

NORTH AMERICA

# Customs & Trade: Monthly Insights

**North America Customs and Trade Compliance Insights is a monthly update covering key customs and trade compliance developments across the U.S., Mexico, and Canada.**

## **IEEPA Refund Portal Live, Phase 1**

Phase 1 of the CAPE Refund Portal became available in ACE on April 20, enabling users to view and manage refund opportunities associated with IEEPA tariffs. Phase 1 applies only to certain unliquidated entries and certain entries within 80 days of liquidation. CBP plans to deploy CAPE through a phased development approach, with additional functionality added in future phases to address more complex entry scenarios. To learn more, refer to the [CAPE Information Notice](#), and for filing details, see the [CAPE Refund Quick Reference Guide](#); technical questions may be directed to [IEEPARefunds@cbp.dhs.gov](mailto:IEEPARefunds@cbp.dhs.gov). **For additional guidance**, including a webinar recording, visit our [IEEPA Refund Resource](#) page — Omni Trade Services is here to support your refund claims; contact your OTS representative for assistance.

## **Section 232 Assessment Changes**

On April 2, 2026, a U.S. Presidential Proclamation was issued modifying how Section 232 duties are assessed for certain aluminum, steel, and copper products. The changes apply to goods entered for consumption or withdrawn from warehouse for consumption on or after 12:01 a.m. EDT on April 6, 2026. Under the updated methodology, Section 232 duties are assessed on the full entered value of covered articles rather than only the metal content value, as defined in Annexes I-A, I-B, II, III, and IV to the proclamation. CBP implementation guidance is provided in [CSMS #68253075](#) and applies based on entry date with no transition period.

## **USMCA Renewal Review Underway**

The first USMCA joint review is due by July 1, 2026, at which time the United States, Canada, and Mexico must decide whether to extend the agreement for an additional 16 years or allow it to enter a potential termination period. The trilateral review must commence no later than this date, during which the parties may propose and negotiate changes. Any proposed changes must be communicated to the other parties at least 30 days in advance, and major amendments would require congressional approval. If a renewal is not approved on July 1, the agreement would continue in force but begin a process that could result in expiration after 10 years unless the parties later agree to extend it.

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## **New Section 301 Investigations on Forced Labor**

The Office of the United States Trade Representative (USTR) initiated [Section 301 investigations](#) into 60 economies to examine acts, policies, and practices related to the implementation and enforcement of measures addressing the importation of goods produced with forced labor, with public hearings scheduled to begin April 28, 2026. Investigation findings could result in additional Section 301 duties or other trade restrictions affecting a broad range of countries and products. Importers should monitor developments closely, as outcomes could increase forced-labor-related compliance expectations, introduce additional cost exposure, and elevate supply-chain due diligence and documentation requirements.

## **Customs Bonds Under Heightened Trade Policy Uncertainty**

Importers are facing increased customs bond risk as several trade policy developments align in 2026. Uncertainty surrounding Section 122 tariffs, which currently apply a temporary global 10 percent duty and are scheduled to expire on July 24, 2026, occurs alongside recent Section 232 assessment changes for certain aluminum, steel, and copper products, expanded Section 301 investigations covering 60 economies, and the upcoming July 1 USMCA joint review. As tariff rates, assessment methodologies, and enforcement priorities evolve, assessing [customs bond sufficiency](#) should be a primary concern for importers to avoid delayed cargo release, unexpected financial obligations, and compliance disruptions. Potential additional Section 301 duties, possible changes to Section 122 tariff rates, and shifting entry and liquidation patterns can all affect bond calculations and prompt CBP bond increase demands.

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