

Adhesive tapes and the Single-Use Plastic Directive (EU) 2019/904

Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment, also known as the “EU Single-Use Plastic (SUP) directive” or SUPD, was [approved at the European Union level in June 2019](#).

The [aim of the SUPD](#) is to reduce the amount of plastic marine litter arising from the use of single-use plastic products as well as fishing gear.

The SUPD establishes measures aiming at reducing consumption, introducing design and/or marking requirements, and EPR schemes for producers of some SUP products, as defined in the [Annex to the SUPD](#).

Being a directive, EU member states needed to transpose the Directive into national law by 3 July 2021. The EU Commission published in June 2021 a [Guidance Document](#) for the national transposition, the *Commission guidelines on single-use plastic products in accordance with Directive (EU) 2019/904 of the European Parliament and of the Council of 5 June 2019 on the reduction of the impact of certain plastic products on the environment*. This document was intended to provide further interpretation of the details of implementation of the SUPD for the development of national guidelines.

Status of adhesives under the SUPD

The SUPD article 3(1) states:

‘plastic’ means a material consisting of a polymer as defined in point 5 of Article 3 of Regulation (EC) No 1907/2006, to which additives or other substances may have been added, and which can function as a main structural component of final products, with the exception of natural polymers that have not been chemically modified.

While adhesives are typically made from polymeric materials that do not occur naturally, the SUPD also states in Recital 11:

for the purposes of this Directive, the definition of polymer in point 5 of Article 3 of Regulation (EC) No 1907/2006 [the REACH Regulation] should be adapted and a separate definition [of plastics] should be introduced. [...] Paints, inks and adhesives should not be addressed by this Directive and therefore these polymeric materials should not be covered by the definition.

The Guidance Document further clarifies under point 2.1 (‘Plastic definition’) whether adhesives are considered to be a ‘plastic’:

Recital 11 explicitly points to paints, inks and adhesives as polymeric materials, which are excluded from the scope of the Directive and not considered to fall under the definition of plastic in point (1) of Article 3.

Furthermore, the Guidance Document also state under point 2.1:

a final (otherwise) non-plastic product to which they [paints, inks and adhesives] are applied is not a single-use plastic product under this Directive

In summary:

- Synthetic polymeric adhesives are considered polymers under REACH (Regulation (EC) 1907/2006), but are not considered plastics under the SUPD (Directive (EU) 2019/904);
- Non-plastic products that incorporate these synthetic polymeric adhesives are not considered plastic products.

Single-use plastic products under the SUPD

Article 3(2) of the SUPD defines single-use plastic products as :

'single-use plastic product' means a product that is made wholly or partly from plastic and that is not conceived, designed or placed on the market to accomplish, within its life span, multiple trips or rotations by being returned to a producer for refill or re-used for the same purpose for which it was conceived

Recital 12 of the SUPD states that some exclusions to this generic definition are foreseen:

The definition should exclude plastic products that are conceived, designed and placed on the market to accomplish within their life span multiple trips or rotations by being refilled or re-used for the same purpose for which they are conceived. Single-use plastic products are typically intended to be used just once or for a short period of time before being disposed of. Wet wipes for personal care and domestic use should also be within the scope of this Directive, whereas industrial wet wipes should be excluded.

Adhesive tapes

Adhesive tapes are considered articles under the REACH regulation, composed of several constituents such as a carrier material or backing, adhesives, and in some cases a release liner with a release coating.

The nature of the carrier material is very diverse, including several options incorporating plastics as films, non-woven materials, etc. Adhesives used are also diverse, but largely consisting of synthetic polymer adhesives. Some tapes incorporate a release liner made from paper or a polymer film coated with a release coating, typically a silicone polymer.

Status of adhesive tapes under the SUPD

Article 2 of the SUPD defines the scope of application of the Directive as *"the single-use plastic products listed in the Annex, to products made from oxo-degradable plastic and to fishing gear containing plastic"*.

The [Annex to the SUPD](#) mentions ten types of items being addressed by the Directive:

- Cotton bud sticks
- Cutlery, plates, straws and stirrers
- Balloons and sticks for balloons
- Food containers
- Cups for beverages
- Beverage containers
- Cigarette butts
- Plastic bags
- Packets and wrappers
- Wet wipes and sanitary items

Therefore in the current implementation of the SUPD, there are **no direct measures influencing the design or use of adhesive tapes.**

Future potential developments

Recital 32 of the SUPD states that the SUPD should be evaluated in the future:

evaluation should provide the basis for an assessment of possible further measures, including the setting of Union-wide reduction targets for 2030 and beyond, and an assessment whether, in view of monitoring of marine litter in the Union, the Annex listing single-use plastic products needs to be reviewed and whether the scope of this Directive can be broadened to other single-use products.

[Article 15 of the SUPD](#) specifies that this evaluation should take place by 3 July 2027.
