



BABAA Overview

June 2026

An Overview of the Build America, Buy America Act (BABAA), How It Differs from the Buy America Act (BAA), and How Symmons Products Comply

What is the Build America, Buy America Act?

The Build America Buy America Act (BABAA) was enacted on November 15, 2021, under Division G, Title IX of the Infrastructure Investment and Jobs Act. BABAA establishes a domestic content procurement preference requirement to federally funded public infrastructure projects with the goal of increasing a reliance on domestic supply chains and manufacturing supply.

The BABAA applies to three separate product categories purchased under financial assistance awards for infrastructure projects; iron or steel products; manufactured products; and construction materials unless a waiver or exception applies.

The act prioritizes domestic production and procurement of infrastructure products and components, and as a result it aims to increase U.S.-based jobs, boost economic reliance by reducing dependence on foreign supply chains, and empower local businesses to contribute to our nation's growth.

All federally funded jobs require BABAA compliance, and all BABAA-certified products require at least 55% of domestic cost of the product to be manufactured in the USA.

BABAA in the Plumbing Industry

Plumbing Industry Overview

BABAA affects the plumbing industry mainly when plumbing work is part of a federally funded infrastructure project, especially water, wastewater, and building projects. In those jobs, the pipe, fittings, valves, fixtures, pumps, and other covered materials often have to meet BABAA's U.S.-origin requirements, or the project needs a waiver.

Waivers Specific to Plumbing

Federal housing and community-development programs have already had to consider “nonavailability waivers” for plumbing fixtures, accessories, and water-flow devices where compliant U.S. production or supply was insufficient for specific affordable-housing projects.

These waivers are typically narrow and project-specific, signaling that agencies still expect the market to move toward more U.S.-made plumbing options over time.

How Does BABAA Differ from BAA?

For plumbing manufacturers, the recipient of the product sale is the main difference between the Build America, Buy America Act and the Buy American Act. These two programs also differ in the required percentages of domestic components:

- **BAA:** affects sales **directly to the federal government**; therefore, manufactured products must be greater than 75% of domestic components and greater than or equal to 95% domestic for iron and/or steel. A COTS (*Commercially Available Off-The-Shelf*) waiver can be used for BAA products.

A COTS waiver is an exemption for Commercially Available Off-The-Shelf items under the Buy American Act (BAA). This waiver allows federal agencies to buy certain commercial products without requiring compliance with domestic-content rules (country-of-origin requirements).

- **BABAA:** affects plumbing products **sales for federally assisted projects (not directly to the federal government)**, such as water/sewer, school, housing, and infrastructure projects. BABAA-compliant projects must show U.S. melt-and-process for iron/steel and greater than or equal to 55% domestic components for manufactured plumbing products and be prepared for recipient certification requests.

In short, BABAA is broader yet stricter for plumbing products, especially for iron/steel pipe, valves, and fittings, and creates more documentation requirements across the supply chain.

Documentation Required to Certify BABAA Compliance

General Documentation Requirements

Contractors and project owners will depend on plumbing manufacturers that can provide clear BABAA compliance documentation (*country of manufacture, component content, and certification letters*) because recipients must be able to produce proof of compliance to the funding agency or auditors.

The documentation needed to prove compliance with BABAA/BABA domestic-content certification for federally assisted projects must include:

- A manufacturer self-certification letter provided to the contractor/subgrantee/prime recipient.
- The self-certification letter must confirm that the specific plumbing product(s) are produced in the U.S. and meet the required domestic-content thresholds:
 - Iron/steel: all melting, processing, and manufacturing (including coatings) in the U.S.
 - Manufactured products: $\geq 55\%$ domestic component cost (unless another standard applies).
 - Construction materials: all manufacturing processes in the U.S.

There is no standard letter format at this time, but best practices indicate the letter should include:

- Manufacturer information: name, address, contact, and signatory.
- Product details: model names/numbers, descriptions, and any unique identifiers.
- Statement of compliance: explicit confirmation that the product meets BABAA/BABA domestic-content requirements for the category (iron/steel, manufactured product, or construction material).
- Domestic-content basis:
 - For iron/steel: confirmation that melting, all manufacturing, and coatings occurred in the U.S.
 - For manufactured products: statement that domestic component cost $\geq 55\%$ of total component cost, consistent with 2 CFR 184.
- Scope of the project(s), awards, or programs the certification covers (if known).
- Date and signature of an authorized representative.

Manufacturers that can certify compliance will gain an advantage in bids for federally assisted work in municipal water/wastewater, schools, hospitals, public housing, and other public facilities.

Requirements Specifically for Symmons

To prove compliance, the manufacturer (Symmons) must provide a BABAA self-certification letter to the contractor or project manager, clearly covering all of the requirements covered in General Documentation Requirements listed above.

Since products made by Symmons fall into the “Manufactured Products” category for BABAA, the letter must confirm that the specific plumbing product(s) are produced in the U.S. and meet the required domestic-content threshold for Manufactured Products of $\geq 55\%$ domestic component cost.

Key BABAA-Compliant Symmons Products

In general, a large percentage of the Symmons products in the categories listed below are BABAA compliant, however there are some rare exceptions so check the latest SKU update list to confirm.

- Temptrol® valve bodies, SafetyMix® shower systems, and Visu-Temp® shower systems
- TempControl® DMV and TMV, and MaxLine® TMV valves
- HydaPipe® and ShowerOff® systems
- SCOT® faucets and metering
- Origins® kitchen and lavatory faucets
- Origins® tub/shower/hand shower systems
- Symmetrix® lavatory faucets

To locate BABAA-compliant Symmons products/SKUs, use the Special Attributes filter on the Symmons Product search tool, and check the “Build America, Buy America Act” box:



For BABAA-related questions and requests, contact [Rob Furioso, Manager of Codes and Standards](#).

Resources

Reference	URL
Associated General Contractors – ACG	https://www.agc.org/babaa-resource-hub
National Association of Home Builders	https://www.nahb.org/advocacy/industry-issues/build-america-buy-america-act
U.S. Department of Agriculture	https://www.usda.gov/about-usda/general-information/staff-offices/office-chief-financial-officer/federal-financial-assistance-policy/build-america-buy-america-baba-act
U.S. Department of Energy – BABAA Overview	https://www.energy.gov/management/build-america-buy-america
U.S. Department of Housing and Urban Development	https://www.hud.gov/hud-partners/baba
U.S. Environmental Protection Agency – BABAA Overview	https://www.epa.gov/baba/build-america-buy-america-baba-act-overview