

30 Days Remain to File Section 301 Tariff (List 3) Exclusion Requests

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Thirty days remain to file exclusion requests for List 3 of the Section 301 tariffs on products imported from China. The official deadline for electronic submission of exclusion requests is September 30, 2019.

The U.S. Trade Representative announced List 3 on September 21, 2018. This third list imposed additional duties on approximately \$200 Billion worth of goods imported from China. The exclusion process was finally announced on June 24, 2019. Any exclusion which is granted will be effective from the date on which the tariff was initiated and will last for one year. A copy of that announcement is available [here](#).

Those interested in filing an exclusion must provide certain economic, sourcing, and commercial impact data prior to the September 30 deadline. This development of historic data may require some lead time, because it is often the most time consuming activity in preparing exclusion requests. The request will also provide well-reasoned arguments principally based on: (1) availability of the product outside of China; (2) sourcing activities outside of China; (3) the actual or potential negative economic impact of an increased duties; and (4) the strategic importance of the product from technological and national security perspectives. Any person may provide public response to an exclusion request within fourteen days, to which a reply may be posted within seven days.

The Benesch team assists clients with global supply chain management matters including sourcing strategies, tariff mitigation including exclusions, and import compliance.

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