



## Reciprocal Tariffs FAQ

### Background

On 02 Apr 2025, President Trump signed an [executive order](#) imposing reciprocal tariffs on 60 countries, while the remaining countries faced a 10% tariff. These tariffs were to take effect on 09 Apr 2025 and 05 Apr 2025, respectively.

Then, as of 10 Apr 2025, except for China, Canada, and Mexico, all countries were subject to a 10% baseline tariff as per an [executive order](#) from the White House released the same day. Since then, there have been negotiations between the White House and multiple countries to reduce the *Liberation Day* tariffs.

### What countries are affected?

Negotiations continued over the last three months resulting in the table below with the new reciprocal tariffs effective 12:01 AM ET 07 Aug 2025 as per an [executive order](#) published on 31 Jul 2025. *Any country not mentioned below will be subject to a Reciprocal tariff of 10%.* President Trump may alter these rates as negotiations continue.

Country	Duty Rate		Duty Rate	Country	Duty Rate
Afghanistan	15%	Iceland	15%	North Macedonia	15%
Algeria	30%	India	25%	Norway	15%
Angola	15%	Indonesia	19%	Pakistan	19%
Bangladesh	20%	Iraq	35%	Papua New Guinea	15%
Bolivia	15%	Israel	15%	Philippines	19%
Bosnia & Herzegovina	30%	Japan	15%	Serbia	35%
Botswana	10%	Jordan	15%	South Africa	30%
Brazil*	10%	Kazakhstan	25%	South Korea	15%
Brunei	25%	Laos	40%	Sri Lanka	20%
Cambodia	19%	Lesotho	15%	Switzerland	39%
Cameroon	15%	Libya	30%	Syria	41%
Chad	15%	Liechtenstein	15%	Taiwan	20%
Costa Rica	15%	Madagascar	15%	Thailand	19%
China*	10%	Malawi	15%	Trinida & Tobago	15%
Cote-D'Ivoire	15%	Malaysia	19%	Tunisia	25%
Dem Rep of Congo	15%	Mauritius	15%	Turkey	15%

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<b>Ecuador</b>	15%	<b>Moldova</b>	25%	<b>Uganda</b>	15%
<b>Equatorial Guinea</b>	15%	<b>Mozambique</b>	15%	<b>United Kingdom</b>	10%
<b>European Union (duty rate =&gt; 15%)</b>	0%	<b>Myanmar (Burma)</b>	40%	<b>Vanuatu</b>	15%
<b>European Union (duty rate &lt; 15%)</b>	15%	<b>Namibia</b>	15%	<b>Venezuela</b>	15%
<b>Falkland Islands</b>	10%	<b>Nauru</b>	15%	<b>Vietnam</b>	20%
<b>Fiji</b>	15%	<b>New Zealand</b>	15%	<b>Zambia</b>	15%
<b>Ghana</b>	15%	<b>Nicaragua</b>	18%	<b>Zimbabwe</b>	15%
<b>Guyana</b>	15%	<b>Nigeria</b>	15%		

\*The European Union consists of the following member countries:

European Union Member Countries (15%)				
Austria	Denmark	Hungary	Luxembourg	Romania
Belgium	Estonia	Rep of Ireland	Malta	Slovakia
Bulgaria	Finland	Italy	The Netherlands	Slovenia
Croatia	France	Latvia	Poland	Spain
Cyprus	Germany	Lithuania	Portugal	Sweden
Czechia	Greece			

## Reciprocal Tariff Rate for China

### **NEW: What is the current China Reciprocal Tariff Rate?**

Per the [Executive Order](#), effective Apr 10, 2025, the reciprocal tariff rate assessed on China, Hong Kong, and Macau is at 125%. Then, on May 14, 2025, the US and China agreed to reduce their respective tariffs for 90 days to a 10% baseline tariff as per the an [Executive Order](#) from the White House.

The latest 90-day reduction for China's Reciprocal Tariffs to 10% was due to expire at 12:01 AM ET on August 12, 2025 was extended an additional 90-days when the White House issued an [Executive Order](#) on August 11, 2025.

This additional 90-day pause extends the 10% Reciprocal Tariff rate through 12:01 AM ET on November 10, 2025.

This rate does not include the IEEPA Fentanyl Tariff of 20% or any additional trade remedies such as Sec 301 (which could be either 7.5% or 25%). Therefore, potential duties paid on Chinese, Hong Kong, or Macau-origin goods could total as much as 55% plus the normal duties as per the example below:

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Commodity	Duty Rate
Normal Duty Rate	As per HTS
Sec 301 (if applicable)	7.5% or 25%
IEEPA Fentanyl	20%
IEEPA Reciprocal Tariff	10%
<b>TOTAL:</b>	<b>37.5%-55% plus the normal Duties</b>

## Are the special administrative regions that are part of China subject to the China Reciprocal Tariff Rate?

Per the Executive Order, the reciprocal tariff rate assessed on China also applies to the special administrative regions (SARs) of Hong Kong and Macau.

## Reciprocal Tariff Rates for Canada & Mexico

### NEW: What about Canada and Mexico?

Mexico has been granted an additional 90-days during which the US and Mexico will continue tariff rate discussions for products not covered by USMCA. The current IEEPA rate of **25%** applies for Mexico for non-USMCA eligible imported products.

