

Trade and Tariff Talk

ReMA Members Only Discussion

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Recycled Materials
Association

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Overview of Trade and Tariff Talk

- Timeline of Trade/Tariffs Year-to-Date
- Emergency border tariffs (IEEPA) on Canada, Mexico and China
- Reciprocal tariffs
- Section 232 investigation on copper imports
- What's Next?
- Resources

Timeline of Trade/Tariffs Year-to-Date

Jan. 20
President Trump Announces America First Trade Agenda

Feb. 3
Agrees to 30-day pause for tariffs on Canada and Mexico

Feb 10
Announces Plan to Fully Re-Impose Section 232 Steel and Aluminum Tariffs on all countries

Feb 25
Instructs DOC to evaluate national security effects of copper imports

Mar 6
Delays IEEPA tariffs on Canada and Mexican imports that meet USMCA origination

Apr 2
Next Steps Expected

Feb. 1
Launches IEEPA tariffs on Canada, Mexico and China

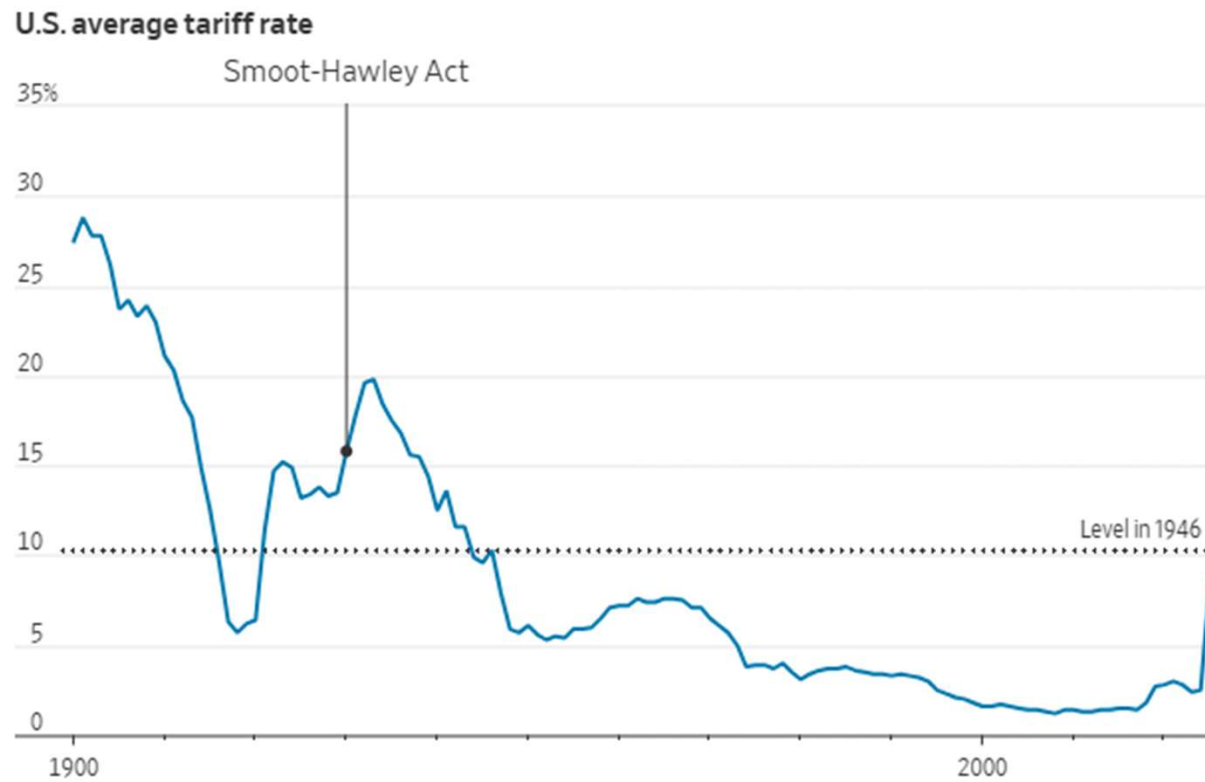
Feb. 4
10% IEEPA Tariff Imposed on Chinese Imports

Feb 13
Issues plan for "reciprocal tariffs"

Mar 4
25% tariffs on Canada and Mexico go into effect, increases duty rate to 20% for China

Mar 12
Fully restores steel and aluminum tariffs

Highest Average Tariff Rate Since 1946



Auto Tariffs Announced Yesterday

- President Trump announced yesterday he will impose 25 percent tariffs on autos and auto part imports from all countries and goes into effect on Thursday, April 3rd at midnight.
- Increases overall U.S. duties on autos to **27.5 percent** (from 2.5 percent) and light trucks to **50 percent** (from 25 percent).
- White House is using authority from his first term that found auto/auto parts imports threatened to impair U.S. national security, but never acted upon this finding.
 - Likely will be challenged in the Courts, because Section 232 has time limitations for when actions must be taken as part of investigation.

