

# CUSTOMER ADVISORY

Compliance Update  
25 SEPTEMBER 2025



- **U.S. Customs Issues CSMS #66333270 Providing Guidance on Implementation of U.S.–E.U. Framework Agreement**

Based on the authorization of Executive Order [\(EO\) 14346](#), the Department of Commerce (DOC), Department of Homeland Security (DHS), and the Office of the United States Trade Representative (USTR) published a Federal Register Notice (FRN) to modify the Harmonized Tariff Schedule of the United States (HTSUS), as determined to be necessary and appropriate to effectuate the EO and the [Framework on an Agreement on Reciprocal, Fair, and Balanced Trade](#) (the U.S.–European Union (E.U.) Framework Agreement) that was announced by the United States and the European Union (E.U.) on August 21, 2025. On September 24, 2025, DOC posted “Implementing Certain Tariff-Related Elements of the U.S.–E.U. Framework on an Agreement on Reciprocal, Fair, and Balanced Trade” ([2025-18660.pdf](#)), with the relevant HTSUS modifications available for public inspection in the Federal Register. U.S. Customs and Border Protection (CBP)’s updated guidance [here](#) in Annex 1 is based on the modifications scheduled for September 25, 2025. The FRN includes modifications to the International Emergency Economic Powers Act (IEEPA) and Section 232 of the Trade Expansion Act of 1962 tariffs applicable to imported articles that are products of E.U. member countries (Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia (Czech Republic), Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, and Sweden). The FRN amends the HTSUS to adjust tariffs on certain articles that are products of E.U. member countries, including automobiles and automobile parts,



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unavailable natural resources (including cork), aircraft and aircraft parts, and generic pharmaceuticals and their ingredients and chemical precursors.

- [U.S. Food and Drug Administration \(FDA\) Supplemental Guide, Version 2.5.13 posted on CBP.gov](#)
- [Automated Commercial Environment \(ACE\) Portal Updates to enable electronic refund enrollment set to deploy September 30th, 2025](#)
- [Court of Appeals for the Federal Circuit \(CAFC\) agrees with USTR authority under Section 307\(a\)\(1\)\(B\) to impose escalatory List 3 and List 4A tariff actions under Section 301](#)

**STAY AHEAD – ONE FORWARDER, ONE BROKER, OVERALL COMPLIANCE**

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