



TAP INTO TOMORROW

DATE: OCTOBER 2023

Dept.	Ask	More
Business & Trade	Support the development of Code for Construction Product Information	2.1
	Make it illegal to sell, as well as install, products that don't comply with 'Regulation 4'	2.2
	Increase enforcement activity and penalties for selling non-compliant water fittings and construction products	2.2
	Establish a framework for cooperation between companies on supplier and product environmental assessment	4.1
	Allow all sectors access to resources to increase their visibility in potential export markets, rather than picking favourites	6.1
Environment Food & Rural Affairs	Remove WCs from the Construction Products Regulation	2.1
	Align Water Supply (Water Fittings) Regs and Construction Products Regulations with current standards	2.1
	Make it illegal to sell, as well as install, products that don't comply with 'Regulation 4'	2.2
	Make TMVs mandatory for mixer showers and bath fills	2.3
	Introduce title protection, licencing and mandatory CPD for plumbers and installers	2.4
	Support the use and display of the Unified Water Label	3.1
	Stop leaky loos by updating existing standards with industry	3.2
	Establish a taskforce to allow recirculating showers in the UK	3.3
	Clarify to enforcers and approvals schemes that standards demonstrate compliance with 'Regulation 4'	3.4
	Make future water efficiency policies data-informed	3.5
	Lead a public information campaign on water scarcity	3.6
	Promote and incentivize water-efficiency retrofits	3.6
	Work toward a higher Guaranteed Service Standard on water pressure	3.7

Levelling Up, Housing & Communities	Remove WCs from the Construction Products Regulation Construction Products Regulations with current up-to-date standards	2.1
	Support the development of Code for Construction Product Information	2.1
	Align Water Supply (Water Fittings) Regs and Construction Products Regulations with current standards	2.1
	Make TMVs mandatory for mixer showers and bath fills	2.3
	Introduce title protection, licencing and mandatory CPD for plumbers and installers	2.4
	Commission an independent review on public toilet provision	5
	Require all tier 2 councils to develop a local public convenience plan	5
	Establish a national scheme for business rate relief for businesses offering use of their washroom facilities to the general public	5
	Commission an independent review on housing adaptations	7.3
Health and Social Care	Retain and reinforce guidance directing the use of TMVs in healthcare environments	7.1
	Conduct a public information campaign on risk reduction of 'toilet plume' and legionella	7.2
	Commission an independent review on housing adaptation	7.3
Culture, Media and Sport	Invest in a public information campaign on water scarcity	3.6
	Invest in a public information campaign on risk reduction of 'toilet plume' and legionella	7.2
Education	Introduce title protection, licencing and mandatory CPD for plumbers and installers	2.4
	Establish a taskforce to identify and overcome barriers to apprenticeship recruitment in fragmented sectors	6.2
Energy Security & Net Zero	Establish a framework for cooperation between companies on supplier and product environmental assessment	4.1
	Support the Construction Leadership Council's retrofit strategy	4.2
	Continue and accelerate efforts to decarbonise the grid	4.3

1. Introduction

The bathroom sector, often overlooked, plays a crucial role in the daily lives, health, and safety of the British public. The functionality, hygiene, and design of bathroom products directly impact the quality of life for everyone in the nation. As representatives of this vital industry, the Bathroom Manufacturers Association (BMA) is dedicated to promoting its significance and advocating for continuous improvement.

“Our sector makes a difference, and with political support, we can make an even greater contribution to the UK.”

As the UK approaches a General Election, this paper outlines our key actions and recommendations for the next government. We cover a wide range of topics, including raising industry standards, our path to decarbonization, health and well-being, and the barriers to growth in the industry. Through our proposed solutions, we aim to provide a roadmap for a brighter, safer, and more prosperous future for all.

The bathroom industry may not immediately come to mind when policymakers consider ways to achieve positive change, but it is important to recognise our impact. The humble WC has been the most successful public health innovation in human history. During lockdowns, the bathroom became a sanctuary in the home for many people, public washrooms are essential social infrastructure and bathroom adaptations are essential in helping individuals maintain their independence and dignity. Our sector makes a difference, and with political support, we can make an even greater contribution to the UK.

Tom Reynolds

Chief Executive



2. Raising Standards

Regulating products in our industry can be a complex endeavour. Bathroom products, specifically, fall at the intersection of regulations governing consumer goods, water supply protection, and construction products. Unfortunately, these regulations often prove excessively convoluted, making it challenging for manufacturers to comprehend, let alone consumers. Consequently, numerous non-compliant bathroom products flood the UK market with impunity, undermining responsible manufacturers, deceiving consumers, and potentially jeopardising their safety. To address these issues, we propose implementing the following actions, which will help elevate industry standards.

