Single Window Q & A   **Available October 2015**

Please find the Canada Border Services Agency CBSA responses, in red.

1. We had understood that using the IID from the onset would allow more than 999 lines to be transmitted. However, it was stated in the webinar that the 999 line limitation will apply when using the IID at first and may not change until a later deployment. Can you provide details?

Response: The SWI data model has been developed to accommodate 9,999 lines.
Although the IID supports more levels and lines of information than previous release transactions, clients who submit accounting data by way of EDI using the CBSA's Customs Automated Data Exchange (CADEX) system will still need to consider the capacity limitations of the CADEX system when constructing IIDs. As a result, a TCP must ensure that no invoice contains more than 999 overall lines.

2. Rather than limiting the number of characters in a Unique Reference Number (URN) to 14, the same as in a transaction number, we had discussed allowing a maximum of 25 characters. The reason for this was to avoid confusion between a URN and a transaction number. Has a decision been made whether the number of characters used can be increased?

Response: A change request has been initiated and is currently undergoing an impact analysis. Once a decision has been made, we will communicate the information to the CSCB.

3. We had had discussions regarding whether the party uploading an image required account security. This issue has not been resolved and we understood that CBSA was having internal discussion on this issue. What is the status of those discussions?

Response: Internal discussions are still ongoing.

4. Today we only have one cargo control number per entry. We have non-resident importers that bring in multi-piece commercial shipments that have a lead shipment number and one CN and one transaction number. The entire entry is cleared under the NRI's business number. However, there are multiple delivery parties (DP), each with a "child" shipment number.
   a.   With SWI-IID, will each child shipment be required to be set up with their own CN or can we continue with status quo?
   Response: There will not be a requirement for a separate Cargo Control Number or Carrier Number.
   b.   How should this scenario be handled with SWI-IID?
   Response: Some PGAs require that the multiple delivery parties information be provided. CFIA is an example of that requirement. Please refer to the CFIA Appendix B.1 of the ECCRD, and various addendums for further details on how to report multiple delivery parties.
   c.   Can we just supply the delivery addresses and the unique invoice numbers per DP in multiple SG17 loops without providing CN/DP?

5. We understand that the SWI-IID is a release request and that if sent by the mode specific deadline it will also fulfill the ATD requirements. If we don't have all of the data needed to send the IID before the goods arrive, the IID can be sent after arrival. However, the ATD is required to be sent prior to arrival. What happens when ATD is not sent within the allowed time frames? Is the release request held for a period of time until the ATD is filed?

CBSA Programs Response: This level of design and process flow has not been fully developed to this level of detail. However, it is anticipated in such scenarios and following actions required in order to address the non-compliance (i.e., failure to provide pre-arrival ATD within mode-specific timeframes), release requests submitted post-arrival in the absence of ATD will then be processed accordingly.

6. According to the ATD ECCRD, non-commercial (ie personal/residential/casual) goods do not require ATD. However, in the current version, brokers are not provided with an ATD Exception code to indicate the entry is casual. The broker is more likely than the carrier to know if an entry is casual so could CBSA consider adding an A6 exception for this purpose for the broker's use?

CBSA Programs Response: The current design for ATD includes the ability for a client (e.g., importer, broker) to send an "ATD Exception" transmission. This transmission would contain only 3 data elements - the importer's BN, the cargo control number of the shipment and the applicable exception code indicating reason why full ATD is not required (e.g., personal goods/casual goods, etc.).

7. If you have an invoice over 999 lines, what are the options available to handle these in the IID? In the Accounting Considerations 1.11 section of the ECCRD, it appears there are a couple of options: If these are options (see bullets below), we feel we need more specifics rules that can be used in our programming.

- *Construct their IIDs such that no invoice contains more than 999 overall lines; and/or;* …Does this mean we are allowed to create multiple invoices from one invoice that are greater than 999 lines? If it is allowed, what should be the logic for invoice/PO number, weight and quantity?

Response: An invoice number can be the same on two separate invoices. Split an invoice with more than 999 lines into two separate invoices if necessary.

