GAI RESPONSE TO THE CONSTRUCTION PRODUCTS REFORM GREEN PAPER

This document summarises the GAI's response to the Grenfell Tower Inquiry Phase 2 Report and the UK Government's subsequent Construction Products Reform Green Paper.

The GAI's input reflects its Technical Committee's analysis, member feedback, and collaboration with wider industry groups and Government consultations.

1 INTRODUCTION

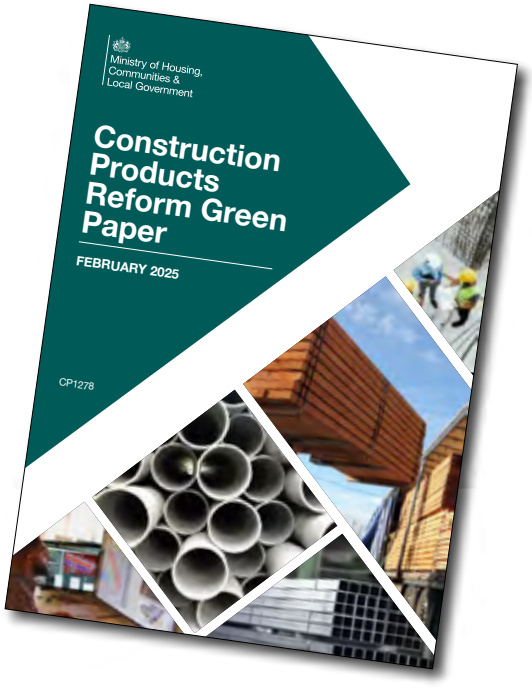
The Grenfell Tower Inquiry Phase 2 Report stated the following. "It is not possible to identify any single cause of the tragedy; many different acts and omissions combined to bring about the Grenfell Tower fire, although some were more significant than others."

The Inquiry presented detailed evidence of a construction products regulatory regime that failed to keep residents safe, and which allowed manufacturers to engage in dishonest and manipulative practices with no recourse. The Inquiry further evidenced the persistent, systemic problems within the construction products sector identified in the Hackitt Review the Morrell-Day Review.

The UK government has now formally responded to Sir Martin Moore-Bick's Phase 2 Report which drew the Grenfell Inquiry to a close. The Grenfell Phase 2 Report is an in depth review that gives clear evidence regarding the events leading to and following the Grenfell Tower Fire. The Inquiry made 58 recommendations, of which 37 were directed at the Government and 21 were directed at other bodies and institutions. Of these recommendations, 49 have been accepted in full and nine in principle.

The most relevant detail within the Government response is the publication of the Construction Products Reform Green Paper. This is a hugely detailed document which sets out their proposals for system-wide reform of the construction products sector, the regulatory regime that governs it and the institutions that must fulfil their responsibilities in assuring safe products that can be safely used. These proposals address the systemic failures that contributed to the tragedy at Grenfell Tower and set the path to fulfilling government ambition to ensure that construction products are both safe and used safely now and in the coming decades.

The GAI has submitted its response to the Green Paper. The comments, detailed below by chapter, reflect input from the GAI Technical Committee, direct responses from GAI members, and consultation with other industry bodies such as the Construction Products Association and the Construction Leadership Council. They also reflect participation in UK Government round table discussions on this subject.



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AN OVERVIEW OF THE PROBLEMS WITHIN THE CONSTRUCTION PRODUCTS SECTOR AND REGULATORY REGIME

Question 1 - Do you agree with the problem definition as outlined in chapter 2 of the Green Paper (i.e. "The whole system needs reform.") [Yes/ No]. Please explain your answer.

Yes. Without question reform is needed within the construction product sector.

It is correct that standards are often unrelated to safety as the European Construction Products Regulation was intended to remove barriers to trade throughout the European Market. However, whilst the current system of creation of standards can take some years it is a robust system which is based on consensus and the collective wisdom of industry experts, many of whom are participating on a voluntary basis.

The GAI is pleased to play a pivotal role in the creation and revision of many standards in the field of both architectural ironmongery and doors at ISO, CEN and BSI level. The majority of products within the ironmongery industry falls within scope of harmonised/designated standards. This includes hinges (BS EN 1935), controlled door closing devices (BS EN 1154), Electrically Powered Hold-Open Devices (BS EN 1155): Door Coordinator Devices (BS EN 1158), Panic exit devices (BS EN 1125) and Emergency Exit Devices (BS EN 179). Therefore the appropriate version of the Construction Products Regulation applies in both Europe and the United Kingdom to these products . Extending the number of products to fall within scope of harmonised/designated standards would be welcomed in our industry but there is a concern over the amount of resource required for this to happen.

