

August
2025

INSIGHTS ISSUE 13



**MUST
READ
CONTENT**

The text 'MUST READ CONTENT' is written in a large, bold, pink sans-serif font with a dark blue drop shadow. It is centered over a background image of a stack of papers and folders, with a teal gradient at the bottom.

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- ✓ Auto-generate product data sheets

Our customers: BATHROOMBRANDS VADO AQUALISA obode

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WHAT THE 2025 COMPREHENSIVE SPENDING REVIEW MEANS FOR THE BATHROOM INDUSTRY

FOREWORD



Welcome to the latest edition of Insights. This foreword is particularly poignant for me, as it

marks my final one as Chief Executive of the Bathroom Association.

Over the past years, I've had the honour of working alongside an extraordinary membership, a dedicated and talented team, and stakeholders whose shared passion for this industry has driven meaningful progress. The momentum we've created has laid the foundation for my next chapter—and it's a legacy I hand over with pride.

I'm thrilled to pass the baton to Daphne Doody-Green, who joins us as the new Chief Executive in September 2025. I am confident that under her stewardship, the organisation's influence will deepen across the supply chain, and our partnerships with government and industry will continue to flourish.

In this edition of Insights, we again tackle some of the most pressing developments affecting our sector. In the 'Reducing our Environmental Impact' section, we analyse the Independent Review of Defra's Regulatory Landscape, which seeks

to balance growth and environmental protection. We also describe the current state of play with the government's packaging reforms and how the Association is working toward a fairer solution for our sector.

On 'Raising Standards', we explain the challenges and opportunities presented by the NHS Estates team for alternative fitting testing methods, and describe our proactive stance in developing new harmonised standards under the EU CPR.

This edition also outlines the 'Legalise Loos' campaign and how the Comprehensive Spending Review will impact the bathroom industry.

All of this is complemented by our Economic Barometer and Political Barometer, which help bring clarity to a fast-moving environment, giving you the tools to make informed, strategic decisions.

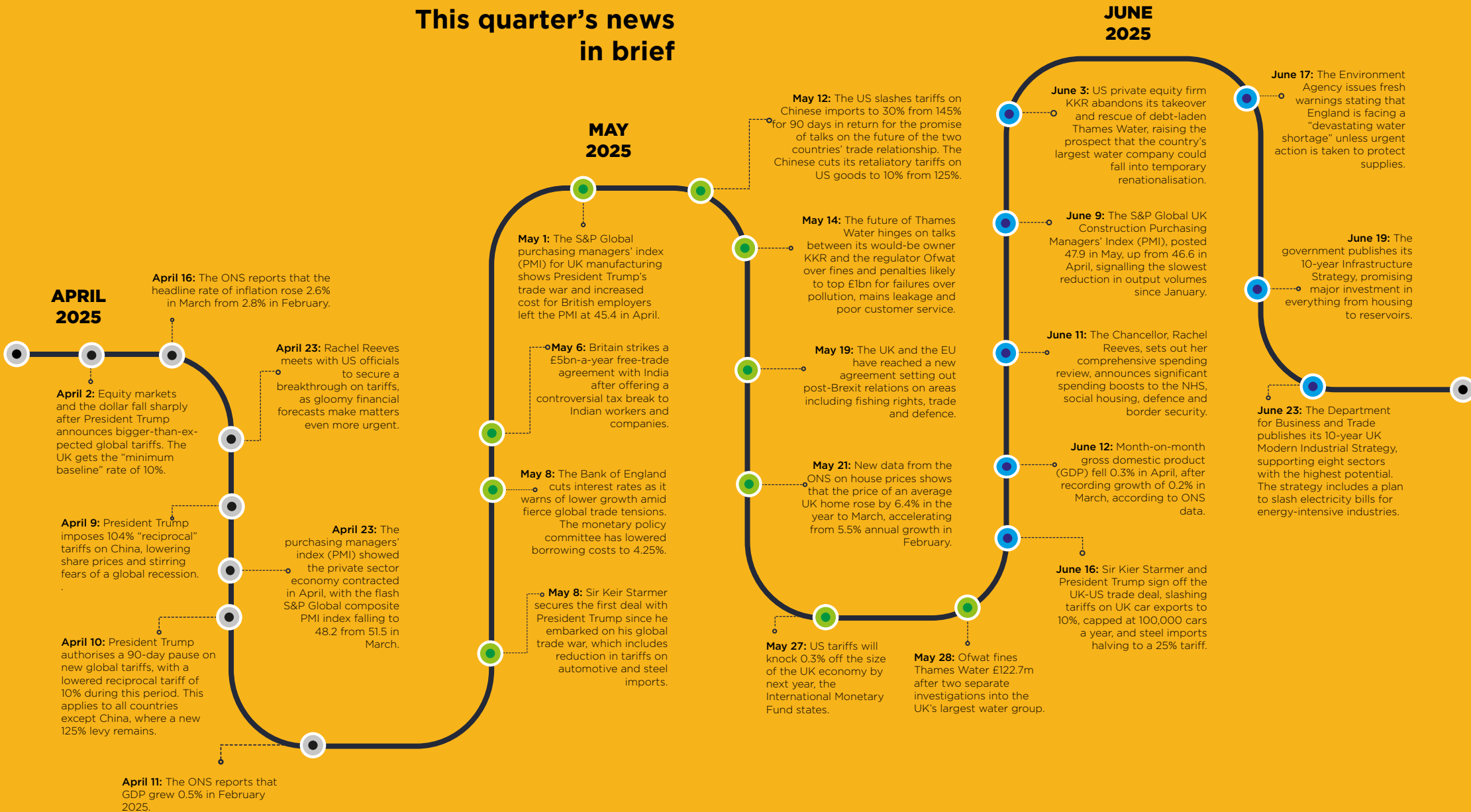
As always, I remain deeply grateful to our collaborators and data partners, including CPA, MRA, and our political analysts at Inflect. Above all, my thanks go to the brilliant Association team who have been instrumental in shaping this publication and so much more.

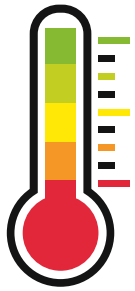
It has been an honour to serve this industry. Thank you for the trust, the support, and the shared commitment to making it stronger.

