

**Testimony of
Javier Lojan, Acting Commissioner
New York City Department of Sanitation**

**Hearing before the New York City Council
Committees on Sanitation & Solid Waste Management
Wednesday, April 23, 2025 10:00 A.M.**

Oversight Hearing: Commercial Waste Zones

Good morning Chair Abreu and members of the Committee on Sanitation & Solid Waste Management. I am Javier Lojan, Acting Commissioner of the New York City Department of Sanitation, and I am joined today by Neil Eisenberg, Deputy Commissioner, Strategic Initiatives, and by Frank Marshall, Assistant Commissioner, Bureau of Commercial Waste.

I am in my 26th year with New York's Strongest, and over that time period, I have seen many changes to our operation. Safety and efficiency have increased steadily throughout the years. But DSNY only services New York City's residential properties, with our hundreds of thousands of businesses employing a serpentine network of private companies to haul and process their waste.

At the time that DSNY was innovating and improving our collection operations, some of these companies were doing the same – but others were engaged in a race to the bottom, prioritizing price and speed over safety, and environmental justice.

Local Law 199 of 2019 was crafted through years of negotiation to address that; to bring the commercial carting industry in New York City in line with the best practices seen in the public sector. When fully implemented, we are looking at about 12 million fewer miles traveled by commercial carting vehicles. And, making good on a promise from when this program was created, businesses will pay less for the collection of recyclables and compostable material than they do for trash at a citywide average of 32% less for recycling and 18% for compostable material. That means businesses will have a meaningful financial incentive to separate their waste properly.

In short, commercial carting will be safer for workers, of a higher quality for businesses, and better for our environment.

As part of this program, all commercial carters are or will be required to make substantial upgrades to the safety equipment of their vehicles, including the installation of back-up cameras, auxiliary exterior lighting, and GPS monitoring systems like the ones used by municipal waste vehicles. Requiring carters to make this investment will make a real difference in safety; we believe it already has. All workers in this sector are also receiving a new mandated safety training of 40 hours in the first year, plus an eight hour refresher every year thereafter. There was no standardized safety training requirement or New York City-specific requirement for safety equipment prior to Local Law 199.

And DSNY is using the new authority it has been granted under this law to enforce these safety requirements. Enforcement is not reactive under CWZ; it is built into the program's design. We have established clear thresholds, reporting requirements, and penalties to hold awardees accountable. DSNY officers hold daily field inspections.

In January, after years of planning and months of outreach, the first of New York City's 20 non-exclusive Commercial Waste Zones came online in Corona, Elmhurst, and Jackson Heights. Since inspections began in that zone on September 3, 2024, DSNY has issued 197 Notices of Violation for vehicle and driver safety issues like spillage, unregistered vehicles, and street obstruction, as well as two company-level Notices of Violation to carters who had too many violations by their drivers. Each of those carry fines of \$2,500, with penalties that increase if issues continue.

A new standard of oversight has arrived in the commercial carting industry, with the Bureau of Commercial Waste leading the way through advanced technology and data-driven enforcement strategies.

Any updates to safety regulations will be informed by the work of the Safety Task Force created under the law. Local Law 199 outlines 11 members of this Task Force, including four individuals appointed by the City Council as a whole and one appointed by the Council Speaker; I would like to remind the Council that despite often expressing concern about the success of this program, this body has at this time not filled two of these five seats. Mayor Adams' appointees represent a broad range of policy knowledge and professional experience, and the administration would welcome the opportunity to collaborate with Council appointees as dictated by the law.

On safety, enforcement, and customer sign-ups, Queens Central has seen a successful launch. Incredibly, not a single one of the thousands upon thousands of businesses in the Zone has made a complaint to DSNY of any issues with service or billing, but the Bureau of Commercial Waste learned a tremendous amount during this first-of-its-kind implementation that will be useful for future zones.

In the past, advocates had called for DSNY to launch the entire City at once; having led the roll-out of this first zone, I can tell you I am incredibly thankful that we did not do that. Traditionally, data about commercial waste generation in New York City has been extremely limited, and there was so much to learn during this process about the needs of businesses, the capacity of carters, and the relationship between the two.

This first zone implementation was an extremely intensive process. DSNY in-house and contracted outreach staff visited some businesses eight to 10 times to discuss the specifics of the program, and significant resources went into making sure that these conversations could take place in a diversity of languages and with full cultural competence. Carters also engaged in outreach as they pitched their services, with all carter advertising approved by DSNY.

Beyond outreach, both DSNY and the carters also needed to make substantial operational updates, with the carters producing reams of new data and our team reviewing it in great detail to inform both further implementation and enforcement.

And that's to say nothing of the businesses themselves, many of which were thinking about their waste generation in a real way for the first time. While the online portal at nyc.gov/commercialwaste is extremely intuitive and easy to use, the laundromat or the coffee shop still needs to take time from the real work of running their business to make these decisions. When a business failed to make this decision, DSNY made assignments as necessary that prevented any lapse in service – a remarkable example of what government can do.

However, I must emphasize that if this implementation had been rushed, if we had been spread thinner, if the carters had not been given the time to do this right, it absolutely would have failed, and the entire program might have fallen apart.

Following this first zone, we have recently completed a data analysis that will allow for the moment that you all have been waiting for: the start of the next zones later this year, as well as the announcement of the full roll-out order to reach citywide implementation.

DSNY will next launch two zones, Bronx East and Bronx West, together covering that borough in its entirety. The outreach and customer sign-up period for those zones will begin October 1, 2025, with full implementation complete by November 30, 2025. As of this moment, nyc.gov/commercialwaste has also been updated to show the order in which the remaining 17 zones will come online in cohorts, fully complete by December 31, 2027.

This is a massive change to an industry that has for too long been treated as a race to the bottom. Minimum standards like the kind achieved under this program help businesses, they help the environment, and they help workers. We are proud to be getting it done.

Proposed Legislation

I will now turn to the bills on today's agenda.

Intro 1228, sponsored by Chair Abreu, takes on the issue of commercial organics separation. The Adams administration and this Council have worked closely on residential composting over the last several years, but requirements for businesses have lagged behind, being covered by the arcane and outdated Local Law 146 of 2013. We agree with the Council Member that requirements for businesses to source-separate compostable material should match the City's commitment to diversion of compostable waste on the residential side. Particularly given that the Commercial Waste Zone system will improve commercial diversion by providing financial incentives to businesses, we support this bill.

Int-784, sponsored by Council Member Nurse, primarily relates to the work of the Business Integrity Commission, and we will defer to BIC's written testimony.

Thank you, and we look forward to taking your questions.



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Elizabeth Crotty
Commissioner and Chair

**Testimony of Elizabeth Crotty, Commissioner and Chair of
the New York City Business Integrity Commission,
To the Committee on Sanitation and Solid Waste Management of
the New York City Council**

April 23, 2025

Good morning, Chair Abreu and members of the City Council Committee on Sanitation and Solid Waste Management. My name is Liz Crotty, Commissioner and Chair of the Business Integrity Commission or “BIC.”

BIC regulates companies operating in the commercial waste (or “trade waste”) industry, and at the City’s wholesale public food markets. Our focus is ensuring that these industries operate fairly, safely and without corruption, while protecting customers.

Our regulatory mission is achieved through in-depth review of every application received from companies seeking a BIC license or registration (depending on the type of waste they haul). The Commercial Waste Zone (“CWZ”) awardees haul refuse and recyclables from businesses in the City and represent a subset of the 1,900 total trade waste licensees and registrants. CWZ does not impact BIC licensees and registrants that haul other types of material from businesses like construction and demolition debris, used cooking grease, medical waste, on-call junk removal, or businesses that are approved for self-hauler registrations to perform their own waste removal such as landscapers.

Like all BIC licensees and registrants, the CWZ carters will continue to apply for renewal of their BIC license every two years including while CWZ is ongoing, and go through the BIC review process, which focuses on the good character, honesty, and integrity of applicants. BIC and DSNY have a long-standing partnership, and the two agencies are in continuous contact from the leadership level down. Our agencies share information and data, work together through the CWZ Safety Task Force, and collaborate on other matters as needed.

Anecdotally, under the Adams administration, crashes involving CWZ licensees are down 60% in 2024 compared to 2023. And overall, issuance for BIC, violations has increased 110 % .

Intro. 784 concerns grease haulers, one type of specialty waste explicitly exempt from CWZ. There are several issues with Intro. 784, and BIC respectfully requests further engagement with the

Council to address these matters. First, with regard to the proposed new section 16-529, the proposed reporting requirements are duplicative of the customer registers BIC already collects per its customer register rule for the licensees (the carters). Customer registers are lists from the Licensees/carters of all their customers, which includes business name and address, date and in the case of Intro. 784 quantity of grease collected for the previous quarter. This can be found in section 5-03(g) of Title 17 of the Rules of the City of New York.

