MILLER & COMPANY P.C.
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PROPOSED ADDITIONAL SECTION 232 STEEL, ALUMINUM, AND COPPER DERIVATIVES AND SAFEGUARD TARIFF-RATE QUOTAS ON QUARTZ SURFACE PRODUCTS (August 5, 2026)

BIS Proposes Expanding Section 232 Tariffs to Additional Steel, Aluminum, and Copper Derivative Products

BIS issued a notice to be published in the upcoming Federal Register Notice requesting public comments on a proposal to add fourteen (14) additional derivative products (covered by 20 HTSUS provisions) to the scope of the Section 232 tariffs on steel, aluminum, and copper under Presidential Proclamation 11021.

The proposed derivative articles include:

- Aluminum powder (HTSUS 7603.10.0000)
- Brass-wind musical instruments (HTSUS 9205.10.0000)
- Parts and accessories of brass-wind musical instruments (HTSUS 9209.99.4080)
- Parts of welding machines and apparatus (HTSUS 8515.90.2000)
- Free-standing floor safes (HTSUS 8303.00.0000)
- Electric conductor cables (HTSUS 8544.49.2000, 8544.49.3040, 8544.49.3080, and 8544.60.4000)
    - HTSUS 8544.49.2000 is on the existing Aluminum derivative list.
- Fire extinguishers (HTSUS 8424.10.0000)
- Parts of heat exchange units (HTSUS 8419.90.3000)
- Parts of linear acting hydraulic power engines and motors (HTSUS 8412.90.9005)
- Mobile lifting frames on tires and straddle carriers (HTSUS 8426.12.0000)
- Other self-propelled cranes and mobile lifting frames (HTSUS 8426.41.0090)
- Tanker trailers and tanker semi-trailers (HTSUS 8716.31.00)
- Self-loading or self-unloading trailers and semi-trailers for agricultural purposes (HTSUS 8716.20.00)
- Other trailers and semi-trailers (HTSUS 8716.40.00)
- Filled steel containers of propane, oxygen, and propene (propylene) (HTSUS 2711.12.0020, 2804.40.0000, and 2901.22.0000)

BIS indicates imports of most proposed products would be subject to the 25% Section 232 tariff rate applicable to the full value of the articles. Mobile lifting frames, straddle carriers, and certain self-propelled cranes would generally be subject to the mobile industrial equipment tariff framework within clauses (2) and (3) of Proclamation 11032. Self-loading or self-unloading agricultural trailers and semi-trailers would generally be subject to a 15% tariff rate, while filled steel containers would generally be subject to a 50% tariff applicable only to the value of the steel container and not its contents.

BIS is seeking comments concerning the metal content of the proposed articles, whether import volumes undermine national security, the ability of domestic producers to satisfy demand, the economic impact of expanding the tariffs, and any other relevant factors. Comments are due by August 27, 2026.

Given the relatively short comment period, companies that import, manufacture, distribute, or consume any of the identified products should promptly assess the potential impact of the proposed duties on their operations and supply chains.

Safeguard Tariff-Rate Quotas on Quartz Surface Products

On July 31, 2026, President Trump issued a Presidential Proclamation entitled 'To Facilitate Positive Adjustment to Competition from Imports of Quartz Surface Products' imposing four-year safeguard tariff rate quotas (TRQs) on imports of certain quartz surface products (QSP) effective for merchandise entered, or withdrawn from warehouse for consumption, on or after 12:01 a.m. EDT on August 15, 2026. The action follows a U.S. International Trade Commission (USITC) determination that increased imports of quartz surface products are a substantial cause of serious injury to the domestic industry.

The affected quartz surface products are classified under HTSUS subheadings 6810.99.0020, 6810.99.0040, and 7020.00.6000. Covered merchandise includes slabs and other surfaces produced primarily from silica-based materials, such as quartz, quartz powder, cristobalite, or glass powder, combined with a resin binder. The scope includes countertops, backsplashes, vanity tops, bar tops, work tops, tabletops, flooring, wall facings, shower surrounds, fireplace surrounds, mantels, tiles, and similar products, whether finished or unfinished, fabricated or unfabricated. The scope includes QSP attached to non-subject merchandise such as sinks and cabinets.

The annual TRQ will be administered on a quarterly basis, with unused quota amounts eligible to carry-forward into subsequent quarters. Importantly, the safeguard duties apply in addition to any normal customs duties, antidumping duties, countervailing duties, or other applicable import charges.

Period	Annual TRQ Quantity	In-Quota Duty Rate	Over-Quota Duty Rate
August 15, 2026 - August 14, 2027	13.0 million m^2	25%	50%
August 15, 2027 - August 14, 2028	14.8 million m^2	23%	49%
August 15, 2028 - August 14, 2029	15.2 million m^2	21%	48%
August 15, 2029 - August 14, 2030	15.7 million m^2	19%	47%

Not all countries will be subject to safeguard measures. Consistent with USITC findings and Free Trade Agreement provisions, the Proclamation excludes imports from Canada, Mexico, Australia, Colombia, Israel, Panama, Peru, Singapore, South Korea, the CAFTA-DR countries, qualifying Caribbean Basin beneficiary countries, and numerous developing countries identified in U.S. Note 41 (c).

Any merchandise subject to the safeguard measure that is admitted into a U.S. Foreign-Trade Zone (FTZ) on or after August 15, 2026 must be admitted in Privileged Foreign (PF) status and will be subject to the applicable TRQ restrictions and safeguard duties based on its HTSUS classification. Clients should consider not admitting subject QSP into FTZs due to 19 C.F.R § 146.65(a)(1) TRQ language.

Importers of quartz surface products should review both the Proclamation and Annex carefully to determine the applicability of the new quota restrictions, country exemptions, duty exposure, and FTZ implications prior to the August 15, 2026, implementation date.

Please contact Marshall Miller, Brian Murphy, Sean Murray, or David Ostheimer with questions.

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