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# December 2025 newsletter



## Taxing Imports: Tracing the Role of Tariffs in U.S. Economic Policy

By [Adrienne Braumiller](#), Managing Partner

In the Chinese zodiac calendar, 2025 is the year of the snake. The snake is said to represent wisdom and strategy. As it occasionally sheds its skin, it is also said to represent a change or an inflection point. Whether American trade policy in the year of the snake exemplifies wisdom and strategy depends on one's political perspective. Whether it exemplifies a major transformation and inflection point is unquestionable.

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## **Section 232 Steel & Aluminum Derivative Products Inclusion Process Expands Scope of the National Security Purpose of Section 232 Investigations**

**By Paul Fudacz, Partner, Braumiller Law Group**



On February 10, 2025, the President issued Presidential Proclamations Under Section 232 of the U.S. Code adjusting imports of steel and aluminum into the United States. These Proclamations provided an expanded listing of steel and aluminum derivative articles but also instructed the Secretary of Commerce (Secretary) to establish a process for including additional derivative aluminum and steel articles within the scope of the ad valorem duties.

The Secretary, through BIS, established the Section 232 Inclusions Process effective April 30, 2025, and began accepting inclusion requests under the first submission cycle May 1, 2025.

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## **Tariffs, Deals, Steel, Aluminum and AI - Oh My! Welcome to the New Normal**

**By Bruce Leeds, Senior Counsel Braumiller Law Group**

The way it used to be:

- New tariffs and trade measures were announced in the Federal Register and went through a rulemaking process before becoming effective. This gave importers and customs brokers time to plan for the change.
- The customs compliance function in a company – if there was one – was not well known or appreciated by management.
- Customs duties were at reasonable levels and viewed as a cost of doing business.
- Doing research on a tariff classification could be a tedious process.

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## **The Automotive Industry, China's Semi Grip on Supply Chains, and General Motors 2027 Exit Strategy for Suppliers (Is a clean break even**

**possible?)**

**By Bob Brewer, Braumiller Law Group**

General Motors (GM) has instructed thousands of its suppliers to phase out sourcing parts and materials from China by 2027. The exit strategy began in early 2024, with the directive gaining momentum in spring of this year, 2025. This directive is part of GM’s broader strategy to enhance supply chain resiliency and reduce exposure to geopolitical risks, particularly amid escalating, or let’s just say, continuously fluctuating, U.S.–China trade tensions. The company is encouraging suppliers to find alternative sources, preferably within North America, though it remains open to non-Chinese international suppliers that meet regulatory and logistical standards.



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**BIS “Affiliates Rule” Suspended One Year, But No Time to Rest**

**By Megan Mohler, Senior Associate Attorney, Braumiller Law Group**

On November 10, 2025, the U.S. Bureau of Industry and Security (“BIS”) delayed the effective date of its new Affiliates Rule for a one-year period, until November 9, 2026, after U.S. and China trade talks.

The Affiliates Rule, announced on September 29, 2025, expands export controls under the Export Administration Regulations (“EAR”) to extend to non-listed “affiliates” owned or controlled by listed entities (on the Entity List, the Military End User List “MEU”, or certain sanctioned parties) 50% or more in the aggregate.

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**New Value Manifest/Manifestacion de Valor - via VUCEM**

**By Brenda Cordova, Braumiller Law Group Mexico Legal Counsel**

**Introduction**

Beginning December 9, 2025, importers in Mexico will be required to complete and submit the Electronic Value Manifest through VUCEM (Mexico's Electronic Single Window). This measure increases the importer's direct participation and responsibility in determining and declaring the correct customs value of imported goods.



