



**Webinar Recap**  
**AIS & BABA Certification Letters:**  
**Key Requirements & Best Practices**  
**January 22, 2026**

On January 22, the U.S. EPA Domestic Preference team hosted the first webinar in its Lunch and Learn series, focusing on AIS/BABA Certification Letters under the Build America, Buy America (BABA) program. While the session was not recorded due to EPA guidelines, we provided a detailed overview of AIS and BABA requirements for EPA-funded water infrastructure projects, with a strong focus on manufacturer certification letters and common compliance issues. A summary of the key points is provided below for those who were unable to attend.

**Key Takeaways**

**1. Understanding AIS vs. BABA**

- **AIS** is a permanent requirement and applies to all State Revolving Fund (SRF) projects for public water systems and treatment works, as well as certain grants and WIFIA projects.
- **BABA** is a broader federal requirement that applies to federally funded infrastructure projects, including SRF equivalency projects, community grants, and WIFIA.
- Some projects may be subject to **both AIS and BABA**, creating overlap.

**2. Product Categories Under BABA**

- **Iron and Steel Products:** Generally more than 50% iron or steel; all manufacturing processes (from initial melt through coatings) must occur in the U.S.
- **Construction Materials:** Includes non-ferrous metals, plastics, glass, fiber optic cable, lumber, drywall, and engineered wood; all manufacturing processes must occur in the U.S.
- **Manufactured Products:** Products made from multiple components; final manufacturing must occur in the U.S., and at least **55% of the total component**.

**3. Manufacturer Certification Letters**

Certification letters are the primary method of documenting compliance.

**Required elements include:**

- Project identifier (name, number, or location)
- Clear product description (more than just “pipe” or “valve”)
- Explicit statement of compliance with **AIS and/or BABA** (not generic “Buy American” language)

- Identification of the applicable BABA product category (if relevant)
- Manufacturing location(s), including final manufacturing
- Signature of a qualified manufacturer representative (digital signatures are acceptable)

**Important reminders:**

- Certification letters must be **original, project-specific**, and issued by the **manufacturer** - not suppliers or distributors.
- Generic, blanket, provisional stating future compliance, or online fill-in form letters are not acceptable.
- Altered or reused certification letters are a serious compliance concern.
- [Click Here](#) for link to EPA's website to access certification template letters.

**4. Kits and Systems**

- Certain products may qualify as “kits” and be evaluated as a single manufactured product if purchased from one manufacturer and assembled onsite. Large or wide-ranging systems (e.g., full treatment systems) generally do not qualify.
- EPA water treatment systems such as sequencing batch reactors are **not considered kits**

**5. Roles and Responsibilities**

- **Manufacturers:** Provide accurate certification letters.
- **Contractors:** Verify compliance before installation.
- **Assistance recipients (owners):** Collect and retain certification documentation.
- **States and EPA:** Oversee and enforce compliance, including through audits and site visits.

**6. Waivers and Additional Resources**

- Compliance can be achieved either through certified compliant products or approved waivers.
- A future webinar will focus specifically on **waivers**, including de minimis and product availability waivers.
- EPA encourages participants to submit project-specific questions to the official BABA and AIS inboxes at [baba-ow@epa.gov](mailto:baba-ow@epa.gov) and/or [srf\\_ais@epa.gov](mailto:srf_ais@epa.gov)

U.S. EPA Domestic Preference team will host additional Lunch and Learns focused on Build America, Buy America (BABA) topics, including waivers, calculating the cost of components for manufactured products, and more. WWEMA will keep you updated on future webinar dates.