TOPICAL INDEX

Note: References are to sections of the *Excise Tax Act.* VI-VII-3 means ETA Schedule VI, Part VII, section 3. "Memo" numbers **beginning** with 1 to 31 are the Canada Revenue Agency's GST/HST Memoranda, published since 1994 (formerly called "New Memoranda"), originally numbered with dots but changed around 2018 to dashes (e.g., 3.3.1 is now "Memo 3-3-1"). "Memo" numbers **beginning 100 or later** are the CRA's pre-1994 GST Memoranda, some of which are still current (e.g., "Memo 300-6-1"). Policy P-045 means CRA Policy Statement P-045. GI-097 means CRA GST/HST Info Sheet GI-097. These are all reproduced in *GST Memoranda, Bulletins, Policies & Info Sheets* and in the *Canada GST Service* and on *GST Partner* and *Taxnet Pro*, and are also available on the CRA web site. "Not exempt" and "not zero-rated" mean excluded from a stated exemption or zero-rating, but not necessarily taxable — another provision may exempt or zero-rate the supply. References to Analysis are to David Sherman's commentary in *Canada GST Service, GST Partner* and *Taxnet Pro*.

Α

ABM services, see Automated bank machine

ACM, see Alternate collection method for direct sellers

APO, see Accommodation platform operator

ATM (Automated teller machine), see Automated bank machine

Aboriginal government

• defined, re disclosure of taxpayer information, 295(1)

Aboriginal peoples, see Indians and Indian bands

Abuse of statutory provisions

• general anti-avoidance rule, 274(4); TIB B-045

Acceptance, as financial instrument, Memo 17-1 para. 42

Acceptance of coupon for payment, 181(1), see also Coupon

Access to information

• fees paid to government or municipality, exempt, V-VI-20(f)

Accesses

• installation of, exempt, V-VI-21.1(e)

Accessories to agricultural equipment

• whether single supply, Policy P-252

Accessory or part for medical device, zero-rated, VI-II-32; Memo 4-2 para. 61

Accident insurance

- constitutes insurance policy, 123(1)"insurance policy"(b)
- for non-resident individual, zero-rated, VI-IX-2

Accommodation, see also Short-term accommodation

- board and lodging at camp for underprivileged or disabled, exempt, V-VI-13
- · included in institutional health care service, V-II-1
- included in tour package, 163(3)"tour package"
- long-term, exempt, V-I-6; Memo 19-2-2 paras. 1-8
- non-resident, rebate for GST in tour package if paid before 2018, 252.1(2)
- · place of lodging, 123(1)"residential unit"
- remote work site, election by employer, 191(7); Memo 19-2-3 paras. 51–58; Policy P-090
- short-term
- • defined, 123(1)
- rebate to non-residents purchasing tour package before 2018, 252.1(2); Info Sheet GI-032
- • supplied by charity, exempt, V-V.1-1

• • supplied by public institution, V-VI-25

Accommodation platform, *see also* Non-resident e-commerce supplier (e.g., Netflix, AirBNB)

• defined, 211.1(1)

Accommodation platform operator, see also Non-resident ecommerce supplier (e.g., Netflix, AirBNB)

• defined, 211.1(1)

Accommodation supply

• defined, 211.12(1)(d)

Account receivable, see also Debt security

- assignment of on recourse basis, effect of bad debt, Policy P-029R
- purchased at face value from related corporation, bad debt on, 231(2)
- purchaser not liable for tax component, 222.1
- · sale of
- exempt, 123(1)"financial instrument"(a), 123(1)"financial service"(d); Memo 17-1 para. 6
- • purchaser deemed not to collect GST when account collected, 222.1(b)
- • vendor deemed to have collected GST, 222.1(a)
- whether included in all the property on sale of business, Policy P-013
- whether used in course of commercial activities, Policy P-013
- written off, where GST paid up front, 231(1); Policy P-082R

Accountant, see also Professionals and professional services

- misrepresentation by, penalty, 285.1
- representing client, CRA can disclose information to, 295(6)(b)

Accounting methods

- apportionment of input tax credits, 141.01(5); Memo 8-1 paras. 33–49
- • financial institutions, 141.02
- simplified, see Simplified: accounting

Accounting periods, see Fiscal month; Fiscal quarter

Accounts receivable, see Account receivable

Acquiescence in offence, by officer, director or agent of corporation or association, 330

Acquisition, see also Business

- of business
- • by financial institution, change-in-use rules, 205(4)–(5)
- • from financial institution, 149(3); Policy P-021
- • no tax, 167(1), (1.1); Memo 14-4

Acquisition (cont'd)

- of commercial activity, things done deemed in course of commercial activity, 141.1(3)
- of farmland in joint tenancy, Policy P-183
- of property or service for purpose of making taxable supplies, 141.01(2); Memo 8-3 paras. 17–27

Action

- defined, 313(1)
- recovery of tax by Crown, for, 313(2.1)

Active member

- defined
- • for pension plan expenses, 172.1(1)
- • for pension plan rebate, 261.01(1); TIB B-XX4

Activity

- meaning of, for definition of business, Policy P-167R
- prescribed, for joint venture election, 273(1); *Joint Venture* (GST/HST) Regulations; TIB B-021

Actual amount

 defined, for information return for financial institutions, 273.2(1)

Actuary

 professional services excluded from financial service, 123(1)"financial service"(r)

Acupuncture services

- exemption for, V-II-7(l)
- practitioner of, V-II-1"practitioner"

Added property

• defined, for export distribution centres, 273.1(1)

Addiction counselling, see Counselling

Addition to multiple unit residential complex

- builder of, 123(1)"builder"
- deemed not capital property, 195.1(2); Memo 19-2-3 para. 103
- deemed separate supply from rest of complex, 136(3)
- self-supply rule, 191(4), (5)
- substantial completion of, defined, 191(9)
- supply of, exempt when tax already paid, V-I-3, 5; Memo 19-2-1 paras. 32–39

Addition to single unit residential complex

 whether constitutes new complex, Memo 19-3-7 paras. 4–9; Policy P-153 (obsolete)

Addresses, see also Mailing address

- CRA offices, see canada.ca/cra-offices
- CRA rulings centres, Memo 1-4
- CRA tax services offices, "Government Directory" tab (Binder C1)
- of customers, used to determine place of supply of services, New Harmonized Value-added Tax System Regulations s. 13(1)
- used to determine residence for non-resident e-commerce, 211.11(1)(a)-(d)

Adjusted cost base, 123(1)"improvement", 192(a)

Adjusted tax credit amount

• defined, for ITC allocation of financial institutions, 141.02(1)

Adjusted total tax amount

• defined, for ITC allocation of financial institutions, 141.02(1)

Adjuster (insurance), 123(1)"financial service"(j)

- damage appraisal for, 123(1)"financial service"(j.1); Policy P-049; Info Sheet GI-134
- organization providing services of, licensing, Policy P-056R2

Adjustment of GST return, Policy P-149R

Adjustment of tax

- by supplier, 232(2)–(4); Memo 12-2; TIB B-042; Policy P-030R
- prepaid supplies (1989-90), transitional rules, 340.1
- prepaid supplies (Oct 24/96–Jan/97), HST transitional rules, 355; TIB B-077
- request resulting from application of general anti-avoidance rule, 274(6)

Adjustment service

- tangible personal property, place of supply for HST
- after April 2010, New Harmonized Value-added Tax System Regulations s. 29

Administration and enforcement, 275-335

- · appeals, see Appeal
- assessment, see Assessment
- audit, see Audit by Canada Revenue Agency
- collection of tax, see Collection of tax
- criminal offences, see Offences
- duties of Minister, 275
- election forms, see Election (that can be made)
- evidence and procedure, 333-335
- garnishment, 317, *see also* Garnishment (of amounts payable to tax debtor)
- inquiry, by hearing officer, 276
- interest on late payment, see Interest
- · keeping books and records, see Books and records
- officers, see Revenue Canada
- penalties, see Offences; Penalties
 - · returns, see Return
 - search and seizure, 290

Administrative costs

 of holding company, whether input tax credit available, Policy P-196R

Administrative service, *see also* Management or administrative service

- Administrative Services Only (insurance) agreement, Policy P-136R
- deemed not financial service, Financial Services and Financial Institutions (GST/HST) Regulations s. 4(2)(b)
- excluded from financial services, 123(1)"financial service"(q)
- rebate of provincial portion of HST, financial institution, 261.31(2); New Harmonized Value-added Tax System Regulations, No. 2, s. 21.1

Administrator

- barter exchange network, defined, 181.3(1)
- estate, see Executor of estate; Personal representative of deceased individual

Admission, see also Place of amusement

- amateur performance, to, V-VI-11
- convention, to
- • foreign convention, non-taxable, 189.2(a)

Admission (cont'd)

- • non-resident delegate, non-taxable, 167.2(1)
- • percentage of non-residents expected, Policy P-095
- defined, 123(1)"admission"
- made by public sector body, V-VI-5, 8, 9, 11
- · non-resident making
- • required to file return, 238(3); Policy P-134R
- • required to register, 240(2)
- supplied by charity or public institution, V-V.1-1(e), V-V.1-1(g)(i), V-V.1-6, V-VI-2(i), (m), V-VI-3, 5, 9
- whether supply made in Canada, 143(1)(c)

Advance rulings, Memo 1-4

Adventure in the nature of trade

- election for tax on supply of real property, V-I-9(2)(b)(ii)
- • revocation not permitted, Policy P-073
- included in commercial activity, 123(1)"commercial activity"(b)
- meaning of, Memo 19-5 Appendix C; Policy P-059
- required in definition of builder, 123(1)"builder"

Adverse possession

• transfer of real property to resolve, Policy P-178

Advertising

- cooperative advertising payment, Memo 300-7 para. 39; Memo 300-7-7
- excluded from rule re sponsorship of public service activities,
 135
- expenses incurred by employee, rebate for, 253; Memo 500-4-
- featuring performers or competitors who are remunerated, effect on exemption for amateur events, V-VI-11
- meaning of, Memo 4-5-3 paras. 49-50
- on Web sites, TIB B-090
- service supplied to unregistered non-resident, zero-rated, VI-V-8; Memo 4-5-3 paras. 48-50

Advisory Group

• defined (re Northumberland Strait Crossing), 362(1)

Advisory service

- meaning of, Memo 4-5-3 paras. 8, 10; Policy P-173
- · provided to non-resident
- • made outside Canada, 142(2)(g)
- zero-rated, VI-V-9, VI-V-23; Memo 4-5-3 paras. 51–54, 87–90
- ••• establishing business venture in Canada, VI-V-9; Memo 4-5-3 paras. 51–54; Policy P-173

Aerosol chamber

• zero-rated as medical device, VI-II-5.1; Memo 4-2 paras. 8, 9

Affiliated

 defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 52(2)

Affiliated group

 defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 52(1)

Agency, see also Agent

- arrangement for medical or dental practice, Policy P-238
- defined, 123(1)

Agent, see also Bare trust

- bringing goods into province for another person, 220.02; TIB B-081, B-XX5
- election for remittance of tax for principal, 177(1.1)
- essential qualities of, Policy P-182R; Info Sheet GI-012
- expenses incurred as, not included in GST base, former 178
- independent, does not create permanent establishment, 123(1)"permanent establishment"
- · indicators of agency, Policy P-182R; Info Sheet GI-012
- insurance, Memo 17-9
- meaning of, Memo 4-5-3 para. 38; Policy P-016, P-105R, P-182R; Info Sheet GI-012
- of Her Majesty, prescribed agent, 123(1)"specified Crown agent"; Specified Crown Agents (GST/HST) Regulations
- sale of property not used in commercial activity, 200(4), 209(1)
- purchasing, see Purchasing representative
- · sales, see also Sales representative
- • services to non-residents, zero-rated, VI-V-5; Memo 4-5-3 paras. 23, 37–38, 90, 92
- • whether deemed sale by principal, 177(1); Memo 3-1 paras. 82–90; Info Sheet GI-009
- supply on behalf of principal, 177(1); Memo 3-1 paras. 82–90; Info Sheet GI-009
- sweetening, zero-rated, VI-III-1; Memo 4-3 para. 1

Agreement, see also Contract; Joint venture

- breach of, when amount forfeited, 182
- collective, dues required by, 189
- documentation of GST required, 223(1)–(1.2); Disclosure of Tax (GST/HST) Regulations; Memo 8-4; TIB B-013
- entering into, constitutes supply, 133
- franchise, see Franchise
- in writing
- • meaning of, GST 300-6-4 paras. 5-7
- when consideration due, 152(1)(c), 152(2); GST 300-6-4
- included in definition of record, 123(1)"record"
- · joint venture, 273
- purchase and sale, for new home, *see* Assignment: purchase and sale agreement
- rent to own, Policy P-164
- silent on whether GST included or extra, Policy P-116
- transfer under, constitutes sale, 123(1)"sale"
- when consideration due under, 152(1)(c), 152(2)

Agriculture and fishing, zero-rated, VI-IV; Memo 4-4

- animals, VI-IV-1
- barley, VI-IV-3
- bees, VI-IV-1
- crops, VI-IV-2
- drugs supplied for, not zero-rated, VI-I-2; Memo 4-1 para. 5
- eggs, VI-IV-4
- farm equipment, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1); Policy P-252
- farming, whether reasonable expectation of profit, Policy P-176R
- feed, VI-IV-2; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(2), (3)
- feedlot services, 164.1, VI-IV-2.1
- fertilizer, VI-IV-5

Agriculture and fishing, zero-rated (cont'd)

- fish, VI-IV-8; Info Sheet GI-049
- fishing equipment, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:2; Info Sheet GI-049
- flax seed, VI-IV-3
- fodder, VI-IV-2; Info Sheet GI-107
- grains, VI-IV-2; Info Sheet GI-107
- hay, VI-IV-2; Info Sheet GI-107
- hops, VI-IV-3
- joint venture election, farming, 273(1)
- livestock, VI-IV-1
- pesticide, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(4)
- poultry, VI-IV-1
- prescribed property, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations; Finance news release 93-039; Info Sheet GI-049
- quota, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(5)
- rabbits, VI-IV-1.1
- seeds, VI-IV-2; Info Sheet GI-107
- sharecropping, VI-IV-9; Policy P-253
- silage, VI-IV-2; Info Sheet GI-107
- straw, VI-IV-3
- sugar beets, VI-IV-3
- sugar cane, VI-IV-3
- tobacco leaves, VI-IV-7
- wool, VI-IV-6

Aids to locomotion

zero-rated as medical device, VI-II-14; Memo 4-2 para. 22

Air ambulance service

• zero-rated, VI-VII-15

Air conditioner

• for automobile, excise tax on, I-7, I-8; Memo 800-1

Air navigation services

- international flights, zero-rated, VI-V-2.2; Memo 4-5-3 paras. 32-33
- place of supply for HST
- after April 2010, New Harmonized Value-added Tax System Regulations s. 33

Air rights, sale of, Memo 19-5 para. 69

Air traffic control, see Air navigation services

Air Transportation Tax, 8-21; TIB B-008

- eliminated effective November 1998, 16.1
- rates of, historical listing, Memo 800-4

Air transportation security charge

• imposition of, Air Transportation Security Charge Act

Air travel, see Aircraft; Passenger transportation service

Air Travellers Security Charge Act

 compliance with required before refunds etc. paid, 229(2), 230(2), 238.1(2)(c)(iii), 263.02, 296(7)

AirBNB tax, see Non-resident e-commerce supplier (e.g., Netflix, AirBNB)

Aircraft, *see also* Capital property; Carrier; Conveyance; Passenger transportation service

- ambulance service provided by, zero-rated, VI-VII-15
- fuel supplied to international carrier, VI-V-2, 2.1; Memo 4-5-2 paras. 21–25; Policy P-006, P-076
- in-flight supplies
- • whether HST applies, New Harmonized Value-added Tax System Regulations s. 23; TIB B-103; Memo 28-3
- • whether GST applies, international flight, 180.1; Memo 28-3 paras. 25–28
- input tax credits, Memo 8-2 paras. 22-41
- · of individual or partnership, non-registrant
- • rebate for based on capital cost allowance, 253(1)
- · of individual or partnership, registrant
- • ceasing to use exclusively in commercial activity, 203(3)
- excluded from normal capital property rules, 199(1)(a), 200(1)(a)
- input tax credit based on capital cost allowance, where not used exclusively in commercial activity, 202(4), (5); Memo 8-2 paras. 35–41
- input tax credit where used exclusively in commercial activity, 202(2), (3)
- sale of, 203(3)
- supply to unregistered carrier for use in, zero-rated, VI-V-2; Memo 4-5-3 paras. 27–30; Policy P-006, P-076

Aircraft fue

• defined, for B.C. point-of-sale rebate, *Deduction for Provincial Rebate (GST/HST) Regulations* s. 1

Airport screening services

• place of supply for HST, New Harmonized Value-added Tax System Regulations s. 33.2

Alberta

- new home purchase agreements in, Memo 19-3-7 para. 1; Policy P-083
- provincial government entities that pay no GST, 122 (Analysis); Memo 18-2 paras. 26–28

Alcoholic beverages, Info Sheet GI-036

- excise tax on wines, 27; Memo 800-1
- excluded from exemption for certain public sector body sales, V-VI-4
- FST inventory rebate for, TIB B-004, B-040; GST 900 para. 5(a)(iv)(D)
- importation by mail, taxable, *Mail and Courier Imports* (GST/HST) Regulations s. 3(a); Courier Imports Remission Order s. 2"goods"(a); Postal Imports Remission Order s. 2"goods"(a)
- licence to import, taxable, 146(d), V-VI-20(c)
- not eligible for non-resident business rebate for goods exported, 252(1)(a)
- not eligible for public service body rebate, rules, *Public*Service Body Rebate (GST/HST) Regulations s. 4(1)(e); TIB B-025
- spirits, 123(1)"excisable goods"
- taxable, VI-III-1(a); Memo 4-3 paras. 9-16; Policy P-081R
- zero-rated when exported in bond, VI-V-3; Memo 4-5-2 paras.

Algebraic formula

• treatment of negative amounts, 125

All or substantially all, see also Exclusive

- "all" deemed to include "substantially all", 141(1)-(4)
- application to residential complex with some short-term rentals, Policy P-053
- interpreted by CRA to mean 90% or more, 123(1)"exclusive" (Analysis), Policy P-023, P-053

Allocation

- consideration among supplies made together, 153(2), 167(1)(a)
- financial institution's net tax, HST and non-HST provinces, 225.2(2), (3); TIB B-083R
- fund raising event, ticket price, 164
- input tax credits, 141.01(5); Memo 700-5-1; Memo 8-3 paras. 33-49; Memo 19-1 paras. 99-103
- • financial institutions, 141.02
- payments to lease intervals, see Lease (or license): interval
- public service body rebate, 259(4.1), (7), (8)

Allowance

- automobile, reasonable, effect on rebate for expenses, Policy P-113R
- for food and entertainment, 236(1); Memo 8-2 paras. 50-67
- land, for residential complex, Policy P-069
- meaning of, Policy P-075R
- promotional, treated as adjustment to consideration, 232.1
- to employee or partner, for travel or other expenses, 174;
 Memo 9-4
- to municipal officer, Policy P-097R2
- to volunteer, paid by charity, 174(a)(iii); Memo 9-4

Alpacas, zero-rated, VI-IV-1; Memo 4-4 para. 5

Alteration, see also Construction

- building, of
- • non-substantial renovation, 192; Memo 19-2-3 paras. 68-76
- substantial renovation, 123(1)"builder", 123(1)"substantial renovation", 191; Policy P-155
- · real property or ship, of
- • holdback not taxed, 168(7)
- • tax payable when substantially completed, 168(3)(c)
- · tangible personal property
- • place of supply for HST
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 29

Alternate collection method for direct sellers, 178.1–178.5; Memo 14-1; Info Sheets GI-125, GI-126

Alternative basis for assessment

• Minister allowed to raise, 298(6.1)–(6.3)

Amalgamation

- general rules, 271; Amalgamations and Windings-Up Continuation (GST/HST) Regulations; TIB B-007
- involving a financial institution, 149(2), 205(6)
- • subsequent ITC allocation method, 141.02(4)

Amateur athletic association

- · constitutes charity, 123(1)"charity"
- non-profit organization even where income payable to members, 123(1)"non-profit organization"

Amateur performance or event exempt, V-VI-11

Ambassadors, see Diplomats

Amber, articles made of

• excise tax on, I-5(b); Memo 800-1

Ambiguity in legislation

• correction by regulation may be retroactive, 277(2)(b)

Ambulance services

- air ambulance, zero rated, VI-VII-15
- exempt, V-II-4

Amendment of GST return, Policy P-149R

Amendments to legislation, see Legislative amendments

Amenity

• meaning of, for non-resident tour package rebate, Memo 27-3 paras. 5-6

American government, see United States

Ammonite gemstone

• included in definition of mineral, 123(1)"mineral"

Amount, *see also* Consideration; Dollar amounts in legislation and regulations; Quantities

• defined, 123(1)

Amusement, see Place of amusement

Amway representative, see Direct seller

Andrews case overruled, VI-VII-1(1)"freight transportation service"(a.1)

Animal

- hides, taxable, Memo 4-4 para. 2
- mounts, Info Sheet GI-047
- ownership, joint venture election, *Joint Venture (GST/HST)* Regulations s. 3(1)(j)
- sale of, zero-rating, see Agriculture and fishing, zero-rated

Ankle, crippled or deformed, appliance made to order, zerorated, VI-II-24; Memo 4-2 para. 40

Announcement date

• defined, 348

Annual filing, see Fiscal year

Anti-avoidance rules, see also Input tax credit; Offences; Penalties

- British Columbia dropping HST, British Columbia HST Regulations ss. 11–12
- builder leasing or occupying new home (self-supply rule), 191
- clearing and settlement services, use of s. 150 election, 150(2)(c)
- consideration must be allocated reasonably, 153(2)
- federal sales tax, pre-1991, 68.2(2)
- general (GAAR), 274; TIB B-045
- grandfathered lease agreement, variation of, 340(7)
- HST, New Harmonized Value-added Tax System Regulations ss. 34–37
- municipal rebate in Newfoundland and Labrador, *New Harmonized Value-added Tax System Regulations* s. 58.47
- new housing rebate (FST), 121.1
- non-arm's length supplies, 155
- non-arm's length transfer of property or money, 325
- · restrictions on input tax credits
- benefits provided to shareholders and employees, 170(1), 173
- • real property, after exempt sale of, 225(5)

Anti-avoidance rules (cont'd)

- specified tangible personal property, 176(5) [repealed]; TIB B-084
- • unreasonable consideration, 170(2)
- • works of art, 176(5) [repealed]; TIB B-084
- spouse, transfer of property or money to, 325

Anti-embolic stockings, zero-rated, VI-II-35; Memo 4-2 para. 51

Apartment

- building, see Multiple unit residential complex
- · constitutes residential unit, 123(1)"residential unit"
- rentals exempt, V-I-6; Memo 19-2-2 paras. 1-8

Appeal, see also Assessment; Objection (to assessment)

- of assessment to Tax Court, 302, 306-309
- • extension of time to file, 305
- • requirement to keep books and records while pending, 286(4)
- • security for payment while pending, 314(2)
- of order or direction re communication of information, 295(7)
- proof that not instituted, 335(6)
- re imported goods (Division III)
- • determination of tax status, to Tax Court, 216(4)
- • issues other than determination of tax status, 216(3)
- restrictions on, where insufficient detail on notice of objection, 301(1.4), 306.1(1)
- settlement of, 298(3)(b)
- stay of, pending outcome of prosecution, 327(4)

Appliance

- · kitchen
- • not considered part of mobile home, 123(1)"mobile home"
- whether included in consideration for new housing rebate, Policy P-052
- · medical, zero-rated
- article or material necessary for, VI-II-26; Memo 4-2 para.
- • for foot or ankle, VI-II-24; Memo 4-2 para. 40
- ileostomy, colostomy or urinary, VI-II-25; Memo 4-2 para.
 43
- orthodontic, zero-rated, VI-II-11.1; Memo 4-2 para. 19

Applicable legislated amount

• defined, for returnable containers, 226(1)

Application (made to CRA)

- barter exchange network, 181.3(2)
- buyer designation (for buying group), 178.6(2)
- direct seller, alternate collection method, 178.2; Memo 14-1 paras. 13-16
- evidence as to when made, 335(4)
- evidence as to whether made, 335(3), (13)
- export certificate, authorization to use, 221.1(2)–(3)
- extension of time for notice of objection, 303
- FST inventory rebate, 120(3)(a)
- FST new housing rebate, 121(4)
- · false statement in
- • fine or imprisonment, 327(1)(a)
- • penalty, 285
- import certificate, 213.2(2), 213.2(4)

- late filing of streamlined accounting election, 227(2)(c); Policy P-100R
- not binding on CRA, 299(1)
- public service body, separate branches for small supplier rules, 129
- rebates, 215.1(2)(d), 252–262, see also Rebate (of tax)
- registration, 240(2.1), 240(5)
- separate rebate applications for branches, 261(6)
- separate returns and rebate applications for branches, 239(1), 261(6); Memo 2-4
- unincorporated organizations, to be deemed one person, 130

Application dates

- GST legislation, S.C. 1990, c. 45, s. 12 (reproduced before s. 122)
- retroactive legislation, S.C. 1993, c. 27, s. 210 (reproduced before s. 122)

Application fees

• for licence, permit, quota, etc., exempt, V-VI-20(c)

Application for registration, see Registration (for GST/HST)

Application hosting

• characterization as service or intangible property, TIB B-090

Apportionment, see Allocation

Appraisal services

- damage, under insurance claims, exempt, 123(1)"financial service"(j.1); Policy P-049; Info Sheet GI-134
- generally, taxable, 165(1)

Apprentice mechanics' tools

• employee rebate, 253

Appropriate reporting period

 defined, for recapture of ITC on luxury car lease payments, 235(2)

Appropriation of property, see also Self-supply rules

- as capital property, 196.1
- by direct seller or distributor, for independent sales contractor, 178.5(8); Memo 14-1 paras. 31(e), 34, 35, 43(e), 46, 47, 57, 60(b)
- by network seller, 178(19)
- for benefit of shareholder, partner, beneficiary or member, tax on. 172(2)
- for particular use, 196
- of multiple unit residential complex, 191(3)
- of real property by individual, 190(2); Memo 19-2-3 paras. 85–86
- of residential condominium unit, 191(1), (2)
- of single unit residential complex, 191(1)

Approval sale, see also Consignment sale

• direct seller, alternate collection method, 178.2; Memo 14-1; Info Sheet GI-125

Appurtenances

• to a building, 123(1)"residential complex"

Arbitration Plan (Ontario)

• buy-back of vehicle, effect of, Policy P-036

Arcade game, see Coin-operated device

Architect, see Professionals and professional services

Arm, artificial, zero-rated, VI-II-22; Memo 4-2 para. 38

- Canadian, abroad, deemed resident in Canada, 132(1)(d)
- foreign, in Canada, see Visiting forces

Arm's length, see also Non-arm's length

- defined, 126(1)
- restricted meaning for provincial real property transitional rules, New Harmonized Value-added Tax System Regulations, No. 2, ss. 48(2), 58.01
- special rule for members of Lloyd's association, 217.1(9)(i),
 (j), 217.1(11)(c)
- permanent establishments of a person deemed at, 132(4), 220(b) [History]
- · segregated fund and insurer deemed not at, 131

Arms and military stores

- no GST on importation, VII-1
- no HST on bringing into participating province, X-I-1, 4

Arrangements of prepared food

- meaning of, Policy P-232
- taxable, VI-III-1(o.3); Memo 4-3 paras. 114-118

Arranging for

- financial service, exemption, 123(1)"financial service"(l)
- meaning of, Policy P-239
- release of goods by Customs, place of supply of service for HST purposes
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 25

Art, see Artist; Specified tangible personal property

Art gallery, see also Place of amusement

- election to claim input tax credits on works of art, 176(6) [repealed]; Memo 400-3-6; TIB B-084
- exhibit, no tax on importation, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(c)

Artificial breathing apparatus, zero-rated, VI-II-5; Memo 4-2

Artificial eye, zero-rated, VI-II-10; Memo 4-2 para. 17

Artificial insemination

- services taxable, Memo 4-4 para. 3
- sperm zero-rated, VI-I-5

Artificial limb, zero-rated, VI-II-22; Memo 4-2 para. 38

Artificial sweeteners, whether zero-rated, VI-III-1, 1(e); Memo 4-3 paras. 46–47

Artificial teeth, zero-rated, VI-II-11; Memo 4-2 para. 18

Artist, see also Admission; Performing artist

- · classes or activities involving arts, exemption for, V-VI-12
- music lessons, exempt, V-III-9; Memo 20-6
- · performance by
- • admission to, 123(1)"place of amusement"
- excluded from exemption for supplies by charities, V-V.1-1(h), V-VI-2(i)
- • whether exempt, V-VI-11
- reasonable expectation of profit, Policy P-176R
- supply by artists' representatives, 177(2); Artists' Representatives (GST/HST) Regulations; TIB B-009
- work produced for export, rebate to non-resident, 252(2); Policy P-195R

Assessment, 296–300

- alternative basis for, permitted, 298(6.1)–(6.3)
- appeal from, see Appeal
- assignee of provincial new housing rebate, 256.21(10)
- date, deemed to be day of mailing, 335(11)
- deemed valid unless reassessed, 299(3), (4)
- defined, 123(1)
- derivative, 325
- directors' liability for failure to remit, 323(4)
- garnishment, on, 317(9), (10)
- general anti-avoidance rule, under, 274(6)–(8); TIB B-045
- harmonized sales tax, self-supply rules, 296(1)(b), 298(1)(a.1)
- interest, see Interest
- limitation period (normally four years), 298(1), (4)
- • on consent, 298(3)(b)
- • waiver, 298(7), (8)
- Minister not bound by information provided, 299(1)
- non-arm's length transferee or property, of, 325(2)
- not a precondition to liability for tax, 299(2)
- notice of, 300
- objection to, see Objection (to assessment)
- overpayment of rebate, 298(1)(a)(ii), (iii)
- overpayments, application of, 296(3), (3.1)
- provision for, 296, 297
- purchaser, where insolvent, Policy P-112R
- reassessment
- • constitutes assessment, 123(1)"assessment"
- • of rebate, 297(2)
- • of tax, 296(2)
- rebate, of, 297
- recipient, where insolvent, Policy P-112R
- refund, see Refund
- required before collection, 315(1)
- tax, of, 296
- tax-extra or tax-included, Policy P-118R
- time limit, 298
- • waiver, 298(7), (8)
- trustee in bankruptcy, of, 298(1)(g)
- · unincorporated bodies
- • binding effect of assessment, 299(3.1)
- • officers and members of, 324

Assessment of property

• information or certificate exempt, V-VI-20(e)(iii)

Asset management service

- defined, 123(1); TIB B-105
- excluded from exempt financial services, 123(1)"financial service"(q.1)

Assets, sale of

• no tax on transfer of a business, 167(1), (1.1); Memo 14-4

Assignment

- bankruptcy, in, 265
- corporation, by, directors liable for unremitted tax, 323(2)(c)
- GST registration number, of, 241(1)
- joint venture election, on, assignee deemed to have made election, 273(2)

Assignment (cont'd)

- lease, constitutes sale of real property, 123(1)"real property";
 Memo 19-4-1 paras. 11–12
- purchase and sale agreement, for new home or condo, 192.1, Notice 323
- • in PEI, Info Sheets GI-144, GI-152
- rebate
- new housing (FST), to builder, 121(6) (Analysis); TIB B-010
- new housing (GST) to builder, 234(1), 254(4), 254.1(4); Memo 19-3-1-1, 19-3-1-2
- new housing (Ontario HST) to builder, New Harmonized Value-added Tax System Regulations, No. 2, s. 41(6); Info Sheets GI-085, GI-086, GI-130
- • new housing (PEI HST) to builder, Info Sheets GI-147, GI-148
- • new housing (provincial portion of HST), to builder, 256.21(6)–(10)
- • non-resident
- • drop-shipped goods, 252(3), 252.5
- • goods produced for export, 252(3), 252.5
- representative must obtain certificate before distributing assets, 270
- security interest, of, Policy P-122
- tax collected not part of estate on, 222(3)

Assistive devices, zero-rated, VI-II

Associate, see Associated persons

Associated corporations, see Associated persons

Associated persons

- branches of public service body, when deemed not to be, 129(2)
- defined, 127
- taxable supplies pooled among
- • filing frequency, 249
- • reporting periods, 249
- • small business transitional credit, 346(2); Memo 200-9
- • small supplier status, 148

Association, *see also* Amateur athletic association; Club; Membership; Unincorporated organization

- application to be deemed a branch, 130; Memo 2-4 paras. 21–24
- officers and members, obligations of, 324
- professional or trade, exemption for courses given by, V-III-6; Memo 20-4
- · public servants, of
- • exemption for membership dues, 189
- • exemption for supplies by, V-VI-26
- · residence of
- • deemed in a province, 132.1(1)(b)
- • deemed in Canada, 132(1)(b)
- service of notice on, how done, 333(1)(c)
- when a person, 123(1)"person"; Memo 2-1 paras. 14(g), 15; Memo 2-4 para. 20
- who constitutes an officer of, 123(1)"officer"
- who may execute documents, 279(a)

Asthmatics

 aerosol chambers and metered dose inhalers, zero-rated as medical device, VI-II-5.1; Memo 4-2 paras. 8, 9

Athabasca University case overturned, 259.1(2)(a)(ii), (b)(ii)

Athletics, see also Amateur athletic association

- activity, participation in, excluded from exemption for charities, V-V.1-1(g)(ii), V-VI-2(h)
- classes or activities involving, exemption for, V-VI-12
- · club, see Club
- contest, 123(1)"place of amusement"
- instruction in, excluded from exemption for charities, V-V.1-1(f), V-VI-2(j)
- spectators, exemption, V-VI-11

Attornment of rents

- not a seizure, Policy P-102 example 2
- remittance of tax by creditor, Policy P-131R

Attribution method, see Special attribution method

Attribution point

- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 16(1), 47(1)(b)
- election for, for an investment plan, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 18

Auction

- "auctioneer" defined, 177(1.2)
- GST treatment of sale at, 177(1.2); Memo 3-1 paras. 87–89; Info Sheet GI-010
- exception for wholesale auctions, 177(1.3); Info Sheet GI-010
- on-line, TIB B-090
- sale of goods seized from tax debtor, 321(2)

Auctioneer, Info Sheet GI-010, see also Auction

Audio-cassette supplied with publication

 treated as publication on importation, 143.1; Publications Supplied by a Non-resident Registrant (GST/HST) Regulations s. 3(b)

Audio linkup, see Telecommunication service

Audio recordings of books

 rebate on purchase by public service body, 259.1(2)(b); Memo 13-4

Audiological services

- exemption for, V-II-7(g)
- practitioner of, V-II-1"practitioner"

Audit by Canada Revenue Agency, Memo 500-3-1, see also Verification

- Agency policies, Memo 500-3-1
- authorization for, 288(1)
- books and records outside Canada, Policy P-055R (obsolete); Memo 15-1 para. 18
- compliance order, 289.1
- computerized records, Memo 15-2
- electronically filed returns, Memo 7-5 para. 10
- to net tax, 296(2), (2.1)

Author

• reasonable expectation of profit, Policy P-176R

Author (cont'd)

- sale of publishing rights outside Canada, Policy P-200R
- supply by artists' representatives, 177(2); Artists' Representatives (GST/HST) Regulations; TIB B-009

Authorized foreign bank, see also Foreign bank branch

- defined, 167.11(1)
- included in definition of bank, 123(1)"bank"
- restriction on accepting GST remittances, 278(3)(a)

Authorized individual

· defined, for prescription of drugs, VI-I-1

Authorized person, *see also* Communication of information (by CRA)

- · defined
- • for confidentiality of information, 295(1)
- • for inspections and seizures, 287
- permission to communicate information, 295(5)
- prohibition against communicating information, 295(2), (3)

Authorizing credit

excluded from exempt financial services, 123(1)"financial service"(r.3)(i)

Autism

• training to cope with, V-II-14, 15; Info Sheet GI-113

Automated bank machine

• services related to, whether taxable, Info Sheet GI-006

Automobile, see also Motor vehicle; Specified motor vehicle

- air conditioner for, excise tax on, I-7; Memo 800-1
- allowance paid to employee or partner, 174(a)(ii); Memo 9-3; Policy P-076
- apprentice mechanics' tools, employee rebate, 253
- · association, free tourist literature
- • no GST on importation, VII-3(b)
- • no HST on bringing into participating province, X-I-12(b)
- auction of, special rule, 177(1.3)
- benefit to employees, 173; Memo 9-2, see also Employee(s)
- buy-back under Ontario Arbitration Plan, Policy P-036
- defined, 123(1)"passenger vehicle"
- disabled person, modifications for, 258.1; Info Sheet GI-199
- • lease of vehicle, reduced tax, 258.1(7); Info Sheet GI-199
- modification service zero-rated, VI-II-18.1; Memo 4-2 paras.
 27, 28; Info Sheet GI-199
- • rebate on importation of vehicle, 258.1(6), 258.2; Info Sheet GI-199
- rebate on purchase of vehicle, 258.1(2)–(5); Info Sheet GI-199
- excise tax on, I-6; Memo 800-1
- expenses, rebate for employees and partners, 253; Memo 500-4-6
- • where reasonable allowance received, Policy P-113R
- HST on, see Specified motor vehicle
- input tax credit, Memo 8-2 paras. 22-41
- expenses, based on capital cost allowance, 202(4); Memo 8-2 paras. 35–41
- • improvement, dollar cap, 202(1)
- • leasing cost, cap, 235(1); Memo 8-2 paras. 42–49
- • not exclusively used in commercial activity, 202(4); Memo 8-2 paras. 35–41

- •• purchase cost, dollar cap, 201, 202(1); Memo 8-2 paras.
- • used exclusively in commercial activity, 202(2)
- leased
- • by selected listed financial institution, 235(1)B(a)
- • election not to claim input tax credit, 173(2)–(4); Memo 9-2 paras. 45–53
- • input tax credit to lessor for insurance repairs, Policy P-
- • monthly payment over dollar cap, 235; Memo 8-2 paras. 42–49
- luxury, limitations on input tax credit, 201, 235; Memo 8-2 paras. 23–30, 42–49
- · of individual or partnership, non-registrant
- rebate for, based on capital cost allowance, 253(1); Memo 500-4-6; Policy P-113R
- of individual or partnership, registrant
- • ceasing to use exclusively in commercial activity, 203(3)
- • excluded from normal capital property rules, 199(1)(a), 200(1)(a)
- •• input tax credit based on capital cost allowance, where not used exclusively in commercial activity, 202(4), (5); Memo 8-2 paras. 35–41
- • input tax credit where used exclusively in commercial activity, 202(2), (3)
- • sale of, 203(3)
- operating expenses, calculation of benefit, 173(1)(d)(vi);
 Automobile Operating Cost Benefit (GST/HST) Regulations;
 Memo 9-2 paras. 30–35, 56–57, Appendix B
- passenger vehicle defined, 123(1)
- registered in a province, place of supply deemed to be in that province, New Harmonized Value-added Tax System Regulations s. 33.1; Info Sheet GI-119
- rental, see Lease (or license): automobile
- rented, temporary importation of by Canadian resident, calculation of tax, *Value of Imported Goods (GST/HST) Regulations* s. 15:A(a)(iii)
- sale of, 200(3), 203(1), (3); Memo 8-2 para. 32
- • by municipality or designated municipality, 203(4)
- taxable benefit from, 173
- trade-in
- • reduces consideration on new sale, 153(4), (5); TIB B-084
- · use in commercial activities
- • decrease in, 200(2), 203(2)
- • increase in, 199(3), 202(4)
- used, see Used goods and used tangible personal property

Auxiliary driving control for disabled individual

- lease of vehicle, reduced tax, 258.1(7); Info Sheet GI-199
- rebate on importation of vehicle, 258.1(6), 258.2; Info Sheet GL-199
- rebate on purchase of vehicle, 258.1(2)-(5); Info Sheet GI-199
- zero-rated, VI-II-18; Memo 4-2 para. 26

Available, see Made available in/outside Canada

Aviation fuel, see Fuel

Avoidance of tax, see Anti-avoidance rules

Avon representative, see Direct seller

Awards

· cash prizes, effect on exemption for spectator fees, V-VI-11

Awards (cont'd)

- medals and trophies
- • awarded outside Canada or participating provinces
- • no GST on importation, VII-2
- • no HST on bringing into participating province, X-I-11
- • imported for award in Canada, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(k)
- of costs by court, see Costs (legal)
- of prizes, 123(1)"game of chance"

В

BST (Blended Sales Tax), see Harmonized Sales Tax

Baby food, zero-rated, VI-III-1(n); Memo 4-3 para. 27

Babysitting, see Child care

Bacon

- crisps, taxable, VI-III-1(f); Memo 4-3 para. 55
- flavoured crackers, taxable, VI-III-1(m); Memo 4-3 para. 94

Rad debts

- assignment of accounts receivable, Policy P-029R
- deduction from net tax for, 231(1), (2); Policy P-066 (obsolete)
- exclusion of provincial sales tax from calculation, Policy P-066 (obsolete)
- FST refund for, TIB B-034
- forgiven under Companies' Creditors Arrangement Act, Policy P-084R
- income tax refund discounter, Policy P-123
- recovery of, addition to net tax, 231(3)
- • insurance claim payments excluded, Policy P-058R
- · where GST collected in full up front, Policy P-082R

Bagels, zero-rated, VI-III-1(m); Memo 4-3 paras. 88, 94, 112, 137

Baggage

- tourist
- • no GST on importation, VII-1
- • no HST on bringing into participating province, X-I-3
- transportation
- charges zero-rated when in connection with zero-rated passenger transportation, VI-VII-4(a); Memo 28-3 paras. 50-51
- • excluded from freight transportation service, VI-VII-1(1)
- • HST, IX-VI-4(a); Memo 28-3 paras. 65-66

Bailee

• storage charges, excluded from drop-shipment rules, 179(5)

Bailiff

- charges, treated as cost of repossessing property, Policy P-175
- seizure of property by, 183(3); Policy P-226

Bait

 for recreational fishing, taxable, VI-IV-8; Memo 4-4 para. 34; Info Sheet GI-049

Baked goods, whether zero-rated, VI-III-1(m); Memo 4-3 paras. 87–100

Rall

• fund-raising, charity or political party, V-V.1-2, V-VI-2(m)(iii), V-VI-3, 18

 HST on admission, where sold before October 24/96, 356(5); TIB B-077

Bank, see also Financial institution; Listed financial institution

- account, operation of constitutes financial service, 123(1)"financial service"(b)
- defined, 123(1); Interpretation Act s. 35(1); Memo 17-6 para.
- financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 25
- interference with remittance of tax, 323.1 (draft)
- of Canada, prescribed agent, 123(1)"specified Crown agent";
 Specified Crown Agents (GST/HST) Regulations s. 1(d)
- person appointed by to act as agent in respect of property, 266(1)"receiver"(c)
- remittance over \$10,000 required to be made electronically through, 278(3)(a); Memo 7-5 para. 3
- VISA and other payment card network fees, taxable, 123(1)"financial service"(r.6)

Bankruptcy, 265, see also Receiver

- corporation, of, liability of directors, 323(2)(c)
- exception to rule requiring certificate before distribution, 270(1)"representative"(a)
- GST collected before, not held in trust for Her Majesty, 222(1.1)
- GST collected during, held in trust for Her Majesty, 222(3)
- garnishment rules subject to the Bankruptcy Act, 317(3)
- general rules, 265(1)
- no net tax refund until all tax reported and paid, 225(6); Policy P-162
- no rebate until all tax reported and paid, 263.1; Policy P-162
- offset of taxes owing, Policy P-162
- purchaser, assessment by CRA of, Policy P-112R
- registration of bankrupt, Memo 2-1 para. 14(f)
- reporting period deemed ended and restarted, 265(1)(g)
- trustee
- assessment, 296(1)(f), 298(1)(g)
- • excluded from definition of "officer", 123(1)"office"(a)
- • fees of, transitional rules
- ••• GST, 341.1(2); Policy P-041 (obsolete)
- ••• HST, 357(2); TIB B-077
- • provides taxable service to the bankrupt, 265(1)(a)

Bar, Info Sheet GI-020

- candy or chocolate, taxable, VI-III-1(e); Memo 4-3 para. 45; Info Sheet GI-020
- cereal, Memo 4-3 paras. 93, 98-99; Info Sheet GI-020
- energy, Memo 4-3 paras. 52-54, 162
- fondue chocolate, taxable, Policy P-079R; Memo 4-3 paras. 48–49
- fruit, taxable, VI-III-1(1); Memo 4-3 paras. 85–86; Info Sheet GI-020
- gold or silver, see Precious metal
- granola, taxable, VI-III-1(h); Memo 4-3 paras. 62–65; Info Sheet GI-020
- ice cream or frozen yoghurt, taxable, VI-III-1(k); Memo 4-3 para. 75; Info Sheet GI-020
- juice, taxable, VI-III-1(j); Memo 4-3 paras. 49, 71; Info Sheet GI-020

Bar (cont'd)

- meal replacement, Memo 4-3 paras. 50, 52, 160–162; Info Sheet GI-020
- muffin, taxable, VI-III-1(m); Memo 4-3 paras. 93, 98–99; Info Sheet GI-020
- Nanaimo, taxable, VI-III-1(m); Memo 4-3 para. 93
- nut, taxable, Memo 4-3 para. 50; Info Sheet GI-020
- protein, Memo 4-3 paras. 52-54, 162
- serving liquor, food possibly not zero-rated, VI-III-1(q); Memo 4-3 paras. 136–139
- sesame, taxable, VI-III-1(e); Memo 4-3 para. 45; Info Sheet GI-020

Bare trust

 ignored for GST purposes, 123(1)"person" (Analysis); TIB B-068; Policy P-015

Barley, zero-rated, VI-IV-3; Memo 4-4 para. 15

Barrier (road or traffic)

 installing, replacing, repairing or removing, exempt, V-VI-21.1(a)

Barrister, see Lawyer

Barter

- between registrants, of same kind of property, deemed nil consideration, 153(3); Policy P-221
- constitutes supply, 123(1)"supply'
- exchange of natural gas at straddle plants, no GST, 153(6)
- GST calculated on value of thing bartered, 152(3), 123(1)"amount"

Barter exchange network, 181.3

- defined, 181.3(1)
- designation of, 181.3(2)-(4)
- no tax on providing units, 181.3(5)
- operation of, deemed not financial service, 181.3(6)

Barter unit

- deemed supplied for nil consideration, 181.3(5)
- defined, 181.3(1)"barter exchange network"
- provision of, no tax, 181.3(5)
- excluded from coupon rules, 181(1)"coupon"

Base fraction (of a tour package)

defined, 163(3) [repealed]

Base percentage (of a tour package)

• defined, 163(3)

Base value

• defined, for export distribution centres, 273.1(1)

Base vear

• used in calculation of threshold for annual reporting, 249(1)

Basic garbage collection services

- exempt, V-VI-20(h)
- meaning of, Policy P-199R

Basic groceries, see Groceries

Basic service

• defined, for export distribution centres, 273.1(1)

Basic tax content

- defined, 123(1); Memo 19-3-6 para. 6; Memo 19-4-2 paras. 20–22, 39, 44
- • of municipality or designated municipality, 198.1

 qualifying portion of, for landlord's rebate, TIB B-087 Appendix

Basic threshold amount

• defined, Streamlined Accounting (GST/HST) Regulations s. 2(2)

Basket of food, whether zero-rated, Memo 4-3 paras. 119, 164

Bath seat designed for disabled individual, zero-rated, VI-II-20; Memo 4-2 para. 30

Bean rod

• zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(c)(vi); Finance news release 93.039

Becoming a financial institution

• capital property change-in-use rules, 205(2)

Becoming a registrant, 171(1), (2), 251(1); Memo 400-3-1

- automatic annual filing, 245(2)(a)(ii); TIB B-072
- limitation on input tax credit eligibility, Policy P-018R
- taxi operator, other activities, 171.1(2)
- transitional rules for small suppliers, TIB B-041

Bed, hospital, see Hospital: bed

Bed and breakfast, Info Sheet GI-007

Bedding plants, taxable, Memo 4-4 para. 2

Beer, see also Alcoholic beverages; Excisable goods

- bottle or can, see Containers: returnable
- making kits, taxable, Memo 4-3 para. 15
- not eligible for non-resident business rebate for goods exported, 252(1)(a)
- taxable, VI-III-1(a); Memo 4-3 paras. 9-10
- zero-rated when exported in bond, VI-V-3; Memo 4-5-2 paras. 26, 27

Bees

- feed for, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(2.1)
- honey, zero-rated, VI-IV-1; Memo 4-4 para. 5
- kept to produce food, zero-rated, VI-IV-1; Memo 4-4 para. 4
- leafcutter
- • zero-rated after June 10, 1993, VI-IV-10; *Agriculture and Fishing Property (GST/HST) Regulations* Sch:1(1)(g)(xi); Memo 4-4 Schedule

Beets

- sugar, zero-rated, VI-IV-3
- vegetable, zero-rated as food, VI-III-1

Beneficiary

- of estate, distribution of business assets to, no tax, 167(2); Policy P-031; Memo 14-4 paras. 29–32
- of trust
- • charities, treated as individuals, 123(1)"personal trust"
- • distribution of property by trust deemed to be a supply, 269
- exemption for supply of farmland by trust for personal use, V-I-12
- • property appropriated by trust, tax on, 172(2), (3)
- •• supply by trust for benefit of, no input tax credit for, 170(1)(c)(iv); Memo 8-2 para. 20

Benefit

• automobile, Memo 9-2

Benefit (cont'd)

- available to member of organization, effect, 123(1)"non-profit organization", V-VI-17; Public Service Body Rebate (GST/HST) Regulations s. 4(1)(g); TIB B-025
- tax, general anti-avoidance rule, 274; TIB B-045
- taxable, to employee or shareholder, 173(1); Memo 9-1
- 4/104, 12/112 or other factor to be remitted, 173(1)(d)(vi)(B); Memo 9-1 paras. 40–41, Appendix C; Memo 9-2 para. 57, Appendix C
- to employee, no input tax credit on supply to employer, 170(1)(b); Memo 8-2 paras. 13-19
- to shareholder, partner, beneficiary or member, tax on appropriation of property, 172(2), (3)

Benefit amount

• defined, for taxable employee benefit rules, 173(1)(a)

Benzodiazepines

• zero-rated, VI-I-2(d.1)

Bets, 187, Memo 500-6-10

- at fund-raising event, V-V.1-3(c), V-V.1-6, V-VI-3.1
- amounts paid out excluded from taxable supplies for small supplier status, 148(1)
- exemptions
- • pari-mutuel system, on horse races, V-VI-5.2
- where supplied by charity or non-profit organization, V-V.1-6, V-VI-5
- horse racing, exempt, V-VI-5.2
- lotteries, 188(5); Games of Chance (GST/HST) Regulations s. 3; TIB B-018
- prizes, treatment of, 188
- supply deemed to be GST-included, 187
- where placed, 123(1)"place of amusement"

Beverages, Info Sheet GI-036

- alcoholic, see Alcoholic beverages
- allowance or reimbursement for, Memo 400-3-3, Memo 9-3 para. 53; Memo 9-4 para. 38
- carbonated, taxable, VI-III-1(c); Memo 4-3 paras. 17–18; Info Sheet GI-036
- dispensed, taxable, VI-III-1(o.4); Memo 4-3 para. 120
- expenses, input tax credit limited to 50%, 236(1); Memo 8-2 paras. 50–67
- • exception for charities, 236(2)
- • special rule for long-haul truck drivers, 236(1)(b)(ii)
- expenses, Ontario/BC HST input tax credit denied to large business, 236.01; New Harmonized Value-added Tax System Regulations, No. 2, s. 28(1)(h)
- fruit flavoured, Info Sheet GI-036
- not exempt in school cafeteria, V-III-12; School Cafeteria Food and Beverage (GST/HST) Regulations; Memo 20-5; TIB B-026
- • taxable, VI-III-1(d); Memo 4-3 paras. 19-26, 41
- fruit juice, zero-rated if 25% natural, VI-III-1(d); Memo 4-3 paras. 19–26
- heated for consumption, taxable, VI-III-1(o); Memo 4-3 paras. 101–103
- malt, taxable, VI-III-1(a); Memo 4-3 paras. 9, 17
- · milk, see Milk
- milk-based, zero-rated, VI-III-1(d); Memo 4-3 paras. 20–22
- returnable bottles, see Containers: returnable

- single servings other than unflavoured milk, taxable, VI-III-1(n); Memo 4-3 paras. 27–34
- sold at restaurant or bar, taxable, VI-III-1(q); Memo 4-3 paras. 136–139
- · supply by public sector body
- • meals-on-wheels for aged, disabled, etc., V-V.1-4, V-VI-15
- • to relieve poverty, suffering or distress, V-V.1-5.2, V-VI-14
- supply by school authority during extra-curricular activities, exempt, V-III-3; Memo 20-1
- supply to hospital or other health care facility, exempt, V-II-11
- supply to school, college or university for student meal plan or school cafeteria, exempt, V-III-14; Memo 20-5
- vending machine, taxable, VI-III-1(p); Memo 4-3 paras. 134–135
- zero-rated, generally, VI-III-1; Memo 4-3 paras. 1-3

Bid bond, see also Construction: bond

• meaning of, Memo 17-1 para. 18

Bill, see Invoice

Billing agent

- election to account for GST, 177(1.11)
- • revocation of election, 177(1.12)
- · election to account for tax
- • application to non-resident e-commerce supplier, 211.15

Billing location (for telecommunication service)

- · defined
- • GST, 142.1(1); TIB B-090

Billing period, see also Continuous supply (electricity, gas, etc.)

- defined, re ongoing services, 136.1(2)
- no effect on whether supply made in Canada, 136.1(2)(d)

Bingo, see Bets

Biologicals

- exempt, V-II-1"institutional health care service"(b), V-II-2
- zero-rated, VI-I; Memo 4-1

Birds

- mounts, Info Sheet GI-047
- poultry, zero-rated, VI-IV-1; Memo 4-4 para. 5
- wild, feed for not zero-rated, VI-IV-2; Memo 4-4 para. 9

Birth certificate, supply of, exempt, V-VI-20(d)

Bison, zero-rated, VI-IV-1; Memo 4-4 para. 5

Bitcoin, see Cryptoasset; Virtual payment instrument

Bituminous sands

• included in definition of mineral, 123(1)"mineral"

Blank media copying levy

 no tax on certain supplies by collecting body or collective society, 177.1

Blended payment, see Combined supply

Blended Sales Tax, see Harmonized Sales Tax

Blind person, see also Disabled person or disabled individual

- article designed for the use of, zero-rated, VI-II-30; Memo 4-2 para. 48
- guide dog and training individual to use dog, zero-rated, VI-II-33; Memo 4-2 para. 49

Blood products

• zero-rated, VI-I-2(a)

Blood-coagulation monitor or meter

• zero-rated, VI-II-29.1(a)

Blood-coagulation testing strips

• zero-rated, VI-II-29.1(b)

Blood-glucose monitor or meter, zero-rated, VI-II-28; Memo 4-2 para. 46

Blood-ketone testing strips, VI-II-29; Memo 4-2 para. 47

Blood-sugar testing strips, VI-II-29; Memo 4-2 para. 47

Blood products

- plasma expander, zero-rated, VI-I-2(g)
- supplied for no consideration, not exempt, V-V.1-5, V-VI-10

Blood testing, see Laboratory services

Blue box pickup

 whether exempt as basic garbage collection service, Policy P-199R

Boarding house, see also Hotel

• meaning of, Policy P-099

Boat, see Ship or boat

Bond, see also Securities; Security: for payment of tax

- · bid, see Bid bond; Construction: bond
- · certificate
- • no GST on importation, VII-10
- • no HST on bringing into participating province, X-I-17
- construction, see Construction: bond
- export of spirits, beer and tobacco in, zero-rated, VI-V-3; Memo 4-5-2 paras. 26, 27
- goods held in, 144, VI-VII-1(1)"place outside Canada"
- maintenance, see Maintenance: bond; Construction: bond
- payment, see Payment bond; Construction: bond
- performance, see Construction: bond; Performance: bond
- receiver appointed under, 266(1)"receiver"(a)
- · right to services or facilities provided with
- • constitutes membership, 123(1)"membership"
- • deemed not a supply of a financial service, 140

Bonded warehouse, see also Bond: goods held in

- defined, for export distribution centres, 273.1(1)
- supply of goods in, deemed outside Canada, 144

Bonus or prize

 promotional, given by lottery corporation to ticket distributor, ignored, 188.1(5)(a)

Book

- audio recording of, rebate to public service body, 259.1(2)(b);
 Memo 13-4
- for charitable purposes
- • no GST on importation, VII-1
- • no HST on bringing into participating province, X-I-5
- mailed from outside Canada, 143.1, VII-7.1; Publications Supplied by a Non-resident Registrant (GST/HST) Regulations
- • subscription agent considered supplier, Policy P-185R
- rare, 123(1)"specified tangible personal property"
- rebate of provincial tax, reduces HST, 214.1, 220.09(3), 231.1, 234(3); *Deduction for Provincial Rebate (GST/HST) Regulations*; Memo 13-4

- •• disclosure of rebate not required, 223(1.2); Memo 13-4 para.
- rebate to public service body, 259.1; Memo 13-4
- soliciting orders in Canada, 240(4)

Books

 sold with CD-ROM or Web access, see Composite property (book with CD or DVD)

Books and records, 286; Memo 15-1

- computerized, Memo 15-2
- electronic data processing (EDP), Memo 15-2
- form required, 286(1)
- outside Canada, 286(1); Memo 15-1 para. 18; Policy P-055R (obsolete)
- period for retention
- • demand by Minister for longer period, 286(5)
- • normally, 286(3)
- • permission for early disposal, 286(6)
- • while appeal pending, 286(4)
- requirement to keep, 286(1)

Bottles, see Containers and coverings

Bounced cheque, see Cheque: dishonoured

Bounty payments, *see* Informant payments (for leads on international tax evasion)

Brace

- orthodontic (braces for teeth), zero-rated, VI-II-11.1; Memo 4-2 para. 19
- orthopaedic or orthotic, made to order, VI-II-23; Memo 4-2 para. 39

Branch or division, Memo 2-4, *see also* Permanent establishment

- authorization for separate rebate applications, 261(5)–(6)
- authorization for separate returns, 239, 259(10)–(11); Memo 2-
- public service body, of
- • application to be separate for small supplier status, 129
- separate applications for printed books rebate, 259.1(5)
- supplies between (inside/outside Canada)
- • exported property and services, 132(4)
- • imported intangible property and services, 220; TIB B-095
- unincorporated organizations
- • application for one to be deemed a branch of another, 130
- whether a separate person, Memo 2-4 para. 20

Breach of contract, 182

Bread and bread products, zero-rated, VI-III-1(m); Memo 4-3 para. 88

Breakfast cereal, zero-rated, VI-III-1(f), (h), (i); Memo 4-3 paras. 5, 55, 62, 66

• ingredients for, zero-rated, Memo 4-3 para. 147

Breathing apparatus, zero-rated as medical device, VI-II-5; Memo 4-2 para. 7

Bridge

- construction of, to link Canada and USA, supplies to international authority zero-rated, VI-VIII-2; Memo 18-3 paras. 19-22
- meaning of, VI-VIII-2 (Analysis)
- · New Brunswick to PEI, see Northumberland Strait Crossing

Bridge (cont'd)

• tolls, exempt, V-VIII-2; Memo 28-1 paras. 53-64

Bringing into a participating province

- from other province, TIB B-079, B-XX5
- • carrier not liable, 220.02
- exclusions from HST, X-I
- • exclusive products of direct sellers, no HST, X-I-26
- • goods for use in commercial activity, no HST, X-I-22
- • goods in transit, 220.03
- • goods previously removed from province, no HST, X-I-21
- • on behalf of another person, 220.02
- • selected listed financial institution, 220.04
- tax on, 220.07
- • assessment, 296(1)(b), 298(1)(d.1)
- • exception where offsetting input tax credit available, X-I-22
- from outside Canada, TIB B-081
- • tax on, 212.1, 349(3)

British Columbia

- Harmonized Sales Tax 2010–2013, Sch. VIII; British Columbia HST Regulations s. 2
- elimination of HST April 2013, British Columbia HST Regulations s. 2
- provincial government entities pay GST/HST, 122; Memo 18-2 para. 23; Info Sheets GI-073, GI-155

Broadcasting, see also Advertising

- reproduction rights, charged by collective, 177(2)
- Web-based, considered a telecommunication service, TIB B-090

Brochure

• meaning of, for printed-book rebate, Policy P-234 (obsolete)

Broker, see Insurance: broker; Investment dealer

Brokerage, see Customs brokerage services

Brownies, taxable where packaged less than six, VI-III-1(m); Memo 4-3 paras. 87, 89, 137

Budget payment arrangement (equal billing plan), see also Continuous supply (electricity, gas, etc.)

• credit note on reconciliation, 232(1)

Buffalo, zero-rated, VI-IV-1; Memo 4-4 para. 5; Policy P-040 (obsolete)

Builder

- addition to multiple unit residential complex, deemed separate supply when sold by, 136(3)
- agreement for sale made before October 14, 1989, transitional rules, 336(2)–(4)
- British Columbia
- information requirements during British Columbia transition out of HST, Info Sheet GI-132
- • new housing, Info Sheet GI-084
- conversion of property to residential use, person deemed to be, 190(1)(f)
- defined, 123(1), 190(1)(f); Memo 19-2 paras. 1–5, 15–18; Memo 19-2-1 paras. 5–7; Memo 19-3 para. 6
- liability of
- • FST new housing rebate, 121(2.1)

- GST new housing rebate, 254(6), 254.1(6); Memo 19-3 para. 23
- NETFILE filing requirement, see Electronic filing: mandatory
- new housing rebate (British Columbia)
- • calculation of, where rebate transferred, Info Sheet GI-130
- new housing rebate (FST)
- • assignment of rebate by purchaser, 121(6) (Analysis); TIB B-010
- • calculation of, Memo 500-4-5-2; Policy P-042
- • specified single unit residential complex, 121(2)
- new housing rebate (GST)
- • calculation of, where rebate transferred, Memo 19-3-1-1, 19-3-1-2; Policy P-042
- • deduction from net tax of builder, 234(1)
- • forward application on behalf of purchaser, 254(5), 254.1(5)
- • pay or credit directly to purchaser, 254(4), 254.1(4)
- new housing rebate (Ontario HST)
- pay or credit directly to purchaser, New Harmonized Valueadded Tax System Regulations, No. 2, s. 41(6)
- new housing rebate (PEI)
- calculation of, where rebate transferred, Info Sheets GI-147, GI-148
- non-registrant, information for
- • PEI, Info Sheet GI-164
- · of residential care facility, Info Sheet GI-045
- Ontario, new housing, Info Sheet GI-083
- PEI, new housing, Info Sheets GI-146, GI-153
- • temporary recapture of input tax credits, Info Sheet GI-165
- · person who is not
- sale of residential complex, exempt, V-I-2; Memo 19-2-1 paras. 20–24, 26–28; Info Sheet GI-004
- sale of residential complex, exempt, V-I-3, 4, 5; Memo 19-2-1 paras. 20–24, 26–28
- self-supply rules, 191
- substantial renovator of complex deemed to be, 123(1)"builder"(a)(iii)

Building, see also Real property; Multiple unit residential complex; Residential complex

- mixed-use, new housing rebate, Memo 19-3-7, paras. 19-22
- relocated from existing land, Memo 19-2-4 paras. 11–18; Policy P-154
- residential lease to person making exempt lease, exempt, V-I-6.1(b); Memo 19-2-2 paras. 12–13
- • combined lease, 136.1(1)
- • rebate to lessor, 256.1; Memo 19-3-5
- • transfer of possession attributed to builder, 191(10)
- sale of, with lease of land, exempt, V-I-5.1; Memo 19-2-1 paras. 24, 34, 40–41, 43
- space in, supplied to joint venture participant, Policy P-172R

Bulk fuel, eligible for non-resident business rebate, 252(1)(c)(i)

Bulls, zero-rated, VI-IV-1; Memo 4-4 para. 5

Burial, see also Funeral services (prepaid): transitional rules

- site, purchaser must pay GST to vendor
- • Ontario/BC transitional rule, New Harmonized Value-added Tax System Regulations s. 47.1

Burial (cont'd)

- • PEI transitional rule (2013), New Harmonized Value-added Tax System Regulations s. 58.3
- • purchaser must pay GST to vendor, 221(2)(b)

Burn garments, zero-rated, VI-II-36; Memo 4-2 paras. 52, 53

Bus, see Conveyance; Passenger transportation service

Business

- acquisition of
- • by financial institution, change-in-use rules, 205(4)–(5)
- • from financial institution, purchaser deemed a financial institution, 149(3); Policy P-021
- liability of purchaser for vendor's unremitted tax, Policy P-012R
- · carrying on in Canada
- • meaning of, 240(1) (Analysis); Memo 2-5; Policy P-051R2
- • obligation to register for GST, 240(1)
- constitutes commercial activity, 123(1)"commercial activity"(a); Policy P-176R
- deceased, supply of assets of, 167(2); Policy P-031; Memo 14-4 paras. 29–32
- defined, 123(1), 266(1); Policy P-167R, P-176R, P-205R
- contrasted with adventure in the nature of trade, Policy P-059; Memo 19-5 Appendix C
- • profession, calling, trade or undertaking, Policy P-167R
- • reasonable expectation of profit, Policy P-176R
- • regular and continuous basis, Policy P-205R
- fixed place of, Policy P-208R
- goodwill, sale of, no tax, 167.1; Memo 14-4 para. 26
- inactive, temporary cessation of filing, 238.1, TIB B-072
- income from a, see under Income Tax Act provisions and terms
- input, see Business input; Input tax credit
- number, see Business Number
- profit test, Policy P-176R
- sale of, see Sale: business
- seasonal, temporary cessation of filing, 238.1, TIB B-072
- venture in Canada, advice to non-resident re establishing, zerorated, VI-V-9; Memo 4-5-3 paras. 51–54; Policy P-173
- whether real property used in, Memo 19-5 Appendix A

Business information

• required before net tax refund paid, 229(2.1)

Business input

- · defined, for ITC allocation of financial institutions
- for investment plan HST rules re non-residents, 141.02(1), 225.4(1)

Business Number

- assignment of, 241, 295(1); Memo 2-1 paras. 19–26
- defined, 295(1)
- disclosure to public, 295(5.02), (5.03)
- disclosure of information to other governments, 295(5)(j)
- issuance of, 241
- other governments required to use to permit disclosure of information, 295(5.01)

Butterfly transactions, 186(1), (3); Policy P-045

 election between related corporations, 156(1)"temporary member"

Button infuser

 zero-rated as medical device, VI-II-21.2; Memo 4-2 paras. 34, 35

Buy-back of vehicle under Ontario Arbitration Plan, Policy P-

Buyer, see also Recipient

• designation as, 178.6(3)

Buying groups, 178.6; Memo 3-1 paras. 94–96

- application for designation as buyer, 178.6(2)
- effect of designation as buyer, 178.6(5)
- revocation of designation as buyer, 178.6(4)

C

CARS, see Canadian accommodation related supply

CD-ROM

sold with book, see Composite property (book with CD or DVD)

CDSL Canada Ltd.

• deemed closely related to every credit union, Closely Related Corporations (GST/HST) Regulations s. 4(a)

CIDA, see Canadian International Development Agency programs

CNIB, see Canadian National Institute for the Blind

CRA, see Canada Revenue Agency

CRTC, see Canadian Radio-Television and Telecommunications Commission

CSS, see Cosmetic service supply

CTC, see Continuous transmission commodity

CUE Datawest Ltd.

• deemed closely related to every credit union, Closely Related Corporations (GST/HST) Regulations s. 4(b)

Cab driver, see Taxi operator

Cable

- laying or repair, supply to non-resident for use in ship, zero-rated, VI-V-2(c); Memo 4-5-2 para. 21(c)
- television, see also Telecommunication service
- • repeal of telecommunication programming tax, 117(2), (3)

Cafeteria

- meals, taxable, VI-III-1(q); Memo 4-3 paras. 136-139
- meals in health care facility not exempt, V-II-1"institutional health care service"(g)
- school, supplies by, exempt, V-III-12; School Cafeteria Food and Beverage (GST/HST) Regulations; Memo 20-5; TIB B-026
- school, supplies to, exempt, V-III-14; Memo 20-5

Caisse populaire, see Credit union

Cakes, taxable where packaged less than six, VI-III-1(m); Memo 4-3 paras. 87, 89, 93, 137

- decorations (edible), zero-rated, Memo 4-3 para. 46
- ice cream, Memo 4-3 para. 83
- rice, zero-rated, Memo 4-3 para. 94
- wedding, whether zero-rated, Memo 4-3 para. 100

Calcium chloride

• included in definition of mineral, 123(1)"mineral"

Calculation

- of GST/HST when no pennies in circulation, Info Sheet GI-131
- of input tax credits, 169
- of net tax, 225

Calendar quarter

- defined, 123(1)
- reporting period for non-registrants for Division IV, 217"reporting period"(b) [repealed]
- · used in determining fiscal periods, 243
- · used in determining small supplier status, 148

Calendar year

• defined, Interpretation Act s. 37(1)(a)

Call centre

· exported services zero-rated, VI-V-23.1

Camp

- camping trailer not a mobile home, 123(1)"mobile home"
- children's, operated by public service body, Info Sheet GI-037
- day camp for children 14 and under, exempt, V-VI-12(a); Info Sheet GI-037
- for underprivileged or disabled individuals, exempt, V-VI-12(b), 13; Info Sheet GI-037
- use of campground, part of tour package, 163(3)

Camping accommodation

• defined, 252.4(0.1); Memo 27-3 paras. 7-9

Camping trailer, excluded from definition of "mobile home", 123(1)

Can, see Containers: returnable

Canada

- carrying on business in, 240(1) (Analysis); Memo 2-5; Policy P-051R2
- defined
- • for Division III (importation of goods), 123(3)
- • generally, 123(2); Policy P-152R
- · emigration from, see Leaving Canada
- · export from, see Exports
- government of, see Government
- immigration, see Immigration
- import into, see Importation
- obligation to collect tax, 122(a)
- obligation to pay and collect tax, 122(a)
- resident of, see Residence
- services performed in by non-resident, voluntary registration, 240(3)(b)(ii)
- situated in, meaning of, Memo 4-5-3 para. 22; Policy P-010, P-169R
- soliciting orders for delivery to, 240(3)(b)(i), (4)
- supply made in (or outside), 142-144

Canada Customs, see Customs Act

Canada Customs and Revenue Agency, see also Canada Revenue Agency

• defined, 123(1)"Agency"

Canada Deposit Insurance Corporation

• is listed financial institution, 149(1)(a)(v); Memo 17-6 para. 20

Canada Mortgage and Housing Corporation

Canada Revenue Agency, see also Minister (of National Revenue); Receiver General

- actions of, do not affect tax liability, 299(2), (5)
- administration of employee/partner rebate, 253(5)
- "Agency" defined, 123(1)
- audit and inspection by, see Audit by Canada Revenue Agency
- · communication of information, 295
- confidentiality of information, 295
- defined, 123(1)"Agency"
- delegation of powers to officials, 275(3)
- electronic filing, authorization for, 278.1(3); Memo 7-5 para. 5
- employees, communication of personal information in course of discipline or supervision, 295(5)(g), 295(5.1)
- informant program, *see* Informant payments (for leads on international tax evasion)
- offices, see canada.ca/cra-offices
- rulings, Memo 1-4
- seizure of documents under search warrant, 290
- technical information program, Memo 1-1
- · waiver, see Waiver
- web site, see canada.ca/gst-hst

Canadian accommodation related supply, see also Nonresident e-commerce supplier (e.g., Netflix, AirBNB)

• defined, 211.1(1)

Canadian activity

- · defined, for importation of service from foreign branch
- • for investment plan HST rules re non-residents, 217, 225 4(1)
- includes activity of member of Lloyd's association or other person, 217.1(9)(b), 217.1(11)(b), (c)

Canadian Broadcasting Corporation

• prescribed agent, 123(1)"specified Crown agent"; Specified Crown Agents (GST/HST) Regulations s. 1(a)

Canadian customs waters

• defined, Value of Imported Goods (GST/HST) Regulations s. 2(1)

Canadian element (of a service)

 defined, for HST place of supply rules, IX-V-1; TIB B-090; New Harmonized Value-added Tax System Regulations s. 2

Canadian Film Development Corporation

• prescribed agent, 123(1)"specified Crown agent"; Specified Crown Agents (GST/HST) Regulations s. 1(b)

Canadian Forces

• members of, deemed resident in Canada, 132(1)(d)

Canadian goods returned

• no tax on importation, Non-Taxable Imported Goods (GST/HST) Regulations s. 3(n)

Canadian government, see Federal government

Canadian Imperial Bank of Commerce case (2021) overturned, 123(1)"financial service"(r.6)

Canadian indicator

• defined, for non-resident e-commerce, 211.11(2)(a)

Canadian International Development Agency programs

 individual providing services under, deemed resident in Canada, 132(1)(d)

Canadian National Institute for the Blind

• supply to, by or on the order of, zero-rated, VI-II-30; Memo 4-2 para. 48

Canadian partnership

- deemed closely related to other partnership or corporation, 156(1.1); Memo 14-8
- defined, 156(1); Memo 14-5 paras. 21-24

Canadian Payments Association, see also Clearing and settlement services

 services, included in financial services, 123(1)"financial service"(m); Financial Services and Financial Institutions (GST/HST) Regulations s. 3

Canadian Psychoanalytic Society, V-II-12 [repealed]

Canadian Radio-Television and Telecommunications Commission

· cost-recovery fees to licensees, exempt, 189.1

Canadian Register of Health Service Providers in Psychology, V-II-1"practitioner"(c)

Canadian rights (to intangible property)

 defined, for HST place of supply rules, New Harmonized Value-added Tax System Regulations s. 2

Canadian Wheat Board

• prescribed agent, 123(1)"specified Crown agent"; Specified Crown Agents (GST/HST) Regulations s. 1(c)

Cancellation, see also Revocation

- contract, 182; Policy P-218R
- FST wholesaler's licence, 119(2)
- import certificate, 213.2(3)
- · penalty and interest, see Waiver: penalty and interest
- registration, 242; Memo 2-7
- • group registration, 242(1.1)–(1.4)

Candidate for political office

 donation included in consideration for admission to fundraising event, V-VI-18.2

Candies, candy floss, etc., taxable, VI-III-1(e); Memo 4-3 paras. 45–54

Cane

- for use by disabled individual, zero-rated, VI-II-27; Memo 4-2 para, 45
- sugar, zero-rated, VI-IV-3; Memo 4-4 para. 15

Cannabis, see Excisable goods

Capital asset

 defined, Streamlined Accounting (GST/HST) Regulations s. 2(1)

Capital cost allowance, see under Income Tax Act provisions

Capital expense, see Capital property; Improvement (to capital asset or property)

Capital property, 195–211, *see also* Change in use of capital property; Input tax credit; Personal property; Real property; Use: in commercial activities

- appropriation of property for use as, 196.1
- ceasing to be a registrant, 200(2), 203(2), 206(4)
- change-in-use rules, 195–211; Memo 19-4-2

- conversion of non-capital property to, 196.1
- cost of, Policy P-060
- defined, 123(1)
- • leasing or rental assets, Policy P-133
- excluded from taxable supplies for determining reporting period, 249
- FST inventory rebate, excluded from, 120(1)
- government, of, sale of, 200(4)
- improvement to, see also Improvement (to capital asset or property)
- • aircraft, 202(3)
- • defined, 123(1)"improvement"
- • passenger vehicle, 202(1), (3)
- • personal property, 199(4)
- • real property, by individual, 208(4)
- • real property, by public sector body, 209(2)
- input tax credit for, 169, 195-211
- lease of, before August 8, 1989, grandfathered, 340(6)
- personal property, 199-205; Memo 400-3-9
- • acquisition of, 199(2)
- • ceasing to use in commercial activities, 200(2)
- • decrease in use in commercial activities, 200(2)
- • defined, 123(1)"personal property", 195
- • financial institution, of, 204, 205
- • government, of, 200(4)
- • improvement to, 199(4)
- increase in use in commercial activities, 199(3)
- • passenger vehicle, see Automobile
- • sale of, 141.1, 141.2, 200(3)
- prescribed property deemed personal property, 195
- real property, 206–211
- • ceasing to use in commercial activities, 206(4)
- • decrease in use in commercial activities, 206(5)
- • defined, 123(1)"real property", 195
- • increase in use in commercial activities, 206(2), (3)
- • individual, of, 207, 208
- • public sector body, of, 209-211
- residential complex deemed not capital property, 195.1(1);
 Memo 19-2-3 para. 103
- • sale of, additional credit, 193(1); Memo 19-2-3 para. 102, Appendix
- · sale of
- • aircraft, 203(3)
- • automobile, 203(1), (3), (4); Memo 8-2 para. 32
- • by charity, not included in simplified accounting calculation, 225.1(1)(a), 225.1(2)A(b)(i); Info Sheet GI-066
- • by designated municipality, 141.2(2), 166(c)
- • by municipality, 141.2(1), 166(b)
- • government, of, 200(4)
- • passenger vehicle, 203(1), (3), (4); Memo 8-2 para. 32
- • personal property, 141.1(1), 200(3)
- real property, 193(1); Memo 19-2-3 para. 102, Appendix
- • seized property, by credit union, Policy P-026
- • used in commercial activities, 141.1(1)
- use in financial services deemed use in commercial activities, 198

Capital, raising, see Raising capital

Capital stock, see Corporation; Share

Car, see Automobile

Carbon emission allowance, see Emission allowance

Carbonated beverages

- FST inventory rebate for, TIB B-003; GST 900 para. 5(a)(iv)(D)
- not exempt in school cafeteria, School Cafeteria Food and Beverage (GST/HST) Regulations s. 3(a); Memo 20-1; TIB B-026
- returnable bottles and cans, see Containers: returnable
- taxable, VI-III-1(c); Memo 4-3 paras. 17-18

Card

- calling, see Telecommunication service: place of supply
- · credit, see Credit: card

Care

- · child, see Child care
- · chronic, see Chronic care
- medical, see Health care services, exempt
- of person with limited physical or mental capacity, exempt, V-IV-3
- respite, V-IV-3

Cargo container, see also Conveyance

- emergency repair for non-resident, zero-rated, VI-V-6, VI-V-6.2; Memo 4-5-3 paras. 39–42, 44–45
- meaning of, Policy P-067R; Memo 4-5-3 para. 39
- storage for non-resident, zero-rated, VI-V-6.2; Memo 4-5-3 paras. 44–45

Carrier, see also Freight transportation service

- bringing goods into HST province, not liable for tax, 220.02; TIB B-079, B-XX5
- common, not required for trucking of exported goods for zerorating, VI-V-1; Memo 4-5-2 paras. 39, 40
- defined, 123(1); Memo 28-2 paras. 3-4, 94
- excise tax transportation rebate program, 68.4; Memo 800-1 paras. 21-23
- · export by
- • evidence of, Memo 4-5-2
- • supply zero-rated, VI-V-12; Memo 4-5-2
- freight transportation service, VI-VII-1(1); Memo 28-2
- interline freight settlements, zero-rated, VI-VII-11; Policy P-157 (obsolete)
- provided to another carrier, zero-rated, VI-VII-11; Policy P-157 (obsolete)
- • transitional rules
- • GST, 343
- ••• HST, 359; TIB B-077
- • zero-rated, VI-VII-7
- fuel supplied to, zero-rated, VI-V-2, 2.1; Memo 4-5-2 paras. 21–25; Policy P-006, P-076
- · media, see Software
- newspaper, Alternate Collection Method, Info Sheet GI-019
- not required to collect tax where no knowledge property not being exported, 221(3)
- shipping charges excluded from definition of "commercial service", 123(1)"commercial service"(b); Policy P-151
- unregistered non-resident, supply to zero-rated, VI-V-2; Memo 4-5-2 paras. 21–23; Memo 4-5-3 paras. 27–31; Policy P-076

• where more than one, VI-VII-1(2); Policy P-157 (obsolete)

Carrier media

• defined, Value of Imported Goods (GST/HST) Regulations s. 2(1)

Carryforward

• input tax credits, 225(1)B(a), 225(4)

Carrying on business in Canada, 240(1) (Analysis); Memo 2-5; Policy P-051R2

• electronic commerce, TIB B-090

Cash

• penny phased out, Info Sheet GI-131

Cash register

- sales suppression software, see Zapper software (or hardware)
- to handle GST in 1991, TIB B-003

Cash register slip, see Invoice

Casino

- game, Memo 500-6-10, see also Bets
- operator, deemed distributor, 188.1(1)"distributor"

Casino operating service

• defined, Games of Chance (GST/HST) Regulations s. 5(1)

Cassette, see Audio-cassette supplied with publication

Casual donation under \$60

- no GST on importation, VII-1
- no HST on bringing into participating province, X-I-6

Catalogue

• direct seller rules, see Sales aid

Catering service, see also Meals

- food taxable, VI-III-1(0.5); Memo 4-3 paras. 121-133
- for hospital or other health care facility patients, exempt, V-II-11
- meaning of, Policy P-224; Memo 4-3 paras. 122-133
- school cafeteria, exempt, V-III-12; Memo 20-5
- supplied by a charity, exempt, V-V.1-1
- supplied by a public institution, taxable, whether exempt, V-VI-2(e), (g)
- supplied to public sector body for use in Meals-on-Wheels, exempt, V-V.1-4, V-VI-15
- to school, university or college, for students, exempt, V-III-14; Memo 20-5

Catheter

- as ileostomy, colostomy or urostomy appliance, zero-rated, VI-II-25; Memo 4-2 para. 43
- for incontinent person, zero-rated, VI-II-37; Memo 4-2 para.
- for subcutaneous injection (button infuser), zero-rated, VI-II-21.2; Memo 4-2 paras. 34, 35
- urinary, see Intermittent urinary catheter

