

EU Green Deal: Analysing the Regulatory Impact on Tapes Industry

In recent years, several new regulations and initiatives have come up – the most significant one being the European Green Deal. With major strategies like the Chemical Strategy for Sustainability and the Circular Economy Action Plan, there is additional pressure to increase the sustainability of the complete value chain by optimizing the use of resources, reducing waste, and avoiding hazardous substances.

Sreeparna Das spoke to **Pablo Englebienne**, Regulatory Affairs Manager at **Afera**, to find out more about the latest developments in European policies, their impact on the adhesive tape value chain, and Afera's role in monitoring and anticipating key regulatory developments and providing concrete approaches to contribute to the EGD.



SD: To start off, can you help us identify the key framework initiatives and specific measures within the EGD that are most relevant for the adhesive tapes industry?

PE: Within the European Green Deal, there are a couple of sub-strategies that are of particular interest and each of these strategies has individual measures. The two that are of most relevance for the adhesive tape value chain are the **Circular Economy Action Plan (CEAP)** and the **Chemicals Strategy for Sustainability (CSS)**.

With regards to CSS, **REACH and the Classification, Packaging and Labelling (CLP) regulations** are being reinforced as EU's foundations for regulating chemicals. There are several aspects of importance, some of which have already been worked on in the past – the **REACH polymer registration**, for instance – that are really going to take shape in this update of the regulation. In addition, some new concepts are being brought in like the **Mixture Assessment Factor (MAF)**, which can affect either how chemicals are being used or if chemicals will be used at all for some processes, and the **Safe and Sustainable by Design**. The chemical industry is well aware of how to work safely with chemicals but will now also need to address the challenge of how to work sustainably with them. And lastly, several high-level discussions that include the industry, the authorities, and members of the European Commission are also on-going on the topic of **Essential Use of Chemicals**.

The challenge here is to have a clear understanding of what counts as 'essential use' and how essentiality is defined. The industry is advocating for risk assessments and Cefic, being the voice of the chemical industry, is taking the lead in that.

It will be important for all the members in the tape value chain to be aware of the requirement of assessing the supply chain on the use of chemicals and how products are formulated.

Moving on to the CEAP, there are three key areas in focus including the **Packaging and Packaging Waste Directive (PPWD) update**, the recently announced **Sustainable Products Regulation (SPR)**, and an overarching measure that aims to avoid plastic waste and increase the content of recycled plastic in several markets, with a specific mention of packaging, construction and automotive, which are highly relevant for the tapes industry.

SD: You mentioned three main industries including packaging, which has been the centre of attention with several measures focusing on reducing waste and improving circularity. How do you see these impacting packaging tapes?

PE: Indeed, there are several initiatives that specifically target plastic waste and in the case of packaging, there are four important ones. First, there is the PPWD, which is currently being revised. So far, there has been no mention of plastic packaging tapes in the on-going discussions. But some of the updates being discussed might have a direct or indirect impact on tapes. For instance, one of the measures the Commission is pushing for is to **separate the waste streams of recyclable and compostable plastics**. This translates into making a clear distinction between applications that use only compostable plastics and those that use only traditionally recyclable plastics. Accordingly, all the packaging components, including tapes, would need to meet the requirements. For example, if the packaging of fruits and vegetables needs to be compostable, then the associated film, adhesives, and tapes would need to be compostable as well.

The PPWD is also looking at the **definition of recyclable packaging**. The working definition currently under discussion is that about 95% of the functional unit of packaging needs to be recyclable. More clarity is needed on the definition of the functional unit but it will most likely consider the whole packaging, which may include tapes in certain applications.

This means that either the tape must fall within the 95% that is recyclable or ensure that it does not hinder the recycling of the packaging. This could apply to both, plastic-based packaging and also fibre-based packaging, where the packaging tape is mostly used.

