

**American Wire Producers Association (AWPA)**  
**Quarterly Trade Policy Report**  
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**I. Section 232 Tariffs: Steel and Aluminum**

*A. February 2025 Expansion*

As previously detailed, on February 10, 2025, President Trump issued Proclamations [10896](#) and [10895](#) to modify the existing Section 232 steel and aluminum tariffs – initially imposed in 2018 during his first term. According to a White House [Fact Sheet](#), the actions taken by the President were intended to “close existing loopholes and exemptions to restore a true 25% tariff on steel and elevate the tariff to 25% on aluminum.”

Changes directed in the February 10 Proclamations largely took effect on March 12, 2025. They included: (1) terminating country-specific arrangements such as full exemptions, quotas, or tariff-rate quota programs; (2) eliminating the company-specific exclusion process and terminating all Generally Approved Exclusions (“GAE”); (3) increasing the tariff rate applicable to aluminum articles from 10 to 25 percent; and (3) including numerous downstream or “derivative” products within the remedy.

On May 30, 2025, President Trump [announced](#) plans to increase the steel and aluminum tariffs from 25 to 50 percent, effective June 4. The President issued a [Proclamation](#) on June 3 to implement the rate increases on both imports of steel and aluminum articles within the scope of the initial Section 232 investigation and tariffs put in place in March 2018, as well as the derivative products that were subsequently identified and are subject to Section 232 tariffs.

Notably, for steel, aluminum, and steel and aluminum derivative products, the increased 50 percent tariff applies to steel or aluminum content and any applicable reciprocal tariff (*discussed in Section IV below*) applies to the balance of content. This is a change from the April 2, 2025 Executive Order in which the President exempted products subject to Section 232 tariffs from the global reciprocal tariffs. This is also a change with respect to derivative products classified in Chapters 73 and 76, where the 25 percent tariff had previously applied to the entire value of the import. With the June 4 Proclamation, the 50 percent tariff increase will apply only to the steel or aluminum content, while the balance will be subject to any applicable global reciprocal tariff.

*B. Coverage of Additional Derivative Products*

The President’s February 10 Proclamations also announced the imposition of a 25 percent tariff on a wide range of steel-intensive and aluminum-intensive derivative products. The Proclamations noted that the increase in imports of these and other derivative products has eroded the domestic industry’s customer base and caused declining demand for U.S.-produced steel and aluminum. Coverage of such derivative products is contemplated in the statute, and President Trump took action on derivative products during his first term, issuing [Proclamation 9980](#) in January 2020 to add a handful of derivative products to the remedy. The expanded derivative

product coverage went into effect March 12, 2025. A full list of the HTSUS codes affected by the President's action on derivative products can be found [here](#) (steel) and [here](#) (aluminum).

Subsequently, and as directed by the February 10 Proclamations, the Commerce Department on May 2, 2025, published an [Interim Final Rule](#) (IFR) establishing a process for including additional derivative aluminum and steel articles within the scope of the Section 232 remedy. While the Commerce Department's Bureau of Industry and Security ("BIS") will continue to accept public comments on the IFR until June 16, it took effect April 30, 2025.

BIS has established three distinct two-week windows annually for the submission of requests to add additional steel and aluminum articles to the derivative products lists. The three windows are the beginning of May, September and January, with the first window (opened on May 1, 2025) now closed. Submissions of inclusion requests must provide the following information:

- Identification of the applicant (must be a U.S. producer of steel or aluminum articles or derivative articles or an association representing one or more such producers);
- A precise definition of the derivative article;
- The 8- or 10-digit HTS classification to be included on the list;
- An explanation of why the article is a steel or aluminum derivative, including (as possible) information on the value of the steel or aluminum content as a share of the derivative article's overall value;
- Pertinent information on the domestic industry affected;
- Statistics on imports and domestic production; and
- A description of how imports of the derivative article threaten to impair national security.

