

TRACKING TARIFFS DURING TRUMP 2.0 — SUMMER 2026 UPDATE

EXECUTIVE SUMMARY

Tariffs continue to anchor the Trump administration's domestic and foreign policy agenda in the second year of its second term. Since the Supreme Court invalidated the administration's use of the International Emergency Economic Powers Act (IEEPA) to impose its sweeping "reciprocal" tariffs in February, the White House has pursued an aggressive, multipronged effort to reconstruct the tariff regime under other statutory authorities.

The administration initially responded to the ruling by imposing a temporary 10 percent global import surcharge under Section 122 of the Trade Act of 1974. That measure provided a bridge while the Office of the United States Trade Representative (USTR), led by Ambassador Jamieson Greer, accelerated investigations under Section 301 of the Trade Act and the Department of Commerce continued sector-specific investigations under Section 232 of the Trade Expansion Act. When the Section 122 surcharge reached its statutory 150-day limit in July, USTR replaced it with Section 301 tariffs ranging from 10-12.5 percent on imports from 60 economies, citing their failure to prohibit and effectively enforce restrictions on the importation of goods produced with forced labor. In addition to Section 301, USTR is leveraging national-security tariffs under Section 232 and less frequently used authorities, such as Section 338 of the Tariff Act of 1930 to impose or threaten additional duties.

The summer 2026 update of TRP's Special Report examines the administration's efforts to replace the invalidated IEEPA tariffs, the expanding use of alternative trade authorities, and the tariff-related actions taken during the first half of 2026. It also provides an updated timeline and overview of the duties currently imposed or under consideration.

- **Section 301: Forced Labor Tariffs.** USTR imposed new Section 301 tariffs on imports from 60 economies based on findings that they do not adequately prohibit the export of goods produced with forced labor. A 10 percent tariff will apply to imports from Argentina, Bangladesh, Cambodia, Canada, Ecuador, El Salvador, Guatemala, Honduras, India, Indonesia, Jordan, Malaysia, Mexico, Pakistan, Sri Lanka, Trinidad and Tobago, and the United Kingdom. Certain products from the European Union (EU), Taiwan, Japan,

South Korea, and Switzerland will face duties of 10 percent or 12.5 percent, adjusted for existing most favored nation (MFN) rates, while imports from all other investigated economies will generally face a 12.5 percent tariff. USTR also exempted certain raw materials and products with limited domestic availability, goods that could cause broader economic disruptions, and certain select products from economies taking steps to strengthen forced labor import restrictions.

- **Section 301: Manufacturing Overcapacity.** On March 11, USTR [initiated](#) Section 301 investigations into whether the manufacturing policies of 16 major trading partners contribute to structural excess capacity and production that unfairly burdens U.S. commerce. The investigations will examine practices in China, the EU, Singapore, Switzerland, Norway, Indonesia, Malaysia, Cambodia, Thailand, South Korea, Vietnam, Taiwan, Bangladesh, Mexico, Japan, and India to determine whether they are unreasonable or discriminatory under the Trade Act of 1974. The action could ultimately provide the administration with a basis to impose tariffs or other trade restrictions and marks a significant expansion of its effort to rebuild U.S. trade leverage through country- and sector-specific Section 301 authorities.
- **USMCA.** The Trump administration formally [announced](#) that it will not extend the U.S.-Mexico-Canada Agreement (USMCA) on trade, starting a decade-long clock to wind down the 32-year-old North American free trade zone as the three countries haggle over proposed changes. That declaration will also kick off a six-year review session, part of a "sunset clause" negotiated by President Trump's first administration. However, it will do little to alter contentious negotiations over the pact's future, including sweeping demands to boost U.S. and regional content in North American automotive production and trade protections to block Chinese goods from benefiting from USMCA. Failure to reach agreement on revisions to USMCA would keep the trade pact in an indefinite limbo, with similar review sessions annually for the next 10 years, after which the North American trade pact would expire on July 1, 2036.
- **Canada.** President Donald Trump recently [invoked](#) Section 338 of the Tariff Act of 1930 to impose an additional 50 percent tariff on nearly \$20 billion in Canadian imports, citing what the administration described as discriminatory trade restrictions affecting U.S. automobiles, alcoholic beverages, and dairy products. USTR said the action responds to Canadian policies that restrict sales of U.S. alcohol, provide preferential dairy market access to the EU, and limit certain U.S. vehicle exports. The tariffs are scheduled to take effect Aug. 19 and are intended to offset the impact of those measures while broader bilateral trade negotiations continue.
- **US-EU Digital Spat.** Trade tensions between the U.S. and EU escalated after the European Commission imposed more than \$1 billion in fines and additional regulatory measures against Google under their Digital Markets Act. USTR Jamieson Greer warned that the actions unfairly target U.S. technology companies and could undermine the recently negotiated Turnberry Agreement, which capped U.S. tariffs on most EU exports at 15 percent. President Trump subsequently announced plans for a trade investigation into the EU's

