



GAI INDUSTRY RESPONSE TO CONSULTATION ON THE GENERAL SAFETY REQUIREMENT (GSR)

Submitted on behalf of the Guild of Architectural Ironmongers (GAI)

This document summarises the GAI's submitted response to the proposed General Safety Requirement (GSR) consultation.

The GAI's input reflects Technical Committee analysis, member feedback, and consultation across the architectural ironmongery sector following wider industry engagement and submissions.

EXECUTIVE SUMMARY / INTRODUCTION

The Guild of Architectural Ironmongers (GAI) welcomes the opportunity to respond to the Consultation on the General Safety Requirement (GSR), which forms a central component of the Government's wider programme of reform set out in the Construction Products Reform White Paper. The GSR represents a significant shift in the regulatory approach, moving beyond a system primarily based on compliance with standards towards one that places greater emphasis on safety in use, lifecycle performance, and shared responsibility across the supply chain.

GAI supports the overall intent of the GSR in addressing the systemic failures identified following the Grenfell Tower tragedy, particularly the need for improved product information, stronger accountability, and a greater focus on real-world performance. However, a fundamental concern remains that, as currently proposed, the GSR may in practice be applied primarily to non-harmonised or non-designated standard products. Given that much of the architectural ironmongery sector—including critical components such as hinges, door closers, door co-ordinators, locks, and escape hardware—is covered by harmonised or designated standards, this risks creating inconsistency in the application of safety requirements and undermining the objective of establishing a universal safety baseline.

GAI's members play a key role in the manufacture, supply, and specification of products used within safety-critical systems, particularly fire doors, which are highly dependent on the correct interaction of multiple components and on competent specification and installation. The GSR must therefore recognise the importance of system performance, ensuring that safety



is considered in the context of how products are used in practice rather than solely through compliance at the point of manufacture.

The Guild also highlights several key themes that are critical to the successful implementation of the GSR. These include the need for clear and proportionate responsibilities across all economic operators, improved traceability and product information supported by digitalisation, and a significantly strengthened focus on competence across the supply chain. In particular, GAI supports the development and adoption of competence frameworks such as BS 8670-2 and emphasises the importance of recognising designers and specifiers, aligned with the Construction (Design and Management) Regulations, as key duty-holders within the system.

Finally, GAI notes that the success of the GSR will depend not only on the design of the regulatory framework but on its practical implementation, including sufficient testing capacity, clarity of guidance, and effective enforcement. The Guild remains committed to working collaboratively with Government and industry stakeholders to ensure that the GSR is applied consistently, proportionately, and in a way that delivers meaningful improvements in building safety.

PREVIOUSLY USED PRODUCTS

Question 1 - Do you agree that previously used products should be regulated in the same way as new products, unless the exemption applies?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - DISAGREE

Whilst GAI agrees in principle that previously used construction products could be subject to regulatory oversight to ensure that safety is not compromised when products are reused, we consider that applying identical requirements to both new and previously used products may not always be proportionate or practical, particularly where historic performance data, traceability, or certification evidence may no longer be available.

GAI notes that while wider policy initiatives promote increased reuse of construction products as part of circular economy objectives, there is currently limited specific guidance supporting the safe reuse of door hardware, particularly within safety-critical systems such as fire doors or even for escape doors. Existing standards and certification schemes are based on tested product configurations and controlled manufacturing processes, and do not readily accommodate reused components where traceability, condition, and performance cannot be reliably verified. In practice, the performance of door hardware is dependent on its interaction within a complete system, and the reuse of individual components risks undermining this system-based performance. GAI therefore considers that reuse of hardware within safety-critical applications should not be permitted due to the nature of the application. Re-use of hardware outside this scope is, however an area worth further consideration.

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DUTY UNDER REGULATION

Question 2 - Do you agree with the proposal set out above of an overarching safety requirement on economic operators?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

GAI supports the introduction of an overarching safety requirement on economic operators, as this represents an important shift away from a purely compliance-based approach towards one focused on safety in use. This aligns with the lessons of the Grenfell Inquiry and reinforces the principle that responsibility for safety extends beyond meeting minimum standards.

However, it is essential that this duty is applied consistently across all products. There is a concern that in practice the GSR may be primarily applied to products outside harmonised or designated standards. Given that much of the architectural ironmongery sector is covered by such standards, this would create an inconsistent approach and undermine the objective of establishing a universal safety baseline.

