

White House Releases List of Products Excluded From Reciprocal Tariffs

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On April 11, the White House released a [Presidential Memorandum](#), “Clarification of Exceptions Under Executive Order 14257 of April 2, 2025, as Amended,” which exempts a list of semiconductors and electronics from reciprocal tariffs issued under [Executive Order 14257](#), “Regulating Imports with a Reciprocal Tariff to Rectify Trade Practices that Contribute to Large and Persistent Annual United States Goods Trade Deficits,” as amended by [Executive Order 14259](#), “Amendment to Reciprocal Tariffs and Updated Duties as Applied to Low-Value Imports from the People’s Republic of China,” and as further amended by the [April 9 Executive Order](#), “Modifying Reciprocal Tariff Rates to Reflect Trading Partner Retaliation and Alignment” (collectively, Reciprocal Tariffs).

All products that entered for consumption, or were withdrawn from warehouses for consumption, on or after 12:01 AM EDT on April 5, 2025, and are properly classified in following headings and subheadings of the Harmonized Tariff Schedule of the United States (HTSUS) are excluded from the Reciprocal Tariffs (collectively, Excluded Products):

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- | | |
|--------------|--------------|
| • 8471 | • 8541.30.00 |
| • 8473.30 | • 8541.49.10 |
| • 8486 | • 8541.49.70 |
| • 8517.13.00 | • 8541.49.80 |
| • 8517.62.00 | • 8541.49.95 |
| • 8523.51.00 | • 8541.51.00 |
| • 8524 | • 8541.59.00 |
| • 8528.52.00 | • 8541.90.00 |
| • 8541.10.00 | • 8542 |
| • 8541.21.00 | |
| • 8541.29.00 | |

The HTSUS numbers encompass a range of products, including semiconductors and electronic integrated circuits, along with other items such as smartphones, solid-state non-volatile storage devices, flat panel display modules, and various types of monitors. Refunds are available for Excluded Products that were unnecessarily or improperly subjected to Reciprocal Tariffs after the April 5 effective date. U.S. Customs and Border Protection [guidance](#) states that importers may request a refund by filing a post summary correction for unliquidated entries, or by filing a protest for entries that have liquidated but where the liquidation is not final because the protest period has not expired.

Importers should report the secondary classification under HTSUS heading 9903.01.32 to declare the exception from the Reciprocal Tariff provided in heading 9903.01.25, or in headings 9903.01.43 – 9903.01.62 or 9903.01.64

– 9903.01.76 on April 9, or in heading 9903.01.63 since April 9.

While the memorandum has not specifically identified an end date for these exclusions, U.S. Commerce Secretary Howard Lutnick [stated](#) that the exemptions for semiconductors and related electronics from Reciprocal Tariffs are temporary. He announced that these products, including smartphones, computers, and flat panel displays, would face separate “semiconductor tariffs” within a “month or two.” Secretary Lutnick emphasized that these tariffs aim to encourage reshoring of semiconductor and electronics production to the U.S., citing national security and the need to reduce reliance on foreign supply chains, particularly in Southeast Asia and China. While these clarified exclusions are a big relief, the impending changes have created uncertainty within the tech industry, with companies facing potential cost increases and supply chain disruptions if their now-excluded products become subject to additional tariffs in the future.

Conclusion

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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