TAXING FAITH

Halo Effect and the Implications

Of Taxing Canadian Places of Worship

Abstract

In Canada, the social, spiritual and communal value of local worshipping congregations has long been accepted. The value that Canadians place on these organizations is reflected in their charitable status and the tax-free benefits this affords. But with increasing costs, and governments at all levels needing to mine new sources of revenue, there is increasing pressure from some segments of Canadian society to reduce or eliminate this charitable status. Drawing on data from the Halo Canada project, the author puts forward a socio-economic case for maintaining the charitable status of places of worship, suggesting that the socio-economic or Halo Effect of congregations outweighs the benefits of government taxation by more than ten times.

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HALO CANADA

Context

In May of 2012, Toronto Star columnist Ken Gallinger asked: *"Are Tax Breaks for Places of Worship Outdated?"* Gallinger (2012) concluded:

> I'm not quite ready to argue that houses of worship should be stripped, automatically, of charitable or tax-free status. Many still do community-based work that is enormously valuable, both socially and financially … but perhaps the time has come when places of worship wanting tax breaks should have to prove in some equitable way, that they deserve them.

In September 2015, City Council in Langley, British Columbia approved a strategy to tax religious properties that had previously been exempt, in order "to reduce the tax burden for the general taxpayers." The plan, as reported by the Langley Advance Times (Gathercole, 2015), was scheduled to go into effect in January 2017, and would have raised $82,000 towards the city budget. However, in November of that same year, Langley City Council unanimously reversed its decision following deputations from several churches and other community organizations. When asked about the reversal, Langley's Director of Corporate Services stated: "It's reasonable to assume that the delegations proved effective" (Baklinsky, 2015).

In 2017, René Bruemmer (2017) of the Montreal Gazette reported that churches in Montreal were receiving unexpected tax bills for spaces that had previously been exempt. Churches reported that city officials had been visiting sites, taking pictures of rooms and documenting how each of these spaces were being used. Church officials were informed that only those spaces used for public worship or religious education would remain exempt and that churches would be taxed accordingly. Rooms rented out to community groups like the Boy Scouts and Girl Guides would be taxed.

The article also reports that the enforcement of rules governing the sale of worship buildings had been shifting. Previously, when a congregation closed, the property would maintain its tax-exempt status until a new congregation or community organization purchased the property. Tax exemption officers, however, had recently begun taxing these congregations as soon as religious services ceased. In at least one other case, a church minister was informed that the congregation would have to pay taxes even if only part of the building was closed temporarily for renovations.

In responding to these concerns, the president of Montreal's executive committee stated that these inspections were merely part of the city's regular review in order ensure that none of the city's more than 1,300 worship sites were being rented out for purposes other than religion. He reassured local congregations that "these establishments can keep their

vocational status, even if they lend out part of their property to community groups like Alcoholics Anonymous or the Scouts", adding however, that churches who disagreed with the exemption office's interpretation could contest their evaluation to the Administrative Tribunal of Quebec.

Similarly, in 2018, Nova Scotia tax officials inspected 40 churches across the province who had been operating daycares out of their buildings, stripping almost half of them of their tax exemption. CBC News (Prentiss, 2018) reported that the crackdown began following a Nova Scotia Supreme Court ruling that public, fee-for-service daycares operated by churches, or on a church property, are not exempt from taxation.

In each of these examples, we see how society's shifting understanding of the role of religion in society is playing out in the question of taxation. The relationship is, at best, a murky one.

Charitable Status for Places of Worship in Canada

The earliest known records of religious tax exemption date back to as early as 2600 BCE in Egypt. During what is known as the Old Kingdom (c. 2613 - 2181 BCE), the Egyptian rulers built their now-famous mortuaries at Giza and other places throughout Egypt. Each of these sites required priests to perform the same rituals they did at the temples in order to ensure the continuance of souls in the afterlife. The monarchs rewarded the priests by making their land and its harvest tax exempt (Allen, 1997). Similar examples are found in ancient Israel (Selven, 2014) and in the early Christian world with Constantine, Emperor of Rome from 306-337 CE, who granted Christian churches a complete exemption from all forms of taxation (Lenski, 2016).

In Canada, the understanding of religious taxation can be traced back to the English Statute of Charitable Uses 1601 (United Kingdom, 2005), which granted churches, along with all other charitable institutions, an exemption from taxes based on an understanding that these organizations relieved the state of some governmental functions and therefore deserved a benefit in return.

Charitable status, in Canada, is granted by the Canada Revenue Agency's Charities Directorate (2019a). The Directorate identifies eight types of charitable activity, under which a charitable organization may qualify (Canada Revenue Agency, 2016). They include: social services; international aid and development; education and research; culture and arts; religion; health; environment; and other community benefits.

The Directorate further distinguishes religious charities in the following ways: places of worship, congregations, parishes, dioceses, fabriques[1], etc.; missionary organizations, evangelism; religious

[1] Fabriques represent an ecclesiastical structure unique to the Province of Quebec with historical reference to the governance of Roman Catholic parishes by the old French colonial regime, when the King of France had a special responsibility for the protection and promotion of the Catholic faith. Currently, fabriques are

publishing and broadcasting; seminaries and other religious colleges; and social outreach, religious fellowship and auxiliary organizations.

According to the Canada Revenue Agency (2015), the benefits of registering as a charity include:

1. Permission to issue official receipts for the gifts it receives. These receipts can be used by the donor to reduce their taxable income.
2. Exemption from paying income tax under Part 1 of the Income Tax Act.
3. Permission to receive gifts from other charities, such as foundations.
4. Increased credibility in the community through following certain rules and guidelines in order to maintain their registration.
5. Many goods and services provided by registered charities are exempt from Canada's goods and services tax / harmonized sales tax. In many situations, registered charities are also eligible to claim a partial rebate on the GST/HST they pay.

