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May 16, 2025

***VIA EMAIL***

Mr. Stephen Astle  
Director, Defense Industrial Base Division  
Office of Strategic Industries and Economic Security  
Bureau of Industry and Security  
U.S. Department of Commerce  
1401 Constitution Avenue, NW  
Washington, DC 20230

**RE: Comments on Section 232 National Security Investigation of Imports of Trucks (XRIN 0694-XC125)**

Dear Mr. Astle:

On behalf of the National Association of Buses, Trucks and Tractor Trailer Manufacturers (“ANPACT”), this submission responds to the Bureau of Industry and Security’s (“BIS”) Notice of Request for Public Comments<sup>1</sup> (“Notice”) concerning the investigation under Section 232 of the Trade Expansion Act of 1962, as amended (19 U.S.C. § 1862) (“Section 232”), to determine the effects on the national security of the imports of medium-duty trucks, heavy-duty trucks, and medium- and heavy-duty truck parts.

ANPACT appreciates the opportunity to present its views as Mexico’s representative of the exporters of medium- and heavy-duty trucks and importers and exporters of parts under the Agreement between the United States, Mexico and Canada (“USMCA” or “Agreement”). ANPACT’s submission addresses some of the criteria set out in the Notice.

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<sup>1</sup> 90 FR 17371 (April 25, 2025). Notice ID BIS-2025-0024.

**I. Trade of medium- and heavy-duty trucks and medium- and heavy-duty truck parts, and their derivative products under the USMCA legal framework does not threaten to impair U.S. national security**

ANPACT represents the industry of buses, trucks and tractor trailers manufacturers as well as engines, comprising companies that are highly integrated in the North America supply chain of medium- and heavy-duty trucks and medium- and heavy-duty truck parts.

As such, our companies operate within the USMCA legal framework. This means that our companies' exports are in full compliance with the rules of origin thereof.

The USMCA aims to strengthen the trade partnership among its Parties and build a secure region, specifically in key sectors, such as the medium- and heavy-duty truck industry. The product-specific rules of origin for automotive goods were designed to promote North American manufacturing and sourcing goods and materials in the region by establishing four major components: (i) specific regional value content ("RVC") requirement for medium- and heavy-duty trucks; (ii) specific RVC requirement for medium- and heavy-duty parts; (iii) specific labor value content ("LVC") requirement comprising high-wage materials, and manufacturing, assembly and technology expenditures; and (iv) specific percentage on purchases of USMCA originating steel and aluminum.

Since its entry into force, ANPACT's Members have complied with the applicable rules of origin of the USMCA without the need to request an alternative staging regime, rather Members decided to invest in fulfilling the commitments under the Agreement, aligning with North American standards and reinforcing North American supply chains.

In 2024, Mexico exported approximately 152,000 medium- and heavy-duty trucks to the United States. Mexican manufacturers complied with the USMCA strict rules of origin, including RVC requirement (64%),<sup>2</sup> LVC requirement (45%), and the sourcing of originating steel and aluminum (70%).

By 2027 the RVC requirement that must be met by manufacturers of medium- and heavy-duty trucks is 70%. In response, ANPACT's Members are actively working towards achieving the new threshold by reaffirming their commitment to increasing the competitiveness of the region. Our Members continue investing in North American operations, including strengthening the North American supply chain as this opportunity arises while moving from current 64% RVC to 70% RVC in 2027.

Hence, the Product-Specific rules of origin for medium- and heavy-duty trucks escalating from an RVC requirement of 60% in 2020 to an RVC requirement of 70% in 2027 ensures that the vehicle is predominantly manufactured within, and source from materials of, the North American region. The 45% LVC incentivizes investment in facilities within the United States promoting skilled labor force that is critical for national security. The 70% sourcing of the steel and aluminum requirement used in the production of medium- and heavy-duty trucks supports U.S. industries and ensures that critical materials come from trusted regional sources.

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<sup>2</sup> This includes the regional value content requirement of 64% for parts listed in Table D and 54% for parts listed in Table E of Appendix to Annex 4-B (Product-Specific Rules of Origin) of the USMCA.

The USMCA legal framework strengthens the domestic industrial base and reduces dependence on foreign suppliers (i.e. non-USMCA suppliers), which is one of the concerns under this investigation.

**II. The high integration of medium- and heavy-duty truck and medium- and heavy-duty truck parts, and their derivative products industry, enhances supply chain resilience essential for national security**

**A. Integration in North America**

The medium- and heavy-duty truck and medium- and heavy-duty truck parts, and their derivative products industry, is highly integrated. The USMCA has proven to be a key component for strengthening North American supply chain resilience capable of responding to global disruptions, such as COVID-19 pandemic, and geopolitical challenges.

Mexico's medium- and heavy-duty truck exports are deeply integrated with the U.S. supply chain. In average, over 50% of the content is American, including diesel engines. In fact, 70% of U.S. diesel engine exports are destined for Mexico.

The North American medium- and heavy-duty truck industry is a successful example of integration of the North American region under the USMCA, which has resulted in global competitiveness vis-à-vis other regions and through regional collaboration.

From its predecessor, the NAFTA, to the USMCA, the Mexican medium- and heavy-duty truck industry has remained a reliable and secure ally to the United States, forming one of the most integrated manufacturing networks in the world.

Mexico's medium- and heavy-duty truck exports to the United States directly respond to U.S. domestic demand. Between 2019 and 2024, these exports rose by 18%<sup>3</sup>, while imports of U.S. made auto parts and components into Mexico grew by 18%<sup>4</sup> over the same period.

In 2024 alone, Mexico imported approximately USD\$72.2 billion in auto parts from the United States. This figure represented 31% of total U.S. global exports of these goods.<sup>5</sup>

North America is the world's second-largest producer of medium- and heavy-duty trucks, accounting for approximately 15% of global production (as shown in Table 1 and in Figure 5). In 2024, the United States alone produced 58.8% of the region's total output as illustrated in Table 1 and Figure 4).

North America has a unique opportunity to bolster its global standing by strategically deepening regional integration and reinforcing supply chain resilience. These efforts would significantly enhance the competitiveness of its medium- and heavy-duty truck industry, positioning it more effectively against Asian counterparts.

<sup>3</sup> See Annex A – HS Codes for medium- and heavy-duty trucks.

<sup>4</sup> See Annex B – HS Codes for auto parts analyzed.

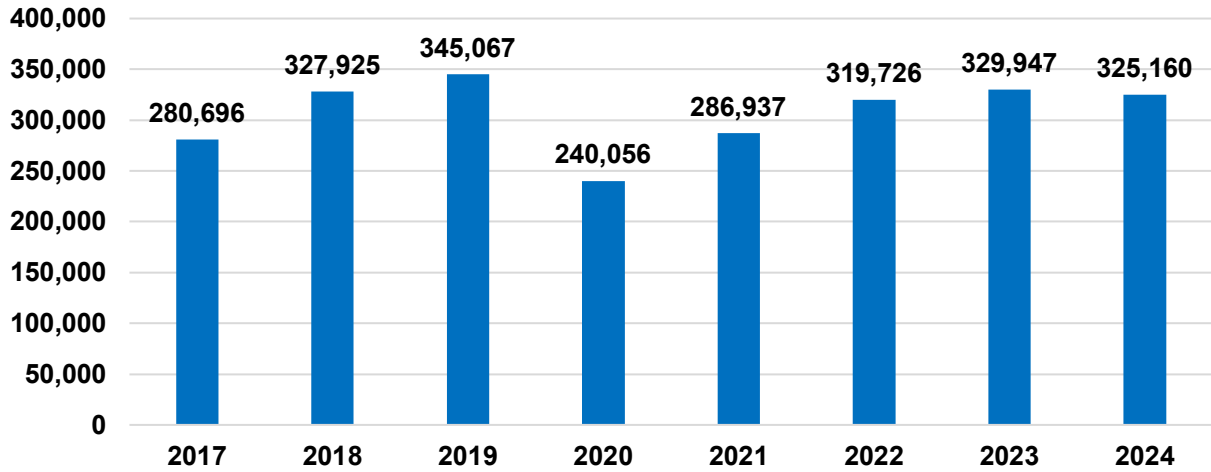
<sup>5</sup> Idem.

