

Section 232 Steel & Aluminum, Tariff Deadlines, CIT Litigation & Emerging U.S. Trade Deals

PRESENTED BY

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WHAT SHOULD ALL IMPORTERS BE DOING?

- **Improve supply chain transparency**
- Review and document country of origin
- Confirm HTS classifications
- Ensure Customs values are correct
- Monitor trade developments and in-transit shipments
- Leverage data
- Audit import entries
- Work on sourcing options to reduce tariff impact
- Consider Bonded, FTZ Warehousing, Drawback

WHAT SHOULD IMPORTERS WITH STEEL/ALUMINUM BE DOING?

Review and document country of smelt/cast and melt/pour

Obtain values of steel or aluminum content

CURRENT TARIFF LANDSCAPE



Country (products of)	Products Covered	Tariff / Fee	Date	Implementation
China/Hong Kong	All	20%	3/4/2025	IEEPA Fentanyl
Canada	All, except USMCA products	25% Overall / 10% Energy & Potash	3/4/2025	IEEPA Fentanyl
Mexico	All, except USMCA products	25% Overall / 10% Potash	3/4/2025	IEEPA Fentanyl
Global	Steel & Aluminum & Derivatives	25% (50% for Turkey)	3/12/2025	Section 232
Global	Steel & Aluminum & Derivatives	50% (25% for UK)	6/4/2025	Section 232
Global	Certain Autos	25% (For USMCA – 25% on non-US content)	4/3/2025	Section 232
All Except China, Canada, and Mexico	All, with some exceptions	10% Baseline Reciprocal	4/5/2025	IEEPA Reciprocal
China	All, with some exceptions	125%–34% 10%	5/14/2025 (Pause is up Aug 12)	IEEPA Reciprocal
Global	Certain Auto Parts	25% (0% for USMCA qualifying)	5/3/2025	Section 232
Country-Specific	All, with some exceptions	Country-Specific Reciprocal Rate	4/9/2025 Suspended (90 days is up July 9)	IEEPA Reciprocal
Global	China's Maritime, Logistics, and Shipbuilding Sectors	TBD, currently in comment period for proposed changes	Tentative 10/14/2025	Section 301
Global	Copper, Pharmaceuticals Agriculture, Semiconductors, Lumber, Timber & Derivatives, Commercial Aircraft, Engines, Parts, Critical Minerals, Heavy-duty trucks and parts	TBD	TBD	Section 232
Countries Importing Venezuelan Oil	All	25%	TBD, no updates	IEEPA

Updates on U.S.-China Trade – Pending Finalization

High-level negotiations in London, concluded on June 10, 2025, have produced a framework agreement with China, pending final approval from Presidents Trump and Xi. The deal stabilizes trade relations, with minor issues remaining, particularly around China's rare earth export controls. The U.S. seeks guaranteed semiconductor supply access to counter China's leverage.

The agreement builds on the May 2025 Geneva consensus and includes the following tariff structure on Chinese imports:

- **10%** reciprocal tariff, applied to Chinese goods under the International Emergency Economic Powers Act (IEEPA), effective April 5, 2025.
- **20%** tariff on specific Chinese imports, tied to China's efforts to curb fentanyl precursor shipments to the United States, implemented in February 2025.
- **7.5% - 25%** tariff on certain goods under existing Section 301 provisions, targeting unfair trade practices such as intellectual property theft.



AUGUST 12 IS THE END OF THE RECIPROCAL TARIFF REDUCTION FOR CHINA

Rates return to 34% (instead of 10%) for reciprocal tariffs, without further change