As for Canada, an [Executive Order](#), published on Jul 31, 2025, applies a rate of 25% on certain Canadian products, and 10% on certain Canadian energy or energy resources imported into the USA - applicable as of 12:01 ET on August 1st, 2025. Additional tariffs under IEEPA will stack onto these ad valorem levels. Items covered by the USMCA are excluded from these rates.

The IEEPA Fentanyl rate 10% duty rate still applies to Canadian or Mexican energy-related items and Potash.

Country	Commodity	USMCA Eligible	Normal Duties	IEEPA Fentanyl	Reciprocal Tariff	Total Duty
<b>Mexico</b>	Non-USMCA Commodities HTS 9903.01.01	⊘	✓ As per HTS	✓ 25%	N/A	25%+Normal Duties
<b>Mexico</b>	USMCA-eligible Commodities HTS 9903.01.04	✓	✓ Free	N/A	N/A	Free
<b>Mexico</b>	Mexican Potash (non-USMCA) HTS 9903.01.05	⊘	✓ As per HTS	✓ 10%	✓ N/A	10%+Normal Duties

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<b>Canada</b>	Non-USMCA Commodities HTS 9903.01.10	⊘	✓ As per HTS	✓ 35%	N/A	35%+Normal Duties
<b>Canada</b>	Energy-Related items HTS 9903.01.13	✓	✓ Free	✓ 10%	✓ N/A	10%
<b>Canada</b>	USMCA-eligible Commodities HTS 9903.01.14	✓	✓ Free	N/A	N/A	Free
<b>Canada</b>	Canadian Potash (non- USMCA) HTS 9903.01.15	⊘	✓ As per HTS	✓ 10%	N/A	10%+Normal Duties
<b>Canada</b>	Transshipped non-USMCA Canadian goods	⊘	✓ As per HTS	✓ 40%	N/A	40%+Normal Duties

Canada/Mexico rates

**Note:** The above table does not cover automobiles and auto parts.

## Reciprocal Tariff Rate for Brazil

### NEW: What is the situation with Brazil?

The White House issued an [Executive Order](#) on Jul 30, 2025, declaring a national emergency related to the Government of Brazil earlier this week. As part of this action, a 40% additional duty will be imposed on designated Brazil-origin goods under the International Emergency Economic Powers Act (IEEPA).

This additional duty stacks onto the 10% reciprocal tariff assigned to Brazil in the table above for a total additional duty of 50%. This can be seen in the example below.

Loading Date	Normal Duties	IEEPA EO 7/30	Reciprocal Tariff	Total Duty
07 Apr 2025	✓ As per HTS	✓ 40%	✓ 10%	50%+Normal Duties

The Reciprocal Tariff is 10% for imports from Brazil under HTS 9903.02.09. An additional 40% tariff is applied under 9903.01.77 unless subject to an exemption as listed in the **Brazil Exclusion HTS** tab in [this document](#).

## Reciprocal Tariff Rate for the EU

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## NEW: How does the EU Reciprocal Tariff work?

In the White House issued [Executive Order](#) from Jul 31, 2025 detailing the country-specific Reciprocal Tariffs, the European Union was split into two separate rates. The rates are calculated as follows:

If the normal duty rate is less than 15%, the normal duties + the reciprocal tariff shall equal 15% in total.

If the normal duty rate, however, is at least 15%, then the normal duties + the reciprocal tariff shall equal the normal duty rate.

### Example #1:

Ball Bearings with Integral Shafts and an OD not over 30mm under HTS 8482.10.1040 with a normal duty rate of 2.4%

**Total Duty Rate (normal duty rate + reciprocal) = 15%**

### Example #2:

Beef under HTS 0202.30.50.85 with a duty rate of 4.4¢ / kg and a value of \$100

$$AVE = \left( \frac{\text{Specific Tariff}}{\text{Value of Goods}} \right) \times 100$$

Ad Valorem equivalent =  $(0.044 / 100) \times 100 = 4.4\%$

**Total Duty Rate (normal duty rate + reciprocal) = 15%**

### Example #3:

Men's Knit Cotton Sweater under HTS 6110.20.2010 with a normal duty rate of 16.5%

**Total Duty Rate (normal duty rate + reciprocal) = 16.5%**

## Reciprocal Tariff Rate for the UK

### The US announced a UK-US trade agreement on 08 Mar 2025. How does that affect the Reciprocal Tariffs from the UK?

While the details remain to be worked out, some of the key takeaways from the framework agreement include the following:

- ✓ The Reciprocal Tariff rate will remain at 10% for all goods out of the UK.
- ✓ A separate arrangement will be made regarding the Sec 232 tariffs for Steel and Aluminum imported items, including quotas.\*
- ✓ Annually, 100,000 UK-made imported vehicles will be subject to the 10% reciprocal tariff. Any additional imported vehicles will be subject to a 25% tariff.
- ✓ The UK will gain access to an additional \$5 billion in US exports

A [White House Fact Sheet](#) details the additional benefits of the deal.

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***The effective date for the UK Tariffs is Jun 30, 2025.***

\*There are separate HTS to declare the Sec 232 Tariffs ex UK that delineate the 25% duty rate for the UK.

