TORRES TRADE LAW
INTERNATIONAL TRADE & NATIONAL SECURITY

Torres Trade Trump Table

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Summary:

The table below presents a structured timeline of executive actions, policy directives, and trade-related decisions issued by President Trump's administration from January 2025 to the present. It focuses on critical areas such as tariffs, economic sanctions (OFAC), the priorities of the Department of Justice, customs regulations, and broader trade and economic policies.

The table captures significant policy shifts, including the imposition and threats of tariffs on imports from Canada, Mexico, China, and other countries; sanctions targeting individuals, international organizations, and foreign entities; and efforts to align federal agencies with an "America First" economic and diplomatic agenda. As a whole, the actions summarized below illustrate the administration's approach to trade protectionism, economic nationalism, and regulatory intervention, which has far-reaching implications for global trade relationships, U.S. businesses, and international law enforcement efforts.

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TRACKER

Date	Source	Category	Summary
11/10/26	U.S. Trade Representative Notice Notice of Modification of Section 301 Action: China's Targeting of the Maritime, Logistics, and Shipbuilding Sectors for Dominance	Tariffs	The USTR has extended the suspension of Section 301 trade measures targeting China's maritime, logistics, and shipbuilding sectors for an additional two months, through January 9, 2027. The measures were originally announced in April 2025, and include fees on certain maritime transportation services and additional tariffs on Chinese-origin ship-to-shore cranes and other cargo-handling equipment. The USTR initially suspended these measures for one year beginning November 10, 2025, following a trade agreement between the United States and China. This latest extension is effective November 9, 2026, and ensures that affected parties will not accrue liability for or be required to pay the covered maritime service fees or additional duties during the extended suspension period. According to the USTR's Federal Register Notice, the extension is intended to facilitate ongoing negotiations with China while the United States continues efforts to strengthen domestic shipbuilding capacity and supply chain resilience.
11/10/26	U.S. Trade Representative Notice of Determination to Extend Section 301 Investigation of Vietnam's Acts, Policies, and Practices Related to Intellectual Property Protection and Enforcement	Tariffs	The USTR has extended its ongoing Section 301 investigation into Vietnam's acts, policies, and practices related to intellectual property (IP) protection and enforcement by three months. The investigation was first initiated on May 29, 2026, and examines whether Vietnam's IP-related practices warrant action under Section 301 of the Trade Act of 1974. The USTR determined that

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			the investigation involves complex or complicated issues requiring additional time to evaluate. Accordingly, USTR has extended the deadline for determining whether Vietnam's practices are actionable and whether trade remedies are warranted to February 28, 2027. The extension does not impose new tariffs or other trade restrictions but preserves the possibility of future trade measures depending on the investigation's outcome.
11/10/26	U.S. Trade Representative Notice of Product Exclusion Extensions: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation	Tariffs	The USTR announced that all 178 existing product exclusions from Section 301 tariffs on certain Chinese-origin goods will be extended through January 9, 2027. The exclusions were previously scheduled to expire on November 9, 2026, and include 164 product-specific exclusions covering various industrial and consumer goods and 14 exclusions for certain solar manufacturing equipment. The USTR explained that the extension was appropriate in light of ongoing trade discussions with China and followed consideration of public comments, advisory committee recommendations, and input from the interagency Section 301 Committee. The extensions apply to qualifying products entered for consumption, or withdrawn from warehouse for consumption, beginning November 10, 2026, through January 9, 2027.
11/9/26	Bureau of Industry and Security (BIS) Extension of the Suspension of Expansion of End-User Controls for	Export Controls	On November 9, 2026, the Bureau of Industry and Security (BIS) published a final rule extending the suspension of its Affiliates Rule through January 10, 2027. Originally published on September 29, 2025, the Affiliates Rule would

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	Affiliates of Certain Listed Entities		expand certain end-user restrictions under the Export Administration Regulations (EAR) to entities that are 50% or more owned, directly or indirectly, by one or more parties on the Entity List, Military End-User (MEU) List, or certain other restricted-party lists. BIS initially suspended the rule for one year in November 2025, with the suspension scheduled to expire on November 9, 2026. The latest action extends that suspension for approximately two additional months, meaning the expanded restrictions on affiliates will not take effect during this period. Companies should continue screening transaction parties against applicable restricted-party lists and monitoring potential changes to the Affiliates Rule before the new January 10, 2027, expiration date, particularly where transactions involve subsidiaries or affiliates of listed entities. See our prior article on the Affiliates Rule here for more details.
11/4/26	Office of Foreign Assets Control (OFAC) OFAC Alert: Iranian Shadow Fleet Reliance on False Flags for Sanctions Evasion	Economic Sanctions	OFAC published a new warning regarding sanctions risks associated with vessels using fraudulent flag registrations to evade U.S. sanctions on Iran. OFAC explains that vessels involved in transporting Iranian-origin petroleum and petrochemicals increasingly rely on "false flags," including registrations issued by unauthorized or fraudulent ship registries and flags falsely claimed without valid registration documentation, to conceal their activities. The alert follows recent OFAC sanctions targeting networks that operated fraudulent vessel registries, including entities that continued

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			issuing flag registrations after losing authorization from the relevant governments. OFAC identifies several red flags indicating potential sanctions evasion, including inconsistent vessel registration information, discrepancies between a vessel's reported flag and Maritime Mobile Service Identity number, and registration documents that cannot be independently verified. OFAC emphasizes that insurers, financial institutions, shipping companies, and other maritime service providers face sanctions enforcement risks if supporting vessels engaged in sanctions evasion and encourages enhanced due diligence where fraudulent flagging is suspected.
10/29/26	The White House Memorandum of Understanding Between The Government of the United States of America and the Government of Finland Regarding the Technology Prosperity Deal	Trade policy	The United States and Finland signed a Memorandum of Understanding (MOU) establishing a Technology Prosperity Deal to strengthen bilateral cooperation on emerging technologies, industrial supply chains, and strategic trade. The agreement focuses on expanding trade and investment in semiconductors, telecommunications, quantum technologies, advanced manufacturing, energy infrastructure, biotechnology, and shipbuilding. Under the MOU, both governments intend to coordinate export financing and commercial diplomacy to promote exports in third-country markets, particularly in telecommunications equipment, software, and 5G and 6G infrastructure. Additional initiatives include facilitating commercial deployment of nuclear technologies, strengthening

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			advanced semiconductor manufacturing, and expanding cooperation on icebreaker construction and Arctic maritime technologies. The MOU became operative upon signature on October 29, 2026, but is nonbinding.
10/28/26	The White House Adjusting Imports of Robotics, Industrial Machinery, and Their Parts and Components Into the United States	Trade Policy/Tariffs	President Trump issued a proclamation addressing imports of robotics, industrial machinery, and their parts and components under Section 232 of the Trade Expansion Act of 1962, following a Department of Commerce investigation identifying national security risks associated with reliance on foreign imports and cybersecurity vulnerabilities. The proclamation does not impose immediate tariffs or import restrictions. Instead, it directs the Secretary of Commerce and U.S. Trade Representative (USTR) to pursue or continue negotiations with foreign trading partners to address these national security concerns. The agencies must provide the President with an update on negotiations within 180 days of the October 28, 2026 proclamation. Commerce must also continue monitoring imports of covered products and report circumstances warranting further Section 232 action. Depending on the outcome of negotiations, the President may impose or modify tariffs, duties, quotas, or fees, or establish an incentive program to encourage investment in domestic robotics and industrial machinery production.

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10/26/26	Department of Treasury Outbound Investment Security Program Regulations	Outbound Investment	The Department of Treasury published a proposed rule to expand the U.S. Outbound Investment Security Program (OISP) to implement the Comprehensive Outbound Investment National Security (COINS) Act of 2025. The proposed rule would retain the existing framework requiring U.S. persons to notify Treasury of certain investments involving sensitive technologies while prohibiting other transactions that pose heightened national security risks. Importantly, the proposal would expand the countries of concern beyond China, Hong Kong, and Macau to include Cuba, Iran, North Korea, Russia, and Venezuela (under Nicolas Maduro's regime). The rule would also broaden the scope of covered technologies by adding high-performance computing, supercomputing, and hypersonic systems to the existing controls on semiconductors, microelectronics, artificial intelligence, and quantum information technologies, while introducing additional restrictions involving certain advanced technologies and biotechnology-related activities. Additionally, the proposal would establish new procedures for requesting confidential, nonbinding Treasury feedback on potentially prohibited transactions, clarify applicable exceptions and exemptions, and refine due diligence requirements for U.S. investors. Interested parties may submit public comments to the Department of Treasury for consideration through December 7, 2026. For more information, see the Treasury's OISP page here.

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10/23/26	The White House Further Modifying the Scope of Products of Canada Subject to the Additional Duties Imposed to Offset Canadian Discrimination Against the Commerce of the United States With Respect to Motor Vehicles	Tariffs	President Trump issued a proclamation modifying the scope of additional 50% tariffs on certain Canadian imports under Section 338 of the Tariff Act of 1930, further amending Proclamation 11048 of July 20, 2026, and subsequent modifications issued September 8, 2026. The proclamation removes certain Canadian products identified in Annex I, Part A, from the additional duties and subjects additional products identified in Annex I, Part B, to the 50% tariff. The changes are intended to offset alleged discriminatory treatment of U.S. motor vehicle and automotive parts exports by Canada. The additional duties apply on top of any applicable tariffs imposed under Section 232 of the Trade Expansion Act of 1962. The proclamation also modifies the Harmonized Tariff Schedule of the United States (HTSUS) to reflect the revised product coverage. These changes apply to goods entered or withdrawn from warehouse for consumption beginning at 12:01 a.m. Eastern Time on October 30, 2026. U.S. Customs and Border Protection (CBP) is authorized to issue implementing guidance and make additional technical modifications to the HTSUS through Federal Register notices.
10/23/26	The White House Fact Sheet: President Donald J. Trump Further Modifies Canadian	Tariffs	President Trump issued a proclamation modifying the scope of additional 50% tariffs on certain Canadian imports under Section 338 of the Tariff Act of 1930,

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	Products Subject to Tariffs Under Section 338		further amending Proclamation 11048 of July 20, 2026, and subsequent modifications issued September 8, 2026. The proclamation removes certain Canadian products, including plywood sheets, paper products, machinery, refrigeration equipment, and packing crates and boxes, from the additional tariffs, while adding other products, including certain valves, carpets, and waste products. The additional 50% duties apply to covered Canadian goods regardless of whether they qualify for preferential treatment under USMCA and are imposed in addition to any applicable Section 232 tariffs. The modifications to the Harmonized Tariff Schedule of the United States (HTSUS) apply to goods entered or withdrawn from warehouse for consumption beginning at 12:01 a.m. Eastern Time on October 30, 2026. U.S. Customs and Border Protection (CBP) is authorized to issue implementing guidance and make additional technical modifications to the HTSUS through Federal Register notices. See the full proclamation here.
10/22/26	The White House Adjusting Imports of Wind Turbines and their Parts and Components into the United States	Trade Policy	President Trump issued a proclamation addressing imports of wind turbines and their parts and components under Section 232 of the Trade Expansion Act of 1962, following a Department of Commerce investigation finding that such imports threaten to impair U.S. national security. The proclamation directs the Secretary of Commerce and U.S. Trade Representative (USTR) to pursue or continue negotiations with foreign

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			trading partners to address these national security concerns. The agencies must provide the President with an update on negotiations within 180 days of the October 22, 2026 proclamation. Commerce must also continue monitoring wind turbine imports and report circumstances warranting further Section 232 action. Depending on the outcome of negotiations, the President may impose additional import restrictions, including tariffs, particularly if agreements are not reached within 180 days or prove ineffective. The proclamation does not modify existing Section 232 tariffs on steel, aluminum, copper, or other covered products, which continue to apply to qualifying wind turbine components.
10/1/26	Directorate of Defense Trade Controls (DDTC) International Traffic in Arms Regulations (ITAR): Review of the U.S. Munitions List and Related Definitions and License Exemptions	Export Controls	On October 1, 2026, the U.S. Department of State published a proposed rule to amend the ITAR by narrowing the scope of the USML, clarifying regulatory definitions, and reducing unnecessary licensing requirements. The proposed rule would remove certain items from the USML, including specified canister launchers, most radar altimeters, certain protective eyewear, and various parts and components for military submersible vessels, potentially transferring these items to the jurisdiction of the Export Administration Regulations (EAR). Importantly, the rule would establish a new exclusion under ITAR § 120.35 for certain demilitarized items that have been permanently modified to remove all characteristics responsible for their

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			USML classification, allowing those items to fall outside ITAR jurisdiction even if they were originally designed for military use. However, the Department emphasizes that simply removing weapons, armor, or other military equipment may be insufficient if the item retains structural features or other design characteristics that continue to meet USML control criteria, meaning that a case-by-case technical assessment may be necessary. The rule would also clarify the definitions of "specially designed," "development," and "production," and introduce a new license exemption under ITAR § 123.26 for the temporary export of certain unclassified foreign defense articles to their original manufacturers or authorized service providers for repair or servicing. The Department is accepting public comments through November 30, 2026, providing an opportunity for industry stakeholders to seek additional clarification on the proposed revisions and identify other items or activities that may no longer warrant ITAR controls.
9/27/26	White House U.S.-China Board of Trade	Trade Policy	The White House announced that the U.S. and China will consider the following list of U.S. products for import into China and the following list of Chinese products for import into the United States with a view toward providing reduced tariff treatment to those goods in a reciprocal manner, consistent with their respective domestic laws and processes.
Signed: 9/18/26	Congress	Tariffs	On September 18, 2026, H.R. 5334, the Lindsey O. Graham Sanctioning Russia and Iran Act of 2026, became law as Public Law No. 119-

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Passed Senate: 08/07/26	Summary: H.R.5334 — 119th Congress (2025-2026)		111, imposing new sanctions, tariffs, and trade and investment restrictions related to Russia. The law requires visa and property-blocking sanctions on specified Russian individuals and entities and authorizes tariffs of up to 100% ad valorem on imports from countries that are among the five largest importers of Russian-origin crude oil or natural gas if they knowingly make new purchases of those products after enactment. The law also prohibits the export, reexport, or in-country transfer of U.S.-produced energy or energy products to or within Russia, prohibits U.S. persons from making new investments in Russia or purchasing Russian sovereign debt, and bars trading securities of certain Russian government-owned, controlled, or affiliated entities on U.S. national securities exchanges. In addition, the law extends the Iran Sanctions Act of 1996 through 2031. The law was enacted on September 18, 2026, with the tariff provision applying to qualifying new purchases made after that date.
9/16/26	White House Fact Sheet: President Donald J. Trump Restores Reciprocity in Government Procurement	Trade Policy	The Memorandum directs the Office of Management and Budget and the U.S. Trade Representative, in coordination with the Federal Acquisition Regulatory Council, to identify Canadian-origin items that may be removed or made unavailable for federal purchase in response to restrictions affecting U.S. companies in Canadian federal and provincial procurement markets. It also directs USTR to continue monitoring Canada's treatment of U.S.-origin goods and to recommend further action or

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			restoration of procurement access as circumstances change. The Memorandum took effect on September 16, 2026, but does not itself impose an immediate blanket prohibition on Canadian-origin goods. Specific purchasing restrictions will depend on subsequent implementation by OMB, USTR, the FAR Council, and federal agencies.
9/8/26	White House Fact Sheet: President Donald J. Trump Responds to Canada's Retaliation	Tariffs	President Trump signed five proclamations under Section 338 of the Tariff Act of 1930 imposing new import bans and modifying existing tariffs on certain Canadian products in response to Canada's treatment of U.S. exports. The proclamations prohibit imports of certain Canadian alcoholic beverages, dairy products, and other products that had been subject to 50% Section 338 tariffs, and revise the scope of existing tariffs by removing certain products, including rock salt and cement, and adding others, including all-terrain vehicles and additional dairy products. The Section 338 tariffs apply to covered goods regardless of whether they qualify for preferential treatment under the USMCA and are imposed in addition to applicable Section 232 tariffs. The product additions and removals took effect September 15, 2026, while the new import bans take effect September 29, 2026.
8/6/26	White House The White House Adjusting Imports of Polysilicon and its Derivatives into the United States	Tariffs	The White House announced a presidential proclamation imposing new measures on imports of polysilicon and polysilicon derivatives based on national security and supply-chain concerns. The proclamation establishes a

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			minimum import price program for polysilicon and its derivatives and imposes a 15% ad valorem tariff on derivative products downstream of polysilicon to encourage domestic production and onshoring. The proclamation also authorizes the Secretary of Commerce to establish an incentive program for companies that invest in building, expanding, or refurbishing U.S. facilities producing polysilicon and its derivatives. The tariffs and other remedies take effect December 4, 2026. For more information, see the White House Fact Sheet here.
7/31/26	White House To Facilitate Positive Adjustment to Competition from Imports of Quartz Surface Products	Tariffs	President Trump issued a proclamation implementing a four-year safeguard measure in the form of a tariff-rate quota (TRQ) on imports of quartz surface products (QSP) under HTSUS subheadings 6810.99.0020, 6810.99.0040, and 7020.00.6000, pursuant to Sections 201 and 203 of the Trade Act of 1974, following the ITC's finding that increased imports were a substantial cause of serious injury to the U.S. QSP industry. The TRQ provides for annual increases in within-quota quantities and reductions in duty rates during the second, third, and fourth years. The measure generally applies to all countries but excludes Canada, Mexico, Australia, CAFTA-DR countries, Colombia, Israel, South Korea, Panama, Peru, Singapore, and CBERA beneficiaries based on applicable statutory and trade-agreement findings. Qualifying developing countries are also excluded where their individual import share does not exceed 3%, provided all countries below that threshold collectively account for

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			no more than 9% of total imports. The USTR may extend the safeguard to excluded countries in response to import surges or circumvention and may modify country exclusions through Federal Register notices. The measure applies to goods entered or withdrawn from warehouse for consumption beginning August 15, 2026.
7/30/26	The White House Presidential Determination Pursuant to Section 101 of the Defense Production Act of 1950, as Amended, on Recoverable Critical Minerals and Materials	Export Controls	The President determined under Section 101 of the Defense Production Act of 1950 (50 U.S.C. § 4511) that recoverable critical minerals and materials (CMMs) are scarce, critical materials essential to national defense and that domestic defense requirements cannot otherwise be met without causing significant disruption and hardship in the civilian market. Recoverable CMMs include black mass, end-of-life rare-earth permanent magnets and other fully manufactured goods, swarf, and waste or scrap containing CMMs. Copper scrap is excluded because it is already covered by Proclamation 10962 of July 30, 2025. The determination authorizes the Secretary of Commerce to use Section 101 DPA authorities, as delegated under Executive Order 13603, to issue regulations, rules, guidance, and procedures to secure an adequate supply of recoverable CMMs. Importantly, the Secretary of Commerce may enact new export controls covering CMMs under this authorization from the President. For more information, see the White House Fact Sheet here.
7/30/26	White House	Export Controls	President Trump signed a Presidential Determination delegating authority under the

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	Fact Sheet: President Donald J. Trump Delegates Defense Production Act Authority with Respect to Recoverable Critical Minerals and Materials That Are Essential to Our National Defense		Defense Production Act (DPA) to the Secretary of Commerce to impose export restrictions on recoverable critical minerals and materials (CMMs). The Determination finds that CMMs are essential to national defense, including military production, critical infrastructure, advanced defense systems, and high-performance military equipment, and that U.S. reliance on foreign sources for certain CMMs creates a risk of serious and sustained supply-chain disruptions. The action focuses on CMMs that can be reclaimed and recycled from end-of-life products and industrial waste, including materials contained in finished goods such as permanent magnets and lithium-ion batteries. The delegated authority allows the Commerce Secretary to institute export restrictions to strengthen domestic supplies and reduce national security risks arising from foreign dependence.
7/28/26	Office of the United States Trade Representative (USTR) Notice of Actions in Section 301 Investigations of Acts, Policies, and Practices of Various Economies Related to the Failure of Each Economy To Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced With Forced Labor	Tariffs	The USTR announced new Section 301 tariff actions arising from 60 investigations into foreign economies' failure to impose and effectively enforce prohibitions on the importation of goods produced with forced labor. The USTR determined that the identified acts, policies, and practices are unreasonable, burden or restrict U.S. commerce, and are therefore actionable under Sections 301(b) and 304(a) of the Trade Act of 1974. Pursuant to presidential direction, the USTR imposed a 10% additional tariff on goods from 17 economies, including Canada, Mexico, India, Indonesia, Malaysia, and the United Kingdom, that have

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			adopted forced-labor import restrictions, made related commitments, or otherwise taken responsive measures, while goods from most other investigated economies are subject to a 12.5% additional tariff. For products of the European Union and Taiwan, the Section 301 duty is calculated so that the combined MFN and Section 301 tariff rate generally does not exceed 10%, while products of Japan, South Korea, and Switzerland are subject to a similar mechanism capped at a 12.5% tariff rate. The notice also exempts specified products, including certain critical raw materials, products that could cause economy-wide supply disruptions, goods unavailable in sufficient quantities from U.S. or alternative sources, and certain products for which tariffs would not effectively address the underlying forced-labor practices. The USTR further announced plans, when feasible, to establish three-year tariff-rate quotas for certain textile and apparel imports from Bangladesh, Cambodia, Indonesia, and Malaysia based on those countries' purchases of U.S. cotton and textile inputs. The additional duties are effective July 24, 2026. For more details, see our trade alert here.
7/27/26	U.S. Department of Commerce, Bureau of Industry and Security (BIS) Department of Commerce Streamlines Export Controls for Sound Suppressors	Export Controls	BIS announced that, effective November 20, 2026, certain silencers, mufflers, and sound suppressors will be transferred from the State Department's U.S. Munitions List (USML) to the Commerce Department's Commerce Control List (CCL) and become subject to the Export Administration Regulations (EAR).

