SANDLER, TRAVIS & ROSENBERG, P.A.
International Trade, Customs & Export Law

Trade, Policy & Election Update

SPESA Executive Conference
San Antonio, Texas
October 29, 2026

Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

DISCLAIMER

All materials contained in this presentation are protected by United States copyright law and may not be reproduced, distributed, transmitted, displayed, published or broadcast without the prior written approval of Sandler, Travis & Rosenberg, P.A. You may not alter or remove any trademark, copyright or other notice from copies of the content. **The materials contained in this presentation are provided for informational use only and should not be considered legal advice.** The hiring of a lawyer is an important decision that should not be based solely on presentation materials. Please contact us and we will send you free written information about our qualifications and experience.

ALL THE INFORMATION IN THIS PRESENTATION IS VALID ONLY AS OF OCTOBER 29, 2026. PLEASE CONTACT US FOR DETAILS ANYTIME THEREAFTER.

Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

Our Speaker



Edward Steiner

Managing Director, International Trade and Government Relations
Sandler, Travis & Rosenberg, P.A.

Phone: 202.730.4970
Email: esteiner@strtrade.com

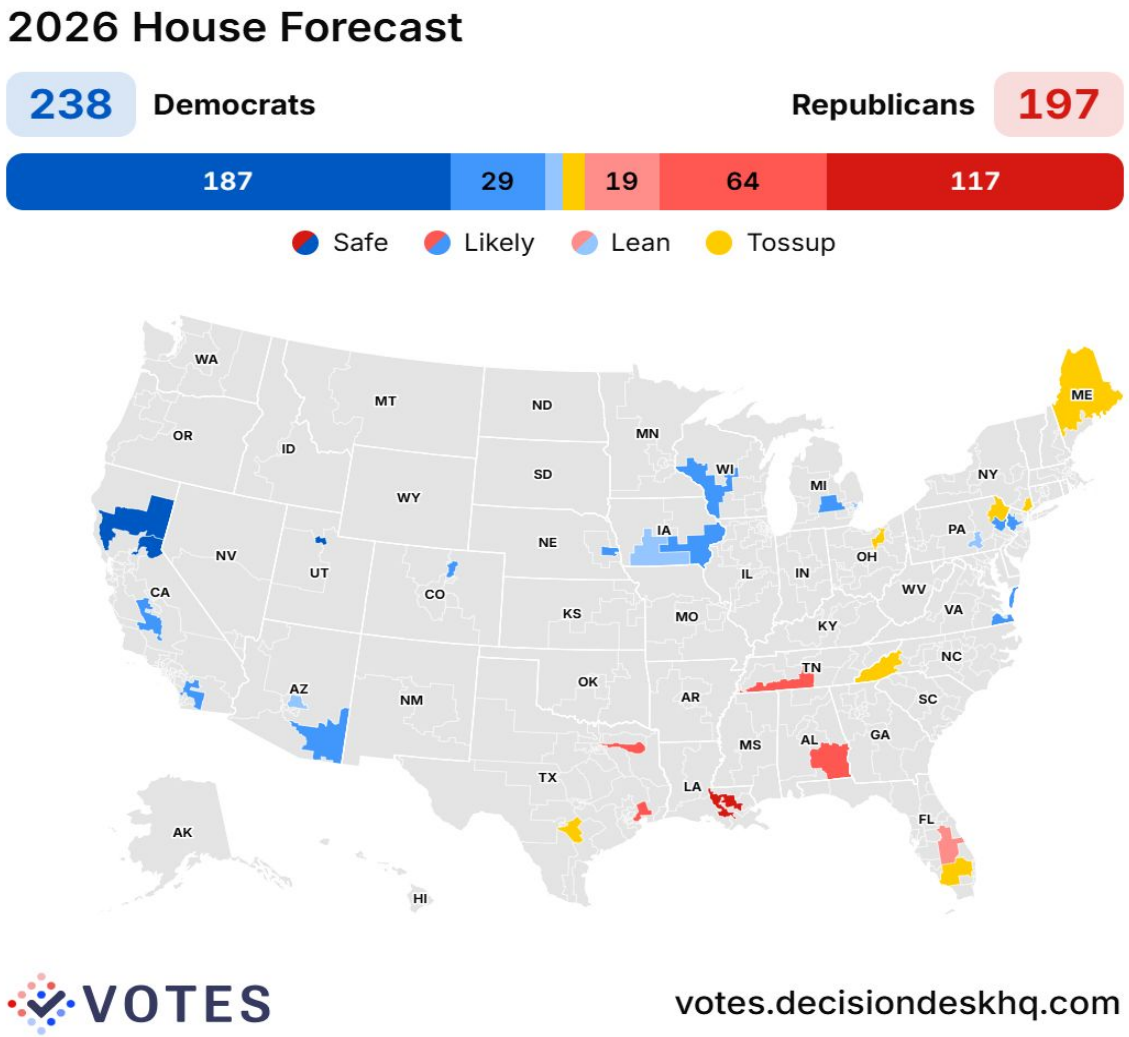
Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

