



GUIDE ON CUSTOMS DUTIES

Steel and aluminium



Background and Purpose

Effective March 12, 2025, the United States implemented a 25% ad valorem tariff on steel and aluminum products, including their derivatives, imported from all countries. This measure is intended to enhance domestic industry, address national security concerns, and reduce reliance on imported metals.

This comprehensive guide contains critical information on how to report correctly.

Please pay attention to this provided guidance before proceeding to ensure Axxess International can correctly report to USCBP and minimize the risk of non-compliance.

Steel Import Duties

Applicable HTSUS Classifications

HTS Code	Description & Application	Duty Rate
9903.81.87	Iron or steel products listed in subdivision (j), excluding derivative articles.	25%
9903.81.88	Iron or steel products (excluding derivatives) admitted to a U.S. foreign trade zone (FTZ) under "privileged foreign status" before March 12, 2025, and entered afterward.	25%
9903.81.89	Existing derivative steel articles already subject to Section 232 Tariffs (subdivision l).	25%
9903.81.90	New derivative steel articles classified in Chapter 73.	25%
9903.81.91	New derivative steel articles <u>not classified in Chapter 73</u> , duty based on steel content value.	25% on steel content only
9903.81.92	New derivative steel articles processed abroad from U.S.-melted and poured steel, exempt from Section 232 duties.	0% (exempt)
9903.81.93	Existing and new derivative steel articles in Chapter 73 admitted to FTZ before March 12, 2025.	25%



Melt and Pour Requirement

Steel products melted and poured in the U.S., and processed abroad may qualify for exemption under HTSUS **9903.81.92**. Documentation must verify the U.S. melt and pour origin. To report the country of melt and pour, importers must report the International Organization for Standardization (ISO) code on steel articles and derivative steel articles subject to Section 232.

For steel articles, the importer must report the ISO code where the steel was originally melted and poured. For steel derivatives, importers must report the ISO code where the steel was originally melted or “OTH” (for other countries). For products melted and poured in the United States, importers must indicate “US” as the country of melt and pour.

Steel Content Reporting

For steel derivative articles **outside** of **Chapter 73**, the 25% duty is to be reported with **HTS 9903.81.91** based upon the value of the steel content.

If the value of the steel content is the same as the entered value or is unknown, the duty must be reported under HTS 9903.81.91 based on the entire entered value, and report on only one entry summary line.

In the case where the value of the steel content is less than the entered value of the imported article, the good must be reported on two lines. The first line will represent the non-steel content while the second line will represent the steel content. Each line should be reported in accordance with the below instructions.

Non-Steel content, first line:

- Ch 1-97 HTS, this same HTS must be reported on both lines.
- Country of origin, same must be reported on both lines.
- Total entered value of the article less the value of steel content.
- Report the total quantity of the imported goods.
- Report all other applicable duties, such as IEEPA tariffs and anti-dumping and countervailing duties.



Steel content, second line:

- Same Ch. 1-97 HTS reported on the first line.
- Same country of origin reported on the first line.
- Report 0 for quantity for the Ch. 1- 97 HTS.
- Report the value of steel content.
- Report the Section 232 duties based on the value of steel content with HTS 9903.81.91.
- Report a second quantity (of the steel content) in kilograms with the HTS 9903.81.91.
- Report all other applicable duties, such as IEEPA tariffs and antidumping and countervailing duties.

Steel Reporting Example

You import industrial equipment (HTSUS 8479.89.9499) from Canada valued at \$100,000 USD, with steel components valued at \$40,000:

- **Line 1: Non-Steel Content**
 - HTSUS: 8479.89.9499
 - Entered Value: \$60,000
 - Quantity: 1 Unit
- **Line 2: Steel Content**
 - HTSUS: 8479.89.9499 + 9903.81.91
 - Entered Value: \$40,000
 - Quantity: 0
 - Duty: $\$40,000 \times 25\% = \$10,000$
 - Report steel weight in kilograms separately.



