

## Canadian Conference of the Arts position on Bill C-470

Presentation to the Standing Committee on Finance

By

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Mr. President, members of the Committee,

My name is Alain Pineau and I am the National Director of the Canadian Conference of the Arts (CCA). Thank you for giving me the opportunity to present our views on Bill C-470.

The CCA is the oldest and most broadly based cultural umbrella organization in Canada. The CCA provides a national forum for the entire arts, culture and heritage community, from all disciplines and regions. Our membership reaches over 300 thousand artists, creators and cultural workers.

The CCA fully supports the objectives of transparency within the structures of charitable organizations in Canada, but it is our opinion Bill C-470 is fundamentally unnecessary, intrusive and ill-conceived.

Like other members of Imagine Canada, we rejoice in the fact that the sponsor of the Bill has proposed to drop the controversial cap on salaries. This suggestion was certainly the most intrusive aspect of the Bill. While it may not affect many organizations in the cultural sector – salaries over a quarter a million dollars are rarely found in the art sector! – we all object to this unjustified intervention of the government in the governance of civil society organizations.

In our view, the second aspect of the Bill remains objectionable, even after the proposed amendment to establish a \$ 100 K floor on salaries to be made public. Again, this would not apply to many people or organizations in the arts sector, but it is our opinion that it remains intrusive and unjustified.

A large number of organizations in the arts, culture and heritage sector have the status of charitable organizations. However, the vast majority receive only a small percentage of their revenue from donations. Very few arts, culture or heritage organizations receive even 10% of their revenue from charitable donations.

Take CCA's own case: over the past three years, charitable donations have contributed a small but much needed 1% of the total revenue of the CCA. People who give to organizations like ours do so because they support the work we do and want to help us pay the expenses related to our main activities. Our case is not unique in the arts, culture and heritage sector. It is our position that even with a floor of \$ 100 K, this article of Bill C-470 would still constitute an unwarranted and unnecessary intrusion on Canadians' right to privacy.

Why unnecessary? Because the CCA believes that Revenue Canada already has measures in place to regulate non-profit spending. Canadian charities are already required to publicly account for their organizational activities and finances, including information on staff compensation. Form T3010 requires the provision of a substantial amount of information, including: contact information; details about directors; detailed revenue and expenditure information; description of charitable programs; political activities; transfers to qualified organizations; and fundraising revenues and expenditures. Charities must also report compensation information on Schedule 3 to the T3010 which includes the total number of full-time staff, total amount of staff compensation and the total amount paid to part-time staff.

The information is available, but we can agree with the Honorable Albina Guarnieri that this information may be difficult for Canadians to understand and access. We agree that all Canadians should have easy access to this information in order to be better informed on the operations of charities. But instead of approaching the problem of transparency by applying intrusive legislation onto charities, we suggest that this is an opportunity for this committee and interested members of Parliament to work with Revenue Canada to make information on charities more accessible to a Canadian audience.

So, to sum up, the CCA considers this Bill ill-conceived, intrusive and unnecessary and would urge you to defeat it.

I thank you for your attention and will be pleased to answer any questions you may have.