OVERVIEW

- Midterm outlook: House, Senate and the races that decide control
- New Congress, New Trade Agenda?
- U.S.–China Trade Policy
- Trade Deals in the Hemisphere
- Openings for the Textile Machinery Industry
- Make your voice heard in Washington, prospects for 2027
- Q&A

Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

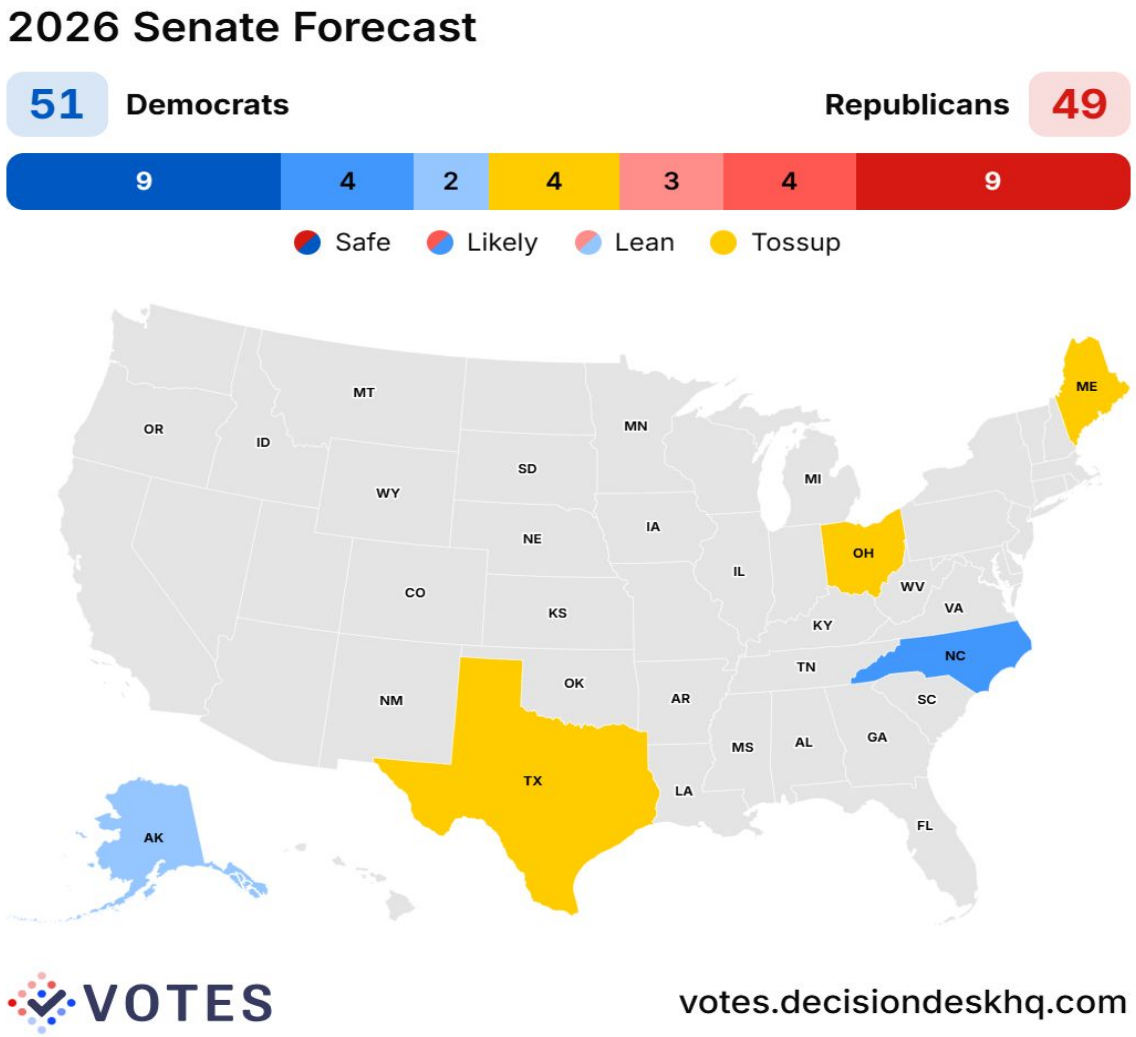
Midterm Outlook: House



Forecasted Flips

Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

