

INDEX

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

A

- AAII**, *see* Adjusted aggregate investment income
- ABIL**, *see* Allowable business investment loss
- ACB**, *see* Adjusted cost base
- ACB reduction**
- defined, for small business investment capital gain rollover, 44.1(1)
- ADR**, *see* American Depositary Receipt
- AET**, *see* Alter ego trust
- AFB**, *see* Authorized foreign bank
- AGRA**, *see* Allocated group ratio amount
- AIP**, *see* Accelerated investment incentive property
- AIP**, *see* Accumulated income payment
- ALDA**, *see* Advanced life deferred annuity
- ALDA dollar limit**
- defined, 205(1)
- AML/KYC procedures**
- defined, for Common Reporting Standard, 270(1)“anti-money laundering and know your customer procedures”
- AMT (Alternative Minimum Tax)**, *see* Minimum tax
- APA**, *see* Advance Pricing Agreement
- ASPA**, *see* Adjusted stub period accrual
- ATI**, *see* Adjusted taxable income
- ATIP (Access to information and privacy)**, 241(1) (Notes)
- AVC**, *see* Additional voluntary contribution (AVC) [to pension plan]
- Abatement of tax**
- corporations, 124(1)
 - manufacturing and processing credit, 125.1
 - small business deduction, 125
 - individuals, re provincial schooling allowance, 120(2), Reg. 6401
- Abeyance letter**, 225.1(5)
- Aboriginal government**
- defined, re disclosure of taxpayer information, 241(10)
- Aboriginal peoples**, *see* Indian
- Absconding taxpayer**, 226
- Absorbed capacity**
- defined, for interest deduction restrictions, 18.2(1), 248(1)
 - reduces limitation on interest expense, 18.2(2)E
- Absorbed capacity year**
- defined, 18.2(1)“cumulative unused excess capacity”(b)(ii)
- Absorptive merger of foreign corporations**
- qualifies as foreign merger, 87(8.2)
- Accelerated Canadian development expense**
- deduction for, 66.2(2)(d)
 - defined, 66.2(5)
- Accelerated Canadian oil and gas property expense**
- deduction for, 66.4(2)(c)
 - defined, 66.4(5)
- Accelerated investment incentive property**
- defined, Reg. 1104(4)
 - fast writeoff, Reg. 1100(2)A
 - Canadian vessel, Reg. 1100(1)(v)(iv)(A)
 - Class 13, Reg. 1100(1)(b)(i)(A)
 - Class 14, Reg. 1100(1)(c)(i)(B)
 - Class 43 (after 2025), Reg. 1100(2)A(d)
 - Class 43.1, Reg. 1100(2)A(b)
 - Class 43.2, Reg. 1100(2)A(c)
 - Class 53, Reg. 1100(2)A(d)
- Acceleration clause exercised by creditor**, 20(1)(n)
- Acceptable accounting standards**
- defined, 18.21(1)
- Access road**
- access rights to, 13(7.5)(c)
 - forest, Reg. Sch. II:Cl. 10(p)
- Access to information**, 241(1) (Notes)
- Accident and sickness insurance**
- defined, for insurers’ policy reserves, Reg. 1408(1)
- Accident claims**, *see also* Accident insurance plan
- motor vehicle, payments exempt, 81(1)(q), Reg. 6501
- Accident insurance plan**
- death coverage is not group life insurance, Reg. 2700(2)
 - employer’s contribution not a taxable benefit, 6(1)(a)(i)
 - payment to employee under, taxable, 6(1)(f), ITAR 19
- Account holder**
- defined, for Common Reporting Standard, 270(1)
- Accountant**, *see also* Professional practice
- examination fees to qualify as, tuition credit, 118.5(1)(d)
 - penalty for misrepresentation by, 163.2
- Accounting**
- accrual method for professionals until 2017, 34
 - transitional rule 2017–2020, 10(14.1)
 - branch
 - insurer, by, 138(9)
 - cash method for farming or fishing business, 28(1)–(3)
 - consolidation method prohibited, 61.3(1)(b)C(i), 248(24)
 - equity method prohibited, 61.3(1)(b)C(i), 248(24)
 - functional currency reporting, 261
 - records, not protected by solicitor-client privilege, 232(1)“solicitor-client privilege”
 - rule changes for insurers (2023), 138(16)–(25), 142.51
 - securities held by financial institutions, 142.2–142.6
- Accounts**
- contingent, limitation on deductibility, 18(1)(e)
 - factoring of, *see* Factoring of accounts
 - penalty for failure to keep, 238(1), 239(1)(b)
 - receivable, *see* Accounts receivable
 - separate, for tax deductions
 - penalty for default, 238(1)
 - tax, transfers of payments among, 211.2
 - to be kept, 230(1)
- Accounts receivable**
- bad, *see* Bad debt
 - ceasing to carry on business, on, 28(5)
 - doubtful, reserve for, 12(1)(d), 20(1)(l)
 - factoring of, *see* Factoring of accounts
 - sale of, 22
- Accredited film or video production certificate**, 125.5(1)
- Accredited production**
- defined, for film/video production services credit, 125.5(1), Reg. 9300

Accrual method of reporting income

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

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

Accrued return (from specified debt obligation)

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

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

Accumulated 1968 deficit

- defined, 219(7)

Accumulated overpayment amount

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

Accumulated PSPA

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

Accumulated underpayment amount

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

Accumulating fund

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

Accumulating income (of trust)

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

Accumulation of property

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

Acquired affiliate

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

Acquired for consideration

- meaning of, 108(7)

Acquiror (re butterfly transactions)

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

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

Act, *see also* Legislation

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

Acting services, *see* Actor

Action, *see also* Offences

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

Active asset

- defined, 125(7)

Active Biotech spinoff, Reg. 5600(a)

Active business, *see also* Small business deduction

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

Active business corporation

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

Active member

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

Active NFE

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

Active partner, *see* Partner

Active seller

- defined, for digital platform operator reporting rules, 282(1)

Active trade or business

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

Actor

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

Actor payment, defined, 212(5.2)

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

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

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

Actuarial surplus

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

Actuary

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

Additional tax

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

Additional voluntary contribution (AVC) [to pension plan]

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

Address

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

Adjusted aggregate investment income

- defined, 125(7)

Adjusted amounts

- defined, for transfer pricing rules, 247(2.02)

Adjusted business income

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

Adjusted cost base, *see also* Property

- bond or debt obligation, 53(1)(g), (g.1), 53(2)(l), (l.1), (q)
- computing
 - amounts to be added, 53(1)
 - amounts to be deducted, 53(2)
 - reduction for assistance received, 53(2)(k)
 - reduction on debt forgiveness, 53(2)(g.1), 80(9)–(11)
- debts
 - owing by predecessor corporation, 87(6), (6.1), (7); ITAR 26(23)
- defined, 54
- excessive election for capital gains exemption, 53(2)(v)
- expropriation asset, 53(1)(k), 53(2)(n)

Index

Adjusted cost base (*cont'd*)

- farmland, 53(1)(i)
- flow-through entity, 53(1)(p)
- identical properties, 47(1)(c), (d); ITAR 26(8)
- indexed debt obligation, 53(1)(g.1), 53(2)(l.1)
- land, 53(1)(h), (i)
- negative, deemed gain, 40(3), (3.1)
- offshore investment fund property, 53(1)(m)
- option, of, 53(2)(g.1)
- • reduction flowed through to share, partnership interest or trust interest, 49(3.01)
- • to acquire share of predecessor, reduction on amalgamation, 87(5.1)
- partnership interest, 40(3.1), 53(1)(e), 53(2)(c), (g.1); ITAR 26(9)
- partnership property, right to receive, 53(2)(o)
- property owned since before 1972, ITAR 26(3)
- shares, 53(1)(b), (c), (d), (d.3), (f.2), (j), 53(2)(a), (b), (e), (f.1), (g.1)
- • right to acquire by deceased's estate under employee stock option agreement, 53(2)(t)
- substituted property, 53(1)(f)
- surveying costs, 53(1)(n)
- trust interest, 53(1)(d.1), (d.2), (l), 53(2)(b.1), (g.1), (h), (i), (j), (q)
- valuation costs, 53(1)(n)

Adjusted cost basis, defined, 148(9)

Adjusted cumulative foreign resource expense

- defined, 66.21(1)

Adjusted income

- defined
- • for Canada Child Benefit, 122.6
- • for Canada Disability Savings Grant, *CDS Act*, s. 2(2) (in Notes to 146.4)
- • for Canada Education Savings Grant, *CES Act*, s. 2(2) (in Notes to 146.1)
- • for GST credit, 122.5(1)
- • for old age security clawback, 180.2(1)
- • for refundable medical expense credit, 122.51(1), 122.6

Adjusted principal amount, defined, 80.1(7)

- property disposed of at other than arm's length, ITAR 26(5)
- property owned on Dec. 31/71, ITAR 26(3), (4)

Adjusted purchase price

- of interest in annuity contract, defined, Reg. 300(3), (4), 310

Adjusted selling cost (re investment tax credits)

- defined, 127(11.7)
- effect on qualified expenditures, 127(11.6)(d)(ii)

Adjusted service cost (re investment tax credits)

- defined, 127(11.7)
- effect on qualified expenditures, 127(11.6)(c)(ii)

Adjusted stub period accrual (corporate inclusion of partnership income)

- deduction in year following inclusion, 34.2(4)
- defined, 34.2(1)
- included in corporation's income, 34.2(2)
- • inclusion for new partner, 34.2(3)
- optional reduction in income inclusion, 34.2(1)"adjusted stub period accrual"(a)F
- reserve for qualifying transitional income, 34.2(11)

Adjusted taxable income

- defined
- • for Alternative Minimum Tax, 127.52
- • for GRIP calculation, 89(1)
- • for interest deduction restrictions, 18.2(1)
- interest expense limited to 30% of, for certain corps, 18.2(2)B(b)

Adjustment

- at-risk, *see* At-risk adjustment (for tax shelter)

- capital setoff, *see* Transfer pricing capital setoff adjustment
- defined, for transfer pricing rules, 247(2.02)
- income setoff, *see* Transfer pricing income setoff adjustment
- inflation, for, *see* Indexing (for inflation)
- inventory, *see* Inventory: adjustment
- unpaid claims reserve, 20(4.2)

Adjustment amount

- defined, for FAPI surplus rules, Reg. 5905(7.7)

Adjustment time

- defined, for FAPI surplus rules, Reg. 5905(7.2)

Administration fee

- paid to non-resident, 212(1)(a)
- • defined, 212(4)

Administration of Act, 220–244

Administrator, *see also* Legal representative

- deemed to be legal representative, 248(1)"legal representative"
- defined
- • for government-sponsored retirement arrangements, Reg. 8308.4(1)
- • for pooled registered pension plan, 147.5(1)
- estate, *see* Executor
- obligations of, 159
- registered pension plan, *see* Registered pension plan: administrator
- return required by, 150(3)

Adoption expenses

- tax credit, 118.01

Adoption period

- defined, 118.01(1)

Adult basic education

- deduction for financial assistance, 110(1)(g)

Advance Pricing Agreement

- transfer pricing, 247

Advanced life deferred annuity, 146.5

- cumulative excess amount, tax on, 205
- death benefit, taxable, 146.5(3)
- • rollover to RRSP etc. of spouse, child or grandchild, 60(1)(v)(A.2)
- defined, 146.5(1), 248(1)
- dollar limit, defined, 205(1)"ALDA dollar limit"
- excessive transfer to, tax on, 205
- non-resident withholding tax, 212(1)(l.1)
- payments from
- • included in income, 56(1)(z.5), 146.5(2)
- • not taxed as regular annuity payments, 56(1)(d)(iv)
- • withholding of tax at source
- • • non-resident payee, 212(1)(l.1)
- • • resident payee, 153(1)(u)
- qualified investment for RRIF, 146.3(1)"qualified investment"(b.3)
- qualified investment for RRSP, 146(1)"qualified investment"(c.3)
- transfer from
- • to RRIF, 146.3(2)(c)(ix)
- • to RRSP, 146(16)(a.1)
- transfer to
- • from DPSP, 147(19)(d)(v)
- • from PRPP, 147.5(21)(c)(vi)
- • from RPP, 147.3(1)(c)(iv)
- • from RRIF, 146.3(14.1)(c)
- • from RRSP, 146.3(16)(a.1)
- withholding tax, *see* payments from (above)

Advantage

- charitable donation or political contribution
- defined, 248(32)
- • reduces eligible amount for donation or contribution credit, 248(31)

Index

- Advantage (*cont'd*)
 - RCA
 - defined, 207.5(1)
 - limitation on RCA election, 207.5(3)
 - tax on, 207.62
 - RRSP, RRIF, TFSA, RESP or RDSP
 - defined, 207.01(1)
 - tax on, 207.05
- Adventure in the nature of trade**
 - constitutes business, 248(1)“business”
 - deemed carried on by corporation or trust, 10(11)
 - inventory held in, no writedown until sale, 10(1.01), (9), (10)
 - superficial loss not deductible, 18(14)–(16)
- Advertisement directed at the Canadian market**
 - defined, 19.01(1)
- Advertising**
 - expenses, limitation on deductibility
 - foreign broadcasting media, 19.1
 - foreign (other than U.S.) periodicals, 19
 - materials
 - deemed to be inventory, 10(5)
 - valuation of, 10(4)
 - show, ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(ix)
 - show, ineligible for film/video production services credit, Reg. 9300(2)(i)
 - signs and posters, capital cost allowance, Reg. Sch. II:Cl. 11
- Advisor**
 - defined
 - for notifiable-transaction rules, 237.4(1)
 - for reportable-transaction rules, 237.3(1)
- Advisory committee, dues paid by employee, deduction,** 8(1)(i)(vi)
- Advocate (in Quebec),** *see* Lawyer
- Aeronautics Act, compensation under, exemption,** 81(1)(d)
- Aeroplane,** *see* Aircraft
- Affiliate,** *see* Affiliated person; Foreign affiliate; Subsidiary
- Affiliate share**
 - defined, 93(2)(a), (b), 93(2.1)(a), (b), 93(2.2)(a), (b), 93(2.3)(a), (b)
- Affiliate taxation year**
 - defined, for interest deduction restrictions, 18.2(1)
- Affiliate year**
 - defined, for artificial foreign tax credit generator rules, 91(4.1)
- Affiliated**
 - defined
 - changed meaning for trust loss trading rules, 251.2(5)
- Affiliated counterparty**
 - defined, for synthetic equity arrangement rules, 112(2.32)(a)
- Affiliated person**
 - acquisition of capital property by, 40(3.3), (3.4)
 - acquisition of depreciable property by, 13(21.2)
 - acquisition of inventory by
 - previously held as adventure in nature of trade, 18(14)–(16)
 - previously held by financial institution, 18(13), (15)
 - defined, 251.1
- Affiliated specified counterparty**
 - defined, for synthetic equity arrangement rules, 112(2.32)(b)(ii)(A)(II)
- African Development Bank**
 - bonds of, qualified investment for RRSP etc., 204“qualified investment”(c.1) (formerly Reg. 4900(1)(l)(vi))
- Age**
 - 6
 - under
 - Canada Child Benefit enhanced, 122.61(1)A:E(a)
 - 7
 - under
 - child care expenses, 63(3)“annual child care expense amount”(b)(i)
 - 16
 - under
 - child care expenses, 63(3)“eligible child”(c)
 - tuition credit disallowed, 118.5(1)(a)(ii.2)(A)
 - 18
 - over
 - RRSP overcontribution of \$2,000 allowed, 204.2(1.1)(b)C
 - where income-splitting tax does not apply, 120.4(1)“excluded amount”(e), (f)
 - under, *see* Child; Minor
 - 19
 - over, GST credit, 122.5(1)“eligible individual”(b)
 - under
 - dependant for pension purposes, Reg. 8500(1)“dependant”(a)
 - dependent child, 70(10)“child”(c), 252(1)(b)
 - parent or caregiver to be notified of RESP, 146.1(2)(1)
 - 21
 - over
 - accumulated income payments from RESP, 146.1(2)(d.1)(iii)(A)
 - under
 - contributions to RESP, 146.1(2)(j)(ii)(A), (iii)(A)
 - dependent child, ITAR 20(1.11)(c), 26(20)(c)
 - income from personal injury award exempt, 81(1)(g.1), (g.2), 81(5)
 - transfer of RESP beneficiary, 204.9(4)(b), 204.9(5)(c)(ii)
 - trust for, whether amounts payable, 104(18)(b)
 - 25
 - over
 - where income-splitting tax does not apply, 120.4(1)“excluded amount”(a), (g)
 - under
 - income-splitting tax
 - joint liability with related person, 160(1.2)
 - 27
 - effect on registered disability savings plan, 146.4(4)(n)(iii)
 - 40
 - under, trust for, whether amounts payable, 104(18)(d)
 - 55
 - additional lifetime retirement benefits, Reg. 8505(3)
 - early retirement pension benefits, Reg. 8503(3)(c)(i)(A)
 - 59
 - effect on registered disability savings plan, 146.4(4)(n)(ii), (8)(d)
 - 60
 - early retirement pension benefits, Reg. 8503(3)(c)(ii)(A)
 - pension bridging benefits, Reg. 8503(2)(b)(ii)B(A)
 - registered disability savings plan, contributions stop, 146.4(4)(g)(i)
 - 65
 - over
 - home accessibility tax credit, 118.041(1)“qualifying individual”(a)
 - in-home care of, caregiver credit (before 2017), 118(1)B(c.1)(iii)(A)
 - normalized pension, lifetime retirement benefits, Reg. 8302(3)(b), (n), 8303(5)(b), 8503(2)(e)(vi)B, 8503(3)(d)(ii)B, 8504(10)(b), 8517(5)(b)
 - pension bridging benefits, Reg. 8503(2)(b)(i), (ii)A(A), 8506(1)(b)
 - pension credit, 118(3)
 - re-employment of member of pension plan, Reg. 8503(9)(b)(iv)
 - restricted-funding member of pension plan, Reg. 8515(7)(e)(i)
 - sale of LSVCC shares, 211.8(1)(a)B(i)(A)

- Age (cont'd)*
- specified retirement arrangement, Reg. 8308.3(1)(c)
 - spouse, income-splitting tax inapplicable, 120.4(1.1)(c)(i)(B)
 - trust for self, 248(1)“alter ego trust”
 - trust for self and spouse, 248(1)“joint spouse trust”
 - under
 - pension plan, retirement benefits, Reg. 8504(5)
 - 71
 - conversion of pension rights to annuity contract, Reg. 8502(e)(i)
 - conversion of RRSP to RRIF or annuity, 146(2)(b.4)
 - expiry of FHSA eligibility, 146.6(1)“maximum participation period”(b)(ii)
 - maturation of deferred profit sharing plan, 147(2)(k), 147(10.6)
 - pre-retirement surviving spouse benefits, Reg. 8506(1)(e)(iii)
 - pre-retirement survivor benefits, Reg. 8503(2)(f)(iii)(B)
 - 75
 - payments after, annuity contract issued before 1978, 20(2.2)
 - 80
 - effect on registered disability savings plan, 146.4(4)(l)B
 - 85
 - exempt life insurance policy, Reg. 310“endowment date”(a)(ii)
 - 90
 - annuity to, 146(1)“qualified investment”(c.2)(v)(B), 146.3(1)“qualified investment”(b.2)(v)(B)
 - 91
 - reaching, prescribed annuity contract, Reg. 304(1)(c)(iv)(C), 304(2)(b)
 - 94
 - RRIF payout levels out at 20%, 146.3(1)“minimum amount”
 - under 18, *see* Minor
- Agent**
- administering property, return by, 150(3)
 - insurance, reserves for, 32(1)
 - liability for non-resident tax, 215(2)
 - paid by commission, deductions allowed, 8(1)(f)
 - certificate of employer, 8(10)
 - receiving income on behalf of non-resident, 215(1), (3)
 - trustee acting as, 104(1), *see also* Bare trust
 - ceasing to act, 248(1)“disposition”(b)(v)
- Aggregate investment income**
- defined, 129(4), 248(1)
 - refund to private corporation of 30²/₃%, 129(4)“non-eligible refundable dividend tax on hand”(a)(i)A
- Aggregate participating percentage**
- defined, 91(1.3)
 - for interest deduction restrictions, 18.2(1)
- Agreement**
- among associated/related corporations
 - to allocate base level deduction re soft costs on land, 18(2.3)
 - to allocate capital deduction among financial institutions, 190.15(2)
 - to allocate dividend allowance for Part VI.1 tax, 191.1(3)
 - to allocate ITC expenditure limit, 127(20)
 - to allocate reduction in ITC due to government assistance, 127(20)
 - to allocate small business deduction, 125(3)
 - to transfer SR&ED qualified expenditure pool, 127(13)–(17)
 - collection agreement with provinces, 228
 - competent authority, deemed valid, 115.1
 - for payment of unreasonably low rent
 - effect on proceeds of disposition of property, 69(1.2)
 - for payment without withholding tax, void, 227(12)
 - not to compete, *see* Restrictive covenant (or non-competition payment)
 - to issue shares to employee, 7
 - to transfer forgiven amount of debt to related person, 80.04
- Agreement for sale**
- included in proceeds of disposition, 20(5), (5.1)
- Agricultural business**
- defined, 135.1(1)
- Agricultural cooperative corporation**
- defined, 135.1(1)
 - tax-deferred patronage dividends, 135.1
- Agricultural equipment technician**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Agricultural land, *see* Farm land**
- Agricultural organization**
- exemption, 149(1)(e), 149(2)
 - information return, whether required, 149
- Agri-Quebec programs**
- prescribed for farm income stabilization, Reg. 5503
- Air Canada**
- pension underfunding trust, Reg. 6802(h)(i), 8502(b)(v.1)
 - subject to tax, 27(2), Reg. 7100
- Air conditioner**
- medical expense credit for, Reg. 5700(c.3)
- Air navigation equipment**
- lease of, non-resident withholding tax exemption, 212(1)(d)(xi)(D)
- Air purifier**
- medical expense credit for, Reg. 5700(c.1)
- Air quality improvement credit, 127.43**
- amalgamation, effect of, 127.43(5)
 - regulations, Reg. 9700
- Air-source heat pump**
- qualified for enhanced CCA, Reg. Sch. II:Cl. 43.1(d)(i)(A)(III)
 - qualifies for ZETM deduction, Reg. 5202“qualified zero-emission technology manufacturing activities”(a)(i)(E.1)
- Air traffic control operations, *see* Nav Canada**
- Air traffic controller**
- pension accrual to retire early, *see* Public safety occupation
- AirBNB**
- reporting of rentals by property owners, 282–295
- Aircraft**
- available-for-use rule, 13(27)(h)
 - broadcasting from, 19.1(4)“foreign broadcasting undertaking”
 - capital cost allowance, Reg. Sch. II:Cl. 9(g)–(i), Sch. II:Cl. 16(a)–(c)
 - capital tax exemption, Canada-U.S. Tax Treaty:Art. XXIII:3
 - component manufacturer
 - exception to thin capitalization rules, 18(8) [repealed]
 - cost over \$100,000, *see* Luxury Items Tax
 - employment, used in
 - costs, 8(1)(j), 8(9)
 - employment by U.S. resident on, Canada-U.S. Tax Treaty:Art. XV:3
 - food consumed or entertainment enjoyed on, 67.1(4)(a)
 - fuel tax rebate, *see* Fuel tax rebate
 - GST input tax credit in respect of, 248(17)
 - hangar, capital cost allowance, Reg. Sch. II:Cl. 6(h)
 - international traffic, used in
 - income of non-resident exempt, 81(1)(c)
 - lease payments, non-resident withholding tax exemption, 212(1)(d)(xi)
 - manufacturer or developer of
 - exception to thin capitalization rules, 18(8) [repealed]
 - non-resident’s income from, exempt, 81(1)(c)
 - pilot
 - away-from-home expenses, 8(1)(g)
 - non-resident, Canadian income calculation, 115(3)

Index

- Aircraft (*cont'd*)
- pension accrual to retire early, *see* Public safety occupation
 - QST input tax refund in respect of, 248(17)
 - runway, capital cost allowance, Reg. Sch. II:Cl. 1(g), Sch. II:Cl. 17(c)
 - for mine, Reg. Sch. II:Cl. 10(l)(ii)
 - used in international traffic, *see* International traffic
- Airline corporations**
- aviation fuel tax rebate, *see* Fuel tax rebate
 - taxable income earned in a province, Reg. 407
- Airline pilot**, *see* Aircraft: pilot
- Airplane**, *see* Aircraft
- Airport, for mine, capital cost allowance**, Reg. Sch. II:Cl. 10(l)(i)
- Airports relief (COVID)**, Reg. 8901.1(2)(b)(xvii), *see also* Qualifying tourism or hospitality entity
- Alarm**
- for infant prone to sudden infant death syndrome, medical expense, Reg. 5700(r)
- Alberta**, *see also* Province; *Investing in a Diversified Alberta Economy Act*
- labour-sponsored venture capital corporation of
 - prescribed, Reg. 6700(a)(v)
 - northern, *see* Northern Canada
 - prescribed stock savings plan, Reg. 6705(a)
 - tax rates, *see* introductory pages
 - unlimited liability company, *see* Nova Scotia: unlimited liability company
- Alberta Royalty Tax Credit**
- transitional relief, 12(1)(x.2) (application phase-in)
- Alberta Stock Exchange**
- prescribed stock exchange, 262
- Alcatel case overruled**, 143.3
- Alex Parallel Computers case overruled**, 220(2.2)
- Algoa Trust case overruled**, 160(1) closing words, 160(1.1) closing words
- Alimony**, *see* Support payments (spousal or child)
- All or substantially all**
- meaning of, 66.6 (Notes)
- Allied war veterans**
- death or disability pension exempt, 81(1)(e)
- Allocable amount (for preferred beneficiary election)**
- defined, 104(15)
 - election to include in beneficiary's income, 104(14)
- Allocated amount**
- defined, for mutual fund rules re allocation to redeemers, 132(5.3)
- Allocated group ratio amount**
- determined, for interest deduction EIFEL rules, 18.21(3)
- Allocation**, *see also* Apportionment
- allocation in proportion to patronage, *see* Patronage
 - borrowing, in proportion to, *see also* Borrowing
 - by Minister, where associated corporations do not file agreement
 - base level deduction, for soft costs on land, 18(2.4)
 - dividend allowance, for Part VI.1 tax, 191.1(5)
 - expenditure limit, for investment tax credit, 127(10.4)
 - coal mine depletion allowance, 65(3)
 - consideration, where combined transfer of property, 13(33), 68
 - credits between spouses, *see* Splitting, sharing or apportionment
 - foreign tax credit, by trust to beneficiary, 104(22)–(22.4)
 - income of trust, to beneficiaries
 - capital gains, 104(21)–(21.7)
 - dividends, 104(19), (20)
 - preferred beneficiary election, 104(13)
 - liability for debt obligation, 80(2)(o)
 - partnership income among partners, 103
 - patronage, in proportion to, *see* Patronage
 - proceeds
 - between land and building, 13(21.1), 70(5)(d)
 - between property and services, 68
- Allowable business investment loss**, *see also* Business investment loss
- capital gains exemption, interaction with, 39(9), 110.6(1)“annual gains limit”B(b), 110.6(1)“cumulative gains limit”(b)
 - carryforward, 111(1)(a), 111(8)“non-capital loss”
 - reduction on debt forgiveness, 80(4)(a)
 - deduction, 3(d)
 - defined, 38(c)
 - partnership, of, 96(1.7)
- Allowable capital loss**, *see* Capital loss
- Allowable disposition**
- defined, for agricultural cooperatives, 135.1(1)
- Allowable refund**
- defined
 - for tax on registered plans, 207.01(1)
- Allowance**
- capital cost, *see* Capital cost allowance
 - clergyman's, not taxable, 6(1)(b)(vi)
 - defined
 - capital cost, 20(1)(a), Reg. 1100, *see also* Capital cost allowance
 - for alimony, maintenance, child support, 56(12)
 - for employee benefits, reasonable, 6(1)(b)(x), (xi)
 - retiring, 248(1), *see also* Retiring allowance
 - depletion, *see* Depletion allowances
 - depreciable property, *see* Capital cost allowance
 - disabled employee: transportation and attendant, 6(16)
 - employee, 6(1)(b)
 - child's schooling, 6(1)(b)(ix)
 - exempt, 81(1)(d)
 - family, *see* Canada Child Benefit
 - inventory, repealed [was 20(1)(gg)]
 - investment in property in Canada, 219(1)(j), Reg. 808
 - Member of Legislative Assembly, 81(2) [before 2019]
 - members of Canadian Forces, 6(1)(b)(ii)
 - mines, Reg. Part XII
 - motor vehicle, employee's, 6(1)(b)(vii.1)
 - where deemed not reasonable, 6(1)(b)(x), (xi)
 - municipal officer's, 81(3) [before 2019]
 - not income, 6(1)(b)(i)–(ix)
 - oil or gas wells, Reg. Part XII
 - parking, for disabled employee, not income, 6(16)
 - received, as income, 6(1)(b)
 - representation, not income, 6(1)(b)(iii), (iv)
 - resource [repealed], 20(1)(v.1)
 - resource and processing, Reg. Part XII
 - retiring, *see* Retiring allowance
 - support payments, defined with respect to, 56(12)
 - transportation
 - disabled employee, 6(16)
 - remote work site, 6(6)(b)
 - travelling, not income, 6(1)(b)(i), (ii), (v)–(vii)
 - volunteer firefighters and emergency workers
 - not income, 81(4)
- Alta Energy case overruled (re unforeseen tax strategies)**, 245(0.1)
- Alter ego trust**
- deduction from income, 104(6)(b)B(i)
 - defined, 104(4)(a)(iv)(A), 248(1)
 - distribution of property to person other than taxpayer, 107(4)(a)(ii)
 - preferred beneficiary election by, 104(15)(a)

Index

- Alter ego trust (*cont'd*)
 - principal residence exemption, 54“principal residence”(c.1)(iii.1)(A)
 - transfer by, to another trust, 104(5.8)
 - transfer to, rollover, 73(1.01)(c)(ii)
- Alterations to driveway**
 - medical expense credit, 118.2(2)(l.6)
- Altered auditory feedback device**
 - medical expense credit, Reg. 5700(z.1)
- Alternative basis for assessment**
 - Minister allowed to raise, 152(9)
- Alternative Minimum Tax**, *see* Minimum tax
- Amalgamation**, 87, *see also* Merger
 - accrual rules, 87(2)(j.4)
 - affiliated corporations, 251.1(2)
 - agricultural cooperative corporation, 87(2)(s)
 - associated corporations, 256(7)(b)
 - balance-due day, 87(2)(oo.1)
 - balance of tax for year, when due, 87(2)(oo.1)
 - Canadian film or video tax credit, 87(2)(j.94)
 - Canadian resource property, 66.7(10)(j), 66.7(10.1)
 - capital dividend account, 87(2)(z.1)
 - capital dividends, 87(2)(x)(ii)
 - capital property, 53(6), 87(2)(e)
 - carryback of losses, 87(2.11)
 - charitable gifts, 87(2)(v)
 - computation of income, 87(2)(c)
 - continuation of predecessors, 87(2)(g.1), (j.6)–(j.95), (qq)
 - butterfly reorganizations, 55(3.2)(b)
 - contributed surplus, 87(2)(y)
 - corporation beneficiary under life insurance policy, 89(2)
 - corporations deemed related, 251(3.1), (3.2)
 - credit unions in Quebec, 87(2.3)
 - cross-border, 128.2
 - cumulative offset account, computation, 87(2)(pp)
 - debt obligation acquired, 87(2)(e.2)
 - debts
 - between two predecessor corporations, 80.01(3)
 - owing by predecessor corporation, 87(6), (7); ITAR 26(23)
 - owing to predecessor corporation, 87(2)(h)
 - deemed proceeds of disposition, 69(13)
 - defined, 87(1)
 - pre-1972, ITAR 34(7)
 - depreciable property, 87(2)(d), (d.1)
 - employee benefit plans, 87(2)(j.3)
 - employee stock options, 7(1.4), (1.5)
 - employees profit sharing plan election, 87(2)(r)
 - employment tax credit, 87(2)(qq)
 - exchanged shares, 87(4.1), (4.2)
 - exchange of franchise, concession or licence, 87(2)(l.4)
 - farming or fishing insurer, 87(1), 89(1)“taxable Canadian corporation”(b)
 - farm losses, 87(2.1)
 - film/video production services credit, 87(2)(j.94)
 - flow-through entity, 87(2)(bb.1)
 - flow-through shares, 87(4.4)
 - renunciation of CDE as CEE before 2019, calculation of taxable capital limit, 66(12.6013)
 - following debt forgiveness, deemed capital gain, 80.03(3)(a)(ii)
 - foreign, *see* Foreign merger
 - foreign affiliate, shares of, 87(2)(u), Reg. 5905(5.1)
 - foreign affiliates, 87(8), (8.1), Reg. 5905(3)
 - foreign corporation with Canadian resident corporation, 128.2
 - foreign investment entity, interest in, 87(2)(j.95)
 - foreign resource property, 66.7(10)(j), 66.7(10.1)
 - foreign tax carryover, 87(2)(z)
 - functional currency rules, 261(17)–(19)
 - general rate income pool determination, 87(2)(vv), 89(5)
 - insurance corporation, 87(2.2)
 - causing demutualization, 139.1(3)(g)
 - inventory, 87(2)(b)
 - adjustment, 87(2)(j.1)
 - investment tax credit, 87(2)(j.6), (oo.1), (qq)
 - labour-sponsored venture capital corporation, 204.85(3)
 - permission of Minister needed, 204.85(1)
 - lease, cancellation of, 87(2)(j.5)
 - leasing properties, 16.1(4)
 - liability for Part VI.1 tax transferred, 87(2)(ss)
 - life insurance capital dividends, 87(2)(x)(ii)
 - limited partnership losses, 87(2.1)
 - losses
 - carryback, 87(2.11)
 - carryforward, 87(2.1)
 - low rate income pool determination, 87(2)(ww), 89(9)
 - mark-to-market property, 87(2)(e.4)
 - mutual fund corporations, 87(2)(bb)
 - net capital losses, 87(2.1)
 - new corporation
 - deemed continuation of predecessors, 87(1.2), (2)(j.6)–(j.9), (l)
 - accrual rules, 87(2)(j.4)
 - bank reserves, 87(2)(g.1)
 - cancellation of lease, 87(2)(j.5)
 - charitable gifts, 87(2)(v)
 - deduction for Part I.3 tax, 87(2)(j.9)
 - deduction of Part VI tax, 87(2)(j.9)
 - employee benefit plans, 87(2)(j.3)
 - inclusion of deferred amounts for livestock, 87(2)(tt)
 - insurance corporations, 87(2.2)
 - Part III, 87(2)(z.2)
 - Part III.1, 87(2)(z.2)
 - partnership interest, 87(2)(e.1)
 - prepaid expenses, 87(2)(j.2)
 - registered plans, 87(2)(q)
 - whether Canadian corporation, 89(1)“Canadian corporation”
 - new corporation deemed related to predecessors, 251(3.1), (3.2)
 - non-arm’s length transactions, 251(3.1)
 - non-capital losses, 87(2.1)
 - non-qualifying security, gift of, 87(2)(m.1)
 - non-resident trust, interest in, 87(2)(j.95)
 - not acquisition of control, 88(4)
 - obligations, *see* debts (*above*)
 - options
 - expired, 87(2)(o)
 - received on, ITAR 26(22)
 - to acquire shares of predecessor corporation, 87(5), (5.1)
 - paid-up capital, computation of, 87(3), (3.1)
 - partnership interest acquired, 87(2)(e.1)
 - patronage dividends, 87(2)(g.5)
 - pension fund real estate corporations, 149(1)(o.2) closing words
 - pre-1972 capital surplus on hand, 87(2)(t)
 - predecessor corporation
 - continued, 87(2)(jj)–(ll)
 - defined, 87(1)
 - preferred shares, 87(4.1), (4.2)
 - prepaid expenses, 87(2)(j.2)
 - proceeds of disposition not due until later year, 87(2)(m)
 - property lost, destroyed or taken, 87(2)(l.3)
 - public corporation, 87(2)(ii), 87(2)(j)–(ll)
 - qualifying environmental trust, interest in, 87(2)(j.93)
 - Quebec credit unions, 87(2.3)
 - refundable dividend tax on hand, 87(2)(aa)
 - refundable investment tax credit, 87(2)(oo.1)
 - refundable Part VII tax on hand, 87(2)(nn)
 - reserves, carryover to new corporation, 87(2)(g)

Index

Amalgamation (*cont'd*)

- residence of predecessor corporations, deemed, 128.2
- resource and processing allowances, Reg. 1214
- resource expenses, 66.7(6)
- resource property disposition, consideration for, 87(2)(p)
- restricted farm loss, 87(2.1)
- rights, exchange of, 87(4.3)
- rules applicable, 87(2)
- scientific research expenditures, 87(2)(l)–(1.2)
- security acquired, 87(2)(e.2)
- settlement of debts between predecessors, 80.01(3)
- shares
 - deemed received, 87(1.1)
 - exchange of, 87(4.1), (4.2)
 - issued by parent, 87(9)
 - predecessor corporations, of, 87(4)
 - received on, ITAR 26(21), 65(5)
- short-form, 87(1.1), (2.11)
- special reserve, 87(2)(i), (j)
- specified debt obligation, 87(2)(e.3)
- specified property, effect on adjusted cost base, 53(6)
- squeeze-out, new share deemed listed, 87(10)
- subsidiary wholly-owned corporation, 87(1.4)
- tax deferred cooperative shares, 87(2)(s)
- tax-deferred preferred shares previously issued, 83(7)
- taxable dividends, 87(2)(x)
- taxable preferred shares, tax on, 87(2)(rr)
- taxation year, 87(2)(a)
- transitional provisions, ITAR 34
- triangular, 87(9)
- vertical
 - carryback of losses, 87(2.11)
 - deemed cost of capital properties, 87(11)(b)
 - deemed proceeds from subsidiary's shares, 87(11)(a)
 - warranty outlays, 87(2)(n)

Amateur athlete

- defined, 143.1(1)

Amateur athlete trust, *see also* Athlete

- beneficiary, defined, 143.1(1.2)(e)
- death of beneficiary, 143.1(4)
- defined, 143.1(1.2), 248(1)
- distributions by
 - deemed
 - 8 years after last international competition, 143.1(3)
 - on death, 143.1(4)
 - included in income, 12(1)(z), 143.1(2)
 - non-resident beneficiary, to
 - tax on trust, 210.2(2)
 - withholding tax, 212(1)(u), 214(3)(k)
- emigration of beneficiary, no deemed disposition, 128.1(10)“excluded right or interest”(e)(ii)
- excluded from various trust rules, 108(1)“trust”(a)
- no tax payable by, 143.1(1.2)(g), 149(1)(v)
- rollover to new trust, 248(1)“disposition”(f)(vi)
- termination of, 143.1(3)
- trustee, defined, 143.1(1.2)(f)

Amateur athletic association, *see* Canadian amateur athletic association; Registered Canadian amateur athletic association

Amazon

- reporting of sales by sellers, 282–295

Ambassador, *see* Diplomat

Ambulance

- excluded from “automobile”, 248(1)“automobile”(b)
- medical expense credit, 118.2(2)(f)
- technician, volunteer
 - exemption from employment income, 81(4)

Amended Act

- defined, ITAR 8

Amendment

- citation of, *Interpretation Act* s. 40(2)
- regulations, *Interpretation Act* s. 31(4)
- when in force
 - proclamation, *Interpretation Act* s. 18
 - Royal Assent, *Interpretation Act* s. 6(3)
- within power of Parliament, *Interpretation Act* s. 42

Amendments to elections, 220(3.2)

- COVID-19 Canada Emergency Wage Subsidy and Canada Emergency Rent Subsidy, 125.7(10)

American Depository Receipt

- qualified investment for RRSP etc., Reg. 4900(1)(w)

American Friends of Canadian Land Trusts

- prescribed donee, Reg. 3504(c)

American Friends of Canadian Nature

- prescribed donee, Reg. 3504(a)

American law, *see* United States

Ammonite gemstone

- treated as mineral, 248(1)“mineral”, “mineral resource”(d)(ii)

Amortization

- depreciable property, *see* Capital cost allowance
- expenditures, *see* Matchable expenditure

Amortization date (for specified debt obligation), Reg. 9200(2)

Amortized cost

- defined, 248(1)
- re loan or lending asset, 248(1)
- re pre-1972 obligation, ITAR 26(12)
- variation in, for certain insurers, 138(13)

Amount

- defined, 248(1)
- list of, *see* Dollar amounts in legislation and regulations
- negative, deemed nil, 257

Amount of remuneration

- defined, re payment to a fisherman, Reg. 105.1(1)

Amount or item reported

- meaning of, for insurer, 138(12.3)

Amounts receivable

- deceased taxpayer, by, 70(2), (3)

Amusement parks

- capital cost allowance, Reg. Sch. II:Cl. 37
- defined, Reg. 1104(12)

Amusement parks relief (COVID), Reg. 8901.1(2)(b)(viii), *see also* Qualifying tourism or hospitality entity

Ancillary tuition fees, credit, 118.5(3)

Animal

- breeding, defined, 80.3(1)
- inventory valuation, 28(1.2), Reg. 1802
- specified, defined, 28(1.2)
- trained to assist disabled person, medical expense credit, 118.2(2)(l)

Animation production

- allocation of points to determine whether Canadian production, Reg. 1106(5)(b), (c), Reg. 1106(7)
- defined, Reg. 1106(6)

Anniversary day

- investment contract, of, defined, 12(11)“anniversary day”

Annual child care expense amount

- defined, 63(3)

Annual dues

- professional membership, deduction, 8(1)(i)(i)
- trade union, etc., deductible, 8(1)(i)(iv)–(vi)

Annual FHSA limit

- defined, 146.1(1)

- “Annual gains limit” defined**, 110.6(1)
- Annual investment tax credit limit, defined**, 127(9)
- Annual operations knowledge sharing report**
- defined, for CCUS knowledge sharing, 211.92(1)
- Annual reporting of interest**, *see* Interest (monetary): accrued
- Annuitant**
- defined
 - for Home Buyers’ Plan, 146.01(1)
 - for Lifelong Learning Plan, 146.02(1)
 - for prescribed annuity contracts, Reg. 304(4)
 - for RRIF, 146.3(1), Reg. 215(1)
 - for RRSP, 146(1), Reg. 214(7)
 - for registered labour-sponsored venture capital corporations, defined, 204.8(1)
- Annuity**, Reg. Part III, *see also* Annuity contract
- accrual to date of death, 70(1)(a)
 - accrued interest on, taxable, 12.2
 - advanced, *see* Advanced life deferred annuity
 - buy-out (from RPP), 147.4(1)
 - cancellation or termination of, Reg. 303
 - capital element deductible, 60(a), Reg. 300
 - capital/income elements, 16(4)
 - constitutes life insurance policy, 138(12)“life insurance policy”
 - contract, *see* Annuity contract
 - DPSP investment eligibility, 204“qualified investment”
 - deduction, 20(19)
 - deferred, *see* Advanced life deferred annuity
 - defined, 248(1); *Income Tax Conventions Interpretation Act* s. 5; Canada-U.S. Tax Treaty:Art. XVIII:4; Canada-UK Tax Treaty:Art. 17:3
 - definitions, Reg. 310
 - disposition of
 - deduction, 20(20)
 - taxable, 56(1)(d.2)
 - disposition of interest in
 - information return, Reg. 217
 - emigration of beneficiary, no deemed disposition, 128.1(10)“excluded right or interest”(f)(i)
 - from pre-1998 pension plan, deemed to be pension payments, 254
 - income-averaging, *see* Income-averaging annuity contract
 - insured, leveraged, *see* LIA policy
 - interest on money borrowed to buy
 - amount deductible, 20(1)(c)(iv)
 - life insurance proceeds, as, 148(6), (10)
 - locked-in, held by RRIF, 146.3(1)“qualified investment”(b.2)
 - money borrowed to buy
 - limitation on deductibility, 18(11)(d)
 - PRPP purchase of, 147.5(5)(a), 147.5(21)(c)(vi)
 - payments
 - capital element of, 60(a), Reg. 300
 - life annuity contracts, Reg. 301
 - non-residents, to, 212(1)(o)
 - taxable, 56(1)(d)
 - from pooled registered pension plan, taxable, 147.5(23)
 - prescribed, Reg. 304, *see also* Prescribed annuity contract
 - qualified, defined, Reg. 1408(1)
 - RESP investment eligibility, 146.1(1)“qualified investment”(c)
 - RPP (defined-contribution) purchase of, 147.3(1)(c)(iv), Reg. 8506(1)(e.2)
 - RPP conversion to, 147.4(1)
 - RRIF investment eligibility, 146.3(1)“qualified investment”(b.1), (b.2)
 - RRSP investment eligibility, 146(1)“qualified investment”(c)–(c.2)
 - RRSP premium refund transferred to, 60(1)
 - receipt of, income, 56(1)(d), (d.2)
 - registered pension plan, 147.4
 - variable, *see* Variable payment life annuity
 - withholding tax, 153(1)(f), 212(1)(o)
- Annuity contract**
- defined, for Common Reporting Standard, 270(1)
- Annulment**
- charity registration, *see* Registered charity: registration of: annulment of registration
- Antecedent corporation**
- defined, 95(1)
- Anti-avoidance rules**
- 150-investor rule for non-resident trusts, 94(15)(a)
 - abuse of the Act, 245(4)
 - acquisition of option rather than shares to avoid various rules, 256(8)
 - arm’s length rule, 246(2)
 - associated corporations, 256(2.1)
 - at-risk amount of limited partner, 96(2.6), (2.7)
 - attribution rules, *see* Attribution rules
 - avoidance transaction, defined, 245(3)
 - back-to-back loans, *see* Back-to-back loans
 - back-to-back-royalties, 212(3.9)–(3.94)
 - bank and life insurer surtax, 125.6(6)
 - blocking deficits, Reg. 5905(7.1)–(7.7)
 - business limit (small business deduction), 125(9)
 - Canada Emergency Wage Subsidy (CEWS) and Canada Emergency Rent Subsidy (CERS), 125.7(6)
 - Canada Recovery Hiring Program (CRHP), 125.7(6.1)
 - Canadian controlled private corporations, 248(1)“substantive CCPC”, 248(3)
 - capital dividend, share acquired to receive, 83(2.1)
 - capital gains exemption
 - allocated through partnership or trust, 110.6(11)
 - butterfly, on, 110.6(7)(a)
 - conversion of dividends into exempt capital gains, 110.6(8)
 - failure to declare exempt gain, 110.6(6)
 - gain of corporation converted to gain of individual, 110.6(7)(b)
 - sale of shares of corporation, 84.1(2)(a.1)(ii), 84.1(2.1)(b)
 - capital gains stripping, 55(2), 110.6(7)(a)
 - charitable donation flips, 248(35)–(41)
 - charitable donation returned to donor, 110.1(14)–(17), 118.1(25)–(28)
 - charity’s expenditures on non-charitable activities, 149.1(4.1)
 - Common Reporting Standard (reporting of account information to foreign tax authorities), 280
 - contingent amounts in expenditures, 143.4
 - corporate members of partnerships, 34.2, 125(6), 125(7)“specified partnership income”
 - corporations becoming related to transfer forgiven amount of debt, 80.04(8)
 - corporations deemed associated, 256(2.1)
 - cross-border purchase butterfly, 55(3.1)
 - debt forgiveness reserve, 61.3(3), 160.4
 - debt parking, 39(2.01)–(2.03), 80.01
 - deferral of tax
 - corporate partner, 34.2
 - individual partner, 34.1
 - deductions accrued but unpaid, 78
 - derivatives, mark-to-market restrictions, 10.1
 - determination by Minister of tax consequences, 152(1.11), (1.12)
 - binding effect, 152(1.3)
 - disbursement quota of charity, 149.1(4.1)
 - disposition not at arm’s length, 69(1)
 - disposition of share of foreign affiliate, 93(2)–(2.3)
 - divestment obligation percentage (private foundation), 188.1(3.2)–(3.5)
 - dividend refund, 129(1.2)
 - dividend stripping, *see* Surplus stripping
 - donation of flow-through shares, 40(12)

Index

- Anti-avoidance rules (*cont'd*)
 - after rollover of shares, 38.1
 - eligible dividends, 89(1)“excessive eligible dividend designation”(c)
 - emigration
 - deemed disposition by trust of assets transferred before emigration, 104(4)(a.3)
 - deemed disposition of assets, 128.1(4)
 - employees profit sharing plans (excess EPSP amount), 207.8
 - FATCA, 268
 - foreign account reporting, 268, 280
 - foreign accrual property income
 - insurance of Canadian risks (and insurance swaps), 95(2)(a.2)–(a.24)
 - offshore regulated banks, 95(2.11)
 - foreign accrual tax, 91(4.1)–(4.7)
 - foreign affiliate dumping, 212.3
 - corporate emigration, 219.1(2)
 - corporate immigration, 128.1(1)(c.3)
 - cross-border class, anti-avoidance rule, 212.3(6)
 - foreign affiliate rules, 95(6), Reg. 5905(7.1)–(7.7)
 - artificial generation of FAT, 91(41)
 - artificial generation of UFT, Reg. 5907(1.03)
 - loans from foreign affiliates, 90(6)–(15)
 - surplus computations, Reg. 5907(2.02)
 - foreign affiliate share-for-share exchange, 85.1(4)(a)
 - foreign currency debt parking, 39(2.01)–(2.03)
 - foreign investment entities, *see* Tax avoidance motive
 - foreign mergers, 87(8.3)
 - foreign partnership, 96(9)(a)
 - foreign resource property, 85(1.11)(a)
 - foreign tax credit, 126(4)–(4.3)
 - FTC generators, 91(4.1)–(4.7), 126(4.11)–(4.13), Reg. 5907(1.03)–(1.09)
 - functional currency reporting, 261(18)–(21)
 - general rule, 245(2), *see also* General anti-avoidance rule
 - gift of property, 69(1)(b)(ii), 74.1, 160(1)
 - goodwill, transition from eligible capital property to CCA, 13(40)
 - gross revenue increases for transfer pricing rules, 247(9)
 - hedges crossing year-end, 18(17)–(23)
 - income-splitting tax, 120.4, *see also* Split income
 - income-splitting through spousal RRSPs, 146(8.3), 146.3(5.1)–(5.5)
 - indirect loan to non-resident, 17(2)
 - insurance corporations, 138(2.6)
 - interest coupon stripping, 212(1)(b)(i)(B), 212(21)–(23)
 - interest deduction restrictions, 18.2(12)–(15), 18.21(6)
 - interest-free or low-interest loans, 56(4.1)
 - investment tax credit
 - qualified expenditures, 127(24)
 - transfer of SR&ED pool, 127(16)
 - life insurance policies
 - distribution of proceeds
 - by corporation, 89(1)“capital dividend account”(d)(iii)
 - by partnership, 53(1)(e)(iii)
 - exempt policy, Reg. 306(1)
 - transfer of, not at arm’s length, 89(1)“capital dividend account”(d)(v), 148(7)
 - life insurer using foreign branch to insure Canadian risks, 138(2.1)–(2.6)
 - loan from corporation, 15(2)–(2.6), 90(6)–(15)
 - loan not at arm’s length, 56(4.1)–(4.3)
 - loan to non-resident, 17
 - through partnership, 17(4)
 - through trust, 17(5)
 - look-through for trusts and partnerships, on non-arm’s length sale of shares, 212.1(7)
 - loss carryover rules, on change of corporate control, 111(5.5)(b)
 - losses imported by partnership by acquiring Canadian partner, 96(8), (9)
 - misuse of the Act, 245(4)
 - mutual fund trust election for December 15 year-end, where beneficiaries change, 132.11(8)
 - newspaper or periodical, control by non-resident, 19(8)
 - non-resident trust, indirect transfer to, 94(2)
 - non-resident trust transfer to another trust, 94(11)–(13)
 - offshore trusts, 94
 - Part II.2 tax, 183.3(3), (6)
 - partnership acquiring capital properties to avoid debt forgiveness rules, 80(18)
 - partnership, by, 103
 - partnership capital contribution where other partner withdraws funds, 40(3.13)
 - partnership interest disposition, 100(1.4), (1.5)
 - partnership with non-resident partners importing losses, 96(8), (9)
 - payment of capital dividend through trust to non-resident, 212(1)(c)(i)
 - penalties, *see* Penalty
 - pension adjustment, artificial reduction of, Reg. 8503(14)
 - pension, past service employer contributions in lieu of salary, Reg. 8503(15)
 - preferred shares, 248(1)“term preferred share”(a)(iv)(B), (i.1)(ii), (j)(ii)
 - pregnant losses, *see* Pregnant loss
 - private foundations, 149.2(2), 188.1(3.2)–(3.5)
 - purchase butterfly, 55(1)“permitted exchange”, (3.1), (3.2)
 - registered disability savings plan (RDSP)
 - advantage, prohibited investment or non-qualified investment, 207.01–207.07
 - registered education savings plan (RESP)
 - advantage, prohibited investment or non-qualified investment, 207.01–207.07
 - replacement of beneficiary, 204.9(4)
 - registered pension plan phased retirement rules, Reg. 8503(22)
 - registered pension plan, replacement of money purchase benefits, Reg. 8304(2)(f)
 - reportable transaction rules, 237.3
 - residence of corporation, 250(5)
 - retirement compensation arrangement
 - disposition for less than fair market value, 56(11)
 - “right to reduce” an expenditure, 143.4
 - royalty reimbursements, 80.2
 - SIFT rollovers, 248(1)“SIFT trust wind-up event”(e)
 - sale of shares by non-resident, 212.1
 - sale of shares for dividend stripping, 84.1
 - section 160 planning, 160(5)
 - securities lending arrangement, 260(1)“securities lending arrangement” closing words, *see also* Specified hedging transaction
 - selling property and donating proceeds to charity, 248(39)
 - share acquired to obtain dividend refund, 129(1.2)
 - share repurchase transaction, 112(5.2)B(a)
 - small business deduction limit, 125(9)
 - corporate partners, 34.2, 125(6), 125(7)“specified partnership income”
 - small business investment rollover, 44.1(12)
 - specified member of partnership, 40(3.131), 127.52(2.1)
 - stapled securities, 12.6
 - stock buyback tax, 183.3(3), (6)
 - stop-loss rules, *see* Stop-loss rules
 - straddle transactions, 18(17)–(23)
 - surplus stripping, *see* Surplus stripping
 - synthetic equity arrangements, 112(2.3)–(2.34)
 - TFSA, 207.01–207.07
 - tax debt avoidance, 160(5)
 - testamentary trust, 108(1)“testamentary trust”(d)
 - transfer of insurance business by non-resident insurer, 138(11.7)

Index

- Anti-avoidance rules (*cont'd*)
 - transfer of property between trusts to delay deemed disposition rules, 104(5.8)
 - transfer of property by tax debtor, 160
 - transfer of property for low or no consideration, 69(1)(b), 74.1, 160(1)
 - transfer of property with pregnant loss, 13(21.2), 40(3.3), (3.4)
 - transfer pricing, 247
 - treaty shopping, Canada-U.S. Tax Treaty:Art. XXIX-A
 - trust distributing assets before death, 104(4)(a.2)
 - trust, excessive capital interest, 104(7.1), (7.2)
 - trust receiving assets before emigration, 104(4)(a.3)
 - trust with accrued loss, acquisition of interest in, 107(6)
 - trusts, allocation of income and capital to different beneficiaries, 104(7.1), (7.2)
 - underlying foreign tax, Reg. 5907(1.03)
 - unreasonable consideration, 247
 - withholding tax on dividends, Canada-U.K. Tax Treaty Art. 10:7
 - withholding tax on interest, Canada-U.K. Tax Treaty Art. 11:11
 - withholding tax on royalties, Canada-U.K. Tax Treaty Art. 12:8
- Anticosti Island**
 - prescribed intermediate zone for northern residents' deduction, Reg. 7303.1(2)
- Anti-dumping duties or countervailing duties**
 - deductible, 20(1)(vv)
 - included in UCC of depreciable property, 13(21)"undepreciated capital cost"D.1
 - refund of
 - deducted from UCC of depreciable property, 13(21)"undepreciated capital cost"K
 - taxable, 12(1)(z.6)
- Anti-money laundering and know your customer procedures**
 - defined, for Common Reporting Standard, 270(1)
- Antiques, CCA disallowed**, Reg. 1102(1)(e)
- Antoine Guertin Ltée case overruled**, 20(1)(e.2)
- Appeal**, *see also* Tax Court of Canada
 - bifurcation, 171(2)
 - books and records, 230(6)
 - disposal of
 - Minister's duty after, 164(4.1)
 - reassessment, on consent, 169(3)
 - Tax Court, by, 171
 - ecological property valuation, 169(1.1)
 - expense of making, deduction, 60(o)
 - extension of time for making, 167
 - Federal Court of Appeal, to, *see* Federal Court of Appeal
 - frivolous, 10% penalty, 179.1
 - general procedure, 175
 - grounds for, whether raised in Notice of Objection, 169(2.1)
 - *in camera* proceedings in Federal Court, 179
 - informal procedure, 170
 - large corporation by, only on grounds raised in objection, 169(2.1)
 - legal costs of, 152(1.2)
 - limitation on grounds for filing, 169(2), (2.1)
 - Minister may change grounds for assessment, 152(9)
 - notice of, Tax Court to Commissioner, 170(1)
 - Part II.2 tax, 183.4(2)
 - Part IV.1 tax, 187.6
 - Part VI.1 tax, 191.4(2)
 - Part VI.2 tax, 191.6
 - Part XII.2 tax, 210.2(7)
 - Part XII.3 tax, 211.5
 - Part XII.4 tax, 211.6(5)
 - Part XII.5 tax, 211.82
 - repayment on, 164(1.1)
 - restriction on collection action while underway, 225.1
 - stay of, during action, 239(4)
 - Tax Court decisions, from, 174(4.1)
 - Tax Court of Canada, to, 169, 170, 174
 - time not counted, 173(2), 174(5)
 - transitional provisions, ITAR 62(4)-(6)
 - where no reasonable grounds for, 179.1
 - where right to appeal waived, 169(2.2)
 - withholding tax on dividends, Canada-U.K. tax treaty Art. 10:7
 - withholding tax on interest, Canada-U.K. tax treaty Art. 11:11
 - withholding tax on royalties, Canada-U.K. tax treaty Art. 12:8
- Appliance service technician**
 - apprenticeship job creation credit, 127(9)"investment tax credit"
- Applicable fraction (for debt forgiveness rules)**
 - application of to capital losses, 80(4)
 - defined, 80(2)(d)
- Application deadline**
 - defined, Reg. 1106(1)"application for a certificate of completion"
- Application for a certificate of completion**
 - defined, for Canadian film/video credit, Reg. 1106(1), (1.1)
- Application for continuance (for Canadian Wheat Board)**
 - defined, 135.2(1)
- Apportionment**, *see also* Allocation; Splitting, sharing or apportionment
 - bond interest to date of sale, 20(14)
 - income accrued to date of death, 70(1)(a)
 - proceeds of disposition, between property and services, 68
 - tax credit, *see* Splitting, sharing or apportionment
 - taxable and exempt income, between, 149(6)
- Apprentice**
 - grant to, *see* Apprenticeship Incentive Grant or Apprenticeship Completion Grant
 - job creation, investment tax credit, 127(9)"apprenticeship expenditure", 127(9)"investment tax credit"(a.4)
 - mechanic
 - eligible, defined, 8(6)(a)
 - tools, deduction from employment income, 8(1)(r)
 - GST rebate on, 6(8)
 - income inclusion on sale of tools, 56(1)(k)
 - rollover of tools to corporation, 85(5.1)
 - rollover of tools to partnership, 97(5)
 - payments received by, Canada-U.S. Tax Treaty:Art. XX
 - travel to construction job site, deduction, 8(1)(q.1)
- Apprenticeship expenditure**
 - defined, 127(9)
 - reduction for assistance received, 127(11.1)(c.4)
 - investment tax credit for, 127(5)(a)(i), 127(9)"investment tax credit"(a.4)
 - carryforward or carryback, 127(9)"investment tax credit"(c)
- Apprenticeship Incentive Grant or Apprenticeship Completion Grant**
 - information return required, Reg. 200(2)(b.1)
 - is earned income for child care expense, 63(3)"earned income"(b)
 - repayment of, deductible, 60(p)
 - taxable, 56(1)(n.1)
- Appropriate minister**
 - defined, 13(21)
- Appropriate percentage**
 - defined, 248(1)
- Appropriation Act**
 - interest paid under
 - deduction for, 20(1)(c)(iii)
- Appropriation of amounts**
 - to transfer balance between tax accounts, 221.2

Appropriation of property

- by shareholder, generally, 69(4)
- legal representative, by, 159(3.1)
- on winding-up of corporation, 69(5), 84(2)

Approved pension plan

- included in reference to “registered” plan, ITAR 17(8)

Approved project, defined, 127(9)**Approved project property [repealed]**

- defined, 127(9)

Approved share

- clawback on disposition, 211.8(1)
- defined, 127.4(1), 211.7(1)

Arbitration of disputes

- United Kingdom, Canada-U.K. Tax Treaty:Art. 23:6, 7
- United States, Canada-U.S. Tax Treaty:Art. XXVI:6, 7; Fifth Protocol (2007) Annex A

Arcade games relief (COVID), Reg. 8901.1(2)(b)(ix)(A)(IV), (b)(xv), see also Qualifying tourism or hospitality entity**Armed forces, see Canadian Forces and veterans****Arm’s length**

- allocation, *see* Arm’s length allocation
- dividend dealings, 55(4), (5)(e)
- meaning of, 251(1)
 - beneficiary and trust, 251(1)(b)
 - for CCA purposes, Reg. 1102(20)
 - for currency dealings with foreign affiliate, 95(2.1)
 - for debt forgiveness rules, 80(2)(j)
 - for divisive reorganizations, 55(4), (5)(e)
 - for non-arm’s length sale of shares, 84.1(2)(b), (d), 212.1(3)(c)
 - for resource expenses renounced to partnership on flow-through shares, 66(17)
 - for s. 160 avoidance of tax debts, 160(5)(a)
 - for stock option rules, mutual fund trust, 7(1.11)
 - for tax shelter investment where information outside Canada, 143.2(14)
 - for windup of subsidiary, 88(1)(d.2)
- not deemed to confer benefit, 246(2)
- transfer, *see* Arm’s length transfer
- transfer price, *see* Arm’s length transfer price

Arm’s length allocation

- defined, 247(1)

Arm’s length capital

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

Arm’s length transfer

- defined, 94(1)
- price, *see* Arm’s length transfer price

Arm’s length transfer price, see also Transfer pricing

- defined, 247(1)
- required for transactions with related non-residents, 247(2)

Arrears interest

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

Arrijoja case overruled, 118.5(1)(d)**Arrival in Canada, see Becoming resident in Canada****Art, see also Cultural property; Listed personal property**

- whether CCA allowed, Reg. 1102(1)(e)

Art flips

- donation valued at cost of art, 248(35)–(38)
- minimum \$1,000 proceeds eliminated, 46(5)
- penalties for valuers and promoters, 163.2

Art shelters, see Art flips**Artificial eye, medical expense, 118.2(2)(i)****Artificial kidney machine, medical expense, 118.2(2)(i)****Artificial limb**

- costs, as medical expenses, 118.2(2)(i)

Artificial transactions, see Anti-avoidance rules**Artist**

- artistic endeavour, 10(6)–(8)
- expenses, deduction from employment income, 8(1)(q)
- gift of work of art created by, 118.1(7), (7.1)
- organization for, *see* Registered national arts service organization
- project grant, included in income, 56(1)(n)
- U.S. resident, Canada-U.S. Tax Treaty:Art. XVI
- valuation of inventory, 10(6)–(8)

Artistic endeavour

- defined, 10(8)
- value of inventory, 10(6), (7)

Artistic events relief (COVID), Reg. 8901.1(2)(b)(iv), see also Qualifying tourism or hospitality entity**Artistic work, copyright royalties**

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

Arts credit for children, see Children’s Arts Tax Credit (pre-2017)**Arts service organization, see Registered national arts service organization****“As registered” (pension plan), meaning, 147.1(15)****Asian Development Bank**

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

Assessable distribution

- defined, for Part XIII.2 tax, 218.3(1)
- does not reduce adjusted cost base of capital interest in trust, 53(2)(h)(i.1)(B)(III)
- payment of to non-resident
 - information return, Reg. 202(1)(f)
 - tax on, 218.3(2)

Assessable dividend (for Part IV tax)

- defined, 186(3)
- tax on, 186(1)(a)

Assessment, see also Determination; Limitation period; Reassessment

- alternative basis for, permitted, 152(9)
- amounts received under RCA trust, re, 160.3(2)
- appeal from, *see* Appeal
- arbitrary, 152(7)
- consequential, of other taxation year, 152(4.3)
- date of mailing, 244(14)
- date of making, 244(15)
- derivative, 160
- determination binding, 152(1.3)–(3)
- excess refund, 160.1(3)
- failure to withhold tax, 227(10)–(10.8)
- includes reassessment, 248(1)
- incorrect or incomplete, 152(3), (8)
- irregularities in, not invalidating, 152(3), (8), 166
- issue in respect of, reference to Tax Court, 173
- jeopardy, 225.2
- losses, of, *see* Determination
- Minister, by, 152(1)
- net worth, 152(7)
- notice of, 152(2)
 - date of, 244(14), (15)
 - electronic
 - allowed for corporation, 244(14.2)
 - allowed if individual’s return is e-filed, 150.1(4.1)
 - allowed if email address given by individual, 244(14.1)
 - when presumed received, 244(14.1)
- objection to, *see* Objection
- Part II.2 tax, 183.4(2)
- Part IV tax, allowed 1 year late, 152(4.31)
- Part IV.1 tax, 187.6
- Part VI.1 tax, 191.4(2)
- Part VI.2 tax, 191.6

Index

- Assessment (cont'd)**
- Part XII.2 tax, 210.2(7)
 - Part XII.3 tax, 211.5
 - Part XII.4 tax, 211.6(5)
 - Part XII.5 tax, 227(10.01), 227(10.1)(c), 211.82
 - Part XII.6 tax, 211.91(3)
 - past regular deadline, 152(4)
 - transitional provision, ITAR 62(1)
 - valid and binding despite defects, 152(8)
 - zipper penalty, 163.3(5)
- Asset**
- computation of, for debt forgiveness reserve, 61.3(1)(b)B(i)
 - lending
 - defined, 248(1)
 - of insurer/moneylender
 - limitation on deduction re, where reduced in value, 18(1)(s)
- Asset-backed securities**
- qualified investment for RRSP etc., 204“qualified investment”(c.1) (formerly Reg. 4900(1)(i.3))
- Assignee, see also Legal representative**
- deemed to be legal representative, 248(1)“legal representative”
 - obligations of, 159
 - return required by, 150(3)
 - withholding tax, liability for, 227(5), (5.1)(g)
- Assignment**
- rights to income, 56(4)
 - tax refund, permitted, 220(6)
- Assistance/government assistance**
- air quality improvement credit, 127.43(5)
 - Canadian development expense, in respect of, 66.2(5)“Canadian development expense”, 66.2(5)“cumulative Canadian development expense”D, M
 - Canadian exploration expense, in respect of, 66.1(6)“Canadian exploration expense”, 66.1(6)“cumulative Canadian exploration expense”E, J
 - Canadian film/video tax credit
 - constitutes assistance for all purposes, 125.4(5)
 - defined, 125.4(1)
 - Canadian oil and gas property expense, in respect of, 66.4(5)“Canadian oil and gas property expense”, 66.4(5)“cumulative Canadian oil and gas property expense”D, I
 - capital cost allowance, effect on, 13(7.1)
 - carbon tax refund to farmers, 127.42(7)
 - defined
 - for air quality improvement credit, 127.43(1)
 - for film/video production services tax credit, 125.5(1)
 - for investment tax credit, 127(9)“government assistance”
 - for journalism labour credit, 125.6(1)
 - for resource exploration and development rules, 66(15)“assistance”
 - includes GST input tax credits, 248(16)–(18)
 - includes QST input tax refunds, 248(16.1), (17.1), (17.3), (18.1)
 - employer, provided by, for housing, 6(23)
 - expired, treated as repaid, 127(10.8)
 - exploration and development grant, deductible, 20(1)(kk)
 - film/video production services tax credit
 - constitutes assistance for all purposes, 125.5(5)
 - defined, 125.5(1)
 - flow-through critical mineral mining expenditure reduced, 127(11.1)(c.21)
 - flow-through mining expenditure reduced, 127(11.1)(c.2)
 - GST input tax credit or rebate deemed to be, 248(16)
 - GST input tax credit repaid deemed to be reduction in, 248(18)
 - government, defined, 127(9)
 - housing subsidy provided by employer, taxable, 6(23)
 - included in income, 12(1)(x)
 - increases adjusted cost base of partnership interest, 53(1)(e)(ix)
 - indirect, taxable, 12(1)(x)(i)(C)
 - investment tax credit reduction, 127(18)–(21)
 - non-government, defined, 127(9)
 - pre-production mining expenditure reduced, 127(11.1)(c.3)
 - prescribed benefit under government program
 - overpayment repaid, deductible, 60(n)(v)
 - taxable, 56(1)(a)(vi), Reg. 5502
 - QST input tax refund or rebate deemed to be, 248(16.1)
 - QST input tax refund repaid deemed to be reduction in, 248(18.1)
 - qualified expenditures, effect on, 127(18)–(21)
 - reduces adjusted base of partnership interest, 53(2)(c)(ix)
 - reduces adjusted cost base of property, 13(7.1), 127(11.1)(b)
 - reduces claim for scientific research, 37(1)(d)
 - reduces R&D expenditures, 127(11.1)(f) [repealed], 127(18)
 - repayment of
 - creates capital loss, 39(13)
 - deduction for, 20(1)(hh)
 - excluded from reduction in cost base, 53(2)(k), 53(2)(s)
 - includes repaid GST input tax credit, 248(18)
 - increases investment tax credit, 127(9)“investment tax credit”(e.1), 127(10.7)
 - reduces adjusted cost base of partnership interest, 53(1)(e)(ix)(B)
 - resource-related
 - allocated to member of partnership, 66.1(7), 66.2(6), (7), 66.4(6), (7)
 - increases adjusted cost base of partnership interest, 53(1)(e)(ix)
 - tax shelter investment excluded, 125.4(4)
- Assistance holdback amount**
- defined, for RDSP, 146.4(1)
- Assistant’s salary paid by employee**
- CPP contributions, UI/EI premiums deductible, 8(1)(1.1)
 - deduction, 8(1)(i)(ii)
 - certificate of employer, 8(10)
 - Quebec Parental Insurance Plan premiums deductible, 8(1)(1.2)
- Associated charities**
- designation by Minister, 149.1(7)
 - disbursement by one to another, 149.1(6)(c)
- Associated corporations, see also Related persons**
- amalgamation, following, 256(7)(b)
 - anti-avoidance rules
 - separate corporations deemed associated, 256(2.1)
 - transfer of assets for passive income SBD grind, 256(2.1)
 - base level deduction, 18(2.3)–(2.5)
 - certain shares excluded from fair market valuations, 256(1.6)
 - corporations associated with same corporation deemed associated with each other, 256(2)
 - defined, 256(1)
 - investment income from, 129(6)
 - investment tax, allocation of expenditure limit, 127(10.2)–(10.4)
 - land soft costs, allocation of base level deduction, 18(2.3)–(2.5)
 - options, 256(1.4)
 - parent deemed to own child’s shares, 256(1.3)
 - Part VI.1 tax, allocation of dividend allowance, 191.1(3)–(5)
 - person deemed related to himself, 256(1.5)
 - refundable SR&ED credit, special rule, 127.1(2.2), (2.3)
 - rights, 256(1.4)
 - small business deduction, 125(3)–(5)
 - specified class of shares, defined, 256(1.1)
 - SR&ED expenditure limit for investment tax credit, special rule, 127(10.22), (10.23)
- Association of Universities and Colleges of Canada, exempt, 149(1)(h.1)**

Index

Associations

- non-profit exemption, 149(1)(l)

Assumption of debt, 20(1)(e)(ii.2), 20(1)(e.1)(iii)

- debt forgiveness rules do not apply, 80(1)*forgiven amount*B(1)

At-risk adjustment (for tax shelter)

- defined, 143.2(2), (3)

At-risk amount, *see also* Limited partner; Tax shelter

- artificial transactions, 96(2.6), (2.7)
- defined, 96(2.2)
- limited partner's losses restricted to, 96(2.1)
- limited partnership interest acquired by subsequent person, 96(2.3)
- resource expenditures, 66.8

Athlete

- amateur junior players, room and board exempt, 6(1)(b)(v.1)
- association for, *see* Registered Canadian amateur athletic association
- income of, Canada–U.S. Tax Treaty, Canada-U.S. Tax Treaty:Art. XVI
- Major League Baseball Players Benefit Plan, Reg. 6800
- National Hockey League referees, Reg. 6801(c), 6802(d)
- signing bonus, taxable, 6(3), 115(2)(c.1), 115(2)(e)(v)
- trust for, *see* Amateur athlete trust
- tuition support received by, no tuition credit, 118.5(1)(a)(v)
- U.S. resident, Canada-U.S. Tax Treaty:Art. XVI

Atlantic Groundfish Adjustment Program/Atlantic

Groundfish Strategy, *see* Fishing: compensation programs

Atlantic Investment Tax Credit, 127(9)*investment tax credit*(a), 127(9)*specified percentage*(a)(iii)(D), (a.1)

Attendant, *see also* Part-time attendant

- for taxpayer or dependant mentally or physically impaired
- • allowance paid by employer, not income, 6(16)
- • deduction from income, 64(a)A(ii)(J)
- • • residents absent from Canada, 64.1
- • medical expense credit, 118.2(2)(b), (b.1), (c)
- • reimbursement of expenses, 118.2(3)(b)

Attendant care benefit

- paid to Canadian Forces member or veteran, exempt, 81(1)(d.1)(vii)(E)

Attorney, *see* Lawyer

Attribute trading restriction

- defined, 256.1(1)

Attributed surplus (of financial institution)

- defined, 181(2), 190(1.1)

Attributed surplus (non-resident insurer)

- defined, 219(7), Reg. 2400(1)
- • Large Corporations Tax, Reg. 8600

Attribution rules, *see also* Income-splitting

- Canada Child Benefit cheque deposited for child's benefit, 74.1(2)
- deemed receipt of dividend, 82(2)
- "designated person" defined, 74.5(5)
- FHSA, exception for, 74.5(12)(d)
- foreign income, *see* Foreign accrual property income
- gain/loss from property transferred or loaned, 74.2
- • farm property, 75.1
- • trust, to, 74.3(1)(b)
- income-splitting tax, 120.4, *see also* Split income
- indirect payments, 56(2)
- interest-free or low-interest loans, 56(4.1)
- loan or indebtedness, 56(4.1)–(4.3)
- property transferred to child, 74.1(2), 75.1
- property transferred to spouse
- • capital gain/loss on, 74.2(1)
- • income from, 74.1(1)
- property transferred to trust

- • income, gain or loss transferor's, 75(2)
- • trusts excluded, 75(3)
- qualifying trust annuity payment, 75.2(a)
- RDSP, exception for, 74.5(12)(a.2)
- RRSP spousal contributions
- • regular attribution rules do not apply, 74.5(12)
- • specific attribution rule, 146(8.3)
- reverse attribution, excluded, 74.5(11)
- Saskatchewan Pension Plan contributions, exceptions for, 74.5(12)
- spousal RRSP premiums, exception for, 74.5(12)
- TFSA, exception for, 74.5(12)(c)
- transfer or loan to child, 74.1(2)
- transfer or loan to corporation
- • income/loss from property transferred or loaned, 74.1
- • trust, to, 74.3(1)(a)
- transfer or loan to spouse, 74.1(1), 74.2(1)
- where not applicable, 74.5

Auction of seized chattels, 225(2)–(4)

Audio tapes or CDs

- talking textbooks
- • disability supports deduction, 64(a)A(ii)(I)
- • medical expense credit, Reg. 5700(w)

Audiologist

- certification of hearing impairment
- • for disability credit, 118.3(1)(a.2)(iii)
- defined, 118.4(2)

Audit, 231.1(1)

- compliance required, 231.5(2), 231.7
- contemporaneous documentation for transfer pricing, 247(4)
- copies or printouts of documents, 231.5(1)
- court order for compliance, 231.7
- fishing expedition, 231.2(3)

Auditory feedback device

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

Aunt, *see also* Niece/nephew

- defined, 252(2)(e)
- dependent, 118(6)(b)
- great-aunt defined, 252(2)(f)

Australia, *see also* Foreign government

- currency loan, *see* Weak currency debt
- currency of, use as functional currency, 261(1)*qualifying currency*(d)
- stock exchange recognized, 262
- trust resident in
- • exclusion from foreign property reporting, 233.3(1)*specified foreign property*(n)
- • special rules for, 93.3
- universities, gifts to, Reg. Sch. VIII, s. 17

Australian trust, 93.3

- defined, 93.3(1)

Austria, *see also* Foreign government

- stock exchange recognized, 262
- universities, gifts to, Reg. Sch. VIII, s. 4

Author

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

Authorized foreign bank

- branch-establishment rollover, 142.7(3)
- branch interest tax, 218.2
- branch tax allowance, Reg. 808(8)
- capital tax rules, 181.3(3)(e), 181.3(4)(c), 190.13(d), 190.14(1)(c)
- conversion of Canadian affiliate to branch, 142.7
- debt of, qualified investment for deferred income plans, 146(1)*qualified investment*(b)(ii), 146.1(1)*qualified investment*(b)(ii), 146.3(1)*qualified investment*(b)(ii), 204*qualified investment*(b)(ii)
- deemed resident in Canada for withholding tax rules, 212(13.3)

Index

- Authorized foreign bank (*cont'd*)
 - defined, 248(1)
 - foreign tax credit, 126(1.1)
 - interest deduction, 18(1)(v), 20.2
 - payments to, non-resident tax
 - no withholding tax [before Aug. 8/09], Reg. 105(2)(b), 800, 803.1
 - tax payable directly [before Aug. 8/09], Reg. 801–803.1
 - reassessment beyond 4-year deadline, 152(4)(b)(iii.1)
 - taxable income earned in Canada, 115(1)(a)(vii)(B)
 - winding up into, Reg. 9204(2.1)
- Authorized person**
 - defined, re communication of taxpayer information, 241(10)
- Automobile**, *see also* Motor vehicle; Passenger vehicle
 - available to shareholder, benefit, 15(5), (7)
 - benefit related to operation of, includable in employee's income, 6(1)(a)(iii)
 - benefit related to use of, not includable in employee's income, 6(1)(a)(iii)
 - benefit to shareholder, 15(5)
 - capital cost allowance
 - exclusion, Reg. 1102(1)(h), 1102(11)–(13)
 - limitation, *see* Passenger vehicle: luxury
 - cost over \$34,000, *see* Passenger vehicle: luxury
 - cost over \$100,000, *see* Luxury Items Tax
 - dealer, taxable benefit to sales employees, 6(2.1)
 - defined, 248(1)
 - electric, *see* Zero-emission passenger vehicle; Zero-emission vehicle
 - employee's, capital cost allowance, Reg. 1100(6)
 - expenses
 - employee, of, 8(1)(h.1)
 - limitations on deductibility, 13(7)(g), (h), 18(1)(r), 67.2, 67.3
 - gasoline for, *see* operating costs (*below*)
 - insurance, *see* operating costs (*below*)
 - interest cost limit, *see* Passenger vehicle: luxury
 - lease expense limit, *see* Passenger vehicle: luxury
 - luxury, *see* Passenger vehicle: luxury
 - maintenance, *see* operating costs (*below*)
 - mechanic, *see* Apprentice: mechanic
 - operating costs
 - benefit
 - employee-owned car, 6(1)(l)
 - employer-owned car, 6(1)(k), Reg. 7305.1
 - shareholder, received by, 15(5)
 - deductible
 - by employee, 8(1)(h.1)
 - by employer, 9(1)
 - parking for, taxable benefit, 6(1)(a), 6(1.1)
 - payments by, non-resident withholding tax, 212(13.3)
 - provided to employee
 - amount included in income, 6(1)(e), (k), 6(2)
 - cost includes GST, 6(7)
 - provided to partner
 - amount included in income, 12(1)(y)
 - provided to shareholder
 - amount included in income, 15(5)
 - purchase loan to employee, 15(2.4)(d)
 - salesperson, standby charge for use of vehicle, 6(2.1)
 - short-term rental/leasing, for
 - capital cost allowance, Reg. Sch. II:Cl. 16
 - standby charge, 6(1)(e)
 - reasonable amount, 6(2)
 - salesperson, reasonable amount, 6(2.1)
 - trade-in, allocation of consideration, 13(33)
 - used by employee, 6(1)(e), (k), 6(2)
 - used by shareholder, 15(5)
 - used in employment
 - costs, 8(1)(j)
 - zero-emission, *see* Zero-emission passenger vehicle; Zero-emission vehicle
 - **Automotive equipment**
 - capital cost allowance, Reg. Sch. II:Cl. 10(a)
 - large trucks and tractors, Reg. Sch. II:Cl. 16(g)
 - **Automotive painter**
 - apprenticeship job creation credit, 127(9)“investment tax credit”
 - **Automotive service technician**
 - apprenticeship job creation credit, 127(9)“investment tax credit”
 - **Available-for-use rules**
 - capital cost allowance, 13(26)–(32), 20(28), (29), Reg. 1100(2)
 - transfer of property to affiliated person, 13(21.2)(e)(iv)
 - deduction against rental income, 20(28), (29)
 - investment tax credit, 127(11.2)
 - meaning of, 248(19)
 - scientific research, 37(1.2)
 - **Average Consumer Price Index**
 - defined, Reg. 8500(1)
 - **“Average wage” for calendar year**
 - defined, 147.1(1)
 - used in calculating money purchase limit, 147.1(1)“money purchase limit”
 - **Averaging of income**, *see also* Income-averaging annuity contract
 - forward, *see* Forward averaging
 - lump-sum payments, 110.2, 120.31
 - RRSPs, 146(5), (8)
 - by pledging RRSP as security, 146(7), (10)
 - shareholder loans, 15(2), 20(1)(j)
 - **Aviation fuel**, *see* Fuel tax rebate (1992–1999)
 - **Avoidance of tax**, *see* Anti-avoidance rules
 - **Avoidance transaction**
 - defined
 - for general anti-avoidance rules, 245(3)
 - for reportable transaction rules, 237.3(1)
 - reporting required, 237.3(2)
 - **Award**
 - legal expenses of collecting salary, etc.
 - included in employee's income, 6(1)(j)
 - personal injury
 - election re capital gains, 81(5)
 - income exempt, 81(1)(g.1), (g.2)
 - **Away-from-home expenses**, *see also* Special work site, employment at; Travelling expenses
 - railway employees, 8(1)(e)
 - transport employees, 8(1)(g)

B

 - **BAPA (Bilateral Advance Pricing Agreement)**, *see* Advance Pricing Agreement
 - **BDC Capital Inc.**
 - prescribed not to be a financial institution, Reg. 9000(b)
 - **BEPS**, *see* Base erosion and profit shifting, anti-avoidance rules
 - **BHP Billiton-South32 spinoff**, Reg. 5600(j)
 - **BIL**, *see* Business investment loss
 - **BN**, *see* Business Number
 - **BP Canada case overruled**, 237.5
 - **Baby bonus**, *see* Canada Child Benefit
 - **Babysitting**, *see* Child care expenses
 - **Back-door butterfly**, 88(1)(c)(vi), 88(1)(c.3), 88(1)(c.8)
 - **Backman case overruled**, 96(8)
 - **Back-to-back loans**
 - attribution rules, 74.5(6)

Index

- Back-to-back loans (*cont'd*)
 - loan by corporation to non-resident, 17(11.2)
 - non-resident withholding tax, 212(3.1)–(3.81)
 - shareholder loans, 15(2.16)–(2.192)
 - thin capitalization rules, 18(6), (6.1)
- Back-to-back royalties**
 - non-resident withholding tax, 212(3.9)–(3.94)
- Bad debt**
 - change in control of corporation, limitation on deduction, 111(5.3)
 - deductible, 20(1)(p)
 - deemed disposition of, 50(1)(a)
 - disposition of depreciable property, 20(4), (4.1)
 - disposition of (former) eligible capital property, 20(4.2)
 - insurer/moneylender
 - inclusion in income, 12.4
 - personal-use property, 50(2)
 - recovered
 - capital gain, 39(11)
 - income, 12(1)(i), (i.1)
 - restrictive covenant payment, 60(f)
 - uncollectible proceeds of disposition, 20(4)–(4.2)
 - where property seized by creditor, no deduction for principal, 79.1(8)
- Baker**
 - apprenticeship job creation credit, 127(9)“investment tax credit”
- Balance**
 - defined, for consequential reassessment, 152(4.4)
 - transfer of, to different CRA account, 221.2
- Balance disorder**
 - pressure pulse therapy device for, medical expense credit, Reg. 5700(z.4)
- Balance-due day**
 - amalgamated corporation, 87(2)(oo.1)
 - defined, 248(1)
 - for trust’s year-end triggered by change in beneficiaries, 251.2(7)
 - payment of tax by, 153(2), 155(1)(b), 156(1)(b), 156.1(1)“net tax owing”(b), 157(1)
- Balance of annuitized voluntary contributions**
 - defined, 60.2(2)
- Ballroom dancing relief (COVID)**, Reg. 8901.1(2)(b)(ix)(A)(V), *see also* Qualifying tourism or hospitality entity
- Bank**, *see also* Financial institution
 - account in foreign country, disclosure to CRA, 233.3
 - additional taxes on, 123.6 [annual], 191.5 [2022 only]
 - cannot make Canadian securities election, 39(5)(b)
 - defined, *Interpretation Act* s. 35(1)
 - exempt from Part IV tax, 186.1(b)
 - FAPI credit to offset Part XIII tax, 125.21
 - FAPI rule flexibility, 95(2.31), (2.43)–(2.45), (3.01)
 - foreign, *see* Authorized foreign bank; Foreign bank
 - interference with remittance of tax, 227(5.2)–(5.4) (1995 draft, abandoned)
 - liabilities of, determination for debt forgiveness reserve, 61.3(1)(b)C(ii)(B)
 - mark-to-market rules, 142.2–142.6
 - non-resident account reporting, *see* Common Reporting Standard
 - offshore, whether income is FAPI, 95(1)“investment business”(a)(i), 95(2.11)
 - receipt of tax payments by, 229 [repealed]
 - remittance of source withholdings by large employers, 153(1), (1.4), Reg. 110
 - Requirement for Information, electronic delivery of, 231.2(1.1)
 - reserves
 - continuation of, on amalgamation, 87(2)(g.1)
 - prescribed reserve amount, Reg. 8000(a), (a.1)
 - sperm, medical expense credit, 118.2(2)(v)
 - surtaxes on, 123.6 [annual], 191.5 [2022 only]
 - taxable income earned in a province, Reg. 404
- Bank for International Settlements**
 - no withholding tax on interest payable to, Reg. 806.1
- Bank or life insurer group member**
 - defined
 - for Canada Recovery Dividend (Part VI.2 tax), 191.5(1)
 - for surtax on banks and life insurers, 123.6(1)
 - surtax on, 123.6(2), 191.5(2)
- Banker’s acceptances**
 - included in capital for large corporations tax, 181.2(3)(d)
 - interest taxable to holder, 12(1)(c)
 - annual accrual, 12(4), (9)
 - qualified investments for deferred income plans, Reg. 4900(1)(i.2)
- Bankruptcy**
 - Act, *see Bankruptcy and Insolvency Act*
 - “bankrupt” defined, 248(1)
 - business income, effect on, 34.1(8)(b)
 - corporation
 - dividends paid to, effect on dividend refund, 129(1.1)
 - general rules, 128(1)
 - debt forgiveness rules inapplicable, 80(1)“forgiven amount”B(i)
 - effect on Crown’s priority for taxes withheld, 227(5)
 - “estate of the bankrupt” defined, 248(1)
 - individual
 - Canada Child Benefit, 122.61(3.1)
 - credits allowed, 118.95
 - GST credit, 122.5(7)
 - general rules, 128(2)
 - minimum tax not applicable, 127.55
 - tuition and education credit carryforward, 128(2)(f)(iv), 128(2)(g)(ii)
 - legislation, *see Bankruptcy and Insolvency Act*
 - receiver
 - return to be filed by, 150(3)
 - minimum tax carryover not applicable, 120.2(4)
 - withholding tax, 227(5), (5.1)
 - shares of corporation in, 50(1)
 - trustee in, *see also* Legal representative
 - clearance certificate, 159(2)
 - deemed to be legal representative, 248(1)“legal representative”
 - obligations of, 159
 - return required by, 150(3)
 - withholding tax, liability for, 227(5), (5.1)(f)
- Bankruptcy and Insolvency Act**
 - charge registered under, 223(11.1)
 - priority of garnishment order over, 224(1.2)
- Bare trust**, 104(1), *see also* Agent
 - requirement to disclose details to CRA, 150(1.3)
- Barrister and solicitor**, *see* Lawyer
- Bars relief (COVID)**, Reg. 8901.1(2)(b)(ii), *see also* Qualifying tourism or hospitality entity
- Base erosion and profit shifting, anti-avoidance rules**
 - action items (2015), 95 (proposed amendments)
 - country-by-country (CbC) reporting, 233.8
 - cross-border rules, Canada-U.S. Tax Treaty:Art. XXIX-A:2(e)
 - FAPI, 95(2)(a.1)–(b)
 - hybrid mismatch arrangements, *see* Hybrid mismatch arrangement
 - interest expense deduction
 - limited to 30% of EBITDA, 18.2, 18.21
 - thin capitalization, 18(4)–(8)
 - limitation on benefits, Canada-U.S. Tax Treaty:Art. XXIX-A
 - mandatory disclosure rules, 237.3–237.5
 - purpose test, MLI Art. 7(1)

Base erosion and profit shifting, anti-avoidance rules (*cont'd*)

- thin capitalization, 18(4)–(8)
- transfer pricing, 247

Base level deduction

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

Base percentage

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

Base taxation year (for OAS clawback)

- defined, 180.2(1)

Base year

- defined
- • for corporate inclusion of partnership income, 34.3(1)
- • for transitional rules for insurers (2023), 138(12), 142.51(1)

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

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

Basic activity of daily living

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

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

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

Basic oxygen furnace gas

- defined, Reg. 1104(13)

Bath tub

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

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

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

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

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

Bed

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

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

- keeping, constitutes farming, 248(1)“farming”

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

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

“Beneficially interested” in a trust

- meaning of, 248(25)

Beneficiary

- amounts deemed not paid to, 104(13.1), (13.2)
- amounts deemed payable to, 104(24), (29)
- arm's length from personal trust, deemed not to be, 251(1)
- capital cost allowance, deduction for, 104(16) [repealed]
- death of
 - • separate return on, 104(23)(d)
- deemed income of, 104(27), (28)
- deferred profit sharing plan, under, 147(17)
 - • when plan was employees' profit sharing plan, 147(11)
- defined, 18(5), 94(1), 108(1), 122(3), 146.6(1), 248(13), 251.1(3), 251.2(1), Reg. 8500(1)
- disposing of property previously held by trust
 - • reduction of loss, 107(6)
- emigration of, 128.1(10)“excluded right or interest”(j), (k)
- employees profit sharing plan, under, 144(6)–(8)
 - • former, refund to, 144(9)
- foreign tax credit, 104(22)–(22.4)
- immigration of, 128.1(10)“excluded right or interest”(j), (k)
- income of, 108(5)
- income payable to, 104(13)
- non-resident
 - • distribution of property to, 107(5)
 - • • instalment obligation not increased, 107(5.1)
 - • • security to postpone payment of tax, 220(4.6)–(4.63)
 - • dividends received on behalf of, 82(1)(e)
 - • estate income paid to, withholding tax, 212(1)(c)
 - • limitation on deduction in computing income of trust, 104(7)
 - • • trust income paid to, withholding tax, 212(1)(c)
- non-taxable dividends, designation re, 104(20)
- preferred
 - • defined, 108(1)
 - • election re accumulating income, 104(14)
 - • qualifying environmental trust, credit for, 127.41
- registered education savings plan, under, 146.1(1)“beneficiary”
- rights or things transferred to, 70(3)
- share of pension etc. benefits received by estate, 104(27)–(28)
- superannuation or pension benefit, share of, 104(27)
- taxable capital gain, designation by trust, 104(21)–(21.7)
- taxable dividends received by trust, designation re, 104(19)
- trust, of
 - • defined, 108(1)“beneficiary”
 - • depreciable property acquired with government assistance, 13(7.2)
 - • inducement payments or reimbursement received by, 12(2.1)
 - • to be reported to CRA starting 2022, Reg. 204.2(1)(a)

Benefit

- automobile available to shareholder, 15(5), (7)
- automobile operation, re, 6(1)(a)(iii), 6(2.2)
- conferred on person
 - • amount included in income, 56(2), 246(1)
 - • by charity, *see* Undue benefit
- conferred on shareholder, 15(1), (7), (9)
 - • loan forgiven, 15(1.2)
- death, *see* Death benefit
- deferred profit sharing plan, under, 147(10)–(10.2)
 - • defined, 248(1)
- defined
 - • Home Buyers' Plan, 146.01(1)
 - • Lifelong Learning Plan, 146.02(1)
 - • policy reserves in insurance business, Reg. 1408(1)
 - • registered retirement savings plan, 146(1)“benefit”
- employee benefit plan, 6(1)(g)
- employment, related to, 6(1)(a)
 - • automobile, 6(1)(e), (k), 6(2)
 - • exclusions from income, 6(1)(a)(i)–(v)
 - • GST included in benefit, 6(7)
 - • group term life insurance, 6(1)(a)(i), 6(4), Reg. 2700–2704

Index

Benefit (*cont'd*)

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

Benefit on death

- defined, Reg. 310, 1401(3)

Benefit provision

- defined, Reg. 8500(1)

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

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

Bequest, *see also* Death of taxpayer

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

Bermuda, *see also* Foreign government

- stock exchange recognized, 262

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

Beverages

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

Bifurcating an appeal, 171(2)

Bijuralism

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

Bilateral convention, *see* Tax treaty

Bill, post-dated, sale of, 20(1)(e), 248(1)“borrowed money”

Billed-basis accounting

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

Biogas

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

Bio-oil

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

Bison, 80.3(1)“breeding animals”

Bitumen development phase

- defined, Reg. 1104(2)

Bitumen mine development project

- defined, 66.1(6)

Bitumen upgrading development project

- defined, 66.1(6)

Bituminous sands

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

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

Bituminous sands equipment

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

Black liquor, *see* Spent pulping liquor

Blackburn Radio case overruled, 152(4)(b)(iii)(B)

Blast furnace gas

- defined, Reg. 1104(13)

Blended payment, interest and principal, 16(1)

- paid to non-resident, 214(2)

Blind person, *see also* Mental or physical impairment

- Braille note-taker
 - disability supports deduction, 64(a)(ii)(O)
 - medical expense credit, Reg. 5700(y)
- computer-operating aids
 - disability supports deduction, 64(a)(ii)(C)
 - medical expense, Reg. 5700(o)
- deaf-blind intervening services
 - disability supports deduction, 64(a)(ii)(M)
 - medical expense credit, 118.2(2)(l.44)
- devices to assist, business expense, 20(1)(rr)
- guide dog, expenses, 118.2(2)(l)
- parking paid by employer, not taxable benefit, 6(16)
- print-reading aids
 - disability supports deduction, 64(a)(ii)(D), (Q)
 - medical expense credit, Reg. 5700(l), (l.1)
- reading services
 - disability supports deduction, 64(a)(ii)(L)
 - medical expense credit, 118.2(2)(l.43)
- transportation paid by employer, not taxable benefit, 6(16)

Bliss symbol board

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

Block of shares

- defined, Reg. 4803(1)

Block of units

- defined, Reg. 4803(1)

Blocked currency

- FAPI reserve, 91(2)

Blocked currency (*cont'd*)

- income in, postponement of tax, 161(6)

Blocking deficits (FAPI)

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

Blood coagulation monitor

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

Blood relationship

- defined, 251(6)

Blood sugar

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

Board and lodging

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

Board of trade

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

Boat

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

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

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

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

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

Bone marrow transplant

- expenses of, tax credit for, 118.2(2)(1.1)

Bonus, *see also* Signing bonus

- cash, Canada Savings Bond, 12.1
 - information return, Reg. 220
- employment
 - unpaid, 78(4)
 - withholding of tax at source, 153(1)(a), Reg. 103

Bonus interest payment

- credit union, by
 - deduction, 137(2)
 - defined, 137(6)

Bonus payments

- employees, 5(1) (taxes as salary)

Book

- capital cost allowance for, Reg. Sch. II:Cl. 12(a)
- talking textbook, medical expense, *see* Talking textbooks

Bookkeeping services

- penalty for misrepresentation, 163.2(9)

Books and records, *see also* Documents

- destruction of, penalty, 239(1)
- inspections, 231.1
- outside Canada, 143.2(13), (14), 231.6
- political contributions, 230.1
- required to be kept, 230(1)
 - electronic records, 230(4.1), (4.2)
 - failure to keep, 230(3)
 - offence and penalty, 238(1)
 - lawyers, 230(2.1)
 - registered Canadian amateur athletic association, 230(2)
 - registered charity, 230(2)
 - retention of, 230(4)–(8), Reg. 5800
- transfer pricing, 247
- transfer pricing, for, contemporaneous, 247(4)

Boot, *see* Non-share consideration (boot)**Border residents**, *see* Commuter to United States**Borrowed money**, 20(2), (3)

- costs, capitalized, 21
- defined, 248(1)
- depreciable property, for, 21(3)
 - election to capitalize, 21(1)
- exploration/development, for, 21(4)
- extended meaning of, 20(2), (3)
- interest paid on, 20(1)(c)
- loss of source of income, 20.1(1)
- purposes used for, deemed, 20(2), 20(3), 20.1
- refinanced, 20.1(6)
- used to acquire partnership interest, 20.1(5)
- used to invest in RRSP, RDSP, RESP, PRPP or TFSA, no deduction for interest, 18(11)

Borrower

- defined, for interest deduction restrictions, 18.2(1)“exempt interest and financing expenses”

Borrowing

- allocations in proportion to
 - deduction, 137(2)
 - defined, 137(6)
- defined, for interest deduction restrictions, 18.2(1)“exempt interest and financing expenses”
- expense of, 20(1)(e)

Borrowing party

- defined, for upstream loan transitional rules, 39(2.1)

Bosnia

- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(a) [repealed]

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

Index

Bottle deposits

- taxable as income, 12(1)(a)(ii)
- • deduction when repaid, 20(1)(m.2)

Bounced cheque, *see* Cheque: dishonoured

Bounty payments, *see* Informant payments

Bourse de Montréal Inc.

- prescribed securities exchange investment, Reg. 9002.2(d)

Bovine animals

- breeding, 80.3(1)“breeding animals”
- inventory, valuation of, 28(1.2)

Brace (limb or spinal), as medical expense, 118.2(2)(i)

Brady bond

- excluded from mark-to-market rules, 142.2(1)“mark-to-market property”(e), Reg. 6209(b)(i), 9002(1)(d)
- reserve in respect of, Reg. 8006“specified loan”

Braille note-taker

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

Braille printer

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

Brambles-Recall spinoff, Reg. 5600(i)

Branch advance

- defined, 20.2(1)

Branch financial statements

- Canadian income of foreign bank calculated using, 115(1)(a)(ii)
- defined, 20.2(1)

Branch interest tax, 218.2

Branch tax, 219

- exemption for first \$500,000 of profits, Canada-U.S. Tax Treaty:Art. X:6(d)
- investment allowance, Reg. 219(1)(j), 808
- non-resident investment or pension fund, exclusion, 115.2
- tax treaty dividend rate limitation to apply, 219.2

Brant case overruled, 224(1.4), 227(4.3)

Breakdown of marriage, *see* Divorce and separation

Breakwater

- capital cost allowance for, Reg. Sch. II:Cl. 3, Sch. II:Cl. 6

Breast prosthesis

- medical expense, Reg. 5700(j)

Breeding animals/herd

- defined, 80.3(1)

Breeding bee stock

- defined, 80.3(1)
- tax deferral in drought or flood regions, 80.3(4.1)

Breeding bees, *see also* Breeding bee stock

- defined, 80.3(1)

Bribes

- no deduction for, 67.5

Bricklayer

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

Bridge

- capital cost, 13(7.5)(b), Reg. 1102(14.3)
- capital cost allowance for, Reg. Sch. II:Cl. 1(a)

Bridging benefits

- employment insurance income replacement benefits, 56(1)(r)(iv)
- pension income credit, 118(8.1)
- pensions, defined, Reg. 8500(1)

Britain, *see* United Kingdom

British Columbia, *see also* Province

- Forestry Revitalization Trust, *see* Forestry Revitalization Trust
- labour-sponsored venture capital corporation of

- • prescribed, Reg. 6700(a)(vi), (x), Reg. 6700.1
- logging tax, credit for, 127(1), (2), Reg. 700
- Mackenzie, northern resident deduction, Reg. 7303.1(2)(a)
- northern, *see* Northern Canada
- tax rates, *see* introductory pages
- Vancouver, international banking centre until 2013, 33.1(3)

British Commonwealth

- defined, *Interpretation Act* 35(1)

Broad participation retirement fund

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

Broadcaster

- prescribed person for Canadian film/video tax credit, Reg. 1106(7)

Broadcasting

- defined, *Interpretation Act* 35(1)
- royalties paid to U.S. resident, Canada-U.S. Tax Treaty:Art. XII:3(d)

Broadcasting undertaking

- foreign, defined, 19.1(4)
- limitation re advertising expenses, 19.1(1)

Broker, *see also* Registered securities dealer; Securities: dealer, trader or agent

- dividend received by
- • withholding tax, 153(4), (5)
- insurance, reserve for, 32(1)

Brother

- deemed not related on butterfly transaction, 55(5)(e)
- dependent, 118(6)(b)
- includes brother-in-law or in common-law, 252(2)(b)
- sharing of RESP assets, 204.9(5)(c)(ii)

Buccini case overruled, 7(1.7)

Budget surplus

- personal income tax cuts, 118(3.1)–(3.3) (Notes)

Building

- additions/alterations
- • capital cost allowance, Reg. Sch. II:Cl. 3, Sch. II:Cl. 6(i), Sch. II:Cl. 6(k)
- • class of property acquired, Reg. 1102(19)
- • disability-related
- • • deductible, 20(1)(qq)
- • • medical expense credit, 118.2(2)(1.2)
- capital cost allowance for, Reg. Sch. II:Cl. 1(q), Sch. II:Cl. 3, Sch. II:Cl. 6(a), Sch. II:Cl. 8
- • manufacturing or processing, used in, Reg. 1100(1)(a.1)
- • non-residential, additional allowance, *see* Eligible non-residential building
- construction, capitalization of soft costs, 18(3.1)–(3.7)
- deduction before available for use, 20(28), (29)
- mine, capital cost allowance, Reg. Sch. II:Cl. 10(g), Sch. II:Cl. 41
- multiple-unit residential, Reg. 1101(5b)
- • separate classes for capital cost allowance, Reg. 1101(5b)
- • non-residential, *see* Eligible non-residential building
- proceeds of disposition allocated between land and, 13(21.1), 70(5)(d)
- rent paid before acquisition, deemed CCA, 13(5.2)
- rental properties, limitation on CCA, Reg. 1100(11)–(14.2)
- scientific research expenditures, limitations, 37(8)(d)(i), (ii), Reg. 2900(11)
- scientific research expenditures on, 37(8)(d)
- separate class
- • multiple-unit residential building (acquired by 1987), Reg. 1101(5b)
- • rental property costing over \$50,000, Reg. 1101(1ac)–(1ae)
- • where non-residential use, Reg. 1101(5b.1), *see* Eligible non-residential building
- separate class, where cost over \$50,000, Reg. 1101(1ac), (1ad), (5b)
- special-purpose, defined, Reg. 2903

- Building (*cont'd*)
- when available for use, 13(28)
- Bump**
- denial rule, 88(1)(c)(vi)
 - of asset costs, on windup of corporation, 88(1)(d)
 - • amendment to bump designation, 88(1.8), (1.9)
- Burden of proof**
- on Minister
 - • failure to report capital gain resulting in denial of exemption, 110.6(6)
 - • penalty, 163(3)
 - on taxpayer challenging assessment, 152(7)
- Burial services**, *see* Eligible funeral arrangement; Funeral services
- Bursary**, *see* Scholarship
- Bus and truck operators**
- allocation of income among provinces
 - • corporation, Reg. 409
 - • individual, Reg. 2604
- Bus driver**
- expenses, 8(1)(g)
- Buses (charter) relief (COVID)**, Reg. 8901.1(2)(b)(vii), *see also* Qualifying tourism or hospitality entity
- Business**, *see also* Adventure in the nature of trade; Business or property income
- adjustment time, defined, 14(5) [before 2017]
 - carrying on in Canada
 - • extended meaning of, 253
 - • losses, *see* Non-capital loss; Loss(es)
 - • non-residents, 2(3)
 - cessation, *see* Ceasing to carry on business
 - defined, 248(1)
 - disposition of by proprietor, 25
 - expansion, 44(1), (5)
 - expenses, *see* Expenses
 - farming or fishing, 28
 - income from, *see also* Business or property income
 - • defined, 9(1)
 - • earned in a province, Reg. 2603
 - • • limitations, Reg. 2606
 - • home office expenses, conditions for deductibility, 18(12)
 - • more than one business, Reg. 2605
 - limit, *see* Business limit
 - losses, *see* Non-capital loss; Loss(es)
 - more than one
 - • income earned in a province, Reg. 2605
 - profits, 9(1), Canada-U.S. Tax Treaty:Art. VII
 - proprietor's income from, 11(1)
 - separate, *see* Separate business
 - small, *see* Small business corporation
 - termination of, *see* Ceasing to carry on business
 - transfer of, to corporation or spouse, 24(2)
- Business corporation, foreign**, *see* Foreign business corporation
- Business Development Bank of Canada**
- prescribed not to be a financial institution, Reg. 9000(a)
- Business entity**
- defined, for country-by-country reporting, 233.8(1)
- Business-income tax (foreign)**
- deduction for, 126(2), (2.1)
 - defined, 126(7)
 - • for trusts, 104(22.4)
- Business investment loss**
- allowable, *see also* Allowable business investment loss
 - • carryforward, 111(1)(a), 111(8)“non-capital loss”
 - • deduction for, 3(d)
 - bad debt, 50(1)(a)
 - change of control of corporation, rules, 111(8)“net capital loss”C(b)
 - deduction from, 39(9), (10)
 - meaning, 39(1)(c)
 - shares of bankrupt corporation, 50(1)(b), 50(1.1)
- Business limit**
- anti-avoidance rule, 125(9)
 - assignment of, to another corporation, 125(3.1), (3.2)
 - defined, 125(2)–(5.1), 248(1)
 - effect on enhanced investment tax credit, 127(10.2), 127.1(2)“qualifying corporation”
 - large corporation, 125(5.1)(a)
 - limits small business deduction, 125(1)(c)
- Business Number**, *see also* Social insurance number
- defined, 248(1)
 - disclosure to public, 241(9.3), (9.4)
 - holder of, disclosure of information to other governments, 241(4)(l)
 - other governments required to use to permit disclosure of information, 241(9.2)
 - penalty for failure to provide, 162(6)
 - provision of, to provinces and other government departments, 241(4)(l)
 - regulations requiring provision of, 221(1)(d.1)
 - requirement to provide, 237(1.1), (2)
 - • tax shelter information return, 237.1(7)
- Business or property income**, 12
- accrued interest on debt obligation, 12(3), (4), (9)
 - amounts received for services to be rendered etc., 12(1)(a), 12(2)
 - automobile provided to partner, 12(1)(y)
 - bad debts recovered, 12(1)(i), (i.1)
 - benefits from estates, trusts, etc., 12(1)(m)
 - deductions from
 - • not allowed, 18
 - • permitted, 20(1)
 - dividends, 12(1)(j), (k)
 - eligible capital amount to be included, 14(1) [before 2017]
 - employee benefit plan
 - • amounts received from, 12(1)(n.1)
 - employee trust, amounts received, 12(1)(n)
 - employees profit sharing plan, amounts received from, 12(1)(n)
 - employment tax deduction, 12(1)(q)
 - energy conversion grant, 12(1)(u)
 - forfeited amounts under salary deferral arrangements, 12(1)(n.2)
 - home insulation grant, 12(1)(u)
 - inducement payments, 12(1)(x)
 - • prescribed amount, Reg. 7300
 - • received by beneficiary of trust, or partner, 12(2.1)
 - insurance proceeds expended, 12(1)(f)
 - interest, 12(1)(c)
 - inventory adjustment, 12(1)(r)
 - investment tax credit, 12(1)(t)
 - life insurance policies, accumulating fund, 12.2
 - partnership, 12(1)(l)
 - payments based on production or use, 12(1)(g)
 - personal services business
 - • loan from employer, 12(1)(w)
 - reimbursement, 12(1)(x)
 - • prescribed amount, Reg. 7300
 - • received by beneficiary of trust, or partner, 12(2.1)
 - reserves
 - • certain goods and services, for, 12(1)(e)
 - • doubtful debts, for, 12(1)(d)
 - • guarantees etc., for, 12(1)(d.1)
 - • quadrennial survey, for, 12(1)(h)
 - retirement compensation arrangement, amounts received under, 12(1)(n.3)

Index

- Business or property income (*cont'd*)
- scientific research deduction, 12(1)(v)
- services rendered, amounts receivable for, 12(1)(b), 12(2)
- western grain stabilization payments, 12(1)(p)

Business property, *see* Former business property

Butterfly denial rules, 55(3.1)

Butterfly transaction, 55(3)(b)

- back-door rule, 88(1)(c)(vi), 88(1)(c.3), 88(1)(c.8)
- capital gains exemption disallowed, 110.6(7)(a)
- definitions, 55(1)
- excluded from capital gains strip rules, 55(3)(b)
- • exception for purchase butterfly, 55(1)“permitted exchange”, (3.1), (3.2)
- • no acquisition of control on spin-off distribution, 256(7)(a)(i)(E)

Buyback tax, *see* Stock buyback tax

Buy-sell agreement

- tax indemnity does not trigger mandatory reporting rules, 237.3(1)“contractual protection”(a)(ii)(B)

C

CAI (Climate Action Incentive), 122.8

CAIS, *see* Canadian Agricultural Income Stabilization program

CCA, *see* Capital cost allowance

CCB, *see* Canada Child Benefit

CCDE, *see* Cumulative Canadian development expense

CCOGPE, *see* Cumulative Canadian oil and gas property expense

CCPC, *see* Canadian-controlled private corporation

CCPC rate reduction percentage

- defined, 123.4(1)

CCRA (Canada Customs & Revenue Agency), *see* Canada Revenue Agency

CCT, *see* Character conversion transaction

CCTB [Canada Child Tax Benefit], *see* Canada Child Benefit

CCUS, *see* Carbon capture, utilization and storage

CCUS process

- defined, Reg. 1104(2)
- • Dept. of Natural Resources technical guide applies, 13(18.2)

CCUS project

- defined, 127.44(1), Reg. 1104(2)

CCUS tax credit

- climate risk disclosure report must be published, 211.93, Reg. 8200.4
- deducted from tax, 127.44(2)
- defined, 127.44(5)
- expenditures unpaid after 180 days, 127.44(11)
- investment tax credit, 127.44(5)
- knowledge sharing required, 211.92
- partnership, allocation to partners, 127.44(10)
- refundable credit, 127.44(3)

CD, *see* Audio tapes or CDs; Capital dividend; Commencement day

CDA, *see* Capital dividend account

CDE, *see* Canadian development expense

CDS Innovations Inc.

- website postings required by publicly traded partnerships, Reg. 229.1
- website postings required by publicly traded trusts, Reg. 204.1

CDSB, *see* Canada Disability Savings Bond

CDSG, *see* Canada Disability Savings Grant

CEC, *see* Cumulative eligible capital

CEDC, *see* Community Economic Development Corporation (Nova Scotia)

CEDOE, *see* Canadian exploration and development overhead expense

CEE, *see* Canadian exploration expense

CERB, *see* Canada Emergency Response Benefit (CERB)

CERS, *see* Canada Emergency Rent Subsidy

CESG, *see* Canada Education Savings Grant

CEWS, *see* Canada Emergency Wage Subsidy (CEWS)

CFA, *see* Cash flow adjustment; Controlled foreign affiliate

CFVPC, *see* Canadian film or video production certificate

CH, *see* Clean hydrogen

CHF, *see* Canadian investment fund

CIDA, *see* Canadian International Development Agency

CMETC, *see* Critical Mineral Exploration Tax Credit

CNIL, *see* Cumulative net investment loss

COGPE, *see* Canadian oil and gas property expense

COIN, *see* Canadian option interest note

COVID-19

- air quality improvement credit, 127.43
- automobile operating expenses relief, 6(2.2)
- automobile standby charge relief, 6(2.3)
- Canada Emergency Rent Subsidy, 125.7(2.1)
- Canada Emergency Wage Subsidy, 125.7(2) (*see* Canada Emergency Wage Subsidy (CEWS))
- child care expense need not be to earn income, 63(3.1)(a)
- deferred salary leave plan relief, Reg. 6801.1
- disability supports deduction need not be to earn income, 64.01(a)
- earned income for child-care and disability support includes COVID-19 support, 63(3.1)(b), 64.01(b)
- emergency Child Tax Benefit for May 2020, 122.61(1.01)
- emergency GST Credit for 2020, 122.5(3.001)
- emergency wage subsidy for employers
- • 10% (applied to source withholdings), 153(1.02)–(1.04)
- • 75% (paid by CRA), 125.7 (*see* Canada Emergency Wage Subsidy (CEWS))
- employee benefits, 6(1)(a) (Announced Administrative Change)
- flow-through share rules extensions, 66(12.6001), (12.731), 211.91(2.1)
- home office expenses, 8(13) (Announced Administrative Change)
- lockdown support, 125.7(2.1)B
- reduced minimum amount
- • for RRIF, 146.3(1.4), (1.5)
- • for variable benefits under pension plan, Reg. 8506(7.1)
- registered pension plan relief
- • borrowing permitted, Reg. 8502(i.1)
- • eligible period of reduced pay, Reg. 8500(1.3)
- • retroactive benefits for 2019, Reg. 8308(4.1)
- • retroactive contributions for 2019, Reg. 8308(5.1)
- • retroactive contributions for 2020–21, Reg. 8308(5.2), (5.3)

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

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

CRA, *see* Canada Revenue Agency

CRB, *see* Canada Recovery Benefit (CRB)

CRCB, *see* Canada Recovery Caregiving Benefit

CRCE, *see* Canadian renewable and conservation expense

CRD, *see* Climate risk disclosure report

CRHP, *see* Canada Recovery Hiring Program

CRIC

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

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

CSIS, *see* Canadian Security Intelligence Service

CSM, *see* Contract service margin

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

- CSST payment**, *see* Workers' compensation payment
- CTSP**, *see* Computer tax shelter property
- CUEC**, *see* Cumulative unused excess capacity
- CWLB**, *see* Canada Worker Lockdown Benefit
- CWB**, *see* Canada Workers Benefit; Canadian Wheat Board
- Cabinetmaker**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Cable**
- fibre optic, capital cost allowance, Reg. Sch. II:Cl. 42
 - included in definition of “telecommunication”, *Interpretation Act* 35(1)
 - systems interface equipment, Reg. Sch. II:Cl. 10(v)
- Caisse populaire**, *see* Credit union
- Calcium chloride**
- extraction of, 248(1)“mineral resource”(d)(ii)
 - included in definition of “mineral”, 248(1)
- Calculating currency**
- defined, for FAPI rules, 95(1)
- Calculation period**
- defined, 20.2(1)
- Calendar year**
- defined, *Interpretation Act* 37(1)(a)
 - taxation year described by reference to, 249(1.1)
- Camp, expenses of**
- deductible as child care expenses, 63(3)“child care expense”
 - not deductible, 18(1)(l)(i)
- Campsites relief (COVID)**, Reg. 8901.1(2)(b)(x)–(xii), *see also* Qualifying tourism or hospitality entity
- Canada**
- defined, 255, *Income Tax Conventions Interpretation Act* 5, *Interpretation Act* 35(1), Canada-U.S. Tax Treaty:Art. III:1(a)
 - application to continental shelf, *Interpretation Act* s. 8(2.2)
 - application to exclusive economic zone, 37(1.3), *Interpretation Act* s. 8(2.1)
 - government of, *see* Government
 - incorporated in, defined, 248(1)“corporation”, “corporation incorporated in Canada”
 - resident of, *see* Resident of Canada
- Canada Business Corporations Act**
- disclosure of corporate shareholders, *see* Individuals with Significant Control (of corporations)
- Canada Caregiver Credit (infirm adult dependant)**, 118(1)B(d)
- Canada Child Benefit**, 122.6–122.63, *see also* Universal Child Care Benefit (pre-July 2016)
- agreement with province to vary amount, 122.63
 - amount of, 122.61(1)
 - attribution rules inapplicable to amounts paid, 74.1(2)
 - change in spousal status, notice to CRA required, 122.62(5)–(8)
 - confidentiality of information, 241(4)(j.2)
 - definitions, 122.6
 - eligible individual, 122.6, 122.62, Reg. 6300–6302
 - not to be assigned, attached, garnished, etc., 122.61(4)
 - overpayment of, 160.1(1)
 - no interest on, 160.1(1)(b), 160.1(3)
 - part-year residents, 122.61(3)
 - reversionary trust rules inapplicable to amounts put in trust, 75(3)(d)
 - young child supplement, 122.61(1.2)
- Canada Child Tax Benefit**, *see* Canada Child Benefit
- Canada Customs and Revenue Agency**, *see* Canada Revenue Agency
- Canada Deposit Insurance Corporation**, *see also* Deposit insurance corporation
- bonds, etc. issued by
 - interest deemed not from Government of Canada, 212(15)
 - subject to tax, 27(2), Reg. 7100
- Canada Disability Savings Act**, *see also* Registered disability savings plan (RDSP)
- amounts paid under, 146.4(4)(n)
 - Canada Disability Savings Bond, 7
 - Canada Disability Savings Grant, 6
 - disclosure of information for administration of, 241(4)(d)(vii.5)
 - repayment of RDSP amount under, deductible, 60(z)
 - text of, 146.4 (Notes)
- Canada Disability Savings Bond**, *see* Canada Disability Savings Act
- Canada Disability Savings Grant**, *see* Canada Disability Savings Act
- Canada Education Savings Act**
- disclosure of information for purposes of administration of, 241(4)(d)(vii.1)
 - grant under, *see* Canada Education Savings Grant
 - revocation of RESP for failure to comply with, 146.1(12.1)
 - text of, 146.1 (Notes)
- Canada Education Savings Grant**
- not a contribution to RESP, 146.1(1)“contribution”
 - repayment of, deduction, 60(x)
- Canada Elections Act**
- candidates and parties under
 - political contribution credit, 127(3)
 - records re monetary contributions, 230.1
- Canada Emergency Rent Subsidy**, 125.7(2.1)
- amalgamation, effect of, 87(2)(g.6)
 - assessment or determination of, 152(1)(b), 152(3.4)
 - disclosure of claimant names to public, 241(3.5)
 - lockdown support, 125.7(2.1)B
 - penalty for amount overclaimed, 163(2)(i), 163(2.901)
 - sale of business, effect of, 125.7(4.1), (4.2)
 - subsidy can be paid by CRA at any time, 164(1.6), (1.61)
- Canada Emergency Response Benefit (CERB)**, 56(1)(r) [Notes]
- disclosure by CRA for purposes of administration, 241(4)(d)(vii.6)
 - included in income, 56(1)(r)(iv), (iv.1)
 - repayment of, deductible, 60(n), (v.3)
- Canada Emergency Student Benefit (CESB)**, 56(1)(r) [Notes]
- repayment of, deductible, 60(n), (v.3)
 - taxable, 56(1)(r)(iv), (iv.1)
- Canada Emergency Wage Subsidy (CEWS)**, 125.7, Reg. 8901.1, 8901.2
- amalgamation, effect of, 87(2)(g.6)
 - assessment or determination of, 152(1)(b), 152(3.4)
 - cannot claim both CRHP and CEWS, 125.7(9.2)
 - disclosure of employer names to public, 241(3.5)
 - dividends paid, disqualifies company, 125.7(2.01)
 - penalty for amount overclaimed, 163(2)(i), 163(2.901)
 - repayment where public corp executive compensation too high, 125.7(14), (14.1)
 - sale of business, effect of, 125.7(4.1), (4.2)
 - subsidy can be paid by CRA at any time, 164(1.6), (1.61)
- Canada Employment and Immigration Commission**
- costs of appealing decision of, deductible, 60(o)
- Canada Employment Credit**, 118(10)
- Canada Employment Insurance Commission**
- employment insurance benefits, *see* Employment insurance
 - financial assistance from, taxable, 56(1)(r)
- Canada Gazette**
- regulations to be published in, 221(2)
- Canada Grain Act**, 76(5)
- cash purchase ticket under, 76(4)
- Canada Housing Benefit**, *see* Rental Housing Benefit Act

Index

Canada Mortgage and Housing Corporation

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

Canada–Newfoundland Atlantic Accord Act

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

Canada–Nova Scotia Offshore Petroleum Resources Accord

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

Canada Oil Substitution Program, *see* Energy: conversion grant

Canada Pension Plan / Quebec Pension Plan

- amount payable by taxpayer under, collection of, 223(1)(c)
- assignment of pension under, 56(2)
- • excluded from attribution rules, 74.1(1)
- benefits taxable
- • election to pay tax attributable to earlier years, 56(8), 120.3
- • information return required, Reg. 200(1)
- • non-resident, 212(1)(h)(ii) [repealed], 217
- • resident of Canada, 56(1)(a)(i)(B)
- • withholding at source, 153(1)(b)
- constitutes earned income for RRSP, 146(1)“earned income”(b.1)
- contributions
- • by employee, as employer, deduction for, 8(1)(l.1)
- • collection of debt by US Internal Revenue Service, Canada-U.S. Tax Treaty:Art. XXVI-A:9
- • credit for, 118.7
- • enhanced, deduction for, 60(e.1)
- • • payroll withholding reduced, Reg. 100(3)
- • self-employed earnings
- • • credit for half, 118.7
- • • deduction for half, 60(e)
- costs of appealing decision under
- • deductible, 60(o)
- • recovery of, income, 56(1)(l)(iii)
- death benefit, taxable, 56(1)(a)(i)(F), 56(1)(a.1)
- disability pension
- • election to pay tax attributable to earlier years, 56(8), 120.3
- • included in earned income
- • • for RRSP purposes, 146(1)“earned income”(b.1)
- • • for child care expenses, 63(3)“earned income”(d)
- • disclosure of confidential information for purposes of, 241(3)(b), 241(4)(a), 241(4)(e)(iii)
- emigration of taxpayer, no deemed disposition, 128.1(10)“excluded right or interest”(g)(i)
- employer’s source deductions, failure to remit, 227(9.1)
- excluded from pension credit, 118(8)(b)
- non-resident withholding tax, 212(1)(h)
- • U.S. residents, Canada-U.S. Tax Treaty:Art. XVIII:5
- repayment of overpayment under, deduction for, 60(n)
- retirement pension under
- • assignment of, not subject to attribution, 74.1(1)
- transfer of rights to pension under, 56(4)

Canada Pension Plan Investment Board

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

Canada Recovery Benefit (CRB), 56(1)(r) [Notes]

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

Canada Recovery Caregiving Benefit, 56(1)(r) [Notes]

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

- repayment of, deductible, 60(n), (v.3)

Canada Recovery Dividend (surtax on banks and life insurers for 2022), 191.5(2)

- administrative provisions, 191.6
- allocation of \$1 billion deduction, 191.5(5)–(7)
- amalgamation, effect of, 87(2)(xx)
- interest on unpaid portion, 161(1)
- multiple taxation years in 2020, 2021 or 2022, 191.5(3), (4)
- return required, 191.5(8)
- tax payable over 5 years, 191.5(9)

Canada Recovery Hiring Program, 125.7(2.2)

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

Canada Recovery Sickness Benefit, 56(1)(r) [Notes]

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

Canada Revenue Agency

- account numbers, *see* Business Number
- audit, *see* Audit
- collection action, *see* Collection of tax
- created, *Canada Revenue Agency Act* 4(1)
- delegation of powers to officials of, 220(2.01)
- employees of, 220(2), (2.01)
- fairness package, *see* Taxpayer relief
- informant program, *see* Informant payments
- official of, interference with, 231.5(2)
- operations of, 220(1)
- procedures not followed, assessment still valid, 166
- refund payable by, *see* Refund
- staff, discipline of, communication of information for, 241(4)(h), 241(4.1)
- tax withheld, held in trust for, 227(4)–(4.2)
- taxpayer relief, *see* Taxpayer relief
- transfers between tax accounts, 221.2
- waiver of interest and penalty, 220(3.1)

Canada Safeway case overruled, 12(1)(x)(iv)

Canada Savings Bond

- cash bonus on, 12.1
- • information return, Reg. 220

Canada Shipping Act, *see also* Vessel

- quadrennial survey under, reserve for, 20(1)(o), Reg. 3600
- vessel, defined under, 13(21)

Canada Student Financial Assistance Act

- interest paid under, credit for, 118.62
- loan forgiven to doctor or nurse practising in remote region, no tax, Reg. 7300(c)

Canada Student Loans Act

- interest paid under, credit for, 118.62
- loan forgiven to doctor or nurse practising in remote region, no tax, Reg. 7300(c)

Canada Training Credit, 122.91

- assessment of, 152(1)(b)
- reduces tuition credit, 118.5(1.2)

Canada–U.K. Tax Convention, *see* Table of Contents

Canada–U.S. auto pact

- payments received, income, 56(1)(a)(v)

Canada–U.S. Tax Convention

- prescribed provision for elections, Reg. 7400(1)
- text, *see* Table of Contents

Canada Worker Lockdown Benefit

- disclosure of taxpayer information for administration of, 241(4)(d)(vii.7)–(vii.9)
- included in income, 56(1)(r)(iv.1)(D.1)

Index

- Canada Worker Lockdown Benefit (*cont'd*)
 - • withholding of tax at source, Reg. 100(1)“remuneration”(h), 103(4.1), 103(6)(h)
 - repayment of, deductible, 60(n)
- Canada Workers Benefit (former Working Income Tax Benefit)**, 122.7
 - advance payment, 122.7(7)
 - credit on tax return, 122.7(2), (3)
- Canadian**
 - defined, for Canadian film credit certificate, Reg. 1106(1)“Canadian”
- Canadian affiliate**
 - of foreign bank, defined, 142.7(1)
- Canadian Agricultural Income Stabilization program**
 - replaces NISA, 248(1)“net income stabilization account” (Notes)
- Canadian Airlines International Limited**
 - rescue package, *see* Fuel tax rebate
- Canadian amateur athletic association**, *see also* Registered Canadian amateur athletic association
 - business activities of, 149.1(6.01)
 - defined, 149.1(1)
 - political activities of, 149.1(6.201)
 - refusal to register
 - • appeal from, 172(3)(a), 180
 - registered, *see* Registered Canadian amateur athletic association
 - registration
 - • refusal by Minister
 - • • deemed, 172(4)(a)
 - resources of, devoted to amateur athletics, 149.1(6.1)
- Canadian art**, *see also* Cultural property
 - whether CCA allowed, Reg. 1102(1)(e)
- Canadian assets (of financial institution)**
 - defined, 181(2), 190(1.1), Reg. 8600, 8603
- Canadian banking business**
 - defined, 248(1)
- Canadian Broadcasting Corporation**
 - subject to tax, 27(2), Reg. 7100
- Canadian benefits**
 - defined, 217(1)
- Canadian business property**
 - defined, Reg. 2400(1)
- Canadian citizen**
 - CRA cannot collect U.S. tax from, Canada-U.S. Tax Treaty:Art. XXVI-A:8(a)
 - meaning of, 19(5.1)
 - ownership of Canadian newspaper for advertising expenses, 19(5)“Canadian newspaper”(a)
- Canadian Coast Guard Auxiliary**
 - volunteers, tax credit, 118.07
- Canadian Commercial Corporation**
 - contract payment from, investment tax credit, Reg. 4606
- Canadian-controlled private corporation**
 - corporation becoming
 - • deemed year-end, 249(3.1)
 - • general rate income pool addition, 89(4)
 - corporation ceasing to be
 - • deemed year-end, 249(3.1)
 - • low rate income pool addition, 89(8)
 - defined, 125(7), 248(1)
 - dividend refund, 129(1), (3)(a)
 - due date for balance of tax, 248(1)“balance-due day”(d)(i)
 - employee stock options in, 7(1.1)
 - existing since before 1972, ITAR 50
 - gain on shares of, capital gains exemption, 110.6(2.1)
 - instalments quarterly, 157(1.1)–(1.5)
 - investment tax credit
 - • additional credit, 127(10.1)
 - • refund of credit, 127.1
 - loss on share or debt of, 39(1)(c)
 - reassessment deadline 3 years, 152(3.1)
 - small, *see* Small-CCPC
 - small business deduction, 125(1)
- Canadian corporation**
 - corporation ceasing to be, tax on, 219.1
 - defined, 89(1)“Canadian corporation”
 - taxable, defined, 89(1)“taxable Canadian corporation”
 - winding-up of, 88(1)
 - • rules, 88(2)
- Canadian Cultural Property Export Review Board**, *see also* Cultural property
 - communication of information to, 241(4)(d)(xii)
 - determination of cultural property, 39(1)(a)(i.1), 110.1(1)(c), 118.1(1)“total cultural gifts”
 - determination of value of cultural property, 118.1(10), (11)
 - • appeal of determination, *Cultural Property Export and Import Act* 33.1
 - • determination applies for 2 years, 118.1(10.1)
- Canadian currency year**
 - defined, for functional currency rules, 261(1)
- Canadian development expense**, *see also* Resource expenses
 - borrowed money
 - • capitalization of interest, 21(2), (4)
 - • • reassessment, 21(5)
 - conversion to Canadian exploration expense on renunciation before 2019, 66(12.601), (12.602)
 - cumulative
 - • amount to be included in income, 66.2(1)
 - • deduction for, 66.2(2)
 - • • short taxation year, 66(13.1)
 - • deemed, 66.2(8)
 - • defined, 66.2(5)
 - • partner’s share, 66.2(6), (7)
 - • successored, deduction for, 66.7(4)
 - defined, 66.2(5)
 - designation re
 - • where not made, 66.5(1)
 - flow-through of, to shareholder, 66(12.62)
 - minimum tax, 127.52(1)(e), (e.1)
 - partnership, of
 - • election to exclude, 66.2(5)“Canadian development expense”(f)
 - • prescribed, Reg. 1218
 - • reclassified as Canadian exploration expense, 66.7(9)
 - • expenses for preceding years, 66.1(9)
 - • “restricted expense” defined, 66.1(6)
 - • successor corporation, 66.7(9)
 - renunciation of, 66(12.601) [before 2019], (12.62), (12.73)
 - • adjustment, statement to be filed re, 66(12.73)
 - • conversion to Canadian exploration expense before 2019, 66(12.601), (12.602)
 - • effect of, 66(12.63)
 - • excessive, penalty for, 163(2.2)
 - • form to be filed by corporation, 66(12.7)
 - • • late filing, 66(12.74), (12.75)
 - • partnership, return to be filed, 66(12.69)
 - • • late filing, 66(12.74), (12.75)
 - • restriction on, 66(12.67), (12.71)
 - successor corporation, rules, 66.7(4)
 - • application, 66.6(1)
 - Canadian Emergency Business Account**
 - forgivable loan, taxable, 12(1)(x)(iv)
 - Canadian equity property**
 - defined, Reg. 2400(1)

Index

Canadian exploration and development expenses, *see also* Exploration and development expenses

- borrowed money
- interest capitalized, 21(2), (4)
- reassessment, 21(5)
- computation of, 66(12)
- deduction for, 66(1)–(3)
- defined, 66(15)
- limitations of, 66(12.1)
- principal-business corporation, 66(1)
- successor corporation, rules, 66.7(1)
- application, 66.6(1)
- taxpayers other than principal-business corporations, 66(3)
- unitized oil or gas field, 66(12.2), (12.3)

Canadian exploration and development overhead expense, Reg. 1206(1)

Canadian exploration expense, *see also* Exploration and development expenses; Resource expenses

- borrowed money
- capitalization of interest, 21(2), (4)
- reassessment, 21(5)
- certificate re oil/gas well ceasing to be valid, 66.1(10)
- cumulative
- amount included in, income, 66.1(1)
- deduction for, 66.1(3)
- deduction from income, 66.1(2), (3)
- defined, 66.1(6)
- other than principal-business corporation
- deduction from income, 66.1(3)
- partner's share, 66.1(7)
- principal-business corporation
- deduction from income, 66.1(2)
- trust of, reduced by investment tax credit, 127(12.3)
- defined, 66.1(6)
- flow-through of, to shareholder, 66(12.6)
- expenses in first 60 days of year, 66(12.66)
- minimum tax, 127.52(1)(e), (e.1)
- prescribed, Reg. 1217
- reclassification of Canadian development expense as, 66.7(9)
- “restricted expense” defined, 66.1(6)
- “specified purpose” defined, 66.1(6)
- renunciation of, 66(12.6)
- adjustment, statement to be filed, 66(12.73)
- effect of, 66(12.61)
- excessive, penalty for, 163(2.2)
- form to be filed by corporation, 66(12.7)
- late filing, 66(12.74), (12.75)
- non-arm's length partnership, 66(17)
- partnership, return to be filed, 66(12.69)
- late filing, 66(12.74), (12.75)
- restriction on, 66(12.67), (12.71)
- successor corporation, rules, 66.7(3)
- application, 66.6(1)

Canadian field processing

- defined, 248(1)
- excluded from manufacturing and processing
- for Class 29 CCA, Reg. 1104(9)(k)
- ineligible for M&P credit, 125.1(3)“manufacturing or processing”(k)
- property for use in, investment tax credit, 127(9)“qualified property”(c)(ix)
- property used for, capital cost allowance, Reg. Sch. II:Cl. 29(a)(ii), Sch. II:Cl. 41(c), (d)

Canadian film or video production

- capital cost allowance offsetting income from, Reg. 1100(1)(m)
- defined, 125.4(1), Reg. 1106(4)
- separate CCA class, Reg. 1101(5k.1), Reg. Sch. II:Cl. 10(x)

Canadian film or video production certificate

- defined, 125.4(1)
- disclosure of information to public, 241(3.3)
- revocation of, 125.4(6)
- tax credit where issued, 125.4(3)

Canadian film or video tax credit, 125.4, *see also* Canadian film or video production; Film or video production services credit

- amalgamation of corporations, 87(2)(j.94)
- prescribed person, Reg. 1106(7)
- refund of credit before assessment, 164(1)(a)(ii)
- tax shelter investment excluded, 125.4(4)

Canadian financial institution

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

Canadian Forces and veterans

- allowances not income, 6(1)(b)(ii), (iii)
- clothing allowance exempt, 81(1)(d.1)
- death benefit exempt, 81(1)(d.1)
- detention benefit exempt, 81(1)(d.1)
- disability award exempt, 81(1)(d.1)
- earnings loss benefit taxable, 6(1)(f.1)
- high-risk missions, income exemption, 110(1)(f)(v)
- no source withholding, Reg. 102(6)
- income support benefit exempt, 81(1)(d.1)
- members deemed resident in Canada, 250(1)(b), 250(2)
- pension income credit, 118(3)(B)(b)(ii)
- pension income splitting, 60.03(1)“eligible pension income”(c)
- permanent impairment allowance taxable, 6(1)(f.1)
- service-related injuries, payments exempt, 81(1)(d.2)
- supplementary retirement benefit taxable, 6(1)(f.1)
- travelling and separation allowances, not income, 6(1)(b)(ii)

Canadian government film agency

- defined, Reg. 1106(1)
- disclosure of tax information to, 241(4)(d)(xv)
- prescribed person for Canadian film/video tax credit, Reg. 1106(10)(d)

Canadian group member

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

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

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

Canadian Home Insulation Program, *see* Home insulation grant

Canadian indebtedness

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

Canadian International Development Agency

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

Canadian investment fund

- defined, Reg. 2400(1)

Canadian investment income

- defined, 129(4) [repealed]

Canadian investment property

- defined, Reg. 2400(1)

Canadian investor

- defined, 115.2(1)

Canadian labour expenditure

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

Canadian life investment income, defined, 211.1(3)

Canadian manufacturing and processing profits

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

Canadian National Railway, *see also* Railway

Canadian newspaper

- defined, 19(5)

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

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

Canadian option interest note

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

Canadian ordinary income

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

Canadian outstanding premiums

- defined [repealed], Reg. 2400(1)

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

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

Canadian premiums

- defined, Reg. 8600

Canadian property, *see also* Foreign property

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

Canadian property mutual fund investment

- defined, 218.3(1)

Canadian property mutual fund loss

- defined, 218.3(1)

Canadian Radio-television and Telecommunications Commission

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

Canadian real, immovable or resource property

- defined, 248(1)

Canadian renewable and conservation expense

- capital cost allowance disallowed, Reg. 1102(1)(a.1)
- defined, 66.1(6), Reg. 1219

- included in CEE, 66.1(6)“Canadian exploration expense”(g.1)

Canadian reserve liabilities

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

Canadian resident partnership, *see also* Canadian partnership

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

Canadian resource expenses

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

Canadian resource profits

- defined, Reg. 5202

Canadian resource property

- acquisition from exempt person, 66.6
- amalgamation — partnership property, 66.7(10)(j), 66.7(10.1)
- amount designated re
- “outlay” or “expense”, 66(15)“outlay” or “expense”
- constitutes taxable Canadian property for certain purposes, 248(1)“taxable Canadian property”(n)(i)
- defined, 66(15)
- disposition of
- by non-resident
- certificate, 116(5.2)
- purchaser liable for tax, 116(5.2)
- rules, 116(5.1)
- treaty-protected property, 116(5.01), (5.02)
- effect on successor rules, 66.7(14)
- no capital gain, 39(1)(a)(ii)
- no capital loss, 39(1)(b)(ii)
- “eligible property” for transfer to corporation by shareholder, 85(1.1)(c)
- in corporation, share is taxable Canadian property, 248(1)“taxable Canadian property”(e)(i)(B), (ii)(B)
- in partnership, constitutes taxable Canadian property, 248(1)“taxable Canadian property”(g)(ii)
- non-resident’s income earned on, 115(4)
- non-successor acquisitions, 66.7(16)
- original owner, defined, 66(15)
- predecessor owner, defined, 66(15)
- production from, defined, 66(15)
- refund or rebate of Crown royalties, 12(1)(x.2)
- reserve amount, defined, 66(15)
- rules for trusts, 104(5.2)
- successor rules, 66.7(14)

Canadian security

- defined, 39(6)
- disposition of, 39(5)
- election re, 39(4)
- owned by partnership, 39(4.1)

Canadian Security Intelligence Service

- provision of charity information to, for security purposes, 241(9), (9.1)

Canadian service provider

- defined, re non-resident investment or pension fund, 115.2(1)

Canadian tax

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

Canadian tax results

- defined, for functional currency rules, 261(1)

Canadian Venture Exchange

- prescribed securities exchange investment, Reg. 9002.2(e)
- prescribed stock exchange, 262

Canadian Vessel Construction Assistance Act

- conversion cost deemed separate class, 13(17)
- deduction under, deemed depreciation, 13(13)
- disposition of deposit under, 13(19), (20)

Canadian waters

- defined, *Interpretation Act* 35(1)

Canadian Wheat Board

- defined, 135.2(1)
- Farmers' Trust, 135.2(1)“eligible trust”
- unit of, ineligible for TFSA, 135.2(4)(g)
- paid-up capital on issuing shares to trust, 135.2(3)(c)
- tax consequences of privatization, 135.2

Canadian Wheat Board Act, 76(5)**Canadian Wheat Board continuance**

- defined, 135.2(1)

Canals

- capital cost allowance, Reg. Sch. II:Cl. 1(b)

Cancellation of interest, penalty or tax, *see* Waiver**Cancellation of lease**, *see* Lease cancellation payment**Canoes**

- capital cost allowance, Reg. Sch. II:Cl. 7

Canterra Energy Ltd. case overruled, 257**Capacity test**

- for shareholder loans, 15(2.4)(e)

