



eManifest Questions and Answers

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General

Question 1:

Do CCN numbers have to be sequential or can it be the 8000# + HBL number if unique (no sequence)?

Answer:

The eHBL 8000 Cargo Control Number does not need to be sequential. It can be any unique number, but it cannot be repeated within current + 3 years.

Question 2:

If the shipment is only moving on a master, is any filing necessary?

Answer:

If the shipment is direct, consigned on the master/ carrier contract of carriage from a shipper to a consignee and there is no house bill contact of carriage issued, there is no requirement for eHBL filing. Remember one house bill = one eHBL data filing.

Question 3:

Scenario: In transit FCL with Master Bill of Lading consigned to US but moving via Canada, do we have to file the eHBL or will the steamship line file that? Master Bill of Lading consigned to final consignee with forwarder as notify party.

Answer:

eHBL filing is not required for two reasons. 1: The master bill of lading is consigned to the ultimate consignee and not to a freight forwarder and so it is direct and there is no house bill. If there is no house bill issued there is not need for eHBL data. And 2: The shipment is in transit through Canada on the master bill of lading and so is exempt from eHBL filing requirements. The carrier will need to file any ACI supplementary data that the carrier requires to ensure cargo loads.

Question 4:

Scenario: Personal effects, FCL shipment with only issuing Master Bill of Lading and CBSA request to have the true shipper/consignee details. Can you issue eManifest in this case under CY terminal, or would I need to move to bonded location first?

Answer:

If this is a 'direct' shipment, consigned to the importer on the master bill of lading with no house bill issued, there is no eHBL filing requirement as there is no consolidation. The shipment would load on the marine carrier's ACI filing and would move and have the Customs release request on the 9000 CCN. The Customs release request would be from the carrier's terminal.

Question 5:

IF a FCL container was discharged at Montreal and moving to US via rail but still under the steamship line care (Master Bill of Lading destined to US), are we, as the notify party, required to file eHBL/close?

Answer:

No. eHBL filing is not required: The shipment is in transit through Canada on the master bill of lading and so is exempt from eHBL filing requirements. The carrier will need to file any ACI supplementary data that the carrier requires to ensure cargo loads.

Question 6:

Does eManifest affect ISF-5 filing for containers on vessels calling US ports before discharging Canada?

Answer:

No. The US requirements for AMS and / or ISF-5 filing stay the same.

Question 7:

We often have cargo consigned to us that we do not know of until we receive the arrival notice from the carrier in Canada. If eManifest is not properly filed and as per deadlines, who is responsible for the fines? Can the Canadian forwarder be exempted from fines in these situations?

Answer:

Well, there are several complexities in this question. When eHBL is mandatory (January 4, 2021):

- The AMP is against the company whose 8000 code was used to file the eHBL and Close Message. (For example, late transmission or not true and correct)
- If the shipment is a marine shipment, it will only load overseas if the eHBL data has been filed within the timeframes. If the eHBL was filed by a 'foreign / non-Canadian' forwarder under its 8000, that shipment could arrive in Canada and be Customs cleared and delivered before you even know about it. And you, the Canadian forwarder named on the master bill of lading, would still be liable to the steamship line as the consignee on that contract of carriage. CIFFA's recommendation is that every Canadian forwarder instruct every agent not to consign cargo to your company without your express approval and your company determines whose 8000 code is used to file the eHBL.
- If air freight and the shipment arrives in Canada without the eHBL transmission within the timeframes (i.e.: 4 hours prior to Arrival) then i) there will be delays on arrival as there will be no risk assessment data available to the CBSA and ii) the CBSA may file an AMP for non-compliance, in which case the freight forwarder would have to argue that it had not received any alert from the origin.

Question 8:

Do you have a list of airlines and terminals with sublocations to file eManifest? Often we do not know where the cargo will be arriving and filing in advance with accurate information will be a real challenge.

Answer:

The CBSA posts sublocation codes <https://www.cbsa-asfc.gc.ca/import/codes/sw-ea-eng.html>.

Question 9:

If you are using a **third-party service provider**, do you need to register for the **Portal** and if so why?

Answer:

Previously we have recommended that Canadian freight forwarders sign up for the Portal as a back-up, as it has some excellent features and is accessible 24/7. And the CBSA will be issuing notices and bulletins in the Portal. Manifest Forward and Notices such as D4 Deconsolidation Notice are available in the Portal. After speaking with several freight forwarders, it has become clear that if you have a third-party service provider you may not need to sign up for the Portal, but CIFFA still recommends that you do.

Reminder: the eManifest Portal is not to be used as a record-keeping tool; once documents are processed in full, they are then moved to the Historical list and kept for a maximum of 60 days. Download and back up your data.

Question 10:

Does the D4 Deconsolidation Notice on the CBSA Portal appear after the shipment is acquitted?

Answer:

Yes. D4 Deconsolidation Notices are available in the Portal and they cascade once the 8000 CCN(s) have been Customs released.

Question 11:

Has the CBSA made a decision to disallow foreign freight forwarders the ability to file eManifest or are they still going to be allowed?

Answer:

A company anywhere in the world registered with the CBSA and with an 8000 Freight Forwarder Code can transmit eHBL data.

Question 12:

Can we use our overseas agent's 8000 number to request the release / submit the eManifest?

Answer:

Yes. That is a decision your company must make, remembering that if you allow the overseas agent to file under its 8000 CCN how will you get visibility to that shipment? You won't be able to see it, make changes to it, etc. unless your agent gives you access to its software/ third party service provider and why would you allow that? You would have neither visibility nor control. Please be reminded: If your agent holds a non-bonded 8000 CCN, then the Port of Destination / Sub-Location code on the eHBL 8000 CCN must match what is declared on the 9000 CCN or on the 'Previous', bonded 8000 eHBL; release can only take place when they match.

Question 13:

What is the difference in visibility when an agent files and when a service provider files?

Answer:

A third- party service provider is the 'Software as a Service' provider that allows a freight forwarding company to complete and transmit eHBL data, Close Message data, Notices etc. It makes no impact to visibility whether an 8000 CCN is filed via the CBSA Portal via a third-party service provider. However, if an agent overseas files the eHBL 8000 CCN under its own 8000 code, the Canadian freight forwarder will have no visibility to that 8000 CCN. You can only see your own 8000 CCN or one that an agent has given you authorization to see. So, visibility when agent files using its 8000 code could be zero.

Question 14:

Who will be responsible for paying the service fee, as shippers are paying an ACI fee now? If the Canadian forwarder files, would the (eManifest) fee be collected from the consignee, or billed back to the origin forwarder?

Answer:

Technically, the payment of any charges related to transmission of the Canadian eHBL data should lie with the party responsible for 'import charges' or 'security' charges, as the data is required by the Government of Canada on an importation. Canadian freight forwarders will need to communicate clearly with their agents as to who will transmit the eHBL data, whose 8000 code will be used, who will assess any fees – and if those fees will be paid by the shipper or by the consignee. Normally the origin office would debit its customer or would include the fees in their quotation, depending on the term of sale of the transaction (Incoterm). Traditionally many freight forwarders in Canada charge a 'Handling Fee' or a 'Terminal and Handling Fee', which has included producing and delivering the 8000 Advice Notice, now done by eHBL.

Question 15:

Do you have to test for manifest forward with the CBSA or is it automatic with eManifest messaging?

Answer:

For those forwarders utilizing a third-party service provider, there is no additional testing or registration required for Manifest Forward with the CBSA. Third party service providers

must have gone through testing with the CBSA; once successfully certified all their clients receive all eManifest messaging. The question to be asked is whether your third-party service provider has programmed to send and receive Manifest Forward data – and whether or not it has been mapped to your operating system. Clients wanting to receive Manifest Forward data will have to request this separately from their Service provider, as there may be additional fees attached for this service.

