



PAPER AND ALLIED MERCHANTS ASSOCIATION

COIMBATORE

Regd. No. : 196/1995

(Affiliated to Federation of Paper Traders' Association of India, Mumbai)

E-mail : pamacoimbatore@gmail.com



LALCHAND JAIN
President

R. RAVI
Secretary

C. VIJAYAKUMAR
Treasurer

Shri Ramesh Kishore,
Advisor (F&FA),
TRAI

Respected Sir,

Sub: Amendment of TRAI (Telecom Regulatory Authority of India)
Sending Printed Bills to its Consumers

We are glad to introduce ourselves as Federation of Paper Traders' Associations of India representing Paper Distributors spread throughout the country.

PAPER MANUFACTURING NOT AT ALL ANTI-ENVIRONMENTAL

We have been vehemently raising our voice condemning the widespread myth that Paper Manufacturing is damaging the environment as several trees are cut from out of the forests and thus causing undue damage to environment. In the following paras we have ample explanations to prove our point.

The above argument does not hold ground as Paper is manufactured with the following major inputs

1. Imported Pulp
2. Recycled waste paper
3. Agricultural residue such as bagasse, rice straw.
4. Paper making in India is primarily agro-based.
5. From wood pulp which is made from out of the self-grown trees by Paper mills. Forests are not at all touched upon here.

LITERACY: Unlike developed countries the literacy rate in India still remains low and hence many consumers will not be using electronic media – e mail to view their bills. Even tho usage of Smartphone is gaining momentum of late but still many will not be knowing as to how to download bills from smartphones.

India is still not fully geared to go in for Paperless medium as most of the consumers are either not educated nor they are mentally prepared for that.

Correspondence Address : C/o. Ravi Papers, Sri Lakshmi Towers, 52, Raja Street, 1st Floor, Coimbatore - 641 001.
Phone : 0422 4362065, Mobile : 0 94431 56063, E-mail : ravipaperstirupur@gmail.com

Regd. Office : M.L. Lund Complex, Illrd Floor, 116, V.H. Road, Coimbatore - 641 001.



PAPER AND ALLIED MERCHANTS ASSOCIATION

COIMBATORE



Regd. No. : 196/1995

(Affiliated to Federation of Paper Traders' Association of India, Mumbai)

E-mail : pamacoimbatore@gmail.com

LALCHAND JAIN
President

R. RAVI
Secretary

C. VIJAYAKUMAR
Treasurer

Moreover, hard copy of the bill will make it easier for consumers to make payments promptly as bills sent on electronic media are likely to get missed out leading to disconnections.

The reason for going Paperless on the misguided argument that Paper is manufactured by only cutting trees is not only incorrect but as also misleading the masses.

Here we put forward further arguments in our support.

- a. There is more to digital than meets the eye. While paper is all around us and piles up in plain sight, the energy consumed in the manufacture of digital products, energy needed to power them and the toxic e-waste associated with their end-of-life, are largely out of sight and out of mind. In order for consumers to make informed and responsible choices it is important to be critical of claims that digital is greener than paper correspondence.
- b. People often compare the entire footprint of paper with only the energy it takes to send or receive digital communication. However, they forget about the data centres, networks and the resources (like nonrenewable metals and fossil fuels) it takes to complete the exchange.
- c. Storing emails and attachments on a server may be convenient, but it takes an environmental toll. The longer the email is retained, the greater its impact on the climate.
- d. Approximately 70% of the paper produced in India is from waste / recycled paper or agricultural residue as the primary raw material which contributes towards protecting the environment.
- e. **While the balance 30% is produced using pulp wood, we would like to state that unlike in some parts of the world, Paper Industry in India is not a forest based industry but an agro/ farm forestry based industry engaging approximately 5 lakh farmers from whom more than 90% of the industry's wood requirement is sourced. Farmers grow trees on their lands as any other crop and sell their harvest to the Paper Mills. Majority of the wood is grown in backward areas and marginal land which is potentially unfit for cultivation.**
- f. Growing and harvesting of these planted trees, which are called "Trees Outside Forest" (TOF), has generated substantial employment and increased income of the farmers in rural India.
- g. The balance 10% is sourced from wood grown by State Forest Development Corporations for commercial purposes on revenue land (i.e. non-forest).

Correspondence Address : C/o. Ravi Papers, Sri Lakshmi Towers, 52, Raja Street, 1st Floor, Coimbatore - 641 001.

Phone : 0422 4362065, Mobile : 0 94431 56063, E-mail : ravipaperstirupur@gmail.com

Regd. Office : M.L. Lund Complex, 111rd Floor, 116, V.H. Road, Coimbatore - 641 001.