For additional details on steel, please consult

- [CSMS #64384423 – UPDATED GUIDANCE: Import Duties on Imports of Steel and Steel Derivative Products](#)
- [Federal Register – Implementation of Duties and Steel Pursuant to Proclamation 10896 Adjusting Imports of Steel Into the United States](#)

Aluminum Import Duties

A similar 25% duty applies to aluminum products and derivatives. The applicable HTSUS classifications include

HTS Code	Description & Application	Duty Rate
9903.85.02	Aluminum products excluding derivatives.	25%
9903.85.04	Existing derivative aluminum articles.	25%
9903.85.07	New derivative aluminum articles classified in Chapter 76.	25%
9903.85.08	New derivative aluminum articles not classified in Chapter 76, duty based on aluminum content.	25% on aluminum content only
9903.85.09	New derivative aluminum articles processed abroad from aluminum smelted and cast in the U.S., exempt from Section 232 duties.	0% (Exempt)
9903.85.67	200% tariff for Russian-origin aluminum products smelted or cast in Russia.	200%
9903.85.68	200% tariff for Russian derivative aluminum products containing primary aluminum smelted in Russia.	200%



Melt and Pour Requirement for Aluminum

Aluminum articles smelted and cast in the U.S. and processed abroad may qualify for exemption under HTSUS **9903.85.09**. Documentation verifying U.S. smelting and casting must be provided.

Country of Smelt and Cast Reporting

Importers must report:

- Primary and secondary countries of smelt (where aluminum was first and secondly smelted).
- Country of cast (where aluminum was cast).

Aluminum Content Reporting

If the value of the aluminum content is the same as the entered value or is unknown, duty must be reported under **9903.85.08** based on the entire entered value, and on only one entry summary line.

If the value of the aluminum content is less than the entered value of the imported article, the good must be reported on two lines. The first line will represent the non-aluminum content, and the second line will represent the aluminum content. Each line should be reported in accordance with the instructions below.

Non-Aluminum content, first line:

- Ch. 1-97 HTS, this same HTS must be reported on both lines.
- Country of origin, same must be reported on both lines.
- Total entered value of the article less the value of aluminum content.
- Report the total quantity of the imported goods.
- Report all other applicable duties, such as IEEPA tariffs and anti-dumping and countervailing duties.



Aluminum content, second line:

- Same Ch. 1-97 HTS reported on the first line.
- Same country of origin reported on the first line.
- Report 0 for quantity for the Ch. 1-97 HTS.
- Report the value of the aluminum content.
- Report the Section 232 duties based on the value of aluminum content with HTS 9903.85.08.
- Report a second quantity (of the aluminum content) in kilograms with the HTS 9903.85.08.
- Report all other applicable duties, such as IEEPA tariffs and antidumping and countervailing duties

Aluminum Reporting Example

Your company imports machinery (HTSUS 8479.89.9499) from Germany, total value \$100,000, with aluminum components valued at \$10,000:

- **Line 1: Non-Aluminum Content**
 - HTSUS: 8479.89.9499
 - Entered Value: \$90,000
 - Quantity: 1 Unit
- **Line 2: Aluminum Content**
 - HTSUS: 8479.89.9499 + 9903.85.08
 - Entered Value: \$10,000
 - Quantity: 0
 - Duty: 25% (\$2,500)
 - Report aluminum weight in kilograms separately.
 - Declare primary/secondary countries of smelt and country of cast clearly in customs documents.



For additional details on aluminum, please consult:

- [CSMS # 64384496 - UPDATED GUIDANCE: Import Duties on Imports of Aluminum and Aluminum Derivative Products](#)
- [Federal Register - Implementation of Duties on Aluminum Pursuant to Proclamation 10895 Adjusting Imports of Aluminum Into the United States](#)

How to determine the value of aluminum or steel content for derivative products outside of CH. 76 or 73?

The value of the steel/aluminum content should be determined in accordance with the principles of the Customs Valuation Agreement, as implemented in 19 U.S.C. 1401a. Thus, the value of the steel/aluminum content is the total price paid or payable for that content, which is the total payment (direct or indirect, and exclusive of any costs, charges, or expenses incurred for transportation, insurance, and related services incident to the international shipment of the merchandise from the country of exportation to the country of importation) made/to be made for the steel/aluminum content by the buyer to, or for the benefit of, the seller of the steel/aluminum content. Normally, this would be based on the invoice paid by the buyer of the steel/aluminum content to, or for the benefit of the seller of the steel/aluminum content.

Foreign Trade Zones (FTZ)

Products admitted to FTZ under privileged foreign status before March 12, 2025, but entered for consumption thereafter are subject to applicable Section 232 duties. Importers must clearly document FTZ status to ensure proper duty application.

Important Compliance Guidelines:

- Clearly differentiate steel and aluminum content during reporting.
- Maintain comprehensive documentation for melt, pour, smelt, and cast origin.
- Precisely report quantities and values to Customs to ensure compliance and avoid potential penalties.
- Regularly review Federal Register notices and CBP bulletins for updates.



Following this comprehensive guidance will help your company maintain compliance, avoid penalties, and streamline customs processes.

By following these detailed guidelines, your company will ensure compliance, avoid penalties, and streamline the customs process.

For any questions, feel free to contact our team of experts who are here to assist you!

Contact us

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