

# “Not Authorized”

## Plastic Pallets Containing Specific Fire Retardant

### Not Approved by FDA for Produce Hydrocooling

**H**ydrocooling is a process used to cool fruits and vegetables immediately after harvest to preserve their freshness and lengthen shelf life. But some produce companies are using plastic pallets containing the fire retardant decabromine in this procedure.

A letter written by the Consumer Safety Officer at the Food and Drug Administration (FDA), posted on the Refrigerated & Frozen Foods website ([www.refrigeratedfrozenfood.com](http://www.refrigeratedfrozenfood.com)) warns, “...if pre-cooling solution is recycled and/or there is vertical racking of the dripping pre-cooled pallets, there is the possibility that decabromodiphenyl ether (also called deca-bromine) **may become a component of the produce...**”

The letter, by Elizabeth Sánchez Furukawa, Ph.D., from the FDA's Division of Food Contact Notifications, defines a food additive under the Federal Food, Drug, and Cosmetic Act as “any substance the intended use of which results or may reasonably be expected to result, either directly or indirectly, in its becoming a component or otherwise affecting the characteristics of any food.”

NWPCA sought further clarification. In a follow-up letter by Dr. Sánchez Furukawa, she states that plastic pallets “used during precooling for fruit and vegetables, which involves

immersion of the pallet and the fruits and vegetables in water and recycling of the water...describes a food additive situation for the use of decabromodiphenyl ether as a component of plastic pallets.” She went on to say:



***“Decabromodiphenyl ether (deca-bromine) is not authorized for this use, and in order for it to be used in contact with food under the Federal Food Drug and Cosmetic Act, it must have pre-market approval.”***

How much deca-bromine is contained in plastic pallets?

A lifecycle analysis by Intelligent Global Pooling Systems (iGPS) states its plastic pallets contain as much as **3.4 pounds** of deca-bromine chemicals.

#### Wood Pallets...The Sustainable Choice

Wood pallets are a byproduct using wood that is strong and durable, but discarded by furniture and home builders for cosmetic purposes. More than 1.2 billion wood pallets are in service each day in the United States. When these wood pallets can no longer be repaired to a standard that ensures protection of the goods being shipped and safety of workers handling the load, the pallets are recycled into new products such as landscape mulch, animal bedding, boiler fuel, firewood and wood stove pellets. The nails from ground pallet chips are removed through a variety of collection technologies and sold as scrap metal to be used again – from cradle to grave wood pallets are the sustainable choice for those in the supply chain who are concerned about preserving our environment by using natural products like wood.

**Wood pallets, like fresh produce, are a natural product.**



NATIONAL WOODEN PALLET AND CONTAINER ASSOCIATION

1421 PRINCE STREET, SUITE 340  
ALEXANDRIA, VA 22314-2805

PH: 703.519.6104 FAX: 703.519.4720  
[WWW.PALLETCENTRAL.COM](http://WWW.PALLETCENTRAL.COM)