GAI is in agreement that information on safe and appropriate use of products is often inadequate across the construction products sector and supports schemes which help promote better practice in this area.

We also agree that enforcement is an area which requires more robust work and that "…action is needed to ensure sufficient enforcement powers are available to the national regulator and applied effectively to ensure safe products." GAI is currently working closely with the OPSS to assist with providing clear guidance for the construction products industry.

GAI supports reform of the system but values retaining the robustness of consensus-based standard development.

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Question 2 - Are there particular functions that the sector does well that should be protected or encouraged? [Yes/No]. Please explain your answer.

Yes. The following are examples of good practice within the construction products industry and therefore relevant to the ironmongery and door industry:

- Industry Trade Associations who provide guidance and best practice documents. An excellent example of these documents is the "Code of Practice for hardware for fire and escape doors" (www.firecode.org.uk) This was co-written by the Guild of Architectural Ironmongers and the DHF and is referred to in British Standards such as BS 8214, BS 9991 and BS 9999 as well as statutory guidance documents to the Building Regulations across UK and Ireland such as Approved Document B. Further examples include GAI Specifiers Guides www.gai.org.uk/specifier and GAI End User Guides www.gai.org.uk/user.
- Third party certification schemes. These include ironmongery and fire doors with schemes run by companies such as BM Trada, Kiwa IFC, Warringtonfire (e.g. Certifire, Certisecure), UL Solutions and BSI (Kitemark). These schemes encompass key areas including fire, security, installation and environmental.
- Ongoing audit testing of hardware and fire doors relating to CE and UKCA Marking where applicable.
- Factory Production Control (FPC) for CE and UKCA marking for products such as hardware and fire doors. This covers the procedures which are put in place to allow a manufacturer to maintain consistency in quality and to keep records of non-conforming products, processes or materials, in order to make improvements.
- The Code for Construction Product information (CCPI) exists to raise standards in construction product information and marketing and drive positive culture change in the manufacturing and supply sector in relation to product information and marketing.
- Companies providing products which improve product traceability within the construction product industry through unique digital identification. These include BSI Identify and FireDNA.

3

OUR VISION FOR REFORM

Question 3 - What, if any, other potential overlapping rules, regulations or guidance should we consider when designing the construction products regulatory regime?

Other potential Statutory guidance documents rules, regulations or guidance to be considered include statutory guidance documents to the Building Regulations (such as Approved Document B) and existing standards (such as BS 9991, BS9999). Also existing best practice guidance documents written by industry stakeholders (such as Construction Products Association, Passive Fire Protection Forum, Fire Sector Federation and the GAI).

Careful consideration should be given that any new regulation does not conflict with existing guidance as this does already occur in industry, for example Approved Document B and Approved Document M do conflict with each other. Ensuring issues such as accessibility, fire safety and security co-exist is vital. Also ensuring that the statutory guidance documents align closely with British Standards which can be difficult. Examples include BS 9991 and Approved Document B which both relate to fire safety.

4 INTERACTION WITH THE UNITED KINGDOM INTERNAL MARKET AND THE EUROPEAN UNION

Question 4 - Do you agree that the UK should adopt a definition that is consistent with the revised EU-CPR, for construction products in the UK regulatory regime? [Yes/No]. Please explain your answer.

Yes. Whilst there is a necessity for UK to ensure that it retains control over construction product reform, having two different definitions and sets of standards in each jurisdiction could cause problems. Many construction product manufacturers in UK sell in to Europe and vice versa thus a different set of standards would cause many issues. Also, there would be implications for Northern Ireland working to a different set of rules (i.e. European regulation) to the remainder of the UK due to the Windsor Framework and its inclusion in the single European Market. This could mean potential divergence within standards and regulation within the United Kingdom itself.

While manufacturers would welcome closer alignment with the EU regulatory system they do raise the issue that there needs to be a level playing field for UK Conformity Assessment Bodies (CABs) and Technical Assessment Bodies (TABs). This would require a mutual recognition agreement needing to be in place to allow certification and testing by UK Bodies being equally accepted in the UK and EU and vice versa with their European equivalents.