Question 16:

Scenario: Using **Manifest Forward** for LCL cargo: If the master consolidator files eHBLs for their consolidation and if our 8000 freight forwarder code is on their filing as a Secondary Notify Party (SNP) we should be receiving the CCN /PCN and all other data , as soon as the filing has been in "Accepted" status" with CBSA via a Manifest Forward. Does that mean we could potentially receive the CCNs through the Manifest Forward even before receiving the same from our overseas agent? Would that mean it would be a wise strategy to ensure that overseas agent always requires the consolidator to input our 8000 series in the SNP when bookings are being made for our cargo & when NVO / consolidator files their eManifest?

Answer:

There are strategic decisions to be made on whose 8000 code will be used for eHBL filing, the overseas agent's or the Canadian freight forwarder. If the agent's 8000 code is used, the Canadian freight forwarder will probably have no visibility to the transaction and no possibility of revising, changing, modifying the eHBL transmission. However, mandating that agents always include your Canadian freight forwarder 8000 code as the Secondary Notify Party (SNP) for Manifest Forward would go a long way to providing early visibility and sounds like an excellent idea.

Question 17:

As per the CBSA eManifest requirements, "***The description should be in plain language and detailed enough to allow the CBSA to identify it***". If the shipper/consignee are providing as cargo description FOOD STUFF, knowing that this description is a not an acceptable description, should the Freight Forwarder submit the eManifest using this description or should he ask for a better one? Who is liable for the accuracy of the information entered, the Freight Forwarder or the shipper/consignee?

Answer:

The holder of the 8000 code that transmits the eHBL data is responsible for the accurate, true and correct nature of those data. Because no-one wants a shipment ordered Do Not Load or held for additional risk assessment, Canadian freight forwarders must instruct offices and agents overseas to work with shippers to ensure complete and accurate information is provided on the house bill of lading / contract of carriage and thus on the eHBL transmission. For example, the overseas office or agent could ask for supporting commercial information from the shipper and provide the necessary description on the house bill contract of carriage.

Question 18:

How would customers that self clear receive arrival notices?

Answer:

You can continue to send Arrival Notices to an importer or to a Customs broker in any way you choose. There is no need to change that because of eHBL.

Question 19:

Are Customs brokers able to submit Customs clearance release request for a shipment while it is enroute on rail (example discharge in Montreal Port and cargo destined to CY Toronto) or does the broker need to wait until cargo has been physically Arrived at the destination?

Answer:

The Customs broker may file the Customs release request using the eHBL 8000 CCN in advance of Arrived, depending on the type of entry. For example, the Integrated Import Declaration (IID) can be submitted as much as 90 days prior to Arrival, and a PARS entry up to 30 days prior to arrival. The Customs status of the release request (i.e.: released) will only be visible after the 8000 CCN has been WACM / Arrived.

As per CBSA, RMD entries may be problematic if submitted prior to cargo arrival, as CBSA officers may either reject them if cargo not Arrived (possibly issuing an AMPS penalty), or just release them only upon arrival. Also, there are no status updates on RMD entries once submitted until they have been Arrived.

Question 20:

Can you confirm the process for becoming a 8000 bonded freight forwarder?

Answer:

See the CIFFA Toolbox at <https://www.ciffa.com/download/factsheet/Freight-Forwarders-8000-Series-FACT-SHEET-Updated-April-2019.pdf> and the CBSA at <https://www.cbsa-asfc.gc.ca/services/carrier-transporteur/arcff-taft-eng.html#s0x3>.

Question 21:

We have a non-bonded freight forwarder 8000 code. If in future we decide to become a bonded freight forwarder, what is the difference between the bonded freight forwarder and a bonded warehouse?

Answer:

There are several types of bonds issued by the CBSA. See above to become a bonded freight forwarder, which basically is done by registering with the CBSA and posting the \$25,000 freight forwarder bonded carrier code bond. To become a bonded Sufferance warehouse, you would need to comply with the Sufferance Warehouse regulations as outlined in Customs Memorandum D4-1-4 and post any bond they may require. Completely different businesses.

PS: Just to complicate matters, there are two types of Bonded Warehouses: Customs Sufferance Warehouses (D4-1-4) and Customs Bonded Warehouses (D7-4-4). Goods get authorized for release from a CW warehouse, or authorized to move in bond to a Customs Bonded warehouse for a period of up to 4 or 5 years, without payment of duties and taxes until such time as an ex-bond entry is submitted and released for either all or part of the goods.

Question 22:

Do we require a bonded 8000 code if we work with our agent overseas with full containerload imports where multiple house bills are consolidated together and destined to the same importer?

Answer:

There is no requirement for a freight forwarder to have a **bonded** 8000 code. *However*, there are limitations to eHBL filing and to goods movement for non-bonded freight forwarders. For example, a non-bonded 8000 code cannot file a 'consolidated' eHBL and a non-bonded 8000 CCN can only move to the warehouse / sublocation code of the carrier above it.

Data Elements, Changes, Corrections, Amendments, Timeframes

Question 23:

What are the mandatory data elements?

Answer:

Data elements are listed in the eCCRD Chapter 5 Appendix B. The eCCRD is available by email request to: tccu-ustcc@cbsa-asfc.gc.ca

Question 24:

What electronic corrections be made after the cargo has arrived in Canada?

Answer:

Corrections can be made electronically to any data element (including cancellation) to the eHBL and/ or Close Message before the goods are Reported (CACM) or Arrived (WACM). After Report/ Arrival and before acquittal corrections are made as Amendments and can also be made electronically, but only for certain data elements. Post acquittal and for certain key data elements, Form BSF673 must be completed. **See eCCRD Ch 5 pages 15 & 16 for the business rules.**

Paragraph 9. "With the exception of the House Bill number, Carrier Code or Previous CCN of the House Bill Close Message (key data elements), or Consolidation Indicator on the House Bill, post-arrival amendments will be accepted by CBSA systems on House Bills and House Bill Close Messages until the record has been transferred to the archival history database, usually after 90 days."

Question 25:

Will customs accept form BSF673 via e-mail or do we need to do personal presentation?

Answer:

Form BSF673 can be sent via email/ fax to the Customs office. A list of the CBSA offices providing eLongroom services by email and their email address can be found at: <https://www.cbsa-asfc.gc.ca/do-rb/services/elrmanifest-scemanifeste-eng.html>

Question 26:

The major part of our concern is the CBSA Office of Discharge - office code / warehouse sublocation code as overseas most steamship lines are unable to provide by the time of booking.

The screenshot shows a web form with several sections. The 'Office of Discharge' section has two dropdown menus for 'Office Code' and 'Warehouse Code', both with red arrows pointing to them. The 'Office of Destination' section has two dropdown menus for 'Office Code' (with '0495 TORONTO (PORT OF TORONTO)' selected) and 'Warehouse Code' (with '3037 CN Railways IntermodalServices I' selected). There are also fields for 'Special Instructions' and 'Business Comments'.

Often the carriers change the POD terminal at the very last moment. It will be hard for us to keep track and adjust multiple entries all the time. Do we need to file the CBSA Office/Port of Discharge and Port of Discharge Sublocation Code on our eHBL data?

Answer:

The eHBL implementation of the eManifest program is a freight forwarder responsibility and liability.

Port of Discharge / Port of Discharge Sublocation Code (in your screen shot Office of Discharge Office Code and Warehouse Code) are '**Conditional**' data elements. If you have the Port of Discharge Code on your house bill when you file the eHBL transmission, you must provide both it and the sublocation / warehouse code. However, if you don't have that data element, you do not need to provide either. Normally these are not data elements that a freight forwarder would have and so the condition is not met and so you wouldn't need to provide.

