



**Submission to the House of Commons Standing Committee on Finance
Pre-budget Consultations in Advance of the Fall 2025 Budget**

August 1, 2025

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Recommendation 1: That the government maintain the advancement of religion as a charitable purpose.

Recommendation 2: That government policies avoid politicizing charitable status.

Recommendation 3: That the government increase the annual budget of the Canada Community Security program in order to help protect places of worship.

Recommendation 4: That the government establish a permanent national strategy to combat human trafficking with stable funding for victims' services, ongoing training for law enforcement and frontline personnel, as well as prevention efforts.

Recommendation 5: That the government establish and implement permanent funding measures to provide exit supports and services for individuals in prostitution and for initiatives to increase public awareness of the prostitution laws.

Recommendation 6: That the government work with provinces and territories to increase the availability and accessibility of palliative care through initiatives which recognize palliative care is separate and distinct from practices which intentionally end the life of the patient, such as medical assistance in dying.

The Evangelical Fellowship of Canada (EFC) is the national association of 50 evangelical Christian denominations comprised of over 7,000 churches, as well as 32 postsecondary institutions and 86 ministry organizations in Canada. Established in 1964, the EFC provides a forum for collaboration and engagement among the roughly 2 million Evangelicals who are part of its constituency.

Recommendation 1: That the government maintain the advancement of religion as a charitable purpose.

Budget 2025 should support and strengthen the charitable sector.

The charitable sector plays a key role in Canadian society. Of the more than 73,000 charitable organizations registered with the CRA, more than 30,000 fall under the advancement of religion, roughly 42% of the charitable sector.

The advancement of religion has been affirmed in common law as a charitable purpose for centuries.

The thousands of churches and faith-based organizations across Canada that are religious charities benefit their participants, their communities and Canadian society as a whole. Religious charities foster vibrant social networks, mobilize outreach, spark local volunteerism and foster community resiliency.

Religious communities' existence and ministry benefit Canadian society in ways far beyond the religious adherents themselves. Many religious traditions teach their adherents to care for their neighbours. Frequent religious service attenders are among the core of volunteers and charitable donors. Canadians who are religiously active are more likely than other Canadians to donate, to give more when they do, and to volunteer and contribute significantly to nonreligious charities.

We are very concerned about Recommendation 430 in last year's Finance Committee report on pre-budget consultations, tabled on Dec. 13, 2024.¹ It recommended the government, "Amend the *Income Tax Act* to provide a definition of a charity which would remove the privileged status of 'advancement of religion' as a charitable purpose."

We have urged the government not to follow the recommendation from the Finance Committee's 2024 report to remove advancing religion as a charitable purpose, but instead to recognize the relevance and benefits of religion to the charitable sector and Canadian public life.

¹ <https://www.ourcommons.ca/Content/Committee/441/FINA/Reports/RP13466781/finarp21/finarp21-e.pdf>

Recommendation 2: That government policies avoid politicizing charitable status.

It is important for Government of Canada policies to avoid politicizing charitable status. We have strong concerns about recommendations that a charity be ineligible for charitable status or have its charitable status put at risk because its beliefs or priorities differ from the mainstream, or from the government of the day.

In our view, Recommendation 429 in the 2024 Finance Committee report,² that the government “No longer provide charitable status to anti-abortion organizations” would not be compliant with *Charter* protections of conscience, religion, thought, belief, opinion and expression.

The phrase “anti-abortion organizations” suggests that groups could be singled out for denial of charitable status simply on the basis of their underlying beliefs about abortion and when life begins.

A liberal democracy such as Canada is founded on the premise that diverse beliefs will be respected and accommodated.

Participation in the public square and a level playing field with respect to government programs – including eligibility for charitable status – should not be subject to a values test, or dependent on how closely an organization aligns with the views of the government of the day.

We urge you to be careful not to politicize the charitable sector. Canada has a diverse charitable sector that is permitted to hold opinions and views that differ from the government. If charitable status were to depend on alignment with the policy of any particular government, all charities – and Canada’s vibrant charitable sector – would be at risk.

Recommendation 3: That the government increase the annual budget of the Canada Community Security program in order to help protect places of worship.

The EFC is very concerned about growing antireligious sentiment in Canada. There have been violent incidents at the places of worship of various faith communities. Many churches have been burned in recent years. The Quebec City mosque attack in 2017 was one of the deadliest mass shootings in Canadian history. We are deeply troubled by the alarming increase in antisemitism in Canada and the growing incidents of violence targeting Jewish schools, institutions and places of worship.

