

Trade Chain Partner Working Group (TCP WG)

DRAFT – FOR DISCUSSION PURPOSES ONLY

April 27, 2023



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Agenda

| Topic | Speaker | Timing |
|---|-------------------------------------|-------------------|
| Opening Remarks | Mike Leahy | 9:00AM – 9:10AM |
| Walkthrough/Presentation of Duties and Taxes Calculations | Kerri-Anne Whittaker | 9:10AM – 10:40AM |
| Break | | 10:40AM – 10:50AM |
| CCP Onboarding Strategy and Plan | Darren Uchman | 10:50AM – 11:10AM |
| CARM Experience Simulation Update | Kristin Billey / Geri-Lynn Lidstone | 11:10AM – 11:30AM |
| Industry Consultation | All | 11:30AM - 12:15PM |
| Q&A / Conclusion | All / Mike Leahy | 12:15PM - 12:30PM |



Opening Remarks



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Walkthrough of Duties and Taxes Calculations

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CARM Duties and Taxes and Calculation



CES Findings – Duty and Tax Calculation



Duty and Tax Calculations – CES Findings

- Special CBSA Program Requirements updates
 - Some codes are changing formats or fields (e.g. CIRO submissions)
 - Policy changes and guidance is forthcoming from the OPIs

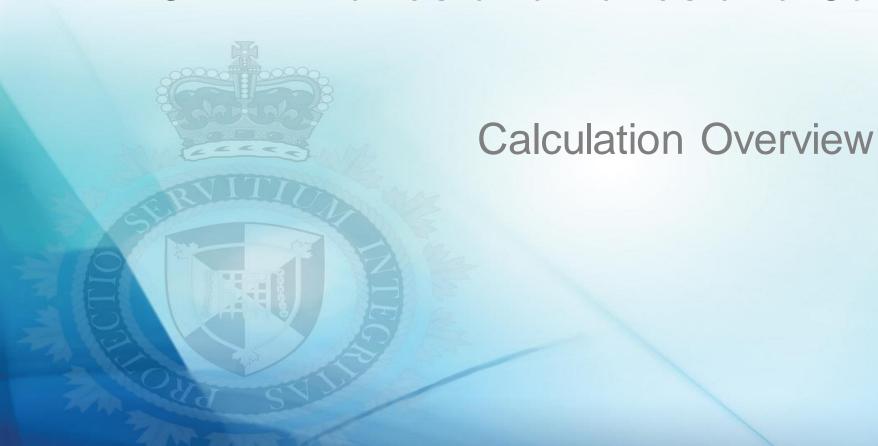


Duty and Tax Calculations – CES Findings

- GST Applicability system code was incorrectly applied
 - The code was updated retroactively and an update added to prevent future occurrences
- Missing Remission Orders
 - Orders identified by CES participants were created manually
 - CBSA is identifying an additional OPI for review of the remaining orders to approve their conversion into CARM
- Used Goods Calculation
 - This portion of the calculation is to eventually be removed from CARM



