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Welcome - *from Kevin Curtin, Chairperson*

The last 12 months have been very busy for this Association. We have been engaged with SEAI on a number of important developments that impact on the livelihoods & work practices of BER Assessors – details of all these discussions are summarised below.

Over the last number of weeks, we have been discussing better ways of meeting the needs of our Assessor members. In particular, we have hired a part-time Administrator. We are also in the process of building a new website and setting up and managing active social media accounts. You will hear a lot more from BERAA as we go forward!

We are also about to embark on a membership recruitment drive – we would appreciate you help in this regard. The stronger the Association, the stronger our position in negotiating better & more sustainable work environment for Assessors. If current problematic issues are not resolved, we envisage rapidly declining Assessor numbers going forward. We need your help in order to better represent your interests with SEAI & other stakeholders, so that the role of an Assessor is better supported & valued.

We are also in the process of setting up a number of Information Days over the Autumn/Winter months ahead – more details to follow shortly.

We will endeavour to publish newsletter every 6-8 weeks going forward - they will generally be no more than 2 pages. However, as we have not published a newsletter for a considerable time, this newsletter is quite lengthy!

BERAA has a truly outstanding hard-working Committee who are constantly highlighting issues that affect Assessors – I would like to thank them for their tireless efforts.

Kevin Curtin - Chairperson

Our Committee

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Ongoing BERAA / SEAI Review meeting issues.



- ✚ SEAI has agreed to engage in measures to improve communications with Assessors and BERAA.
- ✚ SEAI has agreed to explore options with a view to ensuring compliance with New-Build BERS and also DECS.
- ✚ SEAI has agreed to explore options re BER exams in the context of alternative CPD options.
- ✚ SEAI has agreed to carry out a review of the QADP system; SEAI has further agreed that the language and tone of audit reports needs to be addressed.
- ✚ SEAI has agreed to issue guidance to Assessors on Data Protection and GDPR incl uploading of photographs

Informal meeting at Energy Show -

Following an informal BERAA/SEAI meeting on the sidelines of the Energy Show (28/03/2019), a draft discussion document was sent to SEAI on the following matters:

- 1) Re-branding of the BER service offering
 - a) to facilitate an expanded assessment/advisory role
 - b) to encourage recruitment & retention of Assessors
 - c) to develop a co-ordinated drive between SEAI & Assessors to deliver programs that will achieve the ultimate objective of decarbonising the built environment.
- 2) It was suggested that the terms “BER” & “BER Assessor” should be replaced with terms such as “BEA, (Building Energy Assessment)” & “REA, Registered Energy Advisor”
- 3) It was also suggested that BER Assessors be registered on the following basis, based on competencies confirmed by prior qualifications, training, CPD, etc. For example:
 - a) Level 1: Domestic & Non-Domestic – Existing
 - b) Level 2: Domestic & Non-Domestic – Existing & New-Build
 - c) Level 3: Domestic & Non-Domestic – Existing & New-Build

DEC’s
Energy Auditing Scheme
Monitoring & Reporting

Deep Retrofit Pilot – Design, Retrofit Co-Ordinator, Project Co-Ordinator

- 4) Formal recognition by SEAI of BERAA, with an agreed Memorandum of Understanding between the parties with the objective of developing a horizontal relationship between the parties.

Invitation issued to BERAA to review draft heat pump Technical Bulletin May 2019



BERAA forwarded a detailed list of queries/concerns on May 27th, as follows:

1. The Letter of Engagement needs to be reviewed as a matter of urgency to deal with increased responsibilities, as required in the context of the Technical Advisor role. The efficacy of the “disclaimer” included in the opening sentence of para 3 must be seriously questioned in light of increased responsibilities now being proposed. It must be seriously questionable that our PI Insurers will provide cover in the event of a claim by a home-owner in the event of a poorly performing heat pump installation.
2. It is evident anecdotally that awareness/engagement on the matter of Heating Design responsibilities is quite low in the heating installation industry - this needs to be addressed as a matter of urgency. In default of same, it should not become the responsibility of Assessors to check their design work or installations. In the case of heat pump grant applications, certified design documentation (by competent persons) should be provided to SEAI in support of the grant application. Copies of same, along with certified installation documentation (by competent persons) should be provided to the Assessor prior to completion of assessment & DOW. It is not the responsibility of Assessors to double-check certificates signed-off by others. The documentary evidence requirements would in fact mirror the current situation viz EWI & CWI.
3. One of the impacts of the proposed TB wording is that Assessors will be exposed to penalty points if they mistakenly misinterpret elements of the installation on site (eg type/size of heat emitters); this is clearly inequitable in light of the situation whereby Contractors have their penalty points quashed when errors are remedied.
4. The concept that an Assessor is not responsible for heating design, but is in some way responsible for checking it, is a contradiction in terms.

However, it has now come to our attention that a final version of the BER heat pump Designers sign-off sheet (incl BER tabs) has been circulated to heat pump contractors, but not to BER Assessors. If this is in fact the case, such an action is highly regrettable.

