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Trade Lines

Policy Intelligence for Global Business Leaders

*Published by Blake Harden and Evan Giesemann
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Welcome to Trade Lines, your view from DC on the evolving landscape of international trade and regulatory policy. Curated for business leaders and decision-makers, this newsletter delivers timely insights into the issues shaping global commerce—from tariff shifts and supply chain disruptions to legislative developments and compliance trends. Our goal is to help you anticipate change, assess impact, and act with confidence in a fast-moving policy environment.

Global Signals

Pause on European tariffs amid Greenland talks

After a meeting with the Secretary General of NATO in Davos, President Trump reported that a framework deal has been reached regarding US involvement in Greenland and that there is no longer a need to impose new tariffs on trading partners. The President had threatened new and escalating tariffs beginning on February 1, although the administration had not yet issued an Executive Order making any new tariff prospects official.

President Trump [posted](#) January 21 on Truth Social that “Based upon a very productive meeting that I have had with the Secretary General of NATO, Mark Rutte, we have formed the framework of a future deal with respect to Greenland.” In his post, Trump said that on this basis “I will not be imposing the Tariffs that were scheduled to go into effect February 1st” and that “further information will be made available as discussions progress. Vice President JD Vance, Secretary of State Marco Rubio, Special Envoy Steve Witkoff, and various others, as needed, will be responsible for the negotiations – They will report directly to me.”

Earlier on the same day, European Parliament International Trade Committee Chair Bernd Lange raised questions about the continued enactment of the US-EU trade framework, saying in a [statement](#), “Given the continued and escalating threats, including tariff threats, against Greenland and Denmark, and their European allies, we have been left with no alternative but to suspend work on the two Turnberry legislative proposals until the U.S. decides to re-engage on a path of cooperation rather than confrontation, and before any further steps are taken.” Following Trump’s withdrawal of the tariff threat, European Parliament President Roberta Metsola told reporters that the EU would proceed with consideration of the trade deal.

Trump hints at IEEPA 'licenses'

While the Trump administration awaits a Supreme Court decision on whether the International Emergency Economic Powers Act (IEEPA) authorizes the president to impose tariffs, Trump hinted at the possibility of regulating imports through licenses. At a White House briefing on January 20, Trump said "I don't know what the Supreme Court is going to do," but that the law "reads so plainly - couldn't be plainer. You are allowed to do a license."

This is the at least the second instance of Trump raising the idea of licenses. Earlier this month, he told New York Times reporters that IEEPA gives him "the right to license."

Under IEEPA, the president can regulate imports "by means of instructions, licenses, or otherwise." This came up during the Supreme Court oral argument, with multiple justices asking questions to better understand how licenses are treated under IEEPA and whether and how licensing fees and tariffs might be similar or different. While it's too early to speculate exactly what the administration might be considering, this could take a variety of forms for importers, including potentially new paperwork and certification obligations; agency-specific licensing portals or case-by-case approval processes; or perhaps even temporary suspension or denials of imports.

Policy Pulse

Commerce invites comments on Section 232 inclusions requests for automobile and automobile parts

On January 15, the Commerce Department [posted for public comment](#) new inclusions requests for automobile parts received during the January 2026 submission window. Commerce received 11 requests from 3 companies to include hydraulics, thermostats, and compressor-related products.

According to the [Interim Final Rule](#) establishing the inclusions process for automobile and automobile parts, the posting of these inclusion requests starts a 60-day timeline for Commerce to consider the requests and assess "(1) whether the described product at the eight- or ten-digit HTSUS classification is an automobile parts article; and (2) whether imports of such automobile parts articles have increased in a manner that threatens to impair the national security or otherwise undermines the objectives set forth in Proclamation 9888, the Automobile Proclamation, or any subsequent proclamation addressing the threatened impairment to the national security."

Stakeholders have until 11:59 PM ET on January 29 to comment on whether Commerce should add these products to the section 232 tariff list as products that threaten to impair national security. Based on the process established in the Interim Final Rule, Commerce should issue a decision on these inclusion requests by March 16.

USTR urged to initiate Section 301 investigation into Korean e-commerce

Certain U.S. companies are planning to file a petition to the Office of the U.S. Trade Representative (USTR) requesting a Section 301 investigation into a Korean e-commerce dispute. According to reports, the companies will argue that U.S.-Korea bilateral trade commitments are being violated by Korean regulators' response to a data breach in 2025, which included parliamentary hearings and government probes into the breach. Further reporting indicates that the petition will argue that the response was not in line with how Korean authorities have responded to comparable domestic breaches and is hence discriminatory treatment of U.S. business. After the petition is filed, USTR will have to decide whether to launch a 301 investigation within 45 days. Such an investigation could create setbacks for US-Korea trade talks.

