The voice of our sustainable built environment

Consultation: Construction Products Reform Green Paper 2025

May 2025

The UK Green Building Council represents the voice of the UK's sustainable built environment industry. We are a charity powered by more than 650 members from banks, large estate owners, housebuilders, and manufacturers to innovative startups, universities, local councils and government departments - all working to transform the built environment in the face of the climate, nature and cost-of-living crises.

This is a response to Chapters 7 and 10 of the Ministry of Housing, Communities and Local Government's consultation on construction products reform, seeking views on how the sector can have a role in improving the sustainability and circularity of construction products.

UKGBC welcomes the opportunity to respond to parts of consultation which invites input into the digitalisation and traceability of data for building products and how environmental data can be included to encourage reporting. Industry has been developing environmental credentials of construction products and exploring how best to report and use that data to inform decisions within the design and procurement of a building to achieve carbon-reduction and broader environmental goals. The opportunity to include the environmental credentials as mandatory would help signal to the market that the measurement and reporting of this data is important and enable project teams to make more informed decisions on the environmental impact of the materials they are selecting.

Digital tools can support better transparency of data and help practitioners make decisions to reduce environmental impacts and waste. Mirroring the digital product passport requirement and other regulations from the EU will help manufacturers streamline their reporting whilst expanding the transparency of data available on construction products. The digital product passport could also support better traceability of products by acting as a live document which is machine-readable and can be used through the design, in-use, and end-of-life of the product. With this information decisions can be made on the environmental impact, and circularity, helping reduce waste from the construction sector.

The government should build on the work of industry to enable digitalisation and traceability of construction products through a collaborative approach. Utilising solutions already available and in-use will avoid duplication, ensure alignment with industry, and enable rapid progress to be made where work has already been started. Considerations should also be taken to ensure the data provided is accurate and verified, whilst not being an additional cost burden to manufacturers and SME's which could slow adoption and limit the market.

Consultation response

Chapter 7: Clear accessible information

A construction library | Question 23: What information would it be useful to include in a construction library and who would it benefit?

Alongside the information needed for fire safety, including test results and declarations of performance, additional information should be included to support sustainability and help specifiers identify the sustainability credentials of products. This data could include EPD data in a consistent format, in accordance with BS EN 15804, and other environmental impact data, such as impacts on nature and biodiversity which occur through the supply chain. The information for certifications such as BREEAM, WELL and SKA could be included to help the product selection and design process. As well as circularity information including assembly, disassembly, repair and maintenance, and appropriate end-of-life options such as reuse or recycling for the material or product. This would help facilitate longer lifespans of materials and products, reducing environmental impact and waste. Work is being done to align circularity data points by both CEN/TC 350/SC 1 and the Building Passport Alignment Project, the government should look to these efforts to coordinate with ongoing standardisation. This information can be found in Digital Product Passports (DPPs) which should be included within the construction products library.

The data included should be third-party verified and machine-readable to support use of tools for modelling and tracing construction materials. These should include a unique identifier for the product which is interoperable between different data modelling tools or tracking systems.

Libraries similar to this already exist for sustainability information within the built environment, with companies providing these libraries or companies that have their own libraries in-house (e.g. Firstplanit, 2050 Materials, One Click LCA's Material Compass, and the ASBP EPD library). The Built Environment Carbon Database (BECD) also collects product and asset-level data to be the main source of carbon estimating and benchmarking for the industry. There could be an opportunity for collaboration or alignment here to not duplicate efforts.

Digital solutions | Question 24: What benefits or challenges could digital labelling of EU Digital Product Passports bring?

Benefits:

- Transparency on data and consistency of format (both within the UK and between the UK/EU markets). This would help with innovation and digitisation of the industry as a whole, as there would be a structured database that platforms and tools could integrate with.
- Understanding of the lifecycle impact of a product, including environmental information such as embodied carbon, health and safety data, and circularity information on material composition, reuse, recycled content etc.

- Information on correct product installation, and details on maintenance and repairs - leading to longer product lifespans.
- Information on what to do at the end of life for the product, including waste hierarchy, options for reuse and recycling, and correct disposal.
- Having information on testing, certifications, and where it has previously been used will make the reuse and retention of products easier.

