



Memorandum D17-2-3: Business Number Changes and Commercial Accounting Declaration Withdraw Requests

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This memorandum outlines the procedures to be followed by importers, or their authorized representative, when requesting an importer business number change on an interim accounting declaration or a Commercial Accounting Declaration (CAD), as well as the procedures for submitting a CAD withdraw request.

The contents of this memorandum may not conform to all accessibility requirements.

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Updates made to this D-memo

This memorandum has been revised to reflect changes resulting from the implementation of Release 3 of the CBSA Assessment and Revenue Management (CARM) project, including:

- a) The replacement of Form B3-3, Canada Customs Coding Form, and Form B2, Canada Customs - Adjustment Request, with the Commercial Accounting Declaration (CAD).
- b) Changes to the submission process when requesting a business number change on an accounting declaration, including the requirement to submit the request electronically through the CARM Client Portal (CCP).
- c) The ability to submit a CAD withdraw request through the CCP, under certain circumstances.

Definitions

Business number (BN)

For the purposes of this memorandum, the 15-digit Canada Revenue Agency registration number. It is made up of the nine-digit business number and a six-digit alpha-numerical number used to uniquely identify businesses' import/export (RM) accounts.

Business number change

A process within CARM, that cancels a submitted declaration with an incorrect business number, while triggering the automated posting of the CAD on the correct business number.

CARM Client Portal (CCP)

A self-service online tool that facilitates the accounting and revenue management processes with the CBSA.

Commercial Accounting Declaration (CAD)

The customs document used to account for goods imported into Canada after CARM Release 3. It acts as a single accounting declaration record for the goods, and all adjustments are processed as subsequent versions of the declaration.

Customs broker

An individual, partnership, or corporation that acts as an agent to transact business with the CBSA on behalf of the owner or importer of goods. While for most purposes, any agent may represent a client when transacting business with the CBSA, only a licensed customs broker may account for goods and pay duties under section 32 of the [Customs Act](#) as the agent for the owner or importer of the goods.

Electronic Data Interchange (EDI)

A service that allows clients to electronically transmit their import or export data and payments to the CBSA.

Form B3-3, Canada Customs Coding Form (Form B3)

The customs document that was used to account for goods imported into Canada prior to the implementation of CARM Release 3.

Interim accounting

A method of accounting to obtain the release of goods by importers with Release Prior to Payment (RPP) Privileges. Subsection 32(2) of the *Customs Act* makes it possible to grant the release of goods before the final accounting, based on the submission of prescribed minimum documentation. Release is granted on the condition that certain requirements are met, that a Commercial Accounting Declaration will be presented and that duties and taxes will be paid within the prescribed timeframes. Financial security must be posted in order to use this interim accounting process. Duties and taxes must be paid no later than 10 weekdays (defined as Monday to Friday, inclusive of holidays) after the 17th of the calendar month.

Pre-CARM “As Declared” CAD

A CAD that is created in the CARM system for goods that were accounted for on a Form B3 before the implementation of CARM Release 3. It replicates the accounting information found on the Form B3, and any subsequent adjustments, and must be created before an adjustment can be submitted in CARM.

Reason code

The code provided in CARM when making a change to an accounting declaration, which corresponds to the applicable legislative issue and reason for the request (e.g. R2-74-1-E.TC is provided when requesting a refund as a result of a tariff classification change).

Trade Chain Partner (TCP)

For the purposes of this memorandum, the entity who is submitting the adjustment request, which may include the importer or their authorized representative.

Guidelines

1. Section 7.1 of the [Customs Act](#) (the Act) requires that all information provided to an officer in the administration or enforcement of the Act, the [Customs Tariff](#), the [Special Import Measures Act](#) (SIMA) or under any other Act of Parliament that prohibits, controls or regulates the importation or exportation of goods be true, accurate and complete. As such, if an importer or their authorized representative discovers that the importer business number provided at the time of release or on an accounting declaration is incorrect, the CBSA must be notified of the error.
2. For the purposes of this policy, the company whose business number is identified as the importer at the time of release will be considered to be the importer unless supporting documentation indicates that someone else is, in fact, the true importer.
3. The importer will be considered to be the person who causes the goods to be exported to Canada.
4. Supporting documentation refers to waybills, purchase orders, commercial invoices (not Canada Customs invoices) or similar documents, which clearly establish that the claimant is the true importer in accordance with the definition in paragraph 2 of this memorandum.
5. Use of the term “business number” throughout this memorandum refers to the 15-digit Canada Revenue Agency registration number. It is made up of the nine-digit business number and a six-digit alpha-numerical number used to uniquely identify businesses’ import/export (RM) accounts.

