

CARM System & Canadian Customs

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Canada – What is Happening? PM in Waiting

What is Your Systems ... 3 PM's in a Few Months ... Really?? What is happening in the 51st State?

Did he stay too long?



- PM in Waiting Pierre Poilievre
- Conservative Party of Canada







No need to know.



Trump Tariff Retaliation List – One Friend to Another

List or Lists

Rumor/Rumour Has It:

- Orange Juice Florida?
- Steel ?
- Plastics ?
- Toilets?



What Happened Before:

- Yogurt imports from Wisconsin and whiskey from Kentucky, the home states of top Republicans Paul Ryan and Mitch McConnell respectively, were hit with 10% duties in 2018.
- \$16.6 billion worth of steel, aluminum and hundreds of other products





Last Time – Canada Retaliated



https://www.canada.ca/en/department-finance/programs/international-trade-finance-policy/measures-steel-aluminum-businesses/countermeasures-response-unjustified-tariffs-canadian-steel-aluminum-products.html









LET'S KEEP TRADE MOVING

Protect **\$3.6 Billion** in daily Canada-U.S. trade that supports jobs on both sides of the border.

Businesses thrive on clear, stable policies to drive growth. Let's safeguard the \$3.6 billion in daily Canada-U.S. trade that supports jobs on both sides of the border.



Highlight states where Canada is the:





https://businessdatalab.ca/canada-u-s-trade-tracker/



CARM – Understanding Past, Present & Future





Been a Long Journey – Numerous Report Cards Along The Way – Inside and Outside of Government



https://www.youtube.com/watch?app=desktop&v=Mvx1O854J8s





CBSA's Books Were Not Balanced...

Issue #1: Importer Direct Payment Programs Misunderstood

G and I Program Importers that use multiple brokers can find it confusing to understand who and what to pay (particularly if using multiple brokers).

Importers had often:

- Overpaid their Statement of Account (SOA)
- · Paid the broker portion directly to the CBSA
- Paid all amounts to the broker

Impact:

- CBSA applies payments based on who made the payment (broker or importer)
- Multiple payments can lead to payment allocation errors if not paid correctly
- Excess credit on the account requiring disbursements





Multiple SOA's - CBSA's Books Did Not Balance...

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Broker SOA

Previous SOA Total Payable / Total à payer du RC	\$0.00
Payments since last SOA / Paiements depuis le dernier RC	\$0.00
Disbursement / Décaissement	\$0.00
Opening Balance / Solde d'ouverture	\$0.00
Current B3 Transactions / Transactions B3 courantes	\$0.00
Non-B3 Debt / Dettes non-B3	\$0.00
Available Credit / Crédit disponible	\$0.00
Interest Total / Total des intérêts	\$0.00
Total Payable / Montant total à payer	\$0.00
GST, Importer Direct / TPS, importateur direct	- 11 7- 11 7-
ast Period Transactions (Open) / Transactions des périodes précédentes (non soldées)	\$0.00
Current Period Transactions / Transactions de la période couran	2,565,435.23

Importer SOA

Statement of Account / Relevé de compte					
IMP SOA date / Date du RC	2020-02-25				
Payment due date / Date d'échéance du paiement	2020-03-02				
Previous SOA Total Payable / Total à payer du RC	1,754,543.01				
Payment since last SOA / Paiement depuis le dernier RC	(1,768,352.83)				
Disbursement / Décaisement	0.00				
Opening Balance / Solde d'ouverture	(13,809.82)				
Current B3 Transactions / Transactions B3 courantes	2,565,435.23				
Non-B3 Debt / Dettes non-B3	0.00				
Available Credit / Crédit disponible	0.00				
Interest Total / Total des intérêts	0.00				
Importer Total Payable / Total à payer par l'importateur	2,551,625.41				
Broker Total Payable / Total à payer par le courtier	0.00				
	IMP SOA date / Date du RC Payment due date / Date d'échéance du paiement Previous SOA Total Payable / Total à payer du RC Payment since last SOA / Paiement depuis le dernier RC Disbursement / Décaisement Opening Balance / Solde d'ouverture Current B3 Transactions / Transactions B3 courantes Non-B3 Debt / Dettes non-B3 Available Credit / Crédit disponible Interest Total / Total des intérêts Importer Total Payable / Total à payer par l'importateur				

The Importer should be paying this amount to the CBSA: \$2,551,625.41

Amounts Outstanding >180 Days

- > 2 Billion Dollars
- >10,000 Importers





April 2024 & Oct 2024 Was CBSA Ready To Launch?

Portal Registration:

- >1/2? currently registered (~120K)
- •>95% largest businesses

Portal 'Full' Delegation:

- Unknown (not known/shared by CBSA)
- UPS recently shared 20%

1% of Canada's import trade volume is ready (March 27 TCP CBSA)

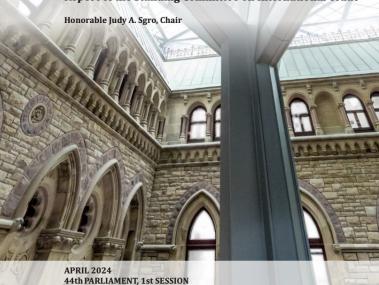
Status	Software Ready all in scope tests completed	>75% in scope tests completed	50%-75% in scope tests completed	<50% in scope tests completed	Testing In Progress (engaged and testing initiated but, experiencing connection or software issues)	Not Reporting
tware packages	3	3	8	4	7	2
ties and Taxes	3%	32%	36%	15%	9%	4%
saction Volume	1%	35%	29%	22%	10%	2%





THE CBSA ASSESSMENT AND **REVENUE MANAGEMENT SYSTEM:** AN INTERIM REPORT

Report of the Standing Committee on International Trade





Manage Revenue

Accounts Receivable
Management: The need for
modernized and integrated
revenue management systems is
well documented and
understood. The CBSA is investing
in modernizing its processes and
systems in order to ensure that it
can assess, collect and manage all
aspects of its revenue accounting,
eliminate manual reconciliation
between systems, and better
leverage available information.