Cape Breton

- defined, 127(9)
- Development Corporation, subject to tax, 27(2), Reg. 7100

Capital

- contribution of, addition to adjusted cost base, 53(1)(c)
- cost, *see* Capital cost; Capital cost allowance
- cost of, defined, Reg. 5202, 5203, 5204
- deemed contribution of, 53(1.1)
- defined
 - for financial institutions tax, 190.13
 - for large corporations tax, 181.2(3), 181.3(3)
- element, *see* Capital element
- expenditure, not deductible, 18(1)(b)
 - depreciation, *see* Capital cost allowance
- disability-related building modifications, deductible, 20(1)(qq)
- disability-related devices or equipment, 20(1)(rr)
- goodwill, deduction for, 20(1)(b)
- landscaping, deduction for, 20(1)(aa)
- pre-production mining expenditure, whether excluded, 66.1(6.2)
- scientific research and experimental development, deductible, 37
 - site investigation fees, deductible, 20(1)(dd)
- financial institutions', tax on, 190–190.211
- gains, *see* Capital gain
- income and, combined, 16(1), (4), (5)
- losses, *see* Capital loss
- outlay or loss, not deductible, 18(1)(b)
- property, *see* Capital property
- reorganization of, exchange of shares, 86(1); ITAR 26(27)
- stock, *see* Capital stock
- tax, *see* Capital tax
- thin, 18(4)–(8)

Capital cost

- allowance, *see* Capital cost allowance
- deemed, 13(7)–(7.4)
 - depreciable property acquired with government assistance, 13(7.1), (7.2)
 - on death, 70(13)
 - reduction due to debt forgiveness, 13(7.1)(g), 80(5)
- leased property acquired, 13(5.1)
- manufacturing and processing property
 - deemed, 13(10)
- tax shelter investment, 143.2(6)
- undepreciated, *see* Undepreciated capital cost

Capital cost allowance, *see also* Depreciable property

- accelerated investment incentive property (2018–2027), *see* Accelerated investment incentive property
- access road (forest), Reg. Sch. II:Cl. 10(p)
- acquisition year rules, Reg. 1100(2)–(2.4)
 - non-arm's length exception, Reg. 1102(20)
- additional allowances
 - Canadian vessel, Reg. 1100(1)(v)
 - certified productions, Reg. 1100(1)(l)
 - Class 13, Reg. 1100(1)(b)
 - Class 14, Reg. 1100(1)(c)
 - Class 19, Reg. 1100(1)(n), (o)
 - Class 20, Reg. 1100(1)(p)
 - Class 21, Reg. 1100(1)(q)
 - Class 28, Reg. 1100(1)(w)
 - Class 35, Reg. 1100(1)(za.1)
 - Class 38, Reg. 1100(1)(zd)
 - Class 39, Reg. 1100(1)(ze)
 - Class 40, Reg. 1100(1)(zf)
 - Class 41, Reg. 1100(1)(y)
 - Class 43 (after 2025), Reg. 1100(2)A(d)
 - Class 43.1, Reg. 1100(2)A(b)
 - Class 43.2, Reg. 1100(2)A(c)
 - Class 53, Reg. 1100(2)A(d)
 - Class 54, Reg. 1100(2)A(e)
 - Class 55, Reg. 1100(2)A(f)
 - Class 56, Reg. 1100(2)A(e)
- electric cars, Reg. 1100(2)A(e), (f)
- fishing vessels, Reg. 1100(1)(i)
- grain storage facilities, Reg. 1100(1)(sb)
- railway cars, Reg. 1100(1)(z), (z.1a)
- railway track, Reg. 1100(1)(za), (za.1), (zb)
- railway trestles, Reg. 1100(1)(za.2)
- zero-emission vehicles, Reg. 1100(2)A(e), (f)
- additions and alterations, *see also* building (*below*)
- advertising sign, Reg. Sch. II:Cl. 11
- aircraft, Reg. Sch. II:Cl. 9, Sch. II:Cl. 16
 - employee's, 8(1)(j), 13(11), Reg. 1100(6)
- airplane hangar, Reg. Sch. II:Cl. 6
- airplane runway, Reg. Sch. II:Cl. 1(g), Sch. II:Cl. 17(c)
 - for mine, Reg. Sch. II:Cl. 10(1)(ii)
- amount deductible, 20(1)(a), Reg. Parts Part XI, XVII
- amusement parks, property used in connection with, Reg. 1103(2b), 1104(12), Reg. Sch. II:Cl. 37
 - defined, Reg. 1104(12)
- apparel for rental, Reg. Sch. II:Cl. 12(k)
- automobile, Reg. 1102(1)(h)
 - definitions, Reg. 1102(11)
 - employee's, 8(1)(j)(ii), 13(11), Reg. 1100(6)
 - exclusion, Reg. 1102(1)(h)
 - general, Reg. 1102(11)–(13), Reg. Sch. II:Cl. 10(a)
 - short-term rental or leasing, for, Reg. Sch. II:Cl. 16
- automotive equipment, Reg. Sch. II:Cl. 10(a)
- available-for-use rule, 13(26)–(32), 20(28), (29), Reg. 1100(2)
- beneficiary of trust, deduction for, 104(16), (17.1), (17.2) [repealed]
- biogas production equipment, Reg. Sch. II:Cl. 43.1(d)(xiii), Sch. II:Cl. 43.2(b)
- bio-oil equipment, Reg. Sch. II:Cl. 43.1(d)(xi), Sch. II:Cl. 43.2(b)
- book (library), Reg. Sch. II:Cl. 12(a)
- breakwater, Reg. Sch. II:Cl. 3, Sch. II:Cl. 6
- bridge, Reg. Sch. II:Cl. 1(a)
- building, Reg. Sch. II:Cl. 1(q), Sch. II:Cl. 3, Sch. II:Cl. 6(a), Sch. II:Cl. 8
 - addition/alteration, Reg. 1102(19), Reg. Sch. II:Cl. 3(g), Sch. II:Cl. 3(k), Sch. II:Cl. 6(i), Sch. II:Cl. 6(k)
- additional allowance for use in manufacturing or processing, Reg. 1100(1)(a.1)

Index

- Capital cost allowance (*cont'd*)
- • additional allowance for non-residential use, Reg. 1100(1)(a.2)
 - • separate class where cost over \$50,000, Reg. 1101(1ac), (1ad), (5b)
 - cable system interface equipment, Reg. Sch. II:Cl. 10(v)
 - Canadian film or video production, Reg. 1100(1)(m), Reg. Sch. II:Cl. 10(x)
 - • separate class, Reg. 1101(5k.1)
 - canal, Reg. Sch. II:Cl. 1(b)
 - canoe, Reg. Sch. II:Cl. 7
 - carbon dioxide pipeline, Reg. Sch. II:Cl. 49(b)
 - catalyst, Reg. Sch. II:Cl. 26
 - catch-all class, Reg. Sch. II:Cl. 8
 - certified Class 34 properties, Reg. 1104(11)
 - certified films and video tapes, Reg. 1100(21)–(23)
 - certified production, Reg. Sch. II:Cl. 10(w), Sch. II:Cl. 12(n)
 - • separate classes, Reg. 1101(5k), (5l)
 - chinaware, Reg. Sch. II:Cl. 12(b)
 - Class 38 property
 - • separate class, election, Reg. 1101(5l)
 - classes of depreciable property, Reg. Sch. II
 - • inclusions in, Reg. 1103
 - • prescribed, Reg. 1105
 - • separate, Reg. 1101
 - • transfers between, Reg. 1103
 - coin-operated game, Reg. Sch. II:Cl. 16(f)
 - combustion turbine, Reg. 1101(5t), Reg. Sch. II:Cl. 17(a.1), Sch. II:Cl. 48
 - compression equipment, Reg. Sch. II:Cl. 7(j), (k)
 - computer, *see* Computer: capital cost allowance
 - computer software, Reg. Sch. II:Cl. 12(o)
 - • limitation where tax shelter investment, Reg. 1100(20.1)
 - concession, Reg. Sch. II:Cl. 14
 - contractor's movable equipment, Reg. Sch. II:Cl. 10(h), Sch. II:Cl. 22, Sch. II:Cl. 38
 - culvert, Reg. Sch. II:Cl. 1(c)
 - cutlery, Reg. Sch. II:Cl. 12(b)
 - cutting rights, Reg. 1100(1)(e)
 - cutting/shaping part in machine, Reg. Sch. II:Cl. 12(j)
 - dam, Reg. Sch. II:Cl. 1(d)
 - • for mine, Reg. Sch. II:Cl. 10(l)
 - data cable, Reg. Sch. II:Cl. 42(b)
 - data communication equipment, Reg. Sch. II:Cl. 3
 - data network infrastructure equipment, Reg. Sch. II:Cl. 46
 - deductions allowed, Reg. 1100
 - deemed depreciable property, separate classes, Reg. 1101(5g), Reg. Sch. II:Cl. 36
 - definitions, Reg. 1104
 - dental instruments (small), Reg. Sch. II:Cl. 12(e)
 - die, etc., Reg. Sch. II:Cl. 12(d)
 - distribution equipment, Reg. Sch. II:Cl. 47
 - district energy equipment, Reg. Sch. II:Cl. 43.1(a)(iii.1), Sch. II:Cl. 43.1(d)(xv)
 - dock, Reg. Sch. II:Cl. 3
 - • for mine, Reg. Sch. II:Cl. 10(l)
 - drilling vessels, Reg. 1100(1)(va)
 - drive-in theatre property, Reg. Sch. II:Cl. 10(q)
 - earth-moving equipment, Reg. Sch. II:Cl. 22, Sch. II:Cl. 38
 - • separate class, election, Reg. 1101(5l)
 - electric cars, Reg. 1100(1)(a)(xl), (xli), Reg. 1100(2)(A)(e), (f)
 - electric vehicle charging station, Reg. Sch. II:Cl. 43.1(d)(xvii)
 - electrical energy storage property, Reg. Sch. II:Cl. 43.1(d)(xviii)
 - electrical generating equipment, Reg. 1100(1)(t), (ta), Reg. Sch. II:Cl. 1(k), Sch. II:Cl. 1(m), Sch. II:Cl. 2(a), Sch. II:Cl. 8(g), Sch. II:Cl. 9(e), Sch. II:Cl. 9(f), Sch. II:Cl. 17(a.1), Sch. II:Cl. 29, Sch. II:Cl. 41, Sch. II:Cl. 43.1, Sch. II:Cl. 43.2
 - • electric energy producer/distributor, Reg. Sch. II:Cl. 2(c), Sch. II:Cl. 8(f), Sch. II:Cl. 9(a)
 - • used for mining, Reg. 1102(8)–(9.2), Reg. Sch. II:Cl. 10(r)
 - electronic data-processing equipment, *see* Computer: capital cost allowance
 - eligible capital property after 2016, Reg. Sch. II:Cl. 14.1
 - eligible liquefaction facility
 - • building, Reg. 1100(1)(a.3), Sch. II:Cl. 1(q)
 - • equipment, Reg. 1100(1)(yb), Sch. II:Cl. 47
 - employee's automobile or aircraft, 8(1)(j)(ii), 13(11), Reg. 1100(6)
 - fast writeoff, *see also* additional allowances (above)
 - • year of acquisition, Reg. 1100(2)
 - fence, Reg. Sch. II:Cl. 6
 - • in amusement park, Reg. Sch. II:Cl. 37
 - fibre-optic cable, Reg. Sch. II:Cl. 42(a)
 - 50% rule, Reg. 1100(2)–(2.4)
 - • non-arm's length exception, Reg. 1102(20)
 - film production, *see* Canadian film or video production
 - films and video tapes, Reg. 1100(21)–(23), 1104(2), (10)
 - first-year rule, Reg. 1100(2)–(2.4)
 - fishing vessels, Reg. 1100(1)(i)
 - • separate classes, Reg. 1101(2)
 - fixed location fuel cell systems or equipment, Reg. Sch. II:Cl. 43.1(a)(ii.1), Sch. II:Cl. 43.1(d)(xii), Sch. II:Cl. 43.2(b)
 - franchise, Reg. 1100(1)(c), 1100(9), Reg. Sch. II:Cl. 14
 - fuel upgrading equipment, Reg. Sch. II:Cl. 43.1(d)(ix), Sch. II:Cl. 43.2(b)
 - gas manufacturing/distributing equipment, Reg. Sch. II:Cl. 1(n), Sch. II:Cl. 2(d)
 - general-purpose electronic data processing equipment, Reg. Sch. II:Cl. 10(f), Sch. II:Cl. 45, Sch. II:Cl. 50
 - generating equipment, Reg. 1100(1)(t), (ta), Reg. Sch. II:Cl. 1(k), Sch. II:Cl. 1(m), Sch. II:Cl. 2(a), Sch. II:Cl. 2(c), Sch. II:Cl. 8(f), Sch. II:Cl. 8(g), Sch. II:Cl. 9(a), Sch. II:Cl. 9(e), Sch. II:Cl. 9(f), Sch. II:Cl. 29
 - geothermal energy project, Reg. Sch. II:Cl. 43.1(d)(vii)
 - goodwill after 2016, Reg. Sch. II:Cl. 14.1
 - grain storage facilities, Reg. 1100(1)(sb)
 - greenhouse, Reg. Sch. II:Cl. 6
 - ground source heat pump system, Reg. Sch. II:Cl. 43.1(d)(i), Sch. II:Cl. 43.2(b)
 - half-year rule, Reg. 1100(2)–(2.4)
 - harness, Reg. Sch. II:Cl. 10(c)
 - heat production/distribution equipment, Reg. Sch. II:Cl. 1(p), Sch. II:Cl. 2(f)
 - heat recovery equipment, Reg. Sch. II:Cl. 43.1
 - heavy water, Reg. Sch. II:Cl. 26
 - immediate expensing (2021–2024), Reg. 1100(0.1)–(0.3), 1104(3.1)–(3.6)
 - industrial mineral mines, Reg. 1100(1)(g), Reg. Sch. V
 - jetty, Reg. Sch. II:Cl. 1(e), Sch. II:Cl. 3
 - jig, Reg. Sch. II:Cl. 12(d)
 - kiln, Reg. Sch. II:Cl. 8
 - kitchen utensils, Reg. Sch. II:Cl. 12(c)
 - land excluded, Reg. 1102(2)
 - last, Reg. Sch. II:Cl. 12(d)
 - lease option agreements, separate classes, Reg. 1101(5)
 - leased properties
 - • buildings on, Reg. 1102(5)
 - • improvements to, Reg. 1102(4)
 - leasehold interest, Reg. 1100(1)(b), 1102(4)–(6), Reg. Sch. II:Cl. 13, Reg. Sch. III
 - • acquired before 1949, Reg. 1102(6)
 - • separate classes, Reg. 1101(5h)
 - leasing properties, Reg. 1100(15)–(20)
 - • non-arm's length exception, Reg. 1102(20)
 - • separate classes, 1101(5c)
 - licence, Reg. Sch. II:Cl. 14
 - linen, Reg. Sch. II:Cl. 12(g)
 - liquefied natural gas facility, Reg. Sch. II:Cl. 47(b)
 - LNG facility, *see* eligible liquefaction facility (above)

Index

- Capital cost allowance (*cont'd*)
- locomotive, Reg. Sch. II:Cl. 6, 7(i)
 - logging equipment, Reg. Sch. II:Cl. 10(o)
 - machinery/equipment, Reg. Sch. II:Cl. 8, Sch. II:Cl. 29, Sch. II:Cl. 43
 - manufacturing/processing business, Reg. 1102(15), (16)
 - excluded activities, Reg. 1104(9)
 - property used in, Reg. Sch. II:Cl. 29, Sch. II:Cl. 43, Sch. II:Cl. 53
 - marine railway, Reg. Sch. II:Cl. 7
 - medical instruments, Reg. Sch. II:Cl. 12(e)
 - mine buildings, Reg. Sch. II:Cl. 10(g), Sch. II:Cl. 41
 - mine equipment etc., Reg. Sch. II:Cl. 10(k), Sch. II:Cl. 10(l), Sch. II:Cl. 10(m), Sch. II:Cl. 41
 - mine property, Reg. 1100(1)(w), (x), 1100A, Reg. Sch. II:Cl. 28, Sch. II:Cl. 41
 - mine shaft etc., Reg. Sch. II:Cl. 12(f)
 - mining, definitions, Reg. 1104(5)–(8)
 - misclassified property, 13(6)
 - mold, Reg. Sch. II:Cl. 12(d)
 - mole, Reg. Sch. II:Cl. 1(f), Sch. II:Cl. 3
 - motion picture film, Reg. Sch. II:Cl. 10(s)
 - multiple-unit residential buildings, Reg. Sch. II
 - separate classes, Reg. 1101(5b)
 - natural gas distribution pipeline, Reg. Sch. II:Cl. 51
 - network equipment, Reg. Sch. II:Cl. 46
 - non-residents, Reg. 1102(3)
 - offshore drilling vessels
 - additional allowance, Reg. 1100(1)(va)
 - separate classes, Reg. 1101(2b)
 - oil or gas well equipment, Reg. Sch. II:Cl. 10(j), Sch. II:Cl. 41
 - oil refinery property, Reg. Sch. II:Cl. 10(u), Sch. II:Cl. 41
 - oil storage tank, Reg. Sch. II:Cl. 6, Sch. II:Cl. 29
 - outdoor advertising structures, Reg. Sch. II:Cl. 8(l), Sch. II:Cl. 11
 - separate class, election, Reg. 1101(5l)
 - overburden removal cost, Reg. Sch. II:Cl. 12(q)
 - parking area, Reg. Sch. II:Cl. 1(g)
 - for mine, Reg. Sch. II:Cl. 10(l)
 - partnership property, excluded, Reg. 1102(1a)
 - patent, Reg. 1100(1)(c), 1100(9), Reg. Sch. II:Cl. 14, Sch. II:Cl. 44
 - pattern, Reg. Sch. II:Cl. 12(d)
 - photovoltaic equipment, Reg. Sch. II:Cl. 43.1(d)(vi), Sch. II:Cl. 43.1(d)(xiii), Sch. II:Cl. 43.2(b)
 - pinball machine, Reg. Sch. II:Cl. 16(f)
 - pipeline, Reg. Sch. II:Cl. 1(l), Sch. II:Cl. 2(b), Sch. II:Cl. 49
 - for mine, Reg. Sch. II:Cl. 10(l)
 - separate classes, Reg. 1101(5i), (5j)
 - pollution control equipment, Reg. 1100(1)(t)
 - prescribed classes of depreciable property, Reg. 1105
 - property acquired by transfer, amalgamation or winding-up, Reg. 1102(14), (14.1)
 - non-arm's length exception, Reg. 1102(20)
 - property acquired in the year, Reg. 1100(2)–(2.4)
 - non-arm's length exception, Reg. 1102(20)
 - property not included in classes, Reg. 1102
 - pumping equipment, Reg. Sch. II:Cl. 7(j), Sch. II:Cl. 7(k)
 - radar equipment, Reg. Sch. II:Cl. 9
 - radio communication equipment, Reg. Sch. II:Cl. 8, Sch. II:Cl. 9
 - rail suspension device, Reg. Sch. II:Cl. 7(h)(i), Sch. II:Cl. 35(b)
 - railway cars, Reg. 1100(1)(z), (z.1a), Reg. Sch. II:Cl. 7(h)(ii), Cl. 35
 - separate classes, Reg. 1101(5d)–(5d.2)
 - railway locomotive, Reg. Sch. II:Cl. 6(j), Sch. II:Cl. 7(i), Sch. II:Cl. 10(y)
 - railway property, Reg. 1100(1)(zc)
 - railway sidings, Reg. 1100(8)
 - railway system, Reg. Sch. II:Cl. 4
 - railway tank car, Reg. Sch. II:Cl. 6
 - railway track, Reg. 1100(1)(za.1), (zb), Reg. Sch. II:Cl. 1(h)
 - for mine, Reg. Sch. II:Cl. 10(m), Sch. II:Cl. 41
 - separate classes, Reg. 1101(5e), (5e.1)
 - railway traffic control equipment, Reg. Sch. II:Cl. 1(i)
 - rapid transit car, Reg. Sch. II:Cl. 8
 - rates for various classes of property, Reg. 1100(1)
 - recapture, 13(1); ITAR 20(2)
 - passenger vehicle, 13(2)
 - R&D expenditures previously deducted, 37(6)
 - rollover where property replaced, 13(4), (4.1)
 - vessels, 13(13), (15), (16)
 - reclassification of property, 13(5)
 - recreational property, Reg. 1102(17)
 - regulations, Reg. Part XI
 - rental properties, Reg. 1100(11)–(14.2)
 - non-arm's length exception, Reg. 1102(20)
 - separate class for each, Reg. 1101(1ac)–(1ae)
 - revocation of certificates (Class 34 properties), Reg. 1104(11)
 - river improvements, Reg. 1102(7)
 - roadway, Reg. Sch. II:Cl. 1(g), Sch. II:Cl. 17
 - for mine, Reg. Sch. II:Cl. 10(l)
 - roller skating rink floor, Reg. Sch. II:Cl. 10(i)
 - rowboat, Reg. Sch. II:Cl. 7
 - rules re property, Reg. 1102
 - runway, *see* airplane runway (*above*)
 - scale, metric, for retail use, Reg. Sch. II:Cl. 12(p)
 - scow, Reg. Sch. II:Cl. 7
 - separate classes, *see* Separate classes for capital cost allowance
 - shares, no CCA allowed, 18(1)(y)
 - sidewalk, Reg. Sch. II:Cl. 1(g)
 - sleigh, Reg. Sch. II:Cl. 10(d)
 - software, *see* computer software (*above*)
 - solar heating equipment, Reg. Sch. II:Cl. 43.1(d)(i), Sch. II:Cl. 43.2(b)
 - stable equipment, Reg. Sch. II:Cl. 10(c)
 - storage area, Reg. Sch. II:Cl. 1(g)
 - for mine, Reg. Sch. II:Cl. 10(l)
 - subway, Reg. Sch. II:Cl. 1(j)
 - systems software, Reg. 1104(2), Reg. Sch. II:Cl. 10(f), Sch. II:Cl. 29
 - tableware, Reg. Sch. II:Cl. 12(b)
 - tangible capital property not elsewhere specified, Reg. Sch. II:Cl. 8(i)
 - tank (oil or water), Reg. Sch. II:Cl. 8
 - taxation year less than 12 months, Reg. 1100(3)
 - taxicab, Reg. Sch. II:Cl. 16
 - telecommunication spacecraft, Reg. Sch. II:Cl. 10(f.2), Sch. II:Cl. 30(a)
 - separate classes, Reg. 1101(5a)
 - telephone cable, Reg. Sch. II:Cl. 42(b)
 - telephone/telegraph equipment, Reg. Sch. II:Cl. 3, Sch. II:Cl. 17
 - telephone/telegraph system, Reg. Sch. II:Cl. 17
 - television commercial, Reg. Sch. II:Cl. 12(m)
 - terminal loss, 20(16)
 - limitation re franchise or licence exchanged, 20(16.1)(b)
 - limitation re passenger vehicles, 20(16.1)(a)
 - tidal energy, electricity generation equipment, Reg. Sch. II:Cl. 43.1(d)(xiv), Sch. II:Cl. 43.2
 - timber cutting/clearing equipment etc., Reg. Sch. II:Cl. 10(n), Sch. II:Cl. 15
 - timber limits and cutting rights, Reg. 1100(1)(e)
 - separate classes, Reg. 1101(3)
 - timber resource property, Reg. Sch. II:Cl. 33
 - tools
 - portable, for rental, Reg. Sch. II:Cl. 10(b), Sch. II:Cl. 29
 - small, Reg. Sch. II:Cl. 12(h)

Index

- Capital cost allowance (*cont'd*)
 - “total depreciation” defined, 13(21)
 - townsite costs for mine, Reg. 1102(18) [repealed], Reg. Sch. II:Cl. 10(l)
 - trailer, Reg. Sch. II:Cl. 10(e)
 - tramways, Reg. Sch. II:Cl. 4
 - transferred property, 13(5)
 - transmission equipment, Reg. Sch. II:Cl. 47
 - trestles, Reg. 1100(1)(za.2), (zb), Reg. Sch. II:Cl. 3
 - separate classes, Reg. 1101(5e.2), (5f)
 - tunnel, Reg. Sch. II:Cl. 1(j)
 - undepreciated capital cost, defined, 13(21)
 - underground storage cost, Reg. Sch. II:Cl. 10(f.1), Sch. II:Cl. 41
 - uniforms, Reg. Sch. II:Cl. 12(k)
 - vat, Reg. Sch. II:Cl. 8
 - vehicle charging station, Reg. Sch. II:Cl. 43.1(d)(xvii)
 - vessels, Reg. 1101(2)–(2b), Reg. Sch. II:Cl. 7
 - certified, Reg. 1100(1)(v), 1101(2a)
 - separate classes, Reg. 1101(2)–(2b)
 - video game, Reg. Sch. II:Cl. 16(f)
 - videotape, Reg. Sch. II:Cl. 10(s), Sch. II:Cl. 12(l), Sch. II:Cl. 12(m)
 - videotape cassette for rental, Reg. Sch. II:Cl. 12(r)
 - wagon, Reg. Sch. II:Cl. 10(d)
 - waste-fuelled thermal energy system, Reg. Sch. II:Cl. 43.1(d)(ix), Sch. II:Cl. 43.2(b)
 - water distributing equipment, Reg. Sch. II:Cl. 1(o), Sch. II:Cl. 10(e)
 - water storage tank, Reg. Sch. II:Cl. 6, Sch. II:Cl. 29
 - wave energy, electricity generation equipment, Reg. Sch. II:Cl. 43.1(d)(xiv), Sch. II:Cl. 43.2
 - wharf, Reg. Sch. II:Cl. 3, Sch. II:Cl. 6
 - for mine, Reg. Sch. II:Cl. 10(l)
 - windmill, Reg. Sch. II:Cl. 3
 - woods assets, Reg. Sch. IV
 - zero-emission vehicles, Reg. 1100(1)(a)(xl), (xli), Reg. 1100(2)A(e), (f)
- Capital deduction**
 - for financial institutions tax
 - deducted in computing amount subject to tax, 190.1(1)
 - defined, 190.15
 - for large corporations tax, defined, 181.5
- Capital dividend, 83(2)**
 - account, *see* Capital dividend account
 - amalgamation, on, 87(2)(x)(ii)
 - election to treat dividend as, 83(2), (2.2)–(2.4)
 - form and manner of making, Reg. 2101
 - where not available, 83(2.1)
 - paid to non-resident, 212(2)(b)
 - through trust, 212(1)(c)(ii)
 - private corporation, Reg. 2101
- Capital dividend account**
 - amalgamation, on, 87(2)(z.1)
 - corporation ceasing to be exempt, 89(1.2)
 - defined, 89(1)
 - “designated property” defined, 89(1)
 - dividend payable before May 7, 1974, ITAR 32.1(4)
 - gift by corporation, 89(1)“capital dividend account”(a)(i)(A)
 - life insurance proceeds
 - after May 23, 1985, 89(1)“capital dividend account”(d)
 - before May 24, 1985, 89(1)“capital dividend account”(e)
 - exclusion from anti-avoidance rule, 83(2.3)
 - payment out of, *see* Capital dividend
 - prescribed labour-sponsored venture capital corporation, of, deemed nil, 131(11)(e)
 - where control acquired, 89(1.1)
- Capital element**
 - annuity, of, deductible, 60(a)
 - blended payment, 16(1), (4), (5); 20(1)(k) [repealed]
- Capital gain, *see also* Capital gains and losses**
 - allocation of
 - credit union, by, 137(5.1), (5.2)
 - convertible property, 51
 - deduction, *see* Capital gains deduction
 - deemed
 - capital gains stripping, 55(2)–(5)
 - debt forgiveness, 80(12)
 - negative adjusted cost base, 40(3)
 - of passive partnership interest, 40(3.1)
 - defined, 39(1)(a), 40(1)(a)
 - dividend instead of, on disposition of share of foreign affiliate, 93(1)
 - donation of publicly traded shares, 38(a.1)
 - partnership interests exchangeable for, 38(a.3)
 - exchanges of property, 44
 - failure to report, 110.6(6)
 - foreign affiliate, of
 - election re, Reg. 5902
 - income, 3
 - income-splitting tax, 120.4(4), (5)
 - life insurer’s pre-1969 property, 138(11.2)
 - listed personal property
 - taxable net gain, 41
 - non-resident, 115(1)(b)
 - prorating for gains before May 1995, 40(9)
 - not included in income from property, 9(3)
 - principal residence
 - exemption, 40(2)(b)
 - farmer’s, 40(2)(c)
 - recovery of bad debt, 39(11)
 - reserve, *see* Reserve: capital gain
 - rollover, *see* Rollover
 - shares or exchangeable partnership interests, donation of, 38(a.1), (a.3)
 - specified, deductions for, 126(5.1)
 - split income, 120.4(4), (5)
 - stripping, 55(2)–(5)
 - taxable
 - beneficiary’s, designated by trust, 104(21.2)
 - defined, 38(a), 248(1)
 - definitions, 54
 - excluded from income of certain exempt organizations, 149(2)
 - foreign affiliate, of, 95(2)(f)
 - insurer’s, 138(2)(b), 142
 - net, of trust, 104(21.3)
 - partnership, of, 96(1.7)
 - trust’s, designation to beneficiary, 104(21)
 - taxed
 - defined, 130(3)
 - treaty rules, Canada-U.S. Tax Treaty:Art. XIII
- Capital gains and losses, *see also* Capital gain; Capital loss**
 - adjusted cost base of property owned on Dec. 31/71, ITAR 26(3), (4)
 - application of subdivision c, ITAR 26(1)
 - becoming resident, on, 128.1(1)(b)
 - ceasing to be resident, on, 128.1(4)(b)
 - deemed, from property transferred to spouse, 74.2(2)
 - deemed acquisition or disposal of property, 45
 - disposition after June 18/71 where not at arm’s length, ITAR 26(5)
 - disposition before 1972, ITAR 26(5)
 - disposition subject to warranty, 42
 - disposition to corporation controlling or controlled by taxpayer, 40(2)(a)(ii)
 - dividend in kind, cost of, 52(2)
 - election re cost of property owned on Dec. 31/71, ITAR 26(7)

Index

Capital gains and losses (*cont'd*)

- employees profit sharing plan, allocated under, 144(4)–(4.2)
- exempt person, of, 40(2)(a)(i)
- fair market value of securities, ITAR 26(11)
- foreign affiliate, of, 95(2)(f)
- foreign exchange, 39(1.1), (2)
- identical properties, 47
- “listed-personal-property loss” defined, 41(3)
- lottery prize, 40(2)(f)
- meaning of, 39(1)
- negative adjusted cost base deemed gain, 40(3), (3.1)
- non-resident taxpayer, 40(2)(a)(i)
- options, *see* Option
- partial dispositions, 43
- personal-use property, 46
 - corporation, 46(4)
- prizes, 52(4)
- property whose value included in income, cost of, 52(1)
- purchase of bond etc. by issuer, 39(3)
- reacquired property, ITAR 26(6)
- rollover, *see* Rollover
- stock dividends, 52(3)
- Valuation Day, ITAR 24, 25

Capital gains deduction, 110.6

- allowable business investment loss, interaction, with, 39(9), 110.6(1)“annual gains limit”B(b), 110.6(1)“cumulative gains limit”(b)
- anti-avoidance rules, 110.6(7)–(11)
- beneficiary of trust, 104(21.2)
- definitions, 110.6(1)
- determination of income while not resident, 110.6(13)
- double-dipping restriction, *see* Cumulative net investment loss
- election to trigger gain before corporation goes public, 48.1
- election to trigger gain on Feb. 22/94, 110.6(19)–(30); ITAR 26(29)
 - depreciable capital property
 - cost, 13(7)(e.1)
 - no recapture, 13(21)“undepreciated capital cost”F
 - excessive, 14(9) [before 2017], 110.6(19)(a)(ii)(C)(II), 110.6(22)(a)B, 110.6(28)
 - non-qualifying real property, 110.6(21)
 - option, 40(3.2)
 - partnership interest, 110.6(23)
 - penalty for late election, 110.6(29)
 - principal residence, 40(2)(b)A, D, 40(7.1)
 - shares from employee stock option, 110.6(19)(a)(i)(A)B
- failure to report gains, 110.6(6)
- indexing to inflation, 117.1(1)
- individual deemed resident in Canada, 110.6(5)
- interest expense, effect of, *see* Cumulative net investment loss
- maximum, 110.6(4)
- non-qualifying real property, defined, 110.6(1)
- other property, 110.6(3)
- partnership look-through rule, 110.6(14)(d.1)
- prescribed shares, Reg. 6205
- qualified farm or fishing property, 110.6(2)
- qualified small business corporation shares, 110.6(2.1)
- specified capital gains, 126(5.1)
- spousal trust, of, 110.6(12)
- where amount deemed proceeds of disposition rather than dividend, 183.1(7)
- where not permitted, 110.6(7), (8), (11)

Capital gains dividend

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

Capital gains dividend account

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

Capital gains exemption, *see* Capital gains deduction

Capital gains pool [repealed]

- of registered charity
 - defined, 149.1(1)

Capital gains redemptions

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

Capital gains refund

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

Capital gains stripping

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

Capital interest (in a trust), *see* Trust (or estate): capital interest in

Capital loss, *see also* Capital gains and losses; Net capital loss

- allowable
 - defined, 38(b)
 - foreign affiliate, of, 95(2)(f)
 - partnership, of, 96(1.7)
 - bad debt, 50(1)
 - personal-use property, 50(2)
- deduction for, 3
- defined, 39(1)(b)
- disposition of bond, etc., by corporation, 40(2)(d)
- disposition of debt, limitations on, 40(2)(e.1), (e.2), 40(2)(g)(ii)
- disposition of property to affiliated person, 40(3.3), (3.4)
- disposition of property to person controlling or controlled by corporate taxpayer, 40(3.3), (3.4)
- foreign affiliate, of, *see* Foreign accrual capital loss
- labour-sponsored venture capital corporation, disposition of shares of, 40(2)(i)
- net, *see* Net capital loss
- not included in loss from property, 9(3)
- personal-use property, 40(2)(g)(iii)
- pre-1986 balance, defined, 111(8)
- reassessment, 152(6)(a)
- restricted, 40(2), *see also* Stop-loss rules
- scientific research tax credit, unused, 39(8)
- shares of bankrupt corporation, 50(1)
- shares of controlled corporation, disposition of, 40(2)(h)
- shares of foreign affiliate, disposition of, 93(2)–(2.3), (4)
- stock savings plan, disposition of shares of, 40(2)(i)
- stop-loss rules, *see* Stop-loss rules
- superficial, 40(2)(g)(i), 54“superficial loss”
- unused share-purchase tax credit, 39(7)
- venture capital corporation, disposition of shares of, 40(2)(i)
- warranty, outlay or expense under, 42

Capital property, *see also* Disposition; Property

- adjusted cost base of, *see* Adjusted cost base
- amalgamation, on, 53(6), 87(2)(e)
- certain shares deemed to be, 54.2
- deceased taxpayer’s, 70(5)
- fair market value, 70(5.3)
- defined, 54, 248(1); ITAR 26(12)“capital property”
- depreciable, *see* Depreciable property

Index

- Capital property (*cont'd*)
 - donation of, election for reduced proceeds of disposition
 - corporation, 110.1(2.1), (3)
 - individual, 118.1(5.4), (6)
 - eligible, *see* Eligible capital property
 - “eligible property” for transfer to corporation by shareholder, 85(1.1)(a)
 - non-depreciable
 - change of control of corporation, 111(4)(c)–(e)
 - share
 - loss on, 112(3)
 - transfer of, to corporation, ITAR 26(5.2)
- Capital setoff adjustment**, *see* Transfer pricing capital setoff adjustment
- Capital stock**
 - “class” interpretation, 248(6)
 - tax-deferred preferred series, Reg. 2107
- Capital surplus**, *see* Pre-1972 capital surplus on hand
- Capital tax**
 - defined, re insurance reserves, Reg. 1408(1)
 - financial institutions tax, Part VI (190–190.24)
 - Large Corporations Tax, Part I.3 (181–181.8)
 - provincial, deductibility of, 18
 - treaty restrictions, Canada-U.S. Tax Treaty:Art. XXIII
- Capitalization, thin**, 18(4)–(8)
- Capitalization of interest**
 - election, 21
- Captioning services**
 - disability supports deduction, 64(a)A(ii)(A)
 - medical expense credit, 118.2(2)(1.4)
- Captured carbon**
 - defined, 127.44(1), Reg. 1104(2)
- Car**, *see* Automobile; Passenger vehicle
- Carbon capture, utilization and storage**
 - capital cost allowance for expenditures, Reg. Sch. II:Cl. 59, 60
 - investment tax credit, 127.44, *see also* CCUS tax credit
- Carbon credits**, *see* Emissions allowance
- Carbon dioxide transmission pipeline**
 - capital cost allowance, Reg. Sch. II:Cl. 49(b)
- Carbon tax refunds**
 - to farmers, 127.42
 - to individuals generally (Climate Action Incentive), 122.8
 - to small businesses, *see* Proposed Amendment under 127.42
- Career retraining**, *see* Job retraining
- Caregiver**
 - caregiver benefit paid to Canadian Forces member or veteran, exempt, 81(1)(d.1)(vii)(F)
 - tax credit, 118(1)B(d)
- Caribbean Development Bank**
 - bonds of, qualified investment for RRSP etc., 204“qualified investment”(c.1) (formerly Reg. 4900(1)(l)(iv))
- Carpenter**
 - apprenticeship job creation credit, 127(9)“investment tax credit”
- Carrier**
 - defined, 146.3(1)“carrier”
 - for RRIF, Reg. 215(1)
- Carryback**, *see also* Carryforward
 - charitable donations, from year of death, 118.1(4)
 - disbursement excess of charity, 149.1(20)
 - effect on interest payable, 161(7), 164(5), (5.1)
 - foreign accrual capital loss, Reg. 5903.1(1)(b)
 - interest deduction restrictions, 18.2(1)“cumulative unused excess capacity”(b), 18.2(4)
 - investment tax credit, unused, 127(5)(a), 127(9)“investment tax credit”(c)
 - losses, 111(1)
 - after amalgamation, 87(2.11)
 - after emigration, against gains deemed on emigration, 128.1(8)
 - amendment to earlier return, 152(6)(c)
 - employee life and health trust, 111(7.3)
 - foreign accrual property, 152(6.1), Reg. 5903(1)(b)
 - from estate, to taxpayer’s year of death, 164(6)
 - mutual fund investment of non-resident, 218.3(6)
 - RRIF, in, after death, 146.3(6.3), (6.4)
 - RRSP, in, after death, 146(8.92), (8.93)
 - RRIF losses after death, 146.3(6.3), (6.4)
 - RRSP losses after death, 146(8.92), (8.93)
- Carryforward**
 - business losses, 111(1)(a)
 - Canadian life investment losses (Part XII.3 tax), 211.1(2)
 - capital losses (net capital losses)
 - against capital gains, 111(1)(b), 111(1.1)
 - against other income in year of death, 111(2)
 - defined, 111(8)“net capital loss”
 - pre-1986, against other income, 111(1.1)
 - charitable donations
 - corporation, 110(1)
 - credit, 118.1(1)“total charitable gifts”
 - deduction to corporation, 110.1(1)(a)
 - first-time donor credit, 118.1(3.1)
 - individual, 118.1(1)
 - deposit insurance corporation, losses of, 137.1(11)(a)
 - disbursement excess of charity, 149.1(20)
 - ecological donations, 110.1(1)(d)(iii), 118.1(1)“total ecological gifts”(c)
 - education credit, 118.61
 - emigration deemed gains, 128.1(8)
 - employee life and health trust losses, 111(7.3)
 - expense, against reimbursement or assistance, 12(2.2)
 - FAPI, foreign taxes against, 91(4)
 - farm land disposed of by partnership, loss on, 101
 - farm losses, 111(1)(d)
 - restricted, 111(1)(c)
 - foreign accrual capital loss, 5903.1(1)(a)
 - foreign accrual property loss, Reg. 5903(1)(a)
 - foreign affiliate’s forgiven debt, 95(1)“foreign accrual property income”A.2, G
 - foreign bank’s Canadian affiliate’s losses, 142.7(12)
 - foreign tax credits, unused, 126(2)(a), 126(2.3), 126(7)“unused foreign tax credit”
 - gifts to charity
 - credit, 118.1(1)“total charitable gifts”
 - deduction to corporation, 110.1(1)(a)
 - home office expenses, undeducted, 8(13)(c), 18(12)(c)
 - interest deduction restrictions, 111(1)(a.1), 111(8)“restricted interest and financing expense”
 - interest paid on purchase of shares, 20(1)(q)(ii)
 - interest paid on student loan, 118.62:B
 - investment tax credit, 127(9)“investment tax credit”(c)–(h)
 - legal fees to obtain retiring allowance or pension benefit, 60(o.1)(i)
 - limited partnership losses, 111(1)(e)
 - listed personal property losses, 41(2)(b)
 - loss restrictions on change in control, *see* Control of corporation: change of
 - minimum tax, 120.2(1)
 - moving expenses, 62(1)(b), (c)
 - mutual fund losses of non-resident, 218.3(3)
 - net capital losses, *see* Capital loss
 - non-capital losses, 111(1)(a), 111(8)“non-capital loss”
 - non-deductible home office expenses, 8(13)(c), 18(12)(c)
 - patronage dividends, 135(2.1)
 - pre-1986 capital losses, 111(1.1)

Index

- Carryforward (*cont'd*)
- RRSP contributions not yet deducted, 146(5)(a)
 - RRSP deduction room, 146(1)“RRSP deduction limit”, “unused RRSP deduction room”
 - reduction of balances on debt forgiveness, 80(3), (4)
 - refundable dividend tax on hand, 129(4)“eligible refundable dividend tax on hand”(b), 129(4)“non-eligible refundable dividend tax on hand”(c)
 - repayment of support payments, 60(c.2)
 - research and development expenses, 37(1)
 - partnership, disallowed, 96(1)(e.1)
 - restricted farm losses, 111(1)(c)
 - scientific research expenses, 37(1)
 - student loan interest credit, 118.62:B
 - surtax credit, unused
 - against Part VI tax, 190.1(3)(b)
 - tuition credit, 118.61
- Carrying charges**
- interest accrued on bond, 20(14)
 - interest paid, *see* Interest (monetary): deductible
 - safety deposit box rental, 9(1)
- Carrying on business in Canada**
- extended meaning of, 253
 - non-Canadian corporations
 - additional tax, 219
 - non-resident, 115(1)(a)
 - liability for tax on, 2(3)(b)
 - part-year resident, 114
- Carrying value (of property)**
- defined
 - for notifiable-transaction rules, 237.4(15)
 - for reportable-transaction rules, 237.3(8.2)
 - for small business investment capital gain rollover, 44.1(1)
 - for taxation of insurers, Reg. 2400(2)
 - for uncertain-tax-treatment rules, 237.5(9)
- Carryover of losses, *see* Carryback; Carryforward**
- Carve-out arrangements**
- resource properties acquired from tax-exempt person, 66.6
- Carved-out income**
- deduction under Part I, 66(14.6)
 - defined, 209(1)
 - partnership deemed person, 209(6)
 - tax on, 209(2)
 - payment, 209(4)
 - return, 209(3)
- Carved-out property**
- defined, 209(1)
 - definitions, 209(1)
 - exclusions from, Reg. 7600
 - prescribed property, Reg. 7600
- Cash**
- defined, for international electronic funds transfer reporting, 244.1
- Cash flow adjustment**
- insurance corporation, Reg. 2412
- Cash method of computing income**
- becoming non-resident, on, 28(4), (4.1)
 - COVID-19 Canada Emergency Wage Subsidy qualification, 125.7(4)(e)
 - changing from, 28(3)
 - defined, 28(1), 248(1)
 - farming or fishing business, 28(1)–(3)
 - non-resident ceasing to carry on business in Canada, 28(4), (4.1)
- Cash-out of employee stock option, 7(1)(b.1), (d.1)**
- Cash purchase ticket**
- grain, for
 - when amount included in income, 76(4)
- Cash register, electronic, *see* Electronic cash register**
- Cash surrender value**
- of insurance policy, defined, 148(9), Reg. 310, 1408(1)
- Cash value**
- defined, for Common Reporting Standard, 270(1)
- Cash value insurance contract**
- defined, for Common Reporting Standard, 270(1)
- Casino**
- defined, for international electronic funds transfer reporting, 244.1
- Casinos relief (COVID), Reg. 8901.1(2)(b)(xviii), *see also* Qualifying tourism or hospitality entity**
- Catalyst**
- capital cost allowance for, Reg. Sch. II:Cl. 26
- Catch**
- defined, Reg. 105.1(1)
- Catheters and related products**
- medical expense credit, 118.2(2)(i.1)
- Cattle**
- basic herd maintained since 1971, deduction, 29
 - breeding, 80.3(1)“breeding animals”
 - dairy farming, 248(1)“farming”
 - exhibiting and raising, 248(1)“farming”
 - inventory, valuation of, 28(1.2)
- Ceasing to act as agent of beneficiary**
- constitutes disposition, 248(1)“disposition”(b)(v)
- Ceasing to be a financial institution, 142.6(1)(a), (c)**
- Ceasing to be qualifying environmental trust, 107.3(3)**
- Ceasing to be resident in Canada, *see also* Former resident**
- attribution rule, application to deemed disposition, 74.2(3)
 - corporation, *see* Continuance outside Canada
 - deemed disposition of property, 128.1(4)(b)
 - election for, 128.1(4)(d)
 - instalment obligation not increased, 128.1(5)
 - returning former resident, 128.1(6), (7)
 - stock option income excluded, 7(1.6)
 - demand for payment of taxes owing, 226(1)
 - departure tax, 128.1(4)
 - additional tax on corporations, 219.1(1), 219.3
 - security for, 220(4.5)–(4.54)
 - employee life and health trust, 128.1(4)(b.1)
 - farmer or fisherman, 28(4), (4.1)
 - fiscal period end, 128.1(4)(a.1)
 - foreign tax credit after emigration, 126(2.21)
 - trust beneficiary, 126(2.22)
 - Home Buyers’ Plan income inclusion, 146.01(5)
 - information return, 128.1(9)
 - Lifelong Learning Plan income inclusion, 146.02(5)
 - loss after emigration, 128.1(8)
 - moving to United Kingdom, Canada–U.K. Tax Convention Art. 13:9
 - moving to the United States, Canada–U.S. Tax Treaty:Art. XIII:6
 - payment of tax
 - election to defer, 220(4.5)–(4.54), Reg. 1301
 - post-emigration loss, 128.1(8)
 - reporting of assets, 128.1(9)
 - rollovers of shares after emigration ignored, 128.3
 - security for departure tax, 220(4.5)–(4.54)
 - seizure of goods and chattels for non-payment of tax, 226(2)
 - to pursue research under grant, 115(2)(b.1)
 - trust, deemed, 94(5)–(5.2)
 - trust deemed to dispose of property on transferor’s emigration, 104(4)(a.3)

- Ceasing to carry on business**, *see also* Death of taxpayer; Sale: business, of; Winding-up
- accounts receivable, 28(5)
 - business income of individual, effect on, 34.1(8)(a)
 - disposition of depreciable property after, 13(8), 20(16.3)
 - farming business, 28(4), (5)
 - general rules, 22–25
 - information returns to be filed, Reg. 205(2)
 - non-resident, 10(12), (14)
 - subsequent transactions
 - repayment of assistance, deduction relating to pre-2017 eligible capital expenditure, 20(1)(hh.1)
 - sale of inventory, 23(1)
- Ceasing to use inventory in business**
- non-resident, 10(12), (14)
- Ceasing to use property in Canadian business**
- non-resident financial institution, 142.6(1.1)
- Celiac disease patients, medical expense credit for gluten-free food costs**, 118.2(2)(r)
- Cemetery arrangements**, *see* Eligible funeral arrangement; Funeral services
- Cemetery care trust**
- defined, 148.1(1), 248(1)
 - emigration of individual, no deemed disposition, 128.1(10)“excluded right or interest”(e)(iii)
 - excluded from various trust rules, 108(1)“trust”(e.1)
 - rollover to new trust, 248(1)“disposition”(f)(vi)
- Cemetery services**
- defined, 248(1)
 - provision of under eligible funeral arrangements, 148.1(2)(b)(i)
- Central bank**
- defined, for Common Reporting Standard, 270(1)
- Central paymaster**
- provincial allocation of corporate income, Reg. 402.1
- Certificate**
- accredited film or video production, 125.5(1), (6)
 - amount payable, re, 223(2)
 - application of, 223(1)
 - charge on land, 223(5), (6)
 - costs, 223(4)
 - registration in Court, 223(3)
 - binding under provincial laws, 223(8)
 - proceedings re, 223(7)
 - sale of property, 223(9)
 - sale of property
 - application by Minister for Federal Court order, 223(11)
 - requirements re documentation, 223(10)
 - total amount, “prescribed rate” sufficient details, 223(12)
 - before distribution of estate etc., 159(2)
 - failure to obtain, 159(3)
 - Canadian film or video production, 125.4(1)
 - change of ownership, Reg. 502
 - clearance, 159(2), (3)
 - dispositions of property by non-resident, 116(2), (4), (5.2)
 - ecologically sensitive land, 110.1(1)(d), 118.1(1)“total ecological gifts”
 - employer’s, re employees’ expenses, 8(10)
 - fair market value of ecological gift, 118.1(10.5)
 - oil/gas well, re, 66.1(6)“Canadian exploration expense”(d)(iv)
 - ceasing to be valid, 66.1(10)
 - ownership, 234, Reg. 207
 - participation, Canadian Wheat Board, 161(5)
- Certificate of completion**
- defined, for Canadian film/video credit, Reg. 1106(1)
- Certification deadline**
- defined, Reg. 1106(1)“certificate of completion”
- Certification fee paid to bank**, 20(1)(i) [repealed]
- Certifiable past service event**
- defined, Reg. 8300(1)
- Certified feature film [repealed]**
- defined, Reg. 1104(2)
- Certified production (pre-1996)**
- capital cost allowance, Reg. 1100(21)–(23), Reg. Sch. II:Cl. 10(w), Sch. II:Cl. 12(n)
 - add-back for minimum tax purposes, 127.52(1)(c)
 - additional, Reg. 1100(1)(l)
 - separate class, Reg. 1101(5k), (5l)
 - defined, Reg. 1104(2)
 - information returns, Reg. 225
- Certified property, defined**, 127(9)
- Chamber of commerce**
- exemption, 149(1)(e), 149(2)
 - information return, whether required, 149(12)
- Change in use**
- capital property, 45
 - depreciable property, 13(7)(a), (b)
 - property of insurer, 138(11.3), (11.31)
 - research property, changed to commercial use, 127(27), (29)
- Change of address**
- cost of, deduction, 62(3)(h)
- Change of control**
- corporation, *see* Control of corporation: change of
 - trust, 251.2, *see* Loss restriction event
- Character conversion transaction**, *see* Derivative forward agreement
- Charging provisions**, *see* Liability for tax
- Charging station for electric vehicles**
- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xvii)
- Charitable activities**
- charity must devote all resources to, 149.1(1)“charitable organization”(a)
 - defined, 149.1(1)
- Charitable donations/gifts**, *see* Gifts and donations (charitable)
- Charitable foundation**, *see also* Charity; Private foundation; Public foundation; Registered charity
- charitable purposes of, 149.1(6.1)
 - corporation controlled by, 149.1(12)
 - defined, 149.1(1), Reg. 3700
 - disbursement quota, *see* Disbursement quota (of charity)
 - political activities of, 149.1(6.1)
 - self-dealing rules, 149.1(1)“divestment obligation percentage”, (4)(c)
 - transfer of property
 - tax on, 188(3), (4)
 - value of property, determination of, Reg. 3702
- Charitable organization**, *see also* Charity; Registered charity
- business activities of, 149.1(6)
 - penalty for carrying on unrelated business, 188.1(1)(b), 188.1(2)(b)
 - revocation for carrying on unrelated business, 149.1(2)(a)
 - charitable activities of, 149.1(6.2)
 - defined, 149.1(1)
 - designation of registered charity as, 149.1(6.3)
 - outside Canada that federal government has donated to
 - donation to, 149.1(1)“qualified donee”(a)(v)
 - by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
 - political activities of, 149.1(6.2)
 - registration of, *see* Registered charity
 - resources of, devoted to charitable activity, 149.1(6)
 - deemed, 149.1(10)
 - U.S. resident, Canada-U.S. Tax Treaty:Art. XXI
 - universities outside Canada, Reg. 3503, Reg. Sch. VIII
 - volunteers operating business, 149.1(1)“related business”

Index

Charities Registration (Security Information) Act

- revocation of charity's registration, 168(3)
- • no appeal, 172(3.1)
- taxpayer information provided for enforcement, 241(4)(f.1)
- • use of information by RCMP, CSIS or FINTRAC, 241(9), (9.1)
- text of, 168(3) (Notes)

Charity, *see also* Registered charity

- administration and management expenses not charitable activities, 149.1(1.1)(d)
- associated
 - • designation of, by Minister, 149.1(7)
- charitable purposes, defined, 149.1(1)
- defined, 149.1(1) "charity"
- designated as beneficiary of insurance policy, 118.1(5.2)(a)
- disbursement quota, *see* Disbursement quota (of charity)
- disclosure of information by CRA, 149.1(15), 241(3.2)
- disposal of ecologically sensitive land, tax on, 207.31
- donations to, *see* Gifts and donations (charitable)
- exemption, 149(1)(f)
- foreign, *see* Foreign charity
- gifts received, 149.1(12)(b)
- grants to outside organizations that are not charities, 149.1(1) "qualifying disbursement"
 - • disclosure on public information return, Reg. 3703
 - • permitted, 149.1(1) "charitable organization" (a.1), 149.1(1) "charitable purposes", 149.1(2)(b), (c), (3)(b), (b.1), (4)(b), (b.1), (4.1)(d), (21)
- loan to donor, 118.1(16)
- political activities, 149.1(1.1)
- specified gifts, 149.1(1.1)
- terrorism support, *see* Charities Registration (Security Information) Act

Charity trusts, employees'

- receipts, Reg. 3502

Chartered accountant, *see* Accountant

Chattels

- seizure of, for unpaid tax, 225

Cheque

- dishonoured
 - • penalty for, 220(3.8); *Financial Administration Act* s. 155.1(2)(a)
 - • restarts 10-year collection limitation, 222(6)(c)

Chief source of income

- determination by Minister, 31

Child, *see also* Age; Dependant; Intergenerational transfers; Income-splitting tax; Minor

- adopted, 252(1)
- defined, *see* extended meaning of (*below*)
- dependent, 118(6)(a)
 - • credit for, 118(1)B(d), (e)
- disability benefit, 122.61(1)M
- disposition of property to, 40(1.1)
- extended meaning of, 70(10), 75.1(2), 110.6(1), 252(1); ITAR 20(1.11), 26(20)
- family farm or fishing corporation transferred to, 70(9.3), (9.31)
- farm or fishing property transferred to, 44(1.1), 70(9), (9.01); ITAR 26(18), (19)
 - • from spouse's trust, 70(9.1), (9.11)
- financially dependent
 - • meaning of, 146(1.1)
 - • rollover of benefits paid to on taxpayer's death
 - • • from RPP, 60(1)(v)(B.01)
 - • • from RRSP, 146(1) "refund of premiums" (b)
- income-splitting tax, 120.4
- infirm, credit, 118(1)B(d), (e)
- kiddie tax, 120.4, *see also* Income-splitting tax

- killed or missing due to crime, *see* Parent (human): compensation for child
- maintenance payments for, *see* Support payments (spousal or child)
- property transferred to
 - • gain or loss deemed to be transferor's, 75.1
- support of, deemed, 56(6), (7)

Child Benefit, *see* Canada Child Benefit

Child care expenses, 63

- cross-border commuter, 63(4)
- deduction for, 63(1), 63(2.2), 64.1
- defined, 63(3)
- "earned income" defined, 63(3) "earned income"
- eligible child, 63(3) "eligible child"
- residents absent from Canada
 - • deduction, 64.1
 - • school or university, attendance at, 63(2.2)
 - • supporting person, 63(3) "supporting person"
 - • taxpayer's income vs. supporting person's income, 63(2), (2.1)

Child care space amount

- defined, 127(9)

Child care space creation

- investment tax credit, 127(9) "investment tax credit" (a.5)
- • recapture if not kept for 5 years, 127(27.1)–(27.12)

Child Disability Benefit, 122.61(1)M

Child fitness tax credit, *see* Children's Fitness Credit (pre-2017)

Child support, *see* Support payments (spousal or child)

Child support amount

- defined, 56.1(4), 60.1(4)
- whether deductible, 60(b), 60.1
- whether taxable, 56(1)(b), 56.1

Child Tax Benefit, *see* Canada Child Benefit

Child tax credit (pre-2015), 118(1)B(b.1)

Children's Arts Tax Credit (pre-2017), 118.031, Reg. 9401

Children's Fitness Credit (pre-2017), 122.8

China, *see also* Foreign government

- universities, gifts to, Reg. Sch. VIII, s. 14

Chinaware

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

Chiropractor, *see* Professional practice

Chitalia case overruled, 146.01(2)(b) exception

Chose in action, as property, 248(1)

Christmas party exemption

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

Chrysler Canada Incorporated

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

Church, *see also* Charity

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

Citizen, *see* Canadian citizen

Civil Air Search and Rescue Association

- volunteers, tax credit, 118.07

Civil law

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

Civil marriage, *see* Same-sex marriage

Civilian War Pensions and Allowances Act

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

Claim liability

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

Claim preparer (SR&ED claim)

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

Claim preparer information (SR&ED claim)

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

Claim year

- defined, 152(6.1)(b)

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

Class of animal

- defined, Reg. 1802(5)

Class of beneficiaries

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

Class of shares

- includes series, 248(6)

Classes of property, *see* Capital cost allowance

Classification society

- defined, Reg. 3600(2)

Clawback

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

Clean energy investments, Reg. Sch. II:Cl. 43.1

Clean hydrogen

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

Clear days

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

Clearance certificate, 159(2)

- failure to obtain, 159(3)

Clearing or levelling farm land

- cost deductible, 30

Clergy

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

Clerical or secretarial services

- no liability for penalty for misrepresentation, 163.2(9)
- no liability for penalty for section 160 avoidance planning, 160.01(3)
- no requirement to report reportable transaction, 237.3(4)

Client

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

Climate Action Incentive, 122.8

- liability for refund of overpayment, 160.1(1.2)

Climate risk disclosure report

- requirement to publish if claiming CCUS tax credit, 211.93(2)
- contents of, Reg. 8200.4(1)
- how to be published, Reg. 8200.4(2)

Closing business, *see* Ceasing to carry on business

Closely held corporation

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

Club

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

Coaching services, *see* Job coaching services

Coal, *see also* Mineral resource

- flow-through shares eliminated after March 2023, 66(12.6)(b.2)
- included in definition of “mineral”, 248(1)
- mine, allocation of depletion allowance, 65(3)

Coal mine operator

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

Cobalt, *see* Critical mineral

Cod fishermen, *see* Fishing: compensation programs

Cogeneration

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

Cohabiting spouse or common-law partner

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

Collateralized preferred shares

- restriction on dividend deductibility, 112(2.4)

Collection agreement

- application of payments under, 228

Collection-commencement day

- defined, 225.1(1)

Collection of tax, 222–229

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

College, *see* Tuition fees; University

Collins case overruled, 143.4

Colostomy pads, as medical expense, 118.2(2)(i)

Combustion turbine

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

Comfort letters, *see* Table of Comfort Letters

Commencement

- defined, *Interpretation Act* 35(1)

Commencement day

- child support not deductible or taxable if agreement made or varied after, 56(1)(b)B, 60.1(b)B
- defined, 56.1(4), 60.1(4)

Commercial debt obligation, *see also* Commercial obligation

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

Commercial obligation, *see also* Commercial debt obligation

- debt forgiveness
 - defined, 80(1), 80.01(1), 80.02(1), 80.03(1)(a), 80.04(1)

Index

- Commercial obligation (*cont'd*)
- • disposition of in exchange for another issued by same person, 40(2)(e.2)
 - • • addition to adjusted cost base, 53(1)(f.12)
 - foreign tax credit
 - defined, 126(7)
- Commercial traveller**, *see* Salesperson
- Commission**
- mutual fund, limited partnership financing, 18.1
 - unearned, reserve for, 32
 - withholding tax, 153(1)(g), Reg. 102(2), (5)
- Commission agent**
- deductions, 8(1)(f)
 - • automobile or aircraft costs, 8(1)(j), 8(9), 13(11)
 - • certificate of employer, 8(10)
- Commissioner of Revenue**
- appointed, *Canada Revenue Agency Act* s. 25
 - authorized to exercise powers of Minister, 220(1)
- Commitment time**
- defined, 20.3(1)“weak currency debt”
- Committee, return by**, *see also* Legal representative
- deemed to be legal representative, 248(1)“legal representative”
 - obligations of, 159
 - return required by, 150(3)
- Common carrier**
- railway assets, capital cost allowance, Reg. 1100(1)(z.1c), 1101(5d.2), Reg. Sch. II:Cl. 35
- Common law**
- equally authoritative to civil law, *Interpretation Act* 8.1, 8.2
- Common-law partner**, *see also* Spouse
- defined, 248(1)
 - transfer of property to, 160(1)
- Common-law spouse**, *see* Common-law partner
- Common question**
- appeal of one taxpayer binding on others, 174
- Common Reporting Standard**, 270–281
- definitions, 270(1)
 - financial institution due-diligence requirements, 272–277
 - financial institutions required to report non-residents’ accounts, 271, 278
 - • excluded accounts, 270(1)“excluded account”, Reg. 9006
 - prescribed excluded accounts, Reg. 9006
 - prescribed non-reporting financial institutions, Reg. 9005
- Common share**, *see also* Share
- consideration for property transferred to corporation, 85(1)(h)
 - defined
 - • for small business investment capital gain rollover, 44.1(1)
 - • generally, 248(1)
- Commonwealth**
- defined, *Interpretation Act* 35(1)
- Communal organization**
- definitions, 143(4)
 - election to allocate gifts to members, 143(3.1)
 - rollover to new trust, 248(1)“disposition”(f)(vi)
 - rules re, 143(1)
 - specification of member of family, effect of, 143(5)
 - taxable income, election re, 143(2), (3)
- Communication of information (by CRA)**, 241
- Canada Child Benefit, 241(4)(j.2); Reg. 6500
 - charities and RCAAAs, regarding, 149.1(15), 241(3.2)
 - offence of unauthorized use or disclosure, 239(2.2)–(2.22)
 - police officer, to, 241(4)(p)
 - prohibition against, 241(1), (2)
 - statistical purposes, 241(1)(d)(ix), 241(4)(e)(x), 241(4)(o)
- Community Development bonds, eligible for RRSP investment**, Reg. 4900(1)(i.1)
- Community Economic Development Corporation (Nova Scotia)**
- qualified investment for deferred income plans, Reg. 4900(1)(i.11)
- Community Heroes benefit**
- tax-free benefit to families, 81(1)(j)
- Commutation of annuity, payment on**
- source withholding, 153(1)(f)
- Commutation of benefits, pension plan**, Reg. 8503(2)(m), (n), 8503(2.1)
- insolvent employer
 - • rollover to RRSP, 146(5.2), (5.201)
 - • transfer to another RPP, Reg. 8517(3)–(3.02)
- Commuter to United States**
- charitable gifts, 118.1(9)
 - child care expenses, 63(4)
 - retirement plan contributions, Canada-U.S. Tax Treaty:Art. XVIII:14
 - tuition credit, 118.5(1)(c)
 - • transfer of, to supporting person, 118.9(1)
- Compact discs**, *see* Audio tapes or CDs
- Companies’ Creditors Arrangement Act**
- provisions override third-party garnishment, 224(1.2)
- Company**, *see also* Corporation
- defined, Canada-U.S. Tax Treaty:Art. III:1(f)
- Compensation**
- capital property, for, 54“proceeds of disposition”
 - certain payments exempt, 81(1)(d)
 - cod fisherman *see* Fishing: compensation programs
 - defined for RPP purposes, 147.1(1), Reg. 8507
 - depreciable property, for, 13(21)“proceeds of disposition”
 - from Federal Republic of Germany, exempt, 81(1)(g)
 - limits pension contribution, 147.1(8), (9)
 - payment, *see* Securities lending arrangement: compensation payment
 - taxable, 5, 6, 9
 - to customer or client, trust income exempt, 149(1)(w)
- Compete, agreement not to**, *see* Restrictive covenant (or non-competition payment)
- Competent authority**
- agreement based on tax treaty deemed valid, 115.1
 - arbitration of disputes, Canada-U.S. Tax Treaty:Art. XXVI:6
 - defined, Canada-U.S. Tax Treaty:Art. III:1(g); Canada-U.K. Tax Treaty:Art. 3:1(f)
 - exchange of information, Canada-U.S. Tax Treaty:Art. XXVII
 - mutual agreement procedure, Canada-U.S. Tax Treaty:Art. XXVI
- Complaint**, *see* Information or complaint
- Complete period of reduced services**
- defined, Reg. 8300(1)
- Completion**
- defined, Reg. 1104(2)
 - of a specified oil sands mine development project, defined, 66.1(6)
 - of a specified development phase of a taxpayer’s oil sands project, defined, Reg. 1104(2)
- Completion date (for qualifying home under Home Buyers’ Plan)**
- defined, 146.01(1)
- Compliance order**
- after conviction of offence, 238(2)
 - compliance with audit or demand, 231.7
 - • time contesting, not to count for reassessment clock, 231.8
- Compound interest**
- deduction for, 20(1)(d)
 - late payments and refunds, 248(11)

Compression equipment

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

Computation of income, 3

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

Computation of tax, Reg. Part I

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

Computer

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

Computer-operating aids for blind person

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

Computer software, *see also* Software

- defined, Reg. 1104(2)

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

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

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

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

Concrete finisher

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

Conditional sale, repossession, *see* Surrender: of property to creditor**Conditions**

- defined, for transfer pricing rules, 247(1.4)

Condominium, *see* Home**Condominium corporation, 149(1)(l)****Confederation Life failure**

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

Confidential protection

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

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

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

Connected affiliate

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

Connected contributor

- defined, 94(1)

Connected partnership

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

Connected person

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

Connected person or partnership

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

Connected shareholder

- defined, Reg. 4901(2)–(2.2)

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

- meaning of, 248(8)

Consideration, *see also* Inadequate consideration

- defined, for digital platform operator reporting rules, 282(1)
- unreasonable
 - from non-resident, 247
 - rent, royalty, etc.
 - non-resident, paid by, 247
 - non-resident, paid to, 247
- whether trust interest acquired for consideration, 108(7)

Consolidated financial statements

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

Consolidated group

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

Consolidated net surplus rules

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

Consolidation (of shares)

- effect on stock option rules, 110(1.5)

Consolidation accounting method

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

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

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

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

- defined, Reg. 238(1)

Index

- Construction activities (*cont'd*)
 - information return required, Reg. 238(2)
- Construction and completion knowledge sharing report**
 - defined, for CCUS knowledge sharing, 211.92(1)
- Construction contracts**
 - information return, Reg. 238
- Construction electrician**
 - apprenticeship job creation credit, 127(9)“investment tax credit”
- Construction equipment**
 - “qualified” defined, 127(9)
- Construction job site**
 - travel to, by tradesperson or apprentice, deduction, 8(1)(q.1)
- Construction of building**
 - home for disabled person, medical expense, 118.2(2)(l.21)
 - soft costs, rules, 18(3.1)–(3.7), 20(29)
- Construction work camp**
 - deduction for meals at, 67.1(2)(e.1)
 - exemption for board, lodging and transportation, 6(6)
- Constructive receipts**
 - indirect payments, 56(2)
- Consul**, *see* Diplomat
- Consumer goods or services**
 - defined, 135(4), Reg. 4901(2)
- Consumer Price Index**
 - defined, Reg. 8500(1)
- Consumer Price Index adjustment**, *see* Indexing (for inflation)
- Consumer’s Gas case overruled**, 12(1)(x)
- Contact information**
 - defined, re disclosure of taxpayer information, 241(10)
 - disclosure of, 241(4)(l)
- Containers**
 - deposit received for, income, 12(1)(a)(ii)
 - • repayment of, deductible, 20(1)(m.2)
 - reserve for, deductible, 20(1)(m)(iv)
- Contemplated shareholder**
 - defined, for shareholder-benefit rules, 15(1.4)(a)
- Contemporaneous documentation**
 - required for transfer pricing audit purposes, 247(4)
- Contiguous zone**
 - defined, *Interpretation Act* 35(1)
- Continental Bank of Canada case overruled re Crown raising new issue on appeal**, 152(9)
- Continental shelf**
 - application of legislation to, *Interpretation Act* 8(2.2)
 - defined, *Interpretation Act* 35(1)
- Contingency funds**, Reg. 3202
- Contingent amount**
 - defined, 143.4(1)
 - excluded from expenditures, 143.4(2)
- Contingent liability**
 - limitation on deductibility, 18(1)(e), 143.4(2)
- Continuance outside Canada**, 219.1, 250(5.1)
 - treaty rule, Canada-U.S. Tax Treaty:Art. IV:3
- Continuity**
 - previous version of Act, ITAR 75, 77
- “Contra” interest**
 - on instalment payments, 161(2.2)
- Contract**
 - annuity, *see* Annuity contract
 - employment, consideration for entering into, 6(3)
 - investment, *see* Investment contract
 - life annuity, 148(10)
 - payments under, combined income and capital, 16(1)
 - pension plan, under, 254
 - person employed to negotiate
 - • expenses incurred, deduction, 8(1)(f)
 - • • certificate of employer, 8(10)
 - rectification of, 169(1) (Notes)
- Contract payment**
 - by federal government or Crown corporation, information return, Reg. 237
 - defined, 127(9), (25)
 - included in income, 9(1), 12(1)(x)
 - paid, not counted as qualifying for ITC, 127(18)
 - prescribed amount, Reg. 4606
- Contract to provide information to CRA**, *see* Informant payments
- Contractors’ movable equipment**, Reg. Sch. II:Cl. 10(h), Sch. II:Cl. 22, Sch. II:Cl. 38
- Contractual protection**
 - defined, for reportable transaction rules, 237.3(1)
- Contractual service margin**
 - defined
 - • for determining insurer’s capital, 138(12), 181(2), Reg. 8600
 - • for insurers’ IFRS transition rules, 138(12), Reg. 2400(1)
 - • for insurers’ policy reserves, Reg. 1408(1)
 - • for Part VI tax on financial institutions, 190(1)
- Contravene**
 - defined, *Interpretation Act* s. 35(1)
- Contributed property**
- Contributed surplus**
 - addition to adjusted cost base, 53(1)(c)
 - calculation of, 84(10), (11)
 - conversion into paid-up capital
 - • amalgamations, 87(2)(y)
 - • no dividend deemed, 84(1)(c.1)–(c.3)
 - • restrictions, 84(10)
- Contribution**
 - charitable, *see* Gifts and donations (charitable)
 - defined
 - • for non-resident trusts, 94(1), 94(2)(s)–(u)
 - • for political contributions, Reg. 2002(1)
 - political, *see* Political contribution
 - to RESP, defined to exclude CESG, 146.1(1)
- Contributor**
 - defined
 - • for affiliated-person rules, 251.1(3)
 - • for non-resident trusts, 94(1)
 - • re disposition to trust, 107.4(1)
- Control of corporation**, 112(6)(b), 256(1.2), *see also* Associated corporations
 - 75% of value counting as control, 256.1
 - acquired after beginning of year, investment tax credit, 127(9.2)
 - acquired before end of year, investment tax credit, 127(9.1)
 - acquisition of, *see also* change of (below)
 - • because of death, effect on windup, 88(1)(d.3)
 - • deemed time of, 256(9)
 - • exceptions, 256(7)(a)
 - amalgamation deemed not acquisition of, 88(4)
 - certain shares excluded from fair market valuations, 256(1.6)
 - change of, *see also* Loss restriction event
 - • adjusted cost base of non-depreciable capital property, 53(2)(b.2)
 - • adventure in the nature of trade, inventory writedown, 10(10)
 - • application of unused surtax credit, 190.1(6)
 - • bad debts non-deductible, 111(5.3)
 - • business investment losses, 111(8)“net capital loss”C(b)
 - • Canadian resource expenses, reduction of, 66.7(12)

Index

Control of corporation (*cont'd*)

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

Controlled corporation, *see also* Corporation

- meaning, 256(5.1)

“Controlled, directly or indirectly”

- meaning, 256(5.1)

Controlled foreign affiliate, *see also* Foreign affiliate

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

Controlled foreign company tax regime

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

Controlling individual

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

Controlling persons

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

Convention, *see* Tax treaty

Convention expenses

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

Convention organizer relief (COVID), Reg.

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

Convention refugee, *see* Refugee

Conventional lands

- defined, 1206(1)

Conversion

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

Conversion benefit

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

Conversion cost

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

Convertible debenture, *see* Convertible property

Convertible obligation, 51.1

Convertible property, 51; ITAR 26(24)

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

Cook

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

Cooling-off period

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

Cooperative corporation, 135, 136

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

Coopers & Lybrand case overruled, 227(5)

Copper, *see* Critical mineral

Copy of document

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

Copyright

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

Copyright owner

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

Coronavirus, *see* COVID-19

Corporate distributions tax, 183.1

Index

Corporate emigration, 219.1

Corporate information

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

Corporate officers

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

Corporate partnerships

- small business deduction, 125(6)

Corporate surplus, *see* Surplus stripping

Corporate surtax (before 2008), 123.2

Corporate tax reduction, *see* Corporation: tax rate

Corporation

- acquiring depreciable property
 - • change of control in 12-month period, 13(24), (25)
- acquisition of control, *see* Control of corporation: change of
- acquisition of own shares, deemed dividend, 84(3)
- additional tax on excessive election, 184
- airline, taxable income earned in a province, Reg. 407
- allowance, re investment in property in Canada, 219(1)(j), Reg. 808
- amalgamation of, *see* Amalgamation
- annuity contract, interest in, 12.2
- appropriations of property by shareholders, 15(1), 69(4)
 - • inadequate considerations, 69(5)
- appropriations to shareholders
 - • on winding-up, deemed dividend, 84(2), (6)
- assets disposed of to, for shares
 - • shares deemed capital property, 54.2
- associated, *see* Associated corporations
- bankrupt
 - • exempt from Part IV tax, 186.1
 - • rules applicable, 128(1)
- becoming or ceasing to be exempt, 149(10)
 - • superficial loss rule inapplicable, 54“superficial loss”(g)
- becoming resident in Canada, 128.1(1)
- benefit conferred on shareholder, 15(1), (7)
 - • deemed, 15(9)
- bus operators, taxable income earned in a province, Reg. 409
- buying back shares for excessive amounts
 - • excess deemed dividend substitute, 183.1(3), (4)
- “Canadian”
 - • defined, 89(1)
 - • “taxable” defined, 89(1)“taxable Canadian corporation”
 - • winding-up of, rules, 88(2)
- Canadian-controlled private, defined, 125(7)
- cancellation of shares, 84(3), (6)
- ceasing to be resident in Canada, 128.1(4)
- change of control, *see* Control of corporation: change of
- charitable donations deduction, 110.1
- connected, 186(4)
- consolidation accounting method, prohibited, 248(24)
- continuance outside Canada, 219.1, 250(5.1)
- control of, *see* Control of corporation
- controlled, 186(2)
 - • capital loss on property transferred to, 40(3.3), (3.4)
 - • charitable foundation, by, 149.1(12)
 - • disposition of shares of
 - • • amalgamation, 87(2)(kk)
 - • exchanges of property, 44(7)
 - • share for share exchange, 85.1(2)(b)
 - • shares of, disposition of, 40(2)(h)
- cooperative, *see* Cooperative corporation
- Crown, *see* Crown corporation
- deduction from tax, *see* Deductions in computing tax
- deemed member of partnership, 125(6.1)
- deemed not resident, 250(5)
 - • deemed resident in Canada, 250(4)
 - • defined, 248(1), *Interpretation Act* s. 35(1)
 - • director of, *see* Director (of corporation)
 - • distributions, tax payable on, 183.1(2)
 - • • exceptions, 183.1(6)
 - • divided business, Reg. 412
 - • dividend received by, 112
 - • • dividend rental arrangements, no deduction allowed, 112(2.3)
 - • • short-term preferred share, on, 112(2.3)
 - • • where no deduction permitted, 112(2.1)–(2.9)
 - • emigration of, 219.1
 - • execution of documents, 236
 - • exempt, *see* Exempt corporation; Exemptions
 - • family farm or fishing, *see* Family farm or fishing corporation/partnership
 - • farm loss
 - • • carryforward rules where control changed, 111(5)–(5.3)
 - • fiscal period of, 249.1(1)(a), 249.1(1)(b)(iii)
 - • foreign business corporation, *see* Foreign business corporation
 - • gifts made by
 - • • capital property, election for lower proceeds, 110.1(2.1), (3)
 - • • charitable, 110.1(1)(a)
 - • • deduction for, 110.1(1)
 - • • institution, to, 110.1(1)(c)
 - • • partnership, by, 110.1(4)
 - • • proof of, 110.1(2)
 - • grain elevator operators
 - • • taxable income earned in a province, Reg. 408
 - • housing
 - • • exemption, 149(1)(i), (n)
 - • immigration of, 128.1
 - • income of, defined, 125(7)“income of the corporation for the year from an active business”
 - • incorporated in Canada, defined, 248(1)“corporation”, “corporation incorporated in Canada”
 - • indirect payment to person paid through intermediary as proceeds of disposition of property, 183.1(5)
 - • information return
 - • • by private corporation, under Part IV, 187(1)
 - • instalment payment of tax, 157(1), Reg. 5301
 - • • “first instalment base” defined, 161(9)(b)
 - • • insufficient, 161(2)
 - • • • limitation, 161(4.1)
 - • • “second instalment base” defined, 161(9)(b)
 - • insurance, *see* Insurance corporation
 - • interest
 - • • accrued, 12(3)
 - • • deduction by certain corporations, 18(4)–(8)
 - • investment, *see* Investment corporation
 - • issue of stock rights, 15(1)(c)
 - • joint exploration, *see* Joint exploration corporation
 - • large, tax on, *see* Large corporations tax (Part I.3)
 - • life insurance, *see* Life insurance corporation; Life insurer
 - • life insurance policy, interest in, 12.2
 - • loan by
 - • • non-resident, from, 90(6)–(15)
 - • • non-resident, to, 17
 - • • persons connected with shareholder, to, 15(2)
 - • • shareholder, to, 15(2)
 - • • • between non-residents, 15(2.2)
 - • • • from foreign affiliates, 90(6)–(15)
 - • • wholly-owned subsidiary, to, 218
 - • loan to, attribution rules, 74.4
 - • manufacturing and processing, 125.1
 - • member of non-resident-controlled partnership
 - • • specified partnership income deemed nil, 125(6.2)
 - • mortgage investment, 130.1
 - • municipal, exempt, 149(1)(d.5)

Index

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

Index

Corporeal property

- defined,
- • *Quebec Civil Code*, art. 906 (energy)

Corrections officer

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

Corruption of public officials

- no deduction for, 67.5

Cosmetic surgery

- disallowed as medical expense, 118.2(2.1)

Cost, *see also* Adjusted cost base; Capital cost; Rollover

- acquisition, of
- • capitalized interest, 21
- • land, 18(2), (3.1)
- • • included in inventory, 10(1.1)
- • non-arm's length transaction, 69(1)(a), (c)
- • property owned Dec. 31/71, ITAR 26(3), (4)
- • taxpayer becoming resident of Canada, ITAR 26(10)
- amount, *see* Cost amount
- borrowed money, of, capitalized interest, 21
- depreciable property, 13(7.1)
- emissions allowance, of, 27.1(2)
- farm or fishing property transferred to child
- • *inter vivos*, 73(3.1)(e)
- • on death, 70(9.01)(b)(ii)
- gift, of, 69(1)(c)
- property after immigrating to Canada, 128.1(1)(c)
- property received from partnership, 98(3), (5)
- property seized for non-payment of debt, 79.1(6)
- property whose value included in income, 52
- share of corporation that becomes resident in Canada, 52(8)
- tax shelter investment, 143.2(6)

Cost amount, *see also* Adjusted cost base

- defined
- • for capital interest in a trust, 108(1)
- • generally, 248(1)
- • stock dividend, 52(3)

Cost base of property, *see also* Adjusted cost base

- additions to, 53(1)
- adjustments to, 53
- deductions from, 53(2)
- "relevant" to foreign affiliate, 95(4)

Cost of capital

- defined, 125.2(1), Reg. 5202, 5203(1), 5204

Cost of labour

- defined, 125.2(1), Reg. 5202, 5203(1), 5204

Cost of manufacturing and processing capital

- defined, Reg. 5202, 5204

Cost of manufacturing and processing labour

- defined, Reg. 5202, 5204

Cost of the particular property

- meaning of, for ITC recapture rules, 127(32)

Costs, *see* Court: costs; Legal costs

Costumes

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

Counselling services

- investment, *see* Investment counselling fees
- value of, not included in employee's income, 6(1)(a)(iv)

Counterparty

- affiliated, 112(2.32)(a)
- affiliated specified, 112(2.32)(b)(ii)(A)(II)
- meaning of, for synthetic equity arrangements, 112(2.34), 248(1)"synthetic equity arrangement"(a)(i)
- specified, 112(2.32)(b)(ii)(A)(I)

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

Countries, *see* Prescribed countries

Country club, *see* Club

Country-by-country report

- defined, 233.8(3)

Country-by-country reporting, 233.8

- filing obligation, 233.8(3)
- penalty for non-compliance, 162(7)(a)

Country-specific foreign expenses

- defined, for resource expenses of limited partner, 66.8(1)(a)(i)(D)

Coupons

- cashed for non-resident, tax and statement required, 215(2), 234
- identification of, 240(2)
- ownership certificate required, 234
- stripped bond, *see* Stripped bond

Court, *see also* Judge

- appeal to, *see* Appeal; Tax Court of Canada
- compliance orders
- • after conviction of an offence, 238(2)
- • re audit or demand for information, 231.7
- costs
- • awarded against taxpayer, treated as debt owing, 222.1

Covenant

- amount receivable for, on sale of property, 42
- ecologically sensitive land, value when donated, 110.1(5), 118.1(12)
- • valuation applies for capital gains purposes, 43(2)

Coverage

- under life insurance policy, defined, Reg. 310, 1401(3)

Covered entity

- defined, for stock buyback tax, 183.3(1)

Covid-19, *see* COVID-19 (at beginning of 'C' entries)

Craig case overruled, 31(1)

"Created by the taxpayer's will"

- meaning of, 248(9.1)

Credit, *see* Tax credits

Credit rating agency

- prescribed, Reg. 4900(2)

Credit-related gains and losses, effect on securities held, 142.4(7)B

Credit union, *see also* Financial institution

- "allocation in proportion to borrowing" defined, 137(6)
- allocation of taxable dividends and capital gains, 137(5.1), (5.2)
- amalgamation of, in Quebec, 87(2.3)
- "bonus interest payment" defined, 137(6)
- deemed not to be private corporation, 137(7)
- defined, 137(6), 248(1)
- deposit insurance corporation deemed not to be, 137.1(7)
- disposition of Canadian security, 39(5)(b)
- federal, *see* Federal credit union
- general provisions, 137
- member, defined, 137(6)
- member's income, 137(5)
- paid-up capital of, 89(1)"paid-up capital"(b)
- Requirement for Information, electronic delivery of, 231.2(1.1)
- reserves
- • maximum cumulative, defined, 137(6)
- share of, meaning, 248(1)"share"
- small business deduction, 137(3), (4)
- transitional, ITAR 58

Credit union central

- defined, for international electronic funds transfer reporting, 244.1

Creditable United States tax

- defined, 122.7(1)

- Creditor**, *see also* Loan
- acceleration clause exercised by, 20(1)(n)
 - defined, 79(1), 79.1(1), 80.01(3)
 - property acquired on foreclosure by, 79
 - seizure of property by, 79.1
 - surrender of property to, 79
- Creditor affiliate**
- defined
 - for foreign currency rules, 39(2.1)
 - application to FAPI, 95(2)(g.04)
 - for upstream loan rules, 90(6)
- Creditor partnership**
- defined, for upstream loan rules, 90(6)
 - application to FAPI, 95(2)(g.04)
- Credits**, *see* Tax credits
- Cremation services**, *see* Eligible funeral arrangement; Funeral services
- Crew**
- defined, Reg. 105.1(1)
- Crib death monitor, medical expense**, Reg. 5700(r)
- Criminal Injuries Compensation Board**
- payments exempt, 81(1)(q), Reg. 6501
- Criminal offences**, *see* Offences
- Criminal proceedings**
- secrecy provision not applicable, 241(3)
- Critical mineral**
- defined, 127(9)
 - tax credit, *see* Critical Mineral Exploration Tax Credit
- Critical Mineral Exploration Tax Credit**
- expenditures that qualify, 127(9)“flow-through critical mineral mining expenditure”
 - investment tax credit of 30%, 127(5)(a)(i), 127(9)“investment tax credit”(a.21)
 - carryforward or carryback, 127(9)“investment tax credit”(c)
 - reduction for assistance received, 127(11.1)(c.21)
- Croatia**, *see also* Foreign government
- universities, gifts to, Reg. Sch. VIII, s. 18
- Crop insurance program**, *see* Farm Income Protection Act; Drought or flood region
- Cross-border amalgamation**, 128.2
- Cross-border class**
- defined, for foreign affiliate dumping rules, 212.3(4)
 - anti-avoidance rule, 212.3(6)
- Cross-border purchase butterfly**, 55(1), (3.1), (3.2)
- Cross-border worker**, *see* Commuter to United States
- Crown**, *see also* Government
- corporation, *see* Crown corporation
 - death of, *Interpretation Act* s. 46
 - gifts to
 - by corporation, 110.1(1)(a), 149.1(1)“qualified donee”(d)
 - by individual, 118.1(1)“total charitable gifts”, 149.1(1)“qualified donee”(d)
 - not bound by legislation, *Interpretation Act* s. 17
 - bound by deemed trust for tax withheld, 227(4.3)
 - bound by garnishment orders, 224(1.4)
 - bound by regulations requiring information returns, 221(3)
 - bound by withholding tax requirements, 227(11)
 - royalty, *see* Crown royalty
- Crown charge rebate**
- included in income, 12(1)(x.2)
- Crown corporation**
- bonds of, no non-resident tax on interest paid, 212(1)(b)(ii)(C)(IV)
 - corporation controlled by, not private corporation, 89(1)“private corporation”
 - debt held by federal government, excluded from capital tax, 181(1)“long-term debt”
 - debt of, as qualified investment for RRSPs etc., Reg. 4900(1)(q)
 - deemed not private corporation for Part IV tax, 227(16)
 - exemption for, 149(1)(d)–(d.4)
 - election to remain taxable, 149(1.11)
 - excluded where prescribed, 27(2)
 - federal, prescribed, Reg. 7100
 - prescribed, deemed not private corporation, 27(2)
 - reporting of contract payments, Reg. 237
 - subject to Part I tax, 27(2), 124(3)
 - subject to Part I.3 tax, 181.71
 - subject to Part IV.1 tax, 187.61
 - subject to Part VI tax, 190.211
 - subject to Part VI.1 tax, 191.4(3)
 - transfer of unused resource expenses, 66.6
- Crown foundation**
- donation to, 149.1(1)“qualified donee”(d)
 - by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
- Crown royalty**
- refund or rebate of, income inclusion, 12(1)(x.2)
- Cruise terminal relief (COVID)**, Reg. 8901.1(2)(b)(xvi), *see also* Qualifying tourism or hospitality entity
- Crutches**
- as medical expense, 118.2(2)(i)
- Culpable conduct**
- defined, for third-party penalty, 163.2(1)
- Cultural events relief (COVID)**, Reg. 8901.1(2)(b)(iv), *see also* Qualifying tourism or hospitality entity
- Cultural program for children**, *see* Children’s Arts Tax Credit (pre-2017)
- Cultural property**, *see also* Art; Canadian Cultural Property Export Review Board
- Canadian art, CCA claims allowed, Reg. 1102(1)(e)
 - disposition of, 39(1)(a)(i.1)
 - by institution or public authority, tax on, 207.3
 - excluded from capital gains rules, 39(1)(a)(i.1)
 - fair market value, determination of, 118.1(10), (11)
 - gift of
 - by corporation, 110.1(1)(c)
 - by individual, 118.1(1), (7.1)
- Culvert**
- capital cost allowance for, Reg. Sch. II:Cl. 1(c)
- Cumulative Canadian development expense**, *see also* Canadian development expense
- deduction for, 66.2(2)
 - reduction of, on debt forgiveness, 80(8)(c)
 - short taxation year, 66(13.1)
- Cumulative Canadian exploration expense**, *see also* Canadian exploration expense
- deduction for, 66.1(2), (3)
 - defined, 66.1(6)
 - reduction of, on debt forgiveness, 80(8)(b)
 - trust, of
 - reduced by investment tax credit, 127(12.3)
- Cumulative Canadian oil and gas property expense**, *see also* Canadian oil and gas property expense
- deduction for, 66.4(2)
 - defined, 66.4(5)
 - reduction of, on debt forgiveness, 80(8)(d)
 - short taxation year, 66(13.1)
- Cumulative eligible capital (pre-2017)**, 14 [repealed]; *see now* Goodwill
- Cumulative excess amount**
- ALDA (advanced life deferred annuity)
 - defined, 205(1)

Index

- Cumulative excess amount (*cont'd*)
- tax on, 205(2)
 - RRSP contributions, 62
 - defined, 204.2(1.1)
 - tax on, 204.1(2.1)
- Cumulative foreign resource expense**
- defined, 66.21(1)
- “Cumulative gains limit” defined**, 110.6(1)
- computation, on amalgamation, 87(2)(pp)
- Cumulative net investment loss**
- defined, 110.6(1)
 - reduced by taxable capital gains where exemption not available, 110.6(1)“investment income”(f)
 - reduces capital gains exemption available, 110.6(1)“cumulative gains limit”, 110.6(2)(b), 110.6(2.1)(b)
- Cumulative offset account**
- computation, on amalgamation, 87(2)(pp)
- Cumulative reserve**
- maximum, of credit union, 137(6)
- Cumulative unused excess capacity**
- defined, for interest deduction restrictions, 18.2(1), 248(1)
 - after change in control (loss restriction event), 111(5.01)
 - transfer of to related corporation, 18.2(4)
- Curator**, *see also* Legal representative
- deemed to be legal representative, 248(1)“legal representative”
 - obligations of, 159
 - return required by, 150(3)
- Currency**, *see also* Foreign exchange
- blocked
 - income in, postponement of tax, 161(6)
 - calculation of foreign affiliate’s gain or loss in, 95(2)(f)
 - fluctuation, *see* Foreign exchange: fluctuations in
- Current amount (on disposition of specified debt obligation)**, *see also* Residual portion (on disposition of specified debt obligation)
- application of, 142.4(4)
 - defined, 142.4(7)
- Current nature**
- expenses required to be for SR&ED deduction, 37(1)(a)
 - meaning of, 37(8)(d), 37(14)
 - amounts that are not current expenses of recipient, 37(14), (15)
- Current reference period**
- defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)
- Custodial account**
- defined, for Common Reporting Standard, 270(1)
- Custodial institution**
- defined, for Common Reporting Standard, 270(1)
- Custodian**
- of employee benefit plan
 - defined, 248(1)“employee benefit plan”
 - of eligible funeral arrangement
 - defined, 148.1(1)
 - repayment of funds by, taxable, 148.1(3), 212(1)(v)
 - of property where solicitor-client privilege claimed
 - defined, 232(1)
 - of retirement compensation arrangement
 - defined, 248(1)“retirement compensation arrangement”
- Custom Processing**
- treated as gross revenue from a mine, Reg. 1104(5.1)
- Customs Act**
- communication of information for enforcement of, 241(4)(d)(ii)
- Customs and Revenue Agency**, *see* Canada Revenue Agency
- Cutlery**
- capital cost allowance for, Reg. 1100(1)(e), Reg. Sch. II:Cl. 12(b)
- Cutting rights**
- capital cost allowance, separate classes, Reg. 1101(3)
- Czech Republic**, *see also* Foreign government
- stock exchange recognized, 262
 - universities, gifts to, Reg. Sch. VIII, s. 16
- ### D
- DC**, *see* Distributing corporation
- DFA**, *see* Derivative forward agreement
- DIC**, *see* Deposit insurance corporation
- DIEP**, *see* Designated immediate expensing property
- DLAD**, *see* Designated liquidation and dissolution
- DPSP**, *see* Deferred profit sharing plan
- DQ**, *see* Disbursement quota (of charity)
- DRA**, *see* Dividend rental arrangement
- DRA share**
- defined, 248(1)
- DRD**, *see* Dividend received deduction
- DRIP**, *see* Dividend reinvestment plan
- DSLPP (Deferred salary leave plan)**, *see* Sabbatical arrangement
- DTC**, *see* Disability tax credit; Dividend tax credit
- DVD**, *see* Digital video disk (DVD)
- Daily compounding of interest**, 248(11)
- Dairy, farming**, 248(1)“farming”
- Dam**
- capital cost allowance, Reg. Sch. II:Cl. 1(d)
 - for mine, Reg. Sch. II:Cl. 10(l)
- Damages**
- taxation of, 9(1); IT-365R2
 - wrongful dismissal, for, *see* Retiring allowance
- Damis Properties case overruled**, 160(5)(a)
- Dancer**
- deduction from employment income, 8(1)(q)
- Data cable**
- capital cost allowance, Reg. Sch. II:Cl. 42(b)
- Data communication equipment**
- capital cost allowance, Reg. Sch. II:Cl. 3
- Data network infrastructure equipment**
- capital cost allowance, Reg. Sch. II:Cl. 46
 - defined, Reg. 1104(2)
- Data processing equipment**, *see* Computer
- Dates**, *see* Deadlines; Filing deadlines; Reassessment
- Daughter-in-law, as child of taxpayer**, 252(1)(c)
- Day camp**, *see* Child care expenses
- Day care**, *see* Child care expenses
- Day of mailing**
- constitutes date assessment or determination made, 244(15)
 - presumed to be same as date appearing on notice, 244(14)
- Days**
- calculation of, *Interpretation Act* s. 27
- De facto control test**
- “controlled, directly or indirectly in any manner whatever”, 256(5.1)
- Deadline**
- defined, for insurance demutualization, 139.1(1)
- Deadlines**
- extension of, by CRA, 220(3.2)
 - labour-sponsored venture capital corporation investments, 127.4(5.1)
 - RRSP contributions, 146(22)
 - payment of tax, *see* Payment of tax

Index

Deadlines (*cont'd*)

- prosecution, *see* Limitation periods
- reassessments, *see* Reassessment
- returns, *see* Filing deadlines
- tax remittances, *see* Remittance of taxes withheld
- transfer pricing, *see* Documentation — due date

Deaf person, *see also* Hearing impairment

- deaf-blind intervening services
 - • disability supports deduction, 64(a)A(ii)(M)
 - • medical expense credit, 118.2(2)(1.44)
- devices to assist, business expense, 20(1)(rr)
- disability credit, 118.3
- guide dog, expenses, 118.2(2)(l)
- lip reading or sign language training, 118.2(2)(l.3)
- medical expenses, 118.2(2), Reg. 5700
- real-time captioning services, *see* Captioning services
- rehabilitative therapy, 118.2(2)(l.3)
- sign language interpretation services, *see* Sign language

Dealer compensation payment

- defined, for securities lending arrangement, 260(1)

Dealer (or trader)

- automobile, standby charge for sales employees, 6(2.1)
- in resource rights, 66(5)
- in securities, *see* Securities: dealer, trader or agent

Death, *see also* Death of taxpayer

- danger of, communication of taxpayer information relating to, 241(3.1)
- funeral arrangements, *see* Eligible funeral arrangement; Funeral services
- Queen, of, *Interpretation Act* s. 46

Death benefit

- Canada Pension Plan, *see* Canada Pension Plan/Quebec Pension Plan: death benefit
- defined, 248(1)
- emigration of survivor, no deemed disposition, 128.1(10)“excluded right or interest”(h)
- flowed through trust or estate, 104(28)
- from ALDA (advanced life deferred annuity), taxable, 146.5(3)
- income, 56(1)(a)(iii)
- lump sum
 - • transfer from RPP, 147.3(7)
- withholding of tax, 153(1)(d)

Death duties

- interest on, deductible, 60(d)

Death of taxpayer

- amounts receivable, 70(2)
- business income, effect on, 34.1(8)(a)
- business year-end income inclusion, 34.1(9)
- business year-end not calendar year, 34.1(8), (9)
- capital losses deductible against all income, 111(2)
- charitable donations carryback
 - • carryback, 118.1(4)
 - • claim against 100% of net income, 118.1(1)“total gifts”(a)(ii)
 - • donation of non-qualifying security, 118.1(15)
 - • donations made by will or by estate, 118.1(1)“total charitable gifts”(c), 118.1(5.1)
 - • • gift of art, 118.1(7)(c)
- Class 14.1 property (goodwill), 70(5.1)
- computation of income on, 70(1)
- consequences of, meaning, 248(8)
- debt forgiveness rules do not apply to extinguishment of debt by bequest, 80(2)(a)
- debt obligation settled by estate, 80(2)(p), (q)
- deemed proceeds of disposition of property, 70(5)–(10)
- disposition of property on, 70(5)–(10)
 - • definitions, 70(10)“child”
 - • legal representative, by, 164(6)

- • ordering, 70(14)
- disposition of right to share in partnership income, 96(1.5)
- elections, Reg. Part X
- eligible capital property (now Class 14.1 property), 70(5.1)
- entitlement to benefits on
 - • deemed, spouse, 146(8.91)
 - • other than spouse, by, 146(8.8), (8.9)
- farming business, no inventory adjustment, 28(1) closing words
- first home savings account, 146.6(1)“annual FHSA limit”(c)(ii), 146.6(13)–(15)
- forward averaging, 110.4(4) [repealed]
- funeral services provided from eligible funeral arrangement, no tax, 148.1(2)(b)(i)
- gifts, time of, 118.1(4)
- goodwill, 70(5.1)
- Home Buyers’ Plan income inclusion or rollover, 146.01(6), (7)
- instalments not required after, 156.1(3)
- investment tax credit, income inclusion re, 70(1)(b)
- land inventories, 70(5.2)
- last annuitant under registered retirement income fund, 146.3(6)–(6.2)
- life estate in real property, termination of, 43.1(2)
- Lifelong Learning Plan income inclusion or rollover, 146.02(6), (7)
- minimum tax not applicable, 127.55
- net capital loss, 111(2)
- notification to CRA by spouse required for Canada Child Benefit purposes, 122.62(5)(a)
- occurrences as a consequence of, 248(8)
- partner return, 150(4)
- partnership
 - • value of rights or things, 53(1)(e)(v)
- partnership interest, transfer of, 100(3)
- payment by employer, *see* Death benefit
- payment of tax
 - • election to pay in instalments, 159(5)
 - • property passing to spouse or trust, 70(6)
 - • proprietor, return needed, 150(4)
 - • RPP contributions deductible, 147.2(6)
- RRIF
 - • income inclusion to deceased, 146.3(6), (6.2)
 - • losses after death, carryback to deceased’s last year, 146.3(6.3), (6.4)
- tax-paid amounts, *see* Tax-paid amount
- RRSP
 - • distribution to child or grandchild, 60(1)(v)(B.01), (B.1), 146(1)“refund of premiums”(b)
 - • income inclusion to deceased, 146(8.8), (8.9)
 - • losses after death, carryback to deceased’s last year, 146(8.92), (8.93)
 - • tax-paid amounts, *see* Tax-paid amount
- reserves not deductible, 72(1)
- resource properties, 70(5.2)
- return required, 150(1)(b), (e)
 - • where none filed, 150(1)(e)
- rights or things, 70(2)
 - • transferred to beneficiaries, 70(3)
- separate return, 70(2)
 - • minimum tax carryover not applicable to, 120.2(4)
- single payment from deferred profit sharing plan, 147(10.1), (10.2)
- spouse or spouse trust, property transferred to, 70(6)
- stock options, effect on, 7(1)(e)
- TFSA, 146.2(9), 207.01(1)“exempt contribution”, 207.01(3)
- tax on, 70(1), (5)
- termination of life estate, 43.1(2)
- transfer of partnership interest, 98.2

Debenture, *see* Bond; Convertible property

Index

- Debt**, *see also* Commercial obligation; Debt obligation; Indebtedness
- amalgamation, on, 87(2)(h)
 - assets acquired from foreign affiliate for settlement of, 80.1(5)
 - assumption of, debt forgiveness rules do not apply, 80(1)“forgiven amount”B(1)
 - bad, *see* Bad debt
 - corporation, of,
 - qualified investment for RRSP etc., 204“qualified investment”(c.1), Reg. 4900(1)(i)
 - deficiency, 84.2(2), (3)
 - defined, re seizure of property by creditor, 79(1), 79.1(1)
 - disposition of, *see* Debt obligation: disposition of
 - doubtful, reserve for, 12(1)(d), 20(1)(l)
 - foreign currency, denominated in, 79(7), 80(2)(k), 80.01(11)
 - forgiveness, *see* Debt forgiveness
 - long-term
 - defined, 190(1)
 - non-qualifying
 - owing to registered charity, 189
 - trust for benefit of spouse, 70(8)(b)
 - owed by corporation, adjusted cost base, 53(2)(p)
 - owing by non-resident to corporation resident in Canada, 17
 - parking, *see* Debt parking
 - rescheduling or restructuring, expenses deductible, 20(1)(e)(ii.2), 20(1)(e.1)(iii)
 - security received in satisfaction of, 76
 - seizure of property for payment of
 - effect on creditor, 79.1
 - effect on debtor, 79
 - settlement of, *see* Debt forgiveness
 - share issued in settlement of, 80(2)(g), (g.1)
 - statute-barred, deemed settled, 80.01(9)
 - subsequent payments, 80.01(10)
 - testamentary
 - trust for benefit of spouse, 70(8)(c)
 - unpaid tax, etc., as, 222(2)
- Debt forgiveness**, 80–80.04, *see also* Settlement of debt
- amalgamation, on, 80.01(3)
 - application of remaining balance
 - adjusted cost base of capital property, 53(2)(g.1), 80(9)–(11)
 - allowable business investment loss carryforwards, 80(4)(a)
 - capital cost of depreciable property, 13(7.1)(g), 80(5)
 - capital gain to absorb current capital losses, 80(12)
 - capital property, 53(2)(g.1), 80(9)–(11)
 - cumulative Canadian development expense, 66.2(5)“cumulative Canadian development expense”M.1, 80(8)(c)
 - cumulative Canadian exploration expense, 66.1(6)“cumulative Canadian exploration expense”J.1, 80(8)(b)
 - cumulative Canadian oil and gas property expense, 66.4(5)“cumulative Canadian oil and gas property expense”I.1, 80(8)(d)
 - farm losses, 80(3)(b)
 - foreign exploration and development expenses, 66(4)(a)(iii), 80(8)(e)
 - income inclusion, 80(13), (14)
 - net capital losses, 80(4)(b)
 - non-capital losses, 80(3)(a), 80(4)(a)
 - ordering of rules, 80(2)(c), 248(27)
 - related corporations’ shares and debt, 53(2)(g.1), 80(11)
 - resource expenditures, 80(8)
 - restricted farm losses, 31(1.1)(b), 80(3)(c)
 - successor pools, 66.7(2)(a)(ii), 66.7(3)(a)(ii), 66.7(4)(a)(iv), 66.7(5)(a)(iii), 80(8)(a)
 - undepreciated capital cost pool, 80(5)(b), 80(6)
 - bequest or inheritance, rules do not apply, 80(2)(a)
 - corporation to shareholder, taxable benefit, 15(1.2)
 - death, rules do not apply, 80(2)(a)
 - debt issued in settlement of debt, 80(2)(h)
 - debt of deceased settled by estate, 80(2)(p), (q)
 - employer to employee, taxable benefit, 6(15)
 - foreign affiliate’s gain or loss on, 95(2)(i)
 - foreign currency debt, 80(2)(k), 80.01(11)
 - forgiven amount, *see* Forgiven amount (re settlement of debt)
 - guarantee, payment under, 80(2)(l)
 - history preservation rules, 47(1), 49(3.01), 51(1), 53(4)–(6), 86(4), 87(5.1), (6.1)
 - reduction of adjusted cost base, 53(2)(g.1)
 - income inclusion, 12(1)(z.3), 80(13), (14)
 - corporation in financial difficulty, 61.3
 - interest deemed to be separate obligation, 80(2)(b)
 - partnership, by, 80(15)
 - R&D expenditures, effect on, 37(1)(f.1)
 - reserve, 61.2–61.4
 - residual balance
 - defined, 80(14)
 - income inclusion, 80(13)
 - settlement, meaning of, *see* Settlement of debt
 - share issued in settlement of debt, 80(2)(g), (g.1)
 - simultaneous settlement of obligations, 80(2)(i)
 - subsequent disposition, capital gain, 80.03(2)
 - surrender of property
 - by debtor to creditor, 79(3), 79.1
 - subsequent to debt forgiveness, 80.03(2)
 - transfer of forgiven amount to related person, 80.04
 - winding-up, 80.01(4)
- Debt obligation**, *see also* Commercial obligation; Investment contract; Specified debt obligation
- accrued interest on, 12(3)–(10)
 - adjusted cost base, 53(2)(l)
 - amalgamation, acquired in, 87(2)(e.2)
 - assumption of, expenses deductible, 20(1)(e)(ii.2), 20(1)(e.1)(iii)
 - deduction for over-accrual, 20(21)
 - defined, *see also* Commercial debt obligation; Indexed debt obligation; Specified debt obligation
 - re prepayments, 18(9.1), (9.2)
 - re qualified investments, 204
 - discounted, *see* Bond: discount
 - disposition of
 - in exchange for other debt obligation, 40(2)(e.2)
 - addition to adjusted cost base, 53(1)(f.12)
 - to related person, 40(2)(e.1)
 - addition to adjusted cost base, 53(1)(f.1), (f.11)
 - whether capital loss allowed, 40(2)(g)(ii)
 - escalating interest, accrual, Reg. 7000(2)(c.1)
 - extended meaning of, 248(26)
 - for penalties, bonuses and rate reduction payments, 18(9.1)
 - for prepaid interest rules, 18(9.2)
 - for purposes of scientific research tax credit, 127.3(2)“scientific research and experimental development tax credit”(d)
 - generally, not defined
 - first registered holder of
 - election re scientific research tax credit, 127.3(9)
 - increasing interest rate, accrual, Reg. 7000(2)(c.1)
 - interest on, 20(14.1)
 - issued by partnership, 80(13)E(a), 80(14)(b), 80(15), (18)
 - deemed, 80(2)(n)
 - owing by related person, no loss permitted on disposition, 40(2)(e.1)
 - partial obligation treated the same as entire obligation, 248(27)
 - prescribed
 - accrued interest on, Reg. 7000
 - deemed accrual of interest, 12(9)
 - exception, 12(9.1)
 - re donations to charities, 38(a.1)(i), Reg. 6210

- Debt obligation (*cont'd*)
- qualifying, *see* Qualifying debt obligation
 - settlement of, *see* Debt forgiveness
 - specified, *see* Specified debt obligation
 - used or held in insurance or moneylending business
 - “eligible property” for transfer to corporation by shareholder, 85(1.1)(g)
- Debt parking**, 80.01(6)–(8)
- deemed settlement of debt, 80.01(8)
 - subsequent payment of debt, 80.01(10)
 - to avoid foreign exchange gain, 39(2.01)–(2.03)
 - application when functional currency election made, 261(10.1)
 - application when functional currency election revoked, 261(14.1)
- Debt substitute share**
- defined, Canada-U.S. Tax Treaty:Art. XXIX-A:5(a)
- Debtor**
- defined, 80(1), 80.01(1), 80.04(1)
 - gain on settlement of debts, 80(1), Reg. Part LIV
- Deceased person**, *see* Death of taxpayer
- Decline in value of property**
- inventory writedown, 10(1), (1.01)
 - rules preventing transfer of losses, 13(21.2), 40(3.3), (3.4)
- Dedicated geological storage**
- defined, 127.44(1)
 - prescribed provinces and jurisdictions, Reg. 8200.3
- Decoder**
- television, visually displaying vocal portion of signal
 - medical expense, Reg. 5700(q)
- Deductible**
- defined, for hybrid mismatch arrangement rules, 18.4(1)
- Deduction**
- or set-off, recovery of taxes by, 224.1
- Deduction component**
- defined, for hybrid mismatch arrangement rules, 18.4(7)(a), 18.4(11)(b), 18.4(13)(b), 18.4(15)(b)
- Deduction/non-inclusion mismatch**
- defined, for hybrid mismatch arrangement rules, 18.4(6), 18.4(7)(c)
 - effect of, 18.4(7)
- Deductions in computing income**, *see also* Deductions in computing income from business or property; Deductions in computing income from office or employment; Deductions in computing taxable income
- alimony payments, 60(b)
 - amounts transferred as retiring allowance, 60(j.1)
 - Canadian exploration expenses, 66.1(2), (3)
 - capital element of annuity, 60(a)
 - “carved-out income”, 66(14.6)
 - child care expenses, 63
 - cost of borrowed money, 21
 - costs re construction of building or ownership of land, 18(3.1)–(3.7)
 - cumulative Canadian development expenses, 66.2(2)
 - short taxation year, 66(13.1)
 - cumulative Canadian oil and gas property expense, 66.4(2)
 - short taxation year, 66(13.1)
 - cumulative offset account, 66.5
 - deemed residents, 64.1
 - deposit insurance corporation, 137.1(3)
 - limitation, 137.1(4)
 - disability supports deduction, 64
 - dividend from foreign affiliate, 20(13), 113(1)
 - employee benefit plan, 32.1
 - employer’s contributions
 - deferred profit sharing plan, 147(8), (9)
 - employees profit sharing plan, 144(5)
 - registered supplementary unemployment benefit plan, 145
 - FHSA, contributions to, 60(i), 146.6(5)
 - foreign exploration and development expenses, 66(4)
 - short taxation year, 66(13.1)
 - foreign taxes, re, 91(4)
 - insurance corporation
 - amounts paid or credited to policyholders, 140(1)
 - interest on death duties, 60(d)
 - legal expenses of collecting or establishing right to pension benefit etc., 60(o.1)
 - maintenance payments, 60(b), (c), 60.1
 - mental/physical impairment
 - attendant care expenses, 64(a)A(ii)(J)
 - mortgage on depreciable property, loss from sale of, 20(5), (5.1)
 - moving expenses, 62
 - Part I.2 tax payable, 60(w)
 - patronage dividend, 135(1)
 - carryover of, 135(2.1)
 - provincial pension plan contributions, 146(21.1)
 - RRSP, premiums under, 60(i), 146.6(5)
 - refund of income payments, 60(q)
 - refund of RRSP premium transferred to annuity, 60(l)
 - refund of undeducted past service additional voluntary contributions, 60.2(1)
 - repayment of overpayment of certain benefits, 60(n)
 - repayment of policy loan, 60(s)
 - residents absent from Canada, 64.1
 - resource and processing allowances, Reg. Part XII
 - resource expenses
 - successor corporation, 66.7
 - retirement compensation arrangement
 - benefit from, 60(t)
 - contributions to, 20(1)(r)
 - disposition of interest in, 60(u)
 - scientific research and experimental development, 37
 - succession duties applicable to certain property, 60(m.1)
 - superannuation benefits transferred to another plan, 60(j)
 - support payments, 60(b), (c), 60.1
 - trusts of, 104(6)–(8)
 - uncollectible proceeds of disposition, 20(4)–(4.2)
- Deductions in computing income from business or property**, *see also* Deductions in computing income
- accrued interest on transferred bond, 20(14)
 - amount deemed to be tax payable, 20(1)(ll)
 - bad debts, 20(1)(p)
 - CPP/QPP contributions, 8(1)(1.1), 60(e)
 - cancellation of lease, 20(1)(z), (z.1)
 - capital cost allowance, *see* Capital cost allowance
 - depletion, *see* Depletion allowances
 - discount on certain obligations, 20(1)(f)
 - dividend from foreign affiliate, 20(13), 113(1)
 - employer’s contributions
 - deferred profit sharing plan, 20(1)(y), 147(8), (9)
 - pension plan, 20(1)(q), 147.2(1)
 - limitation, 20(22)
 - special, 20(1)(r)
 - profit sharing plan, 20(1)(w)
 - supplementary unemployment benefit plan, 20(1)(x)
 - expense of issuing shares or borrowing money, 20(1)(e)
 - exploration and development grants, 20(1)(kk)
 - foreign taxes
 - exceeding 15%, 20(11)
 - guarantee fees etc., 20(1)(e.1)
 - injection substances, 20(1)(ll)
 - interest
 - accrued on purchased bond, 20(14)
 - compound, 20(1)(d)
 - paid on borrowed money, 20(1)(c)

Index

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

- inventory adjustment, 20(1)(ii)
- investigation of site, 20(1)(dd)
- investment counsel fee, 20(1)(bb)
- landscaping, 20(1)(aa)
- life insurance corporation, 138(3)
- limitations on, 18(1), (11)
- mineral resources, 65
- mining taxes, 20(1)(v)
- oil or gas wells, 65
- patronage dividend, 20(1)(u)
- permitted, 20(1)
- prepaid expenses
 - limitation re, 18(9)
- repayment of amount previously included, 20(1)(m.2)
- repayment of inducement, 20(1)(hh)
- repayment of shareholder's loan, 20(1)(j)
- representation expenses, 20(1)(cc)
- reserves, *see* Reserve
- salary deferral arrangements, 20(1)(oo)
- scientific research and experimental development, 37
- share transfer fees, 20(1)(g)
- terminal loss, 20(16)
- utilities service connection, 20(1)(ee)
- western grain stabilization levy, 20(1)(ff)

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

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

Deductions in computing tax, *see also* Tax credits

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

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

- amounts exempt under tax agreements, 110(1)(f)(i)
- annual adjustment, 117.1
- capital gains, 110.6

- corporations
 - gifts, 110.1
- dividend
 - from foreign affiliate, 113
 - received by corporation, 112
- employee stock options, 110(1)(d), (d.1)
- *Income War Tax Act*, under, ITAR 17(2)
- indexing, 117.1
- losses of other years, 111
- medical expenses, *see* Medical expenses
- member of religious order, 110(2)
- net capital losses, 111(1)(b), 111(1.1), (2)
- non-capital losses, 111(1)(a)
- order of applying provisions, 111.1
- other, permitted, 110
- Part VI.1 tax, 110(1)(k)
- part-year resident, 114
- separate returns, 114.2
- social assistance payments, 110(1)(f)(iii)
- unemployment insurance benefit repayment, 110(1)(i)
- workers' compensation payments, 110(1)(f)(ii)

Deemed disposition, *see* Disposition: deemed

Deemed dividend, *see* Dividend: deemed

Deemed overpayment, *see* Overpayment of tax: deemed

Deemed realization of gains, *see* Disposition: deemed

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

Deer, 80.3(1)“breeding animals”

Defaulting taxpayer, 226

Defence forces, *see* Canadian Forces and veterans

Deferral, *see also* Rollover

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

Deferred amount, defined, 248(1)

Deferred annuity out of pension plan, 254

Deferred income

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

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

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

Deferred payment

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

Deferred profit sharing plan

- age 71 maturity, 147(2)(k), 147(10.6)
- amount received from, income, 56(1)(i)
- amount taxable, 147(18), 201
- anti-avoidance rule, 147(18), (22)
- annuity purchased by, *see* purchase of annuity by (*below*)
- conditions, 147(2)
- continuation of, in amalgamation, 87(2)(q)

Index

- Deferred profit sharing plan (*cont'd*)
 - defined, 147(1), 248(1)
 - definitions, 147(1), 204
 - disposal of shares
 - deduction re amount, 110(1)(d.3)
 - disposition of property to, capital loss nil, 40(2)(g)(iv)(A)
 - distribution deemed disposition, 200
 - emigration of employee, no deemed disposition, 128.1(10)“excluded right or interest”(a)(iv)
 - employee contributions prohibited, 147(2)(a.1), 147(14)(c.2)
 - employer’s contribution
 - deductible, 20(1)(y), 147(8), (9)
 - limitations, 18(1)(j), 147(5.1), 147(9)
 - not includable in employee’s income, 6(1)(a)(i)
 - terms limiting, 147(2.1)
 - where not deductible, 147(9.1)
 - estate receiving benefits from, 104(27.1)
 - “excess amount” defined, 204.2(4)
 - excluded from various trust rules, 108(1)“trust”(a)
 - forfeited amounts, 147(2)(i.1), 147(10.3)
 - defined, 147(1)
 - reallocation of, 147(2.2)
 - forfeitures, tax on, 201
 - initial non-qualified investment, defined, 204
 - insurance corporation demutualization conversion benefit, 139.1(12), (14)
 - interest on money borrowed to invest in, whether deductible, 18(11)(c)
 - life insurance policies, 198(6)–(8)
 - lump-sum payment
 - remuneration, Reg. 100(1)
 - maturity by age 71, 147(2)(k), 147(10.6)
 - money borrowed for contribution to
 - limitation on deductibility, 18(11)(c)
 - non-deductible employer contributions prohibited, 147(2)(a.1), 147(14)(c.2)
 - non-qualified investments of, defined, 204
 - not employees profit sharing plan, 147(6)
 - overcontribution to, 204.1(3)
 - participating employer, meaning of, 147(1.1)
 - payment out of profits, meaning of, 147(16)
 - payment under
 - non-resident, to, 212(1)(m)
 - taxable, 147(10)
 - withholding of tax, 153(1)(h)
 - property
 - appropriation of, by employer, 147(13)
 - disposition or acquisition of, for inadequate consideration, 147(18)
 - purchase of annuity by, 147(2)(k)(vi)
 - qualified investment, defined, 204“qualified investment”
 - qualified investments, Reg. Part XLIX
 - defined, 204
 - registration of, 147(2)–(5), Reg. 1501
 - revocation, 147(14), (15)
 - reversionary trust rules do not apply, 75(3)(a)
 - revocation of, 147(14), (22)
 - revoked plan
 - defined, 204, Reg. 4901(2)
 - “excess amount” defined, 204.2(4)
 - payments under, subject to withholding of tax, 153(1)(h)
 - rules applicable, 147(15)
 - RRIF may accept transfer from, 146.3(2)(f)(iv.1)
 - shares included in single payment on retirement etc., 147(10.1), (10.2)
 - disposal of, 147(10.4), (10.5)
 - single payment on withdrawal, 147(10.1), (10.2), (10.4)–(12), Reg. 1503
 - surrender of rights
 - on marriage/relationship breakdown, 147(2)(e)(i)
 - to avoid revocation, 147(2)(e)(iii)
 - tax on forfeitures, 201
 - tax on initial non-qualified investments, 199
 - tax on non-qualified investments, 198
 - distribution deemed disposition, 200
 - refund
 - on disposition, 198(4)
 - on recovery of property given as security, 198(5)
 - return required, 202(1)
 - tax on overcontributions to, 204.1
 - tax payable by
 - on acquisition of shares not at fair market value, 207.1(5)
 - on holding certain property, 207.1(2)
 - tax where inadequate consideration on purchase or sale, 201
 - taxation year of, 144(11)
 - transfer to
 - capital loss deemed nil, 40(2)(g)(iv)(A)
 - DPSP, from, 147(19)
 - transfer from
 - ALDA (advanced life deferred annuity), to, 147(19)(d)(v)
 - DPSP, to, 147(19)(d)(iii)
 - excess, 147(22)
 - registered pension plan, to, 147(19)(d)(iii)
 - registered retirement income fund, 147(19)(d)(iv)
 - registered retirement savings plan, to, 147(19)(d)(ii)
 - restrictions re, 147(21)
 - spouse/partner’s RRSP, RRIF or RPP on breakdown of relationship, 147(2)(e)(i), 147(19)(b)(ii)
 - taxation of amount transferred, 147(20)
 - trust, through, to RPP or RRSP, 104(27.1)
 - trust under, exempt, 147(7), 149(1)(s)
- Deferred salary leave plan**, *see* Sabbatical arrangement
- Deficit affiliate**
 - defined, Reg. 5905(7.1)(a)
- Defined benefit limit**
 - defined, Reg. 8500(1)
- Defined benefit provision**
 - defined, 147.1(1)
- Defined contribution provision**, *see* Money purchase provision
- Definitions**, *see also* the specific defined terms
 - application of, *Interpretation Act* s. 15
 - capital gains exemption rules, 110.6(1)
 - capital property rules, 54
 - charities, 149.1(1)
 - corporations, 89
 - foreign affiliate rules, 95
 - general, 248
 - insurance rules, 138(12), 148(9), Reg. 1408
 - investment tax credit rules, 127(9)
 - registered pension plans, 147.1(1)
 - registered retirement income funds, 146.3(1)
 - registered retirement savings plans, 146(1)
 - regulations, *Interpretation Act* s. 16
 - relationships, 251–252
 - resource taxation, 66(15), 66.1(6), 66.2(5), 66.4(5)
 - small business rules, 125(7)
 - terms used in regulations, *Interpretation Act* s. 16
 - trusts, 108
- Delay**
 - undue, in rendering account for services, 12(1)(b)(ii)
- Delegation of powers and duties of Minister**
 - administrative, 220(2.01)
 - by regulation, 221(1)(f) (repealed), Reg. Part IX (repealed)
- Deliberate over-contribution (to TFSA)**
 - benefit attributable to, constitutes advantage, 207.01(1)“advantage”(c)(i)

Index

- Deliberate over-contribution (to TFSA) (*cont'd*)
- defined, 207.01(1)
- Delineated transaction or series**
- defined, for transfer pricing rules, 247(1.1)–(1.3)
- Demand**
- by Minister
 - actuarial report, for registered pension plan, Reg. 8410
 - books and records, to retain, 230(7)
 - documents, for, 231.2(1)(b)
 - information, for, 231.2(1)(a)
 - electronic delivery to bank or credit union, 231.2(1.1)
 - information return, for, 233
 - return, for, 150(2)
 - proof of failure to comply with, 244(7), (8)
 - proof of service, 244(5), (6)
 - third party, *see* Garnishment for taxes unpaid
 - time contesting, not to count for reassessment clock, 231.8
- Demutualization, 139.1**
- defined, 139.1(1)
 - effect of, 139.1(4)
 - holding corporation, *see* Holding corporation (insurance demutualization)
 - paid-up capital following, 139.1(6), (7)
 - rollover of ownership rights into shares, 139.1(4)(a), (d)
 - time of, 139.1(2)(i)
- Denmark, *see also* Foreign government**
- stock exchange recognized, 262
- Density**
- hydrocarbons, determination of, Reg. 1107
- Dental Benefit Act payment**
- CRA can share taxpayer info for purposes of administration, 241(4)(d)(xx), (xx.1)
 - exempt from tax, 81(1)(t)
- Dental bills, as medical expense, 118.2(2)(a)**
- Dental instruments (small)**
- capital cost allowance for, Reg. Sch. II:Cl. 12(e)
- Dental mechanic**
- payments to, as medical expenses, 118.2(2)(p)
- Dental plan, *see* Private health services plan**
- Dentist, *see also* Professional practice**
- defined, 118.4(2)
- Department of Canadian Heritage, *see* Canadian Heritage, Department of**
- Department of Energy, Mines and Resources**
- certificate re Class 34 property, Reg. 1104(11)
 - certificate re mineral deposit, 248(1)“mineral resource”(d)(i)
 - certificate re oil or gas well, 66.1(6)“Canadian exploration expense”(d)(iv), 66.1(10)
 - communication of information to, 241(4)(d)(v)–(vi.1)
 - consultation re mine capacity, Reg. Sch. II:Cl. 1(l), Sch. II:Cl. 28(b)(ii)
 - consultation re pipeline, Reg. Sch. II:Cl. 1(l), Sch. II:Cl. 2(b)
 - determination of prescribed energy conservation property, 13(18.1), 241(4)(d)(vi.1)
- Department of Finance comfort letters, *see* Table of Comfort Letters**
- Department of Fisheries and Oceans Act, *see* Northern Cod Compensation and Adjustment Program**
- Department of Human Resources Development, *see* Human Resources Development Canada**
- Department of Labour Act**
- s. 5, income assistance payments under, *see* Older Worker Adjustment, Program for
- Department of National Revenue, *see* Canada Revenue Agency**
- Department of Natural Resources**
- technical guide to Class 43.1 and 43.2, binding for ITA purposes, 13(18.1)
 - technical guide to carbon capture, binding for ITA purposes, 13(18.2)
- Department of Social Development Act**
- program under, to compensate parents of child victims of crime, taxable, 56(1)(a.3)
- Departure tax, *see* Ceasing to be resident in Canada**
- Dependant**
- alimony or maintenance paid to, 118(5)
 - child, credit for, 118(1)B(b.1), (d)
 - credit for, 118(1)B(b), (d)
 - apportionment of, 118(4)(e)
 - deemed resident, of
 - also deemed resident, 250(1)(f)
 - defined, 118(6), Reg. 8500(1)
 - infirm, *see* Infirm dependant
 - medical expenses of, 118.2(2)(a)
 - mental or physical impairment, 118.2(2)(b), (c), 118.3(2), 118.4
 - notch provision, 117(7), 118.2(1)D
 - partial
 - mental or physical impairment, 118.3(3)
 - spouse, 118(1)B(a)
 - wholly dependent persons, credit for, 118(1)B(b)
 - limitation, 118(4)
- Dependants’ relief acts, trust created by, 70(6.1)**
- Dependent personal services, *see* Employment: income from**
- Depletion allowances, *see also* Resource allowance**
- gas well, 65, Reg. Part XII
 - lessee and lessor, allocation between, 65(3)
 - mineral resource, 65, Reg. Part XII
 - coal mine, allocation, 65(3)
 - mining exploration, Reg. 1203
 - oil well, 65, Reg. Part XII
 - supplementary, Reg. 1212
 - timber limit, 65
- Depletion base, *see* Earned depletion base; Mining exploration depletion base; Supplementary depletion base**
- Deployed operational mission**
- deduction for Canadian Forces or police income while serving on, 110(1)(f)(v)(A)
- Deposit**
- eligible, *see* Eligible deposit
 - insurance corporation, *see* Deposit insurance corporation
 - on container
 - as income, 12(1)(a)(ii)
 - deduction when repaid, 20(1)(m.2)
 - reserve for, 20(1)(m)(iv)
 - specified, *see* Specified deposit
- Deposit accounting insurance policy**
- defined, 138(12), Reg. 1408(1)
- Deposit balance**
- of insurer, defined, Reg. 2400(1)
- Deposit insurance corporation, *see also* Canada Deposit Insurance Corporation**
- amounts included in income, 137.1(1), (10)
 - amounts not included in income, 137.1(2)
 - deductions in computing income, 137.1(3)
 - limitation, 137.1(4)
 - payments to member institutions, 137.1(11)
 - deemed not credit union, 137.1(7)
 - deemed not private corporation, 137.1(6)
 - deeming provision re, 137.1(5.1)
 - defined, 137.1(5)
 - for purposes of dividend gross-up and tax credit, 89(15)
 - investment property, defined, 137.1(5)
 - member institution
 - defined, 137.1(5)

Index

- Deposit insurance corporation (*cont'd*)
- payments by, deductible in computing income, 137.1(11)(a)
 - repayment deductible in computing income, 137.1(11)(b)
 - repayment excluded from income of previous year, 137.1(12)
 - security for payment of tax, 220(4.3), (4.4)
 - no high-gross-up dividends, 89(1)“general rate income pool”A:E(b)
 - not subject to mark-to-market rules, 142.2(1)“financial institution”(c)(iv)
 - principal amount of interest payable, 137.1(10.1)
 - property owned since before 1975, 137.2
 - special tax rate, 137.1(9)
 - transfer of premiums from another deposit insurance corporation, 137.1(2)(b)
 - transfer of premiums to another deposit insurance corporation, 137.1(4)(d)
 - wholly-owned subsidiary deemed deposit insurance corporation, 137.1(5.1)
- Depository**
- RRIF, *see* RRIF: depository
 - RRSP, *see* RRSP: depository
 - TFSA, *see* TFSA: depository
- Depository account**
- defined, for Common Reporting Standard, 270(1)
- Depository institution**
- defined, for Common Reporting Standard, 270(1)
- Depository receipt**, *see* American Depository Receipt
- Depreciable property**, *see also* Capital cost allowance
- acquired
 - amalgamation, on, 87(2)(d), (d.1)
 - by transfer, amalgamation or winding-up, Reg. 1102(14), (14.1)
 - capital cost, 13(5.2)
 - non-arm’s length, 13(7)(e), Reg. 1102(20)
 - corporations controlled by one trustee, 13(7.3)
 - partner’s cost, ITAR 20(4)“acquisition cost”
 - with government assistance, deemed capital cost, 13(7.1), (7.2)
 - additions and alterations, Reg. 1102(19)
 - amortization, *see* Capital cost allowance
 - available for use, 13(26)–(32), 20(28), (29), Reg. 1100(2)
 - borrowing money for, 21(3)
 - capital, disposed of
 - capital cost, 13(5.4)
 - lease cancellation payment, 13(5.5)
 - recaptured depreciation, 13(5.3)
 - capital cost, *see* Capital cost
 - capital cost allowance, *see also* Capital cost allowance
 - classes, Reg. Sch. II
 - capitalization of interest, 21(1), (3)
 - reassessment, 21(5)
 - certain transactions after 1971, ITAR 20(1.2)
 - change in proportions of use, 13(7)(d), 13(9)
 - change in use
 - deemed acquisition/disposition, 13(7)(a), (b), 13(9)
 - classes, for capital cost allowance, Reg. Sch. II
 - inclusions in, Reg. 1103
 - transfers between, Reg. 1103
 - cost of money borrowed to acquire, 21(1)
 - election, 21(1)
 - deductions allowed, Reg. Part XI
 - deemed, Reg. 1101(5g)
 - capital cost allowance, Reg. Sch. II:Cl. 36
 - separate classes, Reg. 1101(5g)
 - deemed capital cost of, 13(7.4)
 - deemed disposition/reacquisition
 - capital cost, deemed, 13(7)(f)
 - on death, 70(5)
 - defined, 13(21)
 - includes leasehold interest or option for limited purposes (partnership rollout), 98(7)
 - on windup of corporation, 88(1)(c.7)
 - depreciation, *see* Capital cost allowance
 - disposition of
 - after ceasing business, 13(8)
 - bad debt on, 20(4)
 - capital gain on, 39(1)(a)
 - on death
 - order of disposition, 70(14)
 - to child, farming or fishing property, 70(9), (9.01)
 - to spouse, 70(6); ITAR 20(1.1)
 - proceeds of disposition, defined, 13(21)
 - recapture, up to original cost, 13(1)
 - terminal loss, where no property left in class, 20(16)
 - divided use
 - change in ratio of uses, 13(7)(d)
 - deemed cost/proceeds of income-producing part, 13(7)(c)
 - dividend in kind, ITAR 20(1.4)
 - election re
 - deemed, 44(4)
 - exchanges of, 13(4)
 - exclusions from classes, Reg. 1102
 - first-year rule, Reg. 1100(2)–(2.4)
 - half-year rule, Reg. 1100(2)–(2.4)
 - manufacturing and processing business, acquired for
 - deemed capital cost of, 13(10)
 - manufacturing and processing enterprises, Reg. 1102(15), (16)
 - misclassified, 13(6)
 - prescribed class, of
 - transferred to corporation by shareholder, 85(1)(e), (e.1), (e.3), (e.4)
 - proceeds of disposition of, 13(21)
 - receipt of government grant, 13(7.1), (7.2)
 - recreational property, Reg. 1102(17)
 - replacement for, 13(4), (4.1)
 - rollover of
 - to corporation, 85(1)(e), 85(5)
 - to partnership, 97(2)
 - to trust, 107.4(3)(d)
 - sale of, *see* disposition of (*above*)
 - sale of mortgage, etc., 20(5), (5.1)
 - separate classes, Reg. 1101
 - transfer of
 - non-resident insurer, by, 138(11.8)
 - not at arm’s length, 13(7)(e), 13(21.2)
 - on mutual fund rollover, 132.2(3)(c)
 - pre-1972, not at arm’s length, ITAR 20(1.3)
 - to corporation, rules, 85(1)(e), 85(5)
 - to trust, qualifying disposition, 107.4(3)(d)
 - where UCC exceeds fair market value, 13(21.2)
 - uncollectible proceeds of disposition, 20(4)–(4.2)
 - undepreciated capital cost, 13(21)
- Depreciation**, *see also* Capital cost allowance
- double, in lieu of, Reg. 1100(1)(d)
 - property acquired before 1972, ITAR 18
- Deputy Minister**, *see* Commissioner of Revenue
- Derivative**, *see also* Eligible derivative
- election for mark-to-market treatment, 10.1(1)
 - excluded from inventory writedown, 10(15), 18(1)(x)
 - no mark-to-market treatment without election, 10.1(7)
- Derivative assessment**, 160
- Derivative forward agreement**
- defined, 248(1)
 - income inclusion, 12(1)(z.7)
 - addition to ACB, 53(1)(s), (t)
 - loss deduction, 20(1)(xx)

Index

- Derivative forward agreement (*cont'd*)
- • reduction in ACB, 53(2)(w), (x)
- Designated acquired corporation**
- defined, for FAPI rules, 95(1)
- Designated amount**
- of excess FHSA contribution, defined, 207.01(1)
 - of stock option, for employer election re cash-out, 110(1.2)
 - of trust, in respect of capital gains, 104(21.2)
- Designated area**
- defined in *Canadian Wheat Board Act*, 76(5)
- Designated asset**
- defined, for oil sands mine development project, 66.1(6)
 - defined, for oil sands project, Reg. 1104(2)
- Designated beneficiary**
- defined, 210(1)
 - excluded from trust designation of Part XII.2 tax paid, 210.2(3)
 - no deduction for income of trust paid to, 104(7)
- Designated benefit**, *see* Registered retirement income fund: designated benefit
- Designated city**
- defined, Reg. 7304(1)
- Designated Class 34 income**, Reg. 1100(24) [repealed]
- Designated corporation**
- defined, for FAPI rules, 95(2)(s)
- Designated country**, *see also* Designated treaty country
- defined, Reg. 8006
- Designated donor information**
- defined, 241(10)
 - use of by RCMP or CSIS restricted, 241(9.1)
- Designated educational institution**
- defined, 118.6(1)
 - information return for tuition or scholarship, Reg. 203
 - registered educational savings plan, 146.1(1)“post-secondary educational institution”(a), 146.1(1)“trust”(d)
- Designated employee benefit**
- deductible when paid by employee life and health trust, 104(6)(a.4)
 - defined, 144.1(1)
 - excluded from employee benefit plan (EBP) benefits, 6(1)(g)(iv)
 - must be only object of ELHT, 144.1(2)(a)
 - no tax to employee on, 144.1(11)
- Designated entity**
- defined
 - • for advanced life deferred annuity information return, Reg. 216(1)
 - • for non-resident investment or pension fund, 115.2(3)(b)
- Designated financial institution**
- defined, 153(6), 160.5(1)
 - large remittances to be made at, 153(1)
 - • exception, 153(1.4)
- Designated foreign insurance business**
- defined, 138(12)
- Designated gift (for charity disbursement rules)**
- deemed not spent on charitable activities, 149.1(1.1)(a)
 - defined, 149.1(1)
 - not included in receiving charity’s income, 149.1(12)(b)(i)
 - receiving charity need not disburse, 149.1(4.1)(d), 188.1(12)
- Designated immediate expensing property**
- defined, Reg. 1104(3.1)
- Designated income**, *see* Trust (or estate): designated income, tax on
- Designated insurance property**
- defined, 138(12), 248(1)
- Designated investment services**
- defined, re non-resident investment or pension fund, 115.2(1)
- Designated liquidation and dissolution**
- defined, 95(1)
 - excluded from pregnant-loss rules, 13(21.2)(e)(iii)(E)(I)2, 14(12)(g)(i)(B) [before 2017], 18(15)(b)(iv)(A)(II), 40(3.4)(b)(v)(A)(II), 40(3.5)(c)(iii)
- Designated member**
- defined, for small business deduction, 125(7)
- Designated money purchase provision (of pension plan)**
- condition for corrective contributions, 147.1(20)
 - defined, 147.1(1)
- Designated number**
- defined, 237(1.2)
 - requirement to provide, 237(1.1)
- Designated overburden removal cost**, Reg. 1104(2), Reg. Sch. II:Cl. 12(q)
- defined, Reg. 1104(2)
- Designated partnership**
- defined, for FAPI rules, 95(2)(t)
 - defined, for non-resident surplus stripping, 212.1(3)(e)
- Designated pension plan**, *see* Designated plan
- Designated person**
- benefit conferred on through corporation, 74.4(2)
 - • exceptions, 74.4(4), 74.5(5)
 - • special rules, 74.5(6)–(8)
 - benefit conferred on through trust, 74.3(1)
 - defined
 - • for attribution rules, 74.5(5)
 - • for communication of information, 241(10)
 - • for FAPI transitional rules, 92(1.5)
- Designated person or partnership**
- defined, for foreign affiliate surplus calculations, Reg. 5907(1)
- Designated plan**, *see also* Individual pension plan
- defined, Reg. 8515(1)–(3)
 - defined, for registered pension plans, Reg. 8500(1)
- Designated pooled pension plan**
- defined, 147.5(1)
- Designated property**
- capital dividend account, re
 - • defined, 89(1)
 - • gain on excluded from calculation, 89(1)“capital dividend account”(a)(i)(C)(I), 89(1)“capital dividend account”(a)(ii)(C)(I)
 - foreign accrual property income, re
 - • defined, 95(3.1)
- Designated province**
- for carbon tax refund to farmers, 127.42(1)
- Designated provincial program**
- defined
 - • for RDSPs, 146.4(1)
 - • for RESPs, 146.1(1)
- Designated provisions**
- defined, for look-through rule for certain trusts, 259(5)
- Designated rate**
- defined, Reg. 5100(1)
- Designated region, prescribed**
- credit for investment in, 127(9)“specified percentage”(a)(ii)(B), 127(9)“specified percentage”(a)(vi), 127(9)“specified percentage”(e)(i)(B)
 - defined, Reg. 4607
- Designated savings arrangement**
- defined, Reg. 8300(1)
- Designated securities lending arrangement**
- defined, 212(20)
 - non-resident withholding tax, 212(19)

Designated shareholder

- defined, Reg. 4901(2), (2.3)

Designated stock exchange

- defined, 248(1)
- designation of by Minister of Finance, 262

Designated taxation year

- defined, Reg. 5907(1.6)

Designated taxpayer information

- defined, 241(10)
- use of by RCMP, CSIS or FINTRAC, 241(9), (9.1)

Designated treaty country

- defined, Reg. 5907(11), (11.1), (11.11)
- dividends from active income in, Reg. 5907(1)“exempt earnings”(d), “exempt loss”(c)

Designated underground storage cost

- defined, Reg. 1104(2)

Designated withdrawal

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

Designation

- to treat capital gain as forgiven amount, 80.03(7)

Designation year (re capital gains of trust)

- defined, 104(21.2)

Detaxers, 2(1) (Notes), 248(1)“person” (Notes)**Determination, see also Assessment**

- legal fees relating to, 56(1)(l), 60(o), 152(1.2)
- Minister, by
 - general anti-avoidance rule application, 152(1.11)
 - losses, of, 152(1.1)
 - binding on Minister and taxpayer, 152(1.3)
 - following GAAR assessment, 152(1.11), (1.12)
 - treated like an assessment, 152(1.2)
- notice of
 - date deemed made, 244(14), (15)
 - general anti-avoidance rule application, 152(1.11), 245(6)
 - losses, 152(1.1), 152(1.2)
 - mailing date, 244(14)
 - proof that not objected to, 244(10)
 - provisions applicable to, 152(1.2)
 - partnership income or loss, 152(1.4)–(1.8)
 - objection to, 165(1.15)
- question, of, by Tax Court, 174
- redetermination, 152(1.2)
- tax consequences under general anti-avoidance rule, 245(5)
- time, defined, 110.6(1)“qualified small business corporation share”
- value of property, by Canadian Cultural Property Export Review Board, 118.1(10)

Deuterium-enriched water

- capital cost allowance, Reg. Sch. II:Cl. 26

Development, see Canadian development expense; Scientific research and experimental development**Development phase (of oil sands project)**

- defined, Reg. 1104(2)

Developmental program for children, see Children’s Arts Tax Credit (pre-2017)**Devices**

- for hearing- or sight-impaired, business expense, 20(1)(rr)
- medical, credit for, 118.2(2), Reg. 5700

Dex Resources TCC case overruled, 66.1(6)“Canadian exploration expense”(d)(i), 66.1(9)(a)**Diabetes**

- blood-sugar level measuring device, medical expense, Reg. 5700(s)
- Type 1, qualifies for disability credit, 118.3(1.2)

Diagnostic procedures

- medical expenses, 118.2(2)(o)

Diamond

- extraction of, 248(1)“mineral resource”(d)(ii)
- qualified investments for deferred income plans, Reg. 4900(1)(n.1)

