Trade Chain Partner Working Group (TCP WG) Consultation

September 19, 2018





Purpose

• Today's meeting is intended to share early thinking emerging from the CARM Project. The purpose of the meeting is to provide a forum for consultation with the Trade Chain Partner community.



Today's agenda

Торіс	Content	Timing
Introduction	Objectives and expectationsOverview of discussion topics	
Advance Rulings & National Customs Rulings	• Discussion of notential implications	
Appeals	 Potential future state Discussion of potential implications Conceptual system solution 	
Publishing of Tariff Calculation Rules and Validation Files	• Discussion of notential implications	
Deployment	Considerations for deployment approach	
Lunch		12:00 – 12:30pm
Billing Cycle Walkthrough	 Overview Illustrative scenario(s) to demonstrate the potential future state billing cycle 	12:30 – 3:50pm
Wrap Up		3:50 – 4:00pm



Objectives and expectations

Guiding principles

- Think from a future state perspective
- Focus on the norm, rather than the exceptions
- Challenge perceived constraints
- Park questions and issues that cannot be resolved today

Expectations

- Be open to new ideas
- Actively participate
- Be output oriented feedback from this consultation could be considered in the solution design for CARM

Advance Rulings & NCRs

2 Appeals

Tariff Calculation
Rules &
Validation Files

4 Deployment

5 Billing Cycle Walkthrough



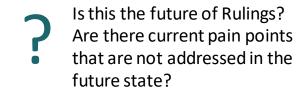
Manage Advance Rulings and National Customs Rulings (NCRs)

- Potential future state
- Discussion of potential implications
- Conceptual system solution



Potential future state for automated rulings









Potential future state for automated rulings

Objectives

- **1. Electronic submission** of rulings request by TCPs
- 2. Potential to **publish** all rulings **publicly**
- 3. Single Database for managing all Advance Ruling and NCR decisions and documentation

Advantages

- Removes time allowances for mail
- Case management functionality enabled by CARM could support assigning and conducting cases
- ✓ CARM will enable easier access to rulings

Considerations

- ✓ The system may not capture the criteria (e.g. capabilities, availability) required for assignment
- Privacy concerns for public Advance
 Rulings publishing
- ✓ Slower timelines for publishing rulings
- May discourage TCPs from requesting a ruling

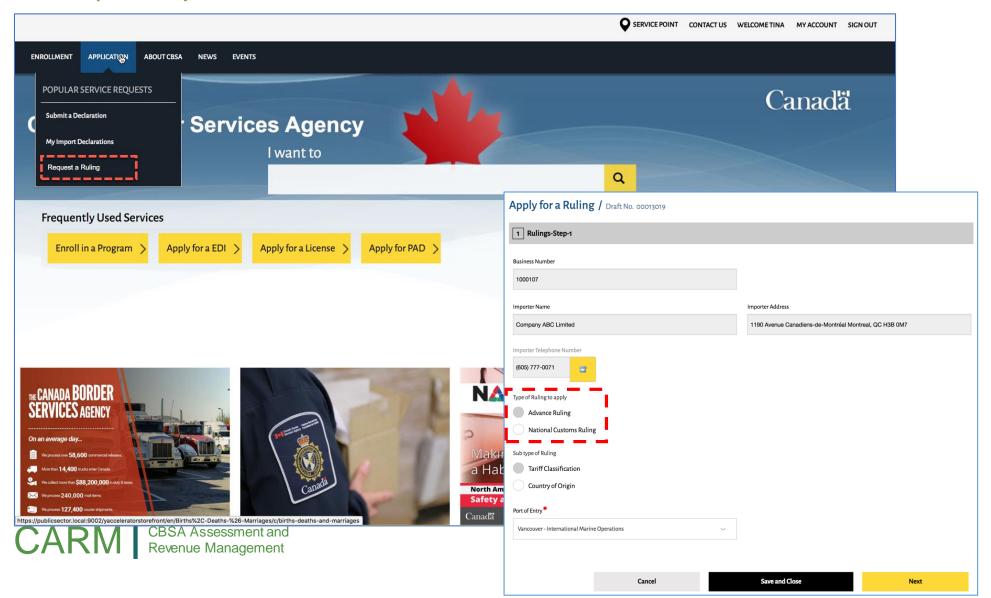


Discussion of potential implications

	Potential Implications	Discussion	
01	Online self-serve portal to request and manage rulings	Are there challenges associated with shifting towards an electronic submission process?	ا ا
02	Harmonized process to manage Advance Rulings and National Customs Rulings	Are there any foreseeable downsides to a	<u>ි</u>
03	Single electronic database for managing all Advance Ruling and National Customs Ruling decisions and documentation	harmonized process?	0
04	Potential publication of all Advance Ruling decisions	What are the implications of publishing Advance Rulings publicly? Would it deter TCPs from requesting a ruling?	िः



