



May 27, 2009

CIFFA Export Examinations Working Group

In attendance :

Chris Gillespie – Gillship Navigation
Elvio Lancione - ECU Lines
Ed Luft - LCL Navigation
Vince Monaco – Shipco
Nick Karabineris – Odyssey Shipping
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A brief recap of the suggestions discussed, with the intention that CIFFA bring them to CBSA's attention. In order to provide a more effective and efficient export examination system in Canada, the following recommendations are proposed.

Inspections:

- Focus on "point of loading" for export consol reporting and interdiction.
 - Examine goods at the freight forwarder's warehouse before they are loaded into a container for export.
- Identify the CARRIER by the name and bond number shown on the B-13A, and have all CBSA interdiction initiated through that party
 - The carrier may be the NVOCC/ freight forwarder who issues a Bill of Lading. Identification is by name and 8000 series carrier code
- All NVOCC's to inform shippers/co loaders that they are to ensure the use of the NVOCC's name and bond number are on export declarations (CAED or B-13a) filed for their bookings.
- Export Declaration filing 'cut-off' 48 hours prior to loading the container at the "inland point". All NVOCC's required to comply on multimodal moves.
 - This will allow CBSA time to risk assess/ review the Export Declaration and examine at the freight forwarder's warehouse BEFORE the container is loaded.

Export Declarations:

- Manual B13A Filing – To be eliminated altogether (the sooner the better) - Electronic CAED submissions only.
 - No more stamping systems at ports. The US has made their export declarations (AES) electronic why can't Canada?

No Declaration Required (NDR) Filings:

- Consider eliminating all or some of the NDR as these are viewed as “loopholes “ which only invite greater scrutiny by the CBSA and lead to high rate of examinations
- Personal Effects Shipments:
 - Attract a high degree of examination
 - Suggestion is to eliminate the exemption under NDR # 3, and require that all personal effects shipments be subject to an Export Declaration (B13A).
 - Equally it is proposed that the CBSA provide a process to send a copy of the EXPORTER'S passport (if a foreign citizen) as a mandatory requirement with a copy of the Export Declaration (B13A), by fax or e-mail to be submitted within the same time-parameters as the Export Declaration (B-13A) itself, or
 - That the passport number of the exporter (if a Canadian citizen) be included in the Export Declaration (B-13A). (Perhaps instead of an Exporter BN in that space on the B13A)
- Those NDR shipments that remain as NDR's would equally be addressed as personal effects or In Bond/ In - Transit shipments below.
- Personal Effects , included in above and in addition the shipper's (actual exporters) passport information is to be provided during the POR process

In Transit or In Bond Cargo:

- Greater scrutiny required at the point of entry in order to minimize problems after the fact
- Documentation & Forms need improvement for greater disclosure of information (e.g. A8A's - purpose of temporary entry , actual shipper & consignee info etc), as it was observed that in many cases the domestic transporters are not completing the documentation properly and Customs does nothing to curtail flawed paperwork.
- Long term goal – Electronic filing
- Here the issue is USA origin goods in particular, previously addressed under NDR 9! Again we would propose that such goods be advised to customs in the same manner as we propose for personal effects with the same time parameters. In this case the documents submitted could include a copy of the A8A & commercial invoice.

CBSA:

- Adopt a more preventative approach and conduct inspections of goods at origin, prior to loading (versus reactionary position of stopping container at port of exit) which is disruptive , expensive and hinders the flow of goods – not to mention in the case of consolidation , punishes numerous exporters in one fell swoop during their attempt to scrutinize one shipment.
 - Resolved by adopting an 'INSPECT at POINT OF LOAD' approach.
- CBSA should create a Hotline or Portal/Site whereby information can be lodged in advance of loading for the scrutiny and/or prior clearance (i.e. In Transit cargo /docs, Information on Personal Effects or any other suspect shipment information whereby the freight forwarder/consolidator may have doubts).
- To drive improved cooperation & transparency, the CBSA should look to the 8000 series holder as a source of information & assistance.
- CBSA should create a national contact list and make themselves more visible (accessible) to the community.
- CBSA should introduce performance and communications standards on export examinations, sharing data such as # of examinations, # performed at point of loading, # performed at port of lading, days delay, costs, etc.

Proposed Export “On Hold Reports “

- Agreed that consolidators (NVOCC) would start keeping a record of CBSA exams and send to CIFFA
- We drafted two “on hold” report formats (attached) that we would suggest CIFFA provide to members to feedback information on shipments on hold so that customs really can grasp the extent and scope of the problem.