CARM Duties and Taxes and Calculation



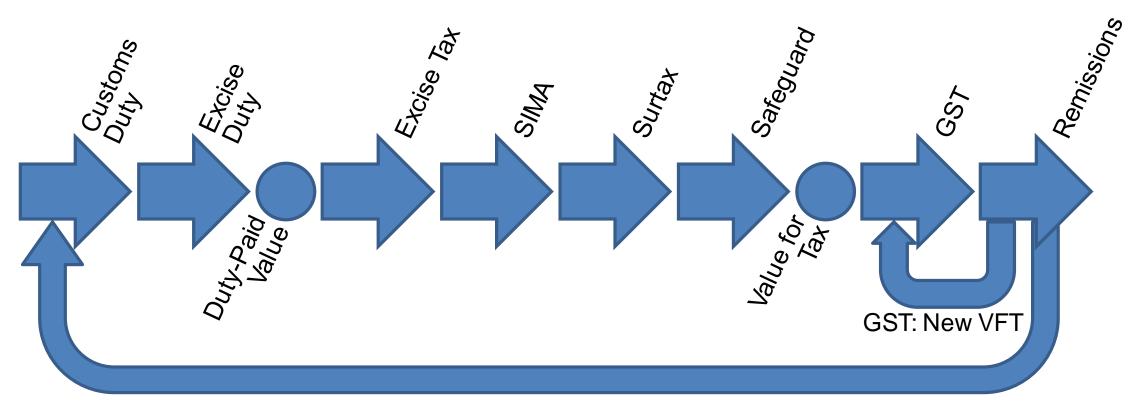


About the Duties and Taxes Calculation Engine

- Calculates all Federal amounts (Customs Duty, Excise Duty, Excise Tax, Countervailing, Anti-Dumping, Safeguard, Surtax, GST)
 - Calculated, Remission, Net amounts
- Same Calculator for CCP, API, CAD Submission
- Only difference is available fields
 - API does not include SIMA preferential values (only standard country rates)
 - CCP does not include SIMA, date selection
- Based on control data maintained by the CBSA



Overall Process



Customs Duty: New Trade Agreement



CCS and CARM – Calculation Similarities

- "Excise Tax" field may be used for both Excise Taxes and Excise Duties
- Provincial amounts remain self-declared
 - No formulas or remissions
 - Automatically added to total Duties and Taxes
- Formulas are based on equivalent CCS formulas
 - Extensive testing for agreement between CCS and CARM results
- No interactions between Duty and Tax Types in Remission Formulas
 - Exception: GST New Value for Tax
 - Impact: CARM does not support a scenario where New VFT is applied in addition to 1/X Remission
 - (e.g. If Customs Duty is relieved at 100%, 1/60 GST remission is based on pre-Remission GST amount)



CCS and CARM – Submission Differences

CCS

- TCP Submission includes a declared amount; CCS performs the calculation to verify the submission within a tolerance
- Customs and Excise Duty are combined
- Excise Tax amount is submitted
- GST Rate is submitted

- Submission does not require a declared amount in most circumstances
- Customs Duties and Excise Duties are separate fields
- Excise Tax Code is submitted to derive rate and calculation result
- GST Code is submitted to derive rate and calculation result



CCS and CARM – Submission Differences

CCS

 Quantities must be declared in the appropriate unit of measure

 SIMA, Surtax, Safeguard are a single, self-declared field

- Quantities may be declared in any unit of measure within the appropriate dimension
 - "Alcohol %" helps convert between LPA (Litres of Pure Alcohol) and LTR (Litres)
- SIMA, Surtax, Safeguard are calculated separately
 - Additional fields required to support the calculation



CCS and CARM – Special Authority Differences

CCS

 Special Authority field is used for OIC and Duty Relief License, plus other uses

- Separate fields for OIC and Duty Relief License
 - Larger reduction is automatically granted for each duty and tax type
- Remission amounts calculated and provided as a separate result
- Additional field for Permit (Not used in calculation)



CCS and CARM – Rounding Differences

CCS

- "Successive" rounding
 - Amount is calculated at 6 decimal places
 - Result is rounded to 5 decimal places;
 result of this rounding is re-rounded to
 4, then 3, then 2 decimal places, which is saved
- Un-rounded carry-through
 - Where an amount is required for a subsequent calculation (e.g. Customs Duty → GST) the unrounded amount is used

- Direct rounding
 - Amounts are stored internally at 5 decimal places
 - Results are rounded directly to 2 decimal places for transmission and display
- Rounded carry-through
 - Rounded transmitted/displayed amounts are used for subsequent calculations



CARM Duties and Taxes and Calculation Document

Document Overview



Document Contents

- Section 2: Common Formulas and Algorithms
 - Unit of Measure Conversion
 - Currency Exchange
 - Rounding Rules
 - Calculation Inputs and Outputs

