



AMBA proudly introduces *The Capitol Beat*. Delivered from Inside the Beltway Solutions, this newsletter provides information on the latest happenings in Washington, D.C. that are important to the mold manufacturing industry. *Please forward this email to a colleague who may have interest in these topics.*

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Molds from China Face 45% Tariffs

As of March 4, 2025, virtually all industrial molds imported from China face a 45 percent tariff rate with a handful of specialty molds subject to a 27.5 percent tariff. This is an important victory for AMBA, which continues to lobby the Trump administration for tariff rates that to help offset the 40-60 percent price advantage China has over U.S. mold manufacturers.

Since taking office, President Trump imposed an additional 20 percent tariff on all imports from China under the International Emergency Economic Powers Act (IEEPA). This action is in addition to the existing Section 301 tariffs currently in place. The AMBA successfully lobbied the first Trump administration to reinstate the 25 percent tariff on plastic injection molds that they had previously lifted. Today, the 25 percent rate applies to mold bases, injection or compression molds for metal, glass, rubber and plastics and for molds and blow molds for rubber or plastic. A 7.5 percent rate applies to molds for

mineral materials, whether injection, compression or of another type.

Taken together, the combined Section 301 and IEEPA tariff rate for virtually all industrial molds is now 45 percent, in addition to other duties and fees required upon import. The AMBA is working with the Trump administration and other industrial groups to help level the playing field not only with China but also with other importers of underpriced or subsidized molds, tooling and dies into the U.S.

AMBA Files Comments on Unfair Trade Practices

The AMBA recently submitted comments highlighting the significant challenges faced by the domestic mold building industry due to unfair trade practices. On March 11, 2025, AMBA filed comments with the Office of the United States Trade Representative (USTR) on “Reviewing and Identifying Unfair Trade Practices and Initiating All Necessary Actions to Investigate Harm From Non-Reciprocal Trade Arrangements.”

The USTR is currently conducting a review of unfair and non-reciprocal trade policies and practices from other nations to recommend remedies to such practices to the President. This initiative is in response to directives outlined in President Trump’s “America First Trade Policy” memorandum and the “Reciprocal Trade and Tariffs” memorandum. In its call for comments from stakeholders to aid the review, USTR requested detailed information on a country-by-country basis to help in identifying any unfair trade practices by other countries and to initiate all necessary actions to investigate the harm to the United States resulting from any non-reciprocal trade arrangements.

In its comments, AMBA highlighted how the Section 301 tariffs have positively impacted the industry, reducing Chinese injection mold imports by 45% from 2017 to 2024. However, AMBA noted that Chinese exporters have adopted various strategies to circumvent these tariffs, including transshipment through third countries, intentional misclassification, undervaluation of goods and separating design and construction costs to reduce the value subject to tariffs.

Moreover, the AMBA raised concerns about the activities of Canadian and Mexican firms that further undermine U.S. trade policy. “In addition to the evasion schemes employed by Chinese exporters, a concerning trend has emerged involving Canadian firms. These companies are purchasing tool steel from China, manufacturing components in Canada, and then exporting the finished products to the United States,” the comments state. “Furthermore, similar practices have been observed with Mexican firms. Chinese exporters ship their products to Mexico, where they undergo minimal processing or are simply relabeled before being sent to the United States.”

The USTR review is set to be delivered to the President by April 1. Following this, USTR, the Commerce Department, and other relevant agencies will initiate all necessary actions, pursuant to their respective legal authorities, to investigate the harm to the United States from any non-reciprocal trade arrangements implemented by trading partners. Subsequently, these agencies will submit a comprehensive report to the President outlining any proposed remedies.

Tariffs on Steel, Aluminum and Derivatives In Effect; Countries Respond

On Wednesday, March 12, 2025, at 12:01 AM, the 25 percent tariffs on steel and aluminum were globally implemented on all imports without any country exemptions. This action signifies not only the reinstatement of the complete Section 232 steel and aluminum tariffs but also an increase in the tariff rate from 10 percent to 25 percent on all aluminum. The White House did not grant any country exemptions from the tariffs as of this writing, nor indicated that the Commerce Department would reopen the previously closed exclusion process that allowed U.S. importers to request temporary relief from paying the import tariff.

The tariff action under the Section 232 national security law also imposes a 25 percent tariff on 167 derivatives of steel and 123 aluminum derivatives. Companies can view the list of derivatives for aluminum [here](#) and for steel [here](#).

Countries have already begun to respond to the tariff actions on steel and aluminum products. On March 12, as the U.S. Section 232 tariffs took effect, Canada announced retaliatory trade duties on approximately \$21 billion worth of U.S. goods, including a 25 percent reciprocal tariff on certain steel and aluminum products.