During last week's digital trade hearing at the House Ways and Means Committee, several lawmakers raised bipartisan concerns with South Korea's actions to tighten its regulation of large online platforms. The Chairman of the Trade Subcommittee Adrian Smith (R-NE) said during the hearing that "it's my observation that Korea continues to pursue legislative efforts explicitly targeting U.S. companies." Rep. Suzan DelBene (D-Wash.) said during the hearing: "I'm hearing from companies in my home state of Washington [...] that [Korean] regulators are already violating [the trade deal] commitments."

New trade measures on semiconductors and critical minerals

On January 14, President Trump signed two proclamations under Section 232 authority imposing new trade measures on semiconductors and related equipment and directing negotiations with trading partners on both semiconductors and critical minerals. The action follows Commerce Department findings in both investigations that U.S. reliance on imports of semiconductors and critical minerals pose a national security risk.

Related to semiconductors, the President has imposed a 25 percent tariff on select advanced semiconductors (e.g., chips for AI and high-performance computing) unless imports directly support U.S. technology buildout. The tariff took effect on January 15. The President also directed the U.S. Trade Representative (USTR) to negotiate agreements with trading partners to address national security concerns. Regarding critical minerals, the President decided not to impose tariffs at this time. He has directed the USTR to negotiate agreements with trading partners to address national security concerns. If those negotiations fail after 180 days, he may impose trade restrictions.

CBP launches forced labor portal

U.S. Customs and Border Protection (CBP) has now launched its Forced Labor Portal where importers can submit review requests for shipments detained or excluded for forced labor enforcement. Effective January 21, the following are mandatory submissions for review:

- Withhold Release Order/Finding admissibility reviews.
- Uyghur Forced Labor Prevention Act applicability reviews.

- Uyghur Forced Labor Prevention Act requests for exception; and
- Countering America's Adversaries Through Sanctions Act exception requests.

The portal is available [here](#).

CBP modifies palm-oil related Withhold Release Order

On January 15, CBP [announced](#) that it had modified the Withhold Release Order (WRO) issued on September 30, 2020, "against palm oil and palm oil products produced in Malaysia by FGV Holdings Berhard, its subsidiaries and joint ventures (collectively known as FGV)." According to the CBP release, "[t]he company has made the corrections we required." As a result, effective January 15, CBP "will no longer detain at ports of entry palm oil and palm oil products produced by FGV."

Hill Highlights

One-year AGOA extension included in appropriations package

On January 22, the Consolidated Appropriations [Act](#) of 2026 to fund defense, labor, health and human services, education, and transportation, housing and urban development agencies through the 2026 fiscal year passed the House by a vote of 341-88. Included in these spending bills is an extension of the *African Growth and Opportunity Act* (AGOA) and the *Haiti Economic Lift Program* through December 2026. The extensions are retroactive to the programs' expiration on September 30, 2025.

A reminder that on January 13, House lawmakers passed the *AGOA Extension Act* ([H.R.6500](#)) by a 340-54 vote and passed the *Haiti Economic Lift Program Extension Act* ([H.R.6504](#)) by a 345-45 vote. Those bills would extend AGOA and Haiti HOPE/HELP through 2028.

Upcoming Deadlines

January 26: Commerce deadline to issue a report to the President in its section 232 investigation into commercial aircraft and jet engines.

January 28: Written comments and requests to testify due to USTR concerning the 2026 Special 301 Review.

January 29: Written comments concerning new section 232 automobile and automobile parts inclusion requests due to the Commerce Department.

February 18: USTR will hold a public hearing in its 2026 Special 301 Review.

February 25: Post-hearing written comments due to USTR in its 2026 Special 301 Review.

March 1: The President's 2026 Trade Agenda is due to Congress.

March 27: Deadline for President to decide whether to act in the section 232 investigation concerning pharmaceuticals and pharmaceutical ingredients.

March 28: Commerce Department to send the President its findings on its section 232 investigations into drones and polysilicon and derivative products by this date.

March 31: U.S. and Switzerland to finalize their trade agreement by this date.

If you have questions, please contact Blake Harden (blake.harden@ey.com) or Evan Giesemann (evan.giesemann@ey.com).

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