

UKSFA Flooring - Legislation Risk Register - Includes government consultations

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Legislation & Policy		Risk Level	Status & Timeline	Stakeholders & Impact	Economic Impact	Social Impact	Environmental Impact	Mitigation			
In force now	Building Safety Act (2022)		Current	Primarily applies to higher risk buildings over 18m tall or seven or more floors. The Act's focus is on overall building safety, accountability, and remediation	Increased costs for certification, testing, and compliance documentation	Enhanced occupant safety from compliant flooring materials contributing to fire resistance and slip safety	Encourages selection of sustainable, low-emission, and durable flooring products in line with ongoing safety renovations	Proactively certify products with required UK safety standards.	Provide training for installers on compliant installation techniques	Support use of EPDs and environmentally responsible products	Integrate sustainable flooring solutions within remediation and new builds
	CEN JTC24		Under development; guidelines coming late 2025+	Development of deliverables for Digital Product Passports - Manufacturers, importers, clients: Data requirements for DPP and traceability.	Investment in IT/data handling and compliance with DPP standards.	Improves product information accessibility and stakeholder confidence.	Supports circularity; enables informed end-of-life management.	Prepare to digitize product environmental data (e.g., carbon footprint, material composition, recycling instructions)	Caution - Prepare to invest in IT solutions for traceability and DPP compliance when full DPP requirements are understood.	Participate in consultation or pilot projects as available to influence and understand upcoming data requirements	
	Ecodesign for Sustainable Product Regulation (ESPR), 2024/1781		Proposed, carpets expected 2026–2029	Manufacturers and suppliers: Will require carpets/flooring to meet EcoDesign and sustainability thresholds. EPD, LCA, DPP will become mandatory and managed through the EU CPR. UK Likely to adopt EU legislation	Innovation spend, redesign costs, compliance for durability and recyclability.	Informs consumer choice; can boost health/safety aspects via lower emissions or toxicity.	Ensures lower environmental impacts in material production and disposal.	Audit current flooring and carpet ranges for durability, recyclability, and toxic chemical content.	Research and invest in product redesign, material substitution, and eco-innovation to meet expected EcoDesign thresholds	Proactively engage with industry working groups and supply chain, including waste management to influence technical standards	
	Emissions Trading Scheme (ETS)		From January 1, 2028	Energy-from-waste operations will need to purchase carbon allowances under ETS, increasing disposal costs for flooring and other construction waste	Significant upward pressure on costs for landfill/incineration; businesses must innovate to cut overall expenses.	Strong incentive to avoid disposal and improve recycling rates for flooring.	May shift culture in flooring supply and installation, favoring low-carbon and circular products.	Model company exposure to future carbon costs associated with waste disposal	Plan to reduce waste, increase recycling and reduce reliance on incineration of flooring	Partner with recyclers and technology providers to support development of low-carbon disposal alternatives	
Proposed or due to be implemented	Empowering Consumers Directive (EmpCo Directive) known as Directive (EU) 2024/826		In force 26 Mar 2024 Must be adopted by EU states by 27Mar2026	Manufacturers, retailers, consumers etc. Key objectives to combat greenwashing, enhance transparency and empower consumers	Compliance costs (documenting claims, updating labels), potential competitive advantage for credible sustainable flooring. Risk of fines for violation	Improves consumer trust, supports better purchasing decisions, deters greenwashing and mislabeling	Raises product standards for durability, reparability, and circularity; supports EU circular economy goal	Establish internal governance for substantiating environmental, social, and circularity claims with measurable, independently verified data. Review marketing, labels, and communication for compliance	Ban unsubstantiated terms like "eco-friendly," "green," "climate neutral" unless verified with robust evidence and third-party certifications	Train staff on new requirements, update product information for EU sales	Publish transparent warranty/durability info, address early obsolescence, and offer repair support. Emphasize design for durability, modular repair, and use of certified recycling labels
	EU Circular Economy Act 2026 (CEP)		Proposed, target 2026	Manufacturers and supply chain: Will drive higher resource efficiency, product reuse, and circularity requirements.	Product redesign, new certifications; investment in take-back and recycling infrastructure.	Greater transparency for product lifespan and end-of-life options.	Major enhancement for reuse and recycling in flooring products.	Redesign products for modularity, reuse, and high recyclability	Explore take-back, refurbishment, and recycling schemes for end-of-life flooring	Seek early certification and labeling for circularity to maintain market access and brand leadership	
