

Trade and Tariff Talk

ReMA Members Only Discussion

Thursday, April 10, 2025

Adam Shaffer

VP, International Trade and Global Affairs



Recycled Materials
Association

Sustainable. Resilient. Essential.

recycledmaterials.org

State of Play on Tariffs

What is Currently On Pause

- Reciprocal tariffs on approx. 75 countries for 90 days to allow for negotiations.

What is Currently Not on Pause

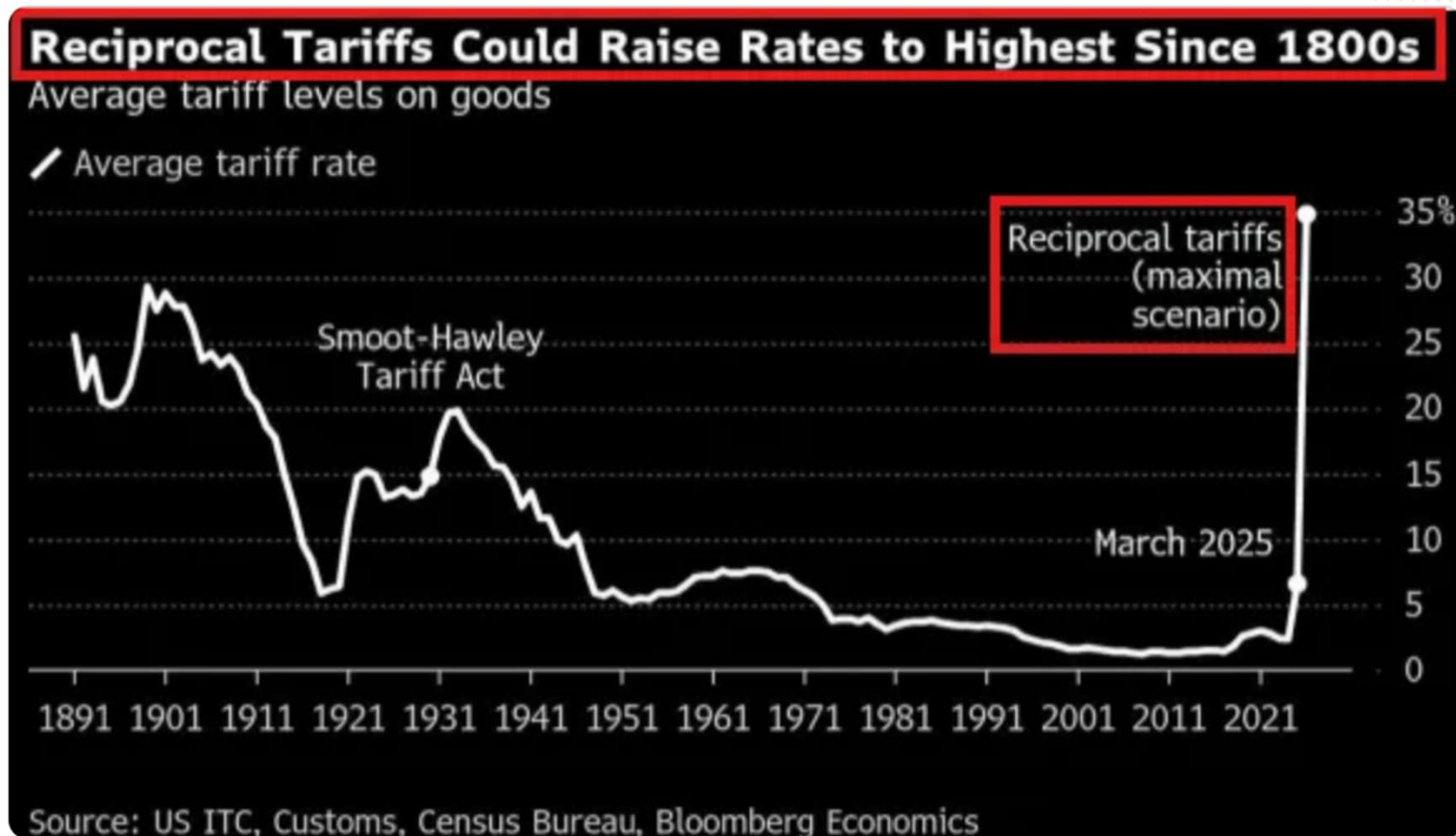
- Universal 10 percent tariff on almost all imports from most countries.
- Emergency border tariffs on Canada, Mexico and China.
- Reciprocal tariffs on imports from China.
- Section 232 tariffs on steel, aluminum, autos and auto parts.