2.1 Make compliance straightforward

The industry faces a major inconvenience due to the dual regulation of certain products. WCs, for example, are subject to regulations under both the Water Supply (Water Fittings) Regulations 1999 and the Construction Products Regulation. These regulations sometimes conflict with each other, leading to confusion. One immediate action that should be taken is **to remove WCs from the Construction Products Regulation**, as they are already regulated elsewhere.

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Complying with the Construction Products Regulation (CPR) for all product categories is undeniably complex. Building on the recommendations of Paul Morrell and Annalese Day's post-Grenfell review, it is crucial to simplify the process of demonstrating compliance. The Code for Construction Product Information (CCPI) offers a potential solution. Its five principles - clarity, accuracy, contemporaneity, accessibility, and unambiguity - provide an effective framework for disseminating product information. With the support of key stakeholders, making the CCPI a normative benchmark for non-safety-critical products, such as bathroom products regulated under the CPR, will improve understanding and adherence to regulations. It is important for the next government **to endorse the development of the CCPI**.

**“product standards
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While regulations tend to remain fixed, product standards are regularly monitored and updated by industry experts to reflect ongoing innovation. To ensure relevance and practicality, the next government should encourage water companies in using **current standards** instead of outdated Test Code Sheets (in the Water Supply (Water Fittings) Regulations) or old designated versions of standards (under the CPR).



2.2 Serious market surveillance

Despite the establishment of the Office for Product Safety and Standards (OPSS) and a dedicated team for construction products, the bathroom industry continues to struggle with non-compliance and insufficient market surveillance. Local trading standards services have been significantly reduced, as funding has been redirected to other priority statutory services by councils. Merely setting regulations is insufficient; rigorous enforcement is the crucial element. Without it, unscrupulous businesses continue to bypass the rules, flooding the market with non-compliant products at the expense of credible companies and consumers.

The solution lies in three key aspects. Firstly, in relation to regulation four of the Water Supply (Water Fittings) Regulations, it is currently illegal to install non-compliant products. While products are covered by general safety rules. The responsibility lies with the wrong actors. The next government should impose a legal duty on retailers to ensure compliance with regulation 4, preventing non-compliant products from entering the market in the first place.

“it is currently illegal to install non-compliant products”

Secondly, the next government must intensify enforcement efforts, directing the OPSS to actively identify, investigate, and rectify breaches.

Lastly, to deter non-compliance, financial penalties should be significantly increased. By making the cost of bypassing regulations prohibitive, companies will be motivated to adhere to the established guidelines. The success of this approach can be seen in the enforcement of health and safety laws and recent sentencing guidelines.

Implementing a robust surveillance system supported by stringent penalties will not only level the playing field for all manufacturers but also enhance consumer confidence. Knowing that every product in the market adheres to the highest industry standards set by regulators will provide assurance and peace of mind.

2.3 Prevent Scalding

“20 individuals are reported to have died from scald-related incidents every year”

Scalding remains a pressing public health concern in the UK, with alarming statistics highlighting the need for preventive measures. According to the Health and Safety Executive, approximately 20 individuals are reported to have died from scald-related incidents every year. The elderly population is particularly vulnerable, being five times more likely to suffer fatal burns or scalds compared to the general population. Tragically, hot bath water is the main cause of severe and fatal scalding incidents among young children.

A closer look at the data reveals the following:

- Nearly 92% of scald injuries treated in England during 2020–21 were classified as emergencies.
- The Child Accident Prevention Trust estimates that treating a severe bathwater scald costs a staggering £250,000.
- The British Burn Association reports that the NHS spends £20 million annually to deal with scalding incidents.

A viable solution to this widespread issue is the implementation of thermostatic mixing valves (TMVs). TMVs act as safety mechanisms in hot water systems, ensuring consistent and safe water temperatures from taps and showers. By automatically blending hot and cold water, TMVs maintain desired temperatures—typically ranging between 39°C and 43°C—regardless of any fluctuations in the hot water supply. TMVs have played a critical role in significantly reducing scalding incidents in healthcare settings since their introduction in the NHS estate.

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It is imperative for the next government to enact **legislation mandating the use of thermostatic mixing valves in residential properties** where there are mixer showers or bath fills. This proactive step will lead to a significant reduction in scalding incidents, protect our vulnerable populations, and alleviate the financial burden on our healthcare system.

