

## Navigating a tightening policy landscape: Outcomes of Afera's Regulatory Affairs Working Group meeting



Afera's Regulatory Affairs Working Group met on 4 September to tackle the industry's most pressing legislative files. From PPWR advocacy and EUDR compliance to the Green Claims Directive, CSRD/CSDDD and multiple omnibus packages, this session captured the complexity of today's regulatory landscape for the European adhesive tape industry. Read on for a full review of the discussions, outcomes and what

### **Member Companies need to prepare for next.**

The European adhesive tape sector continues to face a dense and evolving regulatory environment. Afera's Regulatory Affairs Working Group (RAWG) provides Members with a critical forum to anticipate, interpret and respond to these developments. The 4 September 2025 meeting, chaired by Sustainability & Regulatory Affairs Manager Pablo Englebienne with Sustainability Project Manager Karla Pastor, reflected Afera's proactive approach: monitoring and shaping legislation, providing technical expertise and ensuring Member Companies remain prepared for 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 emphasised that he and Ms. Pastor monitor all RAWG sessions to ensure compliance and that Members must avoid discussion of prices, market shares or confidential commercial terms.

Two new participants introduced themselves: Maida Indigeno, industrial chemist at Sicad, who joined in March with 15 years of regulatory experience in consultancy and the chemical industry, and Katerina Karabakh, now responsible for regulatory and environmental matters in the quality department at Atlas Tapes.

## Information sharing: Afera website updates

Ms. Pastor showcased the expanded [Regulatory Affairs section of Afera's website](#), which now features structured pages on key legislation including [PPWR](#), [EUDR](#), [PVC](#), [Microplastics](#) and [CSR](#). Each section presents the regulation's relevance, current status, next steps and references.

A "Latest changes" field now allows Members to see the most recent update, and a consolidated "Quarterly Update" page is being developed. Mr. Englebienne asked Members for feedback.



## Priority topics

### [PPWR](#) – advocacy on process films and release liners

Mr. Englebienne confirmed that Afera's advocacy on process films was successful: The European Commission will clarify in its FAQ that such films used during manufacturing are not packaging.

On release liners, uncertainty remains. Some Member States already classify RL as packaging, and the Commission may follow. Afera, FINAT and CELAB, with support from consultancy FleishmanHillard, are preparing a joint position paper. Two drafts have circulated, evolving from a direct advocacy approach to a focus on clarifying supply chain complexity and the technical function of RL. Mondi provided input from a legal assessment, and a schematic of the supply chain was developed. The aim is to finalise the paper next week and submit it before the Commission's FAQ, expected in October.

### [PPWR](#) – design for recycling (DfR)

Afera has produced draft DfR guidelines including decision trees to determine whether tapes are packaging and, if so, their recyclability requirements.

Mr. Englebienne and Karsten Seitz, Afera standardisation consultant, participate actively in CEN TC261/WG3/SG2 discussions. Current debates focus on paper recycling processes: conventional pulp/cardboard, liquid packaging, laminated papers and de-inking processes — the latter potentially relevant for siliconised release liners.

A red/yellow/green classification is being developed: green = recyclable, yellow = acceptable with penalties, red = non-recyclable. Items not covered will require testing with annual updates of the tables foreseen. A new draft will be circulated to CEN participants on 22 September, with a final draft version expected by year-end.

Afera will also prepare specific guidance for Member Companies on PPWR requirements for their own packaging.

### [PVC REACH restriction](#)

At CARACAL's 3–4 July meeting, the Commission presented its Restrictions Roadmap. PVC/additives were mentioned but deprioritised, with no clear timeline.

### [Microplastics REACH restriction](#)

The Commission has published a guidance document, but Afera's Member guidance remains pending. Mr. Englebienne asked for input, but Members had none to add.



### [Deforestation Regulation \(EUDR\)](#)

Concerns persist about how CN codes capture tapes with natural rubber adhesives. Plastic tapes fall under codes such as 3919 10 15 (PP tapes <20 cm, coating of natural/synthetic rubber), 3919 10 12 (PVC/PE) and 3919 90 80 (jumbo rolls >20 cm). Paper tapes are classified under 4811 41 20 (<10 cm) and 4811 41 90 (>10 cm). Current codes do not distinguish between natural and synthetic rubber adhesives.

The Commission [issued guidance on 12 July 2025](#). Meanwhile, stakeholder pressure for simplification or delay is mounting, including a [joint statement from paper & wood industries](#). The enforcement date remains 30 December 2025.

Discussion drew parallels with cosmetics: palm oil as a raw material is in scope, but creams incorporating it are not. Similarly, raw natural rubber is relevant but finished tapes are not. For paper masking tapes, only the paper substrate triggers due diligence to be submitted. Afera will prepare decision trees to guide Members.

## [Green Claims Directive \(GCD\)](#)

The Directive has stalled in trilogues and reverted to Council and Parliament committees. Mr. Englebienne stressed that it is “not dead but slowed.” Publication was originally expected by end 2025, but this may slip.

## [CSRD](#) and [CSDDD](#) omnibus package

The Commission’s [February Omnibus Package I](#) proposes narrowing CSRD scope (>1,000 employees, >€50m turnover, >€25m balance sheet), reducing reporting obligations and delaying CSDDD transposition to July 2027 with staggered entry into force to 2030. Parliament will vote in October.

## Other topics

### **CN codes for tapes**

Members discussed how to classify tapes with heavy adhesive coatings. Practices vary: Some customs offices consider adhesives as plastics based on thickness, while others exclude them (as under Spain’s plastic tax). Questions also arose on whether natural rubber adhesives count as plastics and whether release liner type affects classification. No consensus emerged.

### **Chemical Sector Omnibus**

The Commission’s [8 July proposal](#) simplifies labelling under CLP and amends fertilisers and cosmetics rules.

### **Environmental Omnibus**

A [public consultation](#) is open until 10 September with 32,000 responses (97% from citizens, heavily from Germany). Focus areas: rationalising reporting, harmonising EPR obligations, streamlining processes and digitalisation, and environmental permitting.

### **Rosin acids CLH**

ECHA launched [consultation](#) on 1 September for multiple rosin acid substances used in tackifiers. Proposed harmonised classification: Repro 2. Mr. Englebienne suggested Afera may provide joint feedback.

## Silicone monomers

Silicones Europe confirmed that D4/D5/D6 cyclic siloxanes will not be listed as POPs, avoiding a global ban. REACH restrictions remain. Linear siloxanes are under review: L3/L4 identified as vPvB and candidate SVHCs, L6 under study and an L5 dossier expected February 2026. Ms. Pastor attended the update session on behalf of Afera.

## Circular Economy Act

A [public consultation](#) is open until 6 November. The proposal aims to simplify EPR schemes, revise end-of-waste criteria, promote a single E.U. waste market and set procurement criteria. Mr. Englebienne suggested checking FEICA and DuCC positions for potential alignment.

## Ecodesign for Sustainable Products Regulation (ESPR)

[Regulation \(E.U.\) 2024/1781](#) is in force, supported by a [JRC report](#) on product priorities. Mr. Englebienne proposed internal Afera discussions now that summer is over.



## Next meeting and contact

The next RAWG meeting will take place online on 4 December 2025, 14:00–16:00 CET. If you would like to join the Working Group, please contact [mail@afera.com](mailto:mail@afera.com).

For more information, visit [www.afera.com](http://www.afera.com).