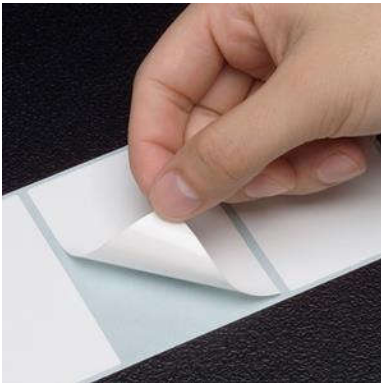




## POSITION PAPER ON RELEASE LINERS AS PACKAGING UNDER THE CURRENT PPWR<sup>1</sup> PROPOSAL – A DETERMINATION YET TO BE MADE

**WHAT ARE SILICONE RELEASE LINERS TECHNICALLY?** Silicone coated Release Liners are integral components of self-adhesive products. The Release Liner performs a number of essential roles in processing self-adhesive materials, such as process aid during adhesive coating, carrying the self-adhesive material during cutting, printing, die-cutting, and transporting before finally ‘releasing’ the self-adhesive material to be applied at its final point of use. The most common applications are for self-adhesive labels and double-sided tapes are where there needs to be a protective liner up until the point of use, but release liners are also used in a wide range of other self-adhesive applications such as Graphics, medical plasters, and not only with adhesives, but e.g. for bakery use, vulcanizing of rubber, butyl mastics, fibre composites, transfer printing, or casting operations.



**WHAT ARE SILICONE RELEASE LINERS IN RESPECT OF THE PPWR?** IRLA members manufacture and supply siliconized rolls of both paper and plastic film for subsequent use as release liners for self-adhesive products including carriers for pressure sensitive adhesives (PSA). The coated rolls ‘as supplied’ to the customers of IRLA members are understood to be **products** in their own right.

Where release liners are used with labels, they can become confused with the packaging onto which labels are often applied. However, the release liner itself is fundamentally a protective provision for the self-adhesive side of the label and is discarded at the point of label application. It can therefore

be considered as waste from that point on or, where the label application process is mechanized in industrial or professional settings, it can be considered as a production residue.

In their wider applications in the industrial sector, release liners primarily function as a process aid. They do not display the primary characteristics of packaging, such as containment or presentation of goods. For these reasons, IRLA considers that release liners should be assessed as non-packaging materials.

However, because there continues to be uncertainty about this status IRLA asks for clarity in the text of PPWR and its Annexes to make sure that release liners, especially those used in industrial settings, are understood not to be packaging materials.

### FINAL REMARKS ON RELEASE LINER RECYCLING

IRLA recognizes the importance of the European Union’s Circular Economy Action Plan and the role that its members and their customers will play in facilitating schemes and related recovery pathways to maximize the recycling rates of siliconized sheets. As ISRI<sup>2</sup> has already recognized, these products are inherently recyclable when segregated in industrial settings and this is the model anticipated to represent the bulk of future recycling in the sector. However, the industry needs to understand the framework under which its performance will be measured within the EU and the key criteria on which to focus. It is IRLA’s understanding

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<sup>1</sup> PPWR - Packaging & Packaging Waste Regulation – Commission Proposal

<sup>2</sup> ISRI - Institute of Scrap Recycling Industries

that the provisions of the PPWR are aimed primarily at packaging targeted at the consumer, thereby making its approach inappropriate for release liners as defined herein, whether theoretically considered packaging in some applications or not. Since more than 80% of the products of IRLA members are used in industrial and professional settings, a segregated recycling approach, as identified by ISRI, is the more logical option. The other point of importance to note is that self-adhesive surfaces avoid the widespread use of liquid adhesives, with the waste and potential pollution resulting from that option. Since a 'zero pollution environment' is a central goal of the European Green Deal, other European legislation should be sure to avoid jeopardizing that objective by undermining a fundamentally cleaner technology.

IRLA, the International Release Liner Association, was established in 2009. IRLA is the organisation gathering and representing the producers of siliconized release papers and films as well as members of the respective supply chain. For further information please see: <https://irla.info/>

IRLA – April 2023