² <https://www.ourcommons.ca/Content/Committee/441/FINA/Reports/RP13466781/finarp21/finarp21-e.pdf>

We've joined with other faith communities to stand against hatred based on religious identity.³ Canada must take steps to protect minority religious groups and the ability of all people and communities of faith to live safely and peacefully.

Recommendation 4: That the government establish a permanent national strategy to combat human trafficking with stable funding for victims' services, ongoing training for law enforcement and frontline personnel, as well as prevention efforts.

The government has long recognized that trafficking is a serious violation of human rights. Canada has acknowledged the importance of a comprehensive, coordinated and multifaceted national approach to respond to human trafficking in its national strategies.

However, the most recent national strategy has ended without a new strategy in place. The realities of human trafficking call for deliberate, coordinated action, both in Canada and around the world. It is essential that Canada enact a permanent, responsive strategy with significant, stable funding to effectively fight human trafficking. Time-limited strategies can result in gaps in funding, policy and response.

The strategy should include funding for victims' services, ongoing training for law enforcement and those who work within the criminal justice system, and efforts to raise awareness and increase prevention. These are critical in the fight against human trafficking, alongside legislative efforts.

Recommendation 5: That the government establish and implement permanent funding measures to provide exit supports and services for individuals in prostitution and for initiatives to increase public awareness of the prostitution laws.

The Supreme Court has recognized that in passing Canada's current legislation, the *Protection of Communities and Exploited Persons Act (PCEPA)*, Parliament "adopted a new paradigm to regulate the sale of sexual services based on the 'Nordic Model' used in several Scandinavian countries."⁴ The Court noted Parliament's intent, "*PCEPA* seeks "to reduce the demand for prostitution with a view to discouraging entry into it, deterring participation in it and ultimately abolishing it to the greatest extent possible." [par. 22] A critical component of this model/approach to prostitution includes funding for exit services and for public education on the provisions of the law.

The 2024 report on prostitution by the UN Special Rapporteur on Violence against Women and Girls recognizes prostitution as a system of exploitation and violence, which reduces

³ https://www.interfaithconversation.ca/sites/default/files/statement_en.pdf

⁴ Paragraph 2, *R. v. Kloubakov*, Supreme Court of Canada, July 224, 2025, <https://decisions.scc-csc.ca/scc-csc/scc-csc/en/item/21132/index.do>

women and girls to commodities, and a system of inequality and discrimination based on sex and other intersecting grounds.⁵

The UN Special Rapporteur recommends that all States Parties adopt the abolitionist legal framework and its five pillars. These five pillars are: the decriminalization of women in prostitution; providing comprehensive support and exit pathways; criminalizing the purchase of sexual acts; criminalizing all forms of pimping; and implementing sensitization campaigns for sexual act buyers.

PCEPA is based on this framework and achieves three of its five pillars. Canada has not, however, implemented public awareness campaigns about the laws or provided comprehensive support and exit pathways as the model intends, certainly not in a sustained way. This pillar is essential, as the intent of the Equality or Abolitionist model is not to take away a source of livelihood without providing options.

Previous Canadian programs that have expired have not been renewed or replaced.⁶

We urge the government to provide funding for comprehensive support and exit pathways for those who wish to leave prostitution.

Recommendation 6: That the government work with provinces and territories to increase the availability and accessibility of palliative care through initiatives which recognize palliative care is separate and distinct from practices which intentionally end the life of the patient, such as medical assistance in dying.

The International Association for Hospice and Palliative Care's consensus-based definition of palliative care has been adopted by the Canadian Hospice Palliative Care Association.⁷ This definition describes active holistic care of individuals that aims to improve quality of life and "intends neither to hasten nor postpone death, affirms life and recognizes dying as a natural process."⁸

Palliative care is distinct from medical assistance in dying in approach, definition and philosophy. It must be adequately funded and supported, and its distinctive approach and philosophy protected.

⁵ <https://www.ohchr.org/en/documents/thematic-reports/ahrc5648-prostitution-and-violence-against-women-and-girls-report>

⁶ <https://www.canada.ca/en/news/archive/2014/12/government-canada-announces-20-million-help-victims-leave-prostitution.html>; <https://www.justice.gc.ca/eng/rp-pr/jr/rmapi-epmlcp/p2.html>.

⁷ <https://www.chpca.ca/wp-content/uploads/2024/07/CHPCAs-Position-Statement-on-MAiD-%E2%80%93-2023-Update.pdf>

⁸ <https://iahpc.org/research/consensus-based-definition-of-palliative-care/definition/>