Testimony of
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New York City Department of Sanitation

Hearing before the New York City Council
Committees on Sanitation & Solid Waste Management
Tuesday, December 9, 2025, 10:00 A.M.

Engagement for the City's 2026 Solid Waste Management Plan

Good morning, Chair Abreu and members of the Committee on Sanitation and Solid Waste Management. I am Jennifer McDonnell, Deputy Commissioner of Solid Waste Management at the New York City Department of Sanitation, and I am joined today by Katherine Kitchener, Executive Director of Resource Recovery and by Joshua Goodman, Deputy Commissioner, Public Affairs & Customer Experience.

History: SWMP 2006

It has been close to 20 years since the City of New York last submitted a proposed solid waste management plan (SWMP). In that time, DSNY has achieved significant progress on the goals of the 2006 SWMP, the waste stream and industry have noticeably evolved, and the State has clarified and updated the requirements for solid waste management plans.

Achieving the goals of the last plan has transformed the solid waste system serving New Yorkers and, whether they see it each day or not, the experience of living in New York City. With the successful conversion of four marine transfer stations to the modern, efficient, fully contained intermodal export facilities operating reliably and serving the city every day, coupled with a complement of rail-export land-based facilities, a majority of the solid waste exported by DSNY is leaving the city by rail, drastically reducing truck traffic and associated emissions.

Another goal achieved is the long-term contract with Sims Municipal Recycling resulted in the construction of the metal, glass, plastic, and carton sorting facility at the South Brooklyn marine terminal that continues to process residential curbside recycling to this day. And for paper recycling, the Pratt Paper mill on Staten Island converts much of the residential paper recycling stream to new paper, a true example of the circular economy, right here in our city.

We also advanced transformative programs that were not envisioned in the last SWMP. To divert organic material that constitutes upwards of 30% of the residential waste stream, in 2023, DSNY announced a strategy for citywide, curbside organics collection. Later that year, the Council passed historic legislation to mandate residential source separation of all food and yard waste. As of October 2024, every New Yorker in all five boroughs can participate in the largest, easiest curbside organics collection program in the nation. Since full citywide implementation, we've seen staggering tonnage increases, including three consecutive weeks in November that each set records. Diverting six million pounds of material from the waste stream each week was long

derided as impossible – and now we've done it back to back. In response, the regional market is adapting and building to meet the demand of the city's leadership on organics.

All the while, DSNY continued a commitment to community recycling events, apartment-based collection programs, and efforts further up the waste management hierarchy focused on reuse and waste prevention of all types of materials- through partnerships with businesses, nonprofit, and community organizations engaged in reuse, repair, and innovations in materials management. In sum, DSNY has some of the most comprehensive, residential solid waste programming in the country. From universally accessible curbside recycling and composting collection to FREE compost givebacks, SAFE Disposal Events, special waste drop-offs, refrigerant collection, and no-cost apartment bin programs for electronics and textile recycling, New Yorkers have many options to participate in waste reduction and recycling.

Before we discuss the proposed SWMP, I would like to emphasize again two points: first, state DEC regulatory requirements have evolved significantly since 2006, notably requiring a 10-year planning period rather than a 20-year planning period, and secondly, that while the SWMP provides a framework for diversion and efficient waste systems, the City can and must pursue specific programs that are not contemplated in this document. This is, by design, a beginning rather than an end.

Our record here speaks for itself: neither universal curbside organics nor Commercial Waste Zones were laid out in the 2006 SWMP, and yet the City took historic action to move both policies forward in partnership with the City Council. This is particularly relevant to keep in mind as we discuss SWMP26.

Future: SWMP26

DSNY's rich history of evolution, continuous improvement, and innovation lays the foundation for this next solid waste management plan that we are proud to put forth, to guide future progress in waste reduction and resource recovery over the next decade. With over 24 billion pounds of waste generated by hundreds of thousands of businesses and millions of residents across the 5 boroughs every year, the 2026 solid waste management plan is a flexible framework focused on the areas with the greatest potential impact on the existing solid waste management system.

SWMP26 was designed to meet the regulatory requirements and guidance of DEC, and the program structure follows the stipulations for alternative analysis that all planning units across the state must consider when developing a SWMP. This SWMP was developed over the past three years, beginning with an extensive analysis of the current conditions for the solid waste management system in NYC. The first four chapters of the plan documents in great detail who is generating how much of what materials (to the best of our knowledge), where they are going, and what the end-of-life options are for managing them. As a result of this data-driven analysis, and with input from best practices worldwide, the draft SWMP includes eight dedicated program areas designed to address the primary focus points needed to achieve continued progress in waste

reduction, increased recycling and a path towards zero waste. These programs include: waste prevention and reuse, organics diversion and recovery, residential recycling, residential municipal solid waste, commercial waste, construction and demolition waste, special waste and education and outreach.

For DSNY, this next SWMP is the beginning of the next chapter in our journey, one that has become more inclusive, more expansive, and more effective. As outlined in the 126 initiatives supporting the ~20 strategies underneath each program, we have goals and objectives that we will partner with many Agencies, Offices and stakeholders to implement. The SWMP is not a rigid blueprint for every possible action over the next decade, rather it provides strategic direction and guiding principles as well as comfortably specific objectives. This enables the Department, and the city, to continuously adapt our approach while in pursuit of our goals. It is a plan that lays the foundation for an ambitious future while providing flexibility that is necessary in our ever-changing world.

At the same time, the SWMP is not the only plan guiding DSNY's work, nor all solid waste management efforts throughout the city, and there are specific programs and initiatives that it does not contemplate, such as containerization, curbing illegal dumping, or collection operations. DSNY will continue to innovate and plan in those areas, and intersect them with SWMP programming as appropriate. We will also continue to support others in their journeys on waste reduction and resource recovery, by serving as a technical expert, a resource for educational materials and programming, and a convener of collaborators in the circular economy.

To talk specifically about a few key objectives contained in the SWMP, organics remains a priority, most importantly continuing to increase participation and recovery rates. We plan to achieve this through a diverse combination of applied technology, diversification, and experimentation. For example, we will research alternatives to plastic liners for collection and investigate how we can leverage new equipment to better separate contamination from collected organics. Commercial waste zones are another priority, and an additional focus that was not identified in the last SWMP. DSNY has already committed to full implementation of the zones by 2027, and we are excited about the data quality and diversion improvements that will follow from this thoughtfully designed and rigorous contract-driven program.

Finally, we know very well the responsibility of having a reliable, safe, and resilient system for solid waste export, yet we look to the future where the next generation of this requirement emerges. To get to that future, we have positioned the Waste Reduction program as the first program, one that will enable recovery of value, reduction of impacts, increased benefits, and better environmental outcomes. This work is undoubtedly the most difficult work, and work that requires each and every one of us to steward the resources we consume. In that way, DSNY is serving as a leader - as this a comprehensive plan for managing the waste of the entire city of New York! For that reason, the SWMP includes programs and commitments that are outside of

our Agencies' direct jurisdiction however we are proud to serve as the host for them under the umbrella of a more sustainable city.

The future DSNY envisions is one where all the resources in the city are managed responsibly and to the best value. Whether it's advancing textile-to-textile recovery, turning food scraps from our diverse cuisine into biogas to support a clean energy transition, or developing new ways to reuse materials in future manufacturing industries, the solid waste management plan is designed to address the full breadth of materials management in a city as complex, diverse, and innovative as ours.

SWMP26 Outreach

Before moving to your questions, I would like to share details on the public outreach and engagement we have conducted as part of plan development. These statistics are not included in the plan but are a testament to DSNY's desire to make the SWMP a roadmap for all. We began formal outreach for this SWMP last year, starting with City agencies that, in collaboration with DSNY, would have a major role in implementing SWMP26. These agencies include NYCHA, Parks, DEP, Public Schools, DCAS, DOT, EDC, DDC, and the Mayor's Offices of Environmental Remediation and Climate Change and Environmental Justice. DSNY conducted 15 meetings with New York City agencies in 2024 and 2025. DSNY has also been an active participant on the Clean Construction Executive Order 23 Implementation Working Group and the Environmental Justice Interagency Working Group. These engagement efforts identified synergies between many planning efforts including the State's SWMP, CLCPA, PlaNYC on climate, and Food Forward NYC, as well as the EJNYC Plan, NYC Industrial Plan and Urban Forest Plan, also under currently review. We have included many strategies that commit to this continued agency and office collaboration in SWMP26.

DSNY then began outreach with elected officials, specifically this Committee and Borough Presidents. Since the spring, we have met with each of you or your staff and welcomed you to share information about the proposed SWMP26 framework with constituents to solicit feedback.

Additionally, DSNY met with stakeholder groups including the Solid Waste Advisory Board (SWAB) chairs, Town and Gown's Urban Resource Recovery Working Group, the Regional Planning Association, the NYC Climate Leadership Group, the EJ Advisory Board, and the Transform Don't Trash NYC Coalition.

The comments received through these efforts have already shaped the draft Plan. For example, a resiliency assessment of key export infrastructure was added after meeting with the citywide EJ Advisory Board.

On October 27, 2025, DSNY held a virtual public meeting to share information on SWMP26 and to respond to questions from the public. The meeting was recorded and the recording and presentation are posted on DSNY's website.

We also heard from advocates and from many of you a desire for more time to review the draft SWMP and provide comments. In response to your requests, DSNY was pleased to extend the public comment period an additional 60 days, now concluding on January 16, 2026, rather than the original public comment conclusion date of November 17, 2025. This more than doubles the legally required 45-day review time.

Additionally, DSNY is grateful to the SWABs for hosting a series of Learning Sessions, open to all residents and organizations to gather feedback that will be shared with DSNY and incorporated into the plan. DSNY looks forward to addressing all comments received, as well as relevant feedback from testimonies received today.

Finally, unlike the 2006 SWMP, no new physical infrastructure is proposed in SWMP26. Some may be proposed as part of implementation, and as discussed at the public meeting, there would be dedicated engagement around any specific facility, including requisite environmental reviews. This SWMP will be implemented over the 10-year period, and DSNY will report on implementation every other year in biennial reports to DEC, which are posted on DSNY's website after approval. While drafting the Plan, DSNY identified the need for a minimum of six stakeholder focus groups and 19 strategies that will rely on collaboration with community organizations and composting groups during implementation. Those groups will be formed after the plan is formally approved by both Council and DEC next year. We welcome you to stay engaged throughout the implementation process and are glad to be working with all of you to make this plan a reality.

Thank you for your interest in the Solid Waste Management Plan, I look forward to answering your questions.

OFFICE OF THE BROOKLYN BOROUGH PRESIDENT

ANTONIO REYNOSO
Brooklyn Borough President

City Council Committee on Sanitation and Solid Waste Management
Oversight: Engagement for the City's 2026 Solid Waste Management Plan
December 9, 2025

Good morning, Chair Abreu and thank you for holding this hearing today to bring attention to the Department of Sanitation (DSNY)'s Draft 2026 Solid Waste Management Plan (SWMP). I am here representing Brooklyn Borough President Antonio Reynoso, former Chair of the City Council's Sanitation Committee.

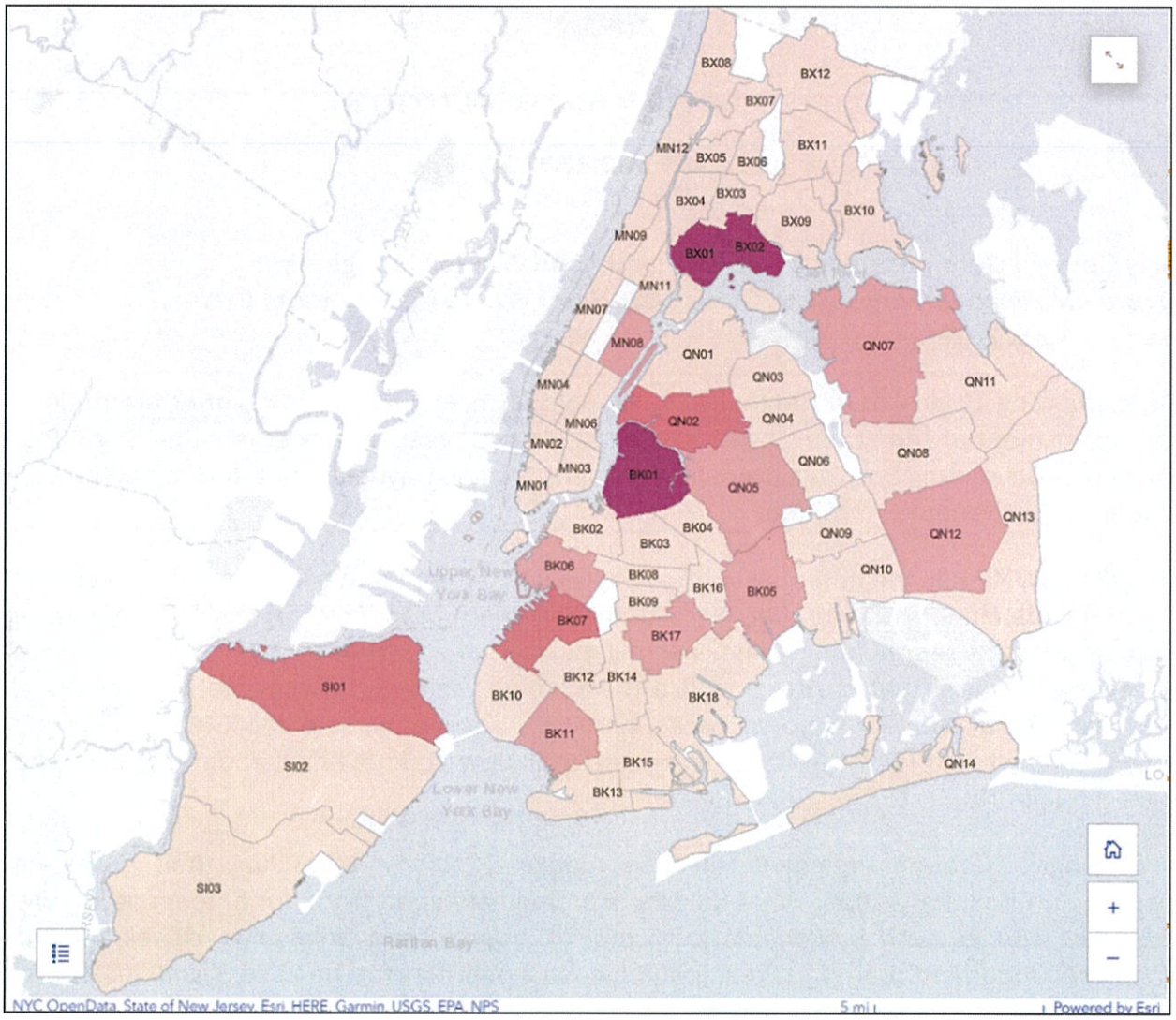
The 2026 SWMP has the potential to be a visionary document that cements NYC as a global leader in sustainable and equitable waste management practices; however, in its current form, it primarily represents business as usual. Additionally, DSNY's lack of outreach and engagement–one virtual info session for a 10-year plan –has been unacceptable. Thankfully, the city's Solid Waste Advisory Boards (SWABs), advocates, and the City Council are stepping up where DSNY has failed to ensure that New Yorkers know about this plan and have the opportunity to share their ideas.

Accordingly, Borough President Reynoso thanks DSNY for extending their comment deadline until January 2026. What follows is preliminary input from our office, and we will continue working with stakeholders to inform, engage, and provide feedback on this important document. Borough President Reynoso's priorities for the 2026 SWMP include:

Waste Equity
The 2006 SWMP was transformative in that it incorporated advocacy from NYC's environmental justice (EJ) communities, who pushed back on the overconcentration of private waste facilities and the associated air quality and street safety impacts in their neighborhoods. The 2006 Plan outlined the shift of DSNY's waste processing from private facilities to City-run Marine Transfer Stations (MTSs), a vision that has now been mostly realized. As the 2026 Draft notes, the MTSs "have reduced long-range truck traffic and associated climate and air pollution by containerizing and transporting municipal solid waste (MSW) via barge and rail, more fuel-efficient modes of transportation that avoid congested highway bridges and tunnels."

In 2018, the City Council passed Borough President Reynoso's Waste Equity legislation, decreasing the amount of permitted waste capacity in three overburdened communities: North Brooklyn, the South Bronx, and Southeast Queens. According to the 2026 Draft, this "resulted in a decrease in material managed at affected private transfer stations by nearly

3,000 tons per day." (That is equivalent to about 214 fewer private waste trucks in these communities daily.) However, as this map from the Office of the NYC Comptroller shows, concentration of waste facilities in certain communities remains an issue:



The 2006 SWMP proposed allowing barge export of commercial waste at the MTSs; however, 20 years later, despite ongoing advocacy from EJ communities, DSNY still does not allow it. The more waste we can send to these facilities, the fewer dangerous and polluting long-haul trucks on our streets. Additionally, because the MTSs are operated by DSNY, we know we don't have to worry about the usual concerns with private facilities, such as compliance with maintenance regulations and worker protections. DSNY must finally codify a plan to allow commercial waste at the MTSs as part of the 2026 SWMP.

