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Trade Chain Partner Working Group (TCP WG)

DRAFT – FOR DISCUSSION PURPOSES ONLY

April 21, 2021

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Teleconference Technical Guidelines

- Join the WebEx information from the invitation, upon joining the meeting the call in details (phone number, meeting ID and access ID) will be provided.
- You will be muted upon joining the meeting, to join the conversation press the unmute button at the bottom-middle of your WebEx screen.
- If you are only calling in, please mute your phone by pressing *6 and unmute your phone press *7 to join the discussion. Once you are finished speaking, please mute your phone again by pressing *6.

Agenda

Topic	Speaker	Timing
Technical Rules of Engagement	Kevin Horseman	9:00AM – 9:05AM
Opening Remarks / CARM Project Update	Goran Vragovic	9:05AM – 10:00AM
Non Resident Importers	Alex Lawton	10:00AM – 10:45AM
Break		10:45AM – 11:00AM
Trade Consultant Portal Access Request Process	Richard Lavoie / Jonathan Hopkins	11:00AM – 11:15 AM
Scenario Walkthroughs	Kim Paradis	11:15AM – 11:45AM
TCP Readiness Update	Kim Campbell / Other TCP WG members	11:45AM – 12:15PM
Roundtable and Conclusion	All	12:15PM – 12:30PM
CARM Communications and Engagement Update	Kevin Horseman	If time permits



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Opening Remarks / CARM Project Update

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CARM Project Update

- CLVS
- ECCRD and API
- Release 1 Playbook and Onboarding Guides
- ARL Clean Up
- End-to-end Walkthroughs



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Non-Resident Importers and Books and Records Requirements

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Importers

- Both resident and non-resident importers can apply for and obtain a Business Number
- Neither the *Customs Act* nor CBSA policy distinguishes between resident and non-resident importers with respect to books and records
 - Expectations are the same for both

Books and Records Requirements

- Section 40 of the *Customs Act* requires every person who imports commercial goods to keep any and all books and records in respect of the imported goods at the person's place of business in Canada or at any other place that may be designated by the Minister
 - This requirement applies to both resident and non-resident importers
- Non-resident importers usually do not maintain a place of business in Canada
 - A customs broker, accountant, or other authorized agent may be designated by a non-resident importer to maintain its records in Canada
 - Non-resident importers may also submit a request for authorization to maintain records at its place of business or another location outside of Canada

CARM, Importers, and Books and Records Requirements

- As part of the registration process within CARM, importers will be asked to identify where they maintain their books and records
- If the location is other than the importer's place of business in Canada, the importer will need to identify this other place and request permission to maintain books and records there
 - This applies equally to resident and non-resident importers
- Importer registration reflects the current legal requirements pertaining to books and records and will enable the CBSA to be more efficient in its dealings with importers



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Trade Consultant Portal Access Request Process

