

AN OVERVIEW OF THE CANADA REVENUE AGENCY'S VOLUNTARY DISCLOSURES PROGRAM*

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Canada's income tax system requires taxpayers to self-assess and report their income tax liabilities in respect of each taxation year. Where a taxpayer has previously provided incorrect or incomplete information, or has failed to disclose required information entirely, to the Canada Revenue Agency (the "CRA"), the taxpayer may, under certain circumstances, be permitted to come forward and voluntarily disclose past reporting errors or omissions in exchange for potential penalty (and, in limited circumstances, interest) relief by making an application to the CRA under the federal "Voluntary Disclosures Program" (the "VDP"). Subject to certain qualifying conditions, the VDP may be of particular interest to an executor that wishes to file income tax returns where the deceased or a former trustee has failed to do so. This article provides a general overview of the conditions that a taxpayer must satisfy in order to be eligible to make a valid voluntary disclosure.

1. Statutory Basis for the VDP

Subsection 220(3.1) of the *Income Tax Act* (the "*Tax Act*")¹ provides the statutory basis for the VDP² in respect of Canadian income taxes. In order to be eligible for relief under subsec. 220(3.1), the following pre-conditions must be satisfied: (i) the applicant must be a taxpayer, which includes individuals, corporations, trusts and, for the purposes of subsec. 220(3.1), partnerships, regardless of whether the taxpayer is liable or not for tax; and (ii) the application

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1. R.S.C. 1985, c. 1 (5th Supp.), as amended. All statutory references are to the *Tax Act*, unless otherwise indicated.

2. Taxpayer relief under the VDP may also be available in respect of penalties and interest imposed under other Canadian tax statutes such as the *Excise Tax Act*, R.S.C. 1985, c. E-15; *Excise Act, 2001*, S.C. 2002, c. 22; *Air Travellers Security Charge Act*, S.C. 2002, c. 9, s. 5 and the *Softwood Lumber Products Export Charge Act, 2006*, S.C. 2006, c. 13; however, the scope of this article is limited to taxpayer relief under the VDP in respect of penalties imposed under the *Tax Act*.

for relief must be made within 10 calendar years from the end of the year in respect of which the taxpayer is seeking relief (e.g., if an application for relief was made on March 1, 2011, relief is only available in respect of the 2001 and subsequent taxation years).³

Under subsec. 220(3.1), the CRA has the discretion to “waive or cancel all or any portion of any penalty or interest otherwise payable under [the Tax] Act”. While a taxpayer may realize significant relief under subsec. 220(3.1), whether any relief is granted is at the discretion of the CRA and is, therefore, uncertain.

One method by which the CRA exercises the discretion afforded by subsec. 220(3.1) is through the VDP. The relief available under the VDP is administrative relief and the CRA has published guidelines to assist taxpayers in determining whether relief under the VDP may be granted in a particular set of circumstances. While the guidelines may be of assistance in understanding the CRA's views, and the likely application of the CRA's discretion, they are not binding on the CRA and may not restrict the “spirit or intent” of subsec. 220(3.1).⁴

2. VDP Guidelines

The stated purpose of the VDP is to promote voluntary compliance with Canada's tax laws by encouraging taxpayers to come forward and correct previous inaccuracies or omissions in their past reporting to the CRA. Generally, where a taxpayer makes a valid voluntary disclosure under the VDP, the taxpayer will be required to pay all tax outstanding, plus, in most circumstances, interest applicable in respect of the tax to be paid, but will not be liable for penalties or subject to prosecution under the *Tax Act*.⁵

3. VDP Conditions

The CRA will consider a voluntary disclosure made under the

3. See, for example, *Telfer v. Canada Revenue Agency*, [2008] 2 C.T.C. 309, 2008 D.T.C. 6192, 2008 FC 218, rev'd on other grounds [2009] 4 C.T.C. 123, 2009 D.T.C. 5046, 2009 FCA 23, leave to appeal to S.C.C. refused [2009] 2 S.C.R. x, 399 N.R. 391n; and *Bozzer v. M.N.R.*, 2010 D.T.C. 5025, 2010 FC 139, 186 A.C.W.S. (3d) 273 (currently under appeal).