### **What is the Value Manifest?**

The Value Manifest is an official format established by the Tax Administration Service that must be completed and signed under oath by the Mexican importer. It includes all elements necessary to determine the correct customs value of the goods, such as:

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### **Activating HTTP 402: The x402 Protocol and Legal Framework for Internet-Native Stablecoin Payments**

By **James Holbein**, Of Counsel, and **Justin Holbein**, Web3 Developer and Consultant

#### **Introduction**

When Tim Berners-Lee and his team at CERN formalized the Hypertext Transfer Protocol in the early 1990s, they reserved HTTP status code 402 with the designation "Payment Required." The 1996 HTTP/1.0 specification (RFC 1945) explicitly noted the code's purpose for "some form of digital cash or micropayment scheme," yet candidly acknowledged "that has not happened, and this code is not usually used." For three decades, HTTP 402 remained dormant, a placeholder waiting for payment technology that could finally enable the internet's native commerce vision.

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### **New Mexican Customs Law – Nueva Ley Aduanera de Mexico**

By **Brenda Cordova**, Braumiller Law Group Mexico Legal Counsel

#### **Introduction**

On November 19, 2025, a Decree amending, adding and repealing various legal provisions of the Mexican Customs law was published in the *Diario Oficial de la Federacion* (Mexican Official Gazette). This reform will enter into force on January 1, 2026.

Although the Customs Law has been amended multiple times in the last 30 years, this reform is widely considered the most significant since December 15, 1995.



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**President Trump Cuts Certain Reciprocal Tariffs on Agricultural Products**

By **[Brandon French](#)**, Senior Associate, Braumiller Law Group

On November 14, 2025, President Trump issued an Executive Order exempting certain agricultural products from the reciprocal tariffs (<https://www.whitehouse.gov/presidential-actions/2025/11/modifying-the-scope-of-the-reciprocal-tariff-with-respect-to-certain-agricultural-products/>). President Trump indicated that:

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**Critical Minerals Focus of White House Trade Agreements in 2025**

By **[James R. Holbein](#)**, Counsel to Braumiller Law Group PLLC

**Introduction**

The Trump Administration is pursuing a new style of trade management based on use of tariffs to rectify trade deficits and to set new “reciprocal” tariff rates to level the playing field for all of its trading partners. Critical minerals are a key component of the strategy, because the U.S. is heavily



dependent of foreign sources for most of the critical minerals used in modern manufacturing. In response to Trump-imposed tariffs and threats of other trade actions, China has repeatedly used export controls on rare earths and other critical minerals as leverage.

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**Developing a Tequila Brand for Export from Mexico**

By **[Brenda Cordova](#)**, Braumiller Law Group Mexico Legal Counsel, with guest collaborator and tequila law expert **[Leonardo Gómez](#)**

**Introduction**

The development of a tequila brand begins with a foundational step: registering a trademark in Mexico, the United States, or any other intended markets. However, trademark protection is only the starting point. Building a tequila brand requires a broader business and regulatory strategy involving multiple teams—customs and trade, finance, marketing, and legal—to plan for production, cost structures, distribution, sales, and export-related compliance.

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**BRICS and the Drive Towards De-Dollarization. Has it stalled?**

By **[Victoria Holmes](#)**, Braumiller Law Group

Could BRICS break the dollar's grip? The answer is coming into sharper focus, and it's more complicated than either the optimists or skeptics predicted. Since our previous analysis, BRICS has made concrete moves toward de-dollarization while simultaneously confronting harsh economic and political realities. The gap between ambition and achievement has never been clearer.



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### **THIRTEENTH ANNUAL (virtual only)**

**“Partnering for Compliance<sup>™</sup>” Customs/Import Boot Camp 2026**  
**With Braumiller Law Group speakers Adrienne Braumiller, Managing Partner,**  
**and Senior Counsel Bruce Leeds**

**Thursday, January 22<sup>nd</sup>, 2026**

**An official Certificate of Completion outlining 7 credit(s) for CCS/MCS, LCB credit type(s) through NCBFAA will be awarded**

**Information & registration:** <https://www.partneringforcompliance.org/pfcimp26.pdf>



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