Tom Reynolds, Chief Executive

ALMANAC

This quarter's news in brief



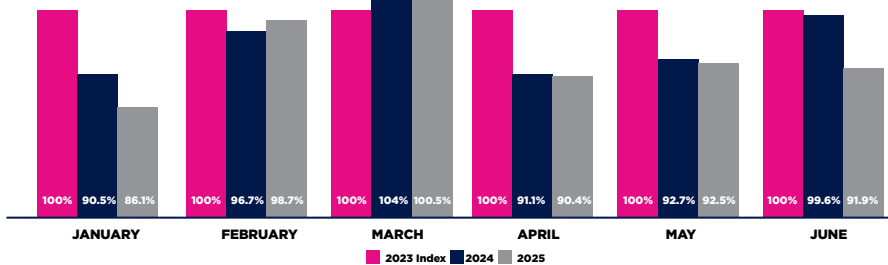


ECONOMIC BAROMETER

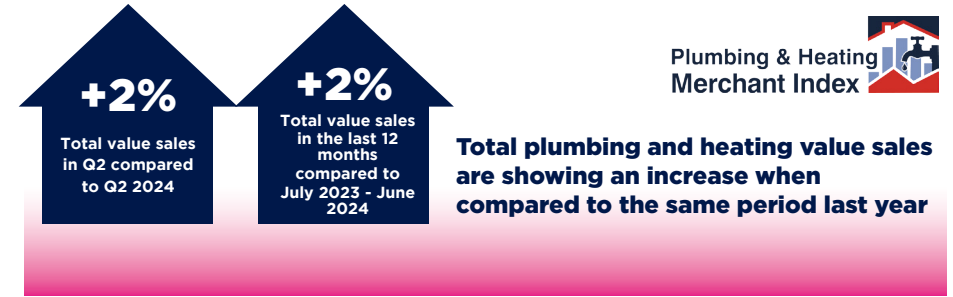
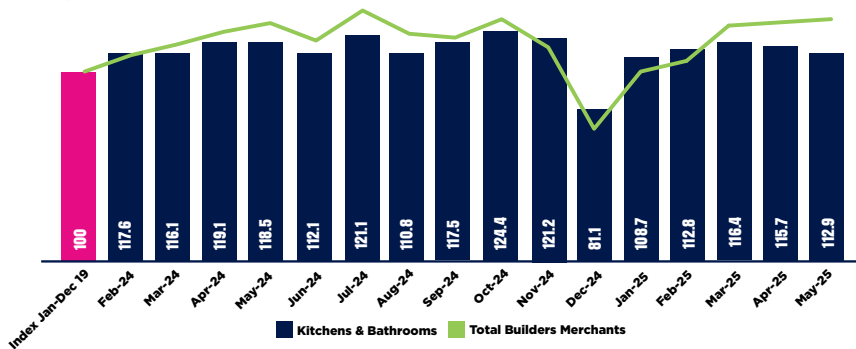
A summary of lagging, leading and coincident indicators across a range of industry and economic metrics, designed to give an overview of how the bathroom market has performed and how it may change in the future.



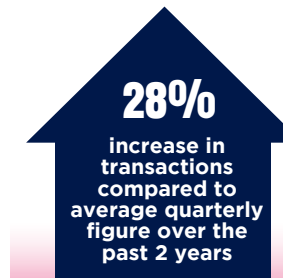
After a positive start to the year, turnover stats submitted by Association members show a disappointing Q2 ...



The Kitchens & Bathrooms category has **fallen slightly** behind Total Merchants in the past 3 months



NHBC reports that **29,356** new homes were registered to be built in Q1 2025

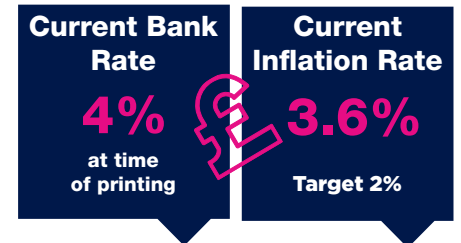


The RSM Housing Tracker shows the stamp duty deadline triggered a **surge** in UK property transactions in Q1



Bank of England

The bank interest rate is at its **lowest** level since March 2023



+4.1%

**Overall Consumer
Prices Index**
12 months to June 2025



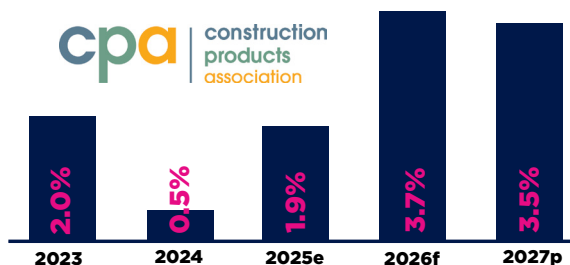
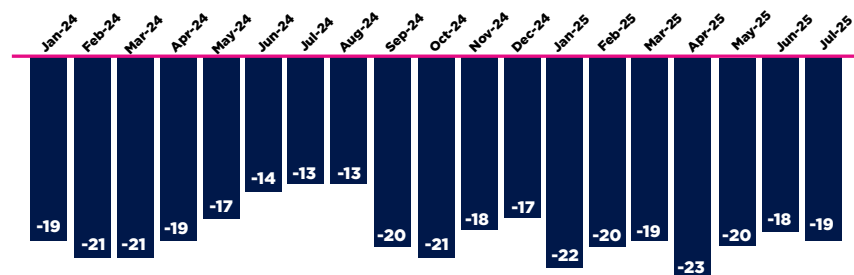
Transport—especially motor fuels—was the main driver of the monthly increase in the Consumer Prices Index, which includes owner occupiers' housing costs (CPIH)

The UK employment rate for people aged 16 to 64 years, March to May 2025, is above estimates of a year ago, and up in the latest quarter.

75.2% UK Employment Rate
aged 16-64yrs



Consumer confidence slipped by one point in July, prompting analysts to believe that consumers are adopting a cautious outlook amid signs of potential economic turbulence.



The CPA Construction Industry Summer Forecast continues to point to **cautious growth** in UK construction but warns that economic risks and uncertainties have risen considerably since their previous forecast.



LLOYDS BANK

52%
Overall
Business
Confidence

The Lloyds Bank Business Barometer shows that overall business confidence rose by one point in July. This increase is largely driven by an 11-point surge in service sector confidence, which offset declines of 4 points in manufacturing and 6 points in construction.



The International Monetary Fund has raised its global growth forecast for 2025 by 0.2 percentage points compared to its April 2025 projection.

Global Economy
Forecast Growth

3%

UK Economy
Forecast Growth

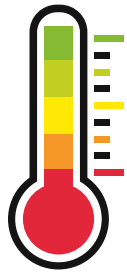
1.2%

CBI

The Confederation of British Industry Industrial Trends Survey (July 25) reports that conditions in UK manufacturing remain challenging, with many firms reporting subdued and unpredictable demand.

-6%

Expected output
volumes 3 months
to Oct 25



POLITICAL BAROMETER

An analysis of the current political climate and the forces shaping the national conversation, including key announcements since the start of the year and the major developments to watch in the months ahead.

REFORM UK POLLING AHEAD

The past three months have seen support for Labour slump further, while Reform UK have soared in the polls.

At the local elections in May

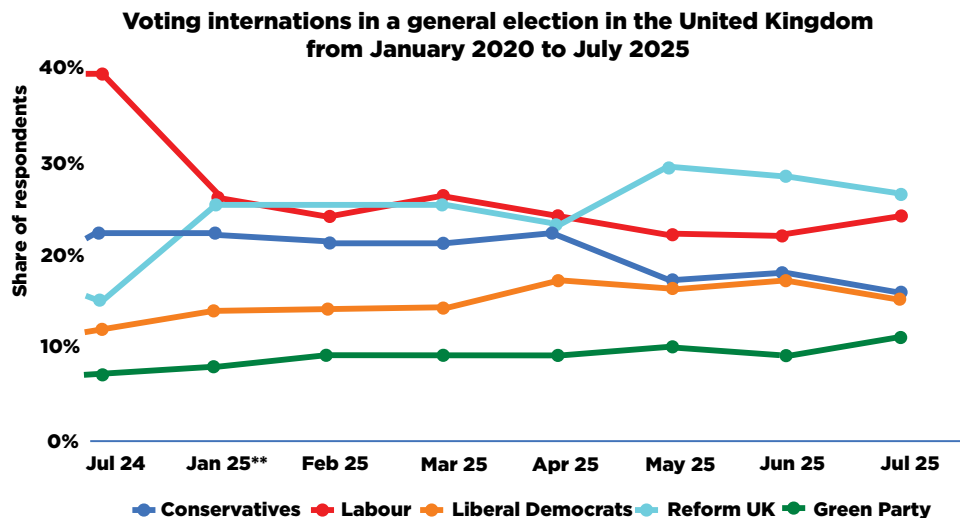
2025, Reform won 677 seats, while Labour lost 187 seats and the Conservatives lost a huge 674 seats. The Liberal Democrats also performed well, picking up 163 seats.

