

DATE: July 30, 2020

SUBJECT: Tax issues relating to the COVID-19 – UPDATE V10

**This tax information bulletin cancels and replaces our previous communications.** This is an update of all special measures relating to COVID-19 announced so far by the Federal and Quebec Governments, for individuals and corporations.

To allow you an easier read, changes made since the last update are indicated by a curly brace in the right margin. You will also find attached a summary chart of all new deadlines.

This document is intended for the use of the recipient only and should not be relied upon by any other party. Do not hesitate to contact us should you require any additional information.

## **REMINDER ON TAX STATUS FOR INDIVIDUALS**

First of all, to determine the measures that apply to your situation, **as an individual**, it is very important to determine to which type of taxpayers you belong. The main types are as follows:

« **SHAREHOLDER** » This is when an individual that earns professional or business income through a corporation in which he holds shares. For the purpose of the special measures:

- If an individual holds 40% or more of the voting shares of a corporation, he will not be entitled to employment insurance regular benefits.
- If an individual holds less than 40% of the voting shares of a corporation, he will be entitled to employment insurance regular benefits, provided that he receives a remuneration in the form of wages, salaries or bonuses.

« **SELF-EMPLOYED** » This is when an individual earns professional or business income on his personal behalf, without being incorporated. Self-employed workers are not entitled to employment insurance **regular benefits**. They are only entitled to these employment insurance **special benefits**:

- Maternity or parental benefits.
- Sickness benefits.
- Compassionate care benefits for caregivers who must be away from work temporarily to provide care to a person who is with a significant risk of death.
- Family caregiver benefit for children.
- Family caregiver benefit for adults.

« **EMPLOYED** » This is when an individual receives remuneration in the form of wages, salaries or bonuses. Generally, he is entitled to employment insurance regular benefits unless he is considered as a shareholder-employee (see above).

## **APPLICABLE MEASURES FOR INDIVIDUALS**

## 1. The Canada Emergency Response Benefit (CERB) (at Federal level)

This new benefit was announced on March 25, 2020. This benefit replaces the previously announced Emergency Care Benefit and the Emergency Support Benefit. This new program offers to eligible workers a **taxable fixed amount of \$2 000 a month** (period of 4 weeks) during the period beginning on March 15, 2020 and ending on October 3, 2020 for a maximum of 16 weeks.

On June 16, the Federal government announced that the CERB will be extended for an additional eight (8) weeks. Eligible workers may receive up to a maximum of \$ 500 per week for a maximum of 24 weeks or a total of \$ 12,000. Please note that the four-week periods of eligibility remain the same and end on September 26, 2020.

The deadline to apply is December 2, 2020 (payments will be retroactive for the period in question).

The benefits will be available to workers that respect <u>all the following</u> criteria:

- a) Residing in Canada, who is at least 15 years old.
- b) You did not quit your job voluntarily
- c) For 2019 or in the 12-months period preceding the day on which an application is made, have a total income of at least \$5 000 from any or a combination of the following sources: employment, self-employment, dividend that are non-eligible, maternity or parental benefits under Employment Insurance program and/or similar benefits paid in Quebec under the Quebec Parental Insurance Plan.
- d) You have either stop working, have had your hours reduced or are unable to work due to the COVID-19 pandemic and **you are in of the following situation** :
  - If you are applying for the first time: You have stopped or will stop working, or you are working reduced hours due to COVID-19, and you don't expect to earn over \$1,000 in employment or self-employment income for at least 14 days in a row during the four-week period.

OR

If you are applying for a subsequent period: You are still not working, or you are working reduced hours due to COVID-19, and don't expect to earn over \$1,000 in employment or self-employment income, and you expect this to continue during the entire four-week period.

OR

- Your regular or fishing El benefits have run out (any time between December 29, 2019 and October 3, 2020)



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Thus, per the modification announced on April 15, 2020:

- For the first CERB claim : an individual will be eligible to CERB if he has earned \$1 000 or less in employment and/or self-employment income for 14 or more consecutive days within the four-week benefit period for which a claim is made, regardless to the amount or revenue earned for the remaining weeks of the claim period. For example, and employee that stops working on March 26, 2020 and received a salary of \$ 2 000 from March 15 to March 26, but no longer has income from March 27 to April 11 will be eligible for the CERB for the first CERB claim.
- For the subsequent periods: an individual will be eligible to CERB if he has earned \$1 000 or less in employment and/or self-employment income combined within the entire four-week benefit period for which a claim is made.
- Seasonal workers and those who have recently run out of employment insurance will now also be eligible for CERB.

Four- week period cycle	Period dates
1	March 15, 2020 to April 11, 2020
2	April 12, 2020 to May 9, 2020
3	May 10, 2020 to June 6, 2020
4	June 7, 2020 to July 4, 2020
5	July 5, 2020 to August 1, 2020
6	August 2, 2020 to August 29, 2020
7	August 30, 2020 to September 26, 2020

e) CERB is divided into four-week periods which have been established as follows:

- f) If you start working again, CRA will automatically cancel your CERB request. If the individual they proceed to stop working of another 14 consecutive days, he will have to submit a new application.
- g) You may want to return or be required to repay the CERB if you are in any of the following situations:
  - you return to work earlier than expected;
  - you receive retroactive pay from your employer;
  - you applied for the CERB but later realize you're not eligible;
  - or you receive a CERB payment from both Service Canada and the CRA for the same period.

Since the CERB is taxable, you can expect to receive an information slip indicating the total amounts of CERB payments you received in 2020. If you return the overpayment prior to December 31, 2019 (this is what we recommend), the information slip will be adjusted accordingly. 2020.

h) The Custom Revenue Agency has 6 years to assess.



The application form is available since **April 6**, **2020**. You can apply in one of these three ways: by accessing it on your CRA My Account secure portal; by accessing it from your secure My Service Canada Account; or by calling a toll free number. Individuals not yet registered should apply as soon as possible because receiving a security code may take 5 to 10 days. You will need to apply and confirm your eligibility to the CERB every four weeks.

## 2. Employment Insurance Sickness Benefits (at Federal level)

This benefit is for individuals which are **eligible for employment insurance** (this excludes the self-employed workers). **All of the following conditions must be met**:

- a) You are unable to work for medical reasons.
- b) Your regular weekly earnings from work have **decreased by more than 40%** for at least one week.
- c) You accumulated **600 insured hours in the 52 weeks** before the start of your claim or since the start of your last claim, whichever is shorter.