Assessment/Re-Assessment: The CBSA will establish a common assessment/re-assessment engine that will automate the submission of trade information, better enabling consistent decision-making within the commercial and trade programs across the country.

Know Our Clients

Client Identification: In order for the CBSA to be able to modernize the way it interacts with its clients, the Agency will invest in the processes and systems required to properly identify, register and enroll clients in its various programs.

Client Management: Currently, the CBSA views its clients through individual transactions and does not have the ability to establish a holistic view. Investing in the capabilities required to manage individual commercial clients at a consolidated client account level is foundational for both improving internal operational effectiveness and client service delivery.

Support Trade Programs

Case Management: Improving the current information and document management practices will better allow the CBSA to manage and execute its trade compliance activities.

Risk Management: Improved risk management capabilities will better allow the CBSA to target its trade compliance work so as to focus on areas of high or unknown risk.



So, What Just Changed - Oct 2024

Pretty Much, Everything!

- Now CAD (B3 and B2's Gone).
- Requirement for Goods Released without Payment (RPP) for importer
- CBSA making the duties and taxes calculations
- Payment responsibility of IOR
- IOR has access to how CBSA sees them
- CBSA communicates directly w/IOR (via Portal)

Transitional Bridges - 90 days, 180 days, 1 year & beyond







CARM is not ACE Portal Registration is MANDATORY

CARM - Phase Launch Over 1 Year

- Accounting, Payment, Adjustments
- ∘100% IOR Registration Req'd by 5/2022 (October 2024)
- >>300,000 Importers (approx.?)
- <10% of Importers with posted Bond/Security</p>

ACE - Phase in Over 20 Years

- Release, Integration with PGA's, Accounting, Payment, Adjustments
- ∘400,000 Importers (approx)
- >>90% Importers have own Bond/Security
- •48,000 Importers on ACH (direct payment)





Government Programs/Capabilities	Canada	USA
Trusted Trader Programs • Normally Non-Regulated Goods	CSA	CTPAT Trac
Release Electronic Pre-Screening of Commercial Goods • Transitioning from ACI (Advanced Commercial Info) to SW (Single Window)	ACI/SW	ACI/SW using ACE
Accounting Trade Report Accessibility to Importer	FIRM – Request CARM 2024	ACE
Self Payment Options	ARL Now CARM	ACH
MKMARIN	G	14



Shared Benefits & Vision....

	PreCARM	PostCARM
	Manual paper-based processes (e.g. B2 adjustments, recourse)	Automated processes (electronic submission of data)
,	Complex trade information requirements	Better tools to promote trade compliance
	Clients have limited access to account information	Clients have ready access to current account information
9511	Inconsistent application of rules and policies (e.g. permits, documentation)	Centralized, consistent application of rules and policies
	Manual data-entry processes that increase error rates and require after-the-fact follow-up	Automated, real-time data validation
	Managing every transaction	Managing clients holistically
	Client information retained locally	National access to all client information
	Non-integrated, customized and unsupported IT systems	Modern, integrated systems based on industry standards
	Opportunities for revenue loss	Tighter controls to prevent revenue loss





Transitional Challenges (Things to Know)

CBSA Records

CBSA's Records May Appear Unbalanced – Require Reconciliation – Importer's Need to Look/Ask

Review SOA for any surprises?
 Help Desk/ Tickets = Helpful

Delegation

Incomplete Delegation has resulted in Releasing Broker (particularly couriers) being 'Unable' to Account to Importer BN and 'making transitional choice'

- Contact BAM (if they can find) and become delegated (before accounting)
- Leave Requirement to Account Pending (importer's obligation/liability)
- Account using Broker BN importer loses traceability

