



CHINA TARIFFS UNCERTAINTY

Last week, in advance of an expected meeting between President Trump and Chinese President Xi where a U.S.-China trade agreement may have been announced, the Chinese announced further export restrictions on rare earth minerals and port fees on U.S. ships. President Trump responded by threatening cancellation of the meeting, a 100% tariff on Chinese products, and other trade actions, but has also made more conciliatory statements.

232 STEEL/ALUMINUM

The Commerce Department has posted 90 Section 232 tariff inclusion requests to add 691 unique 8-digit or 10-digit HTSUS tariff classifications to the Section 232 duties on steel and aluminum derivative articles. Products include duty-free agricultural machinery in HTSUS subheading 9817.00.50, hand tools, engine and auto parts, beverages, cookware, canned fruits, compressors, electric storage battery parts, insulated wires and cables, motorcycles, bicycles and parts, etc. Clients can contact [Brenda Zeller](#) for the Firm's spreadsheet of the identified HTSUS classifications and associated tariff inclusion requests. There is only a short comment period, with comments due by October 21. See our What's New [update](#). Contact [Brian Murphy](#) or [Sean Murray](#) for assistance with comments. 90 Fed. Reg. [44799](#) (Sept. 17, 2025).

U.S.-JAPAN AGREEMENT

The U.S. International Trade Administration (ITA) has published a Notice on the changes to the HTSUS to implement tariff-related aspects of the U.S.-Japan agreement. The Notice includes the new HTSUS Chapter 99 classifications for subject articles. CBP has issued an administrative message with guidance on the application of the modified duty rates, HTSUS sequencing on entries, and application of Section 232 duties. 90 Fed. Reg. [44638](#) (Sept. 16, 2025); CSMS [#66242844](#) (Sept. 15, 2025).

U.S.-EU AGREEMENT

On September 25, the ITA and the U.S. Trade Representative (USTR) issued guidance on implementation of tariff-related aspects of the U.S.-EU trade agreement. The Notice includes an annex of HTSUS

2025 FIRM SEMINARS

We will be offering the following Fall training seminars in-person at our Kansas City office:

Import/Export 101 – November 5
Import/Export 201 – November 6

These seminars will include sessions on the additional tariffs. More detailed information is posted on our [website](#). Please contact [Shari Rees](#) with questions. Seminars are offered to Miller & Company clients only.

FTZ BOARD SHUTDOWN

With the Federal government shut down, the Foreign-Trade Zone (FTZ) Board is closed and is currently not reviewing or responding to any requests or filings.

FTZ BOARD DECISIONS

- The FTZ Board has approved limited production authority for a semi-conductor wafer manufacturing operation. 90 Fed. Reg. [48022](#) (Oct. 3, 2025).
- The FTZ Board has denied a Foreign-Trade Subzone application for Ryder Integrated Logistics in Hope Hull, Alabama. The FTZ Board determined that the application did not meet the criteria for approval, but it is unclear what criteria was not met. 90 Fed. Reg. [45372](#) (Sept. 22, 2025).

REPLACEMENT DUTY FILINGS

CBP has provided updated guidance on filing replacement Chapter 99 HTSUS duty classifications for imports from the EU, Japan, and the United Kingdom. Unless drawback will be claimed, importers should use the correct classification to align with the 15% total duty rate. Importers who reported an incorrect total duty amount should file Post Summary Corrections (PSCs). CSMS [#66319804](#) (Sept. 23, 2025).

IEEPA LITIGATION

The U.S. Supreme Court has [scheduled](#) oral arguments for November 5 in the actions challenging the imposition of IEEPA reciprocal and fentanyl tariffs. Multiple briefs have already been filed in the [VOS](#) and [Learning Resources](#) court dockets.