5

SCOPE AND DEFINITIONS OF REFORM

Question 5 - Is there a need to further clarify the regulatory approach to systems of products and or Modern Methods of Construction [Yes/ No]. Please explain your answer and propose any additional clarifications.

Yes. Section 5.11 and clarity on accountability for safety being made clear is also welcomed, particularly around systems. The door hardware and fire door industry work together closely to help create systems for fire door sets and assemblies and whilst product standards such as EN 14351-1, EN 14351-2 and BS 8214 do exist, there are issues in relation to poor installation of fire doors which negates all the good work done in manufacture and specification.

Better regulatory requirements for competence in relation to fire doors would be of considerable benefit to the industry. Third party certification schemes for installation of fire doors are available but are not mandatory. These products are life safety products and not just everyday commodity items.

6 PRODUCT REQUIREMENTS – A REGULATORY APPROACH BASED ON SAFETY RISK

Question 6 - Does the proposed definition of 'economic operator' capture all of those who are responsible for ensuring that products are safe when they are placed on the market? [Yes/No]. Please explain your answer.

No. Whilst the list of economic operators listed is comprehensive it does not include product specifiers. This is of great significance in the door and ironmongery industry as we have a great influence on product selection and specification within the construction industry. Architectural Ironmongers possess the ability to specify products such as door hardware and access control which are critical to the safety of a building, particularly in relation to fire and escape doors. They can also demonstrate their competency through their Registered Professional status which demonstrates that their learning is up to date each year through a process of ongoing CPD www.gai.org.uk/cpd.

There is also no mention of those who are involved in the design of projects or the specification of products, all of whom have a responsibility for safety. The definition of designer in Construction (Design and Management) Regulations 2015 would provide a useful list of all who would have involvement with products and therefore should also be listed. Designers are defined in the 2015 CDM Regulations as "… an organisation or individual, who prepares or modifies a design for a construction project (including the design of temporary works); or arranges for, or instruct someone else to do so.' Designs include drawings, design details, specifications, bills of quantity and calculations. Designers include architects, engineers, quantity surveyors, interior designers, surveyors, technicians or anyone who specifies or alters a design. This can include contractors, principal contractors, specialist contractors, and commercial clients who become actively involved in design. It also includes those who select products for use in construction, and if a product is purpose-built, those who prepare the specification and manufacturers if they develop a detailed design."

Question 7 - Would the approach detailed above enable a proportionate approach to regulating the safety of products not covered by a designated standard or subject to a technical assessment? [Yes/No]. What other approaches could be taken, drawing on evidence from EU Member States where relevant.

Yes. Section 6.6 provides an excellent framework for bringing products which are unregulated into the regulatory regime. An area of particular agreement is that manufacturers should take the necessary action to understand, and eliminate or control, any safety risk connected to the intended use and the normal or reasonably foreseeable conditions of use of their construction product before it is supplied or placed on the market.

There is no mention of independent third party certification schemes which also have a role to play in the General Safety Requirements.

It should also be noted that "products critical to safe construction" may well incorporate systems which are critical to safe construction which would include fire doors.

6 (CONT'D)

Question 8 - What are the implications, if any, that could arise from introducing obligations on importers and distributors to check product information and associated responsibility for the storage and transportation of construction products under a general safety requirement? If there are any implications how could they be mitigated and managed?

Other than a potential slow down in supply of products as a result of the extra obligations, anything which helps ensure product information is verified is welcome.

Question 9 - What role should technical assessment play in a future regime? [NB Government means EU Technical Assessment documents.]

Technical assessments have already been used in the hardware industry, most notably for multi axis hinges whereby these products can be CE marked through a European Assessment Document. These EADs have been of use to allow conformity marking for products when harmonised standards were at a standstill in CEN. We are in agreement that they still have a part to play.

Question 10 - What requirements should apply to products and systems that are critical to safe construction?

It would firstly be necessary to identify the products or systems that are critical to safe construction, noting that many of these would be outside the scope of harmonised/designated standards.

There is also a necessity for definition of "products critical to safe construction".

It should also be noted that "products critical to safe construction" may well incorporate systems which are critical to safe construction (for example fire doors). A requirement for risk assessments could be applied to products within systems.

Question 11 - What types of requirements could be placed on those responsible for building works to enable them to meet safety obligations in relation to the specification, selection and installation of construction products?

