

March 12, 2025

## S&C Tariffs Tracker (Updated)

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### U.S. Steel and Aluminum Tariffs Go into Effect; EU Announces Retaliatory Tariffs

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#### SUMMARY

On March 12, 2025, President Donald J. Trump's [previously announced steel and aluminum tariffs](#) went into effect.<sup>1</sup> On March 11, 2025, President Trump had announced that he would raise the planned tariff rate for steel and aluminum products of Canada from 25% to 50% in response to the Province of Ontario's recent retaliatory surcharges on U.S. electricity imports. Later the same day, however, the Ontario Premier rescinded the surcharges, and the Trump administration responded by stating that it would implement the lower 25% rate.<sup>2</sup>

On the same day as the U.S. tariffs went into effect, the European Union ("EU") announced countermeasures in response to the "unjustified U.S. tariffs on EU steel and aluminum imports."<sup>3</sup> The EU's response aims to apply to U.S. goods imported into the EU worth up to €26 billion, matching the economic scope of the U.S. tariffs.

Specifically, the EU's countermeasures are to be implemented as follows:

- First, the EU will reinstate tariffs previously imposed in 2018 and 2020, as of April 1, 2025. As previously reported, these tariffs target a broad range of U.S. products such as steel, sweet corn, peanut butter, clothing, motorbikes, tobacco and bourbon. The tariffs are now expected to affect U.S. products worth up to €8 billion.<sup>4</sup>
- Second, the EU is preparing a new package of countermeasures on U.S. imports to the EU that are expected to come into force by April 13, 2025, following a consultation of stakeholders (anyone who is affected by the EU's response) running until March 26, 2025.<sup>5</sup> This package is expected to affect a broad range of U.S. products worth up to €18 billion.<sup>6</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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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>7</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>8</sup>	China	10%	2/4/25	N/A ( <i>de minimis</i> exception to be suspended upon notification by Commerce) <sup>9</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 be suspended upon notification by Commerce)	IEEPA
<a href="#">Mexico Tariffs</a>	Goods that do not satisfy U.S.-Mexico-Canada Agreement (USMCA) rules of origin <sup>10</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
<b>Pending/Temporarily Suspended</b>						
<a href="#">Mexico Tariffs</a>	Goods that satisfy USMCA rules of origin	Mexico	25%	4/2/25 (suspended on 3/6/25)	N/A	IEEPA
<a href="#">Canada Tariffs</a>	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 <sup>7</sup>	Effective Date(s)	Expiration Date	Statutory Authorit(ies)
<a href="#">Reciprocal Tariffs</a>	Potentially All	Potentially All	TBD	4/2/25 <sup>11</sup> or later <sup>12</sup>	N/A	Possibly IEEPA, Section 232, and/or Section 301 of the Trade Act of 1974 (Section 301)
<b>In Development</b>						
<a href="#">Chinese Semiconductors Investigation</a>	Semiconductor industry	China	TBD	3/19/25 (post-hearing comments due)	TBD	Section 301
<a href="#">Chinese Shipbuilding Investigation</a>	Maritime, logistics, and shipbuilding sectors	China	TBD	3/24/25 (comments due)	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	TBD	4/1/25 (various reports due)	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	4/1/25 (various reports due)	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

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ENDNOTES

- 1 [Implementation of Duties on Steel Pursuant to Proclamation 10896 Adjusting Imports of Steel Into the United States](#), 90 Fed. Reg. 11,249 (Mar. 5, 2025); [Implementation of Duties on Aluminum Pursuant to Proclamation 10895 Adjusting Imports of Aluminum Into the United States](#), 90 Fed. Reg. 11,251 (Mar. 5, 2025).
- 2 <https://www.cnbc.com/2025/03/11/trump-raises-canadian-steel-aluminum-tariffs-to-50percent-in-retaliation-for-ontario-energy-duties.html>.
- 3 [https://ec.europa.eu/commission/presscorner/detail/en/ip\\_25\\_740](https://ec.europa.eu/commission/presscorner/detail/en/ip_25_740).
- 4 For further background on these measures, see our previous S&C memo <https://www.sullcrom.com/SullivanCromwell/Assets/PDFs/Memos/Navigating-Transatlantic-Trade-Wars-Lessons-from-2018-Remedies-EU-Courts.pdf>.
- 5 [https://policy.trade.ec.europa.eu/consultations/information-gathering-notice-under-regulation-eu-no-6542014-new-us-tariffs-steel-and-aluminium\\_en](https://policy.trade.ec.europa.eu/consultations/information-gathering-notice-under-regulation-eu-no-6542014-new-us-tariffs-steel-and-aluminium_en).
- 6 The list of U.S. products potentially affected includes industrial and agricultural products and can be consulted [here](#).
- 7 All rates are additional to any existing tariffs.
- 8 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).
- 9 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 expeditiously process and collect tariff revenue.”
- 10 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.
- 11 <https://www.ap.org/news-highlights/spotlights/2025/trump-plans-tariffs-on-mexico-and-canada-for-tuesday-while-doubling-existing-10-tariffs-on-china/>.
- 12 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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