



## Open Government Partnership

### Independent Reporting Mechanism

#### Canada: Comment received on the third End of Term Report 2016-2018

#### **Commitment 11**

The IRM received the following comment from Natalie Bélec of the Department of Canadian Heritage on Commitment 11: Increase Transparency of Grants and Contributions Funding:

*The Department of Canadian Heritage led commitment #11 (Increase transparency of Grants and Contributions funding) of the Canada's 2016-2018 Open Government Action Plan. We have received the IRM End-of-Term Report to comment on and have the following clarification to add, if possible:*

*On page 42 the reports states...The deadline for the first wave of implementation has been set for 30 August, with full implementation scheduled for 1 April 2019. However, it is fair to consider these milestones as complete, given that the new standards are in effect and leading departments have already begun to comply. The Department of Canadian Heritage, for example, reports that the [open.canada.ca](http://open.canada.ca) portal now includes all of its grants and contributions data going back to 2006.*

*Clarification: From 2006 to 2015-16 PCH only posted amounts of 25k and above. It was in 2015-16 that we started posting amounts from 1 dollar and above.*

#### **Commitment 22**

The IRM received the following comment from the Canada Revenue Agency (CRA) on Commitment 22: Engage Canadians to Improve Key Canada Revenue Agency Services:

*The CRA generally supports the evaluation of this commitment but would like to outline further developments associated with Milestone 22.2.*

*Milestone 22.2: The CRA generally supports the IRM's evaluation of the consultations on the political activities of charities in the Midterm Status section.*

*The CRA notes and appreciates the revisions to the IRM's text for the End of Term Status, as well as the Did It Open Government sections. Along the lines of the previous comments, the CRA would suggest the addition of new text noting [Bill C-86](#) received Royal Assent on December 13, 2018, allowing charities to carry out unlimited public policy dialogue and development activities in furtherance of a charitable purpose. The CRA also released for consultation draft guidance on January 21, 2019, to explain how it expects to administer the new legislation framework.*

*If the above suggestions are adopted, consideration might also be given to revising the text that states no reforms have yet been made, to indicate no changes were made with the action period, more specifically.*

*Finally, the CRA recognizes the passing of Bill C-86 and the release of draft guidance for consultation falls outside the action plan period, but would note that, as implemented under measure 22.2, the impact on opening the government is arguably more than marginal. These changes have resulted in a significant increase in the ability of charities to engage with the government through political means to further their charitable purposes.*