

Operational Delivery of EPCs in Europe – Case Study

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Area of interest	Summary of the situation in Ireland
Overview of Governance Model	The EPBD Implementation in Ireland is coordinated by senior officials of the following bodies with sufficient authority to make decisions and allocate resources: Department of Environment, Climate and Communications, Department of Housing, Local Government and Heritage, and the Sustainable Energy Authority of Ireland (SEAI). The SEAI is responsible for administering the EPC scheme, which is called a Building Energy Rating (BER) scheme in Ireland. SEAI also govern the registration and performance of BER assessors.
Affordability	The price of a BER assessment is controlled by the market, meaning it can vary based on the supplier and size of a building. Prices are approximately €150 in apartments, while the cost for a standard house is between €200 and €300. Moreover, a levy of €30 is in place for the publication of a Domestic BER Certificate.
Minimum qualifications, training and accreditation for EPC assessors	Assessors are required to either hold an NFQ level 6 certificate in a construction-related disciplines or equivalent (demonstrated by a combination of appropriate construction-related qualifications or relevant experience). Assessors must also complete an accredited Domestic BER Training Course and achieve a minimum of 70%. Continuous professional development is obligatory for all BER assessors.
Auditing, verification and QA	Ireland conducts audits on both a targeted and random basis. Targeted audits are mostly desk-based reviews, but on-site audits are also conducted when certain risk factors are met. Training audits are also carried out for newly qualified assessors. The SEAI have implemented a penalty point system, whereby the level of penalty imposed on assessors depends on the severity of the assessor infraction. The nature of these penalties ranges from corrective training to the permanent suspension of the license.
Enforcement	The solicitor managing the sale of the property is responsible for checking the presence of an EPC at the point of sale. Failure to present a

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	BER certificate at the time of rental or sale can result in financial or judicial penalties, with fines ranging from €500 to €5,000. Criminal records and prison sentences are also a possibility. Compliance with the requirement is higher with property sales than with property rentals.

Contents

1	Introduction	5
1.1	Implementation of the EPBD and EPC regimes.....	5
1.2	Issuing and pricing of EPCs in Ireland.....	5
2	Approach to Assessor Accreditation and Recertification	6
2.1	Pre-requisites for assessor accreditation.....	6
2.2	Assessor certification process.....	6
2.3	Requirements for recertification	7
3	Auditing, Verification and Quality Assurance in the Production of EPCs	7
3.1	Approaches to QA of EPCs	7
3.2	Approach to assessor infractions.....	8
4	Enforcement Mechanisms	9
4.1	Approach to Enforcing the Requirement to Present an EPC at the Point of Sale/Rental of a Property	9
4.2	Compliance rates in Ireland	9
5	Conclusions	10
6	References	11

Glossary and Abbreviations table

BER	Building Energy Ratings
BER CoC	BER Assessors Code of Conduct
EPBD	Energy Performance of Buildings Directive
ICS	Independent Control System
MS	Member State
QADP	Quality Assurance System and Disciplinary Procedures
QQI	Quality and Qualifications Ireland
SEAI	Sustainable Energy Authority of Ireland
NFQ	National Framework for Qualifications

1 Introduction

1.1 Implementation of the EPBD and EPC regimes

As per the Energy Performance of Buildings Directive (EPBD), Ireland has implemented an Energy Performance Certificate (EPC) scheme, known as the Building Energy Ratings (BER) scheme. Annex IV of the EPBD outlines the requirement set in Article 27 for Member States (MSs) to ensure that an Independent Control System (ICS) for energy performance certificates is implemented. The objective of the ICS is to guarantee the quality of the EPC and of the associated QA procedures. MSs are free to delegate the responsibility for implementing the ICSs as they deem fit (European Commission, 2024).