301 LITIGATION DECISION

On September 25, the U.S. Court of Appeals for the Federal Circuit

BIS 50% RULE

On September 30, the Bureau of Industry and Security (BIS) issued an Interim Final Rule to expand controls over affiliates of certain listed entities. Under the new rule, any entity owned 50% or more by an entity or entities on the BIS Entity List or Military End-User (MEU) List is also subject to the restrictions. This new rule is based on the long-standing Office of Foreign Assets Control (OFAC) "50% Rule" and requires a substantial increase in exporter due diligence. Contact [Sean Murray](#) with questions. 90 Fed. Reg. [47201](#) (Sept. 30, 2025).

232 WOOD PRODUCTS

Effective October 14, Presidential Proclamation 10976 imposed Section 232 duties of 10% on softwood timber and lumber and 25% duties on certain upholstered wooden furniture, kitchen cabinets, and vanities. Duty rates for affected UK products will not exceed 10% and EU and Japan products will not exceed 15% when added to the NTR tariff rate. On January 1, 2026, the Section 232 duties will rise to 30% for upholstered wooden furniture and 50% for kitchen cabinets and vanities. See our What's New [update](#). 90 Fed. Reg. [48127](#) (Oct. 6, 2025), CSMS [#66492057](#) (Oct. 10, 2025).

USMCA JOINT REVIEW

USTR has published a notice of public hearing and request for comments in advance of the joint review of USMCA between the United States, Mexico, and Canada that begins on July 1, 2026. USTR will hold a public hearing on November 17. Comments and requests to appear at the hearing must be submitted by November 3. [Mexico](#) and [Canada](#) have issued similar notices for public input. 90 Fed. Reg. [44869](#) (Sept. 17, 2025).

301 VESSEL FEES

- On October 10, USTR issued a [Notice](#) announcing modifications to some Section 301 vessel fees and imposing 100% tariffs on certain cranes and cargo handling equipment. USTR also proposed fee exemptions for ethane and LPG carriers and 150% tariffs on certain cargo handling equipment. Comments on the proposed changes are due by November 10.
- CBP issued an administrative

classifications exempt from the Reciprocal tariffs, the HTSUS Chapter 99 tariff classifications to use, and guidance on the HTSUS treatment of passenger vehicles, light trucks, auto parts, civil aircraft, aircraft parts, and non-patented pharmaceuticals for use in pharmaceutical applications. See our September 25 [What's New](#) for additional details. Contact [Sean Murray](#) or [Brian Murphy](#) with questions. 90 Fed. Reg. [46136](#) (Sept. 25, 2025).

TRADE BARRIER COMMENTS

The USTR has requested comments on foreign trade barriers to U.S. exports of goods and services and foreign investments for its annual National Trade Estimate Report on Foreign Trade Barriers. Comments are due by October 30. 90 Fed. Reg. [44448](#) (Sept. 15, 2025).

QUARTZ COUNTERTOP 201

The Quartz Manufacturing Alliance of America has [petitioned](#) the U.S. International Trade Commission (ITC) for safeguards relief under Section 201 of the Trade Act of 1974. Under Section 201, domestic industry harmed by increased imports can receive temporary assistance. This could lead to increased duties on imported quartz countertops

232 FILMS

- On September 29, President Trump threatened to impose 100% tariffs on films made outside the U.S.
- On September 30, USTR Jamieson Greer stated during a Fox News interview that his office would initiate an investigation into foreign films. Mr. Greer stated that these investigations would look for unfair practices, including foreign government quotas on U.S. films.

IN-BOND ARRIVAL LIABILITY

CBP ports have noted QP 7512 in-bonds not being properly "arrived" at the U.S. port of destination. The party whose bond is obligated on the transportation entry is responsible for ensuring the "arrival" and exportation of the QP 7512 in-bond and is potentially liable for penalties.

OUTBOUND CARGO DECS

After December 1, CBP will no longer accept Document Image System (DIS) images of CBP Form 1302A used in outbound cargo declarations. Carriers and vessel agents will need to use the Electronic Export Manifest (EEM) or a hard copy of CBP Form 1302A. CSMS [#66355286](#) (Oct. 1, 2025).

