Trade Chain Partner Working Group (TCP WG) Consultation Session

DRAFT - FOR DISCUSSION PURPOSES ONLY

July 29, 2020





Teleconference Technical Guidelines

- Call in to the meeting by dialing the number provided in the invitation.
- Please mute your phone by pressing *6
- To unmute your phone press *7 and join the discussion, it is helpful for participants if you can identify yourself before speaking
- Once you are finished speaking, please mute your phone again by pressing *6
- To answer an incoming call, please hang up the line and call back into the meeting. Putting the call on hold may cause the group to hear background music or beeping.



Agenda

Topic	Speaker	Timing
Technical Rules of Engagement	Kevin Horseman	9:00AM – 9:05AM
CARM Project Update	Lisa Anawati	9:05AM – 9:50AM
C-Type Walkthrough	Marty Aube / Jonathan Hopkins / Jason Porteous	9:50AM – 10:35AM
Voluntary Entries	Marty Aube / Jason Porteous	10:35AM – 11:05AM
Definition of Accounting Date	Marty Aube / Jonathan Hopkins	11:05AM – 11:20AM
Portal User Experience Sessions	Kevin Horseman	11:20AM – 11:30AM
Communications and Engagement Update	Kevin Horseman	11:30AM – 11:40AM
Roundtable & Conclusion	All	11:40AM – 12:00PM



CARM Project Update





CARM Project Update

- Release Plan
- ECCRD & EDI Playbook
- Financial Security
- CSA
- CLVS
- Delegation of Authority



QU	ESTION	ANSWER
1	Has CARM reviewed the file size limitations of uploaded documents?	The current file size limitation for documents sent via EDI is 25MB with a line item limitation of 5000, however CBSA Policy may also set limits. CARM is currently reviewing options for possible exceptions. CARM is also reviewing file size limitations for documents uploaded on the portal.
2	Will Brokers have their own Broker program identifier (RM) at Release 1?	Yes, Brokers will have their own Broker program identifier (RM) at Release 1. CARM is working with the program areas to determine the process and timing for this to be completed.
3	Does the CBSA know what 12 month period will be used to ascertain the highest month of duties/taxes?	The current 12 month timeframes for calculating RPP security are from July 25 th to July 24 th , with updates required by October 15 th of each year. For consistency and simplicity, this model is proposed to continue. For importers without 12 months of history, an estimation will be permitted as it is today.



	QUESTION	ANSWER
4	If an importer's goods are duty free and GST exempt and therefore their highest amount of duties/taxes calculated is 0 or very limited, will they require a minimum bond?	If an importer's highest monthly accounts receivable is zero (\$0), no minimum bond will be required. If an importer does start to import goods that result in a payable, or if the importer is issued an AMP or adjustment, the solution will monitor and measure their security utilization and nudge them to provide security per the requirements. It is incumbent on the importer to maintain adequate security to cover their accounts receivable per the requirements. Note: Account security for RPP will continue to be required for interim accounting (e.g., IID; PARS; RMD).



	QUESTION	ANSWER
5	Will the CBSA post the amount of RPP financial security on the CARM Client Portal (CCP) in Release 1 or will the CBSA advise the importer of the amount through another mechanism?	The CBSA will display the <u>minimum required</u> (and therefore mandated) amount of security on the CCP as of CARM Release 2. It is incumbent on the importer to maintain adequate security to cover their accounts receivable per the requirements. For importers who wish to obtain a bond in preparation for CARM R2 (i.e. between R1 and R2), they will need to calculate the amount of surety required as they do today (see <u>D17-1-8</u>). Importers may also post a higher amount than the minimum required amount. For importers who already have bonds, (i.e. are enrolled in the importer direct security option), they can continue to use them after R2 as the information will be converted into the CARM solution. These bonds will be converted into the CARM system at cutover, prior to R2 go-live. Upon conversion, a bonded indicator will be applied to the importer's account allowing them to continue to obtain release on minimum documentation as of R2 go-live. If an increase in security is required, a rider can be applied prior to or post R2 go-live.

^{***} Draft concepts are provided for discussion and are subject to change ***

	QUESTION	ANSWER
6	Will the amount of RPP financial security be recommended or mandated?	The amount represents the <u>minimum required</u> (and therefore mandated) amount of security. This is in line with the current CBSA policy in effect today. Should an importer be winding down their business or anticipate a reduction in monthly AR, CARM Release 2 will provide functionality to request a lower amount, which will trigger an approval process within CBSA. Additionally, as of Release 2, CARM will track and monitor RPP bond utilization in real-time, as well as nudge importers who are approaching or beyond their limit based on current AR and security posted. Utilization information for RPP will be available on the CCP for the importer to view at CARM R2. A broker with the appropriate delegation of authority could also view an importer's current utilization via the CCP.
7	Kindly confirm if SIMA is calculated in the bond amount or only duties and taxes including GST?	Yes, the calculation is based on highest monthly <u>accounts receivable</u> over 12 months, and therefore inclusive of all payables including SIMA.



CBSA Assessment and Revenue Management

	QUESTION	ANSWER
8	Will hospitals and universities require a bond?	Yes, if a hospital or university imports and would like to obtain RPP as of CARM R2 go-live they will require a bond. The current policy states that any Institution who is not a federal or provincial department, agency, or ministry must post security to participate in the RPP program; it will continue to apply after R2 goes live. Additionally, the CBSA currently holds importer bonds for a number of universities.
9	Will the RPP Financial security have an impact at the time of release? It is my understanding that the importer number used must have a RPP bond secured or else the release will be rejected. An importer without RPP financial security can either pay cash at the time of clearance or can apply for a one time RPP bond.	For an importer to obtain release prior to payment (i.e. release at the border without paying for the goods), they must enroll in the RPP program and post security with the Agency. Security can be posted in the form of a cash bond, a surety bond, or a one time bond. Without security, an importer will be required to pre-pay, or pay at the border, for the goods to be release into the Canadian economy.

	QUESTION	ANSWER
10	Why are APIs for items like tariff data being pulled from the TCPs instead of CBSA pushing updates to TCPs?	 During CARM Design we considered both "push" services and "pull" services. The "pull service" method was determined to be ideal solution for the following key reasons: The API solution aligns to CBSA's Enterprise Architecture directions, and Government of Canada Open Data (GC API) approach to providing data publicly. Simplicity: TCPs can connect to the public API system at any time. Modernization: API Services are a more modern approach to transfer public data. TCPs will be able to query at any time that best fits their operations. Performance: Providing data upon request in real-time minimizes processing time for both TCP systems and CARM. Note: Additional information on the rationale for the API can be found in Appendix.



