

FOR IMMEDIATE RELEASE

Navigating regulatory changes: A tape industry perspective

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The pursuit of a sustainable and circular economy is a constantly evolving journey. During this transition, enacting policies is 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 has been handed down by the European Union affecting companies based or operating in the E.U. 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, the European Adhesive Tape Association, keeps tabs on all the policy updates. Having short-listed the topics which are of most relevance to the tape industry, the **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)**, that 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**:

Task forces and topics

SD: *To start off, could you share how the creation of these specific task forces came about? Also, could 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 which are within the European scope and could have an impact on the tape industry is expanding. While the impact of certain topics is greater on some companies than others, many companies are more actively following certain topics.*

The RAWG comprises a network of volunteers from Afera's 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 our members and the sector as a whole. The priorities were mapped out in 2024 and by surveying the participants, we identified seven aspects on which to focus.

Task force	Priorities identified
Packaging and Packaging Waste Regulation (PPWR)	<ul style="list-style-type: none"> • Define which tapes and tape components are packaging and 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 “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

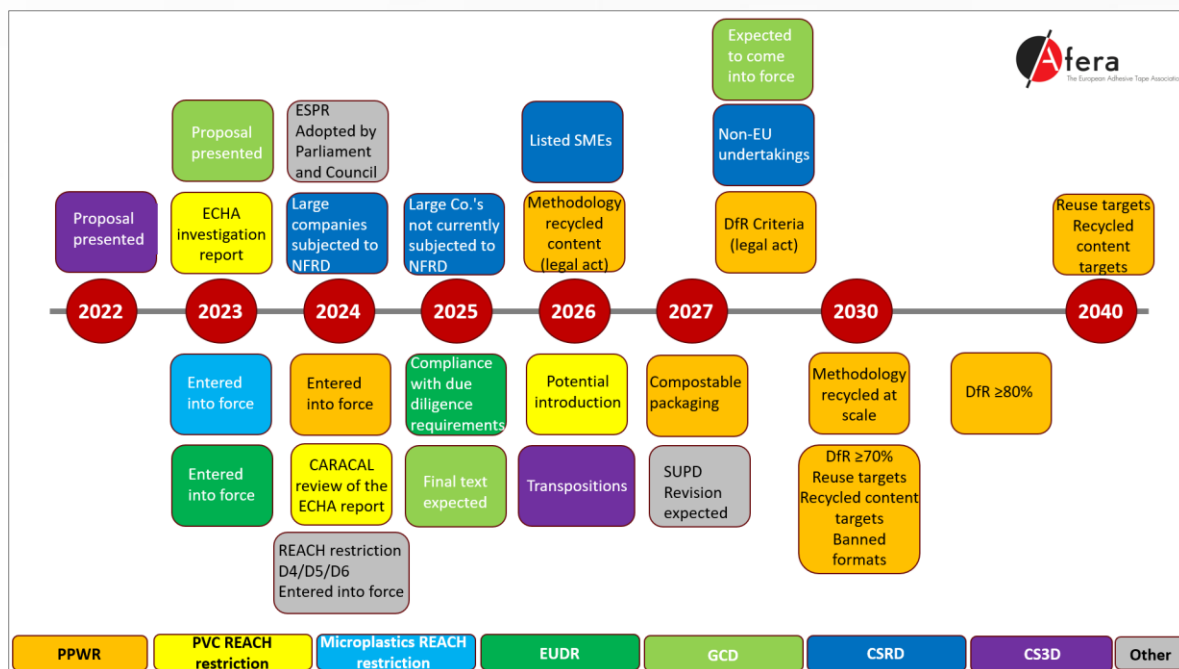
LCA and CSRD

SD: At last year's [67th Annual Conference](#), the working 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 E.U. 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

What is on the horizon

SD: *Finally, could 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 over 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 trialogues 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 at the 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.



Afera Regulatory Affairs WG Meetings 2025

- 1 April 2025, 9:00-12:00 (CEST), online + Düsseldorf, Germany (Hybrid)
- 19 June 2025, 14:00-16:00 (CEST), online
- 4 September 2025, 14:00-16:00 (CEST), online
- 4 December 2025, 14:00-16:00 (CET), online

For more information, visit www.afera.com.