anti-avoidance rule, 12.6
- defined, 18.3(1)
- limitation on deduction, 18.3(3)
- temporary unstapling, 12.6

Start day

- defined, for financial institution transitional accounting rules, 12.5(4)

Start-up period

- defined, for LSVCCs, 204.8(1)

State

- defined, Canada-U.S. Tax Treaty:Art. III:1(i)

Stated capital, *see* Paid-up capital

Stated percentage

- defined, 59(3.4)
 - for resource allowance, Reg. 1206(1)
 - variation of, 59(3.5)

Statistics, *see* Communication of information: statistical purposes

Status Indian, *see* Indian

Statute-barred debt, deemed settled, 80.01(9)

- subsequent payment of debt, 80.01(10)

Statute-barred reassessments, 152(3.1), (4)

Statutory exemptions, 81(1)(a)

Stay of appeal during action to prosecute, 239(4)

Steam

- deemed to be goods for M&P credit, 125.1(5)
- processing of, investment tax credit, 127(9)“qualified property”(c.1)
- production of, manufacturing and processing credit, 125.1(2)

Steamfitter/pipefitter

- apprenticeship job creation credit, 127(9)“investment tax credit”

Stepchild, dependent, 118(6)(a)

Stock, capital, *see* Capital stock; Share

Stock dividend, *see* Dividend: stock

Stock exchange

- designated, *see* Designated stock exchange
- prescribed, grandfathered from before Dec. 14/07, Reg. 3200, 3201
- recognized, *see* Recognized stock exchange

Stock index participation trust

- qualified for deferred income plans, Reg. 4900(1)(n.1)

Stock option

- benefit from, 7(1)
- addition to adjusted cost base of share, 53(1)(j)
- Canadian-controlled private corporation (CCPC), 7(1.1)
- election where shares have dropped in value since exercise, 180.01 [repealed]
- emigration from Canada, no income inclusion, 7(1.6)
- offsetting 1/2 deduction, 110(1)(d), (d.1)
- withholding of tax at source, 153(1.01)
- cancellation of rights, deemed disposition, 7(1.7)
- cash-out, 7(1)(b.1), (d.1)
- death of employee, 7(1)(e), 164(6.1)
- deduction to employer, 110(1)(e)
- deferral, 7(8)–(16)
 - information return, Reg. 200(5)
- donation of shares to charity, 110(1)(d.01)
- election by employer to forgo deduction for cash payment, 110(1.1), (1.2)
 - no deduction to employer, 18(1)(m)
- emigration of employee, 7(1.6), 128.1(4)(d.1)
- employees, to, 7, 110(1)(d), (d.1)
- excluded from deemed disposition
 - on becoming non-resident, 128.1(10)“excluded right or interest”(c)
 - on becoming resident, 128.1(1)(b)(v)
- look-through rules, 7(2)
- non-qualified security, 110(1.31), (1.4), (1.41)
 - excluded from deduction to employee, 110(1)(d)
 - notification to employee, 110(1.9)
- prescribed shares, Reg. 6204
- reduction in exercise price, 110(1.7), (1.8)
- repricing of, 110(1.7), (1.8)
- return of employee shares by trustee, 8(12)
- rights ceasing to be exercisable, deemed disposition, 7(1.7)
- stock split or consolidation, effect of, 110(1.5)
- United States interaction, Canada-U.S. Tax Treaty:Fifth Protocol (2007), Annex B, para. 6
- whether counted as SR&ED expenditure, 143.3(2)
- whether deductible to issuer, 143.3(2)

Stock purchase loan

- employee, to, 15(2.4)(c)

Stock rights

- issued to shareholder, 15(1)(c)

Stock savings plan, prescribed

- shares of
 - capital loss from disposition of, 40(2)(i)
 - prescribed assistance, deduction from cost base, 53(2)(k)(i)(C)

Stock split

- effect on stock option, rules, 110(1.5)

Stone quarry

- defined, Reg. 1104(8)

Stop International Tax Evasion Program, *see* Informant payments**Stop-loss rules**

- amalgamation, 87(2)(a), 87(2.1)
- change in control of corporation, 111(4)–(5.2)
- disposition by corporation of interest in trust, 107(1)(c)
- disposition by partner of interest in trust, 107(1)(d)
- disposition by partner of share on which dividends paid, 112(3.1)

- disposition of commercial obligation in exchange for another, 40(2)(e.2)
- disposition of debt owing by related person, 40(2)(e.1)
- disposition of partnership interest, 100(4)
- disposition of property
 - at less than FMV, 69(11)
 - to affiliated person, 40(3.3), (3.4)
 - to controller, 40(3.3), (3.4)
- disposition of share
 - held as inventory, 112(4)–(4.3)
 - in prescribed venture capital corporation or LSVCC, 40(2)(i)
 - of controlled corporation, 40(2)(h)
 - of corporation to itself, 40(3.6)
 - of foreign affiliate, 93(2)–(4)
 - on which dividend paid, 112(3)
 - received on reorganization, 112(7)
- dividend received by non-resident individual, 40(3.7)
 - credit where tax paid, 119
- exchanged shares, 112(7)
- foreign bank, on wind-up of affiliate, 142.7(13)
- losses following change of control of corporation, 111(4)–(5.2)
- mark-to-market property, 112(5.5), (5.6)
- non-resident individual, 40(3.7)
- post-emigration losses, 128.1(8)(f)
- pregnant losses, *see* Pregnant loss
- property transferred to trust, 107.4(3)(b)(ii)
- reverse takeover, 256(7)(c)–(c.2)
- shares held by financial institution, 112(5.2)
- wind-up of corporation, 88(1.1)

Stopping business, *see* Ceasing to carry on business; Winding-up**Storage area, capital cost allowance, Reg. Sch. II:Cl. 1(g)**

- for mine, Reg. Sch. II:Cl. 10(1)

Storage cost, underground

- capital cost allowance, Reg. Sch. II:Cl. 10(f.1), Sch. II:Cl. 41

Straddle transactions, 18(17)–(23)

- conditions for rules to apply, 18(18)
- deduction denied until offsetting position closed out, 18(19)
- different year-ends of taxpayer and connected person, effect of, 18(23)

Streamed income

- determination of, 66.7(2.3)(b)(ii)

Stretch credit

- for first-time charitable donor, 118.1(3.1), (3.2)

Strike pay

- not taxed (no legislative reference), *Fries* case [1990] 2 C.T.C. 439 (SCC)

Stripped bond

- cost of coupon excluded from income when sold, 12(9.1)
- interest taxable to holder, 12(1)(c)
 - annual accrual, 12(4), (9)
- non-resident withholding tax on, 212(1)(b)(i)(B)

Stripping, *see* Capital gains stripping; Interest coupon stripping; Surplus stripping**Structured arrangement**

- defined, for hybrid mismatch arrangement rules, 18.4(1)

Structured settlement

- insurer's reserve for, Reg. 1400(3)E
- taxation of, 56(1)(d) (Notes), IT-365R2 para. 5

Structures G.B. Ltée case overruled, 67.1(2)(e.1)**Stub-period end time**

- defined, for FAPI, 91(1.2)(a), Reg. 5907(8.1)

Stub period FAPI, 91(1.1)–(1.5)

- “stub period” defined, Reg. 5907(8.1)

Student

- commuting to U.S.
- tuition fees, credit, 118.5(1)(c)
- deemed resident, credit for tuition fees, 118.5(2)

Student (cont'd)

- disabled
- eligible for RESP withdrawals, 146.1(2)(g.1)(i)(B)
- waiver of RESP age requirements, 146.1(2.2)
- loan, *see* Student loan
- moving expenses, 62(2)
- part-year resident, credit for tuition fees, 118.91
- taxpayer supporting, 118.9
- tuition fees
 - ancillary fees, 118.5(3)
 - in Canada, credit, 118.5(1)(a)
 - outside Canada, credit, 118.5(1)(b)
- U.S. resident, Canada-U.S. Tax Treaty:Art. XX
- unused credits, transfers of, 118.8, 118.9

Student loan

- forgiven, to doctor or nurse practising in remote region, no tax, Reg. 7300(c)
- interest paid on, tax credit, 118.62

Stursberg case confirmed, 40(3.13)**Subcontractors**

- construction, information return, Reg. 238

Subdivision of property, *see* Partition of property**Subject corporation**

- for associated corporations simultaneous-control rule, defined, 256(6.1)(b)
- for computation of contributed surplus, defined, 84(11)
- for foreign affiliate dumping rules
 - defined, 212.3(1)
 - investment in, defined, 212.3(10)
- for non-arm's length sale of shares by non-resident corporation, defined, 212.1(1)
- for non-arm's length sale of shares by resident corporation, defined, 84.1(1)
- for Part IV refundable tax on intercorporate dividends
 - defined, 186(3)
 - tax on dividend received from, 186(1)(b)
- for private foundation penalty on holding corporate shares, defined, 188.1(3.3)(c)

Subject entity

- defined, for SIFT trust and partnership distributions, 122.1(1)

Subject subsidiary corporation

- defined, for foreign affiliate dumping rules, 212.3(16)(a)

Subleases, *see* Leasing properties**Subordinate**

- defined, for third-party penalty, 163.2(1)

Subordinate affiliate

- defined, for FAPI surplus rules, Reg. 5905(7.2)(c)

Subscriber

- defined, for RESPs, 146.1(1)

Subscriber's gross cumulative excess

- defined, for RESPs, 204.9(1)

Subscriber's share of the excess amount

- defined, for RESPs, 204.9(1)

Subsidiary, *see also* Parent (corporation)

- controlled corporation
 - defined, 248(1)"subsidiary wholly-owned corporation"
 - non-resident, *see also* Foreign affiliate
 - loan to, 17(3), 247(7)
- cost of shares of, 52(7)
- defined, 88(1), Reg. 8605(4)
- for trust loss trading rules, 251.2(1)
- foreign, *see* Foreign affiliate; Controlled foreign affiliate
- 90% or more owned, winding-up of
 - net capital losses, 88(1.2), (1.3)
 - non-capital losses, 88(1.1)
- parent corporation continuation of, 88(1.5)
- qualified expenditure, 88(1.4)

- rules, 88(1)
- wholly-owned corporation, *see also* Control of corporation
- amalgamation, on, 87(1.2), (1.4)
- defined, 248(1)

Subsidiary trust

- deemed settlement on SIFT trust wind-up, 80.01(5.1)

Subsidy

- housing, provided by employer, 6(23)

Substantial contribution of capital to partnership

- meaning of, 40(3.16)

Substantial increase in indebtedness

- meaning of, re partnership interest, 40(3.16)

Substantial interest

- defined, for Part VI.1 tax, 191(2), (3)

Substantive CCPC

- defined, 248(1), 248(43)

Substantive gift

- selling property and donating proceeds, anti-avoidance rule, 248(39)

Substitute payment arrangement

- defined, for hybrid mismatch arrangement rules, 18.4(14)
- effect of, 18.4(15)

Substitute payment mismatch

- defined, 18.4(15)(a)

Substitute's salary paid by employee

- deduction, 8(1)(i)(ii)
- certificate of employer, 8(10)

Substituted property

- defined, 248(5)
- for matchable expenditure rules, 18.1(8)(b)
- for superficial loss definition, 54"superficial loss"(a)
- for wind-up of corporation, 88(1)(c.3)

Substitution (Quebec)

- deemed to be trust, 248(3)

Subway, capital cost allowance, Reg. Sch. II:Cl. 1(j)**Succession duties**

- applicable to certain property, deduction for, 60(m.1)
- interest on, deductible, 60(d)

Successor beneficiary

- defined, for non-resident trust rules, 94(1)

Successor corporation

- Canadian resource property acquired from predecessor, 66.7(9)
- cumulative Canadian development expense, deduction for, 66.7(4)
- cumulative Canadian oil and gas property expense, deduction for, 66.7(5)
- defined, 59(3.4)
- mining exploration depletion, Reg. 1203(3)
- resource and processing allowances, Reg. 1202(3)
- resource expenses, rules re, 66.7
 - application of, 66.6
 - exclusions from, 66.7(6)
- resource property acquired from predecessor, 66.1(10)
- resource property acquired from tax-exempt person, 66.6(1), (2)
- second
 - resource and processing allowances, Reg. 1202(3)

Successor member

- defined, for pooled registered pension plan, 147.5(1)

Successor pool (re debt forgiveness rules)

- defined, 80(1)
- use of to limit reductions of resource expenditures, 80(8)(a)

Successor position

- defined, for straddle-transaction rules, 18(17)

Sulphur, *see also* Canadian field processing

- production of, Reg. 1206(1)"resource activity"(a)

Sulphur (*cont'd*)

- transporting, transmitting or processing, Reg. 1204(3)(a), 1206(1)“resource activity”(j)(i)(A)

Sunday, *see* Holiday**Super-allowance benefit amount**

- addition to investment tax credit, 127(10.1)(b)
- no direct ITC, 127(9)“investment tax credit”(a.1)
- defined, 127(9)

Super credit

- for first-time charitable donor, 118.1(3.1), (3.2)

Superannuation benefits, *see also* Pension

- defined, 248(1)
- estate receiving, 104(27)
- succession duties on, deduction for, 60(m.1)
- transferred to another plan, deductible, 60(j)
- unpaid, 78(4)

Superficial loss, *see also* Pregnant loss

- added to adjusted cost base of property, 53(1)(f)
- capital loss deemed nil, 40(2)(g)(i)
- capital property, 40(3.3)–(3.5), 54“superficial loss”
- defined, for capital gains purposes, 54
- financial institution, of, 18(13)–(15)
- no application to specified debt obligations or mark-to-market property, 142.6(7)
- inventory held as adventure in nature of trade, 18(14)–(16)

Superior court

- defined, *Interpretation Act* 35(1)

Supplemental eligible amount

- defined, for Home Buyers' Plan, 146.01(1)

Supplemental employee retirement plan, 248(1)“salary deferral arrangement” (Notes)**Supplemental Pension Plans Act**, *see* Quebec: *Supplemental Pension Plans Act***Supplementary depletion base**

- capital cost of bituminous sands equipment added to
 - proceeds of later disposition, 59(3.3)(c)
- capital cost of enhanced recovery equipment added to
 - proceeds of later disposition, 59(3.3)(d)
- defined, Reg. 1212(3)

Supplementary unemployment benefit plans, 145

- amounts received under, income, 56(1)(g)
- benefits
 - withholding tax, 153(1)(e)
- defined, 145(1)
- election to file return, 217
- employer's contribution
 - limitation on deductibility, 18(1)(i)
 - not includable in employee's income, 6(1)(a)(i)
- payments to non-resident, 212(1)(k)

Supplies

- deemed to be inventory, 10(5)
- paid for and used by employee, 8(1)(i)(iii)
- certificate of employer, 8(10)
- valuation of, 10(4)

Support amount, *see also* Child support amount

- defined, 56.1(4), 60.1(4)
- payments before agreement or court order, 56.1(3), 60.1(3)
- whether deductible, 60(b), 60.1
- whether taxable, 56(1)(b), 56.1

Support payments (farm)

- information slips required, Reg. 234–236

Support payments (spousal or child)

- “allowance” defined, 56(12)
- child support, agreement or order after April 1997
 - non-deductible, 60(b), 56.1(4)“commencement day”
 - non-taxable, 56(1)(b), 56.1(4)“commencement day”

- deductible when paid, 60(b), (c)
- enforcement of, *see Family Orders and Agreements Enforcement Assistance Act*
- income when received, 56(1)(b), (c)
- medical/educational payments, 56.1(2), 60.1(2)
- mortgage payments, 56.1(2), 60.1(2)
- no dependant credit for spouse or child when paid, 118(5)
- paid to non-resident, 212(1)(f), 217
- paid to third parties for benefit of spouse or children, 56.1, 60.1
- paid to U.S. resident, Canada-U.S. Tax Treaty:Art. XVIII:6
- reimbursement of, taxable, 56(1)(c.2)
- repayment of, deductible, 60(c.2)
- retroactive deductibility/taxability, 56.1(3), 60.1(3)
- taxable, 56(1)(b), (c)

Supporting person

- for child care expenses, defined, 63(3)
- liability for excess child tax credit refunded, 160.1(2)
- unused education credits transferred to, 118.9

Suppression election

- for foreign affiliate liquidation and dissolution, 88(3.3)–(3.4)

Supreme Theatres case overruled, 125(7)“active business carried on by a corporation”**Surcharge**, *see* Surtax**Surface construction**