Bonds

180 Days of Grace ends April 19, 2025



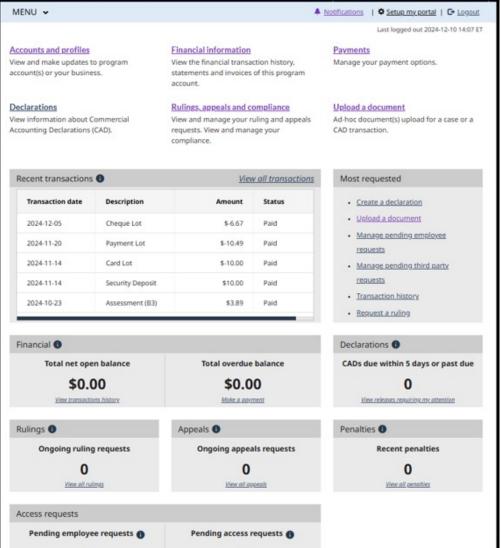


CARM Client Portal Business Account View

portal 'supposed to' bring together all account information



View all employee requests

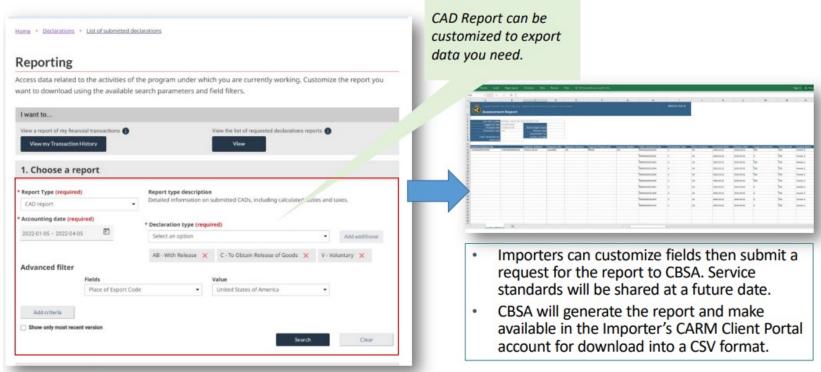


View all access requests



Importer Self-Serve - Reports & Adjustments

CAD Reports will be Available in Downloadable Format



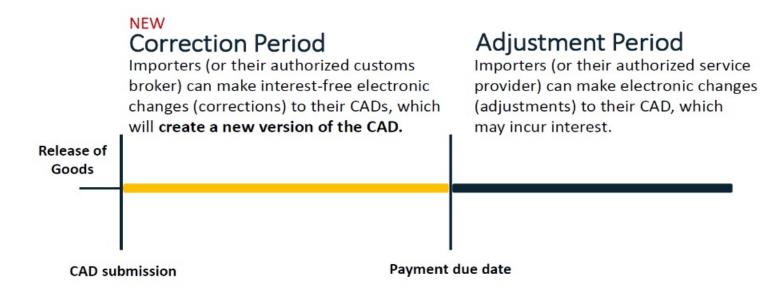




Timeframe



At Release 3, changes to a CAD can be made before and after the payment due date





Awareness of Adjustment Journey

Single Entries in the CARM Transitional Challenge

Entries from the Pre-CARM environment are not automatically imported into the CARM environment

They must be manually imported by the broker or importer as a CAD before an adjustment can be complete

Additional fields may be required when manually pulling the data into the CARM environment

Entries can require an adjustment going back 4-years; therefore, this transition period will be in place for 4-years from the date CARM Release 3 (R3) goes live





Payment Process - New Options

Objective

Automate and improve?? the payment process by offering additional electronic payment methods

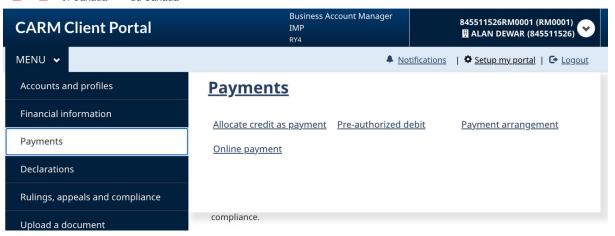
Payment Methods

At Point of Entry:

Credit or debit card (<\$5,000)

Electronic payments:

- Online banking*
- New: Credit via the CARM portal (<\$5,000)
- EDI**
- New: Pre-authoriz Government of Canada du Canada







Transition

RPP Security

Needs to be in place by April 2025

For many the last step (likely go to options):

- Cash
- Bond







RPP BONDS

RPP

RPP security will be set at 50% of the highest monthly AR

Surety Bonds have minimum floor of \$5K and the current \$10M cap remains

There will be a minimum bond of \$5k

- Smaller importers can post a cash bond in the amount of their highest AR. This can be done by making a payment through the CCP.
- This secures 211,000 smaller importers at 100% of their highest monthly AR with minimal financial implications to importers.

Larger importers will be required to secure 50% of their highest monthly AR

- Applies a consistent percentage reduction to all importers.
- Offers a simple mechanism to reduce the financial impact to importers.
- Improves CBSA security coverage.

Important:

- Maintains the existing cap of \$10M.
- Treats new and existing importers the same.
- Offers a simple model with significant cost relief to importers, while still covering significantly more CBSA accounts receivable than the current state.

Importers no longer able to use Broker Account Security – or Import Bond.



Surety Association Showcased Bond Thoughts

Cash OR Bond – 80/20 Rule

•> \$10K = Bond •>\$5K = Depends •<\$5K = Use Cash

Cash Security		RPP Bond		
Amount	Cost (@ 3.45%)	Amount	Cost* (@ 0.5%)	
10,000	345	25,000	400	
15,000	518	25,000	400	
20,000	690	25,000	400	
25,000	863	25,000	400	
50,000	1,725	50,000	400	
100,000	3,450	100,000	500	
150,000	5,175	150,000	750	

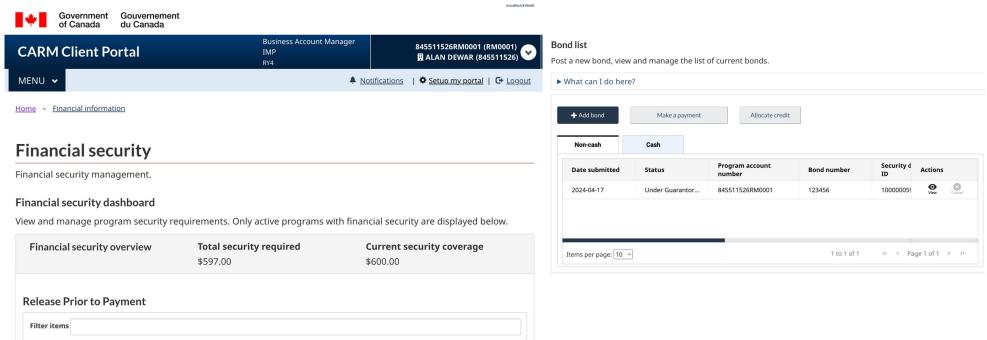
*Note: Chart assumes minimum RPP bond premium is \$400. The cost of an RPP bond s typically 0.4% to 1.0% of the bond amount. Administration fees may also apply. Price of an RPP bond is determined by each Surety and may vary from importer to importer.

