

# 2017 NATIONAL POLICY AGENDA





## About WDMA

Founded in 1927, the Window & Door Manufacturers Association (WDMA) is the premier trade association representing the leading manufacturers of residential and commercial window, door and skylight products for the domestic and export markets. WDMA members are focused on Total Product Performance™ products that are designed and built to performance-based standards. Member companies manufacture and supply sashes, frames, window units, skylights, flush doors, stile and rail doors, and sliding patio door units for residential, commercial and institutional markets, selling to distributors, dealers, builders, remodelers, architects, contractors and other specifiers. WDMA's member manufacturers are leading America's efforts to develop and utilize energy-efficient windows, doors and skylights for both new and replacement construction.



## Contact WDMA

Washington, DC Office  
2025 M Street, NW, Suite 800  
Washington, DC 20036  
(202) 367-1157

Chicago Office  
330 North Wabash Avenue, Suite 2000  
Chicago, IL 60611  
(312) 321-6802

[membersupport@wdma.com](mailto:membersupport@wdma.com)  
[www.wdma.com](http://www.wdma.com)



# DEAR POLICYMAKERS:

As lawmakers in the 115<sup>th</sup> Congress meet to consider policies that will sustain economic growth, America's window, door and skylight manufacturers stand ready to work with them and the Trump Administration to strengthen our housing sector, and protect and enhance the global competitiveness of our manufacturers. This year, Congress is positioned to break gridlock and focus on job creation and alleviating the burdensome regulations that have had a negative impact on the economy. Sound energy policy, comprehensive tax reform, and regulatory reform, among others, are critical to that end.

Congress must therefore work to ensure national energy policy supports the manufacturing sector while improving the energy efficiency of our nation's homes and buildings. Policies and incentives to increase consumer purchases of affordable, energy-efficient windows, doors and skylights are a powerful tool to both reduce our nation's energy use and spur job creation. We estimate there are nearly one billion single-pane windows in existing housing stock alone. A national energy policy that includes energy efficiency targets should reflect the gains that would be realized by replacing those windows, as well as inefficient doors and skylights, with more efficient products, such as ENERGY STAR® qualified products. Green building incentives that recognize all credible green building programs can also play a critical role in expanding the market for more energy efficient windows, doors and skylights.

We also support comprehensive tax reform that enables window, door and skylight manufacturers and other industries to compete fairly and to continue to provide jobs. As Congress considers tax reform, the preservation of the mortgage interest deduction is critical to a robust housing policy that is fiscally-responsible and one that strengthens our housing sector. Government policies must continue to promote and preserve the value of homeownership.

In addition, Congress and the new Administration must ensure the overreach of the Environmental Protection Agency (EPA) is addressed and should put policies in place that ensure regulations strike the appropriate balance between protecting the public and their economic impact. Specifically, we call on EPA to reform the Lead: Repair, Renovation and Painting Rule, making it less burdensome while also protecting the public.

The enclosed policy positions outline the top priorities of the window, door and skylight manufacturing sector for the 115<sup>th</sup> Congress. We look forward to working with you in 2017 to restore and create valuable American manufacturing jobs.

Sincerely,



**Al Babiuk**  
Chair, WDMA  
CEO, Loewen Windows



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## ENERGY CONSERVATION

Manufacturers are leading America's efforts to develop and deploy innovative energy solutions. While WDMA supports efforts to secure national energy policy, it is imperative that new policies protect the economic competitiveness of the manufacturing sector.

WDMA's manufacturers are leaders in the energy efficiency movement, developing innovative technologies to cost-effectively produce durable energy-efficient windows, doors and skylights for both new and replacement construction. We support policies that aim to reduce energy consumption through proven, commercially available technologies targeted to where the greatest and most

cost-effective improvements can be made. For example, single-pane and clear double-pane (non low-e) windows are one of the largest sources of energy consumption in a home, through heat loss in winter and unwanted heat gain in summer. Replacing our nation's nearly one billion single-pane and double-pane clear windows in existing housing stock, with readily-available higher efficiency windows, such as ENERGY STAR® certified products, should be a primary objective of any new remodeling or retrofitting programs. Durable windows, doors and skylights from commercially available technologies such as those offered from WDMA manufacturers should be selected to insure a second replacement will not be required for many years.

