



MHCLG (Ministry of Housing, Communities and Local Government) consultation: the Construction Products Reform White Paper and proposed construction product 'General Safety Requirement' (GSR) – response deadline 20 May 2026

Introduction

In May 2026, Electrical Distributors' Association (EDA) had a meeting with the MHCLG team dealing with the White Paper and the GSR. The meeting covered the distributor-related aspects of the two consultations above, in advance of EDA's written response. The main EDA written responses to both sets of consultative questions are shown below.

A) 'White Paper' consultation questions – main EDA response (the GSR consultation questions and EDA responses are at B) below)

Q1. What should be included in guidance to support industry to understand their responsibilities regarding 'products critical to safe construction'?

By broad definition, this is the most important aspect of the new regulatory regime and practical guidance will be needed to achieve the required regulatory and business outcomes. Sector-specific examples should be provided (as necessary) so that duty holders in the relevant industry sectors can envisage and understand what these products are/may be. This knowledge is not inherent in some supply chains and presenting a 'set of criteria' alone can be confusing.

Guidance in this area should therefore include:

- Worked examples (e.g. cabling, fire safety, fixings, MEP components).
- Clear responsibilities for manufacturers, importers, distributors and other duty holders
- Standard model templates for all the required documentation and product information requirements.
- Expectations around traceability (including batch identification, digital information, and retention periods).

This guidance should be developed with all industry and relevant sector duty holders, tested with SMEs, and developed and published well ahead of regulatory implementation.

Q7. Are there any specific roles or points where you think accountability is not clear? If yes, please explain your answer and include who should be responsible.

Implications for distributors: GSR product information obligations

To ensure positive regulatory and practical outcomes regarding product information and distributors, obligations to convey essential product information must be supported by guidance that clearly identifies the product information required. It should also show what 'reasonable' looks like, in terms of what distributors must do by way of 'checking' or other interactions with manufacturers/importers and their data.



Distributors must be able to rely on their UK product supplier (UK manufacturer/other product supplier) to supply accurate, complete and accessible* product information. Distributors should not hold a duty or liability regarding the quality and extent of information being provided by UK product suppliers, and there must be no confusion that manufacturers/product suppliers have the primary duty to provide the essential information to distributors, to enable ongoing provision to end users.

Specifically, the responsibility for maintaining digital product information accuracy and relevance over time will need clarification. This will become a crucial issue, prone to being overlooked early on.

*i.e. product information should be structured for ready integration with distributors' business systems and processes.

Regarding importing, where distributors take on a duty to relay essential data from importers or for imported products then clear, consistent official/industry guidance must be freely available to show the nature and scope of the information distributors are required to convey, when placing such products on the market.

With sufficient guidance, operating under the new regulatory framework, distributors and importers (and micros and SMEs in particular) can become sufficiently aware of the product information required. Conversely, without clear guidance on what information to expect, many distributors won't know the scope or nature of what's required, with the risk of rapid and significant regulatory and market failure, notably regarding imported products.

EDA would be pleased to contribute to the development of distributor-related guidance at both sector and industry level.

Q8. Do you have views on appropriate lead times or transition periods relating to specific reforms set out in this white paper?

Yes. We advocate:

- Phased implementation, prioritising high-risk CPs (products critical to building safety) first.
- Publication of secondary legislation and guidance at least 12 months before legal obligations take effect.

Q10. 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?

Yes, it is vitally important that the industry and our sector, builds upon that which already exists, rather than seeking to create new methods and costs. In our sector this is EDATA, which could be adopted as a model of good/best practice for other sectors to follow, and use of the ETIM data standard. ETIM is a well-established international standard data format for the technical and performance data for electrotechnical, HVAC & plumbing and construction products, adopted in over 20 countries and extensively used in many major European markets.

We also advocate the use of GS1 standards (GTIN) to provide unique product identification codes which facilitate information transfer between supplier, distributor and further along the supply chain.



**More information about EDATA and ETIM is provided in the response to Q.11.

Further, the need for required standards, certifications and any verifications should be uniform across the industry/sector and there must be market choice of certification/verification suppliers. Essentially, businesses should be required to “do what’s necessary - but not have to show it in multiple ways.”

Experience from other construction initiatives (such as contractor prequalification) shows that to optimise business costs, the industry should work with government to determine the necessary product certifications/standards/regime. Determining these should not be led by, or left to, the certification sector (certifiers should supply what is required by the industry and there must be market choice.)

Q11. Do you have any other useful information that you wish to share that is not covered elsewhere?

The Electrical Distributors’ Association (EDA) broadly welcomes the aims of White Paper, and we look forward to assisting in the practical implementation of the product information proposals in particular, along with the necessary guidance and sector training.

Supply chain competence

We note both in the White Paper and GSR consultation reference to “concerns about the technical competence of importers and distributors to ensure products meet regulatory requirements”.

We agree there is a need to raise product and installation competence across UK construction and maintenance services. Much of this can be via effective product-orientated CPD training, to an agreed standard of delivery, provided as a supplement to suitable underlying professional competence.

In the Electrotechnical Wholesale sector, we address competence through a City & Guilds-accredited training programme designed to enhance product knowledge among wholesalers. The programme consists of 10 product-specific modules, available via distance learning in both print and digital formats. These modules are regularly reviewed and updated to reflect legislative and other developments, ensuring that wholesalers can provide accurate, up-to-date information and advice to electrical installation contractors.

However, greater support is needed to make technical training more accessible and widely adopted across the industry. Currently, participation in CPD and other training programmes is optional and funded by individual businesses, which can be a cost barrier - particularly for smaller firms. The absence of government funding and signposting for technical product training further limits uptake. Reintroducing public funding for targeted courses and qualifications would significantly enhance training access and engagement.

