



GAI INDUSTRY RESPONSE TO THE CONSTRUCTION PRODUCTS REFORM WHITE PAPER

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

This document summarises the GAI's submitted response to the Government's Construction Products Reform White Paper 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 publication of the Construction Products Reform White Paper and the opportunity to respond to what represents a significant and wide-ranging programme of regulatory reform. The proposals form a key component of the Government's response to the Grenfell Tower tragedy and subsequent reviews, including the Hackitt Review, and seek to address long-standing systemic issues within the construction products sector, including fragmented regulation, inconsistent product information, weak enforcement, and insufficient levels of competence and accountability across the supply chain.

GAI supports the overall direction of reform and the ambition to create a more robust, transparent, and safety-focused regulatory framework. Our sector plays a critical role in building safety, particularly in relation to fire doors and associated hardware, which are explicitly identified within the White Paper as products critical to safe construction. The performance of these systems depends not only on compliant products, but on correct specification, integration, installation, and maintenance, all of which rely on competent professionals and clear accountability throughout the product lifecycle.

While the intent of the White Paper is strongly supported, GAI has identified a number of key issues that require clarification to ensure that the reforms achieve their intended outcomes. Of particular concern is the proposed application of the General Safety Requirement (GSR). There is a risk that the GSR will, in practice, be applied primarily to non-harmonised or non-designated products, thereby excluding a significant proportion of



the market from its scope. Given that much of the architectural ironmongery sector is covered by harmonised/ designated standards—including life-safety critical products such as hinges, door closers, locks, and escape hardware—this approach risks creating inconsistency within the regulatory framework and undermining the objective of establishing a universal safety baseline. GAI therefore strongly recommends the application of the GSR across all construction products, ensuring a consistent, system-wide approach to safety.

GAI also highlights the need to address the limitations of existing standards and marking regimes. Many harmonised/designated standards (including for products such as hinges, closing devices and escape hardware) were not developed with safety as their primary objective, and product markings such as CE and UKCA are frequently misunderstood as indicators of fitness for purpose in specific applications. This reinforces the importance of ensuring that regulation focuses on how products are used in

EXECUTIVE SUMMARY / INTRODUCTION

practice, particularly as part of systems such as fire doors.

An area that requires further clarity and strong guidance arises from the continued coexistence of CE and UKCA marking. While the recognition of CE marking provides practical benefits, it creates duplication and some lack of definition and thus raises concerns regarding the influence and impact of UK Approved Bodies. The guidance is needed to support both market functionality and regulatory resilience. As UKCA marking is essentially a direct equivalent of CE marking for the Great Britain market—based on the same underlying standards—it raises questions about its necessity. In this context, there is a strong case for its removal and a return to a single, widely recognised conformity mark, namely the CE mark.

Central to all aspects of reform is the need to strengthen competence and accountability. GAI strongly supports the development and adoption of competence frameworks, including BS 8670-2, and emphasises the importance of recognising designers and specifiers, in line with the Construction (Design and Management) Regulations, as key dutyholders within the construction products regime. Without demonstrable evidence based and periodically assessed competence at every stage, regulatory reform alone will not deliver meaningful improvements in safety outcomes.

It is also essential that the demonstration of competence must be central to the regulatory framework. While BS 8670-2 represents a positive step towards consistent standards, it is unlikely to fully close

the existing competence gap on its own. Clear regulatory recognition is needed to ensure that individuals working with construction products can demonstrate appropriate and verifiable competence. This will likely require a formal mechanism, such as a recognised professional register, to ensure individuals are properly qualified, maintain up-to-date knowledge through CPD, and can be held accountable. Without this, there is a risk that competence frameworks remain advisory rather than driving meaningful change.

Finally, GAI notes that successful implementation will depend on proportionate transition periods, sufficient testing and certification capacity, and a significantly strengthened regulatory presence with effective enforcement. It is essential that industry is given the clarity, time, and support required to adapt, while avoiding unnecessary duplication of cost or disruption.

In summary, GAI supports the objectives of the White Paper but emphasises that achieving safer buildings will require a coherent, systemwide approach that aligns regulation, standards, competence, and enforcement. GAI remains committed to working collaboratively with Government and industry to ensure that the final framework is practical, proportionate, and capable of delivering lasting improvements in building safety.

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QUESTION 1

What should be included in guidance to support industry to understand their responsibilities regarding products critical to safe construction?