4. See, for example, *Peter Pond Holdings Ltd. v. Canada (Attorney General)*, 2010 D.T.C. 5014, 2010 FC 5, 183 A.C.W.S. (3d) 1169; *Maple Lodge Farms Ltd. v. Canada*, [1982] 2 S.C.R. 2, 44 N.R. 354, 15 A.C.W.S. (2d) 215; CRA, Information Circular IC00-1R2, *Voluntary Disclosures Program* (October 22, 2007), at para. 7 (“IC”), online: <<http://www.cra-arc.gc.ca/E/pub/tp/ic00-1r2/ic00-1r2-e.pdf>>.

5. IC, *ibid.*, at para. 8.

VDP to be valid where it satisfies each of the following four conditions:

1. the disclosure is made voluntarily;
2. the disclosure is complete;
3. the disclosure involves the application or the potential application of a penalty; and
4. the disclosure includes information that is: (i) at least one year past due, *or* (ii) less than one year past due and is in respect of a previously filed return that contains information that is at least one year past due.

Each of the conditions for a valid voluntary disclosure is discussed in greater detail below.

(a) The Disclosure is Made Voluntarily

The CRA considers a disclosure to have been made voluntarily where a taxpayer “wholly initiated the disclosure in order to ensure his or her tax records are complete before enforcement action has been initiated that could lead the CRA to the issue being disclosed”.⁶ “Enforcement action” is broadly defined by the CRA to include, among other things, (i) an audit or investigation by the CRA; (ii) requests, demands or requirements for information issued by the CRA in respect of unfiled returns, unremitted taxes/instalments, deductions required at source, or non-registrants; (iii) requests, demands or requirements for information that have been issued with reference to other tax accounts of the taxpayer, partners of the taxpayer, or a corporation associated with, or related to, the taxpayer; (iv) direct contact by a CRA employee in respect of any non-compliance issue; or (v) an audit, investigation or other enforcement action by another authority or administration, such as the police, a securities commission or a provincial authority.⁷

A disclosure will not be considered to be voluntary where, prior to making the disclosure, a taxpayer was aware of, or had knowledge of, enforcement action set to be commenced by the CRA (or another authority or administration) in respect of the information disclosed.⁸ Accordingly, where enforcement action has not been commenced, the validity of a disclosure is determined by the awareness or

6. CRA, *Voluntary Disclosures Program Guidelines* (June 2008), at 3.2.1 (“Guidelines”).

7. IC, *op. cit.*, footnote 4, at para. 33.

8. *Ibid.*, at para. 32.

knowledge of the taxpayer of impending enforcement action with respect to the information to be disclosed to the CRA.

Where, (i) enforcement action has commenced in respect of the taxpayer, a person associated or related to the taxpayer (including corporations, shareholders, spouses and partners), or a third party (where the purpose and impact of the enforcement action against the third party is sufficiently related to the taxpayer's contemplated disclosure); and (ii) the enforcement action is likely to have uncovered the information to be disclosed by the taxpayer, the CRA will not consider the disclosure to be voluntary.⁹ Where the enforcement action is in respect of third parties, the CRA does not appear to consider a taxpayer's knowledge of the enforcement action to be relevant to determining whether a disclosure may be considered voluntary for the purposes of the VDP. Consequently, subject to the commentary below, it may be possible that a taxpayer's disclosure is denied on the basis that it was not voluntary, despite the fact that the taxpayer had no knowledge of enforcement action having been initiated that may have uncovered the matters that are the subject of the disclosure.

There are certain circumstances in which the existence of prior or ongoing enforcement action will not necessarily invalidate a voluntary disclosure. The CRA has provided the following examples of situations in which a disclosure may be considered voluntary, despite past or ongoing enforcement action.¹⁰

1. There was a recent audit in respect of a specific issue, the taxpayer makes a disclosure in respect of a separate issue, and there is no correlation between the two issues (*e.g.*, the taxpayer was recently audited with respect to payroll source deductions and the taxpayer makes a disclosure concerning unremitted sales tax amounts).
2. A "large corporation" that is continually under CRA audit makes a disclosure; however, the information disclosed is not part of the audit protocol and, therefore, would not necessarily have been discovered during the current audit.
3. A taxpayer satisfies the CRA that a computer-generated request that the taxpayer file certain forms or remit certain amounts in respect of income tax, which was previously sent to the taxpayer by the CRA, was not received by the taxpayer.
4. A significant period of time has elapsed between the date a

9. *Ibid.*

10. Guidelines, *op. cit.*, footnote 6, at 3.2.4.

computer-generated request was sent to the taxpayer and the date of the disclosure (*e.g.*, the CRA abandoned the action referenced in the computer-generated notice).