Conceptual system solution



Manage Appeals

- Potential future state
- Discussion of potential implications
- Conceptual system solution



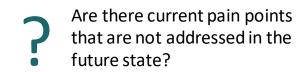
Potential future state

Submit request for appeal for appeal and execute case with CITT / Federal / Supreme Court

With CITT / Federal / Supreme Court

Frioritize, distribute, and execute case decision

Accept final decision



File Notice of Appeal





Potential future state

Objectives

- **1. Electronic submission** of appeals by TCPs
- **2.** Automatic validation of appeal submissions
- 3. Feedback loop to inform parties of process outcomes

Advantages

- Efficient prioritization and distribution of cases
- ✓ Greater ability to share and access information, resulting in more accurate and consistent appeal decisions

Considerations

- ✓ Trade and Enforcement appeals may not align
- ✓ The system may not capture the criteria (e.g. capabilities, availability) required for assignment
- ✓ The system may not know the true case load of an officer for effective prioritization and assignment due to the exclusion of traveller cases

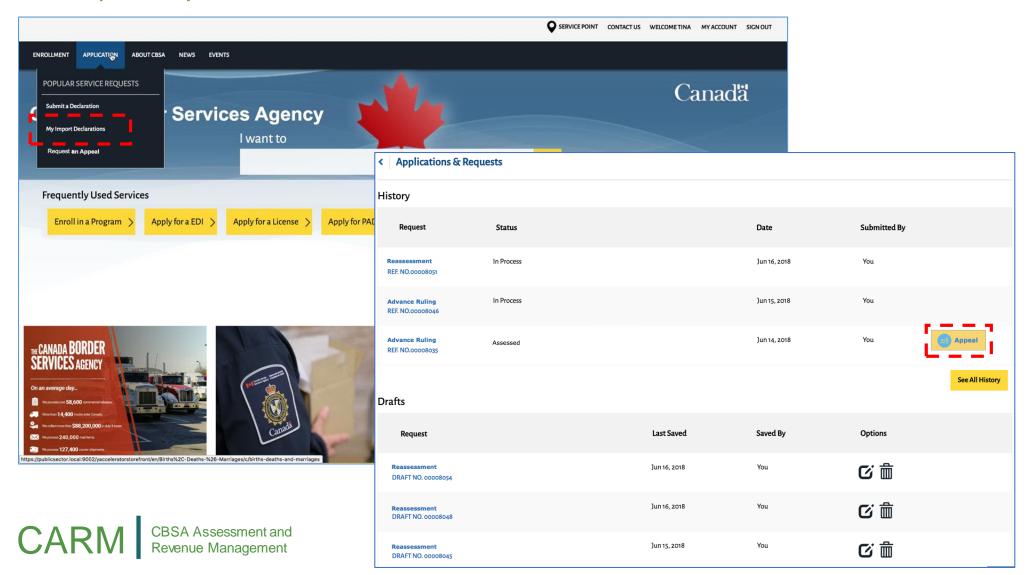


Discussion of potential implications

	Potential Implications	Discussion	
01	Electronic appeal (trade, enforcement, SIMA) submissions via the external portal - to be automatically validated by CARM system	Are there challenges associated with shifting towards an electronic submission process?	P.
02	System prioritization and distribution of appeals cases	What opportunities do these changes present?	
03	Electronic link of appeal cases to relevant transactions, cases, and client accounts		9
04	Automated feedback loop to inform appeals officers of appeal decision outcomes and associated rationale	Is there any other automated information you would like to receive?	٠. ا



Conceptual system solution



Manage the Publishing of Tariff Calculation Rules and Validation Files

- Potential future state
- Discussion of potential implications
- Conceptual system solution

Topics covered in the workshop



Data Management



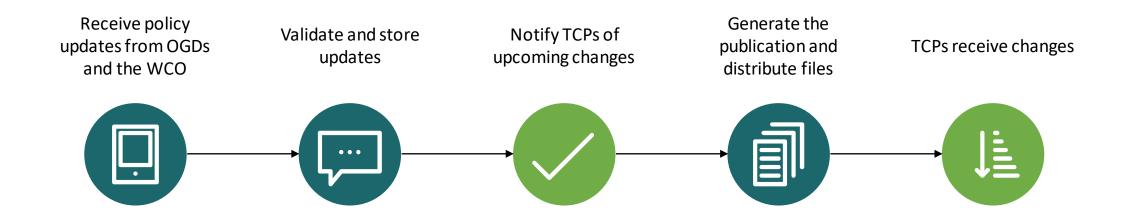
Data Usage (Calculation)

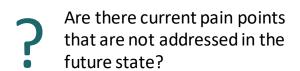


Quota Management & the Tariff Book



Potential future state









Potential future state

Objectives

Maintenance and management of business control data related to the calculation of duties and taxes, quotas, and the Departmental Consolidation of the Customs Tariff (i.e. the tariff book), creating a more user-friendly Tariff Book