	EU Construction Product Regulation 2024/3310		In force Jan 2026 and implemented from 2026-2032	Manufacturers - CPR will make data disclosure mandatory. Declarations of Performance/Conformity are mandatory for CE Marking under CPR	Higher compliance costs but lower trade barriers across the EU. Incentives for innovation, sustainability, and market access. Potential for improved competitiveness for compliant and sustainable products	Greater consumer protection and transparency. Clearer information for buyers and specifiers. Enhanced indoor health and safety for building occupants through product testing and life-cycle data	Focus on lower embodied carbon, mandatory reporting on environmental effects, and life-cycle impacts. Promotion of recyclable, non-toxic, and low-emission flooring products. Stronger regulation on hazardous substances (REACH)	Begin reviewing and updating all technical files, declarations, and documentation now	Learn about digital product passports and robust traceability systems. Stay aware of EU updates on DPP criteria. Research and implement sustainability data collection and reporting	Train staff and supply chain partners on new compliance requirements	Engage with industry initiatives and standard-setting bodies early
	EU EcoModulation Delegated Act		Expected to come into force around late 2027 or early 2028	Allows for application of ecomodulated fees on EPR. Likely starting with textiles and furniture, and may expand to construction/flooring materials as the EU reviews sustainability criteria	Manufacturers will pay EPR fees that reflect the environmental performance of their products—lower-impact designs will incur reduced fees, while products with higher impact (e.g., harder to recycle, greater emissions, more toxic chemicals) will face higher rates	Strong incentive for circularity, drives low-impact design	Favours innovation, repair, and maintenance sectors, while potentially boosting jobs linked to recycling and sustainable product management.	Track and model EPR fee structures; prioritize product lines likely to face lower fees (e.g., easily recyclable, non-toxic materials)	Engage with relevant industry bodies on methodology for product scoring	Train design and procurement teams to factor in future EPR costs when developing new lines	
	EU Energy Performance Buildings Directive		Recast EPBD (EU/2024/1275) entered into force 28 May 2024; EU Member States must transpose into national laws by 29 May 2026	UK manufacturers are not directly regulated, but EU clients, specifiers and developers must comply, affecting product selection	Risk of reduced competitiveness for UK flooring products lacking compliant data when exporting to EU	EU-driven standards increasingly shape pan-European professional expectations	Directive targets full decarbonisation of EU buildings stock by 2050	Treat EPBD as de facto market standard for EU-facing products; align product documentation and sustainability messaging	Develop net-zero ready product ranges; provide indoor air quality (VOC), thermal performance and durability data	Align product data across EPD, CSRD, CPR and sustainability claims	Produce EN 15804 EPDs; integrate LCA into product design and R&D
	EU Green Claims Directive		Stalled	It would require businesses to have independent assessment and certification for any green claims made in commercial communications or labeling. If enacted, these rules would make compliance for green claims more robust, introduce significant penalties for violations, and apply to both EU and non-EU companies marketing in the EU	Increased compliance costs, potential heavy fines and exclusion from public procurement, risking both direct and reputational damage	Consumers gain greater trust in environmental information, improving confidence in sustainable products and rewarding responsible brands	Demand shift towards products with substantiated, lower life cycle impacts and reduce risk of greenwashing	Conduct comprehensive internal audits of all marketing, labelling, and claims to ensure compliance with the directive	Invest in third-party certification, robust data management, and life cycle assessment tools to provide scientific substantiation for claims	Update staff training and communication protocols to ensure only evidence-based, approved green claims are used	Withdraw or amend any claims or labels not meeting the new standards before enforcement deadlines to avoid sanctions
	EU Waste Framework Directive (WFD)		Updated Oct2025 to include EPR on textiles and footwear. Next review due 2029	Not flooring yet - By 2028, producers placing textiles and footwear on the EU market (including online and non-EU suppliers) must finance the collection, sorting, re-use, and recycling of these products. Mandates tight controls on collection/exports and requires robust data collection / reporting	Ongoing compliance costs and obligations for waste minimization, reporting of recycling rates. While textile flooring is not directly covered, these reforms set the precedent and regulatory mechanism for rapid inclusion if prioritized under future amendments.	Continues to underpin recycling and waste reduction strategies industry-wide.	Core driver of circular economy, mandates waste reduction and recovery targets.	Track developments, especially precedent-setting standards for textiles and footwear	Prepare for rapid inclusion by mapping supply chains, collecting recycling/disposal data, and setting up separate collection streams for flooring aligned to likely future requirements.		
