



Regulatory News Alerts & Updates

Regulatory Alert: Guidance on Section 232 Duty Application for Copper

August 13, 2025

What Has Changed?

U.S. Presidential Proclamation “Adjusting Imports of Copper into the United States” - published July 30, 2025 - applied Section 232 tariffs to semi-finished copper products and intensive derivative copper products. A 50% rate of duty for non-exempt copper products is effective August 1, 2025.

What Products Are Affected?

Covered Tariff Subheadings	Associated Tariff
Semi-finished Copper Products	
<ul style="list-style-type: none">7406 – Copper powders and flakes7407 – Copper bars, rods, and profiles7408 – Copper wire7409 – Copper plates, sheets and strip, of a thickness exceeding 0.15 mm7410 – Copper foil (whether or not backed with paper, paperboard, plastics or similar materials) of a thickness (excluding the backing) not exceeding 0.15 mm7411 – Copper tubes and pipes7412 – Copper tube or pipe fittings7413 - Stranded wire, cables, plaited bands and the like, including slings and similar articles, of copper, not electrically insulated7415 - Nails, tacks, drawing pins, staples (other than those of heading 8305) and similar articles, of copper or of iron or steel with heads of copper; screws, bolts, nuts, screw hooks, rivets, cotters, cotter pins, washers (including spring washers) and similar articles of copper7418 - Table, kitchen or other household articles and parts thereof, of copper; pot scourers and scouring or polishing pads, gloves	<ul style="list-style-type: none">9903.78.01 – 50% additional duty on the copper content of semifinished copper and intensive copper derivative products9903.78.02 – No additional duty on:<ul style="list-style-type: none">the non-copper content of semi-finished copper and intensive copper derivative products; andimported goods under the subject HTSUS classifications which contain no copper.

and the like, of copper, sanitary ware and parts thereof, of copper • 7419 - Other articles of copper	
Derivative Goods Outside of Chapter 74	
• 8544.42.10 • 8544.42.20 • 8544.42.90 • 8544.49.10	• 9903.78.01 – 50% additional duty on the copper content of semifinished copper and intensive copper derivative products • 9903.78.02 – No additional duty on: <ul style="list-style-type: none"> ○ the non-copper content of semi-finished copper and intensive copper derivative products; and ○ imported goods under the subject HTSUS classifications which contain no copper.

Q & A

Q 1 – Do the new Section 232 duties apply to all forms of copper?

A 1 – The duties only apply to semi-finished copper products and intensive copper derivative products. Refined copper is not covered at present.

Q 2 – Do the duties apply to the entire item for derivative copper goods?

A 2 – Copper 232 duties only apply to the value of the copper content in a derivative article, but the non-copper content is still subject to any other import duties in effect, including certain import duties established by Presidential Proclamations.

Q 3 – Is duty owed for both Section 232 copper tariffs and Section 232 Autos/Automobiles tariffs if both are applicable?

A 3 – No. If subject to Sections 232 Autos/Automobiles and 232 Copper, then 232 Copper does not apply.

Q 4 – Is duty owed for both Section 232 copper tariffs and IEEPA tariffs if both are applicable?

A 4 – No. IEEPA Reciprocal exclusion 9903.01.33 applies when Section 232 Copper is claimed with 9903.78.01.

Q 5 – What documentation should customers maintain?

A 5 – Customers must keep documentation that supports the reported value of copper and provide that information to CBP upon request. Examples include:

- bill of materials for the production of the goods
- invoices for the materials used in the production of the goods

Q 6 – Can drawback be claimed on these goods?

A 6 – Drawback cannot be filed to recover any Section 232 duties paid.

Q 7 – Does claiming a Free Trade Agreement (FTA) remove these duties?

A 7 – Claiming a trade preference does not remove the additional Section 232 duties but may be claimed as applicable to remove the column 1 duty rate and MPF.

Q 8 – How do the 232 duties affect claiming chapter 98?

A 8 –

- For HTSUS subheadings 9802.00.40 and 9802.00.50, the additional 232 duties apply to the value of repairs, alterations, or processing performed abroad.
- For HTSUS subheading 9802.00.80, the additional 232 duties apply to the value of the article less the cost or value of such products of the United States.
- For HTSUS subheading 9802.00.60, Section 232 duties apply to the full value of the imported article.
- Section 232 additional duties **do apply** to Ch 98 classifications related to FTAs: 9819, 9820, 9822, and any other Chapter 98 duty-free status based on an FTA

References

232 Exclusions Portal

<https://www.commerce.gov/page/section-232-investigations>

Adjusting Imports of Copper Into the United States (Federal Register Notice)

<https://www.govinfo.gov/content/pkg/FR-2025-08-05/pdf/2025-14893.pdf>

Adjusting Imports of Copper into the United States (The White House)

<https://www.whitehouse.gov/presidential-actions/2025/07/adjusting-imports-of-copper-into-the-united-states/>

GUIDANCE: Section 232 Import Duties on Copper and Copper Derivative Products (CSMS # 65794272)

https://content.govdelivery.com/bulletins/gd/USDHSCBP-3ebf0e0?wgt_ref=USDHSCBP_WIDGET_2

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