Manufacturing Public Policy Monthly Slide Deck

Prepared by

Inside the Beltway Solutions, LLC

September 26, 2025

PMPA
PRECISION MACHINED PRODUCTS ASSOCIATION

INSIDE BELTWAY

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About Inside Beltway

- Washington-D.C.-based non-partisan lobbying, strategic consulting, and industry research firm
- Assist clients to navigate the complexity of public policy to help make informed decisions
- Represent clients before the White House, federal departments and agencies, the U.S. Congress, and other government and industry organizations

Key Services

- Lobbying and Public Policy Advocacy
- Strategic Planning
- Industry Research

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119th U.S. Congress (2025-2026)

Congressional Focus on FY26 Spending

- House passed Continuing Resolution to Nov. 21
- Senate Democrats needed to fund government
- Federal government shuts down 12:01AM Oct 1st
- Under government shutdown, Executive Branch determines which essential services remain, which employees are subject to "Reduction in Force"
- House passes National Defense Authorization Act

Regulatory Update and Administrative Actions

Federal Regulatory Agenda Released

Spring 2025 Unified Agenda of Regulatory and Deregulatory Actions

The Trump Administration's Unified Agenda of Regulatory and Deregulatory Actions (Agenda) reports on the actions administrative agencies plan to issue in the near and long term. Released by the Office of Information and Regulatory Affairs, the Agenda provides important public notice and transparency about proposed regulatory and deregulatory actions within the Executive Branch.

The Regulatory Information Service Center (RISC) was created in June 1981. The Center undertakes projects that will facilitate development of and access to information about Federal regulatory and deregulatory activities. The Center's principal publication is the Unified Agenda in coordination with the Office of Information and Regulatory Affairs. Since 1978, Federal agencies have been required by Executive orders to publish agendas of regulatory and deregulatory activities. RegInfo.gov displays editions of the Unified Agenda of Federal Regulatory and Deregulatory Actions beginning with fall 1995.

Spring 2025 Unified Agenda of Regulatory and Deregulatory Actions
Active Regulatory Actions Listed by Agency

Select Agency Submit

(Only agencies with information relevant to this report appear in the list.)

https://www.reginfo.gov/public/do/eAgendaMain

Upcoming Regulations

Spring 2025 Unified Agenda of Regulatory and Deregulatory Actions

DOL/OSHA **RIN:** 1218-AD00

Title: Lock-Out/Tag-Out Update

Recent technological advancements that employ computer-based controls of hazardous energy (e.g., mechanical, electrical, pneumatic, chemical, and radiation) conflict with the Occupational Safety and Health Administration's (OSHA) existing lock-out/tag-out (LOTO) standard. The use of these computer-based controls has become more prevalent as equipment manufacturers modernize their designs to increase productivity. Additionally, National Consensus Standards have evolved, and international approaches to the use of computer-based controls are increasingly recognized. In light of these advancements, there is a need to modernize United States regulations to better align with current technologies, ensuring improved safety effectiveness and, indirectly, potential benefits such as increased operational efficiency. OSHA issued a Request for Information (RFI) in May 2019 to understand the strengths and limitations of this new technology, as well as potential impacts on worker safety.

Action	Date
Request for Information (RFI)	05/20/2019
RFI Comment Period End	08/19/2019
NPRM	12/00/2025

https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=1218-AD00

Upcoming Regulations

Spring 2025 Unified Agenda of Regulatory and Deregulatory Actions

DOL/OSHA **RIN:** 1218-AC98

Title: Mechanical Power Presses Update

The Occupational Safety and Health Administration (OSHA) previously published an ANPRM on Mechanical Power Presses (June 2007) in which it identified several options for updating this standard, including issues related to hydraulic or pneumatic power presses and certain technological advances.

After review of the RFI comments, OSHA will limit this rulemaking to eliminating the reporting requirements for specific injuries. The agency believes these requirements create a burden on employers that does not result in significant reductions in injuries.

Action	Date
Request for Information (RFI)	07/28/2021
RFI Comment Period End	10/26/2021
Analyze Comments	07/00/2025
NPRM	04/00/2026

https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=1218-AC98

Upcoming Regulations

Spring 2025 Unified Agenda of Regulatory and Deregulatory Actions

EPA/OW **RIN:** 2040-AG44

Title: ●Final Clarifying Definition of "Waters of the United States"

The U.S. Environmental Protection Agency and the U.S. Department of the Army are undertaking a rulemaking to revise key topics of the waters of the United States" definition in light of the Supreme Court's decision in Sackett v. Environmental Protection Agency, 598 U.S. 651 (2023), including continuous surface connection," relatively permanent," and jurisdictional versus non-jurisdictional ditches. These revisions focus on clarity, simplicity and improvements that will stand the test of time.

Action	Date
NPRM	08/00/2025
Final Action	01/00/2026

https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=1218-AC98

Upcoming Regulations

Spring 2025 Unified Agenda of Regulatory and Deregulatory Actions

DOD/DARC **RIN:** 0750-AK81

Title: Assessing Contractor Implementation of Cybersecurity Requirements (DFARS Case 2019-D041)

DoD is issuing a final rule amending the Defense Federal Acquisition Regulation Supplement (DFARS) to implement the contractual requirements associated with the CMMC 2.0 Framework in order to protect against the theft of intellectual property and sensitive information from the Defense Industrial Base (DIB) sector. The CMMC 2.0 Framework, as defined in 32 CFR part 170, assesses compliance with applicable information security requirements. This rule provides DoD with assurances that a DIB contractor can adequately protect sensitive unclassified information at a level commensurate with the risk, accounting for information flow down to its subcontractors in a multi-tier supply chain. The annualized costs associated with this rule are estimated at approximately $16 million for the public.

Action	Date
Interim Final Rule	09/29/2020
Interim Final Rule Comment Period End	11/30/2020
Interim Final Rule Effective	11/30/2020
NPRM	08/15/2024
NPRM Comment Period End	10/15/2024
Final Action	10/00/2025

https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=0750-AK81

DoL, Education Dept. Partnership

US DEPARTMENTS OF LABOR, EDUCATION TAKE NEXT STEPS IN IMPLEMENTING THEIR WORKFORCE DEVELOPMENT PARTNERSHIP

Departments will integrate education and workforce systems through staff detail, integrated state plan portal, and centralizing program funds

WASHINGTON – Today, the U.S. departments of Labor and Education announced they have taken historic steps to integrate the federal government's workforce portfolio through its innovative partnership announced earlier this year. The departments are launching an integrated state plan portal that will streamline federal workforce development programs and allow Labor and Education to administer core Workforce Innovation and Opportunity Act programs, including adult education and family literacy programs. The Department of Education will transfer program funds and detail staff to the Department of Labor to support the programs.

These actions position the Labor Department as the centralized hub for federal workforce programs and effectuate the agencies' joint workforce development agreement.

Adult education and CTE grantees will now use the Labor Department's Payment Management System, thereby aligning the grants management and payment systems across Education and Labor's education and workforce programs.

As of September 8, 2025

https://www.dol.gov/newsroom/releases/osec/osec20250908

SBA Awards $1.1m For Small Mfg Growth

WASHINGTON – Today, the U.S. Small Business Administration (SBA) announced it has awarded $1.1 million in grants to three applicant organizations who will provide training and technical assistance to support small manufacturers in the SBA's Empower to Grow (E2G) Program. These qualified awardees will deliver regional support to small manufacturers in critical industries, in support of the agency's Made in America Manufacturing Initiative to restore American jobs, industry, and national security.