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			BIS will require licenses for certain exports, reexports, and in-country transfers of the newly controlled suppressors, including releases of related software and technology to foreign persons. License exceptions currently available for firearms will also apply to suppressors. The change aligns suppressor controls with the existing EAR framework for firearms and reduces the regulatory burden associated with their export while maintaining licensing requirements for covered transactions.
7/20/26	White House Proclamation: Further Strengthening Actions Taken to Adjust Imports of Aluminum Into the United States	Tariffs	President Trump issued a proclamation adjusting the tariff regime on imports of aluminum under Section 232 of the Trade Expansion Act of 1962 to better promote domestic aluminum production. The proclamation directs the Secretary of Commerce to establish an incentive program for companies that invest in building, expanding, or refurbishing U.S. aluminum smelters. Under the program, approved companies may import a commensurate amount of primary aluminum at a reduced tariff rate equal to 50% of the applicable Section 232 tariff rate if they submit and comply with approved onshoring plans. Commerce will monitor compliance and may revoke tariff benefits, including retroactively, if companies fail to meet investment commitments. The action is intended to increase U.S. primary aluminum capacity, which the administration identified as a national security concern due to aluminum's use in defense-related products, including armored vehicles, naval vessels, spacecraft,

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			and missiles. For more information, see the White House Fact Sheet here.
7/20/26	White House Fact Sheet: President Donald J. Trump Imposes Additional Tariffs on Canada	Tariffs	President Trump issued three proclamations imposing additional 50% tariffs on certain Canadian imports under Section 338 of the Tariff Act of 1930. The tariffs are set to take effect on August 19, 2026, which will mark the first time in history that tariffs have been implemented under Section 338. The tariffs target Canadian goods allegedly subject to discriminatory treatment of U.S. exports, including automobiles, alcoholic beverages, and dairy products. The tariffs cover a broad array of products including wine, hockey sticks, cement, and other Canadian imports. Exempt products include energy, potash, goods already subject to Section 232 tariffs, fish, critical minerals, and certain other products. The White House stated the tariffs are intended to offset alleged burdens on U.S. commerce caused by Canadian tariffs, quotas, and trade restrictions. See the full proclamation on dairy products here, the proclamation on motor vehicles here, and the proclamation on alcoholic beverages here. For more details, see our trade alert article.
7/14/26	Bureau of Industry and Security Enhanced Favorable Treatment for the United Arab Emirates Under the Export Administration Regulations	Export Controls	The Bureau of Industry and Security (BIS) amended the Export Administration Regulations (EAR) to give the United Arab Emirates (UAE) more favorable export treatment. The rule removes the UAE from Country Groups D:3 (Chemical & Biological) and D:4 (Missile Technology) and adds it to Country Group A:5, expanding

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			access to EAR license exceptions. Approved UAE government agencies and approved commercial entities may now use License Exception STA (Strategic Trade Authorization) for certain military, space, and dual-use items that previously required export licenses. The rule also allows approved UAE entities and certain approved U.S.-headquartered AI companies operating in the UAE to receive specified advanced computing items without a license, while maintaining licensing requirements for other advanced computing exports. BIS established a process for UAE companies to seek approval for these authorizations and continues to maintain end-use, end-user, and recordkeeping requirements under the EAR. Effective July 10, 2026.
7/13/26	Department of War Forging the Arsenal of Freedom: Department of War Suspends CMMC Phase II Requirements	Government Contracts/ Cybersecurity Compliance	The Department of War announced the immediate suspension of Cybersecurity Maturity Model Certification (CMMC) Phase II requirements, which had been scheduled to take effect on November 10, 2026. Contractors are no longer required to prepare for the Phase II certification rollout, and all pending and future CMMC implementation milestones in Department solicitations and contracts are suspended while the program is reviewed. The Department will continue enforcing cybersecurity requirements through NIST SP 800-171 Rev. 2 self-assessments and select government-led assessments. Contractors and subcontractors remain obligated to protect covered defense information

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			under DFARS clause 252.204-7012. The Department has also established a CMMC Reform Task Force to review the program and recommend alternative cybersecurity compliance measures within 60 days.
7/9/26	White House Adjusting Imports of Commercial Aircraft, Jet Engines, And Aircraft and Engine Parts into the United States	Tariffs	President Trump issued a proclamation finding that imports of commercial aircraft, jet engines, and related parts threaten to impair U.S. national security under Section 232 of the Trade Expansion Act. The proclamation emphasizes the aerospace sector's importance to national defense, transportation, emergency response, cargo movement, tourism, and the domestic skilled workforce. It cites concerns regarding foreign supply-chain dependence, reduced U.S. manufacturing capacity, workforce contraction, foreign trade practices, and potentially unsafe or counterfeit imported components. The proclamation does not immediately impose new tariffs or other import restrictions. Instead, it directs the Secretary of Commerce and the U.S. Trade Representative to negotiate with trading partners and report on progress within 180 days. The President may impose tariffs or other measures later if negotiations do not adequately address the identified national-security concerns.
6/29/26	The White House Declaration of Emergency and Authorization for Temporary Duty-Free Importation of Phosphate Fertilizer from Morocco	Tariffs	The proclamation directs the Secretaries of Treasury and Commerce, after consultation with the Secretary of Homeland Security, to permit the temporary duty-free importation of phosphate fertilizers from Morocco. Covered imports may enter free of duties

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			and estimated duty deposits under Sections 1671, 1675, and 1677j of Title 19, if applicable. The duty-free treatment applies until the earlier of eight months after the proclamation or the end of the declared emergency. The proclamation also allows temporary extensions of deadlines for acts related to covered Moroccan phosphate fertilizer imports during the same period.
6/25/26	Office of the United States Trade Representative The United States and Uzbekistan Announce Early Harvest on Trade, Accelerate Agreement on Reciprocal Trade and Investment Talks	International Trade/ Tariffs	USTR announced that the United States and Uzbekistan reached an early harvest of trade commitments and agreed to accelerate talks toward an Agreement on Reciprocal Trade and Investment. Uzbekistan committed to eliminate or reduce tariffs on certain U.S. industrial and agricultural products, while the United States agreed to provide favorable consideration for Uzbekistan goods in tariff actions where consistent with U.S. law. The announcement also highlights expanded investment cooperation and continued U.S. support for Uzbekistan's WTO accession.
6/22/26	Office of Foreign Assets Control Authorizing the Production, Delivery and Sale of Crude Oil, Petrochemical Products, and Petroleum Products of Iranian-Origin through August 21, 2026	Economic Sanctions	OFAC issued General License X authorizing certain transactions related to the production, sale, delivery, or offloading of Iranian-origin crude oil, petrochemical products, and petroleum products through August 21, 2026. The license also covers related vessel services, including docking, anchoring, crew safety, emergency repairs, environmental protection, vessel management, bunkering, insurance, classification, and salvage. Payments owed to Iran, the Government of Iran, or blocked persons for covered purchases may be made in U.S. dollars. The license

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			also authorizes U.S. importation when it is necessary for the authorized sale, delivery, or offloading. The license does not authorize transactions involving North Korea, Cuba, the Covered Regions of Ukraine, Crimea, or entities connected to those jurisdictions, and does not authorize transactions prohibited under other sanctions authorities not listed in the license.
6/22/26	The White House Securing the Nation Against Cryptographic Attacks	Cybersecurity/ Government Contracts	The White House issued Executive Order 14409 directing federal agencies to transition Federal information systems to NIST-approved Federal Information Processing Standards for post-quantum cryptography. The order directs the FAR Council to publish a proposed rule requiring covered contractors to comply by December 31, 2030, with NIST FIPS standards, including all applicable FIPS incorporating post-quantum cryptography compliant algorithms. It also directs the FAR Council to publish a proposed rule amending FAR requirements and contract clauses for contractor vulnerability disclosure programs to address cryptographic vulnerabilities, lack of encryption, and use of non-FIPS-approved algorithms.
6/18/26	Office of the United States Trade Representative USTR Announces Initiation of Section 301 Investigation of Germany's Persistent Underpayment for Innovative Pharmaceutical Products	Tariffs	On June 18, 2026, USTR initiated a Section 301 investigation into Germany's alleged underpayment for pharmaceutical products. The investigation will examine whether Germany's pharmaceutical pricing policies restrict U.S. commerce by causing the United States to pay a disproportionate share of global pharmaceutical research and development costs. USTR specifically identified concerns

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			with Germany's use of supplemental discounts tied to confidential negotiated prices and mandatory variable-rate rebates. USTR has requested consultations with Germany. Interested parties must submit written comments, requests to appear at the hearing, and summaries of testimony by August 10, 2026. USTR will hold a public hearing on September 22, 2026. No trade remedy has been imposed at this stage.
6/18/26	Office of Foreign Assets Control Issuance of Venezuela-related General Licenses and Amended FAQ	Economic Sanctions	OFAC issued three Venezuela-related general licenses. General License 5X authorizes certain transactions related to the Petróleos de Venezuela, S.A. 2020 8.5 Percent Bond on or after August 4, 2026. General License 24A authorizes certain telecommunications and mail-related transactions involving the Government of Venezuela. General License 59 authorizes the supply of certain items and services involving Consorcio Venezolano de Industrias Aeronáuticas y Servicios Aéreos, S.A. OFAC also amended Venezuela-related FAQ 595.
6/17/26	Bureau of Industry & Security Robert Bosch GmbH (Bosch) To Pay $36 Million Penalty to BIS for Violations Pertaining to Shipments to Huawei	Customs Enforcement	BIS announced a $36.18 million settlement with Robert Bosch GmbH for alleged EAR violations involving shipments to Huawei and its affiliates. BIS stated that, from September 2020 to September 2024, Bosch exported approximately $72.37 million in foreign-produced MEMS sensor products and automotive software to Huawei without the required authorization. The items were subject to the EAR under the Foreign Direct Product Rule. Bosch voluntarily disclosed the conduct

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			and cooperated with BIS's investigation.
06/15/26	Directorate of Defense Trade Controls Proposed Rule International Traffic in Arms Regulations (ITAR): Part 130 Changes to Reduce Reporting Burden	Export Control	On June 15, 2026, the Department of State published a proposed rule to revise Part 130 of the International Traffic in Arms Regulations (ITAR), which governs reporting of certain political contributions, fees, and commissions connected to defense sales to foreign militaries and international organizations. The rule would raise the covered transaction threshold from $500,000 to $1,000,000, the reporting threshold for political contributions from $5,000 to $10,000, and fees or commissions from $100,000 to $200,000. Instead of reporting these payments with each license or approval, applicants and suppliers would generally submit one annual report to DDTC during registration renewal. The rule would also create a standardized electronic reporting form and require senior officer certification that the report is complete and accurate. Comments on the proposed rule are due August 14, 2026.
6/15/26	U.S. Supreme Court *HMTX Industries, LLC v. United States* *Case No. 2023-1891*	Tariffs	The U.S. Supreme Court declined to hear *HMTX Industries v. United States*. This means the Federal Circuit Court's decision remains in place. That decision upheld the Trump Administration's first-term Section 301 tariffs on Chinese imports. Petitioners challenged whether the USTR had the authority to impose and later change the List 3 and List 4A tariffs under Section 301 of the Trade Act of 1974 and whether the USTR followed rulemaking procedures

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			according to the Administrative Procedure Act (APA). Since the Supreme Court denied review of the case, the Section 301 tariffs on Chinese goods remain in effect. The related Section 301 cases still pending before the Court of International Trade are likely to move toward dismissal or another procedural resolution.
6/3/26	White House Strengthening Customs Enforcement	Customs Enforcement	The White House issued an Executive Order directing DHS and CBP to strengthen customs enforcement through new importer of record (IOR), disclosure, penalty, and enforcement requirements. Within 180 days, DHS must revise IOR eligibility rules to require minimum tangible domestic assets or increased bond coverage, additional ownership and beneficial ownership disclosures, anticipated import volumes, business affiliation information, and domestic asset disclosures. The order also directs CBP to prohibit foreign IORs from filing informal entries and to impose heightened formal entry requirements, including limits on continuous bond use and possible CTPAT validation or use of a CTPAT-validated customs broker. DHS must also define IOR "good standing," update the IOR registry, create risk-based IOR tiers, and enhance vetting for IORs, customs brokers, bonded merchandise custodians, and freight forwarders. The order further requires heightened import certifications, stronger enforcement against forced labor, misclassification, undervaluation, and transshipment, revised mitigation standards with penalty

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			floors, faster disposal of noncompliant imports, annual enforcement transparency reports, and legislative recommendations within 45 days
6/1/26	OFAC Guidance Publication of Introduction to OFAC Guide	Economic Sanctions	OFAC published an "Introduction to the Office of Foreign Assets Control" guide to provide U.S. and foreign persons with a foundational overview of how OFAC sanctions operate and how to comply with them. The guide covers core sanctions compliance concepts including licensing, processes related to sanctions listings, and OFAC's enforcement role.
6/1/26	White House Proclamation Further Adjusting the Tariff Regimes for Imports of Aluminum, Steel, and Copper into the United States	Tariffs	The White House issued a proclamation modifying the Section 232 tariff regimes for aluminum, steel, copper, and derivative products, effective for covered goods entered on or after June 8, 2026. The proclamation expands the category of derivative products eligible for the temporarily reduced 15% duty to include agricultural equipment and certain predominantly residential HVAC systems and components, and temporarily modifies duties on mobile industrial equipment and machinery through December 31, 2027. It also adds aluminum lithographic plates and steel racks to the derivative product coverage under Proclamation 11021. The proclamation also lowers the threshold for a product to qualify as made "entirely" from U.S. aluminum, steel, or copper from 95% to 85% of the product's relevant metal content.
5/28/26	A Notice by the International Trade Administration and the	Tariffs	The International Trade Administration and USTR issued a Federal Register Notice amending the HTSUS to implement tariff-

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	Trade Representative, Office of United States Implementing Certain Tariff-Related Elements of a Trade and Security Agreement Between AIT and TECRO		related commitments from the January 15, 2026 memorandum of understanding between the American Institute in Taiwan and the Taipei Economic and Cultural Representative Office. Effective for goods entered or withdrawn from warehouse on or after May 1, 2026, the notice limits Section 232 duties on certain Taiwan-origin automobile parts, timber, lumber, and wood derivative products to a maximum 15% rate. For covered goods with a Column 1 duty rate of at least 15%, no additional Section 232 duty applies; for goods below 15%, the combined Column 1 and Section 232 rate is 15%. The notice also removes derivative Section 232 steel, aluminum, and copper duties from qualifying Taiwan-origin civil aircraft components and creates new HTSUS headings for covered Taiwan-origin vehicle and aircraft parts and wood products. Any required refunds of duties already collected will be processed under CBP's standard procedures. |
5/17/26	White House Fact Sheet: President Donald J. Trump Secures Historic Deals with China, Delivering for American Workers, Farmers, and Industry	International Trade	The White House announced that the United States and China have established two new bilateral institutions: the U.S.-China Board of Trade and the U.S.-China Board of Investment. The Board of Trade is designed to serve as a government-to-government mechanism for managing bilateral trade in non-sensitive goods. The Board of Investment is designed to provide a forum for addressing investment-related issues between the two governments.
5/6/26	U.S. Customs and Border Protection (CBP)	Tariffs	CBP published new guidance on the application of steel, aluminum, and copper tariffs under Section

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	CSMS # 68554727 - GUIDANCE: Technical Corrections to Section 232 Duties on Imports of Aluminum, Steel, and Copper		232 of the Trade Expansion Act of 1962. The guidance provides two updates – first, a new HTS subheading has been created to account for items provided for in subdivision (c) of U.S. note 16 that do not contain any aluminum, steel, or copper. Under this new subheading, these items are subject to a 0% Section 232 duty rate. The second guidance update clarifies that U.K.-origin steel items made by Tata Steel UK where the reported country of smelt and cast is the Netherlands may qualify for lower duty rates applicable to U.K.-origin products until January 1, 2028.
5/6/26	U.S. Trade Representative (USTR) Initiation of Second Four-Year Review Process: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation	Tariffs	The USTR announced the commencement of its second statutory four-year review of tariff actions taken under Section 301 of the Trade Act of 1974 in response to China's acts, policies, and practices related to technology transfer, intellectual property, and innovation. The China Section 301 tariffs have been in effect since 2018 during the first Trump administration and include tariff rates ranging from 0%-100% on a wide-variety of Chinse-origin imports. Representatives of a domestic industry that benefits from the Section 301 actions may submit requests to the USTR to continue the actions beginning May 7, 2026. After receiving requests by domestic industry to continue the actions, the USTR will announce the implementation of the second phase of the review which will include opportunity for interested parties to submit public comments on the effectiveness of the Section 301 actions, suggestions for other