Advantages

- ✓ Opportunity for the CBSA and CARM to position itself as the single source of truth for commercial tariff data
- ✓ Reduce manual effort and human error
- ✓ Improve targeting efforts to reduce burden for compliant trade chain partners
- ✓ Simplify importation for TCPs by automating calculation of duties, taxes and tariffs
- Provide a more transparent quota management process

Considerations

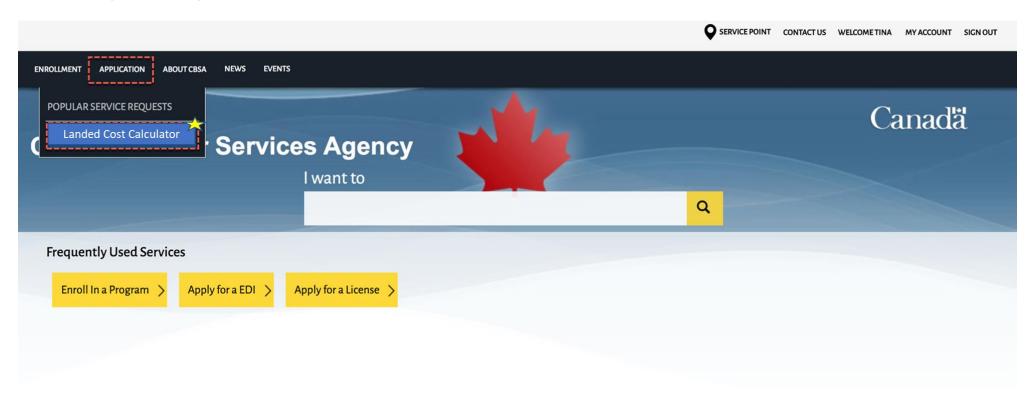
- Broker implication: while the automated calculation represents a change to brokers, small clients will likely still use brokers to help submit their declarations
- ✓ Potential to eliminate CADEX and PDF (manual processes) in data management

Discussion of potential implications

Potential Implications Discussion Estimated duty, tax, and tariff values provided to Do you foresee any issues with the automation 01 importer based on tariff calculation and validation of this process? rules – to be automatically validated by CARM system What pain points do you face with the Tariff Book at present? What improvements would Automated data input and validation, such as Tariff you like to see? 02 Treatment, Value for Duty, Excise Tax Code, etc. for modernized data management How do you feel about filling in multiple fields in order to provide better and more accurate declaration data? 03 Automated quota compliance validation process



Conceptual system solution



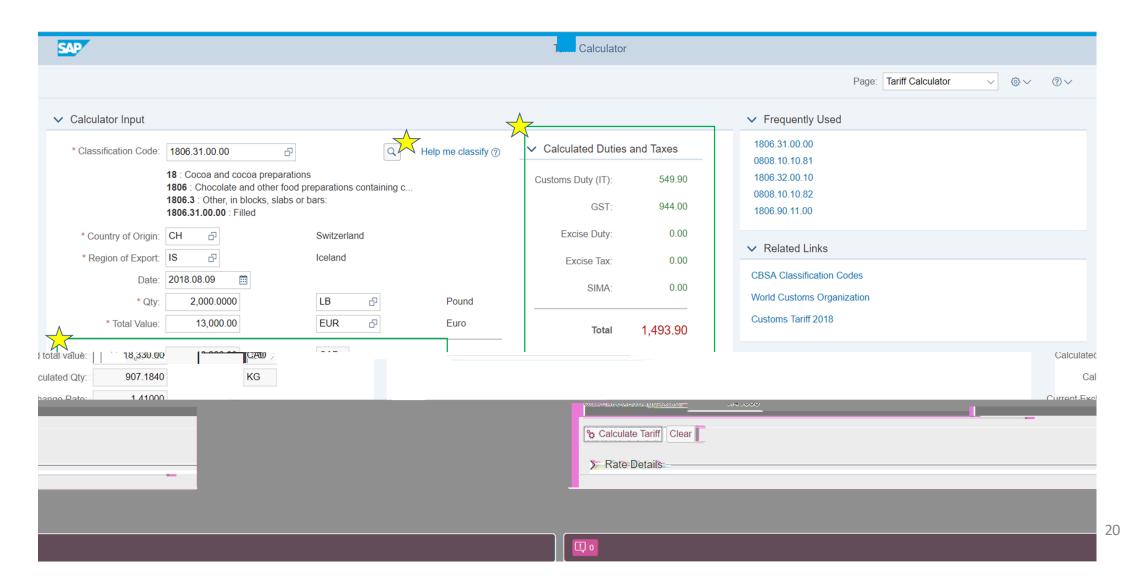








Conceptual system solution



Deployment

Considerations for deployment approach



Deployment Approach

In conversation with the TCPs

TCP considerations are key to a successful CARM deployment, as they influence release strategies, timelines, and client support activities.

As such, we are seeking preliminary feedback from the TCP working group.

