

# CARM & COMPLIANCE READINESS FOR 2026

Empowering Infrastructure, Construction and Trade Projects Through Certainty, Control and Compliance



As Canada accelerates investment in infrastructure and trade, **CARM (CBSA Assessment and Revenue Management)** becomes more than a customs modernization program. It becomes a strategic advantage for contractors, project owners, importers and supply-chain partners.

CARM is a Government of Canada program modernizing how importers interact with the Canada Border Services Agency (CBSA). **CARM compliance** means that importers must:

- Register on the **CARM Client Portal (CCP)**
- Delegate authority properly (e.g., to customs brokers)
- Post their own financial security (surety bond or cash deposit)
- Pay duties and taxes electronically through CARM

**CARM compliance ensures importers can release goods, account for duties/taxes and remain in good standing with CBSA under the new digital system.**

Organizations that plan reduce risk, and secure stronger financial outcomes. Those who wait will face delays, compliance exposure, and costly disruptions, including potential storage and handling costs that were unforeseen or anticipated.



## WHY CARM MATTERS TO INFRASTRUCTURE, CONSTRUCTION & TRADE

### Projects Depend on Predictable Cross-Border Movement

Large-scale construction and infrastructure projects rely on a constant flow of materials: steel, machinery, electrical components, fabricated parts, modular units and more.

**CARM directly affects:**

- Material flow timelines
- Project budgeting considerations: tariffs, geopolitical disruptions, bankruptcies of suppliers, mergers and acquisitions impacts
- Risk allocation
- Bonding & surety requirements
- Vendor compliance and procurement standards: can they perform and meet your needs and expectations

With CARM's financial security requirements and real-time assessment model, importers must operate with **precision, documentation discipline and financial stability.**

### CARM is Now Central to Trade Compliance

**CARM changes how duties and taxes are managed:**

- Importers are now the **Importer of Record**, responsible for all declarations
- Real-time financial posting replaces legacy credit arrangements
- Every import is tied to your **Business Number (BN9)**
- Errors are visible immediately, and so are penalties
- **Audit trails are transparent and fully digital**

For industries handling complex supply chains like infrastructure and construction, this means **fewer places to hide errors and far more emphasis on proactive compliance.**

### Financial Security

#### Requirements Are Changing

Customs brokers can no longer use their own security.

Importers must provide:

- A bond or surety instrument, or
- A financial deposit

*This shifts risk and responsibility upstream, directly onto the importer.*

### Compliance Will Be Data-Driven

**CARM's analytics and audit capabilities mean CBSA will:**

- Identify valuation or classification inconsistencies quickly
- Flag repeated errors
- Issue penalties under AMPS without lengthy investigation

*Compliance must move from reactive to **built-in.***



## HOW TO PLAN & PREPARE NOW



### ASSESS YOUR IMPORT PROFILE

Understand:

- What you import
- Who imports on your behalf
- Where your documentation originates
- Duty exposure levels
- Current gaps in classification, valuation and origin data

*This is your baseline for risk.*



### STRENGTHEN INTERNAL CONTROLS

Implement:

- Documented SOPs for trade compliance
- A single-source repository for tariff classifications
- Standardized vendor and internal workflows
- Automated data checks where possible

*Reliable data is your strongest defense.*



### ALIGN BONDING & FINANCIAL SECURITY EARLY

- Prepare for financial security requirements
- Evaluate whether your bond capacity aligns with import volume
- Assess the impact of CARM on overall credit and project bonding

*Securing your line early protects project continuity.*



### TRAIN CROSS-FUNCTIONAL TEAMS

Not just customs teams, also:

- Procurement
- Logistics
- Finance
- Project managers
- Contractors and vendor partners

*Every stakeholder must understand their role in CARM compliance.*

## RISK MANAGEMENT FOR 2026 & BEYOND

### Key Risks

- **Import delays** due to missing security or portal access
- **AMPS penalties** from incorrect declarations
- **Project cost overruns** tied to classification/duty errors
- **Vendor non-compliance** affecting your own risk profile
- **Bonding capacity strain** if financial controls are not aligned

### Risk Mitigation Pathways

- Early bonding and financial security planning
- Pre-verification of all tariff classifications (especially high-value materials)
- Enhanced supplier compliance agreements
- Periodic internal audits
- Continuous monitoring of CARM updates and regulatory adjustments

**THE GOAL:** Zero surprises at the border and zero cost escalation due to customs issues.

## THE VALUE PROPOSITION: WHY YOU NEED A TRUSTED ADVISOR

CARM introduces complexity, but also clarity and opportunity. With the right preparation, companies gain:

- **Faster border clearance**
- **Reduced project risk**
- **Improved cash flow visibility**
- **Audit-ready compliance**
- **Greater confidence for project owners, lenders and sureties**

*As a strategic partner, we help organizations transition smoothly into CARM's requirements, turning a regulatory shift into a competitive advantage.*

**Our ability to introduce trusted customs broker expertise across Canada through our ecosystem enables clients to access the right compliance support and resources, helping them proactively manage risk and address the growing complexity of global trade.**



To learn more about how American Global can help:

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