

INSIGHTS ISSUE 14





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FOREWORD



It's a pleasure and a privilege to welcome you to this latest edition of Insights, and my

first as Chief Executive of the Bathroom Association.

I recognise the strong foundation laid by my predecessor. Now is a critical and highly visible time for our industry, and I believe the best way to honour our past progress is to actively drive us into the future. I'm excited to join this valuesdriven team and focus on translating our potential into tangible next steps.

What unites the briefings in this edition of Insights is a shared recognition that water is both an economic and environmental priority, and the bathroom sector sits right at the intersection of that challenge.

We begin with an analysis of the Independent Water Commission's Final Report. examining its implications for manufacturers and our sector's role in delivering resilient water infrastructure. Continuing this theme, the Good Homes Alliance quide on Water-smart Housing for a Changing Climate offers timely insights into how planning, building design, and product innovation must evolve to meet climate imperatives.

But transformation also depends on people. Our skills briefing examines how the UK can build the technical capacity needed to support circular water systems and water reuse-both areas where demand is growing, but skills remain in short supply. The government's ongoing consultation on water efficiency standards presents a pivotal opportunity to align regulatory frameworks with innovation, and we encourage all members to participate in this process.

We also explore the broader business landscape in our feature on Government Support for SMEs, identifying areas where the bathroom industry can better leverage policy tools to grow and adapt, particularly during times of economic transition.

In my years at CIPD, I've seen the power of member-led communities to shape national conversations and influence change. At the Bathroom Association, I intend to champion that same spirit—deepening our strategic partnerships, expanding our influence across the supply chain, and ensuring your voice is heard where it matters most.

Thank you for reading and for the warm welcome. I look forward to working with and for you as we embark on the Association's next chapter.

Daphne Doody-Green, Chief Executive Officer

ALMANAC

This quarter's news in brief

AUGUST

2025

August 1: According to the

economy among business

leaders has hit its lowest ebb

August 6: Analysis by the

National Institute of

Rachel Reeves, the

chancellor, is facing a

government finances,

tax hikes or spending

August 7: Building in the UK

falls at the fastest pace since

Covid-19 pandemic, dealing

a blow to the government's

housebuilding ambitions.

the early days of the

cuts in the budget.

raising the prospect of

£50bn black hole in the

Economic and Social

Institute of Directors,

confidence in the UK

since the Brexit vote.

August 8: The Bank of England cuts interest rates to 4%, the lowest

level in two years.

August 12: Ministers are

Water into temporary

public ownership in a

preparing to take Thames

rescue that could pave the

way for it to be sold off to

a Chinese infrastructure

August 14: ONS

figures show UK

slowed to 0.3%

June this year.

August 18: The number

year-on-year, according

August 20: The

headline rate of

3.8%. ONS data

shows.

of house sales agreed

last month rose 8%

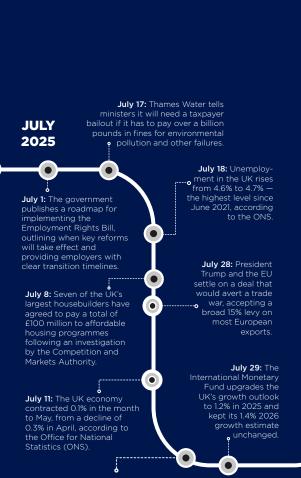
to property website

Rightmove.

economic growth

between April and

company.



July 16: Inflation jumped to 3.6 % on an annual basis in June, up from 3.4% in the previous month, according to the ONS.

SEPTEMBER 2025

September 1: Daphne Doody-Green officially joins •• the Bathroom Association as the new Chief Executive. September 3: Lenders to the troubled water company Thames Water have set out plans to deliver £20.5 billion of September 5: The headline S&P Global UK Construction Purchasing Managers' Index registered 45.5 in August, up from 44.3 in July (which is the lowest reading for just over five years). September 8: The Home Builders Federation's latest Housing Pipeline report shows that planning permission was granted for just 44.520 new homes in England during the second drop on the same quarter last September 9: Ofwat confirms an £86m penalty against Anglian Water and South

West Water over the

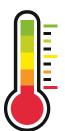
networks

companies' failure to maintain their sewage works and

September 12: ONS data reveals the UK economy ...o stagnated in July, with zero month-on-month growth in gross domestic product (GDP).

September 23: Defra announces a 12-week consultation regarding amendments to the current Building Regulations 2010 Part G2 to tighten water efficiency standards in new homes.

September 24: Britain will suffer the highest level of inflation of any major economy this year, analysis from the OECD warns.



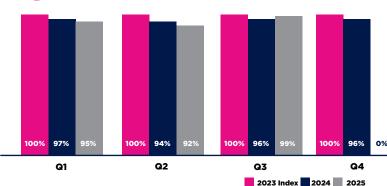
ECONOMIC BAROMETER

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.



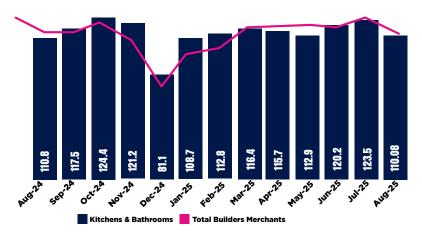
Q3 of 2025 has been a strong quarter for

Bathroom Association members, showing positive results not only in overall turnover but also in likefor-like performance.





The Kitchens and Bathrooms category continues to track slightly below the total builders' merchants index figures.









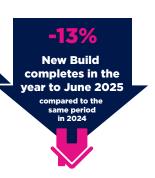
Total plumbing and heating value sales in August 2025 were down -2.6% compared with August 2024.

Total plumbing and heating merchants' volume sales dropped by -9.2%, while prices rose by +7.3% year-on-year.



The latest housebuilding data reveals a sharp increase in new-build starts in the year to June 2025. However, this increased activity is offset by a decline in completions over the same period.