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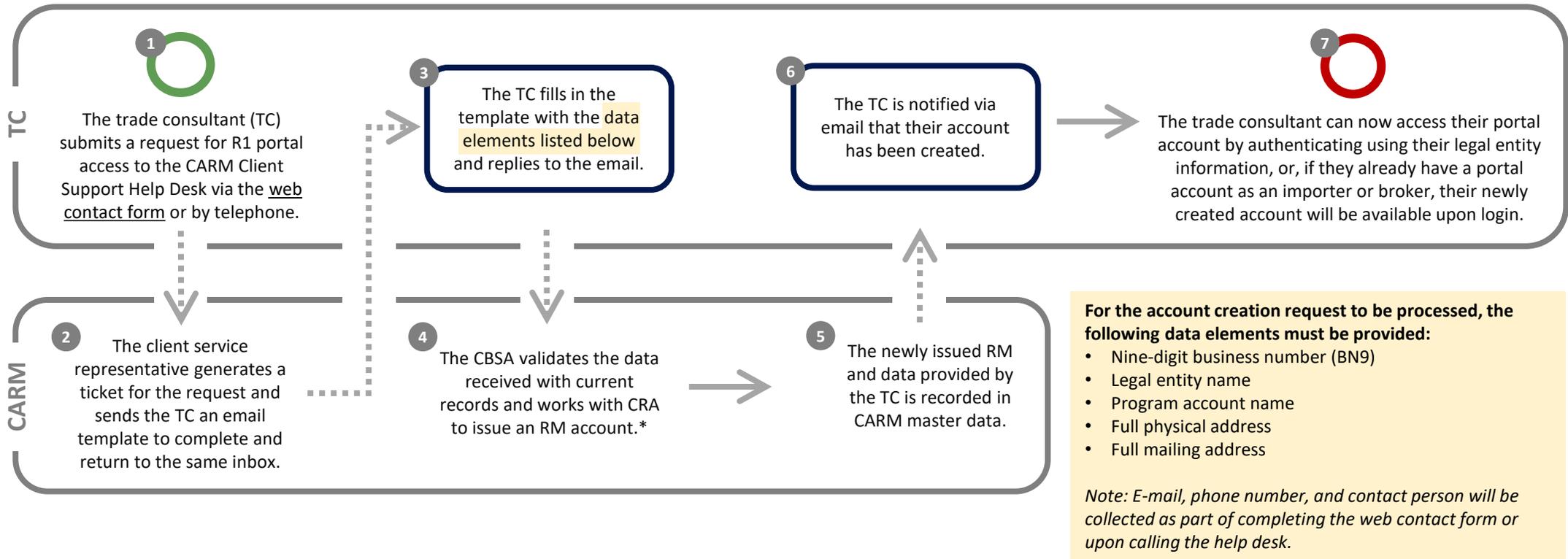
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How can trade consultants gain access to the CARM Client Portal (CCP) at R1?

To facilitate the electronic submission of rulings during CARM R1, trade consultants can obtain portal access on an as requested basis via the following process.

Process to obtain access



* The RM account type created for the duration of R1 will be the same type that is being created for customs brokers during R1. While there is no impact to trade consultants or customs brokers, this is an interim measure during R1 only and will be addressed by the CARM team as part of R2 go-live when all commercial clients will be able to obtain portal access.



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Scenario Walkthroughs

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Scenario #1 – Highway Border Processing

“There are 10 shipments on a truck, one of the shipment’s importers doesn’t have financial security and the truck arrives at the border” **What now?**

Scope:

- Clearance processing of commercial goods through the commercial stream
- Implementation of the new financial security model (Importer RPP) – R2

Assumptions:

- Determination by broker that goods are commercial and will be acting on behalf of their client who is authorized to account for the shipment in accordance with Sect. 32 of the *Customs Act* (e.g., “...importer or owner of the goods...”)
- Carrier has complied with the pre-arrival conveyance and cargo reporting requirements (ACI) within the mode specific timeframes

Interim Accounting Post CARM R2 - Foundational Requirements

IID, PARS and RMD processing

- All interim accounting releases (IID, PARS, RMD), regardless if paper or electronically must contain a the commercial importer's BN15
- RPP must be linked to the BN15 quoted on the release document
- Upon receipt of the release document, CBSA commercial systems will validate RPP eligibility against the BN15 **Note:** This is a change from current system validation done today which validates against the account security number
- If the BN15 owner has not enrolled in the RPP program, the CBSA system will issue a key validation error against the transaction number - "100583-3 INVALID CLIENT PRIVILEGE CODE" on the Request ID" **Note:** This error message is not visible to BSOs
- This new error message will be mapped to an external error code (still to be assigned) and added to the ECCRD list of errors
- Absence of delegated authority to broker within the CARM Client Portal (CCP) does not have implications on release processing. CCP delegated authority must be in place for broker to be able to file final accounting (CAD Type AB and C)

Highway Border Processing – Carrier/Cargo Reporting

Absence of RPP post R2 will be treated in the same manner as “Failed PARS” scenarios are dealt with today

