

Trade Chain Partner Working Group (TCP WG)

DRAFT – FOR DISCUSSION PURPOSES ONLY

March 27, 2024

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Agenda

Торіс	Speaker	Timing	
Welcome – Meeting Login	n/a	10:00 AM – 10:05 AM	
Opening Remarks	Mike Leahy	10:05 AM – 10:10 AM	
Customs Notices - TAPD	Charles Melchers	10:10 AM – 10:30 AM	
Cutover Period	Richard Lavoie	10:30 AM – 11:00 AM	
Transition Period Update	Kerri-Anne Whittaker	11:00 AM – 11:30 AM	
Update on RPP – Minimum Security	Valéry Sina Ba	11:30 AM – 11:45 AM	
CES 2.0 Close-out	Kerri-Anne Whittaker	11:45 AM – 12:05 AM	
EDI Certification Update	Christian Figueredo	12:05 PM – 12:20 PM	
Industry Feedback	All	12:20 PM – 12:45 PM	
Closing Remarks	Mike Leahy	12:45 PM – 1:00 PM	

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Opening Remarks

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Customs Notices

Trade and Anti-dumping Programs

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3 New Customs Notices to be Published

- 1. Termination of the Temporary electronic procedures for Canada Border Services Agency's Trade Programs (COVID-19) GTA Pilot
- 2. Submission and Processing Single and Blanket B2 Adjustments or Voluntary Disclosure requests on or after April 1, 2024
- CARM Administrative Measures related to the Duties Relief Program, Duty Drawback Program and Commercial Temporary Importations under Tariff Item No. 9993.00.00



1. Termination of the temporary electronic procedures for CBSA's Trade Programs (COVID-19) – GTA Pilot

- Termination of the B2 Pilot Project in the GTA Region as of March 31, 2024 (EOD).
- Any electronic submissions (Single and Blanket B2s or VDPs) received on or after April 1, 2024 will not be accepted or processed.
- Pilot project is not accepting new participants.
- Current participants will have until March 31, 2024, to make submissions.



- 2. Submission and Processing Single and Blanket B2 Adjustments or Voluntary Disclosure Requests on or after April 1, 2024
- Single and Blanket B2s or VDP requests submitted between April 1 and May 12 are unlikely to be processed before R2 go live (May 13, 2024).

Clients are strongly advised to wait until May 13, 2024.

- After go live, TCPs can submit adjustments as pre-CARM "as declared" CADs, followed by an adjustment. This also applies to DRP diversion declarations.
- Exceptions:
 - Paper submissions will be accepted if the transaction is close to its legislative time limits.
 - SIMA requests
 - Appeals under s.60



3. CARM Administrative Measures related to the Duties Relief Program (DRP), Duty Drawback Program and Commercial Temporary Importations under Tariff Item No. 9993.00.00

- The current process for DRPs, Drawback claims and commercial temporary importations will continue until May 12, 2024.
- Please refrain from submitting **DRP diversion declarations** between April 26 and May 12, 2024.
- Any valid Temporary Imports Permits on a Form E29B for commercial goods accepted by CBSA prior to May 13, 2024 will remain valid until the goods leave Canada and/or the permit expires.



3. CARM Administrative Measures related to the Duties Relief Program (DRP), Duty Drawback Program and Commercial Temporary Importations under Tariff Item No. 9993.00.00 (continued)

After CARM go live (May 13, 2024), TCPs will be able to use the CARM Client Portal to:

- Submit K90 applications to enrol in the DRP.
- Report DRP diversions using CARM's Mass Adjustment process (pre-CARM Type F CADs).
- Submit Drawback claims for both B3 and CAD transactions using the "Pre-CARM Drawback Request" process.
- Place Temporary Admission Permit requests under tariff item 9993.00.00 using the new Form BSF865.

Cutover Period

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The Cutover Period to CARM – What TCPs need to know (1 of 7)

What is the Cutover Period?

• The Cutover Period is the period of time required for CBSA to migrate existing systems and functionality to CARM systems and functionality for the May 13th go-live date.

How long will Cutover Period last?

• From April 26th to May 13th



During the Cutover period, progress updates on Cutover activities will be communicated to Trade Chain Partners



The Cutover Period to CARM – What TCPs need to know (2 of 7)

Can I still release goods during the Cutover Period?