After conclusion of the two-week submission window, BIS will post non-confidential versions of all valid requests for a 14-day public comment window on [regulations.gov](#) (the public comment period for the May application window closed on June 4, 2025). BIS' posting of accepted inclusion requests confirms the agency's acceptance of the request and initiates a 60-day timeline for the agency to process the request and issue a final determination. Accepted requests will be assessed for whether the described article at the 8- or 10-digit HTS level is a derivative steel or aluminum article, as well as whether imports of the derivative article have increased in a manner that threatens to impair national security or otherwise undermine the objectives set forth in the Section 232 reports or related Inclusions Proclamations. At the end of the 60 day period, the Secretary of Commerce will issue a positive or negative determination on each request and BIS will post the results. A [Federal Register](#) notice will be issued to modify the Annexes to the Inclusions Proclamations to add the new derivative products. Duties on the newly included derivative articles will take effect "shortly thereafter" through coordination with U.S. Customs and Border Protection.

## **II. Section 232 Investigation: Critical Minerals**

On April 15, 2025, President Trump issued an Executive Order ([E.O. 14272](#)) directing a Section 232 investigation to determine the effects on national security of imports of processed critical minerals and their derivative products. BIS [initiated](#) the investigation on April 22, and a public comment period closed May 16, 2025.

The product scope of the investigation is wide-ranging. The E.O. defines “processed” critical minerals as critical minerals “that have undergone the activities that occur after critical mineral ore is extracted from a mine up through its conversion into a metal, metal powder or a master alloy.” Further, the E.O. states that critical minerals include all minerals identified on the United States Geological Survey’s (USGS) critical mineral list, as well as any rare earth metals defined by the Department of Energy. The investigation also covers derivative products, which are defined extremely broadly to include such downstream products as electric vehicles, batteries, magnets, and cell phones.

Notably, the E.O. instructed the Secretary of Commerce to provide the Secretaries of Treasury and Defense, the U.S. Trade Representative (USTR), the Assistant to the President for Economic Policy, and the Senior Counselor to the President for Trade and Manufacturing with a report for internal review and comment within 90 days, so the investigation appears likely to move quickly.

## **III. Section 232 Actions Broadly**

### *A. Continued Focus on Sectoral Tariffs*

As addressed above, and in a trend that began during his first term, President Trump continues to make liberal use of Section 232 of the Trade Expansion Act of 1962 to investigate the effects of imports from a wide-range of sectors on the national security. Given ongoing legal challenges to broader tariff programs put in place under the International Emergency Economic Powers Act (IEEPA) (*discussed in further detail below*), and given the Court’s general approval of the first Trump Administration’s use of Section 232 to impose tariffs on steel and aluminum, it is likely that President Trump will continue to focus on Section 232 sectoral tariffs as a key element of his trade policy agenda.

As is the case with steel, many of the products that fall within the scope of ongoing Section 232 investigations have already been excluded from the IEEPA reciprocal tariffs implemented by the Administration. If tariffs are ultimately imposed on any of the products subject to these investigations, they will remain exempt from the reciprocal tariffs. *A chart of Section 232 actions and pending investigations initiated during President Trump’s second term is included below in Appendix A.*

### *B. Possible Bilateral Exemptions*

As discussed in more detail below, the Trump Administration is pursuing dozens of bilateral trade negotiations in an attempt to achieve further reciprocity with key trading partners. While these negotiations are driven in large part by the Administration’s reciprocal tariff regime,

it has become clear that the desire of our trading partners to achieve relief from certain sectoral tariffs imposed under Section 232 is also on the table.

Specifically, less than two months after President Trump terminated a host of country-specific arrangements exempting trading partners from the steel and aluminum tariffs, the Trump Administration and the government of the United Kingdom (UK) [announced](#) an “agreement in principle” on May 8, 2025, that includes a quota – at most favored nation rates – for UK steel and aluminum. The agreement also conditions the quota on the UK government ensuring that the Chinese-owned British Steel plant is not exploited by the Chinese and used as a backdoor to circumvent U.S. tariffs.