treatment of U.S. companies and threatened “substantial” new tariffs, arguing that the bloc’s policies discriminate against U.S. businesses. The dispute adds new uncertainty to the Turnberry Agreement and broader transatlantic negotiations over digital trade and market access

- **China.** On June 2, USTR opened a public comment process on the possible creation of a government-to-government U.S.-China Board of Trade designed to manage the bilateral commercial relationship on an ongoing basis. The agency is also seeking recommendations on non-sensitive products that could be considered for tariff modifications as part of an effort to improve balance and reciprocity in trade between the two countries. Initial comments are due July 10, followed by rebuttal comments on July 27.
- **Vietnam.** On May 29, USTR initiated a Section 301 investigation into Vietnam’s intellectual property (IP) protection and enforcement policies, citing persistent concerns that the government has failed to provide adequate and effective safeguards for U.S. rights holders. The investigation will examine whether Vietnam’s acts, policies, and practices are unreasonable or discriminatory.

Trump 2.0 Tariff Announcements			
Target	Rate	Timeline	Authority
Global: Forced Labor Tariffs	10-12.5%	3/12/2026: USTR initiates 301 investigation into 60 countries relating to failures to take action on forced labor. 4/28/2026: USTR holds two-day public hearing on 301 forced labor investigation. 6/2/2026: USTR determines 60 economies’ failure to block forced-labor imports actionable under Section 301. 7/7/2026: USTR holds three-day hearing on determination. 7/23/2026: 301 determinations published: • 10 percent tariff will apply to imports from Argentina, Bangladesh, Cambodia, Canada, Ecuador, El Salvador, Guatemala, Honduras, India, Indonesia, Jordan, Malaysia, Mexico, Pakistan, Sri Lanka, Trinidad and Tobago, and the United Kingdom.	Section 301

		- Set tariffs of 10% or 12.5%, adjusted for existing MFN rates, on select products from EU, Taiwan, Japan, South Korea and Switzerland. - Other investigated economies will generally face 12.5%. - Exempted certain scarce raw materials, economically sensitive goods, and products from economies, strengthening forced-labor import restrictions.	
Structural Excess Capacity and Production in Manufacturing Sectors	TBA	3/11/2026: USTR announces investigation into structural excess capacity and production in manufacturing sectors in China, EU, Singapore, Switzerland, Norway, Indonesia, Malaysia, Cambodia, Thailand, Korea, Vietnam, Taiwan, Bangladesh, Mexico, Japan, and India. 5/5/2026: USTR holds 3-day hearing.	Section 301(b)
Global: Import Surcharge	10%	2/20/2026: Supreme Court rules 6-3 against use of IEEPA, nullifying reciprocal tariff regime. 2/20/2026: 10% tariff under Section 122 issued via presidential proclamation. 2/21/2026: POTUS stated the tariff rate would rise to 15%, but no orders were issued to that effect. 2/24/2026: 10% tariff rate goes into effect. 7/24/2026: 10% tariff rate expired.	Section 122
Canada	10% energy 10% potash, 50% dairy, motor vehicles, & alcohol	2/1/2025: Canada tariffs announced. 3/4/2025: Canada tariffs start. 3/5/2025: Auto imports exempt to Apr 2. 3/6/2025: USMCA imports (~38%) exempt to Apr 2; non-USMCA potash cut to 10%. 4/2/2025: Exemptions extended indefinitely. 5/11/2025: Announced 50% steel/aluminum, then reversed same day. 7/10/2025: Threatened 35% fentanyl-related tariff starting Aug 1. 8/1/2025: 35% fentanyl-related tariff took effect.	IEEPA; Section 301; Section 338

