

#24
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Cc: [BOS-Clerk of the Board](#)
Subject: Item 24 - Packaging and Beverage Containers
Date: Tuesday, September 30, 2025 7:11:04 AM
Attachments: [FIDoCo Plastics LTR.pdf](#)

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Supervisors, Please accept the attached letter regarding item 24 on 9/30/25 agenda. Please contact me with questions or to discuss. Thank you for your consideration. Tim

Timothy James
Director, Local Government and Enterprise Risk
California Grocers Association
916-448-3545

September 30, 2025



The Honorable George Turnboo
Chair, El Dorado County Board of Supervisors
330 Fair Lane, Building A
Placerville, CA 95667

RE: Item 24 – Packaging and Beverage Containers

Dear Chair Turnboo,

On behalf of El Dorado County grocers, I write with some concerns regarding the pending proposal to regulate food and beverage packaging. First, the aggressive process timing appears to leave out any meaningful outreach or opportunity for impacted business to understand and respond to the proposal. Next, the provided information is generic and includes no context or connection to the current regulatory environment, especially recent state legislation and regulatory actions. Additionally, there appears to be no recognition of the increased costs to consumers, negative environmental impacts or increased operational difficulties for current and future grocery stores. We ask a commitment not be made to pursue regulation until additional and complete information is presented to make a fully informed decision.

Specific to the consideration process the provided materials call for a formal vote on an ordinance in 29 days. However, there is no timetable or even mention of outreach to impacted retailers. I am sure the Board will agree that the best policy comes from allowing for and recognizing input from all involved. We currently do not see that opportunity in this plan.

We believe that less than a month for food retailers, especially small and independent businesses, to receive, digest and provide feedback is too short. The provided materials also suggest a specific implementation date which appears disconnected from the opportunity for impacted food retailers to engage the process and implement any new regulation. If the Board wishes to pursue these regulations, we ask that ample time and an open process be used to ensure participation by the regulated businesses.

The provided information also fails to recognize that the regulatory landscape on the items mentioned has changed dramatically. Before proceeding we urge the Board to review and understand recent California law which directly or indirectly impacts the products mentioned.

Passed state legislation of note includes, but is not limited to, Senate Bill 54 (2022) which requires a rigorous Extended Producer Responsibility process for plastic packaging and prohibits the sale of expanded polystyrene foam food ware as of January 1, 2025. Senate Bill 270 (2014), Senate Bill 1046 (2022) and Senate Bill 1053 (2024) which together essentially prohibits all types of plastic film bags for use at food retailers. Senate Bill 1013 (2022) which dramatically redesigns the California redemption value recycling system to significantly expand recycling opportunities for all beverage containers, especially in rural and previously unserved areas.

It is critical to note these pieces of state legislation were either passed or implemented since the City of South Lake Tahoe (SLT) passed ordinances. The previous efforts by SLT are now either unnecessary, have diminished value, or are now considered contrary to broadly supported and accepted statewide environmental efforts.

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The banning of recyclable plastic water bottles both ignores and fails to achieve the stated environmental and health goals. Replacement products for recyclable plastic water bottles, like aluminum cans, also contain a plastic lining. Aseptic containers contain a plastic lining and are not recyclable. All replacement products also require more resources to produce, cost more to produce, and weigh more requiring more environmental impact to transport the product. Furthermore, an aluminum can, glass container or aseptic container is just as likely to end up as litter as any other item.

The impact to consumers and businesses must also be taken into consideration. Both considerations were dismissed by SLT when regulating and now residents, visitors and both current and future food retailers bear the consequences. Due to the complications of sourcing compliant product the ability for consumer to purchase an appropriate amount of water is diminished.

Consumers, especially visitors, regularly share their disappointment in being forced into a size or style of product that does not fit their use or preference. With increased operational costs and sales impacts full-size grocers in SLT have experienced a loss of \$150,000 to \$200,000 annually. This is a tremendous amount given grocers operate on 2-3% profit margin.

Again, we ask the Board to not make a commitment to pursue an ordinance due to the limited information, lack of promised benefits and impact to consumers and businesses. We do ask a thorough review of the impacts of these types of ordinances be fully understood and impacted businesses are directly involved in policy formation. Thank you for your consideration a please consider us a partner on this and other issues impacting grocers.

Sincerely,



Timothy James
California Grocers Association

CC: Members, El Dorado County Board of Supervisors