Then there is also **the Single-use Plastics Directive (SUPD)**, which was passed 3 years ago and came into effect last year. Overall, the aim of this directive was to reduce the presence of specific single-use plastic products that appeared on EU beaches. Tapes can be considered single-use plastic items, but so far have not been targeted in the measures of the SUPD. However, this directive will be reviewed again in 2027 and more single-use items may be identified and included within the scope.

Next, we have the **plastic packaging taxes** that are now being implemented in several former and current EU member states and at Afera, we are analysing the impact these may have on the tape industry. The **UK Plastic Packaging Tax (PPT)** is the one that was enforced earlier this year. Any plastic packaging that has more than 30% recycled plastic content is exempt from paying the tax. And so, there is a big push for having products that can comply with this requirement. Spain and Italy are also working on implementing such taxes that are expected to come into force next year. But based on initial discussions, these will likely involve different requirements and exemption criteria.

It is a pity that these types of measures, which can spark innovation to promote circularity and the uptake of recycled plastic as a raw material at the required scale, are not being harmonized across the EU!

The fourth measure – expected to be finalized soon – is the one related to the **restriction of microplastics**. According to this, any presence of microplastics would have to be at least notified and communicated along the value chain. The initial focus of the Commission has been on microplastics from textiles, tyres, and plastic pellets, but here, coatings and adhesives also do fall within the scope.

SD: It will be very interesting to see how all these measures will evolve going forward! Now, moving beyond packaging, can you elaborate more on the regulatory requirements for the other two industries you mentioned i.e. transport and construction?

PE: The automotive industry has been very advanced in requiring information about the composition of the products that go into the tapes. There is the International Material Data System (IMDS) that has been in place for many years now. But now the SPR will further expand this with the inclusion of **eco-design guidelines**. And because most of this information is already available in the vehicle industry, the OEMs are ready to go into discussions with their manufacturers to ensure that the materials that they use are more sustainable.

This compositional information will also be relevant for applications other than vehicles. Specifically for construction products, one of the latest developments from the Commission is the **Construction Product Regulation (CPR)**, for which the legal text was published at the end of March this year. It is clear that we are getting closer to requiring substantiation of the environmental impact of construction products by **Environmental Product Declarations or EPDs**. We are currently assessing this within Afera's flagship sustainability project and recently facilitated a [presentation on EPDs](#) by **Dr. Heinz Werner Lucas**, an expert consultant at **FEICA**. During his talk, he shared details of the

model EPD system developed for the adhesives industry and provided ideas on how the tapes industry could benefit from the approach.

SD: In your view, what are the main challenges in advancing the sustainability and circularity of adhesive tapes? And how can Afera support the industry in overcoming them?

PE: The ubiquity and invisibility of tapes and their ease of use make them a very attractive solution for very many diverse applications. They are included in one way or another in the **most essential consumer products** used in daily life like cell phones, transportation, packaging, etc. And so, it is important to make sure that one can use the manufacturing processes that enable the production of these products.

The main challenge is to ensure that the solutions tapes enable result in more sustainable products i.e. products that are easier to recycle, repair, or upgrade. When we talk about recycling, either of the release liner or tapes, there is this issue of scattering of the materials because tapes go into a lot of different products in small amounts that go all over the place. These need to be collected separately for recycling or recovery, which presents a big logistics problem.

Many individual companies are exploring different solutions independently from each other. Instead, the whole value chain – tape manufacturers and users of tapes – must work together to bring enough volume and develop a solution to this problem.

As a common platform, **Afera** can support sharing of relevant information and key learning, and foster collaboration to push the required technologies and sustainable solutions forward. Most of these topics fall under the scope of [Afera's flagship sustainability project](#) and are being currently evaluated for the benefit of the whole tape value chain.

SD: As the project coordinator of Afera's Flagship Sustainability Project (AFSP), can you share more about the project goals?

