

To all affected
business partners and customers

74523 Schwaebisch Hall
04.02.2026

Information letter

Challenges in Providing Origin Data under US Section 232 for Electronic Assemblies

Dear Sir or Madam,

Thank you very much for your message and for the documents and explanations you provided regarding the implementation of the updated requirements under the **U.S. Section 232 regulations**. We understand that the specifications concerning “Country of Melt/Pour” or “Smelt/Cast,” as well as the separate reporting of metal contents and values for steel, aluminum, and copper, have meanwhile become key prerequisites for smooth customs clearance of imports into the United States.

After careful review, we must inform you that we are currently unable to provide the requested level of detailed information for our small and complex electronic assemblies in the required format. Our products consist of a wide variety of individual components and preliminary materials sourced from multiple suppliers. For these upstream materials, we generally do not have continuous access to Mill Test Certificates or to complete data on the “Country of Smelt/Cast” or “Melt/Pour,” nor to precise metal weight fractions at individual material number level. A retroactive, gapless traceability of the melt and cast origins of every contained metal portion would only be possible with considerable manual effort, deep interventions into our supply chain, and additional audit and documentation processes across all stages of the value chain.

Furthermore, it cannot be ensured at this time that all our suppliers will be able to permanently and consistently provide the data required for Section 232 purposes in the demanded granularity. Various industry sources and practical guidance documents indicate that even large industrial companies are still in the process of gradually adapting their systems, supplier contracts, and master data to the new U.S. melt/smelt reporting obligations — for example, through enhanced supplier declarations, IT-supported origin documentation, or the use of trade-compliance platforms. A stable, end-to-end process for our highly diversified electronics production can therefore realistically only be achieved in the medium term and would have significant organizational and financial impacts on our product costing and supply chain structures.

We would like to emphasize that we fully recognize the regulatory significance of the Section 232 provisions and the U.S. importer’s obligation to exercise “reasonable care” regarding melt and origin reporting. At the same time, current CBP guidance and industry recommendations acknowledge that, where data is unavailable or cannot reasonably be determined (for example, by using “UN/unknown” or specific codes), higher tariff rates of up to 200 % may need to be accepted, while full, gapless data collection often reaches practical limits in complex supply chains. In this context, we consider the proportional benefit of the level of detail requested to be rather limited in relation to the considerable effort and structural changes required in our processes.

Should it become apparent in the future that such an in-depth, item- and batch-specific documentation of metal origins is a mandatory prerequisite for continued supply of the U.S. market, we would have to initiate a comprehensive project together with our upstream suppliers and service providers to redesign our material flow, procurement, and documentation processes, taking into account the resulting additional costs in our product calculations. Gradual or tiered solutions might be conceivable, such as focusing on particularly affected product groups or HTS positions, implementing standardized supplier declarations regarding countries of melt and cast, and increasingly relying on certified raw materials with existing complete origin documentation.

In view of the above, we kindly ask you to review the situation internally and assess whether, for our specific electronic assemblies, a pragmatic, risk-based approach or a phased implementation might be acceptable. If you have concrete proposals or established best-practice approaches from other supplier relationships (e.g., simplified reporting, aggregate declarations, or a focus on specific raw-metal components or threshold values), we would be pleased to discuss these options with you.

We appreciate your understanding and cooperation and remain at your disposal for any questions or to arrange a joint meeting — including with your customs or trade-compliance department, if desired.

ZIEHL industrie-elektronik GmbH + Co KG



ppa. Andreas Kaßen