

# Publications

March 3, 2025 • Updates

## Another New Section 232 Investigation on Imports of Timber, Lumber and Derivative Products

On March 1, 2025, President Trump signed an executive order directing the Secretary of Commerce (Secretary) to initiate an investigation under Section 232 of the Trade Expansion Act of 1962 (Section 232) to determine whether imports of timber, lumber and their derivative products threaten to impair U.S. national security. An affirmative determination in this investigation could lead to additional duties or other actions impacting imports of lumber products. This is his second such executive order this term; last week President Trump ordered Commerce to investigate copper imports under the same statutory tool.

The executive order sets forth the value of wood products as a key input for the civilian construction industry and the military as indicated by the U.S. military's spending on construction and investments in innovative building material technology. In the order, the President further noted that the U.S. has been a net importer of lumber despite the fact that the U.S. softwood lumber industry has the practical capacity to supply 95% of 2024 U.S. consumption.

To determine the effects of lumber imports on national security, the Secretary will assess the factors set forth in 19 U.S.C. § 1862(d) such as domestic production needed for projected national defense requirements, the capacity of domestic industries to meet such requirements, and the availability of the resources essential to the national defense. In addition to those statutory factors, the executive order further directs the Secretary to evaluate the following six (6) factors:

1. The current and projected demand for timber and lumber in the United States;
2. The extent to which domestic production of timber and lumber can meet domestic demand;
3. The role of foreign supply chains, particularly of major exporters, in meeting United States timber and lumber demand;
4. The impact of foreign government subsidies and predatory trade practices on United States timber, lumber and derivative product industry competitiveness;
5. The feasibility of increasing domestic timber and lumber capacity to reduce imports; and

## Related People

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## Related Capabilities

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6. The impact of current trade policies on domestic timber, lumber and derivative product production and whether additional measures, including tariffs or quotas, are necessary to protect national security.

This direction that Commerce investigate lumber imports under Section 232, coming on the heels of last week's direction that Commerce investigate imports of copper, continues to underscore that Section 232 is a preferred import adjustment mechanism for the Trump Administration. These two investigations constitute the ninth and tenth such investigations initiated or ordered to be initiated under the Trump Administration; in context, the Biden Administration initiated only a single investigation under Section 232; no investigations were initiated between 2002 and 2016.

The U.S. Department of Commerce typically invites interested parties to submit written comments or information relevant to the products subject to Section 232 investigations. If your business needs strategic guidance or anticipates potential impacts resulting from the new investigation, contact Deanna Okun, Lydia Pardini, Polsinelli's Executive Action Working Group or your Polsinelli contact.