



145 LIMEKILN ROAD, NEW CUMBERLAND, PA 17070
PHONE 717-932-8500 FAX 717-932-8501

July 9, 2018

Ms. Ann Bailey
Chief, ENERGY STAR® Labeling Branch
US Environmental Protection Agency
Sent Via Email: roofproducts@energystar.gov

Re: Stakeholder Feedback – EPA Proposal to Sunset ENERGY STAR® Roof Program

Dear Ms. Bailey,

Keystone Certifications is an EPA-recognized Certification Body responsible for thousands of ENERGY STAR® Roof Product certifications. We work with over 70 ENERGY STAR® Roof Program Partners in the qualification and maintenance of thousands of products and the use of these ENERGY STAR® certifications in the marketplace. Keystone is pleased to provide feedback to the EPA's proposed sunset of the ENERGY STAR® specification for Roof Products (the "Roof Program") as outlined in the June 5th, 2018 letter (the "Proposal").

During this comment period, we have engaged in discussions with numerous roof product manufacturers, testing laboratories, fellow certification bodies and industry associations. We have heard nearly unanimous support for the Roof Program and opposition to its proposed sunset. While we have attempted to keep our response brief, we believe it reflects the view of the majority of the stakeholders in the industry.

Rationale

The sunset proposal makes two primary arguments for sunseting the Program. First, it contends that commercial code (IBC/IECC) "standards for roof products on commercial buildings are stricter than the ENERGY STAR® Roof Products Version 3 specification." This may be true in some circumstances, but the stricter requirement only applies to low slope roofs (<2:12) in Climate Zones 1, 2 & 3. A significant portion of new roofs exceed that slope, and without the Program, it is difficult for specifiers to make an informed decision. According to a study by the National Roofing Contractors Association, steep-slope roofs accounted for roughly 28% of all new roofs installed in 2014 and 2015¹. The commercial codes do not in any way address energy efficiency for this large segment of the market.

Even for low-slope roofs, alternative compliance paths are available without the stricter roof reflectivity requirements. These methods and building codes do not include third-party certification, which minimizes false performance claims and helps level the playing field.

In addition, the commercial code is not clear on how compliance with the stricter requirement is demonstrated and (in our experience) this results in practically *zero code enforcement*. This is a significant and widespread concern. Relying on building codes alone is insufficient; if our goal is to promote energy efficiency, decision-makers can't be focused on just meeting code requirements. There must be an easily understood, nationally recognized means of conveying quality and compliance. We believe the ENERGY STAR® is the only viable means available today.

¹ <http://www.nrca.net/0715-Market-Survey>



The second argument for sunsetting the program is the limited value of reflective roofing for residential roofs in higher latitudes. We request that the EPA make available the data that led to the conclusion that “reflectivity is helpful in hot climates, [but] it is counter-productive in cold climates.” Many industry participants that we have engaged with have questioned the validity of that claim. Even if true, this would not lead to the elimination of the Roof Program, but rather it represents an opportunity to improve the program by specifying regions where the energy savings are substantial. Over 60% of energy usage in residential settings is consumed in states with warmer climates². Clearly, there is an opportunity to improve the program by specifying regions where the energy savings are substantial.

The Proposal states that “EPA also found that the cost premium is high for preferred darker residential roof materials, approximately \$0.55 per square foot.” This modest increase in the cost of a residential roof (approximately 10% on average) is an excellent example of why the Roof Program is so vital. Without a clear means to distinguish between products, most specifiers will choose the option with a lower upfront cost. This is often the case even when the more energy efficient option has a better return on investment over the life of the roof. Without the branding that a program like the ENERGY STAR provides, even fewer will take into consideration the non-economic benefits of energy efficiency. *Without the Program, there exists no simple means to differentiate an energy efficient product from less efficient alternative.* This effectively eliminates any basis for roof product energy incentive programs, leaving most roof product decisions to be based on other criteria like cost, aesthetics and inertia.

Finally, the Proposal points to attic air sealing and increased insulation as potential alternatives to the Roof Program, but, as is evident in use of the Oak Ridge National Lab’s Cool Roof Calculator tool that is linked on the ENERGY STAR® product finder tool, (<https://web.ornl.gov/sci/buildings/tools/cool-roof/>), even roof products with the lowest solar reflectance allowed by product specification (0.25) would yield a net cost savings yearly and over the life of the roof. Again, we request that the EPA make available the data that led to this proposal to sunset the spec.

Timing

As stated, we strongly oppose the sunsetting of the Roof Program. If the EPA were to proceed with the proposed sunsetting, we would have serious concerns with the proposed timing. The Roof Program has just converted to the new version 3.0 of the specification. In order to qualify for this new specification, products required redesign, testing and certification. Manufacturers have made substantial investments in time and money to achieve this.

The entire process for manufacturers to complete the required testing includes, initial testing, exposure on weathering farms for 36 months, and subsequent retesting of those exposed samples. That process takes on average 4 years, in total. Manufacturers have then invested in marketing their products as ENERGY STAR compliant. A three-year sunset period is barely long enough for many manufacturers to work through their supply of marketing materials, which would require they begin removing references to the ENERGY STAR in the very near term. Manufacturers need years to recoup the investment that they have made.

Summary

In summary, we and the stakeholders whom we have contacted, support the ENERGY STAR® Roof Program. While there may be opportunities to improve some aspects of the program, it would be a

² States with significant territory categorized as climate zone 1-4 according to the IECC (<http://reca-codes.org/about-iecc.php>). Energy usage data from EIA in 2016 (<https://www.eia.gov/state/seds/seds-data-complete.php>).

significant loss to the industry and energy efficiency efforts to sunset the Roof Program. We ask the EPA to revoke the Proposal and engage with stakeholders to revise the program to everyone's satisfaction. We look forward to working with you to that end.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Jonathan Hill". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jonathan Hill
President
Keystone Certification, Inc.