- capital cost, 13(7.5)(b), Reg. 1102(14.3)

Surplus

- budget, *see* Budget surplus
- contributed
 - computation of, on transfer of insurance business, 138(11.9)
 - converted into paid-up capital, no dividend deemed, 84(1)(c.1)–(c.3)
- defined (re pension plan), Reg. 8500(1), (1.1)
- distribution of, by foreign affiliate, Reg. 5901
- exempt, *see* Exempt surplus (of foreign affiliate)
- funds derived, *see* Surplus funds derived from operations
- hybrid, *see* Hybrid surplus (of foreign affiliate)
- pre-acquisition, *see* Pre-acquisition surplus (of foreign affiliate)
- stripping, *see* Surplus stripping
- taxable, *see* Taxable surplus (of foreign affiliate)

Surplus entitlement percentage

- defined, 95(1), Reg. 5905(13)
- reduction in, deemed year-end and FAPI, 91(1.1)–(1.5)

Surplus funds derived from operations

- defined, 138(12)

Surplus stripping

- conversion of dividend to exempt capital gain, 110.6(8)
- non-resident former resident who will return to Canada, 128.1(6)(b), 128.1(7)(e)
- publicly-traded corporation, by, 183.1
- sale of shares by individual, 84.1
- sale of shares by non-resident, 212.1, 212.2

Surrender

- of property to creditor, *see also* Seizure: property
 - defined, 79(2)
 - does not constitute payment, 79(6)
 - proceeds of disposition to debtor, 79(3)
 - subsequent payment by debtor, 79(4)
- of share, partnership interest or trust interest
 - deemed capital gain, 80.03(2)
 - defined, 80.03(3)

Surrogacy expenses

- medical expense credit, 118.2(2.21)

Surrogate parent entity

- defined, for country-by-country reporting, 233.8(1)

Surrogatum principle, 9(1) Notes (“Damages”)

- Surtax**, *see also* Additional tax
- corporation, 123.2 [repealed]
 - • credit against Part I.3 tax, 181.1(4)–(7)
 - • credit against Part VI tax, 190.1(3)–(6)
 - health promotion, 182, 183
 - individual, 180.1 [repealed]
 - tobacco manufacturers, 182, 183
- Survey, quadrennial, reserve for**, 12(1)(h), 20(1)(o), Reg. 3600
- Surveying costs**
- cost base of property, addition to, 53(1)(n)
- Surveyor**
- defined, for surveys under *Canada Shipping Act*, Reg. 3600(2)
- Survivance case overruled**, 256(9)
- Surviving spouse**
- as RRIF annuitant, 146.3(1)“annuitant”(b)
 - death benefit paid to, 248(1)“death benefit”
 - tobacco manufacturers, 182, 183
- Survivor (for TFSA)**
- defined, 146.2(1)
- Survivor payment**
- defined, re death of TFSA holder, 207.01(1)“exempt contribution”(b)
- Suspended losses**, *see* Suspension of losses
- Suspension of charity receipting privilege**, 188.2
- objection to suspension, 165(1), 189(8)
 - Tax Court application for postponement of suspension, 188.2(4)
- Suspension of losses**
- capital losses, 40(3.3)–(3.5)
 - depreciable property, 13(21.2)
 - inventory held as adventure in nature of trade, 18(14)–(16)
 - share or debt owned by financial institution, 18(13), (15)
 - terminal losses, 13(21.2)
- Svenska Cellulosa/Essity spinoff**, Reg. 5600(k)
- Swap agreement**
- deemed to be eligible derivative subject to mark-to-market election, 10.1(4)
 - excluded from inventory writedown, 10(15), 18(1)(x)
 - straddle transaction restrictions, 18(17)“position”(a)(vi), 18(9)
- Swap transaction (for RRSP, RRIF, TFSA, RESP or RDSP)**
- benefit attributable to, constitutes advantage, 207.01(1)“advantage”(b)(iii)
 - defined, 207.01(1)
- Sweden**, *see also* Foreign government
- stock exchange recognized, Reg. 3201(w)
- Swine**
- basic herd maintained since 1971, deduction, 29
- Switch fund**, *see* Mutual fund corporation: switch fund
- Switzerland**, *see also* Foreign government
- stock exchange recognized, Reg. 3201(m)
 - universities, gifts to, Reg. Sch. VIII, s. 6
- Sylvite**
- extraction of, 248(1)“mineral resource”(d)(ii)
- Synagogue**, *see also* Charity
- rabbi employed by, *see* Clergy
- Syndicate**
- interest in
 - • expenses of selling, 20(1)(e)
- Synthetic disposition arrangement**
- deemed disposition and reacquisition of property, 80.6
 - defined, 248(1)
 - effect on dividend stop-loss rules, 112(8), (9)
 - effect on foreign tax credit, 126(4.5), (4.6)
- Synthetic disposition period**
- defined, 248(1)
- Synthetic equity arrangement**
- constitutes dividend rental arrangement, 248(1)“dividend rental arrangement”(c)
 - defined, 248(1)
 - no deduction for intercorporate dividend, 112(2.3)
- Synthetic equity arrangement chain**
- defined, 248(1)
 - effect of, 112(2.32)(d)
- Synthetic equity arrangement party**
- defined, 112(2.32)(a)
- Synthetic long position**
- defined, 248(1)“synthetic equity arrangement”(b)(i)(A)
- Synthetic short position**
- defined, 248(1)“synthetic equity arrangement”(b)(i)
- Synthetic speech system etc.**
- enabling blind person to use computer
 - • disability supports deduction, 64(a)A(ii)(C)
 - • medical expense credit, Reg. 5700(o)
- Syria**, *see also* Foreign government
- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(e) [repealed]
- Systemic failure**
- defined, for country-by-country reporting, 233.8(1)
- Systems software**, *see also* Software
- defined, Reg. 1104(2)
- T**
- T1 returns**, 150(1)(b), (d)
- T2 returns**, 150(1)(a)
- T3 returns**, 150(1)(c)
- T4 information return**
- filing deadline (Feb. 28), Reg. 205(1)
 - requirement for, Reg. 200(1)
- T4 slips**, Reg. 200(1), (3)
- sending to employees by email, Reg. 209(3), (5)
- T4A slips**, Reg. 200(2), 201
- T5 slips**, Reg. 201
- T661 SR&ED claim**, 37(11)
- T778 child care expenses claim**, 63(1)
- T1044: NPO information return**, 149(12)
- T1134 foreign affiliate reporting**, 233.4(4)
- T1135 foreign property reporting**, 233.3(3)
- T2200 declaration of conditions of employment**, 8(10)
- T3010 charity information return**, 149.1(14)
- T5013 partnership information return**, Reg. 229(1)
- T5018 contract reporting**, Reg. 238
- TCC**, *see* Tax Court of Canada; Taxable Canadian corporation
- TCP**, *see* Taxable Canadian property
- TCP gains balance**
- defined
 - • for mutual fund corporation, 131(6)
 - • for mutual fund trust, 132(4)
- TCP gains distribution**
- mutual fund corporation
 - • deemed to be dividend to non-resident shareholder, 131(5.1), (5.2)
 - • defined, 131(6)
 - mutual fund trust
 - • deemed to be dividend to non-resident shareholder, 132(5.1), (5.2)
 - • defined, 132(4)
- TDD device**, *see* Teletypewriter
- TFSA**, *see also* Tax-Free Savings Account
- depository, 146.2(1)“qualifying arrangement”(b)(iii)
 - exempt from tax, 146.2(6), (7), 149(1)(u.2)

- TFSA (*cont'd*)
- income from, not taxable, 146.2(6), (7)
- TFSA dollar limit**
- defined, 207.01(1)
 - contributions over, 207.01(1)“excess TFSA amount”D(a)
- TIEA**, *see* Tax information exchange agreement
- TIN (Taxpayer Identification Number)**
- defined, for Common Reporting Standard, 270(1)
 - penalty for failure to provide to financial institution, 281(3)
 - requirement to obtain and provide to financial institution, 281(1)
- TLOPA**, *see* Time Limits and Other Periods Act (COVID-19)
- TOSI (Tax On Split Income)**, *see* Income-splitting tax
- TPAR**, *see* Total pension adjustment reversal
- TPS**, *see* Taxable preferred share
- TRRP**, *see* Top-up revenue reduction percentage
- TSX**, *see* Toronto Stock Exchange
- TTY device**, *see* Teletypewriter
- T-Bill**, *see* Treasury bill
- “Tainted” spouse trust**, *see also* Pre-1972 spousal trust
- relieving rule, 70(7)
- Takeover**, *see also* Control of corporation: change of
- reverse, 256(7)(c)–(c.2)
- Talk show**
- ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(ii)
 - ineligible for film/video production services credit, Reg. 9300(2)(b)
- Talking textbooks**
- disability supports deduction, 64(a)A(ii)(I)
 - medical expense credit, Reg. 5700(w)
- Tank, oil or water storage**
- capital cost allowance, Reg. Sch. II:Cl. 6, 8, 29, 40
- Tapestry**
- hand-woven, whether CCA allowed, Reg. 1102(1)(e)
- Tar sands, defined**, 248(1), *see also* Oil sands
- Tar sands ore**
- defined, Reg. 1104(2), 1206(1)
 - processing of, Reg. 1104(5)(a)(iii), 1104(5)(c)(iii), 1104(6)(a)(iii), 1104(9)(f)(iii), 1204(1)(b)(ii)(C), 1204(1)(b)(iii)(C), 1204(1)(b)(iv)(C), 5201(c.3)
 - excluded from M&P credit, 125.1(3)“manufacturing or processing”(f)(iii)
 - investment tax credit, 127(9)“qualified property”(c)(vi)(C)
- Tawich case overruled**, 149.1(1)“qualified donee”(a)(iii), 149(1)(d.5)
- Tax**
- abatement, *see* Tax abatement
 - addition to, for income not earned in a province, 120(1)
 - additional
 - on non-Canadian corporations carrying on business in Canada, 219
 - agreement, *see* Tax treaty
 - application of payments under collection agreement, 228
 - assets used as security by DPSP trust, on, 198
 - attempt by partners to reduce or postpone, 103
 - avoidance, *see* Anti-avoidance rules
 - branch, 219
 - “business-income tax” defined, 126(7)
 - carved-out income, on, 209
 - collection of, *see* Collection of tax
 - computation of, 117(5.2), *see also* Computation of tax, Reg. Part I
 - convention, *see* Tax treaty
 - corporate distributions, on, 183.1
 - indirect payments, 183.1(5)
 - limitation, 183.1(6)
 - stock dividends repurchased for excessive amount, 183.1(3)
 - subsec. 110.6(8) not applicable, 183.1(7)
 - corporations, 123–125.1
 - court, *see* Tax Court of Canada
 - credits, *see* Tax credits
 - debt to Her Majesty, 222(2)
 - deduction at source
 - amount of, deemed received by payee, 153(3)
 - required of payer, 153
 - tables, Reg. Sch. I
 - deduction from, *see* Tax credits
 - deduction of, Reg. Part I
 - deductions in computing, *see* Deductions in computing tax
 - deferred income plans, on, *see also* Deferred income plans
 - deferred profit sharing plans, on, 198–204
 - tax on non-qualified investments and assets used as security, 198
 - estimate to be made, 151
 - evasion, *see* Tax evasion, penalty for
 - excessive capital dividend or capital gains dividend elections, on, 184
 - failure to remit amounts withheld, 227(9)
 - salary or wages, from, 227(9.5)
 - failure to withhold, 227(8)
 - assessment for, 227(10)
 - salary or wages, from, 227(8.5)
 - foreign, *see* Foreign taxes
 - forfeiture under deferred profit sharing plan, 201
 - imposed, *see* Liability for tax
 - income from Canada of non-residents, on, 212–218
 - income from property transferred at non-arm’s length, on, 160(1)–(3)
 - interest on unpaid amount, 161(1)
 - investment income of life insurers, on, 211–211.5
 - large corporations, *see* Large corporations tax (Part I.3)
 - liability for, *see* Liability for tax
 - logging
 - deduction for, 127(1), Reg. Part VII
 - defined, 127(2)
 - manufacturing and processing deduction, 125.1
 - mining, deduction, 20(1)(v), Reg. 3900
 - “non-business-income tax” defined, 126(7)
 - non-deductible, 18(1)(t)
 - non-qualified investments of deferred profit sharing plan, on, 198, 199
 - non-residents, *see* Non-resident tax
 - otherwise payable
 - defined, 120(4)“tax otherwise payable under this Part”, 126(7)“tax for the year otherwise payable under this Part”
 - over-contributions to deferred income plans, on, 204.1–204.3
 - overpayment, defined, 164(7)
 - Part I.2, deduction for, 60(w)
 - Part II, 182(1)
 - Part II.1, 183.1
 - Part IV
 - reduction in, re Part IV.1 tax payable, 186(1.1)
 - Part IV.1, 187.2, 187.3
 - reduction in Part IV tax re, 186(1.1)
 - Part VI.1, 191–191.4
 - Part XII.3
 - deductible from income of life insurer, 138(3)(g)
 - payable, *see also* Liability for tax
 - amount deemed to be, 20(1)(II)
 - corporations, 123
 - non-resident, on branch profits, 219
 - defined, 117(1), 248(2)
 - inter vivos trust, by, 122
 - payment of, *see* Payment of tax

Tax (*cont'd*)

- property disposed of by public authorities, re, 207.3, 207.4
- property held by trusts governed by deferred income plans, re, 207.1, 207.2
- rates of, *see* Rates of tax
- recovery by deduction or set-off, 224.1
- refund of overpayment, *see also* Refund
- refundable, *see* Refundable Part IV tax
- registered charities, 188, 189
- registered investments, re, 204.4–204.7
- registered securities dealers, re securities lending arrangement payments to non-residents, 212(19)
- return, *see* Returns
- revoked plans, on, 198
- security for, 220(4)–(4.4)
- shelter, *see* Tax shelter
- small business deduction, 125
- surtax
 - individual (before 2001), 180.1
 - corporation (before 2008), 123.2
- taxable dividend received by private corporation, 186
- tobacco manufacturers, 182, 183
- tobacco manufacturing income, 182
- treaty, *see* Tax treaty
- unpaid, interest on, 227(9.3)
- withheld at source
 - deemed to discharge debt, 227(13)
 - failure to remit, 227(9)
 - held in trust, 227(4), (4.1)
 - not part of estate, 227(5)
- withholding of, *see* Withholding

Tax abatement

- corporations, 124
- individuals, Reg. 6401
 - prescribed dates, Reg. 6401
 - province providing schooling allowance, 120(2)
- manufacturing and processing, 125.1
- not available to Crown corporations, 124(3)
- small business, 125

Tax accounts

- transfer of instalments between, 221.2

Tax advisor

- penalty for misrepresentation by, 163.2

Tax agreement, *see* Tax treaty**Tax anniversary date**

- defined, Reg. 310

Tax attribute

- defined, for tax-debt avoidance penalty, 160.01(1)

Tax attribute transaction

- defined, for tax-debt avoidance penalty, 160.01(1)

Tax avoidance, *see* Anti-avoidance rules**Tax avoidance motive**, *see also* Anti-avoidance rules**Tax avoidance policy**

- defined (life insurance policy), Reg. 310
- deemed not to be exempt policy, Reg. 306(1)

Tax basis

- defined, 142.4(1), Reg. 9100, 9200(1)
 - variation in, for certain insurers, 138(13)
- used as cost amount for specified debt obligation, 248(1)“cost amount”(d.2)

Tax benefit

- defined
 - for notifiable transactions, 237.3(1)
 - for reportable transactions, 237.3(1)
 - for tax-debt avoidance penalty, 160.01(1), 163.2(1)
 - general anti-avoidance rule (GAAR), 245(1)
 - transfer pricing documentation, 247(1)

Tax consequences, defined, 245(1)**Tax convention**, *see* Tax treaty**Tax Court of Canada**, *see also* Appeal

- appeal from, to Federal Court of Appeal, *see* Federal Court of Appeal
- appeal to, 169
 - application to all taxpayers with common issue, 174
 - general procedure, 175
 - informal procedure, 170
 - only on grounds raised in objection, 169(2.1)
 - prohibited where right waived by taxpayer, 169(2.2)
 - settlement of appeal, 169(3)
 - time not counted, 174(5)
 - valuation of ecological property, 169(1.1)
- application for extension of time
 - for appeal, 167
 - for notice of objection, 166.2
- disposal of appeal, 171(1)
 - on specific issue, 171(2)–(4)
- reference to
 - common questions, 174
 - tax shelter appeal, common question, 174
 - where no reasonable grounds for appeal, 179.1