Diapers (for incontinence), medical expense, 118.2(2)(i.1)**Die, etc., capital cost allowance, Reg. Sch. II:Cl. 12(d)****Digester gas**

- defined, Reg. 1104(13)
- included in eligible waste fuel, Reg. 1104(13)“eligible waste fuel”

Digital news subscription

- credit for, 118.02(2)
- defined, 118.02(1)

Digital platform operators

- reporting rules, 282–295

Digital versatile disc, see Digital video disk (DVD)**Digital video disk (DVD)**

- rental, capital cost allowance, Reg. Sch. II:Cl. 12(r)
- excluded from half-year rule, Reg. 1100(2)C(b)(i)

Diligence, see Due diligence**Diplomat**

- Canadian, abroad
 - deemed resident in Canada, 250(1)(c), 250(2)
 - reimbursement of allowance, non-taxable, 6(1)(b)(iii)
 - foreign, in Canada
 - exemption from tax, 81(1)(a), 149(1)(a), Canada-U.S. Tax Treaty:Art. XXVIII

Direct equity percentage, defined, 95(4)**Direct financing lease**

- prescribed property for specified debt obligation definition, Reg. 9004
- prescribed security for lending-asset definition, Reg. 6209(b)(iii)

Directed donations

- prohibited, 168(1)(f)

Directed person (debt forgiveness rules)

- defined, 80(1), 80.04(1)
- eligible transferee, 80.04(2)
- obligations issued by, 80(14)

Director, Director General

- duties delegated to, 220(2.01), Reg. 900

Director (of corporation)

- fees
 - income, 6(1)(c)
 - withholding tax, 153(1)(g)
- liability of
 - for corporation’s unremitted source withholdings, 227.1
 - for offence of corporation, 242

Disability, see Mental or physical impairment**Disability assistance payment, see also Registered disability savings plan (RDSP)**

- not counted for purposes of Canada Child Benefit, 122.6“adjusted income”
- not counted for purposes of GST/HST Credit, 122.5(1)“adjusted income”
- not counted for purposes of Old Age Security clawback, 180.2(1)“adjusted income”
- tax on, 146.4(6)
- withholding tax
 - non-resident, 212(1)(r.1)
 - resident, Reg. 153(1)(i)

Disability benefit, see Disability insurance; Disability pension**Disability credit, 118.3****Disability Home Purchase Credit, 118.05, see First-Time Home Buyer’s Credit and Disability Home Purchase Credit****Disability insurance**

- benefits under, income, 6(1)(f); ITAR 19

Index

- Disability insurance (*cont'd*)
 - employer's contribution not a taxable benefit, 6(1)(a)(i)
 - top-up contributions by employer, *see* Disability policy
- Disability payments**
 - military action, for
 - exempt, 81(1)(e)
- Disability pension**
 - CPP, *see* Canada Pension Plan/Quebec Pension Plan: disability pension
 - RCMP, exempt, 81(1)(i)
- Disability policy**
 - defined, 6(17)
 - top-up payments on insolvency of insurer, 6(18)
 - reimbursement to employer, 8(1)(n.1)
- Disability-related building modifications**
 - deductible, 20(1)(qq)
 - medical expense credit, 118.2(2)(l.2)
- Disability-related devices and equipment**
 - deductible, 20(1)(rr)
- Disability-related employment benefits**
 - when not included in income, 6(16)
- Disability supports deduction**, 64
- Disability tax credit**, 118.3
- Disabled**
 - defined (for pension plan), Reg. 8500(1)
- Disabled person**, *see* Mental or physical impairment
- Disappearing source rule (interest deductibility)**, 20.1
- Disbursement excess (of charity)**
 - carried forward or back to other years, 149.1(20)
 - defined, 149.1(1)
- Disbursement quota (of charity)**
 - defined, 149.1(1)
 - Minister can make certain adjustments, 149.1(1.2)
 - Minister can reduce DQ at charity's request, 149.1(5)
 - requirement to expend DQ on charitable activities, 149.1(2)(b), (3)(b), (4)(b)
 - tax on deliberate reduction of, 188(3)–(4)
- Disclaimer, defined**, 248(9)
- Disclosure of information**
 - by CRA, *see* Communication of information (by CRA)
 - to CRA, *see* Information return
- Discontinuance of business**, *see* Ceasing to carry on business
- Discontinuance of venture capital business**
 - meaning of, 204.8(2)
 - penalty tax, 204.841
- Discount**, *see also* Bond: discount
 - defined, pre-1972 obligation, ITAR 26(12)
- Discounted bonds**, *see* Bond: discount
- Discovery well costs**
 - allowed as CEE before 2019, 66.1(6)“Canadian exploration expense”(d)(i)
- Discretion of Minister**, *see* Minister (of National Revenue)
- Discrimination**, Canada-U.S. Tax Treaty:Art. XXV
- Dishonoured cheque**, *see* Cheque: dishonoured
- Disposed share**
 - defined, for foreign affiliate liquidation and dissolution, 88(3)(d)
- Disposing affiliate**
 - defined, 88(3.1), 93(1), 95(1)“designated liquidation and dissolution”
- Disposing corporation**
 - defined, 93(1)
- Disposition**
 - capital gain, 39(1)(a), 40(1)
 - child, to, 40(1.1)
 - deceased taxpayer, of, 70(5), 164(6)
 - deemed
 - by trust, every 21 years, 104(4)
 - mark-to-market property, by financial institution, 142.5(2)
 - on becoming a financial institution, 142.6(1)(b)
 - on ceasing to be a financial institution, 142.6(1)(c)
 - on ceasing to be resident, 128.1(4)(b)
 - on death, 70(5)–(10)
 - on gift, 69(1)(b)(ii)
 - synthetic disposition arrangement, 80.6(1)
 - where spousal trust distributes property to other person, 107(4)
 - deemed contribution of capital, where, 53(1.1)
 - deferral of tax on, *see* Rollover
 - defined, 248(1)
 - satisfaction of obligation, deemed not to be, 49.1
 - depreciable, *see* Depreciable property
 - income interest in trust, 106(2)
 - involuntary, election re, 13(4)
 - deemed, 44(4)
 - land used in farming business of partnership, 101
 - life insurance policy, interest in, 248(1)“disposition”(b.1)
 - loss on, *see* Loss(es); Stop-loss rules
 - non-resident, by, 116(1)–(6)
 - certificate, 116(2)
 - notice, 116(3)
 - treaty-protected property, 116(5.01), (5.02)
 - where tax deferred under tax treaty, 115.1
 - of interest in life insurance policy, 148(9), Reg. 217(1)
 - partnership, on ceasing to exist, 98
 - personal-use
 - capital loss nil, 40(2)(g)(iii)
 - principal residence, *see* Principal residence
 - proceeds of, *see* Proceeds of disposition
 - purchaser corporation controlling or controlled by taxpayer, 40(2)(a)(ii)
 - subsequent to debt forgiveness, 80.03(2)
 - to a trust, no change in beneficial ownership, 69(1)(b)(iii)
 - together with services, allocation rule, 68
 - trust, to
 - capital loss nil, 40(2)(g)(iv)
- Dispute, taxes in**
 - whether taxpayer required to remit, 164(1.1)(d), 225.1
- Dissolution**, *see* Winding-up
- Distress preferred share**, 80.02
 - constitutes commercial obligation, 80(1)“commercial obligation”
 - constitutes excluded security, 80(1)“excluded security”
 - defined, 80(1)
 - disposition of following debt forgiveness, no deemed capital gain, 80.03(2)
 - settled
 - effect of, where subsidiary wound up into parent, 80.01(5)
 - meaning of, 80.02(2)(c), 80.02(7)(a)
 - share ceasing to be, 80.02(7)
 - substituted for debt, 80.02(3)
 - substituted for other distress preferred share, 80.02(5)
 - substitution of commercial debt obligation for, 80.02(4)
 - substitution of other share for, 80.02(6)
- Distributing corporation**
 - defined, 55(1)“distribution”
- Distribution**
 - for butterfly purposes, defined, 55(1)
 - from TFSA, defined, 146.2(1)
 - of property by non-resident trust, reporting requirement, 233.5
 - on winding-up, 84(2), (6)
 - tax, *see* Corporate distributions tax

Distribution equipment

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

Distribution tax

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

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

- defined, 128.1(7)(b)

Distribution year

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

District

- defined, Reg. 1802(5)

District energy equipment

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

District energy system, *see also* District energy equipment

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

Divestment obligation percentage

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

Dividend

- Canada Recovery (surtax on banks and life insurers for 2022), 191.5
- capital, *see* Capital dividend
- capital gains dividend
- mutual fund corporation, election, 131(1)–(1.4)
- compensation, *see* Securities lending arrangement: dividend compensation payment
- deemed, 84
 - added to cost base of share, 53(1)(b)
 - capital gains subject to income-splitting tax, 120.4(4), (5)
 - dividend stripping, 84.1(1)(b), 212.1(1.1)(a)
 - foreign affiliate dumping, 212.3(2)(a)
 - guaranteed share, on, 84(4.3)
 - income trust distribution, 104(16)
 - interest on income bond, 15(3)
 - non-resident corporation, 15(4)
 - non-resident surplus strips, 212.1, 212.2
 - on corporation becoming resident in Canada, 128.1(1)(c.1), (c.2)
 - on demutualization of insurance corporation, 139.1(2)(j)
 - on disposition of share of foreign affiliate, 93(1)
 - on distribution by mutual holding corporation, 139.2
 - partnership distribution, 96(1.11)(b)
 - redemption of share, 84(3)
 - reduction of paid-up capital, on, 84(4), (4.1)
 - SIFT trust distribution, 104(16)
 - surplus stripping, 84.1(1)(b), 212.1(1.1)(a)
 - term preferred share, on, 84(4.2), 258(2)
 - thin capitalization, 214(16), (17)
 - windup of business, 84(2)
- deemed not received, 55(2)–(5)
- deemed paid
 - deemed payable when, 84(7)
 - where not deemed received, 84(8)
- deemed proceeds of disposition of share, or capital gain, 55(2)–(5)
- deemed received where attribution rules apply, 82(2)
 - where not applicable, 84(8)
- defined, 248(1)
 - for stop-loss rules, 112(6)(a)
 - for treaty purposes, Canada-U.S. Tax Treaty:Art. X:3
 - disqualifies paying corp from CEWS, 125.7(2.01)
 - election re
 - excessive, 184(3), (3.1)–(5)
 - employees profit sharing plan, allocation by, 144(8)
 - excluded from tax under Part VI.1, 191(1)
 - exempt, on share of foreign affiliate, 93(3)
 - foreign affiliate, from, 20(13), 95(1), 113(1), Reg. 5900
 - foreign business corporation, from, received by non-resident, 213
 - gross-up, 82(1)(b)
 - guarantee agreement re
 - no deduction, 112(2.2)–(2.22)
 - in kind
 - cost of, 52(2)
 - depreciable property as, ITAR 20(1.4)
 - includes stock dividend, 248(1)
 - income, 12(1)(j), (k), 82(1), 90
 - whether specified investment business, 125(7)“specified investment business”
 - insurance corporation
 - to policyholders, 140(1)
 - life insurance policy, 148(2)
 - mortgage investment corporation, from
 - deemed bond interest, 130.1(2), (3)
 - non-resident corporation, from, 90
 - non-taxable
 - portion not included in beneficiary’s income
 - mutual fund trust, 132(3)
 - received by trust
 - designation re, 104(20)
 - ownership certificate required, 234
 - paid
 - by non-resident corporation
 - out of exempt surplus, 113(1)(a)
 - out of hybrid surplus, 113(1)(a.1)
 - out of pre-acquisition surplus, 113(1)(d)
 - out of taxable surplus, 113(1)(b), (c)
 - in excess of elective amount, tax on, 184
 - to non-resident
 - foreign business corporation, by, 213
 - tax on, 212(2)
 - United States resident, Canada-U.S. Tax Treaty:Art. X
 - patronage, *see* Patronage dividends
 - received
 - amount included in income, 82(1), 90
 - by broker/dealer, withholding tax, 153(4), (5)
 - by corporation
 - deduction from income, 112(1), (2)
 - stop-loss rules, 112(2.1)–(2.9)
 - by financial institution, 112(5)–(5.2)
 - by prescribed venture capital corporation, deemed not taxable dividend, 186.2
 - by spouse, transfer of, 82(3)
 - by trust, allocation to beneficiary, 104(19), (20)
 - gross-up, 82(1)(b)
 - Part IV tax on, 186(1)
 - late assessment of, 152(4.31)
 - triggers dividend refund to paying corporation, 129(1)
 - refund, *see* Dividend refund
 - rental arrangement, *see* Dividend rental arrangement
 - short-term preferred share, 112(2.3)
 - simultaneous, 89(3)
 - stock, *see also* 248(1)“dividend”
 - amount of, 95(7), 248(1)“amount”
 - cost of, 52(3)
 - deemed to be substituted property, 248(5)(b)
 - defined, 248(1)

Index

- Dividend** (*cont'd*)
- excluded from deemed dividend, 84(1)(a)
 - paid as benefit, 15(1.1)
 - “stop-loss” rule, 112(3), (3.1), (3.2), (4), (4.2), (4.3), (7)
 - stripping, *see* Surplus stripping
 - tax credit, 121
 - taxable
 - allocation of, by credit union, 137(5.1), (5.2)
 - amalgamation, on, 87(2)(x)
 - deduction from tax otherwise payable, 121
 - defined, 89(1)“taxable dividend”, 112(6)(a), 129(7), 248(1)
 - received by private corporation, tax on, 186
 - received by trust, designation re, 104(19)
 - taxable corporation, from
 - life insurer, received by, 138(6)
 - term preferred shares, on
 - received by specified financial institution, 112(2.1)
 - unclaimed at year-end
 - withholding tax, 153(4)
 - effect of remittance, 153(5)
- Dividend allowance**
- defined, for Part VI.1 tax, 191.1(2)
- Dividend compensation payment**, *see* Securities lending arrangement: dividend compensation payment
- Dividend-like redemption**
- Dividend payer**
- defined, for capital gains stripping rules, 55(3)(a)(iii)(A)
- Dividend received deduction**
- dividend from Canadian corporation, 112(1)
 - dividend from foreign corporation, 112(1)
- Dividend recipient**
- defined, for capital gains stripping rules, 55(3)
- Dividend refund**, *see also* Refundable dividend tax on hand
- defined, 129(1)
 - interest on, 129(2.1), (2.2)
 - mutual fund corporation, to, 131(5)
 - private corporation, to, 129
 - application to other liability, 129(2)
 - dividends deemed not to be taxable dividends, 129(1.2)
- Dividend reinvestment plan**
- whether taxable as shareholder benefit, 15(1)
- Dividend rental arrangement**, *see also* Securities lending arrangement
- defined, 248(1)
 - gross-up and credit denied, 82(1)(a)(i), 82(1)(c)
 - intercorporate dividend deduction denied, 112(2.3)
 - no deduction for dividends received under, 112(2.3)
 - share, *see* DRA share
- Dividend stripping**, *see* Surplus stripping
- Dividend tax**
- refundable, *see* Refundable dividend tax on hand
- Dividend tax credit**, 121
- Dividend time**
- defined, for foreign affiliate dumping rules, 212.3(4)
- Division of property**, *see* Partition of property
- Divisive reorganization**, 55(1), 55(3)(b)
- Divorce and separation**
- alimony, maintenance or support, *see* Support payments (spousal or child)
 - attribution rules do not apply
 - generally, 74.5(3)
 - RRSP withdrawals, 146(8.3)
 - deferred profit sharing plan rights, transfer of, 147(2)(e)(i), 147(19)
 - registered education savings plan, rights transferred, 204.91(3)
 - reimbursement of legal expenses, not taxable, 56(1)(1.1)
 - separation agreement defined, 248(1)
 - tracing of property transfer does not apply, 160(4)
 - transfer of DPSP funds to spouse’s RPP, RRSP or RRIF, 147(2)(e)(i), 147(19)
 - transfer of RPP funds to spouse’s RPP, RRSP or RRIF, 147.3(5)
 - transfer of RRIF funds to spouse’s RRSP or RRIF, 146.3(14)
 - transfer of RRSP funds to spouse’s RRSP or RRIF, 146(16)(b)
- Dock**
- capital cost allowance, Reg. Sch. II:Cl. 3
 - for mine, Reg. Sch. II:Cl. 10(l)
- Documentary evidence**
- defined, for Common Reporting Standard, 270(1)
- Documentary production**
- whether qualifies for Canadian film/video tax credit, Reg. 1106(9)
- Documentation**
- contemporaneous, for transfer pricing audit, 247(4)
- Documentation — due date**
- defined (for transfer pricing), 247(1)
- Documents**, *see also* Books and records
- demand for, 231.2(1)(b)
 - examination of, where privilege claimed, 232(3.1)–(7)
 - execution of, by corporations, 236
 - foreign-based, 143.2(13), (14), 231.6
 - proof of, 244(9), (13)
 - requirement to provide, 231.2
 - compliance order, 231.7
 - interference with CRA official, 231.5(2)
 - seized
 - copies of, 231.5
 - seizure of, 231.3(5)–(8)
 - where privilege claimed, 232(3), (4)–(7)
 - transfer pricing, 247
 - waiver of requirement to file, 220(3.1)
- Dog**, *see* Guide dog expenses; Animal
- Dollar amounts in legislation and regulations**
- functional currency to be used when election made, 261(5)(b)
 - \$0 proceeds of disposition of shares or debt when corporation goes bankrupt, 50(1)
 - \$0.27/km car operating expenses benefit for 2021, Reg. 7305.1(a)
 - \$0.28/km car operating expenses benefit for 2019–2020, Reg. 7305.1(a)
 - \$0.29/km car operating expenses benefit for 2022, Reg. 7305.1(a)
 - \$0.33/km car operating expenses benefit for 2023, Reg. 7305.1(1)
 - \$0.59 and \$0.53/km car allowances for 2019–2021, Reg. 7306
 - \$0.61 and \$0.55 per km car allowances for 2022, Reg. 7306
 - \$0.68 and \$0.62 per km car allowances for 2023, Reg. 7306
 - \$1 deemed PUC increase on stock dividend by Canadian Wheat Board, 135.2(12)
 - \$2 below which balance neither demanded nor refunded by CRA, 161.4
 - \$2 per day home office expense deduction without receipts, 8(13) [Announced Administrative Change]
 - \$3.75 per day residing in prescribed intermediate zone, deduction, 110.7(1)(b)(ii)(A), 110.7(2)
 - \$8.25 per day maintaining household in prescribed intermediate zone, 110.7(1)(b)(ii), 110.7(2)
 - \$8.25 per day extra, residing in prescribed northern zone, 110.7(1)(b)(ii)(A)
 - \$10 daily penalty for late-filed information returns, 162(7.01)(a)
 - \$10 per day penalty for trustee/receiver failing to file return, 162(3)
 - \$15 daily penalty for late-filed information returns, 162(7.01)(b)

Index

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

- \$16.50 per day maintaining household in prescribed northern zone, 110.7(1)(b)(ii)
- \$20 monthly amount for part-time student's textbook credit, 118.6(2.1)B(b)
- \$20 monthly Canada Child Benefit threshold for annual advance payment, 122.61(2)
- \$25 daily penalty for late-filed information returns, 162(7.01)(c)
- \$25 penalty for tax preparer not filing T1 return electronically, 162(7.3)(a)
- \$25 per day penalty for failing to comply with obligation, 162(7), (7.1)
- \$25 up to which interest and penalty may be cancelled, 161.3
- \$33 threshold under which Canada Workers Benefit is single payment, 122.72(2)
- \$50 above which donation returned by charity must be reported on information return, 110.1(16), 118.1(27)
- \$50 credit for U.S. social security tax changes under treaty, Canada-U.S. Tax Treaty:Art. XVIII:5
- \$50 daily penalty for late-filed information returns, 162(7.01)(d)
- \$50 maximum penalty for trustee/receiver failing to file return, 162(3)
- \$50 minimum interest to be reported by financial institution, Reg. 201(1) (Notes)
- \$50 penalty for actions re ownership certificate, 162(4)
- \$50 per day of conference expenses deemed paid for meals/entertainment, 67.1(3)
- \$50 threshold for advance payment of GST/HST Credit, 122.5(3.1)
- \$65 monthly amount for student's textbook credit, 118.6(2.1)B(a)
- \$75 daily penalty for late-filed information returns, 162(7.01)(e)
- \$75 per year maximum digital news subscription credit, 118.02(2)
- \$100 minimum fees for tuition credit, 118.5(1)(c), 118.5(1.1)
- \$100 minimum penalty for failing to comply with obligation, 162(7), (7.1)
- \$100 minimum penalty for false statement or omission, 163(2)
- \$100 minimum penalty for late-filed information returns, 162(7.01)
- \$100 minimum penalty for late renunciation, 66(12.75)
- \$100 minimum penalty for non-resident corporation failing to file return, 162(2.1)(b)(i)
- \$100 monthly penalty for late-filed election re foreign affiliate dumping, 212.3(13)
- \$100 monthly penalty for late-filed election re loan to non-resident corporate shareholder, 15(2.13)
- \$100 monthly Universal Child Care Benefit, 56(6)
- \$100 optional CCA deduction for timber limit or right to cut timber, Reg. Sch. VI:4
- \$100 penalty for failing to provide SIN or information on a form, 162(5), (6)
- \$100 penalty for paying or remitting amount over \$10,000 non-electronically, 162(7.4)
- \$100 penalty for tax preparer not filing T2 return electronically, 162(7.3)(b)
- \$100 per month penalty for late-filed elections, 85(8), 93(6), 96(6), 220(3.5)
- \$100 per partner per month penalty for failing to file partnership information return, 162(8)
- \$100 per week, certain child care expenses for child 7–15 before 2015, 63(3)“annual child care expense amount”(b)(ii), 63(3)“periodic child care expense amount”
- \$100 threshold for withholding on patronage dividends, 135(3)
- \$125 per week, certain child care expenses for child 7–15, 63(3)“annual child care expense amount”(b)(ii), 63(3)“periodic child care expense amount”
- \$140 monthly amount for part-time student's education textbook credit, 118.6(2)B(a), (2.1)B(a)
- \$150 max credit to teacher for school supplies 2016–2020, 122.9(2)
- \$170 credit to offset pension income, 118(3)
- \$200 below which tool, utensil or medical/dental instrument fully deductible before May 2/06, Reg. Sch. II:Cl. 12(c), (e), (h)
- \$200 cash allowed for fractional interest in share, 107.4(2.1)
- \$200 foreign currency gain or loss ignored for individual, 39(1.1)
- \$200 maximum charitable donations for low-rate credit, 118.1(3)
- \$200 per week, certain child care expenses for child under 7, 63(3)“annual child care expense amount”(b)(i), 63(3)“periodic child care expense amount”
- \$200 work of art deemed not depreciable property, Reg. 1102(1)(e)(i)
- \$215 per square metre hand-woven carpet deemed not depreciable property, Reg. 1102(1)(e)(ii)
- \$250 max credit to teacher for school supplies from 2021, 122.9(2)
- \$250 maximum labour-sponsored funds tax credit for 2016, 127.4(5)(a)
- \$250 maximum non-universal ancillary fee eligible for tuition credit, 118.5(3)(d), 118.5(4)(d)
- \$250 penalty for not filing information return electronically, 162(7.02)(a)
- \$250 per year earned-income accumulation for training credit, 122.91(2)(a)(i)B(A)
- \$250 super credit for first-time donor to charity until 2017, 118.1(3.1)
- \$250 teachers' exchange fund contribution deductible, 8(1)(d)
- \$275 per week, certain child care expenses for disabled child since 2015, 63(3)“annual child care expense amount”(a), 63(3)“periodic child care expense amount”
- \$300 contribution to RPP in 1944–45, income from RPP reduced, 57(4)
- \$300 (indexed) maximum monthly tax-free lodging allowance for amateur junior hockey players, 6(1)(b)(v.1)
- \$300 minimum CPP/QPP or Child Care benefits, allocated to prior year, 56(8)(b)
- \$300 per child additional COVID-19 Canada Child Benefit for 2020, 122.61(1.01)
- \$300 per month interest deduction limit for automobile for 2001–2023, 67.2, Reg. 7307(2)
- \$306 per additional dependant COVID-19 GST Credit for 2020, 122.5(3.001)A(a)
- \$375 maximum weekly disability supports deduction for student, 64(b)(ii)(B)
- \$400 maximum home office expense deduction without receipts for 2020, 8(13) [Announced Administrative Change]
- \$400 political contribution for 75% credit, 127(3)(a)
- \$450 volunteer firefighter credit, 118.06(2)
- \$465 monthly amount for education and textbook credit, 118.6(2)B(a), (2.1)B(a)
- \$483 base for calculating extra GST Credit for 2022, 122.5(3.002)A
- \$483 base for calculating extra GST Credit for Jan. 2023, 122.5(3.003)A
- \$500 below which tool, utensil or medical/dental instrument fully deductible before May 2/06, Reg. Sch. II:Cl. 12(c), (e), (h)
- \$500 Canada Housing benefit, *Rental Housing Benefit Act* s. 3
- \$500 maximum contribution to personal trust by individual before Oct. 11/02, to not trigger non-resident trust rules, 94(2)(u)(ii)(C)(II)
- \$500 maximum fine for issuing debt with interest coupons lacking “AX” or “F” marking, 240
- \$500 maximum home office expense deduction without receipts for 2021–22, 8(13) [Announced Administrative Change]
- \$500 maximum tradesperson's tools deduction before 2023, 8(1)(s)

Index

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

- \$500 minimum holding (each) of shares by non-insiders for corporation to be designated public or trust to be mutual fund trust, Reg. 4800(1)(b)(iv), 4800(2)(b)(iv), 4801, 4803(3), (4)
- \$500 minimum holding of each of 150 beneficiaries for FAPI, 95(1)“exempt trust”(b)
- \$500 minimum holding of each of 150 shareholders to not be closely held, 94(1)“closely-held corporation”(b); 94(1)“exempt foreign trust”(h)(ii)(A), 94(14)(b)(ii)(B)
- \$500 minimum penalty re tax shelter identification number, 237.1(7.4)
- \$500 non-taxable reimbursement to employee for computer or furniture for COVID-19 work at home, 6(1)(a) Notes
- \$500 penalty for charity failing to file information returns, 188.1(6)
- \$500 penalty for failing to provide Taxpayer Identification Number so CRA can share information with foreign country, 281(3)
- \$500 penalty for failure to provide Taxpayer Identification Number to financial institution for provision to foreign tax authorities, 281(3)
- \$500 penalty for not filing information return electronically, 162(7.02)(b)
- \$500 penalty for seller failing to provide Taxpayer Identification Number to platform operator, 293(3)
- \$500 per month minimum penalty for late-filed R&D non-profit corporation return, 149(7.1)A(a)
- \$500 per month penalty for failure to provide foreign-based information, 162(10)
- \$500 per month penalty for late-filed elections, 83(4), 131(1.3), 184(5)
- \$500 per week penalty for missing mandatory disclosure, 237.3(8)(a)(ii), 237.4(12)(a)(ii)
- \$500 per year maximum expense for digital news subscription credit, 118.02(2)B(a)
- \$500 tax-free gift or award to employee (CRA administrative policy), 6(1)(a) (Notes)
- \$500 threshold below which no penalty for failure to remit withholdings, 227(9.1)
- \$580 COVID-19 GST Credit for 2020, 122.5(3.001)A(a)
- \$600 minimum RRSP contribution (pension credit offset), Reg. 8301(6), 8309, 8503(4)(a)(i)(B)
- \$600 pension adjustment offset, Reg. 8300(1)“PA offset”(b)
- \$650 dental care benefit, *Dental Benefit Act* s. 9(1)(a)
- \$650 maximum moving expenses, non-taxable reimbursement to employee, *see* Notes to 6(1)(b)
- \$650 maximum political contribution credit, 127(3)(c)(i)
- \$665 monthly threshold for OAS benefits withholding, 180.2(4)(a)(ii)
- \$750 First-Time Home Buyer’s Credit until 2021, 118.05(3)
- \$750 maximum deductible health plan premium per child, 20.01(2)(c)C
- \$750 maximum labour-sponsored funds tax credit, 127.4(5)(a), Reg. 100(5)(a)
- \$750 maximum labour-sponsored funds tax credit before 2015, 127.4(5)(a), Reg. 100(5)(a)
- \$750 maximum tuition and education credits transferred, 118.81(a)A(ii)
- \$800 per month leasing cost limit for automobile for 2001–2021, 67.3, Reg. 7307(3)(b)A(v)
- \$847 maximum weekly wage covered by COVID-19 wage subsidy to July 4/20, 125.7(2)A(a)(i)(B), (ii)(C)
- \$900 per month leasing cost limit for automobile for 2022, 67.3, Reg. 7307(3)(b)A(v)
- \$918 base for calculating extra GST Credit for 2022, 122.5(3.002)A
- \$918 base for calculating extra GST Credit for Jan. 2023, 122.5(3.003)A
- \$950 per month leasing cost limit for automobile for 2023, 67.3, Reg. 7307(3)(b)A(v)
- \$1,000 antique furniture or object deemed not depreciable property, Reg. 1102(1)(e)(iv)
- \$1,000 artists’ employment expenses deductible, 8(1)(q)
- \$1,000 charitable donation limit for first-time donor super credit, 118.1(3.1)
- \$1,000 employment income eligible for Canada Employment Credit, 118(10)B(a)
- \$1,000 instalment interest threshold below which no penalty applies, 163.1(b)
- \$1,000 maximum allowable for medical expense credit air conditioner for chronic ailment, Reg. 5700(c.3)
- \$1,000 maximum exemption from income of volunteer emergency or search-and-rescue worker, 81(4)
- \$1,000 maximum expense for teacher school-supplies credit, 122.9(2)B(a)
- \$1,000 maximum refundable medical expense credit, 122.51(2)A(a)
- \$1,000 maximum tradesperson’s tools deduction starting 2023, 8(1)(s)
- \$1,000 minimum ACB and proceeds of personal-use property, 46
- \$1,000 minimum cost for electronic equipment to be optionally in separate class, Reg. 1101(5p)
- \$1,000 minimum cost for M&P property to be optionally in separate CCA class, Reg. 1101(5s)
- \$1,000 minimum fine for offence, 238(1)(a)
- \$1,000 minimum penalty for false statement by third party, 163.2(3), (5)
- \$1,000 minimum RRSP contribution (pension credit offset), Reg. 8301(6), 8309, 8503(4)(a)(i)(B)
- \$1,000 monthly threshold for quarterly source deductions remittance for new small employers, Reg. 108(1.4)(b)(i)
- \$1,000 penalty for failing to provide SR&ED claim preparer information, 162(5.1)
- \$1,000 penalty for not filing corporate return electronically, 162(7.2)
- \$1,000 per day advisor/promoter penalty for missing mandatory disclosure, 237.3(8)(b)(iii), 237.4(12)(b)(iii)
- \$1,000 per day penalty, failure by Canadian Wheat Board Farmers’ Trust to file information return, 135.2(16)
- \$1,000 per month penalty for failing to provide foreign-based information, 162(10)
- \$1,000 per year gain on farm that is principal residence, election to exempt, 40(2)(c)(ii)
- \$1,000 threshold for apprentice car mechanic tools deduction, 8(1)(r)(ii)B(B)
- \$1,000 threshold for charity penalties to be reduced by charitable transfer, 189(6.3)
- \$1,000 threshold for charity revocation tax to be reduced by charitable expenditure or transfer, 189(6.2)
- \$1,000 threshold for tradesperson’s tools deduction, 8(1)(s)
- \$1,129 maximum weekly wage covered by COVID-19 wage subsidy from July 5/20, 125.7(2)A(b)(ii)G(B)
- \$1,129 weekly remuneration cap for Canada Recovery Hiring Program, 125.7(1)“total current period remuneration”(a), “total base period remuneration”(a)
- \$1,200 standard amount for northern residents deduction, 110.7(6)“standard amount”
- \$1,275 maximum political contribution for credit, 127(3)(c)
- \$1,375 maximum 10% wage subsidy per employee for COVID-19 in 2020, Reg. 111
- \$1,500 First-Time Home Buyer’s Credit from 2022, 118.05(3)
- \$1,500 (indexed after 1988) threshold for medical expense credits for high-income taxpayers, 118.2(1)C
- \$1,500 maximum deductible health plan premium per person, 20.01(2)(c)B
- \$1,500 penalty for not filing information return electronically, 162(7.02)(c)
- \$1,500 per year of employment before 1989, additional retiring allowance transferred to RRSP, 60(j.1)(ii)(B)
- \$1,722.22 defined benefit limit before 1999, Reg. 8500(1)“defined benefit limit”(a)
- \$1,800 threshold for instalments by Quebec residents, 156.1(1)
- \$2,000 apprenticeship expenditure limit for investment tax credit, 127(9)“apprenticeship expenditure”(a)
- \$2,000 deduction from income of dining or recreational club, 149(5)(f)(i)

Index

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

- \$2,000 moving expenses for person with mobility impairment, medical expense credit, 118.2(2)(1.5)
- \$2,000 pension income, credit to offset, 118(3)
- \$2,000 per week penalty for large corp missing mandatory disclosure, 237.3(8)(a)(i), 237.4(12)(a)(i), 237.5(5)
- \$2,000 per year of employment before 1996, retiring allowance transferred to RRSP, 60(j.1)(ii)(A)
- \$2,000 pre-1986 capital loss balance deductible against any income, 111(1.1)(b)(i)
- \$2,000 RRSP overcontribution room, 204.2(1.1)(b)C
- €2,000, sales threshold for digital platform operator to be required to report, 282(1)“excluded seller”(d)
- \$2,500 maximum employee life and health benefits to key employees, 144.1(2)(e)(ii)A
- \$2,500 maximum penalty for failing to comply with obligation, 162(7), (7.1)
- \$2,500 maximum penalty for non-resident corporation failing to file return, 162(2.1)(b)(ii)
- \$2,500 maximum RESP assistance to part-time student until 2023, 146.1(2)(g.1)(ii)(B)
- \$2,500 minimum employment/business income for refundable medical expense credit, 122.51(1)“eligible individual”(c)
- \$2,500 minimum penalty for false statement in return re distribution from foreign trust, 163(2.4)(e)(i)
- \$2,500 minimum penalty for gross-negligence false statement in trust return, 163(6)
- \$2,500 penalty for not filing information return electronically, 162(7.02)(d)
- \$2,500 restricted farm loss fully deductible, 31(1)
- \$3,000 income offset by volunteer firefighter credit, 118.06(2)
- \$3,000 income offset by volunteer search-and-rescue credit, 118.07(2)
- \$3,000 maximum incorporation expenses deductible, 20(1)(b)
- \$3,000 minimum lump-sum payment for retroactive spreading over prior years, 110.2(2)
- \$3,000 monthly threshold for quarterly source deductions remittance, Reg. 108(1.12)
- \$3,000 scholarship exemption before 2006, 56(3)(b)(i)
- \$3,000 threshold for requiring individual or corporate instalments, 156.1(1), 157(2.1)
- \$3,500 deduction for refunds of past service AVCs, 60.2(1)(b)
- \$3,500 maximum employee’s RPP contribution for pre-1990 service, 147.2(4)(b), (c)
- \$3,500 per year of employment, retiring allowance transferred to RRSP, 60(j.1)(ii)
- \$4,000 child care expenses per child age 7–15 before 2015, 63(3)“annual child care expense amount”(b)(ii)
- \$4,000 maximum labour mobility deduction, 8(1)(t)
- \$4,000 maximum RESP assistance to part-time student from 2023, 146.1(2)(g.1)(ii)(B)
- \$5,000 and under non-periodic payment, withholding requirement, Reg. 103(1), (4)(a)
- \$5,000 child care expenses per child age 7–15, 63(3)“annual child care expense amount”(b)(ii)
- \$5,000 federal purchase incentive for zero-emission vehicles, Reg. 1102(26)
- \$5,000 gift to registered journalism organization, disclosure of donor, 149.1(14.1)
- \$5,000 income threshold to be deemed not financially dependent on annuitant, 146(1)“refund of premiums”
- \$5,000 maximum amount for First-Time Home Buyer’s Credit and Disability Home Purchase Credit until 2021, 118.05(3)
- \$5,000 maximum annual TFSA contribution 2009–12, 207.01(1)“TFSA dollar limit”(a)
- \$5,000 maximum cost of wheelchair-access van for medical expense credit, 118.2(2)(1.7)
- \$5,000 maximum deductible cost of maintaining old residence after moving, 62(3)(g)
- \$5,000 maximum education and tuition amounts transferred to spouse, parent or grandparent, 118.81(a)A(ii)
- \$5,000 maximum fine for communicating confidential information or SIN, 239(2.2), (2.21), (2.3)
- \$5,000 maximum gain or loss from obligation, not to be specified debt obligation, Reg. 9202(4)(c)
- \$5,000 maximum purchase for labour-sponsored funds tax credit, 127.4(5)(a), 127.4(6)(a)
- \$5,000 maximum RESP payments until 2023 until student enrolled for 13 weeks, 146.1(2)(g.1)(ii)(A)(II)
- \$5,000 maximum training amount limit for Canada Training Credit, 122.91(2)(a)(ii)
- \$5,000 maximum tuition/education amounts transferred to parent, 118.81(a)A(ii)D
- \$5,000 minimum FAPI for participating percentage calculation, 95(1)“participating percentage”
- \$5,000 penalty for using or possessing zipper software or hardware, 163.3(2)(a), (3)(a)
- \$5,000 threshold for withholding rate on RDSP disability assistance payment, Reg. 103.1(2)C(a), (b)
- \$5,000 transfer to outside organization above which charity must disclose on public information return, Reg. 3703
- \$5,400 annual Canada Child Benefit for child age 6–17, 122.61(1)A:E(b)
- \$5,500 maximum annual TFSA contribution 2013–14 and 2016–18, 207.01(1)“TFSA dollar limit”(b), (d)
- \$6,000 maximum annual TFSA contribution 2019–21, 207.01(1)“TFSA dollar limit”(d)
- \$6,400 annual Canada Child Benefit for child under 6, 122.61(1)A:E(a)
- \$8,000 child care expenses per child under 7, 63(3)“annual child care expense amount”(b)(i)
- \$8,000 limitation on RPP past service benefits, Reg. 8307(2)(b)
- \$8,000 maximum carryforward for first home savings account, 146.6(1)“annual FHSA limit”(b) formula, (b)F(ii)(B), 146.6(1)“FHSA carryforward”(a)
- \$8,000 maximum penalty for late-filed elections, 85(8), 93(6), 96(6), 220(3.5)
- \$8,000 maximum RESP payments from 2023 until student enrolled for 13 weeks, 146.1(2)(g.1)(ii)(A)(II)
- \$8,000 RRSP overcontribution room, 204.2(1.1)(b)M
- \$8,750 maximum restricted farm loss deduction before 2013, 31(1)(a)(ii)
- \$10,000 above which payment to CRA must be electronic, 160.5(2)
- \$10,000 employment income of Canadian resident from U.S. or U.S. resident from Canada not taxable, Canada-U.S. Tax Treaty:Art. XV:2(a)
- \$10,000 external income threshold for deduction of private health plan premiums, 20.01(1)(a)(ii)
- \$10,000 international electronic funds transfer must be reported to CRA, 237.3 [end]
- \$10,000 limit for attendant care credit for disabled person, 118.2(2)(b.1)
- \$10,000 limit to clergy residence deduction, 8(1)(c)(iv)(A)(I)
- \$10,000 max expenditures per location for air quality improvement credit, 127.43(1)“total per location expense”(b)
- \$10,000 maximum amount for First-Time Home Buyer’s Credit and Disability Home Purchase Credit from 2022, 118.05(3)
- \$10,000 maximum annual TFSA contribution for 2015, 207.01(1)“TFSA dollar limit”(c)
- \$10,000 maximum expenses for home accessibility tax credit until 2021, 118.041(3)B(a)
- \$10,000 maximum income of non-resident (NR) employee in Canada not needing information return by NR employer, Reg. 200(1.1)
- \$10,000 maximum RRSP withdrawal per year for Lifelong Learning Plan, 146.02(1)“eligible amount”(c), Reg. 104.1(1)(c)
- \$10,000 minimum advisor/promoter penalty for missing mandatory disclosure, 237.3(8)(b)(ii), 237.4(12)(b)(ii)
- \$10,000 minimum fine on summary conviction for using, possessing, making or selling zipper software or hardware, 239.1(2)
- \$10,000 over which capital addition to building owned since 1971 by credit union deemed separate building, ITAR 58(1)(c)(i)

Index

- Dollar amounts in legislation and regulations (*cont'd*)
- \$10,000 penalty for making or selling zipper software or hardware, 163.3(4)(a)
 - \$10,000 per new child care space for investment tax credit, 127(9)“child care space amount”(a)
 - \$10,000 per year minimum income to qualify for training credit, 122.91(2)(a)(i)B(A)(III)
 - \$10,000 revenue over which non-profit organization must file information return, 149(12)
 - \$10,000 tax-free payment by employer to spouse on death, 248(1)“death benefit”
 - \$10,000 threshold for recoverable contribution to non-resident trust, 94(7)(a)(II)(A), 94(7)(b)
 - \$10,000 threshold for reporting electronic funds transfers, 244.2(1), 244.4(1)
 - \$10,000 threshold for specified disability savings plan, 146.4(1.2)(b)
 - \$10,000 value of individual asset required to be reported on emigration, 128.1(10)“reportable property”(d)
 - \$11,000 child care expenses for disabled child, 63(3)“annual child care expense amount”(a)
 - \$11,500 denominator for reduced small business deduction for large corp before 2022–23, 125(5.1)(a)
 - \$12,000 maximum federal tax at issue for Tax Court of Canada informal procedure before June 26/13, *Tax Court of Canada Act* s. 18(1)(a)
 - \$12,000 maximum penalty for failure to provide foreign-based information, 162(10)
 - \$14,500 exemption from security required for departure tax, 220(4.51)
 - \$15,000 athlete/entertainer income of Canadian resident from U.S. or U.S. resident from Canada not taxable, Canada-U.S. Tax Treaty:Art. XVI:1
 - \$15,000 basis for additional CCA for grain-drying machinery, Reg. 1100(1)(sb)(iv)(B)
 - \$15,000 cutoff for lump sum payment, withholding requirements, Reg. 103(4)(b), (c)
 - \$15,000 exempt reimbursement for housing loss on relocation, 6(20)(a)
 - \$15,000 maximum annual disability supports deduction for student, 64(b)(ii)(A)
 - \$15,000 maximum contributions to eligible funeral arrangement for funeral services, 148.1(1)“eligible funeral arrangement”(b)(i)
 - \$15,000 maximum late filing penalty, 66(12.75)
 - \$15,000 threshold for withholding rate on RDSP disability assistance payment, Reg. 103.1(2)C(b), (c)
 - \$15,500 pension adjustment limitation, Reg. 8509(12)(a)(ii)
 - \$17,500 maximum restricted farm loss deduction, 31(1)(a)(ii)
 - \$20,000 automobile cost cap (purchased June 18/87–Aug. 31/89), 13(2), 13(7)(g), (h), 20(4), (16.1), 67.2–67.4, 85(1)(e.4), Reg. 1101(1af), Reg. Sch. II:Cl. 10.1
 - \$20,000 limit in year of death for attendant care credit for disabled person, 118.2(2)(b.1)
 - \$20,000 maximum contributions to eligible funeral arrangement for cemetery care, 148.1(1)“eligible funeral arrangement”(b)(ii)
 - \$20,000 maximum expenses for home accessibility tax credit from 2022, 118.041(3)B(a)
 - \$20,000 maximum RRSP withdrawal for Home Buyers’ Plan before 2009, 146.01(1)“regular eligible amount”(h), 146.01(1)“supplemental eligible amount”(g)
 - \$20,000 maximum RRSP withdrawal for Lifelong Learning Plan, 146.02(1)“eligible amount”(d), Reg. 104.1(1)(d)
 - \$23,529 maximum base for leasing costs of automobile (before indexing), 67.3(d)
 - \$24,000 basic annual ITC limit for individuals, 127(9)“annual investment tax credit limit”
 - \$24,000 maximum loss at issue for Tax Court of Canada informal procedure before June 26/13, *Tax Court of Canada Act* s. 18(1)(b)
 - \$24,000 maximum penalty for failure to provide foreign-based information after demand, 162(10)
 - \$24,000 minimum penalty for false statement in returns re transactions with non-residents and foreign properties, 163(2.4)
 - \$24,000 per partner maximum penalty for failing to file partnership information return, 162(8)
 - \$25,000 below which arm’s length investment in small business permitted by RRSP, Reg. 4901(2)“connected shareholder”
 - \$25,000 below which leasing property rules do not apply, Reg. 1100(1.11)(c), 1100(1.13)(c), 1100(1.14), 8200(b)
 - \$25,000 charity false-statement penalty threshold for mandatory suspension of receipting privilege, 188.2(1)(c)
 - \$25,000 home relocation loan, interest deduction equivalent to before 2018, 110(1)(j)
 - \$25,000 maximum 10% wage subsidy for COVID-19 in 2020, Reg. 111
 - \$25,000 maximum federal tax at issue for Tax Court of Canada informal procedure, *Tax Court of Canada Act* s. 18(1)(a)
 - \$25,000 maximum fine for offence, 238(1)(a)
 - \$25,000 maximum investment in small business by specified shareholder’s RRSP, Reg. 4901(2)“designated shareholder”(a)
 - \$25,000 maximum RRSP withdrawal for Home Buyers’ Plan before March 20/19, 146.01(1)“regular eligible amount”(h), 146.01(1)“supplemental eligible amount”(g)
 - \$25,000 minimum farming expenses to qualify for carbon tax refund, 127.42(1)“eligible farming expenses”A(a)
 - \$25,000 minimum investment assets for charitable foundation disbursement requirement, 149.1(1)“disbursement quota”B(a)(ii)
 - \$25,000 minimum property value for interest deduction restrictions, 18.2(1)“excluded lease”(c)(i)
 - \$25,000 monthly employer withholdings, remittance dates, Reg. 108(1.1)(a)
 - \$25,000 penalty cap for missing mandatory disclosure, 237.3(8)(a)(ii)(A), 237.4(12)(a)(ii)(A)
 - \$25,000 value for total assets required to be reported on emigration, 128.1(9)
 - \$30,000 automobile cost cap for 2001–2021, 13(2), 13(7)(g), (h), 20(4), (16.1), 67.2–67.4, 85(1)(e.4), Reg. 1101(1af), 7307(1), Reg. Sch. II:Cl. 10.1
 - \$30,000 threshold for phase-out of Canada Child Benefit, 122.61(1)A:Q(a)
 - \$34,000 automobile cost cap for 2022, 13(2), 13(7)(g), (h), 20(4), (16.1), 67.2–67.4, 85(1)(e.4), Reg. 1101(1af), 7307(1), Reg. Sch. II:Cl. 10.1
 - \$35,000 maximum contributions to eligible funeral arrangement, 148.1(1)“eligible funeral arrangement”(b)(iii)
 - \$35,000 maximum RRSP withdrawal for Home Buyers’ Plan after March 19/19, 146.01(1)“regular eligible amount”(h), 146.01(1)“supplemental eligible amount”(g)
 - \$35,294 maximum base for leasing costs of automobile 2001–21, 67.3(d)
 - \$36,000 automobile cost cap for 2023, 13(2), 13(7)(g), (h), 20(4), (16.1), 67.2–67.4, 85(1)(e.4), Reg. 1101(1af), 7307(1), Reg. Sch. II:Cl. 10.1
 - \$40,000 basic exemption from minimum tax, 127.53
 - \$40,000 FHSA lifetime contribution limit, 146.6(4)(b), 207.01(1)“excess FHSA amount”(c)A
 - \$40,000 income threshold for debt forgiveness reserve, 61.2:C
 - \$50,000 cost of building, separate CCA class for, Reg. 1101(1ac), (1ad), (5b)
 - \$50,000 financial institution account threshold for reporting for US FATCA, Canada-US ETIEA Annex I:II(A), III(A)
 - \$50,000 max expenditures for air quality improvement credit, 127.43(1)“total ventilation expense”(b)
 - \$50,000 maximum accumulated income payment from RESP, no withholding, Reg. 100(1)“remuneration”(n)(iii)
 - \$50,000 maximum assets, trust not required to file return if no income, 150(1.2)(b)
 - \$50,000 maximum loss at issue for Tax Court of Canada informal procedure, *Tax Court of Canada Act* s. 18(1)(b)
 - \$50,000 maximum qualifying expenditures for Multigenerational Home Renovation Tax Credit, 122.92(3)B(a)

Index

- Dollar amounts in legislation and regulations (*cont'd*)
- \$50,000 maximum RESP contributions per beneficiary, 204.9(1)“excess amount”(b), 204.9(1)“RESP lifetime limit”(c)
 - \$50,000 minimum fine on indictment for using, possessing, making or selling zipper software or hardware, 239.1(3)
 - \$50,000 monthly employer withholdings, requirement to remit through financial institution or early, 153(1) closing words, 153(1.4), Reg. 110
 - \$50,000 penalty for second infraction using or possessing zipper software or hardware, 163.3(2)(b), (3)(b), (4)(b)
 - \$50,000 top-bracket income exemption for security required for departure tax, 220(4.51)(a)
 - \$50,000 USD thresholds for certain reporting of non-residents’ accounts, 270(1)“broad participation retirement fund”(c)(iv)(B), 270(1)“excluded account”(a)(v), (b)(iv), (f)(ii), 270(1)“qualified credit card issuer”(b); Canada-US ETIEA Annex I, II(A)(1), II(A)(4), III(A)(1)
 - \$55,000 per year maximum salary per employee for journalism labour credit, 125.6(1)“qualifying labour expenditure”(a)
 - \$55,000 zero-emission automobile cost cap, 13(7)(i), Reg. 7307(1.1)
 - \$65,000 threshold for slower phase-out of Canada Child Benefit, 122.61(1)A:Q(a)
 - \$75,000 rent expense limit for COVID-19 Canada Emergency Rent Subsidy, 125.7(1)“qualifying rent expense”A
 - \$90,000 denominator for reduced small business deduction for large corp starting 2022–23, 125(5.1)(a)
 - \$100,000 capital gain exempt from security required for departure tax, 220(4.51)(a)
 - \$100,000 capital gains exemption, 110.6(3)
 - \$100,000 foreign assets, reporting requirement, 233.3(1)“reporting entity”
 - \$100,000 maximum cost of addition to pre-1979 building, Reg. Sch. II:Cl. 6(k)
 - \$100,000 minimum cost for accredited film/video production episode under 30 minutes, Reg. 9300(1)(b)(i)
 - \$100,000 minimum investment assets for charitable organization disbursement requirement, 149.1(1)“disbursement quota”B(a)(i)
 - \$100,000 minimum penalty for s. 160 avoidance planning, 160.01(2)(b)
 - \$100,000 monthly employer withholdings, remittance dates, Reg. 108(1.1)(a)
 - \$100,000 of shares is material for private foundation, 149.1(1)“material transaction”(a), 149.2(1)(a)(ii)
 - \$100,000 or more cost of automobile or airplane, *see* Luxury Items Tax
 - \$100,000 penalty cap for large corp missing mandatory disclosure, 237.3(8)(a)(i)(A), (b)(iii), 237.4(12)(a)(i)(A), (b)(iii), 237.5(5)
 - \$100,000 penalty for second infraction making or selling zipper software or hardware, 163.3(4)(c)
 - \$100,000 plus gross compensation, maximum civil penalty, 163.2(5)(b)(ii)
 - \$150,000 limit for advanced life deferred annuity for 2020, 205(1)“ALDA dollar limit”
 - \$200,000 active business income limit for small manufacturers’ M&P calculation, Reg. 5201(b)
 - \$200,000 assets over which non-profit organization must file information return, 149(12)
 - \$200,000 limit to non-CCPC stock option grants, 110(1.31)A
 - \$200,000 maximum taxable income for extra R&D credit, 127(9)“super-allowance benefit amount”C(b)(ii)
 - \$200,000 minimum cost for accredited film/video production episode at least 30 minutes, Reg. 9300(1)(b)(ii)
 - \$250,000 or more cost of boat, *see* Luxury Items Tax
 - \$250,000 USD threshold for reporting pre-existing non-residents’ accounts, 275
 - \$300,000 rent expense limit for COVID-19 Canada Emergency Rent Subsidy Sept. 27/20 to Oct. 23/21, 125.7(2.1)A:D(b)E.1(i)
 - \$400,000 taxable income threshold for small CCPC quarterly instalments, 157(1.2)(a)
 - \$500,000 capital gains deduction for farming/fishing property, 110.6(2.2)(a)
 - \$500,000 dividend allowance for Part VI.1 tax (preferred share dividends), 191.1(2)(a), 191.1(4)(a)
 - \$500,000 exemption from earnings subject to branch tax, Canada–U.S. tax treaty Canada–U.S. Tax Treaty:Art. X:6(d)
 - \$500,000 income limit for enhanced R&D investment tax credit, 127(10.2)
 - \$500,000 maximum consideration received by non-resident trust before certain rules apply, 94(2)(s)(vi)(C)
 - \$500,000 maximum cost of addition to pre-1988 building, Reg. Sch. II:Cl. 3(k)(iv)
 - \$500,000 maximum fine on summary conviction for using, possessing, making or selling zipper software or hardware, 239.1(2)
 - \$500,000 small business deduction threshold, 125(2)–(4), 125(7)“specified partnership income”M(i)
 - \$500,000 threshold amount of annual sales affecting GST input tax credit timing, 248(16)(a)(i)(B)(I), 248(16)(a)(ii)(B)
 - \$500,000 threshold amount of annual sales affecting QST input tax refund, 248(16.1)(a)(i)(B)(I), 248(16)(a)(ii)(B)
 - \$1,000,000 base level deduction for principal-business corporation, 18(2.2)–(2.4)
 - \$1,000,000 Canadian development expenses renounced to flow-through shareholder as Canadian exploration expenses before 2019, 66(12.602)(c)
 - \$1,000,000 capital gains exemption for farming/fishing property, 110.6(2.2)(a)
 - \$1,000,000 financial institution account threshold for reporting for US FATCA, Canada-US ETIEA Annex I:II(B), IV(B)
 - \$1,000,000 maximum fine on indictment for using, possessing, making or selling zipper software or hardware, 239.1(3)
 - \$1,000,000 maximum penalty for not publishing CCUS climate risk disclosure report, 211.93(3)
 - \$1,000,000 minimum cost for accredited film/video production, Reg. 9300(1)(a)
 - \$1,000,000 minimum interest and financing expenses for interest deduction restrictions, 18.2(1)“excluded entity”(b)
 - \$1,000,000 minimum stock buyback to trigger Part II.2 tax, 183.3(4)
 - \$1,000,000 over which office and computer equipment is not “exempt property”, Reg. 1100(1.13)(a)(i), (i.1)
 - \$1,000,000 previous year’s dividends paid on taxable preferred shares reduces dividend allowance, 191.1(2)(b), 191.1(4)(b)
 - \$1,000,000 rent expense limit for COVID-19 Canada Emergency Rent Subsidy Oct. 24/21 to May 7/22, 125.7(2.1)A:D(b)E.1(ii)
 - \$1,000,000 threshold of transactions with related non-residents for reporting requirements, 233.1(4)
 - \$1,000,000 USD maximum annual lifetime contributions to retirement fund (re reporting of non-residents’ accounts), 270(1)“excluded account”(a)(v)
 - \$1,000,000 USD threshold for certain reporting of non-residents’ accounts, 270(1)“high value account”, “lower value account”, 275(4)(b)(iii)(A), 277(6)(c)
 - \$1,050,000 maximum fully refundable R&D investment tax credit since Feb. 26/08, 127(10.2)
 - \$1,500,000 limit for CCA immediate expensing 2021–2024, Reg. 1104(3.2)
 - \$2,000,000 expenditure limit for higher investment tax credit before Feb. 26/08, 127(10.2)–(10.4)
 - \$2,000,000 penalty for not filing CCUS knowledge-sharing report, 211.92(4)
 - \$3,000,000 expenditure limit for higher investment tax credit, 127(10.2)–(10.4)
 - \$5,000,000 expected drilling expenses for well, 66.1(6)“Canadian exploration expense”(d)(iv)(A)
 - \$5,000,000 gross revenue threshold for calculating transfer pricing penalty, 247(3)(b)(ii)
 - \$5,000,000 maximum cost of segregated fund, exclusion from financial institution rules, Reg. 9000(c)(iii)
 - \$5,000,000 minimum foreign affiliates value or shares cost for interest deduction restrictions, 18.2(1)“excluded entity”(c)(ii)

Index

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

- \$10,000,000 capital deduction for large corporations for certain purposes, 181.5(1.1), (4.1)
 - \$10,000,000 cost of pipeline, election for separate class, Reg. 1101(5i)
 - \$10,000,000 excess value for CWB trust, 135.2(1)“Canadian Wheat Board continuance”(c), 135.2(1)“eligible unit”(a)
 - \$10,000,000 maximum investment in corporation to be “small business security” for qualified investments, Reg. 5100(2)(e)
 - \$10,000,000 minimum outstanding bonds for corporate bonds to be qualified investments, Reg. 4900(1)(i)(iii)
 - \$10,000,000 taxable capital employed in Canada, 225.1(8)
 - \$10,000,000 taxable capital employed in Canada to be large corporation, 225.1(8)
 - \$10,000,000 taxable capital in Canada threshold for reduced small business deduction, 125(5.1)(a)
 - \$10,000,000 taxable capital phase-out start for enhanced R&D investment tax credit, 127(10.2)
 - \$10,000,000 taxable capital threshold for small CCPC quarterly instalments, 157(1.2)(a)
 - \$15,000,000 maximum investment for one corporation by LSVCC, 204.8(1)“eligible investment”(e)
 - \$15,000,000 maximum taxable capital employed in Canada for corp to qualify for air quality improvement credit, 127.43(1)“qualifying corporation”(b)
 - \$15,000,000 maximum taxable capital of corp that renounces CDE to flow-through shareholder as CEE before 2019, 66(12.601)(a.1)
 - \$15,000,000 taxable capital threshold for eliminating small business deduction before 2022–23, 125(5.1)(a) [\$5,000,000 × 0.00225 = \$11,250]
 - \$20,000,000 ownership interest threshold for CCUS climate risk disclosure, 211.93(1)“exempt corporation”
 - \$25,000,000 debt issuance to qualify for RRSP etc. investment, 204“qualified investment”(c.1)(ii)
 - \$25,000,000 minimum corporate capital for bonds to be qualified investments, Reg. 4900(1)(i)(iii)
 - \$50,000,000 asset limit for corporation to be “small business security” for qualified investments, Reg. 5100(2)(f)
 - \$50,000,000 asset limit for eligible business entity for LSVCC, 204.8(1)“eligible investment”(f)(i)
 - \$50,000,000 asset limit for qualified small business corporation (share not mark-to-market property), Reg. 9001(1)(c)
 - \$50,000,000 corporate assets threshold for high penalties for missing mandatory disclosure, 237.3(8)(a)(i), 237.4(12)(a)(i)
 - \$50,000,000 maximum carrying value of small business corporation for capital gain rollover, 44.1(1)“eligible small business corporation share”(b)
 - \$50,000,000 minimum taxable capital for interest deduction restrictions, 18.2(1)“excluded entity”(a)
 - \$50,000,000 taxable capital phase-out limit for enhanced R&D investment tax credit since Feb. 26/08, 127(10.2)
 - \$50,000,000 taxable capital threshold for eliminating small business deduction starting 2022–23, 125(5.1)(a) [\$40,000,000 × 0.00225 = \$90,000]
 - \$100,000,000 deduction for annual 1.5% surtax on banks and life insurers, 123.6(2)B(a)(ii)
 - \$200,000,000 basic capital deduction for financial institutions capital tax, 190.15
 - \$220,000,000 maximum capital deduction for financial institutions capital tax, 190.15
 - \$250,000,000 CCUS expenses threshold, 211.92(1)“knowledge sharing CCUS project”
 - \$500,000,000 minimum revenue for stock option limit rules to apply, 110(0.1)“specified person”(b), (c)
 - €750,000,000 (Euros), threshold for country-by-country reporting, 233.8(1)“excluded MNE group”
 - \$1,000,000,000 annual value of shares traded for exchange (re reporting of non-residents’ accounts), 270(1)“established securities market”(b)
 - \$1,000,000,000 capital deduction for Part VI tax, 190.15(1)–(3)
 - \$1,000,000,000 deduction for 2022 15% surtax on banks and life insurers, 190.15(1)–(3)
 - \$2,000,000,000 equity for offshore regulated banks FAPI exception, 95(2.11)(b)(i)
- Domicile**, *see* Residence
- Donations**, *see* Gifts and donations (charitable); Gratuities
- Donor bank**
- sperm costs, medical expense credit, 118.2(2)(v)
- Double counting of deductions or credits**, 248(28)
- Double dipping allowed**
- home accessibility tax credit and medical expense credit, 118.041(4)
 - donation credit and tax-free capital gain, 38(a.1), (a.2), 39(1)(a)(i.1)
- Double jeopardy**, 238(3), 239(3)
- Double tax, elimination of**
- generally, 248(28)
 - imposed by both Canada and foreign country
 - foreign tax credit, 126
 - treaty relief, Canada–U.S. Tax Treaty:Art. XXIV; Canada–U.K. Tax Treaty:Art. 21
- Doubtful debts**
- reserve for, 12(1)(d), (l)
- Dow Jones Industrial Average units**
- qualified investments for deferred income plans, Reg. 4900(1)(n.1)
- Downsizing**, Reg. 8505
- pension benefits, Reg. 8308(9)
 - program, defined, Reg. 8505(1)
 - suspension or cessation of pension, Reg. 8503(8)
- Dragon Dictate software**
- disability supports deduction, 64(a)A(ii)(G)
 - medical expense credit, 118.2(2)(l.42)
- Dramatic work, copyright royalties**
- no withholding tax, 212(1)(b)(vi), 212(9)(b)
- Dressing oneself**
- defined, 118.4(1)(f)
 - impairment with respect to
 - certification by occupational therapist or physician
 - for disability credit, 118.3(1)(a.2)(iv)
 - eligibility for disability credit, 118.4(1)(c)(ii.1)
- Drilling or exploration expense**
- defined, 66(15)
- Drilling rights**, *see* Exploration and drilling rights
- Drinks**, *see* Food
- Drive-in theatre, property acquired for**
- capital cost allowance, Reg. Sch. II:Cl. 10(q)
- Driver’s licence**
- change of address, deduction for, 62(3)(h)
- Driveway alterations**
- medical expense credit, 118.2(2)(l.6)
- Drought or flood region**
- prescribed regions, Reg. 7305.01(1)
 - sales of breeding bees in
 - deferral of income from, 80.3(4.1)
 - sales of breeding livestock in
 - deferral of income from, 80.3(4)
 - exceptions, 80.3(6)
 - inclusion of deferred amount, 80.3(5)
 - amalgamation, on, 87(2)(tt)
- Drug plan**, *see* Private health services plan
- Drugs**
- charitable donation from inventory, additional deduction before 2017, 110.1(1)(a.1), (8)
 - medical expense credit, 118.2(2)(n), (s), Reg. 5701
 - behind-the-counter drugs, Reg. 5701
 - Special Access Programme, 118.2(2)(s)
- Due dates**, *see* Deadlines

Due diligence

- defence to directors' liability, 227.1(3)
- defence to foreign reporting requirements, 233.5
- defence to notifiable-transaction penalty, 237.4(17)
- defence to reportable-transaction penalty, 237.3(11)
- defence to SR&ED claim-preparer penalty, 162(5.2)
- defence to uncertain-tax-treatments penalty, 237.5(6)
- defence to zipper-software penalty, 163.3(8)
- obligation on financial institution re accounts to be reported to foreign tax authorities, 272–277
- obligation on financial institution re accounts to be reported to US Internal Revenue Service, 265(2), (3)
- required from PRPP administrator, 147.5(9)
- required from RRSF, RRIF, TFSA, RESP or RDSP issuer, carrier or promoter, 207.01(5)

Dues

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

Dumping, *see* Anti-dumping duties or countervailing duties; Foreign affiliate dumping

Durable goods, for teacher school-supplies credit, Reg. 9600

Duties

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

Duty-free stores relief (COVID), Reg. 8901.1(2)(b)(xiii), *see also* Qualifying tourism or hospitality entity

Dwelling, *see* Home

E

EBITDA [Earnings before interest, taxes, depreciation and amortization], *see* Excessive interest and financing expenses limitation (EIFEL)

EBP, *see* Employee benefit plan

EBRD, *see* European Bank for Reconstruction and Development

ECE, *see* Eligible capital expenditure

ECP, *see* Eligible capital property (pre-2017)

ECRA, *see* Executive compensation repayment amount

EEDD, *see* Excessive eligible dividend designation

EFA, *see* Eligible funeral arrangement; Excess FHSA amount

EFILE, *see* Electronic filing

EFT, *see* Exempt foreign trust

EGE, *see* Eligible group entity

EHLT, *see* Employee life and health trust

EI, *see* Employment insurance

EIFE, *see* Exempt interest and financing expenses

EIFEL, *see* Excessive interest and financing expenses limitation (EIFEL)

ELHT, *see* Employee life and health trust

EMDP, *see* Eligible mine development property

EOSMDE, *see* Eligible oil sands mine development expense

EOT, *see* Employee ownership trust

EPOP, *see* Eligible person or partnership

ERDTH, *see* Eligible refundable dividend tax on hand

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

ETF, *see* Exchange-traded fund

Earned depletion allowances

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

Earned depletion base

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

Earned income

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

Earnings (of foreign affiliate)

- defined, Reg. 5907(1)

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

Earnout agreement

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

Earthquake reserves

- insurers, Reg. 1400(3)L

Easement

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

eBay

- reporting of sales by sellers, 282–295

Ecological gifts

- by corporation, 110.1(1)(d)
- by individual, 118.1(1)“total ecological gifts”
- determination of value by Minister of Environment, 118.1(10.1)–(10.5)
 - • appeal to Tax Court of Canada, 169(1.1)
 - • reassessment, 118.1(11)
- easement, servitude or covenant, valuation, 110.1(5), 118.1(12)
 - • valuation applies for capital gains purposes, 43(2)
- fair market value, certificate of, 118.1(10.5)
- reduced capital gain inclusion, 38(a.2)
- tax if donee disposes of the property, 207.31

Ecologically sensitive land, *see* Ecological gifts

Economic profit

- defined, for foreign tax credit, 126(7)
- none, limitation on foreign tax credit, 126(4.1)

Economic substance, relevant for GAAR, 245(4.1)

Economic zone, *see* Exclusive economic zone

Economically relevant characteristics

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

Edition (of periodical)

- meaning of, 19.01(6)

Education assistance

- provided by employer to employee's relative, whether taxable, 6(1)(a)(vi)

Education credit (pre-2017), 118.6, *see also* Lifelong Learning Plan; Student loan; Tuition fees: credit for

Education expense reimbursement for ill and injured

- paid to Canadian Forces member or veteran, exempt, 81(1)(d.1)(viii)

Education savings plan, 146.1, *see also* Registered education savings plan

- appeal from refusal to register, 172(3)(e), 180
 - • conditions, 146.1(2)
- defined, 146.1(1)“education savings plan”
- payment out of
 - • registered plan, 56(1)(q), 146.1(7)
- registration of, 146.1(2), (4)
 - • conditions, 146.1(2)
 - • deemed, 146.1(3)
 - • refusal by Minister
 - • • deemed, 172(4)(d)

Educational assistance payment

- defined, 146.1(1)
- from registered plan, taxable, 56(1)(q), 146.1(7)

Index

- Educational assistance payment (*cont'd*)
- limitations on, 146.1(2)(g), (g.1)
 - payable until 6 months after student ceases to be enrolled, 146.1(2.21), (2.22)
- Educational institution**
- certification by Human Resources Development Canada, 118.5(1)(a)(ii), 118.6(1)“designated educational institution”(a)(ii)
 - designated, defined, 118.6(1)
 - required to issue tuition fees certificate, Reg. 203
- Educational program**
- qualifying, defined, 118.6(1)
- Educators’ credit**, *see* Teacher school-supplies credit
- Egypt**, *see also* Foreign government; Little Egypt bump
- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(d) [repealed]
- Elected functional currency**
- defined, for functional currency rules, 261(1)
- Elected property**
- defined, for CCA separate-class rules for licences, Reg. 1101(1ag)
- Electing beneficiary (for qualified disability trust)**
- defined, 122(3)
- Electing contributor (to trust)**
- defined, 94(1)
 - election to limit liability for non-resident trust’s tax, 94(16)
 - liability for joint contribution to trust, 94(17)
- Electing trust (for non-resident trust rules)**
- defined, 94(1)
 - rules for, 94(3)(f)
- Election**, *see also* Rollover
- amounts receivable at date of death, 70(2)
 - • revocation of, 70(4)
 - assets acquired from foreign affiliate, 80.1(4)–(6)
 - basic herd, reduction of, 29(1)
 - beneficiary, by, re single payment from DPSP, Reg. 1503
 - beneficiary of non-resident trust, by, 107(2.002)
 - branch tax, Reg. 2403
 - CCPC, not to be for purposes of dividend tax credit, 125(7)“Canadian-controlled private corporation”(d)
 - Canadian development expenses of partnership, exclusion of, 66.2(5)“Canadian development expense”(f)
 - Canadian oil and gas property expenses of partnership, exclusion of, 66.4(5)“Canadian oil and gas property expense”(b)
 - capital cost allowance
 - • inclusions, Reg. 1103
 - • separate class for certain equipment, Reg. 1101(5q), (5t)
 - • transfers between classes, Reg. 1103
 - capital dividend, re, 83(2)–(4)
 - • excessive, tax on, 184
 - capital gains dividend, re
 - • investment corporation, 131(1), Reg. 2104
 - • mortgage investment corporation, 130.1(4), Reg. 2104.1
 - • • excessive, tax on, 184
 - • mutual fund corporation, 131(1), Reg. 2104
 - • • excessive, tax on, 184
 - capital gains exemption
 - • farm or fishing property, 110.6(2)
 - • gains to Feb. 22/94, 110.6(3), (19)–(30), *see also* Capital gains deduction: election to trigger gain
 - • small business shares, 110.6(2.1)
 - • when corporation going public, 48.1
 - capital interest distribution by personal trust or prescribed trust, 107(2)
 - capitalization of interest, 21
 - carryback or carryforward, *see* Carryback; Carryforward
 - cash method (farming or fishing business), 28(1)
 - ceasing to be resident, on, 128.1(4)(d), Reg. 1300–1302
 - • on returning to Canada, 128.1(6)(a), (c), 128.1(7)(d), (g)
 - • postponement of departure tax by posting security, 220(4.5)–(4.54)
 - change in use of property, 45(2)
 - communal organization, re taxable income, 143(2), (3)
 - corporation and partners re property transferred, 85(1), (2)
 - corporation and shareholder, re property transferred
 - • eligible property, 85(1.1)
 - cost of capital property where change in control of corporation, 111(4)(e)
 - Crown corporation, to remain taxable, 149(1.11)
 - currency to use other than Canadian dollar, 261(3)
 - death of taxpayer, 70(6.2), Reg. Part X
 - debt settled on windup of subsidiary into parent, 80.01(4)
 - deemed capital loss on partnership interest, 40(3.12)
 - deemed disposition of bad debt or share of insolvent corporation, 50(1)
 - deemed disposition of capital property on change of control, 111(4)(e)
 - deferral of “departure tax” payment, 220(4.5)–(4.54), Reg. 1301
 - departure tax, *see* taxpayer ceasing to be resident (*below*)
 - derivatives, mark-to-market treatment, 10.1
 - disposition of Canadian securities, 39(4)
 - disposition of share in foreign affiliate, 93(1), (1.1), (1.11)
 - disposition of vessel, 13(16)
 - eligible non-residential building, Reg. 1101(5b.1)
 - emigration that is temporary, ignored, 128.1(6)(a), (c), 128.1(7)(d), (g)
 - employees profit sharing plan, Reg. 1500
 - excessive, re dividend
 - • treatment of excess as separate dividend, 184(3), Reg. 2106
 - executor, by, to carry back losses to year of death, 164(6)
 - expropriation assets, re, 80.1(1), Reg. 4500
 - fiscal period, non-calendar year, 249.1(4)
 - fiscal period of terminated partnership, 99(2)–(4)
 - fishermen, tax deduction, Reg. 105.1
 - foreign trust reporting, 233.2(5)
 - forward averaging, 110.4(2) [repealed]
 - • revocation, 110.4(6.1) [repealed]
 - functional currency other than Canadian dollar, 261(3)
 - gifts by communal organizations, allocated to members, 143(3.1)
 - inducement, where offset by expense, 12(2.2)
 - insurer
 - • non-resident, 219(5.2)
 - interest on expropriation assets, 80.1(2)
 - investment tax credit, renunciation by general partner, 127(8.4)
 - involuntary dispositions, 13(4)
 - joint exploration corporation, 66(10)–(10.4)
 - late, 220(3.2)–(3.7); Reg. 600
 - leasing properties, in respect of, 16.1(1)
 - legal representative of deceased taxpayer, *see also* Legal representative of deceased taxpayer
 - manufacturing and processing property, Reg. 1102(16.1)
 - mark-to-market treatment of derivatives, 10.1
 - mortgage investment corporation, re capital gains dividend, 130.1(4)
 - • where not made, 130.1(4.1)
 - mutual fund corporation, re dividend, 131(1)–(1.4)
 - mutual fund reorganization, 132.2(1)“qualifying exchange”(c)
 - mutual fund trust status from beginning of first year, 132(6.1)
 - non-resident, to file return under Part I, 216(1), 217
 - • restriction on deduction, 216(8)
 - non-resident parent corporation, re interest on loan, 218(3), (4)
 - Part II of former Act, under, ITAR 66
 - Part VI.1 tax, to pay, 191.2
 - partners, by
 - • re property transferred, 97(2)

Election (*cont'd*)

- validity of, 96(3)
- partnership ceasing to exist
- rules applicable, 98(3), (4)
- partnership's Canadian development expenses, 66.2(5) "Canadian development expense" (f)
- partnership's Canadian oil and gas property expenses, 66.4(5) "Canadian oil and gas property expense" (b)
- personal injury award, 81(5)
- personal representative, by, to carry back losses to year of death, 164(6)
- post-emigration loss, 128.1(8)
- postponement of departure tax by posting security, 220(4.5)–(4.54)
- postponement of tax on distribution of property by trust to non-resident beneficiary, by posting security, 220(4.6)–(4.63)
- preferred beneficiary, of trust, 104(12), 104(14), Reg. 2800
- principal residence, 45(3)
 - distribution by spousal trust, 107(2.01)
 - where not available, 45(4)
- property owned on Dec. 31/71, ITAR 26(7)
- proportional holdings in trust property, 259(2)
- proprietor, on disposing of business, 25
- public corporation, to be, ITAR 50(2)
- qualifying dividend
 - late-filed, 83(3)–(5)
- replacement property, 13(4), 44(5)
- representation expense, 20(9)
- research and development, 37(8)(a)(ii)(B), 37(10)
- reserves for year of death, 72(2)
- retirement compensation arrangement
 - refundable tax, 207.5(2)
- revocation of, *see* Revocation of elections
- rights or things on death, re, 70(2)
- revocation of, 70(4)
- RPP contribution
 - additional voluntary contributions, 8(1.1)
- sale of accounts receivable, 22
- scientific research, 37(8)(a)(ii)(B), 37(10)
- scientific research tax credit, re first holder of share, 127.3(9)
- segregated fund trusts, Reg. 6100
- services not rendered, 20(24), (25)
- specified leasing property not to be exempt property, Reg. 1100(1.14)
- spousal attribution rule on emigration, 74.2(3)
- stock option
 - by employer to forgo deduction for cash payment, 110(1.1), (1.2)
 - subsec. 26(7) of ITAR, under, Reg. 4700
- surpluses, re, Reg. Part XXI
- taxpayer ceasing to be resident
 - deferral of capital gains, 128.1(4)(d), Reg. 1300–1302
 - deferral of payment of taxes, 220(4.5)–(4.6)
 - realization of capital gains, 128.1(4)(d), Reg. 1302
 - time of acquisition of control, re, 256(9)
- transfer of property to corporation
 - partnership, from, 85(2), (6)–(9)
 - partnership wound up, 85(3)
 - shareholder, by, 85(1), (6)–(9)
 - eligible property, 85(1.1)
- treat bovine animal as specified animal, 28(1.2)
- treat dividend as capital dividend, to, 83(2.2)–(2.4)
 - where not available, 83(2.1)
- trigger capital gain on small business corporation share, 48.1
- trust, by
 - accumulating income, 104(12), 104(14), Reg. 2800
 - capital distribution, no rollover, 107(2.001)
 - gains not distributed to beneficiaries, 107(2.11), (2.12)
 - preferred beneficiary, 104(12), 104(14), Reg. 2800

- V-day value, re, Reg. 4700
- withholding tax, 153(1)(n)
 - to increase, 153(1.2), Reg. 109
- work in progress of professional, exclusion of until 2017, 34

Election expenses

- contributions deductible, 127(3)–(4.2)

Electric, gas or steam corporations

- information returns, Reg. 213

Electric car, *see* Zero-emission vehicle**Electric motor system technician**

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

Electric vehicle charging station

- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xvii)

Electrical advertising signs

- capital cost allowance, Reg. Sch. II:Cl. 11

Electrical energy, *see* Energy: electrical**Electrical energy storage property**

- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xviii)

Electrical furnace

- medical expense credit for, Reg. 5700(c.2)

Electrical generating equipment

- capital cost allowance, Reg. Sch. II:Cl. 1(k), Sch. II:Cl. 2(a), Sch. II:Cl. 8(g), Sch. II:Cl. 8(h), Sch. II:Cl. 9(e), Sch. II:Cl. 9(f), Sch. II:Cl. 17(a.1), Sch. II:Cl. 29, Sch. II:Cl. 41, Sch. II:Cl. 43.1, Sch. II:Cl. 43.2
- electrical energy producer/distributor
 - capital cost allowance, Reg. Sch. II:Cl. 1(m), Sch. II:Cl. 8(f), Sch. II:Cl. 9(a)
- for mine
 - capital cost allowance, Reg. 1102(8)–(9.2), Reg. Sch. II:Cl. 10(r), Sch. II:Cl. 41

Electricity, *see* Energy: electrical**Electricity Support Program, *see* Ontario: Electricity Support Program****Electrolux-Husqvarna spinoff, Reg. 5600(c)****Electronic cash register**

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

Electronic communications equipment

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

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

- print-out as proof, 244(9)

Electronic filing

- E-FILE, 150.1
- information returns
 - emailing of T4, T4A, T5 or T2202, Reg. 209(5)
 - emailing of taxpayer portion with express consent, Reg. 209(3), (4)
 - mandatory, Reg. 205.1
 - optional, 244(22)
- mandatory
 - for certain corporations, 150.1(2.1), Reg. 205.1(2)
 - for certain tax preparers, 150.1(2.3), (2.4)
 - penalty (filing fee) for non-compliance, 162(7.3)
 - for Part XX digital platform reporting, 291(5)
 - penalty for failing to file electronically, 162(7.2)
- proof of return filed, 244(21)
- tax returns, 150.1

Electronic funds transfer

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

Index

Electronic mail

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

Electronic notice

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

Electronic payment

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

Electronic records

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

Electronic suppression of sales device

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

Electronics technician (consumer products)

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

Electrotherapy device

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

Elevator

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

Eligible adoption expense

- defined, 118.01(1)

Eligible alignment income

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

Eligible amount

- charitable donations
 - defined, 248(31), (41)
 - limits amount of donation credit, 110.1(1)(a), 118.1(1)“total charitable gifts”
- defined
 - for charitable or political donations, 248(31), (41)
 - where deemed nil for donation over \$5,000, 248(41)
 - for foreign retirement arrangement, 60.01
 - for Home Buyers’ Plan, 146.01(1)
 - for Lifelong Learning Plan, 146.02(1)
 - for RRIF, 146.3(6.11)
 - political contributions, 248(31)
 - defined, 248(31), (41)
 - limits amount of political credit, 127(3)

Eligible apprentice

- defined, 127(9)

Eligible apprentice mechanic

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

Eligible bank affiliate

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

Eligible business entity

- defined, 204.8(1)

Eligible Canadian bank

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

Eligible Canadian indebtedness

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

Eligible Canadian partnership

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

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

Eligible capital expenditure

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

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

- 2017 and later, *see* Goodwill
- disposition of before March 22, 2016, 13(43)

Eligible child

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

Eligible child care space expenditure

- defined, 127(9)

Eligible controlled foreign affiliate

- defined, 95(4)

Eligible corporation

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

Eligible currency hedge

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

Eligible debt (of Canadian wheat board)

- defined, 135.2(1)

Eligible derivative

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

Eligible distribution

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

Eligible dividend

- defined, 89(1), 248(1)
- designation of, 89(14)
- dividend compensation payment deemed to be, 260(1.1), (5)
- excessive, *see* Excessive eligible dividend designation
- 45% gross-up, 82(1)(a.1), 82(1)(b)(ii)
- late designation, 89(14.1)
- partial, 89(1)“eligible dividend”(a)

Eligible donee

- for charity revocation tax
 - defined, 188(1.3)
 - transfer to, 188(1.1)B(c), 189(6.2)(b), 189(6.3)
- for RCAA revocation tax
 - defined, 188(1.4)

Eligible dwelling

- defined
 - for home accessibility credit, 118.041(1)
 - for Multigenerational Home Renovation Tax Credit, 122.92(1)

Eligible educator

- defined, for teacher school-supplies credit, 122.9(1)

Eligible employee

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

Eligible employer

- defined, for 2020 COVID-19 benefit, 153(1.03)
- for COVID-19 Canada Emergency Wage Subsidy, *see* Eligible entity

Eligible entity

- defined

Eligible entity (*cont'd*)

- for air quality improvement credit, 127.43(1)
- for COVID-19 Canada Emergency Wage Subsidy, 125.7(1), Reg. 8901.1
- re residence of international shipping corporation, 250(6.04)

Eligible family member

- defined, for northern residents' deduction, 110.7(6)

Eligible farming expenses

- for carbon tax refund to farmers, 127.42(1)

Eligible fiscal period

- defined, 34.2(1)“eligible alignment income”(a), (b)

Eligible funeral arrangement, 148.1

- defined, 148.1(1), 248(1)
- emigration of individual, no deemed disposition, 128.1(10)“excluded right or interest”(e)(iv)
- excluded from various trust rules, 108(1)“trust”(e.1)
- exemption for amount accruing in, 148.1(2)(a)
- income inclusion on return of funds, 12(1)(z.4), 148.1(3)
- information return, Reg. 202(2)(m)
- payment to non-resident, Reg. 202(2)(m)
- information return, Reg. 202(2)(m)
- withholding tax, 212(1)(v)
- payment to resident, Reg. 201(1)(f)
- provision of funeral services under, 148.1(2)(b)(i)
- rollover to new trust, 248(1)“disposition”(f)(vi)

Eligible group entity

- defined, for interest deduction restrictions, 18.2(1), (16)
- transitivity deeming rule, 18.2(16)

Eligible housing loss, *see* Housing loss: eligible**Eligible individual**

- defined
- for Canada Child Benefit, 122.6, 122.62(1); Reg. 6301, 6302
- for Canada Workers Benefit, 122.7(1)
- for Climate Action Incentive, 122.8(1)
- for GST credit, 122.5(1), (2)
- for home accessibility tax credit, 118.041(1)
- for Multigenerational Home Renovation Tax Credit, 122.92(1)
- for refundable medical expense credit, 122.51(1)
- for restrictive-covenant rules, 56.4(1)
- for rollover to RDSP on death, 60.02(1)

Eligible interest

- defined
- for residence of international shipping corporation, 250(6.04)
- for restrictive covenant rules, 56.4(1)

Eligible investment

- defined, 204.8(1)
- of financial institution, for capital tax
- defined, 181.3(5), 190.14(2)
- of labour-sponsored venture capital corporation
- tax where insufficient, 204.82
- refund of tax, 204.83

Eligible labour body

- defined, 204.8(1)

Eligible landfill site

- defined, Reg. 1104(13)

Eligible liquefaction activities

- income from, defined, Reg. 1100(18)

Eligible liquefaction building

- additional CCA, Reg. 1100(1)(a.3)
- defined, Reg. 1104(2)

Eligible liquefaction equipment

- additional CCA, Reg. 1100(1)(yb)
- defined, Reg. 1104(2)

Eligible liquefaction facility

- building for
- CCA, Reg. 1100(1)(a.3), Sch. II:Cl. 1(q)
- separate class, Reg. 1101(5b.2)
- defined, Reg. 1104(2)
- equipment for
- CCA, Reg. 1100(1)(yb), Sch. II:Cl. 47
- separate class, Reg. 1101(4i)

Eligible medical gift (pre-2019), 110(1)(a.1), 110.1(8), (9)**Eligible member**

- defined, for agricultural cooperatives, 135.1(1)

Eligible mine development property

- defined, Reg. 1104(2)
- inclusion in Class 41, Reg. Sch. II:Cl. 41.2 opening words

Eligible newsroom employee

- defined, for journalism labour credit, 125.6(1)

Eligible non-residential building

- addition or alteration to, rules for, Reg. 1102(23), (24)
- additional allowance for, Reg. 1100(1)(a.1), (a.2)
- manufacturing and processing, used for, Reg. 1100(1)(a.1)
- defined, Reg. 1104(2)
- separate CCA class, Reg. 1101(5b.1)
- under construction on March 19, 2007, Reg. 1102(25)

Eligible offset

- application on rollout of property by trust, 107(2)(c)(ii), 107(2.1)(c)(iii)
- excluded from disposition, 248(1)“disposition”(h)
- defined, 108(1)

Eligible oil sands mine development expense

- defined, 66.1(6)
- included in CEE, 66.1(6)“Canadian exploration expense”(g.2)(ii)

Eligible PRPP withdrawal amount

- defined, 60.022(4)

Eligible pension income

- defined
- for non-refundable pension credit, 118(7)
- for pension income splitting, 60.03(1)

Eligible period

- defined, for 2020 COVID-19 benefit, 153(1.03)

Eligible period of reduced pay

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

Eligible period of temporary absence

- defined, Reg. 8500(1)

Eligible person or partnership

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

Eligible pooling arrangement

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

Eligible portion (of corporation's gains or losses)

- defined, 129(4)

Eligible portion (of the specified amount)

- re royalty reimbursements, 80.2(11)

Eligible proceeds

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

Eligible production corporation

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

Eligible property

- conversion of foreign bank affiliate to branch
- defined, 142.7(1)
- shareholder/corporation rollover, for, 85(1)

Index

- Eligible property (*cont'd*)
 - defined, 85(1.1)
 - limitation re real property of non-resident, 85(1.2)
- Eligible RRIF withdrawal amount**
 - defined, 60.022(2)
- Eligible relocation**
 - defined, 248(1)
 - moving expenses deductible, 62
- Eligible remuneration**
 - defined, for 2020 COVID-19 benefit, 153(1.03)
 - defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)
- Eligible resale property**
 - defined, for SIFT REIT rules, 122.1(1)
 - gains from disposition of, 122.1(1)“real estate investment trust”(b)(vi)
 - revenue from managing, 122.1(1)“qualified REIT property”(b)
- Eligible refundable dividend tax on hand**
 - defined, 129(4)
 - transitional determination for 2019, 129(5)
 - on amalgamation, 129(5.1)
 - refund of, 129(1)(a)(i)(B), 129(1)(a)(ii)(B)(I)2
- Eligible salary and wages**
 - defined, 127(9), (11.4)
- Eligible sewage treatment facility**
 - defined, Reg. 1104(13)
- Eligible share (of Canadian Wheat Board)**
 - defined, 135.2(1)
- Eligible small business corporation**
 - defined, for small business investment capital gain rollover, 44.1(1), (10)
 - share
 - defined, for small business investment capital gain rollover, 44.1(1), (11)
- Eligible supplies expense**
 - defined, for teacher school-supplies credit, 122.9(1)
 - refundable credit for, 122.9(2)B(b)
- Eligible survivor benefit period**
 - defined, Reg. 8500(1)
- Eligible taxable capital gains of trust, defined**, 108(1)“eligible taxable capital gains”
- Eligible taxation year**
 - defined, for retroactive spreading of lump-sum payments, 110.2(1)
- Eligible taxpayer**
 - defined, for small business investment tax credit, 127(9)
- Eligible temporary relocation**
 - defined, for labour mobility deduction, 8(14)(c)
 - expense, *see* Eligible temporary relocation expense
- Eligible temporary relocation expense**
 - defined, for labour mobility deduction, 8(14)(d), (e)
- Eligible tool**
 - cost of, 8(7)
 - deduction for, *see* Apprentice: mechanic
 - defined, 8(6)(b), 8(6.1)
- Eligible tradesperson**
 - deduction for moving to temporary work, 8(1)(t)
 - defined, for labour mobility deduction, 8(14)(a)
- Eligible transferee (of forgiven debt)**
 - agreement to transfer forgiven amount to, 80.04(4)
 - defined, 80.04(2)
- Eligible travel period**
 - defined, for long-haul trucker rules, 67.1(5)
- Eligible trust**
 - defined
 - for Canadian Wheat Board farmers, 135.2(1)
 - for FAPI rules, 95(1)
- Eligible unit**
 - defined, re Canadian Wheat Board Farmers' Trust, 135.2(1)
- Eligible use**
 - for captured carbon, defined, 127.44(1)
- Eligible variable benefit withdrawal amount**
 - defined, 60.022(3)
- Eligible volunteer firefighting services**
 - credit for, 118.06(2)
 - defined, 118.06(1)
- Eligible waste fuel**
 - defined, Reg. 1104(13)
 - used in energy generation system, Reg. Sch. II:Cl. 43.1(c)(i)(A), Sch. II:Cl. 43.1(d)(ix), Sch. II:Cl. 43.2
- Eligible waste management facility**
 - defined, Reg. 1104(13)
- Eligible wind-up distribution (of Canadian Wheat Board Farmers' Trust)**
 - defined, 135.2(1)
- Elk**, 80.3(1)“breeding animals”
- Email**, *see* Electronic mail
- Emergency-response vehicle**
 - deemed not to be automobile, 248(1)“automobile”(b.1), (b.2)
- Emergency worker**
 - volunteer
 - exemption from employment income, 81(4)
- Emigration**, *see* Ceasing to be resident in Canada
- Emigration disposition**
 - defined, 74.2(3)
- Emigration year**
 - defined
 - for foreign tax credit, 126(2.21)
 - for security for departure tax, 220(4.5)
- Emissions allowance**
 - deemed cost, 27.1(2)
 - defined, 248(1)
 - excluded from taxable assistance, Reg. 7300(d)
 - tax treatment of, 27.1
- Emissions obligation**
 - defined, 248(1)
 - restriction on deduction for, 27.1(3)
- Emissions trading regime**, 27.1
- Employed**
 - defined, 248(1)
 - in Canada
 - deemed, 115(2)(c)
 - non-residents, tax on, 2(3), 115(1)
 - part-year residents, 114
- Employee**
 - aircraft
 - capital cost allowance, 8(1)(j)(ii), 13(11)
 - deductions allowed, 8(1)(j), 8(9)
 - allowances, 6(1)(b)
 - not income, 6(6)
 - automobile (belonging to employee)
 - capital cost allowance, 8(1)(j)(ii), 13(11), Reg. 1100(1)(a)(x), 1100(6)
 - interest expense, 8(1)(j)(i), 67.2, 67.4
 - leasing expense, 67.3, 67.4
 - automobile (belonging to employer)
 - employee of partner, 12(1)(y)
 - goods and services tax, treatment of, 6(7)
 - operating expenses, benefit, 6(1)(k), (l), Reg. 7305.1
 - rule for automobile salesperson, 6(2.1)
 - standby charge, benefit, 6(1)(e), 6(2)

Index

Employee (*cont'd*)

- automotive products, transitional assistance benefits taxable, 56(1)(a)(v)
- benefit, *see* Benefit: employment
- benefit plan, *see* Employee benefit plan
- benefits taxable, 6(1)
- Canada Pension Plan, contribution, credit for, 118.7
- charity trust, receipts, Reg. 3502
- clergyman's residence, 8(1)(c)
- contribution to RPP deductible, 147.2(4)
- contribution to teachers' exchange fund, 8(1)(d)
- deductions, *see* Deductions in computing income from office or employment
- defined, 248(1)
 - • for employee life and health trusts, 144.1(1)
 - • for source deductions, Reg. 100(1)
- dues
 - • deduction, 8(1)(i)
 - • non-deductible, 8(5)
- dues to professional organization, deductible, 8(1)(i)(i)
- employer, as
 - • deductions, 8(1)(i)(ii), 8(1)(l.1), 8(1)(l.2)
 - • • certificate of employer, 8(10)
 - • employment insurance premiums
 - • • as employer, deductions, 8(1)(l.1)
 - • • credit for, 118.7
- expenses of
 - • deductions, 8(1)
 - • general limitation, 8(2)
- foreign country, of
 - • exemption, 149(1)(a)
 - • family and servants of, 149(1)(b)
- former, *see* Former employee
- group insurance premium, portion taxable, 6(4)
- housing loan to, or spouse, 15(2.4)(b)
- includes officer, 248(1)
- income maintenance plan benefits, ITAR 19
- incorporated, *see* Personal services business
- international organization, of, tax deduction, 126(3)
- legal costs recovered, income, 56(1)(l)
- legal expenses of collecting or establishing right to wages, 81(1)(b)
- loan, *see* Employee loan
- meals, 8(4)
- more than five, *see* Six employees test
- musical instrument costs, 8(1)(p)
- negotiating contracts, expenses, 8(1)(f)
 - • certificate of employer, 8(10)
- part-time
 - • travelling allowance, excluded from income, 81(3.1)
- payments received from employer
 - • during employment, 5(1), 6(3)
 - • on death, *see* Death benefit
 - • on termination or retirement, *see* Retiring allowance
- profit sharing plan, *see* Employees profit sharing plan
- Quebec Parental Insurance Plan premiums
 - • as employer, deductions, 8(1)(l.2)
 - • credit for, 118.7:B(a.1), (a.2)
 - • deduction for, 60(g)
- railway, *see* Railway: employees, 8(1)(e)
- registered pension plan contributions, 8(1)(m), 147.2(4)
- retirement compensation arrangement, *see* Retirement compensation arrangement
- return required of, re withholding of tax, 227(2), Reg. 107
 - • where not filed, 227(3)
- salary deferral arrangements, deduction for amounts forfeited under, 8(1)(o)
- salesperson's expenses, 8(1)(f)
 - • certificate of employer, 8(10)
 - • share option benefits, 7(1)
 - • shares held by trustee, 7(2)
 - • shares purchased for, by trustee, 7(6)
 - • sickness and accident benefits, income, 6(1)(f)
 - • specified, *see* Specified employee
 - • stock options, *see* Stock option
 - • transport, away-from-home expenses, 8(1)(g)
 - • travelling expenses of, 8(1)(h)
 - • • certificate of employer, 8(10)
 - • • limitation, 8(4)
 - • • • re meals, 8(4)
 - • trust, *see* Employee trust
 - • unemployment insurance premiums
 - • • credit for, 118.7
 - • union dues, deductible, 8(1)(i)(i)
- **Employee benefit plan**
 - • allocations, 32.1(2)
 - • amalgamation, on, 87(2)(j.3)
 - • amount received from, *see* payments out of (*below*)
 - • becoming retirement compensation arrangement
 - • • deemed contribution, 207.6(4)
 - • benefits from, taxable, 6(1)(g)
 - • • not taxable under general benefit provision, 6(1)(a)(ii)
 - • • who deemed to received benefit, 6(1.2)
 - • contributions to, 6(10)
 - • • not deductible, 18(1)(o)
 - • • when deductible, 18(10)
 - • deduction in computing income of, 104(6)(a.1)
 - • deduction to employer, 32.1
 - • defined, 248(1)
 - • distribution of property by, deemed disposition at cost amount, 107.1(b)
 - • emigration of employee, no deemed disposition, 128.1(10)"excluded right or interest"(a)(vi)
 - • excluded from non-resident trust rules, 94(1)"exempt foreign trust"(f)
 - • excluded from various trust rules, 108(1)"trust"(a)
 - • income of, 32.1(3)
 - • payments out of
 - • • not subject to non-resident tax, 212(17)
 - • • to employee, taxable, 6(1)(g)
 - • • • source withholding, 153(1)(a)
 - • • to employer, taxable, 12(1)(n.1)
 - • prescribed arrangement, Reg. 6800
 - • reversionary trust rules do not apply, 75(3)(a)
- **Employee health and life trust**, *see* Employee life and health trust
- **Employee life and health benefit trust**, *see* Employee life and health trust
- **Employee life and health trust**, 144.1
 - • amalgamation of corporations, effect of, 87(2)(j.3)
 - • benefits under insurance plan administered by, 6(1)(f)(iii.1)
 - • ceasing to be resident in Canada, 128.1(4)(b.1)
 - • conditions for, 144.1(2), (3)
 - • deduction from income, 104(6)(a.4)
 - • deemed not to be EBP, 248(1)"employee benefit plan"(a)
 - • deemed not to be RCA, 248(1)"retirement compensation arrangement"(f.1)
 - • deemed not to be SDA, 248(1)"salary deferral arrangement"(e.1)
 - • defined, 144.1(2), 248(1)
 - • designated employee benefit, *see* Designated employee benefit
 - • distribution by
 - • • included in income if not designated employee benefit, 56(1)(z.2), 144.1(11)
 - • • withholding of tax at source
 - • • • payment to Canadian resident, 153(1)(s), Reg. 100(1)"remuneration"(h.1)
 - • • • payment to non-resident, 212(1)(w)

Index

- Employee life and health trust (*cont'd*)
 - of property, deemed disposition at fair market value, 107.1(a)
 - emigration of beneficiary, no deemed disposition, 128.1(10)“excluded right or interest”(e)(vi.1)
 - employer contribution to
 - deductible to employer, 20(1)(s), 144.1(4)–(7)
 - not a taxable benefit to employee, 6(1)(a)(i)
 - excluded from certain trust rules, 108(1)“trust”(a)
 - exemption from Part XII.2 tax, 210(2)(d)
 - former employees, 144.1(1)“employee”
 - health and welfare trust
 - transfer of property to ELHT, 144.1(16)–(17)
 - treated as ELHT, 144.1(14)–(15)
 - immigration of beneficiary, no deemed disposition, 128.1(10)“excluded right or interest”(e)(vi.1)
 - key employee, *see* Key employee
 - losses, carryback and carryforward, 111(7.3)–(7.4), 144.1(13)
 - minimum tax not payable by, 127.55(f)(iv)
 - prescribed payments permitted to employers, Reg. 9500
 - prohibited investment, tax on, 207.9
 - reversionary trust rules do not apply, 75(3)(b)
- Employee loan**, 6(9), 80.4(1)
 - forgiven, amount to be included in income, 6(15)
 - to buy motor vehicle, 15(2.4)(d)
 - to buy stock, 15(2.4)(c)
- Employee ownership trust**
 - defined, 248(1)
 - disposition of shares to, 10-year reserve, 40(1.3)
 - may borrow from corp to finance purchase of corp’s shares if it repays within 15 years, 15(2.51)
 - not subject to 21-year deemed disposition rule, 108(1)“trust”(h)
 - not subject to certain other trust rules, 108(1)“trust”(a.1)
- Employee trust**, 6(1)(h)
 - allocations under, includable in income, 6(1)(h)
 - benefits from, not includable in employee’s income, 6(1)(a)(ii)
 - deduction in computing income of, 104(6)(a)
 - defined, 248(1)
 - distribution of property by, deemed disposition at fair market value, 107.1(a)
 - emigration of employee, no deemed disposition, 128.1(10)“excluded right or interest”(e)(i)
 - excluded from various trust rules, 108(1)“trust”(a)
 - payments out of, not subject to non-resident tax, 212(17)
 - receipt from, 12(1)(n)
 - rollover to new trust, 248(1)“disposition”(f)(vi)
 - trust not falling within definition, 108(1)“trust”(a.1)
- Employees’ charity trust**
 - defined, Reg. 3500
- Employees profit sharing plan**
 - allocations under, income, 6(1)(d), 144(3)
 - capital gains allocated, 144(4)–(4.2)
 - deferred profit sharing plan not an, 147(6)
 - defined, 144(1), 248(1)
 - disposition of property to, capital loss nil, 40(2)(g)(iv)(A)
 - dividend credit allocated, 144(8)
 - election, Reg. 1500
 - emigration of employee, no deemed disposition, 128.1(10)“excluded right or interest”(a)(v)
 - employer’s contribution, deduction, 20(1)(w), 144(5)
 - excess EPSP amount
 - deduction from income to prevent double tax, 8(1)(o.2)
 - defined, 207.8(1)
 - tax on, 207.8(2)
 - excluded from non-resident trust rules, 94(1)“exempt foreign trust”(e)
 - excluded from various trust rules, 108(1)“trust”(a)
 - foreign tax credit, 144(8.1)
 - income allocated, 144(3)
 - information return, Reg. 212
 - interest income, allocation re, 144(8.2)
 - payment under
 - portion excluded from income, 81(1)(k)
 - payments “out of profits” defined, 144(10)
 - receipts from, 12(1)(n)
 - by employee, 144(6)–(8)
 - refund to former beneficiary, 144(9)
 - registration of, as DPSP, 147(3), (4)
 - reversionary trust rules do not apply, 75(3)(a)
 - rollover to new trust, 248(1)“disposition”(f)(vi)
 - trust not taxable, 144(2), 149(1)
- Employer**
 - benefits provided by, taxable, 6(1)
 - Canada Emergency Wage Subsidy (COVID-19), 125.7
 - certificate re employees’ expenses, 8(10)
 - contributions of
 - Canada Pension Plan, to
 - deductible, 8(1)(l.1)(i)
 - deferred profit sharing plan, to, 20(1)(y), 147(8)–(9.1)
 - limitation on deductibility, 18(1)(j)
 - employees profit sharing plan, to, 20(1)(w), 144(5)
 - employment insurance premiums
 - deductible, 8(1)(l.1)(i), 9(1)
 - pension plan, 20(1)(q), 147.2(1)–(3), Reg. Part XXVII [Revoked]
 - special, 20(1)(r)
 - profit sharing plan, to
 - limitation on deductibility, 18(1)(k)
 - Quebec Parental Insurance Plan premiums
 - deductible, 8(1)(l.2), 9(1)
 - registered supplementary unemployment benefit plan, to, 145(5)
 - limitation on deductibility, 18(1)(i)
 - deduction re salary deferral arrangements, 20(1)(oo)
 - defined, 248(1)
 - for automobile standby charge, 6(2)
 - for disability insurance top-up payments, 6(17)
 - for employee loans, 80.4(1)(b)(i)
 - for incorporated employee/RCA rules, 207.6(3)(a)
 - for municipal officer’s expense allowance, 81(3)(c)
 - for source deductions, Reg. 100(1)
 - generally, 248(1)
 - eligible, *see* Eligible employer
 - housing subsidy, taxable, 6(23)
 - insolvent, commutation of benefits, *see* Registered pension plan: insolvent employer
 - participating, defined, 147.1(1), Reg. 8308(7)
 - payment to employee
 - during employment, 5(1), 6(3)
 - on death, *see* Death benefit
 - on termination or retirement, *see* Retiring allowance
 - reimbursement for housing loss, 6(19)–(22)
 - union locals all deemed to be one, for pension purposes, 252.1
 - withholding of tax, 153(1), Reg. 101
 - variations in deductions, Reg. 106
- Employment**
 - benefits, *see* Benefit
 - defined, 248(1)
 - expenses, *see* Employee: expenses of
 - income from, 5(1), 6(1), Canada-U.S. Tax Treaty:Art. XV
 - reimbursement to employer, 8(1)(n.1)
 - insurance, *see* Employment insurance
 - loss from, 5(2)
 - office or, *see* Office or employment
 - outside Canada, tax credit (pre-2016), 122.3
 - special work site, at, 6(6)
 - termination of, *see* Former employee; Retiring allowance

- Employment Credit**, *see* Canada Employment Credit
- Employment insurance**, *see also* Registered supplementary unemployment benefit plan
- benefit
 - remuneration, Reg. 100(1)
 - repayment of, 60(v.1)
 - repayment of overpayment, deduction for, 60(n)(iv)
 - right to, no disposition on emigration, 128.1(10)“excluded right or interest”(h)
 - self-employment (Part VII.1), taxable, 56(1)(a)(iv)
 - taxable, 56(1)(a)(iv)
 - withholding tax, 153(1)(d.1), Reg. 100(1)“remuneration”(g)
 - income replacement benefits under temporary program, 56(1)(r)
 - premium
 - collection of debt by US Internal Revenue Service, Canada-U.S. Tax Treaty:Art. XXVI-A:9
 - paid by employee
 - as employee, credit, 118.7:B(a)
 - as employer, deduction, 8(1)(l.1)
 - paid by employer, deduction, 9(1) (general accounting principles)
 - paid by self-employed person, credit, 118.7:B(a)
 - Program for Older Worker Adjustment, *see* Older Worker Adjustment, Program for
 - tips and gratuities covered by, Reg. 100(1)“remuneration”(a.1)
- Employment Insurance Act**
- benefits under, *see* Employment insurance: benefit
 - costs of appealing decision under, deductible, 60(o)
 - recovery of, income, 56(1)(l)(ii)
 - financial assistance under, 56(1)(r)
- Enactment**, *see also* Amendment; Legislation
- defined, ITAR 12“enactment”
- End of taxation year**
- defined, Reg. 1104(1)
- Endowment date**
- of exemption test policy, defined, Reg. 310
- Endowment (to charity)**, *see* Enduring property [repealed]
- Enduring property [repealed]**
- of registered charity
 - defined, 149.1(1)
- Energy**
- conservation property, Reg. 8200.1, Reg. Sch. II:Cl. 43.1
 - determination of, 13(18.1)
 - disclosure of information to Energy, Mines & Resources, 241(4)(d)(vi.1)
 - conversion grant
 - included in income, 12(1)(u), 56(1)(s)
 - information return re, Reg. 224
 - non-resident taxable on, 212(1)(s)
 - prescribed program, Reg. 5501
 - distribution of, 66(15)“principal-business corporation”(h)
 - electrical
 - combustion turbine for, separate class, Reg. 1101(5t)
 - corporation distributing or generating
 - equipment for, Reg. 1102(8), (9), Sch. II:Cl. 1(m), Sch. II:Cl. 2(c)
 - exclusion from CCA restrictions, Reg. 1100(26)(a)
 - information return, Reg. 213(1)
 - municipal corporation, exemption, 149(1.2)
 - equipment for processing in prescribed area, 127(9)“qualified property”(c.1)
 - generating equipment, capital cost allowance, Reg. Sch. II:Cl. 17(a.1)
 - generating, manufacturing & processing credit, 125.1(2)
 - producing or processing, 125.1(3)“manufacturing or processing”(h), Reg. 1104(9)(h)
 - generation of, 66(15)“principal-business corporation”(h)
 - property, *see* Specified energy property
 - renewable, generation of, Reg. Sch. II:Cl. 43.1
- Energy Cost Benefit**
- disclosure of taxpayer information to enable payment, 241(4)(d)(vii.2)
 - payments non-taxable, 81(1)(g.5)
- Energy, Mines & Resources**, *see* Department of Energy, Mines and Resources
- Enforcement of Act**, 220–244, *see also* Collection of tax
- Engineer**, *see* Professional practice
- England**, *see* United Kingdom
- Enhanced combined cycle system**
- defined, Reg. 1104(13)
- Enhanced garnishment**, 224(1.2), (1.3)
- Enhanced recovery equipment**, Reg. 1206(1)
- proceeds of disposition, 59(3.3)(d)
- Enquiry**, *see* Inquiry
- Entering Canada**, *see* Becoming resident in Canada
- Entertainer**
- U.S. resident, Canada-U.S. Tax Treaty:Art. XVI
- Entertainment expenses (and meals)**
- airplane, train, bus travel, 67.1(4)
 - Christmas party exemption, 67.1(2)(f)
 - club dues and facilities, 18(1)(l)
 - construction work camp exemption, 67.1(2)(e.1)
 - “entertainment” meaning of, 67.1(4)
 - general limitation on deduction for, 67.1(1)
 - exceptions, 67.1(2)
 - included in convention fee
 - limitation on deductibility, 67.1(3)
 - interpretation, 67.1(4)
- Entity**
- defined
 - for Common Reporting Standard, 270(1)
 - for digital platform operator reporting rules, 282(1)
 - for electronic funds transfer reporting, 244.1
 - for foreign affiliates, 95(1)
 - for SIFT trust and partnership distributions, 122.1(1)
 - for stapled-security rules, 18.3(1), 122.1(1)
 - for third-party civil penalty, 163.2(1)
- Entrant bank**
- defined, for conversion of foreign bank affiliate to branch, 142.7(1)
- Entrusted shares percentage [repealed]**, *see* Exempt shares percentage
- Entry**
- Canada, into, *see* Becoming resident in Canada
 - dwelling-house, into, for audit, 231.1(3), *see also* Search warrant
 - compliance required, 231.5(2)
- Environment**
- conservation of, *see* Ecological gifts
- Environmental law**
- compliance with
 - required for certain Canadian renewable and conservation expenses, Reg. 1219(5)
 - required for clean-energy CCA, Reg. 1104(17)
- Environmental Quality Act (Quebec)**
- trust required by, no tax on, 149(1)(z.1)
- Environmental trust**, *see* Qualifying environmental trust
- Environmentally hypersensitive person**
- equipment qualifying for medical expense credit, Reg. 5700(c)–(c.2)
- Equalization payments (family law)**
- rules on partition of property, 248(20)
- Equipment**
- administering oxygen, for, 118.2(2)(k)

Index

Equipment (*cont'd*)

- automotive, CCA, Reg. Sch. II:Cl. 10(a), *see also* Automobile
- bituminous sands
 - defined, 59(6), Reg. 1206(1)
 - proceeds of disposition, 59(3.3)(c)
- cable systems interface, CCA, Reg. Sch. II:Cl. 10(v)
- contractor's movable, CCA, Reg. Sch. II:Cl. 10(h), Sch. II:Cl. 22, Sch. II:Cl. 38
- data communication, CCA, Reg. Sch. II:Cl. 3
- disability-specific, deduction for, 20(1)(rr)
- earth-moving, separate class, Reg. 1101(5k)
- electrical energy processing, investment tax credit, 127(9)"qualified property"(c.1)
- electrical generating, Reg. 1100(1)(t), (ta), Reg. Sch. II:Cl. 1(k), Sch. II:Cl. 1(m), Sch. II:Cl. 2(a), Sch. II:Cl. 8(g), Sch. II:Cl. 9(e), Sch. II:Cl. 9(f), Sch. II:Cl. 29
- electronic data-processing, CCA, Reg. Sch. II:Cl. 10(f), Sch. II:Cl. 29
 - general-purpose, defined, Reg. 1104(2)
- enhanced recovery, Reg. 1206(1)
 - proceeds of disposition, 59(3.3)(d)
- for hearing- or sight-impaired, business expense, 20(1)(rr)
- gas manufacturing/distribution, CCA, Reg. Sch. II:Cl. 1(n), Sch. II:Cl. 2(d)
- gas or oil well, CCA, Reg. 1104(2), Reg. Sch. II:Cl. 10(j)
- generating, Reg. 1100(1)(t), (ta), Reg. Sch. II:Cl. 1(k), Sch. II:Cl. 1(m), Sch. II:Cl. 2(a), Sch. II:Cl. 2(c), Sch. II:Cl. 8(f), Sch. II:Cl. 8(g), Sch. II:Cl. 9(a), Sch. II:Cl. 9(e), Sch. II:Cl. 9(f), Sch. II:Cl. 29
- heat production/distribution, CCA, Reg. Sch. II:Cl. 1(p), Sch. II:Cl. 2(f)
- logging, CCA, Reg. Sch. II:Cl. 10(o)
- machinery and, CCA, Reg. Sch. II:Cl. 8, Sch. II:Cl. 29
- medical, 118.2(2)(m), Reg. 5700
- mining, CCA, Reg. Sch. II:Cl. 10(k), Sch. II:Cl. 10(l), Sch. II:Cl. 10(m), Sch. II:Cl. 41
- oil or gas well, CCA, Reg. Sch. II:Cl. 10(j), Sch. II:Cl. 41
- petroleum/natural gas exploration, CCA, Reg. Sch. II:Cl. 10(t), Sch. II:Cl. 41
- pollution control, Reg. 1100(1)(t)
- prescribed
 - for sight- or hearing-impaired, business expense, 20(1)(rr)
 - medical, 118.2(2)(m), Reg. 5700
- radar, CCA, Reg. Sch. II:Cl. 9
- radio communication, CCA, Reg. Sch. II:Cl. 8, Sch. II:Cl. 9
- railway traffic control, CCA, Reg. Sch. II:Cl. 1(i)
- scientific research, for, 37(8)(a)(ii)
- solar heating, CCA, Reg. Sch. II:Cl. 43.1(d)(i), Sch. II:Cl. 43.2(b)
- stable, CCA, Reg. Sch. II:Cl. 10(c)
- telephone/telegraph, CCA, Reg. Sch. II:Cl. 3, Sch. II:Cl. 17
- tertiary recovery, Reg. 1206(1)
- timber limit, for, CCA, Reg. Sch. II:Cl. 10(n), Sch. II:Cl. 15
- water-distributing, CCA, Reg. Sch. II:Cl. 1(o), Sch. II:Cl. 10(e)

Equity

- defined
 - for RRSP, RRIF, TFSA, RESP and RDSP advantage rules, 207.01(1)
 - for SIFT trust definition, 122.1(1)
 - for stock buyback tax, 183.3(1)
 - for trust loss trading, 251.2(1)

Equity-accounted entity

- defined, for alternative interest-deduction restrictions, 18.21(1), (4)

Equity accounting method

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

Equity amount

- defined, for thin capitalization rules, 18(5), (5.3)

Equity contribution

- defined, for thin capitalization rules, 18(5)

Equity interest

- for alternative interest-deduction restrictions
 - defined, 18.21(1)
- hybrid mismatch arrangement rules
 - defined, 18.4(1)
 - in non-resident corporation without share capital
 - defined, 93.2(1)
 - treated as a share, 93.2(2)

Equity limit (of insurer)

- defined, Reg. 2400(1)

Equity or debt interest

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

Equity or financing return

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

Equity percentage

- defined
 - for foreign affiliate rules, 95(4)
 - for certain foreign affiliate surplus computations, Reg. 5905(14)
 - for private foundations, 149.1(1)
 - direct, defined, 95(4)"direct equity percentage"

Equity property

- defined, Reg. 2400(1)

Equity repurchase, *see* Stock buyback tax

Equity share, defined, 204, Reg. 4803(1)

Equity value

- defined
 - for SIFT trust and partnership distributions, 122.1(1)
 - for stapled-security rules, 18.3(1), 122.1(1)
 - for trust loss trading, 122.1(1), 251.2(1)

Equivalent to married credit, 118(1)B(b)

Equivalent to spouse credit, 118(1)B(b)

Escalating interest GICs

- income accrual, Reg. 7000(2)(c.1)

Established securities market

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

Establishment, *see* Permanent establishment

Estate, *see also* Trust (or estate)

- bankrupt, of
 - deemed not trust or estate, 128(1)(b)
 - defined, 248(1)
- Canada/Quebec Pension Plan death benefit taxed, 56(1)(a.1)
- carryback of losses to year of death, 164(6)
- debt of deceased settled by, 80(2)(p), (q)
- defined, 104(1), 248(1)
- flow-through of death benefits, 104(28)
- income of, paid to non-resident, 212(1)(c), 212(11)
 - exemption for, 212(9), (10)
- information returns, Reg. 204
- life, *see* Life estate in real property
- *pur autre vie*, *see* Life estate in real property
- return required, 150(1)(c)
- transfer of rights or things to beneficiaries, 70(3)

Estate administration tax, *see* Probate fees

Estate freeze, 86(1) (Notes)

Estate planning, *see also* Death of taxpayer

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

Estate tax

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

- Estimate of tax, required**, 151, *see also* Instalment payments (Instalments)
- Estimate of the expenses of survey**
- defined, Reg. 3600(2)
- Estimated annual taxable income**
- defined, Reg. 102(2)(c)
- Estimated deductions**
- defined, for source deductions, Reg. 100(1)
- Estonia**, *see also* Foreign government
- universities, gifts to, Reg. Sch. VIII, s. 25
- Euro**, *see* European Union: currency of
- European Bank for Reconstruction and Development**
- bonds of, qualified investment for RRSP etc., 204“qualified investment”(c.1) (formerly Reg. 4900(1)(l)(v))
 - no withholding tax on interest payable to, Reg. 806.1
- European Union**, *see also* Foreign government
- currency of, use as functional currency, 261(1)“qualifying currency”(b)
- Evasion of tax**, *see* Tax evasion, penalty for
- Evidence**, *see* Proof
- Examination fees for professional status**
- tuition credit, 118.5(1)(d)
- Excepted dividend**
- defined, 187.1
- Excepted gift**
- defined, 118.1(19)
 - donation to charity permitted, 118.1(13)
- Excess ALDA transfer**
- defined, 205(1)
 - tax on, 205(2)
- Excess amount (for registered education savings plan)**
- defined, 204.9(1), (2)
- Excess capacity**
- defined, for interest deduction restrictions, 18.2(1), 248(1)
- Excess corporate holdings percentage**
- defined, for private foundations, 149.1(1)
- Excess EPSP amount**, *see* Employees profit sharing plan: excess EPSP amount
- Excess FHSA amount**
- defined, 207.01(1)
 - tax on, 207.02
- Excess liquidity**
- defined, for FAPI of banks, 90(15), 95(2.43)
- Excess money purchase transfer**
- re past service event, Reg. 8303(7.1)
- Excess TFSA amount**
- defined, 207.01(1)
 - tax on, 207.02
- Excessive eligible dividend designation**
- defined, 89(1), 248(1)
- Excessive interest and financing expenses limitation (EIFEL)**
- alternative calculation, 18.21
 - limited to 30% of EBITDA, 18.2(2)B(b)
 - • exclusions, 18.2(1)“excluded entity”, “excluded interest”
 - • group ratio alternative, 18.21
 - • partnership add-back, 12(1)(1.2)
 - • windup, effect of, 88(1.1), (1.11)
- Exchange period**
- defined, for SIFT unwinding rules, 85.1(7)(a)
- Exchange rate**, *see also* Foreign currency
- defined, 111(8)
- Exchange share**
- defined, for SIFT unwinding rules, 85.1(7)(b)
- Exchange-traded fund**
- rules for allocation to redeemers, 132(5.31)
- Exchanges of property**
- amalgamation, effect of, 87(2)(1.3)
 - capital property, 44
 - corporation controlling or controlled by taxpayer, 44(7)
 - depreciable property, 13(4), (4.1)
 - leasing properties, 16.1(5)–(7)
 - non-qualifying security donated to charity, 118.1(15)
 - non-resident, 44(7)
- Exchanges of shares**, *see* Share
- Excise Tax Act**, *see also* Goods and services tax (GST)
- communication of information for enforcement of, 241(4)(d)(ii)
 - fuel tax rebate under, 12(1)(x.1)
 - GST included in taxable benefit, 6(7), 15(1.3)
 - input tax credit under, deemed to be government assistance, 248(16)–(18)
 - rebate under, deemed not to be reimbursement, 8(11)
 - tax payable under Part IX, 248(1)“goods and services tax”
- Excluded account**
- defined, for Common Reporting Standard, 270(1)
- Excluded acquisition or disposition**
- defined, for FAPI stub-period rules, 91(1.3)
- Excluded amount**
- re expenses of financing
 - • defined, 20(1)(e)(iv.1)
 - • no deduction, 20(1)(e)
 - re registered education savings plan
 - • defined, 146.1(7.2)
 - • excluded from income, 146.1(7.1)(b)
 - re split income
 - • defined, 120.4(1)
 - • excluded from income-splitting tax, 120.4(1)“excluded amount”
- Excluded benefits (re registered pension plan)**
- defined, Reg. 8303(5)(f)–(l), 8504(10)
 - excluded from normalized pension, Reg. 8303(5)
- Excluded building (re LNG liquefaction facility)**
- defined, Reg. 1104(2)
 - excluded from additional CCA, Reg. 1104(2)“eligible liquefaction building”
- Excluded business**
- defined, for income-splitting tax, 120.4(1)
- Excluded consideration**
- defined, re corporation attribution rules, 74.4(1)
 - excluded from attribution rules, 74.4(2)(f), 74.4(3)
- Excluded contribution (to registered pension plan)**
- defined, Reg. 8300(1)
 - excluded from pension credit, Reg. 8301(4)(a), 8301(5)(a), 8301(8)(e)
 - excluded from provisional PSPA, Reg. 8303(8)
- Excluded corporation**
- charities, non-qualified investment rules
 - • debt excluded from non-qualified investments, 149.1(1)“non-qualified investment”(a)(ii)
 - • defined, 149.1(1)“non-qualified investment”(d)–(f)
 - refundable investment tax credit
 - • defined, 127.1(2)
 - • excluded from additional credit, 127.1(2)“refundable investment tax credit”(a) pre-(f), 127.1(2.01)
- Excluded disposition**
- defined, 150(5)
 - does not require tax return to be filed, 150(1)(a)(i)(C), (D), 150(1.1)(b)(iii)
- Excluded dividend (for Part VI.1 tax)**
- defined, 191(1), 191(4)(d)
 - excluded from dividend allowance, 191.1(2)
 - excluded from “excepted dividend” for Part IV.1 tax, 187.1(d)
 - excluded from Part VI.1 tax, 191.1(1)(a)(i)–(iii)

Index

Excluded entity

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

Excluded equipment (re LNG liquefaction facility)

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

Excluded income

- defined, for FAPI rules, 92(2.5)

Excluded individual

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

Excluded interest

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

Excluded lease

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

Excluded MNE group

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

Excluded obligation

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

Excluded payment

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

Excluded period

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

Excluded personal property, *see* Excluded right or interest

Excluded platform operator

- defined, for digital platform operator reporting rules, 282(1)

Excluded policy

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

Excluded premium

- defined
- for Home Buyers’ Plan, 146.01(1)
- for Lifelong Learning Plan, 146.02(1)
- excluded from repayment of eligible amount
- Home Buyers’ Plan, 146.01(3)(a)
- Lifelong Learning Plan, 146.02(3)(a)

Excluded production (re Canadian film/video credit)

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

Excluded property

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

Excluded remuneration (re registered pension plan)

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

Excluded revenue

- defined, for FAPI rules, 92(2.5)

Excluded right or interest

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

Excluded security (for debt forgiveness rules)

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

Excluded seller

- defined, for digital platform operator reporting rules, 282(1)

Excluded share

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

Excluded shares

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

Excluded subsidiary entity

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

Excluded trust

- defined
- foreign reporting rules, 233.6(2)
- qualifying environmental trust rules, 211.6(1)
- shareholder benefit rules, 15(1.4)(d)

Excluded withdrawal

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

- Excluded withdrawal (*cont'd*)
- not taxable, 146(8), (8.01)
- Exclusive economic zone**
- application of legislation to, *Interpretation Act* 8(2.1)
 - defined, *Interpretation Act* 35(1)
 - SR&ED performed in, deemed performed in Canada, 37(1.3)
- Executive compensation repayment amount**
- defined, for Canada Emergency Wage Subsidy, 125.7(1)
 - repayment of part of wage subsidy, 125.7(14), (14.1)
- Executive remuneration**
- defined, 125.7(1)
- Executor**, *see also* Legal representative
- certificate required by, before distribution, 159(2)
 - deemed to be legal representative, 248(1)“legal representative”
 - obligations of, 159
 - return required by, 150(3)
 - withholding tax, liable for, 227(5), (5.1)(i)
- Exempt activity**
- for tobacco manufacturers’ surtax, 182(2)
 - defined, 182(2)
 - no surtax on, 182(2)“tobacco manufacturing”
- Exempt amount**
- defined, for non-resident trust rules, 94(1)
- Exempt capital gains balance (re flow-through entity)**
- after 2004, added to adjusted cost base, 53(1)(p)
 - defined, 39.1(1), (7)
 - used to reduce capital gain, 39.1(2)–(6)
- Exempt collective investment vehicle**
- defined, for Common Reporting Standard, 270(1)
- Exempt contribution (to TFSA)**
- defined, 207.01(2)
 - permitted, 207.01(1)“excess TFSA amount”A(b), 207.01(1)“unused TFSA contribution room”B(ii)
- Exempt corporation**, *see also* Exempt person
- becoming or ceasing to be exempt, 149(10)
 - capital dividend account, 89(1.2)
 - deemed disposition/acquisition of depreciable property, 13(7)(f)
 - loss carryover, restriction, 149(10)(c)
 - resource expenses, rules, 66.7(10)
 - defined, for CCUS climate risk disclosure, 211.93(1)
 - electronic filing not required, Reg. 205.1(2)(d)
 - Parts IV, IV.1, VI and VI not applicable, 227(14)
- Exempt deficit (of foreign affiliate)**
- defined, Reg. 5907(1)
- Exempt earned income**
- contribution of, to PRPP, 147.5(31)–(34)
 - defined, for pooled registered pension plan, 147.5(1)
- Exempt earnings (of foreign affiliate)**
- defined, Reg. 5907(1)
- Exempt foreign trust**
- defined, 94(1)
- Exempt gains balance**, *see also* Exempt capital gains balance (re flow-through entity)
- defined, 14(5) [before 2017]
 - effect of excessive election, 14(9) [before 2017]
- Exempt income**
- defined, 248(1)
 - under treaty, used in calculating clawback, Canada-U.S. Tax Treaty:Art. XXIV:10
- Exempt-income contribution amount**
- defined, for pooled registered pension plan, 147.5(1)
 - reduces unused RRSP deduction room, 146(1)“unused RRSP deduction room”B(iv)
- Exempt interest and financing expenses**
- defined, for interest deduction restrictions, 18.2(1)
- Exempt loan of transfer**
- defined, re loans to non-residents, 17(15)
- Exempt loss (of foreign affiliate)**
- defined, Reg. 5907(1)
- Exempt person**, *see also* Exempt corporation
- capital gains and losses, 40(2)(a)(i)
 - exchanges of property, determination of gain, 44(7)
 - for investments by deferred income plans
 - defined, Reg. 4901(2)“connected shareholder”B), 4901(2)“designated shareholder”A(ii)
 - for non-resident trust (NRT) rules
 - defined, 94(1)
 - excluded from NRT rules, 94(1)“contributor”, 94(1)“resident beneficiary”
 - no reserve for amount not due until later year, 20(8)
 - obligation issued at discount by, 16(2), (3)
 - partnership of, effect where taxable partner joins, 96(8)
 - sale of Canadian resource property by, 66.6
 - U.S. charitable organization, Canada-U.S. Tax Treaty:Art. XXI
- Exempt policy**
- defined, 12.2(11), Reg. 306
- Exempt property**
- for specified leasing property CCA rules
 - defined, Reg. 1100(1.13), (1.14)
 - excluded from specified leasing property, Reg. 1100(1.11)
 - for trusts’ 21-year deemed disposition rule
 - defined, 108(1)
 - excluded from deemed disposition, 104(4), (5), (5.2)
- Exempt service**
- defined, for non-resident trust rules, 94(1)
 - excluded from service being a deemed transfer of property, 94(2)(f)
- Exempt shares percentage**
- defined, for private foundations, 149.1(1)
- Exempt surplus (of foreign affiliate)**
- adjustment where gain deemed due to negative adjusted cost base, 93(1)(b)(ii)
 - deduction for dividend paid out of, 113(1)(a), Reg. 5900(1)(a)
 - defined, 113(1)(a), Reg. 5907(1)
 - portion of dividend deemed paid out of, Reg. 5900(1)(a)
- Exempt trust**
- defined, for FAPI rules, 95(1)
 - defined, foreign reporting rules, 233.2(1), *see also* Exempt foreign trust
- Exemption test policy**
- defined, Reg. 306(3)
- Exemption threshold**
- deemed capital gain on donation of flow-through share, 40(12)
 - defined, 54
- Exemption-end time**
- defined, for TFSA, 146.2(9)(a)
- Exemptions**, 81, 149, *see also* Grandfathering
- agricultural organizations, 149(1)(e), 149(2)
 - apportionment rule, 149(6)
 - Association of Universities and Colleges of Canada, 149(1)(h.1)
 - basic, re minimum tax, 127.53
 - benevolent or fraternal benefit society, 149(4)
 - limitation, 149(4)
 - benevolent society, 149(1)(k)
 - boards of trade, 149(1)(e), 149(2)
 - capital gains, 110.6, *see also* Capital gains deduction
 - chambers of commerce, 149(1)(e), 149(2)
 - charitable organization, 149(2)
 - compensation by Federal Republic of Germany, 81(1)(g)
 - Crown corporations, 149(1)(d)–(d.4)
 - exception, 27(1), (2)

Index

Exemptions (*cont'd*)

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

Existing guaranteed life insurance policy

- defined, 211(1)

Existing plan

- defined, Reg. 8500(1)

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

Expectation of profit

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

Expenditure, *see also* Expenses

- carbon capture, *see* CCUS tax credit
- defined

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

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

Expenses, *see also* Deductions in computing income

- advertising in non-Canadian periodicals etc., not deductible, 19
- advertising on non-Canadian broadcast media, not deductible, 19.1
- allowances for
- taxable, 6(1)(b)
- annual value of property, not deductible, 18(1)(d)
- appeal, of, 60(o)
- automobile of employee
- deductions allowed, 8(1)(j)
- depreciation, 13(11)
- away-from-home
- railway employee, 8(1)(e)
- borrowing money, 18(11), 20(1)(e), 21
- cancellation of lease, payment for, 20(1)(z), (z.1)
- limitation on deductibility, 18(1)(q)
- capital outlay, not deductible, 18(1)(b)
- clearing farm land, 30
- club dues, not deductible, 18(1)(l)(ii)
- commission agent's, 8(1)(f), 13(11)
- automobile or aircraft, 8(1)(j), 8(9)
- certificate of employer, 8(10)
- construction of building or ownership of land, 18(3.1)–(3.7)
- convention, 20(10)
- development, *see* Canadian development expense
- drilling and exploration, defined, 66(15)“drilling or exploration expense”
- election, tax credit for, 127(3)–(4.2)
- employee, of, 8(1), (2)
- employee's automobile or aircraft, 8(1)(j), 8(9)
- exploration, *see* Canadian exploration expense; Exploration and development expenses
- food, beverages, entertainment, *see* Entertainment expenses (and meals)
- general limitation, 67
- improving farm land, 30
- incurred to gain exempt income, not deductible, 18(1)(c)
- interest, 18(11), 20(1)(c), 20(3)
- borrowed money, on, 20(1)(c), 20(2)
- used to acquire land, 18(3)
- capitalization of, 21(1)
- compound, 20(1)(d)
- paid to acquire land, 18(2)
- paid to non-resident shareholder, 18(4)–(8)
- investigation of site, 20(1)(dd)
- “investment expense” defined, 110.6(1)
- issuing units, interests or shares, 20(1)(e)
- land drainage system, 30
- landscaping, 20(1)(aa)
- limitations on deductibility, 18(1)
- listing fee, 20(1)(g)
- meals, limitation, 8(4)
- medical, *see* Medical expenses
- mining taxes, 20(1)(v)
- moving, *see* Moving expenses
- objection or appeal, of, 60(o)
- performing duties of office or employment, deduction, 8(1)(i)
- personal or living, not generally deductible, 18(1)(h)
- personal services business, limitation re, 18(1)(p)
- prepaid
- amalgamation, on, 87(2)(j.2)

Expenses (cont'd)

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

Exploration and development expenses

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

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

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

Exploration and drilling rights

- dealers in, limitation, 66(5)

Export Development Canada

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

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

- defined, Reg. 8006

Express consent

- defined, Reg. 209(4)

Expropriation

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

Expropriation assets

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

Extended motor vehicle warranty

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

Extension of time

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

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

- defined, Reg. 5907(1.5)

FATCA, *see* Foreign Account Tax Compliance Act (U.S.)**FEDE, *see* Foreign exploration and development expenses****FHSA, *see* First Home Savings Account****FHSA carryforward**

- defined, 146.6(1)

FHSA deduction limit

- defined, 146.6(1)

FICT, *see* Fixed interest commercial trust**FIE, *see* Foreign investment entity****FIGE, *see* Financial institution group entity****FINTRAC, *see also* Financial Transactions and Reports Analysis Centre (FINTRAC)**

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

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

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

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

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

Failure to withhold tax, 227(8)

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

Fair market value

- charitable donation of property, limited to cost, 248(35)–(38)
- cultural property, donated, 118.1(10)
- deemed disposition at, *see* Disposition: deemed

Index

- Fair market value (*cont'd*)
 - defined, 69(1) (Notes)
 - ecological gift, 118.1(10.1)–(10.5)
 - certificate, 118.1(10.5)
 - inadequate considerations deemed to be, 69
 - exceptions re pre-1972 property, ITAR 32
 - inventory property, of, 10(1), (4)
 - meaning of, 69(1) (Notes)
 - property donated or contributed, limited to cost, 248(35)–(38)
 - property of deceased, 70(5.3)
 - publicly-traded securities held since before 1972, ITAR 26(11)
 - share
 - disposed of on death, 70(5.3)
 - foreign affiliate, of, ITAR 26(11.1), (11.2)
 - that is not capital property, 112(4.1)
 - transfer at, to spouse or minor, 74.5(1)
 - trust, capital interest in, 107.4(4)
 - held as inventory, 107(1.2)
 - trust for benefit of spouse, 70(8)(a)
 - undivided interest in property transferred by tax debtor, 160(3.1)
 - V-day election, Reg. 4700, Reg. Sch. VII
- Fair value amount**
 - defined, for alternative interest-deduction restrictions, 18.21(1)
- Fair value property**
 - defined, for mark-to-market rules, 142.2(1)
- Fairness package (1991)**, *see* Taxpayer relief
- False statement**, *see also* Penalty: false statement
 - defined, for third-party penalty, 163.2(1)
 - offence, 239(1), (1.1)
 - penalty, 163(2)
 - charity receipt, 188.1(9), (10)
 - third-party penalty, 163.2
- Family allowances**, *see* Canada Child Benefit
- Family Caregiver credit**
 - additional amount, 118(1)B(a)(ii)C(A), 118(1)B(b)(iv)D(A), 118(1)B(b.1)
 - base amount for infirm adult relative, 118(1)B(d)
- Family farm or fishing corporation/partnership**
 - capital gains exemption on disposition, 110.6(2), (31)
 - farm or fishing property leased to
 - transfer of, 70(9.8)
 - interest in partnership, defined, 70(10)“interest in a family farm or fishing partnership”
 - share of corporation, defined, 70(10)“share of the capital stock of a family farm or fishing corporation” 110.6(1)
 - transfer of
 - *inter vivos*, 73(4), (4.1)
 - on death, 70(9.2), (9.21), (9.3), (9.31)
 - to parent, 70(9.6)
- Family law**, *see* Province: laws of; Spouse
- Family Orders and Agreements Enforcement Assistance Act**
 - Canada Child Benefit payments not garnishable under, 122.61(4)(e)
 - disclosure of taxpayer information for purposes of, 241(4)(e)(vii)
- Family Support Plan**
 - payroll deduction reduces source withholding, Reg. 100(3)(d)
- Family Tax Cut (2014–15 only)**, 119.1
- Farm Income Protection Act**, *see also* Net income stabilization account; NISA Fund No. 2
 - payment received under, taxable, 12(1)(p)
 - information return, Reg. 234–236
 - premium paid under, deductible, 20(1)(ff)
- Farm land**, *see also* Farm or fishing property
 - addition to adjusted cost base, 53(1)(i)
 - improving, expenses deductible, 30
 - instalment on sale of, not considered payment from production, 12(1)(g)
- Farm loss**
 - amalgamation, on, 87(2.1)
 - defined, 111(8)“farm loss”, (9), 248(1)
 - determination of, by Minister, 152(1.1), (1.2), (1.3)
 - drought, due to, *see* Drought or flood region: prescribed
 - flood, due to, *see* Drought or flood region: prescribed
 - includes fishing loss, 111(8)“farm loss”A(a)(i)
 - limitation on deductibility, 111(3)
 - partnership, from, 96(1)
 - reassessment, 152(6)(c)
 - reduction of, on debt forgiveness, 80(3)(b)
 - restricted, 31(1), (1.1), *see also* Restricted farm loss
- Farm or fishing property**
 - disposition by partnership, 101
 - family farm or fishing corporation or partnership, transfer of, 70(9.2), (9.21)
 - investment tax credit, 127(9)“qualified property”(c)(ii)
 - leased, transfer of, 70(9.8)
 - qualified
 - capital gains exemption, 110.6(2)
 - defined, 110.6(1)
 - transfer of
 - from spouse’s trust, to children, 70(9.1), (9.11)
 - *inter vivos*, to child, 73(3), (3.1)
 - reserve, 44(1.1)
 - to farmer’s child, ITAR 26(18), (19)
 - on death, 70(9), (9.01)
 - to parent, 70(9.6)
- Farm quota**
 - capital gains exemption, 110.6(1)“qualified farm property”(d)
- Farm risks**
 - insurance of, 149(1)(t), 149(4.1)
- Farm support payments**, *see also* Farm Income Protection Act
 - defined, Reg. 234(2)
 - information slips for payments under, Reg. 234–236
- Farmer**
 - capital gain
 - principal residence, exclusion of, 40(2)(c)
 - cash method of computing income, 28(1)
 - instalments, 155
 - payments to, income, 12(1)(p)
 - transfer of farm property by, to child
 - *inter vivos*, 73(3), (3.1)
 - on death, 70(9), (9.01)
- Farming**
 - business
 - capital cost allowance (pre-1972 property), Reg. Part XVII
 - cash-base method of calculation, 28
 - ceasing to carry on, 28(4), (5)
 - expenses deductible, 30
 - inventory
 - acquisition of, 28(1.1)
 - valuation of, 28(1.2), (1.3), Reg. 1802
 - losses, deduction for
 - adjustment to cost base of land, 53(1)(i), 111(6)
 - partnership, disposition of land used in, 101, 111(7)
 - prepaid expenses, 28(1)(e), (e.1)
 - Canadian Wheat Board participation certificate, 161(5)
 - cooperative, small business deduction on sales to, 125(7)“specified cooperative income”
 - crop insurance, *see* Farm Income Protection Act
 - defined, 248(1)
 - drought, sales during, *see* Drought or flood region: prescribed
 - exempt from tobacco manufacturers’ surtax, 182(2)“exempt activity”(a)
 - farm loss, defined, 111(8)

Farming (cont'd)

- flood, sales during, *see* Drought or flood region: prescribed
- income deferred from destruction of livestock, 80.3
- inventory
 - acquisition of, 28(1.1)
 - amalgamation, on, 87(2)(b)
 - transfer to corporation, 85(1)(c.2)
 - valuation of, 28(1.2), (1.3), Reg. 1802
 - winding-up, on, 88(1.6)
- losses, deduction for, 31
- reduction in basic herd, 29(2)
- election re, 29(1)
- restricted farm loss, *see* Restricted farm loss
- stabilization payments and fees, 12(1)(p), 20(1)(ff)

Farming activities

- for carbon tax refund to farmers, 127.42(1)

Fax machine

- capital cost allowance, Reg. 1101(5p), Reg. Sch. II:Cl. 10(f)

Feasibility study

- re investigation of site, deductible, 20(1)(dd)

Federal body

- defined, Reg. 237(1)

Federal Court

- defined, *Federal Courts Act* s. 4
- registration of certificate re amount payable, 223(3)
- charge on land, 223(5), (6)

Federal Court of Appeal

- appeal to
 - Canadian amateur athletic association, revocation or refusal to register, 172(3)(a)
 - charity revocation or refusal to register, 172(3)(a.1)
 - DPSP, refusal to register, 172(3)(c)
 - from Tax Court, *Tax Court of Canada Act* ss. 17.6, 18.24
 - qualified donee revocation or refusal to register, 172(3)(a.2)
 - RESP, refusal to register, 172(3)(e)
 - RRIF, refusal to register, 172(3)(f)
 - RRSP, refusal to register, 172(3)(b)
- defined, *Federal Courts Act* s. 3
- proceedings in camera, 179

Federal credit union

- defined, 248(1)
- excluded from definition of “bank”, 248(1)“bank”
- provincial allocation of income, Reg. 404.1

Federal Crown corporation, *see* Crown corporation**Federal government, *see* Government****Federal-Provincial Fiscal Arrangements and Established Programs Financing Act**

- agreement under, 228

Federal sales tax

- refund of, taxable, 12(1)(x)(iv)

Federal sales tax credit, *see also* Goods and services tax (GST)**Fee, *see also* Fees**

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

Feeding oneself

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

Feedlot Health case overruled, 37(8)(a)(ii)(B)(II)**Fees**

- directors, 6(1)(c)
- included in income, 6(1)(c)