	Extended Producer Responsibility for Packaging (eEPR)		Current, expanding from 2025. Immediate compliance required	Manufacturers, importers, retailers businesses over €1million turnover: Accountability for packaging waste and recovery.	Increased reporting, recycling, and compliance costs	Shifts responsibility for waste reduction, could support job creation in waste/recycling.	Drives reduction of packaging waste and increases recycled content use, possibly more circular design.	Set up reporting systems to track packaging use, collection, and recycling data across the business.	Design packaging for high recyclability and minimal environmental impact, replacing problematic materials with alternatives where feasible.	Collaborate with supply chain partners to share best practices and co-invest in recycling/collection infrastructure.	Budget for future compliance costs and engage with EPR scheme administrators to stay ahead of reporting requirements
	Future Homes Standard		No current guidance on when it will become law. 2026 or beyond	Policy committing to reduce CO ₂ emissions in new homes by 75–80% from 2025 onwards. Improved building fabric efficiency with higher insulation levels and better airtightness, including floors, walls, and roofs to minimize heat loss	Opportunity to innovate with sustainable, energy-efficient flooring materials and solutions. Flooring suppliers need to adjust product ranges to meet stricter thermal and airtightness requirements?	Increased consumer awareness and demand for sustainable homes may shift flooring preferences	Reduction in the carbon footprint of flooring products through higher efficiency requirements. Potential rise in demand for sustainable, recyclable, and low-VOC flooring options.	Invest early in R&D for compliant flooring products	Develop cost-effective, high-performance flooring solutions	Incorporate Environmental Product Declarations (EPDs) into product development.	Train workforce on new installation standards

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Growing the market for low carbon industrial products: policy framework		Consultation closed 29th September 2025	Initially will be focussed on steel, cement and concrete sectors - but direction of travel for low carbon policy framework for other products in future						
PFAS Plan: building a safer future together - GOV.UK		Plan updated 3 Feb 2026; delivery staged over several years with actions signposted across pillars	Government expanding evidence on PFAS in waste streams; reviewing destruction/disposal options; continued POPs controls. Sewage-sludge consultation planned 2026	Public sector procurement and retailers increasingly screen for PFAS; "PFAS free" performance floors create differentiation while avoiding legacy liability associated with PFAS containing floor care products	Phasing out PFAS in surfaces and aftercare cuts potential worker exposure for installers and facilities staff	Phasing out PFAS in surfaces and aftercare cuts downstream wastewater load	Audit all raw materials (resins, coatings, surface treatments, additives, adhesives, sealers) and any maintenance products	Monitor the PFAS Plan update stream and Defra/HSE bulletins for 2026-2028 milestones; align with any cross sector PFAS guidance issued for regulators and operators	Review site permits and effluent/air emission points for potential PFAS pathways (cleaning baths, coating lines, wash-down, scrubbers, wastewaters); implement source segregation
The Procurement Act 2023		In force: 24 Feb 2025 Will be influencing product choice now	Public procurement - This Act expects local authorities to consider environmental benefits in addition to financial cost when awarding contracts	Suppliers may face costs to demonstrate environmental credentials; wider opportunities for SMEs and sustainable products.	Fairer access, improved transparency, drive toward green public spending.	Promotes environmental consideration in procurement, incentivizing greener flooring solutions.	Achieve recognized certifications (such as ISO 14001, EPDs) to evidence environmental claims in tender documents	Develop clear documentation of sustainable sourcing, emission reductions, and supply chain initiatives for use in procurement submissions	Monitor procurement policy updates and train sales/contract teams in compliant tender responses
UK Construction Product Regulation		Will come into effect 8 Jan 2026	Non-compliance with the CPR could result in investigations, product recalls and fines. Products can continue to comply with CE marking for the time being.	Increased compliance and documentation cost for manufacturers and installers. Market access and competitiveness may improve for compliant, high quality sustainable flooring products. New govt and public sector building projects require compliance	Better protection for building occupants, greater transparency and product information, stronger incentive for upskilling installation practices	Incenitvises low-carbon, recyclable, and low emission flooring products and innovations. Required reporting on embodied carbon and life cycle impacts - drives greener choices. Phases out high impact products	Invest in EPDs and LCAs.	Prioritise sourcing of verified low impact, recyclable materials. Train staff and supply chain	Research eco design and upgrade of products
UK FPR/Defra Circular Economy Task Force-Priorities		Under consideration; 6 priority areas. Consultation due winter 2025/26	1)Plastics & chemical,2) Transport and Tyres 3)Textiles 4)Batteries and WEEE, 5)Agri/food 6) Built Environment (Buildings & furniture) Manufacturers, importers, supply chain - Flooring considered within Built Environment (Buildings & Furniture) priority	Potential compliance, reporting, and recycling investment.	Anticipates eco-responsibility expansion, may affect jobs/reputation.	Further boost to circular economy and waste minimization linked to construction sector.	Participate in policy consultations to shape upcoming requirements	Conduct early reviews and pilots of reporting, take-back, data systems, collection and reporting and recycling processes for flooring	Communicate expected changes to customers and suppliers to build support for circular solutions
UK Green Claims Code		Current- Competition & Markets Authority 2021	UK Green Claims Code Checklist. Environmental claims must be truthful, evidence-based, and substantiated, with significant penalties for non-compliance ranging up to 10% of global turnover for serious offences	Increased reporting, recycling, and compliance costs	Shifts responsibility for waste reduction, could support job creation in waste/recycling.	Drives reduction of packaging waste and increases recycled content use, possibly more circular design.	Develop internal governance and training to ensure all marketing, packaging, and specification language uses only verifiable, up-to-date environmental data	Conduct regular third-party audits and product life cycle assessments (LCAs)	Require each green claim (label, advertisement, technical sheet) to be cross-checked against the CMA's 6-point checklist and supported by documentary evidence before publication
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