The Guild of Architectural Ironmongers (GAI) supports the development of comprehensive and practical guidance to assist industry in understanding its responsibilities regarding products critical to safe construction. Such guidance must be firmly rooted in the lessons of the Grenfell Tower tragedy, which demonstrated that product compliance, testing, and certification were often treated as ends in themselves rather than as part of a wider system ensuring safety in use. It is essential that future guidance places safety outcomes at its core, addressing the historic failure to ensure that safety remained the central focus across the construction products regime.

In this context, the explicit recognition of fire doors within the White Paper as products critical to safe construction is particularly important. Fire doors are life safety systems, and their performance relies on the correct interaction between door leaves, frames, hardware, seals, and installation. GAI members play a central role in this process, both as manufacturers and suppliers of hardware components and as professional specifiers responsible for selecting appropriate products. The safe performance of fire doors is therefore dependent not only on product compliance but also on correct specification, integration, and installation by competent professionals. Guidance must therefore move beyond a product-only view and recognise system performance.

A fundamental requirement is that guidance clearly distinguishes between

regulatory compliance and fitness for purpose. Construction products are components within systems, and their performance can only be assessed in the context of their intended use.

It is important to recognise that the European Construction Products Regulation (CPR) was not originally designed with safety as its primary objective, but rather to facilitate the free movement of construction products within the internal market. While the White Paper seeks to place greater emphasis on safety within the UK regulatory framework, it remains unclear whether this will fundamentally shift the underlying structure of a system still heavily reliant on standards that were not developed with safety as the central consideration.

This issue is further compounded by the ongoing revision of harmonised and designated standards under the new European CPR. These standards will continue to be developed through European processes, with the UK having limited influence relative to its previous position. This raises concerns about the extent to which UK-specific safety priorities and practical considerations will be effectively reflected.

Against this backdrop, there is a risk that the GSR will, in practice, be applied primarily to non-harmonised or non-designated products, thereby excluding a significant proportion of the market from its scope. Given that much of the architectural ironmongery sector is covered by harmonised/ designated standards—including life-safety critical products such as hinges, door closers, locks, and escape hardware—this approach risks creating inconsistency within the regulatory framework and undermining the

1 QUESTION 1

objective of establishing a universal safety baseline. GAI strongly supports the universal application of the GSR to all construction products, ensuring a coherent and level baseline for safety irrespective of whether products fall within the scope of designated standards. Excluding life safety products as outlined above from the scope of the GSR would therefore create a substantial gap within the safety framework, undermining the overall objective of reform.

A further point to note on GSR by one GAI member is that “what is lacking in detail in guidance is around auditing and enforcement, particularly when applicable to the GSR route of placing products on the market.”

An area that requires further clarity and strong guidance arises from the continued coexistence of CE and UKCA marking. While the recognition of CE marking provides[SB1.1] practical benefits, it creates duplication and some lack of definition and thus raises concerns regarding the influence and impact of UK Approved Bodies. The guidance is needed to support both market functionality and regulatory resilience. As UKCA marking is essentially a direct equivalent of CE marking for the Great Britain market—based on the same underlying standards—it raises questions about its necessity. In this context, there is a strong case for its removal and a return to a single, widely recognised conformity mark, namely the CE mark.

The responsibilities of designers, including specifiers, must be clearly defined and aligned with The Construction (Design and Management) Regulations 2015 . Designers play a critical role in product selection and safety outcomes,

particularly for fire doors. This is of major importance for the ironmongery industry wherein specification of product plays such a vital part.

Finally, demonstration of competence must be central. The new BS 8670 2 competence standard provides a structured approach to competence in construction products and represents a positive step forward in establishing consistent expectations across the sector. However, while GAI is supportive of the direction of travel, we do not consider that the standard alone will fully address the existing competence gap. It is essential that there is explicit recognition within the regulatory framework that those working with construction products must be competent to an appropriate and demonstrable level.

GAI believes that achieving this in practice will require the introduction of a formal mechanism to verify and maintain competence, such as a recognised professional register for those involved in the specification, manufacture, installation, and inspection[SB2.1] [DM2.2] of construction products. Such an approach would provide greater assurance that individuals are appropriately qualified, maintain up to date knowledge through Continuing Professional Development (CPD) and can be held accountable for their decisions. Without this level of assurance, there is a risk that competence frameworks remain advisory rather than delivering the step change in behaviour and capability that the reforms seek to achieve.

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QUESTION 2

Do you agree that the above principles should underpin the licensing regime for Conformity Assessment Bodies (CABs)?