- *Construct their IIDs such that all lines for identical HS codes are grouped by invoice pages, to allow the combination of these lines on the B3. This would allow the transmission of a value of 0 for the Invoice Line Number as per p43 of the CADEX PRD 2013.* Is this stating we should try to have our system group invoice lines together that are on the same invoice page that have the same HS together into one line; or is it stating we can group lines from any of the invoices pages with the same HS on a specific page as one line? If the manufacturer changes for any of the identical HS lines, we would still need to create a new line; correct?

Response: Here are a couple of options:

1. To help break up an invoice, group commodities with the same manufacturer and/or country of origin and/or packaging at the GAGI level.
2. If the manufacturer is different for any identical HS lines, these lines should be split into their own commodity line and or GAGI group.
3. If the PGA does not require manufacturer as a mandatory element, the TCP could then provide all identical HS codes on one line. However, If the identical HS lines are from different origins or are packaged separately, they should be identified on separate lines. For example:

HS - 1234567890 has two separate manufacturers (MANU "A" & MANU "B")
HS – 1234567890 originates from two separate country's (COO "A" & COO "B")

GAGI 1
GAGI Country of origin = COO "A"
GAGI Manufacturer = MANU "A"
Commodity 1 = HS 1234567890

GAGI 2
GAGI Country of origin = COO "B"
GAGI Manufacturer = MANU "B"
Commodity 1 = HS 1234567890

Or

GAGI 1
GAGI Country of origin = COO "A"

Commodity 1 = HS 1234567890
Commodity 1 Manufacturer = MANU "A"
Commodity 1 Country of Origin = N/A

Commodity 2 = HS 1234567890
Commodity 2 Manufacturer = MANU "B"
Commodity 2 Country of Origin = COO "B"

Or

GAGI 1
GAGI Manufacturer = MANU "A"

Commodity 1 = HS 1234567890
Commodity 1 Manufacturer = N/A
Commodity 1 Country of Origin = COO "A"

Commodity 2 = HS 1234567890
Commodity 2 Manufacturer = MANU "B"
Commodity 2 Country of Origin = COO "B"

8. Currently, if an incorrect container number is noted on a release request associated with warehoused goods, the goods will be released by CBSA but the warehouse will not release the goods to the carrier until an RMD corrector is filed in order to indicate the correct container number. Will this continue to be the practice with IID?

Response: The container number is not a data element in the IID. As such, the container number will not be shared with the warehouse operator.

9. SG117 – CNT & MEA – What can be done if the quantity of the commodity is not a whole number and the commodity size is in an area? What MEA attribute code do we use when area (ie square feet, etc.) is used for the commodity size on the invoice and the HS also requires this (ie. MTK)? Can we use a volume attribute code (ie. BRI – Unit Volume), or would we have to request weight information for the commodity from the supplier when the quantities are in area (ie. square feet) and are not whole number.

Response: SG117.MEA supports up to 4 decimal places as well as UOM code "FTK" (Square Foot). It is always recommended to use the UOM associated to the tariff provided, to accurately align with the B3 information. In the example provided above, "MTK" is also supported by SG117.MEA.

10. Please clarify SG101 LIN (GAGI grouping). Does this mean we group item lines that are regulated by the same Government Agency program that are from the same manufacturer? Can we group the item lines by manufacturer? By origin? By packaging?

Response: SG101 LIN is designed to allow the importer/broker to group a number of commodities by manufacturer and/or by country of origin and/or packaging. The items do not necessarily need to be grouped by the same regulating agency (some items may be regulated by more than one Agency).

Can we group by origin or packaging at the GAGI level when the manufacturer is not required by the PGA? Or do we need a common denominator such as manufacturer/vendor in order for the lines to be grouped at the GAGI level. Does the origin and packages affect the IID at the GAGI level and how so?

Response: You may group by origin or packaging at the GAGI level when the manufacturer is not required by the PGA. The Vendor is to be provided at the invoice level and must be associated to the groups of items (GAGI) and the commodities provided at the line level.

Country of Origin provided at the GAGI level is to identify the origin of the group of commodities. If a different country of origin is applicable to an individual commodity, this would be provided at the commodity line level (SG118.LOC). The origin provided for this commodity line level would "override" the origin provided at the GAGI level. Similarly for packaging, the packaging provided at the GAGI level describes the packaging of the group of commodities (i.e. box, skid). The packaging provided at the commodity level (SG127.PAC) would provide the detailed packaging of the commodity itself (i.e. the consumer packaging).