Request for business number change prior to accounting

6. To change a business number on an interim accounting document, (a Release on Minimum Documentation (RMD)), before the Commercial Accounting Declaration (CAD) is submitted, a request must be made using [Form A48, RMD Correction](#). This request is to be submitted to the

superintendent of the long room or the delegated representative in the office where the goods were released.

7. If the customs broker who made the error does not have delegated authority for the correct business number, Form A48 must be submitted to cancel the RMD, along with a new paper RMD reflecting the new transaction number and the correct business number.

For more detailed information on changes to RMD, please refer to [Memorandum D17-1-4: Release of Commercial Goods](#).

Request for business number change after accounting

8. To change a business number after a CAD has been submitted, a request must be made through the CARM Client Portal (CCP) by one of the following Trade Chain Partners (TCPs):

- a) An importer who has delegated authority for both importer accounts (i.e. the business number that the CAD has been submitted under and the business number that the CAD will be transferred to); or
- b) A customs broker who has delegated authority to act on behalf of both importers; or
- c) A third party such as; a trade consultant, lawyer or accountant who has delegated authority to act on behalf of both importers

9. To request a change in the CCP, the TCP transfers the CAD to another business number using the withdraw function and selecting the new business number.

10. When submitting a request, the TCP must select reason code "R3-7-1.BN", provide an explanation for the request, and attach supporting documentation demonstrating that the CAD belongs to the business number that it is being transferred to.

11. A request to change a business number can not be made using Electronic Data Interchange (EDI) or Web Service (API).

12. Requests for a business number change after a CAD has been submitted may be made during either the correction period, or after the payment due date during the adjustment period.

13. All requests for business number changes will be reviewed by the CBSA, including the requests made during the correction period. If approved, the CAD will be cancelled from the account it was originally posted to and the duties and taxes will be credited. The account that the CAD was transferred to, will have the CAD posted to it, and a debit for the duties and taxes owing.

Business number changes involving Courier Low Value Shipment (CLVS) transactions

14. For requests that involve goods accounted for under the Courier Low Value Shipment (CLVS) program on a Type F CAD, where all shipments were accounted for under the

incorrect business number, a request for business number change can be made as per the procedures outlined in the [Request for business number change after accounting](#) section of this memorandum.

15. For requests made after the payment due date, where the CAD is consolidated and a select number of shipments are accounted for under the incorrect business number, a Type V CAD is to be submitted using the correct business number for the shipment(s) in question. An adjustment can then be submitted against the original Type F CAD, declaring these shipments as duplicates and referencing the new Type V CAD's transaction number. For information on how to submit an adjustment, refer to [Memorandum D17-2-1: Adjusting Commercial Accounting Declarations](#).

Business number changes involving pre-CARM accounting declarations

16. For requests that involve goods accounted for on a Form B3, Canada Customs Coding Form prior to the implementation of CARM Release 3, a Pre-CARM "As Declared" CAD must be created using the business number that was declared on the original Form B3.

17. Once a Pre-CARM "As Declared" CAD has been created, a request to change the business number on the CAD can be made as per the procedures outlined in the [Request for business number change after accounting](#) section of this memorandum.

CAD withdraw requests

18. A request to withdraw a CAD after it has been submitted to the CBSA, may be made by one of the following TCPs:

- a) The importer; or
- b) A customs broker who has delegated authority to act on behalf of the importer(s); or,
- c) A third party such as a trade consultant, lawyer or accountant who has delegated authority to act on behalf of the importer.

19. Requests to withdraw a CAD must only be made in instances where information on the CAD is incorrect but cannot be amended using the correction or adjustment processes in CARM. This includes errors in:

- a) CAD fields which cannot be edited (e.g. release office, release date);
- b) information declared on a Pre-CARM "As Declared" CAD; and,
- c) the transaction number, where a TCP submitted a CAD using a transaction number that belongs to another TCP, whom they do not have delegation of authority for.

