



IVSH
Industrieverband Schneid- und
Haushaltwaren

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Relevant National MEP

26.09.2025

Urgent Appeal for Stronger Representation of European Household , Cookware and Cutlery Sector in Section 232 Negotiations

Dear Executive Vice-President Šefčovič,

We are writing to you jointly as representatives of the German national industry association, the European federation FEC - Federation of the European Cookware & Cutlery, and our French counterpart FCC, to express our deep concern regarding the ongoing impact of the United States tariffs and especially Section 232 tariffs on steel, aluminum, and their derivative products.

Our sector—comprising household goods, cookware, bakeware, metalware, and cutlery manufacturers—is heavily affected by these measures. The vast majority of our product groups, including key HTS codes such as:

<u>Product category</u>	<u>US HTS code</u>	<u>EU tariff code</u>
Stainless steel tableware & kitchenware	7323.93.00	732393

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Steel enamelled tableware & kitchenware	7323.94.00	732394
Iron or steel table, kitchen or other household articles	7323.99.70	732399
Aluminum table, kitchen or other household articles	7615.10.3025	761510
Knives with fixed blades	8211.91 - 8211.92	821191, 821192
Spoons, forks, ladles, skimmers, and similar	8215.10 - 8215.99	821599, 821520

are now subject to additional 50% tariffs on steel / aluminum value in the goods. As you well know, our products have a high metal content and thus a very high value of the articles is subject to 50% rate. These products are not only essential consumer goods but also represent a highly specialized and value-adding segment of European manufacturing and manufacturing jobs. With such a high tariff rate, EU-made cookware and cutlery products have no possibility to compete in the U.S. market with locally manufactured products.

Based on the EU and US Joint Statement on transatlantic trade and investment we understand that parties are negotiating on a tariff rate quota solution for EU exports of steel, aluminum and their derivatives and would like to appeal for inclusion of cookware and cutlery HTS code in the exemption quotas.

In this context, we are particularly alarmed by the Commission's recent proposal and initiative COM(2025)471, which aims to suspend EU import duties on a wide Range of industrial U.S.-origin goods. This measure directly affects product categories central to our industry and risks creating further structural disadvantage for European manufacturers.

The proposed suspension of EU import duties on U.S. products such as cookware, kitchenware, and cutlery—many of which fall under HTS codes groups 73, 76 and 82 —risks creating a severe imbalance. While U.S. exporters would benefit from duty-free access to the EU market, our European manufacturers would remain burdened by high U.S. tariffs under Section 232 and baseline tariffs. We urge the Commission to ensure that any such measures are reciprocal and do not further erode the competitiveness of EU-based producers.

Moreover, in line with President von der Leyen's 27 July statement, both sides agreed to continue working to extend the special regime with only MFN applying (no reciprocal tariffs) for additional product groups. We would like to request negotiating an extension of such special regime to European heritage products with more than 100 years of tradition - enameled cast iron cookware (U.S. HTS code 7323.92.00, EU tariff code 73239200). These products are intertwined with the European heritage and know-how and there has never been U.S. production capacity sufficient to meet domestic demand for

such products in the U.S. We urge the European Commission to give greater strategic attention to our sector in the ongoing negotiations. Our industry is characterized by:

- A predominantly SME structure, deeply embedded in local economies across Europe.
- High levels of domestic production, with value creation taking place within the EU.
- Use of European steel and aluminum, thus supporting the primary industries.
- A significant contribution to employment, with tens of thousands of jobs in the EU and billions of sales and revenue.
- A strong export orientation, with the United States being a key market for many of our members.
- European heritage products with more than hundred years of tradition and know-how.

While we recognize the complexity of negotiating with the U.S., we are increasingly concerned that the continued use of Section 232 instruments and reciprocal tariffs amounts to a de facto escalation of trade barriers. This creates volatility and planning uncertainty, making long-term investment and supply chain decisions extremely difficult for our companies.

We therefore respectfully ask:

- That our sector be given greater visibility and priority in the EU's trade strategy and negotiations with the United States.
- That the European Commission explore targeted exemptions or quota adjustments for our product categories.
- That the Commission provide additional guidance and support mechanisms for affected companies, including access to relevant contacts and procedures.

We are eager to engage in a constructive and ongoing dialogue on how to ease the burdens of the additional unilateral tariff by the US with you and your team.

Thank you for your attention and commitment to defending Europe's industrial interests.

Sincerely,

A stylized, handwritten signature in blue ink, consisting of a large, flowing 'B' followed by a horizontal line.

Olivier Brault
FEC President

A stylized, handwritten signature in black ink, featuring a large, bold 'K' and 'R' followed by a horizontal line.

Jan-Frederik Kremer
CEO IVSH



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Haushaltwaren

About IVSH

The Industrieverband Schneid- und Haushaltwaren e.V. (IVSH) / German Association of Cook- and Houseware, Cutlery and related Industries represents companies in the cutting and household goods industry across Germany. This industry is responsible for thousands of jobs and billions in revenue in Germany. The sector produces high-quality everyday products that are appreciated and loved worldwide and contribute to social cohesion.

About FEC

The FEC was founded in 1952 to represent the interests of European manufacturers of cookware, cutlery, cutlery parts, and household articles. It promotes cooperation among its members, provides assistance and support for economic and technical improvements, works on defining technical standards, and officially represents the common interests of its members to international authorities, particularly the European Commission in Brussels.

Contact:

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