



September 27, 2016

Tax Policy Branch
Department of Finance
90 Elgin Street
Ottawa, ON K1A 0G5

Dear Sir/Madam:

Re: Legislative and Regulatory Proposals Relating to the GST/HST

I am writing on behalf of the Association of Canadian Pension Management (“ACPM”). ACPM is the informed voice of Canadian retirement income plan sponsors, administrators and their allied service providers. We are a non-profit organization and our objective is to advocate for an effective and sustainable Canadian retirement income system. Our membership represents over 400 companies and retirement income plans that cover more than 3 million plan members.

ACPM appreciates the commitment of the Government of Canada to consult with Canadians on tax-related matters, as evidenced by the consultations on the Legislative and Regulatory Proposals relating to the GST/HST and the GST/HST treatment of certain limited partnerships and investment plans.

ACPM supports clarifying the application of the GST/HST rules to pension master trusts and pension corporations. The proposed changes will also eliminate some double taxation.

We question why the application of the new provisions to master trusts is limited to master trusts described in section 149(1)(o.4) of the Income Tax Act. There are pension master trusts that do not make the election contemplated by that section, and we see no policy reason why they should be treated differently.

In our view, however, the GST/HST rules as they apply to pension plans and pension investment entities remain extraordinarily complex. We encourage the Government to work on simplifying the operation of these rules. Any efforts to simplify compliance and reduce the associated costs would be appreciated by the pension industry.

Yours truly,



Bryan Hocking
Chief Executive Officer
ACPM (The Association of Canadian Pension Management)