

April 22, 2025

S&C Tariffs Tracker (Updated)

Trump Administration Announces Fees on Chinese Ships and Planned Tariffs on Solar Panels from Southeast Asia

SUMMARY

The United States government announced two significant new and proposed trade measures in recent days potentially affecting goods, ships, and equipment originating in Asia:

- *First*, on April 17, 2025, the U.S. Trade Representative (“USTR”) published a notice in the Federal Register (i) imposing fees on Chinese-built and Chinese-owned ships docking in U.S. ports, and (ii) requesting public comment on proposed tariffs on Chinese cargo handling equipment, such as port cranes.¹ The actions follow a year-long USTR investigation under Section 301 of the Trade Act of 1974 (“Section 301”) into China’s maritime activities.
- *Second*, on April 21, 2025, the U.S. Department of Commerce announced proposed plans to impose tariffs up to 3,521% on solar panels from crystalline silicon photovoltaic cells and modules, which includes solar panels, imported from Cambodia, Malaysia, Thailand, and Vietnam.² The U.S. Department of Commerce’s final determinations also follow year-long anti-dumping and countervailing duty investigations under the Tariff Act of 1930.³

CHINESE SHIPS AND CARGO EQUIPMENT

On March 12, 2024, labor unions petitioned the USTR to investigate “the acts, policies, and practices of China to dominate the maritime, logistics, and shipbuilding sectors.”⁴ The USTR initiated its Section 301 investigation on April 17, 2024. During that investigation, the USTR “found that China’s targeting for dominance burdens or restricts U.S. commerce by undercutting business opportunities for and investments in the U.S. maritime, logistics, and shipbuilding sectors; restricting competition and choice; creating economic security risks from dependence and vulnerabilities in sectors critical to the functioning of the U.S. economy; and undermining supply chain resilience.”⁵

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The April 17 notice announced that the following non-cumulative fees will be imposed on maritime transport services:

- Phased fee on Chinese vessel operators and vessel owners: \$0 for the first 180 days after the notice's publication and then \$50 per net tonnage, which is a volumetric measure of the space available on the vessel for cargo transportation, with incremental increases over the next three years.
- Phased fee on Chinese-built vessels: \$0 for the first 180 days, with incremental increases over the next three years. The fee is based on the higher of (i) a fee based on the net tonnage of the vessel, which starts at \$18 per net ton on October 14, 2025 and increases to \$23 per net ton on April 17, 2026, with additional increases for the subsequent two years or (ii) a fee based on each container discharged, which starts at \$120 per container on October 14, 2025 and increases to \$153 per container on April 17, 2026, with additional increases for the subsequent two years. Certain Chinese-built vessels are exempted, including vessels arriving empty to transport exports and certain U.S.-owned companies' vessels, among other exceptions.
- Phased fee on vessel operators of foreign-built vehicle carriers (not limited to China): \$0 for the first 180 days and then \$150 per Car Equivalent Unit capacity of the entering foreign-built vehicle carrier. An operator can receive a fee remission for up to three years if they order and take delivery of a U.S.-built vessel of equivalent or greater capacity within that time period.

Additionally, after three years, the USTR will require the use of U.S. vessels for the maritime transport of a certain percentage of liquified natural gas exports.⁶

The USTR, consistent with President Trump's [April 9, 2025 Executive Order Restoring America's Maritime Dominance](#), also requested public comments on proposed tariffs on Chinese maritime equipment (e.g., containers, chassis parts, and ship-to-ship cranes) by May 19, 2025.⁷ The USTR requested that commenters "specifically address whether the action would be practicable or effective to obtain the elimination of China's acts, policies, and practices."⁸ The USTR will convene a public hearing on the proposed tariffs on May 19, 2025.

SOLAR PANELS FROM SOUTHEAST ASIA

The U.S. Department of Commerce's decision to impose tariffs on solar panels from Southeast Asia also follows a year-long investigation. On April 24, 2024, the American Alliance for Solar Manufacturing Trade Committee, which is a coalition of U.S. solar manufacturers, petitioned the Department to investigate unfair trade practices by Chinese solar panel makers with factories in Cambodia, Malaysia, Thailand, and Vietnam.⁹ The Department determined that imports of solar panels from these countries were being dumped into the U.S. market at artificially low prices, and that some companies in these countries were receiving subsidies from China.¹⁰ These investigations are "among the first [countervailing duty] investigations wherein Commerce has made an affirmative finding that companies received transnational subsidies."¹¹ The U.S. International Trade Commission ("ITC") has until June 2, 2025 to make its final injury determination.¹² If the ITC makes an affirmative country-specific final injury determination, then the U.S. Department of Commerce will issue the orders imposing tariffs. If the ITC makes a negative injury

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determination, then no orders will be issued. The ITC made an affirmative preliminary injury determination during these investigations.¹³

The Tariffs Tracker below 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.