Additionally, DSNY must address the EJ implications of concentrating its organics processing through anaerobic co-digestion in Brooklyn Community District 1, which already has the highest permitted waste processing capacity of any community district citywide. The Waste Equity law included an exemption for recycling and organics; however, large-scale co-digestion of organics at wastewater recovery facilities was not envisioned at the time. Analysis in our 2025 report *Expanding Composting in New York City: The Case for Passing*

and Implementing Intro-0696-2024 indicates that DSNY's plans to scale up co-digestion could add approximately 40 more trucks per day to the streets in CD1, undermining the goals of the Waste Equity law.

As participation in the curbside organics collection program increases, DSNY should instead identify sites within the five boroughs to process organics through traditional composting methods. Composting locally has economic benefits for our communities and avoids the pitfalls of anaerobic co-digestion, which can create increased emissions and toxic byproducts. The report, which includes analysis of where new compost facilities could be sited in all five boroughs, will be submitted to DSNY as an addendum to our comments.

Commercial Waste Zones

The legislation that Borough President Reynoso is most proud of from his time as Chair of the City Council's Sanitation Committee is Commercial Waste Zones (CWZ). This program addresses myriad issues with the private carting industry by limiting vehicle miles traveled (improving both air quality and street safety); increasing enforcement of dangerous driving, fleet conditions, treatment of workers, etc.; and ideally increasing diversion of waste from landfills by incentivizing recycling and organics.

However, DSNY significantly delayed the program's implementation and made major changes, prioritizing price over all other factors when selecting carters, and creating a years-long rollout plan that further delays reforms. The plan that we created with the previous administration was carefully crafted to incentivize recycling and diversion rates, good jobs, and clean fleets. Meanwhile, delayed implementation has meant more unnecessary vehicle miles traveled, more unsafe working conditions for transfer station employees, and more dangerous trucks on our streets, as carters delay investments due to uncertainty. The agency's claim that the original plan would cause costs to skyrocket is not borne out by the findings of their own environmental review, which showed that increased efficiencies would offset any increased costs for the carters.

Borough President Reynoso encourages DSNY to revisit CWZ as part of the 2026 SWMP, setting up the next administration to: speed up the program's rollout, impose high enforcement standards that remove bad actors from participating, and revisit the awardees' Zero Waste Plans to ensure compliance. DSNY should also make awardees' Zero Waste Plans public so that businesses have more information than price to evaluate when choosing between carters.

Diversion of Waste from Landfills

As Sanitation Chair, Borough President Reynoso worked closely with DSNY to support the de Blasio administration's stated goal of sending zero waste to landfills by 2030. However, the city's diversion rate continues to hover at 18.5% as of the most recent Mayor's Management Report, only slightly up from the previous five years and well under DSNY's stated goal of 23% and the long-term goal of keeping 100% of recyclable waste out of landfills.

Yet DSNY has used creative means to get around compliance with City Council legislation meant to increase diversion. The Community Organics and Empowerment (CORE) Act requires DSNY to establish at least one community recycling center in each borough and at least 30 organic waste drop-off sites citywide, with at least three in each borough. Yet DSNY has argued that they can meet this bill's mandate through use of drop-off bins that send organics to be co-digested with wastewater. The 2026 SWMP should commit DSNY to actual compliance with the CORE Act.

DSNY should also commit to including options for recycling and organics in its waste containerization program. New York City is long overdue for citywide, on-street, shared waste containers, which will bring our city in line with dozens of major cities globally. However, failing to include recycling and organics in these containers is a missed opportunity. DSNY's *Future of Waste* report recommended including bin space for all three types of waste, and DSNY is now rolling out three-section bins at schools. Yet the agency intends to use landfill-bound-trash-only bins for the citywide rollout. According to the Center for Zero Waste Design, "creating equally convenient waste drop off areas for trash, recycling, and organic waste leads to higher diversion rates." Additionally, a smart containerization plan should be tied to a save-as-you-throw model based on bin or bag size to incentivize separation of recycling and organics. This is in line with the 2026 Draft's recommendation to "study incentive-based waste management policies."

The 2026 Draft seeks to create opportunities for waste diversion for residents of New York Housing Authority (NYCHA) buildings, most of whom do not have access to brown bins for organics recycling. In addition to the strategies laid out in the Draft, innovative programs provide models that DSNY should expand. For example, Gotham Food Pantry partners with NYCHA Resident Associations so that residents attending free food distributions can also drop off their food scraps for composting. This provides an opportunity to educate residents about the value of composting and how to separate their organic waste. Some residents can also drop off at farms and compost sites on their campuses through Green City Force and Compost Power. These models have proven successful, and more residents could benefit from their expansion.

The 2026 Draft also seeks to expand single-use plastic waste reduction initiatives in schools. NYC schools generate more than 80 million pounds of refuse every year, and while all schools now separate food scraps as of May 2024, contamination (putting material in the wrong bin) remains an issue, especially with plastic in the food waste stream. Cafeteria Culture provides a successful solution in their pilot program that ran at P.S. 15 in Red Hook from 2022-2023. It included three interventions: Plastic-Free Lunch Day, which addressed plastic food packaging; a Reusables Intervention, partnering with local organizations for four weeks to provide reusable cutlery and cups and wash them; and Mindful Choice Meals, which allowed students to choose their own options for a complete meal. They found that through these replicable programs, they could reduce food waste by up to 50% per student and plastic waste by up to 99% per student.

Construction & Demolition (C&D) waste makes up more than 60% of the city's solid waste stream, according to the NYC Economic Development Corporation, so it is positive that the 2026 Draft considers reuse of C&D materials. However, there is an opportunity to expand this idea. Much of the waste generated by C&D projects can be recycled or reused, including carpet, scrap lumber, steel, concrete, and ceiling tiles. One example that advocates have suggested to incentivize this practice would involve DSNY working with the Department of Buildings to require companies to submit a waste management plan requiring a certain amount of diversion per project in order to receive a demolition permit.

Finally, it is heartening to see DSNY codify its commitment to supporting community composting. These facilities play a critical role in a comprehensive organics diversion system by: diverting millions of pounds of food waste from landfills every year; providing free compost to the Parks Department, community organizations, street tree maintenance, school gardens, Botanical Gardens, and community gardens; creating jobs; and playing a critical role in educating youth and the public about the value and mechanics of composting. We must continue to support and expand these efforts citywide.

Thank you again for the opportunity to weigh in on this important Draft 2026 SWMP. As mentioned, our office will continue to work with stakeholders and the City Council to review the plan, and to ensure that DSNY receives and incorporates feedback into its final submission to the State.

BRONX BOROUGH PRESIDENT VANESSA L. GIBSON

Testimony of Bronx Borough President Vanessa L. Gibson
New York City Council Committee on Sanitation and Solid Waste Management
December 9, 2025

Good morning Chair Abreu and the members of the Committee on Sanitation. Thank you for convening this important hearing today regarding the City's draft Solid Waste Management Plan (SWMP). This is an important opportunity to examine the next ten years of how our city produces, transports, and disposes of the more than 13 million tons of solid waste we generate each year.

Historically, The Bronx has been one of the hardest hit parts of our city when it comes to the siting of the infrastructure and industry associated with the handling, processing, and disposal of solid waste. The environmental effects that come with this infrastructure have had demonstrably negative effects on the health and well-being of Bronx residents. Bronx Community Districts 1 and 2 in particular have long borne the burden of handling a significant share of the city's waste, with the presence of waste transfer stations. The City must do more to ensure that The Bronx does not bear a disproportionate burden of the city's waste disposal streams.

The City must commit to expanding the marine and rail transportation options that would remove trucks from our roads and make our air cleaner and our streets safer. The 2006 SWMP planned for four marine transfer stations to accept commercial waste, enabling this material to be exported from our city by water instead of by road. This plan must be fully implemented over the coming decade.

Additionally, the City should consider siting composting facilities in each borough. By directing organic waste locally, we can reduce the miles travelled by trucks exporting this waste out of our city. In order to achieve zero-waste outcomes throughout New York City, we must do more to encourage local solutions that are both environmentally friendly and cost effective. This is especially important as organic waste collection is projected to increase over the coming years due to the rollout of the new mandate.

Across the city, including in The Bronx, one of the largest sources of waste is from construction and demolition sources, accounting for about 40% of all waste. There is significant opportunity to increase the share of this waste that is reused or recycled, including through expanding City agency use of recycled asphalt, concrete, and soil. I urge the City to collaborate with our industrial and construction businesses to determine how

best to reduce the generation of this waste as well as with the processors that handle this waste to create more expansive reuse policies. There are numerous opportunities for reuse and recycling that can keep this material out of landfills that the City must explore.

With the Commercial Waste Zones being fully rolled out in The Bronx as of November of this year, we must be cognizant of compliance among businesses and whether the program is meeting its goals of reducing truck traffic and improving environmental, health, and safety outcomes. Additional outreach and education will be important to ensure that all businesses are able to have the information they need to make informed decisions about their contracts with the selected haulers. Further, the City must continue to provide oversight of the selected commercial haulers to ensure that they are fulfilling their contracts. Additionally, DSNY must continue to monitor the success of the program to see whether it may be appropriate to recommend to the Council that modifications be made to best ensure positive outcomes.

The main way that New York City can reduce the amount of material being sent to landfills and incinerators is through increasing the share of this material that is recycled and composted. Increasing recycling and composting must be accomplished at all levels, from individuals and households to major institutions and commercial and industrial businesses.

DSNY and other city agencies should do more outreach with residential buildings and businesses to ensure that they fully understand, and are in compliance with, recycling and composting mandates. The Mayor's postponement of the residential organics collection fines will be ending in January, so buildings across our city must be prepared to fully comply with this mandate in the new year.

Furthermore, our schools and NYCHA housing developments are important avenues for increasing awareness of recycling and composting. Educating our students on the proper ways to separate the various kinds of waste will enable them to bring these lessons back to their homes. Many of our NYCHA developments are large buildings with hundreds of residents. Because of the number of residents, they generate large amounts of waste and should be a primary target for ensuring that separate streams are maintained with high compliance.

While outside of the scope of the SWMP, it should also be noted that litter and street cleanliness are important factors for how New Yorkers conceive of waste management. When residents see their streets covered in trash, they do not necessarily perceive that the city is taking sanitation seriously and therefore do not feel they need to take sanitation seriously, leading to more littering and street trash. We must have more on-street composting and recycling bins with a greater frequency of pickup of trash bins. The City must

continue to bring containerization to every block and to work with affected parties like our Business Improvement Districts. Ensuring that litter gets to the proper disposal streams is important to overall system management.

There are many more solutions that both the State and the City can introduce and implement to reduce the amount of waste that we generate. The next legislative session in Albany will likely see further discussion of expanding Extended Producer Responsibility (EPR) to plastic packaging waste. This will be an important goal to achieve plastic waste reduction throughout New York.

Overall, we must be cognizant of the effects that more mandates have on our residents and businesses. New York is facing an affordability crisis, and many New Yorkers are struggling, including in The Bronx. Increasing costs on business will often be passed on to consumers through higher prices. We must work to ensure that our residents do not bear increased costs associated with waste reduction. Additionally, fines for residences will often fall on homeowners and small landlords more significantly than on big property owners. The City must ensure that there is a balance between issuing violations when New Yorkers are struggling to pay for food and shelter with the goal of reducing waste. We cannot let those who are struggling the most bear these costs.

As Borough President, I will continue to collaborate with the Bronx Solid Waste Advisory Board (SWAB) to ensure that we pursue policies that benefit The Bronx and guarantee that we are part of the discussion on how to make positive change for our communities. Our residents must have more opportunities to make their voices heard regarding solid waste, and the SWAB is an ideal venue for making that happen.

I commend the Council Committee on Sanitation for your tireless efforts to ensure that our city adopts as strong a Solid Waste Management Plan as possible for the next ten years. I look forward to working with all stakeholders to ensure that environmental justice and equity remain at the center of our city's waste management strategy. Together we can ensure that we generate less waste, recycle more, and send less trash to polluting landfills and incinerators.

Draft All SWAB Testimony for the New York City Council Sanitation Committee Hearing
10 AM, December 9, 2025
Oversight - Engagement for the City's
Draft 2026 Solid Waste Management Plan
250 Broadway - 8th Floor - Hearing Room 1

The question was asked of the SWABs in June and October: "Is there anything missing from the Draft 2026 SWMP?" Our answer then was: "We do not know; it is too early to tell. We need more time—forty-five days are not enough." We appreciate that the DSNY provided an extension to the public commentary period on November 14th - providing an additional 5 weeks of working time, excluding holidays. However, now that the SWABs have had time to fully digest the Draft 2026 SWMP, we believe that the gaps that we have identified cannot sufficiently be addressed by mid-January of 2026.

Today, in our preliminary assessment—after reviewing two previous SWMPs, multiple Waste Characterization Studies, studies and reports from the 1980s through 2000, various City and State laws and regulations, and a comparative analysis of waste streams, diversion, and export using the "Track NYC Trash" website the SWABs built with Open Data (https://tracknyctrash.com/), we can say that the Draft lacks the continuity and context needed to demonstrate alignment with the City Council's local laws and with past plans intended to increase diversion and capture rates.

Despite nearly 35 years of effort, the City has not meaningfully improved diversion of recyclables: the residential recycling diversion rate has remained between 18–19%, with roughly 81.5% of potential recyclables still landfilled or incinerated.

Yet the majority of programs proposed to reach a 2036 diversion target of 30.5% in the Draft 2026 SWMP are themselves decades old: textiles programs (1992, 2010 in current form),

prevention/repair/reuse/exchange initiatives (1989, 1992, 2006), organics pilots (1980s, 2013), and community composting (1990s). Of the 13 Local Laws, State laws, regulations, and DSNY regulations enacted to increase diversion, the SWABs identified only three or four that have had any measurable impact. DSNY itself acknowledges in the Draft 2026 SWMP that it has limited capacity to enforce many of these laws.

Our review also makes clear that the Department of Sanitation is not structured to drive sustainability. Its core competencies - collection, routing, uniformed personnel management, waste disposal, data collection, snow removal, and enforcement - can support the implementation of sustainability programs, but they do not, on their own, develop or propel it.

Although our preliminary findings have not yet yielded specific recommendations, they point toward the need for a coherent 10-year strategy. If the City is to achieve the Draft 2026 SWMP's projected 30.5% residential diversion rate by 2035, it must adopt a plan far more capable than the one currently proposed. A successful plan must realistically assess and leverage DSNY's strengths, recognize the limits of regulatory and legislative tools, mitigate the externalities of disposal choices, formally test what works and what doesn't - releasing test results publicly, and connect specific actions to measurable diversion outcomes.

On October 16, as part of our review, the SWABs began hosting eight, weekly, public information-gathering sessions and three public hearings. A key purpose of these sessions was to hear directly from communities both inside and outside NYC that host waste-related sites and are therefore disproportionately affected by New York City's waste exports. We received compelling testimony about the economic, environmental, quality-of-life, and health burdens created by the City's continued reliance on landfilling and incineration- communities that the Draft 2026 SWMP refers to only as "Accessible Capacity for New York City Waste Management."

Research shows that around two thirds of NYC's waste is recyclable or compostable under our curbside programs available year round to every NYC residence. At the moment, those trucks

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are picking up about half of what they could for recycling, and a mere 7% of what they could for organics, sending over 1.6 million tons of valuable metal, glass, plastic, paper, and organics a year to landfills or incinerators despite the existence of weekly collection arrangements, processing contracts, and the trash revolution. This plan simply recommits to the same vaguely quantified suite of outreach and education measures the DSNY has always mounted - mass mailings, periodic tabling or door knocking, social media — without acknowledgment of the need for fundamental changes to how the City involves residents and grows sustainable participation.

New Yorkers deserve a plan that makes these connections clear- one that demonstrates that most trash is unnecessary, that practical alternatives exist, and that meaningful progress is possible. Redirecting the hundreds of millions of dollars now spent on waste export toward practical, sustainable actions aligned with DSNY's strengths would finally move the needle on capture and diversion rates, reduce harm, and yield measurable environmental and fiscal benefits.

In summary, the SWABs recommend that at least an additional six months are needed to adequately assess and respond to this plan. The SWABs thank you for the opportunity to testify and look forward to providing additional substantive public comments in 2026.

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Expanding Composting in New York City:

The Case for Passing and Implementing **Intro-0696-2024**

Released September 2025

BROOKLYN BOROUGH PRESIDENT
ANTONIO REYNOSO

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Introduction

About one-third of the approximately eight million tons of waste that New Yorkers produce every year is organic material, including food scraps and yard waste.

This material traditionally travels from our homes and businesses by truck to landfills or incinerators, where it becomes the most significant contributor of waste-related greenhouse gas emissions.[1]

While the New York City Department of Sanitation (DSNY) has now fully implemented a citywide curbside organics collection program that incentivizes residents to separate their organic waste and in turn diverts this waste from landfills, the City can still do more to ensure this waste is processed responsibly.