The industry works cooperatively with government and non-governmental entities to continuously improve standards, regulations and programs that will advance the energy efficiency of the entire building envelope through technologically-advanced fenestration products. As state and local governments have taken an increasingly active role in promoting energy-efficient buildings through building codes and mandates, the need for a balanced national policy is clear. Building codes and standards that govern fenestration products must be based on sound science, durability, long-term performance and material neutrality (meaning the requirements do not vary based on a difference of frame/sash material selection). They should also be practical and developed under processes that allow for adequate participation from all interests and consider all concerns. The pace at which standards and programs are revised, moreover, should take into account whether sufficient time has been allowed for existing technologies to be proven and widely adopted.



# ENERGY CONSERVATION CONTINUED

A national energy policy must take into account varying climates across the nation and allow flexibility in the types of products and materials used to attain the desired energy savings. Federal, state and local policies must also consider the affordability and feasibility of new requirements to ensure that consumers are able to take full advantage of available incentives.

While WDMA supports uniform and fully enforced national energy conservation codes, it is important to recognize that different regions of the country require different energy criteria to achieve improved energy efficiency based on their climate zone. A window, door or skylight designed to protect from the cold winters of the north may not be ideal to face the heat of a southern summer. For this reason, any incentives should be tied to ENERGY STAR®



Version 6.0 requirements and similar standards that recognize and account for regional climatic differences.

1. WDMA supports a balanced national energy policy that:
  - Includes energy efficiency as a key component, recognizing the value of reducing home and commercial building energy consumption;
  - Recognizes and supports replacement of windows, doors, and skylights as a cost-effective and proven method of reducing residential and commercial building energy use;
  - Encourages the use of energy-efficient products while taking into account affordability, durability, return on investment and market availability of specified products;
  - Bases energy conservation targets for new construction on sound science, and reasonably achievable and durable technologies that are cost effective, commercially available and implemented under timelines that can be realistically met by the industry;
  - Encourages programs for the retrofit of existing homes and buildings to make them more energy-efficient based on ENERGY STAR® Version 6.0 program qualification requirements;
  - Rewards product manufacturers that embrace technology in manufacturing windows, doors and skylights that are both energy efficient and durable; and
  - Recognizes all of the positive impacts provided by energy efficient windows, doors and skylights, including daylight, fresh air, enhanced indoor environmental quality and related health benefits.
2. WDMA supports uniform energy conservation regulation in state and local jurisdictions through the adoption of national model energy conservation codes that are:
  - Developed under nationally recognized accredited consensus procedures that allow for full participation by stakeholders in the development and amendment processes, such as the International Energy Conservation Code (IECC);
  - Based upon commercially viable and durable technologies;
  - Cost-effective, affordable, and practical; and



- Based upon regional climatic differences through a limited number of defined climatic zones, such as those established by the International Code Council's (ICC) International Energy Conservation Code (IECC) and EPA's ENERGY STAR® program and that provide requirements accordingly in a simplified format.
3. WDMA supports improvements to ENERGY STAR® programs that promote the use of ENERGY STAR® windows, doors and skylights in new construction and for the replacement of inefficient single pane and clear dual pane windows, doors and skylights in existing housing stock.
  4. WDMA supports ENERGY STAR® qualifying criteria that are based on a minimal number of climatic zones, are presented in a simplified, consumer-friendly format and do not impose costly, unnecessary testing and labeling requirements.
  5. WDMA supports periodic changes in ENERGY STAR® qualifying criteria for windows, doors and skylights that are:
    - Based on sound ENERGY STAR® market penetration data;
    - Cost effective, affordable and commercially available technology and which provide consumers with a payback on their investment of no more than 10 years; and
    - Technologically feasible and implemented under reasonable timelines for manufacturers; and developed under a robust and open collaborative process between EPA and its ENERGY STAR® partners and stakeholders.
  6. WDMA supports uniform adoption and enforcement of national model energy conservation codes and when tax credits or other forms of governmental incentives are implemented to encourage the use of energy efficient products, they should be applicable to all energy-efficient window, door and skylight products/technologies that meet reasonable performance standards.
  7. WDMA supports the National Fenestration Rating Council (NFRC) as the energy rating system for residential and commercial fenestration systems and supports simplified rating and data programs, the addition of new fenestration ratings as justified, and ratings that focus on complete fenestration systems.
  8. WDMA supports market-based and consensus-driven solutions to reduce emissions.
  9. WDMA supports legislation to modernize public buildings through energy efficiency upgrades.