		10/25/2025: Announced 10% tariff over Ontario political advertisement. Mechanism unclear. 1/31/2026: Additional 50% tariff threatened, as well as additional tariffs on aircrafts, if Canada pursues deal with China. 2/20/2026: 35% fentanyl tariffs nullified via EO 14389. 7/20/2026: Section 338 tariff proclamations issued covering alcohol, motor vehicles, and dairy. 7/24/2026: Implementation of Section 301(forced labor) tariffs, with additional 10% duties on Canada. 8/19/2026: Implementation of additional 50% percent Section 338 tariffs on Canadian alcohol, motor vehicles, and dairy.	
Mexico	10% (forced labor)	2/1/2025: Mexico tariffs announced. 3/4/2025: Mexico tariffs start after 30-day pause. 3/5/2025: Auto imports exempt to Apr 2. 3/6/2025: USMCA imports (~49%) exempt to Apr 2. 4/2/2025: Exemptions extended indefinitely. 7/12/2025: Announced fentanyl-related to 30% by Aug 1. 7/31/2025: 30% fentanyl tariffs delayed 90 days. Mexico will continue to pay 25% tariffs on non-USMCA exempt goods. 12/8/2025: Additional 5% tariff threatened over water dispute; mechanism unclear. 12/12/2025: Water dispute resolved, removing 5% tariff threat. 3/11/2026: USTR opens Section 301 probes covering Mexico. 7/1/2026: USMCA joint review begins and the U.S. declined to renew in current form. 7/24/2026: Section 122 surcharge expires and non-USMCA goods revert to MFN rates absent replacement.	Section 301
China	30% until 11/1/26, then 100%, 12.5% (301)	2/4/2025: 10% tariffs on all Chinese imports start. 2/27/2025: Announced +10% hike effective Mar 4. 3/4/2025: Extra 10% took effect (total 20%).	IEEPA; Section 301

		6/11/2025: Deal keeps 20% “fentanyl” + 10% “reciprocal” (30%); pauses hikes 60 days. 8/11/2025: Pause on raising “reciprocal” to 125% extended 90 days. 10/10/2025: Announced extra 100% tariff from Nov 1 over rare-earth controls. 10/24/2025: Announced 301 investigation into “Phase One” US-China trade deal. 10/30/2025: Fentanyl tariffs lowered to 10%. 11/1/2025: Additional 100% tariff set to begin, delayed one year. 11/7/2025: Rare-earth control tariffs delayed one year. 2/20/2026: Fentanyl tariff nullified via EO 14389. 3/11/2026: Section 301(excess capacity) tariffs threatened. 5/18/2026: Announcement regarding US-China economic agreements to expand market access for American agriculture and businesses. 6/2/2026: USTR announced search for public comment on mechanism to promote reciprocal trade with China. 7/24/2026: Implementation of Section 301 (forced labor) tariffs, with additional 12.5% duties on China.	
European Union	15%	2/26/2025: Announced 25% EU tariffs; authority unspecified. 4/2/2025: Set EU “reciprocal” rate at 20%. 5/23/2025: Announced 50% reciprocal tariff effective Jun 1. 5/25/2025: Pushed start to Jul 9. 7/12/2025: Cut plan to 30% by Aug 1 (down from 50%). 7/27/2025: US-EU deal sets reciprocal rate at 15% (replacing 30%). 8/21/2025: As part of deal, EU auto tariff to 15% (from 27.5%) contingent on EU action; pharma/semis capped at 15%. 9/26/2025: Released updated EU exemption list.	Section 301