Table Source: SAC - Surety Association of Canada





Customs Bond (Portal Visual)



Update requirement 1

utilization

481.4 %



Program account

845511526RM0001

Program

Importer

Calculated security

requirement

\$597.00

Security

posted

\$600.00



Customs Bond (Portal Visual)



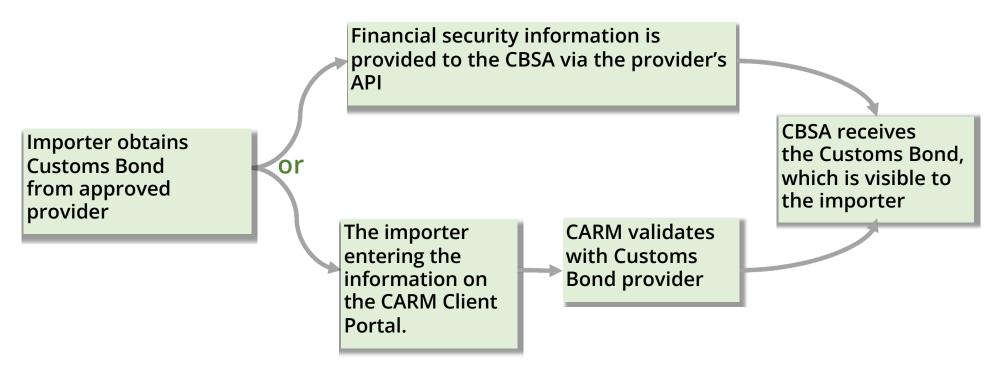
*	Government of Canada	Gouvernement du Canada		
CARN	/ Client Po	ortal	Business Account Manager IMP RY4	845511526RM0001 (RM0001) 贝 ALAN DEWAR (845511526)
MENU •	~		♣ No	tifications 🌣 Setup my portal 🕒 Logout

Post non-cash bond

Surety company		
* Surety Provider (required)		
Select from list	•	
Bond details		
Bond category		
Electronic Bond		
* Bond number (required)		
t CDSA nava nava (na maina d)		
* CBSA program (required)		
Importer ▼		
* Program account number (required)		
845511526RM0001 ▼		
* Bond amount (required)		
\$		
1 RPP calculated security require	ement and RPP utilization	
	on-cash bond shall be at least 50% of the requirement calculated by the CBSA	
(i.e. one dollar of the non-cash bond wi	ill cover two dollars of debt).	
* Is it a Release Prior to Payment (RPP) b	oond? (required)	
O Yes	(calanaa)	
O No		
* Legislative authority (required)		
Select from list	•	
Validity period		
	* To (required)	
* From (required)	" To (required)	



Customs Bond (Electronic) - Workflow







CARM 3 Challenges

Inability to Query BN#

Limited validation of BN# details during filing process

 Multiple bonds of the same type can be filed under same BN#

Financial providers and brokers cannot see bonds filed or terminated under BN#'s, which limits their ability to assist importers.

Only importers have visibility of activity under their BN#

- Only importer can see all active/terminated bonds under BN#
- Financial providers cannot see entry details for import bonds under their account
- Brokers and financial providers will not be notified of "nudges". It is importer responsibility to notify/consult with their security agreement provider.





Things to Consider - Checklist



Assume possibility of future disruption/challenges.



Verify DDP or as NRI are of CARM and registered in the portal – and not on your IOR Statement.



How are payments happening to CBSA post October 21, 2024 (particularly if multiple brokers involved). Clear communication with Customs Broker(s) to ensure you are on the same page – no Late Penalties

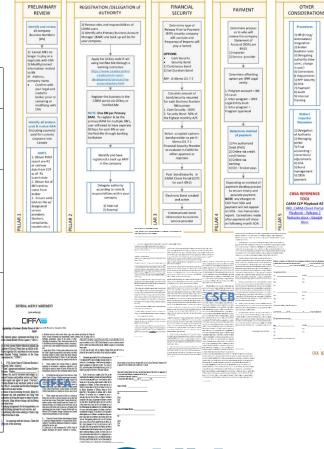


Customs Brokers may be requesting now POA (Power of Attorney) or GAA(General Agency Agreement) with revised STC's (Standard Trading Conditions) – particularly to meet Surety Bond requirements



Make sure delegation of authority has been granted to Customs Broker and other relevant service providers.







Report Card at January 1, 2025

INCOMPLETE

We have been reporting issues with Help Desk calls that are being dropped, taking too long to answer or not being answered at all. The CBSA has advised that they have made changes to the infrastructure itself which allows an increased canacity as well as sed staff taking the calls. Members should begin to see an improvement in this service in the upcoming few days. Please reach out to the cscb@cscb.ca to let us know if you see an improvemen

update on a ticket they can use the reply received from the CBSA Help Desk; as long as they keep the subject line the same they can use that email thread for follow up questions on the ticket rather than issuing a new one to request an update

It has been reported that email notifications that were previously received are no longer being received. We have escalated this

The CBSA started sending nudges for RPP financial security.

Members are concerned that the CBSA will issue notification in the CPP regarding late or incomplete October payments. The CBSA has been asked if importers will receive notifications in the CARM Client Portal for late or incomplete October payments Here is the reply: "The messages for non-payment/partial payment are part of the Pre-Collection module. During the 90 days period following the cutover, there will be no notifications sent by CARM. After this period, the TCPs will start receiving Precollection notifications and penalties will be applied automatically to overdue accounts.

Some Broker's EDI payments for an importer SOA have not been applied in the importer's CARM account and now showing as

Some Broker's individual cheque payments, for specific BN15s, were applied to the Broker account instead of the importer's

Entries sent pre CARM (B3) are accepted, however, not showing up in the Client's portal for viewing or payment. CBSA is looking

It has been reported that CADs have been accepted and the CAD has disappeared from the CCP.