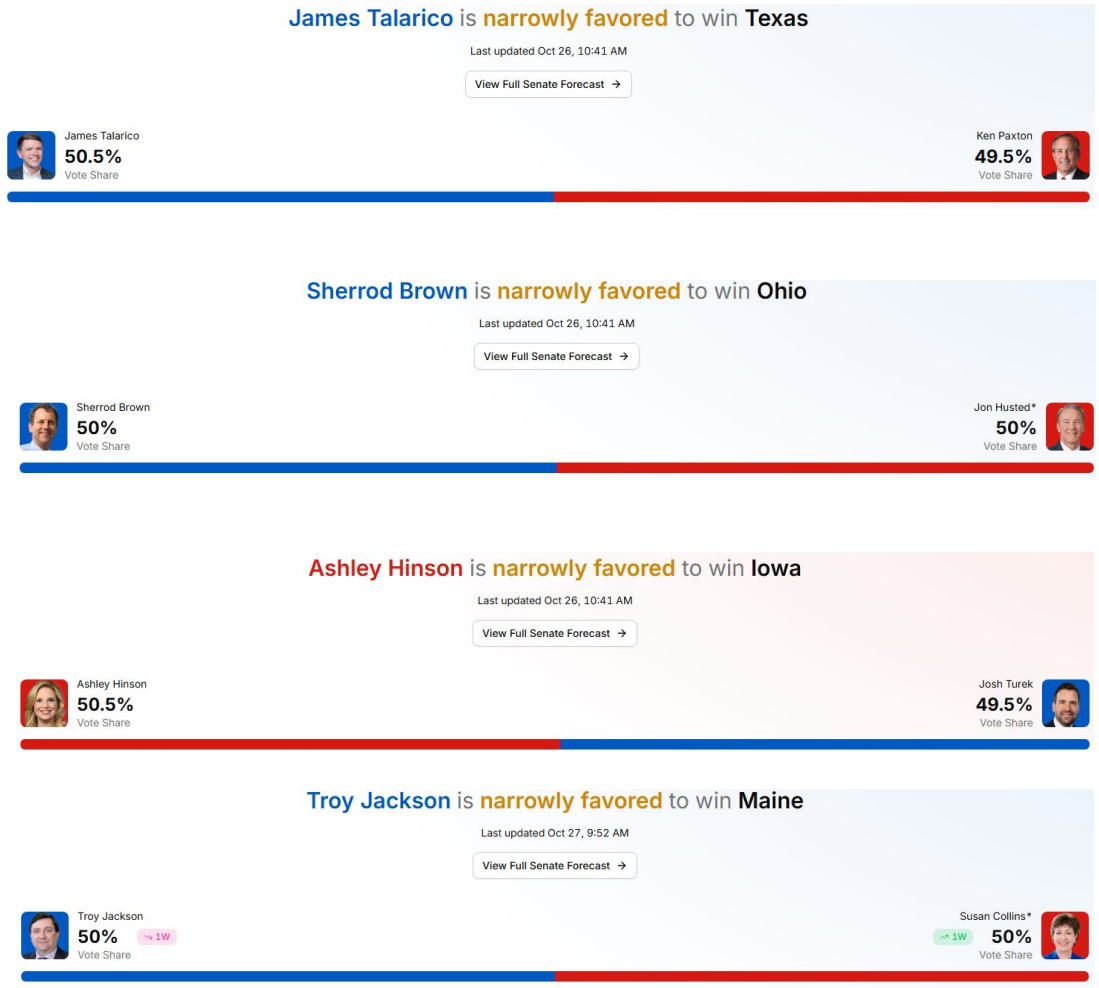
Midterm Outlook: Senate

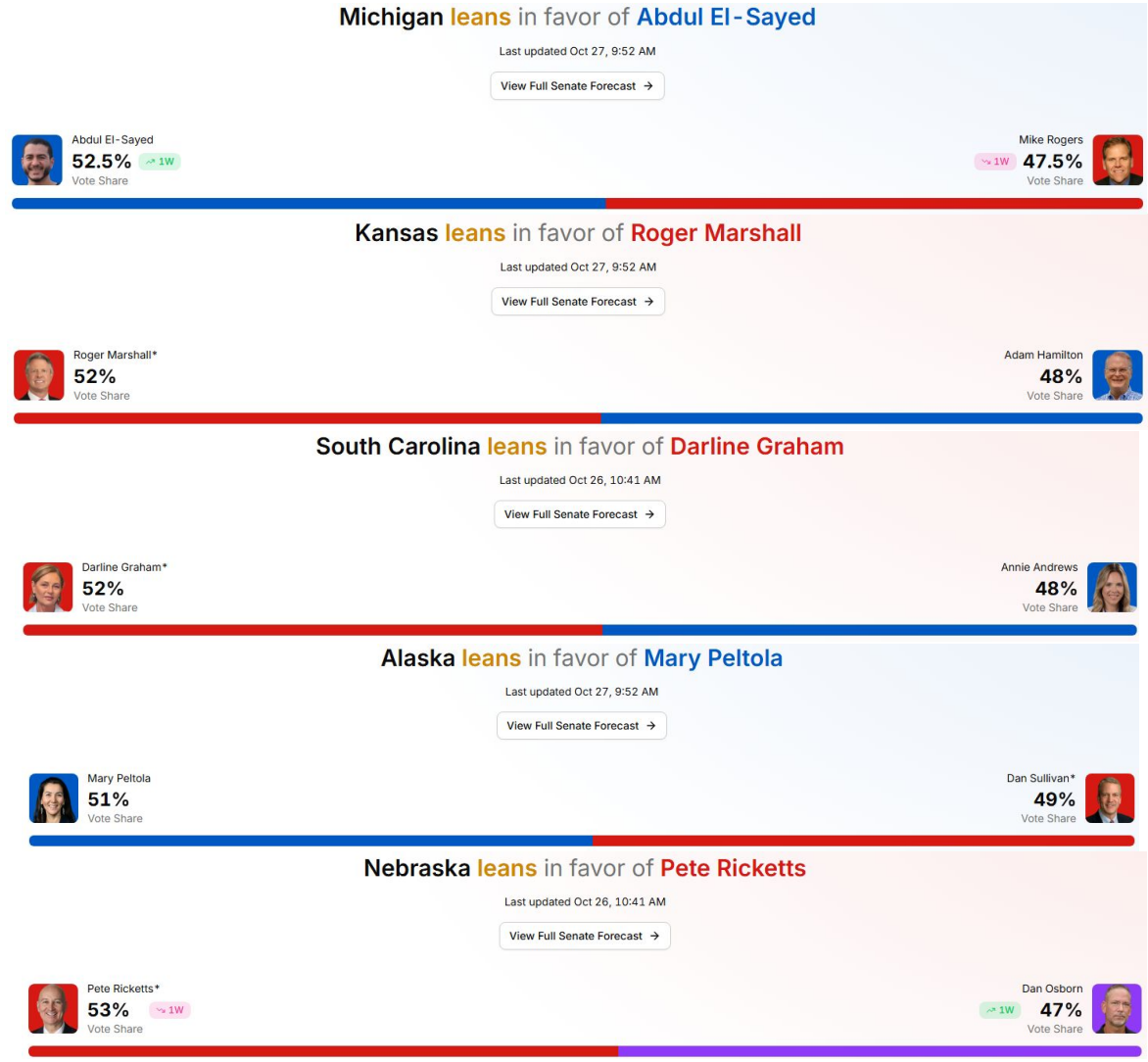


Forecasted Flips

Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

Midterm Outlook: Senate Toss-Ups and Leans





Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

New Congress, New Trade Agenda?

- **What is constant:** President acting under current tariff authority (e.g. Sections 232, 301, 338). Repealing or narrowing that authority woluld take a veto-proof majority. Could that be possible?
- **What changes:** Committee Chairs, hearing agenda, subpoenas, appropriations language, votes on disapproval resolutions, and leverage over must-pass bills and nominations (Senate)
- **Bipartisan openings:** Tariff-elimination/review legislation, trade preference renewals (GSP/Miscellaneous Tariff Bill)?

  *Both expired on December 31, 2020

Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

New Congress, New Trade Agenda?