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			actions that could be taken, and other related topics.
5/1/26	White House Imposing Sanctions on Those Responsible for Repression in Cuba and for Threats to United States National Security and Foreign Policy	Economic Sanctions	President Trump issued an executive order expanding U.S. sanctions authorities targeting Cuba and persons connected to repression, corruption, or other conduct deemed threatening to U.S. national security and foreign policy. The E.O. builds on the national emergency declared in Executive Order 14380 and authorizes blocking sanctions against foreign persons operating in key sectors of the Cuban economy, including energy, defense and related materiel, metals and mining, financial services, and security. It also authorizes sanctions against persons acting for or on behalf of the Government of Cuba, persons materially supporting blocked parties, senior officials or leaders of sanctioned entities, individuals involved in serious human rights abuses or corruption in Cuba, and adult family members of designated persons. The E.O. prohibits U.S. persons from engaging in transactions involving blocked property and also prohibits evasive conduct, conspiracies, and certain donations to sanctioned persons. In addition, the order imposes visa restrictions on sanctioned individuals and authorizes sanctions on foreign financial institutions that conduct or facilitate significant transactions for persons blocked under the order, including correspondent account restrictions or full blocking sanctions. For more information, see the White House Fact Sheet here.
4/13/26	U.S. Customs and Border Protection (CBP)	Tariffs	CBP published further guidance on the process for importers to request

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	CSMS # 68340863 - UPDATE - Consolidated Administration and Processing of Entries (CAPE) for IEEPA Refunds, April 20, 2026, Deployment		refunds of IEEPA tariffs previously struck down by the Supreme Court via the Cargo Systems Messaging Service (CSMS). The CSMS bulletin lays out the steps to the IEEPA tariff refund process and explains how importers should request refunds through the Consolidated Administration and Processing of Entries (CAPE) system. Importantly, the CSMS bulletin states that Phase 1 of the CAPE process will begin on April 20, 2026 allowing a wide range of importers to submit refund requests to CBP.
4/6/26	Court of International Trade Case No. 1:26-cv-01259-RKE *Atmus Filtration, Inc. v. United States*	Tariffs	The Court of International Trade (CIT) approved plaintiff's voluntary dismissal request in the *Atmus Filtration* case, the lead case for IEEPA tariff refund suits. The dismissal order itself does not provide details on the plaintiff's reasoning. Proceedings in the CIT related to IEEPA tariff refunds and CBP's continued development of a refund process will likely proceed under a new lead case.
4/2/2026	White House Strengthening Actions Taken to Adjust Imports of Aluminum, Steel, and Copper into the United States	Tariffs	President Trump issued a proclamation updating Section 232 tariffs on aluminum, steel, and copper products. Under the new proclamation, the Section 232 metal tariffs will apply to the full value of the imported aluminum, steel, or copper product as opposed to the product's metal content percentage. Covered articles made entirely or almost entirely of aluminum, steel, or copper are generally subject to a 50% tariff while covered articles substantially made of steel, aluminum, or copper are subject to a 25% tariff rate, with certain exclusions. The derivatives

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			inclusion process used previously to expand coverage of the tariffs to additional products is now terminated. Instead, the Secretary of Commerce and the United States Trade Representative are authorized to include additional derivatives on a rolling basis. The new tariff rates are effective April 6, 2026. For more details see our trade alert here and the White House Fact Sheet here.
4/2/2026	White House Adjusting Imports of Pharmaceuticals and Pharmaceutical Ingredients into the United States	Tariffs	President Trump issued a proclamation setting a default 100% tariff rate for imports of patented pharmaceutical products and related ingredients. Companies with an approved plan to onshore production can receive a reduced 20% tariff, but that lower rate rises to 100% after four years. Companies that have executed or are negotiating agreements with the government on MFN pricing may receive a 0% tariff rate. The proclamation also contemplates special treatment tied to certain partner-country arrangements, while generic pharmaceuticals, their related ingredients, and biosimilars are not subject to these Section 232 tariffs at this time. For more information, see our trade alert here and White House Fact Sheet here.
3/12/2026	Court of International Trade Case No. 1:26-cv-01259-RKE *Atmus Filtration, Inc. v. United States*	Tariffs	The Court of International Trade (CIT) docket for the *Atmus Filtration* case includes a Declaration from Brandon Lord, the Executive Director of U.S. Customs and Border Protection (CBP), on CBP's plan to comply with the CIT's March 4 Order related to the facilitation of IEEPA tariff refunds. The Order was suspended on March 6 following a previous Declaration

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			from Brandon Lord on CBP's inability to follow the Court's Order immediately. CBP is currently working on a new functionality in its system of record, the Automated Commercial Environment (ACE), called the Consolidated Administration and Processing of Entries (CAPE). CAPE will have 4 integrated components: Claim Portal, Mass Processing, Review and Liquidation/Reliquidation, and Refund. The components reflect both how CBP anticipates refund requests will proceed through CAPE and how CBP is structuring its development efforts. The components are 40-80% completed as of March 11. CBP expects a phased development for CAPE, and in the first phase CAPE will likely be able to process the majority of formal and informal entries on which IEEPA duties were paid, other than unliquidated entries subject to antidumping or countervailing duties, or entries for which the liquidation status in ACE is "Suspended," "Extended," or "Under Review," and certain other entry types such as warehouse withdrawals, entries designated on a drawback claim, etc.
3/12/2026	Federal Register Initiation of Section 301 Investigations of Acts, Policies, and Practices of Various Economies Related to the Failure to Impose and Effectively Enforce a Prohibition	Tariffs	The U.S. Trade Representative (USTR) initiated investigations into whether the acts, policies, and practices of certain economies related to the failure to impose and effectively enforce a ban on the importation of goods produced with forced labor are unreasonable or discriminatory and burden or restrict U.S. commerce. The

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	on the Importation of Goods Produced with Forced Labor		investigations are initiated under Section 301 of the Trade Act of 1974 and focus on 60 nations, including Brazil, Bangladesh, Canada, China, the European Union, India, Israel, Pakistan, Taiwan, and the United Kingdom. The USTR will hold hearings in regards to these investigations on April 28, 2026, and interested parties should submit written comments and requests to appear at the hearings by April 15, 2026. Interested parties may submit comments related to any issue covered by these investigations. Additionally, the USTR specifically seeks comments on whether any economies being investigated have or is in the process of establishing a forced labor import prohibition and whether such prohibitions are being effectively enforced; how any failure to enforce such prohibitions discriminates against U.S. goods, is unreasonable, has negatively affected U.S. commerce, or constitutes a persistent pattern of conduct that permits any form of forced or compulsory labor; what action should be taken to address these issues; and the appropriate aggregate level of trade to be covered by any additional duties on products of any economy being investigated. Importantly, these Section 301 investigations may lead to additional tariffs imposed on products imported from the identified countries.
3/11/2026	Federal Register Initiation of Section 301 Investigations: Acts, Policies, and Practices of Certain Economies	Tariffs	The U.S. Trade Representative (USTR) initiated investigations into whether the acts, policies, and practices of certain economies relating to structural excess capacity and production in

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	Relating to Structural Excess Capacity and Production in Manufacturing Sectors		manufacturing sectors are unreasonable or discriminatory and burden or restrict U.S. commerce. The investigations are initiated under Section 301 of the Trade Act of 1974 and focus on China, the European Union, Singapore, Switzerland, Norway, Indonesia, Malaysia, Cambodia, Thailand, Korea, Vietnam, Taiwan, Bangladesh, Mexico, Japan, and India. Interested parties may submit written comments and requests to appear for a public hearing from March 17, 2026, to April 15, 2026. Public hearings begin May 5, 2026, and the USTR specifically seeks comments on the challenged acts and practices, whether they are actionable under Section 301, the extent of harm to U.S. commerce, and what remedial action should be taken. Importantly, these Section 301 investigations may lead to additional tariffs imposed on products imported from the identified countries.
3/10/2026	U.S. Department of Justice Press Release: Department of Justice Releases First-Ever Corporate Enforcement Policy for All Criminal Cases	DOJ	The DOJ announced the publication of a new Corporate Enforcement Policy (CEP) that shall apply to all criminal matters. The department-wide CEP is designed to promote greater consistency, predictability, and fairness in how prosecutors handle corporate misconduct. Similar to past DOJ policies, the CEP states that the DOJ will decline to prosecute companies where no aggravating factors are present and the company voluntarily discloses misconduct to the DOJ, fully cooperates with the DOJ's investigation, and timely and appropriately remediates the misconduct. Additionally,

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			companies that do not qualify for a declination of prosecution because their good faith voluntary disclosure did not meet certain standards or certain aggravating factors are present may still receive certain benefits for their cooperation with the DOJ and remediation of misconduct. Such benefits may include the potential for a Non-Prosecution Agreement (NPA), lesser sentencing, no requirement for an independent compliance monitor, and a 50% reduction in penalties.
3/6/2026	U.S. Court of International Trade Case No. 1:26-cv-01259-RKE *Atmus Filtration, Inc. v. United States*	Tariffs	The Court of International Trade (CIT) issued an Update to the Order mandating that U.S. Customs and Border Protection (CBP) issue refunds for IEEPA tariffs that were determined to be unconstitutional. The update suspends the part of the Order that mandated immediate compliance following a declaration from Brandon Lord, the Executive Director of the CBP, that the CBP was not currently capable of immediately complying with the order.
3/5/26	U.S. Court of International Trade Case No. 1:26-cv-01472 *The State of Oregon et. al. v. Trump et. al.*	Tariffs	A group of 24 U.S. states filed suit in the Court of International Trade (CIT) challenging the Trump administration's implementation of new tariff actions under Section 122 of the Trade Act of 1974. Like the IEEPA tariff challenges, the state parties to this lawsuit allege that President Trump lacks authority under Section 122 to implement new global tariff rates making the tariffs unconstitutional.
3/4/2026	U.S. Court of International Trade Case No. 1:26-cv-01259-RKE	Tariffs	The Court of International Trade (CIT) issued an Order mandating that U.S. Customs and Border Protection (CBP) issue refunds for IEEPA tariffs that were determined

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	Atmus Filtration, Inc. v. United States		to be unconstitutional in a recent decision by the U.S. Supreme Court (see entry on 2/20/2026 below). The CIT's Order directs CBP to liquidate all unliquidated entries that were subject to IEEPA tariffs and reliquidate any liquidated entries that are not yet final "without regard to IEEPA tariffs." On March 6, 2026, two days after the CIT's initial ruling, the Court paused the requirement for "immediate compliance" by CBP based on CBP's indications that it would be approximately 45 days before a refund process is operational. While the CIT's Order does not provide specifics on what a refund process may entail, CBP has indicated in its response to the Order that the process may involve a series of validations of refund claims via ACE and require importers to provide a specific list of entries on which IEEPA duties were paid.
2/26/2026	Federal Register Request for Comments on the Design of a Plurilateral Agreement on Trade in Critical Minerals and Policy Actions to Strengthen the Resilience of Critical Mineral Supply Chains	Trade Policy	The Office of the United States Trade Representative (USTR) is soliciting public comments on the potential design of a plurilateral agreement on trade in critical minerals aimed at strengthening the resilience of critical mineral supply chains. The initiative reflects U.S. concerns about heavy reliance on foreign sources for minerals essential to defense systems, advanced technologies, and industrial production, and seeks policies that expand domestic production and diversification of supply chains among trusted trading partners. The notice requests public input on numerous design issues, including which minerals and trading partners

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			should be covered, how price mechanisms should be structured and enforced, and how to address regulatory arbitrage that could distort markets. It also seeks comments on rules governing investment in critical mineral supply chains, coordination among participating countries, and methods for implementing and enforcing such an agreement. Additionally, USTR asks for feedback on how to prevent circumvention, respond to market disruptions, and whether past agreements may serve as helpful reference points for the design of new agreements. Comments must be submitted through the USTR portal by March 19, 2026.
2/20/2026	White House Continuing the Suspension of Duty-Free De Minimis Treatment for All Countries	Tariffs	President Trump issued an Executive Order continuing the suspension of duty-free *de minimis* treatment for certain imports, including shipments sent through the international postal network. The Order re-affirms the suspension of duty-free *de minimis* treatment for certain imports that was previously announced in Executive Order 14324 on July 30, 2025, and clarifies that such imports shall be subject to the new 10% tariff rate implemented under Section 122 of the Trade Act of 1974.
2/20/2026	White House Imposing a Temporary Import Surcharge to Address Fundamental International Payments Problems	Tariffs	President Trump issued a Proclamation instituting a 10% ad valorem "surcharge" (tariff), effective February 24, 2026, on imports from all countries. The new 10% tariff is implemented pursuant to Section 122 of the Trade Act of 1974 which enables the President to restrict imports, via surcharges, quotas, or other special measures to

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			address fundamental international payments problems. Under Section 122, the 10% tariff rate is effective for 150 days but may be extended upon receipt of Congressional approval. Importantly, certain products, including those subject to Section 232 tariffs, are exempt from the new 10% Section 122 tariff rate. The products exempted from the Section 122 tariffs are enumerated in paragraph 2 of Annex I and Annex II of the Proclamation.
2/20/2026	White House Ending Certain Tariff Actions	Tariffs	President Trump has issued an executive order ending tariffs enacted under IEEPA. This follows the Supreme Court case in the previous table entry. The order authorizes the head of each executive department to immediately take steps to effectuate this order and to stop the collection of the applicable tariffs as soon as practicably possible.
2/20/2026	U.S. Supreme Court Case Nos. 24-1287 & 25-250 *Learning Resources, Inc., Et al. v. Trump* & *V.O.S. Selections, Inc. v. Trump*	Tariffs	The U.S. Supreme Court issued a ruling finding that President Trump exceeded his constitutional authority by implementing tariff measures under the International Emergency Economic Powers (IEEPA) statute. As a result of this ruling, all IEEPA-based tariff measures are invalid, including the reciprocal tariff actions announced on "Liberation Day" and fentanyl/drug-trafficking tariffs targeting imports from Mexico, Canada, and China. For more information on the ruling and next steps, see our article here.
2/19/2026	White House Implementation of the Agreement	Tariffs	The White House announced the finalization of an agreement on reciprocal trade with Indonesia that was previously announced via a Joint Statement on July 22, 2025.

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	Toward a New Golden Age for the U.S.-Indonesian Alliance		As previously detailed, the agreement crystalizes a 19% reciprocal tariff rate for Indonesian imports in the U.S. and includes promises by Indonesia to remove trade barriers impacting a wide-range of U.S. exports. For more information on the trade agreement, visit the White House Fact Sheet here and our previous entry related to this agreement on 7/22/25.
2/12/2026	White House Joint Statement on a Framework for United States-North Macedonia Agreement on Reciprocal, Fair, and Balanced Trade	Tariffs	The United States and North Macedonia issued a Joint Statement announcing a new Agreement on reciprocal trade aimed at strengthening their bilateral economic relationship, expanding exporter access to each other's markets. Under the Agreement, the U.S. will keep its reciprocal tariff on goods originating from North Macedonia at 15%, while North Macedonia will eliminate all customs duties for U.S. industrial and agricultural goods. Both parties commit to address U.S. concerns with nontariff barriers, hold consultations to address and prevent barriers to U.S. agricultural goods in the Macedonian market, and strengthen economic and national security cooperation. Both parties also note their intention to enhance and facilitate commercial ties. North Macedonia commits to not enacting a digital service tax and support adoption of a permanent moratorium on customs duties on electronic transmissions at the World Trade Organization (WTO), enforce environmental protections, address labor issues with the U.S., and to stay committed to the WTO Joint Initiative on Services Domestic Regulation. Both parties will also

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			discuss further about intellectual property protections, and North Macedonia will purchase U.S. liquified natural gas following the completion of the new gas interconnector between North Macedonia and Greece.
2/9/2026	White House Joint Statement on United States – Bangladesh Agreement on Reciprocal Trade	Tariffs	The United States and Bangladesh issued a joint statement announcing a new Agreement on reciprocal trade aimed at strengthening their bilateral economic relationship, reducing trade barriers, and expanding market access for exporters on both sides. Under the Agreement, the U.S. will lower its reciprocal tariff on Bangladeshi originating goods to 19% and establish a mechanism to allow certain Bangladeshi textile and apparel products to enter the U.S. at rates of 0%. Bangladesh commits to provide preferential market access to a wide range of U.S. industrial and agricultural goods and to address key non-tariff barriers affecting trade and investment. The Agreement also includes commitments by Bangladesh to uphold internationally recognized labor rights, enforce environmental protections, strengthen intellectual property standards, and enhance regulatory practices. Both countries agreed to cooperate on data transfer, export controls, customs modernization, anti-corruption enforcement, and broader economic and national security alignment.
2/6/26	White House Establishing an America First Arms Transfer Strategy	National Security/Export Controls	The White House issued an executive order establishing an "America First Arms Transfer Strategy," recalibrating U.S. policy governing Foreign Military Sales (FMS) and Direct Commercial Sales (DCS) opportunities. The

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			Strategy explicitly links defense export decisions to the strength, scale, and resilience of the U.S. defense industrial base. The EO directs the Departments of War, State, and Commerce to undertake coordinated implementation actions over the coming months, including developing a prioritized sales catalog of U.S. defense articles and services available for export, increasing structured engagement with U.S. industry, and identifying opportunities to leverage FMS and DCS to expand U.S. production capacity and technological leadership. The EO also calls for reforms to existing arms transfer processes, including establishing an end-use monitoring coordination group, revising third-party transfer procedures, streamlining Congressional notifications, and establishing the Promoting American Military Sales Task Force.
2/6/26	White House United States-India Joint Statement	Tariffs	The United States and India issued a joint statement announcing a framework for an Interim Agreement on reciprocal and mutually beneficial trade as part of ongoing negotiations toward a broader U.S.–India bilateral trade agreement. Under the Interim Agreement, India will eliminate or reduce tariffs on all U.S. industrial goods and a wide range of U.S. food and agricultural products, including dried distillers' grains, red sorghum for animal feed, tree nuts, fresh and processed fruit, soybean oil, wine and spirits. The United States agreed to implement an 18% reciprocal tariff rate for Indian-origin imports, replacing

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			higher previous rates, and to remove reciprocal tariffs on certain items including generic pharmaceuticals, gems and diamonds, and aircraft parts, upon successful conclusion of the interim deal. India also signaled its intention to significantly increase purchases of U.S. products, including energy, information and communication technology, and other goods, over the coming years. Both countries committed to address non-tariff barriers, negotiate rules of origin that ensure benefits accrue mainly to U.S. and Indian products, and strengthen cooperation on supply-chain resilience and economic security.
2/6/26	White House Modifying Duties to Address Threats to the United States By the Government of the Russian Federation	Tariffs	This Order amends previous Executive Order 14329 which established a 25% tariff on Indian imports due to India's import of Russian-origin oil products. The new EO removes the 25% additional tariff on Indian-origin imports based on India's recent commitment to stop purchasing Russian oil and establishment of a framework for defense cooperation with the U.S. The EO also requires the Secretary of Commerce, in coordination with other senior officials, to monitor whether India resumes imports of Russian oil and to recommend further action, including potentially reimposing the duty, if that occurs.
2/6/26	White House Addressing Threats to the United States By the Government of Iran	Tariffs	The White House issued an executive order reaffirming that Iran's actions continue to pose an unusual and extraordinary threat to U.S. national security, foreign policy, and economic interests. pursuant to authorities including the

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			International Emergency Economic Powers Act (IEEPA) and the National Emergencies Act, the EO maintains and strengthens existing U.S. measures targeting the Iranian government. Most notably, it authorizes the imposition of additional tariffs on imports from foreign countries that directly or indirectly purchase goods or services from Iran. The Secretary of Commerce, in consultation with the Secretary of State and other relevant agencies, is tasked with identifying such countries and recommending appropriate tariff measures. The EO is designed to deter third-country economic engagement with Iran and increase economic pressure on the Iranian regime.
1/29/26	White House Addressing Threats to the United States by the Government of Cuba	Tariffs	The White House has issued an executive order designating the current Cuban regime's actions and policies a national emergency. The order also establishes a tariff system to deal with this emergency, where an additional tariff may be placed on goods imported to the US from countries that directly or indirectly supply Cuba with oil. This order does not state any specific tariff, but it authorizes a process for implementing tariffs on a country. The Secretary of Commerce, in consultation with others, will determine whether a country is supplying Cuba with oil as defined by the order and report that information to the Secretary of State. The Secretary of State, in consultation with others, will then determine whether and how much of a tariff is imposed. After, the Secretary of State will provide the recommendation and the Secretary