C-Type Walkthrough





Submission of CAD to Obtain Release Process

This process covers CADs submitted to obtain release and provide accounting at the same time (current B3 Type C)

The Importer / Customs Broker prepares a CAD via the CARM Client Portal (CCP), either off-site or in the customs office (where available) prearrival, arrival, or post-arrival. The debt will not be posted until a release decision is rendered in ACROSS.

The CARM System calculates the duties and taxes based on the information provided in the CAD. The Importer / Customs Broker receives the outcome of the duty and tax calculation, along with notification to print the CAD for goods release processing. Note that both the goods and the Release/Accounting documentation are subject to CBSA review. which could change or impact the duty and tax calculations.

The BSO reviews the release and accounting package, including any required permits, certificates, etc. If changes are required to the CAD, the BSO rejects the package and does not release the goods, directing the TCP to make the necessary changes to the CAD and return for processing*. If no changes are required, the BSO processes the shipment accordingly.

Post duties and taxes

If the Importer is a 'cash' client, or chooses not to use their RPP bond, the Importer or authorized representative is directed to the cashier to make payment. The cashier applies the payment to the transaction, or if the Importer or authorized representative has an existing payment / credit on their account, applies it accordingly at the direction of the Importer or authorized representative. Once payment has been made, the cashier stamps one copy of the CAD and provides the "released stamped" copy to the Importer or authorized representative along with a payment receipt.

Receive



Submit Commercial Accounting Declaration (CAD)



Print CAD and provide release and accounting package to Validate CAD **Customs Office of Release**



Calculate duties and taxes



representative (with the appropriate

delegations) prints two copies of the

required permits, certificates, etc. The

Importer or authorized representative

submits the release and accounting

package to the customs office for

processing.

CAD and assembles the release and

accounting package, including any

The Importer or authorized

Process shipment

(if required)



The release decision triggers the posting of the debt and the update in status of the CAD to 'complete'. The CARM System re-calculates the duties and taxes based on the information provided in the CAD, and the value of the duties and taxes are posted to the Importer's accounts receivable sub-ledger. Payment due dates and interest applicable dates are assigned based on the release date.

The Importer and Customs Broker (if delegated) receives a message of the outcome of the assessment process, including the results of the duties and taxes calculation. At this point, the Importer / Customs Broker can view the CAD on the CCP and make changes, as required.

The CARM System validates the CAD for completeness and formatting. If the CAD passes validation, the CAD is accepted into the CARM System. If the CAD does not pass validation, the Importer / Customs Broker is notified of the rejection, including the reason for rejection, and can correct accordingly.



*Note: The CBSA will not/cannot change any information on the CAD within the CCP. Only the Importer / Customs Broker can do this.

Other scenarios

While the process presented should cover a large volume of the CADs used to obtain release, there are exception scenarios that add additional steps

What if I do not have a BN9?

The Importer must either:

- Complete the register client process on the CCP; or
- Contact the CRA to register for a BN9

What if I do not have an Importer Program Account (RM Extension / BN15)?

The Importer must complete the program enrolment process on the CCP

What if I am at a POE or in-land office without access to the CCP?

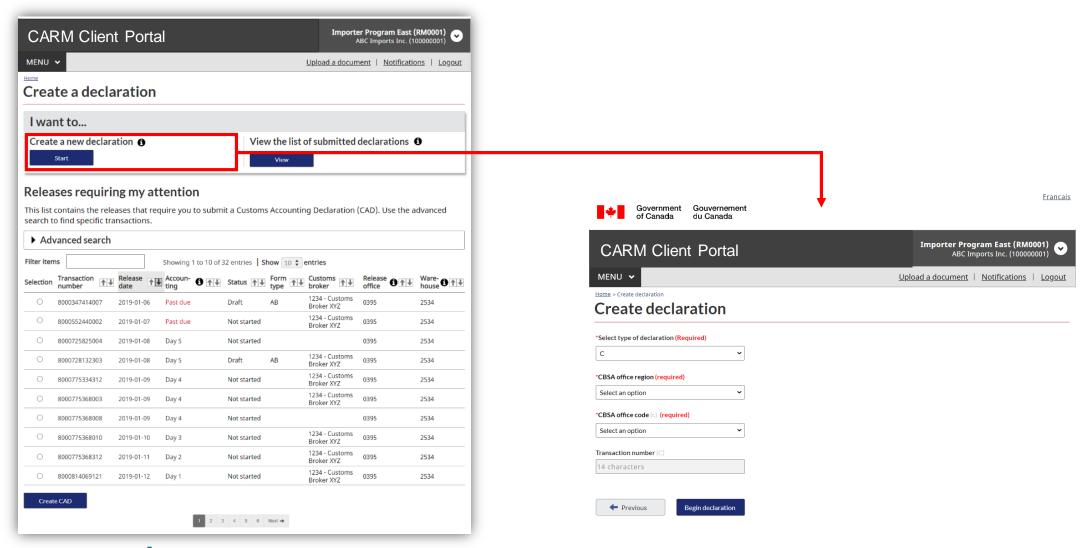
- The CARM Project is working with the appropriate OPIs to clarify where CPP access will exist, and what processes will be available
- The CARM Project will communicate access and processes at a later date

What if a commercial carrier is presenting the release and accounting package, and information needs to change?