- Section 3-8: Formula/Algorithm Details for each Duty and Tax Type
 - Customs Duty
 - Excise Duty
 - Excise Tax
 - SIMA Anti-Dumping and Countervailing
 - Surtax
 - Safeguard
 - GST
- Section 9: Formula/Algorithm Details for Remissions



Document Appendices

- Appendix A: Duty and Tax Calculation Examples
 - Values were designed for mathematical demonstration purposes only
- Appendix B: Glossary of Acronyms
- Appendix C: Business Glossary
 - Matches ECCRD
 - Includes only fields important for calculation
- Appendix D: Code Lists
 - D.1 Excise Tax Codes
 - Includes calculation type and Duty/Tax Indicator
 - D.2 Units of Measure
 - Includes dimension and conversion rate into base unit of measure



Common Calculation Types and Formulas

- Free
- Accept
- Ad-Valorem (Based on Value)
 - Duty/Tax Amount = Value * Ad Valorem Rate
 - Value → Value for Duty, SIMA Export Price, Duty-Paid Value, Value for Tax
- Specific (Based on Quantity)
 - Duty/Tax Amount = Quantity * Specific Rate
 - Quantity → Import Quantity, SIMA Quantity
- Advanced Calculations for Customs Duty
 - Ad-Valorem with Specific Minimum and/or Maximum comparisons
 - Specific with Ad-Valorem Minimum and/or Maximum comparisons
 - Sum of Ad-Valorem and Specific amounts



Quantity Conversion (Section 2.4, Appendix A2)

- Declare quantity in any unit of measure in the appropriate dimension
 - Weight, volume, units, etc.
- CARM will convert into the Standard unit (specified unit in the Tariff Book, Excise rate, Measure In Force, Surtax, Safeguard) with the following formula

$$- Quantity_{Standard} = Quantity_{Input} * \frac{Rate_{Base/Standard}}{Rate_{Base/Input}}$$

LPA Conversion for Alcohol also uses the Alcohol % field

$$- Quantity_{LPA} = Quantity_{Input} * \frac{Rate_{Base/Standard}}{Rate_{Base/Input}} * Alcohol \%$$

$$- Quantity_{Standard} = Quantity_{LPA} * \frac{Rate_{Base/Standard}}{Rate_{Base/LPA}} \div Alcohol \%$$



Excise Duty using Excise Tax Framework (Section 5, Appendix A5)

- The use of some Excise Tax codes results in an Excise Duty applied
 - Excise Duty is used when a duty rate maps "cleanly" to a commodity code (i.e. commodity code → single rate of excise duty)
 - If multiple imports in the same commodity code can incur multiple rates, the excise tax framework is used
 - Additional Duty on Cigars: Additional duty is based on "Duty-Paid Value" which requires
 the Excise duty to be applied first and used as a basis for the subsequent calculation
- For CAD submissions, the results appear in the correct location on the accounting documents and statements of accounts
- This is the same as CCS



Remissions Formulas (Section 9.0, Appendix A12)

| Remission Formula Type | Additional Input | Net Amount | Remission Amount |
|--|---|---|--|
| Specified % Reduce by a set percentage | OIC/DRL: Percentage | Calculated Amount * (1 – Specified %) | Calculated Amount * Specified % |
| 1/X Based on Time Limit From and Time Limit To dates. Any part of a calendar month is a full 1/X (Similar formulas for 1/50, 1/60, 1/100, 1/120) | Calculation Entry: Time Limit From, Time Limit To | Number of months = Year and Month (Time Limit To) – Year and Month (Time Limit From) + 1 Calculated Amount * (Number of Months / X) | Calculated Amount — Net Amount |
| Spirits – Excise Duty only Excise Duties Net Amount is set to 0 n.b. NOT Excise Duties that use the Excise Tax framework | | \$0 | Calculated Amount (grant full remission) |
| New Trade Agreement – Customs Duty only Recalculate the customs duties with a set trade agreement | OIC/DRL: Tariff Treatment | Customs duties recalculated using the retrieved TariffTreatment in the OIC/DRL | Calculated Amount – Net Amount |
| New Value for Tax – GST only Recalculate GST based on net amounts instead of the calculated amounts | | Value for Duty + Net Customs Duty + Net Excise Duty + Net Excise Tax + Net Countervailing + Net Anti-Dumping + Net Surtax + Net Safeguard + Provincial Cannabis Tax | Calculated Amount – Net Amount |
| Accept Self-declare the Net Amount | | Self-Declared Amount | 0 |



