



SUBJECT: Index
**Income Tax Interpretation Bulletins and
Technical News**

DATE: December 31, 2006

REFERENCE:

Application

This index reflects interpretation bulletins, special releases, and technical news issued on or before **December 31, 2006**. It cancels and replaces the index of December 31, 2005. The index is updated on an annual basis.

General Comments

¶ 1. The purpose of interpretation bulletins (ITs) is to provide the Canada Revenue Agency's (CRA) interpretation of the income tax law that it administers and to announce significant changes in the CRA's interpretations and their effective dates. Interpretation bulletins are not law; the law is contained in the Acts themselves and in the Regulations. However, these bulletins can generally be relied upon as reflecting the CRA's interpretation of the law to be applied on a consistent basis by its staff.

¶ 2. Due to their technical nature, ITs are used primarily by the CRA staff, tax specialists, and other individuals who have an interest in tax matters. An ongoing effort is made to improve the readability of the bulletins while still maintaining technical precision and accuracy. For example, all new and revised bulletins are written using plain language writing techniques. Each bulletin has a summary that provides a clear overview of the contents of the particular bulletin and an *Explanation of Changes* that is provided to assist readers in understanding the reasons for the revisions to a bulletin. In addition, the bulletins include, where appropriate, references to relevant case law and other CRA publications as well as examples to illustrate how the law is applied. For those readers who prefer a less technical explanation of the law, the CRA offers other publications, such as tax guides and brochures.

¶ 3. Bulletins reflect the CRA's interpretation of the law in force at the time the bulletins are published. Since there are frequent legislative amendments, there is an ongoing effort to ensure that the bulletins are complete, accurate, and up-to-date. However, the timeliness of any revisions that may be required is affected by the frequency and extent of the legislative changes. In cases where a bulletin has not yet been revised to reflect legislative changes, readers should refer to the amended law and its effective date. Readers should also take into account court decisions since the date of publication of a bulletin when considering the relevancy of the comments in the bulletin or special release.

¶ 4. When an existing bulletin needs updating, the CRA will either revise the bulletin or issue a consolidated version to revise parts of the bulletin, depending on the nature and extent of the change and its overall effect on the existing bulletin.

¶ 5. An interpretation described in a bulletin applies as of the date the bulletin is published, unless otherwise specified. When there is a subsequent change in a previous interpretation or position, and the change is beneficial to taxpayers, it is usually effective for all future assessments and reassessments. However, if the change is not favourable to taxpayers, it is normally effective for the current and subsequent taxation years or for transactions entered into after the date of the bulletin.

¶ 6. A change in an interpretation or position may also be announced in the *Income Tax Technical News*. This newsletter is issued ad hoc to provide immediate CRA reaction to specific issues of significant impact.

Complete Review of an IT

¶ 7. When there has been a complete review of all paragraphs of an IT, the number identifying the IT changes (e.g., IT-426 becomes IT-426R and, upon a subsequent review, it will become IT-426R2). The *Explanation of Changes* section at the end of the IT indicates the paragraph numbers that have been changed as a result of the review and provides a short explanation of the reasons for the changes.

Consolidated IT

¶ 8. In some situations, such as when there has been a substantial change in the law or a significant court case, only certain paragraphs of an IT are revised in order to update it as quickly as possible. When such is the case, the word "(Consolidated)" will appear at the end of the IT number (e.g., IT-481 (Consolidated)). The paragraphs that have been revised by the current consolidation are identified at the front of the IT beside the heading *Latest Revisions*. The reasons for all of the changes made since the last complete review of the IT are indicated in the *Bulletin Revisions* section at the end of the IT. The date of the revision appears after the description of each change.

¶ 9. This index consists of the following:

- Part 1 – Sectional Index by Primary References
- Part 2 – Topical Index
- Part 3 – Numerical Listing of Current Interpretation Bulletins
- Part 4 – Numerical Listing of Technical News
- Part 5 – List of Cancelled Bulletins Since the Last Publication of the Index

Note: Throughout this index, bulletins for which the CRA has issued a special release are indicated by an “(SR)” placed to the right of the bulletin number. Also, consolidated versions of bulletins are indicated by a “(C)” placed to the right of the bulletin number. In Part 3, an underlining of the number of a bulletin indicates that a new release, a revision or a consolidated version has been issued since the index was last published. Cancelled and archived publications are not listed in the index.

To better serve our clients, the CRA consults with many affected groups and individuals about the content of selected bulletins. If you have any comments or suggestions to improve a bulletin, a technical news, or this index, we would like to hear from you. Please send your comments to:

*Income Tax Rulings Directorate
Legislative Policy and Regulatory Affairs Branch
Canada Revenue Agency
Ottawa ON K1A 0L5*

*All Interpretation Bulletins can be found on the Canada Revenue Agency Web site at:
www.cra.gc.ca/menu/EmenuKLA.html*

Part 1 – Sectional Index

by Primary References

Income Tax Act

Income Tax Act Section	Title	Bulletin or Technical News	Income Tax Act Section	Title	Bulletin or Technical News
2	Determination of an individual's residence status	IT-221R3(C)	6(1.1)	Benefits, including standby charge for an automobile, from the personal use of a motor vehicle supplied by an employer – After 1992	IT-63R5
2(1)	Residence of a trust or estate	IT-447	6(2), (2.1)	Benefits, including standby charge for an automobile, from the personal use of a motor vehicle supplied by an employer – After 1992	IT-63R5
3	Price adjustment clauses	IT-169	6(3)	Payments by employer to employee	IT-196R2(SR)
3	Separate businesses	IT-206R	6(6)	Employment at special work sites or remote work locations	IT-91R4
3	Miscellaneous receipts	IT-334R2	6(7)	Benefits, including standby charge for an automobile, from the personal use of a motor vehicle supplied by an employer – After 1992	IT-63R5
3	Damages, settlements, and similar receipts	IT-365R2	7	Benefits to employees – Stock options	IT-113R4
3	Non-residents – Income earned in Canada	IT-420R3(SR)	8(1)(c)	Clergy Residence Deduction	IT-141R(C)
3	Rental of real property by individual	IT-434R(SR)	8(1)(f)	Vehicle, travel and sales expenses of employees	IT-522R
3	Barter transactions	IT-490	8(1)(h), (h.1)	Vehicle, travel and sales expenses of employees	IT-522R
3(a)	Gains from theft, defalcation or embezzlement	IT-256R	8(1)(i)(i)	Employees' professional membership's dues	IT-158R2
3(d)	Losses – Their deductibility in the loss year or in other years	IT-232R3	8(1)(i)(ii), (iii)	Employee's expenses, including work space in home expenses	IT-352R2
6	Athletes and players employed by football, hockey and similar clubs	IT-168R3	8(1)(i)(iv), (vi)	Dues paid to a union or to a parity or advisory committee	IT-103R
6(1)(a)	Benefits, including standby charge for an automobile, from the personal use of a motor vehicle supplied by an employer – After 1992	IT-63R5	8(1)(j)	Vehicle, travel and sales expenses of employees	IT-522R
6(1)(a)	Health and welfare trusts for employees	IT-85R2	8(1)(m)	Registered pension funds or plans – Employees' contributions	IT-167R6
6(1)(a)	Employee fringe benefits	IT-470R(C)	8(1)(p), (q)	Performing artists	IT-525R(C)
6(1)(a)	Flexible employee benefit programs	IT-529	9	Conversion of property, other than real property, from or to inventory	IT-102R2
6(1)(e), (e.1)	Benefits, including standby charge for an automobile, from the personal use of a motor vehicle supplied by an employer – After 1992	IT-63R5	9	Corporations used by practising members of professions	IT-189R2
6(1)(f)	Wage loss replacement plans	IT-428			
6(1)(g), (h)	Employee benefit plans and employee trusts	IT-502(SR)			
6(1)(k), (l)	Benefits, including standby charge for an automobile, from the personal use of a motor vehicle supplied by an employer – After 1992	IT-63R5			