The correct and competent specification of ironmongery is vital for a building, this is in terms of not only its safety but also its security, sustainability, environmental impact and its accessibility. Many specifications are changed at the last minute in the name of "value engineering" which can result in a reduction of levels of performance in doors and hardware across an entire project. GAI would be keen to see some form of mandatory change control document which details all changes in specification as well as the reasoning behind it. As stated earlier there are legal duties under the CDM Regulations (2015) for designers. These include those who not only specify a product but also make decisions on the selection of alternative products. We feel there is not enough emphasis on the controls on de-specification of product therefore more stringent control is required.

6 (CONT'D)

As previously mentioned in our answer to question 5, installation of product is of massive importance in our industry, particularly in respect of fire doors. A more stringent requirement on installation is needed, as should also be the case for fire door inspectors. Demonstration of competency in both these areas is of utmost importance, with greater emphasis on third party certification required.

A register for fire door installers and fire door inspectors would also be worth considering. This could be similar to the "Gas Safe Register" where all gas businesses and their engineers must be on the Gas Safe Register to carry out gas work legally. Fire doors are life safety devices as they play a huge part in the passive fire protection of a building.

Question 12 - What, if any, significant implications are there from implementing safety requirements for the specification, selection and installation of construction products and how could they be managed?

Implementing higher standards including demonstration of competency and greater emphasis on third party certification for installation and inspection in fire doors in particular could result in increased costs in this area. This however would be worth it as it would help to increase higher quality standards and help avoid the "race to the bottom culture" which was identified by Dame Judith Hackitt in the Independent Review of Building Regulations and Fire Safety.

Question 14 - Do you agree that minimum requirements for third-party certification should be required? [Yes/No]. Please explain your answer.

Yes. It is important for these schemes to act as a benchmark of trusted compliance. Manufacturers selecting which schemes to adopt should be doing so based upon a level field of attributes which serve transparency and compliance monitoring / auditing. Minimum requirements would ensure this and possibly introduce competitiveness within the sector based upon performance and credibility.

Minimum requirements for third party certification should be based on existing frameworks such as the ISO 17000 series of standards which focus on conformity assessment.

Question 15 - Should upfront approval from the national regulator be required for third-party certification schemes? [Yes/No]. Please explain your answer.

Yes. This would help provide oversight and therefore ensure further credibility of these schemes.

Question 16 - What could help increase the take-up of these types of schemes?

Legislation via the UK Construction product Regulation or through statutory guidance documents such as the Approved Documents and equivalents throughout UK.

6 (CONT'D)

Question 17 - What information would support you to choose the best product that will be safe in its intended use and its normal or reasonably foreseeable conditions of use?

Verification of a company's marketing information by a third party such as CCPI can provide comfort that their product information is reliable and trustworthy. The five tests advocated by CCPI are that information is: Clear, Accurate, Up-to-date, Accessible, and Unambiguous.

Question 18 - Are you aware of instances where current marketing legislation has been insufficient to take action against misleading marketing practices? [Yes/No]. If yes, please provide details.

No.

Question 19 - How is industry addressing gaps in construction product installation competence?

The use of third party schemes for installation of products such as fire doors is one example of how gaps in installation competence can be remedied. As stated earlier this should be heavily backed by government.

The Industry Competence Steering Group (ICSG) are a strong voice in increasing levels of competence across many areas within the construction sector. Sector Led Group 10 is specifically involved in creation of competence frameworks on installation and maintenance.

Question 20 - What more can be done to support the improvement of competence in the construction products industry?

An uptake in, and promotion of industry training schemes from Trade Associations such as the GAI, ASFP or ADSA which focus on increasing both skills and knowledge in their area of expertise would also help drive up competence.

It is also essential that knowledge is kept up to date through Continuing Professional Development. Looking to create mandatory requirements for CPD in all disciplines related to fire safety – as is the case with RIBA - would make a significant impact.

A new BS 8670 2 standard "Core criteria for construction product competence" is currently being drafted in BSI (GAI is currently acting in capacity of vice chair of the drafting panel). This standard will provide a methodology for those involved in construction products to create their own competence frameworks. The promotion of this new standard as well as a series of new outputs created by ICSG Sector Led Group 5 for competence in Construction Product Manufacturing (a group which is co-chaired by GAI) will assist in driving up levels of competency in this area.

7

CLEAR ACCESSIBLE INFORMATION

Question 21 - What test information is necessary to facilitate appropriate selection, safe installation, and to demonstrate that claims made can be evidenced?