TRACKER

Tariff Description	U.S. Imports/Goods Affected	Country(ies) of Origin	Rate ¹⁴	Effective Date(s)	Expiration Date	Statutory Authority(ies)
Already in Effect						
Reciprocal Tariffs (baseline)	Most goods (with exceptions, including smartphones, computers, and some other electronic devices) ¹⁵	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)
China Tariffs	All goods (except in <i>de minimis</i> quantities and other limited exceptions) ¹⁶	China	10%	2/4/25	N/A (<i>de minimis</i> exception to end on 5/2/2025) ¹⁷	IEEPA
Additional 10% China Tariffs	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
Reciprocal 125% China Tariffs (country-specific)	All goods (except in <i>de minimis</i> quantities and other limited exceptions, including smartphones, computers, and some other electronic devices) ¹⁸	China	125% (total 145%)	4/10/25	N/A (<i>de minimis</i> exception to end on 5/2/2025)	IEEPA
Service Fees on Chinese-Built and Chinese-Owned Vessels	Chinese-built and Chinese-owned vessels (with exceptions, including vessels that transport goods between U.S. domestic ports)	China	Varies depending on the characteristics of the vessel (\$0 for the first 180 days and increasing thereafter)	4/17/25	N/A	Section 301 of the Trade Act of 1974 (Section 301)

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Tariff Description	U.S. Imports/Goods Affected	Country(ies) of Origin	Rate ¹⁴	Effective Date(s)	Expiration Date	Statutory Authority(ies)
Service Fees on Foreign-Built Vehicle Carriers	Foreign-built vehicle carriers (fee remissions available for operators that order and take delivery of a U.S.-built vessel of equivalent or greater capacity within three years)	All	\$0 for the first 180 days and then \$150 per Car Equivalent Unit capacity of the entering foreign-built vehicle carrier	4/17/25	N/A	Section 301
Mexico Tariffs	Goods that do not satisfy U.S.-Mexico-Canada Agreement (USMCA) rules of origin ¹⁹ (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
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

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Tariff Description	U.S. Imports/Goods Affected	Countr(ies) of Origin	Rate ¹⁴	Effective Date(s)	Expiration Date	Statutory Authorit(ies)
Pending/Temporarily Suspended						
Solar Panel Tariffs	Crystalline silicon photovoltaic cells and modules (with limited exceptions)	Cambodia, Malaysia, Thailand, and Vietnam	Varies (could be up to 3,521%)	TBD (the U.S. International Trade Commission has until 6/2/25 to make a final determination)	N/A	Sections 303 and 731 of the Tariff Act of 1930
Reciprocal Tariffs (country-specific)	Most goods (with exceptions, including smartphones, computers, and some other electronic devices) ²⁰	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
Venezuelan Oil Tariffs	Potentially all	Countries importing Venezuelan oil, in the Secretary of State's discretion	25%	TBD	One year after a country ceases importing Venezuelan Oil	IEEPA
Mexico Tariffs	Goods that satisfy USMCA rules of origin	Mexico	25%	TBD (suspended on 3/6/25)	N/A	IEEPA
Canada Tariffs	Goods that satisfy USMCA rules of origin	Canada	25%	TBD (suspended on 3/6/25)	N/A	IEEPA
In Development						
Semiconductor Investigation	Semiconductors, semiconductor manufacturing equipment, and their derivative products	Potentially all	TBD	TBD	TBD	Section 232
Chinese Semiconductor Investigation	Semiconductor industry	China	TBD	TBD	TBD	Section 301
America First Trade Policy	TBD (reviews of the trade deficit, potential tariffs/countervailing duties, and other trade measures)	Potentially all	Various	TBD	TBD	Section 232, Section 301