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Income Tax Act Section	Title	Bulletin or Technical News	Income Tax Act Section	Title	Bulletin or Technical News
9	Profits, capital gains and losses from the sale of real estate, including farmland and inherited land and conversion of real estate from capital property to inventory and vice versa	IT-218R	12(1)(o)	Safe income calculation –The <i>Kruco</i> case	TN-34
			12(1)(x)	Government assistance – General comments	IT-273R2
			12(1)(x)	<i>Application of paragraph 12(1)(x)</i>	TN-29
9	Government assistance – General comments	IT-273R2	12.2	Policyholders' income from life insurance policies	IT-87R2
9	Commodity futures and certain commodities	IT-346R	13(1)	Capital cost allowance – Recapture and terminal loss	IT-478R2
9	Woodlots	IT-373R2(C)	13(4), (4.1)	Exchanges of property	IT-259R4
9	Payments to lottery ticket vendors	IT-404R	13(5)	Capital cost allowance – Transferred and misclassified property	IT-190R2
9	Prepaid expenses and deferred charges	IT-417R2	13(5.1)	Capital cost allowance – Leasehold interests	IT-464R
9	Visual artists and writers	IT-504R2(C)	13(6)	Capital cost allowance – Transferred and misclassified property	IT-190R2
9(1)	Income of contractors	IT-92R2			
9(1)	Foreign exchange gains and losses	IT-95R	13(7.1)	Government assistance – General comments	IT-273R2
9(1)	Lawyers' trust accounts and disbursements	IT-129R	13(21)	Capital cost allowance – Depreciable property	IT-128R
9(1)	Surface rentals and farming operations	IT-200	13(21)	Sale of property – When included in income computation	IT-170R
9(1)	Prepayment of rents	IT-261R			
9(1)	Premiums and other amounts with respect to leases	IT-359R2	13(21)	Capital cost allowance – Proceeds of disposition of depreciable property	IT-220R2(SR)
9(1)	Miscellaneous farm income	IT-425			
9(1)	Business transactions prior to incorporation	IT-454	13(21)	Capital cost allowance – Partial dispositions of property	IT-418
9(1)	Prepaid income – Whether subsection 9(1) or paragraph 12(1)(a) applies	TN-30	13(21)	Dispositions – Absence of consideration	IT-460
10	Inventory valuation	IT-473R	13(21)	Timber resource property and timber limits	IT-481©
10(4), (5)	Supplies on hand at the end of a fiscal period	IT-51R2(SR)	13(21.1)	Capital cost allowance – Proceeds of disposition of depreciable property	IT-220R2(SR)
12(1)(a)	Prepaid income – Whether subsection 9(1) or paragraph 12(1)(a) applies	TN-30	14	Disposition of and transactions involving eligible capital property	IT-123R4
12(1)(b)	Sale of property – When included in income computation	IT-170R	14	Transactions involving eligible capital property	IT-123R6
12(1)(c)	Interest income	IT-396R	14(1), (5)	Eligible capital amounts	IT-386R
12(1)(g)	Payments based on production or use	IT-462	14(5)	Meaning of eligible capital expenditure	IT-143R3
12(1)(j)	Taxable dividends from corporations resident in Canada	IT-67R3	14(6), (7)	Exchanges of property	IT-259R4
			15(1)	Benefits conferred on shareholders	IT-432R2
12(1)(o)	Crown charges – Resources properties in Canada	IT-438R2	15(1)	Single-purpose corporations	TN-31R2