General Tariff Authority

- Trade Review Act of 2025 (H.R.2665/S.1272)
  - Bipartisan bill
  - President must notify Congress within 48 hours of imposing or increasing a duty (except AD/CVD).
  - Notification must include (1) the rationale for imposing or increasing the duty, and (2) an assessment of the duty's potential impact on U.S. businesses and consumers.
  - **The bill limits the duration of a duty to 60 days, unless a joint resolution of approval is enacted into law.**

Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

New Congress, New Trade Agenda?

Sections 301/338/122

- End Trump's Tariff Tax Act (S.5390) – Charles Schumer (D-E)
  - Terminate Sec. 301 forced labor tariffs and repeal Section 122 and 338 and issue refunds

Section 338

- BAD DEAL Act (S.5397/H.R.10175) – Peter Welch (D-VT) and Brad Schneider (D-IL
  - Repeals Section 338 and refunds all duties paid

Section 232

- Congressional Trade Authority Act of 2025 (H.R.1903)
  - Requires congressional approval for Presidential action
  - Limits actions to goods related to the development, maintenance, or protection of military equipment, energy resources, or critical infrastructure essential to national security
  - Establishes requirements for an **exclusion process**
  - Applies retroactively to any proposed action taken up to six years before the enactment of the bill

Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

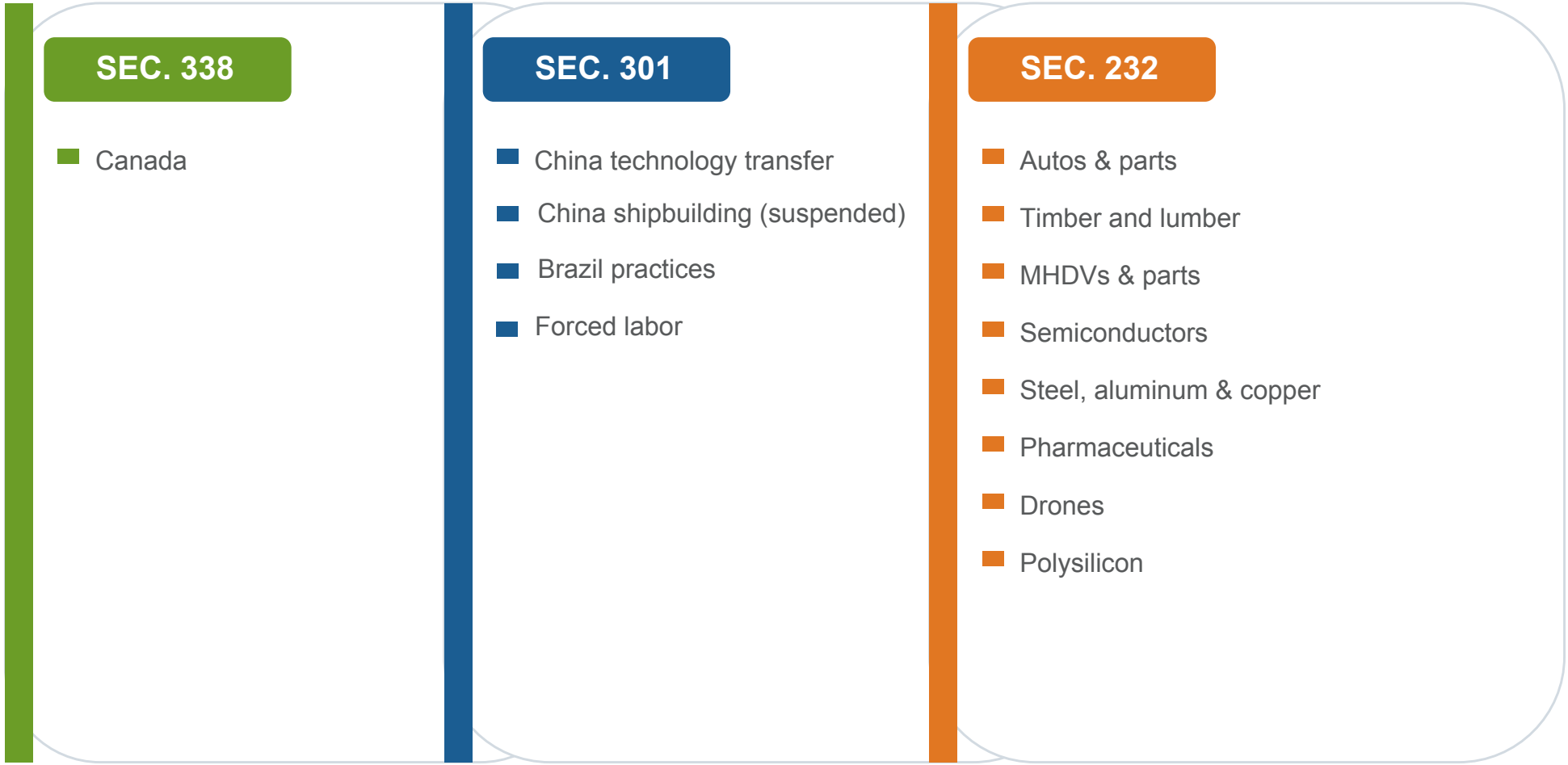
New Congress, New Trade Agenda?

