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S&C Tariffs Tracker (Updated)

President Trump Announces “Secondary Tariffs” on Importers of Venezuelan Oil

SUMMARY

This week, President Donald J. Trump issued and published in the Federal Register an executive order (the “Order”) granting the Secretary of State authority to impose 25% tariffs beginning on April 2, 2025 “on all goods imported into the United States from any country that imports Venezuelan oil, whether directly from Venezuela or indirectly through third parties.”¹ The Order grants the Secretary of State broad discretion as to “whether the tariff of 25 percent will be imposed,”² and provides that any tariffs imposed will sunset one year after the last date on which a country imports Venezuelan oil. The Order also permits the Secretary of State to terminate them earlier at his discretion. It is presently unclear which countries the administration intends to target with this Order; however, commentators have noted that 68% of Venezuelan oil exports went to the People’s Republic of China in 2023.³

In announcing these tariffs, President Trump again relied on his authority under the International Emergency Economic Powers Act of 1977 (IEEPA)—a statute that historically has been used by U.S. presidents to impose economic sanctions, as opposed to tariffs. To invoke IEEPA, the President declared that the actions of “the regime of Nicolás Maduro in Venezuela” and “the Tren de Aragua gang” pose extraordinary threats to U.S. national security, necessitating “further economic measures to protect United States interests.”⁴ President Trump publicly referred to these new measures as “secondary tariffs,” a term that appears intended to parallel what are known as “secondary sanctions,” or sanctions penalties that the Office of Foreign Assets Control (OFAC) sometimes imposes on parties who do business with a sanctioned entity.⁵

The below Tariffs Tracker summarizes the status of various tariffs and trade measures that the Trump administration has announced, is implementing, or is actively considering for implementation. S&C will

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periodically update this tracker based on further developments, and our team is available should you have questions regarding the tariffs' applicability.

TRACKER

Tariff Description	U.S. Imports/Goods Affected	Countr(ies) of Origin	Rate ⁶	Effective Date(s)	Expiration Date	Statutory Authorit(ies)
Already in Effect						
China Tariffs	All goods (except in <i>de minimis</i> quantities and other limited exceptions) ⁷	China	10%	2/4/25	N/A (<i>de minimis</i> exception to be suspended upon notification by Commerce) ⁸	International Emergency Economic Powers Act (IEEPA)
Additional 10% China Tariffs	All goods (except in <i>de minimis</i> quantities and other limited exceptions)	China	10% (total 20%)	3/4/25	N/A (<i>de minimis</i> exception to be suspended upon notification by Commerce)	IEEPA
Mexico Tariffs	Goods that do not satisfy U.S.-Mexico-Canada Agreement (USMCA) rules of origin ⁹ (except in <i>de minimis</i> quantities and other limited exceptions)	Mexico	25% (10% for potash)	3/4/25	N/A (<i>de minimis</i> exception to be suspended upon notification by Commerce)	IEEPA
Canada Tariffs	Goods that do not satisfy USMCA rules of origin (except in <i>de minimis</i> quantities and other limited exceptions)	Canada	25% (10% for energy products and potash)	3/4/25	N/A (<i>de minimis</i> exception to be suspended upon notification by Commerce)	IEEPA
Steel Tariffs	Steel and steel derivatives	All (by removing existing exemptions)	25%	3/12/25	N/A	Section 232 of the Trade Expansion Act of 1962 (Section 232)
Aluminum Tariffs	Aluminum and aluminum derivatives	All (by removing existing exemptions)	25%	3/12/25	N/A	Section 232
Pending/Temporarily Suspended						
Mexico Tariffs	Goods that satisfy USMCA rules of origin	Mexico	25%	4/2/25 (suspended on 3/6/25)	N/A	IEEPA
Canada Tariffs	Goods that satisfy USMCA rules of origin	Canada	25%	4/2/25 (suspended on 3/6/25)	N/A	IEEPA