The United States and the UK also agreed to an alternative arrangement for the Section 232 tariffs on UK automobiles. Under the agreement, the first 100,000 vehicles imported into the United States by UK car manufacturers each year are subject to a 10 percent reciprocal tariff, and any vehicles exceeding that volume are subject to a 25 percent tariff. With respect to any remedies imposed as a result of the pending Section 232 pharmaceutical investigation, the governments committed to “promptly negotiate significantly preferential treatment outcomes.” More broadly, the agreement in principle also sets forth a path for the adoption of a “structured, negotiated approach to other sectors that may be subject to Section 232 investigations or other tariff measures with a view to a significantly preferential outcome.”

Whether such relief from sectoral tariffs is replicated in other bilateral deals remains to be seen, but it is likely to be a priority for many trading partners in seeking to engage the Trump Administration. Notably, in recent days, reports have indicated that the Trump Administration may be contemplating a deal with Canada and Mexico that would remove the Section 232 steel tariffs on imports from those countries up to a certain volume.

#### **IV. International Emergency Economic Power Act (IEEPA) Tariffs**

##### *A. IEEPA Litigation and Outlook*

Several recent court rulings have complicated President Trump’s trade and tariff agenda, threatening the future of various tariffs imposed pursuant to the International Economic Emergency Powers Act (“IEEPA”), as well as the bilateral trade negotiations undertaken in large part as a result of the leverage afforded by those tariff actions.

At least seven lawsuits have been filed in various district courts, including the U.S. Court of International Trade (CIT), challenging President Trump’s use of IEEPA to impose tariffs on Canada, China, and Mexico to deal with fentanyl trafficking (and immigration concerns for Canada and Mexico), as well as reciprocal tariffs on all countries to address trade imbalances. President Trump’s invocation of IEEPA as the basis of tariff actions is novel, and the cases challenge whether the statute supports a broad exercise of presidential authority to impose such tariffs.

So far, opinions have been issued in three cases. First, in V.O.S. Selections, Inc. v. Trump and State of Oregon v. Trump (which were consolidated), the CIT held that IEEPA does not authorize the tariffs, as the trafficking-related and reciprocal tariffs exceed the statute’s limits on presidential authority. Second, in Learning Resources, Inc. v. Trump, the District Court for the

District of Columbia, also determined that the President exceeded his authority under IEEPA in issuing the tariffs.

The CIT issued a permanent injunction against the IEEPA-related tariffs and ordered the Administration to issue Executive Orders effectuating the injunction within 10 days, which the government appealed to the Court of Appeals for the Federal Circuit (CAFC). The government also moved to stay the ordered relief, and the CAFC granted a temporary administrative stay of the CIT's permanent injunction to allow the CAFC to reach a decision on the government's motion to stay. The CIT subsequently ordered that the government's motion to stay enforcement of the permanent injunction be held in abeyance pending the CAFC's consideration of the government's stay motion, meaning that the government could continue to collect the contested tariffs for now. The CAFC, on June 10, rendered a decision on the government's stay motion, granting the motion and ordering the parties to jointly file a proposed expedited briefing schedule with oral argument planned to be held on July 31 and before the court *en banc*. Based on this schedule, the CAFC is likely to issue a decision on the merits of the case by not later than the middle of September.

The District Court, similarly, issued a preliminary injunction that was stayed for two weeks to permit the government to appeal. In that time, the government has appealed the District Court's decision to the U.S. Court of Appeals for the DC Circuit, which on June 3 stayed the preliminary injunction pending appeal and granted the government's motion to expedite the appeal.

Further appeals to the U.S. Supreme Court are expected. Looking ahead, should the IEEPA tariffs be overturned, the Trump Administration is purportedly developing a "Plan B" that would involve the continued imposition of similar tariffs, but under a different legal authority. A possible two-step option would be to utilize Section 122 of the Trade Act of 1974, which allows for tariffs of up to 15 percent for 150 days to address trade imbalances, while pursuing separate, longer-term tariff programs for trading partners under Section 301 of the 1974 law (the authority relied on by President Trump to impose broad-based tariffs on imports from China in 2018 and 2019).