Tariff Refunds (Sample)

Bill (Sample)	Member	Summary
RELIEF Act (H.R. 7736)	66 Democrats	**Require refunds** within 90 days of enactment for **all IEEPA tariffs** without the need for individual applications or protests
Illegal Tariff Refund Act (H.R.7636)	Three Democrats	Creates an "**individual tariff refund credit**" that would return money directly to American households
The American Consumer Tariff Rebate Act (H.R. 7865)	Rep. Henry Cuellar (TX-28)	Provide **direct refunds to taxpayers** for increased consumer costs attributable to **IEEPA** tariffs
Speedy Tariff Refund Act of 2026 (S.4364)	Sen. Wyden (D-OR) and four Democrats	**Automatic refund** of **all IEEPA tariffs** without requesting additional documentation
Tariff Refund Act of 2026 (S.3905)	Sen. Wyden (D-OR) and 26 Democrats	**Refund all IEEPA tariffs** including finally liquidated
Stop Global Tariffs Act (H.R.8228)	Jimmy Panetta (D-CA), Linda Sánchez (D-CA), and Don Bacon (R-NE)	**Strikes down Section 122** global 10% tariffs and **requires refunds** to all importers
Reclaim Trade Powers Act (H.R.2459/S.4049)	22 Dems (House) and 17 Dems (Senate)	**Repeal Section 122**

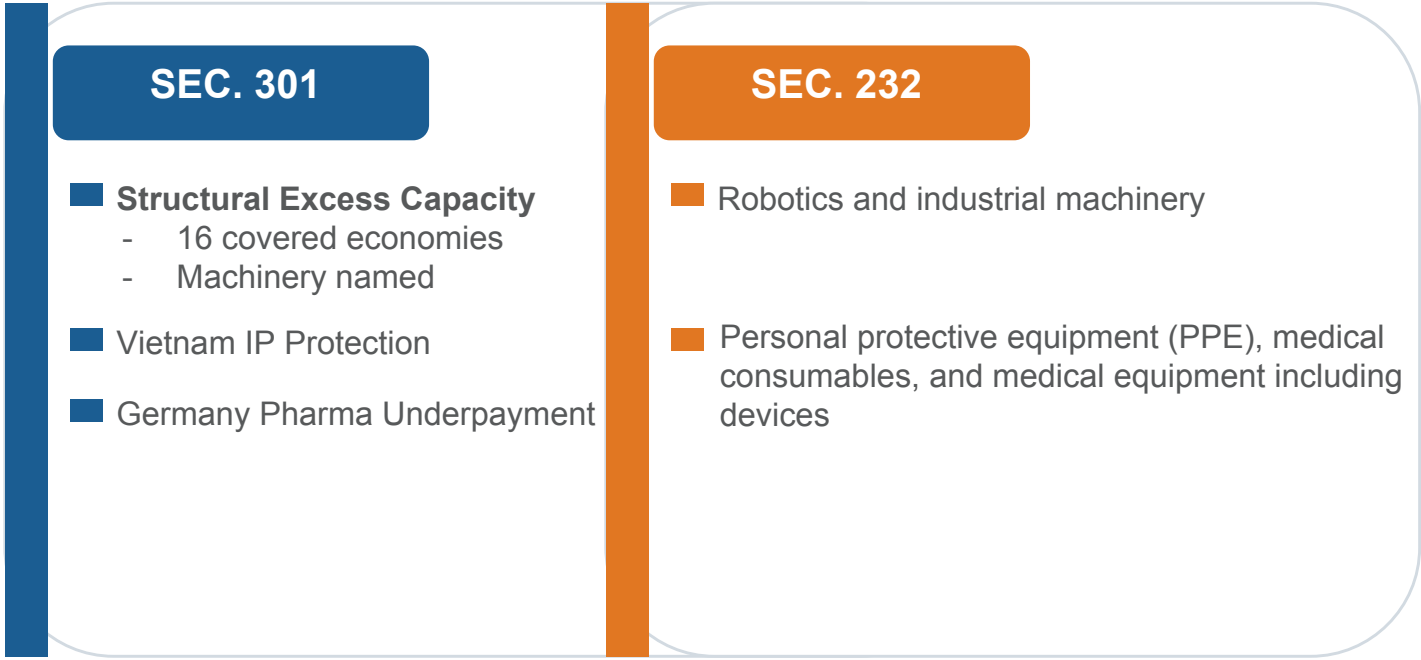
Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