## Reciprocal Tariff Rate for India

**NEW: The White House released an additional notice assessing additional duties to India. Can you please explain what this is all about?**

The White House issued an [Executive Order](#) on Aug 6, 2025, pursuant to the **International Emergency Economic Powers Act (IEEPA)**, imposing trade penalties on India for its continued purchase of oil from the Russian Federation. This action is intended to address India's indirect support of Russia's ongoing conflict with Ukraine and introduces additional duties beyond the existing reciprocal tariff rate of 25%

The executive order does the following:

### 1. Imposition of New Tariffs

- A 25% ad valorem duty will be applied to imports from India, based on findings that India is directly or indirectly sourcing oil from Russia.
- The new tariff will go into effect 21 days from the issuance date (**August 27, 2025**), with exemptions granted for goods already in transit as of that date.

### 2. Scope and Duty Application

- The newly imposed duty is in addition to existing tariffs, unless specifically exempted under applicable laws or prior executive orders.
- Goods admitted into Foreign Trade Zones (FTZs) must be designated as "privileged foreign status" to ensure proper duty assessment.

### 3. Presidential Authority for Modification

- The President retains the authority to amend or revoke the order based on evolving circumstances, including retaliatory actions by foreign governments.
- Restrictions may be eased if affected countries demonstrate alignment with US foreign policy objectives.

### 4. Monitoring and Future Recommendations

- The Secretary of Commerce will oversee ongoing assessments of other nations importing Russian oil.
- A coalition of senior officials may issue recommendations for further action, based on continued monitoring and geopolitical developments.

**NEW: Are there in-transit provisions for India?**

The **IEEPA Reciprocal Tariff** for India went into effect on August 7, 2025. The IEEPA Russia Tariff goes into effect on August 27, 2025.

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For cargo moving via ocean to the US, where there is no transshipment, the cargo will remain at the 10% baseline rate if the following conditions are met:

- (1) Cargo is loaded onto a vessel at the port of loading and in transit on the final mode of transport prior to entry into the United States **before 12:01 a.m. EDT on August 7, 2025**, AND
- (2) The cargo is entered for consumption, or withdrawn from a warehouse for consumption, on or **after 12:01 a.m. EDT on August 7, 2025, but before 12:01 a.m. EDT on October 5, 2025**.

The new additional **IEEPA Russian Oil Tariff** (25%) on top of the IEEPA Reciprocal Tariff of 25% for India will not take effect until 27 Aug 2025. Like the change in the Reciprocal Tariffs, there will be an in-transit provision as follows:

- (1) Cargo is loaded onto a vessel at the port of loading and in transit on the final mode of transport prior to entry into the United States **before 12:01 a.m. EDT on August 27, 2025**, AND
- (2) The cargo is entered for consumption, or withdrawn from a warehouse for consumption, on or **after 12:01 a.m. EDT on August 7, 2025, but before 12:01 a.m. EDT on September 17, 2025**.

*If the cargo moves via airfreight, the in-transit provision does not apply.*

## Customs Clearance

### How will imported shipments be customs-cleared?

In addition to the standard Harmonized Tariff Schedule (HTS), new HTS codes have been assigned to account for the updated reciprocal tariff rates, identifying the country-specific rates detailed in Annex II of the proclamation – see the **Annex II – Country List & Rate** tab in [this document](#).

## Reciprocal Tariff Rate Effective Date / In-transit Provision

### **NEW:** When does this change take effect?

The executive order states that the newly updated reciprocal tariffs take effect seven (7) days after the date of the order – this would be **Aug 7, 2025**.

### **NEW:** Is there an in-transit provision for the new Reciprocal Tariffs?

Per CSMS 65829726, cargo that were:

- (3) loaded onto a vessel at the port of loading and in transit on the final mode of transport prior to entry into the United States **before 12:01 a.m. EDT on August 7, 2025**, AND

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- (4) are entered for consumption, or withdrawn from warehouse for consumption, on or **after 12:01 a.m. EDT on August 7, 2025, and before 12:01 a.m. EDT on October 5, 2025,**

are subject to the 10% ad valorem reciprocal tariff and will remain at the current 10% baseline tariff under HTS 9903.01.25.

### **NEW: Does the in-transit provision cover all modes of transit?**

No. According to CBP, the in-transit provisions for reciprocal tariffs apply **exclusively to transit via vessel** and **do not** extend to other modes of transportation, such as air, rail, or truck.

Under 19 USC 1401 and 19 CFR 4.0, a vessel is defined as any watercraft or contrivance used or capable of being used for transportation on water, excluding aircraft.



*These in-transit provisions are not applicable if a shipment starts by vessel but arrives in the United States using a different mode of transportation, such as rail or truck.*

### **Can these reciprocal tariff rates change?**

The administration has the authority to increase or decrease the scope of the tariffs.

If a country retaliates due to the reciprocal tariffs, the administration may adjust the reciprocal tariff rate upward or expand its scope. This is evident by the changes implemented on 10 Apr 2025, where the rate for China increased from 34% to 84% to 125% and then reduced to 10% on 14 May.

If a country negotiates with the administration to remedy the non-reciprocal trade arrangements, the administration may adjust or limit the scope of the reciprocal tariffs.

### **What happens to a shipment loaded in one country and stops in another before sailing to the US? Which date is used for duty calculation?**

**CBP has updated its guidance on this as of 15 May 2025:**

If cargo is not transloaded from a feeder vessel to a mother vessel, it remains in its final mode of transit. It is therefore exempt from reciprocal tariffs, provided they meet the applicable loading date parameters.

