



Red Tape
Awareness Week™



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2026

WORST OF THE WORST

Stifling, not simplifying trade: CBSA Assessment and Revenue Management (CARM)

Recipient: Canada Border Services Agency (CBSA)

The CBSA Assessment and Revenue Management (CARM) system was supposed to simplify how businesses pay duties and taxes. Instead, since its launch in October 2024, it's become a frustrating and confusing system for many small businesses. At a time of growing trade tensions with the U.S., the last thing small importers needed was more red tape. Yet CARM delivered exactly that: a confusing, time-consuming portal that disrupted day-to-day operations and added new costs.

Over a year after its launch, many small firms are still struggling just to register. The onboarding process is buried in paperwork, from requirements around tracking import numbers to answering detailed shipping questions. To make matters worse, as of May 2025, the Release Prior to Payment (RPP) program, which was built with big businesses in mind, became mandatory for all businesses to have their goods released at the border. As one transportation company in Alberta put it:

“As a small importer of ATV, snowmobile, motorcycle, and marine parts, our orders have typically been about \$1,000/month, but once a year we will have a big order of approximately \$55,000, which means we have to pay \$12,000 a year for a surety bond/cash to be tied up. It seems to make no sense.”

CFIB's April 2025 data found that only 37% of small firms had been enrolled in the RPP program. The requirement to either post a cash deposit or bond has proven unworkable for businesses with limited cash flow, making trade more expensive and complex. For some, the only remaining option is to physically go to the border to have their shipments cleared—a completely impractical solution for busy entrepreneurs trying to keep their businesses afloat.

Compounding the problem are system outages, ongoing technical issues, and frequent billing errors, combined with short billing cycles that strain cash flow. Support delays further exacerbate these issues, leaving small businesses to contend with these challenges on their own.

A major contributor to the chaos has been the transition process. CARM was rolled out without sufficient time for businesses to adapt just as tariffs were being introduced, making a complex process even more confusing. By contrast, the Canada Revenue Agency's My Business Account (MyBA) took several years before becoming mandatory, allowing the Agency to refine the system, educate users, and work through operational challenges. CBSA should have taken a similar phased approach, especially given the scope, timing, and sensitivity of CARM.

The fix: CBSA should simplify the onboarding process, exempt small and medium-sized businesses from RPP security requirements, and fix technical glitches. Additionally, CBSA should consider waiving CARM-related penalties and prioritize education and responsiveness during the system's early years to allow businesses to adapt without undue stress.

HONOUREE

Quebec's Bill 29: "You'll need another warehouse"

Recipient: Government of Quebec

As of October 2025, Quebec retailers now must guarantee access to spare parts, repair services, and maintenance information for every product they sell with more than one component. If this cannot be guaranteed, they must provide a written waiver for each item sold. Manufacturers must also supply similar documentation.

For each product sold online, retailers must provide a link leading to the manufacturer's information on where consumers can access spare parts, repair services, and maintenance information. These requirements are nearly impossible to implement, especially for small businesses who are often the last link in the supply chain, due to the sheer volume of products and lack of access to technical data. Quebec businesses, especially SMEs, rely heavily on suppliers from outside the province, limiting their control over repairs and access to parts.

Despite calls for clearer rules and realistic timelines by many organizations, including CFIB, Quebec's government has not made any adjustments to the program. The law also imposes severe penalties, up to \$3,500 per day in administrative fees and \$175,000 in criminal fines. Even a few days of administrative penalties could disrupt a small business enough for it to close.

The fix: CFIB collaborated with the Fédération des chambres de commerce du Québec (FCCQ) on a [submission to the Quebec government](#) (French only) which advocated for an approach that favoured incentives over punitive measures. The approach also recommended avoiding adding regulatory, administrative, and financial burden on businesses, supporting the competitiveness of local manufacturers and retailers against foreign firms, and prioritizing local purchasing in the circular economy.

CFIB recommends exempting microenterprises and small retailers from the obligation to repair products for free and requiring consumers to contact the manufacturers directly to have their legal warranty of proper functioning honoured.

HONOUREE

Warmth needs a permit (apparently): Metro Vancouver's fireplace registry

Recipient: Metro Vancouver Regional District (MVRD)

Metro Vancouver residents were feeling the heat in 2025, as they were forced to register their fireplaces or face up to \$500 in fines. This measure adds red tape for residents across the region, with little evidence it will achieve Metro Vancouver's stated goal of cleaner air. Instead of incentivizing upgrades to modern, efficient appliances, Metro Vancouver chose a punitive approach that creates confusion, stress, and unnecessary paperwork for over 100,000 households.

Once registered, Metro Vancouver only permits residents to operate in compliance with the Residential Indoor Wood Burning Emission Regulation Bylaw. Where applicable, registrants are required to know and enter the fireplace make, model, and emission rate (in grams per hour), and upload supporting documentation.

As of September 15, 2025, residents with traditional "open" wood-burning fireplaces were banned from using wood and now may only use manufactured fire logs. To burn regular wood, residents must pay out of pocket to upgrade to an emissions-certified fireplace.

Other restrictions include what paper can be used to start a fire, the size and temperature of the fire, and specific rules for maintaining the fire for overnight heating. Although registration is free, those found in non-compliance with either the registry or bylaws can face up to \$500 in fines.

The MVRD's fireplace registry is just the latest example of local governments attempting to "leapfrog" provincial standards. The province can, and should, ensure a single standard for environmental policies to avoid municipal patchworks that hurt businesses and confuse taxpayers.

The fix: Instead of leaving taxpayers out in the cold, Metro Vancouver should be sparking a positive conversation about how best to incentivize upgrades to newer, modern fireplace equipment. Current incentive programs, such as the MVRD's Community Wood Smoke Reduction Program, are complicated and cannot accommodate the large number of homeowners affected. The province of British Columbia should further ensure a single, common set of regulations when it comes to its climate policies.

