

**Association européenne
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Associazione Europea
Installatori Impianti Elettrici
*Asociación Europea de Impresarios
de Instalaciones Eléctricas*



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AIE considerations on the Proposal for a Directive on the promotion of the use of energy from renewable sources –

Certification schemes for installers

The European Association of Electrical Contractors – AIE – comprises 20 national associations representing 175.000 contractors, a workforce of 900.000 and a turnover of Euro 60 billion.

Electrical contractors design, install and maintain intelligent systems for all kinds of industrial, commercial and domestic purposes alongside the well-known power and lighting applications. They know how to deal with telecommunications, highway and street lighting, energy management systems and renewable energy systems, access, fire and security control equipment, lightning protection systems, advertising and identification signs and emergency power generating systems.

For several years, the AIE has closely monitored the EU Energy Policy and supports its overall objectives. However the AIE is most concerned about the European Commission's proposal to have mandatory **Certification schemes for installers** in the proposal for a Directive on the promotion of the use of energy from renewable sources and **their mutual recognition by Member States** (article 13).

With the following considerations, the AIE is willing to contribute and clarify its concerns to the European Commission and European Parliament.

On the principle:

- **The AIE generally recognises that upgrading of the skills of the installers is necessary for new technologies, however it doesn't agree with the fact that this should necessarily be linked with a specific certification scheme.**

The electrical industry doesn't want to see its sector fragmented, as most electrical contractors carry out many types of electrical installations, photovoltaic systems included.

The increasing general trend to request certifications will result in the need for most electrical contractors to be certified not only for photovoltaic systems or heat pumps but equally for security systems, control systems, telecommunication systems, energy management systems, etc.

It is easily understandable that all these types of certifications would heavily undermine the sector's competitiveness, by increasing costs and adding administrative burden. Furthermore, additional certification schemes compete with existing and functioning training and apprenticeship systems.

Most if not all types of Renewable Energy sources belong to the existing electrical and mechanical building services sectors. Many electrical contractors have always installed power generators or standby generators as part of their main core business. Renewable energy sources are only another type of generator that electrical contractors as qualified technicians, can connect as any other type of generator.

Existing electrical contractors already have the main core installation skills to install these new renewable energy technologies, albeit, they will need some up skilling and training on these technologies as well as for other technologies depending on their focus of business.

Content of the training:

First of all the AIE doesn't understand why article 13 of the Directive is mentioning small-scale systems, there where in Annex IV nothing on the scale of systems is specified?

Moreover, Article 13, 3 of the draft Directive talks about certification schemes whereas Annex 4 is in fact describing a qualification for individuals as being the same thing, they are not.

Annex 4, 4 - 5 - 8 describes a very ambitious skill level. The installer (individual) must be multi-competent (electrical, roofing, plumbing skills) excluding hereby a number of existing installers; only the ones having 100% of their activities in renewable systems can invest for that. Today the photovoltaic systems are installed by multi-skilled companies or joint ventures (cooperation) between roofers and electrical contractors.

Electrical installers are not plumbers and plumbers are no electricians. Plumbers make a different kind of installation with some special needs (isolation) that may need a specific certificate from the manufacturer. It's different for the electrical installer, because all installations require an electrical isolation, in conformity with a great number of technical standards and regulations.

Moreover, it can be even more complex as the installation on a roof of Photovoltaic modules can equally require the knowledge of a structural engineer. The weight of photovoltaic modules installed on an existing roof with consequences on the building structure might indeed require in some cases also the intervention of a structural engineer.

Mutual recognition of qualifications:

The recognition of qualifications as mentioned in Article 13 is unrealistic because it supposes in first instance a harmonisation of the technical standards in the electrical field which differ in each Member States and sometimes even in the same Member State from region to region. It would moreover require a convergence of skills throughout Europe.

It is therefore not possible to have a qualification process defined by each Member State because we can anticipate the fact that the level from one country to another will be different, leading to unfair competition between Member States.

Up-skilling of installers:

The AIE agrees that training courses can help the installer to understand the differences with traditional systems. But there is no need for a specific mandatory certification, as all installers already have a high experience installing generators and as mentioned previously, photovoltaic systems are the same.

AIE recommendations:

1) The electrical industry recognises the up-skilling training modules to be made available for **existing operatives**, and the same to be delivered as part of the training to **apprentices and trainee engineers** but does not want multiplying standalone certification schemes for different parts of electrical services.

Instead of this complicated and unrealistic system, it could be simpler to ask the Member States to ensure that in the existing qualification of an electrician, an optional module would be added on renewable energies, as it is yet the case in some Member States (Austria, Germany, Switzerland and Luxemburg) without resulting in a specific, additional certification.

In Germany for example, these advanced training modules are often aligned on the vocational training as an electronic technician. Equally the standard vocational training offers the opportunity to specialize in Energy- and building Automation which includes special training in the use of regenerative sources.

This training module can then indeed include the specifications regarding the tilt, the orientation and dimensioning.

2) Equally the AIE proposes to have good **information and co-operation** from the manufacturers and suppliers regarding new technologies in general and specifically in the field of renewable energy systems.

As mentioned previously, the AIE would be very pleased to give a more in-depth contribution to the above mentioned considerations.

Brussels, May 2008.