Notably, national security tariffs imposed under Section 232 of the Trade Expansion Act of 1962 on steel and aluminum articles, their derivatives, and automobiles and auto parts, all remain in place and are not covered by this litigation. Pending Section 232 investigations being conducted by the Trump Administration – e.g., the critical minerals investigation – also are not affected. Section 301 tariffs imposed by President Trump (during his first term) on a wide range of Chinese goods also remain in place.

### *B. Reciprocal Tariffs*

On April 2, 2025, President Trump signed an Executive Order ([E.O. 14257](#)) imposing reciprocal tariffs on most nations under IEEPA in response to a declared national emergency posed by "large and persistent trade deficits." The tariffs set forth in the E.O. included a baseline rate of 10 percent, as well as higher rates for dozens of trading partners, particularly those maintaining large trade surpluses with the United States. As of this writing, those higher tariffs have been suspended while the United States pursues reciprocal trade deals with various trading partners – a process further complicated by the recent court rulings detailed above.

The reciprocal tariffs do not apply to goods originating in Canada and Mexico, although such goods will continue to be subject to the fentanyl-related IEEPA tariffs that took effect in early March and the exemption for USMCA-qualifying goods from Canada and Mexico will continue to apply (*see below for additional details*). Additionally, the reciprocal tariffs do not apply to countries that are not covered by Normal Trade Relations (*i.e.*, Cuba, North Korea, Russia, and Belarus).

As noted above, the reciprocal tariffs do not apply to certain goods, primarily those goods already subject to (or likely to soon be subject to) sectoral tariffs, including steel and aluminum articles and their derivatives. Other goods not subject to the reciprocal tariff include: automobiles and automobile parts that are subject to Section 232 tariffs; copper / copper derivatives, pharmaceuticals, semiconductors, and lumber articles that may soon be subject to Section 232 tariffs; and “all articles that may become subject to future Section 232 tariffs.” Also excluded are energy and energy products and certain critical minerals.

Additionally, the reciprocal rates only apply to the non-U.S. content value of goods where at least 20 percent of the value is U.S. originating. U.S. content is defined as “the value of an article attributable to the components produced entirely, or substantially transformed in, the United States.” CBP is authorized to collect information necessary to verify the U.S. content value of an imported article, and whether it is substantially finished in the United States.

The currently paused individual country rates – some as high as 50 percent – can be found in Annex I of the E.O., while those products exempted from coverage, including steel products, are detailed in Annex II.

### *C. Reciprocal Tariff Effective Dates*

The baseline reciprocal tariff of 10 percent took effect on April 5, 2025. In response to economic concerns and market turmoil, President Trump paused implementation of the higher individual country rates for most countries – China and Hong Kong being the exception – just hours after they took effect at 12:01 a.m. EDT on April 9, 2025. The 90-day pause ordered by the President is set to expire on July 8, 2025.

Separately, after an initial series of tariff escalations between the United States and China – during which the United States raised its reciprocal tariff on China to 125 percent and China matched that rate for its retaliatory measures on U.S. exports – the two countries announced in a [statement](#) on May 12, 2025, a similar 90-day reprieve. Specifically, effective May 14, the United States reduced to 10 percent the reciprocal tariff on imports from China, and China in turn reduced to 10 percent its retaliatory tariffs on U.S. goods. China also pledged “to adopt all necessary administrative measures to suspend or remove the non-tariff countermeasures taken against the United States since April 2, 2025.” During this three-month period, which expires on August 14, the two sides will continue their efforts to negotiate a trade agreement. After a bumpy start to implementation of the May 12 trade truce, officials from the two governments met in London this week and [negotiated](#) a framework to get the talks back on track.

The reciprocal tariffs are in addition to certain other applicable duties, including those required by antidumping and/or countervailing duty orders, Section 301 tariffs, and normal customs duties. In the case of China, for example, covered goods are now subject to the 10 percent reciprocal tariff, plus the current 20 percent IEEPA (fentanyl-related) tariff, plus any applicable Section 301 duties and AD/CVD duties.

