

3rd Plenary Meeting Concerted Action for the Energy Efficiency Directive

– Identifying obligated businesses in ROI

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Programme Manager Large Business and Energy Audit Scheme implementation

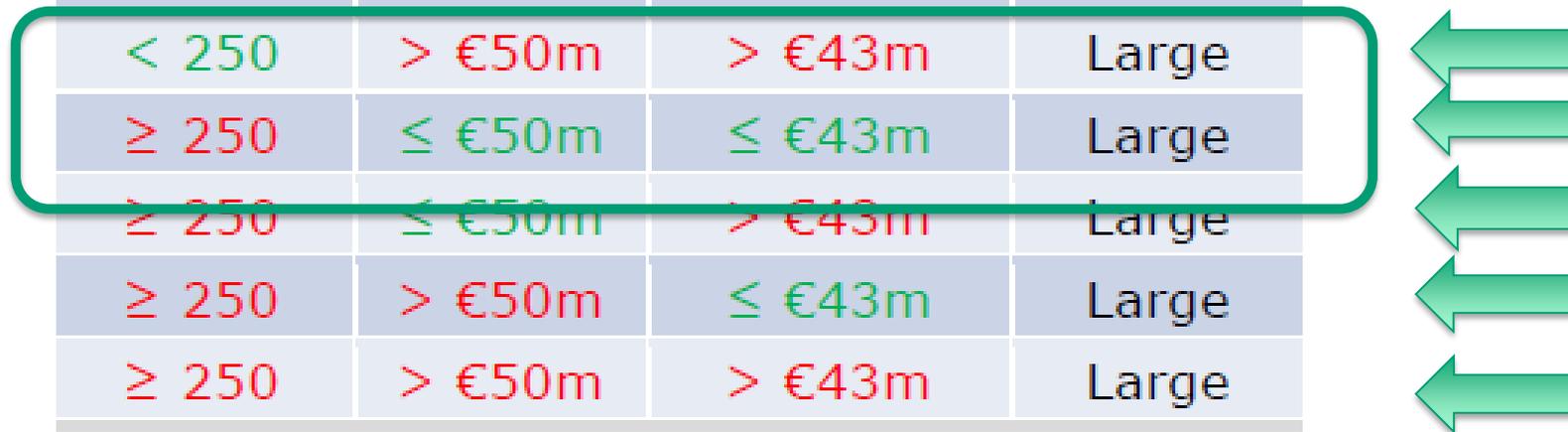


Background

- EED Transposed into Irish law by SI 426 of 2014 and known as the “**Energy Audit Scheme**” (EAS)
- SEAI Implementing body on behalf of Department of Communications, Climate Action and Environment
- Biggest challenge:
 - Who?
 - How many?
 - Who are the non SMEs in Ireland?
 - How to engage?
- Most MS seem to have had similar challenges
- No mandatory reporting of compliance in Ireland
- Corporate enforcement legislation mandates that all large enterprises must meet all legislative requirements
- What we set out to do and what was achieved – the story so far
 - Compliance Checking
 - QA checks
 - The results
- Where to from here.....

What is a Non SME?

Employees	Turnover	Balance Sheet Total	Outcome
< 250	≤ €50m	≤ €43m	SME
< 250	≤ €50m	> €43m	SME
< 250	> €50m	≤ €43m	SME
< 250	> €50m	> €43m	Large
≥ 250	≤ €50m	≤ €43m	Large
≥ 250	≤ €50m	> €43m	Large
≥ 250	> €50m	≤ €43m	Large
≥ 250	> €50m	> €43m	Large



How did we set about identifying obligated organisations

Six phases over last two years:

1. Targeting the Registered Energy Auditors (REAs)
2. Analysis of various data sets available
3. Development of online simple reporting survey tool
4. Letter to all 600 companies identified in Phase 2 above
5. Ongoing review

Next Phase



k25493474 www.fotosearch.com

Phase 1 targeting auditors

- Fastest route
- Updates on audit completion on a quarterly basis - 2016/2017
- Under QA process we then asked for enterprise names so that we could request copies of audit reports
- Results:

Reported Activity – up to 2016/2017								
218	34	55	6	2	0	9	0	324
Audits completed		ISO 50001		ISO 14001		ETS		
Private	Public	Private	Public	Private	Public	Private	Public	Totals

