

Trade and Tariff Talk

ReMA Members Only Discussion

Tuesday, May 6, 2025

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Recycled Materials
Association

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Overview of Today's Trade and Tariff Talk

- Status of Tariffs and Retaliatory Measures
- Fees to Address Chinese Dominance in Shipbuilding, Maritime and Logistics Sectors
- Section 232 Investigations
- Other Policies that Would Impact Trade
- What's Next?



New Tariff Requirements for 2025

Send questions to:
traderemedy@cbp.dhs.gov
Updated May 2, 2025
CBP Publication No. 5008-0425



China/Hong Kong

TARIFF RATE:
20%

EFFECTIVE DATE:
February 4

Pursuant to IEEPA, additional 10% tariff on all goods. Amended March 4th to increase to additional 20% tariff. Exclusions apply. De Minimis no longer available effective May 2nd.



Autos, Auto Parts

TARIFF RATE:
25%

EFFECTIVE DATE:
April 3, May 3

Pursuant to Section 232, additional 25% on passenger vehicles and light trucks (effective April 3rd) and auto parts (effective May 3rd) of all countries.



Mexico

TARIFF RATE:
25%, 10% potash

EFFECTIVE DATE:
March 4

Pursuant to IEEPA, additional 25% on all goods. Amended March 7th to 10% on potash and exemptions for USMCA-originating goods. Exclusions apply.



Canada

TARIFF RATE:
25%, 10% energy & potash

EFFECTIVE DATE:
March 4, March 7

Pursuant to IEEPA, additional 25% on all goods other than 10% on energy. Amended March 7th to 10% on potash and exemptions for USMCA-originating goods. Exclusions apply.



Steel

TARIFF RATE:
25%

EFFECTIVE DATE:
March 12

Pursuant to Section 232, additional 25% on imports of steel (including derivatives) of all countries.



Aluminum

TARIFF RATE:
25%

EFFECTIVE DATE:
March 12

Pursuant to Section 232, additional 25% on imports of aluminum (including derivatives) of all countries, except aluminum of Russia which is subject to 200%.



Reciprocal

TARIFF RATE:
10% - 125%

EFFECTIVE DATE:
April 5, April 9, April 10

Pursuant to IEEPA, additional 10% on imports from all countries; 125% for goods of China, Hong Kong and Macau. Exceptions apply. Additional country specific rates suspended until July 9th.

New Tariff Programs

- Emergency Border Tariffs – China
- Emergency Border Tariffs – Canada and Mexico
- 232 Tariffs on Autos and Auto Parts – all countries
- Reciprocal Tariffs – all countries

Modify Existing Tariff Programs

- Section 232 Tariffs on Steel – all countries
- Section 232 Tariffs on Aluminum – all countries

Reciprocal Tariff Action

- **Universal Baseline** – across-the-board 10 percent duty
 - Imposed on April 5th on all countries, except for Canada and Mexico
 - Likely to remain in place for all countries – unlikely up for negotiation
- **Reciprocal Tariffs** – duty on top of 10 percent baseline
 - Currently **on pause for 90 days**, but will impact approximately 75 countries
 - Negotiations with foreign governments mostly focused on these tariffs.
- Nearly every product from every country is now subject to 10 percent tariff, unless specifically carved out.

Exclusions from Reciprocal Tariffs

Six specific types of exclusions from the reciprocal tariffs:

1. Articles subject to 50 USC 1702(b);
2. Steel/aluminum articles and auto/auto parts already subject to Section 232 tariffs;
3. Copper, pharmaceutical, semiconductors and lumber articles;
4. All articles that may become subject to future 232 action;
5. Bullion; and
6. Energy and other certain minerals not available in the U.S.