2.4 Professionalisation of Installation

Ensuring high-quality installation is crucial not only for product standards but also for the safety and performance of the products themselves. Professional bodies, like the Chartered Institute of Plumbing and Heating Engineering (CIPHE), actively maintain lists of qualified installers, providing the public with access to proficient professionals. However, a regulatory loophole allows anyone to establish a plumbing business without qualifications. Similarly, there is no requirement for training or experience to claim the title of a bathroom installer. This has led to the emergence of rogue operators who compromise safety and quality.

To address these issues, the BMA advocates for the following:

1. **Title protection:** The government should introduce statutory licensing to reserve the title “plumber” for fully qualified professionals.
2. **Installer recognition:** Similar recognition should be given to “bathroom installer” for those registered with the British Institute for KBB Installation.
3. **Mandatory CPD:** Implement evidence-based, continuous professional development for the plumbing and heating industry, as well as for registered bathroom installers.

To prioritise safety and professionalism, tighter regulations and ongoing training are of utmost importance.



3. Seven Steps to Water Efficiency

Water is vital for human health, well-being, biodiversity, and the economy. It is also essential for the proper functioning of bathroom products manufactured by bathroom manufacturers. With the growing population and aging infrastructure, the UK's water system is facing unprecedented pressure. By 2050, an additional 4,000 megalitres (Ml) of water per day will be required in England. According to current policy, half of this demand must be met by reducing water consumption.

“the UK's water system is facing unprecedented pressure”

The statutory target is to reduce the use of public water supply in England per capita by 20% from the baseline reporting year figures of 2019 to 2020, by 31 March 2038. There are also interim targets for a reduction of 9% by 31 March 2027 and 14% by 31 March 2032. Achieving these targets will involve lowering average household water use to 110 litres per person per day, reducing leakage by 50%, and decreasing non-household water use by 15% by 2050. There are interim targets to be met along the way. Here, we present seven steps towards genuinely reducing household water consumption.

3.1 Step 1: Get behind the Unified Water Label

In 2022, Defra sought public input on plans to implement a new compulsory water efficiency labeling system. The Department is currently reviewing the valuable feedback received during the consultation and intends to introduce the new label by 2025.

It is worth noting that a water label already exists in the UK. The Unified Water Label, a voluntary initiative, offers comprehensive water and energy information for water-related products. Esteemed companies such as IKEA and branded manufacturers in BMA's membership have already embraced the UWL scheme to showcase the water usage implications of their products. With its water-use ratings and an easily accessible online database of product details, this label empowers customers, architects, specifiers, and end users to make well-informed decisions. Moreover, the UWL is supported by meticulous technical criteria and undergoes annual audits to ensure reliability.

Rather than investing two years in creating a new scheme similar to the Unified Water Label, it would be more prudent for the next government to leverage the existing infrastructure. By fostering collaboration among the government, manufacturers, and retailers, the ubiquitous display of the Unified Water Label can be ensured. If the next government deems it necessary to enact legislation to make labeling mandatory, **the Unified Water Label should serve as the primary means of compliance with any new requirements.**

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3.2 Step 2: Stop leaky loos using updated standards



Well-maintained dual flush toilets are an excellent water-saving device. Since 2001, most dual flush toilets in the UK have been equipped with drop valves, which allow for efficient water usage. However, one drawback of drop valves is the potential for continuous water flow due to limescale or debris interrupting the seal at the bottom. To address this issue, the industry has worked closely with the water sector to identify and remove the most leak-prone products from the market. New leak-proof solutions have emerged, providing alternatives that prevent both leakage and the problems associated with traditional siphons.

Detecting and fixing leaky drop valves can be a simple task if consumers are vigilant about identifying leaks. Smart meters, monitoring systems, and leak sensors can all play a role in alerting users to potential issues. Manufacturers have taken the lead in educating consumers about simple maintenance practices to fix toilet leaks, as seen in the #GetLavvySavvy campaign.

However, to permanently solve the problem of leaky toilets, it is crucial for the next government **to mandate officials to collaborate with manufacturers and standards institutions to update existing toilet standards.** This approach not only aims to eliminate leakage but also encourages the implementation of "delayed cistern filling," an underutilised method that can save even more water. The bathroom sector is fully prepared to support the evolution of higher product standards, allowing manufacturers the necessary time and space to innovate and improve.