Question 27:

Can you 'not provide' Port of Discharge and Port of Discharge Sublocation Code for In-Transit cargo as well?

Answer:

Port of Discharge and Port of Discharge Sublocation Code are "Conditional" data elements for all Movement Types. (See Q: 26 above). Do not confuse these data

elements with Port of Destination/ Exit and Port of Destination/ Exit Sublocation Code, which are “Mandatory” data elements on eHBL with Movement Type In-Transit.

Question 28:

Does the movement types include FROB?

Answer:

eHBL Movement Types are Import, In Bond, In Transit. [Note: Freight Remaining On Board (FROB) shipments require ACI S10 Supplementary data.]

Question 29:

The CBSA posts the deadlines for filing eHBL by mode. What is the recommended max lead time to file?

Answer:

eHBL data may be transmitted up to 90 days before arrival (up to 90 days before loading for marine mode).

Movement Type

Question 30:

Who is responsible if the trucker does not report the in-transit shipment at the port of exit? Is it the forwarder since forwarder bond? Would there be penalties or just provide CBSA proof that the cargo has entered the USA to close off the 8000 CCN bond open?

Answer:

If the shipment type is **In Transit** on the eHBL 8000 CCN and the shipment is traveling to the Port of Exit on the freight forwarder’s 8000 CCN (with the Port of Destination/ Exit and the generic sublocation code) the liability remains with the freight forwarder. If the trucker was instructed to present the 8000 CCN to the border officer at the port of exit and fails to do so, then there is probably an argument that the trucker should pay any penalty. It remains to be seen if the CBSA would accept ‘proof of entry’ into the USA as ‘proof of exit’ from Canada.

Question 31:

What if one HAWB needs to move inland for clearance (i.e. personal effects) to Hamilton. Is this still filed as import even though the consolidation is handled out of 497 (Toronto) port?

Answer:

If the house bill is destined to Canada, the Movement Type can be Import or In Bond. If the eHBL has a Port of Destination 0497 (Toronto) and a related sublocation code CW warehouse, the Hamilton destined eHBL would be WACM Arrived by the warehouse operator with other eHBLs. Then the 8000 CCN would be acquitted with a paper

remanifest onto a bonded trucker's liability to carry the goods to Hamilton for Customs clearance.

[Note: If the freight forwarder has a relationship with a CW Sufferance warehouse in Hamilton and if the bonded 8000 CCN transmits a final Customs Port code of Hamilton with that associated sub-location code, the shipment could move under the freight forwarder's bond on its 8000 CCN to Hamilton. The big 'if' is whether or not the freight forwarder has the necessary business relationship with the destination CW Sufferance facility.]

Advance Commercial Information (ACI)

Question 32:

If we have a load pending after January 4th, 2021, if only ACI is on file, will that container still move from origin?

Answer:

Yes. During the six-month informed compliance period until June 4, 2021 the CBSA will accept ACI S10 Supplementary data for risk assessment purposes. However, the freight forwarder should receive a non-compliance notice, a zero-rated AMPs Notice of Penalty Assessment (NPA) for not filing the eHBL within the timeframes.

Question 33:

Does a carrier still file ACI in primary CCN?

Answer:

The carrier filing requirements do not change. Marine, air, highway, rail carriers must still file all applicable carrier "conveyance and cargo" data. It is the secondary 'house bill' data that is also now mandatory. [The carrier is not responsible for filing any ACI S10 Supplementary or eHBL data on behalf of the freight forwarder. The freight forwarder must file under a CBSA issued 8000 code.]

Question 34:

Can we arrange for customs clearance if both ACI and eHBL are filed for the same shipment?

Answer:

There is no link between the 8000-number attached to the ACI S10 Supplementary filing and the eHBL 8000 Cargo Control Number (CCN). In fact, those numbers cannot be the same 8000 number. Remember, the 8000 number attached to the ACI S10 Supplementary filing is only used as a shipment reference number. The 8000 number of the eHBL filing is the CCN that is used for the Customs Release Request. ACI S10 Supplementary data may still be filed until June 4, 2021. However, eHBL data filing is mandatory from January 4, 2021 and any freight forwarder filing ACI S10 data instead of the eHBL data would be non-compliant after January 4, 2021.

Question 35:

Is it correct that the eHBL CCN must always be different from the ACI S10 supplementary filing number?

Answer:

The ACI 8000 reference number cannot be the same as the eHBL 8000 Cargo Control Number (CCN). The ACI 8000 refence # is not a Cargo Control Number. Remember, as soon as a freight forwarder begins to file eHBL data and Close Messages there will no longer be the need for any ACI S10 Supplementary filing as the eHBL 8000 CCN is used for both risk assessment and for the Customs release request.

Question 36:

For LCL shipments, if one of the freight forwarders doesn't file the eManifest and Close Message, will the container be on DO NOT LOAD mode?

Answer:

Multi-tiered consolidations will, in all likelihood, be very problematic until everyone is filing eHBL and Close Messages within the timeframes ... at least 24 hours prior to load. Between November 1, 2020 and June 4, 2021 cargo will load on an ACI S10 Supplementary filing and a paper Customs release request.

CIFFA strongly recommends all NVOCC / master co-loaders establish and communicate the business rules that will govern entrance into its consolidation, with firm deadlines for everyone to file eHBL well before January 4, 2021. And those business rules must flow down through every freight forwarder in the consolidation that issues a house bill consigned to another freight forwarder... an eHBL with a 'Consolidated Indicator Yes'.

Question 37:

If eHBL is filed, is there any need to file ACI S10 supplementary data before vessel sails or flight departs?

Answer:

If eHBL + Close Message data are transmitted no ACI S10 Supplementary is required.

Question 38:

Will air carriers will be responsible to file eManifest information for all inbound international cargo shipments to Canada by January 2021? Will ACI information no longer be required to be filed after this date?

Answer:

Air carriers must continue to file their ACI conveyance and cargo data. That does not change. What does change is that the freight forwarder or its agent must file the eHBL secondary data set on an 8000 Cargo Control Number within the air timelines. If the freight forwarder fails to file the eHBL data set within the air timelines, between January 4, 2021 – June 4, 2021 CBSA will issue a zero-rated AMPS Notice of Penalty Assessment (NPA)

and after June 4, 2021 there will be a real dollar amount on the AMPS NPA (Notice of Penalty Assessment) issued.

Question 39:

Until the eHBL implementation, ACI for air has normally been filed by origin. In the future, is the destination agent responsible for eManifest? In other words, should origin still file ACI, and destination file eManifest to avoid getting a penalty. Should both ACI and eHBL be filed?

Answer:

As of January 4, 2021, it is the responsibility of the freight forwarder to ensure that the eHBL data set and the Close Message are filed within the air timeframes, generally four hours prior to arrival at the first Canadian airport. If the Canadian/ destination forwarder chooses to allow its agent at origin to file the eHBL and Close Message under its 8000 code that is fine. That overseas agent becomes liable for data being true and correct and meeting the timelines etc. However, CIFFA highly recommends that the Canadian freight forwarder strongly consider re-writing agency agreements to ensure it receives the house bill data from its agent/ origin office far enough in advance to file the eHBL data and Close Message under its 8000 code. The eHBL can be transmitted up to 90 days before the cargo arrives in Canada and there would usually be sufficient notice. These are decisions that each Canadian company must make.

Question 40:

As of January 4th, could ACI supplementary be filed by the origin forwarder prior to LOADING and the destination forwarder file the eManifest prior to ARRIVAL? Would there be a penalty for not filing prior to loading?

Answer:

As of January 4th, 2021, it is mandatory to transmit the eHBL data set and the Close Message data set at least 24 hours prior to loading the vessel at the last port of departure before Canada. Both data sets may be filed up to 90 prior to loading. Between January 4th and June 4th, 2021 there will be notices of non-compliance and possibly zero-rated AMPs issued. After June 4th, 2021 AMPs penalties will be issued if all secondary is not filed within the timeframes.