GAI therefore strongly supports the application of the overarching safety requirement to all construction products, ensuring that compliance with standards does not replace the need to demonstrate safety in use.



ASSESSMENT OF RISK

Question 3 - Do you agree that the measures described as part of the process for assessing risk are reasonable and proportionate?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

The consultation proposes that manufacturers undertake a proactive, evidence-based risk assessment for products within scope of the General Safety Requirement before placing them on the market. GAI agrees that the proposed approach to risk assessment is broadly reasonable and proportionate, particularly in recognising that safety must be assessed in the context of real-world use and not solely through compliance testing.

The emphasis on life-cycle performance and interaction with other products is particularly important for system-based applications such as fire doors or security doors, where the performance of individual components cannot be considered in isolation. Risk assessment must therefore take account of system integration, installation, maintenance, and reasonably foreseeable misuse.

However, proportionality will depend on clear guidance to industry. Smaller organisations in particular will require support in understanding expectations and applying consistent methodologies. Aligning risk assessment processes with existing standards and certification schemes, where appropriate, will help ensure practical implementation. Assistance with provision of templates for risk assessments may form part of the support which Trade associations can give to industry.

4

PROVISION OF PRODUCT INFORMATION

Question 4 - Are the proposed duties on manufacturers under the General Safety Requirement clear and proportionate?**GAI Context**

Do you think the above list of criteria for product information is proportionate, as well as sufficient to support decisions to select the right product? If not, what further information do you think would be helpful?

- Yes
- No
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

GAI supports the proposed duties on manufacturers to provide clear, accurate, and comprehensive product information, recognising that poor-quality information was a key failure identified in the Grenfell Inquiry.

Product information must enable those specifying, procuring, and installing products to make informed decisions based on intended use, limitations, and system compatibility. For safety-critical applications such as fire doors, this information is essential to ensuring correct product selection and integration.

However, it is important that requirements are proportionate and do not lead to unnecessary duplication of information already available through standards, certification schemes, or industry initiatives such as the Code for Construction Product Information (CCPI). Greater alignment with these existing frameworks would support consistency while reducing burden.

GAI is a strong supporter of CCPI as a Trade Association member and whilst there has been some small initial uptake with one GAI member in particular, there is still a lack of engagement in our sector which is a concern.

5

PRODUCT LABELLING

Question 5 - Do you agree with the proposals on product labelling?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

It is noted that the consultation highlights the importance of product labelling and traceability as a key part of ensuring product safety and enabling effective regulatory action where issues arise. GAI agrees with the proposals to improve product labelling and traceability, recognising that clear identification is essential for both safety and enforcement.

The move towards digital product information linked to physical identifiers is particularly welcomed, as it supports access to up-to-date information across the product lifecycle. This has clear benefits in improving traceability and supporting maintenance and inspection activities.

GAI continues to support industry digitalisation by contributing to the development of Product Data Templates for doorsets and ironmongery, and through its work on a new European Technical Specification for data dictionaries for building hardware, enabling more consistent, transparent, and accessible product information to support safe product selection and use.

However, it is important that labelling requirements are practical and proportionate, particularly for smaller components where space is limited. Flexibility in how information is provided will be necessary, provided that traceability is maintained.



REQUIREMENT TO RETAIN RECORDS

Question 6 - Do you agree that the manufacturer should maintain records of such actions for a period of 10 years beyond the last supply of the product?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

The consultation proposes that manufacturers retain key documentation relating to product safety for a defined period, including risk assessments, product information, records of safety incidents, and any actions taken in response. The GAI broadly supports the requirement for manufacturers to retain such records, recognising the importance of traceability and accountability. However, a fixed 10-year requirement may not be appropriate for all products, given the varying lifespans within the construction sector.

For long-life safety-critical products such as door hardware and fire door components, a longer retention period may be more appropriate, aligned with the expected service life of the product.

Clear guidance on what constitutes proportionate record-keeping will be essential to ensure that requirements are effective without placing unnecessary administrative burden on businesses.

7

REQUIREMENTS ON IMPORTERS

Question 7 - Do you agree with the proposals for the responsibilities of importers?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

The consultation outlines a defined role for importers as the first point of entry for products coming from outside the UK market, with responsibility for verifying that manufacturers have met their obligations under the GSR before products are placed on the market. GAI supports the proposed role of importers as a key checkpoint within the supply chain, ensuring that products entering the UK market meet safety requirements as outlined in the GSR where appropriate. A concern raised however is that there needs to be a form of policing for products which do not meet requirements such as through Trading Standards or OPSS.