Furthermore, the CRA will generally consider a disclosure to be voluntary where an audit or investigation is in its preliminary stages and the CRA's Audit or Enforcement Divisions can confirm that the taxpayer was not aware of the enforcement activity¹¹ (presumably this means that neither division has contacted the taxpayer with respect to the enforcement activity).

(b) The Disclosure is Complete

The CRA requires that a taxpayer's disclosure provide:¹²

. . . full and accurate facts and documentation for all taxation years or reporting periods where there was previously inaccurate, incomplete or unreported information relating to any and all tax accounts with which the taxpayer is associated.

Accordingly, a taxpayer may not limit a disclosure to select errors or omissions or to specific taxation years or reporting periods. Moreover, where the taxpayer is a corporation, the completeness condition must be satisfied in respect of all associated corporations. For instance, where the taxpayer controls another corporation, it is generally expected that all previously inaccurate, incomplete or unreported information in respect of the other corporation will also be disclosed.¹³

It is the CRA's policy that a voluntary disclosure will not be denied solely because it contains minor errors or omissions.¹⁴

Where an error or omission is in respect of several taxation years, the CRA has not provided clear guidance as to how many previous taxation years will be subject to reassessment. Generally, the CRA may consider reassessing all years in respect of which, (i) the "normal reassessment period" has not expired; or (ii) it is entitled to reassess the taxpayer outside the "normal reassessment period" (*i.e.*, all non-statute barred years).¹⁵

In order to reassess a taxpayer outside of the "normal reassessment period", the statutory exceptions in subsec. 152(4) must generally

11. *Ibid.*, at 3.2.4.1.

12. IC, *op. cit.*, footnote 4, at para. 35.

13. Guidelines, *op. cit.*, footnote 6, at 3.3.1.

14. For example, where a taxpayer discloses income of \$100,000 and it is later established that the taxpayer's income was \$108,000, the CRA considers the error to be minor. *Ibid.*, at 3.3.2.

15. *Ibid.*, at 3.3.5.

apply. It is not uncommon for the CRA to argue that it may reassess a taxpayer in respect of a statute-barred year on the basis that subpara. 152(4)(a)(i) applies because the taxpayer made a “misrepresentation that is attributable to neglect, carelessness or wilful default [. . .] in filing the return or in supplying any information under the [Tax] Act”.¹⁶ For instance, in *College Park Motors Ltd. v. Canada*,¹⁷ the corporate taxpayers applied for relief under the VDP in respect of their failure to disclose their liability for Part I.3 tax under the *Tax Act*. While the corporate taxpayers in *College Park Motors* were not individually large corporations, they were members of a group of associated corporations, which resulted in the taxpayers being subject to Part I.3 tax. The income tax returns and financial statements of the associated corporations were prepared by the same accountant, and a director of the taxpayers met with the accountant annually to review such documentation. Despite the fact that the court had “no doubt that [the director and the accountant] are both careful and conscientious people”, the court nonetheless upheld the CRA’s right to reassess the taxpayers’ statute-barred taxation years on the basis of subpara. 152(4)(a)(i). In reaching its conclusion, the court held that the taxpayers were careless because on the second page of their respective corporate income tax returns, there were questions relating to Part I.3 tax. In the court’s view, had the director reviewed the returns “as carefully as a wise and prudent taxpayer would”, he would have asked for an explanation of Part I.3 tax and would have learned that the taxpayers were, in fact, liable for the tax.

In light of the low threshold set by the court in *College Park Motors* for determining when a taxpayer has made a misrepresentation attributable to carelessness, taxpayers should consider the possibility that the CRA may seek to reassess taxation years outside the “normal reassessment period” prior to making a voluntary disclosure.

Where a disclosure involves an omission by a taxpayer, it is the CRA’s general policy that it will normally seek to only reassess the most recent six taxation years of the taxpayer. To reassess beyond the identified six-year period, the VDP officer is instructed to consider factors such as whether a significant portion of the omission relates to prior years, the taxpayer’s compliance history, knowledge and expertise, and the complexity and the duration of the non-compliance at issue.¹⁸

16. *Tax Act*, *supra*, footnote 1, at subpara. 152(4)(a)(i).