Phase 2 Identification and analysis of various data - relevance

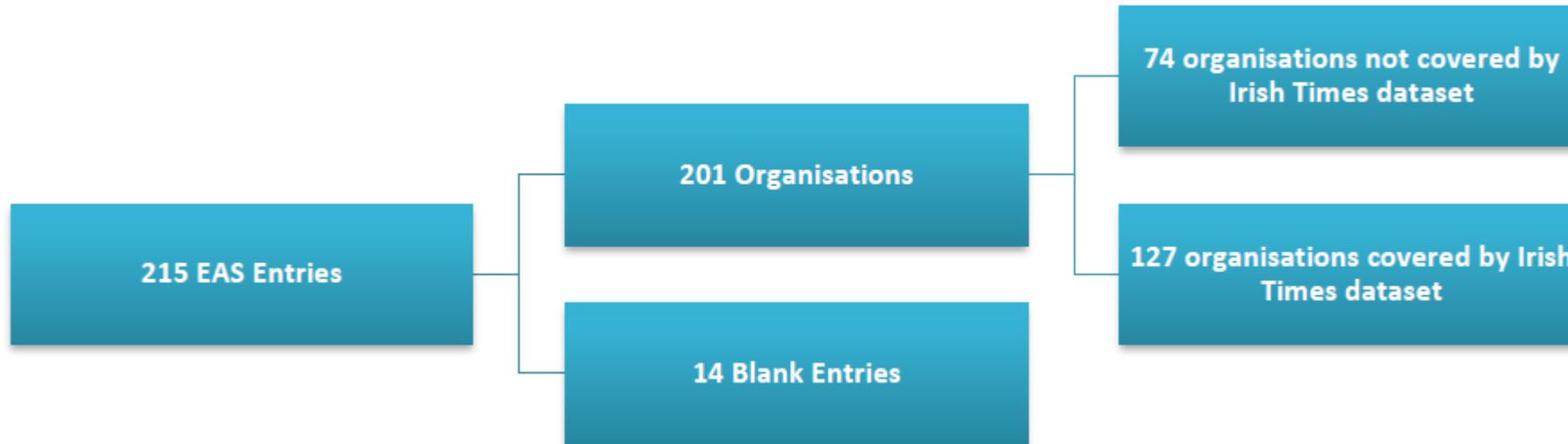
- Irish Times Top 1,000 companies list:
 - staff numbers, **CEO** contact details, sector details, turnover, balance sheet.
- Central Statistics Office (CSO): SEAI has data sharing agreement(s) in place with the CSO.
 - Could CSO provide a list of companies employing >250 staff - limited size/value
- Companies Registration Office (CRO):
 - turnover, balance sheet
 - the Top 1,000 companies list sources its financial data from CRO.
- SME AMA database:
 - 3,500 contact details, employees and energy spend only
- Large Industry Energy Network:
 - contact details, energy consumption for ~200 companies
 - ISO 50001 certification through an agreements programme.
- Register of Energy Auditors (EAS compliance database)
 - 200 names of compliant organisations
- ~~Monitoring & Reporting (M&R) system (Public Sector):~~
 - the M&R system contains energy consumption data for public bodies

