

# Charting a complex landscape: Insights from Afera's Regulatory Affairs Working Group

The European adhesive tape sector is navigating an increasingly dense and dynamic regulatory environment, requiring vigilance, expertise and collaboration. Afera's Regulatory Affairs Working Group (RAWG) plays a pivotal role in equipping its Members to meet these challenges, as reflected in the key discussions and decisions of its 30 June meeting.



In today's fast-evolving European regulatory environment, companies in the European adhesive tape value chain face increasing complexity and scrutiny. Afera stands at the forefront of helping the industry navigate this landscape — not just by monitoring legislation but by contributing technical expertise, shaping policy discussions and advocating on behalf of its Members. Our RAWG provides a critical forum for this work, ensuring Members stay informed and prepared for regulatory developments that impact their businesses. At the most recent quarterly meeting, chaired by Sustainability & Regulatory Affairs

Manager Pablo Englebienne alongside Sustainability Project Manager Karla Pastor, participants examined key legislative files, shared knowledge and discussed collective actions needed to ensure that adhesive tape products remain compliant, competitive and sustainable in a tightening policy landscape.

## Competition law compliance and new Members

The Meeting opened with a comprehensive briefing on the importance of adhering to E.U. competition law requirements. Afera's proactive and transparent approach reflects its firm commitment to ethical practice and the safeguarding of member companies.

During a tour de table, the RAWG welcomed four new participants, each offering significant expertise. An Van Rompay, from Avery Dennison Belgium, presented a background in toxicology and regulatory affairs, including a PhD in molecular biology and over two decades as a European Registered Toxicologist. Joining from Icap-Sira, Italy, were Miriam Capozzo, Eleonora Forti and Anna Fois, who collectively brought valuable experience in regulatory compliance and industrial knowledge to the working group.

## Information sharing: New regulatory affairs section of Afera website

Ms. Pastor showcased its updated "Regulatory Affairs" section on the Association's website as a key resource for Members. The section presents a well-structured overview of current and forthcoming legislation affecting the adhesive tape industry, including PPWR, EUDR, REACH-related restrictions on PVC and microplastics, the Green Claims Directive, CSRD, and CSDDD. A timeline extends through to 2040, allowing Members to anticipate regulatory developments. The site will also host position papers and reference materials to help Members prepare for legislative changes. Members were encouraged to

provide feedback and informed that a “last updated” field will soon be visible on each page to indicate how current the published information is.

## **Priority topics**

### **PPWR – advocacy on process films**

Mr. Englebienne reported on a 7 May 2025 meeting with European Commission officials, where it was confirmed that films used solely for protection during manufacturing processes do not qualify as packaging under PPWR. This important clarification, though not included in Annex I of the legal text, is expected in an upcoming Commission FAQ. The publication date is not fixed but is anticipated later in 2025.



### **PPWR – release liner advocacy**

Afera, together with FINAT and CELAB, is advancing a joint initiative to clarify the regulatory status of release liners under PPWR. There is significant uncertainty as some Member States classify them as packaging, while others do not. Mondi is providing a legal review and FleishmanHillard is supporting advocacy efforts. A task force meeting is planned for 8 July 2025, and Members were encouraged to volunteer. The initiative’s objective is to secure regulatory clarity even if consensus is not achievable at the E.U. level.

### **PPWR – design for recycling (DfR) guidelines**

Afera is contributing actively to the CEN TC261/WG3/SG2 drafting process on paper packaging design for recycling (DfR) guidelines. Its draft internal guidance includes a decision-making workflow to determine whether tapes are packaging and, if so, their recyclability requirements. The workflow accounts for packaging type (sales, group, transport, e-commerce), whether the tape is a standalone item or integrated component, and the primary material determining the appropriate recycling stream. Examples include carton-sealing tape on cardboard boxes (paper stream) and reclosure tabs on plastic pouches (plastic stream). Finalisation of this guidance is expected later in 2025.

### **PVC REACH restriction**

The Commission has not yet proposed a restriction on PVC or its additives but is considering options. An NGO letter sent on 6 June called for urgent action and a timeline. Afera continues to monitor developments.

### **Microplastics REACH restriction**

Adhesives are generally not in scope, but manufacturers may still face information obligations regarding microplastics in formulations. Official guidance is awaited.

### **Deforestation Regulation (EUDR)**

Benchmarking for country risks was published on 20 May, but uncertainty remains regarding how EUDR applies to tapes, especially those containing natural rubber. Differentiated CN codes for plastic-backed and paper-backed tapes add complexity, and existing codes do not distinguish natural versus synthetic rubber adhesives. Afera is preparing decision trees to help Members determine relevance and compliance obligations.

### **Green Claims Directive**

Political developments in June stalled this directive's progress. MEPs from the EPP requested withdrawal on 18 June; the Commission indicated agreement on 20 June; and trilogues were suspended on 23 June. The file has reverted to committee discussions, and future progress remains uncertain.

### **CSRD and CSDDD omnibus package**

The February omnibus package proposed reducing CSRD scope (companies with >1,000 employees, >€50 million turnover, >€25 million balance sheet) and delaying CSDDD transposition to 26 July 2027, with staggered entry into force from 2028–2030. A vote is scheduled for October.

## **Other topics**

### **Clean industrial deal**

Announced in February 2025, the Clean Industrial Deal seeks to align industrial policy with sustainability goals. A Circular Economy Act is expected by Q4 2026.

### **ESPR**

The Ecodesign for Sustainable Products Regulation (Regulation (EU) 2024/1781) is in force, supported by a JRC report on priority products. A task force will be launched later this year.

### **Chemical industry package**

A REACH revision remains expected by year-end 2025, forming part of the broader Chemical Industry Package. Afera will remain closely engaged through its relationship with FEICA.

### **Chemical sector omnibus**

The Chemical Sector Omnibus proposal, expected on 8 July, will amend several regulations, including CLP, fertilisers and cosmetics. A leaked draft was discussed ahead of the CARACAL meeting on 3–4 July.

## **Industrial emissions directive**

A 12 June workshop reviewed emission limit methodologies. Slides are available to Members on the Afera workspace.

## **Rosin acids CLH**

Norway has proposed harmonised classification for rosin acids, potentially affecting tackifiers used in adhesives. The Pine Chemicals Consortium is actively monitoring this dossier.

## **CN codes for tapes**

Members raised questions about CN codes for adhesive tapes, particularly paper-backed tapes with substantial adhesive coatings. Issues include whether adhesive thickness changes classification from paper (Chapter 48) to plastics (Chapter 39), and whether the nature of the release liner influences classification. Afera will seek clarification from FEICA and collect input from Members with customs experience.



## **Next meetings and contact**

The next RAWG meetings will take place online on 4 September 2025 and 4 December 2025, both from 14:00 to 16:00 CET. If you would like to join the working group, send an email to [mail@aferra.com](mailto:mail@aferra.com).

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