		3/11/2026: USTR launched a Sec. 301 probe into EU policies related to structural excess capacity and production in the chemicals, machinery, vehicle, and pharmaceutical sectors. 7/24/2026: Section 301 (forced labor) tariffs implemented: 0% for all products with a Column 1 duty rate $\geq 10\%$ and (10% - Column 1 Duty Rate) for all products with a Column 1 Duty Rate $< 10\%$.	
Brazil	12.5% (301 forced labor) 25% (301)	7/17/2025: USTR launches a Sec. 301 probe into Brazil over digital trade/payment services, preferential tariffs, anti-corruption, IP protection, ethanol access, and illegal deforestation. 7/30/2025: EO 14323 adds +40% “free speech” tariff on Brazil (implementation delayed to Aug 6) and publishes exemptions list. 8/6/2025: 40% Brazil tariff takes effect. 11/20/2025: Certain agricultural goods from the exempted from 40% IEEPA tariff. 2/20/2026: 40% free speech tariff nullified via EO 14389. 7/22/2026: Section 301 (unreasonable policies) tariffs implemented, with additional 25% duties on Brazil. 7/24/2026: Section 301 (forced labor) tariffs implemented, with additional 12.5% duties placed on Brazil.	IEEPA, Section 301
Steel & Aluminum	50%	2/10/2025: Signed proclamations expanding Sec. 232; ended exemptions, added derivatives, raised aluminum to 25% (effective Mar 12). 3/12/2025: Changes took effect — exemptions ended, derivatives expanded, aluminum now 25%. 5/30/2025: Announced steel/aluminum tariffs doubling to 50% from Jun 4 (UK exempt). 6/12/2025: Announced coverage for steel content of 8 appliance lines, effective Jun 23. 6/23/2025: Tariffs applied to steel content in dishwashers, refrigerators, washers, dryers, freezers, stoves, ovens, disposals.	Section 232

		8/19/2025: Added new steel/aluminum derivatives to the 50% tariff annex. 4/2/2026: Proclamation restructures Section 232 effective 4/6, duties apply to full customs value, not metal content. 4/6/2026: New framework takes effect, under-15% metal products exempt, 15% cap on metal intensive industrial/grid equipment through 2027. 6/8/2026: Reduced 15% rate expanded to ag equipment, HVAC, and industrial machinery. 7/20/2026: Presidential proclamation issued to spur domestic aluminum production in exchange for lower 232 rate.	
Lumber/Wood Products	10%, 15%, 30%	3/1/25: Ordered a Sec. 232 probe on timber/lumber; report due Nov. 26, 2025. 9/30/25: Proclaimed 10% lumber tariffs effective Oct. 14, with caps of 10% (UK) and 15% (EU/Japan). 10/14/2025: 10% tariffs on lumber take effect. 1/1/2026: Upholstered furniture to 30%; kitchen cabinets & bathroom vanities to 50%. 1/1/2027: Implementation of 30% tariffs on all countries wooden furniture excluding UK, EU, Japan, South Korea, and Taiwan origin products. 1/1/2027: Implementation of 50% tariffs on all countries wooden kitchen cabinets/vanities excluding UK, EU, Japan, South Korea, and Taiwan origin products.	Section 232
Autos	25% EU/Japan/Korea capped at 15% via deal	2/14/2025: Announced auto tariffs to begin Apr 2. 2/18/2025: Said autos ~25%; semis/pharma 25%+. 3/26/2025: Signed Sec. 232 order: autos 25% on Apr 3; auto parts by May 3; CA/MX U.S.-content exempt. 4/3/2025: 25% tariff on autos took effect. 5/3/2025: 25% tariffs on specified auto parts fully in place. 9/16/2025: US-Japan deal cut Japan auto tariff to 15%.	Section 232