Bank of England

The Bank of England has held the bank interest rate steady until the next announcement in November.



3.8%

Current inflation rate target:

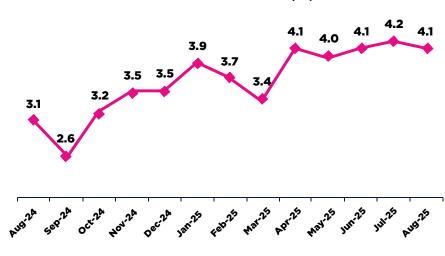
2%

The inflation rate is expected to remain over 3.5% for the rest of 2025, driven by rising food and fuel prices.



The Consumer Prices Index including owner occupiers' housing costs (CPIH) rose by 4.1% in the 12 months to August 2025, down from 4.2% in the 12 months to July.

CPIH 12-Month rate (%)



Annual growth in employees' average earnings when adjusted for inflation was 0.7% for regular earnings (excluding bonuses) and 0.5% for total earnings (including bonuses).



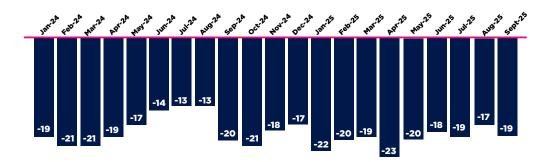
The UK employment rate has been flat over the past year.

75.1% UK Employment Rate aged 16-64yrs





All five measures of consumer confidence were down in September, causing the overall index score to slip by 2 points.



42%
Overall
Business
Confidence

The Lloyds Bank Business Barometer shows that overall business confidence fell by 12 points to its lowest since the initial US tariff announcements negatively impacted sentiment in April.



Despite the sharp decline, the largest since April 2020, confidence remains above the survey's long-term average of 29%.

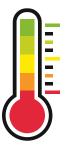


The IMF predicts that the UK will be the second-fastest-growing G7 economy in 2025 but warns that the UK will face the highest rate of inflation among G7 nations this year and next, driven by rising energy and utility bills.

3%

UK Economic Forecast Growth
1.3%

Global Economic



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.

GOVERNMENT'S FIRST RESHUFFLE

In September, Keir Starmer carried out the first wide-ranging reshuffle of his premiership to date - prompted by the forced resignation of Angela Rayner.

The reshuffle has seen the departure of Alex Norris from the Ministry of Housing, Communities and Local Government. Norris's departure raises concerns that issues such as public toilets could slip off the policy radar. However, it is encouraging to see a strong ally of the sector rising within government ranks.

The reshuffle also saw the appointment of a new progrowth team at Defra and the promotion of Emma Reynolds to Environment Secretary. Reynolds will now have oversight of the water sector, and has already announced that a new Water Reform Bill is on its way.

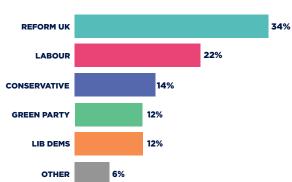


ALEX NORRIS MP



EMMA REYNOLDS MP

A look at the polls: Reform expand their lead, and the Green Party surges



Reform has kept up its impressive feat in the polls, maintaining 30% of the popular vote in polling.

Labour is still on a downward slope, falling to 20%. In addition to the threat of Reform, the government now faces a new threat on their left as the Green Party builds support and momentum with a new party leader, Zack Polanski.



WATER ON THE AGENDAWater Efficiency Consultation

The government has launched a 12-week consultation to update Building Regulations with new water efficiency rules aimed at tackling water shortages, cutting bills, and unblocking stalled housing developments. The proposed measures would require new homes to be fitted with simple water-saving features such as aerated taps, efficient showerheads, and dual-flush toilets. A call for evidence will explore further innovations, as ministers stress that smarter water use is essential both for growth and for environmental protection.

This comes following the continued effect of summer's dry weather. Drought permits have been applied to a number of regions, especially Yorkshire Water, to help conserve water and secure public drinking water supplies.

PARTY CONFERENCE SEASON

Labour's Party Conference was used to project resilience and delivery in the face of political and economic headwinds. The key takeaways for the industry were:

- Housing Secretary Steve Reed confirmed 12 New Town sites, with spades in the ground promised by the end of the parliament (2029).
- Environment Secretary Emma Reynolds announced a new Water Reform Bill that will abolish Ofwat and create a tougher regulator.
- Labour reinforced its commitment to skills and training with a new goal for twothirds of young people to achieve higher-level qualifications by 25, backed by a Youth Guarantee offering apprenticeships or training for all.

PRIDE IN PLACE PROGRAMME

The government has launched a landmark £5 billion Pride in Place programme to revitalise communities across the country. Under the plan, 169 areas will each receive £2 million annually for a decade, while a further 95 areas will share £150 million for immediate upgrades to parks, high streets, leisure centres, and public spaces.

Crucially, the programme also recognises that accessible facilities are key to inclusive town centres. The government has included public toilet provision as a pre-approved intervention for areas receiving Pride in Place funding.

Analysis provided by Jonathan Connolly, Account Manager, inflect



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July 7: Tom Reynolds, former Association CEO, attends the 'Innovation Festival' run by Northumbrian Water Group to map out actions and pledges to progress towards their vision of enabling recirculating showers in the UK.

July 8: Tom Reynolds appears in the first episode of the 'Believing in Better' podcast, exploring how the industry is tackling challenges on sustainability, water efficiency and hygiene.

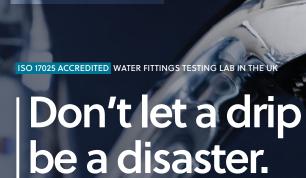
August 6: Tom Reynolds participates in two steering group meetings for the Ofwat Water Efficiency Fund, where four 'prototype areas' for funding are discussed: actionable insights for customers, customer-side leakage, simplifying retrofit and data centres/ high volume users.