However, it is important that importer responsibilities are clearly defined and supported by practical guidance. Importers must have access to sufficient information to verify compliance, and accountability must be clearly delineated between manufacturers and importers to avoid duplication or ambiguity.



IMPORTER LABELLING

Question 8 - Do you agree with the proposals to make importers label products as set out above?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

The consultation proposes that importers provide additional identifying information on products they place on the UK market, including their name and address, alongside manufacturer details. GAI agrees that importers should provide identifying information to support traceability and accountability.

However, requirements should be proportionate and aligned with existing labelling systems such as those outlined in European designated standards in order to avoid duplication. Consistency across manufacturer and importer labelling will be important to ensure clarity for users and regulators.



IMPORTER RECORD KEEPING

Question 9 - Do you agree with the proposed requirements on importers to retain records as set out above?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

The consultation introduces requirements for importers to retain documentation and records relating to the products they place on the market, including supply chain information and safety incident data. GAI supports the principle of record retention for importers as part of ensuring traceability. As with manufacturers, proportionality will be important. Requirements should reflect the scale of operations and the level of risk associated with the products involved.

10 OBLIGATIONS ON CONSTRUCTION PRODUCTS DISTRIBUTERS

Question 10 - Do you agree with the proposed requirements on distributors as set out above?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

The consultation identifies distributors, including merchants, as having a role in supporting product safety before supply. GAI agrees that distributors have a role in supporting product safety, but this role must be clearly defined and proportionate.

Distributors (including architectural ironmongers) must ensure that products are accompanied by appropriate information in addition to ensuring compliance with relevant standards and regulations. Clear guidance will however be required to ensure consistency and avoid imposing unrealistic expectations.

This reflects a shift towards shared responsibility across the supply chain, recognising that safety assurance does not rest solely with manufacturers but also with those involved in supplying products to contractors or end users.

11 PROPORTIONALITY OF DISTRIBUTOR RECORD KEEPING

Question 11 - Do you think the requirement of creating records of purchase and supply and retaining such records for 10 years to allow for traceability is proportionate?

- Yes
- No
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

GAI considers that record-keeping requirements for distributors can support traceability but must be proportionate to the scale and nature of operations.

For high-volume distributors, requirements must be practical and aligned with existing business processes to avoid excessive administrative burden.

It is therefore agreed by GAI that retention of records for 10 years is proportionate.

12

FULFILMENT SERVICE PROVIDERS

Question 12 - Do you agree with the proposed requirements on fulfilment service providers as set out above?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

The consultation proposes aligning with EU requirements by introducing obligations for fulfilment service providers, recognising their role in modern supply chains. These requirements focus on ensuring that products are supplied with appropriate documentation and labelling, and that records of movement are maintained.

GAI supports the inclusion of fulfilment service providers within the regulatory framework, reflecting changes in modern supply chains.

However, their responsibilities must be clearly defined and proportionate to their role, focusing on ensuring that products are correctly handled and accompanied by appropriate documentation.

13

STORAGE AND TRANSPORTATION

Question 13 - Do you agree that we should require economic operators to make sure that the way they store, or transport, products does not cause them to become unsafe?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

The consultation highlights the importance of ensuring that products remain safe throughout storage and transportation, recognising that conditions during handling and distribution can affect product performance. GAI agrees that economic operators should ensure that storage and transportation do not compromise product safety. This is particularly important for components where performance may be affected by environmental conditions or handling.

14

MONITORING PRODUCTS ON THE MARKET

Question 14 - Do you agree or disagree with the proposals for economic operators to monitor construction products that have been placed on the market?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

The consultation proposes that economic operators actively monitor products once they are on the market, including investigating complaints, recording safety incidents, and taking appropriate corrective action where necessary. GAI strongly agrees with the proposal for ongoing monitoring of products once placed on the market, recognising that safety must be managed across the product lifecycle. This represents a positive shift towards continuous improvement and learning from real-world performance.

It should be noted that many GAI members already operate robust quality systems and CRM processes to manage complaints and pro-actively address safety incidents and issues, often as part of their ISO requirements. However, within the SME segment, there is a notable lack of consistent governance and control, which presents a potential risk.