Tax credits, *see also* Deductions in computing tax

- adoption expenses, 118.01
- aged 65 and over, 118(2)
- apportionment of, *see* Splitting, sharing or apportionment
- basic minimum, 127.531
- basic personal, 118(1)B(c)
- CPP contributions, 118.7
- Canada employment, 118(10)
- caregiver (infirm dependant)
 - additional amount, 118(1)B(a)(ii)C(A), 118(1)B(b)(iv)D(A), 118(1)B(b.1), 118(1)B(c.1)E(a)
 - base amount
 - after 2016, 118(1)B(d)
 - before 2017, 118(1)B(c.1)
- charitable donations, 118.1
- child (pre-2015), 118(1)B(b.1)
- children’s arts (pre-2017), 118.031
- children’s fitness, 118.03 [before 2015], 122.8 [2015–16]
- dependants, 118(1)B(b), (c), (d)
 - support payments, effects of, 118(5)
- digital news subscriptions, 118.02
- disability, 118.3
- disability home buyer, 118.05
- employment, 118(10)
- employment insurance premiums, 118.7
- equivalent-to-married status, 118(1)B(b)
- family caregiver, *see* caregiver (above)
- first-time home buyer, 118.05
- First Nations tax paid, 120(2.2)
- fitness, 118.03 [before 2015], 122.8 [2015–16]
- foreign taxes, 126
- fraudulently obtained, offence, 239(1.1)
- GST/HST, 122.5
- gifts, 118.1
- home accessibility (senior or disabled person), 118.041
- individual, 118
- in-home care of relative
 - after 2016, no specific credit, *see* caregiver (above)
 - before 2017, 118(1)B(c.1)
- investment, 127(5)–(36), 127.1, *see also* Investment tax credit
- labour-sponsored funds, 127.4
- lump-sum averaging, 120.31
- manufacturing and processing, 125.1
- married status, 118(1)B(a)
- medical expenses

- Tax credits** (*cont'd*)
- non-refundable credit, 118.2
 - refundable credit, 122.51
 - mental or physical impairment, expenses related to, 118.2(2)(b), (c)
 - non-resident individual, 118.94
 - online newspapers, 118.02
 - ordering of, 118.92
 - overseas employment (pre-2016), 122.3
 - part-year resident, 118.91
 - pension income, 118(3)
 - personal, 118(1)
 - limitations, 118(4)
 - not available to trust, 122(1.1)
 - political contributions, 127(3)–(4.2)
 - public transit pass, 118.02 [pre-2018]
 - research and development, *see* Investment tax credit
 - school supplies, 122.9
 - scientific research, *see* Investment tax credit
 - separate returns, in, 118.93
 - single status, 118(1)B(c)
 - small business, 125
 - splitting of, *see* Splitting, sharing or apportionment
 - spousal, 118(1)B(a)
 - teacher school supplies, 122.9
 - textbook, 118.6(2.1)
 - training credit, 122.91(1)
 - tuition credit, 118.5
 - carryforward of unused portion, 118.61
 - transfer of unused portion, 118.8, 118.9
 - unused
 - carryforward, 118.61
 - transfer to spouse, 118.8
 - transfer to supporting person, 118.9
 - volunteer firefighter, 118.06
- Tax debt**
- action to commence, 10-year limitation period, 222(3)–(10)
 - collection of, *see* Collection of tax
 - defined, 222(1)
 - recoverable by the Crown, 222(2)
- Tax debtor**
- transfer of property, by, transferee liable, 160
- Tax deferral**, *see also* Rollover
- agreement authorized by tax treaty, deemed valid, 115.1
- Tax deferred cooperative share**
- defined, for agricultural cooperatives, 135.1(1)
- Tax-deferred patronage dividends**, 135.1
- Tax equity**
- defined, ITAR 26(12)
- Tax evasion, penalty for**, 163, 238, 239
- Tax-exempt income**
- defined, for foreign tax credit, 126(7)
- Tax-exempt person**, *see* Exempt person
- Tax factor**
- relevant, defined, 95(1)
- Tax for year otherwise payable under Part I**
- defined, 126(7)
- Tax-Free Savings Account**, 146.2, 207.01–207.07
- administration fees, non-deductible, 18(1)(u)
 - annuity from, not taxable, 56(1)(d)(iii)
 - attribution rules do not apply, 74.5(12)(c)
 - carrying on business, tax on, 146.2(6)
 - liability of holder and trustee, 146.2(6.1)
 - death of holder, 12(1)(z.5), 146.2(9), 207.01(3)
 - annual accrual of income after death, 12(11)“investment contract”(d.1)
 - defined, 248(1)“TFSA”
 - depositary, 146.2(1)“qualifying arrangement”(b)(iii)
 - designation of charity as beneficiary, 118.1(5.2)(b)
 - disposition of property to, capital loss nil, 40(2)(g)(iv)(A)
 - dollar limit, 207.01(1)“TFSA dollar limit”
 - contributions over, 207.01(1)“excess TFSA amount”D(a)
 - tax on, 207.02
 - election for proportional holdings in trust property, 259(1)
 - emigration of holder, no deemed disposition, 128.1(10)“excluded right or interest”(a)(iii.2)
 - excluded from various trust rules, 108(1)“trust”(a)
 - exempt from tax, 146.2(6), (7), 149(1)(u.2)
 - exemption-end time, defined, 146.2(9)(a)
 - income from, not taxable, 146.2(6), (7)
 - information return, Reg. 223
 - interest on money borrowed to contribute to, not deductible, 18(11)(j)
 - investment counselling fees, non-deductible, 18(1)(u)
 - money borrowed to contribute to, no deduction, 18(11)(j)
 - no tax on, 146.2(6), 149(1)(u.2)
 - prohibited investments, *see* Prohibited investment
 - qualified investments, 207.01(1)“qualified investment”
 - Quebec, in, deemed to be trust, 248(3)(c)
 - regulations, 146.2(13)
 - reversionary trust rules do not apply, 75(3)(a)
 - services in respect of, non-deductible, 18(1)(u)
 - T3 trust return not required, Reg. 204(3)(f)
 - tax on excess contributions, 207.02
 - transfer to another TFSA
 - not a disposition, 248(1)“disposition”(f)(vi)
 - not counted as overcontribution, 207.01(1)“qualifying transfer”
 - permitted, 146.2(2)(e)
 - used as security for loan, 146.2(4)
- Tax-free surplus balance**
- of a foreign affiliate
 - amended bump designation, 88(1.8), (1.9)
 - defined, Reg. 5905(5.5)
- Tax-free zone**
- pre-1972 capital gains, ITAR 26(3)
- Tax imposed**, *see* Liability for tax
- Tax-indifferent investor**
- defined, 248(1)
 - whether carries risk in dividend rental arrangement, 112(2.32)
- Tax informant program**, *see* Informant payments
- Tax information exchange agreement**, *see also* Tax treaty
- creates “designated treaty country”, Reg. 5907(11)
 - demand for information relating to, 231.2(1)
 - disclosure of taxpayer information for purposes of, 241(4)(e)(xii)
 - dividends from country, deemed to be out of exempt surplus, Reg. 5907(1)“exempt earnings”(d), 5907(11)
 - list of countries, 95(1)“non-qualifying country” (Notes)
 - not present, income deemed FAPI, 95(1)“non-qualifying business”, “non-qualifying country”
- Tax matters partner**
- to file objections to determination of partnership income, 165(1.15)
- Tax on split income**, *see* Income-splitting tax
- Tax otherwise payable**
- defined, 120(4)
- Tax-paid amount**
- defined, 146(1)
 - excluded from RRIF income
 - generally, 146.3(5)(c)
 - on death, 146.3(6.2)A(b), (c)
 - excluded from RRSP income
 - generally, 146(1)“benefit”(c.1)
 - on death, 146(8.9)A(b), (c)

Tax paid balance

- defined, for agricultural cooperatives, 135.1(1)

Tax-paid earnings

- defined, for thin capitalization rules, 18(5)

Tax payable, see Tax: payable

- defined, 127–127.5, 248(2)
- determination of, by Minister, 152(1.11), (1.12)
- determined without reference to minimum tax, 117(1)

Tax preparer

- defined, 150.1(2.2)
- required to file electronically, 150.1(2.3), (2.4)
- • penalty (filing fee) for non-compliance, 162(7.3)

Tax protestors, 2(1) (Notes), 248(1)“person” (Notes)**Tax rebate discounting, 220(6) (Notes)****Tax return, see Returns****Tax shelter**

- appeal of assessment, binding on all taxpayers in same shelter, 174
- art, *see* Art flips
- business does not entitle individual to June 15 filing deadline, 150(1)(d)(ii)(A)
- Canadian film credit not available, 125.4(4)
- charitable donations, 237.1(1)“gifting arrangement”
- • collection of half of tax in dispute, 164(1.1)(d)(ii)(B), 225.1(7)
- computer equipment, *see* Computer tax shelter property
- computer software, *see* Computer tax shelter property
- cost of, 143.2
- deduction disallowed
 - • where identification number not provided, 237.1(6)
 - • where penalty unpaid, 237.1(6.1)
- defined, 237.1(1)
- film, *see* Motion picture film
- fiscal period, election for non-calendar year prohibited, 249.1(5)
- identification number
 - • application for, by promoter, 237.1(2)
 - • display of, required, 237.1(5)
 - • issuance of, by Minister, 237.1(3)
 - • penalty for false information in application, 237.1(7.4)
 - • penalty for selling shelter before number issues, 237.1(7.4)
 - • prerequisite for deduction, 237.1(6)
 - • prerequisite of sale etc., 237.1(4)
 - • provision of, to buyers, 237.1(5)
- information outside Canada, 143.2(13), (14)
- information return
 - • promoter must file, 237.1(7)–(7.5)
 - • • extended reassessment deadline if not filed, 152(4)(b.1)
 - • tax shelter number to be included, 237.1(5)(c)
- investment, 143.2
 - • defined, 143.2(1)“tax shelter investment”
 - • matchable expenditure, 18.1(13)
 - • reassessment, no limitation period, 143.2(15)
 - • matchable expenditure rules, 18.1
 - • minimum tax on deductions, 127.52(1)(c.3)
 - • Minister’s powers of investigation, 237.1(8)
 - • MURB, *see* Multiple unit residential buildings
 - • mutual fund limited partnership, 18.1
 - • prescribed benefit, Reg. 3100
 - • promoter
 - • • application for identification number, 237.1(2)
 - • • defined, 237.1(1)
 - • • information return, 237.1(7)
 - • • provision of identification number to buyers, 237.1(5)
 - • sales prohibited without identification number, 237.1(4)
 - • software, *see* Computer tax shelter property
 - • yacht, *see* Yacht

Tax shelter investment, see Tax shelter: investment**Tax sparing, pre-1976 investment, Reg. 5907(10)****Tax transfer payments to provinces, 154, Reg. 3300****Tax treatment**

- defined, for mandatory disclosure rules, 237.3(1), 237.4(1), 237.5(1)

Tax treaty, see also Tax information exchange agreement

- amounts exempt under, deduction for, 110(1)(f)(i)
- anti-treaty shopping rule, Canada-U.S. Tax Treaty:Art. XXIX-A
- Canada–U.K., *see* Table of Contents
- Canada–U.S., *see* Table of Contents
- competent authority agreement deemed valid, 115.1
- country with, foreign affiliate in, Reg. 5907(11)–(11.2)
- credit for departing resident to country with which Canada has, 126(2.21)
- deduction from income, 110(1)(f)(i)
- deemed resident in Canada due to family member, 250(1)(g)
- defined, 248(1)
- designated treaty country (FAPI rules), Reg. 5907(11), (11.1)
- disclosure of information as permitted by, 241(4)(e)(xii)
- dividend limitation in
 - • applies for branch tax, 219.2
 - • applies for corporate emigration tax, 219.3
- exempting Canadian person from tax, 250(5)
- gains deemed to arise in Canada, *Income Tax Conventions Interpretation Act* s. 6.3
- income exempt under, 126(7)“tax-exempt income”
- income exempt under, not earned income for RRSP, 146(1)“earned income”(c)
- interpretation of, *Income Tax Conventions Interpretation* (reproduced before the treaties)
- list of, *see* Table of Contents
- listed countries, Reg. 5907(11)–(11.2)
- non-resident under, deemed non-resident of Canada, 250(5)
- partners exempted by, new partner joining partnership, 96(8)
- property exempted under, 108(1)“exempt property”
- requirement to file return to claim exemption, 150(1)(a)(ii)
- tax on disposition of property by non-resident deferred under, 115.1
 - • election, time of making, Reg. 7400(2)
 - • prescribed provisions, Reg. 7400(1)

Taxable amount

- amount, *see* Taxable capital amount

Taxable benefits, see Benefit**Taxable Canadian business**

- defined, 95(1)
- application to FAPI rules, 95(2)(j.1), (k), (k.2)

Taxable Canadian corporation

- defined, 89(1)“taxable Canadian corporation”
- prescribed, for Canadian film/video credit, Reg. 1106(2)
- property disposed of to taxpayer
 - • cost base, addition to, 53(1)(f.1)

Taxable Canadian life investment income

- defined, 211.1(2)

Taxable Canadian property, see also Property

- defined, 248(1)
- • excludes shares of demutualized life insurer or holding corporation, 141(5)
- • exclusions for branch tax purposes, 219(1.1)
- • disposition of, by non-resident, 116
- • purchaser liable for tax, 116(5)
- • taxable, 2(3)(c)
- distributed on foreign affiliate liquidation and dissolution, 88(3.5)
- distribution to non-resident beneficiaries
 - • tax on, 107(5)
 - • security for tax, 220(4.6)–(4.63)
- excluded from deemed disposition

