



122 TEMPORARY TARIFFS

Importers are reminded that the 10% Section 122 tariffs are scheduled to expire on July 24. It is widely expected that the Trump administration will announce new tariffs to replace them, such as tariffs based on the current U.S. Trade Representative (USTR) Section 301 investigations into forced labor and global excess structural capacity. However, it is currently unknown whether and when additional tariffs based on those investigations will be implemented. As a result, importers should be considering whether there may be an upcoming gap between tariff regimes that could impact Customs entries and foreign-trade zone (FTZ) admissions. Contact [Marshall Miller](#), [Brian Murphy](#), [Sean Murray](#), or [David Ostheimer](#) with questions.

IEEPA REFUNDS UPDATE

- In the continuing International Emergency Economic Powers Act (IEEPA) litigation, U.S. Customs and Border Protection (CBP) filed a [Declaration](#) on July 13 indicating that, as of July 10, 229,609 CAPE Declarations have been submitted, 24.4 million entries with IEEPA duties have passed entry-specific validations, 16.74 million entries have been liquidated or reliquidated without IEEPA duties, \$121.75 billion has been accepted in CAPE for refund processing, \$86.3 billion in refunds (duties and interest) have been disbursed, and 9,837 refunds have not been issued due to no related ACH account.
- On July 15, the U.S. Court of International Trade (CIT) issued an [Order](#) lifting the stay in a case seeking IEEPA refunds on a class basis and stating that it anticipates issuing an Order directing CBP to reliquidate certain finally liquidated entries under a procedure to be determined. Contact [Brian Murphy](#) or [Sean Murray](#) with questions.

CAPE RECON ENTRIES

CBP has deployed Phase 2 of the CAPE process for IEEPA tariff refunds, which covers Customs entries flagged for Reconciliation (Entry Types 01, 02, 06) for which the Reconciliation entry (Entry Type 09) has not been filed. Consistent

2026 FIRM SEMINARS

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

FTZ 101 – September 15
FTZ 201 – September 16

Import/Export 101 – November 4
Import/Export 201 – November 5

See our [website](#) for more detailed information. Please contact [Shari Rees](#) with questions. Seminars are offered to Miller & Company clients only.

CPSC FILING REQUIREMENTS

- On July 8, the U.S. Consumer Product Safety Commission (CPSC) implemented its Partner Government Agency (PGA) Message Set for electronic filing of Certificate of Compliance data. However, the CPSC has directed CBP not to reject entries for missing CPSC PGA Message Set data at the present time, even for Harmonized Tariff Schedule (HTS) classifications with CP1 or CP2 flags. CSMS [#69177694](#) (July 8, 2026).
- CPSC [eFiling requirements](#) apply to Customs entries out of FTZs (Entry Type 06) beginning January 8, 2027.

HTSUS UPDATE

- Clients are encouraged to review the July 1 changes in HTSUS Revision 11 for impact and necessary updates to HTSUS databases. The changes impact 310 10-digit HTSUS tariff classifications. The changes are listed in the HTSUS [Change Record](#) and are set forth in more detail in the Section 484(f) Committee [report](#). CSMS [#69111382](#) (July 1, 2026).
- The Census Bureau has [updated](#) the Schedule B and HTSUS tables in the Automated Export System (AES) to accept the [new codes](#). A 30-day grace period is being provided for use of outdated codes.

FTZ BOARD DENIALS

- The U.S. Foreign-Trade Zones Board has been requiring more information and increasing scrutiny of applications for FTZ production authority.

USMCA RENEWAL

The U.S. Trade Representative (USTR) issued a [notice](#) on July 1 that the U.S. does not agree to renew the USMCA in its current form. The agreement remains in force while the three countries continue to negotiate revisions.

AUTO/TRUCK DUTY OFFSETS

CBP has issued updated guidance on the import adjustment offset for Section 232 automobile and medium and heavy-duty vehicle parts duties. It clarifies HTSUS reporting and the portion of Section 232 duties that may be offset for Japanese, U.S., EU, Korean, and Taiwanese auto parts. CSMS [#69087399](#) (June 29, 2026).

USMCA AUTO REPORT

USTR has issued a [report](#) to Congress that reiterates its concern for stronger USMCA automotive rules of origin to further incentivize the localization of critical and emerging technologies, such as semiconductors, critical minerals, and advanced electronics and technology systems.

PSC CHANGES

Starting August 5, the National Customs Automation Program (NCAP) Post-Summary Corrections (PSC) test will implement three modifications: (1) payments for duty, tax, or fee increases based on a PSC must be submitted electronically via ACH; (2) the full amount of the duty, tax, or fee increase may be paid prior to liquidation or a bill will be issued at liquidation; and (3) PSCs will be allowed outside of the regular 300-day timeframe where liquidation was suspended beyond 300 days after the entry date and the entries have an associated basis for suspension. CBP has also clarified that interest payments on increased duties, taxes, and fees will not be accepted prior to liquidation, and interest may only be paid after CBP liquidates the entry and issues a bill for the interest owed. 91 [Fed. Reg. 41053](#) (July 6, 2026).