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Income Tax Act Section	Title	Bulletin or Technical News	Income Tax Act Section	Title	Bulletin or Technical News
15(1)(c)	Rights to buy additional shares	IT-116R3	18(12)	Work space in home expenses	IT-514
15(2)	Debts of shareholders and certain persons connected with shareholders	IT-119R4	20(1)(a)	Capital cost allowance – Buildings or other structures	IT-79R3
18(1)	Expenses of training	IT-357R2	20(1)(a)	Capital cost allowance – Depreciable property	IT-128R
18(1)(a)	Legal and accounting fees	IT-99R5(C)	20(1)(a)	Capital cost allowance – Accelerated write-off of manufacturing and processing machinery and equipment	IT-147R3
18(1)(a)	Deductibility of fines or penalties	IT-104R3	20(1)(a)	Capital cost allowance – Vessels	IT-267R2
18(1)(a)	Losses from theft, defalcation or embezzlement	IT-185R(C)	20(1)(a)	Capital cost allowance – General comments	IT-285R2
18(1)(a)	Membership dues – Associations and societies	IT-211R	20(1)(a)	Condominiums	IT-304R2
18(1)(a)	Prepayments of rents	IT-261R	20(1)(a)	Capital cost allowance – Contractor's movable equipment	IT-306R2
18(1)(a)	Commencement of business operations	IT-364	20(1)(a)	Definition of tools	IT-422
18(1)(a)	Damages, settlements and similar payments	IT-467R2	20(1)(a)	Capital cost allowance – Leasehold interests	IT-464R
18(1)(a)	Expenditures on research and for business expansion	IT-475	20(1)(a)	Capital cost allowance – Earth-moving equipment	IT-469R
18(1)(a)	General limitation on deduction of outlays or expenses	IT-487	20(1)(a)	Capital cost allowance – Class 8 property	IT-472(SR)
18(1)(a)	Motor vehicle expenses claimed by self-employed individuals	IT-521R	20(1)(a)	Capital cost allowance – Gas and oil exploration and production equipment	IT-476
18(1)(b)	Customer lists and ledger accounts	IT-187	20(1)(a)	Capital cost allowance – Patents, franchises, concessions and licences	IT-477(C)
18(1)(b)	Damages, settlements and similar payments	IT-467R2	20(1)(a)	Cost of clearing or levelling land	IT-485
18(1)(b)	Expenditures on research and for business expansion	IT-475	20(1)(a)	Capital cost allowance – Industrial mineral mines	IT-492
18(1)(c), (e)	Damages, settlements and similar payments	IT-467R2	20(1)(a)	Capital cost allowance – Logging assets	IT-501(SR)
18(1)(e)	Prepaid income – Whether subsection 9(1) or paragraph 12(1)(a) applies	TN-30	20(1)(c)	Interest deductibility and related issues	IT-533
18(1)(h)	Damages, settlements and similar payments	IT-467R2	20(1)(c)(ii)	Income trust and interest deductibility	TN-34
18(1)(l)	Recreational properties and club dues	IT-148R3	20(1)(e)	Expenses of issuing or selling shares, units in a trust, interests in a partnership or syndicate, and expenses of borrowing money	IT-341R3
18(1)(m)	Crown charges – Resource properties in Canada	IT-438R2	20(1)(e.1)	Expenses of issuing or selling shares, units in a trust, interests in a partnership or syndicate, and expenses of borrowing money	IT-341R3
18(2), (2.2)-(2.5), (3)	Land developers – Subdivision and development costs and carrying charges on land	IT-153R3	20(1)(e.2)	Premiums on life insurance used as collateral	IT-309R2
18(4)	Interest on debts owing to specified non-residents (“thin capitalization”)	IT-59R3			
18(9)	Prepaid expenses and deferred charges	IT-417R2			

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20(1)(f)	Foreign exchange losses	TN-25	37	Scientific research and experimental development expenditures [after December 15, 1987]	IT-151R4
20(1)(f)	Bad debts and reserves for doubtful debts	IT-442R	37	Scientific research and experimental development expenditures [after December 2, 1992]	IT-151R5
20(1)(m)	Prepaid income – Whether subsection 9(1) or paragraph 12(1)(a) applies	TN-30	37(1), (2)	List of “approved” entities for the purpose of scientific research and experimental development	TN-23
20(1)(m)	Reserve for prepaid amount: Impact of the <i>Ellis Vision</i> case	TN-32	39	Transactions in securities	IT-479R(SR)
20(1)(m)-(m.2)	Special reserves	IT-154R	39(1)	Shares sold subject to an earnout agreement	IT-426R
20(1)(n)	Special reserves – Sale of land	IT-152R3	39(1)(a)(i.1)	Dispositions of cultural property to designated Canadian institutions	IT-407R4(C)
20(1)(n)	Special reserves	IT-154R	39(1)(c)	Business investment losses	IT-484R2
20(1)(p)	Bad debts and reserves for doubtful debts	IT-442R	40(2)(b), (c)	Principal residence	IT-120R6
20(1)(q)	Administrative costs of pension plans	IT-105	40(2)(f)	Prizes from lottery schemes, pool system betting and giveaway contests	IT-213R
20(1)(aa)	Cost of clearing or levelling land	IT-485	43	Part dispositions	IT-264R(SR)
20(1)(bb)	Fees paid to investment counsel	IT-238R2	44	Exchanges of property	IT-259R4
20(1)(dd)	Investigation of site	IT-350R	44(1)	Former business property	IT-491(SR)
20(8)	Special reserves – Sale of land	IT-152R3	47	Meaning of “identical properties”	IT-387R2(C)
20(10)	Convention expenses	IT-131R2	48	Deemed disposition and acquisition on ceasing to be or becoming resident in Canada	IT-451R
20(11), (12)	Foreign income taxes as a deduction from income	IT-506	49	Options on real estate	IT-403R
20(16)	Capital cost allowance – Leasehold interests	IT-464R	49(1)(b), (c)	Options granted by corporations to acquire shares, bonds or debentures and by trusts to acquire trust units	IT-96R6
20(16)	Capital cost allowance – Recapture and terminal loss	IT-478R2	49(4)	Reassessment where option exercised in subsequent year	IT-384R(SR)
22	Sale of accounts receivable	IT-188R(SR)	50(1)(a)	Capital debts established to be bad debts	IT-159R3
23	Sale of inventory	IT-287R2	50(2)	Capital debts established to be bad debts	IT-159R3
24	Eligible capital property – Rules where a taxpayer has ceased carrying on a business or has died	IT-313R2	51(1)	Fractional interests in shares	IT-115R2
28	Farming or fishing – Use of cash method	IT-433R	53(1)	Capital property – Some adjustments to cost base	IT-456R(SR)
28	Farming – Cash method inventory adjustments	IT-526	53(1)(e)	Life insurance proceeds received by a private corporation or a partnership as a consequence of death	IT-430R3(C)
28(1)	Livestock of farmers	IT-427R	53(2)	Capital property – Some adjustments to cost base	IT-456R(SR)
30	Cost of clearing or levelling land	IT-485			
31	Farm losses	IT-322R			
31(1)	Restricted farm losses	TN-30			
34	Election by professionals to exclude work in progress from income	IT-457R			

