



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

OFFICE OF AIR AND RADIATION

Climate Protection Partnerships Division  
U.S. EPA 6202J  
Washington, DC 20460

April 6, 2015

Dear Reflective Insulation Manufacturer or Interested Party:

In September 2011, the U.S. Environmental Protection Agency (EPA) finalized new participation requirements for the ‘Seal and Insulate with ENERGY STAR®’ Program for insulation products. Since the implementation of these requirements, several key issues have emerged regarding reflective insulation products that have prompted the EPA to reconsider the applicability of these products within the scope of ‘Seal and Insulate with ENERGY STAR.’

These issues include:

- To date, no reflective insulation manufacturer has met the certification requirements for the ‘Seal and Insulate with ENERGY STAR’ program for any of their products.
- Manufacturers have had a difficult time showing how reflective insulation products can meet building codes as a stand-alone product or integrated into a whole wall, ceiling, roof deck, or floor system insulation strategy.
- Manufacturers claim their products can be used in applications which EPA does not certify. Those uncertified applications may lead consumers to be misled into thinking the products were certified though the EPA recognized certification body for those non-certified applications.

As a result of these concerns, the EPA is considering the removal of reflective insulation from the ‘Seal and Insulate with ENERGY STAR’ Program and adding it to the list of Excluded Products. The definition of reflective insulation and the list of Excluded Products used by EPA for this program can be found in the “[Seal and Insulate with ENERGY STAR Definitions and Testing Requirements.](#)”

The EPA invites stakeholders to provide feedback on the issues it described above and whether it should proceed in excluding this product category.

Please submit your comments, supporting information, and relevant data to EPA via email at [insulation@energystar.gov](mailto:insulation@energystar.gov). All comments must be received by EPA no later than April 24, 2015.

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

Sincerely,

Doug Anderson  
Manager, Seal and Insulate with ENERGY STAR Program  
U.S. Environmental Protection Agency