CIRCULAR INFORMATIVA No.153

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Ciudad de México, a 20 de octubre de 2025.

Asunto: Se informa el **seguimiento actualizado de los aranceles de la Orden Ejecutiva de 2025, incluyendo los nuevos aranceles de la Sección 232 para camiones y repuestos de servicio mediano y pesado.**

Por medio de la presente se da a conocer el **seguimiento actualizado de los aranceles de la Orden Ejecutiva de 2025 (con énfasis en México/Canadá), incluyendo los nuevos aranceles de la Sección 232 para camiones y repuestos de servicio mediano (MHDV) y pesado (MHDVP), así como autobuses (a nivel mundial), los cuales fueron anunciados el 17 de octubre y serán aplicables a partir del 1 de noviembre, el cual fue emitido de manera extraoficial por U.S Custums and Border Protection (CBP), destacándose lo siguiente:**

- **25 % para 25% MHDVs & MHDVPs**
- **10 % para MHDVs, incluidos en el Capítulo 8702 del HTS (Vehículos automotores diseñados para transportar a más de 10 personas, es decir, autobuses, minibuses y furgonetas)**

Lo anterior se hace de su conocimiento a fin de que lo tomen en consideración para el desarrollo de sus actividades, asimismo, se emite el documento **2025 EXECUTIVE ORDER TARIFFS / SUMMARY FOR MEXICO AND CANADA,** para mayor referencia, de igual manera quedamos a sus órdenes para cualquier duda o comentario, la Gerencia Jurídico Normativa de esta Confederación en el correo juridico@claa.org.mx.

Atentamente
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2025 EXECUTIVE ORDER TARIFFS / SUMMARY FOR MEXICO AND CANADA

Statutory Tariffs	***Duty Rate***	***Start Date***	***Notes***
Most Favored Nation Tariffs (Statutory)	Commodity Specific	N/A	MFN tariffs are set by law and ***are not*** excused / replaced by Exec. Order tariffs. Tariff rates vary by commodity [*ex.: toys: 0%, passenger vehicles: 2.5%, motorcycles: 3.7%, etc.*] Parties that receive trade agreement (*including USMCA*) preferential treatment have their MFN duties forgiven/reduced, based on specific agreement terms (Mexico / Canada: **General Note 11**).
2025 Executive Order Tariffs	***Duty Rate***	***Start Date***	***Notes***
Exec. Order 14289: 2025 E.O. Tariffs are **NOT** cumulative. (CSMS 65054270). **Proc.** 10947 and ____ updates the non-cumulative order of preference. Non-Cumulative 2025 E.O. Tariffs, in order of priority, include: • Sec. 232 Tariffs on automotive goods; • Sec. 232 Tariffs on steel, aluminum (AL), copper (CU), timber/lumber, and Medium and Heavy Duty Vehicles/Parts. • IEEPA Tariffs on Country-of-Origin Canada & Mexico, with continued USMCA reprieve. IEEPA reciprocal tariffs (if applicable) are cumulative (except in the case of Sec. 232 timber / lumber tariffs).			U.S. Ct. of Appeals for the Federal Circuit found use of IEEPA in this matter to exceed POTUS authority; [*V.O.S. Selections vs. U.S.* No. 25-1812 (Fed. Cir. Aug. 29, 2025) (per curium)]. Implementation stayed pending U.S. Supreme Ct. review (oral arguments on 5 Nov. 2025). Case applicable to IEEPA tariffs (Canada, MX, China, Reciprocal) & NOT Sec. 232 tariffs. (autos, steel, AL, CU, timber/lumber,). See CSMS 65201384 The non-cumulative nature of 2025 Exec. Order Tariffs does NOT excuse/replace other tariffs or duties. The 2025 Exec. Order Tariffs' non-cumulative nature applies retroactively to all entries of merchandise entered on or after 4 March 2025. Refunds to be processed pursuant to applicable laws and U.S. Customs and Border Protection's standard procedures for refunds. 90 FRN 18907; CSMS 64916414, 65054270, 65236574
Country-of-Origin – Mexico & Canada (IEEPA) **Exec. Order** (*Canada*):14193,14197, 14325 (*Mexico*):14194, 14198	**Canada:** 35% ad valorem (10% for Potash and Energy Products) **MX:** 25% ad valorem (10% for Potash Products) **FRNs:** **(*Canada*)** 90 **FR** 9113, 90 **FR** 9183, 90 **FR** 11423, 90 **FR** 37957 **(*Mexico*)** 90 **FR** 9117, 90 **FR** 9185, 90 **FR** 11429	4 March (MX and Canada 25%) 1 August (Canada 35%)	No Drawback. Reprieve for importers claiming USMCA preferential treatment. Country-of-Origin Canada goods determined to have been transshipped to evade applicable duties will be assessed an additional 40% ad valorem rate of duty. **CSMS**: (*Canada):* 63988467, 63991510, 64297449, 64336037; 65798609 (*MX)*: 64297292, 64335789, 65201384, 65201773
Reciprocal Tariffs (Worldwide) (IEEPA) **Exec. Order** 14257, **Exec. Order** 14259, **Exec. Order** 14316 **Exec. Order** 14326	10% worldwide tariff / additional tariffs on enumerated countries **FRNs:** 90 **FR** 15041, 90 **FR** 15509, 90 **FR** 30823 90 **FR** 37963 (annexes, with specific % for enumerated countries, 6 August 2025)	5 April (10% worldwide) 7 August (specific % for enumerated countries)	**10% baseline reciprocal tariffs do NOT apply to Mexico and Canada.** [*The IEEPA tariffs on Country-of-Origin Mexico (25%) and Canada (35%) goods still apply*]. Goods determined by CBP to have been transshipped to evade applicable IEEPA Reciprocal duties are subject to an additional 40% ad valorem duty. For subject articles that have least 20% U.S. content, IEEPA reciprocal tariffs will be assessed solely on the non-U.S. content. If the MX/CA exclusion is terminated, no IEEPA Reciprocal Duty Tariffs will be owed for goods receiving USMCA preferential treatment. For goods NOT receiving USMCA preferential treatment, an additional duty of 12% will be levied. (*not be applicable to goods entered under USMCA preferential treatment for Country-of-Origin U.S.*). A list of specific commodity types (high technology goods) are exempted (CSMS 64724565). **CSMS:** 64649265, 64687696, 64680374, 64701128, 64724565, 65201384, 65201773, 65572962, 65829726.