"The SBA is focused on delivering for America's manufacturers – the majority of whom are small businesses – by offering the capital and resources they need to rebuild America's industrial strength," **said SBA Administrator Kelly Loeffler.** "After walking dozens of factory floors, I've seen firsthand the talent and commitment that drives our entrepreneurs to deliver products and jobs – and they're ready to expand. With targeted grant dollars that support tools and training with broad geographic reach, we are adding to a range of efforts – from new loan programs to our Onshoring Portal – that will help job creators build a future which is Made in America, by Americans."

SBA's E2G Program offers eligible small manufacturers free topical courses, hands-on training, and one-on-one consulting to support their growth, operations, hiring, regulatory compliance, and government contracting competitiveness.

The E2G Program manufacturing grant recipients are:

As of September 23, 2025

The Ohio State University

Geographic Scope: Central Ohio (six manufacturing-dense counties: Cuyahoga, Hamilton, Franklin, Summit, Montgomery, and Lake)

https://www.sba.gov/article/2025/09/23/sba-awards-11-million-support-made-america-manufacturing

NLRB Sues New York State

September 16, 2025

On Friday, September 12, the National Labor Relations Board (NLRB) filed a lawsuit against the State of New York contesting the validity of S.8034A, signed into law by Governor Kathy Hochul on September 5, 2025. The lawsuit was authorized by Acting General Counsel William B. Cowen, who has delegated authority for such litigation in the absence of a Board quorum. S.8034A amends the State Labor Relations Act and grants the New York Public Employment Relations Board authority to oversee private sector union elections and to investigate and resolve unfair labor practices. The National Labor Relations Board holds exclusive jurisdiction over most private sector labor disputes under the National Labor Relations Act (NLRA), and legislation such as that signed by Governor Hochul is preempted by the NLRA, as explained in Acting General Counsel Cowen's August 15 press release.

Through the delegation of certain duties to the Acting General Counsel, the Agency has been able to continue its normal operations and fulfill its statutory duties of investigating unfair labor practices and processing representation petitions to the greatest extent permitted by law, largely unaffected by the temporary absence of a Board quorum or a designated Chairman. Thus, however well-meaning, misguided legislation such as S.8034A will ultimately undermine the national framework for protecting employees' rights that has been in place for ninety years.

As of September 16, 2025

https://www.nlrb.gov/news-outreach/news-story/nlrb-files-lawsuit-against-the-state-of-new-york-to-protect-agencys-0

EPA Proposes End to GHG Reporting Program

WASHINGTON – Today, in accordance with President Trump's Day One executive orders, U.S. Environmental Protection Agency (EPA) Administrator Lee Zeldin announced a proposed rule to end the burdensome Greenhouse Gas Reporting Program (GHGRP), saving American businesses up to $2.4 billion in regulatory costs while maintaining the agency's statutory obligations under the Clean Air Act (CAA). Unlike other mandatory information collections under the CAA, the GHGRP is not directly related to a potential regulation and has no material impact on improving human health and the environment. If finalized, the proposal would remove reporting obligations for most large facilities, all fuel and industrial gas suppliers, and CO2 injection sites.

The GHGRP requires 47 source categories, covering over 8,000 facilities and suppliers in the U.S. to calculate and submit their greenhouse gas (GHG) emissions reporting annually. Following a careful review, EPA proposed that there is no requirement under CAA section 114(a) to collect GHG emission information from businesses nor is continuing the ongoing costly data collection useful to fulfill any of the agency's statutory obligations. Therefore, EPA is proposing to remove all GHG reporting requirements, except for those subject to the Waste Emissions Charge (WEC).

CAA section 136 only requires data collection for segments of subpart W (petroleum and natural gas systems) subject to the WEC. On July 4, 2025, President Trump signed the One Big Beautiful Bill Act, which amended CAA section 136(g), so that the WEC now applies to emissions reported for calendar year 2034 and for each year thereafter. In accordance with the law, EPA will not be collecting subpart W data until 2034.

As of September 12, 2025

https://www.epa.gov/newsreleases/epa-releases-proposal-end-burdensome-costly-greenhouse-gas-reporting-program-saving-24

TSCA New Substance Risk Evaluation

The proposed rule includes the following proposed amendments that address targeted changes to EPA's process for conducting TSCA risk evaluations made in the 2024 Biden-era regulation titled *Procedures for Chemical Risk Evaluation under TSCA* (2024 Risk Evaluation Framework Rule):

- A requirement for EPA to make a determination of unreasonable risk for each of the conditions of use within the scope of the chemical's risk evaluation as dictated by Congress in TSCA, as amended by the Lautenberg Chemical Safety for the 21st Century Act, instead of a single risk determination on the chemical substance as a whole.
- Clarifications as to how EPA will consider occupational exposure controls such as personal protective equipment and industrial controls when conducting risk evaluations and making risk determinations.
- Clarifications regarding EPA's discretionary authority to determine which conditions of use, exposure routes, and exposure pathways it will consider in a risk evaluation.
- Revisions to certain regulatory definitions to ensure consistency with Executive Order 14303 Restoring Gold Standard Science and to ensure transparency and accountability in conducting risk evaluations.
- Revisions to the procedures and requirements EPA would follow when revising or supplementing risk evaluation documents to better enable EPA to meet the statutory deadlines to assess and manage risk.
- Adjustments to the process and information collection obligations for manufacturers (including importers) for requesting an agency-conducted TSCA risk evaluation.

As of September 22, 2025

https://www.epa.gov/newsreleases/epa-releases-proposal-increase-efficiency-better-protect-health-and-environment

Formal Guidance on R&D Deduction

(3) *Applicability*. This change applies to a taxpayer that wants to:

(a) for a taxable year beginning after December 31, 2024, and before January 1, 2026, change to the § 174A(a) deduction method for domestic research or experimental expenditures that are paid or incurred in taxable years beginning after December 31, 2024;

(b) for a taxable year beginning after December 31, 2024, and before January 1, 2026, change to the § 174A(c) amortization method for domestic research or experimental expenditures that are paid or incurred in taxable years beginning after December 31, 2024;

(c) in the case of a small business taxpayer, change to the small business retroactive method for a taxable year beginning before January 1, 2025, for which an original Federal income tax return is filed after August 28, 2025, for domestic research or experimental expenditures that were paid or incurred in taxable years beginning after December 31, 2021, and before January 1, 2025; or

(d) for the first taxable year beginning after December 31, 2024 (or, in the case of a taxpayer described in section 7.02(6)(b) of this revenue procedure, for a taxable year beginning after December 31, 2024, and before January 1, 2026), change to use the recovery of unamortized amount method for the remaining unamortized amount.

As of September 15, 2025

https://www.irs.gov/irb/2025-38_IRB

Formal Guidance on R&D Deduction

(c) A change in a taxpayer's treatment of expenditures to comply with § 174 or § 174A, or to make certain elections provided in OBBBA § 70302(f), is a change in method of accounting to which §§ 446(e) and 481, and the corresponding regulations, apply. A taxpayer that changes its method of accounting to comply with § 174 or § 174A or to make such elections under OBBBA § 70302(f) must use the accounting method change procedures in Rev. Proc. 2015-13 or its successor. Section 7.01 of Rev. Proc. 2025-23, as modified by this revenue procedure, allows taxpayers to obtain automatic consent to change their method of accounting for domestic research or experimental expenditures under TCJA § 174. Section 7.02 of Rev. Proc. 2025-23, as modified by this revenue procedure, allows taxpayers to obtain automatic consent to (1) change their method of accounting for domestic research or experimental expenditures to a method of accounting under § 174A for amounts paid or incurred in taxable years beginning after December 31, 2024, (2) in the case of eligible taxpayers, change their method of accounting for domestic research or experimental expenditures under OBBBA § 70302(f)(1)(C) (small business retroactive method) for amounts paid or incurred in taxable years beginning after December 31, 2021, and before January 1, 2025, and (3) change their method of accounting for domestic research or experimental expenditures under OBBBA § 70302(f)(2)(B) (recovery of unamortized amount method) for amounts paid or incurred in taxable years beginning after December 31, 2021, and before January 1, 2025. Section 7.03 of Rev. Proc. 2025-23, as modified by this revenue procedure, allows taxpayers to obtain automatic consent to change their method of accounting for foreign research or experimental expenditures under either TCJA § 174 or § 174.