PAPER AND ALLIED MERCHANTS ASSOCIATION

COIMBATORE



Regd. No.: 196/1995

(Affiliated to Federation of Paper Traders' Association of India, Mumbai)

E-mail : pamacoimbatore@gmail.com

LALCHAND JAIN
President

R. RAVI
Secretary

C. VIJAYAKUMAR
Treasurer

- h. Intensive efforts by the Paper Mills over the last several years have cumulatively brought about 900,000 hectares under plantation and 125,000 hectares are covered under agro / farm forestry on annual basis.
- i. Growing trees by Paper Industry is leading to absorption of carbon dioxide and helping the cause of mitigating climate change. What is significant to note is that young trees grown by the Paper Industry absorb more carbon dioxide than the aged ones. These working or managed forests are very useful for the environment, and Paper Industry has demonstrated potential to enlarge the country's green cover.
- j. Farm forestry model has enabled farmers to increase their earnings by utilising unproductive land. In fact, to meet the dream of the Hon'ble Prime Minister of doubling farmers' income, farm forestry model is one of the key tools to be pursued not only by the industry but also by the Government.
- k. It may kindly be recalled that by virtue of the farm forestry model and greater focus on plantation activities by India's Paper Industry, green cover of the country has improved, and hence it is incorrect to say that usage of more paper leads to cutting down of forests.
- l. Paper Industry has spent approximately INR 25,000 crore in the last 5-7 years in upgrading its technology and increasing the capacity to meet the domestic demand. This has led to significant reduction in consumption of natural resources, particularly energy and water. A large part of energy required for Paper Mills is generated by using renewable energy sources, i.e. bio-mass, resulting in reduced fossil fuel consumption and lower carbon emission.
- m. Paper industry has been closely associated with the national objectives set-up by the Government in areas such as Greening India, Rural Employment and uses of sustainable resources besides meeting paper needs of the Indian consumers. Paper is much more environment friendly and better packaging material than alternates like plastic.
- n. In fact, India's Paper Industry has been pleading for many years at various levels of the Government to permit plantation on degraded forest land with multiple objectives i.e. (i) Greening India, it may increase green cover by 1%, (ii) employment to rural / tribal people, potential employment of over 10 lakh people, (iii) raw material to Paper Industry at competitive rates, and (iv) bring non-productive asset (degraded forest land) into productive use with potential for economic development in rural areas of over INR 1 lakh crore in 20 years.

Correspondence Address : C/o. Ravi Papers, Sri Lakshmi Towers, 52, Raja Street, 1st Floor, Coimbatore - 641 001.
Phone : 0422 4362065, Mobile : 0 94431 56063, E-mail : ravipaperstirupur@gmail.com

Regd. Office : M.L. Lund Complex, IIIrd Floor, 116, V.H. Road, Coimbatore - 641 001.



PAPER AND ALLIED MERCHANTS ASSOCIATION COIMBATORE



Regd. No. : 196/1995

(Affiliated to Federation of Paper Traders' Association of India, Mumbai)

E-mail : pamacoimbatore@gmail.com

LALCHAND JAIN
President

R. RAVI
Secretary

C. VIJAYAKUMAR
Treasurer

- o. From the last so many years, we have been pursuing with the Ministry of Environment, Forests & Climate Change for plantation on degraded forest land which will result in further greening of the country as well as employment generation and availability of raw material to the industry. But there has been no major head-way in this matter.
- p. Major issue of damage to the environment by e-waste and the other effects of digitalization are always undermined and Paper Industry, which is greening the country, has been suffering because of the negative publicity i.e. "usage of paper leading to cutting of forests" by not only Government agencies, but also by other corporates who have vested interests.
- q. Statistics given in the consultation paper itself shows very low smartphone penetration in India still very low until as recently as 2016
- r. The fact that existing subscribers have still not voluntarily opted for e-bill after having been given an option as mentioned in the consultation paper proves the preference of the subscribers.

To summarize, Paper is bio-degradable, renewable, recyclable and sustainable made from planted trees. Growing and harvesting trees provides jobs to lakhs of people, especially in rural areas, working forests support the environment, providing clean air, clean water through increased rainfall, wildlife habitat and carbon storage.

Considering our above stated facts, we feel that usage of Paper may be brought back.

Thanking you
Yours truly,

For Paper and Allied Merchants Association


Authorised Signatory

Correspondence Address : C/o. Ravi Papers, Sri Lakshmi Towers, 52, Raja Street, 1st Floor, Coimbatore - 641 001.
Phone : 0422 4362065, Mobile : 0 94431 56063, E-mail : ravipaperstirupur@gmail.com

Regd. Office : M.L. Lund Complex, Illrd Floor, 116, V.H. Road, Coimbatore - 641 001.