



## Pre-Budget Consultations for 2025

To the Department of Finance Canada  
90 Elgin Street  
Ottawa, ON K1A 0G5

Sent by email: [yourbudget-votrebudget@fin.gc.ca](mailto:yourbudget-votrebudget@fin.gc.ca)

March 6, 2025

To whom it may concern,

On behalf of Pregnancy Care Canada, I respectfully submit concerns regarding recommendations 429 and 430, noted in the [December report of the Standing Committee on Finance](#).

**Recommendation 429:** No longer provide charitable status to anti-abortion organizations.

**Recommendation 430:** 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.

Recommendation 429 does not define the scope of this proposal, leaving it unclear how an organization will be classified as “anti-abortion.” Pregnancy Care Canada, along with our 81 affiliated pregnancy care centres, offers alternatives to abortion. This essential distinction provides reproductive options and support for Canadian women of diverse faiths and religions who may feel uncertain about their pregnancy decision due to various stressors, including financial insecurity, relationship instability, housing insecurity, and more. The free support available at local pregnancy care centres is crucial to providing a national safety net for women looking for support for an unexpected pregnancy.

I assume that Recommendation 429 is based on the 2021 Liberal Policy Platform, which states,

“A re-elected Liberal government will no longer provide charity status to anti-abortion organizations (for example, Crisis Pregnancy Centres) that provide dishonest counselling to women about their rights and about the options available to them at all stages of the pregnancy.”<sup>1</sup>

Our response to this Liberal platform is included below in Document A. Notably, as major stakeholders in this area, we should participate in the conversation to address the concerns raised and determine the best ways to ensure

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<sup>1</sup> <https://liberal.ca/wp-content/uploads/sites/292/2021/09/Platform-Forward-For-Everyone.pdf>



honest support for vulnerable women facing unexpected pregnancies. We assume you are seeking a well-rounded perspective.

On Tuesday, October 29, 2024, The Liberal government released proposed legislative changes “to require more transparency” from charities providing pregnancy care services.

*“Specifically, registered charities whose purpose or one of their main activities is to provide pregnancy and reproductive health supports and services, including pregnancy options counselling, would be required to explicitly **disclose if they do not provide abortions, birth control, or referrals to these services.***

*Organizations that do not clearly and prominently provide the required transparency risk losing charitable status.”<sup>2</sup> (Emphasis added.)*

We issued a media release detailing our concerns. Please see Document B below.

Who is helped at pregnancy care centres? In 2024,

- 48,572 client visits, including women and men from diverse faiths and religions who sought help at PCC-affiliated pregnancy care centers.
- 7,909 clients received material supplies, such as diapers, formula, and clothing.
- 1,441 clients were supported through parenting programs.
- 522 women requested and received support after their abortion.

Finally, concerning Recommendation 430, we urge the Finance Minister to carefully consider the societal benefits of religious charities and the harmful impact such a decision would have on vulnerable Canadians, including the women, men, and families served daily at local pregnancy care centres, thousands of whom receive practical supplies and support at no cost.

I encourage you to review the Cardus report by Mike Wood Daily, titled “[Why Religious Tax Exemptions Benefit All Canadians](#),” dated November 12, 2024.

On behalf of Pregnancy Care Canada,

**Laura Lewis MD, CCFP**

**Executive Director**

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<sup>2</sup> This action was introduced in Parliament by the Hon. Chrystia Freeland, Deputy Prime Minister and Minister of Finance, and the Hon. Marci Ien, Minister of Women and Gender Equality and Youth.



## Document A



November 16, 2021

**Attention: Liberal Party of Canada**

**Hon. Diane Lebouthillier**, Minister of National Revenue

**Hon. Chrystia Freeland**, Deputy Prime Minister

**Ms. Suzanne Cowan**, NBD President

c. **Hon. Karina Gould**, Minister of Families, Children, and Social Development

c. **Hon. Marci Ien**, Minister for Women and Gender Equality and Youth

High priority communication. An expedited reply is requested. Thank you for your attention to this matter.

**Re: Charity Status Revocation from Crisis Pregnancy Centres**

### Introductions

Pregnancy Care Canada (PCC) is a national best practice association for 81 affiliated pregnancy care centres across Canada. Pregnancy care centres are also known as crisis pregnancy centres.