Reform UK gained control of 9 councils across the country, as well as returning

two Metro Mayors in Greater Lincolnshire and Hull & East Yorkshire.

Why it matters: Mayors can influence water efficiency standards, oversee investment in housing and retrofit schemes, procurement rules, and plumbing skills training, all of which shape demand for bathroom products and services.

While Reform UK's national platform focuses on deregulation and cutting green subsidies, its mayors now have significant influence over local housing delivery, infrastructure planning, and workforce policy. The sector should watch closely how these powers are used.



A BUSY QUARTER

The Government has released a series of flagship strategies (Ten-Year Infrastructure Strategy, Spending Review, Industrial Strategy, and Cunliffe Review) alongside two major Bills on planning and devolution.

These documents signal the Government's long-term intent: to reshape how infrastructure is funded, how housing and water challenges are integrated, and how powers are shared with regional mayors.

But delivery may prove trickier than anticipated. The Government's early defeat on welfare reforms suggests backbench resistance could slow or reshape legislation.

Government Unveils Small Business Plan

The new strategy promises action on late payments, regulatory reform, and access to finance. It includes planning changes to accelerate housing delivery, new funding for retrofit and energy efficiency training, support for SME exporters, and a push on digital adoption.



WATER ON THE AGENDA

DROUGHT SHINES THE SPOTLIGHT ON WATER EFFICIENCY

This quarter's dry weather has pushed four regions into official drought status, putting water scarcity, and, by extension, water efficiency firmly back on the political map. In Greater Cambridgeshire, Lib Dem MP Pippa Heylings has called for a ministerial roundtable on how water constraints are stalling housing growth. We're in active discussions with parliamentarians to table a debate on enabling sustainable development in water-stressed areas through more stringent water efficiency measures.

Why it matters: Water stress is now a recognised constraint on planning, development, and retrofit, especially in growth regions suffering water stress. The policy window is opening.

INDEPENDENT WATER COMMISSION REPORTS

The full findings of the Independent Water Commission review of the water sector (The Cunliffe Review) was published. The government has accepted all 88 of the recommendations, and will bring forward a Water Bill next year.

WHAT SHOULD MEMBERS PREPARE FOR IN THE FORTHCOMING WATER BILL?

Strategic Reform: A new National Water Strategy and regional system planners to better align housing growth, infrastructure, and water availability.

Regulatory Overhaul: Creation of an integrated water regulator for England, combining Ofwat, DWI, and environmental functions.

Product Standards: Expansion of Regulation 31 testing capacity to support compliant fittings and materials.

Water Efficiency & Reuse: Introduction of compulsory smart metering, tariff reform, and a new framework to scale up water reuse in homes and buildings.

Supply Chain Practice: A push for better procurement and contracting standards between water companies and suppliers.

PUBLIC TOILETS BACK ON THE AGENDA

At a recent parliamentary drop-in organised by the Bathroom Association, we engaged with ten cross-party parliamentarians on the urgent need for improved public washroom facilities. This follows ongoing discussions with the responsible Minister, Alex Norris MP.

Momentum is growing. A recent Commons debate on Changing Places toilets brought renewed attention to the issue, with more MPs raising constituent concerns about the lack of accessible, quality public toilets.

Analysis provided by Jonathan Connolly, Account Manager, [inflect](#)



dissident



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DIFFERENT IS BETTER THAN BETTER

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let's fix it together.**

NSF

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- 52% of homeowners have never heard of the regulations
- 80% never check if fittings are compliant
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REDUCING

ENVIRONMENTAL

IMPACT

April 1: The Bathroom Association secretariat met with Defra's Martin Woolhead and Katie Smith, who lead the water efficiency team, to discuss Mandatory Water Efficiency Labelling, leaky loos and AUK 4.

April 9: Defra confirms that B2B2B packaging will remain in scope of the Extended Producer Responsibility (pEPR) regulations despite extensive engagement by us and other trade bodies.

April 29: The Association writes to Defra officials to request a meeting and seek guidance and support regarding implementing the pEPR scheme and its effects on shower enclosure manufacturers.

April 30: The Association is cited in a WTO paper on environmental goods and services on climate adaptation in the water sector.

May 15: The Association meets with Pack UK, the government agency tasked with implementing pEPR, highlighting the impact on shower enclosure manufacturers. Pack UK will discuss our points with the regulator.

May 20: Tom Reynolds chairs a panel discussion at the CEIR-Taps & Valves Europe Congress on water resilience, with Fiona Félix, John Watson, Lee Cartwright and Sébastien Mouret.

May 22: The Association requests a meeting with Kevin Hollinrake, Shadow SoS for Levelling Up, Housing and Communities, to discuss water efficiency solutions to support the MP's campaign for sustainable, community-focused housebuilding in North Yorkshire.

THE INDEPENDENT REVIEW OF DEFRA'S REGULATORY LANDSCAPE: BALANCING GROWTH AND ENVIRONMENTAL PROTECTION

Context

Since taking office, the UK Labour Government has attempted to prioritise economic growth at the centre of its policy agenda, framing it as a key goal and guiding principle across the government. This growth mission underpins its ambitious (some would say unrealistic) housebuilding targets and infrastructure developments. However, with the easing of planning rules to meet targets, could nature and the environment suffer as a result of our need to build?

Finding a path that balances the need to conserve and restore nature through environmental regulations while still meeting a growth agenda may result in some unpalatable trade-offs.

Environmental regulation influences every aspect of the built environment, so in this briefing, we'll examine a report titled 'An independent review of Defra's regulatory landscape' that calls on the

UK Government to implement a host of solutions for a system that currently "lets down both nature and growth."

Overview of the Corry Review

Dan Corry's review of Defra's regulatory landscape, commissioned by Steve Reed, the Secretary of State, sets out an ambitious reform agenda. Its central thesis is clear: the current regulatory system is neither delivering effective nature recovery nor enabling sustainable economic growth. Instead, it is hampered by complexity, inconsistency, and a lack of strategic direction. Corry proposes a framework centred around five key themes, accompanied by 29 actionable recommendations. These aim to simplify regulation, improve delivery, increase trust, and ensure that both environmental and development goals are advanced, not obstructed.



Corry's analysis suggests that environmental regulations are burdensome and ineffective, particularly for businesses, hampering the government's growth mission. Corry himself recognises that "environmental groups may be nervous about whether some of the recommendations – giving regulators more discretion, focusing more on value for money and growth, and considering changes to important regulations – could, if badly used, cause the environment and nature to suffer." However, he believes we can do better for economic growth and nature by reforming the system.





PACKAGING EXTENDED PRODUCER RESPONSIBILITY: WHERE ARE WE NOW?

What does this mean for the bathroom sector?

This review signals a potential shift in how environmental regulation is designed and enforced. For Bathroom Association members, the implications are considerable if implemented. However, with each potential positive, there is a negative, reflecting the fine balancing act required between economic growth and environmental protection.