U.S. & UK Economic Prosperity Deal: Published 6/23/25

Commodity	Effective Date	Tariff Rate	Action	Detail
UK Auto	<p>The tariff-rate quota shall be adjusted for calendar year 2025 to reflect the General Terms' operative date of May 8, 2025.</p> <p>The quota shall be effective 7 days after the publication of this order in the Federal Register (published June 23, 2025)</p>	<p>2.5% MFN +</p> <p>7.5%</p>	Tariff Rate Quota	<p>For products of the UK, a tariff-rate quota of 100,000 automobiles is established for automobiles as classified in heading 8703 (specified in note 33(b) to subchapter III of CH 99.</p> <p>Imports in excess will be tariffed under the general Section 232 rates.</p>
UK Auto Parts	<p>Within 7 days of the date of publication of this order in the Federal Register, the Secretary of Commerce, in consultation with the ITC and CBP, shall publish a notice in the Federal Register to modify the HTS (published June 23, 2025)</p>	<p>10%</p> <p>25%</p>	Tariff Decrease	<p>Auto parts specified in note 33(g) to subchapter III of chapter 99 are subject to 10% tariff instead of Section 232 25% rate – provided they are products of the UK and they are intended for use in automobiles that are products of the UK.</p>
UK Aerospace	<p>Within 7 days of the date of publication of this order in the Federal Register, the Secretary, in consultation with ITC and CBP, shall publish a notice in the Federal Register modifying the HTSUS consistent with this section, if necessary.</p>	<p>Reciprocal, and Section 232 Steel and Aluminum do not apply</p>		<p>For products of the UK that fall under the World Trade Organization Agreement on Trade in Civil Aircraft.</p>
UK Steel / Aluminum & Derivatives	<p>June 4, 2025</p>	<p>25%</p> <p>50%</p>	Tariff Decrease until July 9 th	<p>Tariff-rate quota to be established, imports in excess will be tariffed under the general Section 232 rates.</p> <p>After July 9, the tariff rate may be adjusted at the discretion of the Secretary of Commerce consistent with the terms of Deal, or if it is determined the U.K. has not complied with the relevant aspects of the Deal, adjust the applicable duty rates to 50%.</p>
UK Pharma	<p>The United States and the United Kingdom committed to negotiate significantly preferential treatment outcomes on pharmaceuticals and pharmaceutical ingredients that are products of the United Kingdom, contingent on the findings of an investigation regarding pharmaceuticals and pharmaceutical ingredients under section 232, and provided that the United Kingdom complies with certain supply chain security standards.</p>			

Baseline tariff of 10% remains

Updates on U.S. - India Mission 500 Framework

India-U.S. trade deal faces hurdles as India resists lower-duty imports of U.S. agricultural products, fearing impact on farmers and GM food concerns.

Disagreements persist over tariffs, market access for genetically modified crops, medical devices, and data localization, hindering progress towards an agreement.

A U.S. trade team led by Brendan Lynch, Assistant U.S. Trade Representative, met officials in New Delhi on June 5–10. Indian officials said earlier this week that both sides agreed to expedite talks to conclude an agreement that includes “early wins.”

**THE JULY 9 DEADLINE
LOOMS WITH A
POTENTIAL FOR 26%
COUNTRY-SPECIFIC
RECIPROCAL TARIFFS**

Reciprocal Tariffs: **90-day pause is up July 9th***



Country (products of)	Tariff	Country (products of)	Tariff	Country (products of)	Tariff
Lesotho	50%	North Macedonia	33%	Israel, Zambia, Malawi, Philippines	17%
Cambodia	49%	Taiwan, Indonesia, Angola, Fiji	32%	Mozambique	16%
Laos	48%	Switzerland, Moldova, Libya	31%	Norway, Venezuela	15%
Madagascar	47%	South Africa, Algeria, Nauru	30%	Nigeria	14%
Vietnam	46%	Pakistan	29%	Democratic Republic of the Congo, Cameroon	11%
Sri Lanka, Myanmar (Burma)	44%	Tunisia	28%	<p>All Other Countries = 10% Baseline Tariff</p> <p>For articles with at least 20% U.S. content, reciprocal tariffs can be based on the value of the non-U.S. content.</p> <p>Articles included in Annex II are exempt.</p> <p>Some exemptions are available for CH98, informational materials, donations, etc.</p> <p>https://www.whitehouse.gov/wp-content/uploads/2025/04/Annex-II.pdf</p> <p>*China date is August 12th</p>	
Falkland Islands, Syria	41%	Kazakhstan	27%		
Mauritius	40%	India	26%		
Iraq	39%	South Korea	25%		
Guyana	38%	Japan, Malaysia, Brunei	24%		
Bangladesh, Serbia, Botswana, Liechtenstein	37%	Vanuatu	22%		
Thailand	36%	Côte d'Ivoire, Namibia	21%		
Bosnia and Herzegovina	35%	European Union, Jordan	20%		
China/Hong Kong/Macau*	34%	Nicaragua, Zimbabwe	18%		

IEEPA Reciprocal Tariffs: 90-Day Update

Country-specific reciprocal tariffs above 10% are due to return on July 9th (all countries except China, which is August 12th).

According to reports, many trading partners that account for the largest portion of the trade deficit have come up with reasonable offers.

We may see supply chain challenges as the 90-day pause on reciprocal tariff increases has resulted in many companies rushing cargo, leading to empty container shortages and limited vessel capacity. This has also led to congestion at ports and rate increases.

Treasury Secretary Scott Bessent said that if 18 major trading partners negotiate in good faith, “it is highly likely ... we will roll the date forward to continue in good faith negotiations. If someone is not negotiating, then we will not.”