- Taxable Canadian property (*cont'd*)
 - on becoming resident, 128.1(1)(b)(i)
 - foreign merger, rollover on, 87(8.4), (8.5)
 - includes option, 248(1)“taxable Canadian property”(f)
 - mutual fund, of, *see* TCP gains distribution
 - prorating for gains before May 1995, 40(9)
 - replacement of
 - capital property, 44(5)(c), (d)
 - depreciable property, 13(4.1)(c), (d)
 - rollover of, 85(1)(i), 85.1(1)(a)
 - on foreign merger, 87(8.4), (8.5)
 - ship or aircraft used in international traffic, 248(1)“taxable Canadian property”(b)(ii)
 - transitional rule re property not covered before April 26/95, ITAR 26(30)
- Taxable capital**
 - for financial institutions tax
 - defined, 190.12
 - employed in Canada, defined, 190.11
 - for large corporations tax (pre-2006)
 - defined, 181.2(2), 181.3(2)
 - tax on (pre-2006), 181.1(1)
 - employed in Canada, defined, 181.2(1), 181.3(1), 181.4, Reg. 8601
- Taxable capital amount**
 - defined, 66(12.6011)
 - limit of \$15 million for pre-2019 flow-through of CDE as CEE, 66(12.601)(a.1)
- Taxable capital employed in Canada**
 - defined
 - for financial institutions tax, 190.11
 - for large corporations tax, 181.2(1), 181.3(1), 181.4
 - for renunciation of pre-2019 CDE as CEE on flow-through shares, 66(12.6011)
- Taxable capital gain**, *see* Capital gain
- Taxable conversion benefit**, *see also* Conversion benefit
 - defined, for insurance demutualization, 139.1(1)
- Taxable deficit (of foreign affiliate)**
 - defined, Reg. 5907(1)
- Taxable dividend**
 - deemed, *see* Dividend: deemed
 - defined, 89(1), 112(6)(a), 129(1.2), 129(7), 133(8), 248(1)
 - for purposes of debt forgiveness, 80.03(1)(b)
 - for purposes of dividend refund, 129(7)
 - for purposes of stop-loss rules, 112(6)(a)
 - generally, 89(1), 248(1)
 - partnership receiving, 186(6)
- Taxable earnings (of foreign affiliate)**
 - defined, Reg. 5907(1)
- Taxable income**
 - communal organization, election re, 143(2), (3)
 - computation of, 110–114
 - deductions, *see* Deductions in computing taxable income
 - individual
 - order of application, 111.1
 - resident for part of year, 114, 114.1
 - deductions in computing, *see* Deductions in computing taxable income; Tax credits
 - defined, 2(2)
 - determination of, by Minister, 152(1.11), (1.12)
 - earned in a province by a corporation, Reg. Part IV
 - earned in Canada, *see* Taxable income earned in Canada
 - earned in the year in a province, 124(4)
 - life insurer, 138(7)
 - non-resident, earned by in Canada, 115
 - non-resident person, 115
- Taxable income earned in Canada, 115**
 - defined, 115(1), 248(1)
 - determination of, by Minister, 152(1.11), (1.12)
 - foreign resource pool expenses, 115(4.1)
- Taxable interest expense**
 - defined, 218.2(2)
- Taxable life insurance policy**
 - defined, 211(1)
- Taxable loss (of foreign affiliate)**
 - defined, Reg. 5907(1)
- Taxable net gain**
 - from listed personal property, defined, 41(1), 248(1)
- Taxable non-portfolio earnings**
 - defined, 197(1)
 - reduced by Part IX.1 tax payable by SIFT partnership, 96(1.11)(b)
- Taxable obligation**
 - defined, 240(1)
- Taxable preferred share**
 - defined, 248(1)
 - dividends excepted from tax, 187.1
 - tax on corporation paying dividends on, 191–191.4
 - agreement to transfer tax liability to related corporation, 191.3
 - assessment by Minister, 191.3(3), (5)
 - payment by transferor corporation, 191.3(6)
 - where of no effect, 191.3(4)
 - amalgamation, 87(2)(rr)
 - associated corporations, 191.1(3)
 - failure to file agreement, 191.1(5)
 - total dividend allowance, 191.1(4)
 - dividend allowance, 191.1(2)
 - short years, in, 191.1(6)
 - total, for associated corporations, 191.1(4)
 - excluded dividend, defined, 191(1)
 - financial intermediary corporation, defined, 191(1)
 - information return, 191.4(1)
 - private holding corporation, defined, 191(1)
 - substantial interest, 191(2), (3)
 - tax payable, 191.1(1)
 - election, 191.2
 - tax on dividends received by corporation, 187.2
 - information return, 187.5
 - partnerships, 187.4
- Taxable RFI share**
 - amalgamation, effect of, 87(4.2)
 - defined, 248(1)
 - tax on dividend, 187.3(1)
- Taxable SIFT distributions**
 - defined, Reg. 414(1), (2)
- Taxable SIFT trust distributions**
 - defined, 122(3)
 - excluded in determining province of residence of trust, Reg. 2608
 - tax on, 122(1)(b)B
- Taxable supplier**
 - defined, 127(9)
- Taxable surplus**
 - election to come before hybrid surplus, Reg. 5901(1.1)
 - portion of dividend deemed paid out of, Reg. 5900(1)(a)
- Taxable surplus (of foreign affiliate)**
 - adjustment where gain deemed due to negative adjusted cost base, 93(1)(b)(ii)
 - deduction for dividend paid out of, 113(1)(b), (c), Reg. 5900(1)(b)
 - defined, 113(1)(b)(ii), Reg. 5907(1)

Taxation year, *see also* Fiscal period

- becoming or ceasing to be CCPC, deemed year-end, 249(3.1)
- becoming or ceasing to be exempt, deemed year-end, 149(10)
- becoming or ceasing to be financial institution, deemed year-end, 142.6(1)
- ceasing to carry on business, 25(1)
- change of control, deemed year-end, 249(4)
- company formed by amalgamation, of, 87(2)(a)
- corporation, of
 - longer than 365 days, 249(3)
- deemed “fiscal period”, 14(4) [before 2017]
- defined, 11(2), 142.6(1), 149(10), 149.1(1), 249, Reg. 1104(2), 1802(5), 3700
- of mutual fund following rollover, 132.2(3)(b), 132.2(3)(1)(ii)
- employees profit sharing plan trust, 144(11)
- first, of mortgage investment corporation, 130.1(8)
- fiscal period of business, and, 11(2)
- foreign affiliate, of, 95(1)“taxation year”
- individual, of, 11(2), Reg. 1104(2)
- less than 12 months, *see* Short taxation year
- mutual fund trust, election for December 15, 132.11
- non-resident, of, 250.1(a)
- partnership, of, 96(1)(b)
- reference to, 249(2), (3)
- registered Canadian amateur athletic association, of, 149.1(1)“taxation year”
- registered charity, of, 149.1(1)“taxation year”
- short, *see* Short taxation year

Taxed capital gains (of investment corporation, mutual fund corporation or mutual fund trust)

- defined, 130(3)(b), 131(7), 132(5)

Taxicabs, Reg. Sch. II:Cl. 16**Taxing country**

- defined
- for FAPI, Reg. 5910(4)
- for foreign tax credit, 126(7)

Taxpayer

- absconding, 226
- bankrupt, 128
- becoming Canadian resident, ITAR 26(10)
- ceasing to be resident, *see* Non-resident: becoming
- death of, *see* Death of taxpayer
- defaulting, 226
- defined, 248(1)
 - for interest deduction restrictions, 18.2(1)
 - includes partnership for certain purposes, 18.1(1), 56.4(1), 96(2.01), 125.6(2.2), 143.2(1), 143.3(1), 143.4(1)“taxpayer”
- investigation, under
 - rights of, at inquiry, 231.4(6)
- leaving Canada, demand for amounts owing, 226
- not limited to person liable for tax, 248(1)

Taxpayer Identification Number, *see* TIN (Taxpayer Identification Number)**Taxpayer information**

- defined, 241(10)
- provision of
 - authorized, 241(4)
 - prohibition against, 241(1)

Taxpayer relief

- late elections, 220(3.2)–(3.7)
- reassessments after normal reassessment period, 152(4.2), 164(1.5)
- waiver of penalty and interest, 220(3.1)

Teacher

- contribution to teachers’ exchange fund, 8(1)(d)
- exemption for travel expenses, 81(3.1)(a)(ii)
- registered pension plan, contribution to, 147.2(5)

- sabbatical arrangement, Reg. 6801(a)
- exemption for recontributed amount received from plan, 81(1)(s)

Teacher school-supplies credit, 122.9(2)

- prescribed durable goods, Reg. 9600

Teaching supplies

- defined, for teacher school-supplies credit, 122.9(1)

Teck-Bullmoose case overruled, 13(7.5)**Telecom NZ-Chorus Ltd. spinoff**, Reg. 5600(f)**Telecommunication spacecraft**

- capital cost allowance, Reg. Sch. II:Cl. 10(f.2), Sch. II:Cl. 30(a)
- separate classes, Reg. 1101(5a)

Telecommunications

- defined, *Interpretation Act* s. 35(1)

Teleglobe Canada, subject to tax, 27(2), Reg. 7100**Telegraph system**

- defined, Reg. 1104(2)

Telephone and telegraph equipment

- capital cost allowance, Reg. Sch. II:Cl. 3, Sch. II:Cl. 17

Telephone and telegraph systems

- capital cost allowance, Reg. Sch. II:Cl. 17
- defined, Reg. 1104(2)

Telephone cable

- capital cost allowance, Reg. Sch. II:Cl. 42(b)

Telephone ringing indicator

- disability supports deduction, 64(a)A(ii)(B)
- medical expense credit, Reg. 5700(k)

Teletypewriter

- disability supports deduction, 64(a)A(ii)(B)
- medical expense credit, Reg. 5700(k)

Television commercial message

- capital cost allowance, Reg. Sch. II:Cl. 12(m)
- defined, Reg. 1104(2)

Television decoder (to visually display vocal portion of signal)

- medical expense, Reg. 5700(q)

Television set-top box

- capital cost allowance, Reg. Sch. II:Cl. 30(b)

Temporary access road, *see* Specified temporary access road**Temporary relocation deduction**

- defined, for labour mobility deduction, 8(14)(f)

Temporary wage subsidy (COVID-19), 153(1.02)–(1.04)**Temporary work location**

- defined, for labour mobility deduction, 8(14)(b)

Ten-eight policy, *see* 10/8 policy [at end of Index]**Ten-year gift (to charity)**, *see* Enduring property [repealed]**Tenant inducements**

- taxable as income, 12(1)(x)

Term insurance

- defined, Reg. 2700(1)

Term preferred share

- defined, 248(1)
- dividends on
 - deemed, 84(4.2), 258(2)
 - received by specified financial institution, 112(2.1)
 - deemed interest on, 258(3)(a)
- reduction of paid-up capital, deemed dividend, 84(4.2)
- share-for-share exchange, 87(4.1)

Terminal loss

- deduction for, 20(16)
 - after ceasing to carry on business, 20(16.3)
- limitation re passenger vehicles, 20(16.1)(a)
- limitation re franchise or licence exchanged, 20(16.1)(b)
- limitation where property acquired by affiliated person, 13(21.2)(e)(i)

Terminating corporation

- class A shares can be issued to, for LSVCC, 204.81(1)(c)(ii)(A)
- defined, for labour-sponsored venture capital corporations, 204.8(1)

Termination of business, *see* Ceasing to carry on business

Termination payment, *see* Retiring allowance

Territorial sea

- defined, *Interpretation Act* 35(1)

Territory

- defined, *Interpretation Act* 35(1)

Terrorism, *see* *Charities Registration (Security Information) Act*

Tertiary recovery equipment, Reg. 1206(1)

Test wind turbine

- allowed as CRCE, Reg. 1219(1)(g)
- defined, Reg. 1219(3)

Testamentary trust, *see* Trust (or estate): testamentary

Texas partnership

- losses disallowed, 96(8)

Textbook tax credit, 118.6(2.1)

Textbooks, talking, *see* Talking textbooks

Theatres relief (COVID), Reg. 8901.1(2)(b)(iv), (xiv), *see also* Qualifying tourism or hospitality entity

Theme parks relief (COVID), Reg. 8901.1(2)(b)(viii), *see also* Qualifying tourism or hospitality entity

Therapy

- medical expense credit
 - general, 118.2(2)(1.9)
 - rehabilitative, for speech or hearing loss, 118.2(2)(1.3)
- non-taxable employment benefit, 6(1)(a)(iv)

Thermal waste

- defined, Reg. 1104(13)

Thin capitalization rules, 18(4)–(8)

- back-to-back loans, 18(6), (6.1)
- deemed dividend for non-resident withholding tax, 214(16), (17)
- income inclusion for corporate partner, 12(1)(1.1)
- interest not deductible, 18(4)–(6)
- trust designation of thin-cap interest paid to non-resident as being payment to beneficiary, 18(5.4)

Things, *see* Property; Rights or things

Third party

- defined, for amateur athlete trusts, 143.1(1)
- demand, *see* Third party demand
- payment, *see* Scientific research and experimental development: third party payment
- penalty for misrepresentation by, 163.2

Third party demand

- information, for, 231.2(1)
- payment, for, *see* Garnishment for taxes unpaid

Threshold amounts, *see* Dollar amounts in legislation and regulations

Tidal energy, electricity generation equipment

- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xiv), Sch. II:Cl. 43.2

Tiers of partnerships

- look-through rules, 15(2.14)(b), 18.4(18), 66.8(3)(b), 91(4.4), 93.1(3), 96(2.01), 102(2), 126(4.13), 149.1(11), 163(2.8), 233(3), 233.1(5), 233.3(2), 233.4(3), 247(6), Reg. 1100(12)(b)(ii), 1100(16)(b)(ii), 1100(25)(b)(iv)(B), 1100(26)(b)(ii)
 - at-risk rules, 96(2.01), 96(2.1)(f)
 - capital gains deduction, 110.6(14)(d.1)
 - foreign affiliate determination, 93.1(3), Reg. 5908(9)
 - Large Corporations Tax, 181.2(3)(g)A(b)(i), 181.2(5)
 - Part VI.1 tax, 191(6)
 - partnership rules generally, 96(2.01), 102(2)

Tile drainage, deduction, 30**Tilesetter**

- apprenticeship job creation credit, 127(9)“investment tax credit”

Timber limits

- capital cost allowance, Reg. 1100(1)(e), Reg. Sch. VI
- separate classes, Reg. 1101(3)
- disposition of by non-resident, 216(5)
- equipment for use in, capital cost allowance, Reg. Sch. II:Cl. 10(n), Sch. II:Cl. 15

Timber resource property

- capital cost allowance, Reg. Sch. II:Cl. 33
- constitutes taxable Canadian property for certain purposes, 248(1)“taxable Canadian property”(n)(ii)
- defined, 13(21)
- disposition of
 - by non-resident, 216(5)
 - no capital gain, 39(1)(a)(v)
 - proceeds of disposition, 20(5.1)
- in corporation, share is taxable Canadian property, 248(1)“taxable Canadian property”(e)(i)(C), (ii)(C)
- in partnership, constitutes taxable Canadian property, 248(1)“taxable Canadian property”(g)(iii)
- non-arm’s length transfer, exclusion from rule, 13(7)(e)
- undepreciated capital cost, 13(21)“undepreciated capital cost”G

Timber royalty

- paid to non-resident, 212(1)(e)
- alternative re, 216

Time

- deadlines and time limits for taxpayers, *see* Deadlines
- expiring to recover a debt, *see* Statute-barred debt, deemed settled
- extension of, *see* Extension of time
- non-resident, *see* Non-resident time
- reassessment, for, *see* Reassessment

Time Limits and Other Periods Act (COVID-19), 169(1) (Enacted Amendment)

Tips, *see also* Informant payments

- source withholding, Reg. 100(1)“remuneration”(a.1)
- taxable as employment income, 5(1)

Titles in legislation

- relevance of, *Interpretation Act* s. 14

Tobacco manufacturers’ surtax, 182, 183

Toilet

- mechanical aid for getting on and off, medical expense, Reg. 5700(g)

Tool and die maker

- apprenticeship job creation credit, 127(9)“investment tax credit”

Tools

- apprentice mechanics, *see* Apprentice: mechanic
- eligible, *see* Eligible tool
- employed tradesperson, deduction, 8(1)(s)
- portable, for rental
 - capital cost allowance, Reg. Sch. II:Cl. 10(b), Sch. II:Cl. 29
- small, capital cost allowance, Reg. Sch. II:Cl. 12(h)

Top-up disability payment

- defined, 6(17)
- not taxable as employee benefit, 6(18)
- reimbursement to employer, 8(1)(n.1)

Top-up percentage

- defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)

Top-up revenue reduction percentage

- defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)