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53(2)(k)	Government assistance – General comments	IT-273R2	56(4)	Transfer of rights to income	IT-440R2
54	Shares entitling shareholders to choose taxable or capital dividends	IT-146R4	59(1)	Dispositions of resource properties	IT-125R4
54	Corporations – Involuntary dissolutions	IT-444R	59(3.2)(c)	Dispositions of resource properties	IT-125R4
54	Dispositions – Changes in terms of securities	IT-448(SR)	59.1	Dispositions of resource properties	IT-125R4
54	Dispositions – Absence of consideration	IT-460	60(b)	Support payments	IT-530R
54	Stock exchange transactions – Date of disposition of shares	IT-133	60(j)	Transfers of funds between registered plans	IT-528
54	Sale of property – When included in income computation	IT-170R	60(j.1)	Retiring allowances	IT-337R4(C)
54	Principal residence	IT-120R6	60(l)	Transfers of funds between registered plans	IT-528
54	Ownership of property (principal residence)	IT-437R	60(q)	Scholarships, fellowships, bursaries, and research grants – Forgivable loans, repayable awards and repayable employment income	IT-340R(SR)
55(1)	Creation of capital losses	TN-34	62	Moving expenses	IT-178R3(C)
55(2)	Income earned or realized – the <i>Kruco</i> case	TN-33	63	Child care expenses	IT-495R3
55(2)	Safe income calculation – The <i>Kruco</i> case	TN-34	64	Medical expense and disability tax credits and attendant care expense deduction	IT-519R2(C)
55(5)(b),(c)	Safe income calculation – The <i>Kruco</i> case	TN-34	66(15)	Exploration and development expenses – Meaning of principal-business corporation	IT-400(SR)
56(1)(a)(i)	Superannuation or pension benefits	IT-499R	66.2(1)	Dispositions of resource properties	IT-125R4
56(1)(a)(ii)	Retiring allowances	IT-337R4(C)	66.2(6)	Dispositions of resource properties	IT-125R4
56(1)(a)(iii)	Death benefits	IT-508R	66.4(6)	Dispositions of resource properties	IT-125R4
56(1)(n)	Scholarships, fellowships, bursaries, prizes, research grants and financial assistance	IT-75R4	67	Reasonableness of shareholder/manager remuneration	TN-30
56(1)(n)	Canada Council grants	IT-257R	67.1	Food, beverages and entertainment expenses	IT-518R
56(1)(o)	Scholarships, fellowships, bursaries, prizes, research grants and financial assistance	IT-75R4	69	Inter vivos gifts of capital property to individuals directly or through trusts	IT-209R(SR)
56(1)(r)	Scholarships, fellowships, bursaries, prizes, research grants and financial assistance	IT-75R4	69(11)	Corporate loss utilisation transactions	TN-30
56(1)(v)	Employees' or workers' compensation	IT-202R2	69(11)	Loss consolidation – Unanimous shareholder agreements	TN-34
56(1)(aa)	Scholarships, fellowships, bursaries, prizes, research grants and financial assistance	IT-75R4	69(11)	Sale of tax losses	TN-34
56(2)	Indirect payments	IT-335R2	70(1)	Income of deceased persons – Periodic payments and investment tax credit	IT-210R2
56(3)	Scholarships, fellowships, bursaries, prizes, research grants and financial assistance	IT-75R4			

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70(2)	Income of deceased persons – Rights or things	IT-212R3(SR)	80.5	Benefits to individuals, corporations and shareholders from loans or debt	IT-421R2
70(2)	Income of deceased persons – Farm crops	IT-234	81(1)(a)	Amounts excluded from income – Statutory exemptions and certain service or RCMP pensions, allowances and compensation	IT-397R(SR)
70(5)	Buy-sell agreements	IT-140R3	81(1)(h)	Application of paragraph 81(1)(h)	TN-31R2
70(5)	Valuation of shares of a corporation receiving life insurance proceeds on death of a shareholder	IT-416R3	81(3)	Taxation of elected officers of incorporated municipalities, school boards, municipal commissions and similar bodies	IT-292
70(5.1)	Eligible capital property – Rules where a taxpayer has ceased carrying on a business or has died	IT-313R2	82(3)	Taxable dividends received after 1987 by a spouse	IT-295R4
70(5.2)	Dispositions of resources properties	IT-125R4	83(2)-(2.4)	Capital dividends	IT-66R6
70(5.3)	Valuation of shares of a corporation receiving life insurance proceeds on death of a shareholder	IT-416R3	84(2)	Meaning of “winding-up”	IT-126R2
70(6), (6.1), (7), (8)	Testamentary spouse trusts	IT-305R4	84.1	Non-arm’s length sale of shares to a corporation	IT-489R
70(9)-(9.3), (10), (13), (14)	Intergenerational transfers of farm property on death	IT-349R3	85(1)	Transfer of property to a corporation under subsection 85(1)	IT-291R3
73(1)	Property transfers after separation, divorce and annulment	IT-325R2	85(3)	Winding-up of a partnership	IT-378R
73(3), (4)	Inter vivos transfer of farm property to child [before 1993]	IT-268R3(SR)	85.1(1), (2), (2.1)	Share for share exchange	IT-450R
73(3), (4)	Inter vivos transfer of farm property to child [after 1992]	IT-268R4	85.1(3), (4)	General anti-avoidance rule and audit issues/concerns	TN-34
74.1(1)	Interspousal and certain other transfers and loans of property	IT-511R	86.1	Foreign spin-offs with “poison pill” shareholder reports plans	TN-28
74.1(2)	Transfers and loans of property made after May 22, 1985 to related minor	IT-510	87	Amalgamations of Canadian corporations	IT-474R
74.2	Interspousal and certain other transfers and loans of property	IT-511R	87(2.1)	Losses of a corporation – The effect that acquisitions of control, amalgamations, and windings-up have on their deductibility – After January 15, 1987	IT-302R3
75(2)	Attribution of trust income to settlor	IT-369R(SR)	88(1)	Meaning of “winding-up”	IT-126R2
76(4)	Deferred cash purchase tickets issued for grain	IT-184R	88(1.1), (1.2)	Losses of a corporation – The effect that acquisitions of control, amalgamations, and windings-up have on their deductibility – After January 15, 1987	IT-302R3
78	Unpaid amounts	IT-109R2	88(2)	Winding-up dividend	IT-149R4
80	Debtor’s gain on settlement of debt	IT-293R(SR)	88.1	Deemed disposition and acquisition on ceasing to be or becoming resident in Canada	IT-451R
80(2)(k)	Foreign exchange losses	TN-25	89(1)	Capital dividends	IT-66R6
80(3)	Settlement of debts on the winding-up of a corporation	IT-142R3	89(1)	Status of corporations	IT-391R
80.4	Benefits to individuals, corporations and shareholders from loans or debt	IT-421R2			

