Steel Derivatives

March 12, 2025

CBP has issued a Cargo Systems Messaging Systems message concerning steel derivatives and U.S. melt and pour content.

The message is here: https://content.govdelivery.com/accounts/USDHSCBP/bulletins/3d66da7

Of note:

Melt and Pour Reporting Requirements

The reporting of the country of melt and pour and applicability code is mandatory for both steel and steel derivatives. 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, 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.

Reporting Instructions for Duties Based on Steel Content

For new steel derivatives outside of Chapter 73, the 25 percent 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 antidumping 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.