20. Requests to withdraw a CAD may be made during either the correction period, or after the payment due date during the adjustment period.

21. Requests to withdraw a CAD will not be accepted in instances where a TCP has made a clerical error in the accounting information submitted on their CAD. Changes to accounting information must be made using a correction or an adjustment.

22. Requests to withdraw a CAD will not be accepted in instances where a TCP has accounted for the same goods on more than one accounting document. Where a duplicate accounting error has been made, a correction or adjustment must be submitted against the incorrect accounting document. Reason code “R2-74-1-D.Typo” is to be selected when submitting an adjustment request.

23. To submit a CAD withdraw request, the TCP must use the withdraw function in CCP. A request to withdraw a CAD can not be made using EDI or API.

24. When submitting a request, the TCP must select the “R2-74-1-D” reason code, provide an explanation for the request, and upload any applicable supporting documentation to explain the reason for the withdraw.

25. Failure to provide an explanation and attach required supporting documentation, will result in rejection of the withdraw request.

26. All requests to withdraw a CAD will be reviewed by the CBSA. If approved, the CAD will be cancelled on the account it was posted to, and the duties and taxes will be credited to offset the original CAD’s debt.

27. If a withdraw request is approved and the CAD is cancelled, the importer remains liable for any duties and taxes owing related to the importation.

28. Where a withdraw request is submitted to correct information for CAD fields which can not be adjusted, and the request is approved, a new CAD must be submitted by the TCP with the corrected information within 2 business days. Failure to resubmit a CAD within this period of time, may result in the application of penalties.

29. When a CAD is resubmitted, a late accounting penalty may be applied to the importer’s account if the CAD is submitted after the accounting due date. Information on how and when to appeal a late accounting penalty can be found in [Memorandum D17-1-5: Accounting for Commercial Goods](#).

30. If the CAD is resubmitted outside of the payment due date, the TCP must provide payment for the CAD using the CCP, on the same day that the new CAD is submitted. Failure to do so may result in collection actions on the TCP’s account. For information on how to make a payment, refer to [Memorandum D17-5-1: Payment of Duties and Taxes on Imported Commercial Goods](#).

CAD withdraw requests involving pre-CARM accounting declarations

31. If a TCP discovers that an error was made on a Pre-CARM “As Declared” CAD, for goods which were previously accounted for on a Form B3, prior to the implementation of CARM Release 3, they must cancel the CAD and re-submit the Pre-CARM “As Declared” CAD with the corrected information.

32. Like other withdraw requests, CBSA review and approval is required. Unlike a withdraw request on a post CARM CAD however, the approval of a Pre-CARM “As Declared” CAD will not result in a credit of duties on the TCP’s account, as no debit was charged when the Pre-CARM “As Declared” CAD was created.

Accounting errors where a customs broker does not have delegated authority for both importers

33. If a customs broker submits a CAD with a transaction number for goods that were released under a different importer, whom which they do not have delegated authority for, they must submit a withdraw request for the CAD. Once approved, the CAD will be cancelled on the incorrect importer’s account and the correct importer, or their customs broker, can resubmit a new CAD using the same transaction number.

34. If the customs broker incorrectly reported and accounted for goods for an importer that they do not have delegated authority for, and the transaction number provided will not be reused by the correct customs broker, the customs broker that made the error must communicate with the correct customs broker to resolve the error. The correct customs broker must submit a Type V CAD for the goods in question. Once submitted and accepted, the customs broker that made the error can submit a correction or adjustment for the incorrect transaction under reason code “R2-74-1-D.Typo”.

References

Consult these resources for further information.

Applicable legislation

[Customs Act](#)

Related D memoranda

- [Memorandum D17-1-4: Release of Commercial Goods](#)
- [Memorandum D17-1-5: Accounting for Commercial Goods](#)
- [Memorandum D17-2-1: Adjusting Commercial Accounting Declarations](#)
- [Memorandum D17-5-1: Payment of Duties and Taxes on Imported Commercial Goods](#)

Related forms

[Form A48, RMD Correction](#)

Superseded memoranda D

D17-2-3, September 8, 2015

Issuing office

Regulatory Trade Programs Division
Trade and Anti-Dumping Programs Directorate
Commercial and Trade Branch

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