

**Honorable Dominic LeBlanc**

Minister of Finance  
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**Honourable Élisabeth Brière**

Minister of National Revenue  
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**Mr. Peter Fonseca, M.P.**

Chair, Standing Committee on Finance  
peter.fonseca@parl.gc.ca

## Re: Finance Committee Pre-Budget Recommendations

December 20, 2024

Dear Honourable Ministers LeBlanc and Brière, and Mr. Fonseca,

On December 13, the House of Commons Standing Committee on Finance (Committee) released [Report 21, Pre-Budget Consultations in Advance of the 2025 Budget](#). The Committee makes 462 wide-ranging recommendations including several that impact the charitable sector.

The Canadian Centre for Christian Charities (CCCC) is the largest association of Christian charities in Canada, with over 3,200 members and over 50 years of leadership and service to Canadian Christian ministries. We write to you about two deeply concerning recommendations within the Report relating to charities, namely:

- Recommendation 429: No longer provide charitable status to anti-abortion organizations.
- Recommendation 430: Amend the *Income Tax Act* to provide a definition of a charity which would remove the privileged status of “advancement of religion” as a charitable purpose.

### Recommendation 429 Politicizes Charitable Status

CCCC has written to the government multiple times on the politicization of charitable status, in response to Mandate Letters, proposed *Income Tax Act* (ITA) amendments, and sealing.<sup>1</sup>

Recommendation 429 singles out a subset of charities based on activities that reflect a particular opinion, view or belief on a specific issue that does not align with those of the current government and therefore can be viewed as informed solely by political considerations. As such, Recommendation 429 constitutes an unwarranted politicization of charitable status.

Here, “anti-abortion” charities are targeted, a term that is vague and therefore broad in scope. But perhaps another government will take issue with environmental charities, or charities with certain views about [Canada’s seal harvest](#), or charities that promote humanist ideals. If pursued,

this Recommendation would make it easy, where ideological differences are significant, for future governments to imperil the charitable status of organizations with which they disagree.

But this approach to charitable status puts every single Canadian charity at risk. It means that every time a new government is elected new requirements can be imposed and charitable status for specific groups could be in jeopardy. Certain charities could be singled out for additional monitoring, reporting, audits and revocation simply because they hold different views, or engage in a specific subset of activities that do not align with the current government's beliefs, preferences and priorities.

Canada is a diverse and pluralistic nation. Its diversity is represented in many ways, including through its charitable organizations. That diversity deserves respect. Charities ought not to be used as pawns in political games or face existential threats as a result of political purposes.

### **Recommendation 430 Threatens to Eliminate Almost 40% of Canadian Registered Charities**

Recommendation 430 is troubling for many reasons, not least of which is that this proposal would impact almost 40% of Canadian registered charities and it appears that none of the more than 32,000 charities advancing religion have been consulted.

Advancement of religion is one of four legally recognized heads of charity, over which provinces retain constitutional jurisdiction. Charities advancing religion engage in a remarkable range of activities that build and support Canadian civic society. For example:

- Adoption/Fostering
- Schools & Teaching
- Language Training & Translation
- Summer Camps
- Broadcasting
- Publishing Literature
- Churches
- Mosques
- Synagogues
- Temples
- Clothing Distribution
- Environmental Advocacy & care
- Leadership Training
- Meals
- Education
- Disaster & Emergency Response
- Employment Services
- Evangelism
- Food Security
- Healthcare
- Hospitals
- Low-Income or Subsidized Housing
- Human Rights
- Anti-Human Trafficking & Slavery Advocacy
- Indigenous Community Support & Engagement
- Prison Ministry
- Rehabilitation
- International Humanitarian Relief
- Relief of Poverty
- Senior Care and Support
- Spiritual Development
- Sports Outreach & Training
- Support For People with Disabilities
- Transitional Housing
- Urban Ministry
- Clean Water Initiatives

It is almost incomprehensible to imagine a Canadian charitable sector absent religious organizations. Focusing solely on religious congregations (places of worship), research shows that the [“halo effect”](#) of these organizations is 10.47 times the value of any tax exemptions and

credits. In an age of declining charitable donations, regular [attendance at religious services increases amounts donated](#) and the likelihood of donations by the average Canadian. In 2010, religiously active Canadians donated an [average of \\$1,004](#). Those who were less active or not religiously active gave an average of \$313. Social science [research confirms the essential, positive contributions of religious organizations](#) to civic society.

Advancing religion is, in and of itself, a social good. The contributions and positive impacts of religion ought to be affirmed and fostered in a diverse, multicultural, multi-religious society such as Canada. This proposal does the exact opposite – it ignores, marginalizes and denigrates religious charities, their volunteers, their donors, and the individuals and communities they serve.

This proposal is also completely at odds with Recommendation 215, which is to invest in a dedicated national anti-Islamophobia strategy, including investing into public education campaigns to drive down anti-Muslim sentiment. The government cannot, on the one hand, suggest that it has the interests of religious communities at heart and, on the other hand, strip them of registered charitable status. The incongruity of recommending both actions is remarkable.

Further, both of these proposals raise serious *Charter of Rights and Freedoms* concerns including freedom of expression and freedom of religion. Free expression ensures that everyone can express their thoughts, opinions, and beliefs, however unpopular or contrary to the mainstream. Religious freedom means the government must preserve a neutral public space where there is true freedom to believe or not to believe.

## **Conclusion**

The government should not move forward with the Committee's Recommendations 429 and 430. The Recommendations politicize charitable status, raise serious *Charter* concerns, and set a dangerous and destabilizing precedent for the charitable sector.

We encourage you, as have other organizations, to abandon these Recommendations.

As always, CCCC remains available and willing to participate in meaningful and collaborative discussions on this issue. We look forward to hearing from and working with you.

Yours truly,



Deina Warren  
Director of Legal Affairs  
Canadian Centre for Christian Charities

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<sup>i</sup> November 24, 2021, “Charitable Status & Pro-Life Organizations” (addressed to then Deputy Prime Minister and Minister of Finance Chrystia Freeland and then Minister of National Revenue Diane Lebouthillier); December 22, 2021, “Charitable Status & Pro-Life Organizations” (addressed to then Deputy Prime Minister and Minister of Finance Chrystia Freeland and then Minister of National Revenue Diane Lebouthillier and Minister of Women and Gender Equality and Youth Marci Ien); March 7, 2022, “Re: Charitable Status” (in collaboration with other organizations; addressed to Deputy Prime Minister and Minister of Finance Chrystia Freeland and then Minister of National Revenue Diane Lebouthillier and Minister of Women and Gender Equality and Youth Marci Ien); November 15, 2022, “Open Letter to the Minister of Finance re: Charitable Status” (addressed to then Deputy Prime Minister and Minister of Finance Chrystia Freeland); October 15, 2024 “Letter re: Charitable Status” (addressed to then Deputy Prime Minister and Minister of Finance Chrystia Freeland, Minister of National Revenue Marie-Claude Bibeau, Minister of Fisheries, Oceans and the Canadian Coast Guard Dianne Lebouthillier); November 26, 2024, “Letter re: Politicizing Charitable Status” (addressed to then Deputy Prime Minister and Minister of Finance Chrystia Freeland, Minister of National Revenue Marie-Claude Bibeau, and Minister of Women and Gender Equality and Youth Marci Ien).