Active Tariff Actions



Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

Pending Tariff Actions



Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

U.S.–China

- **Trump-Xi Summit**
  - **U.S.-China Board of Trade**
    - "$30b for $30b"
    - Mutual tariff reduction wish list
    - Includes **certain home textiles and sewn products** (blankets, bed and table linens, curtains and drapes, wall hangings, furnishing articles, pillow covers, sleeping bags, pillows, cushions)
  - **Trade Truce: "Busan Agreement" extended until Jan 10, 2027**
    - Sec. 301 shipbuilding action: officially postponed
    - Sec. 301 tariff exclusions: no official notice yet



Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

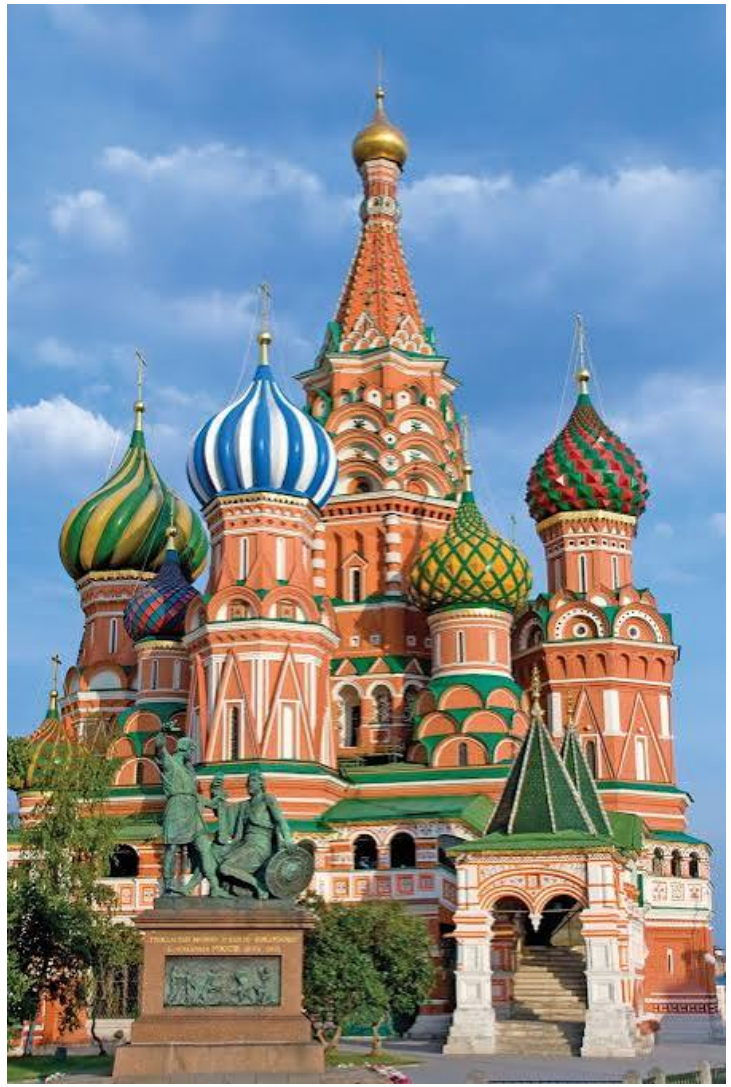
U.S.–Russia/China/India

Lindsay O. Graham Sanctioning Russia and Iran Act of 2026

Tariffs on Russia and purchasers of Russian Oil (e.g. China and India).

