

# AUGUST 1 TARIFF RATE CHANGES, COUNTRY TRADE DEALS, COPPER TARIFFS, AND DE MINIMIS SUSPENSION (July 31, 2025)

As the end of the temporary 10% IEEPA Reciprocal Tariffs arrives today for many countries, President Trump has announced a series of trade deals, new duties on goods from Brazil, new duties on copper products, and the suspension of the Section 321 De Minimis exemption. It is extremely important for importers to note that most of the trade deal announcements do not contain specific information on their implementation date, so it is unclear whether they go into effect at 12:01 am Eastern Daylight Time (EDT) on August 1 or at a later date (with continued application of the 10% IEEPA Reciprocal Tariff rate or an interim reversion to the previously-announced higher country-specific rates). Customs should be issuing CSMS administrative messages later today that provide clarity on the effective dates of these changes. This current lack of detail, as well as the likelihood that some tariff rates will go up while others go down or do not change, makes it difficult for importers to determine the best Customs entry strategy.

## **COUNTRY-SPECIFIC TRADE DEALS**

Country-specific trade deals or IEEPA Reciprocal Tariff treatments have been announced with the following countries:

- <u>European Union</u> On July 28, the U.S. and the E.U. <u>agreed</u> to a deal imposing a 15% reciprocal tariff on goods imported from the E.U., including auto parts, pharmaceuticals, and semiconductors. However, the 50% Section 232 additional tariffs on steel, aluminum, and copper will remain in effect. The E.U. has also agreed to invest \$600 billion in the U.S. over the President's term, buy \$750 billion in U.S. energy exports through 2028, and reduce non-tariff barriers on U.S. industrial and agricultural products.
- <u>Indonesia</u> On July 22, the U.S. and Indonesia <u>agreed</u> to a deal imposing a 19% reciprocal tariff on Indonesian goods. Indonesia agreed to reduce nontariff barriers, including accepting U.S. regulatory standards and certifications on many products, including: emission and safety standards for vehicles, medical devices and pharmaceuticals, and agricultural products.
- <u>Japan</u> On July 23, the U.S. and Japan <u>agreed</u> to a deal imposing a 15% reciprocal tariff on goods imported from Japan. Japan agreed to invest \$550 billion in the U.S. and increase access to Japanese markets for U.S. producers in agriculture, energy, aerospace, defense, automobiles, and industrial and consumer goods.
- Mexico President Trump threatened to raise the tariff rate on Mexican goods to 30%, but announced on July 31 that existing additional tariffs on Mexican goods (IEEPA Fentanyl Tariffs, Section 232 auto, and Section 232 steel, aluminum, and copper tariffs) will not be increased for 90 days while the countries negotiate a trade deal.
- <u>Pakistan</u> On July 31, the U.S. and Pakistan agreed on a new trade deal. The details are unclear, including the new reciprocal tariff on Pakistani products imported into the U.S., but a 29% duty was threatened in April. The U.S. will help Pakistan exploit its oil reserves. No official documents have

- been released.
- <u>Philippines</u> On July 22, the U.S. and the Philippines agreed to a trade deal imposing a 19% reciprocal tariff on Philippine-origin imports and U.S. products will face zero tariffs in the Philippines. The deal was announced alongside new pledges to deepen military cooperation against China. No official documents have been released.
- <u>South Korea</u> The President announced on July 30 that a 15% reciprocal tariff will be imposed on imports of South Korean origin products. It also stated that South Korea will "give" the United States \$350 billion for "Investments owned and controlled by the United States, and selected by myself, as President." Finally, South Korea has reportedly agreed to purchase \$100 billion of U.S. Liquified Natural Gas (LNG) or other energy products.
- <u>Vietnam</u> On July 2, President Trump announced an agreement with Vietnam where Vietnamese goods entering the U.S. are subject to 20% reciprocal tariffs and "transshipped" goods are subject to 40% tariffs. No official documents have been released.
- <u>United Kingdom</u> On June 16, the U.S. and the U.K. <u>agreed</u> to a deal imposing a 7.5% reciprocal tariff on the first 100,000 U.K. vehicles imported into the U.S. per year, and 25% per vehicle after that. Auto parts will be subject to a tariff rate of 10%. Certain U.K. aerospace products are entered duty-free. For steel and aluminum products and derivatives, the U.S. and the U.K. will determine tariff-rate quotas on steel and aluminum products.
- India On July 30, President Trump stated that a 25% reciprocal tariff will be imposed on Indian-origin goods plus an unspecified "penalty" because India has purchased large quantities of Russian energy and military equipment. No official documents have been released.