- Yes, release processing is available throughout the Cutover Period
 - Release processing is not impacted and remains available with the exception of a maintenance window that will extend from the evening of Saturday, April 27th to the morning of Sunday, April 28th (hours to be confirmed)
- During the Cutover Period, existing RPP privileges remain in place (e.g. broker RPP bonds)
- *** The guiding principle is to maintain border fluidity and limit border disruptions

Until when can TCPs submit RPP applications before cutover?

- The CBSA will accept paper RPP applications until April 1, 2024 to allow time for manual processing before the cutover
- The CBSA is unable to guarantee applications will be processed in time for go-live if received after April 1, 2024
- Recommend clients wait until after go-live to enrol electronically as this may be a faster option for importers

How can I receive my release notification during the Cutover Period?

- As CADEX is retired, Importers and Brokers relying solely on this system to obtain Release Notifications will need to look into alternate ways of obtaining the information
- Most importers and brokers are also using the Release Notification System (RNS) which will continue to transmit messages during and post cutover.
- Post May 13th go-live, query using API and information on the CCP will also be available for this purpose



The Cutover Period to CARM – What TCPs need to know (3 of 7)

Can I submit my accounting documents during cutover?

- The submission of electronic accounting documents <u>must be paused</u> until CARM functionality and the Commercial Accounting Declaration (CAD) is available on May 13th
- TCPs can present B3 C-Type accounting documents during the Cutover Period
 - Customs Commercial Entry Processing System (CCEPS) terminals and printers will remain available during the Cutover Period to create C-Type B3s at Ports of Entry (POEs) and Commercial Offices

Will I receive late accounting penalties during the Cutover Period?

• No, Late accounting penalties will not be issued during the Cutover Period and for a period of time following cutover

Will I receive Administrative Monetary Penalties (AMPs) during the Cutover Period?

• No, AMPs will not be issued during cutover due to legacy systems not being available. Penalties occurring during this period, will be issued after the May 13th CARM go-live.

Will the CARM Client Portal (CCP) be available during Cutover Period?

• No, the CCP will not be available during the Cutover Period.



The Cutover Period to CARM – What TCPs need to know (4 of 7)

Can I make payments during the Cutover Period?

- The April Statement of Account (SOA) will be generated the evening of April 24th (and distributed on the 25th) as per current process.
- For the April SOA, payments must be made by April 30th using:
 - Online Banking (via financial institution platforms);
 - Electronic Data Interchange (EDI);
 - > Point of Sale (POS) systems/Cash/Cheques at POEs/Cheques mailed to CBSA, Accounts Receivable Management Unit.
- Payments using the following methods *cannot* be made during the Cutover Period:
 - Pre-Authorized Debits (PAD) cannot be withdrawn on April 30th. April PADs will be processed on May 13th for all existing PAD registrants.
 - Payments on CCP using credit/debit cards.
- Payments will only be reflected in client accounts post go-live.

Will exchange rates files be available during cutover as they are required for calculations in SWI?

- The process by which clients are getting exchange rates through CADEX will be discontinued on the first day of cutover, however;
- CBSA will run all regular system batch programs the night of April 26th, which means that the exchange rates file will be made available to TCPs for the weekend of April 27-28 as per current process
- Exchange Rate API will be available during cutover starting on April 29th.



The Cutover Period to CARM – What TCPs need to know (5 of 7)

How do I submit my Temporary Importations during the Cutover Period?

 Commercial Temporary Importations will follow the current-state process using the E29B form. There is no need to capture in the CCP once CARM system goes online May 13th.

What do I need to present for Customs Bonded Warehouse Movements during the Cutover Period?

- CBSA will accept and process paper type 10 B3s, electronically submitted RMDs (EDI), paper RMD option.
- For ex-warehouse movements, clients may reference and/or show proof of their approved in-warehouse movements in order to remove goods from their warehouses during the cutover period.
- Clients should keep account of their CBW movements after their inventory has been captured for conversion (i.e., at the start of the cutover period) and post their accounting once CARM R2 goes-live. These accounting submissions should reflect any changes to their opening inventory balance since it was captured (e.g., adjust the opening inventory CAD Type 10 with any additional movements in-warehouse, submit new CADs for any movements between or out of warehouse movements).

How do I submit my Duties Relief Program (DRP) applications and Drawback claims during the Cutover Period?

DRP applications and Drawback claims will follow the current-state process



The Cutover Period to CARM – What TCPs need to know (6 of 7)

Can I submit paper requests during the Cutover Period?

• TCPs are asked, where possible, to refrain from submitting any paper Single and Blanket B2 Adjustments, Voluntary Disclosure requests and Duties Relief Program diversions and wait to submit electronically in CARM.