August 18: The Association calls for members to participate in discussions regarding Packaging Extended Producer Responsibility with the CPA's Construction Packaging Group.

September 11: The Association attends the latest Packaging Extended Producer Responsibility with the CPA and other trade associations to discuss the proposed strategies that could be acceptable to Defra.

September 16: As part of the Healthcare and Adaptations Special Interest Group meeting, a range of speakers addressed how remote water monitoring can make a difference in water savings.

September 17: At the Association's Connect Conference, Tim Smedley, environmental journalist and author of The Last Drop, challenged delegates to think big on water stewardship.



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INDEPENDENT WATER COMMISSION FINAL REPORT: IMPLICATIONS FOR THE BATHROOM SECTOR



Introduction: A water system under strain

In July 2025, the UK Government announced the most sweeping overhaul of water sector regulation since privatisation, in response to the Independent Water Commission's final report. It's published against a backdrop where public trust in water companies has collapsed amid high-profile revelations of persistent sewage discharges, with a perception that profits take precedence over performance. Despite being one of the most privatised utility systems in Europe, the water sector has faced criticism for underinvestment in infrastructure, leaving rivers and coastlines heavily polluted and households vulnerable to supply disruptions.

The independent report from Sir John Cunliffe, which condemns the sector as "broken," recommends a sweeping restructuring of governance, finance, and accountability, with improvements in

environmental performance, water quality, regulations and infrastructure. In response, the Government has accepted all 88 recommendations and announced reforms that will abolish Ofwat and create a single, powerful regulator.

This briefing will outline the proposals of the report and what could be expected from the Government's new Water Bill expected next year.

What's in the report?

The huge restructuring and transition to the new regulatory framework is expected to take two years. Steve Reed, the previous Defra Secretary of State, emphasised that these reforms, the most significant since privatisation, are essential to restoring public trust and addressing the sector's failures without resorting to nationalisation.

Ofwat, the economic regulator, is accused of failing to enforce environmental and performance standards robustly, while responsibilities for water quality, infrastructure planning, and environmental oversight are fragmented across multiple agencies. This patchwork has led to blurred accountability, delayed infrastructure improvements, and weak consumer protections.

Understanding how regulation will change and how it will impact investment, efficiency, and consumer behaviour is critical for all members.





Implications for the bathroom sector

The compulsory rollout of smart meters will ensure water consumption data is visible to households, making consumers more conscious of efficiency. This is likely to accelerate demand for water-efficient products. Members should expect greater scrutiny from both regulators and customers on product claims, with measurable efficiency performance becoming central to purchase decisions.

The pledge to halve sewage pollution by 2030 is likely to tighten requirements on wastewater volumes and treatment. While the reforms do not directly legislate for product design, they could exert indirect pressure on manufacturers to support water-saving innovations as part of a whole-system approach. This could include closer alignment with building regulations and the Future Homes Standard, positioning bathrooms as part of a wider sustainability strategy. Additionally, the two-year transition period creates a regulatory grey zone. Ofwat's £100 million Water Efficiency Fund, designed to stimulate innovation, remains unresolved despite Ofwat's imminent closure. The future of such schemes is uncertain, potentially slowing investment in bathroom product efficiency initiatives in the short term. Manufacturers may face difficulty planning against shifting regulatory expectations until the new body's remit is fully established.

Of course, with fundamental reform of the water sector, a mix of risks and opportunities will arise.

Risks and opportunities



- Potential bill increases as infrastructure investment costs are passed on to consumers, reducing discretionary spend on premium bathroom products.
- Centralised regulation could overlook regional supply variations, creating uneven challenges for product performance.
- Transitional uncertainty may delay efficiency funding or standards-setting, creating confusion for manufacturers and consumers alike.
- Stronger water quality and infrastructure improvements will enhance baseline product performance.
- Smart meters will make water efficiency a highly visible differentiator in the market.
- Clearer accountability in the sector should reduce the burden of manufacturers being unfairly blamed for problems rooted in supply.
- Engagement with the new regulator offers an avenue for the bathroom sector to influence standards that align with real-world product use.

Conclusion

This report represents a watershed moment for the UK water sector. It acknowledges decades of underperformance, public dissatisfaction, and fragmented oversight, and proposes a radical restructuring designed to restore credibility, drive investment, and protect consumers.

For bathroom manufacturers, the implications are clear: product performance, consumer expectations, and market opportunities are directly tied to the future of water governance. The sector must use the next two years not only to adapt but to actively influence the new regulatory landscape, ensuring that bathroom products are recognised as central to achieving sustainable, efficient, and consumer-friendly water outcomes.

The Association will monitor the establishment of the new regulator and continue to engage with the government as the anticipated Water Bill develops.

Further reading:

Independent Water Commission Final Report



WATER-SMART HOUSING FOR A CHANGING CLIMATE: A GHA GUIDE

Introduction

The UK faces a looming water deficit, with many regions already classed as water-stressed. The Future Homes Hub Water Ready report (2024) set a pathway to reduce water use in new homes to 90 litres per person per day by 2035. In the meantime, forward-leaning developers and local authorities are pressing for measurable action sooner, with some planning applications already contingent on water neutrality.

The Good Homes Alliance (GHA) has stepped into this gap with its second

Designing for a Changing Climate guide. Framed as a practical resource, it offers architects, developers, and contractors a toolkit to design "water-smart homes." It combines model specifications with case studies and stakeholder reflections, and its core proposition is a fittings-based approach to water efficiency.

For housing professionals, the guide positions fittings as the linchpin of watersmart housing, hoping to raise awareness of water efficiency and its urgency. For bathroom manufacturers, it presents an opportunity for innovative, water-efficient products to take centre stage.

The GHA's approach: Fittings first

At the heart of the GHA guide is the principle that litres-per-person-per-day (I/p/d) targets must be underpinned by fittings-level performance, following Waterwise's golden rule: 'minimise demand first, then offset the rest.'