Cattle, zero-rated, VI-IV-1; Memo 4-4 para. 5

Causeway

• New Brunswick to PEI, see Northumberland Strait Crossing

CCRA, see Canada Customs and Revenue Agency

Ceasing to be a financial institution

• capital property change-in-use rules, 205(3)

Ceasing to be a registrant, 171(3), (4), 242, 251(2); Memo 400-3-1

- independent sales contractor, 178.5(11); Memo 14-1 para. 58
- taxi operator, other activities, 171.1(3)

Ceasing to use property in commercial activities, see Change in use of capital property

Ceding commission

· defined, for Division IV tax on financial institutions, 217

Cemetery plot

- Ontario/BC transitional rule, New Harmonized Value-added Tax System Regulations s. 47.1
- PEI transitional rule, New Harmonized Value-added Tax System Regulations s. 58.3
- purchaser must pay GST to vendor, 221(2)(b)

Cemetery property and services, TIB B-093

Central paymaster

 rules for financial institutions HST allocation, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 21

Cents, fractions of, 165.2(2)

Cereals

- agricultural purposes, VI-IV-2
- · breakfast, see Breakfast cereal, zero-rated
- in snack mixtures, taxable, VI-III-1(i); Memo 4-3 paras. 66-70

Certificate

- birth, death, etc., supply of exempt, V-VI-20(d)
- by Minister, of tax owing, effective as judgment, 316
- clearance, 270
- drop-shipment, 179(2)(c)
- export, 221.1(2), see also Export certificate
- export distribution centre, 273.1(7), see also Export distribution centre
- exporter, VI-V-1; Memo 4-5-2 paras. 12-20
- false statement in, penalty, 285
- gift, 181.2; Policy P-202
- import, 213.2
- Indians, for exemption from GST, 165 (Analysis)
- professional or trade course, fee for, exempt, V-III-6(b); Memo 20-4
- required before distribution of property, 270
- share, bond, etc.
- • no GST on importation, VII-10
- • no HST on bringing into participating province, X-I-17

Certification process, see also Testing service

• goods imported for, Goods Imported for Certification Remission Order

Certified institution (employing disabled individuals in manufacturing)

- deduction from net tax, 230.2(2)
- defined, 230.2(1), III-XIV-2

Cervical collar

- custom-made, zero-rated, VI-II-23; Memo 4-2 para. 39
- taxable, Memo 4-2 para. 39

Cessation of filing, temporary, 238.1; TIB B-072

Chair

- · commode, zero-rated, VI-II-20
- invalid or commode, designed for disabled individual, VI-II-14; Memo 4-2 para. 22
- lift chair, Info Sheet GI-133
- specially designed for disability, zero-rated, VI-II-14.1
- wheel, see Wheelchair, zero-rated

Chairman or chairperson, of unincorporated body

• liable to pay or remit tax for the body, 324(1)(a)

Chalet, see Vacation properties

- Chamber of commerce
 free tourist literature
- • no GST on importation, VII-3(b)
- • no HST on bringing into participating province, X-I-12(b)

Change in use of capital property, *see also* Capital property; Conversion

- caused by operation of legislation, 198.1(a) [repealed]
- · decrease in use in commercial activities
- • personal property
- • financial institution, 204(2), 205(1), (3)
- • general rule, 200(2)
- • individual or partnership, automobile or aircraft, 203(2)
- real property, Memo 19-4-2
- • general rule, 206(4), (5)
- • individual, 207(1), (2)
- • public sector body, 209(1)
- ••• residential, Memo 19-2-3 paras. 77-100
- election for exempt supplies, before October 1992, Policy P-072 (obsolete)
- exclusive use, meaning of, 123(1)"exclusive", 141
- financial institution, 204, 205
- imported intangible property, 198.2 [repealed]
- increase in use in commercial activities
- • personal property
- • financial institution, 204
- • general rule, 199(3)
- ••• individual or partnership, automobile or aircraft, 202(4); Memo 8-2 para. 32
- • real property, Memo 19-4-2
- • general rule, 206(2), (3)
- • individual, 208(2), (3)
- • public sector body, 209(3)
- ••• residential, Memo 19-2-3 paras. 77-100
- insignificant changes, 197
- intended use deemed to be actual use, 196
- last acquisition or importation, meaning of, 195.2
- method of determining, 141.01(5); Memo 8-3 paras. 33–49; Memo 700-5-1
- • financial institution, 141.02
- non-capital property to capital property, 196.1
- resulting from legislative amendment, 198.1(a) [repealed]
- used goods supplied before 1994, 198.1(b) [repealed]

Change to GST return, Policy P-149R

Channel

• telecommunications, see Telecommunications channel

Charge card, see Credit: card

Charging section, see Imposition of tax (charging provisions)

Charity, Info Sheet GI-067, see also Public institution; Public sector body; Public service body

- allowances paid to volunteers, 174(a)(iii); Memo 9-3; Policy P-075R
- ball, V-V.1-2, V-VI-2(m)(iii)
- benefits to members, appropriation of property, tax on, 172(2)
- bingo, Memo 500-6-10, see also Bets
- bottle return deposits, 226.1 [repealed]
- concert
- amateur, exempt, V-VI-11
- fund-raising, exempt, V-V.1-2, V-V.1-3, V-VI-2(m)(iii), V-VI-3
- • GST/HST based on value of supply, 164 [History]
- • not exempt, V-VI-2(m)(iii)
- constitutes public sector body, 123(1)"public sector body"
- constitutes public service body, 123(1)"public service body"
- contingent beneficiary of trust, 123(1)"personal trust"
- • sale of land by trust exempt, V-I-9
- • sale of land to trust exempt, V-V.1-1(k), V-VI-25(c)
- defined, 123(1), 259(1); Public Service Body Rebate (GST/HST) Regulations s. 2
- · designated, see Designated charity
- dinner, ball, concert or show, V-V.1-2, V-VI-2(m)(iii)
- disabled, assisting, election to be taxable, 178.7
- · donation to
- • no GST on importation, VII-4
- • no HST on bringing into participating province, X-I-13
- • no tax on importation, VII-4
- property or service supplied for donation, taxable only on value, 164
- • where included in consideration for supply, V-V.1-2
- excluded from definition of *de minimis* financial institution, 149(4.1)(a)(i); Memo 17-7 para. 5
- excluded from definition of non-profit organization, 123(1)
- exempt supplies by, V-V.1, V-VI, especially V-VI-2, V-VI-25; Memo 300-4-6
- • bets on casino games and races, V-VI-5.2
- bingos, V-VI-5.1; Games of Chance (GST/HST) Regulations s. 4; TIB B-018
- • generally, V-V.1-1, V-VI-2
- • raffle tickets, V-VI-5.1; Games of Chance (GST/HST) Regulations s. 4; TIB B-018
- • volunteer-run business activities, V-VI-3
- fund-raising event, V-V.1-2, V-VI-2(m)(iii)
- input tax credits, simplified calculation, 225.1(10), Streamlined Accounting (GST/HST) Regulations ss. 21.1–21.4; Info Sheet GI-066
- meals and entertainment paid by, 236(2)
- net tax calculation, 225.1; Info Sheet GI-066
- · no HST self-assessment on goods donated, X-I-13
- no tax on importation of goods donated, VII-4
- provincial sales tax rebate, HST provinces, 259(3)(b), 259(4)(b), 249(4.2), 259(4.21)
- rebate for printed books, 259.1; Memo 13-4
- rebate for property and services exported, 260; Policy P-132
- rebate of 50% of GST paid, 259(1)"specified percentage"(a); 259(3)(a); TIB B-025; Memo 500-4-9

- • extended definition of "charity" for rebate, 259(1)
- • separate filing by branches or divisions, 259(10)–(11)
- • simplified computation, election, 259(12); *Public Service Body Rebate (GST/HST) Regulations* ss. 6–8
- • specified percentage, 259(1)"specified percentage"
- rebate of percentage of HST paid, 259(1)"specified provincial percentage"; 259(3)(b); *Public Service Body Rebate (GST/HST) Regulations* s. 5(c)(i)
- • extended definition of "charity" for rebate, 259(1)
- • specified percentage, 259(1)"specified provincial percentage"; *Public Service Body Rebate (GST/HST) Regulations* s. 5(c)(i)
- reimbursements of volunteers, 175; Memo 9-4; Policy P-075R
- reporting period of, 245(2)(a)(iii)
- simplification package, 123(1)"charity"
- simplified accounting, 225.1; Info Sheet GI-066
- small supplier threshold, \$30,000 taxable supplies or \$175,000 gross revenues, 148.1
- volunteer reimbursements and allowances, 174(a)(iii), 175; Memo 9-3, 9-4; Policy P-075R

Charter flights, Info Sheet GI-170

Chattels, seizure of for non-payment of tax, 321, 322

Cheese

- curls, taxable, VI-III-1(f); Memo 4-3 para. 55
- platters, prepared, taxable, VI-III-1(o.3); Memo 4-3 paras.
- puffs, taxable, VI-III-1(f); Memo 4-3 para. 55
- zero-rated generally, as food, VI-III-1

Cheque

- chequing account, charges exempt, 123(1)"financial service"(b)
- clearing, see Clearing and settlement services
- constitutes money, 123(1)"money"
- dishonoured
- • penalty for, 280.3; Financial Administration Act s. 155.1(2)(a); TIB B-100; Memo 16-2 para. 38
- • restarts 10-year collection limitation, 313(2.4)(c)
- post-dated, Memo 300-6-2 para. 9
- settlement, see Clearing and settlement services

Chess tournament, see Competitive event

Chest wall oscillation system

· zero-rated as medical device, VI-II-6

Chewing gum, taxable, VI-III-1(e); Memo 4-3 para. 45

Chickens, zero-rated, VI-IV-1; Memo 4-4 para. 5

Child

- · camp, see Camp
- · care, see Child care
- dependent, of Canadian diplomat or Canadian Forces member, deemed resident in Canada, 132(1)(d)
- unaccompanied, see Unaccompanied child

Child care, Memo 21-1

- day camp for children 14 and under, V-VI-12(a)
- day care for children under 14, exempt, V-IV-1
- homemaker service, where supplied or paid for by government or municipality, exempt, V-II-13
- institutional care, exempt, V-IV-2

Child care (cont'd)

- nursing or residential care, exempt, V-II-1"health care facility", V-II-2
- payments to child care agency exempt, Policy P-017
- · unaccompanied child during travel, see Unaccompanied child

Children's car seat

- defined, Deduction for Provincial Rebate (GST/HST) Regulations s. 1
- point of sale rebate, Deduction for Provincial Rebate (GST/HST) Regulations:
- • British Columbia, Sch. 4, s. 9 [repealed]
- • Ontario, Sch. 1, s. 9

Children's clothing

- defined, *Deduction for Provincial Rebate (GST/HST)* Regulations s. 1
- point of sale rebate, Deduction for Provincial Rebate (GST/HST) Regulations:
- • British Columbia, Sch. 4, s. 1 [repealed]
- • Nova Scotia, Sch. 2, s. 5
- • Ontario, Sch. 1, s. 5
- • Prince Edward Island, Sch. 4.1, s. 5

Children's diaper

- defined, Deduction for Provincial Rebate (GST/HST) Regulations s. 1
- point of sale rebate, Deduction for Provincial Rebate (GST/HST) Regulations:
- • British Columbia, Sch. 4, s. 7 [repealed]
- • Nova Scotia, Sch. 2, s. 7
- • Ontario, Sch. 1, s. 7

Children's footwear

- defined, *Deduction for Provincial Rebate (GST/HST)* Regulations s. 1
- point of sale rebate, *Deduction for Provincial Rebate* (GST/HST) Regulations:
- • British Columbia, Sch. 4, s. 6 [repealed]
- • Nova Scotia, Sch. 2, s. 6
- • Ontario, Sch. 1, s. 6
- • Prince Edward Island, Sch. 4.1, s. 6

Chips, including potato and corn chips, taxable, VI-III-1(e); Memo 4-3 paras. 55–58

• chocolate, zero-rated, Memo 4-3 para. 46

Chiropodic services

- exemption for, V-II-7(d)
- practitioner of, V-II-1"practitioner"

Chiropractic services

- exemption for, V-II-7(b)
- practitioner of, V-II-1"practitioner"

Chocolate

- bars sold for fund-raising purposes, exempt, V-VI-4
- chips, zero-rated, Memo 4-3 para. 46
- coated fruits, seeds, nuts and popcorn, taxable, VI-III-1(e); Memo 4-3 paras. 45–54
- fondue, Memo 4-3 paras. 48-49
- taxable, VI-III-1(e); Memo 4-3 paras. 45-54

Choosing to register, see Registration (for GST/HST): voluntary

Christmas 2024-25 GST holiday, VI-XI

Chronic care

- provided at health care facility, V-II-1"health care facility"
- supplier, rebate to, 259(1)"facility supply"(a)(iii)

Church, see Charity

Cigarettes and cigars, see Tobacco

Circus, see Place of amusement

Citizenship certificate, supply of, exempt, V-VI-20(d)

City, see Municipality

Civil Air Navigation Services Commercialization Act, see Air navigation services

Civil Code, see Quebec, special rules

Civil penalties, 283, 284; Memo 16-2

Claim period

- for multi-employer pension plan rebate, defined, 261.01(1);
 TIB B-XX4
- for printed books rebate, defined, 259.1(1)
- for public service body rebates, defined, 259(1)

Claim under insurance policy, see Insurance: claim

Claimant

• defined, Non-Resident Rebate (GST/HST) Regulations s. 2

Classes, see Educational services

Cleaning service

- homemaker service, where supplied or paid for by government or municipality, exempt, V-II-13
- tangible personal property, place of supply for HST
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 29

Clearance certificate, 270

Clearing and settlement services

- included in financial services, 123(1)"financial service"(m); Financial Services and Financial Institutions (GST/HST) Regulations s. 3; Department of Finance news release 91-113
- no intragroup exemption where resupplied to third party, 150(2)(c)

Client confidentiality, see Solicitor-client privilege

Clocks and watches

• excise tax on, I-5(a); Memo 800-1

Closely related

- corporations, defined, 128; Closely Related Corporations (GST/HST) Regulations; Memo 14-7
- extended meaning on non-taxable importation for export distribution centre, VII-8.3
- group
- bad debt on account receivable purchased from another member, 231(2)
- • defined, 123(1)"closely related group"; Memo 14-7; Memo 17-14 paras. 3–6
- • election for exempt supplies, 150
- ••• effect of election, 151, 205(1)–(2), 205(3)
- • election for supplies at nil consideration, 156; Memo 14-5
- • joint filing, 228(7); Offset of Taxes (GST/HST) Regulations
- • set-off of refund against tax owing, 228(7); Offset of Taxes (GST/HST) Regulations
- • specified member, defined, 156(1); Memo 14-5 paras. 4-6
- partnerships, 156(1.1), (1.2); Memo 14-8

Closely related (cont'd)

• specified partnership, 156(1.1)

Clothes dryer

 in residential complex, exempt, V-I-13.3; Memo 19-2-2 paras. 23-24

Clothing

- children's, provincial point-of-sale rebate, *see* Children's clothing
- designed for disabled person, zero-rated, VI-II-36; Memo 4-2 paras. 52, 53
- · for charitable purposes
- • no GST on importation, VII-1
- • no HST on bringing into participating province, X-I-5

Club, see also Association; Membership

- · dining, recreational or sporting facilities
- • excluded from exemption for memberships, V-VI-17
- • no input tax credit, 170(1)(a); Memo 8-2 paras. 2-7
- • no public service body rebate, *Public Service Body Rebate* (*GST/HST*) Regulations s. 4(1)(f); TIB B-025
- • right to acquire membership, no input tax credit, 170(1)(a); Memo 8-2 paras. 2–7

Coal

• included in definition of mineral, 123(1)"mineral"

Cod liver oil

• taxable, Memo 4-3 para. 150

Coffee

- beans
- • chocolate-covered, taxable, VI-III-1(e); Memo 4-3 para. 45
- • zero-rated, VI-III-1; Memo 4-3 para. 5
- cake, whether taxable, VI-III-1(m); Memo 4-3 para. 93
- dispensed, taxable, VI-III-1(0.4); Memo 4-3 para. 120
- hot, taxable, VI-III-1(o); Memo 4-3 paras. 101-103
- shop, food at taxable, VI-III-1(q); Memo 4-3 paras. 136-139
- vending machine, sold from, taxable, VI-III-1(p); Memo 4-3 paras. 134–135

Coffin, see Funeral services (prepaid)

Coin, see also Specified tangible personal property

- constitutes specified tangible personal property, 123(1)"specified tangible personal property"(e)
- held for numismatic value, not money, 123(1)"money"
- · phasing out of the penny, Info Sheet GI-131
- worth more than face value, not money, 123(1)"money"

Coin-operated device

- · calculation of tax
- • single-coin device, 165.1(2)
- • telephone, 165.1(1)
- food sold through school cafeteria vending machine not exempt, V-III-12; Memo 20-5
- food sold through vending machine taxable, VI-III-1(p); Memo 4-3 paras. 134–135
- laundry machine in residential complex, exempt, V-I-13.3; Memo 19-2-2 paras. 23–24
- timing of tax liability and collection, 160; Memo 300-6-10

Coin-operated telephone, calculation of tax, 165.1(1)

Coke, see Carbonated beverages; Drugs

Cold cuts, platters, prepared

• taxable, VI-III-1(0.3); Memo 4-3 paras. 114-118

Colins

• zero-rated, VI-IV-1; Memo 4-4 para. 5

Collar, see Cervical collar

Collecting body

- defined, 177.1(2)
- no tax on supply to eligible author, eligible maker, eligible performer or collective society, 177.1(3)

Collecting information

excluded from exempt financial services, 123(1)"financial service"(r.4)(i)

Collection of garbage, exempt, V-VI-20(h)

Collection of tax, see also Administration and enforcement

- added to net tax, 225(1)
- amounts collected held in trust, 222
- amounts owing are debts due to Her Majesty, 313(1.1)
- before assessment, 315, 322.1
- by CRA (enforcement), 313–325
- • limitation period, 10 years, 313(2.1)–(2.8)
- certificate to enforce, see Certificate
- collection and enforcement activities, Memo 500-3-3
- deemed (requiring tax to be remitted), see also Deemed supplies
- • appropriation of property as capital property, 196.1
- • appropriation of property for personal use, 172(1)(b)
- • becoming a non-registrant, 171(3)(a)(ii)
- by licensed manufacturer or wholesaler where specified property supplied after 1990 and paid for before September 1990, 337(7)
- by supplier where residential property transferred pursuant to agreement made before October 14, 1989, 336(2)(g), (3)(g), (4)(g)
- • ceasing to use capital property primarily in commercial activities, 200(2)(b)
- • ceasing to use passenger vehicle or aircraft exclusively in commercial activities, 203(2)(b)
- • conversion of non-capital property to capital property, 196.1
- non-substantial renovation of residential complex, 192(b); Memo 19-2-3 paras. 68–76
- provision of benefit to shareholder, partner, member, etc., 172(2)(b)
- • receipt of supplier's rebate, 181.1(e); Memo 300-7-6
- • reduced use of capital real property in commercial activities, 206(4)(b), (5)(b), 207(1)(b), (2)(b)
- • self-supply by builder of residential property, 191(1)–(4)
- when an amount is forfeited to a registrant, 182
- when property transferred to insurer in settlement of a claim is used, 184(3)(a)
- when public service body elects in respect of real property, 211(2)
- when real property appropriated by individual for personal use, 190(2)(d)
- • when seized property is used, 183(4)(a), 183(5)(b)(i), 183(6)(b)
- where sale of real property incorrectly stated to be exempt, 194(b)

Collection of tax (cont'd)

- disclosure of tax by supplier, 223; Memo 3-1 paras. 43–46; Policy P-116, P-118R
- garnishment, 317
- merging of administration with income tax, 123(1)"Agency" (Analysis); Revenue Canada news release 92-53
- · obligation of supplier
- exception for emission allowance, 221(2.1)
- • exceptions for certain real property, 221(2)
- • general, 221(1)
- Her Majesty in right of a province, 122(b); TIB B-006; Memo 18-2 paras. 10–13
- • Her Majesty in right of Canada, 122(a); TIB B-036
- person leaving Canada or about to leave Canada, 322(1)
- remittance of tax collected, 228(2)
- requirement to disclose information, 289(1)
- right of supplier to sue for tax remitted, 224
- search warrant, 290
- · security, 314
- where invoice silent as to GST, Policy P-116, P-118R

Collective society

- defined, 177.1(1)
- no tax on supply to eligible author, eligible maker or eligible performer, 177.1(3)

College, see Public college; University

Colostomy appliance, zero-rated, VI-II-25, 26; Memo 4-2 paras. 43, 44

Combined supply, see also Incidental supply

- calculation of tax on total consideration, 165.2(1)
- consideration for multiple supplies must be allocated reasonably, 153(2), 167(1)(a)
- covering or container deemed part of main supply, 137
- exempt multiple unit residential complex deemed separate from addition, 136(3)
- · financial service and other service, 139
- groceries and other products, Memo 4-3 paras. 163-167
- incidental supply deemed part of primary supply, 138; Policy P-159R1, P-160R
- residential complex and other real property, deemed separate supplies, 136(2), 141(5)
- sale of gold and service of making jewellery, Policy P-192 (obsolete)
- timing of tax liability, rules, 168(8); Memo 300-6-16
- whether single supply or multiple supply, Policy P-077R2

Commercial activity, see also Business; Change in use of capital property; Use: in commercial activity

- activity related to or in furtherance of, 141(5), 185, 198
- defined
- • for FST inventory rebate, 120(1)
- for GST purposes, 123(1); Memo 2-1 para. 17; Policy P-176R
- · exclusive use where all or substantially all, 141
- goods for use in, no HST, X-I-22
- intangible property for use in, no HST, X-II-1
- intended vs. actual use in, 196
- method of determining percentage use in, 141, 141.01(5);
 Memo 8-3 paras. 33-49; Memo 700-5-1
- • financial institution, 141.02

- non-financial institution, financial services relating to, 185, 198
- · partnership, of
- • corporate partner that is registered, 272.1(2)(b)
- • general rule, 272.1(1)
- person engaged in, registration required, 240(1); Memo 2-1
- · property deemed not used in
- • real property of individual, 207(1)(b)
- specified tangible personal property exceeding prescribed amount, 176(5) [repealed]
- · property deemed used in
- • capital personal property, 199(2)
- • improvement to capital personal property, 199(4)
- • improvement to real property of public sector body, 209(1)
- • musical instrument, 199(5)
- • property relating to shares in subsidiary, 186(1); Policy P-
- • real property of public sector body, 209(1)
- reasonable expectation of profit required, Policy P-176R
- required for input tax credits, 169(1), (2)
- service for use in, no HST, X-II-1
- · supply deemed made in course of
- • certain supplies by governments, 146
- • sale of property of municipality or designated municipality, 141.2
- supply by insurer of property acquired on settlement of claim, 184(2)
- • supply relating to corporate takeover, 186(2)
- · supply deemed not made in course of
- • property used in making exempt supplies, 141.1(1)(b)
- use by court of seized or repossessed property, 183(3); Policy P-226
- termination of, things done deemed in course of commercial activity, 141.1(3)
- use in, 90% or more deemed to be 100%, 123(1)"exclusive", 141(1)–(4)

Commercial goods

- brokerage of, whether HST applies to brokerage services, New Harmonized Value-added Tax System Regulations s. 25(1)(a)
- defined, 212.1(1); Fees in Respect of Mail Regulations s. 2
- importation of, HST on, 220.07; TIB B-081, B-XX5
- no HST at border, 212.1(3)

Commercial lease, see Lease (or license): real property

Commercial real property, see also Real property

- deemed supplies, Memo 19-4-2
- sales and rentals, Memo 19-4-1

Commercial samples

- no GST on importation, VII-1
- no HST on bringing into participating province, X-I-7, 8(b)

Commercial service

- defined, 123(1); Policy P-151
- exporter of, see Inward processing
- · registrant performing on goods of unregistered non-resident
- • drop-shipment rule applies, 179(1)(a)(iii)
- • ITC to registrant for GST paid on importation
- • where paid by non-resident, 180
- • where paid by registrant, 169(2)

Commercial trust

 excluded from exemption re sale of vacant land, 123(1)"personal trust", V-I-9(2)

Commission

- fees of, exempt, 189.1, V-VI-20(g)
- fire, see Fire commission, may apply to be municipality
- hydro-electric, see Para-municipal organization
- planning, see Para-municipal organization
- · police, see Police: commission
- real estate agent, see Real estate agent: commission
- sales or purchasing representative for non-resident, zero-rated, VI-V-5; Memo 4-5-3 paras. 37–38
- securities, filing fees exempt, V-VI-20(g)
- trailer, mutual fund sales, Policy P-119
- travel agent, see Travel agent

Commissioner, see also Deputy Minister

- application for extension of time to object, to be sent to, 303(3)
- defined, 123(1)
- may exercise powers and perform duties of Minister, 275(1)
- specific powers re solicitor-client privilege, 293(6), (7)

Committee (to manage person's assets), see Receiver

Commode chair, zero-rated, VI-II-20; Memo 4-2 para. 22

Commodities, contract or option

issue of constitutes financial service, 123(1)"financial instrument"(f), 123(1)"financial service"(d); Memo 17-1 paras.
 37-39

Common carrier, see Carrier

Common expenses, exempt

- cooperative housing corporation, V-I-13.1; Memo 19-2-2 para.
 21; Memo 19-2-4 para.
- residential condominiums, V-I-13; Memo 19-2-2 para. 21

Common-law partner, see also Spouse

- defined, 123(1)
- transfer of property to, 325(1), (4)

Communal religious organization

• excluded from self-supply rules, 191(6.1)

Communication device

- for the disabled, VI-II-2; Memo 4-2 para. 1
- for use with telephone by hearing-impaired, zero-rated, VI-II-2 [repealed]

Communication of information (by CRA), 295

- appeal of order or direction, 295(7)–(9)
- authorized person, defined, 295(1)
- copy of document may be given to person from whom taken, 295(6)
- crimes, to police, 295(5.04)
- municipal rebate information, permitted, 259(13)
- offence, fine and imprisonment, 328
- official, defined, 295(1)
- permission to communicate information, 295(5)
- prohibition against communicating information, 295(2), (3)

Community centre, see Para-municipal organization

Companies' Creditors Arrangement Act

· debt forgiven under, treated as bad debt, Policy P-084R

Company, see Corporation

Compensation for claim

• investigating and recommending, constitutes financial service, 123(1)"financial service"(j)

Competitive event

- amateur, spectator fees exempt, V-VI-11
- contributions by competitors, 188(3), (4)
- prizes, deemed not a supply, 188(2)
- · prizes won outside Canada or participating provinces
- • no GST on importation, VII-2
- no HST on bringing into participating province, X-I-11

Complaint, see Information

Completed supply, timing of liability, for tax, 168(3); Memo

Completion, percentage of, for FST new housing rebate, Policy P-087

Compliance, see also Penalties

- by unincorporated bodies, 324
- penalties, 326-330
- proof of (or of failure of), 335(3), (4)
- with garnishment order, 317(7)
- with officials carrying out duties, 291(2)
- with request for foreign-based information, 292(8)
- with requirements re solicitor-client privilege, 293(16)

Compliance order

- after commission of offence, 326(2)
- for cooperation with audit or demand, 289.1
- • time contesting, not to count for reassessment clock, 289.2

Composite amount, see also Combined supply

• defined, for meals and entertainment costs, 236(1)(a)

Composite property (book with CD or DVD)

- defined, Deduction for Provincial Rebate (GST/HST) Regulations, s. 1; TIB B-094
- no HST on, Deduction for Provincial Rebate (GST/HST) Regulations, Schedule; TIB B-094

Compost

· not zero-rated as fertilizer, VI-IV-5

Compound interest at prescribed rate, 124; Interest Rates (Excise Tax Act) Regulations; TIB B-020

Compressor

• zero-rated as medical device, VI-II-5.2; Memo 4-2 para. 10

Computer

- communication via, see Telecommunication service
- memory boards removed from, no FST inventory rebate, Policy P-127
- · records on, see Books and records: computerized
- related service, see Computer-related service
- · sales made by, see Internet sales
- software, see Software
- support service, storage or data transfer provided by, place of supply for HST

Computer (cont'd)

• • after April 2010, New Harmonized Value-added Tax System Regulations s. 32

Computer carrier media

• defined, Federal Sales Tax Inventory Rebate Regulations s. 2

Computer-related service

- · defined, for HST place of supply rules
- after April 2010, New Harmonized Value-added Tax System Regulations s. 2
- · place of supply of, for HST
- after April 2010, New Harmonized Value-added Tax System Regulations s. 32

Computerized records, see Books and records: computerized

Concern in the nature of trade, see Adventure in the nature of trade

Concert

- amateur, exempt, V-VI-11
- charity or political party, V-V.1-2, V-VI-2(m)(iii), V-VI-3, 18
- HST on admission, where sold before October 24/96, 356(5); TIB B-077

Condiments

• zero-rated, VI-III-1; Memo 4-3 para. 119

Conditional sales agreement, see Instalment contract

Condominium

- apartment building converted to, V-I-4(a)
- common expense fees, exempt, V-I-13; Memo 19-2-2 para. 21
- complex, see Condominium complex
- fees, exempt, V-I-13; Memo 19-2-2 para. 21
- limited partnership for construction of, transitional rule, 336(5)
- • reduction in FST new housing rebate, *Federal Sales Tax New Housing Rebate Regulations* s. 3(b)(iii)(A)
- · parking space
- • lease of, whether exempt, V-I-8.1(b); Memo 19-2-2 paras. 18–20
- • sale of, whether exempt, V-I-8; Memo 19-2-1 paras. 47-48
- registration of, effect on timing of tax liability, 168(5)(a), 191(2)
- reserve fund contributions, 123(1)"supply" (Analysis)
- · residential condominium unit
- • builder of, defined, 123(1)"builder"(a)(ii), (d)(i)
- • built on leased land, rebate, 254.1(2)(a); Memo 19-3-2 para.
- • defined, 123(1)
- excluded from definition of single unit residential complex, 123(1)
- • new housing rebate
- • Ontario, New Harmonized Value-added Tax System Regulations, No. 2, s. 41
- ••• Nova Scotia, 254(2.01)–(2.1); Memo 19-3-8 paras. 9–12
- owner-built, new housing rebate, 256(2)(a); Memo 19-3-4 para. 4
- • FST (transitional), 121(3)(b)
- • HST (Ontario), New Harmonized Value-added Tax System Regulations, No. 2, s. 46
- ••• GST, 254(2); Memo 19-3-1
- parking space supplied with, V-I-8; Memo 19-2-1 paras.
 47–48

- sale exempt where previously taxed, V-I-4; Memo 19-2-1 paras. 35–37
- • self-supply rules, 191(1), (2)
- • timing of liability on sale of, 168(5)(a)
- transitional rule, where agreement made before October 14, 1989, 336(3)
- · resort, see Vacation properties

Condominium complex

- builder of, defined, 123(1)"builder"(a)(iii), (d)(i)
- construction or substantial renovation deemed substantially completed, 191(9)
- conversion of apartment building to, V-I-4(a); Memo 19-2-1 paras. 35–36
- defined, 123(1); Memo 19-2 para. 6
- excluded from definition of multiple unit residential complex, 123(1)
- Harmonized sales tax (HST), transitional rules, 351(5), (6);
 TIB B-077
- · limited partnership for construction of
- • transitional rule for GST, 336(5)
- • transitional rule for HST, 351(7); TIB B-077
- · residential condominium unit
- • Harmonized sales tax (HST), transitional rules, 351(3), (4), (7); TIB B-077
- • new housing rebate
- • FST (transitional), 121(3)(b)
- • GST, 254(2); Memo 19-3-1
- • Nova Scotia, 254(2.01)–(2.1); Memo 19-3-8
- ••• owner-built, 256(2)(a); Memo 19-3-4 para. 4
- transitional rule, where agreement made before October 13, 1989, 336(4)

Conduit, see Continuous supply (electricity, gas, etc.)

Confectionery, taxable, VI-III-1(e); Memo 4-3 paras. 45-54

Conference

- · admission to
- • by charity, exempt, V-V.1-1
- • by public institution, taxable, V-VI-2(m)
- food supplied for, to school, college or university, not exempt, V-III-14; Memo 20-5

Confidential information

- in hands of lawyer, solicitor-client privilege, 293
- in hands of CRA, 295, see also Communication of information

Conservation authority, see also Para-municipal organization

• determination as municipality, 123(1)"municipality"

Consideration

- allocation among multiple supplies, 153(2), 167(1)(a)
- · amount deemed included
- • reimbursement of disbursements, former 178
- • return of returnable container, 176(1); TIB B-002, B-038; Memo 400-3-6
- amount deemed not to be
- • competitor's contribution to prize fund, 188(3)
- • deposit, 168(9)
- • donation portion of amount paid to charity or public institution, 164

Consideration (cont'd)

- paid for certain resource royalties, 162(1); Policy P-105R, P-110R
- • reimbursement of disbursements incurred as agent, former 178
- defined, 123(1), 153, 154; Public Service Body Rebate (GST/HST) Regulations s. 2; Streamlined Accounting (GST/HST) Regulations s. 2(1); Memo 19-1 paras. 51–58
- disbursements, whether included, Policy P-209R
- election for supplies within corporate group to be at nil, 156;
 Memo 14-5
- excludes nominal consideration for purposes of determining ITCs, 141.01(1.1), 141.02(2); Memo 8-3 para. 21
- expressed in foreign currency, 159; Memo 3-6
- fraction (100/107), 123(1)"consideration fraction"
- nominal, see Nominal consideration, supply for
- value of, 153, 154; Memo 300-7
- importation of intangible property and services from branch outside Canada, 220; TIB B-095
- includes/excludes certain other taxes, 154; Taxes, Duties and Fees (GST/HST) Regulations; TIB B-029
- • real property, Memo 19-1 paras. 51-58
- • sale-leaseback arrangement, 153(4.1)–(4.6)
- • supply under resource farm-out agreement, 162(4)(c)
- • when bet placed, 187
- • when coupon or voucher used, 181
- • when gift certificate used, 181.2; Policy P-202
- • when income tax refund discounted, 158; Memo 500-5-5
- • when paid in foreign currency, 159; Memo 3-6
- • when property contributed to a trust, 268(b)
- • when property distributed by trust, 269
- • when property seized to satisfy a debt, 183(1)
- when property transferred on settlement of insurance claim, 184(1)
- when due, 152
- • employee benefits, 173(2)(a)
- • instalment sales, transitional rule, 118(3)(b)
- • shareholder appropriations, 173(2)(b)
- · when paid
- • coin-operated device, 160(a)(ii)
- · when received
- • coin-operated device, 160(b)(ii)

Consigned goods, Info Sheet GI-009

Consignee

• meaning of, Memo 28-2 para. 5

Consignment sale, Info Sheet GI-009

- return of imported goods on, 215.1(1)
- supply by undisclosed agent, 177(1) [repealed], 177(1.1) [repealed]
- timing of tax liability, 168(3)(b); Memo 300-6-9, Memo 300-6-11

Consistency

- required in choice of taxation year of a business, 123(1)"taxation year"
- required in method for determining use in commercial activities, 141.01(5), 141.02(16); Memo 8-3 para. 38; Memo 700-5-1 paras. 23-24

Consolidated filing, *see* Set-off: of refund or rebate against tax of another person

Consolidated filing election

• for investment plans, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 54; Notice 260

Conspiracy, see Offences

Construction

- bond
- constitutes insurance policy, 123(1)"insurance policy"(c); Memo 17-1 para. 12(c)
- • GST treatment of, 184.1; Policy P-210R
- • meaning of, Memo 17-1 paras. 17-21
- • surety under, 184.1(2); Policy P-210R
- • direct inputs, 184.1(2)(c), (d)
- • limitation on input tax credits, 184.1(2)(b)–(d); 184.1(3)
- • whether completion of contract is commercial activity, 184.1(2)(b), (c)
- bridge or tunnel, international, supplies for, zero-rated, VI-VIII-2
- builder, defined, 123(1)
- building materials, FST rebate, 120(1)"inventory"(b)
- contract
- holdbacks, not taxed, 168(7); Memo 300-6-14; Memo 19-1 paras. 81–84
- · · progress payments
- ••• timing of liability, 168(2); Memo 19-1 paras. 72-80
- • provincial sales tax included in price, TIB B-053
- • timing of tax liability, 168(3); Memo 300-6-13
- • versus sale of real property, Memo 19-1 paras. 92–97
- equipment
- • supplies by auction, election, 177(1.3); Property Supplied by Auction (GST/HST) Regulations s. 1(d)
- floating home, timing rule, 190.1(1)
- joint venture election, 273; Joint Venture (GST/HST) Regulations; TIB B-021
- major addition to single unit residential complex, Memo 19-3-7 paras. 4–9; Policy P-153 (obsolete)
- mobile home, timing rule, 190.1(1)
- · new housing
- • FST transitional rebate, 121
- • HST rebate (Ontario), New Harmonized Value-added Tax System Regulations, No. 2, s. 40–47
- • GST rebate, 254–256, 256.2; Memo 19-3
- Northumberland Strait Crossing, no HST, 362
- performance bond, see Construction: bond
- self-supply rules, 190, 191
- single unit residential complex, Memo 19-3-7 paras. 4–9; Policy P-153 (obsolete)

Constructive importer

- agreement to treat supply of goods as made in Canada, 178.8(3)–(4)
- lease of goods, imported taxable supply, 217"imported taxable supply"(b.11)
- defined, 178.8(2)
- input tax credit available to, 178.8(2)

Consular officials, see Diplomats

Consulting or consultative service

- meaning of, Memo 4-5-3 para. 9-10; Policy P-173
- · provided by medical practitioner, exempt, V-II-5
- · provided to non-resident
- made outside Canada, 142(2)(g)
- • zero-rated, VI-V-9, VI-V-23; Memo 4-5-3 paras. 51–54, 87–90

Consumer

- defined, 123(1); Memo 27-3 para. 10
- drugs sold to without prescription, not zero-rated, VI-I-2(b),
- foods packaged for sale to, whether zero-rated, VI-III-1(m), (n), (q); Memo 4-3 paras. 95–97, 136
- prepaid supply of motor vehicle or specified property to, transitional rule, 337(7), (8)
- supply of certain resource rights to, 146(c)(i), 162(2)(a), V-VI-20(k)
- supply of heart monitoring device for use by, VI-II-3; Memo 4-2 paras. 2, 3
- supply of right to hunt or fish, 146(b), V-VI-20(j)

Consumers' recycler

• defined, for returnable containers, 226(1)

Contact information

- defined, re disclosure of confidential information, 295(1)
- disclosure of, 295(5)(j)

Contact lenses, zero-rated, VI-II-9; Memo 4-2 para. 15

Containers and coverings

- bottles, see Returnable container
- brought into an HST province, no HST, X-I-8(d), X-I-16
- · cargo container, see Cargo container
- charity operating bottle depot, 226.1 [repealed]
- deemed part of main supply, 137
- deposit on, 168(9), 176(1); TIB B-002, B-038; Memo 400-3-6
- fertilizer, 25kg or more, zero-rated, VI-IV-5; Memo 4-4 para.
 18
- imported, no GST, VII-9
- · returnable container, see Returnable containers

Contest, see Competitive event

Contiguous land

· whether part of residential complex, Policy P-069

Contingent amounts

• whether included in debt security, Policy P-170

Contingent fees

- · for legal services, transitional rules
- • GST, 341.1(1); Policy P-041 (obsolete)
- • HST, 357(2); TIB B-077

Continuation of corporation

- · in another jurisdiction
- • effect on residence in a province, 132.1(1)(a)
- • effect on residence in Canada, 132(1)(a)
- upon amalgamation, 271(b); Amalgamation and Windings-Up Continuation (GST/HST) Regulations; TIB B-007

Continuing education courses, exempt, V-III-6

Continuing plan

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 7(4)(b)

Continuous freight movement, *see also* Continuous outbound freight movement; Freight transportation service

- defined, VI-VII-1(1); Memo 28-2 paras. 6-7
- interline settlements, VI-VII-1(2); Policy P-157 (obsolete); Memo 28-2 paras. 44–62
- zero-rated, VI-VII-10, 11; Memo 28-2 paras. 44-62, 59, 70

Continuous journey, see also Passenger transportation service

- defined, VI-VII-1(1), IX-VI-1; Memo 28-3 paras. 2-4; New Harmonized Value-added Tax System Regulations s. 1
- when zero-rated, VI-VII-2, 3; Memo 28-3 paras. 26-27
- whether HST applies, New Harmonized Value-added Tax System Regulations s. 21; Memo 28-3 paras. 63–64

Continuous outbound freight movement, *see also* Continuous freight movement; Freight transportation service

- defined, VI-VII-1(1); Memo 28-2 para. 8
- where carrier had no knowledge goods not being exported, 221(3)
- zero-rated, VI-VII-7; Memo 28-2 paras. 65–66, 97

Continuous supply (electricity, gas, etc.), see also Budget payment arrangement (equal billing plan)

- electricity, gas, steam and telecommunications taxable between municipal entities, V-VI-28(f)
- timing of tax liability, 168(4); Memo 300-6-6

Continuous transmission commodity, see also Natural gas

- defined, 123(1)
- imported taxable supply of, 217"imported taxable supply"(b.2), (b.3)
- in transit, deemed not imported/exported, 144.01
- where not exported, addition to net tax, 236.1
- zero-rated, VI-V-15.1, 15.2

Contra interest, on instalment payments, 280(3); TIB B-100; Memo 16-2 paras. 14–18

Contra transaction, see Barter

Contract, see also Agreement

- damages for breach of, 182; Policy P-218R
- maintenance, see Maintenance: contract
- payments made to surety under performance bond, 184.1(2)(a);
 Policy P-210R
- place of, effect on whether business carried on in Canada, Memo 2-5; Policy P-051R2
- · suing for unpaid GST, 224
- who bears the GST when contract silent, Policy P-116, P-118R

Contract to provide information to CRA, *see* Informant payments (for leads on international tax evasion)

Contractor, see also Employee(s)

 residence for at remote work site, exception to self-supply, 191(7)(b)(i)(B); Memo 19-2-3 paras. 51-58

Contribution

- by competitors to prizes in an event, 188(3), (4)
- by corporate directors liable for tax not remitted, 323(8)
- to charity or political party, as part of consideration for supply, V-V.1-2, V-VI-3, 18

Controlled corporation, see Associated persons

Controlled Drugs and Substances Act

· drugs zero-rated, VI-I-2

Convention, Memo 27-2, *see also* Convention facility; Organizer (of convention); Sponsor (of convention)

- defined, 123(1); Memo 27-2 paras. 1-16
- · domestic
- rebate to non-resident exhibitor, 252.3; Memo 27-2 paras. 106–124; Info Sheet GI-028
- • supply to non-resident delegate, non-taxable, 167.2(1); Memo 27-2 paras. 98–100
- supply to non-resident exhibitor, non-taxable, 167.2(2); Memo 27-2 paras. 101–105
- foreign, Memo 1-5, 27-2; TIB B-071; Policy P-095
- • admissions, no tax, 189.2(a); Memo 27-2 paras. 48, 53-54
- • defined, 123(1); Policy P-095; Memo 27-2 paras. 28-36
- determining percentage of expected non-residents, Policy P-095; Memo 27-2 para. 32
- • exhibition space charges, no tax, 189.2(b); Memo 27-2 paras. 48–54
- • organizer
- • defined, 123(1); Memo 27-2 paras. 37-47
- ••• rebate credited to sponsor, 252.4(2); Memo 27-2 paras. 72–93; Info Sheet GI-031
- • rebate to, 252.4(3); Memo 27-2 paras. 64–71; Info Sheet GI-030
- • rebate of GST/HST, 252.4; Memo 27-2 paras. 55-93
- remission of tax relating to, Foreign Organizations Remission Order, 1983
- sponsor
- • certain supplies by, no tax, 189.2; Memo 27-2 paras. 48–54
- ••• defined, 123(1); Memo 27-2 paras. 18-25
- ••• rebate to, 252.4(1); Info Sheet GI-029; Memo 27-2 paras. 55-63
- · goods or services for use at
- excluded from Ontario/BC HST ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 28(2)(b)
- • no GST on importation, VII-1
- • no HST on bringing into participating province, X-I-7

Convention facility

• defined, 123(1)

Conversion, see also Change in use of capital property

- of FST-exempt goods to non-exempt use, no FST, 118(6.1)
- of multiple unit residential complex to condominium complex, V-I-4(a); Memo 19-2-1 paras. 35–36
- of new home to rental property (self-supply rule), 191(1)
- of non-capital property to capital property, 196.1
- of real property to residential use, 190(1); Memo 19-2-3 paras. 80–84
- · of vehicle for use by disabled
- • lease of vehicle, reduced tax, 258.1(7); Info Sheet GI-199
- rebate on importation of vehicle, 258.1(6), 258.2; Info Sheet GI-199
- • rebate on purchase of vehicle, 258.1(2)–(5); Info Sheet GI-199
- • service zero-rated, VI-II-18.1; Memo 4-2 paras. 27, 28

Conveyance

- emergency repair of for non-resident, zero-rated, VI-V-6; Memo 4-5-3 paras. 39–42, 45
- meaning of, Policy P-067R; Memo 4-5-3 para. 41
- no GST on importation, VII-1
- no HST on bringing into participating province, X-I-2, 3
- no tax on importation, VII-1
- temporary importation of, Policy P-024R

Conveyors (grain handling), zero-rated, VI-VI-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(f)(ii)

Conviction, see Offences

Cookies, taxable where packaged less than six, VI-III-1(m); Memo 4-3 paras. 87, 89, 93, 137

- dough, zero-rated, Memo 4-3 para. 94
- packaged with spreadable product, Memo 4-3 paras. 166–167

Cooperative

- advertising payment, Memo 300-7 para. 39, Memo 300-7-7
- · corporation
- • arranging for transfer of share, 123(1)"financial service"(r.1); Policy P-048
- • defined, 123(1)
- excluded from rule re supply of membership with security, 140
- housing corporation, Memo 19-2-4 paras. 1–10
- • defined, 123(1); Memo 19-2-1 para. 25
- • maintenance fees, exempt, V-I-13.1; Memo 19-2-2 para. 21
- • new housing rebate, 255; Memo 19-3-3
- • Nova Scotia, 255(2.01)–(2.1); Memo 19-3-8 paras. 15–16
- ••• Ontario, New Harmonized Value-added Tax System Regulations, No. 2, s. 45
- real estate agent's commission taxable, 123(1)"financial service"(r.1); Policy P-048
- sale of shares exempt, 123(1)"financial instrument"(b), "financial service"(d), V-VII-1
- • subsidized housing, self-supply calculation, 191.1
- patronage dividends, 233

Cooperative corporation, see Cooperative: corporation

Cooperative housing corporation, *see* Cooperative: housing corporation

Coordinator

• defined, Offset of Taxes (GST/HST) Regulations s. 2

Copying levy

 no tax on certain supplies by collecting body or collective society, 177.1

Copyright

- Act, see Copyright Act
- supplied to non-resident, zero-rated, 142(2)(c), VI-V-10; Memo 4-5-3 para. 106
- • used in business in Canada, 217"imported taxable supply"(c.1)
- work produced for export, rebate to non-resident for related GST, 252(2); Policy P-195R

Copyright Act levies

• no tax on certain supplies by collecting body or collective society, 177.1

Coral, articles made of

• excise tax on, I-5(b); Memo 800-1

Corn chips, taxable, VI-III-1(f); Memo 4-3 para. 55

Corporate information

- defined, re disclosure of confidential information, 295(1)
- disclosure of, 295(5)(j)

$\textbf{Corporate reorganization}, \textit{see} \ \textbf{Corporation: reorganization}$

Corporation

- amalgamation of, 271, see also Amalgamation
- as member of partnership, 272.1(2)(b)
- · associated, 127
- benefit conferred on shareholder, 170(1)(c)(iii), 172(2), 173(1);
 Memo 8-2 para. 20; Memo 9-1, 9-2
- · closely related group
- • defined, 123(1), 128; Closely Related Corporations (GST/HST) Regulations; Memo 14-7
- • election for exempt supplies, 150; Policy P-033
- • election for supplies at nil consideration, 156; Memo 14-5
- · condominium, see Condominium
- cooperative housing, see Cooperative
- credit card of, use of 6/106 or 14/114 factor for expenses, Policy P-184
- Crown, see Crown corporation
- defined, Interpretation Act s. 35(1)
- · directors
- • liability for unremitted tax, 323
- • participating in offence of the corporation, 330
- dissolution, see Winding up of corporation
- garnishment of amount to be advanced by, to person not dealing at arm's length, 317(2)(b)(ii)
- government-owned, see Crown corporation
- · holding, see Holding company
- member of partnership, voluntary registration, Policy P-216
- multi-tiered, 186(3); Memo 8-6 paras. 14-16; Policy P-137
- officers, directors and agents guilty of offences, 330
- partner of partnership, voluntary registration, Policy P-216
- raising of capital, input tax credit for expenses, 141.1(3), 185(1); Policy P-108
- registration of, Memo 2-1 para. 14(d)
- related, expenses relating to deemed for commercial activity, 186(1), (3); Memo 8-6; Policy P-137
- · reorganization
- • amalgamation, 271
- • butterfly, Policy P-045
- • input tax credit entitlement, 185, 186
- • sale of business, 167(1), (1.1), 167.1; Memo 14-4
- • transfers between closely related corporations, 150, 156
- • windup, 272
- residence of
- • in a province, 132.1(1)(a)
- • in Canada, 132(1)(a)
- • permanent establishment, effect of, 132(2), (3), 132.1(1)(d)
- supply of farmland to shareholder or related individual, exempt, V-I-12
- takeover costs, input tax credit, 186(2); Memo 8-6 paras. 17–26
- transactions with related non-resident persons, disclosure, 294

- who may sign documents, 279(a)
- winding-up of, see Winding-up of corporation
- without share capital, holder's right, 123(1)'financial instrument'(b.1)

Corporeal movable property, see Tangible personal property

Correspondence courses, see Educational services; Vocational school

Cosmetic

- defined, re medical devices, VI-II-1
- excluded from zero-rating of articles related to prosthesis or appliance, VI-II-26; Memo 4-2 para. 44
- purposes
- • medical and dental treatment not exempt, V-II-2, 5; Memo 300-4-2
- • service related to, not zero-rated, VI-II-34; Memo 4-2 para.

Cosmetic service supply

- · defined, V-II-1
- excluded from exemption for health care services, V-II-1.1
- excluded from exemption for supplies by public institutions, V-VI-2(p)
- excluded from zero-rating for medical devices, VI-II-1.2

Cost

• of tangible property, defined, *Streamlined Accounting* (GST/HST) Regulations s. 15(1)

Cost allocations

 intra-company, foreign-based insurance companies, Policy P-126

Cost of capital property

• meaning of, Policy P-060

Cost of resupply of seized property, Policy P-175

Cost-sharing

• in medical or dental practice, Policy P-238

Costs (legal)

- awarded against taxpayer, treated as debt owing, 313(4)
- GST added to award of, 224 (Analysis)
- not awarded on solicitor-client privilege application, 293(10)

Cottage, see also Vacation properties

- · sale of, exempt
- building, as used residential complex, V-I-2; Memo 19-2-1 paras. 20–28; Info Sheet GI-004
- land, as non-commercial property, V-I-9(2)(a); Memo 19-2-1 para. 24

Cough drops

• taxable, Memo 4-1 para. 10

Counselling

- physician services exempt, V-II-5
- psychologist services exempt, V-II-7(j)
- social worker services exempt, V-II-7.2

Country other than Canada

- currency of, transactions in, 159; Memo 3-6
- diplomats of, see Diplomats
- permanent establishment in, 132(2), (3)
- supply in course of operating ship or aircraft for government of, zero-rated, VI-V-2(b); Memo 4-5-2 paras. 21–23; Memo 4-5-3 paras. 27–31

Country other than Canada (cont'd)

• supply to, see Place of supply

County, see Municipality

Coupon

- acceptance of, 181(2)–(4)
- defined, 181(1)
- non-reimbursable, 181(3)
- redemption of, 181(5)
- reimbursable, 181(2)
- when tendered to retailer, 181; TIB B-002

Courier, see also Carrier; Freight transportation service

- constitutes delivery in a province, IX-II-3
- defined, 123(1), VII-7, IX-I-5
- export by, zero-rated, VI-V-12; Memo 4-5-2 paras. 39, 42
- goods delivered to Canada by
- supply by non-resident, whether deemed made in Canada, 143.1; Publications Supplied by a Non-resident Registrant (GST/HST) Regulations
- • whether tax on importation, VII-7, VII-7.1; Mail and Courier Imports (GST/HST) Regulations; Courier Imports Remission Order

Courses, see Educational services

Court, see also Judge; Tax Court of Canada

- · action, see Lawsuit
- appeal to, see Appeal
- authorization for collection action before end of reporting period, 322.1
- costs, see Costs (legal)
- filing fee, exempt, V-VI-20(b)
- litigation fees, see Litigation
- of appeal, defined, 295(1)
- order, see Compliance order
- seizure of property by, treatment of subsequent supply, 183(3); Policy P-226

Co-venturer, defined, 273(1)

Coverings, see Containers and coverings

Cows, zero-rated, VI-IV-1; Memo 4-4 para. 5

Crafts

• classes or activities involving, exemption for, V-VI-12

Credit

- card
- • expenses, use of 6/106 or 14/114 factor, Policy P-184
- fees from
- • causes person to be financial institution, 149(1)(c)
- • no input tax credits for, 185(1)(a)(i), 198(a)(i)
- · granting of
- • fees exceeding \$1 million, 149(1)(c)
- GST refundable, Income Tax Act s. 122.5
- input tax, 169, see also Input tax credit
- · note, see Credit note
- union, see Credit union

Credit card management service

 excluded from exempt financial services, 123(1)"financial service"(r.3) Credit note, see also Debit note

- defined, 123(1)
- recapture of input tax credit, 232(3)(c)
- repayment of rebate, 232(3)(d)
- to be issued for HST when budget payment arrangement straddling April 1/97 is reconciled, 353(3); TIB B-077
- to be issued when budget payment arrangement straddling 1990–91 is reconciled, 338(3)
- to be issued when tax adjusted by supplier, 232(3); Memo 12-2; TIB B-042
- • contents of, Credit Note and Debit Note Information (GST/HST) Regulations
- recording on GST return, Policy P-030R

Credit union, Memo 17-8, see also Financial institution

- deemed a registrant for determining whether closely related, 128(3)
- deemed part of closely related group with other credit unions, 123(1)"qualifying subsidiary"(b), 150(6)(a); Memo 17-8 paras. 30–33
- deemed to have made election for exempt supplies, 150(6); Memo 17-8 paras. 26–28; Memo 17-14 paras. 45–51
- defined, 123(1); Memo 17-8 paras. 1–13
- exclusion from rule re shares entitling holder to membership, 140
- financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 25
- garnishment of moneys owing by, 317(2)(a)
- listed financial institution, 149(1)(a)(iv)
- remittance over \$10,000 required to be made electronically through, 278(3)(b); Memo 7-5 para. 3
- seized or repossessed property, effect on small supplier threshold, Policy P-026

Creditor, see Secured creditor; Seizure of property

Cremation, see Funeral services (prepaid)

Criminal Code provisions overridden by minimum penalties, 331

Criminal offences, see Offences

Crippled foot or ankle, appliance made to order, zero-rated, VI-II-24; Memo 4-2 para. 40

Croissants

- sandwich made with, taxable, Memo 4-3 para. 112
- sweetened, taxable where packaged less than six, VI-III-1(m); Memo 4-3 paras. 87, 89, 94, 137
- unsweetened, zero-rated, VI-III-1(m); Memo 4-3 para. 88

Crops, when zero-rated, VI-IV-2

Cross-border loan, see Lending of money: to non-resident

Crossing

• defined (re Northumberland Strait Crossing), 362(1)

Crown corporation, see also Specified Crown agent

- rebate of GST paid, GST Federal Government Departments Remission Order
- subject to GST, 122; TIB B-012, B-036; Specified Crown Agents (GST/HST) Regulations

Crown debt

• assignment of, Assignment of Crown Debt Regulations

Crude oil, see also Continuous transmission commodity

• importation for refining, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(e)

Crutch

 for use by disabled individual, zero-rated, VI-II-27; Memo 4-2 para. 45

Cryptoasset, see also Virtual payment instrument

- defined, 188.2(1)
- mining of, deemed not commercial activity, 188.2(2), (3), (4);
 Notice 324
- • exception, 188.2(5)

Cryptocurrency, see Cryptoasset; Virtual payment instrument

Culpable conduct

- defined
- • for third-party penalty, 285.1(1)

Cultural foods, zero-rated, Memo 4-3 para. 146

Cumulative amount

• defined, for designated reporting periods, 238.1(1)

Curator (to manage person's assets), see Receiver

Curb sawing service, by municipality, exempt, V-VI-21; Policy P-177R

Currency

- exchange of, constitutes financial service, 123(1)"financial service"(a)
- foreign, determining value of consideration, 159; Memo 3-6
- not money where worth more than face value, 123(1)"money"

Custodial service

- meaning of, Memo 4-5-3 para. 71; Policy P-189
- securities or precious metals held for Canadian resident, 217"imported taxable supply"(a)(iv)
- securities or precious metals held for non-resident, services zero-rated, VI-V-17; Memo 4-5-3 paras. 70–71

Custodian, see also Custodial service

• of documents when solicitor-client privilege claimed, 293(1)

Custom software, TIB B-037R; Policy P-150

Customs brokerage services

- · place of supply for HST
- after April 2010, New Harmonized Value-added Tax System Regulations s. 25

Customer list

whether "produced", Policy P-242

Customer's good

- defined, for export distribution centres, 273.1(1)
- percentage total value added, 273.1(5)
- percentage value added attributable to non-basic services, 273.1(4)

Customs Act

- abatement or refund for damaged or defective goods, 215.1(2)(b)
- appeals under, on importation, 216
- calculation of GST on importations under, 214
- communication of information for purposes of, 295
- · definitions adopted from
- • "Canada", 123(3)
- • "goods", 123(1)

- • "release", 123(1)
- duty-free shop licensed under, see Duty-free shop
- · goods held in bond under
- • supply of, 144
- transportation of, VI-VII-1(1)"place outside Canada", VI-VII-6, 8, 9, 10
- highway sufferance warehouse, see Sufferance warehouse services, zero-rated
- import certificate number to be disclosed, 213.2(1)
- merging of administration with income tax and GST, 123(1)"Agency" (Analysis); Revenue Canada news release 92-53
- provisions applying to importation of goods, 214-216
- refund for damaged or defective goods, 215.1(2)(b)
- release of goods under, see Release
- security for payment of amount under, 213.1
- supply before release under, 144
- valuation of imported goods under, 215(1)

Customs Tariff

- communication of information relating to, 295(4), (5)(e)(ii)
- GST on imported goods treated as duty under, 214
- goods not subject to HST self-assessment, X-I-1, 4, 6, 16
- goods not subject to GST on importation, VII-1, 9
- rebate under, reduces input tax credit, 225(3)
- returning resident exemptions, VII-1, 1.2
- security for payment of amount under, 213.1
- valuation of goods, applies for GST on importation, 215(1)

Cut flowers, taxable, Memo 4-4 para. 2

Cutting vegetation, exempt, V-VI-21.1(c)

D

DPO, see Distribution platform operator

Daily compounding of interest, see Interest

Dairy products, whether zero-rated, VI-III-1(n), (o)(v); Memo 4-3 paras. 27, 30–32, 76, 120

Damage appraisals under insurance claims

 exempt, 123(1)"financial service"(j.1); Policy P-049; Info Sheet GI-134

Damage claim

- not under contract, not a supply, Policy P-218R
- under contract, GST treatment, 182

Damaged goods

• rebate after importation, 215.1(2)–(3)

Damages

• whether GST included in, 182; Policy P-218R

Dance

classes or activities involving, exemption for, V-VI-12

Danger of death or physical injury, communication of personal information allowed, 295(4.1)

Data communication, see Telecommunication service

Data warehousing

· characterization as service or intangible property, TIB B-090

Database management systems, *see* Books and records: computerized

Database subscription

• characterization as service or intangible property, TIB B-090

Dates, see Grandfathering dates

Day camp, exempt, V-IV-1, V-VI-12(a), *see also* Child care Day care

- seniors, exempt, V-IV-3
- · children, see Child care

Day school tuition, exempt, V-III-2; Memo 20-1

De minimis amounts

• under \$2, not payable or refundable, 297.1; TIB B-100

De minimis financial institution, 149(1)(b); Memo 17-7

- calculation, effect of election for nil consideration, Policy P-007
- exclusion of interest and dividends from related corporation, 149(4)
- exclusion of public service bodies, 149(4.1)
- inclusion of precious metal sales in denominator of calculation, 149(4.01)

Deadline for filing, see Limitation period; Return: required

De-alcoholized wine, taxable, Policy P-081R

Dealer, stocks and bonds, see Investment dealer

Dealing at arm's length, see Arm's length

Death

- cancellation of registration, 242(1); Memo 2-7 para. 3(b)
- certificate, supply of, exempt, V-VI-20(d)
- danger of, communication of personal information allowed, 295(4.1)
- · estate of deceased individual, see Estate
- executor continues in role of deceased, 267
- funeral services, see Funeral services (prepaid)
- Queen, of, Interpretation Act s. 46
- sale of land by estate, V-I-9
- supply of business assets to beneficiary, 167(2); Policy P-031; Memo 14-4 paras. 29–32
- transfer of assets to executor, no tax, 267

Debenture, see Bond

Debit note, see also Credit note

- authorization for recipient to issue, 232(3); Memo 12-2
- contents of, Credit Note and Debit Note Information (GST/HST) Regulations
- defined, 123(1)
- recapture of input tax credit, 232(3)(c)
- repayment of rebate, 232(3)(d)

Debt, see also Indebtedness

- bad, see Bad debts
- due to Her Majesty, 313, 316–319
- exclusions from exports of financial services, VI-IX-1(a)-(d)
- · forgiveness, see Forgiveness of debt
- reduced or extinguished on breach of agreement, 182(1)
- related corporation, of, ITC for expenses relating to, 186(1); Policy P-137
- · satisfaction of, transfer of property, Policy P-120
- · security, see Debt security
- seizure of property to satisfy, 183

 transfer of security interest, not a supply, 134; Policy P-115, P-120, P-122

Debt collection service

• taxable, 123(1)"financial service"(r.2)

Debt security

- constitutes financial instrument, 123(1)"financial instrument"(a)
- contingent amounts, whether included, Policy P-170
- defined, 123(1); Memo 17-1 paras. 5-9; Policy P-170
- person appointed under, constitutes receiver, 266(1) "receiver" (a)
- sale caused by exercise of right under, see Power of sale
- transfer by financial institution as principal, excluded from zero-rating of financial services to non-residents, VI-IX-1(e)

Deceased person, see also Death; Estate

• personal representative of, see Personal representative of deceased individual

Deceptive statements, see Offences

Declaration

 by shipper, for zero-rated freight transportation service, Memo 28-2 Appendix

Decrease in use in commercial activity, *see* Change in use of capital property

Dedicated telecommunications channel, see

Telecommunications channel

Deeds, heroic, medals and prizes awarded outside Canada or participating provinces

- no GST on importation, VII-2
- no HST on bringing into participating province, X-I-11

Deemed facts or circumstances

 effect on whether inputs used in commercial activities, 141.01(6); Memo 8-3 para. 31

Deemed residents

- of a province, 132.1
- of Canada, 132

Deemed supplies

- commercial real property, Memo 19-4-2
- list of, 123(1)"supply" (Related Provisions); Memo 3-1 paras. 81–103
- supplies deemed not to have been made, 141.01(7); Memo 8-3 para. 32

Deer, zero-rated, VI-IV-1; Memo 4-4 para. 5; Policy P-040 (obsolete)

Defective goods

• rebate after importation, 215.1(2)–(3)

Deferred profit sharing plan

- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(v)
- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)
- financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 35

Defined benefits pension plan

• defined

Defined benefits pension plan (cont'd)

- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1)
- • for pension plan expenses, 172.1(1)
- financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 36

Defined contribution pension plan

- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1)
- • for pension plan expenses, 172.1(1)
- financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 35

Definitions, generally, 123(1); Memo 1-5

Deformed foot or ankle, appliance made to order, zero-rated, VI-II-24; Memo 4-2 para. 40

Degree courses, see Educational services

Delivered

 meaning of, for HST place of supply rules, New Harmonized Value-added Tax System Regulations s. 3

Delivery charges, see also Freight transportation service

- exempt or zero-rated where included in price of exempt or zero-rated item, 138; Policy P-159R1, P-160R
- water, exempt, V-VI-23; Info Sheet GI-011

Delivery of property

- by registrant for non-resident, 179, 180
- for export, zero-rated, VI-V-1, 12; Memo 4-5-2 paras. 1–20, 39, 40
- in Canada, constitutes supply in Canada, 142(1)(a); Policy P-078R
- outside Canada, constitutes supply outside Canada, 142(2)(a); Policy P-078R
- to participating province, HST applicable, IX-II-1
- deemed delivery, IX-II-3; New Harmonized Value-added Tax System Regulations s. 3
- when tax payable, 168(3)

Demand, see also Requirement to provide documents

- for information, see Information: requirement to provide
- for return, 282
- • failure to answer, 283; TIB B-100
- third-party, see Garnishment (of amounts payable to tax debtor)

Demurrage

• charge, non-taxable, 162.1(a), 182(3)(c)

Density rights, sale of, Memo 19-5 para. 70

Dental

- artificial teeth, zero-rated, VI-II-11; Memo 4-2 para. 18
- hygienist service, exempt, V-II-8
- insurance, 123(1)"insurance policy"(b)
- management company, 123(1)"exempt supply" (Analysis)
- practice, sale of, 167(1); Memo 14-4 para. 28
- practitioner, V-II-1"medical practitioner"
- service, exempt, V-II-2, V-II-5; Policy P-238

Dentist, see Dental; Medical: practitioner

Dentures, zero-rated, VI-II-11; Memo 4-2 para. 18

Department of National Revenue, see Revenue Canada

Departure from Canada, see Leaving Canada

Deposit

- account, operation of, constitutes financial service, 123(1)"financial service"(b)
- · bottles, see Containers and coverings
- deemed not to be consideration, 168(9); Memo 300-6-8; Memo 19-1 paras. 66-71
- direct, of refunds, Form GST469
- forfeited, 182; Memo 400-3-12
- mineral, exploration or exploitation rights, 162(1)
- of funds in Canada, related service to non-resident not zerorated, VI-IX-1(a)(i)
- peat, exploration or exploitation rights, 162(1)
- real property, Memo 19-1 paras. 66-71
- returnable container, see Containers and coverings
- -taking financial institution, GST treatment of products and services, Memo 17-2

Deputy Minister, see also Commissioner

- application for extension of time to object, to be sent to, 303(3)
- defined, 123(1)
- may exercise powers and perform duties of Minister, 275(1)
- specific powers re solicitor-client privilege, 293(6), (7)

Derivative assessment, 325

Designated activity (municipality)

- defined, 259(4), V-VI-1
- supplies in course of, exempt, V-VI-28

Designated charity

- designation of, 178.7(3)
- election for supplies to be taxable, 178.7(2)
- • supplies taxable, when election made, V-V.1-1(d.1)
- exclusion from simplified accounting rules, 225.1(11); Info Sheet GI-066
- permitted to elect for streamlined accounting, 227(1)
- • Special Quick Method permitted, *Streamlined Accounting* (*GST/HST*) *Regulations* ss. 19(3)(a), 19(4)(b)(ii), 19(5)(a), 20(1)

Designated municipal property

- basic tax content of, 198.1(1)
- defined, 123(1)
- sale of, when personal property, 141.2(2)
- • credit to vendor for tax previously paid, 200.1
- • passenger vehicle, 203(4)
- • taxable even when sold by small supplier, 166(c)

Designated pension entity

• defined, 172.2(1)

Designated reporting period

• for which no GST return required, 238.1, TIB B-072

Designated supply

 defined, Streamlined Accounting (GST/HST) Regulations s. 19(1)

Designation as municipality, see Municipality

Deslanoside (drug), zero-rated, VI-I-2(e)(iv)

Dessert products, VI-III-1

 flavoured whipped, taxable in single serving, VI-III-1(n); Memo 4-3 para. 27

Destination

- defined
- for HST rate on freight transportation, IX-VI-1; Memo 28-2 para. 13
- for zero-rating of freight transportation, VI-VII-1(1); Memo 28-2 para. 12

Destruction

- · of goods
- for non-resident, service zero-rated, VI-V-19; Memo 4-5-3 para. 79
- • rebate after importation, 215.1(2), (3)
- of records, permission for, 286(6); Memo 15-1

Deterioration of goods

• rebate after importation, 215.1(2)–(3)

Determination of tax status

- appeal of, 216(4), 216(7)
- defined, 216(1)

Developer

• defined (re Northumberland Strait Crossing), 362(1)

$\textbf{Development charges (municipal), exempt}, \ V\text{-}VI\text{-}20(c)$

Devices

- · coin-operated, see Coin-operated device
- communication, for hearing- or speech-impaired to use telephone, VI-II-2; Memo 4-2 para. 1
- converting sound to light signals, for hearing-impaired, zerorated, VI-II-7; Memo 4-2 paras. 12, 13
- heart-monitoring, zero-rated, VI-II-3; Memo 4-2 paras. 2, 3
- · medical, see Medical
- patterning, for disabled, zero-rated, VI-II-19; Memo 4-2 para.
 29
- selector control, for disabled, zero-rated, VI-II-8; Memo 4-2 para. 14

Diabetes, see Insulin

Diagnostic service

- constitutes institutional health care service, V-II-1"institutional health care service"(a)
- in health care facility, exempt, V-II-2
- provided by laboratory, exempt, V-II-10; Memo 300-4-2 paras. 18–19; Health Care Services (GST/HST) Regulations; TIB B-019
- provided by medical practitioner, exempt, V-II-5

Dialysis machine

- parts and attachments for, VI-II-32; Memo 4-2 para. 61(a)
- zero-rated as medical device, VI-II-5.2; Memo 4-2 para. 10

Diamonds, see Jewellery

Diaper

 children's, provincial point-of-sale rebate, see Children's clothing

Diapers, see Incontinence products

Dies, jigs, molds, tools and fixtures

 supplied to non-resident, zero-rated, VI-V-14; Memo 4-5-2 paras. 46, 47

Diesel fuel, see also Fuel

- defined, Deduction for Provincial Rebate (GST/HST) Regulations s. 1
- excise tax on, I-9.1; Memo 800-1, 800-4
- excluded from non-resident business rebate for goods exported, 252(1)(c)

Dietary supplements, taxable, VI-III-1; Memo 4-3 paras. 16–19; Policy P-240; Info Sheet GI-001; Memo 4-3 paras. 3, 6, 148–159

Dietetic services

- exemption for, V-II-7.1
- practitioner of, V-II-1"practitioner"

Dieticians, see Dietetic services

Digital platform, *see also* Non-resident e-commerce supplier (e.g., Netflix, AirBNB)

• defined, 211.1(1)

Digital Services Tax Act

• compliance with required before refunds etc. paid, 229(2), 230(2), 238.1(2)(c)(iii), 263.02, 296(7)

Digitized products, downloading, TIB B-090

Digitoxin (drug), zero-rated, VI-I-2(e)(ii)

Digoxin (drug), zero-rated, VI-I-2(e)(i)

Diligence defence for director's liability, 323(3)

Dining club, see Club

Dinner, see also Food; Meals

- fund-raising, charity or political party, V-V.1-2, V-VI-2(m)(iii), V-VI-3, 18
- HST on admission, where sold before October 24/96, 356(5); TIB B-077

Diploma courses, see Educational services

Diplomats

- Canadian, deemed resident in Canada, 132(1)(d)
- effects, no tax on importation, VII-1
- rebate for GST/HST paid, 261, VI-VIII (Analysis); Memo 18-3

Direct attribution method (for ITC allocation of financial institution)

- defined, 141.02(1)
- required, 141.02(12)

Direct cost

- defined, 123(1)
- supplies by public service bodies where charges do not exceed direct cost, exempt, V-V.1-5.1, V-VI-6

Direct deposit (of refunds), Form GST469

Direct input

• to surety under construction bond, defined, 184.1(2)(c)

Direct input (for ITC allocation of financial institution)

- allocation of, 141.02(12), (13)
- defined, 141.02(1)

Direct marketing, see Direct seller

Direct or indirect

- benefit to members, effect on exemption for membership, V-VI-17
- remuneration for performance, effect on exempt supply, V-VI-11
- tax benefit, general anti-avoidance rule, 274; TIB B-045
- transfer by tax debtor to related person, 325

Direct seller

- alternate collection method, 178.1–178.5; Memo 14-1; Info Sheets GI-125, GI-126
- • adjustment for goods sold in HST province, 178.3(6)
- • adjustment for goods sold outside HST province, 178.3(5)
- • effect of approval, 178.3; Memo 14-1 paras. 24-31
- • HST exclusion, X-I-26
- defined, 178.1; Memo 1-5
- list of, "Current" tab (Binder C1)
- network seller rules, 178; Info Sheet GI-052
- sales aids, Info Sheet GI-023

Direction

• defined, Offset of Taxes (GST/HST) Regulations s. 2

Director, of corporation

- due diligence defence, 323(3)
- guilty of offences of the corporation, where acquiesced in, 330
- liable for unremitted tax, 323

Disability, see Disabled person or disabled individual

Disabled person or disabled individual

- board and lodging at camp for, exempt, V-VI-13
- · care and supervision
- • at residence for, exempt, V-IV-2
- • at supplier's establishment, V-IV-3
- certified institution employing, see Certified institution (employing disabled individuals in manufacturing)
- · charity employing or training, see Designated charity
- classes or activities for, exempt, V-VI-12
- employment of, in manufacturing of goods, *see* Certified institution (employing disabled individuals in manufacturing)
- homemaker service for, exempt, V-II-13
- medical devices for, zero-rated, VI-II; Memo 4-2
- • auxiliary driving control
- • addition of, *see* Conversion: of vehicle for use by disabled
- • zero-rated, VI-II-18; Memo 4-2 para. 26
- • cane, VI-II-27; Memo 4-2 para. 45
- • clothing, VI-II-36; Memo 4-2 paras. 52, 53
- • commode chair, VI-II-14; Memo 4-2 para. 22
- communication device for telephone, VI-II-2; Memo 4-2 para. 1
- converter of sound to light signals, VI-II-7; Memo 4-2 paras. 12, 13
- • crutch, VI-II-27; Memo 4-2 para. 45
- • feeding utensils, VI-II-38; Memo 4-2 paras. 56, 57
- • footwear, VI-II-24.1; Memo 4-2 paras. 41, 42
- • hospital bed, VI-II-4; Memo 4-2 paras. 4-6
- • invalid chair, VI-II-14; Memo 4-2 para. 22
- • patient lifter, VI-II-15; Memo 4-2 para. 23
- • patterning device, VI-II-19; Memo 4-2 para. 29
- • selector control device, VI-II-8; Memo 4-2 para. 14

- • spinal brace, VI-II-23; Memo 4-2 para. 39
- • toilet, bath or shower seat, VI-II-20; Memo 4-2 para. 30
- • walker, VI-II-14; Memo 4-2 para. 22
- • wheelchair, VI-II-14; Memo 4-2 para. 22
- • wheelchair lift, VI-II-14; Memo 4-2 para. 22
- • installation of, service zero-rated, VI-II-18.1; Memo 4-2 paras. 27, 28
- • wheelchair ramp, VI-II-16, VI-II-17; Memo 4-2 paras. 24, 25
- public passenger transportation services for, exempt, V-VI-1"transit authority"(b)(ii), V-VI-24
- recreational camp for, exempt, V-VI-13
- training to cope with disability, exempt, V-II-14, 15; Info Sheets GI-112, GI-113
- · vehicle conversion for
- • lease of vehicle, reduced tax, 258.1(7); Info Sheet GI-199
- •• rebate on importation of vehicle, 258.1(6), 258.2; Info Sheet GI-199
- rebate on purchase of vehicle, 258.1(2)–(5); Info Sheet GI-199
- • zero-rated, VI-II-18.1; Memo 4-2 paras. 27, 28
- vehicle converted for, rebate, 258.1, 258.2; Info Sheet GI-199

Disbursements

- lawyers', Policy P-209R
- whether included in consideration for fees, former 178; Policy P-209R

Discarding goods

• for non-resident, service zero-rated, VI-V-19; Memo 4-5-3 para. 79

Disclosure of tax in sale agreements

 builders in Ontario and BC, New Harmonized Value-added Tax System Regulations, No. 2, s. 50; Info Sheet GI-090

Disclosure of tax on invoices

- invoice amended after the fact to show GST, Policy P-118R
- required, 169(4), 223; Disclosure of Tax (GST/HST) Regulations; Input Tax Credit Information (GST/HST) Regulations; Memo 3-1 paras. 43–46; Memo 8-4; TIB B-013
- where invoice silent, Policy P-116

Discount on purchase price, treatment of

- by coupon, 181
- by gift certificate, 181.2; Policy P-202
- for early payment, 161; Memo 3-9
- volume, see Volume rebates or discounts

Discounter, income tax rebates, 158; Memo 17-10

• bad debt of, Policy P-123; Memo 17-10 paras. 15-16

Dishonoured cheque, see Cheque: dishonoured

Dishwasher, see Appliance: kitchen

Disks and tapes, see Computer carrier media

Dismantling property prior to export

 for non-resident, service zero-rated, VI-V-19; Memo 4-5-3 para. 80; Memo 19-1 para. 47

Disorder

• training to cope with, exempt, V-II-14, 15; Info Sheet GI-112

Dispensing fee, for prescription drugs, zero-rated, VI-I-4; Memo 4-1 para. 14

Disposing of goods

 for non-resident, service zero-rated, VI-V-19; Memo 4-5-3 para. 79

Distributed investment plan, see also Investment plan

- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1)
- information about investors to be provided to plan, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 52, 71; Notice 259

Distribution

• defined, for election between related corporations, 156(1)

Distribution platform operator, *see also* Non-resident e-commerce supplier (e.g., Netflix, AirBNB)

defined, 211.1(1)

Distributor

- · direct seller rules, see also Direct seller
- • adjustment for goods sold in HST province, 178.4(6)
- • adjustment for goods sold outside HST province, 178.4(5)
- • defined, 178.1; Memo 1-5
- • effect of approval of alternate collection method, 178.4; Memo 14-1 paras. 36–43; Info Sheet GI-125
- · lottery corporation and casino rules
- defined, 188.1(1); Games of Chance (GST/HST) Regulations s, 5(1)
- • effect of supply of right by distributor, 188.1(3)
- • effect of supply of right by lottery issuer, 188.1(2)
- · returnable container rules
- • defined, 226(1)

Diversion of article to non-exempt use, see also Conversion

• no FST payable after 1990, 118(6.1)

Dividend

- garnishment of, 317(6)
- in kind, excluded, 123(1)"financial service"(f), 149(1)(b)(i)
- income from, whether causes person to be financial institution, 149(1)(b), (4)
- patronage, see Patronage dividend
- payment or receipt of, 123(1)"financial service"(f)

Division, see Branch or division

Doctor's services, see Health care services, exempt

Document

- · books and records, see Books and records
- · communication of information in, 295
- copies, where seized, 291(1)
- defined, 123(1)
- destruction or alteration of, offence, 327(1)(b)
- · documentation
- • for electronic sales to Indians, Info Sheet GI-127
- • for input tax credit, 169(4), (5), 223; Input Tax Credit Information (GST/HST) Regulations; Memo 8-4
- for sales to provincial governments, Memo 18-2 paras. 26–28
- electronic, print-out used as evidence, 335(12.1); Memo 7-5 para. 11
- · evidencing a financial instrument
- • no GST on importation, VII-10

- • no HST on bringing into participating province, X-I-17
- failure to provide, \$100 penalty, 284
- false statement in, offence, 327(1)(a)
- filing fee, supply exempt, V-VI-20(a), (b), V-VI-20(e)
- foreign-based, requirement to provide, 292(2)
- inspection and audit of, 288; Memo 500-3-1
- memorial, for charge on property of tax debtor, 316
- proof of, by CRA, 335(5), (8)
- requirement to provide, 289(1); Memo 15-1 para. 22
- search warrant, 290(1)
- seizure of, 290(5)–(8)
- service of, 333
- solicitor-client privilege with respect to, 293
- supplied by government or municipality, exempt, V-VI-20(d)
- who can sign, 279

Documentary requirements, see Document: documentation

Dog, for blind or hearing-impaired person, *see* Guide dog, supply of and training individual to use

Dollar amounts in legislation and regulations

- \$0.05 to which coin device charges rounded, 165(3)(b) [repealed], 165(3.1)(b) [repealed], 165.1(1)(b)
- \$0.25 limit below which no tax payable in pay telephone, 165.1(1)(a)
- \$0.70 limit below which no tax payable in pay telephone, 165(3) [repealed]
- \$1 maximum admission charged by public sector body, exempt, V-VI-9
- \$1 nominal security posted by certain non-residents, Memo 2-6; Policy P-201
- \$1 optional flat rebate per night for non-resident camping accommodation before 2018, 252.1(5)(a)
- \$2 below which amounts neither collected nor refunded, 297.1
- \$4 limit for no Ontario HST on food and beverages, *Deduction* for Provincial Rebate (GST/HST) Regulations Sch. 1, s. 11
- \$5 maximum consideration for each item sold by volunteers for public sector body, exempt, V-VI-4(c)
- \$5 minimum consideration for freight transportation service (including mail) to outside Canada, zero-rated, VI-VII-6, 7
- \$5 minimum postage, no provincial portion of HST, IX-VII-
- \$5 minimum tax paid per receipt on claim for goods removed from HST province, *New Harmonized Value-added Tax System Regulations*, *No.* 2, s. 22(a)
- \$5 optional flat rebate per night for non-resident accommodation before 2018, 252.1(5)(a)
- \$5 valuation of computer carrier media for FST inventory rebate, *Federal Sales Tax Inventory Rebate Regulations* s. 4(a)B(ii)
- \$20 non-taxable returning resident goods 24-hour exemption before June 13/95, VII-1
- \$20 per day maximum for exempt supply of short-term rent, V-I-6(b); Memo 19-2-2 paras. 4–6, 10–11
- \$20 threshold for mail and courier imports (effective July 1/92), VII-7; Courier Imports Remission Order s. 4; Postal Imports Remission Order s. 4
- \$25 minimum rebate claim for goods removed from HST province, *New Harmonized Value-added Tax System Regulations*, *No.* 2, s. 22(b)

