



**SECTION 232 STEEL/ALUMINUM DERIVATIVE
TARIFF INCLUSION REQUESTS
WITH SHORT COMMENT PERIOD
(October 9, 2025)**

On October 7, the Commerce Department posted 95 Section 232 Steel and Aluminum Tariff Inclusion Requests for inclusion as steel and aluminum derivatives subject to 50% Section 232 additional tariffs and opened a two-week window for the public to submit comments. The inclusion requests cover a large number of HTSUS provisions. The public can submit comments in response to the Section 232 Inclusion Requests through **October 21** on the Regulations.gov [website](#).

The ninety-five (95) Section 232 Tariff Inclusion Requests filed by domestic producers and trade associations during the two-week period at the end of September propose “including” (i.e., adding) 691 unique 8-digit or 10-digit HTSUS classifications, ranging from HTSUS subheadings 0402.91.10 (milk) to 9406.90.01 (prefabricated buildings). Duty-free agricultural machinery in HTSUS subheading 9817.00.50 is also included, which would set a new precedent for the treatment of HTSUS Chapter 98 classifications under Section 232 tariff actions. HTSUS classifications proposed for inclusion provide for, among other products, beverages, twist ties, prefabricated structural components, commercial truck and trailer wheels, cast iron pipe and fittings, municipal/construction castings, cookware, aluminum powder, hand tools, press plates and related parts, agricultural knives, rotary cutting equipment, engine and automotive parts, canned fruits, meats, seafood, vegetables, seasonings and nuts, gun safes, boilers and boiler equipment, compressors and pumps, oil and gas equipment, truck, van, and trailer liftgates, mold bases, transformers, electric storage battery parts, insulated wires/cables, motorcycles, bicycles and related parts, etc. Some of the HTSUS classifications are requested for inclusion as either steel or aluminum derivatives, while some HTSUS classifications are requested for inclusion as both steel and aluminum derivatives, and some of the HTSUS classifications are already subject to Section 232 additional tariffs as steel or aluminum derivatives. Clients can contact [Brenda Zeller](#) for the Firm’s spreadsheet of the identified HTSUS classifications and associated tariff inclusion requests.

Once the comment period ends on October 21, the Secretary of Commerce has 60 days to decide which of the proposed products (i.e., HTSUS classifications) will be added as steel and aluminum derivative articles subject to 50% Section 232 Steel and Aluminum additional tariffs. Given the breadth of HTSUS classifications, many importers will be impacted if these Section 232 tariff inclusions are approved. Therefore, we strongly recommend that clients review the HTSUS classifications and file comments if they oppose a Section 232 Tariff Inclusion Request. For the first cycle, Commerce approved nearly all Tariff Inclusion Requests with almost immediate effect. See our August 15 [What’s New](#).

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

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

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