

Trade Chain Partner Working Group (TCP WG)

DRAFT – FOR DISCUSSION PURPOSES ONLY

September 14, 2023



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Agenda

Topic	Speaker	Timing				
Opening Remarks	Mike Leahy	9:00AM – 9:10AM				
Release 2 Implementation	Darren Uchman	9:10AM – 9:40AM				
CES 2.0 Overview	Darren Uchman/ Margarita MacDonald	9:40AM – 10:50AM				
Break		10:50AM - 11:00AM				
Regulatory Package Update	Bethany MacLean	11:00AM – 12:00PM				
Lunch Break		12:00PM - 1:00PM				
CBW Customs Notice	Brad Jablonski	1:00PM – 1:15PM				
Financial Security Update	Valery Sina Ba/ Abderrahim Boussanni	1:15PM – 1:45PM				
Break		1:45PM - 2:00PM				
Industry Consultation	All	2:00PM – 2:45PM				
TCP Engagement & Readiness Update	Darren Uchman/ Kevin Horseman	2:45PM – 3:30PM				
Q&A / Conclusion	All / Mike Leahy	3:30PM – 4:00PM				
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Opening Remarks









Release 2 Implementation







CARM Release 2 Implementation Update

Good Afternoon,

Announcement from August 11th, 2023

The Canada Border Services Agency (CBSA) Assessment and Revenue Management (CARM) project is a significant undertaking by the CBSA and industry to modernize the collection of duties and taxes for goods imported into Canada. The initial phase of the project, launched in May 2021, allowed importers, brokers, and trade consultants to view their transactions and statements of account, request a ruling, and pay invoices with new electronic payment options.

Recognizing the investment and impact that CARM represents for industry and for the Government of Canada, we are taking a phased approach with it becoming the official system of record for the collection of duties and taxes for commercial goods imported into Canada.

In October 2023, the CARM Release 2 system will be available for selected industry partners who want to test their own internal systems, and for software service providers to continue to certify their software with CARM.

The <u>proposed regulatory amendments</u> continue on schedule with a planned coming-into-force date of May 2024, when CARM becomes the official system of record. Further enhancements are expected to become available in fall 2024. A forum will be established with key stakeholders to discuss implementation of this phased approach and application of regulations in support of CARM.

All commercial businesses who import goods into Canada need to register to the CARM Client Portal (CCP) before May 2024 to minimize border delays and benefit from the Release Prior to Payment (RPP) transition period.

Specifically, all importers who onboard the CCP prior to the coming-into-force date in May 2024 will be assigned RPP qualifying status for a 180 day transition period allowing them to adapt to this new model, while ensuring that border disruptions are mitigated. Commercial importers will still be able to obtain release prior to payment of duties and taxes during the transition period as they proceed to meet the requirement for financial security.

The CBSA is aware of the significant investment that CARM represents for industry and for the Government of Canada as a whole. Accordingly, we also wanted to take this opportunity to inform you that our intent is to publicly announce this latest CARM update via news release this week. At the same time, we will be posting more information on our website, which we encourage you to check out once available.

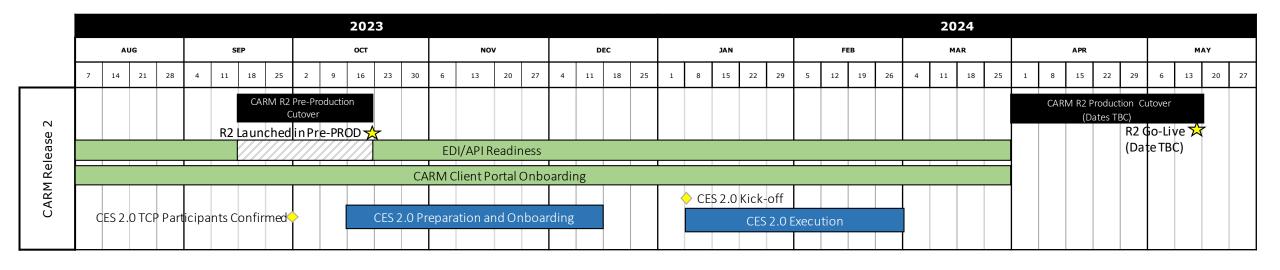
The Agency will continue to keep our Trade Chain Partners informed via communication through our working groups, webinars, so cial media, email distribution lists, and website.