Question 41:

If the overseas agent files both ACI and eManifest before a shipment sails from Taiwan, will that be an issue for shipment clearance in Canada?

Answer:

There is no need to file double data or pay for two transmissions. Remember, the 8000 number used to file the ACI S10 Supplementary data is a shipment reference only and is not linked to the eHBL 8000 Cargo Control Number. If the eHBL data set and the Close Message are both filed, then that eHBL 8000 CCN will be used for the Customs release request. There is no need then for ACI filing.

Question 42:

Will the changes coming into effect on January 4, 2021 affect whether or not our overseas agent files ACI data for single / full container loads?

Basically, will our agents continue to provide supplemental data to carriers on FCL cargo, as in the past, or will eManifest filing have to be arranged?

Answer:

As of January 4, 2021, ACI S10 Supplemental data should no longer be filed for either multiple house bill consolidation cargo or for single house bill, back-to-back shipments. Either your company or *if you decide to allow it*, your agent, must file the eHBL data set and the Close Message to the CBSA within the timeframes for both types of shipments. Please see several similar questions and answers on back-to-back shipments below.

Question 43:

Is it safe to say that if ACI Supplemental data filing is allowed by CBSA, filing ACI Supplementary is easier than filing eManifest? Therefore, is it beneficial to continue filing ACI Supp? For example, filing for FROB and In-Transit shipment, it should be easier to file ACI Supp?

Answer:

As of January 4, 2021, all house bills destined to Canada must have a corresponding eHBL data transmission and a Close Message data transmission. Freight Remaining on Board (FROB) is exempt from eHBL filing requirements and so ACI S10 Supplementary data **must** be filed for risk assessment. Cargo In-Transit through Canada can also be filed with ACI S10 Supplementary data [Ref: Customs Notice CN16-23], or equally through eHBL filing.

Freight forwarders can continue to maintain two systems for filing, ACI S10 Supplementary for the exceptions noted above and eHBL for the required **secondary** data filing. At some point in the future the CBSA will move all filings to one system – eHBL.

Full Container Load (FCL) / Back-to-Back Shipments

Question 44:

How can you file eHBL on full containers (non-consolidated back to back) and clear customs directly out of the rail? The rail systems only shows remanifested to 8000 series and they don't 'Arrive' 8000 series HBLs at the time of arrival.

Answer:

Even though there is only one house bill, the CBSA considers a back-to-back shipment to be consolidated, because there is at least one house bill. Therefore, there must be an eHBL and Close Message. The railroad / marine terminal must subscribe to the CBSA Notices and particularly to the **D4 Deconsolidation Notice**. The railroad / marine terminal

handles the 9000-manifest exactly as it does today. No system or other changes. When the shipment is “Arrived” / WACM by the railroad / marine terminal on the 9000 Primary CCN and when the 8000 CCN is Customs released, the D4 Deconsolidation Notice cascades and the shipment is ‘authorized to move’. [Note: Both CN and CP advise they are fully capable of receiving D4 Deconsolidation Notice messages.]

Question 45:

Will there be any issue for FCL shipments (when the HBL is consigned to 1 customer) if the overseas agent issues the ACI?

Answer:

During the informed compliance period until June 4,2021 (subject after January 4, 2021 to zero-rated AMPS NPA - Notice of Penalty Assessment) **if** an agent files the ACI S10 Supplementary data the cargo will load and the Customs Release Request can be on the 9000 marine Cargo Control Number. However, **if** the eHBL data is filed, the Customs Release Request will be on that 8000 CCN. eHBL data and Close Message are mandatory as of January 4, 2021.

Question 46:

On FCL/ single shipments will the carrier’s 9000 Cargo Control Number be used for Customs clearance? Or do we use the eHBL 8000 CCN (bonded)?

Answer:

The eHBL 8000 CCN is the shipment identifier for risk assessment and is also the cargo control number used for the Customs release request. The eHBL 8000 CCN will be the CCN used for the Customs release request. The 8000 code can be bonded or non-bonded, although non-bonded 8000 codes are restricted in some ways. (For example, a non-bonded 8000 cannot issue a ‘Consolidated Y’ eHBL or move cargo beyond the warehouse sublocation code of the forwarder or carrier above it.)

Question 47:

Before November 1, 2020 for back-to- back shipments we provided the 9000 Carrier manifest to the Customs broker. After November 1, 2020 we will begin to transmit eHBL data for both consolidated shipments and for single, back-to-back shipments. Will we need to send our 8000 manifests to the broker or continue to send the 9000 of the carrier?

Answer:

Once the freight forwarder begins to file eHBL for back-to-back shipments the freight forwarder will send only the eHBL 8000 manifest to the Customs broker.

Question 48:

Regarding using 8000 not 9000 for customs clearance, when does this start? If the ACI Supplementary data was filed do we need to file eManifest again in order to get the 8000?

Answer:

If the ACI S10 Supplementary data was filed and the cargo loaded, the freight forwarder may process the Customs release against the primary carrier 9000 CCN. Or the freight forwarder may file an eHBL data set and Close Message and then the Customs release request will be under that eHBL 8000 CCN. As of January 4, 2021, the eHBL data set and the Close Message must be filed *within the timeframes* or risk receiving a zero-rated AMPS NPA (Notice of Penalty Assessment). When an eHBL 8000 secondary data is filed, that eHBL 8000 CCN is used for the Customs release request.

Question 49:

Will the rail Arrive an 8000 to trigger a clearance?

Answer:

The railroad/ marine terminal will not Arrive the 8000 CCN. The railroad/ marine terminal will WACM/ 'Arrive' the 9000 CCN as it has done traditionally. The eHBL 8000 CCN is attached to the 9000 as the Primary CCN in the eHBL data and as the Previous CCN in the Close Message. When the 8000 CCN is Customs released, it triggers the **Deconsolidation D4 Notice** against the 9000 (or against the airline MAWB), thus allowing the shipment to leave the terminal.

Question 50:

A back-to-back air shipment ex LHR - YYZ arriving on AC. Can a Canadian non-bonded carrier file eHBL using AC YYZ sub-loc number?

Answer:

A non-bonded 8000 freight forwarder can file eHBL for Customs clearance from the primary airline warehouse. The Customs release request will be on the eHBL 8000 CCN. The airline warehouse will CACM / WACM to Arrive the airline MAWB. The airline warehouse (primary terminal) must be subscribed to the CBSA Notices and in particular to the **D4 Deconsolidation Notice**. When the MAWB is Arrived/ WACM and when the shipment is Customs cleared, the D4 Deconsolidation Notice will cascade and the shipment will be authorized to move. Even if the 8000 CCN is non-bonded, the shipment can move to the sublocation of the bonded carrier or forwarder above it, in this case to the airline warehouse sublocation code.

Question 51:

For air and/ or ocean back-to-back shipments does a freight forwarder need to transmit eHBL secondary data or is the ACI S10 allowed?

Answer:

As of November 1, 2020, you may transmit eHBL data for air or ocean back-to-back shipments, by January 4, 2021 you should transmit eHBL data and by June 4, 2021 you must transmit eHBL data, within the modal timeframes.

Question 52:

How does a non-bonded freight forwarder file for a FCL shipment since the Previous CCN is a 9000?

Answer:

On any single / FCL / back-to-back shipment, the eHBL 8000 CCN must be transmitted, referencing the **Primary** CCN (9000). The Close Message must also be filed, referencing the **Previous** CCN, which in the case of a single / FCL back-to-back shipment would be the same 9000 CCN as the Primary. The Close Message, the 'staple in the file', tells the CBSA that there is one eHBL 8000 CCN attached to that Previous CCN. The CBSA will expect one Customs acquittal against the 8000 eHBL CCN. When the 8000 CCN is Customs released, the D4 Deconsolidation Notice is triggered at the primary terminal.