As of September 15, 2025

https://www.irs.gov/irb/2025-38_IRB

Amended Return R&D Claim Timeline

(a) *In general*. For an applicable taxable year, an election under this section 3.03 made on an AAR or amended return for such applicable taxable year, or an AAR or amended return filed to carry out an election made for another applicable taxable year under this section 3.03, must be filed on or before July 6, 2026. As previously discussed in section 2.06(2)(b) of this revenue procedure, small business taxpayers with an applicable taxable year beginning in 2022 should be aware that for purposes of OBBBA § 70302(f), § 6511, which governs the statute of limitations for credit or refund, was not amended. Accordingly, any election under this section 3.03 made on an AAR or amended return for such applicable taxable year, or an AAR or amended return filed to carry out an election made for another applicable taxable year under this section 3.03, will be considered timely only if it is filed on or before the earlier of: (i) July 6, 2026, or (ii) the due date for filing a claim for credit or refund for such applicable taxable year under § 6511 or § 301.6511(a)-1(a)(1) (the date that is three years from the time the return was filed for the applicable taxable year beginning in 2022).

(b) *Example 1*. Taxpayer, a C corporation, timely filed a Federal income tax return for its applicable taxable year beginning January 1, 2022, and ending December 31, 2022, on March 1, 2023. Under section 3.03(3)(a) of this revenue procedure, and consistent with §§ 6511(a) and 6513(a), the taxpayer's due date for filing an amended return to make an election under this section 3.03, or to carry out an election made for another applicable taxable year under this section 3.03, for the applicable taxable year ending December 31, 2022, is April 15, 2026.

As of September 15, 2025

https://www.irs.gov/irb/2025-38_IRB

Initial Guidance on Overtime Deduction

No tax on overtime (Sec. 70202)

New deduction: Effective for 2025 through 2028, individuals who receive qualified overtime compensation may deduct the pay that exceeds their regular rate of pay (such as the "half" portion of "time-and-a-half" compensation) that is required by the Fair Labor Standards Act (FLSA) and reported on a Form W-2, Form 1099, or other specified statement furnished to the individual.

- Maximum annual deduction is $12,500 ($25,000 for joint filers).
- Deduction phases out for taxpayers with modified adjusted gross income over $150,000 ($300,000 for joint filers)

Taxpayer eligibility: Deduction is available for both itemizing and non-itemizing taxpayers.

Taxpayers must:

- Include their Social Security number on the return and
- File jointly if married, to claim the deduction.

Reporting: Employers and other payors are required to file information returns with the IRS (or SSA) and furnish statements to taxpayers showing the total amount of qualified overtime compensation paid during the year.

Guidance: The IRS will provide transition relief for tax year 2025 for taxpayers claiming the deduction and for employers and other payors subject to the new reporting requirements.

As of September 23, 2025

https://www.irs.gov/newsroom/one-big-beautiful-bill-provisions

Initial Guidance on “No Tax on Tips”

IR-2025-92, Sept. 19, 2025

WASHINGTON — The Department of the Treasury and the Internal Revenue Service today provided guidance on “no tax on tips” provision. The One, Big, Beautiful Bill proposed regulations identify occupations customarily and regularly receive tips and define “qualified tips” eligible taxpayers may claim as a deduction. The proposed regulations list nearly 70 separate occupations of tipped workers, from bartenders to water taxi operators.

Treasury and IRS request comments from the public within 30 days to be made through Regulations.gov. Complete instructions on submitting comments can be found in the proposed regulations. **Comments on the proposed regulations are due by Oct. 23, 2025.**

List of occupations that receive tips

Treasury Tipped Occupation Code, provides a three-digit code and descriptions for the occupations listed within the proposed regulations. The proposed regulations group the occupations into eight categories:

- 100s – Beverage and Food Service
- 200s – Entertainment and Events
- 300s – Hospitality and Guest Services
- 400s – Home Services
- 500s – Personal Services
- 600s – Personal Appearance and Wellness
- 700s – Recreation and Instruction
- 800s – Transportation and Delivery

https://www.irs.gov/newsroom/treasury-irs-issue-guidance-listing-occupations-where-workers-customarily-and-regularly-receive-tips-under-the-one-big-beautiful-bill

EPA Proposes End to GHG Reporting Program

The proposed rule includes the following proposed amendments that address targeted changes to EPA's process for conducting TSCA risk evaluations made in the 2024 Biden-era regulation titled *Procedures for Chemical Risk Evaluation under TSCA* (2024 Risk Evaluation Framework Rule):

- A requirement for EPA to make a determination of unreasonable risk for each of the conditions of use within the scope of the chemical's risk evaluation as dictated by Congress in TSCA, as amended by the Lautenberg Chemical Safety for the 21st Century Act, instead of a single risk determination on the chemical substance as a whole.
- Clarifications as to how EPA will consider occupational exposure controls such as personal protective equipment and industrial controls when conducting risk evaluations and making risk determinations.
- Clarifications regarding EPA's discretionary authority to determine which conditions of use, exposure routes, and exposure pathways it will consider in a risk evaluation.
- Revisions to certain regulatory definitions to ensure consistency with Executive Order 14303 Restoring Gold Standard Science and to ensure transparency and accountability in conducting risk evaluations.
- Revisions to the procedures and requirements EPA would follow when revising or supplementing risk evaluation documents to better enable EPA to meet the statutory deadlines to assess and manage risk.
- Adjustments to the process and information collection obligations for manufacturers (including importers) for requesting an agency-conducted TSCA risk evaluation.

As of September 22, 2025

https://www.epa.gov/newsreleases/epa-releases-proposal-increase-efficiency-better-protect-health-and-environment

CMMC Final Implementing Rule

Federal Register / Vol. 90, No. 173 / Wednesday, September 10, 2025

DEPARTMENT OF DEFENSE

Defense Acquisition Regulations System

48 CFR Parts 204, 212, 217, and 252

[Docket DARS–2020–0034]

RIN 0750–AK81

Defense Federal Acquisition Regulation Supplement: Assessing Contractor Implementation of Cybersecurity Requirements (DFARS Case 2019–D041)

AGENCY: Defense Acquisition Regulations System, Department of Defense (DoD).

ACTION: Final rule.

SUMMARY: DoD is issuing a final rule amending the Defense Federal Acquisition Regulation Supplement (DFARS) to incorporate contractual requirements related to the final Cybersecurity Maturity Model Certification program rule, titled Cybersecurity Maturity Model Certification Program. This final DFARS rule also partially implements a section of the National Defense Authorization Act for Fiscal Year 2020 that directed the Secretary of Defense to develop a consistent, comprehensive framework to enhance cybersecurity for the U.S. defense industrial base.

