



Commerce Department Intensifies Section 232 Probes: What Businesses Should Know About Emerging Trade Measures

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The U.S. Department of Commerce, through its Bureau of Industry and Security (BIS), continues to actively pursue investigations under Section 232 of the Trade Expansion Act of 1962. These investigations aim to determine whether specific imports threaten to impair U.S. national security. In recent months, BIS has significantly broadened the scope of its inquiries, reflecting heightened concerns over supply chain resilience, critical infrastructure, and technological competitiveness. This alert provides an overview of the currently active investigations and offers practical guidance for stakeholders, including how to participate in the public comment process.

As early as April 1, 2025, BIS began conducting investigations into the importation of copper, timber and lumber, semiconductors and semiconductor manufacturing equipment, pharmaceuticals and pharmaceutical ingredients, trucks, and processed critical minerals and their derivative products.

Since May 1, 2025, BIS has initiated three additional investigations. The first concerns commercial aircraft and jet engines, including their parts. This investigation seeks input on domestic production capabilities, foreign supply chain dependencies, and the potential impact of foreign subsidies and trade practices. The Department is especially interested in understanding whether current import patterns pose risks to national security and whether trade remedies such as tariffs or quotas may be necessary.

The second new investigation focuses on polysilicon and its derivatives. Initiated on July 1, 2025, this inquiry examines whether imports of these materials compromise national security by undermining domestic production or creating vulnerabilities in critical supply chains. BIS is soliciting public comments addressing demand forecasts, foreign supply concentration, and the feasibility of expanding domestic capacity. Submissions must be received by August 6, 2025.

The third investigation, also launched on July 1, 2025, targets unmanned aircraft systems (UAS) and their parts and components. BIS is evaluating the extent to which foreign-built UAS and related imports may pose national security risks, including through supply chain control or embedded technological capabilities. Stakeholders are encouraged to provide data and analysis on domestic production, foreign market dynamics, and the potential for adversarial exploitation of UAS technologies. Comments are due by August 6, 2025.

Given the breadth and potential impact of these investigations, companies should take proactive steps to assess their exposure and consider submitting comments or data to the relevant dockets, where able. Stakeholder input

can influence the Department's findings and shape future trade policy decisions. Businesses are also advised to monitor developments closely, as outcomes may include the imposition of tariffs, quotas, or other trade remedies that could affect operations and supply chains.

Below is a list of the active Section 232 Investigations.

Copper – Initiated March 10, 2025

- [Federal Register Notice](#)
- Regulations.gov Docket ID: BIS-2025-0010

Timber and Lumber – Initiated March 10, 2025

- [Federal Register Notice](#)
- Regulations.gov Docket ID: BIS-2025-0011

Semiconductors and Semiconductor Manufacturing Equipment – Initiated April 1, 2025

- [Federal Register Notice](#)
- Regulations.gov Docket ID: BIS-2025-0021

Pharmaceuticals and Pharmaceutical Ingredients – Initiated April 1, 2025

- [Federal Register Notice](#)
- Regulations.gov Docket ID: BIS-2025-0022

Trucks – Initiated April 22, 2025

- [Federal Register Notice](#)
- Regulations.gov Docket ID: BIS-2025-0024

Processed Critical Minerals and Derivative Products – Initiated April 22, 2025

- [Federal Register Notice](#)
- Regulations.gov Docket ID: BIS-2025-0025

Commercial Aircraft and Jet Engines – Initiated May 1, 2025

- [Federal Register Notice](#)
- Regulations.gov Docket ID: BIS-2025-0027

Polysilicon and its Derivatives – Initiated July 1, 2025

- [Federal Register Notice](#)
- Regulations.gov Docket ID: BIS-2025-0028

Unmanned Aircraft Systems (UAS) and Their Parts and Components – Initiated July 1, 2025

- [Federal Register Notice](#)
- Regulations.gov Docket ID: BIS-2025-0059

For further guidance or assistance, please contact the Winston & Strawn LLP International Trade team.

Jasmine A. Bovia, law clerk, co-authored this blog.

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Authors

- [Cari Stinebower](#)
 - [Amanda M. Simpson](#)
 - [John Arszulowicz](#)
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[Cari Stinebower](#)



[Amanda M. Simpson](#)



John Arszulowicz

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