## BUILDING CODES

Building codes and standards play a fundamental role in ensuring that public health, life safety and welfare are adequately provided for in the construction and renovation of residential and commercial buildings. Nearly all jurisdictions in the U.S. regulate building construction through the adoption of nationally recognized model building codes and standards, or codes and standards consistent with them. These codes and standards address every aspect of building design and the materials that are used to construct them, including windows, doors and skylights, which provide essential natural light, exterior viewing, ventilation, security, energy conservation, occupant comfort, and protection from fire and natural hazards among other benefits. Building codes and standards that govern these components must be based on sound science, practicality, performance and material neutrality, and they must be developed under processes that adequately allow for participation of all interests and consideration of all concerns to ensure the objectives of providing for public health, safety and welfare in the built environment are properly met.

1. WDMA supports national model building codes that:

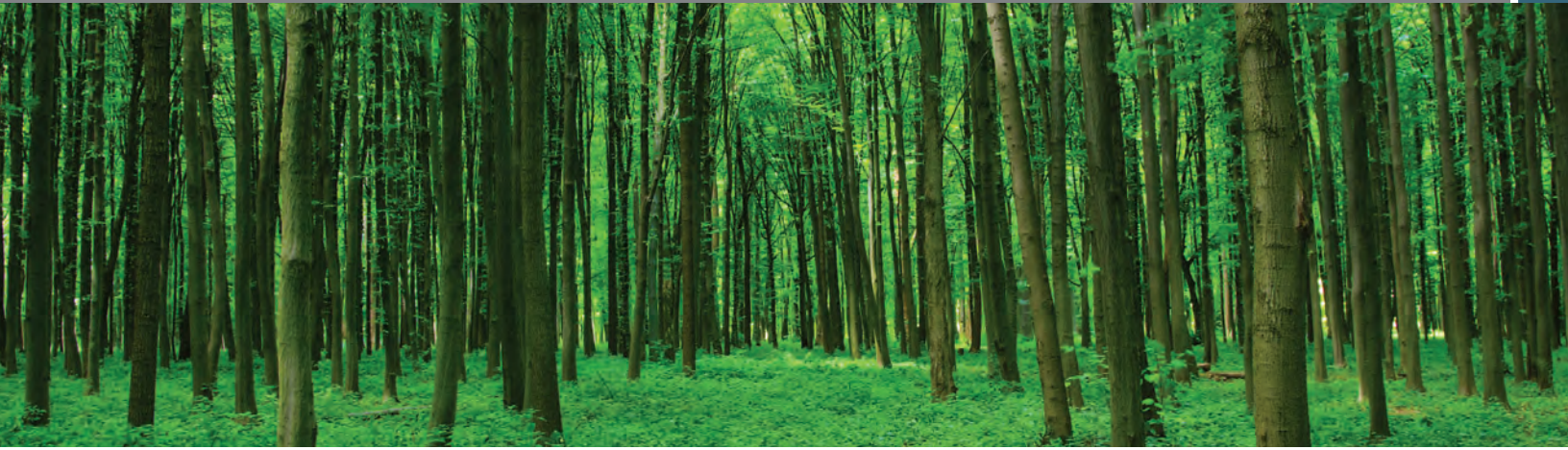
- Are developed and revised under nationally recognized consensus development processes open to participation by all stakeholders, e.g., those processes used by the International Code Council (ICC), American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE), and the National Fire Protection Association (NFPA);
- Include requirements for windows, doors and skylights that are appropriate for each product type, justified by sound data/science, can be reasonably met using current technology, and are cost-effective;
- Include requirements for windows, doors and skylights that do not discriminate against the use of any of particular types of products or do not have a bias toward specific materials;
- Include requirements for natural ventilation and design for day lighting in residential and commercial buildings; and
- Reference the most current edition of the North American Fenestration Standard (NAFS) for testing and labeling requirements and impose none that are duplicative of those contained in the NAFS.

