
21/05/2025Via email to ConstructionProducts@communities.gov.uk**GS1 UK Response to: Construction Products Reform Green Paper 2025**

GS1 UK is a not-for-profit organisation that facilitates product verification and the traceability of products across industry supply chains. Each year, our 60,000 members generate over £1tn worth of turnover in the UK. GS1 standards create a global business language that identify, capture, and shares key data on over a billion products worldwide.

The construction industry is currently experiencing significant change. As product complexity increases and safety requirements become more stringent, fragmented data systems and proprietary solutions risk hampering progress and safety. The capability to uniquely identify and trace every product—from manufacture to installation and beyond - is critical.

Regulators should expect and enable industry compliance, with simplicity and efficiency by design. To achieve this, three key elements are necessary:

- Clarity – regulations must clearly state expectations: specifically what industry must do to conform
- Utilise existing systems – specifically, globally recognised systems, processes, and standards should be used to avoid cost and complexity
- Communication and implementation: a key enabler for economic growth, the construction sector needs clear deadlines and milestones, which enables adoption and does not delay decision making

Further details are provided in the responses below, we hope that these comments and evidence are useful.

Iain Walker

Director of industry engagement

GS1 UK

1. Do you agree with this problem definition? [Yes/No]. Please explain your answer.

Yes, we agree with the problem definition.

The UK construction sector faces significant challenges relating to fragmented supply chains and inadequate product traceability, meaning that too often, there are misleading product claims and a disconnect between what is ordered and what is delivered.

Product identification throughout the supply chain is GS1 UK's area of expertise; additional detail is provided in the relevant questions below.

Chapter 3: Our Vision of Reform

Overlap with other regulatory regimes

3. What, if any, other potential overlapping rules, regulations or guidance should we consider when designing the construction products regulatory regime?

Change is much needed and overdue.

Government regulations must reflect the global nature of construction supply chains and common working practices in other nations. The UK can learn from other nations that have faced similar challenges, and worked with industry to find solutions.

For example, in 2022 Sweden's construction industry adopted GS1 standards as a common product identifier. Backed by the nationwide construction contractors (NCC, Peab, Skanska, JM, Veidekke, Bygghandelsindustrierna, Bygghandelsindustrin and BIM Alliance), this decision enabled traceability in the construction process as unique data can be linked to each product in the digital information flow.

This is an example where GS1 and industry have come together to implement common standards across the construction sector

Chapter 6: Product Requirements – A Regulatory Approach Based on Safety Risk

Product requirements overview

7. Would the approach detailed above enable a proportionate approach to regulating the safety of products not covered by a designated standard or subject to a technical assessment? [Yes/No]. What other approaches could be taken, drawing on evidence from EU Member States where relevant.

No, this must go further, specifically in relation to the proposed requirements around product labelling and the need for standardised digital product information.

For any product to be considered safe, it must first be uniquely identified. This should be done with an industry wide approach such as via GS1 standards, which can then share data to cross-connect to other trusted sources – enabling verification.

The unique identification of products is a core pillar of GS1 standards, with the most common being the Global Trade Item Number (GTIN or barcode). Our standards already uniquely identify more than a billion products globally. This ability to uniquely identify products globally, as led to the use of GS1 standards in multiple supply chain systems and safety checks.

As highlighted in question 3, Sweden has worked to standardise this across the construction industry, using GS1 standards as a common identifier – which applies across the vast majority of construction products regardless of if they're covered by a designated standard or technical assessment.

Using GS1 standards, enables access to real-time, dynamic product information—including safety documentation, certification, installation guidance, and maintenance instructions. For example, if a product were to change safety category, or be subject to a technical assessment, this information can be updated in real-time without having to recall the product.

8. What are the implications, if any, that could arise from introducing obligations on importers and distributors to check product information and associated responsibility for the storage and transportation of construction products under a general safety requirement? If there are any implications, how could they be mitigated and managed?

The potential risks of the system include severe delays, false positives on product identification and safety, and the risk of increasing barriers to export.

Simplifying data flows and sources of trusted data is key, and ensuring importers and distributors have access to necessary information is crucial. Globally interoperable standards can facilitate this information exchange.

These challenges have been addressed using GS1 standards, which provide commonality and enable businesses to communicate effectively. In the retail sector, ISO-compliant standards help with smoother importing and mitigate potential issues. Sweden and New Zealand have successfully implemented GS1 standards, enhancing traceability and information sharing.

Adopting similar standards in the UK can simplify business practices for importing and exporting regulated construction product

10. What requirements should apply to products and systems that are critical to safe construction?

Products and systems essential for safe construction require the highest levels of traceability, identification, and compliance assurance. Without standards, inefficiency flourishes: locating information is challenging, non-compliance rises, and unsafe products infiltrate the market. We propose three specific and crucial requirements:

- Greater specificity on how digital records and product identification will be implemented
- Standards for validating the certification or accreditation of products
- Standards for accessing data should be open and freely accessible

Third-party verification of products is vital for safety-critical items. Certification by independent, accredited bodies provides an additional layer of assurance that products meet regulatory and performance standards. Associating such certification with the product's digital identity ensures that only verified products are utilised and that their compliance status remains accessible and current.