#### **Situation #1: Cargo Transported on a Single Vessel to the US**

Prior to the cutoff date for the reciprocal tariff in-transit provision, U.S.-bound cargo is loaded onto a vessel with a direct destination to the United States. While en route, the vessel may stop at foreign ports to load or offload other shipments or refuel; however, the US-bound cargo

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remains onboard. Upon arrival at a U.S. port of entry, the cargo is unloaded, and a customs declaration is submitted.

In this scenario, the cargo qualifies for the in-transit provision and is exempt from reciprocal tariffs. Since the cargo was loaded onto a vessel bound for the U.S. before the cutoff date and was never unladen or transferred to another vessel, it meets the necessary exemption criteria.

This principle is demonstrated in the following example:

- Cargo is loaded in Shanghai, China, on April 3, 2025.
- The vessel arrives in Busan, Korea, on April 5, 2025.
- The goods remain in transit when originally loaded in Shanghai. At that point, they are in their final mode of transportation and do not undergo a change in transport type (e.g., transfer to rail).
- *Since the goods were loaded in Shanghai onto a vessel prior to 12:01 AM ET on April 5, 2025, they qualify for exemption from reciprocal tariffs.*

## **Situation #2: Cargo Transported on Multiple Vessels to the US**

Alternatively, US-bound cargo may first be loaded onto a vessel destined for a foreign port before its subsequent shipment to the United States. At the foreign port, after the cutoff date, the cargo is transferred onto a different vessel destined for the US. This second vessel then arrives at a US port of entry, where the cargo is unloaded and a customs declaration is submitted.

In this case, the cargo does **not** qualify for the in-transit exclusion for reciprocal tariffs. Although the cargo may have departed from the original port of loading before the cutoff date, it was ultimately loaded onto the final vessel bound for the US **after** the cutoff date. Therefore, it does not meet the requirements for exemption under the in-transit provision.

This principle is demonstrated in the following example:

- Cargo is loaded in Shanghai, China, on April 3, 2025.
- The vessel arrives in Busan, Korea, on April 5, 2025, where goods are offloaded.
- The goods are loaded onto a new vessel departing for the US on April 7, 2025.
- The goods are now considered to be in their final mode of transportation as they have undergone a change in transport.
- *Since the goods were loaded onto a vessel in Busan after 12:01 AM ET on April 5, 2025, they no longer qualify for exemption from reciprocal tariffs.*

**An in-bond was issued prior to the effective date of the Reciprocal Tariffs. If the customs declaration is submitted after the effective date in the in-bond destination port, do the Reciprocal Tariffs apply?**

**CBP has updated its guidance on this as of 30 Apr 2025:**

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Per CBP, if the merchandise is entered with an IT (immediate transportation) dated prior to the IEEPA Reciprocal Tariff implementation date, then **it is not subject** to the additional Reciprocal Tariff.

## Exclusions from the Reciprocal Tariffs

### **NEW:** Are there any items that are excluded from the reciprocal tariffs?

The Executive Order has a separate annex listing the tariffs not subject to reciprocal tariffs. Among those items excluded from the reciprocal tariffs are the following:

Items excluded from the Reciprocal Tariffs	
<b>Items Subject to Sec 232</b>	<ul style="list-style-type: none"><li>• Iron and Steel and their derivatives</li><li>• Aluminum and its derivatives</li><li>• Passenger Vehicles (sedans, sport utility vehicles, crossover utility vehicles, minivans, cargo vans), Light Trucks, and auto parts</li><li>• Consumer Appliances (<i>added Jun 20, 2025</i>)</li><li>• Copper (<i>added Aug 1, 2025, at 50%</i>)</li></ul>
<b>Items Under Sec 232 Investigations</b>	<ul style="list-style-type: none"><li>• Pharmaceuticals</li><li>• Lumber</li><li>• Certain Critical Minerals</li><li>• Energy and Energy Products</li><li>• Semiconductors</li><li>• Medium &amp; Heavy-Duty Trucks and their associated parts</li><li>• Commercial Aircraft, Engines, and their associated parts</li></ul>
<b>Highly Sanctioned (Column 2) Countries</b>	<ul style="list-style-type: none"><li>• Cuba</li><li>• North Korea</li><li>• Russia</li><li>• Belarus</li></ul>
<b>US Content Goods</b>	<ul style="list-style-type: none"><li>• Products with 20% or more US content</li></ul>
<b>Humanitarian &amp; Informational Items</b>	<ul style="list-style-type: none"><li>• Donations to relieve human suffering</li><li>• Informational Materials (including publications, films, posters, phonograph records, photographs, microfilms, microfiche, tapes, compact disks, CD-ROMs, artworks, and news wire feeds)</li></ul>
<b>Section 321 goods with a C/O other than China or Hong Kong</b>	

The full list of excluded items (by HTS) is available here:

### [Annex II – Exemptions from Reciprocal Tariffs](#)

### [Steel, Aluminum and Copper Tariffs](#)

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## What does Column 2 Duty Rate Countries mean?

Countries classified as *Column 2 Duty Rate* do not maintain normal trade relations with the US, resulting in higher duty rates. Certain goods from these nations are entirely prohibited from being imported.

Due to the ongoing conflict between Russia and Ukraine, Russia and Belarus have been moved to Column 2. Consequently, duties on imports from Russia that are not prohibited range from 30% to 200%.

## If the imported product is on the Sec 232 list for Iron, Steel, and Aluminum, but does not contain any of these metals, is the imported product still exempt from the reciprocal tariffs?