<b>Table 1. Medium- and Heavy-Duty Truck Production (units)</b>								
<b>Country</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>
<b>Canada</b>	18,431	20,966	23,311	14,223	12,504	10,898	17,529	22,227
<b>Mexico</b>	162,713	194,564	195,421	133,965	162,836	195,818	215,577	205,746
<b>United States (U.S.)</b>	280,696	327,925	345,067	240,056	286,937	319,726	329,947	325,160
<b>N.A. Total</b>	<b>461,840</b>	<b>543,455</b>	<b>563,799</b>	<b>388,244</b>	<b>462,277</b>	<b>526,442</b>	<b>563,053</b>	<b>553,133</b>
<b>U.S. %</b>	60.8%	60.3%	61.2%	61.8%	62.1%	60.7%	58.6%	58.8%
<b>MX %</b>	35.2%	35.8%	34.7%	34.5%	35.2%	37.2%	38.3%	37.2%
<b>Asia Oceania (AO)</b>	3,176,817	3,212,426	3,160,164	3,626,520	3,331,219	2,280,507	2,655,567	2,580,863
<b>-China</b>	2,257,562	2,130,880	2,217,847	2,976,459	2,408,249	1,249,268	1,645,195	1,655,941
<b>Europe</b>	309,890	310,143	257,530	236,328	293,881	299,188	372,626	334,007
<b>World Total</b>	4,086,253	4,202,851	4,122,809	4,364,595	4,273,156	3,298,378	3,724,703	3,640,069
<b>N.A. % / World Total</b>	11%	13%	14%	9%	11%	16%	15%	15%
<b>A.O % / World Total</b>	78%	76%	77%	83%	78%	69%	71%	71%
<b>China % / World Total</b>	55%	51%	54%	68%	56%	38%	44%	45%

Source: OICA Heavy Trucks Production. Note: U.S. and Canada figures includes buses.

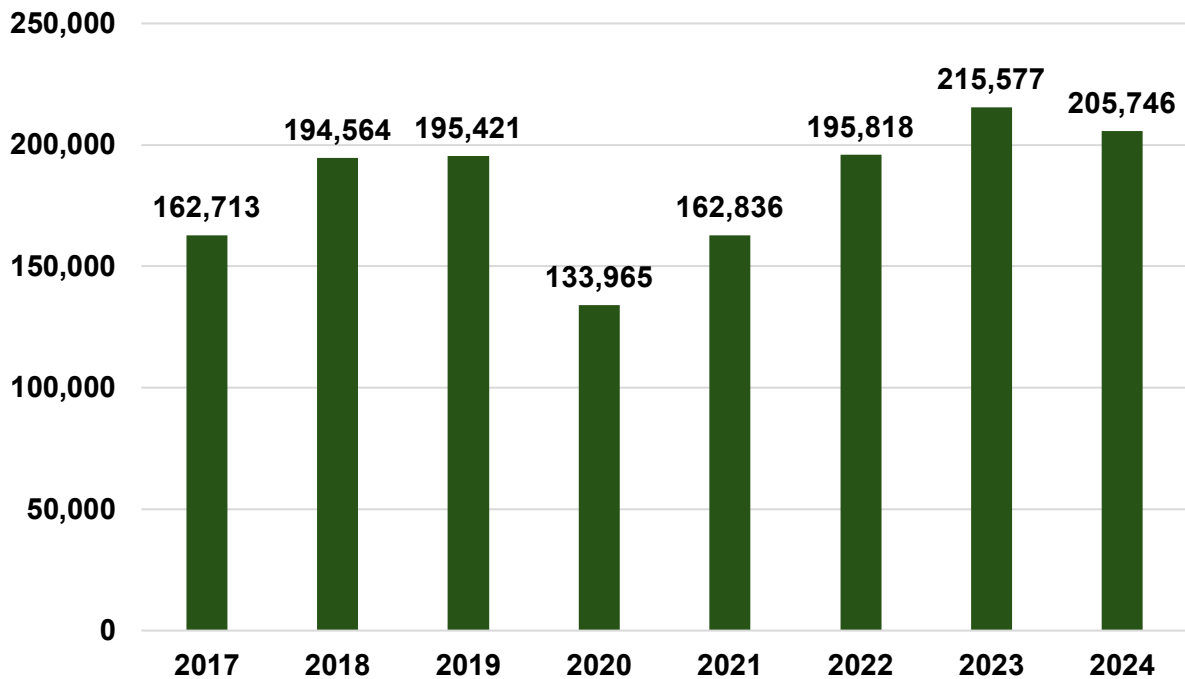
The production of medium- and heavy-duty trucks in units per North American country is shown in Figures 1, 2 and 3, and the aggregate production of the three countries is illustrated in Figure 4.

**Figure 1. United States' medium- and heavy-duty truck production (units)**



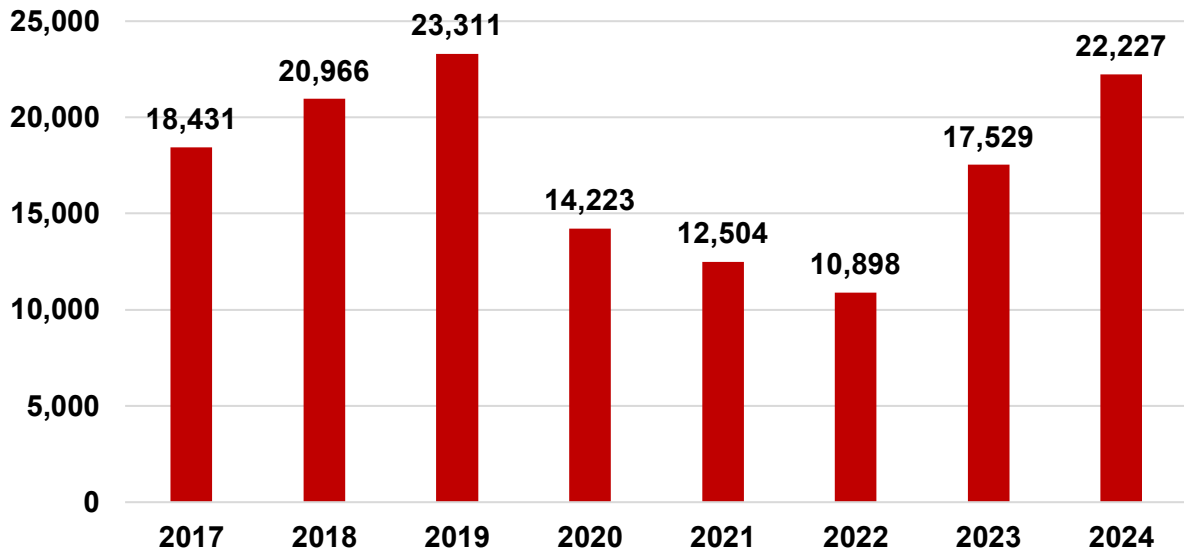
Source: OICA.