The federal government wants to support individuals affected by COVID-19 and placed in quarantine with the following support actions:

- a) The one-week waiting period for El sickness benefits will be waived for new claimants who are quarantined so they can be paid for the first week of their claim.
- b) Establishing a new dedicated toll-free phone number to support enquiries related to waiving El sickness benefits waiting period: 1-833-381-2725
- c) People claiming El sickness benefits due to quarantine will not have to provide a medical certificate.
- d) People who cannot complete their claim for El sickness benefits due to quarantine may apply later and have **their claim backdated to cover the period of delay**.



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## 3. Canada Emergency Student Benefit (CESB)

The CESB is a **taxable** benefit that provides a payment of **\$1 250** (\$2 000 is you have dependants or a disability) for each four-week period for a maximum of 16 weeks from May to August 2020. This program provides financial support to post-secondary students and recent post-secondary and high school graduates who are unable to find work due to COVID-19 and **are not eligible to the CERB or the employment insurance**.

In order to qualify for this benefit, the individuals but respect all the following criteria:

- a) You did not apply, receive, nor qualify, for the CERB or EI benefits for the same eligibility period.
- b) You are either: a Canadian citizen, a registered Indian, a permanent resident or a protected person under immigration laws.
- c) You are studying in Canada of abroad.
- d) **One** of the following applies:
  - You are enrolled in a post-secondary educational program (at least 12 weeks in duration) that leads to a degree, diploma, or certificate.
  - OR
  - You completed or ended your post-secondary studies in December 2019 of later.

OR

- You completed or expect to complete high school, or received, or expect to receive you high school equivalency in 2020, and have applied for a postsecondary program that starts before February 1<sup>st</sup>, 2021.
- e) **One** of the following also applies :
  - You are unable to work due COVID-19.

OR

- You are looking for, but cannot find work due COVID-19.

OR

 You are currently working during the COVID-19 pandemic, but your income from employment and self-employment has been \$1 000 or less during the four-week period you are applying for.



	Claiming period
Period 1	May 10 to June 6, 2020
Period 2	June 7 to July 4, 2020
Period 3	July 5 to August 1 <sup>st</sup> , 2020
Period 4	August 2 to August 29, 2020

f) CESB is divided into four-week periods which have been established as follows:

## 4. Temporary Aid for Workers Program (PATT COVID-19) (Quebec)

The Quebec government announced on April 8, 2020 that this program will no longer be available due the **CERB federal program** increasing its availability to more individuals. It is no longer possible to claim this aid.

## 5. Additional Measures to Support Individuals and Families

The federal government have announced the following measures to support individuals and families most affected by the COVID-19. More specifically:

- a) **One-time special payment by early May 2020:** through the **Goods and Services Tax credit** (GSTC). The maximum annual GSTC payment amounts for the 2019-2020 benefit's year will double. The average boost to income for those benefitting from this measure will be close to \$400 for single individuals and close to \$600 for couples.
- b) Increase the maximum annual Canada Child Benefit (CCB): payment amounts, by early May 2020, only for the 2019-2020 benefit year, by \$300 per child.
- c) **Placing a six-month interest-free moratorium** on the repayment of Canada Student Loans for all individuals currently in the process of repaying these loans.
- d) Reducing required minimum withdrawals from Registered Retirement Income Funds (RRIFs) by 25% for 2020, in recognition of volatile market conditions and their impact on many seniors' retirement savings.
- e) **Second instalment of municipal taxes** postponed by many cities and municipalities;
- f) Starting Monday, March 23, Hydro-Québec will stop applying administration charges for unpaid bills until further notice for all customers. Customers unable to pay their electricity bills over the coming months will thus not be penalized.
- g) Incentive program to retain essential workers (IPREW): This Quebec program main goal is to compensate the essential workers by paying them the difference between their salary and the CERB. The program provides \$100 for each week of qualifying work beginning March 15, 2020, and extending for a maximum of 16 weeks. This means that, in addition to their wages, a worker could receive a taxable benefit of \$400 per month, for a total of \$1,600 for the full 16-week period. For additional information: <u>https://www.revenuquebec.ca/en/online-services/onlineservices/online-services/apply-for-the-incentive-program-to-retain-essentialworkers/incentive-program-to-retain-essential-workers/</u>



## 6. New Filing and Payments Deadline for Individual

a) Filing Deadline for individual Tax Returns

The deadline for producing and filing the 2019 tax return for individuals (not in business) has been postponed to June 1, 2020. Please note that the deadline for producing and filing the 2019 tax returns for individuals in business is still on June 15, 2020.

For individuals who die between January 1 and October 31, 2019<sup>1</sup> inclusive, the filing deadline for the 2019 tax return has been postponed to June 1, 2020. For individuals who die after October 31, 2019<sup>1</sup> and before June 1, 2020, the filing deadline for the current tax return is the later between June 1, 2020 or six months after their day of death.

This extension also applies to form T106, T1135, and any elections, forms and schedules that must be filed with the return.

Penalties (including late-filing penalties) and interest will not be applied if returns are filed and payments are made by September 30, 2020.

b) Balance Due Payment Deadline

For individuals and individuals in business (**except for** individuals who die after October 31, 2019<sup>1</sup> and before June 1, 2020), the deadline for paying any income tax balance, any contributions or the REQ annual registration fees for 2019, originally due on April 30 2020, has been extended to September 30, 2020. No penalty or interest should be charged if payments are made by September 30, 2020.

For individuals who die after October 31, 2019<sup>1</sup> and before June 1, 2020, the deadline for paying any income tax balance will be the later between June 1, 2020 or six months after their day of death.

c) Tax Instalments:

The deadline for paying tax instalments usually due on June 15, 2020 and September 15, 2020 is postponed to September 30, 2020. No penalty or interest should be charged if payments are made by September 30, 2020.

- d) **GST/HST and QST:** To support businesses in the current circumstances, the federal government will extend until June 30, 2020 the time that:
  - Monthly filers have to remit amounts collected for the February, March and April 2020 reporting periods;
  - Quarterly filers have to remit amounts collected for the January 1, 2020 through March 31, 2020 reporting period; and
  - Annual filers, whose GST/HST instalments are due in March, April or May 2020, have to remit amounts collected and owing for their previous fiscal year and instalments of GST/HST in respect of the filer's current fiscal year.

<sup>&</sup>lt;sup>1</sup> Quebec has chosen the date of November 30, 2019 instead of October 31, 2019



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- Quebec government is following the federal government's lead and allowing businesses to postpone until June 30, 2020 their payments in respect of the March 31, April 30 and May 31, QST remittances, without interest or penalties.
- e) Time Limit for Filing a Notice of Objection

The new deadline is June 30, 2020 for any <u>Federal</u> notice of objection which shall be filed during the period beginning on March 18, 2020 and ending on June 29, 2020. The new deadline is June 30, 2020 for any <u>Quebec</u> notice of objection which shall be filed during the period beginning on March 13, 2020 and ending on June 29, 2020.

