

CARM Frequently Asked Questions

1. Must all CBSA clients have an account in the CARM Client Portal (CCP)?

All clients must have accounts in the CCP, and must link a CCP user account to their business account.

2. Will a new importer need a CCP account to complete a Type C CAD to obtain release at a CBSA office?

The importer, or their customs broker, will need to have access to the CCP (CARM Client Portal) to prepare a fully completed "Type C" CAD to obtain release of their goods (current B3 Type C "Cash" entry). This option will not be available via EDI. There will be a workstation available at the Port of Entry that will allow the importer/customs broker to access their portal account to prepare the CAD; alternatively, the importer/customs broker can complete and print the declaration for goods arrival processing ahead of time, if desired, to avoid completing the CAD at the CBSA office.

3. Once registered on the CARM Client Portal (CCP), if the business information is incorrect, can it be corrected on the portal?

With Release 1, importers and customs brokers will be able to see their business information in the portal, however, if there are errors in the data, only certain changes can be made in the portal. User account updates (email and phone contact information) and the delegation of authority can be changed via the portal. Legal entity information (i.e. business number or company name changes) will need to be changed as per the current process and updated with the CRA.

4. When an importer delegates authority to a "customs broker" does every person at that customs broker who will be accessing the portal or submitting a CAD have to register and set up an account?

Every individual who wishes to access the CARM Client Portal (CCP) will need to register and set up a user account and be delegated appropriate authority by their employer. CAD submissions may be performed via the CCP and/or EDI. Therefore, if you intend to submit a CAD through EDI, you will not necessarily need a portal user account. An importer will not delegate authority to individual employees, they will delegate authority to the customs broker business account through the business account manager (BAM). So unless you are a BAM, the importer will not delegate authority to you individually.

5. Will there be restrictions in the number of users that can be granted delegated access to a business account in the portal?

No, there are no restrictions to be made on the number of users that can be granted delegated access.

6. Can anyone submit a CAD?

A new commercial accounting declaration (CAD) will be introduced with CARM Release 2. The CAD can be submitted via electronic data interchange (EDI) or the CARM Client Portal. Only importers and delegated licensed customs brokers will be eligible to submit a CAD.

7. Which data elements will be used to validate if a CAD has been submitted in CARM for a released transaction. Will it be the 14-digit transaction number +importer number?

The transaction number on the CAD will continue to be used to acquit the transaction number on the release.

8. Who can access a transaction for correction prior to payment?

Only the importer and licensed customs broker who submitted the CAD will have access to make a correction prior to the payment due date. However, if the importer removes delegated access between CAD submission and the payment due date, only the importer will have access to make a correction.

9. If an importer makes a correction to a CAD (before the payment due date,) will the original filer (i.e. customs broker) receive a notification that the entry has been revised?

No, the customs broker will not receive a notification. The importer will need to notify their customs broker that a change has been made.

10. Which data elements can be corrected on the CAD? Is anything else required other than filing the new version?

Most data elements, with the exception of the business number and the transaction number, can be done until the payment due date. If the correction results in a downward adjustment to the CAD, documents may be requested by the CBSA. If so, they will need to be uploaded in the portal.

11. Who is responsible to make sure that the starting point for an adjustment is the correct version if the CCS does not update drawbacks and blanket requests currently?

This does not change from today; an adjustment must be made against the most recent data.

12. Will the Statement of Account (SOA) be available to the customs broker via EDI?

The importer's SOA will be made available to any party with delegated authorization to view or download it on the portal. However, in order for a customs broker to receive it EDI, they will require authorization from the importer and must be set up with the TCCU as is required pre-CARM.

13. Will SOA authorization be grandfathered in CARM?

This question has been asked to the CBSA, we are waiting to hear back.

14. Will more than one customs broker be able to receive the SOA, contrary to the practice today of only one broker?

This question has been asked to the CBSA, we are waiting to hear back.

15. Will the Statement of Account be available in Excel?

No, the current design is protected PDF or EDI.

16. Will I be able to submit my release documentation through the CARM Client Portal?



Release documentation is not part of the CARM scope; however, you will be able to prepare and submit a fully completed CAD (Current C Type Entry) in the CCP and present the package for release at the port.

17. Will there be a system timeout in the CARM portal due to inactivity, and will there be an auto-save function that will save information input by user if there is a forced log off of their account?