Thank you for your continued engagement and support for CARM.

Sincerely,

CARM Engagement

CARM Release 2 Implementation Update





CES Closeout & CES 2.0 Overview

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CES Overview

The CARM Experience Simulation (CES) was introduced to the stakeholder community following formal Release 2 testing cycles (User Acceptance Testing and Regression Testing) to assess readiness. The purpose of the CES was to:

- Build confidence in the system and the associated process changes;
- Strengthen and inform R2 readiness;
- · Allow the user community to simulate real-world business processes; and,
- Expose and document process and system gaps and identify possible improvements.

The CES:

- Took place from February to June 2023 with participants assigned to specific phases (sprints).
- Included 73 representative Trade Chain Partners (TCPs) and 47 CBSA business user (Model Office) participants
- Successfully introduced participants to the CARM solution and its associated business processes and evaluated their readiness

Outcome:

- 60% of participants agreed that engaging in the CES increased their readiness, however, overall confidence using CARM averaged only 27% following participation in CES.
- CES participants would embrace another opportunity to participate in an exercise similar to CES provided the environment will reflect CARM R2 functionality and processes to be implemented in May 2024. (e.g. full support model, complete reference data and inclusive of more CARM R2 business processes)





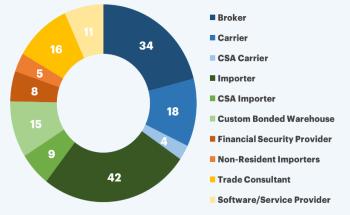
CES Metrics

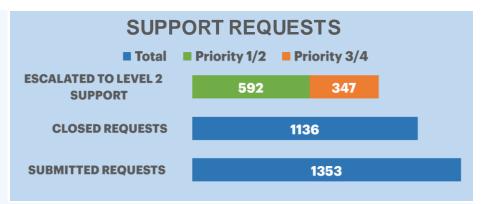






TCP PARTICIPANT BREAKDOWN*





TOP 3 PRIORITY 2 TICKET CATEGORIES





*Notes: 1. Some CES participants represented multiple roles (e.g. broker and importer) 2. Some participant groups were represented by brokers (e.g. broker conducting transactions on behalf of a client)



Scope

The below processes were in scope for CES. Activities were executed via the CARM Portal during Sprints 1 and 2 and through the CARM Portal, EDI and API channels during Sprints 3 and 4:

Process	Sprint 1	Sprint 2	Sprint 3	Sprint 4	Process	Sprint 1	Sprint 2	Sprint 3	Sprint 4
Sub program enrolment (RPP, Duties Relief, CSA)	х	x	x	x	Daily Notice, Statement of Account, Customs Brokers Summary Statement			Х	Х
CAD Types AB, C, V, CBW	Х	х	X	Х	Collections		X	X	Х
CAD Types TT, F		х	X	X	Offsetting		X	Х	Х
Corrections & Adjustments	Х	Х	X	X	Temporary Importations		X	X	Х
AMPS	Х	x	X	X	Drawbacks		X	Х	Х
Appeals (excluding ascertained forfeiture)	Х	Х	X	X	Appeals (including ascertained forfeiture)			Х	Х
Compliance	х	х	X	X	TAPD Analytics		X	Х	Х
Reporting	х	х	х	Х	Trade Risking				Х

The following activities were out of scope for CES due to system limitations (SL), outstanding policy decisions (P), or capacity to support (C):

- High volume transactions (SL)
- BN9 Registration and Program enrolment (SL)
- Email/mass notifications (SL)
- BN Changes where broker does not have delegation of authority for both businesses (P)
- CAD Cancellations (P)
- XML Drawbacks (P)
- Portal usability testing (C)



Measurement Results

A CES Measurement Plan was developed to track against the stated objectives. The sources of input included:

- CES Baseline and Closeout (Pre and Post) sprint surveys
- Analysis of CARM Client Support Unit (CCSU) tickets
- Items raised in regular touchpoints with TCPs
- Lessons Learned discussions

In Summary:

- CES was helpful in building participant readiness
- Overall confidence decreased for all stakeholders through participation in CES
- Participants were not able to successfully simulate all of high risk/complex business processes
- While training materials were helpful, participants identified key gaps and errors



CES Recommendations

Approach

- Develop a guided plan for external CARM clients (e.g. brokers, importers, financial security providers) that outlines transactional activities that can be simulated to help users get started in CARM.
- Clearly define objectives and communicate early and often.
- Require EDI certification/API onboarding to be completed before participation in any future CARM activities.
- Action unresolved system-related CES priority 2 tickets and provide an opportunity for participants to re-test.
- Group simulation activities based on processes.
- Provide a longer timeframe for participation.