DATES: This rule is effective November 10, 2025.

https://www.federalregister.gov/documents/2025/09/10/2025-17359/defense-federal-acquisition-regulation-supplement-assessing-contractor-implementation-of

CMMC Final Implementing Rule

- Final Rule Issued: Published Sept. 10, 2025; effective Nov. 10, 2025
- Mandatory Certification: Contractors must maintain CMMC certification at required level for contract eligibility
- Annual Requirements: CMMC UID registration + yearly affirmation in SPRS
- Phased Rollout: Three-year implementation across contracts
- Flow-Down to Subcontractors: Applies to all handling FCI or CUI; non-compliance may bar subcontract awards
- Liability Risk: False Claims Act exposure for misrepresentation of compliance
- Transition Option: Conditional certification at Levels 2–3 allowed for up to 180 days with POA&M

As of September 10, 2025

https://www.federalregister.gov/documents/2025/09/10/2025-17359/defense-federal-acquisition-regulation-supplement-assessing-contractor-implementation-of

CMMC Final Implementing Rule

3. PROCEDURES

The language at DFARS 204.7503 was updated to add paragraph headings to clarify the topic addressed in each paragraph. Language was updated to clarify that contracting officers are required to check SPRS and not award a contract, task order, or delivery order to an offeror that does not have a current CMMC status posted in SPRS at the CMMC level required by the solicitation, or higher, for each CMMC UID provided by the offeror applicable to each of the contractor information systems that will process, store, or transmit FCI or CUI and be used in performance of the contract posted in SPRS. The language at paragraph (d) has been updated to clarify that all offerors are required to provide the CMMC UIDs applicable to each of the contractor information systems that process, store, or transmit FCI or CUI and that will be used in performance of the contract.

As of September 10, 2025

https://www.federalregister.gov/documents/2025/09/10/2025-17359/defense-federal-acquisition-regulation-supplement-assessing-contractor-implementation-of

EU’s CBAM Simplification Package

European Parliament
2024-2029

Carbon Border Adjustment Mechanism: simplification and strengthening

European Parliament legislative resolution of 10 September 2025 on the proposal for a regulation of the European Parliament and of the Council amending Regulation (EU) 2023/956 as regards simplifying and strengthening the carbon border adjustment mechanism (COM(2025)0087 – C10-0035/2025 – 2025/0039(COD))

As of September 10, 2025

https://www.europarl.europa.eu/news/en/press-room/20250905IPR30181/cbam-parliament-adopts-simplifications-to-the-eu-carbon-leakage-instrument

EU’s CBAM Simplification Package

- De Minimis Exemption: Imports up to 50 tonnes/year of steel, aluminum, cement, fertilizers exempt from obligations (replaces €150/shipment rule)
- Coverage Impact: Exempts ~90% of importers (mostly SMEs/occasional importers) while still capturing ~99% of emissions
- Emissions Boundaries: Only precursor emissions (e.g., smelting) count for certain steel & aluminum goods; downstream processing emissions excluded
- Reporting: Switch from quarterly to annual declarations for importers above the threshold
- Certificate Timeline: Sales for 2026 imports deferred until Feb 2027; surrender deadline extended to Aug 2027

Next Step: Requires Council of the EU endorsement before entering into force

https://www.europarl.europa.eu/news/en/press-room/20250905IPR30181/cbam-parliament-adopts-simplifications-to-the-eu-carbon-leakage-instrument

As of September 10, 2025

Statements, Actions on Tariffs and Trade – Sectoral (Product) Tariffs

Industrial Machinery Tariff Investigation

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

DEPARTMENT OF COMMERCE

Bureau of Industry and Security

[Docket No. 250924-0161]

XRIN 0694-XC138

Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Robotics and Industrial Machinery

AGENCY: Bureau of Industry and Security, Office of Strategic Industries and Economic Security, U.S. Department of Commerce.

ACTION: Notice of request for public comments.

https://www.govinfo.gov/content/pkg/FR-2025-09-26/pdf/2025-18729.pdf

Industrial Machinery 232 Investigation

On September 2, 2025, the Secretary of Commerce initiated an investigation under Section 232 (19 U.S.C. 1862) to determine the effects on national security of imports of robotics and industrial machinery, and their parts and components.

For the purpose of this investigation "robotics and industrial machinery" includes, among other things, robots and programmable, computer-controlled mechanical systems. This equipment spans CNC machining centers, turning and milling machines, grinding and deburring equipment, and industrial stamping and pressing machines. It also includes automatic tool changers, jigs and fixtures, and machine tools for cutting, welding, and handling work pieces. Application-specific specialty metalworking equipment used to treat, form, or cut metal, such as autoclaves and industrial ovens, metal finishing and treatment equipment, EDM machinery, and laser and water-cutting tools and machinery is also included.

As of September 26, 2025

https://www.govinfo.gov/content/pkg/FR-2025-09-26/pdf/2025-18729.pdf

Industrial Machinery, Robotics 232 Tariffs

Who: All countries pending investigation initiated Sept. 2nd

What: Investigation into the national security threat of imports of robotics & industrial machinery including CNC machining centers, milling & turning machines; grinding, deburring, stamping, pressing equipment; automatic tool changers, fixtures, industrial ovens, autoclaves; laser and water-jet cutting systems; & other metalworking & finishing machinery

May result in tariffs similar to steel, aluminum, others

When: Sept. 2 initiated; Oct. 17 Comments due

Unlikely to use entire 270 days of investigation

Medical Device, PPE 232 Tariff Investigation

Who: All countries pending investigation

What: Investigation into the national security threat of imports of personal protective equipment (PPE), medical consumables, & medical equipment/devices, which includes durable equipment, tools, and machines used in healthcare as well as any instrument, apparatus, or machine used in the diagnosis, monitoring, or treatment of medical conditions

When: Sept. 2 initiated; Oct. 17 Comments due
Unlikely to use entire 270 days of investigation

Truck, Cabinet Tariffs Announced

Donald J. Trump
@realDonaldTrump

In order to protect our Great Heavy Truck Manufacturers from unfair outside competition, I will be imposing, as of October 1st, 2025, a 25% Tariff on all "Heavy (Big!) Trucks" made in other parts of the World. Therefore, our Great Large Truck Company Manufacturers, such as Peterbilt, Kenworth, Freightliner, Mack Trucks, and others, will be protected from the onslaught of outside interruptions. We need our Truckers to be financially healthy and strong, for many reasons, but above all else, for National Security purposes!

5.57k ReTruths **24.5k** Likes Sep 25, 2025, 6:51 PM

Donald J. Trump
@realDonaldTrump

We will be imposing a 50% Tariff on all Kitchen Cabinets, Bathroom Vanities, and associated products, starting October 1st, 2025. Additionally, we will be charging a 30% Tariff on Upholstered Furniture. The reason for this is the large scale "FLOODING" of these products into the United States by other outside Countries. It is a very unfair practice, but we must protect, for National Security and other reasons, our Manufacturing process. Thank you for your attention to this matter!

5.53k ReTruths **25.3k** Likes Sep 25, 2025, 7:10 PM

2nd Inclusion Process: 232 Steel/Aluminum

Federal Register / Vol. 90, No. 178 / Wednesday, September 17, 2025

DEPARTMENT OF COMMERCE

Bureau of Industry and Security

[Docket No. 250915–0134]

XRIN 0694–XC139

Notice of the Opening of the Inclusions Window for the Section 232 Steel and Aluminum Tariff Inclusions Process

AGENCY: Bureau of Industry and Security, Office of Strategic Industries and Economic Security, U.S. Department of Commerce.

ACTION: Notice of the opening of the inclusions window for the steel and aluminum tariff inclusions process.