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			of Commerce will provide the findings to the president, who will make the final decision. For more information, visit here.
1/14/26	White House Adjusting Imports of Semiconductors, Semiconductor Manufacturing Equipment, And Their Derivative Products into the United States	Tariffs	President Trump issued a Presidential Proclamation imposing a 25% tariff on imports of certain advanced computing chips and derivative products described in the Annex to the Proclamation. The new tariffs are set to take effect on January 15, 2026 and will exclude products imported for certain uses in U.S. data centers and domestic manufacturing of semiconductor derivatives. The imposition of the 25% tariff follows the Department of Commerce's investigation into the national security impacts of semiconductors imports pursuant to Section 232 of the Trade Expansion Act of 1962. For more information visit the White House Fact Sheet here.
1/2/26	White House Regarding the Acquisition of Certain Assets of Emcore Corporation by Hiefo Corporation	Foreign Investment	President Trump issued an executive order prohibiting the acquisition of assets in Emcore Corporation, a digital chip manufacturer based in New Jersey, by HieFo Corporation, a Delaware corporation. Although HieFo is a U.S. company, the Order highlights that it is controlled by a citizen of China which results in the acquisition transaction coming under CFIUS jurisdiction. The Order instructs HieFo to divest its interests in the Emcore assets within 180 days. The Order emphasizes that the divestment is necessary to protect the national security interests of the U.S. and instructs HieFo and its Affiliates to destroy or transfer all intellectual property related to Emcore that they

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			may have in their control as part of the divestment action.
12/31/25	White House Amendments to Adjusting Imports of Timber, Lumber, and Their Derivative Products into the United States	Tariffs	President Trump issued a Presidential Proclamation amending tariff rates on imports of certain softwood timber and lumber, upholstered wooden products, kitchen cabinets, and vanities. Under Proclamation 10976, issued on September 29, 2025, softwood lumber and timber products are subject to a 10% duty rate, and upholstered wooden products, kitchen cabinets, and vanities are subject to a 25% duty rate that was set to increase on January 1, 2026 to 30% for upholstered wooden products and 50% for kitchen cabinets and vanities. This E.O. amends Proclamation 10976 to delay the increase in tariff rates on upholstered wooden furniture, kitchen cabinets, and vanities until January 1, 2027. For more information visit the White House Fact Sheet here.
12/30/25	Federal Register International Traffic in Arms Regulations: Exemption for Defense Trade and Cooperation Among Australia, the United Kingdom, and the United States	Export Controls	DDTC published a final rule implementing amendments to the International Traffic in Arms Regulations (ITAR) related to the defense trade cooperation between Australia, the UK, and the U.S. (AUKUS partners). Notably, the final rule adds a new license exemption set forth in section 126.7(c) of the ITAR for reexports, retransfers, or temporary imports of defense articles that support the armed forces of the AUKUS partners. The final rule also includes an update to the definition of "Authorized User" to ensure consistency throughout the ITAR and more clearly include certain Australian and UK government

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			departments and agencies not previously enumerated on DDTC's Authorized User List. As a result, license exemptions now cover a broader range of exports among UK and Australian government actors.
12/10/25	U.S. Trade Representative USTR Section 301 Action on Nicaragua's Acts, Policies, and Practices Relating to Labor Rights, Human Rights and Fundamental Freedoms, and the Rule of Law	Tariffs	The USTR implemented a new tariff action targeting imports from Nicaragua following the USTR's determination that Nicaragua's acts, policies, and practices are unreasonable and burden U.S. commerce. The tariff rate for Nicaraguan imports will be set to 0% on January 1, 2026, and be increased to 10% on January 1, 2027, and to 15% on January 1, 2028, pursuant to a "phase-in" process. The Section 301 tariffs will not apply to Nicaraguan imports that are originating under the Dominican Republic-Central America-United States Free Trade Agreement. The Section 301 tariffs will stack with the existing 18% reciprocal tariff rate currently in place for Nicaraguan imports.
12/4/25	White House National Security Strategy of the United States of America	National Security	The Trump administration published a new National Security Strategy outlining the administration's stance on key topics such as immigration, foreign relations, and global competition. An important theme carried throughout the Strategy is the promotion and prioritization of U.S. interests on the global stage. In addition, the Strategy highlights the importance of promoting peace in regions subject to ongoing conflicts, especially where such conflicts impair free trade and access to vital resources. The Strategy ultimately supports the Trump administration's foreign

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			policy objectives and actions to protect U.S. security and economic interests.
11/20/25	White House Modifying the Scope of Tariffs on the Government of Brazil	Economic Policy/Tariffs	The White House has issued an executive order amending the scope of the 40% tariff on Brazil to exclude certain agricultural products. This follows negotiations between the U.S. and Brazil after the increased tension between the two countries.
11/14/25	White House Joint Statement on a Framework for a United States – Switzerland – Liechtenstein Agreement on Fair, Balanced, and Reciprocal Trade	Economic Policy/Tariffs	The White House published a joint statement announcing that the U.S., Switzerland, and Liechtenstein agreed to a "Framework for an Agreement on Fair, Balanced, and Reciprocal Trade." Within this framework, Switzerland and Liechtenstein have committed to encouraging foreign direct investment into the U.S., promoting apprenticeship programs for U.S. workers, and collaborating with the U.S. to address potential distortions on trade and investment from industrial subsidies or actions of state-owned enterprises. Regarding tariffs, Switzerland and Liechtenstein agree to apply zero duties on all U.S. industrial goods, seafood, and certain agricultural goods; additionally, Switzerland and Liechtenstein will reduce tariffs to 0% on imports of U.S.-origin industrial goods, seafood, and certain agricultural products, as well as implement tariff rate quotas for certain agricultural goods. The U.S. will apply the higher of Most Favored Nation (MFN) tariff or a combined tariff rate (MFN and reciprocal tariff) of 15% to imports from Switzerland and Liechtenstein and apply only the MFN rate to imports of goods identified in the Annex to E.O. 14346. Additionally,

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			Section 232 tariffs on imports of pharmaceutical goods and semiconductors from Switzerland and Lichtenstein will be capped at a total rate of 15%. For more information, visit the White House Fact Sheet here.
11/14/25	White House Modifying the Scope of the Reciprocal Tariff with Respect to Certain Agricultural Products	Tariffs	President Trump issued an Executive Order modifying the scope of reciprocal tariffs to exclude their application to imports of certain agricultural products. The new exclusions include a variety of meats, nuts, fruits, coffee, teas, and juices and are effective November 13, 2025. For more information, visit the White House Fact Sheet here.
11/13/25	White House Joint Statement on Framework for United States-Argentina Agreement on Reciprocal Trade and Investment	Economic Policy/Tariffs	The White House published a joint statement announcing that the U.S. and Argentina agreed to "a Framework for an Agreement on Reciprocal Trade and Investment." Under this framework, both parties agree to open their markets for certain key exports. This includes the U.S. removal of reciprocal tariffs on certain imports of unavailable natural resources and non-patented articles for use in pharmaceuticals from Argentina. Argentina will provide preferential market access for U.S. exports of certain medicines, chemicals, machinery, IT products, medical devices, vehicles, and agricultural products. The U.S. may also take into consideration this agreement with Argentina when considering potential tariff actions under Section 232 of the Trade Expansion Act. Argentina has also agreed not to require consular formalities for U.S. exports and to phase out the statistical tax for U.S. goods. Among other terms, Argentina will

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			also align with international standards in sectors to facilitate trade and accept U.S. standards and regulations, address and align its IP regime with international standards, work on barriers for food and agricultural products, commit to labor and environmental protections, and commit to facilitating digital trade.
11/13/25	White House Joint Statement on Framework for United States-Guatemala Agreement on Reciprocal Trade	Economic Policy/Tariffs	The White House published a joint statement announcing that the U.S. and Guatemala agreed to a "Framework for an Agreement on Reciprocal Trade." Based on the framework agreement, Guatemala commits to address non-tariff barriers impacting U.S. exports of key products such as pharmaceuticals, medical devices, remanufactured goods, and automotives. Guatemala also commits to maintaining a "robust standard" for IP protection and enforcement, will adopt and maintain high levels of environmental protection, and will prohibit imports produced by forced labor. The U.S. commits to the removal of reciprocal tariffs on certain imports of Guatemalan products that cannot be gown, mined, or naturally produced in the U.S. in sufficient rates as well as certain textiles and apparel products originating under Dominican Republic-Central America-United States Free Trade Agreement (CAFTA-DR).
11/13/25	White House Joint Statement on Framework for United States-Ecuador Agreement on Reciprocal Trade	Economic Policy/Tariffs	The White House published a joint statement announcing that the U.S. and Ecuador agreed to a "Framework for an Agreement on Reciprocal Trade." Under the framework, Ecuador commits to reduce or eliminate tariffs on U.S.-

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			origin imports of certain machinery, health products, information and communication technology (ICT) goods, chemicals, vehicles, and agricultural products. Ecuador also commits to improving trade facilitation, IP protections, environmental and labor protections, and to not impose digital services taxes that are discriminatory towards the U.S. The U.S. commits to remove reciprocal tariffs on certain qualifying exports from Ecuador for products that cannot be grown, mined, or naturally produced in the U.S. in sufficient amounts.
11/13/25	White House Joint Statement on Framework for United States-El Salvador Agreement on Reciprocal Trade	Economic Policy/Tariffs	The White House published a joint statement announcing that the U.S. and El Salvador agreed to "a Framework for an Agreement on Reciprocal Trade" building on the economic relationship between the two countries, including the Dominican Republic-Central America-United States Free Trade Agreement (CAFTA-DR). Under this framework, El Salvador will commit to addressing non-tariff barriers affecting trade in priority areas, like streamlining regulatory requirements and approvals for U.S. exports, and to address and prevent barriers for U.S. agricultural exports. El Salvador also commits to moving forward with certain international IP treaties, preventing barriers on digital trade, and addressing certain concerns like labor and environmental protections. In turn, the U.S. will remove reciprocal tariffs on imports of certain products from El Salvador that cannot be grown, mined, or naturally produced in the U.S. as

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			well as certain textile and apparel imports originating under CAFTA-DR.
11/12/25	Federal Register One Year Suspension of Expansion of End-User Controls for Affiliates of Certain Listed Entities	Export Controls	Pursuant to the trade and economic agreement reached between the U.S. and China, BIS issued a final rule confirming the one-year suspension of the interim final rule "Expansion of End-User Controls to Cover Affiliates of Certain Listed Entities" ("BIS Affiliates Rule") effective November 10, 2025. The suspension means that the Affiliates Rule will not be enforced until the suspension expires on November 9, 2026.
11/07/25	Federal Register International Traffic in Arms Regulations: Changes to Section 126.1	Export Controls	The Department of State published an amendment to the International Traffic in Arms Regulations (ITAR) removing Cambodia from the Section 126.1 list of countries subject to export prohibitions. The amendment reflects the Secretary of State's determination to lift the defense trade embargo on Cambodia due to the country's renewed engagement with the U.S. and efforts in combatting transnational crime. License applications for exports of defense articles or services to Cambodia will now be reviewed on a case-by-case basis and certain licensing exemptions unavailable for exports to Section 126.1 countries will now be available for exports to Cambodia.
11/01/25	White House Fact Sheet: President Donald J. Trump Strikes Deal on Economic and Trade Relations with China	Economic Policy/Tariffs	The White House issued a Fact Sheet listing the actions that the U.S. and China are set to take pursuant to a new trade and economic deal. China's actions include the suspension of retaliatory tariffs, the suspension or removal of all retaliatory non-tariff

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			countermeasures taken against the U.S. since March 4, 2025, the termination of investigations into U.S. companies operating within the semiconductor supply chain. China will also suspend the global implementation of new export controls on rare earths and related measures from October 9, 2025; additionally, China will extend the availability of its market-based tariff exclusion process for U.S. imports for exclusions valid until December 31, 2026. In turn, the U.S. will lower the fentanyl trafficking tariffs on Chinese imports from 20% to 10%, effective November 10, 2025. In addition, the U.S. will suspend the implementation of heightened reciprocal tariffs on Chinese imports until November 10, 2026, and further extend the expiration of certain Section 301 tariff exclusions through November 10, 2026. Importantly, the U.S. commits to suspend for one year the implementation of the new BIS Affiliates Rule and responsive actions taken pursuant to the USTR's Section 301 investigation into China's Targeting the Maritime, Logistics, and Shipbuilding Sectors for Dominance.
10/28/25	Federal Register Initiation of Section 301 Investigation: China's Implementation of Commitments Under the Phase One Agreement; Notice of Hearing; and Request for Public Comments	National Security/Economic Policy	The USTR initiated a Section 301 investigation into China's actions and compliance with the 2020 "Economic and Trade Agreement Between the United States and the Government of the People's Republic of China" ("Phase One Agreement"). The initiation notice states that China's noncompliance has likely undermined U.S. companies' ability to compete in

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			trade or operations within China. It also alleges that China appears not to have followed through on commitments in areas like IP, forced technology transfer, agriculture, financial services, and its purchases of certain specified values of U.S. goods and services. The USTR invites interested parties to submit both oral and written comments. Written comments are due by December 1, 2025, and there will be a public hearing on December 16, 2025.
10/26/25	White House Joint Statement on a United States-Viet Nam Framework for an Agreement on Reciprocal, Fair, and Balanced Trade	Economic Policy/Tariffs	The White House published a joint statement announcing that the U.S. and Vietnam agreed to "a Framework for an Agreement on Reciprocal, Fair, and Balanced Trade." Under this framework, Vietnam will provide preferential market access for almost all U.S. industrial and agricultural goods, while the U.S. will maintain a 20% reciprocal tariff rate on Vietnamese imports and identify products from the list set out in Annex III to Executive Order 14346 of September 5, 2025 to receive a 0% reciprocal tariff rate. The two countries will collaborate to address both countries' interests in non-tariff barriers that impact bilateral trade in priority areas, finalize commitments on digital trade, and address certain concerns like labor and environmental protections. Both countries will also work together to address and prevent barriers to U.S. exports of agricultural to Vietnam and to enhance supply chain resilience.
10/26/25	White House Joint Statement on United States-Malaysia	Economic Policy/Tariffs	The White House published a joint statement on the "Agreement on Reciprocal Trade" developed between the U.S. and Malaysia.

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	Agreement on Reciprocal Trade		The joint statement provides that Malaysia will provide preferential market access for U.S. exports of industrial goods, agricultural products, and fuel ethanol. In addition, Malaysia has committed to address non-tariff barriers impacting U.S. exports of automotives, alloy steel pipes and other steel goods, cosmetics, pharmaceuticals, and medical devices. In turn, the U.S. will maintain a 19% reciprocal tariff rate for Malaysian imports and has identified products from Annex III to Executive Order 14346 to receive a 0% reciprocal tariff rate. Malaysia will adopt, maintain, and enforce high levels of environmental protections; additionally, Malaysia will increase enforcement against markets notorious for counterfeiting and piracy. Malaysia also commits to refrain from imposing certain digital services taxes, maintain IP, forced labor, and environmental protections, and refrain from imposing bans or quotas on exports of critical minerals to the U.S. The White House also published a Memorandum of Understanding, available here, concerning cooperation on the diversification of critical mineral supply chains and investments. The full text of the U.S.-Malaysia reciprocal trade agreement is available here.
10/26/25	White House Joint Statement on United States-Cambodia Agreement on Reciprocal Trade	Economic Policy/Tariffs	The White House published a joint statement with Cambodia announcing that the two countries reached an agreement on reciprocal trade. According to the joint statement, Cambodia commits to remove tariffs on all U.S. industrial goods and food and agricultural

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			products. In turn, the U.S. will maintain a 19% reciprocal tariff rate on Cambodian imports and identify products in Annex III to Executive Order 14346 to receive a 0% reciprocal tariff rate. Both countries will collaborate to address Cambodia's non-tariff barriers impacting U.S. exports of agricultural products to Cambodia. In addition, Cambodia commits to adopt and implement forced labor import bans and environmental protection laws. The joint statement also notes an upcoming commercial deal between companies from both nations. The full text of the U.S.-Cambodia agreement on reciprocal trade has been published here.
10/26/25	White House Memorandum of Understanding Between the Government of the United States of America and the Government of the Kingdom of Thailand Concerning Cooperation to Diversify Global Critical Minerals Supply Chains and Promote Investments	Economic Policy	The White House published a Memorandum of Understanding concerning cooperation efforts between the U.S. and Thailand related to critical mineral supply chains and investments. The Memorandum provides that both counties agree to the sharing of information, knowledge, and technical expertise aimed at improving Thailand's critical mineral sector. Notably, the Memorandum also states that the two countries expect to have the first opportunity to invest in relevant critical minerals assets that may be sold in Thailand. The U.S. and Thailand may engage in future cooperation in areas like the development of regulatory practices, streamlining permitting processes, and investment issues. The participants will also share information with each other as soon as possible and coordinate to protect their respective domestic critical minerals and rare earths

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			markets based on market-oriented policy and fair-trade practices.
10/26/25	White House Joint Statement on a Framework for a United States-Thailand Agreement on Reciprocal Trade	Economic Policy/Tariffs	The White House formally announced the framework for the trade deal between the U.S. and Thailand. According to the terms of the "Framework for an Agreement on Reciprocal Trade," Thailand will remove tariff barriers on approximately 99% of goods, and the U.S. will maintain the 19% reciprocal tariff rate on imports from Thailand. The U.S. will also identify products in Annex III to Executive Order 14346 to receive a 0% reciprocal tariff rate. The two countries will collaborate to address Thailand's non-tariff barriers impacting U.S. exports of certain product groups including automotives and pharmaceuticals. The announcement also emphasizes that Thailand will address and prevent barriers to U.S. food and agricultural products in the Thai market. In addition, both countries are set to finalize future commitments on the protection of labor rights, intellectual property, environmental protections, and digital trade measures.
10/23/25	Federal Register Notice of Determination and Request for Comments Concerning Action Pursuant to Section 301: Nicaragua's Acts, Policies, and Practices Related to Labor Rights, Human Rights and Fundamental Freedoms, and the Rule of Law	Tariffs	The USTR issued a determination pursuant to Section 301 of the Trade Act of 1974 regarding Nicaragua's acts, policies, and practices and their unreasonable and burdensome impacts on U.S. commerce. The USTR cites to the actions taken by the Ortega-Murillo regime that constitute human rights abuses and dismantle the rule of law in Nicaragua. Based on the USTR's findings, the agency recommends that the President take certain actions, including the imposition of up to 100% tariffs on

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			Nicaraguan imports, to address the identified concerns. The USTR has requested public comments be submitted on its proposed actions through November 19, 2025.
10/22/25	Office of Foreign Assets Control Press Release: Treasury Sanctions Major Russian Oil Companies, Calls on Moscow to Immediately Agree to Ceasefire	Economic Sanctions	The Office of Foreign Assets Control (OFAC) announced the imposition of new economic sanctions on key Russian oil firms and their subsidiaries in response to Russia's "lack of serious commitment to a peace process to end the war in Ukraine." Specifically, Russia's two largest oil companies, Open Joint Stock Company Rosneft Oil Company (Rosneft) and Lukoil OAO (Lukoil) have been listed on OFAC's Specially Designated Nationals (SDN) List pursuant to Executive Order 14024. The subsidiaries of Rosneft and Lukoil listed in Annex I of the OFAC press release, along with any entity owned 50% or more by Lukoil or Rosneft, are also subject to OFAC sanctions. OFAC also published new general licenses related to transactions involving sanctioned Russian parties. GL 124A permits certain transactions related to the Caspian Oil Pipeline Consortium or Tengizchevroil projects. GL 126 authorizes certain transactions related to the wind down of operations with Rosneft and Lukoil through November 21, 2025. GL 127 authorizes certain transactions involving Rosneft and Lukoil related to debt, equity, or derivative contracts through November 21, 2025. GL 128 permits certain transactions related to the maintenance, operation, or wind down of Lukoil retails service stations located outside of Russia through November 21, 2025.