3.3 Step 3: Allow recirculating showers in the UK

Recirculating showers are an innovative technology designed to reduce water waste. These showers recycle water without any loss in pressure by utilizing a return pipe connected before the shower waste. The recirculated water is effectively cleaned through a foam trap and carbon cartridge before being directed back into the showerhead. In addition to saving significant amounts of water compared to traditional showers, this technology also helps lower the energy costs associated with heating large volumes of fresh water. Recirculating showers are already available in the EU market.

However, it remains uncertain whether UK regulations permit the installation of such technology in UK homes. The Water Supply (Water Fittings) Regulations 1999, the Water Supply (Water Quality) Regulations 2010, and Building Regulations Approved Document G all contain provisions that could potentially restrict such installations. Resolving this ambiguity or modernizing the regulations is necessary before manufacturers can confidently introduce these game-changing products to the UK market.

To address this issue, it is recommended that the next **Government establish a task force comprising manufacturers, water companies, and approval schemes.** This task force should collaborate to obtain the required technical assurances, ensuring that recirculating showers meet the stringent standards expected in the UK. Additionally, the task force should propose any necessary clarifications or legal changes to facilitate the successful introduction of these innovative products.

3.4 Step 4: Bring fittings enforcement up to date

The Water Supply (Water Fittings) Regulations 1999 make reference to a specification approved by the regulator in several instances. These specifications, known as 'Test Code Sheets', were created almost 25 years ago alongside the Regulations themselves and are now showing their age. In contrast, British (BS) and European (EN) standards have been regularly reviewed and updated by expert panels to ensure they reflect the latest advancements.

According to Regulation 4(2), water fittings are considered to be of an appropriate standard if they conform to a standard or regulator's specification. However, some enforcers and approval schemes prioritize the latter, resulting in the use of outdated test code sheets to determine compliance. This poses a problem as these old test code sheets do not take into account 25 years of product development, hindering the introduction of water-efficient innovations in the market. A prime example of this is smart duty-flush taps, which have the potential to save water and money in the NHS while reducing risks associated with legionella and pseudomonas.

To address this issue, the next government should **clearly communicate to enforcers and approval schemes that it favours the use of standards** to demonstrate compliance. Minor amendments to the Water Supply (Water Fittings) Regulations 1999 may be necessary to eliminate any ambiguity. This would promptly establish a more modern regulatory framework, unlocking opportunities for product innovation in water-efficient fittings.

3.5 Step 5: Make better use of data

Achieving the reduction of domestic water consumption, in accordance with statutory targets, cannot be accomplished through technology alone. It necessitates changes in residents' water usage behaviours, such as taking shorter showers, reducing the frequency of baths, utilizing WC dual flush buttons correctly, and turning off running taps. Water companies and NGOs have made extensive efforts to modify behaviours over the course of decades, yet per capita consumption has continued to rise. It is imperative that we take a different approach; we propose implementing data-driven interventions.

Advancements in technology now allow for the collection of big data

Advancements in technology now allow for the collection of big data and insights into consumers' water usage behaviours. Significant research, supported by BMA, has been proposed to understand the impact of various messaging, prompts, types of fittings, and bathroom environments on showering behaviours and water usage. Similar technologies can gather data on every aspect of water usage in households. Furthermore, the implementation of smart water meters, although currently uneven, can provide invaluable insights. A comprehensive plan for universal smart metering should be devised.

For future policy interventions by the next government, a data-led approach is crucial to comprehend their impact on behaviour. Datasets and analyses should always undergo independent peer review to instil confidence in all stakeholders regarding the robustness of the findings.

3.6 Step 6: Education, Education, Education

Compared to other environmental concerns, awareness of water scarcity is relatively low. The Great British Rain Paradox survey highlighted that 72% of the British public believes that the UK has sufficient water to meet daily demands. According to the study, only 10% of people consider water consumption as a critical environmental issue, ranking far below plastic pollution (39%), energy consumption (22%), and food waste (16%).

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Traditionally, water companies and their associated industry groups/NGOs have been the primary messengers regarding scarcity and the need for reducing domestic consumption. However, their credibility has been undermined by continuous reports of supply-pipe leakage and sewage pollution. Ofwat's customer research reveals a decline in public trust towards the water industry. Therefore, a new messenger and a robust national campaign are necessary.

The next government should **coordinate a significant national public information campaign to educate the public about water scarcity** in our country and the simple steps they can take to reduce their water consumption. Additionally, there should be motivation, whether through promotion or incentivization, to retrofit more water-efficient fittings in properties.