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89(1)	Life insurance proceeds received by a private corporation or a partnership as a consequence of death	IT-430R3(C)	106(2)	Disposition of an income interest in a trust	IT-385R2
89(1)	Paid-up capital	IT-463R2	108(2)(b)	Income trust and subparagraph 132(6)(b)(i)	TN-34
89(1.1), (1.2)	Capital dividends	IT-66R6	110(1)(f)(ii)	Employees' or workers' compensation	IT-202R2
95(1)	Meaning of the term "corporation"	IT-343R	110(2)	Vow of perpetual poverty	IT-86R
95(6)	Scope of application	TN-32	110.1	Gifts and official donation receipts	IT-110R3
95(6)	General anti-avoidance rule and audit issues/concerns	TN-34	110.1	Proposed guidelines on split-receipting	TN-26
95(6)	Update on subsection 95(6)	TN-34	110.1(1)	Gift to a charity of a residual interest in real property or an equitable interest in a trust	IT-226R
95(6)(b)	Update on subsection 95(6)	TN-34	110.1(1)	Gifts in kind to charity and others	IT-297R2
96	Partnerships – Income of non-resident partners	IT-81R	110.1(1)(c)	Dispositions of cultural property to designated Canadian institutions	IT-407R4(C)
96	What is a partnership?	IT-90	110.1(3)	Gifts of capital properties to a charity and others	IT-288R2
96(3)	Election by members of a partnership under subsection 97(2)	IT-413R	111(1)	Losses – Their deductibility in the loss year or in other years	IT-232R3
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– interest payments in foreign currency	IT-361R3	– reduction	IT-291R3
Northern residents		– shifting/creation	
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– exploration and production equipment		– arm's length, meaning	IT-419R2
– capital cost allowance	IT-476	– deceased partners	
– pipelines	IT-482R	– deemed disposition of partnership interest	IT-278R2
– capital cost allowance	IT-476	– income share	IT-278R2
– tax payment	IT-438R2	– receivables, 1971	IT-278R2
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– pension benefits payable to	IT-499R	– business	IT-231R2
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– tax on rents and timber royalties	IT-393R2	– indirect payments	IT-335R2
– partners		– legal and accounting fees	IT-99R5(C)
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Private corporations, Canadian-controlled		– deemed acquisition on becoming resident	IT-451R
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– defined	IT-458R2	– election to exclude or include property	IT-451R
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– employees	IT-113R4	– distribution to employees profit-sharing plans	IT-379R
Private health services plan		– dwelling, ownership defined	IT-437R
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– premiums paid by employer		– exchange, shareholder and corporation	IT-432R2
– employees' fringe benefits	IT-470R(C)	– exchanges	IT-259R4
Privileges and Immunities (NATO) Act		– expropriation	
– exempt income	IT-397R(SR)	– replacement property	IT-259R4
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– fees paid by employer		– former property	
– employees' fringe benefits	IT-470R(C)	– adjustment resulting from the replacement of	IT-259R4
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– corporations used by	IT-189R2	– income tax for non-profit organizations	IT-83R3
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– deceased persons	IT-212R3(SR)	– losses, deductibility	IT-232R3
		– misclassified, capital cost allowance	IT-190R2
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– amalgamation of corporations	IT-474R	– eligible capital amounts received on disposition	IT-386R
– resource – see Property, resource		– eligible capital expenditures	IT-143R3
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– sale on deferred payment basis, special reserves	IT-154R	– inter vivos transfer of farm property to child	IT-268R3(SR); IT-268R4
– stolen or embezzled by shareholder	IT-432R2	– legal and accounting fees	IT-99R5(C)
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– transfer – see Property transfer or loan		– capital cost allowance	IT-285R2
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Property, capital		– bonds, debentures, notes, etc.	IT-387R2(C)
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– cost allowance		– escrowed shares	IT-387R2(C)
– tangible, class 8 property	IT-472(SR)	– fractional interest in shares	IT-115R2
– cost base, adjustment	IT-456R(SR)	– gold bullion and gold certificates	IT-387R2(C)
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– official receipts	IT-96R6	– camps, lodge, yachts, golf courses and facilities – expenses	IT-148R3
– disposition to designated Canadian institutions	IT-407R4(C)	Property, rental	
Property, depreciable		– business or property income	IT-434R(SR)
– acquisition date, effect on capital cost allowance	IT-285R2	– capital cost allowance	IT-434R(SR)
– amalgamation of corporations	IT-474R	– capital cost allowance, exceptions to restrictions	IT-371
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– class 8 property	IT-472(SR)	– capital cost of \$50,000 or more, taxation	IT-274R
– deductibility	IT-128R	– meaning of “principal business” in relation to	IT-371
– clearing or levelling cost	IT-485	– taxation year of lessor	IT-434R(SR)
– disposition		Property, resource	
– combined consideration	IT-220R2(SR)	– amalgamation of corporations	IT-474R
– family farm transfer to child on death	IT-349R3	– Canadian, defined	IT-125R4
– legal and accounting fees	IT-99R5(C)	– Crown charges	IT-438R2
– proceeds of disposition	IT-220R2(SR)	– disposition	IT-125R4
– scientific research and experimental development	IT-151R5(C)	– foreign, disposition	IT-125R4
Property, ecological		– government assistance	IT-273R2
– deduction as gift		– involuntary disposition	IT-125R4
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– provincial incentive credit	IT-438R2	– employees' fringe benefits	IT-470R(C)
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– cost base, adjustment	IT-456R(SR)	– defined	IT-391R
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– interests and options, real property and shares	IT-176R2	– death benefits	IT-508R
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Property disposition		– capital cost allowance	IT-472(SR)
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– cultural property		Quebec government	
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– on ceasing to be resident	IT-451R	R	
– on ceasing to be resident election to exclude or include property	IT-451R	Radio and television	
– on ceasing to be resident election to pay tax by instalment	IT-451R	– program prizes, taxation	IT-213R
– former business property	IT-491(SR)	RCMP pensions	
– interest in a life insurance policy	IT-87R2	– exempt income	IT-397R(SR)
– partial, adjusted cost base	IT-264R(SR)	Ready-mix concrete truck	
– partial, capital cost allowance	IT-418	– manufacturing and processing deduction	IT-411R
– partnership acquiring from members	IT-413R	Real estate – see also Property, real	
– principal residence	IT-120R6	– conversion into inventory	IT-218R
– replacement property	IT-259R4	– options	IT-403R
– selling price based on production or use	IT-462	– profits from sale of	IT-218R
– timber resource property and timber limits	IT-481(C)	Reasonable amount	
– unpaid amounts	IT-109R2	– interest deductibility	IT-533
Property tax		Reassessments	
– land developers	IT-153R3	– options exercised in later year	IT-384R(SR)
Property transfer or loan		Recreational facilities	
– after separation, divorce or annulment	IT-325R2	– employees fringe benefits	IT-470R(C)
– agreements, price adjustment clauses	IT-169	– taxation	IT-148R3
– attribution of income	IT-434R(SR)	Rectification orders	
– capital cost allowance	IT-190R2; IT-434R(SR)	– acceptance	TN-22
– exchange of property	IT-259R4	Refinancing transactions	
– family farm to child on death		– interest deductibility	IT-533
– inter vivos	IT-268R3(SR); IT-268R4	Refrigeration equipment	
– intergenerational	IT-349R3	– capital cost allowance	IT-472(SR)
– inter vivos transfer of farm to child	IT-268R3(SR)	Refundable dividend tax on hand	
– inter-spousal	IT-511R	– private corporation	IT-243R4
– price adjustment clauses	IT-169	– taxable dividends	IT-269R4
– to corporation under subsection 85(1)	IT-291R3	Refundable tax credit	
– cash method taxpayer	IT-433R	– medical expenses	IT-519R2(C)
– to minor	IT-510	Registered charities	
Proprietors		– fund-raising events	
– thefts by	IT-185R(C)	– food, beverages and entertainment expenses	IT-518R
Protective Trusts		Registered education savings plans	
– transfer of property	TN-7	– qualified investments	IT-320R3
Provinces			
– incentive credits on resource activities	IT-438R2		