Yes. GAI agrees that the proposed principles should underpin a licensing regime for CABs, particularly given the deficiencies identified through the Grenfell Inquiry. However, this regime should build upon existing strong practices, including third-party certification schemes and Factory Production Control, which already provide robust assurance. The door and hardware industry is already well versed in third party certification schemes including schemes such as Q Mark, Certifire, Kitemark and whilst these are voluntary, are very much seen as best practice for the industry.

A revised licensing regime should therefore build upon, rather than replace, these existing mechanisms, ensuring consistency, transparency, and independence while preserving the robustness of current standards-based systems. It is essential that CAB oversight is strengthened without undermining the credibility or operational effectiveness of established certification schemes which already play a critical role in demonstrating compliance, particularly for safety-critical products such as fire doors and associated hardware.

Concerns have also been raised that potential added requirements for the CABs to meet, will increase pricing and add to the current delays already widely experienced within industry.

The regime must also recognise the importance of maintaining alignment with European systems. As highlighted in our previous response to the Green Paper, the construction products sector operates across a pan-European market, and divergence in certification requirements risks creating barriers to trade, duplication of testing, and increased costs with no corresponding safety benefit. A framework that supports mutual recognition of assessment outcomes would therefore be highly beneficial, ensuring that UK CABs remain competitive and capable of servicing both domestic and European markets.

Finally, competence within CABs themselves must be addressed. Those undertaking testing and certification activities must demonstrate appropriate levels of knowledge and experience, particularly in system-based applications such as fire door assemblies. Alignment with competence frameworks such as BS 8670-2 should be encouraged to ensure a consistent and reliable standard across the sector.

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QUESTION 3

Do you agree that this national testing and research facility would lead to the highlighted benefits?

Yes. GAI supports the development of a national testing and research capability, recognising the need to address both capacity constraints and the loss of independent technical authority within the UK system. There is clear evidence of ongoing delays in access to testing, particularly in fire testing, which directly affects the ability of manufacturers and suppliers to demonstrate compliance and bring products to market

A national facility would provide an opportunity to strengthen the technical infrastructure supporting the construction products sector, offering independent verification of performance, supporting enforcement activity, and helping to rebuild confidence in testing outcomes. This is particularly important for safety-critical systems such as fire doors, where reliable evidence of system performance is essential.

However, it is important that this facility complements existing private sector provision rather than displacing it. Industry has already invested significantly in expanding testing capacity, and a collaborative approach that leverages both public and private capability is likely to be the most effective.

Additionally, the role of such a facility should extend beyond testing alone to include research, guidance, and support for standards development. This would help address the wider decline in technical expertise and support the development of improved methodologies, particularly for system-based performance assessment.

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QUESTION 4

What opportunities are there for government to establish partnership models to establish new public sector testing and research capacity?

GAI recognises that partnership models provide a practical route to expanding testing and research capacity while building on existing expertise across industry and academia. Collaborative approaches could enable faster scaling of capability and more efficient use of resources.

However, it is essential that independence remains at the core of any such model. The credibility of testing and research outputs is fundamental to trust in the system, and any perception of commercial influence must be avoided. Governance arrangements should therefore be clear, transparent, and designed to maintain impartiality.

Partnerships should also support

skills development and competence, addressing the broader industry challenge of declining technical expertise. Linking testing, research, and training would help reinforce understanding of system performance, particularly in safety-critical applications such as fire doors.

At the same time, care must be taken to avoid duplication of existing structures or the creation of overly complex frameworks that add cost without clear benefit. A coordinated approach is required to ensure that partnership models deliver practical and measurable improvements

One opportunity outlined by GAI members would be for a public funded testing facility to increase overall capacity and reduce both time delays and ever escalating pricing in this arena.

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QUESTION 5

Would there be a benefit to enabling employment protections, for individuals reporting risks, bad practices and non-compliance within their own organisation, to the national regulator for construction products?

Yes. GAI supports improved reporting mechanisms and greater transparency within the regulatory system, recognising that effective intelligence gathering is essential to identifying risks and addressing non-compliance. Historically, limited enforcement has contributed to poor behaviours becoming embedded within parts of the sector.

Enhanced protections for individuals reporting concerns may support earlier identification of issues, particularly where safety-critical systems such as fire doors are involved. However, this must be balanced with existing mechanisms already available to industry, such as confidential reporting routes, and should not duplicate or complicate existing processes unnecessarily.