CES Recommendations

Environment & Solution Experience

- Ensure sufficient server capacity for planned activities and volume of users.
- Implement a pre-production environment that can support CARM R2 processes. (e.g. include processes that were out of scope for CES).
- Ensure production reference data is available in the pre-production environment to the fullest extent possible and any gaps are documented and communicated.
- Integrate TCP feedback on process pain points to inform the prioritization of CARM enhancements.
- Analyze ECCRD feedback and update document.



CES Recommendations

Communication, Engagement and Support

- Implement a more robust CBSA-wide support model with service levels established for all areas.
- Establish a separate, direct support path for users when connectivity is lost or profiles are disrupted.
- Provide topic-specific Q&A sessions with subject matter experts.
- Analyze and incorporate CES feedback into communication materials.

The outcomes and feedback from CES have informed the proposed CES 2.0 way forward approach outlined on the subsequent slides



Way Forward – CES 2.0



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CES 2.0 Context & Objectives

Context

- CARM R2 functionality will be hosted in a pre-production environment between October 2023 and May 2024
- CES 2.0 will strengthen and inform internal and external stakeholder readiness in advance of CARM becoming the system of record
- Establish and clearly articulate objectives and expectations to enable activity and resource planning for TCPs

Purpose

To increase readiness with R2 functionality in advance of CARM becoming the system of record in May 2024

Objectives

- The approach will aim to achieve the following TCP objectives:
 - 1. Increase user knowledge and simulate real-world business processes;
 - 2. Transition to the R2 managed services model to provide enhanced support;
 - 3. Allow TCPs to confirm core business functions in a CARM environment.



CES 2.0 Structure and Approach

Sprint 0	• October 16, 2023 to December 15, 2023*
	 Approximately 80 internal CBSA stakeholders to adjust developed workarounds and familiarize themselves with the product, 2 tiers of CBSA participants:
	 Model Office (HQ, OPI group); and Regional broader participation TCPs complete their EDI and API certification/onboarding activities "Dry Run" with a single TCP to confirm environment access, duties and taxes calculations, reference data and various business scenarios Implement enhancements/ system improvements prior to January
Sprint 1	 January 2024 to March 2024* Approximately 40 TCPs (focus on CES Sprint 4 participants and small/medium sized importers from Sprint 1) Execution of CBSA/TCP business scenario activities Mix of structured and unstructured business scenario testing Allow for focused discussion and testing on business lines (e.g. SIMA, TT, Adjustments, etc.)

^{*} Confirming Sprint 0 and 1 dates

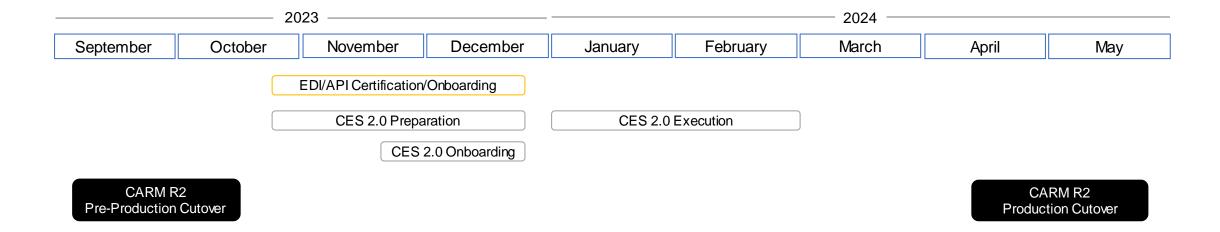
Rationale for Approach

The two phased approach (Sprint 0 and Sprint 1) incorporates lessons learned from CES 1.0 and will allow CBSA to:

- Mobilize internal users before engaging with TCPs:
 - Increase user familiarity with system functionality to refine workaround activities
 - Identify and address gaps in job to role mapping
- Provide additional time for service/software providers to complete certification activities before Sprint 1 while engaging TCPs outside of their peak period for CES activities
- Work with a single TCP to validate the environment during a dry-run phase
- Manage service levels by limiting the number of participants to action and resolve incidents based on prioritization and established service level agreements
- Clearly articulate objectives, limitations and future system enhancements, including anticipated benefits for participating TCPs
- Broaden scope to include de-scoped processes from CES (e.g. large volume of transactions, CAD Cancellations, BN changes, internal mass adjustments and drawback functionality)
- Integrate OGD processes and activities
- Include structured business scenarios (e.g. SIMA, CSA) along with unstructured scenarios for participants



CES 2.0 Draft Timelines



Next Steps

September

Reach out to TCPs to confirm interest in CES 2.0

October

• Gather onboarding information to support preparation activities

November / December

- Hold a TCP General Information session
- Onboard CES 2.0 participants



Break - Return 11:00am







Regulatory Package Update







CARM Regulatory Amendments and New Regulations

Regulatory amendments are being proposed to 12 regulations in support of the implementation of CARM Release 2 (R2). These amendments are intended to:

- support electronic communication between the CBSA and Trade Chain Partners (TCPs);
- update financial security requirements;
- implement harmonized billing cycles to provide more consistency among billing, accounting and payment due dates for imported goods; and,
- update outdated references and terminology in regulation.

New regulations, the *Financial Security (Electronic Means) Regulations*, are also being proposed to set out the terms and conditions for how financial security will be administered when it is required by TCPs to participate in select CBSA programs.

Pre-publication of the CARM Regulations

- From November 26, 2022 to January 10, 2023, the CBSA invited interested parties to share their views about proposed regulatory amendments and new regulations that are needed to fully implement the CARM initiative.
- In total, 18 individuals submitted feedback, either as a representative of a company, an industry body, or in anonymity.
- The following key themes emerged in the comments received by respondents through the consultation process:
 - Digitalization
 - Implementation
 - Financial security and payment methods
 - System-specific comments



What we Heard: Digitalization

- 1. Support of electronic methods for accounting and payment
- 2. Need for contingency plans in the event of system outages
 - The regulatory proposal includes amendments to allow for non-electronic accounting methods in limited circumstances, such as system outages.
 - The CBSA will communicate contingency plans leading up to R2 implementation in May 2024.
- 3. Importance of client support for TCPs in rural and remote communities, as well as small and medium-sized businesses
 - The CARM Client Support Helpdesk that was established at CARM Release 1 in May 2021 is expanding its capacity to assist TCPs to enroll in and make use of the CARM client portal.
 - Information about CARM implementation will continue to be communicated to TCPs to provide education and awareness in advance of R2.

What we Heard: Implementation

- 1. Mixed views on the duration of the transition period to allow importers to obtain financial security in order to have their goods released prior to the payment of duties and taxes
 - The CBSA intends to maintain the 180-day transition period to give importers time to obtain financial security to obtain release prior to payment while managing the financial risk to the Agency.
- 2. Concerns related to industry and CBSA readiness for R2, including suggestions for delayed transition to CARM for certain TCPs (e.g. those who import through the Courier Low-Value Shipment or postal streams)
 - The CBSA continues to monitor both CBSA and TCP readiness for R2 and explore options to address the concerns of the express carrier community.



What we Heard: Financial Security and Payment Methods

- 1. Requests for clarification with respect to who holds an obligation under the regulations (the debtor or the financial security provider) and when that obligation begins
 - The CBSA has reviewed this feedback to determine whether amendments to the regulations should be proposed.
- 2. Concerns related to the calculation method to determine the required amount of financial security required to obtain RPP, specifically the inclusion of GST in this formula
 - While not related to the regulations, the calculation of the financial security requirements was done prior to the start of the CARM system design, with consultation from key representatives of the TCP community.
 - The decision to include GST in the calculation formula is intended to secure an important tax revenue that is not currently secured and will better represent the total debts owed to the Crown.



What we Heard: Financial Security and Payment Methods (Cont.)

