

11/12/19 AGENDA, ITEM 5a - ORDINANCE TO EXPAND THE BAN ON POLYSTYRENE FOOD SERVICE WARE  
SUPPLEMENTAL LETTER AND ATTACHMENT SUBMITTED BY THE CALIFORNIA GROCERS ASSOCIATION  
TO THE CITY COUNCIL ON 11/12/19 AT 2:32 P.M.

November 12, 2019



The Honorable Stacey Armato  
Mayor, City of Hermosa Beach  
1315 Valley Drive  
Hermosa Beach, CA 90245

RE: Food Packaging Ordinance

Dear Mayor Armato,

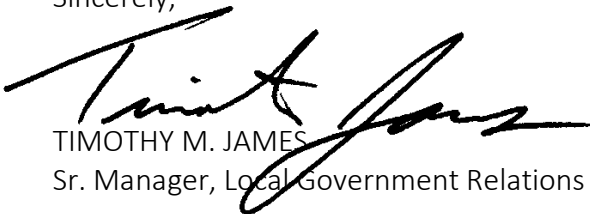
I write to request minor adjustments to the food packaging ordinance in order to ease implementation for impacted businesses. The grocery industry has made significant sustainability commitments and appreciates your efforts for Hermosa Beach. Along those lines, we believe allowing a 12-month implementation period for grocery stores, particularly for raw food products, will increase initial compliance.

As grocers we know that implementing these types of mandates can take considerable time, specifically with raw food items. Grocery stores prepared and raw food packaging must maintain its safety and integrity for days or weeks and withstand both hot and cold holding temperatures, as well as moisture. Failure to have packaging options available which meet these standards would result in threats to food safety and reduced shelf-life leading to unnecessary food waste.

Transition to new packaging includes identifying a suitable replacement, testing its safety and durability, procuring significant quantities of the packaging and then in-store roll out. To ensure packaging changes can be made and implemented with sufficient time we believe 12-months is necessary. This time period has been used in numerous other jurisdictions passing similar food packaging regulations.

We respectfully ask Council to amend the proposed ordinance to allow 12-months for grocery stores to implement the requirements on prepared and raw foods. Thank you for your consideration and we look forward to partnering with the city on implementation efforts.

Sincerely,



TIMOTHY M. JAMES  
Sr. Manager, Local Government Relations

cc: Members, Hermosa Beach City Council  
Ms. Suja Lowenthal, City Manager, City of Hermosa Beach  
Ms. Elaine Doerfling, City Clerk, City of Hermosa Beach

## Jurisdictional Comparison on Food Packaging Ordinance Implementation

	Implementation	Feasibility-based Waiver	Waivers Granted	Waiver Limitations	Curbside Composting
<b>Manhattan Beach (2019)</b>	10-months	Yes	12-month for product category	Maximum 1 year	No
<b>San Francisco (2016)</b>	12-months	Yes	12-month for product category	Up to 36 months	Yes
<b>Malibu (2016)</b>	13-months	Yes	12-month for product category	24 months allowed through two 12-month waivers	No
<b>San Diego (2019)</b>	5-months (Delayed enforcement and 24-month waiver approved before implementation)	Yes	24-month for product category <b>APPROVED</b>	24 months per waiver with no limitation on additional waivers	No
<b>Solana Beach (2019)</b>	13- months	Yes	12-month for product category	--	No
<b>Hermosa Beach (2019)</b>	<b>8-months</b>	<b>Yes</b>	<b>12-month for product category</b>	<b>12 month waiver</b>	<b>No</b>