

Shri Kapil Mishra ji,
Hon'ble Minister,
Ministry of Law and Justice,
Government of Delhi

Subject: Need to prevent the massive deforestation for manufacturing of paper bags

Hon'ble Minister,

Greeting from Retailers Association of India!

It is my pleasure to write on behalf of RAI.

Retailers Association of India (RAI) is the unified voice of Indian retailers, working with all the stakeholders for creating the right environment for the growth of the modern retail industry in India. RAI is the body that encourages, develops, facilitates and supports retailers to become modern and adopt best practices that will delight customers.

RAI is the representative body of Retailers in India having over 900 member establishments including large and small retailers in the country and represents over 98000 stores in India. RAI has a three charter aim of Retail Development, Facilitation and Propagation.

We have prepared this representation to throw light on the repercussions of using paper bags towards the environment and the threats it poses to the natural resources.

RAI had ,earlier represented to Government of India to adopt Polluter Pays Principle (PPP) for Plastic carry bags to encourage prudent use of plastic carry bags and save the environment. The Polluter Pays Principle (PPP) is a widely used principle and implies that the cost incurred from any form of pollution should be the responsibility of the polluter in order to ensure that the environment is protected for present and future generations. The PPP is widely acknowledged as a general principle of International Environmental Law and is frequently mentioned in Multilateral Environmental Agreements.

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Shoppers Stop Ltd.

Kishore Biyani,
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Shashwat Goenka,
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The Ministry of Environment and Forests, accordingly, has issued a notification dated 4th February 2011 called the Plastic Waste (Management and Handling) Rules 2011. This notification is aimed at controlling the indiscriminate use of plastic and it was mandated that no carry bags shall be made available free of cost by retailers to consumers.

Under this notification various state prescribed charges for plastic bags to ensure its prudent use. There is a complete ban on plastic in the Delhi.

With a similar concern, we, at RAI believe that Paper Bags also relay an immense impact on the environment in terms of global warming, energy and water consumption, and waste generation. These factors lead to paper bags impacting the environment in a similar manner as plastic bags and hence need to be treated similarly. There is strong need to prevent the massive deforestation for manufacturing of paper bags as the compound annual growth rate of the Indian paper industry is growing at 11.7% as of 2014. Also, a paper bag in a landfill takes hundreds of years to degrade, similar to plastic bags in this case.

The following table shows the comparison between plastic and paper bags in India with respect to recycling, reusing and sending them to landfills to be disposed:

Table: Disposal option according to existing possibilities

Treatment	Plastic bags	Paper bags
Recycle	18%	25%
Reuse	55%	28%
Sent to landfill	27%	47%

The table above shows the pattern for treatment of paper and plastic bags in India according to existing possibilities. We can infer from the table that the

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reuse in case of paper bags is almost half when compared to plastic bags, this happens due lower strength of paper bags when compared with plastic bags. On the other hand the amount of paper bags sent to landfills is fairly high when compared to plastic bags, which shows a lot of waste generation when paper bags are used.

Apart from the factors mentioned above, there are other environmental hazards present when paper bags are used. Which range from rise in energy consumption to increase in GHGs (Green House Gasses). Some of the environmental concerns associated with the usage of paper bags are listed as follows:

- Paper bags are largely manufactured from newly cut trees which leads to massive deforestation as the recycling process in India still only contributes to 1/4th of the total share of paper bags production.
- Making a paper bag consumes approximately four times more energy than other carry bag options, showing increased fuel consumption.
- Paper production emits air pollution, around 70 percent more than plastic bag production and in terms of greenhouse gasses, paper bags are reported to be emitting 80 percent more GHGs than its plastic counterpart.
- Life cycle assessments have shown that manufacture of paper bags has a heavier environmental impact than its alternatives.

Therefore, it has been observed that the environmental repercussions of using paper bags are also high and thus, the mandate for retailers to charge for carry bags should also include paper bags. The charge levied on paper bags will also help in spreading awareness among consumers regarding the environmental threats posed by the usage of paper bags and will further promote the reuse of these bags.

The state may by circular determine the minimum price for paper bags depending upon their quality and size which covers their material and waste management cost in order to encourage their re-use so as to minimize its consumption.

Customers will only be charged the material cost of bags. They will also be given an option of bringing their own carry bags or reuse the bags provided

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earlier. This practice is aimed at reducing the environmental impacts of using carry bags and also promoting recycling and reusing of the same.

The member retailers of RAI across Delhi will be complying with these guidelines for charging for paper bags and will be monitoring the consumption and reuse of the paper bags to record the customer response in this regard for assistance in future assessments. This practice will also provide a sufficient insight in terms of consumer awareness and reuse patterns providing appropriate information for future steps to be taken.

We request you to kindly consider our representation and issue a favorable notification in this regard.

We believe such a move would surely bear fruitful results in both, supporting the industry as well as taking forth the objectives of the Government.

Looking forward for your kind response.

Warm Regards,

For and on behalf of Retailers Association of India

Authorised Signatory

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