Dollar amounts in legislation and regulations (cont'd)

- \$25 monthly threshold for self-assessment of tax on bringing property or services into HST province, *New Harmonized Value-added Tax System Regulations*, *No.* 2, ss. 10(b), 11(b), 15(b)
- \$25 or less total interest and penalty may be waived, 280.2
- \$30 deemed maximum tax return preparation charge by tax refund discounter, 158(a)(ii)
- \$30 purchase price below which minimal GST data need be shown on invoice, *Input Tax Credit Information (GST/HST) Regulations* s. 3(a)
- \$40 threshold for non-taxable courier imports from US or Mexico, VII-7.01
- \$50 minimum purchase per receipt for non-resident business rebate for exported goods, 252.2(d.1)
- \$50 non-taxable returning resident goods 24-hour exemption after June 12/95, VII-1
- \$50 per square metre calculation of estimated FST for FST new housing rebate, Federal Sales Tax New Housing Rebate Regulations s. 3(a), 4(3)(a)
- \$60 gift from outside Canada non-taxable, VII-1; Customs Tariff 98.16
- \$60 gift from outside HST provinces, no HST, X-I-6
- \$75 maximum claim for rebate on short-term accommodation at flat \$5 per night, 252.2(g)
- \$100 automobile air conditioner tax, I-7, I-8
- \$100 non-taxable returning resident goods 48-hour exemption before June 13/95, VII-1
- \$100 penalty for failing to file return electronically, *Electronic Filing and Provision of Information (GST/HST) Regulations* s. 3(a)
- \$100 penalty for failing to pay amount over \$10,000 electronically, 280.12
- \$100 penalty for failure to provide information, 284
- \$150 purchase price below which less GST data need be shown on invoice, *Input Tax Credit Information (GST/HST) Regulations* s. 3(b)
- \$200 base for calculation of weekly tax on imported car, *Value of Imported Goods (GST/HST) Regulations*, s. 15:A(a)(iii)
- \$200 minimum purchases for non-resident rebate, 252.2(e)
- \$200 non-taxable returning resident goods 48-hour exemption after June 12/95, VII-1
- \$250 minimum penalty for false statement or omission, 285
- \$250 minimum penalty for recipient of non-resident ecommerce supply providing false information, 285.02
- \$250 penalty for failing to file return electronically more than once, *Electronic Filing and Provision of Information* (GST/HST) Regulations s. 3(b)
- \$250 penalty for failure to file return when demanded, 283
- \$250 penalty per housing unit not reported by builder for certain HST adjustments, Electronic Filing and Provision of Information (GST/HST) Regulations ss. 13, 16
- \$300 base for calculation of weekly tax on imported truck, SUV or van, Value of Imported Goods (GST/HST) Regulations, s. 15:A(a)(i)
- \$300 intangible property threshold for HST place-of-supply rules, *New Harmonized Value-added Tax System Regulations* ss. 6(2)(a), 8(a)
- \$300 minimum transitional credit for small businesses, 346(2)
- \$300 non-taxable returning resident goods 7-day exemption before June 13/95, VII-1
- \$300 transitional credit for small supplier taxi business, 347(2)(b)

- \$500 maximum non-resident rebate claimable from duty-free shop, *Non-resident Rebate (GST/HST) Regulations* s. 3(b)
- \$500 minimum purchase of pesticides for zero-rating before March 11, 1992, VI-IV-10; *Agriculture and Fishing Property (GST/HST) Regulations* s. 1(4) (repealed); Finance news releases 92-020, 93-039
- \$500 non-taxable returning resident goods 7-day exemption after June 12/95, VII-1
- \$800 cap on automobile lease payments for ITC purposes 2001–2021, 235
- \$900 cap on automobile lease payments for ITC purposes since 2022, 335
- \$1,000 base for calculation of weekly tax on imported motor home or RV, Value of Imported Goods (GST/HST) Regulations, s. 15:A(a)(ii)
- \$1,000 maximum fine on conviction where no penalty specified, 329(2)
- \$1,000 maximum "cumulative amount" for no return to be required, 238.1(3)
- \$1,000 maximum transitional credit for small businesses, 346(2)
- \$1,000 minimum consideration for zero-rated sale under EDC certificate, VI-V-1.2(b)
- \$1,000 minimum fine on conviction for failure to file return, 326(1)(a)
- \$1,500 maximum Nova Scotia new housing rebate, 254(2.1), 254.1(2.1), 255(2.1), 256(2.1); Memo 19-3-8 paras. 11, 14, 16, 19
- \$2,000 minimum value for art, jewellery or rare book to be given certain specified tangible personal property treatment, Specified Tangible Personal Property (GST/HST) Regulations \$ 2
- \$2,500 minimum security posted by non-resident performers before March 20/97, Memo 2-6; Policy P-201
- \$3,000 maximum annual net tax for nominal security posted by non-residents, Memo 2-6; Policy P-201
- \$3,000 minimum base for instalments of tax, 237(3)
- \$5,000 maximum fine for disclosing confidential information, 328
- \$5,000 minimum consideration for specified property subject to transitional rule re prepaid supplies to consumers, 337(7)
- \$5,000 minimum security posted by non-residents, Memo 2-6; Policy P-201
- \$5,000 penalty for using or possessing zapper software or hardware, 285.01(2)(a), (3)(a)
- \$5,000 threshold for small employer not to account for tax on deemed supply to pension plan, 172.1(9), (10)
- \$6,300 maximum new housing rebate, 254(2), 254.1(2), 255(2), 256(2), 256.2(3)–(5)
- \$10,000 above which a required payment to CRA must be electronic from 2024, 278(3)
- \$10,000 maximum penalty for failing to provide investor information to investment plan (for financial institution HST allocation rules), *Selected Listed Financial Institutions*Attribution Method (GST/HST) Regulations ss. 52(12), (13), 71(3)
- \$10,000 maximum unrecoverable tax to be qualifying small investment plan (for financial institution HST allocation rules), Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 7(2)
- \$10,000 minimum cost of capital property for input tax credit under Special Quick Method for public service bodies, Streamlined Accounting (GST/HST) Regulations s. 21(1)C(a)

Dollar amounts in legislation and regulations (cont'd)

- \$10,000 minimum fine for using, possessing, making or selling zapper software or hardware, 327.1(2)
- \$10,000 minimum value of specified supply for Special Quick Method for public service bodies, Streamlined Accounting (GST/HST) Regulations s. 19(1)"specified supply"(b)
- \$10,000 penalty for making or selling zapper software or hardware, 285.01(4)(a)
- \$16,080 maximum Ontario owner-built home rebate when not paying HST on land, New Harmonized Value-added Tax System Regulations, No. 2, s. 46(2)(d)
- \$17,588 maximum BC owner-built home rebate when not paying HST on land, *New Harmonized Value-added Tax System Regulations*, *No.* 2, s. 46(2)(d)
- \$24,000 maximum Ontario new housing rebate, *New Harmonized Value-added Tax System Regulations, No.* 2, ss. 41(2), 43(1), 45(2), 46(2)(c), 47(3), 47(5), 47(7)
- \$25,000 maximum fine on conviction for failure to file return, 326(1)(a)
- \$30,000 cap on cost of automobile for input tax credit before 2022, 201(b)A, 202(1)
- \$30,000 taxable supplies threshold for registration being required
- • Canadian resident (whether small supplier), 148
- • non-resident e-commerce, 211.12(2), 211.22(2)
- \$34,000 cap on cost of automobile for input tax credit since 2022, 201(b)A, 202(1)
- \$35,000 limit for PEI new housing rental property rebate, *Real Property (GST/HST) Regulations* s. 5(1)b)(ii)
- \$50,000 minimum fine on indictment for using, possessing, making or selling zapper software or hardware, 327.1(3)
- \$50,000 or less, personal property of financial institutions, 173(3)(c), 204; Policy P-060
- \$50,000 or more, remittance required through financial institution before 2024, 278(3)
- \$50,000 penalty for second infraction using or possessing zapper software or hardware, 285.01(2)(b), (3)(b), (4)(b)
- \$50,000 small supplier threshold for public service body, 148(1)(b), 148(2)(b)
- \$55,000 cap on cost of zero-emission automobile for input tax credit March 19/19-Dec. 31/21, 201(b)A, 202(1)
- \$59,000 cap on cost of zero-emission automobile for input tax credit since 2022, 201(b)A, 202(1)
- \$70,000 inventory limit for small business alternate claim for FST inventory rebate, Federal Sales Tax Inventory Rebate Regulations s. 4(b)(ii)(B)
- \$87,500 maximum cost of land for full rental housing rebate, 256.2(6)
- \$100,000 maximum annual taxable supplies for nominal security posted by non-residents, Memo 2-6; Policy P-201
- \$100,000 minimum penalty for s. 325 avoidance planning, 285.03(2)(b)
- \$100,000 penalty for second infraction making or selling zapper software or hardware, 285.01(4)(c)
- \$100,000 plus gross compensation, maximum civil penalty, 285.1(5)(b)(ii)
- \$112,500 maximum cost of land for any rental housing rebate, 256.2(6)
- \$175,000 maximum gross revenue for charity to remain small supplier, 148.1(2)(b), (c) [repealed]

- \$200,000 sales threshold to use Quick Method before 2013, Streamlined Accounting (GST/HST) Regulations, s. 16(1)(b), (2)
- \$250,000 maximum gross revenue for charity to remain small supplier, 148.1(2)(b), (c)
- \$250,000 minimum shipment of imported art on consignment that can be imported tax-free, *Non-Taxable Imported Goods* (GST/HST) Regulations s. 3(g)(i)
- \$350,000 maximum cost for full new housing rebate, 254(2)(h), 256(2)(e), 256.2(3)–(5)
- \$374,500 maximum cost for full new housing rebate
- • cooperative housing share, 255(2)(g)
- • purchase of building only, 254.1(2)(h)
- \$400,000 maximum new home value for Ontario new housing rebate, see \$24,000
- \$400,000 sales threshold to use Quick Method after 2012, Streamlined Accounting (GST/HST) Regulations, s. 16(1)(b), (2)
- \$450,000 maximum cost for any new housing rebate, 254(2)(c), 256(2)(b), 256.2(3)–(5)
- \$450,000 minimum home sale of grandparented housing required to be reported by builder, *Electronic Filing and Provision of Information (GST/HST) Regulations* s. 1"specified housing supply"
- \$481,500 maximum cost for any new housing rebate
- • cooperative housing share, 255(2)(d)
- • purchase of building only, 254.1(2)(c)
- \$500,000 limit of annual taxable supplies for simplified input tax credit claims before 2013, *Streamlined Accounting* (GST/HST) Regulations, s. 21.2
- \$500,000 limit of annual taxable supplies for simplified rebate claims before 2013, Public Service Body Rebate (GST/HST) Regulations s. 7
- \$500,000 maximum fine on summary conviction for using, possessing, making or selling zapper software or hardware, 327.1(2)
- \$525,000 maximum new home value for BC new housing rebate, see \$26,250
- \$1,000,000 annual revenues until 2021-22, above which financial institution must file annual information return, 273.2(2)(c)
- \$1,000,000 limit of annual taxable supplies for simplified input tax credit claims after 2012, *Streamlined Accounting* (GST/HST) Regulations s. 21.2
- \$1,000,000 limit of annual taxable supplies for simplified rebate claims after 2012, Public Service Body Rebate (GST/HST) Regulations s. 7
- \$1,000,000 maximum fine on indictment for using, possessing, making or selling zapper software or hardware, 327.1(3)
- \$1,000,000 maximum security posted by non-residents, Memo 2-6; Policy P-201
- \$1,000,000 of more fees from granting credit, deemed financial institution, 149(1)(c)(iii)
- \$1,500,000 annual sales before 2022, must file returns electronically, *Electronic Filing and Provision of Information* (GST/HST) Regulations s. 2(a)
- \$1,500,000 limit of annual taxable supplies for annual filing, 248(1), (2)
- \$2,000,000 annual revenues from 2022, above which financial institution must file annual information return, 273.2(2)(c)
- \$2,000,000 purchase threshold for simplified input tax credit claims, before 2013, *Streamlined Accounting (GST/HST)*Regulations s. 21.2

Dollar amounts in legislation and regulations (cont'd)

- \$2,000,000 purchase threshold for simplified rebate claims before 2013, *Public Service Body Rebate (GST/HST)*Regulations s. 7
- \$4,000,000 purchase threshold for simplified input tax credit claims, after 2012, Streamlined Accounting (GST/HST) Regulations s. 21.2
- \$4,000,000 purchase threshold for simplified rebate claims after 2012, Public Service Body Rebate (GST/HST) Regulations s. 7
- \$6,000,000 annual taxable supplies limiting ITC claims to 2 years, 225(4)(a)(ii)
- \$6,000,000 annual taxable supplies requiring full details on notice of objection, 301(1)(b)(ii), 301(1.2)
- \$6,000,000 limit of annual taxable supplies for quarterly filing, 245(2)(b)(i), 247
- \$10,000,000 Canadian beneficiary's interest in non-resident trust can make trust subject to special Division IV tax on FIs, 217.1(1)(b)(iv), Financial Services and Financial Institutions (GST/HST) Regulations s. 5
- \$10,000,000 limit of annual investment limit of non-financial institution, 149(1)(b)(ii)
- \$10,000,000 maximum investments in plan to be specified investor, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 16(1)"specified investor"
- \$10,000,000 maximum investment in plan to be selected investor for information-sharing purposes, *Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations* s. 52(1)"selected investor"
- \$10,000,000 minimum investment in plan to be qualifying investor for information-sharing purposes, *Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations* s. 52(1)"qualifying investor"(c)(i)
- \$10,000,000 taxable sales threshold for "large business" required to recapture Ontario/BC HST ITCs, *New Harmonized Value-added Tax System Regulations*, *No.* 2, s. 27(1), 27(3)(c), 27(8)–(10)
- \$100,000,000 asset threshold for qualifying private investment plan, *Selected Listed Financial Institutions Attribution Method* (*GST/HST*) *Regulations* s. 7(3)(a)(i)(B), (a)(ii)(B), (b)(ii)(B), (b)(ii)(B)
- \$100,000,000 threshold of assets or actuarial liabilities for pension plan or private investment plan to be subject to SLFI rules when 90% of plan members outside HST provinces, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 13(b)

Domestic inventory

• defined, for export distribution centres, 273.1(1)

Dominion Command

• supply of poppy or wreath exempt, V-VI-27

Donation

- casual, to resident of HST province, under \$60, no HST, X-I-6
- of prizes and trophies by persons outside Canada or participating provinces
- • no GST on importation, VII-2
- • no HST on bringing into participating province, X-I-11
- to charity
- included in consideration for supply, V-V.1-2, V-VI-2(m)(iii), V-VI-3
- included in gross revenue calculation for small supplier threshold, 148.1(1)(a)(i)
- • of goods from outside Canada or participating provinces
- no GST on importation, VII-4

- • no HST on bringing into participating province, X-I-13
- · to political party or candidate
- • included in consideration for supply, V-VI-18.2

Donkeys, taxable, Memo 4-4 para. 7

Donuts, see Doughnuts, taxable where packaged less than six

Dose inhaler, metered, VI-II-5.1; Memo 4-2 paras. 8-9

Double jeopardy, 326(3)

Double taxation, relief from

- federal sales tax (pre-1991)
- • inventory, 120
- new housing, 121
- Harmonized sales tax (HST)
- • goods subject to tax in non-HST province, 261.1, 261.2; TIB B-080

Doughnuts, taxable where packaged less than six, VI-III-1(m); Memo 4-3 paras. 87, 89, 93, 97, 126, 133, 137

Down (goose, etc.), taxable, Memo 4-4 para. 2

Downloading of digitized products, TIB B-090

Drainage system for real property, installation and maintenance by municipality, exempt, V-VI-22

Drawing, see Specified tangible personal property

Dried fruit

- bar, taxable, VI-III-1(1); Memo 4-3 para. 85
- in snack mixture or granola bar, VI-III-1(h), (i); Memo 4-3 paras. 63-68

Drinks, see Beverages

Driving service or driveaway service

 zero-rated if cross-border, VI-VII-1(1)"freight transportation service"(a.1)

Drop shipment, 179, 180; Memo 3-1 para. 97; Memo 3-3-1

- certificate, 179(2)(c)
- fungible or interchangeable property, 179(7.1)
- property subsequently exported, 179(3)
- railway rolling stock, 179(7)
- retention of possession by registrant, 179(4)
- self-assessment required, 217"imported taxable supply"(b)
- storage and shipping charges excluded from drop-shipment rules, 179(1)(d), 179(5)
- tax paid by unregistered non-resident, 180
- to registered person, 179(2)
- to unregistered person, 179(1)
- transfer of possession to carrier or warehouse, 179(5), 179(6)

Drugs

- administration of, in conjunction with laboratory, radiological or diagnostic services, exempt, V-II-10; Health Care Services (GST/HST) Regulations s. 2(b)
- digoxin, nitroglycerine and other listed drugs, zero-rated, VI-I-2(e)
- experimental, Emergency Drug Release Program, zero-rated, VI-I-2(f), Memo 4-1 para. 12
- hemp, see Industrial hemp
- illegal, zero-rated, VI-I-2(d)
- non-prescription, taxable, Memo 4-1 paras. 9, 10
- prescription, zero-rated, VI-I; Memo 4-1

Drugs (cont'd)

 used in institutional health care service, exempt, V-II-1"institutional health care service"(b), V-II-2; Memo 4-1 para.

Drver

 in residential complex, exempt, V-I-13.3; Memo 19-2-2 paras. 23-24

Ducks, zero-rated, VI-IV-1; Memo 4-4 para. 5

Due diligence defence for director's liability, 323(3)

Due dispatch, required by Minister

- assessment of other person on request, following application of general anti-avoidance rule, 274(8)
- assessment of rebate, 297(1)
- consideration of application for extension of time, 303(5)
- consideration of notice of objection, 301(3)
- payment of net tax refund, 229(1)
- refund of overpayment, 230(1)

Dues

- membership, where exempt, V-V.1-1(f), (g), V-VI-17, 18
- union exempt, 189; Memo 400-3-7

Dump truck operator

 charges to gravel pit owners not interlining, Memo 28-2 paras. 54–55

Duplex

- FST new housing rebate, 121(1)"specified single unit residential complex"
- GST new housing rebate, 254(1)"single unit residential complex", 254.1(1)"single unit residential complex", 256(1)"single unit residential complex"; Memo 19-3 para.
- • rental property, 256.2(8)(b)(i)

Duties

- customs, included in GST base, 215(1)
- provincial, whether included in GST base, 154; Taxes, Duties and Fees (GST/HST) Regulations; TIB B-029

Duty

• defined, for importation of service from foreign branch, 217

Duty-free shop

- payment of rebates to non-residents by, 252.2(b) [repealed], 275(3)
- supplies by, zero-rated, VI-V-11; Memo 4-5-2 paras. 34–36
- supplies of inventory to, zero-rated, VI-V-16; Memo 4-5-2 paras. 34, 37–38

Duty-paid value used as base for GST on importation, 215(1)

Dwelling-house

- · defined, 287
- warrant required to enter without occupant's consent, 288(2), (3)

Ε

EDC, see Export distribution centre

EDI, see Electronic Data Interchange

EDP, see Books and records

ELHT, see Employee life and health trust

EOPS (Exporters of Processing Services), see Inward processing

ESS (Electronic suppression of sales) device, see Zapper software (or hardware)

Early/late payments

- of invoices, no effect on GST, 161, 182(3); Memo 3-9
- · of tax, see Interest: payable to or by CRA

Earth stations

• downlink or uplink, see Telecommunications facility

Eating establishment

- · meaning of, Policy P-251
- supplies of food taxable, VI-III-1(q); Memo 4-3 paras. 136–139

Echinacea

· taxable, Policy P-240

E-commerce, *see* Non-resident e-commerce supplier (e.g., Netflix, AirBNB)

Educational institution, *see* Educational services; Public college; School: authority; University; Vocational school

Educational services, V-III

- courses
- credit, for degree or diploma, exempt, V-III-7; Memo 20-2, 20-3
- for elementary or secondary school students, exempt, V-III-2; Memo 20-1
- • non-credit, exempt, V-III-16
- non-resident business, supplied to, zero-rated, VI-V-18; Memo 4-5-3 paras. 73–78, Memo 20-8
- • prerequisite, exempt, V-III-10
- recognized professional or trade accreditation, exempt, V-III-6; Memo 20-4
- second-language instruction in English or French, exempt, V-III-11; Memo 20-7
- • vocational, exempt, V-III-8; Memo 20-4
- • solo flying time portion of flight instruction, Policy P-
- elementary or secondary school student defined, V-III-1; Memo 20-1
- extra-curricular activities, exempt, V-III-3
- food, for students, exempt, V-III-12, 13, 14; School Cafeteria Food and Beverage (GST/HST) Regulations; Memo 20-5; TIB B-026
- lease of property to elementary or secondary school students, exempt, V-III-15; Memo 20-1
- music lessons, exempt, V-III-9; Equivalent Courses (GST/HST) Regulations; Memo 20-6; TIB B-014
- services performed by elementary or secondary school students or instructors, exempt, V-III-4; Memo 20-1
- transportation (school bus) services, exempt, V-III-5
- tuition fees paid to private schools, exempt, V-III-2
- tutoring, exempt, V-III-9; Equivalent Courses (GST/HST) Regulations; Memo 20-6; TIB B-014

Effective date of municipal designations, Policy P-204 (obsolete)

E-File, see Electronic filing

Eggs

• for human consumption, zero-rated, VI-III-1; Memo 4-3 para.

Eggs (cont'd)

 poultry or fish, for hatching, zero-rated, VI-IV-4; Memo 4-4 para. 17; Info Sheet GI-049

Egresses

• installation of, exempt, V-VI-21.1(e)

Elderly persons, residence for, 123(1) "residential unit" (b)

Election (political)

 donation to candidate or party, included in fund-raising event price, V-VI-18.2

Election (that can be made), *see also* Application (made to CRA); Revocation

- accounting periods, 243; Memo 500-2-1
- agent, to account for tax collected on behalf of principal, 177(1.1)
- aircraft, re, see Automobile
- billing agent, to account for tax collected, 177(1.11)
- · business assets, for no tax on
- • on sale of business, 167(1)(b), (1.1); Memo 14-4
- • on supply by deceased's estate to beneficiary, 167(2); Policy P-031; Memo 14-4 paras. 29–32
- by charity
- not to use simplified calculation of net tax, 225.1(7); Info Sheet GI-066
- · by charity or qualifying non-profit organization
- • for simplified computation of rebate, 259(12)–(14)
- by closely related corporations
- • for supplies within group to be deemed at nil consideration, 156; Memo 14-5
- for supplies within group to be exempt, 150; Memo 17-14; Policy P-033
- • change in use rules apply to all capital property of corporation electing, 205(1), (2)
- ••• corporation electing deemed a listed financial institution, 149(1)(a)(xi), 151
- ••• credit unions deemed to have elected, 150(6)
- by museum or gallery
- • for input tax credits on specified tangible personal property, 176(6) [repealed], (7) [repealed]; Memo 400-3-6; TIB B-084
- by public service body, re real property
- • for input tax credits to be prorated based on use, 211
- · courses for professional or trade accreditation
- • for supply not to be exempt, V-III-6; Memo 20-4, 20-9
- defined, *Streamlined Accounting (GST/HST) Regulations* s. 2(1)
- exempt supplies within closely related group, 150; Memo 17-14; Policy P-033
- fiscal year
- • to be calendar year (corporation, partnership or organization), 244(1)
- •• to be fiscal period of business (individual or trust), 244(2)
- investment plan, see selected listed financial institution (below)
- joint venture, for operator to be deemed to make supplies, 273
- · membership in public sector body or professional organization
- • for supply not to be exempt, V-VI-17, 18
- net tax, streamlined accounting, 227; Streamlined Accounting (GST/HST) Regulations; TIB B-028, B-070; Policy P-100R
- network seller and sales representative, 178(4); Info Sheet GI-052
- nil consideration, within corporate group, 156; Memo 14-5

- • effect on *de minimis* financial institution calculation, Memo 17-7 para. 29
- passenger vehicle or aircraft, for no input tax credit and no GST on employee benefit, 173(2)–(4); Memo 9-2 paras. 45–53
- patronage dividends
- • not to retroactively reduce tax, 233(3), 233(4)
- • partial application of dividends, 233(2)(a)(ii)
- public service body, real property of, 211(1)
- Quick Method of calculating net tax, 227; Streamlined Accounting (GST/HST) Regulations; TIB B-028; Policy P-100R
- · real property
- • public service body, of, 211(1)
- • supplied by individual where adventure in the nature of trade, V-I-9(2)(b)(ii)
- • no revocation, Policy P-073
- remote work site, for self-supply rule not to apply to residential complex, 191(7); Memo 19-2-3 paras. 51–58; Policy P-090
- reporting period, 250
- • faster, HST transitional period, 363.1; New Harmonized Value-added Tax System Regulations s. 57
- • to be fiscal month, 246
- • to be fiscal quarter, 247
- •• to be fiscal year, 248(1)–(3)
- residential care facility, for self-supply rule to apply to pre-Feb26/08 property, 236.4; Info Sheet GI-050
- residential complex returned by purchaser to builder, taxable, V-I-2(b)
- sale of business, for no tax, 167(1)(b), 167(1.1)
- selected listed financial institution HST apportionment
- attribution point of an investment plan or series, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 18
- • manager of investment plan
- • filing of plan's returns, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 53: Notice 260
- transfer of tax adjustments to, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 55; Notice 260
- • real-time calculation, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 49
- • reconciliation, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 50
- • tax recovery rate, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 43
- selected listed financial institution treatment, 225.2(4)
- simplified computation of public service body rebate, 259(12)–(14)
- streamlined accounting for calculating net tax, 227; Streamlined Accounting (GST/HST) Regulations; TIB B-028, B-070; Policy P-100R
- supplies at nil consideration, within corporate group, 156;
 Memo 14-5

Electricity, see also Continuous supply (electricity, gas, etc.); Continuous transmission commodity

- business, separate ITC allocation required, *Streamlined Accounting (GST/HST) Regulations* s. 21(2)
- generation by solar or wind power, right to use land deemed not a supply, 162(2)(d)

Electricity (cont'd)

- generation of, joint venture election, *Joint Venture (GST/HST)* Regulations s. 3(1)(e)
- solar panels installed on home rooftops, GI-122
- · surplus, taking up, VI-V-15.4
- transmission of, joint venture election, *Joint Venture* (GST/HST) Regulations s. 3(1)(f)

Electronic cash register

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

Electronic commerce, 217 (Analysis); TIB B-090

· documentation of tax-free sales to Indians, Info Sheet GI-127

Electronic Data Interchange

• considered telecommunication service, TIB B-090

Electronic data processing, see Books and records

Electronic eyewear, zero-rated, VI-II-9.1

Electronic filing, 278.1; Memo 7-5

- authorization for, 278.1(3); Memo 7-5 para. 5
- deemed to be return filed in prescribed form, 278.1(3); Memo 7-5 paras. 7–8
- defined, 278.1(1); Memo 7-5 para. 4
- mandatory, 278.1(2.1), 280.11; Electronic Filing and Provision of Information (GST/HST) Regulations s. 2; Info Sheet GI-118
- print-out acceptable as evidence, 335(12.1); Memo 7-5 para.

Electronic filing (for non-resident e-commerce supplier)

• defined, 211.1(1)

Electronic mail, see Telecommunication service

Electronic payment

- defined, 278(0.1)
- required for payment to CRA over \$10,000 starting 2024, 278(3)
- • penalty for non-compliance, 280.12

Electronic records, see Books and records: computerized

Electronic suppression of sales device

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

Element of a supply, see Combined supply

Elementary or secondary school student

- defined, V-III-1; Memo 20-1
- exemptions for supplies to, V-III-2, V-III-3, V-III-4, V-III-5, V-III-12, V-III-14, V-III-15; Memo 20-5

Elementary school, see Educational services; School: authority

Elevator

zero-rated when for use by disabled, VI-II-14; Memo 4-2 para.

Eligible amount

• defined, for pension plan rebate, 261.01(1); TIB B-XX4

Eligible author

- defined, 177.1(2)
- no tax on certain supplies to, 177.1(3)

Eligible beverage (for 2024-25 temporary GST holiday)

- defined, VI-XI-1
- · zero-rated, VI-XI-12

Eligible maker

- defined, 177.1(2)
- no tax on certain supplies to, 177.1(3)

Eligible performer

- defined, 177.1(2)
- no tax on certain supplies to, 177.1(3)

Eligible period (for 2024-25 temporary GST holiday)

· defined, VI-XI-1

Eligible property

 on election for exempt supplies, remit tax on deemed sale of, 205(1), (2)

Eligible reporting period

- for temporary cessation of filing, 238.1(2)
- for transfer of investment plan's HST apportionment adjustments to manager, *Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations* s. 55(2)(a)

Eligible roadway

- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)
- • for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 26

Eligible supply (for 2024-25 temporary GST holiday)

- · defined, VI-XI-1
- zero-rated, VI-VI-3 to 12

Eligible tour package

• meaning of, Memo 27-3 paras. 31-39; Info Sheet GI-044

Eligible travel period

- defined, ITA 67.1(5)
- ITCs allowed to long-haul truck drivers for meals, 236(1)(b)(ii)

Elk, zero-rated, VI-IV-1; Memo 4-4 para. 5; Policy P-040 (obsolete)

Embassy

- Canadian, treated as non-resident, 132(3)
- foreign, see Diplomats

Embryo, see Human embryo

Emeralds, see Jewellery

Emergency Drug Release Program

• drugs under, zero-rated, VI-I-2(f)

Emergency repair service

- of conveyance or cargo container for non-resident, zero-rated, VI-V-6; Memo 4-5-3 paras. 39–42; Policy P-067R
- of empty cargo container, for non-resident, VI-V-6.2; Memo 4-5-3 paras. 44-45
- of railway rolling stock, for non-resident, VI-V-6.1; Memo 4-5-3 para. 43; Policy P-217

Emigration, see Leaving Canada

Emission allowance

- defined, 123(1)
- tax not collectible by supplier, 221(2.1)
- tax payable directly to CRA, 228(4)

Emission of telecommunication service

• effect on place of supply, 142.1(2)

Emphyteutic leases, Memo 19-1 paras. 29-30; Memo 19-2-3 paras. 24–28; Policy P-174

Employee(s)

- allowance paid to, 174; Memo 9-3; Policy P-075R
- · association of, dues to, 189
- benefit conferred on, 170(1), 173(1); Memo 9-1, 9-2
- • automobile operating expenses, 173(1)(c)(vi)
- benefit plan, constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(viii)
- CRA, of, 275
- • not to disclose information, 295
- capital cost allowance, rebate based on, 253; Memo 500-4-6
- where reasonable automobile allowance received, Policy P-113R
- defined, 123(1)
- • for importation of service from foreign branch, 217
- pension plan for, see Pension plan
- profit sharing plan, constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(ii)
- rebate, for GST on amounts deductible for income tax purposes, 253; Memo 500-4-6; Policy P-028 (obsolete), P-113R
- reimbursement of expenses paid by, 175; Memo 9-4; Policy P-075R
- taxable benefits, 170(1), 173(1); Memo 9-1, 9-2
- trust, constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(ix)
- union activities, payment by union to employer non-taxable, 164.2
- union dues, non-taxable, 189

Employee benefit plan

- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)
- financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 37

Employee life and health trust

- defined, Financial Services and Financial Institutions (GST/HST) Regulations s. 2(2)
- financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 37
- prescribed as listed financial institution, 149(5)(g), Financial Services and Financial Institutions (GST/HST) Regulations s. 4.2

Employee PRPP contribution

• defined, 261.01(1)

Employee trust

- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)
- financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 37

Employees profit sharing plan

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2) financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 35

Employer

- defined (with respect to officer), 123(1)
- garnishment of amounts payable by, 317(2)(b)(ii)
- pension plan, see Registered pension plan
- remote work site, election for self-supply rule not to apply, 191(7); Memo 19-2-3 paras. 51–58; Policy P-090

Employer contribution

• defined, 261.01(1)

Employer resource

- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1)
- • for pension plan expenses, 172.1(1)

Employment

- benefit plan, see Employee benefit plan
- dues in respect of, exempt, 189; Memo 400-3-7
- not a supply, 123(1)"service"
- use of musical instrument in, by registrant, deemed use in commercial activities, 199(5)

Emus

- feed for, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(2.1)
- zero-rated, VI-IV-1; Memo 4-4 para. 5; Policy P-040 (obsolete)

Endeavour

• defined, 141.01(1); Memo 8-3 para. 18

Endorsement

 of financial instrument, constitutes financial service, 123(1)"financial service"(d)

Enforcement, *seee* Administration and enforcement; Collection of tax; Offences; Penalties

Engineer, see Professionals and professional services

English language instruction, exempt, V-III-11; Memo 20-7

English muffins, zero-rated, VI-III-1(m); Memo 4-3 paras. 88, 94, 137

Entertainment

- allowance or reimbursement for, Memo 9-3 para. 53; Memo 9-4 para. 38; Memo 400-3-3
- · expenses
- • incurred by employee, rebate for, 253; Memo 500-4-6
- input tax credit limited to 50%, 236(1); Memo 8-2 paras.
 50–67
- • exception for charities, 236(2)
- where staged, 123(1)"place of amusement"

Entitlements and obligations

• of registrants, Memo 3-1 paras. 35-47

Epinephrine (drug), zero-rated, VI-I-2(e)

Equal billing plan, *see* Budget payment arrangement (equal billing plan)

Equipment, see also Maintenance; Repair

• farm, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)

Equipment (cont'd)

- • sold together with accessories, Policy P-252
- · film or slide show presentation
- • cost included in direct cost, V-VI-1 [repealed]
- fishing, zero-rated, Sch VI:Part IV:10; Agricultural and Fishing Property (GST/HST) Regulations Sch:2; Info Sheet GI-049
- maintenance contract, place of supply for HST, Policy P-219
- · medical
- • included in institutional health care service, V-II-1
- lease to consumer on order of medical practitioner, exempt, V-II-3
- supplies by auction, election, 177(1.3); Property Supplied by Auction (GST/HST) Regulations s. 1(d)

Equity security

- constitutes financial instrument, 123(1)"financial instrument"
- defined, 123(1); Memo 17-1 paras. 9-11
- supply to non-resident of service of transferring, not zerorated, VI-IX-1(e)

Error

- assessment deemed valid notwithstanding any, 299(4)
- by CRA in carrying out duties, not grounds for appeal, 299(5)
- · payment of tax made in
- • input tax credit for, 296(2.1)
- • rebate of, 261

Erythrityl tetranitrate (drug), zero-rated, VI-I-2(e)(v)

Eskimo, see Indians and Indian bands

Essential Qualities of Agency, Policy P-182R; Info Sheet GI-012

Establishing a business venture in Canada

- meaning of, Policy P-173
- zero-rating of services supplied to non-resident for, VI-V-9; Memo 4-5-3 paras. 51–54

Establishment

· eating, meaning of, for zero-rating of food, Policy P-251

Establishment of commercial activity, things done deemed in course of commercial activity, 141.1(3)

Estate, see also Trust

- bankrupt, of, 265
- excluded from definition of non-profit organization, 123(1)
- included in definition of "person", 123(1)
- planning
- transfer of farmland to related person and self as joint tenants, Policy P-109
- receiver deemed not to be trustee of, 266(2)(b)
- registration of, Memo 2-1 para. 14(e)
- rules for trusts apply to, 267.1(1)
- sale of land by, V-I-9
- supply of business assets of deceased to beneficiary, no tax, 167(2); Policy P-031; Memo 14-4 paras. 29–32
- tax collected and held in trust deemed not part of, 222

Estimated federal sales tax

- defined, 121(1); Federal Sales Tax New Housing Rebate Regulations; TIB B-016
- rebate of, see Federal Sales Tax (FST): new housing rebate

Estimated provincial levy

- defined, for Ontario/BC HST transitional new housing rebates, New Harmonized Value-added Tax System Regulations, No. 2, s. 55(1)
- defined, for PEI HST transitional new housing rebates, New Harmonized Value-added Tax System Regulations, No. 2, s. 58.08(1)
- used for transitional new rebate calculation, *New Harmonized Value-added Tax System Regulations*, *No.* 2, ss. 56(4), 57(4), 58.09(4), 58.1(4)

Estimated selling price, see Streamlined accounting

Etching, see Specified tangible personal property

Ethnic foods, zero-rated, Memo 4-3 para. 146

Evasion of tax. see Offences

Evergreen seeds

• zero-rated, Policy P-240

Evidence

- · giving of
- • at inquiry, 276(5)
- • by CRA officials, whether permitted, 295(3), (4)
- print-out of electronically filed return, 335(12.1); Memo 7-5 para. 11
- proof of service, document, failure to comply, etc., 335
- required for search warrant, 290(2)
- that freight transportation service part of continuous freight movement from outside Canada, VI-VII-10
- that no input tax credit claimed by person from whom property was seized, 183(7)
- that no input tax credit claimed by person transferring property to insurer, 184(4)
- that no stopover on separate legs of continuous journey, VI-VII-1(1)"continuous journey"(b)(i), (ii)
- that property delivered for export was exported, VI-V-1(d); Memo 4-5-2 Appendix A
- that recipient of supply is unregistered or non-resident, Memo 4-5-1; Policy P-009
- that tax paid by non-resident, 180(c)
- to support claim for input tax credit, 169(4); Input Tax Credit Information (GST/HST) Regulations; Memo 8-4

Examinations, service of administering, see also Educational services: courses

 exempt, V-III-6, V-III-7, V-III-8, V-III-11, V-III-16; Memo 20-2, 20-3

Excess baggage charges, see Baggage: charges

Excess pension rebate amount

• defined, 261.01(3.3)

Exchange

- barter network, see Barter exchange network
- of coupon or voucher on purchase, 181(1)
- of gift certificate, 181.2
- of goods subject to retail sales tax for goods subject to HST, New Harmonized Value-added Tax System Regulations s. 50; Info Sheet GI-075
- of goods subject to retail sales tax for goods subject to PEI HST (2013), New Harmonized Value-added Tax System Regulations s. 58.33; Info Sheet GI-161
- of inventory, 153(3)

Exchange (cont'd)

- of money, constitutes financial service, 123(1)"financial service"(a)
- of natural gas at straddle plant, 153(6)

Exchange-traded fund

- application to use particular methods for SLFI percentages, 225.3
- defined, for SLFI HST allocation rules, 225.3(1), 225.4(2);
 Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 1(1), 6(1), 6(2)(a)
- financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 33, 34

Exchange-traded series

 defined, for SLFI HST allocation rules, 225.3(1), 225.4(2);
 Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 1(1), 6(1), 6(2)(a)

Excisable goods, see also Alcoholic beverages; Tobacco

- defined, 123(1)
- excluded from non-resident business rebate for goods exported, 252(1)(a)
- exported in bond, zero-rated, VI-V-3; Memo 4-5-2 paras. 26, 27

Excise Act, 2001

 compliance with required before refunds etc. paid, 229(2), 230(2), 238.1(2)(c)(iii), 263.02, 296(7)

Excise duties, Memo 800-2

Excise/GST, see Revenue Canada

Excise taxes, 22-28; Schedules I, II; Memo 800-1

- fuel-inefficient vehicles, I-6
- rates of, historical listing, Memo 800-4
- transportation rebate program, 68.4; Memo 800-1 paras. 21-23

Excluded activity

• defined, for pension plan expenses, 172.1(1)

Excluded amount

• of a master pension entity, defined, 172.2(1)

Excluded equity housing supply

- defined, Real Property (GSR/HST) Regulations s. 3.1(3)
- excluded from enhanced residential property rebate, *Real Property (GST/HST) Regulations* ss. 4(1)(c), 4.1

Excluded input (for ITC allocation of financial institution)

- allocation of, 141.02(14), (15)
- defined, 141.02(1)

Excluded operator, *see also* Non-resident e-commerce supplier (e.g., Netflix, AirBNB)

- defined, 211.1(1)
- not required to collect GST/HST, 211.1(1)"accommodation platform operator", "distribution platform operator"

Excluded property or service

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)

Excluded resource

• defined, for pension plan expenses, 172.1(2)

Exclusive

• defined, 123(1)

- input, see Exclusive input
- product, defined, for direct seller rules, 178.1; Memo 1-5
- use in commercial activities, input tax credit, 169(1)

Exclusive input

- for ITC allocation of financial institution
- • allocation of, 141.02(6)
- • defined, 141.02(1)
- for investment plan HST rules re non-residents
- • defined, 225.4(1)

Execution of documents, 279, 324

Executor of estate, see also Personal representative of deceased individual

- certificate required before distribution of property, 270
- defined, 267(2) [repealed]
- fees of, transitional rules
- • GST, 341.1(2); Policy P-041 (obsolete)
- • HST, 357(2); TIB B-077
- rules re, 267(1) [repealed]

Exempt services

• defined, re clearing/settlement services, 150(2.1)

Exempt supplies, Sch. V; Memo 300-4, *see also* specific subject headings

- charities, V-V.1, V-VI, especially V-VI-2, V-VI-25
- child and personal care services, V-IV; Memo 21-1
- day care, V-IV-1; Memo 21-1
- defined, 123(1)
- · educational services, V-III
- election for supplies within corporate group to be, 150; Memo 17-14
- • primary use rule before October 1992, Policy P-072 (obsolete)
- • reporting period of registrant, Policy P-033
- • revocation of, 150(4)(c); Policy P-025, P-044
- ferry, road and bridge tolls, V-VIII; Memo 28-1
- financial services, V-VII; Memo 300-4-7; TIB B-033
- health care services, V-II; Memo 300-4-2; Policy P-238, see also Health care services, exempt
- legal aid services, V-V; Memo 300-4-5
- meals supplied with rent, V-I-6.2; Memo 19-2-2 para. 9
- public sector bodies, by, V-VI; Memo 300-4-6
- real property, V-I; Memo 19-2-1, 19-2-2
- residential rents, V-I-6; Memo 19-2-2
- sale of property used in, 141.1(1)(b), 141.1(2)(b), 200(3)
- union dues, 189

Exhibit

- goods imported for, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(c)
- taxable convention, non-resident exhibitor, 167.2(2), 252.3;
 Info Sheet GI-028

Exhibition, see also Art gallery; Place of amusement

- · goods for use at
- • no GST on importation, VII-1
- • no HST on bringing into participating province, X-I-7

Exhibitor

- foreign convention, at, supply to non-taxable, 189.2(b)
- · non-resident, at taxable convention

Exhibitor (cont'd)

- • rebate of tax paid, 252.3; Info Sheet GI-028
- • supply to non-taxable, 167.2(2)

Expectation of profit, reasonable, 123(1)"commercial activity"; Policy P-176R

Expense allowance, see Allowance

Expenses

- automobile, employee benefit calculation, 173(1); Memo 9-2
- credit card, use of 6/106 or 14/114 factor, Policy P-184
- deductible for income tax purposes by employee, rebate for, 253; Memo 500-4-6; Policy P-028 (obsolete), P-113R
- incidental to performance, reimbursement to amateur performer or athlete, effect of, V-VI-11
- incurred in supply of services, reimbursement deemed part of consideration for supply, former 178
- input tax credit for, 169
- reimbursed to employee, partner or volunteer, 175; Memo 9-4; Policy P-075R
- reimbursed under warranty, 175.1

Experimental drugs

• Emergency Drug Release Program, zero-rated, VI-I-2(f)

Expiration of time, see also Limitation period

- for filing notice of appeal, application for extension, 305
- for filing notice of objection, application for extension, 303–304
- for keeping books and records, 286

Exploration or exploitation of minerals

- definition of Canada, 123(2); Policy P-152R
- joint venture election, 273, see also Joint venture
- supply of right to, deemed not a supply, 162(1)
- • amounts paid for the resources, Policy P-105R, P-110R

Export certificate, see also Export distribution centre; Export documentation

- administrative procedures, Memo 4-5-2 paras. 15-20
- authorization by Minister to use, 221.1(2); Memo 4-5-2 para.
- authorization number, 221.1(4)
- defined, 221.1(2)
- invalid use of, increase to net tax, 236.2
- issuance of, 221.1(2)
- notice of authorization, 221.1(4); Memo 4-5-2 paras. 20(a)-(d)
- revocation of authorization, 221.1(5)–(6); Memo 4-5-2 paras. 20(e)–(g)
- · supplier entitled to rely on, VI-V-1.1
- supply under, zero-rated, VI-V-1.1
- imported taxable supply to recipient, 217"imported taxable supply"(d)

Export distribution centre, 273.1; TIB B-088

- certificate
- • authorization for, 273.1(7)
- • invalid use of, increase to net tax, 236.3
- goods for, no tax on importation, VII-11
- zero-rated supply to, VI-V-1.2
- imported taxable supply to recipient, 217"imported taxable supply"(e)

Export documentation, Memo 4-5-2, see also Export certificate

Export revenue

• defined, for export distribution centres, 273.1(1)

Export revenue percentage

• defined, for export distribution centres, 273.1(1)

Export trading houses, 221.1; Memo 4-5-2 paras. 15–20, Appendix B, *see also* Export certificate

Exporters of Processing Services, see Inward processing

Exports, 142(2), VI-V; Memo 4-5-2, 4-5-3

- artistic works produced for, 252(2); Policy P-195R
- · certificate, see Export certificate
- defined, 123(1)
- determining residence status, Memo 4-5-1
- documentation for, Memo 4-5-1, 4-5-2
- excluded from threshold amount for annual or quarterly filing, 249
- goods, 142(2)(a), VI-V; Memo 4-5-2
- beer, spirits and tobacco, exported in bond, zero-rated, VI-V-3; Memo 4-5-2 paras. 26, 27
- • by charity, rebate, 260; Policy P-132
- • by non-resident business, rebate, 252(1)
- • delivery outside Canada, 142(2)(a); Policy P-078R
- duty-free shop, zero-rated, VI-V-11; Memo 4-5-2 paras.
 34_38
- • generally, zero-rated, 142(2), VI-V-1, 3, 12; Memo 4-5-2
- • purchased in Canada by non-resident business, rebate,
- used property, recovery of input tax credit, 176(2) (repealed), 176(4.1) (repealed); Memo 400-3-6
- intangible personal property, VI-V-10.1
- intellectual property, VI-V-10; Memo 4-5-3 para. 106
- not taxed, supply not made in Canada, 142(2), 165(1)
- processing services, see Processing services
- rebate
- goods exported by charity, 260; Policy P-132
- • goods exported by non-resident business, 252(1)
- residence status, Memo 4-5-1
- services, zero-rated, 142(2)(g), VI-V; Memo 4-5-3
- • advertising services, VI-V-8; Memo 4-5-3 paras. 48–50
- advisory services, VI-V-9, VI-V-23; Memo 4-5-3 paras. 51–54, 87–90
- agent's services, VI-V-5; Memo 4-5-3 paras. 23, 37–38, 90, 92
- consulting services, VI-V-9, VI-V-23; Memo 4-5-3 paras. 51–54, 87–90
- emergency repair of cargo container or conveyance, VI-V-6,
 6.2; Memo 4-5-3 paras. 39–45; Policy P-067R
- • excluded from small supplier threshold, 148(1)(a), (2)(a); Policy P-035
- • financial services, VI-IX
- • generally, VI-V-7; Memo 4-5-3; Policy P-169R
- goods imported temporarily, repair or other service, VI-V-4; Memo 4-5-3 paras. 34–36; Policy P-074
- • insurance services, VI-IX-2
- • legal services, VI-V-23; Memo 4-5-3 paras. 87–90; Policy P-206
- litigation services, VI-V-23; Memo 4-5-3 paras. 87–90; Policy P-206

Exports (cont'd)

- manufacturing services for non-residents, see Inward processing
- professional services, VI-V-23; Memo 4-5-3 paras. 87–90; Policy P-169R
- purchasing agent, VI-V-5; Memo 4-5-3 paras. 23, 37–38, 90, 92
- • sales representative, VI-V-5; Memo 4-5-3 paras. 23, 37–38, 90, 92
- • transportation services, VI-VII
- warranty of non-resident person, VI-V-13; Memo 4-5-3 paras. 55-57
- · softwood lumber, see Softwood lumber
- tangible personal property, see goods (above)
- tobacco, tax on, Memo 800-4
- warranty replacement parts and services, VI-V-13; Memo 4-5-3 paras. 55–57
- zero-rated, VI-V, VI-VI, VI-VII, VI-IX; Memo 4-5-2, 4-5-3

Expropriation, 123(1)"supply"(Q & A)

 deemed not to be severance of land, V-I-9(2)(c) closing words; Memo 19-5 para. 14

Extended warranty, see Maintenance: contract

Extension of time

- · for filing appeal, 305
- for filing notice of objection, 303, 304
- for filing return, 281; Memo 16-2 paras. 39, 40(d)
- for providing information, 281; Memo 16-2 paras. 39, 40(d)

External charge

- defined, for importation of service from foreign branch, 217
- • special rule for member of Lloyd's association, 217.1(9)(e), (f)

Extinguishment of debt, 182

Extraction of natural resources, see also Mineral; Natural resource

• place of, constitutes permanent establishment, 123(1)"permanent establishment"(a)(ii)

Extra-curricular activities, supplies exempt, V-III-3

Extremity pump or intermittent pressure pump

 for use in treating lymphedema, zero-rated, VI-II-21.1; Memo 4-2 paras. 32, 33

Eye

- artificial, zero-rated, VI-II-10; Memo 4-2 para. 17
- glasses or contact lenses, zero-rated, VI-II-9; Memo 4-2 para.
 15
- • partly finished lenses or lens blanks and frames, VI-II-32
- laser surgery, V-II-5; Policy P-207
- wear, electronic correction of vision, zero-rated, VI-II-9.1

F

FCTIP, see Foreign Convention and Tour Incentive Program

- electronic funds transfer information obtained under ITA, usable for GST/HST, 273.3
- provision of information by CRA to, for limited purposes, 295(5)(d)(viii)

FIP, see Financial institution's percentage

FST, see Federal Sales Tax (FST)

FTF penalty, see Failure to file penalty

Face mask, zero-rated, VI-II.1-2, 3, 4

Face shield, zero-rated, VI-II.1-5

Face value

• defined, Games of Chance (GST/HST) Regulations s. 5(1)

Facility

- for emission, transmission or reception of telecommunication service
- • effect on place of supply, 142.1(2)
- for providing nursing home or residential care, 259(1)"charity"
- health care, defined, V-II-1

Facsimile transmission, see Telecommunication service

Factory, constitutes permanent establishment,

123(1)"permanent establishment"(a)(i)

Failure, see also Fraud; Offences; Penalties

- to collect tax, offence, 329(1)
- to comply with conditions for filing separate returns, 239(3)(a)
- to comply with garnishment order, 317(7)
- to comply with legislation, generally, 329(2)
- to file return, offence, 326
- to file return when demanded, penalty, 283; TIB B-100
- to keep adequate records, 286(2)
- to make payment over \$10,000 electronically (from 2024), penalty, 280.12
- to pay tax
- • offence, 329(1)
- • seizure of chattels, 321(1)
- to pay tax when requested on suspicion of being about to leave Canada, seizure of chattels, 322(2)
- to provide foreign-based information or document, 292(8)
- to provide information, penalty, 284
- to remit instalments, interest, 280(2); TIB B-100; Memo 16-2 paras. 9–19
- to remit tax
- • corporation's directors liable, 323
- • interest, 280(1); TIB B-100; Memo 16-2
- • offence, 329(1); Memo 16-2 para. 75
- •• penalty where return filed late, 280.1; Memo 16-2 paras. 25–26; TIB B-100

Failure to file penalty, 280.1; TIB B-100; Info Sheet GI-024; Memo 16-2 paras. 25–26

Fair market value

- currency, where exceeds stated value, 123(1)"money"
- deemed acquisition at, capital real property, 206(2), (3)
- defined, 123(1); Memo 19-2-3 paras. 35-46; Policy P-165R
- new housing, rebate based on, 256; Memo 19-3-4 paras. 21-22
- non-profit housing, Policy P-165R
- supply for less than, 155
- supply of returnable container not at arm's length, deemed to be at, 176(2)
- supply of used tangible personal property not at arm's length, deemed to be at, 176(4) [repealed]; Memo 400-3-6
- tax calculated on, self-supply rules for real property, 191(1)–(4)
- transfer for consideration less than, not at arm's length, liability of transferee, 325(1)

Fair market value (cont'd)

• undivided interest in property transferred by tax debtor, 325(1.1)

Fairness provisions, see Taxpayer Relief (formerly Fairness)

False statement (for non-resident e-commerce supplier)

• defined, 211.1(1)

False teeth, zero-rated, VI-II-11; Memo 4-2 para. 18

Farm livestock

- feed for, zero-rated, VI-IV-2
- feeding system and components, zero-rated, VI-VI-10;
 Agriculture and Fishing Property (GST/HST) Regulations,
 Sch:1(1)(g)(vi.1), (vi.2)
- · zero-rated, VI-IV-1

Farmee

• defined, 162(4)

Farming, see also Agriculture and fishing, zero-rated

- business, joint venture election, Joint Venture (GST/HST) Regulations s. 3(1)(m)
- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)
- • for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 26
- property or service, see Farming property or service

Farming property or service

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(3)

Farmland, see also Agriculture and fishing, zero-rated

- held in joint tenancy, Policy P-183; Memo 19-5 paras. 76-97
- meaning of, Memo 19-5 para. 29
- sale of, exempt, V-I-9, V-I-10, V-I-11, V-I-12; Memo 19-5 paras. 20–40; Info Sheet GI-002
- sharecropping (lease for consideration based on share of production of crops), zero-rated, VI-IV-9; Memo 4-4 para. 35; Policy P-253
- transfer to related person and self as joint tenants, Policy P-109

Farmor

• defined, 162(4)

Farm-out agreement

- natural resources, 162(4)
- • defined, 162(1)

Farm-out of resource property, Policy P-163 (obsolete)

Fax, see also Telecommunication service; Telecommunications facility

• ruling requests made to CRA by, Memo 1-4 para. 33

Feathers, taxable, Memo 4-4 para. 2

Federal government

- employees abroad, deemed resident in Canada, 132(1)(d)
- obligation to collect GST, 122(a); TIB B-036; Memo 400-4
- obligation to pay GST, 122(a); TIB B-036; Memo 400-4
- rebate of all GST paid, GST Federal Government Departments Remission Order

Federal qualifying amount

defined, Public Service Body Rebate (GST/HST) Regulations s.

Federal Sales Tax (FST)

- repeal of effective 1991, 118
- transitional rules, 117-121

Feed

- defined, for feedlot purposes, 164.1(1)
- for livestock or poultry, zero-rated, VI-IV-2, 10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(2), (3)
- for rabbits, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(2)(c)(ii); Finance news release 93-039
- mineral, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(2)(a); Finance news release 93-039
- supplied by feedlot, zero-rated, VI-IV-2.1; Memo 4-4 para. 39

Feeding systems

• agricultural, zero-rated, VI-VI-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(g)(vi.1)

Feeding utensils

 zero-rated as medical devices, VI-II-38; Memo 4-2 paras. 56, 57

Feedlot services

- calculation of consideration, 164.1(2); Memo 4-4 para. 39
- feed zero-rated, VI-IV-2.1; Memo 4-4 para. 39

Fees

- application, for license, quota or permit, V-VI-20(c)
- condominium, exempt, V-I-13; Memo 19-2-2 para. 21
- cooperative housing corporation, exempt, V-I-13.1; Memo 19-2-2 para. 21; Memo 19-2-4 para. 10
- corporate takeover, deemed commercial activity, 186(2); Memo 8-6 paras. 17–26
- dispensing prescription drugs, zero-rated, VI-I-4
- entry, competitive events, 188(3), (4)
- government, exempt, 189.1, V-VI-20
- imposed by federal or provincial legislation, included in consideration, 154; *Taxes, Duties and Fees (GST/HST) Regulations*; TIB B-029
- legal, see Lawyer: services of; Professionals and professional services
- natural resources, 162(1); Policy P-105R, P-110R
- professional, see Professionals and professional services
- tribunal, board or commission, exempt, V-VI-20(g)
- tuition, exempt, V-III-2, V-III-6, V-III-7, V-III-8, V-III-11, V-III-16; Memo 20-1, 20-2, 20-3

Feminine hygiene product

- defined, Deduction for Provincial Rebate (GST/HST) Regulations s. 1
- point of sale rebate, *Deduction for Provincial Rebate* (GST/HST) Regulations:
- • British Columbia, Sch. 4, s. 8 [repealed]
- • Nova Scotia, Sch. 2, s. 8
- • Ontario, Sch. 1, s. 8
- zero-rated, VI-II.1-1

Ferry services

- exempt (domestic), V-VIII-1; Memo 28-1 paras. 2–52; Memo 28-3 para. 36
- zero-rated (international), VI-VII-13; Memo 28-1 paras. 2–52; Memo 28-3 para. 42

Fertilizer

- applicator, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(g)(viii.1); Finance news release 93-039
- meaning of, Policy P-235(obsolete); Memo 4-4 paras. 19-31
- production and marketing of, joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(h)
- zero-rated in bulk, VI-IV-5; Memo 4-4 paras. 18–31; Info Sheet GI-048

Fibre-optic transmission system, *see* Telecommunications facility

Fibre powdered mix

• not zero-rated, Policy P-240

Field sprayer

 zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(g)(viii); Memo 4-4 Schedule

Filing

- · electronically, see Electronic filing
- · frequency, see Reporting period
- joint returns, 228(7)
- of forms, see Election (that can be made); Return

Film, see also Place of amusement

• direct cost of, defined, V-VI-1 [repealed]

Final recipient

 defined, for HST place of supply rules, New Harmonized Value-added Tax System Regulations s. 2

Finance, Department of

• communication of information to, 295(5)(d)(i)

Financial institution, *see also* Financial service(s); Listed financial institution

- acquisition of a business, change-in-use rules, 205(4)–(5)
- allocation of input tax credits, 141.02
- • objection by, 301(1.21)
- allocation of tax between provinces, 225.2; TIB B-083R, see also Selected listed financial institution
- amalgamation involving, 141.02(4), 149(2), 205(6)
- annual information return, see information return (below)
- bad debt on accounts receivable purchased within corporate group, 231(2)
- bank, list of products and services, Memo 17-2
- becoming, change-in-use rules, 205(2)
- · capital property of
- • personal property, 204, 205
- • real property, 206(2)–(5)
- ceasing to be, change-in-use rules, 205(3)
- credit union, Memo 17-8
- de minimis, 149(1)(b); Memo 17-7
- deemed, following election for exempt supplies, 151
- defined, 123(1), 149; Memo 300-4-7; Memo 17-6, 17-7
- election re automobile and aircraft benefits to employees, additional tax, 173(3)(c)
- exports of services zero-rated, VI-IX-1, 2

- GST treatment of products and services, Memo 17-2
- goodwill, sale of, 167.1
- HST special calculation, see Selected listed financial institution
- importation rules, 217.1-220; TIB B-095
- information return required annually, 273.2(1)
- • penalty for wrong or missing information, 284.1
- input tax credit allocations, 141.02; Memo 700-5-1
- interference with remittance of tax, 323.1 (draft)
- lease payments redirected to, remittance of tax, Policy P-131R
- listed, see Listed financial institution
- meaning of "exclusive" and "all or substantially all" for, 123(1) "exclusive", 141(1)–(4)
- multi-province, see Selected listed financial institution
- · registered pension plans and RRSPs
- • rebate to, 261.01; TIB B-XX4
- •• whether an SLFI, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 13, 3(f)
- remittance over \$10,000 required to be made electronically through, 278(3); Memo 7-5 para. 3
- selected listed, see Selected listed financial institution
- services exempt, 123(1)"financial service", V-VII; Memo 17-2
- trust company, list of products and services, TIB B-057; Memo 17-2
- windup into,
- • change-in-use rules, 205(7)
- • input tax credit apportionment after, 141.02(5)

Financial institution's percentage

- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 19, 22–27
- • bank, s. 25
- • corporation, s. 23
- • deferred profit sharing plan, s. 35
- • employee benefit plan, s. 37
- ••• employee life and health trust, s. 37
- • employee trust, s. 37
- • employees profit sharing plan, s. 35
- • exchange-traded fund, ss. 33, 34
- • individual, s. 22
- • insurer, s. 24
- • investment plan, ss. 28–32
- • • non-stratified investment plan, ss. 29, 30, 34, 70
- •••• stratified investment plan, ss. 29, 30, 33, 69
- loan corporation, s. 25
- • pension entity, s. 35
- • qualifying partnership, s. 26
- ••• registered supplementary unemployment benefit plan, s. 37
- • retirement compensation arrangement, s. 35
- trust or loan company, s. 26

Financial instrument

- certificate evidencing, no tax on importation
- • no GST on importation, VII-10
- • no HST on bringing into participating province, X-I-17
- defined, 123(1); Memo 17-1

Financial instrument (cont'd)

• issue, processing, etc. of, constitutes financial service, 123(1)"financial service"(d)

Financial revenue

• defined, 149(1)(b), 149(4.01)

Financial service(s), GST 700, *see also* Financial institution; Insurance

- arranging for, 123(1)"financial service"(l); Policy P-239 Example 7
- · automated bank machine, Info Sheet GI-006
- barter exchange network activities excluded, 181.3(6)
- · capital property used in supply of, 198
- clearing services, see Clearing and settlement services
- combined supply including, 139
- deemed made, by tax refund discounter, 158(b)
- defined, 123(1); Financial Services and Financial Institutions (GST/HST) Regulations; TIB B-017, B-057, B-105; Memo 17-1-1, 17-2, 17-2-3
- • amendments in 2010, TIB B-105
- election to deem intra-group supplies to be, 150
- excluded from definition of "commercial service", 123(1)"commercial service"(b); Policy P-151
- excluded from small supplier threshold, 148(1), 148(2)
- exempt, V-VII
- exported, zero-rated, VI-IX; Memo 300-3-9
- Harmonized Sales Tax (HST), TIB B-083R, see also Selected listed financial institution
- insurer, of, Memo 17-2-3
- investment dealer, of, Memo 17-1-1
- membership supplied with share, deemed not to be, 140
- · mutual fund trailer commission servicing fees, Policy P-119
- non-financial institution, of, 185, 198
- of individual, 185(2)
- pawnbrokers, Policy P-129
- redemption of coupon, deemed not to be, 181(1)
- settlement services, see Clearing and settlement services
- stockbroker, of, Memo 17-1-1
- trust company, of, TIB B-057
- · zero-rated, VI-IX
- excluded from small supplier threshold, 148(1)(a), (2)(a); Policy P-035

Fines, see Offences; Penalties

Finished inventory

- defined, for export distribution centres, 273.1(1)
- percentage total value added, 273.1(3)
- percentage value added attributable to non-basic services, 273.1(2)

Fire commission, may apply to be municipality, 123(1)"municipality"(b); TIB B-046

Fire department, see Para-municipal organization

Fire hydrant, relocation of, exempt, V-VI-21, Policy P-177R

Fire protection service supplied to government or municipality, V-VI-20(g)

Firewood, see Wood

First buyer (of continuous transmission commodity)

• defined, VI-V-15.1

First home savings account

 constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(iv.2)

First Nations, see Indians and Indian bands

First seller (of continuous transmission commodity)

· defined, VI-V-15.1

First supplier (of tour package)

- deemed, HST transitional rule, 163(2.2)
- defined, 163(3)

First-time homebuyer

• Nova Scotia new housing rebate limited to, 254(2.1)(b)(i), 254.1(2.1)(b)(i), 255(2.1)(b)(i), 256(2.1)(c)(i)

First use

• defined, for new residential housing rebate, 256.2(1)

First variant year

• defined, 236.5(1)(a)

Fiscal month, Memo 500-2-1

- as reporting period, 245(2)(b), 246
- election for HST transitional year, 363.1(a), (b)(i); New Harmonized Value-added Tax System Regulations s. 57
- chosen by registrant, 243(2); GST Form 71
- • criteria for acceptance by CRA, Policy P-008
- defined, 123(1), 243(2)
- determination by Minister, 243(4)

Fiscal quarter, Memo 500-2-1

- as reporting period, 245(2)(c), 247, 249(2)
- e election for HST transitional year, 363.1(b)(ii), New Harmonized Value-added Tax System Regulations s. 57(b)(ii)
- chosen by registrant, 243(1); GST Form 71
- defined, 123(1), 243(1)
- determination by Minister, 243(4)

Fiscal year, Memo 500-2-1

- as reporting period, 245(2)(a), 248, 249(1)
- • automatic for new registrants, 245(2)(a)(ii); TIB B-072
- • instalments required, 237; Memo 500-2-1
- defined, 123(1), 244; Policy P-068
- • for segregated fund or investment plan that is SLFI, 244.1
- partner, of, 244(2)
- to be calendar year, election, 244(1)
- to be fiscal period of business, election, 244(2)

Fishing, see also Agriculture and fishing, zero-rated

- · bait, see Bait
- equipment, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:2(2), (3); Info Sheet GI-049
- fish, zero-rated, VI-III-1, VI-IV-8; Memo 4-3, para. 5, 4-4 para. 34; Info Sheet GI-049
- fish eggs, for hatching, zero-rated, VI-IV-4; Memo 4-4 para.
 17; Info Sheet GI-049
- licence
- • commercial, not taxed, 162(1); Policy P-105R, P-110R
- • consumer, taxable, 146(b), (c), V-VI-20(j)

Fishing (cont'd)

- marine animals, zero-rated, VI-IV-8; Memo 4-4 para. 34
- · mounts, Info Sheet GI-047
- nets and equipment, zero-rated, Agriculture and Fishing Property (GST/HST) Regulations Sch:2(2), (3); Info Sheet GI-049
- package, whether eligible for non-resident rebate, Info Sheet GI-046
- vessel, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:2(1); Info Sheet GI-049
- zero-rating, VI-IV; Memo 4-4

Fixed place of business

meaning of, Policy P-208R

Fixtures, jigs, molds, dies and tools

 supplied to non-resident, zero-rated, VI-V-14; Memo 4-5-2 paras. 46, 47

Flavoured ice waters, taxable, VI-III-1(j); Memo 4-3 paras. 71–73

Flax seed, zero-rated, VI-IV-3; Memo 4-4 para. 15

Flight instruction, whether exempt, V-III-8; Memo 20-4

Flights, see Charter flights; Passenger transportation service

Floating home

- · British Columbia HST, Info Sheet GI-081
- constitutes personal property for certain rules, 142(3)(a), 220.01, VI-V-24, IX-I-2; Memo 4-5-2 para. 50; Memo 19-1 paras. 48–50
- constitutes real property, 123(1)"real property"(c)
- constitutes residential complex, 123(1)"residential complex"(e)
- constitutes residential unit, 123(1) "residential unit" (a)
- construction of, timing rule, 190.1(1)
- defined, 123(1); Memo 19-2 paras. 7-8
- excluded from FST new housing rebate, 121(1)"specified single unit residential complex"
- mooring facilities, right to use exempt, V-I-13.2; Memo 19-2-2 para. 22
- new housing rebate, 254(2), 256(2.2)
- Ontario HST, Info Sheet GI-082
- PEI HST, Info Sheet GI-145
- parking space leased to owner or occupant, V-I-8.1(c); Memo 19-2-2 para. 20
- removed from HST province, rebate of provincial tax, 261.1;
 TIB B-080
- substantial renovation of, timing rule, 190.1(2)
- supplier of, 123(1)"builder"(c)
- used, no HST, X-I-25
- wharf, right to use exempt, V-I-13.2; Memo 19-2-2 para. 22

Floor space, prescribed for new housing rebate,

121(1)"estimated federal sales tax"; Federal Sales Tax New Housing Rebate Regulations; TIB B-016

Flowers

- supplied by auction, election, 177(1.3); Property Supplied by Auction (GST/HST) Regulations s. 1(a)
- taxable, Memo 4-4 para. 2

Fluoroscopy, see Radiological services

Fodder crops, zero-rated, VI-IV-2; Memo 4-4 para. 9; Info Sheet GI-107

Foliage, taxable, Memo 4-4 para. 2

Fondue chocolate, Policy P-079R

Food, see also Meals; specific names of foods that are not zerorated

- allowance or reimbursement for, Memo 9-3 para. 53; Memo 9-4 para. 38; Memo 400-3-3
- and Drugs Act and Regulations, drugs listed under, see Drugs
- basic groceries, zero-rated, VI-III-1; Memo 4-3
- expenses, input tax credit limited to 50%, 236(1); Memo 8-2 paras. 50-67
- • exception for charities, 236(2)
- • special rule for long-haul truck drivers, 236(1)(b)(ii)
- expenses, Ontario/BC HST input tax credit denied to large business, 236.01; *New Harmonized Value-added Tax System Regulations, No.* 2, s. 28(1)(h)
- gift basket, whether zero-rated, Memo 4-3 paras. 163-164
- prepared, see Prepared food
- supplied by public sector body
- for poor, aged, disabled, etc., exempt, V-V.1-4, V-V.1-5.2, V-VI-14, V-VI-15
- · supplied by school authority
- • in extra-curricular activities, exempt, V-III-3
- in school cafeteria, exempt, V-III-12; School Cafeteria Food and Beverage (GST/HST) Regulations; Memo 20-5; TIB B-026
- supplied to educational institution, exempt, V-III-14; Memo 20-5
- supplied to hospital, exempt, V-II-11
- zero-rated, rules and exceptions, VI-III-1; Memo 4-3

Food and Drugs Act and Regulations, drugs zero-rated, VI-I-2

Foo

- artificial, zero-rated, VI-II-22; Memo 4-2 para. 38
- crippled, appliance made to order, zero-rated, VI-II-24; Memo 4-2 para. 40

Footwear

- children's, provincial point-of-sale rebate, *see* Children's clothing
- for person with crippled or deformed foot, zero-rated, VI-II-24.1; Memo 4-2 paras. 41, 42

Forage mixture, zero-rated, Memo 4-4 para. 13

Forces, see Armed forces

Foreign bank, see Authorized foreign bank

Foreign bank branch

- conversion of subsidiary to, 167.11
- defined, 167.11(1)
- permitted to register for GST, 240(3)(e)

Foreign carrier, supplies to, zero-rated, VI-V-2, 2.1; Memo 4-5-2 paras. 21–25; Memo 4-5-3 paras. 27–31; Policy P-076

Foreign convention, see Convention: foreign

Foreign Convention and Tour Incentive Program

- domestic conventions, no tax on admission to non-resident, 167.2; Info Sheet GI-027
- · foreign convention rebates
- • paid to sponsor by organizer, 252.4(2); Info Sheet GI-031
- • rebate to sponsor, 252.4(1), (2); Info Sheet GI-029
- • rebate to non-resident exhibitor, 252.3; Info Sheet GI-028
- • rebate to unregistered organizer, 252.4(3); Info Sheet GI-030

Foreign Convention and Tour Incentive Program (cont'd)

- rebate to non-resident tour operator [before 2018], 252.1(3);
 Info Sheet GI-033
- rebate to non-resident purchasing tour package [before 2018], 252.1(2); Info Sheet GI-032

Foreign currency, value of consideration expressed in, 159; Memo 3-6

Foreign government

- aircraft operated for, supplies to carrier zero-rated, VI-V-2(b); Memo 4-5-2 paras. 21–25; Memo 4-5-3 paras. 27–31
- communication of information to permitted, 295(5)(b)
- diplomats of, see Diplomats
- ship operated for, supplies to carrier zero-rated, VI-V-2(b); Memo 4-5-2 paras. 21–25; Memo 4-5-3 paras. 27–31
- tourist literature imported by, no tax on importation
- • no GST on importation, VII-3(a)
- • no HST on bringing into participating province, X-I-12(a)
- · visiting forces of, see Visiting forces

Foreign indicator

• defined, for non-resident e-commerce, 211.11(2)(b)

Foreign university

• whether a "university", Memo 20-3

Foreign-based information or document

- defined, 292(1)
- failure to provide, 292(8)
- requirement to provide, 292(2)

Forestry products or resources, right to, 146(c), 162, V-VI-20(k); Policy P-110R

Forfeiture of deposit, 182

Forgiveness of debt

- retransfer of security interest, not a supply, 134; Policy P-115, P-120, P-122
- under Companies' Creditors Arrangement Act, treated as bad debt, Policy P-084R

Form

- false statement in, penalty, 285
- prescribed, see Prescribed: forms

Former spouse

• defined, 123(1)

Formulas

- negative amounts in, 125
- run amok, 123(1)"basic tax content", 363(2)

Formulated liquid diet product

• zero-rated, Memo 4-3 paras. 160-161

Foster care service, in Ontario, Info Sheet GI-123

Foundations for mobile homes, Policy P-070R

Fox, taxable, Memo 4-4 para. 7

Fraction, see Consideration: fraction; Tax: fraction

Fractions of a cent (of tax), 165.2(2)

Frames

• for prescription eyeglasses, zero-rated, VI-II-32

Franchise

• fees, normally taxable [no exempting provision]

• sale of, whether taxable, 167(1), (1.1); Memo 14-4 paras. 21–23

Fraud, see also Offences; Penalties

• no time limit for reassessment, 298(4)(b)

Free supplies

- exempt, V-V.1-5, V-VI-10
- made to further or promote another endeavour, 141.01(4);
 Memo 8-3 para. 30

Freedom of information legislation

 fees paid to government or municipality under, exempt, V-VI-20(f)

Freight forwarders

 services provided to non-resident, zero-rated, VI-VII-12; Memo 28-2 paras. 91–98

Freight transportation service, VI-VII; Memo 28-2; TIB B-055, *see also* Carrier

- declaration by shipper for zero-rating, VI-VII-7(a); Memo 28-2 Appendix
- defined, VI-VII-1(1), IX-VI-1; Memo 28-2 para. 15; Policy P-050 (obsolete)
- dump truck operators and gravel pit owners, Policy P-157; Memo 28-2 paras. 54–55
- HST o
- • destinations in two provinces, 136.3; Memo 28-2 para. 78
- • place of supply, see Place of supply: province
- • transitional rules, 359; TIB B-077
- inbound (to Canada), zero-rated, VI-VII-8, 9, 10; Memo 28-2 paras. 68–71
- incidental services relating to, Memo 28-2 paras. 27-39, 53
- included in price of goods, 138; Policy P-159R1, P-160R
- interline settlements, zero-rated, VI-VII-11; Memo 28-2 paras. 44-62
- international carrier, sale of fuel to zero-rated, VI-V-2, 2.1; Memo 4-5-2 paras. 21–25; Memo 4-5-3 paras. 27–31; Policy P-006, P-076
- international freight forwarding, zero-rated, VI-VII-12; Memo 28-2 paras. 91–98
- international shipping corporation, deemed non-resident, 132(5)
- loading services, Memo 28-2 paras. 22, 24, 30
- outbound (from Canada), zero-rated, VI-VII-6, 7; Memo 28-2 paras. 63-67
- packing services, Memo 28-2 paras. 31-32
- person who supplies, 123(1)"carrier"
- provided by subcontracted carrier, VI-VII-11; Memo 28-2 paras, 44-62
- reload centre, services at, Memo 28-2 paras. 21–22; Policy P-050
- separate supplies, deemed, 136.3; Memo 28-2 para. 78
- shunting services, Memo 28-2 para. 23
- stevedoring, Memo 28-2 paras. 24-25
- towing services, Memo 28-2 para. 6
- water, exempt, V-VI-23; Info Sheet GI-011

French language instruction, exempt, V-III-11; Memo 20-7

Frequency of filing, see Reporting period

Freshwater animals, zero-rated, VI-IV-8; Memo 4-4 para. 34

Fringe benefits, 170, 173; Memo 9-1

Frozen ices, taxable, VI-III-1(j); Memo 4-3 paras. 71-73

Frozen pudding, single serving taxable, VI-III-1(k), (o)(v); Memo 4-3 para. 74

· whether packaged/sold in single servings, Policy P-213

Frozen yoghurt, single serving taxable, VI-III-1(k), (o)(v); Memo 4-3 paras. 74–84

Fruit

- bars, taxable, VI-III-1(1); Memo 4-3 paras. 85-86
- coated with chocolate, sugar, etc., taxable, VI-III-1(e); Memo 4-3 paras. 45–54
- · drinks and fruit juices, see Beverages
- drops, taxable, VI-III-1(1); Memo 4-3 paras. 85–86
- picker or harvester, zero-rated, VI-IV-10; *Agriculture and Fishing Property (GST/HST) Regulations* Sch:1(1)(b)(vii); Finance news release 93-039
- prepared platters of, taxable, VI-III-1(o.3); Memo 4-3 paras. 114–118
- rolls, taxable, VI-III-1(1); Memo 4-3 paras. 85-86
- snack foods, not-zero-rated, VI-III-1(l); Memo 4-3 paras. 85–86
- · zero-rated, generally, VI-III-1

Fuel

- · British Columbia HST
- • point-of-sale rebate, *Deduction for Provincial Rebate* (GST/HST) Regulations Sch. 4, s. 10 [repealed]
- excise tax on, I-9, I-9.1; Memo 800-1
- • rates of, historical list, Memo 800-4
- • transportation rebate program, 68.4; Memo 800-1 paras. 21–23
- excluded from non-resident business rebate for goods exported, 252(1)(c)
- export of, evidence of, Memo 4-5-2 Appendix A.2.B
- FST inventory rebate, Federal Sales Tax Inventory Rebate Regulations ss. 3(b), (c), 4(a)B(i)
- provided to registered carrier for use in international transportation, zero-rated, VI-V-2.1; Memo 4-5-2 paras. 24, 25; Policy P-006
- provided to unregistered foreign carrier, zero-rated, VI-V-2; Memo 4-5-3 paras. 27–31; Policy P-076

Fuel-inefficient vehicle

excise tax on, I-6

Fulfillment warehouse, *see also* Qualifying tangible personal property supply

- · required to notify CRA of sales by non-residents, 211.24
- sales through, non-resident required to register for GST/HST, 211.22(2)

Functional relationship

• between imported goods and commercial service, Policy P-151

Funding by government

- effect on input tax credit eligibility, 141.01(1.2); Memo 8-1 paras. 28–30
- · government funding, defined
- • of a particular person, Public Service Body Rebate (GST/HST) Regulations s. 2
- • of a residential complex, 191.1(1)
- included in gross revenue calculation for charities' small supplier threshold, 148.1(1)(a)(ii)
- is not a supply, 123(1)"supply"

- non-profit organization, for rebate, 259(1)"percentage of government funding", 259(2); *Public Service Body Rebate (GST/HST) Regulations* s. 3; TIB B-025
- public college, 123(1)"public college"(a); Memo 20-2
- subsidized housing, self-supply calculation, 191.1
- transit authority, V-VI-1"transit authority"(b)(i)

Fund-raising

- activities by charity, exempt, V-V.1-3
- event
- • charity, whether exempt, V-V.1-2, V-VI-2(m)(iii)
- donation included in consideration for supply, V-V.1-2, V-VI-3, 18
- excluded from exemption for supplies for relief of poverty or distress, V-V.1-5.2, V-VI-14
- sales by volunteers, exempt, V-V.1-3, V-VI-3.1, V-VI-4

Funeral services (prepaid), see also Burial

- defined
- • for GST 1997 transition, 344(1)
- • for HST 1997 transition, 360(1)
- • for HST 2010 transition, New Harmonized Value-added Tax System Regulations s. 47(1)
- • for HST 2013 transition, New Harmonized Value-added Tax System Regulations s. 58.29(1)
- Nova Scotia 2010 transition, Nova Scotia HST Regulations s, 1(1)
- timing of GST application, TIB B-091
- · transitional rules
- GST, 344
- • HST (1997), 360; TIB B-077
- • HST (2010), New Harmonized Value-added Tax System Regulations s. 47; Info Sheet GI-074
- • Nova Scotia HST (2010), Nova Scotia HST Regulations s. 19(3)(g)
- • PEI HST (2013), New Harmonized Value-added Tax System Regulations s. 58.29; Info Sheet GI-142
- • substitution of supplier, Policy P-071R (obsolete)

Fungible property

• for drop-shipment rules, 179(7.1)

Fur and animal hides, taxable, Memo 4-4 para. 2

Fur-bearing animals, taxable, Memo 4-4 para. 7

Furniture

• not considered part of mobile home, 123(1)"mobile home"

Futures contract, constitutes financial instrument, 123(1)"financial instrument"(f)

Fyber

• not zero-rated, Policy P-240

G

GAAR, see General anti-avoidance rule

GST application rulings, Memo 1-4

GST Credit, see Income Tax Act s. 122.5 (not a GST measure)

GST-extra or GST-inclusive, *see* Tax-extra or tax-inclusive pricing

GST/HST NETFILE, see Electronic filing

Gallery, see Art gallery

Gambling, see Bets

Game of chance, Memo 500-6-10, see also Bets; Competitive event

- betting on, 187
- defined, 123(1)
- non-commercial, admission exempt, V-V.1-6, V-VI-5
- prescribed registrant (lottery corporation), supplies by, 188(5);
 Games of Chance (GST/HST) Regulations; TIB B-018
- prizes paid out, 188(1)
- • excluded from small supplier threshold calculation, 148
- supply of right to play in, by charity, whether exempt, V-V.1-1(i), V-V.1-3(c), V-VI-3.1(c), V-VI-2(k), 5.11; Games of Chance (GST/HST) Regulations s. 4; TIB B-018

Games and toys, holiday relief from GST 2024–25, VI-XI

Gaming activitydefined, Games of Chance (GST/HST) Regulations s. 5(1)

Gaming machine

- certain supplies not taxed, 188.1(4)(a.1), (a.2)
- defined, 188.1(1)
- specified gaming machine supply, defined, 188.1(1)

Garbage collection services

- exempt, V-VI-20(h)
- · meaning of, Policy P-199R

Garnishment (of amounts payable to tax debtor), 317; Memo 500-3-3

• province, amounts payable by, 317(12)

Gas

- natural, see Continuous transmission commodity; Natural gas
- petroleum, see Gasoline
- storage charges, Policy P-074

Gasoline, see also Fuel

- British Columbia HST
- defined, Deduction for Provincial Rebate (GST/HST) Regulations s. 1
- • point-of-sale rebate, *Deduction for Provincial Rebate* (GST/HST) Regulations Sch. 4, s. 10 [repealed]
- excise tax on, I-9; Memo 800-1
- • rates of, historical list, Memo 800-4
- • refund of, 68.16; Memo 800-1 paras. 19-20
- excluded from non-resident business rebate for goods exported, 252(1)(c)

Gastro-intestinal tube

• zero-rated as medical device, VI-II-5.2; Memo 4-2 para. 10

Gay couples, see Common-law partner

Geese

- down, taxable, Memo 4-4 para. 2
- zero-rated, VI-IV-1; Memo 4-4 para. 5

Gelatine

- flavoured, taxable in single servings, VI-III-1(n); Memo 4-3 para. 27
- salad, whether taxable, VI-III-1(0.1); Memo 4-3 paras. 105, 108

General anti-avoidance rule, 274; TIB B-045; Memo 16-4

General retail sales tax rate

• defined, Taxes, Duties and Fees (GST/HST) Regulations s. 2(1)

General sales tax rate

• defined, Games of Chance (GST/HST) Regulations s. 5(1)

Generation of electricity

• joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(e)

Gift, see also Donation

- basket of food, whether zero-rated, Memo 4-3 paras. 163-164
- · certificate
- • meaning of, Policy P-202
- • used as consideration, 181.2
- constitutes supply, 123(1)"supply"
- from non-HST province to HST province, under \$60, no HST, X-I-6
- from outside Canada, non-taxable up to \$60, VII-1, *Customs Tariff* 98.16
- · non-arm's length, deemed fair market value, 155
- · to charity or political party
- excluded from consideration for supply, V-V.1-2, V-VI-3,
- • included in gross revenue calculation for small supplier threshold, 148.1(1)(a)(i)
- to performer or athlete, effect on exemption for supply of admission to event, V-VI-11

Ginger ale, see Carbonated beverages

Gingerbread houses

• zero-rated, Memo 4-3 para. 45 (footnote)

Ginseng, taxable, VI-III-1; Memo 4-3 para. 150

Glasses and contact lenses, zero-rated, VI-II-9; Memo 4-2 para.