Given the significance of construction products in this category, it is crucial that all parties involved have access to comprehensive and timely information throughout the entire lifecycle of these products. We strongly advocate for a requirement that these products have a globally interoperable and dynamic system for accessing product data.

Strengthening obligations on how products are selected and installed for all products

11. What types of requirements could be placed on those responsible for building works to enable them to meet safety obligations in relation to the specification, selection and installation of construction products?

It is essential to implement requirements that promote accurate product identification and traceability. This information should be accessible on site, and that those responsible and accountable for building works have access the critical information.

Government must be clear with producers as to how they comply with the new requirements, and their methods for communicating key pieces of information to those on site.

Those on site must have an industry wide standardised way of accessing this information, so that industry is working to a simple and common practice.

Product information and labelling

17. What information would support you to choose the best product that will be safe in its intended use and its normal or reasonably foreseeable conditions of use?

Consistent and accurate product information is crucial for making safe decisions in construction. It must also be accessible, as ease of use is key.

Decision-makers need real-time access to trusted compliance certificates, test data, installation instructions, and performance specifications – though for example, a simple QR scan.

Sharing this data accurately is vital. Digital labelling using GS1 standards connects each product to an online source of verified information, ensuring on-site teams always have the latest data, reducing the risk of errors.

The Code for Construction Product Information (CCPI) reinforces the importance of accurate and unambiguous product data. GS1's role in uniquely and interoperable identifying products supports CCPI's focus on clear labelling and traceability—ensuring that the information accessed digitally is trustworthy and linked to the correct product.

Marketing

18. Are you aware of instances where current marketing legislation has been insufficient to take action against misleading marketing practices? [Yes/No]. If yes, please provide details.

Yes. There are many examples where products such as insulation and other building materials were marketed as suitable for high-rise buildings, despite concerns about its fire performance.

This could have resulted in construction companies choosing these products, without access to the relevant performance information.

Digital labelling based on GS1 standards can prevent such claims and allow for product information updates. Unique product identifiers provide real-time access to verified information like compliance certificates and testing data.

Unlike static labels, digital labels can be updated post-market to reflect changes. If a product has misleading claims, its digital label can be amended or flagged, alerting users and supporting enforcement actions. Importantly, this can be done throughout a products lifetime, not just on order and installation.

This can help improve productivity and safety if the information can be accessed on site through a simple scan of the product.

23. What information would it be useful to include on a construction library and who would it benefit?

We support creating a construction product library with clear, verified, and up-to-date information for product specification, selection, installation, and maintenance.

Useful data fields include product specifications, certifications, safety data sheets, environmental performance, test results, installation instructions, maintenance guidance, and batch traceability.

Each product should have a globally unique identifier (such as a GTIN / barcode, or via the use of a QR code) to ensure consistent identification across multiple systems and data sources – such as the Manufactures Information Hub, which is already underpinned by interoperable standards. This approach also aligns with the EU's Digital Product Passport initiatives, supporting circular economy goals, traceability, and regulatory enforcement.

Digital solutions

24. What benefits or challenges could digital labelling or EU Digital Product Passports bring?

We advocate for digital labelling in construction for dynamic, comprehensive, and up-to-date product information, ensuring safety, compliance, and efficiency.

Digital labels enable verifiable credentials, linking product claims to certification records, and dynamic recall notices issued digitally. Unlike static labels, digital labels using GS1 standards can grant immediate access to real-time information like installation guidelines, safety certifications, maintenance instructions, and environmental impact data.

This ensures stakeholders have current and relevant information, enhancing decision-making and reducing risks associated with outdated data. GS1 standards address concerns about incompatible systems by ensuring interoperability across platforms and stakeholders, facilitating seamless integration and promoting a cohesive information-sharing environment.

The EU's Digital Product Passport aims to standardise product information for sustainability and circular economy objectives, and GS1 standards align with these developments, offering a robust framework for globally unique, interoperable, and non-proprietary product identification.

Traceability

25. Are the proposals we have outlined to improve access to product information enough to support traceability? [Yes/No]. Please explain your answer.

These proposals should only be considered a starting point, and many more key decisions are yet to be made. Industry needs additional clarity, specifically on

- 1) A common standard of product identification (GTIN)
- 2) A common standard of location capture (Global Location Numbers)
- 3) A decision on the use and inclusion of digital labels (QR codes powered by GS1 standards)
- 4) What common information should be captured and provided at product level, that those people responsible for building safety need access to

There is currently a real risk that ambiguity in the proposals could lead to a plethora of proprietary systems which lock in sections of industry. This would be damaging for data sharing and concurrently growth in the sector.