Suppose the Government's house-building aims are to be met (1.5 million is looking increasingly unrealistic). In that case, new developments need to address water supply by reducing our daily usage, reusing water where possible, and offsetting the remaining water demand within the local water resource zone.

The guide provides housebuilders with suggested specifications for shower flows of up to 7L/min, with an openness to heat recovery technologies, WCs with a single-flush, minimum 4.5L dual flush, siphon mechanisms over flush valves, plus flow rates for taps and bath sizes.

This fittings-based model aligns with the anticipated mandatory water labelling and also mirrors policy signals from progressive regions such as London and Sussex, where planning approval increasingly depends on demonstrated fittings performance.

"The guide positions fittings as the linchpin of water-smart housing, hoping to raise awareness of water efficiency and its urgency."

Where the guide falls short

Product Pressure and Flow Requirements

Consumer Behaviour and Performance

While flow-rate caps are highlighted, the realities of pressure and system performance are overlooked. Manufacturers recognise that reducing flow without considering pressure, pipe sizing, or user experience can lead to product failure or customer dissatisfaction. A 7L/min shower may function differently in a high-rise apartment compared with a suburban home with variable mains pressure. The guide's omission of this nuance could create unrealistic expectations for developers and consumers alike.

The guide sidelines consumer behaviour, yet occupant use patterns are decisive in whether fittings deliver intended water savings. Evidence from dual-flush WCs demonstrates this gap: poor consumer understanding and usability issues can result in higher rather than lower consumption. Without user-centred design and behavioural insights, fittings-based specifications alone will not achieve neutrality goals.

The guide reinforces that bathroom fittings are central to achieving national water targets. By embedding flow limits and model specifications into design practice, the GHA effectively sets a de facto benchmark for developers and planners (should they adopt the guidance, of course).

However, there are opportunities for innovation and leadership by manufacturers:

What should manufacturers prioritise:

- Developing fittings that balance low flow with acceptable pressure and performance.
- Designing user interfaces that minimise misuse and support intuitive operation, especially for dual-flush WCs and showers.
- Investing in evidence-based testing that demonstrates real-world savings, building credibility beyond the guide's assumptions.
- Exploring synergies with smart metering, digital monitoring, and feedback tools, ensuring occupants understand their usage.

Implications for bathroom manufacturers

As local authorities and water companies begin to link planning and incentives to fittings performance, the sector faces both challenges and opportunities. Manufacturers who align with (and improve upon) these product specifications could find themselves well-placed for inclusion in procurement frameworks and developer partnerships. Conversely, those who ignore the emerging narrative risk being excluded from projects where water neutrality is enforced.

With mandatory water labelling on the horizon and updates to Part G expected, the sector must anticipate stricter requirements. The GHA's fittings approach is a signal of what's to come, and our sector must be ready to meet demand with innovative, proven water-efficient technologies.

For Bathroom Association members, the key takeaway of the report is this: the success of ambitious water neutrality targets hinges on bathroom fittings. However, ignoring poor water pressure and consumer behaviour is a concern. While water-efficient fittings are a critical element, housebuilders must also be aware of water pressure and employ rainwater harvesting, greywater recycling, and sustainable drainage systems (SuDS) to mitigate water resilience concerns fully.

Further reading

GHA Water-Smart Housing for a Changing Climate guide Future Homes Hub Water Ready report



RAISING

STANDARDS



July 11: The Association secretariat hosted a meeting of interested stakeholders to discuss the options required to find an alternative to the 'wet-testing' of water fittings for highrisk areas within hospital settings as part of the New Hospital Programme.

July 23: The Association's Technical Director, Andy McLean, attends a CEN technical meeting to discuss progress in the Construction Product Regulations standards programme.

August 7: The secretariat attends the CLC Product Standards and Regulatory Alignment Group meeting.

September 5: Defra informs the Association that the introduction of the Mandatory Water Efficiency Labelling (MWEL) scheme is now expected in early 2026.

September 16: As part of Insights Live, the Association hosts a day of technical meetings including updates on certification, CPR, pEPR and PFAS.

September 17: At the Association's Connect Conference, Amanda Long, CEO of the Construction Product Information Initiative, highlighted the urgent need for greater transparency and integrity in product data.

September 29: Andy McLean attends the TC 163 WG3 meeting in Berlin to determine the work requirements by the Association to develop standards for sanitary appliances through "Fast Track" by agreement with CEN for EU CPR.

September 30: The Association and members meet with NHS Estates to discuss air testing of non-TMV fittings, cleansing solutions, and process control measures, to ensure components do not become a source of possible infection.



Are your products part of the problem? The compliance paradox is real, let's fix it together.



In the UK, it's legal to sell water fittings that don't comply with the Water Supply (Water Fittings) Regulations 1999. But here's the paradox: installers and homeowners, not manufacturers, are held legally responsible.

NSF research reveals:

49% of homeowners have installed water fittings in the last 5 years 52% of homeowners have never heard of the regulations

80% never check if fittings are compliant

30% wrongly assume all products sold in the UK are compliant

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BRIDGING THE SKILLS GAP FOR WATER REUSE IN THE UK

New research conducted as part of the Enabling Water Smart Communities (EWSC) project suggests that water shortages could cost the UK economy £25 billion in undelivered housing in the next five years. Yet, if new homes are designed as "water smart," almost £20 billion of that value could be recovered.

Central to this vision is water reuse for non-potable uses. Alongside reducing demand, reuse technologies also improve flood resilience by capturing stormwater and limiting peak flows into drainage systems.

Despite the clear case for action, a significant barrier remains: the UK's workforce and supply chain lack the necessary skills to deliver water reuse systems at scale. A new report by Waterwise, produced under the EWSC project, makes clear that unless this gap is addressed, ambitions for water-smart housing and resilient communities will not be realised.