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2025 EXECUTIVE ORDER TARIFFS / SUMMARY FOR MEXICO AND CANADA

Executive Order Tariffs	*Duty Rate*	*Start Date*	*Notes*
Sec. 232 Tariffs on Automotive Goods (Worldwide) **Proc.** 10908 (26 March 2025) and **Amended Proc.** 10925 (29 April 2025)	**25%** ad valorem for automotive goods **FRN:** 90 **FR** 14705, 90 **FR** 21450, 90 **FR** 25027	3 April (Finished Autos) 3 May (Automotive Parts)	Automotive parts that claim USMCA preferential treatment continue to receive a reprieve on Sec. 232 tariffs for automotive goods. CSMS 64916652. Importers of final-assembly-in-MX vehicles claiming USMCA preferential treatment can seek the value of the finished auto's U.S. content subtracted from the overall calculation of value for tariff assessment, (*I.e. auto tariff will be 25% ad valorem of solely non-U.S. content*). Documentation to be submitted to U.S. Department of Commerce (Autos232USMCA@Trade.gov) (*For more details, see CSMS 64916652, 65054270, 65649652*). Where importers overstate value of U.S. content, tariffs will apply to the entire value of the good (retroactively to 3 April & prospectively until accurate U.S. value established). No Drawback. Temporary offsets available for foreign-produced automotive parts used in U.S.-assembled vehicles. Import adjustment offset amounts awarded for qualifying automobiles, assembled between 3 April 2025 and 30 April 2027, may be carried forward until the full approved import adjustment offset amount is exhausted. No new import adjustment offsets will be granted after 30 April 2027. (*Details and pts of contact in 90 FR 25027*) The Import Adjustment Offset amount calculated as a percentage of the aggregate Manufacturer's Suggested Retail Price (MSRP) value of automobiles assembled in the United States (3.75% of aggregate MSRP for eligible automobiles assembled btw 3 April 2025 & 30 April 2026; 2.5%; btw 1 May 2026 & 30 April 2027.). Import Adjustment Offset amounts may be used only by approved importers of record associated with the approved final producer and may not be traded, sold, or transferred. May be applied only to reduce Sec. 232 automotive tariff liability & may not exceed total Sec. 232 automotive tariff liability on covered parts. **CSMS:** 64624801; 64913145, 64916652 (with annex HTS list), 65054270, 65649652.
Sec. 232 Tariffs on Steel and Aluminum (Worldwide) **Proc.** 10896 (*Steel*) **Proc.** 10895 (*AL*) **Proc.** 10947 (Steel & AL)	50% for Steel / Derivative Steel **FRN:** 90 ***FR*** 9817, 90 **FR** 24199, 90 **FR** 25208 50% for AL / Derivative AL 90 **FR** 9807, 90 **FR** 14705, 90 **FR** 24199	12 March (25%) 4 June (50%)	USMCA preferential treatment does not excuse these tariffs; 2018 bilateral exemptions terminated. Non – steel / AL content contained in covered derivative articles are subject to IEEPA Reciprocal Tariffs. Steel derivative products expanded to include appliances (effective 23 June, per 90 FR 25208) **CSMS:** (Steel): 64348411; (AL): 64348411, 64605146, 64639013, 65236574, (Steel) 65236374, 65289012, 65405824, 65936570; (AL) 65236645, 65288784, 65340246, 65936615 [*Most recent HTS Annex published* (Steel) 18 Aug. 2025; (AL) 18 Aug. 2025]
Sec. 232 Tariff on Copper (Worldwide) **Exec. Order** 14420 **Proc.** 10962	50% for semi-finished CU products & intensive CU derivative products. 90 **FR** 11940 90 **FR** 37727	1 August	Duty based upon the value of the CU content. Non-CU content of all subject CU articles subject to any other import duties in effect, except goods subject to Sec. 232 duties on automotive / steel / AL (IEEPA 9903.01.33 exception). No drawback. **CSMS:** 65794272 [*Most recent HTS Annex published (for CU) 31 July 2025*]