CARM Duties and Taxes and Calculation Document

Common Questions



Common Questions – Rounding

- Rounding is different between CCS and CARM
 - This is to your advantage in most situations
 - CCS rounds up from 0.004445, CARM rounds up only from 0.005000

CCS: 0.004445 CARM: 0.004445

- Differences between CCS submissions and calculation results had a tolerance of \$2.00,
 which accommodated rounding differences between client systems and CCS
- I see a rounding difference on the [GST or Remission] calculation
 - Make sure to use the rounded amounts from prior calculations



Common Questions – Excise

- Why is the system not calculating Excise Duty and making me use an Excise Tax code?
 - Excise Duty is used when a duty rate maps "cleanly" to a commodity code (i.e. commodity code → single rate of excise duty)
 - If multiple imports in the same commodity code can incur multiple rates, the excise tax framework is used
 - This is the same as CCS
- For my alcohol submission, I can just declare a lower-rate Excise Tax code than what I should
 - This is the same as CCS
 - In the future, CBSA may add additional controls on this field
 - All submissions are subject to compliance verification and enforcement action



Common Questions – SIMA

- How can I find out my importer/exporter-specific information?
 - Some SIMA information is public (e.g. country rates)
 - Most exporter-specific information is privileged: Normal Values, model IDs, Export Price deduction rates
 - Contact your cooperative exporter or the CBSA SIMA group, who can provide this information on a need-to-know basis
- Why has my submission defaulted to the country rate?
 - To protect privileged information, CARM does not return errors if a Model ID is invalid, so the Exporter ID and Model ID must match CARM control data precisely
- I have an agreement to use a unique method of calculating SIMA for an import
 - Contact the SIMA group to discuss how your particular situation is set up in CARM



Common Questions – Remissions

- I'm trying to use a license that is neither an OIC remission order nor a Duty Relief License
 - In CARM, the available categories are Remission Orders and Duties Relief Licenses
 - All usable codes will be grouped under one of these categories
 - E.g. EOPS authorizations are grouped with Duties Relief Licenses
- My [Duty and Tax Type] result did not take into account the remission of [Other Duty and Tax Type]
 - The only remission formula that takes a different Duty or Tax type into account is the GST: New Value for Tax, which considers the post-remission net amounts for all other Duty and Tax types



Break









CCP Onboarding Strategy and Plan



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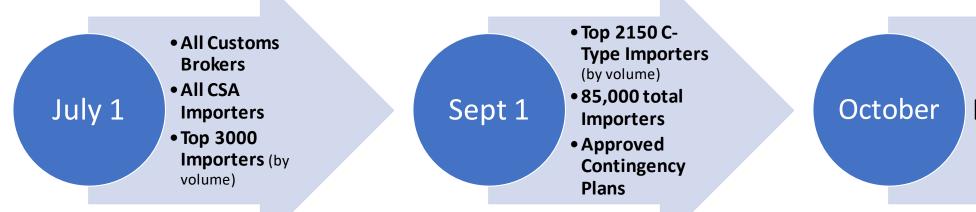


CCP Onboarding Strategy

<u>Purpose</u>

 Provide an overview of the strategy to onboard key client groups on the CARM Client Portal (CCP) to support a successful Release 2 implementation in October 2023

