CLIENT ALERTS & INSIGHTS

232 Duty Increase Updates | Steel and Aluminum Tariffs - Impact and Timeline of President Trump's Proclamation

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This article was originally published on February 11, 2025. It has been updated to reflect changes from additional Presidential Actions. An additional Proclamation was published on the evening of February 11, 2025. Annexes to each Proclamation were published on February 18, 2025. On June 3, 2025, the White House published a new Proclamation and Fact Sheet.

The White House issued a Fact Sheet and Proclamation addressing Section 232 tariff actions on February 10, 2025. These steps strengthen President Trump's 2018 tariff actions on steel and aluminum imported into the United States. The Proclamation on steel imports was published on February 10 and the Proclamation on aluminum imports was published on February 11. Annex Is on derivative steel imports and derivative aluminum imports were published on February 18. On June 3, 2025, the White House published a new Proclamation and Fact Sheet increasing the tariff rate on dutiable steel and aluminum imports.

What is Changing for Steel and Aluminum Imports - The Proclamations published on February 10 and 11, 2025 (the "February Proclamations") strengthened a 25% ad valorem tariff on the steel and aluminum imports in addition to any other duties that may apply. Effective June 4, 2025, this tariff has been increased from 25% to 50% for all subject imports. An exception exists for those subject imports from the United Kingdom through July 9, 2025, pending ongoing trade negotiations with the US. The respective Proclamations make changes to the existing Section 232 program including eliminating alternative agreements, exemptions, and exclusions that previously limited application of the duties. The President also seeks more stringent "melted and poured" standards, expanded scope to certain downstream products, and efforts to target duty evasion through tariff misclassification. Drawback will not be available for duties imposed under the Proclamations. Annex I of derivative steel imports includes products such as flanges, butt welding fittings, railway or tramway track construction material, bridges, bridge sections, modular building units, skip hoists, and cooking ware. Annex I of derivative aluminum is less exhaustive than its steel counterpart. The Aluminum Annex includes an array of goods such as pneumatic cylinders for lifting, bakeware, castors, venetian blinds, ladders, doors, and base mountings designed for motor vehicles.

What is Changing for CBP Enforcement - The Proclamations signal an appreciable change in the enforcement posture by U.S. Customs and Border Protection ("CBP"). Going forward, if CBP finds misclassification of steel articles, it will pursue maximum civil penalties without considering evidence of mitigation.

When are Changes Effective for Steel and Aluminum Imports - March 12, 2025, is the effective date for removing special arrangements with foreign countries, generally approved exclusions, and for the imposition of tariffs on additional derivative steel and aluminum articles. Countries of origin impacted by the changes for both steel and aluminum imports include Argentina, Australia, Canada, EU countries, Mexico, and the United Kingdom. Countries of origin impacted solely by the changes for steel imports include Brazil, South Korea, and Ukraine. Lists of additional derivative steel and aluminum articles impacted by this change will appear in two forthcoming Annexes to be published in the Federal Register. Dates are subject to the announcement that adequate systems are in place to process and collect tariff revenues. Also, no new product exclusions will be available following February 10, 2025. Any currently granted product exclusions will remain effective until the latter of their expiration date or until the excluded product volume is imported.

Why the Change is Occurring - The rationale for these actions under the Trade Expansion Act of 1962 is to protect national security interests in domestic steel and aluminum production from unfair trade practices.

How Supply Chains Can Prepare - United States importers and industries reliant on imported goods are entering a higher-cost operating environment. Strong procurement, operational, and sales planning is key for managing the impact of steel imports and all other recent tariff actions. Those proactive steps often involve confirming HTS codes and country of origin, examining necessary volumes for immediate and long-term demand, considering the availability of alternate supply from domestic sources, and revisiting buy-side and sell-side contract terms. Finally, companies with symbolic significance for the United States (such as Kentucky bourbon) will need to stay alert to possible retaliatory tariffs on exports to our trading partners.

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Trump Tariffs - 2025 Expectations, Facts, and Options

UPDATE: Trump Tariffs on Mexico, Canada, China - Supply Chain Impact and Strategies

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