3.7 Step 7: Deliver higher minimum water pressure to every home

Contrary to intuition, increasing the minimum water pressure in households can actually help reduce domestic water consumption. When the water pressure is low, low-flow water fittings cannot perform optimally, leading to consumer frustration and prolonged showers that result in higher water and energy usage. To fully benefit from water- and energy-saving advancements in shower technology, such as boost functions, cold start, and recirculation, a pressure of 2-3 bar is required.

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In situations with poor mains or gravity pressure, high flow rate terminal fittings are necessary to ensure satisfactory shower performance. It's important to note that the legally required Guaranteed Service Standard (GSS) of 0.7 bar only applies to the curtilage of the property. If the shower is located on the first floor or higher, the pressure could be even lower than 0.7 bar.

The inadequate mains pressure in many areas is a direct result of underinvestment and aging infrastructure since privatization. Water companies may be hesitant to increase network pressure due to concerns about supply leakage. The next government should **collaborate with the water sector to establish a sufficient minimum pressure of ideally 3 bar** in all households, it would become more feasible to mandate the use of lower flow terminal fittings. Until then, any attempts to ban higher-flow fittings, as suggested by certain stakeholders, are unlikely to succeed.

4. Our Route to Net Zero



The path to decarbonisation in the bathroom industry is not a simple one, for two main reasons. First, the UK bathroom manufacturing sector is deeply intertwined with complex and well-established global value chains. This presents challenges in accurately measuring and reducing carbon emissions. Second, in certain product categories, especially showers, the majority of carbon emissions occur during the use phase, which is beyond the control of manufacturers. Therefore, we need assistance from policymakers in navigating our industry's journey towards a net zero future.

4.1 Simplifying sustainability reporting

The bathroom manufacturing industry faces unique challenges in its global value chains, particularly when it comes to sustainability reporting. These challenges are even more pronounced for small to medium-sized enterprises (SMEs) within the sector. Accurate carbon measurement and reporting rely on consistent and reliable data, which can be hindered by a lack of access to energy generation information in some overseas manufacturing bases.

To tackle these issues, it is crucial for the next government to provide comprehensive guidance and resources specifically tailored to sectors with complex supply chains. This will ensure accurate carbon measurement and reporting, taking into account the distinct challenges each sector encounters.

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Furthermore, there is a growing demand from corporate clients of bathroom manufacturers, including builders' merchants and major housebuilders, who require detailed insights into the sustainability credentials of their suppliers. While these demands are valid, the varied nature of inquiries and different reporting systems have created administrative burdens for suppliers, diverting attention from the primary goal of decarbonization.

To streamline this process, collaboration between the next government and the Competitions and Markets Authority is essential. The objective should be to **establish a framework that enables legal collaboration between competitors on environmental assessments for both suppliers and products**. By standardizing the process, the industry can focus its efforts on achieving genuine decarbonization.

4.2 Ramp up retrofit

Addressing emissions from showering and bathing, primarily caused by water heating, requires a significant transformation in the housing sector of the UK. The key lies in decarbonising hot water production in households, which necessitates extensive retrofitting activities in the country's housing stock.

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The Construction Leadership Council (CLC) has presented a comprehensive retrofit strategy, outlining a 20-year vision that aligns the construction industry's efforts with government initiatives to retrofit the existing 28 million homes in the UK. The strategy encompasses several core objectives, including:

- Aiming to elevate homes to Energy Performance Certificate (EPC) C standard by 2035.
- Cultivating a skilled workforce dedicated to retrofitting tasks.
- Pioneering innovative retrofit products and technologies.
- Ensuring that retrofitting solutions are affordable and accessible to homeowners.

To fully realize the strategy's potential and contribute to the 2050 net zero carbon emissions target, the CLC prioritizes the following recommendations:

- Establishment of a Retrofit Delivery Agency by the government for strategic implementation.
- Introduction of financial schemes by the government to alleviate retrofitting expenses for homeowners.
- Streamlining regulations to simplify retrofit procedures for homeowners.
- Encouraging the construction industry to innovate affordable and efficient retrofit products and technologies.
- Upskilling within the construction sector to meet the surging demand for retrofit services.
- Joint efforts by the government and industry to enhance public awareness of the benefits of retrofitting and the steps involved.

Although ambitious, the CLC's retrofit strategy is entirely feasible with collective efforts from the government, the industry, and homeowners. **The BMA firmly supports this strategy and strongly urges the next government to dedicate itself to its realization.**



4.3 Decarbonise the Grid

To achieve their decarbonisation objectives, bathroom manufacturers must prioritize making changes to the electricity grid. This transition is of utmost importance for two main reasons:

1.Scope 2 Emissions from UK Operations: Many members of the Bathroom Manufacturers Association (BMA) have already taken proactive steps by sourcing their energy from providers committed to 100% renewable generation. However, decarbonising the grid ensures that these efforts are universally impactful, extending beyond companies that have made environmentally conscious energy choices.

