

CheMI keeps tapes in the chemicals-policy debate

Through CheMI, Afera strengthens the adhesive tape value chain's downstream-user voice as REACH, CLP, ESRP and product-information rules become more closely connected.



Afera's membership of [CheMI](#), the European Platform for Chemicals Using Manufacturing Industries, gives the European adhesive tape value chain a route into chemicals-policy discussions that increasingly affect articles, components and finished products. CheMI was established in 2003 as a platform for downstream users of chemical substances and mixtures in manufacturing industries. Its members are trade associations

representing sectors that use chemicals in B2B and consumer goods. Afera is included in CheMI's June 2026 mandate as representing adhesive tapes, with Afera Regulatory & Sustainability Affairs Manager Pablo Englebienne normally participating and Afera Sustainability Manager Karla Pastor taking part when needed.

A partner with regulatory purpose

CheMI fits Afera's strategic intent to work with associations in adjacent technologies. That strategy gives Afera stronger links with neighbouring value chains and supports co-ordinated engagement on technical and regulatory issues affecting Members. For Afera, CheMI is a practical downstream-user platform for chemicals legislation, especially REACH and CLP. Its renewed June 2026 mandate also covers the interface between REACH/CLP and the Ecodesign for Sustainable Products Regulation (ESPR), including Digital Product Passports (DPPs).

This is relevant because tapes are chemical-enabled articles. Adhesives, carriers, release systems, coatings, primers, process aids and backing materials all sit within supply chains shaped by chemicals legislation. Compliance effects often land downstream, where article producers must answer supplier, customer and regulatory information demands.

A route into CARACAL

CheMI attends CARACAL, the Competent Authorities for REACH and CLP, so that member associations not directly present can be represented. This gives Afera a route into discussions on the implementation of REACH and CLP, including technical interpretations, guidance and emerging policy direction. Afera has used this type of channel before. CheMI membership helped arrange Afera's seat in a relevant partner expert group during ECHA guidance work on substances in articles, where Afera contributed input to reflect the practical position of article producers placing complex adhesive tape constructions on the market.

RAWG priorities show the relevance

The relevance of CheMI is visible across Afera's Regulatory Affairs Working Group (RAWG) agenda. Recent RAWG meetings have tracked REACH revision, CLP developments, n-hexane's SVHC listing, rosin acids classification, PFAS restriction, microplastics, pellet loss, ESPR and DPPs. These files affect the information tape manufacturers receive from suppliers, the data they may need to pass to customers, and the declarations downstream users may require.

The REACH revision is one example. The RAWG noted at its March and June 2026 meetings that the Commission may pursue targeted Annex changes rather than reopen the full REACH Regulation. This could delay wider structural reforms, such as polymer registration, while still allowing more focused technical changes to proceed. Substances in articles are another. The RAWG has followed n-hexane's addition to the SVHC Candidate List, including communication and notification obligations where relevant thresholds are met. It has also tracked rosin acids classification, because rosin-based tackifiers remain important in adhesive formulations, and future classification or labelling changes could affect formulation choices.

From PFAS to product passports

PFAS is a priority where downstream-user representation matters. The RAWG has discussed possible intersections with tapes, including backings, fluorosilicone release coatings, processing aids, lubricants, manufacturing equipment, printing applications, medical adhesive tapes and acrylic foam tape. The issue is not limited to whether a tape contains a regulated substance. It also concerns how information is gathered, how substitution is assessed, how customer requests are answered and how workable transition periods are set.

CheMI gives Afera a broader forum in which to compare these concerns with adjacent industries facing similar pressures. ESPR and DPPs add another layer. Tapes may be components in products that later carry Digital Product Passports. Even where the tape is not the regulated end product, tape-related information on composition, substances of concern, repair, dismantling or environmental performance may need to feed into customer documentation.

Keeping adhesive tapes visible

Afera has already supported CheMI's advocacy work by co-signing the CheMI Manifesto, which called on E.U. legislators to consider downstream-user impacts when regulating chemicals, improve market surveillance, support European competitiveness and foster evidence-based regulation. That position aligns with Afera's regulatory approach: Monitor developments early, assess their impact on the tape value chain, and act with partners where common downstream-user interests are at stake. CheMI strengthens that work by connecting Afera to a wider platform of article-producing industries.

For Members, the value is concrete. CheMI helps Afera keep adhesive tapes visible in chemicals-policy discussions, bring downstream-user realities into wider industry positions and translate regulatory developments into practical intelligence for the European adhesive tape value chain. In a policy environment where REACH, CLP, ESPR, DPPs and substances-of-concern rules increasingly overlap, Afera's membership of CheMI helps ensure that adhesive tapes are represented where upstream chemicals policy becomes downstream industrial reality.

Further information

- [Afera Regulatory Affairs](#)
- [Afera's Technology Partners](#)
- [CheMI, The European Platform for Chemicals Using Manufacturing Industries](#)
