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July 2, 2018

Ann Bailey, Chief  
ENERGY STAR Labeling Branch  
US Environmental Protection Agency  
Washington, DC 20460

Dear Ms. Bailey:

This letter serves as an official response to your proposal dated June 5, 2018 presenting a plan to sunset roofing products from the ENERGY STAR program.

We at Polyglass U.S.A. believe this is a mistake. As a leading US manufacturer of highly-reflective modified bitumen roof membranes and roof coatings, Polyglass U.S.A., Inc. realizes substantial value in our products carrying the ENERGY STAR specification. And we strongly believe much of our US competition has a comparable position. The US EPA ENERGY STAR symbol is a UNITED STATES recognized consumer and industrial goods mark which designates UNITED STATES credentialed quality to building owners, distributors, purchasers, and end-users in this country and across the world via export business.

The US EPA's ENERGY STAR mark positions our products – as well as our similar US competitors' products – counter to companies (primarily from foreign concerns) which do not carry such US EPA ENERGY STAR mark. It's impossible to calculate or forecast how many US manufacturing jobs will be lost due to the absence of this US EPA ENERGY STAR credential, but there will be a significant ultimate impact with regards to US roofing manufacturers' loss of both sales and competitive advantage to foreign competition.

With the strong understanding that this administration cares deeply about protecting US manufacturers and US manufacturing jobs, I ask that you reconsider this sunset proposal. Should you like to speak further on this matter, please feel free to contact me accordingly.

Best regards,

John

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