

Comments of
MEMA, The Vehicle Suppliers Association
to the
Department of Commerce
Bureau of Industry and Security
on the
Notice of Request for Public Comments on
Adoption and Procedures of the Section 232 Steel and Aluminum Tariff
Inclusions Process
June 16, 2025
Docket No. 250428-0073

Introduction

MEMA, The Vehicle Suppliers Association, established in 1904, is the leading trade association in the U.S. for vehicle suppliers, parts manufacturers, and remanufacturers. The mobility sector depends on the resiliency and strength of suppliers. MEMA's members design and manufacture the technology, components and services that enable the production of new vehicles as well as the essential maintenance and repair of the more than 295 million highway vehicles that are currently on the road in the U.S.

Our sector is an intrinsic and essential part of the U.S. economy. Vehicle suppliers employ more than 930,000 direct individuals and operate facilities in all 50 states and in more than 350 Congressional districts, with significant concentrations in the Midwest and Southeast. The supplier sector has also added jobs from different types of businesses and professional backgrounds, reflecting the dynamic and evolving nature of the industry.

MEMA welcomes the opportunity to respond to the Bureau of Industry and Security's (BIS) interim final rule (IFR) on the "Adoptions and Procedures of the Section 232 Steel and Aluminum Inclusions" process.

¹ MEMA urges BIS to consider refining the process to provide greater specificity and, therefore, more balanced input opportunities to all parties interested in the inclusions process.

Summary of Key Points

¹ [Federal Register :: Adoption and Procedures of the Section 232 Steel and Aluminum Tariff Inclusions Process](#)

MEMA appreciates the ability to provide comments to BIS on its IFR, the “Adoption and Procedures of the Section 232 Steel and Aluminum Inclusions” process. MEMA urges that BIS consider adjustments to the stated process, which would allow for a more balanced approach to a range of manufacturing sectors:

- Provide a longer period of time for each of the steps articulated in this process, from the commencement of the filing process to the review of the comments posted and the ability to respond to the items submitted.
- Add a structured opportunity for public comment after formal requests are submitted for BIS’ consideration.
- Limit the scope of proposed inclusions to the portion of an HTS code that actually contains steel and aluminum.
- Provide a schedule for all stakeholders which details when the results and decisions will be announced and then implemented (e.g. 90 days from notification to actual implementation).
- Consider allowing for additional viewpoints and perspectives to be collected and considered as part of the process by convening a hearing. Further, all stakeholders would benefit from an opportunity to provide information and data in response to each petition.
- Establish a process to withdraw a designated derivative product.

While these comments are specific to the steel and aluminum Section 232 process, MEMA requests that these points be considered as the Administration seeks to implement any subsequent 232 inclusions processes and comment periods.

Recommendations:

First, MEMA requests that BIS provide additional time to file comments. Companies need a minimum of six weeks to review the comment opportunity, conduct internal analysis, and develop a robust submission or response. Stakeholders will require time to consider both operational and commercial implications as part of this overarching process. Further the resources must be identified and set aside for the company to prepare the necessary documentation.

Second, a public comment period should be added to the inclusion IFR process. This would establish a dialogue between stakeholders and BIS. A public process would allow for meaningful interactions, deeper inquiries, and the opportunity to elaborate on points provided in written testimony. BIS should provide greater specificity relative to the notification process and mechanisms for companies to engage with respect to an inclusion petition. As this is a new process, relevant entities may not know where to find information, assess their eligibility for participation in any of the steps and/or be cognizant of what is under consideration as part of the process (e.g. the specific 58 products).

MEMA also strongly recommends that BIS publish a clear set of criteria to explain which items are eligible for this process. These parameters should exclude items which do not include steel or aluminum. There are situations where an HTS code may cover both steel/aluminum and non-steel/aluminum products. One solution would be to use a Section 232 derivative Chapter 99 number rather than HTS codes so that differentiation can be made. In addition, supplementary text from BIS stating who is eligible to participate in each step of the process would be welcomed and would assist in dispelling any misperceptions. MEMA recommends that any final inclusions be based solely on items that were the subject of active petitions provided to BIS through the docket. Without a clear petition, it will not be

possible for stakeholders to anticipate an addition to the list or to assess the reasoning for this adjustment. Further, the industry requests that BIS assess the availability of a particular item in the United States as part of the overall review and determination process.

Fourth, MEMA requests that BIS provide a more detailed schedule of comment submission deadlines, posting of comments to the docket and BIS' response to comments. This would provide greater transparency and clarity for participants.

Finally, MEMA urges BIS to follow the precedent set by prior mechanisms and create an annual review for each determination.

Conclusion

MEMA, The Vehicle Suppliers Association, appreciates this opportunity to provide input on the vital process concerning inclusions to the Section 232 tariffs. Greater transparency and specificity, as suggested above, would assist relevant stakeholders, and allow for a more robust process. The changes proposed in this document would further enable a more balanced approach for all relevant entities. BIS would, subsequently, have access to a broad range of views, perspective, and information as it seeks to make its final determinations.

Please do not hesitate to contact Ana Meuwissen, ameuwissen@mema.org, or Bill Frymoyer, bfrymoyer@mema.org, with any questions.