

Ibec response to DCENR/SEAI informal industry consultation on Part 3 of S.I. 426/2014 derived from Article 8, Energy Efficiency Directive

Ibec welcomes the opportunity to respond to the DCENR/SEAI informal consultation on the creation and maintenance of the National Registration Scheme for Energy Auditors, the minimum criteria for energy audits and the qualification/accreditation of auditors. The deadline for reporting compliance with the auditing aspect of the Regulation is fast approaching, therefore a timely yet robust response is required in the coming months to assist obligated parties meet this requirement of the Regulation.

Do you wish to outline any recommendations to SEAI/DCENR around the establishment of a National Registration Scheme for Energy Auditors?

It is important that registered energy auditors have the relevant experience and competencies to complement the site(s) they are contracted/responsible for auditing. The qualifying criteria for energy auditing requirements (i.e. companies that are not SMEs or subject to turnover/balance sheet thresholds¹) require a broad range of sites/company types to undergo an energy audit, including industrial / manufacturing sites, commercial sites and retail units.

SEAI/DCENR should place the same requirements around the registration scheme as those being applied for ESOS in the UK. A significant number of Ibec members proposed adopting a similar approach to the UK Government's response to Article 8 which provides numerous routes to compliance. The Energy Savings Opportunity Scheme (ESOS) Regulations 2014 permit a combination of ESOS energy audits, Display Energy Certificates, Green Deal Assessments, or by operating Energy Management System certified to ISO 50001.² It has become an established scheme in a relatively short space of time with training/certification programmes being deployed without being overly prescriptive.

The ESOS Regulations recognise the varied competencies that will be required of approved assessors, and the National Registration Scheme for Energy Auditors should capture and list the different areas of technical/sectoral experience. PAS 51215 (Publicly Available Specification 51215) specifically relates to the competency of a lead energy assessor for energy efficiency assessments. This specification gives requirements for the competencies necessary for a person deemed capable of conducting an energy efficiency assessment.

Fees for joining the Register should be clearly displayed and subject to a maximum amount. A clear set out guidelines for the auditor and participant should be developed in tandem with the Register eligibility criteria. The Register should also be accompanied by a standardised template in order to align all audits to the same level of presentation and provide for simplified quality assurance and auditing. The body/content of the audit findings can be site or category/sector specific but with standardised presentation (i.e. reference numbering, timelines).

The auditors should only be registered to perform audits relevant to the type (industrial, commercial, retail etc.) of demonstrated experience / competencies.

No guidance has issued from the EU Commission yet around the “mobility” issue – do you think the Irish scheme should recognise internationally qualified auditors who apply for registration here?

Ibec's members support recognising internationally qualified auditors provided they meet the requirements for membership of the Register as set down by SEAI.

The UK ESOS scheme is allowing 'mobility' to a point. If an accredited Certified Energy Manager (CEM) in Ireland is registered to the Association of Energy Engineers (AEE) Chapter in Ireland, they can apply to the AEE Chapter in the UK and be automatically registered under the ESOS guidelines

¹ S.I. No 426 of 2014 *European Union (Energy Efficiency) Regulations 2014* requires companies that are not SMEs to carry out an energy audit.

² S.I. No. 1643 *The Energy Savings Opportunity Scheme Regulations 2014*

as the CEM is an international qualification. Equally CIBSE has an Irish branch which could use as a basis the CIBSE accreditation system in UK ³.

Recognising auditors from other Member States deemed qualified to undertake auditing work to comply with Article 8 of the EED will facilitate energy auditing/management Centres of Excellence within multinational companies making audits more transferrable and measurable internally. One of our members pointed to the benefit of having one “ESOS Lead Assessor” to undertake the auditing work in sites in Ireland and the UK.

Should the scheme attempt to link in with international schemes for auditor exchange possibilities?

Yes as this will assist in spreading international best practice and standards.

Existing in-house auditors will have to apply for registration too. Are there any exemptions we should apply?

The same certification and assessment requirements should apply for internal auditors as for external ones.

According to the Directive the SEAI must randomly quality check a statistically significant number of audits. How should they meet this requirement in practice?

The quality of the audits should be ensured along with policing compliance with the Regulation. A random sample of audits could fail to take account of the broad sectoral skillsets that will be required to undertake energy audits in industrial, commercial and other environments that come within the scope of this Regulation. The sample must be sufficiently representative, check the quality of the auditor and their recommendations, and take account of internal and external audits if the spirit of Article 8(1)(b) of the EED is to be realised.

SEAI could work with professional bodies for qualified auditors to assist in enforcing ‘high quality energy audits’ of their members.

Whilst SMEs are not obligated under the Regulations, what immediate steps do you think we should take to promote energy audits to them?

Article 8(2) of the EED suggests a number of routes to in order to promote SME energy audits including, but not limited to, exchequer funded grants. The European Commission Communication on *Energy Efficiency and its contribution to energy security and the 2030 Framework for climate and energy policy* addresses the innovative financing solutions required for energy efficiency measures beyond pure grant funding in realising energy efficiency objectives out to 2030.⁴ Therefore, it is important to discuss the potential suite of funding supports that could be developed to assist SMEs with the cost of setting up ISO 50001 or similar.

SEAI should develop implementation briefing packs and large ISO 50001 accredited companies could be requested to assist neighbouring SMEs wanting to achieve certification by hosting visits to share their experience of implementing the standard.

Other issues: The four year auditing timeframe will introduce a “boom and bust” cycle for energy auditors. This will be the case for the companies that are not SMEs or subject to turnover/balance sheet thresholds. To facilitate better phasing of audits, companies with large identified energy savings potential should be required to perform another audit in 2 years – before getting into the 4 year cycle. The incremental take-up of auditing among smaller energy users – SMEs - if promoted effectively will help even out the workload for auditors. Furthermore, the option of staggering the

³ <http://www.cibse.org/Knowledge/Energy-Savings-Opportunity-Scheme-ESOS/CIBSE-ESOS-Scheme-up-and-running>

⁴ European Commission, *Energy Efficiency and its contribution to energy security and the 2030 Framework for climate and energy policy*, COM(2014) 520 final

compliance requirement for multi-site organisations should be discussed at the workshop on the 22 January.

90% requirement

Ibec members are in favour of the “90% of total energy use” but request that the guidance note provide clarity on other indirect energy users/requirements. The matter of transport needs to be well defined for commercial transport, business travel (cars, non-commercial vehicles) and internal company travel. Personal cars used for business travel should be excluded.

Life-cycle analysis and “validated calculations”

There are some concerns that this may impose overly onerous obligations on procurement requirements. It would be useful to have a dedicated session on this aspect during the workshop on 22 January.