

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



OFFICE OF  
AIR AND RADIATION

June 5, 2018

Dear ENERGY STAR Roof Brand Owners and Other Interested Parties:

The purpose of this letter is to present a proposal from the U.S. Environmental Protection Agency (EPA) to sunset the [ENERGY STAR specification for roof products](#). The ENERGY STAR label and specification played a critical role at the time of its launch in 1999, jumpstarting demand for cool roofs; however, a recent review performed by EPA indicates that it has been surpassed, in many instances, by commercial building codes and that the range of considerations relevant to the residential purchase decision mean homeowners would be better served by a different kind of resource. The Agency is sensitive to the investment roofing brand owners have made in order to earn the ENERGY STAR and is proposing a 3-year phase -out period. This letter elaborates on EPA's rationale for sunseting ENERGY STAR for roof products, addresses our plans for enhanced consumer education and outlines a proposed timeline. EPA requests feedback on this proposal no later than July 9, 2018.

**ENERGY STAR Roof Products Background**

The ENERGY STAR roof product specification was introduced in 1999 with the intention of creating a market for cool roofs. It was spurred by the recognition that Americans were spending about \$40 billion annually to air condition buildings - one sixth of all electricity generated in this country. EPA developed a specification to reward roofing products with higher reflectivity, thereby lowering roof surface temperature by up to 50 degrees, reducing the amount of heat transferred into a building and reducing the amount of cooling needed. In the last decade, building codes have followed, setting standards primarily for commercial buildings.

**Criteria for Sunsetting**

Under certain circumstances, EPA makes the determination that an ENERGY STAR specification for a particular product category should be sunset rather than revised. Some or all of the following factors play into such a decision:

- Additional, cost-effective efficiency gains are not available or anticipated
- A standard exists or is forthcoming at the current ENERGY STAR level that will serve as a backstop so efficiency gains are maintained
- The market has evolved such that the product type is being discontinued

For this product category, EPA has determined that two of these factors exist. For commercial roof products, state building codes and industry practice are widely in use and serve as a

backstop for efficiency. For residential roof products, EPA has 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. Rather, tailored regional guidance would better serve the consumer

### **Rationale for Proposed Sunset**

**Commercial Roofs:** Efficient commercial roofing, initially driven by ENERGY STAR, is now driven by codes and voluntary building standards, as well as standard design practices nationally. Commercial buildings codes in all but five US states include requirements for roofs. Further, highly reflective commercial roofs are now part of the mind-set for designers, contractors and building owners in climate zones across the majority of the south. Many states and municipalities have adopted IECC 2010, 2012, or 2015 or ASHRAE 90.1-2007, 90.1-2010, or 90.1-2013 as their building codes, meaning their standards for roof products on commercial buildings are stricter than the ENERGY STAR Roof Products Version 3 specification in climate zones where reflective roofs are beneficial (Zones 1-3).

**Residential Roofs:** Discussion with stakeholders including brand owner partners, distributors/retailers, certification bodies, and energy efficiency program sponsors revealed that reflective roofing is not the best choice for efficiency for many climates and homes. While reflectivity is helpful in hot climates, it is counter-productive in cold climates. EPA also found that the cost premium is high for preferred darker residential roof materials, approximately \$0.55 per square foot. Attic air sealing, increasing attic insulation levels, and insulating ducts are very often more cost effective than an ENERGY STAR residential roof and deliver benefit in both heating and cooling climates. In the face of all this complexity, there has been low adoption of ENERGY STAR residential roofs in all areas except California, where cool roofing is mandated by Title 24.

### **Consumer Guidance**

In addition to offering a label on products, the ENERGY STAR program is recognized more broadly as a trusted resource on energy-efficiency. More than 600,000 users visit the ENERGY STAR website each month, leveraging our tools and advice. In conjunction with this phase-out, EPA will develop tailored regional recommendations for homeowners, to guide them through their options for saving energy and the considerations associated with reflective roof products.

### **Proposed Milestones for Sunsetting the ENERGY STAR for Roofs Products**

EPA proposes the following milestones associated with implementing this proposal:

- Existing certifications of ENERGY STAR roof products will remain valid until June 1, 2021.
- Certification Bodies will be instructed to stop certifying new product submittals as of June 1, 2020.
- No new promotional materials for roof products (printed and electronic) that use the ENERGY STAR mark may be produced after June 1, 2020. Brand owners are permitted to use up existing printed material, including packaging, to minimize waste.
- Brand owners must stop using the ENERGY STAR name and ENERGY STAR mark in association with all roof products manufactured on or after June 1, 2021.

- To minimize the cost of labeling changes and be in compliance by June 1, 2021, brand owners of roof products are encouraged to remove ENERGY STAR references on Web sites or in other collateral materials as these materials are reprinted or changed.

Stakeholders are invited to comment on this proposal to sunset the ENERGY STAR for roof products. Any feedback or data you wish to share with EPA may be submitted via email to [roofproducts@energystar.gov](mailto:roofproducts@energystar.gov), no later than July 9, 2018. All comments will be posted to [https://www.energystar.gov/products/spec/roof\\_products\\_specification\\_version\\_3\\_0\\_pd](https://www.energystar.gov/products/spec/roof_products_specification_version_3_0_pd) unless a stakeholder requests otherwise.

In closing, EPA appreciates the efforts of roof product partners to advance a cleaner environment through the ENERGY STAR Program and applauds your success in moving the market towards greater energy efficiency. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Bailey". The signature is stylized and cursive.

Ann Bailey, Chief  
ENERGY STAR Labeling Branch  
US Environmental Protection Agency