

Tracking regulatory complexity: Outcomes of Afera's Regulatory Affairs Working Group meeting



Afera's Regulatory Affairs Working Group (RAWG) met on 4 December 2025 to review a broad and increasingly complex set of regulatory developments affecting the European adhesive tape industry. From PPWR implementation and design-for-recycling discussions to REACH restrictions, EUDR timing, omnibus packages and emerging policy files, the meeting highlighted the scale of regulatory change facing the sector. Read on for a full review of the discussions, outcomes and what Member Companies should prepare for next.

The European adhesive tape sector continues to operate within a dense and fast-evolving regulatory environment. Afera's RAWG provides Members with a dedicated forum to anticipate, interpret and respond to these developments. The 4 December 2025 meeting, chaired by Sustainability & Regulatory Affairs Manager Pablo Englebienne with Sustainability Project Manager Karla Pastor, reflected Afera's proactive approach to monitoring legislation, shaping regulatory debate and supporting Member Companies in navigating compliance challenges.

Competition law compliance and new Members

The meeting opened with a reminder of the strict need to comply with European competition law. Mr. Englebienne reiterated that he and Ms. Pastor monitor all RAWG meetings to ensure compliance and that Members must avoid discussion of prices, market shares or confidential commercial information.

Several new participants were welcomed to the Working Group. Julia Walman (Bischof+Klein) joined the RAWG, confirming her role in sustainable procurement and packaging materials, including adhesive tapes. Elisabeth Musanganire, Regulatory Manager at Novacel, also attended her first RAWG meeting. Teoman Köksal (A&G Ambalaj) joined RAWG following the integration of Afera's advocacy activities into the RAWG.

Information sharing: Afera website updates

Ms. Pastor presented updates to Afera's Regulatory Affairs section of the website (<https://afera.com/regulatory-affairs/>), which is now systematically updated following each RAWG meeting. Dedicated pages cover key legislative files including [PPWR](#), [EUDR](#), [PVC](#), [Microplastics](#), [CSRD](#),

[CSDDD](#) and the [Green Claims Directive](#), with a “latest developments” section highlighting changes since the previous quarter.

Instead of circulating stand-alone minutes, Afera continues to publish comprehensive Quarterly Regulatory Affairs Updates via *Afera News*, responding to Member feedback requesting accessible, narrative overviews. Ms. Fulton explained that these articles are archived within the Regulatory Affairs section and cross-linked to the relevant regulatory topics. Mr. Englebienne confirmed that this practice will continue, with RAWG participants notified when new updates are published.

The integration of Afera’s former Flagship Sustainability Project (AFSP) Advocacy Workstream (WS3) into RAWG was also confirmed, streamlining regulatory engagement and avoiding duplication. An updated list of RAWG task forces was shared, and Members were invited to indicate areas of interest.

Priority topics



[PPWR](#) – advocacy on release liners

Mr. Englebienne provided an overview of advocacy efforts related to the classification of release liners under the Packaging and Packaging Waste Regulation (EU) 2025/40. Release liners remain a regulatory grey area, as PPWR does not explicitly define their status.

A joint Afera–FINAT initiative, supported by consultancy FleishmanHillard, sought clarification from the European Commission. The advocacy

approach evolved over time, moving from a technical explanation of the role of release liners towards an attempt to argue that they should not be considered packaging. Independent legal assessments were commissioned, producing divergent conclusions.

The consolidated legal view indicates that release liners are likely to be considered packaging, with only limited counter-arguments available. As release liners are removed and disposed of separately after application, they are not considered “integral components” under prevailing legal interpretation. Arguments relating to protection and handling were considered more likely to reinforce a packaging classification.

Mr. Englebienne underlined that exemptions under PPWR are narrowly defined and difficult to extend. No letter has yet been submitted to the Commission, and further discussion is required, including whether labels and tapes should continue to pursue a joint advocacy approach.

PPWR – design for recycling (DfR), paper packaging

Mr. Englebienne outlined progress within CEN TC261/WG3 on design-for-recycling guidelines for paper packaging, which directly affect adhesive tapes used as closures, tear tapes and functional elements. Tapes are currently treated as flexible closures within the draft framework.

Mr. Englebienne and Mr. Seitz are actively involved in these discussions. The second Working Draft consultation closed in October 2025, and comments are now being addressed. The indicative timeline foresees Commission and JRC review in early 2026, finalisation around April 2026 and consultation leading to a technical specification by July 2026.



PVC is proposed to be placed in the red column for paper packaging due to waste-management and incineration concerns. Thresholds for non-paper content were discussed, with indicative ranges of under 10% (green), 10–20% (yellow) and over 20% (red). Mr. Seitz highlighted the importance of experimental evidence, noting that limited test data for adhesive tapes could pose challenges. Concerns were raised about cumulative non-paper content from tapes, labels and coatings approaching critical thresholds.

Afera will continue to monitor developments closely and assess implications for the adhesive tape industry.

PPWR – next steps and compliance

The European Commission’s PPWR Q&A and Notice are now expected in Q1 2026, to be published via the Commission’s packaging policy pages. The date of application remains 12 August 2026.

Initial obligations include restrictions on substances of concern and new information-transfer requirements along the supply chain. Mr. Englebienne noted ongoing uncertainty around declarations of conformity and responsibility allocation and proposed a dedicated RAWG task-force meeting in early 2026 to address these issues.

