



PRODUCT ELIGIBILITY FOR POTENTIAL CHINA TARIFF MODIFICATIONS AND U.S-CHINA BOARD OF TRADE (June 5, 2026)

On June 2 the United States Trade Representative (USTR) [announced](#) the development of a process to potentially modify existing tariffs on China imports and the creation of a U.S.-China Board of Trade, a government-to-government mechanism designed to manage bilateral trade on an ongoing basis. The USTR is now seeking comments from interested parties, with submissions accepted until July 10, 2026, under docket number USTR-2026-0430. Rebuttal comments must be submitted by July 27, 2026, under docket number USTR-2026-0431. Additional details and submission instructions will be available at <https://comments.ustr.gov/s/>.

Today, the detailed [Federal Register Notice](#) was published. USTR is seeking stakeholder input in two primary areas:

- **Product Eligibility for Potential Tariff Modification**
 - What types of Chinese products, or Chinese products in particular sectors, should be considered non-sensitive in that they give rise to few, if any, issues related to economic and national security and supply chain resilience?
 - What products of China, currently subject to additional U.S. tariffs, should the United States import at lower tariff rates, such as MFN (Column 1) rates?
 - Which U.S. consumers, workers or producers would be harmed or benefit from tariff modifications?
 - Have tariffs on the product resulted in tariff inversion for the downstream finished product?
 - For the product, what is China's share of U.S. imports, and are U.S. products exported to China?

- **Establishment of a U.S.-China Board of Trade**
 - How frequently should the U.S.-China Board of Trade convene?
 - How should the U.S.-China Board of Trade assess when, and whether, to modify the composition or scope of the identified non-sensitive products?
 - What mechanism should be established to ensure the effective sharing of trade data between the two sides to allow for optimal functioning of the U.S.-China Board of Trade?

The USTR is interested in specific China product eligibility for potential tariff reduction to MFN rates, and the proposed Board of Trade would serve as a formal bilateral framework through which the United States and China could actively manage trade flows and outcomes. The initiative reflects a shift toward a more structured, ongoing mechanism for addressing long-standing concerns about trade imbalances, market access, and reciprocity.

Clients should evaluate potential impacts and consider submitting detailed public comments, either by the company or through trade associations or our firm on the identification of products for potential tariff reduction.

Please contact [Marshall Miller](#), [Brian Murphy](#), [Sean Murray](#), or [David Ostheimer](#) with questions or for assistance.

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