Onboarding Targets







Current CBSA Clients and Volumes

Total Transaction Volumes

- May 2021-Apr 2022 221,637 clients performed 32,198,908 transactions*
 - 61,774 clients averaged at least 1 transaction/month
 - ~85,000 clients transact in a given month

C-Type Volumes

- 2021 18,643 clients performed 140,019 C-type transactions
 - 2,150 clients averaged at least 1 transaction/month (73% of total C-type transaction volume)

| Importers ranked by transaction volumes | Total Transaction Volume % |
|---|-------------------------------|
| #1-3,000 | 80% |
| #3,001-10,000 | 11% |
| #10,001-100,000 | 8% |
| #100,001-221,637 | 1% |

^{*}Transaction volumes extracted from CCS



Current CCP Clients and Volumes

- As of April 19, 2023, CARM communication and engagement activities have led to 29,015 TCPs registered on the CCP
 - Customs Brokers, Trade Associations, and CARM Working Group Members are key channels to amplify messages to TCPs
- 29,015 TCPs registered on the CCP account for 73% of total transaction volumes*

^{*}based on data from May 2021-April 2022



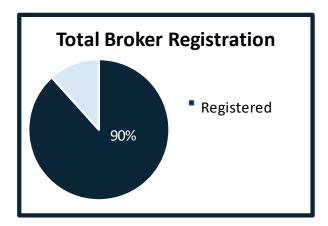
Customs Brokers

Landscape

- 300 licensed Customs Brokers
 - 90% (270/300) of all brokers are currently registered on the portal

Target

100% of Customs Brokers on the portal by July 1, 2023



Engagement Approach and Activities

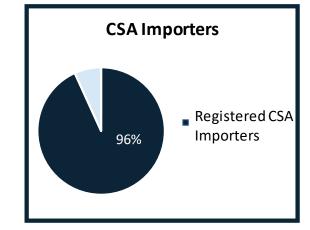
Direct outreach to remaining 10% of unregistered Customs Brokers is underway



CSA Importers

Landscape

- 103 CSA importer participants
- 96% (99/103) of all CSA importers are currently registered on the portal
- CSA clients represent 35% of total transaction volumes



Target

100% of CSA Importers on the portal by July 1, 2023

Engagement Approach and Activities

- CCSH has reached out directly to 4 outstanding CSA importers to offer support with onboarding
- CARM Stakeholder Engagement to work with Trusted Trader team to connect directly with outstanding CSA importers to understand onboarding challenges as required



Top 3000 Importers (by volume)

Landscape

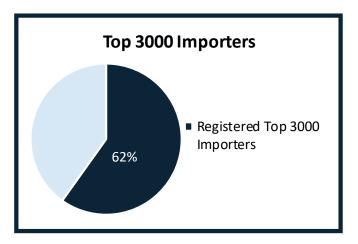
- Top 3000 importers account for 80% of transaction volumes
 - 62% of the Top 3000 importers (by volume) are currently registered on the portal

Target

100% of Top 3000 Importers registered on the portal by July 1, 2023

Engagement Approach and Activities

Details on next slide





Road to Onboarding Top 3000

Activities and Outreach

High Impact Activities

- 1. Toolkit Outreach:
 - Email CARM Awareness toolkit to associations from key industries/sectors represented in top 3000 Feb-May 2023
- 2. Outreach through Brokers/Couriers:
 - Collaborate with Brokers/Couriers to engage their clients Apr-Jun 2023

Target Outreach Activities

- 3. Direct Outreach to top 3000:
 - Contact remaining top 3000 Importers directly to encourage CCP registration May-Jun 2023

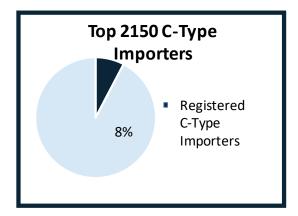
Objective: Onboard unregistered Importers through High Impact Activities to reduce direct outreach needed for Targeted Outreach Activities.