The Social Benefits of Religion in Canada

It is clear to see why religious organizations would desire charitable status. But what benefit does granting charitable status to religious organizations hold for the rest of society? In 2019, a Special Senate Committee on the Charitable Sector, released its report entitled, *Catalyst for Change: A Roadmap to a Stronger Charitable Sector.*

At a press conference following the publication of their report, members of the committee affirmed the benefit that many religious charities bring to Canadians. Senator Robert Black stated: "Churches are community hubs, especially in rural and northern communities … they form the basis of our communities." (Pellowe, 2019a) When asked by a reporter whether religious organizations should be included if they only appear to promote themselves (Boutros, 2019), Chairperson Senator Terry Mercer responded:

> *Yes, they are promoting their own religion, but I think religion is a good thing. It depends – and I'm not going to single out any particular religion – each person has a relationship with their god that is very personal and how they express that is important. Churches, synagogues, mosques have been the focal point in many communities: they have been the cement that's kept communities together.*

Deputy Chair Senator Ratna Omidyar added, "I think we need to recognize that religious institutions do more than simply preserve their religious beliefs; they extend themselves in very significant ways, and we should appreciate and recognize that, as opposed to looking at whether they should qualify *(for charitable status)* or not" (Boutros, 2019).

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recognized as a civil corporation that acts like a trustee on behalf of the Roman Catholic parish, owning and managing all of the assets for the sake of the purposes of the parish (Dowd, 2008).

As John Pellowe (2019a, 2019b), of the Canadian Council of Christian Charities suggests, the benefits of religious organizations can be summarized in four basic ways:

1. **Religion and religious congregations promote pro-social attitudes**
   In Canada, Beaman and Lefebvre (2014), Friesen and Clieff (2014), and Brownlee et al (2006), remind us that religious congregations benefit society by promoting pro-social attitudes such as empathy, social responsibility, forgiveness, honesty, kindness, friendliness, generosity and concern for others that improve public civility and result in higher levels of generosity and volunteerism that benefit Canadians, whether religious or not.

2. **Religion and religious congregations contribute to better personal outcomes**
   Johnson et al (2008) survey a number of reports that document the ways that religious involvement contribute to better personal outcomes and reduce demands on the state's resources for the criminal justice system and rehabilitation (Hummer et al, 1999), social support and health care by contributing to fewer marital breakdowns, stronger families and social networks, rejection of unlawful behaviour, higher school attendance and graduation (Schludermann et al, 2000), as well as increased mental and physical health (Fagan, 2006). Religious involvement improves quality of life, increases a sense of personal efficacy, and promotes greater contribution by individuals to society (Pellowe, 2019b).

3. **Religion and religious congregations have tangible social-economic benefits for community**
   Cnaan et al (1999, 2013, 2018) and Wood Daly (2016, 2020), both report the tangible socio-economic benefits religion offers society in terms of social capital, infrastructure and neighbourhood viability through shared use of congregational space, neighbourhood spending, education, support of individuals and families, and volunteer time.

4. **Religion and religious congregations create intangible benefits for the public at large**
   Clark and MacDonald (2017) highlight that religious congregations create intangible benefits for the public at large including many of society's common understandings around assembly, speech, and the press. Beaman and Lefebvre (2014), Putnam (2000), and Fukuyama (2011) add that organized religion helps to improve government stability by increasing social capital and stimulating economic growth.

The Socio-Economic Benefits of Religion in Canada

In his presentation to the Special Senate Committee, Pellowe (2019b) indicated that many of the benefits described above also have measurable, tangible value. But to what extent? Beginning in 2015, the Halo Canada Project began to explore the socio-economic impact of Places of Worship on Canadian society. In, *Dollars and $ense: Uncovering the Socio-Economic Impact of Religious Congregations in Canada* (Wood Daly, 2020), we explored the economic impact of 76 religious congregations across the country. While it only represents a small sample size, these findings were

then applied to the annual 2017 tax reporting of Canada's more than 21,000 congregations to reveal an estimated annual benefit of approximately $15.5 billion.[2]

To consider the significance of this figure, we compared these findings to the Gross Domestic Product (GDP) of other Canadian industries. In the last quarter of 2017, Statistics Canada (2018) reported that Canada's GDP was approximately $2.8 trillion (CDN). Our estimate of $15.5 billion therefore represents the equivalent of 0.71% of Canada`s annual GDP. In terms of scale, this ranks the contribution of local congregations slightly ahead of management of companies and enterprises (0.62%), just behind the contributions made by the arts, entertainment and recreation (0.77%) and only 0.82% behind the contributions made by agriculture. As a further point of comparison, of the 19 industries typically measured, eight (or 42%) of them register a GDP of approximately 3% of the total or less.

The Socio-Economic Benefits of Religion in Canada

While the Special Senate Committee re-affirmed the importance of religious congregations to Canadian Society, and in so doing continued to validate their status as charitable organizations, there are many in Canadian society who question this. Some of the more prevalent shifts in in societal attitude are expressed as follows:

1. **The current definitions of "charity" and "religion" are inadequate**
   Ian Bushfield, Executive Director of the BC Humanist Association argued, in his submission to the Special Senate Committee (2019), that Canada's tax laws do not adequately define what a "charity" is or what activities can be considered charitable.

   > *For a religious purpose to qualify as charitable there must be "an element of theistic worship, which means the worship of a deity or deities in the spiritual sense." There is no corresponding charitable purpose for non-theistic Canadians to promote their worldviews. Charities that represent and advocate for the non-religious, like ours, are limited to promoting education about humanism or promoting human rights more generally. Whereas groups that want to promote a specific religious and theistic worldview are automatically deemed to be providing a tangible social benefit.*

   Accordingly, Bushfield (2019) asserts that the charitable definition of "religion" or "the advancement of religion", as it stands, should either be eliminated or expanded to include organizations with non-theistic beliefs.