Intro 0696–2024 (Intro-696), Sponsored by Council Member Sandy Nurse, would require DSNY to ensure that there is a minimum cumulative annual aerobic processing capacity of 180,000 tons of organics in each borough, inclusive of all public and privately managed compost sites in that borough, including existing facilities. DSNY can achieve this through establishing any number of City-owned, -operated, or -contracted sites. The additional capacity needed to reach 180,000 tons will vary greatly by borough based on what facilities already exist.

Co-digestion is currently a necessary part of the solution to NYC's organics processing. However, the ideal ratio between co-digestion and local composting should be reevaluated. The bill seeks to ensure that New York City processes its organics through a local and resilient composting network, rather than the capital-intensive investment associated with anaerobic co-digestion. Facilities may be of varying sizes, employ distinct composting methods, and be for-profit or non-profit. Material for these sites would be primarily sourced from the new citywide residential organics collection program, as well as from Smart Bins, food scrap drop-off sites, and significant yard waste generators. A review of the NYC residential organics stream finds a sufficient balance of pure food scraps and yard waste that is ideal for producing local compost.[2] Accepting commercial organics is possible as their separation becomes increasingly mandated.

A shift toward local composting infrastructure is also aligned with New York City's Waste Equity Law (Local Law 152 of 2018), which seeks to reduce the amount of waste

processed in community districts that have an overconcentration of waste transfer facilities and the associated air quality and street safety impacts they cause: Bronx 1, Bronx 2, Brooklyn 1, and Queens 12. Under this law, waste facilities that process recyclables and organic waste are exempt from capacity reductions and limits required by law in those districts, and may receive permit expansions to accommodate increased diversion. Since organics account for approximately 43 percent of refuse, expanding local composting under Intro-696 could help reduce truck traffic and the burden of waste transfer in these historically impacted districts.[3, 4]

Historically, the public and private sectors have had difficulty siting composting facilities in New York City.[5] Through research, we developed a methodology for a land survey to identify potential sites. The methodology, mapping, and highlighted site analysis are included in this document, as well as a policy brief exploring the environmental and economic impacts of Intro-696.

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[1] *NYC Greenhouse Gas Inventories*. NYC Mayor's Office of Climate and Environmental Justice. https://climate.cityofnewyork.us/initiatives/nyc-greenhouse-gas-inventories/

[2] Food scraps require integration with carbon-rich organics ("browns") to achieve a balanced compost with an ideal Carbon to Nitrogen ratio (C:N) of 30:1. A review of NYC residential organics stream finds a potential C:N of 46:1. See section "Compost and Composting," page 9.

[3] Because so few organics are source-separated, the majority remains in the refuse stream. Since 34% of all curbside aggregates are organic material, this comprises 43% of refuse, per DSNY's *2023 Waste Characterization Study*.

[4] Local law 152 of 2018: https://www.nyc.gov/site/dsny/resources/reports/waste-equity-law.page

[5] *Meeting of Committee on Sanitation and Solid Waste Management on 6/3/2024*. (2024, June 3).The New York City Council. https://legistar.council.nyc.gov/MeetingDetail.aspx?LEGID=20911&GID=61&G=2FD004F1-D85B-4588-A648-0A736C77D6E3

Processing Organics

In New York City, diversion of organics from landfills and incinerators has lagged behind plastic and glass recycling.[6] New York City's full rollout of its municipal curbside residential organics collection program has the opportunity to change this. Currently available data indicates that organics capture rates remain low but climbing, as full roll-out occurred in October 2024 and enforcement began in April 2025.

The City's climate budgeting documents project that by 2050, 50% of all available residential organics will be captured.[7] If this projection is realized, more than 400,000 tons of organic material would be diverted from landfills and incinerators annually, reducing greenhouse gas emissions by approximately 201,000 tons of greenhouse gas through 2050.[8] Achieving this goal will require significant outreach and education, but it remains feasible and would result in a substantial reduction in refuse tonnage.

As of 2025, DSNY is projected to spend approximately $500 million annually on the export of mixed solid waste (MSW) to landfills and incinerators.[9] Based on the City's waste composition, an estimated 43% of this exported MSW consists of organic material. This means approximately $215 million of the total export budget is implicitly spent each year on disposing of organics as part of the MSW stream.[10] As organics capture rates increase, these contract payments will be adjusted downward to reflect reduced waste export costs.[11, 12]

In contrast, DSNY's current budget explicitly allocates approximately $21 million toward dedicated organics programs, which covers the diversion, collection, and processing of source-separated organics (SSOs). While this $21 million figure is expected to increase as organics collection expands, it remains a small fraction of what the City already spends to export organics in the MSW stream.[13]

Local compost processing will still require public investment, but shifting SSO processing to facilities within the five boroughs would keep allocated funds circulating locally, supporting jobs, community-scale composting operations, and the production of high-quality compost. Waste export, on the other hand, continues to enrich large national contractors, most of whom operate and profit outside New York City.[14]

The City's decisions regarding SSO management will have profound economic, social, and environmental impacts beyond just the waste budget itself.

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[6] *2023 NYC Waste Characterization Study*. (2023). New York City Department of Sanitation. https://www.nyc.gov/assets/dsny/downloads/resources/reports/waste-characterization-studies/2023/wcs-2023.pdf

[7] The City of New York Executive Budget Fiscal Year 2025: Technical Appendices: New York City Climate Budgeting. (2024). NYC Mayor's Office of Management and Budget. https://www.nyc.gov/assets/omb/downloads/pdf/exec24-nyccbta.pdf

[8] Ibid

[9] *Report on the Fiscal 2026 Executive Plan and the Fiscal 2026 Executive Capital Commitment Plan for the Department of Sanitation.* (2025, March). New York City Council. https://council.nyc.gov/budget/wp-content/uploads/sites/54/2025/05/New-York-City-Health-Hospitals-Corporation-1.pdf

[10] Calculation: 0.43 × $500,000,000 = $215,000,000. Refuse refers to solid waste remaining after recycling and SSOs are removed. Because so little organics are source-separated, the majority remains in refuse. Since 34% of all curbside aggregates are organic material, this comprises 43% of refuse. Approximately 43% of refuse is composed of organic material, translating to an estimated $215 million of the $500 million waste export budget, per DSNY's *2023 Waste Characterization Study*.

[11] Capture rates are expressed as percentages using the formula: ((tons diverted / tons available for diversion) × 100). Both diversion and material available for diversion are measured in tons.
[12] Civello, Matthew M. "Long Term Contracts Slides." Manhattan Solid Waste Advisory Board. Google Slides, accessed March 5, 2025. https://drive.google.com/file/d/1kvFik7229fPatJWHf5Ye10oDQIW6f28T/view
[13] *Can The Organics Collection Program Be Fiscally & Environmentally Sustainable?* (2021, October). Independent Budget Office of the City of New York. https://ibo.nyc.ny.us/iboreports/going-green-can-the-organics-collection-program-be%20fiscally-and-environmentally-sustainable-fiscal-brief-october-2021.pdf
[14] *Checkbook NYC: New York City Contract Spending.* (2023). Office of the NYC Comptroller. https://www.checkbooknyc.com/spending_landing/yeartype/B/year/124/category/1/%20agency/197?expandBottomContURL=/spending/%20transactions/agency/197/category/1/yeartype/B/%20year/124/expcategorycode/6200/smnid/22

Anaerobic Co-Digestion vs. Traditional Composting

Organic material can be decomposed through anaerobic (digestion) or aerobic (composting) processes, both of which rely primarily on bacteria to break down organic matter.

As organics diversion rates increase, a critical question emerges: What is the most beneficial processing method for the city's organics? Both anaerobic co-digestion and composting provide clear advantages over landfill disposal, but they differ significantly in terms of environmental impact, operational challenges, and long-term benefits. The question is not whether both methods should continue to be used, but rather how they should be balanced.

Anaerobic Digestion and Co-Digestion

New York City uses anaerobic digestion to treat its wastewater at its 14 in-city Wastewater Recovery Facilities (WRRFs). This process occurs in sealed, oxygen-free environments where anaerobic bacteria break down organic matter, such as sewage sludge, to produce biogas and biosolids. Biogas consists primarily of methane (CH4) and carbon dioxide (CO_2), along with small amounts of water vapor and other gases.[15] When food scraps and other organic materials are added to sewage sludge at the WRRFs, the process is known as anaerobic co-digestion.[16, 17]

The addition of organics to WRRFs can boost biogas yields by up to 75% and reduce the amount of residual digestate (biosolids) on a marginal per ton basis, though often, at scale, co-digestion can increase the total volume of biosolids requiring disposal.[18, 19]

In its 2023 report *PlaNYC: Getting Sustainability Done*, the City articulated its plan to process the majority of food scraps collected from the curbside program through anaerobic co-digestion.[20] The largest WWRF in New York City, Newtown Creek (located in Greenpoint, Brooklyn), began processing organics through anaerobic co-digestion in 2016. Waste Management processes DSNY-collected organic waste into engineered bioslurry at its Varick Avenue facility in Williamsburg, and trucks the slurry to the WRRF for anaerobic co-digestion to produce biogas.[21]

At Newtown Creek, biogas is either cleaned and injected into the National Grid system or burned off (flared), releasing CO_2 and CH4 into the atmosphere.[22] Biosolids produced through digestion must be disposed of via landfilling, incineration, or, less frequently, land application to condition soil or fertilize crops or vegetation.

While anaerobic co-digestion has the potential to reduce greenhouse gas emissions if all biogas is captured and biosolids are beneficially reused, in practice, these assumptions for WRRFs do not always hold.

Nationwide, biosolid management and disposal accounts for 20%–60% of WRRF operating costs, and wastewater treatment is a major source of methane emissions, contributing 5%–8% of global anthropogenic methane emissions.[23] A major challenge with disposal of biosolids from co-digestion is contamination. Biosolids often contain high levels of microplastics and chemicals, including per- and polyfluoroalkyl substances (PFAS). PFAS, the so-called "forever chemicals," enter wastewater from industrial discharges, landfill leachate, and household products.[24] They are associated with immune dysfunction, cancer, hormonal imbalances, and liver damage.[25] Co-digestion does not mitigate PFAS contamination.

Efforts at the federal, state, and municipal levels are underway to establish regulatory

frameworks to address biosolids contamination. The EPA is currently preparing a risk assessment for biosolids, although its release date remains uncertain.[26] In the meantime, New York State's Department of Environmental Conservation (DEC) has introduced DMM-7, a strategy requiring PFAS testing at WRRFs and promoting industrial pretreatment programs to limit PFAS discharges at the source.

For context: the EPA's drinking water standard for the PFAS chemicals of PFOS and PFOA is 4.0 parts per trillion (ppt), while DMM-7 allows biosolids for land application with PFAS concentrations up to 20,000 ppt—reflecting a much higher tolerance in solids than in water.[27, 28]

WRRFs, with or without co-digestion capabilities, play an essential role in preventing catastrophic environmental and human harm that would result from the discharge of untreated wastewater and sewage in and around the waters of New York City. However, a perfectly operating WRRF can produce non-trivial amounts of biogenic CO_2, CH4, and nitrous oxide (N_2O).[29]

Wastewater treatment facilities do vary widely in their treatment processes and it might not be accurate to apply a study on facilities across the U.S. to the Newtown Creek WRRF where efforts have been underway, for example, to reduce fugitive emissions and to reduce biogas flaring. Progress has been made at the facility. Newtown Creek's Renewable Natural Gas production experienced major downtime in 2023, with zero output in September and October.[30] In 2024, the Newtown Creek WRRF operated properly 87% of the time, reducing flaring by 83%.[31] Though, even when system uptime reached 95%, for example in September 2024, biogas flaring persisted with a total of 54,850 standard cubic feet flared in that year.[32, 33, 34]

Compost and Composting

Should Intro 696–2024 be enacted into law, aerobic composting could become the predominant method for processing New York City's residential SSOs. The proposed legislation requires the City to establish a minimum cumulative annual composting capacity of 180,000 tons per borough, providing a citywide total of 900,000 tons—sufficient to process upwards of 90% of New York City's residential organics at a 100% capture rate of an annual 1-1.1 million tons.

Composting is an aerobic process where organic materials such as food scraps, yard waste, crop residues, and manure are decomposed by aerobic bacteria, fungi, and other microorganisms. Commercial composting usually occurs under thermophilic conditions (high temperatures) that help reduce pathogens. The primary output is compost—a biologically stable, carbon-rich soil amendment produced through the aerobic breakdown of organic matter.[35]

As with co-digestion, composting has its own set of unique environmental and logistical challenges and solutions. Composting can, in all its forms, produce greenhouse gases and leachate. The greenhouse gas emissions produced by composting are primarily composed of CO_2 and CH4. Leachate, if excessive and unchecked, can eventually saturate underlying soils and infiltrate groundwater.[36]

Composters have developed successful strategies to mitigate both errant greenhouse gases and excessive leachate at scale. Greenhouse gases from composting are not significant, especially when compared to landfill and incineration, and are effectively controlled by a balanced mix of component ingredients, proper moisture levels, and aeration.[37] Leachate can be mitigated by covering compost piles,

providing bioswales, and maintaining proper internal moisture levels.[38]

Compost is not entirely free of PFAS and it can contain microplastics and/or industrial contaminants.[39] In a 2024 study, commercial compost samples had average PFAS levels of 23 parts per billion, while samples of biosolids derived from municipal sources had average PFAS levels of 133 parts per billion.[40] Under the previously mentioned New York State DMM-7, biosolids exceeding 50 ppb are prohibited from recycling—including for use as fertilizer, compost, or soil amendments.

Composting at any scale in an urban setting presents two logistical challenges: the maintenance of a steady supply of carbon-rich inputs (leaves, woodchips, twigs, etc.) to balance the higher nitrogen levels that food scraps provide, and space. Both are particularly acute in New York City, where the sources of the aforementioned carbon inputs are not abundant and open space is in short supply.

New York City's annual 1-1.1 million tons of residential organics consists of carbon-rich inputs (leaf and yard waste, Christmas trees, and paper products) sufficient to potentially exceed the ideal carbon-to-nitrogen ratio (C:N) for compost production of 30:1.[41, 42] Any additional sources for carbon-rich materials can come from area landscapers, public parks, commercial businesses (sawdust from furniture manufacturing, for example), etc. DSNY has stated on record that Intro-696 would require "90 acres in each borough" for composting.[43] The Department reached this number based on their ratio of capacity-to-land used at their Staten Island facility. Intro-696 would require significant use of land, but capacity can be increased without increasing footprint. In fact, DSNY recently increased the Staten Island facility's capacity 2,000% by changing the method of composting used.[44] Other cities have reached a capacity of 100,000 tons in six acres.[45]

Crucially, compost and fertilizer are not the same. While compost shares some nutrient-providing functions with fertilizer, its primary value lies in enhancing soil structure, boosting microbial activity, and improving nutrient availability.[46] Composting itself offers a regenerative, climate-positive solution that promotes long-term carbon sequestration and sustainable land management.

Compost, the product, provides immediate beneficial use at the end of the composting process, without requiring complex regulatory frameworks for its application. Compost-amended soils can continue to sequester carbon for decades, creating a long-term carbon sink that offsets emissions from waste decomposition. Research shows that a single compost application can increase soil carbon storage by 25-70% over multiple decades, continuing to remove atmospheric CO_2 long after its initial application.[47]

Applying compost to urban soils degraded by heavy metal accumulation can help restore their health. Over time, industrial processes and pollution contribute to heavy metal buildup, disrupting the soil's biological and chemical balance.[48] In one study, soils contaminated with high levels of zinc—equivalent to what might be found near busy roadways or industrial sites—showed reduced biological activity. However, just two weeks after compost was added, microbial growth and biochemical activity significantly increased and remained elevated throughout the study.[49] This increase in enzyme activity may result from zinc binding to organic matter, which occurs through adsorption and the formation of chelated bonds with complex properties.[50]

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management-food/composting#definitions
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[20] *PlaNYC: Getting Sustainability Done* (2023). NYC Mayor's Office of Climate and Environmental Justice. https://climate.cityofnewyork.us/initiatives/planyc-getting-sustainability-done/
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[49] Ibid.
[50] Ibid.

Benefits of Local and Community Composting

Community composting sources organic materials locally, engages residents in the composting process, and returns finished compost to local soils.[51] This model normalizes organics recycling across all levels—from backyard bins to commercial operations.[52] As the Composting Association of Vermont notes, "organics are the only portion of the waste stream that can be fully processed within a local community."[53]

Local composting envisioned under Intro-696 shares many advantages with community composting but operates at a broader, more centralized scale—though not necessarily on a single site. To handle up to 180,000 tons of organics per borough, greater efficiencies and a different technology mix are required compared to smaller community composters.