"While many plumbers are technically skilled, few have the necessary training in water reuse technologies, dual-pipe systems, and the prevention of cross-contamination."

A shortfall of skills in the plumbing industry

The Waterwise report, 'Bridging the skills gap for water reuse in the UK', highlights that the plumbing profession is at the heart of the skills challenge. While many plumbers are technically skilled, few have the necessary training in water reuse technologies, dual-pipe systems, and the prevention of cross-contamination. Even experienced tradespeople often lack familiarity with the Water Fittings Regulations and the specific health and safety risks associated with integrating potable and non-potable supplies.

Furthermore, the rise of fast-track training schemes risks introducing underqualified individuals into the workforce who may attempt to install water reuse systems without adequate expertise.

The report also stresses that skills gaps extend far beyond plumbing. Architects and designers often fail to make adequate space for reuse systems in building plans. Civil contractors and engineers may lack the technical knowledge to integrate these systems effectively.

Meanwhile, sales staff and developers are often unable to explain water reuse technologies to homeowners, which contributes to low uptake and a lack of trust. This underlines the need for cross-disciplinary understanding: every professional involved, from planning through to maintenance, must share a baseline knowledge of relevant health, safety, and regulatory standards.

Professionalisation and accreditation

A central theme of the report is the call to professionalise the industry.
Accreditation frameworks and Competent Person Schemes (CPS) are proposed as mechanisms to formalise competence and build trust.

The report recommends a tiered accreditation model, covering basic domestic installations through to more complex commercial systems. This could provide flexibility while ensuring consistent standards. By linking competence to certification, it could also support regulatory compliance and reduce the burden on water inspectors.

However, Waterwise acknowledges that upskilling faces multiple barriers, as seen in Figure 1.

Upskilling faces multiple barriers

Skills shortages

According to the UK Trade Skills Index, more than 70,000 new plumbers will be needed by 2032 to meet demand.

Training bottlenecks

Apprenticeship completion rates remain low, with only 13% reaching Level 3. Some further education colleges are scaling back plumbing provision, reducing capacity at precisely the wrong time.

Regulatory uncertainty

Most water regulations were written with potable water in mind, leaving water reuse in a grey area. Without a consistent framework, it is difficult to standardise training content.

Cost and time pressures

Employers and tradespeople alike face financial and logistical challenges in dedicating time to training.

Despite these challenges, the report highlights opportunities to link water reuse to the national green jobs agenda and to secure government and industry investment for training programmes. At present, water efficiency and reuse are underrepresented in green jobs strategies, despite their clear contribution to decarbonisation and resilience.

The EWSC initiative is also developing a "single source of truth" guidance document to consolidate regulations, standards, and responsibilities. Resolving these ambiguities will be essential before a comprehensive skills strategy can be rolled out effectively.

Implications for the bathroom sector

Our sector has consistently raised concerns about the skills gap among plumbers fitting innovative water-efficient products, and the Waterwise findings provide strong evidence to support this position.

Bathroom products depend on correct installation and integration. If plumbers are not trained to handle these systems, obvious risks arise around performance, public health and uptake of innovative products.

Manufacturers are already investing heavily in product development and innovation, but without parallel investment in workforce training, the benefits of these technologies cannot be fully realised.

What we can do

Collaborate with training providers

Support the Chartered Institute of Plumbing and Heating Engineering (CIPHE) and the Institute for Apprenticeships and Technical Education (IfATE) as they revise Level 2 and 3 plumbing qualifications to integrate water reuse.

Expand manufacturer-led training Many companies already provide CPD and on-site training. Expanding these programmes will help fill gaps left by further education colleges and ensure correct installation of products.

Support accreditation schemes

Endorse and promote industry-wide accreditation or certification frameworks, helping to professionalise the workforce.

Engage with policymakers

Lobby for water reuse to be recognised within national green skills and funding strategies, unlocking financial support for training.

Promote public awareness

Educate homeowners about the benefits of water reuse systems and the importance of using qualified installers, building demand for skilled professionals.



The Waterwise report provides a stark but constructive assessment: the UK is not yet ready to deliver water reuse systems at scale, but the pathway to bridging this gap is clear.

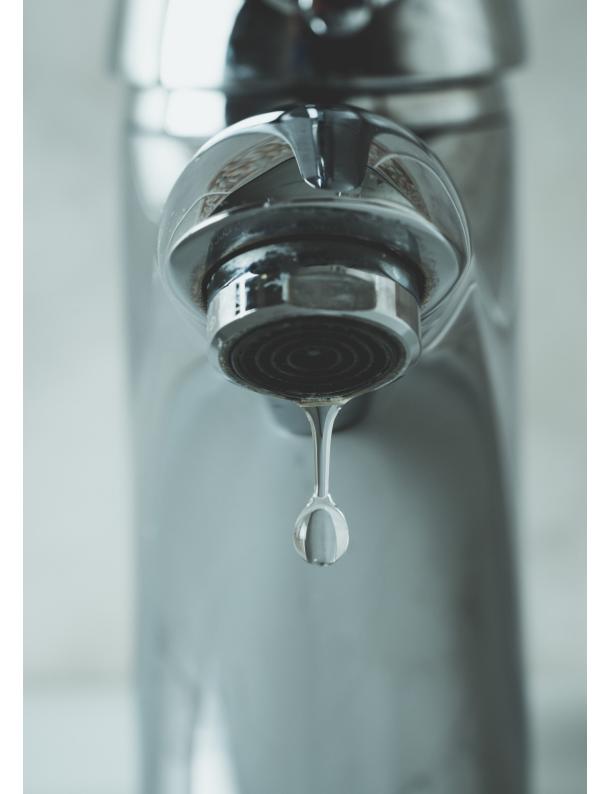
For the bathroom sector, the findings are particularly relevant. Without properly trained plumbers, innovative water-efficient products cannot be fitted correctly or safely, undermining both performance and consumer trust.

