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International Trade & Supply Chain Law: 2025 Year in Review & Outlook for 2026

Husch Blackwell's seventh-annual international trade and supply chain law year-in-review report provides a summary review of the major developments in trade policy and the trends that impacted global supply chains while casting an eye toward what promises to be a very busy year in 2026.

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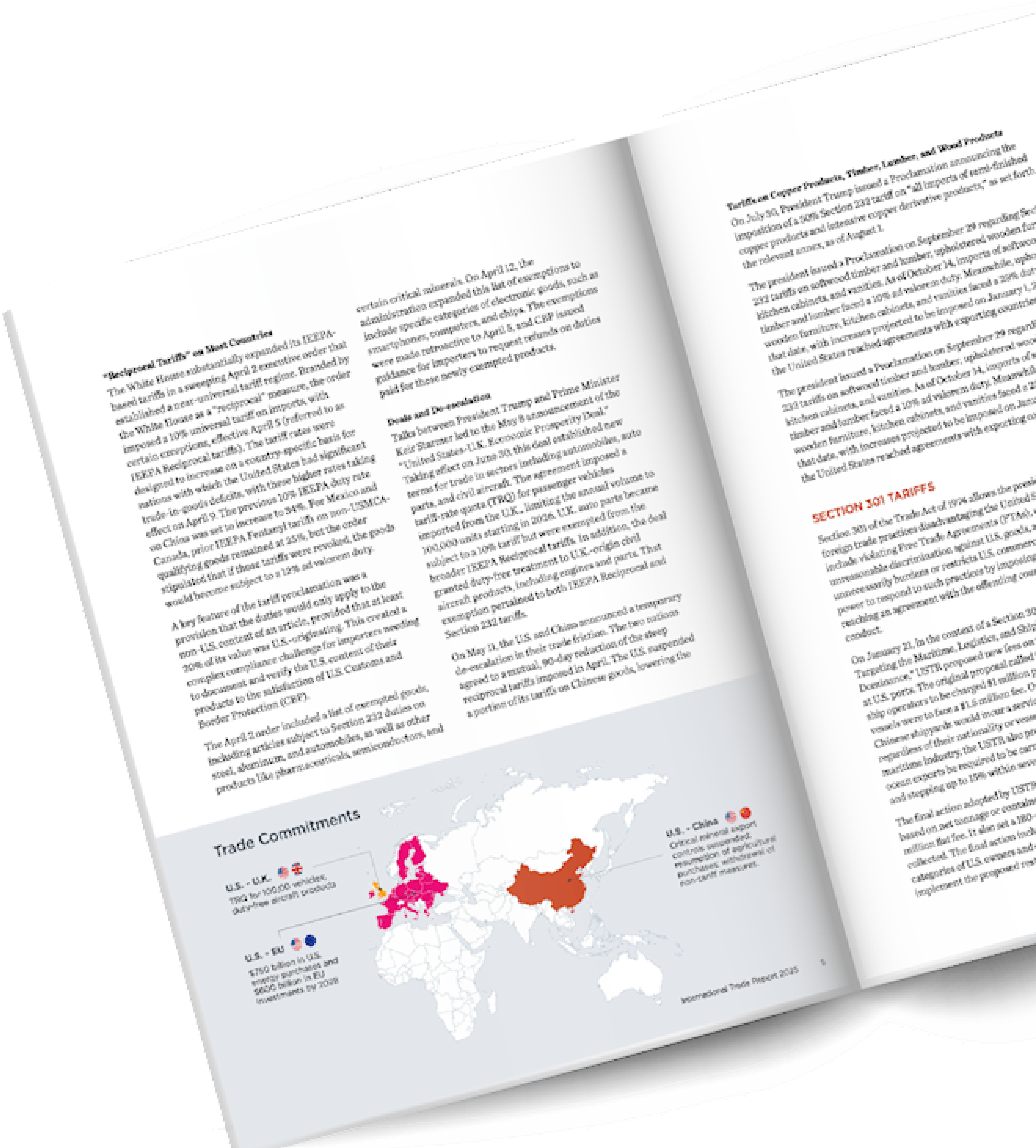

"Reciprocal Tariffs" on Most Countries

The White House substantially expanded its IEEPA-based tariffs in a sweeping April 2 executive order that established a near-universal tariff regime. Branded by the White House as a "reciprocal" measure, the order imposed a 10% universal tariff on imports, with certain exemptions, effective April 5 (referred to as IEEPA Reciprocal tariffs). The tariff rates were designed to increase on a country-specific basis for nations with which the United States had significant trade-in-goods deficits, with these higher rates taking effect on April 9. The previous 10% IEEPA duty rate on China was set to increase to 34%. For Mexico and Canada, prior IEEPA Fentanyl tariffs on non-USMCA-qualifying goods remained at 25%, but the order stipulated that if those tariffs were revoked, the goods would become subject to a 12% ad valorem duty.

A key feature of the tariff proclamation was a provision that the duties would only apply to the non-U.S. content of an article, provided that at least 20% of its value was U.S.-originating. This created a complex compliance challenge for importers needing to document and verify the U.S. content of their products to the satisfaction of U.S. Customs and Border Protection (CBP).

The April 2 order included a list of exempted goods, including articles subject to Section 232 duties on steel, aluminum, and automobiles, as well as other products like pharmaceuticals, semiconductors, and certain critical minerals. On April 12, the administration expanded this list of exemptions to include specific categories of electronic goods, such as smartphones, computers, and chips. The exemptions were made retroactive to April 5, and CBP issued guidance for importers to request refunds on duties paid for these newly exempted products.

Deals and De-escalation

Talks between President Trump and Prime Minister Keir Starmer led to the May 8 announcement of the "United States-U.K. Economic Prosperity Deal." Taking effect on June 30, this deal established new terms for trade in sectors including automobiles, auto parts, and civil aircraft. The agreement imposed a tariff-rate quota (TRQ) for passenger vehicles imported from the U.K., limiting the annual volume to 100,000 units starting in 2026. U.K. auto parts became subject to a 10% tariff but were exempted from the broader IEEPA Reciprocal tariffs. In addition, the deal granted duty-free treatment to U.K.-origin civil aircraft products, including engines and parts. That exemption pertained to both IEEPA Reciprocal and Section 232 tariffs.

On May 11, the U.S. and China announced a temporary de-escalation in their trade friction. The two nations agreed to a mutual, 90-day reduction of the steep reciprocal tariffs imposed in April. The U.S. suspended a portion of its tariffs on Chinese goods, lowering the

Our downloadable report, “International Trade & Supply Chain Law: 2025 Year in Review & Outlook for 2026,” focuses on these key areas:

Tariffs

Trade Remedies

Customs and Import Enforcement

Export Controls and Trade Sanctions

Transportation and Supply Chain

What to Expect in 2026

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