



steel/aluminum tariffs exemptions clarified

MSK Client Alert

March 29, 2018

In off the record comments on March 28, 2018, an official of the Dept. of Commerce provided some clarification as to how the product exemption process will work relative to steel and aluminum tariffs. Of course, the starting point is: if your product is subject to the steel or aluminum tariffs and is not from an exempted country, the 25% or 10%, respectively, will have to be paid. After that, things get trickier.

If you decide to seek exemption for your product, the first step obviously is to gather the needed details and file your exemption request. The way the process is intended to work is once the exemption request is uploaded to regulations.gov, the Bureau of Industry and Security ("BIS") will review it for completeness. If not complete, the application will be rejected. If complete, it will be officially posted on the regulations.gov website. That date is key. Because, if your exemption request is later granted, while not official until five days after it is published, you will be able to seek refunds on any entries filed between the date the exemption request is posted and when it is granted.

[View Full Alert](#)

attorneys

Susan Kohn Ross

practice areas

international trade
regulatory