**Figure 2. Mexico's medium- and heavy-duty truck production (units)**



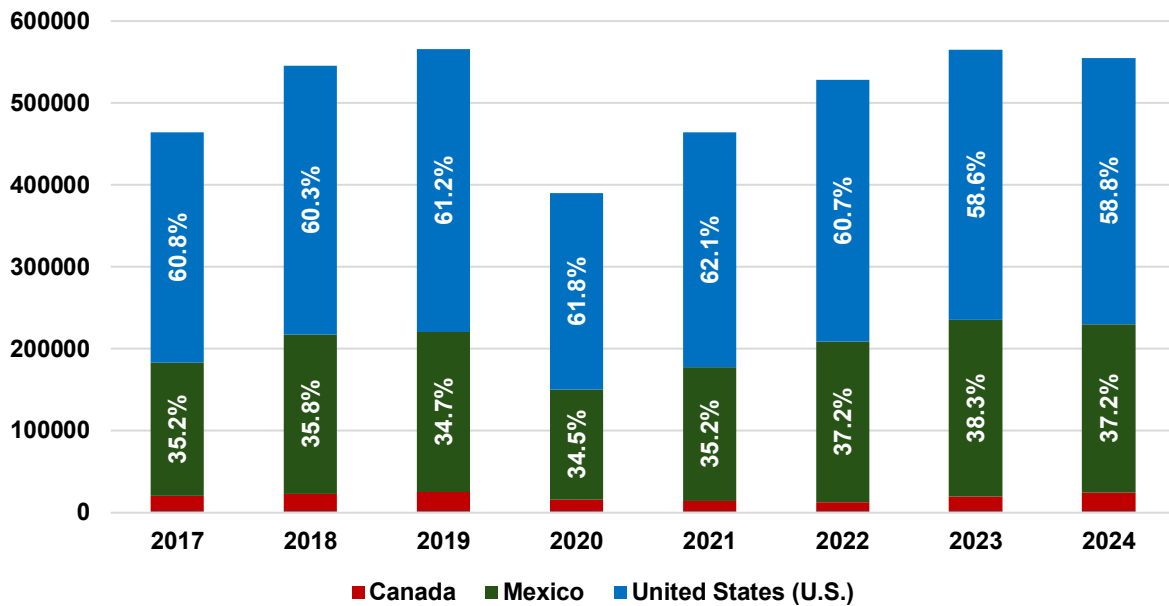
Source: OICA.

**Figure 3. Canada's medium- and heavy-duty truck production (units)**



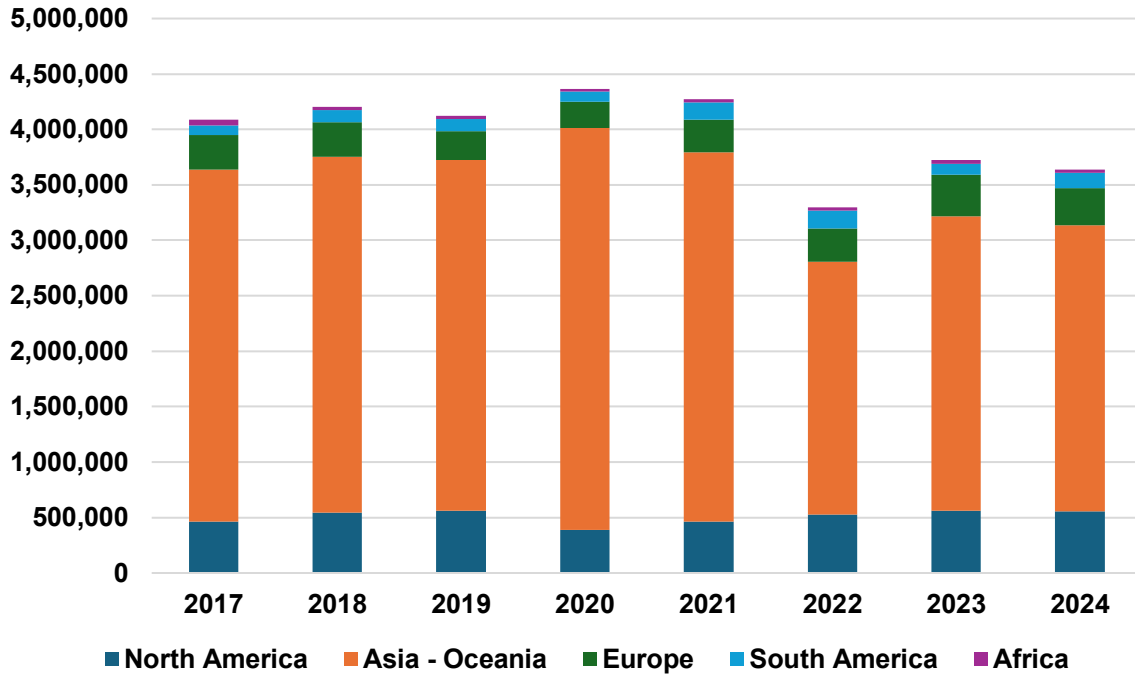
Source: OICA.

**Figure 4. United States, Mexico and Canada's medium- and heavy-duty truck production between 2017-2024 (units)**



Source: OICA.

**Figure 5. World's medium- and heavy-duty truck production by region**



Source OICA.

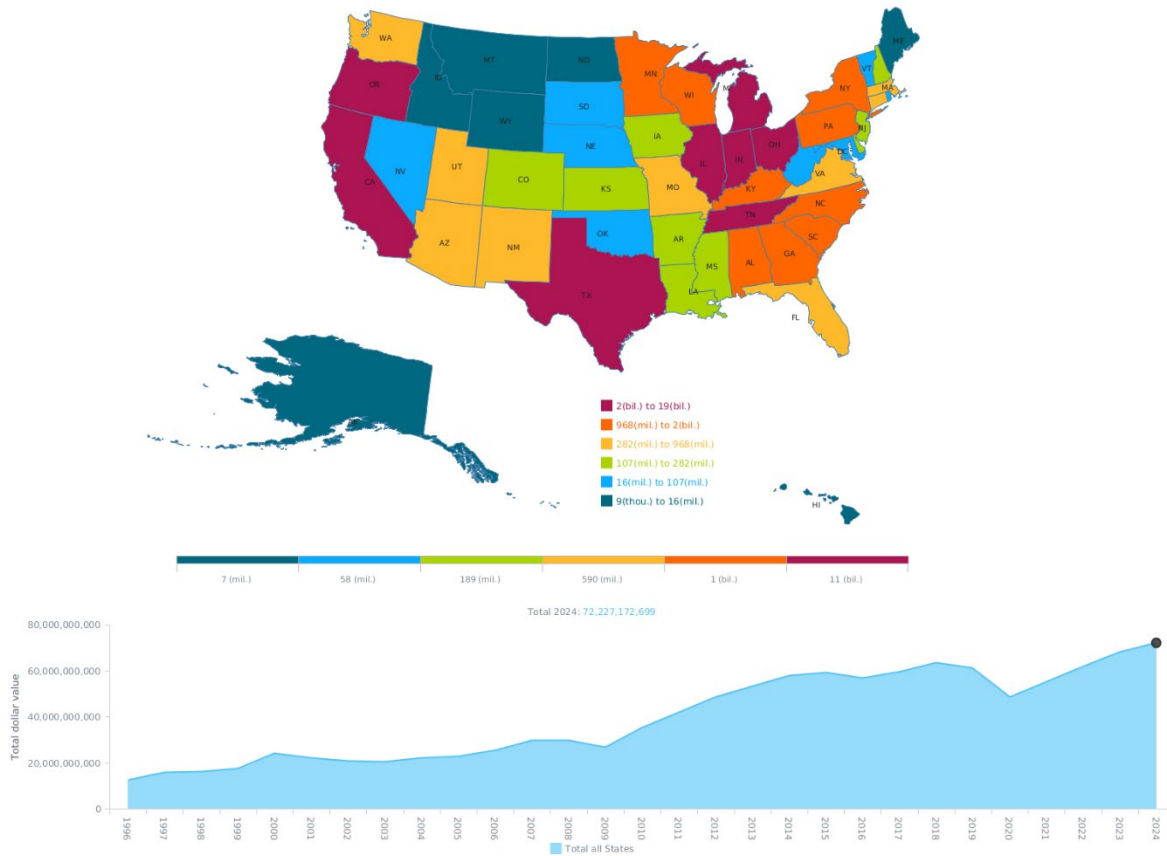
**B. Mexico is the main market for medium- and heavy-duty truck parts from the United States**

