The Code for Construction Product Information

CPA CCPI [Trade Associations] - Questionnaire

Q25 Are there any other comments you would like to make at this stage with regard to the Code, its implementation, its policing or its enforcement?

The Institution of Engineering and Technology welcomes the opportunity to contribute to this consultation. We are a charitable engineering institution with over 167,000 members in 150 countries – working to engineer a better world. Our mission is to inspire, inform and influence the global engineering community to advance technology and innovation for the benefit of society.

In preparation we have consulted widely with members and hosted an open call via our Plain Language Guide project.

We support the *principle* of improvement of product information dissemination within the industry. We also agree that a code of conduct which helps manufacturers, and their marketing teams communicate with integrity is a useful and necessary tool.

However, we cannot support the Code for Construction Product Information (CCPI) in its current form due to the lack of clarity. We also believe the Code does not demonstrate how it forms part of an integrated solution which shows a mix of regulation, competence, integrity and information management.

Issues

Mandatory by Default

The proposed Code, whilst voluntary at present, is in effect, mandatory because the Marketing Integrity Group confirms that if not adopted by industry, 'government will move to legislate'. A mandatory code of conduct is likely to prove confusing in the context of the emerging Construction Product Regulator and has the potential to distract from the mandatory requirements that Government will shortly introduce.

Clarity of Purpose

The Code has a concerning lack of clarity about how it aligns with both the current regulatory landscape, and with the emerging roles of Building Safety Regulator and Construction Product Regulator.

This vagueness creates a risk of

- Wasted Resource – by implying that the Code is mandatory and distracting from the requirements of complying with existing and emerging regulations
- Compliance Confusion – declaration of adherence to the Code could mislead specifiers that companies with the CCPI badge are complying with regulations

- Regulatory Loopholes - For example, Clauses 4-7 on 'Core Information' are only a partial overlay onto the existing remit of the Construction Product Regulation, the Low Voltage Declaration and current industry recognised quality audit processes and therefore create confusion and potential loopholes.

Lack of Consistent and Impartial Advice

Many manufacturers we have talked to, whilst keen to engage with the Code are confused about the lack of information on *how* to implement it in their organisations.

This lack of independent advice has already created a vacuum which is being filled by third party commercial providers who may or may not be appropriate or necessary for manufacturers to use. This confusion is not helped by mention of these providers as possible solutions during presentations of the Code. This questions the independence of the Marketing Integrity Group.

For manufacturers, this is reminiscent of the BIM mandate of 2014-16 which saw many of them invest heavily in technologies which ultimately were unnecessary and brought no return on investment. This vacuum is particularly dangerous for SMEs who may feel they have to invest in technology when there may be other solutions available to them.

In this context, manufacturers will waste resource trying to second guess how to comply. Third parties will seek to profit from this confusion. We already know that manufacturers are being approached by such companies saying they will 'help you comply with CCPI'.

The Code will not Solve the Problem of Product Information

The consultation document introduction states that information should be clear, accurate, up to date, accessible and unambiguous – the 5 'acid tests'. However, the way the Code itself has been presented is not clear or unambiguous.

The solution to the problem defined by Hackitt will be a mixture of regulation, competence, integrity and information management. Whilst a declaration of integrity is to be welcomed, the other elements must not be ignored or interfered with.

Our Recommendations

Make it Voluntary

We recommend that rather than pursuing a mandate (via legislation), the Marketing Integrity Group moves to make the Code a voluntary declaration of loyalty to the five acid tests for construction product information. To a great extent the tone of much of its presentation takes that route. The MIG needs to be clear about this voluntary status for the Code, whilst providing greater detail about how manufacturers can comply.

Let the Regulator Regulate

The Code needs to draw the distinction between 'facts' – core information such as third-party certification and Essential Characteristics – and 'marketing messages' – descriptions about products and Non-Essential Characteristics, which are by their nature more general. Facts require market surveillance and regulation; by making the distinction between facts and marketing messages, the MIG can avoid clashing with existing regulations and the Construction Product Regulator and focus on achieving the five steps within marketing messages themselves.

Be Rigorously Independent of Commercial Interests

To be successful the Code needs to be independent and needs to be seen to be independent. The Marketing Integrity Group should make a statement about this independence and refrain from recommending or being seen to recommend commercial third party solutions of any kind in any presentations about the Code.

The move by the Marketing Integrity Group to create a 'Supporters' category is a potential threat to the perceived objectivity of the Code and should be discontinued.

Explain How to Comply

We believe that the Marketing Integrity Group should align the Code more clearly with the requirements of Building A Safer Future and urge manufacturers to digitise their construction product information. They can then make their own commercial decisions about which, *if any*, technology providers they may need to use, from an informed position of need.

A Digital Golden Thread

The new Regulators will require the Golden Thread, an accurate and up to date record of the building data, to be digitally traceable. This means that information about products will have to be digitised and manufacturers will have a legal requirement to comply. Users of product information will also seek information in digital format, as early as Gateway 1. If manufacturers do not digitise their product information, they will not be compliant with the regulations.

The Marketing Integrity Group should make a commitment to digitise a requirement of the Code for Construction Product Information.

Our Plain Language Guide to Manufacturers aims to support and educate manufacturers (in particular SMEs) to digitise their product information cost effectively, so they can improve how they share it, which has a direct impact on 'better data, safer building'.

Conclusion

We urge the Marketing Integrity Group to:

1. Choose the Declaration of Loyalty model for the Code.
2. Align the Code more closely to both existing regulatory and audit processes and the emerging Regulators.
3. Be rigorously independent of commercial interests.
4. Adopt a clearer set of instructions for manufacturers about how to comply.
5. Make a commitment to digitisation a requirement to comply with the Code.
6. Remain impartial in their development of this guidance by filling the vacuum with simple advice on digitisation and information management.

We continue to support the principle of a voluntary Code for Construction Product Information and look forward to working with the Marketing Integrity Group to help this happen.

We have confirmed to the MIG chair and vice chair our willingness to assist in improving the code along these lines, so that manufacturers do not make the same poor investment decisions of the past and can sign up to the Code with informed confidence.

Rick Hartwig

Built Environment Lead

T: +44 (0) 1438 767631
M: +44 (0) 7872 463313

Visit our website www.theiet.org
Follow us on [Facebook,](Facebook) [Twitter,](Twitter) Engineering Communities and LinkedIn
Michael Faraday House, Six Hills Way, Stevenage, SG1 2AY, United Kingdom

Links to further information:

- Introducing The Plain Language Guide For Manufacturers
  http://bit.ly/ManufacturersPLG_intro
- Why is Product Data Important to Manufacturers?
  http://bit.ly/ManufacturersPLG_1
- Standards and Construction Product Data Must be Connected
  http://bit.ly/ManufacturersPLG_2
- Comparing Construction Products: Dispelling the Myths
  http://bit.ly/ManufacturersPLG_3
- Manufacturers Should Host Their Own Product Data
  http://bit.ly/ManufacturersPLG_4
- The Future of Construction is not 3D BIM Objects
  http://bit.ly/ManufacturersPLG_5
- Essential First Steps to Gathering, Coordinating and Organising Manufacturers' Product Data
  http://bit.ly/ManufacturersPLG_6
- Avoiding Failure: Product Data post Grenfell
  http://bit.ly/ManufacturersPLG_7
- Discussion on the Code for Construction Product Information
  https://bit.ly/ManufacturersPLG_9