- investment counsel, 20(1)(bb)
- share transfer, deduction for, 20(1)(g)
- withholding tax, 153(1)(g)

Fees for an individual's tuition

- defined, 118.5(3)

Fellowship, *see* Scholarship**Fence**

- capital cost allowance for, Reg. Sch. II:Cl. 6
- in amusement park, CCA, Reg. Sch. II:Cl. 37

Ferrel case overruled, 120.4**Fertility treatment**

- medical expense credit, 118.2(2)(v)
- medical infertility not required, 118.2(2.2)
- surrogacy expenses, 118.2(2.21)

Festival organizer relief (COVID), Reg. 8901.1(2)(b)(xx)(A), *see also* Qualifying tourism or hospitality entity**Fiat currency**

- defined, for digital platform operator reporting rules, 282(1)

Fiat demerger spinoff, Reg. 5600(d)**Fibre-optic cable**

- capital cost allowance, Reg. Sch. II:Cl. 42(a)
- supporting equipment, Reg. Sch. II:Cl. 3(l)

Fiduciary, *see* Legal representative; Trustee**Field processing, *see* Canadian field processing****Fifth Supplement, *see* Revised Statutes of Canada, 1985 (5th Supp.)****Figuroa case responded to, 127(3.3) Notes****Filing deadlines, *see also* Deadlines**

- agreement to transfer forgiven amount (debt forgiveness rules), 80.04(6)(a), 80.04(7)
- annual returns, 150(1)
- claims for SR&ED
- deductions, 37(1), (8)
- investment tax credits, 127(9)“investment tax credit”(m)
- designation to flow out capital gains from trust, 104(21)–(21.03)
- discontinued business, Reg. 205(2)
- election to trigger capital gains exemption, 110.6(24)
 - revocation or amendment, 110.6(25), (27)
- expiring on Sunday or holiday, *Interpretation Act* s. 26
- extension by Minister, 220(3)
- information returns (T4, etc.), Reg. 205(1)
 - distribution from foreign trusts, 233.5(1)
 - foreign affiliates, 233.4(4)
 - foreign property, 233.3(3)
 - payments to non-residents, Reg. 202(7), (8)
 - registered pension plan, Reg. 8409
 - transfer of property to foreign trust, 233.2(4)
- interest offset applications, 161.1(3)(c)
- investment tax credit claims, 127(9)“investment tax credit”(m)
- preferred beneficiary election, 104(14)–(14.02)
- scientific research claims, 37(11), 127(9)“investment tax credit”(m)
 - no extension allowed, 220(2.2)
- section 85 rollover, 85(6), (7)
- tax returns, 150(1)

Filing-due date, 150(1)

- defined, 248(1)

Filing electronically, *see* Electronic filing**Film, *see* Motion picture film****Film agency**

- prescribed person for Canadian film/video tax credit, Reg. 1106(10)

Film credit, *see* Canadian film or video tax credit; Film or video production services credit

Index

- Film or video production services credit**, 125.5, *see also*
 - Canadian film or video tax credit
 - amalgamation of corporations, 87(2)(j.94)
 - refund of credit before assessment, 164(1)(a)(ii)
 - refundable credit, 125.5(3)
 - revocation of certificate, 125.5(6)
- Film property**
 - defined, for minimum tax purposes, 127.52(3)
- Filter**
 - air or water, medical expense credit, Reg. 5700(c.1)
- Finance comfort letters**, *see* Table of Comfort Letters
- Financial account**
 - defined, for Common Reporting Standard, 270(1)
- Financial account identifier**
 - defined, for digital platform operator reporting rules, 282(1)
- Financial accounts of non-residents**
 - reporting required, *see* Common Reporting Standard; *Foreign Account Tax Compliance Act*
- Financial aid**, *see* Assistance/government assistance; Reimbursement
- Financial asset**
 - defined, for Common Reporting Standard, 270(1)
- Financial difficulty (taxpayer in)**
 - debt forgiveness reserve for insolvent corporation, 61.3
 - replacement obligations, exemption from non-resident withholding tax, 212(3)
 - share, 248(1)“term preferred share”(e), *see also* Distress preferred share
- Financial institution**, *see also* Bank; Insurance corporation; Investment dealer; Moneylender; Restricted financial institution
 - accounting rule changes, transitional rules, 142.51
 - amalgamation of, 87(2)(g.2)
 - bad debt deduction, 20(1)(p)(ii)
 - becoming, 142.6(1)(a), (b)
 - ceasing to be, 142.6(1)(a), (c)
 - debt obligation owned by, *see* Specified debt obligation
 - defined
 - for charitable donations, 118.1(20)
 - for Common Reporting Standard, 270(1)
 - for financial institutions capital tax, 190(1)
 - for insurance corporations, Reg. 2400(1)
 - for Large Corporations Tax, 181(1)
 - for mark-to-market rules, 142.2(1)
 - for stop-loss rules, 112(6)(c), 142.2(1)
 - re disposition by financial institutions, Reg. 9200(1)
 - dividends received by
 - dividend deduction denied, 112(2.01)
 - mark-to-market property, effect on sale of share, 112(5)–(5.2)
 - ineligible for election to treat Canadian securities as capital property, 39(5)(b)
 - interference with remittance of tax, 227(5.2)–(5.4) (1995 draft, abandoned)
 - mark-to-market property, *see* Mark-to-market property; Specified debt obligation
 - non-resident, *see* Non-resident: financial institution
 - Part VI tax, 190–190.211
 - deductible in computing branch tax liability, 219(1)(h)(i)
 - instalments, 157(1)
 - rates, 190.1(1)
 - short taxation year, 190.1(2)
 - unused, reassessment re, 152(6)(e)
 - prescribed
 - for foreign affiliate rules, 95(2)(a.3), 95(2.5)“specified deposit”; Reg. 7900
 - remittance of tax through, 229 [repealed]
 - by large employers, required, 153(1), (1.4), Reg. 110
 - reserve for doubtful debts, 20(1)(l)(ii)
 - restricted, *see also* Restricted financial institution
 - • election by mutual fund/investment corporation to not be, 131(10)
 - • receiving dividends on taxable RFI shares
 - • • information return, 187.5
 - • • partnerships, 187.4
 - • • tax payable, 187.3(1)
 - • • time of acquisition of share, 187.3(2)
 - safety deposit box rented from, no deduction, 18(1)(l.1)
 - specified
 - defined, 248(1)
 - dividends received by, 112(2.1), (2.2)
 - guarantee agreement re shares, 112(2.2)–(2.22)
 - related corporations, 248(14)
 - superficial loss of, 18(13)–(16), 142.6(7)
 - transitional rules for accounting rule changes, 142.51
 - windup of, *see* Winding-up: financial institution
- Financial institution group entity**
 - defined, for interest deduction restrictions, 18.2(1)
- Financial instrument**
 - defined, for hybrid mismatch arrangement rules, 18.4(1)
- Financial intermediary corporation, defined**, 191(1)
- Financial Transactions and Reports Analysis Centre (FINTRAC)**
 - provision of charity information to, for security purposes, 241(9), (9.1)
- Financially dependent child or grandchild**, *see* Child: financially dependent
- Financing fees**
 - deduction for, 20(1)(e), (e.1)
 - election to capitalize, 21
- Financing lease**, *see* Direct financing lease
- Financing subsidy**
 - provided by employer, taxable, 6(23)
- Fine**
 - imposed for offence under ITA, *see* Offences
 - non-deductible, 67.6
- Finland**, *see also* Foreign government
 - stock exchange recognized, 262
- Fire alarm indicator**
 - visual, for the hearing impaired, medical expense credit, Reg. 5700(q.1)
- Firefighter**
 - killed in line of duty, tax-free benefit to families, 81(1)(j)
 - pension accrual to retire early, *see* Public safety occupation
 - vehicle of, deemed not to be automobile, 248(1)“automobile”(b.1)
 - volunteer
 - credit if performs 200 hours per year, 118.06(2)
 - employment income exemption, 81(4)
- First day of commercial operations**
 - defined, for CCUS knowledge sharing, 211.92(1)
- First Home Savings Account**, 146.6
 - administration fees, non-deductible, 18(1)(u)
 - carrying on business, 146.6(3)
 - holder jointly liable with FHSA for tax, 146.6(4)
 - conditions for, 146.6(2)
 - contribution to
 - attribution rules do not apply, 74.5(12)(d)
 - deduction for, 60(i), 146.6(5)
 - excess contribution, 207.01(1)“excess FHSA amount”, 207.021
 - • survivor subject to overcontributions tax, 207.022
 - • no deduction for interest on borrowed money, 18(11)(k)
 - death of holder, 146.6(1)“annual FHSA limit”(c)(ii), 146.6(13)–(15)
 - deduction for contribution to, 60(i), 146.6(5)

Index

- First Home Savings Account (*cont'd*)
 - deduction limit, 146.6(1)“FHSA deduction limit”
 - defined, 146.6(1), 248(1)
 - disposition of property to, capital loss nil, 40(2)(g)(iv)(A)
 - emigration of beneficiary, no deemed disposition, 128.1(10)“excluded right or interest”(e)(iii.1)
 - excluded from various trust rules, 108(1)“trust”(a)
 - exempt from tax, 146.6(3), 149(1)(u.4)
 - income inclusion from, 56(1)(z.6), 146.6(6), (9), (11), (14), (17)
 - investment counselling fees, non-deductible, 18(1)(u)
 - no tax on, 146.6(3), 149(1)(u.4)
 - overcontributions, 207.01(1)“excess FHSA amount”, 207.021
 - survivor subject to 207.021 overcontributions tax, 207.022
 - payment from
 - income inclusion, 56(1)(z.6), 146.6(6)
 - non-resident withholding tax, 212(1)(y)
 - withholding at source, 153(1)(v)
 - reversionary trust rules do not apply, 75(3)(a)
 - services in respect of, non-deductible, 18(1)(u)
 - tax on advantage, 207.05
 - tax on excess contributions, 207.021
 - survivor subject to 207.021 overcontributions tax, 207.022
 - tax on non-qualified investment or prohibited investment, 207.04(1)
 - transfer from
 - tax-free to FHSA, RRSP or RRIF, 146.6(7), (8)
 - taxable, 146.6(9)
 - withdrawals included in income, 146.6(6)
 - transfer to
 - capital loss deemed nil, 40(2)(g)(iv)(A)
 - from RRSP, 146(16)(a.2)
 - used as security for loan, 146.6(11)
 - withdrawals included in income, 146.6(6)
- First instalment base**
 - of corporation, 157(4), Reg. 5301(1)
- First Nations**, *see also* Indian
 - drinking water class action settlement, no tax, 81(1)(g.3)(i)(D)
- First Nations Tax**, *see also* Indian
 - federal credit for, 120(2.2)
 - instalments, 156.1(1)“net tax owing”(b)B, E, F, 156.1(1.3)
 - tax evasion offences, 239(5)
- First responders**
 - fallen in duty, tax-free benefit to families, 81(1)(j)
- First term shared-use-equipment, for R&D investment tax credit**
 - defined, 127(9)
- First-time donor**
 - defined, 118.1(1)
 - super-credit for charitable donations, 118.1(3.1), (3.2)
- First-time home buyer**
 - credit, *see* First-Time Home Buyer’s Credit
 - Home Buyer’s Plan eligibility, 146.01(1)“regular eligible amount”(e), (f)
- First-Time Home Buyer’s Credit and Disability Home Purchase Credit**, 118.05
 - amount of credit (\$1,500), 118.05(3)
 - apportionment among multiple claimants, 118.05(4)
- First-year rule, depreciable property**, Reg. 1100(2)–(2.4)
- Fiscal period**
 - business, of, 11(2)
 - change of control, on, 249(4)(d)
 - deemed end on emigration, 128.1(4)(a.1)
 - deemed end where exceeds 365 days, 249(3)(b)
 - defined, 249.1
 - not to be changed without CRA permission, 249.1(7)
 - partnership election to align with corporate partners, 249.1(8)–(11)
 - election for non-calendar year, 249.1(4), (5)
 - annual income inclusion where election made, 34.1
 - late filing, Reg. 600(b.1)
 - election on termination of proprietorship, 25
 - member of terminated partnership
 - election re, 99(2)–(4)
 - ending in a taxation year, 249(2)(b)
 - reference to, 249(2), (3)
- Fiscal year**
 - of MNE group, defined for country-by-country reporting, 233.8(1)
- Fisher**, *see* Fishing
- Fisherman**, *see also* Fishing
 - defined, Reg. 105.1(1)
- Fishing**
 - business
 - ceasing to carry on, 28(4), (5)
 - cash method, 28(1)
 - instalments required, 155
 - loss from, constitutes farm loss, 111(8)“farm loss”A(a)(i)
 - cod compensation, *see* compensation programs (*below*)
 - compensation programs
 - payments received under, taxable, 56(1)(a)(vi), Reg. 5502(c)
 - withholding of tax at source, 153(1)(m), Reg. 5502(c)
 - repayment of benefits, deductible, 60(n)(v)
 - cooperative, small business deduction on sales to, 125(7)“specified cooperative income”
 - defined, 248(1)
 - expedition, by CRA, 231.2(3)
 - family fishing corporation or partnership, *see* Family farm or fishing corporation/partnership
 - income from
 - election re source deductions, Reg. 105.1
 - instalments and payment of balance, 155
 - insurer exempt, 149(1)(t)
 - losses, 111(8)“farm loss”A(a)(i), *see also* Farm loss
 - not eligible for manufacturing & processing credit, 125.1(3)“manufacturing or processing”(a)
 - property
 - *inter vivos*, 73(3)–(4.1)
 - investment tax credit, 127(9)“qualified property”(c)(ii)
 - on death, 70(9)–(9.31)
 - transferred to child
 - when available for use, 13(27)(g)
 - quota, 110.6(1)“qualified fishing property”(d)
 - vessel
 - capital cost allowance, Reg. 1100(1)(i), 1101(2a), Reg. Sch. II:Cl. 7
 - leased to controlled corporation, investment tax credit, 127(9)“qualified property”(d)(iv)
 - defined, 248(1)
 - expedition, by CRA, 231.2(3)
 - family fishing corporation or partnership, *see* Family farm or fishing corporation/partnership
 - income from
 - election re source deductions, Reg. 105.1
 - instalments and payment of balance, 155
 - insurer exempt, 149(1)(t)
 - losses, 111(8)“farm loss”A(a)(i), *see also* Farm loss
 - not eligible for manufacturing & processing credit, 125.1(3)“manufacturing or processing”(a)
 - property
 - *inter vivos*, 73(3)–(4.1)
 - investment tax credit, 127(9)“qualified property”(c)(ii)
 - on death, 70(9)–(9.31)
 - transferred to child
 - when available for use, 13(27)(g)
 - quota, 110.6(1)“qualified fishing property”(d)
 - vessel
 - capital cost allowance, Reg. 1100(1)(i), 1101(2a), Reg. Sch. II:Cl. 7
 - leased to controlled corporation, investment tax credit, 127(9)“qualified property”(d)(iv)
- Fishing camps relief (COVID)**, Reg. 8901.1(2)(b)(xii), *see also* Qualifying tourism or hospitality entity
- Fishing charters relief (COVID)**, Reg. 8901.1(2)(b)(vi), *see also* Qualifying tourism or hospitality entity
- Fishing expedition**, 231.2(3)
- Fitness clubs relief (COVID)**, Reg. 8901.1(2)(b)(ix)(A)(I), *see also* Qualifying tourism or hospitality entity
- Fitness credit**, *see* Children’s Fitness Credit (pre-2017)
- Five full-time employees**, *see* Six employees test
- Fixed interest**, *see also* Specified fixed interest
 - defined
 - for loss restriction event rules for trusts, 251.2(1)
 - for non-resident trust rules, 94(1)
- Fixed interest commercial trust**
 - defined, for interest deduction restrictions, 18.2(1)
- Fixed location fuel cell systems or equipment**
 - capital cost allowance, Reg. Sch. II:Cl. 43.1(a)(ii.1)

Fixed payment obligation

- defined, Reg. 9100

Flared gas, *see* Solution gas**Flat benefit provision (of pension plan)**

- defined, Reg. 8300(1)

Flipped property (housing unit)

- deemed to be inventory and not capital property, 12(12)
- defined, 12(13)

Flood region, *see* Drought or flood region**Floorcovering installer**

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

Flow-through

- adjusted cost base of option, to share, partnership interest or trust interest, 49(3.01)
- Canadian development expense, to shareholder, 66(12.62)
- Canadian exploration expense, to shareholder, 66(12.6)
- Canadian oil and gas property expense, to shareholder, 66(12.64)
- corporate income to shareholder, *see* Integration
- corporation’s capital gain, untaxed portion, 83(2)
- death benefit, through trust or estate, 104(28)
- entity, *see* Flow-through entity (re capital gains exemption)
- intercorporate dividends, 82(1)(a), (a.1), 112(1)
- investment tax credits on windup, 88(1)(e.3)
- paid-up capital deficiency, on conversion of shares, 51(3), 86(2.1)
- partnership income to partner, 96(1)
- limited to amount at risk, 96(2.1)–(2.7)
- qualifying environmental trust income to beneficiary, 107.3(1)
- shares, *see* Flow-through shares
- trust capital gains to beneficiary, 104(21)
- trust income to preferred beneficiary, 104(14)
- trust pension benefits to beneficiary, 104(27)

Flow-through critical mineral mining expenditure

- defined, 127(9)
- reduction for assistance received, 127(11.1)(c.21)
- investment tax credit for, 127(5)(a)(i), 127(9)“investment tax credit”(a.21)
- carryforward or carryback, 127(9)“investment tax credit”(c)
- reduces CCEE, 66.1(6)“cumulative Canadian exploration expense”L

Flow-through entity (re capital gains exemption)

- adjusted cost base, addition to, 53(1)(p)
- amalgamation of, 87(2)(bb.1)
- defined, 39.1(1)
- distribution of property to beneficiary, 107(2.2)
- reduction in capital gain, 39.1(2)–(6)
- sale of interest in, 39.1(7)

Flow-through mining expenditure

- defined, 127(9)
- reduction for assistance received, 127(11.1)(c.2)
- investment tax credit for, 127(5)(a)(i), 127(9)“investment tax credit”(a.2)
- carryforward or carryback, 127(9)“investment tax credit”(c)
- reduces CCEE, 66.1(6)“cumulative Canadian exploration expense”L

Flow-through share class of property

- deemed capital gain on donation of, 40(12)
- defined, 54

Flow-through shares, 66(12.6)–(12.75)

- amalgamation, effect of, 87(4.4)
- COVID-19 extensions, 66(12.6001), (12.731), 211.91(2.1)
- class of property, *see* Flow-through share class of property
- cost of, 66.3(3)
- defined, 66(15), 248(1)
- donation to charity, deemed capital gain, 40(12)

- capital dividend account impact, 89(1)“capital dividend account”(a)(i)(A), (B.1)
- subsequent rollover, 38.1
- information return, Reg. 228
- interest on renunciation for previous year, 211.91(1)
- minimum tax, 127.52(1)(e), (e.1)
- mining exploration expenses in first 60 days of year, 66.1(8)
- not “tax shelter”, 237.1(1)
- oil, gas and coal eliminated as of April 2023, 66(12.6)(b.2)
- one-year look-back rule, 66(12.66)(a.1), 211.91
- paid-up capital, 66.3(4)
- prescribed, Reg. 6202.1
- renunciation of, 66(12.6), (12.62), (12.64), 66(12.73)
- Canadian development expenses
- conversion to CEE before 2019, 66(12.601), (12.602)
- Canadian exploration expenses, 66(12.6)
- Canadian oil and gas property expenses, 66(12.64)
- expenses in first 60 days of the year, 66(12.66)
- member of partnership, by, 66(19)
- mining properties excluded, 66(12.62)(b.1)
- restrictions, 66(12.67), (12.71), (19)
- selling instrument
- defined, 66(15)
- filing of, 66(12.68)
- late filing, 66(12.74), (12.75)

Fluctuations in currency, *see* Foreign exchange**Fondation**

- prescribed as labour-sponsored venture capital corporation, Reg. 6700(f), 6701(g)

Food, *see also* Entertainment expenses (and meals); Meals

- delivered after the end of the year, reserve for, 20(6)

Food and animal waste

- defined, Reg. 1104(13)

Food waste

- defined, Reg. 1104(13) [repealed]

Football players, *see* Athlete**Foreclosure**, *see* Surrender: of property to creditor**Foreign Account Tax Compliance Act (U.S.)**

- intergovernmental agreement for exchange of information, *see at end of Canada-U.S. Tax Convention*
- reporting required by Canadian financial institutions, 263–269
- information return of accounts held by U.S. persons, 266(1)
- records to be kept for 6 years, 267(3)
- U.S. taxpayer identifying number must be provided to financial institution, 162(6)

Foreign accrual capital loss

- application to FAPI, 95(1)“foreign accrual property income”F.1, Reg. 5903.1(1)
- defined, Reg. 5903.1(3), (4)

Foreign accrual property income, *see also* Foreign affiliate

- banks, rules for, 95(2.31), (2.43)–(2.45), (3.01)
- contract manufacturing, 95(3.2)
- currency hedging, 95(2)(g.01)
- defined, 95(1), 95(2), 248(1)
- definitions, 95(1), (4)
- foreign affiliate purchasing goods for use in Canada, 95(2)(a.1)
- fresh start rule, 95(2)(k)
- included in income, 91(1)
- insurance of risks in Canada, 95(2)(a.2)
- loss carryback, 152(6.1), Reg. 5903(1)(b)
- loss carryforward, Reg. 5903(1)(a)
- partnership, of, 93.1(5), (6)
- partnerships and trusts, 95(3.6)
- regulated foreign financial institution exception, 95(2.11)
- stub period, 91(1.1)–(1.5)
- transparent affiliate, Reg. 5907(1.091), (1.092)

Foreign accrual property loss

- carryback 3 years, Reg. 5903(1)(b)
- reassessment to permit, 152(6.1)
- carryforward 20 years, Reg. 5903(1)(a)
- defined, Reg. 5903(3)
- for interest deduction restrictions, 18.2(1)

Foreign accrual tax

- deduction from income, 91(4)
- defined
- for foreign accrual property income, 95(1)

Foreign affiliate, *see also* Controlled foreign affiliate; Foreign accrual property income

- absorptive merger of, 87(8.2)
- active business income, 95(2)(a), Reg. 5907(2)–(2.6)
- acquisition of shares of
 - from partnership, 91(7)
- assets acquired from
 - as consideration for settlement of debt, 80.1(5)
 - as dividend in kind, 80.1(4)
 - on winding-up, 80.1(6)
- becoming resident in Canada, 128.1(1)(d)
- benefit to shareholder from, 15(1)–(7), 90(6)–(15)
- capital gains
 - election re, Reg. 5902
- capital gains and losses, 95(2)(f)
- currency fluctuation, from, 95(2)(g)–(g.02)
- capital gains of, *see* Exempt surplus (of foreign affiliate); Hybrid surplus (of foreign affiliate); Taxable surplus (of foreign affiliate)
- capital loss of, *see* Foreign accrual capital loss
- carrying on business in a country, Reg. 5906
- consolidated groups' liabilities, Reg. 5907(1.1)
- controlled, defined, 95(1)“controlled foreign affiliate”
- currency dealings of, 95(2.3), (2.5)“indebtedness”
- deductible loss, 95(1)“foreign accrual property income”F, Reg. 5903
- defined, 95(1), 248(1)
 - look-through rule for shares held by partnership, 93.1
- definitions, Reg. 5907
- disposition of shares of
 - election re capital gains on, 93(1)
 - held by partnership, 93(1.2)
 - loss on, 93(2)–(2.3), (4)
 - share-for-share exchange, 85.1(3)–(6)
- disposition of shares of another foreign affiliate, 95(2)(c)
- dissolution of, 88(3)–(3.5), 95(2)(e), Reg. 5905(7)
- dividends from, 20(13), 113(1), Reg. 5900
 - shares held by partnership, 93.1(2)
- “earnings” of, defined, Reg. 5907(1)
- “excluded property”
 - debt related to, gain or loss on settlement of, 95(2)(i)
 - defined, 95(1)
 - “exempt earnings”
 - defined, Reg. 5907(1)
 - listed countries re, Reg. 5907(11)–(11.2)
 - “exempt loss”
 - defined, Reg. 5907(1)
 - listed countries re, Reg. 5907(11)–(11.2)
 - “exempt surplus” defined, Reg. 5907(1)
- foreign accrual property income of, defined, 95(1)
- “foreign accrual tax” defined, 95(1)
- hedge gain, stop-loss rule, 93(2)–(2.31)
- income bonds or debentures issued by, 95(5)
- income derived from indebtedness, 95(2)(a.3), 95(2.4), (2.5)“indebtedness”
- income from services, 95(2)(b)
 - “services” defined, 95(3)
- information return re, 233.4
- insurer

- income of, 95(1)“investment business”, 95(2)(a.2)
- subject to Canadian rules, 95(2)(k)(iv)
- investment business of, *see* Investment business
- liquidation of, 88(3)–(3.5), 95(2)(e), Reg. 5905(7)
- lower tier liquidation and dissolution, 95(2)(e)
- loan to, 17(3), 247(7)
- loan to shareholder by, 15(2)–(2.6), 90(6)–(15)
- merger of, 87(8), (8.1), 95(2)(d), (d.1)
- “net earnings” defined, Reg. 5907(1)
- “net loss” defined, Reg. 5907(1)
- “net surplus” defined, Reg. 5907(1)
- participating percentage, Reg. 5904
- partnership interest
 - adjusted cost base of, 95(2)(j)
- qualifying interest in, *see* Qualifying interest (in respect of foreign affiliate)
- regulations, Reg. Part LIX
- “relevant cost base” of property, 95(4)
- “relevant tax factor” defined, 95(1)
- reporting requirements, 233.4
- residence of, Reg. 5907(11.2)
- return of capital, Reg. 5901(2)(b)
- second affiliate, 95(2)(a)(ii)(D)
- settlement of debt, gain or loss from, 95(2)(i)
 - share of
 - adjusted cost base, 92
 - amalgamation, on, 87(2)(u)(i)
 - amount included in income re, 91(1)
 - reserve where foreign exchange restriction, 91(2)
 - disposition of, 85.1(3)–(6)
 - held by partnership, 93(1.2)
 - election re disposition, 93(1), (1.1), (1.11)
 - late-filed, 93(5)
 - penalty, 93(6)
 - special cases, 93(5.1)
 - unpaid balance of penalty, 93(7)
 - exempt dividends, 93(3)
 - on amalgamation, 87(2)(u)(ii)
 - fair market value, ITAR 26(11.1), (11.2)
 - held by partnership, 93.1(2)
 - issued to avoid tax, deemed not issued, 95(6)(b)
 - loss limitation on disposition of, 93(2)–(4)
 - participating percentage of, defined, 95(1)“participating percentage”
 - special rules, Reg. 5905
 - start-up rule, for non-active business, 95(2)(k)
 - stock dividends from, 95(7)
 - surplus distributions
 - how taxed, 113(1)
 - order, Reg. 5901
 - “surplus entitlement percentage” defined, 95(1)
 - tax, *see* Foreign taxes
 - “taxable earnings” defined, Reg. 5907(1)
 - “taxable loss” defined, Reg. 5907(1)
 - “taxable surplus” defined, Reg. 5907(1)
 - taxation year, 95(1)
 - taxpaying affiliates' losses, Reg. 5907(1.2)
 - third affiliate, 95(2)(a)(ii)(D)
 - windup of, distribution of property, 88(3)

Foreign affiliate dumping, 212.3

- corporate emigration, 219.1(2)
- corporate immigration, 128.1(1)(c.3)

Foreign assets

- reporting of, to CRA, 233.3

Foreign bank, *see also* Authorized foreign bank

- defined
 - re FAPI, 95(1)
- fund deposited with, reporting requirement, 233.3

Foreign-based information or document

- defined, 231.6(1)
- requirement to provide, 231.6(2)
- consequence of non-compliance or incomplete compliance, 231.6(8)
- notice of, 231.6(3)
- review of, 231.6(4)–(6)
- time during review not to count, 231.6(7)
- tax shelter investment, effect on, 143.2(13), (14)

Foreign broadcasting undertaking

- defined, 19.1(4)
- no deduction for advertisement broadcast to Canadian market by, 19.1(1)

Foreign business

- defined, for FAPI rules, 95(2)(j.1)(v), 95(2)(k.1)

Foreign business corporation

- deemed resident in Canada, 250(4)(b)
- defined, 213(3)
- no withholding tax on dividend from, 213(1)

Foreign charitable organization

- designation of, for donations to qualify, 149.1(26)

Foreign charity

- qualifying for Canadian donations
- charity that received gift from Canada, 149.1(1)“qualified donee”(a)(v), 149.1(26)
- US charity, where donor has US-source income, Canada-U.S. Tax Treaty:Art. XXI:7
- US charity, no Canadian tax on, Canada-U.S. Tax Treaty:Art. XXI:1

Foreign corporation, see Foreign affiliate; Non-resident**Foreign country, see Foreign government; Foreign investment entity; Prescribed countries****Foreign currency, see also Foreign exchange**

- defined, 248(1)
- election to use for tax reporting, 261(3)

Foreign currency debt

- defined, 111(8), 248(1)
- gain or loss on, after change of control, 40(10), (11), 111(12), (13)

Foreign deduction component

- defined, for hybrid mismatch arrangement rules, 18.4(7)(b), 18.4(11)(c), 18.3(13)(c), 18.4(15)(b)

Foreign divisive reorganization

- effect on shareholders, 15(1.5)

Foreign exchange, see also Foreign currency

- adjustment, re specified debt obligation, Reg. 9104
- calculating currency defined, 95(1)
- calculation of income where foreign assets expropriated, 80.1(8)
- change of control of corporation, effect of, 111(12), (13)
- debt obligation denominated in
 - application of debt forgiveness rules, 80(2)(k), 80.01(11)
 - assumed by non-resident in Canadian business, 76.1(2)
 - moved by non-resident from Canadian business, 76.1(1)
 - surrender of property to creditor, calculation of proceeds, 79(7)
- exchange rate defined, 111(8), 248(1)
- fluctuations in
 - capital gain or loss, 39(1.1), (2)
 - debt parking and statute-barred debt rules to be ignored, 80.01(11)
 - foreign affiliate’s capital gain or loss from, 95(2)(g)–(g.02)
 - ignored in determining employee stock option deduction, 110(1)(d)(iii)
 - loan or lending asset, 248(1)“amortized cost”(c.1), (f.1)
 - revenue to real estate investment trust, 122.1(1.3)
 - specified debt obligation of financial institution, 142.4(1)“tax basis”(f), (o)

- income in blocked currency, waiver of interest on tax, 161(6)
- restriction, reserve where, 91(2), (3)

Foreign expense restriction rule

- defined, for hybrid mismatch arrangement rules, 18.4(1), 113(3)

Foreign exploration and development expenses, see also Exploration and development expenses; Resource expenses

- borrowed money
- capitalization of interest, 21(2), (4)
- reassessment, 21(5)
- country-by-country allocation, 66(4.1), (4.2)
- successor rules, 66.7(2.1), (2.2)
- deduction for, 66(4)
- short taxation year, 66(13.1)
- defined, 66(15)
- individual ceasing to be resident in Canada, 66(4.3)
- limitation, 66(12.4)
- reduction of, on debt forgiveness, 80(8)(e)
- short taxation year, 66(13.1)
- specified, *see* Specified foreign exploration and development expense
- successor corporation, rules, 66.7(2)
- application, 66.6(1)

Foreign government, see also United States

- bonds of, eligible for RRSP investment, 204“qualified investment”(c.1) (formerly Reg. 4900(1)(o))
- bribery of officials non-deductible, 67.5
- diplomats, exempt, 149(1)(a), Canada-U.S. Tax Treaty:Art. XXVIII
- employees of, exempt, 149(1)(a), Canada-U.S. Tax Treaty:Art. XIX, XXVIII
- expropriation by, 80.1
- social security plan of, excluded from RCA, Reg. 6802(g)
- stock exchanges recognized, 262
- tax paid to, *see* Foreign tax credit; Foreign taxes

Foreign hybrid mismatch rule

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

Foreign immigration trust, see Immigration trust**Foreign income, see also Foreign accrual property income**

- Canadian resident, generally taxable, 3(a)
- employment, tax credit for (pre-2016), 122.3
- foreign affiliate, of, *see* Foreign accrual property income
- non-resident, not taxable, 115(1)
- taxed by foreign country, *see* Foreign tax credit

Foreign insurance subsidiary

- defined, Reg. 8605(4)

Foreign investment entity, 94.1–94.4 [former draft, not implemented]**Foreign investment income**

- defined, 129(4)
- refund to private corporation in respect of, 129(1), (3)

Foreign merger

- absorptive merger, 87(8.2)
- defined, 87(8.1)
- effect of, 87(8)
- taxable Canadian property rollover, 87(8.4), (8.5)

Foreign Missions and International Organizations Act

- employment income from international organization, tax credit, 126(3)

Foreign mutual fund trust

- exemption from reporting requirement, 233.2(1)“exempt trust”(c)
- reporting requirement, 233.3

Foreign non-profit organization

- defined, Reg. 6804(1)

Foreign oil and gas business

- defined

Foreign oil and gas business (*cont'd*)

- for foreign tax credit, 126(7)
- for FAPI, Reg. 5910(4)
- foreign tax credit for, 126(5)

Foreign ordinary income

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

Foreign plan (pension plan)

- contributions made to, Reg. 6804(4)–(6)
- defined, Reg. 6804(1), 8308.1(1)
- electing employer with respect to, Reg. 6804(2), (3)
- PSPA of, Reg. 8308.1(5), (6)
- information return, Reg. 8402(2)
- pension adjustment, prescribed amount, Reg. 8308.2
- pension credit of, Reg. 8308.1(2)–(4)

Foreign policy loan

- defined [repealed], Reg. 2400(1)

Foreign policy pool

- defined, for FAPI on insurance swaps, 95(2)(a.21)

Foreign property, *see also* Foreign reporting requirements

- investments in, annual information return, 233.3
- sale of, expropriation assets for, 80.1

Foreign reporting requirements, 233.1–233.7

- foreign affiliates, 233.4
- foreign property, 233.3
- reassessment deadline extended if return not filed accurately, 152(4)(b.2)
- foreign trusts
 - distributions from, 233.5
 - indebtedness to, 233.5
 - transfer of property to, 233.3
- transactions with related non-residents, 233.1

Foreign resource expenses

- defined, 66.21(1)
- reduction of, on change of control, 66.7(13)
- specified amount of, for successor rules, 66.7(13.2)
- successor of, 66.7(2.3), (13.1)

Foreign resource income

- defined, 66.21(1)

Foreign resource loss

- defined, 66.21(1)

Foreign resource pool expense

- deduction against taxable income earned in Canada, 115(4.1)
- defined, 248(1)

Foreign resource property

- acquisition of, rules, 66.7(8)
- amount designated re
 - “outlay” or “expense”, 66(15)
- defined, 66(15), 248(1)
- disposal of, effect on successor rules, 66.7(15)
- disposition of, 59(1)
 - by partnership, 59(1.1)
 - no capital gain, 39(1)(a)(ii.1)
 - no capital loss, 39(1)(b)(ii)
- “eligible property” for transfer to corporation by shareholder, 85(1.1)(d)
- eligibility for section 85 rollover, 85(1.11)(a)
- in respect of a country, defined, 248(1)
- non-successor acquisitions, 66.7(16)
- original owner, defined, 66(15)
- predecessor owner, defined, 66(15)
- proceeds of disposition, 59(1)
- production from, defined, 66(15)“production”
- reserve amount, defined, 66(15)
- rules for trusts, 104(5.2)
- seizure of, exception to creditor rules, 79.1(2.1)
- successor rules, 66.7(15)

Foreign retirement arrangement

- amount credited to, exempt, 81(1)(r)
- benefit to trust, flow-through to beneficiary, 104(27)
- defined, 248(1), Reg. 6803
- eligible amount, 60.01
- emigration of retiree, no deemed disposition, 128.1(10)“excluded right or interest”(a)(x)
- excluded from reporting requirements, 233.2(1)“exempt trust”(a), 233.3(1)“specified foreign property”(n), 233.5(2)(a)
- excluded from various trust rules, 108(1)“trust”(a)
- income earned in account, exempt, 81(1)(r)
- Individual Retirement Account (U.S.), Reg. 6803
- lump-sum transfer, 60(j)(ii), 60.01
- payment out of
 - eligible for transfer to RRSP, 60(j)(ii), 60.01
 - included in income, 56(1)(a)(i)(C.1)
- prescribed plan or arrangement, Reg. 6803

Foreign service

- for registered pension plan
 - determination of provisional PSPA, Reg. 8303(10)
 - eligibility, 8503(3)(a)(vii)

Foreign share

- rollover on exchange for foreign share, 85.1(5), (6)

Foreign spin-off, 86.1

- foreign accrual property income, 95(2)(g.2)
- prescribed distribution, Reg. 5600

Foreign stock exchange index units

- prescribed distribution, Reg. 5600
- qualified for deferred income plans, Reg. 4900(1)(n.1)

Foreign stock exchanges, 262**Foreign tax credit**, 126

- addition to taxable income in respect of, 110.5
- change in, reassessment within 6 years, 152(4)(b)(iii)
- deduction for specified capital gains, and, 126(5.1)
- deduction from income, 20(11), (12), (12.1), 91(4)
- deduction from tax, 126
 - calculated separately for each foreign country, 126(6)
 - definitions, 126(7)
 - emigrant, 126(2.21)
 - non-resident, re pre-Oct/96 disposition, 126(2.2)
 - trust with non-resident beneficiary, 126(2.22)
- deemed tax on income or profits, 126(5)
 - definitions, 126(7)
 - employees profit sharing plan, deduction, 144(8.1)
 - foreign oil and gas levies, 126(5)
 - former resident, 126(2.21)
 - trust beneficiary, 126(2.22)
 - minimum tax, 127.54
 - no economic profit, 20(12.1), 126(4.1)
 - non-business income tax, 20(12)
 - not deductible by life insurer, 138(5.1), (8)
 - overseas employment tax credit and, choice between, 126(1)(b)(i)
 - payable, adjustment, 161(6.1)
 - portion of foreign tax excluded, 126(4)
 - profit not material, 20(12.1), 126(4.1)
 - short-term securities acquisitions, 126(4.2), (4.3)
 - special, for minimum tax purposes, 127.54
 - tax deemed income or profits tax, 126(5)
 - trust, deduction for, 104(22)–(22.4)
 - U.S. estate taxes, Canada-U.S. Tax Treaty:Art. XXIX-B:6, (7)
 - unused
 - carryover on amalgamation, 87(2)(z)
 - defined, 126(7)“unused foreign tax credit”
 - overpayment of tax as consequence of, 164(5), (5.1)
 - reassessment, 152(6)(c.1)
 - rules re, 126(2.3)

Foreign taxation year

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

Foreign taxes

- additional, or reimbursement of
- reassessment within 6 years, 152(4)(b)(iv)
- credit for, *see* Foreign tax credit
- deduction for, 20(11), (12), (12.1)

Foreign trust, *see* Offshore trust; Trust (or estate): non-resident

Forest

- access road, capital cost allowance, Reg. Sch. II:Cl. 10(p)
- management plan, prescribed, Reg. 7400

Forestry professional, recognized, Reg. 7400(2)

Forestry Revitalization Trust

- remission of tax payable on, *British Columbia Forestry Revitalization Remission Order*

Forfeited amount

- defined, 147(1), Reg. 8500(1)

Forfeiture

- under deferred profit sharing plan, 201

Forgiven amount (re settlement of debt)

- deemed where amount designated following debt forgiveness, 80.03(7)(b)(ii)
- defined, 15(1.21), 80(1), 80.01(1), 80.03(1), 80.04(1)
- transfer of, under agreement, 80.04(4)

Forgiveness of debt, *see* Debt forgiveness

Form vs substance, for GAAR, 245(4.1)

Form(s)

- prescribed or authorized
- defined, 248(1)“prescribed”
- deviations acceptable, *Interpretation Act* s. 32
- proof of, 244(16)
- waiver of requirement to file, 220(3.1)

Former Act (pre-1972), references to

- defined, ITAR 8

Former business property

- amalgamation, effect of, 87(2)(1.3)
- defined, 248(1)
- disposition of, 44(1), (6)

Former employee

- amount received from employer, whether taxable, 6(3)
- of predecessor employer, for pension plan rules, 147.2(8)
- stock option agreement, taxable benefit, 7(4)

Former limit

- defined, 147.1(1)

Former limited-recourse indebtedness (tax shelter investment)

- defined, 143.2(10)

Former property, *see also* Exchanges of property; Former business property

- defined, 13(4), 44(1)

Former resident, *see also* Ceasing to be resident in Canada

- credit for tax paid on emigration where stop-loss rule applies, 119
- reassessment to permit credit, 152(6.3)
- foreign tax credit, 126(2.21), (2.22)
- returning to Canada, 128.1(6), (7)
- stop-loss credit, 119
- reassessment to permit credit, 152(6.3)

Former spouse, defined, 252(3)

Formulas

- negative amounts in, 257

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

- addition to tax, 120.1(2) [repealed]
- election, 110.4(2) [repealed]

Forward purchase or sale agreement

- deemed to be eligible derivative subject to mark-to-market election, 10.1(4)
- excluded from inventory writedown, 10(15), 18(1)(x)
- straddle transaction restrictions, 18(17)“position”(a)(vi), 18(9)

Forward rate agreement

- deemed to be eligible derivative subject to mark-to-market election, 10.1(4)
- excluded from inventory writedown, 10(15), 18(1)(x)
- straddle transaction restrictions, 18(17)“position”(a)(vi), 18(9)

Fossil fuel

- defined, Reg. 1104(13)

Fossilized shellfish, *see* Ammonite gemstone

Foster child

- payment relating to, exempt, 81(1)(h)

Foster’s-Treasury Wine spinoff, Reg. 5600(e)

Foundation, *see* Charitable foundation; Private foundation; Public foundation

Fractional share

- cash received for by trust, 107.4(2.1)
- is a share, 248(1)“share”

France, *see also* Foreign government

- stock exchange recognized, 262
- universities, gifts to, Reg. Sch. VIII, s. 3

Franchise

- capital cost allowance, Reg. 1100(1)(c), Reg. Sch. II:Cl. 14
- payment to U.S. resident on connection with, Canada-U.S. Tax Treaty:Art. XII:3(c)
- relationship not considered control, 256(5.1)
- representation expenses, 13(12), 20(1)(cc), 20(9)

Fraser Papers Inc.

- pension underfunding trust, Reg. 6802(h)(ii), 8502(b)(v.1)

Fraternal benefit society/order

- exemption, 149(1)(k)

Fraud, justification for reassessment, 152(4)(a)(i), 152(5)

Fraudulent conveyance

- tax equivalent to provincial legislation, 160

Fredette case overruled, 34.2, 245(4)

Freedom of information, 241(1) (Notes)

Freight haulage trucks and tractors

- capital cost allowance, Reg. Sch. II:Cl. 16(g)

Fresh-start date

- defined, for donation of flow-through shares, 54

Freshwater Fish Marketing Corporation, subject to tax, 27(2), Reg. 7100

Friesen case overruled, 10(1.01)

Frivolity penalty

- where appeal filed to delay payment, 179.1

Frontier exploration

- allowances, Reg. 1207
- prescribed area, Reg. 1215

Frontier exploration base

- defined, Reg. 1207(2)
- expenses added to
- amounts receivable, portion included in income, 59(3.3)(e)

Fruit growing, constitutes farming, 248(1)“farming”

Fuel

- production of, 66(15)“principal-business corporation”(h)

Fuel cell systems

- fixed-location, capital cost allowance, Reg. Sch. II:Cl. 43.1(a)(ii.1), Sch. II:Cl. 43.1(d)(xii)

Fuel tax rebate (1992–1999)

- 10 × inclusion, 12(1)(x.1)
- abatement of prior years’ losses, 111(10), (11)
- amalgamation, on, 87(2)(uu)

- Fuel tax rebate (1992–1999) (*cont'd*)
- interest on prior year's return not to be paid, 161(7)(a)(viii)
 - windup, on, 88(1)(e.2)
- Fuel upgrading equipment**
- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(ix), Sch. II:Cl. 43.2(b)
- Full-rate taxable income**
- defined, 123.4(1)
- Full-time student**
- defined, for Lifelong Learning Plan, 146.02(1)
- Fully collateralized arrangement**
- defined, 248(1)
- Fully exempt interest**
- defined, 212(3)
 - exempt from non-resident withholding tax, 212(1)(b)(i)
- Functional currency**
- defined, 261(1)
 - election to use, 261(3), (5)
 - • electronic filing not required, Reg. 205.1(2)(c)
 - rules, 261
- Functional currency year**
- defined, for functional currency rules, 261(1)
- Fund value benefit**
- under life insurance policy, defined, Reg. 310, 1401(3)
- Fund value of a coverage**
- under life insurance policy, defined, Reg. 310, 1401(3)
- Fund value of a policy**
- defined, Reg. 1401(3)
- Funder**
- defined, for back-to-back shareholder loan rules, 15(2.192)
- Funding arrangement**
- defined, for back-to-back shareholder loan rules, 15(2.192)
- Funds**
- defined, for electronic funds transfer reporting, 244.1
- Funeral and burial expenses benefit**
- paid to Canadian Forces member or veteran, exempt, 81(1)(d.1)(vii)(H)
- Funeral or cemetery services, *see also* Eligible funeral arrangement**
- defined, 148.1(1)
 - provision of under eligible funeral arrangement, 148.1(2)(b)(i)
- Funeral services, *see also* Eligible funeral arrangement**
- defined, 148.1(1)
 - provision of under eligible funeral arrangement, 148.1(2)(b)(i)
- Fur farming, 248(1)“farming”**
- Furnace**
- electric or sealed combustion, medical expense credit, Reg. 5700(c.2)
- Furniture**
- antique, whether CCA allowed, Reg. 1102(1)(e)
 - capital cost allowance, Reg. Sch. II:Cl. 8(i)
- Future benefits to be provided**
- under life insurance policy, defined, Reg. 1401(3)
- Future net premiums or cost of insurance charges**
- re life insurance policy coverage, defined, Reg. 1401(3)
- Future premiums or cost of insurance charges**
- re life insurance policy coverage, defined, Reg. 1401(3)
- Future obligations, *see also* Reserve**
- deduction for amount paid, 20(24)
- Futures agreement**
- deemed to be eligible derivative subject to mark-to-market election, 10.1(4)
 - excluded from inventory writedown, 10(15), 18(1)(x)
 - straddle transaction restrictions, 18(17)“position”(a)(vi), 18(9)
- G**
- GAAP, *see* Generally accepted accounting principles**
- GAAR, *see* General anti-avoidance rule**
- GANBI, *see* Group adjusted net book income**
- GILTI, *see* United States: global intangible low-taxed income**
- GIS, *see* Guaranteed Income Supplement, included in income**
- GNIE, *see* Group net interest expense**
- GRE, *see* Graduated rate estate**
- GRIP, *see* General rate income pool**
- GSRA, *see* Government-sponsored retirement arrangement**
- GST, *see* Goods and services tax (GST)**
- GST/HST Credit, *see* Goods and services tax: refundable credit**
- Gagnon case overruled, 56(12)**
- Gains, *see also* Capital gain; Capital loss; Capital gains and losses**
- defined, for disposition of specified debt obligation, Reg. 9200
- Gala presentation**
- ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(v)
 - ineligible for film/video production services credit, Reg. 9300(2)(e)
- Gallantry Awards Order Statute**
- amount received under, exempt, 81(1)(d)
- Gallium, *see* Critical mineral**
- Gambling losses, Canada-U.S. Tax Treaty:Art. XXII:3**
- Game show**
- ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(iii)
 - ineligible for film/video production services credit, Reg. 9300(2)(c)
- Garnishment for taxes unpaid, 224**
- binding on federal and provincial governments, 224(1.4)
 - enhanced, 224(1.2)
 - failure to comply with order, 224(4), (4.1)
 - prevented while objection or appeal underway, 225.1
 - salary or wages, 224(1)
 - “super” garnishment priority over secured creditors, 224(1.2)
- Garry Bowl Ltd. case overruled, 152(1.1)**
- Gas, natural, *see* Petroleum/natural gas**
- Gas manufacturing/distributing equipment**
- capital cost allowance, Reg. Sch. II:Cl. 1(n), Sch. II:Cl. 2(d)
- Gas or oil well equipment, Reg. 1104(2), Reg. Sch. II:Cl. 10(j)**
- Gaseous biofuel**
- defined, Reg. 1104(13)
- Gasoline expense**
- automobile, *see* Automobile: operating costs
- Gaspé Peninsula**
- defined, 127(9)
 - prescribed area, for electrical energy or steam processing, 127(9)“qualified property”(c.1)
 - prescribed designated region, 127(9)“specified percentage”(a)(vi), Reg. 4607
 - qualified property acquired for use in, 127(9)“specified percentage”(a), (e)
- Gay couples, *see* Common-law partner**
- Gemstones, *see also* Listed personal property**
- ammonite, *see* Ammonite gemstone
- General amending provision**
- of insurance policy, defined [repealed], Reg. 1408(1)
- General anti-avoidance rule, 245**
- application of rule, 245(2), (4)
 - • application to tax treaties, 245(4)(a)(iv), *Income Tax Conventions Interpretation Act* s. 4.1
 - avoidance transaction, defined, 245(3)

Index

- General anti-avoidance rule (*cont'd*)
 - determination of amounts following assessment, 152(1.11), (1.12)
 - determination of tax consequences, 245(5)
 - economic substance test, 245(4.1)
 - penalty when GAAR applies, 245(5.1)
 - preamble stating purpose of GAAR, 245(0.1)
 - reassessment deadline extended 3 years, 152(4)(b)(viii)
 - tax benefit, defined, 245(1)
 - tax consequences, defined, 245(1)
 - transfer pricing GAAR test, 247(2)(b)(ii)
- General corporate income tax rate**
 - defined, for provincial SIFT tax rate, Reg. 414(1)
- General Motors of Canada Limited**
 - payments to, exception to employee life and health trust rules, Reg. 9500
- General procedure appeals**, 175
- General provisions**
 - defined, Reg. 8006
- General-purpose electronic dataprocessing equipment**
 - capital cost allowance, Reg. Sch. II:Cl. 50
 - defined, Reg. 1104(2)
- General rate factor**
 - defined, for GRIP calculation, 89(1)
- General rate income pool**
 - after amalgamation, 87(2)(vv), 89(5)
 - after windup, 89(6), 88(1)(e.2)
 - defined, 89(1), 248(1)
 - addition for 2006, 89(7)
 - addition on amalgamation, 89(5), 87(2)(vv)
 - addition on becoming CCPC, 89(4)
 - addition on windup, 89(6), 88(1)(e.2)(ix), 87(2)(vv)
 - dividend paid from, 89(1)“eligible dividend”, “excessive eligible dividend designation”
- General rate reduction percentage**
 - defined, 123.4(1)
 - application to manufacturing & processing credit, 125.1(1), (2)
- Generally accepted accounting principles**
 - in computing income from business or property, 9(1)
 - in determining adjusted equity, 20.2(2)
 - modified for foreign bank branches, 20.2(1)“branch financial statements”
- Generating electrical energy**
 - manufacturing and processing credit, 125.1(2)
- Generating equipment**
 - capital cost allowance, Reg. 1100(1)(t), (ta), Reg. Sch. II:Cl. 1(k), Sch. II:Cl. 1(m), Sch. II:Cl. 2(a), Sch. II:Cl. 2(c), Sch. II:Cl. 8(f), Sch. II:Cl. 8(g), Sch. II:Cl. 9(a), Sch. II:Cl. 9(e), Sch. II:Cl. 9(f), Sch. II:Cl. 17(a.1), Sch. II:Cl. 29
- Genstar trusts**
 - anti-avoidance rule, 104(7.1)
- Geothermal energy projects**
 - Canadian renewable and conservation expense, Reg. 1219(1)(f)(ii), 1219(1)(h)
 - clean-energy CCA, Reg. Sch. II:Cl. 43.1(d)(viii)
 - compliance required with environmental law, Reg. 1104(17), 1219(5)
- Germany**, *see also* Foreign government
 - compensation paid by, exempt, 81(1)(g)
 - stock exchange recognized, 262
 - universities, gifts to, Reg. Sch. VIII, s. 11
- Gift**
 - attribution of income from gifted property, 74.1, 74.2
 - by employer to employee, taxable, 6(1)(a), 6(3)
 - by person with tax debt, recipient liable, 160
 - capital gain on property given, 69(1)(b)(ii)
 - charitable, *see* Gifts and donations (charitable)
 - deemed disposition at fair market value, 69(1)(b)(ii)
 - employer to employee, whether taxable, 6(1)(a) Notes
 - political party or candidate, *see* Political contribution
- Gift arrangement**
 - collection of half of tax in dispute, 164(1.1)(d)(iii)(B), 225.1(7)
 - constitutes tax shelter, 237.1(1)“tax shelter”
 - defined, 237.1(1)
- Gifts and donations (charitable)**
 - art created by the donor, 118.1(7), (7.1)
 - art flips
 - donation valued at cost of art, 248(35)–(38)
 - no minimum \$1,000 cost, 46(5)
 - subject to tax shelter rules, 237.1(1)“gifting arrangement”, “tax shelter”
 - capital dividend account, effect on, 89(1)“capital dividend account”(a)(i)(A)
 - capital property, of, election for lower proceeds, 110.1(3), 118.1(6)
 - carryback from year of death, 118.1(4)
 - carryforward
 - credit, 118.1(1)“total charitable gifts”
 - deduction to corporation, 110.1(1)(a)
 - charitable, *see also* Charity; Qualified donee
 - after donation of real estate or private company shares, 38(a.4), 38.3, 38.4 (abandoned)
 - by corporation, 110.1(1)(a)
 - by individual, 118.1(1)“total charitable gifts”, 118.1(3)
 - collection of half of tax in dispute, 164(1.1)(d)(ii)(B), 225.1(7)
 - commuter’s, 118.1(9)
 - corporate, deduction for, 110.1(1)(a)
 - gifts of property, limitation on fair market value, 248(35)–(38)
 - listed securities, no capital gain, 38(a.1)
 - partnership interests exchangeable for, 38(a.3)
 - total, 118.1(1)
 - corporation, by
 - amalgamation, effect of, 87(2)(v)
 - capital property, election for lower proceeds, 110.1(2.1), (3)
 - deduction for, 110.1(1)
 - partnership, made by, 110.1(4)
 - proof of, 110.1(2)
 - winding-up, claim by parent, 88(1)(e.6)
 - Crown, to, 118.1(1)“total charitable gifts”(a), 149.1(1)“qualified donee”(d)
 - cultural, 110.1(1)(c), 118.1(1)
 - deduction from tax, 118.1(3)
 - deemed disposition at fair market value, 69(1)(b)(ii)
 - ecologically sensitive land, 110.1(1)(d), 118.1(1)“total ecological gifts”
 - easement, servitude or covenant, value of, 110.1(5), 118.1(12)
 - valuation applies for capital gains purposes, 43(2)
 - first-time donor super credit, 118.1(3.1)
 - flow-through shares, deemed capital gain, 40(12)
 - capital dividend account impact, 89(1)“capital dividend account”(a)(i)(A), (B.1)
 - subsequent rollover, 38.1
 - gratuities, taxable as employment income, 5(1)
 - institutions, to, 110.1(1)(c)
 - insurance proceeds, direct designation, 118.1(5.2)(a)
 - member of religious order vowing perpetual poverty, 110(2)
 - municipality, to, 149.1(1)“qualified donee”(a)(ii)
 - non-qualifying security, credit disallowed, 118.1(13)–(13.3)
 - ordering of claims for donations
 - credits, 118.1(2.1)
 - deductions (corporation), 110.1(1.1)(b)
 - partnership, made by, 110.1(4), 118.1(8)

Index

- Gifts and donations (charitable) (*cont'd*)
 - proof of, required, 118.1(2)
 - property, of, 69(1)(b), (c)
 - valued at cost, 248(35)–(38)
 - RRSP or RRIF, direct designation, 118.1(5.2)(b)
 - reassessment, 152(6)(c)
 - receipts for, Reg. 3501
 - returned to donor, donation denied
 - corporate donor, 110.1(14)–(17)
 - individual donor, 118.1(25)–(28)
 - information return details, Reg. 3501.1
 - shares, publicly traded, 38(a.1)
 - partnership interests exchangeable for, 38(a.3)
 - TFSA, direct designation, 118.1(5.2)(b)
 - tax shelter, 237.1(1)“gifting arrangement”, “tax shelter”
 - collection of half of tax in dispute, 164(1.1)(d)(ii)(B), 225.1(7)
 - total, 118.1(1)
 - United States charities, 118.1(9); Canada-U.S. Tax Treaty:Art. XXI:7
 - will, by, 118.1(5) [before 2016], 118.1(5.1) [after 2016]
 - publicly traded securities, reduced capital gain, 38(a.1)(ii)
 - windup, on, 88(1)(e.6)
- Gladwin Realty case para. 47 overruled**, 245(1)“tax benefit”(c)
- Glasses, as medical expense**, 118.2(2)(j)
- Glazier**
 - apprenticeship job creation credit, 127(9)“investment tax credit”
- Global foreign expenses**
 - defined, for resource expenses of limited partner, 66.8(1)(a)(i)(D)
- Global foreign resource limit**
 - defined, 66.21(1)
- Gluten-free food costs, medical expense credit**, 118.2(2)(r)
- Goats**, 80.3(1)“breeding animals”
- Gold**, *see* Precious metals
- Golf course**
 - expense not allowed, 18(1)(l)
 - no COVID extended tourism relief, Reg. 8901.1(2)(b)(ix)(B)
- Goods**, *see also* Property
 - defined, for digital platform operator reporting rules, 282(1)
 - to be delivered
 - amounts received for, income, 12(1)(a)(i)
 - repayment of, deductible, 20(1)(m.2)
 - undelivered, reserve for, 20(1)(m)
- Goods and services tax (GST)**, *see also* Excise Tax Act
 - change of use, timing rule for GST liability, 248(15)
 - credit, *see* refundable credit (*below*)
 - defined, 248(1)
 - employee benefits
 - GST included in taxable benefit, 6(7)
 - rebate included in income, 6(8)
 - home purchase, excluded from moving expenses, 62(3)(f)
 - input tax credit
 - deemed to be assistance, 248(16), *see also* Assistance/government assistance
 - repaid, deemed to be reduction in assistance, 248(18)
 - interest on arrears, non-deductible, 18(1)(t)
 - interest on refunds, taxable, 12(1)(c)
 - penalty
 - gross-negligence penalty non-deductible, 67.6
 - ordinary penalty deductible, Reg. 7309
 - rebate for employees and partners, *Excise Tax Act* s. 253
 - deemed not to be reimbursement, 8(11)
 - deemed to be assistance, 248(16), *see also* Assistance/government assistance
 - included in income, 6(8), 12(1)(x)
 - reduces capital cost of property, 6(8), 13(7.1)
 - rebate, not paid until all income tax returns filed, *Excise Tax Act* s. 263.02
 - refund, not paid until all income tax returns filed, *Excise Tax Act* s. 229(2)
 - refundable credit, 122.5
 - “adjusted income” defined, 122.5(1)
 - advance payment, 122.5(3.1), (3.2)
 - amount of credit, 122.5(3)
 - applied to tax liability, timing, 164(2.1)
 - determination by Minister, 152(1)(b)
 - “eligible individual” defined, 122.5(1)
 - limit to one per family, 122.5(5)
 - overpayment not to require interest, 160.1(1)
 - penalty for false statement, 163(2)(c.1)
 - prisoners ineligible, 122.5(2)(b)
 - “qualified relation”
 - defined, 122.5(1)
 - jointly liable for repayment of excess, 160.1(1.1)
 - repayment where excess credit paid, 160.1(1.1)
 - restrictions, 122.5(2), (5)
 - returns to be filed before income tax refund paid, 164(2.01)
 - shareholder benefits
 - GST included in taxable benefit, 15(1.3)
 - transfer of income tax instalments or payments to GST account, 221.2(2)
- Goodwill**
 - 2016 and earlier (eligible capital property), 14 [repealed]; 20(1)(b) Notes
 - 2017 and later
 - acquisition of, 13(34)(b), 13(35)
 - CCA class, Reg. Sch. II:Cl. 14.1
 - capital cost allowance, Reg. 1100(1)(a)(xii.1), 1100(1)(c.1)
 - disposition of, 13(34)(c), (d), 13(37), (39)
 - included in “property”, 248(1)“property”(e)
 - pre-2017, Reg. Sch. II:Cl. 14.1
 - rules for, 13(34)–(42)
 - transitional rules from eligible capital property, 13(38)–(41)
 - exempt gains balance from 1994 capital gains exemption, 40(15), (16)
 - pre-1988 ECP, 40(13), (14)
- Goodwill amount**
 - defined, for restrictive-covenant rules, 56.4(1)
- Governing plan**
 - defined, Reg. 4901(2)
- Government**, *see also* Crown; Crown corporation
 - administration of income tax, *see* Minister (of National Revenue); Canada Revenue Agency
 - agreements
 - for tax transfer payments (federal-provincial), 154
 - with other countries, *see* Tax treaty
 - assistance, *see* Assistance/government assistance
 - bonds (and similar obligations)
 - Canada Savings Bonds, cash bonus, 12.1
 - “investment property” for deposit insurance corporation, 137.1(5)“investment property”(a)
 - issued at a discount, 16(3)
 - no non-resident withholding tax, 212(1)(b)(ii)(C)
 - bound
 - by deemed trust for tax withheld, 227(4.3)
 - by garnishment orders, 224(1.4)
 - by regulations requiring information returns, 221(3)
 - by withholding tax requirements, 227(11)
 - communication of confidential information to, 241(4)
 - contract payments, information return, Reg. 237
 - donation to, 149.1(1)“qualified donee”(d)
 - by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
 - employees abroad, deemed resident, 250(1)(b)–(f)

Index

Government (*cont'd*)

- foreign, *see* Foreign government
- gifts to, *see* donation to (above)
- grant, *see also* Assistance/government assistance
- • acquisition of depreciable property, towards, 13(7.1), (7.2)
- • cost base of property acquired, 53(2)(k)
- • energy conversion, 12(1)(u), 56(1)(s), *see also* Energy: conversion grant
- • home insulation, 12(1)(u), 56(1)(s), *see also* Home insulation grant
- • prescribed programs, under, 56(1)(s)
- Her Majesty, defined, *Interpretation Act* 35(1)
- international development assistance program, *see* Canadian International Development Agency
- lobbying, *see* Representation expenses
- obligation issued at discount by, 16(2), (3)
- officials, bribery of, no deduction, 67.5
- privatization of assets, debt qualifies for deferred income plans, Reg. 4900(1)(q)
- provincial, *see* Province
- public body performing function of, exempt, 149(1)(c)
- reporting of contract payments, Reg. 237
- representation, *see* Representation expenses
- rights from before 1972, transitional rules, ITAR 21
- -sponsored retirement arrangement, Reg. 8308.4
- • excluded from registered pension plan eligibility, Reg. 8502(m)
- • information return, Reg. 8402.1
- support payments for farmers, information slips, Reg. 234–236
- volunteer emergency worker's allowance paid by
- • exemption for, 81(4)

Government entity

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

Government of a country other than Canada

- defined, for foreign tax credit, 126(6)

Government payer

- defined, Reg. 234(1)

Government-sponsored retirement arrangement

- defined, Reg. 8308.4(1)
- information return, Reg. 8402.1
- prescribed reduction in RRSP limit, Reg. 8308.4(2)

Government verification service

- defined, for digital platform operator reporting rules, 282(1)

Governmental entity

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

Governor General in Council

- defined, *Interpretation Act* 35(1)

Governor General (of Canada)

- defined, *Interpretation Act* 35(1)
- salary taxable, 81(1)(n)

Grace period to pay balance, no additional interest, 161.2

Graduated rate estate

- alternative minimum tax \$40,000 deduction available, 127.51:C
- defined, 248(1)
- exempt from Part XII.2 tax, 210(2)(a)
- graduated tax brackets apply, 117(2), 122(1)
- instalments not required, 156.1(2)(c)
- investment tax credits available to beneficiaries, 127(7)
- late assessment allowed to reduce tax, 152(4.2), 164(1.5)
- objection deadline extended during first year after filing, 165(1)(a)
- taxation year may be non-calendar year, 249(1)(b)
- treated as personal trust, 248(1)“personal trust”(a), 249(4.1)

Grain

- defined, 76(5)
- delivered, amount due deemed not income debt, 76(4)

Grain elevator operators

- taxable income earned in a province, Reg. 408

Grain storage facilities

- capital cost allowance, additional, Reg. 1100(1)(sb)

Grandchild

- dependent, 118(6)(a)
- financially dependent, *see* Child: financially dependent
- treated as child, *see* Child: extended meaning of

Grandfathered plan (registered pension plan)

- complying before March 1996 budget, Reg. 8509(13)
- defined, Reg. 8500(1)

Grandfathered share

- defined, 248(1)
- dividend on, where deemed to be interest, 258(3)(b)(i)
- excluded from definition of “short-term preferred share”, 248(1)
- excluded from definition of “taxable preferred share”, 248(1)
- excluded from restriction on dividend deductibility, 112(2.21)(b)
- may be a taxable RFI share, 248(1)“taxable RFI share”
- Part VI.1 tax, excluded from, 191(2)(b)(iii), 191.1(2)(b), 191.1(4)(b)
- share exchanged for, excluded from Part IV.1 tax, 187.3(2)

Grandfathering, *see also* Grandfathered share; Transitional rules

- Canadian newspaper, 19(7)
- passive partnership interest acquired before Feb. 22/94, 40(3.1), (3.15)–(3.18)
- RESP investments, 146.1(1)“qualified investment”(d)
- RRSP, RRIF, RESP and RDSP prohibited investments, 207.01(1)“transitional prohibited investment benefit”, 207.01(7)
- taxable Canadian property only since April 26/95, prorating of gain, 40(9)
- trust established before June 18/71, low tax rates, 122(2)

Grandparent

- care by, social assistance for, *see* Kinship care, social assistance for
- dependent, 118(6)(b)
- includes in-law or in common-law, 252(2)(d)

Grant, *see also* Government: grant

- apprentice, *see* Apprenticeship Incentive Grant or Apprenticeship Completion Grant
- Canadian Oil Substitution Program, *see* Energy: conversion grant
- Canadian Home Insulation Program, *see* Home insulation grant
- exploration and development, 20(1)(kk)
- “non-government assistance” defined, 127(9)
- research
- • income from, 56(1)(o)
- • leaving Canada to pursue research under, 115(2)(b.1)

Grantee organization

- defined, for transfer by registered charity, 149.1(1)

Graphite, *see* Critical mineral

Grass roots exploration, *see* Pre-production mining expenditure

Gratuities, *see* Tips

Grazing ungulates, 80.3(1)“breeding animals”

Great-aunt/great-uncle

- defined, 252(2)(f)

Great Britain, *see* United Kingdom

Green card holder

- whether resident in U.S. for treaty purposes, Canada-U.S. Tax Treaty:Art. IV:1

Green case overruled, 96(2.01), (2.1)(f), 96(2.11)

Green incentives

- CRCE, *see* Canadian renewable and conservation expense
- Climate Action Incentive (greenhouse gas tax rebate), 122.8
- electric vehicles, *see* Zero-emission vehicle
- environmental trust, *see* Qualifying environmental trust

- Green incentives (*cont'd*)
- hydrogen vehicles, *see* Zero-emission vehicle
 - manufacturing and processing equipment, Reg. Sch. II:Cl. 43
 - public transit passes, credit for, 118.02 [pre-2018]
 - renewable power generating equipment, Reg. Sch. II:Cl. 43.1, Sch. II:Cl. 43.2
 - research and development, 37(1), 127(9)“SR&ED qualified expenditure pool”
- Greenhouse**
- capital cost allowance for, Reg. Sch. II:Cl. 6(d), Sch. II:Cl. 8(m)
- Greenhouse Gas Pollution Pricing Act**
- offsetting credit (Climate Action Incentive), 122.8(4)
 - offsetting refund to farmers, 127.42
- Grocery rebate (extra GST Credit for Jan. 2023)**, 122.5(3.003)
- Gross Canadian life investment income**
- defined, Reg. 2400(1)
- Gross compensation**
- defined, 163.2(1), (12)(c)
- Gross cost**
- defined, Reg. 5202, 5204
- Gross entitlements**
- defined
 - • for tax-debt avoidance penalty, 160.01(1)
 - • for third-party penalty, 163.2(1)
- Gross investment revenue**
- insurer’s, defined, 138(12)“gross investment revenue”
- Gross negligence**
- effect on adjustment to related person’s tax, Canada–U.S. Tax Treaty Canada–U.S. Tax Treaty:Art. IX:5
 - failure to report exempt capital gain, exemption lost, 110.6(6)
 - penalty for failure to remit tax withheld, 227(9)(b), 227(9.1)
 - penalty for failure to withhold tax, 227(8)(b)
 - penalty for false statements of omissions, 163(2)
 - • re flow-through share or joint exploration corporation, 163(2.2), (2.3)
- Gross REIT revenue**
- defined, for SIFT rules, 122.1(1)
- Gross resource profits**
- defined, Reg. 1204(1)
- Gross revenue**
- defined, 248(1)
 - • for international shipping rules, 250(6.01)
 - • for interprovincial allocation of corporate income, Reg. 402(4)–(6)
 - • limitation re non-profit R&D corporation, 149(9)
 - • special rules re transfer pricing, 247(5), (9)
 - from a mine, defined, Reg. 1104(5.1), (5.2)
- Gross revenue insurance program**
- payments to farmers under, income, 12(1)(p)
 - premiums in respect of, deductible, 20(1)(ff)
- Gross tax attributes (debt forgiveness rules)**
- defined, 80(14.1)
 - inclusion in residual balance, 80(14)(a)
- Gross-up**
- dividends, 82(1)(b)
- Ground source heat pump system**
- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(i), Sch. II:Cl. 43.2(b)
- Group**
- defined
 - • for associated corporations, 256(1.2)(a)
 - • for surplus stripping rules, 84.1(2.2), 212.1(3)(d)(i)
 - of taxpayers with same issue, Tax Court appeal binding on all, 174
 - related, defined, 251(4)“related group”
 - unrelated, defined, 251(4)“unrelated group”
- Group adjusted net book income**
- defined, for alternative interest-deduction restrictions, 18.21(1), (4)
- Group annuity contract**
- defined, for Common Reporting Standard, 270(1)
- Group cash value insurance contract**
- defined, for Common Reporting Standard, 270(1)
- Group disability benefits**
- top-up payments by employer on insolvency of insurer, 6(17), (18)
 - • reimbursement to employer, 8(1)(n.1)
- Group home care**
- medical expense credit, 118.2(2)(b.2)
- Group insurance plan**
- employer’s contributions to
 - • top-up payments on insolvency of insurer, *see* Group disability benefits
 - • whether included in employee’s income, 6(1)(a)(i), 6(1)(f)
- Group net interest expense**
- defined, for alternative interest-deduction restrictions, 18.21(1)
- Group of insurance contracts**
- defined
 - • for determining insurer’s capital, 138(12), 181(2), Reg. 8600
 - • for insurers’ IFRS transition rules, 138(12), Reg. 2400(1)
 - • for insurers’ policy reserves, Reg. 1408(1)
- Group of life insurance contracts**
- defined
 - • for insurers’ IFRS transition rules, 138(12), Reg. 2400(1)
 - • for insurers’ policy reserves, Reg. 1408(1)
- Group of life insurance contracts in Canada**
- defined
 - • for insurers’ IFRS transition rules, 138(12), Reg. 2400(1)
 - • for insurers’ policy reserves, Reg. 1408(1)
- Group of reinsurance contracts**
- defined
 - • for determining insurer’s capital, 138(12), 181(2), Reg. 8600
 - • for insurers’ IFRS transition rules, 138(12), Reg. 2400(1)
- Group of segregated fund policies**
- defined
 - • for insurers’ IFRS transition rules, 138(12), Reg. 2400(1)
- Group plan amount [formerly “group RRSP amount”]**
- defined, 204.2(1.3)
- Group ratio**
- defined, for alternative interest-deduction restrictions, 18.21(1)
- Group sickness or accident insurance**, *see* Sickness and accident insurance
- Group term insurance policy**
- definition, re insurer, 138(15)
 - demutualization of insurance corporation, effect on insured, 139.1(15)
- Group term life insurance policy**
- defined, 248(1)
 - employee contributions to employee life and health trust deemed to be premiums if identified as such, 144.1(10)
 - limitation on deduction of premiums, 18(9.01)
 - taxable benefit from premiums, 6(4), Reg. 2700–2704
- Grubstaker**, 35
- receipt of shares by
 - • deduction from amount, 110(1)(d.2)
- Guarantee**
- acquired from insurer or moneylender in amalgamation, 87(2)(h)(iii)
 - for controlled foreign affiliate, excluded from transfer pricing rules, 247(7.1)
 - loan to spouse or minor, of, 74.5(7)
 - of shares, *see* Guaranteed shares
 - payment under

Index

- Guarantee** (*cont'd*)
- debt forgiveness rules, 80(2)(1)
 - when treated as debt, 39(12)
 - reserve for, 12(1)(d.1), 20(1)(l.1)
 - no deduction, 20(7)
- Guarantee agreement**
- defined, 112(2.2)(a)
 - no deduction for dividend, 112(2.2)–(2.22)
- Guarantee fee**
- deductible, 20(1)(e), (e.1)
 - no withholding tax, Canada-U.S. Tax Treaty:Art. XXII:4
 - non-resident, 214(15)
- Guarantee fund**
- deduction for payment by insurance corporation to, Reg. 1400(3)G
- Guaranteed Income Supplement, included in income,** 56(1)(a)(i)(A)
- offsetting deduction, 110(1)(f) opening words
- Guaranteed shares,** *see also* Taxable preferred share; Term preferred share
- deemed dividend on reduction of paid-up capital, 84(4.3)
 - restriction on dividend deductibility, 112(2.2)–(2.22), 258(3)
- Guardian, return by,** 150(1)(d), (e)
- Guide dog expenses,** 118.2(2)(1)
- Guilt,** *see* Offences
- Gulf Canada case overruled re resource allowance,** Reg. 1204(1)
- Gypsum**
- extraction of, 248(1)“mineral resource”(d)(ii)
- ## H
- HBP,** *see* Home Buyers' Plan
- HBP balance**
- defined, for Home Buyers' Plan, 146.01(1)
- HBTC,** *see* Home Buyer's Tax Credit
- HMA,** *see* Hybrid mismatch arrangement
- HRDC,** *see* Human Resources Development Canada
- HRTC,** *see* Home renovation tax credit
- HWT,** *see* Health and welfare trust
- Habitation, right of (Quebec)**
- deemed to be trust, 248(3)
- Haida Gwaii**
- prescribed intermediate zone for northern residents' deduction, Reg. 7303.1(2)
- Hairstylist**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Haiti**
- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(b) [repealed]
- Half-year rule, depreciable property,** Reg. 1100(2)–(2.4)
- Halifax disaster pension, exempt,** 81(1)(f)
- Halite**
- extraction of, 248(1)“mineral resource”(d)(ii)
- Handicapped persons,** *see* Mental or physical impairment
- Hangar, capital cost allowance,** Reg. Sch. II:Cl. 6(h)
- Hardest-hit business recovery program (COVID-19)**
- wage and rent subsidies, 125.7(1)“base percentage”(1)(ii), (m)(ii)
- Hardship,** *see* Undue hardship
- Hardwood flooring**
- disallowed as medical expense, 118.2(2)(1.2)(i), (ii), 118.2(2)(1.21)(i), (ii)
- Harness**
- capital cost allowance, Reg. Sch. II:Cl. 10(c)
- Headings in legislation**
- relevance of, *Interpretation Act* s. 14
- Head lease, defined,** 209(1)
- “term” defined, 209(1)
- Health and welfare trust**
- transfer of property to employee life and health trust, 144.1(16)–(17)
 - treated as employee life and health trust, 144.1(14)–(15)
- Health Canada**
- Special Access Programme, *see* Special Access Programme
- Health care plan,** *see* Private health services plan
- Health counselling,** *see* Counselling services
- Health promotion surtax,** 182, 183
- Health services plan**
- employer's contribution to
 - not includable in employee's income, 6(1)(a)(i)
 - private, premiums to, 118.2(2)(q)
- Hearing aid, medical expense,** 118.2(2)(i)
- Hearing impairment,** *see also* Deaf person
- devices to assist person with
 - business expense, 20(1)(rr)
 - medical expense credit, Reg. 5700(q.1)
 - real-time captioning services for, *see* Captioning services
 - sign language interpretation services for, *see* Sign language
- Hearing officer**
- powers of, 231.4(3), (4)
- Hearse**
- excluded from definition of automobile, 248(1)“automobile”(c)
- Heart pacemaker/monitor**
- medical expense, Reg. 5700(d)
- Heat production/distribution equipment**
- capital cost allowance, Reg. Sch. II:Cl. 1(p), Sch. II:Cl. 2(f)
- Heat pump system,** *see* Ground source heat pump system
- Heat recovery equipment**
- capital cost allowance, Reg. Sch. II:Cl. 43.1
- Heating expenses**
- relief from, payments non-taxable, 81(1)(g.4), (g.5)
- Heavy duty equipment technician**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Heavy water**
- capital cost allowance for, Reg. Sch. II:Cl. 26
- Hedge**
- gain on, stop-loss rule on foreign affiliate share disposition, 93(2)–(2.31)
 - straddle transactions, rules preventing income deferral, 18(17)–(23)
- Heir,** *see also* Legal representative
- acquisition of property on death, cost base, 70(5)(b)
 - resource property or land inventory, 70(5.2)
 - deemed to be legal representative, 248(1)“legal representative”
 - obligations of, 159
 - return required by, 150(3)
- Henson trust**
- rollover of RRSP to, 60.011
- Hepatitis C trust**
- income of, non-taxable, 81(1)(g.3)
- Her Majesty,** *see* Crown; Government
- Herbert Family Trust case overruled,** 214(3)(f)(i)(C)
- Herd,** *see* Basic herd
- High school,** *see* Secondary school
- High value account**
- defined, for Common Reporting Standard, 270(1)
- Highest individual percentage**
- defined, 248(1)

- Hiring subsidy**, 125.7(2.2)
- History preservation rules**, *see* Debt forgiveness: history preservation rules
- Ho case overruled**, 152(4)(b)(iii)(B)
- Hockey players or referees**, *see* Athlete
- Hoefele case overruled**, 6(23)
- Hogs**, *see* Swine
- Hold**
- meaning of, 139.1(1)“mutual holding corporation” (Notes)
- Holder**
- of first home savings account (FHSA)
 - defined, 146.6(1)
 - of registered disability savings plan (RDSP)
 - change in, notification required, 146.4(13)(a)
 - defined, 146.4(1)
 - liable for non-compliance by RDSP, 160.21
 - of tax-free savings account (TFSA)
 - defined, 146.2(1)
- Holding corporation (insurance demutualization)**
- deemed not to be taxable Canadian property, 141(4)
 - deemed to be public corporation, 141(3)
 - defined, 139.1(1)
 - dividend received by, no tax, 112(1)
- Holiday**
- deadline expiring on, *Interpretation Act* s. 26
 - defined, *Interpretation Act* s. 35(1)
 - includes Sunday, *Interpretation Act* s. 35(1)“holiday”
- Holocaust survivor’s compensation, exempt**, 81(1)(g)
- Home**, *see also* Principal residence; Underused housing tax
- Buyer’s Plan, *see* Home Buyers’ Plan
 - construction costs, medical expense credit, 118.2(2)(1.21)
 - cost of maintaining after move, deduction, 62(3)(g)
 - defined, for Home Buyers’ Plan withholding exemption, Reg. 104(4)
 - driveway alterations, medical expense credit, 118.2(2)(1.6)
 - insulation grant, *see* Home insulation grant
 - loan to purchase, *see* Home purchase loan
 - loss in value of, reimbursement, *see* Housing loss
 - maintenance of after moving away, deduction, 62(3)(g)
 - modifications to, for physically impaired person
 - accessibility credit, *see* Home accessibility tax credit
 - medical expense credit, 118.2(2)(1.2)
 - mortgage, *see* Mortgage
 - office expenses, *see* Work space in home
 - principal, *see* Principal residence
 - RRSP withdrawal to fund, *see* Home Buyers’ Plan
 - relocation loan, *see* Home relocation loan
 - renovation of, *see* Home renovations
 - sale of, *see* Principal residence
 - search warrant of, 231.3
 - sold within 1 year, deemed inventory, 12(12), (13)
 - warrant for entry into, for audit purposes, 231.1(1)(c), 231.1(3)
- Home accessibility tax credit**
- bankruptcy, effect of, 118.041(6), (7)
 - calculation of, 118.041(3)
 - apportionment among multiple claimants, 118.041(5)
 - death, effect of, 118.041(7)(a)
 - may double up with medical expense credit, 118.041(4)
- Home assistance benefit**
- paid to Canadian Forces member or veteran, exempt, 81(1)(d.1)(vii)(D)
- Home Buyers’ Plan**, 146.01
- death of taxpayer, 146.01(6), (7)
 - definitions, 146.01(1)
 - first-time owner requirement, 146.01(1)“regular eligible amount”(e), (f)
 - repayment of funds borrowed from RRSP, 146.01(3)
 - withdrawal of funds from RRSP, Reg. 104(3)
 - within 90 days of contribution, deduction disallowed, 146(5)(a)(iv.1), 146(5.1)(a)(iv)
 - withholding tax exemption, Reg. 104(3)–(4)
- Home Buyer’s Tax Credit**, 118.05
- Home construction costs**
- medical expense, 118.2(2)(1.21)
- Home insulation grant**
- included in income, 12(1)(u), 56(1)(s)
 - information return re, Reg. 224
 - non-resident taxable on, 212(1)(s)
 - prescribed program, Reg. 5500
- Home modifications benefit**
- paid to Canadian Forces member or veteran, exempt, 81(1)(d.1)(vii)(A)
- Home modifications move benefit**
- paid to Canadian Forces member or veteran, exempt, 81(1)(d.1)(vii)(B)
- Home mortgage**, *see* Mortgage
- Home office expenses**, *see* Work space in home
- Home purchase loan**
- balance outstanding after 5 years deemed new loan, 80.4(6)
 - defined, 80.4(7)
 - employee or spouse, to, 15(2.4)(b)
 - interest on, 80.4(4), (5)
- Home relocation loan**
- balance outstanding after 5 years deemed new loan, 80.4(6)
 - deduction for, before 2018, 110(1)(j)
 - defined, 248(1)
 - interest on, 80.4(4), (5)
- Home renovation tax credit**
- 2009 only, 118.04
 - multigenerational, for family member to live in home, 122.92
- Home renovations**
- credit for accessibility, 118.041
 - credit for family member to live in home, 122.92
 - medical expense, 118.2(2)(1.2), Reg. 5700
 - driveway alterations, 118.2(2)(1.6)
- Homosexual relationships**, *see* Common-law partner
- Hong Kong**, *see also* Foreign government
- film or video under treaty co-production, Reg. 1106(3)(b)
 - stock exchange recognized, 262
 - universities, gifts to, Reg. Sch. VIII, s. 19
- Horse**
- basic herd maintained since 1971, deduction, 29
 - breeding, 80.3(1)“breeding animals”
 - inventory, valuation of, 28(1.2)
 - maintaining for racing, constitutes farming, 248(1)“farming”
- Horseback riding**
- eligible for children’s fitness credit, Reg. 9400(5)
- Hospital bed**
- medical expense, Reg. 5700(h)
- Hot tub**
- disallowed as medical expense, 118.2(2)(1.2)(i), (ii), 118.2(2)(1.21)(i), (ii)
- Hot-air balloon rides relief (COVID)**, Reg. 8901.1(2)(b)(vi), *see also* Qualifying tourism or hospitality entity
- Hotels and motels relief (COVID)**, Reg. 8901.1(2)(b)(i), *see also* Qualifying tourism or hospitality entity
- House**
- insulation, *see* Home insulation grant
 - sale of, *see* Principal residence
- House of Commons**
- election of members, contributions for, 127(3)–(4.2)
- Housing**, *see* Home

Housing company

- limited-dividend
- • exemption, 149(1)(n)

Housing corporation

- donation to, 149.1(1)“qualified donee”(a)(i)
- • by corporation, deduction, 110.1(1)(a)
- • by individual, tax credit, 118.1(1)“total charitable gifts”
- exempt from tax, 149(1)(i)

Housing loan, *see* Home purchase loan

Housing loss

- defined, 6(21)
- eligible
- • defined, 6(22)
- • taxable benefit from, 6(1)(a), 6(20)
- taxable benefit from, 6(1)(a), 6(19), (20)

Housing subsidy

- taxable benefit, 6(23)

Housing tax, *see* Underused housing tax

Housing unit, *see also* Principal residence

- sold within 1 year, deemed inventory, 12(12), (13)

Human Resources Development Canada

- advice re mental or physical impairment, 118.3(4)
- certification of educational institution, 118.5(1)(a)(ii), 118.6(1)“designated educational institution”(a)(ii)
- disclosure of information to, 241(4)(d)(vii.1), (x)
- eligible individuals for Canada Child Benefit, 122.62, 165(3.1), (3.2), Reg. 6301
- Social Insurance Number application, 237(1); Reg. 3800

Hungary, *see also* Foreign government

- universities, gifts to, Reg. Sch. VIII, s. 23

Hunting camps relief (COVID), Reg. 8901.1(2)(b)(xii), *see also* Qualifying tourism or hospitality entity

Husband and wife, *see* Spouse

Hutterite colonies, taxation, 143, *see also* Communal organization

Hybrid car, *see* Zero-emission vehicle

Hybrid deficit (of foreign affiliate)

- defined, Reg. 5907(1)

Hybrid entity, *see also* Limited liability company; Nova Scotia: unlimited liability company

- treaty benefit denial, Canada-U.S. Tax Treaty:Art. IV:7

Hybrid financial instrument arrangement

- defined, 18.4(10)
- effect of, 18.4(11)

Hybrid financial instrument mismatch

- defined, 18.4(11)

Hybrid mismatch amount

- defined, 18.4(1)

Hybrid mismatch arrangement

- anti-avoidance rules, 12.7, 18.4, 20(1)(yy), 113(5)
- deduction denied, 18.4(4)
- defined, 18.4(1)
- dividend deduction denied, 113(5)
- income inclusion, 12.7(3)
- tax consequences determined, 18.4(20)

Hybrid surplus (of foreign affiliate)

- deduction for, 113(1)(a.1)
- defined, 113(1)(a.1)(i), Reg. 5901(1)(a.1), 5907(1), (1.01)
- election to come after taxable surplus, Reg. 5901(1.1)
- portion of dividend deemed paid out of, Reg. 5900(1)(a.1)

Hybrid transfer arrangement

- defined, 18.4(12)
- effect of, 18.4(13)

Hybrid transfer mismatch

- defined, 18.4(13)

Hybrid underlying tax

- defined, Reg. 5907(1)

Hybrid underlying tax applicable

- defined, Reg. 5907(1)

Hydrocarbons

- determination of viscosity and density, Reg. 1107

Hydrogen

- investment tax credit, *see* Clean hydrogen
- vehicle, *see* Zero-emission vehicle

Hypothec, *see* Mortgage

I

IAAC, *see* Income-averaging annuity contract

IATA, *see* International Air Transport Association

IBC, *see* International banking centre until 2013

ICS, *see* Interest coupon stripping

IEP, *see* Immediate expensing property

IFE, *see* Interest and financing expenses

IFR, *see* Interest and financing revenues

IFRS, *see* International Financial Reporting Standards

IPP, *see* Individual pension plan

IPP minimum amount

- defined, for Individual Pension Plan, Reg. 8500(1)

IRA, *see* Individual Retirement Account

IRS, *see* Internal Revenue Service (U.S.)

ISC Register, *see* Individuals with Significant Control (of corporations)

ISIP, *see* Indexed security investment plan

ITAR (Income Tax Application Rules), *see after text of ITA*

ITC, *see* Investment tax credit

Ice storm

- extended deadlines
- • LSVCC investments, 127.4(5.1)
- • RRSP contributions, 146(22)
- non-taxable employee reimbursements, *Ice Storm Employment Benefits Remission Order*

Identical properties

- deemed, for superficial loss and pregnant loss rules
- • capital property, 40(3.5)
- • inventory, 18(16)
- • right to acquire property, 54“superficial loss”(i)
- • share of SIFT wind-up corporation, 54“superficial loss”(j)
- defined, 248(12)
- • for matchable expenditure rules, 18.1(12)
- gain or loss from, 47
- life insurance corporation, of, 138(11.1)
- non-qualifying real property, 110.6(18)
- property owned since before 1972, ITAR 26(8)–(8.5)

Identification number, *see* Social insurance number; Tax shelter: identification number

Identified individual

- defined, for annuity contracts, Reg. 301(1)(c)

Ileostomy pads, as medical expense, 118.2(2)(i)

Illegal payments

- when not deductible, 67.5

Immediate expensing limit (for CCA)

- defined, Reg. 1104(3.2)

Immediate expensing property (for CCA)

- deduction for, 20(1)(a), Reg. 1100(0.1)
- defined, Reg. 1104(3.1)

Immigrant trust, *see* Immigration trust

Immigration, *see* Becoming resident in Canada

Immigration Act

- refugee under, *see* Refugee

Index

Immigration trust

- five-year non-taxability until 2014, 94(1)“connected contributor”(a), 94(1)“resident contributor”(a)

Immovable property, *see also* Real property

- defined
- for digital platform operator reporting rules, 282(1)
- *Income Tax Conventions Interpretation Act*, s. 5
- *Quebec Civil Code*, art. 900–907

Immune system deficiency

- air or water purifier for, medical expense credit, Reg. 5700(c.1), (c.2)

Impaired loans

- reserve for, 20(1)(1)(ii)
- no deduction when property seized by creditor, 79.1(8)
- no interest income inclusion, 12(4.1)

Impairment, *see* Mental or physical impairment

Imposition of tax, *see also* Liability for tax; Rates of tax

- Part VI.2 (for 2022), 191.5(2)

Imprisonment, *see* Offences

Imputation, *see* Attribution rules

In camera proceedings

- discipline etc., of authorized individual, to protect taxpayer information, 241(4.1)
- in Federal Court, 179
- review of jeopardy assessment, 225.2(10)
- review of solicitor-client privilege claim, 232(5)

“In trust for” accounts, 104(1) (Notes)

Inadequate consideration, 69

- exceptions to fair market value deeming provision, ITAR 32
- property acquired by gift or inheritance, 69(1)(c)
- property distributed to shareholder, 69(4), (5)
- purchase price in excess of fair market value, 69(1)(a)
- sale price below fair market value, 69(1)(b)

Incentive program

- for employees, taxable benefit, 6(1)(a)
- for RRSP, RRIF, TFSA, RESP or RDSP, 207.01(1)“advantage”(a)(v)

Includes

- meaning of (in a definition), 118.1(5) (Notes)

Income

- accumulating in a trust, 104(14), Reg. 2800
- active business, defined, 125(7)“income of the corporation for the year from an active business”
- alimony, 56(1)(b)
- allocation, *see* Income allocation
- annuity, 56(1)(d), (d.2)
- capital element, deductible, 60(a)
- assistance, *see* Older Worker Adjustment, Program for; Social assistance payment
- automobile standby charge, 6(1)(e)
- car salesperson/lessor, 6(2.1)
- reasonable amount, 6(2)
- automotive pact, transitional assistance, 56(1)(a)(v)
- averaging, *see* Averaging of income; Income-averaging annuity contract
- beneficiary of trust, 104(13), (14), (15)
- blocked currency, in, 161(6)
- bond, *see also* Bond
- bursary, 56(1)(n)
- business or property, from, *see* Business or property income
- Canada Pension Plan benefits, 56(1)(a)(i)
- capital and, combined, 16(1), (4), (5)
- paid to non-resident, 214(2)
- cash method of reporting (farming or fishing), 28(1)–(3)
- chief source of, 31
- cod fisherman, *see* Fishing: compensation programs
- computation of, *see* Computation of income

- death benefit, 56(1)(a)(iii)
- debenture, *see* Bond
- deferred profit sharing plan, receipts from, 56(1)(i)
- destruction of livestock, from, *see also* Livestock
- determination of, by Minister, 152(1.11), (1.12)
- dividends, 82(1)
- non-resident corporation, from, 90
- “earned” for RRSP purposes, defined, 146(1)“earned income”
- “earned in the year in a province” defined, 120(4)
- earned in the year in a province by an individual, defined, Reg. Part XXVI
- earned or realized by any corporation after 1971, 55(2), (5)(b), (c)
- employee benefits plan
- benefits, 6(1)(g)
- employment benefits, 6(1)
- employment insurance benefits, 6(1)(f), 56(1)(a)(iv)
- exclusions from, *see* Exemptions
- exempt, *see* Exemptions
- exploration and development expenses, recovery of, 59(3.2)
- “for the year” defined, 56(9)
- foreign resource property disposed of, 59(1)
- from active business, defined, 95(1), 125(7)
- from property, for dividend refund, 129(4)“income” or “loss”
- gaining or producing, purpose, 18(1)(a), Reg. 1102(1)(c)
- grants under certain government programs, 56(1)(s)
- indirect payments, 56(2)
- “investment income” defined, 110.6(1)
- *Labour Adjustment Benefits Act*, benefits under, 56(1)(a)(vi), Reg. 5502(a)
- legal costs recovered, 56(1)(l), (l.1)
- life insurance policy
- proceeds of disposition of interest in, 56(1)(j)
- logging operations, from, defined, 127(2)“income for the year from logging operations in the province”
- maintenance payments, 56(1)(b), (c), (c.2)
- non-resident, of, 250.1(b)
- none, equivalent to zero income, 3(f)
- office or employment, from, 5(1), 6(1)
- old age security, 56(1)(a)(i)
- other sources of, 56–59.1
- pension, 56(1)(a)(i), 57
- place, from sources in, 4
- policyholder’s, 148(1), (1.1)
- prize for achievement, 56(1)(n)
- professional business, from, WIP deferral until 2017, 34
- Program for Older Worker Adjustment, income assistance, 56(1)(a)(vi), Reg. 5502(b)
- property transferred to minor, from
- imputed to transferor, 75(2)
- property transferred to spouse, from, 212(12)
- property transferred to spouse or minor, 74.1
- Quebec Parental Insurance Plan benefits, 56(1)(a)(vii)
- refund of payments, deductible, 60(q)
- registered education savings plan, amounts received, 56(1)(q)
- registered retirement income fund, amounts received, 56(1)(t)
- registered retirement savings plan, amounts received from, 56(1)(h)
- repeated failures to report, penalty for, 163(1)
- research grant, 56(1)(o)
- resource property disposed of
- prior reserve for uncollected amount, 59(2)
- retirement compensation arrangement
- benefits under, 56(1)(x), (z)
- disposition of interest in, 56(1)(y)
- retiring allowance, 56(1)(a)(ii)
- rights to, transferred, 56(4)
- non-resident tax not applicable, 212(12)
- salary deferral arrangement, benefit under, 56(1)(w)

Index

Income (*cont'd*)

- Saskatchewan Pension Plan benefits, 56(1)(a)(i)(C)
- scholarship, 56(1)(n)
- refund of, 56(1)(p)
- social assistance payments, 56(1)(u)
- source, from, 4
- splitting, *see* Income splitting
- superannuation benefits, 56(1)(a)(i), 57
- supplementary unemployment benefits, 56(1)(g)
- support payments, 56(1)(b), (c), (c.2)
- tax on, *see also* Tax
 - non-deductible, 18(1)(t)
- taxable, *see* Taxable income
- taxation year, for, 3
- transitional assistance under auto pact, 56(1)(a)(v)
- trust, of
 - accumulating, *see* Accumulating income (of trust)
 - defined, 108(3)
- workers' compensation benefits, 56(1)(v)

Income attribution, *see* Attribution rules

Income averaging, *see* Averaging of income

Income-averaging annuity contract

- defined, 61(4), 248(1)
- payment under
 - non-resident, to, 212(1)(n)
- withholding tax, 153(1)(k)

Income bond

- defined, 248(1)
- interest paid on, not deductible, 18(1)(g)
- payment on deemed to be a dividend, 15(3), (4)

Income from a mine

- defined, Reg. 1104(5), (6)

Income from a non-qualifying business

- defined, for FAPI rules, 95(1)

Income from an active business, *see* Active business: income from

Income from property, *see* Property: income from

Income interest in trust, *see also* Trust (or estate)

- cost of, 106(1.1)
- defined, 108(1), 248(1)
- disposition of, 106(2)
- income inclusion, 106(1)
- property distributed in satisfaction of, 106(3)

Income maintenance insurance plan

- employer's contribution, whether a taxable benefit, 6(1)(a)(i)
- payment to employee under, taxable, 6(1)(f); ITAR 19

Income replacement benefits, taxable, 56(1)(r)

Income setoff adjustment, *see* Transfer pricing income setoff adjustment

Income shortfall adjustment

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

Income splitting, *see also* Attribution rules

- Family Tax Cut (2014-15), 119.1
- partnership income, 103
- pension income, *see* Pension: income: splitting with spouse
- spouses or common-law partners, approved (2014-15), 119.1
- tax on children at high rate, 120.4, *see also* Split income: tax on
- testamentary trusts, 104(2)

Income-splitting tax, 120.4

- death, consequence of, 120.4(1)“excluded amount”(a), (c); 120.4(1.1)(b), (c)(ii)
- spouse of person over 65, 120.4(1.1)(c)(i)

Income tax, *see* everywhere

Income Tax Application Rules, *see after text of ITA*

Income Tax Conventions Interpretation Act, *see* Table of Contents

Income trust, *see* SIFT trust

Incontinent person, *see also* Mental or physical impairment

- products for use by, medical expense credit, 118.2(2)(i)

Incorporated employee, *see* Personal services business

Incorporated in Canada

- defined, 248(1)“corporation”, “corporation incorporated in Canada”

Incorporation expenses

- deductible up to \$3,000, 20(1)(b)
- excess included in goodwill, Reg. Sch. II:Cl. 14.1

Incorporeal property, *see* Corporeal property

Indebtedness, *see also* Debt; Loan

- defined, for deemed settlement of debt on amalgamation, 80(3)
- income of foreign affiliate from, 95(2)(a.3), 95(2.4), (2.5)“indebtedness”
- to non-resident trust, reporting requirement, 233.5(1)

Indemnity

- in agreement to sell business, does not trigger mandatory reporting rules, 237.3(1)“contractual protection”(a)(ii)(B)
- payment, provincial, excluded from income, 81(1)(q)
- reserve for, not deductible, 20(7)

Independent personal services, Canada-U.S. Tax Treaty:Art. V:9, VII

Indexed debt obligation

- adjusted cost base of, 53(1)(g.1), 53(2)(1.1)
- amount deemed paid and received as interest, 16(6), Reg. 7001
- deduction from income, 20(1)(c), 16(6)
- defined, 248(1)
- excluded from annual interest accrual rules, 12(3), 12(11)“investment contract”(k)
- interest included in income, 12(1)(c), 16(6)
- prescribed amount, Reg. 7001

Indexed payment

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

Indexed security investment plan

- transition for 1986, 47.1(28)

Indexing (for inflation)

- Child Tax Benefit before July 2016 and starting July 2020, 122.61(5)
- tax brackets, credits and dollar thresholds, 117.1(1), (1.1)
- tax-free savings account contribution limit, 207.01(1)“TFSA dollar limit”(d)

India, *see also* Foreign government

- trust resident in, 93.3
- universities, gifts to, Reg. Sch. VIII, s. 24

Indian

- credit for First Nations Tax payable, 120(2.2)
- exemption from tax, 81(1)(a)
 - exempt income eligible for contribution to pooled registered pension plan, 147.5(1)“exempt earned income”, 147.5(31)–(34)
- resident in Canada without permanent resident status
 - entitled to Canada Child Benefit, 122.6“eligible individual”(e)(v)
 - entitled to GST Credit, 122.5(2)(c)
- residential school settlement, *see* Indian Residential Schools Settlement trust
- tax evasion offences, 239(5)

Indian Residential Schools Settlement trust

- income of, non-taxable, 81(1)(g.3)(i)(C)

Indicator re foreign trust, *see* Non-arm's length indicator

Indirect assistance

- taxable, 12(1)(x)(i)(C)

Indirect payments

- corporation, by

Indirect payments (cont'd)

- person paid through intermediary as proceeds of disposition of property, 183.1(5)
- deemed income, 56(2)
- distribution of corporate surplus, tax on, 183.1(5)

Indirectly

- meaning of, 17.1(1) (Notes)

Individual

- bankrupt, 128(2)
- computation of tax, 117–122.91
- computation of taxable income, order of application, 111.1
- credits, 118–118.95
- defined, 248(1)
- excludes trust for purpose of home accessibility tax credit, 118.041(1)
- excludes trust for purpose of Multigenerational Home Renovation Tax Credit, 122.92(1)
- fiscal period of, 249.1(1)(b)(i)
- gifts, deduction from tax, 118.1(3)
- income earned in the year in a province, Reg. Part XXVI
- “income for the year” defined, 120(3)
- instalment base, Reg. 5300
- instalment payments, 155, 156
- “instalment base” defined, 161(9)(a)
- insufficient instalment payments
- interest limitation, 161(4)
- mentally or physically impaired, *see* Mental or physical impairment
- over 65, deduction, 118(2)
- unused, transfer to spouse, 118.8
- payment of tax, 155, 156
- instalment base, 155(2), 156(3)
- remainder, 158
- rates of tax, 117(2)
- abatement re provincial schooling allowance, 120(2)
- addition to tax for income not earned in province, 120(1)
- annual adjustment, 117.1
- resident for part of year, 114
- returns, 150(1)(d), (e)
- surtax, 180.1 [repealed]
- tax credits, 118
- ordering of, 118.92
- taxation year of, 249(1)(b)

Individual pension plan

- defined, Reg. 8300(1)
- Minister may waive definition, Reg. 8300(1.1)
- minimum amount, Reg. 8500(1)“IPP minimum amount”
- minimum withdrawal, Reg. 8503(26)
- permissible distribution, Reg. 8502(d)(x)
- provisional PSPA in relation to, Reg. 8304(10)
- special rules for designated plans, Reg. 8515

Individual Retirement Account, *see also* Foreign retirement arrangement

- exempt from Canadian withholding tax, Canada-U.S. Tax Treaty, Reg. Part XXI:2
- prescribed as foreign retirement arrangement, Reg. 6803

Individuals with Significant Control (of corporations)

- disclosure of to CRA and the public, 150(1)(a) Notes
- provision of information by CRA to confirm CBCA compliance, 241(4)(u)

Inducement payments

- cancellation of lease, *see* Lease cancellation payment
- election re adjusted cost base, 53(2)(s), 53(2.1)
- election to offset against outlay or expense, 12(2.2)
- included in income, 12(1)(x)
- prescribed amount, Reg. 7300
- received by beneficiary of trust, or partner, 12(2.1)
- repayment of, 20(1)(hh)

Industrial electrician

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

Industrial instrument mechanic

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

Industrial mechanic (millwright)

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

Industrial mineral mines

- capital cost allowance, Reg. 1100(1)(g), 1104(3), Reg. Sch. V

Industrial minerals

- producing, excluded from M&P credit, 125.1(3)“manufacturing or processing”(g)

Ineligible individual

- defined, 149.1(1)
- managing or controlling charity
- CRA can refuse to register charity, 149.1(25)
- CRA can revoke registration of charity, 149.1(4.1)(e)
- CRA can suspend registration, 188.2(2)
- managing or controlling Canadian amateur athletic association
- CRA can refuse to register RCAA, 149.1(25)
- CRA can revoke registration of RCAA, 149.1(4.2)(c)

Ineligible property

- defined, for cost base bump on windup, 88(1)(c)(iii)–(vi)

Ineligible use

- for captured carbon, defined, 127.44(1)

Infant

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

Infirm beneficiary

- defined, 94(1)“exempt foreign trust”(a)(i)(A)

Infirm dependant, *see also* Mental or physical impairment

- credit for, 118(1)B(d), (e)
- preferred beneficiary election, 108(1)“preferred beneficiary”(a)(ii)(A)
- training courses to care for, medical expense, 118.2(2)(1.8)

Inflation adjustment period

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

Inflation indexing, *see* Indexing (for inflation)**Influence over a corporation**

- whether constitutes *de facto* control, 256(5.1), (5.11)

Informal procedure appeals, 170**Informant payments (for leads on international tax evasion)**

- disclosure of information by CRA to informer, 241(4)(r)
- payment to province only after collected by CRA, 152(10)(b)
- payments included in income, 56(1)(z.4)
- deduction for repayment, 60(z.1)
- non-resident withholding tax, 212(1)(x)
- information return, Reg. 202(2)(m)
- withholding of tax at source, 153(1)(s), Reg. 103(9)

Information

- communication of, 241
- demand for, 231.2(1)(a)
- exchange of between tax authorities, Canada-U.S. Tax Treaty:Art. XXVII
- failure to provide, in return, penalty for, 162(5)
- foreign-based, 231.6
- laid, *see* Information or complaint
- outside Canada
- foreign-based information or document, 231.6
- tax shelter investment information, 143.2(13), (14)
- requirement to provide, 231.2(1)(a)
- return, *see* Information return

Information exchange agreement, *see* Tax information exchange agreement

Index

Information or complaint

- laid or made, 244(1)
- limitation on prosecutions, 244(4)
- territorial jurisdiction, 244(3)
- two or more offences in one, 244(2)

Information return, Reg. 200–238

- actor (non-resident), payment to, Reg. 202(1.1)
- apprenticeship grant, Reg. 200(2)(b.1)
- avoidance transactions, 237.3(2)
- bond interest, accrued, Reg. 211
- Canada Savings Bonds, cash bonus, Reg. 220
- Canadian Wheat Board Farmers' Trust, 135.2(15)
- ceasing to be resident in Canada, value of assets, 128.1(9)
- certified films, Reg. 225
- charitable donation returned to donor, 110.1(16), 118.1(27), Reg. 3501.1
- charity, 149.1(14)
- construction contracts, Reg. 238
- contract payments
 - construction, Reg. 238
 - federal government, Reg. 237
- corporation
 - transactions with non-resident, non-arm's length persons, 233.1
- country-by-country reporting, multinational groups, 233.8
- demand for, 233
- distribution of taxpayer's portion of, Reg. 209
- educational status, Reg. 203
- electric, gas or steam corporations, Reg. 213
- electronic filing required, Reg. 205.1
 - penalty, 162(7.02)
- electronic funds transfers, 244.2(1), 244.6
- electronic mail of, Reg. 209(3)–(5)
- eligible funeral arrangement, Reg. 201(1)(f)
- email of, Reg. 209(3)–(5)
- emigration, value of assets, 128.1(9)
- employees stock option deferral, Reg. 200(5)
- employees profit sharing plan, Reg. 212
- energy conversion program, Reg. 224
- farm support payments, Reg. 234–236
- federal government contract, Reg. 237
- first home savings account, Reg. 219
- foreign affiliate, 233.4
- foreign plan PSPA, Reg. 8402(2)
- foreign property, investment in, 233.3
- foreign trust
 - distributions from, 233.5
 - indebtedness to, 233.5
 - transfers to, 233.2(4)
- government contract, Reg. 237
- government-sponsored retirement arrangement, Reg. 8402.1
- home insulation program, Reg. 224
- interest expense denied, transferred to other group member, 18.2(5)
- international electronic funds transfers, 244.2(1), 244.6
- journalism organization, 149.1(14.1)
- labour organization or labour trust, 149.01 [repealed]
- legal representative, Reg. 206
- life insurer, Reg. 217
- making of regulations re, 221(1)(d)
- NISA Fund No. 2, Reg. 201(1)(e)
- non-profit organization, 149(12), 150(1)(a)
- non-profit R&D corporation, 149(7)
- non-qualified investment acquired by RRIF, Reg. 215(3)
- non-qualified investment acquired by RRSP, Reg. 214(2)
- non-qualified investment acquired by TFSA, Reg. 223(3)
- non-resident claiming treaty protection, 150(1)(a)(ii)
- non-resident transactions, 233.1–233.7
- oil substitution program, Reg. 224
- Part IV.1 tax, 187.5
- Part VI.1 tax, 191.4(1)
- partnership, Reg. 229, 229.1
- past service pension adjustment, Reg. 8402
- patronage payments, Reg. 218
- penalty for failure to file electronically, 162(7.02)
- penalty for failure to make, 162(7)(a)
- pension adjustment, Reg. 8401
- pension adjustment correction, Reg. 8402(4), 8402.01(4.1)
- pension adjustment reversal, Reg. 8402.01
- political contributions, 230.1(2), Reg. 2001
- pooled registered pension plan, Reg. 213
- public
 - registered charity, 149.1(14)
- public partnership, Reg. 229.1
- public trust, Reg. 204.1
- qualified investments, Reg. 221
- RRIF loss carryback to deceased's return, Reg. 215(6)
- RRSP loss carryback to deceased's return, Reg. 214(6)
- registered Canadian amateur athletic association, 149.1(14)
- registered education savings plan, 146.1(13.1), (15)
- registered journalism organization, 149.1(14.1)
- registered pension plan, Reg. 8409
- registered retirement income funds, Reg. 215
- registered retirement savings plan, Reg. 214, 214.1
- reportable transactions, 237.3(2)
- resource flow-through shares, Reg. 228
- SR&ED corporation, 149(7)
- security transactions, Reg. 230
- social assistance payment, Reg. 233
- Social Insurance Number, use of, 237(2)
- specified retirement arrangement PSPA, Reg. 8402(3)
- stock option deferral, Reg. 200(5)
- students, Reg. 203
- TFSA, Reg. 223
- tax shelter
 - participant, 237.1(6), 237.3(2)
 - promoter, 237.1(7), 237.3(2)
- transactions with non-residents, 233.1–233.7
- trust, Reg. 204, 204.1
- trust or corporation re Part XI tax, Reg. 207
- tuition fees, Reg. 203
- union, 149.01 [repealed]
- Universal Child Care Benefit, Reg. 200(6)
- video tapes, Reg. 225
- withholding of tax, Reg. 210
- workers' compensation payment, Reg. 232

Inheritance, *see also* Death of taxpayer
• debt forgiveness rules do not apply, 80(2)(a)

In-home care of relative
• before 2017, tax credit, 118(1)B(c.1)

Initial amounts
• defined, for transfer pricing rules, 247(2.02)

Initial deadline
• defined, for insurance demutualization, 139.1(1)

Initial non-qualified investment
• defined, 204

Initial transportation charges
• defined (for pre-1966 cars), Reg. 1102(11)

Injection substances
• deduction for, 20(1)(mm)

Injury, personal, property acquired as award for income from, exempt, 81(1)(g.1), (g.2)

In-laws, dependent, 118(6)(b)

Innovative regulatory capital, *see* Regulated innovative capital

Input tax credit, *see* Goods and services tax (GST): input tax credit

Inquiry

- authorized by Minister, 231.4
- compliance required, 231.5(2)
- rights of person subjected to, 231.4(6)
- rights of witness at, 231.4(5)
- seizure of documents
 - copies of, 232(13)

Insider of a corporation

- defined, Reg. 4803(1)

Insolvency, *see also* Bankruptcy; Financial difficulty (taxpayer in)

- insurance corporation, group disability insurance top-up payments, 6(17), (18)

Inspection, *see* Audit**Inspector**

- defined, for surveys under *Canada Shipping Act*, Reg. 3600(2)

Installation project

- more than 12 months, constituted permanent establishment, Canada-U.S. Tax Treaty:Art. V(3)

Instalment base

- defined
 - corporations, 157(4), Reg. 5301
 - individuals, farming or fishing business, 155(2), Reg. 5300
 - other individuals, 156(3), 161(9), Reg. 5300

Instalment payments (Instalments)

- capital and income combined, 16(1)
- ceasing to be resident in Canada, 128.1(5)
- dependent on use, 12(1)(g)
- Part VI.2 tax paid over 5 years, 191.5(9)
- sale of property, *see* Reserve
- tax, of
 - amounts deemed to be, 161(8)
 - annual, deceased taxpayer's, Reg. 1001
 - contra interest, 161(2.2)
 - corporations, 157
 - *de minimis* rule, 156.1(1), 157(2.1)
 - death of taxpayer, not required after, 156.1(3)
 - deficient
 - interest offset method, 161(2.2)
 - interest payable, 161(2)
 - limitation re corporations, 161(4.1)
 - penalty, 163.1
 - when certain tax credits deemed paid, 161(10)
 - estate, whether exempt, 156.1(2)(c)
 - farming or fishing income (individuals), 155, 156.1(2)
 - individuals, 156, 156.1
 - instalment base, defined, 161(9)(a), Reg. Part LIII
 - late, penalty for, 163.1
 - mutual fund trust, 156(2), 157(2)
 - offset interest, 161(2.2)
 - Part XII.3 tax, 211.3
 - SIFT trust, 157(2)
 - small corporation, 157(1.1)–(1.5)
 - transfers between accounts, 221.2
 - trust distributing property to non-resident, 107(5.1)

Instalment sale

- reserve for capital gain, 40(1)(a)(iii)

Instalment threshold

- defined, 156.1

Institution

- costs of care in, as medical expense, 118.2(2)(e)
- gifts to
 - by corporation, deduction for, 110.1(1)(c)
 - by individual, credit for, 118.1(1)“total cultural gifts”

Instrument, *see* Musical instrument**Insulation grant**, *see* Home insulation grant**Insulator (heat and frost)**

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

Insulin, medical expense, 118.2(2)(k)**Insurance**

- accidental death, not included in group life insurance benefit, Reg. 2700(2)
- corporation, *see* Insurance corporation
- defined to include reinsurance, 138(12)
- group plans
 - employer's contributions not includable in employee's income, 6(1)(a)(i)
 - life insurance, portion of premium taxable, 6(4)
 - paid-up, deduction for, 18(9.01)
- policy, *see* Insurance policy
- premiums, *see* Premium
- proceeds
 - in respect of depreciable property, taxable, 12(1)(f)
- risks in Canada, by foreign affiliate, 95(2)(a.2)
- sickness, accident, etc., benefits taxable, 6(1)(f); ITAR 19

Insurance agent or broker

- reserve for unearned commissions, 32

Insurance contract

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

Insurance corporation, *see also* Financial institution; Life insurance corporation

- amalgamation, 87(2.2)
- amortized cost, where meaning varied, 138(13)
- bad debts
 - deduction for, 20(1)(p)(ii)
 - inclusion in income, 12.4
- cash flow adjustment, Reg. 2412
- computation of income, 138(1), (6), 138(9), 140
- deduction for amounts paid or credited to policyholders, 140(1)
- deductions not allowed, 138(5)–(5.2), (8)
- deemed not to be private corporation, 141.1
- defined, 248(1)
- definitions, 138(12)
- demutualization, 139.1
- deposit, *see* Deposit insurance corporation
- disposition of Canadian securities, 39(5)(e)
- earthquake reserves, Reg. 1400(3)L
- electronic filing not required, Reg. 205.1(2)(a)
- exempt under Part IV, 186.1(b)
- farmers and fishermen, of
 - exemption for, 149(1)(t), 149(4.2)
 - limitation, 149(4.1)
- foreign affiliate, *see* Foreign affiliate: insurer
- gross investment revenue, defined, 138(12)
- guarantee fund, deduction for payment to, Reg. 1400(3)G
- guarantees etc.
 - acquired from, in amalgamation, 87(2)(h)(iii)
 - reserve for, 20(1)(l.1)
- IFRS 17 changes (2023), transitional rules, 138(16)–(25), 142.51
- inclusion in computing income for 1988 taxation year, 140(2)
- insolvent, group disability insurance top-up payments, 6(17), (18)
- liabilities of, determination for debt forgiveness reserve, 61.3(1)(b)C(ii)(B), (C)
- life, *see* Life insurance corporation
- loan/lending asset
 - acquired from, in amalgamation, 87(2)(h)(ii)
 - reduction in value of
 - limitation on deduction re, 18(1)(s)
- loans etc. acquired in ordinary course of business, 20(27)
- mark-to-market rules apply, 138(10)
- mutualization proposal, 139
- negative reserves, 12(1)(e.1), 20(22), Reg. 1400(2)

Index

Insurance corporation (*cont'd*)

- non-resident, Reg. 219(4)–(8), 800–805.1, 2401
- • branch tax elections, Reg. 2403
- • change in use rules, 138(11.3)–(11.41), (11.6)
- • computation of income, 138(11.91)
- • domestication of branch operation, 138(11.5)
- • eligible property for transfer to corporation by shareholder, 85(1.1)(b)
- • excluded property, Reg. 810
- • qualified related corporation, 138(12)
- • registered, *see* Registered non-resident insurer
- • transfer of insurance business, 138(11.5)
 - • • anti-avoidance provisions, 138(11.7)
 - • • computation of income, 138(11.92)
 - • • contributed surplus, computation of, 138(11.9)
 - • • depreciable property, rules re, 138(11.8)
 - • • paid-up capital, computation of, 138(11.7)
- non-segregated property, 138(12)
- participating life insurance policy, defined, 138(12)
- policy loan, defined, 138(12), 148(9)
- policy reserves, Reg. 1400–1408
 - • life insurance, 138(3)(a)(i)
 - • negative, 20(1)(e.1), 20(22), Reg. 1400(2)
 - • non-life insurance, 20(7)(c), Reg. 1400
 - • regulations, Reg. 1400–1408
- property acquired on default in payment, 138(11.93)
- “property used by it in the year in, or held by it in the year in the course of”, 138(12)
 - • defined, Reg. 2400
 - • registered, *see* Registered non-resident insurer
- regulations, Reg. Part XXIV
- reserve for unpaid claims, *see also* policy reserves; unpaid claims reserve adjustment
 - • life insurance, 138(3)(a)(ii)
 - • limitation, 18(1)(e.1)
 - • negative, 12(1)(e.1), 20(22), Reg. 1400(2)
- security used or held by
 - • “eligible property” for transfer to corporation by shareholder, 85(1.1)(g)
- segregated funds of, 138.1, Reg. Part LXI
- subsidiary, wound up, 88(1)(g)
- surplus funds derived from operations, 138(12)
- taxable capital gains, 138(2)(b), 142
- taxable income earned in a province, Reg. 403
- transfer of insurance business
 - • by non-resident insurer, 138(11.5)
 - • by resident insurer, 138(11.94)
- transitional rules for accounting rule changes (2023), 138(16)–(25), 142.51
- unpaid claims reserve adjustment, *see also* reserve for unpaid claims
 - • claims incurred but not reported, Reg. 1400(3)D, E
 - • deduction, 20(7), Reg. 1400(3)D, E
 - • variation in tax basis and amortized cost, 138(13)

Insurance holding corporation

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

Insurance policy

- acquisition costs
- • not deductible to insurer, 18(9.02)
- disposition of, 148
 - • no capital gain, 39(1)(a)(iii)
 - • no capital loss, 39(1)(b)(ii)
- life, *see* Life insurance policy
- loan, *see* Policy loan (life insurance)
- reserves (insurer), *see* Insurance corporation: policy reserves; Insurance corporation: reserve for unpaid claims
- rider, *see* Rider

Insurance proceeds

- constitute proceeds of disposition, 13(21)“proceeds of disposition”(c), 54“proceeds of disposition”(c)
- rollover where property replaced, 13(4), (4.1), 44

Insurance swaps

- application of FAPI, 95(2)(a.21), (a.22)

Insured annuity

- leveraged, *see* LIA policy

Insurer, *see also* Insurance corporation

- defined, re life annuity contracts, 148(10)(a), Reg. 217(1)

Intangible property, *see also* Goodwill

- patents, Reg. Sch. II:Cl. 14, Sch. II:Cl. 44
- relating to road, bridge, townsite, etc., capital cost, 13(7.5)(c)

Integration

- capital dividend flow-through, 83(2), 89(1)“capital dividend account”(b)
- corporate and personal tax, 82(1)(b), 121
- intercorporate dividend flow-through, 82(1)(a), (a.1), 112(1)
- Part IV tax flow-through, 186(1)(b)

Intellectual property, *see* Copyright; Patent; Trade mark, representation expenses

Inter vivos trust, *see also* Trust (or estate)

- defined, 108(1)

Interac Corp.

- prescribed payment card corporation share, Reg. 9002.1(a)(i), (ii)

Inter-American Development Bank

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

Intercorporate dividends generally tax-free, 112, 113

Interest (in property, etc.)

- beneficial, in trust, meaning of, 248(25)
- capital, in trust, *see also* Trust (or estate)
- family farm partnership, in, 110.6(1)
- family fishing partnership, in, 110.6(1)
- income, in trust, *see also* Trust (or estate)
- life, in real property, *see* Life estate in real property
- partnership, *see* Partnership interest
- policy loan, re, defined, 138(12), Reg. 1408(1)
- qualifying, *see* Qualifying interest (in respect of foreign affiliate)
- real property, in, defined, 248(4)
- taxable Canadian property, in, 248(1)“taxable Canadian property”(1)
- trust, *see* Trust (or estate): interest in

Interest (money)

- accrued
 - • corporations, partnerships, trusts, 12(3)
 - • deduction on disposition of debt obligation, 20(21)
 - • deemed, 12(9)
 - • inclusion in income, 12(3), (4), (9)
 - • individuals, 12(4)
 - • on amalgamation, 87(2)(j.4)
 - • prescribed debt obligation, on, 12(9), Reg. 7000
 - • to date of death, 70(1)(a)
- allowable refund of N.R.O., on, 133(7.01), (7.02)
- annual reporting, *see* accrued (*above*)
- benefit from loan, deemed to be, 80.5
- bond
 - • accrued, to date of transfer, 20(14)
 - • • information returns, Reg. 211
 - • purchased at discount, 16(3)
- borrowed money used to acquire land, on
 - • defined, 18(3)“interest on debt relating to the acquisition of land”
 - • not deductible, 18(2), (2.1)
 - • partner, by, 18(2.1)

Index

Interest (money) (*cont'd*)

- borrowed money used to acquire property no longer owned, 20.1(1)
 - borrowed money used to invest in deferred income plan, 18(11)
 - borrowed money used to invest in shares, 20(1)(c)
 - capital and, combined, 16(1)
 - on expropriation assets, 80.1(3)
 - capital gains refund, on
 - mutual fund corporation, 131(3.1), (3.2)
 - mutual fund trust, 132(2.1), (2.2)
 - capitalization into cost of property, 21
 - compounded daily, 248(11)
 - coupons to be identified as to taxable and non-taxable obligations, 240(2)
 - debt obligation, on, 20(14.1)
 - mark-to-market property of financial institution, 142.5(3)
 - debt relating to the acquisition of land, on
 - defined, 18(3)“interest on debt relating to the acquisition of land”
 - deductible, *see also* borrowed money used ... (*above*)
 - general rule, 20(1)(c)
 - limited to 30% of EBITDA, *see* Excessive interest and financing expenses limitation (EIFEL)
 - paid under *Income Tax Act*, not deductible, 18(1)(t)
 - thin capitalization restrictions, 18(4)–(8)
 - deduction by certain corporations, limitation on, 18(4)–(6)
 - deduction restrictions, *see* deductible: limited to 30% (*above*)
 - deemed
 - amount paid by credit union re member’s share, 137(4.1)
 - benefit from loan, 80.5
 - certain shares, on, 258(5)
 - non-resident tax, 214(6), (14)
 - preferred shares, on, 258(3)
 - deemed received by corporation on loan to non-resident, 17
 - defined, *Income Tax Conventions Interpretation Act* s. 6
 - dividend refund, on, 129(2.1), (2.2)
 - escalating interest GICs, Reg. 7000(2)(c.1)
 - expense
 - amount deductible, 20(1)(c), (d)
 - compound, 20(1)(d)
 - election to capitalize, 21(1)
 - employee’s automobile or aircraft, 8(1)(j)(i)
 - limitation on deduction by certain corporations, 18(4)–(6)
 - minimum tax, 127.52(1)(b), (c), (c.2), (e.1)
 - policy loans, on, 20(2.1), 138(12)“interest”, Reg. 4001
 - expropriation assets, on
 - election re, 80.1(2)
 - forgiven, 80(2)(b)
 - fully exempt, *see* Fully exempt interest
 - income bond, on, deemed dividend, 15(3)
 - non-resident corporation, 15(4)
 - income from business or property, 12(1)(c)
 - whether specified investment business, 125(7)“specified investment business”
 - increasing rates, income accrual, Reg. 7000(2)(c.1)
 - instalments of tax, late or insufficient, 161(2)
 - additional 3% payable, 161(3)
 - limitation, 161(4), (4.1)
 - not deductible, 18(1)(t)
 - offset, 161(2.2)
 - scientific research tax credit, when deemed paid, 161(10)
 - share-purchase tax credit, when deemed paid, 161(10)
 - where not payable, 161(2.1)
 - interest repaid, on, 164(4)
 - loss carryback, effect of, 161(7)
 - loss of source of income, 20.1(1)
 - obligation issued at a discount, 16(3)
 - offset
 - arrears interest against refund interest, 161.1
 - early instalments against late instalments, 161(2.2)
 - paid on death duties, deduction, 60(d)
 - paid or payable, deduction for, *see* deductible (*above*)
 - paid to non-resident, withholding tax, 212(1)(b)
 - by wholly-owned subsidiary, 218
 - to U.S. resident, Canada-U.S. Tax Treaty:Art. XI
 - participating debt, *see* Participating debt interest
 - payable
 - carryback re minimum tax, no effect, 161(7)
 - penalty, on, 161(11)
 - penalty or bonus, treated as interest expense, 18(9.1)
 - prepaid, deduction for, 18(9), (9.2)–(9.8)
 - prescribed rate, Reg. 4301
 - property transferred from spouse, 74.1
 - rate of, Reg. 4301
 - rate reduction payments, treated as interest expense, 18(9.1)
 - refunds and repayments, on, 164(3)–(4)
 - repayment of, deduction for, 20(1)(II)
 - spouse, property transferred to, 74.1, *see also* Attribution rules
 - stapled security, on, 18.3(3)
 - student loan, paid, credit for, 118.62
 - tax withheld but not remitted, on, 227(9.3)
 - unclaimed at year-end
 - withholding tax, 153(4)
 - effect of remittance, 153(5)
 - unpaid tax, on, 161(1), 227(9.3)
 - adjustment of foreign tax, 161(6.1)
 - grace period to pay balance, 161.2
 - income in blocked currency, 161(6)
 - loss carryback, effect of, 164(5), (5.1)
 - none, re participation certificate, 161(5)
 - not deductible, 18(1)(t)
 - offset
 - arrears interest against refund interest, 161.1
 - early instalments against late instalments, 161(2.2)
 - Part III, 185(2)
 - Part III.1, 185.2(2)
 - Part IV, 187(2)
 - Part V, 189(7)
 - Part X, 202(5)
 - Part XII.3, 211.5
 - Part XII.4 tax, 211.6(5)
 - Part XII.5 tax, 211.82
 - retroactive to application date of provision, 221.1
 - up to \$25, may be cancelled, 161.3
 - waiver of, 220(3.1)
 - withholding tax, 212(1)(b)
- **Interest and financing expenses**
 - defined, for interest deduction restrictions, 18.2(1), (13), 248(1)
 - interest deduction limited to 30% of EBITDA, 18.2(2)
- **Interest and financing revenues**
 - defined, for interest deduction restrictions, 18.2(1), (12), (14), 248(1)
 - reduces limitation on interest expense, 18.2(2)A
- **Interest coupon holder**
 - defined, 212(21)(a)
- **Interest coupon stripping**
 - anti-avoidance rules, 212(1)(b)(i)(B), 212(21)–(23)
- **Interest-free loan**, *see* Loan: interest-free
- **Interest gross-up period**
 - defined, for non-resident trust rules, 94(15)(c)(ii)C
- **Interest in a family farm or fishing partnership**
 - defined, 70(10)
 - rollover, 70(9)–(9.31), 73(3)–(4.1)
- **Interference with remittances of tax withheld**, 227(5.2)–(5.4) (1995 draft, abandoned)

Index

Intergenerational transfer

- attribution of income or loss, 74.1(2)
- business transfer, 84.1(2)(e), 84.1(2.3)–(2.32)
- capital gains reserve, 10 years, 40(1.2)
- gradual, 84.1(2.32)
- immediate, 84.1(2.31)
- joint liability of persons electing, 160(1.5)
- reassessment deadline extended, 152(4)(b.8)
- farm or fishing property
- *inter vivos*, 73(3)–(4.1)
- on death, 70(9)–(9.31)

Interim receiver

- withholding tax, liability for, 227(5), (5.1)(d)

Internal Revenue Service (U.S.), *see also* United States

- collection of Canadian tax, Canada-U.S. Tax Treaty:Art. XXVI A
- competent authority procedures, Canada-U.S. Tax Treaty:Art. XXVI
- exchange of information with CRA, Canada-U.S. Tax Treaty:Art. XXVII

Internal waters

- defined, *Interpretation Act* 35(1)

International agencies, prescribed, Reg. 806.1

International Air Transport Association

- employment income of non-Canadians, deduction for, 110(1)(f)(iv)

International Bank for Reconstruction and Development

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

International banking centre until 2013, 33.1

International development assistance programs

- person working on deemed resident in Canada, 250(1)(d)
- prescribed, Reg. 3400

International Finance Corporation

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

International Financial Reporting Standards

- effect of, 9(1) (Notes)
- IFRS 17 changes for insurers (2023), 138(16)–(25)
- insurers, application to, 138(17.1)
- liabilities and reserves to be computed gross of reinsurance, Reg. 2400(1)“Canadian reserve liabilities”
- transition year, 138(12)“transition year”(b)
- meaning of, 138(12.2)
- transitional changes for insurers (2023), 138(16)–(25)

International organization

- defined, for Common Reporting Standard, 270(1)
- employment income from
- deduction, 110(1)(f)(iii)
- tax credit, 126(3)
- interest paid to, withholding tax exemption, Reg. 806

International shipping

- aircraft used in
- lease payments exempt from withholding tax, 212(1)(d)(xi)
- corporation, residence of, 250(6)
- defined, 248(1)
- income of non-resident from, exempt, 81(1)(c)
- non-resident’s income from, exempt, 81(1)(c)
- residence of shipping corporation, 250(6)–(6.04)
- service provider deemed to have international shipping as principal business, 250(6.02), (6.03)

International sport federation, eligibility requirements of, *see* Amateur athlete trust

International tax

- advisory panel, *see* Advisory Panel on International Taxation
- conventions, *see* Tax treaty
- dividends received from foreign corporations, 90, 113

- foreign accrual property income, 91, 95
 - foreign tax credit, 126, *see also* Foreign tax credit
 - treaties, *see* Tax treaty
 - United States, rules re, *see* United States
 - withholding tax, 212, *see also* Withholding
- ### International traffic, *see also* International shipping
- aircraft operated by non-resident in
 - capital gains on, 248(1)“taxable Canadian property”(b)(ii)
 - income of non-resident exempt, 81(1)(c)
 - residence of corporation, 250(6)
 - capital tax on ships and aircraft, Canada-U.S. Tax Treaty:Art. XXIII:3
 - defined, Canada-U.S. Tax Treaty:Art. III:1(h); Canada-U.K. Tax Treaty:Art. 3.1(i)
 - employee employed in, Canada, Canada-U.S. Tax Treaty:Art. XV:3
 - profits from, Canada-U.S. Tax Treaty:Art. VIII
- ### Interpolation time
- re life insurance policy coverage, defined, Reg. 1401(3)
- ### Interpretation, 248–260
- definitions, 248(1)
 - *Income Tax Conventions Interpretation Act*, *see* Table of Contents
 - *Interpretation Act*, *see* Table of Contents
- ### Interpretation services
- sign language
 - disability supports deduction, 64(a)A(ii)(A)
 - medical expense credit, 118.2(2)(1.4)
- ### Inventory
- adding property to, non-resident, 10(12), (14)
 - adjustment
 - amalgamation, on, 87(2)(j.1)
 - deduction from income, 20(1)(ii)
 - inclusion in income, 12(1)(r)
 - adventure in the nature of trade, 10(1.01)
 - superficial loss rule, 18(14)–(16)
 - allowance, repealed [was 20(1)(gg)]
 - amalgamation, on, 87(2)(b)
 - artistic endeavour, of, 10(6)–(8)
 - ceasing to use in business, non-resident, 10(12), (14)
 - cost of
 - non-deductible expenses included in, 10(1.1)
 - defined, 12(12)(b), 248(1)
 - flipped property (residential) deemed to be, 248(1)
 - specified debt obligation and mark-to-market property excluded, 142.6(3)
 - “eligible property” for transfer to corporation by shareholder, 85(1.1)(f)
 - examination of property in, 231.1
 - exploration and development shares, 66.3(1)
 - farming business, of, *see* Farming: inventory
 - financial institutions, *see* Mark-to-market property
 - manner of keeping, Reg. 1800
 - mark-to-market rules, *see* Mark-to-market property
 - non-resident, 10(12)–(14)
 - removing property from, non-resident, 10(12), (14)
 - reserve on sale of, 20(1)(n), 20(8)
 - where property repossessed by creditor, 79.1(4)
 - sale of
 - after ceasing to carry on business, 23(1)
 - included in income, 9(1)
 - repossession by vendor in same taxation year, 79.1(5)
 - share held as, stop-loss rules on disposition, 112(4)–(4.2)
 - transfer to corporation, 85(1)(c.1), (e.3)
 - valuation of, 10, Reg. 1801
 - adventure in the nature of trade, 10(1.01), (9)
 - change in control of corporation, 10(10)
 - consistency required, 10(2.1)

- Inventory (*cont'd*)
- farming business, 28(1.2), (1.3), Reg. 1802
 - incorrect, 10(3)
 - shares, 112(4.1)
 - writedown, 10(1)
 - adventure in the nature of trade, 10(1.01), (9)
 - change in control of corporation, 10(10)
 - derivatives excluded, 10(15)
 - of loan, denied, 18(1)(s)
 - superficial loss rule, 18(14)–(16)
- Investing in a Diversified Alberta Economy Act**
- prescribed labour-sponsored venture capital corporation, Reg. 6700(h)
 - share registered under, qualified investment for RRSP etc., Reg. 4900(1)(i.14)
- Investment**
- allowance, *see* Investment allowance
 - business, *see* Investment business
 - corporation, *see* Investment corporation
 - counselling, *see* Investment counselling fees
 - defined
 - for foreign affiliate dumping, 212.3(10)
 - for SIFT trust and partnership distributions, 122.1(1)
 - income, *see* Investment income
 - offshore, *see* Offshore investment fund
 - prohibited, *see* Prohibited investment
 - property, *see* Investment property
 - qualified, *see* Qualified investment
 - registered, tax re, 204.4–204.7
 - tax credit, *see* Investment tax credit
 - tax shelter, *see* Tax shelter: investment
 - time, *see* Investment time
- Investment advice**, *see* Investment counselling fees
- Investment allowance**
- defined
 - for large corporations tax, 181.2(4), 181.3(4)
 - for Part XIV branch tax, 219(1)(j), Reg. 808
- Investment business**, *see also* Specified investment business
- of foreign affiliate
 - defined, 95(1)
 - excluded from active business, 95(1)“active business”(a)
 - start-up rule, 95(2)(k)(i)
- Investment club**
- tax treatment, Information Circular 73-13 (no ITA provision)
- Investment contract**, *see also* Debt obligation
- anniversary day
 - accrued interest, 12(4)
 - defined, 12(11)
 - defined, 12(11)
- Investment contract corporation, prescribed**, Reg. 6703
- exempt from Part IV tax, 186.1(b)
- Investment corporation**, 130
- deduction from tax, 130(1)
 - defined, 130(3)(a), 248(1)
 - election not to be restricted financial institution, 131(10)
 - election re capital gains dividend, Reg. 2104
 - information return where share claimed to be qualified investment, Reg. 221
 - mortgage, *see* Mortgage investment corporation
 - not subject to mark-to-market rules, 142.2(1)“financial institution”(c)(i)
 - special tax rate, 130
 - taxed capital gains, 130(3)(a)
 - that is not mutual fund corporation, 130(2)
- Investment counselling fees**
- deductible, 20(1)(bb)
 - for FHSA, RRSP, RRIF or TFSA, non-deductible, 18(1)(u)
- Investment dealer**, *see also* Financial institution; Registered securities dealer
- defined, 142.2(1)
 - subject to mark-to-market rules, 142.2(1)“financial institution”
- Investment entity**
- defined, for Common Reporting Standard, 270(1)
- Investment expense, defined**, 110.6(1)
- Investment fund**
- defined, for loss restriction event rules for trusts, 251.2(1)
- Investment-grade debt**
- qualified investment for RRSP etc., 204“qualified investment”(c.1) (formerly Reg. 4900(1)(I)(i.3), (o)); Reg. 4900(1)(j.2)
- Investment income**, *see also* Property: income from
- aggregate, *see* Aggregate investment income
 - associated corporation, from, 129(6)
 - Canadian, defined, 129(4)
 - defined, 110.6(1)
 - foreign, defined, 129(4)
 - information returns, Reg. 201
 - life insurer’s, tax on, 211–211.5
 - refundable tax on, 123.3
- Investment interest**
- in a business, ITAR 23(5)“investment interest”, “1971 receivables”
- Investment loss**
- business, *see* Business investment loss
- Investment manager**
- defined, 44.1(1)“eligible pooling arrangement”
- Investment property**
- defined
 - for deposit insurance corporation, 137.1(5)
 - foreign affiliate, 95(1)
 - insurer, Reg. 2400(1)
- Investment shortfall**
- for labour-sponsored venture capital corporation, 204.82(2.1), (2.2)
- Investment tax credit**, 127(5)–(36)
- addition to, 127(10.1)
 - amalgamation, on, 87(2)(j.6)
 - annual limit, defined, 127(9)
 - apprenticeship expenditures, 127(9)“investment tax credit”(a.4)
 - assistance or government assistance, effect of, 127(18)–(21)
 - continuation of predecessors, 87(2)(qq)
 - associated corporations, 127(10.3)
 - failure to file agreement, 127(10.4)
 - Atlantic provinces, 127(9)“investment tax credit”(a), 127(9)“specified percentage”(a)(iii)(D), (a.1)
 - available-for-use rule, 127(11.2), 248(19)
 - CCUS, *see* CCUS tax credit
 - carbon capture, *see* CCUS tax credit
 - carryforward, 127(9)“investment tax credit”(c)–(h)
 - transitional rules for change to 20 years, 127(9.01), (9.02), (36)
 - certified property
 - ascertainment of, 127(10)(a), (b)
 - prescribed areas, Reg. 4602
 - child care space creation, 127(9)“investment tax credit”(a.5)
 - recapture if not kept for 5 years, 127(27.1)–(27.12)
 - conversion of property to commercial use, 127(9)
 - cooperative corporation, 127(6)
 - critical minerals, 127(9)“investment tax credit”(a.21)
 - defined, 127(9), (11.1), (12)–(12.2)
 - definitions, 127(9)
 - depreciable property acquired before change of control, 13(24), (25)
 - expenditure limit, determination of, 127(10.2), (10.6)
 - filing deadline, 37(11), 127(9)“investment tax credit”(m)

Index

- Investment tax credit (*cont'd*)
 - flow-through critical mineral mining expenditure, 127(9)“investment tax credit”(a.21)
 - flow-through mining expenditure, 127(9)“investment tax credit”(a.2)
 - included in income, 12(1)(t)
 - year of death, 70(1)(b)
 - limited partner, of, 127(8.1)
 - non-arm’s length transactions, 127(11.6)–(11.8), (24)
 - overpayment of tax as consequence of, 164(5), (5.1)
 - parent’s, after subsidiary wound up, 88(1)(e.3)
 - partnership, allocation to partners, 127(8)–(8.5)
 - carbon capture (CCUS) credit, 127.44(10)
 - non-limited partners, 127(8.3)
 - recapture of, 127(28)
 - pre-production mining expenditures, 127(9)“investment tax credit”(a.3)
 - qualified property, Reg. 4600
 - defined, 127(9), (11)
 - R&D, *see* scientific research (*below*)
 - reassessment, 152(6)(d)
 - recapture of, 127(27)–(36)
 - deduction in later year, 37(1)(c.2)
 - refundable, 127.1
 - defined, 127.1(2)
 - depreciable property acquired before change of control, 13(24), (25)
 - renunciation of, by general partner, 127(8.4)
 - repayment of assistance, 127(9)“investment tax credit”(e.1), 127(10.7)
 - scientific research
 - basic 20% credit, 127(9)“investment tax credit”(a.1)
 - extra 15% credit, 127(10.1)
 - small business, 127(9)“qualified small-business property” [repealed], 127(9)“specified percentage”(i)
 - specified percentage, 127(9)
 - super-R&D allowance by province, federal bonus, 127(9)“super-allowance benefit amount”, 127(10.1)(b)
 - trusts, allocation to beneficiaries, 127(7)
 - reduces cumulative Canadian exploration expense, 127(12.3)
 - unpaid amounts, 127(26)
 - where control of corporation acquired, 127(9.1), (9.2)
 - windup of corporation, flow-through to parent, 88(1)(e.3)
 - Investment time**
 - defined
 - for foreign affiliate dumping, 212.3(1)
 - Investment trust**, *see* Mutual fund trust
 - Investor**
 - defined, for intercorporate dividends, 112(2.6)
 - Involuntary dispositions**
 - resource property, 59.1
 - Ireland**, *see also* Foreign government
 - stock exchange recognized, 262
 - universities, gifts to, Reg. Sch. VIII, s. 10
 - Iron**
 - processing ore, whether manufacturing or processing, 125.1(3)“manufacturing or processing” Reg. 5203
 - Iron lung, as medical expense**, 118.2(2)(i)
 - Ironworker**
 - apprenticeship job creation credit, 127(9)“investment tax credit”
 - Irrigation pipe**
 - construction costs deductible by farmer, 20(1)(ee)
 - Israel**, *see also* Foreign government
 - bonds of, *see* Israel Bonds
 - Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(c)–(e) [repealed]
 - debt of, *see* Israel Bonds
 - stock exchange recognized, 262
 - universities, gifts to, Reg. Sch. VIII, s. 8
 - Israel Bonds**
 - eligible for RRSPs and RRIFs, 204“qualified investment”(c.1) (formerly Reg. 4900(1)(o))
 - Issue estoppel**, 169(2)
 - Issuer**
 - FHSA, defined, 146.6(1)
 - RDSP, defined, 146.4(1)“disability savings plan”(a)(i)
 - RRSP, defined, 146(1), Reg. 214(7)
 - TFSA, defined, 146.2(1)
 - Italy**, *see also* Foreign government
 - stock exchange recognized, 262
- ## J
- JEC**, *see* Joint exploration corporation
 - JJ Herbert Family Trust case overruled**, 214(3)(f)(i)(C)
 - Jail**, *see* Offences
 - Jamaica**, *see also* Foreign government
 - universities, gifts to, Reg. Sch. VIII, s. 15
 - Japan**, *see also* Foreign government
 - currency of, use as functional currency, 261(1)“qualifying currency”(c.1)
 - film or video under treaty co-production, Reg. 1106(3)(c)
 - stock exchange recognized, 262
 - Jeopardy assessment or jeopardy order**
 - re collection restrictions, 225.2(2)
 - refund not to be paid, 164(1.2)
 - Jesuit**
 - income of, not taxed, 110(2)
 - Jetty, capital cost allowance for**, Reg. Sch. II:Cl. 1(e), Sch. II:Cl. 3
 - Jewellery**, *see* Listed personal property
 - Jig, capital cost allowance**, Reg. Sch. II:Cl. 12(d)
 - Job coaching services**
 - disability supports deduction, 64(a)A(ii)(K)
 - Job retraining**
 - employment insurance benefit, not included in income, 56(1)(a)(iv)
 - reimbursed tuition fees, no credit unless included in income, 118.5(1)(a)(iii)
 - Joint and several liability**, *see* Liability for tax: joint and several
 - Joint contributor (to non-resident trust)**
 - attribution of trust’s income to electing contributors, 94(16)(a)A(ii)
 - defined, 94(1)
 - liability for joint contribution to trust, 94(17)
 - Joint election**, *see also* Election(s)
 - defined, for pension income splitting, 60.03(1)
 - Joint exploration corporation**
 - agreed portion, defined, 66(15)
 - defined, 66(15)
 - share, adjusted cost base, 53(2)(f.1)
 - shareholder corporation, defined, 66(15)
 - Joint liability**, *see* Liability for tax: joint and several
 - Joint partner trust**, *see* Joint spousal or common-law partner trust
 - Joint spousal or common-law partner trust**, *see also* Post-1971 spousal or common-law partner trust; Trust (or estate): spouse, for
 - deduction from income, 104(6)(b)B(i)
 - defined, 104(4)(a)(iv)(B), (C), 248(1)
 - distribution of property to person other than taxpayer or spouse, 107(4)(a)(iii)
 - preferred beneficiary election by, 104(15)(a)
 - principal residence exemption, 54“principal residence”(c.1)(iii.1)(A)

Joint spousal or common-law partner trust (*cont'd*)

- transfer by, to another trust, 104(5.8)
- transfer to, rollover, 73(1.01)(c)(iii)

Journalism, *see also* Qualified Canadian journalism organization; Qualifying journalism organization; Registered journalism organization

- digital news subscription credit, 118.02
- donations to, 149.1(1)“qualified donee”(b.1)
- online news subscription credit, 118.02
- refundable labour tax credit, 125.6

Judge, *see also* Court

- application to, re seized documents, 232(4), (8)
- bribery of, non-deductible, 67.5
- defined
- • for jeopardy assessment and collection, 225.2(1)
- • for search and seizure, 231
- income from professional practice, 24.1 [repealed]
- issue of search warrant, 231.3(1)–(4)
- pension plan, Reg. 8309
- powers in jeopardy proceedings, 223(11), (12)
- review of requirement to provide foreign-based information, 231.6(5)
- RRSP contribution room, Reg. 8309(2)

Judicial notice

- regulations, etc., 244(12)

Jurisdiction

- territorial, 244(3)

Juror's fees

- taxable, 3 (*per* IT-377R)

Jury duty, *see* Juror's fees

K

KST, *see* Knowledge sharing taxpayer

Kaolin

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

Key employee

- defined, for employee life and health trust (ELHT), 144.1(1)
- ELHT must not be operated primarily for, 144.1(3)(b)
- ELHT must not give more rights to, 144.1(2)(e), (f)

Kickbacks, *see* Illegal payments

Kiddie tax, *see* Income-splitting tax

Kidney machine, medical expense, 118.2(2)(i)

Kilns

- capital cost allowance for, Reg. Sch. II:Cl. 8

Kilometres driven, allowance for, Reg. 7306

Kinder Morgan pipeline corp taxable, Reg. 7100(k)

Kinship care, social assistance for

- payments do not increase net income, 81(1)(h.1)
- payments do not prevent Canada Workers Benefit single-parent status, 122.7(1.2)
- payments do not reduce Canada Child Benefit, 81(1)(h.1)

Kitchen utensils

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

Kiwi loans, *see* Weak currency debt

Know your customer procedures, *see* Anti-money laundering and know your customer procedures

Knowledge sharing CCUS project

- defined, for CCUS knowledge sharing, 211.92(1)
- requirement to submit knowledge-sharing report, 211.92(2)

Knowledge sharing taxpayer

- defined, for CCUS knowledge sharing, 211.92(1)
- requirement to submit knowledge-sharing report, 211.92(2)

Koller case overruled, 81(1)(g)

Korea, *see also* Foreign government

- film or video under treaty co-production, Reg. 1106(3)(d)

Kruger Inc. case overruled, 10.1(7)

Krull case overruled, 6(23)

Kuwait

- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(f) [repealed]

L

LCGE (Lifetime capital gains exemption), *see* Capital gains deduction

LCT, *see* Large corporations tax (Part I.3)

LIA policy

- annual accrual taxation, Reg. 306(1)
- defined, 248(1)
- FMV of property disposed of on death, 70(5.31)
- no deduction for premiums paid, 20(1)(e.2)
- no increase in CDA for death benefit, 89(1)“capital dividend account”(d)(ii)

LIF, *see* Life income fund

LIRA, *see* Locked-in retirement account

LLC, *see* Limited liability company (U.S.)