Goats, zero-rated, VI-IV-1; Memo 4-4 para. 5

Gold bars, see Precious metal

Golf club securities, Policy P-098R

Goods, see also Personal property; Tangible personal property

- damaged or defective, rebate after importation, 215.1(1)
- defined to follow Customs Act, 123(1)
- delivered in participating province, HST applicable, IX-II-1; TIB B-077
- exported, see also Exports
- • by non-resident business, rebate for, 252
- • from HST province, rebate, 261.1; TIB B-080
- • supply outside Canada, not taxed, 142(2)(a), 165(1); Policy P-078R
- zero-rated, VI-V
- for use in commercial activity, no HST, X-I-22
- HST on, see Harmonized Sales Tax
- held in bond by Canada Customs
- • supply of, 144
- transportation of, VI-VII-1(1)"place outside Canada", VI-VII-6, 8, 9, 10
- importation of, tax on, 212-216; Memo 300-8
- • in non-HST province by HST resident, rebate, 261.2
- • input tax credit, 169(1), 169(2)
- provincial portion of HST, 212.1, 220.06; TIB B-079, TIB B-081, B-XX5
- in inventory, FST rebate for (transitional), 120(2)

Goods (cont'd)

- in transit, not subject to HST, 220.03
- no FST after 1990, 118(1)
- non-taxable importations, 213, Sch. VII
- not expected to be sold, no FST inventory rebate, 120(2.1)
- processing for non-resident, 213.2, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(d)
- removed from participating province, rebate, 261.1; TIB B-080
- returned after 1990, transitional rule, 337(9) [repealed]; TIB B-034
- returned after importation on consignment, rebate, 215.1(2)–(3)
- seizure of for non-payment of tax, 321, 322
- fax on
- • on bringing goods into HST province from non-HST province, 220.05; TIB B-079, B-XX5
- • on importation from outside Canada
- • federal tax, 212
- • provincial tax, 212.1, 220.06, 349(3); TIB B-081, B-XX5
- taxable supply of, 165(1)
- tax-paid, defined (for FST rebate), 120(1)
- transitional rules for HST, see Transitional rules (HST)

Goods and services tax, see everywhere

Goods and Services Tax Credit, see Income Tax Act s. 122.5 (not a GST measure)

Goodwill

- · sale of
- excluded from sales for reporting period frequency, 249(1)(a)A, 249(2)(a), (b)
- • excluded from sales for small supplier threshold, 148(1)(a), (2)(a)
- • whether taxable, 167.1; Memo 14-4 para. 26

Government, see also Municipality; Provinces and provincial law; Public sector body

- capital personal property, sale of, 200(4)
- constitutes public sector body, 123(1)"public sector body"
- deemed not non-profit organization, 123(1)"non-profit organization"
- defined, 123(1)
- excluded from acting as operator in joint venture election, 273(1.1)
- excluded from non-profit organization status, 123(1)"non-profit organization"
- federal, see Federal government
- fees, exempt, 189.1, V-VI-20
- foreign, see Foreign government
- funding, see Funding by government
- obligations to pay and collect tax, 122; Specified Crown Agents (GST/HST) Regulations; TIB B-006, B-036
- organization, prescribed provincial, 259(1)"non-profit organization"
- projects with U.S., Joint Canada-United States Government Projects Remission Order
- provincial, application of GST, 122; TIB B-006; Memo 400-4; Memo 18-2
- rebate of GST paid, GST Federal Government Departments Remission Order
- sale of capital personal property, 200(4)
- services, exempt, V-VI-20, 21, 22, 23

- subsidized housing, calculation of self-supply tax, 191.1
- · supplies by
- • exempt, V-VI-4, 5, 8-15, 19-24
- • standard services, exempt, V-VI-20, 21, 22, 23
- • taxed, 146

Government entity

• defined, re disclosure of confidential information, 295(1)

Governor General, supplies for use of, zero-rated, VI-VIII-1 [repealed]

Grain handling or processing equipment, zero-rated, VI-IV-10, *Agriculture and Fishing Property (GST/HST) Regulations* Sch:1(1)(f); Memo 4-4 Schedule

Grains, when zero-rated, VI-IV-2; Memo 4-4 para. 9; Info Sheet GI-107

Grandfathered residence

• for HST, 351(1), (2)

Grandfathering dates

- Harmonized sales tax (HST)
- • 1997 implementation, 348; TIB B-077
- • 2010 implementation (Ontario, BC)
- ••• residential property, *New Harmonized Value-added Tax System Regulations*, *No.* 2, ss. 48(1)"qualifying date", 51(1), 52(1), 53(1)
- • 2013 implementation (PEI)
- ••• residential property, New Harmonized Value-added Tax System Regulations, No. 2, ss. 58.04(1), 58.05(1), 58.06(1)
- instalment sales October 31, 1989, 118(3)–(5)
- leases
- • automobiles December 31, 1990, 340(3)(a)
- • general August 7, 1989, 340(6), (7)
- • health care equipment December 31, 1990, 340(3)(b)
- newspapers and magazines December 31, 1990, 337(4)
- property delivered before 1991 April 30, 1991, 337(1)
- residential property October 13, 1989, 336(2)–(5)
- · services
- • performed after 1990 August 31, 1990, 341(3)
- • performed before 1991 April 30, 1991, 341(1), (2)
- subscriptions December 31, 1990, 337(4)

Granola products, when zero-rated, VI-III-1(h); Memo 4-3 paras. 46, 62–65; Info Sheet GI-021

Granto

• defined, 191.1(1); Public Service Body Rebate (GST/HST) Regulations s. 2

Grants by government, see Funding by government

Grape juice, see Juice: grape

Gratuities

• not taxed where voluntary, 153 (Q & A)

Gravel

- constitutes mineral, 123(1)"mineral"
- pit owners, dump truck operator charges not interlining, Policy P-157 (obsolete); Memo 28-2 paras. 54–55
- taxable, Memo 4-4 para. 2

Grazing land, lease of, election, 211(1); Memo 4-4 paras. 37–38; Non-Profit Grazing Associations (GST/HST) Remission Order

Gripping device, designed for disabled persons

• zero-rated, VI-II-38; Memo 4-2 paras. 56, 57

Groceries

- · defined
- • basic groceries, Streamlined Accounting (GST/HST) Regulations ss. 2(1), 15(1)
- simplified accounting, 227(1); Streamlined Accounting (GST/HST) Regulations ss. 3–10 [repealed]; Memo 600-1
- zero-rated, VI-III; Memo 4-3

Gross compensation

• defined, 285.1(1), (12)(c)

Gross entitlements

- · defined
- • for tax-debt avoidance penalty, 285.03(1)
- • for third-party penalty, 285.1(1)

Gross negligence penalty, 285

Gross revenue

- defined
- • for charity small supplier threshold, 148.1(1)
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 16(1), 20(a)

Ground lease, see Land: lease of

Group care (residential), in Ontario, Info Sheet GI-123

Group insurance

- arranging for, meaning of, Policy P-239 Example 7
- policyholder in corporate group, premiums paid to, Policy P-161 (obsolete), P-182R

Group registration, see also Registration (for GST/HST)

• group of selected listed financial institutions, 241(1.1)–(1.2)

Groups of individuals

• application for non-resident rebate for accommodation, 262(3)

Guarantee, see also Construction: bond; Warranty

 in respect of financial instrument, 123(1)"financial instrument"(h), 123(1)"financial service"(e); Memo 17-1 para.

Guardian, see Receiver

Guide dog, supply of and training individual to use

zero-rated, VI-II-33, VI-II-33.1 [repealed]; Memo 4-2 paras.
 49, 50

Guitar lessons, exempt, V-III-9; Equivalent Courses (GST/HST) Regulations; Memo 20-6; TIB B-014

Gum (chewing), taxable, VI-III-1(e); Memo 4-3 para. 45

Gumball machines, calculation of tax, 165.1(2)

н

HST, see Harmonized Sales Tax

Hamlet, see Municipality

Hand, artificial, zero-rated, VI-II-22; Memo 4-2 para. 38

Handicapped, see Disabled person or disabled individual

Handling charges

• on certain non-GST-taxable importations, VII-3, 5

 on certain non-HST-taxable bringing into HST province, X-I-12, 14

Harbour authorities, Info Sheet GI-008

Harmonization date

• defined, 123(1)

Harmonized provinces

• defined, for 2013 PEI transitional rules, *New Harmonized Value-added Tax System Regulations* s. 38(1)

Harmonized Sales Tax

- application of, see Place of supply: province
- bringing into participating province, see Bringing into a participating province
- double taxation, relief from, 261.1, 261.2; TIB B-080
- exemptions, Sch. X; TIB B-081
- financial institution rules, see Selected listed financial institution
- freight transportation service, 136.3; Memo 28-2 paras. 74-77
- goods for use in commercial activity, X-I-22
- goods not subject to tax, Sch. X; TIB B-081, see Point of sale rebates: HST provincial portion
- · imposition of
- • federal portion, 165(1), 212, 218
- provincial portion, 165(2), 212.1, 218.1, 220.05–220.08; TIB B-079, TIB B-081, B-XX5
- intangible property for use in commercial activity, X-II-1
- non-taxable goods, see Point of sale rebates: HST provincial portion
- place of supply rules, see Place of supply: province
- point of sale rebates, see Point of sale rebates: HST provincial portion
- provinces applicable, see Participating province
- rate, see Tax rate (for HST provinces)
- rebate of provincial portion, TIB B-080, see Point of sale rebates: HST provincial portion
- • goods imported in non-HST province by HST resident,
- • goods removed from participating province, 261.1; TIB B-080
- intangible property not for use in participating province, 261.3; TIB B-080
- new housing (Nova Scotia), 254(2.1), 254.1(2.1), 255(2.1), 256(2.1); Memo 19-3-8
- • new housing (Ontario), New Harmonized Value-added Tax System Regulations, No. 2, ss. 40–47
- public service bodies, 259(3)(b), 259(4)(b)
- service not for use in participating province, 261.3; TIB B-080
- regulations, 277.1
- self-supply rules, 220.05-220.08; TIB B-079, B-XX5
- • assessment, 296(1)(b), 298(1)(d.1)
- service for use in commercial activity, X-II-1
- temporary input tax credit recapture (Ontario/BC), 236.01; New Harmonized Value-added Tax System Regulations, No. 2, ss. 26–38
- · tour packages
- • Ontario/BC, Info Sheet GI-071
- • PEI, Info Sheet GI-143

Harmonized Sales Tax (cont'd)

- transitional rules, see Transitional rules (HST, 1997);
 Transitional rules (HST, 2010);
 Transitional rules (HST, 2013)
 in PEI
- whether applies, see Place of supply: province

Harrows, zero-rated, VI-IV-10, *Agriculture and Fishing Property (GST/HST) Regulations* Sch:1(1)(c)(xii); Memo 4-4 Schedule

Harvesting

- equipment, zero-rated, VI-IV-10, *Agriculture and Fishing Property (GST/HST) Regulations* Sch:1(1)(b); Memo 4-4 Schedule
- services, taxable, Memo 4-4 para. 3

Hawaii, air travel to zero-rated, VI-VII-1(1)"taxation area", VI-VII-3(a); Memo 28-3 para. 18

Hay, when zero-rated, VI-IV-2; Memo 4-4 paras. 9, 14.1; Info Sheet GI-107

 quantities larger than ordinarily sold to consumers, Memo 4-4 para. 14.1

Haying equipment, zero-rated, VI-IV-10, *Agriculture and Fishing Property (GST/HST) Regulations* Sch:1(1)(e); Memo 4-4 Schedule

Head lease, exempt, V-I-6.1, 6.11, 7

· residential care facility, V-I-6.11; Info Sheet GI-045

Headstone, see Funeral services (prepaid)

Health care facility

- · defined, V-II-1
- food services supplied to, for patients or residents, exempt, V-II-11
- institutional health care services, exempt, V-II-2
- medical equipment lease, exempt, V-II-3

Health care professional, see Practitioner

Health care services, exempt, V-II; Memo 300-4-2

- acupuncturist, V-II-7(1)
- ambulance, V-II-4, VI-VII-15
- audiologist, V-II-7(g)
- chiropodist, V-II-7(d)
- chiropractor, V-II-7(b)
- clinic, V-II-2
- cosmetic service supply excluded, V-II-1.1
- cosmetic surgery not exempt, V-II-2, 5; Memo 300-4-2 paras. 12–14
- dental hygienist, V-II-8
- dentist, V-II-5; Policy P-238
- dietitian, V-II-7.1
- generally, V-II; Memo 300-4-2
- home care service, V-II-13
- homemaker, V-II-13
- hospital, V-II-2
- institutional, V-II-2
- insurance report excluded, V-II-1.2
- laser eye surgery, V-II-5; Policy P-207
- licensed practical nurse, V-II-6
- medical doctor, V-II-5; Policy P-238
- medical equipment lease, 340(3)(b), V-II-3
- medical-legal report excluded, V-II-1.2

- multidisciplinary, V-II-7.4
- naturopath, V-II-7(m); TIB B-109
- non-health purpose excluded, V-II-1.2
- nurse, V-II-6
- nursing assistant, V-II-6
- nursing home, V-II-2
- occupational therapist, V-II-7(i)
- optometrist, V-II-7(a)
- osteopath, V-II-7(f)
- pharmacist, V-II-7.3
- physician, V-II-5
- physiotherapist, V-II-7(c)
- podiatrist, V-II-7(e)
- prescribed, V-II-10; Health Care Services (GST/HST) Regulations; TIB B-019
- psychoanalyst, V-II-12 [repealed]
- psychologist, V-II-7(j)
- qualifying health care supply requirement, V-II-1.2
- social worker, V-II-7.2
- speech therapist, V-II-7(h)
- speech-language pathologist, V-II-7(h)
- surgeon, V-II-5
- therapy
- •• group, V-II-2, V-II-5, V-II-7(j), V-II-7.2
- • occupational, V-II-7(i)
- • psychotherapy, V-II-2, V-II-5, V-II-7(j), V-II-7.2
- • speech, V-II-7(h)

Health insurance, 123(1)"insurance policy"(b)

• public, services paid by, exempt, V-II-9

Health Products Safety Act

• drugs zero-rated, VI-I-2

Hearing aid, zero-rated, VI-II-12; Memo 4-2 para. 20

Hearing-ear dog, *see* Guide dog, supply of and training individual to use

Hearing impairment

- communication device for telephone, zero-rated, VI-II-2; Memo 4-2 para. 1
- converter of sound to light signals, VI-II-7; Memo 4-2 paras.
 12. 13
- guide dog for, see Guide dog, supply of and training individual to use
- hearing aid, VI-II-12; Memo 4-2 para. 20

Hearing officer, inquiry by, 276

Heart monitoring device, zero-rated, VI-II-3; Memo 4-2 paras. 2, 3

Heated foods, taxable, VI-III-1(o); Memo 4-3 paras. 101-103

Hectare, 1/2, *see also* Quantities: land allowed for residential complex

Hemp, see Industrial hemp

Herb cold and flu inhibitor

• not zero-rated, Policy 240

Herbal supplements

• not zero-rated, Policy P-240; Info Sheet GI-001

Herbs, zero-rated, VI-III-1

Heroic deeds, prizes for

- no GST on importation, VII-2
- no HST on bringing into participating province, X-I-11

High school, see Educational services; School: authority

Highway, see Road

Highway sufferance warehouse services, *see* Sufferance warehouse services, zero-rated

Hip prosthesis, see Prosthesis, medical or surgical

Historical list of excise tax rates, Memo 800-4

Historical site, see Place of amusement

Hobbies, courses relating to, not exempt, V-III-16

Hobby farm

· sale of, exempt, V-I-9

Hogs, zero-rated, VI-IV-1; Memo 4-4 para. 5

Holdbacks

 on construction contracts, not taxed until due or paid, 168(7); Memo 300-6-14; Memo 19-1 paras. 81–84

Holding company, 186(1), (3); Memo 8-6; Policy P-094R, P-137, P-196R

- · indirect costs of, Policy P-196R
- optional registration, 240(3)(d); Policy P-032

Holiday relief from GST 2024-25, VI-XI

Home, see Dwelling-house; Residential complex; New housing rebate; Single unit residential complex

Home care service

- · defined, V-II-1
- exempt, V-II-13

Homemaker service, see Home care service

Home office expenses

- limitation on input tax credits, 170(1)(a.1); Memo 8-2 paras.
 8-12
- no ITC for residence unless primarily for business use, 208(1)

Homes, see Residential property

Homosexual relationships, see Common-law partner

Honey

- bees, zero-rated, VI-IV-1; Memo 4-4 para. 5
- -coated or -sweetened foods, taxable, VI-III-1(e); Memo 4-3 paras. 45–54
- zero-rated, as food, VI-III-1

Hops, zero-rated, VI-IV-3; Memo 4-4 para. 15

Horse

- meat zero-rated if supplied for human consumption, Memo 4-4 para. 8
- ownership, joint venture election, Joint Venture (GST/HST) Regulations s. 3(1)(j)
- · racing, pari-mutuel betting exempt, V-VI-5.2
- sale of, not zero-rated, VI-IV-1; Memo 4-4 para. 7
- supplies by auction, election, 177(1.3); Property Supplied by Auction (GST/HST) Regulations s. 1(b)

Hospital, *see also* Charity; Health care facility; Health care services, exempt; Public institution; Public sector body; Public service body

activities engaged in as, Policy P-245

- authority, defined, 123(1)"hospital authority"; Memo 25-2
- bed, zero-rated, VI-II-4; Memo 4-2 paras. 4-6
- cosmetic service supplied by, not exempt, V-VI-2(p)
- constitutes public institution or not, 123(1)"public institution"
- constitutes public sector body, 123(1)"public sector body"
- constitutes public service body, 123(1)"public service body"
- employees' pension plan, Policy P-197
- excluded from definition of *de minimis* financial institution, 149(4.1)(a)(i); Memo 17-7 para. 5
- hospital-like services provided by other health care provider, 259(2.1)
- multiple capacities, apportionment of public service body rebate, 259(4.1), (7), (8)
- parking, exempt, V-V.1-7, V-VI-25.1
- rebate of 83% of GST paid, 259(1)"specified percentage"(b), 259(3)(a); TIB B-025; Memo 500-4-4; Policy P-245
- rebate of percentage of HST paid, 259(1)"specified provincial percentage", 259(3)(b); Public Service Body Rebate (GST/HST) Regulations s. 5(c)(ii)

Host gifts (network sellers), 178(9), (22); Info Sheet GI-052

Hot chocolate

• dispensed, taxable, VI-III-1(0.4); Memo 4-3 para. 120

Hotel, see also Accommodation; Bed and breakfast; Short-term accommodation

- excluded from residential complex, 123(1)"residential complex"(d)–(f)
- · meaning of, Policy P-099
- room constitutes residential unit, 123(1)"residential unit"
- taxes, whether part of base for GST, Taxes, Duties and Fees (GST/HST) Regulations s. 3(c); TIB B-029

House, *see* Accommodation; Dwelling-house; New housing rebate; Real property; Residential complex; Residential property; Single unit residential complex

House hopper, 191(1), *see also* Self-supply rules: residential property

Household care, see Home care service

Household effects

- no GST on importation, VII-1
- no HST on bringing into participating province, X-I-10

Household equipment, device to control, for disabled person, zero-rated, VI-II-8; Memo 4-2 para. 14

Housing authority, see Para-municipal organization

Housing co-op, see Cooperative: housing corporation

Housing organization, designation as municipality, Info Sheet GI-124

Housing rebate, see New housing rebate

Human being, see Individual

Human consumption

- food for, VI-III, see also Food
- produce for, VI-IV, see also Agriculture and fishing, zerorated

Human embryo

- no tax on bringing into HST province, X-I-27
- · no tax on importation, VII-13

Human ovum, zero-rated, V-I-6

Human sperm, zero-rated, VI-I-5

Human tissue, zero-rated, VI-II-25

Hunting licence

- commercial, not taxed, 162(1); Policy P-110R
- consumer, taxable, 146(b), (c), V-VI-20(j)

Hunting package, whether eligible for non-resident rebate, Info Sheet GI-046

Hurricane straps for mobile home, Policy P-070R

Hutterite colonies

• excluded from self-supply rules, 191(6.1)

Hydrant, see Fire hydrant, relocation of, exempt

Hydrocarbons, see Mineral

Hydro-electric commission, see Para-municipal organization

Hygienist, see Health care services, exempt

ı

ILP, see Investment limited partnership

ITC, see Input tax credit

Ice

- removal by municipality, exempt, V-VI-21.1(b)
- zero-rated, VI-III-1(r); Memo 4-3 paras. 35-36

Ice cream, whether zero-rated, VI-III-1(k), (o)(v); Memo 4-3 paras. 74–84

 whether package/sold in single servings, Policy P-213; Memo 4-3 para. 82

Ice lollies, taxable, VI-III-1(j); Memo 4-3 paras. 71-73

Ice milk, taxable, VI-III-1(k), (o)(v); Memo 4-3 paras. 74–84

 whether package/sold in single servings, Policy P-213; Memo 4-3 para. 82

Ice tea

• dispensed, taxable, VI-III-1(0.4); Memo 4-3 para. 120

Ice waters, flavoured, coloured or sweetened, taxable, VI-III-1(k), (o)(v); Memo 4-3 paras. 71–73

Ileostomy appliance, zero-rated, VI-II-25, 26; Memo 4-2 paras. 43, 44

Immigration

 no tax on importation of household goods, VII-1 (settlers' effects, returning residents' effects)

Immovable property, see Real property

Impairment, see also Disabled person or disabled individual

- hearing
- communication device for telephone, VI-II-2; Memo 4-2 para. 1
- converter of sound to light signals, VI-II-7; Memo 4-2 paras. 12, 13
- • hearing aid, VI-II-12; Memo 4-2 para. 20
- speech
- • communication device for telephone, VI-II-2; Memo 4-2 para. 1

Implementation date

• defined, 348

Import certificates

• application for, 213.2(2), 213.2(4)

- cancellation of, 213.2(3)-(4)
- issuance of, 213.2(1)
- non-taxable importation under, VII-8.1
- security, 213.1
- termination of, 213.2(5)

Importation, Memo 3-1 paras. 14–22, *see also* Bringing into a participating province

- alcoholic beverages, licence taxable, 146(d), V-VI-20(c)
- art, restriction on input tax credit, 176(5) [repealed]; Memo 400-3-6
- by registrant for delivery on behalf of non-resident, 180
- · certificate, 213.1
- computer software, TIB B-037R; Policy P-150
- defective goods, rebate, 215.1(2)–(3)
- defined, 123(1)"import", 195.2
- determination of tax status, 216
- · excise duties and taxes on
- • imposed, Excise Tax Act Parts I–IV (non-GST, not reproduced)
- • included in base for GST, 154, 215(2); Taxes, Duties and Fees (GST/HST) Regulations; TIB B-029
- foreign rental vehicles, *see* Temporary importation: foreign rental vehicles
- goods, Memo 300-8
- • held in bond at Customs, 144, VI-VII-1(1)"place outside Canada"
- • input tax credit where importer not owner, 178.8
- • no tax on, 213, Sch. VII
- ••• Canadian goods returned, *Non-Taxable Imported Goods* (GST/HST) Regulations s. 3(n)
- • commercial samples, VII-1
- • conveyances, VII-1, 8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(f)
- ••• courier imports from US or Mexico up to \$40, VII-7.01
- • crude oil, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(e)
- • defective goods repaired under warranty, VII-5.1
- • diplomats' effects, VII-1
- • exhibition, goods for, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(c)
- • export distribution centre, goods for, VII-11
- • • subsequent reimportation, 215(3)
- • import certificate, under, VII-8.1
- • • subsequent reimportation, 215(3)
- maintenance, goods for, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(d)
- • medals and trophies to be presented, VII-8; *Non-Taxable Imported Goods (GST/HST) Regulations* s. 3(k)
- • metals, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(b)
- • Mexico courier imports up to \$40, VII-7.01
- • museum exhibits, VII-1
- • precious metals, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(a)
- prescribed, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations; TIB B-023
- ••• prizes and trophies won outside Canada, VII-2
- • railway equipment, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(h)

Importation (cont'd)

- • repair, goods for, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(d)
- • returnable containers used in international trade, VII-1
- • returning residents' purchases, VII-1
- settlers' effects, VII-1
- • temporary imports, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(i)
- • tourist literature, VII-3
- • tourists' baggage, VII-1
- • US courier imports up to \$40, VII-7.01
- • value under \$20, VII-7; Mail and Courier Imports (GST/HST) Regulations; Courier Imports Remission Order s. 4; Postal Imports Remission Order s. 4
- • warranty-repaired goods, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(j)
- • warranty replacement parts, VII-5
- ••• zero-rated supplies (most), VII-6
- supply by unregistered non-resident, tax on, 220.06; TIB B-079, B-XX5
- • tax on, 212–216; Memo 300-8
- ••• imposition of federal tax, 212
- ••• imposition of provincial tax, 212.1, 220.06; TIB B-079, B-081, B-XX5
- •••• rebate where not for use in HST province, 261.2
- • payment of tax, 214
- valuation of, 215; Value of Imported Goods (GST/HST) Regulations; TIB B-031
- vehicles, see Temporary importation: foreign rental vehicles
- import certificate, 213.1
- input tax credit, 169(1), (2), 178.8; Policy P-125R, see also Input tax credit
- intangible personal property, tax on, 217–220; Memo 300-9; TIB B-095
- • change in use of, 198.2 [repealed]
- last, meaning of, 195.2(1)
- provincial taxes on, whether included in base for GST, 154;
 Taxes, Duties and Fees (GST/HST) Regulations; TIB B-029
- publications, see Book; Magazine
- purpose, see Change in use of capital property; Use: in commercial activities
- rental vehicles, see Temporary importation: foreign rental vehicles
- returned goods, rebate, 215.1(1)
- security for, 213.1
- services, tax on, 217-220; Memo 300-9; TIB B-095
- services performed on imported goods, zero-rated, VI-V-4; Memo 4-5-3 paras. 34–36; Policy P-074
- specified tangible personal property, restriction on input tax credit, 176(5) [repealed]; Memo 400-3-6
- temporary, see Temporary importation

Imported cars

 defined, re importation of railway cars, Non-Taxable Imported Goods (GST/HST) Regulations s. 3(h.1)

Imported taxable supply

- defined, 217; Memo 300-9
- tax on, 218, 218.1; Memo 300-9; TIB B-081

Importer of record

- claiming input tax credits, 178.8; Policy P-125R
- constructive importer, 178.8(2)
- deemed importer, 178.8(2)
- specified importer, 178.8(5)

Imposition of tax (charging provisions)

- assessment, see Assessment
- Division II
- • federal tax, 165(1)
- • provincial tax, 165(2)
- Division III
- • federal tax, 212
- • provincial tax, 212.1
- Division IV
- • federal tax, 218
- • provincial tax, 218.1
- Division IV.1, TIB B-XX5
- • bringing property into HST province, 220.05, 220.07
- • intangible property, for use in HST province, 220.08
- • receiving property from unregistered non-resident, 220.06
- • service, for use in HST province, 220.08
- provincial portion of HST, 165(2), 212.1, 220.05-220.08

Imprisonment, see Offences; Penalties

Improvement (to capital asset or property), see also Change in use of capital property; Input tax credit

- defined, 123(1), V-I-1 [repealed]; Streamlined Accounting (GST/HST) Regulations s. 2(1)
- importation of, defined, 195.2(2)
- · input tax credit
- • property or service acquired partly for, 169(1.1)
- • subsequent sale not exempt, V-I-2, 3, 4, 5
- · personal property
- • aircraft, 202(3)
- • automobile (passenger vehicle), 202(1), (3)
- • tax recovered on sale of, 203(1), (4)
- • generally, 199(4)
- property/service acquired partly for, 169(1.1)
- · real property
- input tax credit on increase in use in commercial activities, 206(2), (3)
- input tax credit on sale, 193(1), (2); Memo 19-2-3 para.
 Appendix
- • of individual, 207, 208(2)–(4)
- • of non-registrant, rebate of tax on sale, 257(1); Memo 19-3-6
- • of public sector body, 209, 211(2)

Imputed input tax credit

• defined, Games of Chance (GST/HST) Regulations s. 5(1)

In respect of property situated in Canada

 meaning of, Memo 4-5-3 paras. 14–22; Memo 19-1 paras. 39–46; Policy P-169R

In the course of transporting

• meaning of, Policy P-076

Inactive business, temporary cessation of filing, 238.1, TIB B-072

Inadequate records, see Books and records

Inbound international freight, zero-rated, VI-VII-8, 9, 10; Memo 28-2 paras. 68–71

Incapacitated individual, *see* Disabled person or disabled individual; Receiver

Incidental supply, see also Combined supply; Containers and coverings

- · deemed part of primary supply, 138
- meaning of, Policy P-159R1
- parking space, V-I-8, V-I-8.1; Memo 19-2-1 paras. 47–48; Memo 19-2-2 paras. 18–20
- · real property
- exempt supply and new addition deemed not incidental to each other, 132(3)
- residential and non-residential portions deemed not incidental to each other, 132(2)
- tour package, taxable and non-taxable parts deemed not to be incidental to each other, 163(2)
- transportation of goods, relating to, 221(3), VI-V-1(c), VI-VII-1(1)"freight transportation service"; Memo 4-5-2 paras. 1(c), 5, 7; Memo 28-2 paras. 27–39, 53
- undivided working interest in mine or oil or gas well, Policy P-128R2
- whether supplied together with other property or service, Policy P-160R

Included charges, see Combined supply; Incidental supply

Inclusive pricing, see Tax-extra or tax-inclusive pricing

Income Tax Act provisions and terms incorporated by reference, Memo 500-7

- adjusted cost base, 123(1)"improvement", 192(a)
- administration of employee/partner rebate, 253(5)
- aircraft expenses, 253
- allowances, 174(c), 253(1)
- amount assessed after non-arm's length transfer by person owing tax, 325(1)(d)B
- arm's length, 126(1)
- associated corporations, 127(1)
- automobile expenses, 253; Policy P-113R
- business, income from a, 120(3), 149(1)(b)(i), (4), 174(b), 185(2)
- capital cost allowance, 202(4), 253
- capital cost limitation for passenger vehicle, 201(b), 202(1)
- capital property, 120(1)"capital property", 123(1)"capital property"
- child (ITA 70(10)(a)), V-I-12(a)(iii)
- Classes 12 and 14, 120(1)"capital property", 123(1)"capital property"
- compliance with required before refunds etc. paid, 229(2), 230(2), 238.1(2)(c)(iii), 263.02, 296(7)
- corporation incorporated to administer a registered pension plan, 149(5)(f)
- cost (of real property that is not capital property), 123(1)"improvement"
- credit union, 123(1)"credit union"
- deferred profit sharing plan, 149(5)(a)(v)
- deposit insurance corporation, 123(1)"credit union"
- employee benefit plan, 149(5)(a)(viii)
- employee trust, 149(5)(a)(ix)
- employees profit sharing plan, 149(5)(a)(ii)

- employment, expenses, 253; Memo 500-4-6; Policy P-028 (obsolete), P-113R
- employment, income from, 170(1)(b), 173, 253
- first home savings account, 149(5)(a)(iv.2)
- fiscal period, 244(2)
- food, beverage and entertainment expenses, 236(1)
- income, 149(1)(b)(i), 174(b), 235, 236(1), see also business, income from a; employment, income from (above)
- inter vivos trust, 268
- inventory, 120(1)"tax-paid goods"
- investment corporation, 149(5)(b)
- lease of passenger vehicle, limitation, 235(1)
- meal expenses, unvouchered, Policy P-028 (obsolete)
- meals and entertainment, 236(1)
- mortgage investment corporation, 149(5)(c)
- musical instrument expenses, 253
- mutual fund corporation, 149(5)(d)
- mutual fund trust, 149(5)(a)(x)
- non-arm's length, 126(1)
- non-arm's length transfer by person owing tax, 325(1)(d)B
- non-resident-owned investment corporation, 149(5)(e)
- partner's expenses, 253
- passenger vehicle, 123(1)"passenger vehicle", 201, 202(1), 235(1)
- patronage dividend, 123(1)"patronage dividend"
- pooled fund trust, 149(5)(a)(xi)
- pooled registered pension plan, 149(5)(a)(i.1)
- · proceeds of disposition
- • distribution by trust, 269
- • settlement of trust, 268
- provincial income allocation, 225.2(2), (4); TIB B-083R
- reasonable allowances, 174(c)
- registered Canadian amateur athletic association, 123(1)"charity"
- registered charity, 123(1)"charity"
- registered disability savings plan, 149(5)(a)(vi.1)
- registered education savings plan, 149(5)(a)(vi)
- registered pension plan, 149(5)(a)(i)
- registered retirement income fund, 149(5)(a)(vii)
- registered retirement savings plan, 149(5)(a)(iv)
- registered supplementary unemployment benefit plan, 149(5)(a)(iii)
- related persons, 126(2)
- retirement compensation arrangement, 149(5)(a)(xiii)
- rollover, see Rollover
- shareholder benefits, 173; Memo 9-1
- TFSA, 149(5)(a)(iv.1)
- taxable benefit to employee, 202(4)(b)B(i), 170(1)(b), 173;
 Memo 9-1, 9-2
- taxable benefit to shareholder, 202(4)(b)B(i), 173; Memo 9-1, 9-2
- tax-free savings account, 149(5)(a)(iv.1)
- tax-receiptable event, exempt
- • charity, V-V.1-2
- • political party, V-VI-18.2
- • public institution, V-VI-3
- taxation year, 123(1)"taxation year"
- unit trust, 149(5)(a)(xii)

Income tax administration

merging with GST administration, 123(1)"Agency" (Analysis);
 Revenue Canada news release 92-53

Income tax refund discounter, 158; Memo 17-10

• bad debt of, Policy P-123; Memo 17-10 paras. 15-16

Incomplete assessment, effect of, 299(2), (4)

Incontinence products

• zero-rated as medical devices, VI-II-37; Memo 4-2 para. 55

Incorporeal movable property, see Intangible property

Incorrect assessment, effect of, 299(2), (4)

Incorrect statement re exempt sale of real property, 194

Incorrectly charged tax

- input tax credit for, 296(2.1)
- rebate of, 26

Increase in use in commercial activity, *see* Change in use of capital property

Indebtedness, see also Debt

- · to Her Majesty
- • garnishment, 317
- • set-off, 277(1)(f), 318; Policy P-162

Indemnity

• whether financial instrument, Memo 17-1 para. 43

Independent agent

does not create permanent establishment, 123(1)"permanent establishment"(b)

Independent sales contractor, see also Direct seller

- alternate collection method, 178.1-178.5; Info Sheet GI-126
- cancellation of registration, 178.5(11), 242(2.2); Memo 14-1 paras. 58, 59
- defined, for direct seller rules, 178.1; Memo 1-5
- property appropriated for, 178.5(8)

Indexes

• of Technical Information Bulletins, Memo 1-3

Indians and Indian bands, 165 (Analysis); TIB B-03R2, B-048

- First Nations Goods and Services Tax, guide RC4365; FNGST Act (at back of book)
- lease or license of personal property to, Policy P-230R
- Maa-nulth First Nations no longer eligible for relief, Notice 263
- maintenance of roads on reserves, joint venture election, 273(1)
- Ontario portion of HST not payable, Credit for Provincial Relief (HST) Regulations
- settlements treated as reserves, *Indians and Bands on certain Indian Settlements Remission Order*
- supplies to, where disclosure not required, 223(1.3)
- • British Columbia HST, Info Sheet GI-072
- Ontario, special HST treatment, Info Sheets GI-072, GI-106
- supplies to, whether taxable, 165 (Analysis); TIB B-039; Info Sheets GI-114, GI-115, GI-116, GI-117
- • at remote stores, P-246
- documentation for supplies over phone or Internet, Info Sheet GI-127
- in Prince Edward Island, Info Sheet GI-159

- • Temporary Confirmation of Registration document, Notice 264
- tax collected on reserves, First Nations Goods and Services Tax Act (at back of book)

Indicators of Agency, Policy P-182R; Info Sheet GI-012

Indictment, see Offences

Indirect tax benefit, general anti-avoidance rule, 274(2); TIB B-045

Individual, see also Consumer

- deemed resident in Canada, 132(1)(d)
- defined, 123(1)
- for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 1(1), 16(2), 25
- • for investment plan HST rules re non-residents, 225.4(2); Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 1(1), 6(2)(a)
- · disabled, see Disabled person or disabled individual
- meaning of "non-resident" in application to, Policy P-086R
- member of partnership, voluntary resignation, Policy P-216
- real property
- • conversion to residential use, 190
- • farmland, sale exempt, V-I-10, V-I-11, V-I-12
- • input tax credit availability, 207–208, *see also* Change in use of capital property
- • sale exempt, V-I-9
- transportation of, see Passenger transportation service

Inducement, see Lease (or license): inducement

Industrial design

- supplied to non-resident, zero-rated, 142(2)(c), VI-V-10; Memo 4-5-3 para. 106
- used in business in Canada, 217"imported taxable supply"(c.1)

Industrial equipment, device to control, for disabled person, zero-rated, VI-II-8; Memo 4-2 para. 14

Industrial hemp, see also Drugs

- importation of, non-taxable, VII-12
- supply of, zero-rated, VI-IV-3.1; Memo 4-4 para. 16

Industry classification system

 defined, for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, ss. 26

Infirmity, see Disabled person; Homemaker service

In-flight charges, see Aircraft: in-flight supplies

Informant payments (for leads on international tax evasion)

- amount assessed not payable to province until collected by CRA, 300.1
- disclosure of information to informer, 295(5)(o)

Information

- · books and records, see Books and records
- collection of, deemed not financial service, Financial Services and Financial Institutions (GST/HST) Regulations s. 4(2)(a)
- communication of, 295, see also Communication of information (by CRA)
- confidentiality of, see Communication of information (by CRA)
- demand for, see requirement to provide (below)

Information (cont'd)

- disclosure of, by supplier, 223; Policy P-116, P-118R
- failure to provide, penalty, 284
- · foreign-based, requirement to provide, 292
- not binding on Minister, 299(1)
- · or complaint, laid for prosecution, 332
- prescribed
- • authority for regulations, 277(1)(a)
- • defined, 123(1)"prescribed"(a)
- processing of, deemed not financial service, Financial Services and Financial Institutions (GST/HST) Regulations s. 4(2)(a)
- · provision of by government, exempt, V-VI-20
- requirement to provide, 289(1); Memo 15-1 para. 22
- • compliance order, 289.1
- ••• time contesting, not to count for reassessment clock, 289.2
- to support input tax credit claim, 169(4), 223(2); Input Tax Credit Information (GST/HST) Regulations; Memo 8-4
- transactions with related non-residents, 294
- transfer of, deemed not financial service, Financial Services and Financial Institutions (GST/HST) Regulations s. 4(2)(a)

Information return

- extension of time by Minister, 281
- required from financial institution, 273.2
- • penalty for non-filing, 284.1

Information sharing

 required for SLFI investment plan reporting, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 52; Notice 259

Infrastructure development by municipalities

• entitlement to input tax credits, Policy P-168R

Infusion pump, zero-rated as medical device, VI-II-5.2; Memo 4-2 para. 10

Ingot, see Precious metal

Ingredients

- for making beer, zero-rated, Memo 4-3 para. 15
- for making wine, zero-rated, Memo 4-3 para. 14
- mixed with or used in preparation of food, zero-rated, VI-III-1;
 Memo 4-3 paras. 1, 4, 46–47, 143–145, 147, 149, 159

Inheritance, see also Death

• tax on, 269 (Q & A)

Initial taxable percentage (of a tour package), defined, 163(3) Iniury

• payment for, not a supply, Policy P-218R

Inn, see also Bed and breakfast; Hotel

• meaning of, Policy P-099

Input tax credit, 169; Memo 8-1, *see also* Change in use of capital property; Commercial activity; Use: in commercial activities

- acceleration of claims, Policy P-003
- accounted for in Minister's assessment, 296(2)
- allocation of, 141.01(5); Memo 700-5-1; Memo 8-3 paras.
 33-49
- • financial institution, 141.02
- • objection by, detail required, 301(1.21)

- allowance paid to employee, partner or volunteer, 174; Memo 9-3; Policy P-075R
- bailiff charges, Policy P-175
- calculation of, 169(1), (2)
- carryforward of, 225(1)B(a), 225(4)
- charity, of, 225.1(2), (10); Info Sheet GI-066
- commercial service for non-resident, 169(2)
- deducted from net tax, 225(1)
- documentation requirements, 169(4), (5); Input Tax Credit Information (GST/HST) Regulations; Memo 8-4
- eligibility rules, Memo 2-7
- employer, for pension plan expenses, 172.1
- exclusive use in commercial activities, 169(1)
- exemption from documentation requirements, 169(5); Memo 8-4 paras. 42–72
- · holding corporation, see Holding company
- · imports, on
- • commercial service provider, 169(2)
- • who is entitled to ITC, 178.8; Policy P-125R
- incorrectly claimed, where rebate available instead, 296(2.1)
- joint venture participant, Policy P-138R
- · leased automobile, to lessor, Policy P-091R
- leased property, 136.1(1)
- limitations and restrictions, Memo 8-2
- • amount previously refunded, 225(3.1)
- • art, 176(5) [repealed]; Memo 400-3-6
- automobile costing over \$34,000, 201, 202(1); Memo 8-2 paras. 23–30
- • becoming a registrant, Policy P-018R
- • club dues, 170(1)(a); Memo 8-2 paras. 2-7
- • direct sellers, 178.5(7); Memo 14-1
- • four-year carryforward, 225(4)
- • home office, 170(1)(a.1), 208(1); Memo 8-2 paras. 8-12
- leased property used for shareholder, partner, etc., 170(1)(c);
 Memo 8-2 para. 20
- meals and entertainment expenses, 236(1); Memo 8-2 paras.
 50–67
- • office at home, 170(1)(a.1), 208(1); Memo 8-2 paras. 8-12
- specified tangible personal property, 176(5) [repealed];
 Memo 400-3-6; TIB B-084
- • supply used for employee benefits, 170(1)(b); Memo 8-2 paras. 13–19
- • unreasonable, 170(2); Memo 8-2 para. 21
- where election filed for simplified accounting, 227(5);
 Streamlined Accounting (GST/HST) Regulations s. 22; TIB B-028
- where election filed for simplified computation of rebate, 259(8)
- • where otherwise refunded or rebated, 225(3)
- • where previously claimed, 225(2)
- lottery corporations, 188(5); Games of Chance (GST/HST) Regulations; TIB B-018
- municipality, for infrastructure development, Policy P-168R
- notional, see Notional input tax credit
- ongoing services, 136.1(2)
- partial use in commercial activities, 169(1), 169(2)
- · pension plan expenses, 172.1
- public sector bodies, Memo 400-4
- raising of capital, 141.1(3), 185(1); Policy P-108

Input tax credit (cont'd)

- real property, Memo 19-1 paras. 98–102, *see also* Change in use of capital property
- · recapture of, see Recapture of input tax credits
- reimbursement of expenses, 175; Memo 9-4; Policy P-075R
- returnable container, no credit for, 226(4) [repealed]
- · sale of property, on
- aircraft, 203(3)
- automobile (passenger vehicle), 203(1), (3), (4); Memo 8-2 para. 32
- • municipality, by, 141.2
- real property, 193(1), (2); Memo 19-2-3 para. 102, Appendix
- sale of real property not exempt when ITC claimed, V-I-2, 3, 4, 5; Memo 19-2-1 paras. 30–31, 36–38
- seized or repossessed property, costs of resale, Policy P-175
- selected listed financial institution, limitations, 169(3); TIB B-083R
- services, multiple billing periods, 136.1(2)
- simplified calculation for small businesses, 227(4.2); TIB B-070; Streamlined Accounting (GST/HST) Regulations ss. 21.1-21.4
- startup costs, 141.1(3), 185(1); Policy P-019R, P-108
- takeover fees, 186(2); Memo 8-6 paras. 17-26
- tax paid in error, 296(2.1)
- time limit for claiming, 225(4)
- · vacation properties, Info Sheet GI-025

Interchangeable property

• for drop-shipment rules, 179(7.1)

Inquiry, by hearing officer, 276

Insignificant changes, *see also* Change in use of capital property

• cumulative change of less than 10% to be ignored, 197

Insolvency, see Bankruptcy; Receiver

Inspection (by CRA), see also Revenue Canada

- · authorization for, 288
- search warrant, 290
- solicitor-client privilege, 293

Inspection service

- provided to non-resident, whether zero-rated, VI-V-21; Memo 4-5-3 para. 81
- taxable, 146(a), V-VI-21

Installation

- accesses or egresses, exempt, V-VI-21.1(e)
- medical device, zero-rated, VI-II-34; Memo 4-2 para. 62
- road or traffic signs, lights or barriers, exempt, V-VI-21.1(a)
- services, non-resident rebate, 252.41
- · water, sewage or drainage system, exempt, V-VI-22

Instalment base

- defined, 237(2)
- • deemed nil if under \$3,000, 237(3)

Instalment contract

- timing of tax, Memo 300-6-11 para. 8
- transfer of property on satisfaction of debt, Policy P-120

Instalment period

 defined, for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 26

Instalments of tax, 237, Memo 500-2-1, 500-2-2

- contra interest, 280(3); TIB B-100; Memo 16-2 paras. 14-18
- HST, transitional calculations, 363; TIB B-083R
- instalment base defined, 237(2), (3); Transitional Instalment Base Percentage (GST/HST) Regulations; TIB B-030
- interest if late, 280(2), (4), 280(4.1); TIB B-100; Memo 16-2 paras. 9–19
- requirement to pay, 237(1)
- selected listed financial institution, 237(1), (5); TIB B-083R

Instant win game

• defined, Games of Chance (GST/HST) Regulations s. 5(1)

Instant win machine, see Gaming machine

Instant win ticket

• defined, Games of Chance (GST/HST) Regulations s. 5(1)

Institution

- · appeal, of, see Appeal
- blind, for the, supplies certified by, zero-rated, VI-II-30; Memo 4-2 para. 48
- care of children, disabled or underprivileged, V-IV-2
- · charitable, see Charity
- defined, for garnishment rules, 317(2)(a)
- educational, see Educational services; Public college; School: authority; University
- employing disabled individuals, see Certified institution (employing disabled individuals in manufacturing)
- financial, see Financial institution
- health care, see Health care facility; Health care services, exempt

Institutional care, see Health care services, exempt

Instruction, see Educational services

Instrument

- defined, Financial Services and Financial Institutions (GST/HST) Regulations s. 4(1)
- financial, see Financial instrument
- for emission, transmission or reception of telecommunication service
- • effect on place of supply, 142.1(2)
- musical, see Musical instrument
- negotiable, excluded from zero-rating for supply of financial services to non-resident, VI-IX-1(a)(i)
- prescribed, 123(1)"financial instrument"(g)

Insuflon, see Button infuser

Insulin

- button infuser, zero rated, VI-II-21.2; Memo 4-2 para. 34
- infusion pump, zero-rated, VI-II-21; Memo 4-2 para. 31
- lancet, zero-rated, VI-II-21.3; Memo 4-2 paras. 36, 37
- pen or pen needle, zero-rated, VI-II-21
- syringe, zero-rated, VI-II-21; Memo 4-2 para. 31
- zero-rated, as drug, VI-I-2

Insurance

• adjuster, 123(1)"financial service"(j)

Insurance (cont'd)

- damage appraisal service supplied to, 123(1)"financial service"(j.1); Policy P-049; Info Sheet GI-134
- adjusting services, organization providing to insurance companies, Policy P-056R2
- · agent, Memo 17-9
- broker, Memo 17-9
- Canada Deposit Insurance Corporation, constitutes financial institution, 149(1)(a)(vii)
- · claims, Memo 17-16
- · · net-of-GST method
- • leased cars, Policy P-091R
- payments not considered recovery of bad debt, Policy P-058R
- • property acquired in settlement of, 184
- self-supply of property repairs, Memo 17-16, para. 37; Policy P-014
- · corporations
- • administrative services provided by, Policy P-136R
- • foreign-based, intra-company cost allocations, Policy P-126
- • group of, see Mutual insurance corporation
- • rebate of provincial portion of HST, 263.01(2)
- exports of, zero-rated, VI-IX-2
- GST treatment of products and services, TIB B-052
- group policy, arranging for, Policy P-239 Example 7
- health care paid for by province, exempt, V-II-9
- · insured person
- • defined, V-II-1
- insurer
- • constitutes listed financial institution, 149(1)(a)(v)
- damage appraisal services provided to, 123(1)"financial service"(j.1); Policy P-049; Info Sheet GI-134
- • defined, 123(1)
- • financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 24
- • new home warranty issued by, Policy P-257
- • payment of claims "net of GST", Memo 17-16
- • property acquired in settlement of claim, 184
- life and health, third party policyholder, Policy P-161 (obsolete), P-182R
- · Lloyd's association, special rules for, 149.1
- marine, apportionment of risks for zero-rating, Policy P-011
- non-resident with permanent establishment in Canada, 128(1)
- policy
- arranging for, constitutes financial service, 123(1)"financial service"(1); Policy P-239 Example 7
- • defined, 123(1)"insurance policy"; Memo 17-1 paras. 12-24
- held by one corporation in corporate group, Policy P-161 (obsolete), P-182R
- • marine, see Marine insurance policy
- supply of, constitutes financial service, 123(1)"financial instrument"(c), 123(1)"financial service"(d)
- property acquired in settlement of claim, 184
- risks outside Canada, zero-rated, VI-IX-2
- · segregated fund
- supplied to non-resident, when zero-rated, VI-IX-2

Insurance policy, see Insurance: policy

Insurer, see Insurance

Intangible capital

• defined, for imported supplies between branches, 220(1)

Intangible property

- acquisition for use in HST province, tax on, 220.08; TIB B-079, B-XX5
- • exclusions, X-II
- acquisition for use outside HST province, rebate, 261.3; TIB B-080
- · exclusion from transitional rules applying to rent and royalties
- • GST transition, 340(5)
- • HST transition, 354(5); TIB B-077
- export of, VI-V-10.1
- • for use in business in Canada, 217"imported taxable supply"(c.1)
- HST on, IX-III
- after April 2010, New Harmonized Value-added Tax System Regulations ss. 6–11
- importation of, 217-220; Memo 300-9; TIB B-095
- • change in use of, 198.2 [repealed]
- meaning of, in electronic commerce, TIB B-090
- · place of supply
- GST (whether in Canada), 142(1)(c), 142(2)(c); Memo 19-1 para. 38; Policy P-200R
- • HST (whether in a participating province)
- ••• after April 2010, New Harmonized Value-added Tax System Regulations ss. 6–11; Memo 3-3-5, 3-3-5-1
- supply in Canada, 142(1)(c), Policy P-200R
- supply of, in electronic commerce, TIB B-090
- supply on behalf of artists and authors, 177(2); Artists' Representatives (GST/HST) Regulations; TIB B-009
- supply outside Canada, 142(2)(c), Policy P-200R
- supply to non-resident, zero-rated, VI-V-10; Memo 4-5-3 paras. 93–106
- for use in business in Canada, 217"imported taxable supply"(c.1)
- tax on importation of, 217-220; Memo 300-9; TIB B-095
- zero-rated when supplied to unregistered non-resident, VI-V-10.1

Intangible resource

• defined, for imported supplies between branches, 220(1)

Intellectual property

- meaning of, Memo 300-3-5 para. 116; Memo 4-5-3 para. 106
- supplied to non-resident, zero-rated, 142(2)(c), VI-V-10; Memo 4-5-3 para. 106
- • used in business in Canada, 217"imported taxable supply"(c.1)

"Intended to assist"

• meaning of, Policy P-173

Intended use of property, *see also* Change in use of capital property

- input tax credit based on, 169(1), 169(2)
- vs. actual use, 196

Inter vivos trust, see also Trust

• defined, 123(1)

Intercompany transactions

• election for nil consideration, 156; Memo 14-5

Intercompany transactions (cont'd)

• financial institution in group, 150

Interest

- assessment of, 296(1)(c)
- cancellation of, 281.1(1); Memo 16-3
- • balance owing not over \$2, 297.10
- interest and penalty not over \$25, 280.20, 280.2; Memo 16-2 paras. 28, 40(b)
- contra, on instalments, 280(3); TIB B-100; Memo 16-2 paras. 14-18
- FST inventory rebate overpayment, 81.39(1)(b)
- for security purposes, transfer of not a supply, 134; Policy P-115, P-120, P-122
- in joint venture, assignment of, 273(2)
- in mine, sale of, Policy P-128R2
- in oil or gas well, sale of, Policy P-128R2
- in real property, sale exempt, V-I-2, 3, 4, 5, V-V.1-1, V-VI-25
- in residential trailer park, sale exempt, V-I-5.3
- income used in determining whether person is financial institution, 149(1)(b), (4)
- offset, on instalments, 280(3); TIB B-100; Memo 16-2 paras. 14–18
- overpaid by CRA, repayable, 230.1
- payable to or by CRA, 280; Memo 16-2
- compounded daily at prescribed rate, 124; Interest Rates (Excise Tax Act) Regulations; TIB B-020; Memo 16-2 paras. 2-3, 8
- • continuous transmission commodity not exported, 236.1
- • export certificate invalid, 236.2
- • export distribution centre certificate invalid, 236.2
- • late filing of form by supplier crediting non-resident rebate, 234(2.1)
- • on judgments, 313(3)
- • on late remittance of instalments, 280(2)(b), 281(2); TIB B-100; Memo 16-2 paras. 9–19
- • on late remittance of net tax, 280(1); TIB B-100; Info Sheet GI-024; Memo 16-2 paras. 1–8
- • • selected listed financial institution, 280(1.1), (4.01); TIB B-083R; Memo 16-2 paras. 20–24
- • on rebate, 297(4); TIB B-100; Info Sheet GI-024
- • on refund due to negative net tax, 229(3); TIB B-100; Info Sheet GI-024
- ••• on refund due to overpayment, 230(3)
- • on refund upon reassessment, 296(6)
- compounded monthly at prescribed rate, 72(7); Interest Rates (Excise Tax Act) Regulations; TIB B-020
- • FST inventory rebate, 120(7)
- • FST new housing rebate, 121(6)
- • imported goods, calculated under Customs Act, 214
- payment of, constitutes financial service, 123(1)"financial service"(f)
- · prescribed rate, see Prescribed: rate of interest
- rebate of, when paid in error, 261(1)
- retroactive when legislation amended, 124(3), (4)
- waiver of, 281.1(1); Memo 16-3
- • where balance paid by due date, 280(7); Memo 16-2 para. 40(c)

• where tax and refund offset in same filing, Policy P-194R2 [cancelled in light of Villa Ste-Rose case]

Interference with remittance by secured creditor, 323.1 (draft)

- defined, 228(2.1)(a), 228(2.2); TIB B-083
- late remittance of, interest, 280(1.1), (4.01); TIB B-083R; Memo 16-2 paras. 20–24
- refund, defined, 228(2.4); TIB B-083R

Interim return

Interim net tax

• by selected listed financial institution, 238(2.1); TIB B-083R

Interline freight settlements, zero-rated, VI-VII-1(2), 11; Memo 28-2 paras. 35–42

 gravel pit owners and dump truck operators, Policy P-157 (obsolete); Memo 28-2 paras. 54-55

Intermediary

- arranging for financial service, Policy P-239
- defined, Credit Note and Debit Note Information (GST/HST) Regulations s. 2; Input Tax Credit Information (GST/HST) Regulations s. 2
- supply by principal through, documentation, *Credit Note and Debit Note Information (GST/HST) Regulations* s. 3(b); *Input Tax Credit Information (GST/HST) Regulations* s. 3(a)(i), 3(b)(ii)

Interment property

- defined, New Harmonized Value-added Tax System Regulations ss. 47.1(1), 58.3(1)
- no HST in Ontario or BC if agreement entered into before July 2010, New Harmonized Value-added Tax System Regulations s. 47.1(2)
- no HST in PEI if agreement entered into before April 2013, New Harmonized Value-added Tax System Regulations s. 58.3(2)

Intermittent urinary catheter

• zero-rated, VI-II-25.1

Inter-municipal supplies, exempt, V-VI-28

Internal charge

- defined, for importation of service from foreign branch, 217.1(4)
- • special rule for member of Lloyd's association, 217.1(9)(g), (h)

Internal use

• defined, for importation of service from foreign branch, 220(3)

Internal waters

- defined, Interpretation Act 35(1)
- included in definition of "Canada", 123(2); Policy P-152R

International bridge or tunnel authority

 supplies to, zero-rated when for construction to link Canada and U.S., VI-VIII-2; Memo 18-3 paras. 19–22

International carrier

• fuel supplied to, zero-rated, VI-V-2, 2.1; Memo 4-5-2 paras. 21–25; Memo 4-5-3 paras. 27–31; Policy P-006, P-076

International flight

- defined, 180.1(1)
- in-flight property and services not subject to GST, 180.1(2)

International freight forwarders

• services zero-rated, VI-VII-12; Memo 29-2 paras. 43, 44

International organizations, see also Foreign government

- permanent establishment in Canada deemed resident in Canada, 132(2)
- supplies between branches, 132(4), 220
- zero-rating of supplies to, VI-VIII (Analysis); Memo 18-3

International publication

- · NATO or United Nations
- • no GST on importation, VII-1
- • no HST on bringing into participating province, X-I-1
- · subscription solicited from outside Canada
- • deemed supplied in Canada, 143.1
- • GST registration required, 240(4)
- • no GST on importation, VII-7.1

International shipping corporation

• deemed non-resident, 132(5)

International voyage

- defined, 180.1(1)
- on-board property and services not subject to GST, 180.1(2)

Internet access

- · Canada Revenue Agency web site, see canada.ca/gst-hst
- excluded from recapture of Ontario/BC HST ITCs, New Harmonized Value-added Tax System Regulations, No. 2, s. 28(2)(d)
- · place of supply for HST
- • after April 2010, New Harmonized Value-added Tax System Regulations, No. 2, s. 32

Internet sales, see Electronic commerce

Interpretation Act

- definitions that apply to all Acts, *Interpretation Act* s. 35(1)
- text of, see "Other Legislation" tab (Binder P1) and GST Partner

Interpreter services, 163(3)"tour package"

Interprovincial supplies, see also Harmonized Sales Tax

· property, see Bringing into a participating province

Interval, see Lease (or license): interval

Intra-company cost allocations

• foreign-based insurance companies, Policy P-126

Intraocular lens

• zero-rated as medical device, VI-II-25; Memo 4-2 para. 43

Intravenous apparatus

- parts and attachments for, VI-II-32; Memo 4-2 para. 61(b)
- zero-rated as medical device, VI-II-5.2; Memo 4-2 para. 10

Inuit, see Indians and Indian bands

Invalid chair, see also Disabled person or disabled individual

• zero-rated, VI-II-14; Memo 4-2 para. 22

Invention

- supplied to non-resident, zero-rated, 142(2)(c), VI-V-10; Memo 4-5-3 para. 106
- used in business in Canada, 217"imported taxable supply"(c.1)

Inventory, see also Capital property

- · conversion to capital property, see Non-capital property
- defined
- • for export certificate rules, 221.1(1)

- • for FST inventory rebate, 120(1)
- • leasing or rental assets, Policy P-133
- • for GST, 123(1)
- duty-free shop, supply to zero-rated, VI-V-16; Memo 4-5-2 paras. 37, 38
- exchanges of same kind between registrants, deemed at nil consideration, 153(3); Policy P-221
- real property of public service body, election re, 211(1)(b)
- rebate, see Federal Sales Tax (FST): inventory rebate
- sale of, whether taxable, 141.1(2)

Investee

 defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 28

Investigating and recommending insurance compensation, 123(1)"financial service"(j)

Investigation, see Audit by Canada Revenue Agency

Investment corporation, see also Distributed investment plan

- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(b)
- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)
- mortgage, see Mortgage investment corporation

Investment dealer

- constitutes listed financial institution, 149(1)(a)(iii); Memo 17-6 paras 7–12
- custodial and nominee services
- • provided by non-resident, 217"imported taxable supply"(a)(iv)
- • provided to non-resident, VI-V-17; Memo 4-5-3 paras. 70–72
- mutual fund trailer commissions, Policy P-119
- products and services of, Memo 17-1-1

Investment fund

• member of mutual insurance group, 128(3)

Investment income, threshold for financial institution, 149(1)(b); Memo 17-7 paras. 9–11, 31–37

Investment limited partnership, Notice 308

- constitutes distributed investment plan, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1)"distributed investment plan"
- defined, 123(1)
- deemed not resident in Canada if 95% non-resident owned, 132(6)
- fiscal year 2018–2019, 244.1(4)
- included in "investment plan", 149(5)(f.1)
- prescribed members, Financial Services and Financial Institutions (GST/HST) Regulations s. 4.1
- supply to, by general partner, 272.1(8)
- transitional rules for 2019, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 73

Investment plan, *see also* Distributed investment plan; Non-stratified investment plan; Stratified investment plan

- consolidated filing of GST/HST returns, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 54; Notice 260
- constitutes financial institution, 149(1)(a)(ix)
- defined
- • for definition of financial institution, 149(5)

Investment plan (cont'd)

- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1)
- • for investment plan HST rules re non-residents, 225.4(2); Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 1(1), 6(2)(a)
- prescribed, includes employee life and health trust, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 8
- · distributed, see Distributed investment plan
- election to have return filed by manager, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 53; Notice 260
- fiscal year of, 244.1
- HST rebates disallowed, 261.4(2)
- HST rules re non-residents, 225.4
- information about investors to be provided to plan, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 52, 71; Notice 259
- new plan, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 57–66
- · non-stratified, see Non-stratified investment plan
- rebate for management and administrative services provided to, 261.31; *New Harmonized Value-added Tax System Regulations, No.* 2, s. 21.1(3)
- rebate of HST disallowed, 261.4(2)
- returns of, filing by manager and consolidated filing, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 53, 54; Notice 260
- services provided to, not exempt, 123(1)"financial service"(q)
- · stratified, see Stratified investment plan
- whether constitutes SLFI, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 9–15

Investor percentage

- defined, for financial institutions HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 28, 47(2)
- requirement to provide information to investment plan, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 52

Invoice, see also Disclosure of tax on invoices

- amended after the fact to show GST, Policy P-118R
- date determines GST liability, 152(1)(a), 168(1)
- defined, 123(1); Memo 300-6-3
- discount for early payment, does not reduce GST, 161; Memo 3-9
- documentation requirements, 169(4)–(5), 223, Disclosure of Tax (GST/HST) Regulations; Input Tax Credit Information (GST/HST) Regulations; TIB B-013; Memo 3-1 paras. 43–46; Memo 8-4
- false statement in, penalty, 285
- for continuous supplies (e.g., electricity), see Continuous supply (electricity, gas, etc.)
- late payment charge, does not increase GST, 161, 182(3);
 Memo 3-9
- silent on whether GST included or excluded, Policy P-116, P-118R
- telecommunications service, effect on place of supply
- • GST, 142.1(2)

• undue delay in issuing, 152(1)(b)

Invoicing requirement, see Disclosure of tax on invoices

Inward processing, 213.2; TIB B-069; Policy P-047

- exemption certificates for imported goods, 213.2
- • posting security to obtain certificate, 213.1
- input tax credit for GST paid on importation of materials, 169(2)
- • transfer of credit from unregistered non-resident, 180(a)(ii)
- materials imported free of GST, VII-8.1
- non-taxable importation of goods, VII-8.1
- subsequent reimportation of goods, 215(3), Value of Imported Goods (GST/HST) Regulations s. 13

Irregularity

- in actions of CRA officials, 299(5)
- in assessment, effect of, 299(2), (4)

Irrigation authority, see Para-municipal organization

Islands of St. Pierre and Miguelon

• air travel to, not zero-rated, VI-VII-1(1) "taxation area", VI-VII-3(a); Memo 28-3 para. 18

Isosorbide dinitrate and isosorbide-5-mononitrate (drugs), zero-rated, VI-I-2(e)(vi), (vi.1)

Issue of financial instrument, 123(1)"financial service"(d)

Issuer

- · lottery corporation
- • defined, 188.1(1)
- • supply of right by, 188.1(3)

Ivory, articles made of

• excise tax on, I-5(b); Memo 800-1

J

Jade, articles made of

• excise tax on, I-5(b); Memo 800-1

Jeopardy assessment

 Court order for assessment before end of reporting period, 322.1

Jet, articles made of

• excise tax on, I-5(b); Memo 800-1

Jewellery, see also Specified tangible personal property

• excise tax on, I-5(c); Memo 800-1

Jigs, molds, dies, tools and fixtures

 supplied to non-resident, zero-rated, VI-V-14; Memo 4-5-2 paras. 51-52

Job site, building materials not delivered to

• eligible for FST inventory rebate, 120(1)"inventory"

Joint and several (or solidary) liability, Memo 3-1 paras. 126–131, *see also* Collection of tax

- agent and principal, where agent remits tax from supply to third party, 177(1.1)
- bankrupt and trustee in bankruptcy, 265(1)(d)
- builder and purchaser, where builder credits new housing rebate to purchaser, 254(6), 254.1(6); Memo 19-3 para. 23
- directors of corporation, for unremitted tax, 323
- insurer and segregated fund, for rebate of HST on management services, 261.31(7)

Joint and several (or solidary) liability (cont'd)

- members of unincorporated body, 324(1)(b), (c)
- nil consideration election parties, 156(5)
- non-resident rebate, person crediting, 252.5(c)
- officers of unincorporated body, 324(1)(a)
- operator and joint venturer, on joint venture election, 273(5)
- partners and partnership, 272.1(5)
- receiver and person whose assets are managed, 266(2)(d)
- supplier of installation services to non-resident, 252.41(3)
- transferor and transferee of property not at arm's length, 325
- trustees and trust, 267.1(3)

Joint application

• defined, Offset of Taxes (GST/HST) Regulations s. 2

Joint filing, 228(7)

Joint tenancy

- acquisition of farmland in, Policy P-183; Memo 19-5 paras. 76–97
- transfer of farmland into, Policy P-109; Memo 19-5 paras. 76–97

Joint venture

- · distinguished from partnership, Policy P-171R
- prescribed form for, Policy P-187
- election to have tax only on supplies between operator and third parties, 273
- governments and other tax-exempt entities excluded, 273(1.1)
- • overrides election for exempt supplies, 150(2)
- • participant
- • administrative definition, Policy P-106
- • input tax credits of, Policy P-138R
- • purchases and supplies for non-electing participants, Policy P-139R
- • supply of space in co-owned building, Policy P-172R
- • prescribed activities, Joint Venture (GST/HST) Regulations
- • prescribed form for, Policy P-187
- meaning of, Policy P-139R, P-171R
- registration of, prohibited, Memo 2-1 para. 16
- transfer of interest in, whether constitutes sale of business, Memo 14-4 paras. 24–25

Journey, continuous, *see* Freight transportation service; Passenger transportation service

Judge

- authorization for collection action before end of reporting period, 322.1
- authorization for inspection of premises, 288(3), 290(1)
- constitutes officer, 123(1)"officer"
- defined
- • for search warrants, third party requirements, etc., 287
- • for solicitor-client privilege, 293(1)
- requirement to provide information or document, 289, 292
- role in solicitor-client privilege, 293
- search warrant, 288(3), 290(1)

Judgment (for tax owing)

- constitutes debt to Her Majesty, 313(1.1)
- enforcement of, 316
- interest and penalties on, 313(3)

Judicial review

• provisions apply to appeal of reference of common questions, 311(5)

Juice, see also Beverages

- bars, taxable, VI-III-1(j); Memo 4-3 paras. 71-73
- dispensed, taxable, VI-III-1(0.4); Memo 4-3 para. 120
- grape, for making wine, zero-rated, VI-III-1; Memo 4-3 para.

Κ

Kaolin

• included in definition of mineral, 123(1)"mineral"

Keeping books and records, see Books and records

Kidney dialysis machine, see Dialysis machine

Kitchen utensils, designed for the disabled

• zero-rated, VI-II-31; Memo 4-2 paras. 56-57

Knife, designed for the disabled

• zero-rated, VI-II-31; Memo 4-2 paras. 56-57

Knowledge

- of builder that purchaser not eligible for new housing rebate, 254(6), 254.1(6); Memo 19-3 para. 23
- of facts, for proof of service or documents, 335
- of false statements, penalty, 285
- of lawyer, of address of client for notification of waiver of claim, 293(15)
- of privilege, 293(15)
- of purchaser of real estate, that not exempt, 194
- of shipper of non-export of goods, 221(3)

L

Labelling

• defined, for export distribution centres, 273.1(1)

Laboratory services

- constitute institutional health care service, V-II-1"institutional health care service"(a)
- exempt, V-II-2, V-II-10; Health Care Services (GST/HST) Regulations; TIB B-019

Labour activity

- defined, for imported supplies between branches, 220(1)
- defined, for pension plan expenses, 172.1(1)

Labour and materials bond, see Construction: bond

Labour organization

• exemption for supply to or from trade union, V-VI-26

Labour Relations Board

• fee to file notice of appeal, exempt, V-VI-20(g)

Labour union, see Trade union

Labrador, see Newfoundland and Labrador

Lancet

• zero-rated as medical device, VI-II-21.3

Land, Memo 19-5, see also Farmland; Real property; Residential trailer park

- allowance for residential complex, Policy P-069
- charge on, after judgment for tax owing, 316
- infrastructure development by municipality for serviced lots, Policy P-168R

Land (cont'd)

- lease of, Memo 19-5 paras. 55-57
- • for exempt rentals, V-I-6.1; Memo 19-2-2 para. 12
- • allocation of lease payments to lease intervals, 136.1(1); Memo 19-2-2 para. 13
- ••• rebate to lessor, 256.1; Memo 19-3-5
- • for mobile home, exempt, V-I-7; Memo 19-2-2 para. 14
- • rebate to lessor, 256.1; Memo 19-3-5
- self-supply rule applies to building, 191(3)(b)(i.1), 191(4)(b)(i.1)
- leased, sale of, exempt, V-I-5.2; Memo 19-2-1 para. 44
- packer, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(c)(xiii.1); Finance news release 93-039
- severed
- • exemption on sale, V-I-9(2)(c)
- • from residential complex, Policy P-121
- sold before residential complex, in Alberta, Memo 19-3-7 para.
 1; Policy P-083
- subdivided, exemption on sale, V-I-9(2)(c)
- swap, Memo 19-5 paras. 71-75
- · transfer tax, see Land transfer tax
- transfer taxes, not part of base for GST, 154; Taxes, Duties and Fees (GST/HST) Regulations s. 3(a); TIB B-029
- underneath building, 123(1)"residential complex"
- vacant, whether sale exempt, V-I-9

Land transfer tax

 not included in consideration for GST/HST, Taxes, Duties and Fees (GST/HST) Regulations s. 3(a)

Landlord's rebate

- multi-unit buildings, 100% rebate (of 5% GST) built from Sept. 14, 2023, 256.2(3.1), (3.2)
- new rental residential property, 256.2; Info Sheet GI-091; TIB B-087
- • full rebate for construction begun after Sept. 13, 2023, 256.2(3.1), (3.2)
- Newfoundland & Labrador rebate, New Harmonized Valueadded Tax System Regulations, No. 2, s. 47(2), (4), (6), (8); Info Sheet GI-201
- Ontario rebate, New Harmonized Value-added Tax System Regulations, No. 2, s. 47; Info Sheet GI-129
- • PEI rebate, New Harmonized Value-added Tax System Regulations, No. 2, s. 58.29; Info Sheet GI-149
- public service body, overlap with PSB rebate, 256.2(9.1)
- purpose-built rental housing rebate, 256.21; Real Property (GST/HST) Regulations
- · residential care facilities, Info Sheet GI-045

Language instruction, whether exempt, V-III-11; Memo 20-7

Lapis lazuli, articles made of

• excise tax on, I-5(b); Memo 800-1

Large business

- for financial institution HST allocation rules, defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)
- Ontario/BC/PEI input tax credit recapture, 236.01(1); New Harmonized Value-added Tax System Regulations, No. 2, ss. 26–38

- • defined, 236.01(1); New Harmonized Value-added Tax System Regulations, No. 2, s. 27
- required to disclose detail on notice of objection, 301(1.2)
- two-year limit for input tax credit claims, 225(4)(a)(ii)

Laryngeal speaking aid, zero-rated, VI-II-13; Memo 4-2 para.

