June 9, 2025

UPDATED FACT SHEET
FOR THE NATIONAL PROPANE GAS ASSOCIATION
ON STEEL AND ALUMINUM TARIFFS

Background

Since the first Trump administration, the United States has maintained duties on imported steel and aluminum, and certain imported steel-derivative and aluminum-derivative products, under section 232 of the Trade Expansion Act of 1962. Section 232 permits the President to "adjust imports," including through the use of tariffs, in situations where excessive foreign imports are found to be a threat to U.S. national security.

Prior to February 2025, the section 232 duties were 25% for imported steel and certain steel-derivative products, and 10% for imported aluminum and certain aluminum-derivative products. Negotiated exemptions from the duties covered products of certain countries.

The 2025 Presidential Proclamations

The February 10, 2025, Proclamations

On February 10, 2025, President Trump issued Proclamations 10895 (https://public-inspection.federalregister.gov/2025-02832.pdf; for aluminum) and 10896 (https://public-inspection.federalregister.gov/2025-02833.pdf; for steel). These Proclamations:

- Raised the section 232 duty on aluminum and certain aluminum-derivative products to 25%;
- Eliminated the negotiated country-specific exceptions;
- Eliminated the process through which businesses could seek exclusions from the tariffs for certain products, and provided for the phase-out of previously-granted exclusions;
- Provided for an expansion of the scope of covered steel-derivative and aluminum-derivative products; and
- Provided for the creation of a process though which domestic producers and industry associations can file requests to have the tariff applied to additional steel-derivative and aluminum-derivative products.

The rate change, elimination of country-specific exceptions, and expansion in the scope of covered steel-derivative and aluminum derivative products all took effect on March 12, 2025.

The June 3 Proclamation

On June 3, 2025, President Trump issued a proclamation further adjusting the steel and aluminum duties under section 232 (https://www.whitehouse.gov/presidential-actions/2025/06/adjusting-imports-of-aluminum-and-steel-into-the-united-states/). That Proclamation:

- Raised the section 232 duty on steel and aluminum and steel-derivative and aluminum-derivative articles from 25% to 50% (except for products of the United Kingdom).

- Expanded the set of steel-derivative and aluminum-derivative articles for which the section 232 tariff applies only to the value of the steel and aluminum content, as opposed to the value of the entire article. (See details in Coverage Notes section below.)

- Applied the worldwide IEEPA tariffs (if applicable to the country of origin of the article) to the non-aluminum, non-steel content of steel-derivative and aluminum-derivative articles that are subject to section 232 tariffs on the value of their steel and aluminum content. (See details in Coverage Notes section below.)

The changes made in the June 3 proclamation took effect at 12:01AM on June 4, 2025.

Covered Tariff Codes

Covered HTS codes can be found in the Harmonized Tariff Schedule of the United States (HTSUS) (available at https://hts.usitc.gov), Chapter 99, Subchapter III, U.S. Notes 16 (for steel) and 19 (for aluminum).

In connection with its implementation guidance, CBP has also published lists of covered tariff codes, which can be downloaded in MS Word format. Links to download these lists appear at the bottom of CBP's updated Cargo Systems Messaging Service (CSMS) notices, published on June 9, 2025: https://content.govdelivery.com/bulletins/gd/USDHSCBP-3e43a50?wgt_ref=USDHSCBP_WIDGET_2 (for aluminum) and https://content.govdelivery.com/bulletins/gd/USDHSCBP-3e43b34?wgt_ref=USDHSCBP_WIDGET_2 (for steel).

Note that the lists published in connection with the CSMS notices issued by CBP on June 3, 2025, contained errors, and should not be used.

Coverage Notes:

- HTS number 7311.00.00 ("Containers for compressed or liquefied gas, of iron or steel") is included within the coverage of the steel 232.

- Steel-derivative articles in Annex I to Proclamation 10896 are not subject to the section 232 duty if they were processed outside the United States from steel articles melted and poured in the United States. Aluminum-derivative articles in Annex I to Proclamation 10895 are not subject to

the section 232 duty if they were processed outside the United States from aluminum articles that were smelted and cast in the United States.

- Products subject to section 232 steel/aluminum duties are not also subject to IEEPA duties on Canadian and Mexican goods.

- Products subject to section 232 duties on autos and auto parts are not also subject to section 232 steel/aluminum duties.

- Under the February 10, 2025, proclamations, newly-covered steel-derivative and aluminum-derivative articles in HTS chapters 73 and 76 were subject to section 232 duties on their entire value, while newly-covered steel-derivative and aluminum-derivative articles in other HTS chapters were subject to section 232 duties only on the value of the steel and aluminum content. Effective June 4, for steel-derivative and aluminum-derivative articles in HTS Chapters 73 and 76, the section 232 tariffs apply only to the value of the steel and aluminum content.

- When steel-derivative and aluminum-derivative articles are subject to section 232 tariffs only on the value of their steel and aluminum content, the non-aluminum, non-steel content of the articles is subject to the worldwide IEEPA tariffs imposed pursuant to Executive Order 14257 of April 2, 2025, and its amendments and modifications – if those tariffs are applicable to the country of origin of the article. However, the aluminum and steel content of these articles is not subject to the worldwide IEEPA tariffs.

- Products subject to section 232 steel/aluminum duties are also subject to any applicable base rates, section 301 duties, fentanyl-related IEEPA duties on Chinese goods, and antidumping and countervailing duties.

- In certain situations, HTSUS Chapter 98 provides for special tariff treatment for goods produced abroad using U.S. manufactured inputs. While HTSUS Chapter 98 provisions generally apply to goods subject to the section 232 duties on steel and aluminum and steel-derivative and aluminum-derivative products, the special treatment provided for in HTSUS 9802.00.60 for metal articles further processed outside the United States does not apply to goods subject to these section 232 duties.

- Drawback cannot be claimed for section 232 duties on steel and aluminum, and steel-derivative and aluminum-derivative products.

The HTSUS can be found at https://hts.usitc.gov. This webpage includes a search function.