



March 25, 2025

Testimony for Committee on Sanitation and Solid Waste Management

New York City Council Budget and Oversight Hearings on The Preliminary Budget for Fiscal Year 2026, The Preliminary Capital Plan for Fiscal Years 2026-2029 and The Fiscal 2025 Preliminary Mayor's Management Report

The [Center for Zero Waste Design](https://www.centerforzerowastedesign.org/) is a nonprofit that develops research, advocacy campaigns, and policy tools for buildings and cities to achieve zero waste. We work with community organizations, nonprofits, and municipalities to provide thought leadership to ensure policies and systems are aligned for circularity.

I am going to talk about waste containerization and community composting.

We fully support DSNY's goals of getting rid of bags of waste on sidewalks, but the way DSNY is moving forward is very problematic. It should be slowed down and stakeholder input should be considered. While DSNY's plans may achieve the simple aim of reducing bags, they are:

- **Bad for zero waste goals.** DSNY rules require containers just for trash, even though it is compostable waste that brings the rats. If the city continues to invest in trash-only infrastructure they will further reduce the already low (under 20%) diversion rate. We know that from history; building code used to only require trash chutes, so in many buildings you need to go to the basement to drop off recycling or compostable waste. Code was changed to increase diversion rates, by requiring recycling bins or chutes alongside a trash chute. If you make it easier to store and dispose of trash, compared to recycling or compostable waste - then you are making it harder for both building staff and residents to do the right thing. *The city should not be investing in trash-only infrastructure if we want to reach our zero waste goals!*
- **Bad for labor.** DSNY's plans still rely on labor hauling heavy bags around - this is back-breaking labor that is not allowed in European countries by health and safety regulations. *I do not know if it complies with OSHA and if it is legal in the US.* Building staff will need to lift tens of ±50 lb bags of trash a day 4' high into permanent containers on the streets. DSNY labor also still often pull bags out of 2 wheeled bins, as access to the truck is limited by parking.
- **Bad for public space** - since DSNY's bin mandates, city sidewalks are packed with bins blocking pedestrians, from residential 1-9 unit and commercial properties. Nearly 20% of 1-9 unit attached buildings citywide have storefronts on the ground floor, 40% in Manhattan, so there is no room for the bins inside, and they have to be permanently

stored on the sidewalk, reducing retail activity, impeding pedestrians, and degrading the experience of public space and outdoor dining.



- Volunteer groups and BIDs are being forced to cease supplemental services or invest in substandard containerization solutions that dirty sidewalks and streets. The enclosures full of bags that DSNY are asking them to use were deemed impractical in DSNY's own [Future of Trash](#) report, p. 22 - saying that they require too much time to service, too much maintenance to keep clean, and take up too much curbside space. Dragging bags across the sidewalk and street makes them dirty, and the enclosures are hard to clean, and time consuming to empty.



- **Inequitable.** Making buildings buy and maintain bins will just perpetuate the inequitable nature of NYC streetscapes - with clean sidewalks and streets in well-financed neighborhoods which have plenty of building staff and well-resourced BIDs. Meanwhile we know under-resourced buildings will struggle to maintain on-street Empire Bins, and we've heard how many residents have had their 2-wheeled bins stolen.

At the same time [Intro 1123](#) is mandating citywide roll out of Empire Bins, before they have been piloted in CB9, before the Environmental Review has been done. **Why?**

Wouldn't it make much more sense to evaluate multiple containerization options, compare them and then move forward?

Intro 1123 could just mandate containerization is done, but not the way it has to be done, since it hasn't yet been evaluated.

In the CB9 district there are only ± 3 buildings over 300 units, so it is not a very good test case for large residential buildings. A quarter of units in Manhattan are in buildings that have 300 or more units. Given that a 300 unit building requires 8 Empire Bins, and an 800 unit building

requires 18 Empire Bins, we are talking about a lot of permanent curb space taken up in front of these buildings, and lots of containers to be maintained and cleaned around.



There are better options that take up less curbside space, temporarily, require no lifting of bags, and no maintenance of on-street containers. We are currently working with the City of Hoboken to pilot our suggested solution of retrofitting trash chutes to feed into 4-wheeled bins, and staging them temporarily on the street for collection. This pilot was popular with building owners too - 60% of their large building management in the neighborhood opted to join the pilot, despite costs and change in operations for them.

See our [Waste Containerization Primer](#) for more, or our more extensive [On Containerization Report](#).



Community Composting:

I would also like to thank City Council for providing funding for the [NYC Community Compost Network](#) last fiscal year, including funding more organizations than previously funded by DSNY. I would like to see the council increase funding for community composting the next year, including for the LESEC composting site in Canarsie (as with the eviction of Big Reuse from Queensbridge Site, and the DEP work on Big Reuse's Gowanus site, and the construction work on LESEC site in East River Park, the city has been short of larger community compost sites this year. With BR Gowanus about to open, and Canarsie, as well as Earth Matter (soon to relocate) they will be able to support stand-alone foodscrap drop-off sites at farmers markets and elsewhere as well as extra capacity from neighborhood community gardens. I'd also like to see more small neighborhood community compost organizations to be funded, and the expansion of operations such as Compost Power who work in NYCHA, or Brotherhood Sister Sol.

Lastly I'd like to see the compost applied more to all the compacted and degraded soils in our city, so that it can act like a sponge. This is part of our [Put Waste to Work: For Vibrant Streetscapes, Green Jobs and Healthy Neighborhoods](#) plan, and described in an Op-Ed I co-wrote with Dr Samantha MacBride (former DSNY) - [Don't Kill Community Composting in NYC](#) in Bloomberg CityLab. The city needs many more community composters to make compost from food scraps and plant waste and then apply it to trees and parks and greenspaces citywide. It ensures that trees and plants are healthy, and provide all the urban cooling, stormwater mitigation and pollution removal they can. In return New Yorkers who volunteer in neighborhood greening activities with community composters become connected to nature, to each other and find a way to enjoy themselves that doesn't involve consumption or money. It allows them to live more mindfully and brings hope.

Community composting also educates New Yorkers, and is essential to increase the mere 4% of organic waste that the municipal collection is capturing.

I call for expanded funding for more community composting groups to the \$11.5 million requested by [Save our Compost](#) in the next fiscal year.

I am happy to talk to any council member or staff about Waste Containerization or Community Composting!

Thank You!

Clare Miflin
Executive Director
Center for Zero Waste Design