

# USTR Proposes Multiple New Tariff Actions and Other Trade-Related Measures

June 5, 2026

The Office of the U.S. Trade Representative (USTR) has recently announced several significant new tariff actions and trade investigations pursuant to Section 301 of the Tariff Act of 1974 and a new Section 301 investigation of Vietnam related to intellectual property protection and enforcement. USTR also recently announced the development of a new government-to-government mechanism to manage trade between the United States and China. These actions impact almost all goods imported into the United States and from nearly all U.S. trading partners. For each action, USTR announced a public comment process, providing companies with an important opportunity to raise trade-related concerns with the Administration.

## *Section 301 Investigation on Forced Labor*

On June 2, 2026, USTR announced its determinations in the Section 301 investigations concerning the failure by 60 countries to impose and effectively enforce prohibitions on the importation of goods produced with forced labor. USTR found that six economies – Canada, Ecuador, the European Union, Indonesia, Mexico, and Pakistan – have failed to effectively enforce a prohibition on the importation of goods produced with forced labor. The remaining 54 countries under investigation were found to have failed to impose and effectively enforce a prohibition on the importation of goods produced with forced labor. Based on these findings, USTR has proposed a 10% duty on imports from Canada, the European Union, Indonesia, Mexico, Pakistan, Argentina, Bangladesh, Cambodia, Ecuador, El Salvador, Guatemala, Indonesia, Malaysia, Taiwan, and the United Kingdom and a 12.5% duty on all other investigated countries.

## Authors

Timothy C. Brightbill  
Partner  
202.719.3138  
tbrightbill@wiley.law

Maureen E. Thorson  
Partner  
202.719.7272  
mthorson@wiley.law

Stephanie M. Bell  
Partner  
202.719.4384  
sbell@wiley.law

Tessa Capeloto  
Partner  
202.719.7586  
tcapeloto@wiley.law

Kimberly A. Reynolds  
Associate  
202.719.3294  
kreynolds@wiley.law

Rafael A. Andino  
International Trade Practice Attorney  
202.719.3466  
randino@wiley.law

## Practice Areas

Customs Law and Compliance  
International Trade  
Strategic Competition & Supply Chain  
Tariffs & Trade Policy  
Trade Policy and Trade Negotiations  
Trump Administration Resource Center

The proposed actions exclude certain goods, including:

- Items listed in Annex A of the Federal Register notice, including all articles and parts currently subject to Section 232 tariffs;
- Raw materials that if subject to the proposed additional tariffs could lead to the unavailability of domestic supply;
- Products that could cause economy-wide disruptions if subject to the proposed additional tariffs;
- Products that cannot be grown or produced in sufficient quantities in the United States or obtained from other sources; and
- Articles for which additional tariffs may not contribute substantially to the elimination of the investigated acts, policies, and practices.

USTR has requested public comment on its proposed action, including regarding whether certain products or countries should be subject to a different duty rate and whether any products should be added to or removed from the exclusion list in Annex A. Following the comment period, USTR will also hold a public hearing. The schedule for comments and the hearing is as follows: **June 22, 2026**: due date for requests to appear at the hearing, along with the summary of the testimony; **July 6, 2026**: due date for written comments; **July 7, 2026**: public hearing at the U.S. International Trade Commission.

#### *Section 301 Investigation on Brazil*

On June 1, 2026, USTR issued an affirmative determination in its Section 301 investigation on Brazil's acts, policies, and practices related to unfair digital trade and electronic payment services; unfair, preferential tariffs; insufficient anticorruption enforcement; insufficient intellectual property protections; failure to provide reciprocal ethanol market access; and illegal deforestation. USTR has found that these acts, policies, and practices are actionable, as they are unreasonable or discriminatory and burden or restrict U.S. commerce. As a result, USTR has proposed applying tariffs of 25% on all goods from Brazil, with certain exemptions similar to those listed in the forced labor investigations.

USTR has requested public comment on its proposed action, particularly regarding the scope of the tariff coverage. Following the comment period, USTR will also hold a public hearing. The schedule for comments and the hearing is as follows: **June 22, 2026**: due date for requests to appear at the hearing, along with the summary of the testimony; **July 1, 2026**: due date for written comments; **July 6, 2026**: public hearing at the U.S. International Trade Commission.

#### *Section 301 Investigation on Vietnam*

On May 29, 2026, USTR initiated a new Section 301 investigation of the acts, policies, and practices of the Government of Vietnam related to intellectual property protection and enforcement. In its announcement, USTR explained that Vietnam has been identified as a priority foreign country and that Vietnam has demonstrated a persistent failure to resolve long-standing concerns about IP protection and enforcement. USTR is inviting comments on this investigation, including on the acts, policies, and practices of Vietnam

related to the denial of adequate and effective protection of IP rights and whether any action should be taken to address these acts. While the investigation is focused on IP-related issues, USTR has the ability to propose actions applying to a wide range of products to address unreasonable or burdensome acts, policies, and practices identified as part of its investigation. Comments on this Section 301 Investigation are due no later than **July 2, 2026**.

*Comments on U.S.-China Board of Trade*

On June 2, 2026, USTR announced a public comment process regarding the development of a new government-to-government mechanism – a U.S.-China Board of Trade – intended to manage bilateral trade between the United States and China on an ongoing basis. Public comment is also being sought on specific types of non-sensitive products that could potentially benefit from tariff modifications with the objective of achieving balance and reciprocity in the U.S.-China trade relationship. The deadline for submission of comments is **July 10, 2026**, and rebuttal comments are due by **July 27, 2026**.

Each of these comment periods presents an important opportunity for companies to make their voices heard as the Administration contemplates additional tariffs. Wiley has robust International Trade, Supply Chain, and Customs practices with extensive experience helping clients navigate Section 301 and broader trade issues and is well-positioned to help companies who would like to participate in any of the processes referenced above. Should you have any questions, please contact one of the listed attorneys.

Trump Administration Tariff Tracker