

ALERT

Commerce Seeks Comment in New Section 232 Investigations Covering Imports of Commercial Aircraft and Jet Engines and their Parts

May 12, 2025

On May 9, the U.S. Department of Commerce (Commerce) released an advanced notice soliciting public comments on an investigation into the national security impacts of imported commercial aircraft and jet engines, and parts for commercial aircraft and jet engines. This notice is scheduled for publication in the Federal Register on May 13, with interested parties invited to submit comments by June 3, 2025.

Background

Commerce self-initiated the investigation on May 1, 2025, pursuant to Section 232 of the Trade Expansion Act of 1962, a statute that authorizes Commerce to investigate the national security implications of imported products. Within 270 days of launching an investigation, Commerce must issue a report to the President on its findings and provide recommendations for measures to address the national security threats. The President must then determine whether he concurs with Commerce's findings, and determine whether to take action, potentially including the imposition of tariffs, to adjust relevant imports in order to mitigate their impact on national security.

This new investigation follows closely behind other recent Section 232 investigations, including those involving steel, aluminum, copper, lumber/timber products, pharmaceuticals, semiconductors, critical minerals, and trucks.

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Practice Areas

International Trade

National Security

Commercial Aircraft and Jet Engines Investigation

Trade Policy and Trade Negotiations

In the investigation regarding commercial aircraft, jet engines, and parts for commercial aircraft and jet engines, Commerce is particularly interested in comments addressing the following:

- The current and projected demand for commercial aircraft and jet engines, and parts for commercial aircraft and jet engines, in the United States;
- The extent to which domestic production of commercial aircraft and jet engines, and parts for commercial aircraft and jet engines, can meet domestic demand;
- The role of foreign supply chains, particularly of major exporters, in meeting U.S. demand for commercial aircraft and jet engines, and parts for commercial aircraft and jet engines;
- The concentration of U.S. imports of commercial aircraft and jet engines, and parts for commercial aircraft and jet engines, from a small number of suppliers and the associated risks;
- The impact of foreign government subsidies and predatory trade practices on the competitiveness of the commercial aircraft and jet engine industry, as well as the associated commercial aircraft and jet engine parts industry, in the United States;
- The economic impact of artificially suppressed prices of commercial aircraft and jet engines, and parts for commercial aircraft and jet engines, due to foreign unfair practices and state-sponsored overproduction;
- The potential for export restrictions by foreign nations, including the ability of foreign nations to weaponize their control over supplies of commercial aircraft and jet engines, and parts for commercial aircraft and jet engines;
- The feasibility of increasing domestic capacity for commercial aircraft and jet engines, and parts for commercial aircraft and jet engines, to reduce import reliance; and
- The impact of current trade policies on domestic production of commercial aircraft and jet engines, and parts for commercial aircraft and jet engines, and whether additional measures, including tariffs or quotas, are necessary to protect national

security.

Parties are also asked to submit comments on any other relevant factors.

Interested parties seeking to file comments must do so on the docket for the investigation. While business confidential information may be submitted, it must be properly designated in accordance with agency regulations and a public version must also be filed.

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