

Ted Gallivan
Executive Vice-president
Canada Border Services Agency
191 Laurier Avenue West
Ottawa, ON K1A 0L8

May 14, 2024

Dear Mr. Gallivan,

We are writing to bring your attention to a number of key issues identified by the Canadian Society of Customs Brokers (CSCB) Board of Directors and membership concerning importer registration and delegation of authority in the CARM client portal.

We understand from the April 19, 2024, announcement that the Canada Border Services Agency (CBSA) believes CARM is ready for use and that it has been implemented for internal users on May 13, 2024. Given the stated level of readiness, as well as the fact that CARM will not be fully implemented for external entities before October 2024, we believe there is time and opportunity to address a number of challenges with importer registration and delegation before access is opened for wider use this fall.

Addressing these key challenges will make it easier for importers to register, and for customs brokers to assist them with registering, delegating, and maintaining up-to-date delegated system access.

As the gap between an importer's registration/delegation and actual use of the system becomes ever wider, it is important that processes are in place to ensure accounts can be activated, deactivated and modified in an efficient manner as employees transfer among different importers or brokers. We are aware of at least one situation where an individual's Business Account Manager (BAM) profile followed them from one employer to another, allowing them to access information about their previous employer's clients and transactions.

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Please find below a summary of the key registration and delegation issues we have identified as requiring immediate resolution. The CSCB stands ready to provide input into potential solutions, and we welcome an opportunity to coordinate a meeting between your team and members of our Board to discuss further.

Sincerely,



Janine Harker
President, Canadian Society of Customs Brokers

Cc: Jennifer Lutfallah, Vice-president, Commercial and Trade Branch
Mike Leahy, Director General, CARM Project

Issue	Possible Resolution
<p>Importer of Record (IoR) registration is unduly complex because CRA's required level of precision for address and company name wording and/or punctuation leads to data entry issues.</p>	<p>Partial solution: CBSA to advocate with CRA to relax requirements for 100% match on certain address and company data elements (Ltd/Limited/Ltée; Co/Company/Co.; E./East; W./West; etc).</p> <p>More robust solution: CBSA to work with CRA to pre-populate address data (based on corporate registration records) in the back end of the registration tables to allow address lines to auto-populate with likely matches when an IoR is registering in the CARM Client Portal. The IoR/broker then selects the appropriate pre-existing option rather than trying to guess how the address should be written.</p>
<p>Rigid processes, limited availability, and requirement for multiple specific records/data elements impede an importer's ability to interact productively with the CARM help desk, leading to multiple interactions between brokers and their clients to source and supply the necessary data.</p>	<p>Solution: Customs brokers should be authorized to interact with the CARM help desk on behalf of their clients. Authorization to interact can be provided to CBSA through presentation of a valid General Agency Agreement (GAA) rather than through additional online registration processes.</p>

Issue	Possible Resolution
<p>Brokers do not have visibility on whether an importer of record (IoR) is already registered in the CARM Client Portal (CCP), leading to extra and unnecessary efforts to confirm that a) the IoR is registered and, if so, b) the IoR has delegated authority to the broker.</p>	<p>Partial solution: CBSA to provide a Y/N indicator or flag in response to broker requests to indicate if IoR is registered in the CCP. CBSA to provide an additional Y/N indicator or flag in response to broker requests to indicate if IoR has delegated authority to requesting broker.</p> <p>More robust solution: CBSA to develop a broker-specific portal/interface with enhanced search functionality to allow brokers to perform queries with respect to:</p> <ul style="list-style-type: none"> - IoR registration - Delegation of authority - IoR's financial security status (Y/N) and saturation level - Credits that could be applied to IoR's amounts accounts receivable (even if credits result from transactions involving a different delegated broker) <p>The customs broker portal should also provide functionality to allow brokers to easily identify pending/outstanding requests for delegation of authority (rather than having to search for them).</p>
<p>Staff turnover within importers and brokers lead to situations where BAM information is no longer current. Customs brokers need better access to the names of individuals associated to/delegated by IoRs so they can identify who is/was a BAM for a given client.</p>	<p>Partial solution: CBSA to provide customs brokers with access to data on "current" (existing BAMs) when the broker submits an entity-specific query.</p> <p>More robust solution: CBSA to develop a broker-specific portal/interface with enhanced search functionality to allow brokers to perform queries with respect to:</p> <ul style="list-style-type: none"> - All employees and delegated individuals for an IoR, with a specific flag for those with a BAM profile.

Issue	Possible Resolution
<p>Customs broker delegation of authority in CARM is duplicative to the authority granted by the IoR to the broker by virtue of a General Agency Agreement (GAA)</p>	<p>Possible clarification: CBSA to provide clarification of why (systems requirements; policy requirement; etc.) broker delegation is required within CARM if a valid GAA/power of attorney is in place.</p> <p>CBSA to provide clarification about whether delegation needs to be associated to the ability to push the CAD and receive feedback on it.</p> <p>Partial solution: CBSA to provide a response message in the system when a release has occurred (confirming/negating delegated authority).</p>
<p>Customs brokers require access to transactions originally processed by another brokers, especially in cases involving change of Free Trade Agreement (FTA) application or tariff application. Access by a subsequent customs broker should not freeze/remove access by the original customs broker to transactions they were responsible for.</p>	<p>Partial solution: CBSA should provide customs brokers with full visibility on past transactions involving their IoR client (for whom they have delegated authority) even if they were not the original broker for a specific transaction.</p> <p>More robust solution: CBSA should expand its versioning capability to provide full access to past transactions involving other customs brokers to allow adjustments to proceed, while ensuring that a “locked” version of the original transaction is retained for the original customs broker to ensure integrity in record keeping.</p>
<p>Lack of clarity concerning which of the registration and delegation issues raised by Trade Chain Partners (TCP) have been added to CBSA’s list of “future enhancements” post go-live in May 2024, as well as no indication of a timeline for those future enhancements to be analysed and implemented.</p>	<p>Solution: CBSA to provide CSCB and other TCPs with the list of proposed future enhancements under consideration.</p>