BIC sends directive to remind the licensees of the customer register rule and to submit before the due date via our Online Portal. When a licensee fails to adhere to the rule, BIC issues a violation with the intent of collecting the customer register. BIC maintains the customer registers and uses the data for various regulatory enforcement purposes. This data is not publicly available as it is considered the carting companies' propriety business information, and also includes personal identifying information. The information sought under paragraph four of subdivision (b) (regarding facility where the grease is disposed) is already collected as part of DSNY's semi-annual tonnage survey of the carters, which BIC helps facilitate.

Finally, BIC also has concerns about the utility of the reporting required by subdivision (c) of proposed section 16-529 as it falls outside of the scope and authority delineated from the City Charter. BIC simply does not have regulatory jurisdiction over commercial establishments, including those at issue here, food service establishments that generate grease. It is beyond the scope and authority of BIC's mandate delineated in the City Charter.

BIC is happy to work with the Council to address any concerns or constituent complaints, whether they be about the grease haulers or any other matter under our authority. Please always feel free to contact me or my team directly or share with your constituents BIC's complaint submission portal which is linked on the homepage of our website.

Thank you for the opportunity to share our concerns about Intro. 784. BIC welcomes the opportunity to discuss the goals of this bill further with the sponsors.



OFFICE OF THE BROOKLYN BOROUGH PRESIDENT

ANTONIO REYNOSO

Brooklyn Borough President

**Committee on Sanitation & Solid Waste Management
Oversight – Commercial Waste Zones (and Intros 784 and 1288)
April 23, 2025**

Good afternoon, Chair Abreu and thank you for holding this hearing today. I know that it's rare to get more than one hearing on a topic in such a short timeframe, and I really appreciate you giving this level of attention to Commercial Waste Zones. This is especially necessary given the lack of information from DSNY about their intentions for fully implementing the program.

While we never envisioned a pilot program in the CWZ legislation, I was pleased to hear that the pilot zone, Queens Central, was a success by many accounts. I appreciate DSNY providing my office with regular updates, which is how I know that at this time, all businesses are signed up with a carter and the zone is functioning as intended.

However, I also learned some concerning information – of the three assigned carters in Queens Central, two have already received \$2,500 penalties for reaching an excessive number of safety violations in a short timeframe. While on one hand, this indicates that DSNY is doing its job with increased enforcement in the zone, it also speaks to the fact that the industry is still in need of a major culture shift that won't happen until all 20 zones are fully implemented.

There are also outstanding questions regarding critical components of CWZ such as improved labor practices, increased diversion rates, reduction in vehicle miles traveled, and upgrades to the fleets. However, I am reticent to judge the program based on observation from a short time in one area, because again, the real impacts will be felt when the program is operating citywide.

Which begs the question about next steps. I'm not the only one who has been patiently waiting for DSNY to provide information about its intentions for rolling the program out. Carters contact my office frequently telling me they need to know what to expect about when their business will shut down (if they weren't awarded a zone) or when they need to make new investments (if they were). Additionally, we know that due to industry consolidation, at least one zone needs to be reopened for a new carter to be added, yet we've heard nothing about whether this has happened and if so, what carter DSNY selected.

Today's economy is unpredictable enough, and these small businesses deserve clarity on what their future holds.

Meanwhile, the delayed implementation has meant more unnecessary vehicle miles traveled (VMT), more unsafe working conditions for transfer station employees, and more dangerous trucks on our streets. DSNY has referenced issues with budget and staffing as an impediment to program expansion but has yet to respond to specific questions about these needs as Chair Abreu requested at the budget hearing in March. DSNY: help us help you!

Before I get into the specific legislation being heard today, I want to address two more outstanding points that we've discussed at length but that remain problematic. First, I am deeply concerned that Cogent remains on the awardee list and that BIC and DSNY have not collectively figured out a way to pull their license, given their egregious issues with environmental practices and worker safety. Second is regarding Intro 55, which would allow commercial carters to tip at the Marine Transfer Stations (MTSs). DSNY testified at the budget hearing that there is "no interest" from the carters in doing so, but I know for a fact that that's not true. I heard directly from a carter who said they expressed intent to tip at an MTS in their RFP response, which would be in line with the CWZ program's intent to reduce VMT and utilize facilities that comply with labor standards. Yet this company was not selected, and they speculate it was due to the cost of tipping at an MTS. I would appreciate more honesty and transparency from DSNY on this issue.

Regarding the bills being heard today:

Intro 1228 would expand the types of businesses required to source separate organics. I fully support this effort, which would help divert food waste from landfill, and also appreciate the Council exempting food waste that can be salvaged for donation. Tying this mandate to CWZ only creates a stronger incentive for DSNY to implement the program in full.

Intro 784 would create a tracking system for disposal of yellow and brown grease. The goal is to deter both illegal disposal and theft. I would like to see the language be a bit more specific to create a "chain of custody" tracking requirement - tracking from the source, through collection, and ultimately to disposal.

Thank you again for holding this hearing today. Let's work together to get this done.

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**NWRA Testimony Before NYC Council Sanitation and Solid Waste Management Committee
April 23, 2025**

My name is Lew Dubuque, and I am the Vice President for the Northeast of the National Waste & Recycling Association (NWRA). NWRA represents the private sector waste and recycling services industry. Association members conduct business in New York City and all 50 states and include companies that manage waste collection, recycling and medical waste, equipment manufacturers and distributors, and a variety of other service providers. NWRA represents the hardworking men and women of the industry who collect and manage the waste, recyclables and organics produced by the more than 100,000 commercial entities in this great city. Our member companies will also be servicing customers in 19 of the 20 Commercial Waste Zones across New York City when it is fully implemented.

We all agree the rollout of the Commercial Waste Zone Program requires intentional planning, clear and consistent communication amongst all parties, and data-driven adaptability to address the reality of the Program's real-time implications. A smooth transition hinges on Awardees' ability to carry-out the requirements of Local Law 199 and the DSNY's roll-out instructions. We staunchly believe that a communicative, proactive, and symbiotic partnership between the DSNY and Awardees is the only credible path to ensuring the success of the CWZ Program.

To establish that partnership, we request that DSNY address the following considerations:

1. Sharing the full zone-implementation timeline with Awardees is of paramount importance. Understandably, the roll-out timing imposes extensive financial and operational implications on both Awardees and non-Awardees. It is critical that DSNY honors the intention to announce the roll-out schedule shared by Assistant Commissioner of BCW Frank Marshall on August 23, 2024:

"After the assessment period [of Queens Central], in the first quarter of 2025, DSNY plans to announce the target dates for the rollout of all remaining zones. Our goal is to provide realistic and informed dates, ensuring a smooth transition based on the lessons learned from Phase 1."

2. We strongly support the establishment of a CWZ working group, as proposed within Intro number 352, primarily sponsored by NYC Council Member Sandy Nurse. Consistent and reciprocal feedback will only heighten the DSNY's oversight of critical challenges affecting customers and Awardees, unify the distribution of consistent customer-facing information, and streamline Program-related issue resolution pertaining to customer questions, data integrity, and operational quandaries.

3. Effective customer education will dramatically improve transition period efficacy. Every business across the five boroughs is impacted by the CWZ Program. While Awardees consider the transformation daily, local NYC businesses may not understand the Program's implications until an Awardee's sales rep attempts to solicit their business. We believe it is critical for the DSNY to strengthen their customer education efforts and work in unison with Awardees to avoid confusion during transition periods.

Over one year has passed and only one zone has been implemented since Awardees executed their agreements with the DSNY. To avoid further financial and operational burdens associated with a lack of Program-related information, we strongly urge you to share a "roadmap" for Program implementation and elevate a partnership with Awardees moving forward.

We thank this committee for its commitment to New York City's customers and look forward to continuing a conversation on how we can work together to seamlessly implement the CWZ program. Please do not hesitate to reach out to continue this conversation.



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Testimony to Committee on Sanitation and Solid Waste Management

April 23, 2025

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Council Member Shaun Abreu, Chair New York City Committee on Sanitation and Waste Management

Thank you to Chair Abreu and members of the Sanitation and Solid Waste Management committee for the opportunity to provide testimony today

My name is Jenille Scott and I am the Climate Director at ALIGN: The Alliance for a Greater New York. We bring together labor, climate, and community for a more just and sustainable New York, and I am writing as one of the lead organizations of the Transform Don't Trash (TDT) Coalition. The Transform Don't Trash NYC coalition is dedicated to transforming New York City's commercial trash industry by reducing waste and pollution, fostering clean and healthy communities for all New Yorkers, and creating better working conditions and good jobs for our state's workers.