		10/31/2025: CBP Issues duty-offset process for auto parts under Section 232. 3/24/2026: Commerce opens auto-parts inclusion window (4/1-14). 6/29/2026: CBP extends the parts duty-offset to medium/heavy-duty vehicle parts. 7/1/2026: EU-US deal caps EU auto parts at 15%, replacing the 25%. Japan and Korea remain at their 15% deal rates.	
Medium-/ Heavy-Duty Trucks and Busses	25%	4/22/2025: Launched Sec. 232 probe on medium/heavy-duty trucks & parts; report due 1/16/2026. 9/30/2025: Announced 25% tariffs on these trucks (EU capped at 15%), initially set for 10/1. 10/1/2025: Original start date (later delayed). 11/1/2025: Revised start date for the 25% tariffs. 1/16/2026: Deadline for the investigation report. 5/1/2026: EU rate threatened to increase to 25% tariffs with exemptions.	Section 232
Ports & Maritime	100% STS Cranes; 100% Chassis; \$50 China Ship Fee	4/14/2025: USTR announces shipping fees for deliveries on Chinese vessels. 10/14/2025: Fees begin at \$50 per net ton per arriving vessel. 11/9/2025: USTR announces suspension of Chinese shipping fees for one year until 11/10/2026; 100% Sec. 301 duties on STS cranes within USTR scope take effect. 11/9/2025: 100% Sec. 301 duties on certain intermodal chassis and chassis parts of Chinese origin take effect. 11/10/2025: Crane & chassis tariffs delayed one year until 11/10/2026. 1/26/2026: Federal Maritime Commission (FMC) opens probe into international ocean carriers' domination of chassis market. 11/10/2026: Crane & chassis tariffs take effect	Section 301

		Grandfathering: STS cranes are exempt if contracted on or before 4/17/2025 and they enter the U.S. before 4/18/2027.	
Semiconductors	25%	1/27/2025: Announced new tariffs on computer chips/semiconductors and pharmaceuticals. 2/18/2025: Stated semis and pharma tariffs would be 25%+. 4/1/2025: Commerce launched a Sec. 232 investigation. 1/14/2026: Presidential Proclamation adopting actions under the Section 232 investigation of advanced semiconductors, semiconductor manufacturing equipment, and derivative products. 1/15/2026: Limited 25% tariff on certain advanced computing chips and derivative products went into effect.	Section 232
Commercial Aircraft & Aircraft Parts	Not levied	5/1/2025: Section 232 investigation triggered. 7/9/2026: Investigation found that imports of commercial aircraft, jet engines, and associated aircraft and engine parts are entering the U.S. in quantities and under circumstances that threaten to impair U.S. national security. Commerce and USTR directed to negotiate agreements within 180 days. 1/5/2027: Deadline for imposing tariffs if no agreements are reached.	Section 232
Critical Minerals	Not levied	4/23/2025: USTR triggers 232 investigation pursuant to EO 14272. 1/14/2026: Presidential Proclamation issued directing Commerce and USTR to negotiate agreements with trading partners: no tariffs imposed.	Section 232

Pharmaceuticals	100% patented, tiered down to 20%/0% by agreement)	1/27/2025: Tariffs announced Jan. 27. 2/18/2025: Said autos ~25%; semis/pharma 25%+. 4/16/2025: Investigation published in Federal Register on Apr 16. 7/8/2025: Threatened 200% tariff on pharma. 8/6/2025: Pharma up to 250%. 9/26/2025: Announced 100% pharma tariff for Oct. 1; EU/Japan capped at 15%; generics exempt; no proclamation yet. 10/1/2025: Planned start date for 100% pharma tariff was placed on hold amid pending MFN negotiations. 10/22/2025: Reports of a 301 investigation on pharmaceutical pricing practices. 4/2/2026: Proclamation imposes Section 232 tariffs on patented drugs and APIs, 100% default. 7/31/2026: Implementation date. Rates/Carve-outs: • Firms with approved onshoring plans get 20% until 4/2/2030. • Those with MFN pricing deals get 0% through 1/20/2029. • EU/Japan/Korea/Switzerland capped at 15%, UK at 10%. • Generics, biosimilars, and specialty products exempt for now.	Section 232
Medical Devices	TBD	9/2/2025: Sec. 232 investigation initiated on PPE, medical consumables, and medical equipment, including devices. 9/24/2025: Commerce filed Sec. 232 investigation to the Federal Register.	Section 232