LLP, *see* Lifelong Learning Plan; Limited liability partnership

LLP balance

- defined, 146.02(1)

LNG, *see* Liquefied natural gas

LPP, *see* Listed personal property

LRE, *see* Loss restriction event

LRIP, *see* Low rate income pool

LSVCC, *see* Labour-sponsored venture capital corporation (LSVCC)

La Survivance case overruled, 256(9)

Laboratory services, as medical expense, 118.2(2)(o)

Labour Adjustment Benefits Act

- benefits under
- • income, 56(1)(a)(vi), Reg. 5502(a)
- • withholding of tax at source, 153(1)(m), Reg. 5502(a)
- repayment of overpayment under, deduction for, 60(n)(v)

Labour credit

- journalism, 125.6

Labour expenditure (re Canadian film/video tax credit)

- defined, 125.4(1)
- qualified, *see* Qualified labour expenditure (re Canadian film/video tax credit)

Labour mobility deduction, 8(1)(t)

Labour organization

- exemption, 149(1)(k)

Labour-sponsored funds tax credit

- acquisition of share by RRSP, 127.4(1)“qualifying trust”, 127.4(3) [repealed]
- computation of, 127.4(3), (4)
- cooling-off period, three years, 127.4(3)
- deduction of, 127.4(2)
- defined, 127.4(1), (6), 204.8(1), 211.7(1)
- eliminated by 2017, 127.4(5), (6)
- provincial, does not reduce ACB of investment, 53(2)(k)(i)(C)
- RRSP, 127.4(1)“qualifying trust”, 127.4(6)(a)
- recovery of
- • disposition of share, 211.8
- • national LSVCC, Reg. 6706
- • provincial LSVCC, 211.7

Labour-sponsored venture capital corporation (LSVCC), *see also* Labour-sponsored funds tax credit

- amalgamation or merger of, 127.4(1.1), 204.85
- deemed to be mutual fund corporation, 131(8)
- discontinuance of venture capital business, 204.8(2), 204.841
- dissolution of, 204.85

Index

- Labour-sponsored venture capital corporation (LSVCC) (*cont'd*)
 - no new applications accepted (federally) since March 21/13, 204.81(1)
 - prescribed, Reg. 6701
 - • deemed not a public corporation unless listed, 89(1)“public corporation”(b), (c)
 - • disposition of shares, capital loss, 40(2)(i)
 - • exempt from Part IV tax, 186.1(b)
 - • income eligible for dividend refund, 125(7)“specified investment business”
 - • prescribed assistance, Reg. 6702
 - • shares of
 - • • prescribed assistance, deduction from cost base, 53(2)(k)(i)(C)
 - province discontinuing LSVCC credit program, 204.81(8.3), (8.4)
 - provincial, tax on, 204.82(5)
 - registered, 204.8–204.87
 - • deemed to be prescribed LSVCC, Reg. 6701(c)
 - • defined, 248(1)
 - • disposition of, clawback, 211.8
 - • eligible investment, 204.8(1)
 - • refund of tax where no monthly deficiency, 204.83
 - • registration conditions, 204.81(1)
 - • return and payment of tax, 204.86
 - • revocation of registration, 204.81(6)–(9)
 - • shares of
 - • • acquisition by RRSP, 127.4(1)“qualifying trust”, 127.4(3)
 - • • adjusted cost base not reduced by credit, 53(2)(k)(i)(C)
 - • • credit for purchase, 127.4
 - • • redemption restrictions, 204.81(1)(c)(vii)
 - • • transfer restrictions, 204.81(1)(c)(vii)
 - • tax where insufficient eligible investments, 204.82
 - rules re, 131(11)
 - voluntary de-registration, 204.81(8.1)
- Labour union**, *see* Union
- Labrador**
 - deduction for individuals residing in, Reg. 7303.1(1)(f)
- Land**
 - adjusted cost base, additions to, 53(1)(h), (i)
 - allocation of proceeds of disposition between land and buildings, 13(21.1), 70(5)(d)
 - clearing, levelling, draining, 30
 - costs relating to ownership of
 - • limitation on deductibility, 18(3.1)–(3.7)
 - defined
 - • for restrictions on deductible expenses, 18(3)
 - • generally, 70(5.2) (Notes)
 - donation of, *see* Ecological gifts
 - drainage system, deduction, 30
 - ecological, *see* Ecological gifts
 - interest on debt relating to acquisition of
 - • defined, 18(3)
 - • limitation on deductibility, 18(2)
 - inventory
 - • cost to include non-deductible expenses, 10(1.1)
 - • deceased taxpayer’s, 70(5.2)
 - meaning of, *see* “defined” (above)
 - not depreciable, Reg. 1102(2)
 - rent paid before acquisition, deemed depreciable property, 13(5.2)(c)
 - tillage of soil, 248(1)“farming”
 - unproductive
 - • limitation on deductibility of expenses, 18(2)
 - used in farming business, *see also* Farm land
 - • disposition of
 - • • loss, added to cost base, 111(6)
 - • transferred to child on death, 70(9)
 - used in farming business of partnership
 - • disposition of, 101
- Land drainage system, deduction**, 30
- Land registry**
 - lien on property for various debts owing, 223(5)–(11)
- Landfill gas**
 - defined, Reg. 1104(13)
 - included in eligible waste fuel, Reg. 1104(13)“eligible waste fuel”
- Landscaping grounds**
 - deductible expense, 20(1)(aa)
- Lapse-supported policy**
 - defined, Reg. 1408(1)
- Large corporation**
 - appeal by, only on grounds raised in objection, 169(2.1)
 - capital tax on, *see* Large corporations tax (Part I.3)
 - defined, 225.1(8)
 - notice of objection, requirements, 165(1.11)–(1.14)
 - R&D investment tax credits limited, 127(10.2)
 - required to remit ½ of taxes in dispute, 164(1.1)(d)(ii), 225.1(7)
 - required to remit source withholdings through financial institution, 153(1), Reg. 110
 - • exception, 153(1.4)
 - small business deduction limited, 125(5.1)(a)
- Large corporations tax (Part I.3)**, 181–181.71 (before 2006)
- Large employer**
 - required to remit source withholdings through financial institution, 153(1), Reg. 110
 - • exception, 153(1.4)
- Large print-on-screen device, for use by blind person**
 - disability supports deduction, 64(a)A(ii)(C)
 - medical expense credit, Reg. 5700(o)
- Laryngeal speaking aid, as medical expense**, 118.2(2)(i)
- Laser-disk**, *see* Digital video disk (DVD)
- Last, capital cost allowance**, Reg. Sch. II:Cl. 12(d)
- Late-filed elections or documents**
 - detail on notice of objection, 165(1.12)
 - generally, 220(3.2), Reg. 600
 - resource taxation, 66(12.74)–(12.75)
 - s. 85 rollover, 85(7)–(8)
 - to trigger capital gain before corporation goes public, 48.1(3)
- Late-filed return**
 - penalty, 162(1), 235
- Lather (interior systems mechanic)**
 - apprenticeship job creation credit, 127(9)“investment tax credit”
- Lavrinenko case overruled**, 122.6“shared-custody parent”(b)
- Law Society**
 - bar admission examination fees, tuition credit, 118.5(1)(d)
 - membership fees, deductible to employee, 8(1)(i)(i)
- Lawyer**
 - appointed a judge, deferral of income, 24.1 [repealed]
 - books and records required to be kept, 230(2.1)
 - defined, 232(1), 248(1)
 - examination fees to qualify as, tuition credit, 118.5(1)(d)
 - incorporated, *see* Professional corporation
 - income of, *see* Professional practice
 - misrepresentation by, penalty, 163.2
 - partnership, *see* Professional partnership
 - solicitor-client privilege, 232
 - trust account of, excepted from rule that trust paying no tax must file T3, 150(1.2)(c), 150(1.4)
- Lead performer (for Canadian film/video tax credit)**
 - defined, Reg. 1106(8)(a)
- Lead voice (for Canadian film/video tax credit)**
 - defined, Reg. 1106(8)(b)

Leads (given to CRA), *see* Informant payments

Leaf tobacco

- processing, exempt from tobacco manufacturers' surtax, 182(2)"exempt activity"(b)

Learning disability

- tutoring for
- • disability supports deduction, 64(a)A(ii)(H)
- • medical expense credit, 118.2(2)(1.91)

Lease

- financing, *see* Direct financing lease
- option to purchase, *see* Option

Lease cancellation payment, 13(5.5), 20(1)(z), (z.1)

- amalgamation, on, 87(2)(j.5)
- limitation on deductibility, 18(1)(q)

Lease financing amount

- defined, for interest deduction restrictions, 18.2(1)
- subject to deduction restrictions, 18.2(1)"interest and financing expenses"A(f)

Lease inducement payments

- taxable as income, 12(1)(x)

Lease-leaseback arrangement

- rental payments included in cost for CCA, 13(5.4)

Lease obligation

- defined, for FAPI rules, 95(1)
- income of foreign affiliate from, 95(2)(a.3)

Leasehold interest, *see also* Interest (in property, etc.)

- capital cost allowance, Reg. 1100(1)(b), 1102(4)–(6), Reg. Sch. II:Cl. 13, Reg. Sch. III
- deemed disposition of, 13(5.1)
- property acquired, rules, 13(5.1)
- separate classes, Reg. 1101(5h)

Leasing costs

- non-resident withholding tax, 212(1)(d)
- passenger vehicle
- • limitation on deductibility, 67.3
- • • where more than one lessor, 67.4

Leasing properties

- amalgamations, 16.1(4)
- assignments, 16.1(2), (3)
- capital cost allowance, Reg. 1100(15)–(20), 1101(5c)
- defined, Reg. 1100(17)–(20)
- • non-arm's length exception, Reg. 1102(20)
- minimum tax, 127.52(1)(b), (c.2)(ii), 127.52(3)"rental or leasing property"
- replacement property, 16.1(5)–(7)
- rules re, 16.1
- rules where election filed, 16.1(1)–(4)
- subleases, 16.1(2), (3)
- windings-up, 16.1(4)

Leave of absence, *see* Sabbatical arrangement

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

Lebanon, *see also* Foreign government

- universities, gifts to, Reg. Sch. VIII, s. 9

Legal costs, *see also* Court: costs

- collecting or establishing right to pension benefit
- • deduction for, 60(o.1)
- • reimbursement of, taxable, 56(1)(l.1)
- collecting or establishing right to retiring allowance or severance pay
- • deduction for, 60(o.1)
- • reimbursement of, taxable, 56(1)(l.1)
- collecting or establishing right to wages
- • deduction for, 8(1)(b)
- • reimbursement of, taxable, 6(1)(j)
- conducting appeal, of, 60(o)
- deductible, 8(1)(b), 20(1)(e), 20(1)(cc), 60(o), (o.1), 62(3)(f), 118.2(2)(1.1)(i)

- financing, 20(1)(e)
- income when awarded or reimbursed, 6(1)(j), 56(1)(l), (l.1)
- lobbying, 20(1)(cc)
- moving expenses, 62(3)(f)
- objecting to assessment, 60(o)
- objecting to determination, 152(1.2)
- purchase of new home, 62(3)(f)
- relating to organ or bone marrow transplant, 118.2(2)(1.1)(i)
- representation expenses, 20(1)(cc)
- seizure of chattels, 225(2), (4)

Legal documents

- cost of revising for change of address, deduction, 62(3)(f)

Legal representative

- appropriation of property by, 159(3.1)
- clearance certificate, 159(2)
- defined, 248(1)
- liability for taxpayer's obligations, 159(1), (3)
- obligations of, 159(1)

Legal representative of deceased taxpayer

- application to Minister re vesting of properties, 70(5.2), (6), (9), (9.2)
- election re amounts receivable, 70(2)
- • revocation of, 70(4)
- election re losses, 164(6)
- • reassessment, 152(6)
- election re payment of tax in instalments, 159(5)–(7)
- election re reserves, 72(2)
- information return, Reg. 206
- return of income, when due, 70(7)

Legislation

- amendment of, *see* Amendment
- citation of, *Interpretation Act* s. 40
- deemed remedial, *Interpretation Act* s. 12
- definitions, effect of, *Interpretation Act* s. 15
- headings or titles, *Interpretation Act* s. 14
- in-force date, *see* Amendments: when in force
- interpretation of, *Interpretation Act*
- marginal notes, *Interpretation Act* s. 14
- repeal of, *Interpretation Act* s. 43–45
- titles of sections, *see* Marginal notes

Legislative assembly (or Legislature)

- defined, *Interpretation Act* s. 35(1)
- member of, expense allowance exempt, 81(2) [before 2019]

Lehigh Cement case overruled, 212(1)(b)(i)(B), 245(0.1)(c)

Lending asset, *see also* Specified debt obligation

- cost amount of, 248(1)"cost amount"(d.1)
- defined, 248(1)
- • for FAPI purposes, 95(1)"lending of money" closing words

Lending of money, *see also* Loan

- defined, for FAPI rules, 95(1)

Lesbian couples, *see* Common-law partner

Level-yield method (for allocation return from specified debt obligation)

- defined, Reg. 9102(2)

Leveraged insured annuity, *see* LIA policy

Leveraged leasing, CCA restrictions, Reg. 1100(15)–(20)

Lewin case overruled, 214(3)(f)(i)(C)

Liabilities

- determination of, for debt forgiveness reserve, 61.3(1)(b)C(ii)

Liability for incurred claims

- defined, 138(12), Reg. 1408(1), Reg. 2400(1)

Liability for remaining coverage

- defined, 138(12), Reg. 1408(1), Reg. 2400(1)

Liability for tax

- alternative minimum tax, 127.5
- failure to withhold tax on payment to non-resident, 215(6)

Index

Liability for tax (*cont'd*)

- general, 2
- income from property transferred at non-arm's length, on, 160(1)–(3)
- income-splitting tax, 120.4(2)
- income trusts distributions tax, 122(1)(b)
- joint and several
 - assessment of, 160.1(3)
 - charitable organization and charitable foundation, 188(4)
 - charity making gift to second charity to delay expenditures, 188.1(11)
 - charity revocation tax, 188(2)
 - debt forgiveness reserve, asset transfer, 160.4
 - debtor and transferee following transfer of forgiven amount, 80.04(11)
 - directors and corporation, source withholdings and other amount, 227.1
 - excessive election re capital dividend or capital gains dividend, 185(4), (6)
 - excessive eligible dividend designation, 185.2(3), (5)
 - GST credit overpayment, 160.1(1.1)
 - income-splitting tax, 160(1.2)
 - intergenerational business transfers, 160(1.5)
 - legal representative and taxpayer, 159(1)
 - non-resident trust, Canadian beneficiary and contributor, 94(3)(d)(i)
 - Part III tax, 185(4), (6)
 - Part III.1 tax, 185.2(3), (5)
 - payor and non-resident, withholding tax, 227(8.1)
 - person responsible for withholding taxes, 227(5)
 - property transferred not at arm's length, 160(1)
 - property transferred to use other taxpayer's benefit, 160(1.1)
 - RCA benefits received by another, 160.3
 - RRIF, amounts received under, 160.2(2)
 - RRSP, amounts received under, 160.2(1)
 - reportable avoidance transactions penalty, 237.3(9), (10)
 - secured creditor, for remittances, 227(5.2)–(5.4) (1995 draft, abandoned)
 - transferred Part VI.1 tax, 191.3(1)(e)
 - trustee and person whose property is being managed, withholding, 227(5), (5.1)
 - trustee in bankruptcy and bankrupt corporation, 128(1)(e)
 - UI premium tax credit, 160.1(2.2)
- minimum tax, 127.5
- non-resident corporation
 - carrying on business in Canada, 219
 - not affected by incorrect assessment, 152(3)
- Part I, 2
 - Part I.2, 180.2(2)
 - Part II, 182(1)
 - Part II.1, 183.1(2)
 - Part II.2, 183.3(2)
 - Part III, 184
 - Part III.1, 185.2
 - Part IV, 186(1)
 - Part IV.1, 187.2, 187.3(1)
 - Part V, 188
 - Part VI, 190.1(1), (1.1), (1.2)
 - Part VI.1, 191.1(1)
 - Part VI.2 (for 2022), 191.5(2)
 - Part IX, 196(1)
 - Part IX.1, 197(2)
 - Part X, 198(1), (3), 199(1), 201
 - Part X.1, 204.1
 - Part X.2, 204.6
 - Part X.3, 204.82(1)–(3), (5), (6), 204.841
 - Part X.4 tax, 204.91
 - Part X.5 tax, 204.94(2)

- Part XI.01, 207.02, 207.021, 207.03, 207.04(1), (6), 207.05(1), (3)
- Part XI.1, 207.1
- Part XI.2, 207.3
- Part XI.3, 207.7(1)
- Part XI.4, 207.8(2)
- Part XI.5, 207.9(2)
- Part XII.1, 209(2)
- Part XII.2, 210.2(1), (2)
- Part XII.3, 211.1(1)
- Part XII.4, 211.6(2)
- Part XII.5, 211.8(1), 211.81
- Part XII.6, 211.91(1)
- Part XIII, 212
 - Part XIII.1, 218.2(1)
 - Part XIII.2, 218.3(2)
- Part XIV, 219
- partnerships distributions tax, 197(2)
- transfer of property to spouse or minor, 160(1)
- trustee, etc., 159

Library books

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

License

- capital cost allowance, Reg. 1100(1)(c), Reg. Sch. II:Cl. 14
- representation expense, 13(12), 20(1)(cc), 20(9)

Licensed annuities provider

- defined, 147(1), 248(1)
- RESP-eligible investments, 146.1(1)“qualified investment”(c)
- RRIF-eligible investments, 146.3(1)“qualified investment”(b.1), (b.2)
- RRSP-eligible investments, 146(1)“qualified investment”(c)–(c.2)

Licensing of property

- defined, for FAPI rules, 95(1)

Lieutenant governor

- defined, *Interpretation Act* 35(1)
- pension plan, Reg. 8309
- RRSP contribution room, Reg. 8309(1)

Life annuity

- for disabled person, rollover to RRSP, 60.011(2)(b)

Life estate in real property

- defined, 43.1(1)
- effect of retaining, 43.1(1)
- termination of, 43.1(2), 53(1)(o)

Life income fund, *see* Registered retirement income fund

Life insurance, *see also* Life insurance corporation; Life insurance policy

- business, defined, 248(1)
- definitions, 148(9)
- group plan, whether premiums an employment benefit, 6(1)(a)(i), 6(4)
- net cost of pure insurance, Reg. 308
- policy, *see* Life insurance policy
- policy loan, *see* Policy loan (life insurance)
- policyholder
 - “adjusted cost basis” of policy, 148(9)“adjusted cost basis”
 - “child” of, 148(9)
 - deemed dispositions, 148(2)
 - disposition of interest at non-arm's length, 148(7), (8)
 - disposition of part of interest, 148(4)
 - income from disposition of interest in policy, 148(1), (4)
 - premiums, *see* Premium
 - proceeds received as annuity, 148(6)
 - “relevant authority” defined, 148(9)
 - rules re certain policies, 148(3)

Index

- Life insurance capital dividend**, *see also* Capital dividend account
- brought into capital dividend account, 89(1)“capital dividend account”(e)
 - defined, 248(1)
- Life insurance corporation**, *see also* Insurance corporation
- accounting rule changes, transitional rules, 138(16)–(25)
 - accumulated 1968 deficit, defined, 138(12)
 - additional taxes on, 123.6 [annual], 191.5 [2022 only]
 - building under construction etc., amount included in income re, 138(4.4)–(4.6), Reg. 2410
 - capital gain on pre-1969 property, 138(11.2)
 - capital tax, 190.1(1)
 - change in use rules, 138(11.3), (11.4), (11.41), (11.6); ITAR 26(17.1)
 - computation of income, 138(1)–(6)
 - deductions, 138(3), Reg. 1401
 - Part XII.3 tax, 138(3)(g)
 - deemed a public corporation, 141(2)
 - defined, 248(1)
 - definitions, 138(12)
 - demutualization, 139.1
 - dividends from taxable corporations, 138(6)
 - foreign taxes not deductible, 138(5.1), (8)
 - identical properties of, 138(11.1)
 - information returns, Reg. 217
 - maximum tax actuarial reserve, 138(12)
 - non-resident, 219(4)–(8), Reg. 2401
 - branch tax elections, Reg. 2403
 - provincial, conversion to mutual corporation, 139
 - real property, vacant or under development, amount included in income re, 138(4.4)–(4.6) Reg. 2410
 - “relevant authority” defined, 138(12)
 - reserves, 138(3)(a), Reg. 1400–1408
 - unpaid claims, 138(3)(a)(ii) [repealed]
 - rules applicable to, 138
 - segregated funds of, 138.1, Reg. 6100
 - surtaxes on, 123.6 [annual], 191.5 [2022 only]
 - tax on investment income, 211–211.5
 - Canadian life investment income, 211.1(3)
 - interest on overdue tax, 211.5
 - payment of tax, 211.4, 211.5
 - rate of tax, 211.1(1)
 - return, 211.2
 - taxable Canadian life investment income, 211.1(2)
 - taxable income of, 138(7)
 - transitional rules for accounting rule changes, 138(16)–(25)
- Life insurance policy**, *see also* Annuity contract
- accrued income, 12.2
 - amounts included in income on anniversary, 12.2(1)
 - anniversary day, defined, 12.2(11)
 - deduction for over-accrual, 20(20)
 - acquisition costs of
 - not deductible to insurer, 18(9.02)
 - “adjusted cost basis” of, to policyholder, 148(9)
 - anniversary day, defined, 12.2(11)
 - annuity, proceeds received as, 148(6)
 - charity designated as beneficiary, 118.1(5.2)(a)
 - corporation beneficiary under, where, 89(2)
 - deemed disposition of, 148(2)
 - defined, 12.2(10), 138(4.01), 138(12), 211(1), 248(1), Reg. 1408(1)
 - in Canada, 138(12), 211(1), 248(1), Reg. 1408(1)
 - registered, 211(1)
 - disposition by non-resident
 - certificate, 116(5.2)
 - presumption, 116(5.4)
 - purchaser liable for tax, 116(5.3)
 - rules, 116(5.1)
 - disposition of
 - amount included in income, 148(1.1)
 - deduction, 20(20)
 - defined, 148(9)“disposition”, 248(1)“disposition”(b.1)
 - no capital gain, 39(1)(a)(iii)
 - no capital loss, 39(1)(b)(ii)
 - non-arm’s length, 148(7), (8)
 - policyholder’s income, 148(1), (4)
 - proceeds of
 - defined, 148(9)“proceeds of the disposition”
 - income, 56(1)(j)
 - distribution of proceeds
 - by corporation, 89(1)“capital dividend account”(d)(iii)
 - by partnership, 53(1)(e)(iii)
 - dividends, 148(2)
 - enhanced capital gains deduction, effect on, 110.6(15)
 - exempt policy, Reg. 306
 - defined, 12.2(11)
 - group term, defined, 248(1)
 - in Canada, defined, 138(12), 211(1), 248(1), Reg. 310, 1408(1)
 - income from, 148
 - interest in
 - amount to be included, 12.2(1)
 - owned under deferred profit sharing plan, 198(6)–(8)
 - “value” defined, 148(9)“value”
 - life annuity contract, 148(10)
 - loan, *see* Policy loan (life insurance)
 - mortality gains and losses, Reg. 308
 - net cost of pure insurance, Reg. 308
 - participating, *see* Participating life insurance policy
 - premium, *see* Premium
 - “prescribed increase” in benefit on death under, Reg. 309(2)
 - prescribed premium, rules, Reg. 309
 - proceeds of the disposition of, defined, 148(9)
 - retirement compensation arrangement funded by, 207.6(2)
 - riders, 12.2(10)
 - rollover
 - to child, 148(8)
 - to spouse, 148(8.1), (8.2)
 - segregated fund, 138.1, Reg. 6100
 - defined, 138(12)
 - “tax anniversary date” defined, 148(9)
 - third anniversary amounts, defined, 12.2(11)“anniversary day”
 - transfer not at arm’s length, 89(1)“capital dividend account”(d)(v), 148(7)
 - transfer to child, 148(8)
 - transfer to spouse
 - breakdown of marriage, on, 148(8.1)
 - death, on, 148(8.2)
 - value of, for valuing shares etc. on death, emigration or immigration, 70(5.3)
- Life insurance policy in Canada**, *see* Life insurance policy: in Canada
- Life insurer**, *see also* Life insurance corporation
- defined, 248(1)
- Life interest**, *see* Life estate in real property
- Life interest trust**, *see* Alter ego trust
- Lifelong Learning Plan**, 146.02
- definitions, 146.01(1)
 - income inclusions, 56(1)(h.2), 146.02(4)–(6)
 - repayment of amount borrowed from RRSP, 146.02(3)
 - withdrawal of funds from RRSP, 146(8), Reg. 104.1
 - within 90 days of contribution, deduction disallowed, 146(5)(a)(iv.1), 146(5.1)(a)(iv)
 - withholding exemption, Reg. 104.1
- Lifetime benefit trust**
- defined, 60.011(1)

Index

- Lifetime disability assistance payments**
 - defined, 146.4(1)
- Lifetime retirement benefits**
 - defined, Reg. 8500(1)
- Lift, power-operated (for wheelchair etc.)**
 - medical expense, Reg. 5700(m)
- Lift truck, industrial**
 - capital cost allowance, Reg. Sch. II:Cl. 29
- Limitation of benefits rule, Canada-U.S. Tax Treaty:Art. XXIX-A**
- Limitation periods, see also Filing deadlines; Reassessment; Statute-barred debt, deemed settled; Table O-6 at beginning of book**
 - collection of tax debt, 10 years, 222(4)
 - prosecution for offences, 244(4)
 - requesting adjustment to past return, 10 years, 152(4.2)
 - requesting past Canada Child Benefit, 10 years, 122.62(2)
 - requesting refund of past year, 10 years, 164(1.5)
 - requesting waiver of interest or penalty, 10 years, 220(3.1)
- Limited-dividend housing company**
 - defined, Reg. 3700
 - exemption, 149(1)(n)
- Limited liability company (U.S.)**
 - equity interests treated as shares, 93.2(2)
 - look-through for treaty purposes, Canada-U.S. Tax Treaty:Art. IV:6
 - treated as corporation, 248(1)“corporation”
 - treated as foreign affiliate, Reg. 5907(11.2)(b)
- Limited liability partnership**
 - at-risk rules inapplicable, 96(2.4)(a)
 - capital gain not triggered by negative ACB, 40(3.14)(a)
 - United Kingdom, Canada-UK treaty Interpretative Protocol (2014)
- Limited partner, see also Limited partnership; Specified member (of partnership)**
 - at-risk rules, 96(2.1)–(2.7)
 - deemed capital gain on negative adjusted cost base, 40(3.1)(a)
 - deemed not to carry on partnership’s business, 253.1
 - defined, 96(2.4)
 - for investment tax credit, 127(8.5)
 - for minimum tax purposes, 127.52(3)
 - for partnership interest negative ACB, 40(3.14)
 - for tax shelter investments, 143.2(1)
 - investment tax credit, 127(8.1)
 - CCUS (carbon capture) credit, 127.44(10)
 - limit on cost of investment, 143.2(1)“tax shelter investment”(b), 143.2(6)
 - minimum tax, 127.52(1)(c.1)
 - research and development losses, 96(1)(g)
 - resource expenses, 66.8
- Limited partnership, see also Limited partner; Partnership; Tax shelter: investment**
 - debt of, qualified investment for RRSP etc., Reg. 4900(1)(n.01)
 - deemed not a business of the partner, 253.1
 - losses, *see* Limited partnership losses
 - mutual fund commissions financing, 18.1
 - service of documents on, 244(20)(b)(ii)(A)
 - unit
 - qualified investment for RRSP etc., Reg. 4900(1)(n)
 - small business investment, Reg. 5102
- Limited partnership losses, see also Limited partnership**
 - adjusted cost base of partnership interest, reduction for, 53(2)(c)(i.1)
 - amalgamation, on, 87(2.1)(a), (b)
 - at-risk amount, 96(2.1)
 - artificial transactions to increase, 96(2.6), (2.7)
 - defined, 96(2.2)
 - carryforward of, 111(1)(e)
 - deductibility, 96(2.1)
 - limitation on, 111(3)(a)
 - defined, 96(2.1), 248(1)
 - determination of, by Minister, 152(1.1), (1.2), (1.3)
 - minimum tax, 127.52(1)(c.1)
 - order of deduction, 111(3)(b)
 - partnership interest acquired by subsequent person, 96(2.3)
 - winding-up, on, 88(1.1)
- Limited partnership unit, see Limited partnership: unit**
- Limited-recourse amount**
 - defined, for tax shelter investments, 143.2(1), (7)
- Limited-recourse debt**
 - application to definition of tax shelter, 237.1(1)“gifting arrangement”(b)
 - application to determination of advantage received, 248(32)(b)
 - defined, 143.2(6.1)
 - repayment of, 248(34)
- Linefill**
 - in pipeline, no CCA, Reg. 1102(1)(k)
- Linen**
 - capital cost allowance, Reg. Sch. II:Cl. 12(g)
- Linked note**
 - sale of
 - deemed interest inclusion, 20(14.2)
 - information return, Reg. 201(1)(g)
- Liquefaction of natural gas, see also Eligible liquefaction facility**
 - income from, determination of, Reg. 1104(18)
- Liquefied natural gas**
 - facility for, *see* Eligible liquefaction facility
- Liquid biofuel**
 - defined, Reg. 1104(13)
- Liquidation entitlement**
 - defined
 - capital gains deduction, Reg. 6205(1)(a)(i)(B), 6205(4)(b)
 - flow-through shares, Reg. 6202.1(1)(a)(ii), 6202.1(1.1)(a), 6202.1(3)(b)
 - taxable preferred shares, 248(1)“taxable preferred share”(b)(ii)
 - taxable RFI shares, 248(1)“taxable RFI share”(b)
- Liquidator, see also Legal representative**
 - certificate before distribution, 159(2)
 - deemed to be legal representative, 248(1)“legal representative”
 - obligations of, 159
 - return required by, 150(3)
 - withholding tax, liability for, 227(5), (5.1)
- List of amounts, see Dollar amounts in legislation and regulations**
- List of taxes and tax rates, see Rates of tax**
- Listed country**
 - for foreign affiliate purposes, Reg. 5907(11)–(11.2)
- Listed election**
 - defined, Reg. 5911(2)
- Listed financial institution**
 - defined
 - for Canadian reporting of US persons’ interests in accounts, 263(1)
- Listed international agreement**
 - disclosure of information as permitted by, 241(4)(e)(xii)
- Listed personal property, see also Art; Personal-use property**
 - defined, 54
 - loss from
 - defined, 41(3)
 - reassessment, 152(6)(b)
 - usable only against LPP gains, 3(b)(ii), 41(2)

Index

- Listed personal property (*cont'd*)
- net gain from disposition, 41(2)
- Listed securities**, *see* Publicly-traded securities
- Listed terrorist entity**
- ceasing to be, 149.1(1.02)
 - defined, 149.1(1)
 - individual ineligible to be director of charity, 149.1(1)“ineligible individual”(e)–(h)
 - revocation of charity, 168(3.1)
 - • deemed year-end on notice of revocation, 188(1)
- Literary work, copyright royalties**
- no withholding tax, 212(1)(b)(vi), 212(9)(b)
- Lithium**, *see* Critical mineral
- Litigation, costs of**, *see* Court: costs
- Little Egypt bump**
- prevention of, 98(5)(d) [repealed]
- Liver extract, as medical expense**, 118.2(2)(k)
- Livestock**
- destruction of
 - • deferral of income from, 80.3(2)
 - • • exceptions, 80.3(6)
 - • inclusion of deferred amount, 80.3(3)
 - • • amalgamation, on, 87(2)(tt)
 - exhibiting and raising, 248(1)“farming”
 - sales of, in prescribed drought or flood region, *see* Drought or flood region: prescribed
- Living together, deemed spouses**, *see* Common-law partner
- Loan**, *see also* Borrowed money; Debt; Interest (money)
- acquired in ordinary course of business of insurer or moneylender, 20(27)
 - back-to-back, to spouse or minor, 74.5(6)
 - charity, by, 118.1(16)
 - corporation to, to reduce income, 74.4(2)
 - • outstanding amount, 74.4(3)
 - cost amount of, 248(1)“cost amount”(d.1)
 - employee, to, included in income, 6(9), 80.4(1)
 - foreign affiliate’s income from, 95(2)(a.3)
 - forgiveness of, *see* Debt forgiveness
 - guarantee fee, deductible, 20(1)(e)
 - home purchase, *see* Home purchase loan
 - interest-free or low-interest
 - • to child, 74.1(2)
 - • to employee, 80.4(1)
 - • to non-arm’s length person, 56(4.1)
 - • to non-resident, 17
 - • to shareholder, 15(2)–(2.6)
 - • to spouse, 74.1(1)
 - inventory write-down restricted, 18(1)(s)
 - minor, to, 74.1(2), 74.5(6)–(11)
 - • for value, 74.5, (2)
 - • repayment of, 74.1(3)
 - non-arm’s length person, to, 56(4.1)–(4.3)
 - • used to repay existing indebtedness, 56(4.3)
 - non-resident, to, by corporation, 17
 - partnership interest, of, 96(1.8)
 - personal services business, to
 - • inclusion in income, 12(1)(w)
 - policy, repayment of, 60(s)
 - reduction in value of
 - • limitation on deduction re, 18(1)(s)
 - related person, to, *see* non-arm’s length person (*above*)
 - shareholder, to, by corporation, 15(2)–(2.6), 80.4(2)
 - • back-to-back rules, 15(2.16)–(2.192)
 - • capacity test, 15(2.4)(e)
 - • deemed benefit, 15(9)
 - • exception for “pertinent loan or indebtedness”, 15(2.11), 17.1
 - • forgiveness of, 15(1.2)
 - • from foreign affiliate, 90(6)–(15)
 - • non-residents, 15(2.2), (8), 227(6.1)
 - • persons connected with, 80.4(8)
 - • repayment of, 20(1)(j)
 - spouse, to, 74.1(1)
 - • for value, 74.5(2)
 - • repayment of, 74.1(3)
 - value, for, to non-arm’s length person, 56(4.2)
 - wholly-owned subsidiary, to, 17, 218
- Loanbacks**
- property or money donated to charity, 118.1(16)
- Lobbying**, *see* Representation expenses
- Local**
- of union, deemed same employer as union, 252.1
- Local Lockdown Program (COVID-19)**
- wage and rent subsidies, 125.7(1)“base percentage”(l)(i)(B)(II), (m)(i)(B)(II)
- Lockdown support (COVID-19)**, 125.7(2.1)B
- Locked-in annuity**
- held by RRIF, 146.3(1)“qualified investment”(b.2)
- Locked-in retirement account**, 147.3(1) (Notes)
- Locomotive**, *see* Railway: locomotive
- Lodge, expense of, not deductible**, 18(1)(l)
- Lodging**, *see* Board and lodging
- Logging equipment**, Reg. Sch. II:Cl. 10(o)
- Logging operations**
- income from, in the province, defined, 127(2)“income for the year from logging operations in the province”
- Logging property**
- investment tax credit, 127(9)“qualified property”(c)(iii)
- Logging tax**
- deduction from income tax, 127(1), Reg. Part VII
 - defined, 127(2)
 - provincial legislation imposing, Reg. 700(3)
 - rules applicable to, 127(1)
- Long-haul truck**
- defined, for meals percentages, 67.1(5)
- Long-haul truck driver**
- defined, 67.1(5)
 - food and beverages, percentage allowed, 67.1(1.1)
- “Long-term debt” defined**, 181(1), 190(1)
- Long-term resident**
- defined, Canada-U.S. Tax Treaty:Fifth Protocol (2007), Annex B, para. 11
- Look-back rule (for flow-through shares)**
- interest charged as tax, 211.91(1)
 - renunciation permitted, 66(12.66)(a.1)
- Look-through rule (for partnerships)**, *see* Tiers of partnerships
- Loss(es)**
- amalgamation, on, 87(2.1)
 - capital, *see* Capital loss
 - carryback, *see* Carryback
 - carryforward, *see* Carryforward
 - carryover of, 111
 - • corporation or trust, by, 111(5)–(5.5)
 - • • anti-avoidance provision, 111(5.5)(b)
 - • • change in control of corporation, 111(4)
 - • farming business, from, 111(1)(c), (d), 111(6), (7)
 - • restricted, for corporation becoming or ceasing to be exempt, 149(10)(c)
 - defined, for disposition of specified debt obligation, Reg. 9200
 - determination of, by Minister, 152(1.1), (1.2), (1.3)
 - disposition of debt in exchange for replacement obligation, 40(2)(e.2)

Index

Loss(es) (*cont'd*)

- disposition of debt owing by related person, deemed nil, 40(2)(e.1)
- disposition of share of, foreign affiliate, on, 93(2)–(4)
- farm, defined, 111(8)
- farming, *see also* Farm loss
 - after land disposed of, 111(6)
 - carryover of, 111(1)(d)
 - deduction limited, 31
 - effect on cost base of land, 53(1)(i)
 - limitation on deductibility, 111(3), (6), (7)
 - partnership, of, 101, 111(7)
 - reduction on debt forgiveness, 80(3)(b), (c)
 - restricted farm loss, *see* Restricted farm loss
- fishing, 111(8)“farm loss”A(a)(i), *see also* Farm loss
- foreign affiliate, of
 - deductible, Reg. 5903
 - defined, Reg. 5907(1)
- foreign bank’s Canadian affiliate, 142.7(12)
- housing, *see* Housing loss
- insurer’s, 138(2)
- limitations on deductibility, 111(3), *see also* Stop-loss rules
- net capital, *see* Net capital loss
- non-capital, *see* Non-capital loss
- office or employment, from, 5(2)
- order of reduction, on settlement of debt, 80(2)
- place, from sources in, 4
- post-emigration, 128.1(8)
- reduction of, on property previously owned by trust, 107(6)
- restrictions on deductibility, *see* Loss restriction event; Stop-loss rules
- share that is capital property, on, 112(3), (4)
- source, from, 4
- stop-loss rules, *see* Stop-loss rules
- superficial
 - business of lending money, 18(13), (15)
 - capital property, 40(2)(g)(i), 54
 - defined, 54
 - inventory held as adventure in nature of trade, 18(14)–(16)
- terminal
 - deduction for, 20(16)
 - no deduction re motor vehicle, 20(16.1)
- transfer of, *see* Suspension of losses; Transfer of losses
- windup, on, 88(1.1)

Loss of income source, deduction for interest expense, 20.1

Loss offset program, *see* Fuel tax rebate (1992–1999)

Loss restriction event, *see also* Control of corporation: change of

- deemed acquisition of control of corporation, 256(7), (8)
- deemed year-end, 249(4)
- defined, 251.2
- loss carryovers restricted
 - bad debts, 111(5.3), (5.5)
 - business losses, 111(5)
 - capital losses, 40(3.4)(b)(iii), 53(2)(b.2), 111(4), (5.5), 111(8)“net capital loss”C(c), 111(12)
- cumulative unused excess capacity (for interest deduction restrictions), 111(5.01)
- debt forgiveness, 80(1)“relevant loss balance”(b), 80(1)“unrecognized loss”, 80(15)(c)(iv), 80.04(4)(h)
- depreciable property, 13(21.2)(e)(iii)(D), 13(24), (25), 111(5.1), (5.5)
- doubtful debts, 111(5.3)
- farm losses, 111(5), (5.5)
- foreign currency debt, 111(12)
- interest deduction restrictions, 111(5), (5.01)
- inventory, 10(10), (11)
- investment tax credit, 127(9)“investment tax credit”(j), (k), 127(9.1), (9.2)

- matchable expenditure rules, 18.1(1)(b)(ii)
- net capital losses, *see* capital losses (above)
- non-capital losses (business losses), 111(5)
- resource expenditures, 66(11.4)–(11.6)
- SR&ED expenditures, 37(1)(h), 37(6.1)
- superficial loss, 54“superficial loss”(f)
- undepreciated capital cost, 111(5.1)

Lottery

- capital gain or loss nil, 40(2)(f)
- cost of prize won is its fair market value, 52(4)
- prize winnings, not taxed (no taxing provision)

Low rate income pool

- after amalgamation, 87(2)(ww), 89(9)
- after windup, 87(2)(ww), 88(1)(e.2)(ix), 89(10)
- defined, 89(1), 248(1)
 - addition on amalgamation, 87(2)(ww), 89(9)
 - addition on ceasing to be CCPC, 89(8)
 - addition on windup, 87(2)(ww), 88(1)(e.2)(ix), 89(10)
- dividend paid from, 89(1)“eligible dividend”, “excessive eligible dividend designation”

Lower value account

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

Lump-sum payment

- employment income
 - defined, Reg. 103(6)
 - withholding of tax, Reg. 103(4)
- retroactive spreading over past years
 - addition to tax for earlier years, 120.31
 - deduction in current year, 110.2

Lump-sum premium

- defined, Reg. 2700(1)

Luxembourg, *see also* Foreign government

- stock exchange recognized, 262

Luxury Items Tax, 18(1)(t) (Notes)

- interest paid under, not deductible, 18(1)(t)(iv)

Luxury vehicle, *see* Luxury Items Tax; Passenger vehicle: luxury

M

M&P, *see* Manufacturing or processing: credit

METC, *see* Medical expenses [tax credit]; Mineral Exploration Tax Credit

MFPP, *see* Member-funded pension plan

MHRTC, *see* Multigenerational Home Renovation Tax Credit

MIB, *see* Majority-interest beneficiary

MIC, *see* Mortgage investment corporation

MIGB, *see* Majority-interest group of beneficiaries

MLI [Multilateral Instrument], *see before* Canada-US Tax Treaty

MNE group, *see* Multinational enterprise group

MP, *see* Member: Parliament

MPP, *see* Maximum participation period; Money purchase provision

MURB, *see* Multiple-unit residential buildings

Machine part, cutting or shaping

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

Machinery and equipment

- capital cost allowance for, Reg. Sch. II:Cl. 8, Sch. II:Cl. 29

Machinist

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

MacMillan Bloedel case overruled, 39(2) opening words

Magazine advertising

- limitation, 19.01

Magdalen Islands

- prescribed intermediate zone for northern residents’ deduction, Reg. 7303.1(2)

Magnesium, *see* Critical mineral

Mail

- notice of objection, 165(2)
- presumption re mailing date, 244(14)
- proof of service by, 244(5)
- receipt of things mailed, 248(7)

Maintenance, *see* Support payments (spousal or child)

Maintenance costs

- automobile, *see* Automobile: operating costs
- trust property, of, 105(2)

Majority-interest beneficiary

- defined, 251.1(3), 251.2(1)

Majority-interest group of beneficiaries

- defined, 251.1(3), 251.2(1)

Majority-interest group of partners

- defined, 251.1(3), 251.2(1)

Majority-interest partner

- acquisition of control of corporation that is, 13(24), 66(11.4)
- capital loss denied on disposition to partnership, 40(3.3), (3.4)
- defined, 248(1)

Malta, *see also* Foreign government

- film or video under treaty co-production, Reg. 1106(3)(e)

Management fee

- paid to non-resident, 212(1)(a)
- defined, 212(4)
- whether deductible, 67 (Notes)

Mandatory disclosure, 237.3, 237.4, 237.5, *see also* Notifiable transaction; Reportable transaction; Uncertain tax treatment

Manitoba, *see also* Province

- labour-sponsored venture capital corporation of
 - prescribed, Reg. 6700(a)(iii), (xii)
 - recovery of LSVCC credit, 211.7
- *Mineral Exploration Incentive Program Act*, assistance under, Reg. 6202.1(5)“excluded obligation”(a)(i)
- northern, *see* Northern Canada
- prescribed stock savings plan, Reg. 6705(e)
- Rural Development Bonds, eligible for RRSP investment, Reg. 4900(1)(i.1)
- tax rates, *see* introductory pages

Manrell case overruled, 56.4

Manufacturing or processing

- assets, capital cost allowance, Reg. Sch. II:Cl. 43
- building used for, additional CCA, Reg. 1100(1)(a.1)
- business
 - deemed capital cost of property acquired for, 13(10)
- credit, 125.1, Reg. Part LII
- defined
 - for Class 29 CCA, Reg. 1104(9)
 - for investment tax credit, 127(11)(a)
 - for M&P credit, 125.1(3)“manufacturing or processing”
 - for manufacturing and processing credit, 125.1(3)“manufacturing or processing”
- property used in, capital cost allowance, Reg. 1102(15), (16), (16.1), Reg. Sch. II:Cl. 29, Sch. II:Cl. 43
 - separate class for each property if election made, Reg. 1101(5s)
- tobacco, surtax on, 182, 183

Marginal notes

- effect of, *Interpretation Act* s. 14
- relevance to legislation, *Interpretation Act* s. 14

Marihuana, *see* Marijuana

Marijuana

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

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

Marine railway

- capital cost allowance, Reg. Sch. II:Cl. 7

Mark-to-market property, 142.5, *see also* Specified debt obligation

- amalgamation, effect of, 87(2)(e.4), (e.5)
- annual recognition of gain or loss, 142.5(2)
- cost amount of, 248(1)“cost amount”(c.1)
- debt obligation, interest on, 142.5(3)
- deemed disposition of, 142.5(2)
- defined, 142.2(1)
 - for stop-loss rules, 112(6)(c)
 - where election made re derivatives, 10.1(4)(a)
- disposition of
 - adjustment for dividends received, 112(5)–(5.2)
 - deemed
 - annual, 142.5(2)
 - on windup, 88(1)(i)
 - income treatment, 142.5(1)
 - no capital gain, 39(1)(a)(ii.2)
 - no capital loss, 39(1)(b)(ii)
- dividend deduction denied to financial institution, 112(2.01)
- mark-to-market treatment required, 142.5(2)
- rollover not permitted, 85(1.1)(g)(iii)
- stop-loss rules restricted, 112(5.6)
- superficial loss rule not applicable, 142.6(7)
- winding-up, effect of, 88(1)(a.3), (h), (i)

Mark-to-market treatment

- eligible derivative, by election, 10.1
- financial institution’s property, 142.5(2)

Markedly restricted

- defined, for disability credit, 118.3(1)

Marketing board

- patronage dividends where board used, 135(8)

Markevich case overruled, 222(3)–(10)

Marriage, *see also* Spouse; Common-law partner

- breakdown of, *see* Divorce and separation
- meaning of, *Civil Marriage Act* s. 2
- notice to CRA required for Canada Child Benefit purposes, 122.62(7)(a)
- same-sex, *see* Same-sex marriage

Married status

- tax credit, 118(1)B(a)
- limitation, 118(4)

MasterCard

- prescribed payment card corporation share, Reg. 9002.1(a)(i), (ii)

Master trust (or Pooled fund trust)

- defined, Reg. 4802(1.1)
- excluded from various trust rules, 108(1)“trust”(a)
- exemption from Part I tax, 149(1)(o.4)
- exemption from Part XII.2 tax, 210(2)(c)
- minimum tax not payable by, 127.55(f)(iii)
- rollover to new trust, 248(1)“disposition”(f)(vi)

Matchable expenditure

- deemed to be a tax shelter investment, 18.1(13)
- defined, 18.1(1)
- deduction restricted, 18.1(2)–(4)
- film shelters shut down, 18.1(17)
- non-arm’s length disposition, 18.1(8)–(10)
- reinsurance commissions excluded, 18.1(15)
- rules apply only to tax shelters, 18.1(16)

Matching rule, 18(9), *see also* Matchable expenditure

Material interest

- defined, 149.2(1)

Material transaction

- defined, for private foundations, 149.1(1), 149.2(2)

Maternity leave

- qualifying period for pension earnings, Reg. 8507(3)

Matrimonial regime, dissolution of, 248(22), (23)

Index

Maturity

- registered retirement savings plan, of, 146(1)“maturity”

Maximum benefit rule

- for registered pension plan, Reg. 8504

Maximum participation period

- defined, 146.6(1)
- no deduction after MPP ends, 146.6(1)“annual FHSA limit”(c)(i)
- no deduction before MPP starts, 146.6(1)“FHSA carryforward”(c)

“May”

- meaning of, *Interpretation Act* s. 11

McGillivray Restaurant case overruled, 256(5.11)

Meads v. Meads case, 2(1) (Notes)

Meals, *see also* Entertainment expenses (and meals)

- employee’s, deduction limited, 8(4)

Mean Canadian investment fund

- defined, insurers, Reg. 2412

Mean Canadian outstanding premiums

- defined [repealed], Reg. 2400(1)

Mean Canadian reserve liabilities

- defined, insurers, Reg. 2400(1)

Mean maximum tax actuarial reserve

- defined, insurers, Reg. 2400(1)

Mean policy loans

- defined [repealed], Reg. 2400(1)

Mechanic, *see* Apprentice: mechanic

Media, *see* Journalism

Medical devices and equipment

- prescribed, 118.2(2)(m), Reg. 5700

Medical doctor, *see also* Physician

- certification for disability credit, 118.3(1)(a.2)
- defined, 118.4(2)
- examination fees to qualify as, tuition credit, 118.5(1)(d)
- fees of, medical expense credit, 118.2(2)(a)
- income of, *see* Professional practice

Medical expenses

- air conditioner, Reg. 5700(c.3)
- alarm for infant, Reg. 5700(r)
- altered auditory feedback device, Reg. 5700(z.1)
- ambulance, 118.2(2)(f)
- animal trained to assist impaired person, 118.2(2)(l)
- artificial eye, 118.2(2)(i)
- attendant care, 64(a)A(ii)(J), 118.2(2)(b), (b.1), (c)
- artificial limb, 118.2(2)(i)
- balance disorder, pressure pulse therapy device for, Reg. 5700(z.4)
- blind aids, *see* Blind person
- bliss symbol board, 64(a)A(ii)(N), Reg. 5700(x)
- blood sugar measuring device, Reg. 5700(s)
- bone marrow transplant, 118.2(2)(l.1)
- braille note-taker, 64(a)A(ii)(O), Reg. 5700(y)
- captioning services, 64(a)A(ii)(A), 118.2(2)(l.4)
- catheters and catheter trays, 118.2(2)(i.1)
- celiac disease patients, gluten-free food costs, 118.2(2)(r)
- closed-caption TV decoder, Reg. 5700(q)
- colostomy pad, 118.2(2)(i)
- cosmetic purposes, expenses disallowed, 118.2(2.1)
- credit for
 - non-refundable, 118.2
 - refundable, 122.51
- crutches, 118.2(2)(i)
- deaf-blind intervening services, 118.2(2)(l.44)
- deduction for, 64
- deemed, 118.2(3)
- deemed payment of, 118.2(4)

- defined, 118.2(2)
- denture costs, 118.2(2)(p)
- devices and equipment, Reg. 5700
- diapers for incontinence, 118.2(2)(i.1)
- driveway alterations, 118.2(2)(l.6)
- drugs, 118.2(2)(n), (s), Reg. 5701
- elastic support hose, Reg. 5700(u)
- electrotherapy device, Reg. 5700(z.2)
- extremity pump, Reg. 5700(u)
- eyeglasses, 118.2(2)(j)
- fertility treatment, 118.2(2)(a), 118.2(2.2)
- full-time attendant for physically or mentally impaired person, 118.2(2)(b), (c)
- gluten-free food costs, 118.2(2)(r)
- group home care, 118.2(2)(b.2)
- guide dog, 118.2(2)(l)
- hardwood flooring disallowed, 118.2(2)(l.2)(i), (ii), 118.2(2)(l.21)(i), (ii)
- Health Canada Special Access Programme, 118.2(2)(s), (t)
- hearing aid, 118.2(2)(i)
- hearing loss, rehabilitative therapy, 118.2(2)(l.3)
- home construction for disabled person, 118.2(2)(l.21)
- home renovations, 118.2(2)(l.2)
 - duplicate claim of home accessibility tax credit permitted, 118.041(4)
- hospital bed, Reg. 5700(h)
- hot tub disallowed, 118.2(2)(l.2)(i), (ii), 118.2(2)(l.21)(i), (ii)
- ileostomy pad, 118.2(2)(i)
- *in vitro* treatment, 118.2(2)(a), 118.2(2.2)
- incontinence-related products, 118.2(2)(i.1)
- inductive coupling osteogenesis stimulator, Reg. 5700(v)
- infusion pump, Reg. 5700(s)
- insulin, 118.2(2)(k)
- iron lung, 118.2(2)(i)
- kidney machine, 118.2(2)(i)
- laboratory procedures, 118.2(2)(o)
- laryngeal speaking aid, 118.2(2)(i)
- learning disability, tutoring, 64(a)A(ii)(H), 118.2(2)(l.91)
- limb brace, 118.2(2)(i)
- lip reading training, 118.2(2)(l.3)
- liver extract, injectible, 118.2(2)(k)
- marijuana, 118.2(2)(u)
- medical equipment and devices, 118.2(2)(i), (k)
 - prescribed, 118.2(2)(m)
- medical practitioners etc., references to, 118.4(2)
- mental or physical impairment, 118.2(2)(b)–(e), 118.3
- transfer of unused credit to spouse, 118.8
- modifications to dwelling for physically impaired person, 118.2(2)(l.2)
- moving expenses, 118.2(2)(l.5)
- notch provision, 118.2(1)D
- note-taking services, 64(a)A(ii)(F), 118.2(2)(l.41)
- optical scanner, 64(a)A(ii)(D), (Q)
- orthopaedic shoe, etc., Reg. 5700(e)
- oxygen concentrator, 118.2(2)(i)
- oxygen, oxygen tent and oxygen equipment, 118.2(2)(k)
- pacemaker, Reg. 5700(d)
- page turner, Reg. 5700(z), 64(a)A(ii)(P)
- partial dependency, 118.3(3)
- phototherapy equipment, 118.2(2)(i)
- prescribed devices and equipment, 118.2(2)(m), Reg. 5700
- pressure pulse therapy device, Reg. 5700(z.4)
- print reader, 64(a)A(ii)(D), (Q)
- private health services plan premiums, 118.2(2)(q)
 - employee contributions to employee life and health trust, 144.1(10)
- reading services, 118.2(2)(l.43)
- real-time captioning services, 64(a)A(ii)(A), 118.2(2)(l.4)
- refundable credit, additional, 122.51

Medical expenses (cont'd)

- rehabilitative therapy for hearing/speech loss, 118.2(2)(1.3)
- reimbursed, 118.2(3)
- • by employer, 118.2(3)(a)
- rocking bed, 118.2(2)(i)
- sign language interpretation services, 64(a)A(ii)(A), 118.2(2)(1.4)
- sign language training, 118.2(2)(1.3)
- Special Access Program devices or drugs, 118.2(2)(s), (t)
- speech loss, rehabilitative therapy, 118.2(2)(1.3)
- speech synthesizer, 64(a)A(ii)(E), Reg. 5700(p)
- spinal brace, 118.2(2)(i)
- standing therapy device, Reg. 5700(z.3)
- syringe, Reg. 5700(b)
- TDD, 64(a)A(ii)(B), Reg. 5700(k)
- talking textbooks, 64(a)A(ii)(I), Reg. 5700(w)
- therapy, 118.2(2)(1.9)
- • for hearing or speech loss, 118.2(2)(1.3)
- training courses to care for infirm dependant, 118.2(2)(1.8)
- transportation services, 118.2(2)(g)
- • where ambulance etc. not available, 118.2(4)
- travelling expenses, 118.2(2)(h)
- truss, hernia, 118.2(2)(i)
- tutoring services, 64(a)A(ii)(H), 118.2(2)(1.91)
- van for use with wheelchair, 118.2(2)(1.7)
- vitamin B12, 118.2(2)(k)
- voice recognition software, 64(a)A(ii)(G), 118.2(2)(1.42)
- walker, 118.2(2)(i), Reg. 5700(i)
- wheelchair, 118.2(2)(i)
- wheelchair lift, Reg. 5700(m)
- wig, Reg. 5700(a)

Medical instruments (small)

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

Medical practitioner

- defined, 118.4(2)

Medical Research Council

- payments to, as R&D expenditures, 37(1)(a)(ii)(B), 37(7)“approved”
- research grants, taxable, 56(1)(o)

Medicine

- charitable donation from inventory, additional deduction before 2017, 110.1(1)(a.1), (8)

Melford Developments case overruled, Income Tax Conventions Interpretation Act s. 3**Member**

- credit union, defined, 137(6)“member”
- deferred profit sharing plan, defined, Reg. 8300(1)
- Parliament
- • allowance non-taxable, 6(1)(b)(i)(A)
- • election contributions
- • • credit, 127(3)
- • • records of, 230.1
- • income treated as employment income, 248(1)“office”
- • retirement compensation arrangement of, Reg. 6802.1
- • retiring allowances, 60(j.04)
- partnership, *see* Partner
- pension plan, defined, 147.1(1), Reg. 8300(1)
- pooled pension plan, defined, 147.5(1)

Member affiliate

- defined
- • for dividend from non-resident corporation, 90(15)“specified amount”B(b)
- • for FAPI partnership deeming rule, 93.1(4)(a)

Member-funded pension plan, Reg. 8510(9)**Member of Parliament, *see* Member: Parliament****Member of the taxpayer's household**

- defined, Reg. 7304(1)

Membership dues

- employee, deduction, 8(1)(i)(i), (iv)–(vi)
- recreational club etc., not deductible, 18(1)(l)(ii)

Memorial Grant Program for First Responders

- killed in line of duty, tax-free benefit to families, 81(1)(j)

Mental or physical health

- counselling related to
- • value not included in employee's income, 6(1)(a)(iv)

Mental or physical impairment, *see also* Blind person; Hearing impairment; Infirm dependant; Mobility impairment

- attendant care expenses, deduction from income, 64(a)A(ii)(J)
- • residents absent from Canada, 64.1
- certification by health care professional
- • for disability credit, 118.3(1)(a.2)
- credit for, 118.3
- • full-time attendant, 118.2(2)(b), (c)
- • partial dependant, 118.3(3)
- • unused, transfer to spouse, 118.8
- deduction for
- • various medical expenses, 64
- disability supports deduction, 64
- home purchase credit, *see* First-Time Home Buyer's Credit and Disability Home Purchase Credit
- Minister may obtain advice from Dept. of Human Resources Development re, 118.3(4)
- modifications to dwelling, tax credit for, 118.2(2)(1.2)
- nature of, 118.4(1)
- RESP age requirements, waiver, 146.1(2.2)
- RESP enrolment requirements, part-time allowed, 146.1(2)(g.1)(i)(B)
- specified disabled person
- • defined, for Home Buyers' Plan, 146.01(1)
- • loan from RRSP to acquire home for, 146.01(1)“supplemental eligible amount”
- student, 118.6(3)
- “totally and permanently disabled”
- • meaning of, for pension plans, Reg. 8500(1)

Merchant navy veteran pension, exempt, 81(1)(d)**Merger, *see also* Amalgamation**

- absorptive, of foreign corporations, 87(8.2)
- cross-border, 128.2
- deemed receipt of shares on, 87(1.1)
- foreign, *see* Foreign merger
- triangular, 87(9)

Metal fabricator (fitter)

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

Methods of accounting prohibited, *see* Accounting**Metric scales, capital cost allowance, Reg. Sch. II:Cl. 12(p)****Mexico, *see also* Foreign government**

- certain bonds of, *see* Brady bond
- escisión, treatment of shareholder, 15(1.5)
- *Mickleborough* case overruled, 66.1(1)“Canadian exploration expense”(k.2) [repealed]
- stock exchange recognized, 262

Middle East

- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(c)–(f) [repealed]

Migration, *see* Becoming resident in Canada; Ceasing to be resident in Canada**Mileage allowances, Reg. 7306****Millwright**

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

Mine

- buildings, Reg. Sch. II:Cl. 10(g), Sch. II:Cl. 41
- capital cost allowance, Reg. 1100(1)(w)–(ya.2), 1100A
- • definitions, Reg. 1104(5)–(8)

Index

- Mine (*cont'd*)
 - defined, Reg. 1104(6)(b), 1104(7)(a), 1206(1), 3900(1)
 - depletion allowance, *see* Depletion allowances
 - equipment etc., Reg. Sch. II:Cl. 10(k)–10(m), Sch. II:Cl. 41
 - exempt income from, Reg. 1100A [Revoked], Part XIX [Revoked]
 - exploration and development expenses, 66
 - income from a, meaning of, Reg. 1104(5), (6)(a)
 - industrial mineral, Reg. 1100(1)(g), Reg. Sch. V
 - separate class, Reg. 1101(4)
 - new or expanded
 - separate capital cost allowance classes, Reg. 1101(4a)–(4d)
 - property, Reg. Sch. II:Cl. 28, Sch. II:Cl. 41
 - shafts etc., Reg. Sch. II:Cl. 12(f)
 - townsite costs, *see* Townsite costs
- Mineral**
 - defined, 248(1)
 - for capital cost allowances, Reg. 1104(3)
- Mineral Exploration Tax Credit**
 - expenditures that qualify, 127(9)“flow-through mining expenditure”
 - investment tax credit of 315%, 127(5)(a)(i), 127(9)“investment tax credit”(a.2)
 - carryforward or carryback, 127(9)“investment tax credit”(c)
 - reduction for assistance received, 127(11.1)(c.2)
- Mineral ore**
 - defined, Reg. 3900(1)
- Mineral resource**
 - defined, 248(1)
- Mineral rights**
 - dealers in, limitation, 66(5)
- Mini-golf relief (COVID)**, Reg. 8901.1(2)(b)(ix)(A)(V), *see also* Qualifying tourism or hospitality entity
- Minimum amount**
 - defined
 - for minimum tax, 127.51
 - for registered pension plan, Reg. 8506(5), (7)
 - special rule for 2008, Reg. 8506(7)(b)
 - for RRIF, 146.3(1)“minimum amount”, Reg. 7308(3), (4)
 - for RRSP rollover for 2015, 60.022(5)(c), (d)
 - special rule for 2008, 146.3(1.1), (1.2)
 - special rule for 2020, 146.3(1.4), (1.5)
 - requirement to withdraw from RRIF annually, 146.3(1)“retirement income fund”
- Minimum tax**, 127.5–127.55
 - additional tax for income not earned in a province, and, 120(4)“tax otherwise payable under this Part”
 - additional tax re
 - excluded from instalment estimates for farmers and fishermen, 155(1)(a)
 - adjusted taxable income, 127.52
 - basic exemption, 127.53
 - basic minimum tax credit, 127.531
 - carryback re
 - effect on interest payable to taxpayer, 164(5), (5.1)
 - no effect on interest payable, 161(7)
 - carryover, 120.2
 - additional tax, determination of, 120.2(3)
 - where not applicable, 120.2(4)
 - excluded from “tax payable” etc. under Part I, 117(1)
 - foreign tax credit, 127.54
 - partnership investing in residential property or Canadian film, 127.52(2)
 - Quebec abatement and, 120(4)“tax otherwise payable under this Part”
 - where not applicable, 127.55
- Mining**
 - defined, Reg. 1104(3)
 - exemption from non-resident withholding tax on dividends, 213
 - Mining expenditure**
 - flow-through, *see* Critical Mineral Exploration Tax Credit; Mineral Exploration Tax Credit
 - Mining exploration depletion base**
 - defined, Reg. 1203(2)
 - expenses added to
 - amounts receivable, portion included in income, 59(3.3)(f)
 - Mining exploration expenses, “grass-roots”**
 - expenses in first 60 days of year, 66.1(8)
 - partnership deemed not at arm’s length, 66(17)
 - Mining operations**
 - defined, for mining tax deduction, Reg. 3900(1)
 - Mining property**, *see also* Canadian resource property
 - capital cost allowance, Reg. Sch. II:Cl. 28, Sch. II:Cl. 41
 - defined, 35(2)
 - excluded from flow-through share renunciation, 66(12.62)(b.1)
 - prospector’s exemption, 35
 - Mining reclamation trust [repealed]**, *see* Qualifying environmental trust
 - Mining taxes**
 - credit, *see* Pre-production mining expenditure
 - deduction, 20(1)(v), Reg. 3900
 - Minister of Canadian Heritage**, *see also* Canadian Heritage, Department of
 - certification of accredited film/video production, 125.5(1)“accredited film or video production certificate”
 - revocation of certificate, 125.5(6)
 - certification of Canadian film/video production, 125.4(1)“Canadian film or video production certificate”
 - revocation of certificate, 125.4(6)
 - Minister of Finance**
 - appointed, *Financial Administration Act* s. 14
 - Minister of National Revenue**, *see also* Canada Revenue Agency
 - advice from Dept. of Human Resources Development re mental or physical impairment, 118.3(4)
 - arbitrary assessment by, 152(7)
 - authority re determination of charitable foundation’s “prescribed amount”, 149.1(1.2)
 - authorized to accept security for payment of tax etc., 220(4)–(4.4)
 - burden of proof in assessing penalty, 163(3)
 - certificate of exemption, 212(1)(b)(iv), (14)
 - certificate re proposed disposition of property by non-resident, 116(2)
 - chief source of income, determination re, 31
 - consent to change of fiscal period, 249.1(7)
 - consent to sale of property bound by Court-registered certificate re amount payable, 223(9), (10)
 - defined, 248(1)
 - delegation of powers and duties, 220(2.01), Reg. Part IX; *Interpretation Act* s. 24(2)
 - determination of amounts under s. 245, 152(1.11), (1.12)
 - binding effect, 152(1.3)
 - determination of excessive refund, 160.1(1)
 - determination of losses by, 152(1.1), (1.2)
 - binding effect, 152(1.3)
 - direction re collection, 225.2
 - discretion re transfer pricing adjustments, 247(10)
 - duties of
 - administration and enforcement of Act, 220(1)
 - disposition of appeal, on, 164(4.1)
 - refunds, 164(4.1)
 - when objection filed, 165(3)
 - inquiry authorized by, 231.4(1)
 - investigatory powers re tax shelters, 237.1(8)
 - not bound by return, 152(7)

- Minister of National Revenue (*cont'd*)
- notice of, to provide information, 231.2
 - permission to destroy records, 230(4), (8)
 - powers
 - acquire and dispose of debtor's tax property, to, 224.2
 - extension of filing date, 220(3)
 - seize moneys restorable to tax debtor, to, 224.3
 - RPP, authority to impose conditions re, 147.1(5)
 - registered investments and, 204.4(2)–(5), 204.5
 - required to assess tax, 152(1)
 - restrictions on collection, 225.1
 - collection in jeopardy, 225.2
 - revocation of registration of charity, 168
 - tax shelter identification number, issuance of, 237.1(3)
 - waiver of penalty or interest, 220(3.1)
 - waiver of requirement to file form or document, 220(2.1)
- Minister (of religion)**, *see* Clergy
- Minister of the Environment**
- certification of ecologically sensitive land, *see* Ecological gifts
 - permission to dispose of ecologically sensitive land, 207.31
- Minor**, *see also* Age; Child
- amount payable by trust to, 104(18)
 - transfers and loans to, 74.1(2)
 - corporation, through, 74.5(6)–(11)
 - deemed, 74.5(6)–(11)
 - for value, 74.5(1), (2)
 - joint liability for tax on, 160(1)–(3)
 - repayment of, 74.1(3)
 - trust, through, 74.3, 74.5(9), (10)
 - trust for, 104(18)
- Minor term annuity**
- rollover to RRSP, 60.011(2)(b)
- Misclassified property**, 13(6)
- Misrepresentation**
- justification for late reassessment, 152(4)(a)(i), 152(5)
 - of other person's tax affairs, penalty, 163.2
 - of own tax affairs, penalty, 163(2)
- Mission, operational**, *see* Deployed operational mission
- Mobile crane operator**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Mobility impairment**, *see also* Disability; Impairment
- building modifications for, deductible, 20(1)(qq)
 - device to permit person with, to drive vehicle
 - medical expense, Reg. 5700(m)
 - driveway alterations for person with, 118.2(2)(l.6)
 - moving expenses for person with, 118.2(2)(l.5)
 - transportation and parking for person with, not taxable benefit, 6(16)
- Modern Times/Nordic Entertainment spinoff**, Reg. 5600(1)
- Modifications (to building)**
- disability-related, deductible, 20(1)(qq)
 - dwelling, for disabled person, medical expense credit, 118.2(2)(l.2)
- Modified GAAP**, *see* Generally accepted accounting principles
- Modified net premium (re insurance policy)**
- defined, Reg. 1408(1), (3)
- Mohel**
- payment to, medical expense credit, 118.2(2)(a)
- Mold, capital cost allowance**, Reg. Sch. II:Cl. 12(c)
- Moldovan case reinstated**, 31(1)
- Mole, capital cost allowance**, Reg. Sch. II:Cl. 1(f), Sch. II:Cl. 3
- Monetary contribution**
- for political contribution credit
 - credit for, 127(3)
 - defined, 127(4.1), *Canada Elections Act* s. 2(1)
- Money**
- borrowed, *see* Borrowed money
 - business of lending, *see* Moneylender
 - included in definition of property, 248(1)“property”
- Money market fund**
- ineligible for December 15 year-end election, Reg. 4801.01
- Money purchase limit**
- defined, 147.1(1), 248(1)
 - limits pension contributions, 147.1(8), (9)
 - limits RRSP contribution, 146(1)“RRSP dollar limit”
- Money purchase provision**, *see* Registered pension plan: money purchase provision
- Money services business**
- defined, for electronic funds transfer reporting, 244.1
- Moneylender**, *see also* Financial institution
- bad debts
 - deduction for, 20(1)(p)(ii)
 - inclusion in income, 12.4
 - disposition of Canadian securities, 39(5)(f)
 - guarantees etc.
 - acquired from, in amalgamation, 87(2)(h)(iii)
 - reserve for, 20(1)(l.1)
 - loan/lending asset
 - acquired from, in amalgamation, 87(2)(h)(ii)
 - reduction in value of
 - limitation on deduction, 18(1)(s)
 - loans etc. acquired in ordinary course of business, 20(27)
 - reserve for doubtful debts, 20(1)(l)
 - security used or held by
 - “eligible property” for transfer to corporation by shareholder, 85(1.1)(g)
 - superficial loss not deductible, 18(13), (15)
- Monitor**
- crib death, medical expense, Reg. 5700(r)
- Monk**
- income of, not taxed, 110(2)
- Month**
- defined, *Interpretation Act* s. 35(1)
- Monthly withholding amount**
- defined, for new employers remitting quarterly, Reg. 108(1.21)
- Montreal**
- international banking centre until 2013, 33.1(3)
 - stock exchange, designated, 262 (Notes), *see also* Bourse de Montréal Inc.
- Morasse case overruled re shareholder benefit**, 15(1)(a)
- More than five full-time employees**, *see* Six employees test
- Morgan Stanley Capital Investment Index units**
- qualified investments for deferred income plans, Reg. 4900(1)(n.1)
- Morrissey case overruled**, 122.6“shared-custody parent”(b)
- Mortality gain**
- defined, Reg. 308(2)
- Mortality loss**
- defined, Reg. 308(2)
- Mortgage**, *see also* Debt
- expropriation assets acquired for sale of foreign property, 80.1
 - foreclosure, 79
 - interest
 - blended with principal in payments, 16(1), 214(2)
 - deduction for, 20(1)(c), *see also* Work space in home
 - investment corporation, *see* Mortgage investment corporation
 - not a disposition, 248(1)“disposition”(j), (k)
 - RRSP investment, Reg. 4900(1)(j)–(j.2)
 - sale of, included in proceeds of disposition, 20(5), (5.1)
 - subsidy by employer, taxable benefit, 6(23)

Index

Mortgage-backed securities

- eligible for investment by RRSP, etc., Reg. 4900(1)(j)–(j.2)

Mortgage insurance

- defined, for insurers' policy reserves, Reg. 1408(1)

Mortgage Insurance Corporation of Canada

- payments to guarantee fund deductible, Reg. 1400(3)G

Mortgage investment corporation, 130.1

- deemed public corporation, 130.1(5)
- defined, 130.1(6), 248(1)
- election re capital gains dividend, 130.1(4), Reg. 2104.1
- • where not made, 130.1(4.1)
- non-qualifying taxed capital gains, 130.1(9)
- not subject to mark-to market rules, 142.2(1)“financial institution”(c)(ii)
- qualifying taxed capital gains, 130.1(9)
- shareholders, how counted, 130.1(7)

Mortgage subsidy

- taxable benefit, 6(23)

Motion picture film

- Canadian film or video production credit, 125.4
- capital cost allowance, Reg. Sch. II:Cl. 10(s), Sch. II:Cl. 12(m)
- certified production, *see* Certified production
- film or video production services credit, 125.5
- in-flight movies not treated as entertainment, 67.1(4)(a)
- partnership investing in
 - capital cost allowance limitation, 127.52(2)
- payment to non-resident for use of, 212(5)
- revenue guarantee, exemption from at-risk rules, 96(2.2)(d)(ii) [repealed]
- shelters prohibited, 18.1(17)

Motor vehicle

- accident claims, payments exempt, 81(1)(q), Reg. 6501
- capital cost allowance
 - of employee, 8(1)(j), Reg. 1100(6)
 - of person carrying on business, 20(1)(a), Reg. 1100(1)(a)(x)
- defined, 248(1)
- device to enable disabled person to drive, Reg. 5700(h)
- employee's allowance for use of
 - not income, 6(1)(b)(vii.1)
 - where deemed not reasonable, 6(1)(b)(x), (xi)
- employment by U.S. resident on, Canada-U.S. Tax Treaty:Art. XV:3
- expenses
 - limitations on, *see* Passenger vehicle
 - of employee, when deductible, 8(1)(f), (h.1)
- loan to shareholder/employee to purchase, 15(2.4)(d)
- recapture of excess CCA, 13(2)
- terminal loss rules not applicable, 20(16.1)

Motor vehicle body repairer (metal and paint)

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

Motor vehicle warranty, *see* Extended motor vehicle warranty

Motorcycle mechanic

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

Moufarrège case overruled, 20.1

Mould

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

Movable property

- defined
 - *Quebec Civil Code*, art. 900–907

Movie, *see* Motion picture film

Movie theatres relief (COVID), Reg. 8901.1(2)(b)(xiv), *see also* Qualifying tourism or hospitality entity

Moving expenses, *see also* Relocation

- certain students, 62(2)
- deduction for, 62(1)

- • residents absent from Canada, 64.1
- defined, 62(3)
- medical expense credit, 118.2(2)(l.5)
- moving to United States, Canada-U.S. Tax Treaty:Art. XIII:6
- “new work location”, 62(1)
- residents absent from Canada
 - deduction, 64.1

Multi-employer plan (RPP)

- anti-avoidance, 147.1(14)
- defined, 147.1(1), Reg. 8500(1)
- pension adjustment limits, 147.1(9)
- registration requirements, Reg. 8510(7)
- special rules, Reg. 8510(5)
- when revocable, 147.1(9)

Multigenerational Home Renovation Tax Credit, 122.92

Multilateral Instrument, *see before* Canada-US Tax Treaty

Multinational enterprise group

- defined, for country-by-country reporting, 233.8(1)
- defined, for transfer pricing rules, 247(1)

Multi-tier alignment

- defined (for corporate inclusion of partnership income), 34.2(1)
- election, 249.1(9)
- no stub-period accrual for earlier years, 34.2(9)

Multi-tier alignment election

- for partnership, 249.1(9)

Multiple counting of deductions or credits, 248(28)

Multiple mine property

- capital cost allowance, Reg. 1100(1)(ya.2)
- separate prescribed class, Reg. 1101(4h)

Multiple-unit residential buildings

- capital cost allowance, Reg. Sch. II
 - separate classes, Reg. 1101(5b)

Municipal body performing function of government, *see* Public body: performing function of government

Municipal waste

- defined, Reg. 1104(13)
- included in eligible waste fuel, Reg. 1104(13)“eligible waste fuel”
- used as fuel, Reg. Sch. II:Cl. 43(e)(i)(A), Sch. II:Cl. 43.1(d)(ix)

Municipality, *see also* Government

- assistance by, *see* Assistance/government assistance
- bonds of
 - constitute qualified securities for securities lending arrangement rules, 260(1)“qualified security”(c)
 - no non-resident withholding tax, 212(1)(b)(ii)(C)(III)
- corporation controlled by, excluded from refundable ITC, 127.1(2)“excluded corporation”(a)(ii)
- corporation owned by
 - bonds of, no non-resident withholding tax, 212(1)(b)(ii)(C)(IV)
 - deemed not private corporation for Part IV tax, 227(16)
 - election to remain taxable, 149(1.11)
 - exempt from tax, 149(1)(d.5)
 - donation to, 149.1(1)“qualified donee”(a)(ii)
 - by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
- elected officer or school board trustee, expense allowance exempt, 81(3) [before 2019]
- exempt from tax, 149(1)(c)
- gifts to, *see* donation to (above)
- officials, bribery of, no deduction, 67.5
- property taxes
 - farmland
 - addition to adjusted cost base, 53(1)(i)(iii)(A)
 - deduction by partner where partnership disposes of land, 101(c)(i)
 - limitation on deduction, 18(2)(b)

Municipality (*cont'd*)

- representation to, expenses deductible, 20(1)(cc)
- support payments for farmers by, information slips, Reg. 234–236
- townsite costs, *see* Townsite costs
- volunteer emergency worker
 - exemption for, 81(4)
- welfare, *see* Social assistance payment

Museums relief (COVID), Reg. 8901.1(2)(b)(v), *see also* Qualifying tourism or hospitality entity**Musical instrument**

- capital cost allowance, Reg. Sch. II:Cl. 8(i)
- costs, to employee, 8(1)(p)

Musical work, copyright royalties

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

Musician

- deduction from employment income, 8(1)(p), (q)
- U.S. resident, Canada-U.S. Tax Treaty:Art. XVI

Mute person

- speech synthesizer
- disability supports deduction, 64(a)(ii)(E)
- medical expense credit, Reg. 5700(p)

Mutual agreement procedure, Canada-U.S. Tax Treaty:Art. XXVI**Mutual corporation**

- provincial life insurance corporation converted into, 139

Mutual fund, *see also* Mutual fund corporation; Mutual fund trust

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

Mutual fund corporation, 131

- amalgamation, 87(2)(bb)
- capital gains dividends, election, 131(1)–(1.4), Reg. 2104
 - interest on, 131(3.1), (3.2)
- capital gains on Canadian securities, 39(5)
- capital gains redemptions, defined, 131(6)
- deemed private corporation, 131(5)
- defined, 131(8), (8.1), 248(1)
- distributions to non-residents, tax on, 218.3
- dividend refund to, 131(5)
- election not to be restricted financial institution, 131(10)
- exempt from stock buyback tax, 183.3(1)“covered entity”(b)(i)
- increase in paid-up capital not deemed dividend, 131(4)
- information return where share claimed to be qualified investment, Reg. 221
- non-residents, distributions to, tax on, 218.3
- non-residents, for benefit of, 131(8.1)
- not subject to mark-to-market rules, 142.2(1)“financial institution”(c)(iii)
- payment of tax, 157(3)
- qualified investment for RRSP, RRIF, etc.
 - bond or debenture of trust, Reg. 4900(1)(c.1)
 - unit of trust, Reg. 4900(1)(c)
- refund to, re capital gains dividend, 131(2), (3)
- refundable capital gains tax on hand, 131(6)
 - reduction of, 131(9)
- rollover of property to mutual fund trust, 132.2
- shares of
 - transferred in exchange for units of mutual fund trust, 132.2(3)(l)
- switch fund
 - conversion to mutual fund trusts tax-free, 132.2(1)“qualifying exchange”
 - no rollover of shares allowed, 131(4.1)
- taxable Canadian property, gains distributed to non-residents, 131(5.1), (5.2)
- taxed capital gains, 131(7)
- transitional election to be MFC for 2016–17, 131(8.01)

Mutal fund limited partnership

- financing, restrictions on, 18.1

Mutual fund trust, 132

- allocation to redeemers, 132(5.3)
- amounts designated by, 132.1
 - adjusted cost base of unit, 132.1(2)
 - deduction for, 132.1(1)(c)
 - carryover, 132.1(4)
 - limitation, 132.1(3)
 - inclusion in taxpayer’s income, 132.1(1)(d)
 - where designation of no effect, 132.1(5)
- capital gains on Canadian securities, 39(5)
- capital gains redemptions, defined, 132(4)
- capital gains refund to, 132(1), (2)
 - interest on, 132(2.1), (2.2)
- defined, 132(6)–(7), 248(1)
 - election to be from beginning of first taxation year, 132(6.1)
 - following rollover of assets in qualifying exchange, 132.2(3)(k)
 - retention of status to end of calendar year, 132(6.2)
- distributions to non-residents, tax on, 218.3
- election for December 15 year-end, 132.11
- allocation or designation of amount to be included in income, 132.11(6)
 - late filing of allocation or designation, 220(3.21)(b)
- exemption from Part XII.2 tax, 210(2)(c)
- information return, Reg. 204, 204.1
 - that trust is qualified investment, Reg. 221
- instalment payments of tax, 156(2)
- interest received by, on behalf of non-residents, exemption, 212(9)(c)
 - minimum tax not payable by, 127.55(f)(ii)
- non-residents, distributions to, tax on, 218.3
- non-residents, for benefit of, 132(7)
- not subject to mark-to-market rules, 142.2(1)“financial institution”(d)
 - obligation guaranteed by, qualified investment for deferred income plan, Reg. 4900(1)(i)
- qualified investment for RRSP, RRIF, etc.
 - bond or debenture of trust, Reg. 4900(1)(d.1)
 - unit of trust, Reg. 4900(1)(d)
- real estate investment trust as, 132(6)(b)(ii)
- redemptions, allocation to redeemers, 132(5.3)
- refundable capital gains tax on hand
 - defined, 132(4)
- rollover of property to another mutual fund trust, 132.2
- SIFT conversion to corporation
 - exchange of employee stock options, 7(1.4)(b)(vi)
- taxable Canadian property, gains distributed to non-residents, 132(5.1), (5.2)
- taxable capital gains
 - taxation year, election for December 15, 132.11
- taxed capital gains, 132(5)
- transfer of property from mutual fund corporation or trust, 132.2
 - unit of
 - adjusted cost base of, 53(1)(d.2)
 - “Canadian security”, 39(6)
 - deemed to be a share for rollover purposes, 132.2(1)“share”
 - employee option to acquire, 7(1), 110(1)(d)
 - transferred in course of qualifying exchange, 132.2(3)(a.1), (f)
 - whether subject to stock buyback tax, 183.3(1)“covered entity”(b)(ii), 183.3(2)
- year-end, election for December 15, 132.11

Mutual holding corporation

- deemed dividend on distribution by, 139.2
- defined, for insurance demutualization, 139.1(1)

Index

Mutual insurance corporations

- exemption for, 149(1)(m)

Mutual life insurance corporation

- provincial corporation converted into, 139

Mutualization proposal (for insurer), 139

N

NDDA, *see* Non-deductible distributions amount

NERD TOH, *see* Non-eligible refundable dividend tax on hand

NFE

- defined, for Common Reporting Standard, 270(1)“non-financial entity”

NFFE

- defined, for certain purposes (re FATCA), 265(4)(b)

NFVA, *see* Net fair value amount

NISA, *see* Net income stabilization account

NISA Fund No. 2, *see also* Net income stabilization account

- amount credited to, not taxed, 12(10.3)
- deemed paid on acquisition of control of corporation, 12(10.4)
- deemed paid on death, 70(5.4)
- defined, 248(1)
- disposition of, 73(5)
- paid to non-resident, withholding tax, 212(1)(t), 214(3)(l)
- information return required, Reg. 202(2.1)
- receipt from, included in income, 12(10.2)
- constitutes active business income, 125(7)“income of the corporation for the year from an active business”
- information return required, Reg. 201(1)(e)
- right to benefit, no tax on emigration, 128.1(10)“excluded right or interest”(i)
- rollover to corporation, 85(1)(c.1), 85(1.1)(i)
- transfer to spouse or spouse trust, 70(6.1), 73(5)(a), 104(5.1), (14.1)

NPP, *see* Non-portfolio properties

NQS, *see* Non-qualifying security

NR4 returns, Reg. 202

NR4 slips, Reg. 202

NRO, *see* Non-resident-owned investment corporation (before 2004)

NRT, *see* Trust (or estate): non-resident

NSERC, *see* Natural Sciences and Engineering Research Council

NSF cheque, *see* Cheque: dishonoured

NSULC, *see* Nova Scotia: unlimited liability company

NWA, *see* Net worth assessment

Nanini case overruled, 160(1)(e)(ii)

Narrow participation retirement fund

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

Nasdaq over-the-counter stocks

- qualified for deferred income plans before 2002, Reg. 4900(1)(s) [repealed]

National

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

National arts service organization, *see* Registered national arts service organization

National Child Benefit supplement, 122.61(1)C

National Defence, *see* Canadian Forces and veterans

National Film Board

- prescribed person for Canadian film/video tax credit, Reg. 1106(10)

National Life case overruled, 138(26), Reg. 1406(b)

National Revenue, Department of, *see* Minister (of National Revenue); Canada Revenue Agency

Natural gas, *see* Petroleum/natural gas

Natural person

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

- tax-protestor arguments, 248(1)“person” (Notes)

Natural Sciences and Engineering Research Council

- payments to, as R&D expenditures, 37(1)(a)(ii), 37(7)“approved”
- research grants, taxable, 56(1)(o)

Nature Conservancy

- prescribed donee, Reg. 3504(b)

Nature parks relief (COVID), Reg. 8901.1(2)(b)(v), *see also* Qualifying tourism or hospitality entity

Nav Canada

- debt of, qualified investment for deferred income plans, Reg. 4900(1)(q)

Nazi Germany

- compensation to victims of, 81(1)(g)

Needle/syringe

- medical expense, Reg. 5700(b)

Negative amounts

- adjusted cost base, deemed gain, 40(3), (3.1)
- capital cost allowance pool, recapture, 13(1)
- in formulas, deemed nil, 257
- investment tax credit balance, recapture, 127(27)–(36)
- taxable income cannot be less than nil, 248(1)“taxable income”
- undepreciated capital cost, recapture, 13(1)

Negative policy reserves

- of insurer, 12(1)(e.1), 20(22), Reg. 1400(2)

Neglect

- grounds for reassessment at any time, 152(4)(a)(i)

Negligence, *see* Gross negligence; Neglect

Nephew, *see* Niece/nephew

Net asset value

- defined, for mutual fund rules re allocation to redeemers, 132(4)

Net capital loss

- amalgamation, on, 87(2.1)
- carryover of, 111(1)(b)
- limitation, 111(1.1)
- death, on, 111(2)
- defined, 111(8), (9), 248(1)
- determination of, by Minister, 152(1.1), (1.2), (1.3)
- limitation on deductibility, 111(3)
- non-deductible where control of corporation changed, 111(4)
- partnership, from, 96(1)
- reassessment, 152(6)(c)
- reduction of, on debt forgiveness, 80(4)(b)
- subsidiary’s, on winding-up, 88(1.2)

Net corporate income tax rate

- defined, 248(1)

Net cost (of labour-sponsored funds share)

- defined, 127.4(1), 211.7(1)

Net cost of pure insurance

- defined, Reg. 308
- premium deductible where used as collateral, 20(1)(e.2)

Net decrease in the excess corporate holdings percentage

- for private foundation rules
- allocation of, 149.2(7)
- defined, 149.2(4)

Net distribution amount

- defined, for foreign affiliate liquidation and dissolution, 88(3.2)

Net earnings (of foreign affiliate)

- defined, Reg. 5907(1)
- exempt due to tax sparing, Reg. 5907(10)
- included in exempt earnings, Reg. 5907(1)“exempt earnings”(d)(i)
- included in taxable earnings, Reg. 5907(1)“taxable earnings”(b)

Net fair value amount

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

- Net family income**, *see* Adjusted income
- Net forgiveness amount**
- reserve for, 61.3(1)(a), 61.3(2)(a)
- Net income (on income tax return)**
- defined, 3
- Net income stabilization account**, *see also* NISA Fund No. 2
- administration fee, deductible, 20(1)(ff)
 - death of taxpayer, on, 70(5.4), 70(6.1)
 - defined, 248(1)
 - fair market value of, for certain capital gains exemption rules, 110.6(1.1)
 - money borrowed to contribute to, no deduction for interest, 18(11)(f)
 - no accrual of interest income, 12(3), 12(11)“investment contract”(j)
 - transfer to spouse or spouse trust, 70(6.1)
- Net increase in the excess corporate holdings percentage**
- for private foundation rules
 - allocation of, 149.2(5)
 - defined, 149.2(3)
- Net interest rate**
- defined, 211(1)
- Net loss (of foreign affiliate)**
- defined, Reg. 5907(1)
- Net past service pension adjustment (net PSPA)**
- defined, 146(1), 204.2(1.3)
- Net premium for the policy**
- defined, re policy reserves [repealed], Reg. 1408(1)
- Net premium reserve**
- re life insurance policy, defined, Reg. 1401(3)
- Net resource adjustment**
- defined, Reg. 5203(3.1)
 - reduces adjusted business income for M&P credit, Reg. 5203(1)“adjusted business income”(b)
- Net resource income**
- defined, Reg. 5203(3)
- Net surplus (of foreign affiliate)**
- defined, Reg. 5907(1)
- Net taxable capital gains**
- defined, 104(21.3)
- Net tax owing**
- defined (for instalments), 156.1(1)
- Net worth assessment**, 152(7)
- Netherlands**, *see also* Foreign government
- stock exchange recognized, 262
 - universities, gifts to, Reg. Sch. VIII, s. 20
- Network equipment**, *see* Data network infrastructure equipment
- Neuman case overruled**, 120.4
- New account**
- defined, for Common Reporting Standard, 270(1)
- New Brunswick**, *see also* Province
- Community Development bonds, eligible for RRSP investment, Reg. 4900(1)(i.1)
 - tax rates, *see* introductory pages
- New corporation**, *see* Amalgamation; Corporation
- New employer**
- defined, for quarterly remittances, Reg. 108(1.4)
- New entity account**
- defined, for Common Reporting Standard, 270(1)
- New gain**
- defined, for foreign currency debt after change of control, 40(10), (11)
- New individual account**
- defined, for Common Reporting Standard, 270(1)
- New law (post-1971)**
- defined, ITAR 12
 - references to, ITAR 13, 16
- New loss**
- defined, for foreign currency debt after change of control, 40(10), (11)
- New share**
- defined, Reg. 6202.1(5)
- New Zealand**, *see also* Foreign government
- currency loan, *see* Weak currency debt
 - stock exchange recognized, 262
 - trust resident in, exclusion from foreign property reporting, 233.3(1)“specified foreign property”(n)
 - universities, gifts to, Reg. Sch. VIII, s. 22
- Newfoundland and Labrador**, *see also* Province
- Canada–Newfoundland Atlantic Accord, communication of information for, 241(4)(d)(vi)
 - cod fishermen compensation, *see* Northern Cod Compensation and Adjustment Program
 - corporation incorporated in, before 1949
 - deemed incorporated in Canada, 248(1)“corporation incorporated in Canada”
 - labour-sponsored venture capital corporation of
 - prescribed, Reg. 6700(a)(iii), (xii)
 - offshore area
 - defined, 248(1)
 - included in “province”, 124(4)
 - prescribed area, for electrical energy or steam processing, 127(9)“qualified property”(c.1)
 - prescribed designated region, 127(9)“specified percentage”(a)(vi), Reg. 4607
 - prescribed stock savings plan, Reg. 6705(d)
 - qualified property acquired for use in, 127(9)“specified percentage”(a), (e)
 - tax rates, *see* introductory pages
- News online subscription credit**, 118.02
- News show**
- ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(i)
 - ineligible for film/video production services credit, Reg. 9300(2)(a)
- Newspaper**, *see* Journalism
- Newspaper advertising, limitation**, 19
- Next of kin travel benefit**
- paid to Canadian Forces member or veteran, exempt, 81(1)(d.1)(vii)(I)
- Nickel**, *see* Critical mineral
- Niece/nephew**
- defined, 252(2)(g)
 - dependent, 118(6)(b)
 - property transferred to, income attribution re, 74.1(2)
- Nil, minimum amount for formula calculations**, 257
- Nil income**
- equivalent to zero income, 3(f)
- Nightclubs relief (COVID)**, Reg. 8901.1(2)(b)(ii), *see also* Qualifying tourism or hospitality entity
- Nobel Prize, non-taxable**, Reg. 7700
- Nominee**, *see also* Bare trust
- defined, 127(3), *Senate Appointment Consultations Act*, s. 2(1)
- Non-arm’s length creditor**
- defined, 212(21)(a)
- Non-arm’s length indicator**
- application to foreign trust, 233.2(2)
- Non-arm’s length person**
- defined, for synthetic equity arrangements, 248(1)“synthetic equity arrangement”(a)(i)

Index

Non-arm's length person (*cont'd*)

- excessive payment where property surrendered to creditor, 79(3)E(a)
- interest on debt relating to acquisition of land, 18(3)“interest on debt relating to the acquisition of land”(b)
- loans to, 56(4.1)–(4.3)
- meaning of, *see* Arm's length: meaning of
- non-resident, transactions with
 - extended reassessment period, 152(4)(b)(iii)
 - information return, 233.1
- soft costs relating to construction, 18(3.1)(b), 18(3.2)(b)
- transfer of property to or from, 69(1)

Non-arm's length transactions

- agreement to pay low rent for property
 - effect on disposition of property, 69(1.2)
- amalgamated corporations, 251(3.1)
- corporation having, with non-resident persons
 - extended reassessment period, 152(4)(b)(iii)
 - information return, 233.1
- depreciable property acquired through, 13(7)(e)
 - corporations controlled by one trustee, 13(7.3)
- disposition at less than fair market value, 69(1)(b)
- inadequate considerations, 69
- income or gain from property transferred
 - transferor and transferee liable for tax, 160
- lease of depreciable property, 13(32)
- life insurance policy, disposition, 148(7), (8)
- non-resident, unreasonable consideration paid to, 247
- presumption, 251(1)(a)
- property disposed of in, ITAR 26(5)
- purchases at more than fair market value, 69(1)(a)
- rights or things transferred to beneficiary
 - deemed cost, 69(1.1)
- sale of shares, 84.1
 - non-resident, by, 212.1
- share for share exchange, 85.1(2)(a)
- transfer of property by tax debtor, 160
- transfer of right to income, 56(4)
- unpaid amounts, 78(1), (2)

Non-business income tax (foreign)

- deduction for, 126(1)
- defined, 126(7)
 - for trust, 104(22.4)

Non-cancellable or guaranteed renewable accident and sickness policy

- defined, Reg. 1408(1)

Non-capital loss

- amalgamation, on, 87(2.1), (2.11)
- carryover of, 111(1)(a)
 - corporation, by, 111(5)–(5.4)
 - winding-up of subsidiary, on, 111(5.4)
- defined, 111(8), (9), 248(1)
- determination of, by Minister, 152(1.1), (1.2), (1.3)
- employee life and health trust's, 111(7.3)–(7.5), 144.1(13)
- limitation on deductibility, 111(3)
- partnership, from, 96(1)
- reassessment, 152(6)(c)
- reduction of, on debt forgiveness, 80(3)(a), 80(4)(a)
- subsidiary's, on winding-up, 88(1.1)

Non-CCPC

- defined, 89(1)“low rate income pool”
- predecessor, 89(5)(b)

Non-competition agreement, *see* Restrictive covenant (or non-competition payment)

Non-compliant registered disability savings plan

- effect of, 146.4(10)
- meaning of, 146.4(11), (12)

Non-conventional lands, defined, Reg. 1206(1)

Non-Crown royalty

- defined, for mining tax deduction, Reg. 3900(1)

Non-deductible distributions amount

- defined, 104(16), 122(3)

Non-discretionary trust

- defined, 17(15)

Non-discrimination, Canada-U.S. Tax Treaty:Art. XXV

Non-eligible refundable dividend tax on hand

- defined, 129(4)
 - transitional determination for 2019, 129(5)
 - on amalgamation, 129(5.1)
 - refund of, 129(1)(a)(ii)(A)(II)

Non-financial entity

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

Non-government assistance

- defined, for investment tax credits, 127(9)
 - for carbon-capture (CCUS) credit, 127.44(1)
 - expired
 - increases investment tax credit, 127(10.8)
 - reduces investment tax credit, 127(11.1), (18), (19)
 - reduces SR&ED expenditures, 37(1)(d)
 - repaid
 - increases ITC, 127(9)“investment tax credit”(e.1), (e.2), 127(10.7)

Non-participating life insurance policy

- defined, 211(1)

Non-periodic payments

- tax deduction, Reg. 103

Non-portfolio earnings

- defined, for SIFT partnership distributions, 197(1)
- defined, for SIFT trust distributions, 122.1(1)

Non-portfolio properties

- defined, for SIFT trust and partnership distributions, 122.1(1), 248(1)

Non-profit association, *see* Non-profit organization

Non-profit corporation, *see also* Non-profit organization

- qualified investment for RRSP etc., Reg. 4900(1)(r)
- scientific research and experimental development, for
 - annual return, 149(7)
 - exemption, 149(1)(j)
 - payments to, 37(1)(a)(iii)

Non-profit organization, *see also* Charity; Non-profit corporation

- exemption for, 149(1)(l), 149(2)
 - deemed a trust, 149(5)
- foreign, defined, Reg. 6804(1)
- information return, whether required, 149(5), 149(12), 150(1)(a)

Non-qualified investment, *see also* Qualified investment

- charitable foundation
 - defined, Reg. 3700
- deferred profit sharing plan (DPSP)
 - acquisition of, tax on, 198(1)
 - defined, 204“qualified investment”
 - disposition of, refund of tax, 198(4)
 - initial, 199, 204“initial non-qualified investment”
 - tax on, 207.1(2)
- first home savings account (FHSA)
 - defined, 146.6(1), 207.01(1)
 - holding of, tax on, 207.04(1)
 - waiver of tax, 207.06(2)
 - investment becoming or ceasing to be, 207.01(6)
 - obligation of issuer, 207.01(5)
- private foundation
 - acquisition of, tax on, 189(1)
 - defined, 149.1(1)“non-qualified investment”

Index

Non-qualified investment (*cont'd*)

- proportional holdings election, 259(1), (3)
- registered disability savings plan (RDSP)
 - acquisition of, tax on, 207.04(1)
 - defined, 146.4(1)“qualified investment”, 207.01(1)
 - investment becoming or ceasing to be, 207.01(6)
 - obligation of promoter, 207.01(5)
 - tax on acquisition of, 207.04(1)
- registered education savings plan (RESP)
 - acquisition of, tax on, 207.04(1)
 - defined, 146.1(1)“qualified investment”, 207.01(1)
 - investment becoming or ceasing to be, 207.01(6)
 - obligation of promoter, 207.01(5)
 - revocation of plan, 146.1(2.1), (12.1)
 - tax on acquisition of, 207.04(1)
- registered retirement income fund (RRIF)
 - defined, 146.3(1)“qualified investment”, 207.01(1)
 - disposition of, 146.3(8)
 - holding of, tax on, 207.04(1)
 - waiver of tax, 207.06(2)
 - information return, Reg. 215(3)
 - investment becoming or ceasing to be, 207.01(6)
 - obligation of issuer, 207.01(5)
- registered retirement savings plan (RRSP)
 - acquisition of, 146(10)
 - defined, 146(1)“non-qualified investment”, “qualified investment”, 207.01(1)
 - disposition of, 146(6)
 - holding of, tax on, 207.04(1)
 - waiver of tax, 207.06(2)
 - information return, Reg. 214(2)
 - investment becoming or ceasing to be, 207.01(6)
 - obligation of issuer, 207.01(5)
- tax-free savings account (TFSA)
 - defined, 207.01(1)
 - holding of, tax on, 207.04(1)
 - waiver of tax, 207.06(2)
 - investment becoming or ceasing to be, 207.01(6)
 - obligation of issuer, 207.01(5)

Non-qualified security

- deduction to employer, 110(1)(e)
- defined, for stock option rules, 110(1.31), (1.4), (1.41)
- excluded from deduction to employee, 110(1)(d)
- notification to employee and CRA, 110(1.9)

Non-qualifying business

- defined, for FAPI rules, 95(1)

Non-qualifying corporation (for small business investment tax credit)

- defined, 127(9)

Non-qualifying country

- defined, for FAPI rules, 95(1)

Non-qualifying real property

- defined, 108(1), 110.6(1), 131(6) [all repealed]

Non-qualifying security

- calculation of capital gain on, 40(1.01)
- ceasing to be, 118.1(13)(b)
- defined, 118.1(18)
- donation of
 - credit disallowed to individual, 118.1(13)–(13.3)
 - death of donor, 118.1(15)
 - deduction disallowed to corporation, 110.1(6)
 - amalgamation, effect on donor, 87(2)(m.1)
 - windup, effect of, 88(1)(e.2), (e.61)
- exchanged for another non-qualifying security, 118.1(14)
- reserve on donation of, 40(1.01)(c)
 - disallowed in year of death, 72(1)(c)

Non-refundable credits, 118–118.95

Non-reporting Canadian financial institution

- defined
 - FATCA agreement for exchange of information with IRS Agreement, Art. 1:1(q)
 - for Canadian reporting of U.S. persons' interests in accounts, 263(1)

Non-reporting financial institution

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

Non-resident, *see also* Non-resident tax; Becoming resident in Canada; Ceasing to be resident in Canada; Former resident

- actor, *see* Actor: non-resident
- agent for, liable to withhold tax, 215(3)
- alimony/maintenance paid to, 212(1)(f) [repealed]
- allowance for investment in property in Canada, Reg. 808
- alternative re rents and timber royalties, 216
- amount owing to corporation resident in Canada, 17(1)
- amount paid to, re pre-1976 bond, etc.
 - prescribed countries, Reg. 1600
- amounts received under certain contracts, 115(2)(c.1), 115(2)(e)(v)
 - withholding tax, 153(1)(o)
- annuity payments to, 212(1)(o)
- assessment under Part XIII, 227(10)
- assuming debt for Canadian business, 76.1(2)
- bank accounts, reporting of to foreign governments, *see* Common Reporting Standard
- becoming, *see* Ceasing to be resident in Canada
- beneficiary, *see* Beneficiary: non-resident
- benefit conferred on, 246(1)(b)
- branch tax, 219
- Canadian resource property, income earned on, 115(4)
- capital cost allowance, Reg. 1102(3)
- capital dividend paid to, 212(1)(c)(ii), 212(2)(b)
- capital gains of, taxed, 115(1)(b)
 - proration re gains before May 1995, 40(9)
- capital property, change in use, 45(1)(d)
- carrying on business in Canada
 - extended meaning of, 253
 - liability for income tax, 2(3)(b)
- ceasing to be, *see* Becoming resident in Canada
- change in use (or proportions of use) of capital property, 45(1)(d)
- change in use (or proportions of use) of depreciable property
 - “gaining or producing income” from a business, 13(9)
- corporation, *see also* Foreign affiliate
 - bonds of, eligible for RRSP investment, Reg. 4900(1)(p)
 - branch tax, 219(1)
 - debt forgiveness reserve, 61.3(2)
 - deemed, where not resident due to treaty, 250(5)
 - dividend received by Canadian corporation from, 112(2)
 - electronic filing not required, Reg. 205.1(2)(b)
 - income bond/debenture, interest on, 15(4)
 - no share capital, equity interests deemed to be shares, 93.2(2)
 - required to file tax return, 150(1)(a)
 - shares of, for deferred income plans, 204“qualified investment”(h)
 - RESP qualified investment, 146.1(1)“qualified investment”(a)
 - RRSIF qualified investment, 146.3(1)“qualified investment”(a)
 - RRSP qualified investment, 146(1)“qualified investment”(a)
- credit for tax paid on emigration, 119
- debt owing to corporation resident in Canada, 17
- deductions allowed, in computing income from a source, 4(3)
- deferred profit sharing plan payments to, 212(1)(m)
- defined, 248(1)
- disposition of property by
 - Canadian resource property, certificate re, 116(5.2)

Index

- Non-resident (*cont'd*)
 - Canadian securities, 39(5)(g)
 - interest in real property etc., 216(5)
 - life insurance policy, presumption re, 116(5.4)
 - taxable Canadian property, *see* taxable Canadian property (*below*)
 - treaty-protected property, 116(5.01), (5.02)
 - where tax deferred under tax treaty, 115.1
 - dividend paid to, 212(2)
 - stop-loss rule, 40(3.7)
 - election to file return under Part I
 - certain payments, 217
 - rents and timber royalties, 216
 - restriction on deduction, 216(8)
 - emigration, *see* Ceasing to be resident in Canada
 - employed in Canada
 - liability for income tax, 2(3)(a)
 - energy conversion grants paid to, 212(1)(s)
 - entity, *see* Non-resident entity
 - estate or trust income paid to, 212(11)
 - exchanged for another non-qualifying security, 118.1(14)
 - exchanges of property, determination of gain, 44(7)
 - excluded property, defined, 116(6)
 - financial institution, *see also* Authorized foreign bank
 - beginning to use property in Canadian business, 142.6(1.2)
 - ceasing to use property in Canadian business, 142.6(1.1)
 - first home savings account payments to, 212(1)(y)
 - foreign tax credit re disposition before Oct/96, 126(2.2)
 - former resident, credit for tax paid on emigration, 119
 - home insulation grants paid to, 212(1)(s)
 - income-averaging annuity contract payments to, 212(1)(n)
 - income earned in a province, Reg. 2602
 - “income for the year”, 120(3)
 - income from ship or aircraft, exempt, 81(1)(c)
 - individual
 - computation of Part I tax, 118.94
 - required to file tax return, 150(1.1)(b)
 - tax credits, 118.94
 - insurance corporation, *see* Insurance corporation: non-resident
 - insurer, liability for additional tax on branch profits, 219(4)–(8)
 - inventory of, 10(12)–(14)
 - investor, *see* Non-resident investor
 - issuing obligation at discount, 16(2), (3)
 - loan to, by corporation, 17
 - management fees paid to, 212(1)(a)
 - moving debt from Canadian business, 76.1(1)
 - no reserve for amount not due until later year, 20(8)
 - non-arm’s length sale of shares by, 212.1
 - obligation transferred or assigned to
 - where deemed resident, 214(9)
 - ownership certificate required of, 234
 - partnership, withholding tax on payments to, 212(13.1)(b)
 - patronage dividends paid to, 212(1)(g)
 - payments to, 212(1)
 - deemed, 214(3), (3.1)
 - information returns, Reg. 202
 - pension benefits paid to, 212(1)(h)
 - pension fund, *see* Non-resident pension fund
 - persons, Reg. 805
 - excluded property, Reg. 810
 - plan for benefit of, re services rendered outside Canada, excluded from “retirement compensation arrangement”, 248(1)
 - exception re “resident’s arrangement”, 207.6(5)
 - real estate of, transfer to corporation, 85(1.1)(h), 85(1.2)
 - refund of Part XIII tax, 227(6)
 - registered education savings plan payments to, 212(1)(r)
 - registered retirement income fund payments to, 212(1)(q)
 - registered retirement savings plan payments to, 212(1)(l)
 - remuneration for office, employment or services, 115(2)(c.1), 115(2)(e)(v)
 - withholding tax, 153(1)(o)
 - rents/royalties paid to, 212(1)(d)
 - reporting accounts to CRA to pass on to foreign governments, *see* Common Reporting Standard
 - retirement compensation arrangement, purchase price of interest in, 212(1)(j)
 - retiring allowance paid to, 212(1)(j.1)
 - return may be required of, 215(4)
 - salary deferral arrangements, 6(13)
 - shareholder
 - loan to, from corporation, 15(2.2), (8), 227(6.1)
 - spousal support payments, 212(1)(f)
 - stop-loss credit, 119
 - student, 115(2)
 - supplementary unemployment plan benefits paid to, 212(1)(k)
 - TFSA taxable payments to, 212(1)(p)
 - tax, *see also* Non-resident tax
 - tax under Part I, 2(3)
 - taxable Canadian property
 - disposition of, 2(3)(c), 115(1)(b), 116
 - failure to give Minister notice, offence/penalty, 238(1)
 - prorating for gains before May 1995, 40(9)
 - purchaser liable for tax, 116(5)
 - taxable income earned in Canada, 115
 - deductions permitted, 115(1)(d)–(f)
 - taxable income of corporation earned in a province, Reg. 413
 - taxation year of, 250.1(a)
 - time, *see* Non-resident time
 - timber royalties paid to, 212(1)(e)
 - transactions not at arm’s length with, 247
 - extended reassessment period, 152(4)(b)(iii)
 - information return re, 233.1
 - penalty for failure to file, 162(10)
 - transfer pricing rules, *see* Transfer pricing (re non-residents)
 - treaty-exempt property, 116(6.1)
 - trust, *see* Trust (or estate): non-resident
 - unreasonable consideration from, 247
 - unreasonable consideration paid to, 247
 - withholding tax, 212, 215(1), 227(10), Reg. 105, *see also* Non-resident tax
 - joint and several liability, 227(8.1)
- Non-resident entity**
 - defined, 94.1(2)
 - interest in, structured for tax deferral, 94.1(1)
 - reporting of property held by, 233.2(4.1)
- Non-resident financial institution**, *see* Non-resident: financial institution
- Non-resident investor**
 - defined, 218.3(1)
- Non-resident-owned investment corporation (before 2004)**, 133
 - eliminated after 2003, 133(8)“non-resident-owned investment corporation”(g)–(i)
- Non-resident pension fund**
 - deemed not carrying on business in Canada, 115.2(2)
 - defined, re not carrying on business in Canada, 115.2(1)
- Non-resident portion (of trust)**
 - defined, 94(1)
 - excluded from deemed-resident trust’s income, 94(3)(f)(i)
- Non-resident portion trust**
 - defined, 94(3)(f)(i)
 - rules for, 94(3)(f)
- Non-resident tax**, 212–218; Reg. 800–810
 - additional tax on non-resident corporation carrying on business in Canada, 219
 - insurers, 219(4)–(8)

Index

- Non-resident tax (*cont'd*)
- advanced life deferred annuity (ALDA), payment from, 212(1)(l.1)
 - alimony, 212(1)(f)
 - annuity payments, 212(1)(o)
 - assessment under Part XIII, 227(10)
 - back-to-back loans, anti-avoidance, 212(3.1)–(3.81)
 - back-to-back royalties, anti-avoidance, 212(3.9)–(3.94)
 - Canada Pension Plan benefits, 212(1)(h)(ii) [repealed]
 - • election to file return, re, 217
 - certificate for non-resident with PE in Canada, Reg. 805.1
 - deemed dividends, 214(3)
 - deemed income, on, 214(4)
 - deemed interest, 214(6)–(14)
 - deferred profit sharing payments, 212(1)(m)
 - • election to file return re, 217
 - dividends, 212(2)
 - • deemed payment of, 212.1(1), (1.1)
 - • from foreign business corporation, 213(1)
 - eligible funeral arrangement, return of funds, 212(1)(v)
 - employee benefit plan, trust payments not subject to, 212(17)
 - employee life and health trust benefits, 212(1)(w)
 - energy conversion grant, 212(1)(s)
 - estate or trust income, 212(1)(c)
 - • exemption, 212(9), (10)
 - first home savings account, payments out of, 212(1)(y)
 - home insulation grant, 212(1)(s)
 - identification of obligations, Reg. 807
 - income and capital combined, 214(2)
 - income imputed to transferor, not taxable, 212(12)
 - informant payment, 212(1)(x)
 - insurers, Reg. 800–805.1, 2401, 2403
 - interest, 212(1)(b)
 - • government bonds, exempt, 212(1)(b)(ii)
 - • loan to wholly-owned subsidiary, 218
 - • long-term debt, exempt, 212(1)(b)(vii)
 - • on provincial bonds, 212(6)
 - • replacement obligation where corporation in financial difficulty, 212(3)
 - international organizations, prescribed, Reg. 806
 - limitation on rate, ITAR 10(6)
 - maintenance, 212(1)(f)
 - management fee, 212(1)(a)
 - • defined, 212(4)
 - motion picture films, payments for use of etc., 212(5)
 - mutual fund distributions, 218.3
 - no action for withholding, 227
 - no deductions from income, 214(1)
 - non-arm's length sale of shares by non-resident, 212.1
 - obligation transferred or assigned
 - • non-resident deemed resident, where, 214(9)
 - Part XIV, 219
 - partnership payer or payee, 212(13.1), (13.2)
 - patronage dividend, 212(1)(g)
 - payee certificate, Reg. 805.1
 - pension benefits, 212(1)(h)
 - • election to file return re, 217
 - prescribed international organizations, Reg. 806
 - refund of, 227(6)
 - registered education savings plan, payments out of, 212(1)(r)
 - registered retirement income fund, 212(1)(q)
 - registered retirement savings plan, payments out of, 212(1)(l)
 - • election to file return re, 217
 - regulations
 - • reducing amount to be deducted or withheld, 215(5)
 - • residents etc., re, 214(13)
 - rent, royalties, 212(1)(d), 212(13)
 - • alternative re rents and timber royalties, 216
 - • retiring allowances, etc., 212(1)(j.1)
 - • election to file return re, 217
 - securities in satisfaction of income debts, 214(4)
 - spousal/child support, 212(1)(f)
 - standby charges and guarantee fees, 214(15)
 - supplementary unemployment benefits, 212(1)(k)
 - • election to file return re, 217
 - TFSA, taxable payments from, 212(1)(p)
 - timber royalty, 212(1)(e)
 - • alternative re, 216
 - trust or estate income paid to, 212(1)(c)
 - • trust becoming non-resident, 214(3)(f)(i)(C)
 - withholding of, 215, Reg. 105
 - • reduction of, Reg. 809
- Non-resident time**
- defined, 94(1)
- Non-resident trust**, *see* Trust (or estate): non-resident
- Non-resident withholding tax**, *see* Non-resident tax
- Non-residential building**, *see* Eligible non-residential building
- Non-share-capital corporation**
- whether control acquired, 256(8.1)
- Non-share consideration (boot)**
- effect of mutual fund rollover, 132.2(2)(e)(ii)
 - effect on non-arm's length sale of shares, 84.1(1)(b)
 - effect on section 85 rollover, 85(1)(b)
- Non-taxable obligation, defined**, 240(1)
- Non-taxable portion (of disability assistance payment)**
- defined, 146.4(7)
- Normal reassessment period**
- defined, 152(3.1)
 - limitation on reassessments, 152(4), (5)
- Nortel Networks spin-off**, 55(3.02)
- Northern Canada**
- additional car allowance in Yukon and N.W.T., Reg. 7306(c)
 - credit for residing in, 110.7, Reg. 7303.1
 - prescribed northern zone and prescribed intermediate zone, Reg. 7303.1
 - remote work site, employment at, 6(6)
- Northern Cod Compensation and Adjustment Program**, *see also* Fishing: compensation programs
- overpayments repaid, deductible, 60(n)(v)
 - payments received under, taxable, 56(1)(a)(vi)
 - • withholding of tax at source, 153(1)(m)
- Northwest Territories**, *see also* Northern Canada
- additional \$0.04 reasonable kilometrage allowance, Reg. 7306(c)
 - *Risk Capital Investment Tax Credits Act*, corporation under
 - • prescribed assistance under, Reg. 6702(a.2)
 - • prescribed LSVCC, Reg. 6701(i)
 - • prescribed venture capital corporation, Reg. 6700(a)(xiii), 6700.2
 - • qualified investment, Reg. 4900(1)(i.12)
 - tax rates, *see* introductory pages
- Norway**, *see also* Foreign government
- stock exchange recognized, 262
- Not-for-profit organization**, *see also* Non-profit organization
- defined, Canada-U.S. Tax Treaty:Art. XXIX-A:5(d)
- Notary (in Quebec)**, *see* Lawyer
- Notch provision (medical expenses)**, 118.2(1)D
- Note**, *see* Promissory note
- Note-taking services**
- disability supports deduction, 64(a)A(ii)F
 - medical expense credit, 118.2(2)(l.41)
- Notice of assessment**, *see* Assessment: notice of
- Notice of determination**, 152(1.2), *see also* Determination
- date of, 244(15)

Index

Notice of determination (*cont'd*)

- loss carryforwards, 152(1.1)
- partnership income or loss, 152(1.5)
- objection to, 165(1.15)
- presumption re mailing date, 248(14)

Notice of intent

- to revoke LSVCC, 204.81(7)
- to revoke PRPP, 147.5(24)–(26)
- defined, 147.5(24)
- to revoke RESP, 146.1(12.1), (12.2)
- appeal from, 172(3)(e.1)
- defined, 146.1(12.1)
- to revoke RPP, 147.1(11), (12)

Notice of objection, 165, *see also* Objection

- appeal following, whether new issues can be raised, 169(2.1)
- deadline, 165(1)
- determination of partnership income or loss, 165(1.15)
- extension of time to file
 - by Minister, 166.1
 - by Tax Court, 166.2
- form, 165(1), (2)
- large corporation, issues to be specified, 165(1.11)
- limitation on grounds for objection, 165(1.1)
- service, 165(2), (6)

Notice of revocation (of RESP)

- defined, 146.1(12.2)
- effect of, 146.1(13)

Notifiable transaction

- defined, 237.4(1)
- designation of specific transactions, 237.4(3)
- information return required, 237.4(4)
- exception for clerical or secretarial services, 237.4(8)
- exception for secondary financial services, 237.4(6), (7)
- filing by employer or partnership satisfies employee's or partner's obligation, 237.4(5), (14)
- filing deadline, 237.4(9)
- penalty for failure to file, 237.4(12)
- reassessment deadline 3 years after filed, 152(4)(b.6)
- reporting one transaction in series is sufficient, 237.4(10)

Nova Scotia, *see also* Cape Breton; Province

- Community Economic Development Corporation, qualified investment for deferred income plans, Reg. 4900(1)(i.11)
- *Equity Tax Credit Act*, corporation under, qualified investment, Reg. 4900(1)(i.11)
- labour-sponsored venture capital corporation of
 - prescribed, Reg. 6700(a)(iii), (xiv)
- offshore area
 - amount taxable earned in, Reg. 414, 415
 - included in "province", 124(4)"province"
 - meaning, 248(1)
- Offshore Petroleum Resources Accord, communication of information for, 241(4)(d)(vi)
- prescribed area, for electrical energy or steam processing, 127(9)"qualified property"(c.1)
- prescribed designated region, 127(9)"specified percentage"(a)(vi), Reg. 4607
- prescribed stock savings plan, Reg. 6705(c)
- qualified property acquired for use in, 127(9)"specified percentage"(a), (e)
- tax rates, *see* introductory pages
- unlimited liability company, 248(1)"corporation" (Notes)
- treaty benefit denial, Canada-U.S. Tax Treaty:Art. IV:7

Novartis/Alcon spinoff, Reg. 5600(m)

Nuclear Fuel Waste Act

- trust required by, no tax on, 149(1)(z.2)

Numbers, *see also* Dollar amounts in legislation and regulations

- singular includes plural, *Interpretation Act* s. 33(2)

Nun

- income of, not taxed, 110(2)

Nurse

- defined, 118.4(2)

Nurse practitioner

- can certify impairment for disability credit, 118.3(1)(a.2), (a.3)
- defined, 118.4(2)

Nursery school, *see* Child care expenses

Nursing home

- cost of care, as medical expense, 118.2(2)(b), (d)

O

OAS, *see* Old Age Security Act benefits

OECD, *see* Organisation for Economic Cooperation and Development

OETC, *see* Overseas employment tax credit

OIFP, *see* Offshore investment fund: property

OSFI risk-weighting guidelines

- defined, 248(1)

Oaths

- administration of, 220(5), *Interpretation Act* s. 19
- defined, *Interpretation Act* s. 35(1)

Objection, 165, *see also* Appeal; Notice of objection

- assessment or reassessment, to, 165(1)
- books and records, 230(6)
- charity penalties or suspension of receipting privileges, to, 189(8)
- effect of Minister's filing notice, 165(4)
- expense of making, deductible, 60(o)
- extension of time for filing, 166.1, 166.2
- Minister's duty on, 165(3)
- notice of, 165(1)
- Part II.2 tax, 183.4(2)
- Part IV.1 tax, 187.6
- Part VI.1 tax, 191.4(2)
- Part VI.2 tax, 191.6
- Part XI.01, 207.07(3)
- Part XI.4 tax, 207.8(5)
- Part XII.2 tax, 210.2(7)
- Part XII.3 tax, 211.5
- Part XII.4 tax, 211.6(5)
- Part XII.5 tax, 211.82
- partnership income or loss, 165(1.15)
- repayment on, 164(1.1)
- restriction on collection action while underway, 225.1
- second notice not required after reassessment, 165(7)
- service of notice of, 165(2)
- waiver of right to object, 165(1.2), 169(2.2)

Obligation, *see also* Bond; Debt; Debt obligation

- assignment of
 - non-resident tax, 214(14)
 - where non-resident deemed resident, 214(9)
- defined, ITAR 26(12)"obligation"
- discount on, deduction for, 20(1)(f)
- identification of, Reg. 807
- issued at discount by tax-exempt person, non-resident, or government body, 16(2), (3)
- parked, 80.01(7)
- predecessor corporation, of, 87(6), (7)
- principal amount of
 - defined, 248(1)
 - limitation on deductibility, 18(1)(f)
- purchase of, by issuer, 39(3)
- received on amalgamation, ITAR 26(23)
- sale of
 - non-resident tax, 214(7), (7.1)
- satisfaction of, deemed not to be disposition, 49.1

- Obligation (*cont'd*)
 - specified, 80.01(6)
 - taxable and non-taxable, defined, 240(1)
- Obsolescence**
 - allowance re, limitation on deductibility, 18(1)(b)
- Occupational therapist**
 - certification of impairment
 - for disability credit, 118.3(1)(a.2)(iv)
 - defined, 118.4(2)
 - therapy qualifying for medical expense credit, 118.2(2)(1.9)
- Offences, 238(1), 239**
 - attempted evasion, 239(1)
 - calculation of income from criminal activity, 9(1) (Notes)
 - compliance orders, on conviction of, 238(2)
 - corporation officers, 242
 - court has no power to decrease punishment for, 243
 - credits, false statements, 239(1.1)
 - disclosure of confidential information, 239(2.2)
 - electronic sales suppression software, 239.1, *see also* Zapper software (or hardware)
 - failure
 - file return, 238(1)
 - keep records, 238(1)
 - keep tax deductions separate, 238(1)
 - permit investigation, 238(1)
 - withhold tax deductions, 238(1)
 - false statements, 239
 - fines, no deduction for, 18(1)(t)
 - minimum fines, 243
 - non-resident failing to give notice under s. 116(3), 238(1)
 - penalties for, *see* Penalty
 - refunds, false statements, 239(1.1)
 - RESP contributions, 146.1(2)(g.3)
 - sales suppression software, 239.1, *see also* Zapper software (or hardware)
 - saving provision, 238(3)
 - secrecy violation, 239(2.2)
 - serious, CRA may disclose information to police, 241(9.5)
 - Social Insurance Number, re, 239(2.3)
 - two or more in one complaint, 244(2)
 - zapper software, 239.1, *see also* Zapper software (or hardware)
- Office, defined, 248(1)**
- Office at home, *see* Work space in home**
- Office de professions du Québec**
 - dues to, deductible, 8(1)(i)(vii)
- Office or employment**
 - benefits from, includable in income, 6(1)
 - in home
 - conditions for deductibility, 18(12)
 - income from, 5(1)
 - deductions, 8
 - inclusions, 6
 - share options, 7
 - limitation on deductions, 8(2)
 - loss from, 5(2)
 - payment for loss of, *see* Retiring allowance
 - share option benefits, 7
- Office rent**
 - paid by employee, deduction, 8(1)(i)(ii)
 - certificate of employer, 8(10)
- Officer**
 - administering and enforcing Act, 220(2)
 - bribery of, non-deductible, 67.5
 - corporation, of
 - execution of documents by, 236
 - guilty of corporation's offence, 242
 - defined (under "office"), 248(1)
- Official**
 - defined, re communication of taxpayer information, 241(10)
 - CRA, powers and duties delegated to, 220(2.01), Reg. 900
- Official copy of *Income Tax Act*, 2(1) (Notes)**
- Official receipt**
 - defined
 - for political contributions, Reg. 2002(1)
 - for donations and gifts, Reg. 3500
- Official receipt form**
 - defined
 - for political contributions, Reg. 2002(1)
 - for donations and gifts, Reg. 3500
- Off-road electric or hydrogen vehicle**
 - capital cost allowance, Reg. Sch. II:Cl. 56
- Offset interest**
 - against instalments, 161(2.2)
 - arrears against refund interest, 161.1
- Offsetting position**
 - defined, for straddle-transaction rules, 18(17), 18(21)(c)
 - no income deferral allowed, 18(19)
- Offshore assets**
 - criminal charges, 239(1) (Notes)
 - disclosure of, to CRA, 233.3
 - payments to informants for reporting to CRA, *see* Informant payments
- Offshore corporation, *see* Foreign affiliate; Non-resident**
- Offshore drilling vessels**
 - capital cost allowance
 - additional, Reg. 1100(1)(va)
 - separate classes, Reg. 1101(2b)
- Offshore investment fund, 94.1**
 - property
 - cost base, additions to, 53(1)(m)
 - designated cost, 94.1(2)
 - prescribed, Reg. 6900
- Offshore region**
 - prescribed, for investment tax credit, Reg. 4609
- Offshore regulated bank**
 - application of FAPI, 95(1)"investment business"(a)(i), 95(2.11)
- Offshore Tax Informant Program, *see* Informant payments**
- Offshore trust, *see also* Trust (or estate): non-resident**
 - distribution from, reporting requirement, 233.5
 - taxation of, where Canadian beneficiary, 94–94.2
 - transfer of property to, reporting requirement, 233.2
- Off-the-shelf seismic data, *see* Seismic testing**
- Oil and gas, *see* Canadian oil and gas property expense; Flow-through shares; Petroleum/natural gas; Resource expenses**
- Oil burner mechanic**
 - apprenticeship job creation credit, 127(9)"investment tax credit"
- Oil or gas field**
 - unitized, *see* Unitized oil or gas field in Canada
- Oil or gas well**
 - allowances, 65, Reg. 1207
 - additional, Reg. 1208
 - certificate re, ceasing to be valid, 66.1(10)
 - defined, 248(1)
- Oil or gas well equipment**
 - capital cost allowance, Reg. Sch. II:Cl. 10(j), Sch. II:Cl. 41
- Oil Pollution Compensation Fund**
 - trust under, 94(1)"exempt foreign trust"(c)(iv)
- Oil refinery**
 - capital cost allowance, Reg. Sch. II:Cl. 10(u), Sch. II:Cl. 41

Index

Oil sands

- additional allowance, Reg. 1100(1)(y), (ya)
- included in definition of “mineral”, 248(1)
- property, *see* Oil sands property

Oil sands mine development project

- defined, 66.1(6)

Oil sands project

- defined, Reg. 1104(2)

Oil sands property

- capital cost allowance, Reg. 1100(1)(a)(xxvii.1), 1100(1)(y.1), 1100(1)(ya.1), Sch. II:Cl. 41, 41.1
- effect of transfer due to reorganization, Reg. 1102(14.11)
- defined, Reg. 1104(2)
- separate class, Reg. 1101(4e), (4f)

Oil shale, included in definition of “mineral”, 248(1)

Oil shale deposit, exploration for

- excluded from CEE, 66.1(6)“Canadian exploration expense”(g), (g.2)
- excluded from CRP, 66(15)“Canadian resource property”(b)(ii), (e), (f)

Oil Substitution Program, *see* Energy: conversion grant

Okalta Oils Ltd. case overruled, 152(1.1)

Old Age Security Act benefits

- “clawback” tax on, 180.2 (Part I.2)
- deduction from income for, 60(w)
- emigration of taxpayer, no deemed disposition, 128.1(10)“excluded right or interest”(g)(ii)
- excluded from pension income credit, 118(8)(a)
- included in income, 56(1)(a)(i)
- non-resident withholding tax, 212(1)(h)
- U.S. residents, Canada-U.S. Tax Treaty:Art. XVIII:5
- reduction in RRSP annuity to reflect, 146(3)(b)(ii)
- repayment of, deduction for, 60(n)(i)
- withholding of benefits to cover clawback tax, 180.2(3), (4)

“Old law” defined, ITAR 12

Old person, *see* Age

Older Worker Adjustment, Program for

- income assistance taxable, 56(1)(a)(vi), Reg. 5502(b)
- repayment of benefits, deduction, 60(n)(v)
- source withholding, 153(1)(m), Reg. 5502(b)

Olsen TCC case overruled, 186(7)

Olympic Winter Games 2010

- income of non-residents exempt, 115(2.3)
- no withholding of tax at source, 153(1)(a), (g)
- payments to International Olympic Committee exempt, 212(17.1)

Online newspaper credit, 118.02

Online notice, *see* Electronic notice

Ontario, *see also* Province

- Community Economic Development bonds, eligible for RRSP investment, Reg. 4900(1)(i.1)
- community small businesses, investment by LSVCCs, Reg. 4801.02
- Electricity Support Program, payments exempt, 81(1)(g.6)
- labour-sponsored venture capital corporation of
- prescribed, Reg. 6700(a)(ii), (xi), Reg. 6700.2
- northern, *see* Northern Canada
- R&D super-allowance, 127(9)“super-allowance benefit amount”
- tax rates, *see* introductory pages

Onus, *see* Burden of proof

Operating costs of automobile, *see* Automobile: operating costs

Operational mission, *see* Deployed operational mission

Optic cable, *see* Fibre optic cable

Optical scanner, for blind person

- medical expense credit, Reg. 5700(1)

- disability supports deduction, 64(a)A(ii)(D)

Option, *see also* Stock option

- agreement, *see* Option agreement
- defined
- for rule disallowing deductions or credits for option or share issuance, 143.3(1)
- disposition of, 13(5.3)
- exchanged, rules, 7(1.4)
- exercised, 49(3), (4), (5)
- overpayment of tax as consequence of, 164(5), (5.1)
- expiry of, 49(2)
- amalgamation, 87(2)(o)
- granted to charity, 110.1(10)–(13), 118.1(21)–(24)
- granting of, disposition of property, 49(1)
- included in “taxable Canadian property”, 248(1)“taxable Canadian property”(f)
- qualified investment for RRSP etc., Reg. 4900(1)(e), (e.1)
- received on amalgamation, ITAR 26(22)
- stock, *see* Stock option
- to acquire, exercised, 49(3), (4)
- effect of capital gains exemption, 49(3.2)
- to acquire interest in partnership or trust, reductions in ACB flowed through, 49(3.01)
- to acquire mutual fund trust units, *see* Stock option
- to acquire shares
- by employee, *see* Stock option
- deemed to be share for insurance demutualization, 139.1(1)
- predecessor corporation, of, 87(5)
- reductions in ACB flowed into ACB of shares, 49(3.01)
- to acquire specified property, exercise of, 49(3.01)
- to dispose, exercised, 49(3.1), (4)

Option agreement

- deemed to be eligible derivative subject to mark-to-market election, 10.1(4)
- excluded from inventory writedown, 10(15), 18(1)(x)
- straddle transaction restrictions, 18(17)“position”(a)(vi), 18(9)

Optometrist

- certification of impairment
- for disability credit, 118.3(1)(a.2)(i)
- defined, 118.4(2)

Orckit Communications spinoff, Reg. 5600(b)

Ordering

- charitable donations
- in order of year of contributions, 110.1(1.1)(b), 118.1(2.1)
- charity loanbacks, 118.1(17)
- credits of an individual, 118.92
- debt forgiveness rules application, 80(2)(c)
- debt obligations settled simultaneously, 80(2)(i)
- deductions
- eligible capital property, for capital gains exemption, 110.6(17)
- in computing taxable income, 111.1
- designation of insurance properties, Reg. 2401(3)
- disposition of depreciable property on death, 70(14)
- disposition of identical shares for capital gains exemption, 110.6(14)(a)
- disposition of securities acquired under employee option agreement, 7(1.3), (1.31)
- dividends, out of eligible or non-eligible RDTOH, 129(1)(a)(ii)
- dividends, simultaneous, 89(3)
- foreign affiliate surplus distributions, Reg. 5901
- identical options, exercise of, 7(12)
- internal reorganization rules, 51(4), 86(3)
- mutual fund non-resident withholding tax payments, 218.3(7)
- mutual fund qualifying exchange, 132.2(1)(e)
- non-portfolio dividends distributed last from SIFT trust, 104(6)(b)B(ii)
- partnership distributions tax calculation, 197(3)
- registered investment registration, 204.4(7)

