

KREAB Brief for UCAB

EU Response Measures to Trump Administration Decision to raise tariffs for imports of steel, aluminium

March 12, 2025

As background information, on March 12, 2025 the US introduced an earlier announced decision to impose a 25% import tariff on steel, aluminium and certain products containing steel and aluminium from the EU and other trading partners.

In response to the US tariffs, which the EU regrets and considers unjustified and harmful, **the Commission announced it will launch “swift and proportionate” countermeasures on US imports** into the EU.

The Commission response will be based on a **two-step approach** applied in total to EUR 26 billion worth of US goods exports into the European market. This amount matches the impact of the US tariffs which also affect a total of EUR 26 billion of EU exports to the US.

Two-step approach:

- ***Automatic reimposition of suspended rebalancing measures:*** First, on 1 April, the Commission will let the suspension of existing rebalancing measures against the US which date from 2018 and 2020 lapse automatically. These measures were put in place when the US imposed so-called “Section 232” tariffs on EU steel imports (25%) and EU aluminium imports (10%) during the first Trump Administration. In total, the EU rebalancing measures covered EUR 8 billion of US goods exports. The measures consisted of two parts of which only the first part was applied. The second part was prepared but never applied. Following a deal with the US, the application of both parts was **suspended** by the Commission in 2021 during the Biden Administration and replaced with a tariff-based quota system for EU exporters. As of 1 April, both parts of the existing EU rebalancing measures will not be suspended further and for the first time the two parts will be implemented in full.
- ***Commission to impose additional countermeasures:*** Second, by mid-April (likely 13 April), the Commission will put forward an additional package of

countermeasures on EUR 18 billion of US goods exports into the EU. The additional measures are needed to increase the total value of the EU measures so they match the value of trade impacted by the US tariffs (i.e.: EUR 26 billion). The Commission will flesh out these measures under the EU Trade [Enforcement Regulation](#) as it considers the US measures as a disguised safeguard measure.

- Stakeholder consultation: The Commission will hold a two-week consultation with EU Member States and stakeholders among affected European industries. The Commission [calls](#) on stakeholders to submit their views, identifying their commercial interests to be affected either by the US measures or by the anticipated EU rebalancing measures, via a [questionnaire](#) by the deadline of 26 March. The consultation is intended to scope out EU sensitivities and pick the products that will be subject to the additional EU countermeasures while minimising disruption for EU business and consumers.
- Draft list of products: The Commission put forward a draft [list of products](#) from the US that could be subject to countermeasures (*see attached*). The products listed are a mix of **agriculture products** (ex.: **poultry**, beef, seafood, nuts, **eggs**, **dairy**, **sugar**, coffee, peppers, spices, beer, spirits, wine, fruit, vegetables, tobacco, ...) as well as industrial (ex.: steel, aluminium, textiles, leather, home appliances, house tools, plastics, wood, soap, windows, furniture, motorcycles, machinery, glasses, ...).

Meanwhile, the **EU stands ready to negotiate** a solution with the US at which time the measures can be reversed. Going forward, note that US President Trump also announced the imposition of “reciprocal” tariffs on 2 April which could further aggravate the situation.

Next steps:

- Now: Commission public consultation ongoing
- 26 March: Deadline of public consultations with the EU industries to be completed
- 1 April: EU suspension of rebalancing measures lapses
- 2 April: US to possibly impose “reciprocal” tariffs
- Mid-April (likely 13 April): Additional EU countermeasures to start

Note from KREAB team:

KREAB Brussels office Market Access team stands ready to advise UCAB to stay abreast of the developments around the EU response to the US tariff raises, in particular by:

- 1) Tracking the development and implementation of trade measures
- 2) Advising on communication with clients in the EU, shareholders and other stakeholders about how they will navigate these measures
- 3) Advising on submitting input to official stakeholder consultations by the Commission with EU industries affected by the US trade measures and expected EU rebalancing measures (relevant to European subsidiaries of UCAB members)