The Irish Government has allocated the responsibility of implementing the EPBD to the Sustainable Energy Authority of Ireland (SEAI). The SEAI is a government agency established to help households, businesses, communities and government in Ireland to transition to cleaner energy (SEAI, 2017c). The Energy Performance of Buildings Regulations adopted in 2012 state that quality assurance processes in Ireland are the responsibility of the issuing Authority, i.e., the SEAI. The SEAI is responsible for the BER scheme, as well as governing the registration and performance of BER assessors (SEAI, 2016). The SEAI is also in charge of implementing Quality Assurance System and Disciplinary Procedures (QADP) for BERs, in line with the SEAI's QADP document. This involves conducting audits and adopting disciplinary action where necessary (SEAI 2016).

1.2 Issuing and pricing of EPCs in Ireland

BER ratings in Ireland range from A to G, with A representing the most energy efficient buildings, with multiple sub-levels (A1, A2, A3, B1, B2, B3, C1, C2, C3, D1, D2, E1, E2) (SEAI, n.d.d). 813,567 Domestic BERs have been administered in Ireland to date, the largest number of which were administered with C2 (104,613) or C3 (99,146) grades. 55,246 BERs were administered with a grade of G (Hughes, 2020).

EPC price regulation

The price of a BER assessments in Ireland is controlled by the market, therefore it can vary based on the supplier and size of a building. The costs of BER assessments in apartments are approximately €150, while the cost for a standard house is between €200 and €300 (Citizens Information, 2024). Moreover, a levy of €30 is applied for publication of a Domestic BER certificate. However, the SEAI does subsidise BER costs for properties approved to receive loans for home energy upgrade. An Irish BER expert interviewee anticipates that the latest revision of the EPBD (adopted in 2024) will address affordability, especially for low-income households and energy-poor situations.

2 Approach to Assessor Accreditation and Recertification

2.1 Pre-requisites for assessor accreditation

The SEAI have established a series of requirements in the BER assessors Code of Conduct (BER CoC) document which are necessary to be accredited as a BER assessor in Ireland (BERCert, n.d.). The BER CoC sets out two pathways to BER assessor accreditation:

1. BER assessors must hold a National Framework for Qualifications (NFQ) Level 6 Advanced/Higher certificate in construction-related disciplines (such as Architecture, building construction, building design, Engineering and Quantity Surveying) (SEAI, 2017b) (SEAI, n.d.c).¹
2. Applicants can also demonstrate that they hold a recognized equivalent to this certificate.

The second route is deliberately flexible,² but can be met through a combination of appropriate construction-related qualifications and proof of significant relevant experience. For example, a Level 6 Advanced/Higher Certificate in a non-construction-related subject and 2 years full-time professional experience in a construction-related environment could be considered equivalent. This is because it enables the applicant to demonstrate a basic understanding of domestic building systems. (SEAI, 2017b) (SEAI, n.d.c).

2.2 Assessor certification process

BER Assessors must complete the Quality and Qualifications Ireland (QQI) Accredited Domestic BER Training Course, which is approved by the SEAI, to register as a BER Assessor. The Training Course is delivered by a series of certified private providers (companies include Chevron, Occupli, National Energy Assessors, and Property Health Check). Applicants must obtain a minimum grade of 70% in the QQI accreditation course (SEAI, 2017a). When they have completed the training course, applicants must complete and submit a Domestic BER Assessor Registration Form. The form requires applicants to submit proof of meeting the pre-qualification criteria, completion of the BER training course, assessor registration details (both public and private), and company details (such as Tax Clearance details) (SEAI, n.d.b).

An Irish BER expert interviewee expressed that while they believed the current assessors held the right skillset, they anticipated that the new EPBD might require higher levels of training and different competencies for BER assessors. As technologies and building practices evolve, assessors will need to adapt and develop a new skillset³.

¹ NFQ Level 6 Advanced and Higher certificates are achieved after the completion of a Leaving Certificate from Secondary Education (Level 4 and 5 Certificates). They take about two years to complete. The Advanced certificate programmes teach a comprehensive range of vocational and occupational skills.

² Information obtained in an interview with an Irish BER expert.

