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Trade Lines

Policy Intelligence for Global Business Leaders

Trade Lines brings you timely updates from DC on global trade and regulatory policy. Curated for business leaders and decision-makers, this newsletter highlights key shifts in trade policy –from tariff shifts and supply chain disruptions to legislative developments and compliance trends. Stay ahead, evaluate impact, and make informed decisions in a rapidly changing environment.

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Policy Pulse

International Trade Commission requests comments on its Section 338 obligations

The U.S. International Trade Commission (ITC) has launched a [public comment](#) process on how it should carry out its responsibilities under Section 338(g) of the Tariff Act of 1930, a little-used provision that requires the agency to identify and report foreign trade practices that discriminate against U.S. commerce and provide recommendations to the President. The ITC notes that it does not currently have a formal process for gathering information on such foreign actions and is seeking feedback on what practices should fall within the statute, how information should be collected, and how recommendations should be communicated to the President. The request comes as Section 338 has gained new attention following its recent use as the legal basis for U.S. trade actions targeting Canadian goods. Comments are due by November 9, 2026.

White House orders review of country-of-origin labelling for beef products

The White House issued an [executive order](#) September 4 on *Supporting America's Ranchers*. The order directs the Agriculture Secretary, in consultation with the U.S. Trade Representative, to review country-of-origin labelling for beef products and propose new regulations and legislative recommendations regarding such labelling. This comprehensive policy and regulatory review is due to the President within 90 days. See a White House fact sheet [here](#).

Administration announces new actions on Canadian goods

On September 8, President Trump issued five proclamations under Section 338 of the Tariff Act of 1930 that revise the 50% tariffs announced in July (and which took effect on August 22) on certain Canadian goods and prohibit imports of selected Canadian alcoholic beverages, dairy products, and motor vehicle-related goods. The White House described the measures as a response to Canada's continued and additional trade actions affecting U.S. exports. The tariff-list changes take effect September 15, while the import bans take effect September 29. See a more detailed EY alert [here](#).

In response, Canada - U.S. Trade Minister Dominic LeBlanc [posted](#) on social media that Canada is "assessing the latest tariff measures from the United States" and that he is "in contact with Ambassador Greer."

Hill Highlights

House to consider Russia and Iran sanctions bill next week

The House Committee on [Rules](#) will consider the [Lindsey O. Graham Sanctioning Russia and Iran Act of 2026](#) on Monday at 4pm. A vote could occur on Monday evening.

The bill would expand sanctions on Russia and Iran and establish a new authority allowing the President to impose tariffs of up to 100% on all imports from countries that are among the five largest purchasers of Russian energy or facilitate sanctions evasion. As written, tariffs imposed under this secondary tariff authority would stack on top of other tariffs, including tariffs imposed under Section 232 of the Trade Expansion Act of 1962. Despite concerns over the bill's tariff provisions, the Senate passed the bill 86-11 before leaving for the August recess.

China Select Committee schedules hearing to examine import controls and supply chain risks

The House Select Committee on China will hold a [hearing](#) on September 16 titled "Import Controls: Tools to Counter China's Industrial Policy and Supply Chain Threats". Witnesses include Craig Singleton of the Foundation for Defense of Democracies, Oren Cass of American Compass, and Peter Harrell of Georgetown Law School's Institute of International Economic Law. The hearing is scheduled for 10:00 a.m. in the Cannon House Office Building and will be livestreamed [here](#).

House lawmakers request DHS briefing UFLPA implementation

On September 3, Chairman of the Select Committee on China, Rep. John Moolenaar (R-MI), led a [letter](#) signed by seven other bipartisan lawmakers to Department of Homeland Security (DHS) Secretary Markwayne Mullin requesting a briefing on DHS's "efforts to prevent goods made wholly or in part with forced labor from entering" the U.S. Specifically, the letter requests a briefing within 30 days that includes "an update on the Department's implementation of the Uyghur Forced Labor Prevention Act (UFLPA) and enforcement of additional U.S. trade laws preventing the influx of illegally traded goods originating from the People's Republic of China (PRC) that harm American industries and workers." For a detailed list of what items the lawmakers request further information on, see the China Select Committee's [press release](#).

Key Dates

September 15: Deadline for CBP's next IEEPA refund update to the CIT; modifications to scope of Canadian products subject to additional duties under Section 338 proclamations take effect.

September 15-17: WTO Public Forum takes place in Geneva.

September 22: USTR hearing on Section 301 investigation into Germany's pharmaceutical pricing practices.

September 24: President Trump and Chinese President Xi Jinping meet in Washington, D.C.

September 29: Section 232 tariffs on branded pharmaceuticals take effect for all companies; import bans on certain Canadian products under Section 338 proclamations take effect.

October 24: USTR findings due in Section 301 investigation related to China's Phase One commitments.

November 10: U.S.-China trade truce expires.

November 30: USTR findings due in Section 301 investigation into Vietnam's IP practices.

December 1: Comments due to CBP concerning new requirements to increase visibility into supply chains

If you have questions, please contact Blake Harden (blake.harden@ey.com).

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