

MATERIALS & TESTS

Domestic Material Compliance

Domestic material requirements include longstanding Buy America requirements for iron & steel, and newer Build America, Buy America (BABA) requirements for construction materials and manufactured products on Federal-aid projects.

NCDOT has released the Domestic Material Compliance Guidance for NCDOT Construction Projects and revised Article 106-1 through special provision. The guidance provides the Department's framework for material classification, certification, documentation, and contract administration.

Iron & steel requirements apply to all NCDOT contracts. Construction material and manufactured product requirements apply to Federal-aid projects. Domestic material requirements apply only to materials permanently incorporated into the completed project.

Material Classifications

Domestic material requirements depend on how the material is classified as delivered to the project. The illustration below provides some common examples of materials and classifications.

When classification is unclear, coordinate through your ACE. The ACE will consult with M&T for a classification determination.

Single, homogeneous materials that are neither predominantly iron or steel nor composed of multiple assembled components.

All manufacturing processes must occur within the US.

Applies to Federal-aid projects.

CONSTRUCTION MATERIALS

EXAMPLES:
NON-FERROUS METALS
PLASTICS, POLYMERS,
GLASS,
LUMBER

Products in which iron or steel is the predominant material.

All manufacturing processes, including coating applications, must occur within the US.

Applies to all NCDOT contracts (Federal -and State- funded).

IRON & STEEL

EXAMPLES:
REBAR
STRUCTURAL SHAPES,
GIRDERS, PLATES
COUPLERS,
CASTINGS

MANUFACTURED PRODUCTS

EXAMPLES:
TRAFFIC SIGNAL CABINETS, LIGHT POLES W/ WIRING, CONCRETE UNITS, SIGN PANELS W/ SHEETING

Items created through the combination or assembly of multiple components, at least one of which has undergone substantial transformation from its raw material.

Compliance requires domestic final assembly and, beginning October 1, 2026, greater than 55 % of component cost must be sourced in the United States.

Applies to all Federal-aid projects.

EXCLUDED/ NOT SUBJECT

EXAMPLES
ASPHALT, AGGREGATES, & READY-MIX CONCRETE

These are materials not subject to domestic content requirements and consist of cement and cementitious materials, aggregates, and aggregate binding agents or additives. Some additional examples include: seed, straw, sod, fertilizer, and live plants.

Temporary materials used solely to facilitate construction and not serving a continuing role in the completed facility are not subject to domestic material requirements.

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Material Certification Forms

Manufacturers and suppliers may use the NCDOT Domestic Material Self-Certification Form, the AASHTO Domestic Material Certification Form, or an equivalent form of their own design, provided the submission contains sufficient information to allow the Contractor and Resident Engineer to verify:

1. The correct domestic material category,
2. Shipment-specific traceability, such as invoice number, bill of lading, lot number, heat number, or other identifying information,
3. A clear attestation of compliance with the applicable domestic-content requirements.

NCDOT APL - BABA Indicator

Some products on the NCDOT Approved Products List (APL) may display a BABA status. At the time of application to the APL, manufacturers can indicate if the submitted product Meets, Does Not Meet, or is Exempt from the BABA guidelines outlined in 2 CFR Part 184. An indicator of Unknown is shown when a manufacturer does not give indication of domestic material compliance.

This BABA Indicator is informational only and is not continuously verified by NCDOT. Do not rely on the APL to establish Domestic Material Compliance. Compliance must be verified independently through required shipment-specific manufacturer/supplier certification tied to the material delivered to the project.

<https://apps.ncdot.gov/vendor/approvedproducts/Default.aspx>

For guidance, refer to the NCDOT Domestic Material Compliance Guidance for NCDOT Construction Projects.

For contract administration and documentation procedures, see the Construction Unit Roadway Bulletin.

CONTACT US

DOMESTIC MATERIAL SUPPORT SERVICE ACCOUNT

BABA.Support@ncdot.gov



AASHTO Self-Certification Form:
<https://transportation.org/product-evaluation-and-audit-solutions/domestic-materials-self-certification-form/>



Domestic Material Compliance
Guidance for NCDOT Construction
Projects:
<https://connect.ncdot.gov/projects/construction/Documents/NCDOT%20Domestic%20Material%20Guidance.pdf>

NCDOT Construction Unit
Roadway Bulletin:
<https://connect.ncdot.gov/site/construction/Pages/Construction-Resources.aspx#/>