Exclusions from Reciprocal/Universal Tariffs

Recycled Materials Excluded

- Stainless steel (7204.21.00)
- Copper (7404.00.30 and 7404.00.60)
- Zinc (7902.00.00)
- Tin (8002.00.00)
- Tungsten (8101.97.00)
- Magnesium (8104.20.00)
- Cobalt (8105.30.00)
- Titanium (8108.30.00)
- Chromium (8112.22.00)

Recycled Materials Not Excluded

- Plastics (3915)
- Tires (4004)
- Paper/Paperboard (4707)
- Ferrous (7204) except for stainless
- Aluminum (7602)
- Electronics and Batteries (8549)

Reciprocal Tariff Negotiations

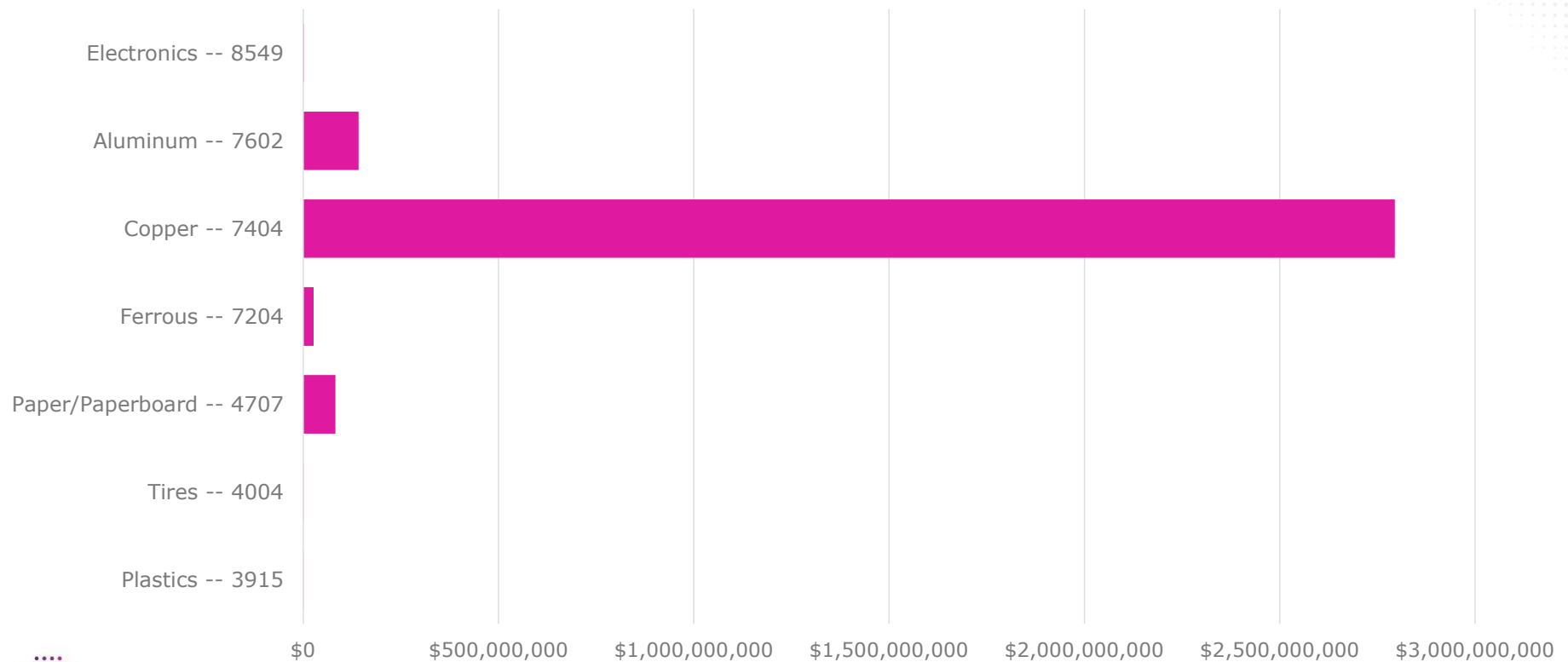
- President Trump announced 90-day pause in the full implementation of the higher reciprocal tariffs on the EU and about 50 other countries, which expires **July 9**.
- White House only seeking to negotiate the higher reciprocal duties, above 10 percent universal baseline.
- What exactly is the White House looking to negotiate on?
 - Tariffs on U.S. exports
 - Non-tariff measures, like licensing requirements, permits, other standards
 - Unfair trade (and non-trade) policies, like VAT

