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Orwigsburg, PA 17961

February 27, 2019

Anne McIntosh, Community Development Director
Dana Murray, Environmental Manager
The City of Manhattan Beach

Dear Ms. McIntosh and Ms. Murray:

I am writing regarding Manhattan Beach's desire to ban foam meat trays. First, I want to applaud your efforts because, as you well know, polystyrene is extremely harmful to both people and the environment.

Because meat is by its very nature moist, the most viable alternative – one that maintains product freshness and the tray's structural integrity -- is a 100% recyclable PET tray. However, until only recently, this option was not necessarily feasible due to the following challenges shared by grocery chains nationally and expressed recently in the press:

- *The sharp edges of the recyclable trays cut the overwrap film.*
- *The in-store machines will need to be replaced.*
- *The cost of a recyclable tray outweighs the benefits.*
- *Shelf life may be impacted.*
- *We will wait until it is mandated by the government.*

Well, Clearly Clean can help! The company has received multiple comprehensive patents on its Roll Over-Wrap™ Tray, making it the world's only patented 100% recyclable, smooth-edge overwrap PET tray for food packaging. The tray overcomes the objections listed above as follows:

The sharp edges of the tray cut the overwrap film.

The tray's rolled edge provides a smooth surface for overwrap film, mitigating leakers during production and transportation.

The in-store machines will need to be replaced.

Grocery stores can immediately replace all plastic foam trays on high-speed packaging machinery or in-store automatic wrappers; there is no need to change equipment. The trays are plug and play.

The cost of a recyclable tray outweighs the benefits.

PET is inherently more expensive than Styrofoam. However, when you look at the environmental impact, the world can't afford to opt for a non-recyclable option. In addition, when you consider the total cost of ownership (both hard and soft factors), our tray is actually fairly comparable to current trays. This is due to the following reasons:

- Less shrink: This tray minimizes product loss / shrink because the rolled edge makes this tray three times stronger than polystyrene, so it won't break during normal use nor bow tie due to weak walls – and it can be reworked again and again.
- Takes up less room: The company can ship twice as much of its product per trailer load because of the way the trays stack together, freeing up dock and warehouse space. This will also reduce the environmental impact of additional transportation.

Shelf life may be impacted.

Clearly Clean's trays are in thousands of grocery stores across the country, and the shelf life has been equivalent to – if not better – than its foam counterparts.

We will wait until it is mandated by the government.

While many processors have moved to embrace the change to an environmentally friendly option, not all are so eager – and grocery stores are among the most reluctant for the aforementioned reasons. We realize that local governments in the state of California have taken the lead in identifying products that negatively impact the environment and are making decisions to mandate change. We know that we can provide an alternative to polystyrene trays if banned that can adequately address the historical concerns of the grocers at a reasonable cost.

The point of this letter is that there is indeed a viable alternative to foam. In the near future, we hope that all trays in your local grocery stores will have a #1 recycling symbol. Clearly Clean would welcome the opportunity to share additional insights learned while migrating companies to a recyclable tray option.

Thank you for the opportunity to comment. And keep up the good work!

Sincerely,

Lisa Grimes
Clearly Clean