- Toronto Stock Exchange**
- prescribed securities exchange investment, Reg. 9002.2
 - prescribed stock exchange, 262
- Total assets (of financial institution)**
- defined, 181(2), 190(1.1), Reg. 8600
- Total base period remuneration**
- defined, for Canada Recovery Hiring Program, 125.7(1)
- Total charitable gifts**
- credit for, 118.1(1)“total gifts”(a), 118.1(3)
 - defined, 118.1(1)
- Total corporate holdings percentage**
- defined, for private foundations, 149.1(1)
- Total Crown gifts**
- credit for, 118.1(1)“total gifts”(b), 118.1(3)
 - defined, 118.1(1)
- Total cultural gifts**
- credit for, 118.1(1)“total gifts”(c), 118.1(3)
 - defined, 118.1(1)
- Total current period remuneration**
- defined, for Canada Recovery Hiring Program, 125.7(1)
- “Total depreciation” defined, 13(21)**
- Total ecological gifts**
- credit for, 118.1(1)“total gifts”(d), 118.1(3)
 - defined, 118.1(1)
- Total pension adjustment reversal, *see also* Pension adjustment reversal**
- defined, 248(1), Reg. 8304.1
- Total per location expense**
- defined, for air quality improvement credit, 127.43(1)
- Total premiums**
- defined, Reg. 8600
- Total remuneration**
- defined, for a taxation year, Reg. 100(1)
- Total reserve liabilities (of financial institution)**
- defined, 181(2), 190(1.1), Reg. 8600
- Total return (from fixed payment obligation)**
- defined, Reg. 9100
- Total specified indebtedness**
- defined, for FAPI of banks, 95(2.43)
- Total ventilation expense**
- defined, for air quality improvement credit, 127.43(1)
- Totally and permanently disabled**
- defined, Reg. 8500(1)
- Tourism and Hospitality Recovery Program, 125.7(1)“base percentage”(l)(i)(B)(I), (m)(i)(B)(I)**
- Tourism relief (COVID), *see* Qualifying tourism or hospitality entity**
- Townsite costs**
- capital cost allowance, Reg. 1102(18) [repealed], Reg. Sch. II:Cl. 10(1)
 - deemed capital cost, 13(7.5)(a), Reg. 1102(14.2)
- Tracked entity**
- defined, 95(8)
- Tracked interest rules, *see* Foreign investment entity: tracked interests**
- Tracked policy pool**
- defined, 95(2)(a.21)(ii)
- Tracked property**
- defined, 142.2(1)“tracking property”
- Tracked property and activities**
- defined, 95(8)(a)
- Tracking arrangements**
- FAPI rules, 95(8)–(12)
- Tracking class**
- defined, 95(10)(b)
- Tracking interest**
- defined, 95(8)
- Tracking property**
- defined, for mark-to-market accounting rule changes, 142.51(1)
- Tractor**
- capital cost allowance, Reg. Sch. II:Cl. 10(a), Sch. II:Cl. 16(g)
- Trade, adventure in, *see* Adventure in the nature of trade**
- Trade, board of, *see* Board of trade**
- Trade-in**
- allocation of consideration, 13(33)
- Trade mark, representation expenses, 13(12), 20(1)(cc), 20(9)**
- Trade show organizer relief (COVID), Reg. 8901.1(2)(b)(xx)(A), *see also* Qualifying tourism or hospitality entity**
- Trade union, *see* Union**
- Trader, *see* Dealer (or trader)**
- Trader or dealer in securities**
- defined
 - for security transactions, Reg. 230(1)
- Tradesman, *see* Tradesperson**
- Tradesperson**
- eligible tool, meaning of, 8(6.1)
 - licensing exam fees, tuition credit, 118.5(1)(d)
 - tools expense, deduction, 8(1)(s)
- Trailers**
- capital cost allowance, Reg. Sch. II:Cl. 10(e)
 - rail suspension device for, Reg. Sch. II:Cl. 35(b)
- Train, *see* Railway**
- Training amount limit**
- defined, 122.91(2)
- Training courses**
- to care for infirm person, medical expense, 118.2(2)(1.8)
- Training credit, *see* Canada Training Credit**
- Tramway or trolley bus system**
- capital cost allowance, Reg. Sch. II:Cl. 4
 - defined, Reg. 1104(2)
- Transaction**
- defined
 - for general anti-avoidance rule, 245(1)
 - for hybrid mismatch arrangements, 18.4(1)
 - for notifiable transactions, 237.4(1), 245(1)
 - for reportable transactions, 237.3(1), 245(1)
 - for reporting uncertain tax treatment, 237.5(1), 245(1)
 - for section 160 avoidance planning, 160.01(1)
 - for transfer-pricing rules, 247(1)
 - information return re non-resident transactions, 233.1(1)
 - reportable, *see* Reportable transaction
 - series of, defined, 248(10)
 - with non-resident
 - extended reassessment period, 152(4)(b)(iii)
 - reporting requirement, 233.1
- Transfer**
- RRIF, from, *see* Registered retirement income fund: transfer from
- Transfer of business, *see* Sale: business**
- Transfer of forgiven amount (debt forgiveness rules), 80.04**
- Transfer of instalment payments, 221.2**
- Transfer of losses, *see also* Suspension of losses**
- deemed proceeds of disposition, 69(11)
- Transfer of property, *see also* Rollover**
- affiliated person, to, *see* Affiliated person
 - attribution rules, *see* Attribution rules
 - child, to
 - gain or loss deemed to be transferor’s, 75.1
 - controlled corporation, to

- Transfer of property (*cont'd*)
 - capital loss denied, 40(3.3), (3.4)
 - corporation, to
 - by partnership, 85(2)
 - partnership wound up, 85(3)
 - by shareholder, 85(1)
 - eligible property, 85(1.1)
 - to reduce income, 74.4(2)
 - outstanding amount, 74.4(3)
 - where benefit not granted to designated person, 74.4(4)
 - deferred profit sharing plan
 - from, 147(19)
 - family farm or fishing corporation or partnership, 70(9.2), (9.21)
 - *inter vivos*, 73(4), (4.1)
 - spouse trust, from, to children, 70(9.3), (9.31)
 - farm or fishing property, of, 73(3), (3.1)
 - to child, on death, 70(9), (9.01)
 - to parents, on death of child, 70(9.6)
 - inter vivos, to spouse or trust, 73
 - prescribed provincial laws, Reg. Part LXV
 - minor, to, 74.1(2), 74.5(1), (6)–(11)
 - repayment of, 74.1(3)
 - partnership, to, 97
 - registered disability savings plan, to another RDSP, 146.4(8), (9)
 - registered education savings plans, between, 146.1(2)(g.2), (i.2), 146.1(6.1)
 - registered pension plan, between benefit provisions, 147.3(14.1)
 - registered pension plan, from, 147.3
 - registered pension plan to annuity contract, 147.4
 - registered retirement savings plan, *see* Registered retirement savings plan: transfer
 - retirement compensation arrangement, to second RCA, 207.6(7)
 - revoked charity, by, 188(2)
 - spouse, to, 74.1(1), 74.5
 - death of taxpayer, on, 70(6)
 - deemed proceeds of disposition, 73
 - gain or loss, 74.2
 - repayment of, 74.1(3)
 - tax debtor, by, transferee liable, 160
 - trust, by
 - to another trust, 104(5.8), 248(1)“disposition”(e), (f), 248(25.1)
 - trust, to, 74.3, 74.5(9), (10), 75(3)
 - death of taxpayer, on, 70(6)
 - from another trust, 104(5.8), 248(1)“disposition”(e), (f), 248(25.1)
 - income imputed to transferor, 75(2)
 - unregistered pension plan, from, 60(j), 147.1(3)(a)
- Transfer payments**
 - tax, to provinces, 154
- Transfer price**
 - defined, 247(1)
- Transfer pricing (re non-residents), 247**
 - advance pricing agreements, Canada-U.S. Tax Treaty:Art. XXVI
 - anti-avoidance rules, 247, Canada-U.S. Tax Treaty:Art. IX
 - *bona fides* test, 247(2)(b)(ii)
 - CRA discretion to apply, 247(10)
 - capital adjustment, *see* Transfer pricing capital adjustment
 - capital setoff adjustment, *see* Transfer pricing capital setoff adjustment
 - contemporaneous documentation, 247(4)
 - deemed dividend to non-resident, 247(12)
 - guarantee for subsidiary excluded, 247(7.1)
 - income adjustment, *see* Transfer pricing income adjustment
 - income setoff adjustment, *see* Transfer pricing income setoff adjustment
 - loan to subsidiary excluded, 247(7)
 - order of applying rules, 247(2.1)
 - penalty, 247(3), (11)
 - royalties, Canada-U.S. Tax Treaty:Art. XII:7
 - secondary adjustments, 247(12)–(16)
- Transfer pricing capital adjustment**
 - defined, 247(1)
 - penalty, 247(3)(a)(i)(B)
- Transfer pricing capital setoff adjustment**
 - defined, 247(1)
 - reduces transfer pricing penalty, 247(3)(a)(iii)
- Transfer pricing income adjustment**
 - defined, 247(1)
 - penalty, 247(3)(a)(i)(B)
- Transfer pricing income setoff adjustment**
 - defined, 247(1)
 - reduces transfer pricing penalty, 247(3)(a)(iii)
- Transfer time**
 - defined, 132.2(1)“qualifying exchange”
- Transferee**
 - defined, re tax debt avoidance, 160(1), (5), 160.01(1)
- Transferee corporation**
 - defined, 55(1)“distribution”, 55(3.2)(h)
- Transferor**
 - defined, re tax debt avoidance, 160(1), (5), 160.01(1)
- Transferor trust**
 - defined, 107.4(2)
- Transferred capacity**
 - defined, for interest deduction restrictions, 18.2(1), (4), 248(1)
- Transferred policies**
 - defined, Reg. 1403(8)(b)
- Transit passes, *see* Public Transit Pass Credit**
- Transition amount**
 - accounting rule changes for financial institutions
 - defined, 142.51(1)
 - specified debt obligation
 - application on disposition of specified debt obligation, 142.4(6)(c)C, 142.4(7)
 - defined, 142.4(1), Reg. 9201
- Transition period**
 - defined, for SIFT stapled-security rules, 18.3(1)
- Transition property**
 - defined, 142.51(1)
- Transition year**
 - defined, for transitional accounting rules
 - financial institution, 142.51(1)
 - life insurer, 138(12)
 - non-life insurer, 12.5(1), Reg. 2400(1)
- Transitional assistance under Canada–U.S. auto pact, income, 56(1)(a)(v)**
- Transitional eligible proceeds**
 - defined, for rollover to RDSP on death, 60.02(1)
- Transitional prohibited investment benefit**
 - defined, 207.01(1)
 - reduced tax on RESP or RDSP benefit, 207.05(5)
 - reduced tax on RRSP or RRIF benefit, 207.05(4)
- Transitional prohibited property**
 - adjusted cost base of, 207.01(7)
 - defined, 207.01(1)
 - exchange of property, 207.01(12), (13)
 - marriage or common-law partnership breakdown, 207.01(10), (11)
 - prohibited investment, 207.01(8), (9)

Transitional reserve

- for corporate partnership income, 34.2(1)“specified percentage”, 34.2(11)

Transitional rules, *see also* Grandfathering

- 1972 reform, ITAR 7–68
- R.S.C. 1985 (5th Supp.), ITAR 69–79
- stapled securities, 18.3(1)“transition period”, 18.3(3)(a)

Transmission equipment

- capital cost allowance, Reg. Sch. II:Cl. 47
- defined (re energy conservation CCA), Reg. 1104(13)

Transmission pipeline

- capital cost allowance, Reg. Sch. II:Cl. 49
- pumping or compression equipment, Reg. Sch. II:Cl. 7(j)

Transparent affiliate

- defined, for FAPI, Reg. 5907(1.091)
- treatment of, Reg. 5907(1.092)

Transplants, organ or bone marrow

- medical expense, 118.2(2)(l.1)

Transport employee

- away-from-home expenses, deduction, 8(1)(g)

Transport trailer technician

- apprenticeship job creation credit, 127(9)“investment tax credit”

Transportation, *see also* International shipping

- delivered after the end of the year, reserve, 20(6)
- passengers or property, Canada-U.S. Tax Treaty:Art. VIII:3, 4

Transportation expenses

- allowance for, not income, 6(6)(b)
- as medical expenses, 118.2(2)(g)
- • deemed payment of, 118.2(4)

Transportation losses, *see* Fuel**Travel agency relief (COVID)**, Reg. 8901.1(2)(b)(iii), *see also* Qualifying tourism or hospitality entity**Travelling expenses**

- allowance for, when not income, 6(1)(b)
- employee’s, deduction for, 8(1)(h), (h.1)
- • certificate of employer, 8(10)
- • limitation, 8(4)
- food and entertainment on train, plane or bus, 67.1(4)(a)
- medical expense, as, 118.2(2)(h)
- northern Canada, residents of, 110.7(1)
- part-time employee’s, excluded from income, 81(3.1)
- salesperson’s, deduction for, 8(1)(f)
- • certificate of employer, 8(10)
- • limitation, 8(4)
- transport employee’s, 8(1)(g)

Treasurer, *see* Officer: corporation, of**Treasury bill**

- yield at maturity treated as interest, 16(3)

Treasury Board

- defined, 248(1)

Treaty, *see* Tax treaty**Treaty co-production (re Canadian film/video tax credit)**

- defined, Reg. 1106(3)

Treaty-exempt property

- defined, 116(6.1)
- purchaser’s notice on acquisition from non-resident, 116(5.01), (5.02)

Treaty-protected business

- defined, 248(1)
- losses, not usable against Canadian profits, 111(9)

Treaty-protected property

- acquisition from non-resident, purchaser’s notice requirement, 116(5.01), (5.02)
- cannot absorb forgiven amount, 80(1)“excluded property”
- defined, 248(1)

- losses, not usable against Canadian gains, 111(9)
- replacement property, 13(4.1)(d), 44(5)(d)

Treaty shopping, Canada-U.S. Tax Treaty:Art. XXIX-A**Trestle**

- capital cost allowance, Reg. 1100(1)(zb), Reg. Sch. II:Cl. 3
- separate classes, Reg. 1101(5f)

Triangular amalgamation, 87(9)**Triangular foreign merger**, 87(8), (8.1)**Triggering event**

- defined, for FAPI stub-period rules, 91(1.3)

Trip cost

- defined, for northern residents’ deduction, 110.7(6)

Trolley bus system, Reg. Sch. II:Cl. 4**Truck**

- capital cost allowance, Reg. Sch. II:Cl. 10(a), Sch. II:Cl. 16(g)

Truck and transport mechanic

- apprenticeship job creation credit, 127(9)“investment tax credit”

Truck driver

- away-from-home expenses, deduction, 8(1)(g)

Truck mechanic, *see* Apprentice: mechanic**Truck operators**

- income from cross-border trucking, Canada-U.S. Tax Treaty:Art. VIII:4
- income of, earned in a province, Reg. 2604
- income of corporation in a province, Reg. 409

Truss, as medical expense, 118.2(2)(i)**Trust (or estate)**, 104–108

- 21-year deemed disposition rule, 104(4), (5), (5.3)–(5.8)
- • payment of tax in instalments, 159(6.1)
- accumulating income of
- • deduction for amounts included in preferred beneficiary’s income, 104(12)
- • defined, 108(1)
- • election to include in preferred beneficiary’s income, 104(14), Reg. 2800
- additional units issued in payment, 107(2.11), (2.12)
- agent not included, 104(1)
- allocation of capital and income to different beneficiaries, 104(7.1), (7.2)
- alter ego, *see* Alter ego trust
- amateur athlete, for, *see* Amateur athlete trust
- amount deemed not paid to beneficiary, 104(13.1), (13.2)
- amount payable in taxation year, 104(24)
- annuity contract, interest in, 12.2
- Australian, *see* Australian trust
- balance-due day of, 248(1)“balance-due day”(a)
- bare, *see* Bare trust
- “beneficially interested” in, meaning of, 248(25)
- beneficiary, *see* Beneficiary: trust of
- benefits from, income, 12(1)(m), 105
- business investment loss, deduction from, 39(10)
- capital cost allowance, determination or designation of, 104(16) [repealed]
- capital gains of
- • allocated to beneficiary, 104(21)–(21.7)
- • net taxable, 104(21.3)
- capital interest in
- • acquisition of
- • • reduction of loss on property disposed of, 107(6)
- • • additions to, 53(1)(d.1)
- • • adjusted cost base
- • • • computation of, 53(1)(d.1)
- • • • deductions from, 53(2)(b.1), 53(2)(h)
- • cost amount of, 108(1)
- • cost of, 107(1.1)
- • defined, 108(1), 248(1)