Please note that as of today, source deductions must still be filed and paid within the prescribed deadlines.



## **APPLICABLE MEASURES FOR CORPORATION**

#### 1. New Filing and Payments Deadline for Corporation

a) Filing Deadline for Corporation Income Tax Returns (T2)

The new deadline for corporations that would otherwise have a filing due date after March 18, 2020 and before May 31, 2020 is June 1, 2020. Please note that the Quebec has chosen the date of March 17, 2020 instead of March 18, 2020.

The new deadline for corporations that would otherwise have a filing due date on May 31, or in June, July or August 2020 is September 1, 2020. Penalties (including late-filing penalties) will not be applied if returns are filed by September 30, 2020.

This extension also applies to form T106, T1135, and any elections, forms and schedules that must be filed with the return.

**Important reminder:** A corporation must pay the balance due within 2 months after the end of the tax year (3 months for Federal under certain conditions). **Please note** that this relief measure, extending the balance due payment deadline to September 1, 2020, is only valid for corporations with a year-end date on January 31, 2020 or after.

b) Filing Deadline for Trusts Income Tax and information Return (T3)

The new deadline for trusts that would otherwise have a filing due date on March 30, 2020 is May 1, 2020

The new deadline for trusts that would otherwise have a filing due date after March 30 and before May 31, 2020 is June 1, 2020.

The new deadline for trusts that would otherwise have a filing due date on May 31, or in June, July or August 2020 is September 1, 2020. Penalties (including late-filing penalties) will not be applied if returns are filed by September 30, 2020.

This extension also applies to form T106, T1135, and any elections, forms and schedules that must be filed with the return.

c) Filing Deadline for Partnership Information Return (T5013)

The new deadline for partnerships that would otherwise have a filing due date on March 31, 2020 is May 1, 2020.

The new deadline for partnerships that would otherwise have a filing due date after March 31 and before May 31, 2020 is June 1, 2020.

The new deadline for partnerships that would otherwise have a filing due date on May 31, or in June, July or August 2020 is September 1, 2020. Penalties (including late-filing penalties) will not be applied if returns are filed by September 30, 2020.



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#### d) Filing Deadline for Registered Charity Information Return (T3010)

The new deadline for registered charities with form T3010 due between March 18, 2020 and December 31, 2020 is December 31, 2020.

- e) Balance Due Payment Deadline: The deadline for corporations or trusts to pay any tax balance originally due on or after March 18, 2020 and before September 1, 2020 has been extended to September 30, 2020. Please note that the Quebec has chosen the date of March 17, 2020 instead of March 18, 2020. No penalty or interest should be charged if payments are made by September 30, 2020.
- f) Tax Instalments: The deadline for a corporation to pay any tax instalment originally due on or after March 18, 2020 and before September 1, 2020 has been extended to September 1, 2020. Please note that the Quebec chose the date of March 17, 2020 instead of March 18, 2020. No penalty or interest should be charged if payments are made by September 30, 2020.
- g) **GST/HST and QST:** To support businesses in the current circumstances, the federal government will extend until June 30, 2020 the time that:
  - Monthly filers have to remit amounts collected for the February, March and April 2020 reporting periods.
  - Quarterly filers have to remit amounts collected for the January 1, 2020 through March 31, 2020 reporting period; and
  - Annual filers, whose GST/HST instalments are due in March, April or May 2020, have to remit amounts collected and owing for their previous fiscal year and instalments of GST/HST in respect of the filer's current fiscal year.
  - Quebec government is following the federal government's lead and allowing businesses to postpone until June 30, 2020 their payments in respect of the March 31, April 30 and May 31, QST remittances, without interest or penalties.
- h) Time limit for filing a notice of objection. The new deadline is June 30, 2020 for any notice of objection which shall be filed during the period beginning on March 18 (Federal)/ March 13 (Quebec), 2020 and ending on June 29, 2020.

Please note that as of today, **source deductions** must still be filed and paid within the prescribed deadlines.



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## 2. Canada Emergency Wage Subsidy (CEWS)

The Canada Emergency Wage Subsidy (hereinafter "CEWS") provides the eligible employers a wage subsidy representing 75% of the remuneration paid for a maximum of 24 weeks from March 15, 2020 to August 29, 2020. On July 13, 2020, Prime Minister announced federal government's intention to extend the CEWS until December 2020. On July 27, 2020, the bill C-20 was adopted by the House of Commons. The CEWS is extended until December 19, 2020. Note, however, the new details only apply up to the period ending on November 21, 2020, in order to keep some flexibility for the December period. 5 additional periods are thus added i.e. periods 5 to 9.

We would like to mention first that the rules for calculating the CEWS remain the same for periods 1 to 4. We'll refer to these rules as the « original rules ».

From July 5, 2020 (period 5), the new rules for calculating the CEWS apply <sup>2</sup>. The new rules have two different CEWS rate structures: one calculated based on remuneration paid to **active employees** and the second for **employees that are furloughed** (i.e. on leave).

#### Subsidy rate for active employees:

The subsidy rate for **active employees** is based on a two-part calculation that determines:

- A base subsidy rate
- A top-up subsidy rate

The total subsidy rate is then applied to the amount of remuneration paid to the employee for the eligibility period, on remuneration of up to \$1,129 per week.

From period 5, for active arm's-length employees, the amount of remuneration would be **based solely** on actual remuneration paid for the eligibility period, **without reference to the pre-crisis remuneration** used for earlier CEWS period.

#### Base subsidy rate calculation:

- The rate depends on the actual decline in revenue: the higher the decline, the higher the rate. Employers with a revenue decline even of less than 30 % will be eligible for a base CEWS rate for active employees. Where the decline is 50 % or more, the base rate is capped at 60 % for periods 5 and 6. This cap drops further for periods 7, 8 and 9.
- Like the original rules, employers can compare their current revenue to their revenue in same month in 2019 (« general approach ») or their average monthly revenue for January and February 2020 (« alternative approach »). For this test, employers can use revenue for either the current or the prior month, so they can automatically qualify for the following period using the same revenue reduction when this is to their benefit.

<sup>&</sup>lt;sup>2</sup> Only for periods 5 and 6, employers can apply the « original rules » rather than the new rules, if this increases their subsidy.



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• The comparison test chosen in period 5 claims must then be used for the balance of the program for calculating both the base and the top-up CEWS rates. The choice made for periods 1 to 4 under the original rules does not affect the decision for period 5.