• The commercial carrier must work with the Importer / Customs Broker to update the CAD for resubmission



Creating a CAD (Selecting a type)





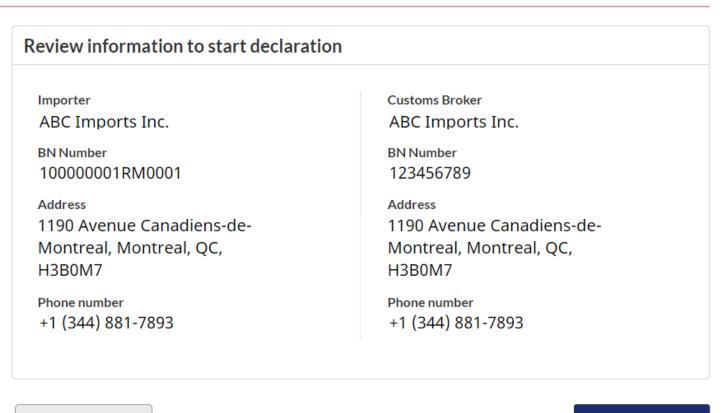
Creating a CAD (Filer(s) Information)

Previous

Home > Create declaration

Create declaration

Overview Draft Status: 10-1 Type: Transaction #: 11111111111111 Step 1: General Details Step 2: Warehouse Step 3: Invoices details Step 4: Review & Submit Step 5: Add attachments **Estimated Duties and Taxes** 0.00CAD

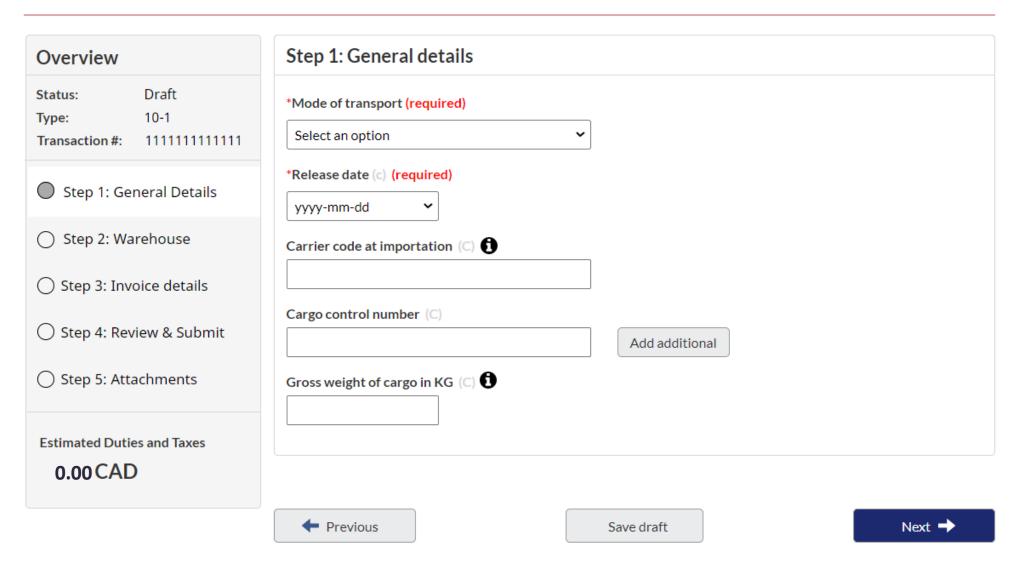




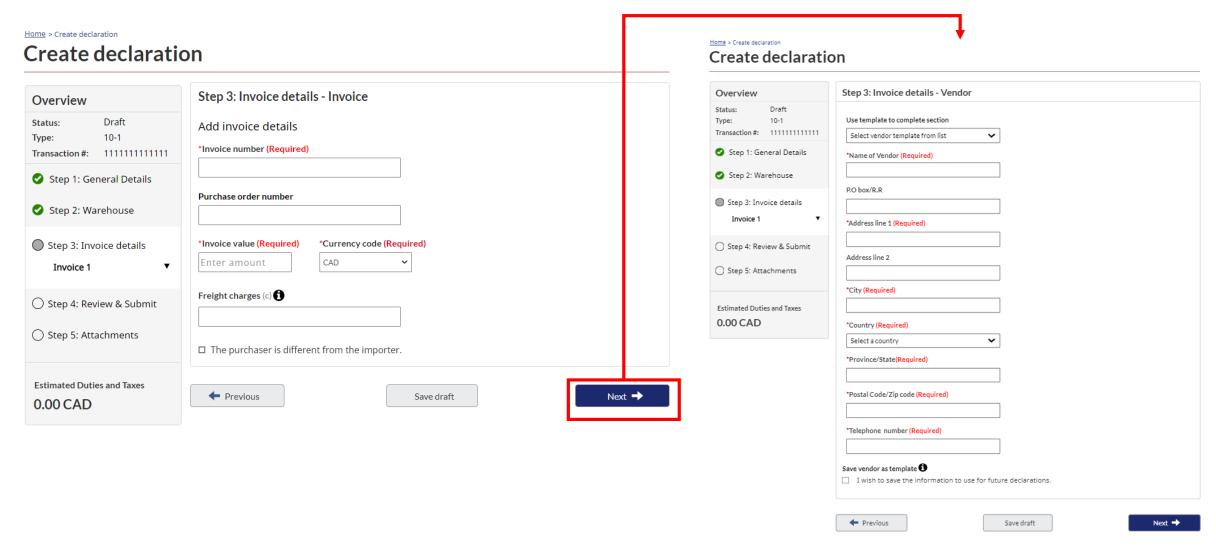
Start

Creating a CAD (General details)

Create declaration

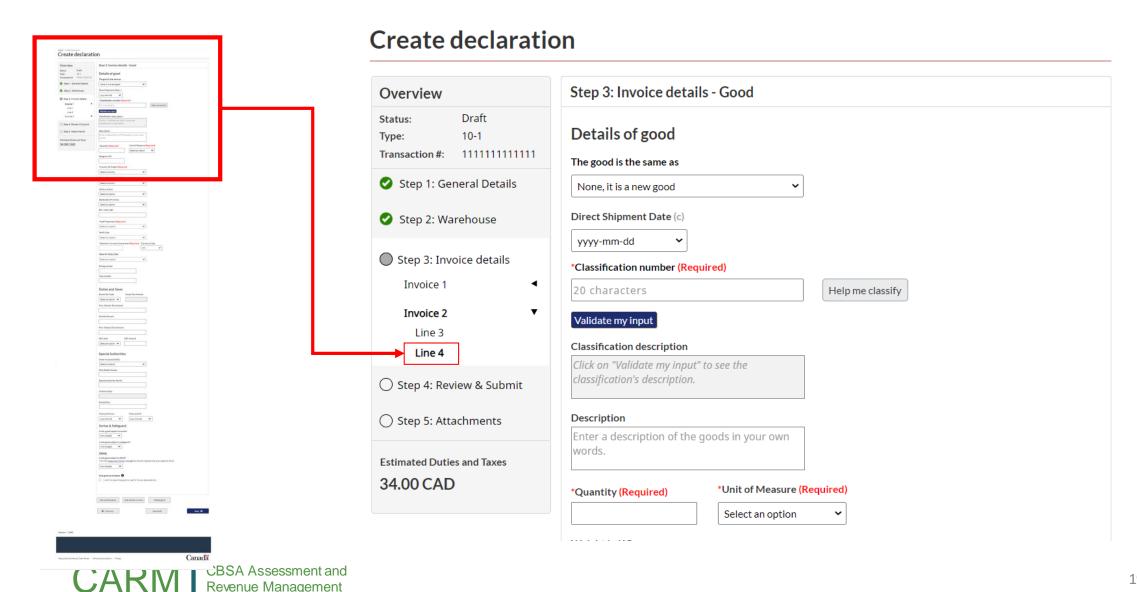


Creating a CAD (Invoice details - Invoice)