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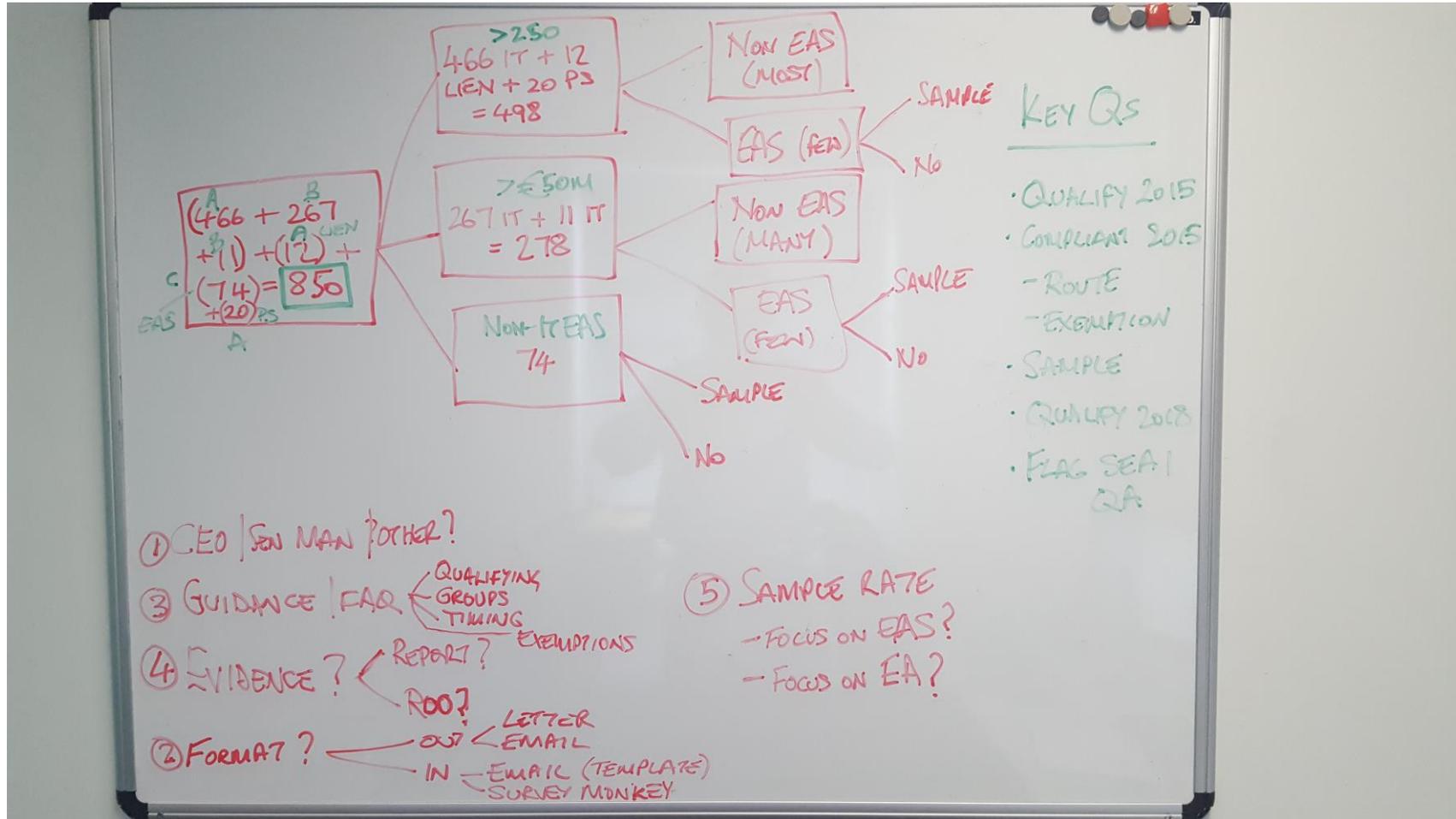
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Phase 2

Figure 3: Breakdown of Energy Audit Scheme (EAS) data



Phase 2 - we did not use a cigarette packet!



Phase 2 Best estimate – up to 800 large enterprises in Ireland obligated

Companies from Irish Times list with >250 employees	466
Companies from Irish Times list with <250 employees but with turnover >€50M	267
Companies from Irish Times list with no employee data but with turnover >€50M	11
LIEN facilities with >250 employees but not on Irish Times list	12
EAS Compliance Tracker but not on Irish Times list	74

Phase 3 Online compliance reporting tool

- <https://www.seai.ie/energy-in-business/energy-auditing/>
- Precursor to development of complete web based reporting platform
 - Simple,
 - Quick to fill up
 - Gathered valuable technical contact information which we largely did not have
- Parts 1, 2, and 3 – collected raw company information
- Parts 4, 5, 6 and 7 company site technical contact details
- 8. Is your enterprise obliged to undertake an energy audit in accordance with the legal requirement?
- 9. Has your enterprise undertaken an energy audit in accordance with the legal requirement?
- 10. Name of Registered Energy Auditor who undertook your energy audit(s)
- 11. Date of most recent audit report/compliance route
- 12. If you wish to provide additional relevant information, please do so here (optional)
- 13. Declaration and signature

Energy Audits and SI 426 Compliance



Phase 5 Review

Phase 4 Letter - Q8: Is your enterprise obliged to undertake an energy audit in accordance with the legal requirement?

- Answered: 421 Skipped: 34

ANSWER CHOICES	RESPONSES
Yes, the obligation applies and our enterprise is not a participant in the EU Emissions Trading Scheme (ETS)	57.01% 240
Yes, the obligation applies and our enterprise is a participant in the EU Emissions Trading Scheme (ETS)	10.21% 43
No – because we have less than 250 employees and our turnover is not greater than €50 million.	14.73% 62
No – because we have less than 250 employees and our balance sheet is not greater than ≤€43 million.	18.05% 76
If (b) or (c), skip to item 12 and sign the relevant declaration.	0.00% 0
TOTAL	421

Phase 4 Q10: Has your enterprise undertaken an energy audit in accordance with the legal requirement?