CARM will align with an Single Sign-On (SSO) timeout of 20 (twenty) minutes without any key strokes. There is also an 8 (eight) hour limit for being logged in before being prompted to log in again. CARM is looking at the auto-save function for data entry.

18. Will late accounting penalties appear on importer Daily Notice?

Yes, they will appear on the Importer DN and appear on the Statement of Account.

19. How will the CBSA know to expect the accounting information from the importer vs the customs broker who filed the clearance?

The CBSA will expect the CAD within the time limit (max 5 business days from release) from either the importer or a delegated licensed customs broker, regardless of who submitted the release documentation.

20. Will GST be included in the financial security calculation?

Yes, the amount of security posted to an importer's account duties and taxes (GST), as well as interest, adjustments, ascertained forfeitures, and SIMA fees. The bond will secure any penalty fees, however, penalties are not used in the calculation of the amount of bond required to cover the account.

21. Will all importers be required to post security for release prior to payment privileges?

All importers will be required to post security to participate in the RPP program. If posting a surety bond, the amount of the security required for must be equal to or greater than 50% of the importer's highest monthly accounts payable to the CBSA within the most recent 12-month period from July 25th to July 24th, subject to a \$25K minimum. If posting a cash bond, the amount of security must be equal to or greater than 100% of the importer's highest monthly accounts payable to the CBSA within the most recent 12-month period from July 25th to July 24th, with no minimum.

22. Will Importers with monthly outlays of <5000 also be required to post security for release prior to payment?

Yes, see above, answer to Question 21.

23. Will the \$10 million cap remain?

Yes, the \$10 million cap currently in place will remain.

24. Which payment options will be available once CARM has been implemented?

A Pre-Authorized Debit (PAD) option, with a limit of \$99 million, will be the preferred method of payment, however, other electronic methods of payment will also be accepted, including debit and credit card payments. The limit for credit card payments is \$4,999.99. For debit payments, the limit



set by the CBSA is \$100,000, and \$100M for PAD payments, but limits are ultimately set by the financial institution.

25. Can multiple credit card payments be made to cover one single amount owing?

Yes, multiple credit card transactions can be made to cover payments in excess of the \$4,999.99 credit card limit.

26. Will data remain in the portal for six years?

Yes, data will remain in the portal for six years, plus current.

27. Does CARM apply to us? We mostly export with the exception of molds made to produce our product.

CARM will be a mandatory requirement for Importers. If you are only an exporter you will not be affected by CARM.

28. Is it mandatory to set up an account to bring in products from the U.S.?

Yes it is. CARM will be a mandatory requirement for Importers in order for CBSA to allow the broker(s) to release and account for your goods.

29. What are we supposed to and when do we need to do it by?

CARM Release 1 – May 25, 2021: The CBSA will provide current clients (Importers, customs brokers and trade consultants) with the ability to sign up on the CARM Client Portal to create, view, and manage their accounts, make payments, file advanced ruling requests, delegate access to customs brokers online and otherwise become familiar with CARM self-serve options.

CARM Release 2 – May 2022: The CBSA will replace the current B3 (customs coding form) and B2 (adjustment request) forms and related processes with a new electronic declaration form, called the Commercial Accounting Declaration (CAD). Changes to the billing cycle will be introduced to harmonize the payment due dates for all transactions and simplify the ways account information can be corrected and adjusted. In addition, changes to the Release Prior to Payment Program will be introduced whereby importers interested in participating in the program will be asked to post financial security directly, with various online options.

30. Where can I find a CARM checklist for clients identifying User Roles?

Farrow has provided an easy checklist you can refer to.

Farrow has provided a Fact Sheet that defines the user roles.

31. Will Farrow be hosting a webinar covering A/P, Purchasing, Finance, and Shippers?

Yes, please stay tuned, we will be hosting a webinar in April.

32. Will there be a test pilot program?

The CBSA have not advised that there will be a test pilot.

33. Will CBSA be providing a step by step reference guide as to how to navigate the portal?



Yes, the CBSA have advised that there will be a reference guide and instructional videos which Farrow will add to our website, you can also refer to the CBSA website for future updates and instructions.

34. For companies that have one BN with multiple RM's, how does that work when setting up in the CCP. i.e. One 9 digit BN, with different RM's. The different divisions operate separately. How do I advise regarding BAM etc. that are set up in the portal?

You need only to enter your importer RM extension when registering your business. If there are any other RM accounts registered to the same 9-digit BN, they will automatically populate and be included on the portal under the 9-digit BN.