Duty-Free Access to U.S. Market

Coverage of U.S. Import Tariffs on Recycled and Recyclable Materials

	Emergency Border Tariffs	Emergency Border Tariffs	232 Steel + Aluminum	Universal Tariffs	Reciprocal Tariffs	Reciprocal Tariffs
	Canada & Mexico	China	All Countries	All Countries	Select 70+ Countries	China
Steel	?	×	✓	×	On Pause until July 9, 2025	×
Aluminum	?	×	✓	×		×
Copper	?	×	✓	✓		✓
Other Metals	?	×	✓	?		?
Paper and Paperboard	?	×	✓	×		×
Plastics	?	×	✓	×		×
Electronics	?	×	✓	×		×
Tires	?	×	✓	×		×

Average U.S. Import Tariff Rate on Goods



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
 - Most products, including certain recycled materials, such as recycled steel and recycled aluminum, but excludes goods subject to other tariffs or energy/critical mineral products not available in the U.S.
 - Negotiations with foreign governments mostly focused on these tariffs.

In-Transit Exceptions to Universal Tariff

- In order to qualify for an in-transit exception from universal baseline tariffs, goods must have been:
 - Loaded onto a vessel at port of loading and in transit on the final mode of transport before 12:01am EDT on April 5, 2025,
 - AND**
 - Entered for consumption into the U.S. before 12:01am EDT on May 27, 2025.

Reciprocal Duty Rates on Top U.S. Suppliers

U.S. Imports of Recycled Materials		Reciprocal Duty Rates
1	Canada	*12%*
2	Mexico	*12%*
3	United Kingdom	10%
4	Germany (EU-27)	20%
5	Japan	24%
6	China	34%
7	Netherlands (EU-27)	20%
8	Sweden (EU-27)	20%
9	France (EU-27)	20%
10	Italy (EU-27)	20%
11	Honduras	10%
12	South Korea	25%
13	Singapore	10%
14	Ecuador	10%
15	Panama	10%

Currently
10%
Universal

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.

Annex II – Relevant Exclusions

HTS Code	Description
4401.31.00	Sawdust and wood waste and scrap, pellets
4401.39.42	Sawdust and wood waste and scrap, agglomerated, excluding wood pellets, wood briquettes and artificial fire logs
4401.49.00	Other wood waste and scrap, not agglomerated, other than sawdust
7112.92.01	Platinum waste and scrap, incl. metal clad w/ platinum, excluding sweepings containing other precious metals, other than goods of e-waste heading 8549
7204.21.00	Stainless steel waste and scrap
7404.00.30	Copper spent anodes; copper waste & scrap containing less than 94% by weight of copper
7404.00.60	Copper, waste and scrap containing 94% or more by weight of copper
7902.00.00	Zinc, waste and scrap
8002.00.00	Tin, waste and scrap
8101.97.00	Tungsten waste and scrap
8104.20.00	Magnesium, waste and scrap
8105.30.00	Cobalt waste and scrap
8108.30.00	Titanium waste and scrap
8110.20.00	Antimony waste and scrap
8112.22.00	Chromium waste and scrap
8112.41.10	Rhenium, waste and scrap

Emergency Border Tariffs (IEEPA)

- Several questions related to auditing by CBP on USMCA-compliant goods from Canada and Mexico.
- USMCA preference may be claimed on unconditionally free tariff items, but how will CBP verify that these materials were collected, either pre- or post-consumer in the USMCA region?