Laser eye surgery, exempt, V-II-5; Policy P-207

Last acquisition or importation

- meaning of, 195.2(1)
- rules deemed in force before 1991, 195.2(3)

Late filing

- election for simplified accounting, 227(2)(c), Policy P-100R
- return
- •• extension of time by CRA, 281; Memo 16-2 paras. 39, 40(d)
- • penalty, 281.1; Memo 16-2 paras. 25-26

Late payment penalty

- daily compounding, 124(2)
- no effect on calculation of tax, 161, 182(3); Memo 3-9

Laundering service

 homemaker service, where supplied or paid for by government or municipality, exempt, V-II-13

Laundry machines

 in residential complex, exempt, V-I-13.3; Memo 19-2-2 paras. 23–24

Law enforcement service supplied to government or municipality, exempt, V-VI-20(g)

Law Society, see also Professionals and professional services

- courses exempt unless election made, V-III-6; Memo 20-9
- fees exempt unless election made, V-VI-18

Lawsuit

- for collecting GST, prohibited, 224.1
- for unpaid GST, 224

Lawyer

- misrepresentation by, penalty, 285.1
- representing client, CRA can disclose information to, 295(6)(b)
- services of
- • costs, see Costs (legal)
- • disbursements of, Policy P-209R
- excluded from financial services, 123(1)"financial service"(r)
- • litigation, see Litigation
- management company for, acceleration of ITC claims, Policy P-003
- provided to non-resident, 142(2)(g), VI-V-9, VI-V-23;
 Memo 4-5-3 paras. 87–90; Policy P-206
- solicitor-client privilege, 293

Laying

- of information or complaint, 332
- or repair of oceanic telegraph cable, supply to non-resident for use in ship, zero-rated, VI-V-2(c); Memo 4-5-2 para. 21(c)

Leafcutter bees

 zero-rated after June 10, 1993, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(g)(xi); Memo 4-4 Schedule

Lease (or license), *see also* Accommodation; Contract; Real property; Sale; Supply

- activity constitutes business, 123(1)"business"
- · aircraft
- election not to claim input tax credit, 173(2)–(4); Memo 9-2 paras. 45–53
- art, limitation on input tax credit, 176(5)(c) [repealed]
- automobile
- • dollar limitation on input tax credit, 235; Memo 8-2 paras. 42–49
- • election not to claim input tax credit, 173(2)–(4); Memo 9-2 paras. 45–53
- • input tax credit to lessor for insurance repairs, Policy P-091R
- •• monthly payment over \$900, 235; Memo 8-2 paras. 42-49
- • payments to lessor for loss or damage, Policy P-225
- breach of, damages, 182
- cancellation payment, 182; Policy P-218R
- · charity, by, in connection with lease of real property
- • exempt, V-V.1-1
- • not exempt, V-VI-2(f)
- commercial, see real property (below)
- constitutes supply, 123(1)"supply"
- defined, 191(3) (Analysis); Memo 19-1 paras. 25–31; Policy P-062
- • includes licence or similar arrangement, 191(4.1), 256.2(2)
- distinction between lease and licence, Policy P-062
- drop-shipment rules, 179(8)–(12)
- election for, to be supply of financial service, 150(1)
- emphyteutic, Memo 19-1 paras. 29-30; Policy P-174
- grandfathered, 340(3), (6)
- Indian or Indian band, to, Policy P-230R
- inducement payments, Memo 19-4-1 paras. 36–46; TIB B-054 (obsolete)
- input tax credit determination, 136.1(1)
- interval
- • consideration attributable to, 136.1(1)(c); Memo 19-2-2 para. 13
- • defined, 136.1(1)(b), IX-I-1
- • no effect on whether supply made in Canada, 136.1(2)(d)
- • residential sub-lease, 136(2.1)
- • when supply deemed made, 136.1(1)(b)
- land
- for mobile home, 190(3), V-I-7; Memo 19-2-2 para. 14; Memo 19-2-3 paras. 64–67
- • long-term, with sale of house
- • exempt, V-I-5.1; Memo 19-2-2 paras. 40-43
- • new housing rebate, 254.1; Memo 19-3-2
- ••• sale of land exempt, V-I-5.2; Memo 19-2-1 paras. 40-43
- long-term, defined, 254.1(1); Memo 19-3-2 para. 2(c)
- · medical equipment
- • by health care facility to consumer, exempt, V-II-3
- not a financial service, 123(1)"debt security"
- option to purchase, see purchase option
- outside Canada, 142(2)(a); Policy P-193R
- parking space, whether exempt, V-I-8.1, V-V.1-1, V-VI-25(h); Memo 19-2-2 paras. 18–20
- passenger vehicle, see automobile (above)

- payments redirected to financial institution, remittance of tax, Policy P-131R
- · place of supply
- • GST (whether in/outside Canada), 142(1)(b), 142(2)(b); Policy P-193R
- • HST (whether in a participating province), IX-II-2; Policy P-193R
- • remains same as when first delivered, 136.1(1)(d)
- property acquired by insurer in settlement of claim, 184(7)
- property held for, FST inventory rebate, 120(1)"inventory"
- property seized or repossessed by creditor, 183(8)
- property used primarily for benefit of shareholder, partner, beneficiary, etc., 170(1)(c); Memo 8-2 para. 20
- purchase clause in residential rent-to-own agreement, Policy P-164
- · purchase option
- • place of supply when exercised, 136.1(1.1)
- real property, see also land, above
- • by builder, tax required to be collected, 191(1)–(4)
- • by public service body, whether exempt, V-VI-25
- • deemed to be supply of real property, 136(1)
- • FST new housing rebate to builder, 121(2)(a)(i)
- • farmland, for share of crops, zero-rated, VI-IV-9; Memo 4-4 para. 35
- • for re-supply, election re, 211(1)(c)
- • inducements on, Memo 19-4-1 paras. 36–46; TIB B-054 (obsolete)
- • mobile home, for, V-I-7; Memo 19-2-2 para. 14
- municipal taxes included may become taxable, V-VI-21 (Analysis)
- • residential, exempt, V-I-6; Memo 19-2-2 paras. 1-11
- to supplier of exempt residential leases, 191(10), 256.1, V-I-6.1; Memo 19-2-2 paras. 12-13
- • whether exempt, V-V.1-1, V-VI-25(f); Policy P-062
- residential, exempt, V-I-6; Memo 19-2-2 paras. 1–11, see also Residential sub-lease
- residential complex under construction, person acquiring for purposes of deemed builder, 123(1)"builder"(d)(iv)
- sale-leaseback agreement, determining consideration, 153(4)
- school authority, by, to student, exempt, V-III-15; Memo 20-1
- specified tangible personal property, limitation on input tax credit, 176(5)(c) [repealed]
- student, to, by school authority, exempt, V-III-15; Memo 20-1
- sublease, see Sublease
- tangible personal property
- • deemed to be supply of tangible personal property, 136(1)
- • in or outside Canada, Policy P-193R
- • to Indian or Indian band, Policy P-230R
- termination, 182
- · transitional rules
- • GST (1991), 340
- •• HST (2010), New Harmonized Value-added Tax System Regulations s. 42
- Nova Scotia HST (2010), Nova Scotia HST Regulations s. 4, 19(2)(d), 19(3)(a), (1)
- • no tax before 1994 where agreement before 1991, automobiles and health care equipment, 340(3)(b)
- • no tax where agreement before August 8, 1989, 340(6)

Lease (or license) (cont'd)

- •• PEI HST (2013), New Harmonized Value-added Tax System Regulations s. 58.24
- vehicle converted for use by disabled individual, reduced tax, 258.1(7); Info Sheet GI-199
- when consideration due and tax payable, 152(2)

Lease inducement, see Lease (or license): inducement payments

Lease interval, see Lease (or license): interval

Leaseback arrangement, determining consideration, 153(4.1)–(4.6)

Leasehold improvements

• used as lease inducement, Memo 19-4-1 paras. 44-46

Leasing assets

• FST inventory rebate, Policy P-133

Leaves, tobacco, zero-rated, VI-IV-7; Memo 4-4 para. 33

Leaving Canada

- non-resident performer or employee, requirement to remit tax, 238(3); Policy P-134R
- · tax debtor, seizure of property from, 322

Lecturer, non-resident, see Non-resident: performer or lecturer

Leg

- artificial, zero-rated, VI-II-22; Memo 4-2 para. 38
- of a journey, defined, New Harmonized Value-added Tax System Regulations s. 20; Memo 28-3 para. 7

Legal aid

- plan, rebate for tax paid, 258; Memo 13-2
- services, exempt, V-V-1; Memo 5-3

Legal reports by physician, whether taxable, Policy P-256

Legal service, see Lawyer: services of

Legion entity

defined, 259.2(1)

Legislated consumers' refund

• defined, for returnable containers, 226(1)

Legislative amendments

- April 23, 1996 proposals, TIB B-075
- change in use of capital property resulting from, 198.1(a) [repealed]
- interest to apply retroactively, 124(3)
- retroactive effect of, S.C. 1993, c. 27, s. 210 (reproduced before s. 122)

Legislature, see Provinces and provincial law

Legs of a journey, see Continuous journey

Lending library, borrowing privileges exempt, V-VI-19

Lending of money, see also Financial service(s); Interest

- constitutes financial service, 123(1)"financial service"(c)
- garnishment of amount to be lent, 317
- to non-resident, whether exempt or zero-rated, V-VII, VI-IX-1(a)(ii)
- where principal business is, 149(1)(a)(viii)

Lens blanks

· for prescription eyewear, zero-rated, VI-II-32

Lenses (contact or for eyeglasses), zero-rated, VI-II-9; Memo 4-2 para. 15

• partly finished, zero-rated, VI-II-32; Memo 4-2 para. 15

Lessee

• defined, for sale-leaseback arrangements, 153(4.1)(a)

Letter

- constitutes a record, 123(1)"record"
- garnishment, 317

Letter of credit, 123(1)"money"

Liability, see also Imposition of tax (charging provisions); Joint and several (or solidary) liability; Penalties; Offences

- builder, see Builder: liability of
- directors of corporation, for unpaid tax, 323
- distributing property of estate, etc., without certificate, 270
- for tax, time of, see Time: tax payable
- partners, for obligations of partnership, 272.1(5)
- to collect tax, 221
- to pay tax, 165(1), 299(2); Memo 3-1 paras. 4-8
- trustee, for obligations of trust, 267.1
- unincorporated association, officers and members, 324

Library (public), see also Para-municipal organization

- borrowing privileges exempt, V-VI-19
- library board, may apply to be municipality, 123(1)"municipality"(b); TIB B-046
- rebate for printed books, 259.1; Memo 13-4

Licence, see also Lease (or license)

- distinction between licence and lease, Policy P-062
- holder, government fees to recover cost of administering regulatory program, exempt, 189.1
- meaning of, Policy P-062
- software, see Software
- supplied by government, whether exempt, V-VI-20(c), (j), (k)
- · to use real property
- • supplied by public institution or other public sector body, not exempt, V-VI-25(f)
- • supplied by charity, exempt, V-V.1-1
- to use tangible personal property
- • to Indian or Indian band, Policy P-230R

Licensed duty-free shop, see Duty-free shop

Licensed manufacturer

• transitional rule re GST, 337(7)

Licensed practical nurse, see Health care services, exempt

Licensed wholesaler

- cancellation of licence, 119(2)
- transitional rule re FST, 118(1), (2), (7)
- transitional rule re GST, 337(7)

Licensing of insurance adjusters, Policy P-056R2

Lien, on property to enforce judgment for tax owing, 316

Life insurance, see Insurance

Life lease

 whether subject to self-supply rules, Memo 19-2-3 paras. 24–28

Life memberships, transitional rules

- GST, 345
- HST, 356(6); TIB B-077

Lift chair, Info Sheet GI-133

Lift for wheelchair, zero-rated, VI-II-14; Memo 4-2 para. 22

Limb, artificial, zero-rated, VI-II-22; Memo 4-2 para. 38

Limitation period

- · appeal of assessment
- • extension of time, 305
- • 90 days after confirmation of assessment, 306
- • 180 days after notice of objection filed, 306(b)
- assessment
- • rebate, reassessment 4 years, 298(2)
- • tax and penalties, generally 4 years, 298(1)
- • where fraud, misrepresentation or waiver, none, 298(4)
- bad debt write-off 4 years, 231(4)
- cancellation of small supplier's registration, minimum 1 year, 242(2)(b)
- collection of tax debt by Crown, 10 years, 313(2.1)–(2.8)
- direct sellers 4 years, 178.3(3), 178.3(4)
- directors' liability 2 years, 323(5)
- distributors of direct seller products 4 years, 178.4(3), 178.4(4)
- election
- • exempt supplies within corporate group, 150(3)(c)
- • fiscal months and fiscal quarters, 243(3)
- • fiscal year, 244(4)(c)
- • museum or gallery, re art acquired for exhibit, 176(6)(b) [repealed]
- • patronage dividends, 233(4)
- • Quick Method, 227(2)(c); Policy P-100R
- • real property of public service body, 211(5)(c)
- • reporting period, 250(d)
- •• sale of business, 167(1.1); Memo 14-4 para. 12
- • simplified public service body rebate calculation, 259(13)
- streamlined or simplified accounting, 227(2)(c); Policy P-100R
- export of property for non-resident business rebate, 60 days, 252(1)
- GAAR adjustment request 180 days, 274(6)
- input tax credit claims 2 or 4 years, 225(4)
- · notice of objection
- extension of time, 303, 304
- • 90 days, 301(1.1)
- prosecutions 8 years, 332(4)
- real property, adverse possession rights, Policy P-178
- rebate
- • amount paid in error 2 years, 261(3)
- • charity exports 4 years, 260(2)
- • employees and partners 4 years, 253(3)
- imported goods
- • damaged 2 years, 215.1(2)(d)
- • not subject to duty 2 years, 215.1(3)(d)
- ••• returned to supplier 2 years, 215.1(1)(c)
- • land leased for residential purposes 2 years, 256.1(2)
- • legal aid plan 4 years, 258(3); Memo 13-2 para. 18

- • new housing (owner-built) 2 or 4 years, 256(2.01), (3); New Harmonized Value-added Tax System Regulations, No. 2, ss. 46(4), 46(6)
- • new housing (purchased) 2 years, 254(3), 254(4)(c), 254.1(3), 254.1(4)(b), 255(3); New Harmonized Value-added Tax System Regulations, No. 2, ss. 41(4), 46(6)(c)(iv), 43(3), 43(4)(c)(iii), 45(4)
- new rental housing, 2 years, 256.2(7); New Harmonized Value-added Tax System Regulations, No. 2, s. 47(11)
- • non-resident 1 year, 252.2(a), 252.3, 252.4(1), 252.4(3)
- • printed books, 4 years, 259.1(3); Memo 13-4
- • public service body 4 years, 259(5), (5.1)
- • sale of real property by non-registrant 2 years, 257(2)
- remittance of tax, 228(2)
- return
- • annual filers, 3 months or June 15, 238(1)(a)
- • extension of time, 281; Memo 16-2 paras. 39, 40(d)
- • monthly and quarterly filers, 1 month, 238(1)(b)
- • waiver of interest and penalty, Memo 16-3 para. 10
- · revocation of election
- • exempt supplies within corporate group, 150(4)(c)
- • fiscal year, 244(4)(c)
- • patronage dividends, 233(5)
- • real property of public service body, 211(5)(c)
- • streamlined accounting or Quick Method, minimum 1 year, 227(4.1)
- unincorporated body, officers' liability, 324(3)(c)
- variation of taxi operator's registration to apply only to taxi business, minimum 1 year, 242(2.1)
- waiver of interest and penalty, 10 years, 281.1; TIB B-100; Info Sheet GI-024

Limitations

- amounts, see Dollar amounts in legislation and regulations
- appeals to Tax Court, 306.1
- input tax credits, *see* Input tax credit: limitations and restrictions
- objections, where rights waived, 301(1.6)
- time periods, see Limitation period

Limited partner

• not liable for obligations of partnership, 272.1(5)

Limited partnership

- grandfathering of pre-October 1989 condominium project, 336(5)
- reduction in FST new housing rebate, Federal Sales Tax New Housing Rebate Regulations s. 3(b)(iii)(A)
- HST grandfathering of pre-October 1996 condominium project, 351(7); TIB B-077

Liquid methanol, see Methanol, liquid

Liquidator, see Receiver

Liquor, see Alcoholic beverages

List, see Lists

Listed financial institution, see also Financial institution

- bad debt on accounts receivable purchased within corporate group, 231(2)
- constitutes specified person for notices of objection, 301(1)
- defined, 123(1), 149(1)(a); Memo 17-6
- election for exempt supplies within corporate group, 150

Listed financial institution (cont'd)

- employee of, ineligible for income tax-based rebate, 253(1)
- not eligible for public service body rebate, 259(3)
- not eligible for transitional credit, 346(1)
- notice of objection restrictions, 301(1), (1.2)
- registration permitted, 240(3)
- · reporting period of
- annual, 245(2)(a)(iv)
- • monthly, 245(1), 245(2)(a)(iv)
- required to disclose detail on notice of objection, 301(1.2)
- return deadline, 238(1)(a)(i), 238(2.1)(b)
- selected, see Selected listed financial institution
- two-year limit for input tax credit claims, 225(4)(a)(i)

Listed international agreement

- defined, 123(1)
- demand for information for purposes of, 289(1)
- disclosure of information by official in accordance with, 295(5)(n)

Lists

- dollar amounts, see Dollar amounts in legislation and regulations
- excise tax rates, Memo 800-4
- interest rates, 124 (Analysis); Interest Rates (Excise Tax Act) Regulations
- policy papers, "Policy Statements" tab (Binder C1)
- provincial government entities, 122
- CRA officials, "Government Directory" tab (Binder C1)

Literacy organizations, rebate, 259.1; Memo 13-4

Literary presentation, see Place of amusement

Litigation, see also Lawyer: services of

- application of HST, New Harmonized Value-added Tax System Regulations s. 27; New Harmonized Value-added Tax System Regulations, No. 2, ss. 14, 25
- awards or settlements, 182; Policy P-218R
- conducted in Canada, whether taxable, VI-V-23; Memo 4-5-3 paras. 87–90; Policy P-206
- conducted outside Canada, non-taxable, 217"imported taxable supply"(a)(vi)
- when commenced, Memo 4-5-3 paras. 87-90; Policy P-206

Livestock, zero-rated, VI-IV-1, 2, see also Agriculture and fishing, zero-rated

Llamas, zero-rated, VI-IV-1; Memo 4-4 para. 5; Policy P-040 (obsolete)

Lloyd's association

- continuation of, 149.1
- defined, 123(1)
- Division IV tax on imported taxable supplies, 217.1(9)–(12)

Loading

- · defined, for importation of service from foreign branch, 217
- services, incidental to freight transportation, Memo 28-2 paras.
 22, 24, 30

Loan, see Lending of money

Loan corporation

• financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 26

Local authority, see also Para-municipal organization

• designated as municipality, 123(1)"municipality"(b)

Local municipality

- defined, V-VI-1
- supplies to other municipal entities, exempt, V-VI-28

Location

• ordinary, see Ordinary location (of property)

Locomotion, aid to, for disabled, zero-rated, VI-II-14; Memo 4-2 para. 22

Locomotive, see Railway: equipment and rolling stock

Locum, for medical practitioner, Policy P-238

Lodging, see also Accommodation

· house, meaning of, Policy P-099

Log boom

• whether "conveyance or cargo container", Policy P-067R

Long-haul truck driver

- defined, ITA 67.1(5)
- food and beverages, percentage of ITC allowed, 236(1)(b)(ii); Memo 8-2 paras. 51–52, 54

Long-term lease

- defined, 254.1(1); Memo 19-3-2 para. 2(c)
- · home sold with
- • exempt, V-I-5.1; Memo 19-2-2 paras. 40-43
- • new housing rebate, 254.1(2)(a)(i); Memo 19-3-2

Loss offset program (excise tax transportation rebates), 68.4; Memo 800-1 paras. 21–23

Lots, sale of, see Land; Serviced lots

Lottery, Memo 500-6-10, see also Bets; Game of chance

- constitutes game of chance, 123(1)"game of chance"
- prescribed lottery corporation
- • excluded from public service body rebate, 259(3)
- • transactions with ticket distributors ignored, 188.1
- • treatment of, 188(5), 188.1; Games of Chance (GST/HST) Regulations; TIB B-018
- right to play, sold by charity or non-profit organization, exempt, V-VI-5.1
- terminal, see Gaming machine
- ticket distributor, ignored for GST purposes, 188.1

Luggage, see Baggage

Lumber

 processing facility, joint venture election, Joint Venture (GST/HST) Regulations s. 3(1)(p)

Luxury automobile

 limitations on input tax credit, 201, 235; Memo 8-2 paras. 23–30, 42–49

Lyf

• treated as taxi, 123(1)"taxi business"; Info Sheet GI-196

Lymphedema

• extremity pump or intermittent pressure pump for use in treating, zero-rated, VI-II-21.1; Memo 4-2 paras. 32, 33

M

MUSH sector, see Municipality; University; School: authority; Hospital: authority

Maa-nulth First Nations

• no longer eligible for Indian Act relief, Notice 263

Machinery, see Equipment

Machine-readable records, see Books and records: computerized

Made available in/outside Canada

· meaning of, Policy P-078R

Made in Canada, see Place of supply

Made outside Canada, see Place of supply

Magazine

- · advertising, see Advertising
- supplied by non-resident, 143.1, VII-7.1; Publications Supplied by a Non-resident Registrant (GST/HST) Regulations
- • soliciting orders in Canada, 240(4)
- • subscription agent considered supplier, Policy P-185R

Mail

- constitutes delivery in a province, IX-II-3
- date of mailing presumed to be date of notice or demand, 335(10)
- delivery of, constitutes freight transportation service, VI-VII-1(1); Memo 28-2 paras. 64, 80–90
- electronic, see Telecommunication service
- export by, zero-rated, VI-V-12; Memo 4-5-2 paras. 39, 42
- goods delivered to Canada by, where value not more than \$20
- books, magazines and newspapers, 143.1; Publications Supplied by a Non-resident Registrant (GST/HST) Regulations
- • whether tax on importation, VII-7, VII-7.1; Mail and Courier Imports (GST/HST) Regulations; Postal Imports Remission Order
- HST on stamps, IX-VII; Memo 28-2 paras. 80-90
- · postal service
- • HST on, IX-VII; Memo 28-2 paras. 80–90
- zero-rated, VI-VII-6, 7, VI-V-22; Memo 4-5-3 para. 13; Memo 28-2 para. 64
- postmark as evidence of date of mailing, Memo 300-6-2 para.
- proof of service by, 335(1)
- sending by, deemed received when sent, 334(1)
- • exception for payments or remittances, 334(2)
- solicitation of orders in Canada by, 240(3)(b), (4)

Mailing address

 used as basis for determining residence in a province for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 5(a)

Mainframe computer

 memory boards and channels removed from, no FST rebate, Policy P-127

Maintaining books and records, see Books and records

Maintenance

- bond, see also Construction: bond
- contract
- • parts held for, no FST inventory rebate, 120(2.1)
- • software, TIB B-090
- • taxable, 123(1)"insurance policy"(a), see also Warranty
- conveyance imported for, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(f)
- goods imported for, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(c)
- lottery corporation, by, of equipment used by distributor, deemed not a supply, 188.1(4)(a)(iii)
- medical device, zero-rated, VI-II-34; Memo 4-2 para. 62
- national, place of supply for HST, Policy P-219
- professional status
- • continuing education courses exempt, V-III-6; Memo 20-4
- • dues to organization exempt, V-VI-18
- roads, joint venture election, *Joint Venture (GST/HST)* Regulations s. 3(1)(k)
- service supplied to unregistered non-resident carrier, zero-rated, VI-V-2; Memo 4-5-3 para. 29; Policy P-076
- tangible personal property, place of supply for HST
- after April 2010, New Harmonized Value-added Tax System Regulations s. 29
- water distribution, sewage or drainage system, exempt, V-VI-22

Maintenance bond, see also Construction: bond

• meaning of, Memo 17-1 para. 20

Make-up gas, defined, 153(6)(b)

Making a return, see Return

Malt

- beverages (non-alcoholic), taxable, VI-III-1(c); Memo 4-3 paras. 17–18
- liquor, taxable, VI-III-1(a); Memo 4-3 para. 9

Mammography, see Radiological services

Management, place of, 123(1)"permanent establishment"(a)(i)

Management company

- effect of use of, 123(1)"exempt supply" (Analysis)
- for health care, Policy P-238
- law firm, acceleration of input tax credits, Policy P-003

Management or administrative service

- defined, 123(1); TIB B-105
- excluded from exempt financial services, 123(1)"financial service"(q)(i)
- HST rebate to investment plan or segregated fund where service used outside the HST zone, 261.31(1) [repealed]

Management service, see Management or administrative service

Management services

- excluded from financial services, 123(1)"financial service"(q)
- intra-company cost allocations of insurance companies, Policy P-126
- rebate of provincial portion of HST, financial institution, 261.31(2); New Harmonized Value-added Tax System Regulations, No. 2, s. 21.1

Manager (of investment plan)

- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1)
- election to file plan's returns, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 53; Notice 260
- election to transfer plan's net tax adjustments to, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 55; Notice 260

Mandatary, see Agent

Mandate, see Agent

Mandatory registration, *see* Registration (for GST/HST): required

Manitoba

 provincial government entities that pay no GST, 122 (Analysis); Memo 18-2 paras. 26–28

Manual, see Owner's manual

Manufacturer

- licensed, transitional rule re GST, 337(7)
- mobile home, 123(1)"builder"(c)
- rebate to consumer, 181.1; Memo 300-7-6
- repeal of FST, transitional rules, 118
- supply of property on behalf of non-resident, 179, 180

Manufacturing

• defined, Games of Chance (GST/HST) Regulations s. 5(1)

Manufacturing service

· exporter, see Inward processing

Manure

 zero-rated as fertilizer when sold in bulk, VI-IV-5; Memo 4-4 para. 30

Manuscript, rare, see Specified tangible personal property

Maple-sugar candy, taxable, Memo 4-4 para. 2

Mare

• pregnant, urine of taxable, Memo 4-4 para. 2

Margin for risk transfer

• defined, for Division IV tax on financial institutions, 217

Marine animals, zero-rated, VI-IV-8; Memo 4-4 para. 34

Marine insurance policy

- adjusting services, exempt, 123(1)"financial service"(j)(i)
- apportionment of risks for zero-rating, Policy P-011

Marine vessel, see Ship or boat

Marketing

- of fertilizer, joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(h)
- of output, joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(c)

Market research

 excluded from exempt financial services, 123(1)"financial service"(r.4)(ii)

Market value, see Fair market value

Markevich case overruled, 313(2.1)–(2.8)

Marriage breakdown

• exception to joint liability on transfer of property, 325(4)

Marriage certificate, supply of, exempt, V-VI-20(d)

Marshmallows, taxable, VI-III-1(e); Memo 4-3 para. 45

Mask, see Face mask, zero-rated

Master pension entity

• defined, 123(1)

Master pension factor

• defined, 123(1)

Master pension group

• defined, 172.1(1)

MasterCard fees to banks, taxable, 123(1)"financial service"(r.6)

Mathematical formula, treatment of negative amounts in, 125

Maximum amounts, *see* Dollar amounts in legislation and regulations

Meal replacement bars, zero-rated, VI-III-1; Memo 4-3 paras. 160–162

Meals, see also Catering service

- allowance or reimbursement for, Memo 9-3 para. 53; Memo 9-4 para. 38; Memo 400-3-3
- · expenses
- • incurred by employee, rebate for, 253; Memo 500-4-6
- ••• unvouchered, Policy P-028 (obsolete)
- input tax credit limited to 50%, 236(1); Memo 8-2 paras.
 50–67
- • exception for charities, 236(2)
- ••• special rule for long-haul truck drivers, 236(1)(b)(ii)
- on Wheels, exempt, V-V.1-4, V-VI-15
- Ontario/BC HST input tax credit denied to large business, 236.01; New Harmonized Value-added Tax System Regulations, No. 2, s. 28(1)(h)
- preparation of, homemaker service, exempt, V-II-13
- school cafeteria, exempt, V-III-12; School Cafeteria Food and Beverage (GST/HST) Regulations; Memo 20-5; TIB B-026
- supplied with rent, exempt, V-I-6.2; Memo 19-2-2 para. 9
- university or public college, under meal plan, exempt, V-III-13: Memo 20-5

Mechanical percussor for postural drainage treatment, zerorated, VI-II-6; Memo 4-2 para. 11

Mechanics' tools, see Apprentice mechanics' tools

Meda

- awarded outside Canada or participating provinces
- • no GST on importation, VII-2
- • no HST on bringing into participating province, X-I-11
- imported for award in Canada, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(k)

Media (computer), *see* Computer: software; Carrier media; Computer carrier media

Medical

- device, zero-rated, VI-II; TIB B-022, B-061; Memo 4-2, see also specific devices by name
- • cosmetic service supply excluded, VI-II-1.2
- • defined, Streamlined Accounting (GST/HST) Regulations s.

Medical (cont'd)

- must be designed for human use and for assisting individual with disability or impairment, VI-II-1.1
- • parts or accessories for, VI-II-32; Memo 4-2 para. 61
- drugs, zero-rated, VI-I; Memo 4-1
- · equipment
- • institutional health care service, exempt, V-II-1, 2
- lease to consumer on order of medical practitioner, exempt, V-II-3
- insurance, 123(1)"insurance policy"
- · locums, Policy P-238
- management company, 123(1)"exempt supply" (Analysis)
- · mask, zero-rated, see Face mask, zero-rated
- oxygen, zero-rated, VI-I-2(e)(ix)
- practice
- • payments made within, Policy P-238
- • sale of, 167(1); Memo 14-4 para. 28
- practitioner (physician or dentist), see also Practitioner
- · · defined
- • health care services, VI-II-1
- medical and assistive devices, VI-II-1"specified professional"
- prescription drugs, VI-I-1
- • medico-legal reports by, Policy P-256
- • payments to other practitioners, Policy P-238
- • services exempt, V-II-5; Policy P-238
- · prosthesis
- exempt when supplied in health care facility, V-II-1"institutional health care service"(b)
- • zero-rated, VI-II-25, 26; Memo 4-2, paras. 43, 44
- services, see Health care services, exempt
- supplies
- • institutional health care service, exempt, V-II-1, 2

Medical device, see Medical: device

Medico-legal reports, Policy P-256

Member

• defined, Offset of Taxes (GST/HST) Regulations s. 2

Membership, see also Association; Club

- club, no input tax credit for dues or right to acquire, 170(1)(a);
 Memo 8-2 paras. 2-7
- conditional on owning security, not financial service, 140
- defined, 123(1)
- · golf club, securities issued by, Policy P-098R
- · lifetime, supply of, transitional rule
- GST, 345
- • HST (1997), 356(6); TIB B-077
- • Nova Scotia HST (2010), Nova Scotia HST Regulations s. 7
- place of supply for HST
- • after April 2010, New Harmonized Value-added Tax System Regulations ss. 6–11
- supplied with share, not financial service, 140
- supply of
- by charity, for recreational or athletic activity, whether exempt, V-V.1-1(f), V-V.1-1(g), V-VI-2(j), 12
- • by public sector body, exempt, V-VI-17, 18
- by public service body, for classes or activities for children, underprivileged or disabled, V-VI-12

- • by registered party, V-VI-18.1
- trade union, dues not taxed, 189

Memoranda, see "Memoranda" tab (Binder P3)

Memorial (certificate to enforce judgment on land), 316

Memory boards

 removed from tax-paid computers, no FST rebate, Policy P-127

Menstrual cup, see Feminine hygiene product

Mental disability, see Disabled person or disabled individual

Mental institution, see Health care facility

Merchandising allowance

• treated as adjustment to consideration, 232.1

Merger, see Amalgamation

Messuages, 123(1)"real property"(b)

Metals, see Precious metal

Meter, blood-glucose, zero-rated, VI-II-28; Memo 4-2 para. 46

Metered dose inhaler, VI-II-5.1; Memo 4-2 paras. 8, 9

Methanol, liquid

• production from natural gas, joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(n)

Metropolitan authority, see Municipality

Mexico

- courier import up to \$40 from, no tax on importation, VII-7.01
- temporary importations from
- • no GST on importation, VII-1
- • no HST on bringing into participating province, X-I-8

Midwife

- health care practitioner, V-II-1"practitioner"
- services exempt, V-II-7

Military, see Armed forces

Military stores and arms

- no GST on importation, VII-1
- no HST on bringing into participating province, X-I-1, 4

Milk, Info Sheet GI-036

- based beverages, zero-rated, VI-III-1(d); Memo 4-3 paras. 20–22
- chocolate milk, single serving taxable, VI-III-1(n); Memo 4-3 paras. 32–34
- dispensed, taxable, VI-III-1(o.4); Memo 4-3 para. 120
- equipment for producing, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(g)(i), (v), (vi); Memo 4-4 Schedule
- ice, see Ice milk, taxable
- products, zero-rated as food, VI-III-1; Memo 4-3 para. 5
- single servings, zero-rated, VI-III-1(n); Memo 4-3 paras. 27–34, 76
- sold in vending machine, taxable, Memo 4-3 para. 120
- zero-rated, as food, VI-III-1, 1(n); Memo 4-3 para. 27

Mine, constitutes permanent establishment, 123(1)"permanent establishment" (a)(ii)

• supply of undivided working interest in, Policy P-128R2

Mineral

• defined, 123(1)

Mineral (cont'd)

- · exploration or exploitation of
- • definition of "Canada", 123(2); Policy P-152R
- • joint venture election, 273
- • supply of right to, deemed not a supply, 162(1); Policy P-
- extraction of, place constitutes permanent establishment, 123(1)"permanent establishment"(a)(ii)
- feed, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(2)(a); Finance news release 93-039
- right to take or remove
- • supply for consumer use taxed, 146(c), 162(2), V-VI-20(k)
- • supply to registrant not taxed, 162(1); Policy P-110R

Mini-home

 whether mobile home, residential unit or residential complex, Memo 19-3-7 paras. 10–16; Policy P-104R

Minimal amounts

• under \$2, not payable or refundable, 297.1; TIB B-100

Minimum amounts, *see* Dollar amounts in legislation and regulations

Minimum fine not to be reduced by court, 331

Mining activity (crypto)

- deemed not commercial activity, 188.2(2), (3), (4); Notice 324
- • exception, 188.2(5)
- defined (re cryptoassets), 188.2(1)

Mining equipment

 supplies by auction, election, 177(1.3); Property Supplied by Auction (GST/HST) Regulations s. 1(d)

Mining group

• defined (re cryptoassets), 188.2(1)

Mining group operator

• defined (re cryptoassets), 188.2(1)

Mining payment

• defined (re cryptoassets), 188.2(1)

Minister (of National Revenue)

- defined, 123(1)
- delegation of powers, 275(3)
- · duties, see Due dispatch, required by Minister

Mink, taxable, Memo 4-4 para. 7

Miquelon, air travel to not zero-rated, VI-VII-1(1) "taxation area", VI-VII-3(a); Memo 28-3 para. 18

Misrepresentation, see also Offences; Penalties

• no time limit for reassessment, 298(4)

Mistaken payment of tax

- input tax credit for, 296(2.1)
- rebate of, 261

Misuse of statutory provisions

• general anti-avoidance rule, 274(4); TIB B-046

Mixed pension plans

 financial institution percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 38

Mixed supplies, see Combined supply

Mixed-use building

• new housing rebate, Memo 19-3-7 paras. 19-22

Mobile home, see also Residential trailer park

- British Columbia HST, Info Sheet GI-081
- constitutes personal property for certain rules, 142(3)(b), 220.01, VI-V-24, IX-I-2; Memo 4-5-2 para. 50; Memo 19-1 paras. 48–50
- constitutes real property, 123(1)"real property"(c)
- constitutes residential complex, 123(1)"residential complex"(a), (c.1)
- constitutes residential unit, 123(1)"residential unit"(a)
- construction of, timing rule, 190.1(1)
- dealer, treated as builder, 123(1)"builder"(c); Memo 19-2 paras. 1–5
- defined, 123(1); Memo 19-2 paras. 9–13; Memo 19-3-7 paras. 10–16; Policy P-104R, Policy P-223
- excluded from FST new housing rebate, 121(1)"specified single unit residential complex"
- foundations and support mechanisms, Policy P-070R
- lease of land for, exempt, V-I-7; Memo 19-2-2 para. 14
- manufacturer of, 123(1)"builder"(c)
- mini-homes, Memo 19-3-7 paras. 10-16; Policy P-104R
- motor homes, Policy P-104R
- new housing rebate, 256(2.2)
- Ontario HST, Info Sheet GI-082PEI HST, Info Sheet GI-145
- park model trailers, Memo 19-3-7 paras. 10-16; Policy P-104R
- prefabricated, Policy P-223
- rebate for, 254(2), 256(2.2); Memo 19-3-7 paras. 17-18
- removed from HST province, rebate of provincial tax, 261.1;
 TIB B-080
- substantial renovation of, timing rule, 190.1(2)
- supplier of, 123(1)"builder"(c)
- support mechanisms, Policy P-070R
- travel trailers, Policy P-104R
- used, no HST, X-I-25
- whether manufacture and assembly substantially complete, Policy P-223

Model trailer (in park)

 whether mobile home, residential unit or residential complex, Policy P-104R

Modem, possibly zero-rated, VI-II-2

Modification

• medical device, of, zero-rated, VI-II-34; Memo 4-2 para. 62

Molasses

 fruits, seeds, nuts or popcorn coated with, taxable, VI-III-1(e); Memo 4-3 paras. 45–54

Molds, dies, jigs, tools and fixtures

 supplied to non-resident, zero-rated, VI-V-14; Memo 4-5-2 paras. 51-52

Money, *see also* Dollar amounts in legislation and regulations; Financial service(s); Lending of money

- bringing into HST province, no HST self-assessment, X-I-17
- broker of, constitutes financial institution, 149(1)(a)(iii)
- business of lending, 149(1)(a)(viii)

Money (cont'd)

- considered TPP for zero-rated export rules, VI-VII-1(1)"tangible personal property"
- defined, 123(1)
- garnishment of, 317
- · importation of, no tax, VII-10
- issue, transfer, lending etc. of, 123(1)"financial service"(a)
- paid to Her Majesty, statutory recovery rights only, 312
- payment of not a supply, 123(1)"property", 123(1)"service"(b)
- seized from tax debtor by police, 320
- trader of, constitutes financial institution, 149(1)(a)(iii)
- · value of consideration, see Consideration

Monitor

- for blood glucose, zero-rated, VI-II-28; Memo 4-2 para. 46
- respiratory, see Respiratory monitors, zero-rated as medical devices

Monoselector devices, calculation of tax, 165.1(2)

Month, see also Fiscal month

- defined, 123(1)
- • for value of imported goods, Value of Imported Goods (GST/HST) Regulations s. 2(2)

Monthly compounding of interest, see Interest

Monthly filing, see Fiscal month

Mooring facilities for floating home, exempt, V-I-13.2; Memo 19-2-2 para. 22

Mortgage, see also Debt; Debt security

- buydowns, Memo 19-1 para. 56
- granting of, exempt, 123(1)"financial service"(d)
- takes priority over deemed GST security, Security Interest (GST/HST) Regulations s. 2

Mortgage investment corporation, *see also* Distributed investment plan

- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(c)
- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)

Mortgagee

• deemed to be builder, 123(1)"builder"(b)

Motel, see also Accommodation; Hotel

• meaning of, Policy P-099

Mother of pearl, articles made of

• excise tax on, I-5(b); Memo 800-1

Motive fuel, see also Fuel

- excluded from non-resident business rebate for goods exported, 252(1)(c)
- included in "specified property or service" for Ontario/BC HST ITC recapture, New Harmonized Value-added Tax System Regulations, No. 2, s. 28(1)(b)

Motor fuel, see also Fuel; Motive fuel

- defined, for B.C. point-of-sale rebate, *Deduction for Provincial Rebate (GST/HST) Regulations* s. 1
- point-of-sale rebate, *Deduction for Provincial Rebate* (GST/HST) Regulations Sch. 4, s. 10 [repealed]

Motor home, see also Residential trailer park

- excluded from definition of "mobile home", 123(1)
- lease of land for, V-I-7(b); Memo 19-2-2 para. 16

- rented, temporary importation of by Canadian resident, calculation of tax, *Value of Imported Goods (GST/HST) Regulations* s. 15:A(a)(ii)
- whether mobile home, residential unit or residential complex, Policy P-104R

Motor vehicle, see also Automobile; Specified motor vehicle

- allowance paid to employee or partner, 174(a)(ii); Memo 9-3; Policy P-075R
- · auxiliary driving control
- • addition of, see Conversion: of vehicle for use by disabled
- • zero-rated, VI-II-18; Memo 4-2 para. 26
- buy-back of under Ontario Arbitration Plan, Policy P-036
- conversion for use by disabled person, see Conversion: of vehicle for use by disabled
- · defined
- for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)
- for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 26; see also Qualifying motor vehicle
- expenses, rebate for employees and partners, 253; Memo 500-
- • where reasonable allowance received, Policy P-113R
- ferry for, charges exempt or zero-rated, V-VIII-1, VI-VII-14; Memo 28-1
- · HST on, see Specified motor vehicle
- qualifying, see Qualifying motor vehicle
- specified, see Specified motor vehicle
- supplies by auction, election, 177(1.3); Property Supplied by Auction (GST/HST) Regulations s. 1(c)
- wheelchair ramp for, zero-rated, VI-II-16; Memo 4-2 para. 46
- installation of, see Conversion: of vehicle for use by disabled

Moulds, jigs, dies, tools and fixtures

• supplied to non-resident, zero-rated, VI-V-14; Memo 4-5-2 paras. 51–52

Mousse, taxable in single servings, VI-III-1(n); Memo 4-3 paras. 27–34

Movable property, see Personal property

Movement of goods, see Freight transportation service

Movie

• theatre, see Place of amusement

Moving house from existing land, Memo 19-2-4 paras. 11–18; Policy P-154

Muffin

- bar, taxable, VI-III-1(m); Memo 4-3 paras. 93, 98–99; Info Sheet GI-020
- English, zero-rated, VI-III-1(m); Memo 4-3 paras. 88, 94, 137
- taxable where packaged less than six, VI-III-1(m); Memo 4-3 paras. 87, 89, 97, 118, 137

Mulchers, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(c)(xiv)

Mules, taxable, Memo 4-4 para. 7

Multi-employer pension plan

• rebate to, 261.01 [now available to all pension plans]

Multidisciplinary health care service, exempt, V-II-7.4

Multinational corporations

- permanent establishment in Canada deemed resident in Canada, 132(2)
- supplies between branches, 132(4), 220

Multiple servings

- cakes, muffins, cookies, etc., six or more, zero-rated, VI-III-1(m); Memo 4-3 paras. 87, 95–97
- pudding or beverages, zero-rated, VI-III-1(n); Memo 4-3 paras.
 27–34

Multiple supplies vs. single supply, Policy P-077R2, see also Combined supply

Multiple unit residential complex, *see also* Real property; Residential complex

- · addition to
- • builder of, 123(1)"builder"
- deemed not capital property, 195.1(2); Memo 19-2-3 para.
 103
- • deemed separate supply from rest of complex, 136(3)
- • self-supply rule, 191(4)
- • substantial completion of, defined, 191(9)
- conversion to condominium complex, V-I-4(a); Memo 19-2-1 paras. 35–36
- defined, 123(1); Memo 19-2 para. 14
- laundry machines exempt, V-I-13.3; Memo 19-2-2 paras. 23-24
- · new housing rebate for
- • FST rebate (transitional), 121(3); Memo 900-1
- GST rebate (for duplex), 254(1)"single unit residential complex", 254.1(1)"single unit residential complex"; Memo 19-3 para. 7
- Nova Scotia rebate (for duplex), 254(2.01)–(2.1); Memo 19-3-8 paras. 3–8
- • rental property, 256.2; TIB B-087
- • Ontario rebate, New Harmonized Value-added Tax System Regulations, No. 2, s. 47
- non-substantial renovation, 192; Memo 19-2-3 paras. 68-76
- remote work site, 191(7); Memo 19-2-3 paras. 51–58; Policy P-090
- self-supply by builder, tax on, 191(3), (5)
- substantial completion of, deemed, 191(9)
- supply exempt where tax already paid, V-I-2, 3, 5; Memo 19-2-1 paras. 26–39

Multi-tiered corporation, 186(3); Memo 8-6 paras. 14–16, *see also* Holding company

Municipal body, see also Municipality

- · defined, V-VI-1
- supplies to other municipal entities, exempt, V-VI-28

Municipal taxes

- unpaid, and redemption by previous owner, Policy P-198
- unpaid, sale of property by municipality, 183(10)
- • redemption by previous owner, 183(10.1), Policy P-198

Municipal transit service

- defined, V-VI-1, V-VI-24(c)
- exempt, V-VI-24

- **Municipality**, Memo 500-4-2, *see also* Government; Public sector body; Public service body
- apportionment of rebate where multiple capacities, 259(4.1), (7), (8)
- basic tax content of property of, 198.1(1)
- constitutes public sector body, 123(1)"public sector body"
- constitutes public service body, 123(1)"public service body"
- defined, 123(1); TIB B-046; Memo 500-4-2, see also Paramunicipal organization
- for public service body rebate, 259(1); Public Service Body Rebate (GST/HST) Regulations s. 2
- designated
- • activity, V-VI-1"designated activity", V-VI-28
- • credit to municipality for tax previously paid, 200.1
- • effective date of designation, Policy P-204 (obsolete)
- for public service body rebate, 259(1)"municipality", 259(4), (4.3)
- • for supply of water, V-VI-23; Info Sheet GI-011
- for water distribution, sewerage or drainage system, V-VI-
- • Newfoundland and Labrador, rebate to, 259(4.3)
- • property used in designated activities, *see* Designated municipal property
- • rebate of 100% of GST paid, 259(1)"specified percentage"(e), 259(4)(b)
- rebate of percentage of provincial portion of HST paid, 259(1)"specified provincial percentage", 259(4)(b); Public Service Body Rebate (GST/HST) Regulations s. 5(c)(v)
- • rent-geared-to-income housing organization, Info Sheet GI-
- • sale of passenger vehicle by, 203(4)
- • sale of personal property by, 141.2(2)
- • taxable even when sold by small supplier, 166(c)
- development charges, exempt, V-VI-20(c)
- excluded from definition of *de minimis* financial institution, 149(4.1)(a)(i); Memo 17-7 para. 5
- excluded from government, 123(1)"government"
- excluded from non-profit organization status, 123(1)"non-profit organization"
- expense allowance paid by, Policy P-097R2
- fees, see supplies by (below)
- funding by, see Funding by government
- infrastructure development, input tax credit entitlement, Policy P-168
- local, see Local municipality
- officer of, expense allowance, Policy P-097R2
- rebate for printed books, 259.1; Memo 13-4
- rebate of 100% of GST paid, 259(1)"specified percentage"(e), 259(3)(a); TIB B-025; Memo 500-4-2
- rebate of percentage of provincial portion of HST paid, 259(1)"specified provincial percentage", 259(3)(b); Public Service Body Rebate (GST/HST) Regulations s. 5(c)(v)
- sale of personal property by, 141.2(1)
- sale of property for unpaid municipal taxes, 183(10), (10.1), Policy P-198
- subsidized housing, calculation of self-supply tax, 191.1
- · supplies by
- certain supplies deemed in commercial activity, 146
- exempt, 189.1, V-VI-20, 21, 22, 23, 24, 25

Municipality (cont'd)

- • non-optional services exempt, V-VI-21; Policy P-177R
- • optional services exempt, V-VI-21.1
- to other municipalities or deemed municipalities, V-VI-28;
 TIB B-046
- supply by, public institution exemption does not apply, V-VI-2(n), V-VI-25
- taxes, exempt, V-VI-21

Munitions of war

- no GST on importation, VII-1
- no HST on bringing into participating province, X-I-1, 4

Museum, see also Place of amusement

- election to claim input tax credits on works of art, 176(6) [repealed]; Memo 400-3-6; TIB B-084
- exhibit, no tax on importation, VII-8; *Non-Taxable Imported Goods (GST/HST) Regulations* s. 3(c)

Music

- broadcasting rights, charges by collective, 177(2)
- classes or activities involving, exemption for, V-VI-12
- instruments, input tax credits and rebates, see Musical instrument
- lessons, exempt, V-III-9; Equivalent Courses (GST/HST) Regulations; Memo 20-6; TIB B-014
- performance, see Musician; Performing artist; Place of amusement

Musical instrument

- input tax credit for registrant
- • where used in business, 169(1), (2)
- • where used in employment or partnership, 199(5)
- rebate for employees and partners, based on CCA, 253

Musician, see also Performing artist

 employed, rebate for expenses and instrument costs, 253; Memo 500-4-6

Mutilation of documents, offence, 327(1)(b)(i)

Mutual fund

- · corporation
- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(d)
- services, 123(1)"financial service"(q)
- trailer commission servicing fees, whether financial service, Policy P-119
- trust
- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(x)

Mutual fund corporation, see also Distributed investment plan

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)

Mutual fund trust, see also Distributed investment plan

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)

Mutual insurance corporation

• group of, see Mutual insurance group

Mutual insurance federation

constitutes mutual insurance group, 123(1)"mutual insurance group"

• defined, 123(1)

Mutual insurance group

- defined, 123(1)
- investment fund member deemed to be corporation, 128(3)
- members deemed closely related, 123(1)"qualifying subsidiary"(c), 128(3), 150(7)(a)
- members deemed to have made election for exempt supplies, 150(7)(b)

Ν

N95 mask, zero-rated, VI-II-3

NATO, see North Atlantic Treaty Organisation

NETFILE, see Electronic filing

NSF cheque, see Cheque: dishonoured

NRRP Rebate (New Residential Rental Property Rebate), see Landlord's rebate

Naked trust, see Bare trust

Naloxone

• zero-rated, VI-I-2(e)(xi); Notice 305

Narcotic Control Act, drugs zero-rated, VI-I-2

National Energy Board

• cost-recovery fees to licensees, exempt, 189.1

National equipment maintenance contract

• place of supply for HST, Policy P-219

National Revenue, Department of, see also Revenue Canada

National standard

• defined, Deduction for Provincial Rebate (GST/HST) Regulations s. 1

Native Canadians, see Indians and Indian bands

Natural fruit juice products, zero-rated, VI-III-1(d); Memo 4-3 paras. 19–26

Natural gas, see also Continuous transmission commodity

- business, separate ITC allocation required, *Streamlined Accounting (GST/HST) Regulations* s. 21(2)
- exchange of at straddle plant, no GST, 153(6)
- liquid methanol production from, joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(n)
- liquids, defined, 153(6)(a)
- make-up gas, defined, 153(6)(b)
- production of liquid methanol from, joint venture election, 273(1)
- storage of, zero-rated, VI-V-15.3
- straddle plant, see Straddle plant
- supply for export by pipeline, zero-rated, VI-V-15; Memo 4-5-2 paras. 48, 49
- surplus, taking up, VI-V-15.3
- taking of excess, zero-rated, VI-V-15.3
- transportation by pipeline, joint venture election, *Joint Venture* (GST/HST) Regulations s. 3(1)(d)
- used as fuel for pipeline while exporting, zero-rated, VI-V-15(b); Memo 4-5-2 para. 48(b)

Natural gas liquids, defined, 153(6)(a)

Natural person, see Individual

Natural resource, see also Mineral

• amounts paid for, Policy P-105R, P-110R

Natural resource (cont'd)

- farm-out of resource property, Policy P-163 (obsolete)
- place of extraction constitutes permanent establishment, 123(1)"permanent establishment"(a)(ii)
- royalties not taxed, 162(1); Policy P-105R, P-110R

Naturopathic services, TIB B-109

- exemption for, V-II-7(m)
- practitioner of, V-II-1"practitioner"

Nav Canada, see Air navigation services

Nebulizers, zero-rated as medical devices, VI-II-5.2; Memo 4-2 para. 10

Negative adjustment amount

 defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 55(2)(c)

Negative amounts in formulas

• deemed to be nil, 125

Negligence

• payment for, not a supply, Policy P-218R

Nekaneet First Nation

• First Nations GST, Notice 277

Net, see Fishing: nets and equipment

Net-of-GST method, insurance claims, Memo 17-16; Policy P-091R

Net specified supplies, defined, *Streamlined Accounting* (GST/HST) Regulations s. 15(5.1)

Net tax, 225; Memo 500-2-4

- · additions to
- • automobile lease payments, 235(1); Memo 8-2 paras. 42-49
- • ceasing to be a registrant, 171(4)(b)
- • continuous transmission commodity not exported, 236.1
- • export certificate invalid, 236.2
- • export distribution centre certificate invalid, 236.2
- issuer of debit note, 232(3)(c); Memo 12-2; TIB B-042; Policy P-030R
- meals and entertainment expenses, 236(1); Memo 8-2 paras.
 50–67
- recipient of credit note, 232(3)(c); Memo 12-2; TIB B-042; Policy P-030R
- • recovery of bad debt, 231(3); Policy P-058R
- selected listed financial institution (re HST), 225.2(2), (3);
 TIB B-083R
- auditing to, 296(2), (2.1)
- calculation of, 225, 227; Memo 500-2-4
- deductions from
- • bad debts, 231(1), (2)
- • builder crediting new housing rebate to purchaser, 234(1)
- • certified institution employing disabled persons, 230.2(2)
- • goods returned after 1990, 337(9)(a) [repealed]
- • issuer of credit note, 232(3)(b); TIB B-042; Policy P-030R
- provincial point-of-sale rebate for publications, 234(3);
 Deduction for Provincial Rebate (GST/HST) Regulations
- • recipient of debit note, 232(3)(b); TIB B-042; Policy P-030R
- selected listed financial institution (re HST), 225.2(2), (3);
 TIB B-083R

- • supplier crediting amount to non-resident re convention or accommodation, 234(2)
- • supplier crediting installation rebate to non-resident, 234(1)
- • transitional credit for small business, 346, 347
- directors liable for failure to remit, 323
- · failure to remit, see Offences; Penalties
- interest on payment or refund, see Interest
- interim, see Interim net tax
- negative, refunded to registrant, 228(3), 229
- non-registrant, requirement to remit, 228(2), 228(4)
- overpayment of, refund or credit, 230, 296(3), (8)
- Quick Method election, 227(1); Streamlined Accounting (GST/HST) Regulations ss. 15–21; TIB B-028
- · refund, see Refund: of negative net tax
- requirement to remit, 228(2)
- returnable container, tax collected on not included, 226(3)
- simplified input tax credit calculation, 227(4.2); Streamlined Accounting (GST/HST) Regulations ss. 21.1–21.4; TIB B-070

Net worth assessment permitted, 299(1)

Netflix tax, see Non-resident e-commerce supplier (e.g., Netflix, AirBNB)

Network

- barter exchange, see Barter exchange network
- · seller, see Network seller

Network commission

• defined, 178(1)

Network seller, 178, Info Sheet GI-052, *see also* Direct seller; Qualifying network seller

- addition to net tax in lieu of interest following revocation, 236.5
- cancellation of sales representative registration, 242(2.3)
- defined, 178(1)
- host gifts, 178(9)
- joint election with sales representative, 178(1)
- qualifying, defined, 178(2)

Neuromuscular stimulation therapy

• device for, zero-rated, VI-II-41

New Brunswick

- causeway to Prince Edward Island, see Northumberland Strait Crossing
- HST rate, New Harmonized Value-added Tax System Regulations s. 33.4
- point of sale rebates (provincial exemptions), 234; *Deduction for Provincial Rebate (GST/HST) Regulations* Sch. 3
- provincial government entities pay HST, Memo 18-2 para. 23
- provincial sales tax, see Harmonized Sales Tax; Participating province
- public service body rebate, 259(3)(b)
- provincial rebate rate, Public Service Body Rebate (GST/HST) Regulations s. 5(c)

New goods, FST inventory rebate, 120(1)"tax-paid goods"

New harmonized value-added tax system

- defined, 123(1), 277.1(1)
- participating provinces, Sch. VIII
- regulations for, 277.1

New home purchase agreements

- assignment of, 192.1; Notice 323
- in Alberta, Memo 19-3-7 para. 1; Policy P-083
- in PEI, Info Sheets GI-144, GI-152

New home warranty issued by insurer, Policy P-257

New housing rebate

- British Columbia [until March 2013], 256.21; New Harmonized Value-added Tax System Regulations, No. 2, ss. 41(3), 43(2), 45(3), 46(3)(c), 47(4), 47(6), 47(8)
- calculation of when transferred to builder, Info Sheet GI-128
- • transfer to builder, Info Sheet GI-128
- transitional new housing rebate of estimated PST, New Harmonized Value-added Tax System Regulations, No. 2, ss. 56–57
- FST (transitional), 121; Memo 500-4-5-2, 900-1
- • assignment of rebate to builder, TIB B-010
- calculation of when transferred to builder, Memo 500-4-5-2; Policy P-042
- • condominium unit, 121(3)(b)
- • extension of deadlines, 121(2)(c), TIB B-049
- • form and deadline for application, 121(4)
- • general anti-avoidance rule, application of, 121.1
- • liability of builder, 121(2.1)
- • multiple unit residential complex, 121(3)(a)
- • percentage of completion of residential complex, Policy P-
- • regulations, Federal Sales Tax New Housing Rebate Regulations; TIB B-016
- • specified residential complex, 121(3)
- • specified single unit residential complex, 121(2)
- • transfer to builder, *Assignment of Crown Debt Regulations* s. 13(1); GST 500-4-5-2
- GST (permanent), 254–256, 256.2; Memo 19-3
- • amounts included in consideration for rebate, Memo 19-3-1 paras. 9–10; Policy P-052
- • building only, long-term lease of land, 254.1; Memo 19-3-2
- • calculation of when transferred to builder, Memo 19-3-1-1, 19-3-1-2; Policy P-042
- • cooperative housing corporation, 255; Memo 19-3-3
- • floating home, 254(2), 256(2.2)
- • Harmonized Sales Tax, Memo 19-3-8
- land sold before completion of residential complex, Memo 19-3-7 para. 1; Policy P-083
- • mixed-use building, Memo 19-3-7 paras. 19-22
- • mobile home, 254(2), 256(2.2)
- • owner-built home, 256; Memo 19-3-4
- • amounts eligible, Memo 19-3-4 paras. 10–17; Policy P-085
- • increase in rebate rate, Policy P-073
- • rental property, 256.2; TIB B-087
- • sale by builder, 254; Memo 19-3-1
- •• transfer to builder, 254(4), (5); Memo 19-3-1-1, 19-3-1-2
- HST, see British Columbia (above); Nova Scotia, Ontario (below); Prince Edward Island (below)
- Nova Scotia, Memo 19-3-8
- cooperative housing corporation (co-op) share, 255(2.01)–(2.1); Memo 19-3-8 paras. 15–16
- • floating home, 256(2.2)

- home on leased land, 254.1(2.01)–(2.1); Memo 19-3-8 paras. 13–14
- • home or duplex, 254(2.01)–(2.1); Memo 19-3-8 paras. 3–8
- limited to first-time buyer, 254(2.1)(b)(i), 254.1(2.1)(b)(i), 255(2.1)(b)(i), 256(2.1)(c)(i)
- • mobile home, 256(2.2)
- • owner-built home, 256(2.01)–(2.1); Memo 19-3-8 paras. 17–18
- Ontario, 256.21; New Harmonized Value-added Tax System Regulations, No. 2, ss. 41(2), 43(1), 45(2), 46(2)(c), 47(3), 47(5), 47(7)
- transitional new housing rebate of estimated RST, New Harmonized Value-added Tax System Regulations, No. 2, ss. 56–57
- · Prince Edward Island
- • transitional new housing rebate of estimated PST, *New Harmonized Value-added Tax System Regulations, No.* 2, ss. 58.09–58.11; Info Sheet GI-151

New registrant, see Becoming a registrant

New residential rental property rebate, see Landlord's rebate

Newfoundland and Labrador

- HST rate, New Harmonized Value-added Tax System Regulations s. 33.4
- offshore area, defined, 123(1)
- point of sale rebates (provincial exemptions), 234; *Deduction* for Provincial Rebate (GST/HST) Regulations Sch. 5
- provincial government entities pay HST, Memo 18-2 para. 23
- provincial sales tax, see Harmonized sales tax; Participating province
- rebate
- • designated municipalities, 259(4.3)
- • public service bodies, 259(3)(b), 259(4)(b)
- rebate of percentage of HST to public service bodies, *Public Service Body Rebate (GST/HST) Regulations* s. 5(c)
- rebate to municipalities, anti-avoidance rules, New Harmonized Value-added Tax System Regulations s. 58.47

Newsletter

 of public sector body, does not disqualify membership dues as being exempt, V-VI-17(f)

Newspaper

- advertising, see Advertising
- · box, see Coin-operated device
- carrier, Alternate Collection Method, Info Sheet GI-019
- mailed from outside Canada, 143.1, VII-7.1; Publications Supplied by a Non-resident Registrant (GST/HST) Regulations
- • subscription agent considered supplier, Policy P-185R
- · no HST in Ontario, see Qualifying newspaper
- point of sale rebate in Ontario, see Qualifying newspaper
- soliciting orders in Canada, 240(4)

Nil consideration

- election for supplies within corporate group, 156; Memo 14-5
- • effect on *de minimis* financial institution calculation, Memo 17-7 para. 29
- · supply for
- • exempt, V-V.1-5, V-VI-10
- • made to further or promote another endeavour, 141.01(4); Memo 8-3 paras. 29–30

Nitroglycerine (drug), zero-rated, VI-I-2(e)(vii)

Nominal consideration, supply for

- excluded from "consideration" re ITC eligibility, 141.01(1.1), 141.02(2); Memo 8-3 para. 21
- exemptions, V-V.1-5.1, V-VI-6-10, V-V-1-5.1
- made to further or promote another endeavour, 141.01(4);
 Memo 8-3 paras. 29–30

Nominee, see also Bare trust

- service in respect of securities
- supplied to Canadian resident, 217"imported taxable supply"(a)(iv)
- • supplied to non-resident, zero-rated, VI-V-17; Memo 4-5-3 para. 70

Non-alcoholic drinks, see Beverages

Non-arm's length, see also Arm's length

- corporation, garnishment of funds to be advanced to tax debtor, 317(2)(b)(ii)
- · supplies
- • deemed at fair market value, 155
- property delivered by registrant on behalf of non-resident, 179(1)(a)(ii)
- returnable containers deemed acquired at fair market value, 176(2)
- • used goods deemed acquired at fair market value, 176(4) [repealed]; Memo 400-3-6
- transactions with non-residents, disclosure of, 294
- transfer, joint liability for tax, 325(1)

Non-attributable input (for ITC allocation of financial institution)

- allocation of, 141.02(10), (11)
- defined, 141.02(1)

Non-capital property

• conversion to capital property, 196.1

Non-carbonated fruit juice beverages, whether zero-rated, VI-III-1(d); Memo 4-3 paras. 19–26

Non-credit courses, whether exempt, V-III-16

Non-creditable tax charged

• defined, 259(1)

Non-dairy ice cream substitutes

• taxable, VI-III-1(k); Memo 4-3 paras. 74–84

Non-financial institution

• financial services deemed related to commercial activities, 185,

Non-gaming activity

• defined, Games of Chance (GST/HST) Regulations s. 5(1)

Non-gaming reimbursement

• defined, Games of Chance (GST/HST) Regulations s. 5(1)

Non-gaming supply

• defined, Games of Chance (GST/HST) Regulations s. 5(1)

Non-optional municipal services

• exempt, V-VI-21; Policy P-177R

Non-participating province

- defined, 123(1)
- importation in, by resident of participating province, rebate, 261.2

Non-participating province indicator

• defined, for non-resident e-commerce, 211.11(2)(d)

Non-profit housing

• fair market value of, Policy P-165R

Non-profit organization, *see also* Charity; Public sector body; Public service body

- appropriation of property or services to benefit of member, 172(2)
- constitutes public service body, 123(1)"public service body"
- defined, 123(1), 259(1); Policy P-215
- employing disabled individuals in manufacturing, *see* Certified institution (employing disabled individuals in manufacturing)
- excludes municipalities and governments, 123(1)"non-profit organization"
- harbour authority, Info Sheet GI-008
- includes prescribed provincial government organization, 259(1)
- operating nursing home, constitutes charity for purposes of rebate, 259(1)"charity"
- qualifying
- • defined, 259(2), 259.1(1)
- • excluded from definition of *de minimis* financial institution, 149(4.1)(b); Memo 17-7 para. 5
- rebate of 50% of GST paid, 259(1)"specified percentage"(a), 259(3)(a); TIB B-025; Memo 500-4-9
- rebate of percentage of provincial portion of HST paid, 259(1)"specified provincial percentage", 259(3)(b); *Public Service Body Rebate (GST/HST) Regulations* s. 5(c)(i)
- supplies by, exempt, V-VI-4, 5-19, 25, 26

Non-qualifying pension entity

• defined, for pension plan rebate, 261.01(1); TIB B-XX4

Non-recourse loan, purchased from related corporation, bad debt on, 231(2)

Non-registrant

- filing of return, 238(2)
- net tax, calculation of, 225(1)
- proof of status, Memo 4-5-1; Policy P-009
- rebate on taxable sale of real property, 257; Memo 19-3-6
- reporting period, 245(1)
- requirement to remit tax, 228(2), 228(4)
- rights to natural resources, taxed, 162(2)
- sale of real property, rebate, 257; Memo 19-3-6
- seizure or repossession of goods from, input tax credit, 183(7); Policy P-156R
- small supplier, no tax on supply, 166
- transfer of property from on settlement of insurance claim, input tax credit, 184(4)

Non-resident

- books and records outside Canada, 286(1); Memo 15-1 para.
 18; Policy P-055R (obsolete)
- carrier, supplies to, zero-rated, VI-V-2; Memo 4-5-2 paras. 21–25; Memo 4-5-3 paras. 27–31; Policy P-076
- defined, 123(1), 132; Memo 3-4; Memo 4-5-1 paras. 3-14; Policy P-086R
- delegate to convention, supply to non-taxable, 167.2(1)
- · exhibitor at convention
- • rebate of tax paid, 252.3; Info Sheet GI-028
- • supply to non-taxable, 167.2(2)

Non-resident (cont'd)

- individual, Policy P-086R
- information in possession of, requirement on resident person to produce, 292
- insurer, with permanent establishment in Canada, 128(1)
- international shipping corporation, deemed, 132(5)
- · performer or lecturer
- • filing of return, 238(3); Policy P-134R
- • not eligible for small supplier status, 148(3)
- • required to register, 240(2); Memo 2-1 paras. 3–4; Memo 2-
- • supply not deemed made outside Canada, 143(1)(c)
- · permanent establishment of
- • deemed resident in Canada, 132(2)
- • insurer, effect of, 128(1)
- proof of status, Memo 3-4 Appendix A; Memo 4-5-1 Appendix A, B; Policy P-009
- real property, supply by, 221(2)
- rebate, 252–252.5
- accommodation in tour package before 2018, 252.1; Info Sheets GI-032, GI-033
- • artistic works produced for export, related supplies, 252(2)
- • assignment of, 252(3), 252.5; Info Sheet GI-032
- • deduction to supplier, 234(2), (2.1)
- • exhibitor at convention, 252.3; Info Sheet GI-028
- • goods exported by business, 252(1)
- • installation services, 252.41
- • restrictions on claiming, 252.2
- • timeshares excluded, 123(1)"short-term accommodation"(b)(i); Memo 19-2-4 para. 21
- registration of, Memo 2-4; TIB B-090
- • permitted, 240(3); Memo 2-3
- • required, 240(2), (4); Memo 2-1
- security required by, 240(6); Memo 2-6; Policy P-201
- supply by
- • admission to event, see performer
- • input tax credit claimable by other person, 180
- • real property, no requirement to collect tax, 221(2)
- • tangible personal property, to resident of HST province, 220.06; TIB B-079, B-XX5
- • warranty replacement parts, no tax on importation, VII-5
- • when deemed made outside Canada, 143(1)
- supply of property on behalf of, 179
- supply to, not taxed, Memo 4-5-1 para. 3; Memo 4-5-2; Memo 4-5-3
- advertising services, zero-rated, VI-V-8; Memo 4-5-3 paras. 48-50
- advisory services, zero-rated, VI-V-9; VI-V-23; Memo 4-5-3 paras. 51–54, 87–90
- agent's services, zero-rated, VI-V-5; Memo 4-5-3 paras. 23, 37–38, 90, 92
- • convention services, 167.2
- • electronic commerce, TIB B-090
- emergency repair services, zero-rated, VI-V-6; Memo 4-5-3 paras. 39–45; Policy P-067R
- • goods, 142(2)(a), VI-V-1, 12; Memo 4-5-2
- • services, zero-rated, VI-V-7, VI-V-23; Memo 4-5-3
- • supply made outside Canada, not taxed, 142(2)

- •• tangible personal property, 142(2)(a), VI-V-1, 12; Memo 4-5-2
- • warranty parts or repair service, VI-V-13; Memo 4-5-3 paras. 55–57
- whether supply made to non-resident, Memo 4-5-1; Policy P-005, P-009
- zero-rated, generally, VI-V-2, 5–10, 13, VI-IX-1, 2; Memo 4-5-1 para. 3; Memo 4-5-2; Memo 4-5-3
- tour operator
- rebate to before 2018, 252.1(3); Memo 27-3; Info Sheet GI-033
- transactions with, disclosure by corporation resident in Canada, 294
- trust, see Trust: non-resident

Non-resident e-commerce supplier (e.g., Netflix, AirBNB), 211.1–211.25

- consumer's place of residence determined, 211.11
- · currency for GST/HST remittance, 211.19
- · information return required annually
- • accommodation platform operator, 211.21
- • distribution platform operator, 211.25
- input tax credits disallowed, 211.17
- penalty for recipient of supply providing false information, 285.02
- registration required, 211.12(2), (3)
- reporting period (calendar quarter), 211.18(2)
- return required quarterly, 211.18(1), (2)
- supply allocated to distribution platform operator, 211.13(1), (2), 211.23
- supply deemed made in Canada, 211.14(1), (2)
- warehouse operator must disclose information to CRA, 211.24
- zero-rated supplies excluded from threshold calculation, 211.12(1)(a), (c)
- \$30,000 threshold for mandatory registration, 211.22(2)

Non-resident-owned investment corporation, see also Distributed investment plan

- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(e)
- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)

Non-stratified investment plan, see also Investment plan

- defined, for financial institution HST allocation rules
- • for investment plan HST rules re non-residents, 225.4(2); Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 1(1), 6(2)(a)
- election for real-time calculation, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 49(2)
- election to have 225.4(4) not apply, 225.4(7)
- financial institution's percentage, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 31, 32

Non-substantial renovation of real property

• effect of, 192; Memo 19-2-3 paras. 68-76

Non-taxable importations, 213, 213.2, VII, *see also* Importation: goods: no tax on

Non-taxable portion (of tour package)

- defined, 163(2), (3); Memo 27-1 para. 12
- zero-rated, VI-VI-1; Memo 27-1 para. 15

North Atlantic Treaty Organisation

- · publications of
- • no GST on importation, VII-1
- • no HST on bringing into participating province, X-I-1

North Shore Health Region case overruled, 191(3)(b)(i), (ii)

North Warning System

operation and maintenance of, joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(1)

Northumberland Strait Crossing

• exemption from HST for construction costs, 362

Northwest Territories

 territorial government entities that pay no GST, 122 (Analysis); Memo 18-2 paras. 26–28

Notary

 professional services excluded from financial services, 123(1)"financial service"(r)

Notice

- · of assessment, 300, see also Assessment
- of GST paid, 223, Disclosure of Tax (GST/HST) Regulations; TIB B-013
- of objection, 301, see also Objection (to assessment)
- detail required by large businesses and financial institutions, 301(1.2)
- • extension of time to file, 303, 304
- proof of service of, 335
- service of, 333

Notice of intent

• to register person who is unregistered, 241(1.3)

Notification of accounting periods, 243(3); GST Form 71; Memo 500-2-1

Notional input tax credit, see also Input tax credit; Trade-in of used property

- FST inventory rebate, 120(3)(b)
- on acquisition of used goods, 176(1) [repealed]; Memo 400-3-6; TIB B-084
- • elimination of, TIB B-084
- to creditor, on seizure of property, 183(7); Policy P-156R

Nova Scotia

- Harmonized Sales Tax rate (5%+9%), New Harmonized Valueadded Tax System Regulations s. 33.6
- · offshore area, see Nova Scotia offshore area
- point of sale rebates (provincial exemptions), 234; Deduction for Provincial Rebate (GST/HST) Regulations Sch. 2
- provincial government entities pay HST, Memo 18-2 para. 23
- provincial sales tax, see Harmonized sales tax; Participating province
- rebate
- new housing
- • cooperative housing corporation (co-op) share, 255(2.01)–(2.1); Memo 19-3-8 paras. 15–16
- • floating home, 256(2.2)
- • home on leased land, 254.1(2.01)–(2.1); Memo 19-3-8 paras. 13–14
- ••• limited to first-time buyer, 254(2.1)(b)(i), 254.1(2.1)(b)(i), 255(2.1), 256(2.1)(c)(i)
- • mobile home, 256(2.2)

- ••• owner-built home, 256(2.02)–(2.1); Memo 19-3-8 paras.
- • purchase of home or duplex, 254(2.01)–(2.1); Memo 19-3-8 paras. 11–12
- • public service bodies, 259(3)(b), 259(4)(b)
- rebate of percentage of HST to public service bodies, *Public Service Body Rebate (GST/HST) Regulations* s. 5(c)
- tax rate in, New Harmonized Value-added Tax System Regulations s. 33.6(1)
- transitional rules for 2010 rate increase 13% to 15%, Nova Scotia HST Regulations, 2010 s. 19
- transitional rules for 2025 tax decrease, New Harmonized Value-added Tax System Regulations ss. 58.65–58.68

Nova Scotia offshore area

- defined, 123(1)
- HST rate in, New Harmonized Value-added Tax System Regulations s. 33.6(2)

Novation

• meaning of, Policy P-249

Number

- export certificate, 221.1(4)
- export distribution centre certificate, 273.1(9)
- GST registration, 241(1)

Numbers, see Dollar amounts in legislation and regulations

Numismatic, see Coin

Nunavut

• territorial government entities pay GST, Memo 18-2 para. 23

Nurse

- can authorize various medical devices, VI-II-1"specified professional"
- services of, exempt, V-II-6

Nursing home, see also Health care facility; Residential care facility

- considered charity for rebate purposes, 259(1)"charity"
- excluded from definition of *de minimis* financial institution, 149(4.1)(a)(ii); Memo 17-7 para. 5
- intermediate care service, 259(1)"charity", V-II-1"health care facility"(c)
- services exempt, V-I-6, V-II-6, see also Health care services, exempt

Nursing service, exempt, V-II-6; Memo 300-4-2

Nuts

- coated or treated with chocolate, sugar, etc., taxable, VI-III-1(e); Memo 4-3 paras. 45–54
- mixed, taxable, VI-III-1(i); Memo 4-3 para. 60
- salted, taxable, VI-III-1(g); Memo 4-3 paras. 60–61; Info Sheet GI-021
- snack mixtures, taxable, VI-III-1(i); Memo 4-3 paras. 66-70
- zero-rated, generally, VI-III-1

0

OMEIOC, see Outlay made or expense incurred outside Canada

Oaths, administration of, 275(4)

Objection (to assessment), 301

- appeal to Tax Court if not accepted, 306
- books and records to be kept until disposed of, 286(4)

Objection (to assessment) (cont'd)

- · extension of time
- • by Minister, 303
- • by Tax Court, 304
- notice of, 301
- prohibited where right waived by taxpayer, 301(1.6)
- proof no objection filed, 335(6)
- security for payment while pending, 314(2)
- time limit for filing, 90 days, 301(1.1)

Obligation to collect tax

- Crown corporations, 122(c) [repealed]; Specified Crown Agents (GST/HST) Regulations; TIB B-012; Memo 18-2
- governments, 122; TIB B-006, B-036; Memo 18-2
- suppliers generally, 221

Occupational skills, courses to develop, exempt, V-III-1"vocational school", V-III-6, 8

Occupational therapy services

- constitutes institutional health care service, V-II-1"institutional health care service"(e)
- exemption for, V-II-7(i)
- practitioner of, V-II-1"practitioner"
- can authorize various medical devices, VI-II-1"specified professional"

Occupying property for residential purposes

- creates residential unit, 123(1)"residential unit"
- · new housing rebate
- FST (transitional), 121(1)"specified single unit residential complex"
- •• GST, 254(2), 254.1(2), 255(2), 256(2)
- meaning of, see Place of residence
- non-residential property, conversion, 190(1); Memo 19-2-3 paras. 80–84
- rent exempt, V-I-6; Memo 19-2-2 paras. 1-11
- self-supply rules, 191

Oceanic telegraph cable, supply to non-resident for use in laying or repair zero-rated, VI-V-2(c); Memo 4-5-2 para. 21(c)

Offal, whether zero-rated, Memo 4-3 para. 8

Offences, 326-332; Memo 16-2 paras. 66-76, see also Penalties

- confidential information, 328
- conspiracy, 327(1)(e)
- · corporate officers, directors and agents liable, 330
- disclosure of certain crimes by CRA to police, 295(5.04)
- electronic sales suppression software, 327.1, *see also* Zapper software (or hardware)
- failure to file return, 326(1)
- failure to pay, collect or remit tax, 329(1)
- false or deceptive written statements, 327
- general, 329(2)
- information or complaint, laying of, 332
- limitation period, eight years, 332(4)
- minimum punishment (fine) not to be reduced, 331
- officers of corporation subject to punishment, 330
- sales suppression software, 285.01, see also Zapper software (or hardware)
- search warrant where suspected, 290
- stay of appeal pending outcome of prosecution, 327(4)

 zapper software, 285.01, see also Zapper software (or hardware)

Offering memorandum

- defined, 336(6)
- grandfathering of limited partnership condominium project
- • GST, 336(5)
- • HST, 351(7); TIB B-077

Office

- defined, 123(1)
- at home, see Home office expenses

Office equipment, device to control, for disabled person, zero-rated, VI-II-8; Memo 4-2 para. 14

Office expenses

• incurred by employee, rebate for, 253; Memo 500-4-6

Officer, see also Employee; Police

- · defined
- • for non-taxable imported goods, *Non-Taxable Imported Goods (GST/HST) Regulations* s. 2
- • for solicitor-client privilege, 293(1)
- • generally, 123(1)
- • included as employee, 123(1)"employee"
- employer of, 123(1)"employer"
- hearing, appointment of, 276(2)
- · of corporation
- • guilty of offence when participated or acquiesced in, 330
- • may sign documents, 279(a)
- · of municipality
- • expense allowance paid to, 174; Policy P-097R2
- of Canada Revenue Agency
- • affidavit of proof of service, notice, etc., 335
- • delegation of powers to, 275(3)
- seizure of documents, procedure when solicitor-client privilege claimed, 293
- · of unincorporated body
- • liable to pay or remit tax for the body, 324
- may sign documents, 279(a)
- police, moneys seized from tax debtor, 320

Official

• defined, re communication of information, 295(1), 328(3)

Offset interest on instalment payments, 280(3); TIB B-100; Memo 16-2 paras. 14–18

Offset of taxes, see Set-off

Offshore activity

• defined, 123(1)

Off-the-shelf software, TIB B-037R; Policy P-150

Oi

- crude, see Continuous transmission commodity
- importation for refining, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(e)
- transportation of, pipeline or terminal operation qualifies for joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(q)

Oil or gas well, see also Mineral; Natural resource

• considered mineral deposit, 123(1)"mineral"

Oil or gas well (cont'd)

- constitutes permanent establishment, 123(1)"permanent establishment"(a)(ii)
- joint venture election, 273
- supply of undivided working interest in, Policy P-128R2

Oil shale

• included in definition of mineral, 123(1)"mineral"

Old age home, see also Nursing home

 rent and meals exempt, V-I-6, V-I-6.2; Memo 19-2-2 paras. 1-11

Olive oil

 zero-rated, VI-III-1; Policy P-240; Memo 4-3 para. 159 Example 3

Olympic Games and Paralympic Games

• no tax on participants' importations, 2010 Olympic and Paralympic Winter Games Remission Order

Omission

- in assessment, does not affect validity, 299(4), (5)
- in return, form, invoice, etc.
- • fine and imprisonment, 327(1)
- • penalty, 285

On-board charges, see Aircraft: in-flight supplies (same rules apply)

Ongoing service

• allocation of consideration to billing period, 136.1(2)

On-line sales, see Internet sales

Ontario

- · Arbitration Plan, effect of buy-back of vehicle, Policy P-036
- builders of new housing, Info Sheet GI-083
- · Harmonized Sales Tax, Sch. VIII
- large business temporary recapture of ITCs, New Harmonized Value-added Tax System Regulations, No. 2, s. 26"specified province"
- Lottery and Gaming Corporation, Games of Chance (GST/HST) Regulations s. 3(k)
- new housing rebate, 256.21; New Harmonized Value-added Tax System Regulations, No. 2, s. 41(2); Info Sheet GI-080
- point of sale rebates (provincial exemptions), 234; *Deduction for Provincial Rebate (GST/HST) Regulations* Sch. 1
- provincial government entities pay HST, Memo 18-2 para. 23
- purchasers of new housing, Info Sheet GI-077
- rebate of percentage of HST to public service bodies, *Public Service Body Rebate (GST/HST) Regulations* s. 5(c)
- recapture rate for large business temporary recapture of ITCs, New Harmonized Value-added Tax System Regulations, No. 2, s. 26"recapture rate"(a); Info Sheet GI-171
- residential care service provided in, Info Sheet GI-123
- Retail Sales Tax, determines value to apply HST on bringing vehicle into province, New Harmonized Value-added Tax System Regulations, No. 2, s. 8(a)
- status Indians, exemption from provincial portion of HST, Credit for Provincial Relief (HST) Regulations
- temporary input tax credit recapture, 236.01; New Harmonized Value-added Tax System Regulations, No. 2, ss. 26–38
- • phase-out, Info Sheet GI-171

Ontario regulation

• defined, Credit for Provincial Relief (HST) Regulations s. 1

Onyx, articles of

• excise tax on, I-5(b); Memo 800-1

Operated solely for non-profit purposes

• meaning of, Policy P-215

Operating corporation

- defined, 186(0.2)
- holding corp allowed to claim certain ITCs, 186(1)

Operating expenses (automobile)

calculation of employee benefit, 173(1)(d)(vi); Automobile
 Operating Expense Benefit (GST/HST) Regulations; Memo 9-2
 paras. 30–35, 56–57, Appendix B

Operative extent (for ITC allocation of financial institution)

• defined, 141.02(1)

Operator

- joint venture election, 273(1); Policy P-106
- tour, see Tour operator

Option

- for future supply of commodity, traded on exchange, constitutes financial instrument, 123(1)"financial instrument"(f); Memo 17-1 paras. 37–39
- for future supply of money, shares or other financial instrument, 123(1)"financial instrument"(i); Memo 17-1 para. 45-46
- to purchase property on lease
- • HST transitional rule (1997), 352(1.1)
- HST transitional rule (2010), New Harmonized Value-added Tax System Regulations s. 41(10)
- • HST transitional rule (2013, PEI), New Harmonized Valueadded Tax System Regulations s. 58.23(10)
- • place of supply for HST when exercised, 136.1(1.1)
- to purchase real property, 123(1)"real property"(b); Memo 19-5 paras. 63–68
- to purchase shares, constitutes equity security, 123(1)"equity security"

Optional municipal services

• exempt, V-VI-21.1; Policy P-177R

Optional registration, see Registration (for GST/HST): voluntary

Optometric services

- exemption for, V-II-7(a)
- practitioner of, V-II-1"practitioner"

Ordinary location (of property)

 deemed by mutual agreement, for HST place of supply rules before July 2010, IX-I-4

Organization, see Association; Unincorporated organization

Organized solely for non-profit purposes

• meaning of, Policy P-215

Organizer (of convention)

- defined, 123(1); TIB B-071; Memo 1-5; Memo 27-2 paras. 37-47
- · foreign convention
- rebate credited to sponsor by, 252.4(2); Memo 27-2 paras.
 72–93; Info Sheet GI-031
- rebate of tax to, 252.4(3); Memo 27-2 paras. 64–71; Info Sheet GI-030

Origin

 defined, for transportation services, VI-VII-1(1), IX-VI-1; Memo 28-2 para. 16; New Harmonized Value-added Tax System Regulations s. 20

Original supplier

• defined, re buying groups, 178.6(1); Memo 1-5

Orthodontic

- devices, zero-rated, VI-II-11.1; Memo 4-2 para. 19
- services, exempt (as dental services), V-II-5

Orthopaedic brace, zero-rated, VI-II-23; Memo 4-2 para. 39

Orthotic device

• zero-rated as medical device, VI-II-23; Memo 4-2 para. 39

Osteopathic services

- exemption for, V-II-7(f)
- practitioner of, V-II-1"practitioner"

Ostriches

- feed for, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(2.1)
- zero-rated, VI-IV-1; Memo 4-4 para. 5; Policy P-040 (obsolete)

Other body established by a government, Policy P-247

Other taxes, Memo 800

Outbound international freight, VI-VII-6, 7; Memo 28-2 paras. 63–67

Outdoor recreation

• for children, underprivileged or disabled, exempt, V-VI-12

Outlay made or expense incurred outside Canada (for additional Division IV tax on financial institutions)

- defined, 217.1(2)
- qualifying consideration in respect of, 217"qualifying consideration"

Outside Canada, place of supply, 142(2), 143, 144

· delivery of goods, Policy P-078R

Oven, see Appliance: kitchen

Overhaul, see also Repair

- conveyance imported for, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(f)
- goods imported for, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(c)

Overnight camp, not exempt, V-VI-12(a)

Overpayment

- of net tax
- • applied to another reporting period or refunded, 296(3)
- defined, 296(8)
- refund, 230
- of rebate, to be repaid by recipient, 264
- of refund, to be repaid by recipient, 230.1

Override rule, where supply completed, 168(3); Memo 300-6-11

Ovum, human, zero-rated, V-I-6

Owner's manual

- excluded from printed books rebate, 259.1(1)"printed book"(f)
- meaning of, Policy P-227 (obsolete)

Owner-built home, new housing rebate, 256, Memo 19-3-4

- amounts eligible for, Memo 19-3-4 paras. 10-17; Policy P-085
- British Columbia, New Harmonized Value-added Tax System Regulations, No. 2, s. 46; Info Sheet GI-081
- Ontario, New Harmonized Value-added Tax System Regulations, No. 2, s. 46; Info Sheet GI-082
- PEI, New Harmonized Value-added Tax System Regulations, No. 2, s. 58.28; Info Sheet GI-145

Owner-occupant

 defined, for Nova Scotia new housing rebate, 254(2.01), 254.1(2.01)

Ownership, transfer of, see also Supply; Taxable supply

- financial instrument, 123(1)"financial service"(d)
- · real property
- • exempt sale, no input tax credit available later, 225(5)
- • meaning of, Policy P-111R; 336(1) (Analysis)
- • new housing rebate, 254(2)(e), (3)
- • when tax payable, 168(5)
- tangible personal property, when tax payable, 168(3)
- under agreement of sale, constitutes sale, 123(1)"sale"

Oxygen, medical, zero-rated, VI-I-2(e)(ix)

P

PBRH, see Purpose-built rental housing

PEI, see Prince Edward Island

PRK, see Photorefractive keratotomy

PRPP, see Pooled registered pension plan

PRPP administrator

• defined, 123(1)

Package tours, see Tour package

Packaged in single servings

• meaning of, Policy P-213

Packages of six or more, see Single servings

Packing

- defined, for export distribution centres, 273.1(1)
- services, incidental to freight transportation, Memo 28-2 paras. 31–32

Painter, see Artist

Painting, see Specified tangible personal property

Pamphlet

• meaning of, for printed-book rebate, Policy P-234 (obsolete)

Pan American Games and Parapan American Games

• no tax on participants' importations, 2015 Pan American and Parapan American Games Remission Order

Pape

 processing facility, joint venture election, Joint Venture (GST/HST) Regulations s. 3(1)(p)

Para-municipal organization

- corporation or board, TIB B-046
- defined, V-VI-1
- supplies to other municipal entities, exempt, V-VI-28

Paralympic Games, see Olympic Games

Parent corporation, see also Holding company

- closely related groups, 123(1), 128
- input tax credit re shares or debt of subsidiary, 186(1); Memo 8-6; Policy P-032, P-094R, P-137
- qualifying subsidiary, defined, 123(1)

Pareve ice cream substitutes

• taxable, VI-III-1(k); Memo 4-3 paras. 74-84

Pari-mutuel betting, exempt, V-VI-5.2; Memo 500-4-6

Parity or advisory committee

• dues exempt, 189(c)

Park

- access or entry charge by government, taxed, 146(e), V-VI-20(1)
- · admission to, see Place of amusement
- authority, determination as municipality, 123(1)"municipality"(b); TIB B-046, see also Para-municipal organization
- model trailer, whether mobile home, residential unit or residential complex, Memo 19-3-7 paras. 10–16; Policy P-104R
- residential, see Residential trailer park
- trailer
- • residential, see Residential trailer park
- • use of, 163(3)"tour package"

