



## International Release Liner Association

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### **Subject: IRLA Position on PPWD Revision**

IRLA, International Release Liner Association, is fully in accordance with the principles of the new Packaging and Packaging Waste Regulation as it recently became published unofficially. We welcome the protection of the environment and of the human health as an undisputable superior goal.

However, we recognise certain issues with the use of a “negative list of packaging characteristics” as annexed. The present list contains definitions of material properties related to the currently available recycling methods, together with just plain materials without considering ongoing and future developments that will allow recycling of packaging materials comprising such characteristics.

Silicone coated papers are a necessary product used in a very wide range of applications in daily life. This includes carriers for self-adhesive labels, self-adhesive tapes (used in many markets from Automotive to Aerospace, Consumer, Electronics and Medical), Bakery release papers, Personal Care, Composite manufacturing and Construction Industries. The release liners are a small but essential component in a wide range of products and processes.



## International Release Liner Association

Silicone coated papers can be recycled (ref ISRI<sup>1)</sup>), and are already recycled today on an industrial scale. As an industry association we are constantly seeking to further increase the rate of recycling of our release liners.

We therefore disagree with the proposal to include silicone coated papers in the “negative list of packaging characteristics”, because not only can silicone papers actually be recycled today, but in our opinion, it would hinder the entire value chain to develop future (and even better) recycling solutions.

IRLA, the International Release Liner Association, is the organisation gathering and representing the producers of siliconised release papers and films as well as members of the respective supply chain.

<sup>1)</sup> ISRI, Institute of Scrap Recycling Industries (Washington, DC), is an international organisation, that recently announced siliconised papers as recyclable.

<https://www.isri.org/news-publications/news-details/2022/04/19/public-notice-isri-board-approves-changes-to-the-guidelines-for-paper-stock>

A handwritten signature in black ink, appearing to read 'E. Nausch', written over a horizontal line.

Dr. Eckart Nausch (IRLA - Secretary General)

A handwritten signature in black ink, appearing to read 'J. Soding', written over a horizontal line.

Jörg Soding (IRLA - Chairman)

A handwritten signature in black ink, appearing to read 'M. Schuster', written over a horizontal line.

Marko Schuster (IRLA - Vice - Chairman)

Member Companies: Cotek, Gascogne, Itasa, Laufenberg, Mondi Engineered Materials GmbH, Ahlstrom, Dow Chemicals, Sappi Europe, Delfort Group, Heinzl-Pöls / Starkraft