



June 20, 2024

The Honourable Randy Boissonnault  
Minister, Employment and Social Development Canada  
**Ministry of Employment and Social Development Canada**  
140 Promenade du Portage Gatineau,  
Quebec K1A 0J9

**RE: Canada Summer Jobs Program**

Dear Minister Boissonnault:

The purpose of this letter is to provide information on the legal status of Business Improvement Areas (BIAs) for the Canada Summer Jobs Program. While there are Business Improvement Areas, under the names of BID, BIZ, SDC, and BIAs in all provinces of Canada they are all under differing legislation within their specific provinces\*.

In Ontario, All Business Improvement Areas (BIAs) are incorporated by their municipalities as “corporations” and “local boards” of the municipality pursuant to section 204(2) and (2.1) of the [Municipal Act, 2001](#). BIAs are incorporated by their local municipalities as “not-for-profit” corporations to oversee the improvement, beautification, and promotion of their designated areas within their respective municipalities, independently funded by the commercial property owners and their tenants who become the “members” of a BIA. The independent funding, however, comes through a ‘special levy’ as administered by the Municipality and provided to the BIA Board of Management whose mandate is to make the area a better place to work, live and play. Please see our [“What is a BIA” video](#) which may provide more context.

We understand that in the context of certain grant programs, an incorporation number is requested to confirm eligibility. Ontario’s BIA Boards are incorporated under the Municipal Act, 2001 by the municipality and not under other incorporating provincial or federal legislation which provides a resulting “incorporation number”. Section 204(2) of the Municipal Act, 2001, as well as each BIA’s constituting by-law enacted by their municipality under the authority of the Act, state that BIA Boards are “corporations”. While BIAs are not incorporated not-for-profit organizations under the Ontario [Not-for-Profit Corporations Act, 2010](#) (ONCA) or the [Canada Not-for-profit Corporations Act](#) (CNCA), they are independently funded by their members and operate as not-for-profit for the betterment of their community.

As such, our 300 plus BIAs across the Province provide festivals and events that are open to all (usually at no charge), invest in the public realm and provide leadership in the economic vitality of the area.

Our BIAs, therefore, through this unusual status, are self-funded and are limited in the funding they can receive. However, the Canada Summer Jobs program is a lifeline for BIAs. Across Canada\*, many BIAs (BIDs) are for the most part, not-for-profit corporations, with a few exceptions (one being Ontario where we are under the Municipal Act). Regardless of location, in Canada, all BIAs are self-funded and therefore underfunded with limited staffing. Our BIAs annually look forward to mentoring staff in learning about how a BIA works and teaching youth about the importance of giving back to the local economy and community. **Therefore, OBIAA is seeking that every BIA in the Province be recognized as Not-For-Profit, or a new status be added to the Canada Summer Job application process, that of a BIA.**



ONTARIO BUSINESS IMPROVEMENT AREA ASSOCIATION

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We trust that this letter provides clarification on the status of BIAs to facilitate their applications for grant programs which require confirmation of incorporation and not-for-profit status.

If more clarity is required, we look forward to consulting with you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kay Matthews'.

Kay Matthews  
Executive Director  
**Ontario BIA Association**

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