   In its response to this and related concerns, the Special Senate Committee acknowledged the dilemma but stressed that, in Canada, the legal meaning of charity has evolved through

[2] This reference reports on the early findings of an ongoing study. To justify the small sample size, Wood Daly (2020) cites the parallel work of Grim and Grim (2016) who base their impact assessment of close to 345,000 congregations across the United States on the Halo findings of Cnaan et al (2013) in a much smaller sample of 12 congregations in the City of Philadelphia.

common law and, as a result, Canadians should continue to rely on a "reasoning by analogy … that keeps pace with the changing times"(Broder, 2019).

2. **Places of worship are essentially "religious clubs" which are intended primarily to serve the needs of their own membership.**
This idea is, perhaps, best summarized by American comedian and political commentator Bill Maher (Moran, 2016). In April 2016, on his show *Real Time with Bill Maher,* the host vented his frustration over the tax-free status of American churches. After stating that 22% of Americans identify themselves as atheists or agnostics, Maher asked why "almost a quarter of us are being forced to subsidize a myth that we're not buying into. Why am I subsidizing their Sunday morning hobby?"

Maher is not alone. Nor is this sentiment unique to Americans. Will Mirewood (2016), of the Canadian-based *Atheistic Thinkers,* writes:

> *It has long been assumed that "the advancement of religion" provides a tangible benefit to the public. While organizations that address other acceptable charitable purposes like "the relief of poverty, advancement of education, etc." must make annual reports on their actions, by assuming "the advancement of religion" serves the public interest, Canadian citizens are essentially forced to subsidize religious activities without any accountability.*

And yet, Vezina and Crompton (2012) report that religious Canadians show higher rates of giving, participating and volunteering than those in the general population. Almost two-thirds of Canadians (65%), aged 15 and older, who attend religious services at least once a week contribute some type of volunteer work, compared with only 44% of those who attend less frequently or not at all. They also observed that people who attend religious services regularly contribute 40% more hours on average than other volunteers. In 2010, regular religious attenders contributed 202 hours annually, compared to 141 hours for non-religious Canadians.

Canadians might also assume that religious Canadians who attend worship regularly might be more likely to contribute the majority of their volunteer time to religious organizations, this is not the case. While they do contribute more time to religious organizations than less frequent attenders (42% compared to 4%), Vezina and Crompton found that 58% of regular attenders' volunteer time was spent in support of non-religious organizations.

The Halo Canada Project's research found that a typical congregation contributes 15,735 member-volunteer hours each year. 58.3% of these hours are directed towards community-based programs and activities, while 41.7% go towards activities intended for congregational members themselves.

3. **Designating places of worship as charitable organizations forces all Canadians to support religion, even if they oppose some or all of their religious doctrines, and ends up costing society significant amounts of lost revenue**
   Earlier we cited the case of Langley City Council, who sought to "reduce the tax burden of general tax payers" by taxing places of worship. The amount they expected to raise was approximately $82,000 (Gathercole, 2015).

   One website refers to churches as "religious loopholers" (Islandnet, 1996). According to 1996 figures from the Greater Vancouver Area, they estimated that congregations were denying Canadian society of approximately $160 million in lost tax revenues. The writer goes on to say:

   > *Canadian citizens can no longer afford to carry free-loaders. For those people who find the idea of taxing religions repugnant, then perhaps they would concede if churches were required to put back into their community an amount equal to their tax assessment. As things stand, it is very doubtful that any church is putting as much into the community as it receives in benefit from being part of that community.*

   This argument is rooted in the understanding of some that religious tax exemptions are essentially a subsidy. However, in the United States Supreme Court case of *Walz v. Tax Commission,* the court made an important distinction between subsidy and exemption that bears weight in the Canadian context as well. The court reasoned that granting a tax exemption does not amount to a government subsidy because the government does not transfer part of its own revenue to churches, but instead, simply refrains from demanding that the church support the state. (Martin, 2017). The question, as Zelinsky (2017) describes, is one of 'entanglement'. In other words, how much should government be involved with religious organizations in order to enforce their taxation, or alternatively to protect their tax exemption? Either case "invariably involves choices among conflicting goals, such as revenue-generation, administrability, public acceptability, economic neutrality, valuation considerations and liquidity concerns."

   In the end, Zelinsky concludes (in keeping with the U.S. Supreme Court decision) that instead of taxing the Church entirely or exempting it completely, imperfect trade-offs are reasonably applied between "competing and legitimate values", thus making it part of the normative tax base. (Wagenmaker and Oberly, 2017).

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Halo Tax Benefit (HTB)

The Halo Canada Project estimates that religious congregations contribute a minimum of $15.5 billion worth of social benefit to Canadian society (Wood Daly, 2020). This value, however, does not take into account what religious congregations might pay in taxes if they no longer had charitable status.

In order to respond to this important dynamic, beginning in 2018, the Project began to explore what is referred to as a "Halo Tax Benefit" (HTB). The HTB represents the financial benefit that religious congregations currently receive as a result of their charitable status as well as the financial benefit that governments and society *would* receive if congregations no longer enjoyed these benefits due to a loss of their charitable status. The Halo Tax Benefit incorporates three primary factors:

1. An amount equivalent to the property tax that religious congregations would be required to pay if they were no longer able to claim charitable tax status.

2. An amount equivalent to the sales tax rebate that federal and provincial governments would no longer need to credit back to congregations.

