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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

CBP says phase three of IEEPA tariff refund process will start October 6 for plaintiffs

In an [update](#) filed with the U.S. Court of International Trade (CIT) on September 15, U.S. Customs and Border Protection (CBP) said it “will deploy CAPE Phase 3, which covers finally liquidated entries filed by plaintiffs for which the Court has ordered reliquidation, on October 6, 2026” in relation to duties paid under the International Emergency Economic Powers Act (IEEPA). According to the [court](#), “[t]his means that plaintiffs in individual cases will have the opportunity to submit a CAPE Declaration for processing that will result in the refund of [IEEPA] duties on finally liquidated entries.”

In its filing, CBP also reported that as of 3pm on September 11, refunds of “approximately \$122 billion have been completed using the CAPE Refund component” and sent to Treasury “for disbursement.” CBP is required to file its next progress report by October 6.

USTR convenes 50 trading partners for training on forced labor import prohibitions

In a [press release](#), the Office of the U.S. Trade Representative (USTR) said representatives of over 50 trading partners from around the world were convened on September 15 “to provide training related to imposing and effectively enforcing forced labor import prohibitions.” This follows USTR’s Section 301 investigation into the effective enforcement of forced labor import bans. The press release notes that “by July 2026, 12 additional economies had adopted measures that prohibit the importation of goods made by forced labor, including Cambodia, Canada, Ecuador, the European Union, Guatemala, Honduras, India, Indonesia, Mexico, Pakistan, Sri Lanka, and Trinidad and Tobago.” USTR said that the “Administration remains committed to addressing this unfair trade practice by working with these and other trading partners to set a new, global standard for combating the trade in forced labor goods.”

USTR requests comments for annual National Trade Estimate Report

USTR is [requesting](#) comments to aid in its upcoming publication of the National Trade Estimate Report on Foreign Trade Barriers. The report, which USTR is required to publish annually, “sets out an inventory of significant foreign barriers or distortions of U.S. intellectual property; foreign direct investment by U.S. persons... and U.S. electronic commerce.” The notice provides a detailed list of topics on which USTR is seeking information. In the notice, USTR also said they will consider responses “as part of the annual review of the operation and effectiveness of all U.S. trade agreements regarding telecommunications products and services that are in force with respect to the U.S.” The deadline for comment submission is October 29.

USITC study examines effects of China PNTR revocation

A new U.S. International Trade Commission (USITC) [report](#) requested by Congress finds that revoking China’s Permanent Normal Trade Relations (PNTR) status would raise the cost of Chinese imports and prompt U.S. consumers and businesses to shift sourcing toward domestic suppliers and other trading partners, particularly Mexico, Vietnam, and Taiwan. The USITC estimates that U.S. imports from China would fall 30.8% after six years, while “U.S. consumers and producers would face price increases of 0.7 percent and 0.5 percent, respectively, in the long run.” The report also estimates that “higher prices on intermediate goods would reduce real output by 0.2 percent in the long run.” The report projects increased production in some industries that compete with Chinese imports, while businesses that rely on Chinese inputs would face higher costs. The report also compares the economic impact of an immediate PNTR status revocation with a five-year phase-in – concluding that a five-year “phase-in period would allow time for U.S. manufacturers to both expand capacity and mitigate the potentially large price increases in the first several years.” Overall, the study concludes that PNTR revocation would result in broad changes to sourcing decisions, trade patterns, prices, and production throughout the U.S. economy.

Commerce issues final dumping and countervailing duty rates on silicon photovoltaic cells

The Department of Commerce's International Trade Administration [issued](#) final antidumping and countervailing duty rates on crystalline silicon photovoltaic cells imported from India, Indonesia, and Laos. The rates—applicable September 16—vary on a country-by-country basis are as follows:

- India: 123.04% dumping rate and 126.09% countervailing duty rate
- Indonesia: 94.36% dumping rate and 73.2%-173.7% countervailing duties depending on the producer
- Laos: 65.43% dumping rate and 82.03%-153.67% countervailing duties depending on the producer

A fact sheet is available [here](#). The Department of Commerce will issue duty orders at these rates if the U.S. International Trade Commission votes to issue a final affirmative injury determination. This vote is [scheduled](#) for October 14.

Hill Highlights

House lawmakers pass Russia and Iran sanctions bill

On September 15, House lawmakers passed the *Lindsey O. Graham Sanctioning Russia and Iran Act* of 2026 by a vote margin of 262-159. The bill includes new authority for the president to impose, within 30 days from the date of enactment, tariffs of up to 500% on all Russian imports and of up to 100% on the top five purchasers of Russian oil and natural gas, as well as the top five countries "facilitating Russian oil sanctions evasion." The President is expected to sign the bill into law in the coming days.

House CCP Committee examines import controls

The House Select Committee on the Chinese Communist Party held a September 16 hearing on China's industrial policies and supply chain issues. During the hearing, members and witnesses discussed sectors including rare earths and critical minerals, semiconductors, connected vehicles, drones, robotics, telecommunications equipment, power inverters, internet routers, battery storage, pharmaceuticals, medical devices, port equipment, and artificial intelligence technologies. Witness Craig Singleton argued that the United States needs "a doctrine for the inbound side of technology competition" and discussed risks associated with Chinese technologies entering U.S. markets and critical infrastructure.

The hearing also focused on legislative and regulatory approaches to supply chain security. Chairman John Moolenaar (R-MI) highlighted the bipartisan [Connected Vehicle Security Act](#) and [GUARD Act](#), stating that they are "two of the bills we need to do that" when discussing efforts to strengthen U.S. import-control authorities. Witnesses also discussed the Commerce Department's Information and Communications Technology and Services (ICTS) authorities and the Connected Vehicle Security Act. Separately, Rep. Ashley Hinson (R-Iowa) highlighted the [Drug Origin Transparency Act](#), which she developed with Rep. Doris Matsui (D-Calif.), describing it as legislation that would provide the Food and Drug Administration (FDA) authority

to require additional reporting on pharmaceutical supply chains, including active pharmaceutical ingredient (API) suppliers and original manufacturers.

Rewatch the hearing [here](#).

Ways and Means Committee advances bill on forced labor in cobalt mining

The House Ways and Means Committee advanced the *Stop China's Exploitation of Congolese Children and Adult Forced Labor through Cobalt Mining Act* on September 16 by a margin of 32-8. This bill would require the Forced Labor Enforcement Task Force (FLETF) to conduct a report concerning "the alleged use of forced labor in the cobalt mining industry" of the Democratic Republic of Congo. The bill requires submission of the report to relevant congressional committees within 180 days.

A fact sheet is available [here](#).

Key Dates

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.

September 30-October 1: G20 Trade Ministerial located in Milwaukee, Wisconsin scheduled.

October 6: CBP deployment of Phase 3 IEEPA refund capabilities covering finally liquidated entries.

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

October 29: Deadline to submit comments to USTR on its National Trade Estimate Report.

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

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

December 1: Deadline to submit comments to CBP concerning new supply chain visibility requirements.

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

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