The sublocation code of the **non-bonded** freight forwarder's eHBL 8000 CCN must match the sublocation code of the Previous CCN which is filed by the marine carrier in its ACI transmission. In this case, that Customs release request would be from the railroad terminal or marine terminal sublocation code.

Question 53:

Can a non-bonded freight forwarder file eHBL for a single back-to-back? What happens if there are two non-bonded forwarders on the master bill of lading?

Answer:

A non-bonded freight forwarder 8000 code can be used to file a single, back-to-back shipment. The sublocation code of the eHBL data must match the sublocation code of the bonded (primary or other) warehouse above it (i.e.: The Previous carrier). If there are non-bonded 8000 freight forwarder codes in tiers, all must match the sublocation code used by the bonded carrier code above.

Note: Some of the NVOCCs are testing in November 2021 to determine whether or not multiple tiers of 8000 CCNs on a single FCL back-to-back can Customs clear from a Primary terminal. Theoretically, once all of the 8000 CCNs in the tiers are acquitted / released, the D4 Deconsolidation Notice will flow to the Primary warehouse/ terminal. It should work.

Question 54:

What is the FCL eHBL/close message (back-to-back) filing deadline?

Answer:

Modal timeframes apply for all eHBL filing. On a back-to-back FCL ocean shipment, the marine timeframes apply. For example: At least 24 hours prior to loading on board the vessel at the foreign port of loading.

Question 55:

Is it possible for my non-bonded agent to e file before departure?

Answer:

Depending on your company's strategic decision as to which companies may file and under whose 8000 code, yes. A non-bonded foreign freight forwarder may file the eHBL data set and the Close Message within the timeframes.

Question 56:

Will rail carriers be ready to receive WACMs as of Nov. 1st? Will we be able to transfer the cargo from carrier's 9000 to our 8000 and have it released and have eDeconsolidation done at a rail terminal for Back to Back shipments (i.e. accepting D4 Deconsolidation Notices)?

Answer:

Both railroads have advised they are able to receive D4 Deconsolidation Notices. The Close Message linked to the Previous 9000 CCN facilitates the process.

Question 57:

Do back-to-back shipments have to clear at the sublocation code of the rail/airline/seaport terminal directly? Can back-to-back shipments be transferred to a bonded warehouse?

Answer:

The release request on a back-to-back eHBL with a bonded 8000 CCN can be from any warehouse the freight forwarder chooses. The freight forwarder files the sublocation code of the warehouse in its eHBL 8000 CCN, either the primary terminal or that of a CW deconsolidation sufferance warehouse, as it chooses. [Note: If the freight forwarder holds a non-bonded 8000 code, the Customs release request must be from the sublocation code/ terminal of the carrier.]

Buyer's Consolidation

Question 58:

In a Buyer's Consolidation can Customs release take place at the primary warehouse?

Answer:

A Buyer's Consolidation can clear from a primary warehouse. Both Buyer's Consolidation and back-to-back can clear from any warehouse type. [See CN20-28].

The sub-location on the eHBL data set must match the sub-location on the primary carrier ACI transmission. The shipment(s) Customs release request is on the 8000 CCN. That release triggers the D4 Deconsolidation Notice to the terminal (*as long as the terminal is subscribed to receive the Notices*).

So, when the goods are "Arrived" / WACM by the railroad or other primary warehouse/ terminal and **when** they are Customs 'released', the D4 Deconsolidation Notice flows and the goods are authorized to move. The D4 Deconsolidation Notice will cascade only when all of the 8000 CCNs have reached 'released' status by CBSA.

Question 59:

What is the definition of Buyer's Consolidation?

Answer:

CBSA definition: *'Buyer's consolidations' – where multiple house bills are consolidated together and destined to the same importer.'*

Question 60:

In a Buyer's Consolidation, do we have to declare each shipper as a separate eHBL?

Answer:

There must be one eHBL data transmission for each house bill contract of carriage. However, there are considerations made for shipments that are grouped at origin with, for example, one house bill with one shipper/ consignee pair and multiple vendors or suppliers. The vendor / supplier data is an importer responsibility. The shipper data on the house bill is the freight forwarder responsibility.

For example: The house bill contract of carriage could show: shipper: Canadian Retail X c/o ADB Consolidator, Singapore and the consignee Canadian Retail X. Historically, the CBSA has allowed this house bill scenario if title / ownership has transferred from the various vendors to the Canadian consignee prior to loading. Verify with the CBSA to ascertain if this applies to your customer.

There must be one eHBL 8000 CCN for every house bill contract of carriage. The eHBL data set must match the house bill contract(s) of carriage. If there are multiple house bill contracts of carriage, there must be multiple eHBL data filings. (Remember, these multiple 8000 CCNs can be pulled by the Customs broker to one release request.)

Question 61:

Does a Buyer's Consolidation have to move to a CW warehouse or can it clear at the primary?

Answer:

As per Customs Notice CN20-28 a Buyer's Consolidation can clear from a primary terminal after November 1, 2020.

Question 62:

Is a Buyer's Consolidation release possible at a secondary (CW) warehouse?

Answer:

The Customs release request can be made from any type of warehouse, at the freight forwarder's decision, depending on the sublocation code in the eHBL data set.

Question 63:

Please explain how there may be multiple 8000 CCNs 'cancelling' one Primary CCN.

Answer:

In a Buyer's Consolidation there may well be multiple eHBL 8000 CCNs, all destined to the same importer. The Close Message transmitted by the freight forwarder links all of those 8000 CCNs to the **'Previous' Cargo Control Number**, which in this example would be the same as the carrier's Primary Cargo Control Number in each eHBL 8000 transmission. Thus, the primary carrier's CCN is 'cancelled' by the 8000 CCNs. All of the 8000 CCNs can be attached to one Customs release request.

Question 64:

Scenario: A Buyer's Consolidation has four house bills. Will this container have four RNS releases the rail terminal?

Answer:

The railroad does not receive the 8000 RNS. All of the four house bill (eHBL) 8000 CCNs must be acquitted in the CBSA's system and show status as 'released'. All four 8000 CCNs may be pulled to one Customs release request by the Customs broker or there may be one Customs release per 8000 CCN. When all four 8000 CCNs are Customs released, the **D4 Deconsolidation Notice** will be triggered and the shipment authorized to move from the railroad. The railroad will manage the 9000 Cargo Control Number as it does today and will rely on the D4 Deconsolidation Notice.

Question 65:

Scenario: We received a shipment at Vancouver terminal which went by rail inland. The master consolidator / co-loader issued its 8000 manifest with our freight forwarding company as shipper and consignee. The shipment was a Buyers Consolidation with different shippers (four HBL). Will this type of shipment with multiple tiers of freight forwarder 8000 CCNs Customs clear from a primary terminal after November 1, 2020?

Answer:

In this scenario the final freight forwarder has a Buyer's Consolidation, which after November 1, 2020 may Customs release from a Primary (CP) terminal. **However**, in this scenario there are two tiers of 8000 CCNs. The master consolidator/ co-loader's 8000 CCN is linked in its Close Message to the marine carrier's **Previous CCN** and that 8000 CCN rightly has a 'Consolidated Indicator Yes'. The freight forwarder who 'owns' the Buyer's Consolidation will quote the carrier's 9000 as the **Primary** on its eHBL filings and it will quote the master consolidator/ co-loader 8000 CCN as the **Previous** CCN its Close Message. The Close Message acquits the first master consolidator/ co-loader's 8000 CCN.

The CBSA confirms that because of the linking of the 8000 CCNs to the Previous and the Previous to the Primary, when all of the 8000 CCNs are Customs released, the **D4 Deconsolidation Notice** will flow to the Primary terminal allowing movement of the container from the yard directly to the importer.