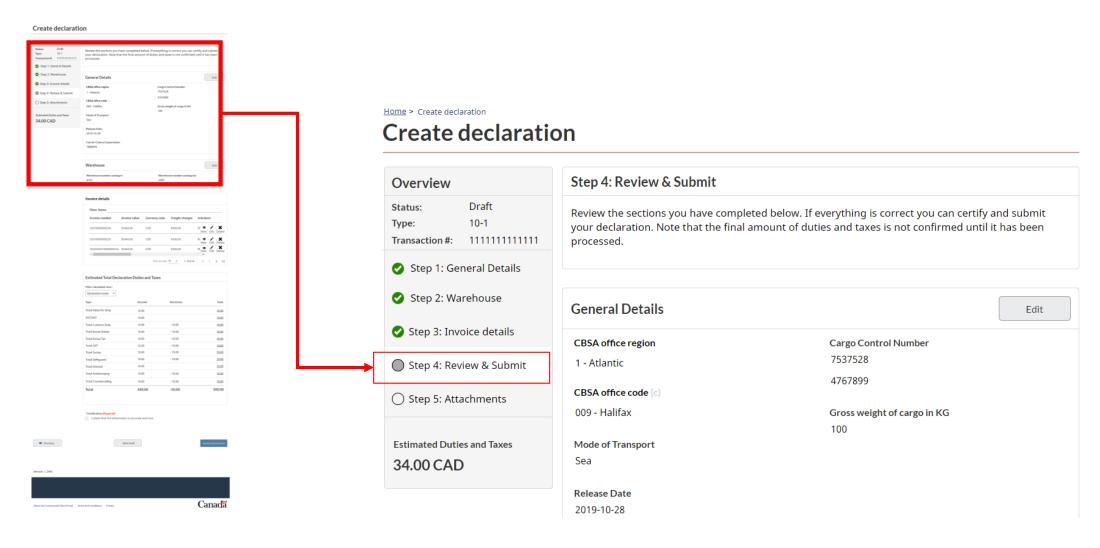




Creating a CAD (Invoice details - Goods)



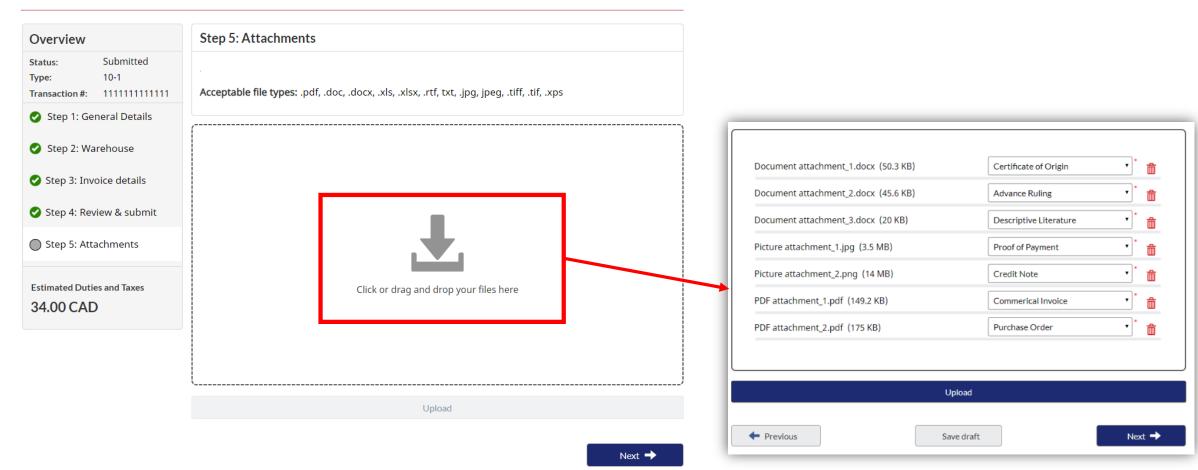
Creating a CAD (Reviewing before submitting)





Creating a CAD (Attaching files)

Create declaration





Creating a CAD (Submitting and printing)

Declaration submitted

Transaction number: 56310000000241

Form bundle no: 1918223637

Status: Submitted

Thank you for submitting your Customs Accounting Declaration (CAD). When your CAD has been processed you will receive a notification through the notification centre.

Stimated declaration duties and taxes ①			50,053.15 CAD	
Туре	Amount	Remission	Total	
Value for Duty	494,000.00		494,000.00	
PST/HST	0.00		0.00	
Customs Duty	24,103.00		24.103.00	
Excise Duties	0.00		0.00	
Excise Tax	0.00		0.00	
GST	25,950.15		25,950.15	
Surtax	0.00		0.00	
Safeguard	0.00		0.00	
Antidumping	0.00		0.00	
Countervailing	0.00		0.00	
Interest	0.00		0.00	
Total	50,053.15		50,053.15	

Download and Print

Download a version of the declaration you have just submitted to print.



← Back to list of declarations

Version: 1.2445

Canada

Download and Print

Download a version of the declaration you have just submitted to print.



Commercial Accounting Declaration (PDF, 273 KB)

22 About the Commercial Client Portal - Terms and conditions. - Privacy

Additional questions?





