

Commerce Department Announces New Section 232 Investigations on Polysilicon and its Derivative Products and Unmanned Aircraft Systems and Parts and Components Thereof

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July 15, 2025

On July 14, 2025, the Commerce Department announced new investigations initiated by the Secretary of Commerce on July 1, 2025, pursuant to Section 232 of the Trade Expansion Act of 1962. The pre-publication Federal Register notices announcing the investigations for [polysilicon](#) and its derivative products and [unmanned aircraft systems](#) and their parts and components note that the agency is particularly interested in receiving information pertaining to regulatory factors for analysis as they affect national security as well as any other relevant factors. Comments from interested parties for both of these investigations are due by **August 6, 2025**, and should be filed via www.regulations.gov.

Unlike other recent Section 232 investigation announcements and requests for comment, these notices do not specify the exact types of products under investigation. These announcements bring the number of Section 232 investigations initiated so far in President Trump's second term to nine cases, summarized in the chart below and accessible on the [agency's website](#). In addition, last week, the President announced via social media that he had received the national security assessment concerning the Section 232 investigation on copper, [stating](#) that imported copper products will be subject to a 50 percent tariff effective on August 1, 2025. These investigations, therefore, appear to be moving quickly and ahead of the 270-day timeline allotted to the Commerce Department under the statute to investigate the imports at issue and report its findings and recommendations to the President.

Section 232 Investigation Product	Deadline for Comments from the Public	Federal Register Notice
Polysilicon and its Derivative Products	August 6, 2025	<i>Publication forthcoming</i>
Unmanned Aircraft Systems and their Parts and Components	August 6, 2025	<i>Publication forthcoming</i>

Commercial Aircraft and Jet Engines and Parts for Commercial Aircraft and Jet Engines	June 3, 2025	90 Fed. Reg. 20,273 (May 13, 2025)
Critical Minerals and their Derivative Products	May 16, 2025	90 Fed. Reg. 17,372 (Apr. 25, 2025)
Trucks, Truck Parts, and their Derivative Products	May 16, 2025	90 Fed. Reg. 17,371 (Apr. 25, 2025)
Pharmaceuticals and Pharmaceutical	May 7, 2025	90 Fed. Reg. 15,951 (Apr. 16, 2025)
Ingredients and their Derivative Products		
Semiconductors and Semiconductor	May 7, 2025	90 Fed. Reg. 15,950 (Apr. 16, 2025)
Manufacturing Equipment		
Timber and Lumber and their Derivative Products	April 1, 2025	90 Fed. Reg. 11,941 (Mar. 13, 2025)
Copper and Derivative Products	April 1, 2025	90 Fed. Reg. 11,940 (Mar. 13, 2025)

Kelley Drye's [International Trade team](#) is experienced in helping clients navigate Section 232 investigations and understanding the implications of Section 232 measures.