

Ministry of Housing, Communities and Local Government  
2 Marsham Street  
London  
SW1P 4DF

18 May 2026

To Whom It May Concern,

I am writing on behalf of the Chartered Institute of Building (CIOB) in response to the Ministry of Housing, Communities and Local Government's (MHCLG) consultation on the [Construction Products Reform White Paper](#). This letter acts as our formal written response to the consultation and our views on the competency of product installers.

As the world's largest and most influential professional body for construction management and leadership, we have a Royal Charter to promote the science and practice of building and construction for the benefit of society, a mission we have pursued since 1834. Our 50,000 members work globally in the development, conservation, and improvement of the built environment.

CIOB has been active in driving building safety reform, particularly following the publication of the Building Safety Bill – which became the Building Safety Act 2022 on 28 April 2022 and then came into force on 1 October 2023.

Our views are shaped by the work of our Quality Implementation Group (QIG) which exists to help CIOB respond to the changing regulatory environment and provide education and support to our members and the wider industry. The QIG also plays a key role in raising standards and promoting best practice in construction quality, providing resources to help further education in the field where appropriate.

CIOB provided a limited response to the [Construction Products Reform Green Paper](#) consultation in May 2025 which can be viewed [here](#).

Our response predominantly focused on the elements of the Green Paper concerning industry competency. CIOB has consistently advocated for policy that focuses on ensuring that those operating in the industry are equipped with the skills necessary to create safe, secure and high-quality environments for users and operators, including in the procuring, handling, installation and maintenance of construction products.

This further response to the Construction Products Reform White Paper will similarly provide a focused perspective on competency, as well as several other limited areas where we believe that our views have the greatest impact. It draws upon our submission to the previous Green

Paper; cross examining changes made in the White Paper and reiterating concerns where changes have not been made.

### Competency within the construction industry

In our initial response to the Green Paper, we stated there is an overarching need to ensure those responsible for the certification, use and installation of construction products understand the implications of their work and have undertaken training and qualifications that prove that they can complete their work to the highest standards available.

We recommended that “mandatory training should be required for those who are undertaking the testing and certification of construction products as ultimately these are the actors who are allowing products to be placed on the market for general use. In the same vein, training should be necessary for those who are marketing and selling the products to ensure that claims made are as accurate and representative of the specification and use of the product as possible.”

While we are pleased to see the inclusion of **Chapter 11** which is dedicated to competence and accountability within the new product testing regime, including the roles and responsibilities of those throughout the construction supply chain, we note that no reference has been made to mandatory training in any form. In fact, while **Section 11.4.4** references the need for clients to appoint appropriately competent parties, there is no reference to the responsibility for testing and certification bodies to ensure they appoint competent staff to carry out testing and certification of construction products.

Instead, the White Paper focusses on the competence of those placing products on the market. We feel that this is a missed opportunity to highlight the need for those carrying out the tests to be as competent as those procuring and installing the products. **We recommend that Government revisits Chapter 11 to strengthen the wording and include provisions on required training for those undertaking testing and certification of construction products.**

We do, however, note **Section 11.6.1** which states that MHCLG will “act to place a baseline expectation of competence on all manufacturers and others involved in designing, testing and manufacturing construction products”. Whilst we would be keen to see this put into place, it seems logical that this expectation would form part of this consultation and be subject to industry scrutiny. At present, this section gives no indication on what this baseline would include, how it would be defined or when further detail will be published. **We recommend that MHCLG sets out when this will be published and if it will be consulted on.**

In our response to the Construction Products Reform Green Paper, we also highlighted that not enough detail was provided on the scope of responsibility for individuals at each stage of the construction process and that catch-all terms were being used to define those who ‘install’

construction products, making it hard to understand exactly who would be required to undertake actions at certain stages or who was responsible for what.

We are pleased to see that the White Paper does provide more detail on responsibilities through Sections 11.4, 11.7, 11.8. We also welcome the further commitment in Section 11.8.4 that Government will go beyond existing regulation and oversight through the ongoing work on the regulation of professions and through the Single Construction Regulator. Aligned to this, we note the new regulatory system, or body will need careful consideration. Particularly in how it interacts with existing regulatory functions, and we therefore recommend any policy changes are fully 'mapped out' to consider the impact it might have on different regulators or their functions.

Lastly, we would like to reiterate the suggestion that was made in our response to the Green Paper, that Government make use of existing resources (training courses, qualifications, technical guides) produced by organisations like CIOB, the Code for Construction Product Information (CCPI), the Construction Products Association (CPA) and other trade and professional bodies. A great deal of work has been undertaken to improve competence, the industry just needs a push from Government to ensure this work is translated into results.

In August 2025 CIOB collaborated with the CPA, CCPI, Institution of Structural Engineers (IStructE) and the Royal Institute of British Architects (RIBA) to publish a free [Guide to Products Critical to Safe Construction](#) which provides designers, specifiers, and installers with the information they need to make informed decisions about construction products and includes examples and case studies to signpost industry best practice, such as the Code for Construction Product Information. This guide has been welcomed by the Office for Product Safety and Standards (OPSS).

We have also published an additional free guide, titled [Guide to Managing Safety-Critical Elements in Building Construction](#), with RIBA. This has been produced with the intention of increasing awareness across all sections of the industry of the need to bring a rigorous and structured approach to the design, construction and inspection of elements identified as potentially safety-critical.

CIOB will continue to have a broader view on the product safety regime in the UK and will update our standards and guidance as the regime evolves.

### Access to mandatory standards

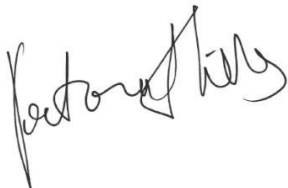
In our response to the Construction Product Reform Green Paper, we outlined that, it would be beneficial for those who act in roles where mandatory standards are required as part of their work to have free access to those standards. However, we also noted that requiring the British Standards Institution (BSI) to provide standards free of charge may limit their future potential to generate new content without subsidies being put in place to supplement lost income. We were

pleased to note the response from Government in Section 6.11.8, noting that reaching the point of free access to mandatory standards will take time and would require funding.

We also support the points raised in the White Paper, specifically in Section 2.5.7 which states that standards being behind a paywall creates additional barriers to entry for SME businesses. As before, we support the premise of making mandatory standards free to access but remain concerned about the adverse financial impact on the BSI.

Thank you for the opportunity to contribute to this consultation. We would welcome the opportunity to meet the team responsible for this consultation to discuss our feedback in more detail, and to explore how CIOB can support MHCLG in engaging with industry to ensure that all views are taken into account. We would also be pleased to continue supporting the development of the construction products regime where possible.

Yours sincerely,



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