



NYC-EJA Testimony on the Public Safety Requirements for Carters Operating in Commercial Waste Zones

April 13, 2021

My name is Dr. Tok Michelle Oyewole, and I am testifying on behalf of the New York City Environmental Justice Alliance (NYC-EJA).

Founded in 1991, NYC-EJA is a non-profit citywide membership network linking grassroots organizations from low-income neighborhoods and communities of color in their fight for environmental and climate justice.

For decades, NYC-EJA has led efforts for comprehensive policy reforms to address the disproportionate burden of New York's solid waste system on a handful of environmental justice communities. The impacts of the solid waste system are greatest in a few low-income and communities of color where truck-dependent transfer stations are clustered, causing higher proportions of health consequences such as asthma, heart disease, and various cancers, in addition to a variety of physical safety hazards (accidents, damage, intimidation, etc.).

We are here today to advocate alongside other members of the Transform Don't Trash coalition to express support and concerns regarding the proposed safety rules. One primary theme of our testimony is that public safety relating to commercial waste is inclusive of more than just vehicle design and driving practices, even while these are critical pieces of the picture.

We are pleased to see many current emphases within the proposed rules, including the requirement of telematics/ GPS system on trucks, and particularly their use in monitoring vehicle miles travelled.

Today we urge that the safety rules for truck design requirements do not preclude, and in fact build in room for the transition to different types of electric vehicles for waste transport. Additionally, we urge that the specific concerns of small-scale microhaulers can be addressed as they relate to the use of different types of zero- and low- emissions vehicles.

Critically, the rules pertaining to vehicle inspections should add engines among components regularly monitored, to ensure that there is not an excess in particulate matter (PM) 2.5 emissions during this time when waste vehicles are still powered by polluting fossil fuels.



In addition to prevention of road blocking, we hope to see that the truck engines are not idling for extended periods of time. We also hope to see carters financially accountable for road and other damage, particularly in overburdened neighborhoods.

We hope to hear about facility compliance later, and today remark that it is an important part of considering safety. We particularly want to see facilities that have not been in compliance with laws relating to public health and safety either 1) not contracted with in the Commercial Waste Zones (CWZ) system or 2) brought up to code without any further delay. These compliance issues include things like building codes, odors, and leachate.

And last, safety includes relationships and the ability to be transparent. In Southeast Queens for example, there have been reports of intimidation of members of the public by carting/transfer station companies, which breeds a system where hazards and concerns can not be safely reported without fear of retaliation.

Thank you for the opportunity to raise these urgent concerns. We encourage you to invest in the development of long-term waste reduction and waste equity plans, to reduce burdens unjustly faced by a handful of communities in and out of NYC, to transition to safer vehicles and facilities, and to better preserve our planet's limited resources.