- Ordering (*cont'd*)
- SIFT trust non-portfolio earnings, 104(6)(b)B(ii)
 - spousal RRIF attribution, 146.3(5.3)
 - spousal RRSP attribution, 146(8.5)
 - synthetic equity arrangement, identical properties, 112(10)
 - transfer of depreciable property with pregnant loss, 13(21.2)(e)(ii)
 - transfer pricing rules, 247(2.1)
- Ordinarily resident**, 250(3)
- Ordinary taxation year**
- defined, for FAPI stub-period rules, 91(1.1)(a)
- Ore**
- defined
 - for capital cost allowance, Reg. 1104(2)
 - for resource allowance, Reg. 1206(1)
 - processing of, 125.1(3)“manufacturing or processing”, Reg. 5203, Reg. Sch. II:Cl. 10(k)
 - tar sands, *see* Tar sands ore
- Organ transplant**
- expenses of, tax credit for, 118.2(2)(1.1)
- Organic assets**
- defined, for FAPI of banks, 95(2.43)
- Organisation for Economic Cooperation and Development**
- BEPS rules, *see* Base erosion and profit shifting, anti-avoidance rules
 - Common Reporting Standard, 270–281
 - digital platform reporting rules, 282–295
 - transfer pricing guidelines, 247
- Original acquisition**
- defined, 127.4(1), 204.8(1), 211.7(1)
- Original amount**
- defined, re royalty reimbursements, 80.2(1)(a)
- Original corporate holdings percentage**
- defined, for private foundations, 149.1(1)
- Original editorial content**
- defined, 19.01(1)
- Original owner (of resource property)**
- defined, 66(15)
 - for resource allowance, Reg. 1206(1)
 - reduction of Canadian resource expenses, 66.7(12), (12.1)
 - reduction of foreign resource expenses, 66.7(13)
 - successor corporation rules, 66.7
- Original right, defined**, ITAR 20(3)(b)
- Orthopaedic shoes/boots**
- medical expense, Reg. 5700(e)
- Other recipient of a gift**
- defined, Reg. 3500
- Outdoor advertising structures**
- capital cost allowance, Reg. Sch. II:Cl. 8(l), Sch. II:Cl. 11(b)
 - separate class, election, Reg. 1101(5l)
- Outlays and expenses**
- prescribed, for air quality improvement credit, Reg. 9700
- Outstanding amount**
- defined, for corporation attribution rules, 74.4(3)
- “Outstanding debts to specified non-residents”**
- defined, 18(5)
 - no deduction where debt-equity ratio exceeds 3:1, 18(4)
- Overburden removal cost, designated**
- capital cost allowance, Reg. Sch. II:Cl. 12(q)
- Overcontribution to RRSP**
- tax on, 204.1(2.1), 204.2(1.1)
- Overhead expenses**
- R&D-related, 127(9)“qualified expenditure” Reg. 2900(4)–(10)
- Overpayment amount**
- defined, for corporate interest offset, 161.1(1)
- Overpayment of benefits, deductible when repaid**, 60(n)
- Overpayment of tax**
- deemed
 - Canada Child Benefit, 122.61(1)
 - GST credit, 122.5(3)
 - defined, 164(7)
 - refund of, 164
- Overseas Canadian Forces school staff**
- defined, 248(1)
 - members deemed resident in Canada, 250(1)(d.1), 250(2)
 - option of filing as resident, 250(1)(d.1)
 - prescribed order, Reg. 6600
- Overseas employment tax credit**, 122.3
- eliminated as of 2016, 122.3(1.01)(b), 122.3(1.02)(b)
- Over-the-counter stocks**
- qualified for deferred income plans before 2002, Reg. 4900(1)(s) [repealed]
- Ovum**
- cost of, medical expense credit, 118.2(2)(v)
- Owner**
- original, of resource properties, defined, 66(15)“original owner”
 - predecessor, of resource property, defined, 66(15)“predecessor owner”
- Owner-occupied home**
- defined, for Home Buyers’ Plan withholding exemption, Reg. 104(3.1)
- Ownership**
- certificates of, 234, Reg. 207
 - penalties for offences re, 162(4)
 - change of, certificates, Reg. 502
 - rights, *see* Ownership rights
- Ownership rights**
- defined, for insurance demutualization, 139.1(1)
 - rollover to shares of insurance corporation, 139.1(4)(a), (d)
- Oxygen, medical expense credit**, 118.2(2)(k)
- Oxygen concentrator, medical expense credit**, 118.2(2)(i)
- P**
- PA**, *see* Pension adjustment
- PA offset**
- defined, Reg. 8300(1)
- PAR**, *see* Pension adjustment reversal
- PATY (Particular affiliate’s taxation year)**
- defined, Reg. 5907(1.6)(a)
- PBC**, *see* Principal-business corporation (exploration and development); Principal-business corporation (real property)
- PDI**, *see* Participating debt interest
- PE**, *see* Permanent establishment
- PFIC**, *see* Pension fund investment corporation
- PI**, *see* Prohibited investment
- PIE**, *see* Portfolio investment entity
- PIK (Payment in Kind) dividend**, *see* Stock dividend
- PLOI**, *see* Pertinent loan or indebtedness
- PPME**, *see* Pre-production mining expenditure
- PR**, *see* Principal residence
- PRPP**, *see* Pooled registered pension plan (PRPP)
- PSB**, *see* Personal services business
- PSPA**, *see* Past service pension adjustment
- PSPA withdrawals**
- defined, Reg. 8307(5)
- PUC**, *see* Paid-up capital
- Packaging material**
- deemed to be inventory, 10(5)
 - valuation of, 10(4)

Index

Padmore case overruled, Income Tax Conventions Interpretation Act s. 6.2

Page turner

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

Paid-up capital

- amalgamation, on, 87(3), (3.1)
- computation of
 - additions to, 84.1(3)
 - after designation of amount re shares, 192(4.1), 194(4.2)
 - after exchange of convertible property, 51(3)
 - after internal reorganization, 86(2.1)
 - after rollover of property to corporation, 85(2.1)
 - after share-for-share exchange, 85.1(2.1)
 - Canadian Wheat Board, 135.2(3)(c)
 - corporation becoming resident in Canada, 128.1(2), (3)
 - insurance corporation following demutualization, 139.1(6)
 - holding corporation, 139.1(7)
 - on transfer of insurance business, 138(11.7)
- contributed surplus converted into, no dividend deemed, 84(1)(c.1)–(c.3)
- cooperative corporation, of, 89(1)“paid-up capital”(b)
- credit union, of, 89(1)“paid-up capital”(b)
- defined, 89(1), 248(1)
- flow-through shares, 66.3(4)
- foreign affiliate dumping, adjustments to, 212.3(2)(b), 212.3(7)–(9)
- emigrating corporation, 219.1(1), (2)
- PUC reinstatement, 212.3(9)
- emigrating corporation, 219.1(3), (4)
- increase in, 84(1), 84(5)(d)
- mutual fund corporation, by, not deemed dividend, 131(4)
- non-resident shareholder, 212.1
- reduction of, deemed a dividend, 84(4), (4.1)
- stripping, 84.1, 212.1

Paid-up insurance, deduction for premiums, 18(9.01)

Paid-up premium

- defined, Reg. 2700(1)

Painter and decorator

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

Pandemic, see COVID-19

Panko case overruled, 239(3)

Paralympic Winter Games 2010, see Olympic Winter Games 2010

Parent (corporation)

- continuation of wound-up subsidiary, 88(1.5)
- defined, 88(1)
- incorporated after end of subsidiary’s year
- computation of income and tax payable, 88(1.3)

Parent (human)

- compensation for child killed or missing due to crime
 - included in income, 56(1)(a.3)
 - repayment of, deductible, 60(v)
- tax withheld at source, 153(1)(d.2), Reg. 100(1)“remuneration”(g.1)
- dependent, 118(6)(b)
- extended meaning, 252(2)

Parental leave

- qualifying period for pension earnings
 - Reg. 8507(3)

Parity/advisory committee

- dues paid by employee, deduction, 8(1)(i)(vi)

Parked obligation (debt parking)

- deemed settled, 80.01(8)(a)
- defined, 80.01(7)

Parking

- automobile or other vehicle
 - excluded from benefit for operating costs and standby charge, 6(1.1)
 - taxable benefit, 6(1)(a), 6(1.1)
 - exception for disabled employee, 6(16)
- debt, *see* Debt parking

Parking area

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

Parliament, see also Government

- defined, *Interpretation Act* 35(1)
- member of, *see* Member: Parliament

Parson, see Clergy

Part I.2 tax (Old Age Security clawback)

- imposed, 180.2(2)
- instalments required, 156.1(1)“net tax owing”A

Part II.2 tax (stock buybacks)

- imposed, 183.3(2)
- return required, 184.4(1)
- rules for administration, 183.4(2)

Part IV tax

- imposed, 186(1)
- late assessment allowed, 152(4.31)
- refund of, 129(1)

Part VI tax

- imposed, 190.1(1)

Part VI.1 tax

- deduction from taxable income re, 110(1)(k)
- liability for, transferred on amalgamation, 87(2)(ss)
- payment of, 157(1)

Part VI.2 tax, 191.5

- amalgamation, effect of, 87(2)(xx)

Part X.5 tax (RESP accumulated income payments)

- imposed, 204.94(2)
- instalments required, 156.1(1)“net tax owing”A

Part XI.4 tax (excess EPSP amounts)

- imposed, 207.8(2)
- instalments required, 156.1(1)“net tax owing”A

Part XI.5 tax (ELHT owning share or debt of participating employer)

- imposed, 207.9(2)

Part XII.2 tax, 210.2, 210.3

- credit for, 210.2(3)
- included in beneficiary’s income, 104(31)
- deduction for, 104(30)

Part XII.6 tax

- deductible, 20(1)(nn)

Part-time attendant

- deduction from income, 64(a)A(ii)(J)
- medical expense credit, 118.2(2)(b.1)

Part-year resident, 114

- cash method of computing income, on, 28(4)
- farmer/fisherman, 28(4)
- foreign tax credit, 126(2.2), (3)
- “income for the year”, 120(3)
- tax credits, 118.91

Parthenon Investments case overruled, 256(6.1)

Partial debt obligation

- treated the same as entire obligation, 248(27)

Partial dependency, 118.3(3)

Partial disposition

- cost base of property remaining, 53(2)(d)
- specified debt obligation, 142.4(9)

Partial public health restriction

- defined, Reg. 8901.2(0.1)
- qualifying, *see* Qualifying partial public health restriction

Participant (re butterfly transactions)

- defined, 55(1)“permitted exchange”(b)
- specified debt obligation, 142.4(9)

Participate

- defined, for third-party penalty, 163.2(1)

Participating debt interest

- defined, 212(3)
- subject to non-resident withholding tax, 212(1)(b)(ii)
- treated as equity for SIFT rules, 122.1(1)“equity”(d)(ii)

Participating employer

- deferred profit sharing plan, 147(1.1)
- of employee life and health trust, defined, 207.9(1)
- pooled registered pension plan, 147.5(1)
- registered pension plan, 147.1(1), Reg. 8308(7)

Participating farmer (in Canadian Wheat Board Farmers' Trust)

- acquisition of eligible unit of trust by, 135.2(5)
- death of, 135.2(6), (8)
- defined, 135.2(1)
- disposition of trust unit by, 135.2(9)

Participating jurisdiction

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

Participating jurisdiction financial institution

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

Participating life insurance policy

- defined, 138(12), 211(1), Reg. 1408(1)

Participating percentage

- defined, for foreign accrual property income, 95(1)

Participation certificate

- no interest payable on tax due, 161(5)

Participation period

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

Partition of property

- rules, 248(20)–(23)
- • disproportionate partition, 248(20)
- • proportionate partition, 248(21)

Partner, *see also* Partnership

- active, application of debt forgiveness rules, 80(1)“forgiven amount”B(k)
- agreement by, validity, 96(3)
- automobile provided to
- • amount included in income, 12(1)(y)
- becoming resident in Canada, 96(8)
- contribution of property to partnership, 97(1)
- debt forgiveness rules, application where partnership issued debt obligation, 80(15)
- debt owing by, where treated as partnership debt, 80(2)(n)
- deceased
- • value of rights or things to date of death, 53(1)(e)(v)
- deemed, for certain purposes, 248(13)
- depreciable property acquired with government assistance, 13(7.2)
- election by, *see* Partnership: election by members
- election re fiscal period of terminated partnership, 99(2)–(4)
- election to renounce investment tax credit, 127(8.4)
- inducement payments or reimbursement received by, 12(2.1)
- limited, *see* Limited partner
- non-resident
- • creates non-Canadian partnership, 102(1)
- • payments to, withholding tax, 212(13.1)(b)
- notice to, 244(20)

- objection to determination of partnership's income or loss, 165(1.15)
- obligation to pay interest re land purchase, 18(2.1)
- passive, *see* Limited partner; Specified member (of partnership)
- retiring, allocation of share of income to, 96(1.1)
- • deduction, 96(1.3)
- • deemed carrying on business in Canada, 96(1.6)
- • right to share in income
- • • deemed not capital property, 96(1.4)
- return on death of, 150(4)
- rules for computing income etc., 96(1)
- share of exploration and development expense, 66.1(7), 66.2(6), (7)
- tax matters, designation by partnership, 165(1.15)

Partner jurisdiction

- defined, for digital platform operator reporting rules, 282(1)

Partnership, *see also* Limited partnership; Partner; Partnership interest

- accrued interest income, 12(3)
- “acquisition cost”, ITAR 20(4)“acquisition cost”
- acquisition of foreign affiliate from, 91(7)
- agreement by members, validity, 96(3)
- agreement to share income
- • in unreasonable proportions, 103(1.1)
- • to avoid tax, 103(1)
- allocation to retiring partner, 96(1.1)
- • deduction, 96(1.3)
- annuity contract, interest in, 12.2
- assumptions, 96(2)
- business of, continued as sole proprietorship, 98(5)
- Canadian, defined, 102(1)
- Canadian development expenses of, election to exclude, 66.2(5)“Canadian development expense”(f)
- Canadian oil and gas property expenses of, election to exclude, 66.4(5)“Canadian oil and gas property expense”(b)
- Canadian partnership, defined, 102(1)
- Canadian securities owned by, 39(4.1)
- capital cost allowance, Reg. 1102(1a)
- carbon capture investment tax credit, 127.44(10)
- ceasing to exist, 98
- • continuation of, by another partnership, 98.1(2)
- • continued by new partnership, 98(6)
- • continued by proprietor, 98(5)
- • deemed proceeds of disposition, 98(2)
- • disposition of property, 98(1)
- • property transferred to corporation, 85(3)
- • rules applicable, 98(3), (4)
- charitable donations, *see* gifts made by (below)
- common-law, *see* Common-law partner
- continuation
- • as new partnership, 98(6)
- • by another partnership, 98.1(2)
- • by proprietor, 98(5)
- contribution of property to, 97
- • capital cost to partner exceeds proceeds, where, 97(4)
- • majority interest partner, by, 40(3.3), (3.4)
- corporate
- • gross revenue from active businesses, 125.1(4)
- • small business deduction, 125(6)
- • • “specified partnership income”, 125(7)
- • • “specified partnership loss”, 125(7)
- corporation as member of
- • inclusion of stub period income, 34.2(2)
- corporation deemed member, 125(6.1)
- death of partner, return, 150(4)
- debt obligation issued by, 80(13)E(a), (14)(b), (15), (18)
- deemed person for affiliated persons definition, 251.1(4)(b)
- deemed person for debt forgiveness rules, 80(1), 80.01(1)

Index

- Partnership (*cont'd*)
- deemed person for flow-through share provisions, 66(16)
 - deemed person for Part IV.1 tax, 187.4(c)
 - deemed person for scientific research tax credit rules, 127.3(7)
 - deemed person for seizure of property by creditor, 79(1)“person”, 79.1(1)“person”
 - deemed person for tax on carved-out property, 209(6)
 - deemed person for tax shelter identification rules, 237.1(1)
 - deemed taxpayer for tax shelter investment cost rules, 143.2(1)“taxpayer”
 - deemed person for withholding tax obligations, 227(5.2), (15)
 - defined, nowhere (*see case law*)
 - depreciable property, ITAR 20(3), (5)
 - determination of income or loss, 152(1.4)–(1.8)
 - objection to determination, 165(1.15)
 - distributions tax, 197, *see* SIFT partnership
 - distributions, tax on, *see* SIFT partnership
 - dividend received from foreign affiliate, 93.1(2)
 - from pre-acquisition surplus, 92(4)–(6)
 - election by members
 - date to be made, 96(4)
 - late-filed, 96(5)
 - penalty, 96(6), (7)
 - special cases, 96(5.1)
 - re property transferred, 97(2)
 - certain windups excluded, 97(3)
 - validity, 96(3)
 - exempt, for resource allowance claims, Reg. 1206(1)
 - exempt persons, anti-avoidance rule, 96(8)
 - family farm or fishing, *see* Family farm or fishing corporation/partnership
 - farming business of
 - disposition of land used in, 101
 - financial institution, 142.2(1)“financial institution”(b)
 - fiscal period of, 249.1(1)(b)(ii), (c)
 - election to align year-end with corporate partners, 249.1(8)–(11)
 - foreign accrual property income of, 93.1(5), (6)
 - foreign, partner becoming subject to Canadian tax, 96(8)
 - foreign resource property disposition, 59(1.1)
 - fuel tax rebate of, 111(11)
 - gains and losses, determination of, 96(1.7)
 - gifts made by
 - corporation’s share, 110.1(4)
 - individual’s share, 118.1(8)
 - includes another partnership that is a member, 102(2)
 - income of, 12(1)(l), 96(1)
 - determination by CRA, 152(1.4)–(1.8)
 - income splitting, 103
 - minimum tax applicable to partner, 127.52(2)
 - information return, Reg. 229
 - early disclosure for public partnership, Reg. 229.1
 - failure to make, 162(7.1), (8), (8.1)
 - foreign-based information, 233.2–233.5
 - demand for, 233(2)
 - interest accrued, 12(3)
 - interest in, *see* Partnership interest
 - interest on debt relating to acquisition of land, 18(3)“interest on debt relating to the acquisition of land”(b)
 - investing in residential property or Canadian film
 - capital cost allowance limitation, 127.52(2)
 - investment tax credit, allocation to partners, 127(8)–(8.5)
 - carbon capture (CCUS) credit, 127.44(10)
 - non-limited partners, 127(8.3)
 - life insurance policy, interest in, 12.2
 - limited, *see* Limited partnership
 - limited liability, *see* Limited liability partnership
 - look-through rules, *see* Tiers of partnerships
 - loss of, minimum tax applicable to partner, 127.52(2)
 - majority interest partner, 248(1)
 - manufacturing etc., profits, Reg. 5204
 - member, *see* Partner
 - name, reference to on documents, 244(20)(a)
 - new, continuing predecessor partnership, 98(6)
 - non-Canadian
 - withholding tax on payments to, 212(13.1)(b)
 - non-existent
 - extended deadline for assessment of non-partners, 152(1.8)
 - non-resident controlled
 - corporate member’s specified income deemed nil, 125(6.2)
 - deemed, 125(6.3)
 - notice to, 244(20)
 - Part IV.1 tax, 187.4
 - Part XIII tax, application of, 212(13.1), (13.2)
 - partner, *see* Partner
 - “percentage of member”, ITAR 20(4)“percentage”
 - personal-use property of, 46(4)
 - professional, *see* Professional partnership
 - property
 - right to receive
 - adjusted cost base, 53(2)(o)
 - public, *see* Public partnership; SIFT partnership
 - publicly traded, tax on distributions, *see* SIFT partnership
 - qualifying Canadian, *see* Qualifying Canadian partnership
 - reference to, constitutes reference to partners, 244(20)
 - renounced resource expenses, return to be filed re, 66(12.69)
 - late filing, 66(12.74), (12.75)
 - research and development expenses, no carryforward, 96(1)(e.1)
 - resident of, *Income Tax Conventions Interpretation Act* s. 6.2
 - residual interest in, 98.1(1)
 - resource expenditures, by members, 66(18)
 - allocation of assistance, 66.1(7), 66.2(6), (7), 66.4(6), (7)
 - resource expenses of
 - deemed made by partners, 66(18)
 - election by partner to exclude, 66.2(5)“Canadian development expense”(f), 66.4(5)“Canadian oil and gas property expense”(b)
 - not claimed at partnership level, 96(1)(d), 66.1(7), 66.2(6), (7), 66.4(6), (7)
 - renounced, 66(12.69), (12.74), (12.75)
 - resource expenses renounced to
 - non-arm’s length relationship deemed, 66(17)
 - return, *see* information return (*above*)
 - right to share in income
 - disposition of, 96(1.2)
 - death of taxpayer, on, 96(1.5)
 - deduction, 96(1.3)
 - rules for computing income etc., 96(1)
 - rollover to, 97(2)
 - scientific research tax credit, 127.3(4), (7)
 - service of documents on, 244(20)(b)
 - small business deduction, 125(6)
 - soft costs relating to construction, 18(3.1)(b), 18(3.2)(b)(iii)
 - specified member, defined, 248(1)
 - taxable dividends received by, 186(6)
 - taxation year of, 96(1)(b)
 - terminated
 - fiscal period of, 99(1)
 - member’s election re fiscal period, 99
 - tiered, *see* Tiers of partnerships
 - transfer of property by partner to, 97(1), (2)
 - transfer of property to corporation, 85(2)
 - partnership wound up, 85(3)
 - “undepreciated cost to the partnership”, ITAR 20(4)“undepreciated cost to the partnership”
 - unit, *see* Limited partnership unit; Partnership interest
 - value of rights or things on death, 53(1)(e)(v)

Index

- Partnership (*cont'd*)
- winding-up of, *see* ceasing to exist (*above*)
 - withholding tax, 227(15)
- Partnership distributions tax**, 197, *see* SIFT partnership
- Partnership interest**, *see also* Limited partnership unit
- acquired through amalgamation, 87(2)(e.1)
 - adjusted cost base
 - additions to, 53(1)(e)
 - deductions from, 53(2)(c)
 - negative, whether capital gain, 40(3)–(3.2)
 - recomputation of following debt forgiveness, 53(4)–(6)
 - artificial transactions, 40(3.13)
 - borrowed money used to acquire, 20.1(5)
 - deductions from, 53(2)(c)
 - capital contribution where other person withdraws funds, 40(3.13)
 - constitutes specified property, 54“specified property”(c)
 - disposition of, 100
 - gain from, 100(2), (2.1)
 - loss from, 100(4)
 - subsequent to debt forgiveness, deemed capital gain, 80.03(2), (4)
 - distributed to parent on winding-up of subsidiary, 88(1)(a.2), (c)
 - donation to charity, whether no capital gain, 38(a.3)
 - expenses of selling or financing, 20(1)(e)
 - foreign affiliate’s, adjusted cost base of, 95(2)(j)
 - issuance of, whether deductible to partnership, 143.3(4)
 - limited liability partnership, *see* Limited liability partnership
 - loan of, 96(1.7)
 - owned on Dec. 31/71, ITAR 26(9)–(9.4)
 - person having, deemed member, 248(13)
 - qualified investment for RRSP etc., Reg. 4900(1)(n)
 - residual, 98.1(1)
 - transfer on death, 98.2
 - whether taxable Canadian property, 248(1)“taxable Canadian property”(g)
- Parts**
- deemed to be inventory, 10(5)
 - valuation of, 10(4)
- Partsperson**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Party planning or organizing relief (COVID)**, Reg. 8901.1(2)(b)(xx)(B), *see also* Qualifying tourism or hospitality entity
- Pass**
- transit, *see* Public Transit Pass Credit
- Passenger automobile**
- defined (for pre-1966 cars only), Reg. 1102(11)
- Passenger vehicle**, *see also* Automobile; Zero-emission passenger vehicle
- acquired at non-arm’s length
 - deemed cost of, 13(7)(h)
 - capital cost limited to \$24,000, 13(7)(g)
 - defined, 248(1)
 - electric, *see* Zero-emission passenger vehicle
 - hydrogen, *see* Zero-emission passenger vehicle
 - interest on money borrowed to buy
 - limitation on deductibility, 67.2
 - leasing costs
 - limitation on deductibility, 67.3
 - more than one lessor, limitation on deductibility, 67.4
 - luxury, limitations on, *see also* Luxury Items Tax
 - bad debt from sales of, 20(4)
 - capital cost allowance, 13(7)(g), Reg. 1101(1af), 7307(1), Reg. Sch. II:Cl. 10.1
 - year of disposition, Reg. 1100(2.5)
 - interest deductibility, 67.2, Reg. 7307(2)
 - leasing cost, 67.3, 67.4, Reg. 7307(3), (4)
 - terminal loss disallowed, 20(16.1), Reg. 1100(2.5)
 - recapture exception, 13(2)
 - transferred to corporation by shareholder
 - capital cost or cost, 85(1)(e.4)
- Passive income**
- dividends, 82(1), 90
 - foreign affiliate, *see* Foreign accrual property income
 - generally, 9(1)
 - interest, 12(1)(c), 12(4)
 - non-resident, of, 212
 - private corporations
 - refundable dividend tax on hand, 129(1), (4), (5)
 - small business deduction grind, 125(5.1)(b), (5.2)
- Passive NFE**
- defined, for Common Reporting Standard, 270(1)
- Passive partner**, *see* Limited partner; Specified member (of partnership)
- Past service event**
- defined, 147.1(1), Reg. 8300(1), (2)
 - restrictions on pension benefits, 147.1(10)
- Past service pension adjustment**
- accumulated, Reg. 8303(1)(a)
 - defined, 248(1), Reg. 8303
 - foreign plan, Reg. 8308.1(5), (6)
 - net
 - calculation of, 204.2(1.3)
 - defined, 146(1)“net past service pension adjustment”
 - occurring in 1991, Reg. 8303(2.1)
 - provisional, Reg. 8303(2), (3)
- Patent**
- application, legal fees deductible, 20(1)(cc)
 - capital cost allowance
 - 25% rate, Reg. 1100(1)(a)(xxx), 1100(9.1), Reg. Sch. II:Cl. 44
 - allocated over life of patent, Reg. 1101(1)(c), 1100(9), Reg. Sch. II:Cl. 14
 - non-resident withholding tax, 212(1)(d)
 - paid to U.S. resident, Canada-U.S. Tax Treaty:Art. XII:3(c)
- Patient**
- defined, 118.2(2)(a)
 - medical expenses for, 118.2(2)
- Patronage**
- allocation in proportion to
 - defined, 135(4), Reg. 4901(2)
 - holding forth prospect of, 135(5)
 - members/non-members, 135(2)
- Patronage dividends**, 135
- carryover of deduction, 135(2.1)
 - deduction, 20(1)(u), 135(1)
 - exclusion where non-arm’s length, 135(1.1)
 - paid to non-resident, 212(1)(g)
 - payments, information return, Reg. 218
 - receipt of, income, 135(7)
 - where marketing board used, 135(8)
- Pattern**
- capital cost allowance, Reg. Sch. II:Cl. 12(d)
- Pay equity**
- averaging of settlement received, 110.2, 120.31
- Pay period**
- defined
 - for employee source withholdings, Reg. 100(1)
 - for exemption test policy (life insurance), Reg. 310
- Payable**
- meaning of, 104(24)

Index

Payee

- defined, Reg. 237(1)

Payee certificate for non-resident, Reg. 805.1

Payer

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

Payment, *see also* Deductions in computing income; Expenses; Income; Payment of tax

- based on production or use, income, 12(1)(g)
- defined, for hybrid mismatch arrangement rules, 18.4(1)
- ITA, under, not deductible from business or property income, 18(1)(t)
- instalment, *see* Instalment payments
- lump sum, withholding, Reg. 103
- maintenance and support, *see* Support payments (spousal or child)
- non-residents, to, Part XIII
- information return, Reg. 202
- periodic, *see* Periodic payments
- shareholder or prospective shareholder, to, 15(7)
- from corporation, 15(1)
- tax, *see* Payment of tax
- tax transfer, to provinces, 154, Reg. 3300
- to CRA over \$10,000, must be electronic, 160.5(2), 162(7.4)

Payment card corporation, *see* Prescribed payment card corporation share

Payment of tax, 153, 156, 158

- balance due day, defined, 248(1)
- carved-out income, on, 209(4)
- certificate before distribution, 159(2)
- failure to obtain, 159(3)
- corporations, 157
- where instalments not required, 157(2.1)
- death of taxpayer, on
- election to pay in instalments, 159(5)
- deduction at source, 153(1)
- deemed, *see also* refundable credits
- trust, by, re non-qualified investment, 202(6)
- deferral of
- appeal for purpose of, penalty, 179.1
- deferred income plans
- over-contributions, 204.3
- property held by, 207.2
- departure tax
- election to defer, 220(4.5)–(4.54), Reg. 1300
- farmers and fishermen, 155, 156.1
- individuals, 153(2), 156, 156.1
- instalment, *see also* Instalment payments (Instalments)
- non-residents, 215
- on behalf of others, 159
- Part I.1, 180.1(3)(b)
- Part I.2, 180.2(5)(b)
- Part II, 183(2)
- Part II.2, 183.3(2)
- Part III, 185(2)
- Part III.1, 185.2(4)
- Part IV, 187(2)
- Part IV.1, 187.2
- Part V, 188(1.1), 189(6)
- Part VI, 190.21
- Part VI.1, 191.1(1)
- Part VI.2, 191.5(2)
- Part IX, 196
- Part IX.1, 197(7)
- Part X, 198(2)
- Part X.1, 204.3(1)
- Part X.2, 204.7(1)
- Part X.3, 204.86(1)(c)
- Part X.4, 204.92(c)

- Part XI.1, 207.2(1)
- Part XI.2, 207.4
- Part XI.3, 207.7(3)
- Part XI.4, 207.8(4)
- Part XII.1, 209(4)
- Part XII.3, 211.4
- Part XII.4, 211.6(4)
- Part XII.5 tax, 211.8(2), 211.82
- Part XIII, 215(1)
- Part XIV, 219(1)
- postponement, where income in blocked currency, 161(6)
- public authorities disposing of cultural property, 207.3, 207.4
- registered investment, 204.7
- remainder payment, 158
- retirement compensation arrangement, 207.7(3)
- security for, 220(4)–(4.4), Reg. Part XXII
- taxpayer leaving Canada, 226(1)
- transfer among tax accounts, 221.2
- trustee, etc., 159(1)
- personal liability, 159(3)

Payment rate

- for carbon tax refund to farmers, 127.42(1)

Payoffs

- no deduction for, 67.5

Payroll deduction, *see* Withholding

Payroll taxes (provincial)

- deductibility of, 18

Payroll withholding, *see* Withholding

Peak shaving facility (re LNG liquefaction)

- defined, Reg. 1104(18)

Pearen case overruled, 118.2(2.21)

Peat

- property for use in harvesting, 127(9)“qualified property”

Penalty, *see also* Offences

- appeal without reasonable grounds, 179.1
- burden of proof of offence on Minister, 163(3)
- charity, *see* Registered charity: penalties
- confidential information, contraventions re, 239(2.2)
- conviction of offence, on, 238(1), 239
- second penalty, when applicable, 239(3)
- corporation’s failure to file information return, 162(10)
- court has no power to decrease punishment, 243
- deficient instalments of tax, 163.1
- destruction of records, for, 239(1)
- dishonoured cheque, for, 162(11)
- electronic sales suppression software, 163.3, *see also* Zapper software (or hardware)
- failure to file information return electronically, 162(7.02)
- failure to file prescribed form, R&D corporation, 149(7.1)
- failure to file return, 162(1)
- electronically, where required, 162(7.2)
- repeated penalties, 162(2)
- trustees etc., 162(3)
- failure to provide SR&ED claim preparer information, 162(5.1)
- failure to provide Taxpayer Identification Number to financial institution for provision to foreign tax authorities, 281(3)
- failure to remit tax withheld, 227(9)
- applicable only on amounts over \$500, 227(9.1)
- salary or wages, from, 227(9.5)
- failure to withhold tax, 227(8)
- salary or wages, from, 227(8.5)
- false statement, 163(2), 239(1)
- by third party or tax preparer, 163.2
- charity receipt, 188.1(9), (10)
- re renunciation of resource expenses, 163(2.2)
- frivolous appeal, 179.1
- general anti-avoidance rule applying, 245(5.1)

Index

- Penalty (*cont'd*)
 - gross negligence, 163(2)
 - incomplete return, 162(5)
 - incorrect tax shelter identification number, for providing, 239(2.1)
 - interest on, 161(11)
 - large corporations, late return, 235
 - late-filed election, 220(3.5)
 - capital gains exemption triggering, 110.6(26), (29)
 - disposition of share in foreign affiliate, 93(6)
 - partners, 96(6)
 - transfer to corporations, 85(8), (9)
 - late filing of form re renunciation of resource expenses, 66(12.75)
 - late filing of return, 162(1), 235
 - late instalments of tax, 163.1
 - misrepresentation, 163(2)
 - by third party or tax preparer, 163.2
 - not deductible from income, 18(1)(t), 67.6
 - ownership certificates, offences re, 162(4)
 - Part II.2 tax, 183.4(2)
 - Part IV.1 tax, 187.6
 - Part VI.1 tax, 191.4(2)
 - Part VI.2 tax, 191.6
 - Part XII.2 tax, 210.2(7)
 - Part XII.3 tax, 211.5
 - Part XII.4 tax, 211.6(5)
 - Part XII.5 tax, 211.82
 - partnership information return, failure to file, 162(7.1), (8.1)
 - payment over \$10,000 made non-electronically, 162(7.4)
 - registered charity, *see* Registered charity: penalties
 - regulations, failure to comply with, 162(7)
 - remittance over \$10,000 made non-electronically, 162(7.4)
 - repeated assessments of, 162(2)
 - repeated failures to report an amount of income, 163(1)
 - sales suppression software, 163.3, *see also* Zapper software (or hardware)
 - Social Insurance Number
 - failure to provide, 162(6)
 - wrongful communication of, 239(2.3)
 - tax advisor, 163.2
 - tax shelter identification number, offences re, 237.1(7.4)
 - deduction disallowed while penalty unpaid, 237.1(6.1)
 - third party, 163.2
 - transfer pricing, 247(3), (11)
 - waiver of, by Minister, 220(3.1)
 - zapper software, 163.3, *see also* Zapper software (or hardware)
- Pension**, *see also* Pension plan; Canada Pension Plan/Quebec Pension Plan
 - adjustment, *see* Pension adjustment
 - benefits, *see also* income (below)
 - income, 56(1)(a)(i)
 - exemption, 57
 - paid to non-resident, 212(1)(h)
 - election to file return, 217
 - paid to U.S. resident, Canada-U.S. Tax Treaty:Art. XVIII
 - paid to widow(er), 57(5)
 - received in error, deduction for repayment, 60(n.1)
 - transferred to another plan, deductible, 60(j)
 - unpaid, 78(4)
 - bridging benefits, *see* Bridging benefits
 - credit, *see* Pension credit
 - defined, *Income Tax Conventions Interpretation Act* s. 5; Canada-U.S. Tax Treaty:Art. XVIII:3; Canada-U.K. Tax Treaty:Art. 17:3
 - disability benefit
 - constitutes earned income for RRSP, 146(1)“earned income”(b.1)
 - Halifax disaster, exempt, 81(1)(f)
 - income, *see also* benefits (above)
 - credit for, 118(3)
 - unused, transfer to spouse, 118.8
 - defined, 60.03(1), 118(7)
 - qualified, defined, 118(7)
 - splitting with spouse
 - deduction to pensioner, 60(c)
 - income inclusion to transferee, 56(1)(a.2)
 - joint liability for tax, 160(1.3)
 - revocation of election, 220(3.201)
 - rules, 60.03
 - source deductions, 153(1.1), (2)
 - paid to non-resident, 212(1)(h)
 - election to file return, 217
 - paid to U.S. resident, Canada-U.S. Tax Treaty:Art. XVIII
 - periodic payments, *see* Periodic pension payment
 - plan, *see* Pension plan
 - RCMP, exempt, 81(1)(i)
 - service, exempt, 81(1)(d)
 - from other country, exempt, 81(1)(e)
 - superannuation or pension benefits
 - defined, 248(1)
 - surplus, *see* Pension surplus
 - **Pension Act, pension under, exempt**, 81(1)(d)
 - **Pension adjustment**, *see also* Pension credit
 - defined, 248(1), Reg. 8301(1), *see also* Pension credit
 - limits, 147(5.1)(c), 147.1(8), (9), Reg. 8506(2), 8509(12)
 - past service, *see* Past service pension adjustment
 - reversal, *see* Pension adjustment reversal
 - special rules, Reg. 8308
 - **Pension adjustment correction**, *see also* Permitted corrective contribution (to pension plan)
 - defined, Reg. 8304.1(16)
 - included in “total pension adjustment reversal”, Reg. 8304.1(1)(b)
 - information return required, Reg. 8402.01(4.1)
 - **Pension adjustment reversal**
 - defined, 248(1)“total pension adjustment reversal”, Reg. 8304.1
 - effect of, 146(1)“RRSP deduction limit”R, 146(1)“unused RRSP deduction room”(b)R, 204.2(1.1)(b)R
 - regulations respecting, 147.1(18)(d), (t), Reg. 8304.1
 - reporting requirements, Reg. 8402.01
 - **Pension benefits**, *see* Pension: benefits; Pension: income
 - **Pension benefits act, provincial**
 - registration under, 147.1(2)(a)(iii)
 - **Pension Benefits Guarantee Fund**
 - exempt from income tax, 149(1)(o.5)
 - prescribed person for pension investment corp., Reg. 4802(1)(f.1)
 - **Pension Benefits Standards Act**
 - administration of
 - communication of information obtained under ITA, 241(4)(d)(vii)
 - registration under, 147.1(2)(a)(iii)
 - **Pension corporation**
 - exemption, 149(1)(o.1), (o.2)
 - **Pension credit**, *see also* Pension adjustment
 - artificial reduction of, Reg. 8503(14)
 - calculation of, Reg. 8301
 - deferred profit sharing plan, Reg. 8301(2)
 - foreign plan, Reg. 8308.1(2)–(4)
 - registered pension plan
 - defined benefit provision
 - multi-employer plan, Reg. 8301(7)
 - ordinary plan, Reg. 8301(6)
 - specified multi-employer plan, Reg. 8301(5)

Index

Pension credit (*cont'd*)

- downsizing benefits, effect of, Reg. 8308(9)
- money purchase provision, Reg. 8301(4)
- non-vested termination, Reg. 8301(8), (9)
- remuneration for prior years, Reg. 8308(3)(b)
- replacement of benefits, effect of, Reg. 8304
- transitional rule, Reg. 8301(10)
- rounded to nearest dollar, Reg. 8311
- specified retirement arrangement, Reg. 8308.3(2)–(5)
- United States treaty, tax credit, Reg. 8308.1(2.1)
- constitutes pension adjustment, Reg. 8301(1)
- DPSP contribution limits, effect on, 147(5.1)
- multi-employer plan, effect on PA limit, 147.1(9)
- non-refundable credit, for \$1,000 of pension income, 118(3)
- reporting of, Reg. 8401(3)

Pension fund investment corporation, 149(1)(o.2)(iii)

Pension fund of a governmental entity, international organization or central bank

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

Pension fund real estate corporation, 149(1)(o.2)(ii)

Pension income, *see also* Pension: benefits; Pension: income

- defined, 60.03(1), 118(7)
- Pension plan, *see also* Registered pension plan**
 - appeal from refusal to register, 172(3)(f), 172(5)
 - benefits flowed through trust, 104(27)
 - Canada, *see* Canada Pension Plan/Quebec Pension Plan
 - contract under, 254
 - dollar limits, *see* Pension adjustment
 - foreign plan, *see* Foreign plan (pension plan)
 - individual, Reg. 8515
 - legal expenses of collecting or establishing right to benefit under
 - deduction for, 60(o.1)
 - income when recovered, 56(1)(1.1)
 - provincial, *see* Specified pension plan
 - pooled, *see* Pooled pension plan; Pooled registered pension plan (PRPP)
 - Quebec, *see* Canada Pension Plan/Quebec Pension Plan
 - registered, *see* Registered pension plan
 - Saskatchewan, *see* Specified pension plan
 - surplus, *see* Pension surplus
 - transfers between, 147.3

Pension surplus

- transfer of, 147.3(4.1), (7.1)

Pension transferee

- defined, 60.03(1)
- income inclusion to, for split pension income, 56(1)(a.2)
- joint liability for tax on split pension income, 160(1.3)
- source deductions deemed withheld for, 153(2)

Pension trust

- exempt, 149(1)(o)

Pensionable service

- defined, Reg. 8500(1)

Pensioner

- deduction to, for split pension income, 60(c)
- defined, 60.03(1)
- joint liability for tax on split pension income, 160(1.3)

Percentage

- rates of tax, *see* Rates of tax
- specified, *see* Specified percentage

Performer, *see* Actor

Period of disability

- defined, Reg. 8500(1)

Period of reduced services

- defined, Reg. 8300(1)

Periodic child care expense amount

- defined, 63(3)

Periodic payments

- accrual to date of death, 70(1)(a)
- alimony/maintenance/support, 56(1)(b)–(c.2), 56.1, 60(b)–(c.2), 60.1
- pension, *see* Periodic pension payment
- tax deduction, determination of, Reg. 102

Periodic pension payment

- defined, *Income Tax Conventions Interpretation Act* s. 5

Periodical

- advertising in, limitation, 19.01(2)–(4)
- defined, 19.01(1)
- edition of, meaning, 19.01(6)

Permanent establishment

- defined
 - Canada–U.S. Tax Convention, Canada-U.S. Tax Treaty:Art. V
 - corporation, Reg. 400, 8600
 - for country-by-country reporting, 233.8(1), Reg. 8201
 - for FAPI purposes, 95(1), Reg. 5906(2)
 - for leasing-property rules, 16.1(1), Reg. 8201
 - for restrictive-covenant rules, 56.4(1), Reg. 8201
 - for various purposes, Reg. 8201
 - individual, Reg. 2600
- dividend from non-resident corporation having, 112(2), Reg. 8201
- for allocating income among provinces
 - of corporation, Reg. 400
 - of individual, Reg. 2600
- international tax treaties
 - applies for FAPI purposes, Reg. 5906(2)(a)(i), 5906(2)(b)(i)
 - Canada–U.K. convention, Art. 5
 - Canada–U.S. convention, Canada-U.S. Tax Treaty:Art. V
- profits allocated to, *Income Tax Conventions Interpretation Act* s. 4
- securities lending arrangement, 260(5), Reg. 8201
- specified leasing property, 16.1(1), Reg. 8201
- tax on property forming part of, Canada-U.S. Tax Treaty:Art. XXIII:2

Permitted acquisition

- defined, for butterfly, 55(1)

Permitted corrective contribution (to pension plan), *see also* Pension adjustment correction

- deductible to employee, 147.1(1)(a)(ii)
- deductible to employer, 147.1(4)(a)(ii)
- defined, 147.1(1)
- information return required, Reg. 8402(4)
- permitted, 147.1(20)

Permitted deferral

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

Permitted exchange

- defined, for butterfly, 55(1)

Permitted redemption

- defined, for butterfly, 55(1)

Perpetual poverty, vow of, 110(2)

Person, *see also* Taxpayer

- defined, Canada-U.S. Tax Treaty:Art. III:1(e); Canada-U.K. Tax Treaty:Art. 3:1(c)
- includes partnership for specific purposes, 66(16), 79(1), 79.1(1), 80(1), 80.01(1), 80.02(1), 80.03(1)(a), 80.04(1), 135.2(1), 139.1(1), 160.01(1), 163.2(1), 187.4(c), 209(6), 227(5.2), (15), 237.1(1), 237.3(1), 237.4(1), 237.5(1), 251.1(4)(b), 251.2(1), 256.1(1)
- related by blood, defined, 251(6)

Personal credits, 118, *see also* Tax credits

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

Personal injury award

- election re capital gains, 81(5)
- income from exempt, 81(1)(g.1), (g.2)

Personal or living expenses

- allowance for, taxable, 6(1)(b)
- defined, 248(1)
- not deductible, 18(1)(h)

Personal property

- located on ship or aircraft used in international traffic, whether taxable Canadian property, 248(1)“taxable Canadian property”(b)(ii)

Personal service

- defined, for digital platform operator reporting rules, 282(1)

Personal services business

- defined, 125(7), 248(1)
- excluded from active business income, 125(7)“active business carried on by a corporation”
- expenses, limitation on deductibility of, 18(1)(p)
- incorporated employee, defined, 125(7)“personal services business”(a)
- loans, 12(1)(w), 80.4(1)
- rate of tax on, 123.4(1)“full rate taxable income”(a)(iii), 123.5
- retirement compensation arrangement, 207.6(3)

Personal trust, *see also* Trust (or estate)

- defined, 110.6(16), 248(1)
- effect of qualifying disposition, 107.4(3)(i)
- disposition of capital interest in, 107(1)(a)
- distribution of property to beneficiary, 107(2), (4.1)
- emigration of beneficiary, whether deemed disposition of interest, 128.1(10)“excluded right or interest”(j)
- income interest in, defined, 108(1)
- non-arm’s length with beneficiary, 251(1)(b)
- principal residence exemption, 54“principal residence”

Personal-use property, *see also* Listed personal property

- adjusted cost base of, 46(1), (2)
- bad debt that is, 50(2)
- defined, 54
- disposition of
 - capital loss nil, 40(2)(g)(iii)
 - in part, 46(2)
- ordinarily disposed of as a set, 46(3)

Pertinent loan or indebtedness

- deemed interest income from, 17.1
- defined
 - for foreign-affiliate dumping rules, 212.3(11)
 - for shareholder-loan rules, 15(2.11)

Pertinent person or partnership

- defined, for artificial foreign tax credit generator rules, 91(4.3), Reg. 5907(1.05)

Petro-Canada, subject to tax, 27(2), Reg. 7100**Petroleum/natural gas**

- allowances, Reg. Part XII
- corporations, *see* Drilling or exploration expense; Exploration and development expenses; Prospecting
- cost of substance injected to recover, 20(1)(mm)
- dealers in, limitation, 66(5)
- exploration and development expenses, 66
- exploration equipment etc., capital cost allowance, Reg. Sch. II:Cl. 10(t), Sch. II:Cl. 41
- flow-through shares eliminated after March 2023, 66(12.6)(b.2)
- liquefied natural gas facility, capital cost allowance, Reg. Sch. II:Cl. 47(b)
- pipeline for natural gas distribution, Reg. Sch. II:Cl. 51

Phantom stock plan

- emigration or immigration, no deemed disposition, 128.1(10)“excluded right or interest”(a)(vii)

Pharmacist

- defined, 118.4(2)

Phase (of a project)

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

Phased retirement, Reg. 8503(16)–(25)

- *Phénix case overruled*, 66.1(6)“Canadian exploration expense”(k.1), 66.2(5)“Canadian development expense”(i.1)

Photocopier

- capital cost allowance, Reg. 1101(5p), Reg. Sch. II:Cl. 10(f)

Photocopy, *see* Copy of document**Phototherapy equipment, medical expense credit, 118.2(2)(i)****Photovoltaic equipment**

- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(vi), Sch. II:Cl. 43.1(d)(xiii), Sch. II:Cl. 43.2(b)

Physical activity

- defined, Reg. 9400(1)
- prescribed program, for children’s fitness credit, Reg. 9400

Physician, *see* Medical doctor**Physiotherapist**

- certification of impairment
 - for disability credit, 118.3(1)(a.2)(v)

Pick-up truck

- deemed not to be automobile, 248(1)“automobile”(e)

Pilot, *see* Aircraft: pilot**Pilot plants, qualify for R&D investment tax credits, Reg. 2900(11)(c), (d)****Pinball arcade relief (COVID), Reg. 8901.1(2)(b)(ix)(A)(IV), (b)(xv), *see also* Qualifying tourism or hospitality entity****Pinball machine**

- capital cost allowance, Reg. Sch. II:Cl. 16(f)

Pink Sheets quoted stocks

- qualified for deferred income plans before 2002, Reg. 4900(1)(s) [repealed]

Pipeline

- capital cost allowance, Reg. Sch. II:Cl. 1(l), Sch. II:Cl. 2(b), Sch. II:Cl. 49, Sch. II:Cl. 51
 - defined, IT-482R para.1
 - exhausted within 15 years, Reg. Sch. II:Cl. 8(i)
 - for mine, Reg. Sch. II:Cl. 10(l)
 - gas or oil well equipment, Reg. 1104(2), Reg. Sch. II:Cl. 10(j)
 - natural gas distribution, for, Reg. Sch. II:Cl. 51
 - separate classes if cost over \$10 million, Reg. 1101(5i), (5j)
 - linefill in, no CCA, Reg. 1102(1)(k)
 - post-mortem, 84(2) (Notes)
 - transmission, *see* Transmission pipeline

Pipeline operators

- taxable income earned in a province, Reg. 411

Piping, *see* Underground piping**Plan fees**

- payment by owner of registered plan, not an advantage conferred on plan, 207.01(1)“advantage”(b)(i)

Plan payment (for RDSP assistance payment withholding)

- defined, Reg. 103.1(1)
- withholding required, Reg. 103.1(2)

Plan trust

- defined
 - for qualified investment regulations, Reg. 4901(2)
 - for registered disability savings plan, 146.4(1)

Planning activity

- defined
 - for tax-debt avoidance penalty, 160.01(1), 163.2(1)
 - for third-party penalty, 163.2(1)

Plant residue

- defined, Reg. 1104(13)

Plant Workers Adjustment Program

- overpayments repaid, deductible, 60(n)(v)
- payments received under, taxable, 56(1)(a)(vi), Reg. 5502

Index

- Plant Workers Adjustment Program (*cont'd*)
- withholding of tax at source, 153(1)(m), Reg. 5502
- Platform**
- defined, for digital platform operator reporting rules, 282(1)
- Platform operator**
- defined, for digital platform operator reporting rules, 282(1)
- Platinum metal**, *see* Critical mineral
- Plumber**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Plural included in singular**, *Interpretation Act* s. 33(2)
- Points**
- allocated in determining whether film/video production qualifies as credit, Reg. 1106(5)
- Poland**, *see also* Foreign government
- stock exchange recognized, 262
 - universities, gifts to, Reg. Sch. VIII, s. 12
- Police officer**, *see also* Royal Canadian Mounted Police
- communication of information to by CRA, 241(4)(p)
 - high-risk overseas missions, income not taxed, 110(1)(f)(v)
 - killed in line of duty, tax-free benefit to families, 81(1)(j)
 - moneys seized from tax debtor by, 224.3
 - pension accrual to retire early, *see* Public safety occupation
 - RCMP, disability pension exempt, 81(1)(i)
 - vehicle of, deemed not to be automobile, 248(1)“automobile”(b.1)
- Policy**, *see* Insurance policy; Life insurance policy
- Policy anniversary**
- defined, Reg. 310, 1401(3)
- Policy dividend**
- on demutualization, deemed not to be, 139.1(8)
- Policy liability**
- of insurer, defined [repealed], Reg. 1408(1)
- Policy loan (life insurance)**
- amount payable in respect of, 138(12), 148(9)
 - defined, 138(12), 148(9), 211(1), Reg. 310, 1408(1)
 - interest limitation, 20(2.1), Reg. 4001
 - repayment of, 60(s)
- Policy reserves**, *see see* Insurance corporation: policy reserves
- Policy year**
- ending in taxation year, 6(4), (5)
- Policyholders' liabilities**
- defined
 - for determining insurer's capital, 138(12), 181(2), Reg. 8600
 - for insurers' IFRS transition rules, 138(12), Reg. 2400(1)
 - for Part VI tax on financial institutions, 190(1)
- Political activity**
- of Canadian amateur athletic association, 149.1(6.201)
 - of charitable foundation, 149.1(6.1)
 - of charitable organization, 149.1(6.2)
- Political contribution**
- books and records, 230.1
 - eligible amount of contribution, 248(30)–(33)
 - information returns, Reg. 2001
 - not deductible, 18(1)(n)
 - receipts, Reg. 2000, 2002
 - tax credit for, 127(3)–(4.2)
 - limit on valuation of property contributed, 248(35)–(38)
- Political party**, *see also* Political contribution
- deregistration of, no tax receipt allowed while Court application pending, 127(3.3)
- Pollution control equipment**
- capital cost allowance, Reg. 1100(1)(t)
- Pollution tax**, *see* Carbon tax refunds
- Ponzi scheme**
- income tax treatment of, 9(1) (Notes), 9(2) (Notes)
- Pool amount**
- defined, for functional currency election, 261(7)(d)
- Pooled fund trust**, *see* Master trust (or Pooled fund trust)
- Pooled pension plan**, *see also* Pooled registered pension plan (PRPP)
- defined, 147.5(1), 248(1)
- Pooled RPP**, *see* Pooled registered pension plan (PRPP)
- Pooled registered pension plan (PRPP)**, 147.5
- benefit from
 - non-resident withholding tax, 212(1)(h)
 - qualifies for pension income credit, 118(7)“pension income”(a)(i), (iii.2)
 - taxable, 56(1)(z.3), 147.5(13)(a), (16), (18)
 - benefits permissible under, 147.5(5)
 - business carried on by, 147.5(8)
 - death of member, 147.5(14)–(20)
 - rollover of PRPP to survivor's RRSP, 60(1)(v)(A.1), (B.01), (B.1)(II)1
 - deemed not to be RCA, 248(1)“retirement compensation arrangement”(a.1)
 - deemed not to be SDA, 248(1)“salary deferral arrangement”(a.1)
 - disclosure of information for administration of, 241(4)(d)(vii)
 - employer's contribution
 - deductible, 20(1)(q), 147.5(10)
 - included in cumulative excess RRSP amount, 204.2(1.2)I(c)
 - information return, Reg. 214.2
 - made in error, return of permitted, 147.5(3)(d)(ii)(A)
 - taxable when returned, 147.5(13)(b)
 - no taxable benefit, 6(1)(a)(i)
 - reduces RRSP deduction room, 146(1)“unused RRSP deduction room”(b)D(iii), 146(5)(b), 146(5.1)(b)(ii)
 - excluded from various trust rules, 108(1)“trust”(a)
 - exempt income of Indians, contributions from, 147.5(31)–(34)
 - income accruing in
 - not taxed, 147.5(8), 149(1)(u.3)
 - information return, Reg. 213, 214.2
 - interest on money borrowed to invest in, whether deductible, 18(1)(c)
 - member's contribution
 - deductible, 146(5), 147.5(11)
 - information return, Reg. 214.2
 - not taxed, 147.5(8), 149(1)(u.3)
 - prescribed to own shares of pension investment corporations, Reg. 4802(1)(c.3)
 - RRIF may accept transfer from, 146.3(2)(f)(viii)
 - refusal to register, appeal, 172(3)(h)
 - registration conditions, 147.5(2)
 - return of contributions, 147.5(3)(d)(ii)
 - tax-free in certain cases, 56(1)(z.3)(i)
 - reversionary trust rules do not apply, 75(3)(a)
 - revocable plan, 147.5(3), (4)
 - revocation of registration
 - for non-compliance with conditions, 147.5(24)–(27)
 - voluntary, 147.5(28)
 - transfer from, to ALDA, PRPP, RPP, RRSP or RRIF, 147.5(21)
 - RPP may accept transfer, Reg. 8502(b)(iv)
 - transfer to
 - another PRPP, from, 147.5(21)(c)(ii)
 - RRIF, from, 146.3(14.1)(a)
 - withdrawal allowed to reduce Part X.1 over contribution tax, 204.2(5)
- Pornography**
- ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(viii)

- Pornography (*cont'd*)
- ineligible for film/video production services credit, Reg. 9300(2)(h)
- Portfolio investment entity**
- defined, for SIFT trust definition, 122.1(1)
- Portfolio investments**
- dividends on, refundable Part IV tax, 186(1)
- Position**
- defined, for straddle-transaction rules, 18(17)
- Post**, *see* Mail
- Post-emigration loss**, 128.1(8)
- Post-1971 spousal or common-law partner trust**, *see also* Joint spousal or common-law partner trust; Trust (or estate): spouse, for
- deduction from income, 104(6)(b)B(i)
 - defined, 248(1)
 - distribution of property to person other than spouse, 107(4)(a)(i)
 - preferred beneficiary election by, 104(15)(a)
 - transfer by, to another trust, 104(5.8)
- Post-1995 life insurance policy**
- defined [repealed], Reg. 1408(1)
- Post-1995 non-cancellable or guaranteed renewable accident and sickness policy**
- defined [repealed], Reg. 1408(1)
- Post-secondary school level**
- defined, for RESP purposes, 146.1(1)
- Poultry**
- raising, constitutes farming, 248(1)“farming”
- Poverty, vow of**, 110(2)
- Powerline technician**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Pre-acquisition surplus**
- election for dividend to come out of (return of capital), Reg. 5901(2)(b)
- Pre-acquisition surplus (of foreign affiliate)**
- deduction for dividend paid out of, 113(1)(d), Reg. 5900(1)(c)
 - dividend received by partnership, 92(4)–(6)
- Preexisting account**
- defined, for Common Reporting Standard, 270(1)
- Preexisting entity account**
- defined, for Common Reporting Standard, 270(1)
- Preexisting individual account**
- defined, for Common Reporting Standard, 270(1)
- Pre-funded group life insurance policy**
- Pre-1972 capital surplus on hand**
- amalgamation, on, 87(2)(t)
 - on windup of corporation, 88(2)–(2.3)
- Pre-1972 spousal trust**
- deemed disposition by, 104(4)(a.1)
 - defined, 108(1)
- Pre-1986 capital loss balance**
- defined, 111(8)
 - usable, \$2,000 per year, 111(1.1)
- Pre-1996 life insurance policy**
- defined [repealed], Reg. 1408(1), (7)
- Pre-1996 non-cancellable or guaranteed renewable accident and sickness policy**
- defined [repealed], Reg. 1408(1), (7)
- Pre-production mining expenditure**
- Canadian exploration expense, 66.1(6)“Canadian exploration expense”(f)(v.1), (g)
 - defined, 127(9)
 - • reduction for assistance received, 127(11.1)(c.3)
 - investment tax credit for, 127(5)(a)(i), 127(5)(a)(ii)(A), 127(9)“investment tax credit”(a.3)
 - • carryforward or carryback, 127(9)“investment tax credit”(c)
 - • specified percentage, 127(9)“specified percentage”(j)
 - reduces CCEE, 66.1(6)“cumulative Canadian exploration expense”L
- Pre-reversion debt (for functional currency rules)**
- defined, 261(1)
 - rules for, 261(13), (14)
- Pre-transition debt (for functional currency rules)**
- defined, 261(1)
 - rules for, 261(8)–(10), (12)(f)
- Precious metals**
- eligible for RRSP, RRIF etc. investment, Reg. 4900(1)(t)
 - purchase of, information return required, Reg. 230(5)
- Predecessor corporation**, *see* Amalgamation
- Predecessor employer**
- defined, Reg. 8500(1)
 - • definition applies to *Income Tax Act*, 147.2(8), Reg. 8500(1.2)
 - former employee of, for pension plan rules, 147.2(8)
 - pensionable service counts towards member’s benefits, Reg. 8504(2.1)
- Predecessor owner**
- defined, for resource allowance, Reg. 1206(1)
- Preferred beneficiary**
- defined, 108(1)
 - election, 104(14), Reg. 2800
 - • allocable amount, 104(15)
 - • filing deadline, 104(14)–(14.02)
- Preferred-rate amount, for credit union**
- deduction based on, 137(3)
 - defined, 137(4.3)
- Preferred share**, *see also* Short-term preferred share; Taxable preferred share; Term preferred share
- consideration for property transferred to corporation, 85(1)(g)
 - deemed interest on, 258(3)
 - defined, 248(1)
 - issued by loss corporation
 - • where dividends on not deductible, 112(2.4)–(2.9)
 - tax-deferred series, Reg. 2107
 - tax on payment of dividends on, 191.1
 - tax on receipt of dividends on, 82(1), 187.2, 187.3
 - taxable, *see* Taxable preferred share
- Pregnant loss**, *see also* Superficial loss
- rules preventing transfer of,
 - • capital property, 40(3.3), (3.4)
 - • depreciable property, 13(21.2)
 - • share or debt owned by financial institution, 18(13), (15)
- Preliminary work activity**
- defined, for oil sands mine development project, 66.1(6)
 - defined, for oil sands project, Reg. 1104(2)
- Premium**
- defined
 - • Home Buyers’ Plan, 146(1)“premium”, 146.01(1)“premium”
 - • life insurance as taxable benefit, Reg. 2700(2)
 - • life insurance policy, 148(9)“premium”
 - • Lifelong Learning Plan, 146(1)“premium”, 146.02(1)“premium”
 - • obligation owned since before 1972, ITAR 26(12)
 - • registered retirement savings plan, 146(1)“premium”
 - group term life insurance policy
 - • limitation on deductibility, 18(9.01)
 - • taxable benefit to employee, 6(4), Reg. 2700–2704
 - health care insurance, deductible, 20.01
 - home insurance, deduction after moving away, 62(3)(g)
 - life insurance used as collateral, deductible, 20(1)(e.2)

- Premium (*cont'd*)
- prescribed, Reg. 309(1)
 - RRSP, under, 146(1)“premium”
 - refund of, *see* Registered retirement savings plan: refund of premiums
- Premium category**
- defined, Reg. 2700(1)
- Premium paid by the policyholder**
- defined [repealed], Reg. 1408(4)
- Prepaid amounts, taxable when received**, 12(1)(a)
- Prepaid expenses**
- amalgamation, 87(2)(j.2)
 - farming or fishing (cash-basis) business, 28(1)(e), (e.1)
 - limitation re deductibility, 18(9)
- Prepaid insurance benefit**
- defined, Reg. 2703
 - included in taxable group term life insurance, 6(4), Reg. 2701(1)(b)
- Prepaid interest**
- limitations on deduction for, 18(9), 18(9.2)–(9.8)
- Preproduction**, *see* Pre-production mining expenditure
- “Prescribed” defined**, 248(1)
- Prescribed annuity contract**, Reg. 304
- amount included in income, 56(1)(d)
 - deduction, 60(a)
 - excluded from accrual rule, 12(11)“investment contract”, 12.2(1)(b)
- Prescribed benefit**
- government assistance program, excluded from income, 56(1)(a)(vi), Reg. 5502
 - group term life insurance, Reg. 2700–2704
 - RCA advantage rules, none, 207.5(1)“advantage”(e)
 - RRSP and other registered plan advantage rules, none, 207.01(1)“advantage”(e)
 - tax shelter rules, Reg. 3100
- Prescribed CCUS property**
- defined, Reg. 8200.2
 - Dept. of Natural Resources technical guide applies, 13(18.2)
- Prescribed countries**
- for intercorporate dividend from foreign affiliate, Reg. 5907(11)–(11.2)
 - for lower withholding tax, debt issued before 1976, Reg. 1600
 - for tax treaty elections, Reg. 7400(1)
 - stock exchanges recognized, 262
 - treaties with, *see* list of treaties in Table of Contents
- Prescribed credit rating agency**, Reg. 4900(2)
- Prescribed debt obligation**, *see* Debt obligation: prescribed
- Prescribed distribution**
- for foreign spinoff, Reg. 5600
- Prescribed donee**, Reg. 3504
- Prescribed durable goods, for teacher school-supplies credit**, Reg. 9600
- Prescribed energy generation and conservation property**
- for Atlantic investment tax credit, 127(9)“qualified property”(b.1)
- Prescribed excluded property**
- defined, for RRSP etc. prohibited investment, 207.01(1)“excluded property”
- Prescribed intermediate zone**
- credit for residence in, 110.7(1)
 - defined, Reg. 7303.1
- Prescribed labour-sponsored venture capital corporation**
- defined, Reg. 6701
- Prescribed northern zone**
- credit for residence in, 110.7(1)
 - defined, Reg. 7303.1
- Prescribed payment card corporation share**
- defined, Reg. 9002.1(1)
 - excluded from mark-to-market property rules, 142.2(1)“excluded property”(b)
 - property ceasing to be, 142.6(1.4)
- Prescribed plan or arrangement**
- retirement compensation arrangement, Reg. 6802
 - rules re, 207.6(6)
- Prescribed premium**
- life insurance policy, Reg. 309(1)
 - RRSP retribution, Reg. 8307(7)
- Prescribed property**
- tax shelter rules, Reg. 3101
- Prescribed rate (of interest)**, Reg. Part XLIII
- “quarter” defined, Reg. 4300
- Prescribed region**
- of drought, flood or excessive moisture, Reg. 7305.01(1)
- Prescribed securities exchange investment**
- defined, Reg. 9002.2(1)
 - excluded from mark-to-market property rules, 142.2(1)“excluded property”(c)
 - property ceasing to be, 142.6(1.5)
- Prescribed share**
- for capital gains exemption, Reg. 6205
 - for flow-through shares, Reg. 6202.1
 - for lending assets, Reg. 6209
 - for redemption of public corporation shares, Reg. 6206
 - for resource expenditures, Reg. 6202
 - for short-term preferred shares, Reg. 6201(8)
 - for small business investment capital gain rollover, Reg. 6204
 - for stock option rules, Reg. 6204
 - for taxable preferred shares, Reg. 6201(7)
 - for taxable RFI shares, Reg. 6201(4), (5.1)
 - for term preferred shares, Reg. 6201(1)–(3), (5), (6)
- Prescribed stock exchange**, *see* Stock exchange
- Prescribed taxable Canadian corporation**
- for film credit rules, Reg. 1106(2)
- Prescribed trust**, *see* Trust (or estate): prescribed
- Prescribed venture capital corporation**
- defined, Reg. 6700, 6700.1, 6700.2
- Prescription drugs, as medical expense**, 118.2(2)(n)
- President**, *see* Officer: corporation, of
- Pressure pulse therapy device**
- medical expense credit, Reg. 5700(z.4)
- Price adjustment clause**, 85(1) (Notes)
- Priest**, *see* Clergy
- Primary address**
- defined, for digital platform operator reporting rules, 282(1)
- Primary currency (of specified debt obligation)**
- defined, Reg. 9100
- Primary recovery**, Reg. 1206(1)
- Prince Edward Island**, *see also* Province
- Grandparents and Care Providers Program, *see* Kinship care, social assistance for
 - prescribed area, for electrical energy or steam processing, 127(9)“qualified property”(c.1)
 - prescribed designated region, 127(9)“specified percentage”(a)(vi), Reg. 4607
 - qualified property acquired for use in, 127(9)“specified percentage”(a), (e)
 - tax rates, *see* introductory pages
- Principal amount (of debt obligation)**
- defined, 248(1), (26)
 - distress preferred share, 80.02(2)(a)
 - obligation outstanding since before 1972, ITAR 26(1.1)

Principal-business corporation (exploration and development)

- deduction of CEE, 66.1(2)
- defined, 66(15)
- pre-production mining expenditures renounced to, 127(9)“pre-production mining expenditure”(b)
- prescribed deductions, Reg. 1213

Principal-business corporation (real property)

- associated
 - base level deduction, 18(2.3)–(2.5)
- base level deduction, 18(2)(f), 18(2.2)
- excluded from limitation on CCA, Reg. 1100(12)

Principal residence

- capital gains exemption election, effect on, 40(2)(b)A, D, 40(7.1)
- defined, 54
- designation, 54“principal residence”(c), (c.1), Reg. 2301
 - late or amended, or revocation of, 220(3.21)(a.1)
- disposed of to spouse or spousal trust, 40(4)
- disposition after 1981, 40(6)
- distribution by spouse trust, 107(2.01)
- election where change in use, 45(3), Reg. 2300
 - where not available, 45(4)
- exception to rules, 54.1
- farmer’s, exclusion of, 40(2)(c)
- gain on disposition not taxed, 40(2)(b)
- property of trust, 40(6.1), 54“principal residence”(c.1)
- regulations, Reg. 2300, 2301
- relocation rule, 54.1
- satisfaction of interest in trust, 40(7)

Printout

- as proof of electronic document, 244(9)

Prior reference period

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

Prior year revenue decline

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

Priority, *see* Garnishment for taxes unpaid; Ordering**Prison**, *see also* Offences

- person confined to
 - higher-income spouse can claim child-care expenses, 63(2)(b)C(i)(C)
 - no GST credit, 122.5(2)(b)

Private corporation, *see also* Corporation

- Canadian-controlled, defined, 125(7), 248(1)
- capital dividend, election, 83(2), Reg. 2101
- cooperative deemed not to be, 136(1)
- credit union deemed not to be, 137(7)
- Crown corporation deemed not to be, 27(2)
- defined, 89(1), 248(1)
- special cases, 27(2), 134, 136(1), 137(7), 141(2), 141.1, 186(5), 227(16)
- deposit insurance corporation deemed not to be, 137.1(6)
- disclosure of shareholder identities to CRA and the public, *see* Individuals with Significant Control (of corporations)
- dividend paid by, 83(2)
- dividend refund to, 129
- existing since before 1972, ITAR 50
- flow-through of income to shareholders, *see* Integration
- insurance corporation deemed not to be, 141.1
- municipal or provincial corporation deemed not to be, 227(16)
- mutual fund corporation deemed to be, 131(5)
- payment of tax, 157(3)
- subject corporation, 186
- tax on certain dividends received, 186

Private foundation, *see also* Charitable foundation; Registered charity

- acquiring control of a corporation, 149.1(12)(a)
- penalty, 188.1(3)

- revocation of registration, 149.1(3)(c)
- business activities of
 - penalty for carrying on any business, 188.1(1)(a), 188.1(2)(a)
 - revocation for carrying on any business, 149.1(4)(a)
- defined, 149.1(1), 248(1)
- designation of, as public, 149.1(13)
- designation of registered charity as, 149.1(6.3)
- disbursement quota, *see* Disbursement quota (of charity)
- excess holdings regime, 149.1(1)“divestment obligation percentage”, (4.1)(c), 188.1(3.1)–(3.5)
- excluded from reversionary trust rules, 75(3)(b)
- non-qualified investment, *see* Non-qualified investment: private foundation
- registration of, *see* Registered charity

Private health services plan, *see also* Employee life and health trust

- defined, 248(1)
- employee contributions to employee life and health trust deemed to be contributions to PHSP if identified as such, 144.1(10)
- employer’s contribution not a taxable benefit, 6(1)(a)(i)
- premiums
 - deductible from business income, 20.01
 - reduction in partnership interest, 53(2)(c)(xii)
 - medical expense credit, 118.2(2)(q)

Private holding corporation, defined, 191(1)**Privatization of government assets**

- debt qualifies for investment by deferred income plans, Reg. 4900(1)(q)

Privileged documents, *see* Solicitor-client privilege**Prize**

- achievement, for
 - included in income, 56(1)(n)
- lottery, not taxed (no taxing provision)
- prescribed, Reg. 7700
- not included in income, 56(1)(n)
- property acquired as, cost of, 52(4)

Pro rata portion

- defined
 - for mutual fund corporation, TCP gains, 131(6)
 - for mutual fund trust, TCP gains, 132(4)

Probate fees

- avoidance of, 248(1)“alter ego trust”

Procedure and evidence, 244**Procedures not followed by CRA**

- assessment still valid, 166

Proceeds of disposition, *see also* Proceeds of the disposition

- allocation of
 - between land and buildings, 13(21.1), 70(5)(d)
 - between property and services, 68
 - capital property, 54“proceeds of disposition”
- deemed
 - amalgamation, on, 69(13)
 - disposition of share, on, 55(2)–(5)
 - disposition to trust with no change in beneficial ownership, 69(1)(b)(iii)
 - former business property, 44(6)
 - property surrendered to creditor, 79(3)
 - when deemed payable, 14(2) [before 2017]
- defined
 - capital property, 54
 - depreciable property, 13(21)
 - for resource allowance, Reg. 1206(1)
- depreciable property, 13(21)“proceeds of disposition”
- due after year
 - amalgamation, 87(2)(m)
- income interest in trust, 106(3)

Index

- Proceeds of disposition (*cont'd*)
- life insurance policy, interest in, 56(1)(j), 148(9)“proceeds of the disposition”
 - life insurance policy dividends deemed to be, 148(2)
 - timber resource property, 20(5.1)
 - unclaimed at year-end
 - withholding tax, 153(4)
 - effect of remittance, 153(5)
 - uncollectible portion, 20(4)–(4.2)
 - unrealized, 40(1)(a)(iii)
- Proceeds of the disposition**, *see also* Proceeds of disposition
- defined, Reg. 310
- Processing**, *see also* Manufacturing or processing
- allowances, Reg. Part XII
 - defined, for mining tax deduction, Reg. 3900(1)
 - field, *see* Canadian field processing
- Processing property**
- defined, Reg. 1206(1)
- Producer gas**
- defined, for CCA, Reg. 1104(13)
 - equipment for generating, Reg. Sch. II:Cl. 43.1(d)(xvi)
 - equipment for generating energy from, Reg. Sch. II:Cl. 43.1(c)(i)(A), Sch. II:Cl. 43.1(d)(ix)
- Producer (of film or video production)**
- defined, Reg. 1106(1)“producer”
- Producer organization or association**
- farm support payment, information return, Reg. 234–236
- Production**
- resource property, from, defined, 66(15)“production”
 - right to receive, *see* Right to receive production
- Production commencement time**
- defined, for Canadian film tax credit, 125.4(1), (1.1)
- Production or use**
- payments dependent on
 - deemed income, 12(1)(g)
 - interest paid to non-resident, 212(1)(b) (closing words)
- Production tax amount**
- defined
 - for FAPI, Reg. 5910(4)
 - for foreign tax credit, 126(7)
- Professional athlete**
- defined, 143.1(1)
- Professional corporation**, *see also* Professional practice
- defined, 248(1)
 - fiscal period of, 249.1(1)(b)(iii)
- Professional membership dues**
- employee’s, deduction, 8(1)(i)(i)
 - examination fees to qualify, tuition credit, 118.5(1)(d)
 - professions board, deductible, 8(1)(i)(vii)
- Professional partnership**
- defined, 40(3.111)
 - where ACB of partnership interest is less than zero, 40(3.11)A(b), B(c)
- Professional practice**
- carried on since before 1972, ITAR 23(3)
 - examination fees to qualify, tuition credit, 118.5(1)(d)
 - incorporated, *see* Professional corporation
 - judge’s income from, 24.1 [repealed]
 - partnership for, *see* Professional partnership
 - privileged information, 232(2)
 - work in progress of
 - deemed to be inventory, 10(5)(a)
 - election to exclude from income until 2017, 34
 - transitional rule 2017–2020, 10(14.1)
 - valuation of, 10(4)(a)
- Professions board**
- dues to, deductible, 8(1)(i)(vii)
- Professor**
- exemption for travel expenses, 81(3.1)(a)(ii)
- Profit**, *see also* Income
- from business or property, income, 3(a), 9(1)
 - payment based on future, 12(1)(g)
 - reasonable expectation required, 18(1)(h), 248(1)“personal or living expenses”
- Profit participation payments**
- not deductible as financing expenses, 20(1)(e)(iv.1)
- Profit sharing plan**, *see also* Deferred profit sharing plan; Employees profit sharing plan
- appeal from refusal to register, 172(3)(c), 180
 - defined, 147(1), 248(1)
 - employer’s contribution under, 20(1)(w)
 - limitation on deductibility, 18(1)(k)
 - information return, Reg. 212
 - registration of, as DPSP, 147(2)
 - refusal by Minister
 - deemed, 172(4)(b)
 - regulations, Reg. Part XV
- Profits**, *see* Profit
- Program for Older Worker Adjustment**, *see* Older Worker Adjustment, Program for
- Prohibited investment**
- for employee life and health trust
 - defined, 207.9(1)
 - tax on, 207.9(2)
 - for qualifying environmental trust
 - defined, 211.6(1)
 - for RCA
 - becoming or ceasing to be, deemed disposition and reacquisition, 207.61(4)
 - defined, 207.5(1)
 - limitation on RCA election, 207.5(3)
 - tax on, 207.61
 - for RRSP, RRIF, TFSA, RESP or RDSP
 - benefit attributable to, constitutes advantage, 207.01(1)“advantage”(c)(ii)
 - defined, 207.01(1)
 - investment becoming or ceasing to be, 207.01(6)
 - tax on, 207.04(1), (2), (6), (7)
 - waiver of tax, 207.06(2)
 - for registered pension plan, Reg. 8514
- Project phase**, *see* Phase (of a project)
- Project plan (for CCUS project)**
- defined, 127.44(1)
 - new plan must be filed, 127.44(6), (7)
 - required, 127.44(1)“qualified CCUS project”, “qualified carbon capture expenditure”, “qualified carbon storage expenditure”, “qualified carbon use expenditure”
- Prolonged**
- defined, for disability credit, 118.4(1)(a)
- Promissory note**
- conversion to other bond, debenture or note, 51.1
 - issued on rollover of property to corporation, 85(1)(b)
 - provided as payment, 76(1)
- Promoter**
- for non-resident trust rules
 - defined, 94(1)
 - of education savings plan
 - defined, 146.1(1)“education savings plan”(b)
 - of non-resident investment or pension fund
 - defined, 115.2(1)
 - of notifiable transaction
 - defined, 237.3(1), 237.4(1)

Index

- Promoter (*cont'd*)
- of reportable transaction
 - defined, 237.3(1)
 - of tax shelter
 - defined, 149.1(1), 237.1(1)
 - obligation to provide and use identification number, 237.1(5)
- Promotion expenses**, *see* Advertising
- Proof**
- burden of, *see* Burden of proof
 - documents, of, 244(9), (13)
 - rebuttable, *Interpretation Act* s. 25(1)
 - electronically filed return, 244(21)
 - failure to comply, of, 244(7), (8)
 - no appeal, of, 244(10)
 - not required re signature of CRA officer, 244(11)
 - return, etc., of, 244(17)–(19)
 - service, of, 244(6)
 - by mail, 244(5)
 - time of compliance, of, 244(8)
- Property**, *see also* Goods
- acquired
 - as prize, 52(4)
 - by bequest etc., 70(6)
 - by gift, 69(1)(c)
 - by insurer, on default in payment, 138(11.93)
 - from spouse, deemed value of, 73
 - in the year, capital cost allowance, Reg. 1100(2)–(2.4)
 - non-arm's length exception, Reg. 1102(20)
 - to earn income from business, expenses deductible, 20(1)(e)(ii.1), 20(1)(e.1)(ii)
 - adjusted cost base
 - amounts added, 53(1)
 - amounts deducted, 53(2)
 - defined, 54
 - identical properties, 47
 - negative amount, deemed gain, 40(3), (3.1)
 - amortized cost, ITAR 26(12)“capital property”
 - and casualty surplus, *see* Property and casualty surplus (of insurer)
 - annual value of, not deductible, 18(1)(d)
 - appropriation of, to shareholder or prospective shareholder, 15(1), (7)
 - beneficial owner of, defined re Quebec, 248(3)
 - Canadian resource property, defined, 66(15)
 - capital gains and losses, *see* Capital gains and losses
 - “capital property” defined, 54; ITAR 26(12)“capital property”
 - “certified”
 - ascertainment of, 127(10)(a), (b)
 - change in use of, 13(7), 45
 - election, 45(2)
 - insurer, by, 138(11.3)–(11.41), (11.6)
 - principal residence, election, 45(3)
 - where not available, 45(4)
 - convertible, *see* Convertible property
 - cost amount, defined, 248(1)
 - cultural, *see* Cultural property
 - deceased taxpayer, of, 164(6)
 - deemed acquisition of
 - becoming non-resident, 128.1(4)(c)
 - becoming resident in Canada, 128.1(1)(c)
 - capital cost allowance rules, Reg. 1100(2.21)
 - change in use, on, 45
 - deemed disposition of
 - becoming non-resident, 128.1(4)(b)
 - becoming resident in Canada, 128.1(1)(b)
 - capital cost allowance rules, Reg. 1100(2.21)
 - change in use, on, 45
 - death, on, 70(5)–(10)
 - deemed gain from
 - added to cost base, 53(1)(a)
 - defined, 248(1)
 - depreciable, *see* Depreciable property
 - disposed of
 - by legal representative, Reg. 1000
 - in part, 43, 46
 - on death, definitions, 70(10)
 - disposition of, *see* Disposition
 - exchanges of, 13(4), 44
 - replacement property, 44(5)
 - “excluded” of non-resident, 116(6)
 - farm, *see* Farm property
 - foreign, deferred income plans, Reg. Part L
 - former, capital gain, 44(6)
 - goodwill, ITAR 21
 - government assistance in acquiring
 - cost base, deductions from, 53(2)(k)
 - having more than one use, 45
 - identical, 47; ITAR 26(8)–(8.2)
 - defined, 248(12)
 - life insurance corporation, of, 138(11.1)
 - income from, 9(3), 12
 - defined, 9(1)
 - for dividend refund, 129(4)“income” or “loss”
 - for FAPI purposes, 95(1)
 - inter vivos gift of, 69(1)(b)
 - involuntary disposition of, 13(4)
 - leased
 - buildings on, capital cost allowance, Reg. 1102(5)
 - improvements, capital cost allowance, Reg. 1102(4)
 - leasing, capital cost allowance, Reg. 1100(15)–(20)
 - non-arm's length exception, Reg. 1102(20)
 - separate classes, Reg. 1101(5c)
 - listed personal, *see* Listed personal property
 - losses, *see* Non-capital loss; Loss(es)
 - lost, destroyed or taken
 - amalgamation, effects of, 87(2)(1.3)
 - misclassified, 13(6)
 - non-depreciable capital
 - change of control, 53(2)(b.2)
 - “nothings”, ITAR 21
 - owned on Dec. 31/71, ITAR 20(1)
 - part disposition of
 - cost base, deduction from, 53(2)(d)
 - principal residence, *see* Principal residence
 - proceeds of disposition of
 - allocation of, between land and buildings, 13(21.1)
 - defined, 54
 - production from or use of, *see* Production or use
 - publicly traded securities, ITAR 26(11)
 - qualified (investment tax credit), Reg. 4600
 - defined, 127(9), (11)
 - reacquired, ITAR 26(6)
 - real, disposition of by non-resident, 216(5)
 - received as consideration for payment or loan
 - cost base, deductions from, 53(2)(f)
 - rental, capital cost allowance, Reg. 1100(11)–(14.2)
 - replacement, 13(4), (4.1), 14(7) [before 2017], 44(5)
 - repossessed, rules applicable, 79
 - resource, *see* Resource property
 - restricted, *see* Restricted property (for non-resident trust rules)
 - seizure of, by creditor, 79.1
 - small business, Reg. Part LI
 - substituted
 - cost base, addition to, 53(1)(f)
 - meaning of, 248(5)

Index

- Property (*cont'd*)
- surrender of, to creditor, 79
 - tax, *see* Municipality: property taxes
 - timber resource, defined, 13(21)
 - transfer of, *see* Transfer of property
 - trust, proportional holdings in, 259
 - upkeep by trust for beneficiary, 105(2)
 - use of or production from, *see* Production or use
 - value at date of death, 70(5), (6)
- Property and casualty surplus (of insurer)**
- defined, insurers, Reg. 2400(1)
- Property listing**
- defined, for digital platform operator reporting rules, 282(1)
- Property taxes**
- deductible after moving away from home, 62(3)(g)
 - limitation on deduction as business expense, 18(2)
- Proprietor of business**
- disposing of business, 25
 - • fiscal period, 25
 - income from business, 11(1)
 - return on death of, 150(4)
- Proprietorship**
- continuing business of partnership, 98(5)
- Prosecution**
- indictment, upon, 239(2)
 - limitation, 244(4)
- Prospecting**
- amount re share received, excluded from income, 81(1)(I)
 - income from, 35
 - • exemption, 35(1)(c), 81(1)(I)
- Prospector**
- defined, 35(2)
 - receipt of shares by, 35
 - • deduction from amount, 110(1)(d.2)
- Protective trust**
- excluded from qualifying disposition, 107.4(1)(e)
- Protector (of trust)**
- reported to CRA starting 2022, Reg. 204.2(1)(a)
- Province, *see also* specific provinces by name**
- assessment re allocation of provincial income, extension of time for federal reassessment, 152(4)(d)
 - bonds issued by
 - • interest paid to non-resident, 212(1)(b)(ii)(C)(II), 212(6)–(8)
 - bound
 - • by garnishment orders, 224(1.4)
 - • by withholding tax requirements, 227(11)
 - capital tax of, deductibility, 18
 - communication of information to, 241(4)(d), (j.2)
 - corporation incorporated in before part of Canada, 248(1)“corporation incorporated in Canada”
 - corporation owned by, *see also* Crown corporation
 - • bonds issued by
 - • • interest paid to non-resident, 212(1)(b)(ii)(C)(IV)
 - • deemed not private corporation, 227(16)
 - • exemption, 149(1)(d)–(d.4)
 - defined, *Interpretation Act* s. 35(1)
 - • for corporate tax rate, 124(4)
 - • for provincial SIFT tax factor, Reg. 414(1)
 - exempt from federal tax, *Constitution Act 1867*, s. 125
 - gift to, 118.1(1)
 - government of, *see* Government
 - includes Newfoundland and Labrador and Nova Scotia offshore areas, 124(4)“province”
 - income earned in
 - • deduction from tax, re schooling allowance, 120(2)
 - • defined, 120(4)
 - • individual, by, Reg. Part XXVI
 - • income not earned in
 - • • addition to tax for, 120(1)
 - • labour-sponsored venture capital corporation of
 - • • recovery of LSVCC credit, 211.7
 - • laws of
 - • • property transfer to spouse on death, 248(23.1)
 - • • support order transfers, 73(1), (1.1)
 - • legislature, *see* Legislative assembly (or Legislature)
 - • logging tax paid to, credit for, 127(1), (2), Reg. 700
 - • pension legislation, registration under, 147.1(2)(a)(iii)
 - • portion of income tax
 - • • refund by Minister, 164(1.4)
 - • refund of tax of, to be paid by CRA, 164(1.4)
 - • student loan legislation, interest paid under, credit, 118.62
 - • subject to withholding tax provisions, 227(11)
 - • super-R&D allowance, federal benefit, 127(9)“super-allowance benefit amount”, 127(10.1)(b)
 - • tax collection agreement, application of payments, 228
 - • tax transfer payments to, 154, Reg. 3300
- Provincial**
- defined, *Interpretation Act* 33(3), 35(1)“province”
- Provincial indemnities**
- excluded from income, 81(1)(q)
- Provincial laws, prescribed, Reg. 6500–6502**
- Provincial life insurance corporation**
- conversion into mutual corporation, 139
- Provincial pension plan, *see also* Specified pension plan**
- assignment of pension under, attribution rules do not apply, 56(2), (4), 74.1(1)
 - benefits taxable, 56(1)(a)(i)
 - prescribed, *see* Specified pension plan
 - Saskatchewan, *see* Specified pension plan
- Provincial reassessment**
- defined, 152(4)(d)
 - extension of time for federal reassessment, 152(4)(d)
- Provincial SIFT tax rate**
- defined, 248(1), Reg. 414(3)
 - used in calculation of tax payable
 - • by partnership, 197(2)C
 - • by trust, 122(1)(b)A:D, 122(3)“taxable SIFT trust distributions”C
- Provision**
- defined, ITAR 74
- Provisionable assets**
- defined, Reg. 8006
- Provisional past service pension adjustment (PSPA)**
- defined, Reg. 8303(2), (3)
- Proxy amount**
- prescribed, for research and development expenses, Reg. 2900(4)–(10)
 - • reduction in, 127(11.1)(f) [repealed], 127(18)
- Psychologist**
- certification of impairment
 - • for disability credit, 118.3(1)(a.2)(iv)
 - defined, 118.4(2)
 - therapy qualifying for medical expense credit, 118.2(2)(1.9)
- Public authority**
- tax on disposition of cultural property, 207.3
- Public body**
- performing function of government
 - • corporation owned by
 - • • exempt from tax, 149(1)(d.5)
 - • • • exclusion, 149(1.3)
 - • • • income test, 149(1.2)
 - • donation to, 149.1(1)“qualified donee”(a)(iii)
 - • • by corporation, deduction, 110.1(1)(a)
 - • • by individual, tax credit, 118.1(1)“total charitable gifts”

Public body (*cont'd*)

- exempt from tax, 149(1)(c)

Public corporation

- amalgamation, 87(2)(ii)
- defined, 89(1), 248(1)
- election to trigger gain before corporation becomes, 48.1
- existing since before 1972, ITAR 50
- life insurance corporation deemed to be, 141(2)
- mortgage investment corporation, 130.1(5)
- shares of, donation to charity, 38(a.1)
- partnership interests exchangeable for, 38(a.3)
- stock buyback tax, *see* Stock buyback tax

Public employees

- annual dues deductible, 8(1)(i)(iv)

Public foundation, *see also* Charitable foundation; Registered charity

- acquiring control of a corporation, 149.1(12)(a)
- penalty, 188.1(3)
- revocation of registration, 149.1(3)(c)
- business activities of unrelated business
- penalty, 188.1(1)(b), 188.1(2)(b)
- revocation of registration, 149.1(3)(a)
- defined, 149.1(1), 248(1)
- designation of registered charity as, 149.1(6.3)
- private foundation designated as, 149.1(13)
- registration of, *see* Registered charity

Public health restriction

- defined, for COVID-19 Canada Emergency Rent Subsidy, 125.7(1)
- partial, *see* Partial public health restriction

Public institution

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

Public investment partnership

- defined, Reg. 229.1(1)
- requirement to publicize income information, Reg. 229.1(2), (3)(b)

Public investment trust

- defined, Reg. 204.1(1)
- requirement to publicize income information, Reg. 204.1(2), (3)(b)

Public market

- defined, for SIFT trust and partnership distributions, 122.1(1), 248(1)

Public partnership, *see also* SIFT partnership

- defined, Reg. 229.1(1)
- requirement to publicize income information, Reg. 229.1(2), (3)

Public pension benefits

- defined, Reg. 8500(1)

Public policy dialogue

- charity may engage in, 149.1(1)“charitable activities”, 149.1(10.1)

Public primary caregiver

- defined, 146.1(1)

Public safety occupation, *see also* Firefighter; Police officer

- defined, Reg. 8500(1)
- early retirement permitted, Reg. 8503(3)(c)(i)
- higher pension accrual rate permitted, Reg. 8503(3)(g)(i)

Public school board, *see* School board**Public sector authority**

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

Public Sector Pension Investment Board

- prescribed to own shares of pension investment corporations, Reg. 4802(1)(c.2)

Public Transit Pass Credit, 118.02 [pre-2018]**Public trust**, *see also* SIFT trust

- defined, Reg. 204.1(1)
- requirement to publicize income information, Reg. 204.1(2), (3)

Public utility

- foreign
- dividend from, paid to non-resident, 213
- income imputed to shareholder of corporation, 213(2)

Publicly accessible charity information

- defined, 241(10)

Publicly traded

- defined, Reg. 230(1)

Publicly traded liability

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

Publicly-traded securities

- donation of, to charity, zero capital gain, 38(a.1)
- partnership interests exchangeable for, 38(a.3)
- prescribed, for 1971 valuation day, Reg. 4400
- value on Valuation Day, ITAR 26(11), Reg. Sch. VII

Puck, *see* Paid-up capital**Pulp and paper byproduct**

- defined, Reg. 1104(13)
- gas produced by, Reg. 1104(13)“biogas”

Pulp and paper waste

- defined, Reg. 1104(13)
- included in eligible waste fuel, Reg. 1104(13)“eligible waste fuel”

Pumping equipment

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

Punishment, *see* Offences**Purchase butterfly**, 55(1), (3.1), (3.2)**Purchaser shares**

- defined, 85.1(2.2)

Purifier

- air or water, medical expense credit, Reg. 5700(c.1)

Purpose

- gaining or producing income, 18(1)(a), Reg. 1102(1)(c)

“Put-in-use” rules, *see* Available-for-use rules**Q****QCE**, *see* Qualified CCUS expenditure**QCJO**, *see* Qualified Canadian journalism organization**QDT**, *see* Qualified disability trust**QET income tax rate**

- defined, 211.6(1)

QFFP taxable capital gain

- defined, 104(21.21)

QFM, *see* Qualifying family member**QLAD**, *see* Qualifying liquidation and dissolution**QPEPG**, *see* Qualified professional engineer or professional geoscientist**QPIP**, *see* Quebec Parental Insurance Plan**QPP**, *see* Canada Pension Plan/Quebec Pension Plan**QR**, *see* Qualifying renter**QRE**, *see* Qualifying rent expense**QSBC**, *see* Qualified small business corporation**QST**, *see* Quebec sales tax**QTHE**, *see* Qualifying tourism or hospitality entity**QTI**, *see* Qualifying transitional income**Quadrennial survey, reserve for**

- defined, 12(1)(h), 20(1)(o), Reg. 3600(2)

Qualified activities

- defined, Reg. 5202

Index

- Qualified annuity**
 - defined, Reg. 1408(1)
- Qualified CCUS expenditure**
 - defined, 127.44(1)
 - additions to, 127.44(9)
 - reductions to, 127.44(8)
- Qualified CCUS project**
 - defined, 127.44(1)
 - determination of one project vs multiple projects, 127.44(7)
- Qualified Canadian journalism organization**, *see also* Qualifying journalism organization; Registered journalism organization
 - defined, 149.1(1)
 - designation as, 248(1)“qualified Canadian journalism organization”
 - effective date of designation, 168.1(1)
 - revocation of designation, 168.1(2), (3)
- Qualified Canadian labour expenditure**
 - defined, for film/video production services credit, 125.5(1)
- Qualified carbon capture expenditure**
 - defined, 127.44(1)
- Qualified carbon storage expenditure**
 - defined, 127.44(1)
- Qualified carbon transportation expenditure**
 - defined, 127.44(1)
- Qualified carbon use expenditure**
 - defined, 127.44(1)
- Qualified concrete storage process**
 - defined, 127.44(1)
- Qualified construction equipment [repealed]**
 - defined, 127(9)
- Qualified corporation (re Canadian film/video tax credit)**
 - defined, 125.4(1)
- Qualified credit card issuer**
 - defined, for Common Reporting Standard, 270(1)
- Qualified dependant**
 - Canada Child Benefit
 - credit in respect of, 122.61(1)
 - defined, 122.6, 122.62, Reg. 6300–6302
 - Climate Action Incentive
 - credit in respect of, 122.8(4)D
 - defined, 122.8(1)
 - GST credit
 - credit in respect of, 122.5(3)A(c), (d)
 - defined, 122.5(1), 122.5(2)
- Qualified disability trust**
 - ceasing to be, recovery of tax saved, 122(1)(c), 122(2)
 - defined, 122(3)
 - graduated tax brackets apply, 117(2), 122(1)
 - principal residence exemption, 54“principal residence”(c.1)(iii.1)(B)
- Qualified dividend**
 - defined, 112(6.1)
 - stop-loss rules, 112(3.01)–(4.22)
- Qualified domestic trust**
 - relief from double taxation, Canada-U.S. Tax Treaty:Art. XXVI:3(g)
- Qualified donee**, *see also* Charity; Registered charity
 - books and records, requirement to keep, 230(2)
 - charity can transfer funds to, 149.1(2)(b), (c), 149.1(3)(b), (b.1), 149.1(4)(b), (b.1)
 - corporation granting option to, no donations deduction allowed, 110.1(10)–(13)
 - defined, 118.1(1), 149.1(1), 248(1)
 - donations to
 - by corporation, deduction, 110.0(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
 - option granted to, 110.1(10)–(13), 118.1(21)–(24)
 - revocation of registration, 149.1(4.3), 168(1)
 - suspension of receipting privileges, 188.2(2)
- Qualified engineer or geoscientist**, *see* Qualified professional engineer or professional geoscientist
- Qualified expenditure**
 - pool, *see* SR&ED qualified expenditure pool
 - reduction to reflect government assistance, 127(18)–(21)
 - revocation of registration, 149.1(4.3), 168(1)
 - scientific research, for, defined, 127(9)“qualified expenditure”
 - suspension of receipting privileges, 188.2(2)
- Qualified farm or fishing property**
 - capital gains deduction, 110.6(2)
 - defined, 110.6(1)
 - deemed, where capital gain deemed following debt forgiveness, 80.03(8)
- Qualified insurance corporation**
 - defined, Reg. 810(2)
 - property of, no certificate required before disposition, Reg. 810(1)(a)
- Qualified investment**, *see also* Non-qualified investment
 - deferred profit sharing plan, 204“qualified investment”
 - first home savings account (FHSA)
 - defined, 146.6(1), 207.01(1)
 - obligation of issuer, 207.01(5)
 - tax on investment that is not, 207.04
 - information returns, Reg. 221
 - non-resident investment or pension fund
 - defined, 115.2(1)
 - registered disability savings plan, 146.4(1), Reg. 4900
 - tax on investment that is not, 207.04
 - registered education savings plan, 146.1(1)“qualified investment”, Reg. 4900
 - tax on acquiring non-QI, 207.04
 - tax on holding non-QI before 2017, 207.1(3)
 - registered retirement income fund, 146.3(1)“qualified investment”, Reg. 4900
 - tax on investment that is not, 146.3(9), 207.04
 - registered retirement savings plan, 146(1)“qualified investment”, Reg. 4900
 - tax on investment that is not, 146(10.1), 207.04
 - tax-free savings account (TFSA)
 - defined, 207.01(1)
 - obligation of issuer, 207.01(5)
 - tax on investment that is not, 207.04
- Qualified labour expenditure (re Canadian film/video tax credit)**
 - defined, 125.4(1)
- Qualified non-resident**
 - defined, 115.2(1)
- Qualified pension income**
 - defined, 60.03(1), 118(7)
 - pension credit, 118(3)B(b)
- Qualified professional engineer or professional geoscientist**
 - defined, 127(9)
 - must certify critical mineral mining expenditure, 127(9)“flow-through critical mineral mining expenditure”(e)
- Qualified property**
 - defined
 - investment tax credit, 127(9), (11)
- Qualified REIT property**
 - defined, for SIFT trust and partnership distributions, 122.1(1)
- Qualified related corporation**
 - branch tax, 219(8)
 - non-resident insurer, of, 138(12)“qualified related corporation”
- Qualified relation**
 - Climate Action Incentive

Index

- Qualified relation (*cont'd*)
 - defined, 122.8(1)
 - GST credit
 - credit in respect of, 122.5(3)A(b)
 - defined, 122.5(1), 122.5(2)
- Qualified resource**
 - defined, for resource allowance claims, Reg. 1206(1)
- Qualified resource expense**
 - defined (for corporate inclusion of partnership income), 34.2(1)
- Qualified resource property**
 - defined, for Atlantic investment tax credit, 127(9)
 - excluded from qualified property, 127(9)“qualified property”
 - investment tax credit for, 127(9)“investment tax credit”(a)
- Qualified security**
 - defined, 260(1)
 - loan of, deemed dividend, 260(5.1)
- Qualified small business corporation**
 - capital gains exemption, *see* Qualified small business corporation share
 - share, *see* Qualified small business corporation share
- Qualified small business corporation share**
 - capital gains deduction, 110.6(2.1)
 - death of shareholder, 110.6(14)(g)
 - defined, 110.6(1)
 - deemed, where capital gain deemed following debt forgiveness, 80.03(8)
 - individual, of, defined, 108(1)“qualified small business corporation share”
 - related person, 110.6(14)
 - rules re, 110.6(14)
- Qualified small-business property**
 - defined, 127(9) [repealed]
 - investment tax credit for, 127(9)“specified percentage”(i)
- Qualified small business share**
 - excluded from mark-to-market rules, 142.2(1)“mark-to-market property”(e)
- Qualified tertiary oil recovery project, defined, Reg. 1206(1)**
- Qualified transportation equipment [repealed]**
 - defined, 127(9)
- Qualified trust**
 - defined, 259(3)
- Qualified trust unit**
 - defined, 260(1)
- Qualified zero-emission technology manufacturing activities**
 - credit for, 125.2(2)
 - defined, Reg. 5202
- Qualifying acquisition**
 - defined, for stock option deferral, 7(9)
- Qualifying active business**
 - defined, Reg. 5100(1)
- Qualifying amount**
 - defined, for retroactive spreading of lump-sum payments, 110.2(1)
- Qualifying annuity**
 - defined, for pooled registered pension plan rules, 147.5(1)
- Qualifying arrangement**
 - FHSA (first home savings account)
 - ceasing to be, 146.6(16)(a)(iii)
 - conditions for, 146.6(2)
 - defined, 146.6(1)
 - Quebec *Civil Code* usufruct rules
 - deemed to be trust in Quebec, 248(3)(b), (c)
 - defined, 248(3.2)
 - RRSP overcontribution
 - defined, 204.2(1.32)
 - TFSA (tax-free savings account)
 - ceasing to be, 146.2(5)(b)
 - conditions for, 146.2(2)
 - deemed not to be RSP, RIF, etc., 146.2(12)
 - defined, 146.2(1)
- Qualifying business, *see also* Non-qualifying business**
 - defined, for employee ownership trust, 248(1)
- Qualifying business transfer**
 - defined, for employee ownership trust, 248(1)
- Qualifying Canadian partnership**
 - defined, 15(2.14)(a)
 - exception to shareholder loan rules, 15(2.11)
- Qualifying competent authority agreement**
 - defined, for country-by-country reporting, 233.8(1)
- Qualifying contract**
 - for qualifying environmental trust, defined, 211.6(1)
- Qualifying corporation**
 - defined
 - for air quality improvement credit, 127.43(1)
 - for refundable investment tax credit, 127.1(2)
- Qualifying cost**
 - defined, for small business investment capital gain rollover, 44.1(1)
- Qualifying cost contribution arrangement**
 - defined, 247(1)
- Qualifying currency**
 - defined, for functional currency rules, 261(1)
- Qualifying disbursement**
 - defined, 149.1(1)
 - permitted to registered charity, 149.1(1)“charitable organization”(a.1), 149.1(1)“charitable purposes”, 149.1(2)(b), (c), (3)(b), (b.1), (4)(b), (b.1), (4.1)(d), (21)
- Qualifying disposition**
 - small business investment capital gain rollover
 - defined, 44.1(1), (9)
 - trusts
 - defined, 107.4(1)
 - rollover to trust, 107.4(3)
 - subsequent disposition by trust, 107.4(4)
- Qualifying dividend, 83(1), (6)**
- Qualifying educational program**
 - defined
 - for scholarships and pre-2017 education tax credit, 118.6(1)
 - for Lifelong Learning Plan withholding exemption, Reg. 104.1(2)
 - for Lifelong Learning program (loan from RRSP), 146.02(1)
 - for RESP, 146.1(1)
- Qualifying employee**
 - of employee ownership trust, 248(1)“employee ownership trust”(b)
- Qualifying entity**
 - defined
 - COVID-19 Canada Emergency Wage Subsidy, 125.7(1)
 - foreign retirement plan, contribution to, Reg. 6804(1)
 - upstream loan repaid by Aug. 2016, transitional setoff, 39(2.2)
- Qualifying environmental trust (*formerly Mining reclamation trust*)**
 - acquisition of, deduction, 20(1)(tt)
 - amalgamation of corporation, effect of, 87(2)(j.93)
 - beneficiary, credit to, 127.41
 - reduction in corporate beneficiary’s instalments, 157(3)(e)
 - contribution to, deduction, 20(1)(ss)
 - cost amount of interest in, 248(1)“cost amount”(e.2)
 - defined, 211.6(1), 248(1)
 - disposition of interest in, income, 12(1)(z.2)
 - income from, 12(1)(z.1)
 - tax on, 211.6

Index

- Qualifying exchange (LSVCC)**
 - defined, 211.7(1)
 - disposition of approved share, 211.8(1)
 - exchangeable shares, 211.7(3)
- Qualifying exchange (mutual fund rollover)**
 - defined, 132.2(2)
 - effect of, 132.2(1)
 - exemption from rules re disposition of income interest in trust, 106(2), (3)
- Qualifying expenditure**
 - for air quality improvement credit
 - defined, 127.43(1)
 - for home accessibility tax credit
 - defined, 118.041(1)
 - made by condominium corporation, co-op or trust, 118.041(2)
 - for Multigenerational Home Renovation Tax Credit
 - credit for, 122.92(3)B(b)
 - defined, 122.92(1)
 - made by trust, 122.92(2)
- Qualifying family member**
 - defined, for RDSP, 146.4(1)
- Qualifying foreign merger**
 - defined, for foreign banks, 142.7(1)
 - effect of, 142.7(2)
- Qualifying group plan amount [formerly “qualifying group RRSP premium”]**
 - defined, 204.2(1.31)
- Qualifying home**
 - for First-Time Home Buyer’s Credit and Disability Home Purchase Credit, 118.05(1)
 - for first home savings account, 146.6(1)
 - for RRSP withdrawals, 146.01(1)
- Qualifying homebuyer**
 - defined, Reg. 104(3.01)
- Qualifying income limit**
 - defined, for refundable ITC, 127.1(2)
- Qualifying incomes**
 - defined, for foreign tax credit, 126(7), (9)
- Qualifying indebtedness**
 - defined, for FAPI of banks, 95(2.43)
- Qualifying individual**
 - defined
 - for first home savings account, 146.6(1)
 - for home accessibility tax credit, 118.041(1)
 - for Multigenerational Home Renovation Tax Credit, 122.92(1)
 - for pension regulations (re approved downsizing program), Reg. 8505(2)(b), 8505(2.1)
 - for principal-residence exemption, 54“principal residence”(g)
- Qualifying interest (in respect of foreign affiliate)**
 - defined, 95(2)(m), 95(2.2)
 - income of foreign affiliate from active business, 95(2)(a)
- Qualifying journalism organization, *see also* Qualified Canadian journalism organization; Registered journalism organization**
 - defined
 - for donations and charity treatment, 149.1(1)
 - for refundable labour tax credit, 125.6(1)
- Qualifying labour expenditure**
 - defined, for journalism labour credit, 125.6(1)
- Qualifying law**
 - in respect of qualifying environmental trust, defined, 211.6(1)
- Qualifying liquidation and dissolution**
 - defined, 88(3.1)
- excluded from pregnant-loss rules, 13(21.2)(e)(iii)(E)(I)1, 14(12)(g)(i)(A) [before 2017], 18(15)(b)(iv)(A)(I), 40(3.4)(b)(v)(A)(I), 40(3.5)(c)(iii)
- Qualifying location**
 - defined, for air quality improvement credit, 127.43(1)
- Qualifying losses**
 - defined, for foreign tax credit, 126(7), (9)
- Qualifying member**
 - defined, FAPI rules, 95(2)(o)–(r), 248(1)
- Qualifying non-resident employee**
 - defined, for payroll withholding exemption, 153(6)
- Qualifying non-resident employer**
 - defined, for payroll withholding exemption, 153(6)
 - exemption from withholding on payment to qualifying non-resident employee, 153(1)(a)(ii)
- Qualifying obligation**
 - defined, Reg. 5100(1)
- Qualifying owner**
 - defined, 149(1)(d.6)
- Qualifying partial public health restriction**
 - Canada Emergency Recovery Benefit (CERB) adjustment, Reg. 8901.2(2)(b)(ii)
 - defined, Reg. 8901.2(0.1)
- Qualifying partnership**
 - defined (for corporate inclusion of partnership income shortfall), 34.3(1)
- Qualifying payment**
 - defined, Reg. 809(4)
- Qualifying performance income (for amateur athlete trust)**
 - defined, 143.1(1)
 - included in RRSP earned income, 146(1)“earned income”(b.2)
- Qualifying period**
 - defined
 - for air quality improvement credit, 127.43(1)
 - for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)
 - for phased retirement rules, Reg. 8503(16)
 - for SIFT trust wind-up event, 248(1)“SIFT trust wind-up event”(c)(ii)
- Qualifying person**
 - defined
 - re eligible funeral arrangement, 148.1(1)
 - re registered disability savings plan, 146.4(1)
 - re stock option rules, 7(7)
 - re treaty shopping, Canada-U.S. Tax Treaty:Art. XXIX-A:2
- Qualifying portion of a capital gain**
 - defined, for small business investment capital gain rollover, 44.1(1)
- Qualifying portion of a distribution**
 - defined, 207.01(1)“excess TFSA amount”E
- Qualifying portion of the proceeds of disposition**
 - defined, for small business investment capital gain rollover, 44.1(1)
- Qualifying property**
 - defined, for COVID-19 Canada Emergency Rent Subsidy, 125.7(1)
- Qualifying public health restriction**
 - defined, for Canada Emergency Wage Subsidy, 125.7(1)
- Qualifying recovery entity**
 - defined, for Canada Recovery Hiring Program, 125.7(1)
- Qualifying relation**
 - defined, for Multigenerational Home Renovation Tax Credit, 122.92(1)
- Qualifying renovation**
 - defined
 - for home accessibility tax credit, 118.041(1)
 - for Multigenerational Home Renovation Tax Credit, 122.92(1)

Qualifying rent expense

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

Qualifying renter

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

Qualifying retirement plan

- defined, Canada-U.S. Tax Treaty:Art. XVIII:15
- tax treatment of, Canada-U.S. Tax Treaty:Art. XVIII:8–17

Qualifying return of capital

- defined, for upstream loans, 90(3)
- reduction of ACB, 53(2)(b)(i)(B)(II)

Qualifying revenue

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

Qualifying services

- benefits in respect of, 94(1)“exempt foreign trust”(f)(ii)(C)
- defined, for non-resident trust rules, 94(1)

Qualifying share

- defined
- RRSP or RRIF investment in cooperative corporation, Reg. 4901(2)
- prescribed, Reg. 6203

Qualifying site

- in respect of qualifying environmental trust, defined, 211.6(1)

Qualifying student

- defined, 118.6(1)

Qualifying subscription expense

- credit for, 118.02(2)
- defined, 118.02(1)

Qualifying substitute corporation

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

Qualifying survivor

- defined, for pooled registered pension plan rules, 147.5(1)

Qualifying tourism or hospitality entity

- defined, for Canada Emergency Wage Subsidy, 125.7(1), Reg. 8901.1(2)

Qualifying transfer

- defined, for merger of segregated funds, 138.2(1)

Qualifying transfers

- re past service event, Reg. 8303(6), (6.1), Reg. 8304(2)(h)

Qualifying transitional income

- defined (for corporate inclusion of partnership income), 34.2(1)
- reserve, deduction for, 34.2(11)

Qualifying trust

- acquisition of shares for labour-sponsored funds tax credit, 127.4(3)
- defined, 127.4(1), 211.7(1)

Qualifying trust annuity

- attribution of amount paid out from, 75.2(a)
- joint and several liability, 160.2(2.1), (5)
- death of taxpayer, effect of, 75.2(b)
- defined, 60.011(2), 248(1)

Qualifying withdrawal

- defined
- for first home savings account (FHSA), 146.6(1)
- for registered pension plan past service event, Reg. 8307(3)

Quebec, see also Province

- application of civil law to federal Acts, *Interpretation Act* 8.1, 8.2
- *Environmental Quality Act*, trust required by, exempt, 149(1)(z.1)
- Gaspé, *see* Gaspé Peninsula
- gift of succession in, deemed to be release or surrender, 248(9)
- labour-sponsored venture capital corporation of
 - prescribed, Reg. 6700(a)(i), (vii)
- logging tax, credit for, 127(1), (2), Reg. 700

- matrimonial regime, 248(22), (23)
- Montreal, international banking centre until 2013, 33.1(3)
- northern, *see* Northern Canada
- Office de professions, dues deductible, 8(1)(i)(vii)
- Pension Plan, *see* Canada Pension Plan/Quebec Pension Plan
- qualifying arrangement, 248(3), (3.2)
- RRSP, RRIF, RDSP, RESP or TFSA set up in, deemed to be trust, 248(3)(c), 248(3.2)(d)
- renunciation of succession in, deemed to be disclaimed, 248(9)
- residents, federal tax abatement, 120(2)
- *Supplemental Pension Plans Act*, Reg. 8502(d)(ix), 8510(9)
- tax on failing to acquire replacement LSVCC share, matching federal tax, 211.81
- tax rates, *see* introductory pages
- usufructs, rights of use or habitation, and substitutions, deemed to be trusts, 248(3)

Quebec North Shore Paper Co. case overruled, 12(1)(r)**Quebec Parental Insurance Plan**

- deduction for premiums paid by self-employed person, 8(1)(1.2)
- benefit
 - repayment of overpayment, deduction for, 60(n)(v.1)
 - taxable, 56(1)(a)(vii)
 - withholding tax, 153(1)(d.1)
- premium
 - paid by employee
 - as employee
 - credit, 118.7:B(a.1), (a.2)
 - deduction, 60(g)
 - as employer, deduction, 8(1)(1.2)
 - paid by employer, deduction, 9(1) (general accounting principles)

Quebec Pension Plan, see Canada Pension Plan/Quebec Pension Plan**Quebec sales tax, see also Goods and services tax (GST)**

- input tax refund or deemed to be assistance, 248(16.1), *see also* Assistance/government assistance
- repaid, deemed to be reduction in assistance, 248(18.1)
- rebate
 - deemed to be assistance, 248(16.1), *see also* Assistance/government assistance
- included in income, 12(1)(x)
- reduces capital cost of property, 13(7.1)

Queen, see Crown**Quota**

- disbursement, for charities, *see* Disbursement quota (of charity)
- farm, capital gains exemption, 110.6(1)“qualified farm property”(d)
- fishing, capital gains exemption, 110.6(1)“qualified fishing property”(d)

R**R&D, see Scientific research and experimental development****RCA, see Retirement compensation arrangement****RCA strip**

- constitutes advantage, 207.5(1)“advantage”(d)
- defined, 207.5(1)
- 100% tax on, 207.62(2)(c)

RCA trust

- defined, 207.5(1)
- excluded from various trust rules, 108(1)“trust”(d)

RCAAAA, see Registered Canadian amateur athletic association**RCGTOH, see Refundable capital gains tax on hand****RCMP, see Royal Canadian Mounted Police****RDSP, see also Registered disability savings plan (RDSP)**

- defined, 146.4(1)“registered disability savings plan”, 248(1)“registered disability savings plan”

RDTOH, see Refundable dividend tax on hand

- REIT**, *see* Real estate investment trust
- REMIC**, *see* Real Estate Mortgage Investment Conduit
- REOP**, *see* Reasonable expectation of profit
- RESP**, *see also* Registered education savings plan
- defined, 146.1(1)“registered education savings plan”, 248(1)“registered education savings plan”
- RESP annual limit**
- defined, 146.1(1)
 - limit on RESP contributions, 146.1(2)(k)
 - penalty tax on exceeding limit, 204.9(1)“excess amount”(a)
- RESP lifetime limit**
- defined, 204.9
- RFI**, *see* Restricted financial institution
- RHOSP**, *see* Registered home ownership savings plan
- RIC**, *see* Regulated Investment Company (U.S.)
- RIF**, *see* Retirement income fund
- RIFE**, *see* Restricted interest and financing expense
- RJO**, *see* Registered journalism organization
- RLSVCC**, *see* Labour-sponsored venture capital corporation (LSVCC): registered
- RPE**, *see* Ratio of permissible expenses
- RPO**, *see* Reporting platform operator
- RPP**, *see* Registered pension plan
- RPP annuity contract**, 147.4
- RRIF**, *see also* Registered retirement income fund
- defined, 248(1)“registered retirement income fund”
- RRIF strip**, *see* RRSP strip
- RRSP**, *see also* Registered retirement savings plan
- defined, 248(1)“registered retirement savings plan”
 - depositary
 - conditions for registration, 146(2)(c.3)
 - defined, 146(1)“retirement savings plan”(b)(iii)
 - exempt from tax on amounts added or earned, 146(20)
 - income inclusion on death, 146(1)“tax-paid amount”(b), 146(8.8), (8.9)
 - exempt from tax on income
 - depositary RRSP, 146(20)
 - trust RRSP, 146(4), 149(1)(r)
 - strip, *see* RRSP strip
- RRSP strip**, *see* Registered plan strip
- R.S.C. 1985 (5th Supp.)**, *see* Revised Statutes of Canada, 1985 (5th Supp.)
- RSFT**, *see* Related segregated fund trust
- RSO**, *see* Refund Set-Off program
- RSP**, *see* Retirement savings plan
- Rabbi**, *see* Clergy
- Radar equipment**
- capital cost allowance for, Reg. Sch. II:Cl. 9
- Radiocommunication equipment**
- capital cost allowance for, Reg. Sch. II:Cl. 8, Sch. II:Cl. 9
 - defined, *Interpretation Act* 35(1)
- Radiological services**
- medical expense, 118.2(2)(o)
- Rail bogies or rail suspension devices**
- capital cost allowance, Reg. 1100(1)(z), Reg. Sch. II:Cl. 35(b)
- Railroad Retirement Act (U.S.)**
- Tier 1 benefits, Canada-U.S. Tax Treaty:Art. XVIII:5
- Railway**
- cars, capital cost allowance, Reg. 1100(1)(z), (z.1b), (z.1c), Reg. Sch. II:Cl. 7(h)(ii), Sch. II:Cl. 35
 - separate classes, Reg. 1101(5d)–(5d.2)
 - common carrier, *see* companies (below)
 - companies
 - capital cost allowance, Reg. 1100(1)(z.1c), 1101(5d.2), Reg. Sch. II:Cl. 7, 35
 - corporations, taxable income earned in a province, Reg. 406
 - cross-border, profits exempt, Canada-U.S. Tax Treaty:Art. VIII:4
 - employees
 - away-from-home expenses of, deduction, 8(1)(e), (g)
 - relieving telegrapher or station agent expenses, 8(1)(e)
 - U.S. retirement benefits, Canada-U.S. Tax Treaty:Art. XVIII:5
 - expansion property, Reg. 1100(1)(zc)
 - locomotive, capital cost allowance, Reg. Sch. II:Cl. 6(j), Sch. II:Cl. 7(i), Sch. II:Cl. 10(y)
 - refurbishing or reconditioning, Reg. 1102(19.1), (19.2)
 - modernization property, Reg. 1100(1)(zc)
 - rail suspension device, capital cost allowance, Reg. 1100(1)(z), (z.1b), Reg. Sch. II:Cl. 7(i), Sch. II:Cl. 35
 - separate classes, Reg. 1101(5d)–(5d.2)
 - rolling stock, exempt from non-resident tax, 212(1)(d)(vii), 212(16)
 - sidings, capital cost allowance, Reg. 1100(8)
 - systems, Reg. 1104(2), Reg. Sch. II:Cl. 4
 - tank car, capital cost allowance, Reg. Sch. II:Cl. 6
 - tier 1 pension benefits, Canada-U.S. Tax Treaty:Art. XVIII:5
 - U.S. resident, exempt, Canada-U.S. Tax Treaty:Art. XV:3
 - track and related property, capital cost allowance, Reg. 1100(1)(zb), Reg. Sch. II:Cl. 1(h)
 - for mine, Reg. Sch. II:Cl. 10(m), Sch. II:Cl. 41
 - separate classes, Reg. 1101(5e), (5e.1)
 - traffic control equipment, capital cost allowance, Reg. 1100(1)(za.1), Reg. Sch. II:Cl. 1(i)
 - separate classes, Reg. 1101(5e.1)
 - trestles, Reg. 1100(1)(za.2), (zb), Reg. Sch. II:Cl. 3
 - separate classes, Reg. 1101(5e.2), (5f)
- Railway system**
- defined, Reg. 1104(2)
- Rapid transit car**
- capital cost allowance for, Reg. Sch. II:Cl. 8
- Rapidly depreciating electronic equipment**
- capital cost allowance, Reg. 1101(5p), Reg. Sch. II:Cl. 10(f)
- Rare earth element**, *see* Critical mineral
- Rate reduction for zero-emission technology manufacturing**, 125.2
- Rate reduction payment**
- treated as interest, 18(9.1)
- Rates of capital cost allowance**, Reg. 1100
- Rates of tax**, *see also* Surtax
- alternative minimum tax, 127.51
 - capital tax, financial institutions, 190.1
 - corporation, 123
 - abatement, 124
 - deposit insurance, 137.1(9)
 - excessive election, 184(2)
 - investment corporations, 130
 - manufacturing and processing, 125.1
 - non-resident, carrying on business in Canada, 219
 - personal services business, 123.4(1)“full rate taxable income”(a)(iii), 123.5
 - small business deduction, 125
 - surtax (before 2008), 123.2
 - DPSP trust
 - non-qualified investments, on, 198
 - deposit insurance corporation, 137.1(9)
 - income-splitting tax, 120.4(2)
 - individual, 117(2)
 - abatement for provincial schooling allowance, 120(2)
 - averaging, *see* Averaging of income
 - general averaging
 - surtax, 180.1

Index

Rates of tax (*cont'd*)

- income not earned in a province, 120(1)
- indexing of, 117.1
- over-contributions to deferred plans, 204.1
- investment corporation, 130(1)
- investment income of life insurer, 211.1(1)
- minimum tax, 127.51
- non-resident withholding tax, 212
- Part I (regular tax)
 - corporation, 123(1)(a), 124(1)
 - deposit insurance corporation, 137.1(9)
 - general reduction, 123.4(2)
 - reduction for CCPC, 123.4(3), 125
 - surtax (before 2008), 123.2
 - income not earned in a province, 120(1)
 - income splitting tax, 120.4(2)
 - individual, 117(2)
 - minimum tax, 120.4(2)
- Part I.1 (individual surtax), 180.1(1)
- Part I.2 (OAS clawback), 180.2(2)
- Part I.3 (Large Corporations Tax) [pre-2006], 181.1(1)
- Part II (tobacco manufacturers' surtax), 182(1)
- Part II.1 (corporate distributions tax), 183.1(2)
- Part II.2 (stock buyback tax), 183.3(2)
- Part III (excessive capital dividend election), 184(2)
- Part III.1 (excessive eligible dividend election), 185.1(1)(a), (b)
- Part IV (dividends received by private corporation), 186(1)
- Part IV.1 (preferred shares), 187.2
- Part V
 - charity revocation tax, 188(1.1)
 - charitable foundation, transfer of property, 188(3)
 - private foundation, non-qualified investments, 189(1)
- Part VI (financial institutions capital tax), 190.1(1)
- Part VI.1 (preferred shares), 191.1(1)
- Part VI.2 tax (banks and life insurers, for 2022), 191.5(2)
- Part IX (cumulative offset account), 196(1)
- Part IX.1, 197(2)
- Part X
 - DPSP, inadequate consideration, 201
 - DPSP, non-qualified investments or use of assets as security, 198(1)
- Part X.1
 - DPSP with excess amount, 204.1(3)
 - RRSP overcontributions, 204.1(2.1)
- Part X.2 (registered investment holding non-prescribed investment), 204.6(1)
- Part X.3 (labour-sponsored fund insufficiently invested), 204.82(1), (3)
- Part X.4 (overcontribution to RESP), 204.91
- Part XI.01
 - advantage extended in relation to RRSP, RRIF, TFSA, RESP or RDSP, 207.05(2)
 - excess FHSA contributions, 207.021
 - excess TFSA contributions, 207.02
 - non-resident contributions to TFSA, 207.03
 - RRSP, RRIF, TFSA, RESP or RDSP holding prohibited or non-qualified investment, 207.04(2), (7)
- Part XI.1
 - DPSP holding non-qualified investment, 207.1(2)
 - RESP holding non-qualified investment, 207.1(3)
- Part XI.2 (disposition of cultural property by institution), 207.3
- Part XI.3 (retirement compensation arrangement), 207.7(1)
- Part XI.4 (employees profit sharing plan), 207.8(2)
- Part XI.5 (ELHT owning share or debt of participating employer), 207.9(3)
- Part XII.1 (carved-out income), 209(2)
- Part XII.2 tax (designated income of certain trusts), 210.2(1), (2)
- Part XII.3 (investment income of life insurer), 211.1(1)

- Part XII.4 (qualifying environmental trust), 211.6(2)
- Part XII.5 (recovery of LSVCC credit), 211.8(1), 211.81
- Part XIII (withholding tax)
 - dividends paid to non-residents, 212(2) (as reduced by treaty)
 - film and video royalties, 212(5) (as reduced by treaty)
 - other passive income of non-residents, 212(1) (as reduced by treaty)
- Part XIII.1 (foreign bank), 218.2(1) (as reduced by treaty)
- Part XIII.2, 211.2(2)(b)
- Part XIV
 - branch tax, 219(1) (as reduced by treaty)
 - corporate emigration, 219.1
 - registered charities, 188
 - registered investments, re, 204.4
 - trust, 122(1)

Ratio of permissible expenses

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

Reacquired property, ITAR 26(6)

Reading services

- disability supports deduction, 64(a)A(ii)(L)
- medical expense credit, 118.2(2)(1.43)

Real estate, *see* Real property

Real estate investment trust, *see also* Mutual fund trust

- allowed as mutual fund trust, 108(2)(b)(ii)(B), 108(2)(c), 132(6)(b)(ii)
- defined, for SIFT trust and partnership distributions, 122.1(1)
 - for stapled-security rules, 18.3(1), 122.1(1)
- excluded from income tax distributions tax, 122.1(1)“SIFT trust”
- tax on buying back units, 183.3(1)“covered entity”(b)(ii)(A), 183.3(2)
- United States
 - dividends paid by, Canada-U.S. Tax Treaty:Art. X:7(c)

Real Estate Mortgage Investment Conduit

- excess inclusion, Canada-U.S. Tax Treaty:Art. XI:9

Real or immovable property

- defined, for SIFT trust and partnership distributions, 122.1(1)

Real property, *see also* Building; Land; Real or immovable property; Rent

- acquired
 - capital cost, 13(5.2)
 - capital, taxable, Canada-U.S. Tax Treaty:Art. XXIII
 - defined, *Income Tax Conventions Interpretation Act* s. 5
 - disposed of
 - non-resident, by, 216(5)
 - recaptured depreciation, 13(5.3)
 - donation after sale of, capital gain exempt, 38(a.4), 38.3, 38.4 (abandoned)
 - income from, Canada-U.S. Tax Treaty:Art. VI
 - interest in, defined, 248(4)
 - leasehold interest in, *see* Leasehold interest
 - life estate in, 43.1
 - non-qualifying real property, defined, 110.6(1)
 - outside Canada
 - foreign tax credit to emigrant on disposition, 126(2.21)
 - foreign tax credit to trust, 126(2.21)
 - reporting of to CRA, 233.3
 - principal-business corporations
 - associated, base level deduction, 18(2.3)–(2.5)
 - base level deduction, 18(2)(f), 18(2.2)
 - rent paid before acquisition, deemed CCA, 13(5.2)
 - trust owing, whether a unit trust, 108(2)(c)

Real right in an immovable

- meaning of, 248(4.1)

Real-time captioning services, *see* Captioning services

Reality television

- ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(vii)
- ineligible for film/video production services credit, Reg. 9300(2)(g)

Reappropriations of amounts, 221.2**Reasonable efforts**

- to determine transfer prices
- defined, 247(4)
- required, 247(3)(a)(ii)(B)

Reasonable expectation of profit

- not required to deduct loss from business or property, 9(2) (Notes)
- personal or living expenses, 18(1)(h), 248(1)
- required for loss carryforward after change in control, 111(5)(a)(i), 111(5)(b)(i)

Reasonable return

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

Reasonableness

- criterion for expenses, 67

Reassessment, *see also* Assessment

- after normal reassessment period, 152(4)–(5)
- disposition of vessel, after, 13(18)
- consequential on other change, 152(4.3)
- constitutes an assessment, 248(1)“assessment”
- deceased’s estate, election re losses, 152(6)
- election to capitalize interest, on, 21(5)
- exercise of option, on, 49(4), (5)
- extended reassessment period, 152(4)(b)
- Minister, by, 152(4), (4.1), (6), 165(3)
- after filing notice of objection, 165(5)
- disposing of appeal, on consent, 169(3)
- normal reassessment period, defined, 152(3.1)
- second notice of objection not required, 165(7)
- time for, 152(4), 231.8
- time to object to, 165(1)
- unused Part I.3 tax credit, 152(6)(f)
- validity, 165(5), (6)
- waiver of limitation period by taxpayer, 152(4)(a)(ii), 152(4)(c)
- within normal reassessment period, 152(4)

Recapture, *see also* Clawback; Negative amounts

- capital cost allowance, *see* Capital cost allowance: recapture
- eligible capital property, 14(1) [before 2017]
- goodwill, 14(1) [before 2017]
- investment tax credit, 127(27)–(36)
- SR&ED expenditures, 37(6)

Receivables

- in later year, reserve for, 20(1)(n), 20(8)
- where property repossessed by creditor, 79.1(4)
- 1971, ITAR 23(5)“1971 receivables”

Received capacity

- adds room for carryforward of denied interest expenses, 111(1)(a.1)B
- defined, for interest deduction restrictions, 18.2(1), (4)
- reduces limitation on interest expense, 18.2(2)D

Receiver or receiver-manager, *see also* Legal representative

- clearance certificate before distributing property, 159(2)
- deemed to be legal representative, 248(1)“legal representative”
- obligations of, 159
- return to be filed, 150(3)
- withholding tax, liability for, 227(5), 227(5.1)

Recipient

- defined, for hybrid mismatch arrangement rules, 18.4(1)
- multiple recipients, 18.4(19)

Reclamation obligations

- no reserve for, 20(7)(d)

Reclamation of mines, *see* Qualifying environmental trust**Reclassification**

- depreciable property, change in class, 13(5)
- expenditures, R&D claims, 37(12)

Recognized derivatives exchange

- defined, for synthetic equity arrangement rules, 248(1)

Recognized forestry professional

- defined, Reg. 7400(3)

Recognized stock exchange

- defined, 248(1)

Record, *see also* Books and records

- defined, 248(1)

Record suspension

- defined, 149.1(1.01)
- effect on entitlement to operate charity, 149.1(1)“ineligible individual”(a)(ii)

Recovery

- labour-sponsored funds tax credit, *see* Labour-sponsored funds tax credit: recovery
- limit, *see* Recovery limit

Recovery limit

- defined, for non-resident trusts, 94(8)

Recovery wage subsidy rate

- defined, for Canada Recovery Hiring Program, 125.7(1)

Recreation program

- youth boarding allowance non-taxable, 6(1)(b)(v.1)

Recreation vehicle service technician

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

Recreational club

- non-profit, exempt, 149(1)(l), 149(5)

Recreational facilities

- use of, expense not deductible, 18(1)(l)(i)

Recreational program for children, *see* Children’s Arts Tax Credit (pre-2017)**Recreational property**

- capital cost allowance, Reg. 1102(17)

Rectification, 169(1) (Notes)**Record suspension**

- defined, 149.1(1.01)
- effect on entitlement to operate charity, 149.1(1)“ineligible individual”(a)(ii)

Red Seal trades

- prescribed, for apprenticeship credit, Reg. 7310

Redeeming entity

- defined, 135.1(7)

Redemption of shares by corporation

- capital loss denied, 40(3.6)
- deemed dividend of excess over paid-up capital, 84(3)

Redetermination, *see* Determination**Reduction of tax**, *see* Abatement of tax**Reed Stenhouse Companies Ltd.**

- Class I shares, no deemed dividend on redemption, 84(8), Reg. 6206

Reference security

- defined, 18.3(1)“stapled security”(a)

Refinery

- capital cost allowance, Reg. Sch. II:Cl. 10(u), Sch. II:Cl. 41

Refrigeration and air conditioning mechanic

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

Refugee

- entitled to Canada Child Benefit, 122.6“eligible individual”(e)(iii)

Refund

- after normal reassessment period, 152(4.2), 164(1.5)

Index

Refund (*cont'd*)

- assignment of, by corporation, 220(6), (7)
- capital gains
 - mutual fund corporation, to, 131(2), (3)
 - mutual fund trust, to, 132(1), (2)
- Crown royalty, income inclusion, 12(1)(x.2)
- dividend
 - mutual fund corporation, to, 131(5)
 - private corporation, to, 129(1)
- duty of Minister, 164(4.1)
- employees profit sharing plan, to former beneficiary, 144(9)
- fraudulently obtained, offence, 239(1.1)
- included in income, 12(1)(x)(iv)
- interest on, 164(3)–(4)
- labour-sponsored funds tax credit clawback, 211.82
- non-resident tax, of, 227(6)–(7)
- of payments, *see* Refund of payments
- overpayment of tax, of, 164
 - application to other taxes, 164(2)
- Part I tax, 164
- partial refundable investment tax credit re scientific research and development, 164(1)
- premiums, of, *see* Registered retirement savings plan: refund of premiums
- provincial portion of income tax, 164(1.4)
- RRSP premiums, of, 146(1)“refund of premiums”
 - deemed receipt of, 146(8.1)
- reassessment to give rise to, 152(4.2)
- refundable dividend tax, 129
 - application to other liability, 129(2)
- repayment on objections and appeals, 164(1.1)
- returns must be filed before payable by Minister, 164(2.01)
- tax, of
 - deferred profit sharing plan, to, 202(2)
 - application to other taxes, 203
 - excessive, 160.1(1)
 - tax on non-qualified investment, of
 - on disposition, 198(4), 199(2)
 - on recovery of security, 198(5)

Refund benefit

- defined, Reg. 8300(1)

Refund interest

- defined
 - for M&P credit on resource income, Reg. 5203(4)
 - for corporate interest offset, 161.1(1)
- payable to taxpayer, 164(3)
- rate of interest, Reg. 4301(b)

Refund of payments

- defined, for education savings plan, 146.1(1)

Refund of premiums, *see* Registered retirement savings plan: refund of premiums

Refund Set-Off program, 164(2)

Refundable capital gains tax on hand

- mutual fund corporation, of, 131(6)“refundable capital gains tax on hand”
 - carryover to mutual fund trust on qualifying exchange, 132.2(3)(i)
 - reduction of, 131(9)
- mutual fund trust of, 132(4)“refundable capital gains tax on hand”
 - addition to following reorganization, 132.2(3)(i)

Refundable credits

- Air Quality Improvement Tax Credit, 127.43
- CCUS credit, 127.44
- Canada Child Benefit, 122.61(1)
- Canada Training Credit, 122.91
- Canada Workers Benefit (former Working Income Tax Benefit), 122.7

- Canadian film/video production credit, 125.4
- carbon capture, use and storage credit, 127.44
- carbon tax rebate
 - for farmers, 127.42
 - generally, 122.8
- child fitness credit (2015-2016), 122.8
- Climate Action Incentive, 122.8
- dividend refund, 129(1)
- film or video production services credit, 125.5
- GST credit, 122.5(3)
- greenhouse gas tax rebate, 122.8
- individual resident in Quebec, 120(2)
- investment tax credit, 127.1(1)
- journalism labour credit, 125.6
- medical expenses, 122.51
- Multigenerational Home Renovation Tax Credit, 122.92
- qualifying environmental trust credit, 127.41(3)
- school supplies tax credit, 122.9
- U.S. social security tax adjustment due to treaty amendment, Canada-U.S. Tax Treaty:Art. XVIII:5

Refundable dividend tax on hand, *see also* Dividend refund

- aggregate investment income, defined, 129(4), 248(1)
- amalgamation, on, 87(2)(aa)
- deemed, 186(5)
- defined, 129(3) [repealed], 129(4)“eligible refundable dividend tax on hand”, “non-eligible refundable dividend tax on hand”
- foreign investment income, defined, 129(4)
- “income” or “loss” defined, 129(4)
- meaning of certain expressions, 129(8)
- parent’s, after subsidiary wound up, 87(2)(aa), 88(1)(e.2)
- refund of, 129(1)
- taxable dividend, defined, 129(7)

Refundable federal sales tax credit, 122.4 [repealed]

Refundable goods and services tax credit, 122.5, *see also* Goods and services tax (GST): refundable credit

Refundable investment tax credit

- deemed deduction from tax otherwise payable, 127.1(3)
- defined, 127.1(2)
- partial refund in respect of, 164(1)

Refundable medical expense credit, 122.51

Refundable Part IV tax, 186

- refund of, 129(1)

Refundable Part VII tax

- defined, 192(3), 248(1)

Refundable Part VIII tax on hand

- defined, 194(3), 248(1)

Refundable taxes

- investment income of CCPC, 123.3, *see also* Dividend refund
- Part IV tax, 186(1)
- prohibited investments for RRSP, RRIF, TFSA, RESP or RDSP, 207.04
- retirement compensation arrangement arrangement, 207.5(1)

Registered animal

- defined, Reg. 1802(5)

Registered Canadian amateur athletic association

- business activities of, 149.1(6.01)
- constitutes qualified donee for donations, 149.1(1)“qualified donee”(c)
- defined, 248(1)
- donation to, 149.1(1)“qualified donee”(c)
 - by corporation, deduction, 110.1(1)(a)
 - by individual, tax credit, 118.1(1)“total charitable gifts”
- exempt from tax, 149(1)(g)
- gift to, *see* donation to (above)
- information return required from, 149.1(14)
- penalties, 188.1

Index

- Registered Canadian amateur athletic association (*cont'd*)
 - • penalty reduced by giving funds to another RCAA, 188(1.4), 189(6.3)
 - political activities of, 149.1(6.201)
 - public disclosure of information about, 149.1(15), 241(3.2)
 - receipts, Reg. 3500, 3501
 - records to be kept, 230(2)
 - refusal by CRA to register, 149.1(22)
 - • appeal from, 172(3)(a)
 - • objection to, 168(4)
 - revocation of registration, 149.1(4.2), 168
 - • appeal from, 172(3)(a)
 - • objection to, 168(4)
 - suspension of receipting privileges, 188.2(1)
- Registered charity**, *see also* Charity
 - accumulation of property, 149.1(8), (9)
 - annulment of registration, *see* registration (below)
 - bequest to, *see* Enduring property [repealed]
 - books and records, 230(2)
 - charitable activities, *see* Charitable activities
 - communication of information by Minister, 149.1(15)
 - constitutes qualified donee for donations, 149.1(1)“qualified donee”(b)
 - controlled by person with criminal record, *see* Ineligible individual
 - corporate tax return not required, 150(1.1)(a)
 - criminal offence by director, *see* Ineligible individual
 - defined, 248(1)
 - designation as foundation or organization, 149.1(6.3)
 - • objection to, 168(4)
 - designation of, by Minister, as public foundation etc., 149.1(6.3)
 - • appeal from, 172(3)(a.1)
 - director committing offence, *see* Ineligible individual
 - disbursement excess, 149.1(20)
 - • defined, 149.1(21)
 - disbursement quota, *see* Disbursement quota (of charity)
 - donations to, *see* Gifts and donations (charitable)
 - employee of, penalty for false statement in receipt, 188.1(9), (10)
 - endowment to, *see* Enduring property [repealed]
 - exemption for, 149(1)(f)
 - false statement to obtain registration, revocation, 149.1(4.1)(c)
 - fund-raising event
 - • exempted from general limitation on entertainment expense deduction, 67.1(2)(b)
 - gift to another registered charity
 - • revocation of registration, 149.1(4.1)
 - gifts to, 118.1(1), (3)
 - information returns, 149.1(14), Reg. 204(3)(c)
 - investment assets, disbursement requirement, *see* Disbursement quota (of charity)
 - loan to donor, 118.1(16)
 - non-qualified investment, tax re, 189
 - officer of, penalty for false statement in receipt, 188.1(9), (10)
 - option granted to, 110.1(10)–(13), 118.1(21)–(24)
 - partnership look-through rule, 149.1(11)
 - penalties, 188.1, 189(6.3)
 - • appeal of penalty, 189(8), 169(1)
 - • carrying on business, 188.1(2)
 - • conferring undue benefit on any person, 188.1(4), (5)
 - • failing to file information return, 188.1(6)
 - • false statement in receipt, 188.1(9), 10
 - • foundation acquiring control of corporation, 188.1(3)
 - • incorrect receipt, 188.1(7)–(10)
 - • making gift to delay charitable expenditures, 188.1(11)
 - • objection to penalty, 189(8), 165(1)
 - • penalty reduced by giving funds to another charity, 189(6.3)
 - • penalty taxes, 188, 189
 - political activities of, *see* Political activity
 - public information return, 149.1(14), (15)
 - receipts issued by
 - • penalty for incorrect or false information, 188.1(7)–(10)
 - • revocation for incorrect or false information, 168(1)(d)
 - requirements, Reg. 3501
 - registration of, 248(1)“registered charity”
 - • annulment of registration, 149.1(23), (24)
 - • • appeal from, 172(3)
 - • • objection to, 168(4)
 - • refusal by Minister to register, 149.1(22)
 - • • appeal from, 172(3)
 - • • objection to, 168(4)
 - • revocation of, 149.1(2)–(4.1), 168
 - • • appeal from, 172(3)
 - • • deemed year-end, 188(1)
 - • • grounds for, 149.1(2)–(4.1), 168
 - • • objection to, 168(4)
 - • • returns required, 189(6.1)
 - • • tax on, 188(1.1)
 - • • • reduction of revocation tax liability, 189(6.2)
 - remainder interest in real property, disposition to, 43.1(1)
 - returning gift to donor, 110.1(14)–(17), 118.1(25)–(28), Reg. 3501.1
 - • specified gift, defined, 149.1(1)
 - • suspension of receipting privileges, 188.2
 - • • appeal of suspension, 189(8), 169(1)
 - • • objection to suspension, 189(8), 165(1)
 - • tax re, 188, 189
 - • taxation year, 149.1(1)
 - • ten-year gift to, *see* Enduring property [repealed]
 - • terrorism, supporting, *see* Charities Registration (*Security Information*) Act
 - • transfer of property
 - • • tax on, 188(3), (4)
- Registered disability savings plan (RDSP)**, 146.4
 - advantage, 207.01(1)“advantage”, 207.05
 - attribution rules do not apply, 74.5(12)(a.2)
 - cessation of eligibility for disability tax credit
 - • RDSP can stay open indefinitely, 146.4(4)(p)(ii)
 - conditions, 146.4(2)–(4)
 - defined, 146.4(1)
 - disposition of property to, capital loss nil, 40(2)(g)(iv)(A)
 - election on ceasing to be DTC-eligible, 146.4(4.1), (4.2)
 - emigration from Canada, no tax on, 128.1(10)“excluded right or interest”(a)(iii.1)
 - exempt from tax, 146.4(5)
 - holder of, *see* Holder
 - information return
 - • required for payments to non-residents, Reg. 202(2)(n)
 - • required for payments to residents, Reg. 200(1)
 - • whether required for RDSP, Reg. 204(3)(g)
 - interest on money borrowed for, not deductible, 18(11)(i)
 - issuer extending advantage, 207.01(1)“advantage”
 - non-compliant, 146.4(10)–(12)
 - non-qualified investment
 - • defined, 207.01(1)
 - • tax on, 207.04
 - payment from
 - • not counted for purposes of Canada Child Benefit, 122.6“adjusted income”
 - • not counted for purposes of GST/HST Credit, 122.5(1)“adjusted income”
 - • not counted for purposes of Old Age Security clawback, 180.2(1)“adjusted income”
 - • tax on, 56(1)(q.1), 146.4(6)
 - • withholding tax
 - • • non-resident, 212(1)(r.1)
 - • • resident, 153(1)(i), Reg. 103.1

