

# Publications

September 18, 2025 • Updates

## Administration Opens Process to Expand Section 232 Duties to Additional Steel and Aluminum Derivative Products and Automobile Parts

### Key Takeaways:

- The U.S. Department of Commerce is accepting requests that could lead to Section 232 tariffs on more products derived from steel and aluminum, as well as additional automobile parts. If approved, these downstream products could face tariffs of 50% for steel and aluminum and 25% for automobile parts.
- The Department is accepting inclusion requests for steel and aluminum downstream products through Sept. 29, 2025. Consideration for automobile parts will run from Oct. 1 to Oct. 15, 2025. After each window closes, the Department will accept public comments for two weeks.

The Bureau of Industry and Security (BIS) of the Department of Commerce issued its decisions on the first round of steel and aluminum derivative product requests, significantly expanding its 50% tariffs on steel and aluminum imports effective Aug. 18, 2025, to include more than 400 downstream products made from steel and aluminum. This week, BIS opened the door to further expand downstream steel and aluminum products in the second steel and aluminum products request period, and, for the first time, additional automobile parts for passenger vehicles and light trucks.

### Background

On April 3, 2025, President Trump imposed new Section 232 tariffs of 25% tariffs on certain automobiles and automobile parts imported into the U.S., citing national security concerns under the Trade Expansion Act of 1962, as amended (19 U.S.C. 1862) (Section 232). Two months later, on June 4, 2025, he doubled the tariffs on imports of steel and aluminum and their derivative products to 50%, invoking the same rationale.

Under both actions, the Secretary of Commerce established processes to allow entities to petition the Administration to include additional steel and aluminum derivative products and automobile parts within the scope of Section 232 duties. At the close of the submission window, BIS will post accepted inclusion requests for two weeks to allow

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### Related Capabilities

- Trade Law Remedies
- International Trade
- Customs
- International
- Export Controls, Economic Sanctions & Compliance

public comments on those requests.

## Timelines and Submission Process

1. **Steel and Aluminum:** The inclusion request window opened Sept. 15, 2025, and will close on Sept. 29, 2025. Submissions must be emailed to the Defense Industrial Base Programs inbox at [DIBPrograms@bis.doc.gov](mailto:DIBPrograms@bis.doc.gov). After the submission window closes, accepted inclusion requests will be posted for a two-week public comment period on Docket ID BIS–2025–0023 on Regulations.gov (likely to end on or around Oct. 13, 2025). Requirements to file a request can be found [here](#).
2. **Automobile Parts:** The inclusion request window opens Oct. 1 and will close on Oct. 15, 2025. Submissions must be emailed in PDF format to [AutoInclusions@trade.gov](mailto:AutoInclusions@trade.gov). After the submission window closes, accepted inclusion requests will be posted for a two-week public comment period on Docket ID: ITA-2025-0038 on Regulations.gov (likely ending on or about Oct. 29, 2025). Requirements to file a request can be found [here](#).
3. **Rulemaking for Automobile Parts Process:** BIS issued an interim final rule on Sept. 17, 2025, establishing a new Section 232 Automobile Parts inclusion process. Public comments on the rule must be filed by Nov. 3, 2025 at Regulations.gov (Docket ID: ITA-2025-0041, RIN 0625-AB30). This public comment period is separate from the inclusion process.

## Implications for Business

These inclusion processes could significantly expand the reach of Section 232 tariffs. Domestic manufactures of steel, aluminum, and automobile parts may benefit from the added protection, but could face additional costs and compliance burdens if they rely on imported products subject to these tariffs.

Companies should consider how the expanded tariffs may impact their operations and determine whether to file an inclusion request or respond to others.

If your business needs strategic legal guidance or anticipates potential impacts resulting from these announcements, contact Deanna Okun, Lydia Pardini, Polsinelli's Executive Action Working Group or your Polsinelli contact.