2.Electrification of Hot Water Heating: As part of the bathroom industry's journey towards achieving net zero emissions, there is a strong focus on minimizing emissions during the use phase. A crucial component of this strategy involves the electrification of hot water systems and the wider adoption of electric showers. However, for this approach to effectively reduce carbon footprints, it is vital that the electricity used to power these devices is generated from low-carbon sources.

In line with these objectives, the BMA fully supports and encourages the next government to **pursue all initiatives aimed at decarbonising the grid**. By ensuring that the grid is supplied with a sustainable blend of low-carbon energy sources, we not only secure a greener future for bathroom manufacturers but also lay the foundation for sustainable infrastructure across the entire country.



5. Public Washroom Provision

The availability of public washrooms is steadily declining in England. Despite the evident need for such facilities, this decline has largely gone unnoticed, with no proactive national policies addressing the situation. Between 2010 and 2013, local authorities closed down one in seven public toilets. The gravity of the situation was further highlighted in subsequent BBC reports: By 2018, 37 areas in England and Wales lacked any council-operated public conveniences, a significant increase from just two years prior.

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However, public toilets serve a greater purpose than mere convenience. Their scarcity disproportionately affects women, outdoor laborers, individuals with health conditions or disabilities, the elderly, and the homeless. This deficiency often results in long queues for women's facilities in high-traffic areas. To support equal access, the British Toilet Association has advocated for an equal number of female cubicles as the combined total of cubicles and urinals in male restrooms.

The impact extends beyond inconvenience. Individuals with health conditions, children, and seniors often require more frequent access to restrooms. Alarmingly, a 2018 report from the Royal Society for Public Health indicated that 56% of the general public intentionally reduce their water intake to minimize restroom use while outside. Such practices can be detrimental to health, exacerbating existing concerns.

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The lack of public restrooms restricts daily activities within local communities. From parents in need of changing facilities to joggers and couriers, the current situation is incompatible with modern living standards.

A 2022 survey conducted by the Bathroom Manufacturers Association, which surveyed 2,000 individuals, shed light on the dissatisfaction with current provisions. The results revealed that 58% felt their areas lacked adequate public toilets, and 43% felt that facilities for disabled persons were insufficient. To address this growing issue, we propose the following measures:

- 1.Comprehensive Review of Public Conveniences:** Initiate an independent assessment of public restroom facilities in various English communities, such as town centers, coastal towns, and rural areas. The objective would be to understand the needs, evaluate the existing infrastructure, and identify any discrepancies.
- 2.Local Public Convenience Plans:** Mandate all tier 2 councils to formulate and implement local strategies regarding public restrooms. This approach harmoniously combines local decision-making with a holistic view of washroom availability, ensuring that different stakeholders currently providing these amenities can coordinate their efforts effectively.
- 3.Business Rate Relief Scheme:** Encourage businesses to offer their restroom facilities to the general public, even if they are not patrons, by providing them with rate relief. Establishments participating in this initiative should prominently display a universally recognisable emblem and must adhere to specific hygiene and accessibility standards.



6. Trade & Tradespeople

6.1 Export Promotion

The BMA has always been at the forefront of championing the global aspirations of its members, especially those with strong ties to the UK in their value chains. Our primary focus has been to amplify their international trade presence, with a specific emphasis on the expansive US market. The bathroom market in the United States is immense, being 60 times larger than the UK market in terms of value, and it has shown a remarkable appetite for British products.

“Our industry, regrettably, does not qualify as a 'priority'”

Unfortunately, despite our tireless efforts, we find ourselves navigating these international waters without any support from the Department for Business and Trade (DBT). Our industry, regrettably, does not qualify as a 'priority'. This raises an important question: How many small yet promising sectors are missing out on incredible growth opportunities due to the lack of institutional support?

Our counterparts across the English Channel, particularly our German association, provide a striking contrast. They receive a substantial 40% funding for their pavilion at the KBIS exhibition in the US. This generous support ensures that they have a significant presence at the show, effectively showcasing their capabilities. In contrast, due to the absence of support, our presence at these events remains modest, failing to tap into the vast potential that the US market offers.