INACTIVE IORS

- On July 16, CBP is introducing a new "Inactive for Entry Purposes" status for Importers of Record (IOR)

with CAPE Phase 1, such flagged entries can only be unliquidated or liquidated within 80 days of the CAPE Declaration. As of July 10, Declarations covering almost 2 million Reconciliation entries have already been successfully filed. CSMS [#69035485](#) (June 23, 2026); CSMS [#69066837](#) (June 29, 2026).

CAPE ERRORS

CBP has updated CAPE Declaration error messages for Customs entries where the value is missing from the Chapter 1-97 tariff ordinal line. Importers should consider refile CAPE Declarations with such errors and filing Post-Summary Corrections (PSCs) to fix identified errors. Contact [Brian Murphy](#) with questions. CSMS [#69056483](#) (June 25, 2026).

CAPE & WAREHOUSE ENTRIES

As of July 7, Entry Types 21 and 22 warehouse entries are not accepted on CAPE Declarations for IEEPA tariff refunds. Warehouse withdrawal entries are still accepted. CSMS [#69056483](#) (June 25, 2026).

232 U.S. STEEL & ALUMINUM

The Commerce Department has requested comments by August 17 on procedures for authorizing reduced Section 232 steel and aluminum tariffs for certain Canadian and Mexican producers that commit to increasing U.S. production capacity. As set forth in Presidential Proclamation 10984, tariff relief may be available for USMCA-qualifying steel and aluminum that is melted and poured, or smelted and cast, in Canada or Mexico when tied to new investments in U.S. primary steel or primary aluminum production. Qualifying investments must support the U.S. automotive and medium- and heavy-duty vehicle supply chains. 91 Fed. Reg. [36803](#) (June 18, 2026).

232 COPPER

Beginning July 30, imports of certain copper articles in four HTSUS Heading 8544 tariff provisions from all countries of origin besides the U.S. shall report the primary country of smelt and country of cast, and may report the secondary country of smelt, on the Entry Summary. If the primary country of smelt, secondary country of smelt, and/or country of cast are not known, "OTH" (other) may be reported. CSMS [#69252300](#) (July 15, 2026).

232 AIRCRAFT

On July 9, President Trump issued a [proclamation](#), finding that imports of commercial aircraft, jet engines, and aircraft and engine parts threaten to impair U.S. national security. The Commerce Section 232 investigation cited foreign trade practices, reliance on foreign supply chains, counterfeit and quality-control concerns, and underinvestment in domestic

• The FTZ Board has denied FTZ production authority for Catalina Components to manufacture pressure relief flaps for motor vehicles. 91 Fed. Reg. [37384](#) (June 23, 2026).

• On review of an application for production authority first submitted in 2023, the FTZ Board has again denied a Phillips 66 Company request for authority to produce renewable fuel products and by-products in FTZ status. 91 Fed. Reg. [36569](#) (June 17, 2026).

• Contact [Marshall Miller](#) or [Amanda Ward](#) with questions.

FTZ DUTY DEFERRAL BILL

Sen. Tim Scott (R-SC) has [introduced](#) Senate companion legislation (S. [4793](#)) to the House's Foreign-Trade Zones Export Enhancement Act (H.R. [6792](#)). The legislation would allow products manufactured in an FTZ and then exported to Canada or Mexico that are currently subject to USMCA duty-deferral requirements to be entered duty-free under new HTSUS 9801.00.95. Contact [Marshall Miller](#) or [David Ostheimer](#) with questions.

EU TRADE DEAL

The European Parliament and Council of the European Union [approved](#) the implementation of the EU-U.S. trade agreement on June 25, and the agreement entered into force on July 1. Under the agreement, the EU eliminated duties on U.S. industrial goods and expanded market access for certain non-sensitive agricultural products, while the U.S. established a 15% tariff ceiling on most EU imports.

U.S.-UZBEKISTAN DEAL

On June 25, the U.S. and Uzbekistan [announced](#) trade commitments intended to strengthen trade and investment relations and advance negotiations on a broader trade agreement. Uzbekistan has agreed to eliminate or reduce tariffs on a range of U.S. industrial and agricultural products, while the U.S. has agreed to favorably consider Uzbek industrial and agricultural exports in future tariff actions.

AGOA, HOPE, & HELP

CBP has issued corrected guidance for requesting duty-free treatment under the African Growth and Opportunity Act (AGOA), the Haiti Hemispheric Opportunity through Partnership Encouragement Act (HOPE), and the Haiti Economic Lift Program (HELP) for entries filed during the October 1, 2025, to February 3, 2026, lapse period. Gabon has also been reinstated as an AGOA beneficiary country. CSMS [#68987884](#) (June 18, 2026).

2027 AGOA REVIEW

USTR has initiated its annual review of the eligibility of sub-Saharan African countries to receive benefits

in ACE that will CBP to automatically deactivate IOR accounts that have not filed an entry within 366 days. IORs with this status will be ineligible to transmit Cargo Releases and Entry Summaries. CSMS [#69241265](#) (July 14, 2026); CSMS [#69113360](#) (July 1, 2026).