The European Union (EU) will be retaliating but is postponing the tariffs levied on the U.S. previously set to take effect on April 1. On March 20, 2025, EU Trade Commissioner Maroš Šefčovič announced that the EU would postpone imposing tariffs on €26 billion of U.S. exports in response. Initially, the EU had planned a two-step response, lifting the suspension of tariffs on the €26 billion of U.S. exports originally imposed in 2018 and 2020 due to the 2018 Section 232 tariff action, and developing new retaliatory measures in mid-April. This first step has been delayed and will be merged with the second step.

Additionally, the EU is moving to join Canada's World Trade Organization (WTO) case challenging the Section 232 steel and aluminum tariffs, which argues that the duties violate Article II of the General Agreement on Tariffs and Trade, which requires that WTO members "accord to the commerce of the other contracting parties treatment no less favourable than that provided for" in the members' schedules of concessions adopted upon accession to the organization, among other provisions.

On March 13, 2025, Canada submitted a formal request for consultation to the WTO's Dispute Settlement Body, marking the initial step in a WTO dispute. On March 20, the EU formally requested to join the consultation, stating that the EU "has a substantial trade interest" in the consultations as the tariffs "at issue also concern imports from the EU," impacting a total of €26 billion or approximately 5 percent of total EU goods exported to the U.S.

U.S. Small Businesses Exempt from Corporate Transparency Reporting

Effective immediately, U.S. small businesses are no longer required to file beneficial ownership information (BOI) under the Corporate Transparency Act (CTA). On March 21, 2025, the Financial Crimes Enforcement Network (FinCEN) and Treasury Department announced that U.S. companies and U.S. persons are not required to file beneficial ownership information reports (BOIRs) under the CTA.

In an interim final rule, set to be published in the Federal Register, FinCEN revises the regulatory definition of “reporting company” to mean only those entities formed under the law of a foreign country and registered to do business in any U.S. State or Tribal jurisdiction. The FinCEN notice states, “Thus, through this interim final rule, all entities created in the United States — including those previously known as ‘domestic reporting companies’ — and their beneficial owners will be exempt from the requirement to report BOI to FinCEN.”

Enacted by Congress in 2020, the CTA mandates that companies earning \$5 million or less in revenue and employing twenty or fewer individuals must file beneficial ownership reports, which include contact information of owners along with copies of their IDs with the Financial Crimes Enforcement Network (FinCEN) of the Department of the Treasury.

EPA Commences Deregulation Initiatives

On March 12, 2025, the U.S. Environmental Protection Agency (EPA) announced its intention to review or rescind over 30 environmental regulations. This significant deregulation effort, described by Administrator Lee Zeldin as “the greatest and most consequential day of deregulation in U.S. history,” aims to reduce compliance costs, promote energy and industrial growth and grant more authority to states.

The EPA highlighted several key regulations under consideration, including:

- Revisiting the Biden-era rule on limiting CO₂ emissions from power plants
- Reassessing the National Ambient Quality Standards (NAAQs) for fine particulate matter (PM_{2.5})
- Reevaluating emission standards for cars and trucks
- Overhauling the social cost of carbon (SCC) metric used in EPA decision-making
- Terminating the Biden-era Good Neighbor Plan for ozone, which imposed federal limits on smog-forming emissions across state boundaries
- Reconsidering the Mandatory Greenhouse Gas (GHG) Reporting Program
- Revising the definition of “Waters of the U.S.” (WOTUS) following the Supreme Court’s Sackett decision, which narrowed the interpretation of navigable waters under the Clean Water Act (CWA)

Notably, the EPA will also reevaluate the 2009 Greenhouse Gas Endangerment Finding, which determined that greenhouse gases (GHGs) pose risks to public health and the environment. The Clean Air Act (CAA) mandates that the EPA regulate air pollutants if they are found to “cause, or contribute to, air pollution which may reasonably be

anticipated to endanger public health or welfare.” This finding provides the EPA with the legal authority to regulate GHGs and has served as the basis for numerous GHG regulations.

Commerce Investigating Copper Imports

The U.S. Department of Commerce has launched a new national security investigation into copper imports. Following the direction outlined in an executive order (EO) by President Trump, Commerce formally initiated the investigation under Section 232 of the Trade Expansion Act of 1962 on March 10, 2025.

The investigation is looking to assess various forms of copper imports, including raw mined copper, copper concentrates, refined copper, copper alloys, scrap copper and derivative products. The broad scope of the investigation means that imports of brass and nickel could be included under the definition of “copper alloys”.

As outlined in Section 232, the Commerce will evaluate such factors as:

- Current and projected U.S. copper demand for defense, energy and critical infrastructure
- Ability of domestic production to meet demand
- Impact of foreign competition on U.S. copper producers
- Other factors affecting national security

By November 22, 2025, the Secretary of Commerce will submit a report to the president with findings and recommendations on actions to mitigate any threats, including potential tariffs, export controls or incentives to increase domestic production.

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