- Trust (or estate) (*cont'd*)
 - disposition of, 107(1)
 - disposition of, on distribution by trust, 248(1)“disposition”(d), (h)
 - distribution in satisfaction of, 107(2)–(5), ITAR 36
 - effect of payment out of trust’s income or gains, 43(3)
 - fair market value of, 107.4(4)
 - partial disposition of, 43
 - rollover to another trust, 107.4(3)(j)
 - ceasing to act as agent of beneficiary, 248(1)“disposition”(b)(v)
 - commercial, *see* personal (*below*); Unit trust
 - created by will of taxpayer, meaning of, 248(9.1)
 - cumulative Canadian exploration expense
 - reduced by investment tax credit, 127(12.3)
 - customer/client compensation, for, exempt, 149(1)(w)
 - death benefits, flow-through to beneficiary, 104(28)
 - deduction in computing income, 104(6), 108(5)
 - deemed disposition of property, 104(4)
 - deemed proceeds and cost, 104(5)
 - deferred profit sharing plan, under, 147(7)
 - exempt, 149(1)(s)
 - defined
 - for non-resident trust rules, 104(1), 248(1)
 - for registered education plans, 146.1(1)
 - for specific trust rules, 108(1)
 - generally, 104(1), 248(1)
 - in Quebec, 248(3)
 - definitions, 108
 - designated beneficiary, defined, 210(1)
 - designated income, tax on, 210–210.3
 - deemed paid by beneficiary, 210.2(3)
 - designated income, defined, 210(1)
 - designations re partnerships, 210.2(4)
 - returns, 210.2(5)
 - tax payable, 210.2(1)
 - trustee’s liability, 210.2(6)
 - trusts excepted, 210(2)
 - where no designated beneficiaries, 210.3
 - designation of foreign income to beneficiaries, 104(22)–(22.4)
 - disposition of interest in, 106, 107
 - disposition of property to, capital loss nil, 40(2)(g)(iv)
 - distribution of property by, in satisfaction of capital interest, 107(2)–(5)
 - before death, anti-avoidance rule, 104(4)(a.2)
 - election not to distribute gains, 107(2.11), (2.12)
 - in settlement of debt, 107(4)
 - no capital loss on beneficiary’s capital interest, 43(3)
 - non-resident beneficiary, to, 107(5)
 - instalment obligation not increased, 107(5.1)
 - security to postpone payment of tax, 220(4.6)–(4.63)
 - distribution, tax on, *see* SIFT trust
 - dividend received by, allocation to beneficiary, 104(19), (20)
 - division of property among other trusts, 107.4(2)
 - election by, *see* Election(s): trust
 - eligible taxable capital gains, defined, 108(1)
 - employee, *see* Employee trust
 - employee life and health trust, 144.1, *see also* Employee life and health trust
 - employees’ charity
 - receipts, Reg. 3502
 - employees profit sharing plan, under, 144(2)
 - exempt, 149(1)(p)
 - environmental, *see* Qualifying environmental trust
 - exclusions for purposes of certain sections, 108(1)“trust”
 - financial institution, 142.2(1)“financial institution”(b)
 - foreign, *see* non-resident (*below*)
 - foreign immigration, *see* Immigration trust
 - foreign tax credit for beneficiaries, 104(22)–(22.4)
 - foreign tax credit re former resident, 126(2.22)
 - Hepatitis C, income of not taxable, 81(1)(g.3)
 - immigration, *see* Immigration trust
 - income interest in
 - cost of, 106(1.1)
 - deduction for, 106(1)
 - defined, 108(1)
 - disposition of, 106(2)
 - proceeds, 106(3)
 - personal trust, in, 108(1)“income interest”
 - “income” of, 108(3)
 - income of beneficiaries, 108(5)
 - income paid to non-resident, 212(1)(c), 212(11)
 - exemption, 212(9), (10)
 - income payable to beneficiary, deduction for, 104(6)
 - non-resident beneficiary, 104(7)
 - income trust, *see* Specified investment flow-through
 - Indian Residential Schools settlement, *see* Indian Residential Schools Settlement trust
 - information return, Reg. 204
 - early disclosure for public trust, Reg. 204.1
 - *inter vivos*
 - deemed creation, re non-profit association, 149(5)
 - defined, 108(1)
 - personal tax credits not available, 122(1.1)
 - tax payable by, 122
 - interest in, *see also* “beneficially interested” in (*above*)
 - adjusted cost base
 - additions to, 53(1)(d.1), (d.2), (l)
 - deductions from, 53(2)(b.1), (h), (i), (j), (q)
 - recomputation of, 53(4)–(6)
 - interest income of, 12(3)
 - investment tax credit, designation of, 127(7)
 - joint partner, *see* Joint spousal or common-law partner trust
 - joint spousal, *see* Joint spousal or common-law partner trust
 - life insurance policy, interest in, 12.2
 - loss property held by
 - reduction of loss on disposition by person acquiring capital interest, 107(6)
 - maintenance expenses, 105(2)
 - master, exempt from tax, 149(1)(o.4)
 - mine reclamation, *see* Qualifying environmental trust
 - minor, for, 104(18)
 - transfer of property to, 74.3, 74.5(9), (10)
 - multiple
 - basic exemption re minimum tax, 127.53(2), (3)
 - grouped together as one trust, 104(2)
 - mutual fund, *see* Mutual fund trust
 - non-discretionary, defined, 17(15)
 - non-resident, 94(1)“connected contributor”(a)
 - Canadian beneficiary liable for trust’s tax, 94(3)(d)(i)
 - Canadian contributor liable for trust’s tax, 94(3)(d)(i)
 - capital interest in cost base, deductions from, 53(2)(i)
 - commercial trust exemption, 94(1)“exempt foreign trust”(h)
 - deemed resident in Canada, 94(3)(a); *Income Tax Conventions Interpretation Act* s. 4.3
 - rental income from Canadian property, 216(4.1)
 - distribution from, disclosure, 233.5
 - information return, 233.2, 233.5
 - no deduction for income paid to non-resident or exempt beneficiary, 104(7)
 - reporting requirements, 233.2, 233.5
 - transfer of property to
 - constitutes disposition, 248(1)“disposition”(e)(iii), 248(25.1)
 - disclosure, 233.2
 - trust becoming, withholding tax triggered, 214(3)(f)(i)(C)
 - non-resident beneficiaries, 104(7)
 - non-residents, for

Index

- Trust (or estate) (*cont'd*)
 - payments to, 212(1)(c)
 - non-taxable dividends received by, designation re, 104(20)
 - option to acquire units in, 49(1)(c)
 - payment of duties and taxes, non-disqualification, 108(4)
 - pension benefits, flow-through of, 104(27)
 - pension fund or plan
 - exemption, 149(1)(o)
 - personal, *see* Personal trust
 - personal-use property of, 46(4)
 - pooled fund, *see* Pooled fund trust
 - post-1971 partner, *see* Post-1971 spousal or common-law partner trust
 - preferred beneficiary
 - defined, 108(1)
 - income of, 104(14), (15)
 - prescribed, Reg. 4800.1
 - capital interest in, defined, 108(1)“capital interest”(a)
 - distribution of property to beneficiary, 107(2), (4.1)
 - principal residence
 - disposed of to taxpayer, 40(7)
 - distribution by spouse trust, 107(2.01)
 - property transferred to
 - income imputed to transferor, 75(2)
 - income not imputed to transferor, 75(3)
 - proportional holdings in property of, 259
 - “qualified” defined, 259(3)
 - qualified investments, *see* Qualified investment
 - qualifying disposition, rollover, 107.4
 - qualifying environmental, *see* Qualifying environmental trust
 - reference to trustee, executor etc., 104(1)
 - registered education savings plan, under, 146.1(1)“trust”, 146.1(5)
 - exempt, 149(1)(u)
 - registered investment, 204.4–204.7
 - registered retirement income fund, exempt, 149(1)(x)
 - registered retirement savings plan, under, 146(4)
 - exempt, 149(1)(r)
 - registered supplementary unemployment benefit plan, exempt, 149(1)(q)
 - reinsurance, *see* Reinsurance trust
 - related segregated fund, Reg. 6100
 - reporting of beneficiaries, trustees, settlors and protectors starting 2022, Reg. 204.2(1)(a)
 - residence of, deemed, 250(6.1)
 - resource property
 - rules, 104(5.2)
 - retirement compensation arrangement, *see* Retirement compensation arrangement
 - return to be filed, 150(1)(c)
 - right of use or habitation (Quebec) deemed to be, 248(3)
 - rollover of property on transfer to other trust, 107.4
 - rollover to another trust, 248(1)“disposition”(e), (f)
 - scientific research tax credit, 127.3(3)
 - segregated fund, Reg. 6100
 - self, for, *see* Alter ego trust
 - self-benefit, *see* Alter ego trust
 - settlor, defined, 108(1)
 - small business investment, Reg. 5103
 - spouse, for, 70(6)(a), 73(1.01)(c), 104(4)(a), *see also* Joint spousal or common-law partner trust; Post-1971 spousal or common-law partner trust
 - deduction from taxable income of, 110.6(12)
 - deemed disposition, 104(4)
 - distribution by, in satisfaction of capital interest, 107(4)
 - double taxation relief, Canada-U.S. Tax Treaty:Art. XXVI:3(g)
 - family farm corporation transferred from, to children, 70(9.3), (9.31)
 - family fishing corporation transferred from, to children, 70(9.3), (9.31)
 - farm or fishing property transferred from, to children, 70(9.1), (9.11)
 - farm property transferred from, to children, 70(9.1)
 - how created, 70(6), 70(7), 73(1.01)
 - indefeasible vesting of property in, 70(6)
 - not disqualified by certain payments, 108(4)
 - principal residence
 - disposed of to, 40(4)
 - distribution by, 107(2.01)
 - exemption, 54“principal residence”(c.1)(iii.1)(A)
 - property of, 40(5)
 - property transferred to, *inter vivos*, 73(1)
 - capital cost, and deemed allowance, 73(2)
 - reserves allowed to, for year of taxpayer’s death, 72(2)
 - special rules applicable, 70(7), (8)
 - together with self, *see* Alter ego trust
 - transfer of property to, 74.3, 74.5(9), (10)
 - transfer or distribution to, on death of taxpayer, 70(6)
 - value of property acquired, 70(6), 73
 - status of, Reg. Part XLVIII
 - substitution (Quebec) deemed to be, 248(3)
 - supplementary unemployment benefit plan, under, 145(2)
 - tax paid under Part XII.2
 - credit for, included in beneficiary’s income, 104(31)
 - deduction for, 104(30)
 - tax re property held by, 207.1
 - taxable dividends received by
 - designation re, 104(19)
 - payable to non-resident beneficiary, 82(1)(e)
 - taxed as individual, 104(2)
 - testamentary, *see* Graduated rate estate for most rules starting 2016
 - defined, 108(1)
 - transfers to, for minor or spouse, 74.5(9), (10)
 - trustee of, *see* Trustee
 - unit, *see* Unit trust
 - usufruct (Quebec) deemed to be, 248(3)
 - vacation pay, exempt, 149(1)(y)
 - voting, Reg. 4800.1(c)
 - windup of, deemed resident, 250(6.1)
- Trust account number**
 - defined, 248(1)
 - disclosure of, offence, 239(2.3)
 - failure to provide, penalty, 162(6)
 - information return requiring, reasonable effort required to obtain, 237(2)(a)
 - must be provided in return and to person required to report it, 237(1.1)
- Trust and loan corporations**
 - taxable income earned in a province, Reg. 405
- Trust company**, *see also* Financial institution
 - defined, for FAPI purposes, 95(1)
- Trust loss trading**, 251.2
- Trustee**, *see also* Legal representative; Trust (or estate)
 - change of, whether change in control of corp owned by trust, 256(7)(i)
 - deemed to be legal representative, 248(1)“legal representative”
 - in bankruptcy, *see* Bankruptcy: trustee in
 - information return, Reg. 204
 - liable for Part X tax, 198(3)
 - liable for Part XII.2 tax, 210.2(6)
 - obligations of, 159
 - public, disposition of Canadian securities, 39(5)(c)
 - reported to CRA starting 2022, Reg. 204.2(1)(a)
 - return required of, 150(3)
 - penalty for failure to file, 162(3)

- Trustee (*cont'd*)
- school board, expense allowance exempt, 81(3) [before 2019]
 - school supplies, 122.9
 - shares held by, for employee, 7(2)
 - shares purchased by, for employees of corporation, 7(6)
 - teacher school supplies, 122.9
 - withholding tax, liability for, 227(5), (5.1)(a)

Tuition fees

- adult basic education, *see* Adult basic education
- credit for, 118.5, 122.91
- • ancillary fees, 118.5(3)
- • commuter's, 118.5(1)(c)
- • deemed residents, 118.5(2)
- • in Canada, 118.5(1)(a)
- • outside Canada, 118.5(1)(b)
- • unused
- • • transfer to spouse, 118.8
- • • transfer to supporting person, 118.9
- T2202 information return must be issued to student, Reg. 203

Tuition, textbook and education tax credits transferred

- defined, 118.81

Tunnel, capital cost allowance. Reg. Sch. II:Cl. 1(j)**Turbine,** *see* Combustion turbine**Tutoring service**

- disability supports deduction, 64(a)A(ii)(H)
- medical expense credit, 118.2(2)(l.91)

Twentieth qualifying period (etc.)

- defined, for CEWS, 125.7(1)“qualifying period”

Twenty-one years

- deemed realization of trust gains, 104(4), (5), (5.3)–(5.8)

Twinning arrangement

- defined, for Canadian film/video credit, Reg. 1106(1)

Two-year rolling start rule

- when property available for use, 13(27)(b), 13(28)(c), 13(29)

Tyco-Pentair spinoff, Reg. 5600(g)**U****UCC,** *see* Undepreciated capital cost**UHT,** *see* Underused housing tax**UI,** *see* Unemployment insurance**UN,** *see* United Nations and its agencies**US,** *see* United States**USD (US Dollars)**

- defined, for Common Reporting Standard, 270(1)

Ultimate funder

- defined, for back-to-back shareholder loan rules, 15(2.192), 212(3.8)
- election by, 212(3.22)

Ultimate licensor

- defined, for non-resident withholding tax back-to-back rules, 212(3.94)

Ultimate parent

- defined, for alternative interest-deduction restrictions, 18.21(1), (4)
- entity, *see* Ultimate parent entity

Ultimate parent entity

- defined, for country-by-country reporting, 233.8(1)

Unaffiliated publicly traded liability

- defined, for SIFT trust definition, 122.1(1)

Unamortized bond premium

- reserve for, *see* Reserve: unamortized bond premium

Unanticipated Surpluses Act, *see* Budget surplus**Uncertain tax treatment,** 237.5

- information return required, 237.5(2)
- • filing deadline, 237.5(3)

- • penalty for failure to file, 237.3(5)
- • reassessment deadline 3 years after filed, 152(4)(b.7)

Uncle, *see also* Niece/nephew

- defined, 252(2)(e)
- dependent, 118(6)(b)
- great-uncle defined, 252(2)(f)

Undepreciated capital cost, *see also* Capital cost; Depreciable property

- defined, 13(21)
- exceeding fair market value at time of transfer, 13(21.2), 20(16)
- reduction on debt forgiveness, 80(5)(b)
- transferred property, 13(5)

Underground piping

- well for installation of, Reg. 1219(1)(f), Sch. II:Cl. 43.1(d), Sch. II:Cl. 43.2(b)

Underlying foreign tax applicable (of foreign affiliate)

- defined, Reg. 5907(1)

Underlying foreign tax (of foreign affiliate)

- defined, Reg. 5907(1)

Underlying payment (securities lending arrangement)

- defined, for securities lending arrangement, 260(1)
- on qualified security, 260(5), (5.1)
- • no deduction, 18(1)(w)

Underlying return

- defined, for hybrid mismatch arrangement rules, 18.4(14)(d)(i)

Underpayment amount

- defined, for corporate interest offset, 161.1(1)

Undertaking future obligations

- deduction for, 20(24)

Underused housing tax, 115(1)(b) [Proposed Amendment]**Underused Housing Tax Act**

- interest paid under, non-deductible, 18(1)(t)
- reappropriation of income tax payment to amount payable under, 221.2(2)
- returns must be filed for income tax refund to be paid, 164(2.01)

Undivided interest

- in property transferred by tax debtor, fair market value, 160(3.1)

Undue benefit (conferred by charity on any person)

- defined, 188.1(5)
- penalty, 188.1(4)

Undue delay, *see* Delay**Undue hardship**

- reduction in security to be posted on emigration, 220(4.7), (4.71)
- reduction in source withholdings, 153(1.1)
- • payments to actors, 212(5.3)
- refund instalments, 164(1.51)–(1.53)

Unearned commissions

- reserve for, 32

Unemployment insurance, *see* Employment insurance**Unenforceable debt,** *see* Statute-barred debt, deemed settled**Ungulates, grazing,** 80.3(1)“breeding animals”**Uniforms, capital cost allowance,** Reg. Sch. II:Cl. 12(i)**Unincorporated association or organization,** *see* Non-profit organization**Union**

- election by, re foreign pension plan, Reg. 6804(3)
- exemption, 149(1)(k)
- information return required, 149.01 [repealed]
- locals and branches deemed to be one employer for pension purposes, 252.1
- membership dues
- • deduction for, 8(1)(i)(iv), (v)

Union (*cont'd*)

- where not deductible, 8(5)
- strike pay taxed or exempt? no legislative reference
- venture capital, *see* Labour-sponsored venture capital corporation (LSVCC)

Unit

- mutual fund trust, *see* Mutual fund trust: unit of
- trust, *see* Unit trust

Unit trust, *see also* Mutual fund trust

- adjusted cost base of unit, 53(1)(d.2), 53(2)(h), (j)
- annuity contract, interest in, 12.2
- “block of units” defined, Reg. 4803(1)
- defined, 108(2), 248(1)
- excluded from various trust rules, 108(1)“trust”(f)
- expenses of issuing or selling, 20(1)(e)
- issuance of unit, whether deductible to trust, 143.3(4)
- life insurance policy, interest in, 12.2
- non-resident
 - adjusted cost base of unit, 53(2)(j)

United Kingdom, *see also* Foreign government

- currency of, use as functional currency, 261(1)“qualifying currency”(c)
- defined, *Interpretation Act* 35(1)
- stock exchange recognized, Reg. 3201(n)
- Tax Convention, *see* Table of Contents
- universities, gifts to, Reg. Sch. VIII, s. 2
- war pension exempt, 81(1)(e)

United Mexican States, *see* Mexico**United Nations and its agencies**

- agency of, excluded from non-resident trust rules, 94(1)“exempt foreign trust”(c)(i)
- donation to, 149.1(1)“qualified donee”(d)
 - by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
- employment income from
 - deduction, 110(1)(f)(iii)

United States, *see also* Foreign government; Non-resident

- absorptive merger, 87(8.2)
- artiste or athlete, Canada-U.S. Tax Treaty:Art. XVI
- citizens, reporting obligations to IRS, 233.3(3) (Notes)
- collection of Canadian tax by IRS, Canada-U.S. Tax Treaty:Art. XXVI A
- commuter to, *see* Commuter to United States
- corporate spin-off, *see* Foreign spin-off
- currency of, use as functional currency, 261(1)“qualifying currency”(a)
- defined, 19(5), *Interpretation Act* s. 35(1)
 - for treaty purposes, Canada-U.S. Tax Treaty:Art. III:1(b)
- dividends, Canada-U.S. Tax Treaty:Art. X
- donations to charities in, Canada-U.S. Tax Treaty:Art. XXI:7; 118.1(9)
- estate taxes, Canada-U.S. Tax Treaty:Art. XXIX-B
- federal taxpayer identifying number, penalty for failure to provide, 162(6)
- franchise payment to resident of, Canada-U.S. Tax Treaty:Art. XII:3(c)
- gambling losses in, Canada-U.S. Tax Treaty:Art. XXII:3
- global intangible low-taxed income (GILTI)
 - application to US citizens in Canada, 128.1(1) (Notes)
 - effect on hybrid mismatch rules, 18.4(1)“specified minimum tax regime”(a)
- government, employees of, Canada-U.S. Tax Treaty:Art. XIX, XXVIII
- green card holder, Canada-U.S. Tax Treaty:Art. IV:1
- Individual Retirement Account, *see* Foreign retirement arrangement
- interest, Canada-U.S. Tax Treaty:Art. X
- Internal Revenue Service, *see* Internal Revenue Service (U.S.)