- Answered: 269 Skipped: 186

ANSWER CHOICES	RESPONSES	
Yes – by undertaking standalone audit(s).	29.37%	79
Yes – via a certified energy or environmental management system.	25.65%	69
No, but we are in the process of arranging for such an audit to be carried out.	44.98%	121
TOTAL		269

Overall Summary Observations

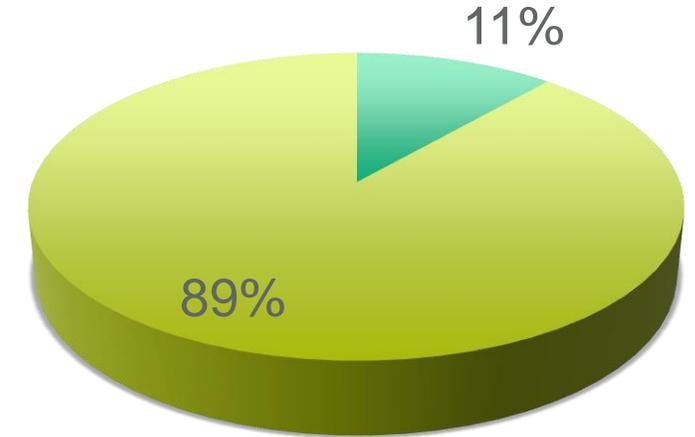
- Numbers compliant
 - 220 names from auditors (who were not included in mail shot)
 - 150 Compliant on database
 - 80 other ~ ISO 50001 certified in LIEN (not included in mail shot)
 - ETS ~ 100 sites majority have ISO 50001 certification most in LIEN
- 500 compliant
- Compliance rate of over 80%
- Plus 120 in process
- Indicates up to 600 businesses in ROI obligated

- SEAI have committed more resources
- Key message is if you are not compliant then you better
- IPPC and ETS, public reporting on compliance is mandatory so why not for EAS compliance

- Registered Energy auditors – numbers increasing
- More promotion by representative bodies and associations that policing is happening

QA checks – Audit Quality Review

- 1st Round Registered Energy Auditor (REA) submitted audits on request
- covering a range of sectors and sizes and accounted for over 200 audits between them
- Audit criteria review demonstrated approx. 90% full compliance with Annex VI requirements!!
- Compliance checks demonstrated approx.
 - 65% using traditional energy audit
 - 30% using ISO 50001
 - 5% using ISO 140001



Phase 5 Where to next?

- Developing new strategy and guidance
 - Inform process going forward including DCCAE
 - Addressing information deficit for large enterprises
 - Improved guidance and audit guidance aligned with Annex VI
 - Updates to guidance to include 85% delivered energy and ETS included
 - Market engagement, promotion and stimulating action
 - QA
 - Further sampling and review
 - Audit report template
 - Market engagement and feedback
 - Compliance reporting
 - Ongoing database development
 - Reporting to include list of solutions identified
 - Review of voluntary and regulatory reporting schemes to meet requirements can these be aligned with EAS
 - Minimise reporting burden on large enterprises (hidden costs)
 - LIEN, IPPC, ETS, ISO Certification
 - Grouped enterprises and relates again to definition:
 - Irl it's "autonomous" or at the "legal entity level"
 - Other states its grouped or linked, this gives another MS implementing body rights to look for audit of business in Irl
 - More information
 - SME programme, new focus on SMEs – how to engage, how to mobilise
1. EPA IPPC reporting on an annual basis
 2. Origin Green annual report. This is for food but there are other reports
 3. SEAI LIEN questionnaire
 4. CSO annual energy usage
 5. EUETS Scheme report
 6. SI:426 audit report every 4 years
 7. Maybe the ISO50001 management review and reporting to auditors

Discussion Topics

- QA – GUIDELINES - Minimum requirements Annex VI particularly with regard to ISO exemptions and certification may not address all six elements – what work has been undertaken with certification bodies in Member States (MS)?
- What types of voluntary and regulatory reporting schemes meet requirements?
 - What are boundaries in terms of Annex VI requirements
- Grouped enterprises and relates again to definition:
 - In ROI it's “autonomous” or at the “legal entity level”
 - Other states its grouped or linked, this gives another MS implementing body rights to look for audit of business in ROI
- Harmonisation of auditors credentials, associated issues around auditor certification if done by UK auditor
- Rented buildings
 - Landlord or Tenant – case where both obligated
 - Energy bills, analyses,
- Tools – audit templates
- Most focus on Non- SME but what about SMEs – how to engage?

Thank you for your attention

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