Index

- Registered disability savings plan (RDSP) (*cont'd*)
- prohibited investment, tax on, 207.04
 - qualifying family member
 - becoming holder of RDSP, 146.4(1)“disability savings plan”(a)(ii)(B.1), (B.2)
 - defined, 146.4(1)
 - rules governing, 146.4(1.5)–(1.7)
 - Quebec, in, deemed to be trust, 248(3)(c)
 - reversionary trust rules do not apply, 75(3)(a)
 - rollover to
 - from RRSP, RRIF or RPP, 60.02
 - RESP investment income, 146.1(1.1), (1.2)
 - shortened life expectancy rules, 146.4(1.1)–(1.4)
 - tax payable by
 - borrowing money, 146.4(5)(a)
 - carrying on business, 146.4(5)(b)
 - non-qualified investments, 146.4(5)(b)
 - on acquisition of shares not at fair market value, 207.1(5)
 - on non-qualified or prohibited investment, 207.04
 - transfer to another RDSP, 146.4(8), (9)
 - withholding, *see* payment from (above)
- Registered education savings plan**, 146.1, *see also* Education savings plan
- accumulated income payment
 - defined, 146.1(1)
 - included in income, 146.1(7.1)
 - restrictions on making, 146.1(2)(d.1)
 - rollover to registered disability savings plan, 146.1(1.1), (1.2)
 - advantage, 207.01(1)“advantage”, 207.05
 - amendments to, 146.1(4.1)
 - amounts received, income, 56(1)(q)
 - annual limit, *see* RESP annual limit
 - annuities, holding of, 146.1(1)“qualified investment”(c)
 - beneficiary under
 - amount included in income, 146.1(7)
 - defined, 146.1(1)
 - conditions for registrations, 146.1(2)
 - contribution limits, *see* RESP annual limit; RESP lifetime limit
 - defined, 146.1(1)
 - distance education programs, 146.1(2)(g.1)
 - educational assistance payment, *see* Educational assistance payment
 - emigration of beneficiary, no deemed disposition, 128.1(10)“excluded right or interest”(a)(iii)
 - “excess amount” defined, 204.9(1), (2)
 - excluded amount, 146.1(7.2)
 - excluded from various trust rules, 108(1)“trust”(a)
 - family plan, 146.1(2)(j)
 - information returns
 - by promoters, 146.1(15)
 - by trustees, 146.1(13.1)
 - interest on money borrowed to contribute to, not deductible, 18(11)(h)
 - locked-in annuities, 146.1(1)“qualified investment”(c)
 - money borrowed for contribution to
 - limitation on deductibility, 18(11)(g)
 - non-qualified investment
 - defined, 207.01(1)
 - tax on acquiring, 207.04
 - tax on holding before 2017, 207.1(3)
 - notice of intent to revoke registration, 146.1(12.1)
 - appeal from, 172(3)(e.1)
 - notice of revocation, 146.1(12.2)
 - notification to beneficiaries, 146.1(2)(l)
 - overcontributions to, tax on, 204.9–204.93 (Part X.4)
 - payments out of
 - non-residents, to, 212(1)(r)
 - residents, to, 56(1)(q), 146.1(7)
 - prohibited investment, tax on, 207.04
 - promoter extending advantage, 207.01(1)“advantage”
 - qualified investment
 - defined, 146.1(1)
 - holding non-qualified investment
 - revocation of plan, 146.1(2.1), (12.1)
 - tax on, 207.1(3)
 - Quebec, in, deemed to be trust, 248(3)(c)
 - refund of payments under, 146.1(1)
 - registration
 - conditions for, 146.1(2)
 - deemed date of, 146.1(12)
 - revocation of, 146.1(12.1), (12.2), (13), (14)
 - reversionary trust rules do not apply, 75(3)(a)
 - revocable, 146.1(2.1)
 - revocation, 146.1(13)
 - notice of, 146.1(12.1), (12.2)
 - rollover of investment income to RDSP, 146.1(1.1), (1.2)
 - subscriber not taxable, 146.1(6)
 - tax payable by
 - on acquisition of shares not at fair market value, 207.1(5)
 - on non-qualified or prohibited investment, 207.04
 - tax payable by subscribers, 204.91
 - transfer of property to another plan, 146.1(2)(g.2), (j)(ii)(B), 146.1(6.1), 204.9(5)
 - trust
 - rollover to new trust, 248(1)“disposition”(f)(vi)
 - trust not taxable, 146.1(5), 149(1)(u)
 - withholding of tax from payments, 153(1)(t), Reg. 103(6)(g), 103(8)
- Registered home ownership savings plan**, 146.2 [repealed]
- Registered investment**
- defined, 204.4(1), 248(1)
 - list of, 204.5
 - Minister and, 204.4(2)–(5), 204.5
 - qualifies for RDSP or RESP, Reg. 4900(5)
 - tax on
 - on acquisition of shares not at fair market value, 207.1(5)
 - on holding certain property, 204.6
- Registered journalism organization**, *see also* Qualified Canadian journalism organization; Qualifying journalism organization
- defined, 248(1)
 - exempt from tax, 149(1)(h)
 - information return required, 149.1(14.1)
 - qualifies for charitable donations, 149.1(1)“qualified donee”(b.1)
- Registered labour-sponsored venture capital corporation**, *see* Labour-sponsored venture capital corporation (LSVCC): registered
- Registered life insurance policy**
- defined, 211(1)
- Registered mail**
- no longer needed, for notice of objection, 165(2)
- Registered national arts service organization**
- benefits from, included in income, 56(1)(z.1)
 - deemed to be registered charity, 149.1(6.4)
 - defined, 248(1)
 - exempt from tax, 149(1)(l)
 - prescribed conditions, Reg. 8700
 - receipts issued by, Reg. 3500“registered organization”
 - registration, 149.1(6.4)
 - revocation of designation, 149.1(6.5)
- Registered non-resident insurer**
- defined, Reg. 804
 - withholding requirements, Reg. 800–805.1
- Registered organization**
- defined, for donations and gifts, Reg. 3500

Index

- Registered pension plan**, 147.1–147.3, Reg. Part LXXXIII–LXXXV
- actuarial report, 147.2(3), Reg. 8410
 - actuary, defined, 147.1(1)
 - administrator, 147.1(6)–(7)
 - defined, 147.1(1)
 - obligations, 147.1(7)
 - requirement, 147.1(6)
 - separate liability, 147.1(16)
 - amendments to, 147.1(4), (15), 172(3), (5), Reg. 8511, 8512(3)
 - annuity, rollover from RPP, 147.4
 - appeal
 - refusal to accept amendment, from, 172(3)(f.1), 172(5)
 - refusal to register, from, 172(3)
 - application for registration, 147.1(2), Reg. 8512(1)
 - “as registered” meaning, 147.1(15)
 - average wage, defined, 147.1(1)
 - balance of annuitized voluntary contributions, 60.2(2)
 - benefit provisions, transfer between, 147.3(14.1)
 - benefits from
 - association of, with employers, Reg. 8305
 - during phased retirement, Reg. 8503(16)–(25)
 - flowed through trust, 104(27)
 - unauthorized, 147.3(10), (12)
 - maximum, Reg. 8504
 - rollover for financially dependent child, 60(1)(v)(B.01)
 - taxable, 56(1)(a)(i)
 - borrowing restrictions, Reg. 8502(i), (i.1)
 - bridging benefits, pension income credit, 118(8.1)
 - buy-out annuity, 147.4(1)
 - COVID-19 relief for 2020–22, *see* COVID-19
 - certification of past service benefit, *see* Past service event
 - communication of information re, 241(4)(d)(vii)
 - commutation of benefits, Reg. 8503(2)(m), (n), 8503(2.1)
 - compensation, defined, 147.1(1)
 - conditions, 147.1(2), (5), Reg. 8501–8506
 - continuation of, in amalgamation, 87(2)
 - contract under, 254
 - contribution error correction, *see* Pension adjustment correction; Permitted corrective contribution (to pension plan)
 - contribution made in error, repayment of, 56(1)(a)(i)(G), 147.1(19)
 - contribution, prescribed, 147.2(2), Reg. 8516
 - death of contributor, amount deductible, 147.2(6)
 - defined, 248(1); ITAR 17(8)
 - defined benefit provision, defined, 147.1(1)
 - definitions, 147.1(1)
 - designated plan, Reg. 8515
 - special rule, Reg. 8515
 - eligible contribution, defined, 147.2(2), Reg. 8515(5), 8516
 - emigration of member, no deemed disposition, 128.1(10)“excluded right or interest”(a)(viii)
 - employee’s contribution deductible, 147.2(4), Reg. 8502(b)(i), 8503(4)(a), (b)
 - employer’s contribution
 - deductible, 20(1)(q), (s), 147.2(1), Reg. Part XXVII
 - defined benefit provision, 147.2(2)
 - filing of actuarial report, 147.2(3)
 - limits, 147.1(8), (9), Reg. 8506(2)
 - not taxable benefit, 6(1)(a)(i)
 - exempt from tax, 149(1)(o), (o.1)
 - excluded from various trust rules, 108(1)“trust”(a)
 - filing annual return, Reg. 8409
 - fixing contribution errors, *see* Pension adjustment correction; Permitted corrective contribution (to pension plan)
 - foreign plan, *see* Foreign plan (pension plan)
 - foreign service, *see* Foreign service
 - grandfathered plan
 - complying before March 1996 budget date, Reg. 8509(13)
 - defined, Reg. 8500(1)
 - includes references to “approved” plan, ITAR 17(8)
 - income accruing in
 - not taxed by U.S., Canada–U.S. tax treaty Canada-U.S. Tax Treaty:Art. XVIII:7
 - information return, Reg. 8409
 - insolvent employer, commutation of benefits
 - rollover to RRSP, 146(5.2), (5.201)
 - transfer to another RPP, Reg. 8517(3)–(3.02)
 - insurance corporation demutualization conversion benefit, 139.1(12), (14)
 - limits on contributions, 147.1(8), (9), 147.2(4), Reg. 8506(2)
 - member of plan, defined, 147.1(1)
 - Minister to obtain advice of Superintendent of Financial Institutions, 147.1(17)
 - money borrowed for contribution to
 - limitation on interest deductibility, 18(11)(c)
 - money purchase limit, defined, 147.1(1)
 - money purchase provision
 - benefits permissible, Reg. 8506(1)
 - contributions eligible, Reg. 8506(2)
 - defined, 147.1(1)
 - minimum amount, Reg. 8506(5), (7), (7.1)
 - transfer from RRIF, 146.3(14.1)(b)
 - multi-employer plan
 - anti-avoidance, 147.1(14)
 - becoming revocable plan, 147.1(9)
 - defined, 147.1(1), Reg. 8500(1)
 - pension adjustment limits, 147.1(9)
 - registration requirements, Reg. 8510(7)
 - specified
 - defined, 147.1(1), Reg. 8510(2)
 - rules, Reg. 8510(3), (5)–(7)
 - no tax payable by, 149(1)(o), (o.1)
 - non-member benefits, Reg. 8500(8)
 - non-residents
 - payment under, withholding tax, 212(1)(h)
 - participating employer, defined, 147.1(1)
 - past service benefits, determination of, 147.1(10)
 - past service contributions
 - additional voluntary contributions, deductible for 1986, 8(1.1)
 - by employer
 - deductible, 147.2(2), Reg. 8516(2)
 - past service event
 - defined, 147.1(1), Reg. 8300(1), (2)
 - restrictions on pension funding and benefits, 147.1(10), Reg. 8306, 8307(2)
 - past service payments into, 57(4)
 - payment under, taxable, 56(1)(a)(i), 212(1)(h), 254
 - pension adjustment, *see* Pension adjustment
 - pension adjustment limits, *see also* Pension adjustment
 - phased retirement, Reg. 8503(16)–(25)
 - plan as registered, 147.1(15)
 - pooled, *see* Pooled registered pension plan
 - prohibited investments, Reg. 8502(h), 8514(1)
 - refund of undeducted past service additional voluntary contributions, 60.2(1)
 - registration of, 147.1(2), (3)
 - additional conditions, 147.1(5)
 - amendments, conditions for acceptance of, 147.1(4)
 - deemed from time of application, 147.1(3)
 - regulations, 147.1(18), Reg. Part LXXXIII–LXXXV
 - revocation of, 147.1(13), 147.3(12)
 - notice, 147.1(12)
 - notice of intention, 147.1(11)
 - reorganization of money purchase plan, 147.3(7.1)
 - repayment of post-1989 benefits, 60(j.04)
 - reporting requirements, Reg. 8400–8410

Index

- Registered pension plan (*cont'd*)
- retiring allowances transferred to, 60(j.1)
 - reversionary trust rules do not apply, 75(3)(a)
 - rollover, *see* transfer from; transfer to
 - salary deferral leave plan, Reg. 8508
 - shared-funding arrangement, Reg. 8501(6.1)
 - single amount, defined, 147.1(1)
 - specified multi-employer plan
 - defined, 147.1(1), Reg. 8510(2)
 - rules, Reg. 8510(3), (5)–(7)
 - spouse, defined, 147.1(1)
 - successor plan, Reg. 8308(8)
 - termination of, Reg. 8409(3)
 - transfer of members to new plan, Reg. 8500(9)
 - transfer of property between benefit provisions, 147.3(14.1)
 - transfer to, Reg. 8502(b)(iv)
 - another RPP, from, 147.3
 - DPSP, from, 147(19)(d)(i)
 - PRPP, from, 147.5(21)(c)(iii)
 - RRIF, from, 146.3(14.1)(b)
 - RRSP, from, 146(16)(a)
 - transfer from
 - ALDA (advanced life deferred annuity), to, 147.3(1)(c)(iv)
 - actuarial surplus, of, 147.3(4.1), (7.1)
 - annuity, to, 147.4
 - another RPP, to, 147.3(1)–(8), Reg. 8517
 - death, on, 147.3(7)
 - deemed, 147.3(14)
 - division of amount transferred, 147.3(11)
 - excess, 147.3(13)
 - lump sum on death, 147.3(7)
 - marriage breakdown, on, 147.3(5)
 - money purchase plan to money purchase plan, 147.3(7.1)
 - pre-1991 contributions, 147.3(6)
 - RRIF, to, 146.3(2)(f)(v), (vi), 147.3(1), (4)–(7), (10)
 - RRSP, to, 147.3(1), (4)–(7), (10)
 - registered disability savings plan, to, on death, 60.02
 - restrictions re, 147.3(12)
 - taxation of amount transferred, 147.3(9)
 - transfers to
 - actuarial surplus, of, 147.3(4.1), (7.1)
 - another RPP, from, 147.3, Reg. 8517
 - deferred profit sharing plan, from, 147(19)
 - via a trust, 104(27.1)
 - marriage breakdown, on, 147.3(5)
 - money purchase plan from money purchase plan, 147.3(7.1)
 - pension benefits received through trust, of, 60(j)(ii)
 - RRSP, from, 146(16)
 - retiring allowance, 60(j.1)
 - unregistered plan, from, 60(j)(i)
 - United States tax treatment of, *see* Qualifying retirement plan
 - variable benefits, Reg. 8506(1)(e.1)
 - wage measure, defined, 147.1(1)
- Registered plan**
- defined, 207.01(1)
- Registered plan strip**
- constitutes advantage, 207.01(1)“advantage”(d)
 - defined, 207.01(1)
 - 100% tax on, 207.05(2)(c)
- Registered retirement income fund**
- acceptance for registration, 146.3(2)
 - administration fees, non-deductible, 18(1)(u)
 - advantage, 207.01(1)“advantage”, 207.05
 - amended
 - deemed receipt, 204.2(1.4)
 - amounts received, income, 56(1)(t)
 - annuitant
 - defined, 146.3(1)
 - emigration from Canada, no deemed disposition, 128.1(10)“excluded right or interest”(a)(ii)
 - annuities, holding of, 146.3(1)“qualified investment”(b.1), (b.2)
 - benefits taxable, 146.3(5)
 - business carried on by, 146.3(3)(c)
 - carrier, defined, 146.3(1)“annuitant”
 - change in fund after registration, 146.3(11)–(13)
 - common-law spouse, breakdown of relationship, 146.3(14)(a)
 - death of last annuitant, 146.3(6)–(6.2)
 - carryback of losses, 146.3(6.3), (6.4)
 - defined, 146.3(1), 248(1)
 - depositary, 146.3(1)“carrier”(d)
 - conditions for registration, 146.3(2)(c)
 - exempt from tax on amounts added or earned, 146.3(15)
 - designated benefit
 - amount deductible, 146.3(6.2)
 - deemed received, 146.3(6.1)
 - defined, 146.3(1)“designated benefit”
 - transfer of, to spouse, child or grandchild, 146.3(6.11)
 - designation of charity as beneficiary, 118.1(5.2)(b)
 - disposition of property to, capital loss nil, 40(2)(g)(iv)(A)
 - eligible amount, 146.3(6.11)
 - emigration of annuitant, no deemed disposition, 128.1(10)“excluded right or interest”(a)(ii)
 - excessive small business property holding, tax, 207.1(5) (repealed retroactively)
 - excluded from various trust rules, 108(1)“trust”(a)
 - exempt from tax, 146.3(3), 149(1)(x)
 - fair market value of plan to be reported to CRA, Reg. 215(2.1)
 - income accruing in
 - not taxed, 146.3(3), (15), 149(1)(x)
 - not taxed by U.S., Canada–U.S. tax treaty Canada–U.S. Tax Treaty:Art. XVIII:7
 - income not subject to annual accrual, Reg. 7000(6)
 - information returns, Reg. 215
 - insurance corporation demutualization conversion benefit, 139.1(12), (14)
 - interest income deemed not received by annuitant, 146.3(15)
 - investment counselling fees, non-deductible, 18(1)(u)
 - life income fund, treated as RRIF (no legislative provisions, *see* Notes to 147.3(1))
 - locked-in annuities, 146.3(1)“qualified investment”(b.2)
 - losses after death, 146.3(6.3), (6.4)
 - minimum amount
 - defined, 146.3(1), Reg. 7308(3), (4)
 - for 2008, 146.3(1.1), (1.2)
 - for 2020, 146.3(1.4), (1.5)
 - recontribution due to reduced 2008 minimum, 60.021
 - recontribution due to reduced 2015 minimum, 60.022
 - requirement to pay out annually, 146.3(1)“retirement income fund”
 - non-qualified investment
 - defined, 146(1), 207.01(1)
 - tax on, 207.04
 - non-resident, payment to, 212(1)(q)
 - payments under
 - attributed to spouse, 146.3(5.1)
 - joint and several liability for tax on, 160.2(2)–(4)
 - non-resident, to, 212(1)(q)
 - election to file return, 217
 - taxable, 146.3(5)
 - withholding of tax, 153(1)(l), Reg. 103(4), 103(6)(d.1)
 - plan fees paid by owner, not an advantage conferred on plan, 207.01(1)“advantage”(b)(i)
 - prohibited investment, tax on, 207.04
 - property
 - disposition or acquisition, 146.3(4)
 - transfer of, 146.3(14)–(14.2)
 - used as security, recovery of, 146.3(10)

Index

- Registered retirement income fund (*cont'd*)
- “property held” in connection with the fund, 146.3(1)
 - qualified investment, defined, 146.3(1)
 - Quebec, in deemed to be trust, 248(3)(c)
 - recontribution of amounts withdrawn for 2015 when minimum amount reduced, 60.022
 - registration of, 146.3(2)
 - retirement income, defined, 146(1)
 - retirement income fund, defined, 146.3(1)
 - reversionary trust rules do not apply, 75(3)(a)
 - revocation of registration, 146.3(11)–(13)
 - rollover, *see see* transfer from; transfer to
 - services in respect of, non-deductible, 18(1)(u)
 - tax-paid amounts, *see* Tax-paid amount
 - tax payable by
 - on acquisition of shares not at fair market value, 207.1(5)
 - on non-qualified or prohibited investment, 207.04
 - transfer from
 - another RRIF, to, 146.3(2)(e)–(e.2), 146.3(14)(b)(i)
 - marriage breakdown, on, 146.3(14)(a)
 - money purchase RPP, to, 146.3(14.1)(b)
 - PRPP, to, 146.3(14.1)(a)
 - RRSP, to, 146.3(14)(b)(ii)
 - registered disability savings plan, to, on death, 60.02
 - spouse’s RRSP, to, on marriage breakdown, 146.3(14)(a)
 - transfer to
 - ALDA (advanced life deferred annuity), from, 146.3(2)(f)(ix)
 - amount to be included in income, 146.3(5.1)
 - another RRIF, from, 146.3(14)(b)(i)
 - balance of annuitized voluntary contributions, pre-10/9/86, 60.2(2)
 - deceased spouse’s RRSP, from, 60(1)
 - PRPP, from, 147.5(21)(c)(iv)
 - RPP, from, 146.3(2)(f)(v), (vi), 147.3(1), (4)–(7), (10)
 - RRSP, from 146(16), 146.3(5.1)
 - rules, 146.3(5.1)–(5.5)
 - trust, not taxed, 146.3(3), 149(1)(x)
 - value of plan to be reported to CRA, Reg. 215(2.1)
 - withholding of tax, 153(1)(l), Reg. 103(4), 103(6)(d.1)
- Registered retirement savings plan**
- administration fees, non-deductible, 18(1)(u)
 - advantage, 207.01(1)“advantage”, 207.05
 - age 71 maturity, 146(2)(b.4)
 - amended plan, 146(12)
 - deemed receipt, 204.2(1.4)
 - payments out of, subject to withholding of tax, 153(1)(j)
 - amount deductible
 - excess premiums, 146(8.2)
 - deemed not premiums, 146(8.21)
 - amount included in computing income, 146(8.3)–(8.7)
 - amounts received from, income, 56(1)(h), 146(8)
 - annuitant
 - defined, 146(1)
 - emigration from Canada, no deemed disposition, 128.1(10)“excluded right or interest”(a)(i)
 - annuities, holding of, 146(1)“qualified investment”(c.1), (c.2)
 - annuity acquired or provided under, pre-Oct9/86
 - balance of annuitized voluntary contributions to RPP, 60.2(2)
 - attribution rule re payments from spousal plan, 146(8.3)
 - benefits from, 146(8)–(8.91)
 - rollover for financially dependent child, 60(1)(v)(B.01)
 - spousal plan, attribution to spouse, 146(8.3)
 - taxable, 146(8)
 - where plan not registered at end of year entered into, 146(15)
 - borrowing against,
 - income inclusion, 146(10)(b)
 - prohibited for depositary plan, 146(2)(c.3)(ii)
 - borrowing from
 - to finance education, *see* Lifelong Learning Plan
 - to purchase a home, *see* Home Buyers’ Plan
 - business carried on by, 146(4)(b)
 - change in, after registration, 146(12), (13)
 - common-law spouse, breakdown of relationship, 146(16)
 - contributions, *see* premiums (*below*)
 - cumulative excess amount re, 204.1(2.1), 204.2(1.1)
 - death, effect of, 146(8.8)–(8.91)
 - carryback of losses, 146(8.92), (8.93)
 - refund of premiums to child or grandchild, rollover to new RRSP, 60(1)(v)(B.1)
 - refund of premiums to spouse, child or grandchild, 146(1)“refund of premiums”
 - deduction limit, 146(1)“RRSP deduction limit”
 - defined, 248(1)
 - defined, 146(1), 248(1)
 - definitions, 146(1)
 - designation of charity as beneficiary, 118.1(5.2)(b)
 - disposition of property to, capital loss nil, 40(2)(g)(iv)(B)
 - dollar limit, 146(1)“RRSP dollar limit”
 - defined, 248(1)
 - emigration of annuitant, no deemed disposition, 128.1(10)“excluded right or interest”(a)(i)
 - excess amount for a year re, 204.2(1)
 - excess contributions
 - tax on, 204.1
 - withdrawal of, 146(8.2)
 - excessive small business property holding, tax, 207.1(5) (repealed retroactively)
 - excluded from various trust rules, 108(1)“trust”(a)
 - exempt from tax, 146(4), 149(1)(r)
 - fair market value of plan to be reported to CRA, Reg. 214(1.1)
 - Home Buyers’ Plan, *see* Home Buyers’ Plan
 - home mortgage as investment, Reg. 4900(1)(j)–(j.2)
 - income accruing in
 - not taxed, 146(4), 149(1)(r)
 - not taxed by U.S., Canada-U.S. Tax Treaty:Art. XVIII:7, XXIX:5
 - income not subject to annual accrual, Reg. 7000(6)
 - information returns, Reg. 214, 214.1
 - insurance corporation demutualization conversion benefit, 139.1(12), (14)
 - interest on money borrowed to invest in, not deductible, 18(11)(b)
 - investment counselling fees, non-deductible, 18(1)(u)
 - investment in small businesses, Reg. 4900(6), (12)
 - issuer extending advantage, 207.01(1)“advantage”
 - “issuer” of, defined, 146(1)
 - labour-sponsored venture capital corporation, 127.4(1)“qualifying trust”, 127.4(6)(a)
 - labour-sponsored venture capital corporation shares, acquisition of, 127.4(1)“qualifying trust”, (3)
 - life insurance policies, 146(11)
 - Lifelong Learning Plan, *see* Lifelong Learning Plan
 - losses after death, 146(8.92), (8.93)
 - maturity by age 71, 146(2)(b.4)
 - money borrowed to pay premium
 - limitation on interest deductibility, 18(11)(b)
 - mortgage as investment, Reg. 4900(1)(j)–(j.2)
 - net past service pension adjustment, meaning, 146(1)
 - non-qualified investment
 - defined, 146(1), 207.01(1)
 - tax on, 207.04
 - non-resident withholding tax, 212(1)(l)
 - overcontribution to
 - no deduction for, 146(5)
 - non-deductible, withdrawal of, 146(8.2)
 - tax on, 204.1(2.1)

Index

- Registered retirement savings plan (*cont'd*)
 - transfer from RPP, deduction if withdrawn, 147.3(13.1)
 - payments under
 - joint and several liability for tax on, 160.2(1), (3), (4)
 - non-residents, to, 212(1)(l)
 - election to file return, 217
 - remuneration, Reg. 100(1)
 - taxable, 56(1)(h), 146(8), 212(1)(l)
 - withholding tax, 153(1)(j)
 - plan fees paid by owner, not an advantage conferred on plan, 207.01(1)“advantage”(b)(i)
 - pledging assets of, *see* borrowing against (above)
 - premiums
 - amount deductible, 60(i), 146(5), (5.2), (6.1)
 - excess, refunded, deemed not premiums, 146(8.21)
 - minimum tax, 127.52(1)(a) [repealed]
 - paid before registration, 146(14)
 - refund of, on overcontribution, 146(8.2)
 - undeducted, 204.2(1.2)
 - prohibited investment, tax on, 207.04
 - property used as security for loan, recovery of, 146(7)
 - qualified investments of, 146(1), Reg. 4900
 - Quebec, in deemed to be trust, 248(3)(c)
 - recontribution of certain withdrawals, deduction for, 146(6.1)
 - refund of excess contributions, 146(8.2)
 - refund of premiums, 146(1)
 - deemed receipt of, 146(8.1)
 - defined, 146(1)
 - estate, to, 146(8.1)
 - transferred to annuity, RRSP or RRIF, 60(l)
 - registration of, 146(2), (3), (13.1)
 - change after, 146(12), (13)
 - retiring allowance, transfer to, 60(j.1)
 - reversionary trust rules do not apply, 75(3)(a)
 - rollover, *see* transfer from; transfer to
 - rules governing, 146
 - security, not to be used as, 146(2)(c.3)(ii)
 - services in respect of, non-deductible, 18(1)(u)
 - spousal plan, 146(8.3)
 - attribution on withdrawals, 146(8.3)
 - defined, 146(1)
 - premiums
 - amount deductible, 146(5.1)
 - not subject to income attribution rules, 74.5(12)
 - spouse
 - breakdown of relationship, on, 146(16)
 - transfer to, on death, 146(1)“refund of premiums”, 146(8.91)
 - tax on over-contributions to, 204.1
 - tax-paid amounts, *see* Tax-paid amount
 - tax payable by
 - on acquisition of shares not at fair market value, 207.1(5)
 - on non-qualified or prohibited investment, 207.04
 - termination at age 71, 146(2)(b.4)
 - transfer from
 - to ALDA (advanced life deferred annuity), 146(16)(a.1)
 - to another RRSP or RRIF, 60(l), 146(16)
 - amount to be included in income, 146.3(5.1)
 - rules, 146.3(5.1)–(5.5)
 - tracking of funds, 146(8.4)
 - to RDSP, on death, 60.02
 - to RPP, 146(16)(a)
 - transfer to
 - another RPP, from, 147.3
 - another RRSP, from, 146(16)
 - capital loss deemed nil, 40(2)(g)(iv)(A)
 - capital loss denied, 40(2)(g)(iv)(B)
 - DPSP, from, 147(19)(d)(i)
 - deceased person’s RRSP, from, 60(l)
 - PRPP, from, 147.5(21)(c)(iv)
 - pension benefits received through a trust, 60(j)(ii)
 - RPP, from, 147.3(1), (4)–(7), (10)
 - division of amount transferred, 147.3(11)
 - taxation of amount transferred, 147.3(10)
 - RRIF, from, 146.3(14)(b)(ii)
 - RRSP, from, 146(16)(a)
 - retiring allowance, 60(j.1)
 - spouse, for, on marriage breakdown, 147.3(5)
 - unregistered plan, from, 60(j)(i)
 - trust
 - disposition of property by, 146(9)
 - non-qualified investments acquired by, 146(10)
 - non-qualified investments held by
 - tax payable, 146(10.1)
 - not taxed, 146(4), 149(1)(r)
 - United States residents, deferral, Canada-U.S. Tax Treaty:Art. XVIII:7
 - United States retirement plan, deduction limit applies, 146(1)“unused RRSP deduction room”(b)D(ii), Canada-U.S. Tax Treaty:Art. XVIII:11
 - unused deduction room, meaning, 146(1)
 - value of plan to be reported to CRA, Reg. 214(1.1)
 - withdrawal of funds for education, *see* Lifelong Learning Plan
 - withdrawal of funds to purchase home, *see* Home Buyers’ Plan
 - withholding on withdrawals of funds, Reg. 103(4)
- Registered securities dealer**, *see also* Broker; Investment dealer; Securities
 - defined, 248(1)
 - securities lending arrangement payments to non-residents
 - information return required, 212(18)
 - tax on excessive payments, 212(19)
- Registered segregated fund trust**
 - excluded from various trust rules, 108(1)“trust”(a)
- Registered supplementary unemployment benefit plan**
 - amendment of, amounts received, 145(4)
 - benefits received, income, 56(1)(g)
 - defined, 145(1)
 - emigration of employee, no deemed disposition, 128.1(10)“excluded right or interest”(a)(xi)
 - employer’s contribution under, 20(1)(x), 145(5)
 - excluded from various trust rules, 108(1)“trust”(a)
 - reversionary trust rules do not apply, 75(3)(a)
 - rollover to new trust, 248(1)“disposition”(f)(vi)
 - trust not taxable, 145(2), 149(1)(q)
 - winding-up of, amounts received, 145(4)
- Registration**
 - business, *see* Business Number
 - Canadian amateur athletic association, 248(1)“registered Canadian amateur athletic association”
 - appeal from refusal or revocation by Minister, 172(3), (4)
 - certificate in Federal Court, of tax owing to Crown, 223(3)
 - charity, *see* Registered charity: registration of
 - deferred profit sharing plan, 147(2)–(5), Reg. 1501
 - education savings plan, 146.1(2), (4), (12)
 - employees profit sharing plan, as DPSP, 147(3), (4)
 - GST, *see* Business Number
 - labour sponsored venture capital corporation, 204.81(1)
 - multi-employer pension plan, Reg. 8510(7)
 - national arts service organization, 149.1(6.4)
 - appeal from refusal or revocation by Minister, 172(3), (4)
 - pension plan, 147.1(2), (3), Reg. 8512(1)
 - multi-employer plan, Reg. 8510(7)
 - profit sharing plan, as DPSP, 147(2)
 - registered education savings plan, *see* education savings plan (above)
 - registered investment, deemed, 204.4(7)
 - registered pension plan, *see* pension plan (above)

Index

Registration (*cont'd*)

- registered retirement income fund, *see* retirement income fund (below)
- registered retirement savings plan, *see* retirement savings plan (below)
- retirement income fund, 146.3(2)
- retirement savings plan, 146(2), (3), (13.1)
- revocation of, *see* Revocation of registration
- tax shelter, 237.1, *see also* Tax shelter

Registration information

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

Regular adjustment period

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

Regular customers

- defined, for FAPI rules, 95(2.4)(b)

Regular eligible amount

- defined, for Home Buyers' Plan, 146.01(1)

Regulated foreign financial institution, *see* Offshore regulated bank

Regulated innovative capital

- defined, 122.1(1)
- excluded in determining whether trust is SIFT trust, 122.1(1)"investment"(b)(ii)

Regulated Investment Company (U.S.)

- dividend paid to Canadian resident, Canada-U.S. Tax Treaty:Art. X:7(b)

Regulations

- definitions in, *Interpretation Act* s. 16
- failure to comply with, penalty, 162(7)
- incorporating material amended from time to time, 221(4)
- Income Tax, reproduced after the *Income Tax Act* and *Income Tax Application Rules*
- judicial notice to be taken of, 244(12)
- meaning, 248(1)
- provision for, 147.1(18), 214(13), 215(5), 221(1)
- publication of, in *Canada Gazette*, 221(2)
- reducing amount of non-resident withholding tax, 215(5)
- residents in Canada, re, 214(13)
- retroactive effect, limitation on, 221(2)
- whether binding on Her Majesty, 221(3)

Regulatory innovative capital, *see* Regulated innovative capital

Rehabilitative therapy

- for hearing/speech loss, medical expense, 118.2(2)(1.3)

Reimbursement

- alimony or maintenance payments, 56(1)(c.2), 60(c.2)
- disability insurance top-up paid by employer, 8(1)(n.1)
- election to offset against outlay or expense, 12(2.2)
- housing loss, by employer, 6(19)–(22)
- included in income, 12(1)(x)
- prescribed amount, Reg. 7300
- inducements, 20(1)(hh)
- legal expenses of collecting salary etc., re
 - included in employee's income, 6(1)(j)
- loss in value of home, for, 6(19)–(22)
- medical expenses, 118.2(3)(b)
- motor vehicle expenses, in respect of, 6(1)(b)(xi)
- payments as
 - election re adjusted cost base, 53(2)(s), 53(2.1)
- petroleum/natural gas etc. royalties included in income, for, 80.2
- received by beneficiary of trust, or partner, 12(2.1)
- salary or wages, of, 8(1)(n)
- support payments, 56(1)(c.2), 60(c.2)

Reimbursement payment

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

Reinsurance arrangement

- defined, 211(1)

Reinsurance commission

- defined [repealed], Reg. 1408(1)
- exclusion from matchable expenditure rules, 18.1(15)
- whether deductible, 18(9.02)

Reinsurance contract held amount

- defined
 - for determining insurer's capital, 138(12), 181(2), Reg. 8600
 - for insurers' IFRS transition rules, 138(12), Reg. 2400(1)
 - for insurers' policy reserves, Reg. 1408(1)

Reinsurance recoverable

- defined [repealed], Reg. 2400(1)

Reinsurance recoverable amount

- defined, Reg. 1408(1)

Reinsurance trust

- exemption from withholding tax, 212(9)(d)

Reinsurer

- sales commissions, excluded from matchable expenditure rules, 18.1(15)

Related, *see* Related persons

Related business

- defined, for income-splitting tax, 120.4(1)
- income derived from, income-splitting tax, 120.4(1)"split income"(b)(ii), (c)(ii)(C)
- of charity
 - defined, 149.1(1)
 - revocation of registration for carrying on other business, 149.1(2)(a)

Related entity

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

Related group

- allocation of surtaxes on banks and life insurers, 123.6(3), 191.5(5)
 - defined, 251(4)
 - for surtaxes on banks and life insurers, 123.6(3), 191.5(5)
- ### Related persons, *see also* Associated corporations
- deemed not to deal at arm's length, 251(1)(a)
 - defined, 251(2)
 - extensions to definition
 - for butterfly transactions, 55(5)(e)
 - for debt forgiveness rules, 80(2)(j)
 - for financial institutions tax, 190.15(6)
 - for foreign affiliates, 95(2.2)(b), 95(6)(a)(i)
 - for loans to non-residents, 17(11), (11.1), (11.3)
 - for transfer pricing, Canada-U.S. Tax Treaty:Art. IX:2

Related segregated fund trust, 138.1

- adjusted cost base of, 53(1)(l), 53(2)(q)
- application on qualifying disposition to trust, 107.4(3)(g)
- defined, 138.1(1)(a)
- minimum tax not payable by, 127.55(f)(i)
- rollover to new trust, 248(1)"disposition"(f)(vi)

Related transactions

- defined, for foreign tax credit, 126(7)

Relationship, defined, 251(6)

- for certain Part I.3 purposes, 181.5(6)

Relationship deposits

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

Release or surrender, defined, 248(9)

Relevant activity

- defined, for digital platform operator reporting rules, 282(1)

Relevant affiliate interest and financing expenses

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

Relevant affiliate interest and financing revenues

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

Relevant assumption

- defined, FAPI partnership rules, 93.1(6)(b)

Relevant authority, *see also* Competent authority

- defined
- for IFRS transition for insurers, 138(12)
- for insurers' policy reserves regulations, Reg. 1408(1)
- for policy reserves in insurance business, Reg. 1408(1)
- for prescribed amount and recovery rate, Reg. 8006

Relevant contribution (re eligible funeral arrangement)

- defined, 148.1(1)

Relevant conversion benefit

- defined, for insurance demutualization, 139.1(16)(a)

Relevant criminal offence, *see also* Relevant offence

- causing person to be ineligible to manage charity, 149.1(1) "ineligible individual"(a)
- defined, 149.1(1)

Relevant entity

- defined, for residence of international shipping corporation, 250(6.02)

Relevant factor

- defined, 248(1)

Relevant financial statements

- defined, for uncertain-tax-treatment rules, 237.5(1)

Relevant foreign income or profits

- defined, for hybrid mismatch arrangement rules, 18.4(1), 113(3)

Relevant foreign tax law

- defined, for artificial foreign tax credit generator rules, 91(4.1)(a)(i), (ii), 126(4.11), Reg. 5907(1.03)(a), (b)

Relevant funder

- defined, for non-resident withholding tax back-to-back rules, 212(3.8)

Relevant funding arrangement

- defined, for non-resident withholding tax back-to-back rules, 212(3.8)

Relevant licensor

- defined, for non-resident withholding tax back-to-back rules, 212(3.94)

Relevant limit (re debt forgiveness rules, partnerships)

- defined, 80(15)(b)
- limitation on deduction to partner, 80(15)(a)

Relevant loss balance (for debt forgiveness rules)

- application of, 80(3), (4)
- defined, 80(1)

Relevant non-arm's length entity

- defined, for FAPI rules, 95(1)

Relevant offence, *see also* Relevant criminal offence

- causing person to be ineligible to manage charity, 149.1(1) "ineligible individual"(b)
- defined, 149.1(1)

Relevant period

- defined
- for alternative interest-deduction restrictions, 18.21(1)
- for non-resident withholding tax on back-to-back loans, 212(3.1)(c)

Relevant person

- defined
- for acquisition of control of corporation from SIFT, 256(7)(c.1)(i)
- for FAPI rules re services, 95(3.02)
- for FAPL (loss) rules, Reg. 5903(7), *see also* Relevant person or partnership
- for private foundations, 149.1(1)

Relevant person or partnership

- defined, for foreign accrual property loss, Reg. 5903(6)

Relevant proportion

- for carbon tax refund to farmers, 127.42(1)

Relevant province

- defined, for Climate Action Incentive, 122.8(4)A

Relevant provision

- defined
- FAPI partnership rules, 93.1(6)(a)
- trust transfer of farm/fishing property to settlor's children, 70(9.11)(c)

Relevant royalty arrangement

- defined, for non-resident withholding tax back-to-back rules, 212(3.94)

Relevant service

- defined, for digital platform operator reporting rules, 282(1)

Relevant spot rate

- defined, for functional currency rules, 261(1)

Relevant tax factor (for FAPI)

- defined, 95(1)

Religious order, members' charitable gifts, 110(2)**Religious organization**, *see* Communal organization; Registered charity**Relocation**, *see also* Moving expenses

- counselling, *see* Counselling services
- eligible, *see* Eligible relocation
- reimbursement for loss of value of home, *see* Housing loss

Remainder interest, disposition of, *see* Life estate in real property**Remission orders**

- text of, reproduced after the *Income Tax Regulations*

Remittance of taxes withheld, *see also* Withholding

- deemed remitted on day received by Receiver General, 248(7)
- interference with, by secured creditor, 227(5.2)–(5.4) (1995 draft, abandoned)
- large employers must remit through financial institution, 153(1), Reg. 110
- exception, 153(1.4)
- new small employers, quarterly remittance, Reg. 108(1.13)
- over \$10,000, must be electronic, 160.5(2), 162(7.4)
- small employers, quarterly remittance, Reg. 108(1.12)
- source withholdings, Reg. 108
- unclaimed dividends and interest, 153(4), Reg. 108(4)

Remote work site, employment at, 6(6), *see also* Northern Canada**Remuneration**, *see also* Salary

- defined
- for Canadian film/video tax credit, Reg. 1106(1) "remuneration"
- for source withholdings, Reg. 100(1)
- information returns, Reg. Part II
- ranges of, Reg. Sch. I
- total
- defined, Reg. 100(1)
- unpaid, 78(4)
- withholding of tax on, 153(1)(a)
- failure to remit amounts withheld, 227(9.5)
- failure to withhold, 227(8.5)

Renewable energy, *see* Energy: renewable**Renovation period**

- defined, for Multigenerational Home Renovation Tax Credit, 122.92(1)

Renovation period taxation year

- defined, for Multigenerational Home Renovation Tax Credit, 122.92(1)

Renovations

- disability-related
- deductible, 20(1)(qq)
- medical expense credit, 118.2(2)(1.2)

Rent

- accrual of, to date of death, 70(1)(a)

Index

- Rent (*cont'd*)
 - deduction for, 9(1)
 - future period, for
 - not “outlay” or “expense”, 66(15)“outlay” or “expense”
 - income
 - taxable, 9(1)
 - whether specified investment business, 125(7)“specified investment business”
 - meaning of, 18(1)(d) (Notes)
 - non-resident withholding tax, *see* paid to non-resident (below)
 - office, paid by employee, 8(1)(i)(ii)
 - certificate of employer, 8(10)
 - paid on depreciable property before acquisition, deemed CCA, 13(5.2)
 - paid to non-resident, 212(1)(d), 212(13)
 - alternative tax, 216
 - re railway rolling stock, exemption, 212(1)(d)(vii)
 - prepaid, non-deductible, 18(9)
 - scientific research expenditures, limitations, 37(8)(d)(ii)
 - subsidy, *see* Canada Emergency Rent Subsidy
 - treaty rules, Canada-U.S. Tax Treaty:Art. VI
- Rent from real or immovable property**
 - defined, for SIFT trust and partnership distributions, 122.1(1)
- Rent subsidy percentage**
 - defined, for COVID-19 Canada Emergency Rent Subsidy, 125.7(1)
- Rent top-up percentage**
 - defined, for COVID-19 Canada Emergency Rent Subsidy, 125.7(1)
- Rental cost**
 - defined, Reg. 5202
- Rental Housing Benefit Act**
 - details of, 122.5(3.002) Notes
 - disclosure of information for purposes of, 241(4)(d)(xxi), (xxii)
- Rental or leasing property**
 - defined, 127.52(3)
 - minimum tax, 127.52(1)(b), (c)(ii)
- Rental properties**
 - capital cost allowance, Reg. 1100(11)–(14.2), 1101(1ac)–(1ae)
 - non-arm’s length exception, Reg. 1102(20)
 - defined, Reg. 1100(14)–(14.2)
 - minimum tax, 127.52(1)(b), (c.2)(ii), 127.52(3)“rental or leasing property”
- Renunciation**, *see* Flow-through shares
- Reorganization**, *see also* Amalgamation; Rollover; Winding-up
 - butterfly, 55(3)(b)
 - corporate, generally, 84–88
 - divisive (butterfly), 55(3)(b)
 - effect on stock options, 7(1.4), (1.5)
 - mutual fund corporation or trust, 132.2
 - of business, payment to shareholder deemed dividend, 84(2), (6)
 - of capital, exchange of shares, 86(1); ITAR 26(27)
 - property acquired in course of
 - capital cost allowance, Reg. 1100(2.2)
 - registered pension plan, members transferred, Reg. 8500(9)
 - treaty protection, Canada-U.S. Tax Treaty:Art. XIII:8
- Reorganization or acquisition transaction**
 - defined, for stock buyback tax, 183.3(1)
- Repaid amount (tax shelter investment)**
 - defined, 143.2(10)
- Repair**
 - automobile, *see* Automobile: operating costs
- Repayment**, *see also* Reimbursement
 - amount previously included in income, 20(1)(m.2)
 - application to other taxes, 164(2)
 - employment insurance benefits, 60(n), (v.1)
 - government assistance, *see* Assistance/government assistance: repayment of
 - inducements, 20(1)(hh)
 - overpayment of interest, by taxpayer, 164(3.1)
 - deduction for, 20(1)(ll)
 - pension benefits, 60(j.04)
 - policy loan, 60(s)
 - Quebec Parental Insurance Plan benefits, 60(g)
 - shareholder’s loan, 20(1)(j)
 - tax, *see* Refund
- Repayment period**
 - defined, for Lifelong Learning Plan, 146.02(1)
- Repeal**
 - legislation, *Interpretation Act* s. 25(1)
 - regulations, *Interpretation Act* s. 31(4)
- Replacement cost of property**
 - value of inventory, 10(4)
- Replacement obligation**
 - corporation in financial difficulty, exemption from non-resident withholding tax, 212(3)
- Replacement property**, *see also* Exchanges of property
 - defined
 - for capital property, 44(5)
 - for depreciable capital property, 13(4), (4.1)
 - for Home Buyers’ Plan, 146.01(1)
 - shares, *see* Replacement share
 - taxable Canadian property
 - capital property, 44(5)(c), (d)
 - depreciable property, 13(4.1)(c), (d)
- Replacement share**
 - defined, for small business investment capital gain rollover, 44.1(1)
- Repo agreement**, 260(1)“securities lending arrangement”
- Reportable account**
 - defined, for Common Reporting Standard, 270(1)
- Reportable jurisdiction**
 - defined
 - for Common Reporting Standard, 270(1)
 - for digital platform operator reporting rules, 282(1)
- Reportable jurisdiction person**
 - defined, for Common Reporting Standard, 270(1)
- Reportable period**
 - defined, for digital platform operator reporting rules, 282(1)
- Reportable person**
 - defined, for Common Reporting Standard, 270(1)
- Reportable property**
 - defined, 128.1(10)
 - reporting of, required, 128.1(9)
- Reportable seller**
 - defined, for digital platform operator reporting rules, 282(1)
- Reportable transaction**
 - mandatory disclosure rules
 - defined, 237.3(1)
 - information return required, 237.3(2)
 - exception for clerical or secretarial services, 237.3(4)
 - filing by one person before 2023 constitutes filing by all, 237.3(4)
 - filing deadline, 237.3(5)
 - penalty for failure to file, 237.3(8), (8.1)
 - reassessment deadline 3 years after filed, 152(4)(b.5)
 - transactions with non-residents
 - defined, 233.1(1)
 - information return required, 233.1(2), (3)
- Reportable uncertain tax treatment**
 - defined, 237.5(1)
 - requirement to report, 237.5(2)

Reported

- meaning of, for insurer, 138(12.3)

Reported reserve (of insurer)

- defined, Reg. 1408(1)

Reporting corporation

- defined, for uncertain tax treatment rules, 237.5(1)
- required to report uncertain tax treatment, 237.5(2)

Reporting-due day

- defined
- for CCUS climate risk disclosure, 211.93(1)
- for CCUS knowledge sharing, 211.92(1)

Reporting entity

- electronic funds transfer reporting
- defined, 244.1
- obligation to file, 244.2(1), 244.6
- foreign affiliate reporting
- defined, 233.4(1)
- obligation to file, 233.4(4)
- foreign property reporting
- defined, 233.3(1)
- obligation to file, 233.3(3)

Reporting financial institution

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

Reporting fiscal year

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

Reporting of foreign owners of bank accounts, see Common Reporting Standard**Reporting partnership**

- defined, re transactions with non-residents, 233.1(1)

Reporting period

- defined
- for CCUS knowledge sharing, 211.92(1)
- for construction payment reporting, Reg. 238(3)
- for GST/HST-related provisions, *Excise Tax Act* 123(1)

Reporting person

- defined
- re transactions with non-residents, 233.1(1)
- re qualified investments, 221(1)

Reporting platform operator

- defined, for digital platform operator reporting rules, 282(1)

Reporting requirements, see Information return**Reporting taxation year**

- defined, for CCUS climate risk disclosure, 211.93(1)

Repossession of property

- effect on creditor, 79.1
- capital gains reserve, 79.1(3)
- deemed cost of seized property, 79.1(6)
- foreign resource property, 79.1(2.1)
- in same taxation year as sale, 79.1(5)
- inventory reserve, 79.1(4)
- effect on debtor, 79

Representation allowances, not income, 6(1)(b)(iii), (iv)**Representation expenses**

- deductible, 20(1)(cc)
- deemed deducted as depreciation, 13(12)
- election to defer, 20(9), Reg. 4100

Representative

- of deceased taxpayer, *see* Legal representative of deceased taxpayer
- of government entity, defined, 241(10)
- of taxpayer, disclosure of information to, 241(5)

Representative of deceased taxpayer, see Legal representative of deceased taxpayer**Repricing of stock options, 110(1.7), (1.8)****Repurchase of equity, see** Stock buyback tax**Repurchase of shares, 260(1)**“securities lending arrangement”**Required statement**

- defined, Reg. 809(4)

Requirement, see Demand; Garnishment for taxes unpaid**Res judicata, 169(2)****Rescheduling of debt, expenses deductible, 20(1)(e)(ii.2), 20(1)(e.1)(iii)****Research and development, see** Scientific research and experimental development**Research grant**

- receipt of, income, 56(1)(o)
- refund of, 56(1)(p)
- repayment of, deductible, 60(q)

Reserve

- allowed, 20(1)(l)–(o)
- amalgamation, on, 87(2)(g), (i), (j)
- amount not due until later year, 20(1)(n)
- no deduction in certain circumstances, 20(8)
- bond premium, *see* unamortized bond premium (below)
- capital gain, 40(1)(a)(iii), 40(2)(a)
- 5-year reserve, 40(1)(a)(iii)
- 10-year reserve
- intergenerational transfer of business, 40(1.2)
- transfer of farm property or small business shares to child, 40(1.1)
- transfer to employee ownership trust, 40(1.3)
- donation to charity of non-qualifying security, 40(1.01)(c)
- disallowed in year of death, 72(1)(c)
- on exchange of property, 44(1)(e)(iii)
- where property repossessed by creditor, 79.1(3)
- contingent account, limitation on deductibility, 18(1)(e)
- corporation that is member of partnership, 34.2(11)
- credit unions, Reg. Part VI
- debt forgiveness, 61.2–61.4
- defined
- for capital gains, 40(1)(a)(iii)
- for large corporations tax, 181(1)
- for registered labour-sponsored venture capital corporations, 204.8(1)
- disallowed, 18(1)(e), 20(7)
- donation of non-qualifying security to charity, 40(1.01)(c)
- disallowed in year of death, 72(1)(c)
- doubtful debts, 12(1)(d), 20(1)(l)
- exchange of property, 44(1)(e)(iii)
- foreign exchange restriction, 91(2), (3)
- goods not delivered, 12(1)(e), 20(1)(m)
- guarantees etc., for, 12(1)(d.1)
- impaired debts, 20(1)(l)(ii)
- imputed to spouse on death of taxpayer, 72(2)
- insurance agent or broker, 32
- insurer, *see* Insurance corporation: policy reserves; Insurance corporation: reserve for unpaid claims
- inventory, 20(1)(n)
- where property repossessed by creditor, 79.1(4)
- life insurer’s, 138(3)
- limitation on deductibility, 18(1)(e)
- manufacturer’s warranty, 20(1)(l), (m), (m.1), (n), (o)
- maximum cumulative, of credit union, 137(6)“maximum cumulative reserve”
- negative, of insurer, 20(1)(e.1), 20(22), Reg. 1400(2)
- not deductible, 18(1)(e), 20(7)
- quadrennial survey, 12(1)(h), 20(1)(o), Reg. 3600
- qualifying transitional income (corporate partner), 34.2(11)
- reported (insurer), Reg. 1408(1)
- sectoral, defined, 20(2.3)
- services not rendered, 12(1)(e), 20(1)(m)
- transportation tickets, 20(6)
- unamortized bond premium, 20(1)(m.3)

Index

- Reserve** (*cont'd*)
- income inclusion in following year, 12(1)(d.2)
 - undelivered food or drink, 20(6)
 - unearned commissions, 32
 - unpaid claims, *see* Insurance corporation: unpaid claims reserve adjustment
 - unpaid insurance policy claims
 - deduction, life insurance business, 138(3)(a)(ii)
 - deduction, non-life insurance business, 20(7)(c)
 - limitation, 18(1)(e.1)
 - unrealized receivables, 20(1)(n)
 - wind-up, on, 88(1)(e.1)
 - year of death, not deductible for, 72(1)
- Reserve adjustment**
- life insurance corporations capital tax, 190.11
- Reserve amount**
- re resource property, defined, 66(15)
- Reserve deficiency**
- defined, Reg. 1403(8)(c)
 - revision of policy lapse rates, Reg. 1403(8)–(10)
- Reserve transition amount**
- defined, for IFRS transitional rules for insurers, 138(12)
- Reservoir**
- substances injected into, deduction for, 20(1)(mm)
- Residence**, *see* Home
- Resident beneficiary**
- defined, 94(1)
- Resident compensation**
- defined, Reg. 8300(1)
- Resident contributor**
- defined, 94(1)
- Resident of Canada**
- absent from Canada
 - child care, moving, and attendant expenses, 64.1
 - becoming, *see* Becoming resident in Canada
 - ceasing to be, *see* Ceasing to be resident in Canada
 - corporate emigration, 219.1
 - corporation, 250(4)
 - deemed, 250
 - for capital gains exemption, 110.6(5)
 - tuition credit, 118.5(2)
 - defined, 250
 - authorized foreign bank, 212(13.3)
 - non-resident trust, 94(3)(a); *Income Tax Conventions Interpretation Act* s. 4.3
 - entitled to U.S. treaty benefits, Canada-U.S. Tax Treaty:Art. XXIX-A:2
 - extended meaning of, 250(1), (2)
 - former, *see* Former resident
 - former, deemed employed in Canada, 115(2)(c)
 - income earned in a province, Reg. 2601
 - liability for tax, 2(1)
 - ordinarily, meaning of, 250(3)
 - part-year, *see* Part-year resident
 - partnership, *Income Tax Conventions Interpretation Act* s. 6.2
 - person deemed not due to tax treaty, 250(5)
 - regulations re, 214(13)
 - returning, 128.1(6), (7)
 - short-term, 128.1(4)(b)(iv)
 - treaty purposes, Canada-U.S. Tax Treaty:Art. IV
 - trust, deemed, 94(3)(a); *Income Tax Conventions Interpretation Act* s. 4.3
- Resident portion (of trust)**
- defined, 94(1)
 - included in deemed-resident trust's income, 94(3)(f)(ii)
- Residential property**
- defined, for minimum tax purposes, 127.52(3)
 - partnership investing in
 - capital cost allowance limitation, 127.52(2)
- Residential schools settlement**, *see* Indian Residential Schools Settlement trust
- Residual balance (upon debt forgiveness)**
- defined, 80(14)
 - included into income, 80(13)
- Residual portion (on disposition of specified debt obligation)**, *see also* Current amount (on disposition of specified debt obligation)
- application of, 142.4(4)
 - defined, 142.4(8)
 - re disposition by financial institutions, Reg. 9200(1)
- Resman Holdings TCC case overruled**, 66.1(6)“Canadian exploration expense”(d)(i), 66.1(9)(a)
- Resource**
- defined, Reg. 1206(1)
 - mineral, *see* Mineral resource
- Resource activity**
- defined, for resource allowance claims, Reg. 1206(1)
- Resource allowance**, 20(1)(v.1) [repealed], Reg. 1210 [repealed]
- Resource expenses**, *see also* Canadian development expense; Canadian exploration expense; Canadian oil and gas property expense
- amounts recovered included in income, 59
 - Canadian development expenses, 66.2
 - Canadian exploration and development expenses, 66(1)
 - Canadian exploration expenses, 66.1
 - Canadian oil and gas property expenses, 66.4
 - change of control, rules, 66.7(10), (11)
 - flow-through shares, 66(12.6)–(12.74), *see also* Flow-through shares
 - flow-through to shareholder, 66(12.6), (12.62), (12.64)
 - foreign exploration and development expenses, 66(4)
 - joint exploration corporation, 66(10)–(10.4)
 - limited partner, at-risk rules, 66.8
 - minimum tax, 127.52(1)(e), (e.1)
 - partnership, of, 96(1)(d)
 - reduction of, on debt forgiveness, 80(8)
 - successor rules, 66.7
 - “warehousing” prohibited, 66(19)
- Resource income**
- manufacturing profits, Reg. 5203
- Resource profits**
- defined, Reg. 1204(1.1), 5202
- Resource property**
- Canadian, *see* Canadian resource property
 - carved-out income, *see* Carved-out income
 - deceased taxpayer's, 70(5.2)
 - disposition
 - consideration for, on amalgamation, 87(2)(p)
 - involuntary, 59.1
 - reserve for uncollected amount
 - income in later year, 59(2)
 - expropriation, 59.1
 - foreign, *see also* Foreign resource property
 - proceeds of disposition, 59(1)
 - partnership, of, 96(1)(d)
 - rules for trusts, 104(5.2)
 - timber, *see* Timber resource property
- Respiratory aids**
- medical expense, Reg. 5700(c), (c.1), (c.2)
- Respite care**, *see* Attendant; Nursing home
- Restaurant relief (COVID)**, Reg. 8901.1(2)(b)(ii), *see also* Qualifying tourism or hospitality entity
- Restricted farm loss**
- addition to adjusted cost base of land, 53(1)(i)

Index

- Restricted farm loss (*cont'd*)
- amalgamation, on, 87(2.1)
 - carryover of, 111(1)(c)
 - deduction by partner where partnership disposes of land, 101
 - defined, 31(1), (1.1), 111(9), 248(1)
 - determination of, by Minister, 152(1.1), (1.2), (1.3)
 - limitation on deductibility, 31(1), 111(3)
 - partnership, from, 96(1)
 - reassessment, 152(6)(c)
 - reduction of, on debt forgiveness, 80(3)(c)
- Restricted financial institution**, *see also* Financial institution; Taxable RFI share
- defined, 248(1)
 - dividends received on term preferred shares, 112(2.1)
 - receiving dividends on taxable RFI shares
 - • where shares acquired under securities lending arrangement, 260(9)
- Restricted financial institution (RFI) shares, taxable**
- tax on dividends received by restricted financial institution, 187.3
 - • information return, 187.5
 - • partnership, 187.4
- Restricted interest and financing expense**
- carryforward, 111(1)(a.1)
 - defined, 111(8), 248(1)
- Restricted investment**
- defined, for pooled registered pension plan, 147.5(1)
- Restricted property (for non-resident trust rules)**
- defined, 94(1), 94(14)
 - • deemed, on indirect transfer to trust, 94(2)(b)
 - determination of value when contributed to deemed-resident trust, 94(9)
 - FAPI on contribution of to certain trusts, 94.2(1)(b)(ii)
- Restrictive covenant (or non-competition payment)**
- allocation of price paid, 68(c)
 - defined, 56.4(1)
 - employment income from
 - • taxable when receivable after 3 years, 6(3.1)
 - income from
 - • deduction for bad debt, 60(f)
 - • • bad debt recovered, 56(1)(m)
 - • included in income, 56.4(2)
 - • non-resident withholding tax, 212(1)(i), 212(13)(g)
 - • succession planning exclusion, 56.4(7)
- Restructuring of debt, expenses deductible**, 20(1)(e)(ii.2), 20(1)(e.1)(iii)
- Retention of books and records**, 230(4), (4.1)
- Retirement benefits**
- defined, Reg. 8500(1)
 - while continuing employment (phased retirement), Reg. 8503(16)–(25)
- Retirement compensation arrangement**
- administration of, corporation exempt, 149(1)(o.1)(i)(B)
 - advantage, tax on, 207.5(1)“advantage”, 207.62
 - amount paid in respect of
 - • withholding of tax, 153(1)(p)–(r)
 - amount payable under trust, not income, 12(1)(m)(ii)
 - amounts received by employer under, includable in income, 12(1)(n.3)
 - amounts transferred under, deduction from income, 60(j.1)
 - benefits under
 - • deduction from income re, 60(t)
 - • includable in income, 56(1)(x), (z)
 - • not includable in employee’s income, 6(1)(a)(ii)
 - • received by another
 - • • joint and several liability for tax on, 160.3
 - • whether eligible for pension income splitting, 60.03(1)“eligible pension income”(b)(i)(A)
 - • contribution to
 - • • tax on, 207.7(1)
 - • withholding, Reg. 103(7)
 - • creation of trust, 207.6(1)
 - • deduction for contributions to
 - • • by employee, 8(1)(m.2), 60(t), (u)
 - • • by employer, 18(1)(o.2), 20(1)(f)
 - • defined, 248(1), Reg. 6802
 - • disposition of interest in
 - • • amount included in income, 56(1)(y)
 - • • deduction from income re, 60(u)
 - • disposition of property by trust, 56(11)
 - • distribution by trust, 107.2
 - • emigration of employee, no deemed disposition, 128.1(10)“excluded right or interest”(a)(ix)
 - • employee benefit plan becoming
 - • • deemed contribution, 207.6(4)
 - • employer contribution deductible, 20(1)(r)
 - • excluded from non-resident trust rules, 94(1)“exempt foreign trust”(e)
 - • failure to withhold amounts in respect of, 227(8.2)
 - • foreign plan, *see* Foreign plan (pension plan)
 - • incorporated employee carrying on personal services business, 207.6(3)
 - • life insurance policies, 207.6(2)
 - • Member of Parliament, Reg. 6802.1
 - • money borrowed to make employee contributions
 - • • limitation on interest deductibility, 18(11)(e)
 - • non-resident compensation plan not retirement compensation arrangement
 - • • exception re “resident’s arrangement”, 207.6(5)
 - • payment of tax, 207.7(3)
 - • pension income credit not available, 118(8)(e), (f)
 - • pension income splitting on income from, 60.03(1)“eligible pension income”(b)(i)(A)
 - • portion of benefits taxable, 56(1)(a)(i)
 - • prescribed plan or arrangement, 207.6(6), Reg. 6802
 - • prohibited investment, tax on, 207.5(1)“advantage”, 207.61
 - • purchase price of interest in, paid by non-resident, 212(1)(j)
 - • refund of tax, 207.7(2)
 - • refundable tax, 207.5–207.7
 - • • defined, 207.5(1)
 - • • election re, 207.5(2)
 - • resident’s arrangement, 207.6(5)
 - • resident’s contribution, defined, 207.6(5.1)
 - • reversionary trust rules do not apply, 75(3)(a)
 - • severability of plan, 56(10)
 - • subject property
 - • • defined, 207.5(1)
 - • tax payable
 - • • advantage, 207.62
 - • • • waiver of tax, 207.64
 - • • prohibited investment, 207.61
 - • • • waiver of tax, 207.64
 - • • refundable tax, 207.7(1)
 - • transfer to another RCA, 207.6(7)
 - • • no withholding, Reg. 103(7)(a)
 - • trust
 - • • corporation administering, exempt, 149(1)(o.1)(i)(B)
 - • • creation of, 207.6(1)
 - • • defined, 207.5(1)
 - • • exempt from tax, 149(1)(q.1)
 - • • withholding tax, 153(1)(p)–(r), Reg. 103(7)
- Retirement counselling**, *see* Counselling services
- Retirement income, defined**, 146(1)
- Retirement income fund**, *see also* Registered retirement income fund
- registration of, 146.3(2)
 - • appeal from refusal, 172(3)(g), 180

Index

- Retirement income fund (*cont'd*)
 - deemed refusal by Minister, 172(4)(f)
 - revocation of, 146.3(11)–(13)
 - services relating to, non-deductible, 18(1)(u)
- Retirement payment**
 - single, from deferred profit sharing plan, 147(10.1), (10.2), Reg. 1503
- Retirement savings plan**, *see also* Registered retirement savings plan
 - appeal from refusal to register, 172(3)(b), 180
 - deemed registered, when, 204.2(3)
 - defined, 146(1)
 - foreign, *see* Foreign retirement arrangement
 - registration of, 146(2), (3)
 - deemed refusal by Minister, 172(4)(b)
 - services relating to, non-deductible, 18(1)(u)
- Retiring allowance**
 - defined, 248(1)
 - emigration, no deemed disposition of right, 128.1(10)“excluded right or interest”(d)
 - income, 56(1)(a)(ii)
 - legal costs of collecting or establishing right to
 - deduction for, 60(o.1)
 - income when recovered, 56(1)(1.1)
 - paid to non-resident, 212(1)(j.1)
 - election to file return, 217
 - repayment of, deductible, 60(n)(iii)
 - spread retroactively over prior years, 110.2, 120.31
 - transferred to RRSP or RPP, 60(j.1)
 - unpaid, 78(4)
 - withholding tax, 153(1)(c), Reg. 103(4), (6)(e)
- Retroactive effect**, *see also* Grandfathering
 - of amendments to pre-RSC 5th Supp. Act, ITAR 79
 - of interest, to date of effect of amendment, 221.1
 - of regulations, to date of public announcement, 221(2)
- Retroactive legislation**
 - GAAR amendments, 245(4)
 - GST disallowed as moving expense, 62(3)(f)
- Retroactive lump-sum payment**, *see* Lump-sum payment
- Retrospection**, ITAR 17(4)
- Return of income**
 - defined
 - for GST Credit, 122.5(1)
 - for OAS clawback, 180.2(1)
 - for teacher school-supplies credit, 122.9(1)
- Returned property**
 - from charity to donor, 110.1(16), 118.1(27), Reg. 3501.1
- Returning former resident**, 128.1(6), (7)
- Returns**, *see also* Information return
 - alternative to withholding tax, 216(1), 217
 - amended, 152(6)
 - bankrupt individual, 128(2)(e), (f)
 - carved-out income, tax on, 209(3)
 - corporation, 150(1)(a)
 - electronic filing mandatory, 150.1(2.1), (2.3)
 - death of beneficiary, 104(23)(d)
 - death of partner or proprietor, 150(4)
 - deceased taxpayer, 150(1)(b), (e)
 - deferred income plans
 - over-contributions, 204.3
 - property held by, 207.2
 - demand for, by Minister, 150(2)
 - designated persons, 150(1)(e)
 - due date, 150(1)
 - electronic filing of, 150.1
 - mandatory, 150.1(2.1), (2.3)
 - employee’s declaration, 227(2)
 - when to be filed, Reg. 107
 - where not filed, 227(3)
 - estates, 150(1)(c)
 - estimate of surtax, 180.1
 - estimate of tax, 151
 - excessive eligible dividend designation, 185.2(1)
 - extension of time for filing, 220(3)
 - failure to file, penalty
 - demand by Minister, 150(2)
 - penalty, 162(1)
 - repeated, 162(2)
 - trustees etc., 162(3)
 - false
 - penalty for, 163(2)
 - “understatement of income”, 163(2.1)
 - films, Reg. 225
 - guardian, etc., 150(1)(d), (e)
 - home insulation program, Reg. 224
 - incomplete, penalty, 162(5)
 - individual, 150(1)(d), (e)
 - in bankruptcy, 128(2)(e)
 - information, *see* Information return
 - late filing, penalty, 162(1)
 - Minister not bound by, 152(7)
 - non-profit organization, 149(12)
 - omission in, penalty, 163(2)
 - Part I, 150
 - Part I.2, 180.2(5)(a)
 - Part I.3, 181.6
 - Part II, 183(1)
 - Part II.1, 183.2
 - Part II.2, 183.4
 - Part III.1, 185.2(1)
 - Part IV, 187(1)
 - Part IV.1, 187.5
 - Part V, 189(6), (6.1)
 - Part VI, 190.2
 - Part VI.1, 191.4
 - Part VI.2, 191.5(8)
 - Part IX, 196(2)
 - Part IX.1, 197(4), (5)
 - Part X, 202(1)
 - Part X.1, 204.3
 - Part X.2, 204.7
 - Part X.3, 204.86
 - Part X.4, 204.92
 - Part XI.01, 207.07(1)
 - Part XI.1, 207.2
 - Part XI.2, 207.4
 - Part XI.3, 207.7(3)(a)
 - Part XI.4, 207.8(5)
 - Part XII.1, 209(3)
 - Part XII.2, 210.2(5)
 - Part XII.3, 211.2
 - Part XII.4 (qualifying environmental trust), 211.6(3)
 - Part XII.5, 211.8(2), 211.82
 - Part XII.6, 211.91(2)(a)
 - Part XIII.1, 218.2(5)
 - Part XIII.2 (optional), 218.3(3)–(9)
 - Part XIV, 219(3)
 - proof of, 244(17)–(19)
 - public authorities (Part XI.2), 207.4
 - refunds not payable until all filed, 164(2.01)
 - registered investment, 204.7
 - repeated failures to report an amount of income, penalty for, 163(1)
 - required of employee, 227(2)
 - where not filed, 227(3)

- Returns (*cont'd*)
- separate
 - amounts receivable on death, 70(2)
 - bankrupt individual, 128(2)(e), (f)
 - death of beneficiary, 104(23)(d)
 - death of partner or proprietor, 150(4)
 - off-calendar year adjustment, 34.1(9)
 - deductions in computing taxable income, 114.2
 - minimum tax carryover not applicable, 120.2(4)
 - minimum tax not applicable, 127.55
 - tax credits, 118.93
 - trustees etc., 150(3)
 - failure to file, penalty for, 162(3)
 - in bankruptcy, 128(2)(e)
 - trusts, 150(1)(c)
 - understatement of income, 163(2.1)
- Revenue Canada**, *see* Canada Revenue Agency
- Revenue guarantee**
- creates tax shelter, Reg. 3100(1)(b)(ii)
- Revenue reduction percentage**
- defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)
- Reverse attribution**, 74.5(11)
- Reverse takeover**, 256(7)(c)–(c.2)
- Reversionary trust**, 75(2), (3)
- non-resident trust, 94(8.1), (8.2)
- Reversionary year**
- defined, for functional currency rules, 261(1)
- Revised Statutes of Canada, 1985 (5th Supp.)**
- amendments to previous Act, ITAR 79
 - continuity of previous versions of Act, ITAR 75, 77
 - effective dates, ITAR 73
- Revocable living trust**
- excluded from qualifying disposition, 107.4(1)(e)
- Revocable plan**
- defined
 - for DPSP, 147(21), Reg. 8408(2)
 - for PRPP, 147.5(3), (4)
 - for RPP, 147.1(8), (9), 147.3(12), Reg. 8301(14)(a), 8305(2)(a), 8408(2), 8501(2), 8503(11), (15), 8506(4), 8511(2), 8515(9)
- Revocable trust**, 75(2), (3)
- Revocation of Canadian film/video production certificate**, 125.4(6)
- Revocation of designation**
- as qualified Canadian journalism organization, 168.1(2), (3)
- Revocation of elections**, 220(3.2)
- COVID-19 Canada Emergency Wage Subsidy and Canada Emergency Rent Subsidy, 125.7(10)
 - election by mutual fund trust for December 15 year-end, 132.11(1.1)
 - election to trigger capital gains exemption, 110.6(25)
- Revocation of film/video production services certificate**, 125.5(6)
- Revocation of registration**, *see also* Notice of intent
- amateur athletic association, 149.1(4.2), 168
 - appeal from, 172(3), 180(1), 204.81(9)
 - charity, 149.1(4.1), 168, 188, 188.1
 - deferred profit sharing plan, 147(14)–(15)
 - education savings plan, 146.1(12.1), (12.2), (13), (14)
 - labour-sponsored venture capital corporation, 204.81(6)–(9)
 - national arts service organization, 149.1(6.5)
 - pension plan, 147.1(11)–(13)
 - pooled registered pension plan, 147.5(24)–(28)
 - profit sharing plan, 147(14)–(15)
 - qualified donee, 149.1(4.3), 168
 - retirement income fund, 146.3(11)–(13)
 - retirement savings plan, 146(12)
- Revocation tax, charities**, 188
- Revoked corporation (registered labour venture capital)**
- defined (RLSVCC), 204.8(1), 211.7(1)
- Revoked plan**, *see* Deferred profit sharing plan
- Rider**
- deemed to be separate life insurance policy
 - for insurer's reserves, Reg. 1408(5), (6)
 - when added to pre-1990 policy, 12.2(10)
- Riding horses**
- eligible for children's fitness credit, Reg. 9400(5)
- Right of use or habitation (Quebec)**
- deemed to be trust, 248(3)
- Right to receive an amount**
- cost amount of, 248(1)“cost amount”(e)
- Right to receive production**
- deduction of matchable expenditure prorated, 18.1(4)
 - defined, 18.1(1)
 - disposition of, income inclusion, 12(1)(g.1), 18.1(6)
- Right to reduce**
- defined, for limitations on contingent expenditures, 143.4(1)
- Rights**
- exchange of, on amalgamation, 87(4.3)
- Rights or things**
- acquired by beneficiary
 - deemed cost, 69(1.1)
 - exclusions, 70(3.1)
 - transferred to beneficiaries, 70(3)
 - value of, included in income at date of death, 70(2)
- Rights to drill or explore**, *see* Exploration and drilling rights
- Rights to income**
- transfer of, 56(4)
- River improvements**
- capital cost allowance, Reg. 1102(7)
- River rafting relief (COVID)**, Reg. 8901.1(2)(b)(ix)(A)(V), *see also* Qualifying tourism or hospitality entity
- Road**, *see also* Specified temporary access road
- capital cost, 13(7.5)(b), Reg. 1102(14.3)
- Roadways**
- capital cost allowance, Reg. Sch. II:Cl. 1(g), Sch. II:Cl. 17
 - for mine, Reg. Sch. II:Cl. 10(l), Sch. II:Cl. 41
- Robinson case overruled**, 253.1(1)
- Rocking bed, as medical expense**, 118.2(2)(i)
- Rockmore Investments case overruled**, 125(7)“active business carried on by a corporation”
- Rogers Enterprises case paras. 46–49 overruled**, 245(1)“tax benefit”(c)
- Roller skating rink floor**, Reg. Sch. II:Cl. 10(i)
- “Rolling start” rule**, 13(27)(b), 13(28)(c), 13(29)
- Rollout**
- from trust, 107(2)
 - on partnership ceasing to exist, 98(3)
- Rollover**, *see also* Transfer of property
- accounts receivable, 22
 - amalgamation, on, 87
 - bare trust, to or from, 248(1)“disposition”(e)(i)
 - convertible debentures, 51
 - convertible property, 51
 - corporation, to, 85(1)
 - by partnership, 85(2)
 - capital property, 85(1)(c.2)
 - depreciable property, 85(1)(c)
 - farming inventory, 85(1)(c.2)
 - from shareholder, 85(1)
 - eligible property, 85(1.1)

Index

Rollover (*cont'd*)

- inventory, 85(1)(c.1)
- wholly-owned corporation, 85(1)(e.2), 85(1.3)
- death, on
 - registered retirement savings plan, 60(1)(v)(B.1), 146(8.8)–(8.91)
- to registered disability savings plan, 60.02
- to spouse or spouse trust, 70(6), (6.1)
- debt, in settlement of commercial debt obligation, 80(2)(h)
- demutualization of insurance corporation, 139.1(4)(a), (d)
- distress preferred share, converted to or from debt, 80.02(3)–(5)
- effect on shares held by former resident of Canada, 128.3
- exchange of property, 13(4), (4.1), 44
- exchange of shares, 51(1)
- exchange of shares on reorganization of capital, 86
- farm property, of, 70(9)–(9.31), 73(3)–(4.1)
- farming inventory, transfer to corporation, 85(1)(c.2)
- fishing property, of, 70(9)–(9.31), 73(3)–(4.1)
- foreign share for foreign share exchange, 85.1(5), (6)
- foreign spin-off, 86.1
- insurance business, 138(11.5), (11.94)
- insurer policyholder's rights, on demutualization, 139.1(4)(a), (d)
- internal reorganization, 86
- life insurance policy
 - to child, 148(8)
 - to spouse
 - inter vivos, 148(8.1)
 - on death, 148(8.2)
- mark-to-market property prohibited, 85(1.1)(g)(iii)
- mutual fund trust or corporation, 132.2
- net income stabilization account/NISA Fund No. 2
 - to corporation, 85(1)(c.1), 85(1.1)(i)
 - to spouse or spouse trust, 70(6.1)
- non-resident insurance business, of, 138(11.5)
- parent, to
 - on death of individual, 70(9.6)
 - on wind-up of corporation, 88(1)
- partnership, from
 - to new partnership, 98(1)
 - to partners on windup, 98(3)
 - to proprietorship, 98(5)
- partnership, to, 97(2)
- qualifying disposition to a trust, 107.4
- registered disability savings plan, to, on death, 60.02
- registered education savings plan, investment income to RDSP, 146.1(1.1), (1.2)
- registered pension plan to RPP annuity, 147.4
- registered retirement savings plan, on death, 60(1)(v)(B.1), 146(8.8)–(8.91)
- reorganizations, 84–88
- replacement property, 13(4), (4.1), 44
- reserves for year of death, 72(2)
- retiring allowance, to RRSP, 60(j.1)
- rights or things transferred to beneficiary, 69(1.1)
- SIFT units exchanged for shares of corporation, 85.1(7), (8)
- share for share exchange, 85.1
- shareholder, from, to corporation, 85(1)
 - eligible property, 85(1.1)
 - small business investments, 44.1
- spouse or spouse trust, to
 - death, on, 70(6), (6.1)
 - inter vivos, 73(1)
 - life insurance policy
 - inter vivos, 148(8.1)
 - on death, 148(8.2)
 - registered retirement savings plan, 146(8.8)–(8.91)
- stock options, of, on corporate reorganization, 7(1.4), (1.5)

- taxable Canadian property, 85(1)(i)
- transaction, *see* Rollover transaction
- transfer of insurance business by non-resident insurer, 138(11.5)
- treaty protection, Canada-U.S. Tax Treaty:Art. XIII:8
- trust, from
 - to beneficiary, 107(2)
 - to new trust, 107.4, 248(1)“disposition”(e), (f)
- trust, to, 107.4
- winding-up, on, 88(1)
- winding-up of partnership, on, 98(3)

Rollover period

- defined, re death of TFSA holder, 207.01(1)“exempt contribution”(a)

Rollover transaction, *see also* Rollover

- acquisition of specified debt obligation by financial institution, 142.6(5)
- defined, 142.6(6)

Roofers

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

Roth IRA

- conversion from regular ITA, whether taxable in Canada, 56(12), Canada-U.S. Tax Treaty:Art. XVIII:7
- included in definition of pension, Canada-U.S. Tax Treaty:Art. XVIII:3(b)
- not subject to non-resident trust rules, 94(1)“exempt foreign trust”(h)(ii)(D)

Rounding of amounts

- Child Tax Benefit, 122.61(7)
- inflation indexing, 117.1(3)
- pension calculations, Reg. 8311
- TFSA, 207.01(1)“TFSA dollar limit”(d)

Rousseau-Houle case overruled, 34.2, 245(4)

Rowboats

- capital cost allowance, Reg. Sch. II:Cl. 7

Royal Assent

- amendments in force, *Interpretation Act* s. 6(3)

Royal Canadian Mint, subject to tax, 27(2), Reg. 7100

Royal Canadian Mounted Police, *see also* Police officer

- disability pension exempt, 81(1)(i)
- provision of charity information to, for security purposes, 241(9), (9.1)

Royalties

- accrual to date of death, 70(1)(a)
- based on production or use, income, 12(1)(g)
- copyright, paid to non-resident, exempt, 212(1)(d)(vi)
- Crown, *see* Crown royalty
- defined, Canada-U.S. Tax Treaty:Art. XII:4, 6
- income from
 - whether specified investment business, 125(7)“specified investment business”
- motion picture films, paid to non-residents, 212(5)
- paid to non-resident, 212(1)(d)
 - back-to-back royalties, 212(3.9)–(3.94)
 - to U.S. resident, Canada-U.S. Tax Treaty:Art. XII
- paid to trust for non-resident, exemption, 212(9)(b)
- petroleum, natural gas, minerals
 - reimbursement for, 80.2
- prepaid, non-deductible, 18(9)
- production, defined, Reg. 1206(1)
- timber, 212(1)(e)
 - alternative tax, 216

Runway, *see* Aircraft: runway

S

S corporation, *see* United States: S corporation

SBB, *see* Small business bond

- SBDB**, *see* Small business development bond
- SBITC**, *see* Small business investment tax credit
- SCI**, *see* Specified corporate income
- SCP**, *see* Shared-custody parent; Solicitor-client privilege
- SDA**, *see* Salary deferral arrangement; Synthetic disposition arrangement
- SDO**, *see* Specified debt obligation
- SDSP**, *see* Specified disability savings plan
- SEA**, *see* Synthetic equity arrangement
- SEP**, *see* Surplus entitlement percentage
- SERP**, *see* Supplemental employee retirement plan
- SHT**, *see* Specified hedging transaction
- SIB**, *see* Specified investment business
- SIFT**, *see* Specified investment flow-through
- SIFT partnership**, *see also* SIFT trust
- defined, 197(1), (8), 197.1, 248(1)
 - distributions to partners
 - taxed in partnership at corporate rate, 197(2)
 - how taxed at partnership level, 96(1.11)
 - instalments of tax, 157(1), 197(6)
 - required to file information return, Reg. 229
 - required to file Part IX.1 partnership distributions tax return, 197(4)
 - requirement to post income information on CDS Innovations website, Reg. 229.1(2)
 - tax on buying back units, 183.3(1)“covered entity”(b)(iii)(A), 183.3(2)
- SIFT partnership balance-due day**
- defined, 248(1)
- SIFT trust**, *see also* SIFT partnership
- conversion to corporate form, *see* SIFT wind-up entity
 - defined, 122.1(1), (2), 248(1)
 - distributions to unitholders
 - deemed to be taxable dividend, 104(16)
 - reduced deduction to trust, 104(6)(b)B(ii)
 - taxed in trust at corporate rate, 122(1)(b)
 - not taxed provincially, 120(3)(d)
 - instalments of tax, 157(2)
 - province of residence, Reg. 2608
 - requirement to post income information on CDS Innovations website, Reg. 204.1(2)
 - tax on buying back units, 183.3(1)“covered entity”(b)(ii)(A), 183.3(2)
- SIFT trust wind-up event**, *see also* SIFT wind-up entity
- deemed settlement of debt, 80.01(5.1)
 - defined, 248(1)
 - no Part XIII.2 tax, 218.3(1)“assessable distribution”
 - wind-up into corporation, 88.1
 - other wind-up, 107(3), (3.1)
- SIFT wind-up corporation**
- amalgamation of, 87(2)(s.1)
 - defined, 248(1)
- SIFT wind-up entity**
- defined, 248(1)
 - exchange of employee stock options, 7(1.4)(b)(vi)
 - rollover on exchange of units for shares before 2013, 85.1(7), (8)
 - wind-up into corporation, 88.1
 - other wind-up, 107(3), (3.1)
- SIFT wind-up entity equity**
- defined, 248(1)
- SIN**, *see* Social insurance number
- SLA compensation payment**
- deductibility, 260(6)
 - defined, for securities lending arrangement, 260(1)
- SNQII**, *see* Specified non-qualified investment income (of registered plan)
- SPDRs**, *see* Standard & Poor 500 Depository Receipts
- SPI**, *see* Specified participating interest
- SPLC**, *see* Special purpose loss corporation
- SPTC**, *see* Share-purchase tax credit
- SR&ED**, *see* Scientific research and experimental development
- SR&ED form**
- defined, 162(5.3)
 - no deduction if prescribed information not provided, 37(11.1)
 - requirement to disclose claim preparer information on, 37(11)(b)
 - penalty for not disclosing, 162(5.1)
- SR&ED qualified expenditure pool**
- defined, 127(9)
 - investment tax credit for, 127(5)(a)(i), (ii)(A), 127(9)“investment tax credit”(a.1), (f)
 - additional, for Canadian-controlled private corporation, 127(10.1)(b)
 - transfer to other taxpayer, 127(13)–(17)
- SRA**, *see* Specified retirement arrangement
- SRTC**, *see* Scientific research tax credit (expired)
- SSHRC**, *see* Social Sciences and Humanities Research Council
- Sabbatical arrangement**, Reg. 6801(a)
- COVID-19 relief for 2020–22, Reg. 6801.1
 - effect on pension plan, Reg. 8508
 - exemption for recontributed amount received from plan, 81(1)(s)
- Sabel Investments case overruled**, 160(5)(a)
- Sable Island**
- prescribed intermediate zone for northern residents’ deduction, Reg. 7303.1(2)
- Safe harbour capital return**
- defined, for income-splitting tax, 120.4(1)
- Safe income**, 55(5)(b), (c)
- effect of, 55(2)
- Safe-income determination time**
- defined, 55(1)
- Safety deposit box**
- no deduction for use of, 18(1)(1.1)
- Salaries and Wages**, *see* Salary
- Salary**, *see also* Office or employment; Salary or wages
- accrued to date of death, 70(1)(a)
 - defined, 248(1)
 - for manufacturing and processing credit, Reg. 5202
 - garnishment of, *see* Garnishment for taxes unpaid
 - legal expenses of collecting or establishing right to, 8(1)(b)
 - paid by employee, to assistant or substitute, 8(1)(i)(ii)
 - certificate of employer, 8(10)
 - reimbursement of, 8(1)(n)
 - tax to be withheld from, 153(1)(a)
 - failure to withhold, 227(8.5)
 - unpaid, 78(4)
- Salary deferral arrangement**
- benefit from, income, 56(1)(w)
 - deduction to employer, 20(1)(oo), (pp)
 - limitation, 18(1)(o.1)
 - defined, 248(1)
 - emigration or immigration, no deemed disposition, 128.1(10)“excluded right or interest”(a)(vii), (b)
 - forfeited amounts
 - deductible from income, 8(1)(o)
 - includable in employer’s income, 12(1)(n.2)
 - inclusion in income from employment, 6(1)(a)(v), 6(1)(i), 6(11), (12), (14)
 - exception for non-residents, 6(13)

Salary deferral leave plan, Reg. 6801(b), Reg. 8508

Salary or wages

- defined, 248(1)
- re Canadian film/video tax credit, 125.4(1)
- re film/video production services credit, 125.5(1)
- journalist or editor, refundable credit, 125.6
- taxable, 5(1)

Sale

- accounts receivable, 22
- bond, by conversion, 51.1
- business, of, *see also* Ceasing to carry on business; Rollover
 - taxation year-end, 25(1)
 - to corporation for shares, 85(1)
 - to partnership, 97(2)
 - to spouse or controlled corporation, 24(2)
- defined, for information returns on securities transactions, Reg. 230(1)
- depreciable property, *see* Capital cost allowance: recapture; Depreciable property
- mortgage included in proceeds of disposition, 20(5), (5.1)
- shares, not at arm's length, 84.1
- by non-residents, 212.1

Sales suppression software, *see* Zapper software (or hardware)

Sales tax, federal, *see* Federal sales tax credit

Salesperson

- automobile
 - reasonable standby charge for use of, 6(2.1)
- automobile or aircraft
 - capital cost allowance, 8(11)
 - deemed, 13(11)
 - costs, deduction, 8(1)(j), 8(9)
- expenses, deduction, 8(1)(f)
 - certificate of employer, 8(10)
 - limitation, 8(4)

Same-sex marriage, *see also* Common-law partner

- religious charity entitled not to perform, 149.1(6.21)

Same-sex partner, *see* Common-law partner

Sand, 248(1)“mineral”

- tar, *see* Tar sands, defined; Tar sands ore

Saskatchewan, *see also* Province

- labour-sponsored venture capital corporation of
 - prescribed, Reg. 6700(a)(iv), (ix)
- northern, *see* Northern Canada
- Pension Plan, *see* Specified pension plan
- prescribed stock savings plan, Reg. 6705(b)
- tax rates, *see* introductory pages

Saskatchewan Pension Plan, *see* Specified pension plan

Satisfaction of obligation

- deemed not to be disposition, 49.1

Savings and credit unions, 137

Scale, metric, for retail use

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

Scandium, *see* Critical mineral

Scholarship

- employer-provided, whether taxable, 6(1)(a)(vi)
- receipt of, income, 56(1)(n)
 - exemption, *see* Scholarship exemption
- refund of, 56(1)(p)
- repayment of, deductible, 60(q)
- reportable on information return, Reg. 203

Scholarship exemption, 56(3), (3.1)

- defined, 56(3), (3.1)
- exempt from tax, 56(1)(n)(ii)
- not for post-doctoral students, 118.6(1)“qualifying educational program”
- only if scholarship intended to support studies, 56(3.1)(a)

- part-time students, limited to cost of program and materials, 56(3.1)(b)

School

- attendance at, child care deduction, *see* Secondary school

School board

- allowance from, exempt, 81(3) [before 2019]
- exempt from tax, 149(1)(c)

School fees, *see* Tuition fees

School supplies credit, *see* Teacher school-supplies credit

School trustee

- expense allowance exempt, 81(3) [before 2019]

Schooling allowance, provincial tax reduction, 120(2)

Scientific research and experimental development

- assistance, *see* Assistance/government assistance
- available-for-use rules, 37(1.2), 248(19)
- buildings
 - do not qualify as R&D expenditure, 37(8)(d)(i), Reg. 2900(11)
 - Canadian employees outside Canada, 37(1.4), (1.5)
- claim preparer information, *see* Claim preparer information (SR&ED claim)
- contingency fees not required to be reported, 237.3(1)“reportable transaction”(a)
- contracted out to non-arm's length person, 127(9)“qualified expenditure”(f)
 - transfer of investment tax credit, 127(13)–(16)
- credit for, *see* investment tax credit (below)
- debt forgiveness, effect of, 37(1)(f.1)
- deduction for, 37
 - amount included in income, 12(1)(v)
 - defined, 37(8), (13), 248(1), Reg. 2900(1)
 - election to use proxy amount for overhead, 37(8)(a)(ii)(B), 37(10), Reg. 2900(4)
 - expenditure pool, *see* SR&ED qualified expenditure pool
 - expenditures, 37(1)–(2), Reg. 2900(2)–(4)
 - change of control, 37(1)(h)
 - computation, 37(6.1)
 - deduction for, 37(1), (2)
 - election for alternative calculation, 37(8)(a)(ii)(B), 37(10)
 - excluded, 37(8)(d)
 - on amalgamation, 87(2)(1)–(1.2)
 - stock options, whether excluded, 143.3
 - filing deadline, 37(11), 220(2.2)
 - financial institution, by, 248(1)“scientific research and experimental development”
 - form required, *see* SR&ED form
 - investment tax credit
 - basic 20% credit, 127(9)“investment tax credit”(a.1)
 - extra 15% credit, 127(10.1)
 - refundable, 127.1
 - linked work, 37(13), Reg. 2900(1)(d)
 - meaning of, 37(9)(a)
 - overhead expenses, election for prescribed proxy amount
 - calculation of prescribed proxy amount, Reg. 2900(4)–(10)
 - exclusion of proxy amount from expenditure pool, 37(8)(a)(ii)(B)
 - filing of election, 37(10)
 - investment tax credit, 127(9)“qualified expenditure”
 - partnership, of
 - no carryforward, 96(1)(e.1)
 - no losses for passive partners, 96(1)(g)
 - performed outside Canada, 37(1.4), (1.5), (2)
 - pilot plants, qualify for investment tax credits, Reg. 2900(11)(c), (d)
 - prescribed form required, 37(11), 127(9)“investment tax credit”(m)
 - provincial super-allowance, 127(9)“super-allowance benefit amount”
 - proxy amount, prescribed, Reg. 2900(4)

Scientific research and experimental development (*cont'd*)

- reduction in, 127(11.1)(f) [repealed], 127(18)
- qualified expenditure
 - defined, 127(9)
 - prescribed, Reg. 2902
 - subsidiary's, on winding-up, 88(1.4)
- related corporations, of, 37(1.1)
- rent for buildings, does not qualify as R&D expenditure, 37(8)(d)(ii)
- salaries, directly engaged in SR&ED, Reg. 2900(4)
- sole-purpose R&D performer, Reg. 2902(a) (closing words)
- specified employee, paid to, 37(9.1)–(9.5)
- stock option cost, whether disallowed, 143.3
- super-allowance, 127(9)“super-allowance benefit amount”
- third party payment, 37(1)(a)(i.1), (ii), (iii)
- exclusion from prepaid expense rules, 18(9)(d)(i)

Scientific research and experimental development financing contract

- defined, 194(6), 248(1)

Scientific research corporation (non-profit)

- annual information return, 149(7)
- exemption for, 149(1)(j), 149(2)
- rules as to control, 149(8)
- rules as to income, 149(9)

Scientific research tax credit (expired), 127.3**Scott case (1975) overruled, 64.1****Scow, capital cost allowance, Reg. Sch. II:Cl. 7****Screenwriter (for Canadian film/video tax credit)**

- principal, whether Canadian, Reg. 1106(8)(c)

Script material

- defined, for Canadian film tax credit, 125.4(1)

Sculptor, see Artist**Sculpture, see also Cultural property; Listed personal property**

- Canadian, CCA claims allowed, Reg. 1102(1)(e)

Search-and-rescue volunteer

- exemption from employment income, 81(4)
- tax credit if performs 200 hours per year, 118.06(2)

Search warrant

- compliance required, 231.5(2)
- issue of, 231.3(1)–(4)

Second affiliate, see Foreign affiliate: second affiliate**Second instalment base**

- of corporation, 157(4), Reg. 5301(2)

Second term shared-use-equipment, for R&D investment tax credit

- defined, 127(9)

Second-tier financing structures

- application of FAPI, 95(6)

Secondary adjustment (transfer pricing), 247(12)–(16)**Secondary earner exemption (Canada Workers Benefit), 122.7(1.3)****Secondary recovery method, defined, Reg. 1206(1)****Secondary school**

- attendance at, child care deduction, 63(2)(b)(iii), 63(2.2)(a)

Secondary unit

- defined, for Multigenerational Home Renovation Tax Credit, 122.92(1)

Secrecy provision, 241**Secretarial services, see Clerical or secretarial services****Secretary, see Officer: corporation, of****Section 160 avoidance planning**

- defined, 160.01(1)
- penalty for, 160.01(2)

Section 160 avoidance transaction

- defined, 160.01(1)

Sectoral reserve

- defined, 20(2.3)

Secured creditor

- defined, 224(1.3)
- garnishment of property of, 224(1.2)
- interference with taxpayer's remittances, 227(5.2)–(5.4) (1995 draft, abandoned)
- withholding tax, liability for, 227(5), (5.1)(h)

Securities

- amalgamation, acquired in, 87(2)(e.2)
- Canadian, *see* Canadian security
- dealer, trader or agent, *see also* Broker; Registered securities dealer
 - fees of, deduction for, 20(1)(e), (bb)
 - ineligible for Canadian securities election, 39(5)(a)
 - return re securities lending arrangements and non-residents, 212(18)
 - tax re interest paid under securities lending arrangements to non-residents, 212(19)
- fair market value, ITAR 26(11)
- lending arrangements, *see* Securities lending arrangement
- prescribed, Reg. 6200
- publicly-traded, Reg. 4400
- V-day values, Reg. Sch. VII
- received for income debt, 76
- small business, Reg. 5100(2)
- transactions
 - information returns, Reg. 230
 - used or held in insurance or moneylending business
 - “eligible property” for transfer to corporation by shareholder, 85(1.1)(g)

Securities lending arrangement, 260, see also Dividend rental arrangement

- amount received deemed to be a dividend, 260(4)–(7)
- anti-avoidance rule, *see* Specified hedging transaction
- compensation payment
 - deductible, conditions, 260(6)
 - defined, 260(1)“SLA compensation payment”
 - no deduction generally, 18(1)(w)
- deemed dividend, 260(5)
 - dividend refund, 260(7)
 - no deduction for, 260(6)
- deemed not disposition, 260(2)
- defined, 260(1)
- disposition of right under, 260(3), (4)
- dividend compensation payment
 - deemed to be eligible dividend, 260(1.1), (5)
 - non-deductible, 18(1)(w)
- lender non-resident, effect, 260(8)
- non-resident withholding tax
 - amounts deemed to be interest, 260(8)
- special tax on securities dealers, 212(19)
 - return required, 212(18)
- qualified security, defined, 260(1)
- restricted financial institution receiving dividend on shares acquired under, 260(9)
- specified, *see* Specified securities lending arrangement

Security, see also Securities

- defined
 - for Part I.3 large corporation tax, Reg. 8605(4)
 - for stapled-security rules for SIFT trusts, 18.3(1)
 - for winding-up rules, 88(1) opening words
- granting of, not a disposition, 248(1)“disposition”(j), (k)
- non-qualifying, *see* Non-qualifying security
- qualified, *see* Qualified security

Security distribution

- defined, 260(1)

- Security for tax**, 220(4)–(4.4)
- defined, *Interpretation Act* 35(1)
 - departure tax, 220(4.5)–(4.71)
 - discharge, Reg. Part XXII
 - extends 10-year collection limitation period, 222(8)(b)
 - taxpayer becoming non-resident, 220(4.5)–(4.71)
- Security interest**
- defined
 - • for garnishment rules, 224(1.3)
 - • for thin capitalization rules, 18(5)
- Seeing Eye dog**, *see* Guide dog expenses
- Segregated fund (of life insurer)**
- defined, 138.1(1), 211(1), Reg. 1408(1)
 - merger of, 138.2
 - related, *see* Related segregated fund trust
 - rules re, 138.1
 - trusts, 138.1
 - • election, Reg. 6100
 - • interest in, adjusted cost base, 53(1)(l), 53(2)(q)
- Segregated fund policies**
- defined, 138.1(1)(a)
- Seismic testing**
- off-the-shelf data, no renunciation of cost of, 66(12.6)(b.1)
- Seizure**
- chattels, of, 225
 - documents, of, 231.3(5)–(8)
 - • compliance required, 231.5(2), 232(15)
 - • copies, 231.5(1)
 - • where privilege claimed, 232(3), (4)–(7)
 - property, for non-payment of debt
 - • effect on creditor, 79.1
 - • • deemed cost of property, 79.1(6)
 - • • foreign resource property, 79.1(2.1)
 - • • no deduction for principal portion of bad debt, 79.1(8)
 - • effect on debtor, 79
- Select Luxury Items Tax**, *see* Luxury Items Tax
- Self-benefit trust**, *see* Alter ego trust
- Self-contained domestic establishment, defined**, 248(1)
- Self-employed person**
- Canada Pension Plan contributions, credit, 118.7:B(c)
 - home office expenses, conditions for deductibility, 18(12)
- Seller**
- defined, for digital platform operator reporting rules, 282(1)
- Selling cost**, *see* Adjusted selling cost (re investment tax credits)
- Senate Appointment Consultations Act**
- candidates and parties under
 - • political contribution credit, 127(3)
 - • records re monetary contributions, 230.1
 - nominee under
 - • political contribution credit, 127(3)
 - • records re monetary contributions, 230.1
- Senegal**
- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(g) [repealed]
- Senior citizen**, *see* Age
- Separate business**
- deemed
 - • for CCA, life and non-life insurance businesses, Reg. 1101(1a)
 - • for FAPI, 95(2)(a.1)(iii), (a.2)(iv), (a.3)(iii), (a.4)(iii), (b)(i), (b)(ii), (k)(i)
 - separate CCA classes for each business, Reg. 1101(1)
- Separate classes for capital cost allowance**, Reg. 1101
- automobile costing over \$24,000, Reg. 1101(1af)
 - buildings, Reg. 1101(1ac)–(1ae), (5b), (5b.1)
 - Canadian film or video production, Reg. 1101(5k.1)
 - certified productions, Reg. 1101(5k)
 - combustion turbines, Reg. 1101(5t)
 - computer equipment and software, Reg. 1101(5p), 1103(2g)
 - computer software tax shelter property, Reg. 1101(5r)
 - computer tax shelter property, Reg. 1101(5r)
 - deemed depreciable property, 13(5.2)(c), 13(21.2)(e)(ii), Reg. 1101(5g)
 - different businesses, properties for, Reg. 1101(1)
 - different mines, properties for, Reg. 1101(4a)–(4d)
 - excavating or moving equipment, Reg. 1101(5l)
 - exempt properties, Reg. 1101(5o)
 - fax machine, Reg. 1101(5p), 1103(2g)
 - industrial mineral mines, Reg. 1101(4)
 - leasehold interest in real property, Reg. 1101(5h)
 - leasing properties, Reg. 1101(5c), (5n)
 - life insurance and other insurance business, Reg. 1101(1a)
 - manufacturing and processing property, Reg. 1101(5s)
 - mine property, Reg. 1101(4g), (4h)
 - outdoor advertising sign, Reg. 1101(5l)
 - partnership and non-partnership property, Reg. 1101(1ab)
 - photocopier, Reg. 1101(5p), 1103(2g)
 - pipeline costing over \$10,000,000, Reg. 1101(5i), (5j)
 - railway assets, Reg. 1101(5d)–(5e)
 - rental and non-rental property, Reg. 1101(1ae)
 - scientific research expenditures, 37(6)
 - software, Reg. 1101(5p), 1103(2g)
 - telecommunication spacecraft, Reg. 1101(5a)
 - telephone equipment, Reg. 1101(5p), 1103(2g)
 - timber limits and cutting rights, Reg. 1101(3)
 - vessels, Reg. 1101(2), (2a), (2b)
 - • conversion cost, 13(14), (17)
- Separate return**, *see* Returns: separate
- Separate school board**, *see* School board
- Separated organics**
- defined, Reg. 1104(13)
 - gas produced by, Reg. 1104(13)“biogas”
- Separation agreement**
- defined, 248(1)
 - payments under
 - • deductible by payor, 60(b), (c)
 - • taxable to recipient, 56(1)(b), (c)
- Series**
- of shares, 248(6)
 - of transactions, 248(10)
- Servant**
- defined, 248(1)“employment”
- Service**
- proof of, 244(5), (6)
- Service animal**
- medical expense credit, 118.2(2)(l)
- Service cost**, *see* Adjusted service cost (re investment tax credits)
- Service pension**
- exemption, 81(1)(d)
 - other country, from, 81(1)(e)
- Service-related injuries, payments exempt**, 81(1)(d.2)
- Services**
- defined, for FAPI, 95(3)
 - not rendered, reserve for, 20(1)(m), 20(24), (25)
 - provision of, along with property disposed of
 - • allocation rule, 68
 - rendered, amounts receivable for, 12(1)(b), 12(2)
 - to be rendered
 - • amount received for, income, 12(1)(a)(i), 12(2)
 - • • repayment of, deductible, 20(1)(m.2)
 - • • consideration for, not “outlay” or “expense”, 66(15)“outlay” or “expense”

Servitude

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

Set-off

- debt owing by Crown, against taxes owing, 224.1
- • communication of information to facilitate, 241(4)(d)(xiii)
- interest, on instalment payments, 161(2.2)
- refund of tax, against other debt owing to Crown or province, 164(2)
- • Part X refunds, 203
- transfer pricing adjustments, *see* Transfer pricing capital setoff adjustment; Transfer pricing income setoff adjustment

Set-top box, *see* Television set-top box**“Settled” (debt)**

- deemed, 80.01
- defined, 80(2)(a)
- • for distress preferred shares, 80.02(2)(c), 80.02(7)(a)

Settlement, structured, *see* Structured settlement**Settlement of debt**, *see also* Debt forgiveness

- deemed, 80.01
- • on amalgamation, 80.01(3)
- • on debt becoming statute-barred, 80.01(9)
- • on debt parking, 80.01(6)–(8)
- • on share ceasing to be distress preferred share, 80.02(7)
- • on winding-up, 80.01(4)
- distress preferred share, on winding-up, 80.01(5)
- effect of, 80(3)–(13)
- foreign affiliate’s gain or loss on, 95(2)(i)
- simultaneous, 80(2)(i)
- subsequent payment following deemed settlement, 80.01(10)

Settlement of litigation

- property transfer, 49.1
- Tax Court appeal, 169(3)
- wrongful dismissal, 248(1)“retiring allowance”

Settlor (of trust)

- defined, 108(1)
- • for loan by corporation to non-resident, 17(15)
- reported to CRA starting 2022, Reg. 204.2(1)(a)

Severance pay, *see* Retiring allowance**“Shall”**

- meaning of, *Interpretation Act* s. 11

Share

- acquired before 1976
- • cost base, deductions from, 53(2)(e)
- acquisition of
- • by corporation, deemed dividend, 84(3), (6)
- • deemed, 256(8)
- “actual cost”, ITAR 26(15)–(17)
- agreement to issue, to employees, 7(1)
- average annual rate of return, capital gains deduction, 110.6(9)
- bankrupt corporation, of
- • deemed disposition of, 50(1)
- block of, defined, Reg. 4803(1)
- bought back by corporation
- • amount paid for unpaid dividends deemed dividend substitute, 183.1(4)
- cancellation, deemed dividend, 84(3), (6)
- capital property, deemed, 39(4)
- capital stock of family farm corporation, of, 110.6(1)“share”
- capital stock of family fishing corporation, of, 110.6(1)“share”
- class of, series of, 248(6)
- common, defined, 248(1)
- • for mutual fund rollover rules, 132.2(2)
- controlled corporation, of
- • disposition of, 40(2)(h)
- convertible, exchanged for other shares, 51; ITAR 26(24)

- cost base of
- • additions to, 53(1)(b)–(d), (f.1)
- • deductions from, 53(2)(a)
- • deemed dividend added to, 53(1)(b)
- deemed benefit from
- • cost base, addition to, 53(1)(j)
- deemed disposition of, to corporation, 84(9)
- deemed interest on, 258(5)
- deemed receipt of, on merger, 87(1.1)
- defined, 248(1)
- • for insurance demutualization, 139.1(1)
- • for non-resident corporation with no share capital, 93.2(2)
- disposition of
- • capital gain or loss, 40(1)
- • deemed, on death, 70(5)
- • for insurance demutualization, 139.1(1)
- • order of, for employee stock option benefit, 7(1.3)
- • subsequent to debt forgiveness, deemed capital gain, 80.03(2), (4)
- • where dividend previously paid, stop-loss rules, 112(3)
- distribution of, by corporation, 84(5)
- donation of or donation after sale of, capital gain exempted, 38(a.1)
- “equity” defined, 204
- exchanged for shares, 85.1; ITAR 26(26)
- • amalgamation, on, 87(4.1), (4.2)
- • computation of paid-up capital, 85.1(2.1)
- • reorganization of capital, 86(1); ITAR 26(27)
- • rules, 7(1.5), 112(7)
- “excluded” defined, 204
- expense of issuing, 20(1)(e)
- exploration and development, 66.3(1)
- fair market value, ITAR 26(11.1), (11.2)
- flow-through, 66(12.6)–(12.75), Reg. 6202.1
- foreign affiliate, of, *see also* Foreign affiliate
- fractional interest, *see* Fractional share
- grandfathered
- • defined, 248(1)
- guaranteed, *see* Guaranteed shares
- held by trustee for employee, 7(2)
- included in single payment under DPSP, 147(10.1), (10.2)
- • deduction re amount, 110(1)(d.3)
- • disposal of, 147(10.4), (10.5)
- interest paid on money borrowed to purchase, 20(1)(c)
- issued in exchange for property, rollover, 85(1)
- issued in settlement of debt, 80(2)(g), (g.1)
- issued to avoid tax, by foreign affiliates, 95(6)(b)
- loan to shareholder/employee to purchase, 15(2.4)(c)
- loss on, 112(3), (3.1), (3.2), (4.3)
- mark-to-market rules, *see* Mark-to-market property
- non-arm’s length sale of, 84.1
- • by non-resident, 212.1
- non-capital property of partnership
- • loss on, 112(4.2)
- “non-participating, defined, 204“non-participating share”
- non-resident corporation, of
- • cost base, deductions from, 53(2)(b)
- not capital property
- • fair market value of, 112(4.1)
- • loss on, 112(4)
- paid-up capital in respect of class of, 84.2
- paid-up capital value, defined, 204
- payment for, no capital cost allowance, 18(1)(y)
- predecessor corporation, on amalgamation, 87(4)
- preferred, *see also* Preferred share; Term preferred share
- • deemed interest on, 258(3)
- • defined, 248(1)
- prescribed, Reg. 6201–6207
- • flow-through, Reg. 6202.1

Index

Share (*cont'd*)

- publicly-traded, Reg. 4400
- • V-day value, Reg. Sch. VII
- purchase of
 - • through series of transactions/events
 - • • tax on distribution of corporate surplus, 183.1(4)
 - • trustee, by, for employees of corporation, 7(6)
- qualified small business corporation
 - • capital gains deduction, 110.6(2.1)
 - • defined, 110.6(1)
 - • related person, 110.6(14)
 - • rules re, 110.6(14)
- received on amalgamation, ITAR 26(21)
- redemption, deemed dividend, 84(3), (6)
- registered charities, held by, 189(3)–(5)
- right to acquire
 - • shares deemed owned, where, 95(6)(a)
- sale of
 - • non-arm's length, 84.1
- short-term preferred, defined, 248(1)
- specified shareholder's
 - • adjusted cost base, 53(1)(d.3)
- subsidiary, of
 - • cost of, 52(7)
- tax-deferred preferred, amalgamation where, 83(7)
- taxable preferred, *see* Taxable preferred share
- term preferred, *see* Term preferred share
- value, whether deductible to issuer, 143.3(3)
- where deemed capital property, 54.2

Share buybacks, *see* Stock buyback tax

Share for share exchange, 85.1

Share-funding arrangement (registered pension plan), Reg. 8501(6.1)

Share of the capital stock of a family farm or fishing corporation

- defined, 70(10)
- rollover to children/grandchildren, 70(9)–(9.31), 73(3)–(4.1)

Share options

- employee, 7
- • where person ceases to be employee, 7(4)

Share-purchase tax credit, 127.2, 192–193 [expired]

Share repurchase transaction, anti-avoidance rule, 112(5.2)B(a)

Share transfer fees, deduction, 20(1)(g)

Shared-custody parent, *see also* Splitting, sharing or apportionment

- defined
 - • for Canada Child Benefit, 122.6
 - • for GST Credit, 122.5(3.01)
- division of Canada Child Benefit, 122.61(1.1)
- division of Climate Action Incentive (carbon tax credit), 122.8(4.1)
- division of GST/HST Credit, 122.5(3.01)–(3.04)
- division of Universal Child Care Benefit, *UCCB Act* s. 4(1)(a) [see Notes to 56(6)]
- is eligible individual for Canada Child Benefit, 122.6“eligible individual”

Shared-use-equipment

- defined, 127(9)

Shareholder

- appropriation of property to, 15(1), 69(4), (5), 84(2)
- automobile available to, 15(5), (7)
- benefit from corporation, 15(1), (7), (9)
 - • GST portion included, 15(1.3)
- loan forgiven, 15(1.2)
- deemed disposition of share to corporation, 84(9)
- defined, 248(1)

- disclosure of identity to CRA and the public, *see* Individuals with Significant Control (of corporations)
- exchange of shares in course of reorganization, 86(1)
- issue of stock rights to, 15(1)(c)
- loan to, by corporation, *see* Loan: shareholder, to, by corporation
- non-resident
 - • interest paid to, not deductible, 18(4)–(6)
 - • persons connected with, 15(2.1), 80.4(8)
- prospective
 - • benefit conferred on, by corporation, 15(1)
- share for share exchange, 85.1
- specified
 - • adjusted cost base of share, 53(1)(d.3)
 - • defined, 248(1)
- transfer of property by, to corporation, 85(1), (1.1)

Shareholder corporation

- “agreed portion” in respect of, 66(15)
- defined, 66(15)
- election by joint exploration corporation to renounce expenses to, 66(10)–(10.3) [repealed]
- payment made to joint exploration corporation
- • reduction in adjusted cost base of property received as consideration, 53(2)(f)

Shareholder loan, *see* Loan: shareholder to, by corporation

Shareholder's equity

- determination of, for LSVCC investment shortfall, 204.82(2.2)(b), (c)

Sharing, *see* Splitting, sharing or apportionment

Sheep

- basic herd maintained since 1971, deduction, 29
- breeding, 80.3(1)“breeding animals”

Sheet metal worker

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

Sheitel, *see* Wig, medical expense

Shelf, continental, *see* Continental shelf

Shell Canada case overruled, 20.3

Shellfish, *see* Ammonite gemstone

Shelter, *see* Tax shelter

Sherman case overruled, 127.531(b)

Sherway Centre case overruled, 20(1)(e)(iv.1)

Ship, *see also* Vessel

- non-resident's income from, exempt, 81(1)(c)
- operators, taxable income earned in a province, Reg. 410
- treaty provisions, Canada-U.S. Tax Treaty:Art. VIII:1–3, Canada-U.S. Tax Treaty:Art. XV:3, XXIII(3)
- used in international traffic, *see* International traffic

Shipping, *see* International shipping

Shoes/boots

- orthopaedic etc., medical expense, Reg. 5700(e)

Shopping, *see* Treaty shopping

Short-form amalgamation, 87(1.1), (2.11)

Short sale

- dividend paid on borrowed securities not deductible, 260

Short taxation year

- causes
 - • becoming or ceasing to be CCPC, 249(3.1)
 - • becoming or ceasing to be exempt, 149(10)
 - • becoming or ceasing to be financial institution, 142.6(1)
 - • change in control of corporation, 249(4)
 - • charity given notice of revocation, 188(1)
 - • reduction in (foreign affiliate) surplus entitlement percentage, 91(1.1)–(1.5)
- inclusion of FAPI, 91(1), (1.1)
- prorating of \$1 million threshold for Part II.2 stock buyback tax, 183.3(4)

- Short taxation year (*cont'd*)
- prorating of bank and life insurer surtax \$100m deduction, 123.6(2)B(a)(ii)C
 - prorating of base level deduction, 18(2.5)(b)
 - prorating of capital cost allowance, Reg. 1100(3)
 - prorating of deduction for injection substances, 20(1)(mm)(iii)
 - prorating of farmer's animal valuation rules, 28(1.3)
 - prorating of financial institutions capital tax, 190.1(2)
 - prorating of ITC expenditure limit, 127(10.6)(b), (c)
 - prorating of Part VI.1 tax dividend allowance, 191.1(6)(a)
 - prorating of Part VI.2 tax on banks and life insurers for 2022, 191.5(4)
 - prorating of refundable investment tax credit, 127.1(4)
 - prorating of resource deductions, 66(13.1)
 - prorating of small business deduction, 125(5)(b)
 - prorating of tax on investment income of life insurer, 211.1(4)
 - instalments, 211.3(2)A(b)
- Short-term preferred share**
- defined, 248(1)
- Shower**
- mechanical aid for getting into and out of, medical expense, Reg. 5700(g)
- Shutdown of business**, *see* Ceasing to carry on business; Winding-up
- Sickness and accident insurance**
- benefits taxable, 6(1)(f); ITAR 19
 - employee contributions to employee life and health trust deemed to be premiums if identified as such, 144.1(10)
 - employer's contribution a taxable benefit, 6(1)(e.1)
- Sidewalks, capital cost allowance**, Reg. Sch. II:Cl. 1(g)
- for mines, Reg. Sch. II:Cl. 10(l)
- Siemens-OSRAM spinoff**, Reg. 5600(h)
- Sift trust**, *see* SIFT trust [at beginning of "S" listings]
- Sight impairment**
- devices to assist person with, business expense, 20(1)(rr)
- Sightseeing tours relief (COVID)**, Reg. 8901.1(2)(b)(vi), *see also* Qualifying tourism or hospitality entity
- Sign language**
- interpretation service
 - • disability supports deduction, 64(a)A(ii)(A)
 - • medical expense credit, 118.2(2)(1.4)
 - training, medical expense credit, 118.2(2)(1.3)
- Signalling device**
- visual or vibratory, for person with hearing impairment, Reg. 5700(q.1)
- Significant interest**
- corporation, in a partnership
 - defined, 34.2(1)
 - debt settlement rules
 - • defined, 80.01(2)(b)
 - financial institutions
 - • defined, 142.2(2), (3)
 - financial institution holding, excluded from mark-to-market rules, 142.2(1)"mark-to-market property"(d)
 - pooled registered pension plan rules
 - • defined, 147.5(30)
 - RCA
 - • defined, 207.01(4), 207.5(1)
 - registered plan advantage rules
 - • defined, 207.01(4)
- Significant part of exempt capital gain attributable to unpaid dividends**, 110.6(8)
- Significant reduction in capital gain resulting from dividend**, 55(2)
- Signing bonus**, 6(3), 115(2)(c.1), 115(2)(e)(v)
- athlete or artist, Canada-U.S. Treaty Art. XVI:4
- Signs, outdoor advertising**, *see* Outdoor advertising structures
- Silden case confirmed**, 15(2.4)(e)
- Silica, included in definition of "mineral"**, 248(1)
- Silicon Graphics Ltd. case overruled**, 95(1)"controlled foreign affiliate"(b), 125(7)"Canadian-controlled private corporation"(b)
- Silver**, *see* Precious metals
- Simser case offset by deduction**, 64
- Simultaneous**
- dividends, designation of order, 89(3), 133(7.2)
 - settlement of debt obligations, designation of order, 80(2)(i)
- Singapore**, *see also* Foreign government
- stock exchange recognized, 262
- Singer**
- deduction from employment income, 8(1)(q)
- Single amount**
- defined
 - • for pooled registered pension plans, 147.5(1)
 - • for registered pension plans, 147.1(1)
- Single mine property**
- capital cost allowance, Reg. 1100(1)(y.2)
 - separate prescribed class, Reg. 1101(4g)
- Single purpose corporation**
- whether use of corporate property taxable to shareholder, 15(1)
- Single status, credit for**, 118(1)B(c)
- Single-tier alignment**
- defined (for corporate inclusion of partnership income), 34.2(1)
 - election by partnership, 249.1(8)
- Singular includes plural**, *Interpretation Act* s. 33(2)
- Sister**
- deemed not related on butterfly transaction, 55(5)(e)
 - dependent, 118(6)(b)
 - includes sister-in-law or in common-law, 252(2)(c)
 - sharing of RESP assets, 204.9(5)(c)(ii)
- Site, investigation of**, 20(1)(dd)
- Siwik case overruled**, 80.4(1.1)
- Six employees test**
- FAPI active business, 95(1)"investment business"(c)(i), (ii)
 - personal services business, 125(7)"personal services business"(c)
 - specified investment business, 125(7)"specified investment business"(a), (b)
- Ski operators relief (COVID)**, Reg. 8901.1(2)(b)(ix)(A)(II), *see also* Qualifying tourism or hospitality entity
- Skytrain trusts**
- anti-avoidance rule, 106, 108(1)"income interest"
- Sleights**
- capital cost allowance, Reg. Sch. II:Cl. 10(d)
- Small amounts owing (up to \$2) not payable**, 161.4
- Small business, investment in, by deferred income plans**, Reg. 4900(6), Part LI
- Small business bond**, 15.2 [no longer current]
- Small business corporation**
- attribution rules inapplicable, 74.4(2)(c)
 - business investment loss on share or debt of, 39(1)(c)
 - defined, 248(1)
 - disposition to child, 10-year reserve, 40(1.1)(c)
 - qualified, share of
 - • capital gains deduction, 110.6(2.1)
 - • defined, 110.6(1)
 - transfer to child, grandchild or other relative, *see* Intergenerational transfer
- Small business deduction**, 125
- associated corporations, 125(3)–(5)
 - "business limit", 125(2)
 - • special rules for, 125(5)

Index

- Small business deduction (*cont'd*)
 - corporation deemed member of partnership, 125(6.1)
 - credit union, 137(3), (4)
 - definitions, 125(7)
 - large corporation, restricted, 125(5.1)(a)
 - multiple access, provisions preventing, 125(6)–(6.3)
 - partnership, *see* Partnership
 - passive income, reduces SBD, 125(5.1)(b)
 - rules for business limit, 125(5)
 - two taxation years ending in year, 125(5)
- Small business deduction rate**
 - defined, 125(1.1)
- Small business investment capital gain rollover**, 44.1
- Small business investment corporation**
 - defined, Reg. 5101(1)
 - exemption from tax, 149(1)(o.3)
 - qualifies as RRSP or RRIF investment, Reg. 4900(6)(a)
- Small business investment limited partnership**
 - defined, Reg. 4901(2), 5102
 - eligible for RRSP or RRIF investment, Reg. 4900(6)(b)
- Small business investment tax credit**
 - calculation of, 127(9)“qualified small-business property” [repealed], 127(9)“specified percentage”(i)
 - not refundable, 127.1(2)“refundable investment tax credit”(d)(i)
- Small business investment trust**
 - defined, Reg. 4901(2), 5103
 - eligible for RRSP or RRIF investment, Reg. 4900(6)(c)
 - information return where interest claimed to be qualified investment, Reg. 221
- Small business property**, Reg. Part LI
- Small business security**
 - defined, Reg. 4901(2), 5100(2)
- Small-CCPC**
 - defined, 157(1.2)–(1.4)
 - instalment obligation, 157(1.1), (1.5)
- Small employer**
 - quarterly remittance of source deductions, Reg. 108(1.12)
- Small manufacturers' rule**, Reg. 5201
- Social assistance payment**
 - deduction from taxable income, 110(1)(f)(iii)
 - foster child, for, exempt, 81(1)(h)
 - inclusion in income, 56(1)(r), (u)
 - information return, Reg. 233
 - supplementing employment income, 56(1)(r)
 - eligible for child care deduction, 63(3)“earned income”(b)
- Social benefits repayment**, 180.2
- Social club**
 - dues not deductible, 18(1)(l)
 - exemption for, 149(1)(l), 149(2)
 - deemed a trust, 149(5)
- Social insurance number**, *see also* Business Number
 - application for, 221(1)(d.1), Reg. 3800
 - failure to provide, penalty, 162(5)(b), 162(6)
 - information return requiring
 - reasonable effort to obtain, 237(2)(a)
 - RESP contributions, 146.1(2)(g.3)
 - registration of RRIF under, 146.3(1)“registered retirement income fund”
 - requirement to provide, 221(1)(d.1), 237(1), (1.1)
 - attendant care receipts, 64(a)A(iii), 118.2(2)(b.1)(iv), 118.2(2)(c)(iii)
 - child care receipts, 63(1)
 - farm support payment slips, for, Reg. 236
 - partnership information return, Reg. 229(1)(b)
 - penalty for failure to provide, 162(6)
 - tax shelter investor, 237.1(7)(a)
 - use or communication of prohibited, 237(2)(b)
 - offence of, fine or imprisonment, 239(2.3)
- Social Sciences and Humanities Research Council**
 - payments to, as R&D expenditures, 37(1)(a)(ii)(E), 37(7)“approved”
 - research grants, taxable, 56(1)(o)
- Social security**
 - benefits, Canada-U.S. Tax Treaty:Art. XVIII:5
 - legislation
 - pension plan under, excluded from RCA, Reg. 6802(g)
 - social security taxes
 - paid to U.S., Canada-U.S. Tax Treaty:Art. XXIV:2(a)(ii)
- Social Security Tribunal**
 - costs of appeal to
 - deductible, 60(o)(ii)
 - reimbursement of, taxable, 56(1)(l)(ii)
- Société internationale de télécommunications aéronautiques**
 - employment income of non-Canadians, deduction for, 110(1)(f)(iv)
- Societies**
 - exemption for, 149(1)(l), 149(2)
 - deemed a trust, 149(5)
- Soft costs**
 - construction, 18(3.1)–(3.7), 20(29)
- Software**, *see also* Computer software tax shelter property [repealed]
 - air navigation, withholding tax exemption on lease of, 212(1)(d)(xi)(D)
 - capital cost allowance
 - application software, Reg. Sch. II:Cl. 12(o)
 - “computer software” defined, Reg. 1104(2)
 - limitation where tax shelter, Reg. 1100(20.1)
 - system software, Reg. Sch. II:Cl. 10(f), Sch. II:Cl. 29
 - defined, Reg. 1104(2)
 - separate class, Reg. 1101(5p)
 - development by financial institution, no R&D credits, 248(1)“scientific research and experimental development”
 - non-resident withholding tax, 212(1)(d)
 - royalties paid to U.S. resident, Canada-U.S. Tax Treaty:Art. XII:3(b)
 - sales suppression, *see* Zapper software (or hardware)
 - tax shelters
 - capital cost allowance limitation, Reg. 1100(20.1)
 - registration requirements, 237.1
 - voice recognition
 - disability supports deduction, 64(a)A(ii)(G)
 - medical expense credit, 118.2(2)(l.42)
 - zapper, *see* Zapper software (or hardware)
- Sojourning in Canada**
 - 183 days, deemed resident, 250(1)(a)
- Solar heating equipment**
 - capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(i), Sch. II:Cl. 43.2(b)
- Solar panels**, 9(1) (Notes)
- Soldiers**, *see* Canadian Forces and veterans
- Sole proprietorship**, *see* Proprietorship
- Sole-purpose R&D performer**
 - ITCs allowed for administrative costs, Reg. 2902(a) [closing words, repealed]
- Solicitor-client privilege**
 - defence, 232(2)
 - defined, 232(1)
 - for reportable-transaction rules, 237.3(1)
 - definitions, 232(1)
 - protection from notifiable-transaction rules, 237.4(15)
 - protection from reportable-transaction rules, 237.3(17)
 - rules governing, 232

- Solicitor-client privilege (*cont'd*)
- waiver of, 232(14)
- Solid biofuel**
- defined, Reg. 1104(13)
- Solidarily liable**, *see* Liability for tax: joint and several
- Solution gas**
- CCA application, Reg. Sch. II:Cl. 43.1(c)(i)(B)
 - defined, Reg. 1104(13)
- Solway case overruled**, 244(13.1) [repealed]
- Sommerer case overruled**, 94(8.1), (8.2)
- Son-in-law, as child of the taxpayer**, 252(1)(c)
- Source**
- business or property, income or loss, 9–37
 - capital gains and losses, 38–55
 - deductions applicable to, 4(2), (3)
 - employment income, 5–8
 - income from, 4(1)
 - other sources of income, 56–59.1
 - withholding of tax at, 153(1)
 - non-residents, 215
- Source deductions**, *see* Withholding
- Source individual**
- defined, for income-splitting tax, 120.4(1)
- Source withholding**, *see* Withholding
- South Africa**, *see also* Foreign government
- stock exchange recognized, 262
 - universities, gifts to, Reg. Sch. VIII, s. 19
- Spacecraft, telecommunication**, *see* Telecommunication spacecraft
- Spain**, *see also* Foreign government
- stock exchange recognized, Reg. 3201(1)
 - universities, gifts to, Reg. Sch. VIII, s. 13
- Speaking aid, as medical expense**, 118.2(2)(i)
- Special Access Programme**
- drugs, medical expense credit, 118.2(2)(s)
 - medical devices, medical expense credit, 118.2(2)(t)
- Special foreign tax credit**
- allowed for minimum tax purposes, 127.5(a)(ii)
 - carryforward to other years, 120.2(3)(c)(i)
 - defined, 127.54(2)
- Special-purpose building, defined**, Reg. 2903
- Special purpose loss corporation**
- defined, for interest deduction restrictions, 18.2(1)
- Special refundable tax**
- under Part IID of former Act, ITAR 67
- Special work site, employment at**, (6(6))
- Specific provisions**
- defined, Reg. 8006
- Specified active business**
- defined
 - for labour-sponsored venture capital corporations, 204.8(1)
- Specified active member**
- defined, Reg. 8306(4)(b)
- Specified adjustment factor**
- defined, FAPI rules, Reg. 5902(2)(b)
- Specified affiliate**
- for stock buyback tax
 - acquisition of equity, may trigger tax, 183.3(5)
 - defined, 183.3(1)
- Specified amount**
- defined
 - re disposition of foreign resource properties, 66.7(13.2)
 - re disposition of resource properties, 66.7(12.1)
 - re flow-through share renunciations, 66(20)
 - re indexing to inflation, 117.1(2)
 - re loan from foreign affiliate, 90(15)
 - re royalty reimbursements, 80.2(1)(a)
 - re seizure of property by creditor, 79(1), 79.1(1)
- Specified animal**
- valuation of, 28(1.2)
- Specified beneficiary**
- re foreign reporting requirements
 - defined, 233.2(1)
 - re principal residence
 - defined, 54“principal residence”(c.1)(ii)
 - re retirement compensation arrangement (RCA)
 - defined, 207.5(1)
 - re thin capitalization
 - defined, 18(5)
- Specified Canadian entity**
- defined, 233.3(1)
 - reporting re distribution from foreign trust, 233.6(1)
 - reporting re foreign property, 233.3(3)
- Specified Canadian risk**
- defined
 - for FAPI insurance rules, 95(2)(a.3)
 - for insurer’s foreign branch, 95(2)(a.3), 138(12)
- Specified child care start-up expenditure**
- defined, 127(9)
- Specified class**
- defined
 - associated-corporation rules, 256(1.1)
 - capital gains strips, 55(1)
 - wind-up of corporation, 88(1)(c.8)
 - effect on corporations being associated, 256(1), (1.6)
 - redemption of, 55(1)“permitted redemption”
- Specified cooperative corporation**
- defined, Reg. 4901(2)
- Specified cooperative income (repealed)**
- defined, 125(7)
 - small business deduction for, 125(7)“specified corporate income”(a)(i)
- Specified corporate income**
- defined, for small business deduction, 125(7)
 - excluded from eligibility for small business deduction, 125(1)(a)(ii.1)
- Specified corporation**
- defined
 - re butterfly reorganization, 55(1)
 - re FAPI stub-period election, 91(1.4)(c)
 - re gold and silver investments by RRSPs, etc., Reg. 4900(1)(t)(iv)
- Specified cost**
- debt forgiveness rules
 - application of, 79.1(6), (7)
 - defined, 80.01(1)
 - seizure of property by creditor
 - cost of seized property includes, 79.1(6)
 - defined, 79.1(1)
- Specified counterparty**
- defined, for synthetic equity arrangement rules, 112(2.32)(b)(ii)(A)(I)
- Specified date**
- defined, for rule on dispositions subject to warranty, 42(2)
- Specified debt obligation**, *see also* Lending asset; Mark-to-market property
- accrued return from, Reg. 9102(1), (3)
 - amalgamation of holder, 87(2)(e.3)
 - amortization date, Reg. 9200(2)
 - cost amount of, 248(1)“cost amount”(d.2)
 - credit-related gains and losses, 142.4(7)

Index

- Specified debt obligation** (*cont'd*)
- defined, 142.2(1), Reg. 9100, 9200(1)
 - disposition of, 142.4, Reg. 9200–9204
 - no capital gain, 39(1)(a)(ii.2)
 - no capital loss, 39(1)(b)(ii)
 - payment received after disposition, 142.4(11)
 - early repayment of, 142.4(10)
 - foreign exchange adjustment, Reg. 9104
 - income inclusion and deduction prescribed, 142.3(1)
 - mark-to-market property, 142.5(3)
 - partial disposition of, 142.4(9)
 - payment received after disposition, 142.4(11)
 - prescribed obligations, Reg. 9202
 - primary currency of, defined, Reg. 9100
 - rollover of, 85(1.1)(g.1)
 - superficial loss rule not applicable, 142.6(7)
 - transfer of insurance business by non-resident holder, 138(11.5)(k.1)
 - wind-up of holder into parent, 88(1)(a.3)
- Specified debtor**
- defined, re loan from foreign affiliate, 90(15)
- Specified deposit**
- defined, 95(2.5)
 - excluded from FAPI, 95(2)(a.3)
- Specified development phase (of oil sands project)**
- defined, Reg. 1104(2)
- Specified disability savings plan**
- plan becoming, 146.4(1.1)
 - plan ceasing to be, 146.4(1.2), (1.3)
 - withdrawals permitted, 146.4(1)“specified year”(a), 146.4(4)(n)(i)
- Specified disabled person**
- defined, for Home Buyers' Plan, 146.01(1)
 - loan from RRSP to acquire home for, 146.01(1)“supplemental eligible amount”
- Specified discontinuance**
- Specified distribution**
- for registered pension plan
 - defined, Reg. 8304.1(8)
 - for TFSA
 - defined, 207.01(1)
 - does not increase unused contribution room, 207.01(1)“unused TFSA contribution room”(b)B(ii)
 - does not reduce excess TFSA amount, 207.01(1)“excess TFSA amount”C(b), E(a)
- Specified educational program**
- defined, 118.6(1), 146.1(1)
- Specified eligibility day**
- defined, for phased retirement rules, Reg. 8503(16)
- Specified employee**
- defined, 248(1)
 - of partnership, 15(2.7)
 - remuneration of
 - calculation of prescribed proxy amount for R&D investment tax credit, Reg. 2900(7), (8)
 - excluded from R&D expenditure pool, 37(8)
 - limitation on SR&ED deduction, 37(9.1)
- Specified energy property**
- defined, Reg. 1100(25), (27)–(29)
 - limitation on capital cost allowance, Reg. 1100(24)
 - separate class, Reg. 1101(5m)
- Specified entity**
- defined, for hybrid mismatch arrangement rules, 18.4(1), 18.4(17)
- Specified event**
- defined, re stock option deduction, 110(1.6)
- Specified expense (re flow-through shares)**
- defined, 66(12.6), (12.601)
- Specified farming or fishing income**
- allowed for small business deduction, 125(7)“specified corporate income”(a)(i)
 - defined, 125(7)
- Specified fixed interest**
- defined, for FAPI rules, 95(1)
- Specified foreign exploration and development expense**
- country-by-country allocation, 66(4.1), (4.2)
 - successor corporation, 66.7(2.1), (2.2)
 - defined, 66(15)
- Specified foreign property**
- defined, 233.3(1)
 - over \$100,000, reporting requirement, 233.3(1)“reporting entity”
- Specified future tax consequence**
- defined, 248(1)
 - ignored for balance-due day of corporation, 248(1)“balance-due day”(d)(i)(C)
 - ignored for instalment threshold
 - corporation, 157(2.1)(a), 161(4.1)(a)
 - farmers and fishermen, 161(4)(a)
 - individuals, 156.1(1.1), (1.2), 161(4.01)(a)
 - ignored for investment tax credit of small corporation, 127(10.2)A
 - ignored for penalties, 162(11)
 - ignored for refundable investment tax credit, 127.1(2)“qualifying corporation”
- Specified gain**
- defined, 93(2.02), (2.12), (2.22), (2.32)
- Specified gift [repealed]**
- registered charity, of
 - defined, 149.1(1)
 - excluded from charitable expenditures and qualified gifts, 149.1(1.1)
- Specified hedging transaction**
- deemed to be dividend rental arrangement, 248(1)“dividend rental arrangement”(b.1)
 - intercorporate dividend deduction denied, 112(2.3)
 - securities dealer allowed full deduction, 260(6.2)
 - defined, 248(1)
- Specified holding corporation**
- defined, Reg. 5100(1)
- Specified individual**
- for income-splitting tax
 - defined, 120.4(1), 248(1)
 - tax on, 120.4(2)
 - for LSVCCs
 - defined, 204.8(1)
 - ownership and transfer of labour-sponsored venture capital corporation shares, 204.81(1)(c)(v)–(vii)
 - for pension regulations
 - defined, Reg. 8515(4)
- Specified insurance benefit**
- defined, for insurance demutualization, 139.1(1)
- Specified interest amount**
- defined, for shareholder loans, 80.4(7)
- Specified interest expense**
- defined, for alternative interest-deduction restrictions, 18.21(1), (4)
- Specified interest income**
- defined, for alternative interest-deduction restrictions, 18.21(1), (4)
- Specified investment business, *see also* Investment business**
- defined, 125(7), 248(1)
 - excluded from active business income, 125(7)“active business carried on by a corporation”

- Specified investment business** (*cont'd*)
- included in base for dividend refund, 129(4)“income” or “loss”(a)
 - included in property income, 129(4)“aggregate investment income”(b)
- Specified investment flow-through**
- distributions tax on income trusts and partnerships, *see* SIFT trust; SIFT partnership
- Specified investment flow-through partnership**, *see* SIFT partnership
- Specified investment flow-through trust**, *see* SIFT trust
- Specified jurisdiction**
- defined, 93.3(1)(b)
- Specified leasing property**
- acquired in the year, Reg. 1100(2)C:F(b)(iii)
 - addition or alteration to, Reg. 1100(1.19)
 - amount deductible in respect of, Reg. 1100(1.1)
 - defined, Reg. 1100(1.11)
 - separate class, Reg. 1101(5n)
- Specified licensee**
- defined, for non-resident withholding tax back-to-back rules, 212(3.8)
- Specified loan**
- defined, Reg. 8006
- Specified maximum amount**
- defined, for RDSP, 146.4(1)
- Specified member (of partnership)**, *see also* Limited partner
- anti-avoidance rule
 - re alternative minimum tax, 127.52(2.1)
 - re negative ACB triggering gain, 40(3.131)
 - CNIL of, 110.6(1)“investment expense”, “investment income”
 - deemed capital gain on negative adjusted cost base, 40(3.1)(a)
 - defined, 248(1), (28)
 - FAPI rules, 95(1)“investment business”
 - investment tax credit of, 127(8)(b)
 - minimum tax, 127.52(1)(c.1)
 - R&D losses of, no deduction, 96(1)(g)
 - real property of (capital gains exemption), 110.6(1)“non-qualifying real property”
 - where interest in partnership loaned or transferred, 96(1.8)
- Specified minimum tax regime**
- defined, for hybrid mismatch arrangement rules, 18.4(1)
- Specified Minister**
- defined, for RDSPs, 146.4(1)
- Specified multi-employer plan**, *see also* Registered pension plan
- defined, Reg. 8510(2), (3)
- Specified mutual fund trust**
- defined, for synthetic equity arrangement rules, 248(1)
- Specified non-member**
- defined, for alternative interest-deduction restrictions, 18.21(1), (6)
- Specified non-qualified investment income (of registered plan)**
- CRA may notify that distribution required within 90 days, 207.06(4)
 - benefit attributable to SNQII is advantage if not distributed after notice, 207.01(1)“advantage”(b)(iv)
 - defined, 207.01(1)
- Specified non-resident beneficiary**
- defined, for thin capitalization rules, 18(5)
- Specified non-resident shareholder**
- defined, 18(5)
 - loans by, thin capitalization rules, 18(4)–(6)
- Specified obligation (re debt forgiveness rules)**
- defined, 80.01(6)
 - parking of, deemed settled, 80.01(7), (8)
- Specified oil sands property**
- defined, Reg. 1104(2)
- Specified oil sands mine development expense**
- defined, 66.1(6)
 - excluded from EOSMDE, 66.1(6)“eligible oil sands mine development expense”^A
 - included in CEE, 66.1(6)“Canadian exploration expense”(g.2)(i)
- Specified oil sands mine development project**, *see also* Specified oil sands mine development expense
- completion of defined, 66.1(6)“completion”
 - defined, 66.1(6)
- Specified owner**
- defined, for artificial foreign tax credit generator rules, 91(4.2), Reg. 5907(1.04)
- Specified participating interest**
- defined, 248(1)
- Specified participating percentage**
- defined, for interest deduction restrictions, 18.2(1)
- Specified partnership business limit**
- assignment of, 125(8)
 - defined, for small business deduction, 125(7)
- Specified partnership income**
- defined, 125(6), (6.2), 125(7)“specified partnership income”
 - small business deduction for, 125(1)(a)(ii)
- Specified partnership loss**
- defined, 125(7)
 - reduces small business deduction, 125(1)(a)(iv)
- Specified party**
- defined, for non-resident trust rules, 94(1)
- Specified pension plan**
- defined, 248(1), Reg. 7800
 - treated as RRSP for certain purposes, 146(21)–(21.3)
- Specified percentage**
- COVID-19 Canada Emergency Wage Subsidy
 - defined, 125.7(1)
 - Canadian oil and gas exploration expense, re, Reg. 1206(1)
 - carbon capture, utilization and storage
 - defined, 127.44(1)
 - corporation, in respect of partnership
 - defined, 34.2(1)
 - credit for northern residents
 - application in calculation of credit, 110.7(1)(a), (b)(ii)
 - defined, 110.7(2)
 - impaired debts reserve
 - defined, 20(2.4)
 - investment tax credit, 127(9)
 - application in calculation of credit, 127(9)“investment tax credit”(a), (a.3), (e.1)
 - defined, 127(9)“specified percentage”
 - long-haul truck driver meals
 - allowed for consumption by driver, 67.1(1.1)
 - defined, 67.1(5)
 - manufacturing and processing credit — resource income
 - application in calculation of credit, Reg. 5203(3)(d)
 - defined, Reg. 5202
 - trust distribution
 - defined, 107(2)(b.1)
- Specified period**
- defined, for insurance demutualization, holding corporation, 141(4)
- Specified person**
- defined
 - for attribution rules, 74.5(8)
 - for dividend deductibility on guaranteed share, 112(2.22)(b)
 - for First-Time Home Buyer’s Credit, 118.05(1)
 - for flow-through shares, Reg. 6202.1(5)

Index

Specified person (*cont'd*)

- for prescribed security for non-resident withholding tax, Reg. 6208(3)
- for prescribed share for capital gains exemption, Reg. 6205(5)
- for prescribed shares under stock option rules, Reg. 6204(3)
- for source withholdings, 227(5.1)
- for stock option limit rules, 110(0.1)
- for wind-up of corporation, 88(1)(c.2)

Specified person or partnership

- defined, 95(1)

Specified personal corporation, defined, ITAR 57(11)

Specified place

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

Specified plan

- defined, 146.1(1)

Specified portion

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

Specified predecessor corporation

- defined, 95(1)

Specified predecessor, defined, 59(3.4)

Specified property

- adjustment to adjusted cost base, 53(2)(g.1), 53(4)–(6)
- child care space investment tax credit
 - defined, 127(9)
 - excluded, 127(9)“eligible child care space expenditure”(b)(i)
- debt forgiveness rules
 - defined, 54
 - gain on disposition of, 80.03
 - option in respect of, when exercised, 49(3.01)
- FAPI of banks
 - defined, 95(2.32)
 - excluded from FAPI rule, 95(2.31)
- resource allowance
 - defined, Reg. 1206(1)
- wind-up of corporation
 - defined, 88(1)(c.4)
 - whether subject to bump in cost based on wind-up, 88(1)(c.3)(i), (v)

Specified proportion

- for thin capitalization rules, defined, 18(5)
- of partner, defined, 248(1)

Specified provision

- defined, for attribute trading restrictions on change in control, 256.1(1)
- defined, for FAPI partnership rule where shares owned by partnership, 93.1(1.1)

Specified publicly offered debt obligation

- defined, 212(23)

Specified purchaser

- defined, for FAPI rules, 95(1)

Specified purpose

- defined
 - for Australian trust rules, 93.3(4)
 - for Canadian exploration expenses, 66.1(6)

Specified RDSP payment

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

Specified reserve adjustment

- defined, 20(30)
- impaired debt reserve calculation, 20(1)(l)(ii)(D)(II)N

Specified retirement arrangement

- defined, Reg. 8308.3(1)
- PSPA of, Reg. 8308.3(4)
 - information return, Reg. 8402(3)
- pension credit under, Reg. 8308.3(2), (3)

Specified right

- defined
 - for back-to-back shareholder loan rules, 15(2.192)
 - for non-resident withholding tax back-to-back rules, 212(3.8)
 - for thin capitalization rules, 18(5)
 - for trust loss trading rules, 251.2(1)
 - for 1972 transitional rules for goodwill, ITAR 21(3)

Specified royalty

- defined, Reg. 1206(1)

Specified royalty arrangement

- defined, for non-resident withholding tax back-to-back rules, 212(3.8), (3.94)

Specified sampling

- defined, 127(9)
- eligible for flow-through mining credits, 127(9)“flow-through critical mineral mining expenditure”(b)(ii), 127(9)“flow-through mining expenditure”(b)(ii)

Specified section 93 election

- defined, 92(1.3)
- effect of, 92(1.2), (1.4)

Specified securities lending arrangement

- defined, 260(1)

Specified share

- defined
 - for non-resident trust rules, 94(1)
 - for non-resident withholding tax back-to-back rules, 212(3.8)

Specified shareholder

- defined, 18(5), 18(5.1), 55(3.2)(a), 88(1)(c.2)(iii), 248(1)
- extension of definition to trusts and partnerships, *see* Specified unitholder
- interest on debt relating to the acquisition of land, 18(3)“interest on debt relating to the acquisition of land”(b)
- non-resident, loans by, thin capitalization rules, 18(4)
- soft costs relating to construction, 18(3.1)(b), 18(3.2)(b)

Specified small business corporation

- defined, for RRSP etc. qualified investments, Reg. 4901(2)

Specified subsidiary corporation

- acquisition of share by, 88(1)(c.4)(i)
- defined, 88(1)(c.5)

Specified synthetic equity arrangement, *see also* Synthetic equity arrangement

- defined, 248(1)

Specified taxation year

- defined, 95(2)(j.1), 95(2)(k), Reg. 5907(2.9)

Specified taxpayer

- defined, for look-through rule for certain trusts, 259(5)

Specified temporary access road

- defined, Reg. 1104(2)

Specified tenant

- defined, 125.7(1)“public health restriction”(e)

Specified time

- defined
 - for new employers remitting quarterly, Reg. 108(1.41)
 - for non-resident trust rules, 94(1)

Specified transaction or event

- defined, 211(1)

Specified trust

- defined
 - for Australian and Indian trusts, 93.3(1)
 - for prescribed annuity contracts, Reg. 304(1)(c)(iii)(A)

Specified unitholder

- defined, 248(1)

Specified value

- defined, for stock option deferral rules, 7(11)

Specified waste material

- defined, Reg. 1104(13)

Specified wholly-owned corporation

- defined, 55(1)

Specified year

- defined
- for employee life and health trust carryforward, 111(7.5)
- for registered disability savings plan, 146.4(1)
- for registered pension plan maximum lifetime retirement benefits, Reg. 8504(1)(a)

Speech impairment

- Bliss symbol board for, disability supports deduction, 64(a)A(ii)(N)
- certification of
- for disability credit, 118.3(1)(a.2)(ii)
- sign language interpretation services for, *see* Sign language: interpretation service

Speech-language pathologist

- certification of speech impairment
- for disability credit, 118.3(1)(a.2)(ii)
- defined, 118.4(2)

Speech recognition software, *see* Voice recognition software**Speech synthesizer for mute person**

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

Speech therapy

- medical expense credit, 118.2(2)(1.3), (1.9)

Spent pulping liquor

- cogeneration system using, Reg. Sch. II:Cl. 43.1(c)(i)(A)
- defined, Reg. 1104(13)

Sperm

- cost of, medical expense credit, 118.2(2)(v)

Spinal brace, as medical expense, 118.2(2)(i)**Spinoff**, *see* Foreign spin-off**Spire Freezers case overruled**, 96(8)**Split income**, 120.4

- attribution rules do not apply, 56(5), 74.4(2)(g), 74.5(13)
- deduction from regular income, 20(1)(ww)
- defined, 120.4(1), 248(1)
- tax on children, 120.4(2)
- minimum tax carryover not allowed, 120.2(1), 120.2(1)(b)(i)
- parent jointly liable with child, 160(1.2)

Split-pension amount

- deduction to pensioner, 60(c)
- defined, 60.03(1)
- included in pension transferee's income, 56(1)(a.2)
- joint liability for tax, 160(1.3)

Split-receipting

- charitable gifts or political contributions, 248(30)–(33)

Splitting, sharing or apportionment

- adoption expense credit, 118.01(3)
- charitable donation super credit for first-time donors, 118.1(3.2)
- charitable donations, 118.1(1)“total charitable gifts”(c)(i)(A)
- child tax credit, where custody divided, 118(5.1)
- digital news subscription credit, 118.02(3)
- disability credit, 118.3(3)
- equivalent-to-spouse credit, where custody divided, 118(5.1)
- first-time home buyer's credit, 118.05(4)
- home accessibility tax credit, 118.04(5)
- income, *see* Income splitting
- medical expenses, 118.2(1)B
- pension income, 60.03

Sport centres or sport clubs relief (COVID), Reg.