What if an importer does not have a BN and RM account during the Cutover Period?

- Use of Broker BN/RPP to obtain release of goods Existing "First time" and "One time" importer policy maintained during cutover period.
- CBSA administrative BN on C-Type entry if client not using broker.
- TCPs can continue to work with the CRA to obtain a BN/RM account.
 - Importer BN/RM issued by CRA during cutover can be used during the cutover period for purposes of obtaining release, however;
 - Exporter BN/RM issued by CRA during cutover will not be able to be used until May 13th go-live Additional information will be provided regarding process for new exporters seeking to export goods during cutover period.

Can I submit appeals during Cutover?

- **Yes,** TCPs can submit their appeals using the recourse e-mail submission process.
- The first step in "registering" to have access to the e-mail submission is to complete the online e-appeal at <u>https://www.cbsa-asfc.gc.ca/recourse-recours/eappealenf-appelexec-eng.html</u>
- Paper submission is available, however e-mail submission is the preferred option.



The Cutover Period to CARM – What TCPs need to know (7 of 7)

Will the testing environment for EDI and API clients be available during the Cutover Period?

- **No,** the testing environment will not be available during the Cutover Period.
- Testing and certification activities will resume the week of May 20th.

When will I be able to submit my "CAD backlog" after go-live on May 13th?

- Assumption: CADs to be processed at specified periods of time based on release dates.
- Analysis is in progress and detailed plan will be communicated the second week of April.

From a technical aspect, how will the creation of the required new system connectivity and profiles take place?

- For TCPs that are currently receiving Daily Notices (DN) and SOA documents, the CBSA will "grandfather" and migrate existing profiles from the current environment to the CARM R2 environment
- For TCPs that require changes to their DN or SOA profiles, the CARM Project engaged with TCPs in advance of the CARM R2 Cutover activities to update their profiles prior to the implementation of CARM R2.

Transition Period Update

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Transition Period

- Release Prior to Payment (RPP) 180 day transition period
- Use of broker BN 1 year transition period
- Open discussion relating to the transition period

Update on RPP – Minimum Security

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Summary of changes for importers

	Currently	At CARM R2		
Written security agreement calculation formula	For importers: 100% of average monthly duties and taxes (excluding GST) over prior 12 months	50% of highest month of duties and taxes (including GST and all debts (ARs) that are posted on the account) over prior 12 months		
Deposit (Cash security)	100% of average monthly duties and taxes (excluding GST) over prior 12 months	100% of highest month of duties and taxes (including GST and all debts (ARs)) over prior 12 months		
Minimum requirement	The minimum security requirement to transact business at all CBSA offices in Canada is CAN\$5,000	 For Written security agreement: \$5,000 per RM account For Deposit : No minimum requirement 		

Summary of changes for importers (Cont'd)

	Before CARM R2 Go live	At CARM R2 Go Live
Maximum requirement	▶ \$10M CAN	\$10M per RM account
Release Prior to Payment (RPP) Options	 Use a broker's account security Importer Direct Security Option GST Direct Payment Option 	Importers must provide their own security

The Financial Security (Electronic Means) Regulations, SOR/2024-42 (Canada Gazette, Part II, Volume 158, Number 6) have now been made and are registered and published at <u>Financial Security (Electronic Means) Regulations</u> (justice.gc.ca).

CES 2.0 Close-Out

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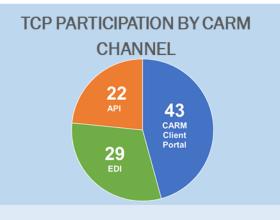


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- 2. CES 2.0 Support
- 3. Outstanding System Changes & Enhancements
- 4. Key Observations
- 5. Recommendations for Future Simulations



CES 2.0 Overview



ENGAGEMENTSESSIONS

- 1 GENERAL INFORMATION SESSION
- **1** KICK-OFF SESSION
- **30** TCP TOUCHPOINTS



CARM EXPERIENCE SIMULATION PARTICIPANTS 41 CES PROJECT SUPPORT

143 MODEL CBSA44 TRADE CHAIN PARTNERS

TCP PARTICIPANT BREAKDOWN*

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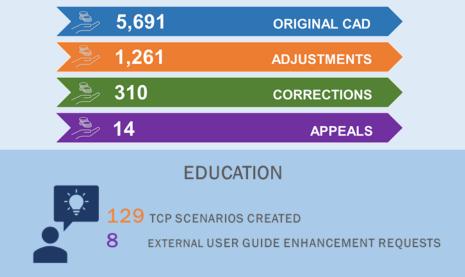
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CAD SUBMISSION BREAKDOWN*