Considerations include...

What are the advantages/ disadvantages of a big bang vs phased approach?

What are the considerations for business readiness?

How should we segment the release? By functionality, region, user group, etc.?
What are the limitations to the above?

What are some key considerations for release timelines? E.g., TCP infrastructure and system upgrades, and testing and training requirements.



Deployment considerations



BIG BANG v. PHASED



- Can we use different strategies for different functionalities? For example, Big Bang for 'must have' and Phased for 'nice to have'?
- What functionalities do we prioritize over others?
- What is our risk appetite? Big Bang approaches are quicker but riskier.



SEGMENTATION



Where do we begin the deployment?

Consider the following dimensions:

- By Region
- By User Group
- By Geography
- By Functionalities
- Varying TCP Operating Systems requiring a targeted release
- Other TCP specific conditions for releases



READINESS



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TIMELINES



- Should there be a pilot program?
- Are there competing business activities that need to be taken into account?

Consider the following:

- Infrastructure & system upgrades
- Release schedules
- Testing & Training

 What timelines do we need to keep in mind as we approach go-live?

DEPLOYMENT STRATEGY



Billing cycle walkthrough

- Overview
- Illustrative scenarios
 - 1. Period start to SOA generation date
 - 2. SOA generation to payment due date (transactions associated with billing period A only)
 - 3. Period B transactions
 - 4. Summarizing the due date of transactions occurring across both billing periods



Introduction

Topic	Description
Proposal	Harmonization of billing period and dates associated
Scope	 All HVS transactions/releases occurring the in the period (new assessments) Any TCP initiated changes to the declaration before the respective payment due date (corrections) Any TCP or CBSA initiated changes to the declaration after the respective payment due date (reassessments) Applicable to TCP's enrolled in the RPP program with a valid account
Objectives	 Extended period for submitting corrections for final accounting without impacting the Government of Canada's cash flow Elimination of late accounting penalties Process simplification – combine release and accounting information in one submission Harmonized billing dates – elimination of transactional payments for adjustments and penalties Revenue recognition of the financial liability at time of release, mitigating risk of missed revenue
Transactions in this walkthrough	 High Value Shipments (HVS) Applicable ad-hoc transactions (K23 invoice, Notice of Penalty Assessment, P1 Drawback)
Transactions requiring future discussion	 Low value shipments (LVS) (courier or regular commercial stream) Trusted Trader - CSA Continuous Transmission Commodities – CTC