Our coalition has been doing this work for over 10 years and 6 years ago, we advocated for the passage of the Commercial Waste Zone law (LL199 of 2019) which mandates the Department of Sanitation (DSNY) establish 20 commercial waste zones across all boroughs and enforce more rigorous safety standards for awarded carters. As of today, only 1 of 20 zones has been launched with DSNY today announcing plans to launch 2 zones this year with full implementation by 2027. Even though it is good to finally have a defined timeframe, this is still a delayed timeline and does not seem tied to any actual issues or negative responses from the first zone which the Department has referred to as a 'pilot program'.

LL199 is already 6 years delayed and this will add an additional 2 years bringing it to a grand total of 8 years to establish all zones and this is assuming DSNY sticks with this proposed timeline. Sanitation remains one of the most hazardous occupations with workers driving all night (up to 12 hour shifts) to collect waste in multiple boroughs using inefficient routes in poorly maintained trucks which has led to serious and in some cases fatal injuries. Our own research shows that there have been [103 incidents](#) between 2022 and 2024 with 3 fatalities. Additionally, emissions from these trucks not only contribute to our worsening climate crisis, but to the degradation of our communities' environments and health by worsening air quality in already overburdened communities.

This should not be the case 6 years after the law has been passed and this administration needs to do and can do better. We are not asking for all zones to be

Community
Voices Heard

Jose Lopez
*Co-Executive
Director, Make
the Road NY*

implemented at once but we are asking for them to be implemented in our lifetime. The longer DSNY takes to implement this law, the more environmental harm is perpetuated and the more workers and pedestrians alike risk serious injury daily. This law was never intended to be a pilot program because it was developed bearing in mind the daily impacts communities and workers face.

Thank you for the opportunity to raise our coalition's concerns regarding continued waste inequity in our city. We look forward to working with the City Council and DSNY to implement the remaining zones and to ensure the highest possible environmental, safety, and customer protection standards across the new waste system.

Sincerely,

Jenille Scott



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**Testimony of Justin Wood, Director of Policy
at New York Lawyers for the Public Interest to the New York City
Council Committee on Sanitation on April 23, 2025**

Good afternoon, Chair Abreu and members of the Council. My name is Justin Wood, and I am the Director of Policy at New York Lawyers for the Public Interest (NYLPI). We appreciate the opportunity to testify today, during Earth Week, on a critical climate, environmental justice, and public health law.

1. Following the successful rollout of the first commercial waste zone, now is the time to expand the program citywide.

Even as the Trump Administration seeks to reverse progress on climate and environmental justice, New York City can substantially reduce greenhouse gas emissions and air pollution while creating good jobs by following Local Law 199 and rapidly expanding the successful commercial waste zones system. While solid waste is a major contributor to New York's greenhouse gas emissions – estimated to be 11% of the state's total, about 80 percent of DSNY-managed waste still goes to methane-producing landfills and incinerators² and the amounts of waste generated, disposed, and recycled by the sprawling commercial sector are still not known and are largely unregulated pending full implementation of the Commercial Waste Zones (CWZ) system.

Just this morning, we learned that while DSNY will implement two additional zones in the Bronx by October 1, 2025, the transition to the CWZ system citywide is now delayed until the end of 2027. **Every month of delay is a missed opportunity to make our streets safer, our air cleaner, and keep workers safe in the private sanitation industry.** The sooner this program is implemented across all 20 zones designated by Local Law 199, the sooner New York's private waste companies, businesses, and their customers can begin recycling more, donating more usable goods, breathing cleaner air on safer streets, and creating good sustainable local jobs in the waste collection, recycling, and re-use industries.

2. We support Intro 1228 (Abreu), which would expand organic waste recycling rules as part of a citywide campaign to reduce the disposal of organic waste.

Reducing the massive quantities of organic food waste disposed in landfills and incinerators should continue to be a primary focus for DSNY and all of local and state government, across both the commercial and residential sectors. Requiring all commercial businesses to source-separate and recycle organic waste would substantially increase diversion while allowing the City to simplify public messaging to promote a single set of recycling rules and behaviors for New Yorkers at work, at home, at school, and commercial businesses and public spaces.

Commercial organic waste is also relatively “low-hanging fruit” in a citywide waste reduction strategy – there are far fewer business waste generators than in the residential sector, and consequently each business generates comparatively greater quantities of waste than individual households or consumers.

3. Local Law 199 Implementation must prioritize Environmental Justice.

Solid waste management remains one of the most grossly unequal burdens in New York City, with just a handful of overburdened community districts handling almost 75% of commercial waste via clusters of truck-based, private transfer stations.

Local Law 199 requires DSNY to collect and report on data including vehicle miles traveled; locations of transfer stations and recycling facilities used by designated carters; and modes of transport used by these facilities. The law further requires designated haulers carters to adhere to waste reduction, waste management, and sustainability plans submitted and approved by DSNY as part of the RFP process.

Both the rollout of a citywide CWZ system and new 20-year Solid Waste Management Plan due in 2026 are major, historic opportunities to reduce disproportionate quantities of commercial waste trucked in and out of environmental justice communities by:

- Utilizing existing marine and rail facilities to handle commercial waste and recyclables.
- Investing in new aerobic composting facilities similar to DSNY’s Staten Island facility that can process source-separated commercial and residential organic waste within the five boroughs and reduce both greenhouse gas emission and diesel truck miles. Potential sites should include Rikers Island as envisioned in the Renewable Rikers Act;
- Constructing a marine transfer station for recyclable materials collected in Manhattan. The current SWMP planned for such a facility on the Gansevoort peninsula in the Hudson River Park, but plans have been abandoned in the City’s most recent SWMP updates.

Our planet and our society are at a critical tipping point. We applaud the Chairs of the Sanitation Committee and many members of this council who have pushed City Hall and DSNY to follow the mandates of our climate, environmental justice, and public health laws, and urge you to consider additional legislation to mandate a date certain by which DSNY must complete Local Law 199 implementation.

We look forward to working closely with the Council and DSNY to make our City's climate and equity targets a reality for New Yorkers.

Justin Wood

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For almost 50 years, NYLPI has fought to protect civil rights and achieve lived equality for communities in need. Led by community priorities, we pursue health, immigrant, disability, and environmental justice. NYLPI combines the power of law, organizing, and the private bar to make lasting change where it's needed most. Our Environmental Justice Program works to eliminate the unfair burden of environmental hazards borne by low-income communities and communities of color and seeks to create a more equitable and sustainable city.

For more information visit: www.nylpi.org

**NEW YORK CITY COUNCIL
SANITATION AND SOLID WASTE MANAGEMENT COMMITTEE
CWZ OVERSIGHT HEARING**

**TESTIMONY OF DAVID BIDERMAN
BIDERMAN CONSULTING, LLC
April 23, 2025**

My name is David Biderman and I am the President of Biderman Consulting, LLC, a solid waste consulting firm. I am testifying to provide an update to the Committee concerning the safety-related aspects of the Department of Sanitation's (DSNY) Commercial Waste Zone (CWZ) program.

I currently serve three important functions relating to CWZ. First, I am the sole industry representative on DSNY's CWZ Safety Task Force. Second, I've provided safety training to numerous awardees and BIC licensees over the past few years. Third, I provide strategic guidance to several licensees trying to navigate the opaque solid waste landscape imposed by CWZ, and help them evaluate the future of their family businesses.

The CWZ Safety Task Force has started to meet regularly, and several subcommittees have been formed to explore specific topics. There is strong collaboration between DSNY, the BIC, DOT and myself on the Task Force and in the subcommittees, and I look forward to our continuing collaboration to help make solid waste collection safer both for the workers and road users such as pedestrians, bicyclists, drivers, and others.

CWZ requires all awardees to provide a certain amount of classroom training to front-line employees such as drivers and helpers. I have been providing such training since early last year, and also provide safety training to other companies in New York City. These efforts are making a difference. In the late 2010's, there were up to 3 worker fatalities each year in New York City. In contrast, there has not been a single private sector licensee worker fatality for the past several years. This is because nearly everyone in the private sector solid waste industry takes safety very seriously. The rhetoric by special interest groups about the lack of safety in the industry is outdated and does not reflect the current focus by the majority of licensees. Also, the data cited by these groups is misleading, as it includes construction and demolition (C&D) companies regulated by the BIC but do not collect trash or recycling. Although collisions still occur occasionally, the BIC recently reported to the CWZ Safety Task Force their frequency is declining, and often are caused by other vehicles being driven in violation of the law.

