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Navigating Regulatory Changes: A Tape Industry Perspective

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The pursuit of a sustainable and circular economy is a constantly evolving journey. As we make this transition, policies are essential in creating a level playing field. Since the European Commission adopted the **new circular economy action plan** and published the **chemical strategy for sustainability** in 2020, a series of regulations and proposed rules have been handed down by the European Union affecting companies based or operating in the EU. Navigating this **ever-evolving regulatory landscape** can be quite challenging.

To support the needs of the European adhesive tape industry, the Regulatory Affairs Working Group (RAWG) at Afera keeps a tab on all the policy updates. Having short-listed the topics that are of most relevance to the tape industry, **RAWG has created specific Task Forces** to identify the main priorities. The outcome of the discussions within these task forces is shared regularly with the **Advocacy workstream of Afera's Flagship Sustainability Project (AFSP)**, which then proceeds to develop the related position papers and guidance documents.

To find out more about the latest developments in European policies and their impact on the adhesive tape value chain, I spoke to **Pablo Englebienne**, Regulatory Affairs Manager at **Afera**.

SD: To start off, can you share how the creation of these specific task forces came about? Also, can you share some information on the other topics currently being discussed within the RAWG and the advocacy workstream of AFSP?

PE: We realised that the number of regulations that are within the European scope and could have an impact on the tape industry is expanding. While the impact of certain topics is larger on some companies than others, many companies are more actively following certain topics.

The RAWG comprises a network of volunteers from the Afera member companies, who share knowledge and experiences for common benefit. At Afera, we monitor the legislative developments and when we identify one that could have an impact, we specify – together with the members – what that impact may be and identify what we can do best to help the members and the sector. The priorities were mapped out in 2024 and by surveying the participants, we identified seven aspects to focus on.

Task force	Priorities identified
Packaging and Packaging Waste Regulation (PPWR)	<ul style="list-style-type: none"> • Define which tapes/tape components are packaging and which ones are not • Follow the development of design of recycling (DfR) guidelines • Understand the requirements of PPWR applicable to the general packaging of tape products • Understand how PPWR impacts imported products

PVC REACH Restriction	<ul style="list-style-type: none"> • Follow the development of the restriction • Share information with members as it becomes available
Microplastic REACH restriction	<ul style="list-style-type: none"> • Share information on the responsibilities of tape manufacturers
EU Deforestation Regulation (EUDR)	<ul style="list-style-type: none"> • Understand what are considered as “relevant products” under the EUDR: raw materials and tape products • Provide guidance to members regarding steps to ensure compliance • Liaise with authorities as needed
Green Claims Directive (GCD)	<ul style="list-style-type: none"> • Understand the timeline for the legislative process, transition periods and enforcement • Understand the consequences for the tape industry, what to watch out for and how to seek further assistance
Corporate Sustainability Reporting Directive (CSRD)	<ul style="list-style-type: none"> • Exchange experiences and learnings from members on preparing for reporting
Corporate Sustainability Due Diligence Directive (CS3D)	<ul style="list-style-type: none"> • Exchange experiences and learnings from members on preparing for reporting

