

April 7, 2026

**New Section 232 Tariffs on Pharmaceuticals**

Dear Customer,

The U.S. Government has issued a new [proclamation under Section 232](#) introducing tariffs on patented pharmaceuticals and certain associated pharmaceutical ingredients, citing national security concerns related to reliance on foreign production. These tariffs represent an expansion of Section 232 to the life sciences sector with immediate implications for sourcing, pricing, and compliance. This action takes effect on July 31, 2026, for companies identified in [Annex III](#), and on September 29, 2026, for all remaining companies.

The action applies to patented pharmaceuticals and associated pharmaceutical ingredients, including active pharmaceutical ingredients (APIs) and key starting materials. Generic pharmaceuticals and biosimilars are excluded at this time.

The tariff framework is tiered and may range from 0% to 100%, depending on product characteristics, country of origin, and whether the importer qualifies for specific agreements or onshoring incentives. Section 232 pharmaceutical tariffs are structured so that the total duty payable equals the applicable rate specified in the proclamation. Where a product may qualify under more than one tariff level or preference, the lowest applicable rate will apply.

What this means for your supply chain planning and our recommendations

- Identify impacted products under [Annex I](#)
- Determine whether products qualify as patented vs. generic
- Evaluate eligibility for:
  - Reduced rates tied to approved onshoring plans
  - Zero tariff categories for critical, specialty, or U.S. origin products
- Assess supply chain restructuring opportunities
- Review drawback applicability
- Monitor for CBP implementation guidance and Federal Register updates
- Assess Foreign Trade Zone (FTZ) implications, noting that covered products admitted to FTZs must enter under Privileged Foreign Status (PFS), with duty rates fixed at admission

The Maersk Trade Compliance and Consulting teams can assist with:

- Tariff exposure modeling and scenario analysis
- Product scope and classification validation
- Onshoring strategy and eligibility assessment
- Agreement readiness and documentation support
- Drawback analysis and recovery strategy
- Ongoing regulatory monitoring and implementation guidance

Further details and regulatory updates will be made available as guidance is issued. To discuss how these changes may impact your business and identify potential mitigation strategies, please contact our Trade Compliance and Consulting team at [compliance.mcsi.nam@maersk.com](mailto:compliance.mcsi.nam@maersk.com)

Sincerely,  
Maersk