



CANADIAN ASSOCIATION OF OPTOMETRISTS  
ASSOCIATION CANADIENNE DES OPTOMÉTRISTES

Association  
chiropratique  
canadienne



Canadian  
Chiropractic  
Association



Canadian  
Pharmacists  
Association

Association des  
pharmaciens  
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CANADIENNE

August 30, 2024

The Honourable Mark Holland, P.C., M.P.  
Minister of Health  
House of Commons  
Ottawa, ON  
K1A 0A6

Dear Minister Holland,

We are writing to you on behalf of a group of national associations representing health care workers, many of whom operate as small business owners. Our members are deeply concerned about the proposed changes to capital gains taxation announced in the 2024 federal budget, specifically regarding the implications for healthcare professionals who rely on their businesses as a significant component of their retirement planning. We have sent a similar letter to Deputy Prime Minister and Finance Minister Freeland in response to the August 12 Budget 2024 consultations launched by the federal government.

At a time when access to primary care is under significant strain, governments must use every possible tool to support the recruitment and retention of health professionals. The timing of the proposed changes will not only add additional financial burden on healthcare providers, but may also disincentivize individuals from establishing new practices, especially in rural and remote communities which are chronically under served.

The increase in the capital gains inclusion rate from one-half to two-thirds risks stifling innovation and entrepreneurship within these professions. Higher taxes on capital gains will reduce the resources available for healthcare professionals to invest in new equipment, technology, and training, ultimately limiting their ability to adapt to evolving patient needs and deliver optimal healthcare outcomes.

This tax measure, while intended to ensure fairness, may inadvertently place a heavier financial burden on those who have invested significantly in serving their communities in small, often rural, or underserved areas. It may also deter new and aspiring practitioners from entering the healthcare professions, which would be contrary to the intended effect of the recent changes in the federal budget.

Although beneficial, the proposed increase to the Lifetime Capital Gains Exemption (LCGE) to \$1.25M, may not fully offset the increased tax liabilities incurred by the higher inclusion rate of 67%. While we understand that this proposed measure attempts to provide a solution to Canada's deficit, it is shortsighted and complex. Many of our members plan their retirement based on the equity built in their businesses, and the new tax regime could significantly diminish the value they expect to derive from years of service.



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We appreciate your government's efforts to balance economic measures and support entrepreneurs. However, we strongly urge you to work with the Minister of Finance to consider the unique circumstances of the healthcare professionals we represent, who may not have the same financial backing or pension safety nets as other professionals and rely on capital gains for their retirement planning.

Furthermore, the proposed increase in the capital gains tax will deter investment in the Canadian economy at a time when it is most needed for recovery and growth. Community healthcare clinics and small businesses are engines of economic activity and job creation. By imposing higher taxes on the returns generated from these investments, the government risks undermining the very businesses that are essential to rebuilding our economy.

We urge the government to

1. Conduct a thorough reassessment of the impact of these tax changes on healthcare professionals.
2. Carve out an exemption for healthcare professionals from the proposed capital gains tax changes to ensure that they can support their continued commitment to community health services.

We are committed to working collaboratively with your office, the Finance Minister's office and other stakeholders to find balanced solutions that support both our healthcare system and the financial security of healthcare providers.

Thank you for considering our concerns. We look forward to your response and hope for an opportunity to discuss this further.

Sincerely,

François Couillard  
Chief Executive Officer  
Canadian Association of Optometrists

Dr. Ayla Azad  
Chief Executive Officer  
Canadian Chiropractic Association

Glen Doucet  
Chief Executive Officer  
Canadian Pharmacists Association

Dr. Aaron Burry  
Chief Executive Officer  
Canadian Dental Association