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Comments of 32BJ SEIU

On the Department of Consumer and Worker Protection's proposed rules related  
to Local Laws 95, 107, 108, 113, 123, and 124

December 8, 2025

Thank you for the opportunity to submit these comments on the Department of Consumer and Worker Protection's proposed rules related to Local Laws 95, 107, 108, 113, 123, and 124 of 2025. These rules will provide the necessary framework for implementing critical minimum pay standards and strengthening protections for 20,000 app-based grocery delivery workers in New York City.

32BJ is the largest building service union in the country, representing over 185,000 members up and down the East Coast and 85,000 in the New York City metro area. Our members are primarily immigrants and people of color, and make up the workforce of essential cleaners, door-people, airport workers, and other building service workers who keep our homes, workplaces, schools, and transportation hubs up and running. 32BJ and our members have fought hard to negotiate strong contracts that provide a living wage, family-sustaining benefits, and critical job protections, but we understand that many workers in this city still lack the level of compensation and stability our members enjoy.

New Yorkers depend on app food delivery drivers to get food every day and in the worst weather and in the worst times, including during floods and pandemics. They are essential to our city and deserve the ability to support their families and pay their bills. 32BJ SEIU supports DCWP's proposed rules to implement the vital set of protections the City has enacted to protect delivery drivers and ensure their well-being.

Thank you for the opportunity to submit these comments.