U.S. Tariff Monthly Report — September 2026

Invoice × Tariff · Issue 202609 Coverage: Federal Register actions and official announcements published 2026-09-01 through 2026-09-30 · Published: 2026-09-26 · **Revised edition 2026-10-01** (adds Sep 26–30 developments) · Source: Federal Register API + the invoicetariff.com Tariff Radar

> **September in one line**: 32 FR notices tracked (27 in the Sep 26 first edition, 5 added), plus 2 official announcements (the U.S.–China truce extended two months to 2027-01-10; the Board of Trade 30-FOR-30 tariff-relief framework); the pharma Section 232 general tier of 20% started being collected on 09-29; from 2026-10-01 the MPF min/max move to $34.58/$670.86, the Q4 underpayment interest rate is 7%, and the FY2027 raw cane sugar supplementary TRQ allocation of 55,993 MTRV becomes enterable.

1. The Month at a Glance

Metric	Value
FR notices tracked	32 (through 2026-09-30; first edition: 27)
Substantive duty/quantity actions (Section 232/338)	4 (plus: pharma 232 general tier of 20% took effect 09-29)
China 301 truce developments (official announcements)	2 (truce extended to 2027-01-10; Board of Trade 30-FOR-30)
Intellectual-property Section 337 actions	8 (incl. 1 general exclusion order)
Quota / fee / interest-rate items	6
Customs-process and other procedural notices	11
Non-tariff notices (no HTS impact)	3

The four actions most likely to matter to cross-border sellers:

1. **U.S.–China truce extended two months to 2027-01-10** (announced 09-23, FR confirmation pending): the truce elements — the 24% reciprocal-tariff suspension, fentanyl rates, the 178 China 301 exclusions, and the port-fee standdown — all roll forward; until FR confirms, the 301 exclusions still expire 11-10.
2. **Polysilicon Section 232 anti-stockpiling temporary final rule** (91 FR 60505): weekly import volume caps for new importers of record, with entry bans for over-cap importers, in effect through **2026-12-04**.
3. **Section 232 pharma, twice over**: implementation guidance created zero-rate heading **9903.04.70** (91 FR 60360, "otherwise-applicable rate + 0%" for non-commercial use); and the general tier of 20% started applying on **09-29** (rising to 100% on 2030-04-02, with exemption/adjustment lanes for generics and onshoring commitments).
4. **Section 338 scope changes on Canadian goods** (Proclamations 11064/11065): the 50% additional-duty lists for motor vehicles (8701–8705) and alcoholic beverages (2203–2208) were modified, effective **2026-09-15 12:01 ET**.

2. Deep Dives

2.1 Polysilicon anti-stockpiling: weekly caps for new importers (91 FR 60505)

To support the polysilicon measures in Proclamation 11052, BIS issued a temporary final rule: **new importers of record** (those without prior entries of the covered goods) face weekly volume caps, and are barred from further entries once over cap. Existing importers of record found by Commerce to be stockpiling can be barred from entering covered goods through 2026-12-04 (waivers available).

Covered goods	HTSUS	Weekly cap (new importers)
Polysilicon	2804.61.00	12 kg
Doped polysilicon products	3818.00.0020/.0040/.0045/.0050/.0091	7 kg
Photosensitive semiconductor devices	8541.42.00	2,000 units
Other goods of 8541.43.00	8541.43.00	55 units

Why it matters for solar supply chains: the rule targets front-running of the tariff schedule by new entrants and stockpiling by incumbents. Importers of modules and cells who were planning to shift volume to a fresh importer-of-record should reassess compliance risk. This is a temporary final rule in effect through **2026-12-04** and may be amended or extended — track it via the Tariff Radar.

Source: FR 2026-19537 — Measures To Restrict Stockpiling of Polysilicon and Polysilicon Derivatives Under Proclamation 11052

2.2 Section 232 pharma guidance: zero-rate heading 9903.04.70 (91 FR 60360)

Presidential Proclamation 11020 (April 2, 2026) imposed a 100% additional tariff on pharmaceuticals; this BIS guidance implements it and opens a zero-rate lane for non-commercial use. Four changes:

Change	Detail
New heading 9903.04.70	Pharmaceutical articles and associated ingredients solely for clinical trials, R&D, or other non-commercial applications → **otherwise-applicable rate + 0%**
U.S. note 40(a) range	Covered headings extended from 9903.04.60–.69 to 9903.04.60–**.70**
"Generic pharmaceutical articles" definition	Note 40(c)(iii) (heading 9903.04.67) expanded to include unpatented animal-health products
Annex cleanup	5 overlapping codes removed from Proclamation 11020 Annex IV: 2937.23.50, 3002.13.00, 3002.14.00, 3002.15.00, 3004.49.00

Why it matters for pharma and API importers: the landed-cost math for R&D samples and clinical-trial articles changes — entry under 9903.04.70 avoids the 100% additional tariff, but "solely for non-commercial use" is exactly where scrutiny lands. Prepare the entry narrative and documentation before relying on it.