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10/21/25	International Trade Administration Press Release: The Department of Commerce Announces American AI Exports Program Implementation	Exports	The International Trade Administration (ITA) announced the implementation of the American AI Exports Program that will involve the selection of AI export packages produced in the U.S. for promotion to foreign countries. The program implementation follows President Trump's executive order issued July 23, 2025, aimed at developing and promoting U.S. exports of AI technology stacks. On October 28, 2025, a request for information was published in the Federal Register inviting public comments on how to shape the program, related industry needs, and to ensure the policies behind the program are satisfied.
10/17/25	White House Adjusting Imports of Medium- and Heavy-Duty Vehicles, Medium- and Heavy-Duty Vehicle Parts, and Buses into the United States	Tariffs	Following an investigation and report under Section 232 of the Trade Expansion Act of 1962, President Trump issued a Presidential Proclamation to impose tariffs on imports of medium- and heavy-duty vehicles (MHDVs), parts, and buses. Beginning November 1, 2025, specified MHDVs and MHDV parts will be subject to a 25% tariff rate while buses and other vehicles classified under HTSUS heading 8702 will be subject to a 10% tariff rate. For USMCA-qualifying MHDVs, the 25% tariff will only apply to the non-U.S. content of the vehicle. Notably, U.S. manufacturers of MHDVs may seek an import adjustment offset equal to 3.75% of the aggregate value of all MHDVs annually assembled in the U.S. This import offset adjustment may be used to offset tariff liability related to that manufacturer's import of certain MHDV parts and will remain available until October 31,

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			2030. For more information see the White House Fact Sheet here.
9/30/25	Federal Register Expansion of End-User Controls to Cover Affiliates of Certain Listed Entities	Export Controls	The Bureau of Industry and Security (BIS) issued an interim final rule amending the Export Administration Regulations (EAR) to include new restrictions on exports to parties owned 50% or more by an entity listed on the BIS Military End-User (MEU) List or Entity List. This new rule mirrors the Office of Foreign Asset Control's (OFAC) application of economic sanctions and provides that parties ultimately owned 50% or more by an entity on the MEU or Entity List will be subject to the same export restrictions as its listed owners. In addition to the new rule, BIS has also added Red Flag #29 to Supplement No. 3 of Part 732 of the EAR directing that when an exporter has "knowledge" that a foreign entity has one or more listed owners or that are subject to other export restrictions, the exporter has an affirmative duty to determine the percentage of ownership of those entities or must obtain a license from BIS prior to export.
9/29/25	White House Adjusting Imports of Timber, Lumber, and Their Derivative Products into The United States	Tariffs/National Security	Following an investigation under Section 232 of the Trade Expansion Act of 1962, President Trump issued a Presidential Proclamation implementing tariff measures targeting imports of certain timber, lumber, and derivative products based on national security concerns. Certain imports of softwood timber and lumber identified in Annex I to the Proclamation will be subject to a 10% tariff rate. Imports of upholstered wooden products, kitchen cabinets, and vanities identified in Annex I to the

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			Proclamation will be subject to a 25% tariff rate. These initial tariff rates become effective October 14, 2025. Afterwards, the tariff rate for upholstered wooden products will increase to 30% and the tariff rate for kitchen cabinets and vanities will increase to 50% starting January 1, 2026. The Proclamation provides separate tariff rates for certain countries that have executed trade agreement frameworks with the U.S. including the European Union (15%), Japan (15%), and the United Kingdom (10%). For more information, visit the White House Fact Sheet here.
9/26/25	Federal Register Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Personal Protective Equipment, Medical Consumables, and Medical Equipment, Including Devices	Tariffs/National Security	The Department of Commerce initiated an investigation under Section 232 of the Trade Expansion Act of 1962 to determine the national security effects of imports of personal protective equipment (PPE), medical consumables, and medical equipment including devices. Interested parties are invited to submit comments addressing topics set forth in the FRN including the domestic demand for PPE, medical consumables, and medical equipment, including devices, whether U.S. production can meet this demand, the role of foreign supply chains in meeting U.S. demand for the subject medical products and the economic impact of artificially suppressed prices for the subject medical products due to foreign unfair trade practices and state sponsored overproduction. Interested parties must submit comments by October 17, 2025 for consideration. The investigation may lead to the implementation of additional tariffs on certain PPE,

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			medical consumables, and other medical device imports.
9/26/25	Federal Register Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Robotics and Industrial Machinery	Tariffs/National Security	The Department of Commerce initiated an investigation under Section 232 of the Trade Expansion Act of 1962 to determine the national security effects of imports of robotics and industrial machinery. Interested parties may submit comments for consideration in the investigation that focus on topics such as the domestic demand for robotics and industrial machinery in the U.S., whether U.S. production can meet this domestic demand, and the impact of foreign government subsidies and predatory trade practices on the competitiveness of the robotics and industrial machinery, and their parts and components, in the U.S. The deadline to submit comments in this investigation will be October 17, 2025. The investigation may lead to the implementation of additional tariffs on certain robotics and industrial machinery products that are imported into the U.S.
9/25/25	U.S. Court of Appeals for the Federal Circuit Case No. 23-1891 *HMTX Industries v. United States*	Tariffs	The Court of Appeals for the Federal Circuit (CAFC) issued an opinion in one of the leading cases challenging the validity of Section 301 tariffs implemented under the first Trump administration. The issues on appeal related to whether the USTR exceeded its statutory authority under Section 307 of the Trade Act of 1974 in modifying tariffs on a wide range of Chinese-origin goods (i.e., the List 3 and List 4a actions) after China retaliated against initial rounds of Section 301 tariffs implemented under List 1 and List 2. In addition, the CAFC considered whether the USTR took sufficient action to

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			consider public comments on the List 3 and 4a tariff modifications pursuant to the trial court's prior order. The validity of the List 1 and List 2 tariff actions were not challenged. The CAFC held that Section 307(a)(1)(C) of the Trade Act of 1974 independently authorized the USTR to implement the tariff modifications under List 3 and List 4a. The Court also found that the USTR's review of public comments and subsequent supply of information to the trial court "supplied the necessary clarification to meet the APA's [Administrative Procedure Act] requirements regarding notice-and-comment rulemaking." Therefore, the Court upheld the validity of the List 3 and List 4a Section 301 tariff actions targeting Chinese-origin imports.
9/25/25	Federal Register Implementing Certain Tariff-Related Elements of the U.S.-EU Framework on an Agreement on Reciprocal, Fair, and Balanced Trade	Tariffs	This FRN implements modifications to the HTSUS in line with the previously announced U.S.-EU framework agreement on trade. The HTSUS modifications formally implement tariff adjustments on certain EU-origin products including automobiles and automobile parts (15% total tariff rate), aircraft and aircraft parts (subject to exemptions from reciprocal tariffs and steel/aluminum tariffs), unavailable natural resources (including cork) (subject to exemption from reciprocal tariffs), generic pharmaceuticals and their ingredients and chemical precursors (subject to exemptions from reciprocal tariffs).
9/24/25	Federal Register	National Security	The Department of State announced the publication of the President's identification of the following

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	Presidential Determination on Major Drug Transit or Major Illicit Drug Producing Countries for Fiscal Year 2025		countries as major drug transit or production countries: Afghanistan, The Bahamas, Belize, Bolivia, Burma, the People's Republic of China (PRC), Colombia, Costa Rica, the Dominican Republic, Ecuador, El Salvador, Guatemala, Haiti, Honduras, India, Jamaica, Laos, Mexico, Nicaragua, Pakistan, Panama, Peru, and Venezuela. Five countries- Afghanistan, Bolivia, Burma, Colombia, and Venezuela- are listed as failing "demonstrably to make substantial efforts" over the past 12 months to make efforts to comply with counternarcotics agreements. As such, the President determined that providing U.S. "assistance" to these countries is "vital" to U.S. interests. All listed countries are called upon to better their counternarcotics efforts. The listed countries may face heightened scrutiny by U.S. regulatory authorities and in certain cases become subject to economic measures like tariffs or economic sanctions aimed at furthering the U.S.'s counternarcotics goals.
9/18/25	White House Memorandum of Understanding Between the Government of the United States of America and the Government of the United Kingdom of Great Britain and Northern Ireland Regarding the Technology Prosperity Deal	Economic Policy	The Trump administration announced a collaborative effort between the U.S. and the U.K. regarding joint opportunities in science and technology development, including acceleration of AI technology, unleashing civil nuclear energy, securing quantum advantage, and ensuring foundations for frontier research. This includes promoting U.S. and UK AI exports to offer the full stack of chips, data centers, and models; facilitating commercial partnerships while identifying and addressing market barriers to

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			accelerate the deployment of advanced nuclear reactors in both the U.S. and the UK; and securing 6G-related developments.
9/17/25	Federal Register Request for Comments on Significant Foreign Trade Barriers for the 2026 National Trade Estimate Report	Economic Policy	In preparation of its annual National Trade Estimate Report on Foreign Trade Barriers, the USTR invites interested parties to submit comments for consideration. The USTR directs that comments focus on one or more of the following trade barriers: import policies, technical barriers to trade, sanitary and phytosanitary measures, government procurement, intellectual property protection, services, investment restrictions, government subsidies, anticompetitive practices, state-owned enterprises, other non-market practices, labor, environmental factor, and other barriers. Commenters should also place particular emphasis on any practices that may violate U.S. trade agreements. Interested parties should submit their comments via the USTR comment portal by October 30, 2025.
9/17/25	Federal Register Request for Public Comments and Notice of Public Hearing Relating to the Operation of the Agreement Between the United States of America, the United Mexican States, and Canada	Economic Policy	The USTR has requested public comments on the United States-Mexico-Canada Agreement (USMCA) to aid it in developing positions and recommendations for the upcoming joint review between the 3 countries (occurring July 1, 2026). Comments may focus on any aspect of the operation or implementation of the USMCA, issues of compliance with USMCA provisions, recommendations for specific actions that USTR should propose to promote balanced trade, new market access, and alignment on economic security with Mexico and Canada, factors affecting the

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			investment climate in North America and in the territories of each Party, the effectiveness of the USMCA in promoting investment that strengthens U.S. competitiveness, productivity, and technological leadership, and strategies for strengthening North American economic security and competitiveness. Interested parties may submit comments via the USTR comment portal up to November 3, 2025. Written comments are due on November 3, 2025. Interested parties may also participate in a public hearing hosted by the USTR on November 17, 2025, in Washington D.C.
9/16/25	Federal Register Request for Comments on Whether Particular Exclusions in the Section 301 Investigation of China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation Warrant Further Extension	Tariffs	The USTR opened a public comment period for interested parties to submit comments on whether current product exclusions from Section 301 tariffs on Chinese-origin imports warrant further extension past November 29, 2025. Interested parties must submit comments by 11:59pm ET on October 16, 2025. The USTR has requested that comments focus specifically on the availability of products covered by the exclusions from sources outside of China, efforts undertaken to source products covered by the exclusions from the United States or third countries, why additional time is needed to shift products of subject products away from China, and whether further extending the exclusion will likely contribute to a shift in sourcing the product outside of China. Additional considerations include the impact on the administration's priorities, U.S. interests, and the impact on the goal of the Section 301 investigation.

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9/9/25	Supreme Court Case Nos. 24-1287 & 25-250 *Learning Resources, Inc., Et Al. v. Trump* & *V.O.S. Selections, Inc. v. Trump*	Tariffs	The Supreme Court has granted petitions for an expedited review of two of the leading cases challenging the validity of President Trump's IEEPA tariff actions. The order consolidates the two cases and sets a briefing schedule starting with opening briefs due on September 19, 2025. The cases will be set for oral argument in the first week of November.
9/5/25	White House Modifying the Scope of Reciprocal Tariffs and Establishing Procedures for Implementing Trade and Security Agreements	Tariffs	President Trump issued an executive order modifying reciprocal tariffs originally set forth in Executive Order 14257. The order provides a revised Annex II list of products excluded from reciprocal tariffs. Certain critical mineral, pharmaceuticals, and bullion-related products have been added to Annex II and will no longer be subject to reciprocal tariffs beginning September 8, 2025. Other products, including certain aluminum hydroxide, resin, and silicone products have been removed from Annex II and will be subject to reciprocal tariffs beginning on September 8, 2025. In addition, the executive order sets forth a framework for implementing existing and future trade agreements stating that the administration will generally refrain from modifying reciprocal and section 232 tariff rates before the conclusion of a final trade and security agreements between another country and the U.S. A list of products the administration is willing to provide a 0% reciprocal tariff rate for under trade agreements are set forth in Annex III to the order ("Potential Tariff Adjustments for Aligned Partners")

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			and include agricultural goods, aircraft and aircraft parts, non-patented articles for use in pharmaceutical applications, and goods that cannot be naturally grown or mined in the U.S. For more information, visit the White House Fact Sheet here.
9/5/25	White House Strengthening Efforts to Protect U.S. Nationals from Wrongful Detention Abroad	National Security/Foreign Policy	President Trump issued an executive order focused on protecting U.S. nationals from wrongful detention abroad. Through this order, the Secretary of State ("the Secretary") may designate countries that directly engage in or support wrongful detention as State Sponsors of Wrongful Detention. The designation will be based on certain criteria including a country's deemed wrongful detention of a U.S. national, a foreign government's failure to release a person after being notified by the U.S. that the Secretary has deemed that person wrongfully detained, and a foreign government's support or complicity in furthering unlawful detentions. The Secretary may take several actions against such designated countries, including imposing sanctions, imposing travel restrictions, restricting assistance to the government of that nation, and restricting the export of certain goods to that country.
9/4/25	White House Implementing the United States–Japan Agreement	Tariffs	President Trump issued an executive order implementing the trade framework agreement with Japan that was previously announced on July 22, 2025. The executive order implements a 15% baseline tariff on nearly all Japanese imports, including automobiles and automobile parts. Like the tariff structure for EU-

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			origin products outlined in Executive Order 14326, the tariff rate for most Japanese-origin products will be capped at 15% (i.e., the sum of the Column 1 duty rate under the HTSUS and the additional *ad valorem* tariff pursuant to this order will be 15%). Importantly, the 15% tariff rate applies retroactively to Japanese imports entered on or after August 7, 2025. The executive order also provides that Japanese-origin aircraft products, except for unmanned aircraft, falling under the WTO Agreement on Trade in Civil Aircraft will be excepted from the IEEPA reciprocal tariffs, Section 232 steel and aluminum tariffs, and Section 232 tariffs on copper products. In addition, the order authorizes the Secretary of Commerce to take steps in the future to eliminate reciprocal tariffs on Japanese-origin generic pharmaceuticals, pharmaceutical ingredients, pharmaceutical chemical precursors, and natural resources unavailable in the United States.
9/2/25	Federal Register Relaxing Export Controls for Syria	National Security/Export Controls	Consistent with the administration's relaxing of trade restrictions on Syria, the Bureau of Industry and Security (BIS) has implemented changes to export control measures related to Syria listed in section 746.9 of the EAR. Since 2013, most items subject to the EAR (including EAR99 items) were restricted from export to Syria. BIS's final rule adds new or expanded license exception eligibility for exports and reexports to Syria and adopts more permissive license review policies for exports and reexports to Syria

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			(which were previously subject to a presumption of denial).
9/2/25	Federal Register Notice of Product Exclusion Extensions: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation	Tariffs	The United States Trade Representative (USTR) announced the extension of exclusions from Section 301 tariffs for certain products from China through November 29, 2025. The exclusions were previously set to expire on August 31, 2025, pursuant to a prior exclusion extension announcement issued on May 31, 2025. Under the Section 301 action related to China, most Chinese-origin imports are subject to an additional tariff ranging from 7.5%-100%.
9/2/25	USTR Public Hearing Regarding Section 301 Investigation into Certain Acts, Policies, and Practices of Brazil	National Security/Economic Policy	The USTR announced a public hearing on September 3, 2025, for the Section 301 investigation of Brazil's acts, policies, and practices related to digital trade and electronic payment services; unfair, preferential tariffs; anti-corruption enforcement; intellectual property protection; ethanol market access; and illegal deforestation. The hearing took place in Washington, D.C., and a full transcript of the hearing will be posted on ustr.gov.
8/29/25	Department of Justice Departments of Justice and Homeland Security Partnering on Cross-Agency Trade Fraud Task Force	Enforcement	The DOJ announced its implementation of a Trade Fraud Task Force to pursue enforcement actions against parties that seek to evade U.S. tariffs and import duties and that engage in smuggling activities.* The Task Force will involve personnel from the DOJ's Civil and Criminal divisions as well as the Department of Homeland Security (DHS). The Task Force will focus on investigating and prosecuting violations of U.S. customs laws and may pursue civil actions under the Tariff Act of 1930

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			or False Claims Act (FCA) as well as criminal actions under federal statutes. *A Trade Fraud Task Force previously existed under the Biden Administration and was involved in several customs-related enforcement actions including the Ford Motor Company settlement announced on March 11, 2024.
8/29/25	United States Court of Appeals for the Federal Circuit Case No. 25-1812 *V.O.S. Selections, Inc. v. Trump*	Tariffs	On August 29, 2025, the Court of Appeals for the Federal Circuit (CAFC) issued a decision in one of the leading cases challenging the validity of President Trump's tariffs. The CAFC affirmed the Court of International Trade's (CIT) previous decision finding that the President's reciprocal and fentanyl tariff actions exceeded his authority under the International Emergency Economic Powers Act (IEEPA). The CAFC has remanded the case back to the CIT to decide whether a nationwide injunction of the tariff actions is lawful and whether only parties to the case (as opposed to all importers) may receive refunds for tariff payments. The CAFC paused any action to be taken pursuant to its invalidation of the tariffs until October 14, 2025. Therefore, tariffs under the subject actions will continue to be collected by CBP. On September 3, 2025, the government submitted a petition to the Supreme Court requesting expedited review of the case. As such, it is possible for the tariff actions to remain in effect even after the CAFC's October 14 deadline.
8/27/25	Federal Register	Export Controls	The Department of State issued a final rule amending the International Traffic in Arms

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			Regulations (ITAR) removing certain items from the U.S. Munitions List (USML), adding new items to the USML, clarifying certain USML entries, and adding a new license exemption for certain activities related to unmanned underwater vehicles. The updates span over 15 of the 21 USML categories and include additional controls on certain equipment for improvised explosive devices, production equipment for specified aircraft, engines for newly listed aircraft models, and materials for nerve agents. Notably, the new additions to the USML outpace the number of items removed from the USML highlighting a shift toward greater ITAR controls. The new rule becomes effective on September 15, 2025.
8/25/25	Federal Register Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Wind Turbines and Their Parts and Components	Economic Policy/Tariffs	On August 13, 2025, the Secretary of Commerce initiated an investigation under Section 232 of the Trade Expansion Act of 1962 to determine the national security impact of imports of wind turbines and their parts and components. Interested parties may submit comments to the Department of Commerce Bureau of Industry and Security (BIS) for consideration in the investigation. The deadline to submit comments is September 9, 2025. This investigation may result in the implementation of new tariffs on wind turbine products from all countries.
8/21/25	White House Joint Statement on a United States-European Union Framework on an Agreement on	Economic Policy/Tariffs	The U.S. and EU announced a framework agreement on trade relations that sets forth tariff rate expectations and terms to be considered by the two countries in future negotiations. The framework agreement states the U.S. will apply

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	Reciprocal, Fair, and Balanced Trade		the higher of the U.S. Most Favored Nation (MFN) rate or a 15% tariff rate on most EU-origin imports. Additionally, the U.S. will only apply the MFN tariff rate to certain unavailable natural resources, aircraft and aircraft parts, and pharmaceutical products. In addition, EU-origin products that are subject to certain Section 232 tariffs including pharmaceuticals, lumber, semiconductors, and automobiles, will be subject to a 15% total tariff rate. The framework suggests that the two countries will engage in future negotiations regarding additional products that are or may become subject to Section 232 tariffs including steel, aluminum, and derivative products.
8/19/25	USTR Forced Labor Enforcement Task Force Release of the 2025 Update to the UFLPA Strategy	Forced Labor	The United States Trade Representative (USTR) published annual updates to the "Strategy to Prevent the Importation of Goods Mined, Produced, or Manufactured with Forced Labor in the People's Republic of China." This strategy details the inter-agency efforts to support and pursue enforcement of the Uyghur Forced Labor Prevention Act (UFLPA). The 2025 updates highlight the addition of 78 new entities to the UFLPA Entity List since 2024, effectively expanding the number of Chinese parties whose goods are subject to the forced labor rebuttable presumption and prohibited from entry into the U.S. In addition, the updates highlight new priority sectors for forced labor enforcement including in steel, copper, and lithium industries.
8/19/25	White House	Export Controls	The White House announced the signing of Congressional Bill H.R.

