

Afera, FINAT and CELAB Europe submit joint letter on release liner status under the PPWR



On 16 January, Afera submitted a joint letter to the European Commission regarding the regulatory status of release liners under the Packaging and Packaging Waste Regulation (PPWR). The submission follows several months of technical and legal discussions and close co-ordination among Afera, FINAT and CELAB Europe, supported by public affairs consultants and legal advisors.

The letter, addressed to Ms. Maja Desgrées du Loû (E.C., DG Environment), requests a meeting to clarify whether release liners used with self-adhesive labels and adhesive tapes should be classified as “packaging” under PPWR (Regulation (EU) 2025/40).

[View the letter \(Members only\)](#)

Why this clarification matters

Release liners are a technical component used to enable the manufacture, conversion and application of many self-adhesive products. They are typically paper- or film-based substrates engineered with a release coating to prevent premature adhesion. In practice, the liner supports processing and application, is removed at the point of use, and does not remain on or accompany the final product placed on the market.

This function-based approach is also reflected in recent Commission draft guidance work under the PPWR, following advocacy spearheaded by Novacel and supported by Afera and other Members on “process adhesive films”. The Commission notes that adhesive films used in production processes can be packaging or not depending on their function, and that adhesive process films designed to enable or facilitate manufacturing—remaining on semi-finished products during transformation and/or assembly and addressing distinct technical needs—are not packaging under Article 3(1), point (1), of the PPWR. In the Commission’s words, where such films “act as enablers of the manufacturing cycle and address distinct technical needs of such processes, they are not packaging.”

The letter notes that Annex I of the PPWR (the “indicative list” of items in scope of the definition of packaging) does not explicitly mention release liners as either packaging or non-packaging. This absence has contributed to uncertainty across the value chain, and—under the

previous Directive—has already resulted in inconsistent classification among Member States, particularly in relation to EPR fee treatment.

Afera has been tracking this issue as part of its wider PPWR implementation work, alongside related guidance development (including [decision trees](#) to support Members in determining whether specific tape and film products are “packaging” and what obligations follow).

What the letter asks the Commission to do

The core request is procedural and practical: FINAT, Afera and CELAB Europe ask the Commission to engage in a dialogue and clarify, from a legal and regulatory standpoint, whether “release liners incorporated in self-adhesive labels and adhesive tapes used in manufacturing processes” become packaging under the PPWR at any point in their life cycle.

The letter frames this as a question of regulatory clarity and legal certainty for all economic operators involved—producers, users and recyclers—especially given the PPWR’s new requirements on recyclability, recycled content, labelling and reporting.



The technical case set out in the annex

To support the request, the submission includes an annex explaining the role of release liners in the structure and life cycle of self-adhesive products, and why their function differs from packaging in practical terms.

1) Release liners are integral to manufacturing and conversion

The annex describes how, in many cases, the adhesive is applied onto the release liner (rather than directly onto the facestock) because the facestock cannot withstand the moisture, chemistry, or drying/curing temperatures involved. It also explains how liner properties—especially consistent thickness—are essential for high-speed converting steps such as printing, die-cutting and matrix removal, helping converters achieve clean cuts without damaging the liner.

2) Release liners enable precise application in industrial settings

Release liners facilitate automated and manual application by allowing labels and die-cut tape parts to be dispensed precisely and reliably by specialised equipment. The submission emphasises that many liner-backed self-adhesive products are used primarily in commercial and industrial facilities, where used liners can be collected separately and sent to suitable recyclers (with [CELAB Europe’s map of solution providers](#) referenced as an example of existing infrastructure).

3) **Liner specifications are highly application-dependent**

The annex provides examples to illustrate that liners are engineered to meet demanding technical requirements (e.g. healthcare/sterility constraints, cleanroom use, curved-surface bonding, and high-speed automation). It also highlights cases where material constraints may limit the feasibility of recycled content—for example, optical clear adhesive (OCA) tapes in electronics that rely on very high surface-quality PET liners, where the use of post-consumer recycled content is described as not known or feasible.

4) **The supply chain is complex and multi-step**

A schematic supply chain figure shows how release liner manufacture and use spans multiple operators and stages—from raw materials (paper/film) and release-coating suppliers, through coating and self-adhesive product manufacture, conversion (printing, slitting, die-cutting), and finally end-use, where the liner becomes a separately removed process waste stream.



Why packaging classification could create unintended consequences

The letter argues that classifying release liners as packaging would raise technical and operational challenges for the sectors relying on liner-backed self-adhesive products—particularly where

PPWR-linked requirements (such as recyclability criteria or post-consumer recycled content mandates) could compromise liner performance under critical processing and application conditions. The submission suggests that weakening liner integrity could, paradoxically, increase waste and disrupt efficiency in industrial manufacturing environments.

The letter also situates the issue economically, noting that the label and tape sectors together represent over €25 billion per year in direct revenue in Europe, supporting value chains including packaging, logistics, healthcare, vehicles, electronics and construction.

How this fits into Afera's wider PPWR work

Afera's PPWR activity has combined advocacy, guidance development and standards monitoring. On the PPWR file, Afera has been tracking implementation timelines and participating in relevant CEN work on design-for-recycling guidance, while also developing Member-facing tools (including [PPWR decision trees for tapes and films](#)).

On release liners specifically, Afera has been working jointly with FINAT and CELAB Europe to seek clarity on classification, supported by external advocacy and legal input—an approach that

Afera has previously flagged publicly as a priority area under the PPWR due to differing Member State interpretations.

What happens next

The letter requests a meeting; the next step is therefore Commission feedback and potential engagement through a dedicated discussion with DG Environment. Afera will keep Members informed as responses are received and as next steps are defined with FINAT and CELAB Europe.

For more information, view the letter [here](#) (Members only), or visit www.afera.com/regulatory-affairs/ppwr.