

# BMF RESPONDS TO MANDATORY WATER LABEL

**THERE** is no compelling case to legislate for a mandatory water efficiency label covering the products that BMF members distribute - because the established industry-led Unified Water Label already does the job. That was the message from the Builders Merchants Federation (BMF) to ministers in a consultation that closed just before Christmas.

In its formal response to the Department for Environment, Food and Rural Affairs, the BMF questioned why DEFRA believes it is necessary to make new regulations for mandatory labelling when the Unified Water Label already exists - and is a workable and more cost-effective scheme than the DEFRA proposals.

The BMF also questioned why it is felt necessary to spend £££ millions of taxpayers' funds to invent a new scheme, from scratch, to replicate or take-over the established industry-wide Unified Water Label. Ministers ought to instead embrace the UWL as a way to comply with any new mandatory labelling - rather than legislating for new, unnecessary arrangements.

DEFRA sought views on passing new regulations to introduce a mandatory water efficiency label to inform residential & business consumers and encourage them to buy more water-efficient products. The proposals are intended to be a new UK-wide obligation - and could resemble the familiar energy efficiency label that shows energy ratings in coloured bands.

Responding to the likely extent of such an obligation, any new display requirements must be consistent and apply to all purchasing methods - namely in-branch and via online, remote & distance selling - the BMF emphasised. As buyers use various methods in pre-purchase research, any label display requirement must be consistent and apply equally to all traders - and not just merchants with in-branch displays or dedicated showrooms, the BMF said.

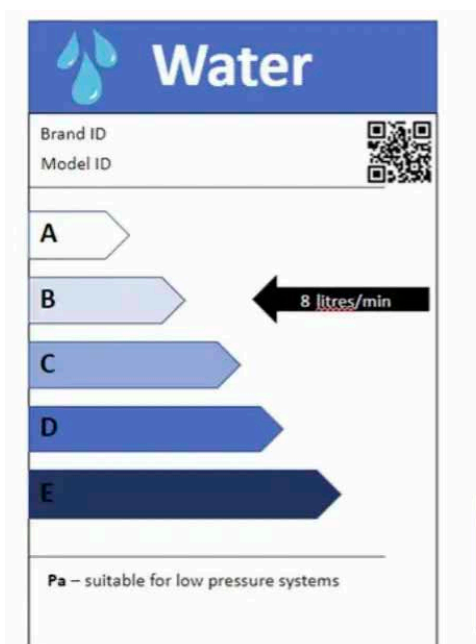
In addition, DEFRA was cautioned against using the term "efficiency" because the BMF and others firmly believe it is both unwise and misleading. The consultation wrongly implies water efficiency when (in fact) it only indicates water use. Buyers will be misled as their choices take no account

of low or high water pressure that has a bearing on actual use at home.

On enforcement, the BMF wants a pragmatic, risk-based approach - especially where it is obvious it was simple human error, rather than wilful intent to defraud. More effort is needed to revise the proposals (before any regulations are drafted) to compile a sliding scale of possible offences and the consequences of such breaches. And there must be a consistent approach throughout all 4 home nations - with only one organisation given UK-wide responsibility for policing any such labelling scheme - the BMF said.

On timing, the BMF understands such regulations are likely to come later this year, with a 15-18 months' implementation period, meaning an estimated start in early 2025. We are grateful to colleagues at the Bathroom Manufacturers Association for their help.

**The original 26-page consultation is at: [https://consult.defra.gov.uk/water-efficiency-labelling/water\[1\]efficiency-labelling/](https://consult.defra.gov.uk/water-efficiency-labelling/water[1]efficiency-labelling/)**



A mock-up of what one of the water-efficiency labels would look like  
Nestor-Sherman, William (DEFRA)