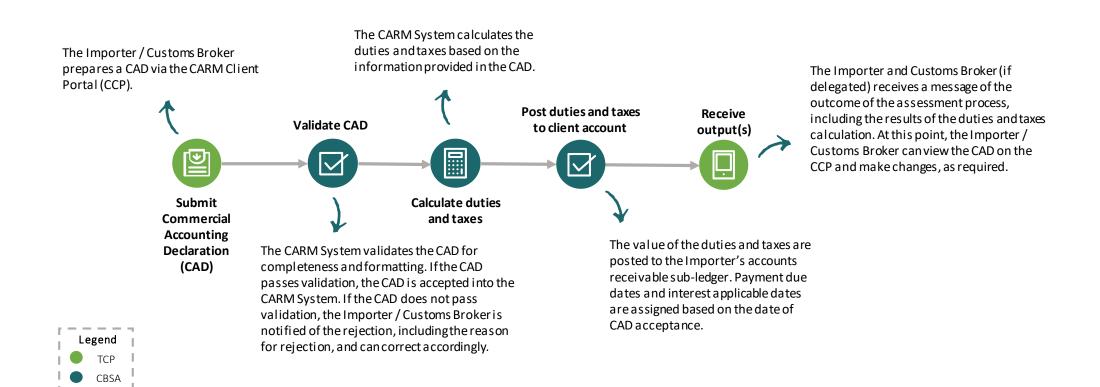
Voluntary Entries





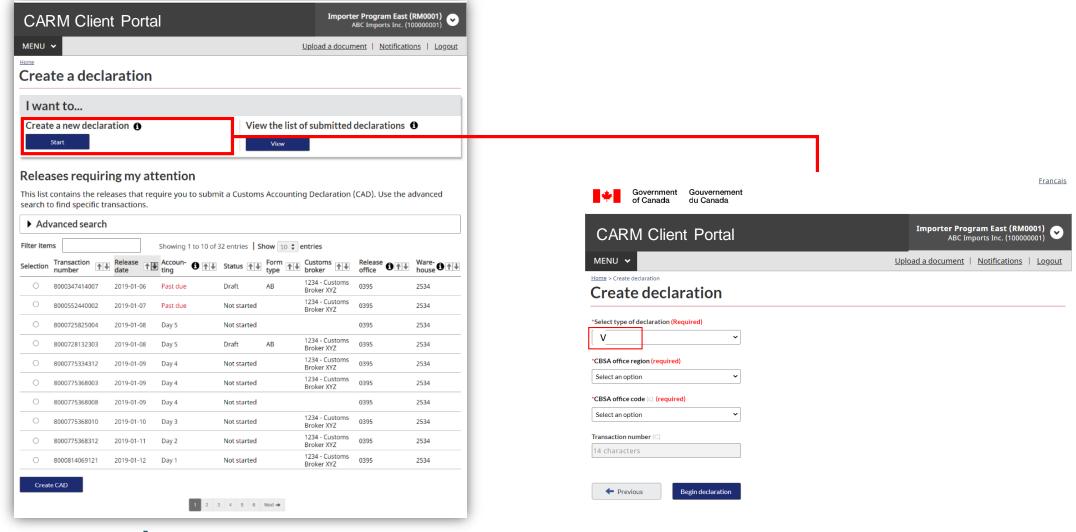
Submission of Voluntary CAD

This process covers CADs submitted for goods that entered Canada without a release decision in reference to the GC voluntary disclosure policy (current B3 Type V)



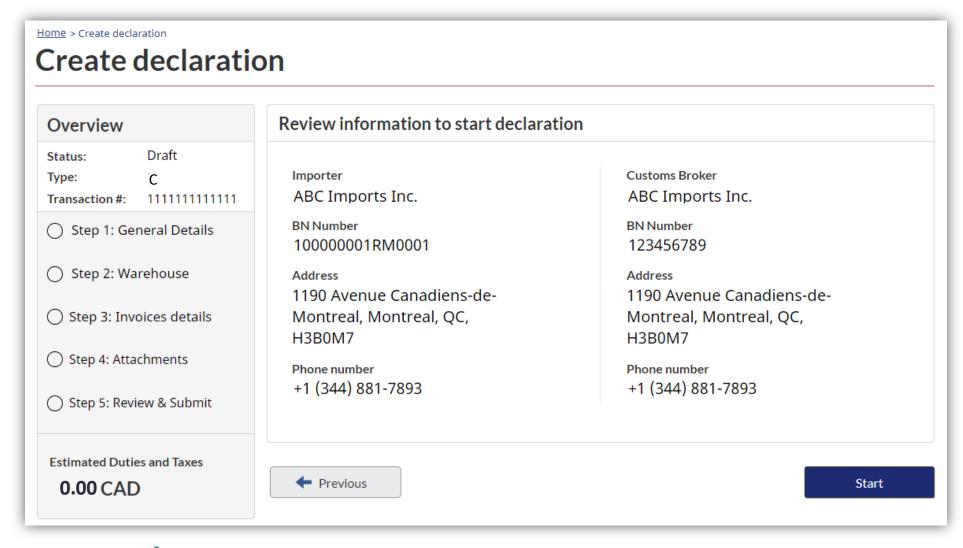


Creating a CAD (Selecting a type)



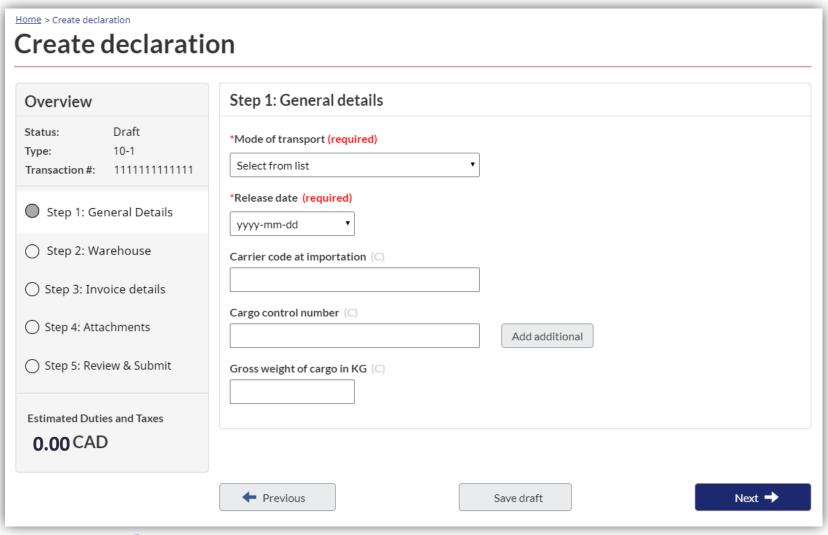


Creating a CAD (Filer(s) information)