Top 2150 C-type Importers (by volume)

Landscape

- In 2021, 18,643 clients performed 140,019 C-type transactions
- 2,150 clients averaged at least 1 transaction/month
 - Account for 73% of total C-type volume
 - 8% of the Top 2150 C-type importers (by volume) are currently registered on the portal



<u>Target</u>

100% of Top 2150 C-type importers on the portal by September 1, 2023

Engagement Approach and Activities

- POE Material: Display CARM Awareness Poster and provide CARM Handouts at Ports of Entry (March/April)
- E-Longroom Messaging: Include attachment or CARM signature block in E-Longroom correspondence to C-type Importers
- CFIB and Chambers of Commerce Outreach: Engage small and medium enterprises through CFIB & Chamber of Commerce activities (webinars, awareness toolkits, social media, etc.)
- **Brokers:** Work with brokers who serve C-type clients to encourage portal onboarding



Remaining Small / Medium Importers

Landscape

- Small and Medium sized importers represent the largest client group
 - Top 10,000 = 91% of total transaction volumes
 - Top 100,000 = 99% of transaction volumes
- ~85,000 clients transact in a given month
 - 159,863 clients (72%) submit a transaction less than once a month on average
 - 81% of total C-type clients import less than once every two months on average

Target

85,000 total Importers onboarded by September 1, 2023

Engagement Approach and Activities

- TCP Associations and GoC Partners: Communication and 1-pagers for associations and online information distribution (e.g. CRA)
- **POE Material:** Display CARM Awareness Poster and provide CARM Handouts at Ports of Entry (April/May)
- *E-Longroom Messaging:* Include attachment or CARM signature block in E-Longroom correspondence to C-type Importers
- **CFIB and Chamber of Commerce Outreach:** Engage small and medium enterprises through CFIB & Chamber of Commerce activities (webinars, awareness toolkits, social media, etc.)
- CBSA Website & Social Media: Updating CBSA Website to highlight CARM and clearly direct TCPs to content and materials, greater presence on CBSA social media



CARM Awareness POE Materials

To raise awareness:

- To raise awareness directly at the Ports of Entry with C-Type clients and all clients.
- Posters and hand-outs will be available in May 2023 across Canada.



CARM Hand out



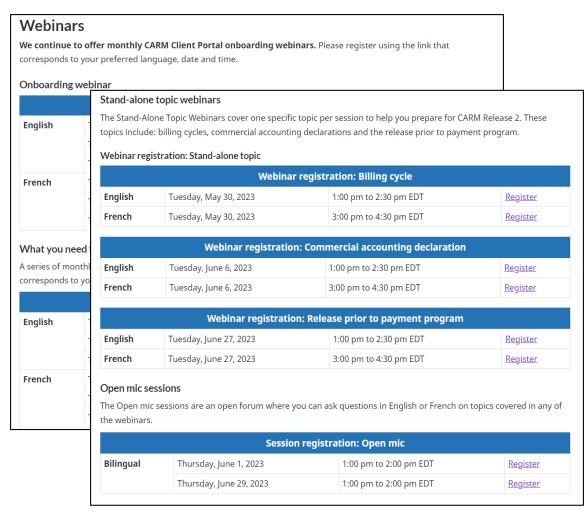
CARM Poster



Webinars will be delivered in Spring 2023 to support TCPs

- Onboarding and What You Need to Know With CARM Release 2 Webinars will continue monthly.
- A new series of Stand-Alone Topic Webinars:
 - Billing Cycles
 - Commercial Accounting Declaration
 - Release Prior to Payment.
- Webinar schedule and registration links can be found on the <u>CARM Client Portal</u>.







CARM Experience Simulation Update

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CES Update

✓ Completed CES Dry-Run

- The CES Dry-Run ran from February 6th to 24th with 1 external TCP.
- The Dry-Run revealed opportunities to improve CES support capacity & processes, enhance educational material, and address issues related to reference data.

