

CUSTOMER ADVISORY

U.S. Compliance Advisory
16 DECEMBER 2025



Summary of U.S. Customs and Border Protection (CBP) Guidance on Section 232 “Content Value”

The **CBP Base Metals Center** clarifies how the **Section 232** duty (under Section 232 of the Trade Expansion Act of 1962) is calculated—specifically how to separate non-steel/aluminum/copper content value.

1. Steel Articles of Chapter 72

- **100% Steel Value:** Articles of Chapter 72 are treated as **100% steel**.
- **Duty Assessment:** Section 232 duty is assessed on the **full entered value** of the article.
- **No Subtractions:** Costs for manufacturing, labor, coating, etc. are **not subtracted**.

2. Articles of Chapter 73, Chapter 76, and Elsewhere (Not Chapter 72)

- **Wholly Steel/Aluminum:** If the article is **100% steel or 100% aluminum**, the duty is assessed on the **full entered value**. No subtractions are allowed for costs like **manufacturing, labor, or coating**.
- **Non-Wholly Steel/Aluminum (Mixed Articles):** If the article contains **non-steel/aluminum parts or components**, the **Section 232 duty** is assessed **only on the steel/aluminum content**.
 - **Value Basis:** The steel/aluminum content value is what the importer paid for that content, calculated as: **Entered Value** minus **Cost of the non-steel/aluminum part/component**



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- **What is NOT Subtracted:** “Non-steel/aluminum content” **does not** refer to costs for fabrication, machining, labor, coating, paint, lacquer, or other surface treatments (e.g., galvanizing, anodizing). These costs are considered integral and **cannot be deducted**.
- **Undeterminable Value:** If the steel/aluminum content value cannot be determined, the duty must be reported using the **total entered value** on a single entry summary line.
- **Apportionment:** Costs attributable to both (e.g., packaging) should be **apportioned** between the content subject to duty and the content not subject to duty.

3. Copper and Its Alloys

- **Treated the Same:** Copper and its alloys (e.g., brass) are treated the same as steel and aluminum alloys and are subject to **Section 232 duty**.
- **No Chemical Breakdown:** The chemistry of the imported article is **not broken down** to calculate a copper-only value; the value of alloying elements **is not deducted**.

4. Documentation

- Importers must have “**documentation sufficient to support the importer’s claimed steel/aluminum content value**” if CBP requests it.

The core principle is that **manufacturing, labor, and surface treatment costs are not deductible** when determining the content value for Section 232 duty, even for mixed articles. **Subtractions are only allowed** for the cost of a **separate, non-base-metal part or component**.

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