Parking

- expenses incurred by employee, rebate for, 253; Memo 500-4-
- hospital, exempt, V-V.1-7, V-VI-25.1
- meter, disclosure of GST, 223(1); Disclosure of Tax (GST/HST) Regulations s. 2(3)
- permit supplied by municipality or government, exempt, V-VI-20(c)
- reimbursed by employer, taxable benefit, 173(1); Memo 9-2 paras. 30–32
- space
- • condominium unit (residential)
- • lease of, whether exempt, V-I-8.1(b); Memo 19-2-2 para.
- • sale of, whether exempt, V-I-8; Memo 19-2-1 paras. 47–48
- floating home owner, lease to, V-I-8.1(c); Memo 19-2-2 para. 20
- • lease or licence by charity, whether exempt, V-V.1-1(o)
- lease or licence by public institution or public sector body, not exempt, V-VI-10(b), V-VI-25(h)
- residential, lease exempt, V-I-8.1; Memo 19-2-2 paras. 18-20

Parliament, see Federal government; Government

Parochial school tuition, exempt, V-III-2; Memo 20-1

Part

- or accessory for medical device, zero-rated, VI-II-32; Memo 4-2 para. 61
- · warranty replacement, see Warranty: replacement parts

Partial payment, when tax payable, 168(2); Memo 300-6-7

Partial use in commercial activities, see also Input tax credit; Use: in commercial activities

• input tax credit for, 169(1), 169(2)

Participant in joint venture, election, 273

- administrative definition, Policy P-106
- input tax credits claimable by, Policy P-138R
- purchases and supplies on behalf of non-electing participants, Policy P-139R
- supply of space in co-owned building, Policy P-172R

Participating employer

- defined, 123(1)
- pension plan rebate, 261.01(1); TIB B-XX4

Participating in false statement or omission, see also Offences: Penalties

- member of unincorporated body guilty of offence, 324
- officer of corporation guilty of offence, 330
- penalty, 285, 327

Participating province, Sch. VIII

- bringing goods into, see Bringing into a participating province
- defined, 123(1), Sch. VIII
- direct seller rules, adjustments, 178.3(5), (6), 178.4(5), (6)
- · goods removed from
- • rebate, 261.1; TIB B-080
- • subsequent bringing back into province, X-I-21
- imported goods not for use in, rebate, 261.2
- intangible property not for use in, rebate, 261.3; TIB B-080
- new housing rebate, see Nova Scotia: rebate; new housing
- place of supply rules, see Place of supply: province
- Prince Edward Island included, New Harmonized Value-added Tax System Regulations s. 33.3(2)
- rebates, see Harmonized sales tax: rebate
- service not for use in, rebate, 261.3; TIB B-080

Participating province indicator

• defined, for non-resident e-commerce, 211.11(2)(c)

Participating provinces member percentage

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 7(4)(b)

Particular period

- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 16

Particulars of GST on documentation, see Disclosure of tax on invoices

Partnership, 272.1

- activities of, deemed not activities of partners, 272.1(1); Policy P-244
- appropriation of property for partner, 172(2), (3)
- automobile or aircraft of, 173(1), 202(2)–(4)
- benefit conferred on partner, 170(1)(c); Memo 8-2 para. 20
- Canadian, see Canadian partnership
- closely related, 156(1.1), (1.2); Memo 14-8
- common-law, see Common-law partner
- constitutes a person, 123(1)"person"
- continuation of predecessor partnership, 272.1(7)
- continuation until registration cancelled, 272.1(6)

Partnership (cont'd)

- corporate partner, deemed to carry on activities of partnership, 272.1(2)(b)
- disposition of property to partner, 272.1(4)
- · dissolution of
- • cancellation of registration, Memo 2-7 para. 3(c)
- election for nil consideration, 156(1.1)–(1.3); Memo 14-5 paras. 21–24; Memo 14-8
- financial institutions HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 20, 27
- fiscal year of partner may be same as, 244(2)
- · interest in
- • constitutes financial instrument, 123(1)"financial instrument"(d)
- • when not zero-rated, VI-IX-1(e)
- joint liability with partners for GST obligations, 272.1(5)
- meaning of, Policy P-171R; Memo 17-1 para. 25
- medical practice, Policy P-238
- partner deemed related to partnership, 126(3)
- · partner, whether acting on own behalf, Policy P-244
- payment to partner, whether deemed consideration, 272.1(3)
- person deemed associated with partnership, 127(3)(a)
- profit, expectation of, 123(1)"commercial activity"(b); Policy P-176R
- rebate to partners re tax-deductible expenses and CCA, 253; Memo 500-4-6
- registration of partner, Memo 2-1 paras. 14(b), (c); Policy P-216
- reimbursement of expenses to partner, 175; Memo 9-4; Policy P-075R
- resident in a province, deemed, 132.1(1)(b)
- resident in Canada, deemed, 132(1)(b)
- service on, 333(1)(a)
- · specified, see Specified partnership
- taxation year of, 123(1)"taxation year"(b)
- transfer to new partnership, 272.1(7)
- withdrawal of partner, 272.1(4)

Partridges

• zero-rated, Memo 4-4 para. 5

Party, see Registered party

Pass, transportation

 HST place of supply rules, New Harmonized Value-added Tax System Regulations s. 22

Passenger transportation service, VI-VII; Memo 28-3, see also Carrier: Travel

- domestic, zero-rated as part of international travel, VI-VII-2, 3; Memo 28-3 paras. 38–47; Policy P-037
- ferrying motor vehicles and passengers, Memo 28-1
- • exempt (domestic), V-VIII-1; Memo 28-3 paras. 29-37
- zero-rated (international), VI-VII-13; Memo 28-3 paras. 38–47
- HST on, New Harmonized Value-added Tax System Regulations ss. 21–22
- international, zero-rated, VI-VII-2, 3, 4, 5, VI-VII-13; Memo 28-3 paras. 38–47
- municipal transit, exempt, V-VI-24; Memo 28-3 paras. 31-35
- · pass, see Pass, transportation

- place of supply, for HST, New Harmonized Value-added Tax System Regulations ss. 21–22
- rebate of GST paid in error, Memo 28-3 paras. 48-49
- school bus services, exempt, V-III-5; Memo 28-3 para. 30
- tour packages, 163, VI-VI

Passenger vehicle, see Automobile

Pass-through supply

• defined, re buying groups, 178.6(1); Memo 1-5

Pastries, taxable where packaged less than six, VI-III-1(m); Memo 4-3 paras. 87, 89, 137

Patent

- supplied to non-resident, zero-rated, 142(2)(c), VI-V-10; Memo 4-5-3 para. 106
- • used in business in Canada, 217"imported taxable supply"(c.1)

Patient, supplies to by hospital or health care facility, V-II-2

Patient lifter for moving disabled persons, zero-rated, VI-II-15; Memo 4-2 para. 23

Patio platform for mobile home, Policy P-070R

Patronage dividend

- defined, 123(1)
- election not to retroactively reduce tax, 233(3), 233(4)
- payment of, excluded from financial service, 123(1)"financial service"(f)
- treatment of, 233

Patterning device for disabled persons, zero-rated, VI-II-19; Memo 4-2 para. 29

Pawnbrokers, Policy P-129

- sale of pledged item, 183(2), (7)
- seizure of pledged item, 183(1)

Pay telephone, calculation of tax, 165.1(1)

Pay television, see Telecommunication service

Payment

- arrangement, see Budget payment arrangement (equal billing plan)
- · of invoice amount
- • early or late, no effect on amount of tax, 161, 182(3); Memo 3-9
- of tax
- • by recipient, 165, 168, 224
- • Division IV, 219
- Division IV.1, 220.09; TIB B-XX5
- • remittance by supplier, 221(1), 228(2)
- progress, on construction contract
- timing of liability, 168(2); Memo 300-6-13; Memo 19-1 paras. 72–80, 92–97
- to CRA over \$10,000 after 2023, must be electronic, 278(3)

Payment bond, see also Construction: bond

• meaning of, Memo 17-1 para. 21

Payment card network operator

• fees to banks taxable, 123(1)"financial service"(r.6)

Peacocks, taxable, Memo 4-4 para. 7

Pearl, articles made of

• excise tax on, I-5(b); Memo 800-1

Peat

- bog or deposit, right to explore or exploit deemed not a supply, 162(1); Policy P-110R
- right to take, supplied to consumer, taxable, 146(c), 162(2), V-VI-20(k)
- taxable, Memo 4-4 para. 31

Pen

· insulin, see Insulin: pen

Penalties, Memo 16-2, see also Offences

- assessment of, 296(1)(c)
- cancellation of, 281.1(2); Memo 16-3
- • balance owing not over \$2, 297.10
- interest and penalty not over \$25, 280.20, 280.2; Memo 16-2 paras. 28, 40(b)
- · civil, 283, 284; Memo 16-2
- constitutes debt to Her Majesty, 313(1)"tax debt", 313(1.1)
- criminal, see offences (below)
- electronic sales suppression software, 285.01, see also Zapper software (or hardware)
- failure to answer demand for return, 283; TIB B-100
- failure to file complete financial institution information return, 284 1
- failure to file return electronically, 280.11
- failure to make payment over \$10,000 electronically (from 2024), 280.12
- failure to provide information, \$100, 284
- failure to provide investor information to investment plan for HST apportionment calculation, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 50(5); Notice 259
- false statement or omission, \$250 or 25%, 285
- • by third party, 285.1
- late filed return, 280.1; TIB B-100; Memo 16-2 paras. 25-26
- late payment under contract, GST included, 182
- may be waived where under \$25, 280.2; TIB B-100; Memo 16-2 paras. 28, 40(b)
- misrepresentation, 285
- • by third party, 285.1
- non-resident e-commerce, recipient providing false information, 285.02
- offences (criminal), 326-331; Memo 16-2 paras. 66-76
- • confidential information, 328
- • corporate officers, directors and agents liable, 330
- • failure to file return, 326(1)
- • failure to pay, collect or remit tax, 329(1)
- • false or deceptive written statements, 327
- • general, 329(2)
- • minimum punishment not to be reduced, 331
- paid in error, rebate of, 261
- post-judgment, continue to accrue, 313(3)
- railway corporation, failure to return rolling stock, non-taxable, 162.1(b), 182(3)(b); Policy P-217
- return filed late, 280.1; TIB B-100; Info Sheet GI-024; Memo 16-2 paras. 25–26
- sales suppression software, 285.01, see also Zapper software (or hardware)
- tax advisor, 285.1
- third party, 285.1

- under contract, GST included, 182
- under Customs Act, 214
- waiver of, 281.1(2); Memo 16-3
- • when demand for payment met on time, 280(7); Memo 16-2 para. 40(c)
- where legislation retroactive, 124(4)
- zapper software, 285.01, see also Zapper software (or hardware)

Penny, phasing out of, Info Sheet GI-131

Pension activity

• defined, for pension plan expenses, 172.1(1)

Pension contribution

• defined, for pension plan rebate, 261.01(1); TIB B-XX4

Pension entity

- defined, 123(1)
- election to have 225.4(5) not apply, 225.4(7)
- financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 35–36, 38

Pension plan, see also Registered pension plan

- defined, 123(1)
- financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 35–36, 38

Pension rebate amount

• defined, for pension plan rebate, 261.01(1); TIB B-XX4

Percentage, see also Rate

- financial institution's, for HST allocation rules, *see* Financial institution's percentage
- of completion of a building, Policy P-087
- of completion of residential complex, how to measure, Info Sheet GI-105
- of government funding, defined, 259(1); Public Service Body Rebate (GST/HST) Regulations s. 3; TIB B-025
- of non-residents expected to attend convention, Policy P-095
- of total floor space, defined (for new residential housing rebate), 256.2(1); New Harmonized Value-added Tax System Regulations, No. 2, s. 47(1)
- of use in commercial activity, see Use: in commercial activities
- rebate for public service body, specified, 259(1)"specified percentage", "specified provincial percentage"
- total value added (for export distribution centres), 273.1(3), (5)
- value added attributable to non-basic services (for export distribution centres), 273.1(2), (4)

Percussor, mechanical, for postural drainage treatment, zerorated, VI-II-6; Memo 4-2 para. 11

Performance

- amateur, spectator fees exempt, V-VI-11
- bond, see also Construction: bond
- • meaning of, Memo 17-1 para. 18; Policy P-210R
- musical or artistic, see Place of amusement
- of services, see also Service
- • in Canada, 142(1)(g)
- outside Canada, 142(2)(g)

Performing artist

- · non-resident
- • not eligible for small supplier status, 148(3)
- requirement to file return and remit tax, 238(3); Policy P-134R
- • requirement to register, 240(2)
- • supply not deemed made outside Canada, 143(1)(c)
- services of, supplied by charity, not exempt, V-V.1-1(h), V-VI-2(i)
- supply of intangible property on behalf of, 177(2); Artists' Representatives (GST/HST) Regulations; TIB B-009

Perfume, see Cosmetic

Periodical, see Magazine

Permanent establishment

- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 1(1), 3, 4
- • for provincial residence and place of supply rules, 132.1(2), (3); Memo 3-4 paras. 63–64
- • charities, NPOs and selected public service bodies, New Harmonized Value-added Tax System Regulations, No. 2,
- generally, 123(1); Policy P-208R; Memo 3-4 paras. 40–55; TIB B-090
- electronic commerce of, TIB B-090
- fixed place of business, Policy P-208R
- in a province, person deemed resident in province, 132.1(1)(d)
- of charity or other public service body, New Harmonized Value-added Tax System Regulations, No. 2, s. 2
- of non-resident, in Canada, deemed resident, 132(2)
- of resident, outside Canada, deemed non-resident, 132(3)
- of same person, supplies between, 132(4), 220
- security required by registrant if none in Canada, 240(6); Memo 2-6; Policy P-201
- water dispensed to consumer at, zero-rated, VI-III-2
- where individual who negotiates agreement works, IX-I-1"place of negotiation"

Permit

- fishing or hunting (for consumer), taxable, 146(b), (c), V-VI-20(j)
- supplied by government, exempt, V-VI-20(c)

Permit imprint

- defined, IX-VIII-1; Memo 28-2 para. 87
- HST place of supply rule, Memo 28-2 para. 88

Permitted deduction

• defined, for importation of service from foreign branch, 217

Person, see also Individual

- defined, 123(1); Memo 2-1 paras. 12-16; Memo 2-4 para. 20
- organization providing insurance adjusting services, Policy P-056R2
- investigated by inquiry, rights of, 276(6)
- resident in a province, 132.1
- resident in Canada, 132(1); Policy P-086R

Person at risk

 defined, Financial Services and Financial Institutions (GST/HST) Regulations s. 4(1)

Personal care services, see also Homemaker service

• exempt, VI-IV-2

Personal effects

- no GST on importation, VII-1
- no HST on bringing into participating province, X-I-10

Personal information

- defined, re communication of information, 295(1), 328(3)
- permission to disclose, 295(4.1), 295(5)
- prohibition against disclosure, 295(4)

Personal property, *see also* Change in use of capital property; Intangible property; Property; Tangible personal property

- capital, see Capital property
- charge on, after judgment for tax owing, 316
- · combined with other kinds of supply, see Combined supply
- deemed, for change in use rules, 195
- defined, 123(1), 195
- intangible, see Intangible property
- lease by school authority to student, exempt, V-III-15; Memo 20-1
- seizure by creditor, subsequent use, 183(5)–(6)
- supply by agent, 177(1), 177(1.1) [repealed]
- supply by non-resident, when deemed made outside Canada, 143(1)
- supply of, whether taxable, 141.1
- tangible, see Tangible personal property
- transfer between permanent establishments, 132(4), 220
- transferred to insurer in settlement of claim, 184(1), 184(4)–(5)
- transitional rules, 337

Personal representative of deceased individual

- authorized to sign documents, 279(b)
- certificate required before distribution, 270
- defined, 123(1)
- fees of, transitional rules
- • GST, 341.1(2); Policy P-041 (obsolete)
- • HST, 357(2); TIB B-077
- transfer of business assets to beneficiary, 167(2); Memo 14-4 paras. 29–32; Policy P-031
- transfer of property of deceased to, 267

Personal service

• whether HST applies, New Harmonized Value-added Tax System Regulations s. 17

Personal service (of documents), 333

• proof of, 335(2)

Personal trust

- defined, 123(1)
- expectation of profit test, 123(1)"commercial activity"(a), (b)

Personal use and enjoyment of property

- by employee, 170(1)(b); Memo 8-2 paras. 13-19
- by individual registrant, 172(1)
- by partner, shareholder or beneficiary, 170(1)(c); Memo 8-2 para. 20
- by purchaser of farmland, exemption, V-I-10, V-I-11, V-I-12
- · real property
- by builder, exception to self-supply rules, 191(5); Memo 19-2-3 paras. 47–48
- • by individual, no input tax credit, 208(1)

Personal use and enjoyment of property (cont'd)

• • conversion of, 190(2); Memo 19-2-3 paras. 85–86

Pesticide

- agricultural, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(4); Info Sheet GI-048
- applicator, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(g)(viii.1)

Pet food, not zero-rated, VI-IV-3

Petroleum

- constitutes mineral, 123(1)"mineral"
- fuel, excluded from non-resident business rebate for goods exported, 252(1)(c)
- products, excise tax on, Memo 800-4

Phantomware, see Zapper software (or hardware)

Pharmacist

- · defined, VI-I-1
- diagnostic or other service ordered by, exempt, V-II-10(c)
- prescription filled by, VI-I-1"prescription", VI-I-3(b)
- · service rendered by
- • dispensing drug, zero-rated, VI-I-4
- • health care, exempt, V-II-7.3

Phasing out of the penny, Info Sheet GI-131

Pheasants

• zero-rated, Memo 4-4 para. 5

Phone, see Telephone

Photocopiers

• service contract, place of supply for HST, Policy P-219

Photocopying

• whether a supply of service or property, Policy P-236

Photofinishing service

- place of supply for HST
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 29

Photographs

- · for personal use
- • no GST on importation, VII-1
- • no HST on bringing into participating province, X-I-5
- · production of, place of supply for HST
- after April 2010, New Harmonized Value-added Tax System Regulations s. 29

Photorefractive keratotomy

· exempt as medical service, V-II-5; Policy P-207

Physically disabled individual, *see* Disabled person or disabled individual

Physician, see Medical: practice; Medical: practitioner; Specified professional

Physiotherapy services

- exemption for, V-II-7(c)
- institutional, V-II-1"institutional health care service"(e), V-II-2
- practitioner of, V-II-1"practitioner"
- can authorize various medical devices, VI-II-1"specified professional"

Piano lessons, exempt, V-III-9; Equivalent Courses (GST/HST) Regulations; Memo 20-6; TIB B-014

Picker

• fruit or vegetable, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(b)(vii); Finance news release 93-039

Pies, taxable where packaged less than six, VI-III-1(m); Memo 4-3 paras. 87, 89, 93, 137

• meat, zero-rated, Memo 4-3 para. 94

Pigeons, taxable, Memo 4-4 para. 7

Pigs, zero-rated, VI-IV-1; Memo 4-4 para. 5

Pilotage services

supplied to unregistered non-resident carrier, zero-rated, VI-V-2; Memo 4-5-3 paras. 27–31; Policy P-076

Pinball game, see Coin-operated device

Pinball machines

• calculation of tax, 165.1(2)

Pipeline, *see also* Continuous supply (electricity, gas, etc.); Continuous transmission commodity

- export by, evidence of, Memo 4-5-2 Appendix A.2.B
- natural gas used as fuel for, while exporting, zero-rated, VI-V-15(b); Memo 4-5-2 para. 48
- operation of, qualifies for joint venture election, *Joint Venture* (GST/HST) Regulations s. 3(1)(q)
- supply of natural gas for export by, zero-rated, VI-V-15; Memo 4-5-2 para. 48
- transportation of natural gas by, joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(d)

Place of amusement

- · admission to
- • defined, 123(1)"admission"
- • made by public sector body, V-VI-5, 8, 9
- • supplied by charity, V-V.1-1(e), V-V.1-1(g)(i), V-VI-6, V-VI-2(i), (m), V-VI-5, 8, 9
- • supply by non-resident
- • cannot be a small supplier, 148(3)
- • required to file return, 238(3); Policy P-134R
- • required to register, 240(2)
- • supply not deemed made outside Canada, 143(1)(c)
- transitional provision
- ••• GST, 341(4)
- ••• HST, 356(4), (5); TIB B-077
- defined, 123(1)

Place of business

- constitutes permanent establishment, 123(1)"permanent establishment"(a)
- · fixed, Policy P-208R
- service of documents at, 333

Place of filing and payment of tax, 278; Memo 7-5 paras. 1, 2

Place of management, constitutes permanent establishment, 123(1)"permanent establishment"(a)(i)

Place of residence, see also Residential complex; Residential

- meaning of, Memo 19-2 paras. 15-18; Policy P-130
- primary, see Primary place of residence

Place of residence (cont'd)

usual, see Usual place of residence (for non-resident e-commerce)

Place of supply, 142–144; Memo 3-3, 3-3-2, *see also* Participating province

- electronic commerce, TIB B-090
- · goods
- • lease, see lease (below)
- • sale, 142(1)(a), 142(2)(a)
- intangible personal property, 142(1)(c); Memo 19-1 para. 38; Policy P-200R; TIB B-090
- lease, 142(1)(b), 142(2)(b)
- • not affected by subsequent lease intervals, 136.1(1)(d)
- lease of property, Policy P-193R
- province, for HST after April 2010, TIB B-103; New Harmonized Value-added Tax System Regulations ss. 2–33.2
- automobile, registered in a province, New Harmonized Value-added Tax System Regulations s. 33.1; Info Sheet GI-110
- intangible personal property, New Harmonized Value-added Tax System Regulations ss. 6–11; Memo 3-3-5, 3-3-5-1
- • in-flight or on-board charges, New Harmonized Value-added Tax System Regulations s. 23
- • membership, New Harmonized Value-added Tax System Regulations ss. 6–11
- motor vehicle, registered in a province, New Harmonized Value-added Tax System Regulations s. 33.1; Info Sheet GI-110
- • postage, IX-VII
- • real property, IX-IV-1; Memo 3-3-4
- • services generally, New Harmonized Value-added Tax System Regulations ss. 13–18; Memo 3-3-6, 3-3-6-1
- • airport screening, registered in a province, New Harmonized Value-added Tax System Regulations s. 33.2
- • baggage transportation services, IX-VI-4(a)
- • cleaning services, New Harmonized Value-added Tax System Regulations s. 29
- • customs brokerage services, New Harmonized Valueadded Tax System Regulations s. 25
- • freight transportation service, IX-VI-5
- • Internet access, New Harmonized Value-added Tax System Regulations s. 32
- • location-specific event services, New Harmonized Valueadded Tax System Regulations s. 28
- • maintenance services, New Harmonized Value-added Tax System Regulations s. 29
- • passenger transportation, New Harmonized Value-added Tax System Regulations s. 21; Memo 3-3-5-1
- • • transportation pass, New Harmonized Value-added Tax System Regulations s. 22; Memo 3-3-5-1
- • personal services, New Harmonized Value-added Tax System Regulations s. 17
- • photofinishing services, New Harmonized Value-added Tax System Regulations s. 29
- RRSP, RRIF, RESP, RDSP or TFSA trustee services, *New Harmonized Value-added Tax System Regulations* s. 30
- • repair services, New Harmonized Value-added Tax System Regulations s. 29
- • shipping, IX-VI-5

- ••• technical support provided by computer, New Harmonized Value-added Tax System Regulations s. 32
- • telecommunication services, IX-VIII
- ••• telephone, 1-900 and 1-976, New Harmonized Valueadded Tax System Regulations s. 31
- ••• travel agent ticket services, IX-VI-4.1
- • trustee services for registered account, New Harmonized Value-added Tax System Regulations s. 30
- • unaccompanied child supervision service, IX-VI-4(b)
- tangible personal property, IX-II; IX-VI-3; Memo 3-3-3

Place outside Canada

- defined, VI-VII-1(1); Memo 28-2 para. 17
- freight from, zero-rated, VI-VII-8, 9; Memo 28-2 paras. 68-71
- freight to, zero-rated, VI-VII-6, 9; Memo 28-2 paras. 63-67

Plan merger, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations (SLFIR) s. 66

- attribution point determined, SLFIR ss. 58(1)(a)(ii), 58(1)(b)(ii)
- defined, SLFIR ss. 16(1), 47(1)(a)
- forming exchange-traded series, SLFIR s. 33(3)
- forming non-stratified exchange-traded fund, SLFIR s. 34(3)
- forming non-stratified investment plan, SLFIR s. 32(4)
- forming stratified investment plan, SLFIR s. 30(4)
- prescribed circumstance for fiscal year determination, SLFIR s.
- reconciliation day, SLFIR ss. 59(a)(ii)(B), 62(a)(ii)(B)
- rules, SLFIR s. 66

Plan member

- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1)
- • for investment plan HST rules re non-residents, 225.4(2); Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 1(1), 6(2)(a)

Planning activity

- · defined
- • for tax-debt avoidance penalty, 285.01(1), 285.1(1)
- • for third-party penalty, 285.1(1)

Planning commission, see Para-municipal organization

Plant nutrients

• meaning of, Memo 4-4 para. 21

Planters and seeders, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(d); Memo 4-4 Schedule

Planting vegetation, exempt, V-VI-21.1(c)

Plants

 supplies by auction, election, 177(1.3); Property Supplied by Auction (GST/HST) Regulations s. 1(a)

Plaque

• imported for award in Canada, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(k)

Plasma expander

• zero-rated, VI-I-2(g)

Plastic surgery, see Cosmetic: purposes

Platinum, see Precious metal

Platters of cheese, cold cuts, fruit or vegetables

• taxable, VI-III-1(0.3); Memo 4-3 paras. 114-118

Playing games (of chance), see Bets

Pledge, not a supply, 134

· to pawnbroker, Policy P-129

Plywood

• processing facility, joint venture election, *Joint Venture* (GST/HST) Regulations s. 3(1)(p)

Podiatric services

- exemption for, V-II-7(e)
- practitioner of, V-II-1"practitioner"

Point of sale rebates

- British Columbia, 234(3)
- HST provincial portion, 234(3); Deduction for Provincial Rebate (GST/HST) Regulations
- • books (all HST provinces), Memo 13-4; Info Sheet GI-065
- children's clothing, shoes, car seats (Ont., BC, NS), Info Sheet GI-063
- • feminine hygiene products (Ont., BC, NS), Info Sheet GI-
- • motor fuel (BC), Info Sheet GI-061
- • newspapers (Ontario), Info Sheet GI-060
- • prepared food up to \$4 (Ontario), Info Sheet GI-064
- · new housing rebate
- • new home, 234(1), 254(4)
- • new home on leased land, 234(1), 254.1(4)
- non-resident, to
- • accommodation in tour package before 2018, 234(2), 252,1(8)
- • artistic works produced for export, 234(2), 252(3)
- • foreign convention, 234(2), 252.4(2), (4); Info Sheet GI-031
- • installation services, 234(1), 252.41(2)
- Ontario, 234(3)
- vehicle adapted for use by disabled person, 258.1(3); Info Sheet GI-199

Poker

· machine, see Gaming machine

Police

- commission, may apply to be municipality, 123(1)"municipality"(b); TIB B-046
- communication of information to permitted, 295(5)(1)
- · department, see Para-municipal organization
- moneys seized from tax debtor by, 320
- Royal Canadian Mounted Police, laying of information, 332(1)
- services supplied to government or municipality, exempt, V-VI-20(g)

Policy, see Insurance

Policy papers (CRA), see under "Current" tab (Binder C1)

Political donation, see Donation: to political party or candidate

Political party, see Registered party

Pooled fund trust

• constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(xi)

Pooled registered pension plan

- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(i.1)
- defined, 123(1), 149(5)(a)
- employee contribution to, 261.01(1)"employee PRPP contribution"
- participating employer of, 123(1)"participating employer"(b)
- rebate to, 261.01(1)"pension rebate amount" A(b)-(d)

Poor, see Underprivileged individuals

Pop, see Soda

Pop bottles, see Containers: returnable

Popcorn

- coated with candy, etc., taxable, VI-III-1(e); Memo 4-3 paras. 45–54
- popped, taxable, VI-III-1(f); Memo 4-3 para. 55
- unpopped kernels, zero-rated, Memo 4-3 para. 59

Poppies and wreaths (for Remembrance Day)

- purchase of, by Royal Canadian Legion branches, rebate, 259.2
- sale of, by Royal Canadian Legion branches etc., exempt, V-VI-27

Popsicles, taxable, VI-III-1(j); Memo 4-3 paras. 71–73

Portable wheelchair ramp, zero-rated, VI-II-17; Memo 4-2 para. 25

Possession

- · leased property, transfer of
- • given in Canada, constitutes supply in Canada, 142(1)(b)
- given outside Canada, constitutes supply outside Canada, 142(2)(b)
- · personal property, transfer of
- • triggers liability for tax, 168(3)
- • under agreement of sale, constitutes sale, 123(1)"sale"
- · real property, transfer of
- • after 1990, new housing rebate, 121(2)
- meaning of, Policy P-111R
- • self-supply rules, 191(1)–(4)
- • transitional rules, 336
- • triggers liability for tax, 168(5)

Postage, see Mail

Postage stamp

· defined, IX-VII-1; Memo 28-2 para. 81

Postal note or remittance, 123(1)"money"

Postal service, see Mail

Post-dated cheque

• when payment made, Memo 300-6-2 para. 9

Posting security, see Security

Postmark, see Mail

Post-secondary institution, see Public college; University

Post-secondary technical institute

• rebate for printed books, 259.1; TIB B-076

Postural drainage treatment, mechanical percussor for, zerorated, VI-II-6; Memo 4-2 para. 11

Potato chips and potato sticks, taxable, VI-III-1(f); Memo 4-3

Poultry

- eggs, zero-rated, VI-IV-4; Memo 4-4 para. 17
- · feed for, zero-rated, VI-IV-2
- feeding system and components, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(g)(vi.1), (vi.2)
- zero-rated, VI-IV-1; Memo 4-4 para. 5

Power of sale

• sale under, deemed to be seizure, 183(10); Policy P-226

Powers

- of hearing officer on inquiry, 276(3)
- of judge on application for review of order, 289(6)
- of Minister, delegation, 275(3)

Practitioner, see also Medical: practitioner

- defined
- • for health care services (non-medical), V-II-1
- • for medical devices (physician), VI-II-1 [repealed]
- for prescription drugs (physician or dentist), VI-I-1 [repealed]
- drug prescribed by, zero-rated, VI-I-3
- qualifications where no licensing required, V-II-1"practitioner"(b)
- services of, exempt, V-II-7, see also Health care services, exempt

Pre-collection of GST

• effect where debt goes bad, Policy P-082R

Precious metal, Memo 17-1 paras. 27-36

- constitutes financial instrument [so supply of is exempt], 123(1)"financial instrument"(e)
- custodial or nominee services in respect of, see Custodial service
- defined, 123(1); Policy P-192 (obsolete)
- export of, zero-rated, VI-IX-1
- import of, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(a)
- sale by jeweller, whether taxable, VI-IX-1; Policy P-192 (obsolete)
- · sale by refiner
- included in denominator for determining *de minimis* financial institution, 149(4.01); Memo 17-7 paras. 24–26
- • zero-rated, VI-IX-3
- unwrought gold, silver or platinum, import of for refining, no tax, VII-8; *Non-Taxable Imported Goods (GST/HST) Regulations* s. 3(b)

Predecessor

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 7(4)(b)

Prenylamine (drug), zero-rated, VI-I-2(e)(iii)

Prepaid

- expenses, 123(1)"exempt supply", "zero-rated supply" (Analysis)
- · funeral arrangements, transitional rules
- • GST, 344; Policy P-071R (obsolete)
- • HST, 360; TIB B-077; Policy P-071R (obsolete)
- · rent or royalties, transitional rules
- • GST, 340(1), (2), (3), (6)

- • HST, 354(1), (2); TIB B-077
- · supplies, transitional rules
- • GST, 336(6)–(8), 340(2), 340.1
- • HST, 352(9), (10), 354(2), 355; TIB B-077

Prepared food

- taxable, VI-III-1(o)-(o.4); Memo 4-3 paras. 101-120
- arrangements, VI-III-1(o.3); Memo 4-3 paras. 114–118; Policy P-232
- • heated foods, VI-III-1(o); Memo 4-3 paras. 101–103
- • platters, VI-III-1(0.3); Memo 4-3 paras. 114–118
- • salads, VI-III-1(0.1); Memo 4-3 paras. 104–109
- • sandwiches, VI-III-1(o.2); Memo 4-3 paras. 110–113

Prerequisite courses, exempt, V-III-10

Prescribed, see also Regulations

- activity, for joint venture election, 273(1); *Joint Venture* (GST/HST) Regulations; TIB B-021
- agents of Her Majesty, 122(c) [repealed], 123(1)"specified Crown agent"; Specified Crown Agents (GST/HST) Regulations; TIB B-012
- amount
- for FST new housing rebate, 121(1)"estimated federal sales tax"; Federal Sales Tax New Housing Rebate Regulations s.
 TIB B-016
- circumstances for ignoring importation in determining last acquisition or importation, 195.2(1)(c)
- · circumstances of importing goods
- • not taxed on importation, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations; TIB B-023
- valuation rules, 215(2); Value of Imported Goods (GST/HST) Regulations; TIB B-031
- class of persons, to whom information may be communicated by Revenue Canada, 295(5)(c)(i)
- class of registrants to make election for streamlined accounting, 227(1); Streamlined Accounting (GST/HST) Regulations; TIB B-028
- conditions, permitting communication of information by CRA to another government, 295(5)(b)
- corporation, to be closely related to a corporation, 128(1)(b); *Closely Related Corporations (GST/HST) Regulations* s. 3; Memo 14-7
- defined, 123(1)
- diagnostic, treatment or other health care service, on order of practitioner, exempt, V-II-10; Health Care Services (GST/HST) Regulations; TIB B-019
- drugs (prescribed by physician or dentist), zero-rated, VI-I; Memo 4-1
- equivalent of tutoring or instruction course, exempt, V-III-9;
 Equivalent Courses (GST/HST) Regulations; Memo 20-6; TIB B-014
- forms, 123(1)"prescribed"(a)
- floor space for FST new housing rebate, 121(1)"estimated federal sales tax"; Federal Sales Tax New Housing Rebate Regulations s. 4; TIB B-016, B-049
- food and beverages, supplied in school cafeteria, not exempt, V-III-12; School Cafeteria Food and Beverage (GST/HST) Regulations; Memo 20-5; TIB B-026
- game of chance, excluded from exemption for supplies by charities and non-profit organizations, V-VI-5.1; Games of Chance (GST/HST) Regulations s. 4; TIB B-018
- · goods

Prescribed (cont'd)

- • not taxed on importation, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations; TIB B-023
- • under \$20, sent by mail or courier, taxed on importation, VII-7; Mail and Courier Imports (GST/HST) Regulations; Courier Imports Remission Order s. 4; Postal Imports Remission Order s. 4
- government organization, for public service body rebate, 259(1)"non-profit organization"
- group, for deduction from net tax on purchase of accounts receivable that become bad debts, 231(2)
- health care service, exempt, V-II-10; Health Care Services (GST/HST) Regulations; TIB B-019
- information, see also Information: prescribed
- for claiming input tax credits, 169(4); Input Tax Credit Information (GST/HST) Regulations; Memo 8-4 paras. 18–33
- • for credit note or debit note, 232(3)(a); Credit Note and Debit Note Information (GST/HST) Regulations
- • for forms, see forms
- • regarding transactions with related non-residents, 294
- input tax credit, to be claimed by registrant electing for streamlined accounting, 227(5); Streamlined Accounting (GST/HST) Regulations s. 22; TIB B-028
- instrument, to be financial instrument, 123(1)"financial instrument"(g)
- interest rate, see rate of interest
- lottery corporation, 188(5); Games of Chance (GST/HST) Regulations s. 3; TIB B-018
- manner
- for determining percentage of government funding of nonprofit organization, 259(1)"percentage of government funding"; Public Service Body Rebate (GST/HST) Regulations s. 3; TIB B-025
- for determining rebate for charity or qualifying non-profit organization electing for simplified computation, 259(12)
- for disclosing tax on supplies, 223(1); Disclosure of Tax (GST/HST) Regulations; TIB B-013
- • for filing forms, 123(1)"prescribed"(a)
- • for filing returns, 123(1)"prescribed"(a)
- for valuation of imported goods, 215(2); Value of Imported Goods (GST/HST) Regulations; TIB B-031
- · mark-up, see Streamlined accounting
- method
- • for determining FST inventory rebate, 120(5); Federal Sales Tax Inventory Rebate Regulations s. 4; TIB B-015
- for streamlined accounting, 227(1); Streamlined Accounting (GST/HST) Regulations; TIB B-028
- part of return, requirement to provide to a person, 277(1)(e)
- percentage
- automobile benefits, 173(1)(d)(vi)(A); Automobile Operating Cost Benefit (GST/HST) Regulations
- for instalment base in transitional year, 237(5) [repealed];
 Transitional Instalment Base Percentage (GST/HST)
 Regulations; TIB B-030
- of government funding of non-profit organization,
 259(1)"percentage of government funding"; Public Service Body Rebate (GST/HST) Regulations s. 3; TIB B-025
- of tax payable, for public service body rebates, see Specified percentage; Specified provincial percentage

- • of tax required to be paid, on export of used specified tangible personal property, *Specified Tangible Personal Property (GST/HST) Regulations* s. 3; TIB B-027
- period for which records must be retained, 286(3)
- · person, excluded from charities and non-profit organizations
- • supplying exempt right to play in game of chance, V-VI-5.1
- • taking bets which are exempt, V-VI-5.2
- personal property, to be specified tangible personal property, 123(1)"specified tangible personal property"(f)
- property
- • deemed to be personal property rather than real property,
- excluded from simplified computation for charity and qualifying non-profit organization rebate, 259(12)
- • ineligible for public service body rebate, 259(3); *Public Service Body Rebate (GST/HST) Regulations* s. 4; TIB B-025
- input tax credits available to charity or qualifying non-profit organization that has elected for simplified computation of rebate, 259(8)
- • zero-rated as medical device, VI-II-31; TIB B-022
- zero-rated for agriculture and fishing, VI-IV-10; Agriculture and Fishing (GST/HST) Regulations; Info Sheet GI-049
- purposes, for which corporations deemed a continuation of predecessor on amalgamation, 271(b); Amalgamations and Windings-Up Continuation (GST/HST) Regulations; TIB B-007
- purposes, for which parent corporation deemed a continuation of wound-up subsidiary, 272(a); Amalgamations and Windings-Up Continuation (GST/HST) Regulations; TIB B-007
- rate of interest, 120(7), 121(6), 229(3), 230(3), 280(1), (1.1),
 (2), (3), 296(3)(a), (3)(b), (6), 297(4); Interest Rates (Excise Tax Act) Regulations; TIB B-020
- • can be referred to as such in certificate or memorial, 316(11)
- • table of rates, 124
- recipient, of real property, excusing supplier from requirement to collect tax, 221(2)(c)
- registrant
- • excluded from general rules for capital personal property, 199(1)(a), 200(1)(a)
- • excluded from rules for capital real property, 206(1)(c)
- • lottery corporation, 188(5); Games of Chance (GST/HST) Regulations s. 3; TIB B-018
- making supplies of intangible property on behalf of artists, 177(2); Artists' Representatives (GST/HST) Regulations; TIB B-009
- to make election for streamlined accounting, 227(1);
 Streamlined Accounting (GST/HST) Regulations; TIB B-028
- service
- • excluded from rule re sponsorship of public service activities, 135
- • excluded from simplified computation for charity and qualifying non-profit organization rebate, 259(12)
- health care, on order of practitioner, exempt, V-II-10;
 Health Care Services (GST/HST) Regulations; TIB B-019
- ineligible for public service body rebate, 259(3); Public Service Body Rebate (GST/HST) Regulations s. 4; TIB B-025
- input tax credits available to charity or qualifying non-profit organization that has elected for simplified computation of rebate, 259(8)

Prescribed (cont'd)

- • not to be financial service, 123(1)"financial service"(t); Financial Services and Financial Institutions (GST/HST) Regulations s. 4; TIB B-017
- to be financial service, 123(1)"financial service"(m); Financial Services and Financial Institutions (GST/HST) Regulations s. 3; TIB B-017
- • to be made in Canada, 142(1)(f)
- • to be made outside Canada, 142(2)(f)
- • zero-rated as medical device, VI-II-31; Memo 4-2
- supplier, of real property, required to collect tax, 221(2)
- supply, not to be taxed under Division IV, 217"imported taxable supply"(a), (b), (b.1), (c)
- tax, excluded from base for calculating GST, 154, 173(1);
 Taxes, Duties and Fees (GST/HST) Regulations; TIB B-029
- tax factors for FST inventory rebate, 120(5); Federal Sales Tax Inventory Rebate Regulations s. 3; TIB B-015
- value, for HST on specified motor vehicle, 220.05(1)B(a), 220.06(1)B(a)

Prescribed financial institution

 defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 9–15

Prescription, defined, VI-I-1

Prescription drugs

- defined, Streamlined Accounting (GST/HST) Regulations s. 2(1)
- zero-rated, VI-I; Memo 4-1

Prescription eyewear, part for

• whether zero-rated, VI-II-32

Presentation, see also Admission; Place of amusement

- direct cost of, defined, V-VI-1"direct cost" [repealed]
- supply of admission for no more than direct cost, exempt, V-VI-8 [repealed]

President, see also Officer

- authorized to sign documents, 279(a)
- liable to pay or remit tax for unincorporated body, 324

Press release, regulation retroactive to, 277(2)(d)

Pretzels, brittle, taxable, VI-III-1(f); Memo 4-3 para. 55

Price

· whether tax included in, see Tax-extra or tax-inclusive pricing

Price of goods or services, see Consideration; Coupon

Pricing, see Tax-extra or tax-inclusive pricing

Primarily

• meaning of, 199(2) (Analysis)

Primary place of residence

- meaning of, Memo 19-3 paras. 11-12; Policy P-228
- • for duplexes, Memo 19-3-7 paras. 2-3

Primary use of property, *see* Change in use of capital property; Use: in commercial activities

Primary use rule, election for exempt supplies before October 1992, Policy P-072 (obsolete)

Prince Edward Island

- builder in, Info Sheets GI-146, GI-153, GI-164
- • temporary recapture of input tax credits, Info Sheet GI-165
- · causeway to, see Northumberland Strait Crossing

- charity rebate, transition for 2023, New Harmonized Valueadded Tax System Regulations s. 58.63
- First Nations, supplies to, Info Sheet GI-159
- HST implementation, see Transitional rules (HST, 2013) in PEI
- HST rate, New Harmonized Value-added Tax System Regulations s. 33.3(3)
- harmonization date (April 1, 2013), New Harmonized Valueadded Tax System Regulations s. 33.3(1)
- harmonization with GST, see the "Provincial Taxation" tab in Binder P2 of the Canada GST Service
- · landlord's rebate, Info Sheet GI-149
- large business temporary recapture of ITCs, New Harmonized Value-added Tax System Regulations, No. 2, s. 26"specified province"
- new housing in, Info Sheets GI-144, GI-146, GI-152, GI-153
- prescribed as HST province, New Harmonized Value-added Tax System Regulations s. 33.3(2)
- provincial government entities pay HST, Memo 18-2 para. 23; Info Sheet GI-154
- · public service bodies, Q&A, Notice 282
- recapture rate for large business temporary recapture of ITCs, New Harmonized Value-added Tax System Regulations, No. 2, s. 26"recapture rate"(c)
- Transitional Tax Adjustment, *New Harmonized Value-added Tax System Regulations*, *No.* 2, ss. 58.04(1)(e), 58.05(1)(e), 58.06(1)(e); Info Sheets GI-144, GI-150

Principal

• supply by agent for, 177(1), (1.1) [repealed]

Principal business

- lending money or purchasing debt, 149(1)(a)(viii); Memo 17-6 para. 21
- meaning of, Memo 17-6 paras. 8-12
- of amalgamated corporation where predecessor was financial institution, 149(2)(b)
- of person that acquires financial institution, 149(3)(b)
- providing insurance, 149(1)(a)(v)
- trader, dealer or broker, 149(1)(a)(iii); Memo 17-6 para. 7

Print or etching, see Specified tangible personal property

Print-out of electronically filed return

• acceptable as evidence, 335(12.1); Memo 7-5 para. 11

Printed book

- defined, 259.1(1); Memo 13-4
- • for 2024–25 temporary GST holiday, VI-XI-1
- •• meaning of "brochure or pamphlet", Policy P-234 (obsolete); Memo 13-4
- meaning of "warranty booklet" and "owner's manual", Policy P-227 (obsolete); Memo 13-4
- point of sale rebate, *Deduction for Provincial Rebate* (GST/HST) Regulations:
- • New Brunswick, Sch. 3, s. 1
- • Newfoundland and Labrador, Sch. 5, s. 1
- • Nova Scotia, Sch. 2, s. 1
- • Ontario, Sch. 1, s. 1
- • Prince Edward Island, Sch. 4.1, s. 1
- rebate of provincial tax, reduces HST, 214.1, 220.09(3), 231.1, 234(3); *Deduction for Provincial Rebate (GST/HST) Regulations*; Memo 13-4

Printed book (cont'd)

- rebate for GST on, to public service bodies, 259.1(2); Memo 13-4
- zero-rated, 2024-25 temporary GST holiday, VI-XI-4

Printed matter promoting tourism

- · no GST on importation, VII-3
- no HST on bringing into participating province, X-I-12

Prior recipient

• resupply of used home by, V-I-2(b)(i)

Prior supply

• of used home, election for return to be taxable, V-I-2(b)(i)

Priority Courier Services

• defined, Fees in Respect of Mail Regulations s. 2

Private copying levy

 no tax on certain supplies by collecting body or collective society, 177.1

Private investment plan, see also Investment plan

- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1)
- for investment plan HST rules re non-residents, 225.4(2);
 Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 1(1), 6(2)(a)
- election to have 225.4(5) not apply, 225.4(7)

Private party, school cafeteria meals not exempt, V-III-12; Memo 20-5

Private school tuition, exempt, V-III-2; Memo 20-1, *see also* School

Private-duty nursing service, exempt, V-II-6

Privilege claim, see Solicitor-client privilege

Prize in kind

• defined, Games of Chance (GST/HST) Regulations s. 5(1)

Prizes, see also Bets; Game of chance

- animal owned for, joint venture election, Joint Venture (GST/HST) Regulations s. 3(1)(j)
- · awarded outside Canada or participating provinces
- • no GST on importation, VII-2
- • no HST on bringing into participating province, X-I-11
- contribution to prize fund, no tax, 188(3), (4)
- deemed not a supply, 188(2)
- delivered or paid to lottery ticket distributor by lottery corporation, ignored, 188.1(4)(a)(ii)
- effect on exemption for amateur competitions, V-VI-11
- given to lottery ticket distributor by lottery corporation, ignored, 188.1(5)(a)
- paid, excluded from calculation for small supplier status, 148
- treatment of, 188

Proceeds of disposition under Income Tax Act

- contribution to trust deemed made at, 268
- distribution by trust deemed made at, 269

Process

 defined, Value of Imported Goods (GST/HST) Regulations s. 2(1)

Processing

- defined
- • for export distribution centres, 273.1(1)
- for non-taxable importations of goods for processing, VII-8.2.
- of exported property, effect on zero-rating, VI-V-1(c); Memo 4-5-2 paras. 7-11
- of financial instrument, constitutes financial service, 123(1)"financial service"(d)
- of fish, effect on zero-rating, VI-IV-8; Memo 4-4 para. 34; Info Sheet GI-049
- of goods for non-resident, see Inward processing
- of tobacco leaves, effect on zero-rating, VI-IV-7; Memo 4-4 para. 33
- of wool, effect on zero-rating, VI-IV-6; Memo 4-4 para. 32

Processing service

- exporters of, 213.1, 213.2; TIB B-069
- non-taxable importation of goods for, VII-8.1

Procurative extent (for ITC allocation of financial institution)

• defined, 141.02(1)

Procurement cards, Policy P-X10 (Notice 199)

Procuring orders for supply by or to non-resident

• service zero-rated, VI-V-5; Memo 4-5-3 paras. 37-38

Producer, repeal of FST, transitional rules, 118

Product design

• excluded from exempt financial services, 123(1)"financial service"(r.4)(ii)

Production

- defined, for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 26
- equipment, see Production equipment
- from natural resources, amount computed by reference to, not taxed, 162(1); Policy P-110R
- goods for export, rebate, 252(2)–(3)

Production equipment

- defined, for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 26
- supplies by auction, election, 177(1.3); Property Supplied by Auction (GST/HST) Regulations s. 1(d)

Professionals and professional services, see also Service

- accountant, actuary, lawyer or notary, excluded from financial service, 123(1)"financial service"(r)
- advertising, exported, VI-V-8; Memo 4-5-3 paras. 48–50, 87–90
- athlete or artist, see Performing artist; Place of amusement
- constitute business, 123(1)"business"
- courses, exempt, V-III-6; Memo 20-4
- deductible fees incurred by employee, rebate for, 253; Memo 500-4-6
- dues to maintain status, exempt, V-VI-18; Memo 400-3-7
- exported, 142(2)(g), VI-V-9, VI-V-23; Memo 4-5-3 paras.
 87–90; Policy P-169R
- eye-care, written order of, eyeglasses exempt, VI-II-9; Memo 4-2 para. 15
- · health care, see Health care services, exempt; Practitioner
- imported, 217, 218

Professionals and professional services (cont'd)

- · lawyer, see Lawyer: services of
- meaning of, Memo 4-5-3 paras. 11-12
- · medical, see Health care services, exempt; Medical
- non-resident
- • provided by, see imported (above)
- • provided to, see exported (above)
- solicitor-client privilege, 293
- zero-rated, VI-V-9, VI-V-23; Memo 4-5-3 paras. 87–90

Profit, reasonable expectation of, 123(1)"commercial activity"; Policy P-176R

Profit sharing plan, 149(5)(a)(ii), (v)

Program of instruction, see Educational services: courses

Progress payment on construction contract

 general rule, 168(2), (6); Memo 300-6-13; Memo 19-1 paras. 72-80, 92-97

Prohibiting introduction in court of foreign-based document, 292(8)

Promissory note

- bringing into HST province, no HST self-assessment, X-I-17
- constitutes money, 123(1)"money"
- importation of, no GST, VII-10

Promotion of tourism, printed matter not taxed on importation, VII-3

Promotional allowance

• treated as adjustment to consideration, 232.1; Policy P-243

Promotional bonuses and prizes

 given to lottery ticket distributor by lottery corporation, ignored, 188.1(5)(a)

Promotional supply

• defined, Games of Chance (GST/HST) Regulations s. 5(1), (2.1)

Promotional items (direct seller rules), see Sales aid

Prompt payment discount, see Early/late payment

Prone boards

• zero-rated as medical devices, VI-II-40; Memo 4-2 para. 59

Proof of residency and registration status, Memo 3-4 Appendix A; Memo 4-5-1 Appendix A, B; Policy P-009

Proof of service, documents, etc., 335

Property, *see also* Capital property; Personal property; Real property; Supply

- appropriation of, 172
- charge on, after judgment for tax owing, 316
- defined, 123(1), 325(0.1); TIB B-090; Memo 27-3 para. 12
- insurance claim, Memo 17-16
- intangible, see Intangible property
- lease of, see Lease (or license)
- provision of, constitutes supply, 123(1)"supply"
- seizure or repossession of, 183
- situated in Canada, meaning of, Policy P-169R
- supply of, in electronic commerce, TIB B-090
- taxes, exempt, V-VI-21
- · transferred to insurer on settlement of claim, 184

Proposed changes to GST legislation, TIB B-075

Prosecution, see Offences

Prospectus filing fees, exempt, V-VI-20(b.1) [History]

Prosthesis, medical or surgical

- exempt when supplied in health care facility, V-II-1"institutional health care service"(b)
- zero-rated, VI-II-25, 26; Memo 4-2 paras. 43, 44

Protein isolate and phosphate compound

not zero-rated, Policy P-240; Info Sheet GI-001

Provinces and provincial law, see also Government; Harmonized Sales Tax; Public sector body; Quebec, special

- · agent of, see Specified Crown agent
- application of GST to provinces, 122; TIB B-006; Memo 18-2
- communication of information by CRA to provincial officials, permitted, 295(5)(d)(iii)–(iv)
- construction holdbacks pursuant to, 168(7); Memo 300-6-14; Memo 19-1 paras. 81–84
- · Crown agent, see Specified Crown agent
- defined, Interpretation Act s. 35(1)
- · educational courses approved by, see Educational services
- garnishment of payments by, 317(12)
- harmonization with GST, see Harmonized Sales Tax
- health-insurance-covered services exempt, V-II-9
- · legal aid services exempt, V-V-1
- list of provincial government entities not subject to GST, 122 (Analysis)
- motor vehicle licensing authorities, collection of HST, Specified Motor Vehicle (GST/HST) Regulations s. 3
- obligation to collect tax, 122(b); TIB B-006; Memo 18-2
- · practitioners licensed by, see Practitioner
- prescribed provincial government organization, rebate to, 259(1)"non-profit organization"
- province defined, 123(1); Interpretation Act s. 35(1)
- provincial component of HST, 165(2)
- • rebate of, for books, 234(3)
- provincial governments paying GST/HST on purchases, Memo 18-2 paras. 23, 24; Info Sheets GI-073, GI-154, GI-155, GI-158
- provincial regulatory body, see Regulatory body
- reciprocal taxation agreements, text of, 123(1)"specified Crown agent" (Analysis)
- residence in a province, 132.1
- · sales taxes of, see also Provincial levy
- excluded from bad debt adjustment calculation, Policy P-066 (obsolete)
- • excluded from base for GST on bets, 187
- • excluded from employee benefit calculation, 173(1)
- • included in cost of capital property, Policy P-060
- • included in GST on construction contracts, TIB B-053
- • whether included in base for GST, 154; Taxes, Duties and Fees (GST/HST) Regulations; TIB B-029
- supplies to
- • whether GST or HST on, 122 (Analysis); Constitution Act, 1867 s. 125; Memo 18-2 paras. 23, 24
- • where disclosure not required, 223(1.3)
- tourist literature of, no HST self-assessment, X-I-12(a)
- vehicle licensing office, collection of HST, see Specified motor vehicle

Provincial authority

• defined, Specified Motor Vehicle (GST/HST) Regulations s. 1

Provincial factor

• defined, for pension plan expenses, 172.1(1)

Provincial gaming authority

• defined, Games of Chance (GST/HST) Regulations s. 5(1)

Provincial investment plan

• defined, New Harmonized Value-added Tax System Regulations, No. 2, s. 1

Provincial levy, see also Provinces: sales taxes of

- defined, 154(1)
- included in consideration for GST, 154(2)(b)

Provincial qualifying amount

defined, Public Service Body Rebate (GST/HST) Regulations s.

Provincial rate

 defined, for regulations on interprovincial movements, New Harmonized Value-added Tax System Regulations, No. 2, s. 6

Provincial sales tax

 defined, Input Tax Credit Information (GST/HST) Regulations s. 2

Provincial sales tax paid or payable

 defined, Input Tax Credit Information (GST/HST) Regulations s. 2

Provincial schedule

 defined, Deduction for Provincial Rebate (GST/HST) Regulations s. 1

Provincial series

- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1); New Harmonized Value-added Tax System Regulations, No. 2, s. 1
- stratified investment plan not an SLFI is each series is a provincial series, *Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations* s. 12

Provincial stratified investment plan

 defined, New Harmonized Value-added Tax System Regulations, No. 2, s. 1(1)

Provincial tax policy flexibility

• defined, 277.1(3)(a)

Provincially-established designated body

- · defined, V-VI-1
- supplies to/from municipal entities not exempt, V-VI-28(f)

Provincially taxable portion (of tour package)

- deemed separate supply, 163(2.1)
- defined, 163(3)

Prudent person, standard of care for directors, 323(3)

Pruning vegetation, exempt, V-VI-21.1(c)

Psychiatric nurse

• exemption for services, V-II-6

Psychoanalytic services, exempt, V-II-12 [repealed]

Psychological services

- Canadian Register of Health Service Providers in Psychology, V-II-1"practitioner"(c)
- exempt, V-II-7(j)
- practitioner of, V-II-1"practitioner"

Public college, *see also* Educational services; Public institution; Public sector body; Public service body

- athletic fees (mandatory), exempt, V-III-7.1; Memo 20-2
- constitutes public institution or not, 123(1)"public institution"
- constitutes public sector body, 123(1)"public sector body"
- constitutes public service body, 123(1)"public service body"
- courses, V-III; Memo 20-2
- • diploma or degree, exempt, V-III-7
- • non-degree, program of two or more courses, exempt, V-III-
- • not exempt under general exemption for charities, V-VI-2(l), (m)
- • professional or trade accreditation, exempt, V-III-6
- second language instruction, V-III-11
- • vocational, exempt, V-III-8
- defined, 123(1); Memo 20-2
- excluded from definition of *de minimis* financial institution, 149(4.1)(a)(i); Memo 17-7 para. 5
- exempt supplies, V-III; Memo 20-2, see also Educational services
- food service supplied to, exempt, V-III-14; Memo 20-5
- funding level required, Memo 20-2, Policy P-185R
- mandatory fees, exempt, V-III-7.1; Memo 20-2
- meal plans, exempt, V-III-13; Memo 20-5
- multiple capacities, apportionment of public service body rebate, 259(4.1), (7), (8)
- · real property supplied by, V-VI-25
- rebate for printed books, 259.1; Memo 13-4
- rebate of 67% of GST paid, 259(1)"specified percentage"(d), 259(3)(a); TIB B-025; Memo 500-4-3
- rebate of percentage of provincial portion of HST paid, 259(1)"specified provincial percentage", 259(3)(b); *Public Service Body Rebate (GST/HST) Regulations* s. 5(c)(iv)
- student council fees, exempt, V-III-7.1; Memo 20-2
- student residence, see Student residence
- tuition, exempt, V-III-7, V-III-7.1; Memo 20-2

Public exhibition

• goods imported for, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(c)

Public hospital, see Hospital: authority

Public institution, see also Hospital; Public college; School; University

- defined, 123(1)
- excluded from definition of charity, 123(1)"charity"
- excluded from definition of NPO, 123(1)"non-profit organization"
- exemptions for supply made by, V-VI-2
- small supplier threshold, 148.1(2); Memo 2-2 para. 8

Public library, see Library (public)

Public sector body, Memo 400-4, see also Government; Public service body [Note: some exemptions for supplies by public

Public sector body (cont'd)

sector bodies are worded in terms of supplies by public service bodies.]

- capital real property, 209-211, see also Capital property
- defined, 123(1)
- fund-raising activities by volunteers, whether exempt, V-VI-4
- input tax credits, Memo 400-4
- nursing service supplied to, exempt, V-II-6
- sale of real property by, 193(2), V-V.1-1, V-VI-25
- · selected public service body
- defined, 259(1)
- rebate for GST paid by, 259(3), (4); Public Service Body (GST/HST) Regulations; TIB B-025
- • provincial sales tax, HST provinces, 259(3)(b), 259(4)(b)
- • rules affecting rebate, 259(7), (8)
- supplies by, exempt, V-V.1, V-VI; Memo 300-4-6
- • day camp, V-VI-12
- • fund-raising activities by volunteers, V-VI-4
- • gambling, V-V.1-6, V-VI-5
- • library borrowing privileges, V-VI-19
- • memberships, V-VI-17
- • nil consideration, V-V.1-5, V-VI-10
- • nominal consideration, V-VI-6-9
- • real property, V-VI-25
- • recreational services, V-VI-12, 13

Public servants, association of, see Trade union

Public service body, Memo 400-4, see also Charity; Hospital: authority; School: authority; Public college; Public sector body; University [Note: some exemptions for supplies by public service bodies are worded in terms of supplies by public sector bodies.]

- branches, application to be separate, see Small supplier division
- capital real property of, 209-211, see also Capital property
- constitutes public sector body, 123(1)"public sector body"
- defined, 123(1)
- divisions, application to be separate, see Small supplier division
- Prince Edward Island, Q&A, Notice 282
- quick method of accounting, *Streamlined Accounting* (GST/HST) Regulations ss. 19–21; TIB B-028
- rebates, 259; Memo 500-4-2, 500-4-3, 500-4-4
- overlap between PSB rebate and new residential rental property rebate, 256.2(9.1)
- simplified calculation, Public Service Body Rebate (GST/HST) Regulations ss. 6–8
- · registered pension plan sponsored by, Policy P-197
- residence in a province, 132.1; Info Sheet GI-121
- small supplier threshold \$50,000, 148(1)(a), 148(2)(a)
- · sponsorship of activities, deemed not a supply, 135
- supplies by, exempt, V-VI

Public transit, see International publication; Passenger transportation service

Publication, see Book; Magazine; Newsletter; Newspaper

Publishing rights

• place of supply, 142(1)(c), 142(2)(c); Policy P-200R

Pudding, taxable in single servings, VI-III-1(n), (o)(v); Memo 4-3 paras. 27–34

• frozen, see Frozen pudding

Puffs (such as cheese puffs), taxable, VI-III-1(f); Memo 4-3 paras. 55–58

Pulp

• processing facility, joint venture election, *Joint Venture* (GST/HST) Regulations s. 3(1)(p)

Pump

• extremity or intermittent pressure, for use in treating lymphedema, zero-rated, VI-II-21.1; Memo 4-2 paras. 32, 33

Punishment, see also Offences; Penalties

• minimum, court has no power to decrease, 331

Purchase agreement

- assignment of, taxable, 192.1(a)
- defined, 192.1

Purchase agreements, new home

- assignment of, 192.1; Notice 323
- in Alberta, Memo 19-3-7 para. 1; Policy P-083

Purchase credit

• defined, 153(4.1)B

Purchase threshold

• defined, Streamlined Accounting (GST/HST) Regulations s. 21.1(3), (4)

Purchaser, see also Recipient

- defined
- • for direct seller rules, 178.1; Memo 1-5
- • for rule re takeover fees, 186(2)
- insolvent, assessment of by CRA, Policy P-112R

Purchasing agent, see Purchasing representative

Purchasing representative

- services to non-resident zero-rated, VI-V-5; Memo 4-5-3 paras. 23, 37–38, 90, 92
- whether acts as agent, Policy P-016

Purity level, refinement, see Precious metal

Purpose of acquisition or importation, *see* Change in use of capital property; Input tax credit; Use: in commercial activities

Purpose-built rental housing

- calculation of rebate, 256.2(3.2)
- defined, 256.2(3.1), Real Property (GST/HST) Regulations
- provincial rebate, 256.21; Real Property (GST/HST) Regulations

G

QC, see Qualifying consideration

QE, see Qualifying employer

QMPE, see Qualifying master pension entity

QRU, see Qualifying residential unit

QSIP, see Qualifying small investment plan

QST, see Quebec, special rules: Quebec Sales Tax

QTPPS, *see* Qualifying tangible personal property supply **Quail**

• zero-rated, Memo 4-4 para. 5

Qualifications of unlicensed health care professional, see Practitioner

Qualifying amount

 defined, for Ontario status Indian exemption, Credit for Provincial Relief (HST) Regulations s. 1

Qualifying compensation

· defined, for importation of service from foreign branch, 217

Qualifying consideration

- · defined, for importation of service from foreign branch, 217
- • includes amounts related to Lloyd's association, 217.1(9)(c)

Qualifying course

 defined, Deduction for Provincial Rebate (GST/HST) Regulations s. 1

Qualifying date

- defined, for HST real property transitional rules, New Harmonized Value-added Tax System Regulations, No. 2, ss. 48(1)
- grandfathering of new residential properties, New Harmonized Value-added Tax System Regulations, No. 2, ss. 51(1), 52(1), 53(1)

Qualifying employer

- defined
- • for employer supplies to pension plans, 172.1(10)
- • for pension plan rebate, 261.01(1); TIB B-XX4

Qualifying energy

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)

Qualifying establishment

· defined, for importation of service from foreign branch, 217

Qualifying food and beverages, see also Qualifying food, beverages and entertainment

- · Ontario HST
- • defined, Deduction for Provincial Rebate (GST/HST) Regulations s. 1
- • point-of-sale rebate up to \$4, Deduction for Provincial Rebate (GST/HST) Regulations Sch. 1, s. 11

Qualifying food, beverages and entertainment, see also Qualifying food and beverages

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)

Qualifying foreign currency

- defined, 211.19(1)
- rules for non-resident e-commerce supplier, 211.19

Qualifying fuel

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)

Qualifying group

• defined, 156(1); Memo 14-5 paras. 7-8

Qualifying health care supply

- · defined, V-II-1
- health care service must be, to be exempt, V-II-1.2

Qualifying heating oil

- PEI HST
- · · defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)
- • for point-of-sale rebate, *Deduction for Provincial Rebate* (GST/HST) Regulations s. 1

Qualifying housing supply

- defined, Electronic Filing and Provision of Information (GST/HST) Regulations s. 1
- penalty for failing to report amount, Electronic Filing and Provision of Information (GST/HST) Regulations ss. 9–11

Qualifying institution (for ITC allocation of financial institution)

• defined, 141.02(1)

Qualifying instrument

• defined, for importation of service from foreign branch, 217

Qualifying investment plan

 defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 55(2)

Qualifying investor

- defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 52(1)
- required to notify investment plan, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 52(6)

Qualifying master pension entity

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 7(1)

Qualifying member

defined, for election between related corporations, 156(1);
 Memo 14-5 paras. 9–13

Qualifying motor vehicle, see also Qualifying vehicle

- · for financial institution HST allocation rules
- defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)
- · for person with disabilities
- • defined, 258.1(1); Info Sheet GI-199
- • lease of, reduced tax, 258.1(7); Info Sheet GI-199
- rebate on bringing into HST zone, 258.1(6); Info Sheet GI-199
- • rebate on importation of, 258.1(6), 258.2; Info Sheet GI-199
- • rebate on purchase of, 258.1(2)–(5); Info Sheet GI-199
- for temporary recapture of HST ITCs for large businesses
- constitutes specified property or service, New Harmonized Value-added Tax System Regulations, No. 2 [NHRegs#2] s. 28(1)(a)
- • dealer vehicle not sold, RITC applies, NHRegs#2 s. 31(2)
- • defined, NHRegs#2 s. 26
- effect on taxable benefit, NHRegs#2 s. 37
- fuel, property or service for, constitutes specified property or service, NHRegs#2 s. 28(1)(b)–(d)
- • included in "specified property or service", NHRegs#2 s. 28(1)(a), 28(2)(f)
- • recaptured ITC calculation, NHRegs#2 s. 31(2)

Qualifying network seller, see also Network seller

- application to CRA, 178(3)
- defined, 178(2)

Qualifying newspaper

- · Ontario HST
- defined, Deduction for Provincial Rebate (GST/HST) Regulations s, 1
- • point-of-sale rebate, *Deduction for Provincial Rebate* (GST/HST) Regulations Sch. 1, s. 10

Qualifying non-profit organization, see Non-profit organization

Qualifying partnership

- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 2
- financial institution's percentage, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 27

Qualifying pension entity

• defined, for pension plan rebate, 261.01(1); TIB B-XX4

Qualifying portion of basic tax content

• defined, for new residential housing rebate, 256.2(1)

Qualifying private investment plan

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 7(3)

Qualifying residential unit

 defined, for new residential housing rebate, 256.2(1); New Harmonized Value-added Tax System Regulations, No. 2, s. 47(1)

Qualifying service

• defined, for importation of service from foreign branch, 217

Qualifying small investment plan

- application to be treated as, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 15
- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 7(2)
- election to be selected listed financial institution, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 14

Qualifying subsidiary

- defined, 123(1)
- used in determining whether corporations are closely related, 128(1)

Qualifying supply

 defined, for foreign bank subsidiary converting to branch, 167.11(1)

Qualifying tangible personal property supply, see also Nonresident e-commerce supplier (e.g., Netflix, AirBNB)

- defined, 211.1(1)
- · non-resident making
- • directly, required to register for and charge GST/HST, 211.22(2)
- through distribution platform, operator required to charge GST/HST, 211.23(1)(a)
- supply not deemed to be made outside Canada, 143(1)(b.1)

Qualifying taxpaver

- defined, for importation of service from foreign branch, 217.1(1)
- • includes activity of member of Lloyd's association, 217.1(9)(a), 217.1(11)(a)

Qualifying telecommunications services

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)

Qualifying vehicle, see also Qualifying motor vehicle

- defined, Non-Taxable Imported Goods (GST/HST) Regulations, s. 2; Value of Imported Goods (GST/HST) Regulations, s. 2(1)
- no tax on certain importations of foreign rental vehicle by Canadian resident, *Non-Taxable Imported Goods (GST/HST) Regulations*, s. 3(m)
- value for partial tax where importation is taxable, Value of Imported Goods (GST/HST) Regulations, s. 15

Qualifying voting control

- defined, 128(1.1), (4)
- required for closely related corporations, 123(1)"qualifying subsidiary"(a), 128(1)(a)

Quality testing, taxable, 146(a), V-VI-21

Quantities, see also Single servings

- baked goods, six or more under 230g each, zero-rated, VI-III-1(m), (q)(ii); Memo 4-3 paras. 89, 100
- beverages, single serving under 600ml, zero-rated, VI-III-1(n); Memo 4-3 paras. 27–34
- fertilizer, exceeding 500kg and 25kg per container, zero-rated, VI-IV-5; Memo 4-4 paras. 18, 30
- hay, exceeding 750kg, zero-rated, VI-IV-2; Memo 4-4 para.
 14 1
- ice cream, single serving under 500ml or 500g, zero-rated, VI-III-1(k); Memo 4-3 paras. 74–84
- land allowed for residential complex, 1/2 hectare, Policy P-069
- pudding, single serving under 425g, zero-rated, VI-III-1(n); Memo 4-3 paras. 27–34
- seeds, over 125g or 2500 seeds (small) or 5kg (large), zerorated, VI-IV-2, Memo 4-4 para. 10

Quarry, constitutes permanent establishment,

123(1)"permanent establishment"(a)(ii)

Quarterly

- filing, see Fiscal quarter
- instalments, see Instalments of tax

Quebec, special rules

- definition of lawyer, for solicitor-client privilege, 293(1)
- definition of real property, 123(1)
- distinction between lease and license, Policy P-062
- emphyteutic leases, Memo 19-1 paras. 29-30; Policy P-174
- harmonization with GST, see "Provincial Taxation" tab (Binder P2); Quebec Sales Tax Service
- provincial government entities pay HST, Memo 18-2 para. 23; Info Sheet GI-158
- Quebec Sales Tax, effect on direct cost, 123(1)"direct cost"(e), V-V.1-5.1(b), V-VI-6(b)
- sale of property for unpaid municipal taxes, 183(10), (10.1), Policy P-198

Oueen

• death of, Interpretation Act s. 46

Quick calculation method, non-resident tour package rebate, Memo 27-3 paras. 50-56

Quick Method of accounting, 227(1); Streamlined Accounting (GST/HST) Regulations ss. 15–21; TIB B-028; Memo 600-1, 600-4, see also Rebate: special quick method

Quinidine (drug), zero-rated, VI-I-2(e)(viii)

Ouitclaim

• constitutes seizure of property by creditor, 183(9)

Quota

- agricultural, zero-rated, VI-IV-10, Agricultural and Fishing Property (GST/HST) Regulations Sch:1(5)
- supplied by government, exempt, V-VI-20(c)

R

RDSP

- · defined, for HST place of supply rules
- after April 2010, New Harmonized Value-added Tax System Regulations s. 2
- · trustee services, whether HST applies
- after April 2010, New Harmonized Value-added Tax System Regulations s. 30

REOP, see Reasonable: expectation of profit

RESP, see also Registered education savings plan

- · defined, for HST place of supply rules
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 2
- · trustee services, whether HST applies
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 30

RGI, see Rent: geared to income

RITCTA, see Recapture input tax credit threshold amount

RRIF, see also Registered retirement income fund

- · defined, for HST place of supply rules
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 2
- · trustee services, whether HST applies
- after April 2010, New Harmonized Value-added Tax System Regulations s. 30

RRSP, see also Registered retirement savings plan

- · defined, for HST place of supply rules
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 2
- · trustee services, whether HST applies
- after April 2010, New Harmonized Value-added Tax System Regulations s. 29

RTA, see Reciprocal taxation agreement

Rabbit

- feed for, zero-rated, Agriculture and Fishing Property (GST/HST) Regulations Sch:1(2)(c)(ii); Finance news release 92-094; Memo 4-4 Schedule
- supply of zero-rated except in pet stores, VI-IV-1.1; Memo 4-4 para. 6

Racehorse, see Horse

Races, see Bets; Pari-mutuel betting, exempt; Place of amusement

Radio

• reproduction rights, charges by collective, 177(2)

Radio or television advertising, see Advertising

Radiological services

- constitute institutional health care service, V-II-1"institutional health care service"(a)
- exempt, V-II-2, V-II-10; Memo 300-4-2 paras. 18–19; Health Care Services (GST/HST) Regulations; TIB B-019

Radiopharmaceuticals

• zero-rated (Schedule C drugs), VI-I-2(a)

Radiotherapy

• exempt, V-II-1"institutional health care service"(e), V-II-2

Raffle tickets, see also Lottery

• sold by charity, exempt, V-VI-5.1

Rail terminal

• operation of, qualifies for joint venture election, *Joint Venture* (GST/HST) Regulations s. 3(1)(q)

Railway, see also Carrier; Conveyance

- corporation, charge to another for failure to return rolling stock, non-taxable, 162.1(b), 182(3)(b); Policy P-217
- demurrage charges, non-taxable, 162.1(a)
- · equipment and rolling stock
- • charge for failure to return, non-taxable, 162.1(b), 182(3)(b)
- • drop shipment of rolling stock, 179(7)
- emergency repair service to rolling stock, zero-rated, VI-V-6.1; Memo 4-5-3 para. 43; Policy P-217
- • importation of, whether taxable, VII-8; *Non-Taxable Imported Goods (GST/HST) Regulations* s. 3(h), (h.1)
- • meaning of "rolling stock", Policy P-217
- • lease of, place of supply for HST
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 26
- • valuation on import, Value of Imported Goods (GST/HST) Regulations ss. 9–11; TIB B-031
- export by, evidence of, Memo 4-5-2 Appendix A.2.B
- junction and switching charges, supplied to unregistered nonresident carrier, zero-rated, VI-V-2; Memo 4-5-3 para. 29; Policy P-076
- travel, see Passenger transportation service

Raising capital

• expenses, input tax credits for, 185(1)

Ramp, for wheelchair

- installation in vehicle, see Conversion: of vehicle for use by disabled
- zero-rated, VI-II-16, VI-II-17; Memo 4-2 paras. 24, 25

Rare book, folio or manuscript, see Specified tangible personal property

Rate

- of GST
- • 0%, zero-rated supplies, 165(3)
- • 5%, 165(1), 212, 218
- · of HST
- • additional 8%, 165(2), 212.1, 218.1, 220.05–220.08
- · of interest, see Interest

Rate (cont'd)

- of Quick Method calculation, Streamlined Accounting (GST/HST) Regulations s. 15(5)
- reduction, see Transitional rules (7% to 6% rate)

Reaching aids

• zero-rated as medical devices, VI-II-39; Memo 4-2 para. 58

Re-acquisition of residential property

• by builder after sale, V-I-4(b), V-I-5

Reagents

- blood-coagulation, zero-rated, VI-II-29.1(b)
- urinary-sugar or urinary-ketone testing, zero-rated, VI-II-29; Memo 4-2 para. 47

Real estate, see Real property

Real estate agent

- arranging for transfer of share in co-op, taxable, 123(1)"financial service"(r.1); Policy P-048
- commission, taxable, 165(1)

Real property, Memo 19-1, see also Capital property; Change in use of capital property; Land; Residential complex; Use: in commercial activities

- adverse possession, Policy P-178
- capital property, see Capital property
- change in use, Memo 19-4-2, see also Change in use of capital property
- · combined supply including, see Combined supply
- construction of, see Construction
- conversion to residential or personal use, 190
- deemed supplies of, Memo 19-4-2
- defined, 123(1); Memo 19-1
- deposit on, 168(9); Memo 300-6-8; Memo 19-1 paras. 66-71
- excluded from taxable supplies for determining reporting period, 249(1), (2)
- exempt supply made, no subsequent input tax credit, 225(5)
- HST on, IX-IV-1, see also Place of supply: province
- • transitional application, 349(1), 350, 351; TIB B-077
- holdbacks, not taxed, 168(7); Memo 300-6-14; Memo 19-1 paras. 81–84
- improvement to, see Capital property; Improvement (to capital asset or property)
- · incorrect statement as to use of, 194
- input tax credit for, Memo 19-1 paras. 98–102, see also Capital property; Input tax credit
- intangible property relating to, supply deemed made in Canada, 142(1)(c)(ii), (2)(c)(ii); Policy P-200R
- joint venture election, 273; *Joint Venture (GST/HST) Regulations*; TIB B-021
- land, Memo 19-5
- lease or licence to use deemed to be supply of, 136(1)
- · licence to use
- • supplied by charity, exempt, V-V.1-1
- supplied by public institution or public sector body, not exempt, V-VI-25(f)
- non-substantial renovation, 192; Memo 19-2-3 paras. 68-76
- option on, Memo 19-5 paras. 63-68
- place of supply
- GST (whether in/outside Canada), 142(1)(d), 142(2)(d); Memo 19-1 paras. 32–38
- • HST (whether in a participating province), IX-IV-1

- progress payments, see Progress payment on construction contract
- rate reduction from 7% to 6%, TIB B-006
- rentals of, Memo 19-4-1
- residential, see Residential complex; Residential property
- sale of, Memo 19-4-1
- • agreement entered into before October 14, 1989, 336(2)–(4)
- • by charity, not included in simplified accounting calculation, 225.1(1)(a), 225.1(2)A(b)(i); Info Sheet GI-066
- • by non-registrant, recovery of tax paid, 257; Memo 19-3-6
- by public service body, whether exempt, V-V.1-1(j)-(m), V-VI-25
- by registrant, to registrant, 221(2), 228(4); Memo 19-1 paras. 85–91
- • by small supplier, tax payable if a taxable supply, 166
- • defined, Policy P-111R
- • exceptions to requirement to collect tax, 221(2)
- • exempt, V-I
- • input tax credit, 193; Memo 19-2-3 paras. 102, Appendix
- • purchaser not knowing sale not exempt, 194
- • rebate, 257; Memo 19-3-6
- recovery of earlier tax, 193, 257; Memo 19-2-3 paras. 102, Appendix; Memo 19-3-6
- • residential property, see Residential complex: sale of
- • transitional rules, 336
- • versus construction contract, Memo 19-1 paras. 92–97
- • when tax payable, 168(5); Memo 300-6-5
- seizure by creditor, subsequent use, 183(4)
- · service relating to
- HST place of supply, New Harmonized Value-added Tax System Regulations s. 14
- meaning of, Memo 4-5-3 paras. 14–20, 22; Memo 19-1 paras. 39–46; Policy P-169R
- • whether supply made in Canada, 142(1)(d), (2)(d); Policy P-
- whether supply zero-rated, VI-V-7(d), VI-V-23(b); Memo 4-5-3 paras. 14–20, 22
- · situated in Canada
- service relating to, taxable, 142(2)(d), VI-V-7(d), VI-V-23(b); Memo 4-5-3 paras. 14–20, 22; Policy P-200R
- · situated outside Canada
- •• service relating to, non-taxable, 142(2)(d), VI-V-7, 217"imported taxable supply"(a)(iii); Memo 4-5-3 paras. 14–20, 22; Policy P-200R
- statement as to use of, 194
- storage facilities, Policy P-074
- supply of, constitutes commercial activity, 123(1)"commercial activity"(c)
- supply of, exempt, V-I; Memo 19-2-1, 19-2-2
- apartment building converted to condominiums, V-I-4(a); Memo 19-2-1, paras. 35–36
- • by individual, trust or estate, V-I-9
- • by public sector body, 193(2), V-VI-25
- • farmland, V-I-10, V-I-11, V-I-12
- • for mobile home, V-I-7; Memo 19-2-2 para. 14
- • home reacquired by builder, V-I-4(b)
- • residential rent, V-I-6; Memo 19-2-2 paras. 1-11
- ••• meals with, V-I-6.2; Memo 19-2-2 para. 9

Real property (cont'd)

- self-supplied complexes, tax already paid, V-I-3, 4, 5; Memo 19-2-1 paras. 26–39
- short-term accommodation, V-I-6(b); Memo 19-2-2 paras.
 1–11
- transferred to insurer on settlement of claim, 184(1)(c)–(d), 184(3)
- when tax payable, 168(5); Memo 300-6-5; Memo 19-1 paras.
 59–84

Real reporting period

 defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 55(2)(b)(i)

Real-time calculation

 election for (financial institution HST apportionment rules), Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 49

Reasonable

- allocation of consideration between supplies, 153(2), 167(1)(a)
- allowance reimbursed to employees, input tax credit available, 174; Memo 9-3; Policy P-075R
- amount reimbursed to amateur competitors or performers, exempt supply, V-VI-11
- change to instalment contract entered into before November 1989, effect on FST transitional rule, 118(6)
- expectation of profit, 123(1)"commercial activity"; Policy P-176R; Memo 19-5 Appendix B
- grounds for search warrant, 290
- method of determining use of supplies in commercial activity required to be, 141.01(5), 141.02(16); Memo 8-3 para. 33–49; GST 700-5-1
- period for early-payment discount or late-payment charge, discount or charge ignored, 161, 182(3); Memo 3-9
- quality, nature and cost of goods required for input tax credit, 170(2)(a); Memo 8-2 para. 21
- value of goods required for input tax credit, 170(2)(b); Memo 8-2 para. 21
- written notice, required for cancellation of registration by Minister, 242(1)

"Reasonably regarded as incidental"

• meaning of, Policy P-159R1

Reassessment, see also Assessment

- appeal from, 302, 306
- constitutes assessment, 123(1)"assessment"
- limitation period (normally four years), 298(1), (4)
- of rebate, 297(2), 298(2)
- on application of general anti-avoidance rule, 274(6)–(8); TIB B-046
- provision for, 296(1), (6)
- upon notice of objection, 301(3)

Rebate, *see also* Rebate (of tax); Refund; Remission of tax; Volume rebates or discounts

• by manufacturer to consumer, 181.1; Memo 300-7-6

Rebate (of tax), see also Net tax: deductions from; Refund; Remission of tax

- allowance on assessment, in place of input tax credit, 296(2.1)
- amount paid in error, 261
- assessment, reassessment and payment of, 297(1)–(3), 298(2)
- bankrupt person, restriction, 263.1; Policy P-162

- builder crediting directly to purchaser, 234(1)
- · charities, see also Charity
- • exports for charitable purposes, 260; Policy P-132
- • GST paid by, 259; Memo 500-4-9
- • simplified calculation, *Public Service Body Rebate* (GST/HST) Regulations ss. 6–8; TIB B-070
- conventions, see Convention
- cooperative housing, 255; Memo 19-3-3, see also New housing rebate
- defective goods imported, 215.1(2)–(3)
- employees, for GST on amounts deductible for income tax purposes, 253; Memo 500-4-6; Policy P-028 (obsolete), P-113P
- FST
- • inventory, 120, see also Federal Sales Tax (FST)
- • new housing, 121, see also New housing rebate: FST
- floating home, 256(2.2)
- foreign diplomats, see Diplomats
- form and filing of, 262
- goods removed from HST province, 261.1; TIB B-080
- HST, provincial portion, TIB B-080
- • books, at point of sale, 234(3), 259.1
- general limitations, 261.4
- goods removed from participating province, 261.1
- • imported goods not for use in participating province, 261.2
- intangible property not for use in participating province, 261.3
- management and administrative services, financial institution, 261.31(2); New Harmonized Value-added Tax System Regulations, No. 2, s. 21.1
- • public service bodies, 259(3)(b), 259(4)(b)
- • selected listed financial institution, limitations, 263.01
- • service not for use in participating province, 261.3
- hospital, Policy P-245, see also selected public service body (below)
- housing, 121, 234(1), 254–256, 256.2; New Harmonized Value-added Tax System Regulations, No. 2, ss. 40–47, 56–57, 58.09–58.1; Memo 19-3, see also New housing rebate
- · importation of goods
- • excess tax paid, 216(6)
- • returned, damaged or defective goods, 215.1
- imported goods not for use in HST province, 261.2
- incorrectly charged tax, 261
- Indian bands, TIB B-048
- input tax credit incorrectly claimed in place of, 296(2.1)
- intangible property not for use in HST province, 261.3; TIB B-080
- interest on, after 30 days, 297(4); TIB B-100
- land leased for residential purposes, 256.1; Memo 19-3-5
- legal aid society, 258; Memo 13-2
- mobile home, 254(2), 256(2.2), see also New housing rebate
- motor vehicle adapted for use with wheelchair, 258.1, 258.2;
 Info Sheet GI-199
- municipality, see also selected public service body (below)
- sale of personal property of, 257.1
- new housing, 121, 234(1), 254–256, 256.2, 256.21; New Harmonized Value-added Tax System Regulations, No. 2, ss.

