

## NEWS FLASH

# TRADE POLICY UPDATE:

## Hundreds of Additional Steel & Aluminum Items Now Facing Section 232 Tariffs

On August 18, 2025, the U.S. Bureau of Industry and Security (BIS) significantly expanded the scope of the Section 232 steel and aluminum tariffs. A total of 407 new HTSUS classifications have been added to the list of “derivative products” subject to a 50% additional duty based on steel or aluminum content.

- **Effective Date:** Applies to goods entered for consumption, or withdrawn from warehouse for consumption, on or after 12:01 a.m. EDT, August 18, 2025.
- **No In-Transit Exception:** Unlike prior tariff implementations, shipments already on the water do not qualify for relief.
- **Steel/Aluminum content subject to Section 232** are **NOT** subject to reciprocal tariffs.
- **Non-Steel/Aluminum content** that are not subject to 232 tariff **ARE** subject to applicable country-specific reciprocal tariffs.
- **Products of Russian origin** remain subject to a 200% duty.

- **Origin Requirements:**
  - **Aluminum:** Smelt-and-cast rules apply.
  - **Steel:** Melt-and-pour rules apply.
- **Importers may not claim duty drawback** on Section 232 tariffs.

**Sources:** U.S. Customs and Border Protection. (n.d.). Section 232 tariffs or steel and aluminum frequently asked questions. U.S. Department of Homeland Security. <https://www.cbp.gov/trade/programs-administration/entry-summary/232-tariffs-aluminum-and-steel-faqs>

U.S. Customs and Border Protection. (2025, August 18). CSMS #65936615 – Guidance: Section 232 additional aluminum derivative tariff inclusion products. U.S. Department of Homeland Security. [https://content.govdelivery.com/bulletins/gd/USDHSCBP-3ee1ce7?wgt\\_ref=USDHSCBP\\_WIDGET\\_2](https://content.govdelivery.com/bulletins/gd/USDHSCBP-3ee1ce7?wgt_ref=USDHSCBP_WIDGET_2)

U.S. Customs and Border Protection. (2025, August 18). CSMS #65936570 – Guidance: Section 232 additional steel derivative tariff inclusion products. U.S. Department of Homeland Security. [https://content.govdelivery.com/bulletins/gd/USDHSCBP-3ee1cba?wgt\\_ref=USDHSCBP\\_WIDGET\\_2](https://content.govdelivery.com/bulletins/gd/USDHSCBP-3ee1cba?wgt_ref=USDHSCBP_WIDGET_2)

Federal Register. (2025, August 19). Adoption and procedures of the Section 232 steel and aluminum tariff inclusions process. <https://www.federalregister.gov/documents/2025/08/19/2025-15819/adoption-and-procedures-of-the-section-232-steel-and-aluminum-tariff-inclusions-process>

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