Revision note (checked 10-01): the pharma 232 general tier of 20% has applied since **2026-09-29** (rising to 100% on 2030-04-02); generics and companies with U.S. onshoring commitments may qualify for exemptions or adjustments. This site's calculator already stacks the 20% general tier for Chapter 30 headings.

Source: FR 2026-19498 — Guidance and Procedures for Implementing Tariff Adjustments for Specialty Pharmaceuticals

2.3 Canada 50% additional-duty scope changes, effective 2026-09-15 (Proclamations 11064/11065)

Two proclamations revised the scope of the 50% additional duties on Canadian products, both effective **2026-09-15 12:01 ET**:

- **Motor vehicles** (Proclamation 11065, 91 FR 58339): products listed in Proclamation 11048 Annex II moved into scope (Annex I Part A) or out of scope (Annex I Part B); adjustments sit within chapters 8701–8705.
- **Alcoholic beverages** (Proclamation 11064, 91 FR 58331): the same Part A/Part B treatment applied to Proclamation 11046, within chapters 2203–2206/2208.

Caution: the annexes are published as images — verify individual classifications against the annex tables. Canada-bound shippers and North America lane forwarders should re-check affected entries line by line.

Sources: FR 2026-18839 (motor vehicles) · FR 2026-18838 (alcoholic beverages)

2.4 The China front: truce extended to 2027-01-10, and the 30-FOR-30 framework debuts (revision)

Late September was dense with U.S.–China engagement (the 9/25 state visit), and the two developments that matter most to cross-border e-commerce both happened outside the Federal Register — watch the implementation cadence closely:

- **Truce extended two months** (announced 09-23 by Treasury Secretary Bessent): the Busan truce elements — the 24% reciprocal-tariff suspension, fentanyl rates, the 178 China 301 product exclusions, and the port-fee standdown — move their expiry from 2026-11-10 to **2027-01-10**. This is currently a Cabinet-level statement with the FR notice still pending; until FR confirms, the 301 exclusions and other dated items still follow the 11-10 schedule (this site's radar tracks a 2027-01-10 entry and will update as soon as FR lands).
- **Board of Trade 30-FOR-30** (White House, 09-27): $30 billion of non-sensitive goods in each direction "considered for preferential tariff treatment" — from China to the U.S.: **small appliances, toys, festive decorations, and child safety seats**; from the U.S. to China: agricultural products, seafood, logs and wood products, cosmetics, and medical devices. For now this is only a proposed list (subject to each side's domestic legal process, FR publication pending on the U.S. side); no current rate changes and no effective date.

What it means for sellers: the truce extension pushes the restoration of Section 301 list rates (e.g., List 3 at 25%) back by two months — buyers of the 178 excluded product groups (including fasteners) get

breathing room. If 30-FOR-30 lands, toys/small appliances/festive decorations are core China-to-U.S. export categories — put both items on the Q4 review list and wait for the FR document numbers before acting.

Sources: White House Board of Trade release · Truce extension coverage (Politico)

3. Quotas, Fees, and Interest Rates Calendar

Item	Value	Effective / applies	Source
Q4 customs underpayment interest rate	7% (corporate and non-corporate)	2026-10-01 to 2026-12-31	FR 2026-19292
Q4 customs overpayment (refund) interest rate	7% non-corporate / 6% corporate	2026-10-01 to 2026-12-31	Same
FY2027 raw cane sugar TRQ total	1,117,195 MTRV (supplementary allocation of 55,993 MTRV to 28 countries)	Enterable from 2026-10-01	FR 2026-19399
Dairy TRQ import license fee, 2027 quota year	$325 per license ($631,516 ÷ est. 1,950 licenses)	2027 quota year	FR 2026-17954
Dairy licensing appendix adjustment	Net 3,144,542 kg shifted from historical to lottery licenses (Appendix 1: 39,606,581 kg; Appendix 2: 70,157,914 kg)	2027 quota year	FR 2026-17952
WTO agricultural safeguard trigger levels	30+ categories updated, e.g. beef 608,799 MT; nonfat dry milk 4,375,733 kg; cheddar cheese 13,939,120 kg; raw cane sugar 769,561 MT	2026/10–2027/9	FR 2026-17953
AGOA apparel duty-free limit for sub-Saharan Africa (revision)	Annual aggregate of 1,690,799,016 square meter equivalents (a 7% cap on the preceding 12 months' imports); lesser-developed-beneficiary sub-limit 845,399,508 SME (3.5%)	2026-10-01 to 2027-09-30	FR 2026-19191

How to read this: a 7% underpayment rate makes carrying disputed duty balances into Q4 expensive — worth resolving before October. Quota-dependent categories (sugar, dairy) switch to the new quota year's numbers on October 1.