Rebate (of tax) (cont'd)

- 40–47, 56–57, 58.09–58.1; Memo 19-3, *see also* New housing relate
- non-profit organization, 259(2), (3); Memo 500-4-8
- non-resident, 252-252.5, see also Non-resident: rebate
- not permitted if input tax credit or other refund available, 263
- Nova Scotia, see Nova Scotia: rebate
- · overpayment of, to be repaid, 264
- where credit or debit note issued, 232(3)(d), 259(4.01)(c), 263(d)
- owner-built home, 256; New Harmonized Value-added Tax System Regulations, No. 2, s. 46; Memo 19-3-5, see also New housing rebate
- owner of land leased for residential purposes, 256.1; Memo 19-3-5
- partners, for GST on amounts deductible for income tax purposes, 253; Memo 500-4-6
- payment made in error, 261
- printed books, 259.1; Memo 13-4
- provincial government organization, 259(1)"non-profit organization"
- public service bodies, 259
- qualifying non-profit organization, 259; Memo 500-4-8
- rental property, 256.2; New Harmonized Value-added Tax System Regulations, No. 2, s. 47; TIB B-087
- · repayment of, 264
- where credit or debit note issued, 232(3)(d), 259(4.01)(c), 263(d)
- restrictions on, 263, 263.02, 263.1; TIB B-100; Policy P-162
- returned goods after importation, 215.1(1)
- returns must be filed first, 263.02
- sale of real property by non-registrant, 257; Memo 19-3-6
- school authority, see selected public service body (below)
- selected public service body, 259; Public Service Body Rebate (GST/HST) Regulations; TIB B-025; Memo 500-4-2, 500-4-3, 500-4-4
- • provincial sales tax, HST provinces, 259(3)(b), 259(4)(b)
- • simplified calculation of, *Public Service Body Rebate* (GST/HST) Regulations ss. 6–9
- separate applications by branches, 261(5)–(6)
- service not for use in HST province, 261.3; TIB B-080
- set-off against net tax to be remitted, 228(6); Policy P-194R2 [cancelled in light of Villa Ste-Rose case]
- simplified method, TIB B-070
- special quick method, 259(12)–(14); Streamlined Accounting (GST/HST) Regulations s. 19–21; Memo 600-2
- supplier crediting directly to non-resident convention delegate or visitor, 234(2)
- tax wrongly charged, 261; Policy P-037
- time limit for assessment and reassessment, 298(2)
- tour operators before 2018, 252.1(3), see also Non-resident: rebate
- transitional credit for small business, 346(1)(b); Memo 200-9
- • time limit for application, 346(3)
- transportation services, tax paid in error, 261; Policy P-037
- university, see selected public service body (above)
- vehicle adapted for use with wheelchair, 258.1, 258.2
- visitors to Canada, 252-252.2, see also Non-resident: rebate

Rebuilt goods, eligible for FST inventory rebate, 120(1)"tax-paid goods"(b)

Recapture input tax credit threshold amount

• defined, for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 27(3)

Recapture of input tax credits, *see also* Change in use of capital property

- automobile leases, 235
- meals and entertainment, 236
- on ceasing to be registered, 171(3), (4)
- Ontario/BC/PEI HST, 236.01; New Harmonized Value-added Tax System Regulations, No. 2, ss. 26–38; TIB B-104
- builders in PEI, Info Sheet GI-165
- • goods or services purchased for resupply, New Harmonized Value-added Tax System Regulations, No. 2, s. 28(2)(g)(i)
- • Ontario phase-out 2015-2018, Info Sheet GI-171
- • optional instalment method, New Harmonized Value-added Tax System Regulations, No. 2, ss. 35–36
- • partner rebate, effect on, 253(2) opening words
- pension plan expenses, 172.1

Recapture period

• defined, for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 26

Recapture rate

- · defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)
- • for Ontario/PEI large business ITC recapture rules, *New Harmonized Value-added Tax System Regulations*, *No.* 2, s. 26

Receipt

- constitutes invoice, 123(1)"invoice"
- disclosure of tax on, required, 223(1)–(1.2); Disclosure of Tax (GST/HST) Regulations; Memo 3-1 paras. 43–46; TIB B-013; Policy P-116, P-118R
- of dividends, constitutes financial service, 123(1)"financial service"(f)
- of money, constitutes financial service, 123(1)"financial service"(a)
- used as coupon for discount, 181
- where not issued by agent in name of vendor, 177(1) [repealed], 177(1.1) [repealed]

Receivables, see Debt security

Receiver, 266

- certificate required before distribution of property, 270
- defined, 266(1), 270(1)
- effect of appointment of, 266(2)
- fees of, transitional rules
- • GST, 341.1(2); Policy P-041 (obsolete)
- • HST, 357(2); TIB B-077
- General, see Receiver General
- not an "officer", 123(1)"office"(b)
- reporting period deemed ended and restarted, 266(2)(e)
- seizure/repossession rules do not apply, 183(11)

Receiver General

- garnishment, requirement to pay to, 317
- payment of amounts to, 278(2), (3)
- payment of instalments to, 237(1)
- repayment of overpayment of rebate to, 264(1)

Receiver General (cont'd)

- repayment of overpayment of refund to, 230.1
- tax to be remitted to, 219, 220.09, 228(2), 228(2.1), (2.3), (4), (5), 337(6), 340(2), 352(9), (10), 354(2)

Receivership, see Receiver

Reception (or private party)

 exclusion from exemption for supplies of food services, V-III-12, 14; Memo 20-5

Reception of telecommunication service

• effect on place of supply, 142.1(2)

Recipient, see also Supplier; Supply

- cannot sue supplier for collecting tax, 224.1
- defined, 123(1)
- • re inclusion of PST in GST base, 154(3)
- liable for tax, 165(1), 165(2), 218, 218.1; Memo 3-1 paras. 4–13
- ultimate, defined (re buying groups), 178.6(1); Memo 1-5
- where knew or ought to have known sale of real property not exempt, 194

Reciprocal arrangements for communication of information between governments, 295(5)(b)

Reciprocal taxation agreement

• text of, 123"specified Crown agent" (Analysis)

Reconciliation

- election for, by investment plan (re HST apportionment rules), Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 50
- method for calculating large business's Ontario/BC ITC recapture, New Harmonized Value-added Tax System Regulations, No. 2, ss. 35, 36

Reconciliation statement, for equal billing plan, *see* Budget payment arrangement

Reconsideration of assessment by Minister

- upon notice of objection, 301(3), (4)
- where appeal allowed by Tax Court, 309(1)(b)(ii)

Reconstituted fruit juice in beverages, whether zero-rated, VI-III-1(d)(ii); Memo 4-3 paras. 19–26

Reconstructive surgery, exempt, V-II-2, 5

Record(s), see also Books and records

- constitutes invoice, 123(1)"invoice"
- defined, 123(1)
- requirement to keep, 286
- sufficient to establish input tax credit, 169(5)
- · where separate accounting records kept
- • application to file separate returns, 239
- branches of public service bodies, application to be considered separate for small supplier status, 129

Recording of seismic data

• joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(o)

Recoverable amount

• defined, for pension plan rebate, 261.01(1); TIB B-XX4

Recovery of bad debt, addition to net tax, 231(3); Policy P-058R

Recovery of input tax credits, see Recapture of input tax credits

Recreation, see also Entertainment; Place of amusement

- · camp, see Camp
- · club dues
- • no input tax credit, 170(1)(a); Memo 8-2 paras. 2-7
- • not exempt, V-VI-17
- courses
- • exempt (for children, disabled or underprivileged), V-VI-12
- • not exempt, V-III-16, V-V.1-1(f), V-VI-2(j)
- · fishing, see Fishing
- outdoor, classes or activities involving, exempt, V-VI-12
- real property used for, sale of exempt, V-I-9(2)(a)
- right to participate in, supplied by charity, not exempt, V-V.1-1(g), V-VI-2(h)
- trailer or vehicle for recreational use, excluded from mobile home, 123(1)"mobile home"

Recreational vehicle

· lease of by non-resident, whether taxable, Policy P-193R

Recycler

• defined, for returnable containers, 226(1)

Recycling

- exempt, V-VI-20(h)
- · returnable containers
- • defined, 226(1)
- no direct-cost (nominal consideration) exemption, 226.01 [repealed]
- • supply between recyclers, 226(7)
- • supply of recycling service to distributor, 226(6)
- whether exempt as basic garbage collection service, Policy P-199R

Red Cross

• supply of blood products, V-V.1-5

Redemption

- · coupon, see Coupon
- following sale of property for unpaid municipal taxes, Policy
- property sold by creditor, 183(10.1); Policy P-198
- • no ITC to debtor until redemption period expires, 193(3)
- • no rebate to debtor until redemption period expires, 257(3)

Reduction in purchase price, see Discount on purchase price

Reference of common question to Tax Court, 310

Referral fees

• whether contingent amounts included in "debt security", Policy P 170

Refiling GST return, see Adjustment to GST return

Refinement of timber resource

• joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(g)

Refining

- crude oil, importation for, no tax, VII-8; *Non-Taxable Imported Goods (GST/HST) Regulations* s. 3(e)
- gold, silver or platinum, see Precious metal

Refining service

 precious metal, for unregistered non-resident, zero-rated, VI-V-6.3

Refrigerator, see Appliance: kitchen

Refuelling

- does not constitute "stopover", VI-VII-1(1) "stopover"; Memo 28-3 para. 12
- ends a "leg" of a journey, New Harmonized Value-added Tax System Regulations ss. 21–22; Memo 28-3 para. 7

Refund, see also Net tax; Rebate; Remission of tax

- · by supplier
- credit note or debit note, 232(3); Memo 12-2; TIB B-042; Policy P-030R
- net tax, see of negative net tax (below)
- · of income tax, discounter of, see Income tax refund discounter
- of negative interim net tax (selected LFI), 228(2.4)
- · of negative net tax
- • all returns must be filed first, 229(2); TIB B-100
- • corporate director liable, 323(1)
- • interest on, 229(3), 230(3); TIB B-100
- • overpayment of, 230.1
- • payment of, 229(1)
- • set-off against tax owing, 228(6); Policy P-194R2 [cancelled in light of Villa Ste-Rose case]
- of overpaid tax, 230
- • all returns must be filed first, 230(2)
- • assessment, 296(3)(b)
- on assessment
- • all returns must be filed first, 296(7); TIB B-100
- returnable containers, defined, 226(1)

Regional municipality

• supply to/from local municipality exempt, V-VI-28(c)

Registered Canadian amateur athletic association, see also Amateur athletic association

• constitutes charity, 123(1)"charity"

Registered charity, see Charity

Registered disability savings plan, see also RDSP

- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(vi.1)
- · defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)
- • for financial services definition, Financial Services and Financial Institutions (GST/HST) Regulations s. 2(2)

Registered education savings plan, see also RESP

- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(vi)
- defined
- for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)
- • for financial services definition, Financial Services and Financial Institutions (GST/HST) Regulations s. 2(2)
- trustee services, place of supply for HST
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 30

Registered nurse and registered nursing assistant, see Health care services, exempt

Registered party

- · defined, V-VI-1
- fund-raising event, donation included in consideration, V-VI-18 2
- membership in, exempt, V-VI-18.1
- supplies by, whether exempt, V-VI-18.2

Registered pension plan, see also Pension plan

- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(i)
- constitutes selected listed financial institution, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 13, 3(f)
- defined, 123(1), 149(5)(a)
- expenses paid by employer, 172.1; TIB B-032; Notice 257
- public service body, of, Policy P-197
- rebate to, 261.01; TIB B-XX4
- supplies by employer to, tax on, 172.1; TIB B-XX4
- tax adjustment notes, TIB B-XX4; Notice 261

Registered practical nurse or registered psychiatric nurse

• exemption for services, V-II-6

Registered retirement income fund, see also RRIF

- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(vii)
- · defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)
- • for financial services definition, Financial Services and Financial Institutions (GST/HST) Regulations s. 2(2)
- · plan or account fee
- deposit account, exempt, 123(1)"financial service"(b); Memo 17-2 item A-42
- • self-directed plan, taxable, 123(1)"financial service"(q); TIB B-057, item O-4; Memo 17-2 item E-29
- trustee services, place of supply for HST
- after April 2010, New Harmonized Value-added Tax System Regulations s. 30

Registered retirement savings plan, see also RRSP

- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(iv)
- · defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)
- • for financial services definition, Financial Services and Financial Institutions (GST/HST) Regulations s. 2(2)
- plan or account fee
- deposit account, exempt, 123(1)"financial service"(b); Memo 17-2 item A-41
- self-directed plan, taxable, 123(1)"financial service"(q); TIB B-057, item O-4; Memo 17-2 item E-29
- · trustee services, place of supply for HST
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 30

Registered supplementary unemployment benefit plan

- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(iii)
- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)

Registered supplementary unemployment benefit plan (cont'd)
• financial institution's percentage, for HST allocation rules,
Selected Listed Financial Institutions Attribution Method
(GST/HST) Regulations s. 37

Registrant, see also Input tax credit; Non-registrant; Registration

- · appropriation of property for personal use, 172
- barter of property between, deemed at nil consideration, 153(3); Policy P-221
- · becoming, see Becoming a registrant
- · ceasing to be, see Ceasing to be a registrant
- defined, 123(1)
- includes selected listed financial institution that is part of group required to register, 240(1.3), (1.4)
- · drop-shipping property on behalf of non-resident, 179
- entitlements and obligations, Memo 3-1 paras. 35-47
- filing of returns, 238(1)
- input tax credits, see Input tax credit
- non-, see Non-registrant
- reporting period, 245(2)

Registration (for GST/HST), 240-242; Memo 2-1-2-7

- application for, 240; Memo 2-1 paras. 19-30
- by non-resident, see Non-resident: registration
- by person who is required to be registered, 241(1.3)–(1.5)
- cancellation of, 171(3), (4), 242; Memo 2-7
- continues during bankruptcy, 265(1)(e)
- deadline for application, 240(2.1)–(2.3)
- effective date of, 241(1)
- form, 240(5)
- group of selected listed financial institutions, 241(1.1)–(1.2)
- • cancellation of, 241(1.1)
- • removal of member from group, 241(1.2)–(1.3)
- required, 240(1.3)–(1.4); Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 56(3)
- holding companies, 240(3)(d)
- · joint venture participant, Policy P-138R
- mandatory, see required (below)
- number issued by Minister, 241(1); Memo 2-1 paras. 19–26, see also Business Number
- defined, Publications Supplied by a Non-resident Registrant Regulations s. 2
- • where not disclosed on supply by agent, 177(1) [repealed]
- of condominium, 168(5)(a), 191(2), 336(4)
- of property, fees for, exempt, V-VI-20(a)
- optional, see voluntary (below)
- proof of non-registration, Memo 4-5-1 Appendix B; Policy P-009
- required, 240(1); Memo 2-1
- prescribed selected listed financial institution, 240(1.2);
 Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 56(1), (2)
- • group, 240(1.3), (1.4)
- • small suppliers excepted, 148, 148.1, 240(1)(a); TIB B-041
- taxi operator, 240(1.1), 240(3.1), 241(2)
- voluntary, 240(3), (3.1); Memo 2-3
- corporation incorporated for butterfly transaction, Policy P-045

- • holding corporation, 240(3)(d); Policy P-032
- partner not engaged in separate commercial activity, Policy P-216

Registration information

- defined, re disclosure of confidential information, 295(1)
- disclosure of, 295(5)(j)

Registration number, see Registration (for GST/HST): number

Regular or continuous basis

· meaning of, Policy P-205R

Regulations, see also Prescribed

- authority for, 277
- • generally, 277
- • Harmonized sales tax (HST), 277.1
- defined, Interpretation Act s. 41(4)
- · retroactive
- • generally, 277(2)
- retroactivity, 277(2)(d)
- sunset provision, HST regulations, 277.1(3)

Regulatory body

- courses and examinations exempt, V-III-6; Memo 20-4
- · defined, V-III-1
- membership dues exempt, V-VI-18
- regulatory program, cost-recovery fees exempt, 189.1

Rehabilitative care

• provided at health care facility, V-II-1"health care facility"(a)

Reimbursement

• defined, Games of Chance (GST/HST) Regulations s. 5(1)

Reimbursement of expenses

- by client, included in invoice for services, taxable, former 178
- of warranty holder, 175.1
- · to employee or partner
- allowance for travel or other expenses, tax deemed paid, 174; Memo 9-3
- credit card expenses charged to employer, Policy P-184
- for expense that includes GST or HST, tax deemed paid, 175; Memo 9-4
- • meaning of, Policy P-075R
- • taxable benefit, 173(1)(b); Memo 9-2
- to volunteer, by charity, 175; Memo 9-4

Reinsurance

- excluded from Division IV tax on financial institutions, 217"loading"(a), 217"permitted deduction"(k.1)
- policy of, constitutes insurance policy, 123(1)"insurance policy"(a)(i)
- rules for Lloyd's association, 217.1(11)

Related, see also Associated persons

- · convention supplies, see Related convention supplies
- corporation, expenses relating to shares or debt of, 186(1), (3);
 Memo 8-6; Policy P-032, P-094R, P-137
- group, see Closely related: group
- persons, defined, 126
- use of property, see Use: in commercial activities

Related convention supplies, Memo 27-2

• defined, 123(1); Memo 1-5, 27-2 paras. 43-44, Appendix 1

Related convention supplies (cont'd)

- exclusion from tax, 167.2; Memo 27-3 paras. 98–105
- rebate of tax, 252.4(1); Memo 27-3 paras. 55-63

Relation

defined, for new housing rebate, 254(1), 254.1(1), 255(1), 256(1), 256.2(1); New Harmonized Value-added Tax System Regulations, No. 2, ss. 41(1), 45(1), 46(1), 47(1); Memo 19-3 para. 13

Release

- · of goods brought into Canada
- • defined to follow Customs Act, 123(1)
- goods not released, deemed to be outside Canada for zerorating of transportation services, VI-VII-1(1)"place outside Canada"
- • place of supply of service of arranging for
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 25
- • supply before, deemed to be made outside Canada, 144
- · of rights to sue
- • payment for, whether taxable, 182(1); Policy P-218R

Relevant assets, defined, 266(1)

Relevant completion date

• defined, for Nova Scotia new housing rebate, 256(2.02)

Relevant time

• defined, for NPO nursing home rebate, 259(4.12)

Relevant transfer date

 defined, for Nova Scotia new housing rebate, 254(2.01), 254.1(2.01), 255(2.01)

Reliance

- on purchaser's certificate that property will be exported, 221(3.1)
- on shipper's certificate that property will be exported, 221(3)
- on vendor's statement re exempt residential property, 194

Relief of poverty, suffering or distress

• food or accommodation exempt, V-V.1-5.2, V-VI-14

Religious communal organization

• excluded from self-supply rules, 191(6.1)

Reload centres

 services supplied at, Memo 28-2 paras. 21–22; Policy P-050 (obsolete)

Relocation

- of building from land, Memo 19-2-4 paras. 11–18; Policy P-154
- of fire hydrant at property owner's request, V-VI-21; Policy P-177R

Remaining duties payable

 defined, Value of Imported Goods (GST/HST) Regulations s. 2(1)

Remaining pension rebate amount

defined, 261.01(3.3)

Remanufactured goods, eligible for GST inventory rebate, 120(1)"tax-paid goods"(b)

Remembrance Day poppies and wreaths, *see* Poppies and wreaths (for Remembrance Day)

Remission of tax, *see* text of remission orders (reproduced after the Regulations)

Remittance of tax

- attorned rents, on, Policy P-131R
- by mail, deemed not remitted until received by Receiver General, 334(2)
- failure to remit, interest and penalty, 280, see also Failure
- interference with, by secured creditor, 323.1 (draft)
- non-resident performer, 238(3); Policy P-134R
- obligations of federal and provincial governments and agents, 122; Specified Crown Agents (GST/HST) Regulations; TIB B-006, B-012, B-036; Memo 18-2
- over \$10,000 after 2023, must be electronic, 278(3)
- over \$50,000 before 2024, required to be made through financial institution, 278(3); Memo 7-5 para. 3
- · remission orders, reproduced after GST Regulations
- required, 219(b), 228(2), (4)
- • selected listed financial institution, 228(2.1)–(2.3); TIB B-083R
- third party, by, whether acceptable, Policy P-131R

Remote Stores

• supplies to Indians by, P-246

Remote work site, exception to self-supply rules, 191(7); Memo 19-2-3 paras. 51–58; Policy P-090

Remoteness from any established community

• meaning of, Policy P-090

Removal

- of building from land, Memo 19-2-4 paras. 11–18; Policy P-154
- road or traffic signs, lights or barriers, exempt, V-VI-21.1(a)
- snow, ice or water, exempt, V-VI-21.1(b)
- vegetation, exempt, V-VI-21.1(c)

Rendered

• meaning of, Policy P-206

Renovation (of real property), see also Construction

- building materials for, FST inventory rebate, 120(1)"inventory"(b)
- contract for
- • timing of tax liability, 168(3)(c)
- non-substantial, 192; Memo 19-2-3 paras. 68-76
- substantia
- conversion to residential use after, 190(1); Memo 19-2-3 paras. 80–84
- defined, 123(1); Memo 19-2 paras. 49–51; Memo 19-3-7 paras. 10–16; Policy P-155; TIB B-092
- • floating home, timing rule, 190.1(2)
- • mobile home, timing rule, 190.1(2)
- new housing rebates, 121, 254–256, 256.2; Memo 19-3;
 Memo 19-3-7 paras. 23–32, see also New housing rebate
- • person who carries on deemed to be a builder, 123(1)"builder"(a)(iii), (b)(ii)
- • self-supply rules, 190, 191

Rent, see also Lease (or license)

- geared to income housing, municipal designation of organization, Info Sheet GI-124
- attornment of, remittance of tax by creditor, Policy P-131R
- prepayment of, transitional rules, 340
- residential, exempt, V-I-6; Memo 19-2-2 paras. 1-11
- • meals supplied with, V-I-6.2; Memo 19-2-2 para. 9

Rent (cont'd)

- • supplies for, not eligible for public service body rebate, Public Service Body Rebate (GST/HST) Regulations s. 4(1)(a); TIB B-025
- to own, agreement for, Policy P-164

Rent-to-own agreements

• whether subject to self-supply rule, Memo 19-2-3 paras. 16-23

Rental assets

• FST inventory rebate, Policy P-133

Rental housing

 new housing rebate, 256.2; New Harmonized Value-added Tax System Regulations, No. 2, s. 47; TIB B-087

Reorganization, see Corporation: reorganization

Repair, see also Warranty

- conveyance imported for, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(f)
- emergency service, to cargo container or conveyance, zerorated, VI-V-6; Memo 4-5-2 paras. 30–33; Memo 4-5-3 paras. 39–42; Policy P-067R
- goods temporarily imported for, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(c)
- lottery corporation, by, of equipment used by distributor, deemed not a supply, 188.1(4)(a)(iii)
- medical device, zero-rated, VI-II-34; Memo 4-2 para. 62
- oceanic telegraph cable, supply to non-resident for use in zerorated, VI-V-2(c); Memo 4-5-2 para. 21(c)
- property covered by insurance claim, self-supply, Memo 17-16 para. 37; Policy P-014
- real property, see Construction; Renovation
- road or traffic signs, lights or barriers, exempt, V-VI-21.1(a)
- roads or sidewalks, exempt, V-VI-21.1(d)
- service supplied to unregistered non-resident carrier, zero-rated, VI-V-2; Memo 4-5-3 para. 29; Policy P-076
- tangible personal property, place of supply for HST
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 29
- · water, sewage or drainage system, exempt, V-VI-22

Repeal of FST, 118, see also Federal Sales Tax (FST)

Replacement parts, under warranty

- no GST on importation, VII-5
- no HST on bringing into participating province, X-I-14
- supplied to non-resident, zero-rated, VI-V-13; Memo 4-5-3 paras. 55–57

Replacing

• road or traffic signs, lights or barriers, exempt, V-VI-21.1(a)

Reporting entity election

 for investment plans, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 53; Notice 260

Reporting institution

 defined, for information return for financial institutions, 273.2(1)

Reporting period, Memo 500-2, *see also* Fiscal month; Fiscal quarter; Fiscal year

- annual, 245(2)(a) [repealed], 248
- bankruptcy, on, 265(1)(g)
- defined, 123(1), 245

- • for Division IV tax, 217 [repealed]
- • for non-residents, electronic commerce, 211.18(2)
- designated, no GST return required, 238.1, TIB B-072
- elections for, 246–250
- following election under subsec. 150(1), Policy P-033
- HST transitional year, election, 363.1; New Harmonized Valueadded Tax System Regulations s. 57
- monthly, 245(2)(b), 246
- • election to change in HST transitional year, 363.1(a), (b)(i); New Harmonized Value-added Tax System Regulations s. 57
- non-registrant, 245(1)
- quarterly, 245(2)(c), 247
- election to change in HST transitional year, 363.1(b)(ii);
 New Harmonized Value-added Tax System Regulations s. 57(b)(ii)
- receivership, on, 266(2)(e)
- registrant, 245(2)
- separate
- on bankruptcy, 265(1)(g)
- • on becoming registrant, 251(1)
- • on ceasing to be registrant, 251(2)
- • on receivership, 266(2)(e)
- unfinished, Court order for collection action, 322.1

Reports or publications, see Newsletter

Repossession of property on default

- GST rules applicable, 183, see also Seizure of property
- • meaning of "repossession", Policy P-102
- residential complex, resale by builder exempt, V-I-4

Representative

- defined, for clearance certificate rules, 270(1)
- of artist, supply by, 177(2), Artists' Representatives (GST/HST) Regulations; TIB B-009
- of foreign government, see also Diplomats
- • tourist literature imported by
- • no GST on importation, VII-3(a)
- • no HST on bringing into participating province, X-I-12(a)
- of government entity, defined, 295(1)
- of provincial government, tourist literature, no HST, X-I-12(a)
- of taxpayer, disclosure of information to, 295(6)(b)
- personal, see Personal representative of deceased person

Repurchase of golf club securities, Policy P-098R

Request for extension of time, see Extension of time

Required registration, see Registration (for GST/HST): required

Requirement to provide documents or information, *see* Information: requirement to provide

Research service

- meaning of, Policy P-173
- provided to non-resident
- • made outside Canada, 142(2)(g)
- • zero-rated, VI-V-7, 9; Memo 4-5-3 paras. 51–54

Reserve (Indians), no GST on, see Indians and Indian bands

Residence, see also Residential complex

- in a province
- • association, 132.1(1)(b)

Residence (cont'd)

- • club, 132.1(1)(b)
- • corporation, 132.1(1)(a)
- defined, 132.1
- • organization, 132.1(1)(b)
- • partnership, 132.1(1)(b)
- • permanent establishment in province, 132.1(1)(d)
- • public service body, Info Sheet GI-121
- • unincorporated society, 132.1(1)(b)
- • union, 132.1(1)(c)
- in Canada, see also Non-resident
- advisory services re taking up, zero-rated, VI-V-9; Memo 4-5-3 paras. 51–54; Policy P-173
- • association, 132(1)(b)
- • club, 132(1)(b)
- • corporation, 132(1)(a)
- • defined, 132; Memo 3-4; Memo 4-5-1; Policy P-086R
- • individual, 132(1)(d); Memo 4-5-1; Policy P-086R
- • international shipping corporation, 132(5)
- • labour union, 132(1)(c)
- • organization, 132(1)(b)
- • partnership, 132(1)(b)
- • person with permanent establishment in/outside Canada, 132(2), (3)
- proof of, Memo 3-4 Appendix A; Memo 4-5-1 paras.
 15–18, Appendix A, B; Policy P-009
- • unincorporated society, 132(1)(b)
- • union, 132(1)(c)
- place of, see Place of residence
- primary place of, see Primary place of residence

Residence indicators (for non-resident e-commerce), 211.11

Resident, see also Non-resident; Residence

- liability for tax under Division IV (importation of service and intangible property), 218
- · of a participating province
- • defined, 132.1; Info Sheet GI-121
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 5
- tax on bringing goods from non-HST province, 220.05; TIB B-079, B-XX5
- •• tax on bringing goods from outside Canada, 212.1, 220.06; TIB B-079, B-XX5
- tax on acquisition from unregistered non-resident, 220.06;
 TIB B-079, B-XX5

Residential care facility, Policy P-X11-R (Notice 224); Info Sheet GI-045, *see also* Nursing home

- · defined, Info Sheet GI-050
- election for self-supply rule to apply to pre-Feb26/08 property, 236.4; Info Sheet GI-050
- head lease exempt, V-I-6.11
- landlord's rebate, 256.2; New Harmonized Value-added Tax System Regulations, No. 2, s. 47
- rent exempt, V-I-6
- self-supply rule, 191(3)

Residential care service, *see also* Health care services, exempt; Nursing home

• health care facility providing, V-II-1"health care facility"(c)

- in Ontario, Info Sheet GI-123
- non-profit organization providing, constitutes charity for rebate purposes, 259(1)"charity"

Residential complex, *see also* Condominium; Real property; Residential property

- builder of, defined, 123(1)"builder"
- combined with non-residential portion, 136, 141(5), see also Combined supply
- construction of, where major addition, Memo 19-3-7 paras. 4–9; Policy P-153 (obsolete)
- conversion of commercial property to, 190(1); Memo 19-2-3 paras. 80–84
- deemed not capital property, 195.1(1); Memo 19-2-3 para. 103
- defined, 123(1); Memo 19-2 paras. 15–36; Memo 19-2-1 paras. 8–19, 28; Memo 19-5 paras. 58–62; Policy P-069, P-099, P-104R
- election for self-supply rule to apply to pre-Feb26/08 property, 236 4
- land allowed as part of, Memo 19-5 paras. 58–62; Policy P-069
- land forming part of, sale exempt, V-I-5.2; Memo 19-2-1, para. 44
- land severed from, sale of, Policy P-121
- land sold before completion of, Memo 19-3-7 para. 1; Policy P-083
- laundry machines exempt, V-I-13.3; Memo 19-2-2 paras. 23–24
- major addition to, whether construction of new complex, Memo 19-3-7 paras. 4–9; Policy P-153 (obsolete)
- meaning of hotel, motel, etc., Policy P-099
- mini-home, Memo 19-3-7 paras. 10-16; Policy P-104R
- motor home, Policy P-104R
- multiple unit, see Multiple unit residential complex
- non-profit housing, fair market value of, Policy P-165R
- park model trailer, Memo 19-3-7 paras. 10-16; Policy P-104R
- parking space incidental to, exempt, V-I-8.1(a); Memo 19-2-2 para. 18
- percentage of completion of, Policy P-087
- relocation from existing land, Memo 19-2-4 paras. 11–18; Policy P-154
- return by purchaser to vendor, election to be taxable, V-I-2(b)
- sale of, Memo 19-2-1
- by builder, where tax already paid, exempt, V-I-3, 4, 5; Memo 19-2-1 paras. 29–39
- • by non-resident, not required to collect tax, 221(2)
- • farmland, exempt, V-I-10, V-I-11, V-I-12
- • incorrect statement re, 194
- other than by builder, exempt, V-I-2; Memo 19-2-1 paras. 20–28; Info Sheet GI-004
- • transitional rules, 336
- self-supply rules, 191
- single unit, see Single unit residential complex
- sublease, see Residential sub-lease
- · substantial renovation of, see Renovation: substantial
- timeshare property, Memo 19-2-4 paras. 19–21; Policy P-064 (obsolete)
- travel trailer, Policy P-104R

Residential condominium unit, see also Condominium

 agreement for sale entered into before October 14, 1989, transitional rule, 336(2) Residential condominium unit (cont'd)

- built on leased land, rebate, 254.1(2)(a); Memo 19-3-2 para. 1
- defined, 123(1); Memo 19-2 para. 37
- fees, exempt, V-I-13; Memo 19-2-2 para. 21
- Harmonized sales tax (HST), transitional rules, 351(3), (4); TIB B-077
- new housing rebate, 254(2); Memo 19-3-1
- owner-built, new housing rebate, 256(2)(a); Memo 19-3-4 para.
- Ontario rebate, New Harmonized Value-added Tax System Regulations, No. 2, s. 46
- sale before condominium is registered, 168(5)(a)
- sale by builder where tax already paid, exempt, V-I-4; Memo 19-2-1 paras. 32–37
- self-supply rules, 191(1), (2)

Residential property, *see also* Real property; Residential complex

- combined with non-residential property, 136(2), (3), 141(5), see also Combined supply
- land for mobile home, rent exempt, V-I-7; Memo 19-2-2 para.
 14
- lease to person making exempt leases, exempt, V-I-6.1; Memo 19-2-2 para. 12
- allocation of payments to lease intervals, 136.1(1); Memo 19-2-2 para. 13
- • rebate to lessor, 256.1; Memo 19-3-5
- transfer of possession of residential complex attributed to builder, 191(10)
- new housing rebate, see New housing rebate
- rent exempt, V-I-6; Memo 19-2-2 paras. 1-11
- self-supply rules, 191
- timeshare, Memo 19-2-4 paras. 19-21; Policy P-064 (obsolete)

Residential rental property rebate, see Landlord's rebate

Residential sub-lease

- allocation of payments to lease intervals, 136.1(1); Memo 19-2-2 para. 13
- exemption for lease of land, V-I-6.1; Memo 19-2-2 para. 12
- exemption for lease of residential complex, V-I-6.1(b), (c); Memo 19-2-2 para. 12
- rebate to lessor, 256.1; Memo 19-3-5
- transfer of possession of residential complex attributed to builder, 191(10)

Residential trailer park

- conversion of land for use as, tax payable, 190(4); Memo 19-2-3 paras. 59-63
- defined, 123(1); Memo 19-2 paras. 38–40; Memo 19-5 paras. 43–44; Policy P-088
- exemption for lease of site, V-I-7(b); Memo 19-2-2 para. 16
- first use of, tax on, 190(4)
- · increase in size
- • first use of additional area, 190(5); Memo 19-2-3 paras. 61–63
- sale of additional land deemed separate supply, 136(4); Memo 19-5 paras. 45–54
- lease of, exempt, V-I-7(b); Memo 19-2-2 para. 16
- sale of, exempt, V-I-5.3; Memo 19-2-1 paras. 45-46
- self-supply rules, 190(4)–(5); Memo 19-2-3 paras. 59–63
- single sites in, sale of taxable, Policy P-088

 supplied together with other real property, deemed separate supply, 136(2)(a)(iii)

Residential unit, see also Residential complex; Residential condominium unit

- affixed to land, lease of land exempt, V-I-7; Memo 19-2-2 para, 14
- defined, 123(1); Memo 19-2 paras. 15–18, 41–44; Policy P-099
- • meaning of hotel, motel, etc., Policy P-099
- mini-home, Memo 19-3-7 paras. 10-16; Policy P-104R
- motor home, Policy P-104R
- park model trailer, Memo 19-3-7 paras. 10-16; Policy P-104R
- parking space incidental to, exempt, V-I-8; Memo 19-2-1 paras. 47–48
- travel trailer, Policy P-104R

Residential use, conversion of property to, 190

Residual input (for ITC allocation of financial institution)

- allocation of, 141.02(7)–(9)
- defined, 141.02(1)

Resources, *see* Continuous transmission commodity; Exploration or exploitation of minerals; Natural resource

Respect of, see In respect of property situated in Canada

Respiratory monitors, zero-rated as medical devices, VI-II-5.2; Memo 4-2 para. 10

Respite care

• exempt, V-IV-3

Restaurant

- meals at, in health care facility not exempt, V-II-1"institutional health care service"(g)
- supplies of food taxable, VI-III-1(q); Memo 4-3 paras. 136–139; Policy P-251

Restocking charges

• adjustment of GST, 232; Memo 12-2

Restoration

• medical device, of, zero-rated, VI-II-34; Memo 4-2 para. 62

Retail establishment

 defined, Streamlined Accounting (GST/HST) Regulations ss. 2(1), 19(1)

Retail sales tax, see Provinces and provincial law: taxes of

Retailers

- cash register calculation of GST, TIB B-003
- Quick Method or streamlined accounting, 227(1); Streamlined Accounting (GST/HST) Regulations; TIB B-028

Retention of records, see Books and records

Retention of refund or rebate, see Set-off

Retirement compensation arrangement

- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(xiii)
- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)
- financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 35

Retirement income fund, see Registered retirement income fund

Retirement savings plan, see Registered retirement savings plan

Retransfer of property on return of security, deemed not to be a supply, 134; Policy P-115, P-120, P-122

Retroactivity

- designation of determination of municipality, Policy P-204 (obsolete)
- legislation
- effect of, S.C. 1993, c. 27, s. 210 (reproduced before s. 122)
- federal sales tax inventory rebates, 120(1)"inventory", 120(2.1)
- • input tax credit allocation, 141.01
- • interest applicable, 124(3), (4)
- registration, 241(1)
- regulations, 277(2)(d)

Return, Memo 500-2, 500-2-6, *see also* Offences; Payment; Penalties; Remittance; Reporting period

- amended, Policy P-149R
- consolidated filing for investment plans, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 54; Notice 260
- deadline, 238(1)
- demand for, 282, 283
- election for filing by manager of investment plan, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 53; Notice 260
- election to be taxable, V-I-2(b)
- electronic filing, see Electronic filing
- evidence as to when filed, 335(4)
- evidence as to whether filed, 335(3), (13)
- extension of time for filing, 281; Memo 16-2 paras. 39, 40(d)
- false statement in, penalty, 285
- · filing frequency, see Reporting period
- forms, GST 34E, GST 62
- · goods, see Returned goods
- how to complete, Memo 500-2-4
- interim, selected LFI, 238(2.1)(a); TIB B-083R
- joint filing, 228(7)
- late filing penalty, 280.1; TIB B-100; Memo 16-2 paras. 25-26
- net tax refunds not payable until all filed, 229(2); TIB B-100
- place of filing, 278(1)
- proof of, 335(12)–(14)
- rebates not payable until all filed, 263.02; TIB B-100
- required
- • before net tax refund will be paid, 229(2); TIB B-100
- before overpaid instalments will be refunded, 230(2); TIB B-100
- • before rebate will be paid, 263.02; TIB B-100
- before refund will be paid on assessment, 296(7); TIB B-100
- before refund or rebate will be paid to bankrupt, 225(6), 263.1; Policy P-162
- • demand for, 282, 283
- • Division IV.1 (self-assessed HST), 220.09; TIB B-XX5
- • for Division II (goods and services tax), 238
- • exception for seasonal or inactive business, 238.1; TIB B-072

- for Division IV (importation of services and intangible property), 219
- • non-resident performer, 238(3); Policy P-134R
- · · selected listed financial institution
- • interim, 238(2.1)(a); TIB B-083R
- • final, 238(2.1)(b); TIB B-083R
- separate, for branches or divisions, 239, 259(10), (11); Memo
- simplification of, TIB B-072
- unincorporated bodies, who must file, 324
- · when filing required, 238

Returnable container charge

• defined, 226(1)

Returnable containers, 226, see also Containers and coverings

- defined, 226(1)
- post-April 2002 rules, 226; Finance news release 2002-014
- • basic tax content of beverage, 226(17)
- • deemed consideration for container, 226(2), (3)
- • election for nil consideration, 226(14), (15)
- • empty container, consideration deemed nil, 226(4)
- • exceptions, 226(5)
- • fair market value of beverage, 226(16)
- Nova Scotia, New Brunswick and Newfoundland, special rules, 226(8)–(12)
- • rebate, amount deemed paid, 263.2
- • recycling, 226(6), (7)
- • sale of business, 226(13)–(15)
- • specified beverage retailer
- • addition to net tax, 266(18)
- • defined, 226(1)
- • election not to deduct returnable container charge, 226(3), 226(9)(b)

Returned commission

• application of Division IV tax on financial institutions, 217"qualifying consideration"B(c)

Returned goods

- credit note or debit note, 232(3); Memo 12-2
- imported on consignment, rebate, 215.1(2)–(3)

Returning residents' purchases

- no GST on importation, VII-1
- no HST on bringing into participating province, X-I-9
- imported, no GST, VII-9

Reusable containers

• brought into an HST province, no HST, X-I-8(d), X-I-16

Revenue Canada, see Canada Revenue Agency

Revenue Canada, Taxation

- administration of employee/partner rebate, 253(5)
- merging of administration with GST, 123(1)"Agency" (Analysis); Revenue Canada news release 92-53

Reverse collection of tax

- emissions allowance, 221(2.1), 228(4)
- real property, 221(2), 228(4)

Revised application

• defined, Offset of Taxes (GST/HST) Regulations s. 2

Revocation, see also Cancellation; Election (that can be made)

- · by Minister
- · · of alternate collection method
- ••• for direct seller, 178.2(6); Memo 14-1 para. 22
- • for distributor, 178.2(7); Memo 14-1 para. 23
- • of approval for branches of public service body to be separate person for small supplier status, 129(4), (5)
- of approval for unincorporated organizations to be branches of each other, 130(3), (4)
- • of authorization for branches to file separate returns, 239(3), (4)
- • of authorization to use export certificate, 221.1(5)–(6)
- • of authorization to use export distribution centre certificate, 273.1(10), (11)
- • of designation as buyer, 178.6(4)
- of designation of charity employing/training disabled persons, 178.7(4)
- • of network seller approval, 178(11)–(17)
- • amount payable in lieu of interest, 236.5
- of election
- • by billing agent to account for tax, 177(1.12)
- • by charity not to use simplified accounting, 225.1(9); Info Sheet GI-066
- • by public service body re capital real property, 211(4), (5)
- for exempt supplies within corporate group, 150(4)(c), 150(4.1); Policy P-025, P-044
- • for fiscal year to be calendar year or taxation year, 244(3), (4)
- • for joint ventures, 273(3), (4)
- • for non-application of patronage dividends, 233(5)
- • for streamlined accounting, 227(3)(b), 227(4)–(4.2)
- • HST transitional year, 363.2; New Harmonized Valueadded Tax System Regulations s. 58
- • for supplies at nil consideration within corporate group, 156(3)(c); Memo 14-5 paras. 42–53
- for tax on sale of land sold in adventure in the nature of trade, Policy P-073
- of waiver, 298(8), see also Waiver

Rheas

- feed for, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(2.1)
- zero-rated, VI-IV-1; Policy P-040 (obsolete); Memo 4-4 para.

Rice, wild, see Water: products grown in

Rice Krispie squares, taxable, VI-III-1(m); Memo 4-3 para. 93 Ride-sharing service

• treated as taxi, 123(1)"taxi business"; Info Sheet GI-196

Right

- granted with share, entitling access to facilities, constitutes membership, 123(1)"membership"
- · of a provincial gaming authority
- • defined, Games of Chance (GST/HST) Regulations s. 5(1)
- · of supplier to sue for tax remitted, 224
- to be a spectator at amateur event, exempt, V-VI-11
- to enter government property, supply of taxed, 146(e), V-VI-20(1)

- to explore for, exploit, take or remove minerals, see Mineral; Natural resource
- to hunt or fish, see Fishing; Hunting licence
- to library borrowing privileges, exempt, V-VI-19
- to membership services, whether membership dues exempt, V-VI-17
- to play or participate in a game of chance, see Bets; Game of chance
- to rebate, assignment of, see Assignment
- to refund of income tax, see Income tax refund discounter
- to use a campground or trailer park, 163(3)"tour package"
- to use intellectual property, supplied to non-resident, zerorated, VI-V-10; Memo 4-5-3 para. 106
- used in business in Canada, 217"imported taxable supply"(c.1)
- to use real property, constitutes supply of real property, 136(1)
- to use road or bridge, exempt, V-VIII-2

Risks insured outside Canada, zero-rated, VI-IX-2

Riverfront case overruled, V-II-1.2

Road

- access construction, exempt, V-VI-21.1(e)
- barriers, installing, replacing, repairing or removing, exempt, V-VI-21.1(a)
- clearing services, taxable, Memo 4-4 para. 3
- ferrying by water between stretches of, V-VIII-1, VI-VII-14; Memo 28-1
- lights, installing, replacing, repairing or removing, exempt, V-VI-21.1(a)
- maintenance of, joint venture election, *Joint Venture* (GST/HST) Regulations s. 3(1)(k)
- repair or maintenance, exempt, V-VI-21.1(d)
- signs, installing, replacing, repairing or removing, exempt, V-VI-21.1(a)
- tolls, exempt, V-VIII-2; Memo 28-1 paras. 53-64

Rock, taxable, Memo 4-4 para. 2

Rodeo, see Place of amusement

Rolling stock (railway), see Railway: equipment and rolling stock

Rollover

- amalgamation, 271
- butterfly, 156(1)"temporary member"; Memo 14-5 paras.
- calculation of GST, see Consideration
- death, 167(2), 267(a); Memo 14-4 paras. 29-32
- divisive reorganization, 156(1)"temporary member"; Memo 14-5 paras. 14-16
- foreign bank subsidiary to branch, 167.11
- partnership to new partnership, 272.1(7)
- sale of business, 167(1), (1.1); Memo 14-4
- shares, no tax on transfer, 123(1)"financial instrument"(b), 123(1)"financial service"(d)
- transfer to or from a trust, 268, 269
- windup of subsidiary, 272

Rolls

- bread, zero-rated, VI-III-1(m); Memo 4-3 para. 94
- fruit, taxable, VI-III-1(1); Memo 4-3 paras. 85-86

Room, see Hotel; Rent

Rough justice rule

- property primarily for use in commercial activities, 199(2)(b)
- property primarily not for use in commercial activities, 199(2)(a)

Rounding of prices to eliminate pennies, Info Sheet GI-131

Rowhouse unit

- as part of residential complex, 123(1)"residential complex"(b)(i)
- constitutes residential unit, 123(1)"residential unit"

Royal Canadian Legion

- hall, food at taxable, VI-III-1(q), Memo 4-3 para. 138
- purchase of poppy or wreath, rebate, 259.2
- · supply of poppy or wreath exempt, V-VI-27

Royal Canadian Mounted Police, see also Police

- communication of information to permitted, 295(5)(c)(i)
- officer may lay information or complaint, 332(1), see also Offences

Royalties, see also Lease (or license); Rent

• natural resource, see Mineral; Natural resource

Rulings, by CRA, Memo 1-4

Rural municipality, see Municipality

S

SAM, see Special attribution method

SCR, see Specified Canadian recipient

SDP, see Specified distribution platform

SLFI, see Selected listed financial institution

SQE, see Selected qualifying employer

SQM, see Special Quick Method

Safekeeping, see Custodial service

Safety deposit box, rental taxable, TIB B-033

St. Pierre, air travel to not zero-rated, VI-VII-1(1) "taxation area", VI-VII-3(a); Memo 28-3 para. 18

Salads, prepared

- gelatin, Memo 4-3 para. 108
- taxable, VI-III-1(o.1); Memo 4-3 paras. 104-109

Salary

 deemed, for SLFI financial-institution percentage rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 21, 22(4), 23(5), 25(5)

Sale, see also Supply; Taxable supply

- · account receivable, of
- • exempt, 123(1)"financial instrument"(a), 123(1)"financial service"(d); Memo 17-1 para. 6
- purchaser not liable for GST when account collected, 222.1(b)
- • vendor deemed to have collected GST, 222.1(a)
- aircraft, of, 203(3)
- approval, on, see Consignment sale
- automobile, of, 203(1), (3), (4); Memo 8-2 para. 32
- business, of, 167(1), (1.1); Memo 14-4
- • allocation of consideration among supplies, 167(1)(a)
- • election for no GST, 167(1)(b), 167(1.1); Memo 14-4

- • financial institution, by, 149(3); Policy P-021
- • financial institution, to, 205(4), (5)
- • inclusion of accounts receivable, Policy P-013
- liability of purchaser for vendor's unremitted tax, Policy P-012R
- • returnable containers in, 226(13)–(15)
- · capital property, see Capital property
- consignment, see Consignment sale
- constitutes supply, 123(1)"supply"
- defined, 123(1); Memo 19-1 paras. 12–24; Memo 19-2-3 paras. 16–23; Policy P-111R, P-164
- distinguished from construction contract, Memo 19-1 paras.
 92_97
- fund-raising purposes, exempt, V-VI-4
- land related to (severed from) residential complex, Policy P-121
- leaseback agreement, determining consideration, 153(4.1)–(4.6)
- new housing, see New housing rebate
- · of goods, repeal of FST, 118
- -or-return, see Consignment sale
- parking space with condominium unit, exempt, V-I-8; Memo 19-2-1 paras. 47-48
- passenger vehicle, of, 203(1), (3), (4); Memo 8-2 para. 32
- personal property, transitional rules, 337, see also Personal property
- power of, sale under deemed to be seizure, 183(10); Policy P-226
- property acquired by insurer in settlement of claim, 184(6)
- real property, additional credit, 193(1), (2), 257; Memo 19-2-3 paras. 102, Appendix; Memo 19-3-6, see also Real property: sale of
- rent to own, agreement, Policy P-164
- seized or repossessed property, 183(2), 183(7); Policy P-156R, P-175
- used goods, 176; Memo 400-3-6; TIB B-084

Sale-leaseback agreement, determining consideration, 153(4)

Sale-or-return, see Consignment sale

Sales agent, see Sales representative

Sales aid

- defined, for direct seller rules, 178.1; Memo 1-5
- defined, for network seller rules, 178(1); Info Sheet GI-052
- sale of, Info Sheet GI-023

Sales representative

- · network seller rules
- • cancellation of GST registration, 242(2.3)
- • defined, 178(1)
- • joint election with network seller, 178(4)
- services to non-resident zero-rated, VI-V-5; Memo 4-5-3 paras. 23, 37–38, 90, 92
- whether acts as agent, Policy P-016

Sales suppression software, see Zapper software (or hardware)

Sales tax

- defined, for FST inventory rebate, 120(1)
- estimated, for FST new housing rebate, see Estimated federal sales tax
- federal, see Federal Sales Tax (FST)
- provincial, see Provinces and provincial law: sales tax

Sales tax (cont'd)

• rebate, see Federal Sales Tax (FST): inventory rebate

Sales tax harmonization agreement

• defined, 123(1)

Salesperson of financial instruments

• constitutes listed financial institution, 149(1)(a)(iii)

Salt, whether zero-rated, Memo 4-3 paras. 140–142

Salted

- fish, zero-rated, VI-III-1, VI-IV-8; Memo 4-4 para. 34; Info Sheet GI-049
- nuts, taxable, VI-III-1(g); Memo 4-3 para. 60; Info Sheet GI-021
- seeds, taxable, VI-III-1(g); Memo 4-3 para. 60; Info Sheet GI-021

Same class or kind

• meaning of, Policy P-221

Same-sex partner, see Common-law partner

Samples (direct seller rules), see Sales aid

Sand, constitutes mineral, 123(1)"mineral"

Sandwiches, prepared

• taxable, VI-III-1(0.2); Memo 4-3 paras. 110-113

Sanitary napkins, see Feminine hygiene product

Sapphires, see Jewellery

Saskatchewan, see also Provinces and provincial law

- Indian lands treated as reserves, Treaty Land Entitlement (Saskatchewan) Remission Order
- provincial government entities that pay no GST, 122 (Analysis); Memo 18-2 paras. 26–28

Satellite, see Telecommunications facility

Savings account, operation of, constitutes financial service, 123(1)"financial service"(b)

Scent, see Cosmetic

Schedules [located at end of Excise Tax Act]

- · exempt supplies, Sch. V
- non-taxable importations, Sch. VII
- zero-rated supplies, Sch. VI

School, see also Charity; Public institution; Public sector body; Public service body

- authority, defined, 123(1)"school authority"; Memo 20-1
- board, included as school authority, 123(1)"school authority"; Memo 20-1
- bus services, exempt, V-III-5
- cafeteria
- supplies by, exempt, V-III-12; School Cafeteria Food and Beverage (GST/HST) Regulations; Memo 20-5; TIB B-026
- • supplies to, exempt, V-III-14; Memo 20-5
- constitutes public institution or not, 123(1)"public institution"
- · courses, see Educational services
- excluded from definition of *de minimis* financial institution, 149(4.1)(a)(i); Memo 17-7 para. 5
- exempt supplies, V-III; Memo 20-1, see also Educational services
- food services supplied to, exempt, V-III-14; Memo 20-5

- lease of personal property to student, exempt, V-III-15; Memo 20-1
- mandatory fees, exempt, V-III-7.1
- multiple capacities, apportionment of public service body rebate, 259(4.1), (7), (8)
- non-degree courses, whether exempt, V-III-16
- rebate for printed books, 259.1; Memo 13-4
- rebate of 68% of GST paid, 259(1)"specified percentage"(a), 259(3)(a); TIB B-025; Memo 500-4-3
- rebate of percentage of provincial portion of HST paid, 259(1)"specified provincial percentage", 259(3)(b); *Public Service Body Rebate (GST/HST) Regulations* s. 5(c)(iii)
- student council fees, exempt, V-III-7.1
- student residence, exemption from self-supply rule, 191(6); Memo 19-2-3 para. 49
- tuition fees, exempt, V-III-2; Memo 20-1

Sculpture, see Specified tangible personal property

Sea bed and seas around Canada, constitute Canada, 123(2); Policy P-152R

Search warrant, 290

Seasonal business, temporary cessation of filing, 238.1, TIB B-072

Seasonings, zero-rated as food, VI-III-1; Memo 4-3 para. 1

Seaweed, see Water: products grown in

Second language instruction, English or French, exempt, V-III-11; Memo 20-7

Second variant year

• defined, 236.5(1)(b)

Secondary school, see Educational services; School: authority

Secrec

- · CRA officials, 295
- solicitor-client privilege, 293

Secretary (officer of corporation or association), see also Officer

- authorized to sign documents, 279(a)
- liable to pay or remit tax for unincorporated body, 324

Section 325 avoidance planning

- defined, 285.03(1)
- penalty for, 285.03(2)

Section 325 avoidance transaction

• defined, 285.03(1)

Secured creditor, see also Security interest

- defined
- for election for nil consideration, 156(1)
- for garnishment rules, 123(1)
- garnishment of payment to, 317(3)
- interference with remittance of tax, 323.1 (draft)
- · overridden by Revenu Canada
- • garnishment, 317(3)
- • tax collected and held in trust, 222(3)

Securities

- · certificates, importation
- • no GST on importation, VII-10
- • no HST on bringing into participating province, X-I-17

Securities (cont'd)

- commission, filing fees, exempt, V-VI-20(g)
- custodial or nominee services in respect of, see Custodial service
- · dealer or trader
- • constitutes listed financial institution, 149(1)(a)(iii)
- • required to provide information to investment plan, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 52(8)
- golf club, Policy P-098R

Security

- by CRA over GST collected, 222(3), (4); Security Interest (GST/HST) Regulations
- defined, Interpretation Act s. 35(1)
- · for payment of tax
- • by non-resident, 240(6); Memo 2-6; Policy P-201
- • extends 10-year collection limitation period, 313(2.6)(b)
- • generally, 314
- • on importation of goods, 213.1
- retained out of any refund or rebate, 240(7)
- substituted for other security, 134; Policy P-115

Security interest

- assignment of, to third party, not a supply, 134; Policy P-122
- defined
- • for election for nil consideration, 156(1)
- • for garnishment rules, 123(1)
- · overridden by CRA
- • garnishment, 317(3)
- • tax collected and held in trust, 222(3)
- transfer of, deemed not to be a supply, 134; Policy P-115, P-120, P-122

Seeders and planters, zero-rated, VI-IV-10, Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(d); Memo 4.4 Schedule

Seeds

- coated with candy, chocolate, etc., taxable, VI-III-1(e); Memo 4-3 paras. 45–54
- evergreen, zero-rated, Policy P-240
- flax seed, zero-rated, VI-IV-3; Memo 4-4 para. 15
- flower, taxable, Memo 4-4 para. 11
- forage mixture, zero-rated, Memo 4-4 para. 13
- lawn, taxable, Memo 4-4 para. 11
- list of, Memo 4-4 Appendix; Info Sheet GI-107
- natural, whether zero-rated, VI-IV-2, Memo 4-4 paras. 9–16; Info Sheet GI-107
- pet food, not zero-rated, VI-IV-2; Memo 4-4 para. 9; Info Sheet GI-107
- quantities larger than ordinarily sold to consumers, Memo 4-4 para. 10
- salted, taxable, VI-III-1(g); Memo 4-3 para. 60; Info Sheet GI-021
- seed potatoes, zero-rated, Memo 4-4 para. 12
- snack mixtures, taxable, VI-III-1(i); Memo 4-3 paras. 66-70
- wild bird feed, not zero-rated, VI-IV-2; Memo 4-4 para. 9; Info Sheet GI-107

Seeing-eye dog, *see* Guide dog, supply of and training individual to use

Segregated fund, see also Distributed investment plan

Segregated fund (of an insurer)

- constitutes a listed financial institution, 149(1)(a)(vi)
- · deemed to be a separate person, 131
- defined, 123(1)
- fiscal year of, 244.1
- HST rebates disallowed, 261.4(2)
- rebate for management and administrative services, 261.31(3)
- • deduction to insurer for amount credited, 234(5)

Seismic data

• generation and recording of, joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(o)

Seizure of property

- by credit union, effect of sale on small supplier threshold, Policy P-026
- for non-payment of tax, 321, 322; Memo 500-3-3
- from tax debtor by police, 320
- · GST treatment of property seized, 183
- meaning of, Policy P-102
- notional input tax credit to creditor, 183(7); Policy P-156R
- power of sale, under deemed to be seizure, 183(10); Policy P-226
- solicitor-client privilege claim, 293
- under search warrant, 290(1), (5)

Select Luxury Items Tax Act

 compliance with required before refunds etc. paid, 229(2), 230(2), 238.1(2)(c)(iii), 263.02, 296(7)

Select product

• defined, for network seller rules, 178(1)

Selected investor

- defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 52(1)
- required to provide information to investment plan, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 52(5)–(7)

Selected listed financial institution, TIB B-083R, *see also* Investment plan

- assessment of interim net tax remittance or refund overpayment, 298(1)(b)
- • limitation period, 298(1)(a.1)
- attribution method for HST, see net tax adjustment for HST (below)
- automobile leasing cost, 235(1)B(a)
- central paymaster rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 21
- defined, 123(1), 225.2(1); Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 9–15
- election by corporation in same group as selected LFI, 225.2(4)–(6)
- election to have manager file returns, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 53; Notice 260
- final remittance, 228(2.3)
- final return, 238(2.1)(b)
- group of, required to register if prescribed, 240(1.3), (1.4)
- HST rebate limitations, 261.5
- input tax credits on provincial portion of HST disallowed, 169(3)
- instalment calculation

Selected listed financial institution (cont'd)

- • first fiscal year of being SLFI, 237(5)
- • transitional for 1997, 363(2)
- instalments in transitional HST year, New Harmonized Valueadded Tax System Regulations s. 58.1
- interim remittance, 228(2.1), (2.2); Memo 16-2 paras. 20-24
- interim return, 238(2.1)(a)
- investment plan. special rules and elections, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 47–55
- late remittance, interest, 280(1.1), (4.01); Memo 16-2 paras. 20–24
- net tax adjustment for HST, 225.2(2), (3); Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 16–39
- no self-assessment of HST, 220.04; TIB B-XX5
- partnership with other persons, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 20
- prescribed, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 9–15
- rebates, HST restrictions, 261.5, 263.01
- remittance of HST, 228(2.1)–(2.4)
- • late, interest, 280(1.1), (4.01); Memo 16-2 paras. 20–24
- required to register if prescribed, 240(1.2)–(1.4)
- requirement to register for GST/HST, 225.2(9)(c)
- returns, 238(2.1)
- special attribution method, 225.2

Selected motor vehicle

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)

Selected non-stratified investment plan

• defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 52(1)

Selected person

 defined, for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 31(1)

Selected public service body, 259

- defined, 259(1)
- rebate, 259(3), (4); Public Service Body Rebate (GST/HST) Regulations; TIB B-025
- rebate of provincial portion of HST, 259(3)(b), 259(4)(b), 259(4.3)

Selected qualifying employer

• defined, 172.1(9)

Selected stratified investment plan

• defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 52(1)

Selector control device for disabled person, zero-rated, VI-II-8; Memo 4-2 para. 14

Self-assessment provisions

- drop-shipped goods, 217"imported taxable supply"(b), 219
- emission allowance, purchase of, 228(4)
- importation of services and intangible property, 219
- provincial portion of HST, TIB B-079, B-XX5
- • assessment by CRA, 296(1)(b), 298(1)(d.1)
- • goods brought into participating province, 220.05, 220.07

- • goods purchased from unregistered non-resident, 220.06
- intangible personal property for use in HST province, 220.08
- • service for use in HST province, 220.08
- real property purchased by registrant, 228(4); Memo 19-1 paras. 85-91
- residential property, see Self-Supply rules
- transitional (GST)
- goods or services prepaid from September 1989 through August 1990, 337(6), 340.1
- leases prepaid from September 1989 through August 1990, 340(2), 340.1
- transitional (HST), TIB B-077
- goods prepaid from October 24/96 through January 1997, 352(9), 355
- lease prepaid from October 24/96 through January 1997, 354(2), 355
- services prepaid from October 24/96 through January 1997, 352(10), 355

Self-contained domestic establishment

- defined, 123(1)
- meaning of, Policy P-090

Self-contained residence

• defined, for new residential housing rebate, 256.2(1)

Self-employed person

- home office expenses, ITC limitations, 170(1)(a.1); Memo 8-2 paras. 8-12
- no ITC for cost of residence unless primarily for business, 208(1)

Self-insured benefit arrangement

• Administrative Services Only contract, Policy P-136R

Self-supply rules, *see also* Appropriation of property; Capital property

- conversion of property to capital property, 196.1
- property repairs under insurance claim, Memo 17-16 para. 37; Policy P-014
- real property seized by creditor, 183(4)
- residential property (builder of residential complex uses for self or leases it out), 191; Memo 19-2-3
- • addition to multiple unit residential complex, 191(4)
- communal religious organizations excluded, 191(6.1); Memo 19-2-3 para. 50
- condominium agreement terminated, 191(2); Memo 19-2-3 paras. 33–34
- conversion of property to residential use, 190(1); Memo 19-2-3 paras. 80-84
- deemed in force before 1991, 121(5), V-I-14; Memo 19-2-1 para. 33
- • fair market value determination, Memo 19-2-3 paras. 35-46
- ground leases, 191(3)(b)(i.1), 191(4)(b)(i.1)
- Hutterite colonies excluded, 191(6.1); Memo 19-2-3 para.
- • land for exempt supply or mobile home, 190(3); Memo 19-2-3 paras. 64-67
- land leased and building sold, 191(1)(b)(iii); Memo 19-2-3 paras. 29–32
- • multiple unit residential complex, 191(3)
- • no requirement to file Form 60, 228(4)

Self-supply rules (cont'd)

- • non-profit housing, Policy P-165R
- personal use by builder, exception, 191(5); Memo 19-2-3 paras. 47–48
- • pre-closing occupancy arrangement, exclusion, 191(1)(b)
- remote work site, 191 (7); Memo 19-2-3 paras. 51–58; Policy P-090
- • residential care facility, 191(3), 236.4; Info Sheet GI-050
- residential condominium unit, 191(1), (2); Memo 19-2-3 paras. 33–34
- residential trailer park, 190(4), (5); Memo 19-2-3 paras.
 59-63
- single unit residential complex, 191(1); Memo 19-2-3; Info Sheet GI-005
- • student residence, exception, 191(6); Memo 19-2-3 para. 49
- • subsidized housing, 191.1; Memo 19-2-3 para. 46

Seller, see Supplier

Semi-detached house

- as part of residential complex, 123(1)"residential complex"(b)(i)
- constitutes residential unit, 123(1)"residential unit"

Seminar, see also Place of amusement

- · admission to university or college
- • by charity, exempt, V-V.1-1
- • by public institution, taxable, V-VI-2(m)
- offered by non-resident, see Performing artist: non-resident

Semi-precious stones, articles made of

• excise tax on, I-5(b); Memo 800-1

Sending by mail, see Mail

Sentencing, see Offences

Separate persons

- amalgamated corporation, whether deemed separate from predecessors. 271(a)
- branches of public service bodies, application to be, for small supplier threshold calculation, 129
- segregated fund of insurer, deemed to be, 131
- unincorporated organizations, application not to be, 130

Separate rebate applications for branches or divisions, 261(5)–(6)

Separate returns for branches or divisions, 239, 259(10)–(11)

Separate supplies, deemed, see Supply: separate

Series

- defined
- • for SLFI HST allocation rules, 225.3(1), 225.4(2); Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 1(1), 6(1), 6(2)(a)
- • for tax on supplies brought into a province, *New Harmonized Value-added Tax System Regulations*, *No.* 2, s. 1(1)

Series (of a trust or corporation)

- allocation of expenses to, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 51
- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1)

Series of transactions

• general anti-avoidance rule, 274(3); TIB B-045

Service, see also Supply; Taxable supply

- acquisition for use in HST province, tax on, 220.08; TIB B-079, B-XX5
- exclusions, X-II
- acquisition for use outside HST province, rebate, 261.3; TIB B-080
- administrative, deemed not financial service, Financial Services and Financial Institutions (GST/HST) Regulations s. 4(2)(b)
- constitutes supply, 123(1)"supply"
- · consulting, see Consulting
- contract, see Maintenance contract
- defined, 123(1); TIB B-090; Memo 27-3 para. 13
- expenses incurred in supply of, former 178
- exported, see Exports: services
- freight, see Freight transportation service
- HST on, see Harmonized Sales Tax
- imported, 217-220; Memo 300-9; TIB B-095
- installation, non-resident rebate, 252.41
- municipal, V-VI-21, V-VI-21.1, V-VI-22; Policy P-177R
- ongoing, allocation of consideration to billing period, 136.1(2)
- place of supply
- • GST (whether in/outside Canada), 142(1)(g), 142(2)(g)
- • not affected by subsequent billing periods, 136.1(2)(d)
- • HST, see Place of supply: province
- relating to medical devices, zero-rated, VI-II-18.1, VI-II-34; Memo 4-2 paras. 27, 28, 62
- transit, see Passenger transportation service
- transportation, *see* Freight transportation service; Passenger transportation service
- travel assistance, see Travel: assistance services

Service of documents, 333

Serviced lots

• infrastructure development by municipality for, Policy P-168R

Servings, see Single servings

Set-off

- of government employee's salary against tax owing, 277(1)(f)
- of rebate against tax to be remitted, 228(6)
- of refund or rebate against debts to Her Majesty, 318; Policy P-162
- of refund or rebate against net tax liability, 296(3)
- of refund or rebate against security to be posted by nonresident, 240(7)
- of refund or rebate against tax of another person, 228(7);
 Offset of Taxes (GST/HST) Regulations

Settlement

- insurance claim, subsequent use of property by insurer, 184(3)–(5)
- litigation claim, 182; Policy P-218R
- services, see Clearing and settlement services
- Tax Court appeal, 298(3)(b)

Settlers' effects

- no GST on importation, VII-1
- no HST on bringing into participating province, X-I-9

Settling property on a trust, 268

Settlor

• defined, V-I-9(1)

Several liability, see Joint and several (or solidary) liability

Severance of land

- from residential complex, Policy P-121
- sale taxable, V-I-9(2)(c); Memo 19-5 paras. 11–14

Sewerage system, installation and maintenance by municipality, exempt, V-VI-22

Shake and shingle

 processing facility, joint venture election, Joint Venture (GST/HST) Regulations s. 3(1)(p)

Shampoo

- of hairdresser, no FST inventory rebate, 120(2.1)
- taxable, Memo 4-1 para. 10
- whether cosmetic, VI-II-1"cosmetic" (Analysis)

Share, see also Securities

- certificate
- • no GST on importation, VII-10
- • no HST on bringing into participating province, X-I-17
- constitutes equity security, 123(1)"equity security"
- entitling holder to access to facilities, constitutes membership, 123(1)"membership"
- of cooperative housing corporation, new housing rebate, 255; Memo 19-3-3
- Ontario rebate, New Harmonized Value-added Tax System Regulations, No. 2, s. 45
- of related corporation, ITC on expenses relating to, 186(1), (3); Memo 8-6; Policy P-137

Sharecropping arrangements, rental of farmland zero-rated, VI-IV-9; Memo 4-4 para. 35; Memo 19-5 para. 56; Policy P-253

Shared portion

• of pension rebate amount, defined, 261.01(6)(a)

Shareholder, see also Corporation

- appropriation of property to, 172(2)
- benefit conferred on, 170(1)(c)(iii), 172(2), 173(1); Memo 8-2 para. 20; Memo 9-1, 9-2

Shark cartilage

· not zero-rated, Policy P-240

Sheep, zero-rated, VI-IV-1; Memo 4-4 para. 5

Shells, articles made of

• excise tax on, I-5(b); Memo 800-1

Sheltered workshop, *see also* Certified institution (employing disabled individuals in manufacturing)

Veterans Affairs, supply of poppy or wreath exempt, V-VI-27

Sherbet, in single servings, taxable, VI-III-1(k); Memo 4-3 paras. 74–84

 whether packaged/sold in single servings, Policy P-213; Memo 4-3 paras. 77–84

Sheriff, see Bailiff

Shingles, see Shake and shingle

Ship or boat, see also Carrier; Conveyance

• charter by recreational fisherman, taxable, Memo 4-4 para. 3

- · contract for construction or repair of
- • timing of tax liability, 168(3)(c)(ii)
- export by, evidence of, Memo 4-5-2 Appendix A.2.B
- ferry services, V-VIII-1, VI-VII-13; Memo 28-1
- fishing, zero-rated, VI-IV-1; Agriculture and Fishing Property (GST/HST) Regulations Sch:2(1); Memo 4-4 Schedule; Info Sheet GI-049
- fuel supplied to international carrier, VI-V-2, 2.1; Memo 4-5-2 paras. 21–25; Policy P-006, P-076
- · import of
- valuation, Value of Imported Goods (GST/HST) Regulations s. 4–7; TIB B-031
- • whether taxable, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(f), (h)
- on-board property or service, see On-board charges
- supply to non-resident operating a, zero-rated, VI-V-2; Memo 4-5-2 paras. 21–23; Memo 4-5-3 paras. 27–31; Policy P-076

Shipment, see also Freight transportation service

· drop, see Drop shipment

Shipper

- declaration for zero-rated freight transportation service, Memo 28-2 Appendix
- defined, VI-VII-1(1); Memo 28-2 para. 19
- • gravel pit operators, Policy P-157; Memo 28-2 paras. 54-55
- effect of declaration that property would be exported when it is not, 221(3), (4)
- interline payments from one to another, VI-VII-1(2); Memo 28-2 paras. 44–62; Policy P-157
- international
- • corporation, deemed non-resident, 132(5)
- • freight transportation services zero-rated, VI-VII-6, 7, 11

Shipping charges, see also Carrier; Freight transportation service

- excluded from definition of "commercial service", 123(1)"commercial service"(a); Policy P-151
- excluded from drop-shipment rules, 179(1)(d), 179(5)
- on certain non-GST-taxable importations, VII-3, 5
- on certain non-HST-taxable bringing into HST province, X-I-12, 14

Shoes

• children's, provincial point-of-sale rebate, *see* Children's clothing

Short-term accommodation, see also Accommodation; Hotel

- defined, 123(1); Memo 19-2 paras. 15-18, 45-46; Memo 27-3 paras. 14-17
- non-resident rebate for tour package before 2018, 252.1
- • credited by tour supplier, Memo 27-3
- supplied by charity for relief of poverty, exempt, V-V.1-5.2, V-VI-14
- supplied by public service body, whether exempt, V-V.1-1, V-VI-25(e), (f)

Shov

- fund-raising, charity or political party, V-V.1-2, V-VI-2(m)(iii), V-VI-3, 18
- HST on admission, where sold before October 24/96, 356(5)

Shower seat designed for disabled individual, zero-rated, VI-II-20; Memo 4-2 para. 30

Showing GST on invoices, see Disclosure of tax on invoices

Shredders, zero-rated, VI-IV-10; *Agriculture and Fishing Property (GST/HST) Regulations* Sch:1(1)(g)(iv.2)

Shunting services (trailers)

zero-rated as freight transportation service, Memo 28-2 para.
 23

Sickness insurance

- constitutes insurance policy, 123(1)"insurance policy"(b)
- for non-resident individual, zero-rated, VI-IX-2

Sidewalk

• repair or maintenance, exempt, V-VI-21.1(d)

Signatures on documents, for corporation, association, etc., 279

Signs (road or traffic)

 installing, replacing, repairing or removing, exempt, V-VI-21.1(a)

Silage

- bagger, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(e)(ix); Finance news release 93-039
- zero-rated, VI-IV-2; Memo 4-4 para. 9; Info Sheet GI-107

Silica

• included in definition of mineral, 123(1)"mineral"

Silver, see Precious metal

Simplified

- accounting for charities, 225.1; Info Sheet GI-066
- accounting for returnable beverage containers, 226(3)–(4)
- • ceasing use of, 226(6)
- • commencing use of, 226(7)
- accounting for small businesses, 227; Memo 600, 600-1, 600-4; TIB B-070
- • late filing of election, Policy P-100R
- calculation of input tax credits, for small business, Streamlined Accounting (GST/HST) Regulations ss. 21.1–21.4; TIB B-070
- computation of charity rebate, 259(12)–(14); GST 600, 600-2
- GST returns, TIB B-072

Single consideration, see Combined supply

Single family home, see Single unit residential complex

Single servings

- administrative definition, Memo 4-3 paras. 28–34, 37–38, 42, 77–84, 89, 96–97
- baked goods, fewer than six, taxable, VI-III-1(m), (q)(ii); Memo 4-3 paras. 89, 96–97
- beverages, VI-III-1(n); Memo 4-3 paras. 27-34
- ice cream, frozen yoghurt, etc., taxable, VI-III-1(k); Memo 4-3 paras. 74–84
- pudding, taxable, VI-III-1(n); Memo 4-3 paras. 27-34

Single site in residential trailer park

• sale of taxable, Policy P-088

Single supply

- vs. multiple supply, 123(1)"supply"; Policy P-077R2; Memo 27-3 paras. 20–30
- farm equipment and accessories, Policy P-252; Info Sheet GI-051

Single ticket, see Continuous journey; Passenger transportation service

Single unit residential complex, see also Residential complex

- defined, 123(1), 254(1), 254.1(1), 256(1); New Harmonized Value-added Tax System Regulations, No. 2, s. 41(1); Memo 19-2 paras. 47–48
- includes duplex, for new housing rebate purposes, 254(1), 254.1(1), 256(1); Memo 19-3 para. 7
- major addition to, whether construction of new complex, Memo 19-3-7 paras. 4–9; Policy P-153 (obsolete)
- new housing rebate, 121, 254–256, 256.2, see also New housing rebate
- reacquired by builder after sale, V-I-4(b)
- self-supply by builder, 191(1)
- supply exempt, V-I-2, 3, 4; Memo 19-2-1 paras. 26-39

Site in residential trailer park

• sale of taxable, Policy P-088

Situated in Canada

• meaning of, Policy P-169R

Six or more, packages of, see Single servings

Skin cream, see Cosmetic

Slide show, see Place of amusement

Small business, see also Small supplier

- simplified accounting, 227(1); Memo 600-4; TIB B-070
- simplified input tax credit calculation, 227(4.2); *Streamlined Accounting (GST/HST) Regulations* ss. 21.1–21.4
- transitional credit for, 346, 347; Memo 200-9

Small supplier, 148, 148.1; Memo 2-2, see also Registration (for GST/HST)

- becoming a registrant, 171(1), (2), 251(1); TIB B-041; Policy P-018R, see also Becoming a registrant
- branches or divisions, threshold, Memo 2-4 paras. 7–12
- calculation of threshold, 148(1), (2); Memo 2-2 paras. 17–21
- cancellation of registration on request, 242(2)
- ceasing to be a registrant, 171(3), (4), 251(2)
- charities, \$175,000 gross revenue threshold, 148.1
- credit union, supplies of seized property, Policy P-026
- defined, 123(1), 148, 148.1; Memo 2-2
- inclusion of zero-rated financial services in calculation, Policy P-035
- division, see Small supplier division
- no tax on taxable supplies by (other than real property), 166
- registration not required, 240(1)(a); TIB B-041; Memo 2-1, 2-2
- registration permitted, 240(3); Memo 2-3
- · taxi business, required to register, see Taxi operator

Small supplier division, Memo 2-4 paras. 13-18

- becoming, 129(6), 129(7)
- · change in use rules
- • capital property, 129.1(7)
- • non-capital property, 129.1(4), 129.1(5)
- defined, 129(1)
- designation as, 129(3)
- input tax credits, restrictions, 129.1(2)
- revocation of designation, 129(4), 129(5)
- supply by, 129.1(1)

Smoked fish, zero-rated, VI-III-1, VI-IV-8; Memo 4-4 para. 34; Info Sheet GI-049

Snack foods and snack mixtures

- not exempt in school cafeteria, V-III-12; School Cafeteria Food and Beverages (GST/HST) Regulations s. 3(c); Memo 20-5
- taxable, VI-III-1(f), (i), (l); Memo 4-3 paras. 55–70, 85–86; Policy P-241; Info Sheet GI-021

Snow clearing service, by municipality

exempt, V-VI-21, V-VI-21.1(b); Policy P-177R

Snuff, see Tobacco

Social Insurance Number

• obligation to provide to CRA, 277(1)(d); Social Insurance Number Disclosure Regulations

Social worker

• services exempt, V-II-7.2

Society, see also Unincorporated organization

- constitutes person, 123(1)"person"
- residence in a province, 132.1(1)(b)
- residence in Canada, 132(1)(b)
- service on, 333(1)(c)

Sod, taxable, Memo 4-4 para. 2

Soda

- crackers, VI-III-1(m); Memo 4-3 para. 94
- · drinks, see Carbonated beverages
- fountain, Memo 4-3 para. 18
- water, taxable, VI-III-1(c); Memo 4-3 paras. 17–18

Soft drinks, see also Carbonated beverages

• bottles, see Containers and coverings: returnable containers

Software

- · carrier media
- • valuation of, see valuation of carrier media (below)
- defined, Value of Imported Goods (GST/HST) Regulations s. 2(1)
- importation of, 217"imported taxable supply"(c), TIB B-037R; Policy P-150
- maintenance contracts, TIB B-090
- sales suppression, see Zapper software (or hardware)
- supply to non-resident, VI-V-10; Memo 4-5-3 para. 106
- used in business in Canada, 217"imported taxable supply"(c.1)
- · valuation of carrier media
- • for FST rebate, Federal Sales Tax Inventory Rebate Regulations s. 4(a)B(ii); TIB B-047
- • on importation, 215; Value of Imported Goods (GST/HST) Regulations s. 8; TIB B-031
- zapper, see Zapper software (or hardware)

Software products

• defined, Federal Sales Tax Inventory Rebate Regulations s. 2

Softwood lumber

• export charge, Memo 800-4

Soil or soil mixture

• not zero-rated as fertilizer, VI-IV-5; Memo 4-4 paras. 18, 31

Soil, taxable, Memo 4-4 para. 2

Solar panels

· feeding into electrical grid, Info Sheet GI-122

Solar power

 generation or evaluation of, right to use land deemed not a supply, 162(2)(d)

Sold in single servings

· meaning of, Policy P-213

Soliciting orders for supply by or to non-resident

service zero-rated, VI-V-5; Memo 4-5-3 paras. 23, 37–38, 90, 92

Soliciting orders in Canada

• non-resident, registration, 240(3)(b), (4)

Solicitor, see Lawyer

Solicitor-client privilege, 293, see also Lawyer

Sound, device for converting to light signals for hearingimpaired person, zero-rated, VI-II-7; Memo 4-2 paras. 12,

Sound and light show, see Place of amusement

Special attribution method

• financial institutions, HST calculations, 225.2

Special Import Measures Act

- communication of information relating to, 295(4)(b)
- duties added to base for GST, 215(1)(b)

Special measures for accounting for GST, 227, 259(12)–(14); Memo 600; TIB B-070

Special Quick Method

 calculation for public service bodies, 227(1); Streamlined Accounting (GST/HST) Regulations ss. 19–21; Memo 600-2

Specified amount

- re patronage dividends, see also Patronage dividend
- • defined, 233(1)
- • retroactive reduction in tax base on, when patronage dividend paid, 233(2)
- re transitional credit for small business
- • defined, 346(2), 347(2)
- • to be refunded or rebated to registrant, 346(1), 347(1)

Specified arm's length supply

• defined, for importation of service from foreign branch, 217

Specified beverage retailer

• defined, for returnable containers, 226(1)

Specified business

• defined, for imported supplies between branches, 220(2)(b)

Specified Canadian recipient, *see also* Non-resident ecommerce supplier (e.g., Netflix, AirBNB)

• defined, 211.1(1)

Specified class

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(2)

Specified Crown agent

- capital real property of, 209(2)
- deemed to be prescribed government organization, Public Service Body Rebate (GST/HST) Regulations s. 2.1
- defined, 123(1)
- exclusion from rule re capital property of governments, 200(4)
- joint venture election permitted, 273(1.1)

Specified Crown agent (cont'd)

• prescribed, Streamlined Accounting (GST/HST) Regulations

Specified derivative supply

• defined, for importation of service from foreign branch, 217

Specified distribution platform, *see also* Non-resident ecommerce supplier (e.g., Netflix, AirBNB)

• defined, 211.1(1)

Specified energy

- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)
- • for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 26
- included in "specified property or service" for Ontario/BC HST ITC recapture, New Harmonized Value-added Tax System Regulations, No. 2, s. 28(1)(e)
- • amount of inclusion, New Harmonized Value-added Tax System Regulations, No. 2, s. 31(3)
- exception where used for roadway, New Harmonized Valueadded Tax System Regulations, No. 2, s. 28(2)(a)

Specified extent

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)

Specified facility operator

 defined, Streamlined Accounting (GST/HST) Regulations s. 19(1)

Specified financial service

· defined, for importation of service from foreign branch, 217

Specified gaming machine supply

• defined, 188.1(1)

Specified housing supply

- defined, Electronic Filing and Provision of Information (GST/HST) Regulations s. 1
- election for simplified reporting, Electronic Filing and Provision of Information (GST/HST) Regulations s. 8.1; Notice 294
- penalty for failing to report amount, Electronic Filing and Provision of Information (GST/HST) Regulations ss. 8, 11

Specified importer

defined, 178.8(5)

Specified investor

- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 16(1), 47(1)(a)
- • for investment plan HST rules re non-residents, 225.4(2); Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 6(2)(b), 16(1)

Specified item

• defined, for regulations on interprovincial movements, New Harmonized Value-added Tax System Regulations, No. 2, s. 6

Specified location

- · defined, for HST place of supply rules
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 2

Specified member (of a closely related group)

- defined, 156(1); Memo 14-5 paras. 4-6
- election for nil consideration on supplies between, 156(2)

Specified method (for ITC allocation of financial institution)

• defined, 141.02(1)

Specified motor vehicle, see also Automobile; Motor vehicle

- collection of HST by provincial licensing office, 220.05(2)(a), 220.06(3)(a), 220.07(4)(a), 220.09(2); TIB B-XX5
- collection of tax by provincial motor vehicle offices, Specified Motor Vehicle (GST/HST) Regulations s. 3; TIB B-XX5
- defined, 123(1)
- prescribed value, Specified Motor Vehicle (GST/HST) Regulations s. 2
- registered in a province, place of supply deemed to be in that province, *New Harmonized Value-added Tax System Regulations* s. 33.1; Info Sheet GI-119
- tax on bringing into HST province, TIB B-079, B-XX5
- • exemption from HST, X-I-24
- • from non-HST province, 220.05(1)B(a) [History], 220.05(2)(a)
- • from outside Canada, 220.07(1)(a), 220.07(3)(a)
- • from unregistered non-resident, 220.06(1)B(a), 220.06(3)(a)

Specified non-arm's length supply

• defined, for importation of service from foreign branch, 217

Specified non-resident supplier, *see also* Non-resident ecommerce supplier (e.g., Netflix, AirBNB)

• defined, 211.1(1)

Specified number of remaining lease payments

• defined, 153(4.2)

Specified number (of residential complexes required to be reported)

- defined, Electronic Filing and Provision of Information (GST/HST) Regulations s. 12
- penalty for failure to report, *Electronic Filing and Provision of Information (GST/HST) Regulations* s. 13

Specified parking area

- defined, V-VI-1
- exemption for hospital parking, V-V.1-7, V-VI-25.1

Specified partnership

- closely related to other partnership or corporation, 156(1.1)
- for closely related corporations election, defined, 156(1)
- for selected listed financial institutions, 225.2(8) [repealed see Qualifying partnership]

Specified pension entity

- defined, for pension plan expenses, 172.1(1)
- election by, 172.1(4); Notice 281

Specified percentage

- · for public service body rebate
- • defined, 259(1)
- • rebate of, 259(3)(a), 259(4)(a)
- for selected listed financial institutions
- defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 44

Specified person

- defined
- • for disclosure on notices of objection, 301(1)

Specified person (cont'd)

- • for imported supplies between branches, 220(2)(a)
- • for printed books rebate, 259.1; Federal Book Rebate (GST/HST) Regulations; Memo 13-4
- • for two-year input tax credit limitation, 225(4.1)

Specified pre-implementation date

· defined, 348

Specified production energy

- defined, for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 31(1)
- excluded from specified energy, New Harmonized Value-added Tax System Regulations, No. 2, s. 31(3)

Specified professional

· defined, for approving medical devices, VI-II-1

Specified property, see also Specified property or service

- · re certified institution rules
- • defined, 230.2(1), III-XIV-1
- · re federal sales tax
- defined, for transitional rule re prepaid supplies to consumers, 337(8)
- tax where consideration due or paid before September 1990, 337(7)
- · re printed books rebate
- • defined, 259.1(1)
- · re Quick Method
- defined, Streamlined Accounting (GST/HST) Regulations s. 15(1)
- · re streamlined accounting methods
- defined, Streamlined Accounting (GST/HST) Regulations ss. 15(1), 19(1)

Specified property or service

- · defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)
- for Ontario/BC ITC recapture rules, 236.01(1); New Harmonized Value-added Tax System Regulations, No. 2, s.