³ Information obtained in an interview with an Irish BER expert

2.3 Requirements for recertification

Registration as a BER assessor expires after one-year. Assessors are notified about their registration coming to an end one month before and are required to provide proof of payment of fees, in-date insurance policies, and may also be subject to additional educational or administrative requirements (SEAI, 2017a). Continuous Professional Development is required for all registered BER assessors, however (SEAI, n.d.g). The SEAI does host regular educational webinars, however, for which participation is mandatory for assessors to remain certified⁴. Assessors are also required to take a BER Refresher Course in the following cases:

- When a first-time entrant completed the Training Course over 24 months ago
- When a previously registered BER assessor is re-entering the BER Register, having not been registered to the BER register for the preceding 24 months (or more).

In the latter case, assessors must also resubmit the Domestic BER Assessor Application Form (SEAI, 2017a).

3 Auditing, Verification and Quality Assurance in the Production of EPCs

3.1 Approaches to QA of EPCs

The SEAI is responsible for regulating the Quality Assurance process of BERs. A national register has been set up that lists BER experts and assessments. The register can be searched for by name, building typology and geographical area (Kranzl, 2020). The SEAI lists in their schedule of fees that a levy is charged to BER Assessors for publication of BER Certificates (€30 for Domestic and €60 for Non-Domestic BERs) (SEAI, 2019).

The QA approach in Ireland consists of both random and targeted assessments, which include desk-based reviews, on-site audits, training audits and audits of individual assessors and the quality of their BERs.

3.1.1 Random sampling

The digital system checks a randomly selected statistically significant sample of BERs published in the preceding month and picks no more than one or two BERs per assessor. Between 300 and 400 digital audits are conducted a year, which an Irish BER expert reported to be sufficient to give an overall statistically significant representation of quality of BERs carried out as a whole. This number ensures conclusions on overall quality can be made at the 95% confidence level, as per the provisions set out in Annex VI of the EPBD.⁵

⁴ Information obtained in an interview with an Irish BER expert.

⁵ Information obtained in an interview with an Irish BER expert.

3.1.2 Targeted audits

Most of the targeted audits conducted are desk-based reviews, which include audits conducted on assessments flagged during the digital review. Identification of certain risk factors, for example high volumes of assessments issued or repeated infractions from a single assessor, require an in-person audit to be carried out. These are conducted less frequently due to their expensive and time-consuming nature. IA targeted audit for training, called a monitoring audit, has also been introduced to coach newly qualified experts. An expert from the SEAI accompanies newly qualified assessors within the first 2-3 BERs they publish to support them and ensure they understand the process with the view of improving and maintaining quality in the long term⁶.

Citizen complaints

The SEAI has set up a complaints and appeals form on their website that allows for citizens to submit an appeal to review a decision made under an SEAI grant programme. The SEAI does not address complaints or appeals made regarding a decision made by a BER assessor hired directly by the homeowner, however (SEAI, n.d.f).

An Irish BER expert reported that they believed Ireland's QA systems is robust and generally perceived to be one of the best in Europe. The interviewee noted that setting realistic expectations for BERs and ensuring data accuracy, robustness and flexibility are fundamental for implementing effective BER issuing and QA systems and procedures. They do suggest however that the Irish system could benefit from an element of simplification in terms of the extent of bureaucracy and administrative burden that comes with BER QA.⁷

3.2 Approach to assessor infractions

The SEAI have implemented a penalty point system, whereby the level of penalty imposed on assessors depends on the severity of the assessor infraction. The nature of these penalties ranges from corrective training to the permanent suspension of the license (SEAI, 2016). The severity of the infractions is categorised into three sub-categories.

- Severity 1 describes an infraction that has the high potential to compromise the fundamental integrity of the BER/DEC scheme, damage public confidence or otherwise negatively impact the reputation of the scheme. Such infractions result in 3 penalty points being administered (SEAI, 2016, p.8).
- Severity 2 describes infractions that are significant but, while not acceptable, are unlikely, on their own, to affect the reputation of the BER/DEC scheme. These result in 2 penalty points being administered (SEAI, 2016, p.8).
- Severity 3 describes infractions that are less significant and would not affect the reputation of the BER/DEC Scheme. These result in 1 penalty point being administered (SEAI, 2016, p.8).

