

Micro Electricity Generation Association Of Ireland (MEGA)

NREAP CONSULTATION PROCESS

Submission To Department Of Communications Energy and Natural Resources

Consultation by the Department of Communications, Energy & Natural Resources on sub-section 4.2.5 of the NREAP template

Submission, as requested by DCENR,
Submitted by email to Una Dixon at NREAP@dcenr.gov.ie

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NOTE:

Please note that all comments put forward by the Micro Electricity Generation Association Of Ireland (MEGA) are designed to be constructive and to re-inforce the current policy-forming framework which is developing the final text for Ireland's National Renewable Energy Action Plan, NREAP.

The MEGA Methodology: In this consultation process MEGA will concentrate on specific areas where MEGA members have real experience and expertise. MEGA will first quote text from the sub-section. This will help to pinpoint the issue. Second, MEGA will make a submission below in this regard. This will be followed by a proposed text change. MEGA recognises that plans, once made, generally require some amendment during implementation and arising out of new knowledge but credibility is at the core of international collaboration, in this regard. Therefore, our NREAP must not only be detailed and comprehensive – it must also be credible and amenable to assessment. Ireland's NREAP will sit together with the NREAPS (Renewable Energy Action Plans) of every single other country in the EU, available to the public and once published – final. It is of extreme importance that Ireland presents itself in this context as an intelligent, smart, forward-looking and business-like country. MEGA submission, therefore, are designed, in this context, to help achieve these ends.

Summary Of Changes Requested By MEGA – Item 1 of 2

ITEM 1

Quote 1 from NREAP Sub-section 4.2.5:

“(c) Are such certification schemes / qualifications already in place? If so, please describe.

The Further Education and Training Awards Council (FETAC) and the City and Guilds (C&G)[1] are the awarding bodies of qualifications for renewable energy installers. ...For an installer to register with SEAI, they must complete the relevant course and obtain the appropriate qualification. The table below outlines the detail of the qualifications for each renewable technology....”

ITEM 1 MEGA Submission

Again the draft NREAP suggests that all is done and ready. MEGA submits that other Member State experts and experts at the commission are aware that work in this area is proceeding slowly. Funding is weak and participants are obliged to fund their own participation (this limits desirable detailed input and slows the process). Training for what? Policies and instruments to support and regulate the sector are so weak that course content and standards are not as robust as could otherwise be. The problem is that Ireland is taking a "go it alone" approach with little recourse to lessons learned and being learned elsewhere in Europe.

ITEM 1 of 2 MEGA PROPOSAL:

"MEGA proposes the following addition of text in this section:

The SEAI is housing the Standards Development Group. It is recognised that this process has been developing slowly and budgetary reviews are needed on an on-going basis to steadily make this process more robust and up to date with the rapid changes taking place in the sector."

ITEM 2 of 2

Quote 2 from NREAP Sub-section 4.2.5:

"(d) Is information on these schemes publicly available? Are lists of certified or qualified installers published? If so, where? Are other schemes accepted as equivalent to the national/ regional scheme?"

ITEM 2 MEGA SUBMISSION:

MEGA submits that claims made under this heading are not accurate. There is a great body of work to be done yet. NREAP should be setting the plan to get this work done. Colleagues in SEAI are saying that "their hands are tied" by the Department and the Minister. MEGA submits that the failure of the support schemes in Ireland is the real reason and that advances in new support schemes in UK has left Irish installation levels too low to support an industry and Irish installers and experts are being sucked away into the UK market.

ITEM 2 of 2 MEGA PROPOSAL

Mega proposes the addition of the following text: *"SEAI is currently in the early phase of rolling out schemes under this heading. A general revamping of the sector with new, and appropriate publicly accessible, support schemes will see acceleration in this area and a stronger build up of reputable installers lists with international equivalencies."*

Consultation by the Department of Communications, Energy & Natural Resources on sub-section 4.2.5 of the NREAP template

Summary:

Section: 4.2.5 (Certification of Installers)

Date of circulation: 30/3/2010

Deadline for feedback: 30/4/2010

Email feedback to: nreap@dcecr.gov.ie

REDG Reps to consult those who they represent on the REDG

4.2.5. Certification of installers (Article 14(3) of Directive 2009/28/EC)

(a) Reference to existing national and/or regional legislation (if any) concerning certification or equivalent qualification schemes for installers according to

Article 14(3) of the Directive 2009/28/EC:

Building Regulation (Part L Amendment) Regulations 2008 are available on the Department of Environment, Heritage and Local Government website:

<http://www.environ.ie/en/DevelopmentandHousing/BuildingStandards/#Building%20Regulations%201997%20-%202009>

In relation to Dwellings, Part L 3(b) requires that "**a reasonable proportion** of the energy consumption to meet the energy performance of the dwellings is provided by renewable energy sources". Section 1.2.7 of the associated **Technical Guidance Document** (TGD L 2008) states that: 'To ensure that works are carried out in a "workmanlike manner", **the design and installation of renewable energy systems to comply with this guidance should be carried out by a person qualified to carry out such work.**'

(b) Responsible body/(ies) for setting up and authorising certification /qualification schemes by 2012 for installers of small-scale biomass boilers and stoves, solar photovoltaic and solar thermal systems, shallow geothermal systems and heat pumps:

The Sustainable Energy Authority of Ireland (SEAI) is actively engaged with the development of training standards for small scale and micro-generation installations. It is SEAI policy that renewable energy equipment funded under SEAI programmes (e.g. Greener Homes) should be installed by competent installers who are certified as having successfully completed the requisite accredited training courses and manufacturers' product training.