Specified provincial input tax credit

- defined, for Ontario/BC ITC recapture rules, 236.01(1); New Harmonized Value-added Tax System Regulations, No. 2, s. 29
- recapture of, 236.01(2)

Specified provincial percentage

- defined, 259(1); Public Service Body Rebate (GST/HST) Regulations s. 5(c)
- rebate of, 259(3)(b), 259(4)(b), 259(4.3)(e)(ii)

Specified provincial tax

· defined, Specified Motor Vehicle (GST/HST) Regulations s. 1

Specified recipient, *see also* Non-resident e-commerce supplier (e.g., Netflix, AirBNB)

• defined, 211.22(1)

Specified registrant

• defined, *Streamlined Accounting (GST/HST) Regulations* s. 15(1)

Specified research energy

- defined, for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 31(1)
- excluded from specified energy, New Harmonized Value-added Tax System Regulations, No. 2, s. 31(3)

Specified resource

- defined
- for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1)
- • for pension plan deemed-supply rules, 172.1(1)

Specified return

 defined, Electronic Filing and Provision of Information (GST/HST) Regulations s. 1

Specified salary and wages

- · defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)
- • for Ontario/BC ITC recapture rules, New Harmonized Value-added Tax System Regulations, No. 2, s. 31(1)
- excluded from specified energy, New Harmonized Value-added Tax System Regulations, No. 2, s. 31(3)

Specified service

- for HST management services rebate
- • defined, 261.31(1)
- rebate of provincial portion of HST, 261.31(2); New Harmonized Value-added Tax System Regulations, No. 2, s. 21.1
- · of designated charity
- • defined, 178.7(1)
- • taxable, V-V.1-1(d.1)

Specified share

• defined, Closely Related Corporations Regulations s. 2

Specified supply

- · charities
- calculation of net tax for charities on, 225.1(2)A(a), 225.1(2)B(b)
- defined, 225.1(1); Streamlined Accounting (GST/HST) Regulations s. 15(1), 19(1)
- · importations
- • defined, 178.8(1)
- non-resident e-commerce
- • defined, 211.1(1)
- · registered pension plan
- • defined, 172.1(1)

Specified tangible personal property, Memo 400-3-6

- defined, 123(1)
- importation of, whether taxable, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(g)
- prescribed amounts in respect of, Specified Tangible Personal Property (GST/HST) Regulations; TIB B-027
- seized or repossessed, 183(5)–(6)
- used
- • defined, 123(1)"used tangible personal property"

Specified tax rate

• defined, Taxes, Duties and Fees (GST/HST) Regulations s. 2(1)

Specified time

 defined, for temporary recapture of ITC for large businesses, New Harmonized Value-added Tax System Regulations, No. 2 s. 26

Specified total revenue

• defined, for export distribution centres, 273.1(1)

Specified transaction

• defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 16(1)

Specified year

- · defined
- • for importation of service from foreign branch, 217
- for SLFIs, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)

Speech

- impairment, communication device for telephone, VI-II-2; Memo 4-2 para. 1
- · therapy services
- • exemption for, V-II-7(h)
- • practitioner of, V-II-1"practitioner"

Speech-language pathologist

- constitutes practitioner, V-II-1"practitioner"
- services exempt, V-II-7(h)

Sperm, human, zero-rated, VI-I-5; Memo 4-1 para. 15

Spices, zero-rated, VI-III-1

Spinal brace, zero-rated, VI-II-23; Memo 4-2 para. 39

Spirits, see Alcoholic beverages

Splint

• zero-rated as medical device, VI-II-23; Memo 4-2 para. 39

Sponsor (of convention), Memo 27-2

- defined, 123(1); Policy P-095; Memo 1-5; Memo 27-2 paras. 28-36
- determination of percentage of non-resident attendees, Policy P-095; Memo 27-2 para. 32
- foreign convention, rebate of tax paid, 252.4(1); Info Sheet GI-029; Memo 27-2 paras. 55-63
- rebate credited by organizer, 252.4(2); Memo 27-2 paras.
 72–93; Info Sheet GI-031
- supply by, to non-resident, non-taxable, 167.2, 189.2; Memo 27-2 paras. 48–54, 98–105

Sponsorship of public service or non-profit activities

• when deemed not to be a supply, 135

Sports, see Club; Recreation

Spouse, see also Common-law partner

- Canadian diplomat or Canadian Forces member, deemed resident in Canada, 132(1)(d)
- former, defined to include former common-law spouse, 123(1)
- · transfer of property to
- • farmland, for estate planning purposes, Policy P-109
- • joint liability for transferor's tax, 325

Squabs

• zero-rated, VI-IV-1; Memo 4-4 para. 5

Squatter's rights

• transfer of real property to resolve, Policy P-178

Stamps

- for philatelic value, see Specified tangible personal property
- · for postal use, see Mail

Standardized accounting (within CRA), TIB B-100; Info Sheet GI-024

Standards testing by government bodies, taxable, 146(a), V-VI-21

Standing frame (Standing equipment), see Prone boards

Standing therapy

• device for, zero-rated, VI-II-41

Startup costs, eligible for input tax credits, 141.1(3); Policy P-019R

Startup credit, see Transitional Rules (GST): transitional credit for small businesses

Stated price net of rebate transferred to builder

- GST, Memo 19-3-1-1, 19-3-1-2
- HST (British Columbia), Info Sheets GI-086, GI-130
- HST (NB, NL), Info Sheet GI-191
- HST (Ontario), Info Sheet GI-085
- HST (PEI), Info Sheets GI-147, GI-148

Statement as to use of real property

• effect of incorrect statement that sale is exempt, 194

Statement of account

- constitutes invoice, 123(1)"invoice"
- constitutes record, 123(1)"record"

Statistics Act

 disclosure of information by official in accordance with, 295(5)(m)

Status

• defined, Input Tax Credit Information (GST/HST) Regulations

Stay of proceedings

• while prosecution underway, 327(4)

Steam, see Continuous supply (electricity, gas, etc.)

Stevedoring

 zero-rated as freight transportation service, Memo 28-2 paras. 24–25

Stock, see Corporation; Share

Stockbroker, see Investment dealer

Stockings

 surgical support or anti-embolic, zero-rated as medical device, VI-II-35; Memo 4-2 para. 51

Stones

- · semi-precious, articles made of
- • excise tax on, I-5(b); Memo 800-1
- taxable, Memo 4-4 para. 2

Stop International Tax Evasion Program, *see* Informant payments (for leads on international tax evasion)

Stop-loss

 coverage by insurer for self-insured benefit arrangement, Policy P-136R

Stopover

defined

Stopover (cont'd)

- • GST (zero-rated transportation), VI-VII-1(1); Memo 28-3 paras. 12–17
- HST (province of supply of transportation), New Harmonized Value-added Tax System Regulations ss. 21–22; Memo 28-3 paras. 12–17
- effect on zero-rating for international travel, VI-VII-2, 3; Memo 28-3 paras. 39–41

Storage

- goods passing through HST province, 220.03; TIB B-XX5
- goods removed from HST province after paying HST, rebate, 261.1(2); TIB B-080

Storage charges

- cargo container for non-resident, zero-rated, VI-V-6.2; Memo 4-5-3 paras. 44-45
- excluded from drop-shipment rules, 179(1)(d), 179(5)
- natural gas to be exported, zero-rated, VI-V-15.3; Policy P-074
- whether part of cost of recovering property, Policy P-175

Storing goods, see Storage charges

Stove, see Appliance: kitchen

Straddle plant

- defined, 123(1)
- exchange of gas at, no GST, 153(6)
- recovery of gas at, VI-V-15(c), VI-V-15.1(a)(iii)(B), VI-V-15.3(c)(ii)(B)

Straddling transactions, see Transitional Rules

Stratified investment plan, see also Investment plan

- allocation of expenses to a series, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 51
- application to use particular methods for SLFI percentages, 225.3
- defined, for SLFI HST allocation rules, 225.3(1), 225.4(2);
 Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 1(1), 6(1), 6(2)(a); New Harmonized Value-added Tax System Regulations, No. 2, s. 1
- election for real-time calculation, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 49(1)
- election to have 225.4(3) not apply, 225.4(6)
- financial institution's percentage, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 29, 30, 33

Straw, zero-rated, VI-IV-3; Memo 4-4 para. 15

Streamlined accounting, 227; Streamlined Accounting (GST/HST) Regulations; Memo 600-4; TIB B-028, B-070, see also Rebate: special quick method; Simplified

 revocation of election in HST transitional year, 363.2; New Harmonized Value-added Tax System Regulations s. 58

Street, see Road

Stud services

- horse owned for, joint venture election, Joint Venture (GST/HST) Regulations s. 3(1)(j)
- taxable, Memo 4-4 para. 3

Student residence

- exception to self-supply rules, 191(6); Memo 19-2-3 para. 49
- long-term rentals exempt, V-I-6, V-VI-25
- rebate for new rental housing, 256.2(3.3), (3.4)
- short-term rentals taxable, V-VI-25(e)

Students, exempt supplies to, V-III, see also Educational services

Stumpage fees

• no tax on, 162(1)

Subcontracting

 freight services, zero-rated, VI-VII-11; Memo 28-2 paras. 44–62; Policy P-157

Subcontractor

• residence for at remote work site, exception to self-supply, 191(7)(b)(i)(B); Memo 19-2-3 paras. 51–58

Subdivided land

• exemption on sale, V-I-9(2)(c); Memo 19-5 paras. 11-14

Subjacent land

constitutes part of residential complex, 123(1)"residential complex"

Sublease

- entered into before August 8, 1989, transitional rule, 340(6)(b)
- · residential (land or building), see Residential sub-lease

Subscriber (under RESP)

• defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1)

Subscription, *see* Database subscription; Magazine; Newsletter; Newspaper; Offering memorandum

Subscription Agent

• considered supplier of imported publications, Policy P-185R

Subscription price

• defined, 336(6)

Subsequent lease

• defined, 153(4.3)

Subsidiary, see Corporation; Qualifying subsidiary; Winding-up of corporation

Subsidized housing

• calculation of tax on self-supply rules, 191.1

Subsidy, see Funding by government

Substantial alteration of property

• defined, for export distribution centres, 273.1(1)

Substantial completion, see Substantially completed

Substantial renovation, see Renovation: substantial

Substantially all, see All or substantially all

Substantially completed

- construction, repair, etc. of real property or ship
- • deemed to be, under transitional rule, 339(c)
- • tax payable when, 168(3)(c)
- manufacture and assembly of mobile home, Policy P-223
- meaning of, Memo 19-2-3 para. 11; Policy P-223
- new housing rebate due when, 254-256, 256.2
- property deemed, for multiple unit residential complex, 191(9)
- tax payable by builder under self-supply rules when, 191

Substantiating claim for input tax credit

 documentation requirements, 169(4), 223(2); Input Tax Credit Information (GST/HST) Regulations; Memo 8-4

Substitution of security, Policy P-115

Succession of property on death, 267, see also Executor of estate

Sue for tax remitted, right of supplier to, 224

Sufferance warehouse services, zero-rated, VI-VII-13; Memo 28-2 paras. 100–103; TIB B-055

Sugar

- beets, zero-rated, VI-IV-3; Memo 4-4 para. 15
- cane, zero-rated, VI-IV-3; Memo 4-4 para. 15
- coated fruits, seeds, nuts and popcorn, taxable, VI-III-1(e); Memo 4-3 paras. 45–54
- · zero-rated, as food, VI-III-1

Suggested retail price

• defined, for direct seller rules, 178.1; Memo 1-5

Suing

· for collecting tax, prohibited, 224.1

Suite, see Hotel

Summary conviction, see Offences

Summer camp, see Camp

Sunset provision

• HST regulations, 277.1(3)

Superintendent

• defined, 123(1)

Supervision of children, see Child care; Day camp, exempt

Supervision of impaired person, see Respite care

Supplement, see Dietary supplements, taxable

Supplier, see also Recipient; Supply

- cannot be sued for collecting tax, 224.1
- defined, 123(1); Memo 3-1 para. 23
- first, of a tour package, 163(3)"first supplier"
- issuing invoice, triggers tax liability, 152(1)(a), 168(1)
- rebate provided by, to consumer, 181.1; Memo 300-7-6
- registration requirements, see Registration (for GST/HST)
- required to collect tax, 221(1), (2); Memo 3-1 paras. 23-34
- right to sue recipient for tax remitted, 224
- small, see Small supplier

Supply, Memo 300, see also Taxable supply

- · activities deemed not to be
- • gift certificate, issue of, 181.2; Policy P-202
- • natural resource royalties, 162; Policy P-105R, P-110R
- services of agent to undisclosed principal, 177(1) [repealed], 177(1.1) [repealed]
- • services of joint venture operator to co-venturer, 273(1)(c)
- • sponsorship of public service activities, 135
- • transfer of property on amalgamation, 271(c)
- • transfer of property on wind-up of subsidiary, 272(b)
- • transfer of security interest, 134; Policy P-115, P-120, P-122
- activities deemed to be, 123(1)"supply" (Related Provisions); Memo 3-1 paras. 81–103
- • appropriation of property as capital property, 196.1
- • appropriation of property for personal use, 172(1)
- • benefit conferred on employee, 173(1)
- • benefit conferred on shareholder, 172(2), 173(1)
- • ceasing to be registrant, 171(3)(a)(i)

- change in use of capital property, see Change in use of capital property
- • conversion of non-capital property to capital property, 196.1
- • distributing trust property to beneficiaries, 269
- insurer using property received in settlement of claim, 184(3)
- • placing of a bet, 187
- • settling property on a trust, 268(a)
- transfer between permanent establishments, 132(4), 220; Memo 300-9; TIB B-095
- • using seized or repossessed property, 183(4), (5)(a), (6)(a)(i)
- after 1990, transitional provisions, 336–347
- agreement deemed to be, 133
- artists, on behalf of, 177(2); Artists' Representatives (GST/HST) Regulations; TIB B-009
- before release, deemed made outside Canada, 144
- between permanent establishments, 132(4), 220; Memo 300-9 paras. 14–16; TIB B-095
- business assets, of, 167(1), (1.1); Memo 14-4
- by agent for undisclosed principal, 177(1) [repealed], 177(1.1) [repealed]
- by governments and municipalities, 146, V-VI
- by non-resident, 143, 180
- by small supplier that is not registered, 166
- capital property, see Capital property
- combined with other supply, see Combined supply
- completed, timing of tax liability, 168(3), Memo 300-6-11
- • GST transitional rule, 337(10)
- • HST transitional rule, 352(12); TIB B-077
- consideration for, see Consideration
- continuous, see Continuous supply (electricity, gas, etc.)
- deemed, see activities deemed to be (above)
- defined, 123(1)
- payment for damage to rental vehicle, Policy P-225
- exempt, 123(1)"exempt supply", Sch. V, see also Exempt supplies
- free, to promote another activity, 141.01(4); Memo 8-3 paras. 29–30
- in course of commercial activities, see Input tax credit; Use: in commercial activities
- incidental, 138, see also Incidental supply
- lease or rental, see Lease (or license)
- made in Canada, 142(1), 143
- made outside Canada, not taxed, 142(2), 143, 144, 165(1)
- membership, of, see Membership
- mixed, see Combined supply
- multiple vs. single, Policy P-077R2
- nominal consideration, for, see Nominal consideration, supply for
- not at arm's length, 155
- person to whom made, constitutes recipient, 123(1)"recipient"
- place of, see Place of supply
- prepaid, to consumers, transitional rules, 337(7), (8)
- property, see Personal property; Property; Real property
- release of right to sue is not supply, Policy P-218R
- rental, see Lease (or license)
- sale, see Sale
- seized or repossessed property, of, 183(2); Policy P-175

Supply (cont'd)

- · separate, deemed
- exempt multiple unit residential complex and taxable addition, 136(3)
- • residential complex and other real property, 136(2)
- • returnable beverage container, 226(2)
- • tax return preparation and tax refund discount, 158(b)
- • tour package, taxable and non-taxable portions, 163(2)
- service, see Service
- single vs. multiple, see Single supply
- taxable, see Taxable supply
- together with other supply, meaning of, Policy P-160R
- when constitutes taxable supply, 123(1)"taxable supply"
- zero-rated, 123(1)"zero-rated supply", 165(3), Sch. VI, see also Zero-rated supplies

Support capital

• defined, for imported supplies between branches, 220(1)

Support mechanisms for mobile homes, Policy P-070R

Support resource

• defined, for imported supplies between branches, 220(1)

Support service

- provided by computer, place of supply for HST
- after April 2010, New Harmonized Value-added Tax System Regulations s. 32

Supporting documentation (for input tax credit)

- defined, Input Tax Credit Information (GST/HST) Regulations
 s. 2; Memo 8-4 paras. 15, 33
- information required on, 169(4); Input Tax Credit Information (GST/HST) Regulations; Memo 8-4 paras. 18–33

Surety (under construction bond)

- defined, 184.1(2)
- limitation on input tax credits, 184.1(2)(d)

Surety bond, see Construction: bond

Surgeon, see Medical

Surgical equipment or supplies

 institutional health care service, exempt, V-II-1"institutional health care service"(d), V-II-2

Surgical prosthesis

Suspended sentence

- exempt when supplied in health care facility, V-II-1"institutional health care service"(b)
- zero-rated, VI-II-25, 26; Memo 4-2 paras. 43, 44

Surgical stockings, zero-rated, VI-II-35; Memo 4-2 para. 51

· not permitted when minimum punishment provided, 331

Swap

- of inventory between registrants, 153(3)
- of land, 153(3); Memo 19-5 paras. 71-75

Sweetened baked goods, taxable, VI-III-1(m); Memo 4-3 paras. 87–94

Sweetened ice waters, taxable, VI-III-1(j); Memo 4-3 paras. 71–73

Sweetening agents

 coated or treated fruits, nuts, seeds or popcorn, taxable, VI-III-1(e); Memo 4-3 paras. 45–54

- · filling or coating
- baked goods with, in quantities less than six, taxable, VI-III-1(m); Memo 4-3 paras. 87–94
- • bread products without, zero-rated, VI-III-1(m); Memo 4-3 para. 94
- meaning of, Memo 4-3 paras. 90–91
- zero-rated, VI-III-1

Swine, zero-rated, VI-IV-1; Memo 4-4 para. 5

Symbolic consideration, see Nominal consideration, supply for

Synagogue, see Charity

Syringe, for insulin, zero-rated, VI-II-21; Memo 4-2 para. 31

Syrup-coated or -treated fruits, nuts, seeds or popcorn, taxable, VI-III-1(e); Memo 4-3 paras. 45–54

Systen

• accounting, separate records maintained, 129(3)(b)

Т

TAN, see Tax adjustment note

TFSA

- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(iv.1)
- defined
- • for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)
- for financial services definition, Financial Services and Financial Institutions (GST/HST) Regulations s. 2(2)
- • for HST place of supply rules
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 2
- · trustee services, whether HST applies
- after April 2010, New Harmonized Value-added Tax System Regulations s. 30

TLOPA, see Time Limits and Other Periods Act (COVID-19)

Tablets, urinary-sugar or urinary-ketone testing, zero-rated, VI-II-29; Memo 4-2 para. 47

Takeover fees

- deemed used in commercial activity (so input tax credit available), 186(2); Memo 8-6 paras. 17–26
- whether accounts receivable of target corporation used in commercial activity, Policy P-013

Talking book

 rebate on purchase by public service body, 259.1(2)(b); Memo 13-4

Tampons, see Feminine hygiene product

Tangible personal property, *see also* Goods; Personal property; Property; Specified tangible personal property; Supply

- continuous freight movement of, see Freight transportation
- defined, for Division IV.1, 220.01
- defined to include money, for zero-rated export rules, VI-VII-
- destroying or discarding for non-resident, service zero-rated, VI-V-19; Memo 4-5-3 para. 79
- drop-shipped, 179

Tangible personal property (cont'd)

- self-assessment requirement, 217"imported taxable supply"(b), 219
- · export of
- supply made outside Canada, not taxed, 142(2)(a), (b); Policy P-078R
- • zero-rated, VI-V-1, 12; Memo 4-5-2
- installed for non-resident supplier, rebate, 252.41
- lease of, see Lease (or license)
- personal property defined, 123(1)
- place of supply, 142(1)(a), (b), 142(2)(a), (b), 143
- · place of supply for HST, IX-II
- rebate to non-resident business for purchase of, 252(1)
- · service relating to
- • HST place of supply after April 2010, New Harmonized Value-added Tax System Regulations ss. 15, 16, 29
- • whether supply made in Canada, 142(1)(b), 142(2)(b)
- • whether supply zero-rated, VI-V-7(e); Memo 4-5-3 paras. 14–19, 21–22
- · situated in Canada
- • meaning of, Policy P-169R
- sold at duty-free shop, zero-rated, VI-V-11; Memo 4-5-2 paras.
 34–36
- sold to duty-free shop, zero-rated, VI-V-16; Memo 4-5-2 paras. 34, 37–38
- · specified, see Specified tangible personal property
- supply by non-resident, 180
- used, defined, 123(1)"used tangible personal property"
- used specified, defined, 123(1)"used tangible personal property"

Tapes and disks, see Audio-cassette supplied with publication; Computer carrier media

Tariff items, see Customs Tariff

Tarts, taxable where packaged less than six, VI-III-1(m); Memo 4-3 paras. 87, 89, 93, 96, 137

Taverns

 supplies of food taxable, VI-III-1(q); Memo 4-3 paras. 136–139

Tax, see also Net tax

- · audit, see Audit by Canada Revenue Agency
- avoidance, see General anti-avoidance rule
- collected or deemed collected, included in net tax, 225(1)
- · collection of, see Collection of tax
- · Court, see Tax Court
- debt to Her Majesty, 313(1.1)
- defined, 123(1)
- • re duties and fees, *Taxes, Duties and Fees (GST/HST) Regulations* s. 2(1)
- department, see Revenue Canada
- · failure to pay, see Offences; Penalties
- fraction
- • after March 1997, see Basic tax content
- defined
- • before April 1997, 123(1)
- • for coupon rules, 181(1)
- • for manufacturer's rebate, 181.1(e)

- • 4/104, 12/112 or other factor for employee benefits, 173(1)(d)(vi)(B); Memo 9-1 paras. 40–41, Appendix C; Memo 9-2 para. 57, Appendix C
- imposition of, see Imposition of tax (charging provisions)
- · incorrectly charged
- • input tax credit for, 296(2.1), 296(4.1) [repealed]
- rebate of, 261
- municipal, exempt, V-VI-21
- • seizure of property for failure to pay, 183(10)
- ••• redemption, 183(10.1), Policy P-198
- · paid, credit for, see Input tax credit
- paid in error
- • input tax credit for, 296(2.1), 296(4.1) [repealed]
- • rebate of, 261
- · paid or payable
- • defined, Input Tax Credit Information (GST/HST) Regulations s. 2
- · rate of, see Rate
- rebate discounter or tax refund discounter, 158; Memo 17-10
- return preparation and transmission, not a telecommunication service, TIB B-090
- when payable, 168, see also Time: tax payable

Tax adjustment note

• to transfer expenses from pension plan to employer, 232.01(3), 232.02(2); TIB B-XX4; Notice 261

Tax adjustment transfer election

• to transfer investment plan's net tax adjustments to manager, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 55; Notice 260

Tax advisor

• penalty for misrepresentation by, 285.1

Tax amount

 defined, for information return for financial institutions, 273.2(1)

Tax benefit

- defined
- •• for tax-debt avoidance penalty, 285.03(1), 285.1(1)

Tax Court of Canada

- appeal to
- • after filing notice of objection, 302, 306-309
- • determination of tax status on importation, 216(4)
- · · restrictions on
- ••• where insufficient detail on notice of objection, 306.1(1)
- ••• where right to object or appeal waived, 306.1(2)
- costs awarded against taxpayer, become tax debt, 313(4)
- defined, 123(1)
- extension of time by, to file notice of objection, 304
- extension of time to appeal, 305

Tax credit, see Input tax credit

Tax credit amount (for ITC allocation of financial institution)

• defined, 141.02(1)

Tax credit rate (for ITC allocation of financial institution)

• defined, 141.02(1)

Tax debt

- action to commence, 10-year limitation period, 313(2.1)-(2.8)
- · collection of, see Collection of tax

Tax debt (cont'd)

- defined, 313(1)
- recoverable by the Crown, 313(1.1)

Tax informant program, see Informant payments (for leads on international tax evasion)

Tax paid or payable, see Tax: paid or payable

Tax rate

- federal (GST), 165(1), 212
- New Brunswick, New Harmonized Value-added Tax System Regulations s. 33.4
- Newfoundland & Labrador, New Harmonized Value-added Tax System Regulations s. 33.5
- Nova Scotia, New Harmonized Value-added Tax System Regulations s. 33.6(2)
- Ontario, Sch. VIII
- Prince Edward Island, New Harmonized Value-added Tax System Regulations s. 33.3(3)

Tax recovery rate

- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(4)
- defined, for pension plan rebate, 261.01(1); TIB B-XX4

Tax-extra or tax-inclusive pricing

- · assessment choice by CRA, Policy P-118R
- requirement to disclose, 223(1), (1.1)
- suing for unpaid tax, 224
- where invoice silent, Policy P-116

Tax-free, see Exempt supplies; Non-taxable; Zero-rated supplies

Tax-Free Savings Account, see TFSA

Tax-free savings plan, see TFSA

Tax-inclusive pricing, see Tax-extra or tax-inclusive pricing

Tax-paid goods

- defined, 120(1)
- FST inventory rebate for, 120(3)
- items removed from, no rebate, Policy P-127

Tax-relieved supply

 defined, Non-Taxable Imported Goods (GST/HST) Regulations s. 2

Taxable benefit, see Benefit

Taxable percentage (of a tour package), 163(3)

Taxable portion (of a tour package), 163(3)

Taxable service (telecommunications and telecommunications programming)

- defined, for repeal of Parts II.1 and II.2, 117(1)
- no tax after 1990, transitional rules, 117(2), (3)

Taxable supply, Memo 3-1 paras. 64–69, *see also* Commercial activity; Supply

- · activities deemed not to be, see also Supply
- sale of capital personal property not used in commercial activities, 200(3)
- • sale of passenger vehicle or aircraft not used exclusively in commercial activities, 203(3)
- activities deemed to be, or supply deemed made, see also Supply

- • appropriation of real property by individual, 190(2)(c)
- • ceasing to use automobile or aircraft exclusively in commercial activities, 203(2)(a)
- • election by public service body in respect of real property, 211(2), (4)
- forfeiture of deposit or other amount, 182
- • payment of rebate by manufacturer, 181.1; Memo 300-7-6
- • self-supply by builder of residential property, 191(1)–(4)
- deemed to be at nil consideration, upon election within corporate group, 156(2); Memo 14-5
- defined, 123(1); Memo 3-1 paras. 64-69
- release of right to sue is not taxable supply, Policy P-218R
- tax on, 165(1)

Taxation area (Canada and continental USA)

- air travel within, not zero-rated, VI-VII-3; Memo 28-3 para. 41
- defined, VI-VII-1(1); Memo 28-3 paras. 18-19

Taxation year, *see also* Fiscal period; Fiscal year; *Income Tax Act* provisions and terms incorporated by reference; Reporting period

- defined, 123(1)
- election for fiscal year to be, 244(2)

Taxi, see also Taxi operator

 excluded from recapture of Ontario/BC HST ITCs, New Harmonized Value-added Tax System Regulations, No. 2, s. 28(2)(f)

Taxi business, see also Taxi operator

• defined, 123(1)

Taxi operator

- becoming a registrant for other activities, 171.1(2)
- ceasing to be registrant for other activities, 171.1(3), 242(2.1)
- registration for other business activities, 240(3.1), 241(2)
- required to register, 240(1.1); Memo 2-1 para. 2
- transitional credit for small supplier, 347; Memo 200-9 paras. 20–24
- unregistered for other activities, 171.1(1), 241(2)
- variation of registration to exclude other activities, 242(2.1), 242(3)

Taxidermy, Info Sheet GI-047

Taxing statute

• defined, for importation of service from foreign branch, 217

Taxpayer Relief (formerly Fairness)

- waiver of interest and penalty, 281.1; Memo 16-3
- voluntary disclosures, Memo 16-5; Information Circular 00-1R5
- • wash transactions, Memo 16-3-1

Tea

• dispensed, taxable, VI-III-1(0.4); Memo 4-3 para. 120

Technical Information Bulletins, *see* "Technical Information Bulletins" tab (Binder P4)

• index of, Memo 1-3

Technical institute, see also Vocational school

- rebate for printed books, 259.1; Memo 13-4
- whether public college, 123(1)"public college"; Memo 20-2

Teeth, see Dental

Telecommunication service, see also Telephone

- defined, 123(1), Interpretation Act s. 35(1); Memo 4-5-3 para.
 85; TIB B-090
- · HST place of supply rules
- • after April 2010, IX-VIII; New Harmonized Value-added Tax System Regulations s. 31
- Internet access, TIB B-090
- · 1-900 and 1-976 calls, place of supply for HST
- after April 2010, New Harmonized Value-added Tax System Regulations s. 31
- place of supply (in or outside Canada)
- • billing location determined, 142.1(1)
- facility or instrument ordinarily in Canada, 142(1)(e) [repealed]
- facility or instrument ordinarily outside Canada, 142(2)(e) [repealed]
- • two-out-of-three rule, 142.1(2)
- recapture of Ontario/BC HST ITCs [until 2021], New Harmonized Value-added Tax System Regulations, No. 2, s. 28(1)(f), (g), 28(2)(c)–(e), (g)
- supplied between municipal entities, taxable, V-VI-28(f)
- supplied to non-resident, zero-rated, VI-V-7(h), VI-V-22; Memo 4-5-3 paras. 83–86
- · voice telephony, TIB B-090
- whether taxable, see place of supply (above)
- zero-rated where supplied to unregistered non-resident telecom company, VI-V-22.1; Memo 4-5-3 para. 84

Telecommunications

• defined, Interpretation Act s. 35(1)

Telecommunications channel

- access to, recapture of Ontario/BC HST ITCs, 236.01; New Harmonized Value-added Tax System Regulations, No. 2, s. 28(1)(g), 28(2)(c)–(e), (g)
- dedicated, place of supply for HST, 136.4(2), IX-VIII-3
- defined, 136.4(1)
- place of supply
- • GST (whether in/outside Canada), 142.1
- • HST (whether in a participating province), IX-VIII-2

Telecommunications facility

• defined, 123(1); Memo 4-5-3 para. 86; TIB B-090

Telegram, constitutes a record, 123(1)"record"

Telegraph

- cables, oceanic, supply to non-resident for laying or repair, VI-V-2(c); Memo 4-5-2 para. 21(c)
- communication device for disabled person, VI-II-2; Memo 4-2 para. 1

Telephone, see also Telecommunication service

- business, separate ITC allocation required, *Streamlined Accounting (GST/HST) Regulations* s. 21(2)
- coin-operated, calculation of tax, 165.1(1)
- communication device for disabled person, VI-II-2; Memo 4-2 para. 31
- directory, "Government Directory" tab (Binder C1)
- disclosure of GST applicable, 223(1); Disclosure of Tax (GST/HST) Regulations s. 2(2)
- equipment, see Telecommunications facility
- sales to Indians, documentation required, Info Sheet GI-127

- service, see Telecommunication service
- 1-900 and 1-976 calls, place of supply for HST
- after April 2010, New Harmonized Value-added Tax System Regulations s. 31
- • before May 2010, Place of Supply (GST/HST) Regulations s. 9

Television

- advertising, see Advertising
- decoder, for the hearing-impaired, zero-rated, VI-II-2; Memo 4-2 para. 1
- tax on telecommunication programming (cable television), repealed, 117

Temporary cessation of filing, 238.1, TIB B-072

Temporary importation

- conveyances, Policy P-024R
- · foreign rental vehicles
- · · imported by Canadian residents
- ••• resident outside Canada at least 48 hours, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations, s. 3(m)
- resident not outside Canada at least 48 hours, partial tax, 215(2); Value of Imported Goods (GST/HST) Regulations, s. 15
- • • HST, 212.1(2)(a), New Harmonized Value-added Tax System Regulations, s. 6.1
- • imported by non-residents, VII-1; Non-residents' Temporary Importation of Baggage and Conveyances Regulations
- goods from United States or Mexico
- • no GST on importation, VII-1
- • no HST on bringing into participating province, X-I-8
- service on, zero-rated, VI-V-4
- valuation of, Value of Imported Goods (GST/HST) Regulations s. 3; TIB B-031

Temporary Importation Regulations

no tax on importation of certain goods described in, VII-8;
 Non-Taxable Imported Goods (GST/HST) Regulations s. 3(i)

Temporary member

defined, for election between related corporations, 156(1);
 Memo 14-5 paras. 14-16

Temporary recapture of ITCs, see Recapture of input tax credits

Tenant, see also Lease (or license)

• supply to by builder, see Self-supply rules

Tenant inducement, see Lease (or license): inducement

Termination, see also Cancellation

- contract, fee paid, 182; Policy P-218R
- of commercial activity, things done deemed in course of commercial activity, 141.1(3)
- of continuous journey, defined, VI-VII-1(1), New Harmonized Value-added Tax System Regulations s. 20; Memo 28-3 para.
- of registration, see Ceasing to be a registrant

Territorial government, application of GST, 122; TIB B-006; Memo 18-2

Testamentary trust

• defined, 123(1)

Testing service

- goods imported for, Goods Imported for Certification Remission Order
- of electronic filing, before permitted, Memo 7-5 paras. 33-34
- provided to non-resident, whether zero-rated, VI-V-21; Memo 4-5-3 para. 81
- taxable, 146(a), V-VI-21

Testing strips

- blood or urinary, zero-rated, VI-II-29; Memo 4-2 para. 47
- blood-coagulation, zero-rated, VI-II-29.1(b)

Theatre, see Place of amusement

Therapist, see Health care services, exempt

Therapy

- neuromuscular stimulation, device for, zero-rated, VI-II-41
- · service, see Health care services, exempt: therapy
- standing stimulation, device for, zero-rated, VI-II-41

Third party

- demand, see Garnishment (of amounts payable to tax debtor)
- penalty for misrepresentation by, 285.1
- policyholder for group insurance, Policy P-161 (obsolete), P-182R
- remittance of tax by, Policy P-131R

Third-party demand, *see* Garnishment (of amounts payable to tax debtor)

Threshold amount, *see also* Dollar amounts in legislation and regulations

- defined
- • for filing frequency, 249
- • for non-resident e-commerce, 211.12(1)
- for public service body rebate, Public Service Body Rebate (GST/HST) Regulations s. 6
- for streamlined input tax credit method, Streamlined Accounting (GST/HST) Regulations s. 21.1
- for election to file annually, 249(1); Memo 500-2-1
- for election to file quarterly, 249(2); Memo 500-2-1

Threshold period

 defined, Streamlined Accounting (GST/HST) Regulations s. 15(3)

Ticket, see also Admission; Lottery; Prizes; Travel agent

- single, for international travel, VI-VII-1(1)"continuous journey"; Memo 28-3 paras. 3-6, 15
- used as coupon for discount, 181(1)

Tillage equipment, zero-rated, VI-IV-10, *Agriculture and Fishing Property (GST/HST) Regulations* Sch:1(1)(c); Memo 4-4 Schedule

Tim Horton's rule

 point of sale rebate for prepared food up to \$4, 234(4); Info Sheet GI-065; Deduction for Provincial Rebate (GST/HST) Regulations Sch. 1, s. 11

Timber resource

 processing of, joint venture election, Joint Venture (GST/HST) Regulations s. 3(1)(g), (p)

Timberland

 place of extraction constitutes permanent establishment, 123(1)"permanent establishment"(a)(ii) Time, see also Interest; Penalties

- assessment, for, 298
- consideration deemed due, 152
- extension of, for filing notice of objection or appeal, 303-305
- limits, see Limitation period
- reassessment, for, 298
- tax collected to be remitted, 228, 280
- tax payable, 168; Memo 300-6
- • agreement in writing, 152(1)(c); Memo 300-6-4
- • combined supplies, 168(8); Memo 300-6-16
- • consignment sales, 168(3); Memo 300-6-9
- • construction contracts, 168(2), (7); Memo 300-6-13; Memo 19-1 paras. 72–80, 92–97
- • continuous supplies, 168(4); Memo 300-6-6
- • deposits, 168(9); Memo 300-6-8; Memo 19-1 paras. 66-71
- • general rule, 168(1); Memo 300-6-1
- • goods brought into HST province, 220.05(2)
- • holdbacks, 168(7); Memo 300-6-14; Memo 19-1 paras.
- • override rule, 168(3); Memo 300-6-11
- • partial payments, 168(2); Memo 300-6-7
- real property, 168(5); Memo 300-6-5; Memo 19-1 paras. 59–84, 92–97
- • supply completed, 168(3); Memo 300-6-11
- • value not ascertainable, 168(6); Memo 300-6-15

Time Limits and Other Periods Act (COVID-19), see s. 298 (Notes)

Timeshares, Memo 19-2-4 paras. 19–21; Policy P-064 (obsolete)

• excluded from non-resident rebate, 123(1)"short-term accommodation"(b)(i)

Timing, see Time: tax payable

Tips and gratuities

• not taxed where voluntary, 153 (Q & A)

Tissue, human, zero-rated, VI-II-25

Title to property

• information or certificate exempt, V-VI-20(e)(i)

Tobacco, see also Excisable goods

- constitutes excisable goods, 123(1)"excisable goods"
- excise taxes on, Sch. II; Memo 800-1
- excluded from non-resident business rebate for goods exported, 252(1)(a)
- export of, tax on, Memo 800-4
- inventory tax, 29–34 [repealed]
- leaves, whether zero-rated, VI-IV-7; Memo 4-4 para. 33
- manufactured, imported by mail, taxable, VII-7; Mail and Courier Imports (GST/HST) Regulations s. 3(a); Courier Imports Remission Order s. 2"goods"(a); Postal Imports Remission Order s. 2"goods"(a)
- not eligible for public service body rebate, rules, Public Service Body Rebate (GST/HST) Regulations s. 4(1)(e); TIB B-025
- products, exported in bond, zero-rated, VI-V-3; Memo 4-5-2 paras. 26, 27

Toilet articles, see Cosmetic

Toilet seat designed for disabled individual, zero-rated, VI-II-20; Memo 4-2 para. 30

Toll-free telephone lines

 excluded from recapture of Ontario/BC HST ITCs, New Harmonized Value-added Tax System Regulations, No. 2, s. 28(2)(c)

Tolls, exempt, V-VIII; Memo 28-1

 international ferry, zero-rated, VI-VII-14; Memo 28-1 paras. 2-52

Tools, jigs, molds, dies and fixtures

- · mechanics' tools, see Apprentice mechanics' tools
- supplied to non-resident, zero-rated, VI-V-14; Memo 4-5-2 paras. 51-52

Toothpaste or tooth powder, see Cosmetic

Toronto

 municipal land transfer tax, not included in consideration for GST/HST, Taxes, Duties and Fees (GST/HST) Regulations s. 3(a)(i.1)

Toronto Pan American Games, see Pan American Games and Parapan American Games

Tori

• payment for, not a supply, Policy P-218R

Tortoise shell, articles made of

• excise tax on, I-5(b); Memo 800-1

Total A amounts

• defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)

Total B amounts

 defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)

Total F amounts

 defined, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 42(1)

Total gross revenue

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 16(1)

Total participating provinces unit value

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 7(4)(a)

Total tax charged in respect of a property or service

defined, 259(1)"non-creditable tax charged"

Total tax recovery rate election, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 43

Total threshold amount

 defined, Streamlined Accounting (GST/HST) Regulations s. 2(3)

Tour, see also Tour guide service; Tour operator; Tour package

· excluded from municipal transit service, V-VI-1

Tour guide service, 163(3)"tour package"

Tour operator, Memo 27-3; Memo 28-3

- rebate of GST paid in error, Memo 28-3 paras. 48-49; Policy P-037
- unregistered, accommodation rebate before 2018, 252.1(3); Info Sheet GI-033

Tour package, Memo 27-1

- defined, 163(3), 252.4(0.1); Memo 27-1 paras. 3–5; Info Sheets GI-032, GI-044
- non-taxable portion zero-rated, VI-VI-1; Memo 27-1 para. 15
- provincially taxable portion, 163(2.1)
- taxable and non-taxable portions, 163(2); Memo 27-1 paras.
 8-14

Tourism, Memo 27

- board, see Para-municipal organization
- literature
- • no GST on importation, VII-3
- • no HST on bringing into participating province, X-I-12

Tourist literature, no tax on importation, VII-3

Tourist rebate, 252–252.2. see also Non-resident: rebate

Tourists' baggage

- no GST on importation, VII-1
- no HST on bringing into participating province, X-I-3

Tournament, see Competitive event

Tow truck operators, see Towing service

Towing service

 zero-rated as interline freight transportation service, Memo 28-2 para. 26

Town or township, see Municipality

Tracheostomy supplies, zero-rated as medical devices, VI-II-5.2; Memo 4-2 para. 10

Tractor, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(a)

Trade, adventure in the nature of, see Adventure in the nature of trade

Trade accreditation, courses exempt, V-III-6, 8; Memo 20-4

Trade-in (of used property)

- defined, for HST transitional rule for vehicles, 354.1(b)
- input tax credit to dealer, 176(1) [repealed]; TIB B-084
- reduces consideration of new property, 153(4), (5); TIB B-084
- vehicle leased in HST province before April 1997, 354.1

Trade name

- supplied to non-resident, zero-rated, 142(2)(c), VI-V-10; Memo 4-5-3 para. 106
- • used in business in Canada, 217"imported taxable supply"(c.1)

Trade secret

- supplied to non-resident, zero-rated, 142(2)(c), VI-V-10; Memo 4-5-3 para. 106
- used in business in Canada, 217"imported taxable supply"(c.1)

Trade union

- constitutes a person, 123(1)"person"
- deemed resident in a province, 132.1(1)(c)
- deemed resident in Canada, 132(1)(c)
- exemption for membership dues, 189; Memo 400-3-7
- exemption for supplies from or to labour organization, V-VI-26
- payment to employer for worker's time spent on union business, non-taxable, 164.2

Trademark

- supply by public service body of use of, deemed not to be a supply, 135(b)
- supply to non-resident, zero-rated, 142(2)(c), VI-V-10; Memo 4-5-3 para. 106
- used in business in Canada, 217"imported taxable supply"(c.1)

Trader or dealer in financial instruments or money

• constitutes listed financial institution, 149(1)(a)(iii)

Traffic lights

 installing, replacing, repairing or removing, exempt, V-VI-21.1(a)

Trail mix

• taxable, VI-III-1(i); Memo 4-3 para. 70

Trailer

- agricultural, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(g)(iv.1)
- · commission servicing fees, Policy P-119
- excluded from definition of mobile home, 123(1)
- lease of land for, V-I-7(b); Memo 19-2-2 para. 16
- park
- • defined, 123(1); Memo 19-2 para. 52
- residential, see Residential trailer park
- • right to use, 163(3)"tour package"
- travel, see Travel: trailer

Train, see Passenger transportation service; Railway

Training

- courses, see Educational services; Vocational school
- of individual to use guide dog, zero-rated, VI-II-33; Memo 4-2 para. 49
- provided for non-resident businesses, zero-rated, VI-V-18; Memo 4-5-3 paras. 73–78, Memo 20-8
- provided outside Canada, whether taxable, 217"imported taxable supply"(a)(ii)
- to cope with disability or disorder, VI-II-14, 15

Training service

· defined, V-II-15

Transaction

- avoidance, for general anti-avoidance rule, 274(3); TIB B-045
- defined
- • for section 325 avoidance planning, 285.03(1)
- includes arrangement or event
- • for general anti-avoidance rule, 274(1)"transaction"
- for importation of service from foreign branch, 217"transaction"
- · with related non-residents, disclosure, 294

Transfer, see also Sale; Supply

- constitutes supply, 123(1)"supply"
- of farmland to related person and self as joint tenants, Policy P-109
- of money, constitutes financial service, 123(1)"financial service"(a)
- · of ownership, see Ownership, transfer of
- of possession, see Possession
- · of property

- • between permanent establishments of a person, 132(4), 220
- not at arm's length, joint liability for transferor's tax owing, 325
- • on satisfaction of debt, Policy P-120
- • under agreement of sale, constitutes sale, 123(1)"sale"
- of security interest, not a supply, 134; Policy P-115, P-120, P-122
- payment, whether a supply, Memo 18-4

Transferee corporations

• defined, 156(1)"temporary member"(f)(i)

Transit, see also Passenger transportation service

- authority defined, V-VI-1"transit authority"
- goods in, not subject to HST, 220.03; TIB B-XX5
- services exempt, V-VI-24

Transit pass

• exempt as service, V-VI-1"municipal transit service"

Transitional rules (6% to 5% rate)

• funerals (prepaid), Info Sheet GI-040

Transitional rules (7% to 6% rate)

- funerals (prepaid), Info Sheet GI-016
- rate reduction, 165(1) (History); Info Sheet GI-013

Transitional rules (BC withdrawal from HST, 2013), see British Columbia: withdrawal from HST

Transitional rules (Federal Sales Tax 1990-1991), 117-121

Transitional rules (GST, 1991), 336–347; TIB B-001; Memo 500-6-6, *see also* Transitional rules (FST); Transitional rules (HST)

• funeral arrangements, 344

Transitional rules (HST, 1997) in Atlantic provinces, 348–363.2; TIB B-077

• funeral arrangements, 360

Transitional rules (HST, 2010) in Ontario and BC, New Harmonized Value-added Tax System Regulations ss. 38–55; New Harmonized Value-added Tax System Regulations, No. 2, ss. 48–58

· funeral services, NHRegs s. 47; Info Sheet GI-074

Transitional rules (HST, 2013) in PEI, New Harmonized Valueadded Tax System Regulations [NHRegs] ss. 58.2–58.45

• funerals, NHRegs s. 58.29; Info Sheet GI-142

Transitional rules (HST, 2016, for NB and NL rate increases), New Harmonized Value-added Tax System Regulations ss. 33.4–33.5 (History)

 consequential amendments, New Harmonized Value-added Tax System Regulations ss. 58.48–58.57

Transitional rules (HST, 2016, for PEI rate increase), New Harmonized Value-added Tax System Regulations s. 33.3(3) (History)

 consequential amendments, New Harmonized Value-added Tax System Regulations ss. 58.57–58.62

Transitional rules (HST, BC withdrawal, 2013), see British Columbia: withdrawal from HST

Transitional rules (HST, Nova Scotia, 2025), New Harmonized Value-added Tax System Regulations s. 33.6(2

Transmission of electrical power

• joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(f)

Transmission of telecommunication service

- · effect on place of supply
- GST, 142.1(2)

Transportation, see also Freight transportation service; Passenger transportation service

- pass, transitional rules, see Pass, transportation
- place of supply, for HST, New Harmonized Value-added Tax System Regulations ss. 21–22; Memo 28-3 paras. 60–64
- rebate program, 68.4; Memo 800-1 paras. 21-23
- services
- in Canada, zero-rated as part of international travel, VI-VII-2, 3; Memo 28-3 paras. 13–16, 38–47; Policy P-037
- made outside Canada, not taxed, 217"imported taxable supply"(a)(v)
- • zero-rated, VI-VII; Memo 28-2, 28-3
- · tour package, 163
- · transitional rules
- • GST, 342, 343
- • HST, 358, 359; TIB B-077

Travel, see also Passenger transportation service

- · agent, see Travel agent
- allowances, paid to employee, partner or volunteer, 174; Policy P-075R
- assistance services provided to non-resident tour operator, Policy P-144 (obsolete)
- compensation for, to amateur performer or competitor, V-VI-
- international, zero-rated, VI-VII-2, 3, 4, 5; Memo 28-3 paras. 38–47
- services, zero-rated, see Tour package
- trailer, see also Residential trailer park
- • excluded from definition of mobile home, 123(1)
- • lease of land for, V-I-7(b); Memo 19-2-2 para. 16
- whether mobile home, residential unit or residential complex, Policy P-104R

Travel agent

- · commission on zero-rated travel, zero-rated, VI-VII-5.1
- · service of issuing, delivering etc., ticket
- • zero-rated, VI-VII-5

Traveller's cheque, constitutes money, 123(1)"money"

Travellers' exemptions, VII-1

• adjustment to 48-hour exemption, VII-1.2

Traveller's tobacco

• GST on importation, VII-1.1

Treasurer, see also Officer

- authorized to sign documents, 279(a)
- · liable to pay or remit tax for unincorporated body, 324

Treatment, see Health care services, exempt; Medical: devices

Trees, see also Vegetation

• taxable, Memo 4-4 para. 2

Trial goods, no FST inventory rebate, Policy P-127

Tribunal, see Court

Trophy

- · awarded outside Canada or participating provinces
- • no GST on importation, VII-2

- • no HST on bringing into participating province, X-I-11
- imported for award in Canada, no tax, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(k)

Trotting horse-race, bets on pari-mutuel system exempt, V-VI-5?

Truck, see also Motor vehicle

• rented, temporary importation of by Canadian resident, calculation of tax, *Value of Imported Goods (GST/HST) Regulations* s. 15:A(a)(i)

Truck termina

 operation of, qualifies for joint venture election, *Joint Venture* (GST/HST) Regulations s. 3(1)(q)

Trucking, *see* Carrier; Dump truck operator; Freight transportation service

Trust, see also Estate; Trustee

- acquisition of property as residence for beneficiary, 190(1)(f)(ii)
- appropriation of property for beneficiary, 172(2)
- associated with another person, 127(3)(b)
- · bare, see Bare trust
- beneficiaries, see Beneficiary
- clearance certificate, 270
- compan
- • list of GST status of products and services, TIB B-057
- • remittance over \$10,000 required to be made electronically through, 278(3)(a); Memo 7-5 para. 3
- constitutes a person, 123(1)"person"
- contribution of property to (settlement) deemed supply for income tax proceeds, 268
- deemed, when tax collected, 222(1), (3)
- defined, 130.1(a) (certain Quebec arrangements)
- distribution of property by, deemed supply for income tax proceeds, 269
- interest in, constitutes financial instrument, 123(1)"financial instrument"(d)
- inter vivos, see Inter vivos trust
- non-resident
- whether required to self-assess financial institution HST, 217.1(1)(b)(iv); Financial Services and Financial Institutions (GST/HST) Regulations s. 5
- partner of partnership, ITC for purchases relating to partnership, 272.1(2)(b)
- personal, see Personal trust
- registration of, Memo 2-1 para. 14(e)
- restriction on ITCs where property leased to beneficiary, 170(1)(c)(iv); Memo 8-2 para. 20
- · sale of real property by, when exempt, V-I-9
- segregated fund of insurer deemed to be, 131
- tax collected deemed held in, 222(1), (3)
- · testamentary, see Testamentary trust

Trust company, see also Financial institution; Listed financial institution

- constitutes financial institution, 149(1)(a)(iii)
- financial institution's percentage, for HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 26
- GST treatment of products and services, TIB B-057; Memo 17-2

Trustee

- corporation authorized to offer services as (trust company), 149(1)(a)(ii)
- in bankruptcy, see Bankruptcy
- liable for obligations of trust, 267.1(2), (3)
- · services taxable
- • not financial services, 123(1)"financial service"(q), (t)
- • place of supply of services for HST
- • after April 2010, New Harmonized Value-added Tax System Regulations s. 30
- • provided on bankruptcy, 265(1)(a)
- whether an "officer", 123(1)"office"(c)

Tuition fees, exempt, V-III-2, V-III-6, V-III-7, V-III-8, V-III-11, V-III-16; Memo 20-1, 20-2, 20-3, *see also* Educational services

Tunnel

 construction of, to link Canada and USA, supplies to international authority zero-rated, VI-VIII-2; Memo 18-3 paras. 19-22

Turkeys, zero-rated, VI-IV-1; Memo 4-4 para. 5

Tutoring, exempt, V-III-9; *Equivalent Courses (GST/HST)* Regulations; Memo 20-6; TIB B-014

Two out of three rule

 for determining whether telecommunication service taxable, 142.1(2)

U

Uber

• treated as taxi, 123(1)"taxi business"; Info Sheet GI-196

Ultimate recipient

• defined, re buying groups, 178.6(1); Memo 1-5

Ultrasound services, see Radiological services

Unaccompanied child

- · supervision of
- • excluded from child-care exemption, V-IV-1
- • takes HST status of travel service, IX-VI-4(b)
- • takes status of zero-rated travel service, VI-VII-4(b)

Unbottled water, see Water

Uncertainty as to amount of GST, 168(6); Memo 300-6-15 Underprivileged individuals

- · classes or activities for, exempt, V-VI-12
- institutional care for, exempt, V-IV-2
- recreational camp for, exempt, V-VI-13

Underused Housing Tax Act

 compliance with required before refunds etc. paid, 229(2), 230(2), 238.1(2)(c)(iii), 263.02, 296(7)

Underwriting

- constitutes exempt financial service, 123(1)"financial service"(h)
- zero-rated, when provided to non-resident, VI-IX-1(e)

Undisclosed principal, 177(1) [repealed], (1.1) [repealed]

Undivided interest

 in property transferred by tax debtor, fair market value, 325(1.1)

Undue delay in issuing invoice, 152(1)(b)

Unincorporated organization, see also Association

- application to be deemed a branch, 130; Memo 2-4 paras. 21–24
- assessment of binding on each representative, 299(3.1)
- compliance by, 324
- election to be considered same person, 130
- execution of documents for, 279(a)
- · obligations of officers and members, 324
- · residence of
- • in a province, 132(1)(b)
- • in Canada, 132(1)(b)
- service of notice on, how done, 333(1)(c)
- when a person, 123(1)"person"; Memo 2-1 paras. 14(g), 15; Memo 2-4 para. 20
- who constitutes an officer of, 123(1)"officer"

Unintelligible provision, 123(1)"basic tax content", 363(2)

Union, see Credit union; Trade union

Unit

- defined, New Harmonized Value-added Tax System Regulations, No. 2, s. 1
- •• for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(1)
- • for investment plan HST rules re non-residents, 225.4(2); Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations ss. 1(1), 6(2)(a)

Unit trust, see also Distributed investment plan

- defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 1(2)
- constitutes listed financial institution, 149(1)(a)(ix), 149(5)(a)(xii)

United Nations

- · publications of
- • no GST on importation, VII-1
- no HST on bringing into participating province, X-I-1

United States, see also Foreign government

- air travel to, not zero-rated, VI-VII-1(1)"taxation area", VI-VII-3(a); Memo 28-3 para. 41
- based in Newfoundland, American Bases in Newfoundland Remission Order, 1990
- bridge or tunnel to, supplies for construction of zero-rated, VI-VIII-2
- courier import up to \$40 from, no tax on importation, VII-7.01
- currency, transactions in, 159; Memo 3-6
- joint projects with Canadian government, Joint Canada-United States Government Projects Remission Order
- temporary importations from
- • no GST on importation, VII-1
- no HST on bringing into participating province, X-I-8
- university in, whether a "university", Memo 20-3
- visiting forces, Visiting Forces (Part IX of the Excise Tax Act) Remission Order

University, *see also* Charity; Educational services; Public institution; Public sector body; Public service body

• athletic fees (mandatory), exempt, V-III-7.1; Memo 20-3

Urinary-sugar testing strips, reagents and tablets, zero-rated,

VI-II-29; Memo 4-2 para. 47

Use, see also Change in use of capital property

• in commercial activities

Topical Index

- • input tax credit for, 169(1), (2)
- •• method of determining, 141.01(5); Memo 8-3 paras. 33–49; Memo 700-5-1
- • financial institutions, 141.02
- • 90% or more deemed to be 100%, 123(1)"exclusive", 141(1)–(4)
- • real property that includes residential and non-residential portions, 141(5)

Used goods and used tangible personal property, Memo 400-3-6, *see also* Capital property; Supply

- export of, recovery of tax paid, 176(2) [repealed], 176(4.1) [repealed]
- FST inventory rebate for, 120(1)"tax-paid goods"(c), 120(3)(b)
- input tax credit on acquisition of, 176(1) [repealed]; TIB B-084
- jewellery, etc., see Used specified tangible personal property
- returnable containers, 176(1); TIB B-002, B-038
- · trade-in for new property
- • input tax credit to dealer, 176(1) [repealed]; TIB B-084
- • reduces consideration of new sale, 153(4), (5); TIB B-084
- used specified tangible personal property, see also Specified tangible personal property
- • defined, 123(1) [repealed]
- used tangible personal property defined, 123(1)

Used housing

 sale of, exempt, V-I-2, 3, 4, 5; Memo 19-2-1 paras. 20–39; Info Sheet GI-004

Used specified tangible personal property, Memo 400-3-6, *see also* Specified tangible personal property; Used goods and used tangible personal property

• defined, 123(1)"used tangible personal property"

Used tangible personal property, *see* Used goods and used tangible personal property

User fees

• exempt, 189.1

Usual place of residence (for non-resident e-commerce), 211.11

Utensils, designed for disabled persons

• zero-rated, VI-II-38; Memo 4-2 para. 56, 57

٧

VPI, see Virtual payment instrument

Vacant land

- last used as a residence, 123(1)"residential unit"(f)
- whether sale exempt, V-I-9; Memo 19-5 paras. 3–19; Info Sheet GI-003

Vacation credits

• for resorts outside Canada, Policy P-200R

University (cont'd)

- constitutes public institution or not, 123(1)"public institution"
- constitutes public sector body, 123(1)"public sector body"
- constitutes public service body, 123(1)"public service body"
- courses, V-III; Memo 20-3
- • diploma or degree, exempt, V-III-7
- • non-degree, program of two or more courses, exempt, V-III-
- • not exempt under general exemption for charities, V-VI-2(l), (m)
- • professional or trade accreditation, exempt, V-III-6
- • second language instruction, V-III-11
- • vocational, exempt, V-III-8
- defined, 123(1); Memo 20-3
- excluded from definition of *de minimis* financial institution, 149(4.1)(a)(i); Memo 17-7 para. 5
- exempt supplies, V-III, see also Educational services
- food services supplied to, exempt, V-III-14; Memo 20-5
- mandatory fees, exempt, V-III-7.1; Memo 20-3
- meal plan, exempt, V-III-13; Memo 20-5
- multiple capacities, apportionment of public service body rebate, 259(4.1), (7), (8)
- real property supplied by, V-VI-25
- rebate for printed books, 259.1; Memo 13-4
- rebate of 67% of GST paid, 259(1)"specified percentage"(d), 259(3)(a); TIB B-025; Memo 500-4-3
- rebate of percentage of provincial portion of HST paid, 259(1)"specified provincial percentage", 259(3)(b); *Public Service Body Rebate (GST/HST) Regulations* s. 5(c)(iv)
- student council fees, exempt, V-III-7.1; Memo 20-3
- student residence, see Student residence
- tuition, exempt, V-III-7, V-III-7.1; Memo 20-3

Unpaid municipal taxes and redemption by the previous owner, 183(10.1), Policy P-198

Unpaid debt. see Bad debts

Unreasonable. see Reasonable

Unrecoverable tax amount

 defined, for financial institution HST allocation rules, Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations s. 7(1)

Unregistered foreign carriers

supplies for use in international transportation, zero-rated, VI-V-2; Memo 4-5-2 paras. 21–25; Memo 4-5-3 paras. 27–31; Policy P-076

Unsatisfied debt for tax owing, directors of corporation liable, 323(2)(a), (6)

Unused total purchase credit

defined, 153(4.1)B(ii)B₁

Unvouchered meal expenses and employee rebates, Policy P-028 (obsolete)

Urinary appliance, zero-rated, VI-II-25, 26; Memo 4-2 paras.

Urinary catheter

• intermittent, zero-rated, VI-II-25.1

Urinary-ketone testing strips, reagents and tablets, zero-rated, VI-II-29; Memo 4-2 para. 47

Vacation properties

purchase, use and sale of, Info Sheet GI-025

Valour, medal or trophy won for

- no GST on importation, VII-2
- · no HST on bringing into participating province, X-I-11

Value, see also Dollar amounts in legislation and regulations

- appeal on question of, on importation of goods, 216(6)
- · consideration, of, see Consideration
- imported goods, of, for tax under Division III, 215; Value of Imported Goods (GST/HST) Regulations; TIB B-031
- market, see Fair market value
- not ascertainable, tax payable when ascertainable, 168(6); Memo 300-6-15
- passenger vehicle, limited to dollar cap for input tax credit, 201, 202(1); Memo 8-2 paras. 23–30

Value for duty

 defined, Value of Imported Goods (GST/HST) Regulations s. 2(1)

Van, see also Automobile; Freight transportation service; Motor vehicle

- conversion to accommodate wheelchair, zero-rated, VI-II-18.1
- converted for wheelchair, rebate, 258.1, 258.2; Info Sheet GI-199
- rented, temporary importation of by Canadian resident, calculation of tax, Value of Imported Goods (GST/HST) Regulations s. 15:A(a)(i)

Vancouver Olympics, see Olympic Games and Paralympic Games

Variation of agreement

- GST rate reduction anti-avoidance rules, 274.1, 274.11
- HST anti-avoidance rules, New Harmonized Value-added Tax Regulations ss. 35–36

Vegetables

- picker or harvester, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(b)(vii); Finance news release 93-039
- platters of, prepared, taxable, VI-III-1(o.3); Memo 4-3 paras. 114–118
- zero-rated, as food, VI-III-1; Memo 4-3 para. 5

Vegetation

 removing, cutting. pruning, treating or planting, exempt, V-VI-21.1(c)

Vehicle, see also Automobile; Motor vehicle; Specified motor vehicle

• fuel-inefficient, excise tax on, I-6

Vending machine, see also Coin-operated device

- food or beverages sold in
- • not exempt, in school cafeteria, V-III-12; Memo 20-5
- • taxable, VI-III-1(p); Memo 4-3 paras. 134–135
- • water, zero-rated, V-VI-23, VI-III-2; Info Sheet GI-011
- water sold in, zero-rated, V-VI-23, VI-III-2; Info Sheet GI-011

Vendor, see Supplier

Venture

- business, establishing in Canada, advisory services zero-rated, VI-V-9; Memo 4-5-3 paras. 51–54; Policy P-173
- in the nature of trade, see Adventure in the nature of trade

• joint, see Joint venture

Verification, see Audit

Vessel, see also Ship or boat

• defined, Value of Imported Goods (GST/HST) Regulations s. 2(1)

Veterans Affairs, Department of

• Vetcraft shop, supply of poppy or wreath, V-VI-27

Veterinary drugs, not zero-rated, VI-I-2; Memo 4-1 para. 5

Vice-President, see Officer

Video linkup, see Telecommunication service

Video games, calculation of tax, 165.1(2)

Video lottery terminal, see Gaming machine

Video poker, see Gaming machine

Village, see Municipality

Violin lessons, exempt, V-III-9; Equivalent Courses (GST/HST) Regulations; Memo 20-6; TIB B-014

Virtual payment instrument, see also Cryptoasset

- constitutes financial instrument, 123(1)"financial instrument"(f.1)
- defined, 123(1)
- · mining, see Cryptoasset

VISA fees to banks, taxable, 123(1)"financial service"(r.6)

Vision correction, see Eye: glasses

Visiting forces

- rebate for GST/HST paid, 261; Memo 18-3 paras. 19-22
- remission of GST, Visiting Forces (Part IX of the Excise Tax Act) Remission Order

Visitor Rebate Program

 before April 2007 or grandfathered, Info Sheet GI-026; Memo 27-3 Appendix E

Visitors to Canada, see also Non-resident

- · rebate for accommodation
- • before April 2007 or grandfathered, 252.1; Memo 27-3 Appendix E; Info Sheet GI-026
- paid before 2018, included in tour package, 252.1(2); Memo 27-3; Info Sheet GI-032
- rebate for exported goods before April 2007 or grandfathered, 252(1); Info Sheet GI-026

Visual artist, see Artist

Vitamins

• taxable, VI-III-1; Memo 4-3 paras. 21–23; Policy P-240; Info Sheet GI-001

Vocational school, *see also* Educational services; Technical institute

- courses, V-III; Memo 20-4
- • not exempt under general exemption for charities, V-VI-2(1)
- • professional or trade accreditation, exempt, V-III-6
- • vocational, exempt, V-III-8
- defined, V-III-1; Memo 20-4

Voice telephone

• considered telecommunication service, TIB B-090

Volume rebates or discounts, 181.1, 232(2)

Voluntary disclosure, Memo 500-3-4; Memo 16-5

Voluntary registration, *see* Registration (for GST/HST): voluntary

Voluntary transfer, see Quitclaim

Volunteers

- allowances paid to, by charity or public institution, 174(a)(iii); Memo 9-3; Policy P-075R
- certain activities of charities or other public sector body performed by, exempt, V-VI-3, 4, 5
- reimbursement of, by charity or public institution, 175; Memo 9-4; Policy P-075R

Voucher, see also Coupon

- · constitutes a record, 123(1)"record"
- for travel, see Ticket
- used as a coupon for discount, 181(1)

Vuruna case overruled, VI-VII-1(1)"freight transportation service"(a.1)

W

Wafer, of gold, silver or platinum, see Precious metal

• agricultural, zero-rated, VI-IV-10; Agriculture and Fishing Property (GST/HST) Regulations Sch:1(1)(g)(iv.1)

Waiver

- of obligation to file deceased's return, by Minister, 267.1(4)
- of penalty and interest by Minister, 281.1; Memo 16-3
- • wash transaction, TIB B-074; Memo 16-3
- • when demand for payment met on time, 280(7); Memo 16-2 para. 40(c)
- • when total under \$25, 280.2; TIB B-100; Memo 16-2 paras. 28, 40(b)
- of penalty for not providing information, by Minister, 284
- of reconsideration of assessment, to permit direct appeal to Tax Court, 301(4)
- of right to object to assessment
- • no appeal to Tax Court, 306.1(2)
- • no objection permitted, 301(1.6)
- of solicitor-client privilege, 293(15)
- of time limit for assessment, 298(7)
- • revocation, 298(8)

Walker for disabled person, zero-rated, VI-II-14; Memo 4-2 para. 22

War, see Munitions of war

Warehouse

- bonded, see Bond: goods held in
- storage charges, excluded from drop-shipment rules, 179(5)
- sufferance, see Sufferance warehouse services, zero-rated
- type "B", see Sufferance warehouse services, zero-rated

Warrant, see Search warrant

Warranty, see also Maintenance: contract

- · booklet, see Warranty booklet
- extended, taxable, 123(1)"insurance policy"(a)
- goods exported for repair under, no tax on importation, VII-8; Non-Taxable Imported Goods (GST/HST) Regulations s. 3(j)
- goods imported for repair under, Non-Taxable Imported Goods (GST/HST) Regulations s. 3(d)

- goods imported for repair or replacement under, no tax
- • where goods repaired, Non-Taxable Imported Goods (GST/HST) Regulations s. 3(d)
- • where goods replaced, VII-5.1
- new home, issued by insurer, Policy P-257
- parts in respect of warranty provided by non-resident, zero-rated, VI-V-13; Memo 4-5-2 paras. 43–45; Memo 4-5-3 paras.
- payment under, not a financial service, 123(1)"financial service"(n)
- product, taxable, 123(1)"insurance policy"(a)
- real property, taxable, 123(1)"insurance policy"(a)
- reimbursement, input tax credit, 175.1
- repair services performed outside Canada, VII-5 (Analysis)
- · replacement parts
- • no GST on importation, VII-5
- • no HST on bringing into participating province, X-I-14
- supplied to non-resident, zero-rated, VI-V-13; Memo 4-5-2 paras. 43–45; Memo 4-5-3 paras. 55–57
- service in respect of warranty provided by non-resident, zerorated, VI-V-13; Memo 4-5-3 paras. 55-57

Warranty booklet

- excluded from printed books rebate, 259.1(1)"printed book"(f)
- meaning of, Policy P-227 (obsolete)

Wash transaction

- overclaim of input tax credit on, 296(4)(a)
- waiver of penalty and interest above 4% of tax, 281.1; TIB B-074; Memo 16-3

Washing machine

• in residential complex, exempt, V-I-13.3; Memo 19-2-2 paras. 23-24

Waste disposal

• joint venture election, *Joint Venture (GST/HST) Regulations* s. 3(1)(i)

Watches and clocks

• excise tax on, I-5(a); Memo 800-1

Water, Info Sheet GI-022

- bottled for human consumption, zero-rated as food, VI-III-1
- continuous supply of, see Continuous supply (electricity, gas, etc.)
- delivery charges, exempt, V-VI-23; Info Sheet GI-011
- distribution system, installation and maintenance by municipality, exempt, V-VI-22
- drinking, zero-rated, V-VI-23, VI-III-1(r), VI-III-2, Memo 4-3 paras. 35–42; Info Sheet GI-022
- ferrying over, exempt or zero-rated, V-VIII-1, VI-VII-14; Memo 28-1
- fruit-flavoured, taxable, VI-III-1(d); Memo 4-3 para. 41
- haulers, see Water haulers
- removal by municipality, exempt, V-VI-21.1(b)
- resources, rights to take, 146(c), 162, V-VI-20(k); Policy P-110R
- spring, single serving taxable, VI-III-1(n); Memo 4-3 para. 32;
 Info Sheet GI-022
- unbottled
- • exempt, V-VI-23; Info Sheet GI-011
- zero-rated, VI-III-1(r), VI-III-2; Memo 4-3 paras. 35–42; Info Sheet GI-022

Water haulers

· supplies exempt, V-VI-23; Info Sheet GI-011

Web site access charges

• characterization as service or intangible property, TIB B-090

Web site hosting

- characterization as service or intangible property, TIB B-090
- excluded from recapture of Ontario/BC HST ITCs, New Harmonized Value-added Tax System Regulations, No. 2, s. 28(2)(e)
- zero-rated as exported service, VI-V-7; TIB B-090

Wedding cake, whether zero-rated, Memo 4-3 para. 100

Weed cutting service, by municipality, exempt, V-VI-21; Policy P-177R

Week

 calculation of, part-week included, Value of Imported Goods (GST/HST) Regulations, s. 2(2)

Well, see Oil or gas well

Wharf rentals for floating home, exempt, V-I-13.2; Memo 19-2-2 para. 22

Wheelchair, zero-rated, VI-II-14; Memo 4-2 para. 22

- lift, zero-rated, VI-II-14; Memo 4-2 para. 22
- ramp, zero-rated, VI-II-16, VI-II-17; Memo 4-2 paras. 24, 25
- · vehicle converted to accommodate
- • conversion zero-rated, VI-II-18.1; Memo 4-2 paras. 27, 28
- • lease of vehicle, reduced GST, 258.1(7); Info Sheet GI-199
- • rebate of part of GST on importation, 258.1(6), 258.2; Info Sheet GI-199
- rebate of part of GST on purchase, 258.1(2)–(5); Info Sheet GL-199

When tax payable, see Time: tax payable

Wholesale auctions, 177(1.3)

Wholesaler, see Licensed wholesaler

Wild birds, feed for not zero-rated, VI-IV-2

Wild rice, see Water: products grown in

Wild turkeys

• zero-rated, VI-IV-1; Memo 4-4 para. 5

Wildlife park, see Place of amusement

Wilful default or failure, see Offences; Penalties

Wind power

 generation or evaluation of, right to use land deemed not a supply, 162(2)(d)

Winding-up of corporation, 272, *see also* Corporation; Receiver

- cancellation of registration, 242; Memo 2-7 para. 3(d)
- certificate before distribution of property, 270
- effect on ITC allocation method of financial institution, 141.02(5)
- liquidator appointed to carry out, constitutes receiver, 266(1)"receiver"(d)
- non-financial institution into financial institution, 205(7)
- where 90% or more owned by parent corporation, 272, Amalgamations and Windings-Up Continuation (GST/HST) Regulations; TIB B-007

Wine, see also Alcoholic beverages

- · de-alcoholized, taxable, Policy P-081R
- excise taxes on, 27; Memo 800-1, 800-4

Winnings, see Bets; Prizes

Winnipeg Commodity Exchange, Memo 17-1 para. 37

Wire, supply by means of, see Continuous supply (electricity, gas, etc.)

Withdrawal of tax collected from trust, 222(2)

Witnesses, at inquiry, rights of, 276(5)

Wood

- processing facility, joint venture election, *Joint Venture* (GST/HST) Regulations s. 3(1)(p)
- stumpage fees, no tax, 162(1)
- taxable, Memo 4-4 para. 2

Wool

- livestock used to produce, zero-rated, VI-IV-1; Memo 4-4 para. 4
- not further processed than washed, zero-rated, VI-IV-6; Memo 4-4 para. 32
- processed, taxable, Memo 4-4 para. 2

Work of art, see Specified tangible personal property

Work site, see Remote work site

Work space in home, see Home office expenses

Working interest

• in mine or oil or gas well, supply of, Policy P-128R2

Wreaths, see Poppies and wreaths (for Remembrance Day)

Writer, see Author

Writing, see also Agreement

- defined, Interpretation Act s. 35(1)
- document not required to be in, 123(1)"record"

Writing off

- bad debt, see Bad debts
- interest, by Minister, 280.2, 281.1; TIB B-100; Memo 16-2, 16-3
- inventory, ineligible for FST inventory rebate, 120(1)"tax-paid goods"

X

X-ray services, see Radiological services

Υ

Yacht

• lease of by non-resident, whether taxable, Policy P-193R

Year, see also Calendar year; Fiscal year; Taxation year

• defined, Interpretation Act 37(1)

Yeshiva, see School

Yoghurt

- drinks, Memo 4-3 paras. 21, 32; Info Sheet GI-036
- frozen, see Frozen yoghurt, single serving taxable
- single servings, zero-rated, VI-III-1(n); Memo 4-3 para. 73
- zero-rated, VI-III-1

Yukon

- tax payable by Indians, Memo 3-1 paras. 11-12
- territorial government entities that pay no GST, 122 (Analysis); Memo 18-2 paras. 26–28

Ζ

Zapper software (or hardware)

- · use, possession, manufacture or sale of
- • administrative penalty, 285.01
- ••• no limitation period for assessment, 298(1)(e)
- • criminal offence, 327.1

Zero-emission passenger vehicle

- included in "passenger vehicle", 123(1)"passenger vehicle"
- input tax credit limited to GST/HST on \$55,000, 201(b)A

Zero-rated supplies, Sch. VI; Memo 300-3

- agriculture, VI-IV; Memo 4-4
- basic groceries, VI-III; Memo 4-3

- defined, 123(1)
- exports, VI-V; Memo 4-5.2; Memo 4-5-3, see also Exports
- ferry services, VI-VII-14; Memo 28-1
- financial services exported, VI-IX; Memo 300-3-9
- fishing, VI-IV; Memo 4-4; Info Sheet GI-049
- food, VI-III; Memo 4-3
- freight transportation, VI-VII; Memo 28-2
- international organizations and officials, VI-VIII; Memo 18-3
- medical devices, VI-II; Memo 4-2
- no GST on importation of most, VII-6
- no HST on bringing into participating province, X-I-15, X-II-2
- passenger transportation, VI-VII; Memo 28-3
- prescription drugs, VI-I; Memo 4-1
- taxed at 0%, 165(3)
- tour package, non-taxable portion, VI-VI; Memo 27-1

Zoning of property

• information or certificate exempt, V-VI-20(e)(iii)