By reducing regulatory red tape, the proposals could accelerate housebuilding and infrastructure development, major markets for bathroom products. However, fast approvals should not mean build at any cost; a sustainable water supply must be a priority.

Additionally, a simpler, more consistent regulatory framework could encourage manufacturers to innovate responsibly. However, regulatory uncertainty may arise if enforcement is not prioritised or laws are informally circumvented. Additionally, when regulators have consistently failed to enforce environmental laws – our sewage-laden waterways being a prime example – how can further deregulation be beneficial?

Furthermore, the concept of regulatory “sandboxes”, where rules are temporarily waived to test new ideas, could allow pioneering bathroom technologies to be trialled in real-world settings. The obstacles of recirculating showers could finally be overcome, for instance. However, a concern is that this relaxation could lead to further erosion of environmental protections, and again, if a sustainable water supply cannot be guaranteed, water scarcity will worsen.

As the UK water sector grapples with climate stressors, population growth, and public concerns over pollution, reform efforts must strike a balance between economic efficiency and robust, enforceable environmental protections. Continued engagement from water professionals, regulators, and stakeholders is needed to ensure that any regulatory reform upholds sustainability and public trust.

We will continue to monitor developments closely and represent your interests in conversations with Defra and other stakeholders.

Further reading:

[An independent review of Defra's regulatory landscape](#)
[Environmental Improvement Plan](#)

Introduction

The packaging Extended Producer Responsibility (pEPR) scheme is the UK Government's ambitious waste management reform, aiming to shift the costs of dealing with household packaging waste from the public sector to packaging producers. It follows the ‘polluter pays’ principle, seeking to incentivise more sustainable packaging design by making producers bear the full net cost of collecting, recycling, and disposing of packaging that ends up in household bins.

In [Issue 11](#) of Insights magazine, we provided an overview of the scheme and the ongoing efforts by our Association, the Construction Products Association (CPA), and other trade bodies to address a flaw in the definition of household waste, which brings many bathroom products within scope for fees.

This briefing recaps the key principles of the scheme and efforts to reach a sensible and pragmatic solution to mitigate the significant costs affecting our members due to the unintended consequences of the regulations.

But first, a plea: if you haven't yet engaged on this issue, we urge you to do so. The pEPR regime is here in all four nations of the UK, the costs are real, and failure to comply may result in significant financial penalties.

Key principles of the scheme

Producers are responsible for reporting and financing the collection and treatment of packaging waste. The regulations categorise producers into two main groups: large and small producers, and they have distinct reporting requirements. Large producers must collect and submit packaging data every six months, and small producers submit data annually, both through the [report packaging data service](#).

A small producer is defined as having a turnover between £1m–£2m, >25 tonnes of packaging/year. They must report data but are not yet subject to fees, and the 2024 data should have been submitted by April 1, 2025.



A large producer has a turnover of >£2m, >50 tonnes packaging/year and is subject to reporting and fee obligations. They must report data for July–December 2024 by April 1, 2025, and data for January–June 2025 by October 1, 2025.

Additionally, they must conduct a recyclability assessment of their household packaging using the Recyclability Assessment Methodology (RAM), assigning ratings of red, amber or green to different packaging types.

The latest base fees were published in June by PackUK, which is the scheme administrator for pEPR. These fees relate to year 1 (2025–2026), and the first invoices will be issued in October 2025.

From year 2 (2026–2027), fees will be modulated to drive a shift toward more environmentally sustainable packaging design, using recyclability as the indicator.

The conundrum

Business and commercial waste is explicitly stated to be out of scope of the new regulation; yet, the construction sector has found itself unexpectedly within scope.

The issue has arisen due to the inclusion in the definition of household waste that if a product is not sold directly to the end user, i.e. it passes through an intermediary, then the packaging waste associated with that product must be reported as household waste. And yes, that would include all packaging from bulky bathroom items, even if an installer or tradesperson disposes of it.

In the construction industry, products and materials are primarily sold through builders' merchants and distributors. The majority of our sector's products are sold through these channels, which involve

business-to-business (B2B) transactions or business-to-business-to-business (B2B2B) transactions, for example, to installers. Only products targeting the DIY market should, in our opinion, be in scope of pEPR fees, as packaging from these items would typically end up in household bins.

A point to remember is that 'household waste' also means waste collected from Household Waste and Recycling Centres.

How are we fighting against the crucial wording?

Since we last covered this thorny topic earlier in the year, we have seen peaks and troughs of activity by Defra, while behind-the-scenes work conducted by our Association and the CPA continued at pace.

In January, Defra released a paper based on a sprint exercise in which they examined how other countries are addressing the challenge; however, they remained concerned that many of the options would result in under-reporting, with challenges also arising from compliance monitoring. These findings prompted a 'back-to-basics' approach, with the hope of finding a simple solution that could be applied in Year 2 of the scheme.

We have also spoken with a PackUK official to understand how shower enclosure packaging, which typically involves large, heavy glass units, for their safe transport, could be excluded from pEPR, as it never enters the household waste stream. We are continuing to pursue and identify the evidence needed to secure a practical outcome for this product category.

"The pEPR regime is here in all four nations of the UK, the costs are real, and failure to comply may result in significant financial penalties."

On 1 July, Defra and the Department for Business and Trade (DBT) jointly hosted a roundtable on packaging reform, attended by the CPA, which identified 'dual-use packaging' (a term used by Defra to describe products that can be used commercially and domestically) as requiring urgent attention. This includes bathroom products. The government committed to working with industry to develop sector-specific solutions.

Overall, the work with Defra, the CPA, BMF and other trade associations and organisations continues as we collaborate to design a solution that is pragmatic, cost-effective and realistic.

"Only products targeting the DIY market should, in our opinion, be in scope of pEPR fees, as packaging from these items would typically end up in household bins."

What you need to do

Engage on this topic if you haven't already done so. Your business will likely be affected, and you must report your data accordingly. The first invoices will be landing in October this year, so don't be caught off guard.

Unfortunately, the hope that a solution will be found for Year 1 of the scheme is unrealistic. However, we, the CPA, the BMF, and other associations are working to provide Defra and PackUK with a simple solution that ensures a more level playing field for Year 2, illustrating sector-specific realities. However, as momentum from Defra on this appears to be stalling once again, it could take until Year 3 of the scheme for a satisfying outcome.

Our ideal ask is for an amendment to the current regulation, which we will continue to argue for. As a collective, we must demonstrate the obvious: that most products sold through the likes of merchants do not result in household waste. Only those products targeted toward the DIY market should be subject to pEPR fees.

Manufacturers now face greater financial exposure tied to material choices. The modulation policy provides predictability but also raises operational questions about how recyclability will be assessed and how quickly industry can adapt, especially where complex or composite packaging is used. This is a critical moment for product teams to evaluate packaging strategy with cost, compliance and recyclability in mind, not just for 2026, but for the decade ahead.

Further reading:

[The Producer Responsibility Obligations \(Packaging and Packaging Waste\) Regulations 2024](#)

[Extended producer responsibility for packaging: who is affected and what to do](#)
[EPR: How to assess household and non-household packaging](#)

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RAISING

STANDARDS



April 1: The Bathroom Association met with Defra officials requesting that AUK 4 be prioritised. They agreed to seek clarification from the Drinking Water team and provide an official update on its progress.