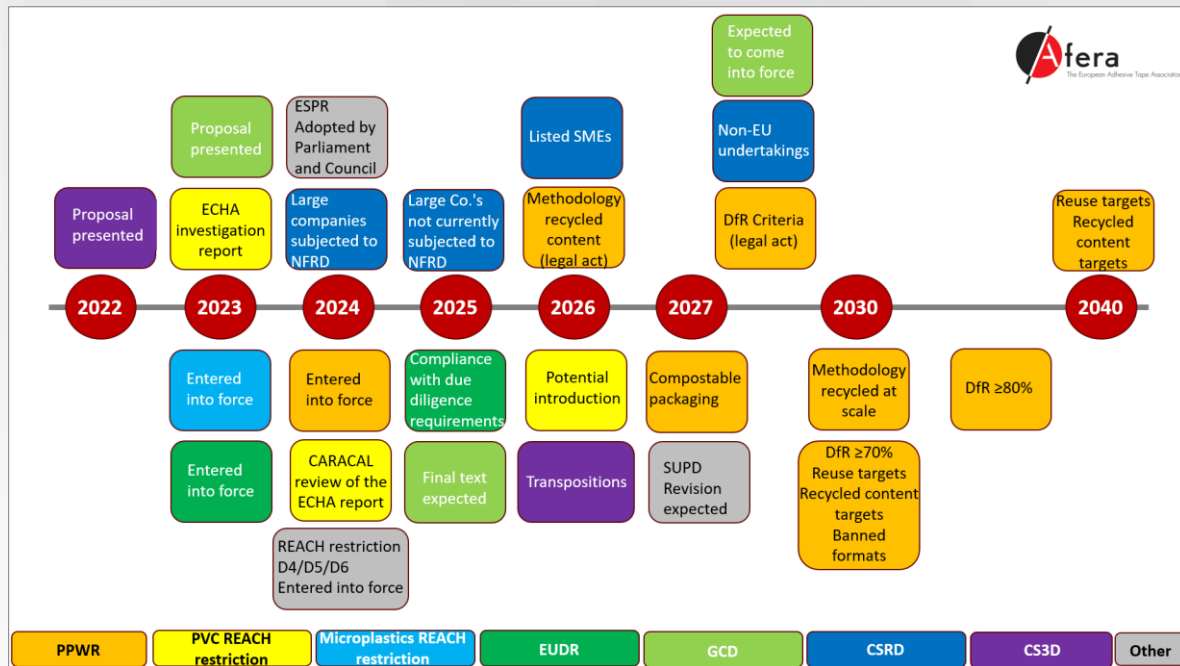
Table 1. Key priorities identified for topics of maximum relevance to the tape industry

SD: At last year’s [Annual Conference](#), the conference program included interesting presentations on life cycle assessment (LCA) and a detailed talk on CSRD. What were your key takeaways from these sessions?

PE: Indeed, Maria Pia Spinelli gave a great presentation on what LCA is all about, focusing on how it relates to legislation such as the Eco-design for Sustainable Products Regulation (ESPR) and the proposed Green Claims Directive (GCD). My take-home message from her presentation was that LCA is no longer a “nice to have”, but a “must do” for any type of product placed on the EU market.

Bastian Lehmann gave a detailed talk on CSRD, which was tailored to the supply chain and processes used in the adhesive tape industry. His presentation made attendees aware of the amount of effort required – from assessing the materiality of the impact of their operations to collecting all necessary information to prepare a report – to remain compliant with the requirements of the CSRD.

Collectively, these presentations highlighted how data and transparency are becoming increasingly important to demonstrate the sustainability of products to both consumers and regulators.



Regulatory landscape and timeline map

SD: Finally, can you provide us with a sneak peek into the expected policy developments and what the European adhesive tapes industry needs to watch out for in 2025 and beyond?

PE: In 2025, we will experience both – further development and application of existing or ongoing legislation, as well as the development of a new working plan for the European Commission and Parliament.

Within the first category, quite a few are noteworthy. Even though the PPWR was just recently finalised, many details of its implementation will come in the secondary legislation (such as design for recycling criteria for packaging). This will be drafted by the Commission in the next couple of years. We will also most likely see a proposal for a REACH restriction of PVC and/or PVC additives being drafted, as well as the development of other potential REACH restrictions being evaluated. The dialogues of the Green Claims Directive should be finalised in the coming months, which will then lead to its transposition into national legislation. The full implementation of the postponed European Deforestation Regulation is due end of 2025.

Concerning the future, the second von der Leyen Commission wants to focus on increasing the competitiveness of the European industry. A key aspect of this plan is the Clean Industrial Deal, which is due to be launched at the end of February 2025. This framework will include, among others, an Affordable Energy Prices Action Plan, an Industrial Decarbonisation Accelerator Act, a Circular Economy Act and a Chemical Industry Package. Within the latter, a review of the REACH Regulation will be produced, which will likely bring – among many other measures – a requirement to register polymer substances.

Afera, through actions within the RAWG and the Advocacy workstream, will continue to monitor these developments and support the needs of the European adhesive tapes industry.