

## TEMPLATE FOR SENDING COMMENTS ON BIS DOCUMENTS

Date:	25/04/2021	Document No.:	CHD 15 (17017) C	Title of the Document:	WOOD PULP SPECIFICATION
Name of the Commentator/ Organization:	BISWARANJAN DASH, DGM (Technical services) JK Paper Ltd, 4 -BSZ Marg, New Delhi 110002			Abbreviation of the Commentator/Organization:	J K Paper Ltd

(Comments on each clause/subclause/table/fig, etc be started on a fresh box. Information in column 5 should include reasons for the comments/suggestions for modified wordings of the clauses when the existing text/provision is found not acceptable. Adherence to this format facilitates Secretariat's work)

Abbreviation of the Commentator/Organization	Clause/ Subclause No.  (e.g. 3.1)	Paragraph No. / Figure No. / Table No.  (e.g. Table 1)	Type of Comment <sup>1)</sup>	Comments/Suggestions along with Justification for the Proposed Change	Proposed Change/Modified Wordings
(1)	(2)	(3)	(4)	(5)	(6)
B. DASH , JKPL	Wood Pulp Specifications	Entire Standard	Technical	The wood pulp specification standard nomenclature	Entire standard Needs through review before publishing and should be in line with pulp manufacturers/ users and importer specifications.  This is not covering unbleached / mechanical/ thermo mechanical / CTMP / BCTMP pulp thus the nomenclature should be : " PULP Specification – Dissolving, Semi bleached, Bleached chemical wood pulp".
B. DASH , JKPL	4.2	Table 2 / Table 3	Technical	Fibre length, mm ( Min) . Fibre length cannot be minimum as small fragments will also be present. It should be average.	Fibre length – Average
B. DASH , JKPL	4.2	Table 2 / Table 3	Technical	Tracheid and ray cells - Irrelevant.	May be deleted from the table 2 and 3
B. DASH , JKPL	4.2	Table 2 / Table 3	Technical	Ash content 0,5 % max as it is dependent on the wood variant and geographical factor. No method is used to remove ash in the pulp making process for paper/ board grades. Some of the tropical plants found having higher ash %.	Ash content should be 0.5 % max for coniferous and 0.8 % max for non-coniferous ( Deciduous).
B. DASH , JKPL	4.2	Table 2 / Table 3	Technical	Kappa number for bleached pulp ( Irrelevant)	Kappa number cannot be determined for bleachability of pulp thus useful for unbleached/ semi bleached pulp , not for bleached pulp

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B. DASH , JKPL	4.2	Table 2 / Table 3	Technical	R value may be relevant for dissolving grade but not for Paper / Board grade. No Pulp/ Paper manufacturer, seller, importer uses this parameter for determining pulp quality.	R – 10, R -18 need to be dropped from the table 2 and Table 3 as it is irrelevant to the use, this should not be considered as required parameter.  However, this may be taken as an additional parameter to be tested as per standards IS 6213 – Part 19 ( 1985) in separate table
B. DASH , JKPL	4.2	Table 2 / Table 3	Technical	No Paper industry manufacturing/ purchasing, selling pulp in India tests test such extensive alkali solubility	Chemical Pulp for paper and Board uses only 1% NaOH solubility as per standard IS 6213 – Part 5.
B. DASH , JKPL	4.2	Table 2 / Table 3	Technical	Brightness 60 / 80 min for deciduous and 75 / 90 min for coniferous	Proposed Brightness 65 / 82 min for deciduous
B. DASH , JKPL	4.2	Table 2 / Table 3	Technical	EXTRACTIVES – addition of Alcohol – Benzene extractives in place of DCM extractives	Standard needs review for addition of A- B extractives also for the pulp intended for paper. Test method. Tapp T -204
B. DASH , JKPL	4.2	Table 2 / Table 3	Technical	Normally CED ( Cupriethylene Diamine ) Viscosity is measured in all pulp grades intended for paper in India as per IS 6213 – Part 4 and ISO 5351 - 2010	This range seems to be of Cupraammonium method normally used for dissolving grades as per the reading. Range as per CED viscosity need to be reviewed and confirmed.
B. DASH , JKPL	4.2	Table 2 / Table 3	Technical	Fibre classification - pulp manufactured cannot be in accordance with the range and higher fibre length is always better	Range should be revised to the value minimum.
B. DASH , JKPL	4.2	Table 2 / Table 3	Technical	Freeness of Pulp CSF	Method of testing should be defined – ISO 5267. / Tappi T 221

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					In India most of the industries use degree SR hence need to be considered
B. DASH , JKPL	5,1	Table 2 / Table 3	Technical	Packing standard	Packing should be clearly defined – Sheets/ bale packed and strapped with iron wire. Pulp can also be supplied in roll or as agreed between supplier and purchaser
B. DASH , JKPL	5.2	Table 2 / Table 3	Technical	Moisture content	Moisture content being important parameter should be mentioned in the test report provided with the product.
B. DASH , JKPL	5.2	Table 2 / Table 3	Technical	Hazardous chemicals and additives	Antifungal/ antibacterial chemical if any added for preservation during transportation should be mentioned in the test report / MSDS sheets provided.
B. DASH , JKPL	5.2	Table 2 / Table 3	Technical	Environmental concern and protection	To protect environmental , method of bleaching such as ECF / TCF bleaching need to be mentioned in the invoice/ product
B. DASH , JKPL	5.2	Table 2 / Table 3	Technical	Environmental concern and protection	Type of wood used in pulp / Source such as captive plantation, farm forestry / FSC may be mentioned

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