For an explanation of who we are and what we do, we refer you to our 5-page publication at this link:

[Frequently Asked Questions and Clarifications](#). (note: link updated)

### Our Request

We are seeking needed clarification on the government's intention regarding pregnancy care centres.

A public release from the Liberal Party of Canada suggests that a re-elected Liberal government will direct the Canada Revenue Agency to revoke the charity statuses of crisis pregnancy centres. Such an action may affect the existence of our national charity and our PCC-affiliated centres.

On page 4 of your Liberal Party platform:



"A re-elected Liberal government will no longer provide charity status to anti-abortion organizations (for example, Crisis Pregnancy Centres) that provide dishonest counselling to women about their rights and about the options available to them at all stages of the pregnancy."

## **Revocations**

Responding to the concerns specified in your platform pledge, it is our understanding that your goal is for women to be treated with honesty and integrity. Specifically, your platform identifies a plan to revoke charity status from pro-life charities (and pro-choice charities, we assume) which intentionally provide "dishonest" counselling/information about women's "rights" and "options" at all stages of pregnancy. We stand in agreement with honest and ethical practices.

Our own PCC Policy dictates disaffiliation if a member centre is found engaging in unethical, deceptive practices. It would be our role to investigate, converse, provide guidance, and promote resolution should this be evidenced in one of our centres. Disaffiliation would ensue, if warranted.

## **PCC Options Information**

Our content – on pregnancy, fetal development, abortion, adoption, and parenting – is reviewed and updated on a regular basis. Importantly, our client options brochure has been co-written and/or proofread by 45 healthcare professionals, nationwide. These practitioners include medical ethicists, obstetricians, gynecologists, maternity physicians, perinatal nurses, and adoption agency personnel.

Please consider reviewing, along with your Board, and perhaps also with your Liberal Party's medical advisors: [Abortion Adoption Parenting: An Informational Guide for Unexpected Pregnancy](#). (link updated February 2025)

Viewing our linked 'FAQs' document and our 'Abortion Adoption Parenting' brochure, will confirm our commitment to providing medically accurate information on "all stages of pregnancy."

NOTE: We will be pleased to have a number of the contributing co-authors be made available for you, for your Board – including any interested MPs – by means of a teleconference meeting. These physicians and perinatal nurses (who are external to our PCC charity) will answer your questions re: content accuracy.

## **Crucial Questions**

Would you please respond to our following four questions? Your feedback and direction for us is appreciated.

1. Are you still proceeding with the revocation of charity status from some crisis pregnancy centres; and if so, what is the process you will apply to determine "dishonest counselling"?
2. What measures have been considered to ensure such a policy will adequately differentiate between organizations, such as Pregnancy Care Canada and our PCC-affiliates, which provide accurate information on women's "rights" and "options" at all stages of pregnancy, and other organizations, which may not?



3. As the national best practice association for PCC-affiliates, will you allow us an opportunity to participate in discussions concerning these determinations and how best to move forward on our shared goal of honesty?
  
4. Would additional information – in writing or by teleconference interviews – from the healthcare practitioners who co-wrote, co-write, and endorse our PCC literature, be helpful?

### **Conclusion**

As conveyed in our 'FAQs' document, PCC-affiliated centres have provided compassionate and practical support for hundreds of thousands of women, men, and children. The cumulative charitable impact – financial, familial, social, and civic – is significant.

We trust that the Liberal Party of Canada will allow us to continue to help those who voluntarily come to pregnancy care centres for information, for resources, for encouragement, and for individualized care. And we welcome the opportunity to dialogue with you regarding ways to improve the provision of support to vulnerable individuals.

On behalf of the board of directors for Pregnancy Care Canada, we thank you.