Negotiations with China

- President Trump imposed tariffs on Chinese imports, beginning in 2018, which led to a **Phase One Agreement** in January 2020:
 - Committed China to increase purchases of U.S. goods/services by \$200 billion over two year period (2020-21)
 - China failed to reach that goal of purchasing increased U.S. exports
- China is the only country to retaliate against U.S. exports as a result of the reciprocal tariff action, so how these negotiations are handled will likely impact concessions other countries will make to U.S.

U.S. Exports of Recycled Materials to China

Value of U.S. Exports (2024 in USD)



Section 232 Investigation into Copper Imports

- Commerce launched Section 232 national security investigation into copper imports in early March and sought public feedback on products included and potential remedies.
 - Imports of recycled copper included in scope of inquiry.
 - Export control restrictions, in addition to tariffs, a potential outcome of investigation.
- BIS has 270 days to complete investigation and earliest expectation of finalization likely in October.
- ReMA engaged with BIS and Commerce, seeking to avoid export restrictions as potential remedy.

Section 232 Product Inclusions Process

- Commerce Department has initiated a new process to **expand the products** covered by the Section 232 steel and aluminum derivatives tariffs.
 - Interim final rule (IFR) lays out a set of procedures that must be followed, including public review process to determine eligibility.
- Inclusions process will allow interested parties to request that certain downstream/derivative steel or aluminum products be subject to the 25 percent Section 232 duty.
- Working with Counsel to monitor the process and requests.

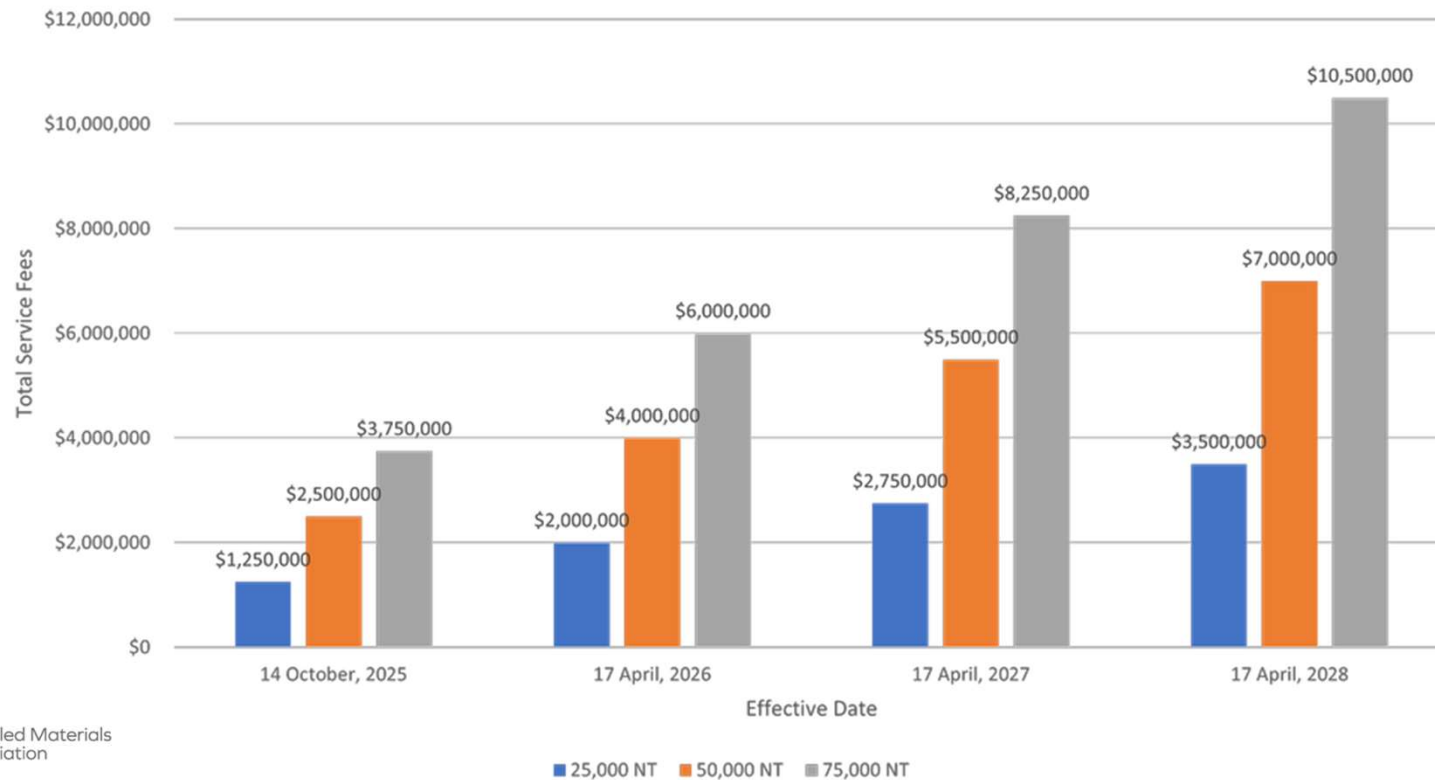
Action Against Chinese-Operated and Chinese-Produced Vessels