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Tariff Description	U.S. Imports/Goods Affected	Countr(ies) of Origin	Rate ¹⁴	Effective Date(s)	Expiration Date	Statutory Authorit(ies)
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	TBD	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
Pharmaceutical Investigation	Pharmaceuticals, pharmaceutical ingredients, and their derivative products (including both finished generic and non-generic drug products, medical countermeasures, critical inputs such as active pharmaceutical ingredients and key starting materials, and derivative products of those items)	Potentially all	TBD	TBD	TBD	Section 232
Critical Minerals Investigation	Processed critical minerals and their derivative products	Potentially all	TBD	TBD	TBD	Section 232
Chinese Cargo Handling Equipment	Cargo handling equipment, including ship-to-shore cranes	China	Up to 100% ²¹	TBD (public hearing to occur on May 19, 2025)	TBD	Section 301

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ENDNOTES

- 1 <https://ustr.gov/sites/default/files/files/Press/Releases/2025/301%20Ships%20-%20Action%20FRN%204-17.pdf>.
- 2 <https://www.msn.com/en-us/money/companies/us-sets-tariffs-of-up-to-3521-on-south-east-asia-solar-panels/ar-AA1DmAE?ocid=BingNewsSerp>; <https://www.trade.gov/final-affirmative-determinations-antidumping-and-countervailing-duty-investigations-crystalline>.
- 3 <https://americansolartradecmte.org/press-release-commerce-gives-us-solar-manufacturers-decisive-victory-in-solar-ad-cvd-final-determinations/>; <https://www.trade.gov/final-affirmative-determinations-antidumping-and-countervailing-duty-investigations-crystalline>.
- 4 <https://ustr.gov/sites/default/files/files/Press/Releases/2025/301%20Ships%20-%20Action%20FRN%204-17.pdf>; see <https://ustr.gov/issue-areas/enforcement/section-301-investigations/section-301-chinas-targeting-maritime-logistics-and-shipbuilding-sectors-dominance>.
- 5 <https://ustr.gov/about-us/policy-offices/press-office/press-releases/2025/february/ustr-seeks-public-comment-proposed-actions-section-301-investigation-chinas-targeting-maritime>.
- 6 <https://ustr.gov/sites/default/files/files/Press/Releases/2025/301%20Ships%20-%20Action%20FRN%204-17.pdf>.
- 7 <https://ustr.gov/sites/default/files/files/Press/Releases/2025/301%20Ships%20-%20Action%20FRN%204-17.pdf>; <https://www.whitehouse.gov/presidential-actions/2025/04/restoring-americas-maritime-dominance/>.
- 8 <https://ustr.gov/sites/default/files/files/Press/Releases/2025/301%20Ships%20-%20Action%20FRN%204-17.pdf>.
- 9 <https://americansolartradecmte.org/press-release-commerce-gives-us-solar-manufacturers-decisive-victory-in-solar-ad-cvd-final-determinations/>; <https://www.cnn.com/2025/04/22/business/us-tariffs-southeast-asia-solar-panels-intl/index.html>.
- 10 <https://www.trade.gov/press-release/opa-us-department-commerce-announces-final-determinations-antidumping-and>.
- 11 <https://www.trade.gov/press-release/opa-us-department-commerce-announces-final-determinations-antidumping-and>.
- 12 <https://www.trade.gov/press-release/opa-us-department-commerce-announces-final-determinations-antidumping-and>.
- 13 https://www.usitc.gov/press_room/news_release/2024/er0607_65269.htm.
- 14 Most rates are additional to any existing tariffs.
- 15 The April 2, 2025 executive order exempts: articles subject to 50 U.S.C. § 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, on which the Trump Administration is considering additional tariffs; 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/>.

ENDNOTES (CONTINUED)

- ¹⁶ 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).
- ¹⁷ 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 *ad valorem* duty to 120% and the final per-postal-item duty to \$200 in his April 9, 2025 Order.
- ¹⁸ https://content.govdelivery.com/bulletins/gd/USDHSCBP-3db9e55?wgt_ref=USDHSCBP_WIDGET_2.
- ¹⁹ 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.
- ²⁰ <https://www.whitehouse.gov/presidential-actions/2025/04/clarification-of-exceptions-under-executive-order-14257-of-april-2-2025-as-amended/>.
- ²¹ <https://ustr.gov/sites/default/files/files/Press/Releases/2025/301%20Ships%20-%20Action%20FRN%204-17.pdf>.

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