

USTR Issues 3-Month Extension for Certain Section 301 Tariff Exclusions on Chinese Imports

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On May 31, 2025, the Office of the United States Trade Representative (USTR) issued a Federal Register [notice](#) extending specific product exclusions from Section 301 tariffs on Chinese imports. This extension affects 164 previously reinstated exclusions, and 14 exclusions related to solar manufacturing equipment, now valid through August 31, 2025.

The USTR's decision builds on a series of prior actions stemming from the statutory four-year review of Section 301 tariffs on Chinese-origin goods. Initially imposed in 2018 and 2019 under the Trade Act of 1974 in response to China's unfair trade practices related to technology transfer, intellectual property, and innovation, the tariffs covered four separate tranches of goods. Over time, the USTR established exclusion processes to provide temporary relief for certain products, including machinery, medical supplies, electronics, and industrial components. Many of these exclusions expired but were subsequently reinstated or extended based on economic necessity, supply chain disruption, and input from U.S. stakeholders. The current extension reflects USTR's ongoing effort to balance enforcement of trade policy objectives with minimizing domestic economic harm, particularly in sectors reliant on specific components that remain difficult to source outside of China.

Key Details

The extended exclusions are organized under two distinct subheadings of the Harmonized Tariff Schedule of the United States (HTSUS)

- Annex A pertains to exclusions under heading 9903.88.69 and U.S. notes 22(vvv)(i)-(iv) to subchapter II of chapter 99 of the HTSUS. These exclusions encompass 164 products previously extended in [May 2024](#), covering a range of items such as industrial components, medical devices, and machinery parts. The extension applies to goods entered for consumption, or withdrawn from warehouse for consumption, on or after 12:01 a.m. EDT on June 1, 2025, and before 11:59 p.m. EDT on August 31, 2025.
- Annex B addresses exclusions under heading 9903.88.70 and U.S. note 20(www) to subchapter III of chapter 99 of the HTSUS. This includes 14 product exclusions granted in [September 2024](#), specifically related to solar manufacturing equipment (e.g., wafer slicers, cell interconnection machinery, module laminators). The extension applies to goods entered for consumption, or withdrawn from warehouse for consumption, on or after 12:01 a.m. EDT on June 1, 2025, and before 11:59 p.m. EDT on August 31, 2025.

Implications for Importers

- Importers should review the updated HTSUS provisions to determine if their products qualify for the extended exclusions.
- U.S. Customs and Border Protection will issue instructions on entry guidance and implementation of these exclusions.
- The USTR may consider further extensions or modifications as appropriate.

The USTR's decision to extend exclusions under Section 301 provides short-term relief for importers relying on affected Chinese-origin goods. However, the extension is limited in duration, set to expire on August 31, 2025. Companies should proactively review their supply chains, confirm whether their products are covered under the updated HTSUS notes, and prepare for potential re-imposition of tariffs after the new expiration date.

This alert is intended as a guide only and is not a substitute for specific legal or tax advice. Things are rapidly changing by the day and hour, and our Tariff Task Force will do its best to provide timely and relevant updates as things progress. Please don't hesitate to reach out to us with questions.

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