According to Kevin Hassett, director of the White House National Economic Council, “We know that we’re very close to a few countries and are waiting to announce after we get the Big Beautiful Bill closed.”

IEEPA Legal Update



LAWSUIT UPDATES

In April, two companies filed a lawsuit in the D.C. U.S. District Court, arguing that the President does not have the authority to impose tariffs under IEEPA. In May, the court agreed and held that the government could not enforce the tariffs, but only for the two plaintiffs who filed the suit. In June, the Government appealed to the U.S. Court of Appeals, where the case is pending, and the ruling remains on hold.

The plaintiffs petitioned the Supreme Court directly, seeking to bypass the Appeals Court to challenge whether the President exceeded his authority in implementing the global tariff plan. The *Learning Resources v. Trump* case continues to draw attention, with the Appeals Court's stay allowing tariffs to remain in effect.

The Department of Justice is preparing a robust defense, arguing that IEEPA grants broad presidential authority. Growing business coalitions, including toy and retail associations, may join the suit, potentially increasing pressure on the Supreme Court to consider an expedited review despite its term ending soon.

CONGRESSIONAL PUSHBACK

Bipartisan senators introduced a bill to limit presidential tariff authority, citing economic disruption.

This signals rising political friction, with moderate Republicans joining Democrats in criticizing the tariff plan's scope.

IEEPA Legal Update

TARIFF LITIGATION



Two federal courts recently struck down sweeping tariffs that the Trump Administration had recently imposed under the International Emergency Economic Powers Act (IEEPA).

The CIT panel unanimously ruled that the president's actions to impose tariffs under IEEPA are unlawful, and it granted a nationwide permanent injunction to legally bar the government from collecting the tariffs.

Importantly, the CIT **did not** conclude that the president lacks authority under IEEPA to impose tariffs *as a general matter*; instead, how these were implemented created leverage for other issues, but the tariffs do not deal with these issues directly.

Injunctions invalidating the IEEPA tariffs are **currently stayed**, and **importers are required to continue paying tariffs for now**.

The Administration's battle to uphold the IEEPA tariffs is far from over, and we expect that the appeals may reach the Supreme Court.

Even if the Supreme Court ultimately blocks the tariffs, the Trump Administration may advance its tariff agenda to other legal authorities, such as Section 122, 338, 301, or 232.

Other News

DE MINIMIS SPECULATION – We may see different maximum value levels set by country.

The Mexican Government reported a 165% surge of **new foreign direct investment** into the country in Q1 2025, driven by tariff fears. Sectors like automotive and electronics led the trend.

CHINA, THE EU, AND CANADA RETALIATORY TARIFFS

- A June 19, 2025, Reuters report cites EU plans for 25% tariffs on U.S. whiskey and soybeans if the 50% tariff threat materializes, which could escalate trade conflicts post-July 9.
- Canada is preparing new and revised tariffs, including tariff rate quotas, to be adopted over the coming weeks.
- China has approved license applications for limited exports of rare earth minerals.

Trade agreements with Haiti (HOPE/HELP) and the AGOA (African Growth and Opportunity Act) are set to expire Sept 30 without approved continuance.

INTEREST RATES REMAIN STATIC

TARIFF STACKING NEW PRIORITY ORDER

EFFECTIVE JUNE 4, 2025

Tariff Priority Order	Action	Details
1 Section 232 Auto & Auto Parts	First, determine if an article is subject to the 232 Auto/Auto Parts tariff. If so, then the article IS NOT subject to the 232 Aluminum, 232 Steel, IEEPA Canada, or IEEPA Mexico tariff.	232 Auto/Auto Parts - Proclamation 10908 of March 26, 2025(Adjusting Imports of Automobiles and Automobile Parts into the United States), as amended;
2 Section 232 Aluminum	Next (if the article is not subject to the 232 Auto/Auto Parts tariff), determine if an article is subject to the 232 Aluminum and/or 232 Steel tariff.	232 Aluminum - Proclamation 9704 of March 8, 2018 (Adjusting Imports of Aluminum into the United States), as amended;
3 Section 232 Steel	For derivative products subject to both the 232 Aluminum and 232 Steel tariffs, duties will be owed on both the value of the aluminum and steel content of that product.	232 Steel - Proclamation 9705 of March 8, 2018 (Adjusting Imports of Steel into the United States), as amended;
4 IEEPA Canada	If the article is subject to the 232 Aluminum and/or 232 Steel tariffs, as well as the IEEPA Canada or IEEPA Mexico tariffs, then it is NOT subject to the IEEPA Canada or IEEPA Mexico tariffs.	International Emergency Economic Powers Act (IEEPA) Canada - Executive Order 14193 of February 1, 2025 (Imposing Duties to Address the Flow of Illicit Drugs Across Our Northern Border), as amended;
5 IEEPA Mexico	Applies if the above tariffs do not.	IEEPA Mexico - Executive Order 14194 of February 1, 2025 (Imposing Duties to Address the Situation at Our Southern Border), as amended.

