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Animal and Plant Health Inspection Service

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

August 27, 2009
Washington, D.C.

Good morning. Thank you for the opportunity to appear before you today and provide our 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, which 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 believe that substituting plastic pallets for wood pallets will not only preserve and protect U.S. agriculture and forests; it will significantly improve the environment and reduce risks to the U.S. food supply.

In the three short years since we've 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. That's because the iGPS plastic pallet delivers dramatically superior performance in every dimension when compared to wood pallets — particularly in terms of food safety and environmental impact, fire safety and worker safety. Put simply, plastic pallets are a lighter, stronger, safer and more environmentally friendly alternative to wood pallets for storing and shipping goods.

When it comes to pest risks, there is no comparison between plastic and wood pallets. Consider these facts:

- Plastic pallets are impervious and nonporous; insects cannot penetrate plastic.
- Wood pallets are porous, absorb water, and can harbor bacteria and insects 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 only a simple washing before being returned to the rental pool.
- Unlike wood, iGPS plastic pallets are the only pallets on the market with embedded radio frequency identification (RFID) tags, which 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 food contamination and reduce the risk of spreading food-borne illness.

From an environmental standpoint, plastic pallets are the most sustainable pallets in use today. Independent analyses have documented that iGPS' pallet is dramatically better for the environment than wood pallets in every criteria, including ozone layer depletion and global warming impact. Because they are more than 30% lighter than the typical multi-use wood pallet, iGPS' pallets require less fuel to transport and therefore reduce fuel consumption and greenhouse gas emissions.

Plastic pallets do not deplete our forests, while wood pallets have been a major factor in deforestation: Nearly 40% of all hard wood harvested in the U.S. is for pallets, about two-thirds of which are limited use, one-way pallets. Each year, wood pallets use up 7.7 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.

Wood pallets present a major waste problem. Approximately 4.2 million tons of wood pallet materials were land-filled at municipal solid waste facilities in the U.S. in 1995. On the other hand, plastic pallets are 100% recyclable. Should an iGPS pallet become damaged, it will simply be remolded into a new one, thus eliminating the wood pallet "disposal issue."

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 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. I would be more than happy to take your questions.

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