April 3: The Association hosts an online technical meeting to discuss the NHS New Hospital Programme and provide comments on the ongoing briefs for hand wash station fittings, fixtures and equipment for ensuite bathroom toilets and showers.

April 10: The Association circulates its response to the Construction Products Reform Green Paper to members and the CPA for feedback.

April 16: The Association writes to the water minister, Emma Hardy, expressing strong concerns over the government's intention to develop a standalone UK water efficiency label under the proposed Mandatory Water Efficiency Labelling (MWEL) scheme.

May 7: Andy McLean, Bathroom Association Technical Director, responds to a PFAS Enquiry, supporting a proportionate, risk-based approach to PFAS regulation.

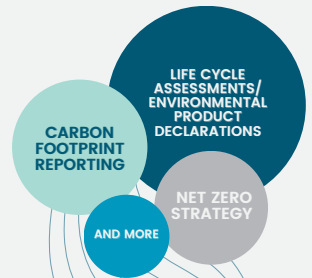
May 16: The Association writes to government, raising the issue of relying on the Interim Voluntary Agreement for backflow protection for WCs while awaiting the sign-off of AUK4.

May 19: The Association submits a response to the government's Green Paper on Construction Products Reform, and Andy McLean contributes to the CPA response as a BSI/CEN standards specialist.

June 24: At the Future of Water Theatre at InstallerSHOW, Andy McLean, Bathroom Association Technical Director, chairs a discussion on changes in regulations and why certification matters.

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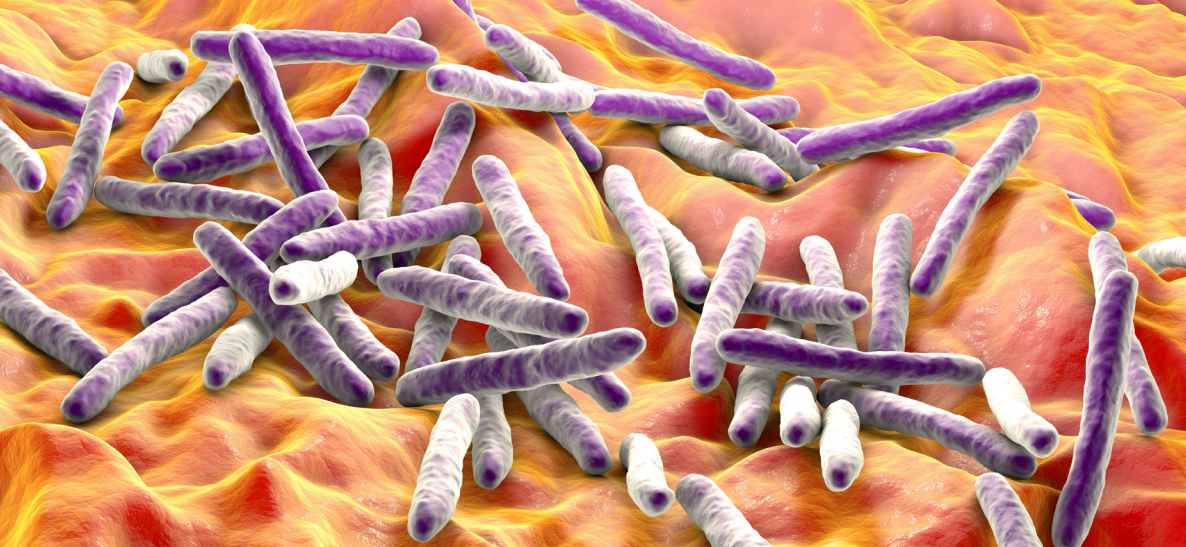
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(Bacteria Mycobacterium tuberculosis, the causative agent of tuberculosis)

UNDERSTANDING THE NEW HOSPITAL PROGRAMME AND ITS RELEVANCE TO WATER FITTINGS

Background

The New Hospital Programme (NHP) is a UK Government initiative aimed at transforming the country's healthcare infrastructure while also addressing systemic risks related to hygiene, infection control, and clinical safety within built environments. In this context, bathroom products and water fittings have become central to hospital design, particularly because of their direct connection to hygiene, cross-contamination, and patient safety.

In August 2024, an NHS Estates Technical Bulletin (NETB) No. 2024/3 introduced revised guidance on water fittings used in healthcare settings, developed in response to a coroner's report aimed at preventing further deaths from M. abscessus colonisation in healthcare water systems.

The Bulletin highlighted the heightened vulnerability of high-risk patients to bacterial infections caused by pathogens such as Legionella, Pseudomonas, and nontuberculous mycobacteria (NTM). One key focus is the "wet testing" of Thermostatic Mixing Valves (TMVs), taps, and fittings during manufacturing—a standard industry practice now under scrutiny for potentially contributing to pathogen risk if residual moisture remains post-testing.

Wet Testing Concerns and Safer Alternatives: Mitigating Bacterial Risk

The project-specific Water Safety Group (PWSG) has the responsibility to minimise the effect of contamination throughout the supply chain, and NHS Estates has been collaborating with the Bathroom Association and members to develop a level playing field for manufacturers whereby suitable guidance and standardisation can satisfy infection control requirements.

NHS Estates has identified traditional wet testing as a significant concern due to the introduction of water into products that are subsequently stored and shipped. Even after disinfection, residual moisture creates ideal conditions for bacterial growth. This concern is particularly urgent in hospital environments, where even trace amounts of pathogens can lead to severe infections.

Key concerns with wet testing include:

- Water introduces potential for pathogen growth during storage.
- Disinfection after wet-testing does not eradicate all bacteria (e.g., Mycobacterium tuberculosis).
- Pathogens can survive and multiply in moist environments, even after sterilisation.
- Products may become re-contaminated before installation.

Preferred Alternatives and Their Risks

At a meeting in July 2025 with NHS Estates and many Association members, several alternative testing strategies were discussed. A total of 12 solutions were identified (with varying associated risks) from wet testing, then disinfecting (high potential for contamination), to steam decontamination (kills most pathogens but contains residual moisture), to using Ultraviolet Sterilisation and more.

Figure 1 highlights the top four options with the least chance of contamination based purely on the discussions held. While these seem the most favourable, no final solution has yet been decided, highlighting the challenge ahead.

TOP 4 SOLUTIONS RECOMMENDED TO CONTROL CONTAMINATION

Solution to Control Contamination	Associated Pros	Associated Cons
Dry Testing (air can be used as an alternative test)	<ul style="list-style-type: none"> No water = pathogens not introduced to product. -air should be highly filtered or medical grade. 	<ul style="list-style-type: none"> Air pressure highlights faults that water may not have. Appropriate quality of air can be expensive. Doesn't test TMV warranty concerns. Does not detect or measure contamination level already in product.
Treat products for hospitals separately from volume production without testing.	No contaminants introduced.	Does not detect or measure contamination level already in product? Some products would be very difficult due to volume automated production.
Testing TMVs at commissioning stage, rather than factory test.	Elements would be factory tested. No contaminants introduced.	Can not guarantee no failure at the site. The hospital commissioning team carries risk of failure (never events). Testing is about the whole fitting interaction, not as elements.
Thermal Decontamination	Removes contaminants to provide clean fittings. Kills pathogens.	Conditions promoting growth after disinfection. Expensive. Requires evidence of total decontamination. Control of fitting parts required to understand the effect of heat on components/seals etc.