4. Section 337 IP Actions: 8 This Month

Mostly procedural, but three deserve attention from electronics, mother-and-baby, and furniture sellers:

- **DDR5 DRAM investigation instituted (337-TA-1523)**: Netlist vs. Micron, HPE, Lenovo, Supermicro. The accused products cover DDR5-generation DIMM modules **and servers, computing systems and**

storage systems containing them. ITC exclusion orders routinely reach downstream products containing infringing components — server and system importers should track this one. Source: FR 2026-19697

- **General exclusion order issued (337-TA-1453)**: final determination finding a Section 337 violation for certain boiler protection for absorption refrigeration systems, with a **GEO** barring imports of the products and components regardless of manufacturer. Source: FR 2026-19543
- **Powered recliner mechanisms instituted (337-TA-1524, added 09-28)**: Leggett & Platt and Ultra-Mek complain against 11 respondents, including **four mainland China manufacturers (Henglin Home Furnishings et al.)** and the Hong Kong Living Style Group; accused products are powered rocker/glider recliner mechanisms and seating units containing them — recliner and motion-sofa exporters should track limited-exclusion-order risk. Source: FR 2026-19713
- Also this month: wearable breast pumps instituted (337-TA-1522, Willow Innovations); flash-spun nonwoven materials (TYVEK case, 337-TA-1424) review-in-part; balloon dilation devices (337-TA-1449) review-in-part with target date extended to 2026-11-13; glow fish tape/safety helmet systems (337-TA-1442) review-in-part; electronic devices with audio technologies instituted (337-TA-1521, BoomCloud 360).

5. Procedural and Process Notices

- **CBP ANPRM on heightened import disclosures** (19 CFR 141/142/143/163, implementing E.O. 14411 "Strengthening Customs Enforcement"): proposed increased import-disclosure requirements, **comments due 2026-12-01**. A leading indicator of future compliance costs — forwarders and compliance teams should start assessing now. Source: FR 2026-17926
- **ACE Electronic Export Manifest (EEM) for Truck Cargo test**: voluntary participation begins 2026-10-23. Source: FR 2026-19414
- **USITC request for comments on Section 338(g) implementation**: comments due 2026-11-09 — Section 338 is the statutory basis for the current Canada additional duties. Source: FR 2026-18385
- Otherwise: 6 CBP commercial gauger/laboratory approvals (09-15: Bennett Testing, Saybolt ×2; added 09-29: Intertek USA ×2, Laboratory Services); PRA revision notice on used self-propelled vehicle exportation; PRA extension request for sugar TRQ certificates of quota eligibility; SEC proposal to rescind the investment-adviser pay-to-play rule; FDIC bank-merger processing reform proposal; PHMSA preemption determination on New Jersey tort claims (none HTS-related).

6. October Watch List

Date	Item
2026-10-01	FY2027 begins: **MPF min/max move to $34.58/$670.86** (91 FR 48398; this site's calculator switches by entry date automatically); sugar TRQ supplementary allocation enterable; Q4 interest rates take effect (7% underpayment); new AGOA apparel annual limit in force
2026-10-23	ACE EEM truck cargo test begins (voluntary)
2026-11-09	USITC Section 338(g) comments due
2026-11-10	China 301 product exclusions expire (pending FR confirmation of the truce extension to 2027-01-10)
2026-11-13	337-TA-1449 (balloon dilation devices) target date
2026-12-01	CBP import-disclosure ANPRM comments due
2026-12-04	Polysilicon 232 anti-stockpiling rule current expiry (watch for extension)
2027-01-10	New expiry for the U.S.–China truce elements (announced 09-23; FR confirmation pending)

7. Put the Report to Work

- **Price a shipment**: open the Tariff Calculator, enter HTS and value — the duty stack (MFN + 301 + 232) is computed automatically.
- **Watch for changes**: the Tariff Radar scans the Federal Register every 12 hours, with optional email alerts.
- **Background reading**: How to Find the HTS Code for Your Product, How U.S. Tariffs Are Calculated, Landed Cost Formula.