#### *D. Reciprocal Trade Deals*

As noted above, the Trump Administration is utilizing the leverage afforded by the reciprocal tariffs – and the 90-day pause – to press trading partners to address a variety of tariff and non-tariff barriers affecting U.S. trade. While partial progress has been made with some countries like the U.K. and China, as described above, most are deep in negotiations with uncertain outcomes. While the shaky legal landscape of the IEEPA tariffs reduces U.S. negotiating leverage, the specter of the President imposing tariffs under other authorities is likely enough to keep trading partners at the negotiating table for now.

Trump Administration officials have repeatedly suggested that dozens of deals will be rolled out ahead of the July 8 expiration of the 90-day pause. Notably, the U.S.-UK agreement in principle announced on May 8 provides some clues as to what future deals might look like. Specifically, any near-term announcements are likely to: (1) be high-level, with many details to be ironed out subsequently; (2) maintain the 10 percent baseline reciprocal tariff (and some countries may settle somewhere between that baseline and their initially-assigned individual rate); and (3) contemplate some relief from the various U.S. sectoral tariff programs, as discussed above. Such deals are not anticipated to require Congressional approval.

U.S. Treasury Secretary Scott Bessent has recently warned that nations not negotiating in good faith will be unilaterally assigned IEEPA tariff rates, possibly matching the country-specific rates announced in the April 2 Executive Order. He has also suggested that for those governments negotiating in good faith, “we will roll the date forward” to continue the negotiations.

#### *E. Fentanyl-Related IEEPA Tariffs*

As previously detailed, on February 2, 2025, President Trump issued three Executive Orders placing additional duties on all imports from Canada, Mexico, and the People’s Republic of China (PRC) (including Hong Kong) under IEEPA, and pursuant to his declared national emergency “with respect to the grave threat to the United States posed by the influx of illegal aliens and drugs into the United States.”

A 10 percent tariff on all Chinese imports into the United States took effect for goods entered or withdrawn for consumption on or after 12:01 am February 4, except for goods already in transit as of 12:01 am February 1. Subsequently, effective at 12:01 am March 4, President Trump doubled the tariff rate to 20 percent.

Bilateral negotiations between the United States and Mexico and the United States and Canada – and actions by the Mexican and Canadian Governments to further strengthen their border security measures – resulted in a 30-day delay of the IEEPA tariffs on those countries. Upon the expiration of that delay, however, a 25 percent tariff on all Canadian and Mexican imports into the



United States took effect on March 4. In part due to the concerns of the U.S. automotive industry, President Trump quickly modified the tariffs, exempting all goods that satisfy U.S.-Mexico-Canada Agreement (USMCA) rules of origin.

As of this writing, the 25 percent IEEPA tariff applies to goods imported from Canada and Mexico that do not satisfy USMCA rules of origin. A lower 10 percent tariff is assessed on potash as well as energy and energy resources – including certain critical minerals – imported from Canada that fall outside the USMCA preference. Critical minerals subject to the lower 10 percent tariff are limited to those that appear on the list published by the Department of the Interior’s U.S. Geological Survey.

## **V. Tariff Stacking Executive Order**

On April 29, 2025, President Trump issued an Executive Order ([E.O. 14289](#)) to “avoid the cumulative effect of overlapping tariffs on certain articles” (often called tariff “stacking”). The E.O. sets out a procedure for determining which tariffs apply to an article when that article is subject to more than one of the five covered tariff actions taken by the President. Covered tariff actions include: (1) the Section 232 Auto/Auto Parts tariffs; (2) the Canada IEEPA (fentanyl and immigration) tariffs; (3) the Mexico IEEPA (fentanyl and immigration) tariffs; (4) the Section 232 Steel tariffs; and (5) the Section 232 Aluminum tariffs. The idea appears to be to have products, particularly those being imported from Canada and Mexico, generally covered by only one rather than multiple tariff regimes.

For articles subject to more than one of the five tariff actions, filers will pay duty in accordance with the prioritization below, which reflects a revised priority order directed in the President’s June 2, 2025, Proclamation increasing the Section 232 steel and aluminum tariffs. Note that U.S. Customs and Border Protection (“CBP”) has provided guidance that “subject to” means that a duty more than 0% is owed under the tariff action.

