



## NATIONAL WOODEN PALLET AND CONTAINER ASSOCIATION

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Attention: Code Application Bulletin  
National Association of State Fire Marshals  
1319 F Street, NW, Suite 301  
Washington, DC 20004

The National Wooden Pallet and Container Association (NWPCA) was founded 57 years ago, and is the largest organization of wooden packaging professionals in North America. Located in Alexandria, Virginia, NWPCA is an international trade association with 700+ company members who manufacture and recycle wood pallets and containers. As such we have a vital interest in the outcome of the decision before the National Association of State Fire Marshals (NASFM), which is evaluating existing codes relating to “Pallet Fire Loading Impact on Sprinkler Design.”

NWPCA member companies represent more than 40% of the solid wood packaging industry. We have talked with the CHEP America company about their concerns, and support their conclusions and recommendations as far as they go.

NWPCA, however, has the broader responsibility of speaking from an industry perspective – representing not only our members, but the thousands of pallet users who depend upon solid wood packaging for the safe, reliable and cost effective distribution of their products throughout the global supply chain.

The NASFM has for years used wood pallets as the benchmark against which to measure the fire safety of alternative platform materials. Wood remains the standard by which other pallet materials are measured and assessed. The following statements are made in NFPA 13:

5.6.2.7 The requirements of 5.6.2.2 through 5.6.2.4 shall not apply to non-wood pallets that have demonstrated a fire hazard that is equal to or less than wood pallets...

12.12.2.1...Indoor storage of non-wood pallets having a demonstrated fire hazard that is equal to or less than idle wood pallets and is listed for such equivalency shall be permitted to be protected in accordance with 12.12.1.

Moreover, as cited by Factory Mutual in their *Approval Standard for Commodity Classification of Idle Plastic Pallets – Class Number 4995* “Extensive research has been conducted utilizing wood pallets such that their relative fire hazard and the appropriate sprinkler demand requirements have been determined.”

There are approximately 1.2 billion wood pallets in circulation in the United States everyday, many of them in warehouses. Given the size and scope of wood pallet usage, a dramatic change in commodity classifications would be disruptive to commerce. With 93% of the market, solid wood pallets remain the principal platform material used by shippers, both domestically and for export.

When addressing the use of composite blocks in wood pallets, it should be recognized that 95% of the pallet remains wood. The blocks themselves are primarily wood chips bound by an adhesive that does not contain chemical components similar to those of plastic. Furthermore, that material does not make a wood pallet a plastic pallet any more than the nails used to hold the boards together make it a metal pallet. The NASFM categorizes composite panels as a wood material for residential and commercial buildings for fire rating purposes; this type of wood, which is used in much smaller quantities in pallets, should likewise be categorized as wood when used in pallets.

The threat of fire related to idle wood pallets is as important to the solid wood packaging industry as it is to those industries that use the pallets to store and transport goods. The NASFM has been satisfied that the standard in place has been adequate to protect the warehouse environment.

NWPCA asks the NASFM to recognize and respect the following considerations before changing existing standards.

- **Practical Consensus:** It is imperative that realistic protocol be reached between Factory Mutual (FM) and Underwriters Laboratory, Inc. (UL).
- **Economic Costs:** FM and UL set a standard, NASFM established regulations based on that standard, warehouses have invested millions of dollars to comply with the regulations, and the result has been a safer workplace environment.

- **Wood is wood:** The properties of wood have not changed in thousands of years. The fact that minute particles are being added to wood does not change those properties to a degree that would warrant a dramatic alteration to existing warehouse infrastructure.

NWPCA believes the efforts of the NASFM to review pallet safety in the context of new materials being introduced into the marketplace are important and valuable. We urge that this analysis be done in the context of the extremely grim economic conditions that currently exist. Dramatic new regulations that would require a complete overhaul of existing sprinkler systems would impose a significant hardship on most industries and could lead to the failure of some companies and the loss of jobs to their employees. In the current economic environment any changes need to result from credible science, a consensus approach, significant increase in safety, and a measured regulatory response.

NWPCA is grateful for the opportunity to express our concerns and look forward to working collaboratively with the NASFM on workplace fire safety issues.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bruce Scholnick', written over a horizontal line.

Bruce Scholnick  
President & CEO