

U.S. Line Pipe Industry Pursues Action to Prevent Undervaluation of Section 232 Duties on Steel Line Pipe Imports

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Washington, DC – On December 22, the American Line Pipe Producers Association (ALPPA) filed an allegation with U.S. Customs and Border Protection (CBP), requesting that the agency investigate certain imports of line pipe that may have entered the United States without paying the full amount of required Section 232 duties. Specifically, ALPPA understands that certain importers may have undervalued the portion of the line pipe on which Section 232 duties are owed and, by doing so, underpaid Section 232 duties.

Available information indicates that the relevant importers may have declared only the value of bare pipe as subject to Section 232 measures, rather than the full value of the fabricated, coated line pipe, as required under law. In guidance, CBP has been clear that Section 232 duties on steel pipe must be assessed on the full entered duty of the article. In particular, coating costs cannot be deducted from the steel pipe value for the purposes of assessing applicable Section 232 duties.

“We commend CBP for consistently investigating companies that are evading duties and for taking strong action to enforce the trade laws, including Section 232, and we are confident that CBP will similarly take enforcement action here,” said Timothy C. Brightbill, co-chair of Wiley’s International Trade Practice and counsel to ALPPA. “Robust enforcement of the Section 232 measures is critical to ensure that the duties have their intended effect of protecting U.S. national security. Importers cannot be permitted to evade U.S. trade laws with impunity.”

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Duties on steel imports, including steel line pipe imports, under Section 232 of the Trade Expansion Act of 1962 have been in place since March 2018. Earlier this year, all exemptions and exceptions to the Section 232 duties were removed and, in June 2025, the duty rate was increased to 50%. Duty evasion is illegal and closely monitored by CBP, and severe penalties may apply. ALPPA monitors these unfair trade practices closely and is committed to strong enforcement of trade measures in place on imports of steel line pipe.

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