- An article subject to the Automobile and Auto Parts Section 232 is not subject to the 232 Aluminum, 232 Steel, Mexico IEEPA (fentanyl), or Canada IEEPA (fentanyl) tariffs.
- An article subject to tariffs pursuant to the 232 Aluminum or 232 Steel duties is not subject to the Canada IEEPA (fentanyl) or Mexico IEEPA (fentanyl) orders.
- An article *can be* subject to both the Aluminum Section 232 and Steel Section 232 orders if it meets the requirements of both (i.e., is listed in both and contains both steel and aluminum).
- Other tariffs and duties not covered by the E.O. are cumulative with one another and with these tariffs, as well.

The E.O. was applied retroactively to entries of merchandise subject to the five applicable tariff measures and entered for consumption or withdrawn from warehouse for consumption on or after March 4, 2025. The modified stacking order took effect June 4, 2025. U.S. importers may request a refund of the duties paid but no longer owed pursuant to E.O. 14289.



## **VI. Retaliatory Tariffs**

With the exception of China – and, to a lesser extent, Canada – most trading partners have been slow to impose retaliatory measures on U.S. exports in response to President Trump’s second term tariff actions. *A summary of current and pending retaliatory actions is included below in Appendix B.*

## **VII. China Shipbuilding Section 301 Remedy**

In March 2024, five labor unions filed a petition requesting an investigation into “the acts, policies, and practices of China targeting the maritime, logistics, and shipbuilding sectors for dominance.” President Biden’s U.S. Trade Representative [initiated](#) an investigation last spring and on January 16, 2025, [announced](#) it had determined that China’s targeting of the sectors for dominance is actionable under Section 301. On February 21, 2025, President Trump’s U.S. Trade Representative [announced](#) its proposed actions in response to the determination.

Subsequently, on April 17, 2025, USTR [announced](#) its remedy, stating that the actions “balance the need for action and the importance of limiting disruption for U.S. exporters.” Notably, USTR walked back the \$1 million+ per ship entrance fee that was included in the remedy options put forward in February, and settled on a phased-in tonnage-based fee.

The following fees will begin to be phased in starting on October 14, 2025 (*i.e.*, for the first 180 days, the applicable fees will be set at \$0):

- Fees on vessel owners and operators of China based on net tonnage per U.S. voyage, increasing incrementally over the following years;
- Fees on operators of Chinese-built ships based on net tonnage or containers, increasing incrementally over the following years; and
- To incentivize U.S.-built car carrier vessels, fees on foreign-built car carrier vessels based on their Car Equivalent Unit (CEU) capacity.

A second phase will not take place for three years and will impose limited restrictions on transporting liquified natural gas (LNG) via foreign vessels.

On June 6, 2025, USTR [opened](#) another public comment process to consider proposed modifications to certain aspects of the remedy announced in April. Specifically, USTR has proposed (1) modifying the fee on foreign-built car carrier vessels to change the basis of the fee to net tons (expected to lower the fees significantly) and (2) exempting from the fee U.S.-owned or U.S.-flagged vessels enrolled in the Maritime Security Program. USTR has also proposed modifying the LNG tanker provisions. The deadline for submission of comments is July 7, 2025.

## **VIII. Trade Legislation**

While President Trump has been touting the revenue-raising aspect of his myriad tariff actions, Congressional Republicans have not moved to codify them in the pending budget reconciliation legislation – with one exception. Specifically, the *One Big Beautiful Bill Act*, which

passed by the House of Representatives in late May by the slimmest of margins, includes a provision to repeal the so-called *de minimis* exception for commercial shipments by July 2027. Under *de minimis*, shipments valued at less than \$800 can enter the United States duty-free. The *de minimis* exception has been under increasing – and bipartisan – scrutiny in recent years, particularly given concerns related to national security and drug trafficking as well as tariff evasion. And while the President has eliminated the *de minimis* exception via executive action for packages from China and Hong Kong (and has taken an initial step to do so globally), such actions remain in legal limbo for the time being, and – further – only Congress can repeal *de minimis* outright. Given that *de minimis* repeal is estimated to raise just shy of \$40 billion in revenue, the provision is likely to remain in the final budget reconciliation bill, should it make it through the Senate and across the finish line.

