

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

Re: Political Activities Consultation

Dear Agency officials,

I am writing on behalf of the Sudbury Workers Education and Advocacy Centre, an organization of workers, students, and community members committed to improving the lives and working conditions of people in low-wage and unstable employment. Since opening our doors in 2014 we have helped educate workers on their workplace rights, helping many of them reclaim unpaid wages, as well as advocate for decent work and working conditions on behalf of thousands of workers in the north and across Ontario who face increasingly precarious situations at work. Like most non-profits, we too struggle with sustainability and ensuring our Centre remains open to service the needs of the working north. We have recently applied for charitable status with the CRA and if accepted this will only be able to supplement a portion of our services under current laws as our advocacy services are deemed a “political activity” and moneys raised by are charity cannot supplement this. Our advocacy services not only educate a broader audience about their rights at work but also help bring awareness to current issues facing a growing majority of Ontarians, a large portion being vulnerable groups (Indigenous Peoples, Persons with disabilities, Women, Youth, LGBTQ2+, etc.).

We are writing to express support for Imagine Canada’s [political activities brief](#). 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,



Jenny Fortin

Executive Director

Sudbury Workers Education and Advocacy Centre