Topic	Comment Summary	EPA Response
Codes and Standards	Sunsetting the program will not result in backsliding and is supported. Widespread adoption of cool roofs through practice, codes, regulations; availability of ANSI/CRRC S100 standard for radiative properties of roofing materials and CRRC product directory ensure the market will not backslide without ENERGY STAR. In numerous cases, the listed standards have leap frogged over the current ENERGY STAR criteria.	EPA agrees with this point, noting that ASHRAE, IECC, Green Globes, and USGBC's LEED program all have standards for roofs, many of which exceed the stringency of the current ENERGY STAR requirements.
Complicated Decision Making	Recognizing that no product is ideally suited for every building or climate, some stakeholders supported sunsetting. They noted that building designers need to weigh many things: color, durability, application choice, insulation, vapor barriers. A binary label doesn't support this complicated design-making. It may do damage to building science. Additionally, a stakeholder commented that the focus on cool roofs is actually confusing the market. - Citing DOE, they noted that white roofs are more efficient than black only at Atlanta and south. - They added that Insulation at R-25 or greater makes roof color irrelevant. - Lastly, some commenters have experienced condensation where white roofs are installed in cold climates vs dark roofs.	EPA agrees that many factors must be considered when making choices about efficiency in the top of a home. For residential roof products, EPA concluded that current binary label approach falls short of guiding consumers to the most cost-effective choice specific to improving the efficiency of their home envelope. Because reflective roofing is not the best choice for efficiency in many climates and homes, education that helps consumers select the best approach for driving efficiency in the top of their homes is more appropriate than a binary nationwide label.
Costs of 3PC	The ENERGY STAR third-party certification requirement has driven up cost of participation, questioning value.	EPA appreciates this comment and recognizes the importance of brand owners getting value out of their ENERGY STAR partnership. EPA considers carefully all requirements associated with the partnership EPA shares with brand owners.
Costs of Efficiency Options	One commenter stated that upgrading attic floor and ductwork insulation to see comparable savings would be 2 to 4.5 times more expensive than a cool roof. See the Oak Ridge calculator.	The Oak Ridge calculator estimates energy savings of a cool roof over a conventional black roof without factoring in the cost of the product. EPA found that the cost adder for the preferred darker residential roofing materials is approximately $.55 per square foot. One stakeholder noted that the pay back period on an ENERGY STAR roof is typically 30 years.
Simplicity of ENERGY STAR	Another stakeholder noted that building codes are too complex for residential consumers, while ENERGY STAR is easier to understand.	Only California has codes for residential roofs. Absent codes, the cost premium of ENERGY STAR roofs has resulted in a low adoption rate outside of California according to leading partners. Education that helps consumers select the best approach for driving efficiency in the top of their homes is more appropriate.
Standard Development	A stakeholder cautioned that EPA is ceding standard development to the private sector with the sunset of the ENERGY STAR program.	The private sector already plays a significant role in developing standards that are respected and referenced in the market. ASHRAE, IECC, Green Globes, and USGBC's LEED program all have standards for roofs, many of which exceed the stringency of the current ENERGY STAR requirements.
Value of ENERGY STAR	Some commenters stated that the ENERGY STAR label provides a clear, trusted, verified indication of energy efficient roof products and should be maintained.	ENERGY STAR brought value to the market for two decades, but standards and codes have replaced it in the commercial space and as a "binary" label, it may be confusing the residential market. Roof energy efficiency is multi-faceted (varies by region, building type/use/age, etc.).
Incentives	Some stakeholders noted that with a sunset incentive programs for ENERGY STAR would disappear.	Incentive programs like Austin Energy already reference specific solar reflectance values. Most reference ASHRAE or IECC. Only a small set of incentives require ENERGY STAR today including select organizations in Florida, Georgia, and Texas.
ENERGY STAR Enforcement	One commenter stated that ENERGY STAR third-party certification supports enforcement of codes and should not be sunset.	ENERGY STAR third-party certification is not designed to replace enforcement of code, and may not be an efficient or effective way to ensure codes are met. Limits on EPA's ability to help consumers recoup losses in the case of failures make relief under state and other laws more effective than federal trademark law.
Regional Focus	A stakeholders suggested that EPA consider refocusing the program on southern climates.	While a focus on the south would address some of the concerns with a binary label, it does not resolve them all, as consumers and building owner and operators must still weigh all factors when determining the best approach for the roof and insulation.
Timeline	Numerous stakeholders stated that the investment made in ENERGY STAR can not be recouped in 3 years and more time should be given for the transition.	The program has revised the timeline and suggests a sunset 4 years from the proposal. It is worth noting that a trade association relayed that manufacturers can easily remove the ENERGY STAR label from products and literature within a year.
US Jobs	A commenter stated that without ENERGY STAR, foreign competition will result in the loss of US sales/jobs.	Other standards, codes, and practice will prevent the market from falling to low cost imports.