- 3. Concerns surrounding the move to require importers to obtain their own financial security rather than relying on their broker's bond to obtain RPP
 - The use of broker bonds for RPP presents challenges for the CBSA to appropriately mitigate risks to Crown revenue, and has unintended consequences for importers and for the flow of goods crossing the border.
 - Importers will continue to be able to delegate brokers to manage their import-related processes in CARM, other than offering financial security.
- 4. Inquiries on what payment methods are available in CARM for non-resident importers (NRIs)
 - The CBSA is currently onboarding new US and international financial institutions and evaluating additional electronic payment methods.
 - NRIs can consult with their financial institution to find out if they can make electronic payments to the CBSA or may continue to remit payment using a customs broker.



What we Heard: System-Specific Comments

- 1. Desire for brokers to be able to run queries/searches in CARM to confirm if:
 - their importer client is registered for an account on the CARM client portal and has posted sufficient financial security to obtain RPP; and,
 - they have been delegated access to the importer's account on the CARM client portal
- 2. Desire to be able to make amendments to the importer of record after accounting has been submitted in CARM

The CBSA is reviewing all feedback related to CARM system functionality and operational procedures to assess if any enhancements are possible for R2 or as part of future updates.

Timeline

- The intention is to publish the final regulations in the *Canada Gazette*, Part II in advance of R2 to allow time for TCPs to view and understand their new regulatory requirements.
- The proposed regulatory amendments and new regulations are scheduled to come into force in **May 2024**, when CARM becomes the official system of record for the collection of duties and taxes for commercial goods imported into Canada.

Additional Information

- What we heard report: Proposed regulatory amendments to support the implementation of CBSA Assessment and Revenue Management (CARM).
- <u>Canada Gazette, Part I, Volume 156, Number 48: Regulations Amending Certain Regulations Administered and Enforced by the Canada Border Services Agency.</u>
- Canada Gazette, Part I, Volume 156, Number 48: Financial Security (Electronic Means) Regulations.

If you have any questions or concerns related to the CARM regulations, please reach out to us by email at: CBSA.OCT/CECO.ASFC@cbsa-asfc.gc.ca.



Break – Return 1:00pm









Customs Bonded Warehouse Customs Notice

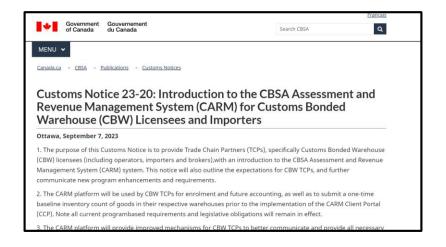


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Customs Notice is Available Online



Read the full notice here:

<u>Customs Notice 23-20: Introduction to the CBSA Assessment and Revenue Management System</u> (CARM) for Customs Bonded Warehouse (CBW) Licensees and Importers (cbsa-asfc.gc.ca)



Financial Security Update



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Terminology

Written Security Agreement

Example: Customs Bond

Letters of credit are under consideration for future acceptance as a form of security, formal decision is underway

Term used in Policy documents: Customs Bond

Term used in CARM: Non-Cash Bond



Terminology (con't)

Deposit

A payment made electronically by the importer in CARM in order to provide a financial security

Term used in Policy documents: Cash Security

Term used in CARM: Cash Bond

Terminology (con't)

Other forms

- Only in exceptional circumstances, the legacy forms below may be accepted:
 - Certified Cheques or Money Order
 - Paper bond
- Not supported by the core functionalities of the CARM solution and would require a manual processing
- Additional information will be made available

D-Memorandums

D-Memos: A new D-Memo (D17-5-2) will be issued for RPP program and the current D-Memo (D1-7-1) will be updated for CARM R2 in accordance with the amended Regulation "Financial Security (Electronic Means) Regulations"

- D17-5-2: administer the policies and procedures around the financial security related to RPP. Will
 provides the new requirements and directives in effect at CARM R2.
- D1-7-1: will include the policy changes in effect at CARM R2, particularly those related to the
 automation of the financial security processes, the accepted forms of financial security as well as the
 accepted security providers.