New York City has over 30 years of experience in composting, primarily through the New York City Community Compost Project (NYCCP), predating the City's reliance on waste export or co-digestion for organics processing. The NYCCP, historically anchored by organizations including Queens Botanical Garden, Brooklyn Botanic Garden, Staten Island Botanical Garden, New York Botanical Garden, Big Reuse, Earth Matter, and the Lower East Side Ecology Center, expanded in Fiscal Year 2025 to form the NYC Community Compost Network with 12 additional groups. A recent Institute for Local Self-Reliance survey recognized NYC as a national leader in decentralized, community-based composting that fosters local processing, education, and civic engagement.[54]

Because of this long-standing infrastructure, policymakers need not speculate about what local, at-scale composting would entail. Instead, they can draw from three decades of detailed metrics and records demonstrating the performance of community composting in a challenging urban environment under varying fiscal conditions.

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[51] *Community Composting.* (2025, April 7). U.S. Environmental Protection Agency. https://www.epa.gov/sustainable-management-food/community-composting

[52] "Normalization" of local and community composting in this context means reallocating municipal spending to support it over sending organic waste to landfills and incineration.

[53] *Community Composting Training.* (n.d., accessed 2025, March 14). Composting Association of Vermont. https://www.compostingvermont.org/community-composting#cc-training

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Intro-696 and Community Composting

An ideal rollout of Intro-696 would expand and integrate existing community composting sites with future commercial-scale facilities, creating a diversified, resilient, and participatory organics processing system. This network would connect community gardens, micro-haulers, and composting groups with larger facilities, ensuring sufficient SSO processing while strengthening community ties.

Shifting SSOs away from landfilling and incineration toward localized composting would reduce greenhouse gas emissions and deliver fiscal, social, and economic benefits. Local and community composting could also reduce or at least limit DSNY and private carter truck miles traveled.

Intro-696 seeks to sharply reduce the export of New York City's organic waste. Current centralized composting and co-digestion projections estimate an additional 25,000 to 45,000 DSNY truck trips per year beyond the existing 400,000 trips for refuse and recycling. It is reasonable to assume that Intro-696 will therefore optimize truck routing by integrating microhauling and drop-off sites to augment DSNY truck routes. Local Law 152, which capped waste transfer station capacity in North Brooklyn, the South Bronx, and Southeast Queens, acknowleged the negative impacts that waste trucks can have on communities, and eliminated up to 180 local and 60 long-haul truck trips per day in those areas.[55] Without decentralized solutions, facilities like Newtown Creek WRRF—operating at full capacity—could add an estimated 40 daily truck trips into North Brooklyn, not including additional slurry truck trips from the facility on Varick Avenue to Newtown Creek, partially undoing these equity gains. A distributed composting model would spread truck traffic more evenly across the city.[56]

New York City's infrastructure already supports this direction: DSNY projects over 400,000 tons of SSOs annually by 2050. With Newtown Creek WRRF (180,000 tons/year) and the Staten Island Compost Facility (108,000 tons/year) able to handle a combined 288,000 tons annually, a gap of 40,000 to 140,000 tons would remain. This shortfall could be met through expanded commercial-scale facilities, and community composting, complementing municipal facilities rather than competing with them.

Community composting is particularly well-suited to handling food scraps from farmers markets, micro-haulers, and institutions—streams that don't fit neatly into curbside collection. It also provides crucial backup during service interruptions caused by labor disputes, infrastructure failures, or extreme weather.

The modular and flexible nature of community composting reduces truck traffic for smaller loads, expands waste services in historically underserved neighborhoods, and advances environmental justice goals.

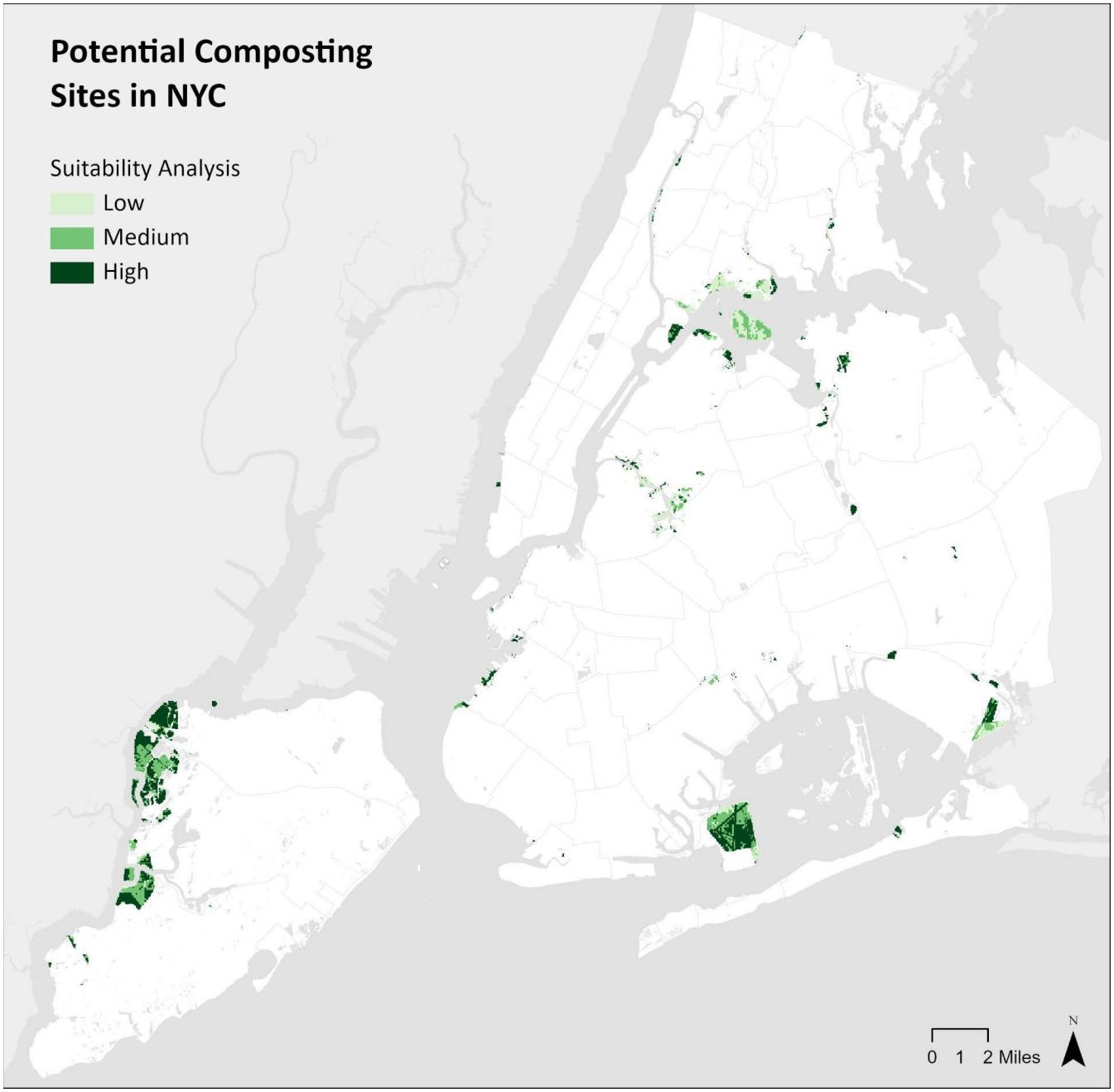
A decentralized, hybrid infrastructure—integrating large-scale composting and co-digestion with an expanded network of community-based operations—aligns with Intro-696 and similar legislation prioritizing diversification. Allocating 50,000 to 100,000 tons annually (10-25% of projected SSOs) to community composting is both feasible and beneficial, with room for further growth as micro-hauling, school, and garden-based composting initiatives expand.

Community composting is one part of that vision, which also includes municipal and commercial-scale sites. By embracing a better

balanced, distributed model, New York City can fully leverage both its centralized and grassroots composting systems to meet—and likely exceed—its waste diversion and climate goals.

[55] *Mayor de Blasio and Speaker Johnson Celebrate Signing of Waste Equity Legislation.* (2018, August 16). City of New York. https://www.nyc.gov/office-of-the-mayor/news/417-18/mayor-de-blasio-speaker-johnson-celebrate-signing-waste-equity-legislation

[56] *12 Things New Yorkers Should Know About Their Garbage.* (2014, May 21). NY Citizens Budget Commission. https://cbcny.org/research/12-things-new-yorkers-should-know-about-their-garbage



Sources: NYC Department of City Planning, Primary Land Use Tax Lot Output (PLUTO) 2024v2; U.S. Geological Survey, Geospatial Data for Bedrock Elevation and Overburden Thickness; NYC Planimetric Database, Hydrograph; Open Sewer Atlas, All Layers Map; Data were combined into a weighted suitability index see methodology for details on criteria and weighting.

Envisioning Implementation of Intro-696

Between the large, City-operated sites (Staten Island and Soundview Facilities), and smaller, community-run sites, New York City currently has approximately 40,000-50,000 tons of annual processing capacity for food scraps, and upwards of 120,000 tons including leaf and yard waste.[57, 58, 59] As previously mentioned, DSNY substantially increased its footprint by 2,000% on its Staten Island facility by changing the method of composting used. At this ratio, the bill would only require 10-15 acres in each borough, significantly less than the 90 acres in each borough that DSNY has estimated.

New York State's Department of Environmental Conservation (DEC) regulates all waste processing facilities in New York State. New York City composting facilities would be subject to State Codes, Rules, and Regulations (6 CRR-NY 361-3.2),[60] which dictate requirements for permitting, as well as the City's Zoning Resolution, which dictates where facilities can be sited. Beyond these explicit standards, compost facilities may require a variety of factors to ensure their success. These factors range from access to public utilities to convenience of trucking and drop-off routes. To capture sites that both meet legal requirements and possess favorable characteristics for the feasibility of large-scale composting, we compiled a list of criteria and shared it with the Brooklyn and Manhattan Solid Waste Advisory Boards for comment. Following their feedback, we stratified the criteria in order of importance to create a methodology. This produced a surveyed map of the city, identifying possible sites, and ranking them based on their feasibility scores.

This methodology aims to highlight sites potentially available for large-scale composting. While the recently passed City of Yes for Carbon Neutrality zoning text amendments allow for composting as-of-right as an accessory use outside of Manufacturing and Commercial Zones, we did not include these in our search, as we focused on potential larger-scale sites to satisfy the goals of Intro-696. It does not recommend a specific type of aerobic processing, which can include turned windrows, aerated static piles, and in-vessel (using a sealed container).

The output of this mapping work aims to highlight a selection of parcels that comply with DEC's basic requirements for compost facilities (6 CRR-NY 361-3.2), are zoned appropriately, and have favorable characteristics for establishing turned windrow, aerated static pile, or in-vessel sites. We attempted to capture more complex factors, such as environmental justice and economics, through metrics in our methodology, but further analysis is recommended. This analysis can be conducted by City agencies, contractors, and facility operators to maximize their capacity and efficiency at each identified site.

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[57] *From Trash to Treasure: Ahead of Citywide Curbside Composting, Adams Administration Expands Staten Island Compost Facility.* (2024, January 4). City of New York. https://www.nyc.gov/office-of-the-mayor/news/005-24/from-trash-treasure-ahead-citywide-curbside-composting-adams-administration-expands-staten#/0

[58] *Soundview Yard Waste Compost Facility: Registered or Permitted Facility Annual Report.* (2019). New York State Department of Environmental Conservation Division of Materials Management. https://extapps.dec.ny.gov/

fs/projects/SWMF/Annual%20Reports_Solid%20Waste%20Management%20Facility/Annual%20Reports_by%20Activity%20Type/Composting%20-%20Yard%20Waste/Composting%20-%20Yard%20Waste%20-%202019/R2/03Y03_Soundview%20Park_ywc_R2_2019.2020-07-15.AR.pdf

[59] *Can We Have Our Cake and Compost It Too?: An Analysis of Organic Waste Diversion in New York City - Appendix B: Regional Organic Waste Processing Capacity.* (2016, February 2). NY Citizens Budget Commission. https://cbcny.org/sites/default/files/media/files/Appendix%20B%20-%20Organic%20Waste%20Report_0.pdf

[60] *Intro 696-2024. Establishing organic waste composting facilities in each borough.* (2024, March 19). New York City Council. https://legistar.council.nyc.gov/LegislationDetail.aspx?ID=6584165&GUID=E5A5C399-FD39-4EAF-A817-A85511DFBAA1

[61] *The Calgary Composting Facility.* (2025). City of Calgary. https://www.calgary.ca/waste/residential/how-composting-works.html

[62] *6 CRR-NY 361-3.2: Composting Facilities.* (updated 2022, March 15). State Compilation of Codes, Rules, and Regulations of the State of New York. https://govt.westlaw.com/nycrr/Document/

Process for Site Identification

Review

The process began with a research inquiry into the history of organics processing in New York City and comparable programs in other North American cities. This research informed a list of factors for successful composting, specifically in urban and highly-regulated areas. These factors are separate from required regulations for permitting and zoning, which legally bind all organics processing sites.

Feedback

The criteria were shared with the Solid Waste Advisory Boards, as well as New York-based community composters and environmental activist groups. Their feedback was incorporated to formulate the final list of criteria.

Methodology

Based on feedback and interviews, the Land Use team at Brooklyn Borough President Antonio Reynoso's Office collaborated to turn the criteria into a methodology that could be applied to a map of New York City to refine, identify, and rank feasible sites. Included in this work was the processing of qualitative criteria into binary measurables. The first layer of the map highlighted all sites that met the legally necessary characteristics in the 6 CRR-NY 361-3.2, and NYC Zoning Resolution.

Output

Based on research, we determined an appropriate weight for each feasibility factor and scored each site on a scale of 0-1. Sites with a score of 0-.576 were assigned a "low" score, .577-.7 a "medium." and .71-1 a "high."

Other Considerations

Environmental Justice

Historically, waste facilities have been sited in marginalized communities, causing disproportionately high rates of environmental health issues, odor and noise burdens, and dangerous streets. While compost facilities cause fewer health and environmental impacts than co-digestion, landfills, or incinerators, they still have impacts, so communities that are already considered environmental justice areas should receive extra scrutiny when making siting decisions. Because of the lack of standardization in environmental health indicators, we found it difficult to include any data set as a singular weighted criterion in the methodology. Furthermore, given that much of the city is designated as an Environmental Justice Area according to the NYC Mayor's Office of Climate & Environmental Justice, we wanted to avoid excessively eliminating potential sites. In our analysis, we included a criterion of high concentration of existing waste transfer facilities, weighted at 15%. We also included in the criteria the sites' compatibility with the 2006 Solid Waste Management Plan, which goal of shifting waste transfer from trucks to barge and rail when possible. Many sites identified are located on the waterfront, meaning use of barge may be feasible, although location on the waterfront raises other potential concerns about flood protection, which were also taken into account in the criteria. For further environmental justice considerations, we concluded that a site-by-site focus would allow for a more comprehensive and helpful outlook.

Site Economics

Economics is a large component of the implementation of Intro-696 and the operations of compost facilities. In the methodology, criteria such as site vacancy, proximity to trucking routes, and type of ground surface attempt to capture favorable characteristics that would reduce operating and initial investment costs. Because the economics will vary depending on the method of processing compost, we were unable to do a more detailed analysis until this variable is determined for each site. This will be up to site operators to decide.

Types of Composting

Similar to economic factors, site operators will determine whether they use turned windrows, aerated static piles, or in-vessel systems to compost.

State Environmental Quality Review (SEQR) and City Environmental Quality Review (CEQR)

Sites will be subject to environmental review processes at the City and State levels. Because of the community-based steps in this process, it is difficult to capture in binary criteria.

Highlighted Sites

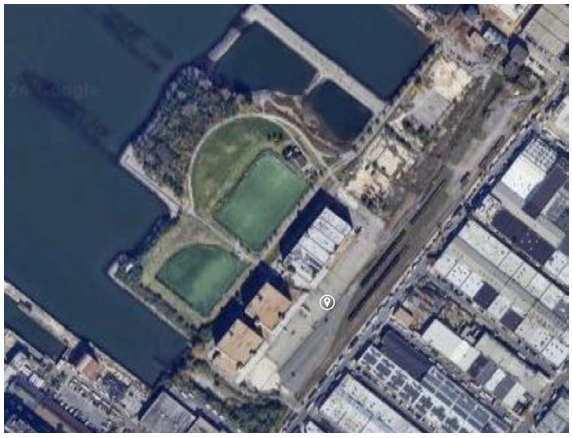
We conducted further research into certain sites ranked favorably by our analysis. The borough of Staten Island already has significant capacity at its DSNY facility, and any expansion would likely be associated with that existing site. Therefore, the borough was excluded from the site-specific research process.

Selected individual feasible lots are further described by borough. It is important to note that:

1. This is not a comprehensive list of all feasible sites; and
2. These sites are included for illustrative purposes only, and their inclusion should not be interpreted as meaning that a specific plan exists to establish a compost facility there.

Brooklyn

Analysis shows that there is more than enough space in Brooklyn to reach 180,000 tons of compost processing capacity.



Land adjacent to Bush Terminal Piers Park between 50th St. and 1st Ave.