Mexico is the **top export destination** for auto parts from states such as Texas, Michigan, California, Oregon, Indiana, Tennessee, Minnesota, Georgia, Wisconsin, Alabama, South Carolina, Arizona, Missouri, New Mexico, Florida, Massachusetts, Utah, Arkansas and Louisiana (as illustrated in Table 2).

Mexico is also the **second largest export destination** of auto parts for Ohio, Illinois, North Carolina, New York, Kentucky, Pennsylvania, Washington, Virginia, Mississippi, New Jersey, Iowa, Kansas, Colorado, Nebraska, Puerto Rico, Rhode Island, West Virginia, South Dakota, Montana, and Wyoming (as shown in Table 2).

Figure 6 illustrates U.S. exports of auto parts by state.

**Figure 6. U.S. exports of auto parts by State**



	2024 To the World	2024 to MX	% of MX	MX Position vs. Global Exports
<b>TOTAL ALL STATES</b>	232,772,085,432	72,227,172,699	31.0%	1st export market
Texas	35,886,024,309	19,629,245,601	54.7%	1st export market
Michigan	22,634,556,844	9,357,915,110	41.3%	1st export market
California	24,395,622,126	7,604,243,099	31.2%	1st export market
Oregon	6,240,114,100	5,456,963,835	87.4%	1st export market
Indiana	10,667,579,790	3,999,539,488	37.5%	1st export market
Ohio	12,684,697,804	3,439,132,540	27.1%	2nd export market
Tennessee	6,843,976,831	3,044,905,809	44.5%	1st export market
Illinois	16,060,134,927	2,583,050,997	16.1%	2nd export market

Minnesota	4,159,596,099	1,435,796,014	34.5%	1st export market
North Carolina	4,737,521,211	1,392,852,811	29.4%	2nd export market
Georgia	5,709,999,564	1,268,879,433	22.2%	1st export market
Wisconsin	4,175,542,066	1,216,888,393	29.1%	1st export market
New York	6,438,984,653	1,053,636,190	16.4%	2nd export market
Alabama	2,213,961,613	1,033,652,879	46.7%	1st export market
South Carolina	5,245,461,246	1,022,014,537	19.5%	1st export market
Kentucky	5,943,054,018	976,934,499	16.4%	2nd export market
Pennsylvania	5,902,879,456	968,941,896	16.4%	2nd export market
Arizona	3,519,365,629	898,193,261	25.5%	1st export market
Missouri	1,816,383,459	633,541,199	34.9%	1st export market
New Mexico	792,097,071	630,521,187	79.6%	1st export market
Florida	8,082,985,341	575,015,189	7.1%	1st export market
Massachusetts	3,026,157,581	528,751,032	17.5%	1st export market
Utah	1,080,421,014	364,017,891	33.7%	1st export market
Washington	2,497,926,756	345,389,499	13.8%	2nd export market
Connecticut	2,678,925,161	332,247,021	12.4%	3rd export market
Virginia	1,715,547,325	282,186,434	16.4%	2nd export market
Mississippi	1,361,156,981	271,704,750	20.0%	2nd export market
New Jersey	2,388,499,628	244,282,574	10.2%	2nd export market
Iowa	1,366,869,190	236,251,406	17.3%	2nd export market
Arkansas	608,322,342	222,537,687	36.6%	1st export market

Source: Data provided by WISERTrade, at <http://www.wisertrade.org>, from US Census Bureau, Foreign Trade Division.  
See Annex B – HS Codes for auto parts analyzed.

### C. North American products are exported outside of the region

Beyond North America, Mexico is a major exporter of medium- and heavy-duty trucks containing U.S. components from the above-mentioned states to markets such as Colombia, Peru, Chile, Ecuador, Guatemala, Costa Rica, Panama, El Salvador, the Dominican Republic, Honduras, Nicaragua, Puerto Rico, and Australia (mostly with FMVSS Standards), as well as Canada. However, in some of these markets, Chinese vehicles are rapidly gaining market share, displacing vehicles from the U.S. and Mexico.

Mexico's production of medium- and heavy-duty trucks plays a vital role in supporting the broader North American parts industry —particularly benefiting U.S. suppliers— and contributes to the strength of the region's production ecosystem. This interdependence drives economic growth across North America while reinforcing shared security interests.

The goal of the North American integrated manufacturing network is to become the most competitive and secure globally, rivalling Asia and Europe. Realizing this ambition demands close collaboration among the USMCA partners. Measures such as the imposition of tariffs under Section 232 would undermine, rather than advance, this shared objective.

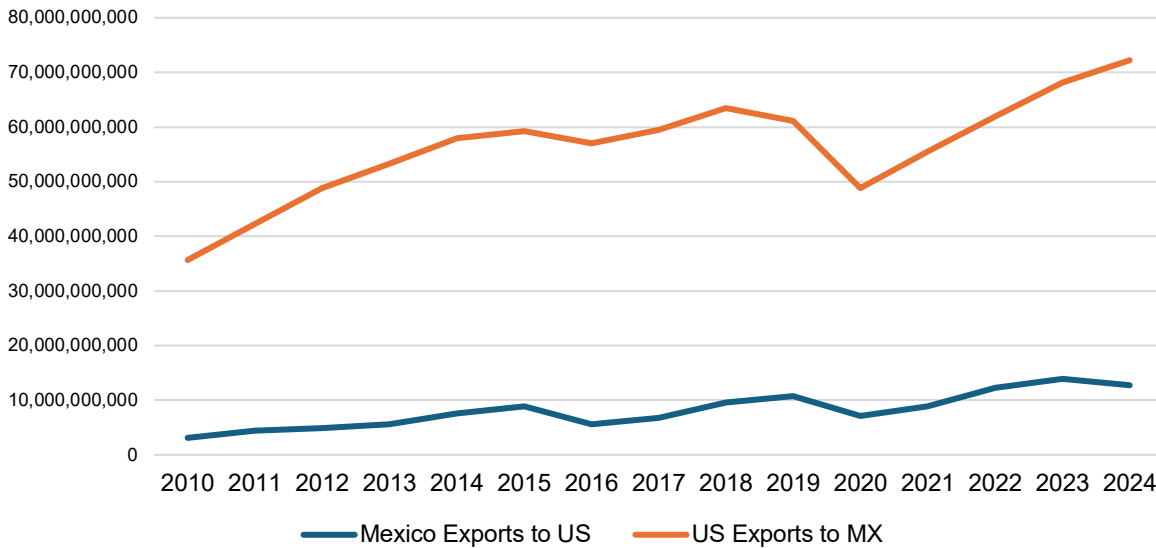
### D. The case example of Diesel Engines

All medium- and heavy-duty trucks imported into the United States from Mexico are equipped with USMCA originating diesel engines manufactured in the United States. The United States' exports amount to approximately USD\$5.4 billion in diesel engines<sup>6</sup> annually, representing 73% of which around USD\$3.9 billion are exported to Mexico.

