



CBSA Assessment and Revenue Management System (CARM): Overview of concerns from the frontline

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The following is provided to the House of Commons Standing Committee on International Trade with a view to assist the Committee in its study of the CBSA Assessment and Revenue Management System (CARM). It is intended as an overview of the concerns shared by Canada Border Services Agency (CBSA) officers and members of the Customs and Immigration Union (CIU) regarding both the potential impact of CARM on border operations and the fashion in which this new system is being deployed. What follows focuses primarily on the officer-side experience and is not exhaustive, as much has already been outlined by other organizations.

1. Lack of consultation

Until recently, CBSA management has made no effort to consult with the union representing Canada's border personnel regarding the implementation and possible ramifications of CARM. In April 2024, CBSA upper management eventually reached out to the union. A meeting between CBSA and CIU is set to take place in early May. This is far too late into the process for effective consultation regarding a system that will be deployed imminently, on May 13, 2024. It would have been far preferable for CBSA to approach the union well in advance of this date in order to work collaboratively.

2. Lack of training

Amongst frontline Border Officers, there appears to be a near universal consensus about the lack of sufficient training regarding CARM mere days before the system is set to be rolled out. As it stands, officers are being trained by other CBSA personnel who often have received little training themselves, or who have little experience with commercial operations.

In fact, there was little communication between CBSA and frontline staff until February 2024 following growing concerns from Border Services Officers. As a result, many questions remain amongst the people who will be tasked with assisting the public once CARM is officially launched.

By not ensuring that public-facing officers are trained properly, CBSA is basically discounting how the CARM roll out may affect those who will be using the new system. What happens if a mistake — one that could easily be avoided through proper training — is made? Errors can have a wide range of impacts on things such as schedules, money lost, and people's standing with CBSA, all of which can severely affect members of the public who conduct business with CBSA. The Agency has a responsibility to ensure its officers are properly trained and able to deliver services to the public.

3. Health and safety concerns

Under the new CARM system, Notices of Penalty Assessment (NPA) issued as part of the Administrative Monetary Penalty System (AMPS) will now be signed using the first and last name of the Border Services Officer issuing the NPA. This is a departure from previous practice, where



NPAs were signed using badge numbers. This could expose officers to potential harassment and threats, as it would be easier for disgruntled members of the public to track down officers — either virtually using official federal government email addresses or in person, especially in smaller communities.

4. Not designed with CBSA in mind

CARM was not designed for CBSA. It is based on an accounting solution originally developed for the Canada Revenue Agency, and little effort was made to properly adapt it for CBSA. As a result, the wording used in CARM is alien to the Agency. Officers who already have to contend with insufficient training also have to learn what amounts to an all-new language, further complicating the implementation of CARM.

This is not new for CBSA. The Agency has a history of attempting to adapt software developed for other organizations to suit its needs, with mitigated success. GCMS (Global Case Management System), originally used by IRCC (Immigration, Refugees and Citizenship Canada) springs to mind. Agency processes would certainly benefit from solutions developed in-house in consultation with those who use these solutions on a daily basis. Once again, CARM repeats a pattern all too familiar to border officers, where those who make decisions impacting the frontline are wholly disconnected from that same frontline.

5. General concerns

Unlike the system it is replacing, CARM will not let officers know about prior enforcement actions. This is a huge loss of information for officers. CARM is being pitched as a purely administrative tool, but its ramifications extend to the enforcement side of CBSA operations. This should be a source of concern as it weakens our ability to enforce laws and regulations.

Beyond the possible elimination of risk assessment tools for frontline officers, it also seems like CARM could reduce the number of meaningful interactions between officers and members of the public. These interactions are a crucial part of the work Border officers do to keep our communities safe.

Under the current system that CARM is intended to replace, depending on work locations, both law enforcement personnel and non-law enforcement personnel play a role. By focusing on the administrative aspect of CARM, CBSA sends a signal that it views the processes involved as indeed purely administrative, which could see non-law enforcement personnel assigned to tasks that should be performed by law enforcement personnel. This would be a mistake, given that part of what CARM is used for is not just administrative in nature but is connected in various ways to the enforcement work performed by border officers.

Adding to this, current IT infrastructure is being adjusted to accommodate CARM, removing existing functions essential to enforcement actions, such as retrieving client identification information – business numbers, carrier codes, etc. This is severely detrimental to the work of officers and could have been avoided given adequate consultation with the frontline.

We also have general concerns regarding the decision to implement CARM in the first place. It seems to follow the same patterns established by previous projects — notably ArriveCAN —



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where a rushed system is deployed as a solution to a non-existent problem. These projects often focus on modernizing the border through automation and facilitation at the expense of reliability and security.

Finally, the decision to have a two-week “blackout period” between the shutdown of the current system and the launch of CARM is puzzling at best. This alone is a source of significant uncertainty for frontline border personnel.

6. Conclusion

Given the concerns outlined above, it is the Customs and Immigration Union’s opinion that the implementation of the CARM system should be delayed until possible ramifications have been satisfactorily analyzed, and until proper training, developed following consultation with frontline border officers knowledgeable in the processes involved and in cooperation with the union representing these officers, has been provided to the personnel responsible for delivering affected services to Canadians.