In addition, I want to remind the City Council and DSNY that CWZ has created winners and losers among the companies in the industry. Numerous companies applied for zones and did not receive any of them. Some of them are multi-generational family-owned businesses who have faithfully served commercial customers in New York City for decades. Because DSNY is not sharing any information about the timing or pace of CWZ implementation, companies have no idea whether they can stay in business for another 6 months or for 3 more years. Due to this lack of transparency regarding the CWZ implementation schedule, many owners are selling their businesses to awardees, and the pace of these acquisitions is accelerating. I urge the Chair to inquire with the BIC concerning the number of licensees who have exited the industry over the past 18 months. It is imperative, for both awardees and non-awardees, as well as the 100,000+ businesses in New York City, for there to be more transparency about when CWZ will be implemented throughout the five boroughs. Awardees need to plan purchases of trucks and hiring of personnel. Non-awardees need this information to develop an exit strategy or seek to become subcontractors to awardees, and deserve the opportunity to maximize the value of their business before CWZ puts them out of business.

Finally, a word about e-bikes. They are a menace to the drivers and helpers who collect waste and recycling in New York City. They are dangerous, crashing into and killing, and in frequent violation of the law. Please encourage NYPD and others to enforce existing traffic laws on them.

Thank you.

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March 25, 2025

Testimony of the Columbus-Amsterdam Business Improvement District (BID) regarding DSNY Budget & Containerization

My name is Daniel Bernstein & I am the Executive Director of the Columbus-Amsterdam BID. Thank you to DSNY for allowing me to testify & for their hard work keeping NYC clean every day. NYC BIDs vary greatly in size & budget, Our BID, a local community development nonprofit, has been in operation since 1987 & our boundaries cover both Columbus & Amsterdam Avenues from West 96th Street to West 110th Street (Bloomingdale neighborhood of Manhattan). We provide programs & services aimed at making our neighborhood cleaner, safer & more prosperous. Our sanitation “Clean Team” is comprised of 6 part time employees, 3 of which are deployed daily to sweep the streets & change the trash liners in the BID from 7AM-12PM.

I have worked in NYC BIDs for nearly 30 years & BID sanitation services are essential to NYC neighborhoods because as we all know DSNY & the City cannot clean all of NYC on its own. Local community development organizations, like BIDs, throughout NYC pick up the “major” slack of NYC & its agencies & make our City a more attractive place for visitors & residents alike.

The new DSNY rules regarding containerization will force many community groups like us to significantly alter &/or suspend their existing sanitation services due to the overwhelming financial constraints this rule is causing. This will result in overflowing trash receptacles, dirty sidewalks & illegal dumping. Additionally, the City is planning to fine organizations like us for doing the their job bagging PUBLIC trash (not BID or commercial trash, Yes public trash). This does not make any sense as it is the work of groups like ours that make New York City look great.

Our BID produces 40-50 trash bags per day & we will need 6 locations for containers within our BID which will cost us \$35,000-\$40,0000 to implement. This does not include staff time & maintenance, which will cost an additional \$50,000 annually (to comply with new DSNY rules). We strongly urge DSNY & the City to revisit this & make funding available for community groups & BIDs to comply with these new regulations.

Daniel J. Bernstein
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April 23, 2025
Testimony on Behalf of GreenFeen OrganiX and NYC Microhaulers
NYC Committee on Sanitation & Solid Waste Management
Oversight Commercial Waste Zones

Thank you for the opportunity to submit testimony on behalf of GreenFeen OrganiX and the growing network of microhaulers across New York City. As a social enterprise and worker-owned cooperative based in the Bronx, we operate at the intersection of environmental justice, economic equity, and community empowerment.

Microhaulers like GreenFeen OrganiX represent a transformative opportunity to reimagine the materials management industry. By supporting and integrating microhaulers into the expansion of Commercial Waste Zones (CWZs), the City has a chance to send a bold message: that sustainability, equity, and local economic development are not mutually exclusive—but fundamentally interconnected.

As we work to scale up local processing capacity through community composting hubs and redemption centers, we are creating safer, more accessible consolidation points. These localized systems can reduce the need for long-haul trucking, decrease greenhouse gas emissions, and empower neighborhoods to manage their own materials in ways that reflect community values and environmental responsibility.

Coalition-wide observations and on-the-ground data have shown:

1. Recycling rates remain stubbornly low—Microhaulers provide targeted education, culturally relevant outreach, and consistent service that builds trust and increases diversion.
2. Truck emissions disproportionately affect EJ communities—As Microhaulers we rely on cargo bikes and low-emission electric vehicles, offering a cleaner alternative to diesel trucks clogging our streets and lungs. I do not want to miss the importance of amplifying this urgent public health concern we are faced with compounded by future climate emergencies. We must build resilience now or we will pay for it later with an increased strain on resources and delayed consumer participation.
3. Waste workers often face exploitative conditions—Our model is worker-owned and cooperative-led, offering fair wages, collective decision-making, and career pathways in green infrastructure.
4. Waste transfer stations are unfairly sited in low-income neighborhoods—It's time to reverse that pattern with reinvestment into community-controlled composting and recycling infrastructure across the city. But to build, we need access to land and implemented waste equity policies.

The CWZ system must be more than a reshuffling of contracts. It must be a vehicle for justice and treated as a mechanism that will drive economic growth within New York City. The integration of microhaulers is a step in the right direction—toward circular economies, clean air, and community power.

Don't let waste be a burden that buries our dreams
Expand commercial waste zones toward equity streams
The Bronx up, we got next since the powers that be
Decide that we are worthy for developing
In N-Y-C, we keep it clean
Home grown in fact
Worker-owned how we move
Green jobs in tact
It's the law, can we move to improve the conditions
Replicating good faith...with tangible decisions

Thank You



**Testimony on behalf of the
Manhattan, Brooklyn, Queens, and Bronx Solid Waste Advisory Boards**

before the New York City Council
Oversight Hearing on Commercial Waste Zones (LL 199)

April 23, 2025

Thank you for this opportunity to testify on behalf of the Bronx, Brooklyn, Manhattan, and Queens Solid Waste Advisory Boards about implementation of Local Law 199 of 2019, which established the Commercial Waste Zones. First, we want to say that we support Chair Abreu’s Intro 1228, which moves the needle on fulfillment of NYC’s Zero Waste laws and NYS’s Climate Leadership and Community Protection Act by keeping more organics from commercial waste out of landfills and incinerators.

We were pleased to hear at the recent Preliminary Budget hearing before the Sanitation Committee, DSNY’s assertion that in the one zone where Local Law 199 has been implemented there have been no complaints from customers. However, the law was supposed to be fully implemented a year and a half ago and is currently only in the initial phase rollout. Reporting on the implementation of this initial phase rollout has been sparse. Now is the time to look at the data from the required reporting and move to full implementation. Despite the obstacles that haulers face in making this transition, we know that to implement this law fully – which the Solid Waste Advisory Boards strongly support – it was always anticipated that commercial hauling fees could go up, and that inefficient haulers would need to become efficient, merge with more efficient haulers, or shut down. Per Local Law 199, none of this is up for debate, study, litigation, or requests for further delay of full implementation.

The CWZ legislation also requires the option for diversion of organics and recyclables from landfills and incinerators. Customers in the CWZ receive the incentive of a lower rate for the collection of their source separated organics (SSO) and recyclables. What specific data about progress toward diversion is DSNY collecting in the initial phase rollout? Have the diversion rates for organics and recyclables, and types of recyclables diverted, increased in the initial phase rollout where there are pricing incentives and requirements to do so? Are the incentives in Local Law 199 enough, or do we need stronger mandates,



such as those proposed in Intro 1228? At present, DSNY has not made commercial data publicly available to enable anyone to check on whether the incentives to source separate are working. We recommend that these data be made publicly available immediately and be updated on a regular basis.

Local Law 199 is supposed to reduce truck traffic across the city through the implementation of all 20 Commercial Waste Zones, and the use of other transportation modes, such as marine transport. Yet DSNY's 2024 Waste Equity Report¹, which also includes brief reporting on the CWZ, mentions only permitted tonnage that is unused as a reduction in truck traffic. The SWABs would like to know what is the reduction in truck miles traveled and GHG emissions as a result of the initial phase rollout? How many companies in the initial phase rollout are using alternatives to truck transport, and what is the reduction in truck miles and GHG emissions from the use of alternative transportation modes? What has DSNY done to incentivize the use of alternatives to truck transport, including incentivizing the use of its own marine transfer stations?

Despite the success of the Waste Equity Law in reducing tonnage in overburdened communities, it has become clear during the initial phase rollout of Local Law 199 that there is ongoing overburdening of these communities. This includes the lack of full implementation of the CWZ law in all zones, which means, for example, New Yorkers who live in the other 19/20's of NYC are not benefiting from the improvement to community air, pedestrian and worker safety, and enforcement. Another problem is that while haulers in a CWZ are geographically constrained in where they can make collections, drop-offs at transfer stations are constrained only by the transfer stations' DEC-permitted capacity and any reductions in tonnage imposed by the Waste Equity Law (LL 152 of 2018). Also, Construction & Demolition Debris (C&D) is exempt from the CWZ Law. The bottom line is that the same residents living with transfer stations continue to be disadvantaged under the CWZ Law when it comes to, for example, truck traffic, pedestrian and worker safety, and pollution of their community air and environment.