GS1 standards are used globally to uniquely identify over a billion products worldwide. This level of specificity and interoperability is essential to meet the traceability ambitions of the reform.

Product marking

26. Should digital labelling be available as an alternative to the UKCA mark? [Yes/No]. Please explain your answer.

Yes, a digital option gives manufactures more flexibility when deciding which products to export vs keep in the UK market, without having to run separate production lines. It also allows for changes to be made and updates issued on products, even when a product may already be in circulation.

Applying the same principle in construction allows a product to carry the UKCA compliance data digitally, while also connecting to installation guides, testing certificates, and sustainability data. This digital flexibility enables updates even after the product is in circulation - something a static UKCA label cannot do.

Digital labelling doesn't replace assurance—it strengthens it through transparency, traceability, and adaptability.

34. Should mandatory standards be free to access? [Yes/No]. If yes, please provide suggestions on how this could be achieved, including funding.

Standards should be open and interoperable for use across industry, and free from being locked into proprietary systems.

Chapter 9: Regulating the Market - Overview of the functions of the national regulator

Roles and responsibilities of the regulators

43. Which regulatory authorities should play a role in ensuring compliance with our proposed obligations around product use? Please explain your answer.

Compliance with obligations around product use should be overseen by a collaborative framework involving the OPSS, Building Safety Regulator (BSR), and

Local Authority Trading Standards (LATS). Each has a complementary role—OPSS providing market surveillance, BSR enforcing building safety outcomes, and LATS handling local enforcement and site-level issues.

For these bodies to effectively monitor compliance, they need access to accurate and unambiguous product information. This is where CCPI and GS1 standards are vital: assigning each product a unique identifier ensures that no two products are confused or misrepresented.

Surveillance throughout the whole system

44. Do you believe the approaches to reactive and proactive surveillance as set out will be effective in monitoring the market? [Yes/No]. Please explain your answer and note any additional approaches you think we should consider.

Yes. Effective surveillance requires interoperability across digital systems. Without a consistent method of product identification, regulators and enforcement agencies will struggle to track or verify construction products across the supply chain.

GS1 standards provides a globally unique identifier for each product, ensuring consistent identification from manufacturer to installation. This enables regulators to quickly confirm what a product is, where it has been used, and whether it complies with safety or regulatory requirements.

In addition, using an interoperable standard to identity and access information helps avoid proprietary systems, where information critical to enforcement may be difficult to access.

Interventions and sanctions

48. What, if any, additional measures should we consider to strengthen the powers of regulatory authorities, beyond those we have outlined in this chapter?

We recommend the adoption of GS1 Web Vocabulary to support structured, machine-readable publication of product information. This allows regulators to automatically access and interpret product data from manufacturer and supplier systems, improving enforcement speed and accuracy.

By enabling consistent, real-time access to product specifications, certifications, and compliance claims, GS1 Web Vocabulary reduces administrative burdens and supports more proactive and data-driven enforcement.

Alongside this, a centralised digital access point using GS1 identifiers could serve as a trusted registry of products placed on the market. This would allow enforcement bodies to validate product status instantly and ensure that all parties are referencing the same product.

Chapter 10: Environment and Sustainability - Addressing environmental aspects for products covered by a designated standard

Further actions to facilitate environmental aspects of construction products reform

55. Do you support the proposed actions above? [Yes/No]. Are there any other actions that could be taken and by whom (e.g. government/industry)? Please explain your answer.

GS1 standards are used to support similar schemes and actions in several nations across the world – at the heart of these is identification underpinned by common standards.

Chapter 11: Further Evidence Requirements

57. What direct or indirect costs could yourself, businesses and wider society have due to our proposed reforms?

Throughout this document we have repeated the need for additional clarity in these reforms. If such clarity is not provided, the costs to industry are significant. This could involve

- 1) Import delays
- 2) Materials shortages
- 3) Base cost increase
- 4) Proprietary systems
- 5) Confusion on product claims / compliance
- 6) Delay to projects

Given the importance of the construction sector to the UK economy, the potential impact of growth is significant.

GS1 UK's experience in other sectors shows such costs can be managed and reduced significantly where pre-existing global standards are adopted. These are open, non-proprietary and in widespread use globally, which helps mitigate the risk of fragmented or duplicated approaches across industry.

58. Is there anything else you would like to inform us of, that you have not been able to through other questions in this publication?

Regulating the construction sector in this way is welcome and done well, can empower industry to implore when we "make the right thing the easy thing". In our experience, even superficially simple tasks such as product identification in a supply chain are complex operations.

GS1 UK looks forward to working with you and sharing our expertise in this area to help create additional clarity for regulators, industry, and to help deliver this important policy.

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