CAD responses do not annear to be following the SOA months indicated in CN24-29.

The CBSA has been asked to confirm if an NRI applying for Carrier Code Registration needs a BN9 prior to registration. The CBSA has advised that all portal registrations require a BN9 however they are working through challenges that NRI carriers may be a substantial portal registration of the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations are under the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations are under the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations and the substantial portal registrations are under the substantial portal registrations and the substantial registrations are under the substantial registrations are u

Members are reporting delays in systems responses when a CAD has been submitted. The CBSA is aware and investigating.

It has been reported that CADs are being acknowledged but the CAD is not been returned. When the customs broker attempts to resubmit the CAD, it is being rejected for the wrong version number

It has been reported that due to the solit of import/export numbers, transactions submitted with the correct importer RM number are being rejected for DOA when BAM DOA is on file.

There are a high number of tickets to the help desk that are related to questions and issues on HS code. Tariff and Excise and GST Exemptions that their EDI/API client support representatives are not equipped to resolve. To better serve the clients the CBSA is now asking that emails be sent to the CBSA area able to address your questions, therefore you are being asked to message Excise_Taxes_Accise@cbsa-asfc,gc.ca

There is an inconsistency with GIP20 transactions. Some are being accepted and some are being rejected using the same data on a different transactions.

It has been reported that GST code 50 has been removed from the tables covered by D8-2-10. GST Code 50 was replaced by Code

The CBSA has been asked if the usage of a customs broker BN with temporary bond can be used for CBSA Recognized Trade shows and unrecognized shows equally. We will advise when an answer is received. CBSA has confirmed that this applies to both recognized Trade Shows and equally to other Trade Shows.

If your clients are having problems accessing the CCP and there is not a reported outage ask them to

Importer SOAs are incomplete and not accurate. In some cases DN's from September 26th have not been applied. It is a known problem: In addition, the CBSA has advised that September payments have not all been applied. There are credits and debits flowing through the system and it may also more time for the financials to be up to date. The CBSA will be flexible with incomplete payments and will not be charging interest or prenalties on late payments for 90 days as per Customs Notice 24-29.

sion Permit to the bond. CBSA is looking into this to see if they have all been moved over as this may have been manual process. They will advise

mnorary Admission Permit in 'created status' in the CPP cannot be edited.

here is an issue with the Temporary Admission Bond. The transaction number field is not big enough and the EDIT butto onger there. The CBSA is looking into this. We have asked what the solution is if the fields cannot accommodate the tran mather or document number? Can a paper BSF be submitted? We will advise when an answer is forthcoming. We have ac he CBSA that this requires urgent resolution.

PREVIOUSLY REPORTED CONCERNS (UNRESOLVED) - Listed alph

Service standards for adjustments are still 90 days as per the following CBSA publications: https://www.cbsa-asfc.gc.ca/services/serving-servir/standards-normes-2024-2025-eng.html# https://www.cbsa-asfc.gc.ca/publications/dm-md/d17/d17-2-1-eng.html @

The following annex codes are not working as expected: 9903, 9948, 9958, 9959, 9960, 9961, 996

Members report rejects for CADs with annex code 9993 noting "Time limit To field is invalid" becau: isn't matching with CBSA CARM system.

The CBSA has been asked to confirm what RM number a customs broker should use for confirming their entries when submitting a CAD using the customs broker's BN. CBSA advised it is the decision of your business depending on your business structures.

It has been reported that CADs submitted with one line are being returned from the CBSA with multiple lines and with inflated payables. This has been escalated. If you encounter these issues please submit a Help Desk Ticket and advise the cscb@cscb.ca

TCCU bulletin that CADs over 100 lines cannot be submitted. Update: The issue was temporarily resolved by increasing CAD submission limits to 250 lines as of yesterday, Thursday, November 7, 2024. A permanent solution to increase the CAD on submission limit to 1000 lines is currently underway.

Members are seeing the following CAD rejects:

Error Code 158 – Function code incorrect or Transaction already submitted at Level DocumentMetaData/Declaration

Members are reporting the CAD reject with the message "Release Not Found". CBSA has advised that this is happening after a CARM portal outage and CBSA will resend the transaction data. Please do not resend these transactions as it will cause duplicate

code - Invalid Client Privilege Code). This is due lack of We have been made aware of CAD rejects for French characters being used, this has been escalated.

As outlined in the D17-2-3, grequests to withdraw a CAD must only be made in instances where information on the CAD is ded using the correction or adjustment processes in CARM. This includes errors in

b) information declared on a Pre-CARM "As Declared" CAD; and,

c) the transaction number, where a TCP submitted a CAD using a transaction number that belongs to another TCP, whom they

Please refer the <u>D17-2-1</u> @which speaks to the process of submitting an adjustment, the supporting documentation

CIVS

actively working through the testing process to ensure everything is accurate and validated. Once the files are finalized the backdated to align with the original dates they were accounted for.

Brokers are seeing rejects on CADs for existing clients who have approved their DOA as of today. Previous CADs for these clients

It has been reported that customs brokers are unable to transmit adjustments for pre-CARM transactions for importers fo which they have BAM delegation of authority. In these particular cases the cus some information but they were unable to "Review & Submit".