1

<https://www.nyc.gov/assets/dsny/downloads/resources/reports/waste-equity-law/2024/waste-equity-report-2024.pdf>



Furthermore, the CWZ, Waste Equity, and Zero Waste Laws need to be integrated into the 2026 Solid Waste Management Plan. This offers an opportunity to transparently include structured measures, actions, commitments, and timetables in each year of the plan to fulfill these City laws, as well as the New York State Climate Leadership and Community Protection Act. Also needed is crucial input from the City Council's and Borough Presidents' Offices' internal experts, the Solid Waste Advisory Boards, and communities that continue to be overburdened by transfer stations, trucks, and community air pollution, including those supporting Council Member Sandy Nurse's Intro 0352-2024, in relation to creating a commercial waste zones working group. A handful of people working in isolation will not yield the most effective results. Thank you.



Regarding Commercial Waste Zones and Intro 1228

Good morning. My name is Kathleen Irwin, and I am the NYC Government Affairs Manager for the New York State Restaurant Association (NYSRA). We are a trade association representing food and beverage establishments in New York City and State. We are the largest hospitality trade association in the state, and we have advocated on behalf of our members for 90 years. We represent independent restaurant operators as well as chain brands, including both corporate and franchise models, across the five boroughs.

Thank you to Chair Abreu and the Committee on Sanitation and Solid Waste Management for holding today's hearing and providing an opportunity to discuss the implementation of Commercial Waste Zones (CWZ). When Local Law 199 passed back in 2019, the top priorities for NYSRA were that restaurants across the five boroughs would retain some degree of choice, and that cost would be taken into strong consideration during both the rulemaking process and the awarding of licenses. These remain the substantive priorities of NYSRA as CWZ implementation continues across the city. As with any regulatory change, we also highly value ample and advance outreach to restaurants, giving them the opportunity to prepare and plan with foresight, and education-based enforcement, giving them opportunities to cure.

As the process to phase in CWZ has begun, having a predictable timeline for the remainder of the zones is a top priority for restaurants. As of yesterday, April 22, the "Rollout Schedule" tab on the DSNY CWZ website still only mentions the Queens Central zone, over four months after the phase-in has completed. It is extremely important for restaurants in the other 19 zones around the city to know when to expect their CWZ phase-in so they can plan accordingly. Another area of confusion we are hearing from restaurants is related to the role of subcontracting in CWZ. Restaurants have found their zone and identified the carters awarded licenses, only to hear from a different company that they intend to subcontract in that zone. We are eager to hear how subcontracting is playing into the CWZ transition so far in Queens Central, and would like to see more transparency about subcontractors so that restaurants have a reliable source to refer back to and confirm which companies are actually subcontracting in their zones. Furthermore, we would like to see any data that DSNY has collected in Queens Central regarding price – final negotiated price, rather than maximum rates – so we can better understand and predict the cost implications of CWZ in the rest of the city. If that data does not yet exist, we encourage DSNY to seek it out. Finally, we would like to re-emphasize the need for education on the transition to CWZ, especially because the law authorizing CWZ was passed several years ago and is no longer front of mind for business operators.

Regarding Intro 1228, we understand that the proposed expansion of commercial organics mandates is meant to go along with the residential composting mandate. We know there is a cost incentive under CWZ to source-separate because commercial organics are required to be cheaper on a unit basis. If a city-wide restaurant mandate for commercial organics is the goal the

city wants to reach, we agree that this should be timed to coincide with CWZ phase-in so that restaurants are only covered when they are 1) already reassessing their private hauler, 2) choosing amongst haulers who are required to provide commercial organics service, and 3) benefitting from a cost incentive to source separate. With that said, we feel there should be a lengthy education period and opportunities to cure, as we expect a serious learning curve in the uptake of commercial organics source-separation for independent operators who have not been covered by commercial organics mandates in the past. We also recommend that DSNY provide training about how to source-separate and assist businesses in obtaining appropriate commercial organics receptacles to best facilitate compliance for independent restaurant operators.

Thank you for taking the time to consider our input today. Above all, we hope that our request for an advance predictable rollout schedule for the remaining CWZ will be prioritized by this Committee and DSNY. As always, we intend to continue to be a partner to the Council in this important work, and to help create a fair and transparent commercial waste environment for restaurants in New York City.

Respectfully Submitted,

Kathleen Reilly Irwin
NYC Government Affairs Manager
New York State Restaurant Association
401 New Karner Road
Albany, New York 12205

April 23, 2025

NYC Hospitality Alliance comments to the NYC Council Committee on Sanitation and Solid Waste Management on:

- [Int. No. 784](#) - in relation to establishing a tracking system concerning the disposal of yellow and brown grease
- [Int. No. 1228](#) - in relation to expanding the categories of businesses that may be subject to requirements regarding the disposal of commercial organic waste

The NYC Hospitality Alliance is a not-for-profit association representing thousands of restaurants, bars, and nightclubs across the five boroughs and we submit the following comments.

Lack of Outreach – It is imperative that bill sponsors meet with industry stakeholders before introducing legislation impacting our industry. Outreach promotes the necessary partnership between the industry and the City Council, fosters dialogue, and produces better laws. Unfortunately, none of the sponsors of this bill reached out to us before introducing these bills. We find that regrettable.

[Int. No. 784](#) - in relation to establishing a tracking system concerning the disposal of yellow and brown grease, while well-intentioned, does not have our support, for the following reasons.

1. **Overlaps with Existing Obligations** – Bars and restaurants are already required under existing reporting obligations to disclose data concerning yellow grease to the Department of Sanitation. This bill would impose an overlapping requirement that the same data be reported to the Business Integrity Commission. Why?
2. Why introduce yet another reporting requirement now for brown grease? This adds to the growing list of small business mandates, increasing administrative burdens and exposing restaurants to additional fines—especially when penalties already exist for improper disposal.
3. If there are issues with the companies responsible for collecting and disposing of brown grease, the City should address those directly. Restaurants and bars, already navigating numerous challenges, should not be held accountable for failures outside their control.

[Int. No. 1228](#) - in relation to expanding the categories of businesses that may be subject to requirements regarding the disposal of commercial organic waste. while well-intentioned, does not have our support, for the following reasons.

1. In advance of this public hearing on we surveyed the operators of 501 restaurants and bars on a proposed mandatory composting requirement.
 - a. Key survey findings:
 - i. **86% of restaurants and bars** report a **lack of space and logistical capacity** to comply, **effectively setting the stage for challenges and conflict** within the industry.
 - ii. **80%** of respondents do **not support** a composting mandate for all establishments.

- iii. **79%** said such a mandate would have a **severe or moderate negative impact** on their operations.
 - iv. Common concerns included increased costs, lack of space, and logistical challenges.
 - v. While some businesses support composting, and we hope it is aspirational for others, it's clear a **one-size-fits-all mandate is widely opposed** by small businesses.
2. Instead of imposing another regulation, the City should focus on **supporting and incentivizing voluntary composting**, giving small businesses the help they need in an already difficult environment. In fact, we are soliciting insights and best practices from restaurants that currently compost and will share it with other restaurants and to assist and encourage them to compost.
 3. The new Commercial Waste Zones law has not yet been fully implemented, creating ongoing uncertainty for bars and restaurants. Once active in their area, small businesses will be required to choose and contract with new private carters—adding complexity, administrative burdens, and thus adding a composting mandate on top of this adds more challenges.
 4. While restaurants and bars can train their staff on composting, the public often struggles to follow proper sorting guidelines. This creates challenges in limited-service restaurants where customers dispose of their own waste—leading to contamination and forcing employees to sort through bins to avoid fines for improper disposal.
 5. Many restaurants and bars continue to struggle with the new containerization mandate due to limited indoor storage and/or the need to place large waste bins stored in front of their storefronts. Adding a composting requirement would introduce even more containers, further complicating space and logistical management.

More mandates, more fines – Once again, the Council has devised a well-intentioned bill that creates more mandates on small businesses, and threatens more fines. Despite appearances, those who are familiar with our industry know that it is under enormous financial strain. Just in the realm of sanitation alone, bars and restaurants are contending with containerization, zone collection, composting for some businesses; and proposals to expand composting to all businesses, changes to the bottle collection laws, etc., etc., etc. All of which come with fines that amount to death by a thousand cuts. What our industry needs now is a period of repose – a break from the relentless stream of new mandates and fines – so small businesses can catch their breath and regain stability.

We remain open to speaking with any Member of the City Council who wishes to engage our industry on these two topics, but as drafted, we have no choice but to voice our **opposition** to these bills.

