C.H. ROBINSON

Dude, what’s my Tariff? Managing Logistics in Turbulent Times

ISM Trade Policy Update – Jason Craig, Director of Government Affairs

Trade Policy Developments

Priorities for Tariffs

1. Win the economic and military competition with China
2. Bring strategic manufacturing back to the United States
3. Leverage for other issues

Ask Two Questions:

1. Are we still in the public policy discussion phase?
2. Are we in the policy implementation phase?

When Is It Official?

- ✓ Executive Order is published on the whitehouse,gov website
- ✓ Public notice is published in the Federal Register
- ✓ Cargo Systems Messaging Service (CSMS) message is

→Potential Trade Policy & Tariff Changes to Be Aware of in 2025

The new administration has proposed significant changes to U.S. trade policy in 2025. Some of the tools the President may use include:

Trade law enforcement tool	What is it?	What to expect
Section 122 of the Trade Act of 1974	• **Country specific** • Allows President to impose tariffs up to 15% on imports from one or more countries for 150 days.	→ **Has never been used to invoke tariffs before**. → Regulatory action through USTR; no congressional approval required. → May be implemented in 2025.
Section 232 of the Trade Expansion Act of 1962	• **Commodity specific;** invoked in 2018; effective Mar. 12, 2025, tariffs are 25% (steel) & 25% (aluminum) including steel derivatives & aluminum derivatives from **all countries.** • Requires an investigation by Department of Commerce (DOC) to find that imports threaten to impair U.S. national security.	→ **Currently in use**. → Regulatory action through USTR; requires positive DOC investigation. → May be implemented again in 2025; ongoing.
Section 301 of the Trade Act of 1974	• **Country specific;** invoked in 2018; tariffs are 7.5%-25% on certain products from China. • Requires an investigation by Office of the United States Trade Representative (USTR) to find that foreign countries violated U.S. trade agreements or engaged in "unjustifiable" or "unreasonable" acts and burden U.S. commerce.	→ **Currently in use**. → Regulatory action through USTR; requires positive USTR investigation. → May be implemented again; ongoing.
Section 338 of the Tariff Act of 1930	• **Country or country-group specific** • Allows President to impose tariffs up to 50% for unspecified duration if found that a foreign country has taken unreasonable or discriminatory actions that disadvantage U.S. commerce.	→ **Previously used to invoke tariffs before 1950**. → Regulatory action through USTR; no congressional approval required. → May be implemented in 2025.
International Emergency Economic Powers Act (IEEPA)	• **Invoked in February 2025**; baseline 10% tariff implemented in April 2025; country-specific tariffs **paused** until July 9, 2025; 125% tariff on imports from China **paused** and **replaced** with 10% tariff until August 12, 2025; fentanyl tariffs apply to Mexico, China, and Canada. • Authorizes President to regulate imports declared during a **national emergency.**	→ **Currently in place**. → Executive action solely by the President; no congressional approval required. → May be implemented again in 2025; ongoing.
United States-Mexico-Canada Act (USMCA)*	• USMCA is reviewed every **six years**; next review begins July 2025 and will be decided July 2026.	→ **Currently in place**. → Congressional action. → Review and decision: July 2025-July 2026.

**National law supersedes Free Trade Agreements (FTAs)*
Timelines and countries stated herein are subject to change and based on information compiled from sources that are, to the best of our knowledge, accurate and correct at the time of publishing this information.

C.H. ROBINSON

U.S. Tariff Timeline at a Glance

North America Customs News

View all tariff updates from this year and the latest tariff changes on the U.S. Tariff Timeline

JULY 31

IEEPA (fentanyl/migration)
All goods

Executive order issued raising the IEEPA fentanyl tariff to 35% on non-qualifying USMCA goods from Canada, effective August 1, 2025

JULY 31

IEEPA (reciprocal)
All goods

Country-specific tariff rates adjusted for most countries, effective August 7, 2025.

AUGUST 1

IEEPA (fentanyl/migration)
All goods

35% IEEPA tariff goes into effect for imports from Canada.

AUGUST 1

Section 232 (copper)
Semi-finished copper and intensive copper derivatives

50% tariff now in effect for semi-finished copper and intensive copper derivatives

AUGUST 6

IEEPA (foreign threats)
All goods

40% tariff now in effect for imports from Brazil. Both the 40% tariff and 10% IEEPA reciprocal tariff apply.

AUGUST 6

IEEPA (foreign threats)
All goods

Executive order issued imposing a 25% IEEPA tariff on imports from India, effective August 27, 2025

AUGUST 7

IEEPA (reciprocal)
All goods

Country-specific tariff rates from Annex I of the July 31, 2025, executive order now in effect.

AUGUST 11

IEEPA (reciprocal)
All goods

Executive order issued extending the 10% reciprocal tariff an additional 90 days for all goods from China.

AUGUST 27

IEEPA (foreign threats)
All goods

25% tariff goes into effect for imports from India. Both the 25% foreign threats tariff and 25% reciprocal tariff apply.

AUGUST 29

IEEPA (trade deficit)
All goods

De minimis exemption suspended for imports from all countries.