This 1,600,000 ft^2 site is owned by the New York City Department of Small Business Services and is located in Sunset Park, near the East River. New York City Economic Development Corporation plans to build a "Made in NYC" campus in the currently vacant building, and local advocates have specifically called for expansion of eco-industrial uses in this area.[61] The train yard on the street-facing side of the lot could support in-vessel composting methods without disrupting rail operations, and could likely process 50-60k tons each year. 1st Avenue, which runs adjacent to the site, is a DOT-designated trucking route.

Floyd Bennett Field

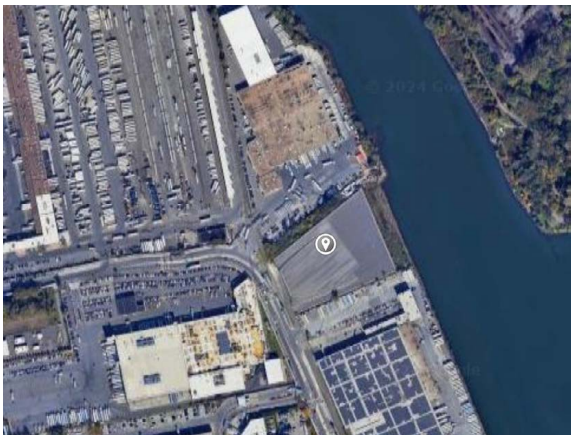
Floyd Bennett Field is part of the Gateway National Recreation Area, and is under the jurisdiction of the National Park Service. It totals 56,628,000 ft^2 and has been undergoing redevelopment for the past few years. There are plans to build an educational campus, including a high school at this site, focusing on "tech, sustainability, and environmental education."[62] Co-siting a compost facility could further these goals, and provide a large-scale facility isolated from permanent residences and businesses. There is enough space to build the facility 500+ yards away from the school campus.

[63] *Green Resilient Industrial District (GRID) Plan 2.0: A Just Transition for Sunset Park.* (2023, August 28). Urban Equity Solutions for United Puerto Ricans Organization of Sunset Park (UPROSE). https://drive.google.com/file/d/1vcs8lGl6T784h-LcZze6oFXlPrurvjLs/view

[64] Kliger, H. (2023, December 1). "Exclusive: New 7-acre educational campus coming to Floyd Bennett field." CBS News. https://www.cbsnews.com/newyork/news/floyd-bennett-field-educational-campus/

The Bronx

Analysis shows that there is more than enough space in The Bronx to reach 180,000 tons of compost processing capacity.



Hunts Point lot, 355 Food Center Dr.

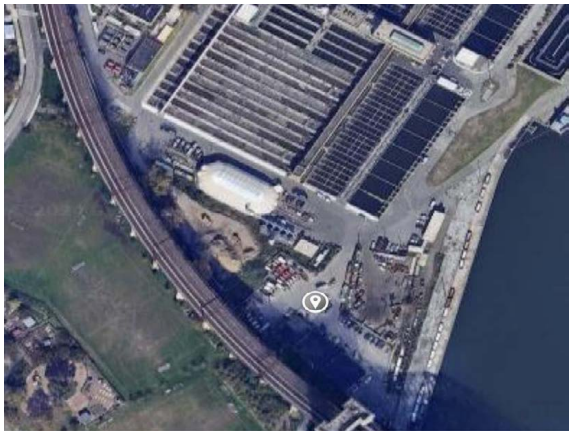
As shown in the image, there is a lot of vacant land and unoccupied parking lots surrounding the Hunts Point Food Market. DSNY has initiated a contract with Denali Waste Solutions to expand their organics processing to the west of the Market, but this is likely for commercial waste. Given that it is the largest produce market in the United States, siting compost nearby would be beneficial. The pinned lot is currently vacant and owned by the New York City Department of Small Business Services. At roughly 220,000 ft^2, it is adjacent to trucking routes and has the possibility for marine transfer. While there already is a high concentration of waste processing facilities in the South Bronx, this facility would be far from residents.

University Heights lot, Exterior St. north of University Heights Bridge

This 160,000 ft^2 lot in the North Bronx is owned by the NYC Department of Transportation, adjacent to the University Heights train station. It is alongside a DOT through route.

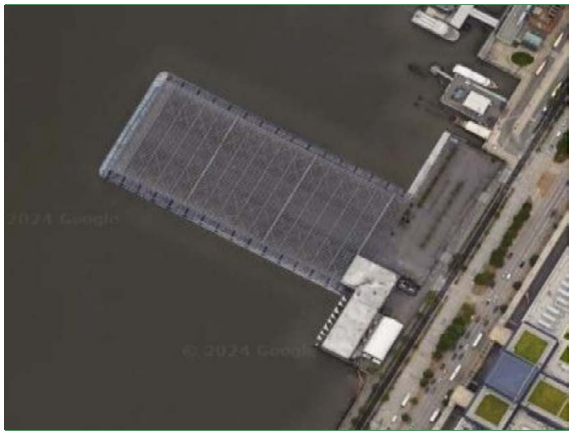
Manhattan

Analysis indicates that without significant land use changes or an increase in community composting capacity, Manhattan is unlikely to reach 180,000 tons of processing capacity.



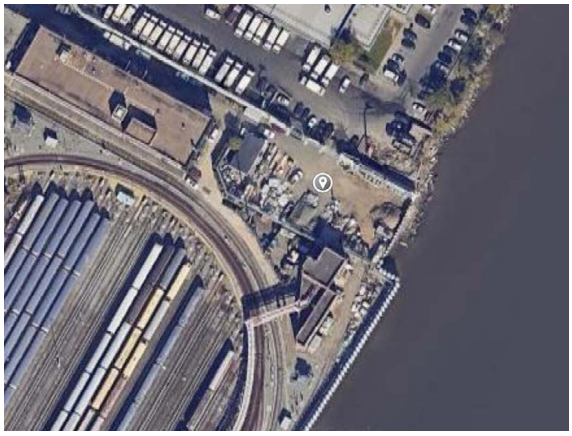
Randalls Island

This space is associated with the Wards Island Wastewater Recovery Facility, which is currently being used as an auxiliary parking lot. It is adjacent to a trucking route and has potential for marine transfer.



Pier 76, Hudson River Park at 37th St.

Pier 76, a part of Hudson River Park, is 588,000 ft^2, and newly paved and undeveloped. The former site of the Manhattan Tow Pound, it was incorporated into the park in 2021 and is now owned by the New York State Office of Parks, Recreation, and Historic Preservation. According to the Hudson River Park Trust, designated a "Park/Commercial" pier by the Hudson River Park Act, this space will eventually host both public parkland and a revenue generating use that will help support the care, maintenance and operations of the Park as a whole."



207th Street Train Yard Parking Lot, 215th St. and 10th Ave.

This site is owned by The New York City Transit Authority and is 20,000 ft^2.

Queens

Analysis shows that there is more than enough space in Queens to reach 180,000 tons of compost processing capacity.

Astoria Parking Lot, 19th Ave. between 45th St. and Hazen St.

This 1,750,000 ft² Astoria lot, labeled as "LaGuardia Discount Parking," and owned by the New York City Department of Small Business Services is near the Bowery Bay Wastewater Recovery Facility. It has a large buffer of trees, which would help minimize any potential negative community impact.

2121 College Point Blvd

This image captures two lots, 388,000 ft², owned by College Point Associates LLC, and 239,000 ft², owned by Ferrera Family Holding Corp. It features a dock along the Flushing Bay waterway and is near College Point Avenue, a DOT trucking route.

Next Steps

Intro-696 has the support of the Brooklyn, Bronx, Manhattan, and Queens Solid Waste Advisory Boards; Brooklyn Borough President Antonio Reynoso; and 24 City Council members at the time of publication. While DSNY has stated its opposition to the legislation, this report aims to refute some of their claims and underscore the feasibility of its implementation. As shown, local siting of composting facilities would have environmental, economic, and public health benefits for the city, and we encourage the City Council to move swiftly to pass this bill.

Appendix

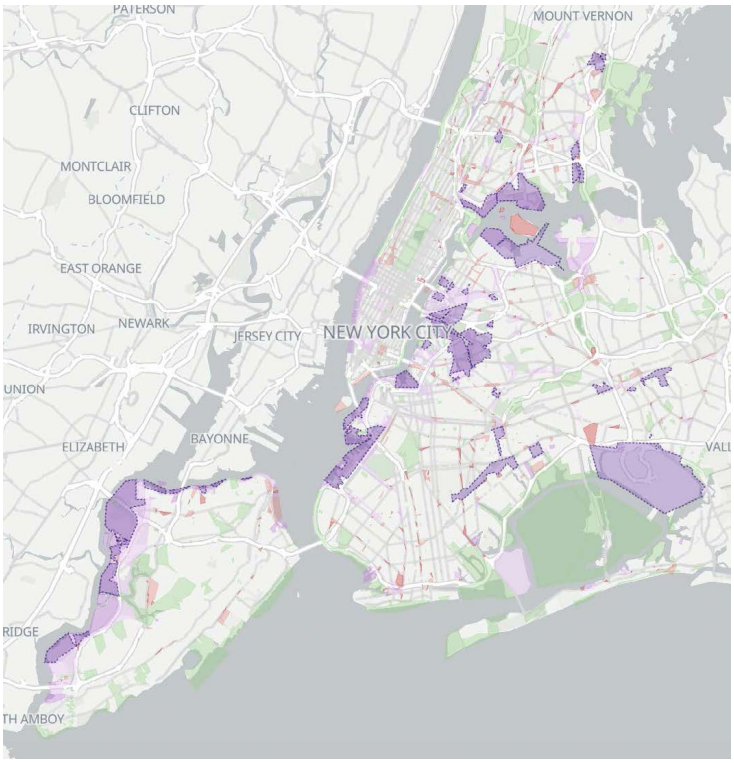
Criteria for Potential Composting Sites Prescribed by Intro-696

Required by State and City Law

- Zoning: Restricted to M, C8, and C4 zoning districts
- Proximity to Residences and Businesses (DEP Requirement): 500+ feet of distance (200+ if yard waste only)
- Bedrock (DEP Requirement): 5+ feet
- Odor Control (DEP Requirement): Map using wind pattern data and surrounding development data
- Proximity to surface water or wetlands (DEP Requirement): 200+ feet, unless additional provisions used to control leachate
- DEP Requirements

Further Criteria

- Access to Sewer
- Site Vacancy: Preference for minimal redevelopment required
- Slope Gradient: Generally, a lesser slope is preferable to gently control leachate and pooling
- Access to Power
- Access to Uncontaminated Water
- Accesses to MS4 Stormwater Drainage System: Municipal Separate Storm Sewer System
- Floodplain Risk: If sited within a Floodplain or Wetland, significant additional protections required
- Ground Material: Impervious surface preferable
- Land Use Compatibility: No significant conflict with other land use priorities. For example, maintaining existing manufacturing land or housing development
- SWMP Compatibility: Compatibility with State and City Solid Waste Management Plan
- Multi-Use Capability: Possible incentives or benefits from co-siting with other waste processing or energy-generating facilities



Map of New York City with Industrial Business Zones highlighted

- Buffer Space: Infrastructure for truck traffic, possible expansion

Environmental Justice Considerations

- Community support
- Trucking burden
- Odor burden
- Noise burden
- Paving burden
- Nearby operational or previous environmental/waste sites
- Benefits go to local community first
- Compliance with Waste Equity (LL 152)
- Possible starting places to look
- Brownfields
- Piers
- Private parks
- Private and public golf courses
- Large vacant buildings

Notable Decisions After Site is Determined Feasible

- Cost Considerations:
    - Costs to Operate the Site:
        - Costs of hauling material in
        - Proximity to organics producers /pickup sites (orange bins, drop-offs)
        - Costs of running the facility (labor, site maintenance, machinery, etc.)
- Initial Costs to Build the Site:
    - Current vacancy status
    - Grants (Brownfield)
      BIG Grants - OER (nyc.gov)
- Type of Composting: Aerated static pile, turned windrows, in-vessel
- Method of Screening: Manual, mechanic
- Method of Stormwater Management: Bioswales / rain gardens, tarps. Link
- Method of Leachate Control: Tarps, sewage hookup, bulking/aerating agents
- Method of Rodent Control: Containers, dogs, traps, poison
- Method of Odor Control: Containers, strategic turning schedules, bulking agents, absorption agents

Methodology

The New York State Department of Environmental Conservation regulates all waste processing facilities in the state. Composting facilities would be subject to their legal guidelines for registered and permitted sites, as well as New York City zoning regulations. Beyond these explicit standards, compost facilities may require a variety of factors to ensure their success. These range from access to public utilities, to convenience of trucking and drop off routes. To capture sites that meet legal requirements, as well possess some favorable characteristics for their feasibility of large-scale composting, we compiled a list of criteria (see above) and sent it to the Solid Waste Advisory Boards for comment. Following feedback, we stratified it in order of importance to create a methodology. This produced a map of the city that identifies possible sites ranked according to their feasibility scores.

This methodology aims to highlight sites potentially available for composting, but does not include detail about which type of composting would be most feasible on each site. Ultimately, the goal is to identify 900,000 cumulative tons of composting capacity for organic waste management—180,000 per borough, to meet the goals of Intro-696. Note that Staten Island's Fresh Kills facility already has 108,000 tons of composting capacity and is the only food compost processing site in New York City currently managed by DSNY. The output of this analysis aims to highlight a selection of parcels that comply with DEC's requirements for compost facilities (6 CRR-NY 361-3.2) and are zoned appropriately for facility creation in NYC.

This review is limited to the characteristics listed and does not consider additional parameters that may be beneficial for further filtering of sites or future creative opportunities.

Compost Mapping Methodology

Essential Criteria

- Zoning (Zoned as M1, M2, M3, C4, or C8). Source: https://zola.planning.nyc.gov/l/lot/3/5936/10#9.72/40.7125/-73.733
- 5+ feet from bedrock. Source: https://www.usgs.gov/data/geospatial-data-bedrock-elevation-and-overburden-thickness-maps-five-boroughs-new-york-city
- 200+ or 500+ feet from residences and businesses. Source: https://www.nyc.gov/content/planning/pages/resources?-search=pluto#datasets
- 200+ or 500+ feet from surface water. Source: https://data.cityofnewyork.us/Environment/NYC-Planimetric-Database-Hydrography/drh3-e2fd

Weighted Criteria

- 17.5%: Slope, less than 4:1. Source: https://www.usgs.gov/data/geospatial-data-bedrock-elevation-and-overburden-thickness-maps-five-boroughs-new-york-city
- 17.5%: Currently vacant or used as a parking lot. Source: https://www.nyc.gov/site/planning/data-maps/open-data/dwn-pluto-mappluto.page
- 15%: Outside of an area with a high concentration of waste facilities. Source: https://experience.arcgis.com/experience/6a3da7b-920f248af961554bdf01d668b
- 10%: Outside of flooding during heavy rain events. Source: https://experience.arcgis.com/experience/6f4cc60710dc-433585790cd2b4b5dd0e
- 10%: Outside of a wetland. Source: https://data.cityofnewyork.us/dataset/NYC-Wetlands/p48c-iqtu/data
- 10% Outside of the combined sewer network. Source: https://opendata.cityofnewyork.us/projects/open-sewer-atlas-nyc/
- 10%: Within .25 miles of Department of Transportation's trucking routes. Source: https://data.cityofnewyork.us/Transportation/New-York-City-Truck-Routes-Map-/wnu3-egq7
- 5%: Impervious ground surface. Source: https://www.usgs.gov/data/geospatial-data-bedrock-elevation-and-overburden-thickness-maps-five-boroughs-new-york-city
- 5%: Outside of 2050 100 year floodplain. Source: https://data.cityofnewyork.us/Environment/Sea-Level-Rise-Maps-2050s-100-year-Floodplain-/hbw8-2bah

Expanding Composting in New York City:

The Case for Passing and Implementing **Intro-0696-2024**

Released September 2025

BROOKLYN BOROUGH PRESIDENT
ANTONIO REYNOSO

Testimony of Rhonda Keyser, Cafeteria Culture to
New York City Council Committee on Sanitation and Solid Waste Management
Oversight - Engagement for the City's Draft 2026 Solid Waste Management Plan
250 Broadway - 8th Floor - Hearing Room 1
December 9, 2025

Good morning and thank you, Chair Abreu and the Sanitation Committee for this opportunity to speak.

I am Rhonda Keyser, Program and Policy Director for Cafeteria Culture. We are an environmental education organization. Our students become climate leaders by taking action in their own school cafeterias. They have sparked system-wide change that scales quickly across NYC, the largest school district in the country, and to other districts. We helped catalyze the elimination of styrofoam from school cafeterias across the country. Our students started monthly Plastic Free Lunch Days in New York City Public Schools and twice a year nationwide.

Because of our students' work around Plastic Free Lunch Day, single-use plastic in school lunch service has reduced on REGULAR lunch service days. It's down from 5.7 pieces per student in 2022 to 1.8 pieces per student this past 2024-25 school year.