Please refer to the summary chart shown on page 14

#### Top-up subsidy rate calculation:

- The top-up portion of the subsidy aims to help employers whose revenue has dropped by 50 % or more.
- Similar to the base subsidy, the top-up rate varies based on the size of the revenue drop and is subject to a cap of 25 %. This cap applies if the three-month average revenue drop is 70 % or more. However, unlike the case subsidy, the rate and cap amounts do not decline over time.
- The revenue drop is determined under the general approach by comparing revenues in the preceding three months to the same months in the prior year.
- Under the alternative approach, the drop is determined by comparing average monthly revenue in the preceding three months to the average monthly revenue in January and February 2020.

Please refer to the summary chart shown on page 15

#### Subsidy rate for furloughed employees:

The new rules set a separate calculation for employees who have been «furloughed». For period 5 and later periods, the CEWS for furloughed employees will be available to eligible employers who qualify for the base or top-up rate for active employees in the relevant period.

For periods 5 and 6, the subsidy is the same as for periods 1 to 4. Beginning in period 7, CEWS support for furloughed employees will be adjusted to align with the benefits provided through the Canada Emergency Response Benefit (CERB) and/or Employment Insurance (EI).

Also, the employer portion of contributions for furloughed employees to the Canada Pension Plan, El, Quebec Pension Plan and Quebec Parental Insurance Plan will continue to be refunded to the employer.



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#### Other CEWS changes

Along with the new formulas and calculations, the new rules include the following:

- New continuity rules for the calculation of an employer's drop in revenues in certain circumstances where the employer purchased all or substantially all the assets used in carrying on business by the seller.
- **Formal appeal process** based on the existing procedure for notices of determination that allows for an appeal to the Tax Court of Canada.
- Amalgamations: Corporations formed on an amalgamation of two or more predecessor corporations (or where a corporation is wound up into another) are now allowed to calculate benchmark revenue for the CEWS revenue-decline test using their combined revenues, unless it is reasonable to consider that one of the main purposes for the amalgamation (or the winding up) was to qualify for the CEWS.



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#### The chart below sets out the base subsidy rate formula to be used for active employees and comparison periods for periods 5 to 9:

	PERIOD 5	PERIOD 6	PERIOD 7	PERIOD 8	PERIOD 9
	Jul. 5 – Aug. 1	Aug. 2 – Aug. 29	Aug. 30 – Sep. 26	Sep. 27 – Oct. 24	Oct. 25 – Nov. 21
Subsidy rate	1.2 X revenue drop, to a maximum of 60 %	1.2 X revenue drop, to a maximum of 60 %	1.0 X revenue drop, to a maximum of 50 %	0.8 X revenue drop, to a maximum of 40 %	0.4 X revenue drop, to a maximum of 20 %
Comparison test – general approach	July 2020 over July 2019, or	August 2020 over August 2019, or	September 2020 over September 2019, or	October 2020 over October 2019, or	November 2020 over November 2019, or
	June 2020 over June 2019	July 2020 over July 2019	August 2020 over August 2019	September 2020 over September 2019	October 2020 over October 2019
Comparison test – alternative approach	July 2020 or June 2020 over average of January and February 2020	August 2020 or July 2020 over average of January and February 2020	September 2020 or August 2020 over average of January and February 2020	October 2020 or September 2020 over average of January and February 2020	November 2020 or October 2020 over average of January and February 2020

For example, if the revenue drop in period 5 using either the general approach or the alternative approach is 40 %, the base subsidy rate is 48 % (1,2 X 40 %).



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The chart below sets out the top-up subsidy rate formula to be used for active employees and comparison periods for periods 5 to 9:

	PERIOD 5	PERIOD 6	PERIOD 7	PERIOD 8	PERIOD 9
	Jul. 5 – Aug. 1	Aug. 2 – Aug. 29	Aug. 30 – Sep. 26	Sep. 27 – Oct. 24	Oct. 25 – Nov. 21
Subsidy rate (RD = revenue drop **)	1.25 X (RD – 50 %), to a maximum of 25 %	1.25 X (RD – 50 %), to a maximum of 25 %	1.25 X (RD – 50 %), to a maximum of 25 %	1.25 X (RD – 50 %), to a maximum of 25 %	1.25 X (RD – 50 %), to a maximum of 25 %
Comparison test – general approach	April to June 2020 over April to June 2019	May to July 2020 over May to July 2019	June to August 2020 over June to August 2019	July to September 2020 over July to September 2019	August to October 2020 over August to October 2019
Comparison test – alternative approach	April to June 2020 average over January and February 2020 average	May to July 2020 average over January and February 2020 average	June to August 2020 average over January and February 2020 average	July to September 2020 average over January and February 2020 average	August to October 2020 average over January and February 2020 average

\*\* Although the legislation is unclear, we assume that the subsidy rate cannot be negative.

For example, where the revenue decline is 60 %, the top-up subsidy rate is 12.5 % (1.25 X (60 % - 50 %)).



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In order to claim this subsidy, **all the following criteria** must be respected:

- a) **Eligible employers:** all of the following conditions must be met:
  - Be:
    - An individual (excluding trusts);
    - Taxable corporation (regardless of small or large business);
    - Non-profit organization or registered charity;
    - Partnership consisting of eligible employer

Public bodies would not be eligible for this subsidy. Public bodies include municipalities and local governments, Crown corporations, public universities, colleges, schools and hospitals.

- b) Have an existing business number and payroll program account with the CRA on March 16, 2020 and:
- c) **Eligible remuneration** may include salary, wages or other remunerations paid to an eligible employee (amounts for which employers would generally be required to withhold or deduct amounts to remit to tax authorities on account of the employee's income tax obligation). However, it does not include severance pay, or items such as stock option benefits or the personal use of a corporate vehicle.

An **eligible employee** is an individual who is employed in Canada by you (the eligible employer) within the CEWS period. However, the employee will be eligible if, within the claim period, he was without any salary (eligible remuneration) from you for 14 consecutive days.

In other words, as an employer, you will not be able to claim the CEWS for an employee that was not paid by you for 14 days or more within the period, even if that said employee is not eligible to the CERB.

Starting in period 5, an employee no longer has to be paid for 14 consecutive days to meet the definition of an eligible employee.

- d) See a drop of at least 15% of its revenue for March 2020 and at least 30% for the following months, as a result of reasons related to COVID-19 during eligible periods.
  - In applying for the subsidy, employers would be required to attest to the decline in revenue.
  - This drop of revenue will be calculated as follows:
    - Include its revenue from its business carried on in Canada earned from arm's-length sources.
    - Exclude revenues from extraordinary items
    - Exclude amounts on account of capital.