Yet the opportunities are equally significant. By embedding water reuse into national skills programmes, clarifying the regulatory framework, and professionalising the industry through accreditation, the UK can build the workforce required for water-smart housing.

The bathroom industry must remain proactive. By doing so, we can ensure that our sector is not only part of the solution to water scarcity, but also at the forefront of delivering the water-efficient, resilient housing the country urgently needs.

Further reading:

Bridging the skills gap for water reuse in the UK



GOVERNMENT CONSULTATION ON WATER EFFICIENCY STANDARDS

The challenge: Water scarcity and housing delivery

The government faces a dual challenge of delivering its promise of 1.5 million new homes in this parliament while responding to the growing issue of water scarcity. The past three years have seen repeated drought declarations, with seven consecutive months of below-average rainfall in several regions, leaving five areas officially classified as being in drought.

Water scarcity has already acted as a bottleneck for housing developments. Planning applications have been stalled in water-stressed regions, such as Cambridge and north Sussex, because demand outstrips the available supply. Without intervention, these constraints will continue to block growth.

For the government, water availability is now recognised as a critical enabler of housing delivery, and the launch of the consultation to update Water Efficiency Standards is a critical moment for our sector.

The consultation: Raising Water Efficiency Standards

In the words of Defra, "Growth is one of the key ambitions of this Government, with a target of building 1.5 million new homes over five years. Government recognises that water availability is essential to enable this growth."

On 23 September 2025, Defra, working with the Ministry for Housing, Communities and Local Government (MHCLG) and the Building Safety Regulator, launched a 12-week consultation to update Building Regulations 2010, Part G. The consultation closes on 16 December 2025.

The proposals aim to tighten water efficiency standards for new homes, reflecting both the Plan for Change growth strategy and the Environmental Improvement Plan commitments. The consultation includes the following options:

Options included in the consultation

Mandatory Standard: Reduce from 125 litres per person per day (I/p/d) to 105 I/p/d. Optional Technical Standard: Reduce from 110 I/p/d (currently applied in areas of water stress) to 100 I/p/d. Measurement
Method: Revise the
water calculator
and/or adopt a
fittings-based
approach.

Guidance: Update
Approved Document
G (AD-G), with
refreshed references
and standards to align
with current industry
practice.

According to the government, these measures could save families in new homes around £111 a year on combined water and energy bills. They also aim to remove the water-related barriers that are preventing thousands of homes from being built.

Part G of the Building Regulations

Part G of the Approved Documents (AD-G) governs sanitation, hot water safety and water efficiency in buildings. Its current water efficiency requirements are widely considered outdated. A refreshed AD-G would ensure that water efficiency standards keep pace with industry practice, innovation, and the scale of the national water challenge.

Alignment with growth strategy

By tightening standards, the government is seeking to unlock stalled developments and reduce per capita water use. The consultation directly links water efficiency to the Plan for Change growth agenda, framing technical standards as part of a wider economic strategy.

The Future Homes Hub has long argued that water shortages pose a significant threat to housing delivery. In its 2024

Water Ready report, it set out a water efficiency roadmap for the new homes sector. The report called for progressively higher efficiency standards, combined with infrastructure investment and demand management, to ensure housing growth remains sustainable.

The consultation also recognises the role of innovation in water reuse and recycling. A Call for Evidence runs alongside the consultation to explore critical options such as rainwater harvesting for toilet flushing, greywater reuse systems and product development opportunities in water-saving technologies.

The Call for Evidence is an ideal opportunity for the bathroom sector to push for clarity surrounding the regulations for innovative products, such as recirculating showers.

The Independent Water Commission has already recommended greater integration of water reuse, and the government acknowledges the potential for the water, manufacturing and development sectors to drive this innovation, as seen in our other briefing in this edition of Insights.

Regulatory barriers to water reuse

While efficiency targets can be supported through water-saving products such as

dual-flush toilets, aerated taps and efficient showers, water reuse technologies remain constrained by the UK's current regulatory framework.

Current barriers to water reuse

Complexity and fragmentation

This applies across existing regulations, with no single, clear route for approval of water reuse systems. For instance, the Water Supply (Water Fittings) Regulations 1999, enforced by water companies, regulate fittings and pipework but can be a barrier to the approval of innovative reuse products.

Lack of standardisation

This makes it difficult to scale technologies such as greywater recycling or rainwater harvesting. While BS 8515:2009 (Rainwater Harvesting Systems) and BS 8525-1:2010 (Greywater Systems) exist, they are guidance rather than statutory requirements.

Lack of incentives

Unlike energy efficiency, where Part L is reinforced by incentives and net-zero targets, there is currently no comparable framework to promote the integration of water reuse technologies into mainstream housing.

These barriers limit the potential for innovative products to contribute to efficiency targets without compromising user experience. In many cases, consumers could benefit from water reuse solutions that maintain performance standards (such as flush volume or shower pressure) while reducing demand for mains supply.

The Association is working closely with government, regulators, and industry partners to address these issues. Our priority is to ensure that the regulatory framework enables the safe and practical deployment of reuse technologies, creating a pathway for bathroom products that deliver both efficiency and a high-quality user experience.

What this means for members

The Association welcomes this consultation as a vital mechanism to update standards. For our members, this represents a regulatory shift, with tighter efficiency targets that will shape product design, specification, and installation practices across the industry.

It's also an opportunity to lead innovation in solutions such as rainwater harvesting, fittings-based design approaches, and new technologies for reuse.

However, as mentioned in our briefing on the water skills gap, unless we can ensure installers are practised and certified in the knowledge required to fit and maintain new water systems, the ambitions of the new regulations could prove limiting.

This consultation is more than a regulatory update—it's a strategic pivot linking water efficiency directly to housing growth. The outcome will influence not only building regulations but also the scope for bathroom manufacturers to lead in innovation, from aerated taps and dual flush toilets to rainwater and greywater reuse systems.

