

GST/HST Info Sheet

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Taxidermy - Animal, Bird and Fish Mounts

This info sheet explains how the goods and services tax/harmonized sales tax (GST/HST) applies to property and services provided by taxidermists.

In this info sheet, "taxable" means subject to GST/HST at the rate of 5% or 13%. "Zero-rated" means subject to GST/HST at 0%.

"Consumer" means an individual who purchases property or services for his/her own personal use or enjoyment, or for the personal use or enjoyment of another individual.

"Non-resident" means a person not resident in Canada and could be an individual, a business or an organization.

In this info sheet, "property" means tangible personal property.

Taxidermists use specialized skills, expertise, knowledge, and ability to provide a variety of products. Their products include life-size mounted animals in life-like poses, head and horn mounts, fish mounts or replicas, and rugs. Taxidermists also repair and restore these products.

Are taxidermists selling property or providing a service?

Sales of property and services are taxable when they are made in Canada. Sales to non-residents could be taxable or zero-rated depending, in part, on whether the taxidermist is providing a service or selling property. Therefore, before determining if what is being sold is taxable or zero-rated, taxidermists have to determine if they are providing a service or selling property.

Animal and bird mounts

Taxidermists usually process or work on property owned by someone else. If they mount an animal or a bird on a manikin using the animal's hide or bird's feathers, they are providing a taxidermy service. Materials such as a manikin, glass eyes, teeth, glue, paint, epoxy, bases, and habitat that the taxidermist uses while mounting the animal or bird are incidental to the taxidermy service.

Example 1

A hunter brings a bear hide to a taxidermist to have it mounted as a life-like animal. The hunter places the order and pays a deposit. The taxidermist cleans and tans the hide and creates a manikin on which the head and hide is mounted. Fibreglass and clays are used for shaping and glue for mounting. The mount is completed using accessory materials such as glass eyes, claws and teeth.

The taxidermist is providing a taxidermy service to the client. The accessory materials used in the course of providing the service are part of the taxidermy service.

Taxidermists are selling property if they sell mounts they own. This would be the case if, for example, they purchase an animal hide, mount it and sell the finished product. It would also be the case if they sell mounts they made for clients that forfeit their property because, for example, the client did not finish paying the taxidermist.

Example 2

A hunter pays a deposit to a taxidermist to have a deer head mounted. The taxidermist mounts the head but the client does not pay the balance owing. Under the terms of the agreement, the taxidermist acquires ownership of the mount and sells it. The taxidermist is selling property.

La version française du présent document est intitulée Taxidermie - Naturalisation des mammifères, des oiseaux et des poissons.





Fish replicas

When a taxidermist creates a replica from a picture of a fish using synthetic materials, the sale of the fish replica is a sale of property.

When a taxidermist uses very little of the fish, the final product is also considered to be a fish replica, and therefore the sale of the replica is a sale of property.

Example 3

A taxidermist creates a replica of a salmon based on pictures taken by an angler. The taxidermist constructs a mould, casts the body and fins in fibreglass, and creates the colouration on the mount. No fish parts are used. The sale of the fish replica is a sale of property.

Fish mounts

When a taxidermist uses several parts of a fish, including the skin, to create a fish mount, the taxidermist is usually providing a service.

Example 4

An angler brings a trout to a taxidermist to have it mounted. The taxidermist skins and degreases the fish, mounts it over a manikin, and attaches the fish head, skin and fins. To make the mount appear natural, the taxidermist paints each scale. As the taxidermist is using most of the fish parts, the taxidermist is providing a taxidermy service to the client.

As is the case for animal mounts, taxidermists are selling property if they sell fish mounts they own.

If you are not sure whether you are providing a service or property, you may ask for a written ruling or interpretation. See GST/HST Memorandum 1.4, *Excise and GST/HST Rulings and Interpretations Service*, for more information.

Sales to non-residents

Taxidermy services provided to non-residents

Services provided to non-residents are taxable when they are in respect of property situated in Canada at the time the service is performed. Consequently, taxidermists' services are taxable even when their clients are non-residents.

Example 5

A non-resident comes to Canada on a hunting trip and contracts with a Canadian taxidermist to have an animal mounted. After the taxidermy service is provided, the taxidermist ships the mount to the hunter outside Canada. The taxidermist's service to the

non-resident is taxable because the service is in respect of property situated in Canada at the time the service is provided.

Services on property temporarily imported into Canada

Services in respect of property can be zero-rated if both of the following conditions are met:

- property that is ordinarily situated outside Canada is temporarily imported into Canada for the sole purpose of having the service performed; and
- the property is exported as soon as possible after the service is performed.

Any parts or materials used in conjunction with the service are also zero-rated.

Example 6

A non-resident ships a damaged mounted bird from outside Canada to a taxidermist in Canada for repair. The taxidermist exports the mount immediately after the service is performed. The taxidermist's service is zero-rated because the mounted bird that is ordinarily situated outside Canada is temporarily imported into Canada for the sole purpose of having the service performed and is exported as soon as possible after the service is performed.

Sale of property to non-resident consumers

A sale of property to a non-resident consumer is zero-rated when a taxidermist:

- sends the property by mail or courier to an address outside Canada;
- ships the property outside Canada; or
- gives the property to a common carrier or a consignee that the consumer has hired to ship the property outside Canada. Trucking companies, railroads and airlines are examples of common carriers.

Example 7

A non-resident consumer comes to Canada on a fishing trip. The non-resident catches a fish that is photographed and released. The non-resident contracts with a Canadian taxidermist to have a replica made from the picture that was taken. The taxidermist creates the replica and ships it outside Canada. The sale is zero-rated because the replica is property and the taxidermist ships the property to the non-resident consumer at an address outside Canada.

If the non-resident consumer takes delivery of the property in Canada, the sale is taxable.

Other export rules

The export rules described above explain the most common situations. If these rules differ from your particular situation, see the following publications for more information:

- GST/HST Memorandum 4.5.2, *Exports Tangible Personal Property;* and
- GST/HST Memorandum 4.5.3, Exports Services and Intellectual Property.

Input tax credits (ITC)

Taxidermists may claim an ITC to recover the GST/HST they pay on their business purchases such as manikins, habitats and accessories. They can claim ITCs even if the property they sell or the service they provide is zero-rated.

This info sheet does not replace the law found in *the Excise Tax Act* (the Act) and its Regulations. It is provided for your reference. As it may not completely address your particular operation, you may wish to refer to the Act or appropriate regulation, or contact any CRA GST/HST Rulings Centre for additional information. These centres are listed in GST/HST Memorandum 1.2, *Canada Revenue Agency GST/HST Rulings Centres*. If you wish to make a technical enquiry on the GST/HST by telephone, please call the toll-free number 1-800-959-8287. A ruling should be requested for certainty in respect of any particular GST/HST matter.

If you are located in Quebec and wish to make a technical enquiry or request a ruling related to the GST/HST, please contact Revenu Québec by calling the toll-free number 1-800-567-4692.

All GST/HST publications are available on the CRA Web site at www.cra-arc.qc.ca/qsthsttech.