1. Importers or filers should calculate duties in the above order, understanding that 232 Steel and 232 Aluminum may apply to the same article.
2. Parts of passenger vehicles and light trucks that qualify for preferential treatment under the United States-Mexico-Canada Agreement (USMCA), ARE NOT subject to the 232 Auto/Auto Parts, the IEEPA Canada, or the IEEPA Mexico tariffs.
3. Aluminum and aluminum derivative products from Russia, and imports of such aluminum products from any country containing aluminum smelt or cast in Russia, ARE subject to the corresponding Section 232 duty rate of 200 percent.
4. Articles that qualify for preferential tariff treatment under USMCA ARE NOT subject to the IEEPA Canada or IEEPA Mexico tariffs.
5. "Subject to" means that a duty of more than 0% is owed under the tariff action.

WHEN DO RECIPROCAL TARIFFS APPLY?

Type of Import	Reciprocal Tariff Applies	Reciprocal Tariff Does Not Apply	Notes
Subject to Section 232 Auto/Auto Parts		X	All automobiles and automotive parts subject to the additional duties imposed pursuant to section 232 of the Trade Expansion Act of 1962, as amended, and proclaimed in Proclamation 10908 of March 26, 2025 (Adjusting Imports of Automobiles and Automobile Parts Into the United States)
Subject to Section 232 Aluminum Steel	X	X	NEW: Reciprocal tariff applies to declared non-steel or non-aluminum value
Product of Canada or Mexico		X	If other IEEPA orders are terminated, IEEPA reciprocal tariff (12%) may apply.
Merchandise classified in HTS Listed in Annex II of EO 14257 (reciprocal tariff policy)		X	https://www.federalregister.gov/documents/2025/04/07/2025-06063/regulating-imports-with-a-reciprocal-tariff-to-rectify-trade-practices-that-contribute-to-large-and Including copper, pharmaceuticals, semiconductors, lumber articles, certain critical minerals, and energy and energy products
Merchandise classified in HTS Listed in EO 14257 (electronics)		X	https://www.whitehouse.gov/presidential-actions/2025/04/clarification-of-exceptions-under-executive-order-14257-of-april-2-2025-as-amended/
Articles from a trading partner subject to the rates set forth in Column 2 of the Harmonized Tariff Schedule of the United States (HTSUS)		X	Products of Cuba, North Korea, Russia, and Belarus (Column 2 countries)
A product with at least 20% of the value is U.S. originating	X		Applies to non-U.S. Content. For the purposes of this subsection, "U.S. content" refers to the value of an article attributable to the components produced entirely, or substantially transformed in, the United States. CBP may perform verification.
Certain exemptions for CH 98, informational materials, etc.		X	
Imports not meeting the criteria above	X		

