

# Invasive Species and the Wooden Pallet One Step: From Problem to Solution

Bruce Scholnick, President  
National Wooden Pallet and Container  
Association

Continental  
Dialogue  
on Non-Native  
Forest  
Insects & Diseases

# Overview

- Enables raw materials, agriculture, manufactured goods, to move economically and efficiently
- Over 87% of shipped goods are transported on a wooden platform
- More than 1.2 billion wooden pallets in U.S. daily

# Wood Packaging vs. Alternative Materials

- Wooden pallets: Cost efficient, repairable, recyclable, sustainable material available
- Regrettable statement: “Were there no wooden pallets there would be no wood invasive species”

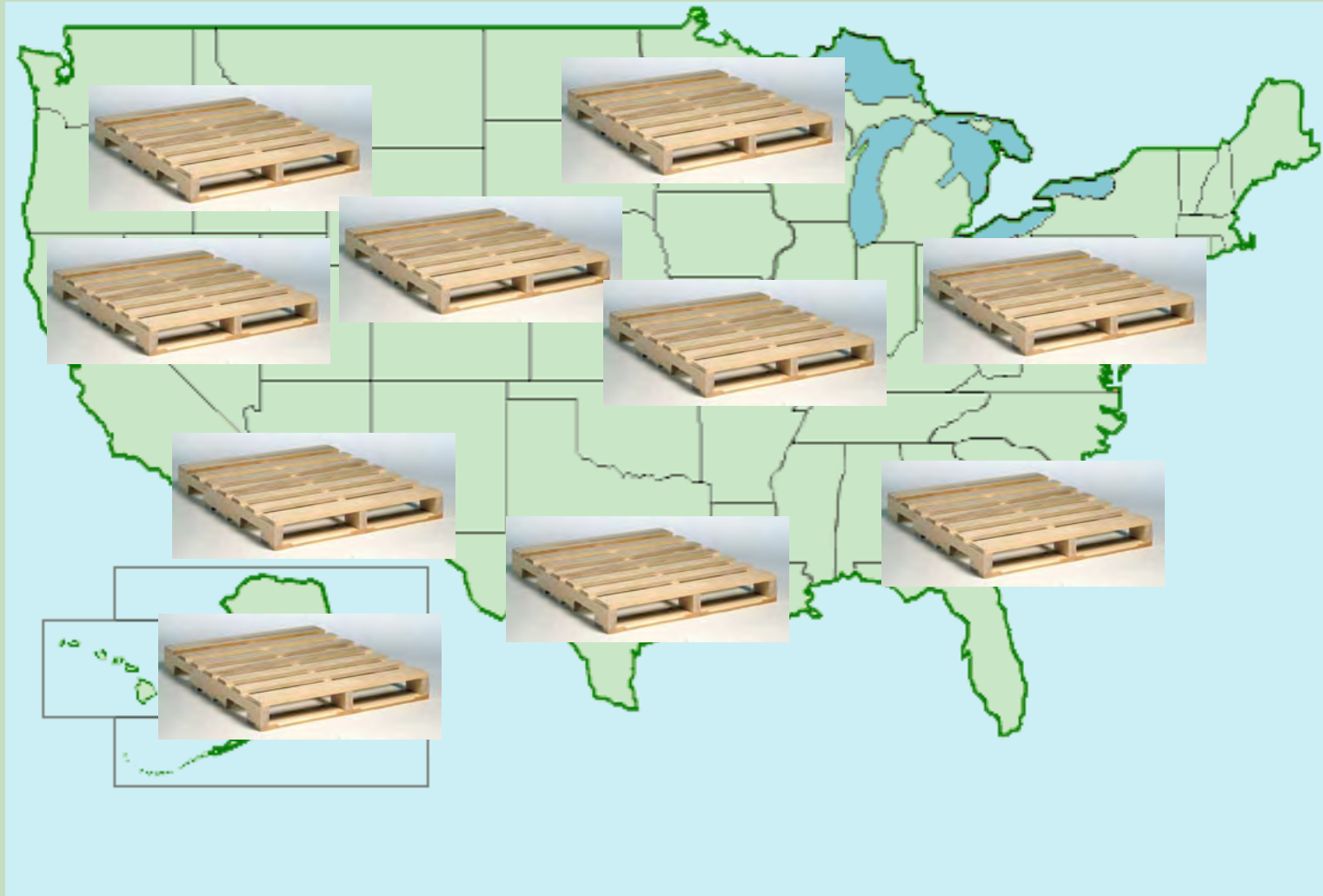
(From APHIS – Environmental Impact Study)

- Alternatives are not a viable substitute

# Stemming the Tide of Pest Migration

- Emerald Ash Borer (EAB): One of many invasive species
- Patchwork approach applied after each infestation will not work
- Pallet makers do not know destination
- Customers will not sort in-state vs. out-of-quarantine

# National Program



# Effective Treatment Program

- EU emergency regulations
- ISPM 15 – 99.9% success rate (1/10 of 1% interception rate world-wide is reported)
- APHIS/NWPCA/ALSC: administration, enforcement, monitoring
- “Serum” for international inoculation
- Industry begging “regulate us NOW”

# Questions Needing Answers

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# Benefits

- Responsibility for compliance where it belongs – with pallet providers
- Market confusion would end
- Alternative material manufacturers would stop using existing confusion to market costly, environmentally harmful products
- Having removed solid wood packaging from the invasive species equation, APHIS can focus on the other pathways

# Reaction to NWPCA Initiative

- Customers: Favorable
- Industry: Favorable
- Environmental Groups: Favorable
- USDA/APHIS: Favorable

**So what is the problem?**

# Analysis of the National Plant Protection Act and Legal Authority for Preemptive Measures

- Section 7711(a) of Title 7 the United States Code provides that “no person shall import, enter, export, or move in interstate commerce any plant pest, unless the importation entry, exportation, or movement . . . is in accordance with such regulations as the Secretary may issue to prevent the introduction of plant pests into the United States or the dissemination of plant pests within the United States.”

# Analysis of the National Plant Protection Act and Legal Authority for Preemptive Measures

- Section 7712(a) provides that “The Secretary may prohibit or restrict the importation, entry, exportation, or movement in interstate commerce of any plant, plant product, biological control organism, noxious weed, article, or means of conveyance, if the Secretary determines that the prohibition or restriction is necessary to prevent the introduction into the United States or the dissemination of a plant pest or noxious weed within the United States.”

# Analysis of the National Plant Protection Act and Legal Authority for Preemptive Measures

- be subject to remedial measures the Secretary determines to be necessary to prevent the spread of plant pests . . .”

# Analysis of the National Plant Protection Act and Legal Authority for Preemptive Measures

- “No State or political subdivision of a State may regulate the movement in interstate commerce of any . . . means of conveyance . . . in order to control a plant pest . . . or prevent the introduction or dissemination of a . . . plant pest . . . if the Secretary has issued a regulation or order to prevent the dissemination of the . . . plant pest . . . within the United States.”