An imported product listed under Sec 232 for Iron, Steel, and Aluminum but does not contain these metals is typically exempt from the reciprocal tariffs, as Sec 232 specifically targets products containing these metals.

The customs declaration must include an HTS indicating that the item is excluded from the reciprocal tariff because it is an iron, steel, or aluminum item or derivative (HTS 9903.01.33).

## If an imported product subject to Sec 232 for steel or aluminum with a valid importer-specific exclusion, is the item exempt from the Reciprocal Tariffs?

No. A Steel and Aluminum exclusion in place that has not expired or been fully utilized is not exempt from the reciprocal tariffs. While the Sec 232 duties may not apply based on the exclusion, the reciprocal tariffs are applicable.

## If an imported product is a steel or aluminum derivative and subject to Sec 232, do the Reciprocal Tariffs apply only on the non-metal content?

Yes. ***The non-metal content is subject to the Reciprocal Tariff.*** If the derivative product contains steel or aluminum, regardless of how much, *only the metal content is excluded from the Reciprocal Tariffs.*

## If an imported product is a steel or aluminum derivative subject to Sec 232, but does not contain any metal, do the Reciprocal Tariffs apply?

CBP has confirmed that if the derivative product **does not** contain any steel or aluminum, the imported item is subject to the Reciprocal Tariffs.

## Pharmaceuticals are in the original Annex II. Is this original Annex II list still exempt from the reciprocal tariffs?

Only the items listed in Annex II are excluded from the new reciprocal tariffs. The administration is currently planning Sec 232 actions due to the national security implications of

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manufacturing pharmaceuticals abroad. Annex II contains several items from Chapters 29 and 30 of the US HTS.

## Trade Remedies

### What about the Trade Remedies?

Trade remedies such as those items subject to Sec 201, Sec 301, IEEPA, Antidumping, and Countervailing duties still apply.

However, when Sec 232 applies, the Reciprocal Tariff (whether it be the 10% or the country-specific rate) **does not apply**.

As an example, when iron, steel, or aluminum items are being imported from China, the duties would be applied as follows:

Commodity: Iron Steel or Aluminum (C/O = CN)					
Loading Date	Normal Duties	Sec 301 (7.5 or 25%)	Sec 232 (25%)	IEEPA Fentanyl (20%)	Reciprocal Tariff
03 Apr 2025	✓	✓	✓	✓	N/A
05 Apr 2025	✓	✓	✓	✓	N/A
09 Apr 2025	✓	✓	✓	✓	N/A

**NEW:** Below is a list of the trade remedies and their applicability for reference.

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Sec 301	<ul style="list-style-type: none"> <li>• China = 7.5% or 25% based on the HTS</li> </ul>
IEEPA Fentanyl	<ul style="list-style-type: none"> <li>• Canadian or Mexican Energy Products = 10%</li> <li>• Canadian or Mexican Potash = 10%</li> <li>• China, Canada, or Mexico = 20%</li> <li>• All others no additional duty</li> </ul>
Sec 232 - Iron, Steel or Aluminum	<ul style="list-style-type: none"> <li>• Russian Aluminum = 200%</li> <li>• Iron, Steel and/or Aluminum items in Ch. 72, 73 and 76 = 50%</li> <li>• Steel or aluminum components smelted &amp; cast in the US = 50%</li> <li>• Steel and aluminum derivatives identified outside of Ch. 72, 73, and 76 = 50% on the steel or aluminum content</li> <li>• Non-steel or non-aluminum portion of the derivatives subject to Reciprocal Tariff rates</li> </ul>
Sec 232 - Copper	<ul style="list-style-type: none"> <li>• Copper derivatives - 50%</li> <li>• Non-copper portion of copper derivatives subject to Reciprocal Tariff rates</li> </ul>
Sec 232 - Auto or Auto Parts	<ul style="list-style-type: none"> <li>• Automobiles or parts identified = 25%</li> <li>• Non-US content in USMCA-qualifying automobiles or parts = 25%</li> </ul>
IEEPA Reciprocal	<ul style="list-style-type: none"> <li>• Items subject to Sec 232 = country-specific rate on the portion not subject to Sec 232</li> <li>• USMCA-eligible products = no additional duty</li> <li>• Items listed in Annex II = no additional duty</li> <li>• North Korea, Cuba, Russia and Belarus = no additional duty</li> <li>• Humanitarian &amp; Informational goods = no additional duty</li> <li>• China, Hong Kong &amp; Macau = 10% (14 May through 12 Aug 2025)</li> <li>• Canada (Non-USMCA) = 35%</li> <li>• Mexico (Non-USMCA) = 25%</li> <li>• United Kingdom (UK) = 10%*</li> <li>• Country-specific - as indicated on pages 1-2</li> <li>• All other = 10%</li> </ul>

### Are these new tariffs on top of the existing tariffs?

The new tariffs are levied in addition to the existing normal tariffs. A few examples are below for reference:

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Commodity: Women's Blouse (C/O = CN)						
Loading Date	Normal Duties	Sec 301	Sec 232	Fentanyl	Reciprocal Tariff	Total Duty
03 Apr 2025	✓ 16%	✓ 7.5%	N/A	✓ 20%	N/A	43.5%
05 Apr 2025	✓ 16%	✓ 7.5%	N/A	✓ 20%	✓ 10%	53.5%
09 Apr 2025	✓ 16%	✓ 7.5%	N/A	✓ 20%	✓ 84%	127.5%
10 Apr 2025	✓ 16%	✓ 7.5%	N/A	✓ 20%	✓ 125%	168.5%
14 May 2025	✓ 16%	✓ 7.5%	N/A	✓ 20%	✓ 10%	53.5%

