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# Adhesive tapes and films with packaging or non-packaging applications under the PPWR

## Background and scope

The Packaging and Packaging Waste Regulation (PPWR) sets requirements for packaging products, including recyclability and the incorporation of recycled content recovered from post-consumer waste.

Under the PPWR, it is ultimately the responsibility of the manufacturer of the packaged product to ensure packaging is compliant with PPWR requirements. Suppliers of packaging material must provide manufacturers with necessary information to ensure compliance.

This document, a common position of the European adhesive tape and film industry grouped under Afera, aims to clarify the status of adhesive tapes and films within the PPWR for our entire supply chain, including for users of adhesive tapes.

Afera is the European Adhesive Tape Association, counting 120 members in 20 countries covering the complete value chain of the adhesive tape and film industry, and representing more than 80% of the European adhesive tape and film volume produced.

## Considerations of packaging applications of adhesive tapes and films

Adhesive tapes and films (see Annex I for definitions) are products designed for specific applications and used across diverse sectors: packaging, vehicles, aerospace, wind energy, EV batteries, healthcare, among many others. Depending on their application, they may function as packaging on their own (e.g. as components of packaging) or as part of packaging, as defined by the PPWR.

Some adhesive tapes and films are specifically designed by our industry for packaging applications (see details in Annex II). These tapes are designed and used in a way that they do not hinder the recycling of the main packaging material (e.g., adhesive tapes used to close cardboard boxes do not pose challenges to paper recycling).

Other adhesive tape and film products are designed for non-packaging applications; they may be used to enable or facilitate a process (upon which they are removed) or become permanently attached to a product or object (see Annex III). The specific application they are designed for dictates several design features of the products, such as resistance to certain conditions (e.g. heat, temperature, humidity, solvents, pH, etc.), or functionality (e.g. easy separation, conformity, durable attachment, etc.). For instance, self-adhesive tapes and films for industrial use, commonly called process films, are used in business-to-business relations throughout different stages of production and could remain within the final product. The applications detailed in Annex III should not be considered packaging under the PPWR.

## Conclusion

Adhesive tapes and films designed for packaging applications are expected to be compliant with all requirements for packaging materials under the PPWR; conversely, adhesive tapes

and films designed for non-packaging applications do not necessarily fulfil the PPWR requirements for packaging materials.

To provide clarification to the adhesive tape and film industry, we urge the European Commission to introduce a delegated act amending Annex I of the PPWR to modify the indicative list of items considered as 'non-packaging' to include *'self-adhesive film for industrial use, commonly called process films, used in business-to-business relations throughout different stages of production or intended to be sold with the final product'*. While waiting for the amendment of Annex I, we recommend providing clarification through a Guidance document to be drafted by the European Commission after the PPWR's entry into force.

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## Annex I

### Definition of adhesive tapes and films, and their components

The European standard EN 923:2016 “Adhesives – Terms and definitions” provides several definitions for adhesive tape products and components:

- *Adhesive tape*: flexible backing or carrier coated with a pressure-sensitive, remoistenable or heat activated adhesive.
- *Transfer tape*: carrier coated with a pressure-sensitive adhesive which, when detached from the substrate, permits the carrier to be removed leaving only the adhesive.
- *Double coated adhesive tape*: tape where the adhesive is applied on both sides of the carrier.
- *Pressure sensitive adhesive*: adhesive which in a dry state is permanently tacky at room temperature and adheres readily to surfaces under light and brief pressure.
- *Carrier*: flexible material to which an adhesive is applied. For the carrier of a single-sided tape the term “backing” is used.

Adhesive films are a kind of single-sided adhesive tape formulated for specific purposes, including protecting surfaces during industrial processes (process films) or during transport (packaging films).

### Definitions of packaging under PPWR

The PPWR defines several concepts in Article 3.

*Packaging* is defined in paragraph (1), of which a relevant excerpt follows:

(1) ‘packaging’ means an item, irrespective of the materials from which it is made, that is intended to be used by an economic operator for the containment, protection, handling, delivery or presentation of products to another economic operator or to an end user, and that can be differentiated by packaging format based on its function, material and design, including:

(a) an item that is necessary to contain, support or preserve a product throughout its lifetime, without being an integral part of the product, and which is intended to be used, consumed or disposed of together with the product;

(b) a component of, and ancillary element to, an item referred to in point (a) that is into the item;

(c) an ancillary element to an item referred to in point (a) that is hung directly on, or attached to, the product and that performs a packaging function, without being an integral part of the product, and which is intended to be used, consumed or disposed of together with the product;

[...]

