



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

OFFICE OF AIR AND RADIATION

August 22, 2014

Dear ENERGY STAR[®] for Windows, Doors, and Skylights Manufacturers and Other Interested Parties:

The U.S. Environmental Protection Agency (EPA) is pleased to share the final version of Labeling Guidance for ENERGY STAR Windows, Doors, and Skylights for Version 6.0. The Labeling Guidance describes the proper use of the ENERGY STAR label on products, product displays, and product packaging. All uses of the ENERGY STAR label will need to comply with the final version of this guidance beginning on January 1, 2015.

ENERGY STAR partners may download the final Labeling Guidance and label templates for Version 6.0 products through the My ENERGY STAR Account (MESA) portal, at www.energystar.gov/mesa. EPA will also provide a link to the updated guidelines until January 2015 at:

http://www.energystar.gov/ia/new_homes/downloads/ES_LabelingGuidance_Windows_Doors_Skylights_V6.pdf. After this time, the document will continue to be available to partners through the MESA portal.

EPA thanks all of the stakeholders who provided feedback on the draft guidance. Below, EPA lists the specific changes that were made from the draft version, provides reasoning for why the Agency did not make certain changes, and answers additional questions raised by stakeholders in their comments.

Summary of changes from the draft version:

- 1) EPA clarified (on page 1) that the allowance to continue using the Version 5.0 product specification for Northern Zone products until January 1, 2016 applied to only *window* products.
- 2) EPA added language on the proper use of spine labels.
- 3) EPA added language to allow for the use of diagonal lines, crosshatching, dots, or similar designs to indicate the climate zone(s) in which a product meets the requirements.
- 4) EPA clarified that ENERGY STAR labels not directly attached to the National Fenestration Rating Council (NFRC) temporary label should be immediately adjacent (1 inch or less) to the NFRC label, unless a unique product configuration limits that requirement.

- 5) EPA adjusted the spine label language so that it no longer specifically mentions windows and can be used for other product types.
- 6) EPA changed the spine label width requirement for the “Qualifies in all 50 States” non-map option to have a 3 inch minimum width, the same requirement as the map option.

Responses to requests not implemented:

- 1) One stakeholder requested that EPA amend the table used to designate Version 6.0 criteria for windows to include separate columns for 2015 and 2016 under the heading “ENERGY STAR Version 6.0.” The stakeholder explained that this change would “reduce the likelihood of confusion to homeowners and legislative and financial incentive providers,” and eliminate “the need to use two separate tables to determine product compliance.”

Response: The EPA wishes to clarify that windows that meet the Version 5.0 Northern Zone criteria may continue to carry the ENERGY STAR label in 2015; however, EPA does not consider these products to meet the Version 6.0 criteria. The required implementation date of the Version 6.0 Northern Zone criteria was delayed until January 1, 2016, but manufacturer partners may begin selling products that meet the Version 6.0 Northern Zone criteria as soon as they wish. The criteria table included in the Labeling Guidance document seeks to make this distinction clear.

In addition, the Labeling Guidance document is intended only for use by manufacturer partners to determine how to label ENERGY STAR certified products. Therefore, this document should not be the primary basis for consumer-facing information, nor should any of the criteria tables in the document be reproduced for marketing purposes. EPA will consider this feedback when developing new criteria tables for the ENERGY STAR website and other consumer-facing materials to make clear that the effective ENERGY STAR requirements for 2015 reference the Version 5.0 Northern Zone criteria. EPA plans to release the new criteria tables prior to January 1, 2015.

- 2) One stakeholder requested that EPA return to using the terminology “ENERGY STAR Qualified” that it has historically used instead of referring to “certified” products.

Response: The performance ratings of all ENERGY STAR windows, doors, and skylights are independently certified by the NFRC. The EPA has been moving towards the use of the term ‘certified products’ across the ENERGY STAR program.

- 3) One stakeholder asked whether the EPA could delay of enforcement of labels for 180 days to allow more time for implementation.

Response: When finalized, partners will have at least 120 days to implement new labeling guidance (before January 1, 2015) and are only required to place the labels on new manufactured products immediately on and after that date. The EPA understands that even after the implementation date, some products may remain on retailer shelves or in warehouses with the old labeling. The EPA will be flexible as partners implement the new guidance in a timely fashion.

- 4) One stakeholder requested that the EPA reduce the minimum size requirement for ENERGY STAR product labels to allow for labels below 3.75 inches wide.

Response: The current minimum width of 3.75 inches matches the required minimum width of the NFRC temporary label. This requirement has been part of the ENERGY STAR labeling guidance since January, 2010. The EPA will continue to require this minimum width to help maintain a legible label map size for consumers and to make it easier for the EPA and laboratories performing certification and verification actions to visually check this requirement.

