

# PPWR clarification brings welcome certainty for industrial process films

*As the PPWR moves closer to application, a new European Commission guidance package has delivered an important clarification for industrial adhesive process films — and a constructive outcome for Afera's advocacy on behalf of the European adhesive tapes value chain.*



Afera has welcomed an important clarification under the Packaging and Packaging Waste Regulation (PPWR), confirming that adhesive process films used to enable or facilitate manufacturing processes, and remaining on semi-finished products until further transformation or assembly, are not considered packaging under Article 3(1). In a [statement issued on 10 April 2026](#), Afera said the clarification

marks a meaningful step towards greater legal certainty for the European adhesive tapes value chain. It brings a more practical and balanced interpretation to a category of products that has long sat in a regulatory grey area.

This matters because not all adhesive films serve a packaging function. Some are used within industrial processes to protect surfaces, support manufacturing or enable transformation before a product reaches its final form. Treating such films automatically as packaging would have created confusion and risked imposing obligations that do not reflect their actual role in production.

The clarification forms part of the European Commission's wider PPWR package published on 30 March 2026, which includes both the Commission guidance document and a set of frequently asked questions. Together, these documents provide additional interpretative support on a number of practical issues arising under the Regulation as companies prepare for its application.

Afera quickly relayed the development to its Regulatory Affairs Working Group. In a 30 March email to RAWG Members, Pablo Englebienne, Afera Regulatory Affairs & Sustainability Manager, informed them of the publication and shared the Commission documents so that Members could review the implications directly. Mr. Englebienne also observed that the published Notice did not appear to differ substantially from the January draft already under review, while the accompanying FAQ appeared to address several additional aspects.

## Why this clarification matters

For the adhesive tapes value chain, the significance is clear. The Commission's latest wording recognises that function must remain central when determining whether an adhesive film falls within the scope of

packaging rules. That is a more workable and realistic approach for products used as enablers of manufacturing rather than as packaging placed around a finished good.

For Afera, this is also the result of steady, technically grounded engagement. As noted in the Association's 10 April statement, the outcome followed constructive dialogue between industry stakeholders and the European Commission, supported by co-ordination within Afera and input from several Member companies, including [Novacel](#), [Polifilm](#) and [Nitto](#).

That collective effort has been important. Where legislation is broad and complex, sector-specific expertise can make a real difference in helping to ensure that the final interpretation is both proportionate and rooted in industrial reality.

For Afera Members, the clarification offers a stronger basis for product classification, regulatory positioning and communication with customers and other stakeholders. It reduces the scope for overbroad interpretation in cases where films are clearly part of a manufacturing process rather than part of a packaging system.

At the same time, the newly published package also shows that not every tape-related question has yet been resolved. As Mr. Englebienne noted in his message to RAWG Members, release liners do not appear to be addressed in the current Commission guidance package, despite earlier indications that this issue would be covered. That underlines an important point: While the clarification on industrial process films is a genuine step forward, further clarity is still needed on other open issues affecting the European adhesive tapes value chain.

This wider concern has also been reflected elsewhere in the packaging debate. As highlighted in Mr. Englebienne's email, EUROOPEN has likewise called for further dialogue and clarity where important PPWR implementation questions remain open. That context reinforces the fact that, while the guidance package is welcome, it is not the end of the interpretative process.

## **What comes next for Members**

Afera is therefore already looking ahead to the next practical step. The Association is planning to issue Members-only guidance and a decision tree to help determine whether an adhesive film is considered packaging under the PPWR. The aim is to translate this clarification into practical tools that companies can use in day-to-day decision-making. High-level clarification is valuable, but businesses also need practical support to assess real product cases consistently and confidently across technical, regulatory and commercial teams.

This latest development does not resolve every PPWR question affecting the adhesive tapes value chain, and further guidance and implementing measures will continue to shape how the Regulation is applied. Even so, from Afera's perspective, this clarification is a positive and welcome development: one that brings the PPWR closer to industrial reality, acknowledges the distinct role of process films in manufacturing, and underlines the value of continued engagement to ensure that future legislation remains workable for the European adhesive tapes industry.

Mr. Englebienne's note to RAWG Members also made clear that Afera would continue reviewing the newly published materials in detail.

## Further information

- [Afera statement, Afera welcomes clarification under PPWR on industrial process films \(10 April 2026\)](#)
- [European Commission, Guidance document on Regulation \(EU\) 2025/40 on packaging and packaging waste \(30 March 2026\)](#)
- [European Commission, FAQ on the Packaging and Packaging Waste Regulation \(PPWR\)](#)
- [Afera Regulatory Affairs webpage on the PPWR](#)
- [EUROPEN statement on remaining PPWR implementation gaps.](#)

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