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Trump administration executive action alert

Executive order on “Addressing the Threat to National Security from Imports of Copper”

25 February 2025

[Text of executive order](#); [White House fact sheet](#)

Key highlights

- On 25 February, President Trump signed an executive order (EO) aimed at “Addressing the Threat to National Security from Imports of Copper.” The order instructs the Department of Commerce to initiate an investigation under Section 232 of the Trade Expansion Act to determine whether US dependence on imports of copper pose a threat to national security.
- The EO emphasizes the critical role of copper, in all its forms, in the US economy and defense capabilities. It calls for a report that includes recommendations for addressing vulnerabilities in the copper supply chain and the negative impacts of foreign competition on domestic industries. This may involve implementing trade remedies, such as tariffs or import quotas.
- While the order itself does not name specific countries that will be scrutinized, the accompanying factsheet highlights China’s control of 50% of global copper smelting.
- The order builds on Trump’s second term executive actions on trade, which include mandating a complete review of US trade policy, restoring a true 25% tariff on all steel imports, elevating tariffs on all aluminum imports to 25%, implementing a 10% additional tariff on imports from China, unveiling the “Fair and Reciprocal Plan” to address non-reciprocal trade, and the consideration of tariffs to combat digital service taxes (DSTs) and other discriminatory non-trade barriers.
- **Timing:**
 - No immediate tariffs or policies announced. Rather, the report recommendations will need to be delivered to the president by 22 November 2025.
- **Key elements of the memorandum:**
 - The types of copper products in the scope of the investigation include raw mined copper, copper concentrates, refined copper, copper alloys, scrap copper and derivative products.

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- In assessing the impact of copper imports on national security, the relevant agencies will investigate:
 - Current and projected demand for copper in US defense, energy and critical infrastructure sectors
 - The extent to which domestic production, smelting, refining and recycling can meet demand
 - The role of foreign supply chains, particularly from major exporters, in meeting US demand
 - The concentration of US copper imports from a small number of suppliers and the associated risks
- In assessing the impact of foreign competition on domestic industries, the relevant agencies will investigate factors including:
 - The impact of foreign government subsidies, overcapacity and predatory trade practices on US industry competitiveness
 - The economic impact of dumping and state-sponsored overproduction
 - The potential for export restrictions by foreign nations, including the ability of foreign nations to weaponize their control over refined copper supplies
 - The feasibility of increasing domestic copper mining, smelting and refining capacity to reduce import reliance
 - The impact of current trade policies on domestic copper production
- The report must assess whether US national security is threatened by its dependence on copper imports. It also must include recommendations about measures to mitigate the threats, including tariffs, export controls or incentives to increase domestic production and policy recommendations to strengthen the US supply chain. These include strategic investments, permitting reforms and recycling initiatives.

Additional

■ What's next

- The Department of Commerce will investigate and provide recommendations in consultation with the Secretaries of Defense, Interior and Energy, among others.
- While the order provides the agencies with 270 days to provide recommendations, administration officials have indicated Commerce Secretary Howard Lutnick plans to move as “quickly as possible.”¹

■ Reactions

- While China's dominance of copper smelting capacity is mentioned as a concern, most US copper imports are supplied by Chile, Canada, Peru, Congo (DRC) and Mexico.²
- Chile's foreign ministry indicated it is “monitoring” the investigation.³

¹ McCormick, Myles, “US orders probe into copper dumping, opening door to new tariffs,” *Financial Times*, 25 February 2025, <https://www.ft.com/content/fd1f5a11-4e67-4fd5-9e08-da997a2efcde>.

² Jackson, Lewis and Lv, Amy, “Where does the US get its copper?” *Reuters*, 25 February 2025, <https://www.reuters.com/markets/commodities/where-does-us-get-its-copper-2025-02-26/>.

³ Cambero, Fabian, “Copper giant Chile monitoring US probe into potential metals tariffs,” *Reuters*, 26 February 2025, <https://www.reuters.com/markets/commodities/copper-giant-chile-monitoring-us-probe-into-potential-metals-tariffs-2025-02-26/>.

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