Q&A regarding paper bonds

Question	Response
Can the Security Provider modify or cancel a paper bond once it's converted into electronic bond in CARM?	The paper bonds are converted into CARM in order to update the financial security coverage for the importer's account. However, the signed copy of the D120 form held by the CBSA will continue to be the binding bond that was submitted by the security provider. Therefore, any modification to the bond should be done via endorsement/riders. Alternatively, the converted paper bond can be cancelled and replaced by a new electronic bond via API.
Will the security providers be able to view the converted paper bond in the CARM client portal?	Yes, the security providers, who are enrolled in the "Third Party – Surety Providers" program in CARM, will be able to view the list of all bonds that are linked to their business number (BN9) including the converted paper bonds.
If the paper bond limit is inadequately high and needs to be decreased. What is the mechanism of decreasing the paper bond?	The importer can submit a request via the <u>Client support contact form</u> . The CBSA will review the request and may require further information and supporting documentation from the importer to make a decision.
How the paper bond be calculated in the total coverage?	The coverage will double the value of the paper bond (similarly to the electronic bond)



Industry Consultation







TCP Engagement & Readiness Update









TCP Engagement Update

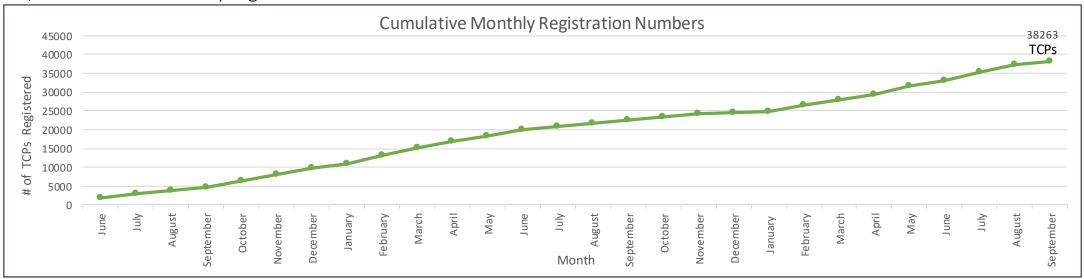






Trade Chain Partner Portal Onboarding Status

38,263 TCPs are currently registered



Registration Numbers								
		Last 2 weeks (August 23rd to September 5th)	Prior 2 weeks (August 9th to August 22nd)	Month over Month				Takal
				June	July	August	September	Total
	All TCPs	976	1150	2004	1901	2457	217	38,263
Brokers	All Brokers	1	0	0	0	1	0	272
	All Importers	975	1150	2004	1901	2456	217	37,991
	Top 3000 Importers (value)	26	33	117	65	88	5	2342
Importers	Top 3000 Importers (volume)	40	33	97	65	67	4	2301
	CSA Importers	0	0	1	1	0	0	101
	Top 2150 C-Type Importers	9	15	32	20	29	5	304

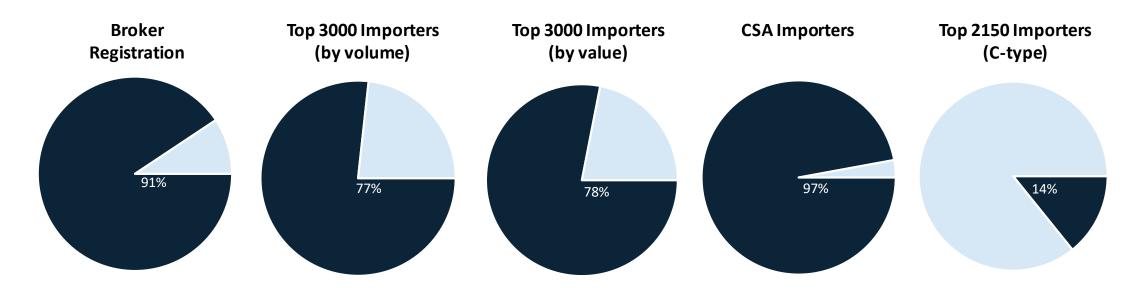
[•] Top 3000 Importers (volume) make up \sim 80% of Total Importer Volume. Top 3000 Importers (value) make up \sim 80% of Total Importer A/R.

• CSA Importers account for 35% of Total Importer A/R. Top 2150 C-Type Importers transact at least once per month on average.

Updated September 6th, 2023



Trade Chain Partner Portal Onboarding Status



Highlights

- August had the highest number of registrations per month since Release 1, with over 2450 TCPs registering to the CARM Client Portal.
- New webinar schedule for Fall 2023 will be released shortly. Importers continue to attend webinars in large numbers to learn about the onboarding steps and how to prepare for Release 2.