Topic	Bulletin or Technical News	Topic	Bulletin or Technical News
Registered home ownership savings plans		Rental operation	
– foreign property, taxation	IT-412R2	– permanent establishment	IT-177R2(C)
Registered pension funds or plans		– tax treatment	IT-434R(SR)
– contributions		Rental property – see Property, rental	
– current and past services	IT-167R6	Rents	
– interest or money borrowed for	IT-167R6	– non-residents' election re tax	IT-393R2
– non-deductible	IT-167R6	– prepaid on land or chattels, special reserve	IT-154R
– foreign property, taxation	IT-412R2	– prepayment	IT-261R
– transfer of funds to	IT-167R6	Reorganization	
– transfer of retiring allowance	IT-337R4(C)	– expenses	IT-143R3
– transfers of funds between plans	IT-528	– income trusts	TN-34
Registered retirement income funds		Replacement properties	
– benefits after maturity	IT-500R	– eligible capital property	IT-123R6
– deceased person's, taxation	IT-212R3(SR)	– rule v. business expansion	TN-25
– qualified investments	IT-320R3	Representation	
– payments on death of annuitant	IT-500R	– allowance, Crown corporation's employees abroad	IT-106R3
– payments to non-residents	IT-500R	– expenses	
– premium deductions and refund	IT-124R6	– legal and accounting fees	IT-99R5(C)
– qualified investments	IT-320R3	Research	
– refund of premiums	IT-500R	– assistants	IT-75R4
– out of matured plan	IT-500R	– grants	
– out of un-matured plan	IT-500R	– income and expense computation	IT-75R4
– pension income or qualified pension income	IT-500R	– taxability	IT-340R(SR)
– spouse or common-law partner, for	IT-307R4	Reserves	
– premiums paid	IT-124R6	– amounts due from sale of property	IT-154R
– transfer between plans	IT-124R6; IT-307R4; IT-528	– amounts to be included in income	IT-154R
– transfer of funds	IT-124R6	– doubtful accounts	
– pension fund or plan, to	IT-167R6	– sale of business	IT-188R(SR)
– transfer of pension, etc.	IT-124R6	– doubtful debts	IT-442R
– transfer of retiring allowance	IT-337R4(C)	– following a winding-up	IT-154R
Registered retirement savings plans		– following an amalgamation	IT-154R
– spousal or common-law partner plan	IT-307R4	– goods and services	IT-154R
Rehabilitative therapy		– rents received in advance	IT-154R
– medical expenses	IT-519R2(C)	– resource property, disposition	IT-125R4
Related persons		– special	
– arm's length	IT-419R2	– proceeds from land sale	IT-152R3
Relevant percentage		– types and conditions	IT-154R
– defined	IT-125R4	– transfer of farm property to child	IT-268R3(SR); IT-268R4
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– residence deduction	IT-141R(C)	– Crown corporation's employees abroad	IT-106R3
Remote work locations		– determination	
– employment at, deductions	IT-91R4	– corporations	IT-391R
– food, beverages and entertainment expenses	IT-518R	– individuals leaving and entering Canada	IT-221R3(C)
Remunerations		– sojourners'	IT-221R3(C)
– shareholder/manager	TN-22	– principal place	
– reasonableness	TN-30	– special work sites	IT-91R4
– unpaid in taxation year, agreements	IT-109R2	– trust or estate	IT-447
Renovation to a dwelling		Residents	
– medical expenses	IT-519R2(C)	– ceasing or becoming, deemed disposition or acquisition	IT-451R
Rental income		– deemed	
– computation	IT-434R(SR)	– residence status	IT-221R3(C)
– nature of	IT-434R(SR)	– partnership with non-residents, foreign tax credit	IT-81R

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– part-year		– legal expenses to collect	IT-99R5(C)
– capital losses	IT-262R2	Salary deferral arrangement	
– contributions to an RRSP	IT-124R6	– flexible employee benefit programs	IT-529
– losses	IT-262R2	Salesmen	
Resource properties – see Property, resource		– travel expenses	IT-522R
Retained earnings		Sand and gravel	
– large corporations		– sale of, farming business	IT-433R
– part I.3 tax	IT-532	Scholarships, fellowships and bursaries	
Retirement		– Canada Council grants	IT-257R
– meaning		– income computation	IT-75R4
– retiring allowances	IT-337R4(C)	– non-resident's tax rules	IT-75R4
Retirement compensation arrangement		– taxability	IT-340R(SR)
– flexible employee benefit programs	IT-529	School boards	
– interpretative issues	TN-34	– taxation of elected officers	IT-292
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– defined	IT-337R4(C)	– day sports	
– legal and accounting fees	IT-99R5(C)	– child care expenses	IT-495R3
– taxation	IT-337R4(C)	Schools and colleges	
– transfers	IT-337R4(C)	– subsidized services by employer	
– types of receipts	IT-337R4(C)	– employees' fringe benefits	IT-470R(C)
Returnable containers – see Containers		Scientific research and experimental development	
Returns		– acquisition of control and rights	IT-151R5(C)
– deceased person's	IT-326R3	– capital and current expenditures	IT-151R5(C)
– fees or expenses, deductibility	IT-99R5(C)	– defined	IT-151R5(C)
Revolving debts		– investment tax credit	IT-151R5(C)
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IT-200	Surface rentals and farming operations	<u>IT-269R4</u>	Part IV tax on taxable dividends received by a private corporation or a subject corporation
IT-201R2	Foreign tax credit – Trusts and beneficiaries	IT-270R3	Foreign tax credit
IT-202R2	Employees' or workers' compensation	IT-273R2	Government assistance – General comments
IT-206R	Separate businesses	IT-274R	Rental properties – Capital cost of \$50,000 or more
IT-209R(SR)	Inter vivos gifts of capital property to individuals directly or through trusts	IT-278R2	Death of a partner or of a retired partner
IT-210R2	Income of deceased persons – Periodic payments and investment tax credit	IT-280R(SR)	Employees profit-sharing plans – Payments computed by reference to profits
IT-211R	Membership dues – Associations and societies	IT-285R2	Capital cost allowance – General comments
		IT-286R2	Trusts – Amount payable