3. An amount equivalent to the personal tax credit the government would no longer be required to credit back to donors.

To date, the Halo Canada Project has assessed these three factors in 54 of the 76 Halo Canada congregations.[3] These congregations are located in 9 of Canada's 13 provinces and territories and represent 17,515 regular attending worshippers. The average weekly attendance of these worshipping congregations is 324 (median = 220). In total, these congregations have annual expenditures of $43.1 million and an estimated annual Halo Effect of about $140.7 million. This translates to a per-capita contribution based on numbers of worshippers of $8,032. The average congregational Halo Effect for these study congrgations is $555,996 (median = $410,780). When actual spending is compared to the socio-economic benefit these congregations provide, it is estimated that society receives average of $3.98 worth of social benefit for every dollar they spend (median = $3.27). Complete values for these study congregations are available in Appendix A.

So how does a Halo Tax Benefit relate to these values? When we account for these potential tax factors in each of the 54 congregations, we estimate that the study congregations are benefitting from a total of just over $20 million worth of annual charitable benefits. This is made up of $4.4 million worth of property tax exemptions and $1.1 million worth of sales tax rebates. Their individual donors also receive $14.5 million worth of personal tax credits. As Figure 1 illustrates, property tax exemptions represent about 22% of the total, sales tax rebates represent about 5% of the total, while personal tax credits represent 73% of the total.

[3] While the Halo Canada Project includes congregations from Christian and non-Christian traditions, the Tax Benefit subset includes only Christian congregations.

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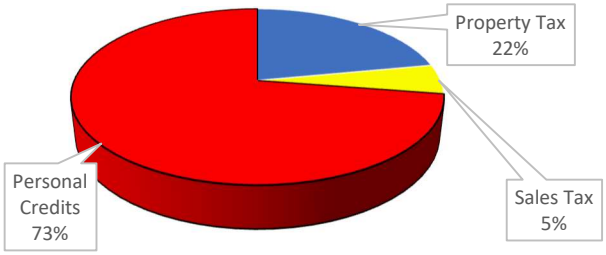
Figure 1
Potential Tax Benefits as a Percentage
54 Congregation Study



On this basis, critics might suggest that these congregations and their members are "denying" Canadian society of approximately more than $20 million in lost revenue. This figure of $20 million, however, measures far less than the $140.7 million in social benefit these 54 congregations contribute to Canada's social economy each year. In fact, the data suggests that Canadian congregations are providing about 10.42 times more benefit to society than if these congregations were taxed. Even if we subtract the difference, these congregations still make a net contribution of about $120.7 million towards Canada's common good.

The National Halo Tax Benefit and its Importance

If we apply these findings to the financial accounting of religious congregations across the country, what do we find? In *Dollars and $ense* (Wood Daly, 2020), we reported that Canada's religious congregations contribute approximately $15.5 billion[4] annually to Canada's social economy. If we assume that this value is 10.42 times greater than the HTB of these congregations, we can estimate that Canadian congregations and their members receive some $1.5 billion[5] worth of tax-exempt benefit. Critics would suggest that this represents $1.5 billion that Canadian society is missing out on.

In light of these findings, should Canada consider moving to reduce or eliminate the charitable tax status of religious congregations? Does this present an opportunity to exploit untapped revenues?

[4] Canadian religious congregations contribute $15,468,556,809 annually in socio-economic benefit to Canadian society.
[5] Canadian religious congregations and their members receive $1,484,506,412 in benefits as a result of their charitable tax status.

How does the Halo Tax Benefit we have desccribed inform this conversation? If Canadian congregations were not afforded this benefit, what would it cost Canadian society? Let us consider the following:

1. **Canadian congregations are funded primarily by their members**
   In 2017, Canadian congregations reported approximately $5.8 billion in annual revenues (Canada Revenue Agency, 2017). $3.8 billion (65.9%) of that was provided by member donors. Another $1.97 billion was raised through things like investment income, space rentals and fund-raising activities. Religious congregations received only $96.3 million (1.7%) from government sources (see Table 1). Canadian religious congregations do not rely on direct funding from government or public sources. In fact, they rely laregely on their own resources to benefit Canadian society.

Table 1: Sources of Revenue Canadian Religious Congregations 2017

Source of Revenue	Dollar Value	% of Total
Receipted Donations	$3,793,347,534	65.9%
Investment Income	$104,682,943	1.8%
Receipts from Charities	$212,980,761	3.7%
Received from Government	$96,319,850	1.7%
Rental Income	$344,220,660	6.0%
Fundraising	$165,807,125	2.9%
Other	$1,041,618,750	18.1%
Total	$5,758,977,623	100%

However, if Canadian religious congregations were no longer permitted to issue charitable donor receipts, it is likely that donors would be less motivated to contribute towards their work (Lasby and Barr, 2018). While some faithful givers would continue, many congregations would struggle to survive financially. For example, speaking in response to the municipal tax debate in Langley, British Columbia, Rev. Paula Porter stated, “For St. Andrew’s Anglican Church, the financial burden would force us to close our doors … this would result in the elimination of the Anglican church in the City of Langley, all the services it provides and the non-profit grops who rely on us would have to find other spaces, likely at the cost they would have difficult managing.”

And so, while critics might argue the merits of this "natural selection", they must also recognize that it would likely be at the cost of much of the $15.5 billion Canadian congregations currently contribute to society through: public use of space; supportive programs for children, youth, adults, seniors and refugees; recreational facilities; direct spending; public education opportunities; instruction in music and the arts; employment training and life-skills programs; food security; micro-lending and housing supports.

According to a recent study coordinated by the National Trust of Canada and Faith and the Common Good, the loss of religious community space alone would be devastating to Canadian society. They report that close to one-third of community groups who use congregational space do so at no cost, and almost two-thirds do not believe they would be able to relocate if the worship space they operate out of were to close (Fry and Friesen, 2020).

