

April 14, 2025

## S&C Tariffs Tracker (Updated)

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### President Trump Exempts Certain Electronics from “Reciprocal” Tariffs

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#### SUMMARY

On April 11, 2025, President Donald J. Trump issued a presidential memorandum (the “Memorandum”) exempting smartphones, laptop computers, and some other electronic devices from the 10% baseline and the 125% China-specific “reciprocal” tariffs currently in effect.<sup>1</sup> Among the other electronics included in the exemption were semiconductors, solar cells, flat-panel TV displays, flash drives, memory cards, and solid-state drives used for storing data.

Following the President’s Memorandum, U.S. Customs and Border Protection (“CBP”) issued updated guidance specifying the codes under the Harmonized Tariffs Schedule of the United States to which the exemption applies.<sup>2</sup> These items will be excluded from the reciprocal tariffs *retroactively* as of 12:01 a.m. on April 5, 2025.<sup>3</sup> Any duties that were collected on these goods on or after April 5, 2025 will be refunded in accordance with the CBP’s “standard procedures for such refunds.”<sup>4</sup> U.S. Commerce Secretary Howard Lutnick, however, stated that smartphones and other electronics will be included in semiconductor-related tariffs that are likely to be announced in the next month or two.<sup>5</sup>

These electronic devices, however, are still subject to the 20% China-specific tariffs imposed through the President’s orders dated [February 1, 2025](#) and [March 3, 2025](#), related to the President’s declaration of a national emergency related to fentanyl trafficking.<sup>6</sup> On the same day the White House announced this latest exemption, tariff escalations between the U.S. and China continued, with China announcing that it was raising its tariffs on U.S. goods to 125%.<sup>7</sup>

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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New York   Washington, D.C.   Los Angeles   Palo Alto   London   Paris   Frankfurt   Brussels  
Tokyo   Hong Kong   Beijing   Melbourne   Sydney

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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 <sup>8</sup>	Effective Date(s)	Expiration Date	Statutory Authorit(ies)
<b>Already in Effect</b>						
<a href="#">Reciprocal Tariffs (baseline)</a>	Most goods (with exceptions, including smartphones, computers, and some other electronic devices) <sup>9</sup>	All (except Canada, Mexico, and China)	10%	4/5/25	N/A ( <i>de minimis</i> exception to be suspended upon notification by Commerce)	International Emergency Economic Powers Act (IEEPA)
<a href="#">China Tariffs</a>	All goods (except in <i>de minimis</i> quantities and other limited exceptions) <sup>10</sup>	China	10%	2/4/25	N/A ( <i>de minimis</i> exception to end on 5/2/2025) <sup>11</sup>	IEEPA
<a href="#">Additional 10% China Tariffs</a>	All goods (except in <i>de minimis</i> quantities and other limited exceptions)	China	10%	3/4/25	N/A ( <i>de minimis</i> exception to end on 5/2/2025)	IEEPA
<a href="#">Reciprocal 125% China Tariffs (country-specific)</a>	All goods (except in <i>de minimis</i> quantities and other limited exceptions, including smartphones, computers, and some other electronic devices) <sup>12</sup>	China	125% (total 145%)	4/10/25	N/A ( <i>de minimis</i> exception to end on 5/2/2025)	IEEPA
<a href="#">Mexico Tariffs</a>	Goods that do not satisfy U.S.-Mexico-Canada Agreement (USMCA) rules of origin <sup>13</sup> (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
<a href="#">Canada Tariffs</a>	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

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Tariff Description	U.S. Imports/Goods Affected	Countr(ies) of Origin	Rate <sup>8</sup>	Effective Date(s)	Expiration Date	Statutory Authorit(ies)
<a href="#">Steel Tariffs</a>	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)
<a href="#">Aluminum Tariffs</a>	Aluminum and aluminum derivatives	All (by removing existing exemptions)	25%	3/12/25	N/A	Section 232
<a href="#">Automobile Tariffs</a>	Automobiles and automobile parts	All	25%	4/3/2025 (automobiles)  No later than 5/3/2025 (certain automobile parts)	N/A	Section 232
<b>Pending/Temporarily Suspended</b>						
<a href="#">Reciprocal Tariffs (country-specific)</a>	Most goods (with exceptions, including smartphones, computers, and some other electronic devices) <sup>14</sup>	TBD (original order named 56 countries and the EU. Negotiations ongoing.)	Variable for named countries	7/9/25 (suspended on 4/9/2025 except for China)	N/A ( <i>de minimis</i> exception to be suspended upon notification by Commerce)	IEEPA
<a href="#">Venezuelan Oil Tariffs</a>	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
<a href="#">Mexico Tariffs</a>	Goods that satisfy USMCA rules of origin	Mexico	25%	TBD (suspended on 3/6/25)	N/A	IEEPA
<a href="#">Canada Tariffs</a>	Goods that satisfy USMCA rules of origin	Canada	25%	TBD (suspended on 3/6/25)	N/A	IEEPA
<b>In Development</b>						
<a href="#">Chinese Semiconductors Investigation</a>	Semiconductor industry	China	TBD	TBD	TBD	Section 301
<a href="#">Chinese Shipbuilding Investigation</a>	Maritime, logistics, and shipbuilding sectors	China	TBD	TBD	TBD	Section 301

