

PPWR roles expose a supply-chain grey zone

As PPWR implementation advances, Afera's latest Members-only brief explains why identifying whether a company acts as manufacturer, producer or supplier is now a practical compliance priority for the adhesive tape value chain.



The [Packaging and Packaging Waste Regulation](#) (PPWR) is moving into implementation, and Afera Members are facing a practical question: Who carries which obligation when tapes, adhesive films, liners or packaging components fall within scope?

Afera's latest Members-only brief examines one of the most complex issues discussed at the 18 June 2026 Regulatory Affairs Working Group (RAWG) meeting: the distinction between *manufacturer*, *producer* and *supplier* under the PPWR.

These terms may sound familiar, but the Regulation gives them specific meanings linked to packaging design, conformity assessment, Declarations of Conformity, extended producer responsibility (EPR) obligations, and supply-chain information duties.

For the adhesive tape value chain, the answer depends on the scenario. A company may supply packaging material to a customer, place its own packaged product on the market or trigger EPR obligations in a specific Member State. [Adhesive films](#) add another layer because the same product may be a process film in one use and packaging in another. Customer requests for technical documentation to draft Declarations of Conformity and recyclability data are already increasing, sometimes before role allocation is clear.

The brief explains why PPWR compliance starts with role mapping. Member Companies are encouraged to review packaging and packaging-material flows, align customer-response workflows and identify when they must issue documentation, when they must provide supporting information and where further interpretation is still needed.

Further information

- [Member brief: PPWR roles expose a supply-chain grey zone](#) (Members only)
- [Regulation \(EU\) 2025/40 on packaging and packaging waste](#)
- [Afera PPWR adhesive films decision tree](#)
- [Afera Regulatory Affairs](#)
