

Latest CBP Updates for IEEPA Tariffs

Silver Spring, MD, March 24, 2025 – The National Customs Brokers and Forwarders Association of America (NCBFAA), which represents more than 1,300 Regular Member companies that provide customs brokerage services to hundreds of thousands of U.S. importers – large and small, remains at the forefront of providing pertinent regulatory and operational information to our nation’s customs brokers to ensure utmost compliance with the recently announced import tariffs by the White House.

CBP Continues to Update Section 232 FAQs on Website

Customs and Border Protection (CBP) continues to update its Section 232 [frequently asked questions \(FAQs\)](#) on its website. NCBFAA Members should regularly check this page, since CBP continues to add FAQs.

The additional Section 232 questions posted include:

- What is the proper method to submit entries for products that do not contain steel or aluminum content, and are not subject to Section 232 measures, but still require the steel melt and pour and aluminum smelt and cast information to be reported?
- Can filers report a unit of measure of less than 1?
- Does CBP require an aluminum certificate of analysis to be filed at the time of entry?
- How to determine the value of aluminum or steel content for derivative products outside of CH. 76 or 73?
- How are the Section 232 duties assessed in respect to “sets” covered by the Section 232 duty?

Contact the CBP Trade Remedy Branch, as noted in the CSMS messages from yesterday, at TradeRemedy@cbp.dhs.gov, but please be sure to include specific examples (i.e. entry numbers, etc.) so that CBP has some place concrete to start their investigation into the issue. For any policy questions, please clearly note if the answers were not provided in the CSMS messages.

Please continue to send your questions to NCBFAA at customs@ncbfaa.org. We are organizing the questions that come in, and CBP knows the questions that we are submitting are experienced by multiple members of the trade community. In partnership with CBP, the NCBFAA Customs Committee leadership is doing everything in its power to get answers to our members' questions.

Guidance for Energy and Energy Resources from Canada

CBP has provided guidance on the additional duties on imports of energy and energy resources that are the products of Canada. Energy and energy resources that qualify for USMCA are not subject to the additional tariffs.



For energy and energy resources that are the product of Canada and that do not qualify for USMCA, entered for consumption, or withdrawn from warehouse for consumption, on or after 12:01 a.m. ET on March 4, the following HTSUS classification and additional duty rate applies:

9903.01.13: Imports of energy and energy resources of Canada, as defined in section 8 of Executive Order 14156 of January 20, 2025 (Declaring a National Energy Emergency) as: crude oil, natural gas, lease condensates, natural gas liquids, refined petroleum products, uranium, coal, biofuels, geothermal heat, the kinetic movement of flowing water, and critical minerals, as defined by [30 U.S.C. 1606](#) (a)(3) will be assessed an additional *ad valorem* rate of duty of 10%. Energy or energy resources of Canada, as defined by HTSUS 9903.01.13, include, but are not limited to, goods classified under the HTSUS subheadings in this [spreadsheet](#).

Importers may request a classification ruling from CBP to determine whether goods classified under other HTS classifications fall under the definition of energy and energy resources under HTS 9903.01.13. For information on requesting a CBP ruling, see [Requirements for Electronic Ruling Requests | U.S. Customs and Border Protection](#). Further questions may be addressed to Traderemedies@cbp.dhs.gov.

IEEPA Tariff Background

President Trump on Saturday, Feb. 1, issued Executive Orders, under the authority of the International Emergency Economic Powers Act (IEEPA), to impose at midnight starting Feb. 4, 25% tariffs on imports from Canada (except energy products tariffed at 10%) and Mexico, and an additional 10% on imports from China. President Trump delayed the imposition of those tariffs, except for China, to March 4, after discussions with the leaders of Mexico and Canada. By Friday, Feb. 7, the President issued an amendment to his original [executive order](#) that allows Chinese goods to use de minimis until such time as the Department of Commerce notifies the President that “adequate systems are in place to fully and expediently process and collect tariff revenue applicable.”

On Feb. 10, President Trump [announced](#) 25% tariffs on certain steel and aluminum imports entering the U.S. Those tariffs took effect on March 12. The 25% duty rate applies to previously covered steel and aluminum products and derivatives including those produced in the previously excluded countries and on the new derivatives listed in the recently published steel and aluminum Annexes.

This tariff announcement was followed on Feb. 13 by President Trump’s [announcement](#) that the White House will commence a comprehensive investigation to determine “the equivalent of a reciprocal tariff with respect to each foreign trading partner” on other countries with existing tariffs on U.S. goods. The Office of the U.S. Trade Representative (USTR) on Feb. 20 [announced](#) that it seeks comments from the public regarding reciprocal tariffs, which are due by March 11.

On March 6, the President [amended](#) his IEEPA tariffs of 25% on Mexico and Canada. The effective date is 12:01 a.m. ET, March 7. Any Mexican or Canadian origin goods that qualify for free entry under the USMCA will not be subject to the additional 25% duties. In addition, potash



from either country that does not qualify for duty free treatment under the USMCA will be subject to a 10% duty (in lieu of the 25% duty).

Keeping You Informed

NCBFAA members with questions and comments regarding IEEPA tariffs can send them to the Customs Committee at customs@ncbfaa.org.

Meanwhile, NCBFAA will continue to keep our members updated about the U.S. tariffs through the Monday Morning eBriefing and eblasts, and a dedicated [IEEPA Tariffs webpage](#) on our website.

About NCBFAA

Headquartered in Silver Spring, Maryland, the [National Customs Brokers and Forwarders Association of American \(NCBFAA\)](#) represents more than 1,300-member companies with 110,000 employees in international trade -the nation's leading freight forwarders, customs brokers, ocean transportation intermediaries (OTIs), NVOCCs and air cargo agents, serving more than 250,000 importers and exporters. Established in New York in 1897, NCBFAA is the effective national voice of the industry. Through its various committees, counsel and representatives, the Association maintains a close watch over legislative and regulatory issues that affect its members. It keeps them informed of these and other related issues through its weekly Monday Morning eBriefing, and various meetings and conferences throughout the year.

