



Institute for Environmental Research and Education

Date: 10 November 2015
From: Rita Schenck, Executive Director, IERE
Re: Response to R. Garries Letter received via email 16 October 2015
and dated October 2 2105.

Mr. Garries states that he had made public comments, which were not responded to by IERE per the requirements of the Earthsure General Program Instructions.

Mr. Garries letter states itself as an appeal, but it is composed of suggestions for editorial corrections and questions of interpretation for different sections of the Windows PCR and the Earthsure General Program Instructions.

IERE received no formal comments using the form required for such comments at any time and no comments at all from Mr. Garries during the open comment period. Informal queries (including those reiterated here) were received after the comment period ended and have been responded to elsewhere as a courtesy to Mr. Garries.

IERE finds that since no formal comments were received from Mr. Garries, his appeal, as expressed in the email received on 16 October 2015 has no standing.

In the interests of clarification to interested parties, some of whom might have the same issues, each item is addressed here. We are grateful to Mr. Garries for bringing these up to make minor corrections on the PCR and to clarify issues for interested parties. They are listed below in the order in which they were presented. IERE's responses are in italics.

1. Section 2.2 asks for NFPA sizes which references the National Fire Protection Association. This should reference NFRC for the correct sizes is that correct?
Response: This typo has been corrected.
2. Section 2.3 notes that site built commercial windows are the only category of products that do not need certification to be included in the PCR. This is interpreted to mean any factory glazed products must be certified to comply even if they are commercial. Is this correct?
Response: this is correct. There are no certification systems available at this time for site-built windows, often called ribbon windows. Thus they are not required.
3. Section 2.3.1 notes that Residential windows must be certified to NAFS, and NFRC 100/200. Section 2.3.2 notes that if you choose to call your residential window a ribbon window, no thermal certification is required. Is this correct?
Response: Mirriam Webster defines ribbon windows as "a series of windows set side by side to form a continuous band horizontally across a façade." While some residential windows are ribbon windows, these are a rare case and would be built on-site. As noted above, there are currently no certification systems for such windows and therefore no certification is required.
4. Section 2.3.2 also notes that either NAFS test reports OR thermal reports,Etc [sic] are required. Is this OR in the correct placement?
Response: yes

5. Section 3.4 notes that all packaging is to be included, but the boundary stops at window assembly. If a window is packaged after assembly, must the packaging be included in the boundary?

Response: Yes. The purchase of the packaging occurs in the manufacturing life cycle phase. The disposal, however would belong to the construction phase, where the packaging is disposed.

6. Section 3.8.1 notes that " Where the unit process is powered by methane from solid waste or waste water, wind, biomass, hydro or solar power and no energy leaves the facility (i.e. the system is not linked to a grid), renewable electricity produced from wind or solar may be accounted for within the system boundary. Does this mean that hydro power cannot be accounted for in the boundary?

Response: No. it is rare that hydro power is generated onsite, but not impossible. We have added hydro power to the description.

7. Section 5 notes that installation materials must be included in the modeling. I believe this is in error since the modeling should stop at the gate of product assembly. Is this correct?

Response: this section has been deleted.

8. Section 10.1.1 notes that hazardous chemicals as defined in Europe shall be used as the Candidate List Substances of Very High Concern. This list contains 175 chemicals, many of which are not on the US EPA list. Does this mean the US EPA list does not apply for this PCR?

Response: Only the EU Candidate List of Substances of Very High Concern are required by the PCR. Companies are free to add additional information not available on this list.

9. Section 10.1.1 reference note for chemicals (xv) refers to NAFS. Is this correct?

Response: thank you for noting this: the reference has been corrected.

10. Section 10.2.4 notes that alternative end of life scenarios are optionally reportable. Since there seems to be no criteria or reference standard for this scenario is any theoretical end of life permissible? (such as 99.9% recyclability of all primary materials thus reducing their impact to .1% of the virgin material impact?)The PCR should be explicit in its requirements, is it possible to add limiters, such as "only industry accepted end of life calculations are permissible"?

Response: this voluntary reporting permits alternative reporting methods, clearly separated from the mandatory reporting, and allows flexibility in the calculation while requiring transparency for all assumptions.

11. Appendix A notes that the eco label description and the unit description is for 30 years. Is this 30 year time period in error since the gate model ends at the final window assembly?

Response: thank you for noting this: correction made.

Procedural questions;

1. How are these interpretation requests handled? Does the MOU industry group or does IERE answer these points with an official reply?

Response: As the program operator, IERE is responsible for responding to these questions.

2. Is it permissible for this business to business PCR be used to market information to consumers and to create a label program ?

Response: ISO 14025 requires that business to consumer labels cover the entire life cycle of the product, so this label cannot be used in a consumer setting.

3. Is IERE the arbiter in disputes or disagreements?

Response: As the program operator, IERE is responsible for responding to these issues.

4. This project started with the promise of a consumer and use phase included cradle to grave format. This needs to be completed. When will this be completed?

Response: no timeline has been developed yet for this task.

5. May any program operator create and verify EPDs to this PCR or must they all be created and verified by IERE?

Response: IERE's GPI allows any party to perform the LCA study and verify the EPD, as long as the verifier is independent and is a certified LCA professional. Publication is required to be done through the Earthsure program.

6. Are industry wide EPD's allowed to this PCR, such as one EPD for all windows, or one EPD for all Wood windows? Or must each company create their own EPD?

Response: Each company must create its own EPDs. The diversity of windows is such that it is not possible to derive a single EPD for the industry at this time. This may change as more industry data is developed.