

PUBLICATION

New Section 232 Investigations Target Unmanned Aircraft Systems and Polysilicon: What Impacted Businesses Need to Know

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The Department of Commerce (Commerce) has launched two additional Section 232 investigations covering unmanned aircraft systems (UAS), their parts and components, and of polysilicon and its derivatives. President Trump is expected to impose tariffs on articles covered by the investigations after Commerce completes each review. Commerce has requested comments, which are due by August 6, 2025.

Potential Action for Interested Parties:

Participation in such investigations is important and can be done by providing Commerce public comments. The comment periods serve as valuable means to address trade-related risks. Interested parties can work with counsel to prepare and file comments, by the deadline of August 6th, that provide relevant information to Commerce.

As the Trump administration continues negotiating trade deals with other countries, it is also continuing to pursue industry-specific trade actions. On July 14, 2025, Commerce announced that it had initiated two new Section 232 investigations. The first is on unmanned aircraft systems (UAS) and their parts and components. The second is on polysilicon and its derivatives. These investigations also come as the President announced the potential tariff actions to be taken under the ongoing copper and pharmaceutical Section 232 investigations, which we have previously [discussed](#).

The New Investigations

As mentioned above, the new investigations cover unmanned aircraft systems (UAS), their parts and components, and polysilicon and its derivatives. Commerce is seeking information related to particular factors bearing on national security, such as U.S. demand, the ability to meet that demand, and the reliance on other countries to do so. Commerce also asks whether imports come from a small number of foreign and domestic fabrication facilities. Other factors relate to trade practices by other countries and whether they adversely affect the U.S. industry and national security.

Based on the comments received and other information collected during the investigation, Commerce will prepare a report containing recommendations. These recommendations have historically included tariffs, quotas, stockpile expansion, domestic initiatives, requirements for Congressional action, the establishment of a working group, and multilateral negotiations. Investigations must be completed within 270 days but are trending on a short timeline during the current administration. Additionally, there are no statutory or regulatory limits as to when the President must implement measures under the investigation.

What To Expect

These are the eighth and ninth Section 232 investigations launched by Trump this term. There are also tariffs imposed under the steel, aluminum, and automobiles Section 232 investigations from Trump's first term.

Based on these settled and ongoing investigations – copper, lumber, pharmaceuticals, semiconductors, medium-duty and heavy-duty trucks, commercial aircraft and jet engines, and critical minerals – we expect

tariffs on UAS and polysilicon upon completion of the investigation. Further, as mentioned, investigations must be completed within 270 days but can be shorter. Trump signaled that action under the copper investigation is coming soon; there will likely be swift action under these new investigations, too.

Finally, these tariffs are not at issue in the ongoing lawsuits challenging the President's authority to impose tariffs under the International Emergency Economic Powers Act of 1977 (IEEPA). Section 232 gives the President separate legal authority to impose tariffs.

Our International Trade and National Security team will continue to monitor developments and provide updates as warranted. If you have any questions or would like to discuss this in further detail, please contact [P. Lee Smith](#), [Matthew McGee](#), [Georgia Berthelot](#), or any member of Baker Donelson's [International Trade and National Security team](#).