		10/17/2025: Comment period closed. 5/30/2026: Report due to president. 8/28/2026: Presidential determination due. 9/12/2026: Deadline to implement action.	
Robotics & Industrial Machinery	TBD	9/2/2025: Sec. 232 investigation initiated on robotics and industrial machinery. 9/24/2025: Commerce filed Sec. 232 investigations to the Federal Register. 10/17/2025: Comment period closed. 8/28/2026: Deadline for presidential determination. 9/12/2026: Deadline to implement action.	Section 232
Copper	50%	2/25/2025: Ordered a Sec. 232 probe on copper. 7/8/2025: Announced 50% copper tariff effective Aug 1. 8/1/2025: Implementation of 10% tariffs on Annex I-A copper articles within US, and 50% for all other products. 8/1/2025: Implementation of 10% on Annex I-B copper articles within US, and 25% on all other products. 11/22/2025: Sec. 232 report due. 4/6/2026: Tariff applies to the full value of the good, excluding exemptions.	Section 232
Softwood Timber, Lumber, Upholstered Wooden Furniture & Kitchen Cabinets and Vanities	25%	3/1/2025: Ordered a Sec. 232 probe on timber/lumber; report due Nov 26, 2025. 9/30/2025: Proclaimed 10% lumber tariffs effective Oct 14; caps of 10% (UK) and 15% (EU/Japan). 10/14/2025: 10% lumber tariffs took effect. 12/31/2025: Tariff rates paused until Jan 1, 2027. Tariffs on these products are capped at 10% for UK, 15% for EU and Japan.	Section 232
Agricultural Products	TBD	3/3/2025: Announced tariffs on “external” agricultural products to begin Apr 2.	Unknown

Venezuelan Oil (Secondary)	25%: authorized but never imposed	3/24/2025: EO 14245 imposes an extra 25% tariff on Venezuela — and on countries buying Venezuelan oil/gas — set to take effect as early as Apr 2. 4/2/2025: Earliest possible effective date for the additional 25% tariff. 2/20/2026: Tariff nullified via EO 14389.	IEEPA
Critical Minerals & Derivative Products	TBD	4/15/2025: EO 14272 directing Sec. 232 investigation signed. 1/14/2026: Initial action taken on critical mineral negotiations, no tariffs imposed. 2/4/2026: US – Mexico action plan on critical minerals announced. 2/4/2026: Cooperation with EU and Japan announced. 2/26/2026: Discussion of design for plurilateral agreement on critical mineral trade to strength its resilience in supply chains. 3/19/2026: Announcement of US – Japan action plan on critical minerals. 4/24/2026: Announcement of US – EU action plan for critical minerals supply chain resilience.	Section 232
Polysilicon	TBD	7/16/2025: Sec. 232 investigation into imports of polysilicon and its derivatives filed to Federal Register. 8/6/2025: Comment period closed. 6/26/2026: Deadline for presidential determination. 7/11/2026: Deadline to implement action.	Section 232
Wind Turbines	TBD	8/21/2025: Sec. 232 investigation into wind turbines and their parts and components filed to the Federal Register. 9/9/2025: Comment period closed. 8/8/2026: Deadline for presidential determination. 8/23/2026: Deadline to implement action.	Section 232
UAS & Components	TBD	7/16/2025: Sec. 232 investigation into imports of UAS and its components filed to Federal Register. 8/6/2025: Comment period closed. 6/26/2026: Deadline for presidential determination.	Section 232

		7/11/2026: Deadline to implement action.	
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