- A “Failed PARS” scenario occurs when a release is expected to be on file at FPOA and is not
- Regardless of reason “why” the release is not on file (e.g., no RPP, no commercial BN15), outcome remains the same - “Failed PARS” scenario is triggered
- Carriers will exercise the same options available to them today for such scenarios.
- Cargo reports transmitted by carrier (1hr prior to arrival) receive a series of “completeness” notices which indicate whether or not the related release is on file
- Carriers have ability to change the port of destination on cargo report (e.g., from FPOA to inland) anytime up until arrival at PIL
- Upon arrival at PIL, change to the port of destination to an inland location can be facilitated by PIL BSO. Conveyance then authorized to move triggering related notices (e.g., released or reported)
- Carriers are required to notify broker of any change to port of destination

eManifest Notices available to PNP and ANPs

CLIENT TYPE	COMPLETENESS NOTICES				NOF	RPTD	ARVD	RLSD	A2DEL	HELD	DECON	FLE	FLI
	NM	M	CC	DPC									
Primary Notify Party (ANP)													
Carriers	Y	Y	Y	Y		Y	Y	Y	Y	Y	Y	Y	Y
Freight Forwarders	Y	Y	Y	Y		Y	Y	Y		Y	Y		
Account Security Holders	Y	Y						Y	Y	Y			
Automated Notify Party (ANP)													
Carriers					Y			Y	Y				
Freight Forwarders					Y			Y					
Account Security Holders						Y		Y	Y				
Warehouse Operators						Y	Y	Y	Y	Y	Y		
COMP – Completeness NM - Not Matched M – Matched CC – Cargo Complete DPC – Document Package Complete NOF – Document Not on File					RPTD – Reported ARVD – Arrived RLSD – Released A2DEL – Authorized to Deliver DECON – Deconsolidation FLE – FAST Lane Eligible FLI – FAST Lane Ineligible								

Border/Release Process – Broker/Importer

Processing and options available to broker/importer

- Broker will receive error message if importer is not approved for RPP. This should be your immediate “red flag” that action is required
- Broker contacts importer to enroll in RPP and/or create CCP account (if new importer)
- Enrollment in Importer program is immediate offering a fully automated process that does not require intervention by CRA or CBSA.
 - **Exception:** NRIs who are seeking to maintain books and records outside of Canada
- Importer must enroll in RPP and post security as part of the RPP enrollment process in order to benefit from release prior to payment privileges.
 - **Note:** Deposits made to client account are not sufficient to obtain RPP
- Once completed, broker may re-transmit interim accounting release request. All interim release options may now be submitted either pre or post arrival of goods
- If RPP cannot be established within timeframe suitable to importer, alternate form of security or a CAD C-type will need to be presented to commercial office where goods are located

CAD C-type Process

Shipments manifested in bond to inland sufferance warehouse – No RPP

- If importer does not have RPP, the only option available for release is the CAD C-type
- “Cash” and “on account” C-types will still be available.
- Commercial importers must have a CCP account (enrolled in importer program) in order to complete the CAD C-type
- CAD C-type are to be entered by the importer or broker (portal delegation required) into the CCP. May be done in advance.
- All CCEPS terminals at commercial office locations will be replaced providing CCP access to clients.
- Functionality available to print the completed C-type. Presentation of hard copy C-type required along with supporting documentation (cargo document, invoice(s) and applicable OGD permits/licenses) to commercial office or via eLongroom procedures where available (PDF).
- Shipment will be captured and released in ACROSS system by BSO and payment processed in CARM
- C-types may only be presented to CBSA commercial office once goods have arrived and are available for exam

Preventing delays at the border



Broker/Importer

- Working with your clients in advance of R2
- Integrate CCP enrollment into “new client” process
- Immediate action anytime reject is received
- Promote alternate means of posting security when timeframes are tight



Carrier

- Subscribe and take action prior to arrival when “completeness” notice(s) not received
- Ensure brokers are notified if port of destination is changed



CBSA

- Issue communications to carriers to raise awareness of R2 implications
- Close monitoring of RPP uptake pre and post R2
- Commitment to work with all stakeholders to avoid unnecessary border disruptions where possible



Discussion

- Questions?
- Future scenarios walkthroughs?



