

# Memorandum



To: Our Pension Clients  
From: Consulting Department  
Date: November 24, 2011

## Re: GST/HST Filing Requirements for Pension Plans

### Purpose

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The purpose of this memo is to inform our clients with registered pension plans that are funded through a trust agreement of the new GST/HST filing requirements that are being implemented by the Canada Revenue Agency ("CRA"). Our understanding is that these new rules are not applicable to registered pension plans that are funded through an insurance contract; however, we are still encouraging each client to review these rules to determine the applicability to their specific situation.

### Recent Developments

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CRA has recently published GST/HST Technical Information Bulletin B-107 "Investment Plans (Including Segregated Funds of an Insurer) and the HST" (available here <http://www.cra-arc.gc.ca/E/pub/gm/b-107/b-107-e.pdf>).

This Technical Information Bulletin is based upon the Excise Tax Act, the proposed amendments to the GST/HST legislation and the Draft Regulations Amending Various GST/HST Regulations, including the Selected Listed Financial Institutions Attribution Method (GST/HST) Regulations and proposed amendments to the New Harmonized Value-Added Regulations No. 2, which propose changes to certain GST/HST rules for financial institutions released on January 28, 2011.

### Next Steps

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Plan sponsors are strongly recommended to review these new requirements with their tax advisors.

As a reminder, Actuarial Solutions Inc. does not provide tax advice; however, we would be happy to refer any of our clients to firms who specialize in the taxation of pension plans in Canada.

Please feel free to contact your consultant (Jason, Dean or Joe) if you would like to discuss any of the above.

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