



Testimony for DSNY Proposed Rule Hearing February 10th, 2025

DSNY Proposed Rule Relating to Entities Engaging in Cleaning Services

The Center for Zero Waste Design 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. We thank the Department of Sanitation (DSNY) for this opportunity to comment on their proposed rule relating to Entities Engaging in Cleaning Services.

We fully support DSNY's goals to get rid of bags of trash piled up on sidewalks and instead move to a system where waste is collected from bins and containers by mechanized trucks. But we have strong concerns about the way DSNY is moving forward with waste containerization, without any outside stakeholder input, and moving forward in a way that goes against the City's goals of improving pedestrian mobility and the quality of the public realm. We recently released a report [On Containerization](#), which outlines alternatives to DSNY's plans which would allow waste containerization to improve streetscapes and labor, at lower cost, and would help the City reach waste reduction and climate goals.

Our concerns include:

- **Lack of stakeholder or public engagement:**
There has been very little outreach and discussion with the groups doing the hard work, much of it volunteer labor, helping keep the city clean who are affected by this rule. As many of the BIDs testifying stated, this is a huge additional cost to them, cannot be made by August of this year, and their concerns have been ignored.
- **Most containerization solutions currently available to these groups are enclosures for bins, which are expensive, take up a lot of sidewalk or curbside space, and are not suited for BIDs with substantial volumes of waste.**
The rule requires waste be set out for collection "in rigid receptacles with tight fitting lids that do not exceed fifty-five gallons in size, unless an alternative receptacle is approved by the Department." I believe the alternative is tilt trucks or hampers within an enclosure, as DSNY will be lifting the material by hand into the back of the truck. **These solutions are not space or cost efficient, and do not improve labor for DSNY collection staff.** Also, DSNY is rolling out alternative containerization solutions, like the Empire Bins being piloted in CB9, so why not wait and evaluate solutions like this before making entities invest substantial dollars in short term solutions?

- **Negative impact on streetscapes and pedestrian mobility**

Placing 55 gallon bins on sidewalks will be the cheapest and only option available for many groups to be able to continue supplemental cleaning services. This will just add to the many permanently located bins we already see on sidewalks. We will have more bins chained to street trees and DOT poles alongside litter bins, to prevent theft. These bins will block pedestrian traffic along sidewalks. Given that almost half of NYC has sidewalk widths below 9 feet wide, per [Open Street data](#) - and the growing [crowdedness of NYC sidewalks](#) in general, the reduction in walkability and accessibility is unacceptable. The aim is to improve sidewalks and public space, not make them more cluttered.



Alternative Solutions Include:

We believe there are many alternate solutions that DSNY should consider piloting with BIDs or neighborhood entities:

- **Adjusting collection times to reduce volume of waste to be stored.**

Adjusting collection times to collect waste more frequently, especially at times of high generation rates, could reduce the amount of time waste needs to be bagged alongside the litter basket. Many BIDs state that DSNY collection times are not consistent, which makes it difficult to know how much waste volume to plan for. Working with BIDs to locate the bags in better locations for DSNY's collection routes could also make it more efficient for DSNY.

- **Consider large stationary containers aka "Empire Bins" for neighborhoods with large volumes of litter bin waste.**

“Empire Bins” (the 4 cubic yard containers used in Barcelona and many other European and South American cities) would be a much more space efficient for waste to be stored, would cost much less, and be better for DSNY labor. I do realize DSNY do not yet have enough trucks to roll this out citywide, but they could pilot and evaluate it in CB9 or on a route which could easily be serviced by a truck working on that upcoming 2025 pilot.

- **Collect waste from alternate off-sidewalk locations - eg loading docks, trucks.**

Some BIDs have access to loading docks in their district, through agreement with the building owner, and could stage waste temporarily there. Other BIDs have trucks for supplemental service - if they fill a box truck with bags of litter bin waste, DSNY could collect directly from the truck. These innovative approaches don't require any new permanent infrastructure.

- **Collect from larger 4-wheeled bins**

There are other products available which are not full enclosures, but instead allow 4-wheeled bins, with a capacity of 283 gallons, to be docked in place. If DSNY added simple lift mechanisms to their existing rear load trucks, they could pick up both 2-wheeled and 4-wheeled bins mechanically. This would allow them to collect larger capacity bins from both on-street and from large multifamily buildings - where the 4 wheeled bin can be directly hooked up to the trash chute and offer greater compaction. This option is cheaper and more space efficient, taking up less curb length which is needed for so many other reasons - passenger pick up, deliveries, bike lanes, bus lanes and parking.



Docked 4-wheeled bins in Vienna, Austria



Docked 4-wheeled bins in Liverpool, UK (by Metrostor)



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We believe that DSNY should work with BIDs and other entities to pilot and evaluate a range of solutions before offering a suite of options citywide. It is thoughtless to expect entities to figure out and invest in a short term solution, when there may well be much better options available.

We would welcome the opportunity to discuss our suggestions with DSNY and help improve the outcomes of waste containerization citywide.

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