



## Bare Trust Filing Requirements - Update

The CRA announced that it is once again holding off on requiring Canadians to file T3 tax forms for bare trusts for tax year 2025. You will recall the CRA first decided to pause the bare trust filing requirements in the middle of a chaotic 2024 tax filing season.

The CRA also indicated that once the agency has certainty about the proposed legislative changes (see press release below), the CRA will, as recommended by the Taxpayer's Ombudsperson, revisit the possibility of creating a return specific to bare trusts. The EFILE Association of Canada supports the creation of a simplified return specific form.

### CRA Press Release – December 16, 2025: Proposed amendments related to trust reporting

On November 18, 2025, the Government of Canada tabled Bill C-15, An Act to implement certain provisions of the budget tabled in Parliament on November 4, 2025, with proposed amendments to the Income Tax Act (ITA) that relate to trust reporting.

Based on proposed legislation in Bill C-15, and consistent with the Explanatory Notes Relating to the Income Tax Act and Other Legislation published by the Department of Finance, the CRA does not expect bare trusts to file a T3 Trust Income Tax and Information Return (T3 return) including Beneficial Ownership Information of a Trust (Schedule 15) for taxation years ending in 2025. Certain bare trusts will be required to file for taxation years ending on or after December 31, 2026.

Among other proposed changes, for taxation years ending on or after December 31, 2025, certain trusts

may not be required to file a T3 return if specific conditions are met. Where those conditions are not met and a T3 return is required to be filed, these trusts will not be required to file Schedule 15 with their T3 return for taxation years ending on or after December 31, 2025. These trusts include, but are not limited to:

- Trusts holding assets with a total fair market value (FMV) that does not exceed \$50,000 throughout the year;
- Trusts holding only the specific asset types as outlined in proposed paragraph 150(1.2)(b.1) of the ITA for the applicable taxation year, with a total FMV that does not exceed \$250,000 throughout the year, provided certain additional conditions are met;
- Specific client trust accounts holding only the specific asset types as outlined in proposed paragraph 150(1.2)(c) of the ITA for the applicable taxation year, with a total FMV that does not exceed \$250,000 throughout the year;
- Trusts established to comply with a statute of Canada or a province where the persons acting as trustee hold the property in trust for a specified purpose, such as those of bankruptcy trustees or provincial guardians.

The CRA confirms that taxpayers may voluntarily file under current law, pending the enactment of Bill C-15. If the proposed legislative changes are not enacted, the CRA will provide further direction at that time.

A bare trust is a type of trust that is essentially a principal-agent relationship. In a bare trust, the beneficiary controls the trust property, and the trustee does not have any power or discretion over the property. The trustee is merely holding legal title of the property for the beneficiary. ★

## Backup MFA Option to be Required for Account Users

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As simple good practice management, tax preparers should enroll in more than one multi-factor authentication (MFA) option.

Enrolling in multiple MFA options helps ensure that you can still access CRA sign-in services if you change your phone number, misplace your passcode grid, or delete the third-party authenticator app.

If you don't have access to your old phone number and you are not enrolled with another MFA option, you will have to contact your designated EFile Helpdesk. Not ideal during the height of tax season.

CRA recently released new MFA protocols for CRA account users.

Starting in February 2026, CRA account users will be required to have a back-up MFA option on file, such as a passcode grid or third-party authenticator app. We recommend all CRA account users add a back-up MFA option prior to the reopening of EFILE on February 23.

When CRA account users log in to their CRA account they will be prompted to add a back-up MFA option before they are able to access their account.

They can choose between a passcode grid or a third-party authenticator app. Telephone will not be an available back-up MFA option, although users can continue to use MFA by phone as their primary MFA option.

To add a back-up MFA option to a CRA account:

- Sign in to your CRA account
- Select Security settings on the Welcome page
- Select Multi-factor authentication
- Follow the instructions to add either a passcode grid or third-party authenticator app as your back-up MFA option.

The CRA is promoting the new requirement as “one of the ways the CRA is improving account security while also prioritizing a taxpayer's ability to self-serve”. ★

## Register Again Protocol for Online Access

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The Register Again online self-serve option for existing CRA account users is now available.

The option allows individuals to self-serve and register again for a new My Account credential if they are locked out of their account or have forgotten their credentials.

Note that any previous CRA user ID and/or Sign-In Partners will be removed as a result of using the Register Again option. Provincial partner credentials will not be removed by this process.

