Translating the E.U. PPWR for the adhesive tapes industry

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For most businesses across the European adhesive tape value chain, one of the foremost concerns is staying informed about, engaging with, and complying with evolving legislation. A central focus is the **Packaging and Packaging Waste Regulation (PPWR)**, a pivotal EU initiative aimed at minimising packaging waste and its environmental footprint.



The regulation is guided by several overarching objectives:

- Restrict unnecessary packaging
- Promote reusable and refillable packaging
- Make all packaging recyclable
- Increase use of recycled content in packaging (plastics)
- Harmonise labelling of packaging to support recycling

It was published in the Official Journal of the European Union on 22 January 2025 and came into force on 11 February 2025. The general provisions of the PPWR will begin to apply around August 2026, although certain elements will be subject to extended transition periods.

Understanding the impact on the tape industry

The PPWR is considered one of the most complex pieces of EU regulation to date and the requirements set out by this legislation will fundamentally change packaging design in the EU.

At the recently concluded European Tape Week, Dr. Dennis Bankmann (<u>Emerging Motif</u>) provided clear and concise information about the aspects of tapes that are in scope of the PPWR and the requirements that may apply to tapes (detailed in the tables 1 and 2 below).

In scope	Not in scope	May be in scope
Tapes used on packaging and tapes that constitute packaging	Tapes used to produce packaging (i.e., the tape does not become	Tapes for the bundling of items
The packaging of tapes	part of the package)	Tapes used for secure transport
(e.g., wrapping film, blisters, cardboard, secondary & logistics packaging)	Tapes used for other applications (e.g., construction, electrical, automotive)	Tape handles & protective tapes

Table 1: Which aspects of tapes are in scope?

Requirements expected to apply	Requirements that may apply partly	Requirements that may apply only in specific cases
Compatibility with recycling	Minimisation	Recycled content for plastics
Article 6	Article 10	Article 7
	Reduction of the overall amount	Relevant if a plastic tape
Requirements on Substances Article 5	of packaging	constitutes packaging
PFAS exclusion, thresholds for		Compostability
heavy metals		Article 9
		Reusable transport packaging Article 29
		Cardboard boxes are excluded
		from the scope

Table 2: What will be required for tapes under PPWR?

Navigating the PPWR: Afera's role and actions

At Afera, we actively monitor all **chemical and tape-related regulations relevant to the European market**, working closely with EU authorities and regulatory stakeholders to ensure the industry's interests are represented and addressed. These efforts are led by Afera's Regulatory Affairs Working Group (RAWG), which identifies and prioritises key regulatory topics impacting the sector.

For the PPWR, the priorities identified by Afera RAWG include:

- Clarifying the classification of tapes and their components to determine which are considered packaging.
- Tracking the development of Design for Recycling (DfR) guidelines, ensuring that tape products align with future recyclability standards.
- Understanding the implications of the PPWR for the general packaging of tape products.
- Assessing the impact of PPWR on imported products, helping members navigate compliance across borders.

Translating policy into industry progress

As the EU's Packaging and Packaging Waste Regulation (PPWR) continues to evolve, Afera has played a pivotal role in ensuring the adhesive tape industry's voice is heard and its complexities understood. From early advocacy against the proposed "negative list" to ongoing efforts clarifying the status of process films and release liners, Afera has consistently championed a **balanced**, **evidence-based approach to regulation**.

Through its position papers, collaboration with partners like FINAT and CELAB, and active participation in CEN working groups, Afera is not only shaping policy outcomes but also equipping its members with the tools and guidance needed for compliance.

Timeline	Milestone / Action	Focus / Outcome
Oct 2022	Afera published a <u>position paper</u> opposing the EC's proposed "negative list" in the revised PPWD.	Advocated for a technology-agnostic DfR approach; EC ultimately excluded the negative list from PPWR.
Apr 2023	Afera submitted <u>feedback on the revised</u> <u>PPWD</u> , informed by member input.	Addressed packaging definitions, recycled content, reuse targets, and DfR guidelines.
Dec 2024	Afera released a <u>common industry position</u> on adhesive tapes and films under the PPWR.	Clarified packaging status of tapes and films; identified grey areas like surface protection films and release liners (RL).
May 2025	Meeting with EC officials confirmed that process films used during manufacturing are not packaging.	Clarification expected in upcoming Commission FAQ.
Jul 2025	Task force meeting scheduled to advance release liner advocacy.	Aim: regulatory clarity on RL status under PPWR.
Sept 2025	Afera's advocacy on process films confirmed successful; For release liner advocacy, Afera, FINAT and CELAB to develop a joint position paper under	EC FAQ to clarify process film status; RL paper focuses on supply chain complexity and technical function.
Sept 2025	A new draft of DfR classification (green/yellow/red) circulated to CEN participants.	Classification system for recyclability; final draft expected by year-end.
Late 2025 / Early 2026	Finalisation of Afera's internal DfR guidance expected.	Includes decision trees and recycling stream workflows for various tape applications.

Table 3. Afera's key actions and milestones related to PPWR advocacy

By translating regulatory frameworks into practical, industry-specific strategies—such as the development of Design for Recycling (DfR) guidelines—**Afera is helping to future-proof the sector** and drive meaningful progress toward a more circular, competitive, and sustainable packaging landscape.

To stay up to date with the latest on regulatory affairs, visit: https://afera.com/regulatory-affairs/