As previously reported, Congressional Democrats have put forward a number of bills and resolutions attempting to rein in the President’s tariff authority. While Congressional Republicans have largely rebuffed these efforts, a handful have crossed the aisle in support of such legislation. Specifically, on April 2, 2025, the Senate passed a joint resolution (S.J.Res. 37) to terminate the fentanyl-related national emergency serving as the basis for the IEEPA tariffs on Canada. The vote was 51-48, with four Republican Senators – Collins (R-ME), McConnell (R-KY), Murkowski (R-AK), and Paul (R-KY) – voting in favor. House GOP leaders will keep the resolution from hitting the floor in that chamber. Subsequently, on April 30, a separate resolution targeting the global IEEPA reciprocal tariffs was defeated 49-49, with Vice President Vance casting the tie-breaking vote (Senators McConnell (R-KY) and Whitehouse (D-RI) missed the vote, but would have likely voted in favor). Again, House consideration is not expected.

Later this year, the upcoming reauthorizations of the African Growth and Opportunity Act (AGOA) and Haiti / HOPE programs – set to expire September 30, 2025 – could drive a more comprehensive trade package, as could a bipartisan Senate [bill](#) to modernize U.S. customs laws. Should a vehicle emerge, there remains bipartisan interest in trade enforcement legislation, including three AWWA-endorsed bills:

- The Protecting American Industry and Labor from International Trade Crimes Act ([H.R. 1869](#)), which directs the U.S. Department of Justice to establish a new task force dedicated to investigating and prosecuting international trade crimes, including customs fraud, duty evasion, and transshipment, and authorizes critical funding for these efforts;
- The Leveling the Playing Field 2.0 Act ([H.R. 1548](#) / [S. 691](#)), which would update U.S. trade laws to ensure that domestic industries are able to pursue and rely on remedies to address new and evolving unfair trade practices such as cross-border subsidies (e.g., China’s “Belt and Road” initiative) and “country hopping” to evade application of antidumping and countervailing duty orders; and
- The Fighting Trade Cheats Act ([H.R. 1284](#)), which would give U.S. Customs and Border Protection more tools to combat and deter customs fraud.

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### Appendix A: Section 232 Actions / Pending Investigations

Investigation	Date Announced	Products Covered	Tariff	Last Action
Steel and Aluminum Imports ( <i>expansion</i> )	<a href="#">Proclamation 10895</a> (aluminum) <a href="#">Proclamation 10896</a> (steel) (2/10/2025)	Steel, aluminum, and derivative products of steel and aluminum	25%	3/12/2025 effective date for expansions  4/30/2025 effective date for derivatives inclusion <a href="#">interim final rule</a> ; comments due 6/16/2025
Automobiles and Automobile Parts Imports	<a href="#">Proclamation 10908</a> (3/26/2025)  Amended by <a href="#">Proclamation 10925</a> (4/29/2025)	Passenger vehicles, light trucks, and certain automobile parts	25% <i>For USMCA qualifying imports, tariffs only applied to non-US content</i>	4/3/25 effective date for vehicles  5/3/25 effective date for parts  <i>Relied on DOC report from 1<sup>st</sup> term</i>
Copper Imports	<a href="#">E.O. 14220</a> (2/25/2025); BIS Notice <a href="#">90 FR 11940</a>	Copper in all forms, including raw mined copper, copper concentrates, refined copper, copper alloys, scrap copper, and derivative products		3/10/2025 initiation; 4/1/2025 comment deadline
Wood Products Imports	<a href="#">E.O. 14223</a> (3/1/2025) BIS Notice <a href="#">90 FR 11941</a>	Timber, lumber, and their derivative products		3/10/2025 initiation; 4/1/2025 comment deadline
Pharmaceutical Imports	BIS Notice <a href="#">90 FR 15951</a>	Pharmaceuticals and pharmaceutical ingredients		4/1/2025 initiation; 5/7/2025 comment deadline
Semiconductor Imports	BIS Notice <a href="#">90 FR 15950</a>	Semiconductors and semiconductor manufacturing equipment, and their derivative products		4/1/2025 initiation; 5/7/2025 comment deadline
Processed Critical Minerals Imports	<a href="#">E.O. 14272</a> (4/15/2025); BIS Notice <a href="#">90 FR 17372</a>	Processed critical minerals and derivative products (including semi-finished and finished products)		4/22/2025 initiation; 5/16/2025 comment deadline
Truck Imports	BIS Notice <a href="#">90 FR 17371</a>	Medium-duty trucks, heavy-duty trucks, and medium- and heavy-duty truck parts, and their derivative products		4/22/2025 initiation; 5/16/2025 comment deadline
Aircraft and Jet Engines Imports	BIS Notice <a href="#">90 FR 20273</a>	Commercial aircraft and jet engines, and parts for commercial aircraft and jet engines		5/1/2025 initiation; 6/3/2025 comment deadline

