



## Update as of April 9, 2025

On April 9th, President Trump paused most of the reciprocal tariffs for 90 days but raised the tariffs on China to 125%. The 10% baseline tariffs for most countries remain in effect. Jewelers of America will continue to monitor, provide updates, and consult with our Legislative Counsel in order to advocate for our members.

Jewelers of America Members can find the most up-to-date information on the webpage in our Member Center: [What You Need to Know About Tariffs](#).

## Previous Information as of April 8, 2025

Jewelers of America held a webinar on April 7, 2025, "Q&A: Tariffs and the Jewelry Industry," with panelist Jon Gold from the National Retail Federation (NRF). Below is the information shared during the webinar, along with answers to the questions that were submitted during the live webinar.

The webinar recording is available to Jewelers of America members [here](#); login is required. If you would like to access the recording—and member benefits including updates on issues like tariffs—and are not a Jewelers of America member, visit [jewelers.org/join](https://jewelers.org/join) to learn more; or contact member services at (800) 223-0673 or email [members@jewelers.org](mailto:members@jewelers.org).

Please note that the situation around tariffs is evolving and specifics on how tariffs will be applied may vary. The following information is to the best of our understanding as of today, April 8, 2025 at 11am EDT.\*

## PART I: INFORMATION ON THE TARIFFS SHARED DURING THE WEBINAR

### Jewelers of America Slide

- The tariff will be applied based on "country of origin"
  - In the case of rough diamonds or gemstones (that have not been cut and polished), this is the country where the goods were mined. For example, rough diamonds from Botswana would be subject to a 38 percent tariff if imported into the United States.
  - Or, for polished diamonds or gemstones the substantial transformation rule applies and the country where it is cut and polished is considered the country of origin. For example, diamonds polished in India would be subject to a 27 percent tariff regardless of country of mining.
- For jewelry, casting is considered the origin-conferring process. Performing casting in a country with a lower tariff rate could result in a lower overall duty, even if subsequent manufacturing occurs elsewhere.
- Exemption: Raw precious metals including gold are currently exempt, but that could change.



## NRF Slide 1: "Tariff Actions to Date"

- National emergency tariffs (IEEPA) on border issues announced Feb. 1
  - China 10% (Feb. 4), increased to 20% (March 4)
  - Canada/Mexico 25% - effective March 4, USMCA qualifying goods excluded
- Steel and aluminum: 25% tariffs – effective March 12
- Auto and Auto parts: 25% tariffs -- effective April 3
- Reciprocal Tariffs: Announced April 2
  - Global 10% tariff – effective April 5
  - "Reciprocal" country tariff – effective April 9
- Additional sectoral tariff threats
  - Copper (232 investigation launched)
  - Timber/Lumber (232 investigation launched)
  - Ag Products, Pharmaceuticals, Semiconductors, etc.
- 25% tariff against countries who import Venezuelan oil
- USTR proposed Chinese-built ship "port service fee"

## NRF Slide 2: Goals of the Tariffs

- Negotiating leverage over countries
- Shift sourcing out of China
- Bring manufacturing back to the U.S.
- Revenue

## PART II: IMPACT OF TARIFFS ON COSTS AND SOURCING

### Question: What is Jewelers of America doing to advocate for reduced tariffs on jewelry components?

**Answer:** Jewelers of America is actively advocating for a more reasonable and fair approach to the tariffs. Jewelers of America is working with our legislative counsel in D.C. to advocate for reducing the impact of tariffs on our members and the broader industry. While we support holding trading partners accountable and restoring fairness for American businesses, this should be accomplished without implementing sweeping tariffs that unduly burden American consumers and businesses and create widespread economic uncertainty.

To support our efforts, we've asked Jewelers of America members to get involved in the following ways: (If you are not already a member of Jewelers of America, we encourage you to [join today](#).)

- Use our Legislative Action Center alert and talking points on tariffs to send messages directly to Congress and the Administration about the impact of tariffs on your business.
- Jewelers of America members are also asked to join the Jewelers of America Political Action Committee, the only PAC that represents the interests of the fine jewelry industry in Washington, D.C. and help strengthen the industry's voice.



The larger the PAC, the louder our voice.

## Question: How are current U.S. import tariffs affecting the cost and sourcing of colored gemstones (like sapphires, rubies, spinel)?

**Answer:** The impact will depend on where the gemstones were sourced and how they are classified at the time of importation into the United States. For example, a natural rough ruby mined in Madagascar would be subject to a tariff of 47 percent for importation. If it has been cut and polished, or is manufactured into a piece of finished jewelry before being imported into the United States, the tariff rate would be based on the country where the manufacturing or "substantial transformation" took place.

## Question: Are small-scale importers feeling the pressure more than larger retailers?

**Answer:** While it is too early to say what the specific impact is, based on what we are hearing from members and organizations like the National Retail Federation, smaller businesses are more vulnerable to these changes. For example, a smaller retailer may not have as much leverage to offset the additional costs in the way a larger retailer may be able to do so.

