# Regulatory News Alerts & Updates

# Regulatory Alert: CBSA 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 <u>CARM@fedex.com</u> so we can update our records.

Important: Your required financial security amount is shown in your CCP account. Use the <u>CARM Client Portal User Guide: View your RPP Financial Security Information</u> to check your amount.

#### **Need support?**

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

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

If you import commercial goods into Canada without a Canadian place of business, as the <u>importer of record</u>, updated obligations under <u>Customs Notice 25-01</u> 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> <li>Imported for personal use or consumption</li> <li>Customs cleared using the Business Number (BN) of the courier or customs broker</li> </ul>   | <ul> <li>Imported for sale or any commercial, industrial, institutional, or occupational use</li> <li>Customs cleared using the NRI's BN—even if the goods seem casual</li> </ul> |
| Examples                      | Gifts, personal items, or online orders not intended for resale   | Inventory, equipment, or e-<br>commerce goods sent to<br>customers or retailers   |
| Tax &<br>Regulatory<br>Impact | <ul> <li>May qualify for simplified clearance and exemptions</li> <li>Subject to GST and applicable provincial sales taxes at time of import</li> </ul> | <ul> <li>Subject to full commercial import obligations, including tax remittance and documentation</li> <li>GST applies at time of import</li> </ul>                              |
| Important<br>Notes            | Using your own NRI BN to clear casual goods reclassifies them as commercial   | 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 NRl'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 <u>OGD reference list</u> 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). <u>Learn more about provincial sales taxes on the FedEx Canada Sales Tax webpage.</u>
- 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. <u>Download Form BSF900: Agreement to maintain records</u> <u>elsewhere</u>.

#### **Quick links**

| Action   | Resource  |
|--|---|
| Understanding<br>importer of record<br>liability                               | https://www.cbsa-asfc.gc.ca/publications/dm-md/d17/d17-2-5-<br>eng.html   |
| Post Financial   | https://www.fedex.com/content/dam/fedex/ca-   |
| Security for RPP   | canada/MVP/downloads/2025/CA_EN_CARM_User_Guide-  |
| privileges   | Post_financial_security_for_Release_Prior_to_Payment_privileges.pdf   |
| Check your RPP   | https://pre4-ccp-pcc.cbsa-asfc.cloud-   |
| financial security   | nuage.canada.ca/en/assets/pdfs/onboarding/en//User%20Guide%20-  |
| amount   | %20View%20your%20financial%20transaction%20history.pdf  |
| Review commercial<br>import payment<br>methods                                 | https://www.cbsa-asfc.gc.ca/prog/arl-glcc/pay-paie-eng.html#a05_1   |
| Troubleshoot<br>common errors<br>when posting<br>financial security for<br>RPP | https://www.fedex.com/content/dam/fedex/ca-<br>canada/MVP/downloads/2025/CA_EN_CARM_Common-Challenges-<br>with-RPP-Financial-Security.pdf |
| Understand your<br>NRI obligations   | https://www.cbsa-asfc.gc.ca/publications/cn-ad/cn25-01-eng.html   |
| Learn about OGD<br>importing<br>regulations                                    | https://www.cbsa-asfc.gc.ca/import/reflist-listeref-eng.html  |
| View current<br>provincial sales tax<br>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-<br>eng.pdf               |
| Appoint an authorized agent for recordkeeping  | https://www.cbsa-asfc.gc.ca/publications/forms-formulaires/bsf900-<br>eng.html        |
| Get CARM support<br>& updates  | https://www.fedex.com/en-ca/shipping-<br>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<br>1.800.461.9999 ext. 2 |