The Association supports the government's direction, but we must work collaboratively to ensure that outcomes are workable, cost-effective, and aligned with the wider growth strategy. Raising standards must not only save water but also enable innovation and economic growth in the bathroom sector.





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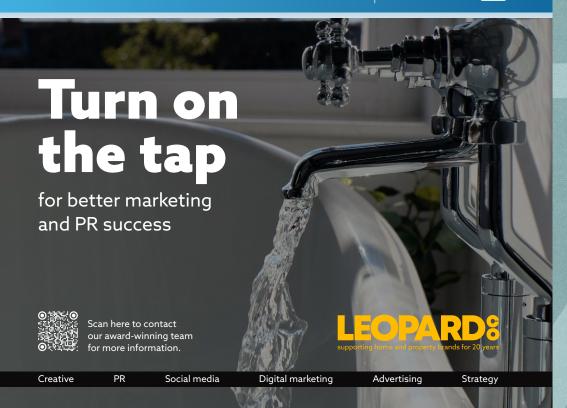




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UNDERSTANDING

& GROWING THE

MARKET

July 8: The Association briefed MPs and Peers at Parliament on our call for a statutory duty to provide public toilet facilities, alongside the BTA and other allies.

August 1: The Association meets with Welsh Water to partner on the Abergavenny Project which examines water use for 3,500 homes as part of smart town research.

August 18: The Association writes to Daniel Francis MP, welcoming his case for action regarding Changing Places toilets and highlighting how our recent work on improving wider public toilet provision can complement and strengthen his advocacy.

September 16: The Association hosts its Marketing Meeting at Insights Live, tackling a range of issues, including how retailers and manufacturers can partner for success.

September 17: At the Association's Connect Conference, Anna Leach, Deputy Chief Economist at the CBI, informed delegates that while challenging economic headwinds remain, stable economic growth in 2026 is still on the cards

UK-INDIA FTA: TRANSFORMING THE **BATHROOM AND** PLUMBING SUPPLY **CHAIN**



As the United Kingdom and India move Trade Agreement (FTA), one sector stands out as an unexpected but powerful driver of bilateral trade: the bathroom and plumbing supply chain.

Behind the glossy tiles and gleaming fixtures lies a multibillion-dollar opportunity that could redefine design, sustainability, and manufacturing across both nations.

A rapidly expanding market

India's bathroom industry has evolved from a basic utility sector into a booming lifestyle market. The numbers tell the story. The bathroom vanities market, currently valued at around \$2.4 billion, is projected to reach \$4.3 billion by 2030, growing at an impressive 10.4% CAGR. The tiles and sanitaryware market is forecast to rise from \$9.35 billion in 2024 to \$16.8 billion by 2033, while the system bathrooms segment is set to expand to \$27.17 billion by 2029.

This rapid growth is powered by four major drivers: urbanisation, government programmes, rising affluence, and technology adoption. As millions move into new cities and housing developments, demand for modern, hygienic, and aesthetically pleasing bathrooms has surged.

Flagship initiatives like the Swachh Bharat Mission and Smart Cities Programme have intensified focus on sanitation and water management, while India's rising middle class continues to seek aspirational, lifestyle-oriented bathroom solutions.

The UK's competitive edge

The UK bathroom industry, valued at £2.3 billion annually, brings decades of innovation, craftsmanship, and sustainable design practices to the table. British companies lead in smart bath fittings. IoT-enabled systems, and water-saving technologies, areas that align closely with India's emerging needs.

Brands such as Victorian Plumbing and Roca UK have already demonstrated how digital retail and advanced manufacturing can redefine customer experiences. From classic to contemporary design aesthetics, the UK's design versatility matches India's culturally diverse consumer landscape — where regional tastes can vary as much as the climate.

How the FTA changes the game

The FTA is expected to slash tariffs by up to 15% across key product categories, including taps, valves, pumps, tiles, and sanitaryware.

For instance, tariffs on ceramic sanitaryware (HS Code 6910) could fall from 12% to as low as 3%, while bathroom accessories (HS Code 7324) may drop to just 4%.

This tariff relief translates into a potential 25% cost reduction for UK manufacturers sourcing components from India. For Indian exporters, it means smoother access to UK and EU markets, especially as UK distributors could use the country as a re-export hub for Indian products.

The result is a mutually beneficial ecosystem where UK innovation meets Indian scale and cost efficiency — a combination that could reshape global bathroom supply chains.

Opportunities across the value chain

Every segment of the supply chain stands to benefit:

- UK manufacturers can export premium fittings, thermostatic valves, and shower systems, while importing competitively priced Indian tiles, pipes, and valves to lower production costs.
- Importers and retailers can create bundled offerings combining British design with Indian manufacturing — to target mid-market and premium consumers.
- Distributors and wholesalers can establish exclusive partnerships with Indian producers or assemble installer-ready packages for contractors.
- Designers and specifiers can collaborate on hybrid systems, leveraging UK digital design tools and India's fast-growing real estate and hospitality sectors.

Sustainability and innovation: A shared priority

Both nations share a growing commitment to sustainability. UK expertise in waterefficient taps, energy-saving pumps, and smart plumbing systems is increasingly relevant to India's urban future. Meanwhile, India's expanding capacity for eco-materials offers UK companies a greener sourcing base.

Collaborative R&D projects on greywater recycling, IoT-enabled water management, and low-carbon manufacturing could position the UK and India as global leaders in sustainable bathroom technology. For example, Roca's RocaProtect® platform demonstrates how digital monitoring can reduce water waste — a concept ripe for broader Indo-UK collaboration

Navigating regulations and market complexity

Market entry, however, requires navigating a patchwork of regulations. In the UK, compliance revolves around WRAS, UKCA, and Part G water efficiency regulations. In India, BIS certification and adherence to IS codes are often mandatory.