Jewelers of America is actively communicating with members of Congress and policymakers on how the tariffs are impacting our members and the industry at large, emphasizing that many of our independent and smaller businesses will be under the greatest amount of pressure.

Algeria	30%
Angola	32%
Bangladesh	37%
Bosnia and Herzegovina	36%
Botswana	38%
Brunei	24%
Cambodia	49%
Cameroon	12%
Chad	13%
China	34%
Cote d'Ivoire	21%
Democratic Republic of Congo	11%
Equatorial Guinea	13%
European Union	20%
Falkland Islands	42%
Fiji	32%
Guyana	38%
India	27%
Indonesia	32%
Iraq	39%
Israel	17%
Japan	24%
Jordan	20%
Kazakhstan	27%
Lesotho	50%
Libya	31%

Liechtenstein	37%
Madagascar	47%
Malaysia	24%
Mauritius	40%
Moldova	31%
Mozambique	16%
Myanmar (Burma)	45%
Namibia	21%
Nauru	30%
Nicaragua	19%
Nigeria	14%
North Macedonia	33%
Norway	16%
Pakistan	30%
Philippines	18%
South Africa	31%
South Korea	26%
Sri Lanka	44%
Switzerland	32%
Taiwan	32%
Thailand	37%
Tunisia	28%
Venezuela	15%
Vietnam	46%
Zambia	17%
Zimbabwe	18%



**Question: How do we justify to clients who are buying diamonds the enormous price increase, but with no increase in value?**

**Answer:** There is no right or wrong answer here. Jewelers who need to increase costs because of the tariffs should be transparent with customers about why there is a price increase. They may need to educate customers about how the origin of the piece may be impacted by the tariffs. Jewelers should collaborate with their suppliers to mitigate the costs as much as possible and continue to focus on the intrinsic qualities and emotional significance of jewelry, while acknowledging the challenging economic realities that are not just impacting the jewelry industry.

## PART III: UNDERSTANDING TARIFFS ON SPECIFIC TYPES OF GOODS AND COUNTRIES

The following is the full list of reciprocal tariffs announced as of April 3, 2025, as per the Administration's Annex to the Executive Order. Please note that certain industry products including raw precious metals and bullion are exempt from the new tariffs for the time being:

**Question: Are there tariffs on scrap jewelry, or jewelry sweeps sent to the US for precious metal and/or stone reclaim?**

**Answer:** Based on the current information available, there are no specific exemptions mentioned for scrap jewelry or jewelry sweeps, and the broad application of tariffs to most imported products suggests that these items would be subject to the new tariffs.

**Question: Can you clarify which country's tariff will apply in this scenario: a diamond mined in Botswana but cut and polished in India?**

**Answer:** In this scenario, the India tariff would be applied since the diamond was cut and polished in India. According to U.S. Customs, country of origin for goods that have undergone "substantial transformation" is based on where the goods were cut/polished/manufactured. If a rough diamond was directly imported from Botswana without being processed, the tariff would be based on the tariff rate for Botswana.

**Question: What about tariffs on pieces made in France?**

**Answer:** Goods imported from and manufactured in France would be subject to the 20 percent tariff rate on the European Union. See the graph above.

**Question: Are all of the EU 20 percent tariffs or will it be broken down by individual country?**

**Answer:** The reciprocal Tariff of 20 percent is on all goods imported from the European Union, not individual countries from the region.



## Question: What are the total cumulative tariffs on diamond jewelry?

**Answer:** This depends on the country of origin and the tariffs for that country. For example, as of April 9th, China faces a 34 percent new tariff, in addition to the 20 percent put in effect earlier this year. Additionally, previous tariffs (some implemented in 2019) would also be added into the total rate, so the total cumulative tariff could be higher, depending on existing duties.

## Question: Can you share the “all in” total tariff rate for China? Hearing the effective rate is close to 70 percent?

**Answer:** The tariff rate of close to 70 percent for China comes from an example given during the Jewelers Vigilance Committee's webinar “Rapid Response: Navigating New Tariffs in the Jewelry Industry” by guest Peter Klestadt, a trade attorney with experience in customs, import-export regulations, and tariffs at Grunfeld, Desiderio, Lebowitz, Silverman & Klestadt LLP (GDLSK). In his example, he noted that the new reciprocal tariffs of 34 percent on China are in addition to existing tariffs on jewelry from China including:

- Section 301 tariffs implemented during the first Trump administration and continued under the Biden administration at a rate of 7.5 percent
- Existing duties of 5.5 percent
- Recently added 20 percent flat tariff imposed by the March 2025 Executive Order

## Question: Are the reciprocal tariffs inclusive of previous Generalized System of Preferences (GSP)? Or are they in addition? For example, Thailand was 5.5 percent, should we at this point add that on top of the reciprocal tariff or is it included?

**Answer:** The reciprocal tariff is in addition to existing tariff rates. That said, the broader 10 percent tariffs that went into effect on April 5th are included in the reciprocal rate. For example, the rate for Thailand as of April 9th will include that initial 10 percent for a total rate of 37 percent and the existing 5.5 percent rate would be in addition to the new tariffs.