• CBP has provided guidance for reactivating a deactivated IOR number. CSMS [#69056621](#) (June 26, 2026).

UAE EXPORTS

BIS has issued a Final Rule, effective July 10, that reduces export controls on the United Arab Emirates (UAE) by removing the UAE from Country Groups D:3 and D:4 and adding the UAE to Country Group A:5. 91 Fed. Reg. [43034](#) (July 14, 2026).

CARGO THEFT REMINDER

The CBP Dallas/Fort Worth Area Port of Entry has issued a warning of recent increases in cargo thefts, particularly around holiday weekends, and is urging Customs bonded facility operators to strengthen security measures, remain vigilant, and promptly report any unauthorized access or theft of bonded merchandise. TIN [#69044359](#) (July 2, 2026).

ANDEAN TPA IMPACT

The U.S. International Trade Commission (USITC) has initiated its biennial review of the Andean Trade Preference Act's (ATPA's) impact on U.S. industries, consumers, and drug crop eradication and crop substitution efforts in beneficiary countries. Comments are due by July 17, and the USITC is scheduled to transmit its report to Congress and the President by August 21. 91 Fed. Reg. [40584](#) (July 2, 2026).

USDA ORGANIC FLAGS

The U.S. Department of Agriculture (USDA) has issued a reminder that, effective July 1, the National Organic Program (NOP) flag changed from "AM7" (may file) to "AM8" (must file) for 29 HTSUS classifications, which could lead to entry rejects. CSMS [#69068766](#) (June 26, 2026).

FORWARDER SENTENCED

On June 24, the DOJ [announced](#) that Natasha Mazulina, a regional manager for Delex Air Cargo, was sentenced to 18 months in prison and ordered to forfeit \$77,000 in proceeds for her role in a conspiracy to export oil and gas equipment and other controlled items to Russia through third parties.

ALIBABA IMPORT PENALTY

The DOJ has [announced](#) a non-prosecution agreement with Chinese eCommerce retailer Alibaba and its U.S. payment processor, AUS Merchant Services under which they have agreed to pay \$600 million to resolve allegations that they failed

aerospace production as threats to the U.S. aerospace industry. The proclamation does not impose tariffs or quotas, but directs Commerce and USTR to negotiate with trading partners to address the identified concerns and report back within 180 days and notes that additional Section 232 measures, including tariffs, may be considered if negotiations are unsuccessful.

232 ANTHRACITE COAL

The Commerce Department has launched a Section 232 national security investigation into imports of anthracite coal and certain metallurgical coal products used in domestic steelmaking and other industrial applications. Comments are due by July 21. 91 [Fed. Reg. 41620](#) (July 7, 2026).

301 GERMAN PHARMA

On June 18, USTR announced a Section 301 investigation into whether Germany's level of payments for new pharmaceutical products is unreasonable or discriminatory and burdens or restricts U.S. commerce. Comments will be accepted until August 10 and a hearing is scheduled for September 22. 91 [Fed. Reg. 38072](#) (June 24, 2026).

under AGOA for calendar year 2027. USTR is holding a public hearing on July 23 and post-hearing comments are due July 30. 91 [Fed. Reg. 39653](#) (June 30, 2026).

FORCED LABOR WRO

On June 23, CBP issued a Withhold Release Order (WRO) on imports from two Jordanian garment manufacturers. Needle Craft Ltd. and Casual Ware Apparel are accused of using forced labor when making apparel that is imported into the U.S. CSMS #[69031301](#) (June 23, 2026).

FOREIGN PRODUCT PENALTY

German multinational Robert Bosch GmbH has reached an [agreement](#) with the Bureau of Industry and Security (BIS) to pay almost \$36.2 million, as well as pay \$3.6 million related to disgorging profits, for foreign country exports of microelectronic sensor devices and vehicle software to Huawei and affiliates on the Entity List. The devices and software were subject to U.S. jurisdiction pursuant to the Foreign Direct Product Rule, and the settlement and payments are despite Bosch filing a Voluntary Self-Disclosure (VSD).

to prevent merchants using their eCommerce platform from importing and selling illegal drugs, unapproved pharmaceuticals, pharmaceutical equipment, and related items.

MOROCCO FERTILIZER

President Trump has issued Proclamation [11038](#), authorizing the temporary duty-free importation of phosphate fertilizers from Morocco for up to eight months or until the emergency is terminated. 91 [Fed. Reg. 40855](#) (July 2, 2026).

U.S. COMPANIES SANCTIONED

On June 22, China's MOFCOM [announced](#) sanctions on 10 U.S. defense and rare earth companies in retaliation for the recent U.S. expansion of its Chinese Military Companies List.

FTZ STATISTICS FOREIGN-TRADE ZONES BOARD ACTIVITY AS 7/15/2026

		Approved
Zones		312
Subzones*		919
		Pending
Zones		3
Subzones		23

*From [Fed. Reg. Notices](#)

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