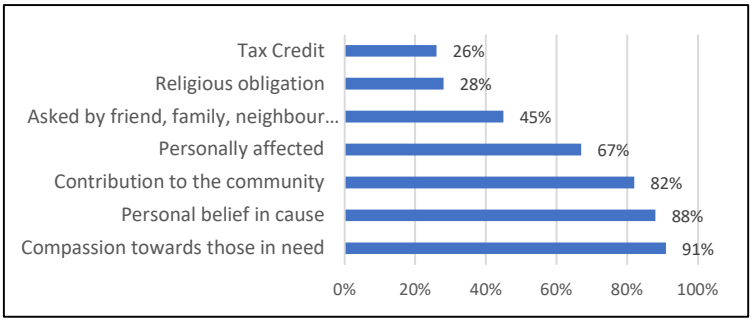
Taking into account the $1.5 billion congregations benefit from through tax exemptions, Canadian society still benefits from a net Halo contribution of close to $14 billion[6] and a spending index of $2.74 for every dollar spent.[7]

2. **Taxing religious congregations potentially favours larger congregations over smaller ones**
   As with many organizations, larger is often better when it comes to financial resources. Larger churches might be more likely to have the resources to: 1) fund operations through donors willing to donate without the benefit of a charitable tax credit, 2) hire lawyers and accountants to help minimize their tax burden, and 3) have the opportunity to benefit from larger revenues due to greater amounts of available rental space. As a result, smaller congregations would face disproportionate obstacles to survival. Recognizing that 43% of Canadian congregations have annual revenues less than $500K, the implications of this to Canadian society would likely be considerable. Reimer and Wilinson (2010) also point out that while Canada has several large ethno-centric congregations, most, especially in the Christian evangelical traditions, tend to be small. If smaller and poorer congregations will find it more difficult to pay taxes than larger ones and that many small size congregations are immigrant congregations; taxing congregations would amount to an additional burden on Canadian immigrants.

3. **Taxing religious congregations risks losses in spending stimulus**
   Another important dynamic that many critics fail to address in the question of religious taxation is the potential loss of spending stimulus. Lasby and Barr (2018) report that most Canadians donate for a variety of personal and ideological reasons. Ideological factors include feelings of compassion towards those in need and a desire to make a contribution towards their community. Personal motivators include a belief in the organization's cause, or being personally affected by or knowing someone who is affected by the cause. Other reasons for donating, including getting a tax credit or religious obligations, were both reported by less than 30% of respondents (see Figure 2).

[6] Actual adjusted Halo value is $13,984,050,397. This figure is the product of *National Halo Value – HTB = Adjusted Halo Value*
[7] Based on 2017 expenditures by Canadian congregations of $5,113,904,881

Figure 2
Motivations for Charitable Giving of Canadians



Source: Lasby and Barr, 2018

While tax credits rank as one of the country's smallest motivators for donors, it is not insignificant. Consider that Canadian residents are able to claim an average of 41% in federal and provincial credits on their charitable donations in order to reduce taxable income (Canada Revenue Agency, 2020). While this does not necessarily mean that Canadians are likely to spend all of these credits directly, it should be noted that governments often use tax credits to stimulate spending. Those who argue for the reduction or elimination of the charitable tax status of religious congregations fail to appreciate the risk of losing this increased economic stimulus.

4. **Taxing religious congregations would disproportionally affect vulnerable members of society who are not part of congregations.**
   In 2006, Gottlib, Conn, and Barr reported that only 27% of religious organizations say it is their own members who benefit most from their activities. In fact, Handy and Cnaan (2000), report that non-members were four times more likely to access a congregation's community programs than its own members. As a result, taxing religious congregations, and thereby threatening their viability, would disproprotionally effect the most vulnerable in society.

5. **Taxing religious congregations when their members receive no monetary gain would amount to double taxation**
   We might also argue that taxing members of religious congregations, who are already taxed on their personal incomes, for their participation in voluntary organizations from which they derive no monetary gain, would amount to "double taxation" and effectively serve to discourage them from devoting time, money, and energy to these organizations which contribute positively to society.

6. **Taxing religious congregations could potentially threaten the charitable status of other Canadian charities**
   Taxing religious congregations begs the question, if congregation's are taxed, why not also tax other organizations that currently benefit from charitable status, such as arts and cultural organizations? (Juneau, 2002)

   In order to qualify as a registered charity, organizations must meet what is called a "public benefit" test. This includes demonstrating that:

   - Its purposes and activities provide a measurable benefit to the public
   - The people who are eligible for benefits are either the public as a whole, or a significant section of it. In other words, the beneficiaries cannot be a restricted group or one where members share a private connection, such as in social clubs and professional associations (Canada Revenue Agency, 2019b).

   Since Canadian congregations clearly demonstrate these benefits (Wood Daly, 2020), the only way to remove or limit the charitable tax status of religious organizations under the current law would be to remove or limit the charitable tax status of other existing charitable organizations. In order to change the laws governing the public benefit test in such a way as to not be discriminatory on the basis of religion, the potential exists for other charitable organziations to be excluded as well.

7. **Taxing religious congregations threatens the socio-economic well-being of the communities they are a part of**
   Taxing religious congregations undermines their ability to remain financially viable and could potentially lead to closures. Kinney and Combs (2015) discuss this dynamic in their study of community viability following the closure of urban congregations in the City of St. Louis and the surrounding county. Their findings suggest that the closure of any one congregation contributes to a 1.3% decrease in community viability over the following decade. With an average of 5 closures per year in the Greater St. Louis area, this correlates with a 6.5% decrease in residential, economic, and social viability overall.

Limits

This study has several important limits. With more than 21,000 religious congregations in Canada, 54 congregations represents a relatively small sample size. As a result, our findings should be seen as emerging indicators that merit further study.

