



Issues Overview

Trade, Tariffs, and Customs Compliance

About the American Association of Exporters and Importers (AAEI)

For more than 100 years, the American Association of Exporters and Importers (AAEI) has been a trusted voice for the U.S. international trade community. AAEI represents companies across the global supply chain—including manufacturers, importers, exporters, retailers, customs brokers, freight forwarders, and other trade service providers. AAEI is widely recognized for its technical expertise in the day-to-day administration and compliance of U.S. import and export laws. By bringing together practitioners directly involved in global trade, the association serves as a vital resource on the policies, regulations, and operational issues that shape international commerce.



CONGRESSIONAL OVERSIGHT OF TARIFF POLICY

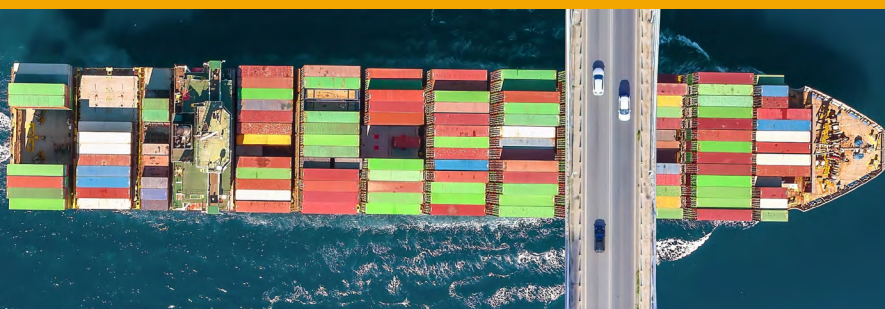
The AAEI supports robust Congressional oversight of Sections 232, 301, and 122 tariffs to ensure accountability, transparency, and workable compliance guidance for American importers.

Core Advocacy Goals:

The rapid and expansive use of tariff authority under Section 232, Section 301, and now Section 122 has created significant compliance uncertainty for American importers with no meaningful feedback loop to Congress on whether these policies are working or whether affected industries can realistically comply. Businesses are being asked to meet complex obligations without adequate public guidance, consistent enforcement, or any formal opportunity to report back on the real-world impacts.

AAEI urges Congress to exercise its existing oversight authority to:

- **Require regular reporting** from the Administration on the effectiveness of 232, 301, and 122 tariff policies, including assessments of importer compliance capacity and the adequacy of customs guidance provided.
- **Mandate public comment opportunities** on tariff application and scope before and during implementation, ensuring that affected industries have a formal mechanism to communicate economic impacts.
- **Demand clear, public compliance guidance** from Commerce and CBP on how tariff obligations are calculated and enforced, so that importers are not left navigating conflicting informal instructions from agency field offices, with potential penalties for good-faith errors as the consequence.
- **Establish an interim safe-harbor** for importers who used reasonable, good-faith valuation methods in the absence of formal guidance, ensuring that those who attempted to comply are not retroactively penalized for the government's own failure to provide clear rules.





IEEPA TARIFFS: REFUNDS AND RELIEF

The AAEI calls on Congress to ensure the Administration refunds IEEPA tariffs through an automated, equitable system for affected importers.

Core Advocacy Goals:

The Supreme Court has ruled that the IEEPA tariffs were unlawfully imposed. Americans have absorbed significant and unanticipated costs as a result, and Congress must act to ensure that affected importers are refunded promptly and efficiently.

AAEI supports the following:

- **Immediate automated refunds** of IEEPA tariffs for eligible importers, modeled on the successful mechanisms used for GSP (Generalized System of Preferences) refunds and the U.S. v. Shoe Corp claims process.
- **No protests or litigation should be required** to secure refunds. These procedures would create unnecessary congestion within CBP's administrative processes and impose avoidable compliance costs on importers—particularly small and mid-sized businesses.
- **Congressional pressure on the Administration** to establish a structured, transparent refund process rather than requiring importers to pursue relief on a case-by-case basis.



USMCA REAUTHORIZATION

The AAEI strongly supports the continuance of the United States-Mexico-Canada Agreement (USMCA) and urges Congress to protect the integrity of its Rules of Origin framework.

Core Advocacy Goals:

USMCA has provided critical stability and predictability for North American supply chains. As the agreement approaches its review period, AAEI urges Congress to ensure its reauthorization and to safeguard the agreement's foundational principles:

- **Support reauthorization/continuance of USMCA** to preserve the rules-based trading framework that American exporters and importers depend on.
- **Oppose the commingling of investment criteria with customs Rules of Origin.** Rules of Origin are technical, customs-based standards designed to determine the eligibility of goods for preferential tariff treatment. Introducing investment policy considerations into this framework would create confusion, undermine supply chain planning, and expose businesses to unpredictable compliance outcomes.
- **Maintain clarity and stability** in USMCA implementation so that businesses can make long-term sourcing and investment decisions with confidence.

AAEI looks forward to engaging with Members and staff on these priorities and stands ready to serve as a resource on the day-to-day realities facing America's import and export community.

