

August 28, 2025

By Email to [yourbudget-votrebudget@fin.gc.ca](mailto:yourbudget-votrebudget@fin.gc.ca) and [minister-ministre@fin.gc.ca](mailto:minister-ministre@fin.gc.ca)

**Department of Finance Canada**

90 Elgin Street

Ottawa, ON K1A 0G5

Attn: Minister of Finance and National Revenue

Dear Minister Champagne:

Re: Concerns about the Politicization of Charitable Status

We are writing on behalf of our firm, which includes 16 lawyers who work directly with many organizations within the charitable and non-profit sector, to provide our comments and express our serious concerns about the proposed amendments to the *Income Tax Act* ("ITA") and the *Income Tax Regulations* ("Regulations") related to charities and reproductive services, which were included in the "Notice of Ways and Means Motion to introduce a bill to amend the *Income Tax Act* and the *Income Tax Regulations*" tabled on October 29, 2024, and confirmed in the 2024 Fall Economic Statement.

We are concerned that these proposed amendments will result in the politicization of charitable status of registered charities, specifically those charities offering reproductive health services. Such politicization in our view will undermine the neutrality of the charitable sector and should be avoided under all circumstances. Further, while the current proposed amendments are focused at this time on reproductive services charities, the precedent set by such amendments could easily extend to other charities whose views or activities do not align with those of the government of the day.

We have expressed our views on this matter in an article set out in our recently published August 2025 *Charity & NFP Law Update*, a publication which is circulated to over 9000 readers in the charitable and not-for-profit sector located throughout Canada and internationally. We have attached a copy of this article, together with copies of each of our previous articles referenced in our August 2025 article. In the event a hyperlink would be helpful, we have also included a link to the August 2025 article [here](#).

As explained in the August 2025 article, we would recommend that the Department of Finance not pursue these proposed amendments in light of the serious concerns that they raise for the neutrality of the charitable sector. It is our view that there are ample and effective existing laws, rules, and regulations available to address any issues of concern related to the conduct of charities without the need to specifically focus on charities working in a particular field.

Thank you for your consideration of our submission in this matter.

Yours truly,

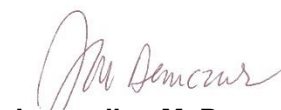
**Carters Professional Corporation**

Per:



**Terrance S. Carter**

B.A., LL.B., TEP, Trademark Agent



**Jacqueline M. Demczur**

B.A., LL.B.



**Adriel N. Clayton**

B.A. (Hons), J.D.

Enclosures

Submission from Carters to Finance 2025-08-28 v2(1423055.3).docx