Challenges:

- Ensuring consistency of data and attaining third-party verification.
- Costs of producing the data required by manufacturers - EPDs are already expensive for manufacturers, so this might require additional support.
- Relating to cost, there would also need to be consideration of the threshold for inclusion for products - if this is too high, then the database risks excluding some of the more innovative and promising products and solutions.
- Development of a rigorous methodology for keeping data up to date in all circumstances (i.e. if a new EPD comes out, products get discontinued, or the company stops operating).
- Data management and ownership protocols will be required for a product's lifespan, alongside methods for sharing the data with those who need access to it.
- Understand how the data can be input into existing tools, such as those performing Life-Cycle Analysis (i.e. OneClick, Preoptima, eTool), material tracking platforms (i.e. QFlow), BIM software applications, material selection platforms (Firstplant, 2050 Materials), or existing digital product platforms (i.e. Madaster, Circuland, Upcyclea). With any digital solution, integration will be key.

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

No. This proposal needs to increase transparency of what is in a building material or product. Traceability means knowing where the product is installed and who owns the building with those products in it. This should be integrated into the procurement process and during the handover to the asset/facilities management team of the building. Data management and ownership protocols are needed for a product's lifespan, with details on how to share the data with those who need access to it, as well as ensuring the information is updated regularly. As discussed in previous questions, the data provided for this needs to be standardised and interoperable between different tools and software to be useful.

It should not fall on the manufacturer to trace their products – digital software solutions are developing methods for data transparency throughout the supply chain and project lifecycle (including carbon tracking platforms, building and materials passport platforms, and material tracking platforms e.g. QFlow).

Audits (pre-demolition, pre-redevelopment, and strip-out) would also help ensure this information is kept up to date and support understanding of which materials and products have been used and which could be reused or shared on a reuse market.

Chapter 10 – Environment and Sustainability

Environmental aspects for products | Question 53: Should these environmental aspects, as reflected in the revised EU-CPR, cover products subject to a designated standard or a technical assessment? [Yes/No]. Please explain your answer.

Yes. This should not be a cost burden and should not create a barrier to those entering the market. It is aligned with what the EU are implementing, which is important to support manufacturers by providing consistency across the market to avoid additional burdens and allow for the flow of materials between the EU/UK markets. This alignment also allows for easy comparison between products within the materials specification and selection process for design and procurement teams.

Products covered by a general safety requirement | Question 54: What, if any, approach might there be to measuring and/or mitigating the environmental impacts for products brought into the regulatory regime through a general safety requirement and should this be mandatory or voluntary?

Mandatory reporting of environmental impacts (such as EPD data) in a consistent and aligned format, such as through a digital product passport and/or the construction products library. Within this, it should be mandatory to state in this same source where the data is not available (i.e. it should be mandatory to disclose what data you have). This will help increase the transparency of where data is and is not available for products. How this data will be verified and updated should be considered and clarified.

Embodied carbon should be considered when deciding which data should be mandatory. If the Government were to support Part Z and regulate embodied carbon, then there would be a need to include embodied carbon data as mandatory to report. This is found within EPDs and is already considered good practice within industry and mandated in other countries. This could be linked to and support the uptake of the BECD to report the embodied carbon of products and completed buildings.

Further actions to facilitate environmental aspects | Question 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.

No.

Solutions already exist to support life-cycle assessments of products (i.e One Click LCA, eTool) and make the EPD generation process easier (i.e. Emidat and Pathways). Industry does not need another life-cycle assessment tool. The government should support Part Z

(regulation of embodied carbon), which will increase the uptake of life-cycle assessments and grow the market for the tools which already exist. They should also consider the support needed for manufacturers and SME's to provide the data for life-cycle assessments and to have them verified through tools and services, which may already be available.

Deposit-refund systems and requirements for manufacturers to provide spare parts could help promote circularity and reduce waste. Policies should also be explored for manufacturers to have an end-of-life plan to ensure the product remains in circularity at the highest point of the mitigation hierarchy possible, e.g. refurbishment, reuse, then recycling. This should encourage manufacturers to have a take-back scheme where possible or provide options through other parties for this to be delivered. The information for this can be included with the digital product passport.

Databases of reused products already exist within industry which also provide brokerage services of reuse materials, and further act as a platform to buy and sell these materials (i.e. Material Index, Excess Material Exchange, Material Reuse Portal). A database of reused materials could be integrated with the construction library in Section 7 to create alignment with industry and support the market in progressing - it is essential to work with industry to ensure government does not duplicate efforts. This would help ensure longevity and, if funding changes, that industry is able to continue with the progress made. Digital product passports would also enable a database (government or otherwise) to function by providing accurate information on the product and its lifespan (if the traceability of the product has been carried out) and certainty to the buyer of what they are purchasing and which standards and certifications it meets.

Government procurement policies are a strong enabler and market signal – they should be used to encourage the uptake of these activities. Government procurement strategies should lead by example by requiring reused materials or feed materials reclaimed from buildings to be included in reuse databases and platforms. The strategy should also require use of products which include environmental and circularity data to help increase the uptake of requirements to provide this information.