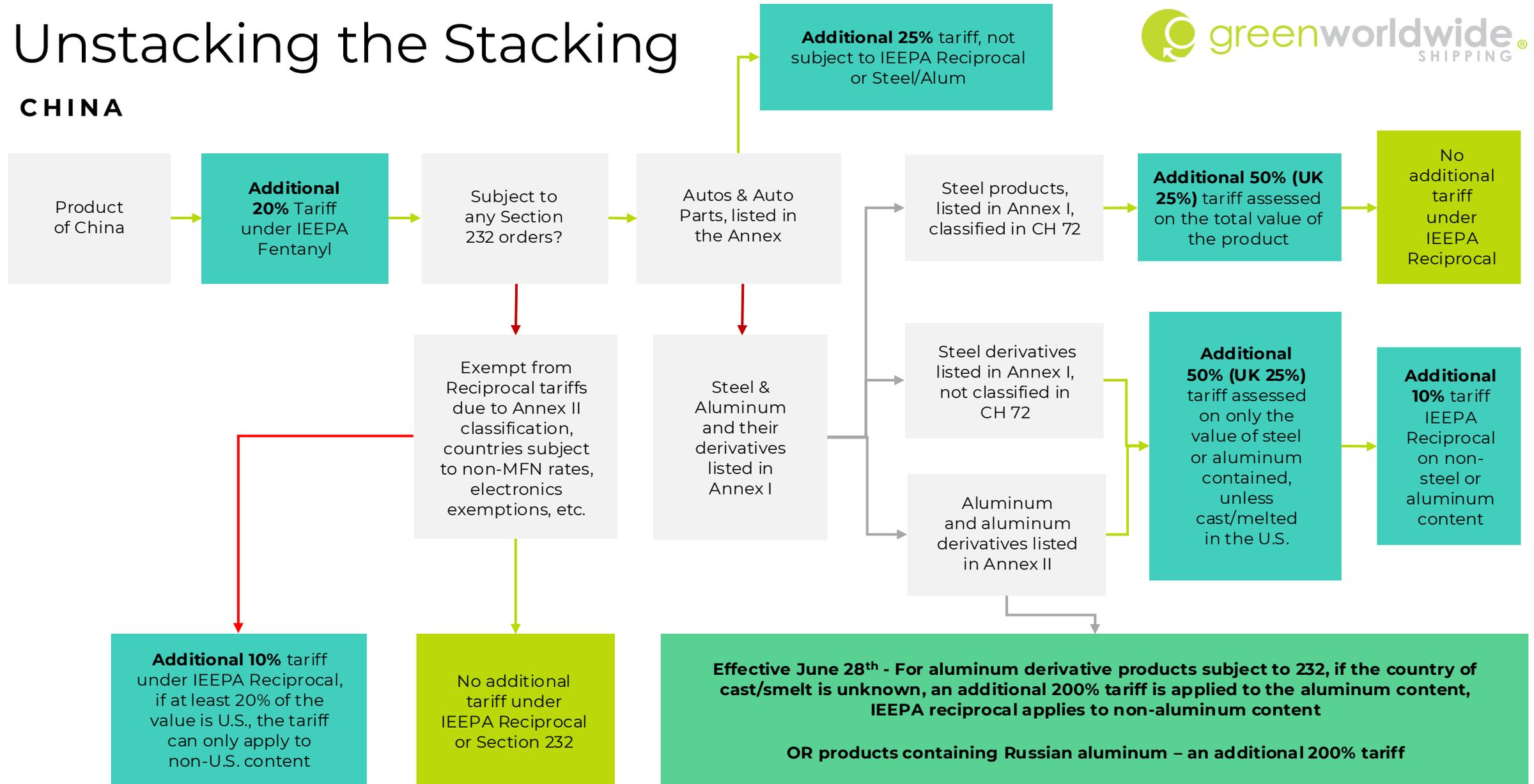
"Subject to" means more than 0% duty is owed under the tariff action.

Country-specific rates are paused until July 9th.

Currently, a 10% baseline tariff applies if products are subject to reciprocal tariffs.

Unstacking the Stacking

CHINA



Tariff Stacking Scenarios

CHINA



Description	Section 301	Section 232	IEEPA Fentanyl	Reciprocal	Total Additional Tariffs	Comments
A product without Section 301/232	0%	0%	20%	10%*	30%	+MFN rate, or any other measures
A product with Section 301 (7.5%) but no Section 232	7.5%	0%	20%	10%*	37.5%	+MFN rate, or any other measures
A product without Section 301, with Section 232 Steel/Alum	0%	50%	20%	Applies to value of non-Section 232, if applicable	70%+	+MFN rate, or any other measures
A product with Section 301 (7.5%) and Section 232 Steel/Alum	7.5%	50%	20%	Applies to value of non-Section 232, if applicable	77.5%+	+MFN rate, or any other measures
A product with Section 301 (25%) but no Section 232	25%	0%	20%	10%*	55%	+MFN rate, or any other measures
A product with Section 301 (25%) and Section 232 Steel/Alum	25%	50%	20%	Applies to value of non-Section 232, if applicable	95%+	+MFN rate, or any other measures

Unless exempt
 Static (some exemptions)
 Conditional (product-based)
 +MFN rate, or any other measures
 Reciprocal tariffs apply to non-Section 232 value, if applicable
 +Total depends on if value is split for Section 232 or not

Section 232 | Steel & Aluminum



STEEL OF HTS CHAPTER 72

If included, 50% on total value of the merchandise

STEEL OF HTS CHAPTER 73

If included, 50% on value of steel content – reciprocal tariff applies to the non-steel value

DERIVATIVES OUTSIDE OF HTS CHAPTER 73/76

If included, 50% on the value of steel/aluminum content - reciprocal applies to the non-steel value

ALUMINUM OF CHAPTER 76

If included, 50% on either the total value of the merchandise or the aluminum content, depending on the HTS subheading, reciprocal applies to the balance if needed.