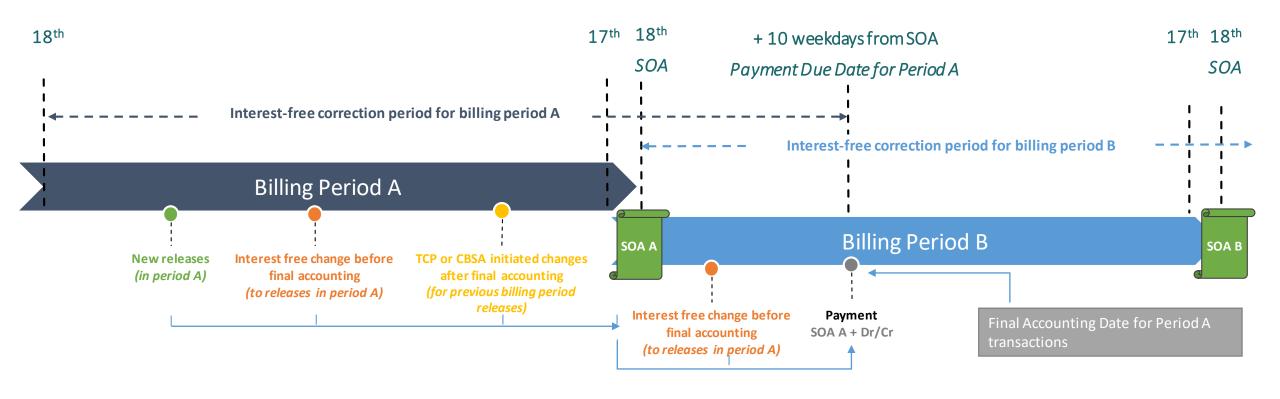
Billing cycle walkthrough

Summary of the billing cycle using the following parameters

Parameters	Description
Accounts	All debits and credits will be applied to a TCP account when the decision is rendered. e.g. when goods are released, when a client's correction is approved, when an appeal or dispute decision is rendered
Billing period	18 th month 0 to 17 th month 1 (e.g. Aug 18 th to Sept 17 th) will be applicable to all debits and credits (e.g. new assessments, corrections, reassessments, ad hoc transactions, etc.)
Statements	Statements will be generated on the 18 th of each month
Payments	Payment of the SOA is due 10 weekdays from the SOA generation
Amount due	SOA amount net of credit or debits from the interest-free corrections
Import declarations	Duties and taxes associated to an import declaration will be posted the day of the release; the number of days to provide final accounting is extended to the payment due date
Credits	Credit corrections or reassessments, are applied to the TCP's account on the date of decision/issuance. All credits will be displayed on the SOA for the billing period on which it falls
Debits	Debit reassessments, are due to the Receiver General on the date of decision/issuance (liability date). Debit reassessments will include interest dating back to the original import declaration liability date (payment due date). These debits will be given an interest free grace period based upon the billing period. The debit will be displayed on the SOA for the billing period on which it falls and due on the respective payment due date. Debit corrections will adjust (increase) the net amount due per the original assessment, corrections by definition occur in the same billing period as the assessment or before the payment due date. Payment on debit corrections is therefore due on the respective payment due date as the billing period of the original assessment. Interest on overdue debits will be calculated from the liability date, which for reassessments is the decision/issuance date and for corrections is the payment due date.



Future State Billing Period High level summary



Note: Corrections are always initiated by the TCP and the term applies to changes to assessments before final accounting i.e. before the payment due date **Reassessment** can be initiated by CBSA or TCP, decision rendered only by CBSA

New Assessment

Corrections

Reassessment

Legend

Illustrative Scenarios

- 1. Period start to SOA generation date
- 2. SOA generation to payment due date (transactions associated with billing period A only)
- 3. Period B transactions
- 4. Summarizing the due date of transactions occurring across both billing periods

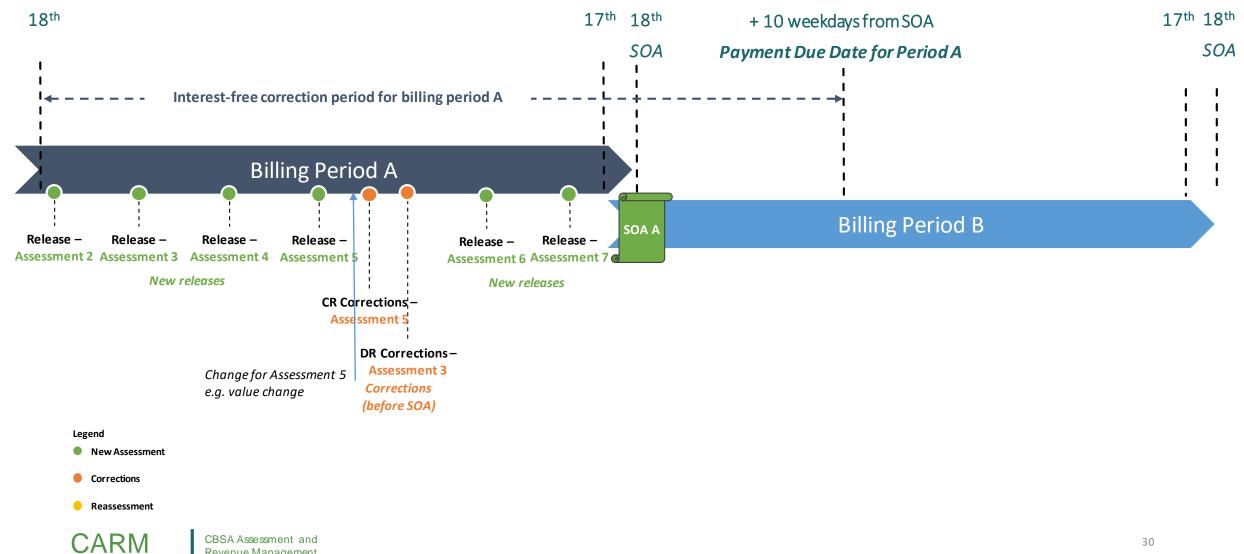


1. Period start to SOA generation date



Future State Billing Period Period start to SOA generation date

Revenue Management



SOA – illustration for Period A

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CBSA: Statement of Account

A Business Information

Account number: <BN 15 Number>
Statement date: August 18, 2018
Statement period: August Statement

Start-End Date: July 18, 2018 - August 17, 2018

Account Summary Previous SOA Balance \$4,500 + Previous period corrections - Refunds/drawbacks \$0 - Cash declarations - Deferred declarations \$0 (\$4,500) - Payments - Other credits \$0 \$11,375 + New declarations + Reassessments \$0 + Penalities \$0 + Interest \$0 \$11,375 **Current Balance**

B <Name Line 1>
<Name Line 2>
<Apartment>
<Address Line 1>
<Address Line 2>
<Province>

D Contact Us
Phone: <insert digits>
CARM Portal: <link>
Person: <insert address>

E	Payment Information				
	Balance as of SOA date	\$11,375			
	Scheduled payment due date	August 31, 2018			