Updated September 6th, 2023



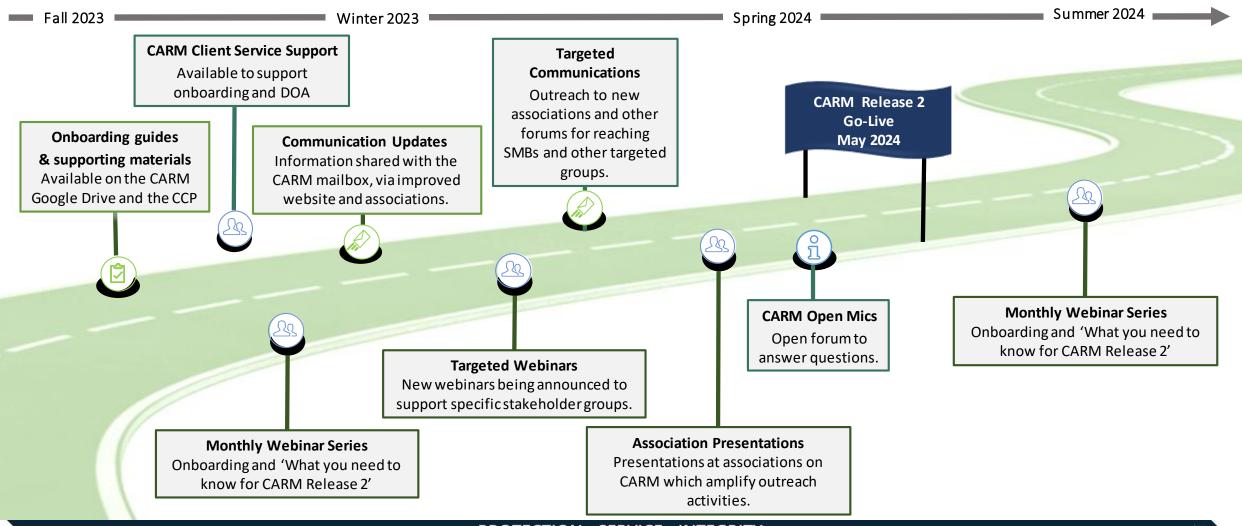
CCP Onboarding Targets (updated)

CCP onboarding is being monitored and outreach is being adjusted to raise awareness with sub-stakeholder groups





TCP Engagement





Raising Awareness with Small / Medium Importers

Landscape

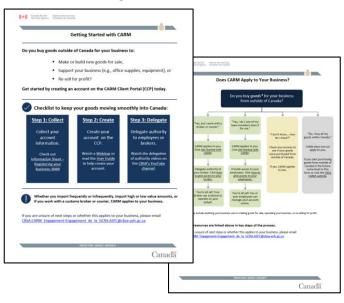
- Small and Medium sized importers represent the largest client group
- ~85,000 clients transact in a given month

Target

85,000 total Importers onboarded by April 1, 2024

Engagement Approach and Activities

- TCP Associations and GoC Partners: Communication and 1-pagers for associations and online information distribution (e.g. CRA)
- **POE Material:** Display CARM Awareness Poster and provide CARM Handouts at Ports of Entry (Refreshed versions in ~ Oct)
- E-Longroom Messaging: Include attachment or CARM signature block in E-Longroom correspondence to C-type Importers
- CFIB and Chamber of Commerce Outreach: Engage small and medium enterprises through CFIB & Chamber of Commerce activities (webinars, awareness toolkits, etc.)
- CBSA Website & Social Media: Updating CBSA Website to highlight CARM and clearly direct TCPs to content and materials, greater
 presence on CBSA social media





CARM Awareness POE Materials

To raise awareness:

- To raise awareness directly at the Ports of Entry with C-Type clients and all clients.
- Posters and hand-outs were originally distributed in the Spring 2023. A refreshed version will be at POEs (~October) that includes May 2024.



