

Commerce Department Imposes Section 232 Derivative Steel and Aluminum Tariffs on Dry Van and Refrigerated Trailers

August 19, 2025

Washington, DC – On Friday, August 15, 2025, the U.S. Department of Commerce issued its determinations imposing derivative steel and aluminum tariffs on dry van trailers and refrigerated trailers (also known as "reefers"), and subassemblies thereof, pursuant to Section 232 of the Trade Expansion Act of 1962 (Section 232). These derivative tariffs come in response to the May 15, 2025 requests submitted by the American Trailer Manufacturers Coalition asking that Commerce expand the Section 232 tariffs to include additional steel and aluminum derivative products. The ad hoc coalition of U.S. trailer manufacturers includes Great Dane, Stoughton Trailers, Strick Trailers, and Wabash.

As the Coalition explained in its requests, rapidly rising imports of foreign-made dry vans and reefers, from Mexico and China in particular, have undermined the effectiveness of the Section 232 steel and aluminum tariffs and threaten the vitality of the U.S. dry van and reefer industry. Commerce's ruling will allow the U.S. dry van and reefer industry to remain commercially competitive and level the playing field against foreign imports that lessen demand for American-made steel and aluminum.

Counsel to the Coalition, Robert E. DeFrancesco, partner at Wiley Rein LLP's International Trade Practice, said, "The Coalition appreciates the Administration's action to address unfair trade practices impacting the U.S. dry van and reefer industry. Commerce's decision to impose Section 232 derivative tariffs on these imports is a critical step toward restoring fair competition and protecting American manufacturing."

Related Professionals

Robert E. DeFrancesco, III
Partner
202.719.7473
rdefrancesco@wiley.law

Laura El-Sabaawi
Partner
202.719.7042
lel-sabaawi@wiley.law

John Allen Riggins
Associate
202.719.4493
jriggins@wiley.law

Practice Areas

International Trade
Trade Policy and Trade Negotiations

Per the notice scheduled to be published in the Federal Register on August 19, 2025, Section 232 steel and aluminum tariffs covering U.S. imports of dry van and reefer products under HTS 8716390040 took effect at 12:01 EDT August 18, 2025.

The Wiley team also includes International Trade partner Laura El-Sabaawi and associate John Allen Riggins.

For more information, please contact Robert DeFrancesco at 202.719.7473 or rdefrancesco@wiley.law.