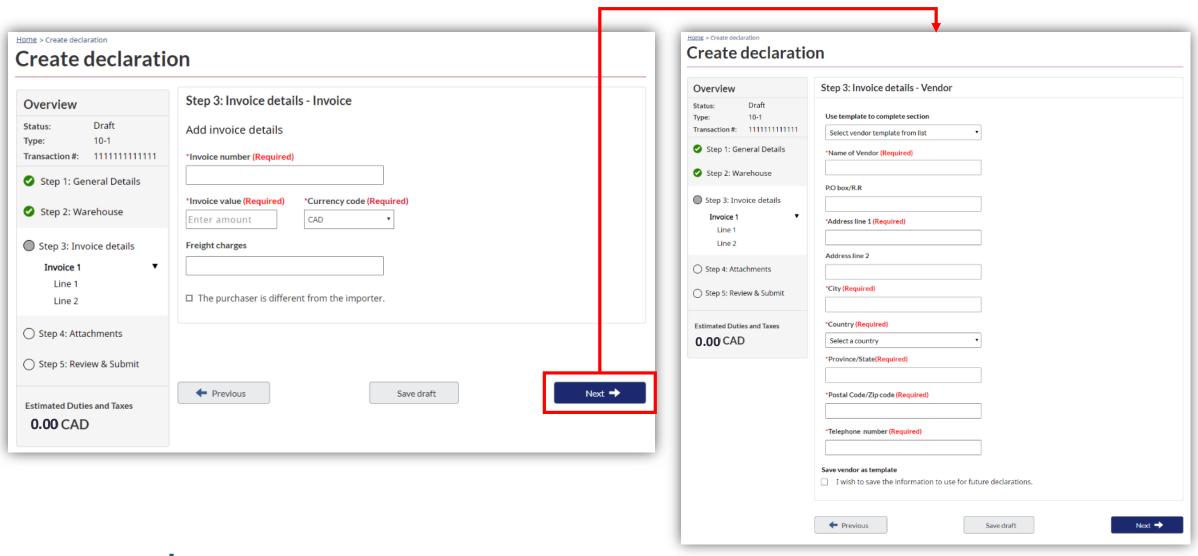


Creating a CAD (General details)



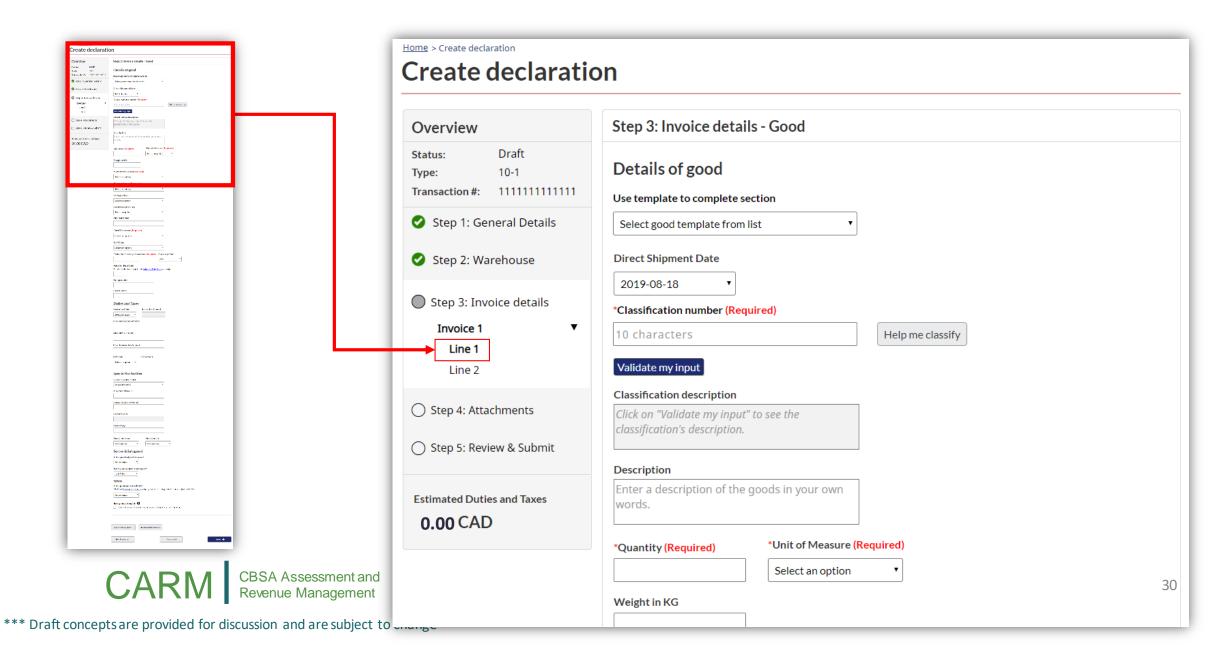


Creating a CAD (Invoice details - Invoice)

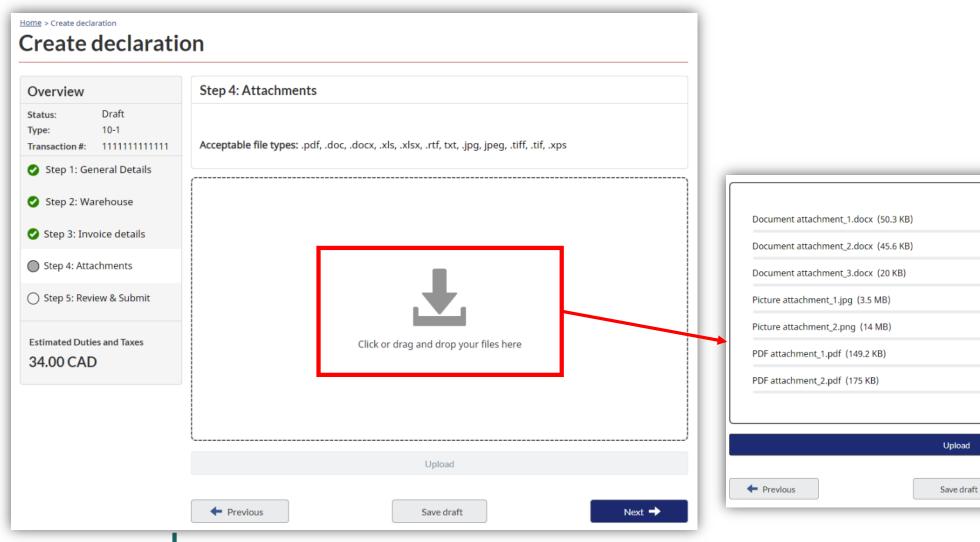




Creating a CAD (Invoice details - Goods)



