



**Comments of James Anderson, Esq.
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**Delivered to the United States Department of Agriculture
Animal and Plant Health Inspection Service**

Docket No. APHIS–2009–0066

**Wood Packaging Material Used in Domestic Commerce;
Pest Mitigation Relating to Firewood Movement**

**September 15, 2009
Houston, Texas**

Good morning. Thank you for the opportunity to appear before you today and provide comments on the viability of plastic as an alternative to wood packaging materials.

My name is Jim Anderson and I am the General Counsel of Intelligent Global Pooling Systems, or iGPS Company. iGPS operates the world's first pallet rental service offering all-plastic pallets with embedded radio frequency identification (RFID) tags. iGPS is headquartered in Orlando, FL and has offices in Dallas, TX.

We at iGPS believe that substituting plastic pallets for wood pallets wherever feasible would maximize protection to U.S. forests against the spread of invasive pests and deforestation, as well as maximize protection to the environment and the U.S. food supply.

Wood pallets are an environmentally destructive, outmoded shipping and storage system whose value has been outstripped by advances in plastic pallet technology. Consider these important facts:

- Plastic pallets are the most environmentally sustainable pallets in use today. They beat wood pallets on all environmental criteria including ozone depletion and global warming.
- Wood pallets are a major factor in deforestation. Nearly 40% of all hard wood harvested in the U.S. is for pallets. Of these, about two-thirds are limited use, one-way pallets.
- Each year, wood pallets use 7.6 billion board feet of lumber, enough trees to cover an area 10 times the size of Manhattan.

- Over the past 150 years, deforestation has contributed an estimated 30% of the atmospheric build-up of CO₂, a major greenhouse gas.
- Plastic pallets are a long life asset – approximately 15 years. Wood pallets, on the other hand, have a 3 year life and that's assuming they are regularly repaired and renewed – which requires the use of additional wood or the cannibalization of other pallets.
- Plastic pallets are 100 percent recyclable – they are ground and reused at the end of their life, whereas wood pallets present a major waste problem.
- Indeed, wood pallets amount to about 20 percent of all landfilled wood waste. The decay this waste produces includes, among other things, methane, which is a significantly more damaging greenhouse gas than even CO₂.
- Should an iGPS pallet become damaged, it will simply be remolded into a new one, thus eliminating the wood pallet "disposal issue."
- Wood pallets are heavier than plastic pallets, and use substantially more fuel to transport, which increases greenhouse-gas emissions.

When it comes to pest risks, there is no comparison between plastic and wood pallets. A look at the facts shows why:

- Plastic pallets are impervious and nonporous; insects cannot penetrate plastic.
- Wood pallets are porous, absorb water, and not only can harbor bacteria and insects that can destroy forests and crops, but also bacteria that can contaminate food.
- Bacteria like salmonella, E. coli and Listeria carried on wood pallets put the U.S. food supply at risk, which is why we've asked FDA to launch a comprehensive investigation of wood pallets and the risks they pose to the nation's food supply.
- Unlike wood pallets, plastic pallets do not require fumigation with highly toxic methyl bromide before being shipped cross-border.
- An iGPS plastic pallet requires at most only a simple washing before being returned to the rental pool and usually requires no more than removal of any leftover pallet wrapping material and occasionally hand wiping.
- Unlike wood, iGPS plastic pallets are the only pallets on the market with embedded radio frequency identification tags. These RFID tags provide a means of tracking shipments and tracing them back to their point of origin.

- As such, iGPS plastic pallets with RFID tags enable the quick identification of sources of contamination, thereby reducing the risk of further spread of food-borne illness or other types of contamination.

In the three short years since iGPS has been in business, plastic pallets have been rapidly adopted into the U.S. supply chain, particularly for transporting food and other fast moving consumer goods.

As I've just outlined, the iGPS plastic pallet is so successful because it delivers dramatically superior performance in every dimension when compared to wood pallets.

The success of plastic pallets, however, is causing wood pallet makers to lose market share, which is leading some of these manufacturers and their surrogates to spread false and misleading information on the use of the fire retardant decabromine, or Deca, in plastic pallets. So that USDA is clear, here are the facts on Deca:

- Deca is a highly effective flame retardant widely used in plastics and fabrics, including plastic pallets. It is used throughout the supply chain – in aircraft, motor vehicles and commercial facilities – and it is used in plastic pallets. It has saved countless lives and preserved substantial amounts of property.
- The U.S. National Academy of Sciences and the European Union, each acting independently, have reviewed over a thousand studies on Deca, and found no adverse health effects associated with its use.
- The American Council on Science and Health has outlined the life-saving benefits of Deca and concluded that there is no credible medical or scientific basis upon which to support a ban on its use.
- Human exposure to Deca fire retardant in plastic pallets is negligible to non-existent. The Deca is molded into the plastic, and no transfer of Deca to food products has been detected.

In summary, its superior performance is making plastic the preferred pallet across all sectors of commerce.

By substituting plastic pallets for wood pallets in the supply chain, USDA and APHIS will not only preserve and protect U.S. agriculture and forests, it will help dramatically improve the environment and reduce risks to the U.S. food supply.

Thank you for your time.