NOVEMBER 10

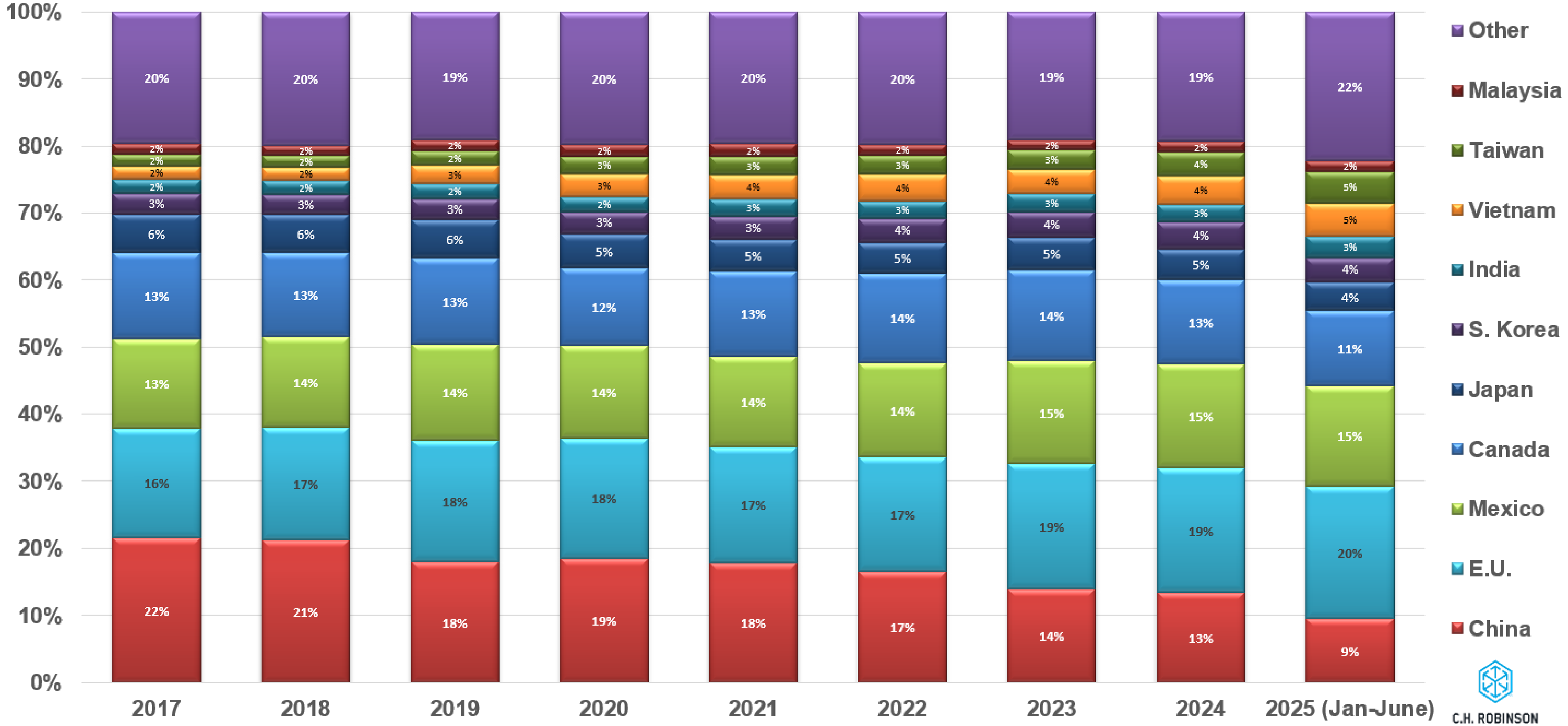
IEEPA (reciprocal)
All goods

90-day pause ends on 10% reciprocal tariff and increases to 34% for goods imported from China.

C.H. ROBINSON

Shifting sourcing patterns (US Imports from census data)

We always overestimate the change that will occur in the next two years and underestimate the change that will occur in the next ten. -Bill Gates



C.H. ROBINSON

→ Supply Chain = Sourcing + Transportation

Announced Deals

37.5-55% - China

20% - Vietnam
19% - Indonesia
19% - Philippines

15% - Japan & Korea
15% - EU
10% - UK

0% - USMCA certified

Sourcing	Transportation
China	Air
⇩	⇩
China Adjacent	Ocean
⇩	⇩
Friendshoring	LTL
⇩	⇩
Nearshoring	Truckload
⇩	⇩
Reshoring	Intermodal

IEEPA Court Case, Section 232, and China Maritime Fines

- IEEPA Reciprocal court case
  - "I have declared a national emergency arising from **conditions reflected in large and persistent annual U.S. goods trade deficits**" – Reciprocal Executive Order
  - Oral arguments are July 31 for appeals court hearing. SCOTUS is next stop (4Q 2025)
  - If struck down, **what does the duty refund process look like**?
    - Wall Street is offering to buy refund claims for 20-30% with immediate payment regardless of outcome
- Section 232 Investigations:
  - Copper
  - Lumber
  - Chips
  - Pharma
  - Heavy Trucks and truck parts
  - Rare Earths
  - Aerospace parts
  - Polysilicon (solar panel input)
  - Drones and parts
- Section 301 China Maritime Fines begin Oct 14
  - No direct impact to rates, some carriers will avoid fines completely.