Creating a CAD (Attaching files)



CARM

CBSA Assessment and Revenue Management

Next →

Certificate of Origin

Descriptive Literature

Advance Ruling

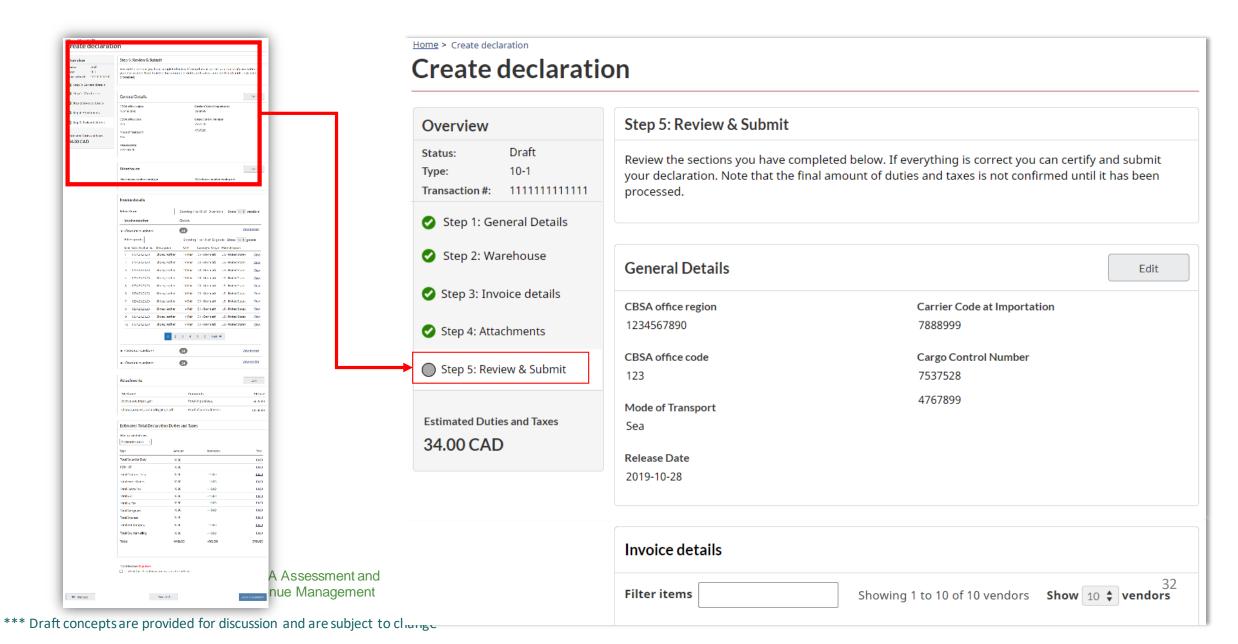
Proof of Payment

Commerical Invoice

Purchase Order

Credit Note

Creating a CAD (Reviewing before submitting)



Creating a CAD (Submitting and printing)

Status: Submitted

Declaration submitted

Type: 10-1 Transaction number: 56310000000241

Transaction number: 56310000000241 Form bundle no: 1918223637

Thank you for submitting your Customs Accounting Declaration (CAD). When your CAD has been processed you will receive a notification through the notification centre.

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Excise Tax	0.00		0.00	
GST	25,950.15		25,950.15	
Surtax	0.00		0.00	
Safeguard	0.00		0.00	
Antidumping	0.00		0.00	
Countervailing	0.00		0.00	
Interest	0.00		0.00	
Total	50,053.15		50,053.15	

Download and Print

Download a version of the declaration you have just submitted to print.



Back to list of declarations

Submission of Voluntary CAD CBSA Program Considerations

- The CBSA accepts voluntary entries only on an exceptional basis to encourage compliance.
- Voluntary entries present elements of risk to multiple CBSA programs. For this reason, the V-types have intentionally been kept as a paper process to allow for additional questioning by custom's officials at time of submission. This approach assists the Agency in identifying other potential compliance gaps within the commercial continuum.
- Despite these concerns, the CBSA has agreed to provide a portal-based solution, via the CARM Client Portal, that provides benefit to TCPs by enabling an electronic-based solution with improvements in automation while managing the risk to the CBSA.
- CBSA will monitor voluntary submission via CARM Client Portal to ensure compliance and may consider an EDI option in the future depending on trends or increased risks the CBSA may or may not find over time.



Additional questions?





Definition of Accounting Date





Submission of CAD for Goods Released on Minimum Documentation

Key Dates and Definitions

CAD Submission Deadline	Initial Acceptance of the CAD	Declaration	Correction Period	Adjustments
 The CAD must be submitted and pass validation within five (5) business days from the date of release based on EST/EDT CARM System time. The five (5) business day accounting timeframe is for HVS and LVS goods. The time period starts upon the date and time stamp of the release decision in ACROSS. The day of release is considered day zero. When goods are released on a Saturday, Sunday, or Federal Statutory holiday, the accounting period begins on the first business day after release. 	 Sets the payment due date and Date Interest Begins Triggers four-year Adjustment Period 	 Acceptance of the initial CAD is considered a 'draft' version of Accounting (determination under the Customs Act) The version of the CAD on file at 12:00:00am EST/EDT on the day after the payment due date according to CARM system time is considered the 'final' version of Accounting 	 From the initial acceptance of the CAD to 11:59:59pm EST/EDT on the payment due date according to CARM System time Changes are considered updates to the 'draft' version of Accounting (determinations under the Customs Act) 	 From 12:00:00am EST/EDT on the day after the payment due date according to CARM system time Changes are considered updates to the 'final' version of Accounting (redeterminations under the Customs Act)



CBSA Assessment and Revenue Management

Submission of CAD without Release (e.g. Voluntary) Key Dates and Definitions

Client Type	Initial Acceptance of the CAD	Declaration	Correction Period	Adjustments
RPP	 Sets the payment due date and Date Interest Begins Triggers four-year Adjustment Period 	 Acceptance of the initial CAD is considered a 'draft' version of Accounting (determination under the Customs Act) The version of the CAD on file at 12:00:00am EST/EDT on the day after the payment due date according to CARM system time is considered the 'final' version of Accounting 	 From the initial acceptance of the CAD to 11:59:59pm EST/EDT on the payment due date according to CARM System time Changes are considered updates to the 'draft' version of Accounting (determinations under the Customs Act) 	 From 12:00:00am EST/EDT on the day after the payment due date according to CARM system time Changes are considered updates to the 'final' version of Accounting (redeterminations under the Customs Act)
Non-RPP	 Payment is due immediately Sets Date Interest Begins Triggers four-year Adjustment Period 	 Acceptance of the initial CAD is considered the 'final' version of Accounting (determination under the Customs Act) 	• N/A	 All changes after the acceptance of the CAD will be treated as adjustments (re- determinations under the Customs Act)



