

PUBLICATION

Section 232 Steel and Aluminum Tariff Exemptions – What You Need to Know

March 20, 2018

Section 232 tariffs on steel and aluminum come into effect this week. Here are the basic facts.

What tariffs are being imposed?

A 25% tariff on steel and a 10% tariff on aluminum imports.

When do they take effect?

Customs and Border Protection will begin collecting the tariffs on March 23, 2018.

What products are covered?

All steel products under HTS Codes 7206.10 through 7216.50, 7216.99-7301.10, 7302.10, 7302.40-7306.90.

Unwrought aluminum under HTS Code 7601, wrought aluminum under 7604-7609, and castings and forgings under 7616.99.51.

Will there be exemptions for imports from certain countries?

Right now Canada and Mexico are exempt temporarily while NAFTA negotiations are underway.

The President has also brought up or hinted at potential exemptions for numerous allies, including Australia, Japan, the E.U., the U.K., and Korea. But it remains to be seen how specific country exemptions to the tariffs will be implemented.

Will there be exclusions for imports of specific products?

Yes.

Where can I apply for or object to an exclusion request?

The Department of Commerce's Bureau of Industry and Security has made available the forms for exclusion requests and objections to exclusion requests on its website, located [here](#) and [here](#).

Will my filing be public?

Yes.

How long will it take to find out if my product is exempt?

Exclusion requests will be publicly posted for a 30-day comment period and processing time is supposed to take no more than 90-days.

How will a decision be made about the exemptions?

The Department of Commerce will grant specific product exclusions if it determines the steel and aluminum articles you are seeking to import are not produced in the United States in a sufficient and reasonable quantity or of a satisfactory quality. It will also take into account the national security factors outlined in Section 232.

What does it cost to file?

There is no cost to file.

Do I have to pay the duties up front even if I apply for an exclusion?

Likely. Nothing has changed the existing requirement that all imports are subject to the duties unless exempt.