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- The employers would be allowed to calculate their revenues under the accrual method or the cash method upon filing their first application.
  - They will be required to use that method for the entire duration of the program.
  - This modification will allow corporation that did not have a drop in sales, but are having difficulties to get paid by their clients to be eligible for the subsidy.
  - Under the new rules, entities that use the cash method of accounting can elect to use the accrual method for the CEWS. Once this election is made, it must be applied to all qualifying period.
- This drop of revenue would either be determined by the change in an eligible employer's monthly revenue, year-over-year, for the calendar month in which the period began or with the average revenue for January and February 2020.
  - Use the same comparison for the entire duration of the program.
  - For employers established after February 2019, eligibility would be determined by comparing monthly revenues to a reasonable benchmark.
  - If an employer qualifies for one period with the drop of revenue criteria, he is automatically presumed to qualify for the next period.

	Claiming Period	Eligibility Criteria
Period 1	March 15 – April 11	Revenue drop of 15% in March 2020 over : - March 2019 or - Average of January and February 2020
Period 2	April 12 – May 9	Either was eligible in March 2020 or ; Revenue drop of 30% in April 2020 over : - April 2019 or - Average of January and February 2020
Period 3	May 10 – June 6	Either was eligible in April 2020 or ; Revenue drop of 30% in May 2020 over : - May 2019 or - Average of January and February 2020
Period 4	June 7 – July 4	Either was eligible in May 2020 or ; Revenue drop of 30% in June 2020 over : - June 2019 or - Average of January and February 2020

• For others, the following table will be used



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If **all of the above conditions are met**, eligible employers may benefit of the Canada Emergency Wage Subsidy which is taxable. The main characteristics of this subsidy are as follows:

- a) This taxable subsidy will be retroactive to March 15, 2020.
- b) And will last 24 weeks, ending on August 29, 2020.
- c) The subsidy amount for a given employee on eligible remuneration paid between March 15 and June 6, 2020 would **be the greater of**:
  - 75% of the amount of remuneration paid, up to a maximum benefit of \$847 per week;
  - The lesser of :
    - the amount of remuneration paid, up to a maximum benefit of \$847 per week;

OR

• 75% of the employee's **pre-crisis weekly remuneration** <sup>3</sup> which is the average weekly remuneration paid between January 1 and March 15 inclusive, excluding any seven-day period in respect of which the employee did not receive remuneration. This doesn't apply to new employees.

Example: An employee was paid \$1 000 weekly prior to the crisis. Due to COVID-19, his employer keeps him as an employee but pays him only \$750 per week. In this situation, the subsidy received by the employer will be equal to its expenses of \$ 750 per week. The calculations are as follow:

The greater of the following (with a maximum of \$847 \$ per week):

(A)	75% of	the amount of remuneration paid (MAX : \$ 847) :	\$ 563
	<u>OR</u>		
(B)	The les	ser of :	
	a.	Remuneration paid :	\$ 750
	b.	75% of the pre-crisis remuneration paid :	\$ 750

*In this case, the greater of (A) and (B) is \$750 since it does not exceed the weekly maximum of \$847.* 

A special rule will apply to employees that do not deal at arm's length with the employer. The subsidy amount for such employees will be limited to the eligible remuneration paid in any pay period between March 15 and June 6, 2020, up to a maximum benefit of \$847 per week or 75% of the employee's pre-crisis weekly remuneration. In other words, this means that an employee that does not deal at arm's length, which was not paid by wages before the crisis, will not qualify as an eligible employee and will not receive any subsidy.

<sup>&</sup>lt;sup>3</sup> This measure is ensuring that the wage subsidy only applies if there was a wage paid prior to the start of the program and that remuneration cannot be increased in the qualifying period to maximize the benefit.



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- d) Under certain circumstances, if an employer decides to keep paying a salary to his employees that are currently not working, a new tax measure is also available. To be eligible, **all of the following conditions** must be respected:
  - The employee is paid for at least one week in which he doesn't work.
  - The employee is neither in vacation or sick leave.
  - The employee is not eligible for the CERB which means the employee have not been without remuneration for more than 14 consecutive days in the eligibility period of 4 weeks.

In such circumstances, the employer will be eligible for a refund. This refund would cover **100% of employer-paid contributions for eligible employees** for each week throughout which those employees are on leave with pay and for which the employer is eligible to claim for the CEWS for those

- e) The pre-crisis weekly remuneration for a given employee will consist of the weekly average paid from January 1, 2020 to March 15, 2020, with the exclusion of any 7 consecutive days without remuneration.
- f) This subsidy will also interact with other tax initiative previously announced:
  - An employer would not be eligible to claim the Canada Emergency Wage Subsidy for remuneration paid to an employee in a week that falls within a fourweek period for which the employee is eligible for the Canadian Emergency Response Benefit. (\$2 000).
  - This subsidy will also be reduced from any amount received from the 10% wage subsidy previously announced. However, a new election is available to employer that qualifies to both to reduce the 10% subsidy to 0% so that instead of claiming both, only the CEWS is claimed.
  - This subsidy will reduce the salary expenses used to compute other tax credit (i.e.: research and development).

From April 27, 2020 and as long as their applications are received before February 2021, qualifying entities will be able to apply for the Canada Emergency Wage Subsidy through the CRA "*My Business Account Portal*" or from a web-based application every month. Employers will have to attest of their eligibility upon applying and the payment should be made within weeks. CRA announced that serious penalties will be triggered if employers claim the subsidy without complying with the eligibility criteria.



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## 3. Temporary Wage Subsidy for Employers (10%)

The **10% temporary wage subsidy for employers** announced on March 18, 2020 is **still available** for the employers meeting the criteria listed below. Some business that would not be eligible for the 75% subsidy can still claim the temporary wage subsidy of 10%.

You are an eligible employer if you meet all of these conditions:

- a) You are a non-profit organization, registered charity, or a Canadian-controlled private corporation (CCPC).
  - CCPC are only eligible if their taxable capital employed in Canada for the previous taxation year on an associated group basis, is less than \$15 000 000.
  - Partnerships are also eligible if all of their members are eligible employers.
- b) Have an existing business number and payroll program account with the CRA on March 18, 2020.
- c) And pay salary, wages, bonuses or other remuneration to an employee.

Please note that if the business is closed and no salary, wages, bonuses, or other remuneration is paid to an employee between March 18, 2020 and June 20, 2020, no subsidy can be received, even if you are an eligible employer, because the last criteria is not met.

Each employer will be responsible for **calculating its subsidy itself**. It must be done for each employer. The subsidy is equal to the littlest of the following three elements:

- a) 10% of the remuneration you pay between March 18, 2020 and June 20, 2020.
- b) Up to \$1 375 per employee.
- c) Maximum of \$25 000 total per employer.