We are now piloting systemic food waste reduction measures combined with local community composting. In five pilots so far, students have reduced overall cafeteria food waste by 50% and actually increased student consumption by 15-46% just by allowing students to choose what they want to eat within the USDA guidelines. These numbers show that this food waste reduction is not about imposing systems of scarcity or austerity on the student lunch time , but instead about giving students a sense of agency.

Our students mapped the journey of their trash and their organics placed into the brown bin going to co-digestion. After considering truck traffic and other environmental harms for each of these waste streams, they wanted to disrupt these harmful systems.

So our students started a Community Compost Day once a week where they divert 50-100 pounds a week – all of their cafeteria food scraps for this one day and process them locally at Compost Power's compost site at nearby Polo Grounds, a NYCHA property. Our staff walks the food scraps to Polo Grounds where Compost Power hires local neighbors to process these scraps. Students make frequent field trips to participate in processing their food scraps and turn what is otherwise a waste burden into a resource that is accessible to them so they can grow healthy food, create healthy soil, and raise the wellbeing of their own community.

As a bonus, we are noticing a reduction in the contamination in the organics bin on regular collection days in their cafeteria as students have gained more agency in their food scraps processing.

We hope to continue piloting local composting of cafeteria school food in other parts of the city to scale this food waste reduction along with our plastic waste reduction victories.

We urge the council to pass Councilwoman Nurse's Intro 696 that prioritizes composting over codigestion to prioritize food waste. Attached, please find "Expanding Composting in New York City, The Case for Passing and Implementing Intro 696" for more information.

We encourage DSNY to consider community composting as a significant part of New York City's organics processing capacity, to make healthy soil, to grow local food, and cut down on pollution for all communities.

Testimony of Cafeteria Culture 5th graders from PS/MS 46, Arthur Tappan School
to New York City Council Committee on Sanitation and Solid Waste Management
Oversight - Engagement for the City's Draft 2026 Solid Waste Management Plan
250 Broadway - 8th Floor - Hearing Room 1
December 9, 2025

Good morning and thank you, Chair Abreu and the Sanitation Committee for giving us this chance to speak today.

We are 5th graders from PS/MS 46 in Harlem. The 10-year Solid Waste Management Plan is very important to us, because in ten years we'll be adults. We'll be responsible for the problems that are being created now.

We live in an Environmental Justice Zone in Harlem with a lot of truck traffic. Garbage trucks come through our neighborhood on their way to incinerators and landfills. Cafeteria Culture taught us that there is no "away" for our trash. We learned that when our trash leaves our homes or our school first it goes to a waste transfer station nearby, then to Staten Island, then to Newark, New Jersey, and then finally, it goes on a train to Niagara or Delaware to be burned in an incinerator. The leftover ashes go to a final landfill somewhere else!

All of that transportation creates pollution. And the INCINERATORS create pollution. And the LANDFILLS make greenhouse gases. This hurts the planet AND the people who live nearby. One in 4 kids has asthma in Newark, New Jersey because of the incinerator there! Kids just like us get asthma for LIFE because of something out of their CONTROL. This can NOT go on for another 10 years. We have to disrupt this HARMFUL system. The other option we have is the brown bin, which is better than trash bins, but there are still many trucks taking the food waste to a lot of places. And our community doesn't even HAVE brown bins at NYCHA houses where many of us live.

With Cafeteria Culture and Compost Power we take OUR food waste OUT of this system and we compost it locally at nearby NYCHA Polo Grounds. It's less than one block away! And…NO TRUCKS!

Compost Power at Polo Grounds makes COMPOST out of our food scraps! And they hire our neighbors to work there. We think EVERYBODY should be able to compost their food scraps in their communities too!

The Solid Waste Management Plan needs to include local composting all across New York City to make healthy soil, to grow food, and cut down on pollution for ALL communities! Thank you for listening!

Center for Zero Waste Design

Contact: Clare Miflin
clare@centerforzerowastedesign.org
+1 917-254 7453

Testimony for SWMP:

To: City Council
From: Clare Miflin, Center for Zero Waste Design
Date: December 12th, 2025

This testimony is mainly based on DSNY's presentation on the 2026 Solid Waste Management Plan, but will be updated to refer to the full draft, and sent in before the January deadline. We would like to respectfully submit the following comments, questions and ideas for consideration:

Solid Waste at a Glance

Access to the datasets DSNY is using to prepare the SWMP will be immensely helpful for the public, academia and organizations seeking to understand and support improved data management.

- Will DSNY be sharing data sources for residential, commercial and C&D waste tonnages?
- Will there be an opportunity for external groups and/or the public to provide input on and/or suggest additional data sources?
- Will relevant datasets be made available though OpenData as SWMP development and implementation proceeds?

SWMP26 Programs

1. Waste Prevention and Reuse

a. As this requires collaboration with other city entities, will the plan include which entities have been or will be involved, such as DOE, CUNY, SUNY, EDC, Library systems, Governors Island?
b. DonateNYC - Will the plan include a review of current programs including donateNYC is working ? We recommend a robust assessment to see where it can be improved / expanded.
c. Packaging reuse
    i. Will the plan include an analysis of how the potential passage of a NYS EPR bill will impact DSNY planning or change DSNY initiatives?
    ii. Will DSNY consider financially supporting a reusable to-go container pilot, for example on Governors Island?

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iii. We recommend including a plan to work with DOE to move to reusable trays in NYC schools, and identifying what agencies/offices would need to be involved to operationalize.
iv. Will your plan include any initiatives to work with the city / city council on policy reforms, such as requiring reusables for dine-in food halls, per Sandy Nurse bill.

d. Expand Reuse and Repair locations.
   i. Consider working with NYC Libraries to support expansion of lending beyond books, for example tools, musical instruments etc
e. Promote development of "eco-industrial parks" - places with processing and interchange of post-consumer materials.

2. Organics Diversion & Recovery
   a. "Prior to the implementation of the Citywide Residential Organics Program, most of the organic waste generated by residents, institutions, and businesses was discarded as refuse and sent to landfills or incinerators." - we find this statement a little misleading, as ±90% (per Samantha Macbride Spring 2025 assessment) still is discarded as refuse. We believe that data transparency is key, and DSNY should not make misleading statements about how much diversion there is.
   b. Finish the comprehensive organics study which was started by Arcadis.
   c. Increase the recovery rate of DSNY managed organics
      i. We expect leaves and yard waste within organics collection can't be easily separated at the CORE facility. Can DSNY figure out a process where more yard waste and leaves are sent to be composted? Could there be at a minimum seasonal residential leaf collection, and collections of leaves and yard waste from Parks and NYCHA, which go straight to compost facilities?
   d. How will DSNY increase the quality and quantity of organic waste? We have some suggestions below:
      i. Figure out how to make brown bins work for large multifamily buildings, including:
         1. Promote and assess use of equipment in buildings to pre-process organic waste or turn it into fertilizer (like Harp in the Peninsula and Chestnut Commons, or BioGreen 360 in commercial buildings)

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2. Work with buildings to pilot different options for on-floor containers, such as a caddy swap, providing biobags and caddies, or more education - and evaluate for capture rates and quality

e. Evaluate the different options for organics processing, as part of the organics study or otherwise, to determine if increasing co-digestion is a good idea, or whether stand alone AD, pretreatment and transport to out of city compost sites or other is the best option.
   i. Increase organics processing capacity within and close to the city.
   ii. Consider the issues with PFAS in reuse of residual sludge from co-digested AD, and possible future legal restrictions for any beneficial use.
   iii. Consider policies to ban organics from landfill and WtE

f. Increase in-city use of organic-derived products
   i. Work with DEP to incentivize more use of local compost on city soils to increase stormwater infiltration. Test, pilot, include it in stormwater guidelines and in Parks and greenspace management practices. Collaborate with State DEC to see whether a statewide policy, like WA Soils for Salmon, can be developed.

g. Community composting is currently funded by City Council - we strongly believe that DSNY should baseline and expand funding for the NY Community Compost Network within its own budget, and expand education citywide.
   i. Can DSNY work with Parks to support composting in Parks per the local law 118 by developing design and operations guidelines, providing funding, and encouraging collaboration with community compost organizations and including community food scraps?

h. Add support for regional use of large volume good quality food scraps – eg from commercial food service entities, Hunts Point produce market, and elsewhere. We understand that the GrowNYC regional farm hub sends food scraps to drain, and Hunts Point produce market does not separate food scraps from trash.

i. Schools - work with all schools to ensure they separate the compostable trays and food waste.

3. Residential Recycling

a. Waste Containerization - We believe that the current rules and plans for trash-only containerization will reduce waste diversion and would suggest improvements that

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would be better for diversion, labor and the quality of NYC streets. For more see our On Containerization Report, and shorter pitch document. We would like to see our alternative recommendations for waste containerization piloted and evaluated against the current plans in terms of waste diversion, labor, costs to buildings and DSNY, streetscape cleanliness and number of bins on sidewalks.

b. Study Save-as-you-Throw as a means to incentivize better waste diversion. Consider other incentives or penalties, like local law 97 which incentivizes energy upgrades for larger multifamilies. Develop zero waste consultant requirements, like in San Francisco, to work with underperforming buildings.

4. Residential MSW
    a. Analyze and develop plans for better collection, including
        i. Pneumatic collection in viable areas, such as High Line, Second Avenue Subway planned construction, 34th Street West Side development area, MTA #7 from Court Square to Citifield
        ii. Improving waste containerization in terms of impacts to quality of life (too many bins on sidewalks) and to improve labor for building and DSNY workers. See our On Containerization Report, and shorter pitch document.
    b. When analysing advanced thermal treatment of residual waste, ensure that any facility is sized small enough to align with the city's zero waste goals.

5. Commercial Waste
    a. Do a comprehensive analysis of incentive structures and strategies to ensure Commercial Waste Zoning incentivizes haulers to:
        i. Use City facilities - transfer stations and processing facilities for organics, and recyclables and residuals to achieve the mileage reductions and financial benefits of flow control.
        ii. Divert recycling and organic waste
        iii. Provide infrastructure – eg shared containers on street, pre-processing equipment for organics, which will also improve collection logistics and streetscapes. (Also note there will be legal changes necessary for infrastructure and contracts to be shared between multiple commercial entities.)

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iv. Reduce truck miles. Consider reducing the number of haulers to further reduce truck mileage and incentivize on-street and neighborhood infrastructure investments.

b. Enforce the mandatory organics separation rules before expanding them.

6. C&D waste
    a. Work with EDC on circular construction guidelines, get data, and see if can get other city agencies to follow them
    b. Pass policies such as mandatory ceiling tile and GWB diversion (was part of green codes task force)
    c. Promote development of infrastructure to support reuse of building materials, eg. eco-industrial parks.

7. Special Waste
    a. Increase local convenient options for disposal of additional waste streams - SAFE materials, textiles.

8. Education and Outreach
    a. Restart education of supers and peer-to-peer training
    b. Work with community organizations for education and outreach for tangible learning opportunities wherever possible - community compost organizations and repair organizations etc.

9. Executive Order 223

Civics United for Railroad Environmental Solutions CURES

Thank you, Chair Abreu for this opportunity to testify, and for your excellent public service as Chair of the NYC Council's Committee on Sanitation and Solid Waste Management. I am a co-founder and Board Member of Civics United for Railroad Environmental Solutions, which was founded in Queens in 2009 to advocate for modernization of freight rail in the MTA's right of way.

Since Harry Szarpanski of DSNY's Bureau of Long Term Export set up the city's waste-by-rail contracts, this new industry has grown exponentially and attracted international investors -- notably Macquarie. Today city and private haulers' waste-by-rail tonnage comprises more than a third of all the rail freight traffic on Long Island. The 2026 Draft SWMP and this morning's testimony brag about DSNY's waste-by-rail export, but what are the actual impacts on residents as a result of using rail?

First of all changing export transport modes from truck to rail doesn't do anything to reduce the tonnage or toxicity of waste export, or the adverse impacts on residents in communities where waste is hauled, processed, incinerated, and landfilled. As noted by speakers today, the 2026 Draft SWMP's vague language does not set forth plans to mitigate these problems.

Second, while waste-by-rail does eliminate some trucks that export waste from the city, waste is always brought to waste-by-rail transfer station by trucks. So in every place where there is a waste-by-rail transfer station there are diesel trucks coming and going. Also, noisy, high polluting 1970's locomotives are used to haul waste-by-rail. In addition, even when rail is used, the last mile also can be by truck, such as at the Reworld incinerator in Chester, PA.

Other community burdens include rail cars hauling cans of municipal solid waste that can stink up neighborhoods and attract vectors. Waste characterization studies show that a third of this waste is organics that should be composted, not shipped by rail to landfills or incinerators.

Also, rail cars without solid covers on top and with drains in the bottoms of the rail cars are used to haul crushed construction and demolition debris that New York State assumes contain toxics -- such as asbestos, pesticides, volatile and semi-volatile organic compounds, and heavy metals. There is no reason why the public should continue to be harmed by these uncovered rail cars since a NYS Law went into effect in January 2024 that requires solid covers on rail cars of C&D. However, the industry has decided to fight this modestly protective state law in federal court, the Southern District of New York. Judge Ronnie Abrams says that the trial will take place in 2026 (Case 1:24-cv-00135-RA Document 53 Filed 06/06/25).

Following is a complaint CURES received in October 2025. It describes what it is like to be a resident living near freight rail operations in Queens, which include waste-by-rail export of NYC MSW from Review Ave. and Varick Ave, as well as C&D export. Below that is the response from

the MTA-LIRR's freight rail concessionaire, saying that what the resident describes is "normal". I am sure we can all agree that reducing such health, environmental, and quality of life problems by capturing and diverting organics from MSW-by-rail is where focused, concerted 2026 SWMP planning and action need to be directed:

Resident: ***"Can you do something about the train that slams its brakes near Fresh Pond Road train yard? It causes house to shake and sound is deafening at this late at night. It really is upsetting. When it brakes it causes the entire block to shake. It's getting worse and worse. Our whole block is suffering. They park the train cars there and it smells terrible like diesel fuel. They constantly leave the train running. The train is also very loud at all times of the day even up until 10pm. My mom cannot even open her window because of the smell."***

LIRR freight rail concessionaire: ***"We also want to make clear that all the operations that evening were entirely normal, outside of the extra train. We avoid any unnecessary noises that can occur when switching cars - particularly the 'kicking' of cars and any locomotive idling, neither of which occurred - so what was heard were just the sounds of normal switching activity coming from three separate trains, two of which were operating at the same time."***

The 2026 Draft SWMP needs to be rewritten to include specific plans and timetables for increasing the capture and diversion of organics now winding up in waste-by-rail, as well as specific plans to accurately track C&D and recycle it, for example by diverting gypsum wallboard construction debris from waste-by-rail to disposal, and instead recycling the gypsum, which is a mined mineral.

Given the deficiencies of the Draft SWMP raised at this December 9, 2025 hearing, and the scant opportunities for public review and input on the actual plan to date -- with DSNY reporting just 18 comments received -- we ask the City Council to give more opportunities for review, input, questions, and revision of the Draft SWMP (based on Council, Mayoral, and public input next year) before the plan is submitted to DEC. We heard today that DSNY and Inch and Meter have worked on the Draft SWMP since 2022. DSNY only released it on October 1, 2025, initially giving just 45 days to review it, and holding just one public presentation. DSNY's January submission timeline appears arbitrary. DEC's LSWMP page shows the current NYC SWMP does not expire until after October 26, 2026, as well as a broad range of responses to this state planning requirement: https://dec.ny.gov/environmental-protection/waste-management/solid-waste-management-planning/status-of-local-plans Thank you so much again for this opportunity to testify.

Mary Arnold, Board Member & Co-Founder, Civics United for Railroad Environmental Solutions Inc. - civicsunited@gmail.com

Submitted December 9, 2025

New York City Environmental Justice Alliance
462 36th Street, 3F, Brooklyn, NY 11232 | www.NYC-EJA.org
On the ground — and at the table.

Testimony on the City's 2026 Solid Waste Management Plan - Committee on Sanitation and Solid Waste Management
New York City Council
December 8th, 2025

Founded in 1991, the New York City Environmental Justice Alliance (NYC-EJA) is a non-profit, 501(c)3 citywide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their struggle for environmental justice. NYC-EJA empowers its member organizations to advocate for improved environmental conditions and against inequitable environmental burdens by the coordination of campaigns designed to inform City and State policies. Through our efforts, member organizations coalesce around specific common issues that threaten the ability of low-income communities of color to thrive. NYC-EJA is led by the community-based organizations that it serves. NYC-EJA is also a founding member of Transform Don't Trash (TDT), a longstanding coalition of environmental justice, labor, and climate organizations working to transform New York City's sprawling solid waste management systems to be far more equitable, efficient, sustainable, and safe for workers and the communities most affected by solid waste infrastructure.