Submission of CAD to Obtain Release

Key Dates and Definitions

Client Type	Release decision	Declaration	Correction Period	Adjustments
RPP	 Sets the payment due date and Date Interest Begins Triggers four-year Adjustment Period 	 The CAD posted as a result of the release decision is considered a 'draft' version of Accounting (determination under the Customs Act) The version of the CAD on file at 12:00:00am EST/EDT on the day after the payment due date according to CARM system time is considered the 'final' version of Accounting 	 From the release date to 11:59:59pm EST/EDT on the payment due date according to CARM System time Changes are considered updates to the 'draft' version of Accounting (determinations under the Customs Act) 	 From 12:00:00am EST/EDT on the day after the payment due date according to CARM system time Changes are considered updates to the 'final' version of Accounting (redeterminations under the Customs Act)
Non-RPP	 Payment is due immediately Sets Date Interest Begins Triggers four-year Adjustment Period 	 The CAD posted as a result of the release decision is considered the 'final' version of Accounting (determination under the Customs Act) 	• N/A	 All changes after release will be treated as adjustments (re- determinations under the Customs Act)



Additional questions?



Portal User Experience Sessions





Portal User Experience Sessions

Portal User Experience Sessions are guided sessions where participating TCP representatives will run through various Release 1 functionality scenarios on the CARM Client Portal, and provide feedback on the overall user experience

- Timeframe: targeting late October/early November 2020
- Participants will include a representative sample of TCP personas (e.g., Importers, Customs Brokers) focused on Release 1 functionality
- Onboarding sessions will be held in late September/early October to prepare participants for the user experience sessions

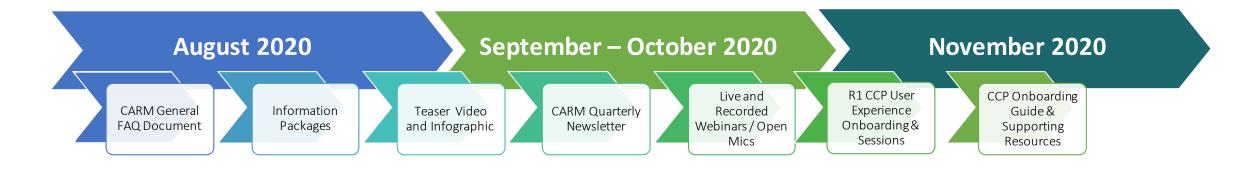


Communication and Engagement Update





Sequencing of Upcoming Communication and Engagement



Ongoing – Social Media, Stakeholder Events, Consultation Sessions



Timelines to be confirmed



Feedback on CARM Solution Spotlights

The CARM Solution Spotlights were shared with the TCP WG for feedback. The following key themes were identified and will be integrated in the next iteration of spotlight documents:

- Clarify language around who we mean when referring to "TCPs"
- Clearly identify which TCP members will be able to carry out actions (e.g. rulings)
- Apply consistent language throughout spotlight documents
- Provide examples to clarify scenarios
- Provide additional clarity on the delegation of authority roles/processes and financial security



Updated TCP WG Activity Calendar

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

Month	Activity	Date	Location
August	Consultation Session	August 26 (TBC)	Webinar
September	Consultation Session	September 23 (TBC)	Webinar
	Deep-Dive Session	September 30 (TBC)	Webinar

Note: The CARM team is working with the Sub-Working Group Leads to determine timing for upcoming SWG meetings.

Roundtable

Canada



Appendix





CARM API Queries: Background

During CARM Design CBSA considered both Push and Pull Options for Tariff data offered by CARM to TCPs:

- Push Service (Message Queue Based): Manage TCP connections to CBSA system(s), and provide data periodically to TCP EDI Message Queues as required based on business logic, and also support TCP queries for tariff data
- Pull Service (API/Web Service): TCPs manage CARM System connection in their system(s), and query data services periodically as required. As requested, CARM responds with only data which has changed since last execution date identified in request
- The "Pull API service" method was quickly determined to be the favoured solution by the CARM Team for many reasons including Simplicity, Modernization, Performance, and CBSA Architectural Direction
- Existing CADEX Queries (Tariff, Exchange Rate) and associated formats are to be sunset with the implementation of CARM, TCP system changes are required regardless of approach.

Approach and Rationale

Simplicity

- The API solution is public any TCP systems can connect at any time, and not just EDI partners
- This approach reduces complexity for CBSA (no need to manage TCP system connections and onboarding to message queues for Queries), and TCPs (ability to connect new systems and test systems easily)
- Does not require proprietary software/hardware/formats

Modernization

- API Services are a more modern approach to data transfer, especially for public data allowing TCPs to query at any time on any schedule, from any system
- The Tariff API has many advanced features available to ensure that the TCP systems can request data with precision, only providing data when required and as requested

Performance

• Providing data upon request in real-time minimizes processing time for both TCP systems and CARM

Architectural Direction

• The API solution aligns to direction provided by CBSA Enterprise Architecture, and aligns to Government of Canada Open Data (GC API) approach to providing data publicly, and is a best practice solution

Approach Comparison

Metric	Pull (API/Web Service)	Push (Message Queue)
Simplicity	✓ Public — available at all times to any TCP system	Subscription – TCP must first be onboarded for EDI services with CBSA
		Option would only be available to EDI Participants, for certified connections only
		CBSA must accommodate for endpoints that are no longer active or changing connections
	Requires TCPs to systematically schedule requests to ensure that updates are requested regularly	✓ TCP does not have to poll CBSA to inquire about the presence of changed data, it is pushed automatically
Performance	✓ Data is provided immediately upon request	Potential for significant lag time for TCP between data request and receipt
Modernization	 Provides provision for requesting only changed data for the timelines in the query 	Provides "full set" of data (complete or update) including data that may not be required
	 Aligns with GC API Open Data approach to public data 	
Direction	✓ Aligns to CBSA CARM architecture Team's direction, and to that of the Government of Canada	Does not align with CBSA Architecture Team's recommendations