2. WDMA supports the Department of Energy's (DOE) participation in the development of national model energy codes and standards and recognizes the Agency's role as a technical advisor in it, provided that the Department's participation is fully transparent including;

- Publication of draft DOE proposed amendments to national model energy codes and standards, as well as the analytical methodologies, justification, feasibility, and other supporting information and data for them, in the Federal Register for public review and comment prior to advancing them; and
- DOE determinations regarding the energy efficiency improvements in national model energy codes and standards are made in full accordance with the direction given the Department to do so under the Energy Conservation and Production Act (ECPA).

3. WDMA supports legislation that ensures DOE's participation in the national model energy codes and standards development processes is transparent as noted above.

4. WDMA supports nationwide, state and local adoption and enforcement of consensus-based national model building codes that conform to WDMA building code policy.



## ENVIRONMENTAL STEWARDSHIP

WDMA member companies are committed to sound stewardship of our natural resources. The manufacturing sector's reliance on affordable energy sources dictate that our national energy policy include support for alternative and renewable fuels. WDMA believes environmental policies should be based on voluntary, cost-effective actions that strike a balance between protection of the environment and our domestic manufacturing competitiveness.

The use of technologically advanced fenestration products is a key component in the construction and renovation of energy-efficient homes and buildings. Financial incentives are an important tool to facilitate the purchase of energy-efficient products for new or existing construction and should be implemented in a way that is cost-effective for the consumer.

1. WDMA supports green building codes, standards and rating systems that are developed and revised under nationally recognized consensus development processes that allow for participation by all stakeholders, and that are based on sound science, cost-effectiveness, feasible technology and material neutrality. In addition, WDMA supports the uniform application of them nationwide rather than state and local jurisdictions creating separate and differing requirements or rating systems.
2. WDMA supports the use of all credible green building certification programs, codes, standards, and rating systems for federal construction projects that are developed and maintained under nationally recognized, accredited consensus development processes. WDMA opposes the designation of a single program or set of requirements for all federal building projects.
3. WDMA supports sustainable manufacturing facility policies and programs that promote continuous improvement in functional use, as evidenced by registration under ISO 14001 or equivalent standards.

4. WDMA supports promoting the use of durable green building products and technologies through state or local adoption of voluntary green building programs and other incentive programs that encourage green building, such as special financing, rebates, or other financial assistance for new construction and energy efficient remodeling.



# ENVIRONMENTAL STEWARDSHIP CONTINUED

5. WDMA supports the creation of financial incentive programs that promote the retrofitting of existing homes and buildings to incorporate green building materials and improved energy conservation features.
6. WDMA believes any incentives for green buildings should be based on a whole structure approach that allows for trade-offs within the materials selected and does not unfairly favor certain products within the building envelope.
7. WDMA supports balanced, scientifically-based environmental stewardship policies with measurable and attainable goals for domestic manufacturers, without putting domestic manufacturers at a competitive disadvantage with foreign manufacturers.
8. WDMA believes EPA's Boiler Maximum Achievable Control Technology (MACT) rules should be supported by sound research, ensure consistency across operating parameters and not be overly burdensome for manufacturers.
9. WDMA supports cooperative industry efforts to develop guidelines for performing life cycle assessments and for developing environmental product declarations for windows, interior doors, skylights and architectural doors.





## BUILDING SAFETY

The proper selection, installation and use of windows, doors and skylights is essential to the safe occupancy of homes and commercial buildings. The materials used to manufacture them must also be safe. Manufacturers are subject to codes, standards and other regulations that govern fire-rated doors, fire-rated and impact-resistant glazing, emergency escape and rescue, window and skylight opening protection and other window, door and skylight safety-related issues. Building codes, standards and regulations that govern these issues must be based on sound science, technologically-feasible, have proven benefit and developed under processes that adequately allow for participation of all interests and consideration of all concerns to ensure the objectives of public health, safety and welfare in the built environment are properly met.