Even though U.S. imports from Mexico have increased 103% from 2010 to 2024, the U.S. auto parts exports to Mexico rose by 308% in the same period as shown in Figure 7. This clearly illustrates the deep interconnectedness of both countries, highlighting the significant advantages for the U.S. auto parts industry.

Due to the deep integration of this industry, medium- or heavy-duty trucks imported from Mexico into the United States does not pose a threat to the U.S. national security. These vehicles contain U.S. made components, U.S. engines, and other important content variables from the United States, such as engineering work and research and development.

**Figure 7. Mexico's exports of medium- and heavy-duty trucks vs. U.S. exports of auto parts to Mexico**



Source: Data provided by WISERTrade, at <http://www.wisertrade.org>, from US Census Bureau, Foreign Trade Division. See Annex A – HS Codes for medium- and heavy-duty trucks and Annex B – HS Codes for auto parts analyzed.

### III. Technology comes from the United States

Research and development (R&D) for medium- and heavy-duty trucks produced in Mexico is driven by innovation in the United States. The medium- and heavy-duty industry in the United States is supported by numerous R&D / Engineering centers that develop

<sup>6</sup> HS Code 8408202000.

cutting-edge technologies used across North America, reducing dependence on foreign suppliers.

Medium- and heavy-duty trucks manufactured in Mexico are equipped with technology developed in U.S.-based research and development centers, strengthening supply chain security.

R&D hubs are pivotal in designing, engineering, and testing advanced systems that improve vehicle performance, safety, and environmental sustainability. These centers underpin North America’s competitive edge by ensuring the region retains the capability to develop, produce, and adapt critical technologies independently, thereby safeguarding its strategic and security interests.

#### IV. The United States and Mexico are complementary nations

The United States and Mexico maintain a deeply complementary economic relationship. U.S. domestic demand for medium- and heavy-duty trucks is significantly accompanied by imports from Mexico, illustrating the high degree of integration between both markets.

The U.S. medium- and heavy-duty truck market fluctuates annually, reflecting cyclical trends common to the global automotive industry. In 2024, the United States produced approximately 325,000 medium- and heavy-duty trucks —accounting for roughly 67% of domestic retail sales. During the same period, Mexico exported around 152,000 units to the U.S. market, representing 32% of U.S. retail demand (as illustrated in Table 3).

At the same time, the United States has increasingly positioned itself as a global export hub for medium- and heavy-duty trucks. Between 2019 and 2024, U.S. exports in this segment rose by 58%, reinforcing the strategic role of the North American region in global truck manufacturing and trade (as shown in Table 3).

	2019	2020	2021	2022	2023	2024
<b>United States Domestic Market</b>	528,143	404,332	461,631	468,916	507,272	482,290
<b>U.S. Production</b>	345,067	240,056	286,937	319,726	329,947	325,160
<b>U.S. Exports</b>	92,555	72,494	86,095	111,028	131,989	146,449
<b>U.S. Imports from Mexico</b>	159 256	109 328	132 720	157 491	170 452	152 087
<b>% of U.S. Production / U.S. Retail Market</b>	65%	59%	62%	68%	65%	67%
<b>% of MX imports in the U.S. domestic market</b>	30%	27%	29%	34%	34%	32%

<b>% of U.S. exports / U.S. Production</b>	27%	30%	30%	35%	40%	45%
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Note: Table made from different sources. Data may vary according to the classes that are included in each source.  
Sources: US Domestic Market: Wards, Mexico's exports: INEGI – RAIAMP and US Exports and imports: data provided by WISERTrade, at <http://www.wisertrade.org>, from US Census Bureau, Foreign Trade Division.

## V. Mexico is an ally to the United States

From an industry standpoint, Mexico remains firmly committed to North American integration. As a unified region, North America is better positioned to compete globally — particularly vis-à-vis Asia, where China alone accounts for more than 45% of global medium- and heavy-duty truck production (as shown in Table 1). Yet, despite this dominance, China has recently experienced a 26.6% decline in output, leaving over 1.3 million units in unused capacity.

Given these dynamics, Mexico is a trusted ally of the United States and remains fully committed to cooperation and coordinated responses to any issue that may affect the integrity or competitiveness of the North American supply chain.

## VI. China's exports to the United States

Between 2017 and 2024, U.S. truck production increased by 15.8%, while China's output declined by 26.6% (as illustrated in Table 1), resulting in more than 1.3 million units of unused manufacturing capacity. Despite this contraction, China's exports of medium- and heavy-duty trucks to global markets rose by 298% between 2018 and 2023. Chinese manufacturers have also expanded their presence in strategic markets previously served predominantly by North American producers.

This trend reflects a broader effort by China to reposition its industrial overcapacity toward export-driven market expansion. Leveraging cost advantages and economies of scale, Chinese producers are increasingly displacing North American manufacturers in key sectors.

In 2024, the United States imported approximately 26,000 medium- and heavy-duty trucks from China, valued at USD\$19.8 million. Notably, between 2018 and 2024, the value of China's exports of these vehicles to the U.S. increased by 749.4% (as shown in Table 4).

Given the strategic importance of the medium- and heavy-duty truck industry to the broader North American industrial base, this shift poses a direct challenge to the objectives of the USMCA. In response, it is essential that the United States, Mexico, and Canada reinforce the Agreement's commitment to regional economic integration and promote reliable, secure, and competitive supply chains within the bloc.

Strengthening intra-regional cooperation in this sector is not only economically prudent — it is essential to safeguarding North America's long-term industrial security and maintaining its global competitiveness.

<b>Table 4. U.S. medium- and heavy-duty trucks imports from China</b>			
<b>Year</b>	<b>Value (USD)</b>	<b>% Var</b>	<b>% Var 2024 vs. 2018</b>
<b>2018</b>	2,334,976		
<b>2019</b>	3,833,105	64.2%	
<b>2020</b>	6,279,281	63.8%	
<b>2021</b>	17,102,384	172.4%	
<b>2022</b>	10,942,827	-36.0%	
<b>2023</b>	18,899,393	72.7%	
<b>2024</b>	19,833,301	4.9%	<b>749.4%</b>

Source: Data provided by WISERTrade, at <http://www.wisertrade.org>, from US Census Bureau, Foreign Trade Division

## VII. Conclusion

ANPACT respectfully submits that the USMCA legal framework —particularly the comprehensive and enforceable rules of origin applicable to medium- and heavy-duty trucks, medium- and heavy-duty truck parts, and their derivative products— effectively addresses the United States’ national security concerns by reducing reliance on non-USMCA sources.

The imposition of additional tariffs under Section 232 on medium- and heavy-duty trucks, medium- and heavy-duty truck parts, and their derivative products that fully comply with USMCA rules would run directly counter to this objective. Far from enhancing national security, such measures would severely disrupt the high level of integration, regulatory alignment, and supply chain reliability that define the North American medium- and heavy-duty truck industry —ultimately harming economic stability and competitiveness across the entire region.