September 18, 2026: President Trump signs

October 16, 2026: President Trump **waives** imposition of all tariffs



Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

Trade deals in the Hemisphere

- USMCA Six-Year Review
  - U.S. did not agree to extend in current form annual review phase
  - Three official rounds with Mexico; none with Canada
- Central America/Western Hemisphere
  - Reciprocal Trade Agreements with El Salvador, Guatemala, Argentina, and Ecuador
  - Lower tariff rate (10%) and special exemption annexes under Section 301 Forced Labor tariffs



Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

Openings for the Textile Machinery Industry



Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

The Section 232 Models: End Use

- Steel/Aluminum/Copper
  - Exemptions for parts used in motorcycle manufacturing
  - Lower tariff for products used in manufacturing of agricultural equipment, fixed industrial equipment, or mobile industrial equipment (e.g. forklifts)
  - Note 16(k):

*parts classifiable in the provisions of subdivision (c)(vi)–(viii) that are in chapters 84, 85, or 87 that **will be used exclusively in the manufacturing of** agricultural equipment or fixed industrial equipment in (c)(ix)-(x), or mobile industrial equipment in (c)(xi)*

CSMS # 68855869 - GUIDANCE: Further Adjusting the Tariff Regimes for Imports of Aluminum, Steel, and Copper Into the United States

Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

The Section 232 Models: Offsets

- Automobiles/MHDVs
  - Tariff Offset Program for manufacturers that assemble vehicles in the U.S. and for importers in their supply chain





Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

The Section 232 Models: Onshoring deals

SEC 232 Tariffs:

- Polysilicon: 15%
- Drones: 10-100%
- Pharma: 15-100%
- Tariff relief made available for companies committing to an onshoring plans (e.g., build, refurbish, or expand a facility)



Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

The 9817 Model

- HTSUS 9817.00.50 and 9817.00.60 provide special duty-free treatment for qualifying agricultural/horticultural machinery, equipment, and implements
- Merchandise must be intended and used for the qualifying agricultural/horticultural purpose
- Model could be extended to cover machinery and inputs imported exclusively for use in manufacturing in the United States
- End use must be documented within three years of importation.

9817.00.50	Machinery, equipment and implements to be used for agricultural or horticultural purposes
9817.00.60	Parts to be used in articles provided for in headings 8432, 8433, 8434 and 8436, whether or not such parts are principally used as parts of such articles and whether or not covered by a specific provision within the meaning of additional U.S. rule of interpretation 1(c)

Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

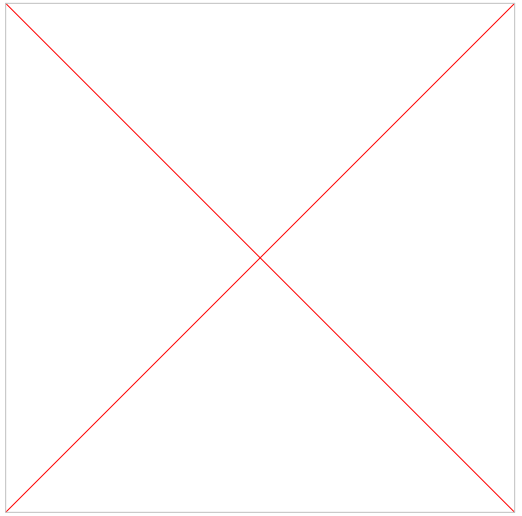
The NAM Model

- National Association of Manufacturers (NAM) “Speed Pass” proposal
- Calls on the Administration to:
  - Implement a general licensing system that grants pre-approvals for duty-free imports of inputs and materials necessary for manufacturing activities in the U.S.
  - Provide a rebate to offset tariff costs when dollars are spent to expand or maintain manufacturing investments in the U.S.

Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

Make Your Voice Heard in Washington

- Watch the calendar
  - Potential tariff actions (updates to existing actions, new investigations, tariff exclusions/inclusions, etc.)
  - Comment periods (USMCA, etc.)
- New Congress, new relationships
  - Lame-duck (Nov-Dec)□ new Congress (January 3)
  - New members, new committee chairs and new staff.



Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

Questions?



Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

Additional Resources

- To view our upcoming webinars, please visit: www.strtrade.com/training/events/upcoming-webinars

- To subscribe to ST&R Trade Report, please visit: www.strtrade.com/trade-news-resources/subscribe

- To listen to ST&R Two Minutes in Trade podcast, please visit: https://www.strtrade.com/trade-news-resources/str-trade-report/podcast

Thank you for attending!

Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.

Thank you!



Edward Steiner

Managing Director, International Trade and Government Relations

Sandler, Travis & Rosenberg, P.A.

Phone: 202.730.4970

Email: esteiner@strtrade.com

Copyright © Sandler, Travis & Rosenberg, P.A. | www.strtrade.com | All rights reserved.