*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) 3. CADs included submissions associated with EDI Certification/API

Trade Consultant

Broker

Carrier

CSA Carrier
 Importer

CSA Importer

Custom Bonded Warehouse

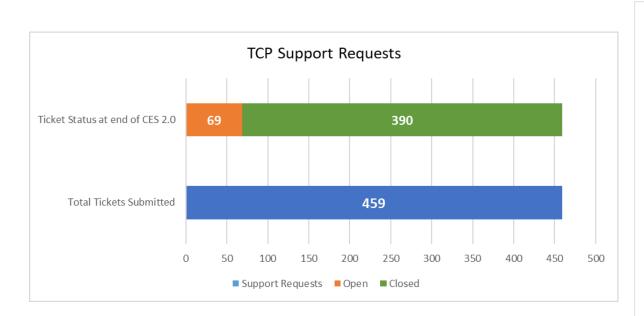
Financial Security Provider
 Non-Resident Importers

Software/Service Provider

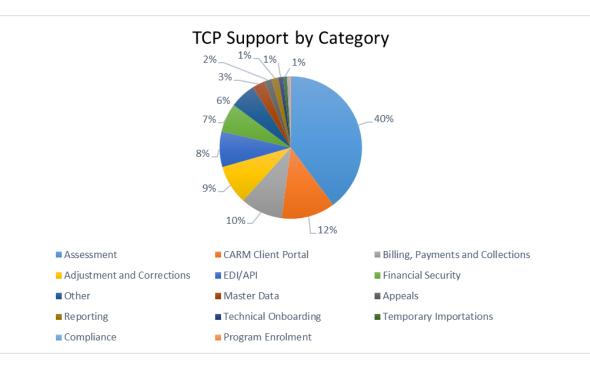
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CES 2.0 Support

The CES 2.0 support team received **459 tickets from TCPs** during CES 2.0



The outstanding 69 tickets will be reviewed and prioritized following R2 implementation.





CES 2.0 Outstanding System Changes & Enhancements

- One priority system change to allow TCPs to self-declare a net excise tax amount of \$0.00 is scheduled to be implemented before R2 Go-Live
- Remaining TCP-initiated tickets will be reviewed and, if applicable, prioritized for implementation following Release 2.
- Twenty-six (26) enhancements to the CARM design were recommended by TCPs and will be reviewed as part of the CARM enhancement process. These focus on:
 - Financial Security
 - Portal Usability
 - Reporting
 - Mass Adjustments
 - Drawbacks

Key Observations

CES 2.0 incorporated the lessons learned from CES 1.0 to provide an improved experience for all parties involved.

Key successes:

- Highly engaged participants.
- Significant improvement in the fulsomeness of CBSA reference data in the environment.
- CBSA program area participation in TCP discussions.
- Creation of CES 2.0 scenarios and weekly topic-specific discussions provided additional structure to the simulation.

Key challenges:

- Majority of participating software/service providers were not certified before starting CES.
- CES 2.0 and R2 Readiness (EDI certification/API onboarding) running in parallel caused challenges.
- Planned system changes were not communicated to users in advance.
- Not all business processes could be simulated due to environment limitations.

Recommendations for Future Simulations

- Timelines should reflect the scope of change, impact of the change and level of participant experience.
- Invest time in advance to ensure participant readiness and align on the approach.
- Take a structured approach to assist participants in their activities while also providing flexibility for users to explore the system.
- The simulation environment should reflect production as closely as possible.
- Ensure participants reflect a representative sample of impacted stakeholders.
- Have program area representatives lead TCP discussions to provide guidance and obtain first hand feedback from users.
- Establish forums (e.g., regular virtual touchpoints) to foster collaboration and provide an opportunity to learn from each other.
- Leverage simulations to gain user insights into early design thinking.
- Inform participants of upcoming system changes.
- Allocate sufficient time to complete wrap-up activities following the end of a simulation (gradual wind down vs. immediate stop) and continue to engage with participants during this phase.

EDI Certification Update

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CAD EDI Certification/API onboarding as of 2024-03-15

- There are 30 defined test scenarios and a Smoke Test that a software package can be tested against.
- In order for a software to be deemed "ready", it must have been tested successfully against the scenarios the TCP has identified as applicable to their service offerings. Tests are validated by the CBSA against test objectives.
- 27 unique software package providers with 33 TCPs participants representing 98.8 % of CBSA's transaction volumes.
 Note that Duties and Taxes and Transaction Volume percentages shown below are approximate.