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	Congressional Bill H.R. 1316 Signed into Law		1316 (Maintaining American Superiority by Improving Export Control Transparency Act) into law. The Act amends the Export Control Reform Act of 2018 to require the Secretary of Commerce to report annually to Congress on license applications received for the export of dual-use items.
8/15/25	White House The Office of Federal Procurement Policy Launches Landmark Update to FAR, Ushering in a New Era for Commercial Buying	Economic Policy	On August 15, 2025, the Office of Management and Budget's Office of Federal Procurement Policy launched an update to the Federal Acquisition Regulation (FAR) in pursuance of the Revolutionary FAR Overhaul (RFO), which is meant to return the FAR to its statutory roots. This action authorizes agencies to immediately begin deleting one-third of requirements from their future contracts not required by statute or executive orders and having little to do with contract outcomes in order to better leverage commercially-available solutions. The Office of Federal Procurement Policy (OFPP) and the FAR Council are releasing the FAR Companion Guide, Practitioner's Albums, and Category Guide to provide tips and tools regarding the FAR. OFPP is now also directing agencies to use government-wide contracts for common commercial products and services including "best-in-class" and "preferred" contracts, rather than maintaining their own contracts, and OFPP will create the criteria to qualify contracts as "best-in-class" for mandatory use. OFPP also has eliminated outdated procedures and consolidated key procedures under a modernized FAR Part 8, retired FAR parts 38 and 51, centralized information and

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			supply chain security policies into a single FAR part, and imposed changes to make sign up and maintenance of registration easier for contractors.
8/13/25	White House Enabling Competition in the Commercial Space Industry	National Security	President Trump issued an executive order to enhance America's space industry by streamlining commercial license and permit approval processes for U.S. operators. It directs the Secretary of Transportation to use all available authorities to eliminate and expedite the Department of Transportation's environmental reviews and other obstacles to the granting of launch and reentry licenses and permits. The Secretary of Transportation will reevaluate, amend, or rescind the regulations at Part 450 of title 14, Code of Federal Regulations as appropriate and will report a description of actions taken within 120 days of this order. The Secretary of Defense, the Secretary of the Interior, the Secretary of Transportation, and the Administrator of NASA will also expedite environmental and administrative review activity relevant to spaceport infrastructure development. The Chair of the Council on Environmental Quality will also establish new categorical exclusions under the National Environmental Policy Act (NEPA) for spaceport development actions that do not typically have a significant effect on the quality of the human environment. Additionally, the Secretary of Commerce will propose a process for individualized mission authorizations for activities covered by Article VI of the Outer Space Treaty of 1967. The Secretary of

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			Transportation will create a position in the Office of the Secretary to advise the Secretary of Transportation on fostering innovation and deregulation in the commercial space transportation industry.
8/13/25	White House Ensuring American Pharmaceutical Supply Chain Resilience by Filling the Strategic Active Pharmaceutical Ingredients Reserve	Economic Policy/National Security	President Trump issued an executive order focused on restocking the domestic reserve of Active Pharmaceutical Ingredients (APIs). It directs the Office of the Assistant Secretary for Preparedness and Response (ASPR) to develop a list of approximately 26 drugs critical to national health and security (the "critical drugs") and an accounting of funds that can be used to prepare and open the Strategic Active Pharmaceutical Ingredients Reserve (SAPIR) within 30 days. The order also directs the ASPR to obtain and maintain a six-month supply of the critical drugs. Within 120 days, ASPR should ready the existing SAPIR repository to be able to receive and maintain APIs, and ASPR will obtain the six-month supply of APIs when the funds are available and place them in the repository no later than 30 days after the repository is ready. Within 90 days, the ASPR will provide certain offices and officials with an update to 2022 list of 86 essential medicines and medical countermeasures and a plan to obtain (from domestic manufacturing when possible), store, and maintain a six-month supply of APIs for the updated medicine list when necessary. The plan should also include a cost estimate and a proposal for a

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			second SAPIR repository within a year.
8/11/25	White House Further Modifying Reciprocal Tariff Rates to Reflect Ongoing Discussions with the People's Republic of China	Economic Policy/Tariffs	President Trump issued an executive order extending the suspension of heightened tariffs on Chinese-origin imports. The Order states that the continuing pause on the heightened tariffs is due to China's ongoing participation in trade negotiations with the U.S. during which China has taken "significant steps" to remedy economic and national security concerns of the U.S. Pursuant to this Order, the reciprocal tariff rate for Chinese-origin imports will remain at 10% until November 10, 2025. For more information, visit the White House Fact Sheet here.
8/6/25	White House Addressing Threats to the United States by the Government of the Russian Federation	Economic Policy/Tariffs	President Trump issued an executive order implementing a 25% tariff on Indian-origin imports to go into effect on August 27, 2025. The new tariff is a response to India's continued importation of Russian oil, both directly and indirectly. The order cites the Russia-Ukraine conflict as the source of concern and emphasizes the continued threat Russia poses to U.S. national security and foreign policy objectives. The 25% tariff on Indian-origin products imposed under this order will stack with the other applicable duties, unless the subject products are subject to tariffs under Section 232 of the Trade Expansion Act (e.g., product-specific tariffs on automobiles, auto parts, steel and aluminum, and copper, etc.) in which case the 25% additional tariff will not apply. The Secretary of State will recommend additional necessary action to be taken in response to any retaliation from Russia or other countries. The

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			Secretary of Commerce will lead continuous monitoring efforts to determine whether other countries are similarly importing Russian oil and recommend imposition of a 25% tariff on articles of such countries. A White House Fact Sheet on this topic is available here.
8/4/25	White House President Trump Demands America First Prescription Drug Pricing	Economic Policy	President Trump has released more information on the demands the administration has for pharmaceutical companies and the subsequent letters sent to the 17 leading pharmaceutical companies. This follows the fact sheet here outlining the President's plan to bring down prescription drug prices for American consumers to match the lowest price offered in other developed countries (the most-favored-nation or MFN price). The letters outline demands to complete in 60 days, including lowering drug prices to match MFN pricing, raising prices internationally, and reinvesting any increased revenue into lowering prices for American consumers. The letters ask for binding commitments by the recipient countries to align with the administration's prescription drug pricing goals by September 29, 2025.
7/31/25	U.S. Court of Appeals for the Federal Circuit Case No. 25-1812 *V.O.S. Selections, Inc. v. Trump*	Tariffs	On July 31, 2025, the U.S. Court of Appeals for the Federal Circuit heard oral arguments in one of the major cases challenging the validity of President Trump's tariff actions under IEEPA. This case is currently on appeal following a decision by the Court of International Trade (CIT) to enjoin the tariff actions. The government quickly appealed the CIT's decision and requested a stay to halt the enjoinment of the tariffs while the appeal is pending.

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			The Court of Appeals is expected to issue a decision in this case in the coming weeks which is likely to be followed by an appeal and eventual escalation to the U.S. Supreme Court.
7/31/25	White House Amendment to Duties to Address the Flow of Illicit Drugs Across Our Northern Border	Economic Policy/Tariffs	President Trump issued an executive order increasing duties on Canadian-origin imports initially imposed under Executive Order 14193 of February 1, 2025, to address the declared national emergency related to fentanyl trafficking and other criminal activity along the U.S.-Canadian border. The order raises the tariff rate for most Canadian-origin products from 25% to 35%, while specified Canadian-origin energy products remain subject to a 10% tariff rate. The order cites several reasons for the tariff increase including Canada's failure to cooperate with efforts to stem the flow of fentanyl across the northern border, it's failure to adequately devote resources to address drug trafficking and other criminal activity, and Canada's implementation of retaliatory measures against the U.S. following the President's tariff actions. Any goods transshipped to evade the application of duties under this order will be subject to a 40% tariff rate in addition to other applicable duties, fines, or penalties. The increased tariff rates under this order will go into effect on August 1, 2025. For more information, see the White House Fact Sheet on this topic here.
7/31/25	White House Further Modifying the Reciprocal Tariff Rates	Economic Policy/Tariffs	President Trump issued an executive order revising reciprocal tariff rates first announced on April 2, Liberation Day. Annex I of the

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			order provides country-specific tariff rates that go into effect August 7, 2025. Notably, EU-origin products will only face up to a 15% total tariff rate under the new order. Other countries listed in Annex I will be subject to additional tariff rates ranging from 10%- 41%. Countries not listed in Annex I of the order remain subject to a baseline 10% tariff rate. Importantly, this order does not modify the reciprocal tariff rate for Chinese-origin goods set forth in E.O. 14298 from May 12, 2025. Items determined by CBP to be transshipped through third countries to avoid application of tariffs will face an additional 40% tariff as well other applicable duties and appropriate fines or penalties. CBP will not permit mitigation or remission of the penalties. The Secretaries of Homeland Security and Commerce through the Commissioner of CBP will issue a list of countries and facilities used in circumvention schemes and update this list every 6 months to assist with commercial due diligence efforts.
7/30/25	White House Addressing Threats to The United States by The Government of Brazil	Economic Policy/Tariffs	President Trump issued an executive order raising the tariff rate on Brazil to a total of 50% starting August 7. The order cites the trial of former Brazilian president Bolsonaro as a cause, calling it unjust political persecution. The order also cites the treatment of U.S. online platforms as a cause, stating that actions by Brazilian officials facilitate persecution of political critics and censorship of U.S. persons. The order specifically brings up Judge Alexandre de Moraes as an

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			authority figure abusing his power in Brazil. The order states that the rate will be raised should Brazil retaliate. The tariff will stack and won't apply to imports excepted by 50 U.S.C. 1702(b) or set forth in Annex I to this order including precious metals and civil aircraft and its parts and components. For more information, visit here.
7/30/25	White House Suspending Duty Free De Minimis Treatment for All Countries	Economic Policy/Tariffs	President Trump issued an executive order revising previous executive orders on the suspension of *de minimis* treatment for imports from Canada, Mexico, and China and suspending *de minimis* treatment for imports from all foreign countries. Effective August 29, 2025, all shipments, even those that would have previously qualified for duty-free *de minimis* treatment will be subject to a tariff equal to the IEEPA tariff rate (reciprocal tariff) applicable to items originating from the respective country. For 6 months after the implementation of the *de minimis* suspension, items shipped via the international postal system may alternatively be subject to specific duty rates based on the country of origin of the subject items. Under this method, a package shipped from a country with an IEEPA duty rate of less than 16% will be subject to an $80 duty per item, a package shipped from a country with an IEEPA duty rate between 16-25% will be subject to a $160 duty per item, and a package shipped from a country with an IEEPA duty rate above 25% will be subject to a $200 duty per item. After 6 months, all items will be subject to the IEEPA tariff

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			rate associated with the subject country of origin.
7/30/25	White House Adjusting Imports of Copper Into the United States	Economic Policy/Tariffs	The White House has issued a proclamation implementing tariffs on copper imports. This follows a Section 232 investigation and report on the impacts of imports of all copper, which found that such imports and its quantities impact national security and weaken the U.S. economy and domestic production. Semi-finished copper and intensive copper imports will face a 50% tariff rate when being imported to the U.S. This tariff rate goes into effect on August 1 and will stack. The Secretary of Commerce ("the Secretary") will determine if modifications to the HTSUS are necessary and within 90 days will create an inclusion process for additional copper derivatives. This tariff will only apply to the copper content in an import, and non-copper content will instead face tariffs it would normally be subject to. The CBP will issue authoritative guidance to mandate strict compliance with declaration requirements for copper content. This guidance will also outline the maximum penalties for noncompliance, which can include criminal liability, loss of import privileges, and large monetary penalties. The proclamation notes that importers with underreported declarations may face severe consequences. Imports subject to both this tariff and the tariff on automobiles and auto parts will only be subject to the tariffs on automobiles and auto parts. Additionally, the Secretary will implement the domestic sales requirements for copper input

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			materials and high-quality copper scrap material that the Secretary recommended in the report.
7/28/25	White House Fact Sheet: The United States and European Union Reach Massive Trade Deal	Economic Policy/Tariffs	The White House issued a statement on the details of the U.S.-EU trade deal. Under the agreement, the EU will be subject to a 15% tariff rate, including on certain products covered by Section 232 tariffs like semiconductors, pharmaceuticals, automobiles, and auto parts. The White House statement also provides that the EU is to invest in certain U.S. industries and negotiate with the U.S. to secure supply chains for other products covered by Section 232 tariffs including copper and derivative products. The EU is set to address U.S. concerns over access to certain UK markets by reducing non-tariff barriers impacting U.S. industrial and agricultural exports. The U.S. and the E.U. will work together to strengthen national security to protect supply chains, establish strong rules of origin to address transshipping concerns, and to address unjustified digital service barriers. In regards to digital trade, the White House statement indicates that the EU will not adopt or maintain network usage fees, and neither country will impose duties on electronic transmissions. Notably, this agreement is not final and must be approved by EU member states.
7/23/25	White House Promoting The Export of The American AI Technology Stack	Economic Policy	President Trump issued an executive order focused on supporting the development and deployment of American full-stack AI support packages by directing the Secretary of Commerce to establish and implement the

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			American AI Exports Program (Program) within 90 days. Commerce will issue a public call for proposals from industry groups for inclusion in the program. Each proposal is required to include a full-stack AI technology package, identification of target regions for export, a description of the business and operation plan for the AI data centers and associated infrastructure, and certification of compliance with U.S. export control and outbound investment laws. Additionally, the Economic Diplomacy Action Group (EDAG) will mobilize federal financing tools to support the prioritization of AI export packages. The Secretary of State, in consultation with EDAG, will also be responsible for activities to aid in the advancement of U.S. AI exports including by developing and executing a unified federal strategy on AI exports and reviewing market access and trade barriers that may impact U.S. exports.
7/23/25	White House Fact Sheet: President Donald J. Trump Secures Unprecedented U.S.–Japan Strategic Trade and Investment Agreement	Economic Policy/Tariffs	Following an announcement by President Trump, the White House issued a Fact Sheet providing an overview of key aspects of a new trade agreement reached between the U.S. and Japan. Under this agreement, imports of Japanese-origin products will be subject to a "baseline" 15% tariff rate. The Fact Sheet states that Japan will invest $550 billion to help with the rebuilding and expansion of key American industry sectors including in the energy infrastructure, semiconductor manufacturing and research, pharmaceutical and medical production, shipbuilding, and

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			critical mineral mining, processing, and refining. The framework also provides that Japan will increase its purchase and import of certain U.S.-origin products including rice, corn, soybeans, energy products, commercial aircraft and defense equipment, ant automobiles.
7/22/25	White House Joint Statement on Framework for United States-Indonesia Agreement on Reciprocal Trade	Economic Policy/Tariffs	The White House issued a formal statement announcing a new preliminary trade agreement between the U.S. and Indonesia. The announcement provides an overview of the "Framework" the two countries have agreed upon to serve as the foundation for future negotiations and trade relations. Importantly, the Framework provides that imports of Indonesian-origin products into the U.S. will be subject to a 19% tariff rate that may be further reduced for certain commodities not naturally available in the U.S. Indonesia is also set to eliminate "approximately 99 percent of tariff barriers" that impact a wide-range of U.S. exports. Indonesia and the U.S. will continue to work together to further decrease non-tariff trade barriers in Indonesia that impact bilateral trade and investment between the two countries such as Indonesian. These efforts may include amending Indonesian requirements related to local content standards for imports, motor vehicle safety and emissions standards, labeling requirements, and pharmaceutical marketing authorization requirements. The Framework also states that Indonesia will work to address concerns related to intellectual property protections detailed in the USTR's Special 301 Report. Other key areas addressed in the

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			Framework include the lowering of Indonesian barriers to digital trade, services, and investment; the strengthening of environmental protections and labor rights in Indonesia; and the removal of Indonesian restrictions impacting U.S. exports of industrial products and critical minerals. To see the accompanying White House Fact Sheet on this topic, visit here.
7/16/25	Federal Register Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Polysilicon and its Derivatives	National Security/Economic Policy	The Department of Commerce has issued a notice of request for public comments on the Section 232 investigation into the national security impacts of imports of polysilicon and derivative products. This investigation was initiated on July 1, 2025, pursuant to Section 232 of the Trade Expansion Act of 1962. Commerce is seeking public comments on a variety of topics related to polysilicon imports including the current and projected demand in the U.S. for these products, domestic production capacities, the role of foreign supply chains in meeting U.S. demand, the concentration of U.S. imports from a small number of polysilicon suppliers and associated risks, and the impact of predatory trade practices and foreign government subsidies on competition. Interested parties may now submit comments to BIS's Office of Strategic Industries and Economic Security for consideration until August 6, 2025.
7/16/25	Federal Register Section 232 National Security Investigation of Imports of Unmanned Aircraft Systems and	National Security/Economic Policy	The Department of Commerce has issued a notice of request for public comments on the Section 232 investigation into imports of unmanned aircraft systems (UAS) and their parts and components. This investigation was initiated on

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	Their Parts and Components		July 1, 2025, pursuant to Section 232 of the Trade Expansion Act of 1962 to determine the effects of such imports on U.S. national security. This investigation follows President Trump's June 6 Executive Order directing relevant departments to take actions to assist with the promotion of the U.S. drone industry. Commerce seeks commentary on a variety of topics related to UAS imports including the current and projected demand in the U.S., domestic production capacities for UAS, the role of foreign supply chains in meeting U.S. demand, the concentration of U.S. imports from a small number of suppliers or foreign nations and associated risks, the feasibility of increasing domestic production capacity for UAS, the impact of predatory trade practices and foreign government subsidies on trade competition, and the impact of current domestic policies on domestic UAS production. Interested parties have until August 6, 2025, to submit their comments to BIS's Office of Strategic Industries and Economic for consideration.
7/15/25	Federal Register Initiation of Section 301 Investigation: Brazil's Acts, Policies, and Practices Related to Digital Trade and Electronic Payment Services; Unfair, Preferential Tariffs; Anti-Corruption Enforcement; Intellectual Property Protection; Ethanol Market Access; and	Economic Policy	The USTR has announced a Section 301 investigation, following President Trump's direction, of the acts, policies, and practices of Brazil in relation to digital trade and electronic payment services undermining the competitiveness of U.S. companies, preferential tariffs leading to unfair treatment of U.S. exports to Brazil, IP protections, the anti-corruption enforcement, ethanol market policies that disadvantage the U.S., and illegal deforestation impacting U.S.

