

**Testimony of Eleanor Tahbaz,
New York Lawyers for the Public Interest
New York City
Committee on Sanitation and Solid Waste Management
June 15, 2022**

Thank you, Chair Nurse, and members of the Sanitation and Solid Waste Management Committee for the opportunity to speak at today's committee hearing. My name is Eleanor Tahbaz and I am a Policy Intern at New York Lawyers for the Public Interest (NYLPI).

We are grateful to each of you and to Speaker Adams for advancing major legislation that, if passed into law, would make major strides toward a more sustainable waste system in New York City.

As our world faces an escalating climate crisis, New York City continues to send almost 80% of our municipal waste stream to landfills and incinerators. Most of this waste could be recycled and reused, as well as to help reduce our energy usage. Solid waste is now estimated to contribute at least 12% of New York State's greenhouse gas emissions, and the harmful impacts of our inadequate waste system are felt daily throughout the city as rat populations surge, piles of garbage bags block our sidewalks and streets, and environmental justice communities continue to experience disproportionate harm from waste transfer stations, truck yards, and dangerous garbage trucks.

In recent years, multiple rounds of budget cuts, freezes, and delays to diversion programs in both the residential and commercial sectors have undermined participation in recycling programs, taking us backward from our goal of zero waste by 2030 and perpetuating existing inequities.

Therefore, we enthusiastically support the bills being considered today and offer a few suggested amendments:

Intro 274 would establish a goal of diverting 100% of New York City's citywide generated waste by 2030 and require The City of New York Department of

Sanitation (DSNY) to report on and develop plans to address any waste that cannot be diverted. We encourage the Council to amend this bill to define “citywide generated waste” to explicitly include all municipal waste, commercial trade waste, and construction and demolition waste generated within the city.

Intro 275 would require DSNY to report annually on the City’s progress toward a goal of sending “zero waste to landfills” by 2030 and to develop plans to increase diversion in various waste streams, including waste generated in NYCHA properties. We urge the Council to expand this to include diversion from incinerators as well as landfills, as incineration of solid waste is a major source of greenhouse gas emissions and air pollution in environmental justice communities near New York City and statewide.

We recommend that both Intro 274 and 275 be amended to include planning for diversion of commercial waste in each of the commercial waste zones established by Local Law 199, and a specific plan to increase diversion of construction and demolition waste citywide.

Intro 244 would mandate a universal composting program by 2023, through which all New Yorkers can recycle their food and yard waste, and in which building owners and managers are required to participate – just as they are with other recyclable materials. This investment in recycling organic waste is critical to meeting our city’s zero waste and climate goals and has the potential to support far more, good green jobs in our city and region than our current export- and disposal-centered waste management system. We also recommend that specific attention be paid to large multi-family apartment buildings and NYCHA housing specifically to maintain equality and equity with this program roll out.

We support the rapid, citywide scale-up of organic recycling envisioned in this bill. The low participation rates and excessive costs of the current opt-in organics program underscores that any successful program must be mandatory and universal to realize high participation rates, consistent public messaging and education across communities and building types, and economies of scale. As the Independent Budget Office [recently reported](#), a rapid, citywide organics program could also yield cost savings of \$33 million within five years.

If NYCHA properties cannot be included in this mandate, we urge the Department of Sanitation and Council to ensure NYCHA properties likewise implement a robust organic waste recycling programs in parallel with the timeline for other large residential buildings established by Intro 244.

We also note that the timeline for a citywide residential compost program mandated by Intro 244 is well-synchronized with the expected expansion of organics recycling programs in commercial businesses as enforcement of the City's commercial organics rules is set to begin this July, and implementation of Local Law 199 proceeds later this year. This bill has beneficial source-separation rules and practices for workplaces, commercial businesses, schools, and residences which allows the programs to be as uniform as possible so that public and customer education campaigns are consistent, widely distributed, and mutually reinforcing.

Finally, NYLPI continues to support passage of Intros 280 and 281, known as the CORE Act, which would lock in and build upon the success of community drop-off sites for organic waste and recyclables and ensure equitable distribution and access to these sites in every borough and community district. Much of the organic material collected at food scrap drop-off sites is processed locally by community-facing organizations, which reduces emissions associated with exporting this material, supports the creation of local, family-wage sustaining green jobs, deepens public education and understanding of, as well as community commitments to zero waste programs, and produces rich fertilizer that can be utilized to maintain and preserve parks and community gardens city wide.

To reform our sprawling waste management system, which is severely inadequate, environmentally unsustainable, and disproportionately harmful to environmental justice communities, we need a clear plan, timeline, and investments in programs that will achieve our zero waste by 2030 goal. We urge the council to make necessary amendments, pass these bills and for Mayor Eric Adams to sign them into law as soon as possible.

Thank you,
Eleanor Tahbaz