

CARM: A Primer Webinar Q&A

The questions asked by the attendees during the Q&A portion of the webinar are answered below:

Q: When should we apply for our GC Key ? It appears we have to wait for Release 1.

A: New CARM GCKeys will only be available at Release 1.

Q: I have a Bond for the U.S. but not for Canada. Does that mean I will need one for Canada as well?

A: Yes.

Q: Is the GC Key the same one we use for My CFIA?

A: We will contact CBSA specifically regarding this question.

Q: Do we have to wait until May 25th to obtain a GC Key?

A: Yes, New CARM GCKeys will only be available at Release 1.

Q: If the organization has a GC Key, does that one need to be used for CARM or can a second GCKey be obtained specifically for CARM profile management?

A: According to the CBSA the GC KEY allows you to access the CARM Client portal and other governmental programs and services. One GCKey can be used to access multiple online Government programs and services.

Q: Can we change who the BAM is after the initial registration?

A: Yes, we recommend always setting up a second BAM. Once a BAM has approved another BAM, they both have equal access and functionality to administer all of your business and program accounts.

Q: Can an organization create more than one BAM? If so, will both BAMs have the same authority?

A: Yes, we recommend always setting up a second BAM. Once a BAM has approved another BAM, they both have equal access and functionality to administer all of your business and program accounts.

Q: Can a BAM also perform PAM functions?

A: Yes.

Q: Does our accounting department need to be added to CARM to be able to pay our GST or other bills payable to CBSA?

A: Yes, this can happen just prior to Release 2.

Q: I have an RP extension and an RT extension but do not have an RM extension that I am aware of. How do I apply for this number?

A: Any importing company would have an RM extension, if you are unsure, please email carm@farrow.com and we will be happy to help you with the specific details.

Q: What is the major difference between BAM & PAM?

A: BAM is the person who would have financial information of the company and they would go into the portal and do the initial setup and assign a PAM. The PAM person would manage the day-to-day activities and would be able to delegate other persons' access.

Q: What is a GC Key? How/where do we get a GC Key?

A: Government of Canada Key. Navigate to the CARM Client Portal landing page (once available) and follow the instructions on the screen to complete your GCKey registration.

Q: If you have a GC Key from another portal like CERS, can you use the same GC Key for CARM or are you required to register for another GC Key specifically for CARM?

A: Specifically to CERs, yes you can use the same key.

Q: I work for a municipality. How does CARM impact municipalities and are we required to set up an account?

A: If you are a commercial importer, all trade chain partners that conduct commercial business with the CBSA will be required to register their business on the CARM Client Portal.

On March 18, 2023, the CBSA confirmed that financial security will NOT be required from the following:

- The government departments and agencies listed in following schedules of the Financial Administration Act:
 - Schedule I,

- Schedule I.1
- Schedule II
- Crown corporations listed in Schedule III, Part I of the Financial Administration Act
- Provincial and territorial government departments and ministries
- Liquor Control Boards enabled by the Importation of Intoxicating Liquors Act

Q: Payment of GST and duties can be paid through TD or just brokerage charges?

A: Duty and Taxes can be paid through the bank.

Q: Once the BAM person signs up in the portal and has assigned a PAM, what would the role of the BAM person play? Why would 2 BAM's be required if the PAM person can manage all of the day-to-day activities?

A: The BAM is responsible for:

- Registering your company on the CCP;
- Requesting access to your client accounts;
- Approving and assigning user roles to each subsequent user, including additional BAMs to help with the administration of the business account.

Once a BAM has approved another BAM(s), they all have equal access and functionality to administer all of your business and program accounts.

Q: Delegation to brokers can be done per shipment or does it need to be done on a blanket basis for all future shipments?

A: Delegation would happen one time.

Q: I don't want to have to do anything. I'd rather have Farrow take care of everything for us. We are a small shop - we just don't have the personnel for this.

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

Q: What will this mean in regard to the paperwork we prepare for shipments? USMCA etc.?

A: During Release 1 there are no changes to the paperwork for releases imports. At Release 2 If there is a correction required, documents may be requested by the CBSA. If so, they will need to be uploaded in the portal.

Q: Are there any know differences or exceptions if you are an NRI?

A: No, other than you will need to make payment in Canadian Dollars.

Q: If I have more than one customs broker, how will this impact this whole process?

A: If you have more than one service provider, you will need to delegate authority to each of your service providers and determine what visibility/functions they will have in your portal.

Q: What role will Farrow need to be assigned?