PE: The project has **three pillars** that focus on the calculation of environmental impact, waste management, and advocacy. For **environmental impact**, the main goal is to have a harmonised method to calculate the environmental impact of adhesive tapes. The **waste management** workstream has been working on the recycling of the release liner and how on-going initiatives can be leveraged by the tape industry. We will also start working soon on actions needed to recycle tape waste. And finally, for **advocacy**, the aim is to assess new and upcoming regulations and guidelines on sustainability and how they specifically impact the tape value chain, providing information to members and educating tape users.



SD: Since we are talking about the impact of regulatory updates specifically, can you shed some light on the current priorities for the Advocacy Workstream?

PE: Within the advocacy workstream, we have been working on several activities in the last few months and are making good progress. One of the key topics in focus since the beginning has been to understand the requirements of **ISCC PLUS certification for tapes** as it generated a lot of interest amongst Afera members at the annual conference last year in Valencia. Based on our assessment, we found the raw material suppliers to be quite active in this space and anticipate that ISCC certification could become part of the value proposition for tape manufacturers in the near future as well. The UK PPT, for instance, requires certification of the recycled content in the packaging tape. But, no certified tapes exist in the market today, and to support the tape manufacturers in this endeavour, we are developing guidance on how they could get their products ISCC PLUS certified.

We've also done a deep dive to understand the impact of the **SUPD and future developments**. This will be put into one document to clarify this issue for the tape value chain and tape users. A similar document is also being prepared on **the UK PPT** to help tape manufacturers and buyers understand more about the products that are liable for the tax, exemption criteria, and **how the tax is calculated specifically for tapes**.

Based on initial assessments within the advocacy workstream, we are working on creating documents to clarify the impact of SUPD and the UK Plastic Packaging Tax on the adhesive tape value chain and are developing a series of guidance documents on various topics including ISCC PLUS certification of tapes and the sustainable use of tapes.

Another topic that came up during the workstream meetings was the need for **guidance on the sustainable use of tapes**. Aimed at tape users, we are developing a document that will inform them of the available design choices and how they can use tapes in the most sustainable way. Apart from reducing the use – an important tenet of sustainability – and ensuring efficient use of tapes, it is important for tapes to be (re)designed for recycling. A lot of information is already available for packaging materials in the **Design for Recycling (DfR) guidelines** published by, for instance, **4evergreen alliance** for fibre-based packaging and **RecyClass** for both rigid and flexible plastic packaging. These will provide useful reference for the preparation of guidelines for tapes.

Beyond this, we're also monitoring the new legislations such as the **sustainable products regulation** and **the construction products regulation** within the workstream to understand their impact on tapes. To do so, we are planning to engage in in-depth discussions with other stakeholders from the European Commission and other associations.

SD: I think it would be fair to conclude that the regulatory space will remain dynamic going forward. 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?

PE: Yes, exactly! Expected to be passed within the second quarter of this year is the notification and communication requirement for microplastics along the value chain, which has been delayed since 2021. Also, as we discussed before, the PPWD update is scheduled to be announced soon i.e. on July 20th, 2022. However, I wouldn't be surprised if it gets delayed because the Commission needs to make several important decisions.

An essential point to note here is that the packaging and packaging waste directive will, most likely, be converted into a regulation. This would mean that the legal text will become harmonised across Europe, which will leave less room for individual member states to develop their own criteria or go beyond the scope of the legislation.

Then, towards the end of 2022 or the beginning of 2023, we can expect the updated REACH and CLP regulations, which will provide more clarification around the restriction or ban on certain substances. Specifically, more information on REACH polymer registration, mixture assessment factor, the essential use of chemicals, and safe and sustainable by design concepts are expected.

And finally, the SPR that is currently in draft legal form is not finalised yet but is very close to getting there. In any case, the details of the implementation that will come for specific applications or products will come as separate pieces of legislation in the so-called delegated acts that the Commission alone has to bring forward. The roll-out is expected to take place over a period of time and we'll continue to monitor the developments in the coming years.