

July 9, 2018

US Environmental Protection Agency

Sent by e-mail to: roofproducts@energystar.gov

Attention: A. Bailey, Chief
ENERGY STAR Labeling Branch

Re: Sunsetting of ENERGY STAR for roof products program

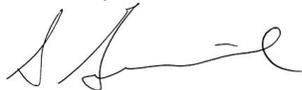
Dear Ms. Bailey,

We are writing to you with regards to your letter of June 5, 2018, regarding the sunsetting of the ENERGY STAR for roof products program.

Our company has actively participated in, and supported, this program since its inception and we continue to do so today. The widespread adoption of cool roofing concepts alluded to in your letter provides clear evidence as to how effective this program has been. One element of your letter however “undersells” what the program has achieved. The letter implies cool roofs are only used and effective in southern locations. Lawrence Berkeley National Laboratories, Princeton University, McGill University, Target Corporation and other major building owners, to name but a few entities, have demonstrated that cool roofs result in overall net energy savings in all but the most extreme northern locations such as Alaska. Cities as far North as Chicago have implemented cool roofing provisions in their energy codes and regulations.

We do appreciate that with the widespread adoption of cool roofs through practice, codes, regulations and the establishment of the ANSI/ CRRC S100 standard for radiative properties of roofing materials, and the availability of the Cool Roof Ratings Council’s Rated Product Directory, a case can be made for terminating the program. We would suggest however that as you proceed with this plan, you do not do a dis-service to all stakeholders by implying cool roof energy benefits are limited to a fraction of the country.

Best regards
Sika Corporation - Roofing



S.P. Graveline
Senior Vice President Technical Services

SIKA CORPORATION • ROOFING

100 Dan Road • Canton, MA 02021

Tel: 781-828-5400 • Fax: 781-828-5365 • usa.sarnafil.sika.com