- 5) One stakeholder asked whether the EPA would consider allowing the compact map label (3A) for all product types.

Response: The EPA believes that the compact map label (3A) does not have adequate resolution for consumers to easily compare multiple zones across the country. The use of the compact map label was allowed for a very specific, unique, and limited situation: namely, greater than half-light doors that only meet the requirements for the Northern and North-Central Climate Zones. In this case, only one very small map was allowed since no other zone combination needs to be considered for this product configuration. Only the compact “ENERGY STAR Certified in all 50 States” label is needed as an alternative, and that label does not contain a map.

Responses to questions raised during feedback:

- 1) Several stakeholders were concerned whether the EPA would strictly and immediately require that partners use labels that refer to ‘certified’ products.

Response: EPA understands that it takes time for manufacturers to make adjustments in product labeling and will allow partners to make the required change over the course of normal business operations. The EPA is not requiring manufacturers to immediately make the change and does not plan to take any actions to enforce this phrasing change at this time. However, note that the EPA will only make available labels with the ‘certified product’ phrasing going forward.

- 2) One stakeholder asked whether a spine label could be placed on a product face if the spine label could not be printed with an adequate resolution using an economical application method.

Response: The new labeling guidance allows manufacturers to place the spine label on a different face (or multiple faces), depending upon how the product is sold. The manufacturer may wish to discuss the spine label face preference with any retailers it sells to.

- 3) One stakeholder asked whether the use of a North American map required a custom label review by EPA or whether a North American map could be used with a spine label.

Response: The EPA does not require a custom label review when a North American

map is used in place of a map of the United States on product labels or spine labels. However, all other minimum size and formatting guidelines are still required.

- 4) One stakeholder asked why it was necessary to inform the ENERGY STAR program if certain product options in a product line a manufacturer has identified for verification testing are routinely not being labeled as ENERGY STAR.

Response: Manufacturers select product lines for verification testing, but can manufacture certain options within those product lines that they do not market as ENERGY STAR. It is important to inform ENERGY STAR if those options exist so that they are not selected for verification testing. EPA has also been made aware of unique situations, such as where customers specifically order non-labeled products for certain situations (i.e., manufactured housing). Non-labeled products are not considered ENERGY STAR certified and should not be marketed as such.

- 5) One stakeholder asked if the EPA will recognize the challenges of putting the NFRC temporary label and the ENERGY STAR label on Tubular Daylighting Devices (TDDs).

Response: Partners should strive to follow the NFRC labeling guidelines for TDDs as closely as possible and the EPA will consider the challenges these products present when checking for compliance with the ENERGY STAR labeling guidance.

- 6) One stakeholder asked why the labeling guidance references structures of “three stories or less” in the labeling guidance?

Response: The reference is simply a reminder that ENERGY STAR windows, doors, and skylights program is designed for residential products. Building height helps define what a residential structure is in the International Residential Conservation Code (IECC). The reference is also used in the ENERGY STAR Product Specification definition of a Residential Building.

- 7) One stakeholder asked if a display label was required on a display unit that still had a temporary NFRC label on it.

Response: If a display product still has an accurate NFRC temporary label on it with the correct ENERGY STAR labeling, it does not also need an ENERGY STAR display label.

- 8) One stakeholder asked if a display label was required for a display unit in which all variants qualified in all U.S. Zones.

Response: If all variants of a display product meet the ENERGY STAR criteria in all zones and the vendor wishes to indicate that the product is ENERGY STAR certified, an ENERGY STAR display label must be used.

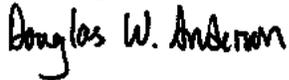
- 9) One stakeholder requested that EPA hold an in-person meeting for the Fall Stakeholders Meeting, rather than only holding a conference call.

Response: EPA recognizes the value of meeting with stakeholders in-person to discuss

the process for the next specification revision. EPA is planning on holding an in-person meeting, and an online conference call option will also be available to those stakeholders who cannot attend in-person. EPA will be releasing further details on the date and location of the meeting as soon as they are available.

Again, the EPA thanks our stakeholders for providing feedback on the ENERGY STAR Version 6.0 product labels and labeling guidance. We look forward to working with our stakeholders to implement the new Version 6.0 specification for windows, doors, and skylights over the coming months.

Sincerely,

A handwritten signature in black ink that reads "Douglas W. Anderson". The signature is written in a cursive style with a prominent initial "D".

Douglas W. Anderson
Manager, ENERGY STAR for Windows, Doors, and Skylights Program
U.S. Environmental Protection Agency