Contact Us

www.berassessors.com

Release of DEAP 4.2.0

- 1) The stop-start nature of the roll-out of DEAP 4.0.2 has been unsatisfactory, to put it mildly. This has been further exacerbated by the entirely inadequate proposals presented for holding DEAP4 workshops. This approach smacks of a total lack of consideration by SEAI for the impacts of DEAP4 on Assessors. While all other stakeholders were given extended timelines for delivery of their relevant part of the DEAP4 service, the time that was afforded to Assessors to educate & familiarise themselves with the new platform was substantially reduced, as evidenced by the original refusal to agree to any delay to the retirement of DEAP3. BERAA canvassed strongly that the DEAP3 retirement date should be extended - SEAI eventually agreed to a minor extension of the deadline to the end of October.

- 2) It is fair to say that overall it would appear that some aspects of DEAP4.0.2 have been reasonably well received by Assessors – this is hardly surprising as the new platform has largely morphed into being a quasi-DEAP3 in many respects, largely following strong representations made by BERAA. However, significant issues remain:
 - a) The failure to eliminate “tripping hazards” for Assessors within the software. For example:
 - i) The secondary heating input is far less visible than heretofore. Therefore, it is extremely easy to input a flue, while failing to input a secondary heater, with obvious audit consequences for an Assessor.
 - ii) If you wish to input multiple wall-vents, you have to first enter 1 no. & later revise to the correct number!
 - b) The failure to include heat pumps in the HARP database, as promised, is a highly regrettable development.
 - c) The failure to present a consolidated DEAP Manual
 - d) The lack of capability to import DEAP3 files
 - e) The nonsensical requirement to sequentially upload evidence in multiple categories, with obvious negative workflow impacts. BERAA questions the legislative requirement to upload photographic or other evidence? BERAA is also extremely concerned that no guidelines re same have been issued in the context of GDPR restrictions. Who will take responsibility for GDPR breaches? Does the obvious risk of GDPR non-compliance risk undermine our PI Insurers interpretation of BER Assessor activities & obligations? These are all valid questions that need to be addressed before evidence uploading, as planned, is pursued. BERAA has strongly lobbied that the requirement to upload evidence should be discontinued pending resolution of the above matters.

- f) How will Assessors, who do not have access to high-speed broadband, be accommodated?
- 3) Other DEAP 4.0.2 Issues
- a) **Roll-out of DEAP4.0.2 will have obvious time & cost implications for both Assessors and Clients – BERAA is currently in the process of evaluating this. The upcoming roll-out of a new Advisory Report format will have similar implications. BERAA will be providing further detail on these matters in the near term.**
 - b) The Letter of Engagement needs to be reviewed as a matter of absolute urgency in light of GDPR. In this writer’s opinion, it is not permissible to share sensitive information online relating to the Homeowner and/or Assessor.
 - c) Despite previous requests from BERAA, Helpdesk learnings are not being shared. The obvious conclusion now is that these learnings are being withheld due to the commercial value of this acquired intelligence.
 - ~ **BERAA has submitted to SEAI that a full review into DEAP4 be carried immediately on conclusion of a 3-month trial period. BERAA requests full participation in such a review.**

SBEMie

BERAA notes the release of SBEM v5.5 on September 23rd last – it would appear that no advance email was issued. In the opinion of BERAA, a notice on NAS is not adequate for a matter of such importance to Assessors. **SEAI has since confirmed to BERAA that all such changes in the future will be notified to Assessors by email, rather than on NAS only.**

Furthermore, SBEM v3.5 was retired simultaneously, without any overlapping period for familiarisation. As you are aware, workshops on SBEMie were held as far back as January last. BERAA raised this matter with SEAI personnel on the day of the South Dublin DEAP4 workshop on September 11th last. Due to the significant passage of time, it requested that relevant training materials, incl case studies, would be circulated prior to release date – though promised on the day, this did not happen. In the opinion of BERAA, there have been significant changes in SBEM procedures and guidance in the updated survey guide which present multiple tripping hazards - these changes have not been summarised or highlighted in text nor clearly explained with regards changes to procedures. The guidance is ambiguous at best and could also be subjective.

QADP

BERAA members have been expressing dissatisfaction with the inconsistent & penal manner in which audits are being conducted.

Furthermore, disclosure from SEAI is required on oversight of the auditing regime & appeals process. BERAA has requested SEAI to facilitate a joint meeting with SEAI & the audit service providers at an early date. SEAI has previously committed to an early review of QADP – we submit that BERAA should be represented on the review panel.

Exams

It was stated at a recent DEAP4 workshop that there would be 5 no. additional exam questions re NZEB, with no additional time afforded. This is patently unfair. BERAA has raised this issue with SEAI.

SEAI price signals re BER's

BERAA has requested SEAI removes all BER price signals from their information platforms. Historically, interested parties have been accommodative of the “cheap as chips” perception of building energy ratings. BERAA has submitted to SEAI that such a race to the bottom does a great disservice to the rationale behind the relevant EPBD requirement for energy ratings. BER's are intended to be drivers towards an urgent energy transition, not just an imperceptible link in a property transaction. The Assessor cohort needs to attract energy professionals to deliver energy ratings services that deliver real value to property-owners - we trust that SEAI are like-minded. Much more needs to be done!

Energy Show 2020

BERAA has requested engagement with SEAI at an early date towards facilitation of a BERAA Workshop at Energy Show 2020 to inform, educate & debate areas of interest to Assessors & relevant BER stakeholders.



BER ASSESSORS IRELAND

Association of registered BER and Energy Related Assessors in Ireland