Congregations in our study sample have a median attendance of 220 worshippers and an average attendance of 324. This measures more than twice the median attendance of 100, reported by Reimer and Wilkinson in 2010, for some 11,000 Canadian Evangelical congregations. On the face of

it, these figures might also raise questions about the congregational size of our sample. As an alternative, we cite a December 2013 poll, conducted by the Evangelical Fellowship of Canada and Angus Reid, that found that in any given week, 13% of Canadians attend some form of congregational worship. In contrast to the work of Reimer and Wilkinson (2010), this study accounts for the religious congregations of all Canada's faith traditions, not just the evangelical ones. With a current population of about 38 million (Statistics Canada, 2020) and just over 21,200 congregations nation-wide, we can estimate that the average Canadian congregation has an average weekly attendance of 233 worshippers. With this figure more in line with our average and median values, we are confident that the congregations in our study are reflective, in size, of Canadian congregations more broadly.

Nevertheless, further congregational assessments will 1) add to our statistical confidence in the findings, 2) contribute to a greater understanding of what correlations may or may exist between congregational size and the Halo Tax Benefit; 3) better explain how urban and rural designations influence the Halo Tax Benefit; and 4) reveal whether or not our current assessments accurately reflect regional variations in property values.

Some initial insights on these ideas include:

1. **Congregational Size:** Initially, we might assume that larger congregations will have larger buildings and properties, and that, if congregations were required to pay property tax on these properties, larger properties would require larger tax payments. Consider, however, the number of large-building, small-property, downtown places of worship, with congregations well under one hundred worshippers, that are sitting on multi-million-dollar parcels of land. The tax payments required be these congregations would more than likely out-distance those of much larger congregations, with larger properties in suburban or semi-rural communities. We cannot assume there is a direct correlation between attendance and property size and therefore the taxes that might be required on congregational properties.

2. **Urban and Rural Differences:** Urban and rural congregations also have clear differences that could potentially impact our understanding of the Halo Tax Benefit. In an unpublished study for the United Church of Canada, we observed that rural congregations represent 34% of the total number of United Churches in Canada and contribute about 20% of the denomination's Local Halo impact. Conversely, urban congregations represent 66% of the total number of congregations and contribute about 80% of the the denomination's Local Halo impact. These percentages are relatively consistent with the percentage of Canadian rural (31%) and urban (69%) congregations.[8] With only 7% of our study's congregations

[8] There is considerable debate about where the line between urban and rural exists. For the purposes of this study, Urban and rural designations were determined using the Canadian Postal Code system. Canadian postal codes with a '0' in the second position denote a 'rural' postal code, meaning that the location is served by rural route mail delivery. While this system is helpful, its not perfect. For example, according to Canada Post's coding system, New Brunswick has no congregations with a rural address. Using this designiation, a review of Canada Revenue filings suggest that 31% of Canadian congreations are rural and 69% are urban.

coming from rural communities and the remaining 93% from urban communities, we are not yet able to draw adequate conclusions regarding the rural/urban impact on the HTB.

3. **Regional Location:** Property values, and therefore the taxes paid on these properties, fluctuate widely bewteen communities and regions based on the markets. For example, a property in Vancouver or Toronto might be priced very differently than a property in Winnipeg, Saskatoon or Fredericton, despite all being considered urban communities. Even in different communities, similarly priced properties might be taxed differently, according to the unique needs of the local municipality.

Each of these factors highlight the need and opportunity for future study on this topic.

Conclusions

This study provides an initial estimate of the socio-economic contribution of Canadian religious congregations, over and above the benefit these congregations receive as a result of their Canadian charitable status. Our early findings suggest these Halo contributions are 10.42 times the tax findings they receive.

While critics argue against the charitable status of religious congregations, our findings demonstrate that religious congregations fill an essential economic role, in addition to the social role they perform in Canadian society. They promote pro-social values, contribute to better personal outcomes and offer tangible socio-economic benefits, as well as intangible community benefits to the religious and non-religious alike. Economically, they offer Canadian society a net annual benefit of close to $14 billion. This translates to a net benefit of $2.74 for every dollar they spend.

In conclusion, we are reminded of the words of Special Senate Committee Deputy Chair Ratna Omidyar when she states, “Religious institutions do more than simply preserve their religious beliefs; they extend themselves in very significant ways, and we should appreciate and recognize that, as opposed to looking at whether they should qualify *(for charitable status)* or not” (Boutros, 2019).

Taxing Canada’s religious congregations would not only undermine the viability of these congregations, but their capacity to contribute in this way, especially to Canada’s most vulnerable, and seriously diminish our mutual experience of what it means to be Canadian.

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Appendix A – Halo and Hal Tax Benefit Values