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Bulletin	Title	Bulletin	Title
IT-287R2	Sale of inventory	IT-342R	Trusts – Income payable to beneficiaries
IT-288R2	Gifts of capital properties to a charity and others	IT-343R	Meaning of the term corporation
IT-291R3	Transfer of property to a corporation under subsection 85(1)	IT-346R	Commodity futures and certain commodities
IT-292	Taxation of elected officers of incorporated municipalities, school boards, municipal commissions and similar bodies	IT-349R3	Intergenerational transfers of farm property on death
IT-293R(SR)	Debtor's gain on settlement of debt	IT-350R	Investigation of site
IT-295R4	Taxable dividends received after 1987 by a spouse	IT-352R2	Employee's expenses, including work space in home expenses
IT-297R2	Gifts in kind to charity and others	IT-357R2	Expenses of training
IT-302R3	Losses of a corporation – The effect that acquisitions of control, amalgamations, and windings-up have on their deductibility – After January 15, 1987	IT-359R2	Premiums and other amounts with respect to leases
IT-303(SR)	Know-how and similar payments to non-residents	IT-360R2	Interest payable in a foreign currency
IT-304R2	Condominiums	IT-361R3	Exemption from part XIII tax on interest payments to non-residents
IT-305R4	Testamentary spouse trusts	IT-362R	Patronage dividends
IT-306R2	Capital cost allowance – Contractor's movable equipment	IT-364	Commencement of business operations
IT-307R4	Spousal or common-law partner registered retirement savings plans	IT-365R2	Damages, settlements, and similar receipts
IT-309R2	Premiums on life insurance used as collateral	IT-369R(SR)	Attribution of trust income to settlor
IT-313R2	Eligible capital property – Rules where a taxpayer has ceased carrying on a business or has died	IT-371	Rental property – Meaning of "principal business"
IT-320R3	Qualified investments – Trusts governed by registered retirement savings plans, registered education savings plans and registered retirement income funds	IT-373R2(C)	Woodlots
IT-322R	Farm losses	IT-378R	Winding-up of a partnership
IT-325R2	Property transfers after separation, divorce and annulment	IT-379R	Employees profit-sharing plans – Allocations to beneficiaries
IT-326R3	Returns of deceased persons as "another person"	IT-381R3	Trusts – Capital gains and losses and the flow-through of taxable capital gains to beneficiaries
IT-328R3	Losses on shares on which dividends have been received	IT-384R(SR)	Reassessment where option exercised in subsequent year
IT-334R2	Miscellaneous receipts	IT-385R2	Disposition of an income interest in a trust
IT-335R2	Indirect payments	IT-386R	Eligible capital amounts
IT-337R4(C)	Retiring allowances	IT-387R2(C)	Meaning of "identical properties"
IT-339R2	Meaning of "private health services plan"	IT-389R	Vacation pay trusts established under collective agreements
IT-340R(SR)	Scholarships, fellowships, bursaries and research grants – Forgivable loans, repayable awards and repayable employment income	IT-391R	Status of corporations
IT-341R3	Expenses of issuing or selling shares, units in a trust, interests in a partnership or syndicate and expenses of borrowing money	IT-393R2	Election re tax on rents and timber royalties – Non-residents
		IT-394R2	Preferred beneficiary election
		IT-395R2	Foreign tax credit – Foreign-source capital gains and losses
		IT-396R	Interest income
		IT-397R(SR)	Amounts excluded from income – Statutory exemptions and certain service or RCMP pensions, allowances and compensation
		IT-400(SR)	Exploration and development expenses – Meaning of principal-business corporation

