



## **Tariff Changes Effective November 1st**

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**AUTO PART TARIFF IMPACT,  
MHDV PARTS TARIFF AND CHINA  
CHANGES**

An aerial photograph of a port and city, likely in Japan, featuring a large bridge, industrial cranes, and dense urban development. The image is overlaid with a semi-transparent blue filter.

SECTION 1:

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# Auto Part Changes and New MHDV Parts

# 1.1 AUTO PARTS HISTORY

Announced in March 2025, the auto parts tariff went into effect on May 3, 2025

- Initially, guidance from CBP declared that, for the purposes of the non-stacking order, an auto part that was qualified for USMCA was not considered "subject to" the auto parts tariff
  - This meant that if a product was on the auto parts list but qualified for USMCA it would be subject to the steel/aluminum tariffs (if it was on either list).

## 1.2 CHANGES TO STACKING

Announced on October 22nd, with further guidance received from CBP on October 29th, and effective November 1, 2025, the U.S. government now recognizes auto parts (and MHDV parts) that are qualified for USMCA as "subject to" the auto parts/MHDV parts tariff.

[Source.](#)

- This means that auto parts qualified for USMCA now supersede Section 232 for steel/aluminum.
- No change for countries outside of North America; Section 232 for auto parts still supersedes the reciprocal tariffs **and** steel/aluminum.
- For China, IEEPA for Fentanyl and the older Section 301 from 2018 still stack with the auto parts and MHDV parts tariff.



## 1.3 CHANGES TO STACKING - EXAMPLE

- A product is produced in Canada and is on the existing auto parts list, classified under 8708.29.5160. It is qualified for USMCA and on the aluminum Section 232 list.
- The product is valued at \$2000 USD and is 100% aluminum.
- Prior to November 1st, claiming USMCA eliminated the auto parts tariff and the IEEPA tariff, but did not eliminate the steel/aluminum tariff.
- Importer previously would pay up to 50% of \$2000, or \$1000 in duty, as the product is 100% aluminum.
- After November 1, goods qualified for USMCA are now considered "subject to" the auto parts tariff. As a result, Importer pays total of **\$0 duty** on a Canadian or Mexican origin auto part that is on the auto part list **and** qualified for USMCA.\*
- \*See slide 1.8 for a disclaimer regarding self-certified parts qualified for USMCA.

# 1.4 MEDIUM AND HEAVY-DUTY VEHICLE PARTS (MHDVP)

Effective November 1, 2025, there is a new US import tariff in place on Medium and Heavy-Duty Vehicles, MHDV for short, and parts thereof. [Source.](#)

- The stacking relationship is the same for MHDVs and MHDV parts as it is for automobiles and auto parts.
- The self-certification requirements for MHDV parts is the same as auto parts, with self-certified MHDV parts being declared under 9903.74.09.

Same gray area concerning self-certified MHDV parts remains.

# 1.5 SELF-CERTIFICATION AND AUTO OR MHDV PART

Effective November 1, 2025, the U.S. government allows importers to self-certify that their products **should** be subject to the auto parts or MHDV parts tariff, if it meets certain criteria.

- "(12) An importer of record may declare an automobile part or MHDVP as subject to the automobile parts tariff pursuant to Proclamation 10908, as amended, or to the MHDVP tariff pursuant to this proclamation. For an automobile or MHDV part to be eligible for this treatment, the part must meet the following conditions:
  - (a) the part cannot be presently subject to the tariffs imposed pursuant to Proclamation 10908, as amended, or this proclamation;
  - (b) the part cannot be classifiable in Chapters 72, 73, or 76 of the HTSUS; and
  - (c) the part **must** be used for automobile- or MHDV-related production or repair activity in the United States, as attested to by certification from the importer of record."

**Important Note:** The U.S. government has not provided guidance for whether the USMCA exemption for auto parts can be claimed on self-certified auto or MHDV parts meeting the criteria of section 12 of the executive order.

- Self-certified auto parts are declared under a new chapter 99 #, 9903.94.07, while the USMCA exemption code is 9903.94.06. CBP has not provided guidance for if 9903.94.06 can be applied to products that are self-certified as subject to the auto parts tariff and how that would be reported on entries.
- Buckland has reached out to CBP's Trade Remedy department and asked in various trade-related committees, lawyers, etc. No clear answer has been presented.

## 1.6 SELF-CERTIFIED PARTS THAT ARE USMCA QUALIFIED

**Important Note:** The U.S. government has not provided definitive guidance for whether the USMCA exemption for auto parts can be claimed on self-certified auto parts meeting the criteria of section 12 of the executive order.