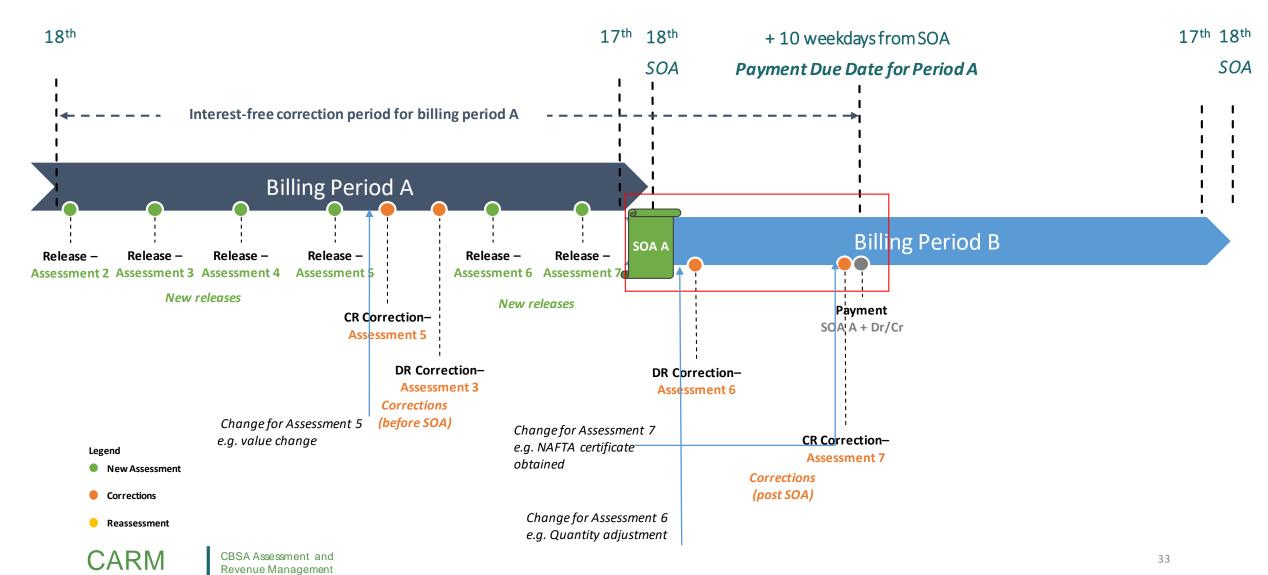
Transaction Details

Transaction Date	Post Date	Transaction Reference	Transaction Description	Debit	Credit
18-Jul	18-Jul	Assessment 2	SID# 2	\$1,000.00	
20-Jul	6-Aug	Assessment 3	SID #3.1	\$800.00	
31-Jul	31-Jul	Payment #1	Payment for July Period		-\$4,500.00
5-Aug	5-Aug	Assessment 4	SID #4	\$575.00	
10-Aug	12-Aug	Assessment 5	SID #5.1	\$4,400.00	
13-Aug	13-Aug	Assessment 6	SID #6	\$600.00	
17-Aug	17-Aug	Assessment 7	SID #7	\$4,000.00	
				\$11,375.00	-\$4,500.00
	Total of transac	tions for current period		\$11,375	.00

2. SOA generation to payment due date (transactions associated with billing period A only)



Future State Billing Periods SOA generation to payment due date (associated with billing period A)



Account balance – payment amount due for period A

- Amount due for Period A = SOA account balance net of credit/debit corrections to declarations in period A
- i.e. liability amount will be adjusted based on TCP initiated corrections to declarations which occurred in Period A
- Any new assessments or debit reassessments occurring from the SOA date to the Payment due date period do not affect
 the liability amount owing on the payment due date for period A
- Credit reassessments will be applied to the account immediately thus also affecting the account balance & amount due
- TCP will be able to view the payment due on the account via portal in addition to the total account balance

Below table illustrates the debit & credit corrections on declarations in period A, which will be displayed on the account view on the portal:

Transaction Details						
Transaction Date	Post Date	Transaction Reference	Transaction Description	Debit	Credit	Cleared
13-Aug	22-Aug	Assessment 6	SID# 6.1	\$300.00		N
17-Aug	30-Aug	Assessment 7	SID #7.1		-\$4,000.00	Υ
Total of debit/credit corrections -\$3,700.00						
						•

