



Feb 15 2008

Air Resources Board
1001 I Street
Sacramento, CA 958144

RE: ITI Comments on Modified Final Proposed Version of the Airborne Toxic Control Measure (ATCM) to Reduce Formaldehyde Emissions from Composite Wood Products

The Information Technology Industry Council (ITI) represents several dozen major manufacturers of computers, televisions, wireless devices, printers, and other electronic equipment. While ITI members do not manufacture composite wood products, we do ship products around the world using pallets and crates that may be manufactured with composite wood products. In addition, ITI members often import products, parts, and components manufactured globally that are packaged in wooden crates or distributed using wood pallets. While ITI supports the goals of the ATCM to reduce formaldehyde emissions, we believe this approach will result in a premature disposition of packaging materials that had many more years of useful life, generating significant amounts of preventable wastes. ITI also believes that the certification process for home furnishings and furniture is overly burdensome and certification should focus on composite wood products installed as part of a building or structure.

We are concerned that the recent rulemaking and impending regulation for composite wood products in California did not adequately address the concerns and real world implementation aspects of the shipping industry and specifically on packaging materials. Engineered wood products (plywood, OSB, etc) have become more readily available in the shipping industry today to provide the necessary protection for the product during shipment, hold up to the physical demands during transport, and to avoid treatment costs associated with international phytosanitary measures. While crate and dunnage materials have historically been constructed using composite wood products, pallets have recently migrated towards the use of composite wood materials. Pallets and packaging products do not pose the same risks or exposure pathways as fabricated products containing composite wood products. Pallets are transient materials that are often stored in warehouses or transported in vehicles that pose little or no risk of exposure to humans. Crating and dunnage likewise pose little harm, by being disposable/recyclable by the end user. Unlike most fabricated goods, pallets and packaging have very different use and applications which result in very different exposure scenarios.

Manufacturers have little or no control over third-party warehouses or distribution facilities activities that result in repacking functions (i.e., re-palletize). This is a very common practice in the retail market channel. It would be unfair to any OEM or producer in such situations. In order to avoid the possibility of a noncompliant, reusable pallet or crate would be shipped into California, we may be forced to discard the existing

inventory and replace with new packaging. This will result in a premature disposition of packaging materials that had many more years of useful life. In addition to generating waste it would increase shipping costs, as new crates and pallets would have to be purchased to replace the existing inventory.

We respectfully request that you and members of the composite wood product implementation team give careful consideration to packaging materials and pallets. We believe that most logical approach is to exempt these materials from the requirements to meet the applicable performance standard.

If you have any questions regarding these requests for amendments or would like further information, please contact Chris Cleet at ccleet@itic.org or 202-626-5759. We look forward to further engagement on this important issue and welcome the opportunity to provide more information or background for your additional consideration.

Regards,



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ABOUT ITI

The Information Technology Industry Council (ITI) represents the nation's leading high-tech companies and is recognized as one of the most effective advocacy organizations for the tech industry in Washington and internationally. ITI helps member companies achieve their policy objectives through building relationships with Members of Congress, Administration officials, and foreign governments; organizing industry-wide consensus on policy issues; and working to enact tech-friendly government policies.