



# Relief measures for businesses: Canada's COVID-19 response plan

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Many Canadian businesses, along with non-profits and charities, may be particularly hard-hit by the financial fallout of COVID-19 and may experience a significant loss of revenue. The Government of Canada has put into place a variety of measures to help Canadian businesses facing hardship as a result of the COVID-19 outbreak to avoid layoffs of workers. Among the measures are a new loan program for businesses, wage subsidy programs for employers and deferred payment deadlines for income tax and GST / HST.

Here's a brief summary of some of the relief measures available to businesses and non-profits in Canada.

## Canada Emergency Business Account

The Canada Emergency Business Account (CEBA) provides interest-free loans of up to \$40,000 to businesses and not-for-profits to help cover their operating costs during a period where their revenues have been temporarily reduced due to the economic impacts of the COVID-19 pandemic. The loans are guaranteed by the Canadian government and administered by your financial institution. Up to \$10,000 can be forgiven (25% of the loan amount) if the balance is repaid by December 31, 2022. The application deadline for CEBA loans is October 31, 2020.

To qualify, borrowers must have a federal tax registration number. They will either need to demonstrate they paid between \$20,000 to \$1.5 million in total payroll in 2019 based on their 2019 T4 SUM Summary of Remuneration Paid, or alternatively, that they have certain non-deferrable expenses of between \$40,000 and \$1.5 million. To be eligible, expenses must have been paid in January or February 2020, or a legal obligation to pay the expense in 2020 must have existed as of March 1, 2020. These non-deferrable expenses can include wages to arm's length parties, rent, property taxes, utilities and insurance. These expenses will be adjusted for support or subsidies received by a business under another Canadian government COVID-19 response program.

## Applying at CIBC

Business owners who do day-to-day business banking with CIBC are able to use a fully digital application process to apply for CEBA. To qualify, the business must use a CIBC business operating account, opened on or before March 1, 2020, for day-to-day payments and cash management activities. If CIBC isn't your primary bank, you should apply through the financial institution that holds your primary business operating account.

To apply, CIBC business clients must have registered for CIBC Online Banking® for Business. Applications are started using this online banking system. Those applications based on the payroll option can complete their application online at CIBC using their CRA Payroll Number. If the application is based on the non-deferrable expenses stream, then applicants will be directed to a government CEBA website to upload evidence of the non-deferrable expenses. Once the loan is processed, funds will be deposited directly to the client's CIBC business operating account. If the loan can't be repaid by December 31, 2022, it can be converted into a 3-year term loan with an interest rate of 5%.

To make sure CIBC can manage application volumes and process loans quickly, all applications must be submitted online. If your business isn't yet registered for CIBC Online Banking® for Business, you can register now using your CIBC Business Convenience Card® number.

## Taxation

The CRA has indicated that the amount that is forgivable is taxable in the year that the loan is received. For instance, if a \$40,000 CEBA loan is received in 2020, \$10,000 must be included in income in 2020. If the loan balance is not repaid by December 31, 2022 so that the \$10,000 is no longer forgivable, an offsetting deduction would be available in the taxation year in which the amount is repaid.

## Other loan and guarantee programs

In addition to the CEBA, as part of Canada's Business Credit Availability Program (BCAP), some businesses may also be able to obtain financing to assist with operational cash flow requirements through a new co-lending program set up with the Business Development Bank of Canada (BDC) and a loan guarantee program with the Export Development Bank of Canada (EDC). Loans under each of these programs will be for incremental credit amounts up to \$6.25 million. CIBC clients may now apply for the EDC BCAP as either a term loan or credit facility. Further details on eligibility and specific loan criteria are available through CIBC Commercial Banking Relationship Managers, and on the [EDC website](#).<sup>1</sup> This program is available until June 2021.

## Wage subsidy programs

To help prevent lay-offs, the government has announced two separate wage subsidy programs. The Canada Emergency Wage Subsidy (CEWS) provides both large and small employers with a subsidy to help employers to keep their workers when they have had a decline in revenue. The second program, the Temporary Wage Subsidy, is aimed at assisting small- and medium-sized employers with their payrolls by offering qualifying employers a wage subsidy of 10% through reduced payroll remittances.

Detailed information on these two wage subsidy programs may be found in our report, "[Wage subsidy programs for employers: Canada's COVID-19 response plan](#)."<sup>2</sup>

## Canada Emergency Commercial Rent Assistance (CECRA)

The CECRA program provides loans to qualifying commercial property owners who are landlords, to cover 50 per cent of monthly rent payable for the months of April through September 2020 for eligible tenants who are experiencing financial hardship. The program is administered by the Canada Mortgage and Housing Corporation (CMHC). The loans will be disbursed directly to the landlord's financial institution. Applications may be made by a landlord for all impacted tenants at once.

For April, May and June, the loans will be forgiven if the landlord reduces the tenants' rents by at least 75 per cent for the three corresponding months under a rent forgiveness agreement, which includes a term not to evict the tenant while the agreement is in place. The landlord would cover 25 per cent of the rent, the federal and provincial / territorial governments would share 50 per cent<sup>3</sup> and the tenant would cover the remaining 25 per cent of the rent. Landlords must either refund rents already paid for the relevant period, or, if the tenant agrees, provide a credit for future rent.

<sup>1</sup> See [edc.ca/en/campaign/coronavirus-covid-19.html](https://edc.ca/en/campaign/coronavirus-covid-19.html).