### Protocol to Register Again for online access

You may be able to regain access to your CRA account with new sign-in information (a new credential) if one of the following applies:

- You forgot your CRA user ID or password;
- You forgot the answers to your security questions;
- Your online banking information changed;
- Your credential was revoked.

To use Register Again, you will need to be able to:

- Use any existing MFA option you previously chose (you must have access to your existing MFA information to regain access to your account. If you do not, call the CRA);
- Complete the registration process which includes identity verification.

Note: You cannot use the Register Again process to get back into your account if your account has been locked by the CRA for security or other reasons. In this instance you need to contact the CRA.

If you have tried to register again and still cannot access your account, contact the CRA. ★

## Reminders for Efilers

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Reminders of important upcoming changes.

### Decommissioning the NOA in Tax Software Begins

Effective February 9, 2026, the CRA is eliminating the notice of assessment and/or reassessment (NOA and NORA) in EFILE and NETFILE tax software (Express NOA). The notice of assessment and/or reassessment will be available in My Account and RAC.

NOAs will be available for viewing exclusively in CRA portals right after the CRA receives and processes the tax return. If you do not have a CRA account or you set your preferences to letter mail, your notice of assessment and/or reassessment will be sent to the mailing address on file.

As a result of this change, Form T183, Information Return for Electronic Filing of an Individual's Income Tax and Benefit Return has been revised to remove the second checkbox in Part E, which previously allowed electronic filers to receive a one-time notice of assessment or reassessment through the EFILE-certified tax software.

If you select Express NOA in your tax software, you will get an error message, as the CRA is not recertifying previous years' software to remove the Express NOA option.

### EFILE Software Block Security Begins

Beginning in February 2026, the CRA will implement a process that associates EFILE accounts with specific certified T1 and T3 software products.

Once the Software Block is in place, if a T1 or T3 return is submitted using a different tax software product than the one linked to your EFILE account, the return will be rejected, and the transmission will fail. You will be required to call your EFILE Helpdesk to sort it out.

The Software Block security enhancement applies to all years accepted by EFILE (tax years 2018 to 2025) and ReFILE (tax years 2022 to 2025). You can

associate more than one tax software to your EFILE account.

This enhancement is designed to reduce fraud by strengthening the security of tax returns filed by ensuring that the Efiler submits tax returns through the specific tax software product associated with their EFILE account.

Application of this security feature will occur when you renew your EFILE account and will vary for existing EFILERS and new EFILERS.

During the 2025 renewal process for existing EFILE accounts, the CRA will automatically associate your EFILE account with your software product based on your historical usage. If you wish to update or change your tax software product preferences at any time, you will need to contact your EFILE helpdesk. Your EFILE account renewal indicates which EFILE helpdesk applies to you.

New EFILE registrants will be able to identify their preferred software products during screening with the EFILE helpdesk. ★

## Filing and Payment Deadline

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The EFILE and REFILE system for T1 returns will shut down for annual maintenance on Friday, January 30, 2026 (11:59PM ET).

EFILE and ReFILE will re-open on **Monday, February 23, 2026** (8:30AM ET) for the electronic filing of 2018, 2019, 2020, 2021, 2022, 2023, 2024 and 2025 T1 returns and ReFILE of 2022, 2023, 2024, and 2025 amended T1 returns.

The EFILE system for T3 transmissions also closes for maintenance on Friday, January 30, 2026 until February 23<sup>rd</sup>.

Note that while the acknowledgment of an electronically filed return is issued in Eastern Time, a return is considered filed on time if the CRA receives it on or before April 30 in the respective Canadian time zone.

Payments to the CRA are considered on time if the CRA receives it, or a Canadian financial institution processes it, on or before April 30th, 2026.

Self-employed taxpayers and their spouse or common-law partner have until Monday June 15, 2026, to file their income tax return. ★

### Summary of Available Filing Methods

Tax Year =>	2017	2018	2019	2020	2021	2022	2023	2024	2025
T1 EFILE	X	✓	✓	✓	✓	✓	✓	✓	✓
ReFILE						✓	✓	✓	✓
AFR	✓	✓	✓	✓	✓	✓	✓	✓	✓
T3 EFILE					✓	✓	✓	✓	✓
Change My Return	Online adjustment requests accepted for the 10 previous calendar years (via RAC).								

#### Notes:

- AFR only pulls in slip information for prior years, not CDE information. CDE screens only populate in the current year.
- Tax year 2017 eliminated from EFILE and NETFILE. According to the CRA, it is not cost effective to build and maintain the system for older years with very little take-up. Going forward, the maximum years available for EFILE will be a rolling 8 years.

