From: Susan Wright <susan@torontoarts.org>

Date: Fri, Nov 11, 2016 at 3:27 PM Subject: Political Activities Consultation

To: "Consultation-policy-politique@cra-arc.gc.ca" <Consultation-policy-politique@cra-arc.gc.ca>

Cc: "info@theonn.ca" <info@theonn.ca>

c/o Charities Directorate Canada Revenue Agency Ottawa, Ontario K1A 0L5

Dear Agency officials,

I am writing on behalf of Toronto Arts Council and Toronto Arts Foundation, both charities operating in Toronto. We share the common vision of Creative City, Block by Block that aims to connect every Toronto neighbourhood to the transformative power of arts activity.

We are writing to express support for Imagine Canada's <u>political activities brief</u>. Their recommendations were created with the assistance and support of 33 organizations of varying type, size and scope, from across the country.

We advocate for the following:

- 1. We strongly support the key recommendation of Imagine Canada that the *Income Tax Act* be amended to restore an emphasis on charitable purposes, rather than regulating how charities achieve those purposes.
- 2. We agree with Imagine Canada that these amendments to the Income Tax Act are a short-term solution and must be seen as only a prelude to broader legal and regulatory reform for the charitable and non-profit sector.
- 3. We agree with all of Imagine Canada's recommendations about clarifying definitions and scope regarding *partisan political activity* so that we can be more confident in engaging in our work.

Imagine Canada makes more detailed recommendations regarding details of amending and clarifying existing guidance on political activities and, while we are supportive of their thrust, we strongly urge the government not to waste time revising current definitions, but rather to make the changes to the *Income Tax Act* as a first priority.

Thank you very much for allowing us this opportunity to participate. We encourage the federal government to recognize the critical role played by Canada's non-profits and charities and to ensure regulation governing the charitable sector provides an enabling environment for us in serving our communities.

Sincerely,

Susan Wright Deputy Director

cc: Ontario Nonprofit Network via info@theonn.ca