

CUSTOMER ADVISORY

New Tariff Actions and Industry Impact
16 APRIL 2025



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Investigations Initiated by the Bureau of Industry and Security under Section 232

The U.S. Bureau of Industry and Security (BIS), which is an entity of the United States Government under the U.S. Department of Commerce, has announced investigations under Section 232 of the Trade Expansion Act of 1962, with public comments to be submitted by May 7th, 2025, regarding imports of:

- (i) Semiconductors and Semiconductor Manufacturing Equipment
[Federal Register Notice published on April 16, 2025](#)
- (ii) Pharmaceuticals and Pharmaceutical Ingredients
[Federal Register Notice published on April 16, 2025](#)

The intent of which is to assess how the Department of Commerce may impose tariffs on these goods, according to the Commerce Secretary Howard Lutnick, to encourage reshoring these industries, essential to our national security. Part of this effort is also explained under [Executive Order](#) of April 1th, 2025, to improve access and deliver lower prescription drug prices to American patients.

- [Executive Order](#) has been issued on April 15th, 2025, to investigate under Sec. 232 and provide a report within 180 days, to determine whether imports of processed critical minerals and their derivative products threaten to impair national security. The report will make recommendations for action or inaction and shall consider:

- (i) The imposition of tariffs or other import restrictions, and appropriate levels;



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- (ii) Safeguards to prevent circumvention and ensure the integrity of Section 232 measures;
- (iii) Policies to incentivize domestic production, processing, and recycling;
- (iv) Additional measures to mitigate national security risks, under the President's authority pursuant to the International Emergency Economic Powers Act (IEEPA).

This initiative also supports efforts under the same Executive Order to improve access to, and reduce the cost of, prescription drugs for American patients.

A [lawsuit](#) has been filed on April 14th, 2025, by the Liberty Justice Center on behalf of five importers. The lawsuit challenges the constitutionality of using the IEEPA to impose tariffs by presidential authority.

[Executive Summary](#): A new report titled "*Report to the President on the America First Trade Policy*" has been published.

Reminder: Upcoming U.S. Customs and Border Protection (CBP) Webinars

All webinars begin at 1:30 p.m. Eastern Daylight Time (EDT):

- April 22, 2025 (Tuesday): [Seeing the Light: Optical Elements in Headings 9001–9005](#)
- April 23, 2025 (Wednesday): [Laminated Safety Glass: Windshields, Subheading 7007.21](#)
- April 24, 2025 (Thursday): [Going with the Flow: Pipes, Tubes, and Hollow Profiles](#)
- April 29, 2025 (Tuesday): [Heading 8477: Machines for Working Rubber or Plastics](#)
- May 14, 2025 (Wednesday): [Armed and Ready: The Arms and Ammunition of Chapter 93](#)
- May 21, 2025 (Wednesday): [Classification of Antiques of Heading 9706](#)
- May 22, 2025 (Thursday): [Decorative Articles of Ceramics of Heading 6913](#)
- May 28, 2025 (Wednesday): [Overview of 9404: Pillows, Mattresses, Quilted Bedding, etc.](#)

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