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2025 EXECUTIVE ORDER TARIFFS / SUMMARY FOR MEXICO AND CANADA

2025 Executive Order Tariffs	*Duty Rate*	*Start Date*	*Notes*
Sec. 232 Tariffs on Timber / Lumber and Their Derivatives (Worldwide) **Proc.** 10976	**10%** ad valorem duty rate on softwood timber / lumber **25%** ad valorem duty rate on upholstered wooden products lines ➔ 30% on 1 January 2026 **25%** ad valorem duty rate on kitchen cabinets and vanities (completed & parts). ➔ 50% on 1 January 2026. 90 **FR** 48127	Overall: 14 Oct. 2025 Increased Rates: 1 January 2026	2025 Exec. Order Tariffs are not cumulative [(1) Sec. 232 autos take priority; (2) THEN Sec. 232 on timber / lumber; (3) THEN IEEPA Country of Origin Mexico / Canada.]. Goods subject to these Sec. 232 duties on timber lumber are not subject to the IEEPA reciprocal tariffs or enumerated IEEPA tariffs on Brazil & Russia. Tariffs are indefinite in nature, unless individual countries reach agreements addressing the threatened impairment of U.S. national security posed by imports of wood products. Drawback is allowed. **CSMS** 66492057
Sec. 232 Tariffs on Medium and Heavy-Duty Vehicles (MHDVs) Medium and Heavy-Duty Vehicle Parts (MHDVPs), and Buses (World Wide) **Proc. _____** (17 Oct. 2025)	**25%** MHDVs & MHDVPs **10%** MHDVs falling under HTS Ch. 8702 (Motor vehicles designed to transport 10+ people, i.e. buses, minibuses, & vans) **__ FR _____**	1 Nov. 2025	For finished MHDVs claiming USMCA / T-MEC preferential treatment, carve outs are envisioned for U.S. content, with process to be established via pending FRN; Sec. 232 duties shall then be applicable solely to non-U.S. content of the good. No Sec. 23 duties on individual MHDVPs claiming USMCA / T-MEC preferential treatment at this time (pending process, to be established via pending FRN, to apply the tariff exclusively to the value of the non-U.S. content of such MHDVP); pause in enforcement not applicable to MHDV knock-down kits or equivalent parts compilations, regardless of USMCA / T-MEC preferential treatment qualification. Offsets to be provided to final-assembly U.S. MHDVs producers USMCA / T-MEC qualifying parts, with process to be established via FRN. Offsets available until 31 Oct. 2030. Not applicable to MHDV knock-down kits or equivalent parts compilations, regardless of USMCA / T-MEC preferential treatment qualification. Sec. 232 duties not applicable to MHDVs / 10+ passenger vehicles manufactured 25+ years prior to entry. Importers have a choice between Sec. 232 duties in automotive goods or MHDVs/MHDVPs, with criteria provided (12) (a-c). As with other Sec. 232 tariffs, these duties are not cumulative. Limited drawback (manufacturing drawback) available. **CSMS: _____**

Potential Tariffs		
Additional Sec. 232 Tariffs (Worldwide); Pending U.S. Dept. of Commerce determinations		The U.S. Department of Commerce currently performs Sec. 232 investigations (via executive order or self-initiated) on a series of commodity types, which may result in Sec. 232 duties, details pending. Mexico and Canada are significant exporters of these commodity types to the United States.
90 **FR** 16437 (Critical Minerals) 90 **FR** 15950 (Pharmaceutical and Ingredients) 90 **FR** 15951 (Semi-Conductors) 90 **FRN** 20273 (Comercial Aircraft and Jet Engines)	90 **FR** 31955 (Polysilicon and Derivatives) 90 **FR** 31958 (Unmanned Aircraft Systems) 90 **FR** 41380 (Wind Turbines, Parts, Components) 90 **FR** 46382 (Robotics and Industrial Machinery) 90 **FR** 46383 (Medical Equipment / PPE / Consumables / Devices)	

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