In New York City, over 14 million tons of garbage are produced daily, generating massive transportation and pollution impacts from privately owned and operated waste transfer stations. While the total amount of waste handled at private transfer stations has decreased approximately 17% since LL 152, the current solid waste system is still an ongoing environmental injustice in which five community districts handle nearly 24 waste facilities while 45 community districts have no waste facilities at all. These communities have historically had the highest rates of asthma such as North Brooklyn, the South Bronx, and Southeast Queens according to the City’s comptrollers audit report on Fair share compliance. Despite laws intended to change this, these communities of color continue to deal with far more than their fair share of heavy truck traffic, safety hazards, pollution, noise, and odor that other neighborhoods are spared.

The 2026 Solid Waste Management Plan (SMWP) should commit the City to move forward with the unfulfilled strategy of the current 2006 SWMP of using municipal marine transfer stations to accept commercial waste which environmental justice communities have long advocated for. DSNY reports have estimated that fully implementing the use of Marine Transfer Stations (MTS) would decrease truck traffic associated with commercial waste collection by 50% citywide, as measured in vehicle miles traveled, reducing both the number of trips and the lengths of collection routes for commercial waste, resulting in corresponding reductions in air pollutant emissions and noise, as well as improvements in traffic safety. A Final Environmental Impact

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Statement (FEIS) for the 2006 SWMP was conducted to evaluate plans to accept 3.772 tons of commercial waste collected by private haulers at four marine transfer stations during overnight hours. However, permit and tonnage data released by DSNY shows that several marine transfer facilities still handle far less waste than their permits allow, ultimately delaying relief to environmental justice communities.

We continue to strongly support the rapid implementation of Local Law 199 of 2019, also known as the commercial waste zone law, mandating a citywide transition for how our commercial waste is handled. We are pleased that the City has advanced the roll out of some zones, however, we strongly urge the city to fully implement all zones by 2026. The clear intent of this law is to simultaneously make the current inefficient, dangerous, and polluting commercial waste system far more transparent, accountable, efficient, and safe while giving the City the tools it needs to sharply incentivize reductions in the vast amounts of commercial waste disposed of in landfills and incinerators. We call on DSNY to fulfill the waste equity goals of the current 2006 SWMP by planning for designated haulers in these new zones to maximize use of marine and rail transfer facilities and ensure that these facilities are competitively priced to incentivize haulers to utilize these efficiently located marine facilities. This is something DSNY can and should be evaluating as CWZ comes online such as southwest Brooklyn, northeast Queens and the Bronx. Additionally, the public should be able to easily access designated haulers diversion plans, customer education and VMT reduction plans to increase transparency.

It's imperative that this upcoming SWMP considers GHG and co-pollutant reductions on disadvantaged communities to be consistent with State and City law. New York's Climate Leadership and Community Protection Act (CLCPA) passed in 2019 obligating state agencies and entities, including the Department of Environmental Conservation (DEC), to ensure that all agency actions are consistent with a 40% reduction in statewide GHG emissions by 2030 and to prevent or mitigate disproportionate environmental burdens on Disadvantaged Communities (or DACs).

Similarly, local law requires DSNY to meet rigorous waste diversion goals within the next local solid waste planning period. Notably, Local Laws 85 and 86 of 2023 establish a goal of diverting 100% of recyclable materials from landfills and incinerators by 2030, and require planning to maximize the use of composting as a method of recycling organic waste during the next SWMP. With the Gansevoort Peninsula delayed indefinitely as the City has placed an artificial beach on the proposed site, the next SWMP must ensure that there is ample capacity at existing and future waterfront sites to export the Manhattan residential and commercial waste and recyclables via barge. Additionally, municipal composting sites are necessary to process increasing amounts of food and yard waste separated by both residents and businesses as landmark curbside composting and commercial waste zones programs are fully implemented.

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These facilities could efficiently recycle millions of tons of organic waste per day, reducing the need for expensive and environmentally harmful waste export, reducing distances traveled by compost collection trucks, and creating good local jobs in our communities. Environmentally, these facilities are far preferable to anaerobic co-digestion facilities where food waste is added to sewage sludge to produce biogas. National Grid's co-digestion pilot at Newtown Creek has resulted in excessive methane gas flaring and perpetuates the use of harmful fossil gas infrastructure and gas combustion systems in buildings. We call on the City to expand the categories of businesses that can be designated by the Department of Sanitation to 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. Additionally, the City should commit to downsizing and ultimately ending contracts with “waste to energy” facilities outside of the City such as in Essex County which further imposes environmental harm on other overburdened environmental justice communities.

The fight for waste equity, cleaner air, healthier and safer communities continues as we work to ensure not only that the City handles its trash and siting of waste transfer stations more equitably, but also reduces its greenhouse and co-pollutant emissions by transitioning to greener, alternative methods of solid waste management. NYC-EJA alongside TDT looks forward to continued engagement with the Committee on Sanitation and other Council Members representing impacted communities to ensure that we continue to make rapid progress toward a more sustainable and just future.

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 Engagement for the City's 2026 Solid Waste Management Plan
December 9, 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 and members of the Sanitation Committee for the opportunity to comment.

One of NYLCV's top policy priorities is achieving our zero waste by 2030 goal to not only curb our greenhouse gas emissions but to send less waste to landfills, which are disproportionately located in low income communities and communities of color. The higher rates of pollution from landfills and incinerators in these communities cause disproportionately higher cases of asthma, cancer, and other health issues and compound already existing environmental and racial inequities. Due to these environmental injustices, the City needs to do everything in its power to continue moving towards organic waste recycling in order to further environmental justice, reduce emissions, improve our quality of life, and get us on track with our zero waste reduction goals.

NYLCV supports the overall goals of DSNY's draft NYC 2026 Solid Waste Management Plan (SWMP26), which outlines a path for the reduction, recovery, and responsible management of New York City's residential, institutional, commercial, special, and C&D waste for the next decade and, when possible, lay the groundwork for waste management practices in the decades beyond.

With that said, there are major waste-related laws and goals that DSNY still needs to fully implement and ramp up funding for outreach and education efforts, including, but not limited to, the Commercial Waste Zones law, the Zero Waste Act of 2023, the zero waste goals outlined in *PlaNYC: Getting Sustainability Done*, and increasing the city's recycling rates through education, outreach, and enforcement. We also urge DSNY to align its waste planning efforts with other city and state initiatives, including (but not limited to) the NYS SWMP, the development of the NYC Environmental Justice for All Plan, the NYC Urban Forest Plan, and any future *PlaNYC* initiatives.

Our city needs to move towards a system where we reduce waste in the first place in order to minimize the burden of waste on environmental justice communities (whether in New York City or beyond), and a system where resources are reused and recovered. For all of these initiatives,

investing in our city's waste management system is an investment in green jobs and we urge DSNY to continue working towards a circular economy.

Commercial Waste Zones

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 of private sanitation companies and five carters to provide containerized commercial waste collection services from dumpsters and compactors citywide, all selected through a competitive bid process (awardees). The resulting contracts with the awardees include standards for pricing, customer service, safety, environmental health, and requirements to promote the City's commitment to recycling and sustainability.

The Department previously set the implementation start and end dates for the first five CWZs: Queens Central, Bronx East, Bronx West, Queens Northeast, and Brooklyn South, and the next two CWZs proposed are Queens West and Lower Manhattan, both starting on April 1, 2026. This means DSNY still has thirteen CWZs remaining to implement. **NYLCV recommends the following when it comes to the implementation of this law:**

- NYLCV stands with advocates calling on DSNY to release an implementation timeline for the entire CWZs system by the end of 2026. We hope the City will dedicate the requisite amount of resources and funding for staffing, education, and outreach to fully implement the CWZ law and incentivize businesses and haulers to improve their recycling rates.
- NYLCV urges DSNY to continue working towards transitioning to zero-emission vehicles for 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.
- Lastly, we urge the next Mayoral Administration to work with the City Council in expanding commercial organics separation requirements to all food businesses by the end of 2026. This expansion must be complemented with robust outreach, education, and enforcement.

Waste Equity

NYLCV supports the goals set out in Local Law 152 of 2018, the Waste Equity Law, to reduce waste transfer capacity in the three most impacted communities, namely Brooklyn Community District 1, Queens Community District 12, and Bronx Community Districts 1 and 2, while prohibiting increases in the amounts of waste that could be sent to facilities in communities already handling more than 10% of the City's trash. **In order to continue furthering environmental justice, NYLCV recommends the following:**

- DSNY should accept and process commercial solid waste at all city-owned or operated marine and rail transfer stations, and to publicly report the amount and type of waste

received at such stations on an annual basis. DSNY's marine transfer stations (one in Manhattan, two in Brooklyn, and one in Queens) have reduced long-range truck traffic and associated climate and air pollution by containerizing and transporting municipal solid waste via barge and rail, more fuel efficient modes of transportation that avoid congested highway bridges and tunnels.

Zero Waste Act of 2023

NYLCV strongly supported the Zero Waste Act of 2023, which included Local Laws 85 (establishing a mandatory residential curbside organics collection), 86 (establishing a goal of zero divertible waste for New York City by 2030), 87 (requiring reporting on waste diversion), 88 (requiring DSNY to hold community reuse and recycling events in every community board district), and 89 (mandating that DSNY establish and operate no fewer than 30 organic waste drop-off sites citywide). **NYLCV urges DSNY to continue implementing and funding these laws in order to increase waste diversion rates and bring us closer to zero waste by 2030.**

Organics

In order to make our city cleaner, more sustainable, and work towards reaching our zero waste goals, NYLCV strongly supports organic waste recycling as well as reducing our food waste in the first place. When it comes to the City's residential organics program laid out in Local Law 85, we are pleased to see that the 2025 Mayor's Management Report stated that in Fiscal 2025, DSNY disposed of 3,154,600 tons of refuse—two percent less than Fiscal 2024, and the lowest total in 15 years. The Department diverted 166,500 tons of organic waste in Fiscal 2025, a 29 percent increase from Fiscal 2024, a historic high. We hope our city continues to reduce the amount of refuse disposed to landfills in the future and makes progress on its recycling goals. **Below are recommendations to ensure organic waste recycling is prioritized in the coming years:**

- First, DSNY must immediately reinstate the City's enforcement and fine system as part of Local Law 85 of 2023, establishing a mandatory citywide residential curbside organics program.
- NYLCV urges DSNY to increase staffing ramp up outreach, education, and enforcement efforts for the residential organics program, including ensuring that any educational materials are in the designated citywide languages and any other language deemed appropriate. DSNY must leverage connections to local organizations, elected officials, and Community Boards to educate residents about this program in order to change behaviors when it comes to recycling organic waste.
- DSNY must continue supporting and working with the Community Composting Network and other local organizations to build awareness and change behavior towards organic waste recycling.
- As stated above, we urge the next Mayoral Administration to work with the City Council in expanding commercial organics separation requirements to all food businesses by the end of 2026. This was a goal stated in *PlaNYC: Getting Sustainability Done*.

- To the extent feasible, DSNY should continue investing in composting infrastructure throughout the city, including fulfilling the requirements of Local Law 118 of 2024, which relates to establishing composting facilities in parks.
    - NYLCV supports DSNY's strategy to work with community composters to operate a composting facility on DSNY property in Gowanus, Brooklyn.
    - We also support DSNY's involvement in reenvisioning how Rikers Island could be utilized for climate infrastructure, including more city-owned composting facilities, as well as working with community gardens to improve local composting and job growth.
- As a member of Forest for All NYC, we urge DSNY to collaborate with other city agencies to develop a tree wood reuse program in order to utilize reclaimed wood instead of sending it to landfills. Additionally, we support DSNY's involvement in the development of the city's first Urban Forest Plan, as required by Local Law 148 of 2023.

Recycling

Despite the passage of Local Law 19 of 1989, establishing the citywide mandatory recycling program for residents, institutions, and businesses, and the strides over the past couple of years passing waste legislation, according to DSNY's 2023 Waste Characterization Study, "much of what could be recycled was not separated for recycling. Approximately one-third of the materials DSNY collected curbside were recyclable metals, glass, plastics (MGP), and paper—about 1 million tons of DSNY managed waste that could have been recovered in 2023. However, of that amount, only about 600,000 tons of MGP and paper (60%) were separated for recycling by residents and institutions." Additionally, the study stated that metal, glass, plastic and paper recycling outcomes have declined from previous study years; capture rates have decreased, while contamination rates have increased. It's clear that New York City still has a long way to go when it comes to recycling rates and enforcement. **NYLCV recommends the following when it comes to improving the city's residential and commercial recycling rates:**

- NYLCV supports DSNY's overall goal of improving and expanding residential and commercial recycling recovery efforts. Most importantly, this means the City must increase funding for DSNY staffing to educate and enforce in order to increase the diversion of materials collected curbside. Regardless of the specific type of materials, DSNY needs to hold more in-person recycling drop-off events in accessible areas of the city, whether it's for e-waste, textiles, or paint. DSNY must mobilize a citywide network of local organizations, elected officials, Community Boards in order to increase awareness and education about recycling, as well as door-to-door neighborhood multilingual canvassing.
- Textiles:
    - We support DSNY's goal of increasing awareness and accessibility of textile recycling efforts, including establishing textile collection options for all city households and institutions, with additional events and appointment-based pick-up for low-rise buildings (buildings with fewer than 10 units), which were previously excluded from collection programs.

    - DSNY should ramp up outreach and education efforts when it comes to building awareness of the Department's ReFashion NYC program, which works in cooperation with partners like Housing Works and Wearable Collections to offer textile recycling to New York City apartment buildings of ten or more units.
    - Additionally, we support DSNY's goal of improving enforcement of the recycling requirement for businesses whose waste is made up of more than 10% textiles.
- Packaging Reuse and Reduction:
    - We support DSNY's goal of promoting packaging reuse and reducing the amount of packaging used and disposed of. Below we outline more on our support for an extended producer responsibility (EPR) law at the state level.
    - We also urge DSNY to continue working with the Department of Consumer and Worker Protection (DCWP) to enforce Local Law 17 of 2023, which prohibits food service establishments and food delivery platforms and couriers from providing utensils, extra containers, napkins, and condiment packets unless requested by customers. Along with other recycling outreach efforts, DSNY should work with DCWP to improve outreach and education efforts for businesses, third party delivery apps, and customers.
    - NYLCV supports DSNY's efforts to explore innovative pilot programs such as a Container Reuse Pilot, such as a bring-your-own or exchange programs, and Large Venue Container Reuse Pilot. We hope DSNY will explore and implement new container reuse pilot programs under the next Mayoral Administration.
- We support DSNY's goal of continuing to hold expanded hours at Special Waste Drop-Off Sites in compliance with Local Law 88 of 2023. We also recommend that DSNY hold more frequent events for DSNY SAFE (Solvents, Automotive, Flammables, and Electronics).
- Additionally, DSNY should research and test new technology to ingest compostable materials (like containers) since so many of those products are being utilized now.

Waste Infrastructure

When it comes to DSNY's waste-related infrastructure, we recommend the following:

- Take action to upgrade the City's wastewater treatment plants' digesters to process organic waste into renewable energy to reduce local pollution and help address food waste, including exploring the feasibility of public-private partnerships. We also support DSNY's goal of evaluating opportunities for co-location of new and innovative wastewater and/or organics waste management infrastructure at city-owned properties, including locations that have been previously evaluated, such as Rikers Island; expanding codigestion and beneficial use of biosolids and biogas; and pursuing the goal of 100% diversion of biosolids from landfills by 2030 by diversifying end-use sites and vendors.
- Containerization:
    - NYLCV supports DSNY's efforts to containerize our waste since it will reduce litter on the ground, the mounds of plastic trash bags on our sidewalks, and the rat population. We are pleased with DSNY's efforts to implement waste

containerization in Manhattan Community District 9 and Brooklyn Community District 2, especially since similar programs have been long established in global cities such as Barcelona, Paris, Amsterdam, and Buenos Aires.
    - We also underscore the need for long-term funding for Automated Side-Loading Trucks and containers. Going forward, NYLCV hopes the City learns from the pilot in Manhattan CB9 and Brooklyn CB2 to implement and fully fund a permanent citywide waste containerization program on our streets to streamline waste and prevent buildup on sidewalks and trashrooms.
- As stated above, DSNY should accept and process commercial solid waste at all city-owned or operated marine and rail transfer stations, and to publicly report the amount and type of waste received at such stations on an annual basis.
- As stated above, we hope DSNY continues to work towards transitioning to zero-emission vehicles for DSNY and commercial sanitation trucks.
- NYLCV supports DSNY exploring opportunities to install renewable energy infrastructure, such as solar panels and battery energy storage systems, on DSNY facilities.

NYCHA

We support efforts by NYCHA to upgrade waste storage and collection areas to improve compaction and containerization, in addition to providing larger collection bins at NYCHA campuses. **NYLCV stands with advocates calling on the City to expand recycling and organics services to all NYCHA residents**, including increasing funding for DSNY and NYCHA staffing and for composting operations like the successful program being run by the non-profit Green City Force at nine NYCHA developments. We also support DSNY's goal in SWMP26 to increase the use of City-produced compost and mulch on NYCHA construction projects and at existing NYCHA development grounds.