- On April 17, USTR announced scaled-back version of fee structure for Chinese-operated and Chinese-produced vessels. New fees will be based on net tonnage (NT) of vessels and will include annual cap of five (5) assessments per vessel.
- Certain exemptions for Chinese vessels arriving empty in U.S. ports, vessels making short trips, and other smaller vessels.
- Removed most aggressive proposals, such as fee each port visit and fee on shipping companies that operate Chinese vessels, but do not use those vessels to transit U.S. ports.

Estimated Impact of Fees – Chinese Shipping Companies

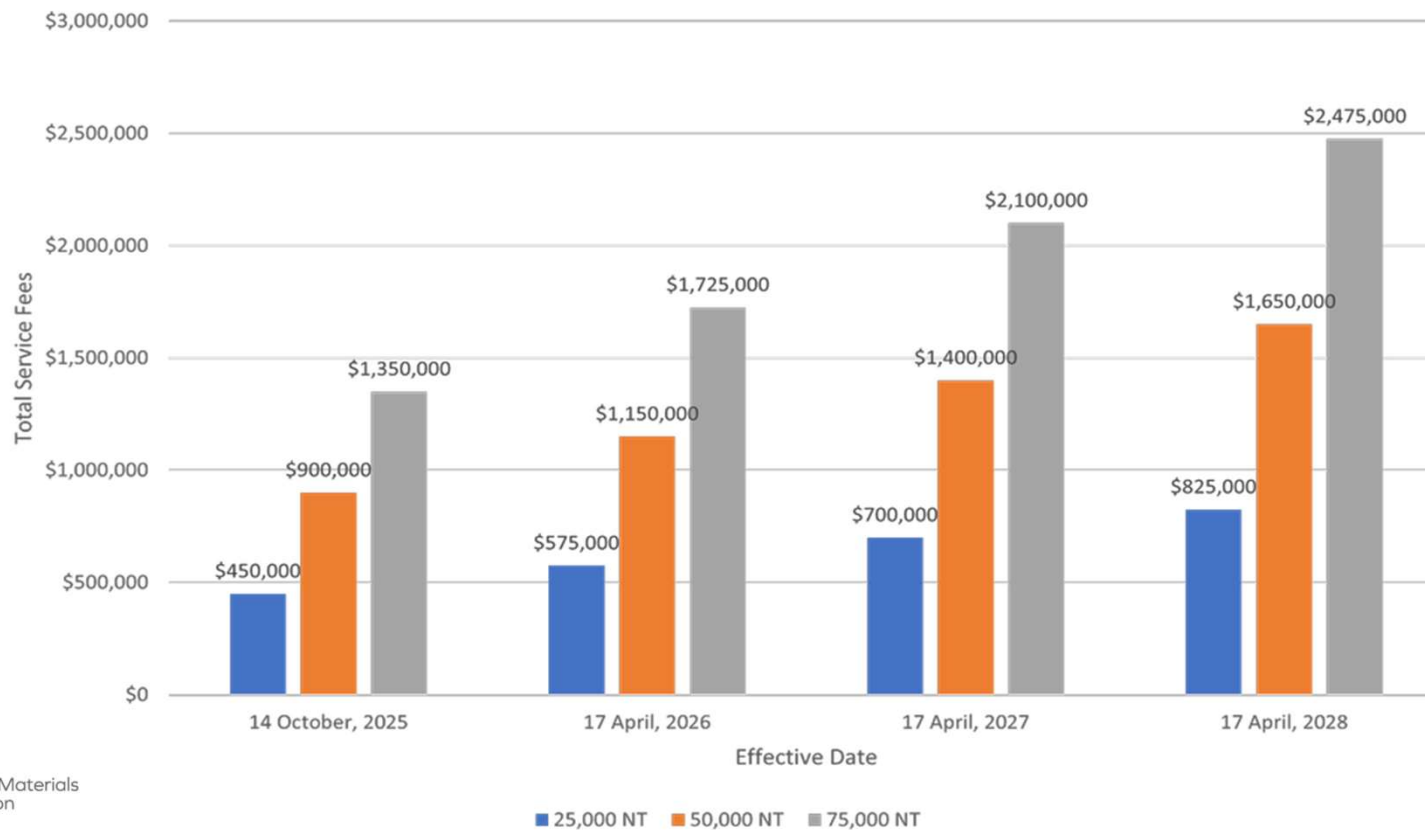
WSC Estimated Impact Summary – selected net tonnage (per voyage)