- Self-certified auto parts are declared under a new chapter 99 #, 9903.94.07, while the USMCA exemption code is 9903.94.06. CBP has not provided guidance for if 9903.94.06 can be applied to products that are self-certified as subject to the auto parts tariff and how that would be reported on entries.
- In chapter 99, 9903.94.07 is referenced in subdivision (f), subdivision (h) and subdivision (p).
  - Subdivision (f) states 9903.94.05 and 9903.94.07 apply to all entries of automobile parts listed in subdivision (g) or meeting the requirements of subdivision (p).
  - Subdivision (h), covering 9903.94.06, refers to USMCA exemption and references subdivision (p).
  - Subdivision (p), covering 9903.94.07, references subdivision (h) in turn and states "except as provided for in subdivision (h)" no FTAs will apply.
- Buckland has reached out to CBP's Trade Remedy department and asked in various trade-related committees, lawyers, etc. No clear answer has been presented.
- Buckland recommends importers demonstrate reasonable care and due diligence by engaging/seeking legal counsel before determining whether to claim USMCA on self-certified auto parts and/or MHDV parts.



## 1.7 SELF-CERTIFICATION - EXAMPLE 1

- An auto part from country of origin Indonesia is classified under HTSUS 8708.99.8180. It is **not** currently on the auto parts list. The importer certifies it meets the criteria to be considered an auto part.
- The auto part is valued at \$1000 USD.
- The auto part contains 30% steel content. Importer currently pays 50% Section 232 duty on the value of the 30% steel content (effectively 15% of the value) + 19% reciprocal tariff on the 70% non-steel content.
- Starting November 1, 2025, the importer chooses to self-certify this product as an auto part and it is declared under 9903.94.07. The importer will pay 25% Section 232 for auto parts and 0% Section 232 for steel **or** reciprocal.
- The formula if the importer did **not** self-certify would look similar to this:  
 $(\$300 \times 50\%) + (\$700 \times 19\%) = \$283$  in combined steel+reciprocal duty.
- If the importer **did** self-certify it would be  $\$1000 \times 25\% = \$250$  in auto parts duty.
- In this scenario, the importer may wish to self-certify, as paying \$250 is less than paying the \$283.

## 1.8 SELF-CERTIFICATION – EXAMPLE 2

- An auto part from country of origin Thailand is classified under HTSUS 8708.99.8180. It is **not** currently on the automotive parts list. The importer certifies it meets the criteria to be considered an automotive part.
- The value of the product is \$1000 USD.
- Said auto part contains 8% steel content. Importer currently pays 50% Section 232 duty on the value of the 8% steel content + 19% reciprocal tariff on the non-steel content.
- Starting November 1, 2025, the importer chooses to self-certify this product as an auto part and it is declared under 9903.94.07. The importer will pay 25% Section 232 for auto parts and 0% Section 232 for steel **or** reciprocal.
- The formula if the importer did **not** self-certify would look similar to this:  $(\$80 \times 50\%) + (\$920 \times 19\%) = \underline{\$214.80}$  in combined steel+reciprocal duty.
- If the importer **did** self-certify it would be  $\$1000 \times 25\% = \underline{\$250}$  in auto parts duty.
- Importers of goods subject to Section 232 steel/aluminum and reciprocal tariffs may wish to compare the combined duty rate to the 25% Section 232 for auto parts tariff to determine, if their good meets the criteria, if they would prefer to self-certify.

## 1.9 SELF-CERTIFICATION – EXAMPLE 3

- An auto part from country of origin Mexico is classified under HTSUS 8708.99.8180. It is **not** currently on the automotive parts list and is **not** qualified for USMCA. The importer certifies it meets the criteria to be considered an automotive part.
- The value of the product is \$1000 USD.
- Said auto part contains 40% steel content. Importer currently pays 50% Section 232 duty on the value of the 40% steel content, but **no** IEEPA tariffs against Mexico due to the non-stacking.
- The importer chooses to self-certify this product as an auto part and it is declared under 9903.94.07. The importer will pay 25% Section 232 for auto parts and 0% Section 232 for steel or IEEPA.
- The formula if the importer did **not** self-certify would look similar to this:  $\$400 \times 50\% = \$200$  in steel duty.
- If the importer **did** self-certify it would be  $\$1000 \times 25\% = \underline{\$250}$  in auto parts duty.
- Each scenario is different, so importers should analyze their specific scenarios to determine which makes more sense.



An aerial photograph of a port and city, likely in Japan, showing a large harbor with many cranes, a complex highway interchange, and dense urban development. The image is overlaid with a semi-transparent blue filter.

SECTION 2:

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# China Tariff Changes

## 2.1 CHINA TARIFF CHANGES

- Effective November 10, 2025, the United States Government is [lowering the IEEPA for Fentanyl tariffs](#) on China from 20% to 10%.
- Effective November 10, 2025, the United States Government is [maintaining the pause on the China-specific reciprocal tariff](#) until November 2026. China's reciprocal rate will thus remain at 10%, matching the global reciprocal tariff.
- No other changes to the stacking order, requirements, etc. have been implemented that affect China.



An aerial photograph of a coastal city, likely Yokohama, Japan. The image shows a large port area with numerous orange gantry cranes and shipping containers along the waterfront. A complex system of elevated highways and bridges curves through the city, with several vehicles visible on the roads. The city is densely packed with various buildings, including large industrial or commercial structures and smaller residential blocks. The water of the harbor is visible on the left side of the frame.

## SECTION 3:

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# Questions?