Local adaptation is equally crucial — product design must consider India's water pressure variability, climate conditions, and consumer price sensitivity. Establishing trusted local partnerships for distribution, installation, and after-sales service will be the linchpin of success.

Strategic roadmap for UK businesses

For UK companies, a phased approach is recommended:

- Market Assessment & Certification: Secure BIS approvals and conduct regulatory gap analysis.
- Partnership Development: Collaborate with Indian suppliers, distributors, and technology firms.
- Hybrid Supply Chain Integration: Combine UK design leadership with Indian cost advantages.
- Sustainability Alignment: Embed water-saving and energy-efficient technologies.
- E-commerce Expansion: Tap into India's fast-growing online marketplace for home and lifestyle products.

The road ahead

The UK-India FTA is more than a trade deal — it's a blueprint for industrial cooperation and sustainable growth. For the bathroom and plumbing supply chain, it promises to unlock innovation, efficiency, and environmental progress at scale.

As both nations accelerate toward a cleaner, smarter, and more connected future, this sector exemplifies how thoughtful trade policy can translate into tangible economic and social benefits.

As one industry expert noted:

"The UK-India FTA represents a transformational opportunity for the bathroom and plumbing supply chain — creating pathways for growth, innovation, and sustainable development across all market segments."

In essence, what was once a niche industry could now become a symbol of how the UK and India, together, are reimagining the everyday spaces of modern life — one bathroom at a time.

Feature supplied by Bhaskar Thota, Associate Director of the <u>UK India</u> Business Council

Bhaskar also presented a talk at the Bathroom Association's Insights Live event in September 2025. The slides from that event are available <u>here</u>.



GOVERNMENT PLANS TO SUPPORT SMES

Introduction

Small and medium-sized enterprises (SMEs) account for over 99% of all businesses, employ around 16.7 million people, and generate more than half of private sector turnover. From local tradespeople and family-run firms to innovative start-ups and high-growth manufacturers, SMEs fuel job creation, drive innovation, and sustain communities across every region of the country.

Yet despite their central role in economic growth, SMEs (employing fewer than 250 people) often face systemic barriers: late payments from larger firms, difficulties accessing affordable finance, and regulatory systems that favour bigger players. These challenges not only stifle growth but, in many cases, threaten business survival.

Recognising this, the Labour Government launched its Small Business Plan in July 2025, designed to deliver the most comprehensive package of SME support in a generation. The plan focuses on tackling late payments, widening access to finance, and creating a fairer, more supportive environment for small businesses to thrive.

Aims of the Small Business Plan

The central reform in the plan is to tackle the chronic issue of late payments—a problem costing the UK economy an estimated £11 billion annually and leading to the closure of 38 businesses every day.



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Prime Minister Keir Starmer said:

"From builders and electricians to freelance designers and manufacturers—too many hardworking people are being forced to spend precious hours chasing payments instead of doing what they do best – growing their businesses."

The new laws would give the Small Business Commissioner stronger powers to wield fines, potentially worth millions of pounds, against the biggest firms that persistently choose to pay their suppliers late.



The Commissioner's new powers include carrying out spot checks and enforcing a 30-day invoice verification period to speed up resolutions to disputes. The upcoming legislation will also introduce maximum payment terms of 60 days, reducing them to 45 days, giving firms certainty they'll be paid on time. For some Bathroom Association members, this could significantly improve financial resilience and reduce the risk of insolvency caused by delayed income.

Large companies, however, may face increased operational costs and administrative burdens to ensure compliance with the new payment terms and reporting requirements.

Considering our sector, the support this plan offers small businesses is an optimistic path for a stronger bathroom supply chain.

Boosting access to finance

Alongside payment reforms, the plan recognises that SMEs still struggle to secure affordable finance, and therefore will offer a range of financial tools.

The government-backed guarantee under the ENABLE scheme encourages lenders to offer better terms and lower interest rates to SMEs.

Easier access to investment for product development, expansion, and sustainability upgrades, and more favourable credit terms when borrowing to finance plant, machinery, or innovation, is a welcome direction from the government.

Key measures for financial support

£4 billion finance package for small businesses

69,000 Start-Up Loans and mentoring support for new entrepreneurs

> £1 billion boost for new businesses, encouraging fresh market entrants

£3 billion uplift to the British Business Bank (BBB) through the ENABLE scheme, increasing total lending capacity to £5 billion. Additionally, a stronger entrepreneurial pipeline feeding into the sector could potentially spur new partnerships, service providers, and supply chain entrants, enabling further growth within the bathroom sector.

The Plan also includes wider initiatives designed to create a growth-friendly environment for SMEs, including a revamped Board of Trade, intended to help SMEs expand export opportunities, and provide access to essential advice and support from the Business Growth Service. From April 2026, retailers with rateable values below £500,000 should also see permanently lower business rates.

While not all measures will directly affect members, they represent a holistic shift in government thinking—creating a landscape where SMEs are seen as the backbone of economic renewal.

What this means for Association members

Greater policy support for small **Enhanced financing Opportunities to** Improved cash flow opportunities, business growth export more under a reliability through especially for within a more renewed Board of stricter late payment expansion and stable Trade emphasis. enforcement. sustainability macroeconomic projects. framework.

The Small Business Plan represents a welcome opportunity for SMEs in the bathroom sector. Late payments have long been a systemic problem, with cascading effects across supply chains.

Furthermore, despite repeated calls by the Association for help with export opportunities, our efforts have not resulted in progress. The new Board of Trade could provide that much-needed boost for our sector and expand export opportunities.

As ever, the devil is in the detail, but for now, members should review contracts and payment terms with larger clients to ensure compliance with the new legislation.

Additionally, exploring new financing opportunities through the British Business Bank could be a worthwhile endeavour to strengthen financial resilience and grow your business.

The Association will ensure members are fully informed and supported as these reforms take shape.

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