Thank you for your consideration of our comments. If you have comments or questions please contact our Executive Director, Andrew Rigie at arigie@thenycalliance.org.



**Testimony of Alia Soomro, Deputy Director for New York City Policy
New York League of Conservation Voters
City Council Committee on Sanitation and Solid Waste Management
Oversight Hearing on Commercial Waste Zones
April 23, 2025**

My name is Alia Soomro and I am the Deputy Director for New York City Policy at the New York League of Conservation Voters (NYLCV). NYLCV is a statewide environmental advocacy organization representing over 30,000 members in New York City. Thank you, Chair Abreu, as well as members of the Committee on Sanitation for the opportunity to comment.

One of [NYLCV's top policy priorities](#) is getting us closer to our zero waste by 2030 goals. Food waste is the third largest source of New York City's overall emissions according to the City's [integrated NYC Greenhouse Gas Inventory](#), after buildings and transportation. Twenty percent of New York City's greenhouse gas emissions come from household food consumption. When food waste is sent to landfills, which are disproportionately located in low income and communities of color, organic waste decomposes to create methane gas, a powerful greenhouse gas more than twenty times more potent than carbon dioxide. Neighborhoods near polluting facilities like waste transfer stations and incinerators have higher rates of pollution, which cause disproportionately higher cases of asthma, cancer, and other health issues and compound already existing environmental and racial inequities. Due to these environmental injustices—which are only being compounded with the impacts of climate change—the City needs to be doing everything in its power to continue moving towards organic waste recycling, including allocating robust funding for these programs.

NYLCV strongly supported the passage of Local Law 199 of 2019, establishing the City's first Commercial Waste Zones (CWZ) program. Championed by a wide group of stakeholders, this law will overhaul the City's antiquated and inefficient commercial waste management system by dividing the City into 20 zones, limiting each zone to a maximum of three private sanitation companies selected through a competitive bid process and holding companies to higher standards.

Although the first waste zone ("Queens Central") [officially began this January](#), DSNY must timely implement the nineteen other CWZs throughout the city. While we understand the importance of starting off on the right foot and learning from Queens Central, along with other cities' attempts at overhauling its waste system, it is imperative that the City carries out this law in a timely and transparent manner given the fact that it's been over five years since the law was passed. We urge the City to release a list of the next CWZs that will be implemented and a firm timeline for when all CWZs will be operational.

While it has taken the city far too long to get to this point for such a common sense policy, if implemented in a comprehensive, timely, and transparent manner, the CWZ law will bring New York City closer to its zero waste goals and improve the safety of workers, pedestrians, and cyclists. It will also cut down on traffic congestion, improve air quality, and curb the city's tailpipe pollution and carbon emissions, which is especially important in low-income communities and communities of color.

We also call on the City to provide continued funding for the electrification of light-, medium-, and heavy-duty DSNY and commercial sanitation trucks. Additionally, the City must continue working with DCAS, utility companies, and industry professionals to ensure adequate charging infrastructure is installed and available for sanitation trucks and give extra consideration for CWZ carters with the most aggressive plans to do so. Requiring cleaner fleets as part of the City's move to CWZs is also the best way to bring measurable air quality improvements to neighborhoods that house a disproportionately high number of haulers and waste processing facilities. It is not good enough to require citywide emissions reductions. We should also strive for more localized benefits.

When it comes to organics collection, NYLCV is extremely disappointed by [the Adams Administration decision to stop issuing fines to most buildings that break composting rules](#) for the rest of the year. This is short-sighted and goes against Local Law 85 of 2023. This was a bill that was on our Council Scorecard and it is now a law that we are very supportive of. If we are to achieve our zero waste goals and improve quality of life, DSNY needs to robustly enforce this law *and* conduct robust outreach and education in multiple languages. At the very least, we hope that with this pause, it means DSNY will ramp up the outreach and education it's doing to buildings throughout the city. We also hope that enforcement will begin again.

On that note, as the CWZ law is implemented and the citywide residential curbside organics program continues, we hope these two programs will be coordinated so that New Yorkers can start composting comprehensively, whether in residences or businesses. NYLCV supports [Intro 1228 of 2025](#), sponsored by Council Member Abreu, which would expand the categories of businesses that can be designated by DSNY to be subject to requirements regarding separation and disposal of organic waste. Any covered establishment so designated would be required to comply with requirements regarding separation and disposal of organic waste when the commercial waste zone in which the establishment is located goes into effect, or within 6 months from DSNY's designation if the commercial waste zone was already in effect. If we are to make any dent in our zero waste goals, we need the commercial sector to play its part in composting organic waste.

With a climate-denying presidential administration aggressively cutting climate and environmental funding and rolling back numerous environmental laws, zero waste and, more specifically, Commercial Waste Zones, is an area where the City can and should take leadership. While we are glad the first CWZ has officially begun, we urge the City to make

progress on the nineteen other zones so that New York City can strive towards our zero waste goals, enhance worker and pedestrian safety, and improve our quality of life.

Thank you for the opportunity to comment.

REBNY Testimony | April 23, 2025

The Real Estate Board of New York to The City Council Committee on Sanitation and Solid Waste Management on Commercial Waste Zone Oversight and Int. 1228-2025 on Commercial Composting

The Real Estate Board of New York (REBNY) is the City's leading real estate trade association representing commercial, residential, and institutional property owners, builders, managers, investors, brokers, salespeople, and other organizations and individuals active in New York City real estate. REBNY appreciates this opportunity to testify on the rollout of the Commercial Waste Zone (CWZ) program and on Int. No. 1228, which would expand the number of businesses that will be required to recycle organic waste.

Oversight: Commercial Waste Zones

REBNY has been an active participant in the CWZ development and implementation process and supports the goals of decreasing truck miles, better public safety and air quality, and responsible labor practices as these matters pertain to the management of commercial waste. At the same time, we have expressed concerns that the CWZ program would limit competition among carters in a way that will erode the quality of carting services and raise costs for businesses. As commercial property owners, our members must receive high quality waste management and recycling services from their vendors or else the city will be left with unsanitary and unsafe conditions in public spaces.

With this in mind, we look forward to hearing from the Department of Sanitation (DSNY) about the initial roll out of the CWZ program in the Central Queens zone. Given the significant changes that will occur under the CWZ program, it is critical that DSNY appropriately evaluate the rollout in this zone before expanding to other zones.

It is particularly important that DSNY pay close attention to the consolidation that is occurring in the commercial waste hauler sector, which is coming about in part because those selected to service one or more zones are buying out companies who did not receive CWZ contracts. The

increasingly shrinking pool of carting companies threatens to leave building owners with few alternatives if service levels erode. Competition between carting companies is critical to maintain high quality service both before and after the CWZ program is implemented.

Int. 1228

REBNY supports increasing the collection of organic waste from commercial establishments. Under current law, requirements for commercial establishments to collect and compost organic waste are limited to entities that are both covered by the law and designated by the Commissioner of the Department of Sanitation. The designation of covered businesses, such as grocery stores, arenas, and wholesale food vendors, is left to the discretion of the Commissioner as the designation is in large part based on costs and the capacity of compost facilities in and around New York City to accept organic waste.

Int. 1228 would drastically increase the number of businesses that would qualify as covered by the law. The legislation would further require the Commissioner to annually designate additional businesses to compost “notwithstanding” an analysis of the costs of doing so and area capacity to process this waste stream.

Any expansion of collection requirements must be done after careful evaluation of the impact of such a mandate on businesses and the ability of the City to appropriately handle the additional organic material. These practical considerations must guide DSNY’s efforts and cannot be ignored.

Thank you for considering these views.

CONTACT:**Dev Awasthi**

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Committee on Sanitation and Solid Waste
NYC City Council Budget
Support Community Compost Budget

Colin Cannon

New York Harbor School

March 25th 2025

Dear David Carr,

Thank you for supporting community composting. As a student at New York Harbor school we've learned how community composting works and how important it is for the city. Community composting is vital to the city and overall world's well being. We strongly urge you to consider expanding community composting funding so they themselves can expand the space and equipment they have and possibly make the process faster and more convenient. Where I live in Bay Ridge I have seen no form of composting. My building does not even have a municipal "composting" bin which isn't even actually composting even though it's mandated by law. We still need to educate people on what composting is. Compost is not old fruit, compost is the finished product. But the majority seem to think it's just smelly old food.

As of now what the city has for official city wide composting is municipal waste collection which is gathered by those brown and orange bins and sent to waste treatment plants where it is then turned into biofuel and that is not what composting is. Community composting however is the collection of local waste given by the people that is then gone through the process that produces actual compost. Like I said , compost is the finished product, a fertilizer for plants made by decomposed natural materials. Biofuels are not compost and I'm not trying to say we don't need the biofuels we do but we shouldn't tell people that is composting like the bins say or even the apps name.