NEW ITEMS

- CBSA has confirmed a CARM defect that does not allow the use of GIP20 (and possibly GIP100 as well) with HS 1101.00.10.00. There is no ETA on the fix yet.
- · Members have advised that their clients are receiving notifications / nudges from the CBSA CARM portal stating that RPP will be revoked during the RPP Transition period if payment is not made or security amounts increased. Importers should $ignore\ these\ notifications\ if\ their\ RPP\ flag\ is\ Y\ however\ the\ CSCB\ has\ asked\ the\ CBSA\ again\ if\ these\ nudges\ /\ notifications$ could be paused during the Transition period.
- V-types and broker's own transaction number we asked brokers to advise us if they are unable to use their own TN to create a Voluntary entry in the CCP. We have been told this continues to be an issue and we have escalated to the CBSA.
- · We are working on .00 amounts that are not on the DN, as designed, however not showing in the statistical transactions
- The CBSA will be holding a French CARM webinar for carriers and freight forwarders in January. Once the date has been determined it will be added to their webinar website, please click here to register:

https://www.cbsa-asfc.gc.ca/services/carm-gcra/webinars-webinaires-eng.html

The CARM Client Portal will not be available on the following date to implement product fixes:

Friday, December 20, 2024 9pm to 3am EST December 21, 2024.

Duty Relief Licenses

We have been made aware of CADs being rejected when using OIC numbers in the CCP for Duties Relief Licenses. A help desk

CADs are being rejected asking for an excise code on engine parts classified under HS #8409.91.00.90. This HS number can wors are configurate asking for an excess covering in earlier parts as some union in 300-005. This is a family over air conditioners for webicles, if the air conditioner was specifically for the engine, separate from an air conditioner that air onditions the inside of the car for the passengers. Specific parts may have excise codes. We are seeking additional information

Alcohol shipments with excise tax code E10, E11 and E12 are being rejected

HS codes starting with 2712 and 8409 are being rejected for excise tax code but they're not on the list of applicable HS codes

The CBSA Policy Team continues to review all emails that are being sent to the Excise Tax mailbox with regard to the various HS Classification/Tariff Code/GST code combination rejects and are working on a bulletin to be shared with trade. They are sending out responses to trade chain partners that usually fall into one of the following buckets:

(2) The table has been rectified and the codes will be undated at which time CADs can be resubmitted

(3) They have determined that the codes are not eligible (A) The codes are in review with our experts

When a GC Key has expired and a new one is applied for, there are issues with linking the new key to the existing CCP accounterer are two BAMs, the BAM with the expired GC Key would create a new key and request access to the employee at which the other BAM would approve the requestor. If there was only one BAM, and that is the BAM with the new key, they would to open a Help Desk Ticket and do a BAM switch to a new key



RESOLVED CONCERNS - Listed alphabetically

Annex codes: 9908, 9963, 9968, 9982, 9993 and 9958 are not working. (for specific HS of

CBSA has advised that goods under 6813.20.11.00 are not eligible for Tariff Code 9963.

Statements of Account for par

Past, Present, & Future

Past

(2010) Budget - No RPP

(2015) RPP Needed Low Bad Debts to CBSA \$100's of Thousands

(2016) ARL – Option for IOR to Pay GST direct

(2017 & 2020) COVID Higher Bad Debts to CBSA \$100's of Millions

(2024) Bad Debts / Uncollected

- >.\$2 Billion
- >10,000 loR's

Present

CARM In – Accounting System (No Release) No Turning Back CIIT seeking Auditor General Review Portal Stability questionable

Transitional Challenges

- 90 day penalty free
- 180 day no security (Surety API's evolving)
- Notification Nuisance
- Security Not Relevant until April 2025
- Multiple RM's (Multi-Portal?)

CBSA Help Desk **Busv**

- Staff has more than doubled (& working OT)
- Reportedly excellent service (when connected)

CBSA Celebrating...

- ->4 million CAD's
- -5.4 Billion Duty Calculated (\$2.4B Collected?)

Challenges

- Calculation & Coding (& now some GST relief..2 months)
- Release 9,999 Lines and Acct 999 lines (TCC24-109)
- Broker/Courier THE GREAT DELEGATION GAP

Future

Rebuilding Relationships

- Association lobbied on known challenges
- · CBSA forged ahead
- CIIT Political involvement
- · OAG?

How > 2 Billion Uncollected Bridged

CARM a non-tariff trade barrier Brokers not facilitate certain shipments Transitional Adjustment PreCARM entries – 4 yr window

Extension(s) to Transitional plans ???

- Bond rush (qualification)
- Calculation concerns
- · No Delegation / Use of Broker BN

Portal functionality enhancements

- Reporting delay? why not download
- Release triggers liability (whether or not delegation exists)
- Deputize Delegated Parties Re BAM??
- Transparency Active IOR/Security?



What happens after CARM Finally in Play.....











Verification Priorities for January 2025

Verification Target List

Updated every 6 months

Access List and Details:

https://www.cbsaasfc.gc.ca/import/verification/menueng.html





Tariff Classification

- Gloves) Round 3

- Gloves) Round 3
 Bags Round 3 (42.02)
 Spent fowl Round 3 (02.07, 16.01 and 16.02)
 Freezers and other freezing equipment (84.18)
 Washers and dryers (84.50 and 84.51)
 LED lamps Round 2 (85.39)
 Furniture for non-domestic purposes Round 4 (94.01 and 94.03)
 Parts of lamps Round 4 (94.05)
 Cell phone cases Round 3 (39.26, 42.02 and 85.17)
 Parts of machines and mechanical appliances (84.79)
 Bicycle parts Round 3 (87.14)
 Parts for Use with Machinery of Chapter 84 Round 3 (84.31)
 Indicator panels and light-emitting diodes (LED) (85.31 and 85.41)
 Safety headgear Round 5 (6506.10)
 Disposable and protective gloves Round 5 (3926.20 and 4015.19)

Valuation

Apparel Round 4 (Chapters 61 and 62)

Origin

- Bedding and drapery Round 3 (63.01, 63.02 and 63.03) Round 3
 Russia/Belarus content (for MFN eligibility) products of iron or steel | fertilizer | petroleum | non-ferrous metals | tires



