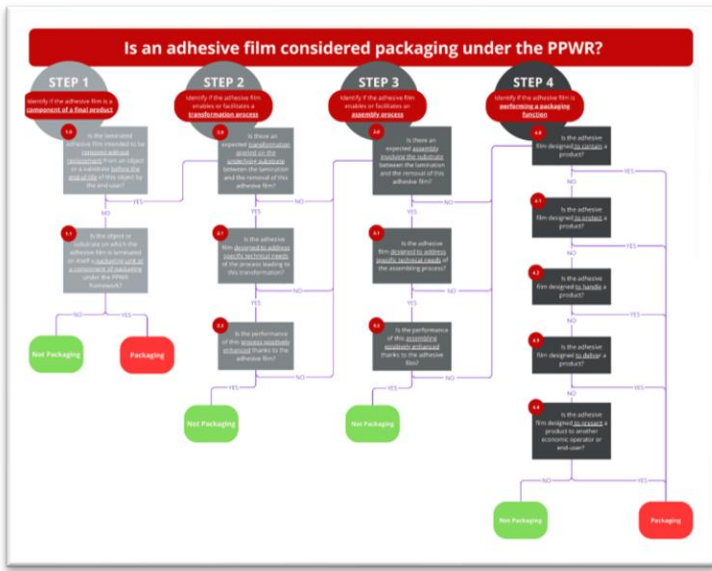


# When does adhesive film count as packaging under the PPWR?

Afera's new decision tree gives adhesive-film companies and their customers a practical way to distinguish process films from packaging under the PPWR.



Afera unveiled its [PPWR Adhesive Films Decision Tree](#) to the wider industry in the [May issue of Afera Insights](#). The public guide was created to answer a difficult but increasingly important question: When does an adhesive film used on a product or substrate become packaging, and when does it remain part of a manufacturing process?

The distinction matters across the European adhesive tape value chain. Classification can affect what compliance information must be supplied, who prepares the packaging Declaration of Conformity and which [PPWR](#) requirements may apply.

## From Commission guidance to a practical test

The decision tree builds on the European Commission's March 2026 guidance on adhesive films used in production processes. The Commission recognised that these films may be packaging or not packaging depending on their function.

A film can fall outside the packaging definition where it enables or facilitates the transformation of raw or intermediate materials into semi-finished or final products, remains in place during the relevant manufacturing stages and addresses distinct technical needs of the process. By contrast, a similar-looking film applied after production solely to protect a completed product during storage or transport may perform a packaging function.

## Four steps to a classification

The decision tree takes users through four main questions. It considers whether the adhesive film

- remains a component of the final product

- enables or facilitates a transformation process
- enables or facilitates an assembly process
- performs a packaging function where none of the previous conditions applies.

Supporting definitions clarify terms including substrate, lamination, removal, transformation, assembly, semi-finished product and final product.

The guide was developed by an Afera task force led by Novacel, with participation from Member Companies including Polifilm, Bischof+Klein and Nitto. The group selected applications for which participants could agree both on the facts and on how the decision-tree questions should be interpreted.

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## Eleven examples show how it works

The first edition contains eleven examples from manufacturing and product-handling contexts. For each application, the guide identifies the substrate, any semi-finished product, the final product and the route through the decision tree.

A mirror-backing film, for example, remains part of the mirror throughout its lifetime and is not packaging. A carry-handle tape attached to the plastic wrapping around grouped bottles remains part of a packaging unit and is therefore treated as packaging.

Other examples show how films used during laser cutting, metal forming, acid etching, decorative-laminate production, thermoforming and printing can qualify as process films. An insulated-glass-unit film is assessed in relation to its function during assembly and installation.

The outcome differs for an adhesive film applied to a completed car during storage and transport. Because no further transformation or assembly takes place and the film protects the finished vehicle, the guide treats it as packaging.

The examples are identified by name so that further applications can be added without restructuring the document. A change in function, application stage or removal point may produce a different result.

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## What the distinction means in practice

A company that manufactures a process film may not hold the information needed to prepare documentation for a packaging application because the film was not designed or supplied for that purpose. Where an adhesive film is used as packaging, however, the supplier may need to provide relevant material information to the actor responsible for the finished packaging.

This does not necessarily make the adhesive-film company the “manufacturer” under the PPWR. The Regulation gives specific meanings to “manufacturer”, “producer” and “supplier”, which do not always correspond to everyday commercial usage.

In a typical case, one company supplies an adhesive film that another uses to package its own product. The film company supplies packaging material, while the company creating and placing the packaged product on the market is generally responsible for the packaging Declaration of Conformity. The precise allocation depends on the supply-chain structure and the roles defined by the Regulation.

The guide is therefore relevant not only to companies that manufacture adhesive films, but also to raw-material suppliers, converters, industrial users and customers requesting PPWR documentation. For regulatory, sustainability, technical, quality and customer-service teams, it provides a shared basis for deciding which information is relevant and when deeper legal or technical assessment is needed.

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## Designed to evolve

The eleven examples are deliberately non-exhaustive. Some applications remain under discussion because the task force does not yet have sufficient information or has not reached agreement on the appropriate outcome.

Afera intends to update the decision tree as further cases are resolved and experience with PPWR implementation develops. The guide is non-binding and does not replace legal or technical assessment, but it gives the European adhesive tape value chain a practical framework for applying the Commission's guidance.

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## Further information

- [Afera PPWR Adhesive Films Decision Tree](#)
- [Afera Regulatory Affairs](#)
- [Afera Regulatory Information \(Members only\)](#)
- [Afera Packaging and Packaging Waste Regulation website section.](#)

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