The commercial risk of publishing test information data is a major concern for manufacturers in general and GAI members in particular, and industry questions the ability of a non-specialist to decipher and review the test reports. Whilst many ask to view test reports and assessments, very few have the experience to fully understand how to review the information contained therein with any degree of reliability. It is the case that all test and certification data is currently available to the regulatory body should they ask for it, therefore wider publication of test data is something which industry is uncomfortable with.

Question 22 - What, if any, significant constraints might prevent disclosure of all test data and how could they be mitigated?

There is a legal issue in relation to this as a part of a Conformity Assessment Body's legally enforceable requirements to EN ISO/IEC 17065 standard is confidentiality, which prevents the making available of client information (e.g. test data) without permission.

Also, many manufacturers are concerned at releasing test data for fear of competitors seeing and using information which is their own Intellectual Property (IP).

A potential compromise could be an abstract or summary of test reports reviewed and approved by an accredited third party for public consumption.

Question 23 - What information would it be useful to include in a construction library and who would it benefit?

Industry thinks a construction library needs further thought as this has a number of practical difficulties, especially if we are to limit the burden of duplication on manufacturers. Given that there are the options of CE/UKCA marking and third-party certification schemes that are auditing product performance claims already, the existence of multiple access points to supportive data needs careful and practical consideration.

Industry also has concerns over the cost of maintaining such a library, and who would be responsible for this. Drawing all the information required for such a library would require extra technical and administrative resource across industry which could drive up costs.

That said, if the construction library does go ahead, some of the following information would be of use:

- Product Data Sheets
- Operation & Maintenance manuals
- Fitting instructions
- Maintenance information
- Environmental Product Declarations (EPDs)
- Relevant certification e.g. CE/ UKCA/ third part certification
- Manufacturer/merchant contact details.
- Dimensional drawings
- Product images

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Question 24 - What benefits or challenges could digital labelling or EU Digital Product Passports bring?

Digital labelling would be of great use to industry as it would ensure that relevant product information is available to all in the supply chain, from supply to install through to installation, maintenance and potential disposal of the asset. This would provide a comprehensive, digital record of building information that ensures building safety throughout its life-cycle.

If the government wishes to maintain close alignment with EU in relation to product regulation then Digital Product Passports will become mandatory for all products falling within scope of harmonised /designated standards. This does mean that all products outside the scope of these standards would also need to have a mandatory requirement which may require some form of legislation. This would be a huge ask as, according to the Morrell Day report only one third of construction products fall within the scope of harmonised /designated standards.

Digital labelling is therefore seen as worthwhile although concerns do abide over how it would appear on the products, and the inherent cost on tooling and labelling which industry would need to bear once more.

Question 25 - Are the proposals we have outlined to improve access to product information enough to support traceability? [Yes/No]. Please explain your answer.

No. Whilst there is a lot of detail on product information within this chapter, particularly in relation to the impact of digital data. Specific guidance on what the minimum standard required for specific product information required should be provided by government.

Question 26 - Should digital labelling be available as an alternative to the UKCA mark? [Yes/No].

No. We have addressed the worthwhile nature of digital labelling in our answer to question 25 but UKCA marking needs a final decision as to what will happen with it, as the date of its mandatory use has been changed a number of times over the last number of years. UKCA has been an expensive issue for the ironmongery and door industry. As stated previously there is a huge influence on our industry from harmonised/designated standards and as a result, millions of pounds has been spent on certification, labelling and stamping of the UKCA logo on products such as door closers, hinges and lock forends.

CE marking does seem to provide the answer going forward as a renowned and trusted conformity mark for construction products, although the UK Approved Bodies not being able to issue CE marking would be a concern for these companies if UKCA is disbanded. This would therefore require a mutual recognition agreement needing to be in place to allow certification and testing by UK Bodies being equally accepted in the UK and EU and vice versa with their European equivalents.

There is also the issue of UKNI marking which has not been addressed in the green paper and clarification on the future of this conformity marking would also be useful.

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Lessons must be learned on the use of future conformity marking schemes as industry has paid out a massive amount over these past years in relation to UKCA marking.

Question 27 - Is there a role for government in establishing voluntary product marks, for example to demonstrate a higher standard has been met? [Yes/No]. Please explain your answer.

Yes. Being able to visibly demonstrate a higher standard has been met is worthwhile, and this is already in place in the hardware and door industry through the display of the logos of the schemes on products such as Kitemarks on locks and Certifire marking on hardware products.