Commodity: Iron Rivets (C/O = VN)						
Loading Date	Normal Duties	Sec 301	Sec 232	Fentanyl	Reciprocal Tariff	Total Duty
03 Apr 2025	✓ Free	✓ 25%	✓ 25%	N/A	N/A	50%
05 Apr 2025	✓ Free	✓ 25%	✓ 25%	N/A	N/A	50%
09 Apr 2025	✓ Free	✓ 25%	✓ 25%	N/A	N/A	50%
10 Apr 2025	✓ Free	✓ 25%	✓ 25%	N/A	N/A	50%

Commodity: Sparkling Cider (C/O = FR)						
Loading Date	Normal Duties	Sec 301	Sec 232	Fentanyl	Reciprocal Tariff	Total Duty
03 Apr 2025	✓ 0.4¢ / liter	N/A	N/A	N/A	N/A	0.4¢ / liter*
05 Apr 2025	✓ 0.4¢ / liter	N/A	N/A	N/A	✓ 10%	10% + 0.4¢ / liter*
09 Apr 2025	✓ 0.4¢ / liter	N/A	N/A	N/A	✓ 10%	10% + 0.4¢ / liter*
10 Apr 2025	✓ 0.4¢ / liter	N/A	N/A	N/A	✓ 10%	10% + 0.4¢ / liter*

\*This duty rate does include the Internal Revenue Tax

Commodity: Frozen Beef Out of Quota (C/O = BR)						
Loading Date	Normal Duties	Sec 301	Sec 232	Fentanyl	Reciprocal Tariff	Total Duty
03 Apr 2025	✓ 26.4%	N/A	N/A	N/A	N/A	26.4%
05 Apr 2025	✓ 26.4%	N/A	N/A	N/A	✓ 10%	36.4%
09 Apr 2025	✓ 26.4%	N/A	N/A	N/A	✓ 10%	36.4%
10 Apr 2025	✓ 26.4%	N/A	N/A	N/A	✓ 10%	36.4%



Commodity: Fresh Mangoes (C/O = IN)						
Loading Date	Normal Duties	Sec 301	Sec 232	Fentanyl	Reciprocal Tariff	Total Duty
03 Apr 2025	✓ 6.6¢ / kg	N/A	N/A	N/A	N/A	6.6¢ per kg
05 Apr 2025	✓ 6.6¢ / kg	N/A	N/A	N/A	✓ 10%	10% + 6.6¢ per kg
09 Apr 2025	✓ 6.6¢ / kg	N/A	N/A	N/A	✓ 26%	36% + 6.6¢ per kg
10 Apr 2025	✓ 6.6¢ / kg	N/A	N/A	N/A	✓ 10%	10% + 6.6¢ per kg

### CBP issued a notification about the unstacking of tariffs. Please explain how this works.

On May 20, 2025, CBP published a [Federal Register](#) notice eliminating the compounding or “stacking” of certain overlapping tariffs that were imposed under various trade remedies.

The “unstacking” is effective as of May 16, 2025.

Trade Remedy	Auto	232 Alum	232 Steel	IEEPA Can	IEEPA Mex	IEEPA China	Sec 301	IEEPA Reciprocal
Sec 232 Auto / Auto Parts		⊘	⊘	⊘	⊘	✓	✓	⊘
Sec 232 Aluminum	⊘		✓	⊘	⊘	✓	✓	⊘
Sec 232 Steel	⊘	✓		⊘	⊘	✓	✓	⊘
IEEPA Fentanyl – Canada	⊘	⊘	⊘		N/A	N/A	N/A	N/A
IEEPA Fentanyl – Mexico	⊘	⊘	⊘	N/A		N/A	N/A	N/A
IEEPA Fentanyl – China	✓	✓	✓	N/A	N/A		✓	N/A
Sec 301 – China	⊘	✓	✓	N/A	N/A	✓		✓
IEEPA Reciprocal Tariffs	✓	⊘	⊘	N/A	N/A	N/A	✓	

N/A = not applicable.

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## Free Trade Agreements and Chapter 98

### How will Free Trade Agreements (FTA) work with these supplemental duties?

Those programs will still apply to standard duties if imported goods qualify for a Free Trade Agreement or a Reduced Duty program. However, the Reciprocal Tariff (either the 10% universal or the country-specific rate) and any other trade remedies will also apply.

For example, Australian Beef (under HTS 0202.30.50.85 / 4.4¢ / kg) eligible for the US-Australia Free Trade Agreement will be duty-free under the FTA, but the shipment will still incur the 10% reciprocal tariff.

Commodity	AU-US FTA	HTS	Duty Rate	Reciprocal Tariff	Total Duty
Frozen Beef out of Quota	✓ AU	0202.30.5085	Free	✓ 10%	10%

*Example of FTA-eligible goods*

### Are Government Contract shipments, or other items under Chapter 98, exempt from the reciprocal tariffs?

In Annex III of the Executive Order, goods claimed under a provision in Chapter 98, such as government contract goods under **9808.00.3030**, are exempt from the reciprocal tariffs.