More trade deals may be announced before the end of the day. Of note, no deal has yet been announced with China or Canada.

While President Trump has announced many of these trade deals through social media and the White House has issued Fact Sheets on some of them, important details such as effective dates are not yet known and some of the countries to these deals have provided different interpretations of the terms of their deal.

## **BRAZIL DUTIES**

A July 30 Executive Order imposes new 40% duties on imports from Brazil based on the President's authority under the International Emergency Economic Powers Act (IEEPA). These 40% duties are on all products, except for: (1) goods exempt under 50 U.S.C. 1702(b), (2) goods listed on Annex I to the Order, and (3) goods subject to existing and future Section 232 actions, including steel, aluminum, automobiles and auto parts, and copper. Annex I is a long list of 694 HTSUS classifications that includes some substantial Brazilian imports into the United States such as orange juice, silicon metal, certain irons and ores, coal, oils, fuels, and fertilizers (129 HTSUS classifications), and civil aircraft and certain civil aircraft parts and components.

These duties go into effect at 12:01 am EDT on August 6, 2025, except for goods that (1) were loaded onto a vessel at the port of loading and in transit on the final mode of transit prior to entry into the United States, before these duties come into effect; and (2) are entered for consumption, or withdrawn from warehouse for consumption before 12:01 am EDT on October 5, 2025. FTZs are excluded from the in-transit provision.

Except for Section 232 tariffs, these duties are cumulative with all other duties, including the Reciprocal Tariffs imposed on Brazilian goods, for a total additional tariff of 50% on products of Brazil.

Goods admitted into an FTZ that are subject to these duties must be admitted in Privileged Foreign (PF) status.

#### **COPPER SECTION 232 DUTIES**

The <u>Presidential Proclamation</u> imposes 50% Section 232 tariffs on all imports of semi-finished copper products and intensive copper derivative products that will be named in an Annex that has not yet been published. However, today CBP issued CSMS #65794272, which includes 80 HTSUS classifications covering bars, rods, wire, sheets, foil, tubes, pipes, pipe fittings, screws, washers, table, kitchen and sanitary ware, and insulated wire and cable, among others. These duties go into effect on 12:01 am EDT on August 1, 2025. The 50% Section 232 tariffs do not apply to copper raw inputs (cathodes, ores, concentrates, scraps) and only apply to the copper content of the articles subject to this order. The non-copper content of these articles is subject to IEEPA Reciprocal Tariffs and any other applicable duties. Within 90 days the Secretary of Commerce will establish a process for the inclusion of additional derivative copper products, similar to the Section 232 steel and aluminum tariff inclusion process. Duty drawback is not available.

By June 30, 2026, the Commerce Secretary shall provide the President with an update on domestic copper markets so that the President may determine whether to impose a duty on refined copper of 15% starting on January 1, 2027, and 30% starting on January 1, 2028.

The Proclamation also authorizes the Commerce Secretary to take steps under the Defense Production Act to require certain amounts of "high-quality" copper scrap produced in the United States to be sold in the United States. More details are found in the related <u>Fact Sheet</u> that recommends creating an export licensing regime for this scrap with increasing domestic sale requirements starting at 25% in 2027, increasing to 30% in 2028, and 40% in 2029.

### SUSPENSION OF DE MINIMIS EXEMPTION

The Executive Order suspends the duty exemption for shipments under \$800 as of 12:01 am EDT on August 29. The EO bases the suspension on the President's authority under IEEPA.

The EO imposes a structure of duty rates based on the IEEPA Reciprocal Tariff rate of the country of origin:

For postal items (packages) containing goods entered for consumption, the duty is equal to the effective IEEPA tariff rate applicable to the country of origin of the product.

For other items, the duty shall be based on the effective IEEPA tariff rate applicable to the country of origin of the product as follows:

- (i) Countries with an effective IEEPA tariff rate of less than 16 percent: \$80 per item;
- (ii) Countries with an effective IEEPA tariff rate between 16 and 25 percent (inclusive): \$160 per item; and
- (iii) Countries with an effective IEEPA rate above 25 percent: \$200 per item.

All shipments sent through the international postal network that are subject to ADD, CVD, or quota must be entered under the appropriate entry type.

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This communication provides only a summary of the many issues and requirements included in these announcements. Clients should read and consider the source documents. Additionally, as previously noted, many very important details are not yet known. Customs should be issuing CSMS messages that provide critically important details on the Customs implementation of these changes. Please contact Marshall Miller, Brian Murphy, Sean Murray, or David Ostheimer with questions.

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