✓ Completed Sprint 1 "Portal Fundamentals"

- Sprint 1 ran from February 27th to March 24th and included 11 external TCPs.
- Participants were able to perform the majority of their planned Portal simulation processes; however, issues discovered during the dry-run related to reference data gaps persisted, and negatively impacted the participants experience and ability to complete all planned actions.
- Often there were technical and policy-related questions posed by TCPs during touchpoints that could not be answered by CES core team.
- An action plan was created to analyse the root cause of the priority incidents discovered during Sprint 1, and develop remediation actions.
- Further, Subject Matter Experts were on boarded to help address TCP questions during touchpoints.

✓ Started Sprint 2 "Portal Enhanced"

- Sprint 2 ran from March 27th to April 21st and included 29 external TCPs.
- Overall participants were highly engaged and regular touch points proved beneficial to encourage open dialogue and joint troubleshooting; summary of Sprint 2 lessons learned under development.

✓ Started Sprint 3 "Portal + EDI & API" and Sprint 4 "Portal + EDI & API" connectivity testing

- Sprint 3 began on April 24th and while 48 TCPs were expected to join Sprint 3, uptake is slow. Targeted outreach underway.
- In parallel, Sprint 4 connectivity testing began on April 24th.



Sprint 1 Lessons Learned

Perspectives on the Sprint 1 – Portal Fundamentals experience were gathered during the last week of the sprint through a post sprint survey and lessons learned session.

Key TCP Observations

- Participants would benefit from a more structured approach to help them understand the activities they should focus on simulating each week.
- Many participants felt the duration of the sprint was too short.
- The overall support from the CES team was well structured and appreciated; regular touchpoints were valuable, though often technical and policy-related questions could not be answered during touchpoints and required follow-ups.
- Participants would benefit from increased visibility on the status of outstanding questions and action items, known system is sues, and challenges other
 participants were experiencing.
- Participant experience was negatively impacted by reference data gaps.
- Participants would benefit from additional educational products & communications on Delegation of Authority and visibility attributes.
- Participants are looking for additional educational support, including more opportunities to engage directly with CARM experts (e.g., demos and walkthroughs, Q&A sessions etc.).



Upcoming CES Milestones

| Activity | Target Completion Date |
|--|------------------------|
| Start Sprint 4 | May 22, 2023 |
| Conclude Sprint 3 and lessons learned | May 26, 2023 |
| Conclude Sprint 4 and lessons learned | June 23, 2023 |
| Conclude CES close-out and overall lessons learned | July 14, 2023 |



Industry Consultation



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| Торіс | Question / Concern | Update / Next Steps |
|------------------------------|---|---|
| CARM Client Portal Issues | CCP logon issues. Challenges with exact information matching for onboarding (e.g., accents, full names, etc.) Broker DOA Extract – industry ask is for regular access to extract Playbook required for CARM portal; portal screenshots and associated detail with how to use those screens. Illustrating cancelled CAD's, BCN changes etc., Delegation of authority granularity – concerns over the way the delegation is granted and cannot be segmented (i.e., importer chooses to only provide customs broker authority to submit a CAD). Rulings module visibility issue. Brokers/consultants losing access/visibility to original submissions and subsequent decisions of CBSA. | CARM to connect with CCSH on details of tickets logged. Determine if further changes to onboarding information requirements can be accommodated. Determine if Broker DOA Extract needs to be produced more than one time prior to R2 Go-Live. R2 Playbook drafted and in review. Changes to DOA may be considered post R2. No change. Rulings visibility based on DOA. |
| EDI | Challenges with having to refer to multiple documents. Outstanding DCT Issues and Defects. CAD (printable document) requires exchange rate and duty rate data elements. | CARM to look into technical document consolidation. Outstanding DCT Issues/Defects to be shared with DCT participants. CARM to investigate data elements not on printable CAD (Exchange rate, duty rate). |

