

U.S. Manufacturers Request Cover For Dry Van and Refrigerated Trailers Under Section 232 Tariffs on Steel and Aluminum Products

May 19, 2025

Washington, DC – Wiley, on behalf of the American Trailer Manufacturers Coalition, submitted requests to the U.S. Department of Commerce to include dry van trailers and refrigerated trailers (also known as "reefers"), and subassemblies thereof, within the measures on steel and aluminum derivative products under Section 232 of the Trade Expansion Act of 1962. The ad hoc coalition of U.S. trailer manufacturers includes Great Dane, Stoughton Trailers, Strick Trailers, and Wabash.

The requests, filed May 15, explain that imports of foreign-made dry vans and reefers incorporating foreign-made steel and aluminum articles have undermined the effectiveness of the Section 232 tariffs and threaten the vitality of the U.S. dry van and reefer industry.

Robert E. DeFrancesco, partner in Wiley's International Trade Practice, is counsel to the domestic coalition. The Wiley team also includes International Trade partner Laura El-Sabaawi and associate John Allen Riggins.

Dry van and reefer production facilities for the four requesting companies are located throughout the United States, including in Arkansas, Georgia, Illinois, Indiana, Nebraska, Pennsylvania, Tennessee, and Wisconsin, and these facilities have been harmed by unfairly priced imports of dry vans and reefers.

The dry van and reefer industry is an essential industry for robust domestic supply chains. The coalition requests that the tariffs be applied to allow the U.S. dry van and reefer industry to remain

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

commercially competitive and level the playing field against foreign imports that would otherwise be exempt from the effects of the tariffs.

The Commerce Department is scheduled to make a determination on the coalition's request within 60 days of its submission. If the manufacturers' request is granted, the steel and aluminum content of imports of dry van trailers and reefers entering under Harmonized Tariff Schedule subheading 8716.39.0040 will be subject to 25% tariffs. The tariffs would not apply to the value of the entire trailer, but rather the full value of the steel and aluminum content within the trailer.

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