



October 21, 2025

The Honorable Howard W. Lutnick
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

RE: Section 232 Steel and Aluminum Tariff Inclusions; Docket ID BIS-2025-0023

Dear Secretary Lutnick:

On behalf of the Travel Goods Association (TGA), I am providing these comments in response to the subject request.

The U.S. travel goods industry is comprised of small, mostly family-owned businesses that make, market, and sell travel goods – luggage, totes, backpacks, handbags, and other products for people who travel. Despite 99% of the travel goods sold in the United States being imported, we proudly employ 100,000 American workers today.

TGA does not believe that Section 232 coverage should be expanded to include aluminum derivatives for the following 12 tariff lines: 4202.12.21, 4202.12.29, 4202.12.40, 4202.12.60, 4202.12.81, 4202.12.89, 4202.99.10, 4202.99.20, 4202.99.30, 4202.99.50, 4202.99.90, and 6306.22.9030, as submitted by the Aluminum Extruders Council.

U.S. imports of these products have increased over the past decade due to the absence of domestic production. Because there are no U.S. manufacturers producing these items at commercial scale for the domestic market, importers must source them from global trading partners. Further, according to the data provided in the attached Appendix, only five of the tariff lines saw increased imports in 2024 compared to 2023 by value.

Moreover, these products contain minimal aluminum, if any at all. While certain items may include small components such as frames, screws, pins, or turn locks, these elements are minor and inconsequential and do not warrant classification as derivatives. The challenge is that, as we understand it, importers must be able to designate the percentage of aluminum or steel in the product; otherwise, they are required to pay a 50 percent duty on the entire value. However, to our knowledge, no entity currently has access to that level of detail or the ability to transmit such data in a usable format. Including such products as derivatives of aluminum represents a significant and unwarranted expansion of the definition and establishes a concerning

precedent. Products classified as derivatives should be genuine derivatives of aluminum, not items that merely “may include a small metal screw.” Furthermore, the requestor’s submission provides no evidence of harm to domestic aluminum producers associated with these specific tariff lines.

In conclusion, TGA does not believe that these tariff lines constitute derivatives of aluminum and does not support expanding Section 232 coverage or imposing additional tariffs on them. In the absence of evidence demonstrating harm to domestic aluminum producers, TGA respectfully requests that the inclusion request submitted by the Aluminum Extruders Council be denied.

Thank you for your time and consideration in this matter.

Sincerely,



Nate Herman
 Director, Government Relations
 Travel Goods Association (TGA)

Attachment: Appendix - Import Data

Appendix – Import Data

HTS Number	2020	2021	2022	2023	2024
6306229030	\$274,295,957	\$433,312,099	\$481,703,737	\$291,071,299	\$296,685,859
42021221	\$294,983,416	\$554,485,585	\$919,239,878	\$856,578,124	\$903,891,413
42021229	\$32,292,468	\$46,230,387	\$40,775,608	\$26,238,371	\$26,435,780
42021240	\$8,108,161	\$10,734,623	\$24,335,604	\$33,453,996	\$20,328,822
42021260	\$6,777,967	\$11,420,223	\$12,374,366	\$11,299,486	\$11,043,472
42021281	\$234,906,667	\$268,688,093	\$440,955,063	\$377,527,801	\$357,251,726
42021289	\$14,980,772	\$21,808,774	\$28,689,655	\$25,329,136	\$24,287,550
42029910	\$17,949,738	\$27,865,484	\$29,574,809	\$24,615,849	\$27,670,875
42029920	\$251,366	\$534,438	\$367,986	\$457,608	\$436,191
42029930	\$1,200,360	\$1,517,336	\$1,595,465	\$1,489,541	\$3,263,603
42029950	\$2,017,232	\$4,383,533	\$5,918,640	\$5,409,215	\$5,219,599

42029990	\$133,047,98 4	\$133,366,383	\$103,746,192	\$74,266,434	\$71,971,454
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Source: Trade Dataweb, U.S. International Trade Commission (USITC), <https://dataweb.usitc.gov/>