

SUPPLEMENTARY OPINION OF THE BLOC QUÉBÉCOIS

The Bloc Québécois tabled this motion in light of the contradictory and alarming testimonies received by the Committee. We consider this suspension of the implementation of the Agency's Assessment and Revenue Management (CARM) system to be essential, in order to allow for a thorough study of the contradictions and concerns raised, and to prevent potential disastrous repercussions.

It should be noted that on March 19 and 21, 2024, motions requiring the Canada Border Services Agency (CBSA) to produce crucial documents were passed, and have still not been honored. The informations requested are essential to shed light on significant concerns and discrepancies, including system and company readiness, transition plans and the consequences of potential malfunctions during system activation. Of all the witnesses, only the CBSA and Deloitte, the company responsible for building the system, were reassuring about these aspects.

The brief dated April 8, 2024 mentioned in the motion is particularly troubling, especially as it is endorsed by 22 informed industry organizations¹, who report having received information that "contradicts statements made by CBSA before the CIIT" and reinforces their concerns that "CARM is not ready".

In particular, the brief reveals that "only 3 of 33 Trade Chain Partner participants have software that is fully certified", and mentions persistent errors in duty and tax calculations. Policy guidance around use of the importer's business number combined with the customs broker's Release Prior to Payment financial security are said to requires "thorough examination", and sectors critical to the economy, such as automotive and aerospace, "are confronting significant functionality forfeiture with CARM".

The urgency of putting the brakes on GCRA is real, as CADEX (the existing system) will be turned off on April 26, 2024. According to the signatories, a decision to delay the implementation date beyond this shutdown will result in significant challenges and "will be detrimental to trade, revenue cycles and importer cost allocation, as the importer will not have been billed or have access to their entries". Furthermore, the CBSA team confirmed to the signatories that a return to the previous system would be impossible, again contradicting its testimony in Committee. It is imperative that we refuse to sign this blank cheque.

¹ Canadian Association of Importers and Exporters (IE CANADA); Canadian Society of Customs Brokers (CSCB); Canadian Chamber of Commerce; Express Carrier Coalition Canada; Association of International Customs and Border Agencies (AICBA); Retail Council of Canada (RCC); North American Customs Brokers Alliance (NACBA); National Customs Brokers and Forwarders Association of America, Inc. (NCBFAA); Confederación de Asociaciones de Agentes Aduanales de la República Mexicana (CAAAREM); Northern Border Customs Brokers Association (NBCBA); Express Association of America (EAA); Canadian Association of Regulated Importers (CARI), American Chamber of Commerce in Canada (AmCham Canada); Canadian Produce Marketing Association (CPMA); U.S. Chamber of Commerce; Canadian International Freight Forwarders Association (CIFFA); Association of Home Appliance Manufacturers (AHAM); Canadian Federation of Independent Business (CFIB); National Foreign Trade Council (NFTC); Canadian Vehicle Manufacturers' Association (CVMA), Global Automakers of Canada, Automotive Parts Manufacturers' Association.