17. 2009 D.T.C. 1269, 2009 TCC 409, 179 A.C.W.S. (3d) 964 (“*College Park Motors*”).

18. Guidelines, *op. cit.*, footnote 6, at 3.3.5.4.

The CRA may also require that a taxpayer provide additional information or documentation for the purposes of verifying the completeness of a voluntary disclosure. During the course of the CRA's review of a voluntary disclosure, a taxpayer's disclosure may be sent to other CRA departments for verification.

(c) The Disclosure Must Involve the (Potential) Application of a Penalty

A taxpayer's disclosure must involve the application of a penalty, such as a late-filing penalty, a failure to remit penalty or an instalment penalty, or the potential application of a penalty, such as a discretionary penalty in respect of negligence.¹⁹

(d) "One Year Past Due" Requirement

A voluntary disclosure must include information that is, (i) at least one year past due; *or* (ii) less than one year past due and in respect of a previously filed return that contains information that is at least one year past due. For example, where an individual taxpayer fails to file a Canadian income tax return in respect of his 2009 taxation year on a timely basis (*i.e.*, by April 30, 2010), and files a disclosure in respect of such failure on August 1, 2010, the disclosure will not be accepted under the VDP because a year has not passed since the date that the taxpayer's 2009 income tax return was due. However, if the same taxpayer failed to file Canadian income tax returns in respect of his 2005 to 2009 taxation years, and the taxpayer filed a voluntary disclosure on August 1, 2010, the one year past due condition would be met and the CRA would consider waiving penalties or interest in respect of those years, including the 2009 taxation year.²⁰

4. Circumstances Excluded from the VDP

There are limited circumstances in which the CRA will not grant relief under the VDP, regardless of whether the disclosure meets the four conditions for validity outlined above. These circumstances include disclosures in respect of: (i) income tax returns where no taxes are owing or a refund is expected; (ii) provisions under the *Tax Act* that permit taxpayers to elect specific tax treatment; (iii) returns that must be filed under s. 216 of the *Tax Act*; (iv) advance pricing arrangements; (v) rollover provisions, which, as election provisions, allow a taxpayer to defer income that would otherwise arise on the

19. IC, *op. cit.*, footnote 4, at para. 38.

20. *Ibid.*, at paras. 40-41.

transfer of property to a taxable Canadian corporation (e.g., s. 85 of the *Tax Act*); (vi) returns that must be filed in the year of bankruptcy, and; (vii) post-assessment requests for penalty or interest relief.²¹

5. Valid vs. Invalid Disclosures

If a taxpayer's disclosure satisfies the four conditions for validity set out above, the CRA may approve the disclosure and may waive all applicable penalties. In accordance with its standing administrative practices, the CRA may also grant partial interest relief in respect of years preceding the most recent three years from the date of the assessment. Generally, the CRA may use its discretion to reduce the applicable interest rate by four per cent from the prescribed rate; however, in exceptional circumstances, an interest rate reduction of greater than four per cent may be granted.²²

Where all of the administrative conditions for acceptance of a voluntary disclosure are not satisfied, it is the CRA's policy to consider the disclosure to be invalid and to deny the disclosure. In such circumstances, a taxpayer may be liable for any tax owing and may be subject to penalties, interest and prosecution, if applicable.

A taxpayer should receive written notice from the CRA, indicating whether a disclosure has been approved or denied. If the CRA denies a disclosure, the notice should clearly set out the reasons for the denial. A taxpayer whose disclosure has been denied is entitled to a second level administrative review by the CRA and then judicial review of the CRA's decision. In addition, a taxpayer should receive a Notice of (Re)Assessment in respect of the information disclosed under the VDP, regardless of whether the disclosure was accepted or denied. Taxpayers are generally entitled to file a Notice of Objection in respect of any unanticipated assessments that result from a disclosure under the VDP.

6. Making a Voluntary Disclosure

A taxpayer, or a taxpayer's authorized representative, may apply for relief under the VDP by submitting a written, executed application to the Assistant Director, Enforcement Division of the CRA Tax Services Office that serves the taxpayer.²³ A taxpayer has

21. *Ibid.*, at para. 19; Guidelines, *op. cit.*, footnote 6, at 2.1.4.