SUMMARY: The Bureau of Industry and Security (BIS) has established a process for including additional derivative steel and aluminum articles within the scope of the duties authorized by the President under section 232 of the Trade Expansion Act of 1962. This notice opens the September 2025 inclusions window for submissions.

DATES: The inclusions window is opened on September 15, 2025, and closes at 11:59 p.m. ET on September 29, 2025.

As of September 17, 2025

https://www.federalregister.gov/documents/2025/09/17/2025-18008/notice-of-the-opening-of-the-inclusions-window-for-the-section-232-steel-and-aluminum-tariff

2nd Inclusion Process: 232 Steel/Aluminum

- When: Current window closes Sept 29, 2025; next opens January 2026
- Where: Submit requests in PDF via email to *DIBPrograms@bis.doc.gov*
- What to Include:
  - Applicant identification (company, association, etc.)
  - Article description + 8- or 10-digit HTSUS code
  - Justification as a steel/aluminum derivative (with value breakdown)
  - Domestic industry impact details
  - Import vs. domestic production statistics
  - National security/economic security justification
  - Public + confidential versions (≤30 pages total)

As of September 17, 2025

https://www.federalregister.gov/documents/2025/09/17/2025-18008/notice-of-the-opening-of-the-inclusions-window-for-the-section-232-steel-and-aluminum-tariff

232 Auto Parts Inclusion Process

Federal Register / Vol. 90, No. 178 / Wednesday, September 17, 2025

DEPARTMENT OF COMMERCE

Bureau of Industry and Security

15 CFR Part 705

[Docket No. 250728–0130]

RIN 0625–AB30

Adoption and Procedures of the Section 232 Automobile Parts Tariff Inclusions Process

AGENCY: Bureau of Industry and Security, U.S. Department of Commerce.

ACTION: Interim final rule.

SUMMARY: On March 26, 2025, the President issued Proclamation 10908, "Adjusting Imports of Automobiles and Automobile Parts into The United States" (Automobile Proclamation). The Automobile Proclamation required the Secretary of Commerce to establish a process for including additional automobile parts articles for passenger vehicles and light trucks within the scope of the tariffs imposed by the President in the Automobile Proclamation. This interim final rule (IFR) establishes the requisite process.

https://www.federalregister.gov/documents/2025/09/17/2025-18015/adoption-and-procedures-of-the-section-232-automobile-parts-tariff-inclusions-process

232 Auto Parts Inclusions

- First window application window Oct 1–15, 2025; next January 2026
- Where: Submit requests in PDF via email to *AutoInclusions@trade.gov*
- What to Include:
  - Requestor identification (producer/association)
  - Article description + 8- or 10-digit HTSUS code
  - Explanation of why article qualifies as auto part
  - Domestic industry impact details
  - Import vs. domestic production statistics
  - National security/economic security justification
  - Public + confidential versions (≤30 pages total)

As of September 16, 2025

https://www.federalregister.gov/documents/2025/09/17/2025-18015/adoption-and-procedures-of-the-section-232-automobile-parts-tariff-inclusions-process

Updated IEEPA Exemptions

CSMS # 66151866 - UPDATE – Products Exempted from Reciprocal Tariffs

GUIDANCE

Annex II to Executive Order 14257, as amended by the September 5, 2025 Executive Order, lists the products that are exempted from the reciprocal tariffs. The amendments pursuant to the September 5, 2025 Executive Order include both products that are added to, and removed from, Annex II.

PRODUCTS THAT HAVE BEEN ADDED TO OR REMOVED FROM ANNEX II

The modification pursuant to September 5, 2025 Executive Order shall be effective with respect to such goods entered for consumption, or withdrawn from warehouse for consumption, on or after 12:01 a.m. eastern time on September 8, 2025. Only products that are properly classified in the headings and subheadings of the Harmonized Tariff Schedule of the United States (HTSUS) that are listed in Annex II are exempted from the tariff action imposed by Executive Order 14257, as amended.

https://content.govdelivery.com/bulletins/gd/USDHSCBP-3f165ba?wgt_ref=USDHSCBP_WIDGET_2

https://www.whitehouse.gov/wp-content/uploads/2025/09/ANNEX-II.pdf

Updated IEEPA Exemptions - Additions

7501.10.00	Nickel mattes	Addition
7502.10.00	Nickel, not alloyed	Addition
7502.20.00	Nickel alloys	Addition
7503.00.00	Nickel waste and scrap	Addition
7504.00.00	Nickel powders and flakes	Addition

7903.90.30	Zinc powder	Addition

8302.10.60	Iron or steel, aluminum, or zinc hinges and base metal parts thereof, not designed for motor vehicles	Aircraft
8302.10.90	Base metal (other than iron or steel or aluminum or zinc) hinges and base metal parts thereof	Aircraft
8302.20.00	Base metal castors and base metal parts thereof	Aircraft
8302.42.30	Iron or steel, aluminum, or zinc mountings, fittings and similar articles, suitable for furniture, and base metal parts thereof	Aircraft
8302.42.60	Base metal (other than iron or steel or aluminum or zinc) mountings, fittings and similar articles, suitable for furniture, and base metal parts thereof	Aircraft

https://www.whitehouse.gov/wp-content/uploads/2025/09/ANNEX-II.pdf

Statements, Actions on Tariffs and Trade – Country, Bloc-Specific Tariffs

IEEPA Tariff SCOTUS Hearing Nov. 5th

ORDER IN PENDING CASES

LEARNING RESOURCES, INC., ET AL. V. TRUMP, PRESIDENT OF U.S., ET AL.

TRUMP, PRESIDENT OF U.S., ET AL. V. V.O.S. SELECTIONS, INC., ET AL.

The petition for a writ of certiorari before judgment in No. 24-1287 is granted. The motion to expedite and the petition for a writ of certiorari in No. 25-250 are granted. The cases are consolidated, and a total of one hour is allotted for oral argument. Respondents in No. 24-1287 and petitioners in No. 25-250 shall file an opening brief on the merits on or before Friday, September 19, 2025. Any *amicus curiae* briefs in support or in support of neither party shall be filed on or before Tuesday, September 23, 2025. Petitioners in No. 24-1287 and respondents in No. 25-250 shall file response briefs on the merits on or before Monday, October 20, 2025. Any *amicus curiae* briefs in support shall be filed on or before Friday, October 24, 2025. A reply brief shall be filed by Thursday, October 30, 2025. The cases will be set for argument in the first week of the November 2025 argument session.

https://www.supremecourt.gov/orders/courtorders/090925zr1_hejm.pdf

IEEPA Tariffs Go To SCOTUS

SUPREME COURT OF THE UNITED STATES
OCTOBER TERM 2025

For the Session Beginning November 3, 2025

Wednesday, November 5

(5)

24-1287) LEARNING RESOURCES, INC. V. TRUMP, PRESIDENT OF UNITED STATES

25-250) TRUMP, PRESIDENT OF UNITED STATES V. V.O.S. SELECTIONS, INC.

(Consolidated - 1 hr. for argument)

https://www.supremecourt.gov/oral_arguments/argument_calendars/MonthlyArgumentCalNovember2025.pdf

USMCA Review Begins

Federal Register / Vol. 90, No. 178 / Wednesday, September 17, 2025

OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

[Docket Nos. USTR–2025–0004 and USTR–2025–0005]

Request for Public Comments and Notice of Public Hearing Relating to the Operation of the Agreement Between the United States of America, the United Mexican States, and Canada

AGENCY: Office of the United States Trade Representative (USTR).