**The subsidy is taxable.** If you receive the subsidy, you have to report the total amount as income in the year in which the subsidy is received.

No **amount will be paid directly** to the eligible employer by the CRA. This amount of subsidy will rather be applied as a reduction of the current remittance as an employer of federal income tax to be sent to the CRA. You could continue reducing future federal income tax remittances, up to the maximum of \$25 000, for all remuneration paid before June 20, 2020. More specifically, from March 18, 2020 to June 20, 2020, each eligible employer will have to:

- a) Calculate, for each remittance period, the maximum amount of subsidy to which he is entitled.
- b) Continue deducting income tax, CPP or QPP contributions, Employment Insurance premiums from salary, wages, bonuses or other remuneration, as he currently does.
- c) While calculating the amount to be remitted on a periodic basis, the federal income tax will be reduced by the amount of subsidy established.
  - If the income taxes you deduct are not sufficient to offset the value of the subsidy in a specific period, you can reduce future remittances to benefit from the



subsidy. This includes reducing remittances that may fall outside of the application period for the wage subsidy (after June 20, 2020).

 If the total of subsidy amount has not been applied in reduction of the federal income tax payments, at the end of the calendar year 2020, the employer will be able to ask for a reimbursement or to transfer it to the next year's remittance.

Important reminder: The subsidy cannot be applied as a reduction of the CPP/QPP contributions or of Employment Insurance premiums. These remain unchanged.

On May 20, 2020, CRA announced that it will not be possible for the employers eligible for both the 10% and the 75% CEWS to elect, when the file their CEWS claim, that the 10% subsidy is nil. That way, they will only have the claim the full 75% CEWS instead of reducing it by 10% and claiming the other subsidy independently.

## 4. Canada Emergency Commercial Rent Assistance (CECRA)

Canada Emergency Commercial Rend Assistance (CECRA) provides relief for small businesses experiencing financial hardship du to COVID-19. It offers unsecured, **forgivable loans to eligible commercial property owners** in order to reduce their commercial loss incurred in some of the tenants are unable to pay their rent.

To qualify for CECRA for small businesses, the **commercial property owner** must:

- a) Own commercial real property<sup>4</sup> which is occupied by one or more "**impacted small business tenants**", which is a tenant that respect all the following criteria's :
  - Pay no more than \$50 000 in monthly gross rent per location (as defined by a valid and enforceable lease agreement)
  - Generate **no more than \$20 million in gross annual revenues**, calculated on a consolidated basis (at the ultimate parent level) ;
  - Have experienced an average decline in revenues of 70% or more for the 3months period covering April, May and June 2020 compared to the same period the previous year.
  - If the small business was not open during April June 2019, they can compare their average gross revenues for April, May and June to also use an average of their gross revenues earned in January and February of 2020.

We highly recommend to owners to obtain a copy of their tenants' financial statements for the 3-months period covering April, May and June 2020 with comparative figures for the same period the previous year. These financial results should be certified by a chartered professional accountant.

In this way, as owner, you may get confirmation that your tenant has effectively experienced an average decline in revenues of 70 % or more. Otherwise, if you receive the CECRA and that afterwards, it's discovered that the criterion of average decline in revenue is not met by your tenant, you will have to reimburse the full

<sup>&</sup>lt;sup>4</sup> Commercial real property is defined as a commercial property with small business tenants. Commercial properties with a residential component and multi-unit residential mixed-use properties would equally be eligible with respect to their small business tenants.



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amount of CECRA received. You will find yourself paying 75 % of the rent reduction granted to you tenant.

- b) Landlords and tenants who are not at arm's length will be included in the program as long as there was a valid and enforceable lease agreement in place and the rent under the lease is at market rates.
- c) Enter (or have already entered) into a **legally binding rent reduction agreement** for the period of **April, May and June 2020**, reducing an impacted small business tenant's rent **by at least 75%.** 
  - The rent reduction agreement must include a moratorium on eviction for the period during which the property owner agrees to apply the loan proceeds and;
  - A declaration of rental revenue is to be included in the attestation.
  - If the owner files for bankruptcy, restructure, reorganize or dissolve his business, the loan must be pay back.
  - In the event of default, CMHC has full recourse to recover the CECRA funding from the property owner (individual).

Here is a list of documents to be provided by the owner while applying for the CECRA:

- Property Owner Attestation. For more information: <u>https://assets.cmhc-schl.gc.ca/sites/cmhc/finance-investing/covid19-cecra-small-business/property-owner-attestation-en.pdf?rev=3b79211b-b357-446f-bf21-1c3184fc43dc</u>
- Tenant or Sub-Tenant Attestation from each impacted tenant. For more information :<u>https://assets.cmhc-schl.gc.ca/sites/cmhc/finance-investing/covid19-cecra-small-business/tenant-subtenant-attestation-en.pdf?rev=0baa501f-6b99-4842-993b-0ab1e4b3a808</u>
- Rent Reduction Agreement for each impacted tenant. For more information : <u>https://assets.cmhc-schl.gc.ca/sites/cmhc/finance-investing/covid19-cecra-small-</u> <u>business/sample-rent-reduction-agreement-en.pdf?rev=ae6d0bc7-6867-4101-8e0d-</u> <u>29d72200db7f</u>
- Rent Roll for impacted tenants of the property (only required for properties with more than 5 impacted tenants)
- Property tax statement for the commercial property
- Tenant / sub-tenant information (total number of full and part-time employees)
- Copy of recent bank account statement for the subject property (this account is where the funds will be deposited)
- Tenant / sub-tenant business number
- Property owner's tax registration number



Once the **eligible commercial property owners** have determined which their impacted small business tenants are, and once the rent reduction is granted, the **forgivable loan** will be claimable.

- a) The forgivable loan granted under CECRA represents **50% of the pre-reduction monthly rent payable** by the impacted small business tenant for the months of April, May and June 2020.
  - Since the owner must reduce the rent by 75% in order to qualify for CECRA, its financial loss will be capped at 25% of the usual rent payable.
- b) Owner must apply for all 3 months at the same time and all **impacted small business tenant** must be included in a single application.
- c) Property owners may still apply for assistance once the 3-months period has ended if the can prove the eligibility during those months; **the program will be applied retroactively**.
- d) Property owners must use the funds for CECRA for small businesses to refund amounts in excess of 25% paid by the small business tenant for the period or, at the option of the impacted tenant, apply rent paid in excess of 25% to future rend owing by the impacted tenant.
- e) The loan will be forgiven if the property owner complies with all applicable program terms and conditions **including to not recovering forgiven rent**, at any time.
- f) On June 8, 2020, the Government of Quebec has announced that he will compensate 50 % of the loss of the commercial owners, who had to commit to absorb a loss of 25 % of their rental income by enrolling to the CECRA program. Owners will then receive an amount equivalent to 12.5 % of the total cost of their rent, in order to reduce their losses by half. The terms of application have not yet been made public.
- g) On June 29, 2020, the Government of Canada has announced an extension of the CECRA program to cover the month of July 2020. Only tenants who are already qualified for CECRA for April, May and June will be eligible for the July extension without reassessing whether they continue to have a 70 % or more revenue decline in July 2020. Participation in the one month extension is voluntary.