To have the 50% tariff assessed on the value of the aluminum or steel contained in the product, the value and quantity of steel/aluminum contained in the article must be provided at the time of entry.

For **derivative steel**, ISO country of melt/pour is required; OTH (other) is for “other countries.”

According to CBP FAQ – filers can report OTH if unknown

Non-derivative products - mandatory ISO country

For **derivative aluminum**, ISO country of cast/smelt is required –

If the country of cast/smelt is unknown, report “UN”(unknown) - default to Russia tariff rates at 200% - effective 6/28/2025

EFFECTIVE DATE: JUNE 4, 2025 **NO DRAWBACK IS AVAILABLE**

Section 232 | New Steel Derivatives

NEW DERIVATIVES OUTSIDE OF HTS CHAPTER 73

50% (25% UK) on the value of steel/aluminum content

- (1) combined refrigerator-freezer under HTSUS subheading 8418.10.00
- (2) small and large dryers under HTSUS subheadings 8451.21.00 and 8451.29.00
- (3) washing machines under HTSUS subheadings 8450.11.00 and 8450.20.00
- (4) dishwashers under HTSUS subheading 8422.11.00
- (5) chest and upright freezers under HTSUS subheadings 8418.30.00 and 8418.40.00
- (6) cooking stoves, ranges, and ovens under HTSUS subheading 8516.60.40
- (7) food waste disposals under HTSUS subheading 8509.80.20; and
- (8) welded wire rack under statistical reporting number 9403.99.9020

(Note that HTSUS 9403.99.9020 is also subject to Section 232 measures on aluminum derivatives articles per Proclamation 10895)



**EFFECTIVE DATE:
JUNE 23, 2025**

**NO DRAWBACK
IS AVAILABLE**

**RECIPROCAL
TARIFF APPLIES
TO THE NON-
STEEL VALUE**

To have the 50% tariff assessed on the value of the aluminum or steel contained in the product, the value and quantity of steel/aluminum contained in the article must be provided at the time of entry.

EXAMPLE
Household Dishwasher

HTS
8422.11.0000

Country of
Origin: China

Import Value:
\$200/each

Steel Value:
\$60/each (30%)

Section 301 - 9903.88.15 - $\$200 \times 7.5\% = \15.00

IEEPA Fentanyl - 9903.01.24 - $\$200 \times 20\% = \40.00

Section 232 - 9903.81.91 - (All countries except the United Kingdom): Derivative iron or steel products listed in subdivision (n) (certain steel derivative articles not classified in Chapter 73 subject to Section 232): the import duty is on the value of the steel content = $\$60 \times 50\% = \30.00

IEEPA Reciprocal - 9903.01.25 - Non-Steel Derivative Value - $\$140 \times 10\% = \14.00

Standard - 8422.11.0000 - 2.4% MFN $\$200 \times 2.4\% = \4.80

Total due (excluding HMF, MPF, ADD/CVD, other measures or any quota) **\$103.80**

EXAMPLE
Rowing Machine

HTS
9506.91.0020

Import Value:
\$300/each

Country of Origin: UK

Aluminum Value:
\$240.00/each (80%)

IEEPA Reciprocal (9903.01.25)
Non-Aluminum Value is
 $\$60 \times 10\% = \mathbf{\$6.00}$

Country of cast/smelt = UK
Section 232 (9903.85.15)
Tariff is on the value of the
aluminum content =
 $\$240 \times 25\% = \mathbf{\$60.00}$

Standard 9506.91.0020
4.6% MFN rate is
 $\$300 \times 4.6\% = \mathbf{\$13.80}$

Total due = **\$79.80/each***

Country of Origin: DE

Aluminum Value:
Unknown

IEEPA Reciprocal
N/A

Country of cast/smelt = DE
Section 232 (9903.85.08)
Tariff is on the value
of whole product =
 $\$300 \times 50\% = \mathbf{\$150.00}$

Standard 9506.91.0020
4.6% MFN rate
 $\$300 \times 4.6\% = \mathbf{\$13.80}$

Total due = **\$163.80/each***

Country of Origin: UK

Aluminum Value:
\$240.00/each (80%)

IEEPA Reciprocal
N/A

Country of cast/smelt = Unknown
Section 232 (9903.85.68)
Tariff is on the value
of whole product =
 $\$300 \times 200\% = \mathbf{\$600.00}$

Standard 9506.91.0020
4.6% MFN rate
 $\$300 \times 4.6\% = \mathbf{\$13.80}$

Total due = **\$613.80/each***

*Excluding HMF, MPF, ADD/CVD, any quota



Trade

Basic Importing and Exporting

Section 232 Tariffs on Steel and Aluminum Frequently Asked Questions

[Trade Remedy Contact Information and Resources](#)

For derivatives of steel and aluminum subject to 232, do importers pay Section 232 tariff on the derivative value and remain exempt from reciprocal tariffs for the balance of the value that is not subject to Section 232?

