



SECTION 232 STEEL & ALUMINUM TARIFF INCLUSIONS PROCESS (May 2, 2025)

The Commerce Department [published](#) an Interim Final Rule, effective April 30, 2025, outlining a new process to add new derivative aluminum and steel products to the lists covered by the Section 232 additional tariffs. Comments on this Interim Final Rule must be received by the Bureau of Industry and Security (BIS) no later than June 16, 2025 and can be submitted through [regulations.gov](https://www.regulations.gov).

Highlights of the new process include:

- There will be three two-week windows annually for interested parties to propose new aluminum and steel derivative articles to be subject to the Section 232 additional tariffs. The two-week submission windows will be at the beginning of May, September, and January each year. The first two-week submission window opened May 1.
- Submissions are made through the email inbox DIBP@bis.doc.gov and require the following:
 - Clear identification of the applicant (i.e., individual, company, or trade association);
 - A precise definition of the derivative article;
 - The eight or ten-digit HTSUS classification requested to be included in the scope of the ad valorem tariffs;
 - An explanation of why the article is a steel or aluminum derivative article, including, to the extent practicable, information on the total value of the article's steel and/or aluminum content as a share of the derivative article's total value;
 - Pertinent information on the domestic industry affected;
 - Statistics on imports and domestic production;
 - A description of how and to what extent imports of the derivative article threaten to impair the national security or otherwise undermine the objectives set forth in the 2018 Steel and Aluminum Section 232 investigation reports or related Inclusions Proclamations; and
 - Any business confidential submissions must also include a non-confidential public version.
 - All information submitted must be limited to 30 pages inclusive of all attachments.

Note that the submission makes the identity of the applicant public and must argue how imports of the derivative product impairs national security or undermines the objectives set forth in the Section 232 reports. The Section 232 [aluminum](#) and [steel](#) reports included factors like increasing imports, import penetration of the U.S. market, import to export ratio, aluminum and steel prices, mill closures, and declining employment.

Once the submission has been filed: (1) there is a 14-day public comment window through [regulations.gov](https://www.regulations.gov); and (2) a 60-day review and decision process begins following the end of the comment period.

For companies interested in adding new products to the derivative products lists or preventing new products from being added, we suggest discussing with us options and

strategy. The window to add new products is currently open, so submissions need to be made quickly. Furthermore, comments either supporting or opposing submissions by other parties will be due within 14 days afterwards. It will be prudent to monitor the submissions portal over the coming weeks to identify potential issues and allies and to facilitate submitting public comments.

Contact [Marshall Miller](#), [Brian Murphy](#), or [Sean Murray](#), with questions about or for assistance with submitting requests to add new derivative products.

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