



eNews – September 15, 2025

STEP Canada Tax Technical Committee

RE: Legislative Amendment Request – EIFEL Excluded Entity Definition and Foreign Personal-Use Trusts

The Society of Trust and Estate Practitioners (Canada) sent a submission to Finance Canada on September 11th, 2025, which raises a concern regarding the application of the “excluded entity” definition in subsection 18.2(1) of the Income Tax Act, as interpreted by the Canada Revenue Agency in its technical interpretation 2025-1056861E5, dated June 30, 2025.

Many thanks to the members of the committee, Kenneth Keung (Chair), Sébastien Desmarais (Deputy Chair), and members of the STEP Canada Tax Technical Committee for their thoughtful review and contributions.

The STEP Canada Tax Technical Committee is pleased to share this submission with its members [here](#) and in the "Resources" Section in your MY STEP profile on step.ca.

Tax Technical Committee
STEP Canada

About STEP: The Society of Trust and Estate Practitioners is the leading international organization for trust and estates professionals. Headquartered in London, England, it has more than 22,000 members worldwide in over 100 countries.

STEP Canada, founded in 1998, has nearly 4,000 members with branches in the following cities and regions: Atlantic, Montreal, Ottawa, Toronto, Winnipeg, Saskatchewan, Calgary, Edmonton, and Vancouver, with chapters in Okanagan Valley, and Southwestern Ontario. STEP is a multidisciplinary organization with the most experienced and senior practitioners in the field, including lawyers, accountants, financial planners, insurance advisors, and trust professionals. They provide domestic and international advice on trust and estates, including planning, administration, and related taxes.