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	Illegal Deforestation; Hearing; and Request for Public Comments		lumber exports. Interested parties are invited to submit comments on the topics listed above to the USTR for consideration by August 18, 2025. At the conclusion of the USTR's investigation, which includes consideration of public comments and completion of public hearing procedures, the USTR may determine that certain actions, such as the implementation of additional tariffs, must be taken to address the negative impacts of Brazil's acts, policies, and practices.
7/9/25	Federal Register Publication of Global Terrorism Sanctions Regulations and Foreign Terrorist Organizations Sanctions Regulations Web General Licenses 22A, 23A, 24A, 25A, 26A, and 28A	U.S. Economic Sanctions	OFAC has published a list of General Licenses (GLs) regarding transactions involving Ansarallah (otherwise known as the Houthis), which has been designated as a foreign terrorist organization since January 22, 2025. Several GLs are detailed and provide authorization for transactions involving the following: agriculture, medical care, technology, communication, personal and noncommercial remittances, refined petroleum, necessary airport and port operations, and third party diplomatic and consular missions. Outside of these authorizations, such transactions are prohibited by the Foreign Terrorist Organizations Sanctions Regulations and the Global Terrorism Sanctions Regulations. Financial transfers involving Ansarallah, or any entity in which Ansarallah owns, directly or indirectly, a 50% or greater interest, remain prohibited.
7/7/25	White House Extending The Modification of the Reciprocal Tariff Rates	Tariffs	President Trump issued an Executive Order delaying the date country-specific tariff rates are to go into effect until August 1, 2025. The country-specific tariff rates originally announced on April 2,

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			2025, were previously delayed for 90 days and set to go into effect on July 9, 2025, under Executive Order 14266 ("Modifying Reciprocal Tariff Rates to Reflect Trading Partner Retaliation and Alignment"). Under this most recent Order, a 10% baseline reciprocal tariff rate will remain in place for all countries other than China until August 1, 2025, when specific rates are implemented. This Order does not impact the 10% reciprocal tariff on China which remains in effect under Executive Order 14298 until August 12, 2025, or the 20% tariff on Chinese goods implemented in response to China's synthetic opioid supply chain. In the meantime, the President is issuing letters to countries previewing what their tariff rate will become on August 1. For more information, visit the White House Fact Sheet here.
7/1/25	Federal Register International Criminal Court-Related Sanctions Regulations	U.S. Economic Sanctions	OFAC has issued regulations to implement the International Criminal Court-Related sanctions authorized under Executive Order 14203 issued on February 6, 2025. The regulations formalize restrictions on parties connected to the ICC that are identified as blocked parties on OFAC's Specially Designated Nationals (SDN) List. Importantly, the regulations incorporate 6 previously issued general licenses (GLs) authorizing the provision of certain legal services, receipt of payments for legal services, provision of emergency medical services, collection of account service charges, transactions related to the provision of agricultural commodities, medicine, medical

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			devices and certain non-commercial software updates, as well as U.S. government business dealings involving individuals or entities blocked pursuant to E.O. 14203.
6/30/25	White House National Security Presidential Memorandum/NSPM-5	U.S. Economic Sanctions	President Trump issued a Memorandum continuing restrictive policies toward Cuba that were implemented under a similar memorandum during his first administration and mostly maintained throughout the Biden Administration. The policy objectives include ending economic practices that disproportionately benefit the Cuban government at the expense of its people and supporting the economic embargo against the nation. Notably, the new Memorandum orders the Secretary of State to publish a list of entities controlled by or acting on behalf of the Cuban government with which direct *and indirect* financial transactions would be prohibited. The Memorandum also directs the Secretaries of Commerce, State, and Transportation to initiate a process to adjust current regulations related to transactions with Cuba within 30 days.
6/30/25	White House Providing For the Revocation of Syria Sanctions	U.S. Economic Sanctions	President Trump issued an executive order revoking the declared national emergency regarding Syria and the related sanctions imposed under 6 executive orders issued between 2004-2011. To implement this E.O., OFAC has removed 518 previously sanctioned parties from its Specially Designated Nationals (SDN) List. As such, a wide range of previously prohibited transactions with Syrian parties are now permissible. The E.O. Maintains sanctions against the

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			Bashar al-Assad regime and associated parties that undermine the peace and security of Syria. The order also authorizes the Secretary of State to sanction foreign individuals, and their adult family members, who harm or attempt to harm or prevent efforts to promote a stable, unified, and peaceful Syria. In addition, certain remaining sanctions provisions, such as those enacted under the Ceasar Act, require congressional action to be removed or modified. Accordingly, the E.O. directs relevant agencies to review and submit briefings to appropriate congressional committees as necessary to suspend these measures.
6/20/25	Supreme Court Order No. 24-1287 *Learning Resources, Inc., Et Al. v. Trump, President of U.S., Et Al.*	Tariffs	The U.S. Supreme Court has issued an Order denying the Petitioner's request for an expedited review of a case challenging President Trump's implementation of tariffs under the International Emergency Economic Powers Act (IEEPA). As a result, the subject case will proceed through the typical appeals process and will not be immediately heard by the Supreme Court.
6/16/25	White House Implementing The General Terms of The United States of America-United Kingdom Economic Prosperity Deal	Economic Policy/Tariffs	President Trump issued an executive order to implement terms from the U.S.-UK trade deal originally announced on May 8, 2025. The Order establishes an annual tariff-rate quota of 100,000 automobiles to enter from the UK with a combined tariff rate of 10%. Automobiles imported in excess of this quota will be subject to the full Proclamation 10908 tariffs (25%). In addition, certain automative parts that are UK-origin, and for use in UK-origin vehicles will be subject to a combined 10% tariff rate. UK-

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			origin aerospace products that fall under the WTO Agreement on Trade in Civil Aircraft will not be subject to tariffs from (all as amended) E.O. 14257, Proclamation 9704, and Proclamation 9705. No tariff scheme has currently been set for steel and aluminum (and the derivatives), but the Order authorizes the Secretary of Commerce to develop a tariff rate quota for these products in consultation with the USTR. For more information visit here.
6/13/25	White House Regarding The Proposed Acquisition of United States Steel Corporation by Nippon Steel Corporation	National Security/Economic Policy	President Trump has issued an executive order on the Nippon Steel acquisition of United States Steel Corporation following a review by the Committee on Foreign Investment in the United States (CFIUS), which found that the deal could pose threats to U.S. national security. President Biden issued a prior Executive Order on January 3, 2025, prohibiting the subject acquisition. President Trump has now modified the prior Order to allow the subject transaction to proceed contingent on the involved parties executing a National Security Agreement (NSA) with the Department of the Treasury, as well as other necessary CFIUS member agencies. Until the NSA has been executed or both parties abandon the transaction, CFIUS is to monitor the proposed transaction and to act as necessary to protect U.S. national security. While there has been no official statement, public sources indicate that the parties involved plan to move forward with the deal.
6/12/25	Federal Register	National Security/Marit	The USTR issued a Notice detailing proposed modifications to actions

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	Notice of Proposed Modification of Action in Section 301 Investigation of China's Targeting the Maritime, Logistics, and Shipbuilding Sectors for Dominance	ime and Logistics	originally announced on April 17, 2025, pursuant to the USTR's investigation into China's targeting of the maritime, logistics, and shipbuilding sectors. The proposed modifications include a change in the fee basis under Annex III for certain vessels to net tons and eliminating the term providing for the suspension of export licenses set forth in Annex IV. Importantly, the USTR has requested public comments on these proposed modifications. Interested parties may submit comments to the USTR for consideration up to July 7, 2025.
6/10/25	U.S. Court of Appeals for the Federal Circuit Order in Case # 2025-1812 & Case #2025-1813	Tariffs	The U.S. Court of Appeals for the Federal Circuit issued an Order confirming that President Trump's IEEPA tariffs will remain in place until the subject consolidated cases challenging the validity of the tariff actions are decided on their merits. The Order proposes that oral arguments for the consolidated cases shall be heard *en banc* by the full court on an expedited basis (an uncommon occurrence). As of date, the oral arguments are expected to be heard on July 31, 2025.
6/9/25	Department of Justice Guidelines for Investigations and Enforcement of the Foreign Corrupt Practices Act (FCPA)	Corporate Enforcement /Department of Justice	On June 9, 2025, the U.S. Deputy Attorney General issued much-anticipated new guidelines on FCPA investigations and enforcement. The new guidelines follow a pause in FCPA enforcement pursuant to an Executive Order issued by President Trump on February 10, 2025. The guidelines align DOJ enforcement and investigations of FCPA violations with the policy objectives outlined in President Trump's earlier Executive Order that focused on tailoring FCPA

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			enforcement to address conduct that directly undermines certain U.S. national interests and limiting burdens on American companies operating abroad. As such, one primary consideration prosecutors must now take into account when pursuing a potential new FCPA action is whether the alleged misconduct relates to activities of Cartels or TCOs. In addition, prosecutors are directed to focus enforcement on individual conduct rather than conduct at the corporation level that is related to routine business practices, and to consider potential disruption of corporate activities throughout an FCPA investigation. Initiation of all new FCPA investigations and enforcement actions are required to be authorized by the Assistant Attorney General for the Criminal Division.
6/9/25	Customs and Border Protection Updated Guidance for Imports of Steel, Aluminum, and Derivative Products	Tariffs	CBP has issued guidance through the Cargo Systems Messaging Service (CSMS) to update the list of HTSUS codes subject to steel and aluminum tariffs pursuant to Section 232 of the Trade Expansion Act of 1962. The product list updates are based on the recently published annexes to the June 3, 2025, tariff action that increased the tariff rate for steel aluminum products from 25% to 50%.
6/6/25	White House Sustaining Select Efforts to Strengthen the Nation's Cybersecurity and Amending Executive Order 13694 and Executive Order 14144		President Trump issued an executive order amending prior executive actions related to combating cybersecurity threats and bolstering the U.S.'s cyber defenses. The new amendments include a policy statement highlighting China as the primary threat to U.S. cybersecurity, directives to Secretary of

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			Commerce to lead efforts to update NIST publications, and steps to push the federal government towards a transition to cryptographic algorithms that mitigate risks presented by quantum computers capable of breaking public-key cryptography used in U.S. (and global) digital systems.
6/6/25	White House Unleashing American Drone Dominance	Economic Policy/National Security	President Trump has issued an executive order focused on promoting the U.S.'s drone industry. This includes directing the Secretary of Transportation to look to solutions to ensure that flights solely in the U.S., or those that begin in the U.S. and reach U.S.-owned facilities overseas will not be subject to certain requirements for aircraft completing international navigation. The Order also focuses on prioritizing the commercialization and innovation of the U.S. drone industry, directing relevant government agencies to prioritize U.S.-origin UAS over foreign-produced aircrafts and requiring the Federal Acquisition Security Council to publish a list identifying companies that could present risks to the UAS supply chain in the U.S. The Order also directs the Secretary of Commerce to promulgate rules and complete investigations to protect the U.S. supply chain from foreign threats related to UAS. The Secretaries of Commerce, State, Defense, and Energy are directed to review and amend export regulations to permit efficient export of civil UAS to foreign countries and promote the U.S. UAS industry commercial growth. The Order was issued in tandem with another Executive

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			Order, "Restoring American Airspace Sovereignty" that focuses on bolstering the regulation drone flight to protect public safety and address risks presented by the weaponization of UAS by hostile actors.
6/6/25	White House Leading The World in Supersonic Flight	Economic Policy/National Security	President Trump issued an executive order aimed at bolstering U.S. dominance in high-speed aviation. The Order directs the Administrator of the Federal Aviation Administration (FAA) to work towards repealing multiple regulations and barriers to promote the development of supersonic flight and domestic advancement of aviation technology. The Director of the Office of Science and Technology Policy (OSTP), aided by other relevant parties, is directed to coordinate research and development to aid research, development, testing, and evaluation (RDT&E) and it's sharing through the National Science and Technology Council. The Administrator of the FAA is also directed to collaborate with foreign aviation entities to obtain bilateral aviation safety agreements.
6/3/25	White House Adjusting Imports of Aluminum And Steel Into the United States	Tariffs	President Trump has issued a proclamation raising tariffs from 25% to 50% for imports of certain aluminum and steel products and their derivatives pursuant to Section 232 of the Trade Expansion Act of 1962. The increased tariff rates go into effect on June 4, 2025. However, imports of UK-origin steel and aluminum products will remain subject to 25% tariffs, though that is subject to change on or after July 9, 2025, pursuant to the U.S.-UK Economic Prosperity Deal. More details on the

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			application of the increased tariff rates for aluminum and steel imports can be found in CBP's Cargo Systems Messages issued on June 3, 2025, available here and here.
5/31/25	Federal Register Notice of Product Exclusion Extensions: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation	Tariff Exclusions	The USTR announced the extension of certain exclusions from tariffs imposed on imports of Chinese-origin goods pursuant to the USTR's investigation into "China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation" under Section 301 of the Trade Act of 1974. The tariff exclusions originally set to expire on May 31, 2025, will continue to apply through August 31, 2025. This exclusion extension follows several prior extensions granted for certain products during the Biden Administration and the USTR's findings during four-year review of the Section 301 actions published on May 14, 2024.
5/28/25	Court of International Trade Slip Opinion 25-66 *Update: On May 29th, the U.S. Court of Appeals for the Federal Circuit in Washington, DC granted the United States' request for an administrative stay of the Court of International Trade's injunction until further notice.	Tariffs	The Court of International Trade (CIT) issued an opinion based on two lawsuits, one brought by a group of small businesses and one brought by a coalition of 12 states, ruling that President Trump's tariff actions implemented pursuant to the International Emergency Economic Powers Act (IEEPA) are unconstitutional. Accordingly, the opinion implements an injunction barring operation of the tariff actions and required the Trump Administration to issue orders stopping the tariff actions within 10 days. The CIT's decision does not impact the validity of tariff actions based on authorities other than the IEEPA, such as tariffs imposed under Section 301 tariffs imposed

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			on a wide-range of Chinese-origin goods and Section 232 tariffs imposed on aluminum, steel, automobile, and automobile part imports.
5/28/25	OFAC Frequently Asked Questions (FAQs) for Syria General License 25	U.S. Economic Sanctions	On May 13, 2025, President Trump announced his intent to ease sanctions imposed on Syria to support the new government and help stabilize Syria. OFAC, in concurrence with this new policy, has issued General License 25 (GL 25) authorizing a wide range of transactions previously prohibited under the Syrian Sanctions Regulations. The new general license authorizes activities such as new investment Syria, the provision of services to companies and people within Syria, dealing in petroleum or petroleum products from Syria, and transacting with the current Syrian government as well as blocked parties listed in in the Annex to GL 25. U.S. financial institutions can process transactions with the Central Bank of Syria, but property of that bank remains blocked. Importantly, the general license does not authorize transactions involving any parties, including Bashar al-Assad and associates, on OFAC's SDN list or that involve an entity owned 50% or more by SDNs (other than those listed in the Annex).
5/23/25	White House Fact Sheet: President Donald J. Trump Directs Reform of the Nuclear Regulatory Commission	National Security and Energy Policy	President Trump has issued 4 Executive Orders focused on nuclear power and the Nuclear Regulatory Commission (NRC). The orders reform NRC nuclear policies to promote the expansion of U.S. nuclear energy capacity and establish new expedited timeframes for related licensing and approval procedures. The orders also focus

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			on strengthening the domestic nuclear industry through expansion of the domestic workforce to decrease reliance on foreign energy and highlight the role nuclear energy infrastructure plays in enhancing domestic AI computing and advanced technologies. Notably, the President has also directed the Secretary of State to focus on agreements and other necessary activities to support American nuclear exports.
5/16/25	White House What They Are Saying: Trillions in Great Deals Secured for America Thanks to President Trump	Economic Policy/Foreign Investment	Following President Trump's Middle East visit, several countries within the region announced investment deals in the U.S. and multiple deals with U.S.-based aerospace, defense, and technology companies. The total value reaches over $200 trillion, with a $1.2 trillion economic exchange agreement with Qatar and an additional $243.5 billion for commercial and defense deals between the U.S. and Qatar, $200 billion in commercial deals between the U.S. and U.A.E., and a $600 billion investment commitment from Saudi Arabia. The White House announcement highlights that these deals are meant to strengthen the U.S. economy as well as foster security and safety within the Middle East.
5/12/25	Department of Commerce Department of Commerce Rescinds Biden-Era Artificial Intelligence Diffusion Rule, Strengthens Chip-Related Export Controls	Export Controls	The Department of Commerce (DOC) announced the recission of the "AI Diffusion Rule" set to begin being enforced on May 15, 2025. The AI Diffusion Rule, issued by President Biden on January 15, 2025, included new controls on advanced computing technology and ICs and on certain advanced closed-weight AI models. It also added new license

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			exceptions and introduced a new authorization process for building data centers abroad. Based on the recission announcement, BIS has been directed to not enforce the AI Diffusion Rule and will likely issue a replacement rule in its place in the coming weeks.
5/12/25	Department of Justice Memorandum: Focus, Fairness, and Efficiency in the Fight Against White-Collar Crime	Corporate Enforcement	The Head of the DOJ's Criminal Division, Matthew Galeotti, issued a division-wide memorandum announcing new investigative and policy priorities related white collar enforcement. The Memo directs the Criminal Division to focus investigations and prosecutions on 10 key areas including tariff evasion and other forms of trade and customs fraud, threats to U.S. national security such as violations of economic sanctions and conduct that supports Cartels, hostile nation-states, and other foreign terrorist organizations, and bribery and money-laundering activities related to the manufacturing of illegal drugs. The Memo also announced modifications to the DOJ's Corporate Whistleblower Awards Pilot Program to align with the updated priority enforcement areas and highlighted revisions to the Criminal Division's Corporate Enforcement and Voluntary Self-Disclosure Policy to clarify additional benefits of self-reporting misconduct to the DOJ.
5/12/25	White House Modifying Reciprocal Tariff Rates to Reflect Discussions with the People's Republic of China	Tariffs	Following the announcement of a trade agreement with China, President Trump issued an Executive Order modifying the reciprocal tariffs originally imposed on China under Executive Order 14257 and subsequent orders. Effective May 14, 2025, for a period of 90 days the reciprocal

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			tariff rate on Chinese-origin imports will be 10%. In addition, the *ad valorem* tariff rate for low-value *de minimis* shipments from China is reduced from 120% to 54%, or a $100 fixed duty per postal item. Importantly, other tariffs on imports from China such as the Section 301, Section 232, and fentanyl tariff actions remain in place and are not impacted by the May 12th Executive Order.
5/12/25	White House Joint Statement on U.S.-China Economic and Trade Meeting in Geneva	Economic Policy/Tariffs	Following a May 11, 2025, initial announcement of a new trade deal with China, the U.S. and China published a joint statement outlining key aspects of the new agreement, including the implementation of tariff reductions by 115% by both countries. The tariff reductions will remain in place for a period of 90 days during which both countries will continue to discuss trade relations. The Joint Statement highlights that both the U.S. and China intend to work toward a mutual opening of their markets and that China is also expected to remove non-tariff barriers to U.S. trade as part of the agreement.
5/8/25	White House Fact Sheet: U.S.-UK Reach Historic Trade Deal	Economic Policy/Tariffs	President Trump announced a much-anticipated agreement between the U.S. and UK outlining new reciprocal tariff developments. Notably, President Trump's 10% reciprocal tariff on imports of UK-origin goods will remain in place under the trade deal. However, the 25% tariffs imposed on steel and aluminum products from all countries will be reduced to 0% for UK-origin steel and aluminum imports. In addition, the Section