Where GS1 Standards Fit: Enabling Traceability and Interoperability in Healthcare Fittings

Another critical component of the NHP's push for infection prevention and lifecycle management is the integration of GS1 standards across all fixtures and fittings, including water-related bathroom products.

GS1 standards are a globally recognised system for the unique identification of every product, person, and place in a supply chain. In healthcare, these standards enable end-to-end traceability from manufacturer to patient, supporting both clinical safety and asset lifecycle management.

Mandated by the Department of Health and Social Care as part of the NHS eProcurement Strategy, GS1 standards ensure that data can be seamlessly shared between hospital systems, procurement platforms, and manufacturer databases.

By tagging products with GS1 identifiers and sharing this data at the point of delivery and installation, manufacturers help establish a "golden thread" of information across the product's lifecycle—from production to hospital use to decommissioning.

Inevitably, as the NHS's mandated system, adopting GS1 standards for NHP is necessary for manufacturers supplying into the healthcare space in the UK. Additionally, using this standard is beneficial for other markets, as companies can also create EU-compliant digital product passports using GS1 standards.

How Bathroom Manufacturers Should Engage and Next Steps

The NHS Estates team is keen to collaborate with bathroom manufacturers to co-develop safer testing procedures that meet both hygiene standards and functional requirements. A key area of focus is co-designing dry test protocols that can serve as safe, reliable alternatives to wet testing, particularly for products intended for sensitive areas of hospitals. Along with the adoption of GS1 standards, new hospitals intend to become 'smart hospitals', adopting many of the digital practices seen through the BIM (building information modelling) programme.

Technical roundtables with all stakeholders will be essential to finalise standard testing protocols. Further meetings, including one on 30 September 2025, will examine the process implementation of some of the more practical solutions while working towards establishing a level playing field. The goal is to provide clear guidance and greater standardisation to the process, thereby meeting both infection control requirements and manufacturing process standards.

While this presents challenges for bathroom manufacturers, it also offers opportunities for business growth, leadership in innovation, product safety, and a positive impact on public health.

Further reading:

[NHS Estates Technical Bulletin \(NETB\) No. 2024/3](#)
[Introduction to GS1 standards for the NHP \(webinar\)](#)



We're doing whatever it takes to help everyone with cancer get the best care the UK has to offer, whoever and wherever they are.

Macmillan Cancer Support has spent more than 100 years helping people living with cancer. We know that cancer can disrupt your whole life. And it can be made worse simply because of who you are and where you live.

But we're here to change that.

The number of people diagnosed with cancer is growing, and every one of them needs the best support to meet their unique needs.

That's why we'll do whatever it takes to help everyone living with cancer across the UK get the support they need right now and transform cancer care for everyone who will be diagnosed in the future.

The Bathroom Association is proud to support Macmillan in 2025 through our fundraising efforts.

If you have any questions or just need to talk, call the Macmillan Support Line on 0808 808 00 00. We're open, 7 days a week, 8am to 8pm or visit macmillan.org.uk

Macmillan Cancer Support, registered charity in England and Wales (261017), Scotland (SC039907) and the Isle of Man (604). Also operating in Northern Ireland.



THE EU CPR AND NEW STANDARDS DEVELOPMENT

Introduction

Before we dive in, a brief plea for patience. We know this topic can be more complex than assembling flat-pack furniture without the instructions, and it comes with more acronyms than a teenager's text messages. While we've tried to make this as straightforward as possible, there's no way around some of the three-letter abbreviations (TLAs, ironically). For ease, we have an acronym-busting table to help.

In January 2025, the revised Construction Products Regulation (CPR) officially entered into force across the EU. This landmark update introduces sweeping changes to the way construction products such as sanitaryware, showers, and other bathroom appliances are placed on the EU market.

CPR not only impacts product conformity and CE marking but also introduces a new framework of performance and environmental obligations, requiring us to engage more proactively in shaping the technical standards.

The Bathroom Association is leading an initiative to accelerate standards for our sector, bypassing traditional delays in the European standardisation process.

This briefing examines how harmonised standards (hENs) are developed under the CPR, the complexities involved, and why we are proactively developing sector-specific documents.

What is the CPR and Why Does it Matter?

The CPR aims to ensure that construction products meet uniform performance and safety requirements when traded within the EU by harmonising technical performance characteristics, sustainability declarations, CE marking rules, and environmental performance through the Digital Product Passport (DPP) and Declaration of Performance and Conformity (DoPC).

Furthermore, manufacturers must deliver the DoPC electronically or embed it within a DPP that is both machine- and human-readable, which is essential for integration with BIM and regulatory access. Additionally, the DPP will become mandatory, encompassing more than just the DoPC, and will enable greater data transfer within the construction ecosystem.

Figure 1: Acronym Decoder: Making Sense of the Alphabet Soup

ACRONYM	FULL TERM	WHAT IT MEANS (IN PLAIN ENGLISH)
CPR	Construction Products Regulation	EU rules that make sure construction products (like bathroom fixtures) are safe, green, and standardised.
DoP	Declaration of Performance	A document that says how a product performs (being replaced by DoPC under the new rules).
DoPC	Declaration of Performance and Conformity	A new version of the DoP that also proves the product meets EU laws and includes environmental info.
DPP	Digital Product Passport	A digital file that carries all the product's facts – from safety to sustainability – in one place.
CE Mark	Conformité Européenne Marking	A symbol showing your product meets EU standards and can be legally sold there (and in the UK, for now).
hEN	Harmonised European Standard	The official recipe book for how products are tested and checked across the EU. .
SReq	Standardisation Request	A formal ask from the European Commission to start or update a standard.
ESO	European Standardisation Organisation	Groups like CEN that write the rules (standards) for products.
CEN	European Committee for Standardization	The main group in charge of writing harmonised standards in construction (and lots of other sectors).
EAD	European Assessment Document	A set of rules for testing products that aren't covered by existing standards.
EN 15804	Environmental Product Declaration Standard	Sets the rules for telling people how environmentally friendly a product is.
NSB	National Standardisation Body	Your country's standards team – they copy EU standards into national law.
OJEU	Official Journal of the European Union	Where the EU officially publishes standards and laws (the final stamp of approval).

What is the CPR acquis?

In the context of the CPR, the acquis refers specifically to the body of rules and technical specifications governing construction products within the EU. The acquis process is crucial for adapting existing standards and technical specifications to align with the revised CPR.

It includes hENs, EADs, and other relevant documents that define the requirements for construction products. This acquis review ensures that standards remain current and reflect the CPR's updated sustainability focus (e.g. EN 15804 for Environmental Product Declarations). However, this complexity significantly slows progress.

How Standards Are Normally Developed: The SReq Route

To place a CE-marked construction product on the market, it must comply with a hEN aligned with the CPR's objectives. These hENs are created through a process initiated by a Standardisation Request (SReq) from the European Commission to a European Standardisation Organisation (ESO) such as CEN.

Figure 2: New CPR harmonised standard workflow



Figure 2 illustrates a simplified version of the standard flow, but although the entire process is thorough, it is also painfully slow. Only 1 in 5 EU standards are commissioned this way, and the entire cycle can take 8 to 12 years. For bathroom products, ranked 30th out of 34 product families (CPR acquis decides on product prioritisation), hENs are not expected until 2035 if we rely solely on the SReq route.

While the CPR acquis review ensures that standards remain current and reflect the CPR's updated sustainability focus, the complexity significantly slows progress.