<sup>2</sup> The report "Wage subsidy programs for employers: Canada's COVID-19 response plan" is available online at [cibc.com/content/dam/personal\\_banking/advice\\_centre/tax-savings/covid-wage-subsidy-en.pdf](https://cibc.com/content/dam/personal_banking/advice_centre/tax-savings/covid-wage-subsidy-en.pdf).

<sup>3</sup> The provinces and territories have agreed to share up to 25 per cent of costs and facilitate implementation of the program. For example, details of the Ontario-Canada Emergency Commercial Rent Assistance Program are available online at [news.ontario.ca/opo/en/2020/04/ontario-canada-emergency-commercial-rent-assistance-program.html](https://news.ontario.ca/opo/en/2020/04/ontario-canada-emergency-commercial-rent-assistance-program.html).

Eligible tenants include:

- Businesses paying no more than \$50,000 per month in rent, have no more than \$20 million in gross annual revenues, who temporarily ceased operations or experienced at least a 70 per cent drop in pre-COVID-19 revenues<sup>4</sup>; and
- Non-profit or charitable organizations.

For the months of July, August and September, if a business qualified for CECRA for April, May and June, then they automatically qualify for July, August and September, without reassessing their revenue decline. When applying for the July, August and September CECRA extensions, the landlord may select which tenants from the original application are to be included for those months. You may also be able to apply for the July, August and September rent reduction as a new applicant for CECRA.

If you have not yet submitted your application or are still creating it, the deadline to submit new applications is September 30, 2020. If you have been approved for rental assistance and are applying for the July, August, or September extension, the deadline to submit your application is October 30, 2020.<sup>5</sup>

## Tax payment and filing deadlines

The government announced extensions of certain deadlines for filing tax returns and paying balances owing.<sup>6</sup>

### Income taxes

The tax return filing deadlines for some businesses have been extended. A T2 Corporation Income Tax Return is normally due six months after the corporation's year end. For corporations that would otherwise have a filing due date after March 18 and before June 1, 2020, the filing deadline was extended to June 1, 2020. For corporations that had a filing deadline in June, July or August of 2020, the filing deadline was extended to September 1, 2020. The filing deadline for a 2019 T1 Income Tax and Benefit Return has been extended to June 1 and remained June 15 for self-employed individuals and their spouses or common-law partners; however, the Canada Revenue Agency ("CRA") has stated that you will not be charged late-filing penalties or interest if your 2019 individual (T1) income tax returns or corporate tax returns are filed and payments are made prior to September 30, 2020.

There has also been an extension in the time to make certain payments. The CRA will allow all businesses to defer, until September 30, 2020, the payment of any income tax amounts that become owing on or after March 18, 2020 and before September 30, 2020. This relief applies to tax balances due, as well as corporate income tax instalments. The government made it clear that no arrears interest or penalties will accumulate on these amounts during this period.

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<sup>4</sup> Revenue loss can be calculated by comparing gross revenue from April, May and June of 2020 with either revenue from April, May and June of 2019, or alternatively the average gross revenues for January and February of 2020.

<sup>5</sup> Information on what will be required to support an application can be found on the CMHC website at [cmhc-schl.gc.ca/en/finance-and-investing/covid19-cecra-small-business?guide=What%20you%20need%20to%20apply](https://cmhc-schl.gc.ca/en/finance-and-investing/covid19-cecra-small-business?guide=What%20you%20need%20to%20apply).

<sup>6</sup> Information from the CRA on income tax filing and payment dates in light of COVID-19 is available at [canada.ca/en/revenue-agency/campaigns/covid-19-update/covid-19-filing-payment-dates.html](https://canada.ca/en/revenue-agency/campaigns/covid-19-update/covid-19-filing-payment-dates.html).

## **GST / HST remittances**

The CRA has also pushed back the deadline for GST / HST remittances. Normally, GST / HST amounts collected by businesses are due by the end of the month following the vendor's reporting period. For example, if your business is a monthly filer, the GST / HST amounts collected on its February sales are due by the end of March. The CRA extended the remittance deadline to June 30, 2020. The result is that monthly filers could delay remitting amounts collected for the February, March and April 2020 reporting periods until June 30 while quarterly filers had until that date to remit amounts collected for the January 1, 2020 through March 31, 2020 reporting period. Annual filers, whose GST / HST return or instalments are due in March, April or May 2020, could remit amounts collected and owing for their previous fiscal year as well as instalments of GST / HST for current fiscal year by June 30, 2020.

## **Employer payroll reporting - new T4 requirements for 2020**

Additional employer payroll reporting will be required for the 2020 T4 tax slip, which reports remuneration paid to employees. Four new information codes will be required to report employment income and retroactive payments to employees relating to the following time periods:

- Code 57: Employment income – March 15 to May 9
- Code 58: Employment income – May 10 to July 4
- Code 59: Employment income – July 5 to August 29
- Code 60: Employment income – August 30 to September 26

Each period relates to the dates on which the employee was paid (and not necessarily the period of work the payment covered.) These new reporting requirements are in addition to the existing requirement to report the employee's total annual income in Box 14, "Employment Income."

The purpose of this additional reporting is to assist the CRA to validate payments under the Canada Emergency Response Benefit, Canada Emergency Student Benefit and the CEWS, as eligibility for those benefits is impacted by employment income paid during these specified periods.

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