⁶ Information obtained in an interview with an Irish BER expert.

⁷ Information obtained in an interview with an Irish BER expert.

When instances of non-compliance are identified in the auditing processes, BER assessors are notified in an audit report. Upon receipt of the notification, BER assessors have the right to make submissions to the SEAI, setting out any evidence or factors which demonstrates that SEAI's preliminary decision is incorrect within 14 days. Points attributed to assessors accumulate if they occur within a 2-year period. The accumulation of 10 penalty points results in the suspension or termination of registration as an assessor (SEAI, 2016).

4 Enforcement Mechanisms

4.1 Approach to Enforcing the Requirement to Present an EPC at the Point of Sale/Rental of a Property

Failure to present a BER certificate at the time of rental or sale in Ireland can result in financial or judicial penalties, with fines ranging from €500 to €5,000. Criminal records and prison sentences are also a possibility (McCarthy, 2023).

The solicitor managing the sale of a property is responsible for checking the BER at the point of sale in Ireland. Moreover, letting agents are required to produce the BER certificate and advisory report at the point of rental (Law Society of Ireland, n.d.). The Irish Government engaged the Law Society at an early stage to ensure successful enforcement. As a result of this, the requirement to present a BER assessment was added to the conveyancing checklist. According to an Irish BER expert, the addition of the requirement to the conveyancing checklist has resulted in the requirement being well-enforced⁸. For rental properties, however, the enforcement rate is not as high. This is because the process occurs directly between the homeowner and the tenant, without the involvement of a solicitor. The Irish government has collaborated with estate agents to increase the visibility of BER assessments in property rental or sale adverts. An Irish BER expert interviewee reported that estate agents were at times reluctant to publish BERs as it would require them to dedicate large amounts of space on their website. The interviewee explained, however, that introducing incentives, such as access to green funding, has been shown to encourage estate agents to ensure compliance with this requirement. The SEAI has also published [guidelines](#) to explain how best to present BERs on their website and increase engagement (SEAI, n.d.e).

4.2 Compliance rates in Ireland

A 2015 Compliance assessment report published by the European Commission outlines compliance rates reported by relevant stakeholders in each MS on the production of BERs in new buildings, or at the point of sale or rental. Estate agents in Ireland reported 75% compliance rate for rented properties and 95% compliance rate for constructed or sold properties, whilst building owners in Ireland reported a compliance rate of 75% for both rented and newly constructed or sold properties (European Commission, 2015). Compared to other EU MSs, the rates reported by estate agents for newly constructed or sold properties were around average, with eight out of twelve MSs reporting around the same level of compliance. The remaining four MSs whose estate agents provided compliance

⁸ Information obtained in an interview with an Irish BER expert.

rates for newly constructed or sold houses reported having significantly lower compliance rates (European Commission, 2015).

5 Conclusions

- Ireland has set an element of flexibility in their pre-requisite requirements for BER assessors. The prospective assessors can either meet specific educational requirements or demonstrate their eligibility through experience or EPC-related knowledge. The guidelines for this route to accreditation are deliberately flexible to allow for interpretation in determining eligibility.
- The BER assessor training course, known as the Domestic BER Training Course and approved Quality and Qualifications Ireland (QQI), is delivered by a series of certified private providers, and consists of compulsory training followed by an examination. This has resulted in assessors in Ireland having the right skillset to carry out BER assessments. However, findings suggest that the latest revision of the EPBD might require higher levels of training than what is currently delivered in Ireland.
- The Quality Assurance approach adopted in Ireland is robust and thorough, involving a two-tiered approach of both random and targeted audits. This is largely centred around desk-based reviews, with in-person audits triggered upon certain risk factors being met. However, this approach comes with a high degree of administrative burden.
- The requirement to present a BER at the point of sale of properties has been well-enforced in Ireland, as solicitors are responsible for enforcement and the Law Society in Ireland were engaged in an early stage. Some difficulties with enforcement were observed with rental properties, as solicitors are not involved in the process. Examples of how compliance was incentivised for estate agents include linking compliance with access to green funding, and publishing guidance documents.

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