

THE CARMICHAEL COMPASS

"WHEN THE TIDES OF TRADE SHIFT, WE'RE YOUR COMPASS."

Issue 25-035 * August 13, 2025

Carmichael Welcomes Thayne Worsley as Director of Trade Solutions

As we continue to navigate the ever-evolving landscape of global trade, we recognize the need to stay ahead of the curve, not only to serve our clients better but to position Carmichael as a leader in consulting and advisory services. In line with this vision, I'm excited to announce a new leadership role that reflects our future: Director of Trade Solutions.

Please join me in welcoming Thayne Worsley to this key position.

Thayne brings nearly 30 years of deep expertise in customs compliance, export controls, and international freight logistics. He is a Licensed Customs Broker, a Certified Customs Specialist, and co-chairs the NEI Committee for the National Customs Brokers & Forwarders Association of America (NCBFAA). He has formerly held various leadership roles in trade associations and continues to serve on committees and working groups of trade associations and government agencies.

He holds a Bachelor of Arts in Political Science from the University of Utah. He is currently pursuing a Master of Jurisprudence from Widener University Delaware Law School.

Before joining Carmichael, Thayne was the Managing Director of FedEx Trade Solutions, where he led advisory and consulting services for global clients. Before that, he served as Vice President of Trade Regulation Compliance at Panalpina, Inc., and held leadership roles at DHL Global Forwarding and Exel Global Logistics. He has extensive experience collaborating with U.S. and international regulatory agencies and has successfully built compliance programs that deliver both operational excellence and commercial value.

Please join me in welcoming Thayne to the Carmichael team!

The President has Extended the Pause on China Duties

President Trump has issued an Executive Order that extended the pause on reciprocal duties on China. The reciprocal duties for China will remain at 10% while negotiations continue. The pause will continue to be in effect until 12:01 am on November 10, 2025. The executive order can be found at: [Further Modifying Reciprocal Tariff Rates to Reflect Ongoing Discussions with The People's Republic of China – The White House](#)

Are You CTPAT?

If not, find out how to get certified!

CTPAT is open to members of the trade community who demonstrate excellence in supply chain security practices.

Click the links below to learn more and join CTPAT today!

[CTPAT Minimum Security Criteria](#)
[Customs Trade Partnership Against Terrorism](#)

Customs Broker License Test Will be on October 22, 2025

This fall's Customs Broker license test will be administered on October 22. Registration for the test opened on August 11 and registration will close on Wednesday September 10, 2025. Information about the application for the test and instructions on the test can be found on CBP's website at: [Customs Broker License Exam \(CBLE\) | U.S. Customs and Border Protection](#)



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Customs Guidance Released for the Additional Duties on Imports from Brazil

In the evening of Friday, August 1, Customs and Border Patrol sent out a [CSMS message](#) regarding the additional duties on imports from Brazil.

The CSMS message provides guidance to the Trade community for the filing of entries beginning on the effective date of August 6, 2025. Goods subject to the additional 40% duty will be entered under HTS number 9903.01.77. Exclusions are available for donations, informational materials, products listed in Annex I to the order, goods subject to Section 232, and goods that were in-transit.

Products admitted to a Foreign Trade Zone beginning August 6 must be admitted in 'Privileged Foreign Status' unless eligible for domestic status. Drawback is available, and the additional duties do not apply to entries under Chapter 98 except for products entered under 9802.00.80, 9802.00.40, 9802.00.50, and 9802.00.60.

Customs Guidance Released for the Reciprocal Tariff Updates Effective August 7, 2025

Late Monday, August 4, Customs and Border Patrol released their [CSMS message](#) regarding the Reciprocal Tariff updates effective August 7, 2025.

This guidance details entry instructions for the Trade community regarding the modified duties. It confirms that the in-transit exception for goods loaded at the port of loading and in transit on the final mode of transport prior to 12:01 AM on August 7, 2025, and entered on or after August 7, 2025, but before October 5, 2025, will continue to be entered under 9903.01.25.

Furthermore, goods properly claimed under Chapter 98 are exempt from the additional duties of the updated Reciprocal Tariffs except for the following instances: Subchapter XIX 9819 for Africa Growth and Opportunity Act (AGOA), Subchapter XX 9820 for United States-Caribbean Basin Trade Partnership Act, Subchapter XXII 9822 for various other Free Trade Agreements (FTAs), and goods claimed under HTS numbers 9802.00.80, 9802.00.40, 9802.00.50, and 9802.00.60.

Exemptions continue to be available for goods from Canada and Mexico including USMCA eligible goods; goods under General Note 3(b) from Belarus, Cuba, North Korea, and Russia; Donations; Informational Materials; Articles of Annex II; Section 232 Applicable products of steel, aluminum, automobiles, auto parts, and copper; and U.S. content.

Goods That Transship to Avoid Duties Face an Additional 40%

The [CSMS message](#) released the evening of August 4 by CBP once again confirms that goods suspected of evasion of duties by transshipping will be subject to an additional ad valorem duty of 40%. This duty is in addition to any other duties, fees, taxes, extractions, or charges applicable to goods of the country of origin.

If a positive determination is made, CBP will direct a correction of the entry and/or entry summary to replace the IEEPA Reciprocal Tariff number used with HTS heading 9903.02.01 or they will act upon liquidation to collect the 40% applicable duties.

It is still not clear what exactly constitutes transshipment for the purpose of these additional duties.

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