## 2026 Efiler's Resource Guide now Available

The 2026 Efiler's Resource Guide will be available in PDF format in the Library section of our website on January 27<sup>th</sup>. Simply log in to [www.efile.ca](http://www.efile.ca) and gain access to your digital copy (in PDF format).

In our 2025 Annual Survey of Efilers we surveyed the membership about moving towards producing a digital only copy of the Efiler's Resource Guide. The results were clear: 89% of respondents favoured the move away from a paper copy.

Moving from paper to digital format is not only environmentally sound, it allows us to produce a guide with more content and weblinks. It also makes searching for specific info within the guide much easier.

While transitioning away from a paper copy format of the guide, we will make limited print copies available for purchase for \$20 each (price includes taxes and shipping). Additional copies are \$15 (price includes taxes and shipping).

To order paper copies, please etransfer payment to [swatson@efile.ca](mailto:swatson@efile.ca). Be sure to include your contact details in the message section of your etransfer so we can match it to your account. Receipts will be issued via email.

Annual Membership Certificates, the EAC desktop calendar and our NEW 2026 Tax Preparer's Reference Sheet will be sent via Canada Post beginning the week of January 26<sup>th</sup>. ★

## 33<sup>rd</sup> Efile Association of Canada Annual General Meeting set for Wednesday, September 23, 2026

Save the date for the 33<sup>rd</sup> Annual General Meeting of the *EFILE Association of Canada / Association de TED du Canada* to be held **on Wednesday, September 23, 2026**, in Ottawa, Ontario.

Registration for the meeting is not required and there is no cost to attend. Senior CRA managers are expected to attend and take questions after the

meeting, so this is your chance to share your views and get some answers.

Full details will be provided in the July 2026 *IMPACT* Newsletter. ★

## Welcome New Members

**W**e dedicate this section to all our new members. Welcome to the EAC!

Outlined below is an overview of the work the EAC completes on your behalf and how it is reported back to you.

The EAC has been representing tax professionals from all regions of Canada to senior management of the CRA for over thirty years. Formed in 1993, the EAC is a federally registered non-profit corporation with a membership that fully represents the EFILE industry: from sole proprietors to large nationwide firms.

One of the primary goals of the EAC is to facilitate the operation of a tax practice. Running a successful tax practice takes more than strong management and excellent technical skills; it requires coordination between the CRA and front-line administrators of Canadian tax policy, i.e. tax preparers.

The EAC is governed by a **national 15-member Board of Directors** elected by the membership of the EAC at the Annual General Meeting (AGM). Members of the Board of Directors serve renewable three-year terms.

The AGM is held during the 3rd week of September. The location of the AGM alternates east and west across Canada to facilitate our membership in attending.

Our primary method of communication with the membership is through our *IMPACT* newsletter. The **newsletter is published three times a year** in January, July and November, and provides important updates on developments within the tax and EFILE service industry. It is e-mailed as a PDF to all members. Back editions of the newsletter can be found in our online Library ([www.efile.ca](http://www.efile.ca)).

The membership package, mailed out every January, includes your annual **EAC Membership Certificate**, ready for framing and displaying to your clients. Membership with the EAC shows your commitment to excellence in tax preparation.

The membership package also includes a copy of the **EAC Desktop Calendar**, as well as our annual **Tax Preparer's Reference Sheet**. All members also receive access to our indispensable annual **EFileer's Resource Guide**.

In July every year, we survey our members via email and document the issues and irritants that hinder their work. This information forms the basis of the **EAC Annual Submission** to the CRA and subsequent meetings with senior management of the CRA. Through the EFile Association of Canada, **you have a voice** with the CRA.

The July newsletter includes a summary of the issues and irritants submitted to the CRA. It also contains official notice of the upcoming AGM, as well as the **EAC Nomination form for the election of Directors** at the upcoming AGM. At every AGM five vacancies are filled.

Our November newsletter provides a detailed summary of our AGM and subsequent meetings with senior management of the CRA. This includes a **summary of new enhancements to the EFILE system for the upcoming tax season**. You will have advance notice of the changes to come. ★

## EAC Marketing

**O**n your letterhead, website and social media advertising, include the EAC member logo.

To obtain a digital logo, or an EAC door decal, please email [info@efile.ca](mailto:info@efile.ca) with your request. ★