General Note 11 United States-Mexico-Canada Agreement

DOWNLOAD 

(iv) Good wholly obtained or produced entirely in the territory of one or more USMCA countries.—The term “good wholly obtained or produced entirely in the territory of one or more USMCA countries” means any of the following:

(10) waste and scrap derived from—

(A) production in the territory of one or more USMCA countries; or

(B) used goods collected in the territory of one or more USMCA countries, if such goods are fit only for the recovery of raw materials;

Chinese Retaliation on Reciprocal Tariffs

April 2nd – President Trump imposes **34 percent** reciprocal tariff on all Chinese imports. Stacks on top of existing **20 percent** tariffs.

April 4th – China announces retaliatory tariff of **34 percent** on all U.S. exports and imposes export ban on certain rare earth minerals.

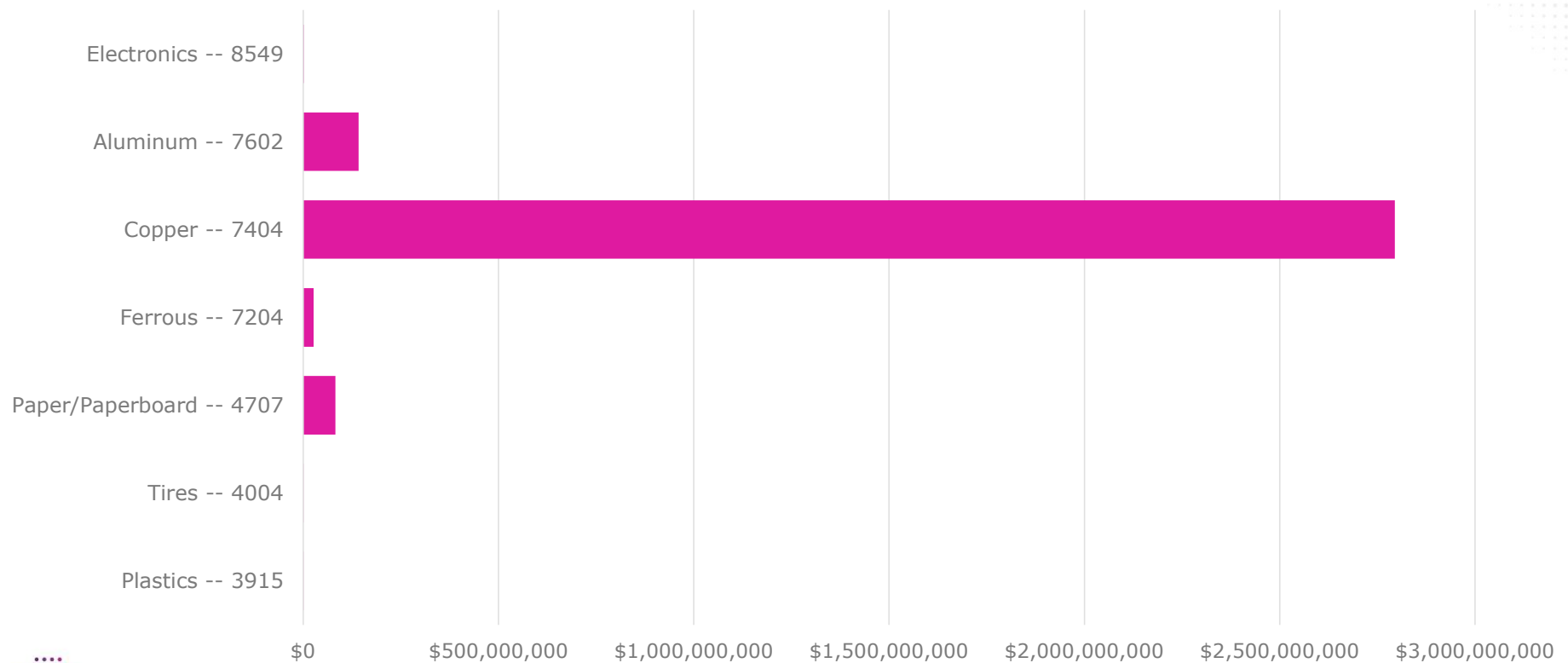
April 7th – President Trump announces further escalation, increasing effective rate on Chinese imports to **104 percent** (which is 84 percent + 20 percent).

