

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
Manhattan Beach (2019)	10-months	Yes	12-month for product category	Maximum 1 year	No
San Francisco (2016)	12-months	Yes	12-month for product category	Up to 36 months	Yes
Malibu (2016)	13-months	Yes	12-month for product category	24 months allowed through two 12-month waivers	No
San Diego (2019)	5-months (Delayed enforcement and 24-month waiver approved before implementation)	Yes	24-month for product category APPROVED	24 months per waiver with no limitation on additional waivers	No
Solana Beach (2019)	13- months	Yes	12-month for product category	--	No
Hermosa Beach (2019)	8-months	Yes	12-month for product category	12 month waiver	No