1. WDMA supports the inclusion of fire-rated door provisions in national model building codes and supports the use of NFPA 80: Standard for Fire Doors and Other Opening Protectives.
2. WDMA supports efforts to address health related concerns in the built environment such as potential exposure to harmful levels of lead and formaldehyde, with approaches that are based on and justified by sound data/science, provide proven benefit, are technologically feasible, and that consider cost. These approaches should also supersede individual and differing state rules.
3. WDMA supports addressing safety issues, such as window and skylight fall protection, with approaches that are based on and justified by sound data/science, are cost-effective, technologically-feasible and balanced with other code provisions related to window, door and skylight safety issues such as emergency escape and rescue. WDMA opposes efforts that trade off proven life safety elements such as smoke detectors and emergency escape and rescue openings for fire sprinklers.
4. WDMA supports unified national standards for building accessibility, based on sound technical verification, balanced by practical overall product performance requirements. WDMA supports ANSI A117.1 as the recognized standard for establishing minimum criteria for accessible construction and encourages direct adoption of that standard or its criteria into building codes.
5. WDMA supports legislation amending EPA's Lead: Renovation, Repair and Paint (RRP) rule to make compliance less burdensome for contractors while also protecting pregnant women and children under the age of 6 from lead exposure.
6. WDMA believes that EPA must identify a lead hazard before proposing any expansion of the RRP rule to cover activities in public and commercial buildings.
7. WDMA supports the streamlining of training requirements under the RRP Rule for remodelers seeking recertification to perform work in pre-1978 homes.



## HOUSING AND ECONOMIC POLICY

WDMA's members support a robust housing policy that is fiscally responsible and ensures healthy housing markets, a prerequisite to our nation's sustained economic recovery. We believe government policies must continue to promote and preserve the value of homeownership. Access to financing for home purchases and new starts continues to be overly constrained; increasing access to financing for new construction, mortgages and home renovations should be a priority. As home building and renovation activities increase, we believe there will continue to be a strong emphasis on building "green." WDMA supports voluntary consumer incentives that make ENERGY STAR® and other qualified fenestration products more affordable.



1. WDMA supports targeted federal programs that support private sector growth and affordable housing, including:
  - Programs that encourage use of energy-efficient products in new construction and energy-efficient renovation programs;
  - Efforts to stimulate the housing industry and to spur demand for new construction and remodeling; and
  - Fiscally responsible and sound affordable housing programs that make the dream of home ownership available to more Americans.
2. WDMA believes any reform of federal housing programs must include a financial backstop to ensure that 30-year, fixed-rate mortgages and reliable mortgage financing remain readily available and affordable.
3. WDMA actively supports green building incentives that recognize all credible green building programs (e.g. LEED, ICC-700, Green Globes), that are product-neutral and that expand the market for ENERGY STAR® and other qualified window, interior door, skylight and architectural door products.
4. WDMA supports federal regulatory reform legislation, including updates to the Administrative Procedure Act, that increases transparency and ensures federal regulation is appropriate, cost-effective, and consensus-based.



## TAX POLICY

America's manufacturers are often disadvantaged by the current tax structure. WDMA supports tax reforms that level the playing field to enable our manufacturers to be more competitive and continue to provide jobs. Comprehensive tax reform should not adversely affect manufacturers or their dealer, distributor, contractor and consumer customers. The residential energy-efficient (25C) tax credit has been a powerful tool to preserve jobs within our member companies and their supply chain. WDMA will continue to support sound fiscal policies that seek to spur consumer purchases of energy-efficient windows, doors and skylights to increase their use in new construction and retrofitting of existing homes and buildings.

