

Alert | International Trade



March 2025

EU to Impose Tariffs on US Goods – Steel, Aluminum, and More – in April 2025

Go-To Guide

- The EU will impose new tariffs on U.S. goods starting April 1 and April 13, 2025, in response to U.S. tariffs on EU steel and aluminum.
- Affected U.S. goods will face 25% customs duties, impacting industries like steel, aluminum, textiles, and more.
- The EU's countermeasures may affect U.S. exports worth up to EUR 26 billion.
- Importers of U.S. goods into the EU should explore duty mitigation and supply chain strategies to manage increased costs.
- The EU remains open to negotiations with the United States to resolve the tariff dispute.

Key Aspects of the Measures

On March 12, 2025, the European Commission announced additional tariffs on U.S. goods. These measures respond to U.S. tariffs on EU steel and aluminum imports. The Commission believes that the measures are strong, but proportionate. The counter measures involve a two-step approach:

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- First, the Commission decided that the 2018 and 2020 countermeasure suspensions against the United States will expire April 1. These tariffs, which impact a broad range of U.S. goods, may be tied to the economic damage caused to EUR 8 billion worth of EU steel and aluminum exports to the United States. Examples of affected products include motorcycles, bourbon, and boats.
- Second, in response to new U.S. tariffs affecting more than EUR 18 billion worth of EU exports, the
 Commission has proposed a package of new countermeasures on U.S. exports. These measures will
 take effect by April 13. On March 12, the Commission consulted EU member states and stakeholders
 about a preliminary list, after which the EU will pick certain product categories and decide on the final
 list of targeted goods. The proposed targeted products include steel and aluminum, textiles, home
 appliances, plastics, poultry, beef, eggs, dairy, sugar, and vegetables.

Considerations for Companies Importing U.S. Goods to the EU

There are numerous duty mitigation and supply chain strategies EU importers may consider to reduce the impact of the increased duty burden.

Duty mitigation strategies, for example, focus on the imported products' origin and whether products qualify as U.S. origin if they were produced or assembled outside the United States. A (limited) revision of the production and supply chain may result in savings on EU imports. However, relocating U.S. production to another country solely to avoid additional EU duties may be perceived as manipulation and disregarded.¹

Another approach involves reviewing the customs valuation of imported goods. It may be possible to calculate the customs value differently or make legal deductions from the transaction value used for customs. Additionally, when importing U.S. goods subject to the 25% EU tariffs for distribution within both EU and non-EU markets, importers may consider storing these goods in a customs warehouse rather than clearing them through EU customs immediately.

Conclusion

While the EU tariffs pose challenges, a proactive approach may help mitigate the EU customs duty burden and enhance overall compliance with EU trade and customs legislation. Staying informed and prepared is crucial for regular importers, as the tariff landscape could change if the United States and the EU initiate talks. Understanding the global trade landscape and implementing strategic measures may help organizations better mitigate the overall duty burden and safeguard their interests in an increasingly complex environment.

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¹ Judgment, European Court of Justice, 21 November 2024, case C-297/23 P.



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