| Торіс | Question / Concern | Update / Next Steps |
|-------------------------------|---|---|
| Express Couriers – E-Commerce | What is the plan? Issues still outstanding. Impacts to proposed Bill C-19 change. Need to have casual BN numbers. Provide option for carrier/broker to submit line item detail with transmission to eliminate need to provide recap. How is the subset recap submitted? | CLVS Working Group sessions to be held to address outstanding concerns. Next CLVS Working Group session will be held following the May 2023 IOR industry consultation. |
| CSA | Many open items and new policy proposals (V Types). | A number of CSA Working Group meetings held to discuss changes for CSA participants under CARM. Next CSA Consultation Meeting is scheduled for April 27 th . |
| Temp Imports | Status update for Temporary Imports (registered Trade Shows) | The status update for temporary importations is part of the broader CBSA/TCP discussion on IOR. There are planned consultation sessions on this in May, followed by broad communication. |
| CBW | Inventory count concerns | Inventory count options being tested in CES. Broader engagement activities to occur with CBWs and Customs Brokers. |



| Topic | Question / Concern | Update / Next Steps |
|---|---|--|
| Operational Workflow | Ask for more walkthroughs of real-world scenarios. | CARM to work with WG members to prioritize walkthroughs. |
| Regulatory Package | Respecting "Cabinet Confidence" need to have visibility and understanding of the main components of these changes including timelines. What will be the difference under the Customs Act between a correction and an adjustment? What will be the legislative authority for corrections? How do we appeal if CBSA is making the calculation and we are no longer self-declaring duties and taxes? | Aim is to seek approval of regulatory changes at June 2023 Treasury Board meeting. This is not a regulatory change. |
| Enterprise Risk and Corporate Security | Industry continues to express concerns utilizing AWS platform and not government cloud farm. Requesting assurance CBSA can protect data. Acknowledge receipt of updated fact sheet. Playbook required outlining how CBSA and Deloitte will manage Enterprise Risk and Corporate Security. Business Continuity/Resumption Processes. What is the business continuity plan? Communication Outreach Strategy: What is the plan to notify TCPs when there is a breach of information? Proposed Changes to CARM CCP Terms and Conditions. NDA (Non-Disclosure Agreement) for Deloitte and Accenture for CES participants. | Presentation was provided January 2022 and is available on CARM Google Drive. In a future session, an update will be provided on business continuity. Will be included in business continuity discussion. No changes currently planned. NDA is covered under contractual agreement. |

| Topic | Question / Concern | Update / Next Steps |
|--------------------|---|--|
| Communication Plan | Would like to see the current plan; specifically, what has been completed and what is planned for future, with proposed roll-out | Engagement Plan shared at April TCP WG meeting and currently being executed. |
| | dates. | Updates on engagement activities will be provided at upcoming WG sessions. |
| CBSA Coordination | Need to ensure not overlapping of meetings with other CBSA meetings and events. Can we establish a reasonable advance notice criteria? | We continue make best efforts to work around other CBSA meetings and events. We are looking to re-establish monthly cadence for WG sessions. Invitations to be sent shortly for May and June WG sessions. |
| RPP | Release Prior to Payment Privilege. | RPP Transition Plan shared at March WG session. RPP Transition Plan FAQ shared with industry. |
| Payment Process | | |



Questions and Answers



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Thank You!

For more information:

- Visit the <u>CARM section of the CBSA website</u>
- Visit the CARM Client Portal
- Visit the <u>CARM Google Drive</u> for resources
- Join the <u>CARM LinkedIn Group</u> for the latest news
- Questions? Email: <u>CBSA.CARM_Engagement-Engagement_de_la_GCRA.ASFC@cbsa-asfc.gc.ca</u>
- Join the email distribution list by emailing
- <u>CBSA.CARM_Engagement-Engagement_de_la_GCRA.ASFC@cbsa-asfc.gc.ca</u>





