

TARIFF & TRADE WEBINAR | MARCH 2025

QUESTIONS & ANSWERS

1. Will Aircraft parts be affected by the new tariffs? We will have aircraft parts shipments from China to USA and from USA to Canada?

Unfortunately, aircraft parts imported under 19 CFR § 10.183 are not exempt from the additional tariff under IEEPA. If the aircraft parts do not qualify for duty-free provision under 19 CFR § 10.183, they are subject to the general rate of duty & the IEEPA tariff as applicable.

2. Is coffee allowed to be imported into USA from Canada until 4/2 and not be subject to Tariffs?

Yes, but only if the product falls under the current provisions of USMCA. Please reference GN.11 of the HTSUS, including section (n) Interpretation of Rules of Origin. It will be subject to the additional tariff if it does not fall under these provisions.

3. Does the 25% tariff will apply for brass faucets from China?

I assume this is in reference to Proclamations 10895 and 10896 from 10 Feb 2025, adjusting imports of steel and aluminum into the United States. If the HTS code for your brass faucets falls under these orders, then they would be subject to Section 232, so proper HTS classification is critical. Brass is, in general, an alloy of copper and zinc, but it would be good to confirm if it includes any steel or aluminum and if your HTS classification is correct.

4. Can we include a lump sum value of aluminum and steel content in the proforma invoice, instead of listing it for each product part?

We recommend declaring the aluminum and steel content in each line/item in your commercial invoice(s).

5. Does the 25% tariff will apply for Motorcycles ex China? Anything fixed with respect ex EU Tariffs and VAT differences linked to Country of Origin?

I assume this is in reference to Proclamations 10895 and 10896 from 10 Feb 2025, Adjusting imports of steel and aluminum into the United States. If the HTS code for your motorcycles is included in these orders, then they would be subject to Section 232, so proper HTS classification is critical.

As of right now, IEEPA tariffs are not levied against any member of the European Union.

6. When does Canada's reciprocal Tariffs kick-in?

This is a good question for your Customs broker in Canada. Based on what we can see, Canada levied reciprocal tariffs on US products effective 04 March 2025, but again, please confirm with your Canadian broker for specifics.

7. Will we see this on B-3 Entries as of shipments with a export date equal to or after 3/4, or does this kick in 4/2?

Please confirm the specifics with your Canadian Customs broker.

8. Will 9817 overwrite any of this?

As far as we are aware, the provisions of CH 9817 can still be used, however, this does not appear to exempt IEEPA or other punitive tariffs.

9. Any exemption imported China product that is used in the agricultural machinery industry?

As far as we are aware, the provisions of CH 9817 can still be used, however, this does not appear to exempt IEEPA or other punitive tariffs.

10. What does the IOR have to do to evaluate this USMCA/Certificate of origin from their vendors?

This is a great question. This answer will be specific to the provisions of General Note 11 of the HTS, which covers USMCA. Please work with your vendor(s) to ensure the imported products meet the regulations covered in this General Note. Just because the goods came from Mexico or Canada does not mean they are eligible for USMCA. If a supplier does complete a USCMA Certificate and/or Certificate of Origin, we recommend that importers evaluate how the supplier ultimately qualified for USMCA preference for due diligence purposes. Ideally, should CBP request information or documentation on imported shipments, you, as the IOR, are fully prepared to respond to any inquiries.

11. Is Vietnam affected by 232 this time?

Yes, this order is based on commodity and is not country specific.

12. Is Thailand affected?

Yes, the 232 order is based on commodity and is not country specific.

13. Are parts going in and out of Singapore affected?

Yes, the 232 order is based on commodity and is not country specific.

14. These tariffs all combine on each other, correct?

Unfortunately, they are all stacking.

15. Does Section 232 apply to steel or aluminum imported from any country, correct?

Correct. The only exemption is steel, and aluminum melted and poured from the United States

16. Do 232 tariffs on section 73 steel derivative products apply to the full value of the product, not only the steel value?

Unfortunately, they will apply to the product's full value should the commodity fall under Chapter 73 of the HTS.

17. What countries do you expect new tariffs?

This is speculation based on the news cycle, not rooted in any executive orders or regulations, but there is a possibility of new tariffs levied on goods imported from the EU and other countries targeted for reciprocal tariffs.

18. Will any other free trade countries, beyond MX & CDN be impacted?

Relative to IEEPA - as of right now, no. However, this is subject to change with future actions.

19. Since steel content outside of chapter 73 does not yet have a tariff effective date, do we still need to provide the steel content value information in proforma?

We recommend that importers work on gathering information, ascertaining the steel content value of their products, and adding to their commercial documentation for when these commodities are subject to the additional tariff duty rate.

20. Can you cover de minimis changes? Does it remain at \$800 for China to the USA?

Yes, the value limit has not changed. Imports that qualify for de minimis entry from Canada, Mexico, and China are temporarily exempt from the new tariffs.

21. Will battery products out of Korea be affected?

I assume this is in reference to Proclamations 10895 and 10896 from 10 Feb 2025, adjusting steel and aluminum imports into the United States. If the HTS code for your battery products is included in these orders, they would be subject to Section 232, so proper HTS classification is critical.

22. Are parts made from Steel that are imported into the US from Brazil, India and Italy all subject to the 25% tariff that's targeted for March 12?

If the HTS code is included in the Section 232 orders, they would be subject to Section 232, so proper HTS classification is critical. Right now, these are global, not country-specific.

23. Are steel parts imported from China that are used in the agricultural market for harvesting exempt from tariffs?

As far as we are aware, the provisions of CH 9817 can still be used where available, however, this does not appear to exempt IEEPA or other punitive tariffs.