Note: Some of the NVOCCs are testing in November 2021 to determine whether or not multiple tiers of 8000 CCNs on a single FCL back-to-back or Buyer's Consolidation can

Customs clear from a primary terminal. Theoretically, once all of the 8000 CCNs in the tiers are acquitted / released, the D4 Deconsolidation Notice will flow to the Primary warehouse/ terminal.

Question 66:

Must all containers on a multiple container master bill of lading Buyer's Consolidation be 'arrived' at the inland rail terminal before the shipment will Customs clear on an IID?

Answer:

For a master bill of lading with multiple containers arriving via a Canadian First Port of Arrival, all of the containers are considered Arrived when the first container is Arrived/ WACM by the railroad/ terminal, as long as all containers have been Reported by the carrier CACM. An Integrated Import Declaration (IID) entry type can be submitted up to 90 days prior to Arrival of the shipment. The Customs release status will flow when the first container is "Arrived"/ WACM.

Marine

Question 67:

In a multi-tiered consolidation, what happens if the freight forwarder above us does not file e-HBL?

Answer:

Between November 1, 2020 and June 4, 2021 cargo will load at origin with ACI S10 Supplementary data filing. However, if a freight forwarder above you in the tier does not file eHBL, your company cannot file eHBL and must also file ACI S10 with a paper Customs release request on a different 8000 #. And, from January 4, 2021 to June 4, 2021 the CBSA may issue zero-rated AMPS NPA (Notice of Penalty Assessment) to every company that fails to file the eHBL data set and Close Message within the timeframes, And, after June 4, 2021 cargo will not load and there will be a real dollar AMPS NPA (Notice of Penalty Assessment) AMPs will be issued.

Question 68:

eHBL for LCL shipments have to be filed no less than 24 hours prior to loading. In the case of larger NVOCCs, if one of the lower consolidators did not file in a timely manner is it correct that the container will not load at origin?

Answer:

After June 4, 2021 eHBL data and Close messages must be filed for every shipment in the consolidation within the timeframes. In the marine mode, that is at least 24 hours prior to loading of the vessel at the overseas port of departure. If all eHBLs are not transmitted within that timeframe, the consolidation will be subject to Do Not Load at origin. eHBL data and Close Message data may be filed up to 90 days prior to loading in the marine mode.

Question 69:

When you file eHBL for co-loaded cargo, do you have to provide both Primary and Previous CCN? Or only Previous CCN is ok?

Answer:

Every eHBL transmission must reference the marine carrier's **Primary CCN**. Every Close Message must reference the **Previous CCN** above it, the co-loader's 8000 CCN. In a co-load situation, regardless of the number of freight forwarder tiers, every freight forwarder must quote the carrier's Primary CCN in its eHBL data. (Co-loaders must communicate quickly and efficiently to ensure the Primary CCN gets to every freight forwarder in the consolidation.) Every Close Message must reference the freight forwarder's 8000 Previous CCN above it.

Question 70:

What happens if the NVOCC doesn't start filing eHBL by January 4, 2021?

Answer:

Every freight forwarder in that consolidation will be non-compliant and CBSA may issue zero-rated AMPS NPA (Notice of Penalty Assessment).

Question 71:

What will occur if a co-loader doesn't file eHBL from all origins?

Answer:

As of January 4, 2021, all co-loaders must file eHBL data within the timeframes. All NVOCC and co-loaders must establish clear business rules and dates and deadlines to file eHBL and Close Messages well before the January 4, 2021 mandatory date.

Question 72:

In a LCL shipment with co-loader, who's responsible for late filing if the co-loader has not provided the information for filing in time?

Answer:

In the marine mode, late filing penalties may not be the problem. The problem is the container may not load if all of the eHBL data and Close Messages have not been filed. If the co-loader fails to send its 8000 eHBL data to its customers far enough in advance to allow its customers (and all of the customers in tiers) to file the 8000 eHBL data, then whoever in the chain failed should be held responsible. CIFFA is urging every freight forwarder issuing a 'Consolidated Indicator Yes' eHBL to establish business rules regarding timing and communication and whose shipment is allowed into the consolidation.

Question 73:

For rail shipments, even if they arrive under one master bill of lading at a U.S. first port of arrival, when crossing the border to Canada, the railroad will break down the shipment into different manifests (one rail manifest per container). But in this case, the consignee

will be the steamship line and the forwarder in Canada the notify party on the rail manifest. How can we file eManifest on cargo that is not consigned to us?

Answer:

The CBSA has confirmed that the forwarder is allowed to file an eHBL data set referencing the rail primary cargo control number in this situation. The contract of carriage on the Master Bill of Lading is still between the ocean carrier and the freight forwarder, with a Canadian Customs Office/Port of Destination (delivery). The rail line is only a sub-contractor. Of course, the rail Primary CCN must be used for CBSA eHBL filing purposes.

Question 74:

For shipments arriving in Canada by rail from a US port of arrival, how will the freight forwarder receive the 6000 CCN - from the shipping line or from the rail company?

Answer:

If the freight forwarder is the Notify Party on the rail EDI manifest, it can receive the 6000 CCN manifest from the railroad. The marine carrier should also have responsibility for advising the freight forwarder of the 6000 CCN.

Question 75:

For marine shipments arriving by rail from a US port of arrival, would we need to cancel the eHBL issued before loading, if rail eHBL is filed?

Answer:

The eHBL and Close Message issued prior to loading at origin could be cancelled and new eHBL and Close Messages transmitted, with the rail carrier's Primary CCN. *However*, it might be easier simply to Change the data elements of the original eHBL that need changing (such as the Primary CCN in the eHBL data set and/ or the Previous CCN in the Close Message.) Changes before Arrival need not affect the 8000 CCN, which may have already been issued to the Customs Broker, for example.

Question 76:

Do we know what data the ocean carriers are providing to our overseas agents and the timeframes that they're doing it in? Can we be confident that our agents are getting the information that we need at the time that we need it?

Answer:

The only data element that an overseas agent must get from the marine carrier is the **Primary Cargo Control Number**. Most marine carriers have a standard formula for adding their 9000 CBSA Carrier Code to their bill of lading number, thus creating the Primary CCN. The agent only needs to know the formula for that carrier and their bill of lading number. All other data elements are house bill data elements, that your agent has already.

Question 77:

For ocean transshipments, will the 24 hours filing time frame correspond to the initial port or transshipment port? And what do you do if the information changes (e.g. sub-locations, vessel details) after cargo arrives at the transshipment point?

Answer:

The marine timeframes refer to the last port of departure before the goods leave for a Canadian port. (So, yes 24 hours prior to loading at the last transshipment port before Canada.) eHBL data and Close Message data can be corrected / changed with an electronic Correction after sailing and before Reported (CACM) or Arrived (WACM).

Question 78:

What about Breakbulk and RORO Shipments arriving at a US Port from overseas and we will be issuing T&E Bond from US Port to Canada?

Answer:

Breakbulk, RORO or containerized shipments coming to Canada via a US first port of arrival will be handled depending on the mode by which they cross the border, either rail or truck. eHBL will be filed according to the timeframes of that mode of transport and the primary Cargo Control Number will be issued by the highway or rail carrier.

Question 79:

When the vessel was diverted for some reason such as weather or port strike etc. to US port instead of Canadian port, what needs to be done to amend eManifest and who is responsible?

Answer:

All requirements such as US AMS and ISF 5 filing must be met as usual. If a shipment arrives in Canada via a US port, the Primary CCN (and likely the Previous CCN on the Close Message as one container per manifest) will be the Rail or Highway carrier CCN. The freight forwarder whose 8000 is used to transmit the eHBL and Close Message is responsible to file, within those modal timeframes. Electronic changes to these eHBL data can be made easily in such cases.