Status	Software Ready all in scope tests completed	> 75% in scope tests completed	50%-75% in scope tests completed	< 50% in scope tests completed	Testing In Progress (engaged and testing initiated but, experiencing connection or software issues)	Not Reporting
# of software packages	3	3	8	4	7	2
% Duties and Taxes	3%	32%	36%	15%	9%	4%
% Transaction Volume	1%	35%	29%	22%	10%	2%

Industry Feedback

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Closing Remarks

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Appendix

TCP Portal Onboarding Update

Updated March 20th, 2024

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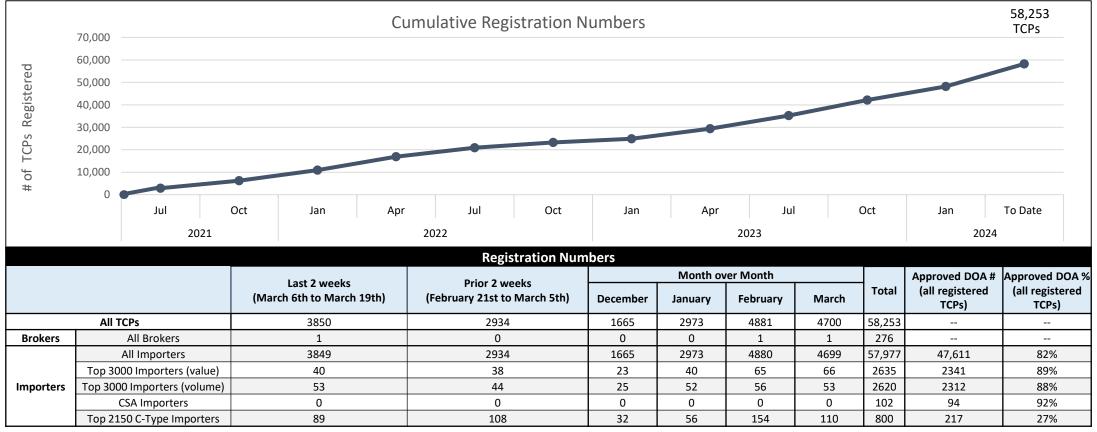
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Trade Chain Partner Portal Onboarding Status

58,253 TCPs are currently registered



• Top 3000 Importers (volume) make up ~80% of Total Importer Volume. Top 3000 Importers (value) make up >80% of Total Importer A/R.

Updated March 20th, 2024

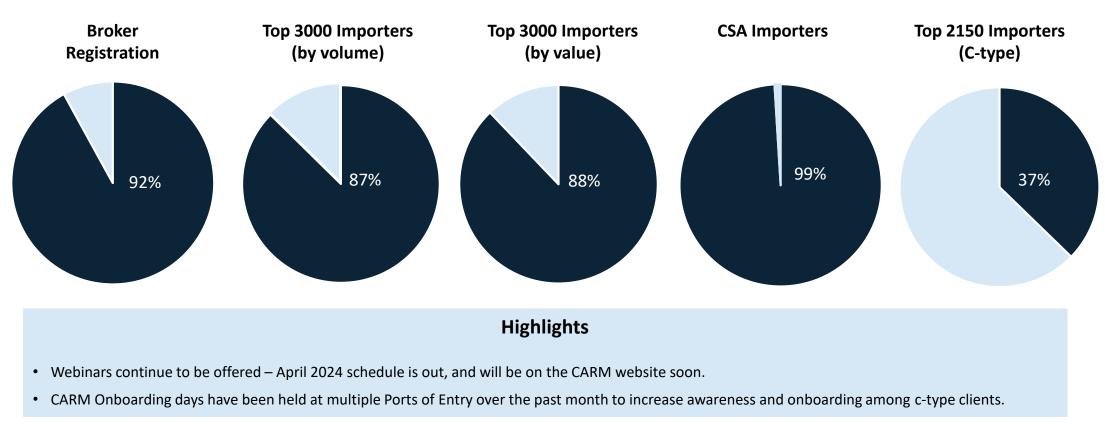
CSA Importers account for 35% of Total Importer A/R. CSA Importers with multiple RM accounts are counted as separate importers.

• Top 2150 C-Type Importers transact at least once per month on average.

• Approved DOA refers to the number and percentage of TCPs that have successfully delegated authority to a third party service provider.



Trade Chain Partner Portal Onboarding Status



Updated March 20th, 2024