- limitation on treaty benefits, Canada-U.S. Tax Treaty:Art. XXIX-A
- limited liability company, *see* Limited liability company
- moving to, Canada-U.S. Tax Treaty:Art. XIII:6
- Nature Conservancy, prescribed donee, Reg. 3504
- newspaper or periodical printed in, 19(1)(b)
- pensions, Canada-U.S. Tax Treaty:Art. XVIII
 - pension credit under tax treaty, Reg. 8308.1(2.1)
- RRSP deferral, Canada-U.S. Tax Treaty:Art. XVIII:7
- *Railroad Retirement Act* Tier 1 benefits, Canada-U.S. Tax Treaty:Art. XVIII:5
- Real Estate Investment Trust, {Canada-U.S. Tax Treaty:Art. X:7(c)}
- Real Estate Mortgage Investment Conduit, Canada-U.S. Tax Treaty:Art. XI:9
- real property interest, Canada-U.S. Tax Treaty:Art. XVIII:3
- Regulated Investment Company, *see* Regulated Investment Company (U.S.)
- royalties paid to resident of, Canada-U.S. Tax Treaty:Art. XII
- S corporation, Canada-U.S. Tax Treaty:Art. XXIX:5
- social security benefits, Canada-U.S. Tax Treaty:Art. XVIII:5
 - grandfathering where received since before 1996, 110(1)(h)
- social security taxes, Canada-U.S. Tax Treaty:Art. XXIV:2(a)(ii)
 - credit against Canadian tax, 122.7
 - state income tax, 126(5), (7)
- stock exchanges recognized, Reg. 3201(o)
- stock options, Canada-U.S. Tax Treaty:Fifth Protocol (2007), Annex B, para. 6
- Tax Convention, *see* Table of Contents
- university, gift to, Reg. 3503, Sch. VIII, Canada-U.S. Tax Treaty:Art. XXI:7

United States tax

- defined, Canada-U.S. Tax Treaty:Art. III:1(d)

Unitized oil or gas field in Canada

- Canadian oil and gas property expense, 66(12.5)
- exploration and development expenses, 66(12.2), (12.3)

Universal Child Care Benefit (pre-July 2016), *see also* Canada Child Benefit

- disclosure of information by CRA to administer, 241(4)(d)(vii.4)
- does not affect Canada Child Benefit, 122.6“adjusted income”
- does not affect GST Credit, 122.5(1)“adjusted income”
- does not create OAS clawback, 180.2(1)“adjusted income”
- information return required, Reg. 200(6)
- no attribution if transferred to child, 74.1(2)
- paid for earlier years, averaging of income, 56(8)
- repayment of, deductible, 60(y)
- single parent, designation to include UCCB in child’s income, 56(6.1)
 - effect of designation, 56(6)(c)
 - taxable, 56(6)
 - text of Act, 56(6) (Notes)

University

- fees, *see* Tuition fees
- information return for tuition or scholarship, Reg. 203
- outside Canada, prescribed, Reg. 3503, Reg. Sch. VIII
 - donation to, 149.1(1)“qualified donee”(a)(iv)
 - by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
 - trust for, exempt from non-resident trust rules, 94(1)“exempt foreign trust”(c)(ii)
- U.S., *see* United States: university

Unlimited liability company, *see* Nova Scotia: unlimited liability company**Unpaid amount**

- general rules, 78
- investment tax credit limitation, 127(26)

- Unpaid amount (*cont'd*)
- tax shelter investment, 143.2(1)“limited-recourse amount”, 143.2(6)
- Unpaid claims reserve**, *see* Insurance corporation: reserve for unpaid claims
- Unrealized proceeds of disposition**, 40(1)(a)(iii)
- Unreasonable amount**
- expense, no deduction for, 67
 - paid by non-resident, 247
 - paid to non-resident, 247
- Unrecognized loss**
- debt forgiveness rules
 - defined, 80(1)
 - use of to limit income inclusion, 80(13)D(a)(i)
 - straddle transaction rules
 - defined, 18(17)
- Unrecognized profit (straddle transaction rules)**
- defined, 18(17)
- Unrelated group, defined**, 251(4)
- Unstapling of securities, anti-avoidance**, 12.6
- Unused Canadian property mutual fund loss**
- defined, 218.3(1)
- Unused foreign tax credit**, *see* Foreign tax credit: unused
- Unused non-deductible PRPP room**
- defined, 147.5(1)
 - increases unused RRSP deduction room, 146(1)“unused RRSP deduction room”(b)D(iv)
- Unused portion of a beneficiary’s exempt capital gains balance**
- defined, 144(1)
- Unused RRSP deduction room**
- defined, 146(1), 248(1)
 - effect on excess RRSP contributions, 204.2(1.1)(b)A
 - effect on RRSP deduction limit, 146(1)“RRSP deduction limit”A
- Unused surtax credit**
- defined, 181.1(6), 190.1(5)
 - reduces Part VI tax, 190.1(6)
- Unused TFSA contribution room**
- defined, 207.01(1)
 - contributions over, 207.01(1)“excess TFSA amount”
- Unused tuition, textbook and education tax credits**
- defined, 118.61(1)
- Upgrading development phase (of oil sands project)**
- defined, Reg. 1104(2)
- Upper-tier affiliate**
- defined, 95(1)“participating percentage”(b)(i)(B), Reg. 5905(13)(a)(ii)
- Upstream deposit (of eligible Canadian bank)**
- credit to offset Part XIII withholding tax on, 125.21
 - defined, for FAPI of banks, 90(15), 95(2.43)
 - excluded from upstream loan income inclusion, 90(8)(d)
 - treatment of, for upstream loan rules, 90(8.1)
- Upstream loans**
- foreign currency adjustment set-off on repayment until 2016, 39(2.1), 95(2)(g.04)
 - transitional setoff election, 39(2.3)
 - from foreign affiliate, included in income, 90(6)–(15)
 - continuity on reorganizations, 90(6.1), (6.11)
- Use, right of (Quebec)**
- deemed to be trust, 248(3)
- Use of property**, *see* Production or use
- Usufruct (Quebec)**
- deemed to be trust, 248(3)
 - defined
 - *Quebec Civil Code*, art. 1120–1171

Utensils, *see* Kitchen utensils

Utilities

- service connection, deduction, 20(1)(ee)

V

V-day, *see* Valuation day

VDP, *see* Voluntary disclosure program

VPLA, *see* Variable payment life annuity

VPLA benefits

- allowed for pooled registered pension plan, 147.5(5)(a)
- allowed for registered pension plan, Reg. 8506(1)(e.2)

VPLA fund

- defined, Reg. 8506(13)

Vacant home tax, *see* Underused housing tax

Vacant housing, *see* Underused housing tax

Vacant land

- limitation on deductions, 18(2)–(3.7)

Vacation pay trust

- exemption, 149(1)(y)

Validity of *Income Tax Act*, 2(1) (Notes)

Valuation activity

- defined, for third-party penalty, 163.2(1)

Valuation costs

- added to cost base of property, 53(1)(n)

Valuation day

- defined, ITAR 24
- fair market value on, election by individual to use, Reg. 4700
- property held since before
- capital property, ITAR 26(3)
- depreciable property, ITAR 20(1)
- publicly-traded shares and securities on, Reg. Sch. VII

Valuation of inventory, *see* Inventory: valuation of

Value, *see also* Fair market value

- defined, for insurers regulations, Reg. 2400(1)

Value-added tax, *see* Goods and services tax (GST)

Van

- deemed not to be automobile, 248(1)“automobile”(e)
- wheelchair access, medical expense credit, 118.2(2)(1.7)

Vancouver

- international banking centre until 2013, 33.1(3)
- 2010 Olympics, *see* Olympic Winter Games 2010

Vancouver Stock Exchange, *see also* TSX

- prescribed stock exchange, 262

Variable benefits

- pooled registered pension plan, 147.5(5)(a)
- registered pension plan, Reg. 8506(1)(e.1)
- non-payment of minimum amount, Reg. 8506(4)–(6)

Variable payment life annuity

- allowed as pooled registered pension plan benefit, 147.5(5)(a)
- allowed as registered pension plan benefit, Reg. 8506(1)(e.2)
- defined, Reg. 8506(1)(e.2)
- VPLA fund, Reg. 8506(13)

Variation of trust, effect of, 108(6)

Vatican City, *see also* Foreign government

- universities, gifts to, Reg. Sch. VIII, s. 7

Vats, capital cost allowance, Reg. Sch. II:Cl. 8

Veekans Poultry case overruled, 67.6

Vehicle, *see also* Automobile; Motor vehicle; Passenger vehicle

- cost over \$100,000, *see* Luxury Items Tax
- device to permit person with mobility impairment to drive
- medical expense, Reg. 5700(n)
- mechanic, *see* Apprentice: mechanic

Vehicle charging station

- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xvii)

- Ventilation expense**, *see* Air quality improvement credit
- Venture capital corporation, prescribed**, *see also* Labour-sponsored venture capital corporation (LSVCC)
- assistance, Reg. Part LXVII
 - defined, Reg. 6700
 - disposition of shares of
 - capital loss, 40(2)(i)
 - exempt from Part IV tax, 186.2
 - in definition of Canadian-controlled private corporation, 125(7)
 - labour-sponsored, defined, Reg. 6701
 - may control private corporation, 89(1)“private corporation”
 - prescribed assistance, Reg. 6702
 - shares of
 - prescribed assistance, deduction from cost base, 53(2)(k)(i)(C)
- Verification**, *see* Audit
- Vertical amalgamation**
- carryback of losses, 87(2.11)
 - deemed cost of capital properties, 87(11)(b)
 - deemed proceeds from subsidiary’s shares, 87(11)(a)
- Vertical (short-form) amalgamation**, *see also* Amalgamation
- carryback of losses, 87(2.11)
- Vessel**
- capital cost allowance, Reg. 1100(1)(v), Reg. Sch. II:Cl. 7
 - separate classes, Reg. 1101(2)–(2b)
 - exclusion where structured financing facility, Reg. 1101(2c), Sch. II:Cl. 41(b)
 - certified
 - capital cost allowance, Reg. 1100(1)(v)
 - conversion cost deemed separate class, 13(14), (17)
 - defined, 13(21)
 - deposit under *Canadian Vessel Construction Assistance Act*
 - disposition of, 13(19), (20)
 - disposition of, election, 13(16)
 - fishing, additional capital cost allowance, Reg. 1100(1)(i)
 - quadrennial survey, reserve for, 20(1)(o), Reg. 3600
 - reassessment in certain cases, 13(18)
 - transfer of, under, *Canadian Vessel Construction Assistance Act*
 - recapture of depreciation, 13(13)
- “Vested indefeasibly”**
- meaning of, 248(9.2)
- Vesting year**
- defined, for stock option limit rules, 110(0.1)
- Veterans’ pensions**, *see also* Canadian Forces and veterans
- exempt, 81(1)(d), (e)
- Veterans Well-Being Act**
- certain payments exempt, 81(1)(d.1)
 - certain payments taxable, 6(1)(f.1)
 - disclosure of taxpayer information for administration of, 241(4)(d)(viii)
 - income replacement benefit, whether taxable, 56(1)(a)(viii)
 - retirement income security benefits under
 - eligible for pension income credit, 118(3)B(b)(ii)
 - eligible for pension income splitting, 60.03(1)“eligible pension income”(c)
- Veterinarian**, *see* Professional practice
- VIA Rail**, *see also* Railway
- subject to tax, 27(2), Reg. 7100
- ViaVoice software**
- disability supports deduction, 64(a)A(ii)(G)
 - medical expense credit, 118.2(2)(1.42)
- Vibratory signalling device for the hearing-impaired**
- medical expense credit, Reg. 5700(q.1)
- Victims of crime**
- compensation payments exempt, 81(1)(q), Reg. 6501
- Video game arcade relief (COVID)**, Reg. 8901.1(2)(b)(ix)(A)(IV), (b)(xv), *see also* Qualifying tourism or hospitality entity
- Video games**
- capital cost allowance, Reg. Sch. II:Cl. 16(f)
- Video laser-disk**, *see* Digital video disk (DVD)
- Video tapes**
- film or video production services credit, 125.5
- Visa Inc.**
- prescribed payment card corporation share, Reg. 9002.1(a)(iii)
- Viscosity**
- hydrocarbons, determination of, Reg. 1107
- Visitor to Canada**
- 183 days, deemed resident, 250(1)(a)
- Visual signalling device for the hearing-impaired**
- medical expense credit, Reg. 5700(q.1)
- Vitamin B12, as medical expense**, 118.2(2)(k)
- Voice recognition software**
- disability supports deduction, 64(a)A(ii)(G)
 - medical expense credit, 118.2(2)(1.42)
- Voluntary disclosure program**, 220(3.1) (Notes)
- Volunteer**
- emergency worker
 - exemption from employment income, 81(4)
 - firefighter, *see* Firefighter: volunteer
 - search and rescue, *see* Search-and-rescue volunteer
- Volunteer business exemption**
- charities, 149.1(1)“related business”
- Volunteer firefighter**, *see* Firefighter
- Voting trust**, Reg. 4800.1(c)
- W**
- WADA**, *see* World Anti-Doping Agency
- WCB payment**, *see* Workers’ compensation payment
- WEBS**
- qualified investments for deferred income plans, Reg. 4900(1) (Notes)
- WITB**, *see* Working Income Tax Benefit
- WSIB payment**, *see* Workers’ compensation payment
- Wage Earner Protection Act**
- benefit under
 - treated as employment income
 - for Canada Employment Credit, 118(10)B(b)
 - for Canada Workers Benefit, 122.7(1)“working income”(b)
 - for moving expenses, 62(1)(c)(i)
 - for RRSP earned income, 146(1)“earned income”(b)
 - for refundable medical expense supplement, 122.51(1)“eligible individual”(c)(iii)
 - taxable, 56(1)(r)(v)
 - to non-resident as income earned in Canada, 115(1)(a)(iii.21)
- Wage measure**
- defined, 147.1(1)
 - used in calculating “average wage”, 147.1(1)
- Wage subsidy**, *see* Canada Emergency Wage Subsidy (CEWS)
- Wagering losses**, Canada-U.S. Tax Treaty:Art. XXII:3
- Wages**, *see* Salary
- Wagon, capital cost allowance**, Reg. Sch. II:Cl. 10(d)
- Waiver**
- penalty or interest, of, by Minister, 220(3.1)
 - pension plan conditions, by Minister, 147.1(18)(a), (k)
 - RESP age requirements, where beneficiary disabled, 146.1(2.2)
 - reassessment period, of, by taxpayer, 152(4)(a)(ii), 152(4)(c), 152(4.1), (5)
 - requirement to file form or document, of, by Minister, 220(2.1)

Waiver (*cont'd*)

- retention of document or thing seized, by Minister, 231.3(6)
- right to appeal, binding, 169(2.2)
- right to object, binding, 165(1.2), 169(2.2)
- solicitor-client privilege, of, by client, 232(14)
- tax on excess EPSP amount, 207.8(3)
- tax on overcontribution to deferred income plan, by Minister, 204.1(4)
- tax on overcontribution to RESP, 204.91(2)
- tax on overcontribution to TFSA, 207.06(1)
- tax on TFSA, RRSP, RRIF, RESP or RDSP acquiring prohibited or non-qualified investment or extending advantage, 207.06(2)

Walking aids

- medical expense, Reg. 5700(i)

War savings certificate, income exempt, 81(1)(b)**War service**

- pension payments for, exempt, 81(1)(d), (e)

War Veterans Allowance Act

- pension under, exempt, 81(1)(d)

Warehousing of flow-through expenses, 66(19)**Warnock case overruled**, 118.2(2.21)**Warrant**, *see* Option; Search warrant**Warranty**

- amount receivable for, on sale of property, 42
- disposition of property subject to, 42
- outlays, pursuant to
 - on amalgamation, 87(2)(n)
 - reserve for, not allowed, 20(7)

Water

- distribution of, by municipal corporation, exemption, 149(1.2)

Water distributing equipment

- capital cost allowance, Reg. Sch. II:Cl. 1(o), Sch. II:Cl. 2(e)

Water purifier

- medical expense credit for, Reg. 5700(c.1)

Water system for mine

- capital cost allowance, Reg. Sch. II:Cl. 10(1)

Wave or tidal energy, electricity generation equipment

- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xiv), Sch. II:Cl. 43.2

Weak currency debt

- defined, 20.3(1)
- limit on interest deduction, 20.3(2)

Wearing apparel for rental

- capital cost allowance, Reg. Sch. II:Cl. 12(k)

Webb case (1974) overruled, 64.1**Wedding planning or hosting relief (COVID)**, Reg.