Question 80:

Will marine carriers provide freight forwarders with their terminal sublocation for back-to-back shipments?

Answer:

Marine carriers will continue to provide exactly the same information they traditionally provide. It is possible that the marine carrier will issue its 9000 Arrival Notice with the sublocation code while the goods are in transit from the foreign port and so the freight forwarder may need to Correct or Amend the sublocation code (for example) after the original eHBL has been filed. The full list of warehouse sublocation codes is here: <https://www.cbsa-asfc.gc.ca/import/codes/sw-ea-eng.html>.

Question 81:

Will the marine carrier still be sending their Arrival Notices after Jan 4th?

Answer:

Marine carriers will continue to do exactly as they have been doing after January 4, 2021. There is no change to carrier requirements. Freight forwarder operations staff will need to know whether or not there has been an eHBL filed for a shipment which would then be clearing under the 8000 CCN or if no eHBL has been filed then clearing under the 9000 CCN.

Question 82:

Scenario: We have a weekly container from Antwerp to Montreal. Our partner files the ACI. We file the eManifest here in Montreal, point of clearance, at a bonded warehouse. Mostly there are multiple shipments, multiple shippers – multiple consignees. On the eManifest we always put “NO” on the consolidation indication, and we acquit the cargo through this manifest. I assume this is a correct process?

Answer:

As of January 4, 2021, both the eHBL data and the Close Message must be filed at least 24 hours prior to loading of the vessel at Antwerp. There is no requirement for the ACI S10 Supplementary data transmission. Your company must decide which organization will file the eHBL data set/ Close Message and under whose (bonded?) 8000 code.

You are correct that the Consolidated Indicator would be ‘No’ if each house bill (and eHBL) is consigned to the importer/ consignee and that 8000 CCN is used on the Customs release request to acquit the cargo.

Question 83:

Is there any difference filing data for an in-transit shipment arranged by shipping line, vs, an in-transit shipment arranged by a freight forwarder where the master bill of lading terminates in the USA and all house bills terminate in the USA?

Answer:

There is no difference. The key is that the house bill terminates in the United States, not in Canada. In-Transit cargo is exempt from eHBL filing requirements. [ref: Customs Notice CN16-23]

Question 84:

We have examples where there was no CACM or WACM issued for our shipments. Do we approach the carrier to find out where the issue is?

Answer:

There are a few technical issues or errors which might cause a failure in a CACM by the carrier or a WACM by a terminal or railroad. The carrier is responsible for filing the correct sublocation code in its ACI data set and for Arriving/ Reporting the cargo with its CACM.

If there is a failure in CACM or WACM, yes, contact the carrier to ascertain where the error occurred.

Question 85:

Is there a requirement under eHBL such that a marine carrier 9000 series cargo needs to move once in its entirety on to an 8000 then deconsolidated on to multiple 8000?

Answer:

There is no such requirement. When the 8000 eHBL has been transmitted, the cargo moves under that bonded freight forwarder 8000 CCN to the sublocation code / warehouse listed in the eHBL data set and as decided by the freight forwarder. If the 8000 code is non-bonded, the eHBL sublocation code must match that of the primary carrier, and there would need to be paper re-manifest to move it out of the terminal.

Question 86:

If a freight forwarder files eHBL prior to departure and cargo is rolled from a flight/vessel, do we then need to make an amendment?

Answer:

No. If the Primary CCN and the Previous CCN stay the same, there are no data elements for the freight forwarder's eHBL filing that need to be changed.

Question 87:

What happens when you have multiple containers that arrive via rail and manifested in one arrival notice and only one container arrived at destination and the other is still at the port of discharge?

Answer:

If all of the containers on one master bill of lading / 9000 CCN have been **Reported** as being in Canada by the carrier with a CACM, the CBSA advises that the railroad Arrival (WACM) of the first container will Arrive all of the containers and, depending on the release status of the shipment, will trigger the D4 Deconsolidation Notice.

Notices and D4 Deconsolidation Notices

Question 88:

Whose responsibility is to file D4 Deconsolidation Notice?

Answer:

Notices are voluntary. It is the responsibility of the warehouse / terminal / railroad/ airline handler / freight forwarder to subscribe to the Notices.

Question 89:

Can all terminals receive the D4 notice?

Answer:

Both Marine and Rail Terminals are set-up to receive D4 notices. The Air Ground Handlers are inconsistent at this particular point in time. The D4 Deconsolidation Notice is voluntary. Warehouses / terminals must subscribe to the Notices and must have system capable of receiving and personnel trained to operate with the Notices.

Air

Question 90:

Will this new process allow for pick ups direct from the airline of just one HAWB out of a consolidation like in the US as long as the HAWB is cleared?

Answer:

No. Only eDeconsolidation is allowed from a primary (airline) warehouse. Physical deconsolidation must occur from a CW type warehouse.

Question 91:

In regards to the consolidation, most MAWB would show 'Consolidation as per attached'. Would this be considered "consolidated" even if it is only a single MAWB and HAWB?

Answer:

Yes. This is a back-to-back shipment with one house bill. One house bill = one eHBL.

Question 92:

Will there be an option for wheels up entry submission for air shipments?

Answer:

Not for eHBL filings, as "Wheels Up" is only applicable to the MAWB CCN. However, an Integrated Import Declaration (IID) entry can be made up to 90 days before CACM / WACM Arrival. PARS entry types can be made up to 30 days in advance. As per CBSA, RMD entries may be problematic if submitted prior to cargo arrival, as CBSA may either reject them if cargo not arrived (possibly issuing an AMPS penalty), or just release them only upon arrival. Also, there are no status updates on RMD entries once submitted until they have been Arrived. Release status will be advised only when 8000 CCN is Customs released.

Question 93:

For cargo routing CDG-YUL-YEG, when must the eHBL filing be completed? How early can it be completed?

Answer:

eHBL data and the Close Message in the air mode must be filed, in this example, four (4) hours prior to arrival at the first Canadian airport, Montreal. (The First Port of Arrival). Both messages can be filed up to 90 days in advance of CACM / WACM Arrival at YUL.

Question 94:

How should we proceed to inform the sublocation code to file eHBL for air freight shipments which we usually receive it once it's checked in?

Answer:

The CBSA lists all of the sufferance warehouses in Canada with the corresponding sublocation codes. Normally you would know which ground handler/ warehouse handles that airline and so should be able to ascertain the sublocation code in advance. If you don't know, check with the airline. <https://www.cbsa-asfc.gc.ca/import/codes/sw-ea-eng.html>.

Question 95:

Are FROB and In-transit shipment filing requirements for air shipments the same as for ocean shipments?

Answer:

Yes. Freight Remaining on Board and in-transit regulations are the same for air as for marine shipments. If there are no Canadian freight forwarder implications, no Canadian consignee on the master contract of carriage, no Canadian destined house bills, there is no eHBL required. The air carrier will file its mandated ACI data.

Question 96:

If a freight forwarder receives an air consolidation with multiples or one HAWB under a MAWB consigned to the freight forwarder in Canada to be move in bond to another airline to fly out of Canada. What should be done in this case?

Answer:

If the MAWB is consigned to a Canadian destination airport and there are one or more house bills, then the eHBL filing is required. In this scenario, it appears that the eHBLs destined outside Canada would have eHBL Movement Type 'In Transit' and would be acquitted by an outbound MAWB. The CBSA should manually acquit the 8000 CCNs with the outbound MAWB.

Question 97:

What happens when a partial shipment arrives in airfreight, does the same process apply?