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			232 tariffs imposed on automotive imports will be reduced to 10% for the first 100,000 vehicles imported by UK car manufacturers each year, with additional vehicle imports subject to a 25% tariff rate. See general terms of the trade agreement here.
5/5/25	White House Regulatory Relief to Promote Domestic Production of Critical Medicines	Economic Policy	President Trump issued an Executive Order focused on the advancement of U.S. manufacturing of pharmaceuticals. The E.O. directs the Food and Drug Administration to take steps to amend relevant regulations in order to reduce the amount of time required for approval of domestic manufacturing activities and streamline regulatory reviews of pharmaceutical manufacturing. In addition, the Environmental Protection Agency is directed to take steps to expedite regulatory approval processes related to domestic manufacturing facilities for pharmaceuticals. Overall, the E.O. aims to further the Trump Administration's policy of restoring "a robust domestic pharmaceutical manufacturing base."
4/29/25	White House Trump Effect: A Running List of New U.S. Investment in President Trump's Second Term	Foreign Investment	The White House published an article highlighting new investments made in the U.S., primarily with respect to AI and manufacturing development, made by multinational corporations and foreign governments since the start of President Trump's second term. The article includes a running list of investment announcements from notable companies including Amazon, Taiwan Semiconductor Manufacturing Company, and Hyundai.
4/29/25	White House	Tariffs	President Trump issued a Proclamation amending

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	Amendments To Adjusting Imports of Automobiles and Automobile Parts into the United States		Proclamation 10908, dated March 26, 2025, which originally imposed a 25% tariff on imports of automobiles and certain auto parts. The new Proclamation creates an "import adjustment offset" enabling certain qualifying manufacturers of automobiles that undergo final assembly in the U.S. to receive a specified import adjustment offset amount applicable to Section 232 duties on automobile parts through April 2027. The Secretary of Commerce is directed to establish an application process within 30 days of the Proclamation where manufacturers seeking an import adjustment offset amount may submit applications to the Secretary. Applications for the import adjustment offset amount shall include documentation related to the manufacturer's import data and statistics, manufacturing projects in the U.S., projected tariff costs, and other information related to auto part imports.
4/29/25	White House Addressing Certain Tariffs on Imported Articles	Tariffs	President Trump issued an Executive Order confirming that certain previously implemented tariff measures will not be cumulatively assessed on certain imports (i.e., certain tariff measures will not "stack" on top of each other). The E.O. provides clarification on the interplay of tariffs imposed on Mexico and Canada under the International Emergency Economic Powers Act (IEEPA), tariffs imposed on all imports of steel, aluminum, automobiles, and automobile parts under Section 232 of the Trade Expansion Act of 1962, and other tariff actions implemented over the past months. Importantly, the E.O.

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			applies retroactively to all entries made on or after March 4, 2025, meaning some importers may be able to request refunds for overpaid duties based on the E.O. clarifications.
4/24/25	Federal Register Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Trucks	Economic Policy/Tariffs	The U.S. Department of Commerce initiated an investigation under Section 232 of the Trade Expansion Act of 1962 into the national security impacts of imports of medium-and heavy-duty trucks, truck parts, and their derivative products. The investigation began on April 22, 2025, and may lead to new tariffs imposed on products subject to the investigation. Interested parties, including those that may be impacted by new tariffs, are invited to submit comments for consideration during Commerce's investigation. The deadline for the submission of comments will be May 16, 2025.
4/24/25	White House Unleashing America's Offshore Critical Minerals and Resources	Economic Policy	President Trump issued an Executive Order establishing a framework to advance the exploration and exploitation of offshore critical minerals and seabed resources. The Executive Order seeks to expedite permitting processes related to seabed exploration, mining, and mineral processing and bolster the U.S. domestic supply chain for critical minerals. Within 60 days, specified Department heads, including the Secretaries of Commerce, Defense, and Energy must take action to expedite and streamline respective permitting processes and provide reports on specified topics related to furthering seabed exploration and critical mineral exploitation.
4/23/25	Federal Register	Economic Policy/Tariffs	This Notice follows the USTR's investigation of China's actions,

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	Notice of Action and Proposed Action in Section 301 Investigation of China's Targeting the Maritime, Logistics, and Shipbuilding Sectors for Dominance, Request for Comments		practices, and policies in the maritime, ship building, and logistics sectors. The USTR determined that China's targeting of these areas is unreasonable, decreasing competition and increasing U.S. dependency on China in a way that is harmful to U.S. business and counter to the goal of bolstering U.S. supply chain resilience. The USTR determined that appropriate action includes enactment of the following: maritime transport services fees (for Chinese built, owned, or operated vessels as well as vessel operators of foreign vehicle carriers) and certain restrictions on maritime transport services to encourage U.S. transport for U.S. goods. In addition, the USTR proposed additional tariffs on certain chassis equipment, and STS cranes.
4/23/25	White House Transparency Regarding Foreign Influence at American Universities	Department of Justice	This Executive Order directs the Department of Education to strengthen enforcement of foreign funding disclosure requirements under the Higher Education Act, aiming to increase transparency and protect national interests in higher education. It also authorizes audits, investigations, and funding consequences for noncompliance, with an emphasis on revealing the true sources and purposes of foreign financial contributions to universities.
4/17/25	White House Restoring American Seafood Competitiveness	Economic Policy	This Executive Order directs federal agencies to revise or eliminate regulations that hinder domestic seafood production and to promote policies that support the competitiveness, sustainability, and modernization of the U.S. fishing industry. It also initiates a

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			coordinated strategy to address illegal and unethical global fishing practices, improve seafood trade policy, and expand domestic processing and export capacity.
4/17/25	White House Unleashing American Commercial Fishing in the Pacific	Economic Policy	This proclamation lifts the prohibition on commercial fishing within the Pacific Remote Islands Marine National Monument's expanded areas, allowing regulated domestic fishing while maintaining environmental protections under existing federal laws. It directs federal agencies to revise related regulations and coordinate oversight to support sustainable fishing and local economic activity without compromising the scientific and historic integrity of the monument.
4/16/25	Federal Register Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Semiconductors and Semiconductor Manufacturing Equipment	Economic Policy/Tariffs	The U.S. Department of Commerce initiated an investigation into the national security impacts of imports of semiconductors, semiconductor manufacturing equipment, and derivative products under Section 232 of the Trade Expansion Act of 1962. The investigation began on April 1, 2025, and will culminate in a report (due no later than December 27, 2025) presented by Commerce to the President detailing investigation findings and Commerce's recommendations on what actions should be taken to address identified national security risks. The investigation may lead to the assessment of new tariffs on semiconductor and related imports. Interested parties, including those that may be impacted by new tariffs, may submit public comments for consideration by Commerce up to May 7, 2025, when the comment period closes.

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4/16/25	Federal Register Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients	Economic Policy/Tariffs	The U.S. Department of Commerce initiated an investigation under Section 232 of the Trade Expansion Act of 1962 into the national security impacts of imports of pharmaceuticals and pharmaceutical ingredients, including finished drug products, medical countermeasures, critical inputs such as active pharmaceutical ingredients, and key starting materials, and derivative products of those items. The investigation began on April 1, 2025, and will culminate in a report (due no later than December 27, 2025) presented by Commerce to the President detailing investigation findings and Commerce's recommendations on what actions should be taken to address identified national security risks. The investigation may lead to the assessment of new tariffs on pharmaceuticals and related products. Interested parties, including those that may be impacted by new tariffs, may submit public comments for consideration by Commerce up to May 7, 2025, when the comment period closes.
4/15/25	White House Ensuring National Security and Economic Resilience Through Section 232 Actions on Processed Critical Minerals and Derivative Products	Economic Policy/Tariffs	President Trump issued an Executive Order directing the Secretary of Commerce to initiate an investigation under Section 232 of the Trade Expansion Act of 1962 into whether imports of processed critical minerals and derivative products impair U.S. national security. The Secretary of Commerce must submit a draft interim report of investigation findings and recommended actions within 90 days of the E.O. A final report, expected to include tariff

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			recommendations, is due 180 days after Commerce officially initiates the investigation. A notice of this investigation may be published in the Federal Register in the coming days that may also provide a period of opportunity for interested parties to submit comments to Commerce for consideration in its investigation.
4/11/25	White House Clarification of Exceptions Under Executive Order 14257 of April 2, 2025, as Amended	Tariffs	A Presidential Memorandum was issued clarifying the scope of exclusions for semiconductor products from reciprocal tariffs. This Memorandum provides a list of semiconductor products classified under Chapters 84 and 85 of the HTS that are excluded from reciprocal tariffs implemented under E.O. 14257, as amended. The exclusions apply as of April 5, 2025, and are in addition to product exclusions originally set forth in Annex II of E.O. 14257.
4/9/25	White House Modifying Reciprocal Tariff Rates to Reflect Trading Partner Retaliation and Alignment	Customs/Tariffs	In response to an 84% tariff announced by China on U.S. goods, President Trump ordered a further tariff increase on imports from China from 84% to 125% and raised tariffs on *de minimis* imports from China. The Executive Order also temporarily paused country-specific tariffs for other trade partners until July 1, 2025. In the meantime, a 10% blanket tariff applies to covered imports from all countries- except China, Mexico, and Canada- which are subject to separate tariffs as set forth in this Executive Order and past actions.
4/8/25	White House Amendment To Reciprocal Tariffs and Updated Duties as Applied to Low-Value Imports from the	Customs/Tariffs	In response to new tariffs imposed by China on U.S. goods, President Trump has ordered an increase in certain U.S. tariffs on low-value imports from China, raising specific tariffs from 34% to 84% and

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	People's Republic of China		increasing tariffs on *de minimis* shipments. These changes aim to ensure the effectiveness of earlier trade measures and will be implemented through modifications to the Harmonized Tariff Schedule and related regulations.
4/2/25	White House Further Amendment to Duties Addressing the Synthetic Opioid Supply Chain in the People's Republic of China as Applied to Low-Value Imports	Imports/Tariffs	President Trump issued an executive order eliminating duty-free *de minimis* treatment for covered goods imported from China, effective May 2, 2025. Goods imported from China via means other than the "international postal network" will be subject to all applicable duties imposed on Chinese goods despite whether they qualify for the *de minimis* exemption under 19 U.S.C. 1321(a)(2)(C). *De minimis* qualifying goods sent from China via the international postal network are subject to a duty rate of either 30% of the value or $25 per item (increasing to $50 after June 1, 2025) but will be exempt from all other duties on Chinese imports.
4/2/25	White House Regulating Imports with a Reciprocal Tariff to Rectify Trade Practices that Contribute to Large and Persistent Annual United States Goods Trade Deficits	Tariffs	President Trump declared a national emergency in response to large and persistent U.S. goods trade deficits, citing non-reciprocal trade practices and foreign economic policies that have weakened domestic manufacturing and defense capabilities. To address these imbalances, the order imposes a 10% blanket tariff on most imports, with higher country-specific rates for certain trading partners, and outlines detailed implementation rules, exceptions, and modification authorities. The

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			policy aims to restore domestic production capacity, protect national security, and incentivize trading partners to adopt more reciprocal trade arrangements.
3/31/25	White House Establishing The United States Investment Accelerator	Foreign Investment	This executive order establishes the United States Investment Accelerator within the Department of Commerce to streamline regulatory processes and support investments over $1 billion by assisting with permitting, resource access, and collaboration efforts. It directs federal agencies to coordinate and modernize procedures to attract and expedite both domestic and foreign investment, while remaining consistent with existing laws and national security considerations.
3/26/25	White House Adjusting Imports Of Automobiles And Automobile Parts Into The United States	Tariffs	President Trump issued a proclamation directing a 25% tariff on certain imported automobiles and automobile parts starting April 3, 2025, based on findings that continued import levels affect the United States' industrial capacity and supply chain resilience. The measure establishes procedures for applying the tariff, particularly under the USMCA, and authorizes ongoing monitoring and adjustments to support domestic manufacturing capabilities.
3/24/25	White House Imposing Tariffs on Countries Importing Venezuelan Oil	Tariffs	President Trump issued an executive order intensifying economic measures against Venezuela, citing the Maduro regime's ongoing threat to U.S. national security and the infiltration

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			of the Tren de Aragua gang into the U.S. He authorized a 25% tariff on goods from countries that import Venezuelan oil, to be enforced starting April 2, 2025, as part of broader efforts to curtail Venezuela's destabilizing activities.
3/14/25	White House Continuing The Reduction of the Federal Bureaucracy	Department of Justice	This executive order reduces the scope of the federal bureaucracy by eliminating non-statutory functions and minimizing statutory operations of several government entities, including the Minority Business Development Agency and the U.S. Interagency Council on Homelessness. It also directs agency heads to report compliance within seven days and restricts budgetary approvals for affected entities.
3/13/25	Federal Register Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Copper	National Security/Economic Policy	The Department of Commerce initiated an investigation under Section 232 of the Trade Expansion Act of 1962 into the impact imports of copper, in various forms, and derivative products have on U.S. national security. Following President Trump's February 25 Executive Order directing the Department of Commerce and other relevant agency heads to take certain actions to address identified national security risks presented by U.S. reliance on foreign supplies of copper and the lagging domestic smelting and refining industry. Interested parties may submit public comments to the Office of Strategic Industries and Economic Security at the Department of Commerce for consideration until April 1, 2025.

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3/3/25	Federal Registrar Further Amendment to Duties Addressing the Synthetic Opioid Supply Chain in the People's Republic of China	U.S. Economic Sanctions	The amendment doubles tariffs on certain Chinese goods from 10% to 20% due to the PRC's failure to take adequate steps against the illicit synthetic opioid trade. It maintains that the order does not affect existing legal authorities or create enforceable rights.
3/2/25	Federal Registrar Amendment to Duties to Address the Situation at Our Southern Border	Imports/Tariffs	The amendment modifies Executive Order 14194 to limit duty-free de minimis treatment for certain covered articles under 19 U.S.C. 1321, making it conditional on the Secretary of Commerce confirming that systems are in place to efficiently process and collect applicable tariff revenue. It also clarifies that the order does not affect existing legal authorities or create enforceable rights.
2/25/25	Federal Registrar Addressing the Threat to National Security from Imports of Copper	Imports/Tariffs	Order 14220 addresses national security concerns related to copper imports and directs the Secretary of Commerce to initiate an investigation into copper imports pursuant to Section 232 of the Trade Expansion Act of 1962.
2/18/25	White House Ensuring Accountability for All Agencies	Department of Justice	This order injected the President and the Department of Justice directly into the regulatory and interpretive processes of all federal agencies, mandating that agencies align their regulations and interpretations with the administration's policies, subject to oversight by the President and the Attorney General.
2/13/25	White House Reciprocal Trade and Tariffs	Tariffs	President Trump issued a memorandum outlining the U.S. policy to reduce the persistent annual trade deficit and address inequitable and unbalanced trade

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			practices with foreign partners. He memorandum introduces the "Fair and Reciprocal Plan," which seeks to counter non-reciprocal trading arrangements by determining the equivalent of a reciprocal tariff with respect to each foreign trading partner.
2/10/25	White House Pausing Foreign Corrupt Practices Act Enforcement to Further American Economic and National Security	Department of Justice	This executive order directs a temporary pause and review of Foreign Corrupt Practices Act (FCPA) enforcement, arguing that its current application harms U.S. foreign policy and economic competitiveness. The Attorney General is instructed to reassess FCPA policies to better align with presidential authority over foreign affairs and national security interests.
2/10/25	White House Strengthening American Leadership In Digital Financial Technology	Economic Policy	President Trump issued an executive order to bolster U.S. leadership in the cryptocurrency and digital assets sectors. The order seeks to establish regulatory clarity, promote innovation, and position the U.S. as the global leader in digital financial technology.
2/10/25	White House Adjusting Imports of Steel into The United States	Tariffs	President Trump announced the reinstatement of a 25% tariff on all steel and aluminum imports into the United States. This move is intended to support domestic metal industries by reducing foreign competition. Critics warn it may increase costs for U.S. manufacturers and consumers and strain relationships with key allies.
2/6/25	White House	U.S. Economic Sanctions	President Trump issued an executive order authorizing

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	Imposing Sanctions on The International Criminal Court		sanctions against individuals and their families who assist the International Criminal Court (ICC). The administration accused the ICC of unjustly targeting the U.S. and its ally, Israel, particularly following the court's issuance of arrest warrants against Israeli officials for alleged war crimes in Gaza.
2/3/25	White House Progress on the Situation at Our Northern Border White House Progress on the Situation at Our Southern Border	Tariffs	After discussions with Mexican President Claudia Sheinbaum and Canadian Prime Minister Justin Trudeau, President Trump agreed to delay the implementation of new tariffs on imports from Mexico and Canada for 30 days.
2/3/25	White House A Plan for Establishing a United States Sovereign Wealth Fund	Economic Policy/Foreign Investment	President Trump issued an executive order directing the Treasury and Commerce Departments to create a U.S. sovereign wealth fund. The fund is intended to serve as an investment tool for the country, with potential plans to acquire companies like TikTok. The establishment of the fund requires congressional approval and is expected to be completed within 12 months.
2/1/25	White House Fact Sheet: President Donald J. Trump Imposes Tariffs on Imports from Canada, Mexico and China	Tariffs	President Trump issued an executive order imposing a 25% tariff on imports from Mexico and Canada, including a 10% tariff on Canadian energy products, and a 10% tariff on imports from China.
1/27/25	White House Prioritizing Military Excellence and Readiness	Department of Justice	President Trump issued an executive order titled "Prioritizing Military Excellence and Readiness," directing DOJ

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			involvement in military-related legal matters and emphasizing prosecution of offenses related to national security.
1/26/25	White House Statement from the Press Secretary	Tariffs	Action: The U.S. imposed 25% tariffs on imports from Colombia and implemented travel and visa restrictions due to Colombia's refusal to accept deported migrants. Update: The measures were paused after Colombia agreed to resume deportation flights from the U.S.
1/21/25	White House America First Trade Policy	Tariffs	On January 20, 2025, President Trump issued a memorandum directing federal agencies to implement an "America First" trade policy, emphasizing domestic investment, productivity, and additional tariffs on Canada, Mexico, and China.
1/20/25	White House America First Trade Policy	Tariffs	President Trump issued a Memorandum directly addressing tariffs by proposing a global supplemental tariff, or other policies, to remedy trade deficits and identified national security risks.
1/20/25	White House Designating Cartels and Other Organizations as Foreign Terrorist Organizations and Specially Designated Global Terrorists	U.S. Economic Sanctions	The Order declares a national emergency to combat cartels and transnational organizations, designates them as Foreign Terrorist Organizations, and authorizes OFAC to impose sanctions on FTOs
1/20/25	White House Protecting the American People Against Invasion	Department of Justice	The Order directs the Attorney General to prioritize the prosecution of criminal offenses related to unauthorized entry or

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			continued unauthorized presence of aliens in the United States.

About Torres Trade Law:

Our firm is a national law firm specialized in international trade and national security law. We represent clients ranging from Fortune 100 companies to small businesses that are located throughout the United States and the world. Through our professional network we can resolve the most complicated issues impacting global business in today's high stakes regulatory environment.

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