It is essential that reporting mechanisms are supported by effective regulatory action. Without visible investigation and enforcement, confidence in the system will remain limited. Reporting should therefore form part of a broader approach that includes improved surveillance, clearer accountability, and consistent enforcement.

Competence is also critical in this area. Those responsible for identifying and reporting issues must have sufficient knowledge to recognise risks, supported by appropriate training and frameworks such as BS 8670 2. In many cases, particularly for “in situ” matters such as door installation issues are context-specific, and all parties should be encouraged to raise concerns, which can then be assessed through a clear process by a suitably competent individual.

GAI members also consider that enforcement requires significant clarification and strengthening. There is currently a lack of confidence in the system, with those disregarding regulations and standards often not held accountable. While more robust frameworks may be followed by responsible parts of the industry, others will continue to operate outside them, creating a downward pressure on standards driven by price competition. Without effective enforcement, this risks becoming a continual “race to the bottom,” where standards are undermined. Stronger regulatory oversight is therefore essential to ensure that competition and compliance can coexist, rather than conflict.

An important element of competence within the SKEB model of competence is behaviour and protection of individuals displaying ethical behaviour including reporting unsafe practices, or being pressured to go beyond their competence levels should be of paramount importance.

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QUESTION 6

The Government would like to raise awareness and encourage the use of EN 15804+A2 as the methodology for producing an Environmental Product Declaration. What other opportunities could support best practice for products not covered by a designated standard? Please explain your answer.

GAI supports the promotion of EN 15804+A2 as a standardised methodology for Environmental Product Declarations and agrees with the need to align with European approaches. Maintaining consistency with EU frameworks is essential to avoid duplication, reduce burden, and support trade across the pan-European construction products market.

For products not covered by designated standards, a voluntary approach remains appropriate. As outlined previously in GAI response to Green Paper, environmental reporting has largely been driven by market demand, and this approach should continue to allow flexibility while encouraging best practice.

Any new requirements must be carefully considered to avoid imposing disproportionate burdens, particularly on SMEs. It is also essential that environmental objectives do not conflict with safety requirements. For safety-critical systems such as fire doors, performance in use must remain the overriding priority.

Greater coordination across government initiatives is required to avoid duplication and ensure that environmental measures are practical and aligned with existing industry practices.

It should also be noted that environmental performance will be an essential characteristic of new European harmonised/designated standards under the new European Construction Products Regulation.

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QUESTION 7

Are there any specific roles or points where accountability is not clear? If yes, please explain your answer and include who should be responsible.

GAI considers that there are specific roles within the construction product lifecycle where accountability is currently unclear, and this has been a contributing factor to the systemic failures identified by the Grenfell Inquiry. In particular, responsibility is often fragmented across the supply chain, leading to ambiguity in decision-making and a lack of clear ownership of safety-critical outcomes.

A key gap exists in the recognition of designers and specifiers within the construction products regulatory framework. Those who select and specify products, including architectural ironmongers, have a direct and significant influence on safety, particularly in relation to systems such as fire doors. However, they are not always formally identified as responsible parties. GAI considers that these roles should be explicitly recognised as dutyholders, aligned with the definition of “designer” under the CDM Regulations, with clear accountability for ensuring that products are appropriate for their intended use.

There is also a lack of clear accountability at the interfaces between design, specification, procurement, and installation, where decisions can be altered or diluted, for example through late-stage substitutions or “value engineering.” In such cases, responsibility for ensuring that substituted products meet the required safety and performance criteria is often unclear. GAI believes that accountability should sit with the party making the change, with a formal requirement for documented change control and justification.

In relation to installation and inspection, accountability is similarly unclear. For safety-critical systems such as fire doors, responsibility should rest with those carrying out the work and those verifying it, supported by demonstrable competence. GAI considers that installers and inspectors should be required to meet recognised competence standards, with responsibility reinforced through certification or registration schemes.

Another area of concern is that some economic operators, particularly those who “own-brand” or relabel products, may not recognise that they are acting as manufacturers and therefore subject to corresponding

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QUESTION 7 (CONT'D)

responsibilities. Greater clarity is required to ensure that all parties understand their obligations, supported by targeted communication and awareness initiatives to ensure consistent application across the market. GAI considers that improved clarity on the UK definition of “placing on the market” is necessary to support manufacturers and distributors in consistently meeting their regulatory obligations.