April 9th – China increases retaliation on all U.S. exports to **84 percent**.

April 9th – President Trump increases reciprocal tariff rate on Chinese imports to **125 percent**, for total burden of **145 percent**.

U.S. Exports of Recycled Materials to China

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



Other Retaliatory Tariff Measures

- Emergency border tariffs – on Canada, Mexico and China
 - China targeted retaliation against initial 10-20 percent tariffs, including export controls on certain critical minerals.
 - Canada slaps import tariffs on \$30B CAD initially, released \$125B CAD proposed list, but has not moved forward yet on that retaliation.
- Steel and aluminum – on all countries
 - Canada imposes \$30B CAD on U.S. exports of steel/aluminum products
 - EU announced, then suspended, €21B retaliation against U.S. exports of some ag, manufactured goods, steel, aluminum and other politically-sensitive goods.
 - Does not include U.S. recycled material exports.

Proposed Action on China Shipbuilding

- Significant fees outlined in the proposed action, including:
 - \$1 million fee per U.S. port call on Chinese vessel operators;
 - \$1.5 million fee per U.S. port call for Chinese-built vessels; and
 - Additional service fee instituted on each U.S. port call by vessel operators, regardless of nationality/vessel flag, if those operators have vessels on order from Chinese shipyards.
- Seven-year phase-in of commercial cargo preference:
 - Beginning first year, 1 percent of U.S. exports required to be carried by U.S.-flagged vessels, increasing to 15 percent by year seven
- Align with comments by President Trump to spur U.S. shipbuilding and support competitiveness of the U.S. maritime industry.



BUSINESS | LOGISTICS

Trump Administration Revises Port-Fee Plan to Soften Blow to U.S. Exports

USTR to base fees largely on vessel capacity, ease charges on ships carrying agricultural exports like soybeans and timber

By *Costas Paris* [Follow](#)

April 9, 2025 8:18 am ET

The Trump administration is revising its plan to impose steep port fees on Chinese-built vessels to lessen the impact on U.S. exports, according to people familiar with the matter.

The Trump administration's new plan is to base the fees largely on vessel capacity, resulting in lower fees for smaller ships coming into ports such as Los Angeles, New York, Savannah, Ga., and Oakland, Calif., the people said. The U.S. Trade Representative's office is also looking to ease the charges on ships carrying agricultural exports such as soybeans and timber, the people said.

What's Next? What are the Off-Ramps?

- Senate voted to express disapproval of the emergency border tariffs on Canadian imports, with bipartisan vote of 51-48, seeking to end national emergency. But House is unlikely to take up the Resolution.
- Introduction of bipartisan legislation to reassert Congressional authority over tariff and trade measures.
- Tariffs have defenders in both political parties, so never a guarantee a new President would immediately reverse every tariff action.
- Court of public opinion and Wall Street.

Topics for Next Trade and Tariff Talk

- ~~• March 27th — Emergency Border Tariffs, Reciprocal Tariffs, Copper 232~~
- ~~• April 3rd — Announcements from April 2nd~~
- ~~• April 10th — Reciprocal Tariffs Pause, Next Steps in Port Fee Actions~~
- April 17th – **TBD**
- Thursdays Beyond – **As Necessary**

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 excluded**. 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% tariffs on imports from China and Mexico. The duty exemption of recycled materials from China and Mexico remains in effect. The government will review the impact of the 25% tariff on China and Mexico. China will apply the 25% tariff on imports from warehouse 1, February 4, 2025. These were pre-loaded on February 1, 2025.

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.

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.



Thank You

Adam Shaffer

VP, International Trade & Global Affairs

ashaffer@recycledmaterials.org

202-662-8532



Recycled Materials
Association

recycledmaterials.org