Articles and derivatives of steel and aluminum subject to Section 232 duties are excluded from the reciprocal tariffs; pursuant to heading 9903.01.33, HTSUS. Refer to [90 FR 15041 \(Apr. 7, 2025\)](#) and CSMS # [64680374](#) and # [64701128](#).

For derivatives of steel and aluminum subject to 232, do importers pay Section 232 tariffs on the derivative value and remain exempt from reciprocal tariffs for the balance of the value that is not subject to Section 232?

Updated 6/11/2025. Articles and derivatives of steel and aluminum subject to Section 232 duties are excluded from the reciprocal tariffs; pursuant to heading 9903.01.33, HTSUS. Refer to [90 FR 15041 \(Apr. 7, 2025\)](#) and CSMS # [64680374](#) and # [64701128](#).

REFERENCE GUIDE

Section 232 Steel

UPDATED JUNE 13, 2025

New and/or additional tariffs were issued under Section 232 for imports of certain steel and aluminum items and their derivatives, **effective June 4th, 2025.**

Section 232 Tariffs for steel products and their derivatives are now 50% (25% for the United Kingdom) as listed in the below Federal Register Notice.

[Federal Register : Adjusting Imports of Aluminum and Steel Into the United States](#)

For all items included in Steel Section 232 Tariff Measures

You must report the country of melt/pour for the article imported. Impacted products can fall into four classification categories:

If you have items that are steel/iron derivatives Section 232 list (subdivision "j") on the FR Notice / Section 232 HTS 9903.81.87/ HTS listed below and subdivision "q" for HTS 9903.81.94 for goods of UK-origin – the 50% (25% for UK) applies to imports of covered products, other than products of the United States, assessed on the total value of steel content.

- Flat-rolled products provided for in headings 7208, 7209, 7210, 7211, 7212, 7225 or 7226
- Bars and rods provided for in headings 7213, 7214, 7215, 7227, or 7228
- Angles, shapes and sections of 7216 (except subheadings 7216.61.00, 7216.69.00 or 7216.91.00)
- Wire provided for in headings 7217 or 7229
- Sheet piling provided for in subheading 7301.10.00
- Rails provided for in subheading 7302.10
- Fish-plates and sole plates provided for in subheading 7302.40.00
- Other products of iron or steel provided for in subheading 7302.90.00
- Tubes, pipes, and hollow profiles provided for in heading 7304 or 7306
- Tubes and pipes provided for in heading 7305
- Ingots, other primary forms and semi-finished products provided for in headings 7206, 7207 or 7224
- Products of stainless steel provided for in headings 7218, 7219, 7220, 7221, 7222 7223.

Any reference above to iron or steel products classifiable in any heading or subheading of chapter 72 or 73, as the case may be, shall mean that any good provided for in the article description of such heading or subheading and of all its subordinate provisions (both legal and statistical) is covered by the provisions of this note and related tariff provisions.

2

If you have items that are steel/iron derivatives Section 232 list (subdivision "i") on the FR Notice / Section 232 HTS 9903.81.89/ HTS listed below; subdivision "s" for HTS 9903.81.96—goods of UK origin) – the 50% (25% for UK) applies to imports of covered products, other than products of the United States, assessed on the total value of steel content.

- (A) nails, tacks (other than thumb tacks), drawing pins, corrugated nails, staples (other than those of heading 8305) and similar articles, of iron or steel, whether or not with heads of other material (excluding such articles with heads of copper), suitable for use in powder-actuated handtools, threaded (described in subheading 7317.00.30)
- (B) nails, tacks (other than thumb tacks), drawing pins, corrugated nails, staples (other than those of heading 8305) and similar articles, of iron or steel, whether or not with heads of other material (excluding such articles with heads of copper), of one piece construction, whether or not made of round wire; the foregoing described in statistical reporting numbers 7317.00.5503, 7317.00.5505, 7317.00.5507, 7317.00.5560, 7317.00.5580 or 7317.00.6560 only and not in other statistical reporting numbers of subheadings 7317.00.55 and 7317.00.65
- (C) bumper stampings of steel, the foregoing comprising parts and accessories of the motor vehicles of headings 8701 to 8705 (described in subheading 8708.10.30)
- (D) body stampings of steel, for tractors suitable for agricultural use (described in subheading 8708.29.21)

Country	Tariff Rate
China	190%
India	47.3%
UK	2.3%
USA	56.8%
Mexico	20.8%

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Originally enacted in 1789 as part of the Original Tariff Act, duty drawback is the refund of 99% of the duties, taxes, fees and tariffs paid to Customs and Border Protection on merchandise imported into the United States **that is subsequently exported or destroyed.**

The **U.S. exporter** is initial eligible party to receive drawback but can waive/endorse it **to other parties.**

Duty Drawback is a complex Customs program that is an investment of both time and labor but can reap some incredibly powerful rewards.