Microplastics REACH restriction

Mr. Englebienne confirmed that adhesive tapes qualify as articles and are therefore exempt from the REACH microplastics restriction itself. However, record-keeping and notification obligations apply for certain substances and mixtures. Reporting is currently expected to begin in 2027, subject to confirmation. Updated Afera guidance will be finalised and published.

Pellet loss regulation

The group reviewed the newly published pellet loss prevention regulation. It was noted that certain tape manufacturing processes, such as extrusion or film forming, could potentially fall within scope. While coordinating with IVK and FEICA, Mr. Englebienne proposed gathering technical information from Members before seeking legal clarification.

Deforestation Regulation (EUDR)

Mr. Englebienne provided an update on the E.U. Deforestation Regulation (EU) 2023/1115. Council and Parliament positions indicate a likely delay in application, although formal adoption is still pending.

Natural rubber as a raw material remains in scope, while adhesive tapes themselves are not. Paper substrates remain relevant commodities. Afera will prepare decision trees to clarify operator and trader roles for Members.

Green Claims Directive (GCD)

Updates were provided on the Green Claims Directive, with discussions resuming in Council and Parliament. Revised drafts include voluntary verification and exemptions for microenterprises. Trilogues may restart in 2026.

CSRD and CSDDD omnibus package

Negotiations on the CSRD and CSDDD Omnibus Package continue, with scope reductions and implementation delays under discussion. Finalisation may slip into early 2026.



REACH revision

The European Commission's REACH revision proposal received a negative opinion from the Regulatory Scrutiny Board. Re-submission is expected in 2026. Polymer registration remains likely, while the mixture assessment factor may be excluded or significantly limited.

Other topics

In addition to the priority files discussed above, the Working Group reviewed a number of other regulatory developments that remain under active monitoring due to their potential relevance for the adhesive tape value chain.

End-of-Life Vehicles (ELV) Regulation

The proposed revision of the ELV Regulation continues to evolve, with an increased focus on circularity targets, dismantling requirements and improved documentation of materials used in vehicles. Particular attention is being paid to obligations related to the disclosure and removal of adhesives, including their potential inclusion in the digital Circularity Vehicle Passport. While the initial scope focuses on passenger cars and vans, a phased extension to additional vehicle categories is foreseen.

Rosin acids – harmonised classification and labelling (CLH)

The RAWG reviewed the ongoing ECHA process concerning the proposed harmonised classification of several rosin acids commonly used in tackifier systems. Norway has submitted [a proposal to classify these substances as Repr. 1B \(H360D\)](#). Additional studies are currently under review, with a Risk Assessment Committee (RAC) opinion expected in mid-2026. Members were encouraged to consider the substitutability of rosin acids in their applications and to engage where relevant.

PFAS REACH restriction

Updates were provided on the universal PFAS restriction under REACH. While the restriction process remains ongoing, a 60-day consultation is expected following the SEAC opinion, currently anticipated no earlier than spring 2026. Given the breadth of the proposal and its potential implications for fluorinated materials, this file remains under close observation.

Aromatic brominated flame retardants (ABFRs)

Following [a request from the European Commission](#), ECHA has been mandated to prepare a REACH restriction dossier covering non-polymeric additive aromatic brominated flame retardants (ABFRs), alongside organophosphorus flame retardants (OPFRs), due to concerns related to persistence, bioaccumulation, toxicity and widespread use across multiple applications. [ECHA is required to submit the restriction proposal by 11 December 2025](#), and has announced [a dedicated stakeholder webinar on 29 January 2026](#) to present the scope, regulatory approach and next steps of the process.

Silicone monomers

Recent updates relating to silicone monomers were reviewed. While the intention to identify certain



linear siloxanes as SVHCs remains under discussion, [an anticipated SVHC listing for L5 has been dropped](#). Three substances remain under consideration within [the restriction pipeline](#), and further developments will continue to be monitored. See also [latest newsletter of Silicones Europe](#).

Ecodesign for Sustainable Products Regulation (ESPR)

The [ESPR](#) remains in force and under observation, with no major new developments reported at this stage. The RAWG

agreed to continue monitoring future delegated acts and [product prioritisation discussions](#) for potential relevance to adhesive tapes and related applications.

Environmental Omnibus

The European Commission is expected to publish an Environmental Omnibus proposal in December 2025, aimed at simplifying and streamlining environmental legislation. While details are still emerging, areas of interest include reporting obligations, permitting processes and the reduction of administrative burden.

Circular Economy Act

Following the closure of the public consultation, the Circular Economy Act is expected to be proposed in 2026. The initiative aims to harmonise extended producer responsibility schemes, revise end-of-waste criteria and promote a functioning single market for waste. The Working Group noted the importance of tracking how this framework may interact with existing waste and packaging legislation.

Advanced Materials Act

An Advanced Materials Act is planned for 2026, with a focus on innovation, high-performance materials and strategic value chains. While still at an early stage, the initiative may be relevant for advanced adhesive technologies and bio-based material development. [A public consultation on call for evidence was launched on 13 October and will be open until 13 January 2026.](#)

Carbon Border Adjustment Mechanism (CBAM)

Finally, updates were noted on the CBAM, with a Commission proposal expected in the fourth quarter of 2025 to potentially extend its scope to additional chemicals and downstream products. Enforcement of any extended scope would be expected from 2027 onwards.



Next meeting and contact

RAWG meetings for 2026 will be scheduled and calendar invitations circulated in due course. If you would like to join the Regulatory Affairs Working Group, please contact mail@aferra.com.

For more information, visit www.aferra.com.