15

CO-OPERATION WITH ENFORCEMENT AUTHORITIES

Question 15 - Do you agree that economic operators should have a duty to co-operate and carry out actions when they are asked to by an enforcement authority?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

GAI agrees that economic operators should cooperate with enforcement authorities. This reflects the need for effective regulatory oversight, supported by access to accurate and timely information. The proposals also emphasise the importance of maintaining records that enable supply chain traceability and support enforcement activity.

16

UNDERTAKINGS AS AN ALTERNATIVE TO ENFORCEMENT

Question 16 - Do you agree that enforcement authorities should be able to accept an undertaking instead of taking formal enforcement action?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

GAI supports the use of undertakings as a proportionate enforcement tool, provided that serious or repeated non-compliance is still subject to stronger action.

17

CIVIL MONETARY PENALTIES

Question 17 - Do you agree with the proposal to introduce civil monetary penalties for non-compliance with requirements under the GSR?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

GAI supports the introduction of civil monetary penalties as part of a proportionate enforcement framework.

This will help create a credible deterrent and support a level playing field across the industry. It will also aim to strengthen accountability and act as a deterrent to unsafe practices.

18

ROLE OF LOCAL AUTHORITY TRADING STANDARDS (LATS)

Consultation reference:

- *Chapter 9 (9.13-9.19)*

Question 18 - Do you agree with the proposal to not extend powers to issue civil monetary penalties to LATS under the GSR, recognising their reduced role in enforcing construction product regulations?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

GAI supports a co-ordinated enforcement approach led by OPSS the national regulator, with local authorities (Trading Standards) playing a supporting role where appropriate. Consistency and clarity in enforcement responsibilities will be critical.

19

COST RECOVERY NOTICES

Question 19 - Do you agree with the proposal on cost recovery notices that the enforcement authority is able to issue?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

GAI agrees with the consultation where it proposes allowing enforcement authorities to recover costs from non-compliant businesses where enforcement action has been required. This reflects the principle that the cost of non-compliance should not fall solely on the public sector, and aims to promote accountability and fair use of public resources. It is noted that the cost recovery should be proportionate and directly linked to enforcement activity.

20

COST RECOVERY POWERS FOR LATS

Question 20 - Do you have views on whether LATS should have powers to issue cost recovery notices, as well as the national regulator for construction products?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

GAI supports a coordinated enforcement approach led by OPSS the national regulator, with local authorities (Trading Standards) playing a supporting role where appropriate. Therefore LATS should have these powers but under supervision of OPSS

21

APPEALS PROCESS

Question 21 - Do you agree with the time periods that an economic operator has to lodge their appeal?

- Agree
- Disagree
- Neither agree nor disagree
- Don't know

Please explain your answer and include any changes you would make to the proposals.

GAI Response - AGREE

GAI supports the need for a fair and transparent appeals process, recognising the importance of balancing effective enforcement with appropriate rights for economic operators. This reflects the need to balance swift enforcement in cases of safety risk with appropriate rights for economic operators to challenge decisions.

The proposed appeal timescales are broadly consistent with those applied in other regulated sectors, with a 21-day period for standard notices reflecting established practice. The shorter 7-day timeframe for challenging more serious notices is also aligned with risk-based approaches where safety is paramount, although it may present practical challenges in more complex cases and should be supported by clear guidance to ensure it is workable in practice.



The GAI is the professional association championing the architectural ironmongery sector, representing AIs, distributors and manufacturers in the UK and around the world. By promoting best practice through our educational programmes, community forums and technical advice for members, we help to ensure regulatory compliance and raise standards, keeping people and their property safe and secure.

Our work is built on three core pillars:

Education - We offer a worldwide programme of courses and qualifications, leading to specialist diploma qualifications and ultimately to GAI Registered Professional status, the benchmark for demonstration of professional competence in architectural ironmongery.

Technical - We advise on issues relating to the legislation, regulations and standards governing the use of architectural ironmongery and related hardware.

Community - As a membership organisation we provide the voice of the architectural ironmongery industry, bringing the sector's people and companies together and representing them on UK and international standards committees, drafting panels, industry consultations, and more.

Through its mission of 'advancing architectural ironmongery', the GAI works to ensure and improve the safety, security and accessibility of the worldwide built environment.

Guild of Architectural Ironmongers

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