(CAFC) upheld President Trump's 2018 imposition of China Section 301 Lists 3 and 4A duties. The CAFC reasoned that the tariffs were authorized by the Trade Act of 1974 and did not violate the Administrative Procedure Act (APA). Contact [Sean Murray](#) or [Brian Murphy](#) with questions. [HMTX Industries LLC et al v. U.S. et al](#) (1:20-cv-00177).

NEW ACE BOND REPORTING

On September 25, CBP deployed an ACE enhancement to enable reporting of bond amounts up to 10 digits. CSMS [#66285915](#) (Sept. 19, 2025).

CHICAGO MDRS AND LOSSES

Chicago CBP has issued a [reminder](#) to importers of their responsibility to report manifest discrepancies and provided a template Manifest Discrepancy Report (MDR). Chicago CBP also issued a [notice](#) reminding importers of their responsibility to report casualties, losses, and thefts of any cargo under a customs bond.

ACE REFUND UPDATE

As of September 30, CBP has made the availability of electronic refunds by the Automated Clearinghouse (ACH) more accessible. Importers can now use the ACH Refund Authorization tab in the ACE Portal for faster processing than submitting the Refunds Enrollment Form via email. 90 Fed. Reg. [45956](#) (Sept. 24, 2025).

232 ROBOTICS & MACHINERY

The Secretary of Commerce has initiated a Section 232 investigation to determine the effects on national security of imports of robotics and industrial machinery. The investigation includes, among other things, robots and programmable, computer-controlled mechanical systems including CNC machining centers, turning and milling machines, grinding and deburring equipment, industrial stamping and pressing machines, automatic tool changers, jigs and fixtures, and machine tools for cutting, welding, and handling work pieces. Comments are due by October 17. 90 Fed. Reg. [46382](#) (Sept. 26, 2025).

MANIFEST REJECTIONS

As of September 27, ACE has an automated rejection of ACE Manifest filings that have insufficient cargo descriptions, consignee information, or shipper information. CSMS [#66383734](#) (Sept. 29, 2025).

message reminding vessel operators that they are responsible for determining the applicable vessel fees. CSMS [#66427144](#) (Oct. 3, 2025).

ENTRY LIMIT INCREASE

CBP has increased the maximum number of Entry Summaries on an ACE statement from 2,000 to 9,999. CSMS [#66324213](#) (Sept. 23, 2025).

CTPAT PROPOSED CHANGES

On October 2, CBP published a Notice of an information collection for the Customs Trade Partnership Against Terrorism (CTPAT) Security and Trade Compliance programs that also includes a proposal to add date of birth and Mexican Registro Federal de Contribuyentes (RFC) as optional data elements for all CTPAT partners and provnotice of a pilot program for third-party logistics providers to participate in CTPAT. Comments are due by December 1. 90 Fed. Reg. [47786](#) (Oct. 2, 2025).

BICYCLES FORCED LABOR

On September 24, CBP issued a Withhold Release Order (WRO) against Giant Manufacturing (Giant), a bicycle manufacturer, based on information that Giant uses forced labor for the manufacture of some products. Under the WRO, CBP will detain bicycles, bicycle parts, and accessories manufactured by Giant in Taiwan. CSMS [#66320545](#) (Sept. 24, 2025).

SYRIA SANCTIONS REGS

OFAC has issued a Final Rule changing the name of the Syria-Related Sanctions Regulations to the Promoting Accountability for Assad and Regional Stabilization Sanctions Regulations. This change reflects the removal of many of the sanctions imposed on Syria after the removal of President Assad. OFAC intends to supplement these interim regulations with more comprehensive regulations. 90 Fed. Reg. [46056](#) (Sept. 25, 2025).

FTZ STATISTICS	
FOREIGN-TRADE ZONES BOARD ACTIVITY AS 10/15/2025	
	Approved
Zones	310
Subzones*	911
	Pending
Zones	3
Subzones	3

*From Fed. Reg. Notices



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