ACTION: Request for comments and notice of public hearing.

SUMMARY: USTR is commencing a public consultation process in advance of the joint review (Joint Review) of the Agreement between the United States of America, the United Mexican States, and Canada (USMCA or Agreement) on July 1, 2026. As directed by Congress, USTR is seeking public comments on the operation of the Agreement, including on the operation of the North American Competitiveness Committee (Competitiveness Committee) established therein.

DATES:

November 3, 2025 at 11:59 p.m. EST: Deadline for submitting written comments and requests to appear at the hearing. The request to appear must include a summary of testimony.

November 17, 2025: USTR will hold a public hearing in the main hearing room of the U.S. International Trade Commission, 500 E Street SW, Washington, DC 20436, beginning at 10 a.m. If necessary, the hearing may continue the next business day.

Seven calendar days after the last day of the public hearing, at 11:59 p.m. EST: Deadline for submission of post-hearing rebuttal comments.

https://www.federalregister.gov/documents/2025/09/17/2025-18010/request-for-public-comments-and-notice-of-public-hearing-relating-to-the-operation-of-the-agreement

USMCA Review Begins

Federal Register / Vol. 90, No. 178 / Wednesday, September 17, 2025

Request for Public Comments

In particular, this notice invites comments regarding:

- Any aspect of the operation or implementation of the USMCA.
- Any issues of compliance with the Agreement.
- Recommendations for specific actions that USTR should propose ahead of the Joint Review to promote balanced trade, new market access, and alignment on economic security with Mexico and Canada.
- Factors affecting the investment climate in North America and in the territories of each Party, as well as the effectiveness of the USMCA in promoting investment that strengthens U.S. competitiveness, productivity, and technological leadership.
- Strategies for strengthening North American economic security and competitiveness, including collaborative work under the Competitiveness Committee, and cooperation on issues related to non-market policies and practices of other countries.

https://www.federalregister.gov/documents/2025/09/17/2025-18010/request-for-public-comments-and-notice-of-public-hearing-relating-to-the-operation-of-the-agreement

U.S. – Japan Agreement

IMPLEMENTING THE UNITED STATES–JAPAN AGREEMENT

Executive Orders | September 4, 2025

Under the Agreement, the United States will apply a baseline 15 percent tariff on nearly all Japanese imports entering the United States, alongside separate sector-specific treatment for automobiles and automobile parts; aerospace products; generic pharmaceuticals; and natural resources that are not naturally available or produced in the United States. This new tariff framework, combined with expanded United States exports and investment-driven production, will help reduce the trade deficit with Japan and restore greater balance to the overall United States trade position.

Japan, meanwhile, will provide American manufacturing, aerospace, agriculture, food, energy, automobile, and industrial goods producers with breakthrough openings in market access across key sectors. Specifically, the Government of Japan is working toward an expedited implementation of a 75 percent increase of United States rice procurements within the Minimum Access rice scheme and purchases of United States agricultural goods, including corn, soybeans, fertilizer, bioethanol (including for sustainable aviation fuel), as well as other United States products, in amounts totaling $8 billion per year. The Government of Japan is also working to accept for sale in Japan United States-manufactured and United States-safety-certified passenger vehicles without additional testing. Separately, Japan will purchase United States-made commercial aircraft, as well as United States defense equipment.

https://www.whitehouse.gov/presidential-actions/2025/09/implementing-the-united-states-japan-agreement/

U.S. – Japan Agreement

CSMS # 66242844 - Updated Guidance - Implementation of the United States-Japan Agreement and Modification of Duties on Imports from Japan

General Reciprocal Tariff

The reciprocal tariff for products of Japan is dependent on the Column 1 ad valorem or ad valorem equivalent duty rate applicable to the products.

- For a product of Japan with a Column 1 duty rate greater than or equal to 15 percent, the additional reciprocal tariff is zero (0). Use HTSUS heading 9903.02.72.
- For a product of Japan with a Column 1 duty rate less than 15 percent, the sum of the Column 1 and the reciprocal tariff rate is 15 percent. Use HTSUS heading 9903.02.73.

https://content.govdelivery.com/bulletins/gd/USDHSCBP-3f2c91c?wgt_ref=USDHSCBP_WIDGET_2

U.S. – EU Agreement: 15% Autos, Parts

CSMS # 66336270 - Guidance – Implementation of Tariff-Related Elements of the United States-European Union Framework Agreement

Changes to Section 232 Duties on Automobiles and Automobile Parts

Automobiles

- For an automobile that is the product of an EU member country with a Column 1 duty rate greater than or equal to 15 percent ad valorem, the additional Section 232 duty rate is zero (0). Use heading **9903.94.50**.
- For an automobile that is the product of an EU member country with a Column 1 duty rate less than 15 percent ad valorem, the combined Column 1 and additional Section 232 duty rate is 15 percent ad valorem. Use heading **9903.94.51**.

Automobile Parts

- For an automobile part that is the product of an EU member country with a Column 1 duty rate greater than or equal to 15 percent ad valorem, the additional Section 232 duty rate is zero (0). Use heading **9903.94.52**.
- For an automobile part that is the product of an EU member country with a Column 1 duty rate less than 15 percent ad valorem, the combined Column 1 and additional Section 232 duty rate is 15 percent ad valorem. Use heading **9903.94.53**.

https://content.govdelivery.com/bulletins/gd/USDHSCBP-3f4360e?wgt_ref=USDHSCBP_WIDGET_2

U.S. – EU Agreement

Continued Exemption from Reciprocal Tariffs for Products Subject to Section 232

As provided in heading 9903.01.33 and subdivision (v)(vi) through (v)(xii) of note 2 to subchapter III of the HTSUS, products of EU member countries that are subject to the Section 232 tariffs imposed by the following Presidential Proclamations continue to be exempt from Reciprocal tariffs:

- Proclamation 9704 of March 18, 2018, (Adjusting Imports of Aluminum Into the United States), as amended;
- Proclamation 9705 of March 8, 2018, (Adjusting Imports of Steel Into the United States), as amended;
- Proclamation 10962 of July 30, 2025, (Adjusting Imports of Copper Into the United States), as amended;
- Proclamation 10908 of March 26, 2025 (Adjusting Imports of Automobiles and Automobile Parts Into the United States).

https://content.govdelivery.com/bulletins/gd/USDHSCBP-3f4360e?wgt_ref=USDHSCBP_WIDGET_2

U.S. – EU Agreement

Changes Pursuant to the "Potential Tariff Adjustments for Aligned Partners" (PTAAP) Annex of EO 14346

Civil Aircraft

Products of EU member countries that fall under the World Trade Organization Agreement on Trade in Civil Aircraft, are no longer subject to additional tariffs imposed through:

- Executive Order 14257 of April 2, 2025 (Regulating Imports with a Reciprocal Tariff to Rectify Trade Practices that Contribute to Large and Persistent Annual United States Goods Trade Deficits), as amended;
- Proclamation 9704 of March 18, 2018 (Adjusting Imports of Aluminum Into the United States), as amended;
- Proclamation 9705 of March 8, 2018 (Adjusting Imports of Steel Into the United States), as amended;
- Proclamation 10962 of July 30, 2025 (Adjusting Imports of Copper Into the United States), as amended.