## Appendix B: Current and Pending Retaliatory Actions in Response to New U.S. Tariffs

U.S. Action	Government	Description	Effective Date
Section 232 Steel and Aluminum Tariffs	Canada	25% tariffs on a list of steel products worth \$12.6 billion and aluminum products worth \$3 billion, as well as additional imported U.S. goods worth \$14.2 billion, for a total of \$29.8 billion. The list of additional products affected by counter tariffs includes tools, computers and servers, display monitors, sport equipment, and cast-iron products.	March 13, 2025
IEEPA Fentanyl Tariffs	Canada	25% tariffs on 1,256 products worth \$30 billion, including orange juice, peanut butter, wine, spirits, beer, coffee, appliances, apparel, footwear, motorcycles, cosmetics, and certain paper products.	March 4, 2025
Section 232 Auto / Parts Tariffs	Canada	25% tariffs on non-USMCA qualifying vehicles from the United States; 25% tariffs on non-Canadian and non-Mexican content of USMCA-qualifying vehicles from the United States. <i>*Modified April 15 to allow automakers to import vehicles assembled in the United States duty-free provided that they continued to build cars in Canada and continued with previously announced expansions.</i>	April 9, 2025
IEEPA Fentanyl Tariffs	China	10% tariffs on crude oil, cars, trucks, and agricultural machinery; 15% on coal and LNG; export controls on certain metal products and related technologies; anti-monopoly investigation into Google; and initiation of a WTO dispute.	February 10, 2025
IEEPA Fentanyl Tariffs	China	15% on U.S. chicken, wheat, corn, and cotton; 10% on U.S. soybeans, sorghum, pork, beef, seafood, fruit, vegetables, and dairy products; addition of 15 U.S. companies to China Export Control List and 10 U.S. companies to Unreliable Entities List.	March 10, 2025
IEEPA Reciprocal	China	Retaliatory tariffs on <u>all</u> U.S. products at the following rates: <ul style="list-style-type: none"> <li>- 84%</li> <li>- 125%</li> <li>- 10%</li> </ul> Addition of 11 companies to Unreliable Entities List; anti-monopoly investigation of DuPont in China; two trade investigations on U.S. exports of medical imaging equipment; suspension of certain U.S. chicken and sorghum imports.	April 10, 2025 April 12, 2025 May 14, 2025  <i>Agreed to remove effective May 14, 2025</i>

Section 232 Steel and Aluminum Tariffs	European Union	<p>Proposed EU countermeasures cover €21 billion of US exports; countermeasures include:</p> <p>Allowing the suspension of existing 2018 and 2020 countermeasures against the US to lapse; and implementing a new package of counter-measures on US exports.</p>	April 14, 2025; immediately suspended until July 14, 2025
IEEPA Reciprocal and Section 232 Auto / Parts Tariffs	European Union	<p>On May 7, the European Commission launched a public consultation on a list of U.S. imports which could become subject to EU countermeasures.</p> <p>The list includes imports from the US worth €95 billion, covering a broad range of industrial and agricultural products.</p> <p>The Commission is also consulting on possible restrictions on certain EU exports of steel scrap and chemical products to the US worth €4.4 billion.</p>	TBD