

April 9, 2025

## S&C Tariffs Tracker (Updated)

---

### President Trump Imposes Additional Tariff on China as Reciprocal Tariffs Go into Effect

---

#### SUMMARY

New tariffs previously announced by President Donald J. Trump went into effect this week, including (1) broad 10% “reciprocal” tariffs on goods imported into the United States, and (2) higher country-specific tariffs for goods originating from 57 countries.<sup>1</sup> These measures took effect on April 5, 2025 and April 9, 2025, respectively.

In response, some countries have imposed or threatened to impose retaliatory tariffs on goods from the United States, whereas other countries are reportedly looking to negotiate over the tariffs. China retaliated by announcing a 34% tariff on U.S. goods, which is scheduled to take effect on April 10, 2025.<sup>2</sup> China’s Ministry of Commerce also placed 11 U.S. companies on an “unreliable entities” list, which effectively prohibits them from conducting business in the country.<sup>3</sup> On April 9, 2025, the European Union announced retaliatory tariffs on goods from the United States worth €22 billion (\$24.3 billion), which are scheduled to take effect on April 15, 2025.<sup>4</sup>

In response to China’s retaliatory tariff announcement, President Trump imposed an additional 50% tariff on goods from China, effective April 9, 2025, based on China’s failure to withdraw its retaliatory 34% tariff. China responded on April 9 by further raising its tariffs on goods from the United States to 84%.<sup>5</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 periodically update this tracker based on further developments, and our team is available should you have questions regarding the tariffs’ applicability.

---

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

# SULLIVAN & CROMWELL LLP

## TRACKER

Tariff Description	U.S. Imports/Goods Affected	Country(ies) of Origin	Rate <sup>6</sup>	Effective Date(s)	Expiration Date	Statutory Authorit(ies)
<b>Already in Effect</b>						
<a href="#">China Tariffs</a>	All goods (except in <i>de minimis</i> quantities and other limited exceptions) <sup>7</sup>	China	10%	2/4/25	N/A ( <i>de minimis</i> exception to end on 5/2/2025) <sup>8</sup>	International Emergency Economic Powers Act (IEEPA)
<a href="#">Additional 10% China Tariffs</a>	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 end on 5/2/2025)	IEEPA
<a href="#">Additional 50% China Tariffs</a>	All goods (except in <i>de minimis</i> quantities and other limited exceptions)	China	50% (total 70%)	4/9/25	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>9</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
<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

# SULLIVAN & CROMWELL LLP

Tariff Description	U.S. Imports/Goods Affected	Countr(ies) of Origin	Rate <sup>6</sup>	Effective Date(s)	Expiration Date	Statutory Authorit(ies)
<a href="#">Reciprocal Tariffs</a>	Most goods (with exceptions) <sup>10</sup>	All (except Canada and Mexico)	10% baseline Variable for named countries	4/5/25 (10% minimum rate)  4/9/2025 (country-specific tariffs)	N/A  ( <i>de minimis</i> exception to be suspended upon notification by Commerce)	IEEPA
<b>Pending/Temporarily Suspended</b>						
<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
<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

# SULLIVAN & CROMWELL LLP

Tariff Description	U.S. Imports/Goods Affected	Countr(ies) of Origin	Rate <sup>6</sup>	Effective Date(s)	Expiration Date	Statutory Authorit(ies)
<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

\* \* \*

ENDNOTES

- 1 <https://www.whitehouse.gov/presidential-actions/2025/04/regulating-imports-with-a-reciprocal-tariff-to-rectify-trade-practices-that-contribute-to-large-and-persistent-annual-united-states-goods-trade-deficits/>.  
The countries subject to specific rates are Algeria (30%), Angola (32%), Bangladesh (37%), Bosnia and Herzegovina (36%), Botswana (38%), Brunei (24%), Cambodia (49%), Cameroon (12%), Chad (13%), China (34%), Côte d'Ivoire (21%), Democratic Republic of the Congo (11%), Equatorial Guinea (13%), European Union (20%), Falkland Islands (42%), Fiji (32%), Guyana (38%), India (27%), Indonesia (32%), Iraq (39%), Israel (17%), Japan (24%), Jordan (20%), Kazakhstan (27%), Laos (48%), Lesotho (50%), Libya (31%), Liechtenstein (37%), Madagascar (47%), Malawi (18%), Malaysia (24%), Mauritius (40%), Moldova (31%), Mozambique (16%), Myanmar (Burma) (45%), Namibia (21%), Nauru (30%), Nicaragua (19%), Nigeria (14%), North Macedonia (33%), Norway (16%), Pakistan (30%), Philippines (18%), Serbia (38%), South Africa (31%), South Korea (26%), Sri Lanka (44%), Switzerland (32%), Syria (41%), Taiwan (32%), Thailand (37%), Tunisia (28%), Vanuatu (23%), Venezuela (15%), Vietnam (46%), Zambia (17%), Zimbabwe (18%).
- 2 <https://www.nbcnews.com/news/world/china-hits-back-trump-34-tariff-us-imports-rcna199665>.
- 3 <https://www.businessinsider.com/trump-tariffs-global-response-countries-liberation-day-2025-4>.
- 4 <https://www.euractiv.com/section/economy-jobs/news/eu-greenlights-e22-billion-retaliatory-tariffs-against-us/>; [https://ec.europa.eu/commission/presscorner/detail/en/statement\\_25\\_1025](https://ec.europa.eu/commission/presscorner/detail/en/statement_25_1025).
- 5 <https://www.cnbc.com/2025/04/09/china-slaps-retaliatory-tariffs-of-84percent-on-us-goods-in-response-to-trump.html>.
- 6 Most 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 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/amendment-to-reciprocal-tariffs-and-updated-duties-as-applied-to-low-value-imports-from-the-peoples-republic-of-china/>.
- 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 The 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>.

# SULLIVAN & CROMWELL LLP

## ABOUT SULLIVAN & CROMWELL LLP

Sullivan & Cromwell LLP is a global law firm that advises on major domestic and cross-border M&A, finance, corporate and real estate transactions, significant litigation and corporate investigations, and complex restructuring, regulatory, tax and estate planning matters. Founded in 1879, Sullivan & Cromwell LLP has more than 900 lawyers on four continents, with four offices in the United States, including its headquarters in New York, four offices in Europe, two in Australia and three in Asia.

## CONTACTING SULLIVAN & CROMWELL LLP

This publication is provided by Sullivan & Cromwell LLP as a service to clients and colleagues. The information contained in this publication should not be construed as legal advice. Questions regarding the matters discussed in this publication may be directed to any of our lawyers or to any Sullivan & Cromwell LLP lawyer with whom you have consulted in the past on similar matters. If you have not received this publication directly from us, you may obtain a copy of any past or future publications by sending an e-mail to [SCPublications@sullcrom.com](mailto:SCPublications@sullcrom.com).