The property owners can apply for the CECRA on Société canadienne d'hypothèques et de logement website from May 25, 2020 to August 31, 2020. The website link is: <a href="https://www.cmhc-schl.gc.ca/en/finance-and-investing/covid19-cecra-small-business">https://www.cmhc-schl.gc.ca/en/finance-and-investing/covid19-cecra-small-business</a>



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## 5. Canada Emergency Business Account (CEBA)

This new measure will provide interest-free loans of up to \$40 000 to small businesses and non-for-profits, to help cover their **operating costs** during a period where their revenues have been temporarily reduced, due to the economic impacts of the COVID-19 virus.

To qualify, these organizations must meet all of the following conditions:

- a) Have paid between \$20,000 and \$1,500,000 in total employment income in the 2019 calendar year. To qualify under expanded eligibility rules, CEBA applicants with employment income lower than \$20,000 will need:
  - A business operating account at a participating financial institution.
  - A Canada Revenue Agency business number and to have filed a 2018 or 2019 tax return.
  - Eligible non-deferrable expenses between \$40,000 and \$1,500,000 (including such as rent, property taxes, utilities and insurance)
- b) Be a Canadian operating business in operation as of March 1, 2020.
- c) Have a federal tax registration.
- d) Have an active business chequing/operating account with a participating financial institution opened on or prior to March 1, 2020
- e) Not be in arrears on existing borrowing facilities with its financial institution by 90 days or more as at March 1, 2020.
- f) Have not previously used the Program and will not apply for support under the Program at any other financial institution.
- g) Acknowledge its intention to continue to operate its business or to resume operations.
- h) Not a government organization, non-profit organization, religious organization, or an entity wholly-owned by such an organization. Not owned by any Federal Member of Parliament or Senator.
- i) It does not promote violence, incite hatred or discriminate on the basis of sex, gender identity or expression, sexual orientation, color, race, ethnic or national origin, religion, age or mental or physical disability, contrary to applicable laws.

On May 19, 2020, the Government announced an expansion to the eligibility criteria for the CEBA. The program will now be available to a greater number of businesses that are sole proprietors receiving income directly from their businesses, businesses that rely on contractors and family-owned corporations that pay employees through dividends rather than payroll.

Furthermore, the federal government said last May that they were working to refine the CEBA, which currently excludes companies that operate through a personal bank account rather than commercial bank accounts as well as new enterprises.



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Repaying the balance of the loan on or before December 31, 2022 will result in loan forgiveness of 25% (up to \$10 000). If the loaned funds are not paid back by this date, the loan can be converted into term loan with a 5% interest rate. The full loan balance and all interest accrued will then be due on December 31, 2025.

The funds from this loan shall only be used by the Borrower to pay non-deferrable operating expenses of the Borrower including, without limitation, payroll, rent, utilities, insurance, property tax and regularly scheduled debt service, and may not be used to fund any payments or expenses such as prepayment/refinancing of existing indebtedness, payments of dividends, distributions and increases in management compensation.

Small businesses and not-for-profits should contact their financial institution to apply for these loans. For CEBA applicants with employment income lower than \$20,000 that meet the other eligibility requirements, applications are accepted since June 26, 2020.

### 6. Additional Measures for Businesses

Please find below a list of additional measures from the federal and Quebec governments:

- a) The Bank of Canada has reduced the interest rate.
- b) Canada's large banks support will include **up to a 6-month payment deferral for mortgages** and the opportunity for relief on other credit products.
- c) Concerted Temporary Action Program for Businesses. This new financial assistance program, offered by Investissement Québec, is available for businesses, operating in Quebec, that are facing temporary cash flow issues and liquidity shortage stems as a result of COVID-19. More details on this program may be found on the Investissement Quebec website: <u>https://www.investquebec.com/quebec/en/fin</u> <u>ancial-products/all-our-solutions/Concerted-temporary-action-program-forbusinesses.html</u>
- d) Suspension of All Activities for 3 Weeks

Please note that the suspension of all activities carried on in work environments for a period of 3 weeks from March 24, 2020 doesn't entail the obligation for the employers to issue a record of employment to its employees.

e) On July 15, 2020, the Government of Quebec announced that there will be an adjustment to the calculation of employee remunerated hours which is used when calculating the small business deduction. Therefore, if all or part of the corporation's taxation year is included in the period from March 15, 2020 to June 29, 2020, the numbers of hours for the taxation year is deemed to be equal to the result of the following calculation: the number of remunerated hours of the corporation's employees for the taxation year multiplied by the ratio of 365 to the number of days in the taxation year that are not included in the period. The adjustment does not apply to the number of remunerated hours calculated for the preceding taxation year. The adjustments also apply to partnerships.



## SCHEDULE OF NEW DEADLINES FOR FILING AND PAYMENT

INDIVIDUALS			
	Deadline	New deadline (**)	
Filing of tax returns for the 2019 taxation year			
Deadline for individuals not operating a business	April 30, 2020	June 1, 2020 (*****)	
<ul> <li>Deadline for individuals who operate a business (or their spouse)</li> </ul>	June 15, 2020	June 15, 2020	
<ul> <li>Deadline for individuals who died between January 1, 2019 and October 31, 2019 inclusive (****)</li> </ul>	April 30, 2020	June 1, 2020(*****)	
<ul> <li>Deadline for individuals who died between after October 31, 2019 and before June 1, 2020 (****)</li> </ul>	The later between April 30, 2020 or six months after the day of death	The later between June 1, 2020 or six months after the day of death	
Filing of any elections, forms and schedules that must be filed with the return	To be filed with the return	To be filed with the return	
Payment deadline			
<ul> <li>Payment of any balance due for the 2019 taxation year for all individuals except for individuals who died after October 31, 2019 and before June 1, 2020 (****)</li> </ul>	April 30, 2020	September <mark>30</mark> , 2020	
<ul> <li>Payment of any balance due for the 2019 taxation year for all individuals who died after October 31, 2019 and before June 1, 2020 (****)</li> </ul>	The later between April 30, 2020 or six months after the day of death	The later between September 1, 2020 or six months after the day of death	
• Payment of tax instalment due on June 15, 2020	June 15, 2020	September 30, 2020	
<ul> <li>Payment of tax instalment due on September 15, 2020</li> </ul>	September 15, 2020	September 30, 2020	
<ul> <li>Payment of tax instalments due December 15, 2020</li> </ul>	December 15, 2020	No modification	

(\*) Please note that the calculation methods normally used to establish instalments to be paid are still the same.