To address these issues more systematically, GAI considers that the adoption—or at least consideration—of a structured accountability model, such as a RACI (Responsible, Accountable, Consulted, Informed) framework, could provide greater clarity across the product lifecycle. Such an approach would help define not only who is involved at each stage, but critically who holds ultimate accountability for safety-critical decisions, reducing ambiguity and strengthening overall regulatory effectiveness.

Underpinning all of these issues is the need for demonstrable competence. The adoption of structured competence frameworks, such as BS 8670-2, is essential to clearly define expectations for all roles, including designers, specifiers, installers, and inspectors. Responsibility should be directly linked to competence, ensuring that those making decisions affecting product performance are suitably qualified and accountable.

Without clear allocation of responsibility across these roles, supported by enforceable competence requirements, the proposed reforms risk failing to deliver the intended improvements in safety outcomes.

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QUESTION 8

Do you have views on appropriate lead times or transition periods relating to specific reforms set out in this white paper?

GAI believes that appropriate lead times and transition periods are critical to the successful implementation of the proposed reforms and should be calibrated to reflect the complexity and scale of change across the construction products sector. A phased approach is essential, allowing industry sufficient time to adapt systems, develop competence frameworks, and ensure alignment across the supply chain.

For more complex reforms—particularly those relating to testing, certification, and competence—GAI considers that transition periods of up to 36 months may be appropriate. This reflects the time required not only to implement technical changes but also to build the necessary capacity and capability within the system. Experience with the introduction of UKCA marking demonstrates that compressed or poorly communicated transition periods can lead to significant cost, disruption, and inefficiency without delivering corresponding safety benefits.

Conversely, longer transition periods, where justified, can support more effective implementation. The example of the recent 60-month transition period for changes to fire testing requirements under Approved Document B has been widely welcomed within the fire door sector, providing a more realistic timeframe for industry to respond to significant technical change while maintaining continuity of supply.

GAI also considers that transition planning must be informed by a clear understanding of system capacity. In particular, ongoing issues with extended testing lead times highlight the need for Government to undertake a comprehensive assessment of current capacity within UK Conformity Assessment Bodies. Identifying any shortfalls at an early stage will allow targeted interventions to increase capacity and ensure that transition periods are both realistic and achievable.

Clear, consistent, and early communication of transition timelines will be essential to provide certainty for industry and to support effective planning and implementation.

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QUESTION 9

What should we take into account when developing the proposed tranches and sequencing?

GAI emphasises that sequencing of reforms is critical and must reflect the interconnected nature of the construction products system. Introducing requirements in isolation risks creating confusion and undermining effectiveness.

Reforms must be aligned across multiple areas, including standards, testing capacity, competence frameworks, and regulatory enforcement. For example, strengthening requirements on specification or installation must be accompanied by clear competence frameworks and accessible guidance.

For safety-critical systems such as fire doors, sequencing must ensure that all elements of the system are aligned, including product information, testing methodologies, and installation practices.

Ongoing engagement with industry will be essential to ensure that sequencing is practical and that unintended consequences are avoided.

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QUESTION 10

Do you have any views, evidence or insights regarding the impact that reforms might have regarding the costs and benefits to businesses, as well as any wider impacts?

GAI recognises that the proposed reforms are likely to introduce both direct and indirect costs to businesses across the construction product supply chain. These will include increased expenditure on compliance processes, testing and certification, improved product information, and the development and maintenance of competence. While such investment is necessary to address the systemic failings identified following the Grenfell Inquiry, it is essential that the scale and timing of these costs are proportionate and deliver demonstrable improvements in safety and performance.

There is clear evidence within the sector of the financial impact that regulatory change can have when implementation is not fully aligned with market realities. The introduction of UKCA marking provides a significant example, with the door and architectural ironmongery sector alone incurring substantial costs, running to millions of pounds, in certification, product marking, labelling, and administrative changes. With the continued recognition of CE marking, much of this investment is now at risk of being duplicated or rendered of limited long-term value with GAI members questioning the need to certify to both UKCA and CE conformity marking. This highlights the importance of ensuring that

future reforms are coordinated, clearly communicated, and aligned with international systems where appropriate, in order to avoid unnecessary duplication and wasted cost.

More broadly, there is a need to recognise how costs are absorbed within the construction sector. In practice, increased regulatory costs are often borne initially by manufacturers and suppliers, reducing margins in an already competitive market. Over time, these costs are typically passed through the supply chain, ultimately impacting developers, clients, and end users. One wider consequence may therefore be an increase in overall construction costs, contributing to more expensive buildings. This is an important consideration, particularly in the context of broader policy objectives such as housing delivery and affordability.

