

Trade and Tariff Talk

ReMA Members Only Discussion

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Adam Shaffer

VP, International Trade and Global Affairs



Recycled Materials
Association

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Overview of Today's Trade and Tariff Talk

- Initial Thoughts and What We Know and What We Don't Know
- April 2nd Tariff Announcements
- Status of Emergency border tariffs (IEEPA) with Canada and Mexico
- Retaliatory Measures
- What's Next?
- Resources

Initial Thoughts on “Liberation Day”

What We Know

- New tariff measures a lot broader than originally assumed.
- Canada and Mexico seem to have averted significant further escalation – for now.
- These import tariffs will add significant compliance cost for importers and will be very challenging to enforce/implement by CBP.

What We Don't Know

- When governments negotiate on the tariffs, are they only negotiating on the reciprocal part (i.e., the delta)?
- Will foreign governments retaliate?

“Liberation Day” Tariff Announcements

(1) Universal Tariff – across-the-board 10 percent duty will apply to:

- All countries, except for Canada and Mexico
- Effective Saturday, April 5th

(2) Reciprocal Tariffs – rate above 10 percent varies by country

- Impact ~75 countries, including EU member states, **excludes** Canada and Mexico
- 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.
- Effective Wednesday, April 9th

Selected Reciprocal Duty Rates

| 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% |

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.

Potential Sectoral Tariffs

- The following products were excluded from the reciprocal tariff action, indicating likelihood of future sectoral tariff action:
 - Copper – *Section 232 investigation pending*
 - Semiconductors
 - Pharmaceuticals
 - Critical minerals
 - Certain agricultural products
 - Lumber
- Copper scrap excluded from the reciprocal tariff action, alongside other recycled/recyclable commodities.

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)

- White House left IEEPA tariffs on Canada and Mexico (and China) in place, including the exemption for **USMCA compliant** goods imported from Canada and Mexico that begin on March 7.
 - Imports must claim USMCA origination to qualify for exemption.
 - CBP estimates approx. 75 percent of Canadian and Mexican imports qualify.
- IEEPA tariffs remain instead of universal/reciprocal tariff measures.
- Should President Trump terminate these tariffs, USMCA compliant goods will continue to receive preferential treatment (zero duty), while goods from Canada and Mexico that are not originating, would be subject to 12 percent reciprocal tariff.

Implementing Instructions – USMCA Treatment



Implementing Instructions June 30, 2020

CBP Publication Number 1118-0620

Eligible Articles

Dutiable tariff items eligible for preferential tariff treatment under the USMCA will indicate the SPI “S” or “S+” in the “Special” subcolumn of the HTSUS. “S+” is designated for certain agricultural tariff rate quota (TRQs) goods, agricultural staging goods, and textile tariff preference level (TPL) goods. SPI “S+” is used only when the HTSUS provides different preferential tariff treatment to each of the USMCA countries.

USMCA preference may also be claimed on unconditionally free tariff items and is used to receive the exemption from Merchandise Processing Fees (MPF), although the SPI “S” will not be listed in the “Special” subcolumn in the HTSUS for those items.

Retaliatory Measures

- Chinese retaliated against emergency border measures and included export restrictions on certain critical minerals. Also intends to further escalate retaliation against more U.S. exported products.
- Canadian retaliated against limited lists of products for emergency border and steel/aluminum tariffs, but proposed second list of retaliation includes significant volumes of **U.S. exports of recycled materials**.
- European Union retaliated against imposition of steel and aluminum tariffs in mid-March and intends to retaliate against 20 percent reciprocal tariff, as well.

Auto Tariffs Announced Last Week

- Tariffs on auto/auto parts imports of 25 percent entered into force overnight on Thursday, April 3rd, covering imports from all countries.
- Increases overall U.S. duties on autos to **27.5 percent** (from 2.5 percent) and light trucks to **50 percent** (from 25 percent).
- USMCA-compliant **auto parts** will remain tariff-free until Secretary of Commerce, alongside CBP, establishes procedures for a process to **apply tariffs to non-U.S. content**.
- Directs the Secretary of Commerce to establish procedures for including additional auto parts in the scope of the tariffs in 90 days.

Tariffs Targeting Venezuelan Oil Exports

- President signed an EO that directs duties of 25 percent “secondary tariffs” on all trade with the U.S. for countries that purchase Venezuelan oil.
- Tariffs initially set to enter into effect on April 2, but the EO left implementation up to the Secretary of State.
- While primarily directed at China, no further information or details have been released by State Department about these new tariffs or which countries would be subject to the remedy.

Congressional Action on Trade

- Senate voted last night to express disapproval of the emergency border tariffs on Canadian imports, with bipartisan vote of 51-48, seeking to end national emergency.
- However, House is unlikely to take up the Resolution and it is veto-eligible, so 2/3 majority would be required to overturn veto.
- Introduction of bipartisan legislation to reassert Congressional authority over tariff and trade measures.
 - Very low likelihood that this legislation will move forward.

Topics for Next Trade and Tariff Talk

- ~~March 27th — Emergency Border Tariffs, Reciprocal Tariffs, Copper 232~~
- ~~April 3rd — Announcements from April 2nd~~
- April 10th – Canada/Mexico Trade, Automotive Content Requirements
- 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**. These materials had been excluded by 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 exemption of recycled materials from China and Mexico will remain in effect. The government will review the impact of the tariffs on February 1, 2025. China will apply to the government for a 30-day delay on 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



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