



Regulatory News Alerts & Updates

Regulatory Alert: CBSA Agency Assessment and Revenue Management (CARM) Update 6

June 18, 2025

Urgent: Post financial security to obtain Release Prior to Payment (RPP) privileges

The Canada Border Services Agency (CBSA) Assessment and Revenue Management (CARM) program came into effect on October 21, 2024, and has changed how the CBSA manages commercial goods imported into Canada. To avoid **significant clearance delays**, all commercial importers—resident and non-resident—must post financial security by enrolling in the Release Prior to Payment (RPP) sub-program through the CARM Client Portal (CCP).

How to enroll in the RPP program

To begin, [review the CARM Client Portal User Guide: Post financial security for RPP privileges](#)

Step 1: Choose how you will post financial security

Option 1: Post a Cash Deposit

Use the CCP to make a deposit via:

- Credit or debit card (for amounts under CA\$5,000)
- Online banking (for amounts over CA\$4,999.99)

[For details, visit the CBSA's Commercial Import Payments page](#)

Option 2: Post a Surety Bond

If you need a service provider to obtain a surety bond, FedEx can assist you.

Email us at CARM@fedex.com.

Step 2: Confirm and notify

FedEx customers: Once you've posted financial security, email CARM@fedex.com so we can update our records.

Important: Your required financial security amount is shown in your CCP account. Use the [CARM Client Portal User Guide: View your RPP Financial Security Information](#) to check your amount.

Need support?

Call **1.800.461.9999 ext. 2** (toll-free from Canada/US) or use the [CBSA Client Support Form](#).
Also see: [CBSA's Common RPP & Financial Security Challenges Information Sheet](#)

Non-Resident Importers (NRIs): What you need to know

If you import commercial goods into Canada without a Canadian place of business, as the importer of record, updated obligations under Customs Notice 25-01 apply.

Use the table below to understand the difference between casual (non-commercial) and commercial goods, along with key implications:

Category	Casual (Non-Commercial) Goods	Commercial Goods
Conditions	<ul style="list-style-type: none">Imported for personal use or consumptionCustoms cleared using the Business Number (BN) of the courier or customs broker	<ul style="list-style-type: none">Imported for sale or any commercial, industrial, institutional, or occupational useCustoms cleared using the NRI's BN—even if the goods seem casual
Examples	<ul style="list-style-type: none">Gifts, personal items, or online orders not intended for resale	<ul style="list-style-type: none">Inventory, equipment, or e-commerce goods sent to customers or retailers
Tax & Regulatory Impact	<ul style="list-style-type: none">May qualify for simplified clearance and exemptionsSubject to GST and applicable provincial sales taxes at time of import	<ul style="list-style-type: none">Subject to full commercial import obligations, including tax remittance and documentationGST applies at time of import
Important Notes	<ul style="list-style-type: none">Using your own NRI BN to clear casual goods reclassifies them as commercial	<ul style="list-style-type: none">Regulated goods (e.g., Health Canada) may require additional documentation and cannot be cleared as casual using an NRI BN

Regulated goods and Other Government Departments (OGDs)

Casual goods that are regulated by Other Government Departments (OGDs)—such as Health Canada—and are released and accounted for using an NRI's BN are treated as commercial goods. These do not qualify for casual exemptions and may be subject to:

- Additional documentation requirements
- Higher duty and/or tax amounts
- Ineligible importation for some items

Need to determine how your regulated goods may be affected by import requirements?
Review the [OGD reference list](#) on the Canada Border Services Agency (CBSA) website.

Additional requirements for NRIs

- **Provincial sales tax remittance** If you collect sales tax at the point of sale, you must register with the province(s) where the sale occurred and remit these amounts directly to the province(s) or to the Canada Revenue Agency (CRA). [Learn more about provincial sales taxes on the FedEx Canada Sales Tax webpage.](#)
- **Recordkeeping requirements** All NRIs must retain import records in Canada, the US, or Mexico. If you do not have a business location in Canada, you may appoint an authorized agent, however, the following form must be completed and submitted to the CBSA for approval. [Download Form BSF900: Agreement to maintain records elsewhere.](#)

Quick links

Action	Resource
Understanding importer of record liability	https://www.cbsa-asfc.gc.ca/publications/dm-md/d17/d17-2-5-eng.html
Post Financial Security for RPP privileges	https://www.fedex.com/content/dam/fedex/ca-canada/MVP/downloads/2025/CA_EN_CARM_User_Guide-Post_financial_security_for_Release_Prior_to_Payment_privileges.pdf
Check your RPP financial security amount	https://pre4-ccp-pcc.cbsa-asfc.cloud-nuage.canada.ca/en/assets/pdfs/onboarding/en//User%20Guide%20-%20View%20your%20financial%20transaction%20history.pdf
Review commercial import payment methods	https://www.cbsa-asfc.gc.ca/prog/arl-glcc/pay-paie-eng.html#a05_1
Troubleshoot common errors when posting financial security for RPP	https://www.fedex.com/content/dam/fedex/ca-canada/MVP/downloads/2025/CA_EN_CARM_Common-Challenges-with-RPP-Financial-Security.pdf
Understand your NRI obligations	https://www.cbsa-asfc.gc.ca/publications/cn-ad/cn25-01-eng.html
Learn about OGD importing regulations	https://www.cbsa-asfc.gc.ca/import/reflist-listeref-eng.html
View current provincial sales tax rates	https://www.fedex.com/en-ca/news/canadian-sales-taxes.html

Action	Resource
Learn about recordkeeping requirements	https://www.cbsa-asfc.gc.ca/publications/dm-md/pdf/d17-1-21-eng.pdf
Appoint an authorized agent for recordkeeping	https://www.cbsa-asfc.gc.ca/publications/forms-formulaires/bsf900-eng.html
Get CARM support & updates	https://www.fedex.com/en-ca/shipping-services/international/regulatory/carm.html
Contact the CBSA for assistance with enrolment in the RPP program, CCP technical issues and other CARM-related support	https://www.cbsa-asfc.gc.ca/contact/bis-sif-eng.html or call 1.800.461.9999 ext. 2