



Secretary General,
European Commission,
Rue de la Loi 200,
B-1049 Brussels,
Belgium.

23 May 2012

**Re: Directive 2010/31/EU of the European Parliament and of the
Council on the energy performance of buildings (recast)**

Dear Secretary General,

I have been asked by my authorities to refer to the provisions of Article 15 of Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings (recast) concerning the inspection of air conditioning systems.

Under Articles 15(1) to 15(3) of Directive 2010/31/EU, Member States are required to set out the necessary measures to establish a regular inspection of the accessible parts of air conditioning systems of an effective rated output of more than 12 kW. These inspections shall include assessments of air-conditioning efficiency and sizing compared to the cooling requirements of the buildings concerned.

Member States may set different inspection frequencies depending on the type and effective rated output of the air conditioning systems, whilst taking into account the costs of the inspection of such air conditioning systems and the estimated energy cost savings that may result from the inspection regime. In as far as is economically and technically feasible, inspections should be carried out in accordance with the inspection of heating systems and other technical systems as required by other Community legislation.

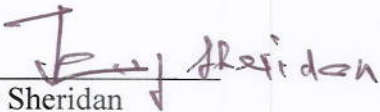
Article 15(4) of Directive 2010/31/EU provides an alternative approach to the above requirements and enables Member States to opt to take measures to ensure the provision of advice to users on the replacement of air conditioning systems or on other modifications to the air conditioning system which may include inspections to assess the efficiency and appropriate size of the air conditioning system. The overall impact of the alternative approach must be equivalent to that arising from the provisions set out in Articles 15(1) to 15(3) respectively.

Where Member States opt to avail of the alternative approach set out in Article 15(4) of Directive 2010/31/EU, they shall submit to the Commission a report on the equivalence

of those measures to the measures referred to in Articles 15(1) to 15(3) respectively. Member States shall submit these reports to the Commission every three years.

My authorities wish to formally notify the Commission that Ireland intends to avail of alternative approach provided for under Article 15(4) of Directive 2010/31/EU and, in this context, encloses a report on the equivalence measures proposed for the three-year period 30 June 2011 to 30 June 2014.

Yours sincerely,


Terry Sheridan
Environment Attaché