



**SECTION 232 STEEL/ALUMINUM
DERIVATIVE ARTICLES INCLUSION REQUESTS
WITH SHORT COMMENT PERIOD
(May 22, 2025)**

As discussed in our May 2 [What's New](#) update, a two-week window opened on May 1 for the public to propose new derivative steel and aluminum articles to be subject to 25% additional Section 232 duties. The Section 232 Inclusion Requests, which cover a large number of HTS provisions, were posted for inspection on May 20. The public can submit comments in response to the Section 232 Inclusion Requests through June 4 on the Regulations.gov [website](#).

There were 58 separate Section 232 Inclusion Requests filed proposing the inclusion of 525 unique 8-digit or 10-digit HTSUS provisions, ranging from HTSUS subheadings 0402.99.70 (whipped cream) to 9506.91.0030 (exercise equipment). Identified HTSs include, among other products, paints, refrigerants, perfumes, shaving cream, pesticides, etc. in aerosol cans, pipe fittings, handtools, knives, spoons, forks, hinges, mountings and fittings, rotors, engines and parts, gas turbines, pumps and parts, compressors, air conditioners, freezers, heat exchangers, filtering machinery, dishwashers, cranes, forklifts, bulldozers, HTS 8431 machinery parts, washing machines, dryers, injection molding machines, HTS 8479 residual machines and parts, molds, transmission shafts, bearings, flywheels, electric motors and parts, transformers, stoves, ovens, wires, locomotives and parts, tractors, buses, HTS 8703, 8704, 8705, and 8709 vehicles, chassis, HTS 8708 auto parts, tanks, motorcycles and parts, trailers, cruise ships, furniture, etc. Contact [Brenda Zeller](#) to be provided a spreadsheet of the identified HTS classifications.

Once the comment period ends on June 4, the Secretary of Commerce has 60 days to decide which of the proposed products will be added as derivative steel and aluminum articles subject to 25% Section 232 Steel and Aluminum additional tariffs. We strongly recommend that clients review the HTS classifications and file comments supporting or opposing the Section 232 Inclusion Requests. Given the breadth of HTS classifications, many importers will be impacted if the Section 232 tariff inclusions are approved.

The current notice and comment period is the first of three, two-week comment periods to open each year. The next two-week comment periods begin in September and January.

Please contact [Marshall Miller](#), [Brian Murphy](#), [Sean Murray](#), or [David Ostheimer](#) with questions.

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