That said, as there are a number of product markings already available for products such as conformity marks as well as third party certification marks, there is some concern that further markings could confuse the market further as well as cause further expense.

8

ASSURANCE AND OVERSIGHT OF TESTING AND CONFORMITY ASSESSMENT

Question 28 - Do you consider that the measures set out above in Chapter 8 would provide sufficient oversight of conformity assessment? [Yes/No]. Please propose any further measures you consider may be necessary.

Yes. Oversight of CABs through the National Construction product Regulator would be of use although it does call in to question the role of UKAS in this area. The role of UKAS must be clarified by the regulator.

Question 29 - Should the government have the ability to recognise conformity assessment activity undertaken by CABs established outside of the UK? [Yes/No]. Please explain your answer.

Yes. The industry is likely to support the government having the ability to recognise conformity assessment activity undertaken by CABs established outside of the UK, primarily to reduce trade barriers, maintain supply chains, and access necessary expertise. However, this support would be strongly conditional on the establishment of a robust and transparent framework to ensure equivalent standards, proper oversight, and the continued safety and performance of construction products in the UK market.

Question 30 - What support do UK CABs need to invest, grow and improve their skills?

One GAI member recommended succession planning and broadening out of skills for UK CABs. Also more theoretical testing could be considered as opposed to continual repeating of fire testing for each customer, the results could be reviewed against known historic results and then the potential for acceptance or denial could be assessed rather than specific need for new testing. Artificial Intelligence could also have a part to play in this going forward.

Question 32 - What are the strengths and weaknesses of the standards development process, and where could it improve?

The strength of the standard development process is that it relies on consensus and a robust process for public comment on standards. This is not just in BSI but is mirrored in Standards Developing Organisations worldwide. It also relies heavily on industry experts including manufacturers and Trade Associations as well as other key stakeholders including charities, consumer interest groups and government. This provides a broad range of expertise and viewpoint. ISO refers to standards being “distilled wisdom” which is most apt.

The weakness with standards is that with such heavy reliance on volunteers it does have an impact on how long it takes to create or revise a standard which can normally be 2 to 3 years.

Question 33 - What opportunities are there for government and the national regulator to work more collaboratively with the BSI?

Increased involvement with government sending more representatives on to BSI committees and drafting and revision panels. I have already personally seen examples of government working on standards within BSI committees. This includes representation on committees on accessibility and fire safety. This means

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that government already has an active role in creation of standards such as BS 8300 and BS 9991 and this is welcomed by those of us involved in drafting or revising standards or chairing BSI Committees.

Question 34 - Should mandatory standards be free to access? [Yes/No]. If yes, please provide suggestions on how this could be achieved, including funding.

Whilst this would have an impact on funding of BSI it is felt by industry that harmonised/designated standards which have legal implications (under Construction Products Regulation) should be freely available. Industry feels that government should work to subsidise this process. Trade Associations can help with detailed advice on standards to their members.

Question 35 - Do you agree that an increase in public and private sector testing capacity is required? [Yes/No]. Please explain your answer. If yes, please include information on the gaps this might address.

There is a gap in the provision of fire testing as well as the provision of test reports as demand continues to be huge. Anecdotally it is still a number of months wait for a fire test and test report. Anything which can be done to relieve the backlog would be welcomed. Industry is already playing its part with the recent opening of more test laboratories.

Question 36 - What should the government's role be in supporting R&D in relation to construction products and the wider built environment?

Industry feels that there is a need for government support, both financial and organisational, for R&D in product innovation.

One GAI member responds succinctly to this question as follows: "R&D is an expensive arena. Smaller organisations often lack the finances to engage in testing although they possess some of the best talent in the UK. I feel if funding were available for the national good then this would benefit all of us. For example – if a small business or even an individual were to be enabled to test and launch a product which would improve safety in the built environment but as a condition of funding, the evidence would be publicly available for others to adopt, this would be a positive springboard for all."

9

REGULATING THE MARKET

Question 37 - Do you agree with the proposed regulator functions that we have laid out? [Yes/No]. Please explain your answer.

Yes. The national regulator, with a single point of contact, is essential for effective reporting, triage, oversight, and enforcement. Past experience with Local Authority Trading Standards highlighted a need for sector expertise and centralised coordination. Trading Standards and other authorities should support, but not lead, the regulatory function. There also needs to be a significant investment in staffing levels as well as increased expertise and competence in this area.