In light of the above, ANPACT respectfully requests imports of medium- and heavy-duty trucks, medium- and heavy-duty truck parts, and their derivative products that fully comply with the USMCA rules of origin be expressly excluded from this investigation and actions that may be implemented by the President pursuant to Section 232.

Please do not hesitate to contact us with any questions concerning this submission.

Thank you for your consideration.

Respectfully submitted,



Jaime Rogelio Arzate Tapia  
 Executive President  
 ANPACT, A.C.

Annex A – HS Codes for medium- and heavy-duty trucks analyzed.  
 Annex B – HS Codes for auto parts analyzed.

### Annex A – HS Codes for medium- and heavy-duty trucks analyzed

8701230015	Road Tractors For Semi-Trailers, Spark Ignition Engine And Electric Motor, New, G.V.W. Not Exceeding 36,287 Kg (80,000 Pounds)
8701230045	Road Tractors For Semi-Trailers, Spark Ignition Engine And Electric Motor, New, G.V.W. Exceeding 36,287 Kg (80,000 Pounds)
8701240015	Road Tractors For Semi-Trailers, New, Electric Motor, G.V.W. Not Exceeding 36,287 Kg (80,000 Pounds)
8701240045	Road Tractors For Semi-Trailers, New, Electric Motor, G.V.W. Exceeding 36,287 Kg (80,000 Pounds)
8704105020	Motr Vehicles For The Transport Of Goods, Rear Dump, Designed For Off-Highway Use, With Capacity Of 40.8 Metric Tons Or Less
8704105030	Motor Veh For The Transport Of Goods, Rear Dump, Designed For Off-Highway Use, With A Capacity Exceeding 40.8 Metric Tons But Not Exceed 63.5 Metric T
8704105040	Motor Veh For Transport Of Goods, Rear Dump, Designed For Off-Highway Use, With A Capacity Exceeding 63.5 Metric Tons But Not Exceed 90.7 Metric Tons
8704105050	Motr Veh For Transport Of Goods, Rear Dump, Off-Highway Use, Capacity Exceeding 90.7 Metric Tons
8704224120	Motor Vehicles For The Transport Of Goods, Nesoi, Diesel Engine, Gvw Exceeding 5 Metric Tons But Not Exceeding 9 Metric Tons
8704224140	Motor Vehicles For The Transport Of Goods, Nesoi, Diesel Engine, Gvw Exceeding 9 Metric Tons But Not Exceeding 12 Metric Tons
8704224160	Motor Vehicles For The Transport Of Goods, Nesoi, Diesel Engine, Gvw Exceeding 12 Metric Tons But Not Exceeding 15 Metric Tons
8704224180	Motor Vehicles For The Transport Of Goods, Nesoi, Diesel Engine, Gvw Exceeding 15 Metric Tons But Not Exceeding 20 Metric Tons
8704230100	Motor Vehicles For The Transport Of Goods, Nesoi, Diesel Engine, Gvw Exceeding 20 Metric Tons
8704320110	Motor Vehicles For The Transport Of Goods, Spark-Ignition Internal Combustion Piston Engine, Gvw Exceeding 5 M Tons But Not Exceeding 9 M Tons
8704320120	Motor Vehicles For The Transport Of Goods, Spark-Ignition Internal Combustion Piston Engine, Gvw Exceeding 9 M Tons But Not Exceeding 12 M Tons
8704320130	Motor Vehicles For The Transport Of Goods, Spark-Ignition Internal Combustion Piston Engine, Gvw Exceeding 12 But Not Exceeding 15 Metric Tons
8704320140	Motor Vehicles For The Transport Of Goods, Spark-Ignition Internal Combustion Piston Engine, Gvw Exceeding 15 But Not Exceeding 20 Metric Tons
8704320150	Motor Vehicles For The Transport Of Goods, Spark-Ignition Internal Combustion Piston Engine, Gvw Exceeding 20 Metric Tons
8704420020	Trucks Gvw 5-9 Metric Tons, W Both Compression-Ignition Internal Combustion Piston Engine (Diesel Or Semi-Diesel) And Electr Motor For Propuls
8704420040	Trucks Gvw 9-12 Metric Tons, W Both Compression-Ignition Internal Combustion Piston Engine (Diesel Or Semi-Diesel) And Electr Motor For Propuls

- 8704420060 Trucks Gvw 12-15 Metric Tons, W Both Compression-Ignition Internal Combustion Piston Engine (Diesel Or Semi-Diesel) And Electr Motor For Propuls
- 8704420080 Trucks Gvw 15-20 Metric Tons, W Both Compression-Ignition Internal Combustion Piston Engine (Diesel Or Semi-Diesel) And Electr Motor For Propuls
- 8704430000 Trucks Gvw Over 20 Metric Tons, W Both Compression-Ignition Internal Combustion Piston Engine (Diesel Or Semi-Diesel) And Electr Motor For Propulsion
- 8704520010 Trucks Gvw 5-9 Metric Tons, W Both Spark-Ignition Internal Combustion Piston Engine (Diesel Or Semi-Diesel) And Electr Motor For Propuls
- 8704520020 Trucks Gvw 9-12 Metric Tons, W Both Spark-Ignition Internal Combustion Piston Engine (Diesel Or Semi-Diesel) And Electr Motor For Propuls
- 8704520030 Trucks Gvw 12-15 Metric Tons, W Both Spark-Ignition Internal Combustion Piston Engine (Diesel Or Semi-Diesel) And Electr Motor For Propuls
- 8704520040 Trucks Gvw 15-20 Metric Tons, W Both Spark-Ignition Internal Combustion Piston Engine (Diesel Or Semi-Diesel) And Electr Motor For Propuls
- 8704520050 Trucks Gvw Over 20 Metric Tons, W Both Spark-Ignition Internal Combustion Piston Engine (Diesel Or Semi-Diesel) And Electr Motor For Propulsion
- 8704600000 Trucks/Motor Vehicles For The Transport Of Goods, With Only Electric Motor For Propulsion, Nesoi
- 8704900100 Trucks/Motor Vehicles For The Transport Of Goods, Nesoi
- 8705100010 Mobile Cranes, Cable Operated
- 8705100050 Mobile Cranes, Nesoi
- 8705200000 Mobile Drilling Derricks
- 8705300000 Fire Fighting Vehicles
- 8705400000 Concrete Mixers, Special Purpose Vehicle
- 8705900000 Special Purpose Vehicles, Nesoi
- 8704225010 Motor Vehicles For The Transport Of Goods, Nesoi, Diesel Engine, Gvw Exceeding 5 Metric Tons But Not Exceeding 9 Metric Tons
- 8704225090 Motor Vehicles For The Transport Of Goods, Nesoi, Diesel Engine, Gvw Exceeding 15 Metric Tons But Not Exceeding 20 Metric Tons
- 8701210015 Road Tractors For Semi-Trailers, Compression Ignition Engine, New, G.V.W. Not Exceeding 36,287 Kg (80,000 Pounds)
- 8701210045 Road Tractors For Semi-Trailers, Compression Ignition Engine, New, G.V.W. Exceeding 36,287 Kg (80,000 Pounds)
- 8704225050 Motor Vehicles For The Transport Of Goods, Nesoi, Diesel Engine, Gvw Exceeding 12 Metric Tons But Not Exceeding 15 Metric Tons
- 8704225030 Motor Vehicles For The Transport Of Goods, Nesoi, Diesel Engine, Gvw Exceeding 9 Metric Tons But Not Exceeding 12 Metric Tons
- 8704320020 Motor Vehicles For The Transport Of Goods, Spark-Ignition Internal Combustion Piston Engine, Gvw Exceeding 9 M Tons But Not Exceeding 12 M Tons
- 8704320050 Motor Vehicles For The Transport Of Goods, Spark-Ignition Internal Combustion Piston Engine, Gvw Exceeding 20 Metric Tons
- 8704320040 Motor Vehicles For The Transport Of Goods, Spark-Ignition Internal Combustion Piston Engine, Gvw Exceeding 15 But Not Exceeding 20 Metric Tons