And speaking of those bins we could use those bins for both biofuels and composting. If we somehow found a way to split the waste so that some goes to local composting areas and the other goes to waste treatment plants. Then you get the best of both worlds and the bins won't be lying when they say composting. But I know that change won't be easy. And it would take time, patience and ideas. But I'm sure back in the late 19th century when the garbage pickup system was invented that also seemed difficult. And now we don't really have to think about garbage collection. And I feel there will be a time soon where composting is at the same level as garbage trucks are now. But that can only be a reality if the community cares enough to want it and if you kind people who helped us before would be willing to help again.

From: [Cynthia Kienzle](#)
To: [Testimony](#)
Subject: [EXTERNAL] 25-26 compost funding extension
Date: Monday, March 24, 2025 10:36:04 PM
Importance: High

Dear NYC's City Council Members:

I wholeheartedly support NYC's composting program.
For years, I have been taking my compost to bins in St. Vartan Park.
And to the Union Square Market.
And to the orange electronic bins on the street.
I am so looking forward to having a composting bin in my apartment building beginning this Spring.
None of this would have been possible if not for NYC's ongoing compost funding.
Composting needs to be made super easy for NYC residents.
We need to continue to grow the composting program in NYC to get to the point where it is as natural as recycling paper, glass/metal and plastic.
We all know why recycling food scraps is super important.
No reason to reiterate it all here.
In sum, **I totally support extending NYC's compost funding to Jun 20, 2026.**
Let's just do it!!!!
Why would you not?

Cynthia Kienzle
Murray Hill, New York City

Good morning. My name is Zhenia Nagorny and I co-lead the compost project at the Maple Street Community Garden in Brooklyn, NY.

First of all, on behalf of the garden, I would to personally thank all the council people who have believed in community composting and stood by this movement when the Administration cut most funding.

I am here because I believe that community composting should be included in the federal budget and request that \$11.5 million be reinstated to support this important network of organizations and countless individuals who believe in community solutions and organic food waste management.

Community composting has been essential in my work at the Maple Street Community Garden. I attended the Master Composter program in 2018 that was led by the NYC Compost project at the Brooklyn Botanical Garden. The education that I received there completely transformed my understanding of the science behind composting but also ways that we can manage the process in our urban environment. The network of mentors at the NYC Compost project were instrumental in helping to improve our process, help to build us compost bins, and grow a volunteer pool of 15 to now a steady 60 volunteers every season.

During covid in 2020 when Prospect Lefferts Gardens was scheduled to get the brown bins, the program was shut down completely. We immediately connected with Big Reuse and agreed to get our many thousand of lbs of scraps hauled to the Gowanus facility. Big Reuse staff were so supportive and helpful. Otherwise, we wouldn't be able to manage and process so much food scraps in our garden since all the public food scrap drop off places were closed indefinitely.

Why does community composting matter? Because it's a network of dedicated and passionate individuals and organizations who work together to minimize the impact of our organic food waste - 30% of all garbage is organics - on the landfill. Because instead of garbage going into landfills, we can recycle organic waste and make it into nut rich soil amendment that keeps gardens, tree beds and urban green spaces thriving. Because community composting helps to keep food scraps and organic waste local at community sites thus minimizing transportation and fuel costs and the compost that is made will stay and be used to benefit those communities. The capacity for local composting is needed and the requested funding will help to expand these much needed operations!

Being a part of the composting project at the Maple Street Community Garden has been an incredible experience for me and hundreds of volunteers that I've personally had the honor of working with. Being a Master Composter and having mentors to guide me has helped me to be a better leader, a better citizen and a better human being. This year, we have an unprecedented amount of participants in the Master Composter program and I know that together, we will create beautiful networks of support, education, advocacy and sustainability across NYC. Restoring funding for community composting as part of federal budget is instrumental in the momentum of our movement.

Please vote to restore all funding to community composting. Thank you for your time.

Zhenia Nagorny
Compost Co-Captain
Maple Street Community Garden

Dear City Council Members,

My name is Jesse Vogel and I am a volunteer at Maple Street Community Garden. I have been a resident of PLG since 2021. Over the past four years I have spent countless hours at the community garden, meeting neighbors and helping my community collect food scraps.

Firstly, I want to thank Rita Joseph and the other city council members that stepped in last year to save community composting. Without your work we would have lost everything. With that effort in mind, I am submitting testimony today to ask for the city to take the next big step: to restore funding for community composting, and to include it in the federal budget.

Every Saturday we collect hundreds of pounds of food scraps from neighbors. In order to process that much, our program relies on the partnerships we have with organizations like Big Reuse. We create a robust community resource that rebuilds our soil health, diverts waste from landfills, and moves our city one step closer to meeting our climate goals.

Not only are we helping the climate, but we're improving the lives of our volunteers and community members. Programs like community composting give myself and my neighbors access to critical third spaces, where we can gather, get to know each other, learn from one another, and share in the experience of doing good. It helps to create a vibrant community which is something we all desperately need at this time. To me, compost in NYC is as much about building healthy communities as it is building soil structure.

Thank you,
Jesse Vogel
Brooklyn

From: [Kamaj Bailey](#)
To: [Testimony](#)
Subject: [EXTERNAL] Written Testimony: Continued Funding for NYC Community Composting Programs
Date: Monday, March 24, 2025 8:12:02 PM

[REDACTED]

New York City Council
Committee on Sanitation and Solid Waste Management
City Hall, New York, NY

Dear Members of the City Council,

My name is Kamaj Bailey, and I am a resident of District 28 in South Ozone Park, Queens. I am writing today in strong support of continued funding for the NYC Community Compost Network, which has been instrumental in educating New Yorkers about composting, waste reduction, and environmental stewardship.

I am currently working toward my Master Composter certification and have had the opportunity to participate in a variety of hands-on experiences through the program. I first learned about the Master Composter program after taking a class with my mother, *Caring for Soils with Compost, Mulch, and Cover Crops*, at Queens Botanical Garden (QBG). We originally joined to troubleshoot our home tumbler system but were so inspired by what we learned from Lou Reyes, the Compost Project Manager at QBG, that we signed up for the full program immediately. Since then, I have taken the following courses at QBG - *Intro to Composting*, *Compost Advocacy & Community-Building*, and *Systems, Tools, and Scales* - and plan to take the remaining courses as soon as enrollment opens.

Beyond coursework, I have participated in various volunteer events, which have deepened my knowledge and engagement with the community. I toured the QBG compost site and saw a mid-sized windrow system in action, giving me firsthand insight into different composting methods. I volunteered at QBG on Compost Build Day and Compost Beautification Day, where I worked alongside other community members to support local composting efforts. Through QBG staff, I also connected with a community garden in my neighborhood and plan to volunteer with them soon. Additionally, I have contributed to urban composting efforts at Sky Farm in Long Island City, where I learned about their 3-bin system, and at The Rusty Wheelbarrow in Woodside, where I helped process organics and weather-treat wood planks for a new bin system.

These experiences have reinforced the vital role of community composting—not only in reducing waste but also in fostering local engagement, environmental education, and sustainability efforts. While the city's brown bin program is an important piece of the puzzle, I

firmly believe that local composting initiatives must also be prioritized and properly funded. Keeping composting within our communities allows residents to directly participate in the composting process, reduces the likelihood of food scraps ending up in anaerobic digesters (which can contribute to methane emissions when flare-ups occur), and creates more opportunities for education and green job training.

I strongly urge the City Council to continue funding the NYC Community Compost Network beyond June 30, 2025. This program is a critical resource that empowers residents, strengthens local food systems, and supports the city's broader sustainability goals. I would also love to see this program expanded into schools, particularly at the secondary education level, to raise awareness about composting, green jobs, and environmental stewardship.

Thank you for your time and for your ongoing support of community composting programs. I hope you will continue to invest in these essential initiatives for the benefit of all New Yorkers and our environment.

Sincerely,
Kamaj Bailey

Committee on Sanitation and Solid Waste
NYC City Council Budget
Support Community Compost Budget

Maria Martinez

New York Harbor School

March 25th 2025

Dear Sanitation and Solid Waste Committee,

Thank you Sanitation and Solid Waste Management and thank you to my city council member, Eric Dinowitz.

My building in the Bronx doesn't have access to compost, and the trash cans for my building are not labeled so people do not know where to separate their trash, this is why education is necessary, people need to learn how to compost

Community composting is a local process that involves collecting organic materials from a community. Municipal composting is a type of compost created from organic waste collected by local government or municipalities, such as food scraps, yard waste, etc. and then processed into soil amendment.

