

IPMA/16.1/2018  
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Telecom Regulatory Authority of India

Mahanagar Doorsanchar Bhawan (next to Zakir Hussain College)

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Dear Sir,

**Subject: TRAI Consultation Paper on ‘Review of extant provision for sending the printed bills to consumers of landline and post paid mobile subscribers’ – Comments by IPMA**

Indian Paper Manufacturers Association (IPMA) is the apex and national level body which represents the interests and development of Pulp & Paper Industry in the country. IPMA membership comprises of large integrated Paper Mills from private and public sector with a product mix of all varieties of paper (Writing, Printing, Packaging, Paperboard, Tissue, Specialty, and Newsprint) located in all the regions of the country and using conventional fibre such as wood & bamboo and also unconventional raw materials like bagasse, recycled paper, etc.

Paragraph 2.1 of the TRAI Consultation Paper on ‘Review of extant provision for sending the printed bills to consumers of landline and post paid mobile subscribers’ states that telecom service providers and their associations have represented:

*“Environmental concerns relating to cutting of trees for papers used in printing of bills and changing mobile usage scenario in the context of massive surge in data*

*usage on smart phone were put forth to bolster their demand, as the main rationale to this demand.”*

The argument put forth regarding environmental concerns relating to cutting of trees for paper used in printing of bills is completely fallacious.

While there may be other reasons to move towards digitisation in any field or organisation, it should not be linked to felling of trees and environment protection. In this context, we would like to highlight the following for perusal:

1. Approximately 75% 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.
2. While the balance 25% 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.
3. 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.
4. The balance 10% is sourced from wood grown by State Forest Development Corporations for commercial purposes on revenue land (i.e. non-forest).
5. 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 an annual basis.

6. 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.
7. Farm forestry model has enabled farmers to increase their earnings by utilising unproductive land. In fact, to meet the national endeavour 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.
8. 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.
9. 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.
10. Major issue of damage to the environment by e-waste and the other effects of digitalisation 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.

**To summarise, 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.**

We hope the above will receive TRAI's serious consideration.

Thanking you,

Yours sincerely,

Rohit Pandit

Secretary General

**Indian Paper Manufacturers Association (IPMA)**