

## Publisher's Note

2019 — Release 2  
Previous release was 2019-1

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# Sanagan's Encyclopedia of Words & Phrases, Legal Maxims, Canada (5th Edition)

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Sanagan's Encyclopedia of Words & Phrases compiles entries consisting of a summary of judicial comments and/or relevant questions relating to the particular word or phrase.

This release features new and updated judicial interpretations to Words & Phrases in Volume 4 as found in recent case law.

### Highlights:

- **RENTAL ACCOMMODATION** — *Alberta* — By definition, rental accommodation, including apartments or rental homes, are considered public spaces under the [*Public Health Act*, R.S.A. 2000, c. P-37], and Alberta Health Services (AHS) does not require reasonable and probable grounds before entering to inspect them: *Alberta Health Services v. Wang* (2018), 2018 ABCA 339, 2018 CarswellAlta 2314 (Alta. C.A.) at para. 9 O'Ferrall, Crighton and Khullar JJ.A.
- **RESOURCE ACTIVITY** — *Federal* — The description of the activities ... in subparagraph [1206(1)](b)(i) [of the Income Tax Regulations], of the definition of

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“resource activity” is precise and detailed. A natural reading of the text of paragraph (g) of the definition of “resource activity” in this context suggests that the additional activities must be ancillary to or in support of the specific activities, that is, ancillary to or in support of the production or the processing, or the production and processing, of ore by the taxpayer. It is not sufficient that the activities be ancillary to or in support of a business that includes the specific activities as well as other activities—the additional activities must be ancillary to or in support of the specific activities: *Cameco Corporation v. The Queen* (2018), 2018 TCC 195, 2018 CarswellNat 5346 (T.C.C. [General Procedure]) at para. 872 Owen J.

- **RESPONSIBLE COMMUNICATION (DEFENCE) — Ontario** — ... identified the elements of the defence of responsible communication. That defence, as articulated in *Grant v. Torstar Corp.*, 2009 SCC 61, [2009] 3 S.C.R. 640 (S.C.C.), at para. 98, has two components. First, the subject matter of the publication must be a matter of public interest. Second, the publication must be “responsible”. In this context, “responsible” refers to both the steps taken to validate the accuracy of factual assertions in the publication and the overall fairness of the publication: *Armstrong v. Corus Entertainment Inc.* (2018), 2018 CarswellOnt 14125, 2018 ONCA 689 (Ont. C.A.) at para. 28 Doherty J.A. (Brown and Huscroft J.J.A. concurring).