



OFFICE OF THE PARLIAMENTARY BUDGET OFFICER
BUREAU DU DIRECTEUR PARLEMENTAIRE DU BUDGET

28 February 2019

The Honourable Diane Lebouthillier, Minister
Canada Revenue Agency
555 MacKenzie Avenue
Building Connaught Building
Floor 7
Ottawa, ON
K1A 0L5

cra.minister-ministre.arc@cra-arc.gc.ca

Information Request: IR0411

Dear Minister Lebouthillier:

As you are likely aware, the Parliamentary Budget Officer (PBO) provides independent and non-partisan analysis to the Senate and to the House of Commons about matters related to the nation's finances and the economy, the estimates, certain other documents government documents and the cost of proposals. In carrying out my mandate, I often require information held by government departments and Crown corporations and I am entitled to free and timely access – subject to limited exceptions – to such information under section 79.4 of the *Parliament of Canada Act*.

I am currently undertaking an analysis pursuant to paragraph 79.2(1)(b) of the *Parliament of Canada Act*, which mandates the PBO to prepare reports on matters of particular significance relating to the nation's finances or economy that are listed in an annual work plan.

For this analysis, I am requesting the following information:

Non-arm's length transactions between persons resident in Canada and non-resident persons as reported on Form T106 for the 2014-2019 taxation years. More specifically, I would like the totals in Canadian Dollars (or in the functional currency) of all property and services sold and purchased and other receipts/payments as reported in Box A=, B=, C=, D=, E=, F=, G=, H= and I= for all of the T106 Slips of each of the following types of reporting person: a) corporations; b) partnerships; c) trusts; and d) individuals. For each type of reporting person category I would like the totals reported in boxes 4 and 5 in section 2 of Form T106 by all reporting persons in that category. Additionally, I would like all the data stratified by NAICS code for each type of reporting person.

In regards to electronic funds transfers reported on Form RC438 for the 2015 to 2018 years, I would like the total aggregate incoming and outgoing amount for each country by currency type. We would like the total aggregates stratified by whether the beneficiary as identified in Part F or G of Form RC438 is an entity or an individual. I would like the data in a similar format as data we received in February 2018.

In regards to transfer pricing audits, I would like the number of audits overturned by the Appeals Branch and the amount of income and/or tax in dispute for the 2014 to 2019 years.

In order to provide the analysis to parliamentarians in a timely manner, I ask the information be provided to my office no later than **15 March 2019**. If access to the requested information cannot be granted by that date, a response must be provided by you or the Commissioner as soon as possible.

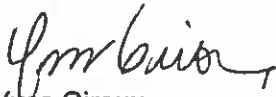
Should you or your staff have any questions about this information request, the analyst responsible, Mark Mahabir can be contacted directly at mark.mahabir@parl.gc.ca 613-301-6708.

Attached is a reply form. It too should be filled out and returned by 15 March 2019, whether or not you provide access to the requested information. Should you refuse to provide access to the requested information, you or the Commissioner must provide a written justification for the refusal as required under section 79.41 of the *Parliament of Canada Act*.

The response letter will be posted on the PBO website and, therefore, it should not be marked "confidential". As well, the requested information should be attached separately. If this information is confidential, please clearly mark it as such, either on the electronic spreadsheet or the hard copy version.

Providing timely and effective analysis to the Senate and House of Commons and promoting greater budget transparency and accountability are the PBO's primary objectives. The degree to which this is possible depends, to a large extent, on free and timely access to quality information held by government departments. In doing so, you are assisting us in better serving the Senate, the House of Commons, and their members.

Yours sincerely,



Yves Giroux
Parliamentary Budget Officer

c.c.: Katharine Rechico, Privy Council Office, Assistant Secretary to the Cabinet,
Liaison Secretariat for Macroeconomic Policy
Bob Hamilton, Commissioner of Revenue and Chief Executive Officer, Canada Revenue Agency

Attachment: Reply form for IR0411