



EXPANSIVE ADDITIONS TO SECTION 232 STEEL/ALUMINUM DERIVATIVE ARTICLES (August 15, 2025)

Effective August 18, the Department of Commerce has added 407 new Harmonized Tariff Schedule of the U.S. ("HTSUS") tariff classifications to the list of products considered steel or aluminum derivative articles subject to the 50% Section 232 steel and aluminum tariffs. This significant expansion includes almost all (407 of 525) of the unique HTSUS tariff provisions which were the subject of Section 232 steel/aluminum derivative tariff inclusion requests, as discussed in our May 22 [What's New](#) update.

The Commerce [notice](#) was posted at 4:15pm EST Friday on the [Federal Register](#) Public Inspection list and is scheduled for publication on August 19, one day after it goes into effect. Commerce has [posted](#) rudimentary decision memoranda on the approval or denial of each tariff inclusion request. Denials appear to be only for HTSUS provisions that are subject to separate Section 232 or other investigations. CBP has issued CSMS messages [#65936570](#) (steel) and [#65936615](#) (aluminum) with guidance on these additions.

The additions cover a wide swath of tariff classifications from HTSUS subheadings 0402.99.70 (whipped cream) to 9506.91.00 (exercise equipment). Given the breadth of HTSUS classifications, many importers will be impacted. It is noted that Section 232 Proclamations and HTSUS tariff provisions apply Section 232 tariffs only to the steel or aluminum content of articles, if known, with the non-steel and non-aluminum content subject to reciprocal tariffs and other applicable tariffs. If unknown, the full value of the derivative articles is subject to the 50% Section 232 tariffs. Clients should carefully review the HTSUS provisions and work on gathering steel and aluminum content values for subject derivative articles.

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

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