Answer:

The eHBL 8000 data and the Close Message will have been filed based on the house airway bill data, the contract of carriage, for the full piece count. There is no requirement for the freight forwarder to make any change to its eHBL data. However, if the freight forwarder chooses to move the cargo that has arrived to its CW sufferance warehouse or if the importer wishes to Customs clear the part that has arrived, then the eHBL would need to be Amended to change the piece count to the 'first part'/ arrived piece count. The Customs Broker would need to make an entry such as an "Entered to Arrive" entry.

Flying Truck

Question 98:

For flying trucks, can Customs clearance be on a PARS issued by the trucker?

Answer:

A true Flying Truck shipment is a road feeder service destined on the MAWB to a Canadian airport. The shipment must be delivered to the airline's warehouse by the trucker, where it is treated like an air shipment. Normally the Customs release request will **not** be on the Highway carrier CCN and will **not** be on the Highway carrier PARS CCN.

Note: If a Customs broker does receive a truck Highway manifest for a Flying Truck shipment (as some of the road feeder service are doing today, or even using an 8000 CCN manifest), then the broker can continue to clear the Customs entries on these manifests, until such time as CBSA provides a clearly defined process for Flying Trucks that all RFS must adhere to.

Question 99:

For Flying Truck, we are aware that these are exempt, but will we still have to transfer it to our 8000 number and for customs clearance? If yes, will the Previous be the MAWB # or the truck bond #?

Answer:

That depends. Each shipment will take specific management and handling. For example, if the eHBL and Close Message are filed and if the Air carrier files its Primary and the warehouse "Arrives" / WACMs the MAWB then the D4 Deconsolidation Notice should flow and it would be like any other air shipment. In this case, the Primary CCN would be the airline MAWB. Or, in the unlikely situation that the Highway carrier files its Highway Primary, then eHBLs could be linked to that Highway Primary CCN.

As of writing [November 2020] *freight forwarders are being advised to handle Flying Truck shipments as they did 'pre-eHBL', basically paper, while exploring to see if an eHBL solution presents itself.*

Question 100:

What do you do if the airline changes the routing from flight to Flying truck but eManifest is already submitted and accepted?

Answer:

The eHBL will have already been filed and if the airline has filed its 'cargo' data then the shipment could be Arrived by the airline and the D4 Deconsolidation Notice would flow, or the shipment could be moved to the freight forwarder's sublocation code as on the eHBL. Otherwise, the eHBL 8000 data can be changed, linked to a different Primary

CCN or even cancelled electronically so while this might be extra work for the freight forwarder, it shouldn't be a problem.

Highway

Question 101:

Considering that freight forwarders are not allowed to use their 8000 code to move the cargo across the border can you please further elaborate on the eManifest for truck loads? Will PARS be no longer in use?

Answer:

You are correct. An 8000 CCN cannot be used to move goods across a border.

In this instance the Highway carrier will file its conveyance and cargo data. And the Highway carrier will provide its **Primary** cargo control number to the freight forwarder. The freight forwarder will file its eHBL data for every house bill on the truck load (one or more) referencing the Highway CCN as the Primary CCN in the eHBL transmission – and referencing that Highway CCN as the **Previous** CCN in the Close Message. The Customs release request will be against the 8000 CCN and it can be a PARS.

The Customs Broker may choose to submit an Integrated Import Declaration (IID), which can be submitted up to 90 days before CACM / WACM Arrival. As per CBSA, RMD entries may be problematic if submitted prior to cargo arrival, as CBSA may either reject them if cargo not arrived (possibly issuing an AMPS penalty), or just only release them upon arrival. Also, there are no status updates on RMD entries once submitted until they have been Arrived. Release status will be advised only when 8000 CCN is Customs released.

Of course, if the Highway carrier pro-bill/ bill of lading is consigned to the importer and its 'conveyance and cargo data' provides the shipper/ consignee details, then that is a direct shipment and not covered by eHBL, because there is no house bill contract of carriage. Everything, including PARS releases would be as they are today.

Question 102:

How does this affect PARS filing for truck shipments to Canada originating from the USA?

Answer:

If the consignee on the Highway carrier pro-bill (bill of lading) is a freight forwarder and there are one or more house bills on that truck pro, then the shipment must have all the eHBL and Close Messages filed within the Highway timeframes, one per house bill. This means that the Customs release request will be on the 8000 CCN and not on the Highway carrier PARS.

Warehouses / Terminals

Question 103:

Would CIFFA reach out to ground handling agents (airline warehouses / CFS warehouses), to ask if they are receiving D4 Deconsolidation Notices. That was one of the biggest issues previously in terms of visibility of data.

Answer:

It is important that all warehouses / terminals/ airline handling agents receive the D4 Deconsolidation Notices. CIFFA is undertaking communications with airline ground handling agents to underscore the importance.

Question 104:

How will the deconsolidation warehouse know that the goods are 'in transit' and permitted to move onwards out of their warehouse. For example, six of seven house bills are Import for clearance at the CW warehouse and one house bill is to move onwards in-transit to a Customs port of exit. How would the warehouse know okay to release to the trucker?

Answer:

CBSA advises that when the warehouse transmits the WACM on Arrival, if the sublocation code on the eHBL is not its sublocation code, the message back will be "Ports Do Not Match". This means that the house bill is not 'Arrived' and remains on the 8000 CCN and on the freight forwarder's liability. (Liability does not transfer to the warehouse as the shipment was not 'Arrived.") Of course, the CW deconsolidation warehouse should also have load manifests etc. indicating the final destination of each house bill.

Note: This is a perfect example of how Manifest Forward and the Secondary Notify Party along with SNP Business Instructions and Shipment Handling Instructions fields can be used to send the eHBL data reported for clearance / exit in the same port or another port to the destuffing warehouse so they are aware of what will happen to all eHBL shipments in that container.

Resources

D3-1-1 Policy Respecting the Importation and Transportation of Goods:	https://www.cbsa-asfc.gc.ca/publications/dm-md/d3/d3-1-1-eng.html
D3-3-1 Freight Forwarder Pre-arrival and Reporting Requirements:	https://www.cbsa-asfc.gc.ca/publications/dm-md/d3/d3-3-1-eng.html
eCCRD Chapter 5 v4.0 Sept 2016: eManifest <i>and</i> ADDENDUM v2.0 Feb 2020: Appendix A: Glossary of Terms Appendix B: Data Elements Appendices C through I	Order from: tccu-ustcc@cbsa-asfc.gc.ca Both combined = complete set of requirements for <i>House Bill</i> and <i>House Bill Close Message</i> .
eCCRD Chapter 8: Advance Commercial Information (ACI)/eManifest Portal - House Bills (Freight Forwarder Portal)	https://www.cbsa-asfc.gc.ca/prog/manif/eccrdhi-deccerout-chap8-eng.html
eCCRD Chapter 11 Notices v6.1, December 2019 and all Appendices (Notices) <i>and</i> Notices ADDENDUM v2.0, February 2020:	Order from: tccu-ustcc@cbsa-asfc.gc.ca
CBSA eManifest Portal:	https://www.cbsa-asfc.gc.ca/prog/manif/portal-portail-eng.html
CBSA eManifest Program:	https://www.cbsa-asfc.gc.ca/prog/aci-manif-ipec/menu-eng.html
Software Service Providers:	https://www.cbsa-asfc.gc.ca/eservices/sp-fs/service-eng.html
Generic Sub-location Codes	https://www.cbsa-asfc.gc.ca/import/codes/generic-eng.html
Sufferance Warehouse Operators and Sublocation Codes (and related CBSA port):	https://www.cbsa-asfc.gc.ca/import/codes/sw-ea-eng.html
CIFFA eManifest Q&A:	https://www.ciffa.com/download/factsheet/eManifest-Questions-and-Answers-Updated-July-4-2019.pdf
EDI / Response Error Codes (ALL):	http://cbsa.gc.ca/eservices/error-erreur.pdf