**Laura Lewis, MD, CCFP**

Executive Director

**Michele Dawson, RN**

Board Member



## Document B

### Media Release from Pregnancy Care Canada

October 30, 2024

#### False labels and mischaracterizations don't help women: Response to the Government of Canada

The Liberal Government announced on Tuesday, October 29, 2024, proposed legislative changes “to require more transparency” from charities providing pregnancy care services.<sup>3</sup>

*“Specifically, registered charities whose purpose or one of their main activities is to provide pregnancy and reproductive health supports and services, including pregnancy options counselling, would be required to explicitly **disclose if they do not provide abortions, birth control, or referrals to these services.***

*Organizations that do not clearly and prominently provide the required transparency risk losing charitable status.”<sup>4</sup> (Emphasis added.)*

We respectfully ask Prime Minister Trudeau and Ministers Freeland and Ien to stop using false labels and mischaracterizations of the good work done daily across Canada at local pregnancy care centres and online. Their words impede the access, freedom, and choice of the very women they claim to protect. Canadian women deserve better, and Canadians expect more from their leaders than to see charities used as a pre-election political wedge.

Although we have ideological differences, Pregnancy Care Canada (PCC) agrees that medically accurate information and transparency of services are important.

Pregnancy Care Canada is a national, best-practice, faith-based affiliation of 80 local pregnancy care centres and online support. From our perspective, the government is manufacturing an issue that doesn't exist to divide and mislead Canadians. The disclosure requirements outlined in their backgrounder “*Protecting reproductive freedom by preventing abuse of charitable status*”<sup>5</sup> are already part of our recommended best practices, and have been for years.

All PCC-affiliated centres agree annually to our Commitment of Care and Competence. PCC-affiliated centres offer a safe environment for a woman to make a pregnancy decision that is fully informed, evidence-based, and free from external pressure. Centres respect a woman's right to make her own decision and provide her with medically accurate information on all three options: abortion, adoption, and parenting.

Before receiving services at a PCC-affiliated pregnancy care centre, every client reads a Limitation of Services form, which clearly indicates that the centre does not provide or assist in arranging abortions. In addition, every centre

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<sup>3</sup> This action was introduced in Parliament by the Hon. Chrystia Freeland, Deputy Prime Minister and Minister of Finance, and the Hon. Marci Ien, Minister of Women and Gender Equality and Youth.

<sup>4</sup> *Protecting reproductive freedom by preventing abuse of charitable status*, Canada.ca, <https://www.canada.ca/en/department-finance/news/2024/10/protecting-reproductive-freedom-by-preventing-abuse-of-charitable-status.html>

<sup>5</sup> <https://www.canada.ca/en/department-finance/news/2024/10/protecting-reproductive-freedom-by-preventing-abuse-of-charitable-status.html>



affiliated with PCC must provide a disclaimer on their website, which states that the centre does not provide or assist in arranging abortions.

If a client chooses to pursue an abortion, a PCC-affiliated centre will not mislead or obstruct this decision. If a client requests help in obtaining an abortion, she is advised to consult the appropriate professional. She is also encouraged to return for post-abortion support if desired.

Clients are referred to their primary care physician if their needs are outside the centre's scope of care. This includes requests for medication or birth control.

For accuracy and accountability, Pregnancy Care Canada's *Pregnancy Options Guide*, the primary resource for pregnancy options discussions with clients, has been reviewed by 80 specialized practitioners in Canada, including perinatal nurses, family physicians, obstetrician-gynaecologists, medical ethicists, psychiatrists, psychologists, and social workers.

### **Who is helped at pregnancy care centres? In 2023,**

- 48,855 women and men of diverse faiths and religions accessed help at PCC-affiliated pregnancy care centres.
- 7,980 clients received material supplies, such as diapers, formula, and clothing.
- 1,484 clients were supported through parenting programs.
- 418 women requested and received support after their abortion.

All of these services were voluntarily requested and provided free of charge.

Regardless of one's ideological views, local pregnancy care centres must not be overlooked for their charitable value and support of thousands of individuals every year.

For a woman to truly have reproductive freedom and choice regarding her unexpected pregnancy, she must have authentic options to choose from – including the option to continue her pregnancy, receive support, and not feel pressured into an unwanted abortion.

On behalf of Pregnancy Care Canada,

**Laura Lewis MD, CCFP**

**Executive Director**

*Since 2016, Dr. Lewis has been the Executive Director of Pregnancy Care Canada. After working as a family physician for 22 years, she saw the need for education, support, and practical options for women and men facing unexpected pregnancies. Dr. Lewis has an HonsBCom from Queen's University, a Medical Degree from the University of Western Ontario, and a certificate of Family Medicine from McMaster University.*