



NATIONAL WOODEN PALLET AND CONTAINER ASSOCIATION

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March 31, 2009

National Association of State Fire Marshals
Comments for Consideration
Board of Directors Meeting – April 1, 2009

We applaud the safety goals inherent in the efforts by the National Association of State Fire Marshals (NASFM) in finalizing the Code Application Bulletin (CAB) for its members related to the safe storage of pallets in warehouses. We appreciate the opportunity afforded the solid wood packaging industry, its customers and suppliers to express concerns and potential solutions on pallet code compliance issues at the March 12 meeting at Underwriters Laboratories (UL) in Chicago.

Several topics were discussed and agreement was reached on a number of key issues. A process for clarifying outstanding interpretations was proposed.

There was a consensus that a task group should be set up to discuss issues important to the final CAB and develop compliance education materials that can be used in the field to enhance safety in warehouse environments. As we understand from Jim Narva, the NASFM Board will consider that group's formation at its April 1 meeting.

During the meeting, NASFM expressed the position that all-wood pallets are and will remain as the accepted baseline standard as per NFPA 13 *Standard for the Installation of Sprinkler Systems*. NASFM further indicated it is not seeking to change the rating of these pallets or to require listing for solid wood pallets. This position is fully supported and appreciated by the wood packaging industry and its customers.

The difference in fire performance between various wood species and pallet configurations was another question raised. An industry fire expert present at the meeting, who is a member of one of the NFPA 13 committees, stated that fire-test data is available on different wood species and while there are variations in burn rates, they remain well within fire hazard level understood by NFPA 13. It is the intent of the National Wooden Pallet and Container Association (NWPCA) and others to provide research and test data to the National Fire Protection Association (NFPA) that it can use to refine and clarify the interpretation of NFPA 13 for the benefit of NASFM members and others. The wood pallet industry believes that compressed wood should be considered as wood, just as it is in plywood, furniture and other products. NASFM also acknowledged that they accept both UL 2335 as well as FM 4996 as standards covering provisions in NFPA 13 regarding fire performance of pallets.

As the draft CAB proposal was causing confusion for Authorities Having Jurisdiction and the supply chain, NASFM agreed to remove it from the NASFM website until it could resolve technical issues and "to ensure its completeness and accuracy prior to publication." We thank NASFM for their recognition of this fact and removing the proposal so promptly following the meeting. In accordance with the goal of providing clarity to all, we would request that any future

CAB, training, or other documentation should be provided after the compressed wood issue has been clarified.

The issue of pallet storage has significant ramifications for both domestic and international unit load management. There are more than 1.2 billion wood pallets in use in the United States each day, which means that any significant change in regulations related to pallets has an immense impact that ripples throughout the domestic supply chain. This volume does not address the more than 100 million wood pallets entering the U.S. from foreign shores each year turning that domestic ripple into an international tsunamis.

We genuinely look forward to our working relationship with NASFM. Our hope is that through this cooperative effort NASFM and the industry can provide ongoing training, and a better understanding of the magnitude and complexity of the wood pallet supply chain.

Again, we thank NASFM and UL for providing the opportunity to address this relevant topic and look forward to working with NASFM on the aforementioned issues.

Respectfully Submitted By

National Wooden Pallet and Container Association (U.S.)
Grocery Manufacturers Association
Northeastern Lumber Manufacturers Association (U.S.)
Southern Forest Products Association (U.S.)
Sonoco (Global Packaging Company – U.S. Headquarters)
Wood Moulding & Millwork Producers Association (U.S.)

AIMMP (Wood Pallet Association of Portugal)
Assoimballaggi (Wood Pallet Association of Italy)
Balorman (Wood Pallet Association of Turkey)
Canadian Wooden Pallet and Container Association
EPV Nederlandse Emballage-En PalletIndustrie Vereniging (Wood Pallet Association for
The Netherlands)
European Pallet Association - EPAL e.V.
EMBAMAT EU, S. A. (Spain)
FAPROMA (Wood Pallet Association of Spain)
Fedustria and GROW International (Wood Pallet Associations of Belgium)
Federal Association for Wooden Packages, Pallets and Export Packaging (HPE – Wood
Pallet Association of Germany)
Seila and SYPAL (Wood Pallet Associations of France)
Swedish Packaging Association
Swedish Forest Industries Federation
Timcon – Timber Packaging (Wood Pallet Association of the United Kingdom)
VHP (Wood Pallet Association of Austria)
VHPI (Wood Pallet Association of Switzerland)

ADDENDUM

During the March 12, 2009 meeting of NASFM, Underwriters Laboratory and stakeholders, a consensus was reached to establish an ad hoc committee to discuss issues important to the final CAB and develop compliance education materials that can be used in the field to enhance safety in warehouse environments. The committee would be comprised of NFPA, NASFM, NWPCA and other concerned entities. The following individuals and entities have been identified by NWPCA as those who are interested in participating in this process and offer distinctive knowledge and insights for meeting the goals already described. They include, but are not limited to, the following:

NASFM

NFPA

NWPCA

Vern Butzine, Pallet One, Bartow, Fla

David Deal, CHEP, Orlando, Fla.

Dale Hart, Litco, Vienna, Ohio

Ron Lanier, Jr., Sonoco, Hartsville, SC

Rodney, McPhee, Canadian Wood Council, Ottawa, Ontario, Canada

Kuma Sumathipala, American Forest & Paper Assn., Washington, D.C.

John Swenby, Paltech Enterprises, Inc., Urbana, Iowa