A: You will receive a request to delegate authority to Farrow. You will determine the role that Farrow will have regarding your organization. This may be determined by your General Agency Agreement and the activities that Farrow performs on your behalf. It may include submitting the Commercial Accounting Document, Requesting Rulings, filing Corrections and submitting Appeals.

Q: Is a PAM required, or could a small company just have 2 BAMs?

A: A PAM is not required, the User Roles will be determined by the organization and based on the needs of your business. You will need to decide how manageable it would be to have 2 BAM's managing all aspects of the portal. BAM's can perform PAM functions.

Q: We are a registered carrier but we do import from time to time. Most low-level entries and sometimes commercial trucks for our fleet and parts. Will this affect us? Is there a cut off for only registered importers?

A: All importers into Canada must register in the CARM Portal prior to October 2023.

Q: I've tried to get a GCKey but was unable. Is this only open after May 25?

A: You will be able to apply for a GCKey directly through the portal when the portal becomes available. This will be a more efficient and quicker way to receive the key than the current process.

Q: I do see resistance of staff using the GC Key and Partner log-in as they are asked to use personal information to register. Has this been an issue for others and is there a way to get around this issue for staff creating B3s in particular?

A: This is mandatory and there is no way to get around it. It is important to know that the release process is not changing and everything that takes place in CARM is after release.

Q: Is there any limitation on bond requirement based on the monthly bond that might be required? (Example - if the non-resident account pays \$100, do we still require a bond of at least \$25,000? Or is there a way to have a lower amount bond?)

A: Currently, the minimum amount for a bond is \$25,000.00. There are still changes happening as it relates to Release 2 and it is important to remember that Release 2 is not live until October 2023.

Q: Can we apply for another one even if we have a CERS key or must we use the same Key?

A: Each individual user will need their own GCKey. The CERS key has been confirmed that it will work in the CARM Portal. You can apply for a new GCKey.

Q: If I have a GCKEY for emanifest, will this work for CARM, too?

A: The distinction appears to be that GCKey for a CBSA program such as CERS, Emanifest and PIP will work but GCKeys for other Government Agencies will not.

Q: I am a one person operation. How difficult will this process be for me to implement?

A: For Release 1 this will not be difficult to register on the portal and delegate authority. As we move into Release 2, we can support you with recommendations as it relates to Financial Security.

Q: Is there an opt-out for those who prefer to not share personal details for a professional function? We can't require employees to share personal information.

A: No, there is no opt-out option. This is a mandatory requirement for all Importers.

Q: Will the US surety companies be able to provide a CA bond?

A: Many US surety companies have a presence in Canada.

Q: If you have a GC Key already, are you automatically delegated as the BAM or PAM for your company or is delegation assigned internally?

A: The initial user who sets up the CARM Portal automatically defaults to the first Business Account Manager. They will be able to delegate authority and assign User Roles for your company. As authority is delegated, other Users will begin to have permission to manage functions as delegated to them.

Q: Will Return merchandise be covered under your importer account or do you need an additional export account?

A: Merchandise returning to Canada still requires an entry and therefore will follow the same process as a regular import.

Q: Is the bond calculated on 50% annual duties taxes fees or a rolling 12 months?

A: At this time the amount of security required for the bond must be equal to or greater than 50% of the highest month of duties and taxes within the most recent 12 month period from July 25th-July 24th.

Q: Can a BAM be a US citizen/based employee?

A: Yes.

Q: I prepare the Proforma and Commercial invoices for shipments going in and out of our plant. Will I be doing this through the portal in the future?

A: No, the functions in the Portal are for after-release.

Q: Will this impact drawbacks filing?

A: No changes for Release 1, Release 2 has some proposed options for drawbacks in the portal.

Q: Do we need to register our Export Business #s on CARM as well? (RT extension, etc.)

A: The CARM Portal is designed to connect all of your customs business.

Q: If I have Farrow for our freight forwarders with POA and small package courier that also has POA and both get declared as brokers, will there be any issues or confusion with who has the ability to submit a shipment for customs?

A: Is your question specific to Release and if so, there are no changes to the release process.

Q: From my understanding, it appears CARM is CBSA's counterpart to CBP's ACE. Is this correct?

A: It is similar

Q: What is the cost of a 25K bond?

A: There is no pricing available as of yet.

Q: How does this effect returns to the US as exporting?

A: This is an import program and we do not expect any impact on exporting however if you are filing drawbacks, changes may occur at Release 2.