Food Donation

Part of reducing the amount of waste sent to landfills includes increasing the amount of edible food donated by businesses to reduce hunger and address food insecurity. **NYLCV supports DSNY's goal to increase the number of donateNYC Food Portal users and the amount of food donated through the portal and urges DSNY to ramp up outreach and education to increase the amount of donateNYC Food Portal users and donations.** The donateNYC Food Portal reduces the amount of edible food sent to landfill by connecting businesses and nonprofits with excess food to organizations that can use or redistribute it. We encourage DSNY to consider incentives for businesses in order to increase donation rates and we also urge DSNY to require organic waste recycling from all NYC businesses.

Circular Economy

NYLCV also supports DSNY's efforts to prioritize a circular economy, which will not only help NYC achieve its zero waste goals but invest in green jobs. Innovative efforts to divert materials out of landfills, which are disproportionately located in disadvantaged communities, could include developing a formalized wood and tree reuse program, a construction and demolition material reuse program and incentives, and expanding production and use of

recycled asphalt. Additionally, we recommend reforming the public procurement rules to ease purchasing and integration into capital projects of local salvaged wood material.

NYS Efforts

NYLCV strongly supports DSNY's work advancing an EPR for packaging program at the state level, which would require companies to reduce packaging, increase the recyclability of their products, and increase the use of post-recycled content. We also second DSNY's support for an EPR program for lithium-ion rechargeable batteries and urge Governor Hochul to sign legislation to establish such a program that passed both houses of the state legislature in June of this year.

The City has been behind schedule on meeting our zero waste goal of reducing the amount of waste we send to landfills 90% by 2030, so it is imperative that the City take bold action to drastically reduce waste over the next several years. Investing in recycling, composting, and other zero waste initiatives and enforcement are not only important for furthering environmental justice, improving the environment, and fighting climate change, but they create green jobs.

NYLCV looks forward to working with the City Council, DSNY, and the future Mamdani Administration as well as fellow advocates so we can move New York City towards a sustainable and equitable future, improve our quality of life, reduce garbage collection costs, increase street hygiene and attractiveness, and benefit the health of our planet and community.

Thank you for the opportunity to comment.

NYLPI
JUSTICE THROUGH COMMUNITY POWER

Comments Submitted by Justin Wood, Director of Policy of New York Lawyers for the Public Interest To the New York City Council Committee on Sanitation Regarding Engagement for the 2026 Draft SWMP On December 9, 2025

Good morning, my name is Justin Wood, and I am the Director of Policy at New York Lawyers for the Public Interest (NYLPI). Thank you to Chair Abreu and members of the committee for the opportunity to testify today, and for holding this hearing on the community engagement process and timeline for review and finalization of the City's draft 2026 Solid Waste Management Plan (SWMP). We also want to thank you for the work you and the members of this committee have done to implement major programs including Commercial Waste Zones, curbside composting, and containerization over the past four years.

The City's new ten-year solid management plan is of critical importance to public health, to our environment, and to our economy. Greenhouse gas emissions from the solid waste sector are estimated to make up 12% of New York State's economy-wide emissions – a share roughly equivalent to the state's entire electricity generation sector. Thankfully, waste policy remains largely within municipal and state control despite an unprecedented federal assault on climate resilience, renewable energy, and infrastructure funding.

To reduce the negative impacts and expense of solid waste disposal over the next decade, the SWMP should function a blueprint for both innovation and expansion of existing programs and infrastructure, and must lay out a clear pathway to achieving the goal of diverting 100% of reusable and recyclable waste from landfills and incinerators by 2030, set by this Council in the Zero Waste Act of 2023. and should map pathways to reduce the nearly $500 million currently spent exporting municipal solid waste to landfills and incinerators.

The Transform Don't Trash NYC coalition recently published "A People's SWMP" including 30 community-driven recommendations for the 2026 plan, and we look forward to discussing these initiatives with DSNY, the City Council, and the incoming Mamdani administration. We appreciate the additional time for public comment on DSNY's extensive draft plan, and plan to submit detailed comments in January.

We want to highlight a few of our major priorities to advance environmental and climate justice in the next SWMP:

1. The 2026 SWMP must fulfill the waste equity goals of the current 2006 SWMP, including a long-overdue program to accept commercial waste at DSNY's existing marine and rail transfer stations, and the construction or retrofitting of a marine transfer station to move recyclable materials from Manhattan via barge, both of which would reduce polluting and dangerous diesel truck trips from environmental justice communities in Brooklyn, the Bronx, Queens, and New Jersey. The city's four marine transfer stations were designed to accept commercial waste during overnight hours, and the final environmental impact study (FEIS) for the current SWMP incorporated a plan for private sanitation trucks to utilize these facilities. We additionally call on DSNY to study opportunities for private sanitation companies to utilize existing rail-based transfer stations to export commercial waste, while upgrading locomotives to the highest environmental standards.

2. The next SWMP should set a faster timeline for citywide implementation of the Commercial Waste Zones (CWZ) program, than the three-year rollout proposed by DSNY. CWZ has the potential to sharply reduce disposed waste by incentivizing both businesses and private sanitation contractors to donate and reuse food and goods, reduce single-use packaging and plastics, and properly separate material for composting and recycling. This reform is a critical and necessary precursor to waste reduction in the business sector while bringing increased safety and health to sanitation workers and all New Yorkers.

3. We are supportive of many of the waste reduction and recycling initiatives detailed in the Draft 2026 SWMP, including increased composting, textile recycling, food donation, reuse and repair, construction and demolition recycling, and extended producer responsibility legislation. We stress the need for diversion programs, public education, infrastructure, and enforcement, and data collection to be scaled up to meet both City and State waste reduction and greenhouse gas emissions reduction goals.

4. The SWMP should map a path to reduce disposal and export costs over the next decade, especially by reducing the quantities of waste incinerated in EJ communities such as the ReWorld Essex facility in New Jersey. As diversion rates increase, DSNY should look for opportunities to reduce the number of refuse collection routes, increase the number of compost and recycling collection routes, and reduce or eliminate contracts with waste incinerators and landfills.

5. Too often, we have seen year-to-year budget cuts undermine critical recycling programs, leading to stagnating citywide diversion rates.

The 2026 SWMP should call for ample baseline funding for DSNY's composting, recycling, waste reduction, public education, and infrastructure programs, and should identify stable state funding sources to assist within these commitments.

We urge the Mamdani administration, DSNY, and the City's entire state legislative delegation to aggressively push for ample, stable New York State funding to support municipal waste reduction programs, including: a) an expansion of the Sustainable Futures Fund; b) implementation of the long-delayed Cap and Invest Program expected to generate billions annually for climate and resiliency projects; and c) extended producer responsibility programs.

Thank you for the opportunity to testify. We look forward to working closely with the City Council, with DSNY, and with the incoming Mamdani administration to transform our unsustainable and costly waste export model to a system with far less waste generation, and investments in sustainable and local reuse, composting, and recycling industries.

Yours,

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About New York Lawyers for the Public Interest

Founded nearly 50 years ago by leaders of the bar, New York Lawyers for the Public Interest (NYLPI) is a community-driven civil rights organization that pursues justice for all New Yorkers. NYLPI works toward a city where all people can thrive in their communities, with quality healthcare and housing, safe jobs, good schools, and healthy neighborhoods. Our community-driven approach powers its commitments to civil rights and to disability, health, immigrant, and environmental justice, as we seek lasting change through litigation, community organizing, policy advocacy, pro bono service, and education. For more information visit: www.nylpi.org

December 9, 2025

Testimony regarding DSNY's Draft Solid Waste Management Plan: NYC Should Create World's First Office (or Department) of Circularity

My name is Anna Sacks, and I am a waste expert, a member of the Manhattan Solid Waste Advisory Board, Co-Founder of the Save Our Compost Coalition, and Founder of The Trash Walker, where I explore NYC's waste systems. Thank you for the opportunity to submit testimony about the SWMP. I am testifying today on my own behalf.

First, I want to echo the SWABs' recommendation that the public needs more time to meaningfully engage with DSNY's SWMP. This plan will guide New York City's waste management for the next decade, yet only 18 public comments have been submitted from a city of 8.5 million people. This is woefully insufficient. DSNY must devote more resources to public outreach and engagement to ensure that New Yorkers understand the plan and have the opportunity to weigh in.

In addition, I believe that all Waste Prevention and Reuse Programs should be carved out of the Department of Sanitation (DSNY) and moved into a dedicated Office (or Department) of Circularity.

Waste Prevention and Reuse Programs are essential to building a sustainable, regenerative waste system for our city. Yet within DSNY, they are consistently overshadowed and under-resourced. Waste prevention and reuse do not feel central to DSNY's mission, which has traditionally focused on collection, disposal, and street cleaning. As a result, these programs are often left to a small number of staff who simply do not have the financial resources, staffing, or agency required to succeed. Additionally, because these programs are embedded within DSNY yet not core to its operations, they remain particularly vulnerable to budget cuts and agency reorganization.

A dedicated Office of Circularity would provide the leadership, stability, and vision needed to meaningfully scale waste prevention and reuse across New York City. It would ensure that these programs no longer "get lost" within a much larger agency and that they receive the long-term investment they require.

I believe this Office would be the first of its kind in the world, taking circularity from an abstract buzzword to a set of concrete practices, and serving as a model for other cities to replicate. It would divert from landfills and incinerators, recirculate items, build community, and create local green jobs.

Here are just a few ideas of what a dedicated Office of Circularity might work on:

Schools:

- Develop and implement a plan to switch NYC's 1,800 public schools (serving 900,000+ students) from single-use items to reusables —saving at least 3 million single-use items per school day (assuming each student uses a cup, fork, and plate).
- Reduce cafeteria waste by switching from individual milk cartons to bulk milk dispensers and establishing share tables.
- Work collaboratively with schools (public and private, from nursery through college) at the end of each school year to create reuse systems for school supplies, books, furniture, and more.
- Build Little Free Libraries at each school to conveniently recirculate books during library weeding.
- Place refashionNYC bins at schools to collect unwanted clothing from lost and founds and clothing drives, with the potential for families to drop off items too.

Corporations:

- Develop emergency response protocols for refrigeration outages at grocery and drug stores.
- Require that corporations donate hygiene items (pads, tampons, toothpaste, soap, shampoo etc.).
- Require that restaurants with sit-down spaces and corporate cafeterias offer reusables.
- Require that stadiums, theaters, and other large venues have a reusable cup option (potentially a deposit system).
- Increase the number of water bottle fountains at stadiums, theaters, and museums.
- Transition from demolition to deconstruction practices.
- Support thrift stores in managing donation overflow — starting with waste audits to understand what's being discarded, identifying end markets for those materials, and providing city-supported space for processing and selling excess donations.

Residents:

- Provide support for residents with unwanted items — whether they're moving, emptying an apartment, or struggling with hoarding.
- Host monthly community swaps in each district (e.g., in churches, on open streets, or at community centers).
- Pilot a monthly furniture collection day when residents can set out unwanted furniture. Neighbors could walk around and take what they need, followed by nonprofit partners with trucks, and finally by DSNY for last-resort disposal.

Government:

- Create community reuse centers that host events around repair, dyeing (e.g., indigo workshops for stained clothing), upcycling, and swapping. These could double as supply

centers for schools and nonprofits — similar to Materials for the Arts — ensuring at least one in each borough.
- Expand public access to water fountains and bottle refill stations.
- Identify potential sources of government waste in advance (e.g., closing down shelters or dismantling dining sheds) and develop reuse plans beforehand.
- Strengthen and support existing local circular climate programs — such as community composting, the Billion Oyster Project, mattress recycling, and cloth diapering.

Testimony to NYC Council Committee Sanitation and Solid Waste Management
Oversight - Engagement for the City's 2026 Solid Waste Management Plan
December 9, 2025
Audrey Jenkins, MPH
https://legistar.council.nyc.gov/MeetingDetail.aspx?ID=1348340&GUID=4883ACDD-550D-4210-8235-2E199F6BD517&Options=info%7C&Search=

Dear members of the Sanitation Committee,

My name is Audrey Jenkins, and I am a doctoral candidate at The New School where I research public empowerment in urban social-ecological policy, currently focused on organics management in NYC.

Since fall 2023, when community composting was defunded by the Adams administration, I have been studying the efforts of community-based composters to deepen the city's investments in building an organic waste system that returns the value of organic materials to our neighborhoods in the form of valuable organic soil amendment, public ecological stewardship education, and, critically, equitable economic opportunity.

I am testifying today to highlight how valuable the Solid Waste Management Plan is for addressing inequities that are growing in our city. Although I am not here as a representative of my employer, I am currently a research associate at the Center for New York City Affairs where our most recent economic and fiscal findings highlight the New York metro area as the most racially inequitable economy among the top biggest metro-city areas in the country. We have the largest gap between white and black unemployment, with Black workers experiencing an 8.6% unemployment rate as of this quarter, a rate that - in a trend with most other cities - has risen dramatically over the past year with federal defunding and economic uncertainties.

Designing a waste system that centers equity is critical. This matters both for distribution of waste impacts and recycling opportunities, but is also important in the distribution of investments.

The Institute for Local Self Reliance has found that per 10,000 tons of organic materials, community composting generates 6.2 jobs, compared to only 1-2 jobs in industrial organics processing.

We know from decades of practice here in NYC that these community composting jobs are quality and impactful jobs. Community composters are community builders - so they are never just collecting, processing, and distributing organics; they are also teachers, social connectors, innovators, environmental stewards often also directly involved in urban agriculture and local food system sovereignty and resilience, and highly effective promoters of organics waste separation participation.

Additionally, community composting provides a rich set of professional, technical, and social skills building that are particularly accessible to youth workers as they start to enter the workforce (a population facing the highest rate of unemployment in the city at 11.4%).

Hyper-local, publicly-funded community composting in short is an incredibly simple way to help address multiple complex city problems from social isolation to environmental stewardship, while also offering an opportunity to invest directly in our neighborhoods in the form of livable jobs.

The SWMP currently highlights the layered economic potentials for textile and other resource recovery streams. The same should be included for organics. But more critically, the Solid Waste Management Plan should center economic equity. The plan currently highlights inequities in waste and pollution exposure and the importance of meeting the requirements of the Waste Equity Law. The plan should ensure that neighborhoods facing high volatility and sensitivity to political and economic conditions (e.g. historically Black and latinx communities in New York) are able to retain resources like organic materials in their neighborhoods and receive investments for managing those resources for the many economic, social, and ecological benefits they offer.

The city administration currently spends $215 million on exporting organics, and $21 million on organics separation and processing. City council currently invests a little over $6.25 million for community composting. What is needed is a serious increase in community based organics management. Because funding has not been intentionally allocated for equity in the most economically-impacted communities, the SWMP is an opportunity to take a strong stance in favor of making organics (and other waste stream) investments equitable by maximizing the use of these raw materials for local community use, including by insuring that land access for processing and good jobs are distributed explicitly in terms of economic equity and with an intentional effort to promote the multi-impact outcomes of community-based waste management.

Thank you for your time.

Citations:

NYC Department of Sanitation. (2025). Solid Waste Management Plan 2026 Draft. *Accessed: December 9, 2025.* https://www.nyc.gov/assets/dsny/downloads/resources/reports/solid-waste-management/2026-swmp/draft-swmp-2026.pdf

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Melodia, L. et al. (2026 forthcoming) New York City's 2026 Economic and Budget Outlook Report. Center for New York City Affairs.

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I represent: DSNY

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I represent: Manhattan Solid Waste Advisory Board

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I represent: Brooklyn Borough President Antonio Reynoso

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Name: Gustavo Alcocer

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I represent: Ironbound Community Corporation

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Name: Justin Green

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I represent: BIG REUSE

Address: 1127 Street, Brooklyn NY

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Name: RHONDA KEYSER

Address: [redacted]

I represent: Cafeteria Culture

Address: 3rd St/Ave D Manhattan

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I represent: Bronx SWAB

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Name: Audrey Jenkins

Address: Brooklyn NY 11221

I represent: myself

Address: _____

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Name: Dr. Samantha MacBride

Address: [redacted] NYC 10010

I represent: self

Address: "

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Name: Jennifer McDonnell

Address: Deputy Commissioner of Solid Waste Management

I represent: _____

Address: _____

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Name: Joshua Goodman

Address: Deputy Commissioner Public Affairs

I represent: DSNY + Customer Experience

Address: _____

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Name: ~~[illegible]~~

Address: ERIC GOLDSTEIN

I represent: NATURAL RESOURCES DEFENSE COUNCIL

Address: 40 WEST 20 ST NYNY

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Name: ~~[illegible]~~

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

I represent: NYCPI

Address: 151 W 30th St.

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Name: Susan Lathan

Address: [redacted] Jackson Hts NY 11372

I represent: QSWAB

Address:

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Name: Mary Ellen Sullivan

Address: [redacted]

I represent: Brooklyn SWAB

Address: 209 Joralemon St, BK

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Name: CELESTE LERER

Address: [redacted] NY, NY 1000[illegible]

I represent: NYCPL

Address: 151 E 58th St.

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