




RIP 3.8 and Adhesive Tapes


Definition Clarification & Categorization Proposal

What is an article ?




An object which during production is given a special shape, surface or design which determines its function to a greater degree than its chemical composition.

The elements of the article definition


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- The **function** of an object is determined by the purpose of its use ("Why is the object used?")
 - E.g. : function of a pen is to write, of a battery is to provide energy.
 - The **shape** of an object is its two- or three-dimensional form (depth, width and height).
 - **Surface** means the outmost layer of the object.
 - **Design** means the arrangement of the 'elements of design' in such a way as to best accomplish a particular purpose.
 - E.g. : The design of a textile may be determined by the twist of fibres in the yarn, the weave of threads in a fabric and the treatment of the surface of the textile.

An object is an **article** when the shape, surface and design are more important for the normal use than its chemical composition.


Article or Preparation

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- Tapes can be articles or preparations.
 - It depends on the presence of the carrier material as backing or internal reinforcement.
 - Three cases can be distinguished
 - Adhesive tapes that delivers substance / preparation onto a surface
 - Adhesive tapes that does not deliver substances / preparations onto a surface
 - Adhesive tapes that does not deliver substances / preparations onto a surface but releases substances


The Carrier

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- The carrier material (backing or the internal reinforcement) gives the tape a specific surface and design and provides the function of ‘keeping the adhering items together’ and/or to retain its specific surface shape and design.
 - Without the carrier material (backing or the internal reinforcement), there would be no ‘direction’ in the adhering material and the tape would not retain its shape and design.


Definition of Terms

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- **Backing:** Flexible material like for example fabric, foil or paper which can be coated with a pressure sensitive adhesive.
 - **Double coated or double sided tape:** Backing which is coated on both sides with pressure sensitive adhesive.
 - **Reinforcement:** a material which strengthens the backing and/or the adhesive.
 - **Release liner:** a removable material which protects the adhesive face or faces.
 - **Substrate:** a surface or material to which the tape is applied.
 - **Transfer tape:** an adhesive tape having two pressure sensitive surfaces without the need of a carrier and with a release liner separating the adhesive surfaces. The adhesive layer can contain reinforcing materials.

Definition of Reinforcement

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- EN 12481
 - A material which strengthens the backing and/or the adhesive.
 - Understanding of AFERA REACH expert group
 - A material which strengthens the backing and/or the adhesive e.g. fibres, fillers, glass bubbles or a cross-linked polymeric network.

Definition Amendment

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- **Transfer tape:** an adhesive tape having two pressure sensitive surfaces without the need of a carrier and with a release liner separating the adhesive surfaces. The adhesive layer can contain reinforcing materials.
(AFERA Comment: e.g. fibres, fillers, glass bubbles or a cross-linked polymeric network.)
 - Recommendation: Publication of RIP 3.8 Adhesive Tape page with AFERA comment on AFERA Webpage.

Alignment of Definition & Tapes

	Adhesive Tape delivering preparation onto surface	Adhesive Tape not delivering preparation onto surface	Adhesive Tape not delivering preparation onto surface but release of substance.
Type of object	Special carrier material containing substances / preparations. The carrier material serves only as release liner.	Article with adhesive layer and with a backing or internal reinforcement as an integral part.	Adhesive tape with adhesive layer as integral part and release of substances /preparations as secondary function.
Consequence regarding Article 7(1)	Substances in the adhesive layer may need to be registered under Art. 6.	No registration requirements	The fragrances (or released substances) may need to be registered under Art. 7(1)
Examples	Thermally activated tape & bonding film, adhesive mastics, wax tape for skis and transfer tape without reinforcement.	Tapes with adhesive layers on one or both sides of a backing material and transfer tapes with internal reinforcement.	Children's tape with fruit odour, decorative tapes with insecticides.
Adhesive Tape Types			



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Adhesive Tape Types	Structural Bonding Tapes, Mastics e.g. preformed sealants, putties, ATT w/o reinforcement, Screen-printable adhesives	SCT, DCT, ATT with reinforcement, Acrylic/PE or other foam tapes.	



Open Topics

Tape Categorisation to Article or Preparation?

- **Post Expansion Adhesive Sheet:** Tape that is heat activated to foam multiple times their initial size.
=> Backing with PSA adhesive, Backing will foam
=> More like a preparation
- **Heat-shrinkable Tape:** Tape in sleeve form heat-shrink to cylindrical surfaces.
=> More like an article
- **Other Tapes?**