- 8901.1(2)(b)(xx)(B), *see also* Qualifying tourism or hospitality entity

Weighted Canadian liabilities

- defined, insurers, Reg. 2400(1)

Weighted total liabilities

- defined, insurers, Reg. 2400(1)

Wel Holdings case overruled, 244(13.1) [repealed]**Welder**

- apprenticeship job creation credit, 127(9)“investment tax credit”

Welfare, *see* Social assistance payment**Well**

- for installation of underground piping, Reg. 1219(1)(f), Sch. II:Cl. 43.1(d), Sch. II:Cl. 43.2(b)

Western Grain Stabilization Act

- fees paid, deductible, 20(1)(ff)
- payment received under, income, 12(1)(p)

Wharf, capital cost allowance, Reg. Sch. II:Cl. 3, Sch. II:Cl. 6

- for mine, Reg. Sch. II:Cl. 10(1)

Wheelchair

- medical expense, 118.2(2)(i)
- power-operated lift for, Reg. 5700(m)
- ramp for
 - deduction, 20(1)(qq)
 - medical expense credit, 118.2(2)(1.2)
- van for use with, medical expense credit, 118.2(2)(1.7)

Whistleblower payments, *see* Stop International Tax Evasion Program**Whole dividend (of foreign affiliate)**

- defined, Reg. 5907(1)

Wholly-owned corporation, *see also* Subsidiary: wholly-owned corporation

- defined, for corporate rollover rules, 85(1.3)

Wife, *see* Spouse**Wig, medical expense**, Reg. 5700(a)**Wild (1245989 Alberta) case overruled**, 245(1)“tax benefit”(c)**Will**

- gifts by deemed made in year of death, 118.1(5) [before 2016], 118.1(5.1) [after 2016]
 - publicly traded securities, reduced capital gain, 38(a.1)(ii)
- transfer, release or surrender under, 248(8)
- trust created by, 248(9.1)

Wind energy conversion system

- Canadian renewable and conservation expense, Reg. 1219(4)

Wind farm project

- test wind turbine at, *see* Test wind turbine

Wind turbine, *see* Test wind turbine**Winding-up**, *see also* Amalgamation (for specific consequences); Ceasing to carry on business

- acquisition of control because of death, 88(1)(d.3)
- appropriation of property on, 69(5), 84(2)
- assets acquired from foreign affiliate on, 80.1(6)
- bump, 88(1)(c), (d)
 - bump denial rule, 88(1)(c)(vi)
- Canadian corporation, rules, 88(1), (2)
- corporation beneficiary under life insurance policy, 89(2)
- debt, settlement of, 80.01(4), (5)
- debt forgiveness reserve disallowed, 61.4(c)
- distribution on, 84(2), (6)
- farming inventory, 88(1.6)
- financial institution
 - continuing corporation for mark-to-market rules, 88(1)(h)
 - deemed disposition of mark-to-market property, 88(1)(i)
 - into parent financial institution, 88(1)(a.3)
- following debt forgiveness, deemed capital gain, 80.03(3)(a)(i)
- foreign affiliate, 88(3), 95(2)(e)
- functional currency rules, 261(16)
- leasing properties, 16.1(4)
- net capital losses of subsidiary, 88(1.2)
- 90% or more owned subsidiary, of, 88(1)
 - limited partnership losses, 88(1.1)
 - net capital losses, 88(1.2)
 - non-capital losses, 88(1.1)
 - parent corporation continuation of, 88(1.5)
 - non-capital losses, treatment by parent, 111(5.4)
- parent incorporated after subsidiary’s year-end
 - computation of income and tax payable, 88(1.3)
- partnership, *see* Partnership: ceasing to exist
- period (of revoked charity), *see* Winding-up period
- pre-1972 capital surplus on hand, 88(2.1)–(2.3)
- refundable dividend tax on hand, 87(2)(aa), 88(1)(e.2)
- resource expenses, 66.7(6)
- specified debt obligation, treatment of, 88(1)(a.3), Reg. 9204(2)

Index

- Winding-up (*cont'd*)
- subsidiary, of
 - non-capital losses, treatment by parent, 111(5.4)
 - where an insurance corporation, 88(1)(g)
 - trust, of
 - deemed resident throughout year, 250(6.1)
- Winding-up period**
- revoked charity, defined, 188(1.2)
- Windmill, capital cost allowance**, Reg. Sch. II:Cl. 3
- Windup**, *see* Winding-up
- Winnipeg Stock Exchange**, *see also* TSX
- prescribed stock exchange, 262
- Wipf case overruled**, 143
- Withholding**, 153(1), 212, 227, *see also* Remittance of taxes withheld
- actors, non-resident, 212(5.1)–(5.3)
 - agreement not to withhold, void, 227(12)
 - amount of, deemed received by payee, 153(3)
 - amounts deemed held in trust, 227(4), (4.1)
 - amounts in trust not part of estate, 227(5)
 - amounts not remitted, liability to pay, 227(9.4)
 - annuity payment or commutation, 153(1)(f)
 - assessment for, 227(10), (10.1)
 - definitions, 227(10.8)
 - binding on federal and provincial governments, 227(11)
 - commissions, 153(1)(g)
 - death benefit, 153(1)(d)
 - deferred profit sharing plan payment, 153(1)(h)
 - directors liable for, 227.1
 - dividends received by broker/dealer, 153(4), (5)
 - election for, 153(1)(n), 153(1.1)
 - to increase, 153(1.2), Reg. 109
 - employee outside Canada, exemption, Reg. 104(2)
 - employees, 153(1)(a)
 - employment earnings supplement, 153(1)(s)
 - employment insurance benefit, 153(1)(d.1), Reg. 100(1)“remuneration”(g)
 - exemptions
 - credits on TD1 exceeding tax, Reg. 104(1)
 - employee outside Canada, Reg. 104(2)
 - Home Buyers’ Plan, Reg. 104(3)–(4)
 - Lifelong Learning Plan, Reg. 104.1
 - failure to remit amounts withheld, penalty, 227(9)
 - interest payable, 227(9.2)
 - salary or wages, from, 227(9.5)
 - failure to withhold, 215(6), 227(8)–(10)
 - interest on amounts, 227(8.3)
 - retirement compensation arrangement, 227(8.2)
 - fees and commissions, 153(1)(g)
 - government assistance program, prescribed benefit, 153(1)(m)
 - Home Buyers’ Plan, exemption, Reg. 104(3)–(4)
 - income-averaging annuity contract payment, 153(1)(k)
 - income from employee life and health trust, 153(1)(s)
 - non-resident, 212(1)(w)
 - information return, Reg. 210
 - interest on amounts not deducted or withheld, 227(8.3)
 - interference with remittances, 227(5.2)–(5.4) (1995 draft, abandoned)
 - labour-sponsored funds share disposition, 211.8(2)
 - labour-sponsored funds tax credit, 211.7(2)
 - large employers, must remit through financial institution, 153(1), Reg. 110
 - exception, 153(1.4)
 - liability to pay amount not deducted or withheld, 227(8.4)
 - Lifelong Learning Plan, exemption, Reg. 104.1
 - no action against withholder, 227(1)
 - non-periodic payments, Reg. 103
 - non-residents, *see also* Non-resident tax
 - actors, 212(5.1)–(5.3)
 - employees, 153(1)(a)(ii), 153(6), (7)
 - fees for services, Reg. 105
 - insurers, Reg. 800–805.1
 - interest, dividend and other passive income, 212
 - payments through an agent, 215
 - mutual fund distributions, 218.3
 - not required, where, Reg. 104, 104.1
 - Old Age Security benefits, 180.2(3), (4)
 - partnership, 212(13.1), 227(15)
 - patronage dividends, from, 135(3)
 - payroll, 153(1)(a), Reg. 100–111
 - reductions for certain amounts withheld by employer, Reg. 100(3)
 - penalty, 227(8)
 - pension benefit, 153(1)(b)
 - reduction of, Reg. 809
 - refund of, 227(6), (7)
 - registered disability savings plan, 153(1)(i)
 - registered education savings plan, 153(1)(t), Reg. 103(6)(g), 103(8)
 - registered retirement income fund payment, 153(1)(l), Reg. 103(4), 103(6)(d.1)
 - registered retirement savings plan payment, 153(1)(j)
 - regulations, Reg. Part I
 - remittance deadlines, source deductions, Reg. 108
 - remittances to Receiver General, 153(1), Reg. 108
 - retirement compensation arrangement contribution, 153(1)(p)
 - retirement compensation arrangement distribution, 153(1)(q)
 - retirement compensation arrangement purchase price, 153(1)(r)
 - retiring allowance, 153(1)(c)
 - return required of employee, 227(2)
 - salary, 153(1)(a)
 - severance pay, 153(1)(c)
 - stock option benefits, 153(1.01)
 - superannuation benefit, 153(1)(b)
 - supplementary unemployment plan benefit, 153(1)(e)
 - termination pay, 153(1)(c)
 - trustee etc., liability for, 227(5), (5.1)
 - unclaimed dividends etc., 153(4), (5)
 - undue hardship, 153(1.1)
 - unemployment insurance benefit, 153(1)(d.1), Reg. 100(1)“remuneration”(g)
 - wages, 153(1)(a)
- Within a time, computation of**, *Interpretation Act* 27(5)
- Witness**
- rights of at inquiry, 231.4(5)
- Wood waste**
- defined, Reg. 1104(13)
 - included in eligible waste fuel, Reg. 1104(13)“eligible waste fuel”
- Woodlot**
- intergenerational rollover, 70(9)(a), 70(9.3)(c), 73(3)(c)
 - prescribed forest management plan, Reg. 7400
- Woods assets, capital cost allowance**, Reg. 1100(1)(f), Reg. Sch. IV
- Work camp**, *see* Construction work camp
- Work in progress of professional business**
- deemed to be inventory, 10(5)(a)
 - election to exclude from income until 2017, 34
 - transitional rule 2017–2020, 10(14.1)
 - valuation of, 10(4)(a)
- Work space in home**
- limitation on deductibility
 - from business income, 18(12)
 - from employment income, 8(13)
- Worker Adjustment Programs**, *see* Older Worker Adjustment Program for; Plant Workers Adjustment Program

Workers' compensation payment

- deduction in computing taxable income, 110(1)(f)(ii)
- disclosure of taxpayer information by CRA, 241(4)(n)
- inclusion in income, 56(1)(v)
- information return, Reg. 232

Working Income Tax Benefit, *see* Canada Workers Benefit (former Working Income Tax Benefit)

Working Ventures Fund, *see* Labour-sponsored funds tax credit

Workplace Safety and Insurance Board, *see* Workers' compensation payment

World Anti-Doping Agency

- employment income from, deduction for, 110(1)(f)(iii), Reg. 8900(2)

Writing

- defined, *Interpretation Act* 35(1)

Wrongful dismissal award, *see* Retiring allowance

X, Y, Z**X-rays**

- cost of, as medical expense, 118.2(2)(o)

YMPE, *see* Year's Maximum Pensionable Earnings

Yacht

- expense of, not deductible, 18(1)(l)(i)
- limitation on CCA claim where rented out, Reg. 1100(15)–(20)

Year, *see* Calendar year; Taxation year

Year-end

- deemed
 - charity, on notice of revocation, 188(1)
 - foreign affiliate, 91(1.2)
 - where control of corporation changes, 249(4)
 - where corporation becomes or ceases to be CCPC, 249(3.1)
 - where corporation becomes or ceases to be exempt, 149(10)
 - where corporation becomes or ceases to be financial institution, 142.6(1)
- transactions straddling, to defer income, *see* Straddle transactions

Year's Maximum Pensionable Earnings

- base for SR&ED proxy amount re salaries, Reg. 2900(7)
- current, "CPP Contributions" table, *see* introductory pages
- defined, Reg. 8500(1)

Young child supplement, 122.61(1.2)

Yukon Territory, *see also* Northern Canada

- additional \$0.04 reasonable kilometrage allowance, Reg. 7306(c)
- tax rates, *see* introductory pages

ZEPV, *see* Zero-emission passenger vehicle

ZETM, *see* Zero-emission technology manufacturing

ZETM cost of capital

- defined, Reg. 5202, 5204

ZETM cost of labour

- defined, Reg. 5202, 5204

ZEV, *see* Zero-emission vehicle

Zanatta case overruled, 118.2(2.21)

Zapper software (or hardware)

- use, possession, manufacture or sale of
 - administrative penalty, 163.3
 - criminal offence, 239.1

Zero, minimum amount for formula calculations, 257

Zero-emission passenger vehicle

- capital cost limited to \$55,000, 13(7)(i), Reg. 7307(1.1)
- defined, 248(1)

Zero-emission technology manufacturing

- rate reduction (credit), 125.2, Reg. 5202, 5204

Zero-emission technology manufacturing profits

- credit for, 125.2(2)
- defined, 125.2(1)

Zero-emission vehicle, *see also* Zero-emission passenger vehicle

- capital cost allowance
 - classes, Reg. Sch. II:Cl. 54, 55, 56
 - whether cost limited to \$55,000, 13(7)(i), Reg. 7307(1.1)
 - 100% in year of acquisition, Reg. 1100(1)(a)(xl), (xli), 1100(2)A(e)(i), (f)(i)
- defined, 248(1), Reg. 1102(26)
- off-road vehicle, Reg. Sch. II:Cl. 56

Zone

- economic, *see* Exclusive economic zone
- prescribed, *see* Northern Canada
- tax-free, ITAR 26(3)

Zoos relief (COVID), Reg. 8901.1(2)(b)(v), *see also* Qualifying tourism or hospitality entity

Numbered**10/8 policy**

- defined, 248(1)
- no deduction for interest on money borrowed to acquire, 20(2.01)
- no deduction for premiums paid, 20(1)(e.2)(ii)
- no increase in CDA for death benefit, 89(1)"capital dividend account"(d)(iv)

1942 Conventions

- defined, Canada-U.S. Tax Treaty:Art. III:1(j)

1948 Income Tax Act, The, defined, ITAR 12

1971 receivables, ITAR 23(5)"1971 receivables"

65302 British Columbia Ltd. case overruled, 67.6

1245989 Alberta (Wild) case overruled, 245(1)"tax benefit"(c)