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Bulletin	Title	Bulletin	Title
IT-403R	Options on real estate	IT-456R(SR)	Capital property – Some adjustments to cost base
IT-404R	Payments to lottery ticket vendors	IT-457R	Election by professionals to exclude work in progress from income
IT-406R2	Tax payable by an inter vivos trust	IT-458R2	Canadian-controlled private corporation
IT-407R4(C)	Disposition of cultural property to designated Canadian institutions	IT-459	Adventure or concern in the nature of trade
IT-411R	Meaning of “construction”	IT-460	Dispositions – Absence of consideration
IT-412R2	Foreign property of registered plans	IT-462	Payments based on production or use
IT-413R	Election by members of a partnership under subsection 97(2)	IT-463R2	Paid-up capital
IT-416R3	Valuation of shares of a corporation receiving life insurance proceeds on death of a shareholder	IT-464R	CCA – Leasehold interests
IT-417R2	Prepaid expenses and deferred charges	IT-465R	Non-resident beneficiaries of trusts
IT-418	Capital cost allowance – Partial dispositions of property	IT-467R2	Damages, settlements and similar payments
IT-419R2	Meaning of arm’s length	IT-468R	Management or administration fees paid to non-residents
IT-420R3(SR)	Non-residents – Income earned in Canada	IT-469R	Capital cost allowance – Earth-moving equipment
IT-421R2	Benefits to individuals, corporations and shareholders from loans or debt	IT-470R(C)	Employees’ fringe benefits
IT-422	Definition of tools	IT-471R	Merger of partnerships
IT-425	Miscellaneous farm income	IT-472(SR)	Capital cost allowance – Class 8 property
IT-426R	Shares sold subject to an earnout agreement	IT-473R	Inventory valuation
IT-427R	Livestock of farmers	IT-474R	Amalgamations of Canadian corporations
IT-428	Wage loss replacement plans	IT-475	Expenditures on research and for business expansion
IT-430R3(C)	Life insurance proceeds received by a private corporation or a partnership as a consequence of death	IT-476	Capital cost allowance – Gas and oil exploration and production equipment
IT-432R2	Benefits conferred on shareholders	IT-477(C)	Capital cost allowance – Patents, franchises, concessions and licences
IT-433R	Farming or fishing – Use of cash method	IT-478R2	Capital cost allowance – Recapture and terminal loss
IT-434R(SR)	Rental of real property by individual	IT-479R(SR)	Transactions in securities
IT-437R	Ownership of property (principal residence)	IT-481(C)	Timber resource property and timber limits
IT-438R2	Crown charges – Resource properties in Canada	IT-482R	Pipelines
IT-440R2	Transfer of rights to income	IT-484R2	Business investment losses
IT-442R	Bad debts and reserves for doubtful debts	IT-485	Cost of clearing or levelling land
IT-443(SR)	Leasing property – Capital cost allowance restrictions	IT-487	General limitation on deduction of outlays or expenses
IT-444R	Corporations – Involuntary dissolutions	IT-489R	Non-arm’s length sale of shares to a corporation
IT-447	Residence of a trust or estate	IT-490	Barter transactions
IT-448(SR)	Dispositions – Changes in terms of securities	IT-491(SR)	Former business property
IT-450R	Share for share exchange	IT-492	Capital cost allowance – Industrial mineral mines
IT-451R	Deemed disposition and acquisition on ceasing to be or becoming resident in Canada	IT-494	Hire of ships and aircraft from non-residents
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IT-499R	Superannuation or pension benefits	IT-521R	Motor vehicle expenses claimed by self-employed individuals
IT-500R	Registered retirement savings plans – Death of an annuitant	IT-522R	Vehicle, travel and sales expenses of employees
IT-501(SR)	Capital cost allowance – Logging assets	IT-523	Order of provisions applicable in computing an individual's taxable income and tax payable
IT-502(SR)	Employee benefit plans and employee trusts	IT-524	Trusts – Flow-through of taxable dividends to a beneficiary – After 1987
IT-504R2(C)	Visual artists and writers	IT-525R(C)	Performing artists
IT-506	Foreign income taxes as a deduction from income	IT-526	Farming – Cash method inventory adjustments
IT-508R	Death benefits	IT-527	Distress preferred shares
IT-510	Transfers and loans of property made after May 22, 1985 to a related minor	IT-528	Transfers of funds between registered plans
IT-511R	Interspousal and certain other transfers and loans of property	IT-529	Flexible employee benefit programs
IT-512	Determination and redetermination of losses	IT-530R	Support payments
IT-513R	Personal tax credits	IT-531	Eligible funeral arrangements
IT-514	Work space in home expenses	IT-532	Part I.3 – Tax on large corporations
IT-515R2	Education tax credit	IT-533	Interest deductibility and related issues
IT-516R2	Tuition tax credit		
IT-518R	Food, beverages and entertainment expenses		
IT-519R2(C)	Medical expense and disability tax credits and attendant care expense deduction		

Part 4 – Numerical Listing of Technical News

Number	Subject	Number	Subject
TN-22	General Anti-Avoidance Rule (GAAR) Employee Benefits Rectification Orders Shareholder/Manager Remuneration Large Corporation Tax – Capital Tax Cases Limitation Laws on Collection Actions Tax Shelters News Release – Rulings Position Commission Income Transferred to Corporation Series of Transactions International Taxation	TN-32	Revocation of Previously Issued Rulings Application of Penalties Taxpayer's Opportunities to Respond to Assessments Control in Fact: Impact of Recent Jurisprudence Subsection 95(6): Scope of Application CRA Access to Accountants' or Auditors' Working Papers New Administrative Policy on Single-Purpose Corporations Notice of Objection of Large Corporation: Impact of the <i>Potash Corporation</i> case Joint International Task Force on Tax Shelters Reserve for Prepaid Amount: Impact of the <i>Ellis Vision</i> case Update on GAAR reviews
TN-23	List of "Approved" Entities for the Purpose of Scientific Research and Experimental Development Computer Software	TN-33	Income Earned or Realized – The <i>Kruco</i> Case Permanent Establishment – The <i>Dudney</i> Case Update
TN-24	Legal Costs to Obtain Support Amounts Cancellation of Interpretation Bulletins Correction to the French Version of IT-519R2 (Consolidated)	<u>TN-34</u>	Income Trusts and Interest Deductibility Income Trusts and Subparagraph 132(6)(b)(i) Income Trusts Reorganizations Income Trusts and Non-resident Ownership Loss Consolidation – Unanimous Shareholder Agreements Sale of Tax Losses Loss Consolidation – Provincial Tax Vancouver Olympic Games Auditors Working Papers Change in Trustees and Control Safe Income – The <i>Kruco</i> Case Third Party Penalties Future Directions <i>Delaware Revised Uniform Partnership Act</i> Review of Advance Rulings Process Emission Reduction and Offset Credits Canada-U.S. – Competent Authority Memorandum of Understanding Convention on Mutual Administrative Assistance in Tax Matters Creation of Capital Losses General Anti-Avoidance Rule and Audit Issues/Concerns Draft Legislation Update on Subsection 95(6) Update on Transfer Pricing Joint International Tax Shelter Information Centre Enhanced CRA Audits Treaty Interpretation and the Meaning of "Liable to Tax" Retirement Compensation Arrangements Permanent Establishments
TN-25	E-Commerce Reasonable Expectation of Profit Health and Welfare Trusts Refreshing Losses Replacement Property Rules and Business Expansion Foreign Exchange Losses Dividend Reinvestment Plans <i>Silicon Graphics Ltd.</i> Partnership		
TN-26	Proposed Guidelines on Split-Receipting		
TN-27	Archived Interpretation Bulletins Income Tax Publications Subscriber List		
TN-28	Large Corporation Tax – Long Term Debt Section 86.1 – Foreign Spin-Offs with "Poison Pill" Shareholder Rights Plans		
TN-29	Application of Paragraph 12(1)(x) Large Corporation Tax Income Tax Rulings Directorate New Automated Telephone System		
TN-30	Prepaid Income – Whether Subsection 9(1) or Paragraph 12(1)(a) Applies? Withholding Tax on Interest Computation/Allocation of Partnership Income and Losses Corporate Loss Utilization Transactions Reasonableness of Shareholder/Manager Remuneration Pre-judgment Interest Tax Avoidance Social Security Taxes and the Foreign Tax Credit Restricted Farm Losses (Section 31)		
<u>TN-31R2</u>	Social Security Taxes and the Foreign Tax Credit Single-Purpose Corporations Application of Paragraph 81(1)(h)		

Part 5 – List of Cancelled and Archived Bulletins Since the Last Publication of the Index

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