1. WDMA supports tax reform policies that place manufacturers on an equal playing field with foreign competitors and equitable tax treatment of window, door and skylight manufacturers that protects the ability to provide quality jobs in the manufacturing sector.
2. WDMA supports keeping the mortgage interest deduction and opposes attempts to weaken or eliminate a cornerstone of American housing policy, which provides benefits to homeowners at all income levels and enjoys overwhelming public support.
3. WDMA supports programs that encourage the use of energy-efficient products in new construction and energy-efficient renovation programs and that are tied to NFRC-certified ratings and ENERGY STAR® Version 6.0.
4. WDMA supports extension of increased Section 179 expensing limits, bonus depreciation and other tax incentives that enable manufacturers to more readily make new capital investments and to recognize tax benefits of those improvements in a timely manner.
5. WDMA supports preservation of the last-in, first-out (LIFO) accounting principle, the repeal of which would lead to a significant tax increase, decrease in working capital, inaccurate inventory evaluation and reduced competitiveness.
6. WDMA supports estate tax policy that protects the ability of multi-generation, family-owned manufacturers to survive into the next generation.
7. WDMA supports maintaining the capital gains exclusion on the sale of a principal residence.
8. WDMA supports corporate income tax reform by lowering tax rates but keeping government tax revenues neutral, by eliminating certain deductions, credits or other items.
9. WDMA supports a territorial tax system, like most developed countries, so that foreign profits, already taxed, are not subject to U.S. taxes on repatriation.
10. WDMA supports the current tax deduction for advertising expenses and opposes efforts to reduce or eliminate it.



## PRODUCT SUPPLY AND TRADE

WDMA members rely on continued access to raw materials from domestic and imported sources necessary for manufacturing windows, doors, skylights, and architectural door products. Trade policies should allow for the legal importation of wood and significantly contribute to reducing illegal logging. We support responsible forest management and natural resource policy that balance environmental stewardship of natural resources with the need to maintain stable and predictable access to raw materials to ensure our continued ability to manufacture fenestration products both domestically and abroad.

1. WDMA supports responsible forest management programs, such as the Sustainable Forestry Initiative (SFI) and the Forest Stewardship Council (FSC) and others, that balance

environmental stewardship with the need to maintain stable and predictable access to raw fiber and timber products needed for the manufacture of windows, interior doors, skylights and architectural door products.



2. WDMA supports efforts to increase the availability and use of certified wood products, including SFI, FSC and others, through the US Green Building Council (USGBC)'s LEED, the National Green Building Standard (NGBS), Green Globes and other green building programs.
3. WDMA supports natural resource and trade policy that ensures continued access to and sustainable use of raw materials, domestic and imported, necessary for manufacturing windows, interior doors, skylights and architectural door products.
4. WDMA supports efforts to enact a new Softwood Lumber Agreement between the United States and Canada that it believes reasonably ensures a supplemental supply of lumber is accessible to domestic consumers.
5. WDMA supports legislation clarifying the regulatory guidelines and enforcement rules of the Lacey Act, bringing the declaration requirement in line with its intended purpose of prohibiting the trade of products made with illegally harvested wood while reducing excessive and unnecessary costs to the regulated community.



## WORKFORCE/WORKPLACE

Human resource policy that governs our workforce must balance the rights of workers and employers, and not unfairly restrict the ability of manufacturers to offer to negotiate freely with their employees. The health and safety of our employees is our foremost concern, but the development of new regulations must take into account the administrative burdens of compliance.

1. WDMA supports the preservation of secret ballot elections as the fairest way to guarantee the rights of employees to freely choose whether or not to be represented by a union and supports the ability of employers and employees to negotiate freely, without departing from existing timelines for elections that are well-known and accepted.
2. WDMA opposes legislation that would remove workers' rights to secret ballot elections to determine union representation and any other such effort, which would institute binding mandatory arbitration, or otherwise restrict the ability of employers and employees to negotiate mutually-beneficial employment terms.
3. WDMA opposes other proposals that attempt to confer a tactical advantage on organizers and that deprive the employer and its employees of the time and opportunity to get all the facts before an election is held.
4. WDMA opposes efforts to expand the instances where third party advice used by employers to inform employees about their rights to collectively bargain, would have to be disclosed.
5. WDMA supports robust programs for protecting the health and safety of workers, including safety and training requirements that are justified, provide a demonstrable safety benefit and that do not add onerous cost or administrative burden to comply.
6. WDMA supports legislation guaranteeing an employer's ability to participate in a fair union election and ensuring employees are able to make fully informed decisions about joining a union. Additionally, WDMA opposes regulatory efforts to reduce the amount of time employers have to communicate with their employees between the time they learn that a union is trying to organize the workforce and the election.
7. WDMA supports government policies addressing the shortage of qualified candidates for high-skilled jobs by improving the STEM (Science, Technology, Education and Mathematics) education system and other efforts to increase the pool of qualified candidates for jobs in manufacturing.



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