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TCP Readiness Update

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Trade Chain Partners - State of Readiness

Industry TCPs - April 21, 2021

Key Areas:

R1 Go Live

- Need update on state of readiness and communication plan.
- Review implications of ARL clean up.

Technical Support

- Need regular cadence of technical support calls scheduled.
- Current state is to schedule when CBSA deems appropriate with insufficient lead time.
- Schedule calls by sections of the ECCRD (Sections 1.0 to 3.0 on one call, 3.0 Corrections on one call).
- Need all ECCRD information completed (i.e. exchange rate API still to be provided).
- Inaccurate use cases in the ECCRD. Have been identified and need to be corrected.
- Still waiting for Data Elements Matrix (GAP Analysis – What has Changed?).

Key Areas continued:

Operational Workflow

- Walkthrough of real-world scenarios. This has been requested since 2011. Need to prioritize for completion as impacts solutioning and TCP understanding of end state.
- Industry TCPs will collaborate to create scenarios for walkthroughs in a separate forum.

RPP (Release Prior to Payment Privilege)

- Need update on the RPP Onboarding process to include the decisions made between SAC (Surety Association of Canada) and CBSA.

Regulatory Package

- Respecting “Cabinet Confidence” need to have visibility and understanding of the main components of these changes including timelines.



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Roundtable and Conclusion

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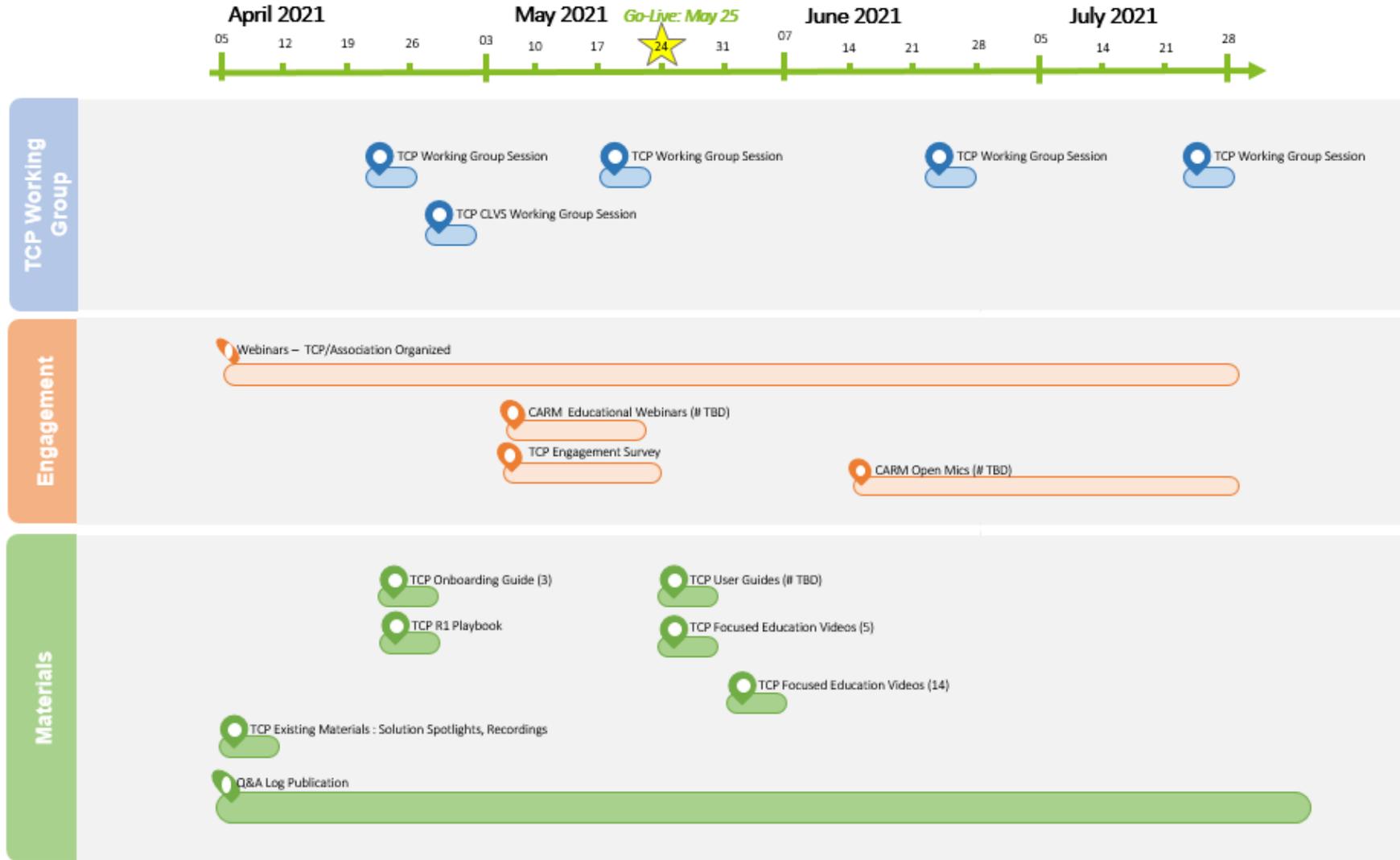
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Updated TCP WG Activity Calendar

