



CIAA BULLETIN

Bulletin 26-39 September 17, 2026



Exclusive Member Update

Update: Cheese Now Subject to Section 338 Additional Duties on Canada

On September 8, 2026, President Trump issued five **Proclamations** imposing new import bans on certain Canadian products and modifying the scope of Canadian-origin goods subject to the additional 50% *ad valorem* duties imposed under Section 338 of the Tariff Act of 1930 ("Section 338"). The President's actions restricting Canadian imports followed Canada's **imposition** of retaliatory tariffs of 15%, 25%, and 50% on U.S. goods in several sectors including steel, dairy, appliances, agricultural equipment, pulp and paper, and electronics, effective September 8, 2026.

Specifically, Proclamation **11064** (Sept. 8, 2026) **added** 23 tariff classifications specific to cheese (Heading 0406 of the Harmonized Tariff

Schedule of the United States (“HTSUS”)) to the list of Canadian-origin goods subject to the additional 50% Section 338 duties. The change applies to goods entered for consumption, or withdrawn from warehouse for consumption, on or after 12:01 a.m. Eastern Time on September 15, 2026.

The cheese classifications added by Proclamation 11064 cover several categories, including: fresh cheese and cheese substitutes; grated or powdered cheddar, Romano, Reggiano, Parmesan, Provolone, Provoletti, Sbrinz, and Goya cheeses; processed cheese, including certain mixtures; Roquefort and other blue-veined cheeses; cheddar, Edam, Gouda, Swiss, Emmentaler, Romano, Reggiano, Parmesan, Provolone, and Provoletti cheeses; certain sheep’s-milk cheeses; and other cheeses and cheese substitutes, including mixtures made with cow’s milk. Depending on the particular tariff classification, they also apply to both in-quota and over-quota goods.

U.S. Customs and Border Protection (“CBP”) confirmed the change in **CSMS #6985191** , issued September 11, 2026.

Members should compare the specific Heading 0406 provisions identified in Proclamation 11064 to the tariff classifications applicable to their imports in order to determine whether the additional 50% Section 338 duty applies to their goods.



Important Dates to Remember

OCTOBER 1, 2026 (no exceptions)

Last transmission date for licensees to surrender all or the unused portion of their calendar year 2026 licenses.

OCTOBER 15, 2026 (no exceptions)

Last transmission date for all applications for calendar year 2027 licenses.

OCTOBER 31, 2026

Exporting countries that are designating U.S. importers for calendar year 2027 must submit their designations to FAS by this date.

DECEMBER 20, 2026 (approximately)

FAS issues first notice of calendar year 2027 licenses to licensees.

OCTOBER 17-22, 2026

SIAL

CIAA's exclusive week-long trip to the 2026 SIAL Show in Paris – the largest food exhibition in the world.

DECEMBER 31, 2026

Last day for licensees to make entries to fulfill the requirement to use 85% of their calendar year license amount. Last day for which calendar year 2026 licenses are valid.

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