The allocation of resources by the DBT is equally perplexing. On one hand, they allocate substantial resources to negotiate new trade deals, which upon closer examination, seem to offer minimal returns. For example, an astonishing £46 million was invested in trade discussions with Australia and New Zealand last year. On the other hand, crucial initiatives that could directly benefit sectors like ours are overlooked. The £120k monthly expenditure on a scarcely utilised helpline with a mere 7% utilisation rate or significant investments in trade missions to events like the New York Pride, while commendable, underscore a misalignment in priorities.

“A shift in strategy is long overdue”

A shift in strategy is long overdue. The government's approach of favouring specific sectors for international trade support is short-sighted. It is time to level the playing field. The next government should **adopt a system where all industries can access resources to enhancing overseas market access for UK companies**, provided they have access to sector-specific trade advice backed by a reputable trade body. Only by doing so can we truly harness the immense potential of the global marketplace, ensuring that no sector is left behind in the pursuit of economic prosperity.



6.2 Availability of Tradespeople

The bathroom manufacturing sector faces a growing challenge: an acute shortage of skilled plumbers and bathroom installers. This shortage, exacerbated by an aging workforce, threatens not only the future expansion of the market but also the consumer's ability to execute renovation projects efficiently. Every area of the industry stands to experience increased lead times and potential reputational harm unless swift measures are taken.

The industry's shortfall in proactively cultivating fresh talent is evident. In the academic year 2021/22, the British Institute for KBB Installation (BIKBBI) engaged with thousands of students across UK schools and colleges. As a result of these outreach efforts, over 350 students showcased a keen interest in apprenticing as fitted furniture installers. Yet, the industry faltered in opening up these 350 apprenticeship slots. Consequently, these motivated young aspirants charted their career paths in different sectors. The loss of those potential new installers translates to a loss of 15,000 installation projects annually.

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Training and apprenticeship programs are in place, as is the funding for training. Together, industry groups like BMA, BIKBBI and CIPHE are working to make the industry attractive to new entrants. However, the structure of the installation and plumbing trades is a problem: many thousands of microbusinesses that lack the capacity and motivation to recruit apprentices and trainees. There must be a concerted effort to boost recruitment and ensure retention, but there is not structure of the market prevents this from happening. The next government should **establish a task force to identify and propose policies to address barriers to apprenticeship recruitment in fragmented sectors.**



7. Health & Wellbeing

7.1 Retain NHS Guidance on TMVs

In the healthcare environment, where patient safety is of utmost importance, it is crucial to establish and adhere to robust guidelines. One such significant guideline is HTM 04-01, specifically developed to provide guidance to NHS Trusts on water fittings. This guideline was created in response to the tragic and avoidable incidents of patient scalding, which were unfortunately all too frequent and categorized as "never events".

The cornerstone of HTM 04-01's success in preventing these tragedies lies in the implementation of Thermostatic Mixing Valves (TMVs). These valves are designed to effectively control water temperature during washing and bathing, thereby mitigating the risk of scalding. By emphasizing the use of TMVs, HTM 04-01 has significantly reduced the potential harm to patients from water-related accidents.

“ HTM 04-01 has significantly reduced the potential harm to patients from water-related accidents ”



However, as with any guideline, there are critics. Some detractors argue that TMVs require maintenance, which may introduce infection risks if neglected. It is important to acknowledge this potential risk, but it is outweighed by the overall benefits of TMVs. HTM 04-01 incorporates stringent maintenance protocols to minimize such risks.

In addition to the critical role of TMVs, HTM 04-01 provides a comprehensive framework that addresses the broader issue of pathogens in healthcare settings. It offers detailed protocols for water system design, disinfection, monitoring, and risk assessment, ensuring that healthcare providers are adequately equipped to prevent potential waterborne hazards. Given its undeniable success and importance in healthcare settings, it is imperative that the next government recognises the significance of this guidance and ensures its continuation, always prioritizing patient safety.

7.2 Pathogen awareness

The COVID-19 pandemic has highlighted the critical importance of public health and the need for awareness and understanding of pathogens. While the world has been primarily focused on COVID-19, there are other silent disease-causing pathogens lurking, even in unexpected places like the bathroom. It is imperative for the next government to prioritize public awareness campaigns to educate and inform individuals about these health risks.

One often underestimated health concern is the phenomenon known as toilet plume. When a toilet is flushed, it creates turbulence that releases a fine mist of droplets, commonly referred to as "toilet plume." Recent studies have shown that these tiny droplets can carry harmful microbes, capable of settling on surfaces and remaining suspended in the air for extended periods. This poses a significant risk of disease transmission, including not only COVID-19 but also serious infections like staphylococcus and E. coli. Fortunately, a simple step of closing the toilet lid before flushing can substantially reduce the spread of these pathogens.

