

Consultation Response: Amendment to the Building Regulations, Part D (Materials and Workmanship)

- **Organisation:** The Chartered Institute of Building (CIOB)
- **Document:** Amendment to Building Regulations, Part D
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Section	Type	Comment	Proposed Change
TGD D 1.1	Technical	Current guidance focuses heavily on new products. To support Ireland's Climate Action Plan, TGD D must address the reuse of reclaimed materials to reduce embodied carbon.	Insert a specific clause/pathway for the certification and verification of "fitness for purpose" for reclaimed components.
TGD D 1.2	Technical	Regulatory ambiguity for MMC/offsite manufacturing. Proper materials should be defined at the system level for volumetric units.	Cross-reference Agrément certification and the new CPR 2024 to provide a validation pathway for MMC system assemblies.
Reg. 4	General	"Workmanlike manner" remains too subjective. Poor workmanship is a primary driver of latent defects and "present bias" failures.	Link "workmanlike manner" to the oversight of a chartered professional (e.g., MCIQB/FCIQB) for high-complexity projects.
TGD D 2.1	Technical	Professionalisation of site management is key. Fragmented work practices often undermine the intent of Part D.	Update guidance to recommend site management competency be verified through membership of a relevant professional body.
General	General	Traceability is the primary barrier to identifying non-compliant or "un-certified" materials on site.	Advocate for the future integration of "Digital Material Passports" within Part D to ensure traceability from manufacture to deconstruction.

Summary Statement

CIOB has responded to the public consultation on proposed amendments to Part D (Materials and Workmanship) of the Building Regulations. Our submission advocates for a regulatory framework that supports Ireland's transition to a circular, low-carbon built environment. Key recommendations include establishing clear verification pathways for reclaimed materials to reduce embodied carbon and defining "proper materials" at the system level for Modern Methods of Construction (MMC). Furthermore, we called for the professionalization of site management,

linking the definition of “workmanlike manner” to the oversight of chartered professionals to ensure high-quality, resilient construction and reduce the prevalence of latent defects.