

## Note to Members Regarding Tariff Actions by the Trump Administration

We understand that many members have questions about tariffs being imposed by the Trump administration will apply to their operations. NSSF is monitoring the current situation regarding the increase in tariffs being imposed by the United States on imported commodities and raw materials, e.g., copper, steel, aluminum, and on firearm, ammunition, optics, and related products for the hunting, shooting and personal protection market. NSSF is also monitoring countervailing tariffs being imposed or threatened by other countries. NSSF is concerned that the growing “trade war” will result in increased manufacturing costs, which could adversely impact profitability and economic growth for our industry. We are also concerned that prices will increase at the wholesale and retail level for both imported and domestically manufactured firearms, ammunition and related products, which could lead to a reduced consumer demand and exacerbate an already soft market. Rising tariffs will also constrict the export market for our industry’s products. NSSF has always – and will continue to support free and fair trade and works diligently to promote and encourage both the import and export of our industry’s products. We plan on staying on top of this issue. We will be engaged in a variety of industry-specific research and other activities so that we can provide relevant data to our members and governmental stakeholders as we analyze the short and long-term implications of these tariffs.

### What additional tariffs are being put in place?

President Trump’s Executive Order (EO) titled “[Regulating Imports with a Reciprocal Tariff to Rectify Trade Practices that Contribute to Large and Persistent Annual United States Goods Trade Deficits](#),” establishes a baseline 10% reciprocal tariff on **all imports** to the United States. It also establishes country specific reciprocal rates for imports from countries listed in [Annex I to the EO](#). These rates are generally in addition to any other duties, fees, taxes, exactions, or charges which might already apply to the imported articles.

Further, an [additional EO](#) issued on the same day removed the **de minimis** exemption for tariffs imposed on goods imported from China (including Hong Kong).

### **When do these additional tariffs take effect?**

The baseline 10% tariff took effect at 12:01 am ET on April 5, 2025.

The increased rates for countries listed in Annex I to the EO originally took effect at 12:01 am on April 9, 2025, but have been [suspended](#) for a 90-day period starting at 12:01 am April 10<sup>th</sup>, and are scheduled to go back into effect at 12:01 am on July 9, 2025.

The termination of the *de minimis* exemption for goods imported from China is set to take effect at 12:01 am ET on May 2, 2025.

### **Are any articles exempt from these reciprocal tariffs?**

Yes, the EO sets forth a number of exemptions to the additional tariffs imposed, including the following:

- United States-Mexico-Canada Agreement (USMCA)-compliant imports from Mexico and Canada;
- Imports from Mexico and Canada which are subject to tariff's imposed by President Trump's EO's addressing the cross-border flow of illicit drugs (while those tariffs are in effect);
- Articles which fall within an extensive list of HTS codes specified in [Annex II](#) to the EO (including numerous copper articles);
- Certain Steel and Aluminum articles which are subject to Section 232 tariffs under the Trade Expansion Act of 1962; and
- The U.S. content of imported articles, where the value of the US content in the article meets a specified threshold.

It is important to note that these exceptions, as well as the additional tariff rates themselves, are subject to change at the direction of the President.

### **What should I do to prepare for these new tariffs?**

NSSF members are strongly advised to familiarize themselves with the EO, and engage with their independent legal counsel and trade professionals in order to fully understand the effect that these tariffs might have on their operations. The application of tariffs and any applicable exemptions is a highly fact-intensive exercise and members are advised to seek professional guidance in making determinations.

Additionally, members are advised to actively monitor authoritative sources of information, to ensure they remain abreast of all new tariff actions and updates. Such sources include, but are not limited to:

- [The White House](#) (for announcements of Executive Orders and other Presidential actions);
- [The Federal Register](#) (for official versions of all Executive Orders);
- [The U.S. Department of Commerce](#) (for information regarding past impositions of Section 232 tariffs on imports of aluminum and steel articles); and
- [U.S. Customs and Border Protection](#) (for regulatory guidance on article classifications and answers to frequently asked questions about tariff applications).

The information provided herein is for informational purposes only and is not to be considered legal advice. NSSF advises the reader to consult with their own legal counsel.

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