Paragraphs (5)-(8) define some specific types of packaging:

(5) ‘sales packaging’ means packaging conceived so as to constitute a sales unit consisting of products and packaging to the end user at the point of sale;

(6) 'grouped packaging' means packaging conceived so as to constitute a grouping of a certain number of sales units at the point of sale, irrespective of whether that grouping of sales units is sold as such to the end user or whether it serves as a means to facilitate the restocking of shelves at the point of sale or to create a stockkeeping or distribution unit, and which can be removed from the product without affecting its characteristics;

(7) 'transport packaging' means packaging conceived so as to facilitate the handling and transport of one or more sales units or a grouping of sales units, in order to prevent damage to the product from handling and transport, but which excludes road, rail, ship and air containers;

(8) 'e-commerce packaging' means transport packaging used to deliver products in the context of sale online or through other means of distance sales to the end user;

Furthermore, paragraphs (43) and (44) define the concepts of *integrated component* and *separate component* of packaging:

(43) 'integrated component' means a packaging component, whether or not of the same material as, or distinct from, the main body of the packaging unit, that is integral to the packaging unit and its functioning, that does not need to be separated from the main body of the packaging unit in order to ensure the functionality of the packaging unit and that is typically discarded at the same time as the main body of the packaging unit, although not necessarily via the same disposal route;

(44) 'separate component' means a packaging component, whether or not from the same material as the main body of the packaging unit, that is distinct from the main body of the packaging unit, that needs to be disassembled completely and permanently from the main body of the packaging unit, and that is typically discarded prior to and separately from the main body of the packaging unit; including packaging components that can be separated from each other simply through mechanical stress during transportation or sorting;

## Annex II

### Examples of tapes and films designed for a packaging application

Type of tape	Detail and examples	Packaging status under the PPWR
Carton-sealing tapes	Single-sided tape (paper or filmic backing), used to close packaging items (e.g. cardboard boxes).	Part of packaging: integrated component; maybe (part of) group, transport or e-commerce packaging
Box closure tapes	Double-sided or transfer tapes covered with a release liner, that facilitate the closing or re-closing of containers (e.g. shipping boxes for e-commerce).	Part of packaging: integrated component; maybe (part of) group, transport or e-commerce packaging
Tear tapes	Single-sided tapes that are applied to a packaging (e.g. a cardboard box) to facilitate its opening.	Part of packaging: integrated component; maybe (part of) transport or e-commerce packaging.
Tabs for reclosing containers	Single-sided adhesive tabs incorporated onto a packaging that enable the re-closure of the packaging after opened (e.g. a flexible pouch).	Part of packaging: integrated component
Tapes used for securing parts during transport	Adhesive tape used to keep components (e.g. of appliances) together during shipping, which are removed prior to using the product.	Part of packaging: separate component; maybe transport packaging
Adhesive films with packaging functions	Films applied only at the end of a manufacturing process to protect surfaces of finished products (e.g. screens) during transport from the last manufacturing site to the end-user.	Packaging or part of packaging: separate component; maybe transport packaging

## Annex III

### Examples of tapes and films not designed for a packaging application

Type of tape	Detail
Tapes and adhesive films with processing functions	<p>Adhesive tapes and films designed to enable or facilitate a process or transformation, typically used professionally and/or industrially. Some examples are:</p> <p><i>Masking tapes:</i> used professionally, industrially and by consumers to partially cover surfaces while applying surface coatings or modifications; they are removed after the process is finished.</p> <p><i>Tapes and adhesive films with processing functions:</i> used industrially to protect surfaces throughout different stages of production in complex business-to-business supply chains. They facilitate or enable manufacturing processes that can include the conversion of one product into another one. A semi-manufactured product with the tape or film attached may be used in a subsequent application by the same or another economic actor in the supply chain, and may even remain in a final product made available to an end user.</p>
Fastening and construction tapes	<p>Adhesive tapes used in the assembly of diverse products, in construction or in post-modifications. These tapes are typically double-sided, are intended to be permanently applied to the product and become integral part of it; in some cases, they are also designed for debonding on demand (e.g. to enable removal or repairs). For example, they are used in the assembly of electronic devices, appliances and vehicles; to affix doors and windows in buildings; to place hooks, mirrors or shelves onto walls.</p>
Graphical films and tapes	<p>Adhesive films/tapes applied to vehicles or surfaces (e.g. glass, walls) with the purpose of identification or decoration, which become permanently attached to the surface during the use phase.</p>