



SECTION 232 NATIONAL SECURITY INVESTIGATION ON COPPER IMPORTS (February 26, 2025)

President Trump has issued an [Executive Order](#) (“E.O.”) under Section 232 ordering the Secretary of Commerce to initiate a national security investigation into imports of copper, including raw mined copper, copper concentrates, refined copper, copper alloys, scrap copper, and copper “derivative products.” The E.O. directs an investigation on whether copper articles are being imported into the United States in such quantities or under such circumstances as to threaten or impair national security. A [Fact Sheet](#) has also been issued.

Of key importance is the potential for a broad definition or list of “derivative products,” as is the case with the recent Section 232 steel and aluminum actions.

The E.O. orders Commerce to issue its report within 270 days (November 25, 2025). The E.O. begins a long process. The next step will be dates and deadlines, which will be announced in a subsequent [Federal Register](#) notice, to:

- File comments, requests to appear at a public hearing, and submissions of a summary of expected testimony;
- File rebuttal comments submitted in response to any comments filed; and
- Conduct Public Hearings

The process and timetable is provided for at 19 C.F.R. §§ [705.10](#) and [705.11](#). In the prior 2017-2018 Section 232 steel/aluminum actions, the time between initiation of the investigations and final publication of the Reports was eight (8) months. Presidential Proclamations were issued fifty-six (56) days thereafter, a shorter timetable than the one hundred five (105) days provided in the Customs Regulations.

Please contact [Marshall Miller](#), [Brian Murphy](#), [Sean Murray](#), or [David Ostheimer](#) with questions about the Section 232 action, the potential impact, and/or ways to minimize potential liability including increasing FTZ usage.

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