Annex I: Total Service Fees on Chinese Vessel Operators & Vessel Owners of China



Estimated Impact of Fees – Chinese-Built Vessels

WSC Estimated Impact Summary – selected net tonnage (per voyage)
Annex II: Total Service Fees on Vessel Operators of Chinese-Built Vessels



ReMA Advocacy and Lobbying Efforts

- Market access continues to be the top priority for advocacy efforts with the Trump Administration and Congress.
 - Engagement with transition and New Administration officials on market access
 - Capitol Hill meetings and February fly-in
- Hired trade counsel to navigate specific trade-related challenges, such as export control measures and other trade-restrictive policies.
 - Prepared detailed submission to Commerce on Section 232 investigation into copper imports, advocating against export restrictions.
 - Engaging with BIS, OMB and other Administration officials, both formally and informally.
 - Monitoring other engagements with intent of reducing trade in recycled materials.

Court and Congressional Actions

- Congressional action, including resolutions of disapproval and legislation, primarily stalled, particularly as the higher reciprocal tariffs on selected trading partners on pause through July.
- Reciprocal tariff actions (under IEEPA) challenged in several Federal Court cases, as statute has never been used to impose tariffs. However, tariffs under Section 232 much likelier to be upheld by Courts.
- Most likely recourse will be impact of tariffs on the markets, public opinion and the broad economy/employment levels.

ReMA Convention Trade Panels

Tuesday, May 13, 2025

The Global Future: India | Sponsored by: Jain Resource Recycling

🕒 2:00 PM–3:15 PM PDT Meeting Room 30 - Upper Level



Mohan Agarwal



Josephita Harry



Ved Prakash Lata



Amar Singh

Navigating North American Trade & Beyond: The Future of Recycled Materials with Tariffs and a Shifting Political Landscape

🕒 3:30 PM–4:45 PM PDT Ballroom 20 B-D - Upper Level



Christopher Bedell



Nazak Nikakhar

Wednesday, May 14, 2025

Trade and Tariff Talk: How Will U.S.-China Trading Relationship Impact Global Recyclers?