The following outlines the proposed schedule for the next few months of TCP WG activities.

Month	Activity	Date
April	CSCB Webinar Series	March 10 to May 5 (<i>bi-weekly</i>)
	Technical Working Group Session	April 28
May	CARM Onboarding Webinars	TBC
	UPS Webinar	May 5
	TCP Working Group Consultation Session	May TBD
June	Thompson Ahern International Webinar	June 17
	TCP Working Group Consultation Session	June TBD

CARM Communication & Engagement Update



R1 Support Material Overview

Google Drive will be an easy-access and easy to share location for information

	Resource	Description
Contact	Contact Card	Reference sheet on the ways to contact CARM for more information.
Educational Information	Onboarding Guides (NEW)	Guide that provides onboarding information such as checklists for pre-/post- Go-live, and summary information on key R1 functionality. Three tailored versions: Custom Brokers, Trade Consultants, Importers.
	R1 Playbook (NEW)	Clarification document on concepts, terms, processes, etc. that are referenced on the new portal.
	User Guides (coming May 2021)	Detailed information on specific functionality, incl. screenshots and step-by-step guided information.
	Educational Videos (coming May 2021)	List of videos to access on the CBSA YouTube Channel. Videos that walk through sections of the portal.
	Solution Spotlights	Existing short information packages on specific functionality or process information.
News	CARM Newsletters	Past quarterly newsletters and the upcoming May publication
Project and Background Information	Infographic	Brief overview of CARM Release 1 and Release 2 features.
	Important information for importing into Canada	Brief overview of CARM and its key changes to importing into Canada.

- Pre Release 1 Go-live: click here [CARM Google Drive](#) to access the above resources
- Post Release 1 Go-live: onboarding materials will be shared directly on the CARM Client Portal main page

Thank You!

For more information:

- Visit the [CARM section of the CBSA website](#)
- Visit the [CARM Google Drive](#) for resources
- Join the [CARM LinkedIn Group](#) for the latest news
- Questions? Email: [CBSA.CARM_Engagement-Engagement de la GCRA.ASFC@cbsa-asfc.gc.ca](mailto:CBSA.CARM_Engagement-Engagement_de_la_GCRA.ASFC@cbsa-asfc.gc.ca)
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