“ One often underestimated health concern is the phenomenon known as toilet plume ”

Another pressing issue is Legionnaires' disease, caused by the Legionella bacteria. This form of pneumonia can be fatal, and it is contracted by inhaling water droplets contaminated with the bacteria. Alarmingly, the symptoms of Legionnaires' disease closely resemble those of COVID-19, making it crucial to differentiate between the two. Data from Public Health England has revealed a consistent increase in Legionnaires' cases from 2015 to 2018, with a staggering rise of 68%. While the numbers declined in 2019 and during the pandemic years of 2020-2021, the disease remains a persistent public health threat, particularly as we strive to return to normalcy.

To prevent outbreaks of Legionnaires' disease, rigorous maintenance of water systems is essential. Homeowners, landlords, and those responsible for public buildings must be well-informed about mitigating the risk of Legionella and other water-borne contaminants. Best practices include eliminating dead legs or dead ends in pipework, regularly flushing rarely used outlets like showerheads and taps, and maintaining proper cleaning and de-scaling of showerheads and hoses.

In conclusion, pathogen awareness goes beyond mere knowledge of the risks; it is about understanding how simple actions can effectively prevent the spread of these diseases. By **implementing dedicated public information campaigns**, the next government can ensure that individuals are well-informed and empowered to take actions that safeguard their health and the well-being of their communities.

7.3 Adequate adaptations



“for these adaptations to be truly impactful, they must be implemented promptly”

The United Kingdom faces two intertwined challenges: an increasingly aging population and a significant shortage of care staff. Recent data reveals that the percentage of individuals over 65 has risen from 16.4% to 18.6% over the past two censuses. Moreover, as of June 2023, there are a staggering 125,572 vacancies in secondary care across England. To tackle these challenges, innovative solutions are essential, and one of the most effective and dignified approaches lies in promoting the concept of 'aging in place'.

Aging in place is more than just an abstract idea; it is a tangible strategy that involves making thoughtful and efficient adaptations to living environments, particularly bathrooms. For example, integrating level access showers and toilets equipped with washing and drying capabilities can have a transformative impact. These features not only foster independence but also provide the elderly with a renewed sense of self-reliance and dignity.

However, for these adaptations to be truly impactful, they must be implemented promptly. Early interventions can help mitigate potential challenges, ensuring that individual needs are addressed before they worsen. Furthermore, while functionality is crucial, aesthetics should not be overlooked. After all, these modifications are integral parts of personal spaces and, if aesthetically pleasing, they are more likely to withstand the test of time and benefit future residents.

Despite mechanisms like the Disabled Facilities Grant (DFG), which has an annual budget of over £500 million, these vital housing adaptations are still underutilized. A significant contributing factor to this underutilization is the evident lack of Occupational Therapists and overall organizational capacity within local authorities. As a result, many individuals face prolonged waits, which are often unacceptably lengthy given their urgent needs.

In light of these challenges and the inherent benefits of housing adaptations, it is imperative for the next government to take decisive action. **A comprehensive review of housing adaptations is crucial**, but it should go beyond that. There needs to be **a dedicated strategy aimed at optimising living environments**, enabling individuals to age comfortably in place. This strategy should not only address the timely and aesthetically pleasing incorporation of adaptations but also ensure a streamlined and efficient utilization of resources, such as the DFG. Only with a clear, actionable plan can the United Kingdom truly meet the needs of its aging population while simultaneously alleviating the strain on its care system.

8. Conclusion

Throughout this document, we have explored the intricate world of the bathroom industry, shedding light on its often-underestimated role in the daily lives, health, and wellbeing of the British population. From the imperative of raising industry standards to the compelling journey towards decarbonisation, we have emphasized the critical nature of our sector not only in economic terms but also in promoting public health. The priorities we have outlined for the next government underscore the untapped potential within our industry, waiting to be harnessed.

For the next government, the path ahead is clear. By acknowledging and addressing the priorities we have set out, there is a promising opportunity to enhance the lives of the British public, further the growth of this vital industry, and pave the way for a safer, healthier, and more prosperous nation.

The Bathroom Manufacturers Association (BMA) remains committed to collaborating, advising, and working hand-in-hand with policymakers to bring this vision to life. The future beckons, and with the right decisions, our industry can truly make an unparalleled difference in the UK.



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