Verification Priorities for January 2025

Verification Target List *Updated every 6 months*

Access List and Details:

https://www.cbsaasfc.gc.ca/import/verification/menueng.html





- Tariff rate quota and classification of supply managed goods
- Verifications on the classification of frozen desserts containing 5% of dairy products
- Tariff classification of gloves
 - Third round of verifications on gloves classified under headings 39.26 and 42.03
- GST and excise duties and taxes
 - GST exemption codes
- Vaping products subject to excise duties and taxes
- Import origin verifications under:
 - Canada-European Union Comprehensive Economic and Trade Agreement (CETA)
 - Canada-United Kingdom Trade Continuity Agreement (CUKTCA)
- Duties Relief Program (DRP)
 - Verifications of licensees importing supply managed goods
- Most-Favoured-Nation (MFN) tariff treatment withdrawn from Russia and Belarus
- China Surtax Order (2024): Electric vehicles
- China Surtax Order (2024): Steel and Aluminum



How CBSA May Let You Know There Could be a Problem – Very Important!





Like a CF28 or CF29

Each tool (letter or notice) requires a certain level of CBSA intervention, as described here:

Trade advisory notice (TAN)

 This is a letter to the importer asking them to review a declaration when there is a potential for non-compliance. It includes guidance resources to help the importing community comply. No monetary assessment follows as a result of a trade advisory notice.

Compliance validation letter (CVL)

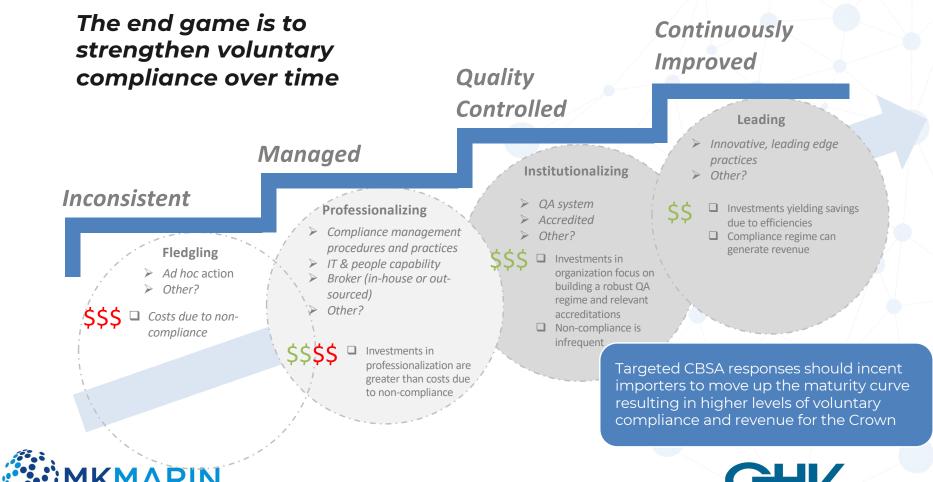
 This is a letter to the importer asking for more information when the CBSA suspects an instance of non-compliance. Importers must send information to the CBSA within 30 days. Monetary assessment might follow as a result of a compliance validation letter.

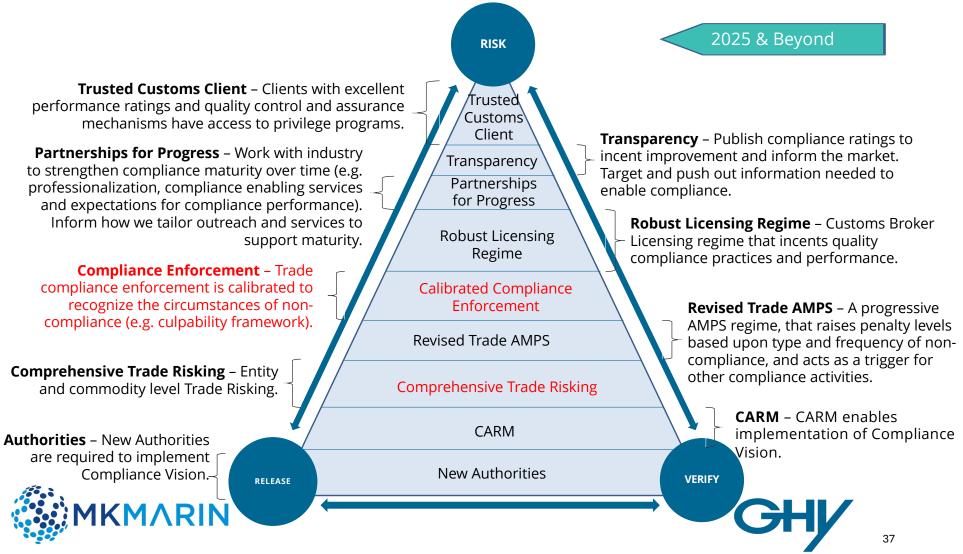
Directed compliance letter (DCL)

• This is a letter to the importer accompanied by a monetary assessment. It addresses instances of known non-compliance.

As with trade compliance verifications, recourse provisions of the *Customs Act* apply to any resulting assessments.







Rapid Fire





Federal Plastics Registry – Phase 1 Reporting Guide

Supporting Canada's Zero Plastic Waste Agenda

- Mandatory reporting system under CEPA (Canadian Environmental Protection Act).
- Tracks lifecycle of plastics to prevent pollution and support zero plastic waste goals.
- Provides standardized data on plastic production, use, and end-of-life management.
- Residential waste streams.
- Reporting Deadline**: September 29, 2025 (for 2024 data).