However, goods entered under headings 9802.00.40, 9802.00.50, 9802.00.60, and 9802.00.80 have special considerations to be considered.

For subheadings **9802.00.40**, **9802.00.50**, and **9802.00.60**, the additional duties apply to the value of repairs, alterations, or processing performed, as described in the applicable subheading.

For heading **9802.00.80**, the additional duties apply to the value of the article assembled abroad, less the cost or value of such products of the United States, as described.

## Drawback, FTZs, and Warehouse Entries

### Are these supplemental duties eligible for Drawback?

A drawback may be claimed to recover additional duties paid for these reciprocal tariffs. Additional trade remedies may not be eligible.

Trade Remedy	Eligible for Drawback
Section 232	✗
Section 301 (China)	✓
IEEPA Fentanyl	✗
IEEPA Reciprocal Tariffs	✓
IEEPA Russian Oil Tariffs	✓

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## What is the duty effect if goods are moved to a Foreign Trade Zone (FTZ)?

As with all other trade remedies, goods admitted into an FTZ as of 12:01 AM EST on 09 Apr 2025 must be entered under **Privileged Foreign Status** at the time of entry into the US FTZ.

Entering goods into an FTZ under **Privileged Foreign Status** at the time of entry means that when the goods are removed from the FTZ, whatever duties are in place at the time of entry will be applicable.

**Note:** once goods are entered as **Privileged Foreign Status** at the time of entry, *this status cannot be changed*.

## Would the Reciprocal Tariffs apply if the goods entered a Bonded Warehouse?

Goods placed in a bonded warehouse are initially exempt from duties, with only the Harbor Maintenance Fee (HMF) applicable for sea freight.

Upon withdrawal, the current duty rates will apply. Therefore, if goods are stored in a bonded warehouse during the Reciprocal Tariffs period but withdrawn after these tariffs are rescinded, the Reciprocal Tariffs will not apply.

If, however, the goods entered a bonded warehouse during the in-transit clause, if withdrawn for consumption prior to 27 May 2025, they will be excluded from the 10% Reciprocal Tariffs (or the appropriate China-specific rate).

## World and US Response to the Tariffs

### Has the world responded to the US Reciprocal Tariffs?

As of 09 Apr 2025, China has responded to the increase from 34% to 84% to 125% with their retaliatory increase to 125% tariffs on US goods. They have also indicated that they will not raise their tariffs any further.

Likewise, the European Union has responded to the Sec 232 tariffs by levying a 25% tariff on certain US goods; however, this has been paused due to the recent announcement of a 90-day pause by the US.

Countries like Israel have initiated discussions with the White House to negotiate reductions in their country-specific tariffs, but these efforts have not led to any tariff reductions on their imported goods.

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## Will the IEEPA Reciprocal Tariffs stand up to legal scrutiny?

On April 23, 2025, twelve states (Oregon, Arizona, Colorado, Connecticut, Delaware, Illinois, Maine, Minnesota, Nevada, New Mexico, New York, and Vermont) filed a lawsuit against the current administration in the Court of International Trade, challenging the legality of Reciprocal Tariffs under the International Emergency Economic Powers Act. This follows a similar lawsuit filed by California on April 17, 2025, in Federal Court.

### Key Points:

- **Lawsuits:** Both lawsuits argue that Article 1, Section 8 of the US Constitution grants Congress the power to levy tariffs, and the President's use of Executive Orders to implement tariffs breaches the separation of powers.
- **Sec 232:** Provides the President authority to raise tariffs on imports deemed a threat to national security without congressional approval.
- **IEEPA:** Authorizes the President to regulate international commerce after declaring a national emergency in response to unusual and extraordinary threats. The lawsuits question whether trade imbalances constitute a true emergency justifying tariff increases.

On May 28, 2025, the Court of International Trade blocked the Trump Administration's IEEPA and Fentanyl tariffs - a move that was immediately appealed by the Trump Administration. The Court of Appeals approved the appeal, and the ruling was paused. The Court of Appeals has now considered the appeal and has decided to allow these tariffs to remain in place while the Administration's appeal continues to move through the legal process.

The CIT ruling was soon stayed by its reviewing court, the U.S. Court of Appeals for the Federal Circuit (Federal Circuit), keeping the tariffs at issue in place for now.

**This means the IEEPA tariffs remain in effect and are still due on shipments clearing customs into the USA right now.**

In a separate Federal lawsuit brought by two small importers, a federal judge for the District of Columbia issued a narrower ruling blocking the same tariffs but only as it applies to the plaintiffs. Likewise, the District (District of Columbia) ruling has also been stayed as the government appeals to the U.S. Court of Appeals for the District of Columbia Circuit (D.C. Circuit).

On Jul 31, 2025, the CAFC (Court of Appeals Federal Circuit) listened to oral arguments from all parties, and a decision from the court is pending.