Question 41 - Should the national regulator play a stronger role in enforcement of misleading marketing? [Yes/No]. Please explain your answer.

Yes. Once the national regulator is seen to become involved in cases of misleading marketing it will discourage others to go down the same path. We have already seen examples of OPSS being involved in product recalls for both fire doors and locking cylinders and welcome this involvement in the market as a means of increasing levels of product safety.

10 ENVIRONMENT AND SUSTAINABILITY

Question 53 - Should these environmental aspects, as reflected in the revised EU-CPR, cover products subject to a designated standard or a technical assessment? [Yes/No]. Please explain your answer.

Yes. Products with a designated standard or technical assessment should be required to provide environmental impact performance information. The GAI alongside Construction Products Association (CPA) members support the use of life cycle assessment (LCA) to measure the environmental impact of a product, and that this should cover the product life-cycle. We support that the life cycle assessment methodology should be to the EN standard BS EN 15804 as required by the new EU-CPR. This can be supplemented by specific product standards including BS EN 17610 which is the specific European Standard which provides the Product Category Rules (PCR) complementary to BS EN 15804 for building hardware.

Question 54 - What, if any, approach might there be to measuring and/ or mitigating the environmental impacts for products brought into the regulatory regime through a general safety requirement and should this be mandatory or voluntary?

As the requirement for LCA / EPD has been market driven then the same principles should apply to those products without a harmonised/ designated standard. If a manufacturer is going to make a claim on environmental performance then it should be evidenced to a Life Cycle Assessment to the methodology set out in BS EN 15804.

Whilst it should not be mandatory to have an LCA/EPD itself due to the huge burden on industry, with any manufacturer does make a claim it must be evidenced by an LCA/EPD, preferably to the appropriate EN standard.

11

FURTHER EVIDENCE REQUIREMENTS

Question 56 - Could you share any relevant information about the estimated size of the market as outlined in Chapter 1, and the construction products sector more broadly and its significance. If relevant to our wider reforms please refer to which part it is relevant to.

The UK doors market size was valued at USD 4.8 billion (£3.62 billion) in 2024 by Global Market Insights www.gminsights.com/industry-analysis/united-kingdom-doors-market.

The UK fire doors and partitions market generated a revenue of USD 736.1 million (£554.3 million) in 2024 and is expected to reach USD 1,268.6 million by 2030 according to Horizon grand view research.

GAI in association with AMA Research discovered that the approximate percentage value of ironmongery to doors is 25% of the value of a complete doorset or assembly. This would therefore put the value of the ironmongery market on doors generally at £1.2 billion and specific to fire doors at £138.6 million.

Question 58 - Is there anything else you would like to inform us of, that you have not been able to through other questions in this publication?

GAI continues to be concerned that with BS 476 standards being omitted from Approved Document B from September 2029, that assessments for fire doors and corresponding hardware will no longer be permitted. The GAI is concerned that a move solely to EN 1634-1 with its more rigid Extended Application (EXAP) rules without assessment would significantly restrict the scope of hardware and fire doors. We are happy to play our part in working with government to looking at how industry can bridge this gap.

GAI's response to this Green Paper reflects our deep commitment to improving safety, performance, and transparency in the construction product supply chain. The Guild supports the Green Paper's overall direction but urges that reforms be implemented decisively, with real enforcement capability and industry-wide accountability.

GAI acknowledges the need for radical reform and supports the creation of a robust, transparent framework that enforces compliance and ensures products perform as claimed throughout their life-cycle. The Guild argues that the status quo is insufficient, especially regarding safety-critical items like door hardware, which must meet stringent standards not only at the point of sale but also in operation. The GAI urges the government to adopt its recommendations to avoid future tragedies and help to build a credible, transparent regulatory regime that protects building occupants and restores trust in the construction products sector.

END

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Guild of Architectural Ironmongers

The Guild of Architectural Ironmongers (GAI) is the only trade body in the UK that represents the interests of the whole architectural ironmongery industry - architectural ironmongers, wholesalers and manufacturers. Its reputation is built on three key areas: education, technical support and community.
Its qualifications, education and CPD programmes are widely respected in the UK and overseas, including the GCC and Hong Kong. Its technical information service is the only specialist service of its kind, providing GAI members with comprehensive advice on issues relating to the legislation, regulations and standards governing the use of architectural ironmongery and related hardware. The GAI is run by the industry for the industry.

www.gai.org.uk