Based on the identified need for defined training standards and courses for renewable energy installers, the EU Interreg funded Renewable Energy Installers Academy[2], a collaborative project between Action Renewables and SEAI, was established in 2004. The project developed the template for accredited training for installers of renewable heat and electricity producing technologies. The training standard for heat producing appliances (wood pellet boilers, solar thermal and heat pumps) has been registered in the UK and with FETAC[3] in Ireland. Course material was also developed and courses are being delivered by a number of training providers. Training Standards for solar p-v and wind installers were also developed by the project.

Under the small- and micro-scale generation programme, SEAI has engaged in activities to further the provision of accredited microgeneration training courses in Ireland. In order to meet the need for training for micro-generator installers in the short to medium term, it is proposed to build upon work carried out by SEAI and Action Renewables through the REIA project, and to adapt the courses developed specifically for the regulatory regime in Ireland and to fully meet the training needs of installers.

An ultimate objective is the development of a competency requirement within the National Framework of Qualifications (NFQ) for all installers in this field. SEI has been working in collaboration with FETAC[4], FAS[5], the Commission for Energy Regulation[6], the ETCI[7], Industry Groups and training providers through a Standards Development Group in accordance with FETAC's 'Formation and Organisation of Standards Development Groups.'

The Sustainable Energy Authority of Ireland (SEAI) administers a grant scheme called Greener Homes <http://www.seai.ie/Grants/GreenerHomes/> The Greener Homes Scheme provides assistance to homeowners who intend to purchase a new renewable energy heating system for existing homes. The grants are provided to householders who invest in renewable energy based heating systems under the following categories: solar heating, heat pump and wood chip or pellet boilers.

Installers under the scheme must be registered with SEAI. In order to register with SEAI, they must have appropriate FETAC or City & Guilds qualifications as set out below.

(c) Are such certification schemes / qualifications already in place? If so, please describe.

The Further Education and Training Awards Council (FETAC) and the City and Guilds (C&G)[8] are the awarding bodies of qualifications for renewable energy installers.

FETAC (the Further Education and Training Awards Council) is the national awarding body for further education and training in Ireland. Programmes leading to FETAC awards are at Levels 1 to 6 of the [National Framework of Qualifications](#) The National Framework of Qualifications (NFQ) provides a way to compare qualifications, and to ensure that they are quality assured and recognised at home and abroad.

For an installer to register with SEAI, they must complete the relevant course and obtain the appropriate qualification. The table below outlines the detail of the qualifications for each renewable technology.

TechnologyAwardingDetail

Body	
Heat pumps and Geothermal systems	FETAC Level 6 qualification, Renewable Energy Installer:- Heat pumps

Solar Panels	FETAC	Level 6 qualification, Renewable Energy Installer:- Solar Hot Water
Wood pellet & wood chip boilers and stoves	FETAC	Level 6 qualification, Renewable Energy Installer:- Biomass boilers
Wood gasifiers	FETAC	Level 6 qualification, Renewable Energy Installer:- Biomass boilers and Manufacturer model specific training
Micro Wind Turbines	C&G	Certificate in wind turbine installation*
Photo Voltaic	C&G	Certificate in Solar Photovoltaic Installation*
Hydro		There are no accredited training courses for the installation of hydroelectric generators. A level 6 certificate in Electrical Installation of Micro-Generators will be a requirement for the electrical installation of hydroelectric generators once available.

*FETAC level 6 courses in these areas are currently under development and will supersede the City & Guilds when in place.

FETAC level 6 qualifications for micro generation installers have been finalised as of March 2010 and training programmes will be in place by the end of 2010. Once available, these will supersede the current City & Guilds requirement. The level 6 qualifications are:

- Level 6 Certificate in Electrical Installation of Micro-Generators
- Level 6 Certificate in Implementation of Micro Solar Photovoltaic Systems
- Level 6 Certificate in Implementation of Small Scale Wind Systems

(d) Is information on these schemes publicly available? Are lists of certified or qualified installers published? If so, where? Are other schemes accepted as equivalent to the national/ regional scheme?

SEAI provides information through its renewable energy information office <http://www.seai.ie/Renewables/REIO/>. The SEAI website contains information on installers <http://www.seai.ie/Grants/GreenerHomes/Installers/> including 'How to get listed' and 'installer training.' The Renewable Energy Installer Academy also provides information on installer training <http://www.reinstalleracademy.org/site/home.asp>

Public lists of registered installers for renewable heating technologies and micro-generation are available on the SEAI website at: http://www.seai.ie/Grants/GreenerHomes/Installers/Installers_List/ and http://www.seai.ie/Renewables/Microgeneration/Register_of_Installers/

The Renewable Energy Installers Academy (REIA) currently publish a list of City and Guilds trained installers at <http://www.reiaadmin.org/> Membership of the Renewable Energy Installer Academy^[9] also qualifies as equivalent to an SEAI registered installer.

(e) Summary of existing and planned measures at regional / local levels (where relevant).

This question specifically refers to existing and planned measures at regional / local levels and as part of the consultation those involved at a local, county, city or regional level may wish to input here.



Image (1) Consult

[1] <http://www.cityandguilds.com/9947.html>

[2] <http://www.reinstalleracademy.org/site/home.asp>

[3] www.fetac.ie

[4] www.fetac.ie

[5] www.fas.ie

[6] www.cer.ie

[7] <http://www.etcie.ie/index.php>

[8] <http://www.cityandguilds.com/9947.html>

[9] <http://www.reinstalleracademy.org/site/home.asp>