- 8704320030 Motor Vehicles For The Transport Of Goods, Spark-Ignition Internal Combustion  
Piston Engine, Gvw Exceeding 12 But Not Exceeding 15 Metric Tons
- 8704900000 Motor Vehicles For The Transport Of Goods, Nesoi
- 8704230000 Motor Vehicles For The Transport Of Goods, Nesoi, Diesel Engine, Gvw Exceeding  
20 Metric Tons
- 8701200050 Road Tractors For Semi-Trailers, Nesoi
- 8701200045 Road Tractors For Semi-Trailers, New, Gvw Exceeding 36,287 Kg (80,000 Pounds)
- 8701220015 Road Tractors For Semi-Trailers, Compression Ignition Engine And Electric Motor,  
New, G.V.W. Not Exceeding 36,287 Kg (80,000 Pounds)
- 8701220045 Road Tractors For Semi-Trailers, Compression Ignition Engine And Electric Motor,  
New, G.V.W. Exceeding 36,287 Kg (80,000 Pounds)
- 8701200030 Tractors, Road Type For Semi-Trailers,With Compression-Ignition Internal Combt  
Pistn Eng (Diesl Or Sem-Diesl) Gvw Exceeding 36,287 Kg
- 8701200020 Tractors, Road Type For Semi-Trailers,With Compression-Ignition Internal Combt  
Pistn Eng (Diesl Or Sem-Diesl) Gvw Not Exceeding 36,287 Kg
- 8701200015 Road Tractors For Semi-Trailers, New, Gvw Not Exceeding 36,287 Kg (80,000  
Pounds)

## Annex B – HS Codes for auto parts analyzed

381900 Hydraulic Brake Fluid  
 382000 Anti-Freeze  
 392350 Stoppers, lids, caps and other closures  
 392630 Fittings for furniture, coachwork or the like  
 392690 General Use Plastic Articles  
 400912 Pipe, Not Reinforced/Comb. W/ Materials W/ Fittings  
 400922 Pipes, Vulc Rub, Reinforced/Combo With Metal,W/ Fitting  
 400931 Reinforced or otherwise combined only with textile materials: Without fittings  
 400932 Pipe of Vul Rub, Reinforced W/ Text Only Mat,W/Fittings  
 400942 Pipe, Reinforced/Comb W/Other Textile Mat,W/Fittings  
 401031 Endless Trans. Belts V-Belt/V-Ribbed/Circ 60-180Cm  
 401032 Endless Trans. Belts V-Belt, Circ 60-180Cm, Nesoi  
 401033 Endless Trans Belts V-Belt/V-Ribbed/Circ 180-240Cm  
 401034 Endless Trans. Belts V-Belt, Circ 180-240Cm, Nesoi  
 401039 Transmission Belt/Belting, of Vulcanize Rub, Nesoi  
 401110 New Pneumatic Tires of Rubber, for Motor Cars  
 401120 New Pneumatic Tires of Rubber, for Buses or Trucks  
 401211 Retreaded Tires of Rubber, for Use on Motor Cars  
 401212 Retreaded Tires of Rubber, for Use on Trucks  
 401219 Retreaded Tires of Rubber, Nesoi  
 401310 Inner Tubes of Rubber for Mot Cars, Buses & Trucks  
 401610 Articles Nesoi, Of Vulcanized Rubber Other Than Hard Rubber, Of Cell Rubber  
 401693 Gasket, Washers & Other Seals, of Vulcanized Rub  
 401699 Articles of Soft Vulcanized Rubber Nesoi  
 490890 Other  
 681320 Containing asbestos  
 681381 Not containing asbestos: brake linings and pads  
 681389 Not containing asbestos: other  
 681510 Non-electrical articles of graphite or other carbon  
 700711 Toughened Safety Glass of Size a Shape for Vehicles Etc  
 700721 Laminated Safety Glass for Vehicles, Aircraft Etc.  
 700910 Rear-View Mirrors for Vehicles  
 701400 Signalling glassware and optical elements of glass (other than those of heading 7015), not optically worked.  
 731511 Articulated link chain and parts thereof: roller chain  
 731815 Threaded articles: other screws and bolts, whether or not with their nuts or  
 731816 washers  
 Lugnuts  
 732010 Leaf Springs and Leaves Therefor, of Iron or Steel  
 732020 Helical Springs of Iron or Steel  
 830120 Locks of a Kind Used On Motor Vehicles, Base Metal  
 830210 Hinges, and Parts Thereof, of Base Metal  
 830230 Other Base Metal Mountings, Fittings Etc for Motor Vehicles  
 830260 Automatic door closers  
 830990 Other  
 831000 Sign plates, name-plates, address-plates and similar plates, numbers, letters and  
 840731 other symbols, of base metal, excluding those of heading 9405.  
 Spark-Ignition Piston Engine for Vehicle Ex Railway Not Over 50 Cc  
 840732 Spark-Ignition Reciprocating Piston Engine Etc Nov 250Cc  
 840733 Spark-Ignition Reciprocating Piston Engine Etc >250 Nov1000Cc  
 840734 Spark-Ignition Reciprocating Piston Engine Etc > 1000 Cc  
 840820 Compression-Ignition Internal Combustion Piston Engine Etc

840991 Spark-Ignition Internal Combustion Piston Engine Parts Nesoi  
 840999 Spark-Ignition Reciprocating Internal Combustion Piston Engine Parts  
 841330 Fuel, Lub/Cooling Med Pumps for Internal Comb Piston Engine  
 841350 Hydraulic Fluid Power Pumps  
 841391 Parts of hydraulic fluid power pumps  
 841430 Compressors Used In Refrigerating Equipment  
 841459 Fans, Nesoi (turbochargers and superchargers)  
 841480 Air/Gas Pumps, Compressors and Fans Etc, Nesoi  
 841520 Automotive Air Conditioners  
 841590 Parts, Nesoi, of Air Conditioning Machines  
 842123 Filtering or purifying machinery and apparatus for liquids: oil or petrol-filters for  
 842131 internal combustion engines  
 Filtering or purifying machinery and apparatus for gases: intake air filters for  
 842139 internal combustion engines  
 Catalytic converters  
 842199 Parts: other  
 842541 Jacks; hoists of a kind used for raising vehicles: built-in jacking systems of a type  
 used in garages  
 842542 Jacks; hoists of a kind used for raising vehicles: other jacks and hoists, hydraulic  
 842549 Jacks, Nesoi; Hoists for Raising Vehicles, Nesoi  
 842691 Lifting or Handling Machinery for Road Vehicles  
 843110 Parts for Pulley Tackle, Hoist Ex Skip, Winches, Etc  
 847989 Electronic brake systems incl. ABS and ESC systems  
 848120 Valves for Oleohydraulic or Pneumatic Transmissions  
 848130 Check Valves  
 848180 Taps Cocks Etc for Pipe Vat Inc Thermo Control Nesoi  
 848210 Ball Bearings  
 848220 Tapered Roll Bearings, Including Cone & Roller Assemblies  
 848230 Spherical Roller Bearings  
 848240 Needle Roller Bearings  
 848250 Cylindrical Roller Bearing Nesoi  
 848280 Other Ball or Roll Bearings, Inc Comb Ball/Roll Bearings  
 848291 Balls, Needles and Rollers for Bearings  
 848299 Parts: other  
 848310 Transmission Shafts (Inc Cam-& Crank-Shaft), Etc.  
 848320 Housed Bearings, Incorp Ball or Roller Bearings  
 848330 Bearing Housings; Plain Shaft Bearings  
 848340 Gears; Ball or Roller Screws; Gear Boxes, Etc  
 848350 Flywheels and Pulleys, Including Pulley Blocks  
 848360 Clutches and Shaft Couplings (Incl. Universal Joints)  
 848390 Toothed Wheels, Chain Sprockets & Other Trans Elem; Parts  
 848410 Gaskets and similar joints of metal sheeting combined with other material or of  
 two or more layers of metal  
 848420 Mechanical seals  
 848490 Other  
 848790 Other  
 850110 Electric Motors of an Output Not Exceeding 37.5 W  
 850120 Universal Ac/Dc Motors of an Output > 37.5 W  
 850131 Dc Motors & Generators W Output N Over 750 W  
 850132 Dc Motors & Generators W Output > 750W; N Over 75 Kw  
 850133 Dc Motors & Generators W Output > 75Kw; N Over 375Kw  
 850140 Other AC motors, single-phase  
 850152 Other AC motors, multi-phase: of an output exceeding 750 W but not exceeding  
 75 kW