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Tariff Description	U.S. Imports/Goods Affected	Countr(ies) of Origin	Rate ⁶	Effective Date(s)	Expiration Date	Statutory Authorit(ies)
Reciprocal Tariffs	Potentially All	Potentially All	TBD	4/2/25 ¹⁰ or later ¹¹	N/A	Possibly IEEPA, Section 232, and/or Section 301 of the Trade Act of 1974 (Section 301)
Venezuelan Oil Tariffs	Potentially All	Countries importing Venezuelan oil, in the Secretary of State's discretion	25%	4/2/25 or later	One year after a country ceases importing Venezuelan Oil	IEEPA
Automobile Tariffs	Automobiles and automobile parts	All	25%	4/3/2025 – automobiles No later than 5/3/2025 – certain automobile parts	N/A	Section 232
In Development						
Chinese Semiconductors Investigation	Semiconductor industry	China	TBD	3/19/25 (post-hearing comments due)	TBD	Section 301
Chinese Shipbuilding Investigation	Maritime, logistics, and shipbuilding sectors	China	TBD	3/24/25 (comments due)	TBD	Section 301
America First Trade Policy	TBD (reviews of the trade-deficit, potential tariffs/countervailing duties, and other trade measures)	Potentially All	TBD	4/1/25 (various reports due)	TBD	Section 232, Section 301
Digital Services Taxes Investigations	TBD (reviews of foreign taxes and regulations on American digital services, cross-border data flows, and intellectual property)	Potentially All (memorandum references the European Union, Canada, Turkey, and the United Kingdom)	TBD	4/1/25 (various reports due)	TBD	Section 232, Section 301
Copper Tariffs	Copper and copper derivatives	Potentially All	TBD	11/22/25 (investigation due to be completed)	TBD	Section 232
Timber Tariffs	Timber, lumber, and their derivative products	Potentially All	TBD	11/26/25 (investigation due to be completed)	TBD	Section 232

ENDNOTES

- 1 <https://www.whitehouse.gov/presidential-actions/2025/03/imposing-tariffs-on-countries-importing-venezuelan-oil/>.
- 2 *Id.*
- 3 <https://www.marketwatch.com/story/trump-plans-secondary-tariffs-on-buyers-of-venezuelan-oil-its-a-new-untested-tactic-6cc0f74b>.
- 4 <https://www.whitehouse.gov/presidential-actions/2025/03/imposing-tariffs-on-countries-importing-venezuelan-oil/>.
- 5 <https://www.bloomberg.com/news/articles/2025-03-27/secondary-tariffs-how-trump-plans-to-punish-venezuelan-oil-buyers>.
- 6 All rates are additional to any existing tariffs.
- 7 In most cases, the *de minimis* exception allows for duty-free importation of goods by one person on one day with a value of less than \$800. See 19 U.S.C. § 1321(a)(2)(c).
- 8 The *de minimis* exception “shall cease to be available for such articles upon notification by the Secretary of Commerce to the President that adequate systems are in place to fully and expediently process and collect tariff revenue.”
- 9 Preferential tariff treatment is provided for in the USMCA for goods: wholly obtained or produced entirely in the territory of one or more of the countries; produced entirely in the territory of one or more USMCA countries, exclusively from originating materials; or produced entirely in the territory of one or more of the countries and the good satisfies other applicable requirements.
- 10 <https://www.ap.org/news-highlights/spotlights/2025/trump-plans-tariffs-on-mexico-and-canada-for-tuesday-while-doubling-existing-10-tariffs-on-china/>.
- 11 The memorandum directs the Secretary of Commerce and the United States Trade Representative to, “[a]fter the submission of the [America First Trade Policy] reports due” on April 1, “investigate the harm to the United States from any non-reciprocal trade arrangements adopted by any trading partners.” Those “report[s] detailing proposed remedies in pursuit of reciprocal trade relations with each trading partner” do not have a due date, but President Trump has signaled that he will impose some of these reciprocal duties on April 2, 2025.

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