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Labeling Requirements -

Currently, Section 10-113 (Certification and Labeling of Roofing Product Reflectance and Emittance), subsection (a) Labeling Requirements reads that "Every roofing product installed in construction to take compliance credit or meet the prescriptive requirements for reflectance and emittance under Sections 140.1, 140.2, 140.3(a)1, 141.0(b)2B, 150.1(c)11, 150.2(b)1H or 150.2(b)2 shall have a clearly visible packaging label that lists the emittance and the initial and 3-year aged solar reflectance, or a CRRC Rapid Rating for solar reflectance, tested in accordance with CRRC-1.

Within the 2019 California Building Code, there are examples where a roofing product or systems are call to be tested in accordance to a standard (such as CRRC-1) that are managed and overseen by an external third party entity (such as CRRC). However, in those instances, the results are not required to be published on the product packaging.

Within the paragraphs under subsection 1504.3 (wind resistance of nonballasted roofs) are requirements for roof systems to be tested in accordance to testing standards (such as FM 4474, UL 580) without any labeling requirements listing the results of testing for the products

Under section 1505 (Fire Classification), subsection 1505.1 states "...roof assemblies and roof coverings...shall be tested in accordance with ASTM E108 or UL 790." The listing requirements are found in subsections 1505.2 through 1505.4, each stating "...roof assemblies and roof coverings shall be listed and identified...by an approved testing agency."

It is reasonable to administer field verification for reflectance in the same manner as other material assembly attributes as outlined above.

RCMA proposes that for the 2022 edition, Section 10-113 be amended to read:

â€œEvery roofing product installed in construction to take compliance credit or meet the prescriptive requirements for reflectance and emittance under Sections 140.1, 140.2, 140.3(a)1, 141.0(b)2B, 150.1(c)11, 150.2(b)1H or 150.2(b)2 shall have a clearly visible packaging label that the product as been tested in accordance with CRRC-1 with the emittance and the initial and 3-year aged solar reflectance, or CRRC Rapid Rating for solar reflectance listed and identified by the supervisory or approved testing agency.â€