For such civil aircraft products that are no longer subject to these additional tariffs, use heading **9903.02.76**.

https://content.govdelivery.com/bulletins/gd/USDHSCBP-3f4360e?wgt_ref=USDHSCBP_WIDGET_2

U.S. – EU Agreement

Reciprocal Tariff Exemption on Certain Products

Certain products including unavailable natural resources and generic pharmaceuticals and their ingredients and chemical precursors that are products of EU member countries are no longer subject to Reciprocal tariffs effective for such products entered for consumption, or withdrawn from warehouse for consumption, on or after 12:01 a.m. eastern daylight time September 1, 2025.

https://content.govdelivery.com/bulletins/gd/USDHSCBP-3f4360e?wgt_ref=USDHSCBP_WIDGET_2

U.S. – EU Agreement

General Reciprocal Tariff

As a reminder, pursuant to Executive Order 14236 of July 31, 2025, Further Modifying The Reciprocal Tariff Rates, the Reciprocal tariff currently in place for products of EU member countries, other than those products specified above, entered for consumption or withdrawn from warehouse for consumption on or after 12:01 a.m. eastern daylight time August 7, 2025 is dependent on the Column 1 ad valorem or ad valorem equivalent duty rate applicable to the products.

- For a product of an EU member country with a Column 1 duty rate greater than or equal to 15 percent ad valorem, the additional Reciprocal tariff is zero (0). Use heading **9903.02.19**.
- For a product of an EU member country with a Column 1 duty rate less than 15 percent ad valorem, the combined Column 1 and Reciprocal tariff rate is 15 percent ad valorem. Use heading **9903.02.20**.

https://content.govdelivery.com/bulletins/gd/USDHSCBP-3f4360e?wgt_ref=USDHSCBP_WIDGET_2

Certain 301 Exclusions Extended Again

Federal Register / Vol. 90, No. 177 / Tuesday, September 16, 2025

OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE

Request for Comments on Whether Particular Exclusions in the Section 301 Investigation of China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation Warrant Further Extension

AGENCY: Office of the United States Trade Representative (USTR).

ACTION: Notice and request for comments.

SUMMARY: In prior notices, the U.S. Trade Representative modified the actions in the Section 301 investigation of China's acts, policies, and practices related to technology transfer, intellectual property, and innovation by excluding from additional duties certain products of China. There are currently 178 effective exclusions. USTR has extended these exclusions several times, including by providing a recent 90-day extension to further extend the exclusions through November 29, 2025. USTR invites public comment on whether any of the 178 effective exclusions warrant further extension beyond November 29, 2025.

DATES:

September 16, 2025, at 12:01 a.m. EDT: The public docket on the web portal at *https://comments.USTR.gov* will open for parties to submit comments on whether particular exclusions warrant further extension.

October 16, 2025, at 11:59 p.m. EDT: To be assured of consideration, submit written comments on the public docket by this date.

https://www.federalregister.gov/documents/2025/09/16/2025-17894/request-for-comments-on-whether-particular-exclusions-in-the-section-301-investigation-of-chinas

Example of 301 Exclusions Extended

Note	Exclusion Product Description
20(vvv)(i)(23)	Angle cock handle assemblies, of iron and steel, each measuring 11.43 cm by 21.59 cm by 5.08 cm and weighing 0.748 kg (described in statistical reporting number 8481.90.9040)
20(vvv)(i)(24)	Pipe brackets of aluminum, each with 4 ports, the foregoing measuring 27.9 cm x 20.3 cm x 17.8 cm and weighing 11.34 kg, designed for installation into air brake control valves (described in statistical reporting number 8481.90.9040)
20(vvv)(i)(25)	Electric motors, AC, permanent split capacitor type, not exceeding 16 W (described in statistical reporting number 8501.10.4020)
20(vvv)(i)(26)	DC electric motors, of an output of less than 18.65 W, other than brushless, measuring less than 38 mm in diameter (described in statistical reporting number 8501.10.4060)
20(vvv)(i)(27)	DC motors, of an output exceeding 37.5 W but not exceeding 74.6 W, valued over $2 but not over $30 each (described in statistical reporting number 8501.31.2000)
20(vvv)(i)(28)	AC motors, multi-phase, of rolled steel frame construction (described in statistical reporting number 8501.51.4040)
20(vvv)(i)(29)	AC motors, multi-phase, of an output of 186.5 kW or more but not exceeding 373 kW, having a cast iron frame construction (described in statistical reporting number 8501.53.8040)

https://ustr.gov/sites/default/files/files/Issue_Areas/Enforcement/Section%20301/Index%20of%20Exclusions%20for%20Possible%20Extension%20Beyond%20November%2029%20FINAL.pdf

Court Rejects 301 Tariff Appeal

United States Court of Appeals for the Federal Circuit

HMTX INDUSTRIES LLC, HALSTEAD NEW ENGLAND CORP., METROFLOR CORP., JASCO PRODUCTS COMPANY LLC,
Plaintiffs-Appellants

v.

UNITED STATES, OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE, JAMIESON GREER, U.S. TRADE REPRESENTATIVE, UNITED STATES CUSTOMS AND BORDER PROTECTION, RODNEY S. SCOTT, COMMISSIONER OF U.S. CUSTOMS AND BORDER PROTECTION,
Defendants-Appellees

Because Section 307(a)(1)(C) authorizes USTR to take escalatory, modified trade actions, and because USTR's remand redetermination meets the APA's procedural requirements in 5 U.S.C. § 553, we affirm the trial court and sustain the challenged Lists 3 and 4A tariffs.

Thousands of plaintiffs claimed that modification of Section 301 tariffs on China by expanding tariffs to List 3 and 4a constituted a major doctrines action

Court said modification was in line with USTRs authority

Tariffs remain

https://www.cafc.uscourts.gov/opinions-orders/23-1891.OPINION.9-25-2025_2578632.pdf

De Minimis Exemption Ends

- No de minimis treatment under EO 14324 (except national security cases)
- Carriers/qualified parties must collect & remit duties

Two Methodologies for Duty Assessment

- Methodology 1 (Ad Valorem): Apply IEEPA tariff % to declared value
- Methodology 2 (Specific Duty, 6 months only): Flat duty per item based on tariff rate
  - <16% → $80 | 16–25% → $160 | >25% → $200
- Use highest IEEPA rate if multiple origins
- After Feb 28, 2026 → Only Ad Valorem allowed