SOA (generated on Aug 18th) balance: \$11,375

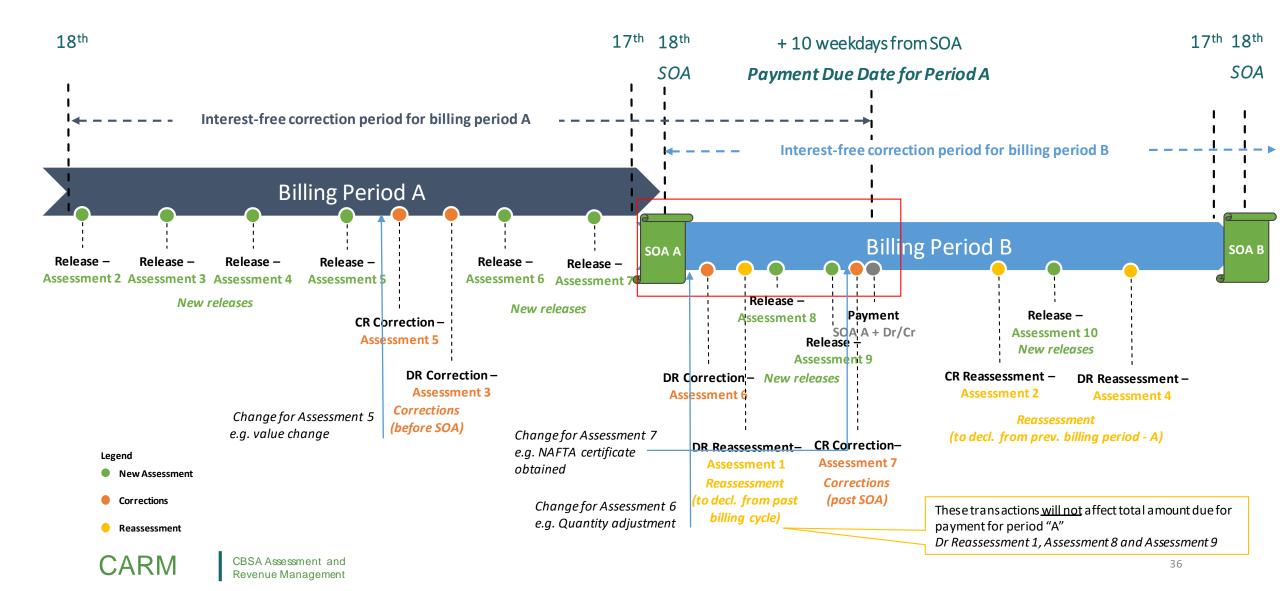
Corrections (after SOA generation): <u>-\$3,700</u> Debit of \$300 to assessment 6 & Credit of \$4000 to assessment 7

Payment amount due on Aug 31st: \$7,675

3. Period B transactions



Future State Billing Periods Period B transactions



SOA – illustration for Period B

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CBSA: Statement of Account

A Business Information

Account number: <BN 15 Number>
Statement date: September 18, 2018

Statement period: September

Start-End Date: August 18 - September 17, 2018

Account Summary Previous SOA Balance \$11,375 + Previous period corrections (\$3,700)- Refunds/drawbacks \$0 - Cash declarations \$0 - Deferred declarations \$0 - Payments (\$7,675) - Other credits \$0 New declarations \$6,600 + Reassessments \$675 + Penalities + Interest \$125 **Current Balance** \$7,400

Name Line 1>
<Name Line 2>
<Apartment>
<Address Line 1>
<Address Line 2>
<Province>

D Contact Us
Phone: <insert digits>
CARM Portal: <link>
Person: <insert address>

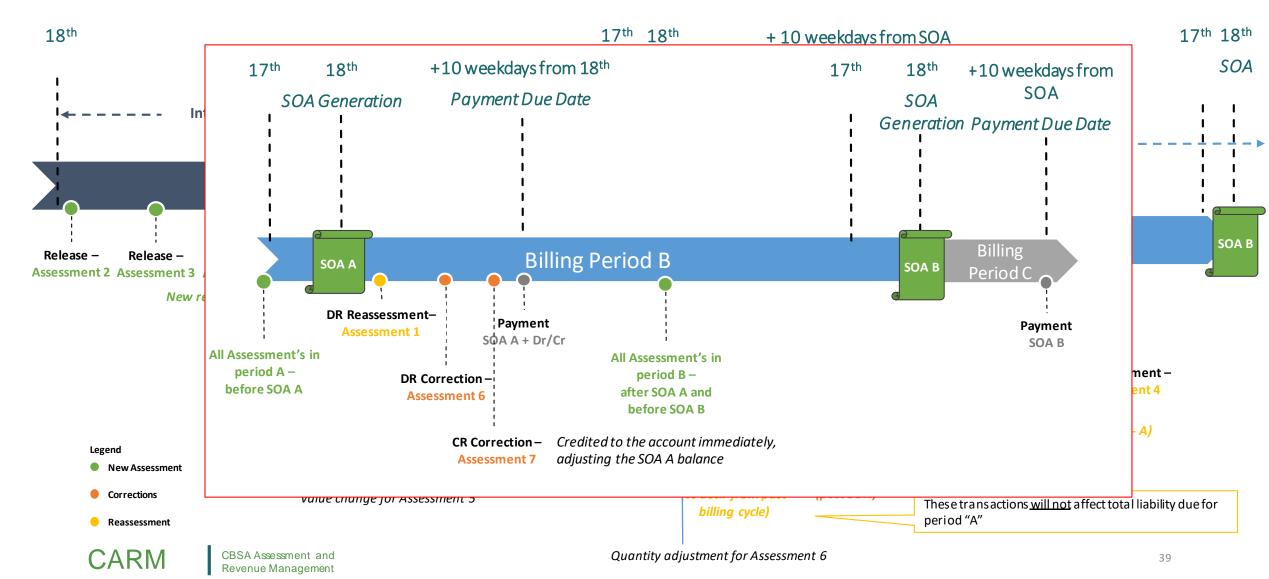
E	Payment Information				
	Balance as of SOA date	\$7,400			
	Scheduled payment due date	October 2, 2018			

