

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
AIR AND RADIATION

March 26, 2012

Dear Radiant Barrier Manufacturer or Interested Party:

In September of 2011, the U.S. Environmental Protection Agency (EPA) finalized new participation requirements for the 'Seal and Insulate with ENERGY STAR' Program for insulation products. During its development, several key issues were raised about radiant barrier products, which have resulted in the exclusion of these products from the new scope of the 'Seal and Insulate with ENERGY STAR' program. These issues include:

- Radiant barrier products, as defined by EPA in the "Seal and Insulate with ENERGY STAR Definitions and Testing Requirements Version 1.0," are not included as a home insulation product in the Federal Trade Commission (FTC) Code of Federal Regulation (CFR) Part 460 "Labeling and Advertising Home Insulation."
- By definition, radiant barrier products do not have an R-value since, for residential applications, they are typically installed in open air spaces like attics, which have significant convective air movement that is difficult to quantify.
- The terms "seal" and "insulate" are not appropriate when applied to radiant barrier products because they are neither sealed nor assigned an R-value.
- Currently, there is no explicit guidance on the effective use of radiant barriers in the International Energy Conservation Code (IECC).
- The cost effectiveness of radiant barrier products is highly variable across climate zones and across various installation scenarios. EPA has not yet developed a way to communicate clearly to consumers the situations in which the product has cost effective benefits within a national program framework.

Note: Reflective insulation products, which are installed in enclosed air spaces (and have very limited but definable air movement), will continue to be included in the program. EPA understands that products are sometimes marketed as both radiant barrier and reflective insulation, as defined in the "Seal and Insulate with ENERGY STAR Definitions and Testing Requirements Version 1.0." In this case, the manufacturer may reapply to participate in the program as a reflective insulation manufacturer and will be required to limit association of the ENERGY STAR (ES) graphics to only the reflective insulation applications.

Although EPA was not able to include radiant barrier products at this time, EPA will continue to work with stakeholders to develop educational and promotional messaging that makes sense for the program.

**Due to these unresolved issues, as of May 23, 2012, EPA requires that manufacturers end the labeling of radiant barrier products. All manufacturers labeling radiant barrier products must take the following actions:**

- Stop printing any ENERGY STAR logo or graphic on any newly manufactured radiant barrier products or newly printed marketing materials. Manufacturers may continue to use up existing products and materials with the label. Labeled products manufactured before May 23, 2012 do not have to be disposed of. If a manufacturer has a large stockpile or warehouse of products that will not be sold or used by May 23, 2012, EPA suggests stopping the labeling of products immediately.
- Remove references to ENERGY STAR or ENERGY STAR radiant barrier products from all websites.
- Stop using the ENERGY STAR partner mark in reference to the company in marketing materials or on the web. (Manufacturers who make other ENERGY STAR insulation products may continue to use the ENERGY STAR partner logo after May 23, 2012 only once they have met the new participation requirements.)

NOTE: All insulation manufacturers who were previously partnered with the program are currently designated as "inactive" partners as of September 23, 2011, and therefore, are no longer listed in the public database of active partners.

You can find past Webinars explaining the overall changes to the program [here](#), as well as the Seal and Insulate with ENERGY STAR Launch Memo and Definitions and Testing Requirements Version 1.0 released on September 26, 2011.

**Radiant Barriers and the ENERGY STAR New Homes Program:**

Radiant barriers are referenced in the ENERGY STAR Qualified Homes Version 3 (Rev 5) National Program Requirements. Radiant barriers are listed in the document as an option to meet an ENERGY STAR program requirement to help cool attics containing air ducts in IECC climate zones 1, 2, or 3.

Radiant barrier manufacturers may promote this fact and use the words “ENERGY STAR®” in text referencing the ENERGY STAR Qualified Homes program as long as the text clearly references what section of the Qualified Homes requirements they are referring to, such as:

*"The <Radiant barrier product> made by <manufacturer name> is designed to meet the Prescriptive Path requirement for homes in IECC Climate Zones 1-3 that have more than 10 linear feet of ductwork located in an unconditioned attic. See Exhibit 1 of the ENERGY STAR Qualified Homes, Version 3 (Rev 05) National Program Requirements at [www.energystar.gov/newhomesguidelines](http://www.energystar.gov/newhomesguidelines)."*

**Since radiant barriers are no longer an ENERGY STAR product, manufacturers may not use any ENERGY STAR logos, marks, or graphics to promote such products.**

Please send any questions or requests for assistance to [insulation@energystar.gov](mailto:insulation@energystar.gov).

Thank you for your continued support of the ENERGY STAR program.

Sincerely,

Doug Anderson  
EPA Project Manager  
Seal and Insulate with ENERGY STAR