Auto Tariffs Announced Yesterday

- Key provisions of Presidential Proclamation include:
 - 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 within 90 days; and
 - Includes limitations on the treatment of goods admitted to foreign trade zones (FTZs) and prohibits claims for duty drawback.

Emergency Border Tariffs (IEEPA)

- President Trump imposed emergency tariffs to address border issues.
 - 10% tariff on all Chinese imports went into effect **February 4** and doubled on **March 4**. This tariff “stacks” onto other China tariffs, such as Section 301.
 - 25% tariff on all Canadian and Mexican imports initially paused for one month, but went into effect on **March 4**. Additional one-month delay for USMCA-compliant goods.
 - Lower 10% tariff on select Canadian energy and critical mineral imports.
- China and Canada have both announced retaliatory measures.
 - Chinese retaliation includes export restrictions on certain critical minerals.
 - Canadian retaliation includes 3-week consult period on second list of retaliation, which lists significant volumes of **U.S. exports of recycled materials**.

Emergency Border Tariffs (IEEPA)

- Current exemption for **USMCA compliant** imports from Canada and Mexico began March 7.
- Imports must **claim USMCA origination** to qualify for exemption. Importers typically can claim one of two types of treatment:
 1. Most-favored nation (MFN) duty, which applies to all countries, for recycled materials is generally 0 percent duty.
 2. USMCA origination, applies only to recycled materials collected (pre- or post-consumer) within North America and requires Certification of Origin.
- For imports from March 4-6, CBP will not be refunding duties paid.

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.

Proposed Canadian Retaliatory Tariffs

7204.10.00	Ferrous waste and scrap; remelting scrap ingots of iron or steel.	<ul style="list-style-type: none">• Waste and scrap of cast iron
7204.21.00	Ferrous waste and scrap; remelting scrap ingots of iron or steel.	<ul style="list-style-type: none">• Waste and scrap of alloy steel: Of stainless steel
7204.29.00	Ferrous waste and scrap; remelting scrap ingots of iron or steel.	<ul style="list-style-type: none">• Waste and scrap of alloy steel: Other
7204.30.00	Ferrous waste and scrap; remelting scrap ingots of iron or steel.	<ul style="list-style-type: none">• Waste and scrap of tinned iron or steel
7204.41.00	Ferrous waste and scrap; remelting scrap ingots of iron or steel.	<ul style="list-style-type: none">• Other waste and scrap: Turnings, shavings, chips, milling waste, sawdust, filings, trimmings and stampings, whether or not in bundles
7204.49.00	Ferrous waste and scrap; remelting scrap ingots of iron or steel.	<ul style="list-style-type: none">• Other waste and scrap: Other

Proposed Canadian Retaliatory Tariffs

4707.10.00	Recovered (waste and scrap) paper or paperboard.	<ul style="list-style-type: none"> • Unbleached kraft paper or paperboard or corrugated paper or paperboard
4707.20.00	Recovered (waste and scrap) paper or paperboard.	<ul style="list-style-type: none"> • Other paper or paperboard made mainly of bleached chemical pulp, not coloured in the mass
4707.30.00	Recovered (waste and scrap) paper or paperboard.	<ul style="list-style-type: none"> • Paper or paperboard made mainly of mechanical pulp (for example, newspapers, journals and similar printed matter)
4707.90.00	Recovered (waste and scrap) paper or paperboard.	<ul style="list-style-type: none"> • Other, including unsorted waste and scrap
7404.00.10	Copper waste and scrap.	<ul style="list-style-type: none"> • Spent anodes, not alloyed; With a copper content of less than 94% by weight, not alloyed
7404.00.20	Copper waste and scrap.	<ul style="list-style-type: none"> • Copper-zinc base alloys (brass) with a copper content of less than 94% by weight
7404.00.91	Copper waste and scrap.	<ul style="list-style-type: none"> • Other: With a copper content of less than 94% by weight
7404.00.99	Copper waste and scrap.	<ul style="list-style-type: none"> • Other: Other

Proposed Canadian Retaliatory Tariffs

3915.10.00	Waste, parings and scrap, of plastics.	• Of polymers of ethylene
3915.20.00	Waste, parings and scrap, of plastics.	• Of polymers of styrene
3915.30.00	Waste, parings and scrap, of plastics.	• Of polymers of vinyl chloride
3915.90.00	Waste, parings and scrap, of plastics.	• Of other plastics
7602.00.00	Aluminum waste and scrap.	