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

Sports event, *see also* Amateur athlete trust; Athlete

- ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(iv)
- ineligible for film/video production services credit, Reg. 9300(2)(d)

Sports participation credit, *see* Children's Fitness Credit (pre-2017)**Sports program**

- youth boarding allowance non-taxable, 6(1)(b)(v.1)

Spousal bridging benefits

- for registered pension plan, Reg. 8503(2)(1.1)

Spousal education upgrade benefit

- paid to Canadian Forces member or veteran, exempt, 81(1)(d.1)(vii)(G)

Spousal equivalent credit, 118(1)B(b)**Spousal or common-law partner plan**

- defined, 146(1)

Spousal support, *see* Support payments (spousal or child)**Spousal trust**, *see also* Trust (or estate): spouse

- pre-1972
- deemed disposition by, 104(4)(a.1)
- defined, 108(1)

Spouse, *see also* Common-law partner

- alimony, *see* Support payments (spousal or child)
- common-law deemed spouse, *see* Common-law partner
- death
- claim under provincial family law deemed to be transfer on death, 248(23.1)
- rollover of property, 70(6)
- deemed benefits under plans, 146(8.91)
- defined, 252(3), (4)
- re prescribed annuity contracts, Reg. 304(5)
- dividends received by, election re, 82(3)
- divorce, *see* Divorce and separation
- former
- defined, 252(3)
- transfer of property to, 73(1)
- income from property transferred to
- joint liability for tax, 160(1)–(3)
- income splitting through RRSP transfers, 146(8.3), 146.3(5.1)–(5.5)
- joint and several liability for tax, 160
- living apart
- commutation of RRSP, 146(8.3)
- property transferred
- liability for tax on income or gain from, 160(4)
- transfer to, 74.5(3)
- loans to, 74.1(1)
- for value, 74.5
- gain or loss, 74.2
- repayment of, 74.1(3)
- maintenance, *see* Support payments (spousal or child)
- marriage breakdown, *see* Divorce and separation
- notch provision, 117(7), 118.2(1)D
- pension payments to widow(er) of contributor, 57(5)
- principal residence transferred to, 40(4)
- private health services plan premiums, medical expenses, 118.2(2)(q)
- property acquired from deceased taxpayer, 70(6)
- property in trust for, deemed disposition by trust, 104(4)(a)
- deemed proceeds and cost, 104(5)
- property transferred between
- valuation rules, 73
- where transferee non-resident, Part XIII tax not exigible, 212(12)
- registered retirement savings plan for
- amount of premiums deductible, 146(5.1)
- meaning, 146(1)“spousal or common-law partner plan”

Index

Spouse (*cont'd*)

- premiums not subject to income attribution rules, 74.5(12)
- transfers to
 - income splitting via, 146(8.3), 146.3(5.1)–(5.5)
 - marriage breakdown, on, 146(16), 146.3(5.1), 147.3(5)
- reserves allowed to, for year of taxpayer's death, 72(2)
- rollover of property
 - death, on, 70(6)
 - generally, 70(6)
 - *inter vivos*, 73(1)
 - reserves for year of death, 72(2)
- separation, *see* Divorce and separation
- support of
 - when living together, 118(1)B(a)
 - when separated or divorced, *see* Support payments (spousal or child)
- surviving
 - as RRIF annuitant, 146.3(1)“annuitant”(b)
 - death benefit paid to, 248(1)“death benefit”
 - transfer of business to, 24(2)
 - transfer of property to, 74.1(1)
 - for fair market value, 74.5
 - gain or loss, 74.2, 74.5
 - RRSP on marriage breakdown, 146(16)(b)
 - repayment of, 74.1(3)
 - special rules, 160(4)
 - valuation rules, 73
- trust for, *see* Trust (or estate): spouse
- unused credits transferred to, 118.8

Sprinkler system installer

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

St. Lawrence Seaway Authority, subject to tax, 27(2), Reg. 7100

Stabilization account, *see* Net income stabilization account

Stable equipment

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

Stairs, power-operated climbing chair for, medical expense, Reg. 5700(f)

Stakeholder

- defined, for insurance demutualization, 139.1(1)

Standard & Poor 500 Depositary Receipts

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

Standard amount

- defined, for northern residents' deduction, 110.7(6)

Standby charge

- automobile, 6(1)(e)
- car salesperson/lessor, reasonable amount, 6(2.1)
- operating costs, optional one-half, 6(1)(k)A(iv)
- partner or employee of partner, 12(1)(y)
- reasonable amount, 6(2)
- shareholder, 15(5)
- available money, for
 - non-resident tax, 214(15)

Standing therapy

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

Stapled security (re SIFT)

- anti-avoidance rule, 12.6
- defined, 18.3(1)
- limitation on deduction, 18.3(3)
- temporary unstapling, 12.6

Start-up period

- defined, for LSVCCs, 204.8(1)

State

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

Stated capital, *see* Paid-up capital

Stated percentage

- defined, 59(3.4)
- for resource allowance, Reg. 1206(1)
- variation of, 59(3.5)

Statistics, *see* Communication of information: statistical purposes

Status Indian, *see* Indian

Statute-barred debt, deemed settled, 80.01(9)

- subsequent payment of debt, 80.01(10)

Statute-barred reassessments, 152(3.1), (4)

Statutory exemptions, 81(1)(a)

Stay of appeal during action to prosecute, 239(4)

Steam

- deemed to be goods for M&P credit, 125.1(5)
- processing of, investment tax credit, 127(9)“qualified property”(c.1)
- production of, manufacturing and processing credit, 125.1(2)

Steamfitter/pipefitter

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

Stepchild, dependent, 118(6)(a)

Stock, capital, *see* Capital stock; Share

Stock buyback tax, 183.3, 183.4

- rate of tax, 183.3(2)
- return required, 183.4

Stock dividend, *see* Dividend: stock

Stock exchange

- designated, *see* Designated stock exchange
- prescribed, grandfathered from before Dec. 14/07, Reg. 3200, 3201
- recognized, *see* Recognized stock exchange

Stock index participation trust

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

Stock option

- benefit from, 7(1)
- addition to adjusted cost base of share, 53(1)(j)
- Canadian-controlled private corporation (CCPC), 7(1.1)
- election where shares have dropped in value since exercise, 180.01 [repealed]
- emigration from Canada, no income inclusion, 7(1.6)
- offsetting 1/2 deduction, 110(1)(d), (d.1)
- withholding of tax at source, 153(1.01)
- cancellation of rights, deemed disposition, 7(1.7)
- cash-out, 7(1)(b.1), (d.1)
- death of employee, 7(1)(e), 164(6.1)
- deduction to employer, 110(1)(e)
- deferral, 7(8)–(16)
- information return, Reg. 200(5)
- donation of shares to charity, 110(1)(d.01)
- election by employer to forgo deduction for cash payment, 110(1.1), (1.2)
- no deduction to employer, 18(1)(m)
- emigration of employee, 7(1.6), 128.1(4)(d.1)
- employees, to, 7, 110(1)(d), (d.1)
- excluded from deemed disposition
 - on becoming non-resident, 128.1(10)“excluded right or interest”(c)
 - on becoming resident, 128.1(1)(b)(v)
- look-through rules, 7(2)
- non-qualified security, 110(1.31), (1.4), (1.41)
- excluded from deduction to employee, 110(1)(d)
- notification to employee, 110(1.9)
- prescribed shares, Reg. 6204
- reduction in exercise price, 110(1.7), (1.8)
- repricing of, 110(1.7), (1.8)
- return of employee shares by trustee, 8(12)
- rights ceasing to be exercisable, deemed disposition, 7(1.7)
- stock split or consolidation, effect of, 110(1.5)

Stock option (*cont'd*)

- United States interaction, Canada-U.S. Tax Treaty:Fifth Protocol (2007), Annex B, para. 6
- whether counted as SR&ED expenditure, 143.3(2)
- whether deductible to issuer, 143.3(2)

Stock purchase loan

- employee, to, 15(2.4)(c)

Stock rights

- issued to shareholder, 15(1)(c)

Stock savings plan, prescribed

- shares of
 - capital loss from disposition of, 40(2)(i)
 - prescribed assistance, deduction from cost base, 53(2)(k)(i)(C)

Stock split

- effect on stock option, rules, 110(1.5)

Stone quarry

- defined, Reg. 1104(8)

Stop International Tax Evasion Program, *see* Informant payments**Stop-loss rules**

- amalgamation, 87(2)(a), 87(2.1)
- change in control of corporation, 111(4)–(5.2)
- disposition by corporation of interest in trust, 107(1)(c)
- disposition by partner of interest in trust, 107(1)(d)
- disposition by partner of share on which dividends paid, 112(3.1)
- disposition of commercial obligation in exchange for another, 40(2)(e.2)
- disposition of debt owing by related person, 40(2)(e.1)
- disposition of partnership interest, 100(4)
- disposition of property
 - at less than FMV, 69(11)
 - to affiliated person, 40(3.3), (3.4)
 - to controller, 40(3.3), (3.4)
- disposition of share
 - held as inventory, 112(4)–(4.3)
 - in prescribed venture capital corporation or LSVCC, 40(2)(i)
 - of controlled corporation, 40(2)(h)
 - of corporation to itself, 40(3.6)
 - of foreign affiliate, 93(2)–(4)
 - on which dividend paid, 112(3)
 - received on reorganization, 112(7)
- dividend received by non-resident individual, 40(3.7)
 - credit where tax paid, 119
- exchanged shares, 112(7)
- foreign bank, on wind-up of affiliate, 142.7(13)
- losses following change of control of corporation, 111(4)–(5.2)
- mark-to-market property, 112(5.5), (5.6)
- non-resident individual, 40(3.7)
- post-emigration losses, 128.1(8)(f)
- pregnant losses, *see* Pregnant loss
- property transferred to trust, 107.4(3)(b)(ii)
- reverse takeover, 256(7)(c)–(c.2)
- shares held by financial institution, 112(5.2)
- wind-up of corporation, 88(1.1)

Stopping business, *see* Ceasing to carry on business; Winding-up**Storage area, capital cost allowance**, Reg. Sch. II:Cl. 1(g)

- for mine, Reg. Sch. II:Cl. 10(1)

Storage cost, underground

- capital cost allowance, Reg. Sch. II:Cl. 10(f.1), Sch. II:Cl. 41

Straddle transactions, 18(17)–(23)

- conditions for rules to apply, 18(18)
- deduction denied until offsetting position closed out, 18(19)
- different year-ends of taxpayer and connected person, effect of, 18(23)

Streamed income

- determination of, 66.7(2.3)(b)(ii)

Stretch credit

- for first-time charitable donor, 118.1(3.1), (3.2)

Strike pay

- not taxed (no legislative reference), *Fries* case [1990] 2 C.T.C. 439 (SCC)

Stripped bond

- cost of coupon excluded from income when sold, 12(9.1)
- interest taxable to holder, 12(1)(c)
 - annual accrual, 12(4), (9)
 - non-resident withholding tax on, 212(1)(b)(i)(B)

Stripping, *see* Capital gains stripping; Interest coupon stripping; Surplus stripping**Structured arrangement**

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

Structured settlement

- insurer's reserve for, Reg. 1400(3)E
- taxation of, 56(1)(d) (Notes), IT-365R2 para. 5

Structures G.B. Ltée case overruled, 67.1(2)(e.1)**Stub-period end time**

- defined, for FAPI, 91(1.2)(a), Reg. 5907(8.1)

Stub period FAPI, 91(1.1)–(1.5)

- “stub period” defined, Reg. 5907(8.1)

Student

- commuting to U.S.
 - tuition fees, credit, 118.5(1)(c)
- deemed resident, credit for tuition fees, 118.5(2)
- disabled
 - eligible for RESP withdrawals, 146.1(2)(g.1)(i)(B)
 - waiver of RESP age requirements, 146.1(2.2)
- loan, *see* Student loan
- moving expenses, 62(2)
- part-year resident, credit for tuition fees, 118.91
- taxpayer supporting, 118.9
- tuition fees
 - ancillary fees, 118.5(3)
 - in Canada, credit, 118.5(1)(a)
 - outside Canada, credit, 118.5(1)(b)
 - U.S. resident, Canada-U.S. Tax Treaty:Art. XX
 - unused credits, transfers of, 118.8, 118.9

Student loan

- forgiven, to doctor or nurse practising in remote region, no tax, Reg. 7300(c)
- interest paid on, tax credit, 118.62

Stursberg case confirmed, 40(3.13)**Subcontractors**

- construction, information return, Reg. 238

Subdivision of property, *see* Partition of property**Subject corporation**

- for associated corporations simultaneous-control rule, defined, 256(6.1)(b)
- for computation of contributed surplus, defined, 84(11)
- for foreign affiliate dumping rules
 - defined, 212.3(1)
 - investment in, defined, 212.3(10)
- for non-arm's length sale of shares by non-resident corporation, defined, 212.1(1)
- for non-arm's length sale of shares by resident corporation, defined, 84.1(1)
- for Part IV refundable tax on intercorporate dividends
 - defined, 186(3)
 - tax on dividend received from, 186(1)(b)
- for private foundation penalty on holding corporate shares, defined, 188.1(3.3)(c)

Subject entity

- defined, for SIFT trust and partnership distributions, 122.1(1)

Subject subsidiary corporation

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

Subleases, see Leasing properties**Subordinate**

- defined, for third-party penalty, 163.2(1)

Subordinate affiliate

- defined, for FAPI surplus rules, Reg. 5905(7.2)(c)

Subscriber

- defined, for RESPs, 146.1(1)

Subscriber's gross cumulative excess

- defined, for RESPs, 204.9(1)

Subscriber's share of the excess amount

- defined, for RESPs, 204.9(1)

Subsidiary, see also Parent (corporation)

- controlled corporation
 - defined, 248(1)“subsidiary wholly-owned corporation”
 - non-resident, *see also* Foreign affiliate
 - loan to, 17(3), 247(7)
- cost of shares of, 52(7)
- defined, 88(1), Reg. 8605(4)
- for trust loss trading rules, 251.2(1)
- foreign, *see* Foreign affiliate; Controlled foreign affiliate
- 90% or more owned, winding-up of
- net capital losses, 88(1.2), (1.3)
- non-capital losses, 88(1.1)
- parent corporation continuation of, 88(1.5)
- qualified expenditure, 88(1.4)
- rules, 88(1)
- wholly-owned corporation, *see also* Control of corporation
- amalgamation, on, 87(1.2), (1.4)
- defined, 248(1)

Subsidiary trust

- deemed settlement on SIFT trust wind-up, 80.01(5.1)

Subsidy

- housing, provided by employer, 6(23)

Substantial contribution of capital to partnership

- meaning of, 40(3.16)

Substantial increase in indebtedness

- meaning of, re partnership interest, 40(3.16)

Substantial interest

- defined, for Part VI.1 tax, 191(2), (3)

Substantially all

- meaning of, 66.6 (Notes)

Substantive CCPC

- capital dividend account addition, 89(1)“capital dividend account”(h)
- defined, 248(1), 248(43)
- eligible portion of taxable capital gains for dividend refund, 129(4)“eligible portion”
- full rate taxable income of, 123.4(1)“full rate taxable income”(b)
- GRIP inclusion, 89(1)“general rate income pool”E(b)
- LRIP inclusion, 89(1)“low rate income pool”D(a)
- NERDTH of, 129(4)“non-eligible refundable dividend tax on hand”(a)
- refundable tax payable by, 123.3
- relevant tax factor of, 95(1)“relevant tax factor”(b)

Substantive debt

- defined, for stock buyback tax, 183.3(1)

Substantive gift

- selling property and donating proceeds, anti-avoidance rule, 248(39)

Substitute payment arrangement

- defined, for hybrid mismatch arrangement rules, 18.4(14)
- effect of, 18.4(15)

Substitute payment mismatch

- defined, 18.4(15)(a)

Substitute's salary paid by employee

- deduction, 8(1)(i)(ii)
- certificate of employer, 8(10)

Substituted property

- defined, 248(5)
- for matchable expenditure rules, 18.1(8)(b)
- for superficial loss definition, 54“superficial loss”(a)
- for wind-up of corporation, 88(1)(c.3)

Substitution (Quebec)

- deemed to be trust, 248(3)

Subway, capital cost allowance, Reg. Sch. II:Cl. 1(j)**Succession duties**

- applicable to certain property, deduction for, 60(m.1)
- interest on, deductible, 60(d)

Successor beneficiary

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

Successor corporation

- Canadian resource property acquired from predecessor, 66.7(9)
- cumulative Canadian development expense, deduction for, 66.7(4)
- cumulative Canadian oil and gas property expense, deduction for, 66.7(5)
- defined, 59(3.4)
- mining exploration depletion, Reg. 1203(3)
- resource and processing allowances, Reg. 1202(3)
- resource expenses, rules re, 66.7
- application of, 66.6
- exclusions from, 66.7(6)
- resource property acquired from predecessor, 66.1(10)
- resource property acquired from tax-exempt person, 66.6(1), (2)
- second
 - resource and processing allowances, Reg. 1202(3)

Successor member

- defined, for pooled registered pension plan, 147.5(1)

Successor pool (re debt forgiveness rules)

- defined, 80(1)
- use of to limit reductions of resource expenditures, 80(8)(a)

Successor position

- defined, for straddle-transaction rules, 18(17)

Sulphur, see also Canadian field processing

- production of, Reg. 1206(1)“resource activity”(a)
- transporting, transmitting or processing, Reg. 1204(3)(a), 1206(1)“resource activity”(j)(i)(A)

Sunday, see Holiday**Super-allowance benefit amount**

- addition to investment tax credit, 127(10.1)(b)
- no direct ITC, 127(9)“investment tax credit”(a.1)
- defined, 127(9)

Super credit

- for first-time charitable donor, 118.1(3.1), (3.2)

Superannuation benefits, see also Pension

- defined, 248(1)
- estate receiving, 104(27)
- succession duties on, deduction for, 60(m.1)
- transferred to another plan, deductible, 60(j)
- unpaid, 78(4)

Superficial loss, see also Pregnant loss

- added to adjusted cost base of property, 53(1)(f)
- capital loss deemed nil, 40(2)(g)(i)
- capital property, 40(3.3)–(3.5), 54“superficial loss”
- defined, for capital gains purposes, 54
- financial institution, of, 18(13)–(15)
- no application to specified debt obligations or mark-to-market property, 142.6(7)

- Superficial loss (*cont'd*)
- inventory held as adventure in nature of trade, 18(14)–(16)
- Superior court**
- defined, *Interpretation Act* 35(1)
- Supplemental eligible amount**
- defined, for Home Buyers' Plan, 146.01(1)
- Supplemental employee retirement plan**, 248(1)“salary deferral arrangement” (Notes)
- Supplemental Pension Plans Act**, *see* Quebec: *Supplemental Pension Plans Act*
- Supplementary depletion base**
- capital cost of bituminous sands equipment added to
 - proceeds of later disposition, 59(3.3)(c)
 - capital cost of enhanced recovery equipment added to
 - proceeds of later disposition, 59(3.3)(d)
 - defined, Reg. 1212(3)
- Supplementary unemployment benefit plans**, 145
- amounts received under, income, 56(1)(g)
 - benefits
 - withholding tax, 153(1)(e)
 - defined, 145(1)
 - election to file return, 217
 - employer's contribution
 - limitation on deductibility, 18(1)(i)
 - not includable in employee's income, 6(1)(a)(i)
 - payments to non-resident, 212(1)(k)
- Supplies**
- deemed to be inventory, 10(5)
 - paid for and used by employee, 8(1)(i)(iii)
 - certificate of employer, 8(10)
 - valuation of, 10(4)
- Support amount**, *see also* Child support amount
- defined, 56.1(4), 60.1(4)
 - payments before agreement or court order, 56.1(3), 60.1(3)
 - whether deductible, 60(b), 60.1
 - whether taxable, 56(1)(b), 56.1
- Support payments (farm)**
- information slips required, Reg. 234–236
- Support payments (spousal or child)**
- “allowance” defined, 56(12)
 - child support, agreement or order after April 1997
 - non-deductible, 60(b), 56.1(4)“commencement day”
 - non-taxable, 56(1)(b), 56.1(4)“commencement day”
 - deductible when paid, 60(b), (c)
 - enforcement of, *see Family Orders and Agreements Enforcement Assistance Act*
 - income when received, 56(1)(b), (c)
 - medical/educational payments, 56.1(2), 60.1(2)
 - mortgage payments, 56.1(2), 60.1(2)
 - no dependant credit for spouse or child when paid, 118(5)
 - paid to non-resident, 212(1)(f), 217
 - paid to third parties for benefit of spouse or children, 56.1, 60.1
 - paid to U.S. resident, Canada-U.S. Tax Treaty:Art. XVIII:6
 - reimbursement of, taxable, 56(1)(c.2)
 - repayment of, deductible, 60(c.2)
 - retroactive deductibility/taxability, 56.1(3), 60.1(3)
 - taxable, 56(1)(b), (c)
- Supporting person**
- for child care expenses, defined, 63(3)
 - liability for excess child tax credit refunded, 160.1(2)
 - unused education credits transferred to, 118.9
- Suppression election**
- for foreign affiliate liquidation and dissolution, 88(3.3)–(3.4)
- Supreme Theatres case overruled**, 125(7)“active business carried on by a corporation”
- Surcharge**, *see* Surtax
- Surface construction**
- capital cost, 13(7.5)(b), Reg. 1102(14.3)
- Surplus**
- budget, *see* Budget surplus
 - contributed
 - computation of, on transfer of insurance business, 138(11.9)
 - converted into paid-up capital, no dividend deemed, 84(1)(c.1)–(c.3)
 - defined (re pension plan), Reg. 8500(1), (1.1)
 - distribution of, by foreign affiliate, Reg. 5901
 - exempt, *see* Exempt surplus (of foreign affiliate)
 - funds derived, *see* Surplus funds derived from operations
 - hybrid, *see* Hybrid surplus (of foreign affiliate)
 - pre-acquisition, *see* Pre-acquisition surplus (of foreign affiliate)
 - stripping, *see* Surplus stripping
 - taxable, *see* Taxable surplus (of foreign affiliate)
- Surplus entitlement percentage**
- defined, 95(1), Reg. 5905(13)
 - reduction in, deemed year-end and FAPI, 91(1.1)–(1.5)
- Surplus funds derived from operations**
- defined, 138(12)
- Surplus stripping**
- conversion of dividend to exempt capital gain, 110.6(8)
 - non-resident former resident who will return to Canada, 128.1(6)(b), 128.1(7)(e)
 - publicly-traded corporation, by, 183.1
 - sale of shares by individual, 84.1
 - sale of shares by non-resident, 212.1, 212.2
- Surrender**
- of property to creditor, *see also* Seizure: property
 - defined, 79(2)
 - does not constitute payment, 79(6)
 - proceeds of disposition to debtor, 79(3)
 - subsequent payment by debtor, 79(4)
 - of share, partnership interest or trust interest
 - deemed capital gain, 80.03(2)
 - defined, 80.03(3)
- Surrogacy expenses**
- medical expense credit, 118.2(2.21)
- Surrogate parent entity**
- defined, for country-by-country reporting, 233.8(1)
- Surrogatum principle**, 9(1) Notes (“Damages”)
- Surtax**, *see also* Additional tax
- banks and life insurers, 123.6
 - corporation, 123.2 [repealed]
 - credit against Part I.3 tax, 181.1(4)–(7)
 - credit against Part VI tax, 190.1(3)–(6)
 - health promotion, 182, 183
 - individual, 180.1 [repealed]
 - tobacco manufacturers, 182, 183
- Survey, quadrennial, reserve for**, 12(1)(h), 20(1)(o), Reg. 3600
- Surveying costs**
- cost base of property, addition to, 53(1)(n)
- Surveyor**
- defined, for surveys under *Canada Shipping Act*, Reg. 3600(2)
- Survivance case overruled**, 256(9)
- Surviving spouse**
- as RRIF annuitant, 146.3(1)“annuitant”(b)
 - death benefit paid to, 248(1)“death benefit”
 - tobacco manufacturers, 182, 183
- Survivor**
- defined
 - for FHSA, 146.6(1)
 - for TFSA, 146.2(1)
 - payment, *see* Survivor payment
 - qualifying (PRPP), *see* Qualifying survivor

Index

- Survivor (*cont'd*)
- subject to FHSA overcontributions tax, 207.022
- Survivor payment**
- defined, 207.01(1)“exempt contribution”(b)
- Suspended losses**, *see* Suspension of losses
- Suspension of charity receipting privilege**, 188.2
- objection to suspension, 165(1), 189(8)
 - Tax Court application for postponement of suspension, 188.2(4)
- Suspension of losses**
- capital losses, 40(3.3)–(3.5)
 - depreciable property, 13(21.2)
 - inventory held as adventure in nature of trade, 18(14)–(16)
 - share or debt owned by financial institution, 18(13), (15)
 - terminal losses, 13(21.2)
- Svenska Cellulosa/Essity spinoff**, Reg. 5600(k)
- Swap agreement**
- deemed to be eligible derivative subject to mark-to-market election, 10.1(4)
 - excluded from inventory writedown, 10(15), 18(1)(x)
 - straddle transaction restrictions, 18(17)“position”(a)(vi), 18(9)
- Swap transaction (for RRSP, RRIF, TFSA, RESP or RDSP)**
- benefit attributable to, constitutes advantage, 207.01(1)“advantage”(b)(iii)
 - defined, 207.01(1)
- Sweden**, *see also* Foreign government
- stock exchange recognized, Reg. 3201(w)
- Swine**
- basic herd maintained since 1971, deduction, 29
- Switch fund**, *see* Mutual fund corporation: switch fund
- Switzerland**, *see also* Foreign government
- stock exchange recognized, Reg. 3201(m)
 - universities, gifts to, Reg. Sch. VIII, s. 6
- Sylvite**
- extraction of, 248(1)“mineral resource”(d)(ii)
- Synagogue**, *see also* Charity
- rabbi employed by, *see* Clergy
- Syndicate**
- interest in
 - expenses of selling, 20(1)(e)
- Synthetic disposition arrangement**
- deemed disposition and reacquisition of property, 80.6
 - defined, 248(1)
 - effect on dividend stop-loss rules, 112(8), (9)
 - effect on foreign tax credit, 126(4.5), (4.6)
- Synthetic disposition period**
- defined, 248(1)
- Synthetic equity arrangement**
- constitutes dividend rental arrangement, 248(1)“dividend rental arrangement”(c)
 - defined, 248(1)
 - no deduction for intercorporate dividend, 112(2.3)
- Synthetic equity arrangement chain**
- defined, 248(1)
 - effect of, 112(2.32)(d)
- Synthetic equity arrangement party**
- defined, 112(2.32)(a)
- Synthetic long position**
- defined, 248(1)“synthetic equity arrangement”(b)(i)(A)
- Synthetic short position**
- defined, 248(1)“synthetic equity arrangement”(b)(i)
- Synthetic speech system etc.**
- enabling blind person to use computer
 - disability supports deduction, 64(a)(ii)(C)
 - medical expense credit, Reg. 5700(o)
- Syria**, *see also* Foreign government
- Canadian Forces personnel and police serving in, no tax on income, 110(1)(f), Reg. 7500(e) [repealed]
- Systemic failure**
- defined, for country-by-country reporting, 233.8(1)
- Systems software**, *see also* Software
- defined, Reg. 1104(2)
- ## T
- T1 returns**, 150(1)(b), (d)
- T2 returns**, 150(1)(a)
- T3 returns**, 150(1)(c)
- T4 information return**
- filing deadline (Feb. 28), Reg. 205(1)
 - requirement for, Reg. 200(1)
- T4 slips**, Reg. 200(1), (3)
- sending to employees by email, Reg. 209(3), (5)
- T4A slips**, Reg. 200(2), 201
- T5 slips**, Reg. 201
- T661 SR&ED claim**, 37(11)
- T778 child care expenses claim**, 63(1)
- T1044: NPO information return**, 149(12)
- T1134 foreign affiliate reporting**, 233.4(4)
- T1135 foreign property reporting**, 233.3(3)
- T2200 declaration of conditions of employment**, 8(10)
- T3010 charity information return**, 149.1(14)
- T5013 partnership information return**, Reg. 229(1)
- T5018 contract reporting**, Reg. 238
- TCC**, *see* Tax Court of Canada; Taxable Canadian corporation
- TCP**, *see* Taxable Canadian property
- TCP gains balance**
- defined
 - for mutual fund corporation, 131(6)
 - for mutual fund trust, 132(4)
- TCP gains distribution**
- mutual fund corporation
 - deemed to be dividend to non-resident shareholder, 131(5.1), (5.2)
 - defined, 131(6)
 - mutual fund trust
 - deemed to be dividend to non-resident shareholder, 132(5.1), (5.2)
 - defined, 132(4)
- TDD device**, *see* Teletypewriter
- TFSA**, *see* Tax-Free Savings Account
- TFSA dollar limit**
- defined, 207.01(1)
 - contributions over, 207.01(1)“excess TFSA amount”(a)
- TIEA**, *see* Tax information exchange agreement
- TIN (Taxpayer Identification Number)**
- for Common Reporting Standard
 - defined, 270(1)
 - penalty for failure to provide to financial institution, 281(3)
 - requirement to obtain and provide to financial institution, 281(1)
 - for digital platform operator reporting rules
 - defined, 282(1)
 - must be kept confidential, 293(2)
 - reportable seller must provide to reporting platform operator, 293(1)
 - penalty for failure to provide, 293(3)
- TLOPA**, *see* Time Limits and Other Periods Act (COVID-19)
- TOSI (Tax On Split Income)**, *see* Income-splitting tax
- TPAR**, *see* Total pension adjustment reversal
- TPS**, *see* Taxable preferred share

Index

- TRRP**, *see* Top-up revenue reduction percentage
- TSX**, *see* Toronto Stock Exchange
- TTY device**, *see* Teletypewriter
- T-Bill**, *see* Treasury bill
- “Tainted” spouse trust**, *see also* Pre-1972 spousal trust
- relieving rule, 70(7)
- Takeover**, *see also* Control of corporation: change of
- reverse, 256(7)(c)–(c.2)
- Talk show**
- ineligible for Canadian film/video credit, Reg. 1106(1)“excluded production”(b)(ii)
 - ineligible for film/video production services credit, Reg. 9300(2)(b)
- Talking textbooks**
- disability supports deduction, 64(a)A(ii)(I)
 - medical expense credit, Reg. 5700(w)
- Tank, oil or water storage**
- capital cost allowance, Reg. Sch. II:Cl. 6, 8, 29, 40
- Tapestry**
- hand-woven, whether CCA allowed, Reg. 1102(1)(e)
- Tar sands, defined**, 248(1), *see also* Oil sands
- Tar sands ore**
- defined, Reg. 1104(2), 1206(1)
 - processing of, Reg. 1104(5)(a)(iii), 1104(5)(c)(iii), 1104(6)(a)(iii), 1104(9)(f)(iii), 1204(1)(b)(ii)(C), 1204(1)(b)(iii)(C), 1204(1)(b)(iv)(C), 5201(c.3)
 - excluded from M&P credit, 125.1(3)“manufacturing or processing”(f)(iii)
 - investment tax credit, 127(9)“qualified property”(c)(vi)(C)
- Tawich case overruled**, 149.1(1)“qualified donee”(a)(iii), 149(1)(d.5)
- Tax**
- abatement, *see* Tax abatement
 - addition to, for income not earned in a province, 120(1)
 - additional
 - on non-Canadian corporations carrying on business in Canada, 219
 - agreement, *see* Tax treaty
 - application of payments under collection agreement, 228
 - assets used as security by DPSP trust, on, 198
 - attempt by partners to reduce or postpone, 103
 - avoidance, *see* Anti-avoidance rules
 - branch, 219
 - “business-income tax” defined, 126(7)
 - carved-out income, on, 209
 - collection of, *see* Collection of tax
 - computation of, 117(5.2), *see also* Computation of tax, Reg. Part I
 - convention, *see* Tax treaty
 - corporate distributions, on, 183.1
 - indirect payments, 183.1(5)
 - limitation, 183.1(6)
 - stock dividends repurchased for excessive amount, 183.1(3)
 - subsec. 110.6(8) not applicable, 183.1(7)
 - corporations, 123–125.1
 - court, *see* Tax Court of Canada
 - credits, *see* Tax credits
 - debt to Her Majesty, 222(2)
 - deduction at source
 - amount of, deemed received by payee, 153(3)
 - required of payer, 153
 - tables, Reg. Sch. I
 - deduction from, *see* Tax credits
 - deduction of, Reg. Part I
 - deductions in computing, *see* Deductions in computing tax
 - deferred income plans, on, *see also* Deferred income plans
 - deferred profit sharing plans, on, 198–204
 - tax on non-qualified investments and assets used as security, 198
 - estimate to be made, 151
 - evasion, *see* Tax evasion, penalty for
 - excessive capital dividend or capital gains dividend elections, on, 184
 - failure to remit amounts withheld, 227(9)
 - salary or wages, from, 227(9.5)
 - failure to withhold, 227(8)
 - assessment for, 227(10)
 - salary or wages, from, 227(8.5)
 - foreign, *see* Foreign taxes
 - forfeiture under deferred profit sharing plan, 201
 - imposed, *see* Liability for tax
 - income from Canada of non-residents, on, 212–218
 - income from property transferred at non-arm’s length, on, 160(1)–(3)
 - interest on unpaid amount, 161(1)
 - investment income of life insurers, on, 211–211.5
 - large corporations, *see* Large corporations tax (Part I.3)
 - liability for, *see* Liability for tax
 - logging
 - deduction for, 127(1), Reg. Part VII
 - defined, 127(2)
 - manufacturing and processing deduction, 125.1
 - mining, deduction, 20(1)(v), Reg. 3900
 - “non-business-income tax” defined, 126(7)
 - non-deductible, 18(1)(t)
 - non-qualified investments of deferred profit sharing plan, on, 198, 199
 - non-residents, *see* Non-resident tax
 - otherwise payable
 - defined, 120(4)“tax otherwise payable under this Part”, 126(7)“tax for the year otherwise payable under this Part”
 - over-contributions to deferred income plans, on, 204.1–204.3
 - overpayment, defined, 164(7)
 - Part I.2, deduction for, 60(w)
 - Part II, 182(1)
 - Part II.1, 183.1
 - Part II.2, 183.3–183.4
 - Part IV
 - reduction in, re Part IV.1 tax payable, 186(1.1)
 - Part IV.1, 187.2, 187.3
 - reduction in Part IV tax re, 186(1.1)
 - Part VI.1, 191–191.4
 - Part VI.2, 191.5–191.6
 - Part XII.3
 - deductible from income of life insurer, 138(3)(g)
 - payable, *see also* Liability for tax
 - amount deemed to be, 20(1)(II)
 - corporations, 123
 - non-resident, on branch profits, 219
 - defined, 117(1), 248(2)
 - inter vivos trust, by, 122
 - payment of, *see* Payment of tax
 - property disposed of by public authorities, re, 207.3, 207.4
 - property held by trusts governed by deferred income plans, re, 207.1, 207.2
 - rates of, *see* Rates of tax
 - recovery by deduction or set-off, 224.1
 - refund of overpayment, *see also* Refund
 - refundable, *see* Refundable Part IV tax
 - registered charities, 188, 189
 - registered investments, re, 204.4–204.7
 - registered securities dealers, re securities lending arrangement payments to non-residents, 212(19)
 - return, *see* Returns
 - revoked plans, on, 198
 - security for, 220(4)–(4.4)

Index

- Tax** (*cont'd*)
- shelter, *see* Tax shelter
 - small business deduction, 125
 - surtax
 - • individual (before 2001), 180.1
 - • corporation (before 2008), 123.2
 - taxable dividend received by private corporation, 186
 - tobacco manufacturers, 182, 183
 - tobacco manufacturing income, 182
 - treaty, *see* Tax treaty
 - unpaid, interest on, 227(9.3)
 - withheld at source
 - • deemed to discharge debt, 227(13)
 - • failure to remit, 227(9)
 - • held in trust, 227(4), (4.1)
 - • not part of estate, 227(5)
 - withholding of, *see* Withholding
- Tax abatement**
- corporations, 124
 - individuals, Reg. 6401
 - • prescribed dates, Reg. 6401
 - • province providing schooling allowance, 120(2)
 - manufacturing and processing, 125.1
 - not available to Crown corporations, 124(3)
 - small business, 125
- Tax accounts**
- transfer of instalments between, 221.2
- Tax advisor**
- penalty for misrepresentation by, 163.2
- Tax agreement**, *see* Tax treaty
- Tax anniversary date**
- defined, Reg. 310
- Tax attribute**
- defined, for tax-debt avoidance penalty, 160.01(1)
- Tax attribute transaction**
- defined, 160.01(1)
- Tax avoidance**, *see* Anti-avoidance rules
- Tax avoidance motive**, *see also* Anti-avoidance rules
- Tax avoidance policy**
- defined (life insurance policy), Reg. 310
 - deemed not to be exempt policy, Reg. 306(1)
- Tax basis**
- defined, 142.4(1), Reg. 9100, 9200(1)
 - • variation in, for certain insurers, 138(13)
 - used as cost amount for specified debt obligation, 248(1)“cost amount”(d.2)
- Tax benefit**
- defined
 - • for notifiable transactions, 237.3(1)
 - • for reportable transactions, 237.3(1)
 - • for tax-debt avoidance penalty, 160.01(1), 163.2(1)
 - • general anti-avoidance rule (GAAR), 245(1)
 - • transfer pricing documentation, 247(1)
- Tax consequences, defined**, 245(1)
- Tax convention**, *see* Tax treaty
- Tax Court of Canada**, *see also* Appeal
- appeal from, to Federal Court of Appeal, *see* Federal Court of Appeal
 - appeal to, 169
 - • application to all taxpayers with common issue, 174
 - • general procedure, 175
 - • informal procedure, 170
 - • only on grounds raised in objection, 169(2.1)
 - • prohibited where right waived by taxpayer, 169(2.2)
 - • settlement of appeal, 169(3)
 - • time not counted, 174(5)
 - • valuation of ecological property, 169(1.1)
 - application for extension of time
 - • for appeal, 167
 - • for notice of objection, 166.2
 - disposal of appeal, 171(1)
 - • on specific issue, 171(2)–(4)
 - reference to
 - • common questions, 174
 - tax shelter appeal, common question, 174
 - where no reasonable grounds for appeal, 179.1
- Tax credits**, *see also* Deductions in computing tax
- adoption expenses, 118.01
 - aged 65 and over, 118(2)
 - apportionment of, *see* Splitting, sharing or apportionment
 - basic minimum, 127.531
 - basic personal, 118(1)B(c)
 - CPP contributions, 118.7
 - Canada employment, 118(10)
 - caregiver (infirm dependant)
 - • additional amount, 118(1)B(a)(ii)C(A), 118(1)B(b)(iv)D(A), 118(1)B(b.1), 118(1)B(c.1)E(a)
 - • base amount
 - • • after 2016, 118(1)B(d)
 - • • before 2017, 118(1)B(c.1)
 - charitable donations, 118.1
 - child (pre-2015), 118(1)B(b.1)
 - children’s arts (pre-2017), 118.031
 - children’s fitness, 118.03 [before 2015], 122.8 [2015–16]
 - dependants, 118(1)B(b), (c), (d)
 - • support payments, effects of, 118(5)
 - digital news subscriptions, 118.02
 - disability, 118.3
 - disability home buyer, 118.05
 - employment, 118(10)
 - employment insurance premiums, 118.7
 - equivalent-to-married status, 118(1)B(b)
 - family caregiver, *see* caregiver (above)
 - first-time home buyer, 118.05
 - First Nations tax paid, 120(2.2)
 - fitness, 118.03 [before 2015], 122.8 [2015–16]
 - foreign taxes, 126
 - fraudulently obtained, offence, 239(1.1)
 - GST/HST, 122.5
 - gifts, 118.1
 - home accessibility (senior or disabled person), 118.041
 - individual, 118
 - in-home care of relative
 - • after 2016, no specific credit, *see* caregiver (above)
 - • before 2017, 118(1)B(c.1)
 - • investment, 127(5)–(36), 127.1, *see also* Investment tax credit
 - labour-sponsored funds, 127.4
 - lump-sum averaging, 120.31
 - manufacturing and processing, 125.1
 - married status, 118(1)B(a)
 - medical expenses
 - • non-refundable credit, 118.2
 - • refundable credit, 122.51
 - mental or physical impairment, expenses related to, 118.2(2)(b), (c)
 - non-resident individual, 118.94
 - online newspapers, 118.02
 - ordering of, 118.92
 - overseas employment (pre-2016), 122.3
 - part-year resident, 118.91
 - pension income, 118(3)
 - personal, 118(1)
 - • limitations, 118(4)
 - • not available to trust, 122(1.1)

Index

- Tax preparer (*cont'd*)
- required to file electronically, 150.1(2.3), (2.4)
 - • penalty (filing fee) for non-compliance, 162(7.3)
- Tax protestors**, 2(1) (Notes), 248(1)“person” (Notes)
- Tax rebate discounting**, 220(6) (Notes)
- Tax return**, *see* Returns
- Tax shelter**
- appeal of assessment, binding on all taxpayers in same shelter, 174
 - art, *see* Art flips
 - business does not entitle individual to June 15 filing deadline, 150(1)(d)(ii)(A)
 - Canadian film credit not available, 125.4(4)
 - charitable donations, 237.1(1)“gifting arrangement”
 - • collection of half of tax in dispute, 164(1.1)(d)(ii)(B), 225.1(7)
 - computer equipment, *see* Computer tax shelter property
 - computer software, *see* Computer tax shelter property
 - cost of, 143.2
 - deduction disallowed
 - • where identification number not provided, 237.1(6)
 - • where penalty unpaid, 237.1(6.1)
 - defined, 237.1(1)
 - film, *see* Motion picture film
 - fiscal period, election for non-calendar year prohibited, 249.1(5)
 - identification number
 - • application for, by promoter, 237.1(2)
 - • display of, required, 237.1(5)
 - • issuance of, by Minister, 237.1(3)
 - • penalty for false information in application, 237.1(7.4)
 - • penalty for selling shelter before number issues, 237.1(7.4)
 - • prerequisite for deduction, 237.1(6)
 - • prerequisite of sale etc., 237.1(4)
 - • provision of, to buyers, 237.1(5)
 - information outside Canada, 143.2(13), (14)
 - information return
 - • promoter must file, 237.1(7)–(7.5)
 - • • extended reassessment deadline if not filed, 152(4)(b.1)
 - • tax shelter number to be included, 237.1(5)(c)
 - investment, 143.2
 - • defined, 143.2(1)“tax shelter investment”
 - • matchable expenditure, 18.1(13)
 - • reassessment, no limitation period, 143.2(15)
 - matchable expenditure rules, 18.1
 - minimum tax on deductions, 127.52(1)(c.3)
 - Minister’s powers of investigation, 237.1(8)
 - MURB, *see* Multiple unit residential buildings
 - mutual fund limited partnership, 18.1
 - prescribed benefit, Reg. 3100
 - promoter
 - • application for identification number, 237.1(2)
 - • defined, 237.1(1)
 - • information return, 237.1(7)
 - • provision of identification number to buyers, 237.1(5)
 - sales prohibited without identification number, 237.1(4)
 - software, *see* Computer tax shelter property
 - yacht, *see* Yacht
- Tax shelter investment**, *see* Tax shelter: investment
- Tax sparing, pre-1976 investment**, Reg. 5907(10)
- Tax transfer payments to provinces**, 154, Reg. 3300
- Tax treatment**
- defined, for mandatory disclosure rules, 237.3(1), 237.4(1), 237.5(1)
- Tax treaty**, *see also* Tax information exchange agreement
- amounts exempt under, deduction for, 110(1)(f)(i)
 - anti-treaty shopping rule, Canada-U.S. Tax Treaty:Art. XXIX-A
 - Canada–U.K., *see* Table of Contents
 - Canada–U.S., *see* Table of Contents
 - competent authority agreement deemed valid, 115.1
 - country with, foreign affiliate in, Reg. 5907(11)–(11.2)
 - credit for departing resident to country with which Canada has, 126(2.21)
 - deduction from income, 110(1)(f)(i)
 - deemed resident in Canada due to family member, 250(1)(g)
 - defined, 248(1)
 - designated treaty country (FAPI rules), Reg. 5907(11), (11.1)
 - disclosure of information as permitted by, 241(4)(e)(xii)
 - dividend limitation in
 - • applies for branch tax, 219.2
 - • applies for corporate emigration tax, 219.3
 - exempting Canadian person from tax, 250(5)
 - gains deemed to arise in Canada, *Income Tax Conventions Interpretation Act* s. 6.3
 - income exempt under, 126(7)“tax-exempt income”
 - income exempt under, not earned income for RRSP, 146(1)“earned income”(c)
 - interpretation of, *Income Tax Conventions Interpretation* (reproduced before the treaties)
 - list of, *see* Table of Contents
 - listed countries, Reg. 5907(11)–(11.2)
 - non-resident under, deemed non-resident of Canada, 250(5)
 - partners exempted by, new partner joining partnership, 96(8)
 - property exempted under, 108(1)“exempt property”
 - requirement to file return to claim exemption, 150(1)(a)(ii)
 - tax on disposition of property by non-resident deferred under, 115.1
 - • election, time of making, Reg. 7400(2)
 - • prescribed provisions, Reg. 7400(1)
- Taxable amount**
- amount, *see* Taxable capital amount
- Taxable benefits**, *see* Benefit
- Taxable Canadian business**
- defined, 95(1)
 - application to FAPI rules, 95(2)(j.1), (k), (k.2)
- Taxable Canadian corporation**
- defined, 89(1)“taxable Canadian corporation”
 - prescribed, for Canadian film/video credit, Reg. 1106(2)
 - property disposed of to taxpayer
 - • cost base, addition to, 53(1)(f.1)
- Taxable Canadian life investment income**
- defined, 211.1(2)
- Taxable Canadian property**, *see also* Property
- defined, 248(1)
 - • excludes shares of demutualized life insurer or holding corporation, 141(5)
 - • exclusions for branch tax purposes, 219(1.1)
 - disposition of, by non-resident, 116
 - • purchaser liable for tax, 116(5)
 - • taxable, 2(3)(c)
 - distributed on foreign affiliate liquidation and dissolution, 88(3.5)
 - distribution to non-resident beneficiaries
 - • tax on, 107(5)
 - • • security for tax, 220(4.6)–(4.63)
 - excluded from deemed disposition
 - • on becoming resident, 128.1(1)(b)(i)
 - foreign merger, rollover on, 87(8.4), (8.5)
 - includes option, 248(1)“taxable Canadian property”(f)
 - mutual fund, of, *see* TCP gains distribution
 - prorating for gains before May 1995, 40(9)
 - replacement of
 - • capital property, 44(5)(c), (d)
 - • depreciable property, 13(4.1)(c), (d)
 - rollover of, 85(1)(i), 85.1(1)(a)

- Taxable Canadian property** (*cont'd*)
- on foreign merger, 87(8.4), (8.5)
 - ship or aircraft used in international traffic, 248(1)“taxable Canadian property”(b)(ii)
 - transitional rule re property not covered before April 26/95, ITAR 26(30)
- Taxable capital**
- for financial institutions tax
 - defined, 190.12
 - employed in Canada, defined, 190.11
 - for large corporations tax (pre-2006)
 - defined, 181.2(2), 181.3(2)
 - tax on (pre-2006), 181.1(1)
 - employed in Canada, defined, 181.2(1), 181.3(1), 181.4, Reg. 8601
- Taxable capital amount**
- defined, 66(12.6011)
 - limit of \$15 million for pre-2019 flow-through of CDE as CEE, 66(12.601)(a.1)
- Taxable capital employed in Canada**
- defined
 - for financial institutions tax, 190.11
 - for large corporations tax, 181.2(1), 181.3(1), 181.4
 - for renunciation of pre-2019 CDE as CEE on flow-through shares, 66(12.6011)
- Taxable capital gain**, *see* Capital gain
- Taxable conversion benefit**, *see also* Conversion benefit
- defined, for insurance demutualization, 139.1(1)
- Taxable deficit (of foreign affiliate)**
- defined, Reg. 5907(1)
- Taxable dividend**
- deemed, *see* Dividend: deemed
 - defined, 89(1), 112(6)(a), 129(1.2), 129(7), 133(8), 248(1)
 - for purposes of debt forgiveness, 80.03(1)(b)
 - for purposes of dividend refund, 129(7)
 - for purposes of stop-loss rules, 112(6)(a)
 - generally, 89(1), 248(1)
 - partnership receiving, 186(6)
- Taxable earnings (of foreign affiliate)**
- defined, Reg. 5907(1)
- Taxable income**
- communal organization, election re, 143(2), (3)
 - computation of, 110–114
 - deductions, *see* Deductions in computing taxable income
 - individual
 - order of application, 111.1
 - resident for part of year, 114, 114.1
 - deductions in computing, *see* Deductions in computing taxable income; Tax credits
 - defined, 2(2)
 - determination of, by Minister, 152(1.11), (1.12)
 - earned in a province by a corporation, Reg. Part IV
 - earned in Canada, *see* Taxable income earned in Canada
 - earned in the year in a province, 124(4)
 - life insurer, 138(7)
 - non-resident, earned by in Canada, 115
 - non-resident person, 115
- Taxable income earned in Canada**, 115
- defined, 115(1), 248(1)
 - determination of, by Minister, 152(1.11), (1.12)
 - foreign resource pool expenses, 115(4.1)
- Taxable interest expense**
- defined, 218.2(2)
- Taxable life insurance policy**
- defined, 211(1)
- Taxable loss (of foreign affiliate)**
- defined, Reg. 5907(1)
- Taxable net gain**
- from listed personal property, defined, 41(1), 248(1)
- Taxable non-portfolio earnings**
- defined, 197(1)
 - reduced by Part IX.1 tax payable by SIFT partnership, 96(1.11)(b)
- Taxable obligation**
- defined, 240(1)
- Taxable preferred share**
- defined, 248(1)
 - dividends excepted from tax, 187.1
 - tax on corporation paying dividends on, 191–191.4
 - agreement to transfer tax liability to related corporation, 191.3
 - assessment by Minister, 191.3(3), (5)
 - payment by transferor corporation, 191.3(6)
 - where of no effect, 191.3(4)
 - amalgamation, 87(2)(rr)
 - associated corporations, 191.1(3)
 - failure to file agreement, 191.1(5)
 - total dividend allowance, 191.1(4)
 - dividend allowance, 191.1(2)
 - short years, in, 191.1(6)
 - total, for associated corporations, 191.1(4)
 - excluded dividend, defined, 191(1)
 - financial intermediary corporation, defined, 191(1)
 - information return, 191.4(1)
 - private holding corporation, defined, 191(1)
 - substantial interest, 191(2), (3)
 - tax payable, 191.1(1)
 - election, 191.2
 - tax on dividends received by corporation, 187.2
 - information return, 187.5
 - partnerships, 187.4
- Taxable RFI share**
- amalgamation, effect of, 87(4.2)
 - defined, 248(1)
 - tax on dividend, 187.3(1)
- Taxable SIFT distributions**
- defined, Reg. 414(1), (2)
- Taxable SIFT trust distributions**
- defined, 122(3)
 - excluded in determining province of residence of trust, Reg. 2608
 - tax on, 122(1)(b)B
- Taxable supplier**
- defined, 127(9)
- Taxable surplus**
- election to come before hybrid surplus, Reg. 5901(1.1)
 - portion of dividend deemed paid out of, Reg. 5900(1)(a)
- Taxable surplus (of foreign affiliate)**
- adjustment where gain deemed due to negative adjusted cost base, 93(1)(b)(ii)
 - deduction for dividend paid out of, 113(1)(b), (c), Reg. 5900(1)(b)
 - defined, 113(1)(b)(ii), Reg. 5907(1)
- Taxation year**, *see also* Fiscal period
- becoming or ceasing to be CCPC, deemed year-end, 249(3.1)
 - becoming or ceasing to be exempt, deemed year-end, 149(10)
 - becoming or ceasing to be financial institution, deemed year-end, 142.6(1)
 - ceasing to carry on business, 25(1)
 - change of control, deemed year-end, 249(4)
 - company formed by amalgamation, of, 87(2)(a)
 - corporation, of
 - longer than 365 days, 249(3)
 - deemed “fiscal period”, 14(4) [before 2017]

Index

- Taxation year (*cont'd*)
- defined, 11(2), 142.6(1), 149(10), 149.1(1), 249, Reg. 1104(2), 1802(5), 3700
 - • of mutual fund following rollover, 132.2(3)(b), 132.2(3)(1)(ii)
 - employees profit sharing plan trust, 144(11)
 - first, of mortgage investment corporation, 130.1(8)
 - fiscal period of business, and, 11(2)
 - foreign affiliate, of, 95(1)“taxation year”
 - individual, of, 11(2), Reg. 1104(2)
 - less than 12 months, *see* Short taxation year
 - mutual fund trust, election for December 15, 132.11
 - non-resident, of, 250.1(a)
 - partnership, of, 96(1)(b)
 - reference to, 249(2), (3)
 - registered Canadian amateur athletic association, of, 149.1(1)“taxation year”
 - registered charity, of, 149.1(1)“taxation year”
 - short, *see* Short taxation year
- Taxed capital gains (of investment corporation, mutual fund corporation or mutual fund trust)**
- defined, 130(3)(b), 131(7), 132(5)
- Taxicabs**, Reg. Sch. II:Cl. 16
- Taxing country**
- defined
 - • for FAPI, Reg. 5910(4)
 - • for foreign tax credit, 126(7)
- Taxpayer**
- absconding, 226
 - bankrupt, 128
 - becoming Canadian resident, ITAR 26(10)
 - ceasing to be resident, *see* Non-resident: becoming
 - death of, *see* Death of taxpayer
 - defaulting, 226
 - defined, 248(1)
 - • for interest deduction restrictions, 18.2(1)
 - • includes partnership for certain purposes, 18.1(1), 56.4(1), 96(2.01), 125.6(2.2), 143.2(1), 143.3(1), 143.4(1)“taxpayer”
 - investigation, under
 - rights of, at inquiry, 231.4(6)
 - leaving Canada, demand for amounts owing, 226
 - not limited to person liable for tax, 248(1)
- Taxpayer Identification Number**, *see* TIN (Taxpayer Identification Number)
- Taxpayer information**
- defined, 241(10)
 - provision of
 - • authorized, 241(4)
 - • prohibition against, 241(1)
- Taxpayer relief**
- late elections, 220(3.2)–(3.7)
 - reassessments after normal reassessment period, 152(4.2), 164(1.5)
 - waiver of penalty and interest, 220(3.1)
- Teacher**
- contribution to teachers’ exchange fund, 8(1)(d)
 - exemption for travel expenses, 81(3.1)(a)(ii)
 - registered pension plan, contribution to, 147.2(5)
 - sabbatical arrangement, Reg. 6801(a)
 - • exemption for recontributed amount received from plan, 81(1)(s)
- Teacher school-supplies credit**, 122.9(2)
- prescribed durable goods, Reg. 9600
- Teaching supplies**
- defined, for teacher school-supplies credit, 122.9(1)
- Technical guide**
- Natural Resources, *see* Department of Natural Resources
- Teck-Bullmoose case overruled**, 13(7.5)
- Telecom NZ-Chorus Ltd. spinoff**, Reg. 5600(f)
- Telecommunication spacecraft**
- capital cost allowance, Reg. Sch. II:Cl. 10(f.2), Sch. II:Cl. 30(a)
 - • separate classes, Reg. 1101(5a)
- Telecommunications**
- defined, *Interpretation Act* s. 35(1)
- Teleglobe Canada, subject to tax**, 27(2), Reg. 7100
- Telegraph system**
- defined, Reg. 1104(2)
- Telephone and telegraph equipment**
- capital cost allowance, Reg. Sch. II:Cl. 3, Sch. II:Cl. 17
- Telephone and telegraph systems**
- capital cost allowance, Reg. Sch. II:Cl. 17
 - defined, Reg. 1104(2)
- Telephone cable**
- capital cost allowance, Reg. Sch. II:Cl. 42(b)
- Telephone ringing indicator**
- disability supports deduction, 64(a)A(ii)(B)
 - medical expense credit, Reg. 5700(k)
- Teletypewriter**
- disability supports deduction, 64(a)A(ii)(B)
 - medical expense credit, Reg. 5700(k)
- Television commercial message**
- capital cost allowance, Reg. Sch. II:Cl. 12(m)
 - defined, Reg. 1104(2)
- Television decoder (to visually display vocal portion of signal)**
- medical expense, Reg. 5700(q)
- Television set-top box**
- capital cost allowance, Reg. Sch. II:Cl. 30(b)
- Tellurium**, *see* Critical mineral
- Temporary access road**, *see* Specified temporary access road
- Temporary relocation deduction**
- defined, for labour mobility deduction, 8(14)(f)
- Temporary wage subsidy (COVID-19)**, 153(1.02)–(1.04)
- Temporary work location**
- defined, for labour mobility deduction, 8(14)(b)
- Ten-eight policy**, *see* 10/8 policy [at end of Index]
- Ten-year gift (to charity)**, *see* Enduring property [repealed]
- Tenant inducements**
- taxable as income, 12(1)(x)
- Term insurance**
- defined, Reg. 2700(1)
- Term preferred share**
- defined, 248(1)
 - dividends on
 - • deemed, 84(4.2), 258(2)
 - • received by specified financial institution, 112(2.1)
 - • • deemed interest on, 258(3)(a)
 - reduction of paid-up capital, deemed dividend, 84(4.2)
 - share-for-share exchange, 87(4.1)
- Terminal loss**
- deduction for, 20(16)
 - • after ceasing to carry on business, 20(16.3)
 - limitation re passenger vehicles, 20(16.1)(a)
 - limitation re franchise or licence exchanged, 20(16.1)(b)
 - limitation where property acquired by affiliated person, 13(21.2)(e)(i)
- Terminating corporation**
- class A shares can be issued to, for LSVCC, 204.81(1)(c)(ii)(A)
 - defined, for labour-sponsored venture capital corporations, 204.8(1)
- Termination of business**, *see* Ceasing to carry on business

- Termination payment**, *see* Retiring allowance
- Territorial sea**
- defined, *Interpretation Act* 35(1)
- Territory**
- defined, *Interpretation Act* 35(1)
- Terrorism**, *see* Charities Registration (Security Information) Act
- Tertiary recovery equipment**, Reg. 1206(1)
- Test wind turbine**
- allowed as CRCE, Reg. 1219(1)(g)
 - defined, Reg. 1219(3)
- Testamentary trust**, *see* Trust (or estate): testamentary
- Texas partnership**
- losses disallowed, 96(8)
- Textbook tax credit**, 118.6(2.1)
- Textbooks, talking**, *see* Talking textbooks
- Theatres relief (COVID)**, Reg. 8901.1(2)(b)(iv), (xiv), *see also* Qualifying tourism or hospitality entity
- Theme parks relief (COVID)**, Reg. 8901.1(2)(b)(viii), *see also* Qualifying tourism or hospitality entity
- Therapy**
- medical expense credit
 - general, 118.2(2)(1.9)
 - rehabilitative, for speech or hearing loss, 118.2(2)(1.3)
 - non-taxable employment benefit, 6(1)(a)(iv)
- Thermal waste**
- defined, Reg. 1104(13)
- Thin capitalization rules**, 18(4)–(8)
- back-to-back loans, 18(6), (6.1)
 - deemed dividend for non-resident withholding tax, 214(16), (17)
 - income inclusion for corporate partner, 12(1)(l.1)
 - interest not deductible, 18(4)–(6)
 - trust designation of thin-cap interest paid to non-resident as being payment to beneficiary, 18(5.4)
- Things**, *see* Property; Rights or things
- Third party**
- defined, for amateur athlete trusts, 143.1(1)
 - demand, *see* Third party demand
 - payment, *see* Scientific research and experimental development: third party payment
 - penalty for misrepresentation by, 163.2
- Third party demand**
- information, for, 231.2(1)
 - payment, for, *see* Garnishment for taxes unpaid
- Threshold amounts**, *see* Dollar amounts in legislation and regulations
- Tidal energy, electricity generation equipment**
- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xiv), Sch. II:Cl. 43.2
- Tiers of partnerships**
- look-through rules, 15(2.14)(b), 18.4(18), 66.8(3)(b), 91(4.4), 93.1(3), 96(2.01), 102(2), 126(4.13), 149.1(11), 163(2.8), 233(3), 233.1(5), 233.3(2), 233.4(3), 247(6), Reg. 1100(12)(b)(ii), 1100(16)(b)(ii), 1100(25)(b)(iv)(B), 1100(26)(b)(ii)
 - at-risk rules, 96(2.01), 96(2.1)(f)
 - capital gains deduction, 110.6(14)(d.1)
 - foreign affiliate determination, 93.1(3), Reg. 5908(9)
 - Large Corporations Tax, 181.2(3)(g)A(b)(i), 181.2(5)
 - Part VI.1 tax, 191(6)
 - partnership rules generally, 96(2.01), 102(2)
- Tile drainage, deduction**, 30
- Tilesetter**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Timber limits**
- capital cost allowance, Reg. 1100(1)(e), Reg. Sch. VI
 - separate classes, Reg. 1101(3)
 - disposition of by non-resident, 216(5)
 - equipment for use in, capital cost allowance, Reg. Sch. II:Cl. 10(n), Sch. II:Cl. 15
- Timber resource property**
- capital cost allowance, Reg. Sch. II:Cl. 33
 - constitutes taxable Canadian property for certain purposes, 248(1)“taxable Canadian property”(n)(ii)
 - defined, 13(21)
 - disposition of
 - by non-resident, 216(5)
 - no capital gain, 39(1)(a)(v)
 - proceeds of disposition, 20(5.1)
 - in corporation, share is taxable Canadian property, 248(1)“taxable Canadian property”(e)(i)(C), (ii)(C)
 - in partnership, constitutes taxable Canadian property, 248(1)“taxable Canadian property”(g)(iii)
 - non-arm’s length transfer, exclusion from rule, 13(7)(e)
 - undepreciated capital cost, 13(21)“undepreciated capital cost”G
- Timber royalty**
- paid to non-resident, 212(1)(e)
 - alternative re, 216
- Time**
- deadlines and time limits for taxpayers, *see* Deadlines
 - expiring to recover a debt, *see* Statute-barred debt, deemed settled
 - extension of, *see* Extension of time
 - non-resident, *see* Non-resident time
 - reassessment, for, *see* Reassessment
- Time Limits and Other Periods Act (COVID-19)**, 152(3.1) Notes
- Tips**, *see also* Informant payments
- source withholding, Reg. 100(1)“remuneration”(a.1)
 - taxable as employment income, 5(1)
- Titanium**, *see* Critical mineral
- Title insurance**
- defined, for insurers’ policy reserves, Reg. 1408(1)
- Titles in legislation**
- relevance of, *Interpretation Act* s. 14
- Tobacco manufacturers’ surtax**, 182, 183
- Toilet**
- mechanical aid for getting on and off, medical expense, Reg. 5700(g)
- Tool and die maker**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Tools**
- apprentice mechanics, *see* Apprentice: mechanic
 - eligible, *see* Eligible tool
 - employed tradesperson, deduction, 8(1)(s)
 - portable, for rental
 - capital cost allowance, Reg. Sch. II:Cl. 10(b), Sch. II:Cl. 29
 - small, capital cost allowance, Reg. Sch. II:Cl. 12(h)
- Top-up disability payment**
- defined, 6(17)
 - not taxable as employee benefit, 6(18)
 - reimbursement to employer, 8(1)(n.1)
- Top-up percentage**
- defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)
- Top-up revenue reduction percentage**
- defined, for COVID-19 Canada Emergency Wage Subsidy, 125.7(1)
- Toronto Stock Exchange**
- prescribed securities exchange investment, Reg. 9002.2
 - prescribed stock exchange, 262
- Total assets (of financial institution)**
- defined, 181(2), 190(1.1), Reg. 8600

- Total base period remuneration**
- defined, for Canada Recovery Hiring Program, 125.7(1)
- Total charitable gifts**
- credit for, 118.1(1)“total gifts”(a), 118.1(3)
 - defined, 118.1(1)
- Total corporate holdings percentage**
- defined, for private foundations, 149.1(1)
- Total Crown gifts**
- credit for, 118.1(1)“total gifts”(b), 118.1(3)
 - defined, 118.1(1)
- Total cultural gifts**
- credit for, 118.1(1)“total gifts”(c), 118.1(3)
 - defined, 118.1(1)
- Total current period remuneration**
- defined, for Canada Recovery Hiring Program, 125.7(1)
- “Total depreciation” defined, 13(21)**
- Total ecological gifts**
- credit for, 118.1(1)“total gifts”(d), 118.1(3)
 - defined, 118.1(1)
- Total pension adjustment reversal, *see also* Pension adjustment reversal**
- defined, 248(1), Reg. 8304.1
- Total per location expense**
- defined, for air quality improvement credit, 127.43(1)
- Total premiums**
- defined, Reg. 8600
- Total remuneration**
- defined, for a taxation year, Reg. 100(1)
- Total reserve liabilities (of financial institution)**
- defined, 181(2), 190(1.1), Reg. 8600
- Total return (from fixed payment obligation)**
- defined, Reg. 9100
- Total specified indebtedness**
- defined, for FAPI of banks, 95(2.43)
- Total ventilation expense**
- defined, for air quality improvement credit, 127.43(1)
- Totally and permanently disabled**
- defined, Reg. 8500(1)
- Tourism and Hospitality Recovery Program, 125.7(1)“base percentage”(l)(i)(B)(I), (m)(i)(B)(I)**
- Tourism relief (COVID), *see* Qualifying tourism or hospitality entity**
- Townsite costs**
- capital cost allowance, Reg. 1102(18) [repealed], Reg. Sch. II:Cl. 10(1)
 - deemed capital cost, 13(7.5)(a), Reg. 1102(14.2)
- Tracked entity**
- defined, 95(8)
- Tracked interest rules, *see* Foreign investment entity: tracked interests**
- Tracked policy pool**
- defined, 95(2)(a.21)(ii)
- Tracked property**
- defined, 142.2(1)“tracking property”
- Tracked property and activities**
- defined, 95(8)(a)
- Tracking arrangements**
- FAPI rules, 95(8)–(12)
- Tracking class**
- defined, 95(10)(b)
- Tracking interest**
- defined, 95(8)
- Tracking property**
- defined, for mark-to-market rules, 112(6)(c), 142.1(1)
 - dividend deduction denied to financial institution, 112(2.02)
- Tractor**
- capital cost allowance, Reg. Sch. II:Cl. 10(a), Sch. II:Cl. 16(g)
- Trade, adventure in, *see* Adventure in the nature of trade**
- Trade, board of, *see* Board of trade**
- Trade-in**
- allocation of consideration, 13(33)
- Trade mark, representation expenses, 13(12), 20(1)(cc), 20(9)**
- Trade show organizer relief (COVID), Reg. 8901.1(2)(b)(xx)(A), *see also* Qualifying tourism or hospitality entity**
- Trade union, *see* Union**
- Trader, *see* Dealer (or trader)**
- Trader or dealer in securities**
- defined
 - for security transactions, Reg. 230(1)
- Tradesman, *see* Tradesperson**
- Tradesperson**
- eligible tool, meaning of, 8(6.1)
 - licensing exam fees, tuition credit, 118.5(1)(d)
 - tools expense, deduction, 8(1)(s)
 - travel to construction job site, deduction, 8(1)(q.1)
- Trailers**
- capital cost allowance, Reg. Sch. II:Cl. 10(e)
 - rail suspension device for, Reg. Sch. II:Cl. 35(b)
- Train, *see* Railway**
- Training amount limit**
- defined, 122.91(2)
- Training courses**
- to care for infirm person, medical expense, 118.2(2)(1.8)
- Training credit, *see* Canada Training Credit**
- Tramway or trolley bus system**
- capital cost allowance, Reg. Sch. II:Cl. 4
 - defined, Reg. 1104(2)
- Transaction**
- defined
 - for general anti-avoidance rule, 245(1)
 - for hybrid mismatch arrangements, 18.4(1)
 - for notifiable transactions, 237.4(1), 245(1)
 - for reportable transactions, 237.3(1), 245(1)
 - for reporting uncertain tax treatment, 237.5(1), 245(1)
 - for section 160 avoidance planning, 160.01(1)
 - for transfer-pricing rules, 247(1)
 - information return re non-resident transactions, 233.1(1)
 - reportable, *see* Reportable transaction
 - series of, defined, 248(10)
 - with non-resident
 - extended reassessment period, 152(4)(b)(iii)
 - reporting requirement, 233.1
- Transfer**
- RRIF, from, *see* Registered retirement income fund: transfer from
- Transfer of business, *see* Sale: business**
- Transfer of forgiven amount (debt forgiveness rules), 80.04**
- Transfer of instalment payments, 221.2**
- Transfer of losses, *see also* Suspension of losses**
- deemed proceeds of disposition, 69(11)
- Transfer of property, *see also* Rollover**
- affiliated person, to, *see* Affiliated person
 - attribution rules, *see* Attribution rules
 - child, to
 - gain or loss deemed to be transferor’s, 75.1
 - controlled corporation, to
 - capital loss denied, 40(3.3), (3.4)
 - corporation, to
 - by partnership, 85(2)

- Transfer of property (*cont'd*)
 - partnership wound up, 85(3)
 - by shareholder, 85(1)
 - eligible property, 85(1.1)
 - to reduce income, 74.4(2)
 - outstanding amount, 74.4(3)
 - where benefit not granted to designated person, 74.4(4)
 - deferred profit sharing plan
 - from, 147(19)
 - family farm or fishing corporation or partnership, 70(9.2), (9.21)
 - *inter vivos*, 73(4), (4.1)
 - spouse trust, from, to children, 70(9.3), (9.31)
 - farm or fishing property, of, 73(3), (3.1)
 - to child, on death, 70(9), (9.01)
 - to parents, on death of child, 70(9.6)
 - *inter vivos*, to spouse or trust, 73
 - prescribed provincial laws, Reg. Part LXV
 - minor, to, 74.1(2), 74.5(1), (6)–(11)
 - repayment of, 74.1(3)
 - partnership, to, 97
 - registered disability savings plan, to another RDSP, 146.4(8), (9)
 - registered education savings plans, between, 146.1(2)(g.2), (i.2), 146.1(6.1)
 - registered pension plan, between benefit provisions, 147.3(14.1)
 - registered pension plan, from, 147.3
 - registered pension plan to annuity contract, 147.4
 - registered retirement savings plan, *see* Registered retirement savings plan: transfer
 - retirement compensation arrangement, to second RCA, 207.6(7)
 - revoked charity, by, 188(2)
 - spouse, to, 74.1(1), 74.5
 - death of taxpayer, on, 70(6)
 - deemed proceeds of disposition, 73
 - gain or loss, 74.2
 - repayment of, 74.1(3)
 - tax debtor, by, transferee liable, 160
 - trust, by
 - to another trust, 104(5.8), 248(1)“disposition”(e), (f), 248(25.1)
 - trust, to, 74.3, 74.5(9), (10), 75(3)
 - death of taxpayer, on, 70(6)
 - from another trust, 104(5.8), 248(1)“disposition”(e), (f), 248(25.1)
 - income imputed to transferor, 75(2)
 - unregistered pension plan, from, 60(j), 147.1(3)(a)
- Transfer payments**
 - tax, to provinces, 154
- Transfer price**
 - defined, 247(1)
- Transfer pricing (re non-residents), 247**
 - advance pricing agreements, Canada-U.S. Tax Treaty:Art. XXVI
 - anti-avoidance rules, 247, Canada-U.S. Tax Treaty:Art. IX
 - *bona fides* test, 247(2)(b)(ii)
 - CRA discretion to apply, 247(10)
 - capital adjustment, *see* Transfer pricing capital adjustment
 - capital setoff adjustment, *see* Transfer pricing capital setoff adjustment
 - contemporaneous documentation, 247(4)
 - deemed dividend to non-resident, 247(12)
 - guarantee for subsidiary excluded, 247(7.1)
 - income adjustment, *see* Transfer pricing income adjustment
 - income setoff adjustment, *see* Transfer pricing income setoff adjustment
 - loan to subsidiary excluded, 247(7)
 - order of applying rules, 247(2.1)
 - penalty, 247(3), (11)
 - royalties, Canada-U.S. Tax Treaty:Art. XII:7
 - secondary adjustments, 247(12)–(16)
- Transfer pricing capital adjustment**
 - defined, 247(1)
 - penalty, 247(3)(a)(i)(B)
- Transfer pricing capital setoff adjustment**
 - defined, 247(1)
 - reduces transfer pricing penalty, 247(3)(a)(iii)
- Transfer Pricing Guidelines (OECD)**
 - consistency required with, 247(2.03)
 - defined, 247(1)
- Transfer pricing income adjustment**
 - defined, 247(1)
 - penalty, 247(3)(a)(i)(B)
- Transfer pricing income setoff adjustment**
 - defined, 247(1)
 - reduces transfer pricing penalty, 247(3)(a)(iii)
- Transfer time**
 - defined, 132.2(1)“qualifying exchange”
- Transferee**
 - defined, re tax debt avoidance, 160(1), (5), 160.01(1)
- Transferee corporation**
 - defined, 55(1)“distribution”, 55(3.2)(h)
- Transferor**
 - defined, re tax debt avoidance, 160(1), (5), 160.01(1)
- Transferor trust**
 - defined, 107.4(2)
- Transferred capacity**
 - defined, for interest deduction restrictions, 18.2(1), (4), 248(1)
- Transferred policies**
 - defined, Reg. 1403(8)(b)
- Transit passes, *see* Public Transit Pass Credit**
- Transition amount**
 - accounting rule changes for financial institutions
 - defined, 142.51(1)
 - specified debt obligation
 - application on disposition of specified debt obligation, 142.4(6)(c)C, 142.4(7)
 - defined, 142.4(1), Reg. 9201
- Transition period**
 - defined, for SIFT stapled-security rules, 18.3(1)
- Transition property**
 - defined, 142.51(1)
- Transition year**
 - defined, for IFRS transitional rules for insurers, 138(12), 142.51(1)
- Transition year computation**
 - defined, for insurers, Reg. 2400(10)
- Transitional assistance under Canada–U.S. auto pact, income, 56(1)(a)(v)**
- Transitional eligible proceeds**
 - defined, for rollover to RDSP on death, 60.02(1)
- Transitional prohibited investment benefit**
 - defined, 207.01(1)
 - reduced tax on RESP or RDSP benefit, 207.05(5)
 - reduced tax on RRSP or RRIF benefit, 207.05(4)
- Transitional prohibited property**
 - adjusted cost base of, 207.01(7)
 - defined, 207.01(1)
 - exchange of property, 207.01(12), (13)
 - marriage or common-law partnership breakdown, 207.01(10), (11)
 - prohibited investment, 207.01(8), (9)

- Transitional reserve**
- for corporate partnership income, 34.2(1)“specified percentage”, 34.2(11)
- Transitional rules**, *see also* Grandfathering
- 1972 reform, ITAR 7–68
 - R.S.C. 1985 (5th Supp.), ITAR 69–79
 - stapled securities, 18.3(1)“transition period”, 18.3(3)(a)
- Transmission equipment**
- capital cost allowance, Reg. Sch. II:Cl. 47
 - defined (re energy conservation CCA), Reg. 1104(13)
- Transmission pipeline**
- capital cost allowance, Reg. Sch. II:Cl. 49
 - pumping or compression equipment, Reg. Sch. II:Cl. 7(j)
- Transparent affiliate**
- defined, for FAPI, Reg. 5907(1.091)
 - treatment of, Reg. 5907(1.092)
- Transplants, organ or bone marrow**
- medical expense, 118.2(2)(1.1)
- Transport employee**
- away-from-home expenses, deduction, 8(1)(g)
- Transport trailer technician**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Transportation**, *see also* International shipping
- delivered after the end of the year, reserve, 20(6)
 - passengers or property, Canada-U.S. Tax Treaty:Art. VIII:3, 4
- Transportation expenses**
- allowance for, not income, 6(6)(b)
 - as medical expenses, 118.2(2)(g)
 - • deemed payment of, 118.2(4)
- Transportation losses**, *see* Fuel
- Travel agency relief (COVID)**, Reg. 8901.1(2)(b)(iii), *see also* Qualifying tourism or hospitality entity
- Travelling expenses**
- allowance for, when not income, 6(1)(b)
 - employee’s, deduction for, 8(1)(h), (h.1)
 - • certificate of employer, 8(10)
 - • limitation, 8(4)
 - food and entertainment on train, plane or bus, 67.1(4)(a)
 - medical expense, as, 118.2(2)(h)
 - northern Canada, residents of, 110.7(1)
 - part-time employee’s, excluded from income, 81(3.1)
 - salesperson’s, deduction for, 8(1)(f)
 - • certificate of employer, 8(10)
 - • limitation, 8(4)
 - transport employee’s, 8(1)(g)
- Treasurer**, *see* Officer: corporation, of
- Treasury bill**
- yield at maturity treated as interest, 16(3)
- Treasury Board**
- defined, 248(1)
- Treaty**, *see* Tax treaty
- Treaty co-production (re Canadian film/video tax credit)**
- defined, Reg. 1106(3)
- Treaty-exempt property**
- defined, 116(6.1)
 - purchaser’s notice on acquisition from non-resident, 116(5.01), (5.02)
- Treaty-protected business**
- defined, 248(1)
 - losses, not usable against Canadian profits, 111(9)
- Treaty-protected property**
- acquisition from non-resident, purchaser’s notice requirement, 116(5.01), (5.02)
 - cannot absorb forgiven amount, 80(1)“excluded property”
 - defined, 248(1)
 - losses, not usable against Canadian gains, 111(9)
 - replacement property, 13(4.1)(d), 44(5)(d)
- Treaty shopping**, Canada-U.S. Tax Treaty:Art. XXIX-A
- Trestle**
- capital cost allowance, Reg. 1100(1)(zb), Reg. Sch. II:Cl. 3
 - separate classes, Reg. 1101(5f)
- Triangular amalgamation**, 87(9)
- Triangular foreign merger**, 87(8), (8.1)
- Triggering event**
- defined, for FAPI stub-period rules, 91(1.3)
- Trip cost**
- defined, for northern residents’ deduction, 110.7(6)
- Trolley bus system**, Reg. Sch. II:Cl. 4
- Truck**
- capital cost allowance, Reg. Sch. II:Cl. 10(a), Sch. II:Cl. 16(g)
- Truck and transport mechanic**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Truck driver**
- away-from-home expenses, deduction, 8(1)(g)
- Truck mechanic**, *see* Apprentice: mechanic
- Truck operators**
- income from cross-border trucking, Canada-U.S. Tax Treaty:Art. VIII:4
 - income of, earned in a province, Reg. 2604
 - income of corporation in a province, Reg. 409
- Truss, as medical expense**, 118.2(2)(i)
- Trust (or estate)**, 104–108
- 21-year deemed disposition rule, 104(4), (5), (5.3)–(5.8)
 - • payment of tax in instalments, 159(6.1)
 - accumulating income of
 - • deduction for amounts included in preferred beneficiary’s income, 104(12)
 - • defined, 108(1)
 - • election to include in preferred beneficiary’s income, 104(14), Reg. 2800
 - additional units issued in payment, 107(2.11), (2.12)
 - agent not included, 104(1)
 - allocation of capital and income to different beneficiaries, 104(7.1), (7.2)
 - alter ego, *see* Alter ego trust
 - amateur athlete, for, *see* Amateur athlete trust
 - amount deemed not paid to beneficiary, 104(13.1), (13.2)
 - amount payable in taxation year, 104(24)
 - annuity contract, interest in, 12.2
 - Australia, resident in, deemed to be corporation for certain purposes, 93.3
 - balance-due day of, 248(1)“balance-due day”(a)
 - bare, *see* Bare trust
 - “beneficially interested” in, meaning of, 248(25)
 - beneficiary, *see* Beneficiary: trust of
 - benefits from, income, 12(1)(m), 105
 - business investment loss, deduction from, 39(10)
 - capital cost allowance, determination or designation of, 104(16) [repealed]
 - capital gains of
 - • allocated to beneficiary, 104(21)–(21.7)
 - • net taxable, 104(21.3)
 - capital interest in
 - • acquisition of
 - • • reduction of loss on property disposed of, 107(6)
 - • additions to, 53(1)(d.1)
 - • adjusted cost base
 - • • computation of, 53(1)(d.1)
 - • • deductions from, 53(2)(b.1), 53(2)(h)
 - • cost amount of, 108(1)
 - • cost of, 107(1.1)

Index

- Trust (or estate) (*cont'd*)
- defined, 108(1), 248(1)
 - disposition of, 107(1)
 - disposition of, on distribution by trust, 248(1)“disposition”(d), (h)
 - distribution in satisfaction of, 107(2)–(5), ITAR 36
 - effect of payment out of trust’s income or gains, 43(3)
 - fair market value of, 107.4(4)
 - partial disposition of, 43
 - rollover to another trust, 107.4(3)(j)
 - ceasing to act as agent of beneficiary, 248(1)“disposition”(b)(v)
 - commercial, *see* personal (*below*); Unit trust
 - created by will of taxpayer, meaning of, 248(9.1)
 - cumulative Canadian exploration expense
 - reduced by investment tax credit, 127(12.3)
 - customer/client compensation, for, exempt, 149(1)(w)
 - death benefits, flow-through to beneficiary, 104(28)
 - deduction in computing income, 104(6), 108(5)
 - deemed disposition of property, 104(4)
 - deemed proceeds and cost, 104(5)
 - deferred profit sharing plan, under, 147(7)
 - exempt, 149(1)(s)
 - defined
 - for non-resident trust rules, 104(1), 248(1)
 - for registered education plans, 146.1(1)
 - for specific trust rules, 108(1)
 - generally, 104(1), 248(1)
 - in Quebec, 248(3)
 - definitions, 108
 - designated beneficiary, defined, 210(1)
 - designated income, tax on, 210–210.3
 - deemed paid by beneficiary, 210.2(3)
 - designated income, defined, 210(1)
 - designations re partnerships, 210.2(4)
 - returns, 210.2(5)
 - tax payable, 210.2(1)
 - trustee’s liability, 210.2(6)
 - trusts excepted, 210(2)
 - where no designated beneficiaries, 210.3
 - designation of foreign income to beneficiaries, 104(22)–(22.4)
 - disposition of interest in, 106, 107
 - disposition of property to, capital loss nil, 40(2)(g)(iv)
 - distribution of property by, in satisfaction of capital interest, 107(2)–(5)
 - before death, anti-avoidance rule, 104(4)(a.2)
 - election not to distribute gains, 107(2.11), (2.12)
 - in settlement of debt, 107(4)
 - no capital loss on beneficiary’s capital interest, 43(3)
 - non-resident beneficiary, to, 107(5)
 - instalment obligation not increased, 107(5.1)
 - security to postpone payment of tax, 220(4.6)–(4.63)
 - distribution, tax on, *see* SIFT trust
 - dividend received by, allocation to beneficiary, 104(19), (20)
 - division of property among other trusts, 107.4(2)
 - election by, *see* Election(s); trust
 - eligible taxable capital gains, defined, 108(1)
 - employee, *see* Employee trust
 - employee life and health trust, 144.1, *see also* Employee life and health trust
 - employees’ charity
 - receipts, Reg. 3502
 - employees profit sharing plan, under, 144(2)
 - exempt, 149(1)(p)
 - environmental, *see* Qualifying environmental trust
 - exclusions for purposes of certain sections, 108(1)“trust”
 - financial institution, 142.2(1)“financial institution”(b)
 - foreign, *see* non-resident (*below*)
 - foreign immigration, *see* Immigration trust
 - foreign tax credit for beneficiaries, 104(22)–(22.4)
 - foreign tax credit re former resident, 126(2.22)
 - Hepatitis C, income of not taxable, 81(1)(g.3)
 - immigration, *see* Immigration trust
 - income interest in
 - cost of, 106(1.1)
 - deduction for, 106(1)
 - defined, 108(1)
 - disposition of, 106(2)
 - proceeds, 106(3)
 - personal trust, in, 108(1)“income interest”
 - “income” of, 108(3)
 - income of beneficiaries, 108(5)
 - income paid to non-resident, 212(1)(c), 212(11)
 - exemption, 212(9), (10)
 - income payable to beneficiary, deduction for, 104(6)
 - non-resident beneficiary, 104(7)
 - income trust, *see* Specified investment flow-through
 - India, resident in, deemed to be corporation for certain purposes, 93.3
 - Indian Residential Schools settlement, *see* Indian Residential Schools Settlement trust
 - information return, Reg. 204
 - early disclosure for public trust, Reg. 204.1
 - *inter vivos*
 - deemed creation, re non-profit association, 149(5)
 - defined, 108(1)
 - personal tax credits not available, 122(1.1)
 - tax payable by, 122
 - interest in, *see also* “beneficially interested” in (*above*)
 - adjusted cost base
 - additions to, 53(1)(d.1), (d.2), (l)
 - deductions from, 53(2)(b.1), (h), (i), (j), (q)
 - recomputation of, 53(4)–(6)
 - interest income of, 12(3)
 - investment tax credit, designation of, 127(7)
 - joint partner, *see* Joint spousal or common-law partner trust
 - joint spousal, *see* Joint spousal or common-law partner trust
 - life insurance policy, interest in, 12.2
 - loss property held by
 - reduction of loss on disposition by person acquiring capital interest, 107(6)
 - maintenance expenses, 105(2)
 - master, exempt from tax, 149(1)(o.4)
 - mine reclamation, *see* Qualifying environmental trust
 - minor, for, 104(18)
 - transfer of property to, 74.3, 74.5(9), (10)
 - multiple
 - basic exemption re minimum tax, 127.53(2), (3)
 - grouped together as one trust, 104(2)
 - mutual fund, *see* Mutual fund trust
 - non-discretionary, defined, 17(15)
 - non-resident, 94(1)“connected contributor”(a)
 - Canadian beneficiary liable for trust’s tax, 94(3)(d)(i)
 - Canadian contributor liable for trust’s tax, 94(3)(d)(i)
 - capital interest in cost base, deductions from, 53(2)(i)
 - commercial trust exemption, 94(1)“exempt foreign trust”(h)
 - deemed resident in Canada, 94(3)(a); *Income Tax Conventions Interpretation Act* s. 4.3
 - rental income from Canadian property, 216(4.1)
 - distribution from, disclosure, 233.5
 - information return, 233.2, 233.5
 - no deduction for income paid to non-resident or exempt beneficiary, 104(7)
 - reporting requirements, 233.2, 233.5
 - transfer of property to
 - constitutes disposition, 248(1)“disposition”(e)(iii), 248(25.1)
 - disclosure, 233.2

Index

- Trust (or estate) (*cont'd*)
- trust becoming, withholding tax triggered, 214(3)(f)(i)(C)
 - non-resident beneficiaries, 104(7)
 - non-residents, for
 - payments to, 212(1)(c)
 - non-taxable dividends received by, designation re, 104(20)
 - option to acquire units in, 49(1)(c)
 - payment of duties and taxes, non-disqualification, 108(4)
 - pension benefits, flow-through of, 104(27)
 - pension fund or plan
 - exemption, 149(1)(o)
 - personal, *see* Personal trust
 - personal-use property of, 46(4)
 - pooled fund, *see* Pooled fund trust
 - post-1971 partner, *see* Post-1971 spousal or common-law partner trust
 - preferred beneficiary
 - defined, 108(1)
 - income of, 104(14), (15)
 - prescribed, Reg. 4800.1
 - capital interest in, defined, 108(1)“capital interest”(a)
 - distribution of property to beneficiary, 107(2), (4.1)
 - principal residence
 - disposed of to taxpayer, 40(7)
 - distribution by spouse trust, 107(2.01)
 - property transferred to
 - income imputed to transferor, 75(2)
 - income not imputed to transferor, 75(3)
 - proportional holdings in property of, 259
 - “qualified” defined, 259(3)
 - qualified investments, *see* Qualified investment
 - qualifying disposition, rollover, 107.4
 - qualifying environmental, *see* Qualifying environmental trust
 - reference to trustee, executor etc., 104(1)
 - registered education savings plan, under, 146.1(1)“trust”, 146.1(5)
 - exempt, 149(1)(u)
 - registered investment, 204.4–204.7
 - registered retirement income fund, exempt, 149(1)(x)
 - registered retirement savings plan, under, 146(4)
 - exempt, 149(1)(r)
 - registered supplementary unemployment benefit plan, exempt, 149(1)(q)
 - reinsurance, *see* Reinsurance trust
 - related segregated fund, Reg. 6100
 - reporting of beneficiaries, trustees, settlors and protectors starting 2022, Reg. 204.2(1)(a)
 - residence of, deemed, 250(6.1)
 - resource property
 - rules, 104(5.2)
 - retirement compensation arrangement, *see* Retirement compensation arrangement
 - return to be filed, 150(1)(c)
 - right of use or habitation (Quebec) deemed to be, 248(3)
 - rollover of property on transfer to other trust, 107.4
 - rollover to another trust, 248(1)“disposition”(e), (f)
 - scientific research tax credit, 127.3(3)
 - segregated fund, Reg. 6100
 - self, for, *see* Alter ego trust
 - self-benefit, *see* Alter ego trust
 - settlor, defined, 108(1)
 - small business investment, Reg. 5103
 - spouse, for, 70(6)(a), 73(1.01)(c), 104(4)(a), *see also* Joint spousal or common-law partner trust; Post-1971 spousal or common-law partner trust
 - deduction from taxable income of, 110.6(12)
 - deemed disposition, 104(4)
 - distribution by, in satisfaction of capital interest, 107(4)
 - double taxation relief, Canada-U.S. Tax Treaty:Art. XXVI:3(g)
 - family farm corporation transferred from, to children, 70(9.3), (9.31)
 - family fishing corporation transferred from, to children, 70(9.3), (9.31)
 - farm or fishing property transferred from, to children, 70(9.1), (9.11)
 - farm property transferred from, to children, 70(9.1)
 - how created, 70(6), 70(7), 73(1.01)
 - indefeasible vesting of property in, 70(6)
 - not disqualified by certain payments, 108(4)
 - principal residence
 - disposed of to, 40(4)
 - distribution by, 107(2.01)
 - exemption, 54“principal residence”(c.1)(iii.1)(A)
 - property of, 40(5)
 - property transferred to, *inter vivos*, 73(1)
 - capital cost, and deemed allowance, 73(2)
 - reserves allowed to, for year of taxpayer’s death, 72(2)
 - special rules applicable, 70(7), (8)
 - together with self, *see* Alter ego trust
 - transfer of property to, 74.3, 74.5(9), (10)
 - transfer or distribution to, on death of taxpayer, 70(6)
 - value of property acquired, 70(6), 73
 - status of, Reg. Part XLVIII
 - substitution (Quebec) deemed to be, 248(3)
 - supplementary unemployment benefit plan, under, 145(2)
 - tax paid under Part XII.2
 - credit for, included in beneficiary’s income, 104(31)
 - deduction for, 104(30)
 - tax re property held by, 207.1
 - taxable dividends received by
 - designation re, 104(19)
 - payable to non-resident beneficiary, 82(1)(e)
 - taxed as individual, 104(2)
 - testamentary, *see* Graduated rate estate for most rules starting 2016
 - defined, 108(1)
 - transfers to, for minor or spouse, 74.5(9), (10)
 - trustee of, *see* Trustee
 - unit, *see* Unit trust
 - usufruct (Quebec) deemed to be, 248(3)
 - vacation pay, exempt, 149(1)(y)
 - voting, Reg. 4800.1(c)
 - windup of, deemed resident, 250(6.1)

Trust account number

 - defined, 248(1)
 - disclosure of, offence, 239(2.3)
 - failure to provide, penalty, 162(6)
 - information return requiring, reasonable effort required to obtain, 237(2)(a)
 - must be provided in return and to person required to report it, 237(1.1)

Trust and loan corporations

 - taxable income earned in a province, Reg. 405

Trust company, *see also* Financial institution

 - defined, for FAPI purposes, 95(1)

Trust loss trading, 251.2

Trustee, *see also* Legal representative; Trust (or estate)

 - change of, whether change in control of corp owned by trust, 256(7)(i)
 - deemed to be legal representative, 248(1)“legal representative”
 - in bankruptcy, *see* Bankruptcy: trustee in
 - information return, Reg. 204
 - liable for Part X tax, 198(3)
 - liable for Part XII.2 tax, 210.2(6)
 - obligations of, 159
 - public, disposition of Canadian securities, 39(5)(c)

- Trustee (*cont'd*)
- reported to CRA starting 2022, Reg. 204.2(1)(a)
 - return required of, 150(3)
 - • penalty for failure to file, 162(3)
 - school board, expense allowance exempt, 81(3) [before 2019]
 - school supplies, 122.9
 - shares held by, for employee, 7(2)
 - shares purchased by, for employees of corporation, 7(6)
 - teacher school supplies, 122.9
 - withholding tax, liability for, 227(5), (5.1)(a)
- Tuition fees**
- adult basic education, *see* Adult basic education
 - credit for, 118.5, 122.91
 - • ancillary fees, 118.5(3)
 - • commuter's, 118.5(1)(c)
 - • deemed residents, 118.5(2)
 - • in Canada, 118.5(1)(a)
 - • outside Canada, 118.5(1)(b)
 - • unused
 - • • transfer to spouse, 118.8
 - • • transfer to supporting person, 118.9
 - T2202 information return must be issued to student, Reg. 203
- Tuition, textbook and education tax credits transferred**
- defined, 118.81
- Tunnel, capital cost allowance**, Reg. Sch. II:Cl. 1(j)
- Turbine**, *see* Combustion turbine
- Tutoring service**
- disability supports deduction, 64(a)A(ii)(H)
 - medical expense credit, 118.2(2)(1.91)
- Twentieth qualifying period (etc.)**
- defined, for CEWS, 125.7(1)“qualifying period”
- Twenty-one years**
- deemed realization of trust gains, 104(4), (5), (5.3)–(5.8)
- Twinning arrangement**
- defined, for Canadian film/video credit, Reg. 1106(1)
- Two-year rolling start rule**
- when property available for use, 13(27)(b), 13(28)(c), 13(29)
- Tyco-Pentair spinoff**, Reg. 5600(g)
- U**
- UCC**, *see* Undepreciated capital cost
- UHTA**, *see* Underused Housing Tax Act
- UI**, *see* Unemployment insurance
- UN**, *see* United Nations and its agencies
- US**, *see* United States
- US Steel**
- pension underfunding trust, Reg. 6802(i), 8502(b)(v.1)
- USD (US Dollars)**
- defined, for Common Reporting Standard, 270(1)
- Ultimate funder**
- defined, for back-to-back shareholder loan rules, 15(2.192), 212(3.8)
 - election by, 212(3.22)
- Ultimate licensor**
- defined, for non-resident withholding tax back-to-back rules, 212(3.94)
- Ultimate parent**
- defined, for alternative interest-deduction restrictions, 18.21(1), (4)
 - entity, *see* Ultimate parent entity
- Ultimate parent entity**
- defined, for country-by-country reporting, 233.8(1)
- Unaffiliated publicly traded liability**
- defined, for SIFT trust definition, 122.1(1)
- Unamortized bond premium**
- reserve for, *see* Reserve: unamortized bond premium
- Unanticipated Surpluses Act**, *see* Budget surplus
- Uncertain tax treatment**, 237.5
- information return required, 237.5(2)
 - • filing deadline, 237.5(3)
 - • penalty for failure to file, 237.3(5)
 - • reassessment deadline 3 years after filed, 152(4)(b.7)
- Uncle**, *see also* Niece/nephew
- defined, 252(2)(e)
 - dependent, 118(6)(b)
 - great-uncle defined, 252(2)(f)
- Undepreciated capital cost**, *see also* Capital cost; Depreciable property
- defined, 13(21)
 - exceeding fair market value at time of transfer, 13(21.2), 20(16)
 - reduction on debt forgiveness, 80(5)(b)
 - transferred property, 13(5)
- Underground piping**
- well for installation of, Reg. 1219(1)(f), Sch. II:Cl. 43.1(d), Sch. II:Cl. 43.2(b)
- Underlying foreign tax applicable (of foreign affiliate)**
- defined, Reg. 5907(1)
- Underlying foreign tax (of foreign affiliate)**
- defined, Reg. 5907(1)
- Underlying payment (securities lending arrangement)**
- defined, for securities lending arrangement, 260(1)
 - on qualified security, 260(5), (5.1)
 - • no deduction, 18(1)(w)
- Underlying return**
- defined, for hybrid mismatch arrangement rules, 18.4(14)(d)(i)
- Underpayment amount**
- defined, for corporate interest offset, 161.1(1)
- Undertaking future obligations**
- deduction for, 20(24)
- Underused Housing Tax Act**, 18(1)(t) [Notes]
- compliance required before s. 116 certificate issued, 116(8)
 - interest paid under, non-deductible, 18(1)(t)
 - reappropriation of income tax payment to amount payable under, 221.2(2)
 - returns must be filed for income tax refund to be paid, 164(2.01)
- Undivided interest**
- in property transferred by tax debtor, fair market value, 160(3.1)
- Undue benefit (conferred by charity on any person)**
- defined, 188.1(5)
 - penalty, 188.1(4)
- Undue delay**, *see* Delay
- Undue hardship**
- reduction in security to be posted on emigration, 220(4.7), (4.71)
 - reduction in source withholdings, 153(1.1)
 - • payments to actors, 212(5.3)
 - refund instalments, 164(1.51)–(1.53)
- Unearned commissions**
- reserve for, 32
- Unemployment insurance**, *see* Employment insurance
- Unenforceable debt**, *see* Statute-barred debt, deemed settled
- Ungulates, grazing**, 80.3(1)“breeding animals”
- Uniforms, capital cost allowance**, Reg. Sch. II:Cl. 12(i)
- Unincorporated association or organization**, *see* Non-profit organization
- Union**
- election by, re foreign pension plan, Reg. 6804(3)
 - exemption, 149(1)(k)
 - information return required, 149.01 [repealed]

Index

Union (*cont'd*)

- locals and branches deemed to be one employer for pension purposes, 252.1
- membership dues
- • deduction for, 8(1)(i)(iv), (v)
- • where not deductible, 8(5)
- strike pay taxed or exempt? no legislative reference
- venture capital, *see* Labour-sponsored venture capital corporation (LSVCC)

Unit

- mutual fund trust, *see* Mutual fund trust: unit of
- trust, *see* Unit trust

Unit buybacks, *see* Stock buyback tax

Unit trust, *see also* Mutual fund trust

- adjusted cost base of unit, 53(1)(d.2), 53(2)(h), (j)
- annuity contract, interest in, 12.2
- “block of units” defined, Reg. 4803(1)
- defined, 108(2), 248(1)
- excluded from various trust rules, 108(1)“trust”(f)
- expenses of issuing or selling, 20(1)(e)
- issuance of unit, whether deductible to trust, 143.3(4)
- life insurance policy, interest in, 12.2
- non-resident
- • adjusted cost base of unit, 53(2)(j)

United Kingdom, *see also* Foreign government

- currency of, use as functional currency, 261(1)“qualifying currency”(c)
- defined, *Interpretation Act* 35(1)
- stock exchange recognized, Reg. 3201(n)
- Tax Convention, *see* Table of Contents
- universities, gifts to, Reg. Sch. VIII, s. 2
- war pension exempt, 81(1)(e)

United Mexican States, *see* Mexico

United Nations and its agencies

- agency of, excluded from non-resident trust rules, 94(1)“exempt foreign trust”(c)(i)
- donation to, 149.1(1)“qualified donee”(d)
- • by corporation, deduction, 110.1(1)(a)
- • by individual, tax credit, 118.1(1)“total charitable gifts”
- employment income from
- • deduction, 110(1)(f)(iii)

United States, *see also* Foreign government; Non-resident

- absorptive merger, 87(8.2)
- artiste or athlete, Canada-U.S. Tax Treaty:Art. XVI
- citizens, reporting obligations to IRS, 233.3(3) (Notes)
- collection of Canadian tax by IRS, Canada-U.S. Tax Treaty:Art. XXVI A
- commuter to, *see* Commuter to United States
- corporate spin-off, *see* Foreign spin-off
- currency of, use as functional currency, 261(1)“qualifying currency”(a)
- defined, 19(5), *Interpretation Act* s. 35(1)
- • for treaty purposes, Canada-U.S. Tax Treaty:Art. III:1(b)
- dividends, Canada-U.S. Tax Treaty:Art. X
- donations to charities in, Canada-U.S. Tax Treaty:Art. XXI:7; 118.1(9)
- estate taxes, Canada-U.S. Tax Treaty:Art. XXIX-B
- federal taxpayer identifying number, penalty for failure to provide, 162(6)
- franchise payment to resident of, Canada-U.S. Tax Treaty:Art. XII:3(c)
- gambling losses in, Canada-U.S. Tax Treaty:Art. XXII:3
- global intangible low-taxed income (GILTI)
- • application to US citizens in Canada, 128.1(1) (Notes)
- • effect on hybrid mismatch rules, 18.4(1)“specified minimum tax regime”(a)
- government, employees of, Canada-U.S. Tax Treaty:Art. XIX, XXVIII
- green card holder, Canada-U.S. Tax Treaty:Art. IV:1

- Individual Retirement Account, *see* Foreign retirement arrangement
- interest, Canada-U.S. Tax Treaty:Art. X
- Internal Revenue Service, *see* Internal Revenue Service (U.S.)
- limitation on treaty benefits, Canada-U.S. Tax Treaty:Art. XXIX-A
- limited liability company, *see* Limited liability company
- moving to, Canada-U.S. Tax Treaty:Art. XIII:6
- Nature Conservancy, prescribed donee, Reg. 3504
- newspaper or periodical printed in, 19(1)(b)
- pensions, Canada-U.S. Tax Treaty:Art. XVIII
- • pension credit under tax treaty, Reg. 8308.1(2.1)
- RRSP deferral, Canada-U.S. Tax Treaty:Art. XVIII:7
- *Railroad Retirement Act* Tier 1 benefits, Canada-U.S. Tax Treaty:Art. XVIII:5
- Real Estate Investment Trust, {Canada-U.S. Tax Treaty:Art. X:7(c)}
- Real Estate Mortgage Investment Conduit, Canada-U.S. Tax Treaty:Art. XI:9
- real property interest, Canada-U.S. Tax Treaty:Art. XVIII:3
- Regulated Investment Company, *see* Regulated Investment Company (U.S.)
- royalties paid to resident of, Canada-U.S. Tax Treaty:Art. XII
- S corporation, Canada-U.S. Tax Treaty:Art. XXIX:5
- social security benefits, Canada-U.S. Tax Treaty:Art. XVIII:5
- • grandfathering where received since before 1996, 110(1)(h)
- social security taxes, Canada-U.S. Tax Treaty:Art. XXIV:2(a)(ii)
- • credit against Canadian tax, 122.7
- state income tax, 126(5), (7)
- stock exchanges recognized, Reg. 3201(o)
- stock options, Canada-U.S. Tax Treaty:Fifth Protocol (2007), Annex B, para. 6
- Tax Convention, *see* Table of Contents
- university, gift to, Reg. 3503, Sch. VIII, Canada-U.S. Tax Treaty:Art. XXI:7

United States tax

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

Unitized oil or gas field in Canada

- Canadian oil and gas property expense, 66(12.5)
- exploration and development expenses, 66(12.2), (12.3)

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

- disclosure of information by CRA to administer, 241(4)(d)(vii.4)
- does not affect Canada Child Benefit, 122.6“adjusted income”
- does not affect GST Credit, 122.5(1)“adjusted income”
- does not create OAS clawback, 180.2(1)“adjusted income”
- information return required, Reg. 200(6)
- no attribution if transferred to child, 74.1(2)
- paid for earlier years, averaging of income, 56(8)
- repayment of, deductible, 60(y)
- single parent, designation to include UCCB in child’s income, 56(6.1)
- • effect of designation, 56(6)(c)
- taxable, 56(6)
- text of Act, 56(6) (Notes)

University

- fees, *see* Tuition fees
- information return for tuition or scholarship, Reg. 203
- outside Canada, prescribed, Reg. 3503, Reg. Sch. VIII
- • donation to, 149.1(1)“qualified donee”(a)(iv)
- • • by corporation, deduction, 110.1(1)(a)
- • • by individual, tax credit, 118.1(1)“total charitable gifts”
- trust for, exempt from non-resident trust rules, 94(1)“exempt foreign trust”(c)(ii)
- U.S., *see* United States: university

Unlimited liability company, *see* Nova Scotia: unlimited liability company

Unpaid amount

- general rules, 78
- investment tax credit limitation, 127(26), 127.44(11)
- tax shelter investment, 143.2(1)“limited-recourse amount”, 143.2(6)

Unpaid claims reserve, *see* Insurance corporation: reserve for unpaid claims

Unrealized proceeds of disposition, 40(1)(a)(iii)

Unreasonable amount

- expense, no deduction for, 67
- • paid by non-resident, 247
- • paid to non-resident, 247

Unrecognized loss

- debt forgiveness rules
- • defined, 80(1)
- • use of to limit income inclusion, 80(13)D(a)(i)
- straddle transaction rules
- • defined, 18(17)

Unrecognized profit (straddle transaction rules)

- defined, 18(17)

Unrelated group, defined, 251(4)

Unstapling of securities, anti-avoidance, 12.6

Unused Canadian property mutual fund loss

- defined, 218.3(1)

Unused foreign tax credit, *see* Foreign tax credit: unused

Unused non-deductible PRPP room

- defined, 147.5(1)
- increases unused RRSP deduction room, 146(1)“unused RRSP deduction room”(b)D(iv)

Unused portion of a beneficiary’s exempt capital gains balance

- defined, 144(1)

Unused RRSP deduction room

- defined, 146(1), 248(1)
- effect on excess RRSP contributions, 204.2(1.1)(b)A
- effect on RRSP deduction limit, 146(1)“RRSP deduction limit”A

Unused surtax credit

- defined, 181.1(6), 190.1(5)
- reduces Part VI tax, 190.1(6)

Unused TFSA contribution room

- defined, 207.01(1)
- • contributions over, 207.01(1)“excess TFSA amount”

Unused tuition, textbook and education tax credits

- defined, 118.61(1)

Upgrading development phase (of oil sands project)

- defined, Reg. 1104(2)

Upper-tier affiliate

- defined, 95(1)“participating percentage”(b)(i)(B), Reg. 5905(13)(a)(ii)

Upstream deposit (of eligible Canadian bank)

- credit to offset Part XIII withholding tax on, 125.21
- defined, for FAPI of banks, 90(15), 95(2.43)
- excluded from upstream loan income inclusion, 90(8)(d)
- treatment of, for upstream loan rules, 90(8.1)

Upstream loans

- foreign currency adjustment set-off on repayment until 2016, 39(2.1), 95(2)(g.04)
- • transitional setoff election, 39(2.3)
- from foreign affiliate, included in income, 90(6)–(15)
- continuity on reorganizations, 90(6.1), (6.11)

Uranium, *see* Critical mineral

Use, right of (Quebec)

- deemed to be trust, 248(3)

Use of property, *see* Production or use

Usufruct (Quebec)

- deemed to be trust, 248(3)
- defined
- • *Quebec Civil Code*, art. 1120–1171

Utensils, *see* Kitchen utensils

Utilities

- service connection, deduction, 20(1)(ee)

V

V-day, *see* Valuation day

VDP, *see* Voluntary disclosure program

VPLA, *see* Variable payment life annuity

VPLA benefits

- allowed for pooled registered pension plan, 147.5(5)(a)
- allowed for registered pension plan, Reg. 8506(1)(e.2)

VPLA fund

- benefits form part of MPP of pension plan, 147.1(1)“money purchase provision”(b)(ii)
- defined, Reg. 8506(13)
- variable payment life annuity from, Reg. 8506(1)(e.2)

Vacant home tax, *see* *Underused Housing Tax Act*

Vacant land

- limitation on deductions, 18(2)–(3.7)

Vacation pay trust

- exemption, 149(1)(y)

Validity of *Income Tax Act*, 2(1) (Notes)

Valuation activity

- defined, for third-party penalty, 163.2(1)

Valuation costs

- added to cost base of property, 53(1)(n)

Valuation day

- defined, ITAR 24
- fair market value on, election by individual to use, Reg. 4700
- property held since before
- • capital property, ITAR 26(3)
- • depreciable property, ITAR 20(1)
- publicly-traded shares and securities on, Reg. Sch. VII

Valuation of inventory, *see* Inventory: valuation of

Value, *see also* Fair market value

- defined, for insurers regulations, Reg. 2400(1)

Value-added tax, *see* Goods and services tax (GST)

Van

- deemed not to be automobile, 248(1)“automobile”(e)
- wheelchair access, medical expense credit, 118.2(2)(l.7)

Vancouver

- international banking centre until 2013, 33.1(3)
- 2010 Olympics, *see* Olympic Winter Games 2010

Vancouver Stock Exchange, *see also* TSX

- prescribed stock exchange, 262

Vanadium, *see* Critical mineral

Variable benefits

- pooled registered pension plan, 147.5(5)(a)
- registered pension plan, Reg. 8506(1)(e.1)
- • non-payment of minimum amount, Reg. 8506(4)–(6)

Variable payment life annuity

- allowed as pooled registered pension plan benefit, 147.5(5)(a)
- allowed as registered pension plan benefit, Reg. 8506(1)(e.2)
- defined, Reg. 8506(1)(e.2)
- VPLA fund, Reg. 8506(13)

Variation of trust, effect of, 108(6)

Vatican City, *see also* Foreign government

- universities, gifts to, Reg. Sch. VIII, s. 7

Vats, capital cost allowance, Reg. Sch. II:Cl. 8

Veekans Poultry case overruled, 67.6

Index

- Vehicle**, *see also* Automobile; Motor vehicle; Passenger vehicle
- cost over \$100,000, *see* Luxury Items Tax
 - device to permit person with mobility impairment to drive
 - • medical expense, Reg. 5700(n)
 - mechanic, *see* Apprentice: mechanic
- Vehicle charging station**
- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xvii)
- Vehicle modifications benefit**
- paid to Canadian Forces member or veteran, exempt, 81(1)(d.1)(vii)(C)
- Ventilation expense**, *see* Air quality improvement credit
- Venture capital corporation, prescribed**, *see also* Labour-sponsored venture capital corporation (LSVCC)
- assistance, Reg. Part LXVII
 - defined, Reg. 6700
 - disposition of shares of
 - • capital loss, 40(2)(i)
 - exempt from Part IV tax, 186.2
 - in definition of Canadian-controlled private corporation, 125(7)
 - labour-sponsored, defined, Reg. 6701
 - may control private corporation, 89(1)“private corporation”
 - prescribed assistance, Reg. 6702
 - shares of
 - • prescribed assistance, deduction from cost base, 53(2)(k)(i)(C)
- Verification**, *see* Audit
- Vertical amalgamation**
- carryback of losses, 87(2.11)
 - deemed cost of capital properties, 87(11)(b)
 - deemed proceeds from subsidiary’s shares, 87(11)(a)
- Vertical (short-form) amalgamation**, *see also* Amalgamation
- carryback of losses, 87(2.11)
- Vessel**
- capital cost allowance, Reg. 1100(1)(v), Reg. Sch. II:Cl. 7
 - • separate classes, Reg. 1101(2)–(2b)
 - • • exclusion where structured financing facility, Reg. 1101(2c), Sch. II:Cl. 41(b)
 - certified
 - • capital cost allowance, Reg. 1100(1)(v)
 - conversion cost deemed separate class, 13(14), (17)
 - defined, 13(21)
 - deposit under *Canadian Vessel Construction Assistance Act*
 - • disposition of, 13(19), (20)
 - disposition of, election, 13(16)
 - fishing, additional capital cost allowance, Reg. 1100(1)(i)
 - quadrennial survey, reserve for, 20(1)(o), Reg. 3600
 - reassessment in certain cases, 13(18)
 - transfer of, under, *Canadian Vessel Construction Assistance Act*
 - • recapture of depreciation, 13(13)
- “Vested indefeasibly”**
- meaning of, 248(9.2)
- Vesting year**
- defined, for stock option limit rules, 110(0.1)
- Veterans’ benefits, exempt**, 81(1)(d.2)
- Veterans Health Care Regulations**
- payments exempt, 81(1)(d.1)(v)
- Veterans’ pensions**, *see also* Canadian Forces and veterans
- exempt, 81(1)(d), (d.1), (e)
- Veterans Well-Being Act**
- certain payments exempt, 81(1)(d.1), (d.2)
 - certain payments taxable, 6(1)(f.1)
 - disclosure of taxpayer information for administration of, 241(4)(d)(viii)
 - income replacement benefit, whether taxable, 56(1)(a)(viii)
 - retirement income security benefits under
 - • eligible for pension income credit, 118(3)B(b)(ii)
 - • eligible for pension income splitting, 60.03(1)“eligible pension income”(c)
- Veterinarian**, *see* Professional practice
- VIA Rail**, *see also* Railway
- subject to tax, 27(2), Reg. 7100
- ViaVoice software**
- disability supports deduction, 64(a)A(ii)(G)
 - medical expense credit, 118.2(2)(1.42)
- Vibratory signalling device for the hearing-impaired**
- medical expense credit, Reg. 5700(q.1)
- Victims of crime**
- compensation payments exempt, 81(1)(q), Reg. 6501
- Video game arcade relief (COVID)**, Reg. 8901.1(2)(b)(ix)(A)(IV), (b)(xv), *see also* Qualifying tourism or hospitality entity
- Video games**
- capital cost allowance, Reg. Sch. II:Cl. 16(f)
- Video laser-disk**, *see* Digital video disk (DVD)
- Video tapes**
- film or video production services credit, 125.5
- Visa Inc.**
- prescribed payment card corporation share, Reg. 9002.1(a)(iii)
- Viscosity**
- hydrocarbons, determination of, Reg. 1107
- Visitor to Canada**
- 183 days, deemed resident, 250(1)(a)
- Visual signalling device for the hearing-impaired**
- medical expense credit, Reg. 5700(q.1)
- Vitamin B12, as medical expense**, 118.2(2)(k)
- Voice recognition software**
- disability supports deduction, 64(a)A(ii)(G)
 - medical expense credit, 118.2(2)(1.42)
- Voluntary disclosure program**, 220(3.1) (Notes)
- Volunteer**
- emergency worker
 - • exemption from employment income, 81(4)
 - firefighter, *see* Firefighter: volunteer
 - search and rescue, *see* Search-and-rescue volunteer
- Volunteer business exemption**
- charities, 149.1(1)“related business”
- Volunteer firefighter**, *see* Firefighter
- Voting trust**, Reg. 4800.1(c)
- ## W
- WADA**, *see* World Anti-Doping Agency
- WCB payment**, *see* Workers’ compensation payment
- WEBs**
- qualified investments for deferred income plans, Reg. 4900(1) (Notes)
- WITB**, *see* Working Income Tax Benefit
- WSIB payment**, *see* Workers’ compensation payment
- Wage Earner Protection Act**
- benefit under
 - • treated as employment income
 - • • for Canada Employment Credit, 118(10)B(b)
 - • • for Canada Workers Benefit, 122.7(1)“working income”(b)
 - • • for moving expenses, 62(1)(c)(i)
 - • • for RRSP earned income, 146(1)“earned income”(b)
 - • • for refundable medical expense supplement, 122.51(1)“eligible individual”(c)(iii)
 - • taxable, 56(1)(r)(v)
 - • • to non-resident as income earned in Canada, 115(1)(a)(iii.21)
- Wage measure**
- defined, 147.1(1)

- Wage measure (*cont'd*)
- used in calculating “average wage”, 147.1(1)
- Wage subsidy**, *see* Canada Emergency Wage Subsidy (CEWS)
- Wagering losses**, Canada-U.S. Tax Treaty:Art. XXII:3
- Wages**, *see* Salary
- Wagon, capital cost allowance**, Reg. Sch. II:Cl. 10(d)
- Waiver**
- penalty or interest, of, by Minister, 220(3.1)
 - pension plan conditions, by Minister, 147.1(18)(a), (k)
 - RESP age requirements, where beneficiary disabled, 146.1(2.2)
 - reassessment period, of, by taxpayer, 152(4)(a)(ii), 152(4)(c), 152(4.1), (5)
 - requirement to file form or document, of, by Minister, 220(2.1)
 - retention of document or thing seized, by Minister, 231.3(6)
 - right to appeal, binding, 169(2.2)
 - right to object, binding, 165(1.2), 169(2.2)
 - solicitor-client privilege, of, by client, 232(14)
 - tax on excess EPSP amount, 207.8(3)
 - tax on FHSA, RDSP, RESP, RRIF, RRSF or TFSA acquiring prohibited or non-qualified investment or extending advantage, 207.06(2)
 - tax on overcontribution to deferred income plan, by Minister, 204.1(4)
 - tax on overcontribution to FHSA, 207.06(3)
 - tax on overcontribution to RESP, 204.91(2)
 - tax on overcontribution to TFSA, 207.06(1)
- Walking aids**
- medical expense, Reg. 5700(i)
- War savings certificate, income exempt**, 81(1)(b)
- War service**
- pension payments for, exempt, 81(1)(d), (e)
- War Veterans Allowance Act**
- pension under, exempt, 81(1)(d)
- Warehousing of flow-through expenses**, 66(19)
- Warnock case overruled**, 118.2(2.21)
- Warrant**, *see* Option; Search warrant
- Warranty**
- amount receivable for, on sale of property, 42
 - disposition of property subject to, 42
 - outlays, pursuant to
 - on amalgamation, 87(2)(n)
 - reserve for, not allowed, 20(7)
- Water**
- distribution of, by municipal corporation, exemption, 149(1.2)
- Water distributing equipment**
- capital cost allowance, Reg. Sch. II:Cl. 1(o), Sch. II:Cl. 2(e)
- Water purifier**
- medical expense credit for, Reg. 5700(c.1)
- Water system for mine**
- capital cost allowance, Reg. Sch. II:Cl. 10(l)
- Wave or tidal energy, electricity generation equipment**
- capital cost allowance, Reg. Sch. II:Cl. 43.1(d)(xiv), Sch. II:Cl. 43.2
- Weak currency debt**
- defined, 20.3(1)
 - limit on interest deduction, 20.3(2)
- Wearing apparel for rental**
- capital cost allowance, Reg. Sch. II:Cl. 12(k)
- Webb case (1974) overruled**, 64.1
- Wedding planning or hosting relief (COVID)**, Reg. 8901.1(2)(b)(xx)(B), *see also* Qualifying tourism or hospitality entity
- Weighted Canadian liabilities**
- defined, insurers, Reg. 2400(1)
- Weighted total liabilities**
- defined, insurers, Reg. 2400(1)
- Wel Holdings case overruled**, 244(13.1) [repealed]
- Welder**
- apprenticeship job creation credit, 127(9)“investment tax credit”
- Welfare**, *see* Social assistance payment
- Well**
- for installation of underground piping, Reg. 1219(1)(f), Sch. II:Cl. 43.1(d), Sch. II:Cl. 43.2(b)
- Western Grain Stabilization Act**
- fees paid, deductible, 20(1)(ff)
 - payment received under, income, 12(1)(p)
- Wharf, capital cost allowance**, Reg. Sch. II:Cl. 3, Sch. II:Cl. 6
- for mine, Reg. Sch. II:Cl. 10(l)
- Wheelchair**
- medical expense, 118.2(2)(i)
 - power-operated lift for, Reg. 5700(m)
 - ramp for
 - deduction, 20(1)(qq)
 - medical expense credit, 118.2(2)(l.2)
 - van for use with, medical expense credit, 118.2(2)(l.7)
- Whistleblower payments**, *see* Stop International Tax Evasion Program
- Whole dividend (of foreign affiliate)**
- defined, Reg. 5907(1)
- Wholly-owned corporation**, *see also* Subsidiary: wholly-owned corporation
- defined, for corporate rollover rules, 85(1.3)
- Wife**, *see* Spouse
- Wig, medical expense**, Reg. 5700(a)
- Wild (1245989 Alberta) case overruled**, 245(1)“tax benefit”(c)
- Will**
- gifts by deemed made in year of death, 118.1(5) [before 2016], 118.1(5.1) [after 2016]
 - publicly traded securities, reduced capital gain, 38(a.1)(ii)
 - transfer, release or surrender under, 248(8)
 - trust created by, 248(9.1)
- Wind energy conversion system**
- Canadian renewable and conservation expense, Reg. 1219(4)
- Wind farm project**
- test wind turbine at, *see* Test wind turbine
- Wind turbine**, *see* Test wind turbine
- Winding-up**, *see also* Amalgamation (for specific consequences); Ceasing to carry on business
- acquisition of control because of death, 88(1)(d.3)
 - appropriation of property on, 69(5), 84(2)
 - assets acquired from foreign affiliate on, 80.1(6)
 - bump, 88(1)(c), (d)
 - bump denial rule, 88(1)(c)(vi)
 - Canadian corporation, rules, 88(1), (2)
 - corporation beneficiary under life insurance policy, 89(2)
 - debt, settlement of, 80.01(4), (5)
 - debt forgiveness reserve disallowed, 61.4(c)
 - distribution on, 84(2), (6)
 - farming inventory, 88(1.6)
 - financial institution
 - continuing corporation for mark-to-market rules, 88(1)(h)
 - deemed disposition of mark-to-market property, 88(1)(i)
 - into parent financial institution, 88(1)(a.3)
 - following debt forgiveness, deemed capital gain, 80.03(3)(a)(i)
 - foreign affiliate, 88(3), 95(2)(e)
 - functional currency rules, 261(16)
 - leasing properties, 16.1(4)
 - net capital losses of subsidiary, 88(1.2)
 - 90% or more owned subsidiary, of, 88(1)

Index

- Winding-up (cont'd)**
- limited partnership losses, 88(1.1)
 - net capital losses, 88(1.2)
 - non-capital losses, 88(1.1)
 - parent corporation continuation of, 88(1.5)
 - non-capital losses, treatment by parent, 111(5.4)
 - parent incorporated after subsidiary's year-end
 - computation of income and tax payable, 88(1.3)
 - partnership, *see* Partnership: ceasing to exist
 - period (of revoked charity), *see* Winding-up period
 - pre-1972 capital surplus on hand, 88(2.1)–(2.3)
 - refundable dividend tax on hand, 87(2)(aa), 88(1)(e.2)
 - resource expenses, 66.7(6)
 - specified debt obligation, treatment of, 88(1)(a.3), Reg. 9204(2)
 - subsidiary, of
 - non-capital losses, treatment by parent, 111(5.4)
 - where an insurance corporation, 88(1)(g)
 - trust, of
 - deemed resident throughout year, 250(6.1)
- Winding-up period**
- revoked charity, defined, 188(1.2)
- Windmill, capital cost allowance**, Reg. Sch. II:Cl. 3
- Windup**, *see* Winding-up
- Winnipeg Stock Exchange**, *see also* TSX
- prescribed stock exchange, 262
- Wipf case overruled**, 143
- Withholding**, 153(1), 212, 227, *see also* Remittance of taxes withheld
- actors, non-resident, 212(5.1)–(5.3)
 - agreement not to withhold, void, 227(12)
 - amount of, deemed received by payee, 153(3)
 - amounts deemed held in trust, 227(4), (4.1)
 - amounts in trust not part of estate, 227(5)
 - amounts not remitted, liability to pay, 227(9.4)
 - annuity payment or commutation, 153(1)(f)
 - assessment for, 227(10), (10.1)
 - definitions, 227(10.8)
 - binding on federal and provincial governments, 227(11)
 - commissions, 153(1)(g)
 - death benefit, 153(1)(d)
 - deferred profit sharing plan payment, 153(1)(h)
 - directors liable for, 227.1
 - dividends received by broker/dealer, 153(4), (5)
 - election for, 153(1)(n), 153(1.1)
 - to increase, 153(1.2), Reg. 109
 - employee outside Canada, exemption, Reg. 104(2)
 - employees, 153(1)(a)
 - employment earnings supplement, 153(1)(s)
 - employment insurance benefit, 153(1)(d.1), Reg. 100(1)“remuneration”(g)
 - exemptions
 - credits on TD1 exceeding tax, Reg. 104(1)
 - employee outside Canada, Reg. 104(2)
 - Home Buyers' Plan, Reg. 104(3)–(4)
 - Lifelong Learning Plan, Reg. 104.1
 - failure to remit amounts withheld, penalty, 227(9)
 - interest payable, 227(9.2)
 - salary or wages, from, 227(9.5)
 - failure to withhold, 215(6), 227(8)–(10)
 - interest on amounts, 227(8.3)
 - retirement compensation arrangement, 227(8.2)
 - fees and commissions, 153(1)(g)
 - government assistance program, prescribed benefit, 153(1)(m)
 - Home Buyers' Plan, exemption, Reg. 104(3)–(4)
 - income-averaging annuity contract payment, 153(1)(k)
 - income from employee life and health trust, 153(1)(s), Reg. 100(1)“remuneration”(h.1)
 - non-resident, 212(1)(w)
 - information return, Reg. 210
 - interest on amounts not deducted or withheld, 227(8.3)
 - interference with remittances, 227(5.2)–(5.4) (1995 draft, abandoned)
 - labour-sponsored funds share disposition, 211.8(2)
 - labour-sponsored funds tax credit, 211.7(2)
 - large employers, must remit through financial institution, 153(1), Reg. 110
 - exception, 153(1.4)
 - liability to pay amount not deducted or withheld, 227(8.4)
 - Lifelong Learning Plan, exemption, Reg. 104.1
 - no action against withholder, 227(1)
 - non-periodic payments, Reg. 103
 - non-residents, *see also* Non-resident tax
 - actors, 212(5.1)–(5.3)
 - employees, 153(1)(a)(ii), 153(6), (7)
 - fees for services, Reg. 105
 - insurers, Reg. 800–805.1
 - interest, dividend and other passive income, 212
 - payments through an agent, 215
 - mutual fund distributions, 218.3
 - not required, where, Reg. 104, 104.1
 - Old Age Security benefits, 180.2(3), (4)
 - partnership, 212(13.1), 227(15)
 - patronage dividends, from, 135(3)
 - payroll, 153(1)(a), Reg. 100–111
 - reductions for certain amounts withheld by employer, Reg. 100(3)
 - penalty, 227(8)
 - pension benefit, 153(1)(b)
 - reduction of, Reg. 809
 - refund of, 227(6), (7)
 - registered disability savings plan, 153(1)(i)
 - registered education savings plan, 153(1)(t), Reg. 103(6)(g), 103(8)
 - registered retirement income fund payment, 153(1)(l), Reg. 103(4), 103(6)(d.1)
 - registered retirement savings plan payment, 153(1)(j)
 - regulations, Reg. Part I
 - remittance deadlines, source deductions, Reg. 108
 - remittances to Receiver General, 153(1), Reg. 108
 - retirement compensation arrangement contribution, 153(1)(p)
 - retirement compensation arrangement distribution, 153(1)(q)
 - retirement compensation arrangement purchase price, 153(1)(r)
 - retiring allowance, 153(1)(c)
 - return required of employee, 227(2)
 - salary, 153(1)(a)
 - severance pay, 153(1)(c)
 - stock option benefits, 153(1.01)
 - superannuation benefit, 153(1)(b)
 - supplementary unemployment plan benefit, 153(1)(e)
 - termination pay, 153(1)(c)
 - trustee etc., liability for, 227(5), (5.1)
 - unclaimed dividends etc., 153(4), (5)
 - undue hardship, 153(1.1)
 - unemployment insurance benefit, 153(1)(d.1), Reg. 100(1)“remuneration”(g)
 - wages, 153(1)(a)
- Within a time, computation of**, *Interpretation Act* 27(5)
- Witness**
- rights of at inquiry, 231.4(5)
- Wood waste**
- defined, Reg. 1104(13)
 - included in eligible waste fuel, Reg. 1104(13)“eligible waste fuel”
- Woodlot**
- intergenerational rollover, 70(9)(a), 70(9.3)(c), 73(3)(c)
 - prescribed forest management plan, Reg. 7400

- Woods assets, capital cost allowance**, Reg. 1100(1)(f), Reg. Sch. IV
- Work camp**, *see* Construction work camp
- Work in progress of professional business**
- deemed to be inventory, 10(5)(a)
 - election to exclude from income until 2017, 34
 - transitional rule 2017–2020, 10(14.1)
 - valuation of, 10(4)(a)
- Work space in home**
- limitation on deductibility
 - from business income, 18(12)
 - from employment income, 8(13)
- Worker Adjustment Programs**, *see* Older Worker Adjustment Program for; Plant Workers Adjustment Program
- Workers' compensation payment**
- deduction in computing taxable income, 110(1)(f)(ii)
 - disclosure of taxpayer information by CRA, 241(4)(n)
 - inclusion in income, 56(1)(v)
 - information return, Reg. 232
- Working Income Tax Benefit**, *see* Canada Workers Benefit (former Working Income Tax Benefit)
- Working Ventures Fund**, *see* Labour-sponsored funds tax credit
- Workplace Safety and Insurance Board**, *see* Workers' compensation payment
- World Anti-Doping Agency**
- employment income from, deduction for, 110(1)(f)(iii), Reg. 8900(2)
- Writing**
- defined, *Interpretation Act* 35(1)
- Wrongful dismissal award**, *see* Retiring allowance
- X, Y, Z**
- X-rays**
- cost of, as medical expense, 118.2(2)(o)
- YMPE**, *see* Year's Maximum Pensionable Earnings
- Yacht**
- expense of, not deductible, 18(1)(l)(i)
 - limitation on CCA claim where rented out, Reg. 1100(15)–(20)
- Year**, *see* Calendar year; Taxation year
- Year-end**
- deemed
 - charity, on notice of revocation, 188(1)
 - foreign affiliate, 91(1.2)
 - where control of corporation changes, 249(4)
 - where corporation becomes or ceases to be CCPC, 249(3.1)
 - where corporation becomes or ceases to be exempt, 149(10)
 - where corporation becomes or ceases to be financial institution, 142.6(1)
 - transactions straddling, to defer income, *see* Straddle transactions
- Year's Maximum Pensionable Earnings**
- base for SR&ED proxy amount re salaries, Reg. 2900(7)
 - current, "CPP Contributions" table, *see* introductory pages
 - defined, Reg. 8500(1)
- Young child supplement**, 122.61(1.2)
- Yukon Territory**, *see also* Northern Canada
- additional \$0.04 reasonable kilometrage allowance, Reg. 7306(c)
 - tax rates, *see* introductory pages
- ZEPV**, *see* Zero-emission passenger vehicle
- ZETM**, *see* Zero-emission technology manufacturing
- ZETM cost of capital**
- defined, Reg. 5202, 5204
- ZETM cost of labour**
- defined, Reg. 5202, 5204
- ZEV**, *see* Zero-emission vehicle
- Zanatta case overruled**, 118.2(2.21)
- Zapper software (or hardware)**
- use, possession, manufacture or sale of
 - administrative penalty, 163.3
 - criminal offence, 239.1
- Zero, minimum amount for formula calculations**, 257
- Zero-emission passenger vehicle**
- capital cost limited to \$55,000, 13(7)(i), Reg. 7307(1.1)
 - defined, 248(1)
- Zero-emission technology manufacturing**
- rate reduction (credit), 125.2, Reg. 5202, 5204
- Zero-emission technology manufacturing profits**
- credit for, 125.2(2)
 - defined, 125.2(1)
- Zero-emission vehicle**, *see also* Zero-emission passenger vehicle
- capital cost allowance
 - classes, Reg. Sch. II:Cl. 54, 55, 56
 - whether cost limited to \$55,000, 13(7)(i), Reg. 7307(1.1)
 - 100% in year of acquisition, Reg. 1100(1)(a)(xl), (xli), 1100(2)A(e)(i), (f)(i)
 - defined, 248(1), Reg. 1102(26)
 - off-road vehicle, Reg. Sch. II:Cl. 56
- Zinc**, *see* Critical mineral
- Zone**
- economic, *see* Exclusive economic zone
 - prescribed, *see* Northern Canada
 - tax-free, ITAR 26(3)
- Zoos relief (COVID)**, Reg. 8901.1(2)(b)(v), *see also* Qualifying tourism or hospitality entity
- Numbered**
- 10/8 policy**
- defined, 248(1)
 - no deduction for interest on money borrowed to acquire, 20(2.01)
 - no deduction for premiums paid, 20(1)(e.2)(ii)
 - no increase in CDA for death benefit, 89(1)"capital dividend account"(d)(iv)
- 1942 Conventions**
- defined, Canada-U.S. Tax Treaty:Art. III:1(j)
- 1948 Income Tax Act, The, defined**, ITAR 12
- 1971 receivables**, ITAR 23(5)"1971 receivables"
- 65302 British Columbia Ltd. case overruled**, 67.6
- 1245989 Alberta (Wild) case overruled**, 245(1)"tax benefit"(c)