

Dear Ms. Sgro,

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

Advance Paper Box Ltd. is submitting our comments and concerns to the Standing Committee on International Trade (CIIT) regarding the Canada Border Services Agency (CBSA) CARM project. As a significant player in the folding carton manufacturing industry since 1970, our operations are deeply integrated with international supply chains, relying heavily on both imports and exports. Hence, we are directly impacted by changes in Canada's border management and customs procedures.

We have been preparing for the CARM rollout scheduled for May 13, 2024, investing resources to adapt to the new system. However, like many in our industry, we remain concerned about the long-term efficacy of the CARM system for businesses heavily reliant on border crossings. The temporary measures implemented by CBSA to mitigate congestion at major crossings are welcome, yet they underscore the need for ongoing dialogue between CBSA and the business community to develop lasting solutions.

We align with the recommendations of the Canadian Association of Importers and Exporters (IE Canada) and the Canadian Chamber of Commerce, especially regarding the elimination of the Goods and Services Tax (GST) as an input tax credit for resident Canadian importers on the cost of acquiring a bond. This requirement places a significant strain on our cash flow and increases the operational costs, ultimately affecting our competitiveness.

We urge the CIIT to consider the unique challenges faced by manufacturers like Advance Paper Box Ltd. and to work towards modifications in the CARM project that facilitate rather than hinder international trade. We appreciate the opportunity to provide our input and are available to discuss our concerns and suggestions in further detail.

Respectfully submitted,

Yeti Biroue
CFO
Advance Paper Box Ltd.

About Advance Paper Box Ltd.

Founded in 1970, Advance Paper Box Ltd. is a leading manufacturer of folding carton packaging, serving a diverse range of industries across Canada and beyond. With a commitment to sustainability and innovation, our company supports numerous businesses in achieving their packaging goals. Our facilities, equipped with state-of-the-art manufacturing technology, enable us to meet high standards of quality and efficiency, ensuring we remain at the forefront of our industry.

Our address has changed!

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