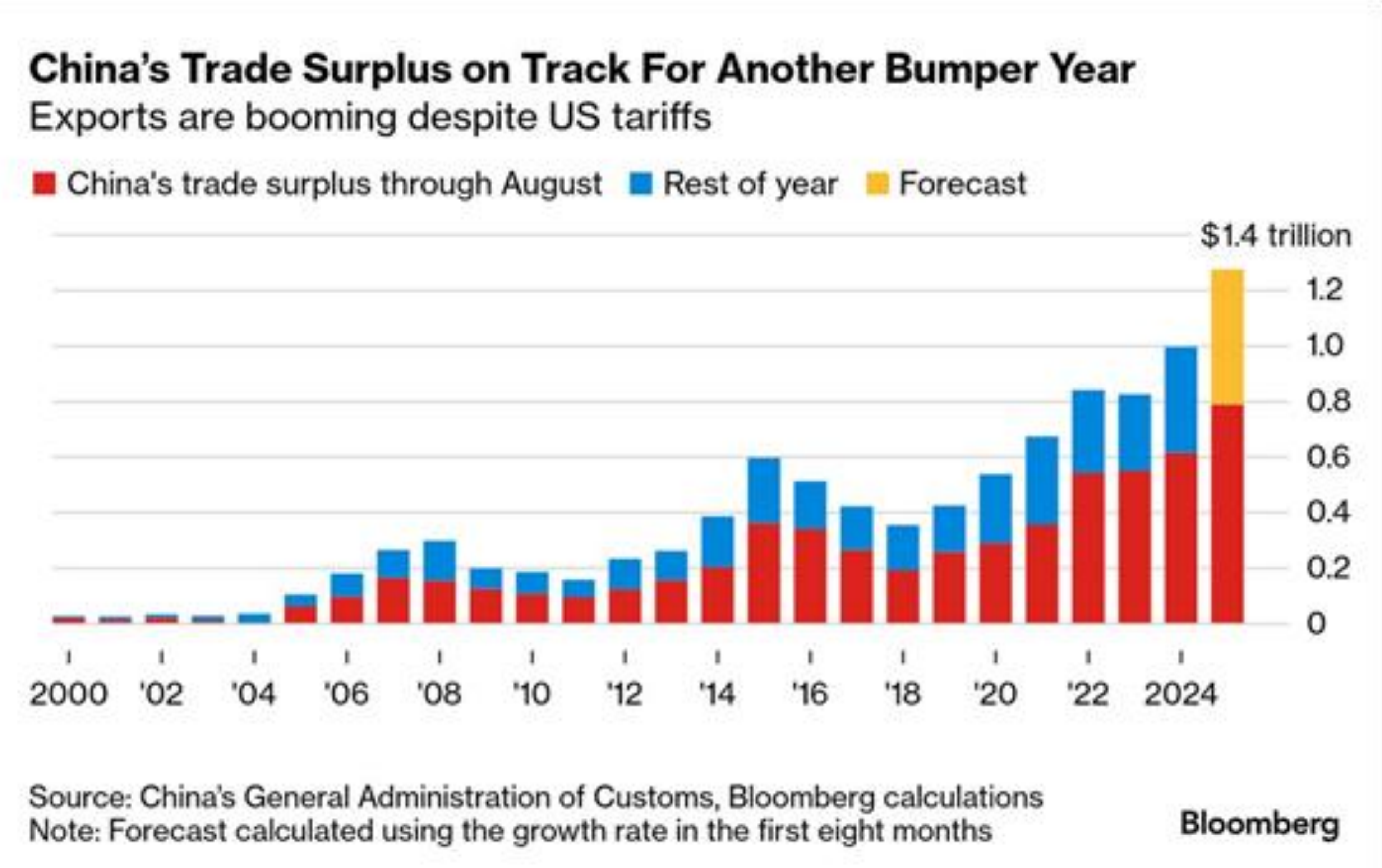
https://content.govdelivery.com/bulletins/gd/USDHSCBP-3f3d736?wgt_ref=USDHSCBP_WIDGET_2

Supply Chains and Data Points

Tariff Payments Surging

To help protect your privacy, PowerPoint has blocked automatic download of this picture.

China Exports



Global Economy Growth Projections

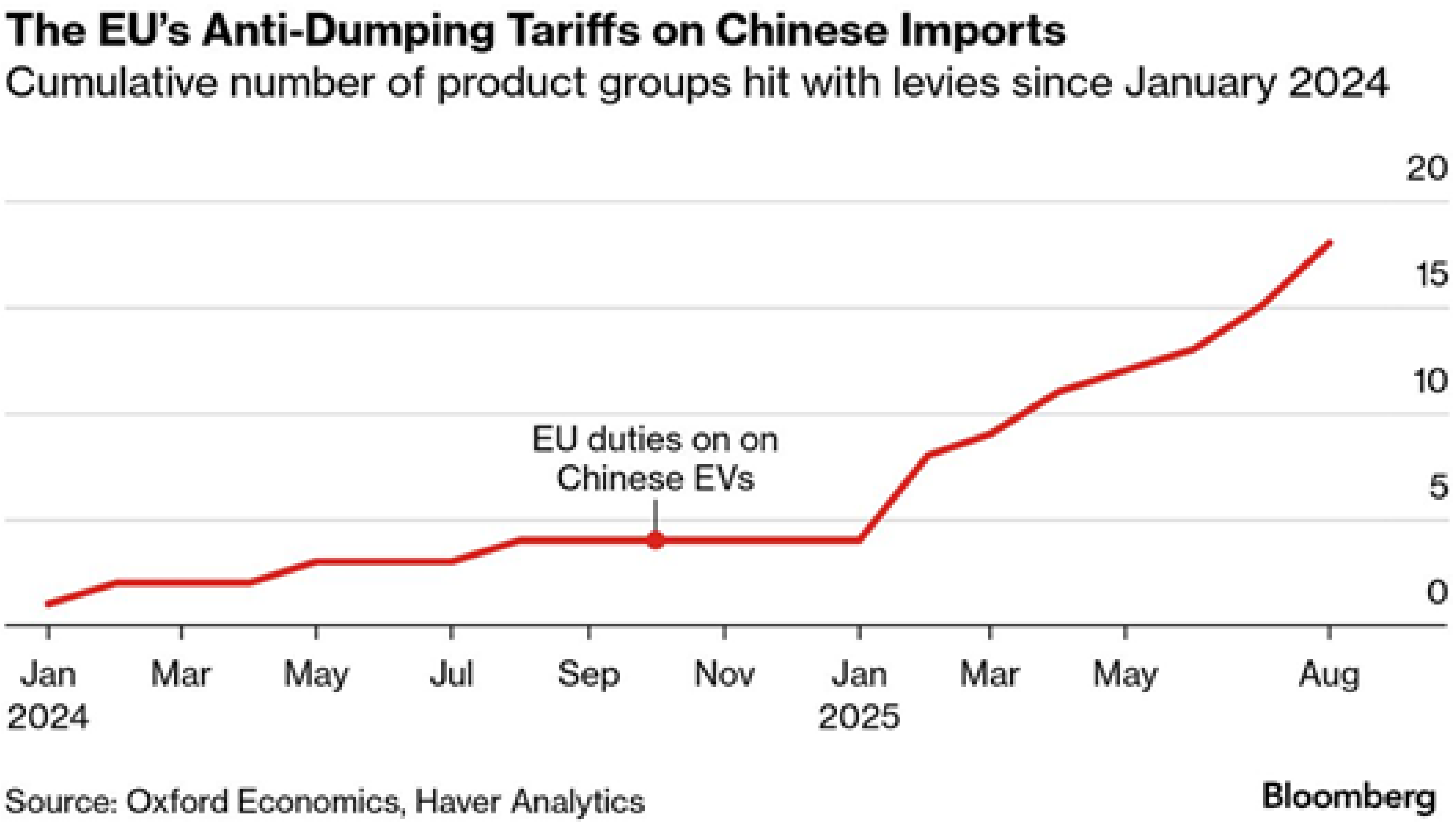
OECD Growth Projections

	Forecast for 2025 GDP	Change vs June forecast	Forecast for 2026 GDP	Change vs June forecast
World	3.2%	+0.3%	2.9%	0.0%
US	1.8	+0.2	1.5	0.0
Euro area	1.2	+0.2	1.0	-0.2
Germany	0.3	-0.1	1.1	-0.1
France	0.6	0.0	0.9	0.0
Italy	0.6	0.0	0.6	-0.1
UK	1.4	+0.1	1.0	0.0
Japan	1.1	+0.4	0.5	+0.1
China	4.9	+0.2	4.4	+0.1
India	6.7	+0.4	6.2	-0.2
Brazil	2.3	+0.2	1.7	+0.1

Source: Organization for Economic Cooperation and Development

Bloomberg

EU’s China Tariffs



US Mfg Activity Continues to Contract

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INSIDE BELTWAY

PMPA

PRECISION MACHINED PRODUCTS ASSOCIATION

INSIDE BELTWAY