Proposed Canadian Retaliatory Tariffs

8549.11.00	Electrical and electronic waste and scrap.	<ul style="list-style-type: none">Waste and scrap of primary cells, primary batteries and electric accumulators; spent primary cells, spent primary batteries and spent electric accumulators: Waste and scrap of lead-acid accumulators; spent lead-acid accumulators: Waste and scrap of lead-acid accumulators; spent lead-acid accumulators
8549.12.00	Electrical and electronic waste and scrap.	<ul style="list-style-type: none">Waste and scrap of primary cells, primary batteries and electric accumulators; spent primary cells, spent primary batteries and spent electric accumulators: Other, containing lead, cadmium or mercury: Other, containing lead, cadmium or mercury
8549.13.00	Electrical and electronic waste and scrap.	<ul style="list-style-type: none">Waste and scrap of primary cells, primary batteries and electric accumulators; spent primary cells, spent primary batteries and spent electric accumulators: Sorted by chemical type and not containing lead, cadmium or mercury: Sorted by chemical type and not containing lead, cadmium or mercury
8549.14.00	Electrical and electronic waste and scrap.	<ul style="list-style-type: none">Waste and scrap of primary cells, primary batteries and electric accumulators; spent primary cells, spent primary batteries and spent electric accumulators: Unsorted and not containing lead, cadmium or mercury: Unsorted and not containing lead, cadmium or mercury
8549.19.00	Electrical and electronic waste and scrap.	<ul style="list-style-type: none">Waste and scrap of primary cells, primary batteries and electric accumulators; spent primary cells, spent primary batteries and spent electric accumulators: Other: Other

Expectations for Reciprocal Tariffs

POLITICO PRO



Gift article



EU expects Trump to set flat, double-digit tariff on April 2

Countries in the European Union are likely to face a flat, double-digit tariff on all goods as part of the “reciprocal” tariffs President Donald Trump has promised to unveil on April 2.

The final tariff rate is still fluid, according to three diplomats, who were briefed on European trade chief Maroš Šefčovič’s Tuesday meeting with Commerce Secretary Howard Lutnick and U.S. Trade Representative Jamieson Greer, and were granted anonymity to share details of the private briefing. The tariffs are expected to kick in at midnight on April 3, the people were told.

Reciprocal Tariff Actions

- White House expected to provide significant clarity on broad-scale tariffs and trade policies during announcements expected on Wednesday, April 2nd.
- Reciprocal tariffs had initially been viewed as leveling the playing field by imposing identical tariff rates for imports from trading partners – a “one-for-one tariff” where duties match that country’s import tariff on the same product.
- President often cites the EU import tax for autos (10 percent) compared to U.S. import duty (2.5 percent) as being unfair.

Reciprocal Tariff Actions

- According to media reports, this process is narrowing in on the roughly 10-15 major trading partners that run trade deficits with the U.S.
 - Early estimates indicate up to 90 percent of U.S. imports could be subject to reciprocal tariffs.
- Process of administering a line-by-line HTSUS system for every U.S. trading partner would be extremely daunting.
- Evaluating more than just import duty rates – looking at other non-tariff measures, such as licensing requirements, trade restrictions, permitting, VAT, etc. – to arrive at a duty-level.

Section 232 Copper Investigation

- President Trump announced that Commerce Department will investigate national security implications of copper imports under Section 232.
 - While Commerce has 270 days to reports its findings back to the White House, the **comment period closes April 1st** and then the President will decide whether to take action.
 - Recycled copper **included in the scope** of this inquiry.
 - Export controls included as a potential recommendation if copper imports threaten U.S. national security, alongside tariffs and domestic-focused incentives.

Potential Sectoral Tariffs

- Key administration trade officials have discussed sectoral-specific tariff programs, including, but not limited to:
 - Semiconductors
 - Pharmaceuticals
 - Critical minerals
 - Agricultural products
 - Lumber
- Timeline remains unclear, with conflicting messaging about whether these would be announced (1) before April 2nd; (2) on April 2nd; or (3) after April 2nd.

Topics for Next Trade and Tariff Talk

- ~~March 27th – Emergency Border Tariffs, Reciprocal Tariffs, Copper 232~~
- April 3rd – Announcements from April 2nd, likely reciprocal tariffs
- April 10th – **TBD**
- 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 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.

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

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