With Drawback privileges and complete documentation/data, claims can be made for imports from the past 5 years.

Duty Drawback



ELIGIBLE:

Section 301 Tariffs
IEEPA Reciprocal
Tariffs

INELIGIBLE:

IEEPA Fentanyl Tariffs
Section 232 Tariffs
AD/CVD

Trade Statistics



Trade Enforcement Activities	FY 2024	FY 2025 (Q1) as of March 31	FY 2025 (Q1) as of April 30	April 2025
Number of Audits Completed	417	200	233	33
Total Collected as a result of Importer Audits	\$117.67 million	\$134.16 million	\$152.62 million	\$18.46 million
Net Revenue Recovered due to Entry Summary Reviews (ESF)	\$667.55 million	\$20.31 billion	\$22.68 billion	\$2.37 billion

Import Revenue Collection	FY 2024	FY 2025 (Q1) as of March 31	FY 2025 (Q1) as of April 30	April 2025
Total Import Value for Goods	\$3.36 trillion	\$1.89 trillion	\$2.18 trillion	\$290 billion
Total Entry Summaries	38.3 million	21.43 million	24.78 million	3.35 million
Total Section 321 BOL's and Mail (de minimis)	1.03 billion	664.26 million	763.3 million	99.04 million
Total Duty, Taxes, and Fees Collected*	\$88.07 billion	\$57.05 billion	\$82.13 billion	\$25.08 billion

*Amount includes Estimated and final duties, taxes, and fees paid by the trade community, including adjustments for refunds. Figures are not official statistics of United States. Source: US Customs and Border Protection: Use for monitoring purposes only.

Trade Statistics



Trade Remedy Enforcement	Imported Products	FY 2024	FY 2025 (Q1) as of March 31	FY 2025 (Q1) as of April 30	April 2025
Section 201	Solar Products	\$212.91 million	\$226.82 million	\$253.35 million	\$26.53 million
Section 232	Steel	\$1.26 billion	\$1.08 billion	\$1.26 billion	\$180 million
	Aluminum	\$480.81 million	\$635.48 million	\$766.94 million	\$134.46 million
Section 301 China	China Products	\$38.26 billion	\$22.09 billion	\$23.35 billion	\$1.26 billion
IEEPA - China & Hong Kong	All	-	\$7.89 billion	<i>\$7.89 billion</i>	<i>Stats unchanged as of 6/25</i>
IEEPA - Mexico	All	-	\$2.87 billion	<i>\$2.87 billion</i>	<i>Stats unchanged as of 6/25</i>
IEEPA - Canada	All	-	\$1.04 billion	<i>\$1.04 billion</i>	<i>Stats unchanged as of 6/25</i>
IEEPA – Reciprocal 10%	All	-	\$1.23 billion	<i>\$1.23 billion</i>	<i>Stats unchanged as of 6/25</i>
Section 232 - Automobiles	Auto	-	\$1.15 billion	<i>\$1.15 billion</i>	<i>Stats unchanged as of 6/25</i>
Total		\$40.21 billion	\$37.21 billion	\$39.81 billion (missing new tariffs April data)	\$2.26 billion (missing new tariffs April data)

Source: <https://www.cbp.gov/newsroom/stats/trade>

Are you seeing CBP issue additional penalties with the new Administration?

What are you hearing concerning tariff rates for Indonesia and Vietnam after the pause?

We import hand trucks made of steel and aluminum from Vietnam. Are these types of products affected by the tariffs?

How to make sure we are in compliance?

If a finished good from China has a single aluminum component, does that make it fall under the new 50% aluminum tariff?

Which duties are eligible for refunds?

Regarding the US-UK trade deal, do we know any more about the provisions for auto parts?

What steps should we be taking based on the trade outlook now?

Are there any updates on USMCA?

Questions from the Audience

Thank you for attending

A copy of this presentation will be emailed to all attendees.

Questions submitted in the Q&A module will receive direct responses.

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