

# Trump Expands National Security Tariffs on Steel and Aluminum Products

February 11, 2025

On February 10, 2025, President Trump signed new Executive Orders imposing enhanced import duties on steel and aluminum products under Section 232 of the Trade Expansion Act of 1962. The orders eliminate certain exemptions from the duties, expand their scope to cover additional products, and raise the duties on covered aluminum goods from 10% to 25%.

President Trump originally imposed Section 232 duties on steel and aluminum products during his first Administration, in 2018. Those measures have continued in effect since that time, with certain changes including the exemption of certain countries from the duties entirely and the establishment of absolute quotas or tariff rate quotas (TRQs) for others. The coverage of the original duties was also broadened in the past to cover not just “mill” products like steel and aluminum sheets, but certain downstream goods such as aluminum stranded wire, cables, plaited bands, steel nails, and staples.

Pursuant to the new orders:

- Effective March 12, duties will be reinstated as to countries previously exempted from them or for which quotas or TRQs were imposed in place of duties. Specifically, the orders terminate:
  - For steel:
    - The duty exemptions for Australia, Canada, Mexico, and Ukraine, including goods produced in the European Union, using material melted/poured in Ukraine;

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## Practice Areas

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- The current TRQs for Japan, the EU, and the United Kingdom; and
- The absolute quotas currently applicable to Argentina, Brazil, and South Korea.
- For aluminum:
  - The duty exemptions for Australia, Canada, and Mexico;
  - The current TRQs for the EU and the United Kingdom; and
  - The absolute quota currently applicable to Argentina.
- Also effective March 12, the current 10% Section 232 duties on aluminum goods will rise to 25%.
- The scope of the pre-existing Section 232 duties will be enlarged to include additional derivative goods, including certain products classified outside of Chapters 72-73 and 76 of the Harmonized Tariff Schedule of the United States.
  - The specific tariff codes at issue will be identified in yet-to-be-released Annexes to accompany the orders;
  - Duties will not be owed on the additional derivative steel/aluminum articles produced abroad using steel melted/poured and aluminum smelted and cast in the United States;
  - Duties will only be owed on the steel/aluminum content within the additional derivative articles that are classified outside of Chapters 72-73 and 76;
  - The effective date of the enhanced duties on these articles is paused pending development of effective duty-collection systems for them; and
  - There will be a new process by which the Administration will consider further expansion of the duties to additional downstream steel- and aluminum-intensive products, either by Commerce or at the request of producers or trade associations.
- Time-limited, product-specific, importer-specific exclusions from the pre-existing duties were granted in the past, as well as certain "general" exclusions. However, pursuant to the new orders:
  - No new requests for exclusions will be considered, effective February 10, 2025.
  - Existing product-specific, importer-specific product exclusions will lapse at the end of their current terms or upon importation of permitted volumes and will not be renewed.
  - The current general approved exclusions will lapse on March 12, 2025 and will not be renewed.
- U.S. Customs & Border Protection is directed to aggressively investigate misclassification resulting in non-payment of the new duties and seek maximum penalties without mitigation.

For any questions or further information on these new duties, please contact any of the attorneys listed on this notice.

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