(\*\*) Unless otherwise stated, new deadlines are the same for Federal and Quebec.

(\*\*\*) Quebec has chosen the date of March 17, 2020 instead of March 18, 2020.

(\*\*\*\*) Quebec has chosen the date of November 30, 2019 instead of October 31, 2019

(\*\*\*\*\*) Penalties and interests will not be applied if returns are files and payment are made by September 30, 2020

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TRUSTS ( other than specified investment flow-through (SIFT) trust)		
	Deadline	New deadline (**)
Filing of tax returns		
For trusts with a December 31 taxation year-end	March 30, 2020	May 1, 2020 (*****)
• For trusts that would otherwise have a filing due date after March 30, 2020 and before May 31, 2020	Within 90 days of the taxation year-end	June 1, 2020 (*****)
<ul> <li>For trusts that would otherwise have a filing due date on May 31, 2020, or in June, July or August 2020</li> </ul>	Within 90 days of the taxation year-end	September 1, 2020
Filing of any elections, forms and schedules that must be filed with the return	To be filed with the return	To be filed with the return
Payment deadlines		
<ul> <li>Payment of any balance due as of March 18, 2020 and before September 1, 2020 (***)</li> </ul>	Within 90 days of the taxation year-end	September 30, 2020
<ul> <li>Payment of tax instalment due on June 15, 2020</li> </ul>	June 15, 2020	September 30, 2020
<ul> <li>Payment of tax instalment due on September 15, 2020</li> </ul>	September 15, 2020	September 30, 2020
<ul> <li>Payment of tax instalments due December 15, 2020</li> </ul>	December 15, 2020	No modification

(\*) Please note that the calculation methods normally used to establish instalments to be paid are still the same.

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(\*\*\*) Quebec has chosen the date of March 17, 2020 instead of March 18, 2020.

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CORPORATION		
	Deadline	New deadline (**)
Filing of corporate tax returns		
• for corporations that would otherwise have a filing due date after March 18, 2020 and before May 31, 2020 (***)	Within 6 months of the taxation year-end	June 1, 2020 (*****)
<ul> <li>for corporations that would otherwise have a filing due date on May 31, or in June, July and August</li> </ul>	Within 6 months of the taxation year-end	September 1, 2020
Filing of any elections, forms and schedules that must be filed with the return	To be filed with the return	To be filed with the return
Payment deadline		
• Payment for any income tax balance due before March 18, 2020 (***)	Within 2 months of the taxation year-end	No modifications
• Payment for any tax balance due for the period between March 18, 2020 and August 31, 2020, inclusive (***)	Within 2 months of the taxation year-end (or within 3 months for corporations eligible for federal CCPC status)	September 30, 2020
• Payment for any tax instalments due for the period between March 18, 2020 and August 31, 2020, inclusive (***)	Monthly or quarterly	September 30, 2020
• Form T1134 « <i>Information Return Relating To Controlled and Not-Controlled Foreign Affiliates</i> » whose due date falls within the period beginning after March 18, 2020 and ending before June 1, 2020	Within 15 months of the taxation year- end	June 1, 2020

(\*) Please note that the calculation methods normally used to establish instalments to be paid are still the same.

(\*\*) Unless otherwise stated, new deadlines are the same for Federal and Quebec.

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(\*\*\*\*) Quebec has chosen the date of November 30, 2019 instead of October 31, 2019 (\*\*\*\*\*) Penalties and interests will not be applied if returns are files and payment are made by September 30, 2020

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PARTNERSHIPS		
	Deadline	New deadline (**)
Filing of information return		
For partnerships all of which members are individuals	March 31, 2020	May 1, 2020
• For partnerships all of which members are corporations and that would otherwise have a filing due date on March 31, 2020	Within 5 months of the taxation year-end	May 1, 2020
• For partnerships all of which members are corporations and that would otherwise have a filing due date after March 31, 2020 and before May 31, 2020	Within 5 months of the taxation year-end	June 1, 2020
• For partnerships all of which members are corporations and that would otherwise have a filing due date on May 31, or in June, July and August 2020.	Within 5 months of the taxation year-end	September 1, 2020
REG	SISTERED CHARITIES	
	Deadline	New deadline (**)
Filing of information return		
• For charities with an information return due between March 18, 2020 and December 31, 2020 (***)	Within 6 months of the taxation year-end	On December 31, 2020
	GST/HST/QST	
	Deadline	New deadline (**)
Payment deadline		
For February, March and April 2020 reporting period	Within 1 month of the last day of the reporting period	June 30, 2020
• For quarterly return covering the period January 1, 2020 to March 31, 2020	Within 1 month of the last day of the reporting period	June 30, 2020
For annual return whose due date falls in March, April or May 2020	Within 1 month of the last day of the reporting period	June 30, 2020

<sup>(\*)</sup> Please note that the calculation methods normally used to establish instalments to be paid are still the same.

<sup>(\*\*)</sup> Unless otherwise stated, new deadlines are the same for Federal and Quebec.

<sup>(\*\*\*)</sup> Quebec has chosen the date of March 17, 2020 instead of March 18, 2020.

<sup>(\*\*\*\*)</sup> Quebec has chosen the date of November 30, 2019 instead of October 31, 2019

<sup>(\*\*\*\*\*)</sup> Penalties and interests will not be applied if returns are files and payment are made by September 30, 2020

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OTHERS			
	Deadline	New deadline (**)	
Filing NR4 information returns	March 31, 2020 or within 90 days of the taxation year-end for a trust or an estate	May 1, 2020	
Time limit for filing a notice of objection			
<ul> <li>for any federal notice of objection which shall be filed during the period beginning on March 18, 2020 and ending on June 29, 2020.</li> <li>for any Quebec notice of objection which shall be filed during the period beginning on March 13, 2020 and ending on June 29, 2020.</li> </ul>	of the assessment is sent	June 30, 2020	

(\*) Please note that the calculation methods normally used to establish instalments to be paid are still the same.

(\*\*) Unless otherwise stated, new deadlines are the same for Federal and Quebec.

(\*\*\*) Quebec has chosen the date of March 17, 2020 instead of March 18, 2020.

(\*\*\*\*) Quebec has chosen the date of November 30, 2019 instead of October 31, 2019

(\*\*\*\*\*) Penalties and interests will not be applied if returns are files and payment are made by September 30, 2020