Section 232 / 122 HTS Classification Checklist

A working checklist for Turkey-origin machinery buyers to confirm which US tariff regime — Section 232 or Section 122 — governs a specific shipment before commercial commitment. Companion to the Insight "Section 232 vs Section 122: Which Tariff Governs Your Turkey Machinery Import (2026)."

STEP 1 — CLASSIFY THE SHIPMENT

1. Confirm the current HTS classification

For the specific machine or component, with the supplier or freight forwarder. Chapter 84 (machinery) and Chapter 85 (electrical equipment) carry the bulk of Section 232 derivative-article coverage; the covered-product annex was expanded again in June 2026.

2. Confirm whether the classified line is on the current Section 232 covered-derivatives annex

If it is, Section 232 duty generally governs and Section 122 does not additionally apply to that line.

3. If Section 232 does not apply to the line, confirm current Section 122 status

Section 122 is a temporary measure under active litigation, scheduled to expire July 24, 2026 — a status confirmed one month is not guaranteed current the next.

4. Request the qualifying metal-content share only if claiming the de minimis exception

The sub-15%-by-weight exception. For machinery classified under covered HTS lines, this exception will typically not apply — assume full customs value until confirmed otherwise.

5. Reconcile the applicable regime into landed cost before commercial commitment

A cost estimate built on a prior classification cycle (pre-April, or pre-June 2026) is very likely out of date.

6. Document the classification basis in writing, dated

Informal assurances from a supplier or forwarder about "which tariff applies" are not a substitute for a documented, dated HTS classification.

QUICK DECISION LOGIC

Is the HTS line on the Section 232 covered-derivatives annex?	Section 232 applies — full customs value in most cases, up to 50%. Section 122 does not additionally apply.	Go to next question — Section 122 is the applicable regime, subject to status.
Has Section 122 expired, or been struck down on appeal, as of the entry date?	No Section 122 surcharge applies — confirm the date against CBP guidance.	10% global surcharge applies under Section 122.

BEFORE YOU REQUEST QUOTATIONS FROM TURKISH MACHINERY SUPPLIERS

HTS classification for the specific machine or component

Current as of this month, not a prior cycle.

Which regime governs that classification

Section 232 covered-derivatives annex, or the Section 122 global baseline.

Supplier and CE documentation status

A separate verification, not a tariff exemption.

RFQ structure

Incoterms, documentation scope, and commercial terms standardised across suppliers before quotations are compared.

Landed-cost model

Rebuilt against current tariff status, not a prior quarter's estimate.

This checklist does not constitute customs, trade, or legal advice, and does not substitute for a licensed customs broker's classification of a specific shipment. Tariff rates, chapter coverage, litigation status, and expiration dates reflect publicly available guidance as of July 13, 2026, and are subject to change — always confirm current status before a shipment is committed. Last reviewed: July 13, 2026.

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Independent buyer-side procurement governance for Turkey-origin sourcing — sourcing direction, supplier verification, RFQ governance. No trading, no commission, no supplier affiliation.