22. Guidelines, *ibid.*, at 4.2.1 and 4.2.3.

23. For taxpayers served by a Tax Services Office located in the Atlantic Region of Canada, the VDP is centralized in, and all disclosures should be sent to, the Saint John Tax Services Office. For taxpayers served by a Tax Services Office located in the Province of Ontario or the Territory of Nunavut, the VDP

the choice of making a "named" disclosure or a "no-names" disclosure.

(a) "Named" vs. "No-Names" Disclosures

In a "named" disclosure, the identity of the taxpayer is revealed to the CRA in the initial submission requesting relief under the VDP. The taxpayer has 90 days from the "effective date of disclosure" to provide a full and complete disclosure.²⁴

In a "no-names" disclosure, the taxpayer has 90 days from the effective date of disclosure to disclose their identity and provide a full and complete disclosure. A no-names disclosure is advantageous because it allows a taxpayer to discuss its situation with a VDP officer and to gain a better understanding of the CRA's position on the potential availability of relief under the VDP and the implications of the taxpayer's disclosure being rejected (*e.g.*, potential penalties if the taxpayer's non-compliance is discovered by the CRA outside the VDP and the possible relief available under the VDP) without the taxpayer having to reveal its identity. Enforcement action commenced during the 90-day disclosure period in the context of a no-names disclosure will not disqualify a taxpayer from obtaining voluntary disclosure relief if all qualifying conditions are otherwise satisfied and the taxpayer completes the disclosure, on a named basis, in a timely manner.

Prior to a taxpayer revealing its identity, a VDP officer may

is centralized in, and all disclosures should be sent to, the St. Catharine's Tax Services Office. Otherwise, applications for relief should be sent to the Tax Services Office that has jurisdiction over the area where the taxpayer resides, which, for a business, is generally its operating address. See, Guidelines, *op. cit.*, footnote 6, at 1.7; IC, *op. cit.*, footnote 4, at para. 55.

24. The CRA considers that the "effective date of disclosure" is the earlier of: (i) the date the CRA receives a completed and signed Form RC199, *Taxpayer Agreement*; or (ii) the date the CRA receives a letter signed by the taxpayer or the taxpayer's authorized representative that contains information similar to the information in Form RC199.

The CRA requires that Form RC199 be attached to an application for relief under the VDP. The form provides information with respect to the identity of the taxpayer and, if applicable, the taxpayer's authorized representative and generally requires the taxpayer or their authorized representative to declare that the contents of the form are true and that they are not aware of any enforcement action that has begun against the taxpayer, a related party/entity or a third party where the action against the third party is sufficiently related to the disclosure.

Where a taxpayer is making a "no-names" disclosure, the taxpayer need only provide the first three characters of their postal code on Form RC199 and certain generic, indentifying information (*e.g.*, gender and age).

confirm verbally or in writing that, based on the information provided in the no-names disclosure: (i) nothing the taxpayer has disclosed would invalidate the disclosure under the VDP; and (ii) the CRA will reassess the taxpayer's relevant taxation years for a specific amount of income. However, the CRA considers that discussions on a no-names basis with a VDP officer are non-binding and, accordingly, a taxpayer must identify itself in order to receive a final determination from the CRA as to whether the disclosure is a valid voluntary disclosure. Before making a no-names disclosure, taxpayers should be aware of the CRA's policy that it will not consider subsequent "no-names" disclosures by a taxpayer in situations where the taxpayer previously made a no-names disclosure on the *same facts* and did not identify itself within the 90-day period.²⁵

(b) Timing

As set out above, a taxpayer has 90 days from the effective date of a disclosure under the VDP to provide full and complete disclosure to the CRA. It is the CRA's policy that a taxpayer must disclose its identity within the 90-day period, without exception. However, upon written request from the taxpayer or its authorized representative, the CRA may consider granting an extension of the 90-day period for the taxpayer to provide complete and full disclosure. Where a taxpayer fails to provide complete and full disclosure within the 90-day period or extended period, as the case may be, the CRA may: (i) commence enforcement action in the context of a named disclosure; or (ii) close the file in the context of a "no-names" disclosure. Where the CRA commences enforcement action, the taxpayer may be liable for any tax owing and may be subject to penalties, interest or prosecution, if applicable. A taxpayer whose "no-names" disclosure file was closed as a consequence of non-disclosure by the taxpayer remains at risk that the CRA will initiate enforcement action in respect of its non-compliance.

