

TREATMENT OF RELEASE LINERS UNDER THE PPWR

Regulation (EU) 2025/40 on Packaging and Packaging Waste (“**PPWR**”)¹ establishes a harmonised framework governing packaging, including requirements on recyclability, design, and recycled content. Under the PPWR, responsibility for compliance with packaging requirements primarily lies with the manufacturer of the packaged product. In practice, suppliers of packaging materials are required to provide downstream operators with the information necessary to ensure compliance with the Regulation.

This position paper, jointly prepared by FINAT and AFERA, draws on the PPWR and the Commission’s Notice Guidance Document for the PPWR (“**Guidelines**”)² and explains why release liners for self-adhesive products should not be considered packaging within the meaning of the PPWR. The below sections detail two key aspects that underpin this conclusion.

This paper is intended to contribute to a common and operational understanding of release liners among EU policymakers, competent national authorities, and Producer Responsibility Organisations (“**PROs**”) responsible for the implementation of extended producer responsibility (“**EPR**”) systems at national level. Establishing a harmonised approach is essential to preventing divergent national interpretations, which would fragment the internal market and create significant disruptions across business value chains.

1. Release liners are “integral parts” of adhesive products and, as such, are not packaging under Article 3(1) of the PPWR

Article 3(1), point (1)(a) of the PPWR excludes from the definition of packaging items that form an *integral part* of a product. This principle is further elaborated in Recital 13 of the PPWR, which provides that an item should not be considered packaging where it forms an integral part of a product, is necessary to contain, support or preserve that product throughout its lifetime, and where its functionality is *intrinsically linked* to its role as part of that product.

FINAT and AFERA maintain that release liners for self-adhesive products incorporating a release liner satisfy these criteria, given that the adhesive product cannot be marketed, handled, stored or used in its intended form without the liner. The release liner performs a technical function that extends beyond the conventional functions of packaging: it preserves the integrity of the adhesive surface, prevents premature adhesion, and enables the product to be processed and applied as intended. Its functionality is therefore inseparable from that of the adhesive product itself.

This distinction between items that perform an independent technical function and those that merely contain, protect or present a product underpins the European Commission’s approach in the Guidelines. This is illustrated by the treatment of intravenous bags and syringes, which are excluded from the definition of packaging despite performing a containment function. The medicinal product cannot achieve its intended therapeutic purpose independently of the device through which it is administered. The containment function is thus incidental to the device’s primary technical function.

FINAT and AFERA consider that a comparable analytical approach applies to release liners in self-adhesive applications. Their primary purpose is not to contain, protect, handle, deliver or present a product to another economic operator or end user. Rather, they constitute an essential technical component that enables the adhesive product to retain its functionality throughout the manufacturing

¹ [Regulation - EU - 2025/40 - EN - PPWR](#)

² [Commission Notice C/2026/3084 – Guidance document for Regulation \(EU\) 2025/40 on packaging and packaging waste](#)

and application process. On this basis, release liners form an integral part of the product within the meaning of Article 3(1), point (1) of the PPWR and therefore fall outside the definition of packaging.

2. Release liners used in industrial and manufacturing processes fall outside the definition of packaging as they meet the conditions of the Commission's policy-based exemption granted to adhesive films

In addition to the considerations set out above, the treatment of release liners used in industrial and manufacturing processes may be assessed in light of the approach adopted by the Commission in relation to adhesive process films.

The Commission's Guidelines expressly exclude adhesive films used in production processes from the definition of packaging, including where such materials are applied to, and travel with, semi-finished goods across multiple stages of production and in B2B supply chains between separate economic operators.

According to the Guidelines, adhesive films used in production processes are excluded from the definition of packaging where they: (i) are used in production processes of goods; (ii) enable or facilitate the transformation of raw or intermediate materials into semi-finished or final products; (iii) remain on semi-finished products until their transformation and/or assemblage into final products; (iv) act as enablers of the manufacturing cycle; and (v) address distinct technical requirements of such processes.

FINAT and AFERA maintain that release liners used in industrial applications satisfy each of these criteria. They are industrial production inputs integral to manufacturing, coating, conversion, and automated application processes. They remain attached to the adhesive product throughout the production cycle until the point of final application, are removed prior to the product being placed on the market and are managed as industrial waste within controlled production environments. Without release liners, the manufacture, storage, transport, and application of adhesive products in industrial settings would not be technically feasible.

This interpretation is supported *a contrario* by Recital 13 of the PPWR, which brings tea bags within the scope of packaging on the basis that they are disposed of together with product residues because of the risk of contamination of recycling and composting streams. This is not the case of industrial release liners, which are removed before the product reaches the end user and are capable of separate collection and treatment, including recycling within controlled industrial waste streams.³ Their exclusion from the definition of packaging is therefore consistent with the PPWR's objectives of reducing waste stream contamination and improving recyclability. Conversely, classifying release liners as packaging would introduce requirements that would jeopardize their structural and functional integrity, leading to increased industrial waste and directly undermining these environmental objectives.

Given that the Commission has recognised in the Guidelines that a functional interpretation of Article 3(1) of the PPWR supports the exclusion of adhesive process films used in industrial and manufacturing processes, a coherent application of this approach requires that the same conclusion be applied to release liners. Accordingly, release liners used in industrial applications should not be considered packaging and, consequently, are excluded from the scope of obligations under the PPWR including their assessment of conformity as packaging materials and obligations arising under national EPR schemes.

³ See for instance, the CELAB Europe project for the promotion of recycling of release liners in the label industry [CELAB Europe - Towards a Circular Economy for Labels](#), and the page from Afera on [Sustainable Management of Adhesive Tape Release Liners](#)