Community compost groups can support brown bins, smart bins, and traditional composting methods in several ways, community compost groups can promote the use of brown bins by educating residents on what can be composted and how to use the bins correctly. Community compost groups can advocate for the installation of smart bins in public areas and residential communities. Traditional composting methods involve the decomposition of organic materials in a controlled environment, Community compost groups can support this method by providing composting education, organizing workshops, and setting up communal composting sites.

Community composting and municipal composting are both essential for managing organic waste and promoting sustainable practices. Community compost groups play a crucial role in supporting various composting methods, including composting methods, including brown bins, smart bins, and traditional composting. By educating residents and managing composting initiatives, these groups can contribute to reducing waste and improving the environment.

Dear Committee on Sanitation and Waste Management,

I am writing to express my strong support for continued funding of community composting programs in our city. First, I would like to thank Councilwoman Rita Joseph and her fellow council members for their dedicated advocacy of community composting initiatives. Their support has been crucial in maintaining these vital environmental programs.

As a regular participant at the Maple Street Community Garden composting site, I have witnessed firsthand how these programs build community connections while diverting thousands of pounds of food waste from landfills. Our site alone processes over 25,000 pounds of food scraps annually, demonstrating the significant environmental impact of community composting.

I urge you to restore and include funding for community composting in the federal budget beyond June 2025. Without sustained funding, we risk losing vital drop-off sites, educational programs, and community networks that have taken years to build. These programs are essential for meeting our city's sustainability goals and fostering environmental stewardship at the grassroots level.

Community composting is more than just waste management - it's an investment in our city's environmental future and community resilience. Please ensure these valuable programs continue to receive the funding they need to operate and grow.

Thank you for your consideration,

Marselena Romero

From: [Martha Chapman](#)
To: [Testimony](#)
Subject: [EXTERNAL] Save Composting!
Date: Monday, March 24, 2025 6:30:10 PM

Dear Council members,

Community composting should be considered an essential part of the city's environmental goals and zero waste plan. It's important for me to see my council member supporting community-based, environmental programs that make it easy for us to learn more about composting (through the Master Composter and other programs), access local food scrap drop off sites, attend volunteer events that connect us to compost as a beneficial resource for our communities, and receive free compost for our neighborhood gardens and street trees.

Climate change is already here, as we've seen increasingly extreme weather patterns in NYC and across the globe. Especially with EPA cuts and climate change denial on the federal level, we must take action to combat the climate crisis however we can on the citywide and statewide level, including community composting.

Thank you for making these critical resources possible.

Martha Chapman

“Except for the point, the still point, there would be no dance, and there is only the dance.”
T.S. Eliot

[Martha's FB Page](#) [Martha's LinkedIn Profile](#)
[Omega Dance Company](#) [Find Omega on FB!](#)

From: [Shakira Provasoli](#)
To: [Testimony](#)
Subject: [EXTERNAL] Please continue with composting!
Date: Tuesday, March 25, 2025 6:33:22 AM

[REDACTED]

Hello I am writing to implore you to continue funding community composting! My building does not offer composting, and I have been collecting my compost ever since I have been able to drop off food scraps at a bin in my neighborhood in Tribeca. It is a routine I am used to, and I also know that the waste collected goes to helping gardens.

Please don't make me have to throw all that potential nutrients into the landfill!

Thanks for listening

Shakira Provasoli

March 24, 2025

To Whom it May Concern,

When I first moved to Brooklyn in the summer of 2020, one of the first things I did was walk over to my nearest Greenthumb Community Garden. I emailed the garden to ask how I could be involved, and I found out about the compost program there. Community composting is how I found a way to be outside, connect with nature, bond with my neighbors, and find community even during a pandemic. I met my first and now closest friend in New York at that garden – Maple Street Community Garden. Even when I moved apartments, I stayed close to Maple Street Community Garden because of the meaning that it brought to my life.

I'm writing to ask you to restore full funding to Community Composting. It is an essential part of my life and the lives of so many New Yorkers. Community composting teaches people how to reduce our waste, take care of the planet, give back to the earth, grow food, grow beauty, create community, and take initiative. It gives people hope and joy during hard times. It makes people laugh. It brings people outside where they can be active and healthy—rain or shine! It's one of the few instances where I can engage in an intergenerational group activity and meet people who live within a few blocks from me—people I would've never otherwise had a chance to talk to.

Just because the city has rolled out the brown bin program doesn't mean everyone knows how to use them! We need community composting to continue the essential education about why and how to compost. People don't just start to look at their waste differently overnight. It takes time, it takes conversations, friendships, and support. If we want the compost program to be successful in NYC, we NEED the community aspect. If you restore full funding to community composting, so many New Yorkers will be able to continue the environmental work that brings life to their communities and a sense of responsibility and action to their lives. And so many people will be able to continue to learn and join the network of composters around the city.

Community composting has meant so much to my life here in New York—it's made it unique from anywhere else I've lived. Thank you for your time, and I hope you can understand that this funding is invaluable. It's an investment by the city into its people, and the benefits are too numerous to number.

Sincerely,

Tiffany Yu

Compost Testimony

The community compost network is a vital part of New York City's sustainability efforts, providing residents with accessible, local options for composting food scraps and diverting waste from landfills. Organizations like **the New York Botanical Garden, the Lower East Side Ecology Center, Earth Matter, Big Reuse, and BK Rot** have played a critical role in making composting a community-centered, educational, and effective practice. These groups not only process organic waste but also engage the public in environmental stewardship, offering workshops, volunteer opportunities, and resources that empower New Yorkers to reduce waste and support healthy soil ecosystems.

Despite strong public interest and the dedication of volunteers and staff, NYC's composting infrastructure has faced setbacks in recent years due to **political decisions**, not a lack of participation or commitment. Cutting funding for these essential programs goes directly against the city's stated commitment to making New York greener and safer. The community compost network diverts tons of organic waste from landfills, reduces greenhouse gas emissions, and strengthens local food systems by creating nutrient-rich compost. **Defunding these initiatives actively undermines efforts to build a more sustainable city** and disregards the overwhelming demand from residents who want to see composting expanded, not restricted.

A commitment to composting is a commitment to a greener, more sustainable New York. By funding and supporting community compost organizations, the city can continue to reduce waste, enrich local soils, and empower residents to take an active role in environmental solutions. These groups are the backbone of NYC's grassroots sustainability movement, and ensuring their longevity is key to building a more circular and regenerative future for our city. Cutting support now would be a major step backward, contradicting the very environmental values that New York claims to uphold.

Community composting is essential to New York City's environmental goals and zero waste plan. I strongly urge City Council to continue funding the community organizations who do this important work in FY26, and consider expanding funding to more community composters. The programs you're funding keep millions of pounds of organic waste from the landfill and return compost to the community.

Save Our Compost

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Brooklyn Borough President

Address: Antonio Reynoso

I represent: _____

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Bonacio Crespi

Address: _____

I represent: Local 813

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: JUSTIN WOOD

Address: _____

I represent: NEW YORK LAWYERS FOR THE PUBLIC

Address: 151 W 30th St. NY 10001 INTEREST

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 04/23/2025

(PLEASE PRINT)

Name: Jenille Scott

Address: _____

I represent: ALIGN / Transform Don't Trash

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Lacey Tauber

Address: _____

I represent: Brooklyn Borough President Reynoso

Address: (he had to leave)

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Dior St. Hillaire

Address: _____

I represent: Greenfeen Organix

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: LAUREN PINE

Address: _____

I represent: FAMILIES FOR SAFE STREETS

Address: _____

**THE COUNCIL 5
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: _____

(PLEASE PRINT)

Name: ERIC GOLDSTEIN

Address: _____

I represent: NATURAL RESOURCES DEFENSE COUNCIL

Address: 40 WEST 20 ST. NY NY 10011

**THE COUNCIL 4
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____
 in favor in opposition

Date: 4/23/25

(PLEASE PRINT)

Name: Madison Pinchney

Address: 151 W. 30th Street, NY NY 10001

I represent: New York Lawyers for the Public Interest

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/23/25

(PLEASE PRINT)

Name: Wendy Chavez (to comment on CWZ)

Address: 1325 Ave. of the Americas, 14th Fl., NY, NY 10019

I represent: Faztec Industries, Inc.

Address: [Redacted] Staten Island NY 10314

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. _____ Res. No. _____

in favor in opposition

Date: 4/23/25

(PLEASE PRINT)

Name: LEW DUBUQUE

Address: _____

I represent: NATIONAL WASTE + RECYCLING ASSOCIATION

Address: 1550 CRYSTAL DRIVE, SUITE 804, ARLINGTON VA 22202

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. AW 1228 Res. No. _____

in favor in opposition

Date: 4/23/25

(PLEASE PRINT)

Name: Kathleen Irwin

Address: [Redacted] Albany

I represent: New York State Restaurant Assn

Address: " "