(c) Payment of Amounts Owing

The CRA expects that a taxpayer will pay any amount of tax and interest owing at the time a voluntary disclosure is finalized. Where the taxpayer does not pay such amounts at the time of the disclosure, interest will continue to accrue on the amount of tax owing and the

25. See IC, *op. cit.*, footnote 4, at paras. 26-30; Guidelines, *op. cit.*, footnote 6, at 2.2.

voluntary disclosure officer may contact a collections officer to arrange with the taxpayer the payment of any outstanding amounts.²⁶

(d) Second Disclosures

A taxpayer may only make a second disclosure under the VDP in limited circumstances. It is the CRA's policy to only consider a second disclosure if the taxpayer's non-compliance was due to factors beyond the taxpayer's control. Historically, the CRA required that a second disclosure be a named disclosure (*i.e.*, a taxpayer does not have the option of making a no-names disclosure) and that the taxpayer disclose the fact that this is its second application for relief under the VDP. However, the CRA recently stated that para. 46 of the IC, which sets out the CRA's historical position,

... is merely to advise taxpayers/registrants that they need to remain compliant after making a disclosure, however this does not limit the number or type of disclosures a taxpayer may make, if the reason for those disclosures are beyond the taxpayer's control. The VDP will continue to consider each request for a second disclosure by the same taxpayer on a case by case basis.²⁷

The CRA will generally not consider a second disclosure that pertains to the same issue as the first disclosure if the first disclosure was invalid because it was incomplete. In addition, the CRA will generally not grant interest relief in the context of a second disclosure.²⁸

7. Potential Changes to the VDP

On November 30, 2010, at the CRA Roundtable at the Canadian Tax Foundation's Annual Tax Conference, the CRA stated that "a revised VDP information circular will be forthcoming to clarify a number of issues which have been brought to our attention since the last revision of the IC in 2007". The CRA has also expressed an ongoing desire to ensure that the integrity of the VDP is maintained.

The VDP is a program within the Enforcement and Disclosures Directorate (the "EDD") of the CRA's Compliance Programs Branch. In the CRA's Final Report on its evaluation of the EDD,²⁹

26. Guidelines, *op. cit.*, footnote 6, at 2.4.

27. As per the CRA Roundtable at the Canadian Tax Foundation's 62nd Annual Tax Conference (November 30, 2010).

28. IC, *op. cit.*, footnote 4, at para. 46; Guidelines, *op. cit.*, footnote 6, at 2.2.2.

29. CRA, *Enforcement and Disclosures Programs Evaluation - Final Report*

the CRA expressed the view that the mandate of the VDP (*i.e.*, to facilitate voluntary compliance with legislation administered by the CRA by processing voluntary disclosures made by, or on behalf of, non-compliant taxpayers) does not appear to have a clear linkage to the mandate of the EDD, which is to “deter, detect and correct, tax evasion and criminal non-compliance”. Specifically, the CRA noted that the VDP performs review processes focused on a taxpayer group that would normally be addressed by regular audit areas. The CRA recommended in its Final Report that it consider the appropriateness of the location of the VDP within the EDD. CRA management has agreed to consider the proper location of the VDP within the CRA in order to “maximize program delivery and to enhance the intelligence gathering capacity for Agency programs by September 30, 2011”.³⁰

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The VDP provides taxpayers with the opportunity to correct past tax deficiencies in a manner that will not automatically give rise to the application of potential penalties. While the advantages of making a disclosure under the VDP may be attractive, care must always be taken to ensure that a taxpayer’s circumstances do not preclude a valid voluntary disclosure that satisfies all of the necessary qualifications under the VDP from being made.

The foregoing provides only an overview and does not constitute legal advice. Readers are cautioned against making any decisions based on this material alone. Rather, specific legal advice should be obtained in the context of a reader’s own particular circumstances.

(October 2010), online: <<http://www.cra-arc.gc.ca/gncy/ntrnl/2011/nfrcmntdclsprgms2011-eng.html>>.

30. CRA, *Enforcement and Disclosures Programs Evaluation - Management Action Plan*, online: <<http://www.cra-arc.gc.ca/gncy/ntrnl/2011/ctnpln-eng.html>>.