



March 18, 2024

The Honourable Judy A. Sgro  
Chair, Standing Committee on International Trade  
Sixth floor, 131 Queen Street  
House of Commons  
Ottawa ON K1A 0A6

Via email: [CIIT@parl.gc.ca](mailto:CIIT@parl.gc.ca)

Dear Ms. Sgro,

**Re: THE CBSA ASSESSMENT AND REVENUE MANAGEMENT SYSTEM (CARM)**

Whirlpool is pleased to submit comments to the Standing Committee on International Trade (CIIT) study on the Canada Border Services Agency (CBSA) CARM project. Whirlpool is a Customs Self-Assessment (CSA) importer and is one of Canada's leading importers of durable goods. We support the Government of Canada's objective to modernise and update its ageing border management and accounting systems.

Whirlpool has dedicated significant resources and investment to ensure we are ready for CARM May 13, 2024. Nevertheless, we are uncertain whether CARM will fulfil its originally intended benefits for CSA importers. We are pleased CBSA recently implemented temporary measures intended to avoid congestion and delays at Canada's major crossings for non CARM client portal (CPP) registered participant goods. We are optimistic that on May 13, 2024 that CSA/FAST<sup>1</sup> participants trucks will continue to cross efficiently at Canada's borders without delay. That said, these measures are temporary and necessitate that CBSA consult further with industry on a long-term solution.

Whirlpool are members of the Canadian Association of Importers and Exporters (IE Canada) and the Canadian Chamber of Commerce and generally support their observations and recommendations submitted under separate cover. In particular, we support the recommendation that the Government of Canada eliminate the Goods and Services Tax (GST), an input tax credit, for resident Canadian importers on the cost of acquiring a bond.

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<sup>1</sup> The Free and Secure Trade (FAST) program is a commercial clearance program designed to ensure safety and security while expediting legitimate trade across the Canada-United States (U.S.) border.

Resident Canadian companies should not be required to post a surety bond for GST on imports. This policy has a significant negative impact on importers' cash flows and increases the cost of doing business in Canada.

We thank the CIIT for its study on CARM and would be happy to answer any questions members of the committee may have in more detail regarding our comments.

Respectfully submitted,

Whirlpool Canada LP

### **About Whirlpool**

Whirlpool's history in Canada dates back to 1859. Whirlpool is one of Canada's leading marketers of home appliances with annual sales over \$1 billion. We have approximately 230 employees and our head office is located in Streetsville, Mississauga, Ontario. We operate a 750,000 square foot warehouse in Milton, Ontario and a 425,000 square foot warehouse in Calgary, Alberta. We supply merchandise to approximately 1100 retailers in over 3,500 locations across Canada. We have 1,000 authorised technicians and 450 service companies performing more than 230,000 repairs per year. Whirlpool markets and distributes major home and commercial appliances under several brand names including Jenn-Air, KitchenAid Whirlpool, Maytag, Amana, Inglis and Gladiator storage solutions.



Cc

Kyle Seeback, CIIT, Vice-Chair and MP, Dufferin—Caledon, Ontario

Simon-Pierre Savard-Tremblay, CIIT, Vice-Chair and MP, Saint-Hyacinthe—Bagot, Quebec

Chandra Arya, CIIT, Member and MP, Nepean, Ontario

Tony Baldinelli, CIIT, Member and MP, Niagara Falls, Ontario

Richard Cannings, CIIT, Member and MP, South Okanagan—West Kootenay, British Columbia

Mona Fortier, CIIT, Member and MP, Ottawa—Vanier, Ontario

Matt Jeneroux, CIIT, Member and MP, Edmonton Riverbend, Alberta

Richard Martel, CIIT, Member and MP, Chicoutimi—Le Fjord, Quebec

Wilson Miao, CIIT, Member and MP, Richmond Centre, British Columbia

Terry Sheehan, CIIT, Member and MP, Sault Ste. Marie, Ontario

Maninder Sidhu, CIIT, Member and MP, Brampton East, Ontario