🕒 12:00 PM–1:15 PM PDT Meeting Room 30 - Upper Level



Adam Shaffer



Member Resources

www.recycledmaterials.org/trade

ReMA Trade and Tariff Information

Note for Members: the information and analysis provided by ReMA staff is only intended for use by ReMA members. It is also a document that will be updated and modified as new developments occur and evolve, as well as further discussions take place among ReMA members.

General Trade and Tariffs

- What are the different tariff actions that the President has implemented so far? ✓
- What is the timeline for imposition of these new tariffs? ✓
- What role does Congress and the Courts play? ✓
- What Other Trade and Tariff Actions Has the New Administration Taken Since January 20? ✓

Emergency Border Tariff Measures

- What is the expected impact of the Emergency Border Tariff Measures on imports from Canada, Mexico and China, on the recycled materials industry? ✓
- What About Retaliation? ✓
- What Products Have Been Exempted or Carved Out? ✓

Webinars

Trade, Tariffs, and Trump 2.0: Where Do We Stand Today? ^



Download Presentation Slides

Join us for the latest *Trade and Tariff Talk*, a ReMA 2025 webinar series.

Register Now



External Resources

U.S. Customs and Border Protection (CBP) [Guidance/FAQ](#) on Section 232 Tariffs on Steel and Aluminum Imports

[Proposed List of Canadian Retaliatory Tariff Measures](#) (includes significant tariff lines for recycled/recyclable material exports from the U.S.)

[Scope of the Section 232 Steel Tariffs, including Derivative Products](#)

[Scope of the Section 232 Aluminum Tariffs, including Derivative Products](#)

Have Questions?

ReMA is providing updates for members as new information becomes available. Please email

tariffquestions@recycledmaterials.org with any additional questions.

Member Alerts and Communications

Member Alert



Section 232 Tariffs on Steel and Aluminum Imports Will Continue to Exclude Recycled Steel and Recycled Aluminum

- The Trump Administration today published on February 10 that fully re-excludes recycled steel and aluminum from all countries.
- With the public release of the annex **recycled aluminum products remain**. These materials had been excluded from the tariffs first imposed in 2018 and will continue to be excluded from the tariffs.
- The Proclamations end the various free trade agreements, quotas or tariff-rate quotas (TRQs).

Member Alert



President Trump Imposes Tariffs on Imports from Canada and China, Beginning February 4, 2025; 30-day Delay on Imports from Mexico

- On February 1, 2025, President Trump signed three Executive Orders imposing 25 percent tariffs on imports from China and Mexico. The duty exception of 25 percent for recycled materials from China will apply to imports from warehouse inventory 4, 2025. These were pre-loaded on February 1, 2025.

Member Alert



March 7, 2025

Import Tariffs Delayed for Goods Entering the U.S. Using USMCA Preference

- The White House yesterday announced a one-month pause for the emergency border tariffs on goods imported from Canada and Mexico that comply with the United States-Mexico-Canada Agreement (USMCA).
- This exemption, through April 2, applies to goods imported that both **qualify and claim** status of origin under USMCA. It does not apply to goods imported using most-favored nation (MFN) duty-free rates.
- It is our understanding that recycled material imports into the U.S. qualify for origin in the USMCA origin if they are collected (either pre-consumer or post-consumer) in North America. USMCA requires a **Certificate of Origin** to be filed and U.S. Customs and Border Protection (CBP) has **guidance** on the data elements that are necessary to qualify for USMCA duty-free treatment.

ReMA Trade & Tariff Update



March 25, 2025

Next Steps in Trump Administration Trade and Tariff Announcements

- Next week, the White House is expected to begin announcing the next round of trade and tariff actions, as it seeks to implement President Trump's [America First Trade Policy](#).
- These announcements are expected to take place starting on Wednesday, April 2, following reviews by federal trade agencies of all U.S. trade and tariff policies. It is expected that these agencies will also provide policy recommendations to the White House, though it is unclear whether these reports and recommendations will be released publicly.
- It is expected that the White House will issue further guidance on the application of the Emergency Border Tariffs (IEEPA) for imports from Canada, Mexico and China, and how those tariffs will interact with any new tariffs the White House intends to announce.

Thank You

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