Furthermore, embedding technical product knowledge into entry-level apprenticeships, including those in Trade Supply (distribution) is essential. As it stands, training providers often omit this essential content because it is not mandatory. Making it compulsory, notably in the context of a new regulatory regime, would help standardise and elevate product-related competence across the sector.



EDATA and ETIM

**EDATA is a successful product data pool for the UK electrotechnical (electrical and electronic equipment or EEE) sector.

EDATA is managed 'not-for-profit' by the Electrical Distributors' Association (EDA). EDATA contains in-depth manufacturers' product data including technical and performance data structured in line with the international ETIM*** standard (see below). The platform also includes provision for packaging, packaging materials and sustainability data. Data is accessible directly from the platform or can be integrated using APIs with wholesalers' business systems. There is a sustained focus on the quality of the product data uploaded into the EDATA system, to ensure that it is complete, up to date and in-line with best practice.

All product data hosted in EDATA is supplied and managed by the Manufacturers or Supplier, remaining under their ownership and their responsibility to maintain and update. Manufacturers who join EDATA benefit from a range of EDA support options to help create and manage their product data since many have limited access to specialist data management skills, and this support has crucial to EDATA's demonstrable success in our sector.

EDA would be happy to share our 'hands on' sector experience of enabling and delivering standardised product information.

***ETIM is a well-established international standard data format for the technical and performance data for electrotechnical, HVAC & plumbing and construction products, adopted in over 20 countries and extensively used in many major European markets. UK ETIM is managed by ETIM UK Ltd, a joint venture between the EDA and the Builders Merchants Federation (BMF). The governing body, ETIM International, works closely with CEN on DPP development and GS1.

B) 'General Safety Requirement' consultation questions – main EDA responses

Sections 6.5 – 6.9: Overarching safety duty proposal

Q2. Do you agree with the proposal set out above of an overarching safety requirement on economic operators?

Broadly yes, as long as: legal obligations are clear, universal and not overlapping. The practical operation of the regulatory requirements should be continually reviewed to achieve minimal direct and indirect compliance cost for businesses, with market choice as to how to comply with the relevant requirements/standards.

The GSR requirements should not become a charter for certification bodies to determine industry requirements or standards. This should be for the industry (the customers of industry certification).

Essentially, industry and, where needed, sector guidance to support and enable understanding and compliance with the GSR will be key to operational success.

Obligations on distributors to convey essential product must be supported by industry and government-backed guidance that clearly identifies the product information required.



EDA would be pleased to contribute to the development of this guidance at both sector and industry level.

Sections 7.12 - 7.16: Provision of product information

Q4. 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.

Additionally, we recommend:

- Clear expectations regarding accessibility, ensuring accuracy, and longevity.
- Guidance on system products, where performance depends on a combination of components.
- Clarification on how to maintain information when products are updated, rebranded, or discontinued.
- Proportionate requirements for lower risk products.

Adopting current industry solutions

More generally, to ensure success along the supply chain, importers and distributors should be part of the discussion, development and deployment of the various digital and other systems and processes needed to ensure the effectiveness of the GSR. In some sectors, product information solutions already exist and should be actively considered for their potential to assist with GSR product information requirements.

For example, in our sector, 'EDATA' is a successful product data pool for the UK electrotechnical (electrical and electronic equipment or EEE) product information, managed 'not-for-profit' by the Electrical Distributors' Association (EDA). EDATA contains manufacturers' product data (including technical and performance data) structured in line with the international ETIM standard (see outline below). Data is accessible directly from the platform and there is sustained focus on the quality of the product data uploaded into the EDATA system, to ensure that it is complete and up to date.

Construction products

There appears to be insufficient inherent knowledge in many parts of the industry about what is and is not a 'construction product' (CP). Criteria alone do not provide sufficient enlightenment across the wide range of products used in UK construction and maintenance, not all of which are CPs.

As such, practical guidance is required on how to readily identify which products are 'construction products' (CPs), along with a practical and effective way to identify which CPs are covered by designated standards etc. (so that by default, other identified CPs can then be assumed to be under the GSR). If not addressed, this issue could affect various duty holders in the supply chain, notably where products are wrongly 'assumed' not to be CPs, leading to compliance failure.

Safety critical products



More specifically, we support the focus being put on safety critical characteristics. The criteria for EEE products 'critical to safe construction', with any examples, will need prompt clarification and communication.

Sections 7.25 - 7.26 Obligations on Construction Product Distributors

Q10. Do you agree with the proposed requirements on distributors as set out above?

Yes, provided there is clear and adequate industry and sector guidance.

Obligations on distributors to convey essential product information – including for imported products - must be supported by industry and government-backed guidance that clearly identifies the product information required.

Distributors should provide an effective supply chain route for the key product information provided by product suppliers. However, distributors must be able to rely on their UK product supplier (UK manufacturer or other UK product supplier) to supply accurate and complete product information. Distributors should not hold any duty or liability regarding the quality and extent of information being provided by UK product suppliers, and there must be no confusion that manufacturers/product suppliers have the primary duty to provide the essential information to distributors, to enable provision to end users.

Regarding importing, if distributors take on a duty to relay essential data from importers or for imported products then similarly, clear, consistent official/industry guidance must be freely available to show the nature and scope of the information distributors are required to convey in order to place such products on the market.

With sufficient guidance, operating within a new regulatory framework, distributors and importers (and micros and SMES in particular) can become sufficiently aware of the information required. Conversely, without clear guidance on what information to expect, many distributors won't know the scope or nature of what's required, with the risk of significant regulatory and market failure, most obviously regarding imported products.

EDA would be pleased to contribute to the development of this guidance at both sector and industry level.

END

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