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## CHANGE HISTORY

REVISION	DATE	MODIFICATION DESCRIPTION/PARAGRAPH NUMBER
1.0	Apr 3, 2025	Initial Document
1.1	Apr 11, 2025	<ul style="list-style-type: none"> <li>Added new information about the Apr 9, 2025, Executive Order delaying the implementation of the country-specific rates.</li> <li>Update the statement regarding the country-specific rates.</li> <li>Updated the response to the effective date, adding the new effective date due to the 90-day suspension, and clarified the "on-the-water provisions".</li> <li>Added question defining Column 2 countries and the effect of being added here.</li> <li>Added questions regarding items subject to Sec 232 on Iron, Steel, and Aluminum that contain zero metals and the reciprocal tariff applicability.</li> <li>Added a question regarding the pharmaceutical carve-out.</li> <li>Added a question to illustrate the current China duty rate.</li> <li>Updated examples to illustrate the change from 34% to 84% to 125% for the reciprocal tariff on China and added line effective 10 Apr 2025.</li> <li>Removed the reference to 34% for China on the question regarding SARs.</li> <li>Updated the question on Drawback to confirm that reciprocal tariffs may be eligible for drawback claims.</li> <li>Removed reference to domestic status when goods are admitted to an FTZ.</li> <li>Added a question about moving the cargo to a bonded warehouse to defer duty payment.</li> <li>Added a question about retaliatory measures by other countries.</li> </ul>
1.2	Apr 21, 2025	<ul style="list-style-type: none"> <li>Added a table to illustrate the rates for Canada and Mexico</li> <li>Migrated the exclusions from the Reciprocal Tariffs into a table form from a list.</li> <li>Added Medium &amp; Heavy-Duty Trucks and their parts to the list of items under a Sec 232 investigation.</li> <li>Added a question with a response detailing all the current trade remedies.</li> <li>Added example of Frozen Boneless Beef to demonstrate the effect of a Free Trade Agreement on the duty calculation of goods subject to the reciprocal tariff.</li> <li>Added a note to the FTZ question clarifying that the status cannot be changed from <i>Privileged Foreign</i> to <i>Non-Privileged Foreign</i>.</li> <li>Added question regarding the legality of the IEEPA Reciprocal Tariffs.</li> </ul>
1.3	May 5, 2025	<ul style="list-style-type: none"> <li>Updated the question as to when the tariffs take effect by including a table provided by CBP detailing when to apply the in-transit provision.</li> <li>Updated the link to the Annex II exclusions to include the Auto and Auto parts HTS.</li> <li>Added a question on whether a steel or aluminum item with an exclusion is exempt from the reciprocal tariffs.</li> <li>Added a question to clarify if the Reciprocal Tariff applies to the entire steel or aluminum derivative or only the metal content.</li> <li>Added a question to clarify if the Reciprocal Tariff applies to a steel or aluminum derivative with no steel or aluminum content.</li> <li>Updated the Drawback question to add the trade remedies eligible for drawback claims</li> <li>Updated the question regarding Bonded Warehouses to include the in-transit clause provision.</li> <li>Updated the answer on the legality of the IEEPA Reciprocal Tariffs</li> </ul>
1.3	May 19, 2025	<ul style="list-style-type: none"> <li>Added a question about the new IEEPA India supplemental duty of 25%.</li> <li>Updated the question about cargo that does not ship directly to the US (i.e., stopping in one or more ports along the way to the US).</li> </ul>

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		<ul style="list-style-type: none"> <li>Updated the link to the Annex II exclusions to include the Auto and Auto parts HTS.</li> <li>Added a question about the US-UK Trade Agreement announced on 08 May 2025.</li> <li>Added a question about the effect of an In-bond move on the reciprocal tariff.</li> <li>Updated the rates for the current China Reciprocal Tariff based on the 90-day reduction by the administration.</li> </ul>
1.5	Jun 24, 2025	<ul style="list-style-type: none"> <li>Added appliances and their parts to the list of Sec 232 derivatives as per the announcement by the administration on Jun 20, 2025.</li> <li>Added a link for the Steel and Aluminum Tariffs.</li> <li>Corrected the question about reciprocal tariff applicability for derivatives to indicate that the non-metal (steel or aluminum) portion is now subject to reciprocal tariffs based on a clarification by CBP.</li> <li>Added a question and matrix on the unstacking of tariffs.</li> <li>Added an update on the lawsuit against the administration.</li> </ul>
2.0	Aug 1, 2025	<ul style="list-style-type: none"> <li>Updated country specific rates effective Aug 7, 2025, and included the new link to the new Executive Order</li> <li>Updated the Canada (35%) and Mexico rates.</li> <li>Added a question regarding the new Brazil rates.</li> <li>Added a question explaining the EU rates.</li> <li>Moved the question about the US-UK Economic Prosperity Deal up after the question about the EU tariffs.</li> <li>Updated the effective date of the tariffs.</li> <li>Broke up the in-transit provision into two questions.</li> <li>Moved Copper from <i>Pending Sec 232 Investigations</i> to <i>Items Subject to Sec 232</i>.</li> <li>Added a link to the Steel &amp; Aluminum tariffs with Copper Tariffs added</li> </ul>
2.1	Aug 11, 2025	<ul style="list-style-type: none"> <li>Moved the section on China up to the beginning of the document. <ul style="list-style-type: none"> <li>Updated China section to include the new 90-day extension through Nov 2025.</li> </ul> </li> <li>Added questions regarding the new rates for India</li> <li>Added titles for Canada &amp; Mexico, Brazil, the EU, UK, and India</li> <li>Updated the section on Trade Remedies – modifying the following items within the Reciprocal Tariff portion: <ul style="list-style-type: none"> <li>Items subject to Sec 232 – the non-Sec 232 portion is now subject to the Reciprocal Tariff</li> <li>Split Canada and Mexico (non-USMCA) rates into two. Canada is 35% and Mexico still 25%</li> </ul> </li> </ul>

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