Comparison of Domestic-Content Laws*

This chart compares BABA with the other major domestic-content regimes. Only BABA applies to ARC financial assistance; the others are shown for context. A project subject to more than one law must be analyzed separately under each.

Feature	BABA (2 CFR 184)	Buy American Act (1933)	FTA Buy America	IRA Domestic Content
Legal basis	IIJA §§70901–70927; 2 CFR 184	41 U.S.C. 8301–8305	49 U.S.C. 5323(j); 49 CFR 661	IRC §§45, 48 (as amended by IRA)
Applies to	Federal financial assistance for infrastructure	Direct federal procurement	FTA-funded transit projects	Clean-energy tax credit projects
Categories	Iron/steel; manufactured products; construction materials	End products (and construction materials for contracts)	Steel, iron, manufactured products	Steel/iron; manufactured products
Iron/steel standard	All processes, melting through coating, in U.S.	Manufactured in U.S.	All manufacturing in U.S.	100% (steel/iron) for bonus
Manufactured-products test	Made in U.S. + >55% U.S. component cost	>60% U.S. component cost (2024+)	Made in U.S. + >60% component + final assembly	Adjusted percentage (rising over time)
Construction materials	Covered (all processes in U.S.)	Limited	Added via 2 CFR 184	Not applicable
Waivers	Public interest; nonavailability; unreasonable cost	Public interest; nonavailability; unreasonable cost; Trade Agreements Act	Public interest; nonavailability; cost	None (voluntary bonus credit)
Trade-agreement exception	No blanket exception	Yes (Trade Agreements Act)	No	No

* The content of this chart may be affected by changes to applicable laws, following the date of this manual.

For more Information, see the [Grantee BABA Manual] or the [RSBA BABA Manual].