F <u>Transaction Details</u>

Transaction Date	Post Date	Transaction Reference	Transaction Description	Debit	Credit
13-Aug	22-Aug	Assessment 6	SID# 6.2	\$300.00	
17-Aug	30-Aug	Assessment 7	SID #7.1		-\$4,000.00
24-Aug	24-Aug	Reassessment 1	SID #1.1	\$1,100.00	
24-Aug	24-Aug	Reassessment 1	SID #1.1	\$1,000.00	
24-Aug	24-Aug	Reassessment 1	Interest	\$100.00	
25-Aug	25-Aug	Assessment 8	SID #8	\$600.00	
26-Aug	26-Aug	Assessment 9	SID #9	\$4,000.00	
31-Aug	31-Aug	Payment #2	Payment for August Period		-\$7,675.00
5-Sep	5-Sep	Reassessment 2	SID #2.1		-\$1,000.00
5-Sep	5-Sep	Reassessment 2	Interest	\$0.00	
10-Sep	10-Sep	Assessment 10	SID #10	\$2,000.00	
12-Sep	12-Sep	Reassessment 4	SID #4.1	\$700.00	
12-Sep	12-Sep	Reassessment 4	SID #4.1	<i>\$675.00</i>	
12-Sep	12-Sep	Reassessment 4	Interest	\$25.00	
				\$8,700.00	-\$12,675.00
	Total of transaction	s for current period		\$7,400.00	

4. Summarizing the due date of transactions occurring across both billing periods

Future State Billing Periods Illustrating payment due dates of transactions in the billing periods



Account view on final accounting date for billing period A *Illustration of final account view at payment due date of billing period A*

See below table which represents an illustration of the information that the online portal account view can provide:

tion Details						
Transaction Date	Post Date	Transaction Reference	Transaction Description	Debit	Credit	Cleared
13-Aug	22-Aug	Assessment 6	SID# 6.1	\$300.00		N
17-Aug	30-Aug	Assessment 7	SID #7.1		-\$4,000.00	Υ
24-Aug	24-Aug	Reassessment 1	SID #1.1	\$1,100.00		N
24-Aug	24-Aug	Reassessment 1	SID #1.1	\$1,000.00		N
24-Aug	24-Aug	Reassessment 1	Interest	\$100.00		Ν
25-Aug	25-Aug	Assessment 8	SID #8	\$600.00		N
26-Aug	26-Aug	Assessment 9	SID #9	\$4,000.00		N
	Payment An	ount Due		\$7,675.00		
	Account I	Balance		\$13,375.00		

SOA generated on Aug 18th balance: \$11,375

Corrections to releases in period A: Credit of \$3,700 (affects only payment amount due)

New releases + reassessments + interests to previous releases: Debit of \$5,700 (affects account balance)

Total payment amount due on Aug 31st: \$7,675

Total account balance on Aug 31st: \$13,375

Comparison of Current vs Future State

	Current	Future
Billing Period	 17th – 18th for goods released during this period Debt on imports are not posted to an account until final accounting All other debit/credits have no set billing period 	 17th – 18th for all decisions rendered during this period Debt will be posted to an account at time of release Includes goods released, adjustments, penalties, etc.
Final Accounting date (applies to import declarations only)	5 business days from release date	Payment due date
SOA generation	• 25 th of the month	• 18 th of the month
Payment due date	Last business day of the month	• 10 week days from the SOA generation date
Credits	Applied to the acc	count immediately
Debits	 Applied to the account immediately Debit adjustments will include interest dating back to the original import declaration liability date (payment due date) These debits are given a 30 day interest free period to pay the total amount of the adjust 	 Applied to the account immediately Debit adjustments will include interest dating back to the original import declaration liability date (payment due date) These debits will have a variable interest free period based upon the billing period (13 to 45 days)

Benefits realized for TCPs

Benefits and Objectives	Benefit Realized?
Extended period for submitting corrections for final accounting without impacting the Government of Canada's cash flow	
Elimination of late accounting penalties	\checkmark
Process simplification – combine release and accounting information in one submission	$\overline{\checkmark}$
$Harmonized\ billing\ dates-elimination\ of\ transactional\ payments\ for\ adjust ments\ and\ penalties$	\checkmark



Additional questions?



Wrap up and next steps

Thank you for your participation. Below are topics for upcoming TCP consultations:

October

- Trusted Traders
- Reporting and analytics (trade)
- Compliance (fraud)
- EDI