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Tariff Description	U.S. Imports/Goods Affected	Countr(ies) of Origin	Rate <sup>8</sup>	Effective Date(s)	Expiration Date	Statutory Authorit(ies)
<a href="#">America First Trade Policy</a>	TBD (reviews of the trade deficit, potential tariffs/countervailing duties, and other trade measures)	Potentially all	Various	TBD	TBD	Section 232, Section 301
<a href="#">Digital Services Taxes Investigations</a>	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	TBD	TBD	Section 232, Section 301
<a href="#">Copper Tariffs</a>	Copper and copper derivatives	Potentially all	TBD	11/22/25 (investigation due to be completed)	TBD	Section 232
<a href="#">Timber Tariffs</a>	Timber, lumber, and their derivative products	Potentially all	TBD	11/26/25 (investigation due to be completed)	TBD	Section 232
<a href="#">Pharmaceutical Tariffs</a>	Foreign-manufactured medicines	Potentially all	TBD	TBD	TBD	TBD

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ENDNOTES

- 1 <https://www.whitehouse.gov/presidential-actions/2025/04/clarification-of-exceptions-under-executive-order-14257-of-april-2-2025-as-amended/>. See <https://www.bbc.com/news/articles/c20xn626y81o>.
- 2 <https://content.govdelivery.com/accounts/USDHSCBP/bulletins/3db9e55>.
- 3 *Id.*
- 4 <https://www.whitehouse.gov/presidential-actions/2025/04/clarification-of-exceptions-under-executive-order-14257-of-april-2-2025-as-amended/>.
- 5 <https://www.msn.com/en-us/money/companies/tariff-exemptions-for-electronics-may-not-last-commerce-secretary-says/ar-AA1CPY2V?ocid=BingNewsSerp>.
- 6 <https://www.bbc.com/news/articles/c20xn626y81o>.
- 7 <https://www.cbsnews.com/news/china-says-it-will-raise-tariffs-on-u-s-goods-to-125/>.
- 8 Most rates are additional to any existing tariffs.
- 9 The April 2, 2025 executive order exempts: articles subject to 50 USC 1702(b); products already subject to Section 232 tariffs including steel and aluminum articles, and automobiles and automobile parts; copper, pharmaceuticals, semiconductors, and lumber articles, which the Administration is considering additional tariffs on; other articles that become subject to future Section 232 tariffs; bullion; and energy and other certain minerals that are not available in the United States. See <https://www.whitehouse.gov/fact-sheets/2025/04/fact-sheet-president-donald-j-trump-declares-national-emergency-to-increase-our-competitive-edge-protect-our-sovereignty-and-strengthen-our-national-and-economic-security/>; <https://www.whitehouse.gov/wp-content/uploads/2025/04/Annex-II.pdf>. The April 11, 2025 presidential memorandum exempts smartphones and other electronic devices. See <https://www.whitehouse.gov/presidential-actions/2025/04/clarification-of-exceptions-under-executive-order-14257-of-april-2-2025-as-amended/>.
- 10 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).
- 11 President Trump is ending the *de minimis* exception for covered goods from China and Hong Kong on May 2, 2025. See <https://www.whitehouse.gov/presidential-actions/2025/04/further-amendment-to-duties-addressing-the-synthetic-opioid-supply-chain-in-the-peoples-republic-of-china-as-applied-to-low-value-imports/>. In addition to imposing a 30% *ad valorem* duty on postal items containing goods for merchandise, the April 2, 2025 order closing the *de minimis* exception imposed a \$25 duty on such items from May 2, 2025 until June 1, 2025, and then raised that rate to \$50 per item after June 1. President Trump further raised the rate to 120% and the final per postal item duty to \$200 in his April 9, 2025 Order.
- 12 [https://content.govdelivery.com/bulletins/gd/USDHSCBP-3db9e55?wqt\\_ref=USDHSCBP\\_WIDGET\\_2](https://content.govdelivery.com/bulletins/gd/USDHSCBP-3db9e55?wqt_ref=USDHSCBP_WIDGET_2).
- 13 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.
- 14 <https://www.whitehouse.gov/presidential-actions/2025/04/clarification-of-exceptions-under-executive-order-14257-of-april-2-2025-as-amended/>.

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