C.H. ROBINSON

Customs Compliance: More Important and More Complicated!

- **Foreign Importer of Record (FIOR)**
  - Customs may eliminate FIOR
- **Customs Compliance**
  - Customs has loosened ACE controls due to complexity
    - Puts pressure on back-end audit compliance
  - DOJ involvement in customs compliance
    - Not just fines, now potential criminal penalties
- **De Minimis**
  - All de minimis ends Aug 29 by executive order
  - De Minimis ends in July 1, 2027 by Congress in One Big Beautiful Bill
- **Customs Capacity has been cut**
  - Customs Brokerage is now a competitive advantage!!

C.H. ROBINSON

What About those Trade Deals? Who Wins?

- **Announced "Investments"**
  - Japan $550 Billion
  - EU $600 Billion
  - Korea $350 Billion

- **Announced Energy Purchases (No Timelines)**
  - Japan $550 Billion
  - EU $750 Billion in "energy"
  - Korea $100 Billion in LNG

- **Where does this all go? How does it tie together?**
  - Scott Bessent's 3-3-3 Plan (Annual Deficit to 3% of GDP-3% Inflation-+3 Million barrels a day equivalent)
  - Jan 20 American Energy Executive Order
  - Feb 3 US Sovereign Wealth Fund Executive Order
  - July 23rd AI Action Plan

C.H. ROBINSON

U.S. Tariff Impact Analysis Tool Press Release

C.H. ROBINSON Services Carriers Technology Resources About Contact

Home > About > C.H. Robinson Global Newsroom > Press Releases > C.H. Robinson debuts self-serve tariff analysis tool

C.H. Robinson Debuts Self-Serve Tariff Analysis Tool, Empowering Shippers to Manage Costs and Navigate Market Volatility

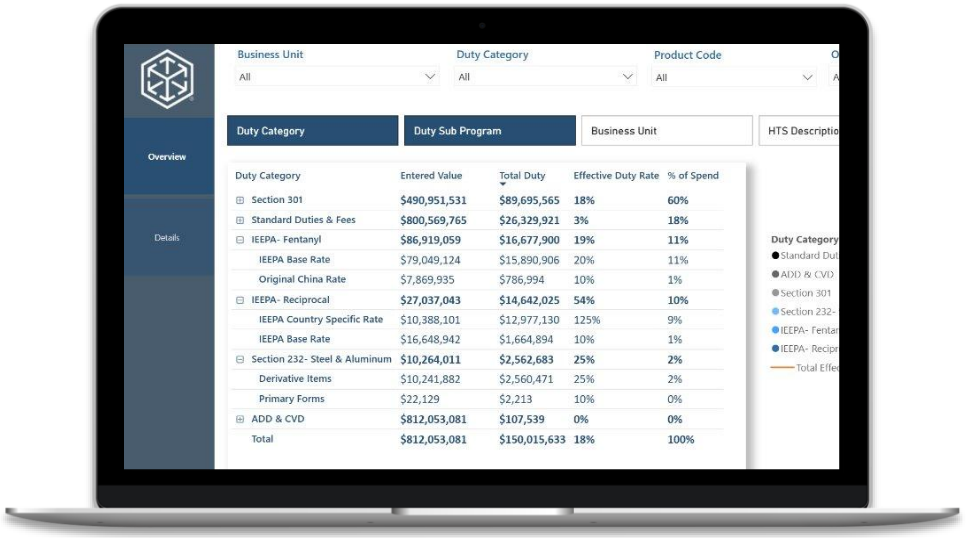
Latest innovation strengthens the global logistic leader's arsenal of customer-centric technology solutions

May 29, 2025 | Press Release

EDEN PRAIRIE, MINNESOTA, [May 29, 2025]—In the face of growing global trade tensions, shifting tariff policies, and rising cost pressures, global logistics leader C.H. Robinson today announced its new U.S. Tariff Impact Analysis tool to address the increasing needs of shippers navigating tariffs. Built for today's shifting trade environment, this customer-centric innovation empowers U.S. importers to assess their overall duty exposure and drill down to the SKU level for precise cost analysis.

Market volatility is a persistent challenge for global shippers. In just the past few months, shippers have faced a wave of evolving U.S. trade actions—from Section 301 and Section 232 duties to IEEPA reciprocal and fentanyl-related tariffs—with more changes expected. This makes it essential for importers to have self-serve technology that helps them accurately assess costs and optimize their strategies at speed.

"This tool makes navigating trade complexity faster and more effective," said Mike Short, President of Global Forwarding at C.H. Robinson. "Whether they're looking to reroute freight, consolidate entries,



Check out the press release and share with customers!

Enable the tool in Insight for U.S. customs brokerage customers so they can get access within 24 hours.