



25 April 2025

The President  
The White House  
1600 Pennsylvania Avenue NW  
Washington, DC 20500

Dear Mr. President,

The Automotive Recyclers Association and the Automotive Recyclers of Canada respectfully requests that used automobile parts harvested from end-of-life motor vehicles be exempted from the recently imposed tariffs under Section 232 of the Trade Expansion Act of 1962. Many U.S. and Canadian vehicle owners rely on the ability to repair their vehicles with affordable used automobile parts coming from automotive recycling facilities – this is especially true when considering the bi-directional trade between the U.S. and Canada.

Used automobile parts should be exempted from the recently imposed tariffs by the Presidential Proclamation, *Adjusting Imports of Automobiles and Automobile Parts Into the United States* (90 Fed. Reg. 14,705 (Apr. 3, 2025), for the following reasons:

- (1) It is impracticable for automotive recyclers to identify specific used automobile parts harvested from vehicles that qualify for preferential treatment under the USMCA.
- (2) It is impracticable to adequately value the used automobile parts subject to tariffs due to the subjective nature of used automobile parts and their unique conditions and mileage.
- (3) Without an exemption to tariffs, the import of used automobile parts containing critical minerals will decrease, which will cause a reduction in the reclamation of critical minerals within the U.S. to support new manufacturing.

The Automotive Recyclers Association has represented the professional automotive recycling industry since 1943 and the Automotive Recyclers of Canada has been the voice of the Canadian automotive recycling industry since 1995. Automotive recyclers have long played a pivotal role in the North American supply chain dating back to World War II. Each year, automotive recycling facilities acquire the majority of the 12 to 20 million vehicles reaching end-of-life, offering affordable used replacement parts that lower vehicle ownership costs and enhance domestic access to transportation. The automotive recycling industry is an important economic driver that employs 140,000 Americans at more than 9,000 facilities across the U.S. and Canadian automotive recyclers employ and support over 16,000 jobs and over 1,200 facilities.

Respectfully,

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Executive Director  
Automotive Recyclers Association (ARA)

*Emil Nusbaum*  
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VP, Government Affairs  
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