

DATE: August, 2023
REGARDING: **“Build America, Buy America (BABA)” Requirements for Steel Framing**

Typically, “Buy America” refers to the *Buy America, Surface Transportation Act of 1982*. However, there are five other regulations with very similar provisions that are commonly referred to as “Buy America”. List as follows:

1. Buy America, Surface Transportation Assistance Act of 1982 (STAA)
2. American Iron and Steel Requirements (AIS) (part of Consolidated Appropriations Act of 2014)
3. Federal Aviation Administration (FAA) (49 U.S.C. 50101)
4. Federal Railroad Administration (FRA) (49 U.S.C. 24405)
5. National Railroad Passenger Corporation (AMTRAK) (49 U.S.C. 24305)
6. Federal Transit Administration (FTA) (49 U.S.C. 5323)

There are relatively new statutes that do not fall neatly under the “Buy America” descriptions. These new statutes, however, have similar requirements related to the content of steel or iron products. These are:

1. **Build America, Buy America Act (BABA) (part of Infrastructure Investment and Jobs Act)**
2. Inflation Reduction Act (applies to qualified clean energy projects)

These regulations all require 100% domestic made steel, meaning that all steel making processes, excluding the extraction and mining of the raw materials must take place in the United States. You can find more information on the steel making process here: [Steelmaking - worldsteel.org](https://www.worldsteel.org/en/don%E2%80%99t-panic-what-is-steel-making/). Note that ClarkDietrich is not a steel mill, we purchase cold and hot rolled finished and coated coils from steel mills, which we use to manufacture our cold-formed steel framing products in plants that are located in the United States.

Generally, ClarkDietrich can fulfill all **Build America, Buy America** orders. Occasionally, due to the vast number of gauges, and skews associated with a project, we may not have all the proper coils in stock at your desired manufacturing location. In this case, special order coils will need to be purchased, which could cause longer lead times and upcharges for those specific products.

NOTE: For ClarkDietrich to supply Build America, Buy America compliant steel, this will need to be communicated to us when requesting a quotation or placing an order so we can Red Flag your order and apply the proper coils to the order. For verification, Steel Mill Certificates can be supplied after the order has been produced.

Best Regards,
Adam Shoemaker
Corporate Sustainability Manager
ClarkDietrich