Congregation Code	Urban / Rural	Community Size	Affiliation	National Halo Value	Attendance	National Per Capita	Actual Spending	National Spending Ratio
AB1	Rural	5K -10K	United Church	$1,283,245	111	$11,561	$275,647	$4.66
AB2	Urban	1M - 2M	Fellowship Baptist	$1,700,209	200	$8,501	$525,071	$3.24
AB3	Urban	1M - 2M	United Church	$1,390,359	220	$6,320	$346,300	$4.01
AB4	Rural	5K - 10K	Salvation Army	$2,276,751	29	$78,509	$532,764	$4.27
AB5	Urban	25K - 50K	Fellowship Baptist	$2,776,878	530	$5,239	$1,355,737	$2.05
AB6	Urban	1M - 2M	United Church	$2,103,462	156	$13,484	$553,372	$3.80
BC1	Urban	100K - 500K	Fellowship Baptist	$2,224,891	488	$4,559	$1,044,835	$2.13
BC10	urban	2M+	United Church	$2,482,922	251	$9,892	$1,461,116	$1.70
BC11	Urban	10K - 25K	United Church	$1,011,693	120	$8,431	$298,664	$3.39
BC12	Urban	50K - 100K	United Church	$3,090,506	100	$30,905	$281,569	$10.98
BC2	Urban	50K - 100K	United Church	$831,265	126	$6,597	$311,904	$2.67
BC3	Urban	2M+	Fellowship Baptist	$2,028,446	220	$9,220	$823,107	$2.46
BC4	Urban	10K-25K	Fellowship Baptist	$1,430,201	270	$5,297	$532,622	$2.69
BC5	Urban	100K - 500K	United Church	$1,715,915	136	$12,617	$408,010	$4.21
BC6	Urban	100K - 500K	Fellowship Baptist	$3,226,883	486	$6,640	$1,086,828	$2.97
BC7	Urban	50K - 100K	Fellowship Baptist	$2,001,124	784	$2,552	$1,000,000	$2.00
BC8	Urban	100K - 500K	Fellowship Baptist	$5,302,473	400	$13,256	$1,290,896	$4.11
BC9	Urban	50K - 100K	Fellowship Baptist	$4,164,135	600	$6,940	$1,825,480	$2.28
MB1	Urban	500K - 1M	United Church	$3,585,012	80	$44,813	$362,536	$9.89
NB1	Urban	100K - 500K	United Church	$800,127	32	$25,004	$172,027	$4.65
NB2	Urban	50K - 100K	United Church	$1,861,104	180	$10,339	$545,030	$3.41
NL1	Urban	100K - 500K	United Church	$3,067,524	32	$95,860	$626,866	$4.89
ON1	Urban	100K - 500K	Fellowship Baptist	$3,431,725	250	$13,727	$756,000	$4.54
ON10	Urban	500K - 1M	United Church	$3,496,856	80	$43,711	$419,744	$8.33
ON11	Urban	2M+	United Church	$2,744,183	185	$14,833	$473,641	$5.79
ON12	Rural	5K - 10K	United Church	$558,171	50	$11,163	$122,400	$4.56
ON13	Urban	10K - 25K	United Church	$491,500	40	$12,288	$170,312	$2.89
ON14	Urban	100K - 500K	Fellowship Baptist	$1,406,420	220	$6,393	$534,100	$2.63
ON15	Urban	500K - 1M	United Church	$1,524,235	80	$19,053	$270,000	$5.65
ON16	Urban	100K - 500K	Fellowship Baptist	$1,863,124	400	$4,658	$640,610	$2.91
ON17	Urban	500K - 1M	Anglican	$2,264,889	350	$6,471	$764,000	$2.96
ON18	Rural	1K - 5K	Fellowship Baptist	$1,089,626	283	$3,850	$607,635	$1.79
ON19	Urban	2M+	United Church	$3,429,604	85	$40,348	$1,349,321	$2.54
ON2	Urban	2M+	United Church	$1,665,090	120	$13,876	$873,404	$1.91
ON20	Urban	100K - 500K	United Church	$2,837,739	60	$47,296	$294,920	$9.62
ON21	Urban	500K - 1M	Fellowship Baptist	$5,080,248	925	$5,492	$1,839,959	$2.76
ON22	Urban	100K - 500K	Fellowship Baptist	$11,463,336	1038	$11,044	$2,236,721	$5.13
ON3	Urban	2M+	United Church	$2,529,470	60	$42,158	$269,528	$9.38
ON4	Urban	100K - 500K	Fellowship Baptist	$6,075,454	1100	$5,523	$2,321,982	$2.62
ON5	Urban	100K - 500K	United Church	$1,202,420	180	$6,680	$486,854	$2.47
ON6	Urban	100K - 500K	Fellowship Baptist	$7,288,439	1370	$5,320	$3,088,723	$2.36
ON7	Urban	5K - 10K	Fellowship Baptist	$1,738,554	427	$4,072	$1,173,342	$1.48
ON8	Urban	100K - 500K	Fellowship Baptist	$860,601	283	$3,041	$464,463	$1.85
ON9	urban	100K - 500K	Fellowship Baptist	$6,717,583	1417	$4,741	$2,935,555	$2.29
PE1	Urban	50K - 100K	Fellowship Baptist	$4,555,977	285	$15,986	$848,110	$5.37
QC1	Urban	100K - 500K	Fellowship Baptist	$1,568,704	450	$3,486	$455,781	$3.44
QC2	Urban	500K - 1M	Fellowship Baptist	$1,633,789	303	$5,392	$480,836	$3.40
QC3	Urban	2M+	Fellowship Baptist	$1,634,590	290	$5,637	$371,161	$4.40
QC4	Rural	50K - 100K	Fellowship Baptist	$1,871,024	250	$7,484	$271,830	$6.88
QC5	Urban	100K - 500K	Fellowship Baptist	$2,117,054	333	$6,358	$642,207	$3.30
QC6	Urban	2M+	Pentecostal	$2,776,218	725	$3,829	$1,310,258	$2.12
QC7	Urban	2M+	Pentecostal	$1,184,973	135	$8,778	$376,643	$3.15
QC8	Urban	100K - 500K	United Church	$874,463	30	$29,149	$287,592	$3.04
SK1	Urban	100K - 500K	United Church	$2,351,617	160	$14,698	$346,300	$6.79
TOTAL			**54**	**$140,682,802**	**17515**	**$8,032**	**$43,144,313**	
AVERAGE				**$555,996**	**324**			$3.98
MEDIAN				**$410,780**	**220**			$3.27