- 850153 Other AC motors, multi-phase: of an output exceeding 75 kW
- 850300 Parts suitable for use solely or principally with the machines of heading 8501 or 8502.
- 850520 Electromagnetic couplings, clutches and brakes
- 850590 Other Electromagnets and permanent magnets, including parts
- 850710 Lead-Acid Batteries of a Kind Used for Stg Engines
- 850720 Lead-Acid Storage Batteries Nesoi
- 850730 Nickel-Cadmium Storage Batteries
- 850740 Nickel-Iron Storage Batteries
- 850750 Nickel-metal Hydride Batteries
- 850760 Lithium Ion Batteries
- 850780 Storage Batteries Nesoi
- 850790 Parts Elect Storage Batteries Including Separators Thereof
- 851110 Internal Combustion Engine Spark Plugs
- 851120 Internal Combustion Engine Magnetos, Magneto-Dynam
- 851130 Distributors; Ignition Coils
- 851140 Internal Combustion Engine Starter Motors
- 851150 Internal Combustion Engine Generators, Nesoi
- 851180 Elect Ignition/Start Equipment for Spark/Comp Engine; Generator Nesoi
- 851190 Parts Elect Ignition/Start Equip; Generators & Cut-Outs
- 851220 Elect Lighting/Visual Signaling Equipment Ex for Bicycles
- 851230 Electrical Sound Signaling Equipment for Motor Vehicles
- 851240 Windshield Wiper Defroster & Demister for Cycle/Motor Vehicle
- 851290 Parts Elect Lighting/Signaling Equipment Windshield Wiper Defroster Etc
- 851679 Other electro-thermic appliances: other
- 851712 Telephone sets, including telephones for cellular networks or for other wireless networks: telephones for cellular networks or for other wireless networks
- 851761 Other apparatus for transmission or reception of voice, images or other data, including apparatus for communication in a wired or wireless network (such as a local or wide area network: base stations
- 851762 Other apparatus for transmission or reception of voice, images or other data, including apparatus for communication in a wired or wireless network (such as a local or wide area network: machines for the reception, conversion and transmission or regeneration of voice, images or other data, including switching and routing apparatus
- 851840 Audio-frequency electric amplifiers
- 851981 Sound Recording/Reproducing App Magnetic/Optical/Semiconductor Nesoi
- 852290 Other
- 852560 Transmission apparatus incorporating reception apparatus
- 852580 TV Cameras, Digital Cameras, Video Camera Recorders
- 852691 Radio navigational aid apparatus incl. GPS equip.
- 852692 Radio remote control apparatus
- 852721 Radiobroadcast Receivers for Motor Vehicles W Rcos
- 852729 Radiobroadcast Receivers for Motor Vehicles Nesoi
- 852859 Monitors, Not Incorporating TV Reception Apparatus
- 852910 Antennas and Antenna Reflectors and Parts Thereof
- 852990 Parts for Radio Trans. Radar Radio Navigational Aid
- 853180 Electric Sound or Visual Signaling Apparatus Nesoi
- 853610 Fuses
- 853641 Relays for a Voltage Not Exceeding 60 V
- 853650 Elect Switches for Voltage Not Over 1000 V, Nesoi
- 853690 Elect Apparatus for Protect to Elect Circuit Nov 1000 V Nesoi
- 853710 Controls Etc W Elect Appr for Elect Cont Nov 1000 V
- 853910 Sealed Beam Electric Lamp Units

854449 Other electrical conductors, for a voltage not exceeding 1,000 V: other  
853921 Tungsten Halogen Electric Filament Lamps  
854370 Electrical Machines & Apparatus Having Ind Functions  
854430 Insulated Wiring Sets for Vehicles Ships Aircraft  
854442 Other electric conductors: Fitted with connectors  
854520 Electrical Carbon or Graphite Brushes  
870600 Chassis W Engine for Trac, Motor Vehicle for Pass/Good & Special Purpose  
870710 Bodies for Motor Cars/Vehicles for Transporting Persons  
870790 Bodies for Road Tractors and Motor Vehicles (Pub Tran, Etc)  
870810 Bumpers and Parts, for Motor Vehicles  
870821 Safety Seat Belts for Motor Vehicles  
870829 Parts & Accessories of Bodies of Motor Vehicles, Nesoi  
870830 Brakes and Servo-Breaks; Parts Thereof  
870840 Gear Boxes for Motor Vehicles  
870850 Drive Axles with Differential for Motor Vehicles  
870870 Road Wheels & Parts & Accessories for Motor Vehicles  
870880 Suspension Shock Absorbers for Motor Vehicles  
870891 Radiators for Motor Vehicles  
870892 Mufflers and Exhaust Pipes for Motor Vehicles  
870893 Clutches and Parts Thereof for Motor Vehicles  
870894 Steering Wheels, Columns & Boxes for Motor Vehicles  
870895 Safety Airbags with Inflator System; Parts Thereof  
870899 Parts and Accessories of Motor Vehicles, Nesoi  
871690 Parts Trailers, Semi-Trailer & Other Vehicle Not Mechanically Propelled  
901410 Direction finding compasses  
902519 Thermometers not combined with other instruments  
902610 Instruments for Measuring Flow or Level of Liquids  
902620 Instruments for Measuring Pressure of Liquids Gases  
902710 Gas or smoke analysis apparatus: Electrical  
902790 Microtomes; parts and accessories  
902910 Revolution Counters, Production Counters, Etc  
902920 Speedometers and Tachometers; Stroboscopes  
902990 Parts for Revolution Counters, Odometer, Etc  
903149 Measuring or Checking Instruments Appliances  
903180 Measuring & Checking Instrument, Appliances & Mach Nesoi  
903289 Auto Regulating Ins & Appr Ex Thermostat, Mnstat, Etc  
903290 Parts & Accessories of Automatic Regulating Instruments  
903089 Other  
910400 Instrument Panel Clocks & Clock Similar, for Vehicle  
940120 Seats of a Kind Used for Motor Vehicles  
940190 Parts of Seats (Ex Medical, Barber, Dental Etc)  
961380 Other lighters  
961390 Parts