## PART IV: DETERMINING COUNTRY OF ORIGIN FOR TARIFF PURPOSES

### Question: If we purchase polished stones in the U.S., and send them to Thailand for setting, is the country of origin, U.S. or Thailand?

**Answer:** Because the setting of the polished stones into jewelry is a significant manufacturing process taking place in Thailand, Thailand may be considered the country of origin of the finished jewelry for tariff purposes. However, this may depend on the nature of the transformation and the country of origin of the components. Our understanding is that U.S. origin goods returned are generally not subject to the reciprocal tariffs, it could depend on the specifics of the situation.

### Question: We ship goods to Europe to customers and sometimes they select some and send back the rest. Will we be charged tariffs on these return shipments?

**Answer:** It depends. In order to determine if you will be charged tariffs on the return shipments, you need to identify the country of origin of the goods that were initially shipped to Europe. If they were of foreign origin, they will likely be subject to the new U.S. tariffs upon return. If they were of U.S. origin, they might be exempt as “American goods returned”. We recommend consulting a customs broker to determine the specific tariff implications based on the nature and origin of your goods and the circumstances of their return.



**Question: How are we going to prove the country of origin and polishing?**

**Answer:** Members of the trade will need to use existing documentation such as invoices, purchase orders, Kimberley Process Certificates and other tools to show proof of origin.

## PART V: FREE TRADE ZONES AND AGREEMENTS

**Question: Are free trade zones impacted by the tariffs?**

**Answer:** Yes, our understanding based on various sources is that free trade zones are not exempt to the new tariffs.

**Question: Have you heard any information regarding how trade agreements like the African Growth and Opportunity Act (AGOA) and The Dominican Republic-Central America FTA (CAFTA-DR) are affected by the new tariffs?**

**Answer:** Our understanding is that current free trade agreements like AGOA and CAFTA-DR would typically mitigate or eliminate existing tariffs, but they would not avoid the new reciprocal tariffs on a given country. This could change as negotiations continue.

## PART VI: CALCULATION AND APPLICATION OF TARIFFS

**Question: If we placed an order before the tariffs were implemented, but it was delivered afterward, will the new tariff be included?**

**Answer:** Our understanding is that the tariffs will be applied based on the date of entry of the merchandise into the U.S., not the date the order was placed.

**Questions: Will tariffs be applied on landing cost or the wholesale costs?**

**Answer:** Our understanding based on other resources is that the primary basis for tariff calculation is the value of the goods at the time of import, which is usually the wholesale cost at which you purchased them for export to the U.S.

## PART VII: TEMPORARY IMPORTATION OF GOODS

**Question: Hearing many conflicting opinions about memo items, items brought in as samples for trade shows only - treatment under tariff as opposed to carnet - is there any clarity yet?**

**Answer:** The industry and associations like Jewelers of America are working to get more clarity on how standard industry practices like memo and shipping goods for trade shows will be impacted by the tariffs. In some cases, importers may be able to use the following:



- **ATA Carnets:** According to U.S. Customs and Border Protection an ATA Carnet is an international customs document which allows an individual traveler/business to temporarily export or import goods for commercial purposes to and from a country without having to pay duty or value-added taxes on the goods. ATA Carnets serve as a guarantee for signatory countries against the payment of customs duties that may become due on goods that are not re-exported as required. "ATA" stands for the combined French and English words "Admission Temporaire – Temporary Admission." Carnets can be used to temporarily import goods to solicit orders but not to sell the goods during a trade show.
- **Temporary Importation Bonds (TIBs)** may be another option for temporarily importing goods for certain purposes, such as grading. A TIB allows goods to be imported temporarily without paying duty if they are exported within one year (can be extended up to three years). This can be used for purposes like grading or trade shows, but the goods cannot be sold in the U.S. and must be re-exported under customs supervision. According to U.S. Customs and Border Protection, foreign importers who choose to use a TIB to temporarily enter goods into the United States must file U.S. Customs and Border Protection Form (CBPF) 3461, "Entry/Immediate Delivery," or 7501, "Entry Summary" to clear their shipment.

Jewelers of America will continue to monitor for further updates from official sources regarding the treatment of trade show samples under these new tariff regulations. Consulting with a customs broker is advisable for specific situations.

### **Question: How do the tariffs impact merchandise that is already overseas on consignment and waiting to be returned back to the U.S.?**

**Answer:** It depends on the country of origin of the merchandise. If it is of U.S. origin, it may be exempt from the reciprocal tariffs upon return. However, duties on any foreign processing might still apply. If it is of foreign origin, it will likely be subject to the applicable tariffs based on its country of origin.

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**Jewelers of America will continue to monitor the tariffs and their impact on the jewelry industry. We'll be sharing more information on our website, [Jewelers.org](http://Jewelers.org), as it becomes available.**

### **\* Disclaimer**

The information provided herein is solely intended for general informational purposes only. This information does not constitute legal advice and is not intended as such. It is not a substitute for obtaining legal advice from a qualified attorney. You should not act upon such information without seeking qualified professional counsel.

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