About This Report

Compiled monthly by the invoicetariff.com Tariff Radar from public Federal Register data. Rates and quantities are as stated in the FR original text, which prevails; this report is general information, not legal or customs advice — consult a licensed customs broker for entry decisions. Written as of 2026-10-01 (revised edition); superseded content is updated alongside the radar changelog.

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Appendix: All 32 FR Notices + 3 Official Developments

Date	Notice	Type	One-liner
09-02	FR 2026-17926	Process	CBP import-disclosure ANPRM (comments due 12-01)
09-02	FR 2026-17952	Quota	Dairy licensing appendices adjusted: net 3,144,542 kg shifted to lottery licenses
09-02	FR 2026-17953	Quota	WTO agricultural safeguard trigger levels updated for 2026 (30+ categories)
09-02	FR 2026-17954	Fee	Dairy TRQ import license fee $325 for 2027 quota year
09-02	FR 2026-17955	Procedural	PRA extension request: sugar TRQ certificates of quota eligibility
09-09	FR 2026-18302	337	Glow fish tape/safety helmet systems (337-TA-1442) review-in-part
09-09	FR 2026-18382	Non-tariff	PHMSA preemption determination on NJ gasoline-transport tort claims
09-09	FR 2026-18385	Process	USITC comments requested on 338(g) implementation (due 11-09)
09-10	FR 2026-18424	Non-tariff	SEC proposes rescinding investment-adviser pay-to-play rule
09-14	FR 2026-18838	338	Canada alcoholic-beverage 50% duty scope modified (eff. 09-15)
09-14	FR 2026-18839	338	Canada motor-vehicle 50% duty scope modified (eff. 09-15)
09-15	FR 2026-18832	Procedural	CBP approves Saybolt LP (Deer Park, TX) as gauger/laboratory
09-15	FR 2026-18833	Procedural	CBP approves Saybolt LP (Pittsburgh, PA) as commercial gauger
09-15	FR 2026-18834	Procedural	CBP approves Bennett Testing Service as gauger/laboratory
09-17	FR 2026-19045	337	Balloon dilation devices (337-TA-1449) review-in-part, target 11-13
09-17	FR 2026-19073	Procedural	PRA revision: exportation of used self-propelled vehicles
09-18	FR 2026-19175	337	Audio-technology electronic devices instituted (337-TA-1521, BoomCloud 360)

Date	Notice	Type	One-liner
09-18	FR 2026-19191	Quota	AGOA sub-Saharan apparel duty-free annual limit published (eff. 10-01; added)
09-22	FR 2026-19292	Rates	Q4 underpayment interest 7%, overpayment 7%/6% (from 10-01)
09-22	FR 2026-19308	Non-tariff	FDIC bank merger transaction processing reform proposal
09-22	FR 2026-19537	**232**	Polysilicon anti-stockpiling TFR: new-importer weekly caps (through 12-04)
09-23	Official	**301**	Treasury Secretary announces China truce extended two months to 2027-01-10 (FR pending; added)
09-23	FR 2026-19399	Quota	FY2027 raw cane sugar TRQ supplementary allocation 55,993 MTRV
09-23	FR 2026-19414	Process	ACE EEM truck cargo test (from 10-23)
09-23	FR 2026-19498	**232**	Pharma 232 guidance: new zero-rate heading 9903.04.70
09-24	FR 2026-19543	337	Boiler protection final determination + general exclusion order (337-TA-1453)
09-24	FR 2026-19544	337	Flash-spun nonwoven materials (337-TA-1424) review-in-part
09-24	FR 2026-19586	337	Wearable breast pumps instituted (337-TA-1522, Willow Innovations)
09-25	FR 2026-19697	337	DDR5 DRAM instituted (337-TA-1523, Netlist v. Micron et al.)
09-27	White House	**301**	Board of Trade 30-FOR-30 two-way tariff-relief framework and product lists (added)
09-28	FR 2026-19713	337	Powered recliner mechanisms instituted (337-TA-1524; four mainland China respondents incl. Henglin; added)
09-29	Effective date	**232**	Pharma 232 general tier of 20% starts applying (100% from 2030-04-02; added)
09-29	FR 2026-19924	Procedural	CBP approves Intertek USA (Carteret, NJ) as gauger/laboratory (added)
09-29	FR 2026-19925	Procedural	CBP approves Intertek USA (Chelsea, MA) as gauger/laboratory (added)

Date	Notice	Type	One-liner
09-29	FR 2026-19926	Procedural	CBP approves Laboratory Services (Kemah, TX) as gauger/laboratory (added)