Federal Plastics Registry – Phase 1 Reporting Guide

Who Has To Report?

The proposed federal producer definition is outlined as follows:

- an obligated producer is defined as a brand owner or intellectual property (IP) holder that resides in a province or territory.
- if the brand owner is not a resident of a province or territory, then the first person to manufacture/ import and/or distribute a product in a province is defined as the obligated producer.
- if there is no resident importer or distributor, then an obligated producer is the retailer that places plastic products on the market in a province or territory.

The federal producer definition would also allow a company to voluntarily assume the reporting obligations of others. For example, a national brand owner may wish to report on their products in place of local distributors or retailers.

Example of how a federal producer definition should apply.

If a grocer carries their own brand of pasta in plastic packaging, that grocer would be defined as the producer. If the grocer carries a brand of pasta bought from a distributor in Canada, that distributor would be defined as the producer. If a grocer carries a brand of pasta imported directly by the grocer from Italy, that grocer would be defined as the producer.







Federal Plastics Registry – Phase 1 Reporting Guide

Contact Info – Key Resources – Federal Plastics Registry – Environment and Climate Change Canada

- Mandatory reporting system under CEPA (Canadian Environmental Protection Act).
- Tracks lifecycle of plastics to prevent pollution and support zero plastic waste goals.
- Provides standardized data on plastic production, use, and end-of-life management.
- Federal Plastics Registry https://www.canada.ca/en/environment-climate-change/services/managing-reducing-waste/reduce-plastic-waste/initiative-regulation/federal-plastics-registry.html
- Email: RFP-FPR@ec.gc.ca







Forced Labour/Labor Update - Due May 31st

Fighting Against Forced Labour and Child Labour in Supply Chains Act



BUILDING A **SAFE** AND **RESILIENT CANAD**

- The Fighting Against Forced Labour and Child Labour in Supply Chains Act (Supply Chains Act):
 - Transparency legislation
 - Came into force on January 1, 2024
 - First reporting deadline: May 31, 2024
- Requires certain entities and government institutions to submit a report to the Minister of Public Safety by May 31 of each year
- Reports must describe the steps taken, if any, to prevent and reduce the risk that forced labour or child labour was used in their supply chains
- Government institutions must report on what they are doing to address risks, but are not obligated to take responsive actions
- Public Safety Canada is working to increase awareness of the reporting requirements to increase compliance and improve reporting information



Public Safet

Sécurité publique Canada

2 Unclassified | Non classifié





Forced Labour/Labor Update

Findings of the 2024 reporting cycle



BUILDING A SAFE AND RESILIENT CANADA

- Public Safety Canada received 5,795 report submissions by the May 31, 2024, deadline
- 145 Government institutions reported
 - 53 of these represented Crown corporations

Measures taken to prevent and reduce risks of forced labour or child labour (Government Institutions' To	op 5)
Conducting an internal assessment of risks in the organization's activities and supply chains	25%
Developing and implementing labour contractual clauses	23%
Developing and implementing labour standards, codes of conduct and/or compliance checklists	16%
Developing and implementing due diligence policies and processes	16%
Mapping supply chains	12%

Government institutions which have taken me to remediate instances of forced labour or labour	
Actions to prevent forced labour harms from reoccurring	1%
Grievance mechanisms	2%
Other	2%
Compensation for victims	0%
Actions to support victims	1%
Formal Apologies	1%

Public Safety Sécurité publique

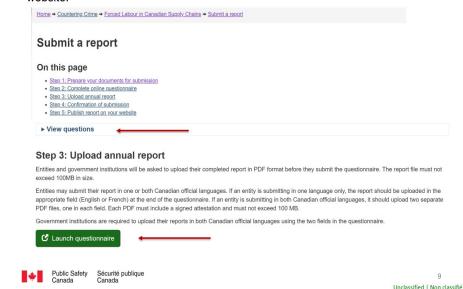
Unclassified | Non classifié

Reporting process – questionnaire and submission



RUILDING A SAFE AND RESILIENT CANAD

 The link to complete the questionnaire is available on the Public Safety Canada website:







SIMA – Changes In Effect

- Anti-circumvention Investigations
- Scope Proceedings
- Addressing Price Distortions
- Union Participation
- Retroactive SIMA
- New SIMA Handbook January 3, 2024
- Make Sure Watching Cases
- Exporter IDs are mandatory with CARM
- SIMA Bonds
 - https://cbsa-asfc.gc.ca/sima-lmsi/menu-eng.html









SIMA (Special Import Measures Act) – Cases

- Many expiry reviews, re-investigations, normal value reviews, expedited reviews
- Enforcement statistics: https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/mif-mev-stats-eng.html
- Measures in force: https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/menu-eng.html
- Normal Value Reviews with No Notice Market Watch





Measures in Force - SIMA

Measures in force

This is a list of goods currently subject to anti-dumping or countervailing measures pursuant to the *Special Import Measures Act* (SIMA). It is updated as necessary to reflect the current status of duty liability.

Note If there is any discrepancy between the SIMA finding or order and the information in this Measures in force list, the finding or order takes precedence.

This table can be filtered by case, country, or tariff classification numbers.

Related links

Filter items	Showing 1 to 53 of 53 entries	
Case ↑↓		Case type
Wire rod (WR)		Dumping: China, Egypt and Vietnam
Wind towers (WT)		Dumping and subsidy: China
Whole potatoes (POT)		Dumping: United States
Wheat gluten (WG)		Dumping: Australia, Austria, Belgium, France, Germany and Lithuania





Thank You!!!

Name: Kim Campbell Name: Alan Dewar

Company: mkmarin trade services inc. Company: GHY International

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Phone: 1-888-312-6556 ex 111 Phone: 1-240-470-9591

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