Sustainability & Digitalisation: EN 15804 and the DoPC

One key requirement under the CPR is alignment with EN 15804, which standardises how EPDs are produced. The data in EPDs will gradually be absorbed into the DoPC, which will cover basic performance characteristics, life-cycle environmental data and language requirements across all relevant EU markets.

The complimentary product category rules (c-PCR) are used to develop more detailed and specific rules for creating EPDs for particular product types within a broader product category, enabling a more functional and nuanced assessment of environmental impacts. c-PCRs are essential for ensuring comparability and consistency in EPDs, facilitating meaningful comparisons between products.

The DPP will serve as the primary platform for CPR compliance, connecting product data for stakeholders such as architects, specifiers, and regulators. Although it is expected to be operational by 2026, manufacturers should start standardising product data now.

Why the Bathroom Association Is Taking an Alternative Path

Waiting until 2035 for a hEN is not viable for bathroom manufacturers. That's why the Association is proactively developing standards for sanitary appliances without waiting for a formal SReq or CPR acquis update.

This approach involves:

- Compiling all relevant technical and environmental data usually requested via an SReq
- Working directly with CEN committees
- Presenting complete, CPR-aligned draft standards to the European Commission

By doing this, we bypass the procedural delays of SReqs while still aligning with CPR principles. This provides our sector with faster access to up-to-date, accurate, and relevant product standards. Although this process is quicker than the standard procedure, it remains time-consuming and complex. For instance, our work must follow CEN-CENELEC Guide 36, which details the rules for the drafting and presentation of candidate hENs in support of the CPR.

By collecting the required performance, environmental, and usage data in advance, the fast-track initiative aims to ensure bathroom product standards are aligned with CPR well before 2035, supporting compliance, innovation, and market access.

What this means for bathroom manufacturers

To ensure continued market access and legal compliance, it is essential

to stay informed. First and foremost, manufacturers must begin aligning product data with the requirements of the revised CPR, particularly by integrating environmental performance indicators into their documentation. Preparing for digitisation, including adoption of the DPP and readiness to issue a DoPC, is critical. These digital tools will become mandatory and serve as the backbone for regulatory and market communication in the coming years.

A key priority must be to ensure that your products can be legitimately CE-marked. For products not yet covered by hEN, such as taps, which fall under the Drinking Water Directive (subject to third-party performance testing), manufacturers must take alternative routes. In these cases, or for innovative products not included in a hEN, a European Assessment Document (EAD) must be developed and approved through the European Organisation for Technical Assessment (EOTA). When the EAD is in place and the product meets the associated criteria, CE marking is still permissible and valid.

This highlights the importance of collaborating with the right technical partners and trade associations to ensure that the correct conformity routes are followed. Having confidence that your products meet all CPR-aligned performance and environmental requirements is crucial, not only for compliance but also for maintaining a strong market reputation, fostering customer trust, and future-proofing against the demands of digital transparency.

Further Reading:

[CPR overview](#)
[CEN-CENELEC Guide 36](#)

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Image from the BMBI Round Table Debate at the BMF in October 2024.

UNDERSTANDING

& GROWING THE

MARKET

April 9: The Bathroom Association requests member input into the government's response concerning President Trump's universal 10% tariffs.

April 10: Amy Kirk, the Association's Engagement Director, attends a Chamber of Commerce session examining how businesses can enter new USA markets successfully.

May 8: The Association requests members participate in its data pooling initiative, which collates monthly sales data to produce detailed market performance reports by category value and volume.

May 21: The Bathroom Association's Jane Blakeborough presents a webinar detailing the association's latest research regarding 'Understanding the Merchant'.

May 22: The Association presents its Bathroom Design and Innovation Report 24/25 via a webinar, where the latest trends are highlighted.

June 16: Ofwat appoints a representative from the Association to its strategic advisory board for the Water Efficiency Fund. The regulator agrees that input on product development and commercialisation is critical to the fund's success.

June 24: Marking the opening of the Future of Water Theatre at InstallerSHOW, Tom Reynolds and Craig Baker detail the evolution of the Bathroom Manufacturers Association to the Bathroom Association, setting out the direction and ambitions to unite the whole bathroom industry.

June 25: During a discussion at InstallerSHOW, Jane Blakeborough, Research Manager, hosts a panel discussion on bathroom trends and how to elevate bathrooms in 2025 and beyond.

LEGALISING LOOS: A GROWING CAMPAIGN FOR INVESTMENT

There are few more basic human needs than access to a clean, safe toilet. Yet across the UK, in the public realm, this fundamental amenity has been systematically neglected for years. With almost 40% of public toilets closed since the turn of the millennium, communities are feeling the strain, both economically and socially, as well as physically.

At the Bathroom Association, we have been campaigning to turn the tide. Alongside the British Toilet Association (BTA) and an expanding coalition of civic groups and parliamentarians, we are calling for a transformation in how the UK values and funds public toilet provision. It is a matter of public health, social justice, and economic regeneration. Our joint campaign, "Legalise Loos", is gaining traction and could unlock benefits for society and our sector as key suppliers.

Background: The state we're in

The data paints a grim picture. The Association's 'Nowhere to Go' report, based on a national Opinion survey, revealed that public satisfaction with toilet provision is abysmally low, with an average score of 4.2 out of 10. Only 24% of people believe there are enough toilets in their area, and 43% think there are insufficient facilities for people with disabilities. Cleanliness, safety, and accessibility are consistently flagged as major concerns.



Minister Alex Norris has expressed an interest in the public loos agenda

Nearly a third of people rarely or never use public loos, often due to poor conditions or an absence altogether.

This lack of provision disproportionately affects vulnerable groups. According to the BTA, 14 million people experience incontinence, and 1 in 5 Britons restrict their travel due to anxiety over toilet access. A staggering 81% of older adults say they would be more likely to visit shops and cafés if they could rely on good toilet facilities. Beyond personal discomfort and social exclusion, the consequences extend to economic underperformance and public hygiene issues. In Westminster alone, cleaning costs associated with public fouling top £1 million annually.

"1 in 5 Britons restrict their travel due to anxiety over toilet access."



A collaborative campaign

Recognising the urgency, the Bathroom Association has joined forces with the BTA to launch a coordinated campaign for investment in public toilets. The effort builds on past successes, including the removal of business rates for standalone public loos. Since 2022, our “Nowhere to Go” report has been widely shared with policymakers and has informed a suite of proposals, first advanced during the passage of the 2024 Levelling Up Bill. These included a national independent review of toilet provision, public convenience plans mandated for Tier 2 authorities, and a rates relief scheme for businesses opening their loos to non-customers.

Although these amendments didn't survive the legislative process at the time, they laid vital groundwork. Following the 2025 general election, our coalition secured a meeting with the newly appointed Minister for Local Government, Alex Norris MP, who instructed officials to begin investigating the proposals in earnest. This was swiftly followed by a parliamentary briefing hosted by the Bathroom Association, BTA, and allies like Crohn's & Colitis UK and the London Loo Alliance, attended by MPs and peers across the political spectrum. Their commitment to raising the issue in Parliament is helping to maintain the pressure.

