

Publications

May 13, 2025 • Updates

U.S. Launches National Security Investigation Into Aircraft and Jet Engine Imports

On May 1, 2025, the Secretary of Commerce initiated a new investigation under Section 232 of the Trade Expansion Act of 1962 (Section 232) on imports of commercial aircraft and jet engines, and parts for commercial aircraft and jet engines to evaluate the effects these imports have on U.S. national security. Most imports of these products are already subject to additional ten percent reciprocal duties under the International Emergency Economic Powers Act, although a recent trade deal with the United Kingdom announced by the White House on May 8, 2025, may allow British imports of Rolls-Royce engines and parts to enter the United States duty-free.

To determine the effects on national security of imports of commercial aircraft, jet engines and parts, the Secretary is inviting written comments, data, analyses or other information from interested parties by June 3, 2025. Information and argument provided should aid Commerce's assessment of 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. The Secretary is also particularly interested in comments and information directed at the criteria listed under 15 C.F.R. § 705.4 as they affect national security, including the following ten (10) factors:

1. The current and projected demand for commercial aircraft and jet engines, and parts for commercial aircraft and jet engines, in the United States;
2. The extent to which domestic production of commercial aircraft and jet engines, and parts for commercial aircraft and jet engines, can meet domestic demand;
3. 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;
4. 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;
5. 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;

Related People

- Lydia C. Pardini
- Deanna Okun
- Jane C. Dempsey

Related Capabilities

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

6. 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 trade practices and state-sponsored overproduction;
7. 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;
8. The feasibility of increasing domestic capacity for commercial aircraft and jet engines, and parts for commercial aircraft and jet engines, to reduce import reliance;
9. 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; and
10. Any other relevant factors.

Section 232 requires the Secretary of Commerce to complete an investigation and submit a report to the President within 270 days of initiating any investigation; the President then has up to 90 days to decide whether to concur with the report and take action. Notably, however, there is nothing preventing the Commerce or the President from moving more quickly.

Three prior Section 232 investigations on aluminum, steel, and automobiles have resulted in 25 percent tariffs on those products. There are also several ongoing Section 232 investigations on products including copper, lumber, semiconductors, pharmaceuticals, medium- and heavy-duty trucks and parts and critical minerals and derivative products. This new investigation on aircrafts, engines and parts, is part of the Trump Administration's overarching plan to prioritize American interests and to reduce reliance on other countries for critical materials.

If your business needs strategic legal advice or anticipates potential impacts resulting from the new investigation, contact Polsinelli's International Trade Team.