CARM Hand out

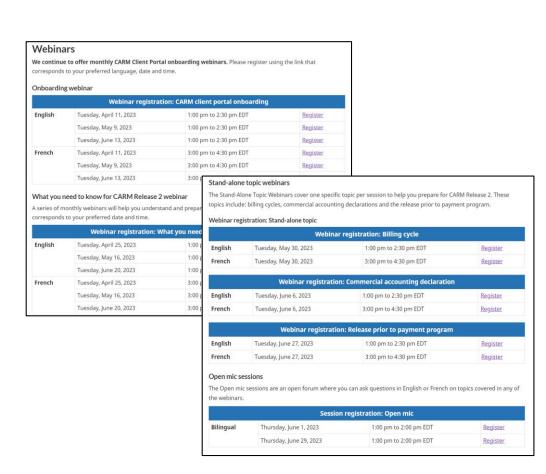


CARM Poster



Webinars will be continue monthly leading up to May 2024

- Onboarding and What You Need to Know With CARM Release 2 Webinars will continue monthly.
 - Registration and attendance continues to be strong
 - With increased Onboarding Webinars close to go-live
- New targeted webinars will be available to target specific stakeholder groups.
 - Registration information will be available on the website and shared with this group.
- New dates being announced soon. Webinar schedule and registration links can be found on the <u>CARM Client Portal</u>.





TCP Readiness Update





Week 14 - 09/01/2023 - CAD EDI/API TCP Readiness

CBSA's CAD readiness target is to facilitate the readiness of 100% of software providers which currently submit B3 transactions electronically. Readiness will be measured by TCPs self-confirming that their software and connection points were successfully tested to submit CADs electronically with CARM R2.

TCP TESTING STATUS	
20 Software packages	Represents 90 % of transaction volumes* or \$36.9B D&Ts*
39 unique TCPs onboarded	24 EDI / 31 API
16 unique TCPs actively testing	Represents 40% Transaction Volumes*

TCP SELF-SUBMITTED SCENARIO PROGRESS		
# of scenarios completed	11%	
# of scenarios in-progress	7%	
# of scenarios not started	82%	

Note: Numbers reflective of information provided by TCPs and may not be accurate as there have been challenge in obtaining timely information.

TCP READINESS STATUS		
Software packages confirmed "ready"	1	
% of Duties and Taxes	2.16%	
% of Transaction volumes	0.55%	

Week 14 - 09/01/2023 - DN/SOA/CBSS EDI/API TCP Readiness

CBSA's CAD readiness target is to facilitate the readiness of 100% of software providers which currently submit B3 transactions electronically. Readiness will be measured by TCPs self-confirming that their software and connection points were successfully tested to submit CADs electronically with CARM R2.

TCP TESTING STATUS		
20 Software packages; represents 87 % of ARL profiles		
38 unique TCPs onboarded		
16 unique TCPs actively testing		

TCP SELF-SUBMITTED SCENARIO PROGRESS		
# of scenarios completed	11%	
# of scenarios in-progress	7%	
# of scenarios not started	82%	

Note: Numbers reflective of information provided by TCPs and may not be accurate as there have been challenge in obtaining timely information.

TCP READINESS STATUS

Software packages confirmed "ready"

0/0%

Week 1 – 09/01/2023 – Bond API TCP Readiness

CBSA's Bond API readiness target is to facilitate the readiness of 100% of Security Providers/companies which currently submit security agreements (bonds) electronically. Readiness will be measured by Security Providers/companies self-confirming that their software and connection points were successfully tested to submit security agreements (bonds) electronically with CARM R2.

API Bond TCP TESTING STATUS

- 28 Security Providers/companies have expressed interest in the API Bond testing; 5 one-on-one sessions held; 9 scheduled/to be held
- 2 Security Providers/companies have confirmed that they will use the CARM Client Portal and will not be building software to support the API Bond
- 0 Security Providers/companies actively testing (clients plan to begin testing when the test environment becomes available in October)

TCP READINESS STATUS

Security Providers confirmed "ready" 0



Question and Answer Period









Thank You!

For more information:

- Visit the CARM section of the CBSA website
- Visit the <u>CARM Client Portal</u>
- Visit the <u>CARM Google Drive</u> for resources
- Join the <u>CARM LinkedIn Group</u> for the latest news
- Questions? Email:
 <u>CBSA.CARM_Engagement-Engagement_de_la_GCRA.ASFC@cbsa-asfc.gc.ca</u>
- Join the email distribution list by emailing CBSA.CARM_Engagement-Engagement_de_la_GCRA.ASFC@cbsa-asfc.gc.ca



