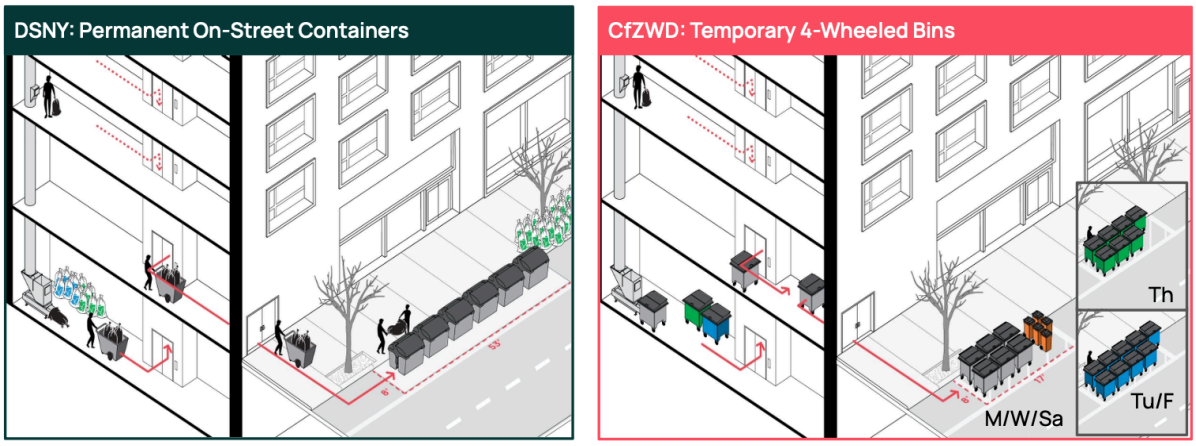
Center for Zero Waste Design

Re: Rules Hearing on DSNY's Containerization Requirements for Buildings Containing 10 or More Dwelling Units
Date: June 17, 2026

I am Clare Miflin, from the Center for Zero Waste Design, a nonprofit organization that has researched best practices for waste containerization around the world, and advocated for NYC to containerize its waste for a decade.

We are glad that DSNY has chosen to next pilot waste containerization in Brooklyn CB 2, a neighborhood with a very different urban form from CB 9 in Manhattan, and believe it is a great opportunity to pilot alternate methods of waste containerization which would also help reach zero waste goals, improve public space and reduce building operating costs which ultimately are passed onto New Yorkers through rent or maintenance charges. Downtown Brooklyn was upzoned in 2004, and since then has experienced huge growth, with 22,000 new apartments mostly in high rises, and a redesign of the public realm which prioritizes pedestrians, along with many bike lanes and bus lanes. This means that many large new buildings do not have enough curbside space available for the many Empire Bins they would require.

We are glad to see that this rule allows DSNY to determine that certain buildings should use a different set-out method. Buildings need to register by July 31st, DSNY needs to inform them if there is an alternate method of containerization by August 15th, 2026, with implementation by October 15th 2026. This timeline is extremely tight, especially given the coordination with DOT and building owners that would be required to plan and install the 4-wheeled bin pilot that we believe is the best alternative containerization method for this neighborhood. Compared to Empire Bins this solution would take up less space, improve labor, and save costs up to 80%. Curbside space used to stage the 4-wheeled bins could also be used for deliveries later, in a neighborhood with a huge demand for curbside access.



DSNY's Empire Bins compared to the Center for Zero Waste Design's proposed 4-wheeled bin solution for a ~300 unit building. These bins can be attached to existing trash compactors and wheeled directly to the curb for collection.

We recommend that the determination and implementation dates for alternate methods should be extended, and DSNY should start planning alternate method pilots for both small and large buildings. See our website for more on our recommended pilots and our report the Hidden Costs of Trash, which showed that the average cost for managing waste in buildings is almost $1000 per apartment per year - costs which could be greatly reduced or eliminated with our recommended pilots. This report was also covered in a Vital City op-ed.

We are very glad that as stated in the rule, DSNY intends to collect more data to be able to evaluate the Empire Bin pilot before rolling out citywide. We urge DSNY to evaluate the pilot, including the alternate methods used, in terms of criteria including:

- Diversion of recycling and compostable waste,
- Number of permanent bins obstructing sidewalks
- Amount of curb lane permanently and temporarily used for waste staging
- Impacts to both building and DSNY labor.

Sharing key performance indicators that will be measured, and the results of the evaluation will help advocacy organizations and New Yorkers support this huge change to the way NYC is collecting waste.

We strongly believe that NYC should plan to containerize waste that doesn't require building staff to lift tons of garbage bags 4' high into Empire Bins every week. Such work is not permissible by health and safety regulations in many countries, and I strongly encourage NYC to design waste systems to phase out the requirement of such backbreaking labor for both DSNY and building staff workers.

The Center for Zero Waste Design is ready and willing to help DSNY ensure that this waste containerization in NYC is as successful and impactful as it can be.

Thank you,

Clare Miflin
Executive Director
Center for Zero Waste Design