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Congregation Code	Urban / Rural	Community Size	Property Tax Estimate	Sales Tax Rebate	Personal Credit	Tax Exemption	Halo Tax Benefit	Corrected Halo
AB1	Rural	5K -10K	$23,602	$2,505	$130,966	$157,073	8.17	$1,126,172
AB2	Urban	1M - 2M	$7,257	$2,266	$160,127	$169,649	10.02	$1,530,560
AB3	Urban	1M - 2M	$75,314	$1,348	$142,630	$219,293	6.34	$1,171,067
AB4	Rural	5K - 10K	$9,411	$3,158	$16,759	$29,327	77.63	$2,247,424
AB5	Urban	25K - 50K	$79,222	$9,142	$456,210	$544,573	5.10	$2,232,305
AB6	Urban	1M - 2M	$25,643	$3,018	$211,675	$240,336	8.75	$1,863,126
BC1	Urban	100K - 500K	$162,808	$4,241	$397,329	$564,377	3.94	$1,660,514
BC10	urban	2M+	$799,914	$35,070	$181,618	$1,016,602	2.44	$1,466,321
BC11	Urban	10K - 25K	$35,187	$3,457	$68,737	$107,381	9.42	$904,311
BC12	Urban	50K - 100K	$33,429	$2,676	$73,772	$109,877	28.13	$2,980,629
BC2	Urban	50K - 100K	$11,443	$4,331	$99,695	$115,470	7.20	$715,795
BC3	Urban	2M+	$120,656	$1,473	$181,423	$303,551	6.68	$1,724,895
BC4	Urban	10K-25K	$41,268	$0	$183,991	$225,259	6.35	$1,204,942
BC5	Urban	100K - 500K	$52,248	$20,757	$90,153	$163,158	10.52	$1,552,757
BC6	Urban	100K - 500K	$87,335	$4,888	$547,642	$639,865	5.04	$2,587,018
BC7	Urban	50K - 100K	$51,149	$6,512	$426,540	$484,200	4.13	$1,516,924
BC8	Urban	100K - 500K	$65,466	$4,738	$443,661	$513,865	10.32	$4,788,608
BC9	Urban	50K - 100K	$199,722	$7,329	$568,320	$775,370	5.37	$3,388,765
MB1	Urban	500K - 1M	$23,929	$2,016	$117,111	$143,056	25.06	$3,441,956
NB1	Urban	100K - 500K	$50,543	$10,799	$40,172	$101,514	7.88	$698,613
NB2	Urban	50K - 100K	$14,477	$15,814	$146,569	$176,860	10.52	$1,684,244
NL1	Urban	100K - 500K	$220,439	$1,062	$66,523	$288,024	10.65	$2,779,500
ON1	Urban	100K - 500K	$51,256	$16,600	$273,666	$341,522	10.05	$3,090,203
ON10	Urban	500K - 1M	$46,660	$4,479	$117,630	$168,769	20.72	$3,328,087
ON11	Urban	2M+	$55,841	$8,654	$113,739	$178,235	15.40	$2,565,948
ON12	Rural	5K - 10K	$9,440	$1,988	$46,975	$58,403	9.56	$499,768
ON13	Urban	10K - 25K	$8,850	$4,011	$50,758	$63,619	7.73	$427,881
ON14	Urban	100K - 500K	$43,698	$3,976	$204,407	$252,081	5.58	$1,154,339
ON15	Urban	500K - 1M	$18,675	$10,000	$44,850	$73,525	20.73	$1,450,710
ON16	Urban	100K - 500K	$62,607	$11,898	$295,334	$369,839	5.04	$1,493,285
ON17	Urban	500K - 1M	$54,190	$26,196	$197,433	$277,819	8.15	$1,987,071
ON18	Rural	1K - 5K	$8,891	$7,253	$231,079	$247,222	4.41	$842,404
ON19	Urban	2M+	$115,758	$21,525	$169,654	$306,937	11.17	$3,122,667
ON2	Urban	2M+	$266,764	$14,545	$84,549	$365,858	4.55	$1,299,232
ON20	Urban	100K - 500K	$22,866	$11,231	$81,609	$115,706	24.53	$2,722,033
ON21	Urban	500K - 1M	$134,767	$82,949	$822,283	$1,039,999	4.88	$4,040,249
ON22	Urban	100K - 500K	$148,451	$70,329	$752,758	$971,537	11.80	$10,491,799
ON3	Urban	2M+	$83,306	$7,400	$46,583	$137,290	18.42	$2,392,180
ON4	Urban	100K - 500K	$94,300	$50,000	$1,048,779	$1,193,080	5.09	$4,882,374
ON5	Urban	100K - 500K	$17,928	$16,099	$115,419	$149,447	8.05	$1,052,973
ON6	Urban	100K - 500K	$75,167	$62,108	$1,086,432	$1,223,707	5.96	$6,064,732
ON7	Urban	5K - 10K	$67,434	$46,903	$576,581	$690,918	2.52	$1,047,637
ON8	Urban	100K - 500K	$7,574	$193,859	$261,092	$462,525	1.86	$398,076
ON9	urban	100K - 500K	$54,434	$70,290	$959,523	$1,084,246	6.20	$5,633,337
PE1	Urban	50K - 100K	$133,942	$25,000	$382,278	$541,220	8.42	$4,014,757
QC1	Urban	100K - 500K	$42,193	$9,303	$234,184	$285,680	5.49	$1,283,024
QC2	Urban	500K - 1M	$48,147	$12,397	$282,311	$342,855	4.77	$1,290,934
QC3	Urban	2M+	$45,129	$9,033	$181,950	$236,112	6.92	$1,398,478
QC4	Rural	50K - 100K	$45,752	$7,760	$104,256	$157,768	11.86	$1,713,256
QC5	Urban	100K - 500K	$93,782	$12,740	$252,608	$359,130	5.89	$1,757,924
QC6	Urban	2M+	$208,529	$103,707	$560,266	$872,502	3.18	$1,903,716
QC7	Urban	2M+	$67,301	$6,346	$57,170	$130,817	9.06	$1,054,156
QC8	Urban	100K - 500K	$38,538	$4,625	$49,851	$93,014	9.40	$781,449
SK1	Urban	100K - 500K	$49,757	$2,807	$95,468	$148,032	15.89	$2,203,585
TOTAL			**$4,412,386**	**$1,082,611**	**$14,533,093**	**$20,028,091**		**$120,654,711**
AVERAGE			$81,710.85				**10.42**	**$2,234,347**
MEDIAN			$51,202.18				**7.96**	**$1,698,750**

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