Against these costs, the potential benefits of reform are significant and necessary. A more robust and transparent regulatory framework has the potential to deliver improved safety outcomes, particularly in relation to safety-critical systems such as fire doors, where failures can have severe consequences. In addition, stronger enforcement and clearer accountability should help create a more level playing field, reducing the ability of non-compliant products or practices to undercut responsible businesses. This has the potential to reward those already investing in quality, compliance, and competence.

There are also wider system benefits

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QUESTION 10 (CONT'D)

associated with improved product information, greater consistency in testing and certification, and enhanced competence across the supply chain. Together, these measures should contribute to increased confidence in construction products, improved decision-making, and a reduction in the risk of inappropriate product selection or use.

However, realising these benefits will depend on effective implementation. In particular, reforms must be supported by increased enforcement activity, improvements in testing capacity, and the embedding of competence frameworks such as BS 8670-2. Without these supporting measures, there is a risk that additional costs will be incurred without delivering the intended improvements in safety outcomes.

GAI therefore considers that while the direction of reform is supported, careful attention must be given to ensuring that costs are proportionate, duplication is avoided, and that the overall system delivers clear and measurable benefits in terms of safety, performance, and market confidence.

GAI considers that Government should explore the provision of targeted funding support to assist industry in implementing these changes, particularly in relation to competence, which is not currently subject to mandatory requirements. One practical approach would be to enable greater flexibility in the use of unspent apprenticeship levy funds, allowing these to be redirected towards upskilling and competence development across the sector.

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QUESTION 11

Do you have any other useful information that you wish to share that is not covered by your previous answers?

GAI emphasises the importance of recognising fire doors as safety-critical systems and the integral role its members play across their manufacture, supply, and specification. The effective performance of these systems depends on a holistic, system-based approach supported by competent professionals throughout the entire lifecycle, from design to installation and ongoing maintenance.

GAI has significant concerns that the continued recognition of CE marking, without a clear and equivalent role for UKCA marking, may undermine the position of UK Approved Bodies. As UK bodies are not currently able to issue CE marking, there is a clear market incentive for manufacturers to rely solely on European certification routes. This risks eroding UK testing and certification capability over time, reducing domestic capacity and ultimately impacting the ability of the UK to maintain an effective and independent regulatory system.

GAI also highlights an ongoing technical concern regarding the planned withdrawal of BS 476 from Approved Document B in September 2029. A transition to reliance solely on EN 1634-1, particularly with the limitations imposed by Extended Application (EXAP) rules, risks significantly restricting the scope and flexibility of fire door and hardware solutions. GAI is keen to work collaboratively with government to identify pragmatic solutions that maintain safety while ensuring continued viability of tested and assessed systems.

To emphasise this further one GAI member states the following “The government is sleepwalking into potential issues. The market is slow to react, we are heading to a position where we will not be ready by 2029 to move to the EN standard (if we as ironmongers are ready the whole sector will not be). The supply chain is established in the way it interacts with BS 476. Is it a reasonable fear that the diversity in the supply chain will reduce, less competitive practices will follow then what is trying to be avoided will occur. There is a real risk if the fire door sector is not ready by 2029, to enable the supply chain to function seamlessly, it will cause delays in construction with inevitable ripples through the whole of the economy which the country can ill afford.”

More broadly, GAI emphasises that successful reform must be underpinned by alignment between regulation, industry practice, and competence. Strengthened enforcement, improved product information, and the integration of competence frameworks such as BS 8670-2 will be critical to achieving meaningful and lasting improvements in building safety. However, a question frequently raised by members relates to enforcement—specifically, who will be responsible for “policing” BS 8670-2. There is a strong expectation across the industry that oversight and accountability mechanisms should be clearly defined to ensure the framework is applied consistently and effectively.

GAI supports the overall direction of reform and recognises the need for a more robust and transparent regulatory framework. However, it is essential that these changes are implemented decisively, with effective

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QUESTION 11 (CONT'D)

enforcement and clear accountability across the supply chain. In particular, safety-critical products such as door hardware must be subject to rigorous oversight not only at the point of manufacture but throughout their operational life.

GAI urges government to take forward these recommendations to ensure that the reformed system delivers safer buildings, restores confidence in construction products, and prevents a recurrence of the systemic failures identified following Grenfell.



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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