Why this is important to bathroom manufacturers

This campaign is about pursuing a policy that benefits society and also benefits our sector as a group of suppliers. It shows we're an industry with purpose, and if we succeed, there are clear opportunities for the bathroom manufacturing sector. Public toilet provision has a direct bearing

on our industry's visibility, credibility, and commercial success. Our members' products—sanitaryware, taps, hand dryers, and accessibility solutions—are the hardware of human dignity in public spaces. When well-designed and maintained toilets are installed in retail centres, transport hubs, and community venues, they not only improve lives, they create business.

Investment in public washrooms also aligns with our sector's expertise in hygiene, water efficiency, and innovation. In our white paper, *Creating the Optimum Public Bathroom*, we detailed how cutting-edge design and fixtures can reduce maintenance costs, improve sustainability, and extend the lifecycle of facilities. From sensor-activated taps to waterless urinals, manufacturers are well-placed to deliver future-proof infrastructure.

Moreover, this campaign strengthens our role as advocates of inclusive, dignified public spaces. By championing this cause, we elevate the industry beyond its supply chain roots and into the realm of civic leadership. Our members can take pride in supporting an agenda that unites economic pragmatism with social value.

Summary

The campaign to improve public toilet provision is moving beyond a fringe issue. The coalition, led by the Bathroom Association and BTA, has been pleasantly surprised by the obvious cross-party political interest in the issue, and the initial Ministerial support is encouraging. The case is unarguable. Toilets are not just a convenience; they are economic enablers, public health assets, and social equalisers. With the level of political salience, an increasingly compelling economic rationale, and broad-based public support, real change now seems achievable. Given the wider economic framework and standard civil service inertia, the pressure needs to be maintained.

“Public toilet provision has a direct bearing on our industry's visibility, credibility, and commercial success.”

WHAT THE 2025 COMPREHENSIVE SPENDING REVIEW MEANS FOR THE BATHROOM INDUSTRY

Introduction and background

The June 2025 Comprehensive Spending Review (CSR) marks a pivotal moment in the current government's first year. Against a backdrop of subdued economic growth, tight fiscal rules, and trailing in the polls behind a surging Reform, the Labour Chancellor has chosen what she herself calls “a bold strategy”—prioritising capital investment in public infrastructure, housing, and net-zero projects, and holding back on day-to-day departmental spending.

“For the bathroom sector, the Comprehensive Spending Review presents a mix of opportunities and uncertainties.”

The core message the Chancellor wished to convey was one of “renewal”: a commitment to ensuring the public feels the benefits of growth in their daily lives, in their homes, communities and workplaces. But delivering on this message is no easy task. It relies on rapid delivery, local-level cooperation, and resilience to global economic shocks. For the bathroom sector, the Comprehensive Spending Review presents a mix of opportunities and uncertainties. While demand-side signals are positive, the pace of regulatory development—especially in water efficiency and compliance—is likely to slow.

Overview of the CSR (and key measures for the construction industry)

The CSR sets departmental spending limits through to 2028/29 for day-to-day expenditure and through to 2029/30 for capital investment. The government has committed to a sharp increase in capital spending, projected to rise by 3.6% in real terms over the Parliament, while overall departmental budgets grow by 2.3% on average. However, this investment is funded by constraints elsewhere. Day-to-day departmental spending increases by only 1.7%, meaning many departments will see real-terms cuts to their core operating budgets.



For the construction and housing sectors, the capital programme is substantial. The government has confirmed £39 billion for a new 10-year Affordable Homes Programme, with a commitment to build and refurbish housing stock, particularly in deprived areas and regeneration zones. Alongside this, £4.8 billion will be used to underpin financial transactions and unlock private housebuilding, while a further £2.5 billion has been allocated to the East West Rail scheme to stimulate housing and economic growth across the Oxford–Cambridge corridor. Upgrades to military accommodation and refurbishments of schools, colleges and hospitals also feature prominently, creating broad-based demand for bathroom manufacturers.

“Defra, a department central to regulation affecting bathroom products, will see a 2.7% annual real-terms cut to its day-to-day budget over the Parliament.”

The government has also reaffirmed its commitment to investing in skills. A total of £625 million has been earmarked to train up to 60,000 skilled construction workers over the next four years, while an additional £1.2 billion per year will be spent by 2028–29 to improve training opportunities for 16- to 19-year-olds. This point puts some resources in the direction of a critical issue for the industry – the availability of tradespeople to install bathrooms.

Net-zero measures are prominent in the CSR. The £13.2 billion Warm Homes Plan will fund energy efficiency retrofits, including heat pumps, insulation, solar panels, and battery storage, with a clear focus on upgrading the existing housing stock. The plan will be delivered in partnership with public finance institutions and the National Wealth Fund. While much of this is energy-focused, there are also knock-on implications for water efficiency.



Perhaps the most notable policy trade-off lies in departmental budgets. While energy and infrastructure departments receive uplifts, others face cuts. Defra, a department central to regulation affecting bathroom products, will see a 2.7% annual real-terms cut to its day-to-day budget over the Parliament. This is one of the steepest reductions across government. Despite this, Defra remains the department with the most live regulatory activity relevant to our industry, including the development of Mandatory Water Efficiency Labelling (MWEL), interventions to address leaky toilets, the revision of Building Regulations Part G, and the UK's response to implementing the Drinking Water Directive. Likely, these pressures will now lead to slower progress on these fronts.

Why this matters to the bathroom industry

For bathroom manufacturers, distributors, and retailers, the CSR provides a mixed outlook. On the one hand, increased investment in housing and refurbishment—particularly within the affordable and social housing sectors—will drive demand for bathroom products in volume markets. As local authorities, housing associations and private developers respond to these funding streams, procurement opportunities will expand.

On the retrofit front, the Warm Homes Plan is highly relevant. While the focus is energy, it creates a gateway for integrated household upgrades, including more water-efficient fittings. Association research and advocacy will be essential in making the case that water efficiency is a core element of Net Zero-ready homes. The potential to integrate compliant and efficient bathroom products into retrofit pathways should not be overlooked.

At the same time, Defra's funding constraints are likely to delay regulatory clarity and policy implementation. The anticipated rollout of MWEL may slip, and timelines for updating Part G or aligning with the Drinking Water Directive could stretch further into the Parliament or even the next. This delay will frustrate efforts by responsible manufacturers who have already invested in sustainability and compliance, and could prolong a lack of consistency in enforcement and labelling.

The skills agenda is also worth noting. The CSR promises significant new funding for vocational and technical training, particularly in the construction sector. This could support workforce development across installation, plumbing, and retrofitting—key pressure points for the bathroom industry. There may be opportunities for businesses to engage with further education providers, develop training partnerships, or even access public funds to support internal training initiatives.

“For bathroom manufacturers, distributors, and retailers, the CSR provides a mixed outlook. As local authorities, housing associations and private developers respond to these funding streams, procurement opportunities will expand.”

Actions for bathroom manufacturers, distributors and retailers

The bathroom sector should plan for more frustration with water efficiency regulations. Rather than expecting imminent policy rollouts and clarity, we should expect bursts of regulatory activity. Ongoing engagement with Defra will remain important, especially to ensure that when regulatory momentum resumes, industry perspectives are well-represented.

At the same time, businesses should actively monitor and position themselves for opportunities linked to housing regeneration and retrofits. This involves engaging with local authorities, housing associations, and procurement frameworks to ensure product portfolios meet efficiency and accessibility standards, as well as preparing for increased demand in entry- and mid-range products. Manufacturers should also consider how their products align with broader objectives around accessibility, decarbonisation, and digital innovation—areas that are receiving cross-cutting policy attention.

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