

The Hague, 23 April 2023

Afera feedback to public consultation on review of Packaging and Packaging Waste Directive

Afera, the European Adhesive Tape Association, welcomes the opportunity to provide feedback on the European Commission's proposal to revise the Packaging and Packaging Waste Directive.

Adhesive tapes are broad category of products that have a myriad of applications in everyday life. The most recognizable application is the packaging tape, that is used to close millions of boxes shipped from, to, and within the EU on a daily basis. Beyond this, adhesive tapes are used in many other applications, some of them related to packaging but many not.

We would like to provide feedback on the following aspects of the proposal:

1. **Packaging definition.** A definition of *packaging* is provided in Article 3 (1), and some specific examples of packaging and non-packaging products are detailed in Annex I. We believe that the current definitions and examples leave room for interpretation and fail to provide certainty on the requirements products placed in the market need to fulfil. For instance:
 - a. **Release liner.** Many adhesive tapes (the ubiquitous packaging tape not being one of them) incorporate a release liner that protects the adhesive from attaching to unwanted surfaces. The release liner is an essential component of these tapes in their manufacturing, transportation, conversion as well as for their application. The release liner turns to waste concurrently with the tape being applied to bond surfaces together. Without the release liner, these tapes simply cannot be constructed or enabled to perform; there is no option to replace a release liner while keeping the functionality. In the case of double sided tape (with adhesives on two sides of a backing), the release liner is an essential part of the construction as these tapes could not be unwound from the roll without the presence of a liner. The same is true for special combinations of adhesives and backings in the case of single sided tapes. Release liners for adhesive tapes are composed of a paper or plastic backing with a thin release coating, typically silicones. These materials can be recycled in an open or closed loop, forming a valuable source of secondary raw materials for diverse industries. Due to their coating, release liners benefit from being collected for recycling in a separate stream to facilitate an efficient removal of the release coating and to avoid negatively affecting the performance of other packaging material recycling streams. For these reasons, we believe that release liners should not be considered packaging material. **We propose to include an entry in Annex I under *Not packaging* to include "Release liner from adhesive tapes".**
 - b. **Tapes with packaging application.** Varied adhesive tape products have applications in packaging, either as packaging products by themselves or, more commonly, as components of units of packaging. Some examples of the latter are: single-sided tapes applied to close units of packaging; double-sided tapes incorporated in units of packaging to facilitate (re-)closing; tear tapes embedded in units of packaging to facilitate their opening. These products are typically *integrated components* (as per Article 3 (34)) of packaging units. On the other hand, products used to protect surfaces (e.g. glass, screens, metals) from scratches during transportation that are removed by the end-user would be

considered *separate components* (as per Article 3 (35)) of a packaging unit. **We propose to include an entry in Annex I under *Part of packaging* to include “Adhesive tapes incorporated into packaging units as integrated or separate components”, and an entry under *Packaging* to include “Adhesive tapes that are applied onto products but removed prior to use”.**

- c. **Tapes without packaging application.** Many adhesive tape products are intended to be used for transient applications that require its application onto a product and posterior removal, with the goal of enabling, facilitating or increasing the efficiency of a process; for instance, masking tapes or process tapes. Another type of tape products are intended to cover surfaces permanently, or at least for a foreseeable long time, to impart or modify a function of the surface: glass covers, graphical films for vehicles, etc. These kinds of tapes could be understood to be used to “protect, contain or handle” the product they are attached and could be considered as packaging material under Article 3 (1) (a), but they do not fulfil a packaging function: they are either discarded after their function is no longer needed or desired, or they remain permanently attached to (thus becoming an *integral part of*) a product for its complete lifespan. **We consider that these products and applications should be explicitly exempted from being considered packaging.**
2. **Recycled content.** Adhesives are polymeric materials that are ubiquitously used in small amounts in packaging, enabling their function and favouring the minimization of packaging. Adhesives are not the target of current recycling processes, in contrary to many other plastic materials that form the core of the weight of packaging units. Article 3 (43) defines plastic as *polymers that can function as a main structural component of packaging*, which could be understood to encompass adhesives but most likely unintendedly, as adhesives are explicitly not considered plastic under the SUPD. **We propose to exempt adhesives from being considered as plastic under Article 3 (43), as well as not contributing to the “plastic part of packaging” for the calculation of recycled content in Article 7.**
3. **Post-consumer recycling.** The requirement in Article 6 for packaging products to be recyclable does not specify the allowable recycling processes to achieve it. Adhesive tapes are designed to enable the recycling of the packaging material they are attached to, but the tapes themselves are not easy to recycle by conventional mechanical recycling. Adhesive tape waste could, however, be a good feedstock for advanced recycling processes such as pyrolysis or gasification. **We consider that advanced recycling should be explicitly considered as an additional possibility to recycle packaging materials that may not be suitable for mechanical recycling.**
4. **Reusable packaging targets.** Article 26 defines targets for reuse/refill for different applications.
 - a. Reusable packaging systems are proposed in several paragraphs of Article 26; these recommendations seem to stem from recital (90), based solely on the prevention of waste from single-use packaging. **We consider that the recommendation to implement a reuse system for a specific application should be based on a complete life cycle assessment of the different alternatives, including the environmental impact of return logistics, reconditioning of packaging, as well as consumer health and safety.**
 - b. Paragraph (1) mandates that “large household appliances” placed in the market within a member state must be made available in reusable transport packaging. This paragraph refers to point 2 of Annex II in Directive 2012/19/EU, which corresponds to “small household appliances”, which we consider to be a typo. Large household appliances (e.g. fridges, washing machines, heaters) are complex devices with components that need to be specifically addressed during

transport. Adhesive tapes are in many cases used for this purpose, either for holding product components in place (e.g. cables, shelves, doors, etc.), or to protect surfaces (glass, metal, plastic) during transport. These adhesive tapes fulfil a unique role in the protection of (components of) appliances, but due to their nature they typically cannot be reused. The multi-component units of packaging required for safe and efficient transportation of large appliances would be difficult, if at all possible, to be replaced by a fully reusable transport packaging without resorting to some single-use packaging components that overall account for a minuscule fraction of the weight of the packaging of the product. **We consider that if a reuse system for transport packaging of large appliances is to be implemented, there should be an allowance for some single-use packaging components.**

5. **Design for recycling guidelines.** Article 6 does not define a timeline for the development of DfR guidelines, but sets a firm entry into force by 1 January 2030. Economic actors need sufficient time to adapt their processes to ensure compliance with new requirements. Additionally, the proposal is not clear on how these guidelines would be compiled nor on how suppliers of packaging and other stakeholders would be involved in this process. **We propose to 1) define the initial entry into force of the Article 6 requirements 5 years after official publication of DfR guidelines; 2) include a provision that harmonised DfR criteria are to be developed by European standardisation organizations, with a clear timeline and process, and involving all relevant stakeholders; and 3) not define any negative list of packaging characteristics prior to the agreement of DfR criteria involving state-of-the art recycling processes.**

Afera counts 120 members in 20 countries covering the complete value chain of the adhesive tape industry and representing more than 80% of the European tape volume produced. Afera is committed to enhancing the sustainability of the adhesive tape product category and to elevate circularity by ensuring recyclability, reusability and repairability of the products incorporating tapes.

Afera, The European Adhesive Tape Association
P.O. Box 85612, 2508CH The Hague, The Netherlands
+31 70 312 3916 | mail@afera.com | www.afera.com
Transparency Register Identification 787457223676-97